

## IN THE MATTER OF THE TORONTO COMPUTER LEASING INQUIRY

### AFFIDAVIT OF STEVE HART

I, Steve Hart, of the City of Toronto, in the Province of Ontario, **MAKE OATH AND SAY:**

1. I have worked for the City of Toronto since 1992, and have worked at City Hall since October 1999. I am a Building Security Supervisor, Central Portfolio. I have knowledge of the facts set out in this affidavit.

2. I have read the affidavit of Emil Zamara and the exhibits attached thereto. I am familiar with the layout of Carpark #36, its entry and exit lanes, and its stairwells. I agree with the contents of his affidavit.

3. New City Hall consists of two towers flanking a Rotunda. The Rotunda has three floors above ground and one floor below ground.

4. Offices for the City Councillors and the Mayor are situated on the four outside walls on the second floor. I have attached a map of the Councillors' and Mayor's Offices to my affidavit as **Exhibit A**. Exhibit A identifies the location of each Councillors office in 1999.

5. In November 1999, the second floor of the Rotunda could be accessed in several ways:

- a) Stairwells from the lobby of City Hall accessible to the public (marked (A) on Exhibit A);
- b) Two public elevators from the lobby of City Hall (marked (B) on Exhibit A);
- c) Two banks of public elevators that run from the basement to the top of the east and west towers of City Hall (marked (C) on Exhibit A).

d) One "VIP" elevator from the basement of City Hall, accessible to the public (marked (D) on Exhibit A).

e) Stairwells:

i) From the basement, where an electronic access card was required to enter the second floor from the stairwell, but not to exit the second floor to the stairwell (marked (E) on Exhibit A).

ii) From the basement, where an electronic access card was not required to enter the second floor from the stairwell, but was required to exit the second floor to the stairwell (marked (F) on Exhibit A).

iii) From the ground floor, where an electronic access card was required to enter the second floor, but not to exit (marked (G) on Exhibit A).

6. The ground floor of the Rotunda contains the main lobby of City Hall. I have attached a map of the ground floor of the Rotunda to my affidavit as **Exhibit B**. The stairwells and elevators described above and marked in Exhibit A, are marked in the same fashion on Exhibit B.

7. The ground floor of the Rotunda has several main entrance doors, marked (H). Immediately south of the doors marked (H) is Nathan Phillips Square. This is best displayed on the map at Exhibit D to the affidavit of Emile Zamaria.

8. Immediately inside the doors marked (H) is a set of public stairs marked (J) running between the lobby and the basement.

9. There is a section of reserved parking for councillors and senior staff ("Councillors Parking") directly under the ground floor of the Rotunda. I have attached a map of the Councillors Parking, labelled Basement Key Plan area as **Exhibit C** to my affidavit. The Councillors Parking area is inside the circle displayed in the centre of Exhibit C.

10. Those stairwells and elevators described above and marked in Exhibit A and B that provide access to and from the basement are marked in the same fashion on Exhibit C.

11. I have marked an arrow on Exhibit C. The arrow indicates the location of the entrance from the Carpark #36 to the basement of the City Hall Rotunda.

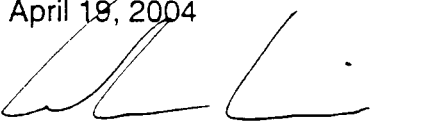
12. Carpark #36 lies directly south of City Hall and directly underneath Nathan Phillips Square. To represent the layout of this area, I have attached to my affidavit as **Exhibit D**, a map that combines Exhibit C to my affidavit with Exhibit D to the affidavit of Emil Zamiara.


13. As one walks south out of City Hall, one enters an area of parking reserved for City of Toronto employee parking. This area is bracketed and marked (I). The rest of the parking lot is available for public parking.

14. In November 1999, to access City Hall from the parking lot, a member of the public could have:

- a) Walked through the parking garage to the stairs and elevators marked in Exhibit C; or
- b) Gone up any of the stairwells from the parking lot to the ground level in Nathan Phillips Square and walked in the main doors of City Hall.

15. I have made this affidavit for the purposes of the Toronto Computer Leasing Inquiry and for no other purpose.

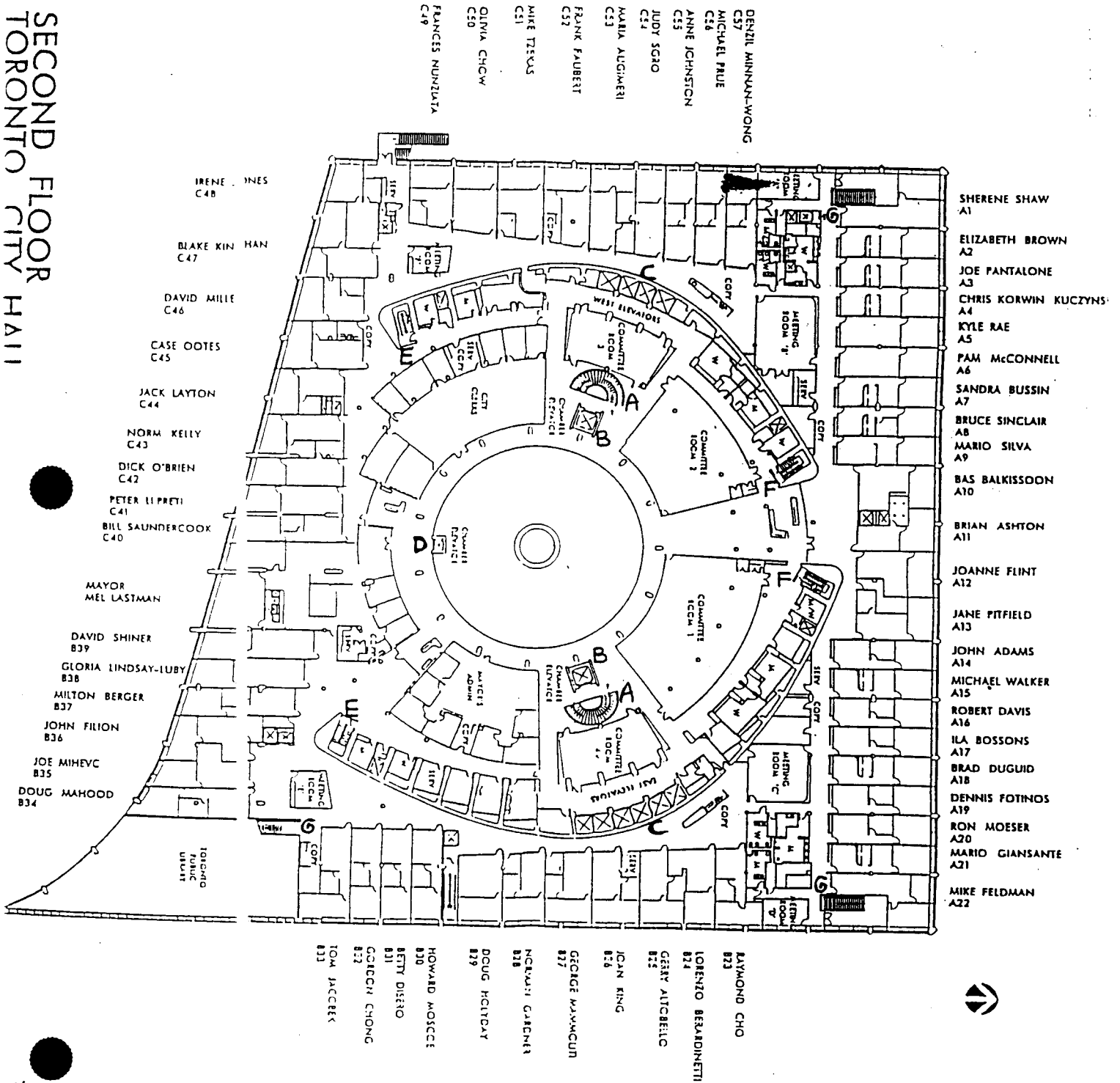
SWORN BEFORE ME at )  
the City of Toronto in )  
the Province of Ontario on )  
April 19, 2004 )  


  
\_\_\_\_\_  
STEVE HART

A COMMISSIONER, ETC.  
*Andrew Lewis*

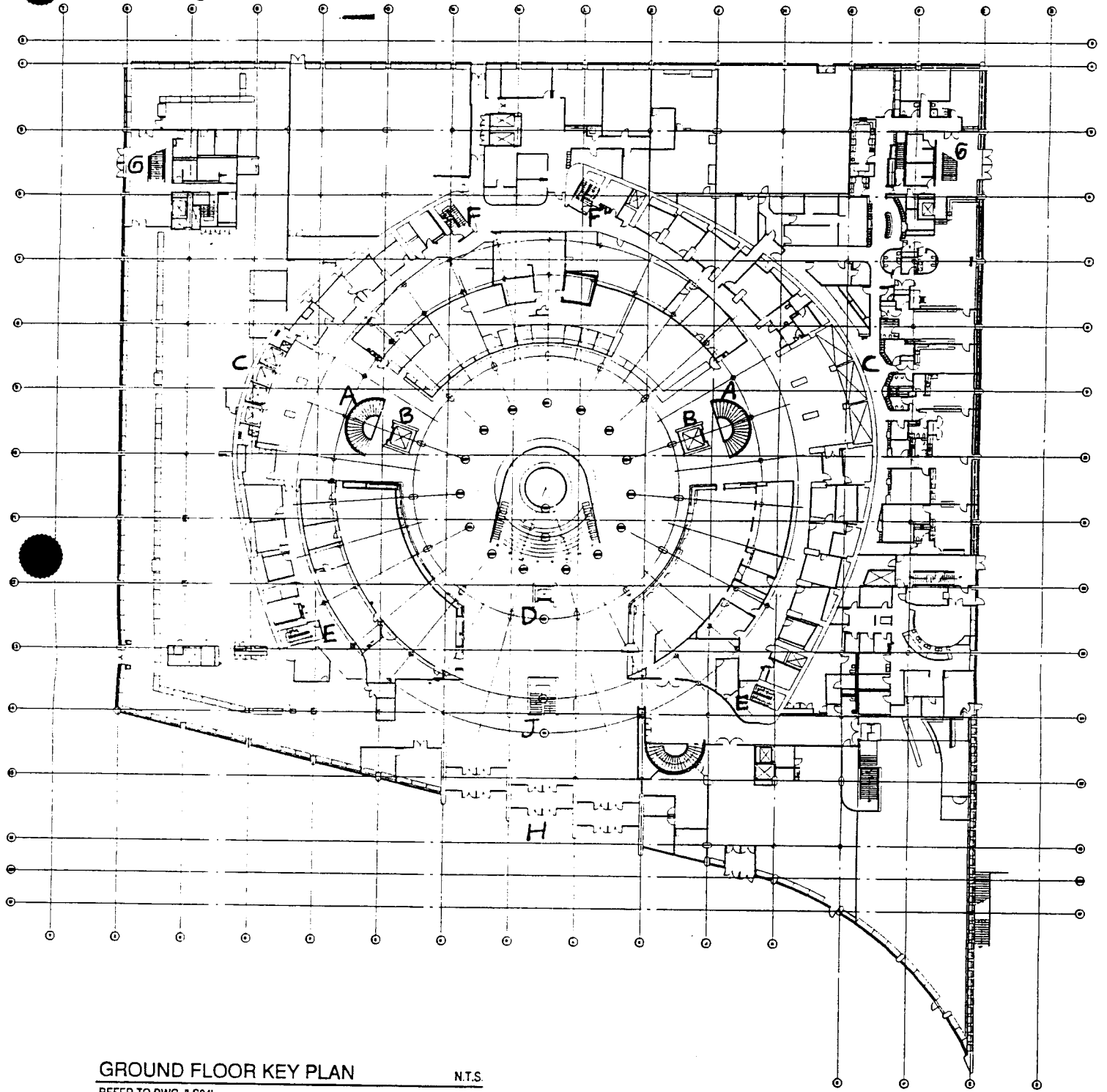
This is exhibit 17 to the affidavit  
of STEVE HART  
Sworn before me this 19<sup>th</sup> day of APRIL, 2004  
*Drew Lewis*  
A Commissioner, etc.,  
*Drew Lewis*

SECOND FLOOR  
TORONTO CITY HALL



This is a true and correct copy of the affidavit  
of STEVE HART  
Sworn to on the 19th day of APRIL, 2004

*Andrew Lewis*  
Commissioner, Alas,  
Andrew Lewis



**GROUND FLOOR KEY PLAN**

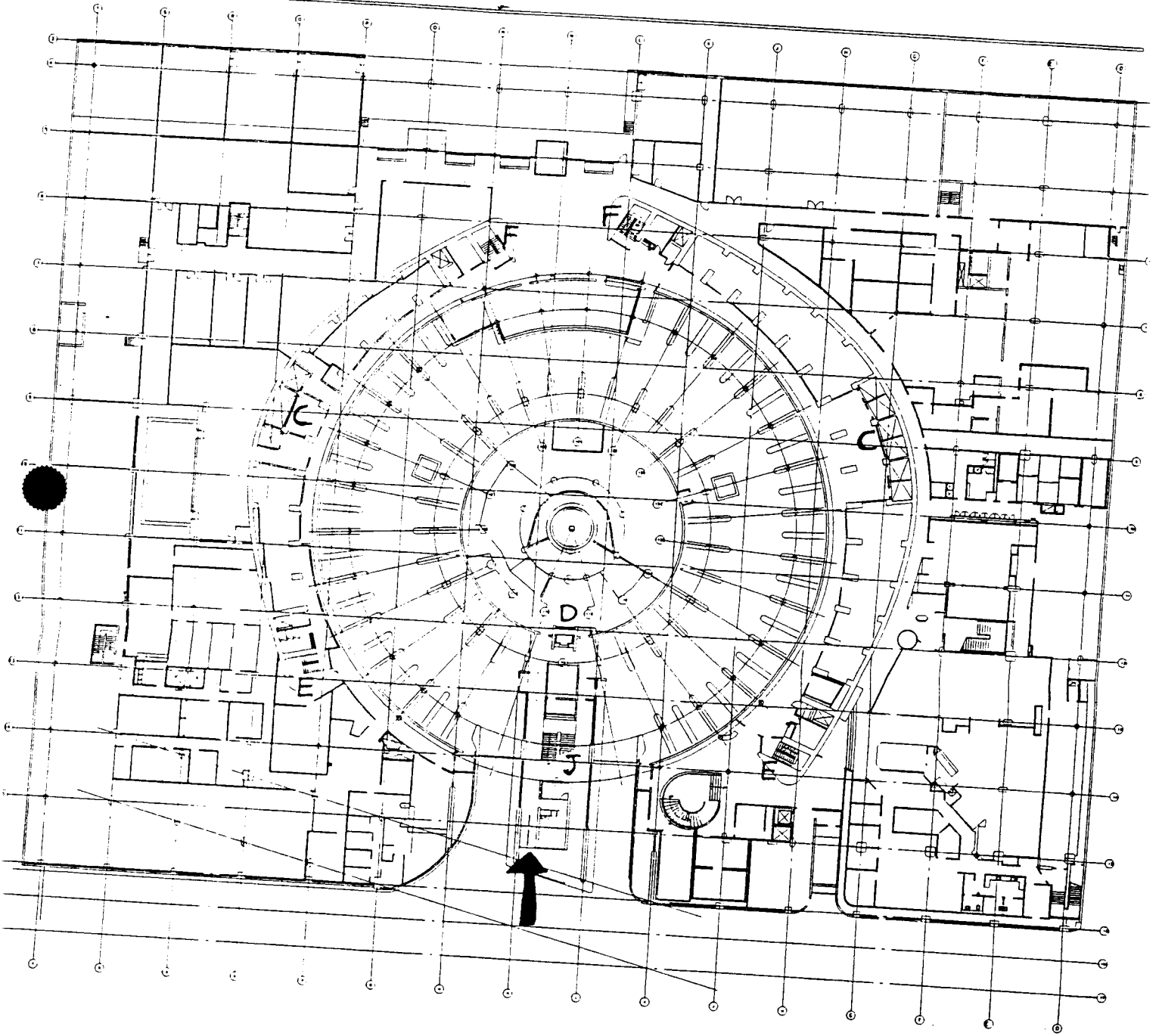
N.T.S.

REFER TO DWG. 1504

This is exhibit *C* to the affidavit  
of STEVE HART  
Sworn before me this 19th day of APRIL, 2004

A Commissioner, etc.,

*Andrew Lewis*



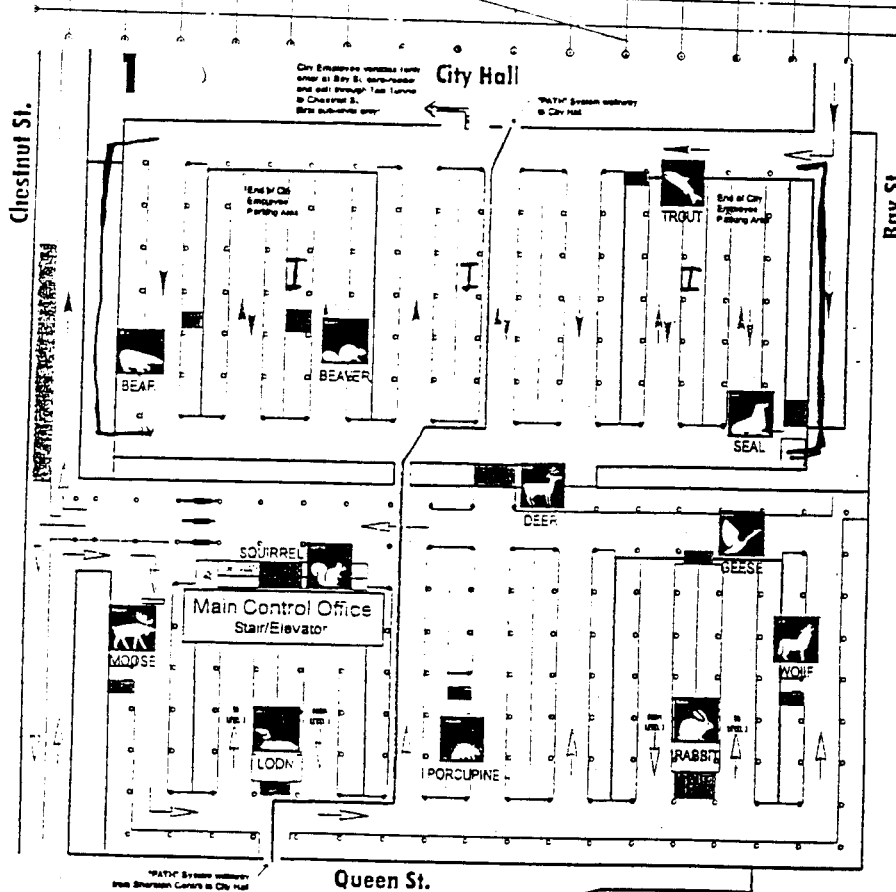
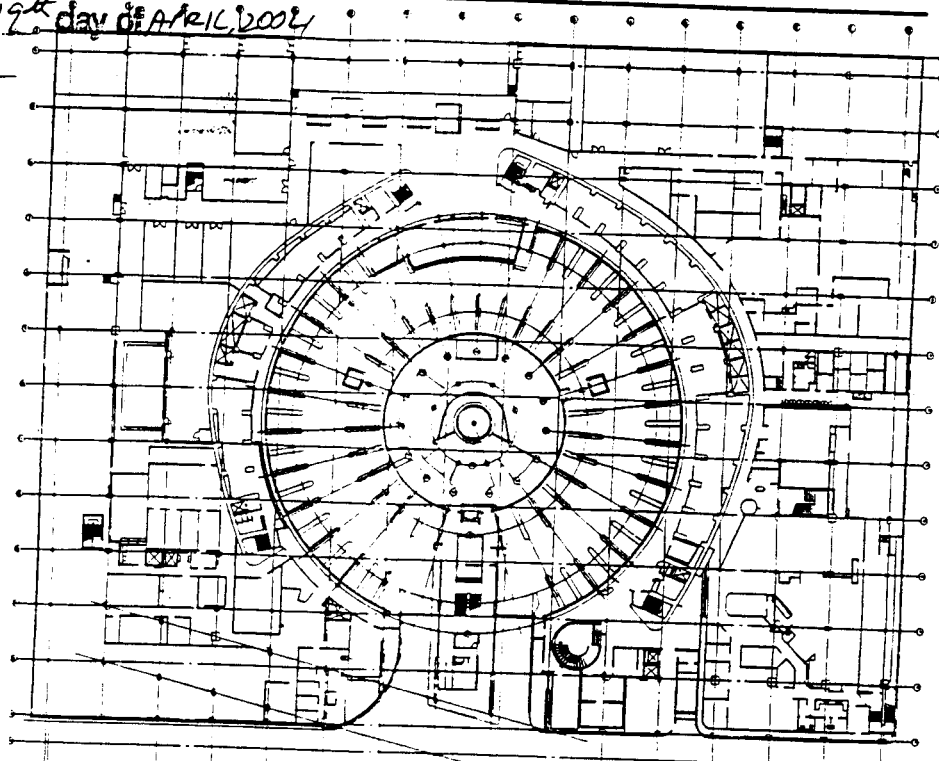
LEMENT KEY PLAN

REFER TO DWG. 'LS03'

N.T.S.

This is exhibit *D* to the affidavit  
of STEVE HART  
Sworn before me this 19<sup>th</sup> day of APRIL 2004

A Commissioner, etc.,  
Andrew Lewis



Nathan Phillips  
Square Garage

First Sub-Level  
showing animal icons for stalls

