

ONTARIO SUPERIOR COURT OF JUSTICE

B E T W E E N:

**FAIR VOTING BC and
SPRINGTIDE COLLECTIVE FOR DEMOCRACY SOCIETY**

Applicants

- and -

ATTORNEY GENERAL OF CANADA

Respondent

AFFIDAVIT OF MAHTAB LAGHAEI

I, Mahtab Laghaei, of the City of Vancouver, in the Province of British Columbia,

SOLEMNL Y AFFIRM:

1. I have personal knowledge of the matters deposed herein. Where I have relied on the information of others, I believe it to be true.
2. I'm a 23-year-old first-generation immigrant. I moved to Canada in 2005.
3. I work with a women's organization working to build cities where all self-identified women and girls have real social, economic, and political power.
4. I am an NDP supporter. I do not feel that our current first-past-the-post electoral system fairly represents me. Some of the issues I care most about that set the NDP apart from the Liberal and Conservatives are Indigenous sovereignty, implementation of a wealth tax, expansion of public programs such as universal childcare and pharmacare, and bolder commitments to address the climate crisis.

5. I live in the Vancouver Quadra riding since 2005, which is the 6th wealthiest riding and includes the 4th largest university in Canada. The Liberals have held my riding in every election since 1984, with as little as 36.05% of the popular vote.¹
6. Since Vancouver Quadra riding's creation, in 1949, it has only ever returned Liberal or Progressive Conservative MPs. In fact, Liberal or Conservative (including PC) candidates have also finished *second* in every election since 1949, aside from 1993, 1997, and 2000, where Reform/Alliance candidates finished second.
7. NDP candidates in Vancouver Quadra riding have often pulled between 15% and 20% of the vote, obtaining as much as 24.46% of the vote in 1979.² Yet an NDP candidate has never finished higher than third in the riding.
8. This history is discouraging for me, as an NDP supporter. I've voted in two federal elections thus far, and do not feel that I have any hope of electing an NDP candidate in my riding.
9. In 2015, because I was worried that a Conservative candidate might win the riding, I voted for a Liberal. I knew that a vote for the NDP had no chance of being successful, and voting Liberal seemed like the lesser of two evils. I found it disheartening to feel as if I couldn't vote for the party I am most aligned with and have it count, for fear of ending up with a Conservative MP who was unaligned with any of my interests.

¹ https://en.wikipedia.org/wiki/Vancouver_Quadra.

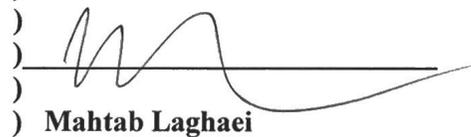
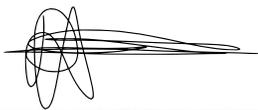
² NDP candidates gained **15.1%** of the vote in the 2019 election, **10.85%** in 2015, **13.81%** in 2011, **8.06%** in 2008, **14.43%** in 2008 (by-election), **16.08%** in 2006, **14.99%** in 2004 election, **5.22%** in 2000, **10.03%** in 1997, **10.69%** in 1993, **21.38%** in 1988, **16.82%** in 1984, **21.75%** in 1980, **24.46%** in 1979, **11.33%** in 1974, **20.15%** in 1972, **14.96%** in 1968, **16.09%** in 1965, **14.66%** in 1963, and **17.14%** in 1962: https://en.wikipedia.org/wiki/Vancouver_Quadra.

10. In 2019, I voted for the NDP, knowing it would not have any impact on the election. I don't feel that my vote makes a difference, particularly in a riding consistently held by the Liberal Party for the last 37 years.
11. I find it deeply troubling that a single party can have such a stronghold on a riding for so long. Yet, in the future, and depending on the situation, I may continue voting for the incumbent Liberals to avoid a Conservative win.
12. While there are some common issues between my own views and that of the Liberals, the Liberals continue to renege on those similar positions after being elected. Other than the campaign promise for electoral reform, for example, they overwhelmingly rejected Bill C-213 for universal pharmacare. Furthermore, upon entering cabinet after the SNC-Lavalin shuffle, notably anti-pipeline Quadra MP Joyce Murray, who had spoken out against the Liberal cabinet's approval of the Kinder Morgan pipeline on the grounds that she was representing her riding,³ chose to abstain from the parliamentary vote on the pipeline. This neither represented my views nor, according to Ms. Murray's own admission, did it represent the majority views in her riding. It is difficult for me and other constituents to feel we can hold a political party accountable because Liberals are so secure in this riding.
13. What is also wholly frustrating to me are the false promises from parties to enact change in our electoral system, only to abandon them while in power. Ironically, Joyce Murray favoured proportional representation in her Liberal leadership campaign. But she no longer promotes this issue.

³ https://www.huffingtonpost.ca/2019/03/18/joyce-murray-trans-mountain_a_23695048/.

14. Vancouver Quadra is very diverse. In 2016, more than 40% of its population was visible minorities.⁴ Yet, to my knowledge, Vancouver Quadra has never returned a racialized MP. In fact, since I have been in this riding, there has never even been a racialized candidate from any of Canada's main parties (Liberal, Conservative – including PC, Alliance, or Reform – NDP, or Green). The result, from my perspective, is an unrepresentative riding in an unrepresentative Parliament. The lack of diversity in Parliament has further discouraged me and my civically engaged friends who are women, racialized, and otherwise marginalized from ever joining or running our own campaigns to become MPs. This is unfortunate, as I don't feel my voice and concerns will be as equally represented in Parliament until our electoral system more fairly represents Canada's population.

AFFIRMED BEFORE ME, by videoconference,)
from the City of Vancouver, in the Province of)
British Columbia, to the City of Toronto, in the)
Province of Ontario, on the 13 day of)
April, 2021.)



) **Mahtab Laghaei**

Commissioner of Oaths, etc.

Nicolas M. Rouleau (LSO #54515D)
Nicolas M. Rouleau Professional Corporation
41 Burnside Dr.
Toronto ON M6G 2M9

⁴ https://en.wikipedia.org/wiki/Vancouver_Quadra.