



Alejandra Bravo

CITY COUNCILLOR
WARD 9 • DAVENPORT

CHAIR, ECONOMIC & COMMUNITY
DEVELOPMENT COMMITTEE

May 8th, 2025

John Elvidge
City Clerk
Toronto City Hall
100 Queen St W
Toronto, ON M5H 2N2

RE: Administrative Inquiry Regarding the Development of the Proposed Demonstrations Bylaw

Dear Mr. Elvidge,

I am submitting this Administrative Inquiry under Municipal Code Section 27-7.11 for the May 21, 2025 meeting of Toronto City Council.

In anticipation of the discussion at the May 21st Council meeting of a “Proposed Demonstrations Bylaw to Protect Vulnerable Institutions,” I am writing with the hope that you may provide answers to some of the basic questions that many Councillors, members of the public, and civil society have raised.

There are key outstanding questions about the process and implementation of a potential by-law. These include cost, legal risk, and overlap with existing laws and authorities.

The proposed by-law touches on fundamental issues at the very core of our democratic society. It is a debate on issues not normally considered by a municipal government.

This debate will no doubt be charged and having an established set of facts about potential cost, both of enforcement and of any legal challenges, as well as operational directives, will allow Councillors to focus their questions and proceed to a more elevated debate on the issue.

I look forward to the answers to these questions and look forward to the discussion at Council.

1. What tools already exist (through the Criminal Code, municipal bylaws, municipal use of trespass notices, etc.) to achieve the stated goal of ‘protecting vulnerable institutions?’ How was the application of those other tools assessed and weighed against a proposed bylaw?

2. What tests have been employed to determine if the existing tools were insufficient to provide protection? What literature (including Charter analyses, court records, and expert opinions) has been used to make the assessment and to design the tests?
3. How have City of Toronto staff evaluated the likelihood of a legal challenge to a proposed demonstration bylaw and its alignment with protections under the Charter of Rights and Freedoms?
4. What are the legal opinions from the City Solicitor and any external legal advice (if applicable), in full, which have been provided to the City in the development of the proposed by-law?
5. What are the potential costs associated with the City of Toronto defending the bylaw against a Charter challenge? How have those costs been estimated? Are there additional non-monetary risks to factor into account?
6. What tests or analysis did staff use to determine the threshold for enforcement of the proposed bylaw? What ongoing tests will be employed to determine a need for enforcement?
7. Should the proposed demonstrations by-law come into force, who will authorize enforcement and what criteria are recommended to be used?
8. Which City Division is recommended to enforce the bylaw? Has that Division confirmed they would have the necessary budgetary resources to enforce the bylaw?
9. How has Toronto Police Service and/or the Toronto Police Service Board been involved in the development of the draft bylaw?
10. What are the budgetary implications of enforcement of the bylaw? If exact costs cannot be estimated, what is the estimated range of the financial impact?

Respectfully submitted,

Alejandra Bravo
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