



1 Nicholas St., Suite 1210
P.O. Box 821, Stn. B
Ottawa, Canada K1P 5P9
Tel: (613) 241-5179
Fax: (613) 241-4758
Email: dwatch@web.net
Internet: <http://www.dwatch.ca>

Conflict of Interest and Ethics Commissioner Mary Dawson
Office of the Ethics Commissioner
Parliament of Canada
P.O. Box 16, Centre Block
22nd Floor, 66 Slater
Ottawa, Ontario
K1A 0A6
Fax: 613-995-7308

October 16, 2009

RE: Petition for investigation of, and rulings on, fundraising event involving Conservative Cabinet ministers and Conservative MPs and Rogers Communications Inc.

Dear Commissioner Dawson:

Democracy Watch is filing this petition to request, under the provisions of the federal *Conflict of Interest Act* and the *Conflict of Interest Code for Members of the House of Commons*, an investigation of and ruling on the participation of Conservative Cabinet ministers and MPs in a fundraising event that, according to information received by Democracy Watch, was held in the Owner's Box at the Rogers Centre on September 6, 2009.

If Rogers Communications Inc. (Rogers) made the significant contribution it appears that it made to at least one riding association of the Conservative Party of Canada (and possibly other Conservative riding associations and/or candidates) through the holding of the fundraising event at the Rogers Centre, Democracy Watch is also requesting a ruling requiring all Cabinet ministers and MPs who attended the event to recuse themselves from all decisions that affect Rogers.

The Situation

Democracy Watch has been provided with what appears to be a genuine copy of an invitation sent by email by Rick Dykstra, Parliamentary Secretary to the Minister of Citizenship and Immigration (since November 7, 2008) and Conservative MP (since January 23, 2006) for a fundraising event it appears was to benefit Mr. Dykstra's riding association, and indirectly the Conservative Party of Canada, and possibly other of its candidates and riding associations (Democracy Watch does not know if other Conservative MPs also sent out the invitation. Please see attached the copy of the email invitation.

The invitation states that the event was to be held in the Owner's Box at the Rogers Centre in which Mr. Dykstra would have "the opportunity to host 60 friends" and that "Included with your contribution to my federal association is a ticket to the game, access to the owner's suite, beverages and food during the entire game.". According to the Rogers Centre website, the Centre has been owned by Rogers since February 2005.

The email also states that invitees will have "the opportunity to attend batting practice, meet with the President of Blue Jay Operations, ministers from the federal government and players from the Blue Jays" baseball team. According to Rogers website, the Blue Jays team has been owned by Rogers since September 2000. Democracy Watch does not know which Blue Jays players were made available to meet attendees.

/1 . . .

Democracy Watch also does not know which (if any) Cabinet ministers actually attended the event.

Democracy Watch has been told by Rogers Centre staff that the Owner's Box cannot be rented, but that the Luxury Suites that are available for rent at the Rogers Centre (of which the Owner's Box is one) can be rented for approximately \$175 per person attending a Toronto Blue Jays game (which covers the costs of the game ticket and the rental of the suite -- any food or beverages cost extra).

Given that the Owner's Box cannot be rented, Democracy Watch's opinion is that the Conservatives could not have paid full value for the use of the Owner's Box, and that it is reasonable to conclude that the value of being able to hold an event in it is much greater than the per person rental cost for any of the other Luxury Suites which are available to the public for rental.

As well, Democracy Watch's opinion is that the other perks offered in return for the donation should add to the total value of the benefit provided to attendees.

Democracy Watch does not know whether Mr. Dykstra, his riding association, the Conservative Party of Canada or some other entity paid Rogers for these perks offered to attendees.

The invitation states, referring to attendees of the event, that "Your assistance and attendance is deeply appreciated. Fundraising is a key aspect to the success we have achieved in the last two elections and your commitment means a great deal."

It is not known if anyone at Rogers or the Rogers Centre provided any services in organizing the event, nor whether the Conservatives paid for any services provided. Democracy Watch contacted several members of the Canadian Society of Professional Event Planners and was told that the service of registering people for such an event has a commercial value of \$1,500 to \$2,000, and the services involved in overall organization of such an event have a commercial value of \$4,000 to \$5,000.

At the time of the reported fundraising event, Rogers Communications Inc. was registered under the federal *Lobbying Act* to lobby Canadian Heritage (PCH), Canadian Radio-television and Telecommunications Commission (CRTC), Foreign Affairs and International Trade Canada (DFAITC), Industry Canada (IC), Prime Minister's Office (PMO), Privy Council Office (PCO), Public Safety and Emergency Preparedness Canada, and the House of Commons and the Senate of Canada (Registration numbers 722074-4903-9 (in-house corporation registration) and 780389-11623-9 (Registration of consultant lobbyist Gerald Kerr-wilson on behalf of his client Rogers)).

Under these two registrations, Rogers has disclosed under the *Lobbying Act* several communications since March 2009 with public office holders who are covered by the *Conflict of Interest Act*, including on March 24th with Bill King, Chief of Staff, Minister of Industry (Communication number 4903-101577); on April 21st with Industry Minister Tony Clement and others (Communication number 4903-105134); and on May 13th with Heritage Minister James Moore and his Chief of Staff Ian Todd and his Senior Policy Advisor Tanya Peatt (Communication number 4903-110490).

Again, Democracy Watch does not know which (if any) Cabinet ministers actually attended the event.

Democracy Watch has searched Mr. Dykstra's website (<http://www.rickdykstra.ca>) and found no mention of the fundraising event, which seems to indicate that the invitation was sent to a select list of people, and not to all of Mr. Dykstra's constituents or to the general public.

The Law

(a) *Federal Conflict of Interest Act* purpose and "gifts and benefits" measures

The main purposes of the *Conflict of Interest Act* (the *Act* - 2006, c. 9, s. 2), which applies to Cabinet ministers (including Ministers of State and Parliamentary Secretaries), their staff, Cabinet appointees (including senior government officials), are as follows:

"3.(1)(a) establish clear conflict of interest and post-employment rules for public office holders;

(b) minimize the possibility of conflicts arising between the private interests and public duties of public office holders and provide for the resolution of those conflicts in the public interest should they arise;

- (c) provide the Conflict of Interest and Ethics Commissioner with the mandate to determine the measures necessary to avoid conflicts of interest and to determine whether a contravention of this Act has occurred. . . .”

With regard to gifts, the *Act* states that:

“Gifts and other advantages

- 11.(1) No public office holder or member of his or her family shall accept any gift or other advantage, including from a trust, that might reasonably be seen to have been given to influence the public office holder in the exercise of an official power, duty or function.

Exception

- (2) Despite subsection (1), a public office holder or member of his or her family may accept a gift or other advantage
- (a) that is permitted under the *Canada Elections Act*;
 - (b) that is given by a relative or friend; or
 - (c) that is received as a normal expression of courtesy or protocol, or is within the customary standards that normally accompany the public office holder’s position.”

The *Act* defines “gift or other advantage” as:

- “2.(1)(a) an amount of money if there is no obligation to repay it; and
- (b) a service or property, or the use of property or money that is provided without charge or at less than its commercial value.”

In the *Guideline on Gifts (including Invitations, Fundraisers and Business Lunches)* that you issued in 2008, you stated that your enforcement policy concerning section 11 of the *Act* is that federal Cabinet ministers and other senior government officials (and their family members) cannot accept any gifts or favours from anyone who is trying to influence, or will be trying to influence, or has or will have dealings with, the minister or government official, even if the lobbyist is a friend or a relative.

Specifically, you stated the following in the *Guideline*:

- “The purpose of prohibiting public office holders or their family members from receiving gifts is to preserve confidence in the integrity of public decision-making. The determining factor is whether the gift might reasonably be seen to have been given to influence the public office holder's decision-making.” (pp. 4-5)
- “It is important to consider who is offering the gift and why it is being offered. The donor's existing, or future relationship to the public office holder is of particular relevance.” (p. 5);
- “A public office holder or family member should consider why a gift is being offered. If a gift is being offered by someone whose interests could be affected by a decision the public office holder may be called upon to make, then the *Act* will likely apply and prohibit its acceptance.” (p. 5);
- “If a friend is offering a gift in a context not normally associated with gift-giving and the friend is also doing or likely to do business directly or indirectly with the public service entity of the public office holder, then the gift should not be accepted.” (p. 7), and;
- “The Office considers a normal expression of “courtesy or protocol” to be a token expression of appreciation in the context of some official interaction.” (p. 7)

On page 5 of the *Guideline*, you list five situations in which a gift likely is prohibited, including: “The donor or the donor's firm is a registered lobbyist or has hired a registered lobbyist to lobby the public office holder or the public sector entity of the public office holder.”

Strangely, your *Guideline on Gifts* is essentially silent on the issue of the exemption for gifts or

other advantages that are permitted under the *Canada Elections Act*. All your *Guideline* says about this exemption is that:

“Gifts that are permitted under the Canada Elections Act are acceptable under the Conflict of Interest Act. The Canada Elections Act applies to electoral candidates during an election period. Click here to link to the Canada Elections Act.”

The *Canada Elections Act* defines “contribution” as “2.(1) a monetary contribution or a non-monetary contribution” and, therefore, contributions include money, property and services, with “monetary contribution” defined as “an amount of money provided that is not repayable” and “non-monetary contribution defined as “the commercial value of a service, other than volunteer labour, or of property or of the use of property or money to the extent that they are provided without charge or at less than their commercial value.”

The *Canada Elections Act* defines “commercial value” as follows:

“2.(1) “commercial value”, in relation to property or a service, means the lowest amount charged at the time that it was provided for the same kind and quantity of property or service or for the same usage of property or money, by

- (a) the person who provided it, if the person is in the business of providing that property or service; or
- (b) another person who provides that property or service on a commercial basis in the area where it was provided, if the person who provided the property or service is not in that business.”

Only individuals are permitted to make contributions under the *Canada Elections Act* and the limits on contributions are as follows:

“Contribution limits

405. (1) No individual shall make contributions that exceed

- (a) \$1,000 in total in any calendar year to a particular registered party;
- (a.1) \$1,000 in total in any calendar year to the registered associations, nomination contestants and candidates of a particular registered party;
- (b) \$1,000 in total to a candidate for a particular election who is not the candidate of a registered party; and
- (c) \$1,000 in total to the leadership contestants in a particular leadership contest.”

With regard to clause 405(1)(a.1) set out above, total contribution limit applies to the combined total contributions made to a registered associations, nomination contestants and candidates of a given registered party during a calendar year and, with regard to clause 405(1)(c), to the combined total contributions made to the leadership contestants in a specific leadership race.

Under section 405.1 of the *Canada Elections Act*, these limits are adjusted for inflation annually. As a result, the actual limit on each type of contribution of money, property or services listed above during 2009 is \$1,100.

However, as set out above, “volunteer labour” is not included in the definition of “non-monetary contribution.” Subsection 2(1) of the *Canada Elections Act* defines “volunteer labour” as: “any service provided free of charge by a person outside their working hours, but does not include such a service provided by a person who is self-employed if the service is one that is normally charged for by that person.”

Therefore, Democracy Watch’s opinion is that the only gifts that are permitted under the *Canada Elections Act* exemption in clause 11(2)(a) of the *Conflict of Interest Act* are money, property or the use of property or services provided by an individual up to the contribution limit of \$1,100 (or equivalent commercial value) annually, and volunteer labour provided by an individual outside of their area of work and outside of their working hours.

(b) *Conflict of Interest Code for Members of the House of Commons (MPs Code)* purposes and “gifts” measures

With regard to the *Conflict of Interest Code for Members of the House of Commons* (the *MPs Code*), which you also enforce, among the purposes are the following, to:

- “1.(a) maintain and enhance public confidence and trust in the integrity of Members as well as the respect and confidence that society places in the House of Commons as an institution;
- (b) demonstrate to the public that Members are held to standards that place the public interest ahead of their private interests and to provide a transparent system by which the public may judge this to be the case; . . .”

And, in section 2, Principles are set out that, under section 3.1 you “may have regard to” when “interpreting and applying Members’ obligations under” the *MPs Code*. Among the Principles are the following, that MPs are expected:

- “2. (b) to fulfill their public duties with honesty and uphold the highest standards so as to avoid real or apparent conflicts of interests, and maintain and enhance public confidence and trust in the integrity of each Member and in the House of Commons;
- (c) to perform their official duties and functions and arrange their private affairs in a manner that bears the closest public scrutiny, an obligation that may not be fully discharged by simply acting within the law;
- (d) to arrange their private affairs so that foreseeable real or apparent conflicts of interest may be prevented from arising, but if such a conflict does arise, to resolve it in a way that protects the public interest; . . .”

Concerning gifts and benefits, subsection 14(1) of the *MPs Code* states that:

“14.(1) Neither a Member nor any member of a Member’s family shall accept, directly or indirectly, any gift or other benefit, except compensation authorized by law, that might reasonably be seen to have been given to influence the Member in the exercise of a duty or function of his or her office.”

And while there are definitions of “gift” and “benefits” in the *MPs Code* that are not relevant to the matter addressed in this petition, in June 2009 MPs voted to change the *MPs Code* to define “benefit” as:

- (a) an amount of money if there is no obligation to repay it; and
 - (b) a service or property, or the use of property or money that is provided without charge or at less than its commercial value, other than a service provided by a volunteer working on behalf of a Member;
- but does not include a benefit received from a riding association or a political party.”

However, during your testimony to the Oliphant Commission of Inquiry on June 17, 2009, you stated that, despite this definition, you would consider a gift from a lobbyist of volunteer services to an MP as a prohibited gift/benefit under the *MPs Code* (page 5504 of the Commission’s official transcript).

Therefore, Democracy Watch’s opinion is that it is a violation of the *MPs Code* for an MP to accept any gift of money, property or the use of property or services (volunteer or otherwise, such as fundraising) from a registered lobbyist, as such a gift can reasonably be seen to be given to influence the MP’s exercise of their public duties.

Application of the law to the Conservatives' fundraising event at Rogers Centre

(a) Concerning the gift-acceptance provisions in the *Conflict of Interest Act*

If Rogers provided the gift of the use of the Owner's Box at the Rogers Centre for the fundraising event and/or the gift of services in organizing the event and/or the perks involving the Blue Jays players, tickets, food and beverages, it seems clear in Democracy Watch's opinion that any Cabinet ministers and MPs who attended the event would have accepted a gift that is prohibited by the *Conflict of Interest Act* and the *MPs Code* because none of the gift rules' exemptions apply and the gift would have been given by a company registered to lobby the federal Cabinet and the House of Commons and the gift has significant value and, therefore, should be regarded as a gift that can reasonably be seen to have been given to influence the Cabinet ministers and MPs.

Even if the Conservatives paid Rogers for the services provided by Rogers for the event (including food and beverages), the Owner's Box cannot be rented, and therefore payment cannot be effectively made at a commercial rate for the use of the Owner's Box because lack of access to the Box makes its rental cost inestimably high. Therefore, it seems clear, in Democracy Watch's opinion, that the use of the Owner's Box reasonably should be considered to be a very valuable, and prohibited, gift to any Cabinet minister or MP who attended the event.

Democracy Watch does not know if attending and meeting Blue Jays players at batting practice is also something that the public has access to for a specific price, or if it is a perk that can only be accessed with the permission of the owners of the Blue Jays, namely Rogers. The invitation to the event indicates that this perk is not something that attendees were paying for when they made a donation to Mr. Dykstra's riding association to attend the event. If it is such an exclusive perk, it seems clear, in Democracy Watch's opinion, that this perk reasonably should also be considered to be a very valuable, and prohibited, gift to any Cabinet minister or MP who attended the event.

(b) Concerning the conflict of interest and recusal provisions in the *Conflict of Interest Act* (the *Act*) and the *MPs Code* and court rulings that inform their interpretation

With regard to conflicts of interest, the *Act* states that:

"6.(1) No public office holder shall make a decision or participate in making a decision related to the exercise of an official power, duty or function if the public office holder knows or reasonably should know that, in the making of the decision, he or she would be in a conflict of interest."

The *Act* defines key terms in the above cited sections as follows:

"Conflict of interest

4. For the purposes of this *Act*, a public office holder is in a conflict of interest when he or she exercises an official power, duty or function that provides an opportunity to further his or her private interests or those of his or her relatives or friends or to improperly further another person's private interests."

and

"2.(1) "private interest" does not include an interest in a decision or matter

(a) that is of general application;

(b) that affects a public office holder as one of a broad class of persons; or

(c) that concerns the remuneration or benefits received by virtue of being a public office holder."

With regard to recusal of a public office holder from a decision-making process, the *Act* states:

"Duty to recuse

21. A public office holder shall recuse himself or herself from any discussion, decision, debate or vote on any matter in respect of which he or she would be in a conflict of interest."

The *Act* also states that:

“Anti-avoidance

18. No public office holder shall take any action that has as its purpose the circumvention of the public office holder’s obligations under this *Act*.”

“Condition of appointment or employment

19. Compliance with this *Act* is a condition of a person’s appointment or employment as a public office holder.”

In contrast, the *MPs Code* does not contain a definition of “conflict of interest” but states that:

“8. When performing parliamentary duties and functions, a Member shall not act in any way to further his or her private interests or those of a member of the Member’s family, or to improperly further another person’s or entity’s private interests.”

and the *MPs Code* defines “furthering a private interest” as, among several other ways:

“3.(2) Subject to subsection (3), a Member is considered to further a person’s private interests, including his or her own private interests, when the Member’s actions result, directly or indirectly, in any of the following
(c) the acquisition of a financial interest by the person;

Not furthering private interests.

(3) For the purpose of this Code, a Member is not considered to further his or her own private interests or the interests of another person if the matter in question
(a) is of general application;
(b) affects the Member or the other person as one of a broad class of the public;
(b.1) consists of being a party to a legal action relating to actions of the Member as a Member of Parliament; or
(c) concerns the remuneration or benefits of the Member as provided under an Act of Parliament.”

Finally, the *MPs Code* states that:

“13. A Member shall not participate in debate on or vote on a question in which he or she has a private interest.”

In *R. v. Hinchey*, [1996] 3 S.C.R. 1128, Supreme Court of Canada Justice L’Heureux-Dube wrote the majority judgment including that:
At paragraph 17:

“For a government, actual integrity is achieved when its employees remain free of any type of corruption. On the other hand, it is not necessary for a corrupt practice to take place in order for the appearance of integrity to be harmed. Protecting these appearances is more than a trivial concern.”

And at paragraph 18:

“In my view, given the heavy trust and responsibility taken on by the holding of a public office or employ, it is appropriate that government officials are correspondingly held to codes of conduct which, for an ordinary person, would be quite severe.”

The minority judgment in *R v. Hinchey*, delivered by Justice Peter Cory, did not dissent on any of the above points. In fact, Justice Cory agreed with the need for an “appearance of integrity” standard for public officials, stating at paragraph 94:

“The magnitude and importance of government business requires not only the complete integrity of government employees and officers conducting government business but also that this integrity and trustworthiness be readily apparent to society as a whole.”

The July 9, 2004 ruling by Honourable Justice Frederick E. Gibson in *Democracy Watch v. The Attorney General of Canada (Office of the Ethics Counsellor)* [2004 FC 969] and [2004] 4 F.C.R. 83 echoed the Supreme Court of Canada's ruling in *R v. Hinchey*.

In addition, in *Democracy Watch v. Campbell* (2009 FCA 79), the Federal Court of Appeal (FCA) considered a situation of a lobbyist who had organized a fundraising event for a Cabinet minister the lobbyist was registered to lobby at the time of the event.

The FCA quoted passages from three previous leading court rulings on the issue of conflict of interest in paragraph 49 and then stated at paragraph 52:

"Since a public office holder has, by definition, a public duty, one can only place a public office holder in a conflict of interest by creating a competing private interest."

and at paragraph 53 that:

"A lobbyist's stock in trade is his or her ability to gain access to decision makers, so as to attempt to influence them directly by persuasion and facts. Where the lobbyist's effectiveness depends upon the decision maker's personal sense of obligation to the lobbyist, or on some other private interest created or facilitated by the lobbyist, the line between legitimate lobbying and illegitimate lobbying has been crossed."

and at paragraph 48 that:

"It can hardly advance public confidence in the integrity and transparency of government decision-making to condone certain conflicts of interest, while prohibiting others. Any conflict of interest impairs public confidence in government decision-making."

Taking into account the above measures in the *Act* and the *MPs Code*, and the court rulings, concerning the private interest created by the situation of the Conservatives' holding a fundraising event in the Owner's Box at the Rogers Centre (with the added perks of attending and meeting members of the Blue Jays team at batting practice), Democracy Watch's opinion is that the Conservative Cabinet ministers and any other public office holders and MPs who attended the event all have created a specific, personal private interest for themselves by accepting these gifts from Rogers (which causes them to have a "personal sense of obligation" to Rogers).

It is also Democracy Watch's opinion that the ministers and others and MPs also have a specific, personal private interest in having Rogers continue to help raise money for them, and that both these private interests are clearly financial interests which fall under the definition of "private interest" in the *Act* and the *MPs Code*.

To be clear, the "private interest" created is not Rogers' interest in a beneficial result from the decisions and actions of the Cabinet ministers and others and MPs (although Rogers obviously also has this private interest constantly), the private interest is the personal sense of obligation the ministers and others and MPs have to Rogers because of the gifts given to them by Rogers, and the interest of the Cabinet ministers and others and MPs in having Rogers continue to assist them with their fundraising efforts.

As a result, the exemptions in the definition of "private interest" in the *Act* do not apply, as the private interest of the Conservative Cabinet ministers and others and MPs is not a matter of general application or that affects them as one of a broad class of persons (because it applies specifically and directly only to them, not others), and is not part of the pay or benefits they receive as a federal politician.

Therefore, in Democracy Watch's opinion, such a situation creates a conflict of interest under the *Conflict of Interest Act* and the *MPs Code* respectively for any Cabinet ministers, their staff or MPs who attended the event, and because of this conflict of interest it is reasonably to conclude that they should recuse themselves from participating in decisions that affect Rogers directly or indirectly -- any kind of decisions -- because they have a personal, private interest in making decisions that will benefit Rogers, and this interest conflicts with their public duty to make decisions in the public interest based only on the merits.

Request for investigation and rulings on situation, a recusal ruling

Under the *Conflict of Interest Act* (the *Act*) you as Commissioner have the power to initiate an examination of a matter if you have reason to believe that a public office holder has contravened the *Act*.

“Examination on own initiative

45. (1) If the Commissioner has reason to believe that a public office holder or former public office holder has contravened this *Act*, the Commissioner may examine the matter on his or her own initiative.”

Democracy Watch believes that the information set out above gives you much more than adequate evidence upon which to form the reasonable belief that a contravention has occurred.

And beyond finding those people covered by the *Act* in violation of the *Act*, you also have under the *Act* the power to make orders as follows:

“Compliance order

30. In addition to the specific compliance measures provided for in this Part, the Commissioner may order a public office holder, in respect of any matter, to take any compliance measure, including divestment or recusal, that the Commissioner determines is necessary to comply with this *Act*.”

Again, based on the information set out above about the situation of the Conservatives’ fundraising event at the Rogers Centre, and the law (which the *Conflict of Interest Act*, the *Canada Elections Act*, your *Guideline on Gifts*, the *MPs Code* and the courts define quite clearly), Democracy Watch’s opinion is that the Cabinet ministers and MPs who attended the event accepted a gift in violation of the *Conflict of Interest Act* and the *MPs Code* because the gift can reasonably be seen to have been given to influence the exercise of their official duties, and Democracy Watch’s opinion is that it is reasonable to conclude that they are therefore in a conflict of interest, and will be in a situation in which they will have an opportunity to make decisions that will affect their private interest in having Rogers continue to assist with their fundraising efforts.

As a result, Democracy Watch’s opinion is that it is reasonable for you to believe that that public office holders have contravened the *Conflict of Interest Act*, and that MPs have contravened the *MPs Code*, and therefore it is reasonable, if you are going to act in a legally correct manner, for you to examine the matter addressed in this petition, and issue a ruling that finds Cabinet ministers and MPs in contravention of the *Act* and *MPs Code*, and issue recusal orders to those ministers and MPs.

Democracy Watch looks forward to your prompt response to the above information and requests.

Sincerely,



Duff Conacher, Coordinator
on behalf of the Board of Directors of Democracy Watch

Original to follow by mail

ATTACHMENT:

Copy of 1-page email invitation to the Blue Jays Fundraiser September 6

----- Original Message -----

From: DykstR9@parl.gc.ca <DykstR9@parl.gc.ca>

To: DykstR9@parl.gc.ca <DykstR9@parl.gc.ca>

Sent:

Subject: Fw: Blue Jays Fundraiser September 6

On Sunday September 6th I have the opportunity to host 60 friends in the Owner's Box at the Roger's Centre. The Toronto Blue Jays will be playing host to the New York Yankees.

The game begins at 1:30pm and includes the opportunity to attend batting practice, meet with the President of Blue Jay Operations, ministers from the federal government and players from the Blue Jays.

Included with your contribution to my federal association is a ticket to the game, access to the owner's suite, beverages and food during the entire game.

I look forward to seeing you at the game and having the opportunity to see you on September 6th. Your assistance and attendance is deeply appreciated. Fundraising is a key aspect to the success we have achieved in the last two elections and your commitment means a great deal.

Regards and looking forward to seeing you.

Rick Dykstra
Member of Parliament
St. Catharines

----- Original Message -----

From: Dykstra, Rick - Personal

To: Dykstra, Rick - Personal

Sent: Tue Jul 21 16:35:18 2009

Subject: Blue Jays Fundraiser September 6

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Blue Jays Fundraiser September 6.doc (108.5KB)

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