



Oneida Custom Election Code (CEC) Report



Report Prepared by Erica Doxtator
CEC Project Lead
December 18, 2023



Table of Contents

Project Overview.....	1
Project Goals.....	1
Project History.....	1
Project Lead Scope and Responsibilities.....	2
Community Engagement Notices.....	2
In-Person Notice.....	2
Posts to Oneida’s Facebook Page.....	2
Mail-Out Notices.....	3
Survey Results.....	3
Community Engagement Sessions.....	4
Community Feedback Summary.....	5
Timeline for Making Chnages.....	6
Considerations for 2024 Implementation.....	7
Council Salary.....	7
Recommended Changes to draft CEC.....	7
Community Report.....	7
Contact ISC Managers on Timeline.....	8
Referendum Contract and Cost Analysis	8
No Further Community Engagement.....	8
Considerations for 2026 Implementation.....	8
Project Work Time Extension.....	8
Further Community Engagement.....	8
Referendum Contract for Services.....	9
Community Report.....	9
Community Input in Making Determination.....	9
Conclusion.....	9
Appendix A: Required and Recommended Changes.....	10
Required Changes.....	10
Recommended Changes.....	10
Appendix B: Splatsin Code of Ethics.....	13

Project Overview

Oneida Nation of the Thames (Oneida) held a referendum vote on a draft custom election code (CEC) in 2003. The draft CEC did not receive enough support to pass the regulation at that time. The CEC project was eventually abandoned in favour of prioritizing other Nation work.

The project was identified as a priority by Oneida's 2020-2022 Chief and Council and has remained a priority to date. A project lead was contracted to garner community input and feedback.

This report is prepared to provide Leadership with a summary of community consultations and includes recommendations to meet CEC project goals.

Project Goals

The goal of the CEC project is to implement a CEC that determines community leadership by way of a community informed process. The project is viewed as a significant step towards Nation sovereignty by removing governance over the selection of Oneida's elected leadership from the Government and returning decision making back to the community.

A project lead was brought on in October 2023 to analyze and review Oneida's draft CEC, conduct community engagement, and revise the draft code if deemed necessary.

Project History



The main goal of the CEC project is to replace Indian Act legislation with community-based decision-making regulations.

Significant work has gone into the project since 2022.

There have been five rounds of negotiations conducted between community drafting committees and Indigenous Services Canada (ISC). The current draft CEC was provided in April 2023. The draft is approved for a final vote by ISC; however, leadership recognized the importance of community engagement prior to holding a referendum.

A RFP was put out for a CEC project lead on August 22, 2023, which went unanswered until the successful application was submitted on October 10, 2023.

Project Lead Scope and Responsibilities

It is the responsibility of the project lead to:

1. Review and analyze the existing draft CEC in comparison with related regulations to determine best practices and identify any need for revisions.
2. Hold 2 initial community engagement sessions to determine community input for changes to the draft code.
3. Provide an interim report with outcomes and recommendations based on initial assessment and review along with community feedback.
4. To make any changes or revisions to the CEC as per direction from leadership.
5. To hold one or two additional community meetings to present changes to the draft CEC and submit changes to ISC.
6. Prepare mailout ballots for community vote and count ballots at the conclusion of the vote.

At the time that the contract was drafted/signed, the official referendum vote requirement was not on the radar. Therefore, the actual voting poll process is not included in the contract for this project.

Community Engagement Notices

In Person Notice

The CEC project was introduced at a community meeting that was held on

June 3, 2023. Copies of the draft code were distributed to communities members in attendance. Community members were also advised that community meetings would be scheduled over the next few months to gather feedback.

Oneida hosted an Annual General Meeting on November 17, 2023, where the CEC project was highlighted in all three sessions throughout the day. People were advised where to find more information on the project and how to get in touch with the project lead.

Posts to Oneida's Facebook Page

1. June 5, 2023-notice to the community that the draft code was now available on Oneida's website
2. November 6, 2023-The first community meeting notice for the December 2, 2023 in person community meeting and zoom session. The posting also included a link to the draft code.
3. November 16, 2023- Posting of both in person community meeting and zoom session dates and times. Also included was how to access the zoom link, YouTube video link, and survey link.
4. November 20, 2023 - Meeting notice for both the in-person community meeting and the zoom session.
5. December 4, 2023, a link to the CEC video located on YouTube was posted along with the link to the survey.

6. On December 6, 2023 reminder notice about the upcoming zoom session and link to the survey posted.
7. December 11, 2023 a reminder to complete the survey with a link to survey.

Mail-out Notices

Post cards with a QR code for locating the draft code on Oneida's Website were mailed out to community members on September 30, 2023.

Notice of Community Meetings on the CEC project were sent out in the November and December issues of the Oliwase. The December issue included the CEC with instructions to email any completed surveys to cec@oneida.on.ca. A direct mail-out meeting notice was sent one week prior to the December 2, 2023 CEC meeting.

Survey Results

There were a total of 136 responses to the survey as of the survey closure date of December 13, 2023.

The result are as follows:

1. Who should determine disputes arising from election?
Answer: 70% of people chose A-Elections Appeal Tribunal
2. Who Should Make Up an Elections Appeal Tribunal?
Answer:

- 44% of people said One Elder, One Youth (age 15-25), and 3 Community Members
- 34% of people chose 2 Elders, 1 Youth (age 15-25), and 2 Community Members
- There was quite a bit of discussion on this. The summary can be found at #'s 11 and 12 under Community Feedback Summary.

3. Should Chief and Council be Required to Work Full-Time?
Answer: 62% of people said yes.
4. Tenure of Chief and Council Office
Answer: 60% of people answered 4 years.
5. Nomination and Run for Chief AND Council
Answer: 56% of people said that running for both Shall be prohibited
6. Should Council be Permitted to Serve Consecutive Terms? If so, how Many?
Answer: There was almost an even split between two answers.
 - 40% of people said two Consecutive terms
 - 37% of people said unlimited consecutive terms
7. Criminal Reference or Vulnerable Sector
Answer:
 - 51% percent answered vulnerable sector

- A close 44% answering criminal reference
8. Serious Convictions: Criminal Record Background Disqualifiers
Answer: 71% answered: Convictions of serious offence such as murder, rape, a sexual offence, drug trafficking, selling alcohol without a liquor license, DUIs, Mischief, assault, fraud, and theft shall not be eligible to hold office indefinitely.
9. Criminal Record Disqualifiers/ Allowances
Answer:
- 47% of people answered Any potential candidate have a “clear record, meaning absolutely no convictions.
 - A further 21% of people felt that candidates should be eligible if the conviction was more than 10 years old.
10. Nominee Must be Present at Candidate’s Night to be Considered for an Elected Position.
Answer: 92% said yes
11. In the Event of a Tie, the Electoral Officer will Determine the Successor By
Answer:
- 38% said coin toss
 - 24% said tie to be broken in favour of a candidate who held office in the preceding election term. If no returning candidate, then

successor is to be decided by Coin toss

- 21% said tie be broken in favour of a candidate who did not hold office in the preceding election term. If no returning candidate, then successor is to be decided by coin toss.

12. Number of Councillors

Answer:

- 44% said one Chief five Councillors
- 26% said one Chief- seven Councillors
- 24% said one Chief- nine Councillors

13. Minimum Education Requirements

Answer:

- 44% answered Highschool
- A close 34% said Post Secondary

14. Council Salary

Answer:

- 38% indicated a council salary of 50,000-70,000
- 32% answered 30,000-50,000

15. Should a Candidate who Owes Money to the Nation be Eligible for Office of Chief or Councillor?

Answer: 65% of people said no.

Community Engagement Sessions

The project lead produced a video that persuasively outlines the main elements and goals of the CEC project. The video was posted to Oneida’s YouTube page

on November 16, 2023 and as of December 18, 2023, has 64 views.

There were 36 participants present for the in-person CEC meeting held on December 2, 2023. Oneida's interim CEO, and four 2022-2024 council members were also in attendance.

The project lead presented information on the history of Oneida's CEC, the main changes from the Indian Act, the process for making changes and ratification, as well as the survey results based on 96 responses at the time.

Following the presentation, the project lead led a discussion on main topics of contention, based on survey results.

There was a zoom session held on December 9, 2023. There was one participant of that session other than facilitators and interpreters. The code was presented along with survey results based on 102 responses at the time. A discussion period followed.

Community Feedback Summary

There were three outright objections to the implementation of the code expressed in community feedback. Otherwise, people did not seem to be opposed to the CEC, but are asking for additional elements of accountability and recommended the following:

1. More time to be allotted to community consultation in focus group format with attention to explaining the code's provisions especially how this code differs

from the Indian Act. An undertaking to provide more opportunity for input was expressed by the interim CEO, Project Lead, and Council member(s) at the meeting. Community members were advised to reach out via email at cec@oneida.on.ca to arrange for a meeting.

2. Clear job descriptions for Chief and Councillors and the requirement to fulfill their roles. There is question and apprehension about how/if this will be addressed with the implementation of a CEC.
3. Recommendation that Chief and Council undergo a mandatory comprehensive orientation at the outset of assuming office. This would ensure that Council understand their roles and responsibilities and the division of roles between Council and Administration.
4. There is a general question about whether full-time Councillors will translate to more efficiency. People do not seem to think that it will. The discussion focused mostly on what people would like to see happen to create a more effective Council other than a full-time working requirement.
5. Request that the information on CEC community meetings, survey, and YouTube videos be provided to the community another time with clear messaging.

-
6. Request that the formatting of the draft CEC be revised to make it easier to follow. Use of headings and subheadings rather than excessive use of numbering was suggested.
 7. Request that childcare be provided at community meetings to facilitate attendance.
 8. Chief and Council should have minimum qualifications to run for office. Although the qualifications varied from person to person, most would like to see a basic understanding of topics that are portfolio roles. They should also be of good character, morals, and values.
 9. Statements were made that full-time Council funding, including supporting infrastructure, should not take away from other community programming or services.
 10. That the terminology be clear that it applies to registered membership rather than “community members” because the ambiguity can lead to dispute.
 11. Tribunal should not have members any younger than 18. The suggestion was made that perhaps a Youth Council representative could have a role with the tribunal but a strong majority felt they should have no decision making capacity, considering voting age.
 12. Tribunal should be decided based on Clans, with one Member from each clan within each category of representation. It was expressed that tribunal members should also have minimum knowledge of governance.
 13. There was some discussion about whether staff members should be able to run with no clear majority. The draft code proposes full-time Council positions so this may not be relevant.
 14. The code being in English is inaccessible to some and should be made available in more modalities, especially in Oneida language.

Timeline for Making Changes

The project lead and interim CEO of Oneida met with ISC on November 2, 2023.

ISC provided timelines for approving any changes made to the draft code and providing any recommendations for revisions.

Each round of revisions is a 3-6 week process along with a 3-6 month timeline for final approval by the Minister. The final approval must be provided by July 8, 2024 for the CEC to come into effect for the 2024 election year.

Considering the timelines outlined by ISC, submissions made early January are not guaranteed to meet the July 8, 2024 deadline.

Considerations for 2024 Implementation

Council Salary

As per question 14 , the majority opinion is that council salary should be within the 50,000-70,000 range.

Although the 30,000-50,000 was a close second. There has been no financial analysis completed to date to determine whether a full-time council salary of Chief and Council, within the current financial parameters, would equate to a livable wage. This work is not within the scope of the project lead but should be made a priority if leadership is moving ahead with a 2024 implementation timeframe.

ISC provided contact information of Ron Mavin-regional Manager, First Nations Governance who may have a lead on funding that Oneida can tap into for council salary. Contact with Ron would need to be made as soon as possible if a financial analysis determines that additional funding is needed.

Recommended Changes to Draft CEC

There are some changes that the project lead has identified as necessary for the draft code including editing errors and conflicting terms.

There are also some changes that the project lead has recommended to improve the draft code and address potential conflicts.

Finally, there were strong majority opinions for changes based on community input. It is recommended

that the changes be made to reflect the majority opinion prior to a vote.

As noted in the “Community Feedback Summary” there has not been too much opposition to the code as drafted. The community’s thoughts and concerns were more with respect to accountability and creating a more effective council. Some changes have been recommended in attempts to satisfy community concerns to reach ratification. This is considering that the members we have heard from are an accurate representation of the members who will vote, which if difficult to determine for two main reasons:

1. Most of the Oneida’s population live off reserve and likely were not highly represented at the in-person meeting. The online meeting only had 1 participant.
2. Many eligible voters oppose the elected system’s governance and would not participate in meeting to provide input, but may vote no in protest.

All suggested changes are attached to this report as “*Schedule A*”.

Community Report

A community report is within the scope of the project lead and should be made a priority for 2024 CEC implementation. The report would include many of the same elements included herein, with some leadership specific reporting items removed.

The report would also advise the community of what has been changed from the draft code and explain why the changes were made.

Contact ISC Managers on Timeline

ISC regional representatives provided the interim CEO and the Project Lead with contact information for the ISC management team to inquire about pushing our code as priority. Although we were advised that it is unlikely this can be done, it would not hurt to try.

These changes should be approved and the draft code revised by early January 2024 in an attempt to meet the July 8, 2024 project deadline.

Referendum Contract and Cost Analysis

As per item # 5, it was a majority opinion that a hard copy of the draft code be mailed with the voting ballots. It has been suggested that a hard copy mail-out will cost roughly \$70,000. This amount will need to be considered and approved if leadership wishes to approve the hardcopy mail-out.

As also mentioned in more detail under “*Project lead Scope and Responsibilities*”. The Project Lead has not been contracted to conduct the referendum vote. An additional \$9,000 would be required to meet the standard for previous electoral officers conducting the same work.

No Further Community Engagement

As per community feedback summary item # 1, community members have

indicated that they want more community consultation with focus on explaining elements of the CEC in more detail. The project timeline would make this impossible if moving forward with 2024 implementation.

Note that Council Member(s), the interim CEO, and the Project lead undertook to fulfill the request for further consultation at the December 2, 2023 meeting; however, there have been no meeting requests by community members to date, with over two weeks’ time elapsed since the undertaking was made. The strict timeline issue was expressed in the community meeting as well as the goal to submit revisions by January 5, 2023.

Considerations for 2026 Implementation

Project Work Time Extension

If it is decided that the referendum vote will take place for 2026 implementation, it would extend the deadline for minister approval to July, 2026, relieving much of the timeline pressure outlined in “*Considerations for 2024 Implementation*”. Plenty of time would be provided to complete a Financial Analysis, budget allocation for referendum vote, and provides more time for further community engagement.

Further Community Engagement

As mentioned under “*Project lead Scope and Responsibilities*”, there are two remaining community meetings left in the contract. These final meetings

should be reserved for the mandatory referendum meeting that is to be held prior to the vote, as per the Indian act (*Indian Referendum Regulations* s. 4.3. https://lawslois.justice.gc.ca/eng/regulations/C.R.C.,_c._957/page-1.html).. Therefore, additional funding would need to be allocated to fund further community consultation.

The current project lead does not have the capacity to lend to robust community engagement. There will need to be some further discussion around whether the project lead can meet expectations before any commitment to a revision of contract for these services.

Referendum Contract for Services

Leadership will need to determine whether a new RFP would include conducting the referendum or to have that be a separate RFP process.

If more community engagements take place before 2026 implementation, leadership could avoid the hefty price attached to mail-out of the CEC. Conducting mobile engagement in locations where there is a high population of community members could be a more cost-effective way to distribute the physical draft CEC.

Community Report

It is recommended that the community report be distributed in either circumstance once leadership decides how to move forward. The project's success is heavily influenced by

community support and appraisal of the final draft CEC.

Community Input in Making Determination

If Chief and Council is undecided on whether to move forward with the 2024 or 2026, one alternate approach would be to poll the community. Revisions can be made that Chief and Council believes will satisfy the main concerns of the community. Explanation of revisions with a poll can be sent out asking if people are happy to go with ahead with a vote for 2024 implementation.

Conclusion

The recommendation is that Leadership consider extending the project timeline to 2026 implementation to allow time for more community consultation. This recommendation is made based on community input at the December 2, 2023 community meeting and in consideration of the stringent timeline for meeting the July 8, 2023 deadline.

It does seem feasible to meet implementation for 2024. The community seems to be more concerned with council accountability.

Accountability measures can be built into the code as per recommendations made in Appendix A, as well as the addition of a Code of Ethics, example included at Appendix B. Leadership can also poll the community on how to move forward with this project to assist with making a determination.

Appendix A: Required and Recommended Changes

Required Changes

The Draft has two sections 2.3.3, numbering needs fixing

The Draft has two sections 2.4.3, numbering needs fixing

2.5.3- typo, should be "Known"

2.5.6- Draft refers to the wrong section and needs to be fixed.

2.7.5- Says tribunal members shall not be employees of the council. Definition of "employees of the council" is required.

2.12.2(c)- Typo, should say "made"

2.13.10- Remove reference to Oneida's Legal Counsel, as it is my understanding that this position does not exist. Maybe can use the wording "legal counsel retained to give advice on the appeal".

2.14.6-There is no "appointment" under S. 2.14.5. It is assumed that this is supposed to refer to 2.14.4-Chief. The change would need to be made.

Recommended Changes

Definitions: Add "Code of Ethics" means guidelines, general rules of behaviour and standards established in accordance with section [TBD] of this code, which govern the conduct of candidates running for office and their supporters relating to their participation in the electoral process.

Acclamation Definition- This definition does not match the references to the term throughout the document. See 2.7.3 and 2.7.4. The way the definition is drafted could lead to controversy. I recommend changing the definition to "Election by Acclamation" which means "candidates are considered automatically elected when the number of candidates equals (or is less than) the number of seats vacant. "

Candidate Night-Independent consultant should be defined. Is that a non-Councillor, non-employee, non-Oneida member?

Elections Appeal Tribunal- means a committee of six (6) persons, two from each clan family. At least one member shall be an Elder and at least one member shall be a youth aged 18-25. All other tribunal members shall be registered community members. The Tribunal shall be appointed by the Oneida Nation of the Thames Council at least 30 days prior to the election for the purpose of handling all appeals that may be lodged concerning the election. The tribunal shall not consist of employees of Oneida Nation of the Thames or candidates in the election.

Section 2.3.4- Release of Personal Information- other than a voter's list is a breach of privacy issue and should be automatically disallowed. This clause is ambiguous as to whether the default is to not disclose personal information.

2.4.13 (h)- release of information other than name of voters should be disallowed.

2.4.14- The wording should be stronger. Recommended wording-"the default will be that elector information is not released without written consent"

2.4.15- same comments as 2.3.4 with respect to privacy issues.

S. 2.5 Eligibility-add Is not in arrears on payment of a debt to Oneida Nation of the Thames or to a company that Oneida Nation of the Thames has a financial interest in.

S 2.5 Eligibility- add Minimum High School Education

s. 2.5 Eligibility-add must Swear and sign the oat of office

S. 2.5- Add A person nominated as a candidate for either the office of Chief and the office of Councilor must successfully complete a two-day introduction to Council Roles and Responsibilities within 30 days of taking office.

S. 2.5.5- Any person convicted of a criminal offence shall not be eligible to hold office (for a period of up to 10 years-21% of people felt this should be forgiven after 10 years).

2.6.9- Problematic because this happens before Candidates Night. Recommended change: Only need what is stated in Subsection C. The way this is drafted, a nomination without acceptance by a nominee could have the effect of electing someone without their knowledge or approval. An added provision is recommended to rectify this: "The candidate and two other electors sign a nomination form, either at the nomination meeting or beforehand".

2.13.10(c)- Notify the candidates under appeal within fifteen (15) days from the date that all evidence is gathered, legal counsel have reviewed the evidence and all documentation, including recommendations, is provided to the Election Appeals Tribunal for their decision.

- This is an ambiguous timeline. Proposed: Within 15 days of deadline for candidate to provide a response.
- Remove reference to legal counsel
- Not sure what the direction is here. I think it is supposed to say notify the candidate of the decision but it doesn't quite get there. Proposed wording: have received all evidence and documentation as per s. 2.13.5 and s. 2.13.8, shall notify the candidate of their decision.

2.14.1- Convicted of an Indictable offence they are automatically removed from office-It is automatic here, yet 2.5.6 is passive on whether someone can run for office under the same circumstances. To avoid controversy, I think the wording here needs to match whatever is outlined in 2.5.5. as a disqualifying offence.

2.14.2(a)- Problematic wording which could be interpreted to allow notice to council assistant in lieu of authorization from Council. Potentially councillor can just provide notice each time and never be vacated from Council. Should state “and” notification to council assistant rather than “or”.

2.14.2 (b) same comments as written for S. 2.14.1 above.

2.14.3- Add “including but not limited to” wording to signal that this is not an exhaustive list.

2.14 Vacancy of Office- Add A council member elected under a by-election, or awarded a position under s.14.4 or S. 14.5, holds office only until expiry of the original office holder's term of office.

2.14.7- This whole section is at odds with 2.14.4, 2.14.5. and 2.14.6. IS it 3 months or 6 months? Essentially says the same thing but makes the permitted term of vacancy 6 months rather than 3 months before an election. Recommendation: to go with 6 months considering the cost and time requirement of an election.

2.12.2(h)- At odds with 2.5.5 which prohibits running for office for 10 years rather than for one term. That section states serious offence rather than indictable. All of the criminal clauses need to be uniform and consistent. This wording should be the same as 2.5.5.

3.3.2- 2.7.5 states that the election tribunal appointment shall be made 100 days before the election. This section states 60 days after for a total of 160 days. That is a long time, especially if they are compensated as recommended. They wouldn't have a role prior to an election so the wording in this section seems more acceptable. Recommended that 2.7.5 changed to reflect the same.

Nomination ballots only allow mail-in nomination of one person. It is recommended that ballots include more options.

Add to Oath -During my hours of employment, I will work solely on my job responsibilities and fulfill all my duties as laid out in my job description.

Add a Code of Ethics to the Code outlining main roles and responsibilities of Chief and Council. An example is attached at Appendix B.

Appendix B: Splatsin Code of Ethics

SPLATSIN CODE OF ETHICS

In accordance with s.204 of the Splatsin Custom Election Code 2012, Kukpi7 and each Council member elect must declare their intention to adhere to the Code of Ethics while serving in office within 10 days of the electoral officer's declaration in order to be sworn into office.

As a Kukpi7, Councillor, or employee of Splatsin, I hereby agree to the following Code of Ethics:

1. I will abide by the Band's Oath of Confidentiality;
2. I will fulfil my job responsibilities to the best of my abilities I will carry out the duties of my position conscientiously, loyally and honestly, remembering that my primary objective is to serve the Band Membership;
3. In my actions and words, I will promote and uphold the integrity and dignity of the Band, the Band Council and my fellow employees. Both on and off duty, I will conduct myself in a manner that will reflect credit to myself and the Band;
4. I will develop a positive attitude in dealing with fellow employees, Band members and the Kukpi7 and Council;
5. I will be prompt, courteous and temperate in the performance of my duties;
6. I will not publicly criticize other employees, past employees, or the policies of the Band;
7. If I feel changes are advisable, I will provide constructive criticism and suggestions through proper channels. I will seek to make the workplace as harmonious as possible;
8. I will attempt to communicate openly with other staff and to resolve differences in a constructive manner;
9. I will use initiative to find ways of doing my work efficiently, effectively and economically;
10. I will follow instructions attentively, be cooperative with my supervisors and co-workers and work as a team member with other Band employees;
11. During my hours of employment, I will work solely on my job responsibilities and fulfil all my duties as laid out in my job description;
12. Within my sphere of responsibility, I will recommend changes of policy, priorities, or procedures, when I believe that such changes would benefit the Band and would help to meet the objectives of my department;

-
13. I will strive toward self-improvement and professional development through self-evaluation and availing myself of available literature, upgrading and training when the opportunities arise;
 14. I will attend work punctually each day unless there is a valid reason for absence or lateness, in which case I will contact my immediate supervisor, or if that person is unavailable the Band Manager, at the start of the working day and provide in indication of when I expect to return to work;
 15. I will dress appropriately for my position and I acknowledge that the appearance of Band employees reflects on the Band administration as a whole;
 16. I will use equipment, property or supplies which are owned or rented by the Band for the authorized purposes only and I will use such equipment with care. I will report any maintenance required to an appropriate senior staff person;
 17. I will refuse any fees, gifts, or other tangibles offered to me in reward for duties performed by virtue of my position;
 18. I understand my relationship with the Band Council as a Band employee to be as follows:
 - a. Council will request my attendance at Council meetings if my presence is required;
 - b. If I wish to attend a Council meeting, I must submit a written request to be on the agenda;
 - c. In the event the matter is not related to my position as a staff member I must request time of work to attend the Council meeting if the matter is related to a personal matter and not related to Band business;
 - d. If I have any personal business or business activities that could conflict with Band business, I will disclose such to Council as soon as practicable;
 - e. If such business or activity actually does conflict with Band business, I must terminate my association with the business or resign my position with the Band.

DATED this day of , 2013.

Councillor