

**IN THE MATTER OF THE TORONTO EXTERNAL CONTRACTS INQUIRY**

**SUPPLEMENTARY AFFIDAVIT OF JEFFREY GRIFFITHS**

**I, JEFFREY GRIFFITHS, of the City of Toronto in the Province of Ontario,  
MAKE OATH AND SAY:**

**Background**

1. I have the following comments to make with respect to the evidence given by Wanda Liczyk:
  - a. I never had any discussion whatsoever with Wanda Liczyk regarding her relationship with Michael Saunders. She never told me that they were friends. She never told me that they had an intimate relationship. In fact the name Michael Saunders was never raised once in any discussions that I had with Ms Liczyk.
  - b. At no time prior to the switch from TXM2000 to TMACS occurring did Wanda Liczyk tell me about the history of the selection of TXM2000 over TMACS or the decision to switch from TXM2000 to TMACS.
  - c. It is possible (though I don't recollect it) that Ms. Liczyk at some point told me she was keeping a backup for the tax system or had a contingency plan. I am certain she did not provide me with any details as to the selection process in which the Treasurers and the Transition Team engaged in 1997. If she simply told me she was maintaining a back up system (without providing me any details of the selection process, that the "backup" involved the development

largely from scratch of a new system, and of the fact of her relationship with the developer Michael Saunders) I would have concurred with her plans as being appropriate and prudent in the circumstances.

- 2. In any case, it was not the function of the Audit Services Department generally, or my function as City Auditor specifically, to "approve" proposed courses of action or decisions made by departments. Nor did we have the authority to grant such approvals. In response to such requests we provided comments and advice if we were able, but not approvals. Decisions in regards to departmental issues are the responsibility of management and not the Auditor. This is an issue that has been raised throughout both Inquiries. It is my contention that this is a process that management are well aware of.
  
- 3. I make this affidavit in relation to the Toronto External Contracts Inquiry and for no other or improper purpose.

SWORN BEFORE ME at )  
 the City of Toronto in )  
 the Province of Ontario on )  
 November 24 , 2004 )



A COMMISSIONER, ETC.  
 Robert A. Centa

  
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 JEFFREY GRIFFITHS