



Interview Summary: Conservative Party of Canada (Michael Crase)

Michael Crase, Executive Director of the Conservative Party of Canada (the “**CPC**” or the “**Party**”), was interviewed by Commission Counsel on September 4, 2024.

Notes to Readers:

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

1. Background

- [1] Mr. Crase has a long history with the CPC, first as a volunteer and later as a staff member. He has served as Executive Director of the CPC since November 2022. Prior to assuming this role, Mr. Crase served as Executive Director of the Progressive Conservative Party of Ontario since 2018. Before that, he was a regional organizer for the CPC, between 2010 and 2015.

2. Awareness of Foreign Interference Issues

- [2] Mr. Crase indicated that the CPC is concerned about the integrity and security of elections in general, which would include ensuring elections are security from foreign interference (“**FI**”) threats. He noted that FI threats had been raised by the CPC’s Leader and members of its Parliamentary Caucus as a policy concern Mr. Crase has not personally been involved in discussions within the Party related to FI. The Party’s information on FI is comprised of open-source resources, and its ongoing engagement with the SITE Taskforce (“**SITE**”).
- [3] The CPC’s Director of Operations (who is responsible for regulatory affairs), Trevor Bailey, regularly participates in SITE meetings and has been the CPC’s designated

representative since the 2021 election. He attends briefings and receives post-election reports.

- [4] While the Party's administration has no reason to believe that FI is a standalone or unique point of vulnerability to the Party's processes and structures, it maintains an active interest in preserving and enhancing the general integrity and security of democratic processes, including nomination contests. To that end, the Party has implemented controls in its nomination races to ensure their integrity, irrespective of the nature of the threat.
- [5] Since the 2021 election, the Party has taken steps to enhance the integrity of its processes and structures generally, including eliminating bulk membership sales and removing the ability to pay for memberships with a prepaid credit card or non-personalized money order. While these changes have not been in specific response to public reporting on FI threats, they are designed to protect the integrity of the Party's processes. Mr. Crase explained that the Party is attentive to the threat landscape and will take any further steps required closer to the next general election. Additionally, as noted below, the Party's Director of Operations is in regular contact with the Canadian Centre for Cyber Security ("CCCS") and works with them on staying informed about potential cyber threats.

3. Systems in Place within the CPC to mitigate against FI Threats

3.1 Monitoring by Various Individuals and Entities

- [6] There are several positions and committees within the Party that monitor the external threat landscape on an ongoing basis to ensure the integrity of its processes. While these positions and committees are not specifically dedicated to threats that may arise from FI, Mr. Crase expects that these positions and committees would be the ones that would respond to any such threat that arises.
- [7] One such position is the Director of Operations, described above, as well as the Director of Memberships, who monitors and flags suspicious activity involving new or renewing CPC memberships, including using automated processes that flag irregular

submissions for memberships. In addition, the National Council Selection Committee (“**NCSC**”), a committee of the Party’s National Council (the Party’s governing body) is responsible for reviewing and addressing irregularities during nomination contests, including those relating to FI were any to be identified. Mr. Crase emphasized that the CPC is not aware of FI-related integrity issues with any of its previous nomination contests.

3.2 Mechanisms Available to Assist Nomination Contestants

- [8] Any allegations of FI brought to the Party’s attention would be captured by existing processes that ensure the integrity of these races. Nomination contestants can submit complaints relating to a variety of issues, including FI related issues.
- [9] Once a complaint is received, the Party’s political operations team conducts a preliminary enquiry to assess the allegations with the assistance of the Party’s counsel, including assessing their credibility and the evidence supporting them. Depending on the findings of this preliminary assessment, the Party then takes appropriate steps under either with the direction of NSCS or the Party’s Secretariat Committee (another committee of National Council) depending on the nature of the complaint.
- [10] Mr. Crase indicated that he was not aware of any contestants being targeted by FI or by foreign state actors (aside from Kaveh Shahrooz’s public comments addressed below). Mr. Crase indicated that he believes the Party’s current mechanisms are fairly robust for dealing with any nomination contest integrity issues including FI. Should evidence arise that FI poses distinct threats that the Party’s current mechanisms are not well equipped to handle, the party will determine a strategy for dealing with them.

3.3 Mechanisms Available to Assist EDAs

- [11] The CPC has never faced any allegations that one of its EDAs has been compromised by FI. He noted that the Party’s membership rules are strict.
- [12] When asked about the allegation in the NSICOP report that the PRC attempted to obtain control of a federal EDA, Mr. Crase indicated that the Party was aware of this allegation but had no further information and had no reason to believe the concern was

about a CPC EDA. He explained that, were such a situation to arise, the Party has mechanisms in place to address any inappropriate behaviour (including FI-related misconduct), such as removing directors, de-registering an EDA, and revoking a member's membership.

- [13] For example, the board of directors of an EDA may initiate a complaint against a CPC member for breach of the CPC's Code of Conduct (the "**Code**"). The Code's scope encompasses a variety of common issues, such as discrimination, harassment, conflict of interest and violence. It does not contain any provision specific to FI. The Code provides for a wide range of remedies, such as warnings, suspensions, informal resolutions, or revocation of membership. These complaints are submitted to the CPC's Head of Human Resources, who then involves Mr. Crase and the Party's counsel.
- [14] Revocation of membership for conduct deemed improper or unbecoming is the most extreme and powerful tool available to the Party. The revocation process may be initiated by the Party's Executive Director or an EDA Board of Directors, who then engage a process managed by the Party's Secretariat Committee. The member is contacted and given the opportunity to respond. While the process is underway, the member's rights as a Party member may be suspended. Conduct that could lead to revocation of membership in the Party include criminal activity and hate speech.
- [15] The Code applies to conduct by CPC members towards other members and volunteers. To the extent a member engages in behaviour towards a third-party, the Code's applicability depends on the nature of the allegations.
- [16] An EDA is able to remove a director for having engaged in conduct that would harm the reputation of the Party through a two-third vote by the EDA's directors. Mr. Crase is not aware of any FI-related issues or incidents with EDA board members.
- [17] Mr. Crase noted that most of the issues that arise within EDAs are interpersonal problems, such as bullying. In many instances, these interpersonal problems are resolved at the local level without rising to the level of informing Mr. Crase, although the Party's regional organizer would likely be aware of any removal of an EDA director. As such, Mr. Crase is not personally aware of any specific situations where an EDA has removed a director in his time as Executive Director.

3.4 Electronic Infrastructure

- [18] Other than one incident involving one employee's email account that was compromised, the CPC has not had any issues or breaches of its IT systems. In response to the email account incident, the Party took prompt action, including by retaining IBM's cyber security team to ensure there was no broader vulnerability to its systems. This incident was not FI-related, and, given the results of IBM's review indicating that there was no personal or confidential data accessed or taken and the incident had been limited to a single account, it was not reported to any governmental authorities.
- [19] The Party has several controls in place to ensure the integrity of its IT systems. For example, it uses recognized vendors to process payments, has various financial controls in place and has implemented IT best practices such as two-factor authentication and email filters to capture suspicious incoming messages. The Party has full-time staff to manage the security of its databases and is in the process of recruiting for a dedicated cybersecurity role in its IT department.
- [20] The Party's Director of Operations has ongoing contact with the CCCS, including participating in weekly briefings covering monitored cyber incidents of note.
- [21] Websites for election candidates are managed by the Party, as is access to the centralized Party database and the Party's mobile app for canvassing. The Party provides IT security for these platforms. However, candidates are responsible for providing and securing their own devices. The candidates have a single point of contact at the Party's headquarters for all issues they encounter, whether IT-related or not.
- [22] Nomination contestants, in contrast, are required to organize and manage their own IT infrastructure, including websites, and do not have access to the Party's database.

4. Framework for CPC Membership

- [23] Canadian citizens and permanent residents above the age of 14 are eligible to become members of the CPC. A prospective member is required to attest to their citizenship and residency on the membership application form.

- [24] No parental consent is required for those under the age of majority to become members. Involving young persons in the political process has been a long-standing principle of the CPC.
- [25] Membership fees are the same amount throughout the country. The CPC works to ensure that the person purporting to buy a membership can demonstrate that they are funding the purchase. Controls include requiring verified methods of payment.
- [26] The CPC stopped accepting cash payments following the 2015 election. At present, memberships can be paid for by personal cheque, personal credit card or a money order from a Canadian financial institution. The CPC prohibits using cash, pre-paid credit cards (which are easily identifiable by the card number) or corporate credit cards to purchase memberships.
- [27] In around June 2023, the CPC amended its by-laws to prohibit the purchase of bulk memberships. This followed from a change in the 2022 leadership race in which the submission of bulk memberships had also been prohibited during that process. Previously, a single Party member could sign up new members in bulk by submitting a list of new members and their personal details. Payment for the new memberships was submitted by the member organizing the bulk purchase—usually a nomination or leadership candidate.
- [28] Bulk purchases were eliminated as a “best practice”, not in response to FI concerns. Bulk memberships were deemed an area of concern because it was a challenge to verify the provenance of the new memberships and because of the administrative burden bulk memberships placed on the Party.
- [29] To ensure members personally fund their memberships, in addition to monitoring the source of payments, the CPC monitors the IP address of the purchaser. For example, the use of IP addresses outside of Canada would be flagged, as would the use of the same IP address to purchase multiple memberships. (It is permissible for up to six related family members residing at the same address to pay with one form of payment.) Memberships that are flagged would be manually verified to confirm the identity of the purchasing member.

- [30] There is a lag between when an application is received and when a virtual membership card is issued. During this period, all payments received are examined. The Director of Membership is constantly monitoring applications and their trends. If no issue is flagged, payment is then processed. If an issue is flagged, the Director of Membership would make inquiries and take action as necessary.
- [31] Mr. Crase indicated that there is a list of individuals who are not eligible to be members of the CPC, such as those who have previously been rejected, those who have given up their memberships and those who have had their memberships revoked.

5. Nomination Contests

- [32] Mr. Crase stated that the CPC has not received any credible information attesting to vulnerabilities in its nomination contests, including as they relate to FI. According to Mr. Crase, the Party has robust protections in place to ensure those casting votes are legitimate CPC members. The stringent rules around the procurement of CPC memberships also afford protections in nomination contests.

5.1 The Nomination Contest Process

- [33] When a member indicates their interest in participating in an upcoming nomination contest, they receive login credentials to access an online portal to access application forms and submit required information. There is little to no vetting carried out at this point. Those interested in running for the nomination will typically attempt to sign up new members and to solicit support from existing CPC members.
- [34] When the party is ready to proceed with the nomination contest, party headquarters will issue a closing notice. Prospective new members have 48 hours from the closing notice to join the Party to be eligible to vote in the nomination and prospective nomination contestants have 14 days to submit a completed nomination contestant package. Once submitted, nomination contestant packages are sent to the research team at the CPC for review and investigation.
- [35] The vetting process does not specifically address FI vulnerabilities but concerns about FI vulnerability may arise through a person's work history, social media use and

professional links. Mr. Crase indicated that the Party requires prospective nomination contestants to provide their consent under the *Privacy Act* for disclosure from the Canadian Border Services Agency, Canada Revenue Agency, Immigration, Refugees and Citizenship Canada, and the Department of National Defence.

- [36] Should the review process raise any questions, an interview can be organized with the prospective nomination contestant. The interview is conducted by, at first instance, by a local “Candidate Nominating Committee” comprised of certain EDA directors and members and a designate of Mr. Crase, which is usually the party’s regional organizer for the area. Mr. Crase’s designate is entitled to a vote on the Candidate Nominating Committee. The interview panel then decides whether to approve or reject the contestant. The aim of the interview process is to ensure voters will be comfortable voting for that contestant.
- [37] The NCSC reviews the interview panel’s decision and can choose to either uphold or overturn their decision. In this process, the NCSC may also interview the nomination contestant. A decision to disallow a prospective nomination contestant by the NCSC can be appealed to the National Council, whose decision is final.
- [38] There are three ways a person can become a CPC candidate without winning a nomination contest: (1) they are acclaimed as the candidate by virtue of being the sole person approved during the vetting process; (2) no applicants successfully apply to be nomination contestant in the electoral district, in which case any further action concerning a nomination process for the electoral district is subject to the discretion of the Executive Director (subject to consultation requirements), which could result in a candidate being selected by the NCSC; or (3) an election is called and there is no time to implement the regular nomination contest procedures, in which case Mr. Crase (as Executive Director) and the Party President, in consultation with the chair of NCSC may alter, abridge or suspend the procedures as they see fit.
- [39] Under the current nomination procedures, sitting MPs were not required to participate in a nomination contest, or undergo a vetting process, provided they met certain fundraising goals.

[40] The CPC retains the discretion to withdraw the candidacy of a candidate at any time, even if that candidate won a nomination contest or was otherwise approved.

5.2 The Voting Process

[41] The nomination contest meeting must take place within 47 days of the issuance of the closing notice. The Party aims to provide candidates with enough time to campaign for support amongst the membership.

[42] All nomination meetings are required to be held in person. However, members are not allowed to vote by proxy. In one instance, the Party has allowed voting by mail given the geographic size of an electoral district. Nomination contest meetings are organized and run by the Party, with the support of the EDA's CNC, but not the direct involvement of the local EDA itself.

[43] The voting process is designed to ensure only legitimate members can vote. In the weeks leading up to the nomination meeting, a voters list is centrally prepared by the Party. The Party's system and platform are locked down around the same time, and the list is produced to each contestant. Contestants are able to review the list and challenge the presence or absence of anyone on the list. In practice, these lists are usually used to identify members who have been erroneously excluded. They are rarely used by candidates to challenge the validity of those named on the list.

[44] The Executive Director appoints the returning officer to oversee the nomination meeting. Under Mr. Crase's tenure, the returning officer has always been Party staff, who are neutral and experienced in this area. Each candidate is permitted to have scrutineers oversee the voting and counting process.

[45] To be permitted to vote, a member's name must appear on the membership list and the person must provide identification to verify their name and address. These are strict requirements and the information on the ID cards must align with the information on the membership list. In the event of any discrepancy, the member is required to present to a credentials desk ran by CPC staff and the returning officer, who will take steps to verify the person's identity and residency.

- [46] During the vote, scrutineers can challenge the eligibility of a voter. The voter's credentials would then be verified, along with their documentation. Mr. Crase indicated these challenges occur more frequently during nomination meetings than in an election. Candidates can bring any concerns they have about irregularities in the process to the attention of the returning officer, who has the power to remove any individual from the venue.
- [47] Mr. Crase noted that the CPC's rules for voting in nomination contests is stricter than the voting process under Elections Canada—for example, the CPC prohibits the practice of vouching for the identify and/or residence another member—which would help prevent abuse by foreign actors.
- [48] The winner of the nomination contest is publicly announced at the meeting. However, as a matter of tradition, the count remains secret. The Director of Political Operations is notified of the count but only informs the NCSC of the identity of the winner. The results of a nomination meeting are not archived, and the ballots used are kept for approximately 5 days and then discarded, unless an appeal is lodged.
- [49] Following the vote, a contestant has 5 days to appeal either the results or the conduct of a nomination meeting. The appeal body may invalidate the result of the meeting and call for a new nomination meeting. This mechanism is sometimes used but has never been invoked in relation to FI concerns.
- [50] After the 5-day period has expired, concerns can still be brought to the Party's attention. Ultimately, the Party retains the discretion to withdraw a person's candidacy at any point in time.

5.3 Allegations in the Richmond Hill Nomination Contest

- [51] Mr. Crase was given an opportunity to respond to the allegations raised by Kaveh Shahrooz relating to Mr. Shahrooz's experience in the Richmond Hill nomination contest. [Mr. Shahrooz has alleged that he was the victim of FI during the 2024 Richmond Hill nomination contest including inorganic cyberactivity against him and threats to his safety.]

- [52] Mr. Crase was aware of these allegations when Mr. Shahrooz made them public via Twitter/X. However, he does not recall receiving any specific information about the allegations, nor does he recall receiving any evidence in support for the allegations.
- [53] Mr. Crase noted that Mr. Shahrooz never submitted his nomination contestant package to the party, and that the Party has less engagement with individuals who have not yet taken that step.
- [54] While Mr. Shahrooz may have had conversations with the CPC's political operations team, Mr. Crase does not believe Mr. Shahrooz submitted documentation or other evidence for the Party to consider. Moreover, there were no complaints submitted to the NCSC or under the Code regime. As such, there was no investigation carried out by the Party.
- [55] Mr. Crase indicated that it would be hard for the CPC to understand or quantify an allegation of being targeted in an "inorganic" way, as alleged by Mr. Shahrooz, and questioned whether the CPC should be monitoring and involving itself in the online political discourse in the absence of concrete, credible evidence of unlawful conduct.
- [56] To the extent a nomination contestant noticed inorganic social media attacks, as alleged by Mr. Shahrooz, the CPC does not have any specific policies or tools to detect, monitor and combat the online expression of support or opposition to a candidate in a nomination contest. Similarly, the Party does not have a procedure to deal with anonymous online commentary about a contestant's candidacy, either in nomination contests or electoral races.

6. Leadership Contests

- [57] Mr. Crase is not in a position to comment on whether the party has any views on the vulnerability of leadership contests in general as he became Executive Director of the Party after the last CPC leadership contest was held, and he was not involved in it. There is no prospect for a leadership contest in foreseeable future and, as the Party's current mechanisms were able to handle integrity concerns during the last leadership contest (discuss below), this has not something the Party has had to address.

- [58] When asked about the allegation contained in the NSICOP report that CPC leadership races have been the target of FI attempts by India and China, Mr. Crase stated that he has not seen or heard of any evidence supporting this allegation, and that he has no information beyond what is included in the public NSICOP report.
- [59] As far as Mr. Crase is aware, the only allegation potentially relating to FI in a leadership contest involved an attempt to circumvent Party systems designed to prevent a person from purchasing multiple memberships on a single credit card (including pre-paid credit cards) using the membership portal assigned to the leadership campaign for a leadership contestant (who, for certainty, was not the ultimate winner of the contest). This irregularity was discovered after the CPC conducted an audit during the 2022 leadership contest in the course of preparing the voters list. Given the non-compliance, the prospective members were not accepted and, thus, never included on the voters list.
- [60] When the Party learned of the irregularity, it reported it to the Office of the Commissioner of Canada Elections (“**OCCE**”) through a complaint on OCCE’s web portal. The OCCE carried out an investigation and determined some “minor breaches of the Act”. It appears the CPC’s internal monitoring had caught other irregularities and rejected payments which would have otherwise offended the Act. OCCE determined that it was not in the public interest to pursue the matter further and closed the file. This was communicated to the Party on February 16, 2024.¹ At the time it learned of the irregularities, the party did not seek to ascertain whether there was foreign involvement in this incident as the Party believed this type of investigation fell under the OCCE’s mandate.
- [61] Mr. Crase declined to comment on the political financing rules under the *Canada Elections Act* and whether they play a role in preventing FI. Given he was not an employee of the Party during the 2022 leadership contest and given there is no prospect of a leadership race in the foreseeable future, has not considered this issue.

¹ See CPC0000009 and CPC0000009.001.

6.1 Rules around Leadership Contests

- [62] The rules for each leadership contest are set by the Leadership Election Organizing Committee, subject to the requirements of the CPC's Constitution. For example, the Constitution mandates that each member be permitted to cast one vote. The Leadership Election Organizing Committee is dissolved following each leadership contest.
- [63] Voting for the leadership contests occurs by mail ballot. To vote, members are required to provide a photocopy of the same forms identification they would otherwise have to produce for in-person voting in nomination contests. The return envelopes contain barcodes that allow the Party to keep track of who has voted but not who they voted for.
- [64] Aside from general steps implemented for the 2022 leadership contest (e.g., the removal of bulk membership submissions and prohibiting the use of prepaid credit cards and non-personalized money orders), the CPC has not taken any specific steps to strengthen future leadership contests against potential FI. If any such steps were identified as being appropriate, there would be an opportunity to implement them in advance of any future leadership contest.
- [65] Mr. Crase declined to comment on behalf of the Party on whether it would be desirable to have a government body, similar to the Panel of 5, empowered to act during party leadership contests. He noted that any such proposal would require careful consideration of its concrete details and the input of a range of Party stakeholders, including the Leader, the Parliamentary Caucus, and party members.

7. Legislative Reforms

- [66] Commission Counsel asked Mr. Crase to provide his opinion on a list of potential legislative reforms. Mr. Crase emphasized that he would provide answers based on his own personal views, and that such views are not necessarily official party positions. He again noted that any such proposals would require careful consideration of their concrete details and the input of a range of Party stakeholders, including the Leader, the Parliamentary Caucus, and party members.
- [67] Possible reforms canvassed with Mr. Crase include:

- a. Notifying Elections Canada in advance of a nomination contest: Mr. Crase stated that there was nothing *prima facie* to oppose given the Party already issues notice of nomination contests, but that he would prefer having all the details of the proposal before commenting.
- b. Permitting only citizens to vote in nomination contests: Mr. Crase indicated he could not answer, as this would be a substantive change to the process of both nomination and leadership contests, which are aligned with the current *Canada Elections Act* requirements to be eligible to donate to a political party.
- c. Requiring parties to publicly post nomination/leadership contest rules: Mr. Crase noted that the CPC already posts contest rules on its website. When asked whether all parties should follow suit, he declined to comment on how other parties should conduct themselves.
- d. Requiring the publication of the full results of nomination/leadership contest votes: Mr. Crase offered no opinion on this proposal.
- e. Requiring all contestants to file a full financial return: Mr. Crase stated that this question is better addressed to Elections Canada.
- f. Prohibiting the bulk purchase of party memberships: Mr. Crase observed that the CPC already prohibits this practice because it is the right thing to do.
- g. Administration of nomination/leadership votes by independent officials, such as Elections Canada: Mr. Crase stated that a proper answer would require a better appreciation of the details of the proposal. In any event, the CPC is confident in its current processes, including where they are more stringent than Election Canada processes.
- h. Enforcement of nomination/leadership rules by an external agency, such as the OCCE: Same as above.
- i. Expansion of prohibitions contained in the *CEA* that currently apply to only elections to also cover nomination / leadership contests (e.g. intimidation, fraudulently voting, undue foreign influence): Mr. Crase stated that there are

many differences across the rules of different parties. This lack of standardization may be challenging, but the CPC is open to examining this proposal and its implementation more closely.

8. Interactions with Government and Members of Parliament

- [68] The Party's designated recipient of classified information is its Director of Operations. This same individual has likely received unclassified security briefings since the 2021 elections.
- [69] Mr. Crase has not had any communications with any Security and Intelligence agencies about FI concerns since the last general election. However, Mr. Crase's understanding is that the Party's Director of Operations interacts regularly with the CCCS, and has advised Mr. Crase that the interactions with and support from the CCCS are useful. Similarly, the Party has not interacted with electoral agencies relating to FI since the last general election, although it does have regular interactions with them with respect to other matters. It has also not had any interactions with police of local jurisdiction with respect to FI matters.
- [70] The Party itself does not provide any guidance to MPs and their staff on what constitutes appropriate and inappropriate interaction with foreign representatives, such as foreign diplomats. Mr. Crase indicated this would be an issue for the House of Commons Administration and/or the Parliamentary Caucus Offices, not party headquarters.
- [71] More generally, the CPC does not currently have any FI-specific procedures to assist MPs or their staff respond against the threats posed by FI, as the Party has not had to face these situations and, if those kinds of issues arose, he expects the House of Commons Administration and/or the Parliamentary Caucus Offices would deal with them.

9. General Recommendations

[72] Mr. Crase indicated that policy recommendations are beyond his role as the Executive Director of the CPC, and that the Party, through its Leader, members of its Parliamentary Caucus, and its policy committee, would be better placed to make recommendations on addressing FI, to the Commission or otherwise.

[73] Given his role is administrative, Mr. Crase declined to express a view on whether the Government of Canada should be doing more to protect political parties and their processes against FI. He did not have suggestions for legislative or regulatory changes that would better protect parties and the political system from FI.