



M. Birrell #1
Sworn: September 12, 2008

No. S085226
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

BRITISH COLUMBIA TEACHERS' FEDERATION,
HOSPITAL EMPLOYEES' UNION,
BRITISH COLUMBIA GOVERNMENT AND SERVICE EMPLOYEES' UNION,
FEDERATION OF POST-SECONDARY EDUCATORS OF BRITISH COLUMBIA,
BRITISH COLUMBIA DIVISION OF THE CANADIAN UNION OF PUBLIC EMPLOYEES,
CANADIAN OFFICE & PROFESSIONAL EMPLOYEES UNION, LOCAL 378,
BRITISH COLUMBIA NURSES' UNION
and MARCIA TOMS

PLAINTIFFS

AND:

HER MAJESTY THE QUEEN IN RIGHT OF THE PROVINCE OF BRITISH COLUMBIA

DEFENDANT

AFFIDAVIT

I, MARGARET BIRRELL, political activist, of #204-456 West Broadway, in the City of Vancouver, Province of British Columbia, MAKE OATH AND SAY AS FOLLOWS:

1. I have been the Executive Director of the BC Coalition of People with Disabilities ("BCCPD") since 1986 and as such have personal knowledge of the facts and matters to which I have hereinafter deposed.

2. In July of 1996, BC Finance Minister, Andrew Petter, indicated that the government was considering introducing no-fault auto insurance as a cost saving measure, and intended to conduct a consultative process with a view to making a final decision by the end of the year.

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1. I have been the Executive Director of the BC Coalition of People with Disabilities ("BCCPD") since 1986 and as such have personal knowledge of the facts and matters to which I have hereinafter deposed.

2. In July of 1996, BC Finance Minister, Andrew Petter, indicated that the government was considering introducing no-fault auto insurance as a cost saving measure, and intended to conduct a consultative process with a view to making a final decision by the end of the year.

3. The evidence available to me at that time made it clear to me that no-fault insurance does not lead to cost savings, but rather leads to increased accidents and fatalities because it encourages irresponsibility. It is also unfair in that it treats dangerous and drunk drivers in the same way as their victims. Finally, it prevents the vulnerable victims of accidents from obtaining adequate compensation for their predicament from the courts. I had a responsibility to those represented by BCCPD to speak out against the adoption of any such scheme, thereby protecting this vulnerable group from the actions of the government whom the people had invested with sovereign power.

4. By mid-October of 1996, the Coalition Against No-Fault ("CANF") had formed. CANF had seven founding members: Mothers Against Drunk Driving (Cdn. Soc.), the Surrey Community Crime Prevention Society, the BCCPD, the Trial Lawyers Association, the Injured Workers Human Rights Group, the BC Brain Injuries Association, and the Surrey Chapter of the Business and Professional Women's Club of BC and the Yukon. I became, and still am, a member of the steering committee of CANF.

5. The immediate goal of CANF was to ensure that the legislature did not enact legislation introducing no-fault insurance.

6. I had been a candidate for the NDP in the 1996 election, a NDP leadership candidate in 1984, and a member of the executive committee of the NDP in or about 1994 through 1996, for a two year period. As such, I was in a privileged position with respect to my ability to put forth my views to the elected representatives forming the government at that time. I and other members of the CANF met in private with the Premier, the Attorney General, and many MLAs. It was clear that they were committed to introducing no-fault insurance despite the arguments we presented.

7. CANF decided that, despite our insider status, the only way we could effectively voice our concerns to the government was to unite people to present our message with one voice. We mounted a campaign with this objective. The BCCPD agreed to pay my salary for six months while I worked on the campaign.

8. The polling conducted by CANF showed that the public was largely uninformed about and unconcerned by no-fault insurance. Our first and main tasks were to focus the attention of the public on this issue and to educate them as to the negative effects of such a scheme. To this end, we issued press releases, appeared on radio and TV talk shows, organized rallies and purchased advertising.

9. CANF sponsored one TV advertisement, and a number of radio advertisements. However, our main vehicle was print advertising. We preferred print advertising because it was less expensive than television or radio but also because we believed that we had a fairly long campaign to wage and did not need the more immediate impact that TV or radio might have. The ads that we purchased were large in format and would typically encompass the majority of a newspaper page. Attached hereto and marked as **Exhibit "A"** to this my Affidavit is a true copy of an advertisement which we purchased and which appeared in a major newspaper in November of 1996, titled "IMAGINE YOURSELF IN THIS ACCIDENT". Attached hereto and marked as **Exhibit "B"** to this my Affidavit is a true copy of a second advertisement which we purchased and which appeared in the Vancouver Sun, the Province, and the Victoria Times Colonist in November of 1997, titled "AND JUSTICE FOR NONE".

10. Many of these advertisements contained pictures of accident victims and lists of groups who had endorsed our campaign. Crucial to our approach was that these advertisements appear before the public repeatedly. The shock value of the pictures would be most effective if the public were exposed to them over and over. The growing list of community groups joining CANF for this campaign would lead others to join, giving the campaign momentum.

11. Although this advertising was only part of our campaign, the various pieces reinforced each other and the growing list of endorsers which the advertisements contained gave our campaign visibility and credibility which was crucial to its success. Attached hereto and marked as **Exhibit "C"** to this my Affidavit is a true copy of an advertisement announcing a rally on February 20, 1997 which we placed in a major newspaper, titled "NO TO NO-FAULT", and which contains a list of supporting organizations.

12. Eventually the list of community groups which had joined CANF for this campaign had 207 members. Attached hereto and marked as **Exhibit "D"** to this my Affidavit is a list of these groups. Although it is impossible to determine exactly how many citizens were members of these groups, they certainly number in the tens of thousands and perhaps even in the hundreds of thousands. Over fourteen percent of the BC population has disabilities, and the BCCPD on its own is an umbrella group representing over 1,500 organizations.

13. Our advertising specifically targeted the Premier. Attached hereto and marked as **Exhibit "E"** to this my Affidavit is a true copy of an advertisement placed by CANF in the Vancouver Sun on March 15, 1997 and in the Province on March 16, 1997 centered around the following statement which appears in large bold font: "PLEASE MR. PREMIER... DON'T TAKE AWAY OUR RIGHTS". Attached hereto and marked as **Exhibit "F"** to this my Affidavit is a true copy of an advertisement, which we placed in a major newspaper, with the headline "PLEASE KEEP YOUR PROMISE MR. PREMIER". Both advertisements contain photos of the then serving Premier.

14. The campaign finally ended in June 1997, when the Premier's office decided not to introduce no-fault insurance.

15. Before announcing this decision, the Premier's office contacted me and I agreed that CANF would run advertisements thanking him for making that decision, which CANF did. Attached hereto and marked as **Exhibit "G"** to this my Affidavit is a true copy of an advertisement thanking the Premier for listening and not introducing no-fault insurance, which we placed in the Province and the Vancouver Sun on June 25, 1997, titled "Thank You Premier Clark for listening!".

16. The total value of the print advertising purchased by CANF during this campaign exceeded \$250,000 (in 1997 dollars), with each advertisement costing between approximately \$3,000 and \$10,000 to run. Limits on the amounts we could spend in any particular two month period could easily have derailed the campaign by killing its momentum. This is particularly true for the period from February 26 to April 26, 1997, as the Allen Committee which recommended the adoption of no-fault insurance to the government made its report available on

March 14, 1997. If we had not been able to effectively respond to this report, its conclusions might well have been adopted. Attached hereto and marked as **Exhibit "H"** to this my Affidavit is a true copy of an advertisement which we purchased which appeared in the Province on February 26, 1997, titled "WHAT IS ICBC'S REAL AGENDA? -- NO-FAULT!". As noted above, Exhibit "E" is a true copy of an advertisement which we placed in both the Sun and the Province in March of 1997. Attached hereto and marked as **Exhibit "I"** to this my Affidavit is a true copy of an advertisement which we placed in the Province on March 23, 1997 and in the Vancouver Sun on March 22 and April 1, 1997, headed "In a matter of weeks, the BC Government and ICBC will introduce NO-FAULT Legislation". Attached hereto and marked as **Exhibit "J"** to this my Affidavit is a true copy of an advertisement which we purchased which appeared in the Province on April 13, 1997, headed "Imagine ICBC having total control over your life". Attached hereto and marked as **Exhibit "K"** to this my Affidavit is a true copy of an advertisement announcing a town hall meeting on May 1, 1997 which we placed in a major newspaper in April of 1997, titled "In a matter of weeks, the BC Government and ICBC plan to introduce No-Fault Legislation". The advertisement of which Exhibit "F" is a true copy may well have been placed during this period as may other advertisements of which I have no record.

17. At any given time, the BCCPD advocates about a number of issues with a number of partners. These issues all concern the support provided to people with disabilities in British Columbia. The BC Liberal Platform – "A Proven Plan For A Golden Decade" – lists five goals. Attached hereto and marked as **Exhibit "L"** to this my Affidavit is an extract from the BC Liberal Party Platform listing these goals. The third goal stated is "Build the best system of support in Canada for persons with disabilities, special needs, children at risk and seniors." Thus, all of the BCCPD advocacy is about an issue associated with the Liberal Party.

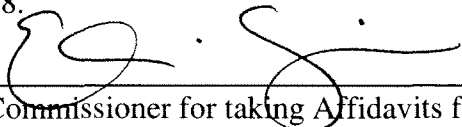
18. Campaigns currently listed on the BCCPD webpage concern the following issues:

- a. the provision of an effective door-to-door transit service in Metro Vancouver by HandyDART;
- b. increasing the minimum wage in British Columbia to \$10 per hour;

- c. compensation for the victims of abuse at Woodlands school, a provincial institution that provided residential care for thousands of children who were deemed to have mental disorders;
- d. the provision of equipment and assistive devices to British Columbians with disabilities;
- e. how disability benefits are failing British Columbians;
- f. suggested changes to provisions of the British Columbia *Insurance (Vehicle) Act*, RSBC 1996, c. 231 concerning the provision of benefits to accident victims and their families;
- g. the suggested introduction of a wrongful death act in BC;
- h. the British Columbia government's proposals to reduce the time limits within which a civil action must be started; and
- i. compensation for those infected with Hepatitis C through tainted blood transfusions.

Attached hereto and marked as **Exhibit "M"** to this my Affidavit is a screenshot of the community campaigns webpage of the BCCPD website found at: www.bccpd.bc.ca/campaigns/default.htm.

19. The government sometimes enacts legislation to which the BCCPD is opposed in an omnibus bill, with little or no previous consultation with the public. In the spring of 2007, the government introduced restrictions on the liability of car rental and leasing companies with respect to damage caused by the cars they owned. This was buried in *Bill 35* which became the *Miscellaneous Statutes Amendment Act(No. 2)*, 2007 S.B.C. 2007 c. 24. This bill was given first reading on April 26, 2007 and granted Royal Assent on May 31, 2007. In such a context, an advocacy campaign aimed at preventing the adoption of such legislation would have to have an effect in a very short time period.

SWORN BEFORE ME at the City of)
Vancouver, in the Province of British)
Columbia, this 12th day of September,)
2008.)
)
A Commissioner for taking Affidavits for)
British Columbia.)


MARGARET BIRRELL

Elin R. S. Sigurdson
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Barristers
1350 - 355 Burrard Street
Vancouver, BC V6C 2G8
Phone 604.689.4421
Fax 604.687.1941

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EDUCATORS OF BRITISH COLUMBIA, BRITISH COLUMBIA DIVISION
OF THE CANADIAN UNION OF PUBLIC EMPLOYEES, CANADIAN
OFFICE & PROFESSIONAL EMPLOYEES UNION, LOCAL 378, BRITISH
COLUMBIA NURSES' UNION and MARCIA TOMS

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AFFIDAVIT

Arvay Finlay
Barristers
1350 – 355 Burrard Street
Vancouver BC V6C 2G8
Phone: 604.689.4421
Fax: 604.687.1941
File No. 2638-001

1

Advertisement placed in a major newspaper in November of 1996, titled "IMAGINE YOURSELF IN THIS ACCIDENT"

This is Exhibit A referred to in the
Affidavit of Margaret Birrell
Sworn before me at the City of Vancouver, BC
this 12th day of September, 2008.



A Commissioner for taking Affidavits for
British Columbia



IMAGINE YOURSELF IN THIS ACCIDENT

YOUR NEXT PROBLEM IS NO-FAULT INSURANCE.

The facts speak for themselves. ICBC wants to radically change our auto insurance system. They want to move to a system which gives them the power to decide your future. They want to move to

a system which compensates victims based on recent income. And they want to move to a system that punishes innocent victims, while rewarding reckless and drunk drivers.

Q: ICBC says that a no-fault system will keep our premiums down. Wouldn't that be good news for British Columbians?

A: Yes, if it were true. The reality is that ICBC knows full well that in the last two years of no-fault in Ontario, premiums have increased 21%. The same trend is true in other jurisdictions. Big insurance companies always promise savings but seldom deliver. As well, data shows that accidents and fatalities go up under no-fault.

Q: Would no-fault be unfair to women?

A: Yes, for two reasons. Men cause twice as many accidents as women, and 80% of accidents where drinking or speeding is involved, no-fault will let ICBC treat dangerous drivers the same as victims. And, as women earn less money on average than men, they'll receive smaller settlements.

Q: Wouldn't no-fault be bad news for people who are on fixed incomes such as seniors?

A: Yes. But seniors wouldn't be the only ones treated unfairly. Economically disadvantaged groups would also feel the pain. As we have already seen, no-fault would be bad news for women and small business operators as well as for laid off or seasonal workers.

What should I do to help stop No-Fault?

**CALL TOLL FREE
1-888-224-8811**

FOR MORE INFORMATION

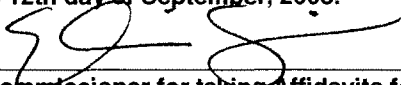
**Join the Coalition Against
No-Fault In British Columbia.**

NO-FAULT = NO SENSE

Some of the groups concerned with this issue are Mothers Against Drinking Drivers (Canadian Society), BC Brain Injury Association, Injured Workers' Human Rights Group, Surrey Chamber of Commerce, Business and Professional Women's Club of BC and Yukon (Surrey Club), BC Coalition of People with Disabilities, Trial Lawyers Association of BC, Kamloops Brain Injury Association, ME Association of BC, Kamloops Reporting Services, Nanaimo Head Injury Society, Surrey Community Crime Prevention Society, United Fishermen and Allied Worker's Union

Advertisement placed in the Vancouver Sun, the Province, and the Victoria Times Colonist in November of 1997, titled “AND JUSTICE FOR NONE”

This is Exhibit B referred to in the
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AND JUSTICE FOR NONE.

The facts speak for themselves. ICBC wants to change our auto insurance system. It wants to move to a system which gives it power to decide your future. ICBC wants to be your adjuster, doctor, physiotherapist, chiropractor, lawyer, judge and jury. It wants total control.

Q: Will auto insurance rates go down?

A. No. That is a myth created by the insurance companies. Where states in the US adopted no-fault insurance, rates soared an average of 40%. Skyrocketing more than 50% in Hawaii. In Ontario's last two years with no-fault, premiums increased by over 21%. Manitoba motorists faced a first year increase of 6.2% in premiums. Because the number of accidents increases and reckless, at-fault drivers get full benefits. So, good drivers end up paying for bad drivers.

**With No-Fault, Good Drivers
End Up Paying For Bad Drivers.**

Q: How are my legal rights affected?

A: No-fault denies your rights to have a court decide your compensation, if ICBC is not fair. The adjuster is in complete control of your situation and will decide which doctor, what treatment and how you are compensated. No-fault auto insurance can be compared to the WCB.

**CALL TOLL FREE
1-888-224-8811
FOR MORE INFORMATION**

NO-FAULT = NO SENSE

Q: As an innocent accident victim, shouldn't I be fully compensated?

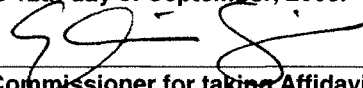
A: Under no-fault, there is no such thing as an innocent accident victim, nor is there a guilty, at-fault driver. The reckless driver can receive more compensation than you, the innocent victim. No-fault subsidizes the reckless driver at your expense! Compensation is based on a pre-set list or "Meat Chart" There is simply no sensitivity to your personal problems.

**Join the Coalition Against
No-Fault In British Columbia.**

Some of the groups concerned with this issue are Mothers Against Drinking Drivers (Canadian Society), BC Brain Injury Association, Injured Workers' Human Rights Group, Surrey Chamber of Commerce, Business and Professional Women's Club of BC and Yukon (Surrey Club), BC Coalition of People with Disabilities, Trial Lawyers Association of BC, Kamloops Brain Injury Association, ME Association of BC, Kamloops Reporting Services, Nanaimo Head Injury Society, Surrey Community Crime Prevention Society, Northwest Real Estate Board, Vancouver Island Real Estate Board, Kamloops & District Real Estate Association, Nanaimo Women's Business Network, R.O.R.Y. (Kelowna Injured Workers Group), Canadian Taxpayers Federation, Kelowna Chamber of Commerce.

Advertisement placed in a major newspaper in April 1997
titled "NO TO NO-FAULT"

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A Commissioner for taking Affidavits for
British Columbia

NO TO NO-FAULT

The Coalition Against No-Fault is sponsoring a public rally to send the provincial government a resounding "No" to No-Fault Insurance.

Injury insurance, Thresholds, Motorist Protection Plan, or deductibles are all **no-fault** and no good.

If you believe as we do that this bureaucratic system would deprive you of your basic rights and make good drivers pay for bad drivers, join us at the rally.
It's your chance to give Victoria a unified message: **"No" to No-Fault.**

On hand will be speakers who know a lot about the subject and volunteers who'd be happy to sign you up as a Coalition member.

No-Fault is no way to solve our auto insurance problems.
Stand up and be counted.



RALLY

THURSDAY 20 FEBRUARY AT 4:30 P.M.
800 GEORGIA STREET PLAZA (BETWEEN HORNBY & HOWE)
VANCOUVER, BC, THE OLD COURT HOUSE

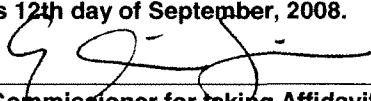


Call Toll Free For More Information 1-888-224-8811

Some of the groups concerned with this issue are: BC Brain Injury Association, BC Coalition of People with Disabilities, Business & Professional Women's Club of BC and Yukon (Surrey Club), Canadian Injured Workers Society, Canadian Taxpayers Federation, Central Okanagan Brain Injury Association, Greater Victoria Chamber of Commerce, Injured Workers' Human Rights Group, Kamloops Brain Injury Association, Kamloops and District Real Estate Association, Kamloops Reporting Services, Kelowna Chamber of Commerce, M.E. Association of BC, Mothers Against Drunk Drivers (Canadian Society), Nanaimo Women's Business Network, Nanaimo Head Injury Society, Northwest Real Estate Board, Prince George Business & Professional Women's Club, Resource Centre for Independent Living, Rid Road Impaired Drivers, R.O.R.Y. (Kelowna Injured Workers Group), Surrey Chamber of Commerce, Surrey Crime Prevention Society, Trial Lawyers Association of British Columbia, Vancouver Island Real Estate Board, BC Citizens Against No-Fault Insurance, BC Widow's Association, Central Interior Logging Association, Central Island Legal Support Staff Association, Coquitlam, Port Coquitlam and Port Moody Chamber of Commerce, Kinsman Rehabilitation Foundation of BC, Students Association of UBC, Nanaimo Widow's Support Group, New Westminster Council of Women, North Shore Women's Centre, White Rock & District Council of Women, Advocacy Outreach Society, Arthritis Society - Kelowna Association for Community Living, BC Blind Sports & Recreation Association, BC Nurses' Union, BC Persons with Disabilities Society, BC Sports & Fitness Council for the Disabled, BCEADS, Burnaby Association for the Mentally Handicapped, Burnaby Mental Wealth Society, Canadian Amputee Sports Association, Canadian Hard of Hearing Assn - BC Chapter, Canadian Nat'l Institute for the Blind, Cerebral Palsy Association of BC, City of Coquitlam - Mayor's Committee on People with Disabilities, Committee to Promote Accessible Conventional Transit, Cowichan Valley ILRC Society, Craftworks Society, Disabled Women's Network - Canada, Family Support Institute, Fanny Bay OAPO, First National Council of Women, Fort Nelson Women's Resource Centre, Kelowna Women's Resource Centre, New View Society, North Shore Disability Resource Centre, Pacific Transit Cooperative, Plexus Consulting, Quesnel Women's Resource Centre, Terrace Women's Centre, Vancouver Resource Society, Voice of the Cerebral Palsied of Greater Van., West Kootenay Cerebral Palsy Association, Women's Resource Centre - Cowichan Valley.

List of Members of CANF, 1997

**This is Exhibit D referred to in the
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Sworn before me at the City of Vancouver, BC
this 12th day of September, 2008.**



**A Commissioner for taking Affidavits for
British Columbia**



A.V. Arthritis Support Society
Action Committee of People with Disabilities
Active Retirees of Steelworkers of America - Vancouver
Adult Learning Disabilities Association (ALDA)
Advocacy Outreach Society
Alberni Valley Head Injury Society
Alzheimer Society of BC
ANKORS
Arbutus Vocational Society
Arthritis Society - Kelowna
Battered Women's Support Services
BC Association for Community Living
BC Blind Sports & Recreation Association
BC Brain Injury Association
BC Chamber of Commerce
BC Chiropractic Association
BC Citizens Against No-Fault Insurance
BC Coalition of People with Disabilities
BC Nurses' Union
BC Old Age Pensioners Organization
BC People First Society
BC Persons with AIDS Society
BC Real Estate Association
BC Schizophrenia Society
BC Society of Oral Medicine Specialists
BC Sports & Fitness Council for the Disabled
BC Widow's Association
BCEADS
Bosnian Community Living Association
Boundary Women's Resource Centre
BPW Victoria
Branching Out (Dawson Creek)
Bulkley Valley AIDS Society
Bulkley Valley Head Injury Association
Burnaby Association for the Mentally Handicapped
Burnaby Council of Women
Burnaby Mental Wealth Society
Business and Professional Women of BC & Yukon
Business & Professional Women's Club of BC & Yukon (Surrey Club)
Campbell River Brain Injury Support Group
Canadian Amputee Sports Association
Canadian Council of the Blind (BC-Yukon Division)
Canadian Hard of Hearing Association - BC Chapter
Canadian Hard of Hearing Association - Kelowna
Canadian Injured Workers Society
Canadian Mental Health Association - East Kootenay
Canadian Mental Health Association - B.C. Division
Canadian National Institute for the Blind
Canadian Taxpayers Federation
Cedar Cottage Adult Day Care
Central Interior Logging Association
Central Island Legal Support Staff Association
Central Okanagan Brain Injury Society
Cerebral Palsy Association of BC

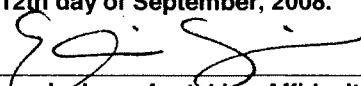
Chetwynd Women's Resource Society
Chronic Pain Support Network
City of Coquitlam - Mayor's Committee for People with Disabilities
CMHA - East Kootenay
Coalition to Promote Interdependent Living
Community Family Link Society of BC
Community Living Society
Comox Valley Head Injury Society
Comox Valley Parkinson's Support Group
Comox Valley Women's Resource Centre
COMPACT (Committee to Promote Accessible Conventional Transit
Consumer Development Project Penticton
Contact Women's Group Society
Cowichan Valley Head Injury Support Group
Cowichan Valley ILRC Society
Craftworks Society
Cranbrook Women's Resource Society
DAWN BC 1994 (DisAbled Women's Network)
DAWN Nanaimo (Disabled Women's Network)
DisAbled Women's Network - Canada
Downtown Eastside Women's Centre
Edmonds Seniors Society
Ethical Environment Researchers Consultants
f.a.p.g. (Federated Anti-Poverty Group)
Fairview Management - Prince Rupert & Smither's
Families As Support Teams Society
Family Support Institute
Fanny Bay OAPO
Fifty 567 (Chevy) Club Vancouver & Area Chapter
First Nations Council of Women
Fort Nelson Women's Resource Centre
Fort St. John Head Injury Society
Fort St. John Women's Resource Centre
Fraser Valley East Brain Injury Support Group
Golden Women's Resource Centre
Greater Nanaimo Chamber of Commerce
Greater Victoria Chamber of Commerce
Handy Circle Promotions Society
Head Start Program
Improvement Group (Burnaby)
Injured Workers' Human Rights Group
Interior Indian Friendship Society
Kamloops Brain Injury Association
Kamloops Business & Professional Women
Kamloops & District Real Estate Association
Kamloops Reporting Services
Kate Booth House
Kelowna Chamber of Commerce
Kelowna Women's Resource Centre
Kent Street Senior Citizens' Society
Kinsman Rehabilitation Foundation of BC
Kitimat Support Group
Kwantlen University College Student Association

Langley Aldergrove Brain Injury Support Group
L'Arche - Comox Valley
Law Students Association of UBC
Local Union No. 97 of the International Association of Bridge, Structural and Ornamental Iron Workers
Lower Mainland Brain Injury Association
Mainstream Society for Integrated Living
Maple Ridge Brain Injury Support Group
Marusyk, Rick (Mayor, Port Moody)
Massage Therapists' Association of BC
Mavis/McMullen Housing Society
M.E. Myalgia Encephalomyelitis Society of BC
Mission Association for Community Living
Mood Disorders Association of BC
Mothers Against Drinking Drivers (Canadian Society)
MSA Society for Community Living
Nanaimo Head Injury Society
Nanaimo Independent Living Centre
Nanaimo Widow's Support Group
Nanaimo Women's Business Network
Native Courtworker and Counseling Association of British Columbia (NCAA)
New Focus Society - Quesnel BC
New View Society
New Westminster Brain Injury Support Group
New Westminster Council of Women
Newton Advocacy Group Support
North Okanagan Handicapped Association
North Okanagan/Shuswap Head Injury Society
North Okanagan Youth & Family Services Society
North Shore Disability Resource Centre
North Shore Family Support Group
North Shore Parkinson's Disease Support Group
North Shore Women's Centre
Northwest Real Estate Board
Pacific Transit Cooperative
Peace Arch Community Services
Penticton Italian Canadian Society
People in Motion Kamloops
People in Motion, Kelowna
Planned Lifetime Advocacy Network
Plexus Consulting
Powell River Support Group
Prince George AIDS Society
Prince George Brain Injured Group Society
Prince George Business & Professional Women's Club
Quesnel Women's Resource Centre
Ray-Cam Co-operative Centre
RBO Architecture Inc.
Reflexology Association of BC
Relief Care Sitters
Resource Centre for Independent Living
Richmond Society for Community Living
Richmond Women's Resource Centre Association
Rid Roads of Impaired Drivers

Riverview Family Advocacy Group
R.O.R.Y. (Kelowna Injured Workers Group)
SAIL
Salmon Arm Brain Injury Support Group
Sechelt/Sunshine Coast Brain Injury Support Group
Sekora, Louis
Senior Citizens Association of BC
Senior Citizens Association - Branch #92
SFU - Centre for Students with Disabilities
South Granville Seniors Centre/Elders' Network
South Surrey/White Rock Women's Place
Sullivan, Sam (Councillor, City of Vancouver)
Sunshine Coast People with Disabilities
Surrey Chamber of Commerce
Surrey Crime Prevention Society
Surrey/Delta Brain Injury Support Group
Surrey Rehabilitation Society
Teamsters BC & Yukon Joint Council No. 36
Terrace Women's Centre
Trail Disabled Needs
Trial Lawyers Association of British Columbia
Tri-Cities (Coquitlam, Port Coquitlam and Port Moody) Chamber of Commerce
Ucluelet/Long Beach Support Network
Ukrainian Canadian Congress - Vancouver Branch
Ukrainian Canadian Professional and Business Association - Vancouver Branch
Ukrainian Women's Association of Canada - Whalley Branch
University of British Columbia Alma Mater Society
University of Northern BC - Councillling Centre
Valley View Health Group
Vanouver Aboriginal Friendship Centre Society
Vancouver Brain Injury Survivor Support Group
Vancouver Island Real Estate Board
Vancouver Resource Society
Vancouver White Cane Club
Vancouver Women's Health Collective
Vela Housing Society
Vernon and District Womens's Centre Society
Victoria Status of Women Action Group
Voice of the Cerebral Palsied of Greater Vancouver
West End Senior's Network Society
West Kootenay Cerebral Palsy Association
White Rock Brain Injury Support Group
White Rock & District Council of Women
Williams Lake Brain Injury Support Group
Women Against Violence Against Women
Women's Resource Centre - Cowichan Valley
Youth Community Outreach AIDS Society

Advertisement placed in the Vancouver Sun on
March 15th, 1997 and in the Province on March 16th, 1997
titled "PLEASE MR. PREMIER... DON'T TAKE
AWAY OUR RIGHTS"

This is Exhibit E referred to in the
Affidavit of Margaret Birrell
Sworn before me at the City of Vancouver, BC
this 12th day of September, 2008.



A Commissioner for taking Affidavits for
British Columbia

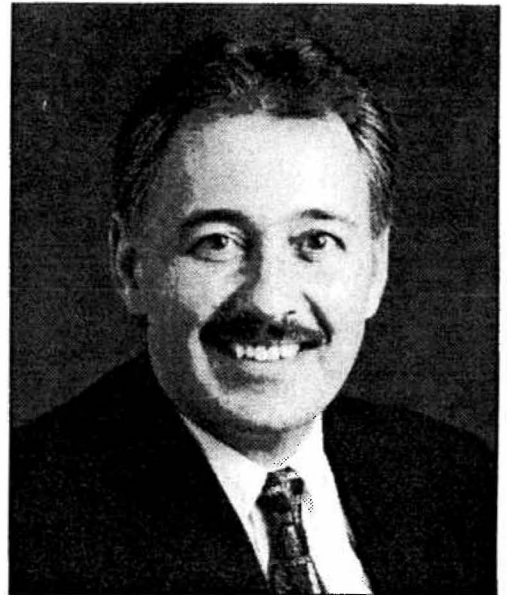
DEAR MR. PREMIER, HERE IS HOW ICBC CAN SAVE \$700 MILLION

13

You can keep ICBC rates down without threshold no-fault or deductible no-fault - and here is how:

	<i>Annual Savings:</i>
• <i>Accident Prevention</i>	<i>\$200 million</i>
• <i>Mandatory Mediation</i>	<i>\$130 million</i>
• <i>Enhanced Claims Management (Fraud Prevention)</i>	<i>\$100 million</i>
• <i>Anti-Theft Measures</i>	<i>\$26 million</i>
• <i>Increase Small Claims Court Limit</i>	<i>\$37 million</i>
• <i>More ICBC Defence Done In-House</i>	<i>\$11 million</i>
• <i>Improved Internal Efficiencies</i>	<i>\$33 million</i>
• <i>Use Premium Tax to Pay for Road Safety</i>	<i>\$30 million</i>
• <i>Revenue from Traffic Fines</i>	<i>\$100 million</i>
• <i>Private Insurance Profit Equalization</i>	<i>\$33 million</i>

Total Annual Savings: \$700 million



Threshold No-Fault or Deductible No-Fault Hurts Seniors, Women, Children, and People with Disabilities the most.

PLEASE MR. PREMIER ... DON'T TAKE AWAY OUR RIGHTS.

CALL TOLL FREE 1-888-224-8811 FOR MORE INFORMATION

A message from some of the groups concerned with this issue: Mothers Against Drinking Drivers (Canadian Society), BC Brain Injury Association, BC Coalition of People with Disabilities, BC Nurses' Union, BC Society of Oral Medicine Specialists, Business & Professional Women's Club of BC and Yukon (Surrey Club), Canadian Injured Workers Society, Canadian Mental Health Association (BC Division), Canadian Taxpayers Federation, Central Okanagan Brain Injury Association, Greater Victoria Chamber of Commerce, Injured Workers' Human Rights Group, Kamloops Brain Injury Association, Kamloops and District Real Estate Association, Kamloops Reporting Services, Kelowna Chamber of Commerce, M.E. Association of BC, Nanaimo Women's Business Network, Nanaimo Head Injury Society, Northwest Real Estate Board, Prince George Business & Professional Women's Club, Resource Centre for Independent Living, Rid Roads of Impaired Drivers, R.O.R.Y. (Kelowna Injured Workers Group), Surrey Chamber of Commerce, Surrey Crime Prevention Society, Trial Lawyers Association of British Columbia, Vancouver Island Real Estate Board, BC Citizens Against No-Fault Insurance, BC Widow's Association, Central Interior Logging Association, Central Island Legal Support Staff Association, Tri-Cities (Coquitlam, Port Coquitlam and Port Moody), Chamber of Commerce, Kinsman Rehabilitation Foundation of BC, Law Students Association of UBC, Nanaimo Widow's Support Group, New Westminster Council of Women, North Shore Women's Centre, White Rock & District Council of Women, Advocacy Outreach Society, Alzheimer Society of BC, ANKORS, Arthritis Society - Kelowna, BC Association for Community Living, BC Blind Sports & Recreation Association, BC People First Society, BC Persons with Aids Society, BC Sports & Fitness Council for the Disabled, BCEADS, Boundary Women's Resource Centre, BPW Victoria, Burnaby Association for the Mentally Handicapped, Burnaby Mental Wealth Society, Canadian Amputee Sports Association, Canadian Hard of Hearing Assn - BC Chapter, Canadian Nat'l Institute for the Blind, Cerebral Palsy Association of BC, City of Coquitlam - Mayor's Committee for People with Disabilities, Committee to Promote Accessible Conventional Transit, Community Family Link Society of BC, Comox Valley Parkinson's Support Group, Contact Women's Group Society, Cowichan Valley ILRC Society, Craftworks Society, Cranbrook Women's Resource Society, Disabled Women's Network - Canada, DAWN BC 1994 (Disabled Women's Network), DAWN Nanaimo (Disabled Women's Network), Family Support Institute, Fanny Bay OAPO, Fifty 567 (Chevy) Club Vancouver & Area Chapter, First Nations Council of Women, Fort Nelson Women's Resource Centre, Kelowna Women's Resource Centre, Lower Mainland Brain Injury Association, Mainstream Society for Integrated Living, Mood Disorders Association of BC, Nanaimo Independent Living Centre, Native Courtworker and Counselling Association of British Columbia (NCCA), New View Society, North Shore Disability Resource Centre, North Okanagan/ Shuswap Head Injury Society, Pacific Transit Cooperative, Peace Arch Community Services, Plexus Consulting, Quesnel Women's Resource Centre, Richmond Women's Resource Centre Association, Riverview Family Advocacy Group, SAIL, SFU - Centre for Students with Disabilities, Sam Sullivan (Councillor, City of Vancouver), Terrace Women's Centre, Vancouver Resource Society, Vancouver White Cane Club, Vancouver Women's Health Collective, Vela Housing Society, Victoria Status of Women Action Group, Voice of the Cerebral Palsied of Greater Vancouver, West Kootenay Cerebral Palsy Association, Women's Resource Centre - Cowichan Valley, Chronic Pain Support Network, Mission Association for Community Living, Ray-Cam Co-operative Centre, Surrey Rehabilitation Society, West End Seniors' Network Society, Rick Marusyk (Mayor, Port Moody).

Advertisement placed in a major newspaper titled
“PLEASE KEEP YOUR PROMISE MR. PREMIER”

This is Exhibit F referred to in the
Affidavit of Margaret Birrell
Sworn before me at the City of Vancouver, BC
this 12th day of September, 2008.



A Commissioner for taking Affidavits for
British Columbia

PLEASE KEEP YOUR PROMISE MR. PREMIER

15

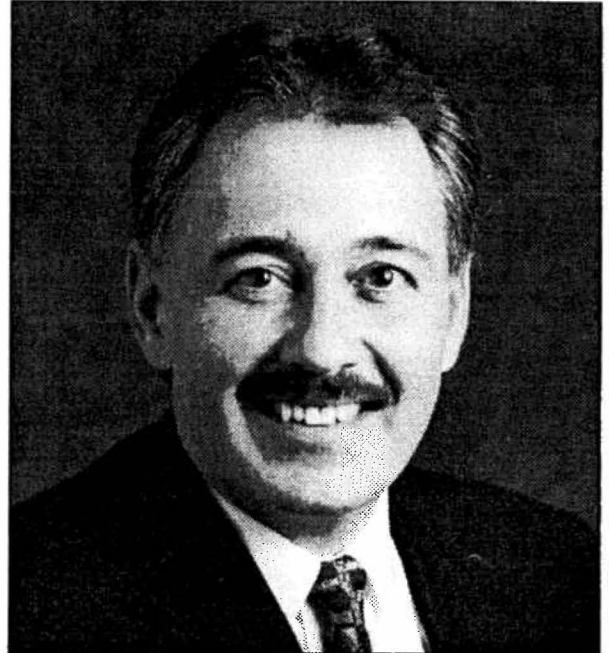
DURING THE LAST ELECTION, YOU PROMISED THAT YOU WOULD NOT BRING IN NO-FAULT OR ANYTHING LIKE IT.

Now ICBC is trying to convince you to break your promise by radically changing the system.

Thresholds, Injury Insurance, Deductibles or Motorist Protection Plans are all No-Fault and No Good.

- It removes our basic rights to have a court determine our true compensation. No-Fault gives that job to an insurance adjuster.
- Good drivers will pay for bad drivers.
- Benefits to innocent accident victims are drastically reduced.
- Thresholds and deductibles hurt seniors, women, children and people with disabilities the most.
- Premiums will go up.

**PLEASE MR. PREMIER ...
KEEP YOUR PROMISE.**




CALL TOLL FREE 1-888-224-8811 FOR MORE INFORMATION

Some of the groups concerned with this issue are: Mothers Against Drinking Drivers (Canadian Society), BC Brain Injury Association, BC Coalition of People with Disabilities, BC Nurses' Union, BC Society of Oral Medicine Specialists, Business & Professional Women's Club of BC and Yukon (Surrey Club), Canadian Injured Workers Society, Canadian Mental Health Association (BC Division), Canadian Taxpayers Federation, Central Okanagan Brain Injury Association, Greater Victoria Chamber of Commerce, Injured Workers' Human Rights Group, Kamloops Brain Injury Association, Kamloops and District Real Estate Association, Kamloops Reporting Services, Kelowna Chamber of Commerce, M.E. Association of BC, Nanaimo Women's Business Network, Nanaimo Head Injury Society, Northwest Real Estate Board, Prince George Business & Professional Women's Club, Resource Centre for Independent Living, Rid Roads of Impaired Drivers, R.O.R.Y. (Kelowna Injured Workers Group), Surrey Chamber of Commerce, Surrey Crime Prevention Society, Trial Lawyers Association of British Columbia, Vancouver Island Real Estate Board, BC Citizens Against No-Fault Insurance, BC Widow's Association, Central Interior Logging Association, Central Island Legal Support Staff Association, Tri-Cities (Coquitlam, Port Coquitlam and Port Moody), Chamber of Commerce, Kinsman Rehabilitation Foundation of BC, Law Students Association of UBC, Nanaimo Widow's Support Group, New Westminster Council of Women, North Shore Women's Centre, White Rock & District Council of Women, Advocacy Outreach Society, Alzheimer Society of BC, ANKORS, Arthritis Society - Kelowna, BC Association for Community Living, BC Blind Sports & Recreation Association, BC People First Society, BC Persons with Aids Society, BC Sports & Fitness Council for the Disabled, BCEADS, Burnaby Association for the Mentally Handicapped, Burnaby Mental Wealth Society, Canadian Amputee Sports Association, Canadian Hard of Hearing Assn - BC Chapter, Canadian Nat'l Institute for the Blind, Cerebral Palsy Association of BC, City of Coquitlam - Mayor's Committee for People with Disabilities, Committee to Promote Accessible Conventional Transit, Community Family Link Society of BC, Contact Women's Group Society, Cowichan Valley ILRC Society, Craftworks Society, Cranbrook Women's Resource Society, DisAbled Women's Network - Canada, Family Support Institute, Fanny Bay OAPO, First Nations Council of Women, Fort Nelson Women's Resource Centre, Kelowna Women's Resource Centre, Mainstream Society for Integrated Living, Mood Disorders Association of BC, Nanaimo Independent Living Centre, New View Society, North Shore Disability Resource Centre, Pacific Transit Cooperative, Plexus Consulting, Quesnel Women's Resource Centre, SAIL, SFU - Centre for Students with Disabilities, Sam Sullivan (Councillor, City of Vancouver), Terrace Women's Centre, Vancouver Resource Society, Vancouver

Advertisement placed in the Province and the Vancouver Sun on June 25th, 1997, titled “Thank You Premier Clark for listening!”

This is Exhibit G referred to in the
Affidavit of Margaret Birrell
Sworn before me at the City of Vancouver, BC
this 12th day of September, 2008.



A Commissioner for taking Affidavits for
British Columbia

Thank You Premier Clark for listening!

During the past year, our membership, representing more than 200 groups and organizations throughout British Columbia, urged you to reject no-fault auto insurance.

The coalition urged you to implement a road-safety program to reduce accidents and save lives as well as protect our rights and compensation.

You agreed. Instead of introducing no-fault, you decided to get tough on bad drivers by implementing comprehensive traffic-safety initiatives.



Thank You Premier Clark. You Listened.

Groups concerned with this issue include:

Action Committee of People with Disabilities
 Active Retirees of Steelworkers of America - Vancouver
 Adult Learning Disabilities Association (ALDA)
 Advocacy Outreach Society
 Alberni Valley Head Injury Society
 Alzheimer Society of BC
 ANKORS
 Arbutus Vocational Society
 Arthritis Society - Kelowna
 A.V. Athletes Support Society
 Battered Women's Support Services
 BC Association for Community Living
 BC Blind Sports & Recreation Association
 BC Brain Injury Association
 BC Citizens Against No-Fault Insurance
 BC Chamber of Commerce

BC Chiropractic Association
 BC Coalition of People with Disabilities
 BC Nurses' Union
 BC Old Age Pensioners Organization
 BC People First Society
 BC Persons With AIDS Society
 BC Real Estate Association
 BC Schizophrenia Society
 BC Society of Oral Medicine Specialists
 BC Sports & Fitness Council for the Disabled
 BC Widows' Association
 BCEADS
 Boston Community Living Association
 Boundary Women's Resource Centre
 BFW Victoria
 Branching Out (Dawson Creek)
 Bulkley Valley AIDS Society

Bulkley Valley Head Injury Association
 Burnaby Association for the Mentally Handicapped
 Burnaby Council of Women
 Burnaby Mental Wealth Society
 Business and Professional Women of BC & Yukon
 Business & Professional Women's Club of BC & Yukon (Surrey Club)
 Campbell River Brain Injury Support Group
 Canadian Amputee Sports Association
 Canadian Council of the Blind (BC-Yukon Division)
 Canadian Hard of Hearing Association - BC Chapter
 Canadian Hard of Hearing Association - Kelowna
 Canadian Injured Workers Society
 Canadian Mental Health Association (East Kootenay)
 Canadian Mental Health Association (BC Division)
 Canadian National Institute for the Blind
 Canadian Taxpayers Federation

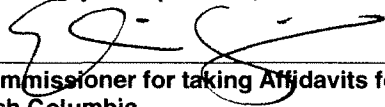
- Cedar Cottage Adult Day Care
- Central Interior Logging Association
- Central Island Legal Support Staff Association
- Central Okanagan Brain Injury Society
- Cerebral Palsy Association of BC
- Cheyenne Women's Resource Society
- Chronic Pain Support Network
- City of Coquitlam - Mayor's Committee for People with Disabilities
- CMHA - East Kootenay
- Coalition to Promote Interdependent Living
- Committee to Promote Accessible Conventional Transit
- Community Family Link Society of BC
- Community Living Society
- Comox Valley Head Injury Society
- Comox Valley Parkinson's Support Group
- Comox Valley Women's Resource Centre
- COMPACT (Committee to Promote Accessible Conventional Transit)
- Consumer Development Project Practicum
- Contact Women's Group Society
- Cowichan Valley Head Injury Support Group
- Cowichan Valley (HRC) Society
- Craftworks Society
- Cranbrook Women's Resource Society
- DAWN BC 1994
- (Disabled Women's Network)
- DAWN Memorial
- (Disabled Women's Network)
- Disabled Women's Network - Canada
- Downtown Eastside Women's Centre
- Edmunds Genuis Society
- Ethical Environmental Researchers Consultants
- Family Support Institute
- Fanny Bay OAPD
- Fifty 567 (Chevy) Club Vancouver & Area Chapter
- First Nations Council of Women
- Fort Nelson Women's Resource Centre
- Fort St. John Head Injury Society
- I.a.p.g. (Federated Anti-Poverty Group)
- Forview Management - Prince Rupert
- 25members
- Family As Support Team Society
- Fort St. John Women's Resource Centre
- Fraser Valley East Brain Injury Support Group
- Golden Women's Resource Centre
- Greater Nanaimo Chamber of Commerce
- Greater Victoria Chamber of Commerce
- Handy Circle Promotions Society
- Head Start Program
- Improvement Group (Burnaby)
- Injured Workers' Human Rights Group
- Interior Indian Friendship Society
- Kare South House
- Kamloops Brain Injury Association
- Kamloops Business & Professional Women
- Kamloops & District Real Estate Association
- Kamloops Reporting Services
- Kelowna Chamber of Commerce
- Kelowna Women's Resource Centre
- Keat Street Senior Citizens' Society
- Kiesman Rehabilitation Foundation of BC
- Kittimot Support Group
- Kwantlen University College Student Association
- Langley Aldergrove Brain Injury Support Group
- L'Arche - Comox Valley
- Law Students Association of UBC
- Lewis Sakara
- Lower Mainland Brain Injury Association
- Mainstream Society for Integrated Living
- Maple Ridge Brain Injury Support Group
- Massage Therapists' Association of BC
- Mavis/McMullen Housing Society
- M.E. Myeloma Encephalomyelitis Society of BC
- Mission Association for Community Living
- Mood Disorders Association of BC
- Workers Against Drinking Drivers (Canadian Society)
- MSA Society for Community Living
- Nanaimo Head Injury Society
- Nanaimo Independent Living Centre
- Nanaimo Widows' Support Group
- Nanaimo Women's Business Network
- Native Courtworker and Counseling Association of British Columbia (NCAA)
- New Four Society - Quesnel BC
- New View Society
- New Westminster Brain Injury Support Group
- New Westminster Council of Women
- Newton Advocacy Group Society
- North Okanagan Handicapped Association
- North Okanagan/Shuswap Head Injury Society
- North Okanagan Youth & Family Services Society
- North Shore Disability Resource Centre
- North Shore Family Support Group
- North Shore Parkinson's Disease Support Group
- North Shore Women's Centre
- Northwest Real Estate Board
- Pacific Transit Cooperative
- Peace Arch Community Services
- People in Motion Kamloops
- People in Motion Kelowna
- Position Italian Canadian Society
- Planned Lifetime Advocacy Network
- Plexus Consulting
- Powell River Support Group
- Prince George AIDS Society
- Prince George Brain Injured Group Society
- Prince George Business & Professional Women's Club
- Quesnel Women's Resource Centre
- Ray-Cam Co-operative Centre
- RBO (Rehabilitation Inc.)
- Rehabilitation Association of BC
- Relief Care Sisters
- Resource Centre for Independent Living
- Richmond Society for Community Living
- Richmond Women's Resource Centre Association
- "Rick Maravich (Mayor, Port Moody)"
- Rid Roads of Impaired Drivers
- Riverview Family Advocacy Group
- R.O.R.Y. (Kelowna Injured Workers Group)
- S. Surrey/White Rock Women's Place
- SJLH
- Solman Arm Brain Injury Support Group
- "Tom Sullivan (Councillor, City of Vancouver)"
- Strickland/Sunshine Coast Brain Injury Support Group
- Straits Citizens Association of BC
- Sunrise Citizens Association - #2
- SFU - Centre for Students with Disabilities
- Simon Fraser Student Society
- South Granville Seniors Centre/ Elder's Network
- Sunshine Coast People with Disabilities
- Surrey Chamber of Commerce
- Surrey Crime Prevention Society
- Surrey/Delta Brain Injury Support Group
- Surrey Rehabilitation Society
- Township BC & Yukon Joint Council No. 36
- Terrace Women's Centre
- Trob Disabled Needs
- Trial Lawyers Association of British Columbia
- "Tri-Cities (Coquitlam, Port Coquitlam and Port Moody) Chamber of Commerce"
- Ullecel/Long Beach Support Network
- Ukrainian Canadian Congress - Vancouver Branch
- Ukrainian Canadian Professional and Business Association - Vancouver Branch
- Ukrainian Women's Association of Canada - Whalley Branch
- University of British Columbia
- Alma Mater Society
- University of Mathews BC - Counseling Centre
- Valley View Health Group
- Vancouver Aboriginal Friendship Centre Society
- Vancouver Brain Injury Survivor Support Group
- Vancouver Island Real Estate Board
- Vancouver Resource Society
- Vancouver White Care Club
- Vancouver Women's Health Collective
- Vale Housing Society
- Vernon and District Women's Centre Society
- Victoria Status of Women Action Group
- Vote of the Cerebral Palsied of Greater Vancouver
- West End Senior's Network Society
- West Kootenay Cerebral Palsy Association
- Western Institute for Deaf and Hard of Hearing
- White Rock Brain Injury Support Group
- White Rock & District Council of Women
- Williams Lake Brain Injury Support Group
- Women's Resource Centre - Cowichan Valley
- Women Against Violence Against Women
- Youth Community Outreach AIDS Society



TO DONATE TO THE COALITION OR FOR MORE INFORMATION ON NO-FAULT CALL 1-888-224-8811

Advertisement placed in the Province, February 26th
1997, titled "WHAT IS ICBC'S REAL AGENDA? --
NO-FAULT!"

This is Exhibit H referred to in the
Affidavit of Margaret Birrell
Sworn before me at the City of Vancouver, BC
this 12th day of September, 2008.



A Commissioner for taking Affidavits for
British Columbia

WHAT IS ICBC'S REAL AGENDA? - NO-FAULT!

What is the Truth about ICBC's Finances?

- "The results have been very positive. The projected income will bring reserves to \$354 Million... and allow the Corporation to keep rates at or below inflation for the third year in a row." *ICBC 1996 Operating Plan pg.2*
- ICBC plans "a net income of \$20 Million" for 1996. *ICBC 1996 Operating Plan pg. 29*
- ICBC has \$4.5 Billion in reserves which generates \$1 Million in interest a day!
ICBC Nov. 1996 Interim Financial Statement

This has been planned for a long time by ICBC.

- "The current system will be replaced by a comprehensive no-fault system."
ICBC No-Fault Plan 1993 pg.1
- "The Government and the Corporation (ICBC) must dictate the agenda... through effective use of the media." *ICBC No-Fault Plan 1993 pg. 43*
- "To do this effectively, it is essential that all special interest and lobby groups be identified at the outset. Strategies should be developed for each to co-opt their support where possible or to isolate them as clearly defined interest groups who do not have the public interest at heart." *ICBC No-Fault Plan 1993 pg. 43*



ICBC is misusing your premium dollars to push through a scheme that will claw-back benefits from people with disabilities and innocent accident victims. It's about power and taking away your rights.


YOUR PREMIUMS WILL GO UP AND NINE OUT OF TEN INNOCENT INJURY VICTIMS WILL GET LESS COMPENSATION
Thresholds, Deductibles, or Injury Insurance are all No-Fault

CALL TOLL FREE 1-888-224-8811 FOR MORE INFORMATION

Some of the groups concerned with this issue are: BC Brain Injury Association, BC Coalition of People with Disabilities, Business & Professional Women's Club of BC and Yukon (Surrey Club), Canadian Injured Workers Society, Canadian Taxpayers Federation, Central Okanagan Brain Injury Association, Greater Victoria Chamber of Commerce, Injured Workers' Human Rights Group, Kamloops Brain Injury Association, Kamloops and District Real Estate Association, Kamloops Reporting Services, Kelowna Chamber of Commerce, M.E. Association of BC, Mothers Against Drinking Drivers (Canadian Society), Nanaimo Women's Business Network, Nanaimo Head Injury Society, Northwest Real Estate Board, Prince George Business & Professional Women's Club, Resource Centre for Independent Living, Rid Roads of Impaired Drivers, R.O.R.Y. (Kelowna Injured Workers Group), Surrey Chamber of Commerce, Surrey Crime Prevention Society, Trial Lawyers Association of British Columbia, Vancouver Island Real Estate Board, BC Citizens Against No-Fault Insurance, BC Widow's Association, Central Interior Logging Association, Central Island Legal Support Staff Association, Tri-Cities (Coquitlam, Port Coquitlam and Port Moody), Chamber of Commerce, Kinsman Rehabilitation Foundation of BC, Law Students Association of UBC, Nanaimo Widow's Support Group, New Westminster Council of Women, North Shore Women's Centre, White Rock & District Council of Women, Advocacy Outreach Society, Alzheimer Society of BC, ANKORS, Arthritis Society - Kelowna, BC Association for Community Living, BC Blind Sports & Recreation Association, BC Nurses' Union, BC People First Society, BC Persons with Aids Society, BC Sports & Fitness Council for the Disabled, BCEADS, Burnaby Association for the Mentally Handicapped, Burnaby Mental Wealth Society, Canadian Amputee Sports Association, Canadian Hard of Hearing Assn - BC Chapter, Canadian Nat'l Institute for the Blind, Cerebral Palsy Association of BC, City of Coquitlam - Mayor's Committee for People with Disabilities, Committee to Promote Accessible Conventional Transit, Community Family Link Society of BC, Contact Women's Group Society, Cowichan Valley ILRC Society, Craftworks Society, Cranbrook Women's Resource Society, DisAbled Women's Network - Canada, Family Support Institute, Fanny Bay OAPO, First Nations Council of Women, Fort Nelson Women's Resource Centre, Kelowna Women's Resource Centre, Mainstream Society for Integrated Living, Mood Disorders Association of BC, Nanaimo Independent Living Centre, New View Society, North Shore Disability Resource Centre, Pacific Transit Cooperative, Plexus Consulting, Quesnel Women's Resource Centre, SAII SFU - Centre for Students with Disabilities, Sam Sullivan (Councillor, City of Vancouver), Terrace Women's Resource Centre, Women's Health Collective, Vela Housing Society, Victoria Status of Women's Resource Centre.

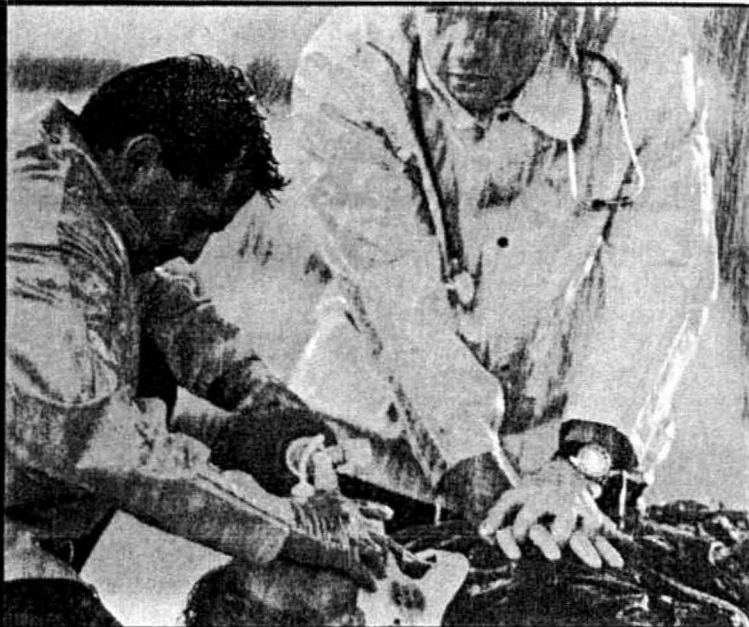
Advertisement placed in the Province, March 23rd 1997
and in the Vancouver Sun, March 22nd and April 1st 1997,
titled “In a matter of weeks, the BC Government and
ICBC will introduce NO-FAULT Legislation”

This is Exhibit I referred to in the
Affidavit of Margaret Birrell
Sworn before me at the City of Vancouver, BC
this 12th day of September, 2008.



A Commissioner for taking Affidavits for
British Columbia

In a matter of weeks, the BC Government and ICBC will introduce **NO-FAULT** Legislation



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They claim, without no-fault – your premiums will rise by 40% – because they say ICBC is in financial trouble. **But**, ICBC admits it made a profit of \$354 million during the last three years – and planned a profit for 1996.

If Their No-Fault Plans Become Law It Will Mean:

- 9-out-of-10 accident victims will not get compensated for pain and suffering
- Your compensation for lost income will be drastically reduced or eliminated
- 92% of car accident victims will lose their right to sue for fair compensation
- ICBC will have total control over your life if you are injured in an accident

Stop the No-Fault Assault!

Call or Fax Premier Glen Clark Today

Tomorrow may be too late!

Greater Vancouver **Call 431-8119**

Greater Victoria **Call 387-1715**

Other areas within BC **1-800-663-7867**

(Ask to be transferred to Glen Clark)

Premier Clark's fax numbers:

604-660-0279 (Vancouver) or

250-387-0087 (Victoria)

Or write to Premier Clark:

Parliament Buildings,


Victoria BC V8V 1X4



A message from some of the groups concerned with this issue: Mothers Against Drinking Drivers (Canadian Society), BC Brain Injury Association, BC Coalition of People with Disabilities, BC Nurses' Union, BC Society of Oral Medicine Specialists, Business & Professional Women's Club of BC and Yukon (Surrey Club), Canadian Injured Workers Society, Canadian Mental Health Association (BC Division), Canadian Taxpayers Federation, Central Okanagan Brain Injury Association, Greater Victoria Chamber of Commerce, Injured Workers' Human Rights Group, Kamloops Brain Injury Association, Kamloops and District Real Estate Association, Kamloops Reporting Services, Kelowna Chamber of Commerce, M.E. Association of BC, Nanaimo Women's Business Network, Nanaimo Head Injury Society, Northwest Real Estate Board, Prince George Business & Professional Women's Club, Resource Centre for Independent Living, Rid Roads of Impaired Drivers, R.O.R.Y. (Kelowna Injured Workers Group), Surrey Chamber of Commerce, Surrey Crime Prevention Society, Trial Lawyers Association of British Columbia, Vancouver Island Real Estate Board, BC Citizens Against No-Fault Insurance, BC Widow's Association, Central Interior Logging Association, Central Island Legal Support Staff Association, Tri-Cities (Coquitlam, Port Coquitlam and Port Moody), Chamber of Commerce, Kinsman Rehabilitation Foundation of BC, Law Students Association of UBC, Nanaimo Widow's Support Group, New Westminster Council of Women, North Shore Women's Centre, White Rock & District Council of Women, Advocacy Outreach Society, Alberni Valley Head Injury Society, Alzheimer Society of BC, ANKORS, Arthritis Society - Kelowna, BC Association for Community Living, BC Blind Sports & Recreation Association, BC People First Society, BC Persons with Aids Society, BC Sports & Fitness Council for the Disabled, BCEADS, Boundary Women's Resource Centre, BPW Victoria, Bulkley Valley Head Injury Association, Burnaby Association for the Mentally Handicapped, Burnaby Mental Wealth Society, Business & Professional Women of BC & Yukon, Campbell River Brain Injury Support Group, Canadian Amputee Sports Association, Canadian Hard of Hearing Assn - BC Chapter, Canadian Nat'l Institute for the Blind, Cerebral Palsy Association of BC, City of Coquitlam - Mayor's Committee for People with Disabilities, Committee to Promote Accessible Conventional Transit, Community Family Link Society of BC, Comox Valley Head Injury Society, Comox Valley Parkinson's Support Group, Contact Women's Group Society, Cowichan Valley ILRC Society, Craftworks Society, Cranbrook Women's Resource Society, DisAbleD Women's Network - Canada, DAWN BC 1994 (Disabled Women's Network), DAWN Nanaimo (Disabled Women's Network), Family Support Institute, Fanny Bay OAPO, Fifty 567 (Chevy) Club Vancouver & Area Chapter, First Nations Council of Women, Fort Nelson Women's Resource Centre, Fort St. John Head Injury Society, Fraser Valley East Brain Injury Support Group, Head Start Program, Improvement Group (Burnaby), Kamloops Business & Professional Women, Kelowna Women's Resource Centre, Lower Mainland Brain Injury Association, Mainstream Society for Integrated Living, Mood Disorders Association of BC, Nanaimo Independent Living Centre, Native Courtworker and Counselling Association of British Columbia (NCCA), New View Society, North Okanagan/Shuswap Head Injury Society, North Shore Disability Resource Centre, North Shore Family Support Group, Pacific Transit Cooperative, Peace Arch Community Services, Plexus Consulting, Powell River Support Group, Quesnel Women's Resource Centre, Richmond Women's Resource Centre Association, Riverview Family Advocacy Group, SAIL, Salmon Arm Brain Injury Support Group, Sechelt/Sunshine Coast Brain Injury Support Group, SFU - Centre for Students with Disabilities, Sam Sullivan (Councillor, City of Vancouver), Terrace Women's Centre, Ucluelet/Long Beach Support Network, The Ukrainian Women's Association of Canada, Vancouver Resource Society, Vancouver White Cane Club, Vancouver Women's Health Collective, Vela Housing Society, Victoria Status of Women Action Group, Voice of the Cerebral Palsied of Greater Vancouver, West Kootenay Cerebral Palsy Association, White Rock Brain Injury

Advertisement placed in the Province on April 13th, 1997,
headed “Imagine ICBC having total control over your
life”

This is Exhibit J referred to in the
Affidavit of Margaret Birrell
Sworn before me at the City of Vancouver, BC
this 12th day of September, 2008.


A Commissioner for taking Affidavits for
British Columbia



Imagine ICBC having total control over your life.

If their Threshold and Deductible No-Fault Plans become law:

- ▶ Your compensation for lost wages will be drastically cut or eliminated
- ▶ You'll lose your right to go to court
- ▶ Your pain and suffering will not be compensated in 9 out of 10 accidents
- ▶ Your insurance premiums will go way up

**Call Premier Glen Clark today!
Tell him to stop the No-Fault Assault.**

In Greater
Vancouver CALL 431-8119

In Greater
Vancouver FAX 660-0279

In Greater
Victoria CALL 387-1715

In Greater
Victoria FAX 387-0087

Other Areas
Within BC 1-800-663-7867

(Ask to be transferred to Glen Clark)

Groups concerned with

23

Aboriginal Outreach Society
Alouette Valley Head Injury Society
Alzheimer Society of BC
ANORC
Anxiety Society - Kelowna
BC Association for Community Living
BC Blind Sports & Recreation Association
BC Blind Youth Association
BC Citizens Against No-Fault Insurance
BC Coalition of People with Disabilities
BC Nurses Union
BC People First Society
BC People With AIDS Society
BC Society of Child Medicine Specialists
BC Youth & Family Centre for the Disabled
BC Women's Association
BILABS
Boundary Women's Resource Centre
BFW Victoria
Buckley Valley Head Injury Association
Burnaby Association for the Mentally Handicapped
Burnaby Council of Women
Burnaby Mental Health Society
Burnaby and Professional Women of B.C. & Fraser
Burnett & Professional Women's Club
of B.C. & Fraser (Surrey Unit)
Caledonia Rural Head Injury Support Group
Canadian Amputee Sports Association
Canadian Head of Hearing Association - BC Chapter
Canadian Injured Workers Society
Canadian Mental Health Association (BC Division)
Canadian National Institute for the Blind
Canadian Support Federation
Central Inland Legal Support Staff Association
Central Okanagan Head Injury Society
Central Valley Association of BC
Cherished Women's Resource Society
Chronic Pain Support Network
City of Kelowna - Mayor's Committee
for People with Disabilities
CNRA - East Kootenay
Committee to Promote Accessible Conventional Homes
Community Family Link Society of BC
Community Living Society
Columbia Valley Head Injury Society
Columbia Valley Parkinson's Support Group
Columbia Valley Women's Resource Centre
Creston Women's Group Society
Cowichan Valley Head Injury Support Group
Cowichan Valley IRL Society
Craftwork Society
Creston Women's Resource Society
DAWN BC 1994 (Disabled Women's Network)
DAWN Abbotsford (Disabled Women's Network)
Disabled Women's Network - Creston
Downtown Kelowna Women's Centre
Family Support Institute
Fifty Fifty Club
Fifty Fifty Club Vancouver & Area Chapter
First Nations Council of Women
Fort Nelson Women's Resource Centre
Fort St. John Head Injury Society
Fraser Valley Head Injury Support Group
Golden Women's Resource Centre
Greater Abbotsford Chapter of Commerce
Greater Okanagan Chapter of Commerce
Head Injury Paralysis Society
Head Start Program
Improvement Group (Burnaby)
Injured Women's Human Rights Group
Kelowna Business & Professional Women
Kelowna & District Real Estate Association
Kelowna Inno-Team Association
Kelowna Reporting Services
Kelowna Chapter of Commerce
Kelowna Women's Resource Centre
Kootenai Rehabilitation Foundation of BC




TO DONATE TO THE CO
INFORMATION ON NC

1-888-2

Advertisement placed in a major newspaper in April 1997
titled “In a matter of weeks, the BC Government and
ICBC plan to introduce No-Fault Legislation”

This is Exhibit K referred to in the
Affidavit of Margaret Birrell
Sworn before me at the City of Vancouver, BC
this 12th day of September, 2008.



A Commissioner for taking Affidavits for
British Columbia

25

In a matter of weeks, the BC Government and ICBC plan to introduce No-Fault Legislation

If their Threshold and Deductible
No-Fault Plans become law:

- ✦ Women, children, seniors and people with disabilities will be drastically under-compensated
- ✦ ICBC will introduce an unworkable WCB-style system (WCB is currently being investigated by a Royal Commission)
- ✦ ICBC will force you to see its doctors and specialists
Your doctor's opinion won't count
- ✦ Nine-out-of-ten accident victims will be denied compensation for pain and suffering
- ✦ You and your children could end up on welfare for two years or more while waiting for your CPP application to be processed
- ✦ ICBC will take away your legal right to challenge its decisions
- ✦ ICBC will drastically cut or eliminate your compensation for lost wages
- ✦ ICBC will make you apply for, and use all your UIC and Canada Pension Plan Disability (CPP) benefits before it pays a penny
- ✦ You could be forced to sell your home, spend all your savings and even be forced into bankruptcy – because ICBC won't adequately compensate your losses
- ✦ The deductible will be imposed on innocent accident victims and not the bad driver, as in other insurance plans
- ✦ Coverage for uninsured accident victims – cyclists, pedestrians and unregistered passengers – will revert to a total no-fault system.
- ✦ ICBC will have total control of your life

VOICE YOUR CONCERNS
BEFORE IT'S TOO LATE!

Come to the Town Hall Meeting and
join the debate on ICBC's Threshold and
Deductible No-Fault Plans.

Thursday, May 1, 1997
7PM, Inlet Theatre
Port Moody City Hall

This meeting is sponsored by the Coalition Against No-Fault in BC.
ICBC staff and members of the government will be
invited to present their views.

They claim without a No-Fault Threshold or Deductible
System, your premiums will increase dramatically...

▼
*The reality is that premiums have risen dramatically
in no-fault style systems across North America.*

They say ICBC is in financial trouble

▼
*The truth, in black and white, lies in ICBC's recently
released Annual Report. ICBC is not in financial crisis, in fact,
the corporation has a surplus of \$220 million
(December 31, 1996), and if you add investment gains
(not included in income by ICBC) the surplus is \$650 million.*

COME TO THE TOWN HALL MEETING
AND LEARN THE TRUTH.

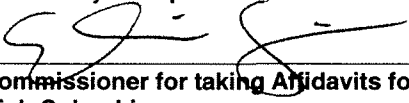
In the past few months, the Coalition Against No-Fault in
BC has grown to more than 150 groups and organizations
representing thousands of concerned people throughout
the province of British Columbia.



TO DONATE TO THE COALITION, OR FOR MORE INFORMATION
ON NO-FAULT CALL 1-888-224-8811 OR 682-1441

Extract from the BC Liberal Party Platform

**This is Exhibit L referred to in the
Affidavit of Margaret Birrell
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**A Commissioner for taking Affidavits for
British Columbia**

FOR BRITISH COLUMBIA

GREAT GOALS FOR A GOLDEN DECADE


- One* Make B.C. the best educated, most literate jurisdiction on the continent.
- Two* Lead the way in North America in healthy living and physical fitness.
- Three* Build the best system of support in Canada for persons with disabilities, special needs, children at risk, and seniors.
- Four* Lead the world in sustainable environmental management, with the best air and water quality, and the best fisheries management – bar none.
- Five* Create more jobs per capita than anywhere else in Canada.



It's time to dream big dreams again and to set great goals that oblige us to reach higher for our children, our families and our communities. It's time to realize the true promise of our province and to move forward with confidence, for British Columbia. A golden decade of opportunity lies ahead.

Screenshot of the community campaigns webpage of the
BCCPD website

**This is Exhibit M referred to in the
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British Columbia**



BC Coalition of People with Disabilities



[WHAT'S NEW](#) | [COMMUNITY CAMPAIGNS](#) | [PROJECTS](#) | [PROGRAMS & SERVICES](#) | [PUBLICATIONS](#) | [RESOURCES](#) | [SUPPORT & DONATIONS](#)

- Wrongful Death
- Increase Minimum Wage
- Part 7 Accident Benefits
- Who Benefits?
- Woodlands
- Limitation Act
- Equipment and Assistive Devices
- handyDART
- Hepatitis C
- Archives

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You are here: [HOME](#) > [COMMUNITY CAMPAIGNS](#)

Community Campaigns

BCCPD initiates and/or collaborates with other organizations in community campaigns on specific issues that affect people with disabilities. These campaigns can involve public awareness and education, law reform, raising community support – or any combination of the above.

Some of our current campaigns include:

- Seeking compensation and justice for survivors of **Woodlands School**
- Proposing a new organization for custom transit (**handyDART**) in BC
- A brief and awareness campaign called "**Who Benefits?**" to improve BC's disability benefits program

In these pages, you will also often see letters of support or other actions you can take to support this work. Please come back often and add your voice to our community campaigns.

Improving Disability Benefits



See BCCPD's **Who Benefits?** paper outlining 4 main areas of disability benefits that must be changed to meet people with disabilities' needs.

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