

File no. CI19-01-21883

**THE QUEEN'S BENCH  
WINNIPEG CENTRE**

B E T W E E N:

BRUCE SPENCE

Applicant

- and -

MANITOBA PUBLIC INSURANCE CORPORATION

Respondent

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**AFFIDAVIT OF BRUCE SPENCE**

*AFF*  
SWORN JULY 26, 2019

JUL 26 2019

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**James Kitchen and Jay Cameron  
Justice Centre for Constitutional Freedoms**

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Calgary, Alberta T2V 1K2

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Counsel for the Applicant

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B E T W E E N:

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**AFFIDAVIT OF BRUCE SPENCE**

I, Bruce Spence, of the City of Winnipeg, MAKE OATH AND SAY:

1. I have personal knowledge of the matters and facts hereinafter deposed to by me, except where same are stated to be based upon information and belief, in which cases I believe them to be true.
2. I am Nehiyaw winew; a Cree man. I am descended from fur traders and treaty signers on both sides of my family. My father, Ahab Spence, was an Anglican priest, a former president of the Manitoba Indian Brotherhood (Assembly of

Manitoba Chiefs), an *honoris causa*, a linguist and a member of the Order of Canada. My mother, Bette Spence (nee Bear) went back to school in her 60s for a Bachelor of Fine Art Degree from the University of Manitoba. My father and mother both attended residential schools in Manitoba and Saskatchewan.

3. I have been a reporter, Senior Producer and Line-up Editor with Aboriginal Peoples Television National (“APTN”) News since the department’s inception in February 2000.

**“NDN CAR” Personalized Licence Plate**

4. In or around 2012, I applied for and paid the required fee to receive the personalized license plate “NDN CAR” (“My Plate”). “NDN CAR” is read as “Indian car” and is a reference to the well-known song “Indian Cars” by Indigenous musician, Keith Secola.
5. Like many Indigenous people, I like the song “Indian Cars”. The song is an anthem to humble people just trying to get around the best way they can. In a 2019 article (attached to this affidavit as **“Exhibit A”**), “Indian Cars” was described as follows:

If there is a Native American national anthem, it’s “Indian Cars.” With wry Native humor, it celebrates a reservation one-eyed junker, its bumper held on by a sticker that says “Indian Power.”

6. Attached as “**Exhibit B**” to this affidavit is the biography page of Keith

Secola’s website, where it states the song “Indian Cars” is:

considered the contemporary Native American anthem, achieving legendary status and earning [Mr. Secola] a well-deserved cult following. It has been the number one requested song on tribal radio since the 1992.

7. The full lyrics to “Indian Cars” are:

Verse 1

I've been driving in my Indian Car  
Hear the pound of the wheel drumming in my brain  
My dash is dusty, my plates are expired  
Please Mr. Officer, let me explain  
I got to make it to a Pow Wow tonight  
I'll be singing 49, down by the riverside  
Looking for a sugar, riding in my Indian Car

Verse 2

Got my T-bird in the glove box, I ain't got no spare  
Got a feather from an eagle, I ain't got no care  
The road is empty in my bottle of desire  
Daylight is breaking, the sun touches fire  
I got to make another Pow Wow tonight  
I'll be singing 49, down by the riverside  
Looking for a sugar, riding in my Indian Car

Verse 3

My car is dented, the radiator steams  
One headlight don't work, the radio can scream  
I got a sticker says "Indian Power"  
I stuck it on my bumper, that's what holds my car together  
We're on a circuit of an Indian dream  
We don't get old, we just get younger  
When we're flying down the highway  
Riding in our Indian Cars

Repeat

We're on a circuit of an Indian dream  
We don't get old, we just get younger  
When we're flying down the highway  
Riding in our Indian Cars  
Riding in our Indian Cars  
Riding in our Indian Cars

8. I wanted My Plate so as to honour my Cree heritage, but also to make a witty reference to a popular song. Further, the car I drove when I first obtained My Plate (on which the plate was installed) somewhat resembled the car Keith Secola wrote about. It was a used Chrysler Sebring. Wear and tear took its toll. When the plastic front bumper was torn by driving up on a curb, I used black Gorilla tape to bind it back together. A similar repair was done to the rear bumper, giving the car a broken-down appearance.
9. I have received nothing but happy smiles and thumbs up in response to My Plate from fellow travellers across Canada and the United States. I have not encountered anyone that has not recognized My Plate for what it is, a humorous tribute to being an Indigenous person driving a car. In fact, many people have asked to have their picture taken with it.
10. On May 10, 2017, Mr. Secola was featured on APTN's national call-in show InFocus. He performed an unplugged version of the song after reviewing his career as a musician with host Cheryl McKenzie. A wall sized photo of My

Plate was the backdrop to the interview and live performance of "Indian Cars" (still shot attached as **Exhibit "C"** to this affidavit). Attached as **Exhibit "D"** is a video of the entire interview, including the unplugged performance of "Indian Cars". I am informed and do believe that nobody called in to complain about Mr. Secola, the song "Indian Cars" or the large photo of My Plate.

### **Revocation of the Plate**

11. On May 10, 2018 I received a phone call from a Manitoba Public Insurance ("MPI") staff person. She informed me that MPI had received a complaint regarding My Plate, complaining that it was offensive. I explained to her that I was an Indigenous person and that My Plate was a reference to the song "Indian Cars". I heard nothing again from MPI until February 2019.
12. On February 12, 2019, I received a letter from MPI, dated February 7 and attached to this affidavit as "**Exhibit E**", stating that My Plate was "prohibited, as per our guidelines", apparently because it had been "identified" as a "phrase or innuendo that may be considered offensive". The letter instructed me to "surrender" My Plate to MPI.
13. That same day, February 12, I called MPI, hoping to discuss why My Plate was being revoked and what, if anything, I could do to keep using it. The MPI staff person I spoke with did not realize what "NDN" stood for. She asked and I

explained it meant “Indian”. She responded, “oh, it’s racial, I bet that’s why.” She then told me that a complaint had been received by MPI regarding My Plate and that MPI must “listen to the public”. She explained that there was nothing I could do as the decision to revoke My Plate was final and there was no appeal process.

14. In the course of both phone calls with MPI, I asked how many complaints regarding My Plate had been received, and the nature of the complaints, but MPI staff refused to tell me.

15. I wanted to keep My Plate. I was frustrated that there was no process by which to appeal MPI’s decision to revoke My Plate and that I was required to give up something I liked simply because an anonymous person complained. I felt like I had no choice but to turn in My Plate, so I did. MPI said it “must listen to the public”, but I am part of the public, and MPI refused to listen to me. MPI did not explain to me, or even attempt to explain, the process it uses to revoke a personalized plate that it issued and renewed for seven years. I cannot understand how My Plate is offensive to anyone.

16. I am informed and do believe that a Winnipeg Star Trek fan had his personalized plate “ASIMIL8” revoked by MPI for much the same reason My Plate has been revoked.

### **MPI's Guidelines Regarding Expressive Content on Personalized Plates**

17. According to MPI's "guidelines" regarding personalized licence plate (the "Guidelines", attached to this Affidavit as **Exhibit "F"**), applications for proposed personalized plate slogans will not be "accepted" if they are considered "offensive, suggestive, or not in good taste". The Guidelines list a series of prohibited categories of expression, including the category that MPI relied on to revoke My Plate, "phrases or innuendos that may be considered offensive".

### **Truth and Reconciliation and the term "Indian"**

18. Over the last couple decades, as being "politically correct" has become more of pervasive, I have observed that many terms subsequent to "Indian" have been used to refer to the descendants of the original inhabitants of North America, including "Native", "First Nations", "Aboriginal" and, most recently, the currently in-vogue term "Indigenous". However, in my experience, older Indigenous people, like myself—still prefer to use the older terms, including "Indian", and do so without any prejudice.

19. I don't appreciate being told by the government that the word "Indian" is so offensive it should be censored and that I cannot use it on a personalized licence late to express myself. I don't think the word "Indian" is, itself,



derogatory, racist, or offensive. The word “Indian” is a useful and descriptive word that I and many other Indigenous people use on a regular basis. Indeed, I often refer to myself as a “Nehiyaw Indian” or as a “Cree Indian”. Further, I am informed and do believe that the term “Indian” regularly appears in the titles and content of legislation that relates to Indigenous people, the “Indian Act” being the most obvious example.

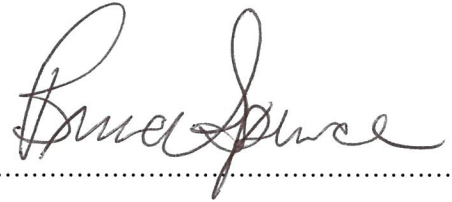
20. The nation of Canada has entered a period of reconciliation with the nations of the first people of this land. It seems to me that reconciliation must be mutual; it will not be successful if one side attempts to effect it on their terms only. I do not believe reconciliation will be advanced if government bureaucrats unilaterally decide that certain expressive content associated with Indigenous people must be censored. I believe Indigenous people should have a say in what is considered so offensive that it should be censored by government, on a licence plate and elsewhere. Indigenous people should be consulted about when and how the term “Indian” should no longer be used to refer to them and non-Indigenous governments should not be telling Indigenous people they cannot use the term “Indian” to refer to themselves.

21. Heavy-handed government action such as revoking My Plate and censoring the use of the phrase "Indian Car" on personalized licence plates does not propagate reconciliation, it detracts from it.
22. I swear this Affidavit bona fide and for no improper purpose and in support of the accompanying Application.

*Affirmed*

Sworn before me at the City of  
Winnipeg in the Province of Manitoba,  
on July 26, 2019.

M. LACANILAO  
DEPUTY REGISTRAR  
.....  
COURT OF QUEEN'S BENCH  
FOR MANITOBA



.....  
**BRUCE SPENCE**

This is Exhibit " A " referred to in the  
Affidavit of Bruce Spence  
Sworn/Affirmed before me this 26  
Day of July, 2019

~~DEPUTY REGISTRAR~~  
Deputy Registrar, Court of Queen's Bench  
DEPUTY REGISTRAR  
COURT OF QUEEN'S BENCH  
FOR MANITOBA

# RUMBLE ON: MORE NATIVE AMERICAN MUSICIANS YOU SHOULD KNOW

Ulali (Charly Lowry, Pura Fe, Layla Locklear, Jennifer Kreisberg), featured in RUMBLE

**JANUARY 3, 2019 | POSTED**  
**IN MUSIC**  
**MORE ABOUT RUMBLE**

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**by Gregg McVicar,**

*Host and producer of UnderCurrents on Native Voice One*

Rock and roll was born in the United States, and it makes sense that some of its forerunners would be the original Americans.

The people are the land and the music comes from the land.

Iconic artists like **Charley Patton**, **Mildred Bailey**, **Jimi**

**Hendrix**, **Robbie Robertson**, and **Redbone** were among the first to express this Native perspective through popular music.

We can connect the dots from Patton, the “Father of the Delta Blues,” on through a musical narrative that runs like a powerful river through today’s blues, rock and jazz music. The

film [RUMBLE](#) helps us understand why, and to actually

now *hear* these indigenous influences present themselves in rhythm, tonality, phrasing, and attitude.

This process has not stopped, just as Native cultures continue to thrive and evolve, adding new bits of influence into American culture. But what about the other direction? One often hears the question “why does today’s Native music sound so much like other styles?” The answer would have to be that today’s Native peoples are full participants in modern culture and engage in the same cultural give and take as everyone else.

In recent decades, these artists have melded their own traditions with *au courant* forms of expression to give us the Navajo (Diné) drum & bass sounds of **Sihasin**, the Inuit a cappella of **Pamua**, the country-rock storytelling of **Arigon Starr**, the Standing Rock-inspired folk of **Raye Zaragoza** and the topical lightning of **Prolific the Rapper** and **A Tribe Called Red**.

They have each chosen a way to express their “indigeneity,” purposefully trading bits of art and culture with others as Native peoples have always done throughout time.

This accounts for how Native values and instincts were present in the crucible of rock, and why so many other musical traditions are woven *into* Native works.

Mainly living and working outside of the mainstream music industry, Native musicians have joined (or created) small labels, touring below the radar to Indian events and world music festivals, some enjoying greater success in Europe than at home. You won't find most of them on late night TV shows or commercial radio. But they are regulars on Native radio around the U.S. and occasionally on public radio. Today's Native music remains somewhat underground, which makes the discovery process both challenging and deliciously rewarding.

In that spirit, we've created both this list and a [Spotify playlist](#) to introduce to you to some Native artists you should know about.

Each in their own way carries forward deep traditional values, incorporated musical strands such as reggae, punk, funk, techno, and alternative.

## **Pamyua**

In the Arctic Circle, the only indigenous instruments are the drum and the voice, used to accompany dance, often with masks. From this starting point, and inspired by the ethnic gumbo of The Meters, [Pamyua](#) (pron: BUM-you-wah) invented what they call "tribal funk," a melding of traditional circumpolar chants of Inuit, Yupic and Greenlandic origin, in powerful four-part harmony, propelled by funky percussion, keyboards and occasionally, didgeridoo. Alaskans are very proud of Pamyua and they're a big inspiration for Native youth.

## Nadjiwan

You can hear the chill of Toronto winters in his every song, yet each burns with passion and intelligence. Much of it is driven by the Redbone-style “King Kong Beat” with mesmerizing vocals floating above double-time guitars. Marc Meriläinen records under his own name and as NADJIWAN. He also collaborates in the electronic side-project Quillbox, where he continually explores rock and electronic soundscapes while giving voice to his Ojibway and Finnish heritage.

## Lila Downs

On the reservation, Mexicans can be viewed as outsiders. And Native music circles have tended not to include them. But when thousands of 1st Nation peoples gathered in full regalia for concerts celebrating the grand opening of the NMAI (National Museum of the American Indian) in Washington, D.C., an artist not known to them, Lila Downs, took the stage and completely wowed the crowd. Her intricate interweaving of Latin, jazz, and indigenous Mexican grooves was instantly recognizable as American Indian, but with a Pan-American perspective.

Powerful, polished and deeply folkloric, Lila Downs bridges the same distance that her parents, a White Minnesota professor and a Mixtec singer from Oaxaca, crossed. Downs' artistic stance and her music remind us that so many people from south of the border are Indians too, that we're all cousins. Her song "La Linea" ("The Border") challenges the imaginary line:

*Cornflower*

*The sky is watching over you*

*Plain of fire*

*The earth which gave birth to you*

*Spirit of the earth*

*Spirit of the sea*

*Spirit of luck*



## *Meant to wander*

### **Arigon Starr**

This Native woman has so much talent, she restlessly moves from one medium to the next. Through her own record label, *Wacky Productions*, Arigon Starr recorded four albums of her original songs. Her songcraft ranges from tender old-school country ballads (“Daddy’s Records”) to the punk of “Salmon Song” (“I will come back!). “Honor Me” takes a direct shot at team mascots while “California Indians” delivers a well-researched history lesson that takes us from The Senator Hotel to Alcatraz. She created radio a theater series, then a one-woman show in LA (*The Red Road*), and is now publishing her original comics, *Super Indian*. Starr is an enrolled member of the Kickapoo-Creek Nation Tribe of Oklahoma.

In all of her creative pursuits, she seems to most enjoy skewering tired stereotypical images of Indians.

## Prolific The Rapper

A lot of early rap was born as a socio-political critique of a brutal system of oppression. Think NWA. [Prolific The Rapper](#) (a.k.a. Aaron Sean Turgeon) has grabbed the baton of resistance rap with the anthem “Black Snakes,” a full-throated takedown of the oil industry, specifically the Dakota Access Pipeline, site of massive protests at Standing Rock in the Dakotas. Backed by Canadian First Nation samplers A Tribe Called Red, Prolific comes through with a plainspoken message that is made even more powerful by his blistering videos — documenting ongoing assaults on the land and its people, truth-telling activities that could have sent him to jail for seven years had the charges not been dropped.

*What is goin' on, have we lost our minds?*

*Every human needs clean water to survive.*

## **Sihasin**

Long a traditional Navajo (Dine') dance group led by their father Jones Banally, the kids were emotionally struck by lightning the first time they heard The Ramones. So as young teens in Northern Arizona, they formed a punk band, Blackfire. They burned hot with a message of resistance, touring the world many times, mainly playing small clubs and festivals. As they grew up and had their own kids, brother and sister Clayson and Jeneda Benally formed a new band, Sihasin (See-ha-sin), the Dine' word 'to think with hope and assurance.' They continue to dance, record, make videos and tour the world with a message of hope for social and environmental justice. "Fight Like a Woman" comes from their most recent album, produced by Ed Stasium (Talking Heads, Ramones).

## Keith Secola

Keith Secola is Anishinabe (Ojibwa) from the Iron Range of Northern Minnesota, now living in Arizona. Through his own record label Akina, he has been prolific, recording six albums and winning seven Native American Music Awards. Secola is gifted with a naturally funny and magnetic personality, easily able to instigate big jams and sing-alongs whether they be at major stage productions or intimate benefit shows.

If there is a Native American national anthem, it's "Indian Cars." With wry Native humor, it celebrates a reservation one-eyed junker, its bumper held on by a sticker that says "Indian Power." This fun remix brings Secola together with a host of rockers and rappers.

## Cary Morin

*RUMBLE* connected the dots from Southeast traditional tribal rhythm and vocals right on through the delta blues — which is where we find Cary Morin right at home. He's a masterful finger picker and an earthy, soulful singer with an impressive collection of original and distinctive songs to his credit, a perfect road trip companion. A member of the Crow Nation, and collaborator with Tuscaroran artist Pura Fé on her extensive European tours, Morin was a founding member of The Atoll which specialized in electronic world beats, then went solo and now also collaborates with John Magnie and Steve Amedée (of the Subdudes) in the band Young Ancients.

Live Acoustic Set:

## Nahko

Author Sherman Alexie answers the question “How do you know you’re Indian?” with a very straightforward “When your tribe says you are.” Yet identity is still complicated for many Native peoples given sometimes difficult family backstories with adoptions and cross-cultural marriages. Native artists such as Buffy Sainte-Marie and Michael Franti were raised by White adoptive parents far from a day-to-day tribal experience. As was Nahko, whose roots are Apache, Puerto Rican, and Filipino.

From desperate beginnings (his mother was a prostitute) to his advantaged Portland upbringing with classical piano lessons, then travel and his discovery of guitar, folk, and songwriting, Nahko’s path has been one of deep self-discovery. His band, Nahko and Medicine for the People, has garnered a passionate following, with avid young fans memorizing his rapid-fire lyrics and turning out in force for live shows.

**Debora Iyall**

Adopted by a working single-mother in Fresno, CA, Deborah Iyall (Cowlitz) always had teenage babysitters who introduced her to The Rolling Stones and all the current music on AM radio.

She was raised to be proud of her heritage, and at 14 she took part in the All Nations Occupation of Alcatraz (1969). Instead of going straight to college, Iyall purchased a VW camper van and joined the salmon protests on the Klamath River where Yurok people demanded return of their fishing rights. She wrote poetry and entered the San Francisco Art Institute where she joined forces with other students to form a band, Romeo Void, got a record deal and toured colleges all across the country. They even opened for U2.

To this day, “Never Say Never” and “A Girl in Trouble (Is a Temporary Thing)” are staples of modern rock radio.

In those days, Iyall’s distinctive talents and strong work ethic were thwarted by her not fitting in with the MTV “look” of the day. Lithe model-like waifs were *in* and sturdy dark-haired Indian women were *not*. But her power as a non-puritanical Native woman was fully felt and appreciated by her fans.

With her pride and Native identity completely intact, she has moved forward performing and recording with her own band (Debora Iyall Band) and developing her visual art. Iyall is an accomplished printmaker, and by day is a credentialed art teacher in Southern California.

## Ronnie Spector

Ronnie Spector was known as “The Bad Girl of Rock & Roll,” performed with all four of The Beatles, and was such a big star in Europe that The Rolling Stones once opened for *her*.

Spector’s mother was African American/Cherokee and her father Irish American. Her singing career began with a family group, the Ronettes (“Walking in the Rain,” “Be My Baby”), leading to a tumultuous marriage to record producer Phil Spector, and most recently to a successful album of British ’60’s covers titled *English Heart*. Here she is doing the Ramones song “She Talks To Rainbows.”



**Gregg McVicar** (Tlingit) is host and producer of the daily eclectic music show *UnderCurrents*, heard nationwide on Native Voice One, The Native American Radio Network ([NV1.org](http://NV1.org) — [undercurrentsradio.net](http://undercurrentsradio.net))

This is Exhibit "B" referred to in the  
Affidavit of Bruce Spence  
Sworn/affirmed before me this 26  
Day of July, 2019

B

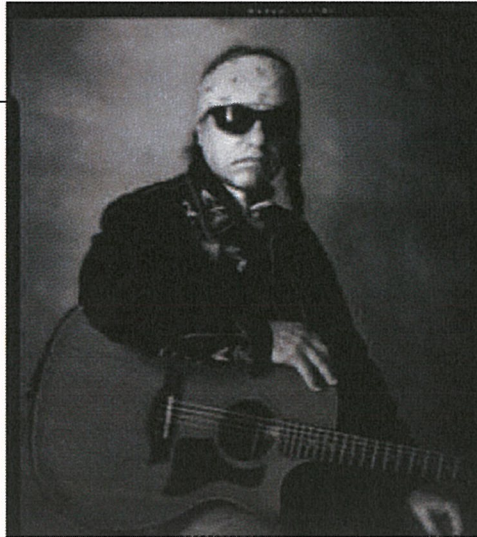
M. LACANILAO  
Deputy Registrar, Court of Queen's Bench  
DEPUTY REGISTRAR  
COURT OF QUEEN'S BENCH  
FOR MANITOBA

# KEITH SECOLA

HOME STATEMENT BIO CALENDAR MUSIC AUDIO PHOTO GALLERY BLOG PRESS/REVIEWS CONTACT MERCHANDISE

## INDIAN CARS (OFFICIAL VIDEO)

Keith Secola - NDN Kars (Official Video)



## KEITH SECOLA

### Keith Secola Bio

Keith Secola is an icon and ambassador of Native music. He is one of the most influential artists in the field today. Rising from the grassroots of North America, he is a songwriter of the people. Critics have dubbed him as the Native versions of both Neil Young and Bruce Springsteen. *NDN Kars* (Indian cars), his most popular song is considered the contemporary Native American anthem, achieving legendary status and earning him a well deserved cult following. It has been the number one requested song on tribal radio since the 1992. In 2011, he joined the ranks of Jimmy Hendrix, Hank Williams, Crystal Gale, and Richie Valens, and was inducted into the Native Music Hall of Fame.

Born in 1957 in Cook, Minnesota, Secola is affiliated with the Anishinabe tribe. He graduated from Mesabi Community College with a degree in Public Service in 1979, and completed a BA in American Indian Studies at the University of Minnesota in 1982. He is married and has two children.

Secola is an accomplished artist, garnering awards and accolades as a musician, a singer, a songwriter, a composer and a producer. He is highly skilled with the guitar, flute, mandolin, banjo, harmonica, and piano, and has played in venues from the halls of the Chicago Urban Indian Centre, to the walls of the bottom of the Grand Canyon. He has also performed at the Olympic Games in Atlanta 1996 and Salt Lake City 2002, and toured Europe several times. Among his numerous appearances he has graced the stages of the Rockslide Festival in Denmark, the Grand Opening Gala of the Smithsonian Museum of the American Indian, The Kennedy Center and the SXSW in Austin, TX, and is a staple at the Grassroots Festival in Upstate New York, North Carolina and Florida.

A seven-time Native American Music Award winner, Secola has earned NAMMYs not only for his music, but also his abilities as a producer, to include The Best Linguistic Recording for producing ANISHINABEMOIN (2007). A well respected musician, he has worked with music legends such as Mickey Hart of the Grateful Dead. Secola has also teamed with academics like author Dr. Tom Venum of the Smithsonian Folklife Institute, collaborating on the CD, AMERICAN WARRIORS: SONGS FOR INDIAN VETERANS, and with elders such as Karen Drift, a speaker of Anishenabemoin.

Secola has produced six well received independent CDs, since the early 1990s.

CIRCLE (1992) is a compilation of selected songs from previous cassette recordings: INDIAN CARS (1987), TIME FLYS LIKE AN ARROW...FRUIT FLIES LIKE A BANANA (1990), and ACOUSTIC AROMA (1991).  
and features the classic hit *NDN Kars*.

WILD BAND OF INDIANS (1998) is best known for fan favorites like *Frybread*, *4R Ancestors*, and *Wide Open Spaces*.

Twenty-four instrumental tracks featuring flute, guitar, and percussion provide a rich audible environment on HOMELAND (2001), the soundtrack for the PBS documentary film of the same name.

FINGERMONKEY (2000) is best classified as "Alter-Native" showcasing an eclectic compilation running from beautiful instrumental ballads and Native rhythms to on-the-edge Rock, Folk-inspired tales, with Blues and Reggae songs.

## JUMP IN OUR NDN CAR !!

Join the email list!

Email Address

## NDN CARS LIVE

NDN CARS Kei...



## NAMA HALL OF FAME

Keith Secola HOF I



## 4 R ANCESTORS LIVE SHAKORI HILLS GRASSROOTS FEST

NATIVE AMERICANA (2006) fusing traditional sounds with contemporary music earned Secola a NAMMY for *Kokopelli Blues*, a song that resets a traditional icon in a modern world with a blues track that features Native flute and John Densmore from THE DOORS on drums.

LIFE IS GRAND (2012) is a sixteen song collection of Rock and Folk, merging roots music with a Native soul and demonstrating a new level of artistic maturity.

Keith Secola & His Wild Band of Indians ...



Keith Secola also appears on:

A CENTURY OF MUSIC FROM THE OJIBWA PEOPLE, Minnesota Historical society 1994

HONOR: A BENEFIT FOR THE HONOR OF THE EARTH Campaign, Daemon Records, 1996.

Urban Skins, Vol. 1 Soar Records, 1999.

SKIN TIGHT BLUES: FIRST PEOPLES BLUES COMPILATION, Sweet Grass, 2002

NDN CAR REMIX Shawn Bernard, Joey Stylez Trac Records 2010.

Three European releases under Normal Records in Bonn, Germany, 1994-1999

Indian Rezervation Blues and More, Dixiefrog 2009, Paris, France

Native America Calling – Music from Indian Country – Trikont records, Germany 2007

The Ballad of Peter La Farge Rare Breed tribute 2010.

Native Music – Sony Records 2008

## SAY YOUR NAME

Say Your Nam...

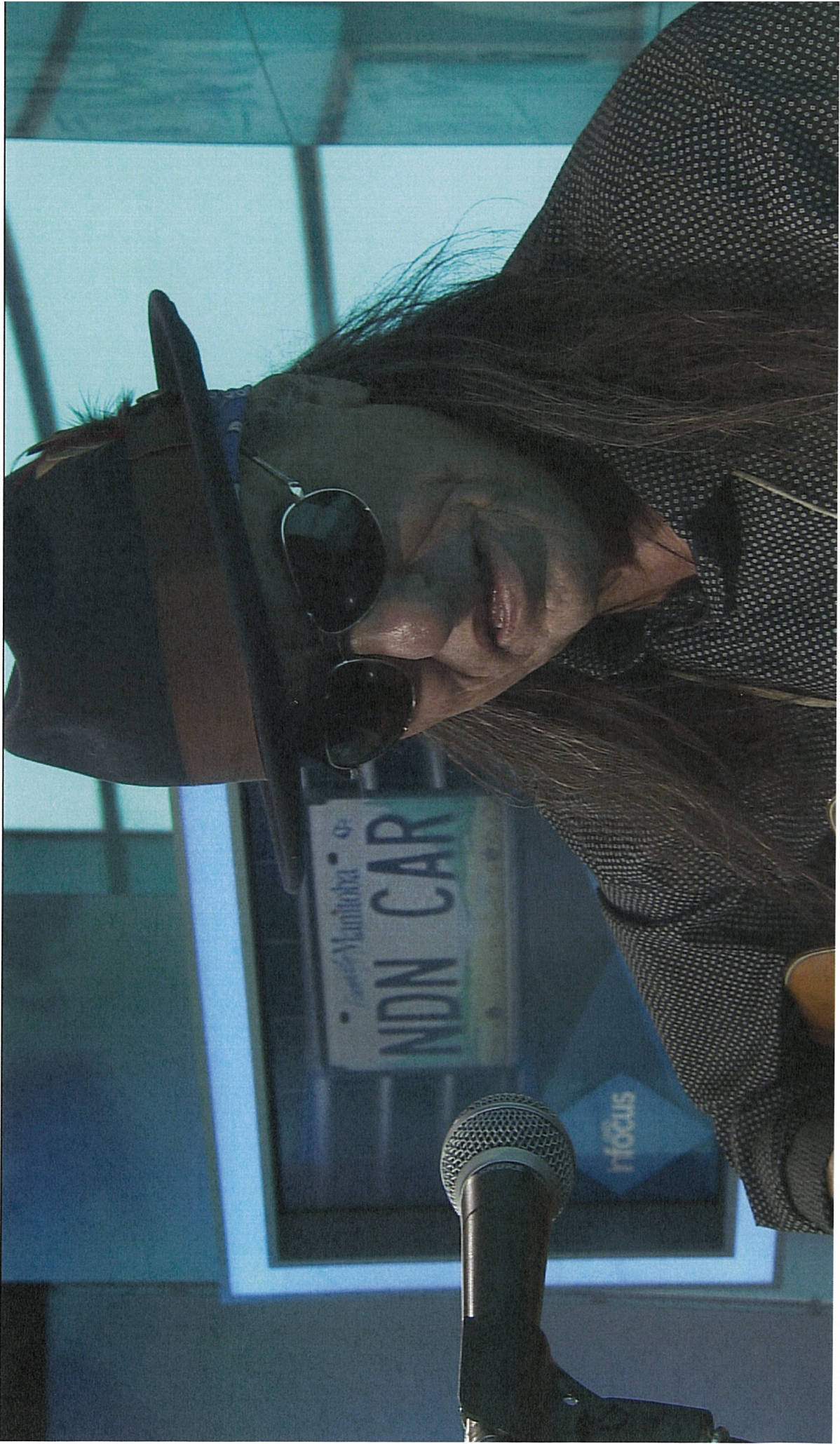


Share

This is Exhibit " C " referred to in the  
Affidavit of Bruce Spence  
Sworn/Affirmed before me this 26  
Day of July, 2019

M. LACANILAO  
DEPUTY REGISTRAR  
Deputy Registrar, Court of Queen's Bench  
COURT OF QUEEN'S BENCH  
FOR MANITOBA

C



This is Exhibit " D " referred to in the  
Affidavit of Bruce Spence  
Sworn/Affirmed before me this 26  
Day of July, 20 19

**M. LACANILAO**  
**DEPUTY REGISTRAR**  
Deputy Registrar, Court of Queen's Bench  
**COURT OF QUEEN'S BENCH**  
**FOR MANITOBA**

D

# Exhibit D



This is Exhibit " E " referred to in the  
Affidavit of Bruce Spence  
Sworn/Affirmed before me this 26  
Day of July, 2019

**M. LACANILAO**  
**DEPUTY REGISTRAR**  
Deputy Registrar, Court of Queen's Bench  
**COURT OF QUEEN'S BENCH**  
**FOR MANITOBA**

E



CERTIFIED

REF: [REDACTED]

SPENCE BRUCE ALLEN  
[REDACTED]

Customer Number: [REDACTED]

Date: 07 FEB 2019

We have attempted to contact you by telephone regarding your personalized license plate slogan "NDN CAR" but have been unsuccessful.

We are reviewing all slogans to make sure all active personalized plates fall within our guidelines. Your slogan "NDN CAR" has been identified in our review as phrases or innuendoes that may be considered offensive. As a result, it is now being recalled as it is prohibited, as per our guidelines.

Personalized plates cannot include: any profane, sexually suggestive, racial/ethnic slang, religious, or alcohol/drug-related words, phrases or innuendoes that may be considered offensive, suggestive or discriminatory, promote violence, or contain political messages of any description, in any language

Please visit any Manitoba Public Insurance Service Centre or Autopac agent to surrender your existing plates by **February 21, 2019**. At that time, you will be issued regular license plates at no charge.

You may replace your existing personalized plates with a different slogan at no charge. If you decide to choose a new slogan, please call our office at 204-985-7722 to make your request after you surrender your existing plates.

If you choose to keep the regular license plates, arrangements will be made to refund the \$100 (plus GST) you paid for your personalized plates.

If you have questions or concerns regarding this request or process, please feel free to contact our office.

Licensing Services Department  
Manitoba Public Insurance

/mt

This is Exhibit " F " referred to in the  
Affidavit of Bruce Spence  
Sworn/Affirmed before me this 26  
Day of July, 2019

M. LACANILAO  
DEPUTY REGISTRAR  
Deputy Registrar, Court of Queen's Bench  
COURT OF QUEEN'S BENCH  
FOR MANITOBA

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## Guidelines

Your application will not be accepted if the slogan you apply for has already been issued or if it is considered offensive, suggestive or not in good taste, in any language.

Slogans will be denied if they are considered:

- profane or derogatory
- sexually suggestive
- alcohol or drug related
- racial or ethnic slang
- discriminatory
- religious
- speed related
- promoting risky driving behaviour
- political messages of any description
- phrases or innuendoes that may be considered offensive
- violent or related to criminal activity
- abusive or obscene
- political figures, dignitaries or law enforcement officials

Licence plates are the property of the Crown and The Registrar of Motor Vehicles reserves the right to recall personalized licence plates.