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Examination of Senator Brazeau's Primary and Secondary Residence Status

The Senate of Canada



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Deloitte LLP 800 - 100 Queen Street Ottawa ON K1P 5T8 Canada

Tel: 613-751-5378 Fax: 613-563-2244 www.deloitte.ca

May 7, 2013

Senator Elizabeth Marshall Chair, Subcommittee on Living Allowances The Senate of Canada Parliament Buildings Ottawa ON K1A 0A4

Dear Senator Marshall,

Subject: Review of Senator Brazeau's Primary and Secondary Residence Status

Attached is our report setting out the findings from our review. Our findings are based on procedures completed as described in section 1.2 of this report and are subject to the scope, limitations in scope and restrictions as set out in section 3 of this report.

Should you have any questions or concerns, please do not hesitate to contact me at 613-751-5378.

Yours very truly,

Subitte LLP

Gary Timm, CA·IFA, CFE Partner, Financial Advisory Deloitte LLP

Alan Stewart, CA·IFA Partner, Financial Advisory Deloitte LLP

c: Senator Gérald Comeau Senator Larry W. Campbell

1. Background

1.1. Background

The Senate of Canada recognizes that travel is a necessary component of senators' parliamentary functions. Parliamentary functions are typically carried out in Ottawa and senators must travel to and from their primary residences in order to attend Senate sittings and committee meetings. Parliamentary functions are also carried out in senators' regions and, from time-to-time, senators may be required to travel to other locations, both within Canada and internationally, in the service of the Senate. Senators who come to Ottawa to carry out their parliamentary functions and who are more than 100 kilometres from their primary residence when in Ottawa are on travel status in the National Capital Region ("NCR") and are entitled to be reimbursed for living expenses in the NCR. Senators claim their office and travel expenses in compliance with the *Parliament of Canada Act* and internal rules and policies of the Senate.

Following media reports with respect to Senator Patrick Brazeau's ("Senator Brazeau") claims for a living allowance in the NCR, the Senate appointed a bipartisan subcommittee on November 22, 2012, comprised of three members and chaired by Senator Marshall, to inquire into and report on all matters relating to living allowances in the NCR related to Senator Brazeau.

1.2. Retainer

Deloitte LLP ("Deloitte") was retained by the Senate of Canada ("Senate") in order to undertake an examination of Senator Brazeau's living allowance expense claims, including an assessment of his primary and secondary residency status.

Specifically, Deloitte has been asked by the Senate subcommittee to complete an independent third party examination and assessment of the appropriateness of Senator Brazeau's travel and living allowance expense claims and to report on any funds that may be owing to the Receiver General as a result of inappropriate claims, if any. More specifically, we have been asked to undertake the following:

- Examination of the travel claims and supporting documentation,
- For claims related to travel to/from a primary residence, assess and determine whether this occurred or could have occurred,
- · Assess where the primary residence is located for Senator Brazeau, and
- Categorize the claims as either:
 - o Appropriate in keeping with Senate practice,
 - o Subject to reimbursement to the Receiver General, or
 - Subject to interpretation and determination by the Standing Committee on Internal Economy, Budgets and Administration ("Standing Committee").

The examination period for this engagement is from April 1, 2011 to September 30, 2012. Earlier and subsequent claims by Senator Brazeau have not been included in this examination.

2. Summary of findings

2.1. Framework and guidelines related to Senators' residency and allowances

- 1. Senators, whose "primary residence" is located more than 100 kilometres from the NCR, are entitled to a reimbursement of travel expenses, and a reimbursement of living expenses, while in the NCR for Senate business.
- There is a lack of clarity in the terminology used for the different residences mentioned or discussed in the applicable regulations and guidelines. The following terms are used without being clearly defined: primary residence, secondary residence, NCR residence, provincial residence. In addition, the term registered residence is not defined.
- 3. The regulations and guidelines applicable during the period of our examination do not include criteria for determining "primary residence". As such, we are not able to assess the status of the primary residence declared by Senator Brazeau against existing regulations and guidelines.

2.2. Assessment of Senator Brazeau's Primary Residence Location

 Based on the documentation provided, it appears that Senator Brazeau spent approximately 81% (443 nights) of his time in Ottawa (for Senate business or other) during the period of our examination. Senator Brazeau has indicated that while in Ottawa, he works on Senate business, documented or not, five days per week. Senator Brazeau spent 57 nights, plus 13 identified day trips, of the 549 days in the period of our examination at his primary residence. We have set out a breakdown of our assessment in the table below.

| End of Day Location of Senator Brazeau | Number of Days | % | |
|--|------------------------|------|--|
| Ottawa – Senate Business | 77 ¹ | 14% | |
| Other locations – Senate Business | 9 | 2% | |
| Total Senate Business | 86 | 16% | |
| Ottawa – activity undocumented | 317 | 58% | |
| Ottawa – day before or after Senate Business | 50 | 9% | |
| Declared Primary Residence (plus 13 identified day trips) | 57 | 10% | |
| Other locations – activity undocumented | 12 | 2% | |
| Unknown | 27 | 5% | |
| Total | 549 | 100% | |

Table 1: Summary of Senator Brazeau's Location

- 2. We have assessed that the twenty-eight (28) claimed trips between Maniwaki and Ottawa/Gatineau by Senator Brazeau during the period of examination did take place or could have taken place.
- 3. We identified one travel period where a potential issue regarding \$144.97 in claimed travel expenses is to be subject to interpretation and determination by the sub-committee. The identified issue related to consecutive travel claims for travel from Senator's Brazeau's declared primary residence to Ottawa, but for which there was no documented Senate business while Senator Brazeau was in Ottawa. We question the eligibility of expenses related to travel to Ottawa when no senate business is documented.

¹ Does not include an additional twelve (12) days mentioned in an email received on April 25, 2013 regarding reported dates that Senator Brazeau signed into the Senate Fitness Room as discussed at section 5.2.2.1 of this report under "Gym or Training Facility Information".

3. Scope, Limitations in Scope and Restrictions

3.1. Scope

As part of our examination, we performed the following:

- 1) We examined the documentation compiled by the Senate Internal Audit and Strategic Planning group. This documentation included the following:
 - a) Declarations of qualification,
 - b) Declarations of primary and secondary residences,
 - c) Residential lease for declared secondary residence (in the NCR),
 - d) Living expense claims,
 - e) Financial travel calendar,
 - f) Travel expense report (64 points travel system),
 - g) Travel expense claims,
 - h) Designated travellers and dependent children annual declaration
 - i) Cellular phone detailed invoices,
 - j) Attendance reports and sick leave documentation, and
 - k) Corporate AMEX credit card statements.
- 2) We examined the documentation provided by Senator Brazeau. This documentation included the following:
 - a) Bank account #1 account history reports, for the period of April 1, 2011 to August 14, 2012,
 - b) Bank account #2 account activity historical detail reports, for the period of April 13, 2012 to September 30, 2012, and
 - c) Personal income tax return for 2011.
- 3) We had discussions or conducted interviews with the following individuals:
 - a) Senator Patrick Brazeau,
 - b) Senator Brazeau's external counsel

- c) Jill Anne Joseph, Director Internal Audit and Strategic Planning, Senate of Canada, and
- d) Nicole Proulx, Director of Finance, and Bonnie Marga, DCFO/Comptroller, Senate of Canada.

3.2. Limitations in Scope

Our examination was based on available documentation collected in the course of our examination and the interviews we conducted as set out under the "Scope" section above. To the extent that we receive additional information, our findings herein may require revisions.

3.3. Restrictions

We reserve the right, but will be under no obligation, to review this report, and if we consider it necessary, to revise our report in light of any information, which becomes known to us after the date of this report.

3.3.1. Procedures Do Not Constitute an Audit of Financial Statements

An audit is generally performed with the objective of providing reasonable assurance that financial statements are free from material error whereas a forensic examination utilizes accounting and investigative techniques to provide an analysis related to issues and questions that have arisen.

Deloitte was not engaged to, and did not perform a financial statement audit, review or compilation for the purpose of expressing an opinion on historical financial statements in accordance with standards established by the Canadian Institute of Chartered Accountants ("CICA"). Accordingly, Deloitte does not express such an opinion or any form of assurance. The forensic examination procedures undertaken were consistent with the "Standard Practices for Investigative and Forensic Accounting Engagements" (effective date March 1, 2007) developed by the Alliance for Excellence in Investigative and Forensic Accounting ("IFA Alliance") on behalf of the CICA.

4. Framework and guidelines related to Senators' residency and living allowances

4.1. Constitution of Canada Acts 1867 to 1982

Under the Constitution (S.23), there are various qualifications to be a Senator, including:

• • •

(3) He shall be legally or equitably seised as of Freehold for his own Use and Benefit of Lands or Tenements held in Free and Common Socage, or seised or possessed for his own Use and Benefit of Lands or Tenements held in Franc-alleu or in Roture, within the Province for which he is appointed, of the Value of Four thousand Dollars, over and above all Rents, Dues, Debts, Charges, Mortgages, and Incumbrances due or payable out of or charged on or affecting the same;

...

(5) He shall be resident in the Province for which he is appointed;

(6) In the Case of Quebec he shall have his Real Property Qualification in the Electoral Division for which he is appointed, or shall be resident in that Division.

No definition of residency for S.23 (5) is provided, although we note that since there is a separate requirement to hold property in the province (S.23 (3)), a qualification of residency must mean more than simply owning or renting a property in the province. Deloitte was not asked to review the requirement to hold property in the province.

Recognizing that Senators are required to be in Ottawa at various points throughout the year to conduct Senate business, provision has historically been made for Senators' expenses in Ottawa to be paid for by the Senate, in certain circumstances.

4.2. Period of Examination and Relevant Framework of Residency and Allowances

Our examination encompasses a period from April 1, 2011 to September 30, 2012. The various expense reimbursements and allowances to which Senators are entitled are paid in accordance with the *Senate Administrative Rules* ("SARs").

4.2.1. Senate Administrative Rules and Other Guidelines on Allowances

We have been provided with, and reviewed, two versions of the SARs, the first version being in force from June 16, 2009 to June 4, 2012, and the second version being in force since June 5, 2012.

Both versions of the SARs include the following preface:

The Senate Administrative Rules govern Senate administrative practice. They complement and are of equal authority to the Rules of the Senate, which govern Senate procedure. In the interests of good governance, the administrative rules codify comprehensively the fundamental principles and rules governing the internal administration of the Senate and its allocation and use of resources.

The Senate Administrative Rules are subject to statute law that applies to the Senate. Of particular note are the Constitution Acts, 1867 and 1982, the Parliament of Canada Act, the Members of Parliament Retiring Allowances Act and the Parliamentary Employment and Staff Relations Act.

The Senate Administrative Rules are supplemented by policies, guidelines, opinion, directives, forms and practices adopted or implemented by the Senate, the Standing Committee on Internal Economy, Budgets and Administration and the Clerk of the Senate.

The Internal Economy Committee is responsible for the administration of the *Senate Administrative Rules* and for giving guidance on their interpretation to Senators and the Senate Administration.

During the period of our examination, one significant change was made to the SARs that has bearing on our analysis. The change was made effective June 5, 2012 to introduce the Senators' Travel Policy, which effectively replaced the previous SARs Section 4:03 Travel Entitlements and Expenses.

In addition, further information about the entitlements is found in:

- Senators' Travel Guidelines (revised November 26, 2009),
- Senators' Living Expenses in the NCR Guidelines (revised June 17, 2010), and
- Senators' Resource Guide Section IV Travel (revised November 30, 2010).

Context

Chapter 4.03 – Travel Entitlements and Expenses of the SARs included the following regarding allowed costs:

10. No person shall cause the Senate to pay or reimburse a cost under this chapter unless the cost was actually incurred, reasonable and authorized, and is either an allowance or is supported by a receipt or other documentation.

The Travel Policy (effective June 5, 2012) provides context that is useful to repeat here:

2.1.1 This policy recognizes that travel is a necessary component of senators' parliamentary functions. Parliamentary functions are typically carried out in Ottawa and senators must travel to and from their primary residences in order to attend Senate sittings and committee meetings. Parliamentary functions are also carried out in senators' regions and, from time-to-time, senators may be required to travel to other locations, both within Canada and internationally, in the service of the Senate.

2.1.2 This policy also recognizes that a senator's parliamentary functions can result in frequent and lengthy periods of separation from family. In that context, the policy provides for family-reunion travel as an important contributor to the health and well-being of senators and their families.

2.1.3 However, spending public funds on travel is a sensitive matter and sound judgement must be exercised when travel-related decisions are made. It is expected that decisions to incur travel expenditures will be made with due regard to the need, frequency, cost, and purpose as it relates to a senator's parliamentary functions.

4.2.2. Eligibility for Allowances

The various sources of residency requirements and the frameworks within which declarations and related expense claims can be made are discussed below.

| | Source | April 1, 2011 to June 4, 2012 | June 5, 2012 to September 30, 2012 | | |
|---|--|--|--|--|--|
| Residency | | | | | |
| National Capital Region ("NCR") | SARs 4:03 (1) Senators' Travel Policy | Parliament Hill and the area within 100 km of it. | The area within 100km of Parliament Hill. | | |
| Primary Residence | Senators' Travel Policy | | The residence identified by the senator as his/her main residence and is situated in the province or territory represented by the senator. | | |
| National Capital Residence | SARs 1:03 (1-9) | A residence established by a Senator within 100 kilometres of Parliament Hill that is not the Senator's provincial residence. | A residence established by a Senator within 100 kilometres of Parliament Hill that is not the Senator's provincial residence. | | |
| Provincial Residence | SARs 1:03 (1-10) | A Senator's residence in the province or territory for which the Senator is appointed. | A Senator's residence in the province or territory for which the Senator is appointed. | | |
| Eligibility to claim I | iving expenses | | | | |
| SARs 4:03 (14) Travel Status Senators' Travel Policy 2.4.1 | | A Senator whose provincial residence in the province or territory the Senator represents is more than 100 kilometres from Parliament Hill, and who is within 100 kilometres of Parliament Hill for the purpose of carrying out the Senator's parliamentary functions is on travel status in the National Capital Region in the NCR and are entitled to be reimbursed for living expenses in the NCR under this entitlement. | Travellers shall be considered to be on travel status when they are undertaking Senate-related travel that takes them at least 100 km away from their primary residence. In such cases, travel expenses are charged to the 64- point travel system. | | |
| Living Expenses in the NCR | Senators' Resource Guide IV Travel s2.8 | Senators who come to Ottawa to carry out their parliamentary functions and who are more than 100 kilometres from their primary residence when in Ottawa are on travel status in the NCR and are entitled to be reimbursed for living expenses in the NCR. Only senators may claim under this entitlement. | | | |
| Eligibility and Primary Residence Declaration | Senators' Living Expenses in the NCR Guidelines (similar provision included in Senators' Resource Guide IV Travel s2.8) Senators' Travel Policy 2.11.2 | In order to claim living expenses in the National Capital Region (area within 100 kilometres of Parliament Hill), a senator must file with the Clerk, and keep up to date, a declaration designating a primary residence in the province or territory represented by the senator. Senators who come to Ottawa to carry out their parliamentary functions, and who are more than 100 kilometres from their registered residence, are on travel status in Ottawa and are entitled to | In order to claim living expenses in the NCR, a senator shall file, on an annual basis, a <i>Declaration of Primary and</i> <i>Secondary Residences</i> as well as the required documentation. Senators are responsible to notify immediately the Finance Division of any changes in the status of their residences and to amend the declaration accordingly. | | |

| | Source | April 1, 2011 to June 4, 2012 | June 5, 2012 to September 30, 2012 |
|-------------------------------|--|--|---|
| | | be reimbursed for the expenses incurred by them that are allowed under these terms and conditions. These guidelines apply to senators only and to expenses incurred by a senator only. | |
| Claimable living ex | penses | | |
| Living Expenses in the NCR | SARs 4:03 (14-15) Senators' Travel Policy 2.11 | A Senator on travel status in the National Capital Region is entitled to claim the following in respect of accommodation expenses: (a) reimbursement for the receipted cost of hotel or other commercial accommodation incurred by the Senator, up to the maximum daily amount set by finance rule; (b) reimbursement for the receipted cost of rented or leased accommodation incurred by the Senator; or (c) an allowance in respect of private accommodation used by the Senator in an amount set by finance rule. | Senators who are more than 100 kilometres from their primary residence when they come to the NCR to carry out their parliamentary functions are on travel status and shall be reimbursed for living expenses. The total reimbursement per fiscal year shall not exceed the maximum established by the Committee. Given the frequent and relatively long-term nature of senators' visits to the NCR, the provisions for living expenses differ somewhat from those allowed under other travel circumstances. Furthermore, living expenses incurred in the NCR are funded from a separate budget set aside for this purpose and are therefore exempt from the point system. |

4.2.3. Allowed Costs (Mileage, Accommodation, Per Diem)

The costs allowed during the period of our examination were as follows:

Mileage

The Travel Guidelines and the Travel Policy provide that, when the mode of transportation is by automobile, a claim for distance travelled shall be calculated at 55 cents per kilometre. This rate remained constant throughout the period of our examination.

Accommodation and Per Diem

The provisions for accommodation and per diem expenses are discussed below

| | Source | April 1, 2011 to June 4, 2012 | June 5, 2012 to September 30, 2012 |
|---|---|--|---|
| Commercial Accommodation in the NCR | Living Expenses in NCR Guidelines Senators' Travel Policy 2.11.3 | A senator on travel status in the NCR will be reimbursed for hotel, motel, rooming or other commercial innkeeper expenses in the NCR, up to the maximum amount set per night (plus applicable taxes) upon provision of receipts. The rate is set out in chapter 6:01 of the <i>Senate</i> <i>Administrative Rules</i> or in the <i>Senators' Travel Guidelines</i> , Appendix A. | The cost of commercial accommodation (hotel, motel, rooming house or other commercial innkeeper) may be reimbursed to the maximum amount per night established by the Committee. |

| | Source | April 1, 2011 to June 4, 2012 | June 5, 2012 to September 30, 2012 |
|---|---|---|---|
| Rented or leased accommodation in the NCR | Living Expenses in NCR Guidelines Senators' Travel Policy 2.11.3 | A senator, who rents or leases an accommodation in the NCR, will be reimbursed for the rent by providing a copy of the lease and proof of payment. The senator is required to submit a <i>Declaration of Primary and Secondary Residences</i> form on a yearly basis (at the beginning of each fiscal year) to attest that: the lessor is not a "family member" as defined in the Senate Administrative Rules (chapter 1:03, section 1); the lease will not further the private interests of the senator or those of his or her "family member"; and no senator or his/ her "family member" shall have an interest in a partnership or private corporation that is a party to such lease under which the partnership or corporation receives a benefit. | A senator may lease accommodation in the NCR and be reimbursed for the monthly rent upon submission of a copy of the lease and proof of payment. The senator shall attest on the annual <i>Declaration of Primary</i> <i>and Secondary Residences</i> form that: the lessor is not a "family member" as defined in the Senate Administrative Rules; the lease will not further the private interests of the senator or those of his or her "family member"; and no senator or his or her "family member"; shall have an interest in a partnership or private corporation that is a party to such lease under which the partnership or corporation receives a benefit. Senators who share an apartment where the lease is not in their name shall submit, in lieu of a copy of the lease, a written explanation of the rental arrangement and proof of payment (copies of cheques are not accepted as proof of payment). |
| Ownership of a secondary residence in the NCR | Living Expenses in NCR Guidelines Senators' Travel Policy 2.11.3 | A senator who owns a secondary residence in the NCR may be reimbursed for accommodation expenses at the rate set out in chapter 6:01 of the <i>Senate</i> <i>Administrative Rules</i> or in the <i>Senators' Travel Guidelines</i> for each day such residence is available for the senator's occupancy, and providing that during such time it is not rented to another person or claimed as an expense by another senator. The senator is required to submit a proof of ownership of that secondary residence with the <i>Declaration of</i> <i>Primary and Secondary Residences</i> form on a yearly basis (at the beginning of each fiscal year). | A senator who owns a secondary residence in the NCR may be reimbursed an allowance for private accommodation at a rate set by the Committee for each day such residence is available for the senator's occupancy, and providing that during such time it is not rented to another person or claimed as an expense by another senator. Proof of ownership is defined as a municipal tax statement. Other documents will need to be reviewed by the Law Clerk's office. |
| Meals and Incidental Expenses | Living Expenses in NCR Guidelines Senators' Travel Policy 2.11.4 | Senators on travel status in Ottawa will be reimbursed at the per diem rates set by the Standing Committee on Internal Economy, Budgets and Administration which follows the rates set by Treasury Board Secretariat meal allowance and incidental expenses incurred by public servants on travel status. These allowances are included in chapter 6:01 of the Senate Administrative Rules or in the Senators' Travel Guidelines, Appendix A. Per diems claimed for both the day of arrival and departure from Ottawa will be charged to the 64-point travel system rather than to the Living Expenses budget. | Meal and incidental expenses shall be reimbursed on the basis of allowance rates established by the Committee. Senators may claim for meals incurred while on travel status but shall only claim for those meals for which there was no provision from another source paid for from public funds. |

The daily rate for Private Accommodation in the NCR during the period of our examination was initially \$28.00, which was increased on December 15, 2011 to \$29.28. The daily rate for meals and incidental expenses was equal to the rate approved by the Treasury Board Secretariat, ranging from \$86.35 to \$88.60 during the period of our examination.

Living Allowance Maximum

The Senators' Living Expenses in the NCR Guidelines provided that a maximum reimbursement amount was set as follows:

The maximum total amount that can be reimbursed to each senator for the fiscal year under these guidelines is \$20,000. Expenditures above this limit may however be charged to the Miscellaneous Expenditures Account portion of the Senator's Research and Office Expense Budget.

The Internal Economy, Budgets and Administration Records of Decisions provides confirmation that expenditures could be allowed to exceed the \$20,000 per annum limit, and any such amount, to a maximum of \$5,000 per annum, would be charged to the "Miscellaneous Expenditures Account" portion of the Senators' Research and Office Expense Budget, resulting in a maximum reimbursement amount of \$25,000 per annum. The June 5, 2012 Travel Policy provides for the maximum reimbursement amount at \$22,000 per annum effective April 1, 2012. We have assumed therefore that the previous \$20,000 maximum was applicable to the period of our examination period.

4.3. Observations and Findings on Framework for Residency and Allowances

- Senators, whose "primary residence" is located more than 100 kilometres from the NCR, are entitled to a reimbursement of travel expenses, and a reimbursement of living expenses, while in the NCR for Senate business.
- There is a lack of clarity in the terminology used for the different residences mentioned or discussed in in the applicable regulations and guidelines. The following terms are used without being clearly defined: primary residence, secondary residence, NCR residence, provincial residence. In addition, the term registered residence is not defined.
- The regulations and guidelines applicable during the period of our examination do not include criteria for determining "primary residence". As such, we are not able to assess the status of the primary residence declared by Senator Brazeau against existing regulations and guidelines.

5. Assessment of the Location of Senator Brazeau's Primary Residence

5.1. Declarations and Claims Made by Senator Brazeau

The following declarations were made by Senator Brazeau regarding his primary and secondary residences during the period of our examination:

| Date of Senator's Declaration | Period Covered | Primary Residence | Secondary Residence (in the NCR) | |
|----------------------------------|--|-------------------|--|--|
| March 3, 2011 | April 1, 2011 to March 31, 2012 | Maniwaki, Quebec | No secondary residence identified | |
| April 11, 2011 | April 1, 2011 to Maniwaki, Quebec March 31, 2012 | | Gatineau, Quebec (name of landlord and copy of lease provided) | |
| March 14, 2012 | April 1, 2012 to March 31, 2013 | Maniwaki, Quebec | Gatineau, Quebec (name of landlord and copy of lease provided) | |

Table 2: Summary of Senator Brazeau's Primary and Secondary Residence Declarations²

We understand the April 11, 2011 declaration was prepared by Senator Brazeau as a result of signing a 27-month lease for the Gatineau property on March 25, 2011, for the period March 28, 2011 to June 30, 2013.

The following claims for reimbursement of travel, accommodation and per diems were made, in respect of living allowances in the NCR were made during the period of our examination:

² Due to privacy concerns, only the city, town or village location has been included in the table. The detailed location information was included in the declaration forms.

| Category of Travel Expenditure | April 1, 2011 to March 31, 2012 | April 1, 2012 to Sep. 30, 2012 | Total |
|-----------------------------------|------------------------------------|-----------------------------------|----------|
| Number of claims submitted | 29 | 14 | 43 |
| Private accommodation | \$21,233 | \$10,500 | \$31,733 |
| Meals and incidentals (per diem) | \$0 | \$0 | \$0 |
| Vehicle mileage | \$1,936 | \$950 | \$2,886 |
| Total | \$23,169 | \$11,450 | \$34,619 |

Table 3: Summary of Senator Brazeau's Living Allowances in the NCR

Senator Brazeau's travel expense claims consist of claims for private accommodation in the NCR (for leasing the Gatineau property), and vehicle mileage for travel between his declared primary residence Maniwaki and Ottawa/Gatineau.

5.2. Considerations of Primary Residency

The only definition of primary residency in the documentation we reviewed is found in the Senators' Travel Policy which was effective June 5, 2012. It is defined therein as:

"the residence identified by the senator as his/her main residence and is situated in the province or territory represented by the senator"

As previously mentioned, the regulations and guidelines applicable during the period of our examination do not include criteria for determining "primary residence". As such, we are not able to assess the status of the primary residence declared by Senator Brazeau against existing regulations and guidelines.

In order to assess primary residence for all Senators, the Standing Committee requested that Senators submit the following information:

- 1. Copy of driver's license,
- 2. Copy of provincial health card,
- 3. Relevant information from personal income tax return providing provincial tax information, and
- 4. A signed statement indicating where the Senator votes.

We understand that the Standing Committee agreed that if a senator met all four "indicators", supported by travel documentation, they were deemed to have been interviewed and that no further work was completed as they were deemed to have met the primary residence test.

5.2.1. Senator Brazeau's Primary Residence "Indicators"

We have reviewed copies of the information provided by Senator Brazeau, which we have summarized in the following table.

Table 4: Senator Brazeau's Primary Residence "Indicators"

| Indicator | Indicator Met / Not Met | | |
|-----------------------------|--|--|--|
| Driver's license | Met – located in Maniwaki, although not the declared primary residence | | |
| Provincial Health Card | Met – but Quebec health cards do not include an address | | |
| Income Tax Return | Met | | |
| Signed Statement re: voting | Met – as Maniwaki appears to be in these two electoral ridings. | | |

Senator Brazeau appears to have met the four (4) indicators used by Standing Committee to determine whether senators have met the primary residence test.

5.2.2. Senator Brazeau's Travel Patterns

In addition to the primary residence "indicators", we have collected and reviewed other information which could assist in the determination of the location of Senator Brazeau's primary residence. The information was reviewed in order to establish where Senator Brazeau was located during the period of our examination, consisting of the 549 days from April 1, 2011 to September 30, 2012.

5.2.2.1 Documents Relied Upon

Senate Attendance Register

The Senate Attendance Register provided a list of days when the Senate was sitting, the attendance record of Senator Brazeau for Senate business and public business, as well as the days when Senator Brazeau attended Senate committee meetings.

Travel Claims

Senator Brazeau's travel claims were reviewed as they provide information for the days for which per diem amounts were claimed by Senator Brazeau for senate business. Senator Brazeau indicated that per diem amounts were only claimed while on senate business away from Ottawa. During the period of our review, Senator Brazeau did not claim per diems while in Ottawa on Senate business or otherwise.

Cellular Telephone

Cellular telephone invoices were received for the period of our examination. Senator Brazeau confirmed that, but for a minimal number of transactions, he was the only person using the telephone associated with the documents received. These records provide information as to the location, date and time of specific telephone calls made or received, providing insight as to the location of Senator Brazeau.

Bank Accounts Information

Information for two bank accounts was provided. For the first bank account, account history reports were provided for the period of April 1, 2011 to August 14, 2012, at which time the account appears to have been closed. The account history reports provide specific location for debit card transactions.

For the second bank account, historical detail reports were provided for the period of April 13, 2012 (the date on which the account was apparently opened) to September 30, 2012. These reports do not provide the specific location for debit card transactions, but we have identified the location for the majority of the transactions based on publicly available information (i.e. information on the location of specific stores and businesses).

Senator Brazeau confirmed that, but for a minimal number of transactions, he was the only person using the bank cards related to the documentation received.

Credit Card Statements

Credit card statements were provided by the Senate for the corporate Amex credit card used by Senator Brazeau for Senate related travel. These records provide information as to the location and date of specific transactions, providing insight at to the location of Senator Brazeau.

We did not receive any other information related to credit cards. The bank account information reviewed did indicate a number of credit card payments, however, Senator Brazeau stated that other than the Senate-issued Amex credit card he did not have credit cards during the period of our examination.

Hunting and Fishing Information

Senator Brazeau provided a report from the Association Chasse et Pêche de la Désert, located in the Maniwaki area. The report provides specific dates and time when Senator Brazeau entered the hunting and fishing territory. Furthermore, Senator Brazeau indicated that he is often away hunting or fishing for several days at a time, in areas with no cellular phone reception. This appears to be supported with documentation showing on multiple occasions Senator Brazeau entering the hunting and fishing territory, and no other transactions (banking or telephone) being recorded for up to three days.

Gym or Training Facility Information

During our meeting with Senator Brazeau, he indicated that additional information regarding senate business could be obtained from his gym or training facility for the period January to March 2012 during which time he was training for a charity boxing match. On April 17, 2013, we sent a request to Senator Brazeau's counsel asking authorization to obtain this information directly from the gym or training facility. On April 25, 2013 we received an email from the office of Senator Brazeau indicating he had signed into the Senate Fitness Room on twelve (12) different days during the month of January 2012. As of the date of this report, we have not received authorization to obtain this information directly from the gym or training facility.

We have not updated our assessment based on the information provided. The impact of this information on the overall assessment would be to increase the number of days identified as "Ottawa – Senate business" by twelve (12), decreased the number of days identified as "Ottawa – activity undocumented" by eleven (11) and decrease the number of days identified as "unknown" by one (1).

5.2.2.2 Location Confirmed, Likely or Unconfirmed

For each of the 549 days in the period under examination, based on the available information, we also assessed whether the location determination was confirmed, likely, or unconfirmed.

| | Number of Days |
|-------------|----------------|
| Confirmed | 484 |
| Likely | 33 |
| Unconfirmed | 32 |
| Total | 549 |

Table 5: Status of Location Assessment

Location Confirmed (484 days, 88%)

An assessment of location as confirmed was based on third party information (i.e. a telephone call made or received, or debit card transactions) indicating the location of Senator Brazeau on a specific day.

Location Likely (33 days, 6%)

Senator Brazeau's location was identified as likely when the information reviewed appeared to reasonably place him in a specific location, but that no third party information (i.e. telephone call or debit card transaction) supported this assessment. More specifically, this includes the following situations

- 1. Days for which Senator Brazeau was confirmed as being in the Ottawa/Gatineau area on the preceding and following days, and for which no other information would indicate he was in a different location.
- 2. Days where Senator Brazeau was confirmed as being in the Maniwaki area on the preceding and following days, and the hunting and fishing information indicated that he entered the hunting and fishing territory.

Location Unconfirmed (32 days, 6%)

Senator Brazeau's location was identified as unconfirmed for days where we have not received any documentation that would support his location. We have asked Senator Brazeau about other potential sources of documentation to determine his location on these days, but no specific source of additional information was identified.

In summary, as we have Senator Brazeau's location either confirmed or considered likely for 94% of the period under examination, we are confident that our analysis is an accurate picture of Senator Brazeau's travel patterns and location during the period.

5.2.2.3 Summary of Senator Brazeau's Location and Travel Patterns

Based on the information available, we prepared graphic summaries of the locational indicators from April 2011 to September 2012. This information enabled us to perform a determination of Senator Brazeau's location on a daily basis. This analysis, presented at Schedule 1 to this report and summarized below, represents our assessment of the location of Senator Brazeau at the end of the day.

| End of Day Location of Senator Harb | Number of Days | % | |
|--|------------------------|------|--|
| Ottawa – Senate Business | 77 ³ | 14% | |
| Other locations – Senate Business | 9 | 2% | |
| Total Senate Business | 86 | 16% | |
| Ottawa – activity undocumented | 317 | 58% | |
| Ottawa – day before or after Senate Business | 50 | 9% | |
| Declared Primary Residence (plus 13 identified day trips) | 57 | 10% | |
| Other locations – activity undocumented | 12 | 2% | |
| Unknown | 27 | 5% | |
| Total | 549 | 100% | |

Table 6: Summary of Senator Brazeau's Location

³ Does not include an additional twelve (12) days mentioned in an email received on April 25, 2013 regarding reported dates that Senator Brazeau signed into the Senate Fitness Room as discussed at section 5.2.2.1 of this report under "Gym or Training Facility Information".

In addition, we have presented below the same assessment on a monthly basis for each category. This provides additional information regarding potential trends, patterns and seasonality of Senator Brazeau's travels.

| Period | Ottawa Senate Business | Other location Senate Business | Ottawa, before/after Senate Business | Ottawa, activity undocumented | Primary Residence | Other location, activity undocumented | Unknown | Total | Primary Residence (Day Trips)* |
|--------|------------------------------|---|---|-------------------------------------|----------------------|---|---------|-------|--------------------------------------|
| Apr-11 | 1 | 0 | 2 | 23 | 0 | 4 | 0 | 30 | 2 |
| May-11 | 0 | 1 | 0 | 25 | 1 | 4 | 0 | 31 | 2 |
| Jun-11 | 9 | 0 | 8 | 9 | 2 | 2 | 0 | 30 | 1 |
| Jul-11 | 1 | 2 | 1 | 19 | 6 | 0 | 2 | 31 | 0 |
| Aug-11 | 1 | 3 | 1 | 13 | 8 | 0 | 5 | 31 | 0 |
| Sep-11 | 3 | 0 | 2 | 21 | 4 | 0 | 0 | 30 | 0 |
| Oct-11 | 7 | 0 | 4 | 17 | 3 | 0 | 0 | 31 | 1 |
| Nov-11 | 10 | 0 | 3 | 10 | 5 | 0 | 2 | 30 | 0 |
| Dec-11 | 7 | 0 | 5 | 19 | 0 | 0 | 0 | 31 | 0 |
| Jan-12 | 1 | 0 | 1 | 22 | 1 | 1 | 5 | 31 | 1 |
| Feb-12 | 8 | 2 | 4 | 13 | 2 | 0 | 0 | 29 | 0 |
| Mar-12 | 10 | 0 | 7 | 14 | 0 | 0 | 0 | 31 | 0 |
| Apr-12 | 6 | 0 | 5 | 16 | 1 | 0 | 2 | 30 | 0 |
| May-12 | 10 | 1 | 5 | 8 | 3 | 0 | 4 | 31 | 2 |
| Jun-12 | 0 | 0 | 0 | 25 | 5 | 0 | 0 | 30 | 3 |
| Jul-12 | 0 | 0 | 0 | 18 | 8 | 0 | 5 | 31 | 0 |
| Aug-12 | 0 | 0 | 0 | 28 | 1 | 1 | 1 | 31 | 0 |
| Sep-12 | 3 | 0 | 2 | 17 | 7 | 0 | 1 | 30 | 1 |
| Total | 77 | 9 | 50 | 317 | 57 | 12 | 27 | 549 | 13 |

Table 7: Monthly Detail of Senator Brazeau's Location

* Day trips not included in monthly totals

Majority of Time

Based on our analysis, we estimate that Senator Brazeau was in Ottawa for 443 of the 549 days during the period of our examination, or approximately 81% of the period under examination, of which:

- 76 days (14%) were for documented Senate business;
- 50 days (9%) were either immediately before or after Senate business; and
- 317 days (58%) were in Ottawa, the nature of which is unknown.

Senator Brazeau has indicated that while in Ottawa, he works on Senate business, documented or not, five days per week.

Declared Primary Residence

In terms of Senator Brazeau's declared primary residence (Maniwaki), the documentation indicated that he was there for 57 of the 549 days (10%) during the period of our examination. In addition, we have identified thirteen days (2%) where Senator Brazeau travelled from Ottawa to his declared primary residence and then travelled back to Ottawa or to another location on the same day.

Senator Brazeau indicated that he typically visits his declared primary residence a few times per month and stays from a few hours to several days in Maniwaki. Due to the relatively short distance between Ottawa/Gatineau and Maniwaki, our analysis may not have captured all of the short trips by Senator Brazeau to his declared primary residence. We did not identify visits to Maniwaki by Senator Brazeau during the months of December 2011 and March 2012. Otherwise, based on our analysis, it appears that Senator Brazeau visited his declared primary residence with some regularity, with a minimum of one (1) day and a maximum of eight (8) days per month spent in the Maniwaki area (including day trips) during the period of our examination.

Other Locations

Senator Brazeau was located outside of the Ottawa/Gatineau and Maniwaki area for twelve (12) days, nine (9) of which were in Montreal.

Unknown

We have not been able to determine a location for twenty-seven (27) days. We asked Senator Brazeau for additional information but he was not able to provide information that would confirm his location on those specific days.

6. Assessment of Senator Brazeau Travel Expense Claims

6.1. Nature of Maniwaki-Ottawa/Gatineau claims

The majority of Senator Brazeau's travel claims are for travel from Maniwaki to Ottawa and returning to Maniwaki. The travel claims are for mileage only, and do not include any per diem amount for meals and incidentals.

The claims indicate a single date of travel between Senator Brazeau's declared primary residence in Maniwaki and Ottawa/Gatineau. Based on our examination, it appears that the actual travel date may be within one day of the indicated travel date. The period of travel can also vary from a return trip within the same day, to a multi-night stay at the declared primary residence.

In addition, Senator Brazeau has not claimed for all of his travel between Maniwaki and Ottawa/Gatineau. As an example, claim (T64-21928) is for travel from Ottawa to Maniwaki on April 13, 2012. Supporting transactions confirm Senator Brazeau being in the Maniwaki area on April 14, 2012. The following claim (T64-21932) is from travel from Maniwaki to Ottawa on April 23, 2012. Supporting transactions confirm Senator Brazeau being in the Maniwaki area on April 23, 2012. Supporting transactions confirm Senator Brazeau being in the Maniwaki area on April 23, 2012. Supporting transactions confirm Senator Brazeau being in the Maniwaki area on April 23, 2012. Senator Brazeau was confirmed as being in the Ottawa/Gatineau area between April 15 and April 21, 2012, confirming his claim that he also travels between Maniwaki and Ottawa/Gatineau without claiming travel expenses from the Senate. In total, we identified twenty-five (25) trips between Maniwaki and Ottawa/Gatineau where no reimbursement was claimed from the Senate.

6.2. Occurrence of travel

We have reviewed Senator Brazeau's claims related to travel from his declared primary residence and Ottawa/Gatineau to, assess whether these trips occurred or could have occurred. We have presented a summary of our assessment in the following table:

| | Number of Trips |
|---|-----------------|
| Trips with confirmed location in Maniwaki area | 11 |
| Unconfirmed trips with no transaction on previous day | 8 |
| Unconfirmed trips – other | 9 |
| Total | 28 |

Table 8: Likelihood of Travel Assessment

Trips with confirmed location in Maniwaki area

We have confirmed that Senator Brazeau was located in the Maniwaki area for eleven (11) of the twentyeight (28) trips claimed between Ottawa/Gatineau and Maniwaki.

Unconfirmed trips

We have not been able to confirm that Senator Brazeau was located in the Maniwaki area for seventeen (17) of the twenty-eight (28) trips claimed between Ottawa/Gatineau and Maniwaki.

Of these, eight (8) trips were claimed occurring Monday, immediately after a Sunday where no transactions (financial or telephone) have been recorded for Senator Brazeau. Given the relatively short travel distance between Ottawa/Gatineau and Maniwaki, it is possible that Senator Brazeau travelled to Maniwaki without a need to buy gas, grocery or other purchases at stores, or using his cellular telephone. For these eight (8), there is no information that would indicate that Senator Brazeau was in a location that would effectively eliminate any chance that he travelled to Maniwaki.

For the final nine (9) trips, we also have not identified transactions (financial or telephone) indicating that Senator Brazeau was located in the Maniwaki area, but for which we have identified transactions in the Ottawa area. Again, given the relatively short travel distance between Ottawa/Gatineau and Maniwaki, it is possible that Senator Brazeau travelled to Maniwaki (including day trips) without making purchases at stores or using his cell phone. For these nine (9) trips, there is no information that would indicate that Senator Brazeau was in a location that would effectively eliminate any chance that he travelled to Maniwaki.

Conclusion

Overall, we have assessed that all of trips between Ottawa/Gatineau and Maniwaki claimed by Senator Brazeau did take place or could have taken place.

6.3. Claims subject to interpretation and determination by the Standing Committee of Internal Economy

We identified one period where Senator Brazeau submitted consecutive travel claims for travel from his declared primary residence to Ottawa, and from Ottawa returning to his declared primary residence, but for which there was no documented Senate business while Senator Brazeau in Ottawa.

The policy allows for travel from the primary residence to the NCR to attend senate business and return travel to the primary residence. The result is that Senator Brazeau has received payment for travelling from his declared primary residence to Ottawa and returning to his primary residence with no documented Senate business.

As previously mentioned, Senator Brazeau has indicated that while in Ottawa, he works on Senate business, documented or not, five days per week. Despite Senator Brazeau's indication regarding undocumented Senate business, we have identified the following claims to be subject of interpretation and determination by the sub-committee due to the lack of documented Senate business.

Claims T64-15839 and T64-15841 - \$144.97

Claim T64-15839 relates to travel from Maniwaki to Ottawa "to attend admin/Senate business", in the amount of \$72.48 (133kms at \$\$0.545 per km).

Claim T64-15841 relates to travel from Ottawa to Maniwaki to "return from Senate admin business", in the amount of \$72.49 (133kms at \$0.545 per km).

Schedule 1 – Summary of Senator Brazeau's Location

| Date | Day | Ottawa - Senate Business (including per diem) | Ottawa/ Gatineau - activity undocumented | Primary Residence | Primary Residence - Day Trip | Other location - Senate business | Other location - activity undocumented | Unknown |
|-----------|-----|---|---|----------------------|------------------------------------|---|--|---------|
| | | | | | | | | |
| 01-Apr-11 | Fri | | | | | | | |
| 02-Apr-11 | Sat | | | | | | | |
| 03-Apr-11 | Sun | | | | | | | |
| 04-Apr-11 | Mon | | | | | | | |
| 05-Apr-11 | Tue | | | | | | | |
| 06-Apr-11 | Wed | | | | | | | |
| 07-Apr-11 | Thu | | | | | | | |
| 08-Apr-11 | Fri | | | | | | | |
| 09-Apr-11 | Sat | | | | | | | |
| 10-Apr-11 | Sun | | | | | | | |
| 11-Apr-11 | Mon | | | | | | | |
| 12-Apr-11 | Tue | | | | | | | |
| 13-Apr-11 | Wed | | | | | | | |
| 14-Apr-11 | Thu | | | | | | | |
| 15-Apr-11 | Fri | | | | | | | |
| 16-Apr-11 | Sat | | | | | | | |
| 17-Apr-11 | Sun | | | | | | | |
| 18-Apr-11 | Mon | | | | | | | |
| 19-Apr-11 | Tue | | | | | | | |
| 20-Apr-11 | Wed | | | | | | | |
| 21-Apr-11 | Thu | | | | | | | |
| 22-Apr-11 | Fri | | | | | | | |
| 23-Apr-11 | Sat | | | | | | | |
| 24-Apr-11 | Sun | | | | | | | |
| 25-Apr-11 | Mon | | | | | | | |
| 26-Apr-11 | Tue | | | | | | | |
| 27-Apr-11 | Wed | | | | | | | |
| 28-Apr-11 | Thu | | | | | | | |
| 29-Apr-11 | Fri | | | | | | | |
| 30-Apr-11 | Sat | | | | | | | |
| | | | | | | | | |
| | | 1 | 25 | 0 | 2 | 0 | 4 | 0 |

Confirmed Likely Unconfirmed

| | Confirmed |
|------------|-------------|
| | Likely |
| | Unconfirmed |
| | |
| location - | |

| Date | Day | Ottawa - Senate Business (including per diem) | Ottawa/ Gatineau - activity undocumented | Primary Residence | Primary Residence - Day Trip | Other location - Senate business | Other location - activity undocumented | Unknown |
|----------------|-----|---|---|----------------------|------------------------------------|---|--|---------|
| | | | | | | | | |
| 01-May-11 | Sun | | | | | | | |
| 02-May-11 | Mon | | | | | | | |
| 03-May-11 | Tue | | | | | | | |
| 04-May-11 | Wed | | | | | | | |
| 05-May-11 | Thu | | | | | | | |
| 06-May-11 | Fri | | | | | | | |
| 07-May-11 | Sat | | | | | | | |
| 08-May-11 | Sun | | | | | | | |
| 09-May-11 | Mon | | | | | | | |
| 10-May-11 | Tue | | | | | | | |
| 11-May-11 | Wed | | | | | | | |
| 12-May-11 | Thu | | | | | | | |
| 13-May-11 | Fri | | | | | | | |
| 14-May-11 | Sat | | | | | | | |
| 15-May-11 | Sun | | | | | | | |
| 16-May-11 | Mon | | | | | | | |
| 17-May-11 | Tue | | | | | | | |
| , 18-May-11 | Wed | | | | | | | |
| 19-May-11 | Thu | | | | | | | |
| 20-May-11 | Fri | | | | | | | |
| 21-May-11 | Sat | | | | | | | |
| 22-May-11 | Sun | | | | | | | |
| 23-May-11 | Mon | | | | | | | |
| 24-May-11 | Tue | | | | | | | |
| 25-May-11 | Wed | | | | | | | |
| 26-May-11 | Thu | | | | | | | |
| 27-May-11 | Fri | | | | | | | |
| 28-May-11 | Sat | | | | | | | |
| 29-May-11 | Sun | | | | | | | |
| 30-May-11 | Mon | | | | | | | |
| 31-May-11 | Tue | | | | | | | |
| SI WAY II | iuc | | | | | | | |
| | - | 0 | 25 | 1 | 2 | 1 | 4 | 0 |

| Date | Day | Ottawa - Senate Business (including per diem) | Ottawa/ Gatineau - activity undocumented | Primary Residence | Primary Residence - Day Trip | Other location - Senate business | Other location - activity undocumented | Unknown |
|------------------------|------------|---|---|----------------------|------------------------------------|---|--|---------|
| 01-Jun-11 | \A/a d | | | | | | | |
| 01-Jun-11 02-Jun-11 | Wed Thu | | | | | | | |
| | - | | | | | | | |
| 03-Jun-11 | Fri | | | | | | | |
| 04-Jun-11 | Sat | | | | | | | |
| 05-Jun-11 | Sun | | | | | | | |
| 06-Jun-11 | Mon | | | | | | | |
| 07-Jun-11 | Tue | | | | | | | |
| 08-Jun-11 | Wed | | | | | | | |
| 09-Jun-11 | Thu | | | | | | | |
| 10-Jun-11 | Fri | | | | | | | |
| 11-Jun-11 12-Jun-11 | Sat Sun | | | | | | | |
| 12-Jun-11 13-Jun-11 | | | | | | | | |
| 13-Jun-11 14-Jun-11 | Mon Tue | | | | | | | |
| 14-Jun-11 15-Jun-11 | Wed | | | | | | | |
| 15-Jun-11 16-Jun-11 | Thu | | | | | | | |
| 16-Jun-11 17-Jun-11 | Fri | | | | | | | |
| 17-Jun-11 18-Jun-11 | Sat | | | | | | | |
| 18-Jun-11 19-Jun-11 | Sun | | | | | | | |
| 20-Jun-11 | Mon | | | | | | | |
| 20-Jun-11 21-Jun-11 | Tue | | | | | | | |
| 21-Jun-11 22-Jun-11 | Wed | | | | | | | |
| 22-Jun-11 23-Jun-11 | Thu | | | | | | | |
| 23-Jun-11 24-Jun-11 | Fri | | | | | | | |
| 24-Jun-11 25-Jun-11 | Sat | | | | | | | |
| 26-Jun-11 | Sun | | | | | | | |
| 27-Jun-11 | Mon | | | | | | | |
| 27-Jun-11 28-Jun-11 | Tue | | | | | | | |
| 29-Jun-11 | Wed | | | | | | | |
| 30-Jun-11 | Thu | | | | | | | |
| 20 201-11 | mu | | | | | | | |
| | | 9 | 17 | 2 | 1 | 0 | 2 | 0 |

Confirmed Likely Unconfirmed

| Date | Day | Ottawa - Senate Business (including per diem) | Ottawa/ Gatineau - activity undocumented | Primary Residence | Primary Residence - Day Trip | Other location - Senate business | Other location - activity undocumented | Unknown |
|-----------|-----|---|---|----------------------|------------------------------------|---|--|---------|
| | | | | | | | | |
| 01-Jul-11 | Fri | | | | | | | |
| 02-Jul-11 | Sat | | | | | | | |
| 03-Jul-11 | Sun | | | | | | | |
| 04-Jul-11 | Mon | | | | | | | |
| 05-Jul-11 | Tue | | | | | | | |
| 06-Jul-11 | Wed | | | | | | | |
| 07-Jul-11 | Thu | | | | | | | |
| 08-Jul-11 | Fri | | | | | | | |
| 09-Jul-11 | Sat | | | | | | | |
| 10-Jul-11 | Sun | | | | | | | |
| 11-Jul-11 | Mon | | | | | | | |
| 12-Jul-11 | Tue | | | | | | | |
| 13-Jul-11 | Wed | | | | | | | |
| 14-Jul-11 | Thu | | | | | | | |
| 15-Jul-11 | Fri | | | | | | | |
| 16-Jul-11 | Sat | | | | | | | |
| 17-Jul-11 | Sun | | | | | | | |
| 18-Jul-11 | Mon | | | | | | | |
| 19-Jul-11 | Tue | | | | | | | |
| 20-Jul-11 | Wed | | | | | | | |
| 21-Jul-11 | Thu | | | | | | | |
| 22-Jul-11 | Fri | | | | | | | |
| 23-Jul-11 | Sat | | | | | | | |
| 24-Jul-11 | Sun | | | | | | | |
| 25-Jul-11 | Mon | | | | | | | |
| 26-Jul-11 | Tue | | | | | | | |
| 27-Jul-11 | Wed | | | | | | | |
| 28-Jul-11 | Thu | | | | | | | |
| 29-Jul-11 | Fri | | | | | | | |
| 30-Jul-11 | Sat | | | | | | | |
| 31-Jul-11 | Sun | | | | | | | |
| | - | | | | | | | |
| | | 1 | 20 | 6 | 0 | 2 | 0 | 2 |

Confirmed Likely Unconfirmed

| Confirmed |
|-------------|
| Likely |
| Unconfirmed |

| Date | Day | Ottawa - Senate Business (including per diem) | Ottawa/ Gatineau - activity undocumented | Primary Residence | Primary Residence - Day Trip | Other location - Senate business | Other location - activity undocumented | Unknown |
|-----------|-----|---|---|----------------------|------------------------------------|---|--|---------|
| | | | | | | | | |
| 01-Aug-11 | Mon | | | | | | | |
| 02-Aug-11 | Tue | | | | | | | |
| 03-Aug-11 | Wed | | | | | | | |
| 04-Aug-11 | Thu | | | | | | | |
| 05-Aug-11 | Fri | | | | | | | |
| 06-Aug-11 | Sat | | | | | | | |
| 07-Aug-11 | Sun | | | | | | | |
| 08-Aug-11 | Mon | | | | | | | |
| 09-Aug-11 | Tue | | | | | | | |
| 10-Aug-11 | Wed | | | | | | | |
| 11-Aug-11 | Thu | | | | | | | |
| 12-Aug-11 | Fri | | | | | | | |
| 13-Aug-11 | Sat | | | | | | | |
| 14-Aug-11 | Sun | | | | | | | |
| 15-Aug-11 | Mon | | | | | | | |
| 16-Aug-11 | Tue | | | | | | | |
| 17-Aug-11 | Wed | | | | | | | |
| 18-Aug-11 | Thu | | | | | | | |
| 19-Aug-11 | Fri | | | | | | | |
| 20-Aug-11 | Sat | | | | | | | |
| 21-Aug-11 | Sun | | | | | | | |
| 22-Aug-11 | Mon | | | | | | | |
| 23-Aug-11 | Tue | | | | | | | |
| 24-Aug-11 | Wed | | | | | | | |
| 25-Aug-11 | Thu | | | | | | | |
| 26-Aug-11 | Fri | | | | | | | |
| 27-Aug-11 | Sat | | | | | | | |
| 28-Aug-11 | Sun | | | | | | | |
| 29-Aug-11 | Mon | | | | | | | |
| 30-Aug-11 | Tue | | | | | | | |
| 31-Aug-11 | Wed | | | | | | | |
| | | | | | | | | |
| | - | 1 | 14 | 8 | 0 | 3 | 0 | 5 |

| Date | Day | Ottawa - Senate Business (including per diem) | Ottawa/ Gatineau - activity undocumented | Primary Residence | Primary Residence - Day Trip | Other location - Senate business | Other location - activity undocumented | Unknown |
|-----------|-----|---|---|----------------------|------------------------------------|---|--|---------|
| | | | | | | | | |
| 01-Sep-11 | Thu | | | | | | | |
| 02-Sep-11 | Fri | | | | | | | |
| 03-Sep-11 | Sat | | | | | | | |
| 04-Sep-11 | Sun | | | | | | | |
| 05-Sep-11 | Mon | | | | | | | |
| 06-Sep-11 | Tue | | | | | | | |
| 07-Sep-11 | Wed | | | | | | | |
| 08-Sep-11 | Thu | | | | | | | |
| 09-Sep-11 | Fri | | | | | | | |
| 10-Sep-11 | Sat | | | | | | | |
| 11-Sep-11 | Sun | | | | | | | |
| 12-Sep-11 | Mon | | | | | | | |
| 13-Sep-11 | Tue | | | | | | | |
| 14-Sep-11 | Wed | | | | | | | |
| 15-Sep-11 | Thu | | | | | | | |
| 16-Sep-11 | Fri | | | | | | | |
| 17-Sep-11 | Sat | | | | | | | |
| 18-Sep-11 | Sun | | | | | | | |
| 19-Sep-11 | Mon | | | | | | | |
| 20-Sep-11 | Tue | | | | | | | |
| 21-Sep-11 | Wed | | | | | | | |
| 22-Sep-11 | Thu | | | | | | | |
| 23-Sep-11 | Fri | | | | | | | |
| 24-Sep-11 | Sat | | | | | | | |
| 25-Sep-11 | Sun | | | | | | | |
| 26-Sep-11 | Mon | | | | | | | |
| 27-Sep-11 | Tue | | | | | | | |
| 28-Sep-11 | Wed | | | | | | | |
| 29-Sep-11 | Thu | | | | | | | |
| 30-Sep-11 | Fri | | | | | | | |
| | - | 3 | 23 | 4 | 0 | 0 | 0 | 0 |

| Date | Day | Ottawa - Senate Business (including per diem) | Ottawa/ Gatineau - activity undocumented | Primary Residence | Primary Residence - Day Trip | Other location - Senate business | Other location - activity undocumented | Unknown |
|-----------|-----|---|---|----------------------|------------------------------------|---|--|---------|
| | | | | | | | | |
| 01-Oct-11 | Sat | | | | | | | |
| 02-Oct-11 | Sun | | | | | | | |
| 03-Oct-11 | Mon | | | | | | | |
| 04-Oct-11 | Tue | | | | | | | |
| 05-Oct-11 | Wed | | | | | | | |
| 06-Oct-11 | Thu | | | | | | | |
| 07-Oct-11 | Fri | | | | | | | |
| 08-Oct-11 | Sat | | | | | | | |
| 09-Oct-11 | Sun | | | | | | | |
| 10-Oct-11 | Mon | | | | | | | |
| 11-Oct-11 | Tue | | | | | | | |
| 12-Oct-11 | Wed | | | | | | | |
| 13-Oct-11 | Thu | | | | | | | |
| 14-Oct-11 | Fri | | | | | | | |
| 15-Oct-11 | Sat | | | | | | | |
| 16-Oct-11 | Sun | | | | | | | |
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| 19-Oct-11 | Wed | | | | | | | |
| 20-Oct-11 | Thu | | | | | | | |
| 21-Oct-11 | Fri | | | | | | | |
| 22-Oct-11 | Sat | | | | | | | |
| 23-Oct-11 | Sun | | | | | | | |
| 24-Oct-11 | Mon | | | | | | | |
| 25-Oct-11 | Tue | | | | | | | |
| 26-Oct-11 | Wed | | | | | | | |
| 27-Oct-11 | Thu | | | | | | | |
| 28-Oct-11 | Fri | | | | | | | |
| 29-Oct-11 | Sat | | | | | | | |
| 30-Oct-11 | Sun | | | | | | | |
| 31-Oct-11 | Mon | | | | | | | |
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| Date | Day | Ottawa - Senate Business (including per diem) | Ottawa/ Gatineau - activity undocumented | Primary Residence | Primary Residence - Day Trip | Other location - Senate business | Other location - activity undocumented | Unknown |
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| | | | | | - | | | |
| 01-Nov-11 | Tue | | | | | | | |
| 02-Nov-11 | Wed | | | | | | | |
| 03-Nov-11 | Thu | | | | | | | |
| 04-Nov-11 | Fri | | | | | | | |
| 05-Nov-11 | Sat | | | | | | | |
| 06-Nov-11 | Sun | | | | | | | |
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| 11-Nov-11 | Fri | | | | | | | |
| 12-Nov-11 | Sat | | | | | | | |
| 13-Nov-11 | Sun | | | | | | | |
| 14-Nov-11 | Mon | | | | | | | |
| 15-Nov-11 | Tue | | | | | | | |
| 16-Nov-11 | Wed | | | | | | | |
| 17-Nov-11 | Thu | | | | | | | |
| 18-Nov-11 | Fri | | | | | | | |
| 19-Nov-11 | Sat | | | | | | | |
| 20-Nov-11 | Sun | | | | | | | |
| 21-Nov-11 | Mon | | | | | | | |
| 22-Nov-11 | Tue | | | | | | | |
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| 24-Nov-11 | Thu | | | | | | | |
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| 28-Nov-11 | Mon | | | | | | | |
| 29-Nov-11 | Tue | | | | | | | |
| 30-Nov-11 | Wed | | | | | | | |
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| | | 10 | 13 | 5 | 0 | 0 | 0 | 2 |

Confirmed Likely Unconfirmed

| Date | Day | Ottawa - Senate Business (including per diem) | Ottawa/ Gatineau - activity undocumented | Primary Residence | Primary Residence - Day Trip | Other location - Senate business | Other location - activity undocumented | Unknown |
|-----------|-----|---|---|----------------------|------------------------------------|---|--|---------|
| | | | | | | | | |
| 01-Dec-11 | Thu | | | | | | | |
| 02-Dec-11 | Fri | | | | | | | |
| 03-Dec-11 | Sat | | | | | | | |
| 04-Dec-11 | Sun | | | | | | | |
| 05-Dec-11 | Mon | | | | | | | |
| 06-Dec-11 | Tue | | | | | | | |
| 07-Dec-11 | Wed | | | | | | | |
| 08-Dec-11 | Thu | | | | | | | |
| 09-Dec-11 | Fri | | | | | | | |
| 10-Dec-11 | Sat | | | | | | | |
| 11-Dec-11 | Sun | | | | | | | |
| 12-Dec-11 | Mon | | | | | | | |
| 13-Dec-11 | Tue | | | | | | | |
| 14-Dec-11 | Wed | | | | | | | |
| 15-Dec-11 | Thu | | | | | | | |
| 16-Dec-11 | Fri | | | | | | | |
| 17-Dec-11 | Sat | | | | | | | |
| 18-Dec-11 | Sun | | | | | | | |
| 19-Dec-11 | Mon | | | | | | | |
| 20-Dec-11 | Tue | | | | | | | |
| 21-Dec-11 | Wed | | | | | | | |
| 22-Dec-11 | Thu | | | | | | | |
| 23-Dec-11 | Fri | | | | | | | |
| 24-Dec-11 | Sat | | | | | | | |
| 25-Dec-11 | Sun | | | | | | | |
| 26-Dec-11 | Mon | | | | | | | |
| 27-Dec-11 | Tue | | | | | | | |
| 28-Dec-11 | Wed | | | | | | | |
| 29-Dec-11 | Thu | | | | | | | |
| 30-Dec-11 | Fri | | | | | | | |
| 31-Dec-11 | Sat | | | | | | | |
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Confirmed Likely Unconfirmed

| Date | Day | Ottawa - Senate Business (including per diem) | Ottawa/ Gatineau - activity undocumented | Primary Residence | Primary Residence - Day Trip | Other location - Senate business | Other location - activity undocumented | Unknown |
|------------------------|------------|---|---|----------------------|------------------------------------|---|--|---------|
| 01 1 12 | 6 | | | | | | | |
| 01-Jan-12 02-Jan-12 | Sun Mon | | | | | | | |
| 02-Jan-12 03-Jan-12 | Tue | | | | | | | |
| 03-Jan-12 04-Jan-12 | | | | | | | | |
| | Wed | | | | | | | |
| 05-Jan-12 06-Jan-12 | Thu | | | | | | | |
| 06-Jan-12 07-Jan-12 | Fri | | | | | | | |
| 07-Jan-12 08-Jan-12 | Sat Sun | | | | | | | |
| 08-Jan-12 09-Jan-12 | Mon | | | | | | | |
| 10-Jan-12 | Tue | | | | | | | |
| 10-Jan-12 11-Jan-12 | Wed | | | | | | | |
| 12-Jan-12 | Thu | | | | | | | |
| 13-Jan-12 | Fri | | | | | | | |
| 13-Jan-12 14-Jan-12 | Sat | | | | | | | |
| 15-Jan-12 | Sun | | | | | | | |
| 16-Jan-12 | Mon | | | | | | | |
| 17-Jan-12 | Tue | | | | | | | |
| 18-Jan-12 | Wed | | | | | | | |
| 19-Jan-12 | Thu | | | | | | | |
| 20-Jan-12 | Fri | | | | | | | |
| 21-Jan-12 | Sat | | | | | | | |
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| 23-Jan-12 | Mon | | | | | | | |
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| 25-Jan-12 | Wed | | | | | | | |
| 26-Jan-12 | Thu | | | | | | | |
| 27-Jan-12 | Fri | | | | | | | |
| 28-Jan-12 | Sat | | | | | | | |
| 29-Jan-12 | Sun | | | | | | | |
| 30-Jan-12 | Mon | | | | | | | |
| 31-Jan-12 | Tue | | | | | | | |
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| Date | Day | Ottawa - Senate Business (including per diem) | Ottawa/ Gatineau - activity undocumented | Primary Residence | Primary Residence - Day Trip | Other location - Senate business | Other location - activity undocumented | Unknown |
|-----------|-----|---|---|----------------------|------------------------------------|---|--|---------|
| | | | | | | | | |
| 01-Feb-12 | Wed | | | | | | | |
| 02-Feb-12 | Thu | | | | | | | |
| 03-Feb-12 | Fri | | | | | | | |
| 04-Feb-12 | Sat | | | | | | | |
| 05-Feb-12 | Sun | | | | | | | |
| 06-Feb-12 | Mon | | | | | | | |
| 07-Feb-12 | Tue | | | | | | | |
| 08-Feb-12 | Wed | | | | | | | |
| 09-Feb-12 | Thu | | | | | | | |
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| 12-Feb-12 | Sun | | | | | | | |
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| 14-Feb-12 | Tue | | | | | | | |
| 15-Feb-12 | Wed | | | | | | | |
| 16-Feb-12 | Thu | | | | | | | |
| 17-Feb-12 | Fri | | | | | | | |
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| 19-Feb-12 | Sun | | | | | | | |
| 20-Feb-12 | Mon | | | | | | | |
| 21-Feb-12 | Tue | | | | | | | |
| 22-Feb-12 | Wed | | | | | | | |
| 23-Feb-12 | Thu | | | | | | | |
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| 25-Feb-12 | Sat | | | | | | | |
| 26-Feb-12 | Sun | | | | | | | |
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| 28-Feb-12 | Tue | | | | | | | |
| 29-Feb-12 | Wed | | | | | | | |
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| Date | Day | Ottawa - Senate Business (including per diem) | Ottawa/ Gatineau - activity undocumented | Primary Residence | Primary Residence - Day Trip | Other location - Senate business | Other location - activity undocumented | Unknown |
|-----------|-----|---|---|----------------------|------------------------------------|---|--|---------|
| | | | | | - | - | | |
| 01-Mar-12 | Thu | | | | | | | |
| 02-Mar-12 | Fri | | | | | | | |
| 03-Mar-12 | Sat | | | | | | | |
| 04-Mar-12 | Sun | | | | | | | |
| 05-Mar-12 | Mon | | | | | | | |
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| 08-Mar-12 | Thu | | | | | | | |
| 09-Mar-12 | Fri | | | | | | | |
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| 15-Mar-12 | Thu | | | | | | | |
| 16-Mar-12 | Fri | | | | | | | |
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| 18-Mar-12 | Sun | | | | | | | |
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| 22-Mar-12 | Thu | | | | | | | |
| 23-Mar-12 | Fri | | | | | | | |
| 24-Mar-12 | Sat | | | | | | | |
| 25-Mar-12 | Sun | | | | | | | |
| 26-Mar-12 | Mon | | | | | | | |
| 27-Mar-12 | Tue | | | | | | | |
| 28-Mar-12 | Wed | | | | | | | |
| 29-Mar-12 | Thu | | | | | | | |
| 30-Mar-12 | Fri | | | | | | | |
| 31-Mar-12 | Sat | | | | | | | |
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Confirmed Likely Unconfirmed

| Confirmed |
|-------------|
| Likely |
| Unconfirmed |

| Date | Day | Ottawa - Senate Business (including per diem) | Ottawa/ Gatineau - activity undocumented | Primary Residence | Primary Residence - Day Trip | Other location - Senate business | Other location - activity undocumented | Unknown |
|-----------|-----|---|---|----------------------|------------------------------------|---|--|---------|
| | | | | | | | | |
| 01-Apr-12 | Sun | | | | | | | |
| 02-Apr-12 | Mon | | | | | | | |
| 03-Apr-12 | Tue | | | | | | | |
| 04-Apr-12 | Wed | | | | | | | |
| 05-Apr-12 | Thu | | | | | | | |
| 06-Apr-12 | Fri | | | | | | | |
| 07-Apr-12 | Sat | | | | | | | |
| 08-Apr-12 | Sun | | | | | | | |
| 09-Apr-12 | Mon | | | | | | | |
| 10-Apr-12 | Tue | | | | | | | |
| 11-Apr-12 | Wed | | | | | | | |
| 12-Apr-12 | Thu | | | | | | | |
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| 15-Apr-12 | Sun | | | | | | | |
| 16-Apr-12 | Mon | | | | | | | |
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| 18-Apr-12 | Wed | | | | | | | |
| 19-Apr-12 | Thu | | | | | | | |
| 20-Apr-12 | Fri | | | | | | | |
| 21-Apr-12 | Sat | | | | | | | |
| 21-Apr-12 | Sat | | | | | | | |
| 23-Apr-12 | Mon | | | | | | | |
| 24-Apr-12 | Tue | | | | | | | |
| 25-Apr-12 | Wed | | | | | | | |
| 26-Apr-12 | Thu | | | | | | | |
| 27-Apr-12 | Fri | | | | | | | |
| 28-Apr-12 | Sat | | | | | | | |
| 29-Apr-12 | Sun | | | | | | | |
| 30-Apr-12 | Mon | | | | | | | |
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Ottawa -

Senate

Business

(including

per diem)

Day

Tue

Date

01-May-12

Ottawa/

Gatineau -

activity

undocumented

Primary

Residence

| | | | Likely Unconfirmed |
|------------------------------------|---|--|-----------------------|
| Primary Residence - Day Trip | Other location - Senate business | Other location - activity undocumented | Unknown |
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Confirmed

| 02-May-12 Wed | | | | | | | |
|---------------|----|----|---|---|---|---|---|
| 03-May-12 Thu | | | | | | | |
| 04-May-12 Fri | | | | | | | |
| 05-May-12 Sat | | | - | | | | |
| 06-May-12 Sun | | | | | | | |
| 07-May-12 Mon | | | | | | | |
| 08-May-12 Tue | | | | | | | |
| 09-May-12 Wed | | | | | | | |
| 10-May-12 Thu | | | | | | | |
| 11-May-12 Fri | | | | | | | |
| 12-May-12 Sat | | | | | | | |
| 13-May-12 Sun | | | | | | | |
| 14-May-12 Mon | | | | | | | |
| 15-May-12 Tue | | | | | | | |
| 16-May-12 Wed | | | | | | | |
| 17-May-12 Thu | | | | | | | |
| 18-May-12 Fri | | | | | | | |
| 19-May-12 Sat | | | | | | | |
| 20-May-12 Sun | | | | | | | |
| 21-May-12 Mon | | | | | | | |
| 22-May-12 Tue | | | | | | | |
| 23-May-12 Wed | | | | | | | |
| 24-May-12 Thu | | | | | | | |
| 25-May-12 Fri | | | | | | | |
| 26-May-12 Sat | | | | | | | |
| 27-May-12 Sun | | | | | | | |
| 28-May-12 Mon | | | | | | | |
| 29-May-12 Tue | | | | | | | |
| 30-May-12 Wed | | | | | | | |
| 31-May-12 Thu | | | | | | | |
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Schedule 1 Page 14 of 18

| Date | Day | Ottawa - Senate Business (including per diem) | Ottawa/ Gatineau - activity undocumented | Primary Residence | Primary Residence - Day Trip | Other location - Senate business | Other location - activity undocumented | Unknown |
|-----------|-----|---|---|----------------------|------------------------------------|---|--|---------|
| | | | | | | | | |
| 01-Jun-12 | Fri | | | | | | | |
| 02-Jun-12 | Sat | | | | | | | |
| 03-Jun-12 | Sun | | | | | | | |
| 04-Jun-12 | Mon | | | | | | | |
| 05-Jun-12 | Tue | | | | | | | |
| 06-Jun-12 | Wed | | | | | | | |
| 07-Jun-12 | Thu | | | | | | | |
| 08-Jun-12 | Fri | | | | | | | |
| 09-Jun-12 | Sat | | | | | | | |
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| 11-Jun-12 | Mon | | | | | | | |
| 12-Jun-12 | Tue | | | | | | | |
| 13-Jun-12 | Wed | | | | | | | |
| 14-Jun-12 | Thu | | | | | | | |
| 15-Jun-12 | Fri | | | | | | | |
| 16-Jun-12 | Sat | | | | | | | |
| 17-Jun-12 | Sun | | | | | | | |
| 18-Jun-12 | Mon | | | | - | | | |
| 19-Jun-12 | Tue | | | | | | | |
| 20-Jun-12 | Wed | | | | | | | |
| 21-Jun-12 | Thu | | | | | | | |
| 22-Jun-12 | Fri | | | | | | | |
| 23-Jun-12 | Sat | | | | | | | |
| 24-Jun-12 | Sun | | | | | | | |
| 25-Jun-12 | Mon | | | | | | | |
| 26-Jun-12 | Tue | | | | | | | |
| 27-Jun-12 | Wed | | | | | | | |
| 28-Jun-12 | Thu | | | | | | | |
| 29-Jun-12 | Fri | | | | | | | |
| 30-Jun-12 | Sat | | | | | | | |
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Confirmed Likely Unconfirmed

| Date | Day | Ottawa - Senate Business (including per diem) | Ottawa/ Gatineau - activity undocumented | Primary Residence | Primary Residence - Day Trip | Other location - Senate business | Other location - activity undocumented | Unknown |
|-----------|-----|---|---|----------------------|------------------------------------|---|--|---------|
| | | | | | | | | |
| 01-Jul-12 | Sun | | | | | | | |
| 02-Jul-12 | Mon | | | | | | | |
| 03-Jul-12 | Tue | | | | | | | |
| 04-Jul-12 | Wed | | | | | | | |
| 05-Jul-12 | Thu | | | | | | | |
| 06-Jul-12 | Fri | | | | | | | |
| 07-Jul-12 | Sat | | | | | | | |
| 08-Jul-12 | Sun | | | | | | | |
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| 12-Jul-12 | Thu | | | | | | | |
| 13-Jul-12 | Fri | | | | | | | |
| 14-Jul-12 | Sat | | | | | | | |
| 15-Jul-12 | Sun | | | | | | | |
| 16-Jul-12 | Mon | | | | | | | |
| 17-Jul-12 | Tue | | | | | | | |
| 18-Jul-12 | Wed | | | | | | | |
| 19-Jul-12 | Thu | | | | | | | |
| 20-Jul-12 | Fri | | | | | | | |
| 21-Jul-12 | Sat | | | | | | | |
| 22-Jul-12 | Sun | | | | | | | |
| 23-Jul-12 | Mon | | | | | | | |
| 24-Jul-12 | Tue | | | | | | | |
| 25-Jul-12 | Wed | | | | | | | |
| 26-Jul-12 | Thu | | | | | | | |
| 27-Jul-12 | Fri | | | | | | | |
| 28-Jul-12 | Sat | | | | | | | |
| 29-Jul-12 | Sun | | | | | | | |
| 30-Jul-12 | Mon | | | | | | | |
| 31-Jul-12 | Tue | | | | | | | |
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Schedule 1 Page 16 of 18

Confirmed

The Senate of Canada Summary of the Location of Senator Patrick Brazeau For the Period April 1, 20

Day

Wed

Thu

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Date

01-Aug-12

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24-Aug-12

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29-Aug-12

30-Aug-12

31-Aug-12

| Ottawa - Senate Business (including per diem) Ottawa/ Gatineau - activity Residence Primary Residence - Day Trip Other location - activity undocumented Unknown | 1, 2011 to S | Unconfirmed | | | | |
|---|----------------------------------|------------------------|-------------|----------------------|----------|---------|
| | Senate Business (including | Gatineau - activity | Residence - | location - Senate | activity | Unknown |
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Confirmed Likely

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| Date D | Day | Ottawa - Senate Business (including per diem) | Ottawa/ Gatineau - activity undocumented | Primary Residence | Primary Residence - Day Trip | Other location - Senate business | Other location - activity undocumented | Unknown |
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| | Fri | | | | | | | |
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| Entire Period | | 77 | 367 | 57 | 13 | 9 | 12 | 27 |



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