

councilmeeting

From: Colin Wood <colin@torontomu.ca>
Sent: May 15, 2025 9:17 PM
To: councilmeeting
Cc: Clerk
Subject: [External Sender] Re: RE: Legal Clinics Open Letter Opposing Proposed "Bubble Zone" Bylaw
Attachments: 2025-05-14 Legal Clinics Open Letter re Proposed Toronto Protest Bylaw.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Good day,

Thank you for your note. Please attach our correspondence to Item 2025.CC30.5 - Proposed By-law Amendment to Provide Access to Social Infrastructure, before City Council on May 21, 22, and 23, 2025.

Yours truly,
Colin Wood

Colin Wood (he/him)
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On May 15, 2025 at 4:22:50 PM, councilmeeting <councilmeeting@toronto.ca> wrote:

Good day,

Thank you for your email, however, we kindly ask that you note the **agenda item number** you are specifically referring to, so we may accept your communication as a submission.

Please see the link below for more information on submitting comments to meetings of Council and Committees:

<https://www.toronto.ca/city-government/council/council-committee-meetings/have-your-say/>

Thank you,

Marjolaine Prudencio

City Clerk's Office

From: Colin Wood <colin@torontomu.ca>

Sent: May 14, 2025 3:27 PM

To: Mayor Chow <Mayor_Chow@toronto.ca>; Councillor Crisanti <councillor_crisanti@toronto.ca>; Councillor Holyday <Councillor_Holyday@toronto.ca>; Councillor Morley <Councillor_Morley@toronto.ca>; Councillor Perks <Councillor_Perks@toronto.ca>; Councillor Nunziata <Councillor_Nunziata@toronto.ca>; Councillor Pasternak <Councillor_Pasternak@toronto.ca>; Councillor Perruzza <Councillor_Perruzza@toronto.ca>; Councillor Colle8 <Councillor_Colle8@toronto.ca>; Councillor Bravo <Councillor_Bravo@toronto.ca>; Councillor Malik <Councillor_Malik@toronto.ca>; Councillor Saxe <Councillor_Saxe@toronto.ca>; Councillor Matlow <councillor_matlow@toronto.ca>; Councillor Moise <Councillor_Moise@toronto.ca>; Councillor Fletcher <councillor_fletcher@toronto.ca>; Councillor Chernos Lin <Councillor_ChernosLin@toronto.ca>; Councillor Burnside <Councillor_Burnside@toronto.ca>; Councillor Carroll <Councillor_Carroll@toronto.ca>; Councillor Cheng <Councillor_Cheng@toronto.ca>; Councillor Bradford <Councillor_Bradford@toronto.ca>; Councillor Kandavel <Councillor_Kandavel@toronto.ca>; Councillor Thompson <councillor_thompson@toronto.ca>; Councillor Mantas <Councillor_Mantas@toronto.ca>; Councillor Myers <Councillor_Myers@toronto.ca>; Councillor Ainslie <councillor_ainslie@toronto.ca>; Charrissa Klander <Charrissa.Klander2@toronto.ca>

Cc: councilmeeting <councilmeeting@toronto.ca>

Subject: [External Sender] Legal Clinics Open Letter Opposing Proposed "Bubble Zone" Bylaw

Dear Mayor Chow and Councillors,

I am writing to share the attached open letter, signed by 28 legal organizations and 75 individual signatories, opposing the proposed "Bubble Zone" bylaw that would restrict demonstrations near places of worship, faith-based schools, and cultural institutions. We understand that a report on this matter will be presented to you by city staff ahead of next week's Council meeting.

As outlined in our letter, we strongly urge you not to adopt the proposed restrictions.

We would welcome the opportunity to discuss our concerns with you further. Please contact me if you would like to arrange a conversation.

Yours truly,

Colin Wood

Colin Wood (he/him)

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May 14, 2025

Mayor Olivia Chow and Members of Toronto City Council
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Mayor Chow and Councillors:

RE: Proposed “Bubble Zone” Bylaw Restricting Demonstrations Near Places of Worship, Faith-Based Schools, and Cultural Institutions

Public demonstrations are not a nuisance – they are a lifeline for marginalized and equity-seeking communities in our city. We write as members of community legal clinics and legal organizations in the City of Toronto serving low-income and vulnerable Torontonians. Our clients and communities have little access to traditional halls of power. Public protest is often the *only* way they can shine a spotlight on injustices and demand change. Many of our clinics’ clients are themselves targets of hate, discrimination, and violence. We urge you to consider the grave harm that the proposed bylaw would inflict on those very communities it purports to protect. Far from protecting vulnerable people, this bylaw will silence and criminalize them.

From our point of view as lawyers and legal practitioners, the law is clear. The Canadian *Charter of Rights and Freedoms* enshrines freedom of expression (section 2(b)) and freedom of peaceful assembly (section 2(c)). Together, they protect activities like demonstrations, protests, rallies, sit-ins, and vigils. The very spaces this proposed bylaw seeks to restrict – our sidewalks, streets, and other public areas – have long been where ordinary people gather to make their voices heard. We echo the serious concerns raised by the Canadian Civil Liberties Association in its [April 1 letter](#) to you.

We are especially concerned by rhetoric that conflates protests with hate or danger. Peaceful protest, by its nature, can be loud, disruptive, and uncomfortable to witness – but that does not make it violent or criminal. Feeling disturbed or offended is never a legal justification to shut down someone’s expression. The Court of Appeal for Ontario made this abundantly clear in [Bracken v. Fort Erie](#). In that case, a town tried to ban a vociferous protester from public property because staff felt “unsafe” around him. The Court firmly rebuked this overreach, stating: “Violence is not the mere absence of civility... A person’s subjective feelings of disquiet, unease, and even fear, are not in themselves capable of ousting expression” from the protection of the *Charter*. As the Court observed, “[i]n a free and democratic society, citizens are not to be handcuffed and removed from public space traditionally used for the expression of dissent because of the discomfort their protest causes.”

The proposed bylaw is framed as a measure to keep Torontonians “safe from hate” by creating buffer zones around “vulnerable institutions” (such as places of worship, faith-based schools, and cultural centers). Hateful expression is morally unacceptable – but rather than target hateful expression, the proposed bylaw would create a sweeping ban on peaceful protest. Places of worship, schools, and other institutions perceived as vulnerable often engage in political speech and activity that may legitimately attract public protest.

Unfortunately, the draft policy contemplates an extremely broad restriction: it would apply to public areas like streets and sidewalks near a long list of sites encompassing every corner of the city. A conceptual map [prepared by Patrick Cain at TorontoToday.ca shows the scale of the prospective restriction](#) - it would become impossible to march down any major street in most corners of the city, and especially the downtown core, without encroaching on the proposed bubble zones.

The City’s public-facing materials claim the proposed bylaw is “[not intended to prohibit peaceful and lawful demonstrations](#),” yet that is precisely what it will do. By imposing bubble zones in public space, the bylaw would prohibit many lawful, non-violent protests in those zones merely because someone deems them offensive or disruptive.

Finally, we wish to highlight who will be most impacted if this bylaw is enacted. It will not be the purveyors of hate that are sidelined – it will be marginalized communities and their allies raising their voices for justice and liberation.

The stated impetus for this law has been the ongoing Palestinian solidarity demonstrations that have filled Toronto’s streets since October 2023. We have already heard one City Councillor characterize these largely peaceful mass protests as “[anarchy](#)” on our streets. Such exaggerated claims underscore our fear that the bylaw will be used to crack down on Palestinian solidarity protesters and other marginalized groups who are speaking up against oppression.

We cannot ignore the broader historical pattern: laws created to curb “offensive” protests are almost always used against the oppressed. Once a broad limit on protest is on the books, it is far too easy for authorities to apply it selectively to silence critics of the status quo. Our legal clinics have seen this firsthand. It is *our clients* – *Indigenous, Black, and other racialized people, unhoused people, newcomers, survivors of violence* – who get carded, ticketed, or arrested when public space is heavily regulated. If a new bylaw further empowers officers to disperse protesters based on a vaguely defined “nuisance” or perceived intimidation, we have no doubt it will be disproportionately used against those advocating for social change, not those spewing hate. This is a deeply troubling outcome that Council must avoid.

The right to be seen and heard in public spaces is especially vital for those who have been historically marginalized. We urge you to protect that right. Reject this overreaching bylaw,

and instead work hand-in-hand with communities on solutions that target actual harm without trammeling on peaceful dissent.

Yours truly,

Organizations

1. Legal Clinic at Lincoln Alexander School of Law, Toronto Metropolitan University
2. Parkdale Community Legal Services
3. Mississauga Community Legal Services
4. Rexdale Community Legal Clinic
5. Downsview Community Legal Services
6. Neighbourhood Legal Services
7. West Scarborough Community Legal Services
8. Community Legal Clinic of York Region
9. Kensington-Bellwoods Community Legal Services
10. Black Legal Action Centre
11. Advocacy Centre for Tenants Ontario
12. Landlord's Self-Help Centre
13. IAVGO Community Legal Clinic
14. Injured Workers Community Legal Clinic
15. South Asian Legal Clinic of Ontario
16. HIV & AIDS Legal Clinic Ontario (HALCO)
17. CFGT French Legal Aid Clinic
18. Community Justice Collective
19. HIV Legal Network
20. No More Silence
21. Injured Workers Action for Justice
22. Workers' Health and Safety Legal Clinic
23. University of Toronto Law Union (UTLU)
24. Law Union of Ontario
25. Policing Committee, Law Union of Ontario
26. Palestinian Canadian Congress
27. Osgoode Hall Law Union

28. Ontario Health Coalition

Individuals

1. Irina Ceric, Law Union/CJC/Windsor Law
2. Sandra Ka Hon Chu, HIV Legal Network
3. Vishmayaa Jeyamoorthy, Scarborough Community Legal Services
4. Dania Majid, lawyer, Advocacy Centre for Tenants Ontario
5. Sukhpreet Sangha, Downtown Legal Services
6. Seema Kavar, Downtown Legal Services
7. Maria Moradas, Mississauga Community Legal Services
8. Jessica Gadea Hawkins, Legal Clinic at Lincoln Alexander School of Law
9. Petrea McConvey, SCLS
10. Peter Gatti, PCLS
11. Sarah Beamish
12. Sana Fatima, Beamish Law
13. Lisa Giaccari, Legal Centre for Palestine
14. Claire Mummé, University of Windsor
15. Sheru Abdulhusein, Sher Legal
16. Rosalyn Martin
17. Jordan Tully
18. Jen Danch
19. Kim Veller
20. Garrett Zehr
21. Rhodes Thompson-Chase
22. Sarah Levinthal Shartal
23. Clifford Luyt, refugee lawyer
24. Linda Mitchell
25. Heath Soave
26. Thoby King, Lawyer
27. Iqra Rafique, Lawyer
28. Zach Morgenstern
29. Kate Macdonald, Paralegal

30. John No
31. Butterfly GoPaul
32. John McKinnon
33. Olivia Dooley
34. Chris Grawey
35. Arash Ghiassi, Lawyer
36. Nora Fathalipour, Nuance Legal PC
37. Joshua Sealy-Harrington, Community Justice Collective and Windsor Law
38. Sheelagh MacDonald, IWC
39. Ahmad Ezzeddine, HALCO
40. Tess Sheldon, Faculty of Law, University of Windsor
41. Rashedul Amin, Lawyer
42. Imbisat Chaudhry, SCLS
43. Peter Bird, Injured Workers Community Legal Clinic
44. Bhavin Bilimoria
45. Bonnie Heath, IWC
46. Ayesha Noorani
47. Jessica Chandrashekar
48. Kristen Lloyd, PCLS
49. Sang Hun Mun, IWA4J
50. Julie Broomfield, Victim Rights Advocate
51. Benjamin Hognestad
52. Emily Lee, PCLS Student
53. Rebecca Ward, Lawyer
54. Judy Hemming, Lawyer
55. Em Pedota, SCLS
56. Dawn Lafonte, Paralegal
57. Jocelynn Hiley
58. Alisha Riley, Client Support Worker, JFCY
59. Silvana Venegas, CSSP
60. Diana Padierna, LSHC
61. Aleks Ivovic
62. Katherine Wauthier, LSHC

- 63. Audrey Dwyer
- 64. Mary Gellatly, PCLS
- 65. Kelly Haggart
- 66. Christie McQuarrie
- 67. James Kafieh, Legal Clinic Lawyer
- 68. Ashley Somerville, LSHC
- 69. Valerie Eaton, Legal Clinic
- 70. Roy McMurtry, Legal Clinic
- 71. Zainab Syed
- 72. Ashley Wilson, Hamilton Community Legal Clinic
- 73. Mohamad Jamal Bsar, Staff Lawyer, Hamilton Community Legal Clinic
- 74. Emily O'Keefe, Hamilton Community Legal Clinic
- 75. Jessica Ponting, IAVGO