

UNIFORM LAW CONFERENCE OF CANADA

CIVIL LAW SECTION

VOTER RESIDENCY, VOTER IDENTIFICATION, AND ABSENTEE VOTING BY MEMBERS OF THE CANADIAN FORCES SERVING OUTSIDE OF CANADA

REPORT OF THE WORKING GROUP¹

Readers are cautioned that the ideas or conclusions set forth in this paper, including any proposed statutory language and any comments or recommendations, may not have been adopted by the Uniform Law Conference of Canada. They may not necessarily reflect the views of the Conference and its Delegates. Please consult the Resolutions on this topic as adopted by the Conference at the Annual meeting.

**Whitehorse, Yukon
August 2012**

VOTER RESIDENCY, VOTER IDENTIFICATION, AND ABSENTEE VOTING

Background

[1] In late 2009, the Uniform Law Conference of Canada (“ULCC”) Advisory Committee on Program Development and Management approved the formation of a working group to examine certain aspects of Canada’s election laws.

[2] Through a series of initial meetings, the working group members determined that there are certain areas of federal, provincial, and territorial election law which would benefit from harmonization, and where harmonization may be achievable. Three areas, all where voter residency issues are problematic, were selected for review:

- Establishing residency – minimum residency period, and uniform criteria;
- Voter identification requirements; and
- Residency rules and absentee voting procedures for members of the Canadian Forces serving outside of Canada.

Establishing residency – minimum residency period, and uniform criteria

[3] At present, there is a notable lack of uniformity in voter residency requirements across Canada. Although all jurisdictions require that an elector be domiciled, resident, or ordinarily resident in the jurisdiction to vote, the time of residence required before being eligible to vote and the rules for determining if or where one is resident are not uniform. For example, an individual is eligible to vote in an Ontario provincial election if they are resident in the electoral district on “general polling day”; there is no minimum period of residency in the Province of Ontario. Other jurisdictions require from 40 days to 12 months of residency in the province or territory before a person is eligible to vote.

[4] Rules for determining where a person is resident or ordinarily resident are equally varied. There is no consistency of treatment for voters who may have more than one place of residence, or no place of “ordinary residence”, such as:

- Students living away from home, whether from within the province or territory or from another Canadian jurisdiction;
- military personnel, whether posted in Canada or overseas; and
- other classes of persons, including inmates in correctional facilities, and persons with no place of residence or transient persons.

Voter identification requirements

[5] Voter identification requirements are relevant in two circumstances: first, when an individual is seeking to be placed on the voter’s list and second, when a voter arrives at a poll to vote. There are numerous differences in the voter identification requirements across Canada; for example some jurisdictions (see *Canada Elections Act*) permit vouching for individuals who do not have appropriate identification documents while other jurisdictions (Nova Scotia) now allow

UNIFORM LAW CONFERENCE OF CANADA

a person to confirm their residence by their own oath or affirmation. Some jurisdictions require voters to show ID at the polls in order to vote (for example, in Canada, Ontario, Saskatchewan and Quebec), while other jurisdictions do not require voters to show ID as long as a voter's name is on the list before he or she arrives at the poll.

[6] Voter identification is directly related to the basic residency issue, as two elements of identity must be proved before a person is allowed to vote: (i) who you are, including evidence that you are at least 18 years old and a Canadian citizen, and so fundamentally eligible to vote *somewhere* in Canada, and (ii) where you live, which determines in which district and on which voters list your name should appear. Almost all voters have some documentary evidence of who they are and their date of birth; many voters *do not* have documentary evidence of citizenship status, but electoral officials generally accept a person's own statement on this (and date of birth if need be). What is often most difficult for a voter to provide is documentary evidence of residence – not just the period of residence in the jurisdiction, but the specific place at which they reside. This can be an issue for anyone who has moved recently, for anyone who is boarding or sharing accommodations without being named on a lease or utility bills (many students and other young workers, construction or other contract workers, seasonal workers), or anyone with no fixed address (homeless people, many inmates in correctional facilities).

Residency rules and Absentee voting procedures for members of the Canadian Forces serving outside of Canada

[7] There are inconsistent residency rules for military voters across the country, which may create confusion for military personnel as to if or where they are entitled to vote in a given election. Some jurisdictions, including Prince Edward Island and Canada, have specific residency rules for military personnel, and have directly addressed the issue of absentee voting by members of the Canadian Forces in legislation. Other provincial and territorial statutes do not provide special residency rules or procedures for absentee voting by members of the Canadian military, but treat them the same as any other voters out of the jurisdiction during an election. Absentee voting by members of the military has also been identified as an area of concern by the Uniform Law Commission of the United States.

[8] Members of the Canadian Forces serving outside of Canada have the right to vote, but exercising that right in a provincial or territorial election can be problematic given the short time frames of Canadian elections. Uniform residency rules and procedures to facilitate voting by members of the Canadian Forces serving outside of Canada would benefit the individual electors and election administrators in Canada.

Recommendations of the Working Group

[9] The conclusions and recommendations of the working group are discussed in detail below. Proposed uniform provisions with commentary are attached as Appendix A.

Establishing residency

VOTER RESIDENCY, VOTER IDENTIFICATION, AND ABSENTEE VOTING

- *minimum residency period*

[10] As mentioned above, most jurisdictions require a person to have been resident in the province or territory from 40 days to 12 months before being eligible to vote, while Canada, Ontario and Newfoundland and Labrador have no minimum period of residency.

[11] The working group's starting point was that the right to vote as guaranteed by the *Charter* should only be restricted by a minimum period of residency if there is a compelling reason for doing so. Traditional reasons cited for residency period requirements, of ensuring that "voters are properly informed of the issues in any election" and "have a sufficient connection with the [jurisdiction]", no longer seem compelling in a modern, highly mobile, *Charter*-influenced society; the working group noted however that these traditional reasons were reiterated as recently as 2008 in the Anawak case in the Nunavut Court of Justice. (*Anawak v. Nunavut (Chief Electoral Officer)*, 2008 NUCJ 26, at paragraph 72.)

[12] The working group concluded that there are two main reasons for imposing a specific residency requirement on voters in provincial, territorial and federal elections: first, to determine where in the jurisdiction it is most appropriate for an elector to vote and second, to prevent an elector from voting in more than one electoral district in the same election (which was entirely legitimate when property ownership determined voting rights, as it still does in many local elections).

[13] Given that these two objectives are accomplished at the federal level and in Ontario and Newfoundland and Labrador without imposing a mandatory residency period on electors, the working group recommends that all minimum residency periods be removed. This is also the most likely route to uniformity as those jurisdictions that have no minimum residency period are unlikely to impose new barriers to voting.

[14] **This recommendation is reflected in section I of Appendix A.**

Establishing residency

- *uniform criteria*

[15] The working group spent considerable time examining issues relating to voter residency. The working group determined that a uniform list of criteria for determining a voter's residency (or "ordinary residency") is desirable. There are also potential risks with a lack of uniformity in this area - a person who moves from one province or territory to another could conceivably be ineligible to vote in either place for a period of time, given the rules that exist in some jurisdictions about losing residency. Although all jurisdictions set out criteria or rules for determining residency, there is a notable lack of uniformity across the country in this area now. Working toward an appropriate uniform list of criteria based on the current best practices appears to be the most likely route to uniformity.

[16] The group concluded that the uniform criteria for determining a voter's residency should

UNIFORM LAW CONFERENCE OF CANADA

be as concise as possible and be drafted in plain language. **The proposed uniform criteria for determining a voter's residency is set out in section II of Appendix A.**

[17] The working group determined that establishing special residency rules for certain classes of voters, such as students, members of the Canadian Forces, and other groups, is appropriate and necessary because of the unique factual circumstances which apply to these groups of voters. Making clear and consistent rules for these groups may also encourage greater participation in the electoral process.

[18] The working group placed a greater emphasis on students and members of the Canadian Forces as these groups of voters regularly cross provincial and national boundaries in large numbers, and there are unique public policy reasons for giving these groups special attention. Both groups are discussed in greater detail below.

[19] The working group was conscious of the fundamental rule that an individual be permitted to vote only once in an election in a jurisdiction, i.e. "one person, one vote." At the same time the group was aware of the current reality that many Canadians are highly mobile, and may have ties to a number of places within a jurisdiction. The working group adopted the position that, to the extent possible, people that have ties to a number of geographic locations, such as students or persons with more than one residence, should be given the option of electing their place of residency for voting purposes. Once an elector has chosen a location, they can only vote in that place. This approach recognizes that individuals may be highly mobile, and have ties to a number of places within a jurisdiction, but it also protects the equality of voters by ensuring that an individual elector votes only once in an election.

[20] The working group was also of the view that the "one person, one vote" rule should not apply inter-jurisdictionally – that is, if a person meets the residency and other voting requirements of more than one province or territory, there is no reason for objecting to that person voting in elections in each jurisdiction where they meet the requirements.

Establishing residency

- students

[21] In the case of students, there was general agreement among working group members that a flexible approach is recommended. The draft uniform provisions address three specific scenarios. The first scenario addresses students who leave their "home" jurisdiction to attend an educational institution outside the jurisdiction, whether in another province or outside the country. These students are considered to maintain their residency in their "home" jurisdiction for the duration of their studies. In the second scenario - students studying at a second location within their home province or territory - the draft allows a student to elect their place of residency. The student can choose the district in which their family home is located, or the district where they live while attending an educational institution.

[22] For the third scenario - students studying in a jurisdiction other than their home

VOTER RESIDENCY, VOTER IDENTIFICATION, AND ABSENTEE VOTING

jurisdiction - the working group recommends that the policy approach taken to student residency in Saskatchewan be adopted nationally. Saskatchewan's legislation is unique in that it expressly permits students from outside the Province attending school in Saskatchewan to vote in Saskatchewan. A number of members of the working group expressed the view that this flexible approach may engage students in the political process by increasing voting opportunities while respecting the "one person, one vote" rule.

[23] The working group's recommendation respecting students is reflected in section IV of Appendix A.

Establishing residency

- Members of the Canadian Forces

[24] A small number of provinces establish clear residency rules for members of the Canadian Forces. These rules are designed to allow Canadians serving outside the country or outside their province of ordinary residency the opportunity to vote in provincial and territorial elections. The working group recommends that the definition of "members of the Canadian Forces" used in Manitoba be adopted, and that a flexible approach to determining residency for members of the Canadian Forces be adopted. The uniform provisions in Appendix A regarding members of the Canadian Forces are largely based on Saskatchewan's provisions on students, and address three potential circumstances and the rules that apply in each circumstance. First, where a member of the Canadian Forces leaves a jurisdiction to serve as a member of the Canadian Forces, they are considered to remain resident in the jurisdiction in which they lived most recently. Second, where a member moves within a jurisdiction while serving, they may elect to be resident in either their original place of residence or the place where they are serving. In the third scenario, a member of the Canadian Forces who comes into a jurisdiction from another jurisdiction during their service, whether for a temporary or indefinite assignment, is considered resident in their new jurisdiction, even though they may still be considered resident in their former jurisdiction under its residency rules.

[25] If adopted nationally these rules will result in students and members of the Canadian Forces being entitled to vote in concurrent provincial or territorial elections. In the working group's view this flexible approach still respects the "one person, one vote" rule, because no individual will be entitled to vote twice in the same election, while recognizing the unique status of both students and members of the Canadian Forces in Canadian society.

[26] The working group's recommendations on residency rules for members of the Canadian Forces are set out in section V of Appendix A.

Establishing residency

- Commentary on inmates and other groups of electors to which specific rules may apply

UNIFORM LAW CONFERENCE OF CANADA

[27] There are a number of different classes of elector for which specific residency rules exist in Canadian legislation. Some jurisdictions have, for example, developed specific provisions for inmates, homeless persons and persons living in long term health care facilities. The working group considers that the general rule set out in section II of the draft adequately addresses the situation of homeless persons, or others living in temporary accommodations. Nevertheless, the working group recognized that there will likely be local variation in the rules for some of these specific groups.

[28] With respect to inmates, the working group members recommend that jurisdictions adopt an approach similar to that in Saskatchewan, British Columbia and Nunavut. In these jurisdictions, the law permits the individual inmate to choose one of two places as their place of ordinary residence – an individual can choose the place where they were ordinarily resident before coming into custody, or the place where a spouse, parent or dependent is ordinarily resident. The option of voting where the institution is located should only be available if neither of the two options above were available, for example where a voter was not ordinarily resident in the jurisdiction at the time of incarceration and has no family or dependents in the jurisdiction.

[29] The working group recognized that there could be political opposition to a rule that allowed inmates to choose a correctional facility as their place of ordinary residence due to the possible distortion of election results. The working group has not prepared a draft legislation provision respecting inmates.

Voter Identification Requirements

[30] Most jurisdictions require satisfactory evidence of a person's identity, basic qualifications to vote, and address before adding them to the voters list. What constitutes "satisfactory evidence" varies from one jurisdiction to another, based on local circumstances. The working group concluded that for the purposes of this project, it was unnecessary to address the precise kinds of ID that should be required. Provincial and territorial legislation should allow for local variation in the kinds of ID that is available or considered necessary.

[31] Legislation across the country varies on whether a voter on the voter's list needs to provide ID before they can receive a ballot. Elections Canada, Quebec, Saskatchewan and Ontario now require ID. This is a fairly recent change. Smaller jurisdictions would likely see little need for ID from those already on the voter's list. The working group has not developed draft uniform provisions respecting voter identification requirements.

Residency rules and Absentee voting procedures for members of the Canadian Forces serving outside of Canada

[32] The recommended residency rules for members of the Canadian Forces are discussed above in paragraphs [24] to [26].

VOTER RESIDENCY, VOTER IDENTIFICATION, AND ABSENTEE VOTING

[33] The working group members held a teleconference with a representative of the Judge Advocate General's Estates and Elections Section on December 8, 2011. The JAG officer provided a comprehensive overview of the Section's work to ensure that Canadian Forces electors are able to exercise their right to vote. The focus of the Section's work is – as expected – on the administration of the Canadian Forces vote during the federal election, and the Section's duties under the *Canada Elections Act*. The administrative procedures set out in the *Canada Elections Act* are comprehensive, and the Act imposes specific duties on the Canadian Forces regarding the administration of the vote.

[34] The Estates and Elections Section does play a limited role in provincial and territorial elections by sharing information on these elections through the CANELECTGENS system, which is an electronic notification system. It was explained to the working group that the Section's role in provincial and territorial elections has been limited, although requests for assistance have been made by several provincial and territorial jurisdictions in the past.

[35] The working group considered whether the *Canada Elections Act* offered a model for absentee voting by members of the Canadian Forces in provincial and territorial elections. It was generally agreed that the *Canada Elections Act* does not offer a practical model for provinces and territories both because of the complexity of the relevant provisions and the fact that the provinces and territories cannot impose an administrative role on the Canadian Forces through provincial or territorial legislation.

[36] The working group concluded that existing provisions allowing a Chief Electoral Officer to “pilot” new procedures, technologies and equipment (such as section 357 of the *Nova Scotia Elections Act*) could be amended to specifically authorize the piloting of procedures designed to facilitate absentee voting by members of the Canadian Forces. In a jurisdiction without clear authority for the CEO to “pilot” new procedures, technologies or equipment, a stand-alone provision with the same objective could be adopted. The working group also recommends the adoption of a provision (or the modification of existing provisions) authorizing the Chief Electoral Officer to enter into an agreement with the Canadian Forces, and the Chief Electoral Officer for Canada or any other province or territory, for the purpose of facilitating absentee voting by members of the Canadian Forces, or any other voters (e.g., students).

[37] Provisions authorizing piloting of new procedures, technologies and equipment and authorizing agreements for the purpose of assisting with absentee voting by Canadian Forces (and other) electors would lay the foundation for further evolution of this area of law and election administration. If certain practices are eventually piloted, such as the electronic transmission of the ballot or some form of supervised electronic voting, these practices could be evaluated, and, if appropriate, formalized in legislation and regulation.

Request for Direction from the ULCC

[38] The Working Group is seeking direction from the Conference on two matters.

UNIFORM LAW CONFERENCE OF CANADA

[39] First, the working group asks the conference to consider whether further consultation with Canada's Chief Electoral Officers on this final report and the draft uniform provisions in Appendix A is recommended. The Chair of the working group shared the 2011 report with the country's CEOs in 2012, however, the draft uniform provisions have not been shared for comment. It was generally agreed by the working group members that giving Chief Electoral Officers the opportunity to comment on the final report and the draft uniform provisions would increase the likelihood that the uniform provisions will be adopted in individual jurisdictions.

[40] The working group is also requesting the Conference's direction on the future mandate and composition of the working group.

¹ **Current members** - Peter Pagano, QC, and Susan Hardy, Alberta Justice; Darcy McGovern, Ministry of Justice and Attorney General, Saskatchewan; Ann McIntosh, Department of Justice, Nunavut; Elizabeth Strange, Office of the Attorney General, New Brunswick; Phil Reid, Department of Justice, Nova Scotia; David Nurse, formerly with the Department of Justice, Nova Scotia, and former jurisdictional representative to the Civil Section (Chair); **Past members** - Christine McCulloch, QC, Chief Electoral Officer, Nova Scotia; Christine Mosher, Department of Justice, Nova Scotia; Sarah Dafoe, Alberta Justice.

Appendix A

Voter Residency – General Rules and Special Circumstances

VOTER RESIDENCY, VOTER IDENTIFICATION, AND ABSENTEE VOTING

Eligibility to vote

I. An [individual]¹ is entitled to vote in an election being held in an [electoral district] if on polling day [voting day] he or she is

- (a) a Canadian citizen;
- (b) at least 18 years old;
- (c) a resident in the [jurisdiction];
- (d) a resident in the [electoral district].

Commentary - This uniform provision does not include any minimum residency requirement for an elector. Removing the minimum residency requirement for an elector to vote is considered the most likely path to uniformity in this area. If the elector will meet the conditions set out in this provision on polling day or voting day (as that day is defined in each jurisdiction), the elector is entitled to vote. It is assumed that an individual who meets, or will meet the criteria on polling day, would be entitled to vote at an advance voting opportunity during the writ period. For example, an individual who will turn 18 on polling day would be entitled to vote at an advance poll.

General rules

II. The following general rules apply in determining where an [individual] is resident for the purposes of voting at an election under this Act:

- (a) an [individual] is resident in that place where he or she ordinarily resides;
- (b) an [individual] can have only one residence and it does not change until the individual becomes resident in a new place;
- (c) an [individual] who leaves his or her residence and goes to another place for a temporary purpose, either within or outside [province or territory x], retains his or her ordinary residence;
- (d) an [individual] may be considered to be resident in temporary quarters such as a shelter, hostel or similar provider of food, lodging or social services if there is no other place that the [individual] considers to be his or her residence.

Commentary - These rules are intended to apply only for determining residency for voting purposes. If the same residency rules would be used for other purposes, such as for determining eligibility to be an election official or candidate, then the wording could be amended to say "for the purposes of this Act". Some jurisdictions may choose to reference "for the purposes of this Part".

The contents of this section and its analogies across Canada are derived from the concept

UNIFORM LAW CONFERENCE OF CANADA

"ordinarily resident", at common law - we have found no synonym ("normal, usual, etc...") that works as well in i) making the connection to that common law history or ii) in terms of statutory interpretation and plain language.

Special circumstances to be considered

III. Despite the general rules set out in section II, the special circumstances set out in sections IV to VI apply in determining where an [individual] is resident for the purposes of voting at an election under this Act.

Commentary - This section provides an introduction to the provisions to follow. It confirms that the general rules for establishing residency are set out in section II, but that specific rules are needed for specific classes of electors.

Students

IV. (1) If an [individual] leaves his or her residence in [province or territory X] to study at an educational institution outside [province or territory X], the [individual] is, while pursuing his or her studies, considered to be resident in the place where he or she was resident immediately before commencing his or her studies.

(2) If an [individual] leaves his or her residence in [province or territory X] to study at an educational institution elsewhere in [province or territory X], the [individual] may, while pursuing his or her studies, consider one of the following as his or her place of residence:

(a) the place where he or she was resident immediately before commencing his or her studies;

(b) the place where the [individual] is residing.

(3) If an [individual] leaves his or her residence in a province or territory other than [province or territory X] to study at an educational institution in [province or territory X], the [individual] is, while pursuing his or her studies in [province or territory X], considered to be resident in the place where the [individual] is residing.

Commentary - The draft uniform provisions address three specific scenarios. The first scenario addresses students who leave their "home" jurisdiction to attend an educational institution outside the jurisdiction, whether in another province or outside the country. These students are considered to maintain their residency in their "home" jurisdiction for the duration of their studies. In the second scenario - students studying at a second location within their home province or territory - the draft allows a student to elect their place of residency. The student can choose the district in which their family home is located, or the district where they live while attending an educational institution. For the third scenario - students studying in a jurisdiction other than their home jurisdiction - the working group recommends that the policy approach taken to student residency in Saskatchewan be adopted nationally. Saskatchewan's legislation is

VOTER RESIDENCY, VOTER IDENTIFICATION, AND ABSENTEE VOTING

unique in that it expressly permits students from outside the Province attending school in Saskatchewan to vote in Saskatchewan.

Canadian Forces

V. (1) In this section, "*member of the Canadian Forces*" means

- (a) a member of the regular force or the special force of the Canadian Forces; or
- (b) a member of the reserve force of the Canadian Forces who is on full-time training or service or on active service.

(2) If an [individual] leaves his or her residence in [province or territory X] to serve as a member of the Canadian Forces outside [province or territory X], the [individual] is, while serving as a member of the Canadian Forces, considered to be resident in the place where he or she was last ordinarily resident.

(3) If an [individual] leaves his or her residence in [province or territory X] to serve as a member of the Canadian Forces elsewhere in [province or territory X], the [individual] may, while serving as a member of the Canadian Forces [in province or territory X], consider one of the following as his or her place of residence:

- (a) the place where he or she was last ordinarily resident;
- (b) the place where the [individual] is residing.

(4) If an [individual] leaves his or her residence in a province or territory other than [province or territory X] to serve as a member of the Canadian Forces in [province or territory X], the [individual] is, while serving as a member of the Canadian Forces in [province or territory X], considered to be resident in the place where the [individual] is residing.

Commentary - The uniform provisions regarding members of the Canadian Forces are largely based on Saskatchewan's provisions on students, and address three potential circumstances and the rules that apply in each circumstance. First, where a member of the Canadian Forces leaves a jurisdiction to serve as a member of the Canadian Forces, they are considered to remain resident in the jurisdiction in which they lived most recently. Second, where a member moves within a jurisdiction while serving, they may elect to be resident in either their original place of residence or the place where they are serving. In the third scenario, a member of the Canadian Forces who comes into a jurisdiction from another jurisdiction during their service, whether for a temporary or indefinite assignment, is considered resident in their new jurisdiction, even though they may still be considered resident in their former jurisdiction under its residency rules.

As noted in the attached report, the above sections regarding students and members of the Canadian Forces are intended to provide special residency rules for students and members of

UNIFORM LAW CONFERENCE OF CANADA

the Canadian Forces. These rules, if adopted nationally, would result in students and members of the Canadian Forces being able to elect one residence in a jurisdiction where they have two possible choices, and would entitle some to vote in concurrent provincial or territorial elections. In the working group's view this flexible approach still respects the "one person, one vote" rule, because no individual will be entitled to vote twice in the same election.

This section provides that spouses and dependants of those persons in the classes listed above (students and members of the Canadian Forces) who leave the jurisdiction because they reside with a student or a member of the Canadian Forces, are considered to be resident in the electoral district they resided in before leaving the electoral district or jurisdiction.

[Spouse] or dependant

VI. If an [individual] leaves his or her residence in an [electoral district in province or territory X] because he or she lives with an [individual] referred to in sections IV or V as the [spouse] or dependant of that [individual], his or her place of residence may be determined as follows:

- (a) he or she is considered to be resident in the place where the [individual] referred to in sections IV or V resides; or
- (b) in the case where the [spouse] or dependant lives with an [individual] referred to in subsections IV(2) or V(3), one of the places referred to in those subsections may be considered as his or her place of residence.

Commentary – This section provides that spouses and dependants of those persons in the classes listed above (students and members of the Canadian Forces) who leave the jurisdiction because they reside with a student or a member of the Canadian Forces, are considered to be resident in the electoral district they resided in before leaving the electoral district or jurisdiction.

Election Officers' Authority

VII. If the general rules and special circumstances set out in sections I to VI are not sufficient to determine an [individual's] place of residence, [the appropriate election officer] may determine the [individual's] place of residence by reference to all the facts of the case.

Commentary - This section confirms the approach seen in many jurisdictions today. Where the rules set out in the statute are not sufficient to establish a person's place of residence, the appropriate election officer is given the authority to determine the individual's place of residence by reference to all the facts in the case.

This wording would be consistent with the common law, e.g. Thompson v. Canada (MNR) [1946] S.C.R. 209; <http://canlii.ca/t/22x5t>, Haig v. Canada; Haig v. Canada (Chief Electoral Officer), 1993) 2 S.C.R. 995, Martin v. Mailman et al., 2004 NLSCD 208 (CanLII), <http://canlii.ca/t/1j3l6>, Anawak v. Nunavut (Chief Electoral Officer), 2008 NUCJ 24 (CanLII), <http://canlii.ca/t/212rb>. Also, it mirrors s. 9 of the Canada Elections Act.

VOTER RESIDENCY, VOTER IDENTIFICATION, AND ABSENTEE VOTING
