



AFFLECK GREENE MCMURTRY LLP
BARRISTERS

EA3.1.2

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June 26, 2019

File: 4241-001

By Email: complianceaudit@toronto.ca

Compliance Audit Committee, City of Toronto
10th floor, West Tower, City Hall
100 Queen St W
Toronto ON M5H 2N2

Attention: Ms. Julie Amoroso

Dear Ms Amoroso:

**Re: Jim Karygiannis re Compliance Audit for 2018 Municipal Election
Compliance Audit Committee EA3.1**

We are the lawyers for Jim Karygiannis, who is the respondent in the above-captioned request for the appointment of a compliance audit.

We request an adjournment of the hearing scheduled for July 2nd. The Applicant has had over two months in which to prepare and deliver materials whereas our client has been given three weeks. Given the allegations being made by the Applicant, fairness in the process would dictate that our client be afforded more time in which to respond.

It is our intention to put forward evidence to the Committee that there are no reasonable grounds upon which to order a compliance audit. An adjournment is required because the Committee must weigh whether there is both compelling and credible information to satisfy the reasonable grounds test. We respectfully submit that the inferences for which the Applicant is asking the Committee to draw are not supported by any compelling or credible information.

Counsel for the Applicant has agreed to our initial request to have the matter heard at the end of July. Moreover, the original date was moved to accommodate counsel for the applicant and our availability.



On behalf of our client, we acknowledge and undertake that we waive any right to raise any issue respecting the timeliness of the meeting date and or decision of the Committee, in particular a waiver of any right to raise compliance with s. 88.33(7) of the *Municipal Elections Act, 1996*, in the event that for any reason whatsoever the Committee is unable to consider or decide the application within 30 days.

We trust this is satisfactory.

Sincerely,

Affleck Greene McMurtry LLP

A handwritten signature in blue ink, appearing to read 'Binetti', written over the printed name of Michael I. Binetti.

Michael I. Binetti

cc: Mr. Stephen Aylward, Stockwoods LLP (Email: stephena@stockwoods.ca)