



## NOTICE OF DECISION

[*Immigration and Refugee Protection Act*, subsection 107(1)]  
[*Refugee Protection Division Rules*, rule 67]

Hannah Gray  
Member

In the claim for refugee protection of:	Date of birth:	UCI:
Naushad Ali KHAN	January 10, 1988	1110914604

The claim was heard on May 19, 2021.

The Refugee Protection Division determines that **the claimant is a Convention refugee and therefore accepts the claim.**

The reasons for the decision are attached.

June 24, 2021

A. Luong, Registry Officer  
For the Registrar  
Tel: 1-866-787-7472

**Certified True Copy  
Copie Conforme**

  
IRB Representative  
Représentant de la CISR



RPD File / Dossier de la SPR : VC0-02700

UCI: 1110914604

Private Proceeding / Huis clos

## TRANSCRIPT OF THE REASONS AND DECISION

<b>Claimant(s)</b>	Naushad Ali KHAN	<b>Demandeur(e)(s) d'asile</b>
<b>Date(s) of hearing</b>	May 19, 2021	<b>Date(s) de l'audience</b>
<b>Place of hearing</b>	Heard by Virtual Hearing	<b>Lieu de l'audience</b>
<b>Date of decision and reasons</b>	June 24, 2021	<b>Date de la décision et des motifs</b>
<b>Panel</b>	Hannah Gray	<b>Tribunal</b>
<b>Counsel for the claimant(s)</b>	Massood Joomratty	<b>Conseil(s) du (de la/des) demandeur(e)(s) d'asile</b>
<b>Designated Representative</b>	N/A	<b>Représentant(e) désigné(e)</b>
<b>Counsel for the Minister</b>	<i>Documents only</i>	<b>Conseil du (de la) ministre</b>
<b>Interpreter</b>	Asad Ali Khan	<b>Interprète</b>

**DECISION**

This transcript constitutes the member's written reasons for decision.

5     **MEMBER:** This is an oral dictation of the reasons for the reserved decision for File VC0-02700. The hearing was held on May 19th, 2021.

10    This is the decision of the Refugee and Protection Division; the RPD in the claim of Naushad Ali Khan, the claimant of India, who is claiming refugee protection pursuant to section 96 and subsection 97(1) of the *Immigration and Refugee Protection Act*, the *IRPA*. For this hearing, the Minister's Counsel intervened in writing, which will be addressed in the reasons below.

**DETERMINATION:**

15    I find that the claimant is a convention refugee pursuant to section 96 of the *IRPA* based on his well-founded fear of persecution in India.

**ALLEGATIONS:**

20    The specifics of the claim are stated in the claimant's basis of claim form and narrative in evidence. The claimant is a 34-year-old Muslim man from the Jammu and Kashmir region of India about 10 kilometres from the Pakistan border. He is from the Gurjar Tribe and he is also a musician. The claimant's father was supportive of a separate state Gujjaristan for the nomadic Gurjar and Bakarwal tribes. The claimant's father died in 2016 under suspicious circumstances, and the claimant tried unsuccessfully to investigate his father's death. After his father's death the police raided the claimant's house and questioned the claimant on militant activities and alleged that the claimant was involved in anti-nationalist elements.

30    In November 2017 the claimant was driving in his truck and it was stopped by men from the Gau Raksha Dal also known as the Indian Cow Protection Organization who were also a small branch under the BJP political party in India. They physically assaulted the claimant and accused him of illegally transporting a cow, while the police watched and took no action to protect the claimant. He was in the trucking business and carried a cow in his truck. There are laws around transporting cows, and the owner of the cow must report this to the police before it happens. The area where the claimant lived was more than 90 percent Hindu and they considered cows to be their God.

35    In November 2017 the claimant met the area district magistrate and made an official complaint against the police station house officer; the SHO and deputy superintendent of police. In early January 2018 the police called the claimant and enquired about his activities and warned him that he was under investigation for filing a complaint against them. The police asked him to report to the police station twice between  
40    December 2017 and January 2018 and that they knew about this complaint that he had made to the local district commissioner. They accused the claimant of going against the BJP policies and they threatened him to stop offering his community of Gurjar people food and shelter as his father had done. They threatened to accuse him of being part of a terrorist organization.

45    In late January 2018 the claimant joined a vigil of Muslims from the Gujjar tribe which was in response to the murder of a Gurjar girl who was raped and murdered by Hindus. After this event, in late January 2018 the police arrested the claimant, took him to an undisclosed location and physically assaulted the claimant and accused him of planning militant or anti-nationalist activities. They threatened him with a gun and during this interrogation they kept changing his location. His release was secured once the claimant signed

5 blank documents and provided his fingerprints and photographs, they also required that he withdraw his complaints against the police officers and require that he stop investigating the death of his father or else they, they stated that they would charge or kill him; his release cost his family 80,000 rupees. The claimant planned to flee India after he was released. He feared the police as they used digital technology to trace people throughout India and he knew that his two cousins were arrested in New Delhi and not heard from since.

10 In February 2018 the claimant hired an agent to move him from, to a farmhouse in Andheria Modh, near New Delhi. He lived in hiding between February 2018 and May 2018, in March 2018 the Jammu police and Delhi police raided the house where he was staying in Andheria Modh however, the claimant had just left just before their arrival. After the raid the police visited his residence in Jammu and Kashmir and threatened his family members including his wife and child saying that they would locate the claimant and he could not hide. After the police raid he kept moving locations with the help of agent named Rasoul, the claimant fled to Canada May 2018 at this time the police declared the claimant wanted. His brother remains in hiding up until now.

15 In February 2019 the claimant learned about the refugee process in Canada. The claimant fears being detained, harmed or killed by authorities in India including the police and the Gau Raksha Dal based on being a Muslim man from the Guijar tribe in Jammu and Kashmir region, India who supported his tribe in that region and also transported cattle which was against the strict Hindu laws. He also fears that facing persecution at the hands of society in general, based on his religion as a Muslim

20 **ANALYSIS:**

25 Identity

I am satisfied with the identity of the claimant as a citizen of India which is established by his testimony and the copy of his passport in evidence.

30 Credibility

35 When a claimant swears to the truth of allegations this creates a presumption that those allegations are true unless, there is reason to doubt their truthfulness. I find no reason to doubt the truthfulness of the claimant, the claimant testified in a straightforward forthright detailed and candid manner. There were no material inconsistencies, omissions or contradictions between the claimant's testimony and other evidence in this case that were not reasonably explained. He did not exaggerate or tailor his evidence.

40 In summary, his testimony was consistent with other evidence on central aspects of his claim. I find the claimant provided ample detail to expand upon his allegations. He also provided evidence including his identity documents of being from Jammu and Kashmir, as well as his tribal certificate of being a Guijar, his father's death certificate, a letter on, from the Guijar Desh Charitable Trust on his father's death regarding his father's death, the claimant's medical report, the claimant's online media profile and posts and, country condition evidence.

45 The Minister's Counsel provided evidence in Exhibit 5 which included Facebook posts that the claimant allegedly posted between March 2018 and May 2018 which was social media evidence of the claimant's - - as well as social media evidence of the claimant's friendship with someone named Mohammed Farouk (ph) who works in the Jammu and Kashmir Armed Police Battalion. And reference to research by a liaison for the CBSA that there were no warrants out for the claimant in India.

5 The Minister's Counsel submitted that the claimant alleged in his basis of claim form and on his Schedule A form that he was in hiding from February 2018 to May 2018 however, the claimant's Facebook account for his musician band was created March 6th, 2018. The minister canvassed the claimant's Facebook photographs which show that him performing on stage at multiple shows in early March 2018. When this was put to the claimant he testified that he was in hiding in New Delhi at this time. He testified that his wife Rakshana Kaud (ph) who had remained in Jammu and Kashmir made this Facebook account and posted regularly on it for the claimant's band in order to mislead the Jammu police into thinking that the claimant was still in the Jammu and Kashmir region. He testified that while he put up a few of the posts the majority were posted by his wife.

10 The claimant and his wife posted old photographs of the claimant performing on stage, as well as photographs of the claimant visiting property in Jammu and Kashmir from a previous year. the claimant pointed out that in the some of the photographs in Exhibit 5 there are dates in banners in the background which show that these were old photographs one of which dated 2015 as the year. He also testified that on a few of the posts he stated in the comment section that they were taken in the past. As the claimant's Facebook account is public I was able to view the original posts, I took note of the date on the banner in the background, backdrop of some photographs which did state the year as 2015 and not 2018. These photographs were posted on Facebook on March 9th, 2018, the same posts states, "A memorable, memorable moment, this too." I also noted the claimant's comment on another post from March 9th, 2018, states, "NASH Day Punjabi Program A, 2016 key photo ... all the photos in front of you today which are a memorable one for me going to show off." I accept the claimant's explanation as reasonable and I find that this evidence corroborates the claimant's allegations that these photographs were not of live shows.

15 Based on the evidence before me and the clear and consistent testimony, I accept on a balance of probabilities that the claimant was posting old photographs and I accept on a balance of probabilities that he was indeed hiding between March and May 2018. I also note that the claimant's Facebook account was created in March 6th, on March 6th, 2018, and that this Facebook page had not had any new posts since May 2018 which is the timeframe he alleged he was in hiding. On the date the page was created; March 20 6th, 2018, there five posts which show the claimant dressed in different clothing and what appeared to be at different events. On March 8th, 2018, there were six posts made which again, appear to be from different events. This also corroborates the claimant's allegations that the photographs posted on this Facebook page were from past events and not events that occurred live in 2018 between March and May.

25 Based on the evidence before me and the claimant's credible testimony, I accept on a balance of probabilities that the claimant's explanation in his testimony, it's reasonable. And this account was created so that the claimant could evade the agent of harm in India.

30 The Minister's submitted that the claimant continued to post photographs to his Facebook in April and May 2018 with comments such as, "At my paternal countryside." "Ready for outing." When put to the claimant he explained that these photographs were also from the past and they were also posted in order to evade the agent of harm. When I observed the photos I took note that the photographs provided by the CBSA officer in 2018 displayed the claimant with very little hair on top of his head while in this photograph of his Facebook page posted on May 13th, 2018, which states, "Ready for outing." The claimant appears to have 45 much more hair on his head which leads me to believe that this is an old photograph.

I find the claimant's explanation reasonable and therefore, I accept on a balance of probabilities that the photographs that he or his wife posted on this Facebook page were taken prior to 2018 and that the claimant was not located in the Jammu and Kashmir region between March and May 2018. For, furthermore, the

5 minister submitted that one of the claimant's Facebook friends Mohammed Farouk who commented on one of the claimant's photographs in Exhibit 5, has a Facebook profile that references his job at the J&K Police, the same organization of police that the claimant allegedly fears. When put to the claimant he testified that Mohammed Farouk attended school with the claimant and they played cricket together and had been friends for many years. The claimant testified that his Mohammed Farouk works for the Jammu and Kashmir Armed Police Battalion in Kashmir which is different than the police who work at the police station in Jammu and Kashmir who accosted him, pursued the claimant.

10 The claimant testified that Mohammed Farouk is aware of the claimant experiences with the Jammu police and he advised the claimant to leave India, as the police would continue to pursue the claimant. Based on the claimant's forthright testimony I accept this explanation as reasonable and I do not draw a negative inference towards the claimant's credibility or subjective fear based on his friendship with Mohammed Farouk.

15 Finally, the minister submitted that the CBSA liaison officer in India did not find any warrant for the claimant in India and therefore, the minister submits that the claimant fabricated his basis of claim. When put to the claimant, he testified that while the police did threaten, detain, and physically assault him, they did not officially charge the claimant with a crime, nor did they make a formal arrest. The claimant testified that while he was being detained in January 2018 the police took his photograph, fingerprints and had him sign a blank paper in order to be released. The claimant did not allege in his BOC, testimony, Schedule A or Schedule 12 forms that there was a warrant for his arrest however, he did state that the police wanted him. Therefore, I accept his explanation as reasonable and I do not draw a negative inference of the claimant's allegations, based on there being no arrest warrant for him in India.

25 The claimant was questioned on why he delayed filing for refugee protection in Canada, as he arrived in Canada in May 2018 and made his claim for refugee protection in February 2019. The claimant testified that he did not know anyone in Canada when he arrived and that therefore, he did not know the refugee claim process. He testified that he met a Sikh Indian man in a park in Surrey, British Columbia who informed the claimant that he should apply for refugee protection and that to do so he needed to travel to Montréal, Quebec. The claimant followed the advice of the Sikh man and travelled to Montréal, Quebec to make his claim in February 2019. The claimant later transferred his case back to British Columbia, as that was the location of his job.

35 Based on the evidence before me including documentation that the claimant's file was transferred to Montréal, to Vancouver and his addresses listed in evidence which show that he lived in British Columbia then Quebec, then British Columbia again, I accept that the claimant was misinformed that he must make his claim in Montréal, Quebec. Based on the presumption of truthfulness, the claimant's consistent testimony and the corroborating evidence, I find the claimant's allegations to be credible.

40 **WELL-FOUNDED FEAR OF PERSECUTION AND RISK OF HARM:**

45 In order to be found a convention refugee under section 96 of the *IRPA* the claimant must show that he has a well-founded fear of persecution by reason of race, religion, nationality, membership in a political social group or political opinion. I find that the claimant has a well-founded fear of persecution based on his imputed political opinion as he was associated to his father who stood for Gujjaristan which aimed to create an independent state for the Gujjar people. I also find the claimant has a well-founded fear of persecution based on his religion has a Muslim man from the Jammu and Kashmir region, as an ethnic Gujjar. I find that the claimant's allegations form multiple nexuses to the convention in the form of imputed political

opinion, religion and ethnicity.

5 The claimant testified that his problems first began when he began, when he investigated the suspicious death of his father in June 2016. His father was a Muslim Gujar man from Jammu and Kashmir who provided aid and services to the Gujar people and stood for a separate state. When the claimant tried to investigate his father's death he was threatened by the police and people from the BJP Party and the claimant was accused of being anti-nationalist.

10 In November 2017 the claimant was stopped and physically assaulted by the Gau Raksha Dal the cow protector's organization while he was transporting cattle in his truck. The Gau Raksha Dal assailants were formed by members of the Bharatiya Janata or the BJP Party which is the current ruling political party of India and its policy has historically reflected Hindu nationalist positions. During this assault on the claimant the police were present and did not intervene. According to NDP 12.1 the US Department of State on India International Religious Freedom Report states that 24 of the 28 states apply partial to full restrictions on bovine slaughter. Penalties vary among state and they vary based on whether the animal is a cat, calf, bull or ox. The ban mostly affects Muslims and members of scheduled casts and scheduled tribes. In the majority of the states where bovine slaughter is banned punishments include imprisonment for six months to two years and a fine of 1,000 to 10,000 rupees. Rajasthan, Punjab, Haryana, Himachal Pradesh and Jammu and Kashmir penalize cow slaughter with imprisonment of 2 to 10 years. The law in Gujarat mandates a minimum of a 10 year sentence the punishment for some counts from manslaughter. And a maximum sentence of life imprisonment which is the punishment for premeditated murder of humans for killing cows, selling beef and illegally transporting cows or beef.

25 The Human Rights Watch Report at NDP Item 12.7 states that, cow protection groups often occupy these posts alongside the police. A head constable in charge of one such police check post on highway in Alar told Human Rights Watch they face,

30 A lot of pressure from the Gau Raksha to ensure we don't let any cow smugglers past. Sometimes it's days before we go home. Each one of these check posts has six police constables and residents allege these have become extortion points where transporters are forced to pay bribes. Those involved in attacks on alleged cow smugglers often boast that they not only have political protection, but enjoy public support. Some of them have expressed a desire to contest seats than local or national elections. One of them accused in the attack at, a Mohammed Aklouk (ph) discussed below, has backing from Hindu Nationalist Political Party.

35 In January 2018 the claimant was detained and again, physically assaulted and accused of being a terrorist by police after attending a vigil for the death of a Gujar Muslim girl who was raped and murdered by Hindu extremists. Country condition document established that India has a worsening human rights situation for people of the Islamic faith. I have looked at a number of documents in evidence; in Exhibit 3 Item 12.1 the US Department of State International Religious Freedom Report tells us that the constitution of India mandates a secular state and provides for freedom of conscious and religion however, in practice 9 of the 28 states have lost restricting conversions and there are serious issues of religiously inspired mob violence, lynching and communal violence that are sometimes denied or are ignored by lawmakers. For example, there are reports by NGO's that the government failed to act to prevent or stop mob attacks on religious minorities, marginalized communities and those, and critics of the government.

45 NDP Item 1.4 Australia Hindu Nationalists increase on attacks minorities states that Muslims experience communal violence. Some officials in the Hindu majority parties including from the BJP have made inflammatory public remarks or social media posts against minority communities leading to mob attacks

by violent Hindu groups. For example, Muslims have been targeted because of rumours that they are involved in the trading or killing of cows for beef. This is cow vigilantism and it's, as it's called has manifested as intimidation mob violence and murder. The authorities had been protecting the perpetrators of these acts of prosecution and even filing charges against the victims.

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Tab 12.15 of the NDP is recent, has a recently made IRB compilation of a number of human rights reports on the situation of Muslims. Among other things, it tells us that there about 172 Muslim, million Muslims in the country or 14 percent of the population. Muslims appear to have been subject to discriminatory practices that has restricted their access to a number of services and opportunities for example, rental housing, education and healthcare. According to NDP 12.15 there's a new citizenship law which is meant to increase citizenship access to people of a Hindu background and it has been widely perceived as being discriminatory against Muslims. This has resulted in a number of protests in the year 2020 and then counter protests following the strongly worded speech by a BJP politician, the resulting conflicts intensified to violence. Reports that mobs were for example, forcing men to show their genitals to see if they had the circumcision that Muslim people are believed to have. There were shootings, beatings, the defacing of mosques well over 200 people injured in total. Police forces did not stop these riots in fact, they appeared to have joined the violence against Muslims for example, a group of police were caught on tape beating men after they were knocked to the street forcing them to sing the Indian National Anthem.

Based on the claimant's political, as well as the threats, sorry, political opinion, as well as the threat and harm committed against him and his family and the conditions in India for religious minorities in general, I find that there is a serious possibility of persecution if the claimant returns to India.

#### STATE PROTECTION:

In all refugee claims the state is presumed to be capable of protecting their citizens unless there's clear and convincing evidence to the contrary. In this case, I find that the claimant has rebutted the presumption of state protection as the claimant was targeted, detained, physically assaulted, and threatened by the police. According to the Commonwealth Human Rights Initiative Muslim voices perceptions of police in India at NDP Item 10.7,

Anti-Muslim bias in the police has been consistently documented over the course of the independent India's history mainly, by judicial commissions forced in the aftermath of incidents of Hindu-Muslim communal violence.

According to Human Rights Watch, while those involved in violent attacks often imply that they enjoy political patronage in two cases investigated by Human Rights Watch detailed below, the assailants had the open backing of elected lawmakers who offered legal assistance in other cases, police have compromised and performing the duty because of political pressure. Said Rich Pal (ph) Singh, a former additional superintendent of police in Rajasthan (ph) police face political pressure to sympathize with cow protectors and do a week investigation and let them go free this is happening wherever BJP government is in power, these vigilantes get political shelter and help.

Based on the circumstances of this claim, I find the claimant is at risk of harm for communal violence, as well as persecution by police based on his political opinion as a Gujjar man and as a Muslim. According to NDP Item 12.15 there is objective evidence to suggest that the police do not adequately protect religious minorities from mob violence and they even participate in it. As a Muslim man from the Gujjar tribe of Jammu and Kashmir region there is a risk that the claimant faces further mistreatment or abuse by the police.



5 Due to his profile, as a Gujjar Muslim man and someone who has previously come to the attention of police on multiple occasions due to his political actions and support of his Gujjar community, investigation of the death of his father and attendance of an Islamic vigil and protest, I find on a balance of probabilities that the state will not afford the claimant adequate protection. As a result, I find that the claimant has rebutted the presumption of state protection.

**INTERNAL FLIGHT ALTERNATIVE or IFA:**

10 For a viable IFA to exist two things must be the case; first, the claimant must not face a serious possibility of persecution or on a balance of probabilities a danger of torture, a risk to life or a cruel and unusual punishment in the proposed IFA location. Second, it must not be objectively unreasonable in all the circumstances for him to seek refuge there. Once an IFA has been proposed the onus is on the claimant to establish that the proposed IFA is not viable. The standard of objective unreasonableness for a proposed  
15 IFA is high and requires proof of adverse conditions which would jeopardize the life and safety of the claimant in traveling to and, to and in living in the proposed IFA locations.

20 At the onset of the hearing I proposed Mumbai, Kolkata and Chennai as viable IFA's. I find that the claimant could not relocate to Mumbai, Kolkata or Chennai as he has established that he would face a serious possibility of persecution in the IFA locations. There is sufficient evidence to demonstrate that the agents of harm who threaten the claimant in Jammu and Kashmir and while he was hiding in New Delhi would also be motivated and capable of tracking the claimant to Mumbai, Kolkata and Chennai. Even if they were not able to locate him in those cities the claimant would face a serious possibility of persecution in those IFA locations, based on his religion and his ethnicity as a Muslim Gujjar from Jammu and Kashmir.

25 If there are serious possibility that the claimant would be at risk in the IFA -- Mumbai is a large diverse city of 18.4 million people located over 1600 kms from the claimant's former place of residence: Jammu and Kashmir, India. The claimant testified that if he were to relocate to Mumbai the agents of harm would be able to locate him as the police and authorities and the BJP members are able to track high profile citizens and they were able to track him when he relocated to New Delhi in 2018. According to NDP 10.6 the CCTNS is a data base with information on crime and criminals that interconnects police stations across the country, the CCTNS aim to creating a nationwide network infrastructure for the investigation of crime and detection of criminals. Additional information indicates that the connectivity has enabled at 13,439 out of 15,398 police stations in India and that 35 of the 36 states and union territories are sharing the CCTNS  
30 database which contains 70 million records including 25 million FIR'S. the claimant testified that he would have to register his name and identification documents with a landlord if he were to relocate to Mumbai or another city in India and therefore, he could be located by the agents of harm.

35 Country condition evidence confirms that in Mumbai tenants typically register with their landlord and tenant verification form is filled out with information of the owner and the tenant, attached to a copy of the registered lien and license agreement and submitted to the police station. This establishes that the agents of harm would have the means to locate the claimant if he were to locate to Mumbai. Therefore, I find that the claimant could not safely register as a tenant in Mumbai without being located by the agents of harm. The claimant testified that due to his profile as a Muslim man of the Gujjar tribe from the Jammu and  
40 Kashmir region whose father was involved with the Gujjaristan movement for a free state for the Gujjar people, he is perceived as being anti-national and opposing the ruling BJP political party and the state authorities, and the state authorities and therefore, he faces a serious possibility of persecution throughout India.

5 Based on the aforementioned information and the claimant's testimony that he was located and physically assaulted by members of the Gau Raksha Dal of the BJP party and police in more than one location, I find that the agents of harm have the motivation and means to locate the claimant in Mumbai or Kolkata and Chennai. In addition, the claimant fears the police who are agents of the state. I also find that it is unreasonable for the claimant to relocate to one of the suggestion IFA locations due to his profile as a Muslim man from the Gujjar tribe. According to NDP 12.1 the NGO Human Rights Watch stated that through 2019 Hindu groups characterize as extremists, some of which according to Human Rights Watch had links with BJP supporters, continued to perpetrate mob violence against minorities especially Muslims amid rumours that they trade or kill cows for beef.

10 NDP Item 12.15 state that, "Sources note that Muslims encounters societal and economic marginalization," According to the US Department of State country report on human rights practices for 2019, "Muslims are among the most vulnerable groups in relation to societal violence based on religion and cast." Similarly, a report by the Centre for Study of Society and Secularism the CSSS, a minority rights group MRG indicates that Muslims continue to be disproportionately affected by communal violence. The NDP Item 12.15 states that in a report on the cow protection movement Human Rights Watch writes that,


20 The alleged assailants in cases of violence regarding cows documented by the organization were members of local cattle protection committees affiliated with Hindu extremists group often with links to the ruling party. The same source adds that BJP officials have largely failed to condemn attacks on Muslims. Their policies and statements appear to have encouraged abuses by cow protection groups who believe they are politically protected from being held accountable.

25 According to previously reported NDP Item 12.15 shows that the internal migration possibilities are limited in India due to a number of factors such as a lack of documentation, failure -- oh, familiar or community networks, financial resources and opportunities and ethnic and religious discrimination as it, as such is in the case of the claimant. Based on the objective evidence before me, I find on a balance of probabilities the claimant faces a serious possibility of persecution throughout India without recourse to effective state protection or a safe and viable internal flight alternative.

30 I therefore, find that the claimant is a refugee pursuant to section 96 of the *IRPA* based on his well founded fear of persecution in India and his claim has been accepted.

35 ----- REASONS CONCLUDED -----

40 I, *Caroline Williams*, declare that this transcript is accurate  
*June 13, 2021*

45   
Caroline Williams  
Transcriptionist

I, Laura Rowsell, certify that I have checked the accuracy of this document and find it to be a true copy of the digital recording provided in this matter.

*Rowsell*

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Laura Rowsell  
Quality Assurance Manager

(signed)

**Hannah Gray**

**Hannah Gray**

**June 24, 2021**

**Date**

**Certified True Copy  
Copie Conforme**

*Hannah Gray*

**IRB Representative  
Représentant de la CISR**