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September 16, 2014

VIA E-MAIL

Ms. Alessandra Nosko
Borden Ladner Gervais
Scotia Plaza, 40 King Street W
Toronto, ON M5H 3Y4

Dear Counsel:

Re: Referendum on the Decertification of the University of Toronto Graduate Students' Union ("UTGSU") from the Canadian Federation of Students ("CFS") and the Canadian Federation of Students – Ontario ("CFS-O")

Please find enclosed the answers to undertakings of Mr. Hatherall given at the Examination for Discovery conducted on September 5, 2014.

Yours truly,



Todd J. Burke

TJB/tls

Encl.

cc: *Tudor Carsten*

03395966\OTT_LAW\4616414\1

List of Undertakings/Under Advisements/ Refusals
Given at the Continued Cross Examination of Terrence Hatherell on his
Affidavit Re-Sworn the 4th day of September, 2014
Held at the Offices of Victory Verbatim Reporting Services on the 5th day of September, 2014

Tab	P.	Q.	Undertaking	Answer
1.	138	444	With respect to Exhibit B of Mr. Hatherell's Affidavit (copy of the final excel spreadsheet which the final CFSO report was based on) and Exhibit A of the Affidavit of Joelle Kabouchi, to compare both Exhibits and advise why the order of the names changed between the two.	Exhibit A of the Affidavit of Joelle Kabouchi included the draft consolidated CFSO and CFS (National) petitions validation results. During our quality review, and while assessing whether the CFSO and CFS (National) petitions were consistent, certain changes to the order of the names were made in order to more easily compare the names between the CFSO and CFS (National) petitions. We did not make ordering changes throughout the entire petition (only for the first few pages), as the ordering of the names on the hard copy CFS (National) petition was very different than the ordering of the names on the hard copy CFSO petition. As such, once the CFS (National) and CFSO petitions validation results were separated for reporting purposes, the ordering of the CFSO validation spreadsheet was no longer consistent with the initial draft CFSO validation spreadsheet and the hard copy CFSO petition. The ordering of the names on the spreadsheets did not impact our reported results.
2.	142	467	To advise why the draft spreadsheet had 30 through 75 rows and the final spreadsheet has 30 through 25 rows.	Exhibit A of the Affidavit of Joelle Kabouchi included the draft consolidated CFSO and CFS (National) petitions validation results. That spreadsheet included approximately 50 petitioners that participated in the CFS (National) petition but who did not appear to have participated in the CFSO petition. Therefore, once the CFSO and CFS (National) petitions were separated for

Tab	P.	Q.	Undertaking	Answer
				reporting purposes, there were 50 less names on the final CFSO spreadsheet as compared to the draft CFSO consolidated spreadsheet.
3.	143	471	To advise if there was a separate spreadsheet for the CFS (National) petition and, if so, to produce it.	Yes – refer to the attached Exhibit A for the CFS (National) petition results spreadsheet which excludes information provided to Deloitte by the University of Toronto under a confidentiality agreement. This exclusion applies to all future references to this spreadsheet within this document.
4.	144	476	Best efforts to advise of the date on which the final spreadsheet for CFSO was completed.	The final CFSO report was delivered on March 11, 2014. The results of the CFSO spreadsheet utilized were finalized on March 11, 2014, after which minor clean-up was performed for our working paper file purposes that did not impact the reported results.
5.	153	503	Best efforts to determine if there was any other document used in the preparation of the final CFSO report other than the final spreadsheet and, if so, to produce same.	Documents utilized in the preparation of the final CFSO report included the relevant CFSO Bylaws and the CFSO petition validation spreadsheet. CFSO Bylaws and the CFSO petition validation spreadsheet were previously provided.
6.	153	504	Best efforts to determine if there was any other document used in the preparation of the CFS (National) final report other than the final spreadsheet and, if so, to produce same.	Documents utilized in the preparation of the final CFS (National) report included the relevant CFS (National) Bylaws and the CFS (National) petition validation spreadsheet. The CFS (National) Bylaws were previously provided. Please refer to Exhibit A for the CFS (National) petition validation spreadsheet.
7.	154	510	With respect to lines 299, 435 and 2516, which are demarked in blue but there is no equivalent entry, to advise	We utilized an Excel formula to identify whether valid records (petitioners) were duplicates. All duplicates were also manually reviewed to arrive at our conclusion that the

Tab	P.	Q.	Undertaking	Answer
			whether these three individuals were determined to be valid or invalid petitioners.	<p>records were, in fact, duplicates.</p> <p>The blue highlighting was a manual process executed by Deloitte and was designed to assist with the review process. Our reported results, however, were based on the Excel formula to ensure count accuracy.</p> <p>With respect to the specific records in question, we have provided the following additional information:</p> <ul style="list-style-type: none"> Line 299 – [REDACTED] corresponds to line 435 – [REDACTED]. Only one of those records was considered valid as the student numbers were identical (actual name is [REDACTED] per the University of Toronto student records) Line 435 – See above Line 2516 – [REDACTED] – This petitioner was considered valid in our final reported results. This record does not appear to be a duplicate, even though it was highlighted in blue, as there is no corresponding duplicate record. The fact that this record was highlighted in blue did not impact our final reported results as our reported results were based on the Excel formula outlined above.
8.	156	516	Best efforts to confer with Mr. Youssef to determine whether any discussions with members of CFS or CFSO occurred as to the decision to discount 91 names as outlined at paragraph 21 of Mr. Hatherell's Affidavit.	With respect to petitioners who used an English variation of their foreign name, it was determined, based on discussions with CFS (National) and CFSO representatives, that those petitioners should not be considered valid as they did not use their "proper full name" as stipulated in the CFS (National) and CFSO Bylaws.

Tab	P.	Q.	Undertaking	Answer
				Information provided to us by the University of Toronto did not enable us to confirm that the English version of their name represented their "proper full name".
9.	158	529	To advise why [REDACTED] was deemed to be an invalid petitioner.	[REDACTED] was not considered a valid petitioner as she ([REDACTED]) did not use her "proper full name" on the petition as required by the CFS (National) and CFSO Bylaws.
10.	159	531	To advise why [REDACTED] was deemed to be a valid petitioner.	<p>[REDACTED] should not have been considered valid. We noted that, of the 15 petitioners within the CFSO petition who utilized a first initial to represent their first name (list provided below), our conclusions were as follows:</p> <ul style="list-style-type: none"> - 2 petitioners were considered invalid, as petitioner records did not agree to the University of Toronto Student records (highlighted in red below); - 10 petitioners were considered invalid as the petitioners did not use their "proper full name" as required by the CFSO Bylaws (highlighted in yellow below); and, - 3 petitioners were considered valid (not highlighted below). <p>The 3 petitioners that were considered valid should not have been considered valid as they did not use their "proper full name" as required by the CFSO Bylaws. If these 3 petitioners were considered invalid in our reported results, the percentage of valid petitioners would have been 19.51% as compared to the reported percentage of</p>

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Tab	P.	Q.	Undertaking	Answer
11.	165	547	Best efforts to determine and advise whether the final spreadsheets were provided to CFS and CFSO.	The final spreadsheets were not provided to CFS and CFSO representatives.
12.	165	550	To produce any other documentation that was provided to CFS and CFSO other than the spreadsheets and the final reports in association with the final report.	There were no other documents provided to CFS and CFSO.
13.	167	554	To advise if the evidence that a separate spreadsheet of the CFS petition was created is incorrect.	Yes, a separate spreadsheet was created for the CFS (National) petition.

Tab	P.	Q.	Under Advisement	Answer
1.	167	556	To produce the correspondence between Deloitte and the CFS between April 2 nd and April 7 th .	Please see the attached Exhibit B for email correspondence with CFS (National) that occurred between April 2 and 7, 2014.

No.	P.	Q.	Refusals	Basis for Refusal

CFS - National Petition:

[illegible]

[illegible]

[illegible]

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Ref#	First Name	Last Name	Student Number	CFS-National (Yes/No)	Unique signature (Yes/No)	Reasonably legible (Yes/No)	Proper full name (Yes/No)	Valid Student Number	Agreed to University records (name or student #) (Yes/No)
1	John	Smith	123456789	Yes	Yes	Yes	Yes	Yes	Yes
2	Jane	Smith	123456790	Yes	Yes	Yes	Yes	Yes	Yes
3	John	Smith	123456791	Yes	Yes	Yes	Yes	Yes	Yes
4	Jane	Smith	123456792	Yes	Yes	Yes	Yes	Yes	Yes
5	John	Smith	123456793	Yes	Yes	Yes	Yes	Yes	Yes
6	Jane	Smith	123456794	Yes	Yes	Yes	Yes	Yes	Yes
7	John	Smith	123456795	Yes	Yes	Yes	Yes	Yes	Yes
8	Jane	Smith	123456796	Yes	Yes	Yes	Yes	Yes	Yes
9	John	Smith	123456797	Yes	Yes	Yes	Yes	Yes	Yes
10	Jane	Smith	123456798	Yes	Yes	Yes	Yes	Yes	Yes
11	John	Smith	123456799	Yes	Yes	Yes	Yes	Yes	Yes
12	Jane	Smith	123456800	Yes	Yes	Yes	Yes	Yes	Yes
13	John	Smith	123456801	Yes	Yes	Yes	Yes	Yes	Yes
14	Jane	Smith	123456802	Yes	Yes	Yes	Yes	Yes	Yes
15	John	Smith	123456803	Yes	Yes	Yes	Yes	Yes	Yes
16	Jane	Smith	123456804	Yes	Yes	Yes	Yes	Yes	Yes
17	John	Smith	123456805	Yes	Yes	Yes	Yes	Yes	Yes
18	Jane	Smith	123456806	Yes	Yes	Yes	Yes	Yes	Yes
19	John	Smith	123456807	Yes	Yes	Yes	Yes	Yes	Yes
20	Jane	Smith	123456808	Yes	Yes	Yes	Yes	Yes	Yes
21	John	Smith	123456809	Yes	Yes	Yes	Yes	Yes	Yes
22	Jane	Smith	123456810	Yes	Yes	Yes	Yes	Yes	Yes
23	John	Smith	123456811	Yes	Yes	Yes	Yes	Yes	Yes
24	Jane	Smith	123456812	Yes	Yes	Yes	Yes	Yes	Yes
25	John	Smith	123456813	Yes	Yes	Yes	Yes	Yes	Yes
26	Jane	Smith	123456814	Yes	Yes	Yes	Yes	Yes	Yes
27	John	Smith	123456815	Yes	Yes	Yes	Yes	Yes	Yes
28	Jane	Smith	123456816	Yes	Yes	Yes	Yes	Yes	Yes
29	John	Smith	123456817	Yes	Yes	Yes	Yes	Yes	Yes
30	Jane	Smith	123456818	Yes	Yes	Yes	Yes	Yes	Yes
31	John	Smith	123456819	Yes	Yes	Yes	Yes	Yes	Yes
32	Jane	Smith	123456820	Yes	Yes	Yes	Yes	Yes	Yes
33	John	Smith	123456821	Yes	Yes	Yes	Yes	Yes	Yes
34	Jane	Smith	123456822	Yes	Yes	Yes	Yes	Yes	Yes
35	John	Smith	123456823	Yes	Yes	Yes	Yes	Yes	Yes
36	Jane	Smith	123456824	Yes	Yes	Yes	Yes	Yes	Yes
37	John	Smith	123456825	Yes	Yes	Yes	Yes	Yes	Yes
38	Jane	Smith	123456826	Yes	Yes	Yes	Yes	Yes	Yes
39	John	Smith	123456827	Yes	Yes	Yes	Yes	Yes	Yes
40	Jane	Smith	123456828	Yes	Yes	Yes	Yes	Yes	Yes
41	John	Smith	123456829	Yes	Yes	Yes	Yes	Yes	Yes
42	Jane	Smith	123456830	Yes	Yes	Yes	Yes	Yes	Yes
43	John	Smith	123456831	Yes	Yes	Yes	Yes	Yes	Yes
44	Jane	Smith	123456832	Yes	Yes	Yes	Yes	Yes	Yes
45	John	Smith	123456833	Yes	Yes	Yes	Yes	Yes	Yes
46	Jane	Smith	123456834	Yes	Yes	Yes	Yes	Yes	Yes
47	John	Smith	123456835	Yes	Yes	Yes	Yes	Yes	Yes
48	Jane	Smith	123456836	Yes	Yes	Yes	Yes	Yes	Yes
49	John	Smith	123456837	Yes	Yes	Yes	Yes	Yes	Yes
50	Jane	Smith	123456838	Yes	Yes	Yes	Yes	Yes	Yes
51	John	Smith	123456839	Yes	Yes	Yes	Yes	Yes	Yes
52	Jane	Smith	123456840	Yes	Yes	Yes	Yes	Yes	Yes
53	John	Smith	123456841	Yes	Yes	Yes	Yes	Yes	Yes
54	Jane	Smith	123456842	Yes	Yes	Yes	Yes	Yes	Yes
55	John	Smith	123456843	Yes	Yes	Yes	Yes	Yes	Yes
56	Jane	Smith	123456844	Yes	Yes	Yes	Yes	Yes	Yes
57	John	Smith	123456845	Yes	Yes	Yes	Yes	Yes	Yes
58	Jane	Smith	123456846	Yes	Yes	Yes	Yes	Yes	Yes
59	John	Smith	123456847	Yes	Yes	Yes	Yes	Yes	Yes
60	Jane	Smith	123456848	Yes	Yes	Yes	Yes	Yes	Yes
61	John	Smith	123456849	Yes	Yes	Yes	Yes	Yes	Yes
62	Jane	Smith	123456850	Yes	Yes	Yes	Yes	Yes	Yes
63	John	Smith	123456851	Yes	Yes	Yes	Yes	Yes	Yes
64	Jane	Smith	123456852	Yes	Yes	Yes	Yes	Yes	Yes
65	John	Smith	123456853	Yes	Yes	Yes	Yes	Yes	Yes
66	Jane	Smith	123456854	Yes	Yes	Yes	Yes	Yes	Yes
67	John	Smith	123456855	Yes	Yes	Yes	Yes	Yes	Yes
68	Jane	Smith	123456856	Yes	Yes	Yes	Yes	Yes	Yes
69	John	Smith	123456857	Yes	Yes	Yes	Yes	Yes	Yes
70	Jane	Smith	123456858	Yes	Yes	Yes	Yes	Yes	Yes
71	John	Smith	123456859	Yes	Yes	Yes	Yes	Yes	Yes
72	Jane	Smith	123456860	Yes	Yes	Yes	Yes	Yes	Yes
73	John	Smith	123456861	Yes	Yes	Yes	Yes	Yes	Yes
74	Jane	Smith	123456862	Yes	Yes	Yes	Yes	Yes	Yes
75	John	Smith	123456863	Yes	Yes	Yes	Yes	Yes	Yes
76	Jane	Smith	123456864	Yes	Yes	Yes	Yes	Yes	Yes
77	John	Smith	123456865	Yes	Yes	Yes	Yes	Yes	Yes
78	Jane	Smith	123456866	Yes	Yes	Yes	Yes	Yes	Yes
79	John	Smith	123456867	Yes	Yes	Yes	Yes	Yes	Yes
80	Jane	Smith	123456868	Yes	Yes	Yes	Yes	Yes	Yes
81	John	Smith	123456869	Yes	Yes	Yes	Yes	Yes	Yes
82	Jane	Smith	123456870	Yes	Yes	Yes	Yes	Yes	Yes
83	John	Smith	123456871	Yes	Yes	Yes	Yes	Yes	Yes
84	Jane	Smith	123456872	Yes	Yes	Yes	Yes	Yes	Yes
85	John	Smith	123456873	Yes	Yes	Yes	Yes	Yes	Yes
86	Jane	Smith	123456874	Yes	Yes	Yes	Yes	Yes	Yes
87	John	Smith	123456875	Yes	Yes	Yes	Yes	Yes	Yes
88	Jane	Smith	123456876	Yes	Yes	Yes	Yes	Yes	Yes
89	John	Smith	123456877	Yes	Yes	Yes	Yes	Yes	Yes
90	Jane	Smith	123456878	Yes	Yes	Yes	Yes	Yes	Yes
91	John	Smith	123456879	Yes	Yes	Yes	Yes	Yes	Yes
92	Jane	Smith	123456880	Yes	Yes	Yes	Yes	Yes	Yes
93	John	Smith	123456881	Yes	Yes	Yes	Yes	Yes	Yes
94	Jane	Smith	123456882	Yes	Yes	Yes	Yes	Yes	Yes
95	John	Smith	123456883	Yes	Yes	Yes	Yes	Yes	Yes
96	Jane	Smith	123456884	Yes	Yes	Yes	Yes	Yes	Yes
97	John	Smith	123456885	Yes	Yes	Yes	Yes	Yes	Yes
98	Jane	Smith	123456886	Yes	Yes	Yes	Yes	Yes	Yes
99	John	Smith	123456887	Yes	Yes	Yes	Yes	Yes	Yes
100	Jane	Smith	123456888	Yes	Yes	Yes	Yes	Yes	Yes

[illegible]

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Ref#	First Name	Last Name	Student Number	CFS-National (Yes/No)	Unique signature (Yes/No)	Reasonably legible (Yes/No)	Proper full name (Yes/No)	Valid Student Number	Agreed to University records (name or student #) (Yes/No)
1	John	Doe	123456789	Yes	Yes	Yes	Yes	Yes	Yes
2	Jane	Smith	987654321	No	No	No	No	No	No
3	Michael	Johnson	456789012	Yes	Yes	Yes	Yes	Yes	Yes
4	Sarah	Williams	321098765	No	No	No	No	No	No
5	David	Brown	210987654	Yes	Yes	Yes	Yes	Yes	Yes
6	Emily	Green	109876543	No	No	No	No	No	No
7	Robert	Miller	098765432	Yes	Yes	Yes	Yes	Yes	Yes
8	Laura	Wilson	987654321	No	No	No	No	No	No
9	James	Moore	876543210	Yes	Yes	Yes	Yes	Yes	Yes
10	Amanda	Taylor	765432109	No	No	No	No	No	No
11	Christopher	Anderson	654321098	Yes	Yes	Yes	Yes	Yes	Yes
12	Nicole	Thomas	543210987	No	No	No	No	No	No
13	Kevin	Clark	432109876	Yes	Yes	Yes	Yes	Yes	Yes
14	Stephanie	White	321098765	No	No	No	No	No	No
15	Brandon	Black	210987654	Yes	Yes	Yes	Yes	Yes	Yes
16	Kyle	Gray	109876543	No	No	No	No	No	No
17	Michelle	King	098765432	Yes	Yes	Yes	Yes	Yes	Yes
18	Eric	Wright	987654321	No	No	No	No	No	No
19	Angela	Scott	876543210	Yes	Yes	Yes	Yes	Yes	Yes
20	Gregory	Green	765432109	No	No	No	No	No	No
21	Heather	Adams	654321098	Yes	Yes	Yes	Yes	Yes	Yes
22	Timothy	Baker	543210987	No	No	No	No	No	No
23	Rebecca	Nelson	432109876	Yes	Yes	Yes	Yes	Yes	Yes
24	Benjamin	Phillips	321098765	No	No	No	No	No	No
25	Samantha	Carter	210987654	Yes	Yes	Yes	Yes	Yes	Yes
26	Jonathan	Mitchell	109876543	No	No	No	No	No	No
27	Kristen	Perez	098765432	Yes	Yes	Yes	Yes	Yes	Yes
28	Adam	Roberts	987654321	No	No	No	No	No	No
29	Christina	Turner	876543210	Yes	Yes	Yes	Yes	Yes	Yes
30	Nathan	Young	765432109	No	No	No	No	No	No
31	Victoria	Allen	654321098	Yes	Yes	Yes	Yes	Yes	Yes
32	Justin	King	543210987	No	No	No	No	No	No
33	Megan	Wright	432109876	Yes	Yes	Yes	Yes	Yes	Yes
34	Andrew	Scott	321098765	No	No	No	No	No	No
35	Olivia	Green	210987654	Yes	Yes	Yes	Yes	Yes	Yes
36	Isaac	Black	109876543	No	No	No	No	No	No
37	Chloe	Gray	098765432	Yes	Yes	Yes	Yes	Yes	Yes
38	Ethan	White	987654321	No	No	No	No	No	No
39	Alexis	Black	876543210	Yes	Yes	Yes	Yes	Yes	Yes
40	Logan	White	765432109	No	No	No	No	No	No
41	Madison	Black	654321098	Yes	Yes	Yes	Yes	Yes	Yes
42	Caleb	White	543210987	No	No	No	No	No	No
43	Abigail	Black	432109876	Yes	Yes	Yes	Yes	Yes	Yes
44	Wyatt	White	321098765	No	No	No	No	No	No
45	Skylar	Black	210987654	Yes	Yes	Yes	Yes	Yes	Yes
46	Grayson	White	109876543	No	No	No	No	No	No
47	Kennedy	Black	098765432	Yes	Yes	Yes	Yes	Yes	Yes
48	Nolan	White	987654321	No	No	No	No	No	No
49	Brooklyn	Black	876543210	Yes	Yes	Yes	Yes	Yes	Yes
50	Easton	White	765432109	No	No	No	No	No	No
51	Savannah	Black	654321098	Yes	Yes	Yes	Yes	Yes	Yes
52	Jaxon	White	543210987	No	No	No	No	No	No
53	Isabella	Black	432109876	Yes	Yes	Yes	Yes	Yes	Yes
54	Lincoln	White	321098765	No	No	No	No	No	No
55	Charlotte	Black	210987654	Yes	Yes	Yes	Yes	Yes	Yes
56	Robert	White	109876543	No	No	No	No	No	No
57	Christina	Black	098765432	Yes	Yes	Yes	Yes	Yes	Yes
58	Nathan	White	987654321	No	No	No	No	No	No
59	Victoria	Black	876543210	Yes	Yes	Yes	Yes	Yes	Yes
60	Nathan	White	765432109	No	No	No	No	No	No
61	Madison	Black	654321098	Yes	Yes	Yes	Yes	Yes	Yes
62	Caleb	White	543210987	No	No	No	No	No	No
63	Abigail	Black	432109876	Yes	Yes	Yes	Yes	Yes	Yes
64	Wyatt	White	321098765	No	No	No	No	No	No
65	Skylar	Black	210987654	Yes	Yes	Yes	Yes	Yes	Yes
66	Grayson	White	109876543	No	No	No	No	No	No
67	Kennedy	Black	098765432	Yes	Yes	Yes	Yes	Yes	Yes
68	Nolan	White	987654321	No	No	No	No	No	No
69	Brooklyn	Black	876543210	Yes	Yes	Yes	Yes	Yes	Yes
70	Easton	White	765432109	No	No	No	No	No	No
71	Savannah	Black	654321098	Yes	Yes	Yes	Yes	Yes	Yes
72	Jaxon	White	543210987	No	No	No	No	No	No
73	Isabella	Black	432109876	Yes	Yes	Yes	Yes	Yes	Yes
74	Lincoln	White	321098765	No	No	No	No	No	No
75	Charlotte	Black	210987654	Yes	Yes	Yes	Yes	Yes	Yes
76	Robert	White	109876543	No	No	No	No	No	No
77	Christina	Black	098765432	Yes	Yes	Yes	Yes	Yes	Yes
78	Nathan	White	987654321	No	No	No	No	No	No
79	Victoria	Black	876543210	Yes	Yes	Yes	Yes	Yes	Yes
80	Nathan	White	765432109	No	No	No	No	No	No
81	Madison	Black	654321098	Yes	Yes	Yes	Yes	Yes	Yes
82	Caleb	White	543210987	No	No	No	No	No	No
83	Abigail	Black	432109876	Yes	Yes	Yes	Yes	Yes	Yes
84	Wyatt	White	321098765	No	No	No	No	No	No
85	Skylar	Black	210987654	Yes	Yes	Yes	Yes	Yes	Yes
86	Grayson	White	109876543	No	No	No	No	No	No
87	Kennedy	Black	098765432	Yes	Yes	Yes	Yes	Yes	Yes
88	Nolan	White	987654321	No	No	No	No	No	No
89	Brooklyn	Black	876543210	Yes	Yes	Yes	Yes	Yes	Yes
90	Easton	White	765432109	No	No	No	No	No	No
91	Savannah	Black	654321098	Yes	Yes	Yes	Yes	Yes	Yes
92	Jaxon	White	543210987	No	No	No	No	No	No
93	Isabella	Black	432109876	Yes	Yes	Yes	Yes	Yes	Yes
94	Lincoln	White	321098765	No	No	No	No	No	No
95	Charlotte	Black	210987654	Yes	Yes	Yes	Yes	Yes	Yes
96	Robert	White	109876543	No	No	No	No	No	No
97	Christina	Black	098765432	Yes	Yes	Yes	Yes	Yes	Yes
98	Nathan	White	987654321	No	No	No	No	No	No
99	Victoria	Black	876543210	Yes	Yes	Yes	Yes	Yes	Yes
100	Nathan	White	765432109	No	No	No	No	No	No

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Ref#	First Name	Last Name	Student Number	CFS-National (Yes/No)	Unique signature (Yes/No)	Reasonably legible (Yes/No)	Proper full name (Yes/No)	Valid Student Number	Agreed to University records (name or student #) (Yes/No)
1	1	1	1						
2	2	2	2						
3	3	3	3						
4	4	4	4						
5	5	5	5						
6	6	6	6						
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98	98	98	98						
99	99	99	99						
100	100	100	100						

Youssef, T. Yasser (CA - Toronto)

Exhibit B

From: Vanessa Hunt <v.hunt@cfs-fcee.ca>
Sent: Wednesday, April 2, 2014 2:02 PM
To: Youssef, T. Yasser (CA - Toronto)
Subject: CFS National Petition

Follow Up Flag: Follow up
Flag Status: Completed

Hello Yasser,

It has been brought to our attention that there is a discrepancy between the number of signatures that your office verified on the national petition and the number of signatures that was reviewed by the registrar's office, possibly due to human error during the photocopying process.

Could your office go through the original petition and compare it to the copy we sent you to see if pages were missing and if so verify the names in same manner that was conducted with the initial copy? I can send it off immediately and have it delivered to your office by tomorrow.

We want to be as thorough as possible and ensure that the results provided to the membership are completely accurate.

Thank you for your assistance in this process and please feel free to contact me should you have any questions.

Regards,

Vanessa Hunt

National Deputy Chairperson | Vice-présidente Nationale
Canadian Federation of Students |
Fédération canadienne des étudiantes et étudiants
www.cfs-fcee.ca
w. 613.232.7394 x 224
e. v.hunt@cfs-fcee.ca

Youssef, T. Yasser (CA - Toronto)

From: Youssef, T. Yasser (CA - Toronto)
Sent: Wednesday, April 2, 2014 2:06 PM
To: 'Vanessa Hunt'
Cc: Hatherell, Terry (CA - Toronto)
Subject: RE: CFS National Petition

Hi Vanessa,

When I spoke to Jeremy I had my concerns that the photocopy wasn't complete for the national petition. Please send it through and we work to verify the list right away. In our engagement letter we had assumed that the two petitions were consistent and our focus would be on the Ontario petition...so we did keep our focus on that one. However, please send it through and we'll review it right away.

Thanks,

Yasser

From: Vanessa Hunt [mailto:v.hunt@cfs-fcee.ca]
Sent: Wednesday, April 02, 2014 2:02 PM
To: Youssef, T. Yasser (CA - Toronto)
Subject: CFS National Petition

Hello Yasser,

It has been brought to our attention that there is a discrepancy between the number of signatures that your office verified on the national petition and the number of signatures that was reviewed by the registrar's office, possibly due to human error during the photocopying process.

Could your office go through the original petition and compare it to the copy we sent you to see if pages were missing and if so verify the names in same manner that was conducted with the initial copy? I can send it off immediately and have it delivered to your office by tomorrow.

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Regards,

Vanessa Hunt

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Yasser (CA - Toronto)

Youssef, T. Yasser (CA - Toronto)
Thursday, April 3, 2014 11:06 AM
'Vanessa Hunt'
RE: CFS National Petition

Subject:

Hi Vanessa,

We have received the petition and we will go through it right away.

Thanks,

Yasser

From: Vanessa Hunt [mailto:v.hunt@cfs-fcee.ca]
Sent: Wednesday, April 02, 2014 2:02 PM
To: Youssef, T. Yasser (CA - Toronto)
Subject: CFS National Petition

Hello Yasser,

It has been brought to our attention that there is a discrepancy between the number of signatures that your office verified on the national petition and the number of signatures that was reviewed by the registrar's office, possibly due to human error during the photocopying process.

Could your office go through the original petition and compare it to the copy we sent you to see if pages were missing and if so verify the names in same manner that was conducted with the initial copy? I can send it off immediately and have it delivered to your office by tomorrow.

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Regards,

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e. v.hunt@cfs-fcee.ca

Youssef, T. Yasser (CA - Toronto)

From: Youssef, T. Yasser (CA - Toronto)
Sent: Monday, April 7, 2014 11:31 AM
To: 'Vanessa Hunt'
Cc: Hatherell, Terry (CA - Toronto)
Subject: RE: CFS National Petition

Hi Vanessa,

I hope all is well. We have completed the validation procedures over the CFS (National) petition. We have added the missing pages, as discussed, and performed a separate validation exercise over the CFS (National) petition (we did not use the CFS-ON petition as the bases for our validation procedures as outlined in our original engagement letter). As discussed, this will results in an additional \$2,000 in fees.

Overall, valid petitions were 19.53% of the University of Toronto Student Union records. We have highlighted the results of our validation procedures below for your reference.

Thank you Vanessa and please don't hesitate to contact me if you have any questions. I will also return the original CFS (Nationa) petition to you for your records as well as a revised final report.

Regards,

Yasser

Attributes	Observations
Submitted by member of the University of Toronto Graduate Students' Union:	Yes - Submitted by Ms. Ashleigh Ingle – a member of the University of Toronto Graduate Student Union
Total number of names submitted	3,384
Exceptions, based on petitioner requirements:	
• Not members of Graduate Students' Union, based on information provided	336
• Duplicate records	37
• Not "reasonably legible"	NA
• Did not include "proper full name"	80
• Did not include a "valid student identification number"	10
• Did not include a "unique signature"	6
Twenty percent threshold	
• Total population of Graduate Students' Union members*	14,927
• Valid petitioners (based on above)	2,915
• % of Graduate Students' Union members	19.53%

*Based on Graduate Student's Union records provided by the University of Toronto

From: Vanessa Hunt [mailto:v.hunt@cfs-fcee.ca]
Sent: Wednesday, April 02, 2014 2:02 PM
To: Youssef, T. Yasser (CA - Toronto)
Subject: CFS National Petition

Hello Yasser,

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e. v.hunt@cfs-fcee.ca

Youssef, T. Yasser (CA - Toronto)

From: Youssef, T. Yasser (CA - Toronto)
Sent: Monday, April 7, 2014 11:40 AM
To: 'Vanessa Hunt'
Cc: Hatherell, Terry (CA - Toronto)
Subject: RE: CFS National Petition

Hi Vanessa,

I also just left you a voice mail. One of the items that I did want to discuss with you related to Chinese petitioners (approximately 75 - 80 instances) who signed the petition using their Canadian names. We have not considered those petitions valid (consistent with CFS-ON). If we were to consider them valid, however, in the case of CFS (National) the 20% threshold would be exceeded.

Thanks Vanessa, and please feel free to call me at any time.

Regards,

Yasser

T. Yasser Youssef
Deloitte
Tel/Direct 647-938-2026
www.deloitte.ca

From: Youssef, T. Yasser (CA - Toronto)
Sent: Monday, April 07, 2014 11:31 AM
To: 'Vanessa Hunt'
Cc: Hatherell, Terry (CA - Toronto)
Subject: RE: CFS National Petition

Hi Vanessa,

I hope all is well. We have completed the validation procedures over the CFS (National) petition. We have added the missing pages, as discussed, and performed a separate validation exercise over the CFS (National) petition (we did not use the CFS-ON petition as the bases for our validation procedures as outlined in our original engagement letter). As discussed, this will results in an additional \$2,000 in fees.

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Thank you Vanessa and please don't hesitate to contact me if you have any questions. I will also return the original CFS (Nationa) petition to you for your records as well as a revised final report.

Regards,

Yasser

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• Valid petitioners (based on above)	2,915
• % of Graduate Students' Union members	19.53%

*Based on Graduate Student's Union records provided by the University of Toronto

From: Vanessa Hunt [<mailto:v.hunt@cfs-fcee.ca>]

Sent: Wednesday, April 02, 2014 2:02 PM

To: Youssef, T. Yasser (CA - Toronto)

Subject: CFS National Petition

Hello Yasser,

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Vanessa Hunt

National Deputy Chairperson | Vice-présidente Nationale

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e. v.hunt@cfs-fcee.ca

Youssef, T. Yasser (CA - Toronto)

From: Youssef, T. Yasser (CA - Toronto)
Sent: Monday, April 7, 2014 8:38 PM
To: 'Vanessa Hunt'
Cc: Hatherell, Terry (CA - Toronto)
Subject: RE: CFS National Petition
Attachments: CFS National_Petition Validation Results Report_04-07-2014_Updated.pdf

Hi Vanessa,

As promised, attached please find the updated CFS (National) petition validation report for your review and comment. We did not provide a range of results in this instance as the results were very close to the 20% threshold and we wanted to provide more clarity.

Thank you once again Vanessa and please don't hesitate to contact me at any time if you have any questions or would like to discuss the results further.

Regards,

Yasser

From: Youssef, T. Yasser (CA - Toronto)
Sent: Monday, April 07, 2014 11:40 AM
To: 'Vanessa Hunt'
Cc: Hatherell, Terry (CA - Toronto)
Subject: RE: CFS National Petition

Hi Vanessa,

I also just left you a voice mail. One of the items that I did want to discuss with you related to Chinese petitioners (approximately 75 - 80 instances) who signed the petition using their Canadian names. We have not considered those petitions valid (consistent with CFS-ON). If we were to consider them valid, however, in the case of CFS (National) the 20% threshold would be exceeded.

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Regards,

Yasser

T. Yasser Youssef
Deloitte
Tel/Direct 647-938-2026
www.deloitte.ca

From: Youssef, T. Yasser (CA - Toronto)
Sent: Monday, April 07, 2014 11:31 AM
To: 'Vanessa Hunt'
Cc: Hatherell, Terry (CA - Toronto)
Subject: RE: CFS National Petition

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Yasser

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• Valid petitioners (based on above)	2,915
• % of Graduate Students' Union members	19.53%

*Based on Graduate Student's Union records provided by the University of Toronto

From: Vanessa Hunt [<mailto:v.hunt@cfs-fcee.ca>]

Sent: Wednesday, April 02, 2014 2:02 PM

To: Youssef, T. Yasser (CA - Toronto)

Subject: CFS National Petition

Hello Yasser,

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Thank you for your assistance in this process and please feel free to contact me should you have any questions.

Regards,

Vanessa Hunt

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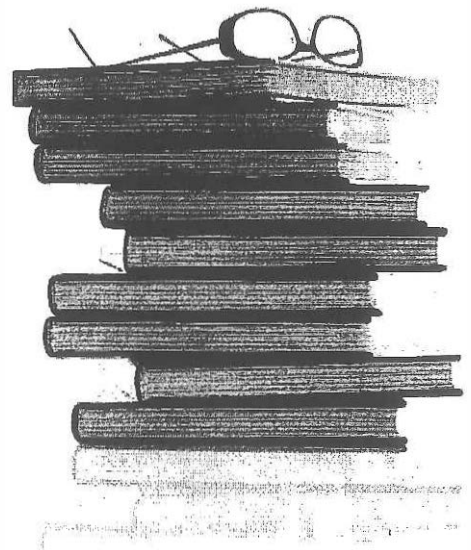
e. v.hunt@cfs-fcee.ca

Deloitte.

Canadian Federation of Students (National) Petition validation procedures

Results of validation procedures over the University of Toronto Graduate
Students' Union petition to the Canadian Federation of Students (National)
seeking a vote on the question of continued membership

April 2014



Background

The Canadian Federation of Students (National) (CFS) requested assistance with certain validation procedures over a petition submitted by the University of Toronto Graduate Students' Union members, seeking a vote on the question of continued membership. The validation procedures requested were designed to assess the validity and integrity of the petition submitted in accordance with the following CFS Bylaws:

- **General**
 - CFS Bylaw I dealing with membership issues, including the process for certifying and decertifying. Specifically CFS Bylaw I, Section 6 which outlines the requirements to initiate a vote on decertification.
- **Petitioner requirements**
 - CFS Bylaw I, Section 6.a stipulates that in order to be valid, a name on a petition must be reasonably legible, include the proper full name, be accompanied by a valid and corresponding student identification number and a unique signature.
- **Twenty percent threshold**
 - CFS Bylaw I, Section 3.a.iii establishes that a petition calling for a vote on decertification must be signed by no less than twenty percent (20%) of the individual members of the member local association.

Scope and objectives

The primary objective of the validation procedures requested and performed was to determine whether the petition submitted met the requirements stipulated in the above CFS Bylaws. As discussed and agreed to with CFS, Deloitte performed the following key activities:

- Validated that the petition was submitted by a member of the University of Toronto Graduate Students' Union;
- Converted a copy of the petition provided by CFS into an analytics-readable format (i.e. Excel) and assessed whether the names on the petitions were reasonably legible;
- Reviewed the signatures contained within the petition provided by CFS for reasonableness to assess whether each signature appeared to be unique;
- Utilized data analytics techniques to verify/cross-reference the names on the petition submitted with University of Toronto student records (i.e. student names and student numbers) provided to us by the University of Toronto;
- Utilized data analytics techniques to review the petitions for duplicate student names and student numbers; and,
- Provided the total number of valid petitioners, based on the procedures performed, to CFS for their consideration.

Summary results

The table below outlines the results of our procedures performed for CFS's consideration:

Attributes	Observations
Submitted by member of the University of Toronto Graduate Students' Union:	Yes - Submitted by Ms. Ashleigh Ingle -- a member of the University of Toronto Graduate Student Union
Total number of names submitted	3,384
Exceptions, based on petitioner requirements:	
• Did not agree to Graduate Students' Union records*, based on information provided	336
• Duplicate records	37
• Did not include "proper full name"	80
• Did not include a "valid student identification number"	10
• Did not include a "unique signature"	6
Twenty percent threshold	
• Total population of Graduate Students' Union members*	14,927
• Valid petitioners (based on above)	2915
• % of Graduate Students' Union members	19.53%

*Based on Graduate Students' Union records provided by the University of Toronto

Our performance of the above-noted procedures did not constitute an audit and, accordingly, did not result in the expression of an opinion or any other form of assurance on the validity and integrity of the petition submitted by the University of Toronto Graduate Students' Union members.



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