

# Surveillance-ready-subjects

## The making of Canadian anti-masking law

*Debra Mackinnon*

---

### Introduction

Donning a mask has become routine at protests, riots and other gatherings. Be it the balaclavas and indigenous dress worn by the Zapatistas, the helmets and gas-masks worn by members of the Black Bloc, the brightly coloured and fragile bodies of the Carnavalesque, the Guantanamo-style hoodies of anti-war protesters, or the prototypical Guy Fawkes mask, these various forms of masking bring together dissenters from both idealistic and antagonistic perspectives (Ruiz, 2013). Despite the rich history and purpose of masking for each of these groups, this heterogeneity has been ignored, and even conflated, as lawmakers move to criminalize this practice.

In the days following the June 2011 Vancouver Stanley Cup riots, Canadian law enforcement and lawmakers faced immense criticism for the poor control of protestors and riots. As a result, they turned to other jurisdictions for policies and best practices (Mackinnon, 2014).<sup>1</sup> Adopting a Canadian Association of Chiefs of Police anti-masking policy recommendation from 2002, Victoria Police (VicPD) Chief Jamie Graham co-opted the violent imagery (re)produced by the media at the time, and attributed the property destruction occurring at protests, assemblies, and riots to ‘pinhead anarchists’, ‘travelling-criminals’ and ‘violent thugs who employ Black Bloc tactics’ (Doc20, 21 June 2011).<sup>2</sup> With similar policy recommendations underway (Doc35, 10 June 2011; Doc29), Vancouver Police (VPD) Chief Jim Chu endorsed Graham’s mandate and they pooled together resources and preliminary research<sup>3</sup> to consolidate an official statement (Doc22, 22–23 June 2011). Months later, their updated policy recommendation was introduced to parliament by MP Blake Richards as a private member’s bill, *The Preventing Persons from Concealing their Identity during Riots and Unlawful Assemblies Act* (Bill C-309). Anti-masking law was presented as an additional ‘tool’ expanding the paramilitary policeman’s ‘tool kit’ – already outfitted with long-range acoustic devices, water cannons, anti-bandit glass, rubber bullets, and full tactical gear – that would enable police to more quickly and efficiently identify and process riots. However, unlike these other ‘tools’, this discretionary law promised to pre-emptively control situations in order to

protect the properly behaving demonstrator. While critics initially raised issues of ‘tough on crime’ sensationalism, redundancy, relevancy and human rights violations, these concerns were quickly dismissed throughout legislative debates and, as of 19 June 2013, those wearing a mask during a riot or unlawful assembly may face up to ten years in prison.

Drawing upon Access to Information and Freedom of Information releases from government agencies, news reports and parliamentary debates,<sup>4</sup> this chapter offers a detailed, empiric account that critiques and investigates the creation and justification of Canadian anti-masking law. Specifically, it examines how discourses of pre-emptive control and a logic of anticipation were invoked throughout the making of the law, thereby providing a lens with which to view the broader implications of violating and adhering to the law.

Through the dismissal of rights, the conflation of events, and the invocation of anarchist folk devils, masks were made to represent violent intent at public demonstrations – an indicator, used to both construct and then identify the illegal and the unlawful. Rather than criminalizing an action that was already a minor criminal offence, Canadian anti-masking law provides a new means of targeting groups, creating criminal records and ordering bodies. But beyond criminalizing practices of anonymity and public invisibility, the anti-masking law also provisions an optimized surveillance-ready subject, formally requiring bodies to become standardized data portraits that are interoperable with other systems of identification. With little oversight and intervention, police have legislated an expedient method of socially sorting populations that continues to align with the digital surveillance practices of the information age.

## **Making anti-masking law**

Under the guise of security, crime prevention, and public safety, a ‘tough on crime’ mandate has engulfed legislative branches on a global scale with far reaching effects. In Canada, paramilitary policing has become commonplace at protests (Rafail, 2010) and mega sporting events (Boyle & Haggerty, 2009; Molnar & Snider, 2011); activists and social movements have been labelled as terrorists and targeted by increased surveillance practices (Monaghan & Walby, 2012a; Perry & Kang 2012); technologies used by police have become more sophisticated and interoperable (Leman-Langlois, 2008; Seiden, 2015); and various pre-emptive control practices, including anti-masking law,<sup>5</sup> have been employed to further order and control space and people (Fernandez, 2008). The intersection of these practices highlights the growing scope of securitizing practices and the criminalization of dissent.

Framed as a subset of these broader discussions, anti-masking law has been deployed to target public assemblies, protests and a variety of social movements both offline and online (Harbisher, 2016). Understood as both a justification and response to these changing demonstration tactics, anti-masking legislation

has been ushered in on a global scale, with numerous jurisdictions establishing harsh penalties for the wearing of a mask (Blas, 2013; Ruiz, 2013).

While disguise with intent has been in the Canadian Criminal Code since 1985, anti-masking has a much longer history in the Western context. Dating back to 1845 in the United States, anti-masking was used as a means of impeding Ku Klux Klan activity and, more recently, US jurisdictions have revived and recontextualized anti-masking legislation as a general means of quelling political dissent (Fernandez, 2008). Although still the subject of constitutional debate in the American judicial system (Kaminski, 2013; Simoni, 1992), since the 2000s anti-masking laws have been used periodically against climate-change activists in Detroit, animal rights activists in DC, and anti-globalization, Occupy Wall Street and Pussy Riot solidary demonstrations in New York City (ACLU, 2000; Council of the District of Columbia, 2010; Doll, 2010; Gardiner & Firger, 2011; Moynihan, 2012).

Many European countries, including Germany (1985), Norway (1995), Denmark (2000) and Russia (2012), have incorporated anti-masking law into existing assembly and police acts. Perhaps more explicit than in other European countries, an amendment to the Danish Criminal Code specifically criminalizes the wearing of a hoods, masks and face paint that prevent identification. With sporadic and uneven application, this law was used to controversially shut down a 2010 UN Climate Change Summit protest in Copenhagen (Mills, 2010).

In the same year, under the guise of promoting secular values, France banned the wearing of a mask, helmet, balaclava, Niqāb and other veils in public space – a convenient foil to the law's Islamophobic undertones. In Spain, as part of efforts to control responses to increasing austerity measures, the fine for wearing a mask during a protest was raised to €30,000 (O'Leary & González, 2013). During Euromaidan in the Ukraine, anti-protest measures were introduced to de-escalate violence; however, in 2014, many of these measures, including anti-masking law, were repealed (RT, 2014). Offered as a compelling solution to recent protests, governments in both South Korea and Hong Kong have also discussed the pressing need for anti-masking law (*Korean Herald*, 2015; Lou, 2016). As countries increasingly add anti-masking to an ever-pervasive 'policeman's toolkit' (Kaminski, 2013) – with little discussion of its legality, effectiveness or purpose – it is reinforced as a symbolic means of criminalizing counter-surveillance and anonymity.

While police, politicians and others account for (or determine and solidify) what masks mean, contending understandings exist far beyond their immediate or histrionic appearance. Evocative and transcendent, masks have also become a way of protecting anonymity, as well as exercising collectivity, democracy and resistance (Monahan, 2015; Ruiz, 2013). Considered a blocking move (Marx, 2003), by obscuring the face, masks guard against immediate identification while enabling participation in the public and civil sphere. Masks become not only a form of protection, they also serve to undermine hierarchy and authoritarianism (Ruiz, 2013). Although specific aspects of dissent are being dismantled, weakened,

and criminalized – thereby making dissenters ‘surveillance-ready’ – Nail (2013) argues that masking nevertheless remains a strategy that ‘rejects political representation and identity in favor of direct democracy and equality’. As a means of exercising power and collective identity from below – masks unite groups – creating commonality and simultaneously subverting but also increasing visibility (Ruiz, 2013; St. John, 2008). By weaponizing the face (Blas, 2013) masks become a performative and dramaturgical display of resistance (Monahan, 2015) and public ritual (St. John, 2008; Szerszynski, 1999). Blas (2013) argues that this resistance to public invisibility has effectively disrupted biometric technologies necessitating authorities to criminalize this practice.

Reinforcing a turn towards ‘global face culture’ (Blas, 2013) the masked face constitutes a threat to authority. Anti-masking law, in many ways, formalizes the alignment of protest control militarization and the wide scale adoption of CCTV technologies with facial verification capabilities. While anti-masking may have disrupted a particular practice of looking, or means of identifying, ‘faces of interest’, the verbalization of the observable (Neyland, 2006, p. 29) traced through the making of this law in many ways has helped to sharpen *what* is of interest.

### **‘Striking a balance’: rights and freedoms versus crime control**

Discussion of specific anti-masking legislation in Canada can be traced as far back as 2002. Days before the 15 June 2011 Stanley Cup Riots, both the VPD and VicPD submitted recommendations calling for either an amendment to the Criminal Code or alternative legislation that would prohibit the wearing of masks (Doc35, 10 June 2011). Shortly after the highly publicized and infamous riot, these recommendations were made ever-more exigent, as notable Police Chiefs from across Canada were quickly summoned to endorse the policy recommendation (CBC, 2011). As the recommendation gained further momentum, Chief Graham contacted the Office of the Attorney General and candidly stated the intentions behind his revised policy.

We know this is fraught with constitution problems but being attacked by masked anarchists in the middle of the 2011 Stanley Cup riot has left many officers wondering why we haven’t tackled this. Protestors with backpacks of water (cleanse pepper spray) and bandanas (hide the identity of thieves and rioters) were not uncommon during the Vancouver riot last week. With the number of officers injured, we are putting together a submission to move this forward.

(Doc20, 21 June 2011)

In this email, Graham used much of the VPD’s preliminary research to strengthen and legitimize his discussions of violence. Once further refined through the political mill, Graham continued to repurpose disjunctive logic

casting liberty at odds with security in order to justify increasing police powers. For instance, in a later communication, he argued that while police are ‘the first to support’ rights guaranteed under the Charter, the prevalence of ‘disguises, masks, or facial coverings’ at protests and demonstrations allows the violent offenders to mingle with legitimate protestors. (Doc26, 11 August 2011). Long used by negotiation management policing, Chief Graham’s statement casts masks as symbols of violence and a means of identifying the ‘legitimate’ from ‘illegitimate’ protestor (McCarthy & McPhail, 1998). Furthermore, by suggesting that masks allow crimes and criminals to go unpunished, Chief Graham asserted that ‘government and police intrusion into peaceful protest has to be balanced against the need for people to be safe’ (Doc26, 11 August 2011).

Once introduced to parliament by MP Blake Richards, the need for ‘balance’ permeated discussions, with numerous Members of Parliament employing the phrase ‘striking a balance’. When introducing the bill to the house, MP Richards co-opted the power of this phrasing and recontextualized Chief Graham’s articulation of balance.

This bill is a measured response to a problem that law enforcement officials have grappled with for years [...] No one should be able to commit violent destructive crimes against person and property with impunity under a cloak of anonymity [...] This bill strikes a balance between allowing lawful peaceful protest and suppressing unlawful activities in a disturbance. I would suggest it serves to strengthen legitimate peaceful assemblies by giving people new means to act against those who are intent on using peaceful assemblies as covers for their criminal behaviour.

(Richards, 3 October 2011)

By arguing that it was a measured response to a long standing issue, MP Richards’ discussion of the bill presented the Stanley Cup riots, as well as the Toronto G20 Protests, Vancouver Olympics Demonstrations and Occupy, as moments of ‘insecurity’. In doing so, throughout the legislative debate, law enforcers and other securitizing actors managed to persuade legislators and the public of the immediate risk. Utilizing the persuasive rhetoric of ‘security’, MP Richards promised that anti-masking law would benefit the ‘average Canadian’, since it promotes ‘public safety and better protection of private and public property through deterrence of riots; swifter prosecution and the possibility of longer sentences’ (Doc32, 27 April 2012).

With these perlocutionary acts, the negative outcomes of the Stanley Cup riots – vandalism, damage to private property and threat to public safety – became the inherent risk of all future social movement actions, and carried the intended effect of encouraging legislators to support the bill. This illocutionary sleight of hand did not go unnoticed, as Liberal MP Joyce Murray challenged the intentions of the bill. Rather than ‘looking for a balance’, she argued the purpose of the law was to ‘make the work of police officers easier, at the expense

of the rights of individuals and their right to express themselves' (Canada, Parliament. Standing Committee on Justice and Human Rights, 2012b). The ensuing debate and dismissal of rights and liberty signalled a shift in discussion, which now centred on achieving the most effective means of *preventing* violent crime. In a sense, this legislation was no longer about post-hoc identification (as it was originally proposed); rather, it extended the power of police by adding a pre-emptive, a priori identification tool to the growing street-level bureaucrat's 'tool-kit'.<sup>6</sup>

### **'The policemen's tool kit': discretionary use of pre-emptive crime control**

Police have long advised that their inability to pre-emptively deal with individuals who were concealing their identities in the middle of such explosive situations is hindering their ability to maintain control and to protect the public [...] This bill has the potential to deter and de-escalate such unfortunate events in the future to protect persons and property.

(Richards, 2011a)

After the bill's introduction, MP Richards repeatedly used the term 'pre-emptive' in media lines and releases. When crafting both the questions and answers to his Q&A release, MP Richards framed Bill C-309 as a way for the police to 'protect and serve the public' (Doc32, 27 April 2012).

It will give police proactive, rather than reactive power to deal with riots and unlawful assemblies. The ability to demand individuals in a riot to unmask, and to detain and charge them if they do not, will allow police to remove masked individuals from the scene and prevent them from instigating criminal acts or engaging in them. It will also enable police to more quickly and efficiently identify rioters to pursue charges against them if these individuals are prevented by law from covering their face. Deterrence is the main objective of the law. Those who are unable to conceal their identity are less likely to engage publically in criminality, for fear of a greater likelihood of being identified and subject to prosecution.

(Doc32, 27 April 2012)

While invoking the imagery of protests in this media release, MP Richards was careful to speak in particulars, by discussing Bill C-309 as both a deterrent and a pre-emptive means of curtailing 'riots' and 'unlawful assemblies'. This careful framing discursively distanced Bill C-309 from the earlier policy recommendation from both Chief Graham and Chief Chu. Furthermore, their 'distance from authorship' enabled Chief Graham to implement a different form of support to MP Richards. At the 1 May 2012 Standing Committee on Justice and Human Rights, Chief Graham provided expert testimony that synthesized his initial

work with carefully constructed statements from MP Richards's legislative assistant. Not without criticism, this pre-emptive logic was used ad nauseam by Liberal and Conservative MPs and a slew of stakeholders. A long-standing practice of the liberty-security regime (Neocleous & Rigakos, 2011), these discursive patterns falsely cast rights at odds from crime control in order to further control populations. Richards's final statement concluding his discussion in the House of Commons typified this discourse. Since 'masked criminals that work the riots' are prepared, armed and motivated, he argued police should be equally equipped (Richards, 2012b). Anti-masking law was the solution.

[...] one key tool is missing from their toolkit: a tool that would help police prevent, de-escalate and control riots; a tool that would spell the difference between legal orderly expression and total destruction of a neighbourhood; a tool that would protect our nation's citizens, emergency service workers, private businesses and public property; a tool that would protect lawful demonstrators' ability to put voice to their beliefs; a tool that would prevent violence on Canadian streets.

(Richards, 2012)

The combination of these statements concocted a potent narrative calling for pre-emptive crime control, the message being: crime can be prevented before it even happens – if we give police the right tools. This 'tool' enables officers to presuppose that wearing a mask is indicative of a person's intent to commit a violent action. For lawmakers, the act of wearing a mask fulfils the legal standards of *mens rea* and *actus reus*, whether or not the person is at an unlawful assembly or riot. But given the conflation of riots, unlawful assemblies, and protests, what is the actual scope of this legislation – when does wearing a mask become illegal? By cloaking this bill in discourses of violence prevention, protests, riots and assemblies were continually presented as interchangeable events – all of which necessitated anti-masking legislation. While Bill C-309 specifically concerned unlawful assemblies, those providing context and justification for this legislation largely overlooked the legal definitions of these events. At the final Senate readings, Chief Chu attempted to disentangle these ideas and appease concerns.

I will distinguish the different public order events, because there seems to be some discussion about whether a legitimate protest is a hockey riot, and I want to distinguish why we treat them differently [...] In Vancouver there are two or three events every week, I know in Ottawa there are several events almost daily, and the vast majority of protests end peacefully. We know that and we cherish the rights of people to protest. Recent examples include the Occupy Movement across Canada, Idle No More, where there have been times the police have been criticized for facilitating the protest too much and not taking action. Sometimes protests become

illegal and they happen in one of two ways. First, the legitimate protest is hijacked by a smaller group of people who use the cover of large numbers of people and they will use that event to commit crime. They are the anarchist types or will create an event specifically to shield their anarchist objectives in terms of wanting to commit crimes.

(Canada, Parliament, Standing Senate Committee on Legal and Constitutional Affairs, 2013)

With this statement, Chief Chu highlighted instances of protest control to signify his support for social movements and protest. However, by homogenizing how Canadian police handled the Occupy Movement or Idle No More, he not only obscured practices of private policing used during these events, but he also highlighted the far reaching scope of the legislation. Like others, Chief Chu rewrote and recontextualized events to justify the legislation. This hollow show of support for protests permeated his discussion of 'legitimate' versus 'illegitimate' protests. While he attempted to distinguish between this dichotomy, the discursive practices he employed once again connected them – by placing them on a linear escalating scale. He maintained that sometimes legitimate protest or peaceful assemblies become illegitimate and are unlawful assemblies and riots. Due to the 'threat of masked anarchists', any protest had the potential to become unlawful.

Chief Chu's testimony served to distinguish between protests and riots, yet simultaneously connected them by applying the notion of discretion – 'there is quite a bit of discretion applied in both of those circumstances [road blocks and sit-ins] because the Charter allows people to assemble in a peaceful manner' (Canada, Parliament, Standing Senate Committee on Legal and Constitutional Affairs, 2013). Critics, notably Michael Spratt, a defence council lawyer, challenged the role of police discretion by questioning training, identification, and implementation. When responding to these questions, rather than providing practical evidence, Chief Chu spoke at a hypothetical and speculative level. He cited training, official procedure, existing legislation, and the courts as effective means of protecting people. Chief Chu concluded his lengthily testimony stressing that he was confident that 'defense lawyers [would be] capable of presenting arguments that would convince a judge that the person [had] a legitimate and lawful reason for wearing a mask' (Canada, Parliament, Standing Senate Committee on Legal and Constitutional Affairs, 2013). In doing so, the onus was once again placed on the defence to later determine what is 'lawful excuse'.<sup>7</sup>

As had occurred frequently during the legislative debate of Bill C-309, previous Canadian criminal justice proceedings and outcomes were ignored. Chief Chu failed to acknowledge that in instances of large-scale protest such as the 2010 Vancouver Olympic Games or the 2010 Toronto G20 Summit, police forces from around the province and country were brought together and trained by Canadian Security Intelligence Service and Joint Integrated Task Forces (Lamb, 2012; Monaghan & Walby, 2012b). These agencies, rather than briefing officers on rights and freedoms or other due process laws, focused on threat

assessments and paramilitary crowd control tactics. The addition of anti-masking law to these forms of control illuminates the scope and nature of 'discretion'. Furthermore, by rewriting historical events, Chief Chu failed to address paramilitary crowd control tactics, such as kettling and mass arrests, which have been used increasingly at protests and demonstrations (Canadian Civil Liberties Association, 2010). These tactics have been used to criminalize, but also to obstruct and curtail dissenting activities (Fernandez, 2008; Starr & Fernandez, 2009). Similarly, these tactics inform court decisions, and the limited power of the courts to protect civil liberties has been well documented in cases of political dissent (Barkan, 2006; Esmonde, 2003; O'Toole, 2011; Yang, 2011).

While the full power of Bill C-309 has yet to be realized, Chief Chu's final testimony to the Senate, alluded to the far-reaching powers and scope of this legislation.

If it's a dual offence we have the ability to arrest and nip that issue in the bud early on to prevent all the other crimes from occurring, which we have seen in certain circumstances across our country. We believe that this is a tool that will be very helpful. Also unlawful assembly is a summary offence, but if we create this offence which is dual, which means indictable or summary, we can fingerprint and create a criminal record, which is difficult to do in the summary offence because you cannot fingerprint under the Identification of Criminals Act.

(Standing Senate Committee on Legal and Constitutional Affairs,  
24 April 2013)

Masking as an indictable offence would not only expand police powers of discretion, but also enable the targeting of specific and constructed groups – anarchists in particular. Through these policing mechanisms, populations deemed hostile are met with a multiscale 'toolkit' of control – techniques to maintain and secure the status quo – while simultaneously being stripped of the right to freedom of assembly and expression. The making of Bill C-309 highlights how discourses are employed and recontextualized to criminalize dissent. Rather than criminalizing an action – that is, the wearing of a mask – the bill more problematically widens the net, capturing populations both violating and adhering to the written law.

### **Violating anti-masking law: making the criminal, invoking the anarchists**

By focusing discussions on violence, safety, and property, issues of rights and freedoms were dismissed in favour of pre-emptive crime control. This dismissal was predicated on the construction and homogenization of protestors and rioters based on public, police and private industry perceptions. In an early email to Chief Chu, Chief Graham explained the rationale underlying his support for anti-masking legislation. He stated, 'I think a charge would address the pinhead

anarchist types that show up for protests, to the B&E artists who smash and grab at night with a mask so the store security doesn't catch up to them' (Doc20, 21 June 2011). This 'anarchist-as-security-threat' logic intensified after the Bill was introduced in the House of Commons. Drawing on Graham's early emails and telephone conversations, a press release from MP Richards cemented a potent narrative that targeted 'anarchist groups' and justified their immediate confinement and criminalization.

Police have seen it time and time again, individuals with their faces concealed mixing into a group and then instigating riotous behaviour, such as throwing objects at police, tossing marbles under the legs of police horses to trip them up, or covering up their faces before smashing windows, setting fires, stealing, assaulting people or flipping over vehicles. These individuals then remove their facial coverings and slip away in the confusion, some never to be apprehended. It is vexing for police and dangerous for the public to see such individuals escape the consequences of their actions.

(Richards, 2011b)

This account capitalized on sensationalized media images and, in so doing, decontextualized events. Once again, vivid imagery was used to justify the legislation. As MP Richards discussed the 2010 Toronto G20 protests, he stated that 'These thugs began maliciously destroying vehicles and buildings with previously hidden weapons that they brought for just that purpose. Hammers, flagpoles, mailboxes and even chunks of the street were used to cause as much damage as possible' (Richards, 2012). These accounts were echoed in Chief Graham's testimony.

Civil disturbances happen from time to time and I am sure they will continue to occur. But what is most concerning is when these disturbances become something worse, something more nefarious. Often a disturbance deteriorates into a violent riot because of the actions of a very few people. Indeed, over the past few decades a common pattern has emerged relating to how and why riots occur. Typically, at a certain point people within protests or assemblies don masks and other facial coverings and begin vandalizing property, hurling objects and sometimes assaulting police officers [...] This strategy has been adopted on a global basis among like-minded protestors who use the same tactics of concealing their identity, committing unlawful acts, and then shedding masks and facial coverings to blend in with larger group of lawful citizens.

(Canada, Parliament. Standing Committee on Justice and Human Rights, 2012a)

With this conclusion, Chief Graham effectively painted all mask-donning protestors with a thick veneer of illegality, suggesting that lawful citizens' have

nothing to hide. In other words masks, in the broadest legal meaning, at an unlawful assembly or riot, can never be lawful. Not only does anti-masking legislation stultify the possibility of recovering any redeeming qualities of wearing a mask at protests, it ostracizes and exaggerates mask-wearing protestors as fanatical extremists dead-set on committing destruction.

Anarchists, and the politically violent ideology they supposedly espouse, became the subjects of a mounting and potent criminalizing narrative. However, this narrative was predicated on larger existing discourses in Canada and globally. Specifically, mainstream media, and various levels of government have long played an active role in the misrepresentation of anarchist politics and the framing of social problems (Juris, 2005; McFarlane & Hay, 2003; Murdock, 1973; Rosie & Gorringer, 2009). Furthermore, this role has hinged on the multiscalar interoperability of local police, and state security intelligence (Monaghan & Walby, 2012b). Since 2009, CSIS and Joint Intelligence Groups (JIGs) have circulated definitions and ways of identifying anarchists (Monaghan & Walby, 2012b). Contemporary intelligence practices have increased suspicion and justified sweeping repressive control in the name of order, security, and liberty. With the creation of Canadian anti-masking law these ideas were transmuted into pre-emptive legislation, thereby giving law enforcers broad discretionary powers to justify the targeting and control of supposed anarchists – or whoever else could be constructed as a threat.

The making of anti-masking law aligned existing discourses of violence and political dissent in order to justify pre-emptive control. The concerted statements given by police chiefs, MPs and public-private stakeholders, conveyed masks a convenient way of identifying the constructed other – the illegal, unlawful dissenter. Masks – now an indicator of violent intent and unlawful behaviour – justify and reinforce paramilitary policing and containment tactics such as mass detention and arrest. By making the wearing of masks at unlawful assemblies or riots an indictable offense, criminal records can be created and masked dissenters are countable, placed in databases, tracked and a ‘history’ created. Under Bill C-309, simply being at an unlawful assembly exposes dissenters to capture. Those present are now captured – not only in physical kettles and subject to mass detention and arrested – but they are also prepared for capture by surveillance practices and biometric technologies.

### **Adhering to anti-masking law: making the surveillance-ready-subject**

The culmination of discussions and debate over Bill C-309 centred on violence, anarchists and the need for pre-emptive control; discussions that ultimately served to criminalize the wearing of a mask while simultaneously anticipating the unmasked dissenter – the surveillance-ready-subject. Dissenters choosing to don a mask may face arrest and the collection of biometric data, in the form of a criminal record; however, if they chose not to wear a mask, they leave their face exposed to biometric technologies and facial recognition systems.

As alluded to by Chief Chu, under *The Identification of Criminals Act*, Bill C-309 enables police to build databases of biometric information – databases of ‘anarchists’, ‘protestors’ and anyone else captured in a visual or physical kettle. However, these databases have already been built and the police already have access to them. As demonstrated by the *Vancouver Riot 2011 Integrated Riot Identification Team* or the *G20 Most Wanted List*, not only do police already have cameras and proxy access to ‘databases’, they also have vigilant citizens ready and willing to perform lateral surveillance (Andrejevic, 2002).

In the aftermath of the riots, the VPD gathered footage from closed-circuit television cameras (CCTV) installed for the 2010 Winter Olympics, and used various social networking sites to gather images of offenders (Rieti, 2011). The maxim, ‘they destroyed our City, they are not Canucks, and they must pay’ solidified a potent patriotic discourse embroiled in neoliberal logics of the governance of self and others. This sentiment, echoed in the private communications of police Chiefs Graham and Chu, eventually became a driving force behind the creation of Bill C-309. Thousands scoured social media platforms, as well as the Vancouver Police Department’s *Help Identify Suspects* page, to upload images and/or verify the identities of their family members, friends and neighbours. After the Toronto G20 Summit Protests, the Toronto Police Service (TPS) partnered with police in other jurisdictions, the public, and businesses to help identify their most wanted protestors. In addition to thousands of photos sent in by the public, the TPS was also offered facial recognition software from major banks and Passport Canada in order to identify persons of interest (CTV News, 2011).

Given the proliferation of CCTV, smart phones and the adoption of body cameras, actively or passively, the dissenter may likely be captured and presented to the system. As evidenced by the routine use of this technique after riots, protests and mega sporting events, facial recognition systems can operate unnoticed and retroactively, as subjects are not required to present themselves – capture is not consensual (Introna & Wood, 2003). By using artificial intelligence and machine learning algorithms, the captured image is turned into a template and a standardized data portrait (Pugliese, 2010). As a template, the subject is no longer a whole body; instead, the face becomes a scattered body bit – a synecdoche of the subject – a digital trace interpreted as fixed, unchanging and synonymous with the identity of the person (Aas, 2006). Like a criminal record, this template is retained for future use, whatever that might be. Biometrics capture, break and remould the body, enrolling it across complex political, social and legal networks. In doing so, a subject’s scattered fragments are vulnerable to abstraction (Monahan, 2009), and stripped of their position. Dissenters have a new truth written on them. Biometrics exemplify the post-biological, as subjects are unable to govern or control the dispersal of their ‘body bits’ (Pugliese, 2010). In the hands of others, the subject loses control of what their face says or means. Their body does not lie, as they are captured and placed in a certain time, space and truth.

This form of capture further individualizes, decontextualizes, and de-radicalizes the dissenter. The now surveillance-ready-subject is dividuated and

disciplined into a database (Poster, 1996), stripped not only of a mask but also of politics, the ability to resist, and public invisibility. Biometric technologies are ‘power without narrative’ (Aas, 2005); however, biometrics also result in a political narrative without power (Ajana, 2013). The surveillance-ready-subject – as prepared by anti-masking law – faces new forms of capture and exposure. Regardless of the intent behind masking, its criminalization extends police power to the subject’s appearance. This intrusion serves to promote fear – the fear of wearing a mask and therefore being physically captured, or the fear of being exposed, un-masked and visually captured. Often viewed as a way of exercising autonomy and anonymity, masking and the political narrative and space it creates have been seized.

The riot squad, masked behind helmets and Kevlar, represents the legitimate masked citizen. These increasing powers of intimidation alter who can afford to be seen, who is willing to speak, what they are willing to say, and where they are willing to say it. Without a mask, the voice, body and subject are more easily decontextualized leaving facial recognition systems to determine events. Politics as a space and discursive practice is increasingly narrowed. Through these intimidating and decontextualizing practices, anti-masking law silences the body. In doing so, it limits narratives and statements, in a sense, ordering and predetermining what can be said or done. While claiming to separate the lawful and unlawful dissenter, the provisioning of the surveillance-ready-subject calls into question *lawful* dissent.

## Conclusion

What started out as a policy recommendation created by police days before the Vancouver Stanley Cup Riot, eventually became an Act to amend the Criminal Code of Canada, Bill C-309. While critics initially raised issues concerning rights and freedoms, these were quickly dismissed throughout legislative debates by presenting masking as a threat to safety and security.

Anti-masking legislation was formally conceived as a means of protecting the properly behaving protestors, ‘the public’ and private property. By entangling discussions of protests, riots and unlawful assemblies, the question became: how do we prevent violent crimes during these events? The solution was simple – stop the anarchists and you will be able to prevent unlawful assemblies. This statement – repeated throughout the legislative proceedings – was predicated on existing discourses that conflated anarchy with violence, ultimately serving to criminalize the actions of social movements more broadly. Masks became a signifier of violence and a way of targeting the populations supposedly responsible for the violent crimes at public demonstrations. By criminalizing masks and giving police a tool to justify the surveilling and biometric collection of specific populations, anti-masking law promised to prevent events such as the 2010 G20 Summit protests and the 2011 Stanley Cup riots. However, the scope of anti-masking law is much broader: it assembles and prepares the public as

surveillance-ready-subjects. By criminalizing practices of masking and public invisibility, even lawful dissenters are effectively captured through pre-emptive surveillance practices.

Going forward, it might even be said that Bill C-309 optimizes not only subjects but also the law. As facial recognition software becomes more common, the alignment between these technologies – biometrics and the law – will require further negotiation and adjustment. However, laws are not wholly deterministic; at the time of writing, protestors in Canada are still wearing masks, and a provincial court has repealed a Canadian anti-masking bylaw on constitutional grounds (Bruemmer, 2016). And yet anti-masking legislation has become another of the many tools in the policeman’s tool kit. To better understand the ways in which this law shapes and is shaped by the political landscape of social movements and protests, more research uncovering the application, use and implications of anti-masking law are needed.

## Notes

- 1 The research reported here is part of a larger project ‘The Criminalization of Political Dissent: A critical discourse analysis of Occupy Vancouver and Bill C-309’ funded by the Canadian Social Science and Humanities Research Council. More details about the project can be found at: <http://summit.sfu.ca/item/14486>.
- 2 For consistency across work drawing upon these ATI and FOI documents, I have employed the following codes: Doc20–34 = File number2013–0496 Victoria Police Department and Doc25 = File number13–3092A Vancouver Police Department.
- 3 The Victoria Police Department research consisted largely of personal testimony, a collection of publicly accessible documents including an assortment of new media articles from United Kingdom, France, and the Ukraine, Wikipedia entries, United Kingdom *Hansards*, United States case law, and American legal reviews.
- 4 Data for this project consisted of numerous Access to Information and Freedom of Information releases from the Victoria Police Department, the Vancouver Police Department, the Department of Justice, and the City of Montreal, as well as smaller requests to the Royal Canadian Mounted Police, Canadian Security Intelligence Service, Privy Council, Toronto Police Services, Public Safety Canada, and the City of Montreal between 2008–2013. Data were analysed using Critical Discourse Analysis (Fairclough, 2003; Wodak & Meyer, 2009), in order to examine argumentation schemes (specifically disjunctions, recontextualization, and semiosis), and the construction of social actors and criminality, in the production of pre-emptive control discourses.
- 5 In response to the 2012 Quebec student protests, anti-masking law was included in Montreal’s controversial P6-bylaw. At the time of writing this chapter, the Quebec Superior Court ruled that the anti-masking component of this measure, among others, was unconstitutional (Bruemmer, 2016; Pindera, 2016).
- 6 NDP MP Craig Scott, stressed,

In the interest of time, I think it also important to note that the words ‘tool’ and ‘toolkit’ have been used a lot in the testimony, that this would give the police a tool. Sure, but some of the examples of what that tool will allow them to do have been worrying.

(Canada, Parliament. Standing Committee on Justice and Human Rights, 2012b)

7 Throughout the debate, little information was provided about what would be considered a lawful excuse. In an early resolution written by Chief Graham he stated

the law would not target those that have legitimate use for facial coverings for religious, celebratory (face painting) or medial purposes. The arrest and prosecution of offenders with the subsequent collection of evidence can be enhanced when mask and disguises are not permitted. If evidence exists that a person is masked or disguised during a protest, gathering or riot the onus should be on that person to explain why it was necessary to have their face disguised or masked.

(Doc28, 27 September 2011)

## References

- Aas, K. F. (2005). Getting ahead of the game: Border technologies and the changing space of governance. In E. Zureik & M. Salter (Eds), *Global surveillance and policing. Borders, security, identity* (pp. 194–214). Portland: Willan Publishing.
- Aas, K. F. (2006). 'The body does not lie': Identity, risk and trust in technoculture. *Crime, Media, Culture*, 2(2), 143–158.
- Ajana, B. (2013). *Governing through biometrics*. New York: Palgrave Macmillan.
- American Civil Liberties Union. (2000). With a 'hi-oh, silver!' ACLS challenges Michigan anti-mask law on behalf of 'lone ranger' protesters. 18 October. Retrieved from: [www.aclu.org/news/hi-oh-silver-aclu-challenges-michigan-anti-mask-law-behalf-lone-ranger-protesters?Redirect=free-speech/hi-oh-silver-aclu-challenges-michigan-anti-mask-law-behalf-lone-ranger-protesters](http://www.aclu.org/news/hi-oh-silver-aclu-challenges-michigan-anti-mask-law-behalf-lone-ranger-protesters?Redirect=free-speech/hi-oh-silver-aclu-challenges-michigan-anti-mask-law-behalf-lone-ranger-protesters).
- Andrejevic, M. (2002). The work of watching one another: Lateral surveillance, risk, and governance. *Surveillance & Society*, 2(4), 251–270.
- Barkan, S. (2006). Criminal prosecution and the legal control of protest. *Mobilization*, 11(1), 181–194.
- Blas, Z. (2013). Escaping the face: biometric facial recognition and the facial weaponization suite. *Journal of the New Media Caucus*. Retrieved from <http://median.newmediacaucus.org/caa-conference-edition-2013/escaping-the-face-biometric-facial-recognition-and-the-facial-weaponization-suite/>.
- Bill C-309: *Preventing persons from concealing their identity during riots and unlawful assemblies act* (2011). First reading 3 October 2011, 41st Parliament, first session. Retrieved from [www.parl.gc.ca/LEGISinfo/BillDetails.aspx?billId=5136691&Language=E&Mode=1](http://www.parl.gc.ca/LEGISinfo/BillDetails.aspx?billId=5136691&Language=E&Mode=1).
- Boyle, P. & Haggerty, K. D. (2009). Spectacular security: Mega-events and the security complex. *International Political Sociology*, 3(3), 257–274.
- Bruemmer, R. (2016). Quebec court rules P-6 law barring masks, requiring itineraries of protests is illegal. *Montreal Gazette*, 22 June. Retrieved from <http://montrealgazette.com/news/local-news/quebec-court-rules-p-6-law-barring-masks-requiring-itineraries-of-protests-is-illegal>.
- Canada, Parliament. House of Commons. Standing Committee on Justice and Human Rights (2012a). *Evidence*. Meeting 33, May 1. 41st Parliament, first session. Retrieved from [www.parl.gc.ca/HousePublications/Publication.aspx?DocId=5538786&Language=E&Mode=1&Parl=41&Ses=1](http://www.parl.gc.ca/HousePublications/Publication.aspx?DocId=5538786&Language=E&Mode=1&Parl=41&Ses=1).
- Canada, Parliament. House of Commons. Standing Committee on Justice and Human Rights (2012b). *Evidence*. Meeting 35, May 8. 41st Parliament, first session. Retrieved from [www.parl.gc.ca/HousePublications/Publication.aspx?DocId=5563117&Language=E&Mode=1&Parl=41&Ses=1](http://www.parl.gc.ca/HousePublications/Publication.aspx?DocId=5563117&Language=E&Mode=1&Parl=41&Ses=1).

- Canada, Parliament. Standing Senate Committee on Legal and Constitutional Affairs (2013). *Evidence*. Meeting 81, 24 April. 41st Parliament, first session. Retrieved from [www.parl.gc.ca/Content/SEN/Committee/411/lcjc/34ev-50091-e.htm?Language=E&Parl=41&Ses=1&comm\\_id=11](http://www.parl.gc.ca/Content/SEN/Committee/411/lcjc/34ev-50091-e.htm?Language=E&Parl=41&Ses=1&comm_id=11).
- Canadian Broadcast Corporation News. (2011). Police chiefs back anti-mask bill. 24 November. Retrieved from: [www.cbc.ca/news/canada/police-chiefs-back-anti-mask-bill-1.1061197](http://www.cbc.ca/news/canada/police-chiefs-back-anti-mask-bill-1.1061197).
- Canadian Civil Liberties Association. (2010). *Breach of the peace: A preliminary report of observations during the 2010 G20 summit*. 29 June. Retrieved from <http://ccla.org/word-press/wp-content/uploads/2010/06/CCLA-G-20-INTERIM-REPORT-A-Breach-of-the-Peace-June-29-2010.pdf>.
- Canadian Criminal Code*, R.S.C. 1985, c.46, s.351.
- Council of the District of Columbia. (2010). *Residential Tranquility Act of 2010*. Retrieved from: <https://beta.code.dccouncil.us/dc/council/laws/docs/18-374.pdf>.
- CTV News. (2011). Toronto police seek identities of some G20 protesters. *CTV News*, 7 July. Retrieved from <http://toronto.ctvnews.ca/toronto-police-seek-identities-of-some-g20-protesters-1.530096>.
- Doll, J. (2011). 150-year-old law against wearing masks used to arrest Wall Street demonstrators. *The Village Voice*, 21 September. Retrieved from [http://blogs.villagevoice.com/runninscared/2011/09/occupy\\_wall\\_str\\_2.php](http://blogs.villagevoice.com/runninscared/2011/09/occupy_wall_str_2.php).
- Esmonde, J. (2003). Bail, global justice, and the limits of dissent. *Osgoode Hall Law Journal*, 41(3), 323–361.
- Fairclough, N. (2003). *Analyzing discourse: Textual analysis for social research*. New York: Routledge.
- Fernandez, L. (2008). *Policing dissent: Social control and the anti-globalization movement*. London, UK: Rutgers University Press.
- Gardiner, S. & Firger, J. (2011). Rage charge is unmasked. *Wall Street Journal*, 20 September. Retrieved from: [www.wsj.com/article\\_email/SB10001424053111904194604576581171443151568-1MyQjAxMTAxMDIwMDEyNDYyWj.html](http://www.wsj.com/article_email/SB10001424053111904194604576581171443151568-1MyQjAxMTAxMDIwMDEyNDYyWj.html).
- Harbisher, B. (2016). The million mask march: Language, legitimacy, and dissent. *Critical Discourse Studies*, 1–16.
- Introna, L., & Wood, D. (2002). Picturing algorithmic surveillance: The politics of facial recognition systems. *Surveillance & Society*, 2(2/3), 177–198.
- Juris, J. S. (2005). Violence performed and imagined militant action, the Black Bloc and the mass media in Genoa. *Critique of Anthropology*, 25(4), 413–432.
- Kaminski, M. (2013). Real masks and real name policies: Applying anti-mask case law to anonymous online speech. *Fordham Intellectual Property, Media & Entertainment Law Journal*, 23, 815–896.
- Korean Herald*. (2015). [Editorial] Anti-mask bill: Rallies should be held free of violence. 27 November. [www.koreaherald.com/view.php?ud=20151127000876](http://www.koreaherald.com/view.php?ud=20151127000876).
- Lamb, N. (2012). *The pacification of radical dissent: An anti-security analysis of the Toronto G20 Joint Intelligence Group*. (Unpublished master's thesis.) Carleton University Ottawa, Ontario.
- Leman-Langlois, S. (2008). *Technocrime: Technology, crime and social control*. London: Willan Publishing.
- Lou, Y. (2016). Government urged to consider anti-masking law. *Rethink Hong Kong*, 2 February. Retrieved from: <http://news.rthk.hk/rthk/en/component/k2/1242476-20160216.htm>.

- Mackinnon, D. (2014). The criminalization of political dissent: A critical discourse analysis of Occupy Vancouver and Bill C-309. (Unpublished master's thesis.) Simon Fraser University, Burnaby, British Columbia.
- Marx, G. (2003). A tack in the shoe: Neutralizing and resisting the new surveillance. *Journal of Social Issues*, 59(2), 369–390.
- McCarthy, J. D. & McPhail, C. (1998). The institutionalization of protest in the United States. In *The social movement society: Contentious politics for a new century*, Lanham, MD: Rowman & Littlefield Publishers.
- McFarlane, T. & Hay, I. (2003). The battle for Seattle: Protest and popular geopolitics in The Australian newspaper, *Political Geography*, 22, 211–232.
- Mills, D. (2010). Denmark: Police brutalise climate protesters. *Green Left Weekly*, 23 January. Retrieved from [www.greenleft.org.au/content/denmark-police-brutalise-climate-protesters](http://www.greenleft.org.au/content/denmark-police-brutalise-climate-protesters).
- Molnar, A. & Snider, L. (2011). Unpacking the Vancouver 2010 security development-nexus. In C. Bennett & K. Haggerty (Eds) *Security games: Surveillance and control at mega-events*. New York: Routledge.
- Monahan, T. (2009). Dreams of control at a distance: Gender, surveillance, and social control. *Cultural Studies ↔ Critical Methodologies*, 9(2), 286–305.
- Monahan, T. (2015). The right to hide? Anti-surveillance camouflage and the aestheticization of resistance. *Communication and Critical/Cultural Studies*, 12(2), 159–178.
- Monaghan, J. & Walby, K. (2012a). 'They attacked the city': Security intelligence, the sociology of policing and the anarchist threat at the 2010 Toronto G20 summit. *Current Sociology*, 22(2), 133–151.
- Monaghan, J. & Walby, K. (2012b). Making up 'terror identities': Security intelligence, Canada's Integrated Threat Assessment Centre and social movement suppression. *Policing and Society*, 60(5), 653–671.
- Moynihan, C. (2012). Law banning masks at protest is to be challenged. *New York Times*, 21 October. Retrieved from [www.nytimes.com/2012/10/22/nyregion/rule-forbidding-masks-at-protests-is-to-be-challenged.html?\\_r=0](http://www.nytimes.com/2012/10/22/nyregion/rule-forbidding-masks-at-protests-is-to-be-challenged.html?_r=0).
- Murdock, G. (1973). Political deviance: The press presentation of a militant mass demonstration. In S. Cohen & J. Young (Eds) *The manufacture of news: Social problems, deviance and the mass media*. London: Constable.
- Nail, T. (2013). The politics of the mask. *Huffington Post*, 11 December. Retrieved from [www.huffingtonpost.com/thomas-nail/the-politics-of-the-mask\\_b\\_4262001.html](http://www.huffingtonpost.com/thomas-nail/the-politics-of-the-mask_b_4262001.html).
- Neocleous, M. & Rigakos, G. (Eds). (2011). *Anti-security*. Ottawa, ON: Red Quill Books.
- Neyland, D. (2006). *Privacy, surveillance and public trust*. New York: Palgrave Macmillan.
- O'Leary, E. & Gonzáles, A. (2013). Spain's anti-protest bill criticized as anti-democratic. *Reuters*. 29 November. [www.reuters.com/article/us-spain-security-idUSBRE9AS0MX20131129](http://www.reuters.com/article/us-spain-security-idUSBRE9AS0MX20131129).
- O'Toole, M. (2011). Advocating vandalism nets woman 10 months. *National Post*, 21 December. Retrieved from [www.nationalpost.com/](http://www.nationalpost.com/).
- Perry, K. M. E. & Kang, H. H. (2012). When symbols clash: Legitimacy, legality and the 2010 Winter Olympics. *Mass Communication and Society*, 15(4), 578–597.
- Pindera, L. (2016). Quebec Superior Court strikes down Montreal's ban on masked protesters. *CBC News*, 22 June. Retrieved from [www.cbc.ca/news/canada/montreal/anarchopanda-mask-ban-protests-p6-unconstitutional-1.3647684](http://www.cbc.ca/news/canada/montreal/anarchopanda-mask-ban-protests-p6-unconstitutional-1.3647684).
- Poster, M. (1996). Databases as discourse. In D. Lyon & E. Zureik (Eds), *Computers, surveillance, & privacy*. Minneapolis, MN: University of Minnesota Press.

- Pugliese, J. (2010). *Biometrics: Bodies, technologies, biopolitics*. London, UK: Routledge.
- Rafail, P. (2010). Asymmetry in protest control? Comparing protest policing patterns in Montreal, Toronto, and Vancouver, 1998–2004. *Mobilization*, 15(4), 489–509.
- Richards, B. (2011a). Bill C-309, An Act to amend the Criminal Code. Canada. Parliament. House of Commons. 3 October. *Edited Hansard 146(25)*. 41st Parliament, first session. Retrieved from [www.parl.gc.ca/HousePublications/Publication.aspx?Pub=Hansard&Doc=25&Parl=41&Ses=1&Language=E&Mode=1](http://www.parl.gc.ca/HousePublications/Publication.aspx?Pub=Hansard&Doc=25&Parl=41&Ses=1&Language=E&Mode=1).
- Richards, B. (2011b). Bill C-309, An Act to amend the Criminal Code. Canada. Parliament. House of Commons. 17 November. *Edited Hansard 146(48)*. 41st Parliament, first session. Retrieved from [www.parl.gc.ca/HousePublications/Publication.aspx?Pub=Hansard&Doc=48&Parl=41&Ses=1&Language=E&Mode=1](http://www.parl.gc.ca/HousePublications/Publication.aspx?Pub=Hansard&Doc=48&Parl=41&Ses=1&Language=E&Mode=1).
- Richards, B. (2012). Bill C-309, An Act to amend the Criminal Code. Canada. Parliament. House of Commons. 29 October. *Edited Hansard 146(171)*. 41st Parliament, first session. Retrieved from [www.parl.gc.ca/HousePublications/Publication.aspx?Pub=Hansard&Doc=171&Parl=41&Ses=1&Language=E&Mode=1](http://www.parl.gc.ca/HousePublications/Publication.aspx?Pub=Hansard&Doc=171&Parl=41&Ses=1&Language=E&Mode=1).
- Rieti, J. (2011). Vancouver riot photos spark identity probe. *CBC News*. 17 June. Retrieved from [www.cbc.ca/news/canada/vancouver-riot-photos-spark-identity-probe-1.1000084](http://www.cbc.ca/news/canada/vancouver-riot-photos-spark-identity-probe-1.1000084).
- Rosie, M. & Gorringer, H. (2009). 'The anarchists' world cup': Respectable protest and media panics. *Social Movement Studies*, 8(1), 35–53.
- RT (2014). Ukraine parliament repeals controversial anti-protest laws. *CTV News*, 28 January. Retrieved from [www.rt.com/news/ukraine-parliament-protest-law-289/](http://www.rt.com/news/ukraine-parliament-protest-law-289/).
- Ruiz, P. (2013). Revealing power masked protest and the blank figure. *Cultural Politics*, 9(3), 263–279.
- Seiden, D. (2015). Putting a face to a name. *Gazette magazine: New technology*. Retrieved from: [www.rcmp-grc.gc.ca/en/gazette/putting-name-face](http://www.rcmp-grc.gc.ca/en/gazette/putting-name-face).
- Simoni, S. J. (1992). Who goes there: proposing a model anti-mask act. *Fordham Law Review*, 61(1), 241–272.
- St John, G. (2008). Protestival: Global days of action and carnivalized politics in the present. *Social Movement Studies*, 7(2), 167–190.
- Starr, A. & Fernandez, L. (2009). Legal control and resistance post-Seattle. *Social Justice*, 36(1), 41–60.
- Szerszynski, B. (1999). Performing politics: The dramatics of environmental protest. In L. Ray & A. Sayer (Eds), *Culture and economy after the cultural turn*. London: Sage.
- Wodak, R. & Meyer, M. (2009). Critical discourse analysis: History, agenda, theory and methodology. In R. Wodak & M. Meyer (Eds), *Methods of critical discourse analysis*. Thousand Oaks, CA: Sage.
- Yang, J. (2011). Accused G20 ringleaders challenge bail conditions. *Toronto Star*, 23 June. Retrieved from [www.thestar.com/news/gta/g20/2011/06/23/accused\\_g20\\_ringleaders\\_challenge\\_bail\\_conditions.html](http://www.thestar.com/news/gta/g20/2011/06/23/accused_g20_ringleaders_challenge_bail_conditions.html).