



Executive Summary of Legal Review of Complaint Relating to Toronto Parking Authority (“TPA”) Parking Access and Revenue Control System Request for Proposals Process (“PARCS RFP”)

This document summarizes the findings of Blake, Cassels, & Graydon LLP (“**Blakes**”) resulting from its independent investigation into a complaint received by the Toronto Parking Authority (“**TPA**”) from a proponent in the PARCS RFP (the “**RFP**”).

1.0 The Complaint

On July 21, 2025, while the RFP was ongoing, a proponent sent the TPA a complaint letter alleging that the TPA had breached applicable procurement policies by engaging “in covert recruitment and onboarding” of one of the proponent’s senior executives during a “blackout” period when the proponent’s response to the RFP was under consideration. The individual was hired by the TPA on or about May 28, 2025, following a recruitment process at the TPA.

On July 24, 2025, the proponent sent a second letter to the TPA which stated that by July 11, 2025 “the internal decisions had been made” about the outcome of the RFP, suggesting that the proponent may have known the confidential ranking of the PARCS RFP proponents before that information was public.

2.0 Blakes’ Investigation

Further to Council’s direction as set out in [MM 32.50](#), on August 25, 2025 the City of Toronto (the “**City**”), through its legal department, retained Blakes to:

- (i) identify and review the factual circumstances surrounding the individual’s recruitment by the TPA, and whether there is any evidence to suggest that this recruitment process had any impact on the RFP process (“**Mandate 1**”);
- (ii) determine whether there is any evidence that the proponent improperly knew how proponents ranked in the RFP before that information was made public and, if so, whether there is evidence that this information was improperly disclosed by the TPA or others involved in the RFP (“**Mandate 2**”); and
- (iii) review compliance with applicable laws and policies, as referenced in MM 32.50, in relation to the Complaint Letter (“**Mandate 3**”).

3.0 Methodology

Blakes’ investigation methodology was informed by the International Bar Association’s “Global Best Practices for Conducting Internal Investigations” dated July 2021 as well as by generally accepted best practices for investigations.

The City facilitated Blakes' access to individuals at the TPA who were identified through the investigation process as possessing knowledge potentially relevant to the investigation, regardless of their level of seniority or position.

Blakes, in consultation with the City's legal department, collected relevant employee emails during the period when the RFP and the hiring process for the individual were undertaken at the TPA. Blakes collected additional relevant documents directly from TPA and City personnel. Blakes applied search terms to these documents to create targeted review sets, as well as applied machine learning to identify potentially relevant documents. Blakes ultimately processed approximately 50,000 documents and engaged in a targeted review of approximately 2,000 documents that were identified as having direct relevance to the matters under investigation.

Blakes also conducted interviews of eight individuals between August 27 and September 25, 2025. Interviews lasted between 30 minutes and 1.5 hours. All interviewees were found to be cooperative and forthright. No credibility concerns were observed. No interviews were conducted with the individual or any representative of the proponent. Although it is possible they might have independent information, no information received throughout the investigation indicated this was likely to be the case, or that such interviews were likely to impact Blakes' findings.

4.0 Summary of Investigation Findings

At the conclusion of the investigation, Blakes factual findings are as follows.¹

Mandate #1: Blakes found no evidence to suggest that the TPA recruitment process involving the individual had any impact on the RFP process. Although the two processes occurred temporally at the same time, there was no evidence of overlap or information sharing between the two processes. Each was managed by different internal teams that were siloed from each other at the TPA, administered by external third parties, and governed by strict confidentiality protocols.

Mandate #2: Blakes found no evidence to suggest that the proponent obtained confidential information from TPA personnel regarding its ranking following the evaluation process, including the ranking of any other proponent. While inconclusive, it appears that the proponent's statements regarding its position following the evaluation process as set out in its July 24, 2025 letter were speculative on its part.

Mandate #3: Blakes did not identify any breaches of applicable laws and policies as referenced in MM 32.50 on the part of the TPA.

¹ Subject to the investigation parameters and scope exclusions. Blakes was not engaged to investigate or comment on the legality of the broader RFP procurement process, which was administered by the Procurement Advisory Office ("PAO"), a third-party consulting firm.