Barristers & Solicitors

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July 2, 2015

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File 16363.00002

VIA E-MAIL

Linda L. Gehrke
Lobbyist Registrar
Office of the Lobbyist Registrar
375 University Avenue, Suite 201
Toronto, ON M5G 2J5

Dear Ms. Gehrke:

**Re: Report to Council dated June 26, 2015 on an Inquiry into Contributions by Lobbyists to a Fundraiser for a Member of Council**

We have been provided with a copy of your Report dated June 26, 2015, which we understand will be considered by City Council at its meeting on July 7 and 8, 2015.

We are writing to express our client's concern about inaccurate statements contained in the Report, statements which our client was not given an opportunity to comment upon before the Report was finalized.

Page 18 of the Report contains the following comment:

> The information shows that Medallion contributed $7500 to the fundraiser. *Medallion initially provided a different explanation for the cheque, but later admitted that the cheque was in response to the fundraiser* [emphasis added].

On page 24, you go on to comment as follows:

> I accept as credible their evidence that they felt they could not refuse the request to make a contribution, even though they were not comfortable with it. *However, it is a matter of concern that Medallion initially provided an alternate explanation for the cheque*, and only later admitted that the cheque was in response to the fundraiser [emphasis added].

The italicized statements are incorrect.

When Stephen Littlejohn first contacted Medallion he inquired about a cheque for $2,034 issued April 25, 2013. A copy of Mr. Littlejohn's letter to Howard Paskowitz dated November 24, 2014 is attached. The explanation Medallion provided was in relation to that cheque, and it was accurate – namely that the cheque was payment for an invoice for services issued by [redacted] for an event held at a Medallion Corporation property at 45 Lisgar Street. A copy of Mr. Paskowitz's letter to Mr. Littlejohn is also attached.

It was not until Mr. Littlejohn interviewed Nathan Bleeman and Howard Paskowitz of Medallion on May 7, 2015 that Mr. Littlejohn asked about the $7,500 cheque. During those interviews both Mr. Bleeman and Mr. Paskowitz were forthright about the $7,500 cheque and acknowledged that it related to the fundraiser.

Contrary to what is stated in the Report, Medallion never provided an "alternate" or "different" explanation for the $7,500 cheque.

We note that the statements quoted above were not included in the draft findings that your office provided to us for comment on May 20, 2015. As a result, Medallion was not afforded an opportunity to respond to these inaccurate statements. This is particularly troubling given that you appear to have placed considerable reliance on the allegation that Medallion provided a different explanation for the $7,500 cheque in coming to your findings. We submit that this was a denial of procedural fairness.

We understand that the Report has already been provided to Members of Council. The comments referred to above are extremely damaging to Medallion's reputation with Council. Accordingly, we ask that you immediately excise the comments from the Report and issue a correction to all Members of Council. Given the denial of procedural fairness we also submit that you should reconsider your findings and disposition in relation to Medallion.

We look forward to hearing from you.

Yours truly,

**WeirFoulds LLP**

Kim Mullin

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Encl.
c: Stephen Littlejohn
client

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