GLENN BLACKETT LAW
Barrister

August 5, 2025

City of Abbotsford
32315 South Fraser Way
Abbotsford, BC
V2T 1W7

Via Email: [redacted]

Attention: Mayor, Ross Siemens
Council Members
General Manager, Legal and Legislative Services, Ken Leung
City Manager, Peter Sparanese
Director, Legislative Services, Robin Charl
General Manager, Engineering and Regional Utilities, Nathan Koning
General Manager, Parks, Recreation, and Culture, Todd Stewardson

Abbotsford Fire Rescue Service
Fire Hall # 1, 32270 George Ferguson Way,
Abbotsford, BC
V2T 2L1

Attention: Fire Chief, Erick Peterson

Abbotsford Police Department
2838 Justice Way
Abbotsford, BC
V2T 3P5

Attention, Chief Constable, Colin Watson

Dear Sirs/Mesdames:

Re: Let Us Worship Revive in '25 Abbotsford

I have been retained by [redacted] (the "**Society**") in connection with a worship event ("Let Us Worship Revive in '25 Abbotsford") scheduled to take place on August 24, 2025, at Mill Lake Park in Abbotsford, British Columbia (the "**Event**").

The Society is in receipt of Mr. Sparanese's letter of July 29, 2025 (attached as Schedule "A") denying a permit (the "**Denial**") requested under the city's *Outdoor Special Event, Filming & Activities Bylaw* (the "**Bylaw**"). The Denial came after opinions were obtained from Mr. Koning, Mr. Stewardson, Chief Peterson, and Chief Constable Watson.

The City rests its Denial on the likelihood of "significant numbers of protestors and counter-protesters." My client advises that protests on the "Let Us Worship" tour have been small or non-existent, peaceful, and generally law abiding. The Denial, therefore, seems to rest on a fundamental factual error. My client has been provided no evidence of these safety risks from the City but looks forward to receiving and reviewing it.

[redacted] [redacted]

The City maintains it has insufficient first-responder capacity to permit the peaceful exercise of fundamental constitutional freedoms. Chief Peterson and Chief Constable Watson claim an inability to control, by any reasonable means, what seem to be, at worst, moderate safety risks.

Either the City:

1. is functionally incapacitated, in which case my client fails to see why the burden of such failure should fall on its shoulders or necessitate cancellation. Until the City is able to restore necessary first-responder capacity it should do everything in its power to facilitate the Event, at its own expense; or

2. is not incapacitated, in which case the Denial comes to resemble simple participation in unconstitutional and illegal cancel culture. If so, that is an abuse of statutory power[1]:

   "Discretion" necessarily implies good faith in discharging public duty; there is always a perspective within which a statute is intended to operate; and any clear departure from its lines or objects is just as objectionable as fraud or corruption.[2]

Should litigation be necessary, the strength of the City's evidence and opinions will be carefully scrutinized. I request that **each recipient of this letter immediately preserve all records relating to this Event, including the records requested below**.

My client would much prefer the Event simply proceed and the City distance itself from cancel culture.

I request, therefore, that Mr. Sparanese withdraw the Denial and work reasonably with my client to "pla[n] … and accommodat[e]," as is his primary objective under the Bylaw.

Reconsideration

In the alternative, this is a request for reconsideration of the Denial by Council pursuant to Bylaw s. 14.1. The *Appeal Procedure Bylaw, 2016* referenced in that section appears to have been repealed and replaced with *Appeal Procedure Bylaw, 2023*. That appeal procedure is woefully inadequate to the present circumstances as it contemplates a hearing no sooner than October 2025, which comes far too late for the Event, which should reasonably be confirmed no later than about August 8, 2025, in order to proceed.

Once we are provided with a copy of the information requested in this letter and the relevant appeal bylaw we will make further submissions with respect to the reconsideration and will provide evidence in support.

A notice of appeal in the form required by the appeal bylaw will be provided in due course.

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[1] *Police Act*, RSBC 1996, c 367; *Fire Safety Act*, SBC 2016 c 19; *Community Charter*, SBC 2003, c 26; Fire *Service Bylaw, 2020*, No. 3055-2020 (Abbotsford).
[2] *Roncarelli v Duplessis*, [1959] SCR 121.

[redacted] [redacted]

This is a request to City Council, pursuant to its powers under s. 5 of the appeal bylaw, to order that the addressees of this letter deliver **a copy of the records and information requested no later than Wednesday August 6, 2025.**

Given the procedural delay which the appeal bylaw necessitates, my client requests that the City offer some means by which evidence is provided, and submissions and a decision be made by August 8, 2025, including variations of procedures and timelines under s. 5. My client cannot know what evidence is required without knowledge of the evidence relied upon by Mr. Sparanese, Chief Peterson, and Chief Constable Watson in their opinions or the mitigation options considered and dismissed.

In the alternative, Mr. Sparanese's office could simply re-file the original application and all materials provided to date as a new application and, himself, properly consider the application in light of the full evidence and submissions.

Background

Sean Feucht is a Christian musician, speaker, author, missionary and artist. He is the founder of several global movements including "Light a Candle" and "Let us Worship.". "Light a Candle" describes itself as a global mission to bring light, hope, healing, and love to places in need, and "Let Us Worship" is a movement that brings together believers to worship and pray.

Sean Feucht offers bookings to speak at events, perform musical concerts, lead worship, preach and host one of his global movements. Mr. Feucht has performed and hosted events across the United States and in Canada.

On or about June 19, 2025, Mr. Feucht announced his plans to host the "Let us Worship" tour across Canada.[3] The tour is described as a "summer of revival" that carries a message of "healing to a nation" and "Our heart is to bring Worship and Gospel to the parks and streets of every city we visit".[4] The Event brings together local churches, ministries and communities in Christ, and was scheduled to take place in certain cities across Eastern Canada until July 27, 2025, and across Western Canada from August 20-24, 2025.[5]

The Event anchors a multi-day community outreach event involving many members of the Abbotsford community. The Denial, therefore, effects a denial to hundreds or thousands of your community members to peacefully assemble for the purpose of expression and collective religious worship.

Fundraising efforts for these events allow people to attend free of charge.

Application

On April 28, 2025, the Society submitted a permit application under the Bylaw. The objective of the bylaw is to plan and accommodate special events and to mitigate adverse impacts.

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[3] https://www.instagram.com/p/DAmtmfZvUCS/?utm_
[4] https://www.[redacted]com/let-us-worship-canada
[5] *Ibid.*

[redacted]

Since April 28, 2025, the Society has been working in good faith to provide all information and supporting documentation Mr. Sparanese's office deemed necessary and advisable, which did not include written statements contemplated under Bylaw s. 4.3(i) ("**Safety Letters**"). Attached as Schedule "B" is the Event Organizer Permit Requirement Checklist provided in May to the Society by Mr. Sparanese. Contrary to the letter, Safety Letters are not required unless specifically requested.

Political and Religious Cancellations

As I suspect the evidence will demonstrate you are all aware, the City of Abbotsford is the latest of several governments to cancel the Society's "Let Us Worship" tour across Canada. Many of those cancellations were nakedly political, many occurred in the context of public attacks on the Christian content of the tour, and almost all sheltered under claims of community "safety."

Refusal

My client was given no notice that Mr. Sparanese had changed the application requirements and required Safety Letters.

My client understands that City Council met to review the Society's application for the Event. My client received no notice of that meeting or participatory rights in it. **Please advise if any of Mayor or City Council members communicated with one another or Mr. Sparanese with respect to the Event and, if so, please provide a copy of such communications including any agenda, materials, minutes and transcripts or video recording.**

The letter indicates the Event will "likely attract significant numbers of protesters and counter-protesters." No such information was shared with the Society and this information contradicts our client's information. **Please provide all records and information in the possession of Mr. Sparanese, Mr. Koning, Mr. Stewardson, Chief Peterson and Chief Constable Watson with respect to protests and counter-protests.**

The letter suggests each of Mr. Koning, Mr. Stewardson, Chief Peterson and Chief Constable Watson were contacted by Mr. Sparanese and gave opinions that:

- there were serious safety risks for the Event;
- such risks were extremely difficult to mitigate; and
- no permit conditions could adequately address such risks.

Our client was not provided with the information relied upon for these opinions, is not aware of what mitigation options were considered, is not aware of the reasoning as to why mitigation options were unworkable, and was not granted notice of these communications nor participatory rights. **Please provide all records of information relied upon, mitigation options that were considered, and all communications between such officials and Mr. Sparanese.**

I note Chief Constable Watson, who was apparently aware of such significant risks to the health and safety of the Society's volunteers and guests that they were beyond his department's ability

[redacted] [redacted]

to control, entirely failed to warn the Society of these risks. As my client may need to secure an alternate venue in the vicinity, **it is necessary that information be shared immediately.**

Mitigation

My client remains willing to work with the addressees to reasonably address *bona fide* safety concerns including:

- information as to safety risks and interactions with protesters at prior events during this tour;
- mitigation options;
- ticketing;
- ticket fees; and
- fencing.

However, given the negligible[6] or non-existent safety concerns reported by my client during previous events, the proposition that safety risks are so serious as to defy mitigation appears completely unwarranted. My client advises that, as one would expect in Canada, protesters thus far have been peaceful and almost entirely law abiding and that a modest police presence during the tour has been more than enough.

The *Charter* Guarantees Freedom of Religion and Expression

The *Canadian Charter of Rights and Freedoms* guarantees Canadians the fundamental freedoms of conscience and religion and expression (ss. 2(a) and (b)). Freedom of religion under s. 2(a) of the *Charter* was defined by the Supreme Court of Canada in the seminal case of *R. v. Big M Drug Mart Ltd.*, [1985] 1 S.C.R. 295 at pp. 336-37:

> *The essence of the concept of freedom of religion is the right to entertain such religious beliefs as a person chooses, the right to declare religious beliefs openly and without fear of hindrance or reprisal, and the right to manifest religious belief by worship and practice or by teaching and dissemination.*

The tour includes Mr. Feucht, volunteers, and guests manifesting religious belief by worship, teaching and dissemination. The Denial objectively interferes with all such collective and individual religious activity.

The *Charter* protects Canadians' right to listen to performers of their choice. The Supreme Court of Canada has stated:

> *Freedom of expression protects not only the individual who speaks the message, but also the recipient.… the* Charter *protects listeners as well as speakers …* [7]

[6] The most serious safety incident was a gender-reveal-type "smoke bomb" activated in a church, which neither interrupted the event nor attracted any police response.
[7] *Harper v. Canada (Attorney General)*, 2004 SCC 33 at para 17.

[redacted] [redacted]

Mr. Feucht's songs and lyrics are protected by freedom of expression under section 2(b) of the *Charter*. They clearly have expressive content, Mill Lake Park is a place designed for public expression, and a decision to deny his permit to perform at Mill Lake Park for political reasons would violate the protection for expression under section 2(b).[8] In *Greater Vancouver*, the Supreme Court of Canada found that a ban on political and advocacy advertising on city transit violated freedom of expression under *Charter* section 2(b) and was not justified.

In another Supreme Court of Canada decision, *Loyola High School v. Quebec (Attorney General)*, 2015 SCC 12, at para. 43, Justice Abella stated:

> *The pursuit of secular values means respecting the right to hold and manifest different religious beliefs. A secular state respects religious differences, it does not seek to extinguish them.*

In *Mouvement laïque québécois v. Saguenay (City)*, 2015 SCC 16, the Supreme Court of Canada described the state's duty of religious neutrality. The Court stated that the rights and freedoms set out in the *Charter* "reflect the pursuit of an ideal: a free and democratic society. This pursuit requires the state to encourage everyone to participate freely in public life regardless of their beliefs": *Saguenay*, at paras. 75-76. The Court continued:

> *The state may not act in such a way as to create a preferential public space that favours certain religious groups and is hostile to others. It follows that the state may not, by expressing its own religious preference, promote the participation of believers to the exclusion of non-believers or vice versa.*
>
> *When all is said and done, the state's duty to protect every person's freedom of conscience and religion means that it may not use its powers in such a way as to promote the participation of certain believers or non-believers in public life to the detriment of others.*

Government cannot exclude "believers" from participation in public life any more than it can exclude "non-believers". Prohibiting religious expressions from public spaces violates the government's duty of religious neutrality.

Mill Lake Park is a public venue which serves many diverse groups with widely varying purposes and beliefs. It is regularly used for events and concerts. Further, Abbotsford has hosted ideological and religious events in its public venues. For example, the Abbotsford Arts Centre held a Youth Pride Dance on July 25, 2025, and Cadet Hall Exhibition Park held the Abbotsford Islamic Centre's Prayers for Eid al-Adha. As such, it serves the requirement that the state "encourage everyone to participate freely in public life regardless of their beliefs". To deny certain groups such as the Society from accessing Mill Lake Park would be contrary to this requirement on the basis of the expression of belief, violating both sections 2(a) and 2(b) of the *Charter*.

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[8] See *Greater Vancouver Transportation Authority v Canadian Federation of Students -British Columbia Component*, 2009 SCC 31, at para. 37, citing *Montreal (City) V. 2952-1366 Quebec Inc.*, 2005 SCC 62, at para. 56.

[redacted] [redacted]

In our diverse, multicultural, free and democratic society, it is not the state's duty to ensure that everyone agrees with the views and beliefs expressed by others in a public space. Rather, it is the state's duty to ensure that everyone has the right to express their views and beliefs in the public square.

Preliminary Submissions

Charter rights were:

- engaged when considering the application including communications with, and the opinions of, Mr. Koning, Mr. Stewardson, Chief Peterson and Chief Constable Watson; and

- infringed by the Denial,

including:

- The Society's, Mr. Feucht's and attendees' s. 2(a) individual and/or collective[9] rights to manifest religious belief by collective worship, practice, teaching, and dissemination.

- The Society's, Mr. Feucht's and attendees' s. 2(a) rights to a religiously neutral public space. Even if the City did not intend to target the Event for its Christian content, it was well aware of the anti-Christian cancel culture campaign that has plagued the tour across Canada. It was, therefore, well aware that the public might reasonably perceive the Denial as an expression of religious hostility.

- The Society's, Mr. Feucht's and attendees' s. 2(b) freedoms of expression (to both speak and listen).

- The Society's, Mr. Feucht's and attendees' s. 2(c) freedom of assembly.

Charter rights may reasonably be limited where, *inter alia*, demonstrably justified in a free and democratic society[10] in accordance (in the present circumstances) with the test set out in *Doré c Québec (Tribunal des professions)*, 2012 SCC 12.

However, in Mr. Sparanese's reasons (provided in accordance with Bylaw s. 13.2) he totally fails to recognize that a *Charter* right applies and therefore provides no analysis of that right. This is a fatal[11] failure of the City to uphold *Charter* rights.

That the City failed to even consider, much less robustly weigh, its constitutional obligations against competing statutory objectives is alarming and, I would submit, revealing.

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[9] *Hutterian Brethren of Wilson Colony v. Alberta*, 2009 SCC 37 at para. 131.
[10] *Charter* at s. 1.
[11] *York Region District School Board v Elementary Teachers' Federation of Ontario*, 2024 SCC 22 at paras. 68 and 94.

[redacted] [redacted]

The City's potential s. 1 justification is further compromised by the manifest unreasonableness of its decision-making process including, primarily, its failure to ensure the barest rights of *audi alteram partem*[12] to the Society:

- It failed to advise of new permit conditions (Safety Letters);
- It relied on improper information[13] and failed to permit information or submissions from the Society as to likely safety risks;
- It failed to advise the Society that it would contact Mr. Koning, Mr. Stewardson, Chief Peterson and Chief Constable Watson, failed to provide to the Society information provided to or received from those officials, and failed to grant the Society participatory rights in those communications – Bylaw s. 8.3(i) contemplates the applicant approaching these officials.
- It relied on improper information and failed to entertain information or submissions from the Society as to potential mitigation options, including its improper intervention into communications with the above officials.

Based on the evidence known to the Society, and Mr. Sparanese's marked failure to inform or hear submissions from the Society on these matters, the conclusion that "no permit conditions could adequately address the potential risks to the public" appears baseless. Subject to what may be revealed in the records request above, my client submits the Denial demonstrates an invalidating reasonable apprehension of bias.[14]

City Council also has no jurisdiction under the Bylaw to refuse an application and Mr. Sparanese has no authority to subdelegate decision-making power to City Council. If City Council was the practical decision maker, the decision is *ultra vires* and void.[15]

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[12] *Kane v. University of British Columbia*, [1980] 1 S.C.R. 1105; *New Brunswick (Registrar of Motor Vehicles) v. Maxwell*, 2016 NBCA 37; *Saskatchewan (Employment Standards) v. North Park Enterprises Inc.*, 2019 SKCA 69; *Mental Health and Addiction Services v. S.B.*, 2021 SKCA 18; *Toronto Transit Commission v. Amalgamated Transit Union*, 2020 ONSC 1008; *Gouniavyi v. Yukon (Government of)*, 2019 YKSC 40.

[13] *S.E.I.U., Local 333 v. Nipawin District Staff Nurses Assn.*, [1975] 1 S.C.R. 382; *R. v. Alberta (Labour Relations Board)*, (1983) 4 Admin. L.R. 89 (Alta. Q.B.); *Tran v. Canada (Minister of Citizenship & Immigration)*, 2012 CarswellNat 443 (F.C.); *S. (R.) v. Canada (Minister of Citizenship & Immigration)*, 2012 CarswellNat 2287 (F.C.).

[14] *Syndicat des employés de production du Québec & de l'Acadie v. Canada (Human Rights Commission)*, [1989] 2 S.C.R. 879; *Old St. Boniface Residents Assn. Inc. v. Winnipeg (City)*, [1990] 3 S.C.R. 1170; *Newfoundland Telephone Co. v. Newfoundland (Board of Commissioners of Public Utilities)*, [1992] 1 S.C.R. 623; *Baker v. Canada (Minister of Citizenship & Immigration)*, [1999] 2 S.C.R. 817; *Boardwalk Reit LLP v. Edmonton (City)*, (2008) 75 Admin. L.R. (4th) 19 (Alta. C.A.); reconsideration refused, 2008 CarswellAlta 1084 (Alta. C.A.); leave to appeal refused, 2008 CarswellAlta 2026 (S.C.C.); *Merchant v. Law Society (Alberta)*, (2008) 86 Admin. L.R. (4th) 116 (Alta. C.A.); leave to appeal refused, 2009 CarswellAlta 573 (S.C.C.); *St. John's (City) v. Seanic Canada Inc.*, 2016 CarswellNfld 323 (N.L. C.A.) *Richmond (City), Re*, 2021 CarswellBC 3966 (B.C. Utilities Comm.)

[15] *Reference re Regulations (Chemical) under War Measures Act (Canada)*, [1943] S.C.R. 1; *Fort Frances Pulp & Paper Co. v. Manitoba Free Press Co.*, [1923] 3 D.L.R. 629 (Ontario P.C.); *Canada (Attorney General) v. Brent*, [1955] 3 D.L.R. 587 (Ont. C.A.); affirmed, [1956] S.C.R. 318; *Brant Dairy Co. v. Ontario (Milk Commission)*, [1973] S.C.R. 131; *Canadian Institute of Public Real Estate Cos. v. Toronto (City)*, [1979] 2 S.C.R. 2; *Lal, Re*, 13 B.C.R. 415 (B.C. S.C.); *Geraghty v. Porter*, [1917] N.Z.L.R. 554; *Gateway Bible Baptist Church et al. v. Manitoba et al.*, 2021 MBQB 218; affirmed, 2023 MBCA 56; leave

[redacted] [redacted]

Conclusion

The Society remains unaware of the safety risks apparently known to the City. Given the size and peaceful nature of the protests to date (small or non-existent and peaceful) the City's perception of safety risks appears to be wholly overblown.

We would therefore request that Mr. Sparanese or City Council grant the permit, subject to any minor pending permit conditions (parking and washrooms).

If the City has remaining safety concerns they are either:

- legitimate, in which case the Society will continue to work with the City to reasonably address such concerns once information is provided; or

- pretence and, therefore, bad faith, which will increase the addressees' potential legal exposure.

On behalf of our client, I encourage the City to distance itself from the Canada-wide series of political cancellations and set itself apart as a municipality which facilitates the exercise of constitutional freedoms.

Sincerely,

[redacted]

For: Glenn Blackett
Barrister

to appeal refused, 2024 CarswellMan 91 (S.C.C.).

[redacted]

[redacted]

Schedule "A"

July 29, 2025

BY EMAIL

[redacted]

Dear Sirs/Mesdames:

RE: Special Event Permit Application

I am writing regarding your application to the City of Abbotsford (the "City") for a Special Event Permit that was submitted on April 28, 2025, for an event proposed for August 24, 2025 at Mill Lake Park (the "Proposed Event").

Pursuant to section 13.2(b) of the City's *Outdoor Special Event, Filming & Activities Bylaw* (the "*Bylaw*"), I will not issue a Special Event Permit for the Proposed Event.

Section 4.3(i) of the *Bylaw* requires, among other things, that an application must include written statements from the following four City officials confirming that they are satisfied with the public safety and security arrangements for the Proposed Event: the Chief Constable of the Abbotsford Police Department, the City's Fire Chief, the City's General Manager, Engineering and Regional Utilities, and the City's General Manager, Parks, Recreation, and Culture.

I have been advised by each of these officials or their designates that they are not satisfied with the public safety and security arrangements for the Proposed Event. Among other concerns, these individuals have shared with me that the Proposed Event is open-air, free-of-charge and un-ticketed, and will likely attract significant numbers of protestors and counter-protesters in addition to attendees. These elements, among others, make the community safety considerations of the Proposed Event extremely difficult to mitigate and I find that no permit conditions could adequately address the potential risks to the public.

Thank you for your understanding. If you have any questions, please contact Ken Leung, the City's General Manager, Legal and Legislative Services, at [redacted].

Sincerely,

Peter Sparanese
City Manager

EVENT ORGANIZER PERMIT REQUIREMENTS CHECKLIST

EVENT: Let Us Worship: Revive in 25 **Event Date:** August 24, 2025

Complete?	Permit Requirement	Due Date	Description/Notes/Links
☑	Confirmed PRC Booking	ASAP	Park
☑	Special Event Permit Application	May 26, 2025	https://www.abbotsford.ca/form/outdoor-special-event-permit Attach the following: Event Agenda/Timelines, Event Notification Letter/Poster, Certificate of Insurance, Site Map, Safety Plan, Waste Management/Sustainability Plan, Parking Plan
☐	Special Event Permit Application Fee	Upon Reciept of Invoice	Invoice to be emailed after permit application is received. *Events with 200-499 people are $100 *Events with 500-999 people are $150 ***Events with 1000 or more people are $200** *Events with alcohol are $250 *Events under 200 people do not require a permit but need to follow City Bylaws and may require other permits or approvals for public safety
☑	Site Map(s) - attach with permit application	May 26, 2025	Include the location of stages, temporary seating, washrooms, tents, first aid, lost child, temporary fencing, vendor/sponsor booths, food and beverage vendors, city power requests, city water access requests, emergency access routes, entry/exits, ticketing booths, handwash stations, garbage and recycling bins, parking
☐	Safety Plan - attach with permit application if ready	May 26, 2025	A safety plan should include what your plan is for first aid, lost child/person/item, outdoor cooking safety, inclement weather and what you will do incase of a fire, police/security incident, evacuation or any other type of safety incident that could take place based on the scope and scale of your event. The BC Major Planned Events Guidelines is a resource you can reference to help create your plan.
☑	Event Notification Letter	May 26, 2025	Please provide a copy of your event notification letter. It is your responsibility to notify the neighbourhood atleast 3 days in advance of your event that it is taking place.
☐	Certificate of Insurance - attach with permit application if ready	May 26, 2025	Commercial General Liability insurance in the amount of: $5,000,000 minimum, per occurrence, or such higher amount as the City Manager may deem necessary or advisable, where the Site comprises or includes a Highway; (b)that includes a cross liability clause; (c)that includes the City of Abbotsford as a named insured; (d)that includes Abbotsford School District as named insured where the Site is owned or occupied by the School District; and (e)that provides the City a minimum of 30 days prior written notice of cancellation or material change. and includes all private parking lots as additional insured
☐	Permission from Private Parking Lots	May 26, 2025	Use of private parking lots requires permission in advance. Please provide email or letters for proof of permission for each private lot you plan to use.
☐	Portable Washrooms Contract	May 26, 2025	Please provide copy of your washroom contract to include how many portable washrooms, delivery and take down and location.

RESPONSIBILITY OF EVENT ORGANIZER - NOT REQUIRED TO SUBMIT TO CITY			
☐	Drone Use	Prior to event	Must follow Transport Canada Regulations
☐	Business Licenses	Prior to event	Please ensure all vendors selling items have Abbotsford Business Licenses.