



Interview Summary: Liberal Party of Canada (Azam Ishmael)

Azam Ishmael, the National Director of the Liberal Party of Canada (“**LPC**” or the “**Party**”), was interviewed by Commission counsel on August 20, 2024.

Notes to Readers:

- Commission Counsel have provided explanatory notes in square brackets to assist the reader.

1. Background

- [1] Azam Ishmael has served as the National Director of the LPC since 2017. In 2021, he also served as the Party’s National Campaign Director.

2. Awareness and Responses to Foreign Interference

- [2] The LPC is aware that all political parties are vulnerable to Foreign Interference (“**FI**”), especially as it relates to electronic communications and information technology. These vulnerabilities are not specific to the LPC, however, as all parties and party leaders are targeted by FI.
- [3] FI is only one of the threats political parties have to be aware of. Mr. Ishmael stated that, as political operatives, he and his team are mindful of all internet-based threats, such as ransomware and internal vulnerabilities, which can be, but are not necessarily, linked to foreign actors.
- [4] The Party’s primary source of knowledge of FI threats is the SITE briefings the Party has received. Meetings with national security agencies are sporadic and tend to occur only when an election campaign is on. The LPC takes meetings with the national security agencies when they are offered.

- [5] In the IT domain, the LPC adheres to IT industry “best practices” and consults with outside IT professionals. The risks are not solely FI related. Government agencies provide some useful IT-related information to the LPC’s IT administrators.

3. Systems in Place within the Party to respond to FI threats

3.1 How party handles threats

- [6] Within the Party, there is no person, committee or group tasked with responding to FI threats specifically, and there is no formal structure or protocol in place for doing so. If there were an FI threat to the Party, it would fall on senior staff to formulate an action plan. For intelligence-related threats, the LPC would consult legal authorities in formulating a response.
- [7] Which persons would be responsible for responding to a specific threat will depend on the nature of the threat, though Mr. Ishmael, as CEO of the organization, is ultimately responsible for coordinating a response to any threat. In the case of a campaign-related threat, the national campaign director would bear significant responsibility. As appropriate, the leader of the Party would be consulted. There is a general expectation at the national board level that important issues would be brought to their attention, but senior staff are expected to act quickly if the threat demands it. Senior staff and subject-matter experts would be empowered to advise what steps need to be taken.
- [8] The LPC does not engage in tabletop exercise to consider how it would respond to an FI threat. Mr. Ishmael stated that senior LPC staff deal with all manner of crises, and that an FI threat would be addressed in the same way as other crises. Crisis management generally relies on the “flag method” – e.g. when a potential problem is identified, it is flagged to the next level in the hierarchy, which determines how to deal with the problem. If the problem is of a legal nature, the LPC will consult with legal experts. The LPC is used to dealing with urgent problems.
- [9] When it comes to FI-related threats, the LPC would consult with government experts to deal with the threat. For an election-related FI threat, the SITE task force would be advised, or other appropriate government authorities; for threats to life, relevant law

enforcement agencies would be advised. By and large, the LPC has a high degree of trust in governmental institutions, without regard for which party is in power.

3.2 Threats relating to mis- and disinformation

- [10] Mis- and disinformation are so widespread and so ubiquitous that it is difficult for the Party to determine for itself what is real and what isn't, so there are no formal structures within the Party to combat it directly. Often, the media takes up the role of countering mis- or disinformation by asking Party officials if something is true or not. The Party does monitor media output when specific issues come up, but resources are limited such that it cannot spend all of its time countering mis- and disinformation. Mis- and disinformation are not a FI specific problem. Mis- and disinformation is often spread by domestic political actors themselves. It is difficult for the Party to identify whether mis- or disinformation has originated with a foreign actor or not. Given the volume of mis- and disinformation that circulates online, the Party is not equipped to track and react to every false statement that emerges.

3.3 Assisting candidates with FI-related threats

- [11] The LPC makes government materials about FI-related threats available to its candidates, including a 1-800 number set up by the Communications Security Establishment (“**CSE**”) to report such threats.
- [12] The LPC also tries to be preventative. For example, as the Party believes the main FI-related threat is from cyberattacks, the Party offers training to candidates on how to secure their devices. This training is largely based on resources offered by government agencies. Candidate and volunteer training is an ongoing process, and training is available on a multitude of topics, including FI, but also other topics such as door-knocking. Mr. Ishmael stated that candidates realistically do not have the time to undergo all of the training that is made available by the Party. Training about FI awareness, particularly with respect to cyber security, is made available to candidates, but it is not mandatory.

- [13] If a candidate suspects they are the victim of a FI-related threat, they would be expected to report the threat through the usual campaign structure. A candidate would report the threat to their local campaign organization, which would then report it to the provincial organization and on to the national organization. There is no formal, FI-specific process for candidates to report FI-related threats.
- [14] Likewise, there is no formalized process for how to proceed if a candidate were to be suspected of complicity in FI. Mr. Ishmael stated that the way a threat like that is dealt with depends on the source of the information. Campaign organizers might investigate the validity of the claim to assess if it is serious enough to meet the bar of involving senior organizers to deal with it, perhaps by having a conversation with the persons involved. Depending on the seriousness of the threat, the information may be shared with government, and perhaps the leader will have to be informed in necessary and serious circumstances.
- [15] Mr. Ishmael stated that the LPC is a democratic organization. Accordingly, an FI-related threat would have to be very credible for party leaders to supersede a local organization's choice of candidate. There would have to be much more than a shadow of doubt over a candidate for the Party to overturn the will of the voting members of a riding association. If there was suitable evidence, the leader of the Party would be brought into that conversation. The reaction to such a threat may depend on the timing of the allegation.
- [16] If a threat arises and the choice is to do nothing for the moment, there is no formal mechanism to follow up on the issue at a later date.
- [17] If the threat concerned a staff member, the person might be terminated in accordance with the normal employment rules. That might be the end of the process or, depending on the nature of the specific threat, other steps might be taken.
- [18] Another challenge at the campaign level is that each individual riding campaign is its own entity with its own hiring practices. The LPC provides information about best practices, but individual campaigns are largely independent in terms of hiring and HR-related matters. Each riding campaign will decide whether the candidate takes part in

the hiring process or the process of accepting volunteers. In some riding campaigns, those decisions lie solely with the local campaign manager.

- [19] Political staffers attached to elected politicians are covered by ordinary employment rules. If there is a problem with a staffer, FI-related or otherwise, the LPC would investigate it as an HR problem, like any other professional organization.

4. Electronic Infrastructure

4.1 How the LPC ensures the security of its electronic infrastructure

- [20] In response to reporting about Russian attempts to interfere with the 2016 American election and related cybersecurity concerns, the Liberal party consulted with cybersecurity experts and the Party's IT staff oversaw the updating of the Party's approach to cybersecurity. While this work was largely internal to the Party's practices, processes, and infrastructure, it also included ensuring that the Party's candidates were aware of cybersecurity risks they may be exposed to.
- [21] The Canadian Center for Cyber Security ("CCCS") publishes a candidate manual relating to cybersecurity that the Party shared with its candidates, but LPC staff found the manual to be daunting, dense, and inaccessible, so the Party only provides links to it. Instead, the Party includes a one-page document focused on cybersecurity in its own Party booklet for candidates and campaign staff.
- [22] Mr. Ishmael reported that the LPC has continued to follow experts' recommendations made in 2019. He is not aware of any significant breaches to LPC systems since then. Recommendations include the use of 2-factor identification and the use of reputable vendors.
- [23] Mr. Ishmael stated that government agencies, including the CCCS, take an active role in providing updated information to political parties because this environment is ever-changing. When he has met with government agencies, Mr. Ishmael told them it would be helpful to have training videos on cyber security and to keep the materials evergreen. Mr. Ishmael was of the view that the materials provided by government agencies tends to be very dense and that they should provide more concise materials. It

is not enough, in his opinion, for government agencies to post information on their website, which political parties have to monitor of their own accord. Information should be disseminated in a more efficient and appropriate format.

- [24] The LPC maintains its own database with information about candidates, voter lists, volunteers lists, and the like, called “Liberalist.” The information included in the database is safeguarded and access to it is tiered, with local campaign organizations having access to local information, provincial organizations to information on a provincial scale, and so on. According to the LPC’s user agreement with its provider, access to sensitive information is audited after every campaign. The provider monitors any suspicious use on an ongoing basis.
- [25] The Party relied on reputable vendors. Most of the Party’s vendors, such as Microsoft or NGP VAN, are world-class companies that have an ongoing responsibility to ensure the security of their clients’ systems. These companies undergo security reviews on an ongoing basis.
- [26] One challenge is that government agencies do not provide parties with lists of recommended vendors, and will not confirm whether a specific vendors is reliable.

4.2 Use of government IT systems by Members of Parliament

- [27] Members of Parliament (“**MPs**”) are not permitted to use government IT systems and hardware (computers and cell phones) for campaigning or fundraising. All candidates, including sitting MPs, must provide their own personal IT systems and hardware for campaigning and fundraising.
- [28] Neither the Party nor government offer technology or tech support to candidates. The LPC provides candidates with information about best practices on how to protect their IT. It also provides IT support to its own staff, but not to candidates, local campaign staff, or local campaign volunteers, who must handle their own IT needs. If they suspect that their systems have been compromised, their reporting mechanism is to contact the Party for assistance or, for more serious threats, to use the CSE 1-800 number.

[29] Asked if the data on these personal devices might provide a foreign threat actor with valuable information about campaign strategy or fundraising, or even blackmail material, Mr. Ishmael acknowledged that this was an area of significant potential vulnerability.

5. Nomination contests

5.1 The “greenlighting process”

[30] A person must be “greenlit” by the Party in order to be eligible to stand as the LPC candidate or run in a nomination contest. The vetting process does not specifically address FI-related threats. However, candidates provide a lot of information to the Party when being considered. As a general rule, greenlighting will be withheld if there is anything about a potential candidate that might bring the party into disrepute – and a risk of FI would be one of those things.

[31] According to Mr. Ishmael, political parties offer a valuable public service by vetting their potential candidates. This acts as an important check on the people entering Parliament. Parties require things like a credit check and a police records check. Vetting is done by volunteers, who, generally speaking, come from the legal profession. Their professional training is leveraged to assess candidates’ credibility and to look out for anomalies in a candidate’s background. Though generally very experienced in getting to the bottom of a story, volunteers assigned to vetting candidates do not receive training that relates specifically to FI threats.

5.2 FI vulnerabilities in the nomination process.

[32] Mr. Ishmael is of the view that there may be vulnerabilities in the individual layers of the nomination process, but those vulnerabilities are abated when the layers of the nomination process are considered together. It is the tapestry of systems that makes the nomination process secure. Though he considers the LPC to be a target of FI, Mr. Ishmael does not think that it has been a victim of FI.

[33] When asked about whether parties are vulnerable because nomination contests often involve relatively small numbers of voters, and the difference between winning and

losing a contest can come down to a few dozen votes, Mr. Ishmael opined that this vulnerability is more theoretical than real. Mr. Ishmael observed that, in practice, a) most candidates run for nomination unopposed, b) though the situation is more complex when they are opposed and the contest is close, the process is difficult to tamper with.

[34] Mr. Ishmael was asked about the LPC's rules governing challenges to voting qualifications. The rule sets out as follows:

If a Qualified Nomination Contestant wants to challenge an individual's right to vote, they must do so by the date and time set by the National Campaign Chair or their designate. Challenges may be made with respect to the following:

- a. whether the address shown on the voters list is accurate;*
- b. whether the Eligible Voter lives at such address;*
- c. whether the Eligible Voter is a member of another federal political party;*
- d. whether any other qualifications to be a Registered Liberal established by the National Board and listed in By-law 4 have been met.¹*

[35] Mr. Ishmael was asked about how this rule is applied in practice, and what information is given to candidates relating to the voting list that would allow them to challenge a vote or the outcome of a vote.

[36] Mr. Ishmael stated that the system is made secure by its layered nature. Campaigns get a copy of the list of eligible voters in advance of the nomination vote. When the nomination process was more paper-driven, challenges were based on things like voter eligibility and the authenticity of signatures. In the electronic age, the postal code validator removes any possibility that a voter does not live in the right constituency. Challenges are made directly at the nomination contest itself, where, at the accreditation table, voters have to prove their identity and their residency using official documents (e.g. driver's license, pieces of official mail). This verification process is

¹ LPC Institutional Report, p. 17, LIB0000002/LIB0000004.

monitored by the Party and by the competing campaigns in an environment that is meant to mimic the process used by Elections Canada during an election.

- [37] No records are kept of how a nomination voter has proven their identity and demonstrated that they meet the residency requirements. Mr. Ishmael was of the view that there would be no value in keeping such records because validations are based on gold-standard third party evidence, such as government-issued ID. Keeping a record would not add anything to the process.

6. Party Member Registration

- [38] Criteria to register as a member of the LPC include a) being at least 14 years of age and b) ordinarily living in Canada. There is no citizenship requirement for persons living in Canada.

6.1 The absence of a citizenship requirement

- [39] Mr. Ishmael stated that the citizenship provisions have been in their current form for decades. To his view, there is no citizenship requirement because, on a philosophical level, the idea of a political party is to get people engaged in their community and set people on a democratic journey by participating in the process of choosing party candidates. If non-citizens are allowed to volunteer in support of a candidate, they should not be deprived of the opportunity to participate in choosing that candidate at a party level.
- [40] On a more practical level, citizenship is more challenging to validate than residency, and imposing such a requirement would do little to curb FI concerns because it would be based on an “honour system” anyway. Citizenship can only be proven with documents such as a birth certificate or a passport, so even if a citizenship requirement were imposed, it would be based on self-reporting. Requiring political parties to scrutinize the citizenship of nomination voters more closely than Elections Canada scrutinizes the eligibility of voters in a federal election would set an untenably high bar.
- [41] When asked whether he believed foreign governments would have the ability to coerce their citizens living in Canada to vote for a specific candidate, Mr. Ishmael replied that

foreign governments can try to do so, but at the end of the day, voters are protected by the secret ballot, which is the same mechanism used by Elections Canada to protect against this issue. In any event, a) voter coercion can also be domestic and b) it would be very hard for a foreign actor, or any actor, to coordinate hundreds of people to vote for a specific candidate without authorities being alerted. In Mr. Ishmael's view, the system is much more vulnerable to mis- and disinformation and cyberattacks, because those interference techniques can have a mass impact.

6.2 Permitting voting by minors

[42] Mr. Ishmael was asked whether voters under 18 years of age might be more susceptible to outside pressure, thus making the system potentially more vulnerable. Mr. Ishmael replied that the age threshold has existed for decades. To his mind, the purpose behind permitting those who are 14 years of age and above to vote is to encourage engagement with the Party. Mr. Ishmael stated that the main determinant for becoming a life-long voter is whether a person accompanied their parents to vote. As for non-nationals, Mr. Ishmael believes that if teens are allowed to volunteer for a candidate, they should be allowed the opportunity to participate in the choice of candidate at the party level. The LPC's philosophy is to be maximally inclusive, and voting in nomination contests is the only way that people under 18 years of age have a chance to express a political preference. Including young people in the candidate-selection process makes the Party richer because they push policy issues that might not be promoted by older generations.

6.3 The absence of a fee to become a LPC member

[43] It was put to Mr. Ishmael that payment of a small membership fee may allow parties to have an ID-verified record of party members and may provide some protection against bulk sign-ups, as well as making it more difficult for a foreign actor to press groups of people into its service.

[44] Mr. Ishmael provided his personal views on this point: the LPC constitution allows for charging a fee, though the Party does not do so currently require fees to be paid. Mr. Ishmael was concerned that charging a fee would create friction in the registration

process and would not provide any effective protection against FI because people can always pay anonymously using a prepaid credit card.

[45] Mr. Ishmael suggested that the goal is to ensure a system with absolute integrity, and that absolute integrity should be balanced with the risk of disenfranchisement. Additional measures may not always provide significant additional protection against FI, and may come at a cost to political engagement.

[46] According to Mr. Ishmael, the LPC nomination process is modelled after the robust one set out in the *Elections Canada Act*, noting that there is no fee to vote in an election. Nefarious actors, foreign or otherwise, could always find a way to get around it, and they would still be faced with the problem of coordinating hundreds of people to achieve their ends.

6.4 Views regarding proposed reforms to the nomination contest process

[47] Commission counsel asked Mr. Ishmael his views on various proposed reforms to the nomination contest process. Mr. Ishmael indicated that he could express his initial personal reactions, but that any proposal would have to be considered in detail before he could express the Party's position on any of them. The following are Mr. Ishmael's initial personal reactions to various policy proposals:

- Notifying Elections Canada in advance of a nomination contest: As the rules currently stand, a party need notify Elections Canada only after a contest has taken place. Mr. Ishmael was of the view that such a requirement might be acceptable, but that it was the details of such a regulation that would really matter. It is not clear to Mr. Ishmael how the proposal would counter FI.
- Permitting only citizens and permanent residents to vote in nomination contests: Mr. Ishmael reiterated his views on a citizenship requirement summarized above.
- Requiring party nomination rules to be publicly posted: Mr. Ishmael observed that LPC nomination rules were already publicly available.

- Requiring the publication of full nomination contest results: Mr. Ishmael said that such a requirement would do material disservice to candidates and the process as a whole, as it would allow rival candidates and other politicians to weaponize vote results to further attack losing candidates.
- Requiring all candidates to file a full financial return: Mr. Ishmael expressed doubt that such a requirement would be effective in countering FI. In any event, in a campaign where less than \$1,000 was spent, the requirement would create friction within the system, which would discourage more people from participating in the political process.
- Administrating nomination contests by independent officials, such as Elections Canada: The details of such a proposal would matter greatly. It would depend very much on how Elections Canada would administer a nomination contest on a two-day notice. It would also depend on how Elections Canada would apply LPC-specific rules versus other parties' rules.
- Enforcing nomination rules by an external agency, such as the OCCE: Mr. Ishmael expressed that the proposal was interesting but, again, the details would matter: would the proposal create a dispute mechanism parallel to the existing LPC one? Who would have final jurisdiction?
- Expanding the offences in the *Canada Elections Act* for intimidation, fraudulent voting, or undue foreign influence to include nomination contests: Nomination votes should have as much integrity as possible, but Mr. Ishmael would want to know what the dispute resolution mechanism would look like.

7. Leadership Contests

[48] Mr. Ishmael was asked whether the party had any views about the vulnerability of leadership contests. Mr. Ishmael stated that, as with nomination contests, it is the layers of protection built into the system that protect it. Even if a riding were compromised by FI, which could only be achieved by coordinating hundreds of people, compromising a

national leadership vote would require the coordination of hundreds of thousands of people. This is highly improbable.

[49] As with nomination contests, though leadership contests may be the target of FI attempts, they are not vulnerable to FI. Existing rules, including political financing rules of leadership contests are effective in protecting the system.

[50] Mr. Ishmael could not opine on the specific about how the internal leadership campaign expense rule would apply, because these rules change from one contest to another. The Party's finance department looks for anomalies when it comes to spending in leadership contests. The finance department sees all the money coming through its portals and is in a good position to keep and analyze records. LPC records are subject to external audit.

[51] Asked about the role of SITE in addressing threats to leadership contests, Mr. Ishmael emphasized that, if information is to be shared, it should be credible and actionable. Mr. Ishmael opined that mis- and disinformation, as well as cyberattacks, are a much more credible threat to our system, rather than the possibility of foreign actors manipulating the machinery of political parties.

8. Political Finance

[52] Asked if the LPC engaged in activities to confirm the origin of funds used to make donations, Mr. Ishmael stated that the Party relied on self-declarations as well the internal monitoring done by credit card providers and payment processes. If a transaction was determined to be ineligible, the LPC would follow Elections Canada guidelines and return funds within 30 days.

[53] Mr. Ishmael observed that Elections Canada had recently closed the loophole on cryptocurrencies, which was a good initiative in his opinion. Mr. Ishmael's main worry is how third-party entities are set up. A foreign state could engage in activities it, as an entity, would otherwise be prohibited in participating under the *Canada Elections Act*.