

Delivered by: E-mail
File No.: 378.00004

August 10, 2020

Paul Morrison
Director, By-Law Enforcement
Flower City Community Campus
8850 McLaughlin Road South, Unit 2,
Brampton ON L6Y 5T1
enforcement@brampton.ca

Dear Mr. Morrison:

Re: Violations of Ontario’s Emergency Orders, Brampton COVID-19 Emergency Measures By-law MO 1-2020 (the “Emergency By-law”), and Brampton COVID-19 Mandatory Face Coverings By-law 135-2020 (the “Mask By-law”)

Identity: Patrick Brown, Mayor, City of Brampton (“Mayor Brown”)

We write further to our correspondence of August 7, 2020 wherein we advised that we had been retained by Rebel News Network Ltd. (“**Rebel News**”) and its reporter, David Menzies (“**Mr. Menzies**”), to report Mayor Brown’s apparent non-compliance with the above-noted emergency laws.

Mandatory Restrictions Related to COVID-19

The Ontario government has ordered mandatory restrictions related to COVID-19 to help protect the health and safety of Ontarians under the *Emergency Management and Civil Protection Act*. On March 31, 2020, Brampton City Council approved, and Mayor Brown signed, the [Emergency By-law](#) to help protect the health and safety of residents. These restrictions include attendance at, or use of, indoor recreational facilities.

As of August 9, 2020, the City of Brampton’s “Facility Rental” [website](#) stated, “Arenas are open for use by affiliates/major user groups for figure skating and ice hockey training and modified game play.” Surprisingly, as of today’s date, after Rebel News aired its report on Mayor Brown’s apparent non-compliance, the [website’s](#) language was edited as follows: “Arenas are open for use for figure skating and ice hockey training/modified gameplay.”

Further, on July 8, 2020, Brampton City Council approved, and Mayor Brown signed the [Mask By-law](#) mandating non-medical masks or face coverings in all indoor public spaces in the City of Brampton. Information on the Mask By-law can be found at the City of Brampton's dedicated [website](#), bearing Mayor Brown's photo and contact information.

Footage: Mayor Brown's Weekly Pick-Up Hockey Games at Brampton Recreation Centres

Rebel News and Mr. Menzies learned that throughout the COVID-19 pandemic, Mayor Brown has been holding weekly pick-up ice hockey games at City of Brampton recreation centres. Our clients view this as a direct violation of the above-noted provincial and municipal restrictions. In fact, on August 4, 2020, Mr. Menzies located Mayor Brown inside the Earnscliffe Recreation Centre ice hockey arena for his weekly, pick-up hockey game, not wearing a face covering. Footage from Mr. Menzies' report can be found [here](#).

As you will see, Mayor Brown claimed that he was "checking on [the] facility", despite toting a hockey bag labeled, "Patrick Brown".



Recusal: Independent Inspection and Enforcement of Violations by Mayor Brown

Since our correspondence, and apparently prior to a comprehensive inspection/investigation, you gave a statement to the [Brampton Guardian](#) finding that Mayor Brown was not in violation of any city by-laws. It is our client's position that your prejudgement on this matter raises a reasonable apprehension of bias, calling for your immediate recusal and a corresponding independent investigation into Mayor Brown's apparent non-compliance with the applicable emergency laws.

In the interim, we trust that By-law Enforcement will **preserve all records** for the purposes of this investigation, including but not limited to internal correspondence, facility rental records, and security camera footage.

Please feel free to contact the undersigned to discuss this matter further.

Yours very truly,

RE-LAW LLP



Aaron Rosenberg

cc: client