

# CHAPNICK & ASSOCIATES

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March 15, 2013

Councillor Cesar Palacio  
Chair of the Licensing & Standards Committee  
Toronto City Hall  
100 Queen St. W.  
Toronto, ON M5H 2N2

**Re: Item LS 19.1  
Review of Adult Entertainment Club Regulations**

Dear Councillor Palacio and Committee Members:

I've been requested to provide a legal evaluation of the draft submission to the Licensing & Standards Committee (William H. Roberts).

I concur with Mr. Roberts that there is the potential of some most serious unforeseen impacts that are associated with the current staff report the way it is currently written.

I would direct the committee to take particular note of Mr. Roberts' opinion of a breach of Section 11 (1) of the City of Toronto Act. His suggestion of a review by the City's Legal Department before moving forward on this section of the report, is most sound.

I would also agree that there is a "failure of natural justice" which make the new regulations open to a Court challenge.

I have registered my name, as a deputant with the clerk, and plan to present the overall viewpoints and perspectives of the industry, along with their recommendations, at the committee meeting. I am confident that the committee members will review this matter accordingly.

Sincerely,

  
Paul Dineen

Cc: - Candy Davidovits – Clerk of the Committee  
- Licensing & Standards Committee Members