



Raising the Alarm

Fraud Investigation of a Vendor Providing Life Safety Inspection Services to the City of Toronto

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Outline

1. Background
2. Fraud Investigation Process Overview
3. Investigation and Results
 - A. Management Investigation and Results
 - B. AG Investigation of Complaint
 - Investigation Challenges
 - C. AG Findings
4. Recommendations
5. Next Steps – Management Action

Background

Why this Fraud Investigation is Important

1. Potential fraud involving life safety systems

Raises concerns about the City's (building owner's) responsibility to ensure life-safety systems are in place and the Fire Code is complied with

2. Raises awareness for others using this contractor

3. Opens the conversation regarding opportunities for improvement in the life safety industry across Ontario

Complaint

May 21, 2017

Facilities Management became aware a complaint from PMMD about

- **York Fire,**
- **Advance Fire** and
- **Advanced Detection Technologies Corp**

▶ the companies were overcharging or charging for work not done

▶ A Facilities Management Life Safety Supervisor "*had been aware of all of these challenges with the vendor and [the complainant] is unsure if anything was done to rectify the issue.*"

▶ "*Other municipalities have cancelled contracts with this firm for fraudulent activity*".

Complaint (cont'd)

June 2, 2017: complainant provides additional information to PMMD. PMMD wrote to senior management staff of Facilities Management:

“... the information [the complainant] is providing is and could be a health and safety risk to the City.”

He advised me this morning that when annual inspections are to be completed any documentation confirming the inspections of the sprinklers, hydrostatic test, and flow???, are not in fact completed.

Complaint also alleged that company forged technicians names on reports, unaware to the technicians.

What is a Life Safety System?

Life safety systems are mandatory under the National Building Code of Canada. They are any interior building element designed to protect and evacuate the building population in emergencies, including fires and earthquakes, and less critical events such as power failures.

- ▶ Smoke alarms
- ▶ Fire extinguishers
- ▶ Emergency lighting and exit signs
- ▶ Sprinklers
- ▶ Fire pumps
- ▶ Smoke control and smoke venting equipment, including fans and dampers
- ▶ Hold-open devices and electromagnetic locks

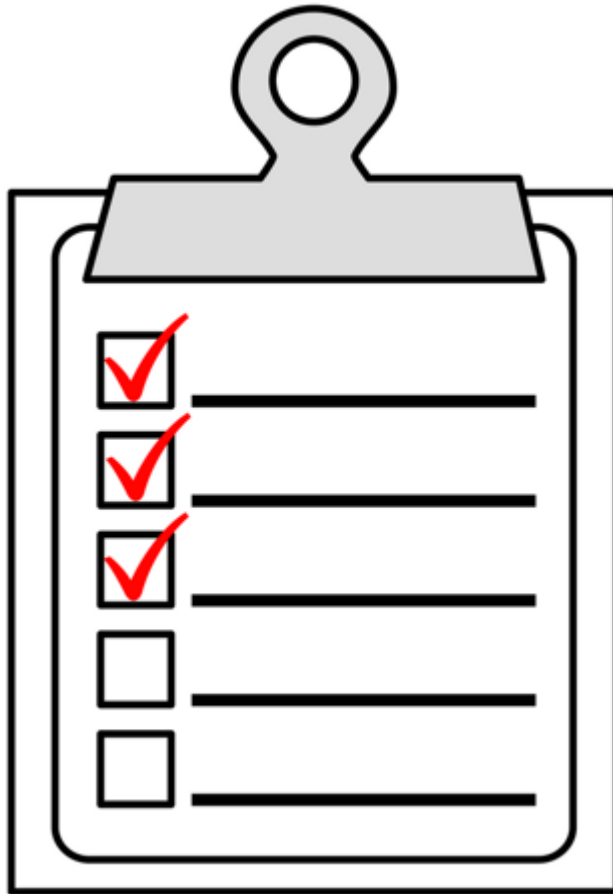
Source <https://www.britannica.com/technology/life-safety-system>

Why life safety systems are important

- ▶ The failure to enforce the Ontario Fire Code is an impediment to “the ability of firefighters to engage successfully in suppression and rescue.”
- ▶ “Improper functioning of fire safety equipment such as emergency power, fire alarms and fire pumps” are conditions that can exacerbate fire situations and increase the risk faced by firefighters.

-Hon. John Webber, 1983 ‘Report of the Public Inquiry into Fire Safety in Highrise Buildings’

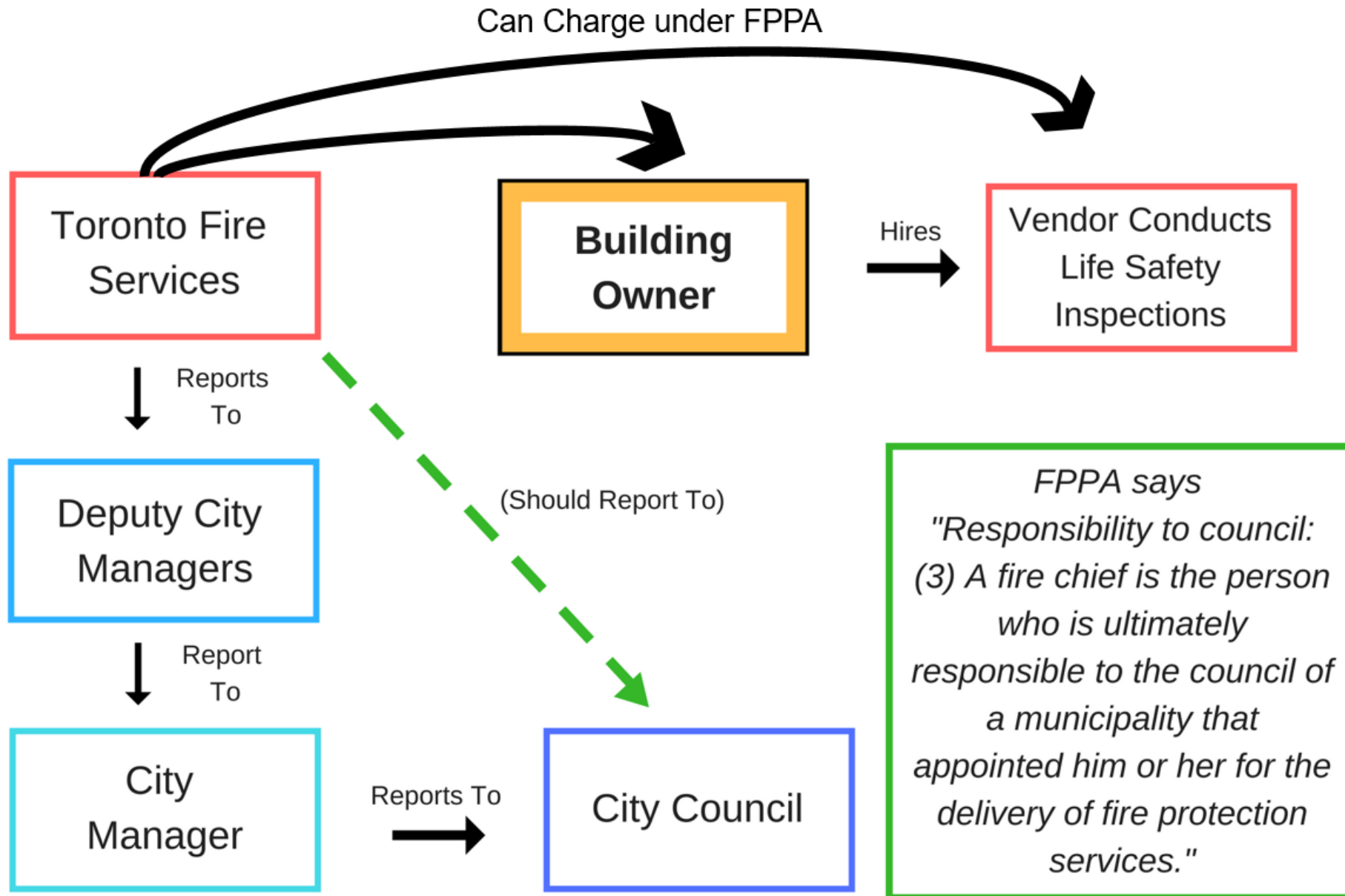
Example: Life Safety Checklist



Life safety is the building owner's responsibility. A checklist says how often specific life safety equipment must be tested, and includes the Fire Code reference:

- ▶ Daily
- ▶ Weekly
- ▶ Monthly
- ▶ Every 2 Months
- ▶ Every 3 Months
- ▶ Every 6 Months
- ▶ Annually
- ▶ Every 2 Years
- ▶ Every 3 Years
- ▶ Every 5 Years
- ▶ Every 6 Years
- ▶ Every 12 Years
- ▶ As Required

Roles and Responsibilities – Life Safety Systems



Qualifications & Licence

- ▶ Section 1.2 of Division C of the Ontario Fire Code sets out qualifications for persons performing tests, inspections and maintenance on fire alarm systems and interconnected smoke alarm systems.
- ▶ As of 2017, there is also a requirement for qualifications of persons performing work on sprinklers.
- ▶ There are no similar criteria for persons performing service maintenance on other systems such as emergency power, emergency lighting, and extinguishing systems (besides sprinklers).

Who Was the Complaint About?

Company	Service	Date of Contracts	
Advance Fire Control	<ul style="list-style-type: none"> • Fire Alarm, <u>Sprinkler/Standpipe Systems</u> • Fire Extinguisher Inspection, Hydrostatic Testing and Replacement 	<ul style="list-style-type: none"> • July 2008 • March 2009 • May 2011 	<ul style="list-style-type: none"> • 9 contracts awarded in total over the period 2008-2014 with various Divisions
York Fire Protection	<ul style="list-style-type: none"> • <u>Fire Alarm</u>, Sprinkler/Standpipe Systems including Fire Pumps and <u>Fire Hydrants</u> • <u>Emergency lighting</u> unit testing and inspections 	<ul style="list-style-type: none"> • August 2014 • July 2015 	<ul style="list-style-type: none"> • 2 contracts awarded over the period 2014-2017 for Toronto Water Division and Facilities Management Division
Advanced Detection Technologies	<ul style="list-style-type: none"> • Fire Alarm, Sprinkler and <u>Standpipe Systems</u> 	<ul style="list-style-type: none"> • May 2018, but contract was subsequently stopped 	<ul style="list-style-type: none"> • Submitted bid in May 2015 for Facilities Management contract but did not win

Fraud Investigation Process

- 1,000+ allegations each year

Complaint
forwarded to
Management

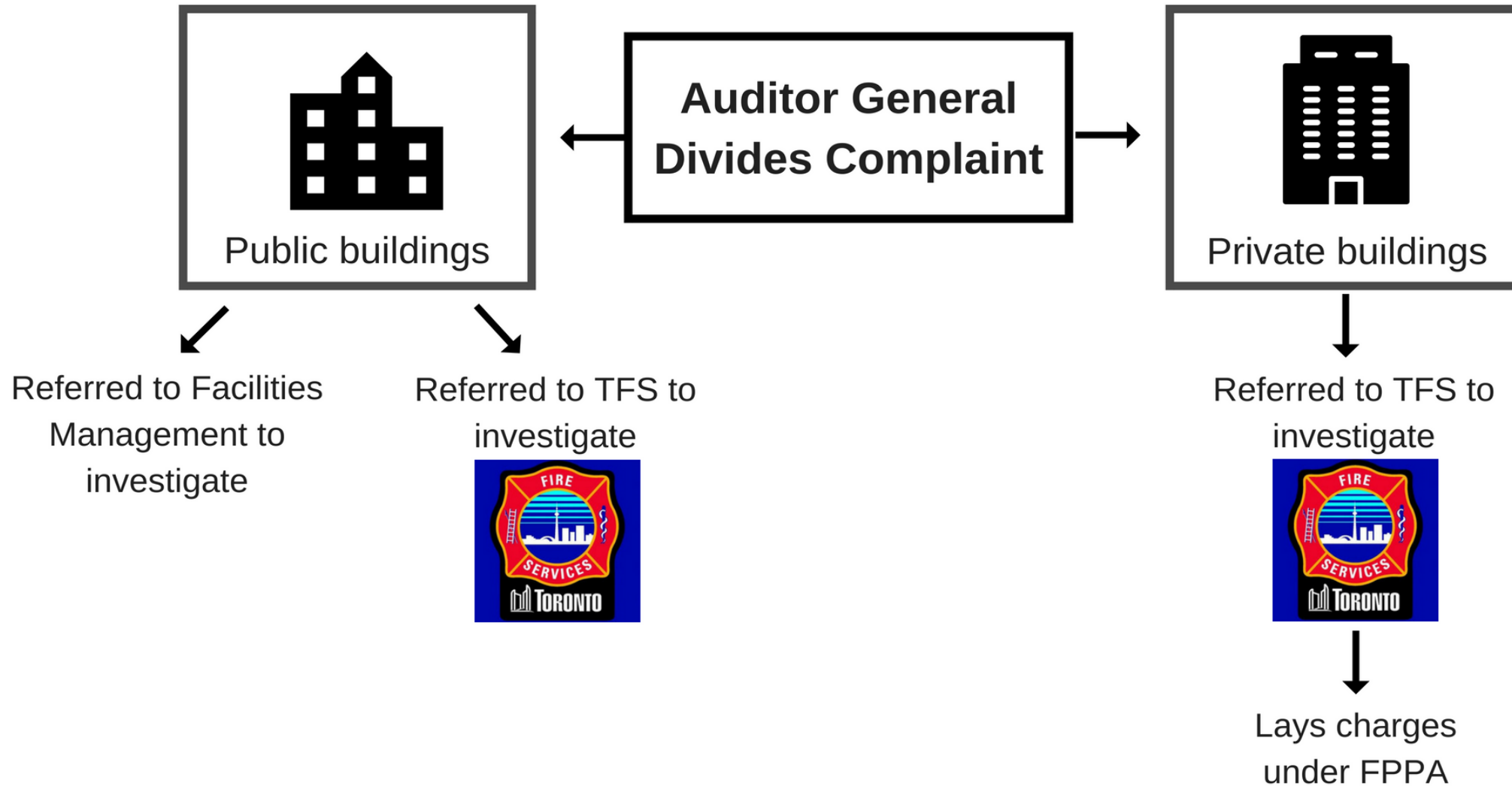
Management
conducts first-
line
investigation

Management
reports back to
AG

AG evaluates
response

AG conducts
further work if
not satisfied

Managing This Investigation



Results of Management's Investigation

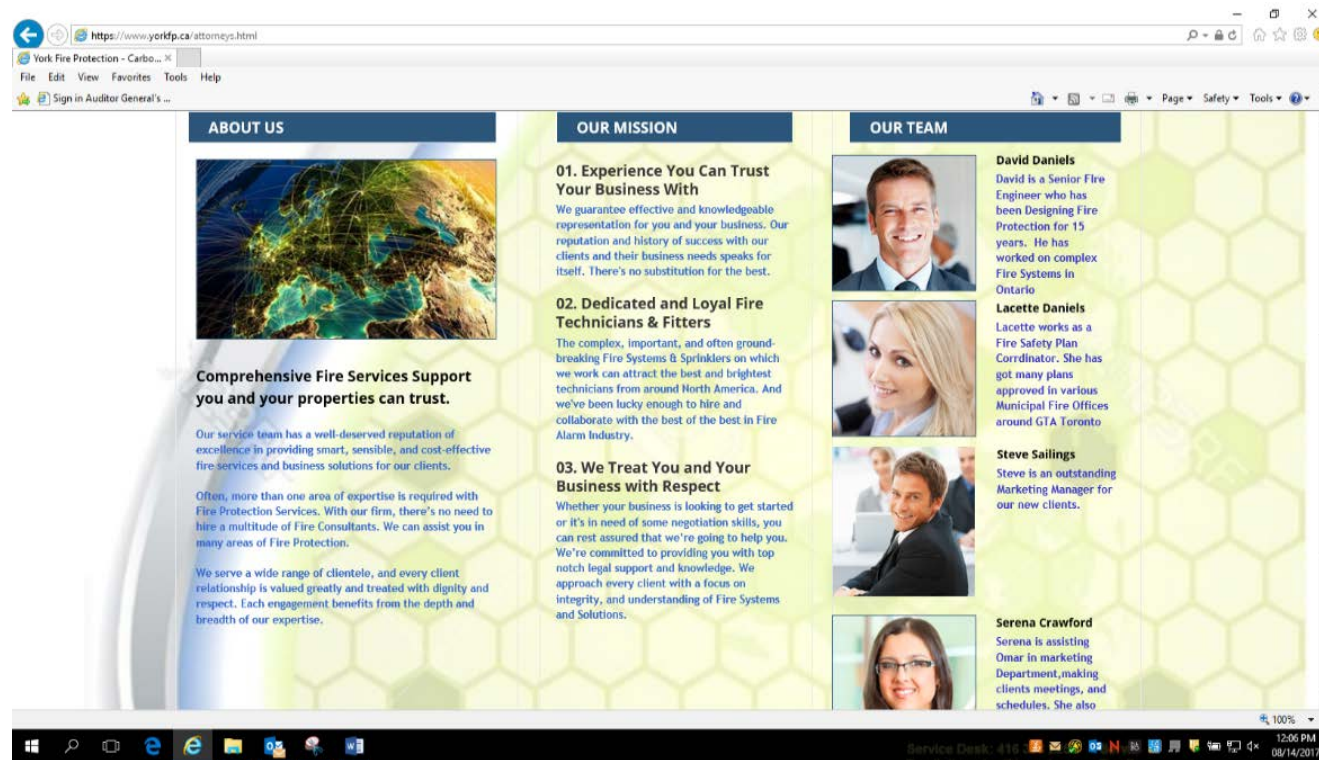
- ▶ July 2017 – Facilities Management suspended the contract pending a process review
- ▶ August 17, 2017 – Facilities Management summarized a meeting with the AG that after:
 - *“Reviewing multiple invoices there **was no indication of any mishandling.***
 - *“**No invoices were paid, unless an inspection report is provided by York and matched with their invoice”***

FM Reported They Follow 3-way Match Process Prior to Payment

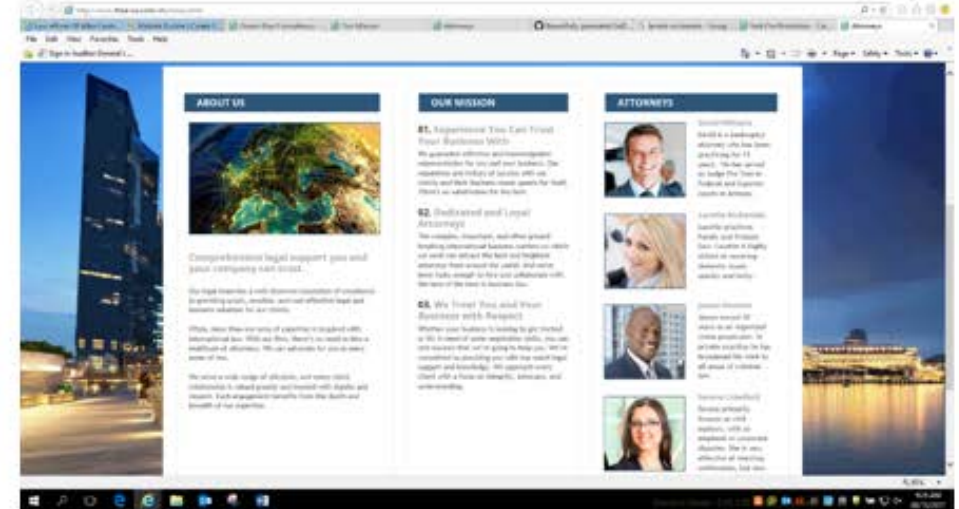
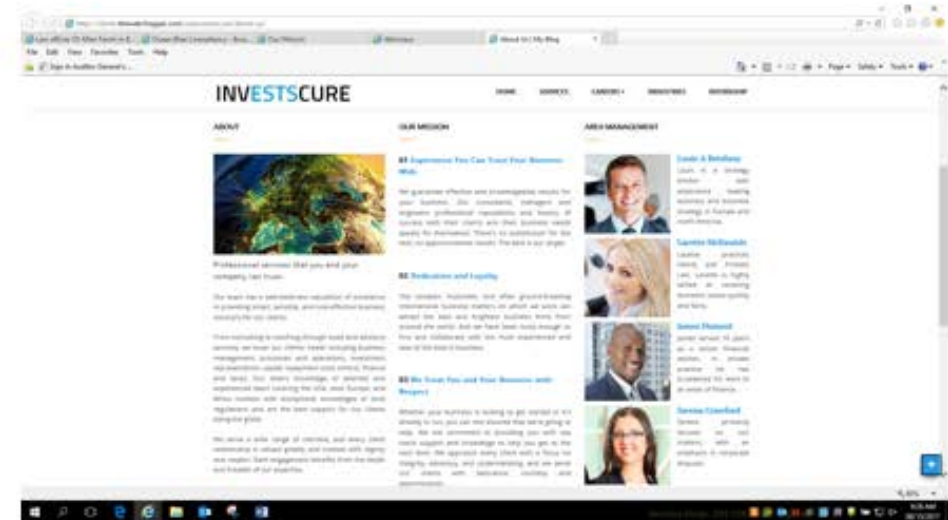
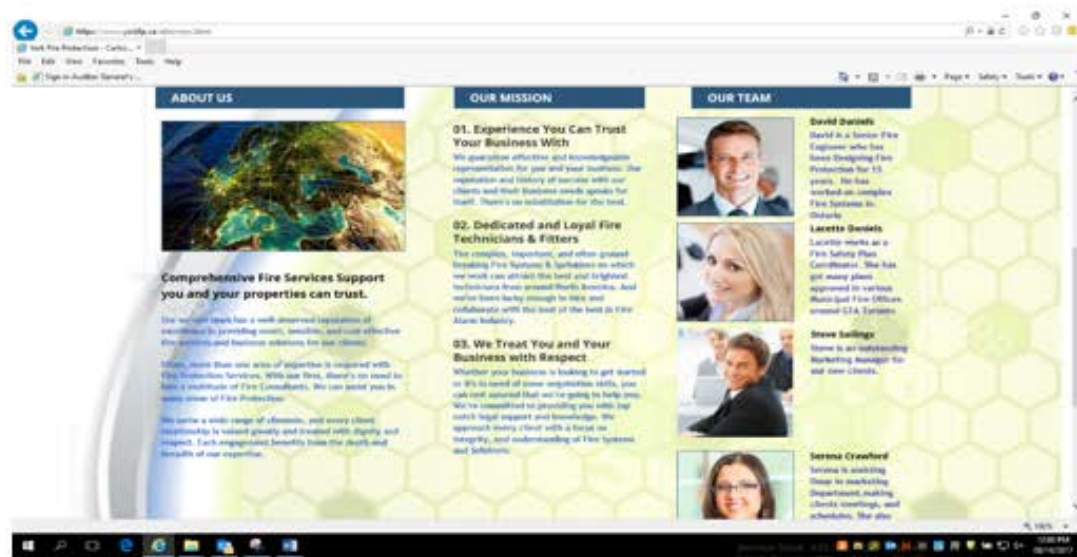


AG Shared Preliminary Review With Management:

- York Fire website was using stock photos



Other Sites Using Same Photos



Stock Photos – Risk of False Identities

York Fire website as at August 14, 2017:

OUR TEAM



David Daniels

David is a Senior Fire Engineer who has been Designing Fire Protection for 15 years. He has worked on complex Fire Systems in Ontario



Lacette Daniels

Lacette works as a Fire Safety Plan Coordinator. She has got many plans approved in various Municipal Fire Offices around GTA Toronto



Steve Sailings

Steve is an outstanding Marketing Manager for our new clients.



Serena Crawford

Serena is assisting Omar in marketing Department, making clients meetings, and schedules. She also

Other websites with the same images and similar names as at August 14, 2017:

ATTORNEYS



David Williams

David is a bankruptcy attorney who has been practicing for 15 years. He has served as Judge Pro Tem in Federal and Superior courts in Arizona.



Lacette McDaniel

Lacette practices Family and Probate Law. Lacette is highly skilled at resolving domestic issues quickly and fairly.



James Dumont

James served 10 years as an organized crime prosecutor. In private practice he has broadened his work to all areas of criminal law.



Serena Crawford

Serena primarily focuses on civil matters, with an emphasis in corporate disputes. She is very effective at reaching settlements, but also has an excellent trial record.

OUR CONSULTANTS



David Williams

David is an Operations consultant who has been practicing for 15 years. He has served as advertising consultant for leading agencies in Asia.



Lacette McDaniel

Lacette is a Sales specialist with over 20 years in Banking industry. Christina is highly skilled at identifying domestic & International sales opportunities issues quickly and fairly.



James Dumont

James served 10 years as an organized Lean Management consultant. His area of expertise is in maximizing areas of opportunities.



Serena Crawford

Serena primarily focuses on business start up. Understanding business areas & competitors. Her specialism is in Political, Economical, Sociological, Technological factors for International businesses.



Louis A Betchem

Louis is a strategy thinker with experience leading business and business strategy in Europe and north America.



Lacette McDaniel

Lacette practices Family and Probate Law. Lacette is highly skilled at resolving domestic issues quickly and fairly.



James Dumont

James served 10 years as a senior financial adviser. In private practice he has broadened his work to all areas of finance.



Serena Crawford

Serena primarily focuses on civil matters, with an emphasis in corporate disputes

AG Investigation: 3 Lines of Inquiry

A. Verify those bidding are legitimate

B. Verify inspections were completed prior to payment:

- Sample invoices & discuss with staff signing that the work was complete
- Fire Chief asked to review buildings to ensure life safety work is completed

C. Undertake Company Searches – “Know your Vendor”

Line of Inquiry 1: Bid Review

1. Recent bid showed two of the companies listed in complaint.

York's bid was the lowest of the three

- York: \$94,300
- Company X: \$135,600
- Advanced Detection Technologies: \$259,600

2. Noticed signatures looked like the same handwriting



Officer Williams



Signing Officer for Company

3. Noticed names looked unusual

➤ Dave Daniels, Jason Peters, David Williams

Line of Inquiry 2: Invoice Verification

- Selected 105 invoices of about 1,400 invoices

Contract	Division	Sample Size	Supporting documents found (inspection reports, service reports, etc)
Emergency Lighting	Facilities Management	88	46 invoices or 52%
Fire Alarms, testing sprinkler/standpipe systems including fire pumps and fire hydrants	Toronto Water	17	Some support for all

November 23, 2017:

AG Follows-up with Management to find invoices

Senior Management affirmed:

“Facilities followed the standard Accounts Payable process, receive invoice, match to Contract Release Order and then Goods received is completed by Supervisor for it to be paid.”

FM noted that from time to time, **some** supporting documents like packing slips **may** have been left on site, and **occasionally** some supporting documents were contained in emails from staff as opposed to being retained in a centralized location.

December 20, 2017: TFS Notifies Management that Advance Fire Control / York Fire are Issued Notices of Violations

► City Manager and Deputy City Managers

*“TFS issued a Notice of Violation to **Advanced Fire Control**, on December 14, 2017. In addition, TFS will be swearing an Information alleging a number of violations contrary to the FPPA with respect to inspection, tests and maintenance of fire protection systems involving Advanced Fire Control in the coming days.*

*We are aware that certain City Divisions have previously, and potentially have currently, retained **Advanced Fire Protection Systems/York Fire Protection** to perform inspections, tests and maintenance of fire protection systems in City owned and/or occupied buildings.*

I am bringing this to your attention so that City Divisions are fully aware of relevant information in making purchasing decisions and for managing contracts with suppliers.”

► AG not notified by Mgt

Toronto Fire Also Had Difficulty Finding Records

Per the Fire Code, records are to be produced on request.

January 31, 2018: Deputy Chief writes to Senior Facilities Management

- *“TFS is still experiencing significant challenges in obtaining information we need to close our inspection dating back to October 2017 for this property.”*

February 6, 2018: Follow-up

- *“As I noted at this time, it does not appear to TFS staff that the third parties retained under the various Fire Testing Agreements provided the City with inspection, testing and maintenance services of fire protection systems, as required.”*

Deputy Fire Chief reports to the Deputy City Manager

► February 9, 2018

“At this time, TFS has not advised the Auditor General's Office (AGO) of these findings, as the responsibility for the management of these Fire Testing Agreements and ensuring the receipt of good value for money thereunder resides within your jurisdiction. It is my recommendation that you notify the AGO of this potential wrongdoing and the associated steps taken under your contract management of the Fire Testing Agreements. Please advise if you would prefer that I notify the AGO.”

► AG not informed

Still Looking for Invoices, AG Asks to Meet With Managers to Request Help Locating Documentation and Understanding Process

- ▶ In preparation for the meeting, senior FM management on March 9, 2018 sent communication to managers who are to be interviewed:

*“We have been **very clear** with the auditors that Facilities Management follows the three way match process and our confirmation that the work has been done is based on the approval and release of the goods receipt.”*

Facilities Management's Independent Building Review

- ▶ Mid-March 2018: Facilities Management undertakes a review of 19 critical infrastructure buildings to verify compliance with Fire Code
- ▶ End of March/early April: FM received results that most of the 19 buildings were missing documentation and were not in compliance with the Fire Code
- ▶ April 20: received a letter from FM 'contextualizing' the work being undertaken by Facilities Management to verify compliance in its buildings.
 - no mention of inspection results of 19 critical buildings
 - 'potential wrongdoing' referral, requested by Deputy Fire Chief, not included in the letter

AG and Fire Chief not notified of results of inspections of critical buildings

During investigation wrap-up – Concerns about missing relevant information comes to light

- ▶ May 18, 2018 – AG was wrapping up the result of the work she contacted Toronto Fire Services for the results of their investigation into City buildings. AG learned:
 - TFS' difficulties finding inspection records
 - TFS' concerns and complaint about potential wrongdoing was not forwarded to the AG
- ▶ May 25, 2018 – AG receives details of the results on the 19 critical infrastructure buildings after making a request to Facilities Management

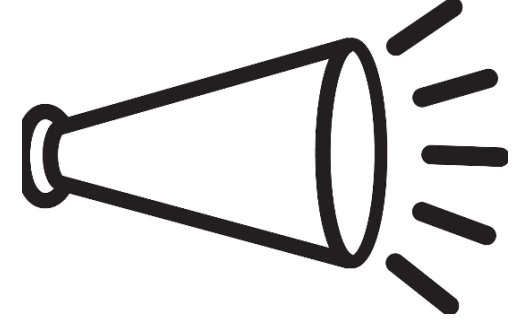
Information Not Provided to the AG by FM in a timely way or at all

Date	Information not provided by Facilities Management (FM)
May 2017	Facilities Management was notified by PMMD of complaint (Not provided)
June 2017	Additional information about complaint received by FM from PMMD (Not provided)
December 2017	Toronto Fire Services (TFS) notifies City Manager and DCMs that Advance Fire Control and York Fire have been issued Notice of Violations (Not provided)
January 2018	TFS sends email to FM advising they are having “significant challenges” in locating documentation (Not provided)
February 2018	FM received email from TFS informing about potential wrongdoing by third-party contractors (Not provided)
March 2018	FM did not provide detailed inspection results of 19 critical infrastructure buildings until May 2018 (Not provided until requested)

Line of Inquiry 3 – Know Your Vendor

1. Company searches
2. Send bid signatures out to a handwriting specialist
3. Summons the vendor to provide evidence under oath

AG Findings



A – Ontario Fire Code Inspection report **audit trail is missing**

Lack of proof to show inspections were done

Lack of understanding

B – **Problems with York Fire's Invoices** and Contracts

C – Concerns about the **Authenticity** of York Fire Protection

D – **Fire Chief's Investigation**

E - Broader **systemic issues**

How inspections are managed in City owned buildings

Opportunities to improve the industry

F - Clarifying **reporting of potential wrongdoing**

A. Lack of Proof to Show Inspections Were Done

The "lack of an audit trail as to whether essential safety work was carried out" was seen to be "a deep flaw".

-Building a Safer Future report

A. Lack of Proof, Lack of Understanding of Importance of Documentation

- ▶ Auditor General and external forensic accounting firm could only find full or partial documentation for 52% of sampled invoices
 - ▶ Missing documentation included:
 - Missing an entire inspection report
 - Incomplete reports (missing the fire alarm or flow test, for example)
 - ▶ Payment was processed despite these issues
 - ▶ Lack of compliance with the Fire Code

B. Problems With York Fire's Invoices and Contracts

“... the reports were inaccurate. Sometimes the reports had showed more emergency lighting than there was, sometimes it showed less. They just weren't accurate.”

-Facilities Management Manager

York Fire: Invoice Issues

- ▶ More batteries than required were replaced
- ▶ Potentially overbilled hours
- ▶ Service orders indicating technician was at 3 locations at the same time on the same day
- ▶ Duplicate charges
- ▶ Incorrect invoice dates
- ▶ Contract Release Orders or Divisional Purchase Orders issued after the date of service

Technician X in 3 Locations on Same Day, Same Time

Service Order	Invoice Number	Technician	City Location	Date	Time
#477681	#38897	Technician X	399 The West Mall	11-Dec-15	6:30am to 9:30am
#498985	#38899	Technician X	2700 Eglinton Avenue West	11-Dec-15	6:30am to 9:30am
#499025	#38670	Technician X	31 Glen Watford Drive	11-Dec-15	8:00am to 3:00pm

York Fire: Service Order Signatures Appear Electronically Manipulated or Duplicated

- ▶ Different Service Orders with exact same signatures
- ▶ Technician X said the signature “does not look like mine at all”

	
CUSTOMER'S SIGNATURE	CUSTOMER'S SIGNATURE
Max	Max
CUSTOMER NAME (PRINT)	CUSTOMER NAME (PRINT)
	
TECHNICIAN'S SIGNATURE	TECHNICIAN'S SIGNATURE
Technician X	Technician X
TECHNICIAN NAME (PRINT)	TECHNICIAN NAME (PRINT)

	
CUSTOMER'S SIGNATURE	CUSTOMER'S SIGNATURE
Leah	Leah
CUSTOMER NAME (PRINT)	CUSTOMER NAME (PRINT)
TECHNICIAN'S SIGNATURE	TECHNICIAN'S SIGNATURE
Technician X	Technician X
TECHNICIAN NAME (PRINT)	TECHNICIAN NAME (PRINT)
	

Customer Signatures Missing From Service Orders

BRIEF DESCRIPTION OF WORK COMPLETED :

FINDINGS : 1. Other

TECHNICIAN DESCRIPTION : [REDACTED] Completed annual E-Light inspection Replaced 2x 6/7 batteries. Fire fighters left for emergency before I could get a signature.

Toronto Fire Services said:

"...no trucks were dispatched ... I do not see any training listed where they would have been out of the hall."

Inconsistent invoices and Service Orders

Quotes from emails between the City and York Fire:

These are a mess to say the least. This is unacceptable. I have no time for sub-par work.

They are doing a terrible job.

I am not getting accurate reports no matter how much I try to hold their hand.

I have two invoices with the same invoice #, both in different amounts. Please send a credit in the amount of \$96.31

(We) ... are done with your excuses of "glitch", "typo" etc. We have tried but no more

City: Why is there no company logo on the invoices ...?

York: We are in the process of upgrading all of our internal data system, due to that you didn't get any LOGO's this time, But if you are still looking the ones with the LOGO as all the previous times, then please give me until the end of the day so I can re-submit to you.

Ontario Fire Marshal Guidelines

- ▶ OFM Guidelines include checking the performance record of a service company for:

*“...evidence of satisfactory work, quick response to service calls and **absence of repetitive problems**”*

- ▶ It is management's responsibility to ensure proper documents are retained.

Inconsistent Service Orders

767417

YFP

DATE
June 20th 2017

N° DE COTE
TAX REG. NO.

N° DE COMMANDE
ORDER NO.

VENDU A VOLD TO	<i>CoT</i>		
ADRESSE ADDRESS	<i>45 Disco Rd, Toronto (West Division)</i>		
EXPEDIER A SHIP TO	<i>330 Bering Ave</i>		
ADRESSE ADDRESS			

DATE D'EXPEDITION SHIPPING DATE	VIA	CONDITIONS TERMS	ACHETEUR BUYER	VENDU PAR SOLD BY

QUANTITE QUANTITY	DESCRIPTION	PRIX PRICE	MONTANT AMOUNT
1	<i>Personal Armed Emergency Lighting Inspection</i>		
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14	<i>Tech</i>	TPUSGT	
15	<i>R</i>	TWVYST	
16		TOTAL	

SIGNATURE

CRO# 8996948
 Yorkfine
 CR# 5-14456
 BROKEN PIPE
 15116 FIN
 672754
 DATE: May 6 2016
 NO OF TAXES: 0
 NO OF COMMODITIES: 1
 ORDER NO.:

VENDOR A
 SOLD TO
 ADDRESS
 ADDRESS
 EXPIRED A
 SHIP TO
 TORONTO WATER
 ADDRESS
 9 LESLIE ST
 DATE OF ESTIMATE
 SHIPPING DATE: VIA CARRIER TURN ACCT# BUYER
 TOTAL AMOUNT
 STONE

QUANTITY	DESCRIPTION	PRICE	AMOUNT
1			
2			
3	① Gained information on		
4	for quote for		
5	leaking pipe in		
6	Basement of Building		
7	13-16 (Firetrap Area)		
8			
9	② Leak is really Bad.		
10	Advised client to		
11	shut system down and		
12	conduct trip watch		
13	over weekend.		
14	*will return to complete		
15	2pm - 4pm		
16			
		TOTAL	

SALES ORDER

York Fire Protection
 Pbfax: 647-247-5779
 Pbfax: 647-504-6538
 Toll Free: 855-670-4310
 info@yfp.ca

Service Order
 # 0499522

Life Safety comes FIRST!

DATE: 5/26/2016 11:29:31 AM

TECHNICIAN: AC

Job Not Completed

TIME IN OUT

1) 10 11:30

am am

2)

3)

Regular Time

After Hour

Premium Time

No of Technician : 1

☐ Fire Alarms

☐ Sprinklers

☐ Emergency Lighting

☐ Hoists

☐ Fire Extinguishers

☐ Electrical

☐ CO Detector

☐ Monitoring

BILLING INFORMATION:

City of Toronto

148, Front St(South Division)

Toronto, ON

CONTACT INFORMATION:

Contact : Max

Phone :

Fax :

Email : workorder@yfp.ca

WITH ADDRESS :

City of Toronto

148, Front St(South Division)

Toronto

Contact : Max

Purchase Order # :

BRIEF DESCRIPTION OF WORK COMPLETED :

Findings : 1 Other

TECHNICIAN DESCRIPTION : 443 Bloor to E Completed annual E-Exit Inspection.

PARTS USED :

SERVICE ORDER TERMS

This customer, or their representative or their legal designee are at least 18 years of age, residing or visit the address as per the address above. I, warrant and warrant that the customer obtained the only valid the service provider for the Service Order Service as defined above contained by this agreement. I authorize this provider, agent, rep or inspector with all such access and equipment at the property listed above and I. Permit this service provider and its employees and or sub-contractors to access the property for that purpose as customer is the owner and property manager, and a member of the board of directors of the corporation and have the authority from the owner, an equivalent to permit such access and equipment. Customer or their legal designee or customer's authorized who accepts and signs for the work is considered authorized and agrees to pay to us all items along with information provided, charges the fees listed herein for by a person with pay this service order while the period specified, a case of any trouble on the property, customer is responsible in conducting a the work and will also obtain the local fire department office of any discrepancy occur. The fee tag book is placed by our technician if available. The book and is attached with any other belongings of the customer are returned if asked. Customer to signing this service order is satisfied with the technician's workmanship. The customer has read the terms and agrees to the fact that our technician is working the site in a safe condition when he arrived. Customer also accepts responsibility for any damage or damages suffered by the service provider as the fire authorization is not liability. All the work and material items, are issued on the day to be used or not be used at the time of the job. The customer and the agreement are required to the service and goods provided according to the service order. The customer may not, assign, transfer, service, change or otherwise dispose of the goods and transportation of the service is yours, more because the service is a single service, also anyone other than us (a sub-contractor) will have a claim against the service provider or services and equipment at the premises to anyone if customer is the owner of the property. Customer (prints any of the terms of this agreement) here is the entire permission by law. We say only the premises to be serviced and stop the service and terminate any agreement in place. Customer may not or what it could be to collect, store and the goods and services. If we call the goods, we will advise the site prior from the service customer use as. If this is related by us in the case of a problem to customer or their organization, then the customer is responsible to pay to the legal fees. In case customer calls another service provider to work on goods and services not supplied and or installed or repaired, the liability from our side will be nullified.

CUSTOMER'S SIGNATURE

Max

CUSTOMER NAME (PRINT)

AC

TECHNICIAN'S SIGNATURE

AC

TECHNICIAN NAME (PRINT)

767252

YORK
FIRE DEPARTMENT

MAY 4 2017

2015 LAWRENCE AVE W
TORONTO FIRE HALL 442

VEHICLE	DESCRIPTION	AMOUNT	DATE
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
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Annual E.
mption
08

Inconsistent Invoices

[illegible][illegible][illegible]

Staff Knew Inspection Reports Could Be Manipulated

Quotes from FM staff discussing the potential for inspection reports to be manipulated:

Manager 1: *“We get York reports – by email – not as an invoice attachment.”*

Manager 2: *“No signature? No time in time out? No comments? Excel and not PDF?”*

Manager 1: *“True – but it is better than no report 😊”*

Manager 2: *“Yes, but it can be totally manipulated.”*

Manager 1: *“Yes it can”*

Final Interview with Senior Management it was admitted:

- ▶ *"Where there's no service report, the supervisor who does the approval will not necessarily go looking for the service report. It was easier to just pass it through [to payment]"*

Supervisor Raised Concerns, but there was a lack of follow-up by management to verify that inspections were up to date

- ▶ Manager took Supervisor of Life Safety Systems' concerns “***with a grain of salt***” and that he could be “**persnickety**”
- ▶ After concerns raised, there was a lack of follow up on performance issues to ensure compliance with the Ontario Fire Code
 - Lack of follow-up on discrepancies
 - Lack of spot audits to verify work was done
- ▶ **June 2, 2017:** PMMD wrote to Senior Management at Facilities Management about possible health and safety risks and work not done related to this vendor
 - Management did not follow up

Lack of Management Action

Interview with AG:

AG: “So [the supervisor] is saying there are issues. You’re relying on [the supervisor’s] audit to make sure that you’re in compliance with the Fire Code.”

Manager: “Yeah.”

AG: “So [the supervisor] is saying ... he spent the time [to review the service provider’s work]... he says, “I have issues”. Then what do you do?”

Manager: “...we’ve known all along that there were issues [with York Fire]. We escalated it. There was a meeting with PMMD.”

The AG checked – **there was no meeting with PMMD.**

Lack of Verification to Confirm Work

AG: "... You paid (the invoices)? But these were in dispute at the time, were they not?"

Manager: "That's correct."

AG: "Did (you) go back and make sure that the work was done?"

Manager: "No."

AG: "... it's in dispute because...the work might not be done?"

Manager: "Or the reports were inaccurate. Sometimes the reports had showed more emergency lighting that there was, sometimes it showed less...they just weren't accurate."

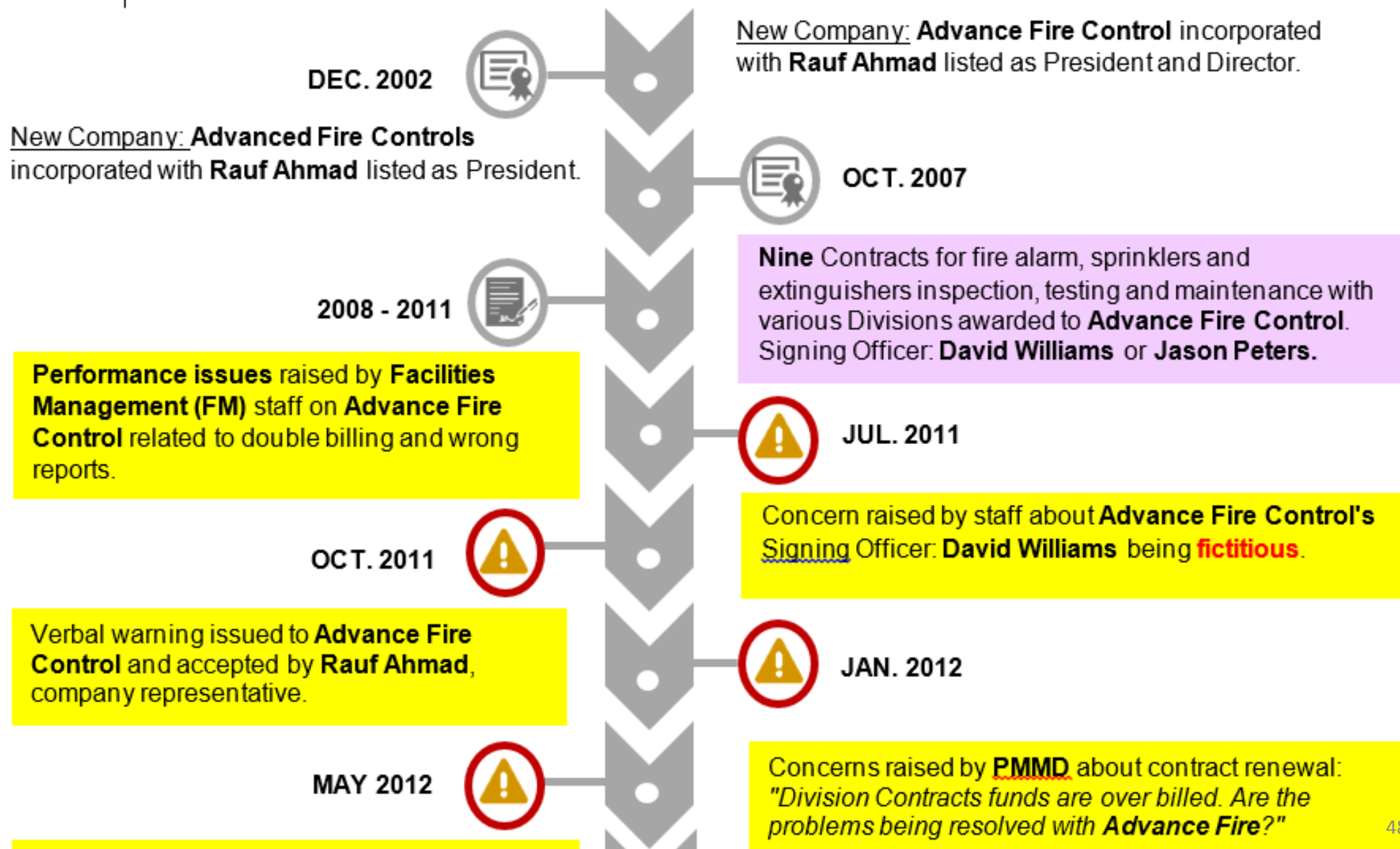
AG: "...So there is a possibility that the work wasn't done?"

Manager: "Yeah."

AG: "And (you) didn't go back to check that?"

Manager: "No."

TIMELINE: City's issues with companies



Rauf Ahmad filed claim against City of Toronto in relation to invoices not paid to Advance Fire Control¹ in Small Claims Court. The City defended saying the invoices:

- Are duplicates of invoices that have been paid;
- Were submitted without Service Reports, which are necessary as proof that services were performed;
- Were for work not requested and/or authorized to be performed under the contract;
- Were submitted with inaccurate Service Reports; or
- Were otherwise deficient or improperly invoiced and not in accordance with the Contract



JUN. 2013

NOV. 2013



Claim settled between City of Toronto and Advance Fire Control¹ after partial payment of disputed invoices by the City.



FEB. 2014

New company: Maf-Bar Conseil Ltee o/a York Fire Protection Ltd. incorporated. Aisha Lodhi listed as Director.

¹ Rauf Ahmad interchangeably used Advance Fire Control and Advanced Fire Controls during contracts with City of Toronto. Advanced Fire Control changed its name to AF Controls Canada. Rauf Ahmad on behalf of AF Controls Canada filed the claim against the City of Toronto.

AUG. 2014



Contract for fire alarm and sprinklers inspection, testing and maintenance awarded by Toronto Water Division to York Fire.

New company: Advanced Detection Technologies Corp. incorporated. Khalid Lodhi listed as Director. Rauf Arain is Signing Officer.

FEB. 2015



RFQ for fire safety services issued by Facilities Management

- Bid submitted by Advanced Detection Technologies. Signing Officer: Rauf Arain.
- Bid submitted by York Fire. Signing Officer: Dave Daniels. The Auditor General later notices similar handwriting on bid submissions.

MAY 2015



Rauf Ahmad, President, York Fire emails Toronto Water Division staff to resolve invoice issues.

JUL. 2015



York Fire awarded contract for Emergency Lighting inspection, testing and maintenance issued by Facilities Management Division.

JUL. 2015



Facilities Management Division supervisors escalate the issues of disputed invoices with York Fire to FM management.

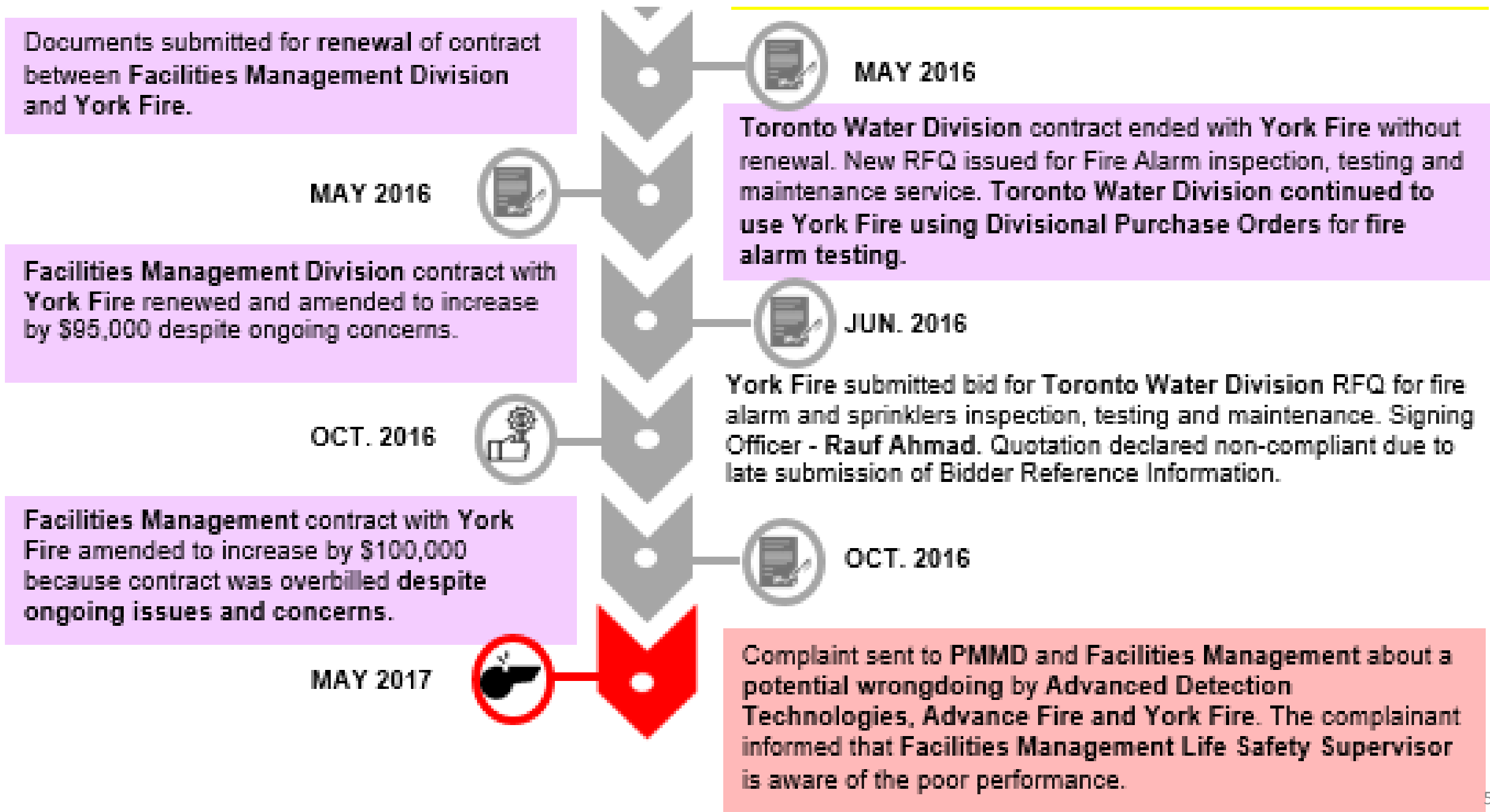
MAR. 2016



MAY 2016



Concerns about York Fire billing and performance flagged within Facilities Management but not raised to PMMD.



PMMD informed Facilities Management that "the information complainant is providing is and could be a health and safety risk to the City... annual inspections of the sprinklers, hydrostatic test, and flow, are not in fact completed." No action taken by Facilities Management.

JUN. 2017



Complaint against York Fire came in through Fraud and Waste Hotline. The Auditor General refers the complaint to Facilities Management and Toronto Fire Services for investigation. Fair Wage Office also initiates compliance review.

New Company: Ontario Fire Control incorporated with Fida Majid as Registrant.

JUL. 2017



York Fire Contract put on hold by Facilities Management Division while contract under investigation by the Auditor General. Disputed invoices held for payment.

Toronto Fire Services inspected various sites for safety risk and faced great difficulty in finding documentation.

NOV. 2017



Fair Wage Office issued letter of non-compliance with Fair Wage By-law to York Fire. Lack of transparency in record keeping noted.

Toronto Fire Services issued a Notice of Violation to Advanced Fire Control / York Fire alleging a number of violations contrary to the FPPA. Information provided to City Manager and DCM so that City Divisions are fully aware of relevant information in making purchasing decisions.

SEPT – DEC. 2017



DEC. 2017



Facilities Management received letter from Toronto Fire Services informing about potential wrongdoing by third

that City Divisions are fully aware of relevant information in making purchasing decisions.

FEB. 2018



Facilities Management continues to affirm to the Auditor General that the documentation is present and a three way match process is followed.

Facilities Management received letter from Toronto Fire Services informing about potential wrongdoing by third party contractors not performing their work properly when inspecting City properties. TFS recommended FM to inform the Auditor General. The Auditor General was not informed.

MAR. 2018



MAR. 2018



Facilities Management issued a Letter to the Auditor General "contextualizing" the compliance issues related to the maintenance of Fire & Life Safety Plans according to Ontario Fire Code requirements and mitigating actions. No information about potential wrongdoing provided.

Toronto Fire Services charged Advanced Detection Technologies Corp. for violations of the Ontario Fire Code. Charges are laid in Provincial Offences Court.

APR. 2018



MAY 2018



Bid awarded for fire alarm and sprinkler inspection, testing and maintenance to Advanced Detection Technologies Corp. on the recommendation of Facilities Management despite ongoing issues and concerns on other contracts and charges being laid under the Ontario Fire Code. PMMD asked FM to identify any historic performance issues relating to Advanced Detection and FM did not raise any. Contract award was halted after PMMD was informed by Legal Services.

Toronto Fire Services charged Advanced Detection Technologies Corp., Maf-Bar Conseil Ltee., York Fire Protection, Rauf Ahmad, Bushra Rauf and Dave Daniels for violations of the Ontario Fire Code. Charges are laid in Provincial Offences Court.

MAY 2018



Other Municipality Stopped Using York Fire

- ▶ *"There was a developing pattern of issues with business practices that staff had noticed and documented. There were also performance problems and failure to meet the terms outlined in the contract. Despite continued attempts to resolve the situation, it reached a point where action was required and all services with this company were stopped."*
- ▶ The contract was put on hold at that municipality. In addition, Ahmad confirmed to us that two more municipalities stopped working with his companies because of performance issues.

Contracts Continued to be Renewed

- ▶ **December 2017:** Deputy Fire Chief writes to City Manager and all Deputy City Managers explaining that York Fire Protection / Advanced Fire Control had been issued a Notice of Violation for apparent contraventions of the Ontario Fire Code and the original complaint was about Advanced Detection Technologies
- ▶ **February 2018:** Deputy Fire Chief wrote to Facilities Management that the vendor was not performing the work it was contracted to do
- ▶ **March 2018:** Advanced Detection Technologies charged under Fire Protection and Prevention Act
- ▶ **May 2018:** Advanced Detection Technologies was successful in bid for contract with Shelter, Support and Housing Administration. In wake of fire charges, contract was not sent to vendor.

C. Concerns About Authenticity of York Fire Protection

“A long time leader in life safety and property protection since 1993.”

- website, Advance Fire Control

“You can trust that your buildings’ life safety systems are being maintained by real professionals in the industry with care.”

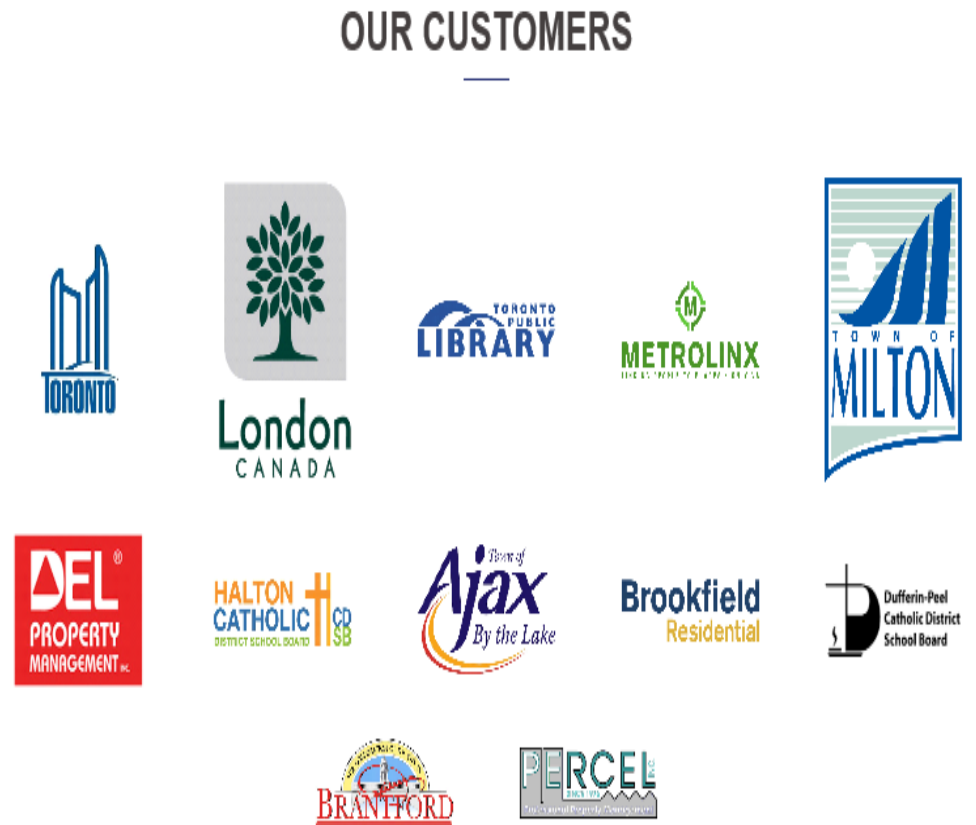
- website, York Fire Protection

York Fire & Advance Fire Control

York Fire

- ▶ *"YORK Fire Protection started servicing Fire Protection and Life Safety Systems in GTA Toronto, Hamilton, Niagara Falls, Cambridge, Kitchener-Waterloo, London, Barrie, Oshawa areas in 1989."*

Advance Fire website image



Life Safety Supervisor's Concerns

- Early on in contract with Advance Fire Control, billing issues arose, Life Safety Supervisor could not get in contact with David Williams. The supervisor emailed a City staff member:

*"I think when we call them in to discuss the contract we should insist that David Williams attends, he is the one that signed the contract, **I think he is fictitious**..."*

"Have you ever spoke to him, I have left voice mail for him and sent e-mail to his attention, but have not heard back or receive a reply."

Signing Officers Always Unavailable

- ▶ 2015: York Fire Protection won a contract
 - Life Safety Supervisor tried to have a kickoff meeting with Dave Daniels, who was similarly unavailable.
 - City staff never met a Dave Daniels or a David Williams.
- ▶ A colleague of the Life Safety Supervisor emailed:
*"So you finally met Dave Daniels... !!??
Or is he on his yacht sailing away into the sunset never to be seen again?"*

Various Signing Officers and Titles – Used for Convenience

Date	Name	Role	Company	Source
17-Feb-11	David Williams	Signing Officer and Operations Manager	Advance Fire Control	RFQ bid
06-Jun-13	Rauf Ahmad	Representative in Legal proceeding	Advance Fire Control / AF Controls Canada	Lawsuit
29-May-15	Rauf Arain	Signing Officer	Advanced Detection Technologies Corp.	RFQ bid
01-Jun-15	Dave Daniels	Signing Officer and Director	York Fire Protection	RFQ bid
11-Jun-15	Dave Daniels	Project Manager	York Fire Protection	Fair Wage Declaration
11-Jun-15	Rauf Arain	Signing Officer and Director	Advanced Detection Technologies Corp.	Fair Wage Declaration
31-Jul-15	Rauf Ahmad	President	York Fire Protection	Email to Toronto Water Division
21-Oct-15	Dave Daniels	Director Sales	York Fire Protection	Email to Facilities
18-Oct-16	Rauf Ahmad	Signing Officer	York Fire Protection	RFQ bid
15-Dec-16	Dave Daniels	President	York Fire Protection	Email to Facilities
22-Jun-17	Rauf	Technician	York Fire Protection	Packing Slip
05-Jul-17	Rauf Arain	Service Manager	York Fire Protection	Email to City Fair Wage Office
11-Jul-17	Rauf Arain	President	York Fire Protection	Email to City Fair Wage Office
11-Jul-17	Dave Daniels	President	York Fire Protection	Email to Facilities
14-Aug-17	David Daniels	Senior Fire Engineer	York Fire Protection	Website screenshot

Stock Photos, False Identities

York Fire website as at August 14, 2017:

OUR TEAM



David Daniels

David is a Senior Fire Engineer who has been Designing Fire Protection for 15 years. He has worked on complex Fire Systems in Ontario



Lacette Daniels

Lacette works as a Fire Safety Plan Corrdinator. She has got many plans approved in various Municipal Fire Offices around GTA Toronto



Steve Sailings

Steve is an outstanding Marketing Manager for our new clients.



Serena Crawford

Serena is assisting Omar in marketing Department, making clients meetings, and schedules. She also

Other websites with the same images and similar names as at August 14, 2017:

ATTORNEYS



David Williams

David is a bankruptcy attorney who has been practicing for 15 year. He has served as Judge Pro Tem in Federal and Superior courts in Arizona.



Lacette McDaniel

Lacette practices Family and Probate Law. Lacette is highly skilled at resolving domestic issues quick and fairly.



James Dumont

James served 10 years as an organized crime prosecutor. In private practice he has broadened his work to all areas of criminal law.



Serena Crawford

Serena primarily focuses on civil matters, with an emphasis in corporate disputes. She is very effective at reaching settlements, but also has an excellent trial record.

OUR CONSULTANTS



David Williams

David is an Operations consultant who has been practicing for 15 years. He has served as advertising consultant for leading agencies in Asia.



Lacette McDaniel

Lacette is a Sales specialists with over 20 years in Banking industry. Christina is highly skilled at identifying domestic & International sales opportunities issues quickly and fairly.



James Dumont

James served 10 years as an organized Lean Management consultant. His area of expertise is in maximizing areas of opportunities.



Serena Crawford

Serena primarily focuses on business start up. Understanding business areas & competitors. Her specialism is in Political, Economical, Sociological, Technological factors for International businesses.



Louis A Betchem

Louis is a strategy thinker with experience leading business and business strategy in Europe and north America.



Lacette McDaniel

Lacette practices Family and Probate Law. Lacette is highly skilled at resolving domestic issues quickly and fairly.



James Dumont

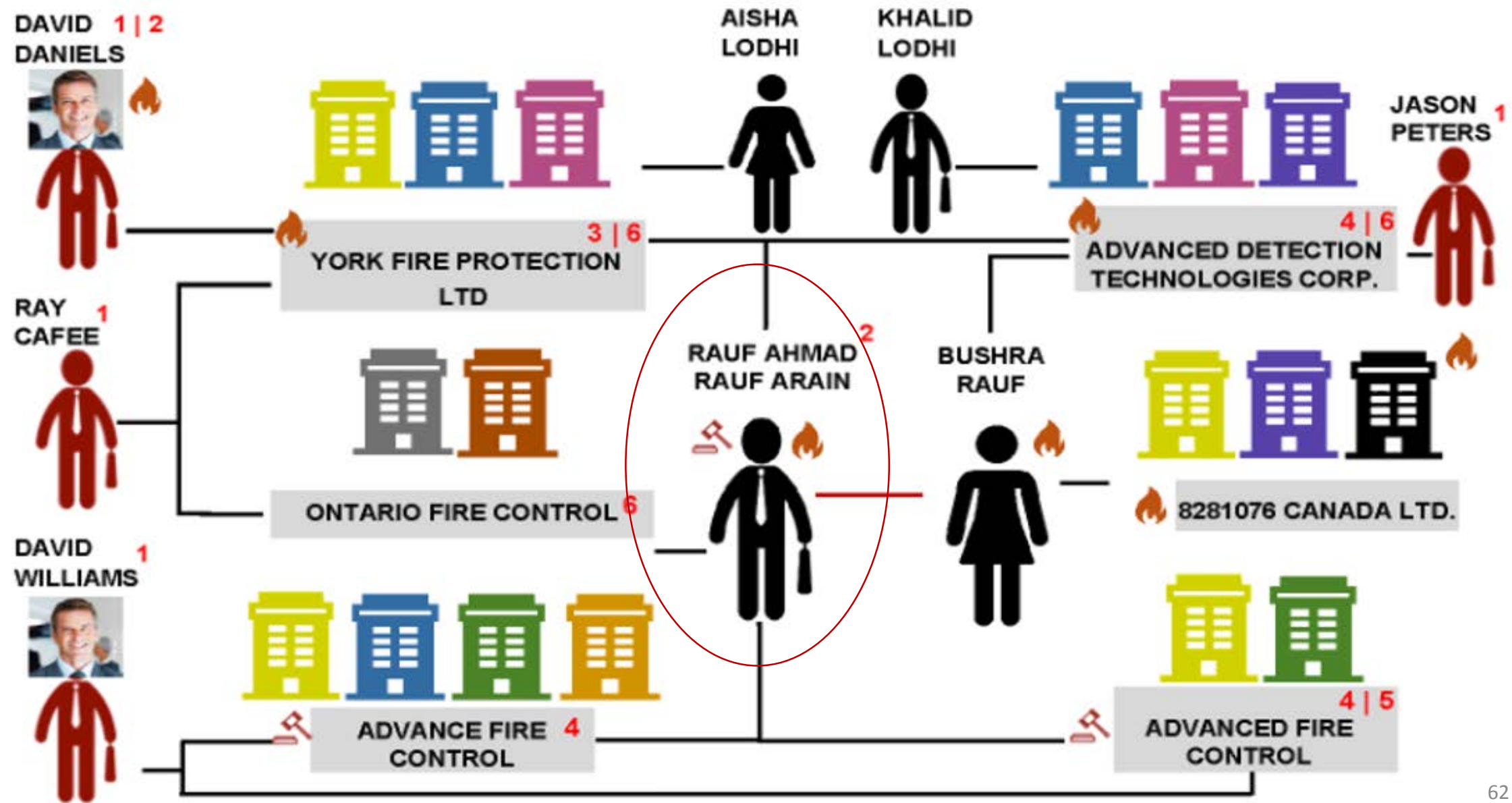
James served 10 years as a senior financial adviser. In private practice he has broadened his work to all areas of finance.



Serena Crawford

Serena primarily focuses on civil matters, with an emphasis in corporate disputes

Morphing Companies and Names



Explanation – Relationship Map

LISTED ADDRESSES BY COLOUR, LEGENDS AND FOOTNOTES



26 MANORWOOD RD., TORONTO, ON (Residential property)



43-2721 MARKHAM RD., SCARBOROUGH, ON (Commercial property)



102A-1510 BIRCHMOUNT RD., TORONTO, ON (Commercial property)



39 CITADEL DR., SCARBOROUGH, ON (Residential property)



2575 DANFORTH AVE., TORONTO, ON (Mixed use property)



1303 AVE-Y NORTH, SASKATOON, SK (Residential property)



6 – 1193A BRIMLEY RD., SCARBOROUGH, ON (Commercial property)



2560 LAWRENCE AVE. EAST, TORONTO, ON (Mixed use property)



1100 BIRCHMOUNT RD., SCARBOROUGH, ON (Jamia Talimul Islam listed as registered office)



Filed lawsuit against City of Toronto in 2013.

Confirmed as ex-spouse.



Charged with Ontario Fire Code Violations in 2018.

- 1 Person is Signing Officer on City contracts and are confirmed to be **fictitious**. Ahmad confirmed that these are AKA names. Details of roles and positions in Table 2. Ray Gafee is believed to be **fictitious**.
- 2 The affiliation and roles of these individuals to York Fire Protection are outlined in Table 2.
- 3 Maf-Bar Conseil Ltee. is the incorporated company that operates as York Fire Protection.
- 4 Rauf Ahmad interchangeably used Advance Fire Control and Advanced Fire Controls during contracts with City of Toronto. Ahmad confirmed that these are operating trade names for Advanced Detection Technologies.
- 5 Advanced Fire Control later changed its official name to AF Controls Canada. The claim filed by Rauf Ahmad against City of Toronto was on behalf of AF Controls Canada.
- 6 Ahmad confirmed that York Fire Protection and Advanced Detection Technologies are merging into Ontario Fire Control.

Handwriting Analysis

A black ink signature on a document. The signature is written over a line that reads "Officer Ahmad/Arain". The signature is stylized with a large, circular loop at the beginning.

**Signature 1 (Q1) – Rauf Ahmad/Arain,
Advanced Detection Technologies Corp.**

A black ink signature on a document. The signature is written over a line that reads "Signing Officer for Company". The signature is stylized with a large, circular loop at the beginning.

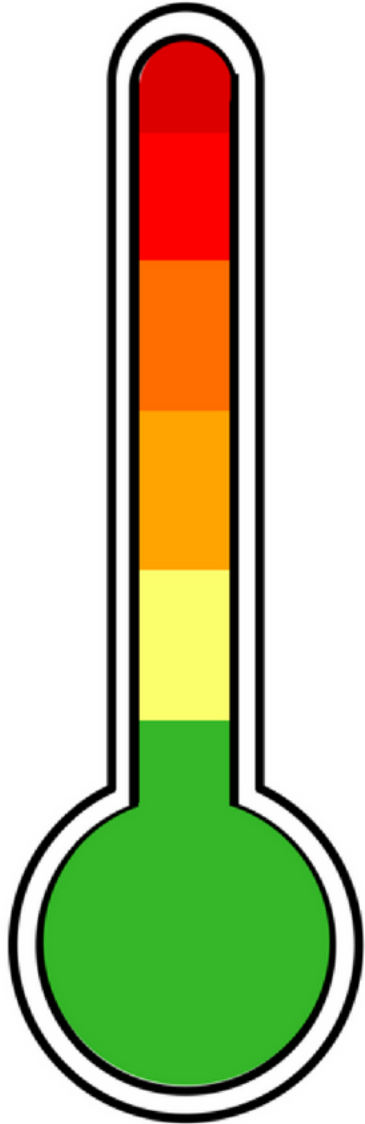
**Signature 2 (Q2) – Dave Daniels, York Fire
Protection**

A signature on a document, rendered with a multi-colored, rainbow-like effect. The signature is written over a line that reads "Person X". The signature is stylized with a large, circular loop at the beginning.

**Signature 3 (Q3) – Person X, Advanced
Detection Technologies Corp.**

- ▶ Auditor General noticed similar handwriting on various bids
- ▶ Expert: “*the evidence supports my opinion to a reasonable degree of scientific certainty that the signatures and handwriting on the three Requests for Quotation from the City of Toronto labeled 'Q1' through 'Q3' were written by one hand/same hand...*”

Fraud Warning Signs



- ✓ Staff raise concerns about vendor
- ✓ Duplicate, incorrect, and excessive errors on vendor's invoices
- ✓ Multiple companies with same address and/or owners
- ✓ Difficulty in contacting vendor or in getting clear answers
- ✓ Poor performance
- ✓ Invoiced goods or services cannot be verified
- ✓ Vendor consistently submits lowest bid
- ✓ Constant over-commitment in contracts
- ✓ Frequent changes in vendor contacts/staff designations and difficulty contacting key officials
- ✓ Vendor awarded contract without history or background check done
- ✓ Negative feedback from staff about vendor
- ✓ Forged signatures

Risk of Fraud, Difficult to Prove

- ▶ Fraud is unproven because of the difficulties amassing the records and a lack of consistency in management's statements regarding the procedures they followed when paying invoices.
- ▶ However, based on the totality of the evidence, it is our view that there is a high-risk situation for fraud.

D. Fire Chief's Investigation

“It really is a breach of trust. These fire prevention systems are in buildings to protect the public and responding firefighters and for these companies to allegedly have gone in and not inspected and maintained those systems causes us great concern.”

-Deputy Chief Jessop, Toronto Fire Services

Time Constraints with the Fire Prevention and Protection Act (FPPA)

- ▶ Auditor General asked Toronto Fire Services to investigate
 - **May 2018:** 90 charges laid against Advanced Detection Technologies, York Fire Protection, Rauf Ahmad, and several others
- ▶ Time constraints of the Fire Prevention and Protection Act (FPPA):
 - Toronto Fire Services only allows 6 months from when a violation is allegedly committed to investigate and lay charges
 - FPPA is silent on the limitation period and discoverability language, so the law defaults to the Provincial Offences Act's 6-month time limit
 - By contrast, Ontario Building Code allows for 1 year from the time when the alleged violation becomes known
- ▶ TFS has requested legislative change to bring the FPPA in line with the Ontario Building Code

E. Systemic Issues

City Building Inspection Results

- ▶ York Fire not the only company hired by the City to do life safety inspection work
- ▶ Auditor General requested Toronto Fire Services to inspect 12 buildings, including City Hall, Metro Hall and Union Station
 - All but 1 found to have Fire Code deficiencies

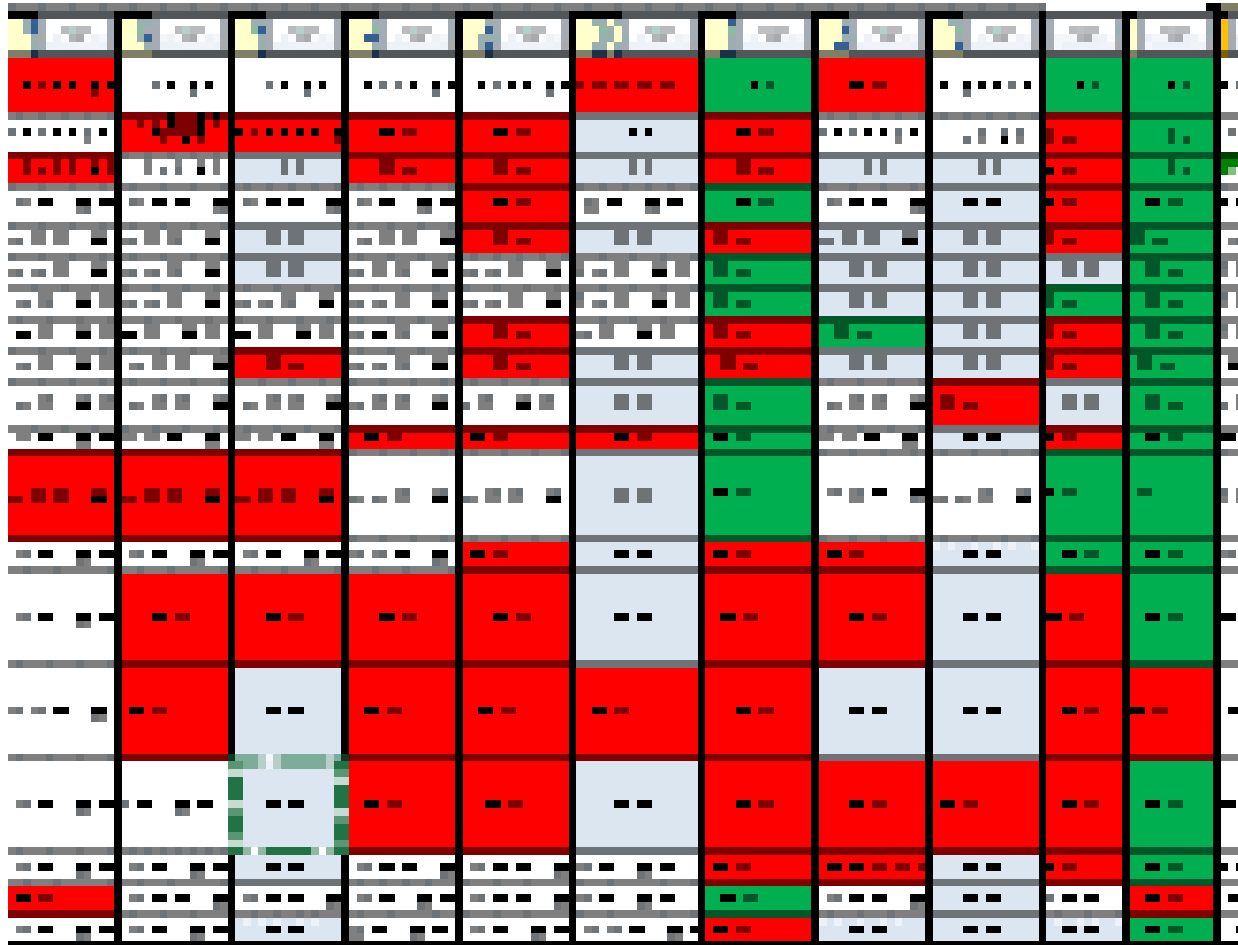
Sample of TFS Inspection Results – Building A

Service	Inspection	Results (TFS)
Company 1	2016 Fire Extinguisher and Fire Hose Inspection	- The five (5) and six (6) year internal maintenance inspections for the fire extinguishers have not been recorded (NFPA 10, 7.3.1.1).
Company 3	2017 Fire Alarm and Life Safety System Inspection Certificate	- CFAA Technician No. not provided and is not signed . - Various information (i.e., monitoring company, etc.) is missing and / or not properly filled out .
Company 3	2017 Sprinkler Inspection Certificate	Various information within the fire pump testing records (Page 35) is missing and / or not properly filled out . It appears that the fire pumps have not been tested based on the lack of information provided.
Company 9	2016 – Kitchen Extinguishing System	Only the certificate of inspection has been provided. No inspection / test reports have been provided for review.

Sample of TFS Inspection Results – Building B

Service Company	Inspection	Results (TFS)
Company 10	2016 CAN/ULC-S536-04 Annual Fire Alarm System Inspection Certificate / Test and Inspection Report	<ul style="list-style-type: none"> • The CAN/ULC-S536-04 Annual Fire Alarm System Inspection Certificate and Report reference the wrong edition of the standard. • Several items on the report have not been completed. Where not applicable, N/A must be checked. • Smoke detector sensitivity tests not completed. • A deficiency report was not provided.
Company 10	2016 Fire Extinguisher A	<ul style="list-style-type: none"> • Inspections and tests were conducted in accordance with was not provided. • A deficiency report was not provided.
Company 10	2016 Sprinkler Inspection	<ul style="list-style-type: none"> • An inspection certificate/cover letter indicating which standard the inspections and tests were conducted in accordance with was not provided. • Report identifies that changes or additions to the systems have been made. No details provided. • Main drain test not completed. • Standpipe flow test not completed. • Fire pump flow test not completed. • Dry pipe sprinkler systems trip test method not identified. • Standpipe hose inspection and test report not provided (part of checklist)
Company 10	2016 Deficiency Repairs	<ul style="list-style-type: none"> • Includes corrective measures/repairs to address deficiencies noted on the 2016 Annual Inspection Reports as well as other repairs and installations. • Verification reports were not provided for repairs/installations such as the fire alarm system for a tent venue (Invoice 15654). • Certificates/clearance letters confirming that deficiencies noted on each report were corrected/repaired were not provided.
Company 11	2015-2016 Generator and Diesel Fire Pump Monthly and Semi-Annual ITM Reports	<ul style="list-style-type: none"> • Fire pump records do not include flow test information, only engine maintenance. • Generator annual and quinquennial test and inspection reports were not provided as required by C282-09. • Deficiency reports were not provided. • A certificate/clearance letter confirming that deficiencies noted were corrected/repaired was not provided.

Facilities Management's Inspection Report



The image shows a large grid representing an inspection report. The grid is composed of many small cells, each containing a small icon or symbol. The cells are color-coded: red, green, and grey. The red cells are scattered throughout the grid, while the green cells are concentrated in the rightmost columns. The grey cells fill the remaining space. The grid is organized into several vertical columns, with the rightmost column being entirely green. The overall pattern suggests a systematic inspection of various facilities, with red indicating areas needing attention and green indicating compliance.

Findings do not mean that buildings are necessarily unsafe but there is some work that needs to be done to bring buildings into compliance.

Systemic Issues

1. Not treating inspection of life safety systems in **a building as one whole system**
2. Using a **decentralized** and **siloed** model to manage life safety inspection services
3. **Not standardizing inspection sheets** to ensure consistency
4. Not using a **centralized database**
5. Not having a **centralized complaints process** that can capture concerns about a particular contractor
6. Not clarifying **roles and responsibilities** of staff, contractors and building owners

As Many as 6 Companies Inspecting Parts of 1 Building at Same Time

COMPANY A
Emergency Lighting



COMPANY B
Fire Extinguishers



COMPANY C
Sprinkler Systems



COMPANY D
Fire Alarms



COMPANY E
Emergency Power



COMPANY F
Emergency Generators



Companies Have Extensive Access To City Buildings



- ▶ Service providers not monitored while they do their work. Not practical to monitor all of them, but highlights importance of due diligence and security checks before hiring
- ▶ Past performance not verified
 - Ex. York Fire was formed in late 2013, but website said it had been in operation since 1989

Need to Trust Vendor Does Not Override Need for Due Diligence

EXPERIENCE YOU CAN TRUST

York Fire Protection offers a total solution to any small or large scale facility's fire safety issues. Our staff understand how inconvenient and expensive a buildings' life safety system can be and that is why we are dedicated to providing exceptional service that is built around your schedule at an affordable price. York Fire Protection is a 24 hour, 365 days a year Inspection Maintenance and Service company. Our goal is to make your buildings' as simple to maintain as possible. You can trust that your buildings' life safety systems are being maintained by real professionals in the industry with care.



- ▶ Disreputable companies can present fire hazards, security risks and legal liabilities
- ▶ Depending on the building, it would be appropriate to:
 - Obtain background checks on contractors
 - Ensure contractors identify themselves with valid ID at sites before inspection

Potential Performance Issues - Other Vendors

One example:

- ▶ Company X, billed for inspecting 4 sprinkler systems in a building that did not even have sprinkler systems
- ▶ Life Safety Supervisor again raised concerns to manager that Company X was not performing work required in the contract and under the Ontario Fire Code
 - Toronto Fire Services confirmed to Auditor General that some testing had not been completed by Company X
- ▶ PMMD asked Facilities Management if there were issues with Company X, Facilities Management managers did not identify any issues even though the manager had been told by the Life Safety Supervisor
- ▶ PMMD renewed a multi-year, multi-million dollar contract with Company X

Poorly Worded RFQs

- ▶ Fire Inspectors and Toronto Fire Services noted that City staff did not have an understanding of the daily, weekly, monthly and annual inspection, test and maintenance criteria
- ▶ Some RFQs had conflicting information on inspection expectations
“The scope of work identified throughout the document is not consistent and as a result provides an opportunity for bidders to misinterpret and/or not include for certain services. It is also important to ensure that the codes and standards being referenced to in the RFQ documents are accurate including the applicable editions as referenced in the OFC.”
- Fire Inspector

Awarding Contracts Based on Lowest Bid

- ▶ Complainant said Ahmad would submit lowest bids in order to get a contract
- ▶ Facilities Management RFQ and Toronto Water said award of contract will be based on:
"Bidder meeting the specifications and providing the lowest grand total cost..."
- ▶ Cost is important, but should not be the primary criteria for life safety inspection services
 - Past performance should be considered, but was not

F. Potential Wrongdoing

*"It is my recommendation that **you notify the AGO of this potential wrongdoing** and the associated steps taken under your contract management of the Fire Testing Agreements. **Please advise if you would prefer that I notify the AGO.**"*

-Deputy Fire Chief to the Deputy City Manager, Internal Corporate Services and cc'd Deputy City Manager, Cluster B

Auditor General Not Notified About Potential Wrongdoing

- ▶ **February 6, 2018:** Deputy Fire Chief informs Facilities Management

"It does not appear to the TFS staff that the third parties retained under the various Fire Testing Agreements provided the City with Inspection, testing and maintenance services of the fire protection systems, as required."

- ▶ **February 9, 2018:** Deputy Fire Chief brought potential wrongdoing complaint to Deputy City Manager and Deputy City Manager - Internal Corporate Services, recommending Auditor General be contacted

➤ *"It is my recommendation that **you notify the AGO of this potential wrongdoing** and the associated steps taken under your contract management of the Fire Testing Agreements. **Please advise if you would prefer that I notify the AGO.**"*

- ▶ **Auditor General was not notified**

Definition of Wrongdoing

► Toronto Public Service By-law:

"Serious actions that are contrary to the public interest including but not limited to:

(1) Fraud;

(2) Theft of City assets;

(3) Waste: mismanagement of City resources or assets in a willful, intentional or negligent manner that contravenes a City policy or direction by Council;

(4) Violations of the City's Conflict of Interest rules set out in Article IV; and

(5) Breach of public trust."

Recommendations (17 – Summarized Below)

1. Bring all City owned buildings into compliance with Fire Code
2. Clarify roles and responsibilities and increase training for staff
3. Develop protocols to conduct due diligence
 - Ensure appropriate qualifications
 - Update contracts with proper code specifications
4. Change FM approach to managing life safety systems in buildings
 - Treat a building as a holistic system
 - Centralize the oversight of all City buildings – including a centralized database of forms and status, accessible by the Fire Chief if need be – and notifications if a vendor is not performing well
 - Standardize inspections (and ensure forms comply with the Fire Code)
5. TFS to work with the Ontario Fire Marshall to support issues arising in the report, including:
 - Having a watch list for companies and tracking of where work is completed
 - Making recommendations to increase the time to complete investigations
 - Increasing regulation, training and licencing for all life safety system components to allow for 'delicencing' if necessary
 - Designing a quality control program
 - Striking a technical advisory committee on system-wide issues and making recommendations to the Deputy Minister
6. Staff to report all concerns about potential wrongdoing to the Auditor General

Changing the culture

- In the summer of 2017, the U.K. government commissioned a report entitled, "Building a Safer Future: Independent Review of Building Regulations and Fire Safety – Final Report" that reviewed building regulations and fire safety measures following the Grenfell fire. Besides recognizing the impact of **not having an audit trail of inspections as a key issue**, the Report highlighted three cultural issues that contributed to the disaster:
 - **ignorance,**
 - **indifference** and
 - **a lack of clear roles and responsibilities.**
- These themes resonated with us during the investigation.
- The technical situation **here in Ontario is very different**, according to Fire Chief Matthew Pegg.

"Here in Ontario we are fortunate to have the comprehensive fire protection and fire safety measures that are contained in the Ontario Building Code.⁸⁵"

In closing

- ▶ The Building Code and Fire Code are not enough to prevent or lessen the impact of fires.

"Fire safety is always very much a team effort,
it is very much a partnership (with owners)."

-Chief Pegg

- ▶ We must do our share.

End of presentation