

**Ministry of the  
Attorney General**

Legal Services Branch  
Ministry of Community Safety  
and Correctional Services

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**Ministère du  
Procureur général**

Direction des services juridiques  
Ministère de la Sécurité communautaire et  
des Services correctionnels

655, rue Bay, bureau 501  
Toronto ON M7A 0A8

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January 13, 2012

Michael Jack  
c/o Lloyd Tapp  
252 Angeline Street North  
Lindsay, Ontario K9V 4R1

**VIA COURIER**

Dear Mr. Jack,

**Re: Michael Jack v. Her Majesty the Queen in Right of Ontario, as represented by the Ministry of Community Safety and Correctional Services and operating as the Ontario Provincial Police  
Tribunal File No: 2010-07633-I**

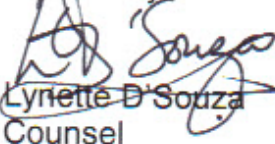
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In accordance with Rule 16.1, please find enclosed the arguably relevant documents currently in the respondent's possession.

We have made enquiries as to the potential existence of further documents, and if we become aware of any further arguably relevant documents, we will provide those as soon as possible.

Please do not hesitate to contact me if you have any questions or concerns.

Yours truly,

  
Lynette D'Souza  
Counsel

*Enclosed: 7 Volumes of the Respondent's Book of Arguably Relevant Documents*

**HUMAN RIGHTS TRIBUNAL OF ONTARIO**

**BETWEEN:**

**MICHAEL JACK**

**Applicant**

**- and -**

**HER MAJESTY THE QUEEN IN RIGHT OF ONTARIO, AS REPRESENTED BY THE  
MINISTER OF COMMUNITY SAFETY AND CORRECTIONAL SERVICES AND  
OPERATING AS THE ONTARIO PROVINCIAL POLICE**

**Respondent**

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**RESPONDENTS' BOOK OF ARGUABLY RELEVANT  
DOCUMENTS**

**VOLUME 1 OF 7**

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January 12, 2012

Ministry of Community Safety and  
Correctional Services  
Legal Services Branch  
655 Bay Street  
Suite 501  
Toronto, Ontario M7A 0A8

Lynette D'Souza  
Tel: (416) 326-1237  
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Counsel for the Respondent

**TO:** Michael Jack  
c/o Lloyd Tapp  
252 Angeline Street North  
Lindsay, Ontario K9V 4R1

Applicant

HUMAN RIGHTS TRIBUNAL OF ONTARIO

BETWEEN:

MICHAEL JACK

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HER MAJESTY THE QUEEN IN RIGHT OF ONTARIO, AS REPRESENTED BY THE  
MINISTER OF COMMUNITY SAFETY AND CORRECTIONAL SERVICES AND  
OPERATING AS THE ONTARIO PROVINCIAL POLICE

Respondent

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**Officers' Notes**

- A      PC Mary D'Amico #8171 Notes
- B      Sgt. Robert Flindall #9740 Notes
- C      Professional Standards Bureau, OPP letter to R. Flindall, Re: Order for Duty Report, dated October 14, 2009
- D      Email from T. Thompson, PSB to R. Flindall, Re: PSB Internal Complaint, dated October 15, 2009
- E      R. Flindall fax to T. Thompson with enclosed Confidential Duty Report, dated November 11, 2009
- F      Email from R. Flindall to M. Johnston, Re: PC Michael Jack, dated September 11, 2009
- G      Email from R. Flindall to M. Johnston, Re: Clarification re PC Jack, dated September 15, 2009

TAB	DOCUMENT
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H	R. Flindall Notes, September 10, 2009
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**Sgt. Robert Flindall**

- |   |  |
|---|--|
| I | <ol style="list-style-type: none"><li>1. November 6, 2009 - email correspondence between R. Flindall, Jennifer Payne, etc. Re: Switching block training</li><li>2. December 15, 2009 - email from J. Payne to G. Smith, M. Reynolds, R. Flindall, Re: Mike Jack's issued equipment</li><li>3. August 15, 2009 - email from R. Flindall to R. Campbell, Re: HTA Charge against Mike Jack while operating force vehicle today</li><li>4. August 15, 2009 - email from R. Flindall to M. Johnston, Re: HTA Charge against Mike Jack while operating vehicle today</li><li>5. August 15, 2009 - General Information Form, Re: Police Vehicle Operation, PC Jack</li><li>6. August 11, 2001 - email from PC Wager to R. Flindall</li><li>7. OPP Briefing Note, Issue: Dangerous police vehicle operation by PC Michael Jack (Probationary)</li><li>8. August 2, 2009 - email from R. Flindall to M. Johnston, Re: Jeff Sandaert</li><li>9. August 15, 2009 - email from J. Payne to R. Flindall Re Jack's last evaluation</li><li>10. January 9, 2009 - email from PC Jack to R. Campbell and N. Lawlor, Re: Block Training Joining Instructions January 12-15, 2009</li><li>11. August 20, 2009 - email from R. Flindall to B. Lafreniere Re: Constable Michael Jack</li><li>12. November 30, 2009 - email from C. Kohen to R. Flindall Re: PC Jack Chronology</li><li>13. October 29, 2009 - email from J. Payne to R. Flindall, Re: Block Training Joining Instructions January 11-14, 2010</li><li>14. November 20, 2009 - email correspondence between R. Campbell and S. Gozzard-Gilbert, Re: Michael Jack WIN#393080</li><li>15. November 10, 2009 - email from R. Campbell to numerous parties Re: Prob Jack (with teleconference codes)</li><li>16. November 10, 2009 - email from R. Campbell to C. Kohen, R. Nie, etc., Re: Prob Jack</li><li>17. November 10, 2009 - email from R. Campbell to C. Kohen and R. Nie, Re: Prob Jack – Follow up</li><li>18. October 27, 2009 - email from R. Campbell to G. Smith and R. Flindall, Re: FW: Remedial driver training for PC Michael Jack</li><li>19. September 28, 2009 - email from R. Campbell to R. Flindall and M. Johnston, Re: Additional Remarks by Cst Jack regarding his Evaluation</li></ol> |
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20. September 14, 2009 - email from R. Campbell to C. Kohen and R. Flindall, Re: Jack WIP masterc.doc
21. September 14, 2009 - email from R. Campbell to M. Johnston, Re: Jack WIB Masterc.doc
22. September 11, 2009 - email from R. Campbell to R. Flindall, Re: Jack
23. September 10, 2009 - email from R. Campbell to J. Payne, Re: Notes Tracking Cst Jack's duties on A Platoon
24. September 9, 2009 - email from R. Campbell to C. Koehn and R. Flindall, re: PCS66\_JACK8.doc
25. September 3, 2009 - email from R. Campbell to S. Gizzards-Gilbert and R. Flindall; Re: Michael Jack's PCS4
26. August 27, 2009 - email from R. Campbell to R. Flindall, S. Filman, J. Postma and R. Nie, Re: PCS066 for Mike Jack
27. August 24, 2009 - email from R. Campbell to R. Flindall, Re: Stnadaert-Anderson Complaint
28. August 20, 2009 - email from R. Campbell to R. Flindall
29. August 20, 2009 - email from R. Campbell to B. Lafreniere and Sgt Flindall, Re: Constable Michael Jack
30. August 20, 2009 - email from R. Campbell to M. Jack, R. Flindall, J. Postma, R. Nie, Re: Michael Jack Platoon D
31. August 19, 2009 - email from R. Campbell to J. Conway, M. Johnston, R. Flindall, S. Filman, Re: Possible charges against Douglas Anderson
32. August 17, 2009 - email from R. Campbell to T. Banbury, M. Johnston, Re: PC Jack – deceit
33. August 16, 2009 - email from R. Campbell to R. Flindall, S. Filman, Re: Mike Jack Driving
34. August 15, 2009 - email from R. Campbell to M. Johnston, R. Flindall, Re: HTA Charge against Mike Jack while operating force vehicle today
35. August 15, 2009 - email from R. Campbell to M. Johnston, Re: HTA Charge against Mike Jack while operating force vehicle today
36. July 17, 2009 - email from R. Campbell to S. Filman, M. Jack, R. Flindall, Re: Overdue Month 5 27 Jun 09
37. July 7, 2009 - email from R. Campbell to M. Jack, M. Gravelle, Re: Doug Anderson and Jeff Standaert
38. June 24, 2009 - email from R. Campbell to R. Flindall, Re: er1303845 – Michael Jack
39. May 11, 2009 - email from R. Campbell to R. Flindall, D. Lee, Re: Jack's next evaluation

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40. March 23, 2009 - email from R. Campbell to R. Flindall, Re: Jack Evaluation
41. September 24, 2008 - email from R. Campbell to R. Flindall, Re: Shift Changes
42. October 29, 2009 - email from R. Flindall to J. Payne, Re: Block Training Joining Instructions January 11-14, 2010
43. October 6, 2009 - email from R. Flindall to P. Butorac Re: R. v. Vollick sp09178964
44. September 27, 2009 - email from R. Flindall to R. Nie, RE: PC Jack
45. September 23, 2009 - email correspondence from R. Flindall to M. Johnston, Re: P/C Jack \*\*Urgent\*\*
46. September 22, 2009 - email from R. Flindall to M. Johnston, Re: Old occurrence involving PC Jack; General Occurrence Report SP05112642
47. September 13, 2009 - follow up email from R. Flindall to S. Filman, Re: Jack WIP masterc.doc
48. September 13, 2009 - email from R. Flindall to S. Filman, Re: Jack WIP masterc.doc
49. September 13, 2009 - email from R. Flindall to S. Filman, Re: Jack WIP
50. September 11, 2009 - email from R. Flindall to R. Campbell, Re: Jack
51. September 11, 2009 - email from R. Flindall to R. Powers, Re: Tape request from PC Jack; Tape Request form, Background Unit History, Playlist
52. September 11, 2009 – reply email from R. Flindall to C. Kohen, Re: PCS66\_Jack8
53. September 11, 2009 – reply email from R. Flindall to C. Kohen, Re: PCS66\_Jack8
54. September 11, 2009 - email from R. Flindall to C. Kohen, Re: PCS66\_Jack8
55. September 11, 2009 - email from R. Flindall to C. Kohen and R. Campbell, Re: PCS66\_Jack8
56. August 28, 2009 - email from R. Flindall to R. Campbell, Re: PCS066 for Mike Jack
57. August 26, 2009 - email from R. Flindall to s. Filman, Re: Constable Michael Jack
58. August 26, 2009 - email from R. Flindall to R. Campbell and J. Conway, Re: Jeff Staedert
59. August 24, 2009 - email from R. Flindall to S. Filman, Re: Constable Michael Jack
60. August 20, 2009 – reply email from R. Flindall to B. Lafreniere, Re: Thank you.
61. August 20, 2009 - email from R. Flindall to B. Lafreniere, Re: Thank you.

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62. August 20, 2009 - email from R. Flindall to B. Lafreniere, Re: Constable Michael Jack
63. August 16, 2009 - email from R. Flindall to R. Campbell, Re: Mike Jack Driving
64. August 16, 2009 - email from R. Flindall to R. Campbell, Re: Ride Havelock Area
65. August 15, 2009 – email (#4) from R. Flindall to M. Johnston, Re: HTA Charge against Mike Jack while operating force vehicle today
66. August 15, 2009 – email (#3) from R. Flindall to M. Johnston, Re: HTA Charge against Mike Jack while operating force vehicle today
67. August 15, 2009 - email (#2) from R. Flindall to M. Johnston, Re: HTA Charge against Mike Jack while operating force vehicle today
68. August 15, 2009 - email from R. Flindall to M. Johnston, Re: HTA Charge against Mike Jack while operating force vehicle today
69. August 15, 2009 - email from R. Flindall to B. Rathbun, J. Postma, T. Banbury, Re: PC Jack
70. August 15, 2009 - email from R. Flindall to M. Moran, Re: Untitled
71. August 15, 2009 - email from R. Flindall to S. Filman, Re: Stephen Tait
72. August 14, 2009 - email from R. Flindall to M. Johnston, Re: PC Jack
73. August 11, 2009 - email from R. Flindall to R. Campbell, Re: At Scenes Collision Investigation Course - PPA - October 19<sup>th</sup> through 23<sup>rd</sup>, 2009
74. August 10, 2009 - email from R. Flindall to R. Campbell, Re: Provincial Communication Centre Notification
75. August 6, 2009 - email from R. Flindall to M. Johnston, Re: P/C Michael Jack
76. August 2, 2009 - email from R. Flindall to M. Johnston, Re: Jeff Standaert
77. July 22, 2009 - email from R. Flindall to S. Schroter, Re: Can you look into something for me?
78. June 24, 2009 - email from R. Flindall to R. Campbell, Re: Driving Presentation Class List
79. June 7, 2009 - email from R. Flindall to M. Jack, Re: Occurrence addresses in Niche
80. June 1, 2009 - email from R. Flindall to M. Jack, Re: DAR's – Paid Duty
81. May 14, 2009 - reply email from R. Flindall to R. Campbell, Re: Jack's next evaluation
82. May 11, 2009 - email from R. Flindall to R. Campbell, Re: Jack's next evaluation
83. March 23, 2009 - reply email from R. Flindall to S. Filman, Re: Jack evaluation

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84. March 23, 2009 - email from R. Flindall to M. Johnston, Re: Jack evaluation
85. March 23, 2009 - original email from R. Flindall to R. Campbell, Re: Jack evaluation
86. March 19, 2009 - email from R. Flindall to R. Campbell, Re: Unit 01-152
87. March 9, 2009 - email from R. Flindall to M. Jack, Re: Sumilas, Shawn
88. February 13, 2009 - email from R. Flindall to M. Jack, Re: Talk Lock
89. February 10, 2009 – follow up email from R. Flindall to R. Campbell, Re: Domestic we spoke about earlier
90. February 10, 2009 - email from R. Flindall to S. Filman, Re: INC00000216708 Priority 4 – Minimal has been assigned to JUS MSG OPP RMS ADMIN
91. February 10, 2009 - email from R. Flindall to R. Campbell, Re: Domestic we spoke about earlier
92. January 30, 2009 - email from R. Flindall to R. Campbell, Re: Enr to a cruise MVC
93. September 23, 2009 - email from P. Butorac to M. Johnston, A. Crawford, Re: 254009-0173 Internal Complaint – PC Jack
94. December 24, 2008 - email from K. Chapman to S. Filman, R. Flindall, Re: Gun locker for Michael Jack
95. December 24, 2008 - email from K. Chapman to M. Jack, Re: Welcome to Peterborough w/ attached Welcome Jack document
96. July 31, 2009 - email from M. D’Amico to M. Johnston, Re: Jeff Standaert
97. May 11, 2009 - email from S. Filman to M. Jack and R. Flindall, Re: Jack 4 document
98. April 21, 2009 – email from S. Filman to R. Flindall, Re: Jack 1 document
99. March 13, 2009 - email from S. Filman to R. Flindall, Re: Ken Rusaw reviews
100. September 3, 2009 – email from S. Gozzard-Gilbert to R. Flindall, Re: Michael Jack’s PCS4
101. July 6, 2009 - email from S. Gozzard-Gilbert to J. Pollock, M. Jack, Re: Michael Jack working for John Pollock
102. January 16, 2009 - email from R. Flindall to M. Jack, R. Campbell, Re: Attendance for block training date RE: emergency dental appointment
103. January 14, 2009 - email from S. Gozzard-Gilbert to K. Raymond, R. Flindall, T. Banbury, B. Rathbun, P. Butorac, Re: Stats for New Recruits 2008
104. September 24, 2008 - email from S. Gozzard-Gilbert to R. Flindall, R. Campbell, M. Johnston, G. Smith, Re: New recruits
105. September 9, 2009 - email from M. Gravelle to R. Flindall, B. Rathbun, Re: Jack



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106. August 10, 2009 - email from M. Jack to M. Moran, C. Laperle, S. Filman, M. D'Amico, Re: SP09178964 B&E 06-Aug-09
107. August 3, 2009 - email from M. Jack to OPP DL Peterborough County Detachment, Re: Found fishing boat on Stoke Lake at Young's point
108. July 31, 2009 - email from M. Jack to R. Flindall, Re: Overtime SP09164458
109. July 31, 2009 - email from M. Jack to M. Johnston, Re: Jeff Standaert
110. July 29, 2009 - email from M. Jack to jsmith@kpf.ca, Cc'd R. Flindall, Re: Statement from Raoul Rochard Sahip Mohammed
111. July 24, 2009 - email from M. Jack to OPP DL Peterborough County Detachment, Re: RPG for arrest of John Derek Williamson
112. March 9, 2009 - email from M. Jack to C. Laperle, Cc'd R. Flindall, Re: Sumilas, Shawn
113. February 10, 2009 - email from M. Jack to R. Flindall, Re: INC000002167808 Priority 8 – Minimal has been assigned to JUS MSG OPP RMS ADMIN
114. August 15, 2009 - email from J. Payne to R. Flindall, Re: Jack's last evaluation
115. September 22, 2009 - email from J. Payne to R. Flindall, Re: Read this occurrence tonite
116. September 25, 2009 - Cover Memo w/ M. Jack's evaluation response

J OPP General Information Form Re: Michael Jack, Date: August 2-15, 2009

K OPP General Information Form Re: Michael Jack, Date: August 15, 2009

**DETACHMENT DOCUMENTS****VOLUME 2:****Peter Butorac**

- L 1. September 20, 2009 - email from R. Nie to P. Butorac, Re: PC Jack's 8mth evaluation
2. September 25, 2009 - email from R. Nie to R. Flindall and P. Butorac, Re: Jack
3. October 25, 2009 - email from R. Nie to R. Campbell, C. Kohen, P. Salter, P. Butorac, J. Postma and D. Lee, Re: Jack evaluation draft with attached Evaluation Report and Work Improvement Plans
4. September 14, 2009 - email from M. Johnston to R. Campbell, R. Flindall, R. Nie, C. Kohen, J. Postma, P. Butorac Re: Jack WIP masterc with attached Work Improvement Plan
5. September 18, 2009 - email from M. Johnston to R. Nie, Ccd P. Butorac, J. Postma, K. Chapman, Re: P/C Jack

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6. September 20, 2009 - email from M. Johnston to P. Butorac, R. Nie, R. Campbell, Re: P/C Jack **\*\*URGENT\*\***
7. September 14, 2009 - email from R. Campbell to M. Johnston, Cc C. Kohen, R. Flindall, R. Nie, J. Postma, P. Butorac, Re: Jack WIP (with attached Work Improvement Plan)
8. September 15, 2011 - email from R. Flindall to M. Johnston (forwarded to R. Campbell), Re: Clarification re PC Jack
9. September 1, 2009 email from M. Johnston to R. Flindall, R. Campbell, Re: PC Michael Jack
10. Undated - email from Ron (R. Campbell) to M. Johnston, D. Borton, Re: Moving of Cst. Mike Jack
11. Undated - OPP Briefing Note, Re: Cst. Jack
12. August 24, 2009 - email from J. Postma to R. Campbell, Re: Probationary Constable Michael Jack
13. General Information Form, R. Flindall Re. Cst. Jack
14. Undated – Confidential Duty Report, Submitted by J. Brockley

**Richard Nie**

- M Cst. Richard Nie Notes, September 2009
- N
1. August 18, 2009 - email from R. Campbell to R. Nie, Re: Moving of Cst. Mike Jack
  2. August 20, 2009 - email from R. Campbell to B. Lafrenier, R. Flindall, Cc: R. Nie, J. Postma, Re: Constable Mike Jack
  3. August 26, 2009 - email from J. Postma to R. Nie, Re: Probationary Constable Michael Jack
  4. August 27, 2009 - email from J. Postma to R. Campbell, Cc: R. Nie, Re: PC Jack
  5. August 27, 2009 - email from R. Campbell to R. Flindall, S. Filman, J. Postma, R. Nie, C. Kohen, M. Johnston, Re: PCS066 for Mike Jack
  6. August 28, 2009 - email from R. Campbell to J. Postma, Cc: R. Nie; Re: PC Jack
  7. September 8, 2009 - email from R. Campbell to D. McNeely, Cc: M. Jack, J. Postma, R. Nie, P. Butorac, D. Lee, C. Kohen, Re: Driving Assessment, Thursday 10 Sept 2009 – Kingston
  8. September 9, 2009 - email from R. Campbell to R. Flindall, R. Nie, Re: PCS66\_Jack (with attached Performance Evaluation Report)
  9. September 9, 2009 - email from R. Campbell to C. Kohen, R. Flindall, Cc: M. Johnston, D. Lee, R. Nie, Re: PCS66\_Jack

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10. September 11, 2009 - email from R. Campbell to R. Flindall, Cc: J. Postma, R. Nie, P. Butorac, M. Johnston, Re: Jack
11. September 11, 2009 - email from R. Campbell to M. Johnston, C. Kohen, R. Flindall, R. Nie, J. Postma, P. Butorac, Re: PCS66\_Jack8 (with attached Performance Evaluation Report-Report Month 7, Work Improvement Plan)
12. September 14, 2009 - email from R. Campbell to M. Johnston, Cc: C. Kohen, R. Flindall, R. Nie, J. Postma, P. Butorac, Re: Jack WIB masterc.doc
13. September 16, 2009 - email from R. Campbell to D. McNeely, Cc: J. Postma, P. Butorac, R. Nie, M. Johnston, Re: Ron-can you advise if everything is a go for Friday Driving assessment with Michael
14. September 18, 2009 - email from M. Johnston to R. Nie, Cc: P. Butorac, J. Postma, K. Chapman, Re: P/C Jack
15. September 20, 2009 - email from P. Butorac to M. Johnston, R. Nie, Re: P/C Jack \*\*URGENT\*\*
16. September 20, 2009- email from M. Johnston to P. Butorac, R. Nie, R. Campbell, Re: P/C Jack \*\*URGENT\*\*
17. September 24, 2009 - email from R. Flindall's personal email to R. Nie, Re: PC Jack WIP
18. September 29, 2009 - email from R. Campbell to P. Butorac, R. Nie, J. Postma, Re: FW: Driving assessment – Michael Jack – requires remedial driving
19. September 29, 2009 - email from R. Campbell to J. Postma, P. Butorac, R. Nie Re: FW: Driving assessment – Michael Jack – requires remedial driving
20. October 5, 2009 - email from K. Taylor to C. Kohen, Cc: R. Campbell, D. McNeely, R. Nie, Re: PC Michael Jack – Driving Remediation
21. October 5, 2009 - email from R. Campbell to K. Taylor, C. Kohen, D. Lee, R. Nie, P. Butorac, J. Postma, Re: Driving Memo – Michael Jack (with attached Memo dated October 2, 2009 and Driver Competency Assessment)
22. October 5, 2009 - email from C. Kohen to R. Campbell, D. Lee, R. Nie, P. Butorac, J. Postma, Re: Driving Memo – Michael Jack
23. October 5, 2009 - email from D. Lee to C. Kohen, R. Campbell, R. Nie, P. Butorac, J. Postma, P. Salter, Re: Driving Memo – Michael Jack
24. October 5, 2009 - email from R. Campbell to D. Lee, C. Kohen, R. Nie, P. Butorac, J. Postma, P. Salter, Re: Driving Memo – Michael Jack
25. October 5, 2009- email from R. Campbell to C. Kohen, R. Nie, P. Butorac, Re: Driving Memo – Michael Jack
26. October 8, 2009 - email from R. Campbell to C. Kohen, P. Butorac, R. Nie, J. Postma, D. Lee, P. Salter, RE: PC Jack evaluation draft (with attached Performance Evaluation Report-Month 9 and Work Improvement Plan)

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27. October 14, 2009 - email from K. Taylor to M. Jack, Cc: P. Butorac, R. Nie, C. Kohen, Re: Driver Training
28. October 27, 2009 - email from K. Taylor to R. Nie, Cc: R. Campbell, P. Butorac, C. Kohen, M. Jack, Re: Remedial driver training for PC Michael Jack
29. November 10, 2009 - email from R. Campbell to C. Kohen , R. Nie; Cc: D. Lee, D. Borton, P. Butorac, R. Flindall, Re: Prob Jack (with attached Performance Evaluation Report-Month 10 and Work Improvement Plan)
30. November 10, 2009 - email from C. Kohen to R. Campbell, R. Nie, Cc: D. Lee, D. Borton, P. Butorac, R. Flindall, K. Taylor, Re: Prob Jack
31. November 10, 2009 - email from K. Taylor to R. Nie, Cc: R. Campbell, C. Kohen, P. Butorac, M. Vanlanduyt, RE: PC Jack – PCS66P – Police Vehicle Operation
32. November 10, 2009 - email from R. Campbell to R. Nie, P. Butorac, Re: Updated comments. FW: Prob Jack
33. November 15, 2009 - email from P. Butorac to R. Nie, Re: Michael Jack remedial driver training
34. November 18, 2009 - email from J. Postma to R. Campbell, C. Kohen, Cc: P. Butorac, R. Nie, Re: Prob Jack
35. December 1, 2009 email from K. Taylor to D. Beckett, R. Nie, C. Kohen, P. Butorac, M. Jack, Re: Probationary Constable Michael Jack – Remedial driver training completion
36. December 14, 2009 email from C. Kohen to M. Reynolds, D. Lee, Cc: R. Nie, Re: PC Jack (with attached Release from Employment letter dated December 15, 2009)
37. December 16, 2009 email from R. Campbell to R. Nie, Re: Chronology

**Shaun Filman**

- O Detective Constable Shaun Filman Notes, March 2009 and June 2009
- P Probationary Constable Work Improvement Plans, Re: M. Jack

**DETACHMENT DOCUMENTS**

**VOLUME 3:**

**Staff Sergeant Michael Reynolds**

- Q S/Sgt. Reynolds Notes, December 2009
- R Memo to Cst. Jack, Re: Notice of Proposed Release from Employment, dated December 9, 2009

TAB	DOCUMENT
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- |   |  |
|---|--|
| S | Memo to Michael Jack, Re: Performance and Conduct Requirements of a Recruit Constable, dated August 28, 2008 |
| T | Undated - email from M. Reynolds to C. Kohen, D. Lee, Cc: H. Stevenson, Re: Prob Jack Notice Release         |

**Jamie Brockley**

- |   |  |
|---|--|
| U | <ol style="list-style-type: none"><li>1. Confidential Duty Report, Submitted on October 24, 2009</li><li>2. Will Say, Detective Constable Jamie Brockley</li></ol> |
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**Deputy Chief Firearms Officers, M.P. (Mike) Johnston**

- |   |  |
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| V | <ol style="list-style-type: none"><li>1. September 15, 2009 - email from R. Flindall to M. Johnston, Re: Clarification re PC Jack</li><li>2. October 2, 2009 - D. McNeely M. Jack Driving Memo to R. Campbell, text format</li><li>3. September 23, 2009 - email from M. Johnston to H. Stevenson Re: Com Centre</li><li>4. September 29, 2009 - email from R. Campbell to M. Johnston, D. Lee, Re: Driving assessment – Michael Jack – requires remedial driving</li><li>5. October 5, 2009 - email from R. Campbell to K. Taylor, C. Kohen, D. Lee, R. Nie, P. Butorac, J. Postma, Re: Driving Memo – Michael Jack (with attached D. McNeely M. Jack Driving Memo, dated October 2, 2009 and Driver Competency Assessment)</li><li>6. September 10, 2009 - email from C. Cox to R. Campbell, M. Johnston, Re: I have a question about one of our officers intercepting communications</li><li>7. September 23, 2009 - email from H. Stevenson to M. Graham, Cc: K. Smith, M. Armstrong, M. Johnston, RE: Old occurrence involving PC Jack</li><li>8. August 27, 2009 - email from R. Campbell to C. Kohen, M. Johnston, Re: PC Jack</li><li>9. September 11, 2009 - email from M. Johnston to H. Stevenson, Re: PC Michael Jack</li><li>10. September 9, 2009 - email from R. Campbell to R. Flindall, R. Nie, Re: PCS66_Jack8</li><li>11. September 11, 2009 - email from M. Graham to K. Smith, P. Beesley, P. Powers, M. Armstrong, H. Stevenson, C. Cox, M. Johnston, Re: PC Michael Jack</li><li>12. September 22, 2009 email from R. Flindall to T. Thompson, Cc: M. Johnston, Re: Com Centre</li><li>13. September 17, 2009 email from R. Flindall to T. Thompson, Cc: M. Johnston, Re: Com Centre</li><li>14. September 10, 2009 email from C. Cox to R. Campbell, M. Johnston, Re: Confidential Inquiry</li></ol> |
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**TAB DOCUMENT**

15. August 20, 2009 email from R. Campbell to B. Lafrenier, R. Flindall, Re: Constable Michael Jack
16. August 18, 2009 email from R. Campbell to K. Taylor, Re: HTA Charge against Mike Jack while operating force vehicle today
17. August 18, 2009 email from K. Taylor to R. Campbell, Re: HTA Charge against Mike Jack while operating force vehicle today
18. September 11, 2009 email from R. Campbell to Vi Grimmett, Re: Mussington
19. August 6, 2009 email from R. Flindall to M. Johnston Re: P/C Michael Jack
20. August 21, 2009 email from R. Campbell to M. Johnston, Re: Michael Jack Platoon D

**Ron Campbell**

- W
1. August 19, 2009 email from R. Campbell to J. Conway, M. Johnston, R. Flindall, S. Filman, Re: Possible charges against Douglas Anderson
  2. September 10, 2009 email from R. Campbell to M. Johnston Re Rob Flindall
  3. August 18, 2009 email from R. Campbell to M. Johnston, Re Moving of Cst. Mike Jack
  4. January 29, 2009 email from H. Stevenson to M. Johnston, R. Campbell, Re: New Recruits – Special Attention to Prob Period – Jack and Kovacs
  5. OPP Briefing Note Re: PC Jack
  6. September 14, 2009 - email from R. Campbell to M. Johnston, Cc: C. Kohen, R. Flindall, R. Nie, J. Postma, P. Butorac, Re: Jack WIP masterpc (with attached Work Improvement Plant (Jack))
  7. September 20, 2009 - email from M. Johnston to P. Butorac, R. Nie, R. Campbell, K. Chapman, R. Flindall, Re: P/C Jack \*\*URGENT\*\*
  8. September 20, 2009 - reply email from M. Johnston to P. Butorac, R. Nie, R. Campbell, K. Chapman, R. Flindall, Re: P/C Jack \*\*URGENT\*\*
  9. September 18, 2009 - email from M. Johnston to R. Nie, Cc: P. Butorac, J. Postma, K. Chapman, Re: P/C Jack
  10. September 14, 2009 - email from M. Johnston to R. Campbell, R. Flindall, R. Nie, C. Kohen, J. Postma, P. Butorac, Re: Jack WIP masterdc (with attached Work Improvement Plant (Jack))
  11. November 19, 2009 - email from R. Nie to C. Kohen, R. Flindall, Cc: P. Butorac, Re: Jack Chronology 09
  12. October 7, 2009 - email from R. Nie to R. Campbell, C. Kohen, P. Salter, P. Butorac, J. Postma, D. Lee, Re: PC Jack evaluation (with attached Jack Evaluation Report and WIP)
  13. September 25, 2009 - email from R. Nie to R. Flindall, Cc: P. Butorac, Re: Jack

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14. September 20, 2009 - email from R. Nie to P. Butorac, Re: PC Jack's 8mth evaluation

X S/Sgt. Campbell Notes, August - November 2009

**PC Jennifer Payne**

Y 1. September 10, 2009 - email from R. Campbell to J. Payne, Cc: R. Flindall, M. Johnston, Re: Notes Tracking Cst Jack's duties on A Platoon

2. September 22, 2009 – email from J. Payne to R. Flindall, Re: Read this occurrence tonite (with attached Occurrence Summary (SP05112642))

Z PC Payne Notes, June - August 2009

**Chronology Re: PC Michael Jack's performance**

AA Chronology #1

BB Chronology #2

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1. Ten Code Test, dated December 9, 2008
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3. Recruit Orientation Course, Cruiser Familiarization Check List, dated November 31, 2008
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12. Basic Constable Training Program Student Evaluation, September 3 – November 27, 2008 (Diploma Not Awarded)
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14. Recruit Leadership Assessment Tool
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16. Use of Force Instructor Evaluation Report, dated December 12, 2008 (with attached Gun Safety Rules, signed by PC Jack)
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18. Absence Reports:
  - A) Absence Report, August 2008
  - B) Absence Report, September 2008
  - C) Absence Report, October 2008
  - D) Absence Report, November 2008
19. Recruit Progress/Interview Reports:
  - A) Recruit Progress/Interview Report – Week 1, dated September 12, 2008
  - B) Recruit Progress/Interview Report – Week 2, dated September 12, 2008
  - C) Recruit Progress/Interview Report – Week 3, dated September 20, 2008
  - D) Recruit Progress/Interview Report – Week 4, dated September 26, 2008
  - E) Recruit Progress/Interview Report – Week 5, undated
  - F) Recruit Progress/Interview Report – Week 6, dated October 11, 2008
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  - K) Recruit Progress/Interview Report – Week 11, dated November 16, 2008 (2 copies – 1 dated, 1 undated)
  - L) Recruit Progress/Interview Report – Week 12, dated November 19, 2008
  - M) Recruit Progress/Interview Report – Week 13, undated



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20. Defensive Tactics Workshop Notification Form, dated November 11, 2008
21. Defensive Tactics Workshop Notification Form, dated October 8, 2008
22. Physical Feedback Profile
23. Documentation, Re: Swipe Card, dated received, September 30, 2008
24. S/Sgt. Colleen Kohen Notebook Notes and Description of Responsibilities

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5. OPC, Basic Constable Training Program, Student Evaluation, Re: M. Jack, September 3 to November 27, 2008
6. Basic Constable Training Program completion certificate, M. Jack, dated November 27, 2008
7. OPPA Recruit Leadership Assessment Tool, Re: M. Jack
8. MCSCS Absence Reports: September, October and November, 2008
9. M. Jack Memo to Sgt. Tozser, Re: Failing to sign the 23:00 sign-in sheet on Sunday 14-Dec-08, dated December 15, 2008
10. OSMH Memo to Class 411, dated Christmas 2008

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11. Probationary Constable Performance Evaluation Report – 2<sup>nd</sup> month, Re: M. Jack, dated May 11, 2009
12. Probationary Constable Performance Evaluation Report – 3<sup>rd</sup> month, Re: M. Jack, dated April 27, 2009
13. Probationary Constable Work Improvement Plans, Re: M. Jack, dated May 11, 2009
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  - Flexibility
  - Police Vehicle Operation
14. Probationary Constable Performance Evaluation Report, dated June 11, 2009
15. J. Fantino, OPP letter to C. Condon, University of Liverpool, dated May 26, 2009
16. C. Condon, University of Liverpool to J. Fantino, Re: Research Participation, undated
17. Probationary Constable Performance Evaluation Report, Re: M. Jack – 5<sup>th</sup> month evaluation, dated August 31, 2009
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22. Sgt. D. McNeely Memo to R. Campbell, Re: M. Jack Driver Competency Assessment, dated October 2, 2009 (with attached Driver Competency Assessment)
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28. Probationary Constable Performance Evaluation Report, Re: M. Jack – 11<sup>th</sup> month evaluation, dated December 14, 2009

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29. Probationary Constable Work Improvement Plan, Re: M. Jack, dated December 31, 2009
30. OPP, Career Development Bureau Memorandum to P/C Jack and Peterborough County Detachment, Re: Notice of Proposed Release from Employment, dated December 9, 2009
31. M. Jack Memorandum to Chief Superintendent M. Armstrong, Re: Resignation from the Ontario Provincial Police, dated December 15, 2009
32. August 19, 2008 - email from B. Rathbun to S. Haennel, Re: Mike JACK
33. August 8, 2008 - email from J. Whitney to B. Rathbun, Cc: S. Haennel, Re: JACK, Michael
34. August 15, 2008 - email from S. Haennel to B. Rathbun, Re: Mike JACK
35. September 4, 2008 – email from S. Haenne to B. Rathbun, Re: Michael Jack
36. J. Whitney Memorandum Re: JACK, Michael 080558, dated August 6, 2008
37. August 13, 2008 – email from S. Haennel to D. Traviss, D. Lapalme, Re: Candidate Michael Jack
38. August 5, 2008 – email correspondence between M. Johnston and B. Rathbun, R. Campbell, Cc: S. Thomas, Re: Upcoming recruit
39. August 6, 2008 – email from S. Thomas to S. Haennel, Cc: A. McCollum
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43. Jack, Ontario Constable Selection System, Consent and Release of Liability Form, dated March 30, 2008
44. Jack, Checklist of Mandatory Information
45. OPP, Recruitment, Driving Questionnaire, dated May 29, 2008
46. Constable Assessment, Pre-Background Questionnaire, Re: M. Jack, dated May 29, 2008
47. OPP, Career Development Bureau - letter to M. Jack Re: Ontario Association of Chiefs of Police (OACP), Constable Selection System (CSS) Testing Results, dated May 23, 2008 (with attached OACP Certificated of Results)

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48. Police Constable Selection, Applicant Survey Form – M. Jack
49. Michael Jack – Application for Constable/Cadet position, Cover Letter, Resume and References, dated March 31, 2008
50. June 2, 2008 email from M. Jack to S. Haennel, Re: Hello from Michael Jack
51. OPP, Career Development Bureau letter to M. Jack Re: Progression of the Recruitment Process, dated May 30, 2008
52. OPP, Career Development Bureau letter to M. Jack Re: Acknowledgement of Employment Application Receipt and Recruitment Process, dated April 11, 2008
53. OACP, Constable Selection System, Performance Declaration, Re: M. jack, dated may 29, 2008
54. OACP, Constable Selection System, Authorization From, Re: Research Use of Psychological Tests/Interviews/Evaluations – M. Jack, dated May 30, 2008
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58. September 23, 2009 - email from P. Butorac to M. Johnston, A. Crawford, Cc: R. Flindall, R. Campbell, Re: 254009-0173 Internal Complaint-PC Jack
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60. Professional Standards Bureau Investigation Report 2545009-0173
61. Memorandum to PC Jack, Re: Internal Complaint 2545009-0173, dated November 25, 2009

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1. Chapter 2: Law Enforcement, 2.51: Supervision – Member
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  - September 2008
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  - September 2008 - December 2009 Police Orders Excerpt

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- |     |   |
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| 3.  | Introduction, 0.1: Introduction to Police Orders <ul style="list-style-type: none"><li>▪ December 2009</li><li>▪ September 2008</li></ul>           |
| 4.  | Chapter 2: Law Enforcement, 2.51: Supervision – Member <ul style="list-style-type: none"><li>▪ September 2008</li><li>▪ December 2009</li></ul>     |
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| 7.  | Chapter 2: Law Enforcement, 2.2: Communications/Dispatch, September 2008  |
| 8.  | Chapter 6: Administration & Infrastructure, 6.4: Human Resources  |
| 9.  | Chapter 6: Administration & Infrastructure, 6.10: Professionalism in the OPP, September 2008  |
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5. OPC, Basic Constable Training Program, Student Evaluation, Re: M. Jack, September 3 to November 27, 2008
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| 6.  | Chapter 6: Administration & Infrastructure, 6.16: OPP Vehicles, September 2008  |
| 7.  | Chapter 2: Law Enforcement, 2.2: Communications/Dispatch, September 2008  |
| 8.  | Chapter 6: Administration & Infrastructure, 6.4: Human Resources  |
| 9.  | Chapter 6: Administration & Infrastructure, 6.10: Professionalism in the OPP, September 2008  |
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| 14. | Introduction, 0.1 Introduction to Police Orders, December 2009  |

**January 27, 2012, disclosure**

Subject: Jack: HRTO File: 2010-07633-I: Michael Jack v. HMQ Further disclosure  
Date: Fri, 27 Jan 2012 10:15:10 -0500  
From: [Lynette.D'Souza@ontario.ca](mailto:Lynette.D'Souza@ontario.ca)  
To: [dmclaugh@bell.net](mailto:dmclaugh@bell.net)

Good morning Mr. Tapp  
Attached you will find further disclosure with respect to the above-noted file.  
Thank you

**Lynette D'Souza**

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**Ministry of the Attorney General**  
**Legal Services Branch**  
**Ministry of Community Safety and Correctional Services**  
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Butorac Notes(1).pdf

**February 16, 2012, disclosure**

**From:** D'Souza, Lynette (JUS)  
**To:** 'LLOYD TAPP' <[dmclaugh@bell.net](mailto:dmclaugh@bell.net)>  
**Sent:** Thu Feb 16 16:38:09 2012  
**Subject:** HRT0 2010-07633-I: jack

Good afternoon Mr. Tapp

Attached you will find further disclosure from the OPP including the transcribed notes of Colleen Kohen.

Thank you

**Lynette D'Souza**

---

**Ministry of the Attorney General**

**Legal Services Branch**

**Ministry of Community Safety and Correctional Services**

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**3 Attachments**

Subject: RE: HRTO 2010-07633-I  
Date: Fri, 17 Feb 2012 09:34:49 -0500  
From: [Lynette.D'Souza@ontario.ca](mailto:Lynette.D'Souza@ontario.ca)  
To: [hrto.registrar@ontario.ca](mailto:hrto.registrar@ontario.ca)  
CC: [dmclaugh@bell.net](mailto:dmclaugh@bell.net)

Good morning

Attached you will find a copy of the Statement of Delivery – Form 23, with respect to the above-noted file.

**Lynette D'Souza**

---

**Ministry of the Attorney General**

**Legal Services Branch**

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2010-07633-I Jack Statement of Delivery.pdf

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Writer's Direct Line : (416) 326-1237

March 2, 2012

Mr. Lloyd Tapp  
252 Angeline Street North  
Lindsay ON K9V 4R1

**Via Courier**

Dear Mr. Tapp;

**Re: Michael Jack v. HMQ  
Tribunal File Number: 2010-07633-I**

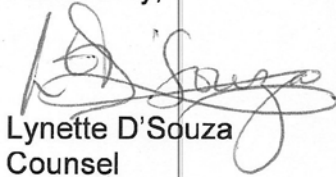
---

Enclosed you will find additional disclosure of arguably relevant documents from the OPP with respect to the above-noted matter.

The additional disclosure includes:

1. A Report list;
2. Richard Nie's preliminary forms/tasks; and
3. Jamie Brockley's notes.

Yours truly,

  
Lynette D'Souza  
Counsel

*Encl.*



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Writer's Direct Line : (416) 326-1237

March 9, 2012

Mr. Lloyd Tapp  
252 Angeline Street North  
Lindsay ON K9V 4R1

**Via Courier**

Dear Mr. Tapp;

**Re: Michael Jack v. HMQ  
Tribunal File Number: 2010-07633-I**

---

Enclosed you will find ongoing disclosure of arguably relevant documents from the OPP with respect to the above-noted matter.

The additional disclosure includes:

1. Colleen Kohen's schedule of evaluations;
2. Notes of Bruce Hanna,
3. Transcribed Notes of Ron Campbell, and
4. Michael Jack Notebook with relevant entries.

Yours truly,

Lynette D'Souza  
Counsel

*Encl.*

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March 20, 2012

Mr. Lloyd Tapp  
252 Angeline Street North  
Lindsay ON K9V 4R1

**Via Courier**

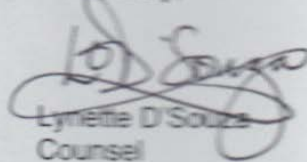
Dear Mr. Tapp:

Re: **Michael Jack v. HMQ**  
**Tribunal File Number: 2010-07633-I**

---

Enclosed please find the Respondent's Form 10-Request for a Case Management Conference, Request for a Case Management Conference Schedules and Book of Authorities, served upon you pursuant to the *Rules of Human Rights Tribunal of Ontario*.

Yours truly,

  
Lynette D'Souza  
Counsel

Encl.

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March 23, 2012

Mr. Lloyd Tapp  
252 Angeline Street North  
Lindsay ON K9V 4R1

**Via Courier**

Dear Mr. Tapp;

**Re: Michael Jack v. HMQ  
Tribunal File Number: 2010-07633-I**

---

Please find enclosed a copy of additional documents from the Ontario Provincial Police (OPP) produced to you in accordance with the OPP's on-going disclosure obligations. Enclosed you will find the following:

1. Analysis of case load
2. Notes of Jason Potsma
3. Email dated August 5, 2008
4. Documents relating to a criminal harassment incident
5. Documents relating to a motor vehicle incident
6. A 233-10
7. OPP orders from 2009

You will also find enclosed a copy of correspondence that we have provided to the Tribunal today.

Yours truly,

Lynette D'Souza  
Counsel

*Encl.*

cc. Human Rights Tribunal of Ontario

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March 23, 2012

**HAND DELIVERED**

**Richard Hennessy, Registrar**  
Human Rights Tribunal of Ontario  
655 Bay Street, 14<sup>th</sup> Floor  
Toronto, ON M7A 2A3

2012 MAR 23 PM 12:49  
REÇU  
T D P O  
H R T O  
RECEIVED

Dear Mr. Hennessy;

**Re: Michael Jack v. HMQ**  
**Tribunal File Number: 2010-07633-1**

---

Further to our correspondence of March 20, 2012 and March 21, 2012, this is to clarify that the version of Schedule 1 filed with the Tribunal on March 21, 2012 is different from the version that was delivered to Mr. Jack's representative. The differences arise from the reference and inclusion of information that is considered confidential. This information has not been referenced or included in the Schedule 1 provided to Mr. Jack's representative. For the completion of the Tribunal's record, please find attached a copy of the Schedule 1 that was delivered to Mr. Jack's representative.

Should you have further questions, please contact me at (416) 326-1237.

Yours truly,

A handwritten signature in black ink, appearing to read "Lynette D'Souza".

Lynette D'Souza  
Counsel

*Encl.*

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March 23, 2012

Mr. Lloyd Tapp  
252 Angeline Street North  
Lindsay ON K9V 4R1

**Via Courier**

**WITHOUT PREJUDICE**

Dear Mr. Tapp;

**Re: Michael Jack v. HMQ  
Tribunal File Number: 2010-07633-I**

---

Our client has advised that it is interested in participating in mediation with respect to the above-noted human rights file. Can you please advise if Mr. Jack would be interested in participating in mediation as well?

Yours truly,

A handwritten signature in black ink, appearing to read "Lynette D'Souza".

Lynette D'Souza  
Counsel

*Encl.*

cc. OPP Risk Management

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Writer's Direct Line : (416) 326-1237

April 2, 2012

Mr. Lloyd Tapp  
252 Angeline Street North  
Lindsay ON K9V 4R1

**Via Courier**

Dear Mr. Tapp;

**Re: Michael Jack v. HMQ**  
**Tribunal File Number: 2010-07633-I**

---

Please find enclosed the following arguably relevant documents delivered to you with respect to the above-noted matter:

- a. Detachment – Personal File
- b. Corporate- Personal File
- c. Corporate –Administration File
- d. Analysis of Probationary Constables (2009) Caseload
- e. Email dated August 10, 2009 from Mike Johnston
- f. C. Super. Mike Armstrong's Notes
- g. Analysis of Michael Jack's caseload 2009
- h. OPP orders
- i. P.C. Bruce Hanna's Notes transcribed
- j. Documents relating to Career and Professional Development Bureau
- k. Emails dated September 22, 2009
- l. Additional notes of Richard Nie
- m. Additional notes of S. Filman
- n. Chart showing Mr. Jack's overtime
- o. DAR Standardized Roster
- p. Email dated November 24, 2009
- q. Additional notes from Mr. Jack's notebooks that may be arguably relevant

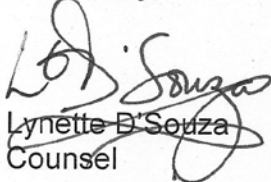
In response to your query regarding Mr. Jack's notebooks, these were reviewed with respect to arguable relevance to the proceedings, including the application and response. If there are specific notebook entries that Mr. Jack can recall that he thinks are relevant and that have not already been disclosed, please advise us as soon as possible.

The Ontario Provincial Police ("OPP") have had the opportunity to review your recent request for what appears to be all email correspondence from Mr. Jack's email account while he was a probationary constable. The OPP will not be producing the documents requested at this time for the reasons set out below.

1. These emails are not readily available as a server would have to be restored to obtain them.
2. The request is overbroad and amounts to a fishing expedition. There needs to be some arguable relevance between the documents being sought and the proceedings. The relevance of all these documents has not been shown.
3. In addition, such a request would be contrary to the principle of proportionality as applied in the context of documentary production. The principle of proportionality suggests that factors such as time and expense involved in production be considered in a just and expeditious determination of a proceeding.

If there are specific emails that Mr. Jack can recall that are arguably relevant with details including: date, recipient, and sender, the OPP may consider the future request.

Yours truly,

  
Lynette B. Souza  
Counsel

*Encl.*

cc. Human Rights Tribunal of Ontario

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Writer's Direct Line : (416) 326-1237

April 17, 2012

Mr. Lloyd Tapp  
252 Angeline Street North  
Lindsay ON K9V 4R1

**Via Courier**

Dear Mr. Tapp;

**Re: Michael Jack v. HMQ  
Tribunal File Number: 2010-07633-I**

---

We acknowledge receipt of your Request for an Order During Proceedings for Production, received in our office on April 10, 2012.

**PSB Interview with Mr. Jack**

Please find enclosed a cd with Mr. Jack's interview with the Ontario Provincial Police's Professional Standards Bureau.

**Mr. Jack's Officer Notebooks**

The Respondent maintains its position that it has disclosed all arguably relevant notebook entries from the Applicant's notebooks. However, the OPP is willing to provide the Applicant's full notebooks in un-redacted form, if the appropriate order from a Youth Criminal Justice Court is obtained authorizing the disclosure of any and all information pertaining to young persons in a manner consistent with the provisions of the *Youth Criminal Justice Act*. The Respondent further reserves its right to object to the admission of any notebook entries on the basis of relevance amongst other things.

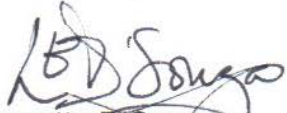
**Documents to be Relied Upon**

We have received approximately 123 documents from the Applicant. Can you please confirm that the Applicant intends on relying on all of the 123 documents?



If that is the Applicant's intention, as required under the *Tribunal's Rules*, can you please provide a consolidated list of all documents that the Applicant intends to rely upon.

Yours truly,

  
Lynette D'Souza  
Counsel

*Encl.*

cc. Human Rights Tribunal of Ontario

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Writer's Direct Line : (416) 326-1237

April 5, 2012

Mr. Lloyd Tapp  
252 Angeline Street North  
Lindsay ON K9V 4R1

**Via Courier**

Dear Mr. Tapp;

**Re: Michael Jack v. HMQ**  
**Tribunal File Number: 2010-07633-I**

---

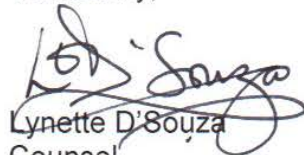
Please find enclosed the Respondent's Documents to be Relied Upon, Witness List and Witness Summaries delivered to you with respect to the above-noted file pursuant to the *Tribunal's Rules*.

Please note that the corporate Respondent, the Ontario Provincial Police, acknowledges that the term "Crazy Ivan" was used in the OPP Peterborough Detachment. The additional information relating to the use of this term was only provided after the filing of the Response (Form 2). At the time of the filing of the Response (Form 2), the Respondent's position accurately reflected the information available to it. Based on the Applicant's Application and will-say it appears that the Applicant only learned of the term "Crazy Ivan" after his resignation from the OPP.

Enclosed you will also find further disclosure of arguably relevant documents including:

- a. an email dated August 10, 2009; and
- b. OPP Corporate calculation of Mr. Jack's overtime

Yours truly,

  
Lynette D'Souza  
Counsel

*Encl.*

cc. Human Rights Tribunal of Ontario

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Writer's Direct Line : (416) 326-1237

April 20, 2012

Mr. Lloyd Tapp  
252 Angeline Street North  
Lindsay ON K9V 4R1

**Via Courier**

Dear Mr. Tapp;

**Re: Michael Jack v. HMQ  
Tribunal File Number: 2010-07633-I**

---

Please find enclosed the following documents delivered to you with respect to the above-noted matter:

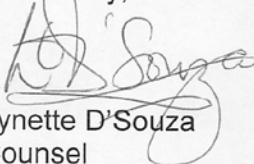
1. Request for an Order During Proceedings;
2. Response to a Request for an Order and;
3. Respondent's Casebook.

Also find enclosed a copy of a revised index for:

- a. Documents that are arguably relevant and,
- b. Documents to be relied upon

These indexes have been revised to remove all third party information. Please return all copies of our previous indexes to our attention as soon as possible so that they can be destroyed. The PSB investigation with Mr. Jack has now also been included on the index for documents to be relied upon.

Yours truly,

  
Lynette D'Souza  
Counsel

*Encl.*

cc. Human Rights Tribunal of Ontario

Ministry of the  
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Télécopieur: (416) 314-3518



Writer's Direct Line : (416) 326-1237

April 4, 2012

Mr. Lloyd Tapp  
252 Angeline Street North  
Lindsay ON K9V 4R1

**Via Courier**

Dear Mr. Tapp;

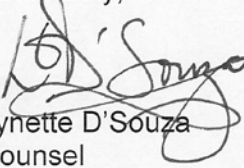
**Re: Michael Jack v. HMQ**  
**Tribunal File Number: 2010-07633-I**

---

Please find enclosed the following arguably relevant documents delivered to you with respect to the above-noted matter:

1. Additional Notes of Shaun Filman;
2. Additional Notes of Michael Jack;
3. Emails of Colleen Kohen; and
4. Additional Note of Richard Nie.

Yours truly,

  
Lynette D'Souza  
Counsel

*Encl.*

cc. Human Rights Tribunal of Ontario

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Writer's Direct Line : (416) 326-123

April 27, 2012

Mr. Lloyd Tapp  
252 Angeline Street North  
Lindsay ON K9V 4R1

**Via Courier**

Dear Mr. Tapp;

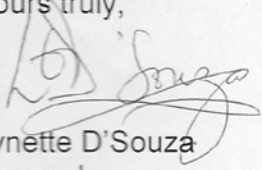
**Re: Michael Jack v. HMQ  
Tribunal File Number: 2010-07633-I**

---

Please find enclosed:

- a. a copy of an over-time chart for Mr. Jack during his probationary period;
- b. a further revised index for the Respondent's Documents to be Relied upon including the over-time chart; and
- c. a supplementary affidavit for the Respondent's Response to a Request for an Order delivered to you by letter dated April 20, 2012.

Yours truly,

  
Lynette D'Souza  
Counsel

*Encl.*

cc. Human Rights Tribunal of Ontario

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Writer's Direct Line : (416) 326-1237

May 14, 2012

Mr. Lloyd Tapp  
252 Angeline Street North  
Lindsay ON K9V 4R1

**Via Courier**

Dear Mr. Tapp;

**Re: Michael Jack v. HMQ  
Tribunal File Number: 2010-07633-I**

---

Enclosed please find an amended witness summary for Karen German.

Yours truly,



Lynette D'Souza  
Counsel

LD/tt

*Encl.*

cc. Human Rights Tribunal of Ontario