

Court File No. CV-21-00077187-0000

ONTARIO SUPERIOR COURT OF JUSTICE

B E T W E E N:

**KRISTEN HEEGSMA, DARRIN MARCHAND, GORD SMYTH, MARIO MUSCATO,
SHAWN ARNOLD, CASSANDRA JORDAN, JULIA LAUZON, AMMY LEWIS,
ASHLEY MACDONALD, COREY MONAHAN, MISTY MARSHALL,
SHERRI OGDEN, JAHMAL PIERRE, and LINSLEY GREAVES**

Applicants

-and-

CITY OF HAMILTON

Respondent

APPLICANTS' APPLICATION RECORD

VOLUME 16 – TABS 125-135

HĀKI CHAMBERS

319 Sunnyside Avenue
Toronto, ON M6R 2R3
Sujit Choudhry (LSO# 45011E)
Tel: 416-436-3679
sujit.choudhry@hakichambers.com

COMMUNITY LEGAL CLINIC OF YORK REGION

21 Dunlop Street
Richmond Hill, ON L4C 2M6

Sharon Crowe (LSO# 47108R)
Tel: 905-508-5018 ext. 57
sharon.crowe@yr.clcj.ca

Michelle Sutherland (LSO# 70159T)
michelle.sutherland@yr.clcj.ca

Curtis Sell (LSO # 84128A)
curtis.sell@yr.clcj.ca

ROSS & MCBRIDE LLP

1 King Street West, 10th Floor
Hamilton, ON L8P 1A4
Wade Poziomka (LSO# 59696T)
Tel: 905-572-5824
wpoziomka@rossmcbride.com

Counsel to the Applicants

TO:

GOWLING WLG (CANADA) LLP

Barristers & Solicitors

1 King Street W, Suite 1500
Hamilton ON L8P 1A4

Bevin Shores (LSO#56161F)

Tel: 905-540-2468

bevin.shores@gowlingwlg.com

Jordan Diacur (LSO#65860E)

Tel: 905-540-2500

jordan.diacur@gowlingwlg.com

Counsel to the Respondent

VOLUME 16 INDEX – HEEGSMA ET AL. v. CITY OF HAMILTON

TAB (EXHIBIT LETTER)	Document
APPLICATION RECORD VOLUME 16	
WESLEY LOY	
125.	Supplemental Affidavit of Wesley Loy dated July 25, 2024
a.	Exhibit A – Chart re: location criteria for identification (P 6/43)
b.	Exhibit B – Charts re: dispatches to encampments by number and percentage (P 8/43)
c.	Exhibit C – list of details of each dispatch call (P 10/43)
d.	Exhibit D – HPS Dispatches by month Jan 2023- June 2024 (P 36/43)
e.	Exhibit E - Chart re: percentage of dispatches to encampments Jan 1, 2023- June 30, 2024 (P 38/43)
f.	Exhibit F - Charts re: primary problems in encampments Jan 1, 2023 – June 30, 2024 (P 41/43)
126.	Transcript of the Cross Examination of Wesley Loy dated August 16, 2024
CORY MANNING	
127.	Affidavit of Cory Manning dated July 30, 2024
a.	Exhibit A – Summary of Daily Cleanup at Encampments from Feb 2023 to Feb 2024 (P 6/51)
b.	Exhibit B – Summary of Daily Cleanup at Encampments from Mar 2024 to first week of Jul 2024 (P 20/51)
128.	Transcript of the Cross Examination of Cory Manning dated Aug 27, 2024
ROBERTO MASTROIANNI	
129.	Affidavit of Rob Mastroianni dated October 6, 2021
130.	Supplementary Affidavit of Roberto Mastroianni dated October 12, 2021
a.	Exhibit A – Chart summarizing the shelter occupancy rates from January 2021 and September 2021 (P 10/13)
131.	Transcript of the Cross Examination of Roberto Mastroianni dated October 13, 2021
132.	Third Supplementary Affidavit of Roberto Mastroianni dated July 31, 2024
a.	Exhibit A - Table setting out the total number of City-funded shelter beds, organized by month from January 2020 to June 2024 (P 15/18)
133.	Transcript of the Cross Examination of Roberto Mastroianni dated August 28, 2024
FRANK MISCIONE	
134.	Supplemental Affidavit of Frank Miscione, Hamilton Police Service dated July 24, 2024
a.	Exhibit A – HPS Encampment Calls for Service and Encampment Engagement Team Overview July 22, 2024 (P 4/17)
b.	Exhibit B – HPS Encampment Calls for Service and Encampment Engagement Team Overview Appendix A July 22, 2024 (P 15/17)
135.	Transcript of the Cross Examination of Frank Miscione dated August 22, 2024

A8630

Court File No. CV-21-00077187-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

KRISTEN HEEGSMA, DARRIN MARCHAND, GORD SMYTH, MARIO
MUSCATO, SHAWN ARNOLD, BRADLEY CALDWELL, CHRISTINE
DELOREY, GLEN GNATUK, TAYLOR GOGO-HORNER, CASSANDRA
JORDAN, JULIA LAUZON, AMMY LEWIS, ASHLEY MACDONALD,
COREY MONAHAN, MISTY MARSHALL, SHERRI OGDEN, JAHMAL
PIERRE, LINSLEY GREAVES and PATRICK WARD

Applicants

and

CITY OF HAMILTON

Respondent

APPLICATION UNDER 14.05 OF THE *RULES OF CIVIL PROCEDURE*

AFFIDAVIT OF WESLEY LOY

I, Wesley Loy, of the City of Hamilton, in the Province of Ontario, AFFIRM:

1. I am a data and records coordinator employed by the Hamilton Paramedic Service ("HPS"). As such, I have knowledge of the matters contained in this affidavit. Where I have relied on information that I have obtained from others, I have stated the source of the information and believe it to be true.
2. I make this affidavit as a supplement and update to my affidavit affirmed October 7, 2021.
3. I have reviewed the Ambulance Dispatch Reporting System ("ADRS") and electronic patient care records ("EPCR") data from January 2023 through June 30, 2024 as it pertains to the entire City and to fourteen specified geographic areas in

A4346

A8631

-2-

which I understand encampments have been most consistently located during this time (collectively the “Updated Encampment Areas”).

4. These locations are:

- (a) Bayfront Park/Waterfront Trail
- (b) Cathedral Dog Park
- (c) Fairfield Park
- (d) Beasley Park
- (e) City Hall/Whitehern Historic House & Garden
- (f) Wellington Park
- (g) Gage Park
- (h) Eastwood Park
- (i) Woodlands Park
- (j) Myrtle Park
- (k) J.C. Beemer Park
- (l) John and Rebecca Streets
- (m) The Bruce trail access near the intersection of Wentworth Street South and
Charlton Avenue East
- (n) Barton Street West and Tiffany Street

Attached hereto and marked as **Exhibit “A”** to this my Affidavit is a chart

A4347

-3-

summarizing the location criteria used to identify the above-noted locations.

5. As with my October 8, 2021 Affidavit, the John and Rebecca area is also an area where I am aware that homelessness-serving supports are located. The number of dispatches for the John and Rebecca area reflects all dispatches to assist a person with no fixed address whether or not that person resides in an encampment located at John and Rebecca. Based on the data available, it is not possible to differentiate between people who reside in an encampment as opposed to people with no fixed address who happen to be in the area when they require assistance.
6. The same applies for the City Hall/Whitehern Historic House & Garden area: this location is across the street from the YWCA which I am aware provides homelessness-serving supports. Again, the data do not permit differentiation between people who live in an encampment there, as opposed to people with no fixed address who happen to be in the area when they require assistance.
7. In reviewing this data, I have made observations about the rate of emergency dispatches to the Updated Encampment Areas and the reasons that were identified for those emergency dispatches.
8. From January 2024 through June 2024, there were a total of 378 dispatches to the Updated Encampment Areas, of which 99 were to the City Hall/Whitehern area and 5 were dispatches to the John and Rebecca area. The 274 dispatches to the Updated Encampment Areas reflect dispatches where HPS was requested to assist an encampment resident. The 104 dispatches to the City Hall/Whitehern and

-4-

John and Rebecca areas, as noted above, are not definitively linked to a person living in the encampment there. Attached hereto and marked as **Exhibit “B”** to this my Affidavit are two charts summarizing the dispatches to the Encampment Areas and to the John and Rebecca area, by number and by percentage. Attached hereto and marked as **Exhibit “C”** to this my Affidavit is a list of the details of each dispatch call that is summarized in the charts located in **Exhibit “B.”**

9. The frequency of dispatches to the Updated Encampment Areas has fluctuated, although each month in 2024 to date has had a higher number of dispatches to the Updated Encampment Areas than the same month in 2023 (2 in January 2023 vs 22 in January 2024; 6 in February 2023 vs 16 in February 2024; 8 in March 2023 vs 27 in March 2024; 12 in April 2023 vs 19 in April 2024; 27 in May 2023 vs 34 in May 2024; and 26 in June 202 vs 42 in June 2024). Attached hereto and marked as **Exhibit “D”** to this my Affidavit are a chart and a line graph summarizing the number of HPS dispatches by month to Encampment Areas from January 2023 to June 2024.
10. Regarding the patients’ primary problems as indicated on the EPCRs, I have again considered the primary (i.e. first on the list) patient problem reported by the paramedic for each patient.
11. From January 2023 through June 2024, the top three types of primary problems in all of the Updated Encampment Areas, collectively, were: (i) opioid overdose suspected (7%); (ii) trauma/injury (7%); and (iii) musculoskeletal (4%). Attached hereto and marked as **Exhibit “E”** are three charts that I prepared using the Data,

A8634

-5-

which depict the percentage breakdown within the top 10 different primary problems responded to in the Updated Encampment Areas between January 1, 2023 and June 30, 2024.

12. Another framework within which to review the data regarding the primary problems of patients is the percentage breakdown by medical category. For the primary problems reported among all of the Updated Encampment Areas between January 1, 2023 and June 30, 2024, the top three medical categories are (i) Endocrine/Toxicological (26%), (ii) General and Minor (25%); and (iii) Neurological (24%). Attached hereto and marked as **Exhibit "F"** are two charts that I prepared using the Data, which depict the overall percentage of different primary problems responded to in the Updated Encampment Areas between January 1, 2023 and June 30, 2024.

AFFIRMED by Wesley Loy at the City of Hamilton, in the Province of Ontario, before me on7/25/2024....., in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:

Bevin Shores

75E43E7E402846F

Commissioner for Taking Affidavits
(or as may be)

BEVIN SHORES

Signed by:

Wesley Loy

2AB5570845D441E...

WESLEY LOY

A4350

A8635

This is **Exhibit "A"** referred to in the Affidavit of Wesley Loy affirmed before me at the City of Hamilton, in the Province of Ontario, on7/25/2024..... in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:

Bevin Shores

Commissioner for Taking Affidavits
(or as may be)
Bevin Shores (LSO No. 56161F)

A4351

A8636

ID	Location	Nearest Municipal Address
1	Bayfront Park/Waterfront Trail	200 Harbour Front Drive
2	Cathedral Dog Park	707 King Street West
3	455 Charleton Avenue East	455 Charleton Avenue East
4	City Hall/Whitehern Historic House & Garden	71 Main Street West/41 Jackson Street West
4	City Hall/Whitehern Historic House & Garden	Jackson Street W. & MacNab Street South
5	397 York Boulevard	397 York Boulevard
6	Gage Park	1000 Main Street East
7	80 Pearl Street North	80 Pearl Street North
8	Woodlands Park	501 Barton Street East
9	J.C Beemer Park	68 Victoria Avenue North
10	Scenic Woods Park	220 Lavender Drive
11	Roxborough Park	70 Reid Ave North
12	Fairfield Park	1501 Barton Street East
13	Beasley Park	96 Mary Street
14	Stirton Tot Lot	Wilson & Stirton Streets
15	Jackie Washington Park	184-196 Simcoe Street East
16	Wellington Park	399 King Street East
17	Eastwood Park	111 Burlington Street East
18	Claremont Access Parkette	65 Wellington Street South
19	Peace Garden	80c Hunter Street West
20	Myrtle Park	13 Delaware Ave
21	Hillcrest Park	8 Eastwood Street
22	Bruce Trail	241 Wentworth St. South/499 Charlton Ave E.
23	John & Rebecca	John & Rebecca Streets
24	Barton/Tiffany	32 Tiffany/128 Barton St. W./230 Caroline St. N.

A4352

A8637

This is **Exhibit "B"** referred to in the Affidavit of Wesley Loy affirmed before me at the City of Hamilton, in the Province of Ontario, on7/25/2024..... in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:

Bevin Shores

Commissioner for Taking Affidavits
(or as may be)
Bevin Shores (LSO No. 56161F)

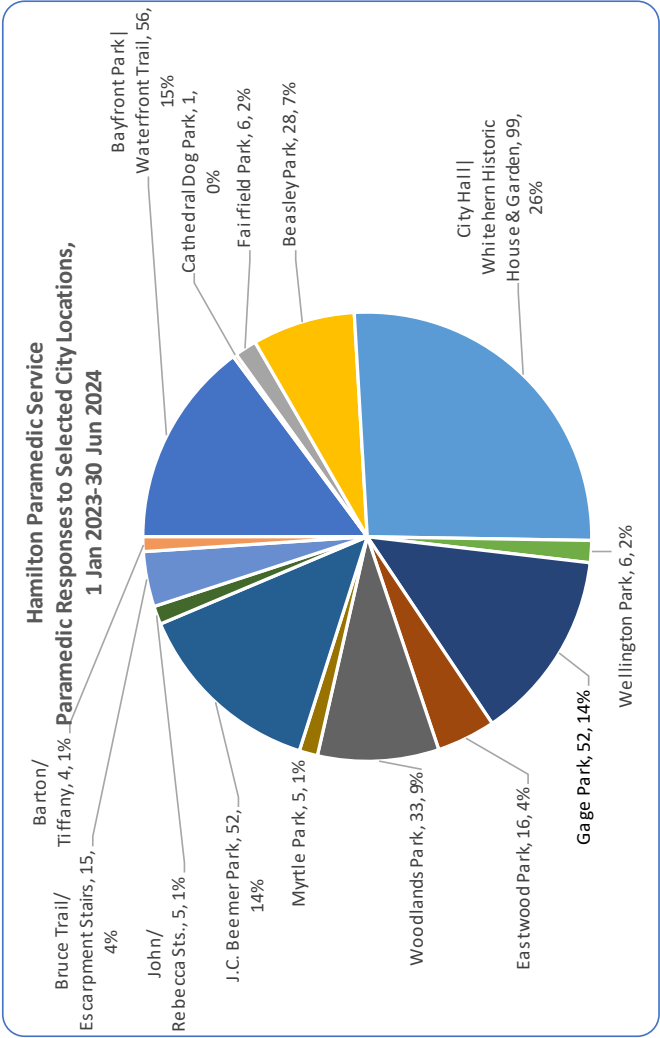
A4353

Responses	Bayfront Park Waterfront Trail	Cathedral Dog Park	Fairfield Park	Beasley Park	City Hall Whitehern Historic House & Garden	Wellington Park	Gage Park	Eastwood Park	Woodlands Park	Myrtle Park	J.C. Beemer Park	John/ Rebecca Sts.	Bruce Trail/ Escarpment Stairs	Barton/ Tiffany	Total
	56	1	6	28	99	6	52	16	33	5	52	5	15	4	378

Source: ADDS Data Warehouse

Prepared by: Wesley Loy, Data & Records Coordinator

12 Jul
2024



A8639

This is **Exhibit "C"** referred to in the Affidavit of Wesley Loy affirmed before me at the City of Hamilton, in the Province of Ontario, on ^{7/25/2024}..... in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:

Bevin Shores

Commissioner for Taking Affidavits
(or as may be)
Bevin Shores (LSO No. 56161F)

A4355

A8640

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
1	18342669	2001	20 Jan 2023 01:24:48	200 Harbour Front Dr	Park - Municipal	20 Jan 2023 01:33:08	2023	1
1	18367765	2001	15 Mar 2023 06:54:21	200 Harbour Front Dr	Park - Municipal	15 Mar 2023 07:03:17	2023	3
1	18381447	2014	13 Apr 2023 22:35:02	200 Harbour Front Dr	Park - Municipal	13 Apr 2023 22:42:07	2023	4
1	18395501	2091	11 May 2023 20:08:27	200 Harbour Front Dr	Terrain	11 May 2023 20:18:03	2023	5
1	18396462	2027	13 May 2023 13:44:32	200 Harbour Front Dr	Terrain	13 May 2023 13:57:09	2023	5
1	18398882	2006	18 May 2023 13:43:02	200 Harbour Front Dr	Terrain	18 May 2023 13:57:58	2023	5
1	18403923	2014	28 May 2023 20:09:03	200 Harbour Front Dr	Transit	28 May 2023 20:18:44	2023	5
1	18407129	2006	03 Jun 2023 15:02:06	200 HARBOUR FRONT DR		03 Jun 2023 15:10:14	2023	6
1	18407160	2006	03 Jun 2023 15:51:30	200 Harbour Front Dr	Terrain	03 Jun 2023 15:51:41	2023	6
1	18410614	2005	10 Jun 2023 10:39:50	200 Harbour Front Dr	Transit	10 Jun 2023 10:48:12	2023	6
1	18410836	2025	10 Jun 2023 18:41:19	200 Harbour Front Dr	Terrain	10 Jun 2023 18:52:42	2023	6
1	18421543	2023	01 Jul 2023 15:31:54	200 Harbour Front Dr	Terrain	01 Jul 2023 16:00:17	2023	7
1	18426257	2038	09 Jul 2023 20:50:35	200 Harbour Front Dr	Terrain	09 Jul 2023 21:01:23	2023	7
1	18432978	2005	22 Jul 2023 21:19:10	200 Harbour Front Dr	Terrain	22 Jul 2023 21:22:35	2023	7
1	18437813	2005	01 Aug 2023 10:20:46	200 Harbour Front Dr	Terrain	01 Aug 2023 10:27:33	2023	8
1	18438109	2010	01 Aug 2023 21:05:09	200 Harbour Front Dr	Terrain	01 Aug 2023 21:15:12	2023	8

A4356

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
1	18440642	2033	06 Aug 2023 17:30:27	200 Harbour Front Dr	Terrain	06 Aug 2023 17:37:54	2023	8
1	18443257	2030	11 Aug 2023 16:11:35	200 Harbour Front Dr	Terrain	11 Aug 2023 16:22:12	2023	8
1	18444210	2038	13 Aug 2023 13:30:27	200 Harbour Front Dr	Transit	13 Aug 2023 13:54:06	2023	8
1	18444818	2016	14 Aug 2023 19:17:03	200 Harbour Front Dr	Terrain	14 Aug 2023 19:28:01	2023	8
1	18472243	2024	03 Oct 2023 21:52:00	200 Harbour Front Dr	Terrain	03 Oct 2023 21:59:17	2023	10
1	18472270	2020	03 Oct 2023 23:38:20	200 Harbour Front Dr	Terrain	03 Oct 2023 23:44:23	2023	10
1	18472278	2092	03 Oct 2023 23:56:53	200 HARBOUR FRONT DR		04 Oct 2023 00:05:31	2023	10
1	18486879	2011	02 Nov 2023 10:53:16	200 Harbour Front Dr	Terrain	02 Nov 2023 11:36:38	2023	11
1	18502365	2088	01 Dec 2023 19:57:00	200 HARBOUR FRONT DR	Transit	01 Dec 2023 20:01:00	2023	12
1	18524223	2033	10 Jan 2024 12:42:00	200 Harbour Front Dr	Terrain	10 Jan 2024 12:44:00	2024	1
1	18526285	2091	14 Jan 2024 15:07:00	200 Harbour Front Dr	Terrain	14 Jan 2024 15:13:00	2024	1
1	18532016	2544	26 Jan 2024 07:13:00	200 Harbour Front Dr	Terrain	26 Jan 2024 07:19:00	2024	1
1	18533007	2006	28 Jan 2024 06:10:00	200 Harbour Front Dr	Terrain	28 Jan 2024 06:30:00	2024	1
1	18534451	2091	31 Jan 2024 03:24:00	200 HARBOUR FRONT DR	Hospitality	31 Jan 2024 03:35:00	2024	1
1	18539791	2092	11 Feb 2024 07:51:00	200 Harbour Front Dr	Terrain	11 Feb 2024 08:07:00	2024	2
1	18543638	2033	19 Feb 2024 03:05:00	200 Harbour Front Dr	Terrain	19 Feb 2024 03:18:00	2024	2

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
1	18567138	2B30	08 Apr 2024 11:38:00	200 Harbour Front Dr	Terrain	08 Apr 2024 11:38:00	2024	4
1	18567138	2B31	08 Apr 2024 11:38:00	200 Harbour Front Dr	Terrain	08 Apr 2024 11:38:00	2024	4
1	18568963	2006	11 Apr 2024 19:25:00	200 HARBOUR FRONT DR	Public Places	11 Apr 2024 19:35:00	2024	4
1	18571489	2013	16 Apr 2024 18:31:00	200 Harbour Front Dr	Terrain	16 Apr 2024 18:42:00	2024	4
1	18574998	2025	24 Apr 2024 09:19:00	200 Harbour Front Dr	Terrain	24 Apr 2024 09:25:00	2024	4
1	18575884	2091	26 Apr 2024 03:05:00	200 Harbour Front Dr	Terrain	26 Apr 2024 03:14:00	2024	4
1	18580181	2033	04 May 2024 19:32:00	200 HARBOUR FRONT DR	Public Places	04 May 2024 19:46:00	2024	5
1	18582438	2033	09 May 2024 05:40:00	200 Harbour Front Dr	Terrain	09 May 2024 05:44:00	2024	5
1	18583324	2031	10 May 2024 23:06:00	200 Harbour Front Dr	Terrain	10 May 2024 23:18:00	2024	5
1	18587034	2019	18 May 2024 12:02:00	200 Harbour Front Dr	Terrain	18 May 2024 12:09:00	2024	5
1	18587149	2019	18 May 2024 16:03:00	200 Harbour Front Dr	Terrain	18 May 2024 16:22:00	2024	5
1	18587392	2031	19 May 2024 02:33:00	200 Harbour Front Dr	Transit	19 May 2024 02:38:00	2024	5
1	18587876	2011	20 May 2024 04:36:00	200 Harbour Front Dr	Terrain	20 May 2024 04:44:00	2024	5
1	18587876	2031	20 May 2024 04:36:00	200 Harbour Front Dr	Terrain	20 May 2024 04:44:00	2024	5
1	18588020	2033	20 May 2024 13:32:00	200 Harbour Front Dr	Terrain	20 May 2024 13:42:00	2024	5
1	18590042	2029	24 May 2024 11:04:00	200 Harbour Front Dr	Terrain	24 May 2024 11:12:00	2024	5

A8643

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
1	18590139	2090	24 May 2024 14:00:00	200 Harbour Front Dr	Terrain	24 May 2024 14:08:00	2024	5
1	18591181	2091	26 May 2024 15:05:00	200 Harbour Front Dr	Terrain	26 May 2024 15:10:00	2024	5
1	18592420	2033	28 May 2024 21:59:00	200 Harbour Front Dr	Terrain	28 May 2024 22:04:00	2024	5
1	18592420	2545	28 May 2024 21:59:00	200 Harbour Front Dr	Terrain	28 May 2024 22:04:00	2024	5
1	18592432	2031	28 May 2024 22:47:00	200 Harbour Front Dr	Terrain	28 May 2024 22:57:00	2024	5
1	18606590	2093	22 Jun 2024 17:53:00	200 Harbour Front Dr	Terrain	22 Jun 2024 18:02:00	2024	6
1	18606647	2544	22 Jun 2024 19:45:00	200 Harbour Front Dr	Terrain	22 Jun 2024 19:50:00	2024	6
1	18606686	2033	22 Jun 2024 20:59:00	200 Harbour Front Dr	Terrain	22 Jun 2024 21:07:00	2024	6
2	18597242	2031	06 Jun 2024 10:05:00	707 King St W		06 Jun 2024 10:12:00	2024	6
3								
4	18354214	2031	14 Feb 2023 13:07:53	71 Main St W	Public Places	2023-02-14 13:10	2023	2
4	18354773	2005	15 Feb 2023 15:07:53	71 Main St W	Public Places	2023-02-15 15:17	2023	2
4	18355908	2014	17 Feb 2023 22:34:35	71 Main St W	Public Places	2023-02-17 22:48	2023	2
4	18369425	2031	18 Mar 2023 17:33:11	71 Main St W	Public Places	2023-03-18 17:37	2023	3
4	18381659	2010	14 Apr 2023 11:36:11	71 Main St W	Public Places	2023-04-14 11:42	2023	4
4	18388826	2016	28 Apr 2023 16:17:27	71 Main St W	Public Places	2023-04-28 16:26	2023	4

A4359

A8644

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
4	18390787	2010	02 May 2023 15:07:01	71 Main St W	Public Places	2023-05-02 15:12	2023	5
4	18398497	2012	17 May 2023 16:50:44	71 Main St W	Public Places	2023-05-17 16:55	2023	5
4	18398663	2031	18 May 2023 03:33:31	71 Main St W	Public Places	2023-05-18 3:40	2023	5
4	18400543	2031	22 May 2023 01:10:46	71 Main St W	Public Places	2023-05-22 1:15	2023	5
4	18401822	2033	24 May 2023 15:30:21	71 Main St W	Public Places	2023-05-24 16:08	2023	5
4	18404106	2092	29 May 2023 08:41:03	71 Main St W	Public Places	2023-05-29 9:00	2023	5
4	18409070	2094	07 Jun 2023 08:02:12	71 Main St W	Public Places	2023-06-07 8:32	2023	6
4	18409596	2031	08 Jun 2023 09:44:27	71 Main St W	Public Places	2023-06-08 10:00	2023	6
4	18417005	2092	23 Jun 2023 04:16:13	71 Main St W	Public Places	2023-06-23 4:27	2023	6
4	18419322	2022	27 Jun 2023 09:20:23	71 Main St W	Public Places	2023-06-27 9:29	2023	6
4	18426421	2019	10 Jul 2023 08:03:23	71 Main St W	Public Places	2023-07-10 8:10	2023	7
4	18429744	2030	16 Jul 2023 14:33:18	71 Main St W	Public Places	2023-07-16 14:44	2023	7
4	18432529	2019	21 Jul 2023 22:23:48	71 Main St W	Public Places	2023-07-21 22:29	2023	7
4	18432895	2013	22 Jul 2023 18:12:56	71 Main St W	Public Places	2023-07-22 18:22	2023	7
4	18438197	2018	02 Aug 2023 01:37:53	71 Main St W	Public Places	2023-08-02 1:45	2023	8
4	18440396	2022	06 Aug 2023 06:25:00	71 Main St W	Public Places	2023-08-06 6:31	2023	8

A4360

A8645

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
4	18441030	2022	07 Aug 2023 13:03:11	71 Main St W	Public Places	2023-08-07 13:10	2023	8
4	18447967	2031	20 Aug 2023 22:03:25	71 Main St W	Public Places	2023-08-20 22:09	2023	8
4	18448400	2031	21 Aug 2023 19:00:20	71 Main St W	Public Places	2023-08-21 19:05	2023	8
4	18448699	2022	22 Aug 2023 12:09:54	71 Main St W	Public Places	2023-08-22 12:13	2023	8
4	18448756	2029	22 Aug 2023 14:27:42	71 Main St W	Public Places	2023-08-22 14:34	2023	8
4	18449896	2031	24 Aug 2023 16:22:58	71 Main St W	Public Places	2023-08-24 16:39	2023	8
4	18452401	2013	29 Aug 2023 15:22:35	71 Main St W	Public Places	2023-08-29 15:33	2023	8
4	18455315	2032	03 Sep 2023 23:53:06	71 Main St W	Public Places	2023-09-04 0:01	2023	9
4	18456202	2023	05 Sep 2023 13:50:59	71 Main St W	Public Places	2023-09-05 13:59	2023	9
4	18469814	2033	30 Sep 2023 02:33:30	71 Main St W	Public Places	2023-09-30 2:48	2023	9
4	18470083	2020	30 Sep 2023 14:46:09	71 Main St W	Public Places	2023-09-30 14:53	2023	9
4	18495401	2022	18 Nov 2023 15:20:34	71 Main St W	Public Places	2023-11-18 15:25	2023	11
4	18495974	2017	19 Nov 2023 21:19:50	71 Main St W	Public Places	2023-11-19 21:25	2023	11
4	18499128	2017	25 Nov 2023 17:28:43	71 Main St W	Public Places	2023-11-25 17:52	2023	11
4	18394734	2025	10 May 2023 11:38:43	41 Jackson St W	Public Places	2023-05-10 11:50	2023	5
4	18413994	2022	17 Jun 2023 04:34:00	41 Jackson St W	Public Places	2023-06-17 4:40	2023	6

A4361

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
4	18420434	2022	29 Jun 2023 15:12:13	41 Jackson St W	Public Places	2023-06-29 15:19	2023	6
4	18425723	2019	09 Jul 2023 00:07:34	41 Jackson St W	Public Places	2023-07-09 0:10	2023	7
4	18427642	2014	12 Jul 2023 14:25:31	41 Jackson St W	Public Places	2023-07-12 14:29	2023	7
4	18432873	2019	22 Jul 2023 17:31:18	41 Jackson St W	Public Places	2023-07-22 17:36	2023	7
4	18440741	2022	06 Aug 2023 22:01:47	41 JACKSON ST W	Public Places	2023-08-06 22:07	2023	8
4	18443742	2022	12 Aug 2023 15:03:01	41 Jackson St W		2023-08-12 15:08	2023	8
4	18447968	2022	20 Aug 2023 22:06:53	41 Jackson St W	Public Places	2023-08-20 22:10	2023	8
4	18510403	2088	16 Dec 2023 02:09:00	71 Main St W	Public Places	2023-12-16 2:15	2023	12
4	18520768	2019	04 Jan 2024 01:33:00	71 Main St W	Public Places	2024-01-04 1:38	2024	1
4	18522366	2020	07 Jan 2024 04:28:00	71 Main St W	Public Places	2024-01-07 4:51	2024	1
4	18525883	2011	13 Jan 2024 18:27:00	71 Main St W	Public Places	2024-01-13 18:45	2024	1
4	18531981	2091	26 Jan 2024 04:20:00	71 Main St W	Public Places	2024-01-26 4:33	2024	1
4	18531998	2033	26 Jan 2024 05:50:00	71 Main St W	Public Places	2024-01-26 6:06	2024	1
4	18535765	2038	02 Feb 2024 16:18:00	71 Main St W	Public Places	2024-02-02 16:25	2024	2
4	18535765	2031	02 Feb 2024 16:18:00	71 Main St W	Public Places	2024-02-02 16:35	2024	2
4	18540966	2544	13 Feb 2024 15:38:00	71 Main St W	Public Places	2024-02-13 15:46	2024	2

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
4	18545032	2544	22 Feb 2024 01:22:00	71 Main St W	Public Places	2024-02-22 1:33	2024	2
4	18548525	2019	29 Feb 2024 01:02:00	71 Main St W	Public Places	2024-02-29 1:13	2024	2
4	18549213	2025	01 Mar 2024 09:55:00	71 Main St W	Public Places	2024-03-01 10:12	2024	3
4	18549605	2544	02 Mar 2024 02:41:00	71 Main St W	Public Places	2024-03-02 2:47	2024	3
4	18552001	2029	06 Mar 2024 17:06:00	71 Main St W	Public Places	2024-03-06 17:16	2024	3
4	18554166	2092	11 Mar 2024 12:40:00	71 Main St W	Public Places	2024-03-11 12:46	2024	3
4	18554166	2383	11 Mar 2024 12:40:00	71 Main St W	Public Places	2024-03-11 12:45	2024	3
4	18555973	2092	15 Mar 2024 11:05:00	71 Main St W	Public Places	2024-03-15 11:16	2024	3
4	18557206	2002	17 Mar 2024 19:55:00	71 Main St W	Public Places	2024-03-17 20:28	2024	3
4	18557831	2033	19 Mar 2024 08:29:00	71 Main St W	Public Places	2024-03-19 8:46	2024	3
4	18559178	2026	22 Mar 2024 10:08:00	71 Main St W	Public Places	2024-03-22 10:16	2024	3
4	18560257	2024	24 Mar 2024 16:52:00	71 Main St W	Public Places	2024-03-24 17:06	2024	3
4	18561167	2027	26 Mar 2024 17:12:00	71 Main St W	Public Places	2024-03-26 17:42	2024	3
4	18561525	2027	27 Mar 2024 11:17:00	71 Main St W	Public Places	2024-03-27 11:19	2024	3
4	18561769	2022	27 Mar 2024 20:41:00	71 Main St W	Public Places	2024-03-27 20:47	2024	3
4	18561944	2089	28 Mar 2024 10:23:00	71 Main St W	Public Places	2024-03-28 11:11	2024	3

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
4	18564279	2033	02 Apr 2024 11:44:00	71 Main St W	Public Places	2024-04-02 12:00	2024	4
4	18566705	2020	07 Apr 2024 12:31:00	71 MAIN ST W	Public Places	2024-04-07 12:37	2024	4
4	18568509	2022	10 Apr 2024 22:20:00	71 Main St W	Public Places	2024-04-10 22:28	2024	4
4	18578719	2036	01 May 2024 23:42:00	71 Main St W	Public Places	2024-05-02 0:30	2024	5
4	18579080	2011	02 May 2024 15:48:00	71 Main St W	Public Places	2024-05-02 16:04	2024	5
4	18581628	2031	07 May 2024 14:22:00	71 Main St W	Public Places	2024-05-07 14:29	2024	5
4	18582799	2031	09 May 2024 20:41:00	71 Main St W	Public Places	2024-05-09 20:44	2024	5
4	18585133	2011	14 May 2024 15:43:00	71 Main St W	Public Places	2024-05-14 15:53	2024	5
4	18588433	2032	21 May 2024 11:13:00	71 Main St W	Public Places	2024-05-21 11:18	2024	5
4	18589317	2038	23 May 2024 01:52:00	71 Main St W	Public Places	2024-05-23 2:32	2024	5
4	18590039	2011	24 May 2024 10:56:00	71 Main St W	Public Places	2024-05-24 11:59	2024	5
4	18592263	2091	28 May 2024 15:38:00	71 Main St W	Public Places	2024-05-28 15:50	2024	5
4	18596240	2005	04 Jun 2024 13:09:00	71 Main St W	Public Places	2024-06-04 13:14	2024	6
4	18598467	2011	08 Jun 2024 17:48:00	71 Main St W	Public Places	2024-06-08 17:56	2024	6
4	18599218	2033	10 Jun 2024 02:09:00	71 Main St W	Public Places	2024-06-10 2:25	2024	6
4	18604809	2090	19 Jun 2024 18:54:00	71 Main St W	Public Places	2024-06-19 19:00	2024	6

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
4	18606568	2011	22 Jun 2024 17:18:00	71 Main St W	Public Places	2024-06-22 17:26	2024	6
4	18609401	2031	27 Jun 2024 18:17:00	71 Main St W	Public Places	2024-06-27 18:23	2024	6
4	18609401	2023	27 Jun 2024 18:17:00	71 Main St W	Public Places	2024-06-27 18:27	2024	6
4	18504002	2006	04 Dec 2023 13:28:00	41 Jackson St W	Public Places	2023-12-04 13:40	2023	12
4	18505514	2088	07 Dec 2023 00:54:00	41 Jackson St W	Public Places	2023-12-07 0:58	2023	12
4	18514567	2088	24 Dec 2023 09:44:00	41 Jackson St W	Public Places	2023-12-24 9:51	2023	12
4	18562021	2020	28 Mar 2024 13:35:00	Jackson St W & Macnab St S		2024-03-28 13:40	2024	3
4	18562021	2376	28 Mar 2024 13:35:00	Jackson St W & Macnab St S		2024-03-28 13:37	2024	3
4	18577871	2004	30 Apr 2024 15:00:00	Jackson St W & Macnab St S		2024-04-30 15:09	2024	4
4	18510488	2031	16 Dec 2023 08:57:00	Macnab St S & Jackson St W		2023-12-16 9:01	2023	12
4	18524799	2006	11 Jan 2024 15:16:00	Macnab St S & Jackson St W		2024-01-11 15:25	2024	1
4	18554416	2091	11 Mar 2024 23:24:00	Macnab St S & Jackson St W		2024-03-11 23:33	2024	3
4	18611094	2031	30 Jun 2024 18:11:00	Macnab St S & Jackson St W		2024-06-30 18:18	2024	6
5								
6	18361690	2031	01 Mar 2023 23:18:37	1000 MAIN ST E	Park - Municipal	2023-03-01 23:40	2023	3
6	18379942	2002	10 Apr 2023 22:47:15	1000 MAIN ST E	Park - Municipal	2023-04-10 22:55	2023	4

A8650

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
6	18381371	2010	13 Apr 2023 19:26:48	1000 Main St E	Park - Municipal	2023-04-13 19:33	2023	4
6	18397403	2002	15 May 2023 14:12:34	1000 Main St E	Terrain	2023-05-15 14:18	2023	5
6	18400305	2002	21 May 2023 16:08:53	1000 Main St E	Terrain	2023-05-21 16:24	2023	5
6	18401914	2002	24 May 2023 19:28:47	1000 Main St E	Terrain	2023-05-24 19:36	2023	5
6	18402512	2002	26 May 2023 06:47:39	1000 Main St E	Terrain	2023-05-26 6:53	2023	5
6	18403228	2019	27 May 2023 14:44:12	1000 Main St E	Terrain	2023-05-27 15:34	2023	5
6	18412547	2092	14 Jun 2023 09:03:08	1000 Main St E	Terrain	2023-06-14 9:12	2023	6
6	18414405	2092	17 Jun 2023 22:06:06	1000 Main St E	Terrain	2023-06-17 22:16	2023	6
6	18415006	2002	19 Jun 2023 01:34:26	1000 Main St E	Terrain	2023-06-19 1:43	2023	6
6	18415710	2091	20 Jun 2023 12:18:53	1000 Main St E	Terrain	2023-06-20 12:44	2023	6
6	18419992	2002	28 Jun 2023 16:49:14	1000 Main St E	Terrain	2023-06-28 16:59	2023	6
6	18422046	2033	02 Jul 2023 11:32:29	1000 Main St E	Terrain	2023-07-02 11:40	2023	7
6	18440306	2092	06 Aug 2023 00:05:01	1000 Main St E	Terrain	2023-08-06 0:16	2023	8
6	18440552	2027	06 Aug 2023 13:17:33	1000 Main St E	Terrain	2023-08-06 13:42	2023	8
6	18440552	2381	06 Aug 2023 13:17:33	1000 Main St E	Terrain	2023-08-06 13:20	2023	8
6	18443458	2002	12 Aug 2023 00:39:55	1000 Main St E	Terrain	2023-08-12 0:49	2023	8

A4366

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
6	18444197	2010	13 Aug 2023 13:02:39	1000 Main St E	Terrain	2023-08-13 13:09	2023	8
6	18447767	2031	20 Aug 2023 13:57:59	1000 Main St E	Terrain	2023-08-20 14:08	2023	8
6	18447767	2382	20 Aug 2023 13:57:59	1000 Main St E	Terrain	2023-08-20 14:23	2023	8
6	18447772	2006	20 Aug 2023 14:05:48	1000 Main St E	Terrain	2023-08-20 14:18	2023	8
6	18447809	2002	20 Aug 2023 15:24:21	1000 Main St E	Terrain	2023-08-20 15:32	2023	8
6	18449452	2091	23 Aug 2023 19:18:37	1000 Main St E	Terrain	2023-08-23 19:24	2023	8
6	18451328	2002	27 Aug 2023 09:50:03	1000 Main St E	Terrain	2023-08-27 9:57	2023	8
6	18451416	2013	27 Aug 2023 13:10:56	1000 Main St E	Terrain	2023-08-27 13:30	2023	8
6	18455798	2027	04 Sep 2023 19:43:39	1000 Main St E	Terrain	2023-09-04 19:48	2023	9
6	18466131	2013	23 Sep 2023 12:02:34	1000 Main St E	Terrain	2023-09-23 19:18	2023	9
6	18466960	2008	24 Sep 2023 23:06:37	1000 Main St E	Terrain	2023-09-24 23:25	2023	9
6	18475666	2025	10 Oct 2023 19:50:46	1000 Main St E	Terrain	2023-10-10 20:16	2023	10
6	18476814	2005	13 Oct 2023 13:27:46	1000 Main St E	Terrain	2023-10-13 13:35	2023	10
6	18484206	2002	28 Oct 2023 05:06:48	1000 Main St E	Terrain	2023-10-28 5:14	2023	10
6	18484349	2002	28 Oct 2023 12:10:43	1000 Main St E	Terrain	2023-10-28 12:19	2023	10
6	18548672	2091	29 Feb 2024 09:51:00	1000 Main St E	Terrain	2024-02-29 9:58	2024	2

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
6	18554100	2025	11 Mar 2024 09:47:00	1000 Main St E	Terrain	2024-03-11 10:00	2024	3
6	18555054	2014	13 Mar 2024 10:40:00	1000 Main St E	Terrain	2024-03-13 11:09	2024	3
6	18557100	2018	17 Mar 2024 14:54:00	1000 Main St E	Terrain	2024-03-17 15:09	2024	3
6	18562014	2087	28 Mar 2024 13:16:00	1000 Main St E		2024-03-28 13:21	2024	3
6	18564784	2087	03 Apr 2024 13:17:00	1000 Main St E	Terrain	2024-04-03 13:24	2024	4
6	18586259	2546	16 May 2024 20:09:00	1000 MAIN ST E		2024-05-16 20:16	2024	5
6	18596480	2033	04 Jun 2024 21:07:00	1000 Main St E	Terrain	2024-06-04 21:17	2024	6
6	18600939	2541	13 Jun 2024 11:00:00	1000 Main St E	Terrain	2024-06-13 11:17	2024	6
6	18603413	2011	17 Jun 2024 17:02:00	1000 Main St E	Terrain	2024-06-17 17:11	2024	6
6	18603413	2023	17 Jun 2024 17:02:00	1000 Main St E	Terrain	2024-06-17 17:11	2024	6
6	18603413	2031	17 Jun 2024 17:02:00	1000 Main St E	Terrain	2024-06-17 17:10	2024	6
6	18603413	2382	17 Jun 2024 17:02:00	1000 Main St E	Terrain	2024-06-17 17:13	2024	6
6	18603441	2023	17 Jun 2024 17:35:00	1000 Main St E	Terrain	2024-06-17 17:40	2024	6
6	18603441	2544	17 Jun 2024 17:35:00	1000 Main St E	Terrain	2024-06-17 18:00	2024	6
6	18604152	2027	18 Jun 2024 18:45:00	1000 Main St E	Recreation	2024-06-18 18:51	2024	6
6	18607251	2546	23 Jun 2024 19:19:00	1000 Main St E	Terrain	2024-06-23 19:36	2024	6

A8652

A4368

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
6	18610169	2031	29 Jun 2024 06:17:00	1000 Main St E	Terrain	2024-06-29 6:23	2024	6
6	18610660	2031	29 Jun 2024 23:49:00	1000 Main St E	Terrain	2024-06-29 23:55	2024	6
7								
8	18359250	2014	24 Feb 2023 22:27:44	501 Barton St E	Public Places	2023-02-24 22:36	2023	2
8	18379172	2091	09 Apr 2023 06:48:29	501 Barton St E	Public Places	2023-04-09 6:55	2023	4
8	18382995	2006	17 Apr 2023 07:54:05	501 Barton St E	Public Places	2023-04-17 7:59	2023	4
8	18388664	2002	28 Apr 2023 09:58:01	501 Barton St E	Public Places	2023-04-28 10:15	2023	4
8	18388664	2031	28 Apr 2023 09:58:01	501 Barton St E	Public Places	2023-04-28 10:12	2023	4
8	18397151	2033	15 May 2023 00:12:39	501 Barton St E	Public Places	2023-05-15 0:26	2023	5
8	18399887	2006	20 May 2023 19:01:37	501 Barton St E	Public Places	2023-05-20 19:07	2023	5
8	18401202	2033	23 May 2023 12:30:33	501 Barton St E	Public Places	2023-05-23 12:40	2023	5
8	18401873	2024	24 May 2023 17:29:37	501 Barton St E	Public Places	2023-05-24 17:35	2023	5
8	18405665	2033	01 Jun 2023 09:06:40	501 Barton St E	Public Places	2023-06-01 9:14	2023	6
8	18406744	2038	02 Jun 2023 21:27:36	501 Barton St E	Public Places	2023-06-02 21:39	2023	6
8	18409859	2002	08 Jun 2023 20:33:59	501 Barton St E	Public Places	2023-06-08 20:36	2023	6
8	18414078	2091	17 Jun 2023 09:36:00	501 Barton St E	Public Places	2023-06-17 9:42	2023	6

A8654

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
8	18421320	2033	01 Jul 2023 06:11:10	501 Barton St E	Public Places	2023-07-01 6:16	2023	7
8	18422431	2019	03 Jul 2023 05:09:53	501 Barton St E	Public Places	2023-07-03 5:16	2023	7
8	18425662	2006	08 Jul 2023 21:22:44	501 Barton St E	Public Places	2023-07-08 21:27	2023	7
8	18425662	2010	08 Jul 2023 21:22:44	501 Barton St E	Public Places	2023-07-08 21:28	2023	7
8	18428539	2023	14 Jul 2023 10:50:44	501 Barton St E	Public Places	2023-07-14 10:55	2023	7
8	18440437	2033	06 Aug 2023 08:02:58	501 Barton St E	Public Places	2023-08-06 8:08	2023	8
8	18441781	2024	08 Aug 2023 23:53:08	501 Barton St E	Public Places	2023-08-08 23:59	2023	8
8	18449517	2012	23 Aug 2023 22:07:29	501 Barton St E	Public Places	2023-08-23 22:21	2023	8
8	18449517	2091	23 Aug 2023 22:07:29	501 Barton St E	Public Places	2023-08-23 22:10	2023	8
8	18449517	2381	23 Aug 2023 22:07:29	501 Barton St E	Public Places	2023-08-23 22:13	2023	8
8	18452314	2026	29 Aug 2023 11:48:37	501 Barton St E	Public Places	2023-08-29 11:54	2023	8
8	18455887	2033	04 Sep 2023 22:45:44	501 Barton St E	Public Places	2023-09-04 22:54	2023	9
8	18461775	2012	15 Sep 2023 12:59:59	501 Barton St E	Public Places	2023-09-15 13:03	2023	9
8	18480483	2092	21 Oct 2023 05:14:42	501 Barton St E	Public Places	2023-10-21 5:20	2023	10
8	18486717	2027	01 Nov 2023 23:00:54	501 Barton St E	Public Places	2023-11-01 23:16	2023	11
8	18509242	2027	13 Dec 2023 23:23:00	501 Barton St E	Public Places	2023-12-13 23:28	2023	12

A4370

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
8	18519926	2383	02 Jan 2024 16:50:00	501 Barton St E	Public Places	2024-01-02 16:52	2024	1
8	18519926	2349	02 Jan 2024 16:50:00	501 Barton St E	Public Places	2024-01-02 17:08	2024	1
8	18519960	2349	02 Jan 2024 17:43:00	501 Barton St E	Public Places	2024-01-02 17:43	2024	1
8	18557265	2033	17 Mar 2024 22:54:00	501 BARTON ST E		2024-03-17 22:59	2024	3
9	18349700	2091	04 Feb 2023 13:45:28	68 Victoria Av N	Park - Municipal	2023-02-04 13:51	2023	2
9	18363192	2031	05 Mar 2023 05:19:29	68 Victoria Av N	Park - Municipal	2023-03-05 5:23	2023	3
9	18363547	2033	06 Mar 2023 00:35:11	68 Victoria Av N	Park - Municipal	2023-03-06 0:42	2023	3
9	18406161	2033	01 Jun 2023 23:25:37	68 Victoria Av N	Terrain	2023-06-01 23:27	2023	6
9	18418440	2012	25 Jun 2023 16:50:00	68 Victoria Av N	Recreation	2023-06-25 16:57	2023	6
9	18423610	2016	05 Jul 2023 10:15:54	68 Victoria Av N	Terrain	2023-07-05 10:21	2023	7
9	18430006	2019	17 Jul 2023 02:49:43	68 Victoria Av N	Terrain	2023-07-17 2:54	2023	7
9	18430006	2091	17 Jul 2023 02:49:43	68 Victoria Av N	Terrain	2023-07-17 3:11	2023	7
9	18431696	2013	20 Jul 2023 08:33:49	68 Victoria Av N	Terrain	2023-07-20 8:41	2023	7
9	18452620	2031	29 Aug 2023 22:41:51	68 Victoria Av N	Terrain	2023-08-29 22:46	2023	8
9	18453868	2541	01 Sep 2023 11:01:42	68 Victoria Av N	Terrain	2023-09-01 11:08	2023	9
9	18460633	2031	13 Sep 2023 04:23:01	68 Victoria Av N	Terrain	2023-09-13 4:28	2023	9

A8656

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
9	18461539	2022	15 Sep 2023 01:33:08	68 Victoria Av N	Terrain	2023-09-15 1:37	2023	9
9	18461539	2092	15 Sep 2023 01:33:08	68 Victoria Av N	Terrain	2023-09-15 1:48	2023	9
9	18463380	2092	18 Sep 2023 10:44:06	68 Victoria Av N	Terrain	2023-09-18 10:53	2023	9
9	18464864	2015	21 Sep 2023 03:10:15	68 Victoria Av N	Terrain	2023-09-21 3:12	2023	9
9	18468012	2016	26 Sep 2023 21:42:49	68 Victoria Av N	Terrain	2023-09-26 21:47	2023	9
9	18473253	2029	05 Oct 2023 15:42:37	68 Victoria Av N		2023-10-05 15:48	2023	10
9	18480079	2022	20 Oct 2023 10:28:36	68 Victoria Av N	Terrain	2023-10-20 10:32	2023	10
9	18480619	2022	21 Oct 2023 11:50:36	68 Victoria Av N	Terrain	2023-10-21 11:55	2023	10
9	18483115	2091	26 Oct 2023 03:19:46	68 Victoria Av N	Terrain	2023-10-26 3:32	2023	10
9	18488374	2033	05 Nov 2023 03:45:02	68 Victoria Av N	Terrain	2023-11-05 3:54	2023	11
9	18494113	2005	16 Nov 2023 10:38:44	68 Victoria Av N	Terrain	2023-11-16 10:45	2023	11
9	18495595	2020	19 Nov 2023 01:02:02	68 Victoria Av N	Terrain	2023-11-19 1:12	2023	11
9	18512956	2091	21 Dec 2023 03:13:00	68 Victoria Av N	Terrain	2023-12-21 3:23	2023	12
9	18516134	2031	27 Dec 2023 03:16:00	68 Victoria Av N	Terrain	2023-12-27 3:21	2023	12
9	18521862	2019	06 Jan 2024 02:58:00	68 Victoria Av N	Terrain	2024-01-06 3:00	2024	1
9	18523038	2018	08 Jan 2024 11:38:00	68 Victoria Av N	Terrain	2024-01-08 11:48	2024	1

A4372

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
9	18526290	2013	14 Jan 2024 15:19:00	68 Victoria Av N	Terrain	2024-01-14 15:25	2024	1
9	18527013	2033	16 Jan 2024 02:39:00	68 Victoria Av N	Terrain	2024-01-16 2:45	2024	1
9	18527515	2033	17 Jan 2024 05:39:00	68 VICTORIA AV N		2024-01-17 5:48	2024	1
9	18533957	2541	30 Jan 2024 03:31:00	68 Victoria Av N	Terrain	2024-01-30 3:37	2024	1
9	18536452	2092	04 Feb 2024 02:45:00	68 Victoria Av N	Terrain	2024-02-04 2:53	2024	2
9	18538335	2033	08 Feb 2024 00:41:00	68 Victoria Av N	Terrain	2024-02-08 0:45	2024	2
9	18539387	2544	10 Feb 2024 09:58:00	68 Victoria Av N	Terrain	2024-02-10 10:04	2024	2
9	18540250	2012	12 Feb 2024 08:07:00	68 Victoria Av N	Terrain	2024-02-12 8:14	2024	2
9	18544569	2544	21 Feb 2024 03:14:00	68 Victoria Av N	Terrain	2024-02-21 3:20	2024	2
9	18545043	2092	22 Feb 2024 01:42:00	68 Victoria Av N	Terrain	2024-02-22 1:46	2024	2
9	18545043	2013	22 Feb 2024 01:42:00	68 Victoria Av N	Terrain	2024-02-22 1:49	2024	2
9	18547301	2027	26 Feb 2024 15:51:00	68 Victoria Av N	Terrain	2024-02-26 15:58	2024	2
9	18553628	2089	10 Mar 2024 06:17:00	68 Victoria Av N	Terrain	2024-03-10 6:24	2024	3
9	18561466	2022	27 Mar 2024 08:53:00	68 Victoria Av N	Terrain	2024-03-27 9:00	2024	3
9	18565475	2013	05 Apr 2024 00:07:00	68 Victoria Av N	Terrain	2024-04-05 0:19	2024	4
9	18565939	2033	05 Apr 2024 22:20:00	68 Victoria Av N	Terrain	2024-04-05 22:32	2024	4

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
9	18570158	2091	14 Apr 2024 03:04:00	68 Victoria Av N	Terrain	2024-04-14 3:14	2024	4
9	18573869	2002	21 Apr 2024 20:08:00	68 VICTORIA AV N	Recreation	2024-04-21 20:13	2024	4
9	18579814	2011	04 May 2024 03:48:00	68 Victoria Av N	Terrain	2024-05-04 3:54	2024	5
9	18580871	2012	06 May 2024 03:32:00	68 Victoria Av N	Terrain	2024-05-06 3:37	2024	5
9	18596444	2544	04 Jun 2024 19:35:00	68 Victoria Av N	Terrain	2024-06-04 19:48	2024	6
9	18596444	2004	04 Jun 2024 19:35:00	68 Victoria Av N	Terrain	2024-06-04 20:01	2024	6
9	18597750	2033	07 Jun 2024 09:47:00	68 Victoria Av N	Terrain	2024-06-07 9:55	2024	6
9	18605161	2014	20 Jun 2024 10:52:00	68 Victoria Av N	Terrain	2024-06-20 11:10	2024	6
10								
11								
12	18397895	2034	16 May 2023 13:11:50	1501 Barton St E		2023-05-16 13:17	2023	5
12	18508786	2036	13 Dec 2023 00:23:00	1501 Barton St E		2023-12-13 0:32	2023	12
12	18549776	2087	02 Mar 2024 12:41:00	1501 Barton St E		2024-03-02 12:46	2024	3
12	18565703	2021	05 Apr 2024 13:13:00	1501 Barton St E		2024-04-05 13:27	2024	4
12	18573420	2004	20 Apr 2024 22:24:00	1501 BARTON ST E	Religious Building	2024-04-20 22:32	2024	4
12	18587523	2541	19 May 2024 11:32:00	1501 Barton St E		2024-05-19 11:40	2024	5
13	18336704	2010	07 Jan 2023 13:13:30	96 Mary St	Park - Municipal	2023-01-07 13:17	2023	1

A8658

A4374

A8659

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
13	18349374	2021	03 Feb 2023 18:41:53	96 Mary St	Park - Municipal	2023-02-03 18:48	2023	2
13	18365141	2002	09 Mar 2023 10:40:11	96 Mary St	Park - Municipal	2023-03-09 10:46	2023	3
13	18372184	2092	24 Mar 2023 15:28:14	96 Mary St	Park - Municipal	2023-03-24 15:34	2023	3
13	18382709	2092	16 Apr 2023 16:19:46	96 Mary St	Park - Municipal	2023-04-16 16:29	2023	4
13	18404702	2031	30 May 2023 13:01:04	96 Mary St	Terrain	2023-05-30 13:03	2023	5
13	18407337	2021	03 Jun 2023 21:11:41	96 Mary St	Terrain	2023-06-03 21:23	2023	6
13	18409884	2006	08 Jun 2023 21:36:47	96 Mary St	Terrain	2023-06-08 21:43	2023	6
13	18439121	2092	03 Aug 2023 19:28:59	96 Mary St	Terrain	2023-08-03 19:40	2023	8
13	18453119	2022	30 Aug 2023 21:37:18	96 MARY ST		2023-08-30 21:41	2023	8
13	18454960	2092	03 Sep 2023 11:22:23	96 Mary St	Terrain	2023-09-03 11:26	2023	9
13	18469126	2027	28 Sep 2023 22:26:33	96 Mary St	Terrain	2023-09-28 22:30	2023	9
13	18476309	2022	12 Oct 2023 12:31:35	96 Mary St	Terrain	2023-10-12 12:38	2023	10
13	18480938	2033	22 Oct 2023 00:21:04	96 Mary St	Terrain	2023-10-22 0:31	2023	10
13	18487117	2091	02 Nov 2023 18:50:42	96 Mary St	Terrain	2023-11-02 18:57	2023	11
13	18493604	2093	15 Nov 2023 11:03:41	96 Mary St	Terrain	2023-11-15 11:08	2023	11
13	18497485	2090	22 Nov 2023 17:45:22	96 Mary St	Terrain	2023-11-22 18:05	2023	11

A4375

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
13	18509989	2090	15 Dec 2023 10:52:00	96 Mary St	Terrain	2023-12-15 11:07	2023	12
13	18510168	2019	15 Dec 2023 16:25:00	96 Mary St	Terrain	2023-12-15 16:34	2023	12
13	18532581	2544	27 Jan 2024 10:00:00	96 Mary St	Terrain	2024-01-27 10:03	2024	1
13	18555390	2544	14 Mar 2024 06:47:00	96 Mary St	Terrain	2024-03-14 6:52	2024	3
13	18571030	2091	15 Apr 2024 20:58:00	96 Mary St	Terrain	2024-04-15 21:06	2024	4
13	18579224	2031	02 May 2024 21:32:00	96 Mary St	Terrain	2024-05-02 21:36	2024	5
13	18587601	2011	19 May 2024 14:23:00	96 Mary St	Terrain	2024-05-19 14:28	2024	5
13	18603533	2031	17 Jun 2024 20:40:00	96 Mary St	Terrain	2024-06-17 20:43	2024	6
13	18603533	2542	17 Jun 2024 20:40:00	96 Mary St	Terrain	2024-06-17 20:46	2024	6
13	18604258	2027	18 Jun 2024 21:52:00	96 Mary St	Terrain	2024-06-18 21:58	2024	6
13	18607964	2547	25 Jun 2024 00:32:00	96 Mary St	Terrain	2024-06-25 0:45	2024	6
14								
15								
16	18404462	2027	29 May 2023 23:08:20	399 King St E	Public Places	2023-05-29 23:15	2023	5
16	18472159	2024	03 Oct 2023 19:22:16	399 King St E	Public Places	2023-10-03 19:28	2023	10
16	18483635	2006	27 Oct 2023 01:21:45	399 KING ST E		2023-10-27 1:30	2023	10
16	18484186	2022	28 Oct 2023 03:11:04	399 King St E	Public Places	2023-10-28 3:20	2023	10

A8660

A4376

A8661

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
16	18488492	2003	05 Nov 2023 10:17:29	399 King St E	Public Places	2023-11-05 10:23	2023	11
16	18488492	2022	05 Nov 2023 10:17:29	399 King St E	Public Places	2023-11-05 10:24	2023	11
17	18378200	2091	06 Apr 2023 19:47:19	111 Burlington St E	Arena	2023-04-06 19:53	2023	4
17	18389225	2005	29 Apr 2023 10:30:42	111 Burlington St E	Recreation	2023-04-29 10:43	2023	4
17	18401438	2020	23 May 2023 20:59:30	111 Burlington St E	Recreation	2023-05-23 21:06	2023	5
17	18403711	2020	28 May 2023 12:43:54	111 Burlington St E	Terrain	2023-05-28 12:55	2023	5
17	18407755	2006	04 Jun 2023 17:05:53	111 Burlington St E	Terrain	2023-06-04 17:09	2023	6
17	18433383	2013	23 Jul 2023 17:07:23	111 Burlington St E	Recreation	2023-07-23 17:13	2023	7
17	18449483	2091	23 Aug 2023 20:45:08	111 Burlington St E	Recreation	2023-08-23 20:48	2023	8
17	18456384	2092	05 Sep 2023 19:58:02	111 Burlington St E	Recreation	2023-09-05 20:06	2023	9
17	18467331	2010	25 Sep 2023 17:07:33	111 Burlington St E	Terrain	2023-09-25 17:13	2023	9
17	18470407	2009	01 Oct 2023 01:45:16	111 Burlington St E	Terrain	2023-10-01 1:52	2023	10
17	18477211	2092	14 Oct 2023 09:58:01	111 Burlington St E	Recreation	2023-10-14 10:03	2023	10
17	18478915	2006	17 Oct 2023 21:14:09	111 Burlington St E	Recreation	2023-10-17 21:23	2023	10
17	18499802	2019	27 Nov 2023 00:49:20	111 Burlington St E	Recreation	2023-11-27 0:54	2023	11
17	18594916	2019	02 Jun 2024 08:20:00	111 Burlington St E	Terrain	2024-06-02 8:26	2024	6

A4377

A8662

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
17	18597639	2026	07 Jun 2024 00:40:00	111 Burlington St E	Terrain	2024-06-07 0:44	2024	6
17	18609957	2033	28 Jun 2024 19:38:00	111 Burlington St E	Terrain	2024-06-28 19:50	2024	6
18								
19								
20	18423977	2018	05 Jul 2023 20:08:17	13 Delaware Av	Terrain	2023-07-05 20:19	2023	7
20	18476876	2013	13 Oct 2023 15:27:57	13 Delaware Av	Terrain	2023-10-13 15:33	2023	10
20	18476876	2022	13 Oct 2023 15:27:57	13 Delaware Av	Terrain	2023-10-13 15:33	2023	10
20	18581664	2019	07 May 2024 15:58:00	13 Delaware Av	Terrain	2024-05-07 16:05	2024	5
20	18581664	2381	07 May 2024 15:58:00	13 Delaware Av	Terrain	2024-05-07 16:14	2024	5
21								
22	18365613	2008	10 Mar 2023 09:01:00	Wentworth St S & Charlton Av E		2023-03-10 9:10	2023	3
22	18396950	2031	14 May 2023 13:49:00	Wentworth St S & Charlton Av E	Terrain	2023-05-14 13:56	2023	5
22	18396950	2381	14 May 2023 13:49:00	Wentworth St S & Charlton Av E	Terrain	2023-05-14 14:05	2023	5
22	18406602	2092	02 Jun 2023 17:36:00	Wentworth St S & Charlton Av E	Terrain	2023-06-02 17:41	2023	6
22	18437489	2006	31 Jul 2023 19:30:00	Wentworth St S & Charlton Av E	Terrain	2023-07-31 19:41	2023	7
22	18437489	2027	31 Jul 2023 19:30:00	Wentworth St S & Charlton Av E	Terrain	2023-07-31 19:38	2023	7
22	18437489	2383	31 Jul 2023 19:30:00	Wentworth St S & Charlton Av E	Terrain	2023-07-31 19:45	2023	7

A4378

A8663

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
22	18511538	2033	18 Dec 2023 08:32:00	Wentworth St S & Charlton Av E	Terrain	2023-12-18 8:44	2023	12
22	18556951	2006	17 Mar 2024 07:41:00	Wentworth St S & Charlton Av E	Terrain	2024-03-17 7:47	2024	3
22	18583912	2025	12 May 2024 09:48:00	Wentworth St S & Charlton Av E	Terrain	2024-05-12 9:53	2024	5
22	18596106	2031	04 Jun 2024 09:12:00	Wentworth St S & Charlton Av E	Terrain	2024-06-04 9:19	2024	6
22	18596210	2031	04 Jun 2024 12:21:00	Wentworth St S & Charlton Av E	Terrain	2024-06-04 12:27	2024	6
22	18596210	2011	04 Jun 2024 12:21:00	Wentworth St S & Charlton Av E	Terrain	2024-06-04 12:27	2024	6
22	18607439	2542	24 Jun 2024 06:25:00	Wentworth St S & Charlton Av E	Terrain	2024-06-24 6:34	2024	6
22	18607439	2023	24 Jun 2024 06:25:00	Wentworth St S & Charlton Av E	Terrain	2024-06-24 6:34	2024	6
23	18438619	2018	02 Aug 2023 20:40:00	John St N & Rebecca St		2023-08-02 20:44	2023	8
23	18414858	2010	18 Jun 2023 18:07:00	Rebecca St & John St N		2023-06-18 18:11	2023	6
23	18470495	2011	01 Oct 2023 08:12:00	Rebecca St & John St N		2023-10-01 8:16	2023	10
23	18528896	2544	19 Jan 2024 20:41:00	Rebecca St & John St N		2024-01-19 20:45	2024	1
23	18607179	2024	23 Jun 2024 17:24:00	Rebecca St & John St N		2024-06-23 17:33	2024	6
24	18460235	2031	12 Sep 2023 10:30:00	Barton St W & Tiffany St		2023-09-12 10:40	2023	9
24	18564703	2088	03 Apr 2024 10:22:00	Barton St W & Tiffany St		2024-04-03 10:29	2024	4
24	18578462	2091	01 May 2024 14:57:00	Barton St W & Tiffany St		2024-05-01 15:12	2024	5

A4379

LocationID	CallNum	UnitId	T1_CallReceived	PickupLocation	Pickup Location Type	T4_ArrivedScene	Year	Month
24	18609262	2031	27 Jun 2024 13:27:00	Barton St W & Tiffany St		2024-06-27 14:03	2024	6

A8665

This is **Exhibit "D"** referred to in the Affidavit of Wesley Loy affirmed before me at the City of Hamilton, in the Province of Ontario, on7/25/2024..... in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

Docusigned by:

Bevin Shores

75E43E7F402846F...

Commissioner for Taking Affidavits
(or as may be)
Bevin Shores (LSO No. 56161F)

A4381

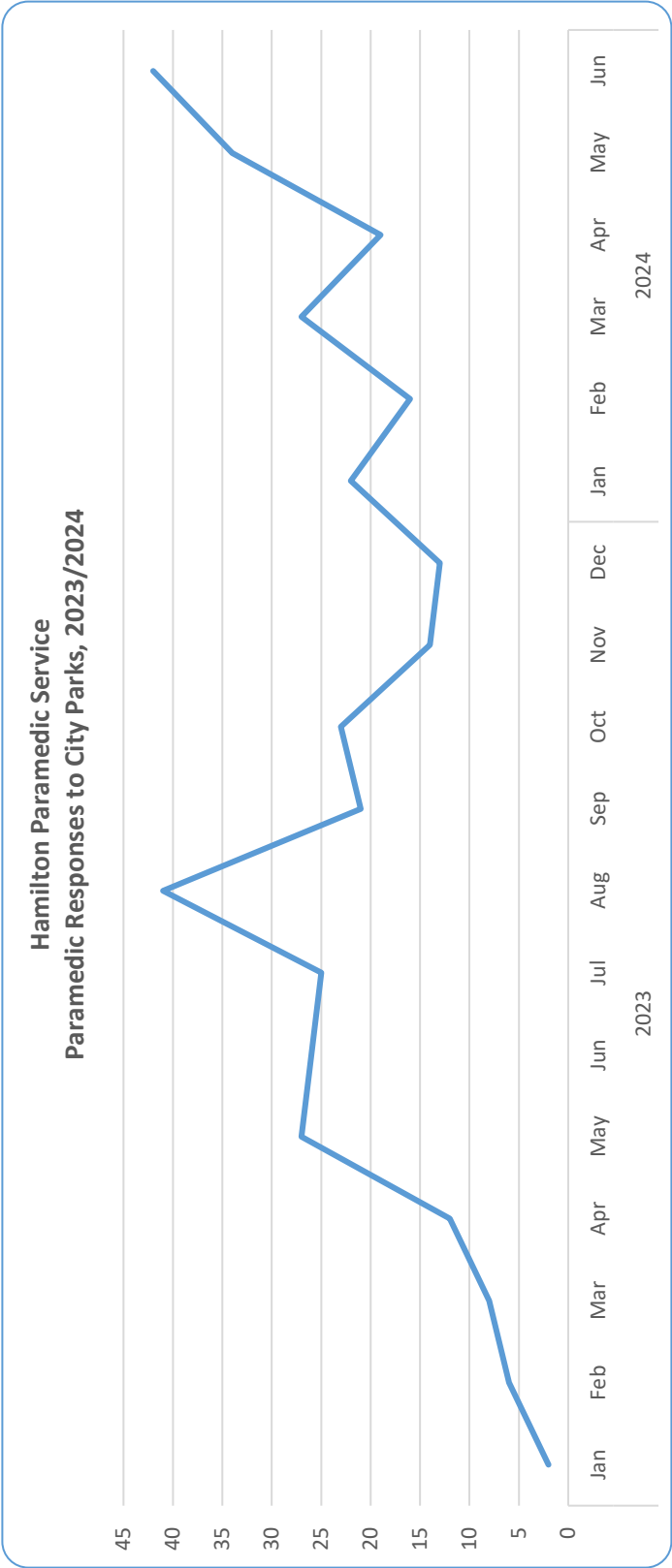
HAMILTON PARAMEDIC SERVICE
SUMMARY OF RESPONSES TO SELECTED CITY LOCATIONS,
2023/2024

Responses	2023												2024					
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
	2	6	8	12	27	26	25	41	21	23	14	13	22	16	27	19	34	42

Source: ADDS Data Warehouse

Prepared by: Wesley Loy, Data & Records Coordinator

12 Jul 2024



A8667

This is **Exhibit "E"** referred to in the Affidavit of Wesley Loy affirmed before me at the City of Hamilton, in the Province of Ontario, on7/25/2024..... in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:

Bevin Shores

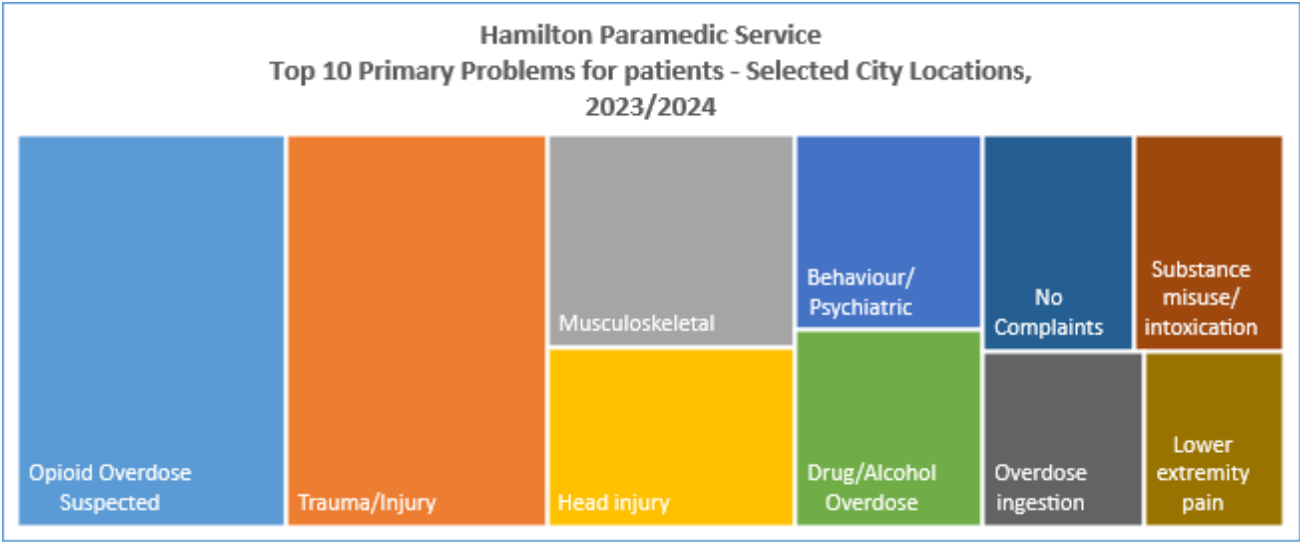
75E43E7F402846F...

Commissioner for Taking Affidavits
(or as may be)
Bevin Shores (LSO No. 56161F)

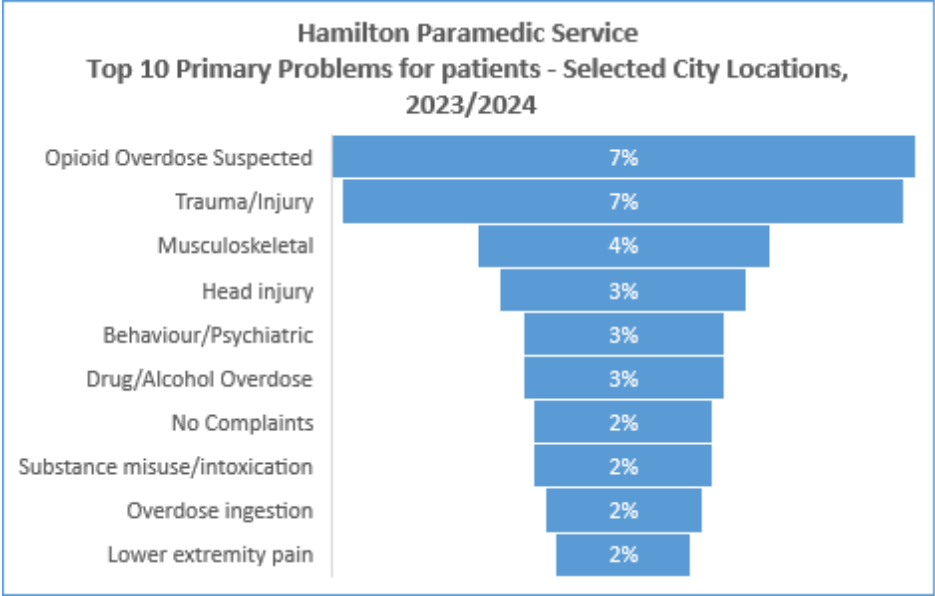
A4383

TOP 10 PRIMARY PROBLEMS - SELECTED CITY LOCATIONS,
2023/2024

TOP 10 FINAL PRIMARY PROBLEMS	% (N=378)
Opioid Overdose Suspected	7%
Trauma/Injury	7%
Musculoskeletal	4%
Head injury	3%
Behaviour/Psychiatric	3%
Drug/Alcohol Overdose	3%
No Complaints	2%
Substance misuse/intoxication	2%
Overdose ingestion	2%
Lower extremity pain	2%



A8669



A4385

A8670

This is **Exhibit "F"** referred to in the Affidavit of Wesley Loy affirmed before me at the City of Hamilton, in the Province of Ontario, on7/25/2024..... in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:

Bevin Shores

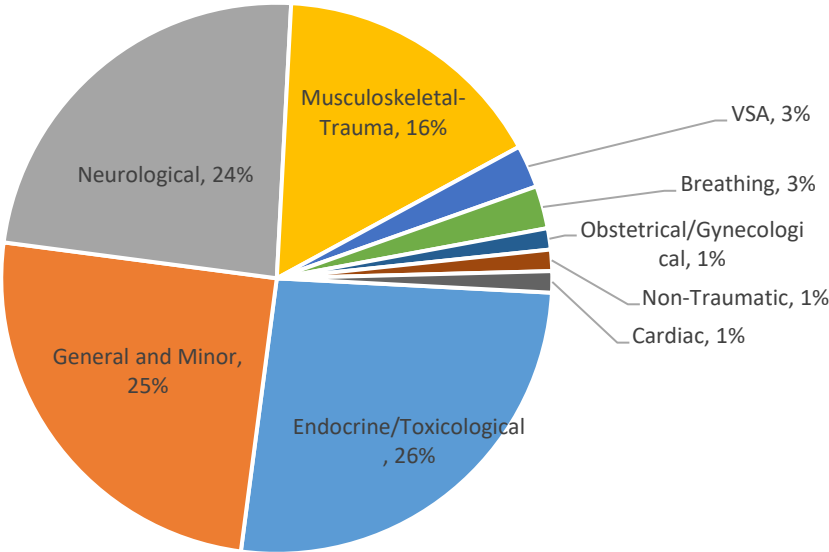
Commissioner for Taking Affidavits
(or as may be)
Bevin Shores (LSO No. 56161F)

A4386

**All Final Primary Problems by Medical Categories -
Selected City Locations, 2023/2024**

Medical Category	%
Endocrine/Toxicological	26%
General and Minor	25%
Neurological	24%
Musculoskeletal-Trauma	16%
VSA	3%
Breathing	3%
Obstetrical/Gynecological	1%
Non-Traumatic	1%
Cardiac	1%

**Hamilton Paramedic Service
All Primary Problems by Medical Categories
- Selected City Locations, 2023/2024**



Court File No. CV-21-00077187-0000	
KRISTEN HEEGSMA et al.	- and - CITY OF HAMILTON
Applicants	Respondent
ONTARIO	
SUPERIOR COURT OF JUSTICE	
PROCEEDING COMMENCED AT HAMILTON	
AFFIDAVIT OF WESLEY LOY	
AFFIRMED7/25/2024.....,	
GOWLING WLG (CANADA) LLP Barristers & Solicitors One Main Street West Hamilton, ON L8P 4Z5 Tel: 905-540-8208 Bevin Shores (LSO#56161F) Tel: 905-540-2468 bevin.shores@gowlingwlg.com Jordan Diacur (LSO#65860E) Tel: 905-540-2500 jordan.diacur@gowlingwlg.com Lawyers for the respondent File Number: H227899	

A8672

A4388

<div>1</div> <div>Court File No. CV-21-77187</div> <div>ONTARIO SUPERIOR COURT OF JUSTICE</div> <div>BETWEEN:</div> <div>KRISTEN HEEGSMa, DARRIN MARCHAND, GORD SMYTH, MARIO MUSCATO, SHAWN ARNOLD, BRADLEY CALDWELL, CHRISTINE DELOREY, GLEN GNATUK, TAYLOR GOGO-HORNER, CASSANDRA JORDAN, JULIA LAUZON, AMMY LEWIS, ASHLEY MACDONALD, COREY MONAHAN, MISTY MARSHALL, SHERRI OGDEN, JAHMAL PIERRE, LINSLEY GREAVES and PATRICK WARD</div> <div>- and -</div> <div>CITY OF HAMILTON</div> <div>Applicants Respondent</div> <div>CROSS-EXAMINATION OF WESLEY LOY, on behalf of the Respondent, on his affidavit dated July 25, 2024, held via Zoom Videoconference hosted by the offices of Nimigan Mihailovich Reporting Inc., Hamilton, Ontario, on Friday, August 16, 2024, at 1:25 p.m. EDT</div> <div>APPEARANCES:</div> <div>Sujit Choudhry for the Applicants Sharon Crowe Curtis Sell Michelle Sutherland Nnonyechi Okenwa</div> <div>Bevin Shores for the Respondent Jordan Diacur Vivian Caldas</div> <div>ALSO PRESENT:</div> <div>Jojo Johnson Articling Student</div> <div>NIMIGAN MIHAILOVICH REPORTING INC.</div>	<div>3</div> <div>Zoom Videoconference</div> <div>A8673</div> <div>1 --- Upon commencing on Friday, August 16, 2024, at</div> <div>2 1:25 p.m. EDT</div> <div>3</div> <div>4 AFFIRMED: WESLEY LOY</div> <div>5 CROSS-EXAMINATION BY MR. CHOUDHRY:</div> <div>6 1 Q. Mr. Loy, good afternoon.</div> <div>7 A. Good afternoon.</div> <div>8 2 Q. Can you hear me, sir?</div> <div>9 A. Yes.</div> <div>10 3 Q. Good.</div> <div>11 My name is Sujit Choudhry, as</div> <div>12 Ms. Shores says. I am one of the lawyers for the</div> <div>13 applicants in this case.</div> <div>14 I'm sure that you've been told what</div> <div>15 this case is. I just need to give you a bit of a</div> <div>16 sense of what this part of the case is about, if I</div> <div>17 may, before I ask you a few questions about the</div> <div>18 affidavit that you provided as evidence.</div> <div>19 A. Okay.</div> <div>20 4 Q. As you know, today I'm</div> <div>21 cross-examining you on your affidavit, which has</div> <div>22 been filed by the City in a court case regarding</div> <div>23 homeless encampments. Your affidavit and this</div> <div>24 cross-examination on the affidavit will go into</div> <div>25 evidence before the Court. So as a consequence,</div> <div>NIMIGAN MIHAILOVICH REPORTING INC.</div>
<div>2</div> <div>INDEX</div> <div>PAGE</div> <div>1 AFFIRMED: WESLEY LOY 3</div> <div>2 CROSS-EXAMINATION BY MR. CHOUDHRY 3</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8 LIST OF UNDERTAKINGS, REFUSALS, &</div> <div>9 UNDER ADVISEMENTS</div> <div>10</div> <div>11 Undertakings (U/T) found at pages:</div> <div>12 NONE</div> <div>13</div> <div>14 Refusals (REF) found at pages:</div> <div>15 NONE</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> <div>NIMIGAN MIHAILOVICH REPORTING INC.</div>	<div>4</div> <div>1 it's important that you tell the truth, and I know</div> <div>2 you've just sworn an oath to tell the truth.</div> <div>3 If you'd like me to repeat a</div> <div>4 question, please do. If you would like a moment</div> <div>5 to collect your thoughts to answer a question,</div> <div>6 please take it. We're not in a race, although we</div> <div>7 are on a bit of a clock. But we're not in a race.</div> <div>8 You may only -- as I'm sure you've</div> <div>9 been told, you may only have your affidavit and</div> <div>10 exhibits in front of you and no other material or</div> <div>11 notes. And could I just ask you to confirm that</div> <div>12 that is, in fact, the case?</div> <div>13 A. That's the case. Actually, I</div> <div>14 don't have my affidavit in front of me. I --</div> <div>15 5 Q. Okay. I'm going to put parts</div> <div>16 of it to you, sir. I don't know if you want to</div> <div>17 get it. I don't want you to be at a disadvantage</div> <div>18 if I'm asking you questions about it. Would</div> <div>19 you like --</div> <div>20 MS. SHORES: You can put it on the</div> <div>21 screen.</div> <div>22 MR. CHOUDHRY: Okay. I will</div> <div>23 certainly take him to passages in it, and I'll</div> <div>24 give him time to refresh his memory as I put it to</div> <div>25 him. Is that okay, Ms. Shores?</div> <div>A4389</div> <div>NIMIGAN MIHAILOVICH REPORTING INC.</div>

1 MS. SHORES: So do you want me to
2 have it ready to put on the screen for you?

3 MR. CHOUDHRY: I'll have it ready
4 and I'll put it on the screen.

5 **6 Q.** And if there's any parts of
6 the affidavit you want me to scroll to that I
7 haven't put to you, just tell me and I'll take you
8 to it, Mr. Loy.

9 **A. Okay.**

10 **7 Q.** Okay. And so let me just --
11 do you have any questions about those
12 instructions?

13 **A. No.**

14 **8 Q.** Okay. Thank you.

15 Okay. So let's just begin. So in
16 paragraph 1 of your affidavit, you state that you
17 are -- you were at the time the data and records
18 coordinator for the Hamilton Paramedic Service,
19 the HPS. Is that still the case?

20 **A. Yes, it is.**

21 **9 Q.** And in that role, did you have
22 access to the records that you relied on to
23 prepare this affidavit; that is, the ADRS and the
24 EPCR?

25 **A. Yes.**

NIMIGAN MIHAIOVICH REPORTING INC.

1 **10 Q.** Okay. So I'd like to take you
2 to just a few paragraphs in your affidavit. I'm
3 going to put it up on the screen, if you'll just
4 bear with me for a minute.

5 Mr. Loy, do you see your affidavit
6 there?

7 **A. Yes, I do.**

8 **11 Q.** Is it large enough for you,
9 sir, or do you want me to enlarge it?

10 **A. It's -- it's large. It's
11 okay.**

12 **12 Q.** Yeah, unfortunately, that's
13 the best I can do. Let me see -- you know what?
14 I think that will be fine for the present
15 purposes.

16 So I first would like to take you
17 to paragraph 4, and sorry for the lag here. So I
18 want to ask you a bit about paragraph 4.

19 So prior to that, I just want to
20 ask you a bit about the Ambulance Dispatching
21 Reporting System and the Electronic Patient Care
22 Records. Do those databases cover the entire
23 city?

24 **A. Yes, they do.**

25 **13 Q.** Okay. Excuse me. I'm sorry

NIMIGAN MIHAIOVICH REPORTING INC.

1 it's flashing. Would you just give me one second,
2 sir. I'm going to try to do it another way. **A8674**

3 Ms. Shores, if I can't get this
4 working here today, I might have to impose on you
5 to put up the affidavit. Just give me one second.

6 Okay. So hopefully this will be a
7 little bit better. And if not, I'll ask
8 Ms. Shores to give me a hand.

9 So this is -- in paragraph 4,
10 you've listed what you call the updated encampment
11 areas; is that correct?

12 **A. Yes.**

13 **14 Q.** Okay. Is it true that -- and
14 so I'm just scrolling down. So it's (a) through
15 (n). So that's correct; right?

16 **A. Yes.**

17 **15 Q.** Okay. And for this affidavit,
18 it's correct that you reviewed the ADRS and the
19 EPCR from January 2023 to June 30, 2024; correct?

20 **A. Yes.**

21 **16 Q.** And you reviewed those records
22 for the 14 encampment areas?

23 **A. Yes.**

24 **17 Q.** And you also reviewed those
25 records for the entire city; correct?

NIMIGAN MIHAIOVICH REPORTING INC.

1 **A. Well, I was reviewing the
2 records with respect to these areas. I'm not sure
3 what you mean with respect to the entire city.**

4 **18 Q.** Just simply, sir, that these
5 14 areas don't constitute the entirety of the city
6 of Hamilton, do they?

7 **A. No.**

8 **19 Q.** So did you review the records
9 not just for these 14 areas, or did you -- did you
10 also review them for the entire city?

11 **A. I only reviewed the records
12 for the -- these specific areas.**

13 **20 Q.** Okay. Thank you for that
14 clarification.

15 Now, sir, I would like to take you
16 to Exhibit A in your affidavit. So I'm just going
17 to scroll down. I think there's a bit of a lag
18 time. There.

19 Sir, do you see Exhibit A? Do you
20 recognize that?

21 **A. Yes.**

22 **21 Q.** Now, sir, I'm just looking at
23 this list, and I see that there are 24 different
24 areas identified here.

25 **A. Yes.**

NIMIGAN MIHAIOVICH REPORTING INC.

A4390

1 **22** Q. And so could you just help me,
2 in plain English, to understand the difference
3 between -- the relationship between the 14 updated
4 encampment areas and these 24 locations?

5 **A. Can I see back the -- the 14,**
6 **please?**

7 **23** Q. Of course. I'll just take you
8 back up. Give me one second.

9 It's (a) through (n). Can you see
10 those?

11 **A. Yes.**

12 **24** Q. Those are the 14 that you
13 describe as the 14 updated encampment areas.

14 **A. Okay.**

15 **25** Q. Can I take it back to Exhibit
16 A?

17 **A. Yes.**

18 **26** Q. Okay. So let's do that now.

19 I'd like to restate my question, if
20 I may, sir. So at paragraph 4 of your affidavit,
21 you list 14 updated encampment areas, but at
22 Exhibit A you list 24 different areas, and I just
23 would like to understand, if you could explain,
24 please, the relationship between the 14 areas
25 listed in paragraph 4 and the 24 areas you list

NIMIGAN MIHAIOVICH REPORTING INC.

1 here.

2 **A. I believe the 14 areas are**
3 **included in this list of 24, and some of the**
4 **areas -- I guess ten of them -- did not have any**
5 **new data for the period I was asked to update the**
6 **report with.**

7 **27** Q. Okay. So can I ask you a
8 clarifying question about that?

9 **A. Yes.**

10 **28** Q. So the 14 areas that you list
11 at paragraph 4 are found -- match 14 different
12 line items in Exhibit A; correct?

13 **A. They should. I can't really**
14 **check it right now, but they should, yes.**

15 **29** Q. They should.

16 And then there's an additional ten
17 areas that aren't updated encampment areas, but
18 they're on this list?

19 **A. Yes. I said 10 because 24**
20 **minus the 14; right? That's why I would say 10,**
21 **yes.**

22 **30** Q. I'm just trying to understand.

23 And so, I suppose, the data that
24 you are providing, just to help me understand, is
25 it for the 14, or is it for the 24?

NIMIGAN MIHAIOVICH REPORTING INC.

1 **A. The data I'm providing is for**
2 **the entire list. But I believe only 14 of those**
3 **had updated data for the time period up to June**
4 **30, 2024. I forget -- what was the starting time**
5 **period you mentioned?**

6 **31** Q. If I could just help you
7 there, it was from -- I believe your evidence is
8 that the time period was January 1, 2023, to July
9 31, 2024.

10 **A. Yes. Okay.**

11 **32** Q. So could you explain what you
12 mean by "no updated data"? I'm not understanding.

13 **A. Meaning there were no**
14 **responses to ten of those areas between January --**
15 **did you say 2023?**

16 **33** Q. January 1, 2023, and July 31,
17 2024.

18 **A. Yes. So there were no updated**
19 **responses, no change in numbers between the**
20 **January 2023 and June 30, 2024.**

21 **34** Q. When you say "no updated
22 responses," I just would like to understand that
23 term a bit more precisely. So what I understand
24 is that your evidence is that you looked at the --
25 at entries in these two databases and you'd, in a

NIMIGAN MIHAIOVICH REPORTING INC.

1 sense, tag them to specific parts of the city for
2 the 14 updated encampment sites.

3 Are you saying that there are ten
4 areas on this list in Exhibit A for which there
5 was no data recorded of any EMS calls during that
6 time period?

7 **A. Yes, I believe so.**

8 **35** Q. Okay. Could you please -- are
9 you able to identify, sir, which of the ten areas
10 on this exhibit there were no EMS calls for?

11 **A. Well, it would be the ten that**
12 **were left off of the -- this list of 24. I can't**
13 **see the list --**

14 **36** Q. I see.

15 **A. -- this list side by side, so**

16 --

17 **37** Q. And can I ask you a follow-up
18 question, then. So there's ten areas here on this
19 list for which there were no EMS calls. Do you
20 know if there are encampments at any of those ten
21 areas?

22 **A. No, I do not.**

23 **38** Q. You don't know.

24 But presumably, sir, because you
25 put this list -- this is not a comprehensive list

NIMIGAN MIHAIOVICH REPORTING INC.

1 of the city of Hamilton, is it?

2 **A. I don't know.**

3 **39 Q.** You don't know.

4 So did you prepare this exhibit,
5 sir?

6 **A. I did, but I was given this**
7 **list by my manager. So I do not know if it's a**
8 **comprehensive list or not.**

9 **40 Q.** So you didn't generate this
10 list yourself?

11 **A. No, I did not.**

12 **41 Q.** And so you don't know if this
13 list contains areas with encampments or not?

14 **A. No, I -- no, I do not.**

15 **42 Q.** Okay. So you don't know if
16 this list covers all the areas with encampments or
17 not in the city; correct?

18 **A. That's correct.**

19 **43 Q.** And you don't know if the list
20 in paragraph 4 contains all the areas with
21 encampments or not in the city; correct?

22 **A. Correct.**

23 **44 Q.** So you were just given a set
24 of instructions and you executed your -- you
25 engaged in data-gathering based on the information

NIMIGAN MIHAIOVICH REPORTING INC.

1 you were provided by somebody else?

2 **A. Correct.**

3 **45 Q.** And you said that was your
4 manager?

5 **A. Yes.**

6 **46 Q.** Sir, could you please, for the
7 record, give us the name and title of your
8 manager?

9 **A. Michael Sanderson, who is the**
10 **chief of the Paramedic Service.**

11 **47 Q.** Okay. So thank you for that.
12 So I guess I'd like to now take you

13 back to the affidavit, to paragraph 8. And so
14 with all those caveats about this information, I
15 want to ask you questions about the information
16 you've provided.

17 Could you confirm it's your
18 evidence that there were 378 dispatches to the
19 updated encampment areas from January to June
20 2024?

21 **A. Yes.**

22 **48 Q.** Okay. Thank you.

23 And, sir, forgive me; I misspoke
24 before. I said that the data covered January 1st
25 to July 31, 2024. That was my mistake. It

NIMIGAN MIHAIOVICH REPORTING INC.

1 covered January 1, 2023, to June 30, 2024. I'm
2 sorry to have misled you there. **A8676**

3 **A. Okay.**

4 **49 Q.** And so I just want to confirm:
5 In your affidavit, I did not see the number of
6 dispatches for any other areas in the city of
7 Hamilton; is that correct?

8 **A. That's correct.**

9 **50 Q.** Okay. I'd now like to take
10 you to paragraph 9. So here you provide evidence
11 regarding a month-by-month breakdown of dispatches
12 to the updated encampment areas, and you compared
13 on a month-to-month basis dispatches in 2023 and
14 2024; correct?

15 **A. Correct.**

16 **51 Q.** Okay. And is it true that you
17 did not engage in this analysis for any other
18 areas in the city of Hamilton?

19 **A. Correct.**

20 **52 Q.** Okay. And then I'd like to
21 now go down to paragraph 11, and this divides over
22 the page here.

23 Can you read it, sir?

24 **A. Aloud to you?**

25 **53 Q.** No, sir, sorry. Could you

NIMIGAN MIHAIOVICH REPORTING INC.

1 read it to yourself.

2 **A. Okay. Yes.**

3 **54 Q.** Okay good.

4 So in paragraph 11, is it true that
5 you provided the top three types of primary
6 problems in the updated encampment areas for the
7 period from January 2023 to June 2024?

8 **A. Yes.**

9 **55 Q.** Okay. And just so I
10 understand, is this data for the whole of 2023 or
11 just the first six months of 2023?

12 **A. For the whole of 2023,**
13 **continuously from January 2023 through to June**
14 **2024.**

15 **56 Q.** Okay. Great.

16 Just to clarify, because the
17 previous -- the reason I asked that, and I just
18 want to confirm: In paragraph 9, you did a
19 January-to-June analysis for 2023 only; correct?

20 **A. Yes.**

21 **57 Q.** Okay. And so let's go back to
22 paragraph 11. So is it the case that -- it's true
23 that I don't see here comparable statistics for
24 any other areas in Hamilton; is that right?

25 **A. That's right.** **A4392**

NIMIGAN MIHAIOVICH REPORTING INC.

1 **58** **Q.** Okay. I'd now like to take
 2 you to paragraph 12. And here in this paragraph,
 3 for the period from January 1, 2023, to June 30,
 4 2024, you take the same data and you code it by
 5 the three top medical categories; correct?

6 **A. Yes.**

7 **59** **Q.** And it's true that, in this
 8 affidavit, you don't perform the same analysis and
 9 provide the same data for any other areas in the
 10 city of Hamilton; correct?

11 **A. Correct.**

12 MR. CHOUDHRY: Okay. Sir, those
 13 conclude my questions. Thank you very much for
 14 your time, and sorry we kept you waiting.

15 THE WITNESS: Thank you.
 16 --- Whereupon the proceedings adjourned at
 17 1:43 p.m.

18
 19
 20
 21
 22
 23
 24
 25

NIMIGAN MIHAILOVICH REPORTING INC.

* * * * *

This is to hereby certify that the foregoing is a
 true and accurate transcript of WESLEY LOY to the
 best of my skill and ability.



 Kristy Fulton
 Court Reporter

NIMIGAN MIHAILOVICH REPORTING INC.

A8677

A4393

Court File No. CV-21-00077187-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

KRISTEN HEEGSMA, DARRIN MARCHAND, GORD SMYTH, MARIO
MUSCATO, SHAWN ARNOLD, BRADLEY CALDWELL, CHRISTINE
DELOREY, GLEN GNATUK, TAYLOR GOGO-HORNER, CASSANDRA
JORDAN, JULIA LAUZON, AMMY LEWIS, ASHLEY MACDONALD,
COREY MONAHAN, MISTY MARSHALL, SHERRI OGDEN, JAHMAL
PIERRE, LINSLEY GREAVES and PATRICK WARD

Applicants

and

CITY OF HAMILTON

Respondent

APPLICATION UNDER 14.05 OF THE *RULES OF CIVIL PROCEDURE*

AFFIDAVIT OF CORY MANNING

I, Cory Manning, of the City of Hamilton, in the Province of Ontario, AFFIRM:

1. I am an employee of the City Hamilton as such I have knowledge of the matters set out in my affidavit. Where I rely on the information of others, I state the source of that information and verily believe it to be true.

Roles and Duties

2. Since June 2024, I have held the title of Superintendent of Parks District North of the Hamilton Parks and Cemeteries Section for the City of Hamilton. I have been employed with the City of Hamilton for approximately eighteen years in various roles within the Parks and Cemeteries Section or its predecessor. In terms of my recent roles, in approximately September 2021 I became the Superintendent of Parks District West. In May 2022 I also, as an added responsibility, headed the encampment team for the Parks and Cemeteries Section. I have continued to head the encampment team while continuing on as Superintendent of Parks District North. In each of these roles I report to Kara Bunn.

3. The encampment team is, generally, tasked with cleanup of encampment sites; whether cleaning sites that have been vacated or abandoned; or assisting with cleanliness and waste removal for sites that are still active. In May 2022, cleanup was performed by contractors during daytime hours, and Parks North staff after their normal hours, as additional duties. The supervisor, Joe Wade, oversaw this team. My role involved, primarily, managing complaints, along with Mr. Wade; attending meetings three times per week regarding coordinating cleanup; directing deployment of cleanups; and liaising with the Housing Focused Street Outreach Team ("HFSOT"), Housing, Municipal Law Enforcement ("MLE"), and Hamilton Police Service, as necessary, regarding new sites.

4. Following the enactment of the 2023 Encampment Protocol, Council approved one full-time supervisor and three full-time staff members within Parks solely dedicated to

-3-

encampment cleanup. As the head of the encampment team, my role remained essentially the same as described in the paragraph above.

5. I confirm that the “Standard Operating Procedure” referenced in the Second Supplementary Affidavit of Steve Hasselman directs how cleanup is performed, but does not direct when cleanup is performed.

6. The encampment team performs “regular cleanup” of known encampment sites on a routine basis, to assist with keeping existing encampments clean. This includes supplying encampment residents with garbage bags or asking them to pile their garbage or discarded items in a certain area for collection. We only take items that encampment residents have specifically indicated are garbage. The encampment team also performs cleanup in accordance with the 2023 Encampment Protocol, in accordance with the steps dictated in the Protocol. Encampment team members will also accompany Parks North staff to pre-engage with encampment residents (to give them advance notice) before staff perform park maintenance activity such as grass cutting.

7. Attached hereto as [Exhibit “A”](#) is a spreadsheet summarizing the daily cleanup at encampments from February 2023 through February 2024. Attached hereto as [Exhibit “B”](#) is a spreadsheet summarizing the daily cleanup at encampments from March 2024 to the first week of July, 2024.

Observations of Parks and Encampments

8. The Parks West district includes Ancaster, Flamborough and Dundas. I have observed very few encampments in this area and no significant issues relating to encampments in this area.

9. As current superintendent of Parks North, I observe that approximately 90-95% of encampments in the City appear to be located within the Parks North district.

10. Given my role as head of the encampments team, a large part of my day and my workload involves dealing with encampments: either responding to complaints regarding encampments or coordinating staff to respond to these complaints. I have reviewed the complaints appended to the Second Supplementary Affidavit of Steve Hasselman. I am aware of these types of complaints, which are the same as or similar to complaints that I have received and continue to receive working on the encampments team for the Parks and Cemeteries Section.

11. I and my staff make concerted efforts to develop and maintain positive relationships with the encamped residents at parks. We emphasize that we are not law enforcement and are not interacting with them in an enforcement capacity. I find that my staff and I generally enjoy a good rapport with people living in encampments.

12. I have observed that encampments are becoming more entrenched or permanent because they are permitted by the 2023 Encampment Protocol to remain in place longer. People living in encampments are adding to their spaces as they live there longer and become established. Many of them express that they see their encampment site as their

possession. Public complaints to Parks staff are also increasing along with the increase in the number of encampments and their perceived entrenchment.

AFFIRMED by Cory Manning at the City of Hamilton, in the Province of Ontario, before me at the City of Kitchener, in the Province of Ontario on July 30, 2024 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:
Vivian Caldas
ABBCB4C93B2B427...

Commissioner for Taking Affidavits
(or as may be)

VIVIAN CALDAS (LSO No. 86862V)

DocuSigned by:
Cory Manning
195D4754DBC41A...

CORY MANNING

This is **Exhibit "A"** referred to in the Affidavit of Cory Manning affirmed before me at the City of Kitchener, in the Province of Ontario, on July 30, 2024 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:

Vivian Caldas

ABBCB4C93B2B427...

Commissioner for Taking Affidavits
(or as may be)
Vivian Caldas (LSO No. 86862V)

FEBRUARY ENCAMPMENT CLEANUPS

Feb.13th York Parkette - Dimitri - M.Wilson Complaint - PN STAFF - (1)
Feb.15th Shamrock Park/Gage Park 2 of 5 - PN STAFF - (2,3,4)
Feb.16th Whitehern/Bishops/Gore - PN PTAFF - (5,6,7)
Feb.21st Whitehern/Gore - PN PTAFF - (8,9)
Feb.22nd Hillcrest/Woodlands - STAFF - (10,11)
Feb.24th Jackson Park - PN STAFF - (12)

MARCH ENCAMPMENT CLEAN UPS

Mar 1st Jackson Park - STAFF - (1)
 Mar 2nd Gore Park/(Phil Arceneaux)/Whitehern/Bayfront/Gage Park 4th of 5) - PN STAFF - (2,3,4,5)
 Mar 3rd Woodlands - STAFF (6)
 Mar 7th Gore Park/MacNab Tunnel - Hurst St./Jackie Washington/Gage Park 5th of 5) - PN STAFF - (7,8,9,10)
 Mar 8th Jackie Washington/York St.(City Centre)/McLaren/Woodlands - PN STAFF - (11,12,13,14)
 Mar 14th Woodlands/JC BEEMER - STAFF (15,16)
 Mar 16th York Parkette/Vine/City Centre/Whitehern - PN STAFF - (17,18,19,20)
 Mar 20th City Centre/Shamrock/Whitehern - PN STAFF - (21,22,23)
 Mar 24th Park & Vine/Mclaren/Whitehern - PN STAFF - (24,25,26)
 Mar 28th MacNab St/Whitehern/Shamrock/West 5th/Province St - PN STAFF - (27,28,29,30,31)
 Mar 30th MacNab St/Whitehern/West 5th/York Parkette - PN STAFF - (32,33,34,35)
 Mar 31st West 5th - STAFF - (36)

APRIL ENCAMPMENT CLEANUPS

Apr 3rd	West 5th/Vine & Park - PN STAFF - (1,2)
Apr 4th	Vine & Park/Whitehern - STAFF - (3,4)
Apr 6th	Scenic Dr/Stonechurch & Upper Paradise - STAFF - (5,6)
Apr 7th	Cathedral Dog Park - STAFF - (7)
Apr 12th	York Parkette/McLaren/Central/Woodlands/Whitehern - PN STAFF - (8,9,10,11)
Apr 14th	Bayfront/Vine & Park/Gage Park/Whitehern - PN STAFF - (12,13,14,15)
Apr 18th	Lynwood/Vine & Park/Whitehern/Century Park - PN STAFF - (17,18,19)
Apr 19th	Whitehern/West 5th/Vine & Park - STAFF - (20,21,22)
Apr 20th	Corktown/Victoria/Vine & Park - STAFF - (23,24,25)
Apr 21st	Redhill Valley - 2 Locations/Victoria - PN STAFF - (26,27,28)
Apr 25th	James St.Bridge/LifeSaver/Whitehern-City Hall - PN STAFF - (29,30,31)
Apr 27th	Summers Lane/Theatre Aquarius - PN STAFF - (32,33)
Apr 28th	Whitehern/West 5th/Vine & Park - STAFF - (34,35,36)

MAY ENCAMPMENT CLEANUPS

May 1st York Parkette/McLaren/Woodlands/Whitehern/JC Beemer/Park & Vine - PN STAFF (1,2,3,4,5,6)
 May 2nd Cathedral Dog/Road Allowance Main St W - PN STAFF (7,8)
 May 4th Whitehern/Woodlands/Sanitorium - PN STAFF (9,10,11)
 May 8th York Parkette/Shamrock/Keddy Trail 3 Locations/Birmingham - PN STAFF (12,13,14,15,16,17)
 May 9th Bow Valley - PE STAFF (18,19,20,21,22,23)
 May 11th Whitehern/Woodlands - PN STAFF (24,25)
 May 12th Whitehern - PN STAFF (26)
 May 15th Whitehern/Birch/JC Beemer - PN STAFF (27,28,29)
 May 17th York Parkette/Shamrock/Trail(455 Charlton)/Vine/Lifesaver/Woodlands/Birch - PN STAFF (30,31,32,33,34,35,36)
 May 19th Whitehern/Victoria Park/McLaren/Vine & Park - PN STAFF (37,38,39,40)
 May 23rd Whitehern/John & Rebecca/Ferguson Station - PN STAFF (41,42,43)
 May 25th Whitehern/York Parkette/Shamrock/Woodlands - PN STAFF (44,45,46,47)
 May 26th Whitehern/Ferguson Station/Woodlands/Pier 4 Lot/St.Joseph's - PN STAFF (48,49,50,51,52)
 May 29th Whitehern/Woodlands/ - PN STAFF (53,54)
 May 30th Whithern/Park and Vine/Ferguson Station/Woodlands - PN STAFF (55,56,57,58)

JUNE ENCAMPMENT CLEANUPS

June 1st York Parkette/Whitehern/Ferguson Station - PN STAFF - (1,2,3)
 June 2nd MacNab/Whitehern/Ferguson Station - PN STAFF - (4,5,6)
 June 5th Whitehern - PN STAFF - (7)
 June 6th Whitehern/Woodlands/JC Beemer - PN STAFF - (8,9,10)
 June 7th Whitehern - PN STAFF - (11)
 June 8th Whitehern - PN STAFF - (12)
 June 9th Whitehern/Woodlands/JC Beemer - PN STAFF - (13,14,15)
 June 12th Whitehern/Woodlands/Ferguson RA/Buchanan - PN STAFF - (16,17,18,19)
 June 13th Whitehern/Mountain Drive Park - PN STAFF - (20,21)
 June 14th Whitehern/JC Beemer/Woodlands - PN STAFF - (22,23,24)
 June 15th Birmingham/Dundurn Park/Whitehern/Central Park - PN STAFF - (25,26,27,28)
 June 19th Whitehern/Woodlands/Jackie Washington - PN STAFF - (29,30,31)
 June 20th Whitehern/St.Joe's/HunterParkette/Birch Dog/Shamrock/Myrtle - PN STAFF - (32,33,34,35,36,37)
 June 21st Whitehern/Woodlands/St.Joe's/Central - PN STAFF - (38,39,40,41)
 June 22nd Whitehern/Ferguson Station/Central - PN STAFF - (42,43,44)
 June 23rd Whitehern/Woodlands/St.Joe's - PN STAFF - (45,46,47)
 June 26th Whitehern/Woodlands/Lawrence Rd & Keniworth/Bishops - PN STAFF - (48,49,50,51)
 June 27th Whitehern/Woodlands/JC Beemer - PN STAFF - (52,53,54)
 June 28th Whitehern/Woodlands/JC Beemer/Peace Gardens/Central/281 Cannon/Century Park/York - PN STAFF - (55,56,57,58,59,60,61,62)
 June 29th Whitehern/Woodlands-PN STAFF - (63,64)
 June 30th Whitehern/Woodlands/JC Beemer/Central/Victoria - PN STAFF - (65,66,67,68,69,70,71)

JULY ENCAMPMENT CLEANUP TOTALS

July 4th	Woodlands/Whitehern/Central/Lifesaver/FergusonStation - PN STAFF (1,2,3,4,5)
July 6th	MacNab/Whitehern/City Hall Park/Peace Gardens/Woodlands/Myrtle/JC Beemer/Central/Lifesaver - PN STAFF (6,7,8,9,10,11,12,13,14)
July 11th	Whitehern/MacNab/Woodlands/King St & Gailmont/Rainbow/RedHillx3/Strachanx3/Gore Park/York/Wellington - PN STAFF (15,16,17,18,19,20,21,22,23,24,25,26,27,28)
July 13th	Whitehern/MacNab/Woodlands/Central/Carter/Keddy Trail/Wellington Square/Jackie Washington/Highland Gardens/Caroline - PN STAFF (29,30,31,32,33,34,35,36,37,38)
July 17th	Woodlands/Whitehern/MacNab/Stachan/Central/Park&Vine - PN STAFF (39,40,41,42,43,44,45)
July 18th	Whitehern/MacNab/JC Beemer/JackieWashington/York&Ray - PN STAFF (46,47,48,49,50)
July 20th	Centenial RA/Woodlands/JC Beemer/Central - PN STAFF (51,52,53,54)
July 24th	Woodlands/MacNab/Whitehern/Wellington SQ/Central/Woodlands/Jackie Washington/Strachan/Bridgeworks - PN STAFF (55,56,57,58,59,60,61,62,63)
July 26th	TB McQueston/Ferguson Station/Wellington SQ - PN STAFF (64,65,66)
July 27th	Ridge St Pathway/Jackie Washington/Ferguson Station/Wellington SQ/Woodlands/Whitehern/MacNab/Central/Durand/Strachan - PN STAFF (67,68,69,70,71,72,73,74,75,76)
July 28th	231 Feruson/Wellington SQ/MacNab/JC Beemer - PN STAFF (77,78,79,80)
July 31st	Woodlands/Central Park/JC Beemer/Ferguson Station/MacNabb/Whitehern - PN STAFF (81,82,83,84,85,86)

AUGUST ENCAMPMENT CLEANUP TOTALS

Aug 1st Golf Links & Stonechurch/JC Beemer/Whitehern/MacNab/Woodlands - PN STAFF (1,2,3,4,5)
 Aug 3rd Woodlands/Strachan/LifeSaver/Central/Jackie Washington/Peace Gardens - PN STAFF (6,7,8,9,10,11)
 Aug 4th 2574 King St.E - PE STAFF (12)
 Aug 9th Woodlands/Strachan/Central/Jackie Washington/Whitehern/MacNab/Peace Gardens/JC Beemer/Jackson - PN STAFF (13,14,15,16,17,18,19,20,21)
 Aug 10th Woodlands/Whitehern/MacNab/JC Beemer - PN STAFF (22,23,24,25)
 Aug 11th Woodlands/Ferguson Station/Beasley/LifeSaver - PN STAFF (26,27,28,29)
 Aug 14th Woodlands/JC Beemer/Central/Strachan/Bridgeworks/Beasley/MacNab/Whitehern/Peace Memorial/Ferguson Station/Jackie Washington - PN STAFF (30,31,32,33,34,35,36,37,38,39,40)
 Aug 15th Stonechurch & Golf Links/Woodlands/J.Washington/Strachan/Central/JC Beemer/MacNab/Whitehern/Peace Gardens/Bridgeworks/Beasley - PN STAFF (41-53)
 Aug 16th Ferguson Station/Peace Gardens/Gage Park - PN STAFF (54,55,56)
 Aug 17th Woodlands/JC Beemer/Central/Strachan/Radial/York & Queen/MacNab/Whitehern/Peace Memorial/Ferguson Station/Jackie Washington/Central - PN STAFF (57-68)
 Aug 21st Optimist Park/MacNab/Whitehern/Peace Gardens/Ferguson Station/Woodlands/Jackie Washington/Strachan/Central - PN STAFF (67,68,69,70,71,72,73,74,75)
 Aug 28th Whitehern/MacNab/Ferguson Station/Woodlands/Jackie Washington/Strachan/Central/Caroline - PN STAFF (76,77,78,89,80,81,82,83)
 Aug 30th JC Beemer/Whitehern/MacNab - PN STAFF (84,85,86)
 Aug 31st Whitehern/MacNab/Ferguson Station/Woodlands/Jackie Washington/Strachan/Central/Caroline - PN STAFF (87,88,89,90,91,92,93,94)

SEPTEMBER ENCAMPMENT CLEANUP TOTALS

Sept 1st Whithern/MacNab/Woodlands/JC Beemer - PN STAFF (1,2,3,4)
 Sept 5th Ferguson Station/Whitehern/MacNab - PN STAFF (5,6,7)
 Sept 6th Woodlands - FIRST RESPONSE/PN STAFF (8)
 Sept 7th Jackson/Hill St/Shamrock/Powell/Barton & Centennial/William Connell - FIRST RESPONSE (9,10,11,12,13,14,15)
 Sept 8th Durand Park/Birge & Victoria - FIRST RESPONSE (16,17)
 Sept 10th Strachan-Death - FIRST RESPONSE (LIZ PELT) -(18)
 Sept 11th Scenic Parkette/Strachan/Jackie Washington/JC Beemer/Century/Woodlands/Whitehern/MacNab - PN STAFF (19,20,21,22,23,24,25,26,27)
 Sept 12th Mahoney/Carter - FIRST RESPONSE - (28,29)
 Sept 13th Victoria & Birge/Sam Manson/Hillcrest/Myrtle/Wolverton/Victoria - FIRST RESPONSE - (30,31,32,33,34,35)
 Sept 14th West 5th/JC Beemer/Woodlands/Simcoe Lot/Ferrie Lot/Battlefield Park - FIRST RESPONSE - (36,37,38,39,40,41)
 Sept 18th Scenic Parkette/Strachan/Jackie Washington/JC Beemer/Hunter & Park/Woodlands/Whitehern/MacNab/Bridgeworks/Powell/Central - PN STAFF (42,43,44,45,46,47,48,49,50,51,52)
 Sept 19th Powell Hydro/Hill St/Maclaren/Shamrock North/Whitehern - PW STAFF (53,54,55,56,57)
 Sept 20th 79 & 87 Ferrie - Bayfront/358 Talbot - Redhill Barton/Carter - PW STAFF (58,59,60)
 Sept 21st Peace Gardens/Whitehern/MacNab/Wellington Square - PW STAFF (61,62,63,64)
 Sept 25th Victoria/Whitehern/MacNab/Strachan/Jackie Washington/Nash & Queenston/St.Helens Dr. - PW STAFF (65,66,67,68,69,70,71)
 Sept 26th Whitehern/MacNab/Strachan/Central - PW STAFF (72,73,74,75)
 Sept 27th Central/JC Beemer/Beasley - PW STAFF & FIRST RESPONSE (76,77,78)
 Sept 28th Jackson Park/Birge Park/Victoria - PW STAFF & FIRST RESPONSE (79,80,81)
 Sept 29th Whitehern/MacNab/Peace Gardens - PW STAFF & FIRST RESPONSE (82,83,84)
 Sept.30th Whitehern/MacNab/Peace Gardens - PW STAFF (85,86,87)

OCTOBER ENCAMPMENT CLEAN UP TOTALS

Oct.2nd	Central/Whitehern/MacNab/Strachan/Jackie Washington/JC Beemer/Wellington Square - PW STAFF (1,2,3,4,5,6,7)
Oct.3rd	Strachan/Shamrock/Whitehern/Victoria/Park&Vine - PW STAFF (8,9,10,11,12)
Oct 4th	James St/Browns/Radial/Strachan - PW STAFF (13,14,15,16)
Oct 5th	Strachan/Victoria/Hillcrest/Birch Parkette - PW STAFF (17,18,19,20)
Oct 6th	Jackson St./Hunter St./MacNab - PW STAFF (21,22,23)
Oct 10th	Strachan/Jackie Washington/Simcoe Lot/Birge/JC Beemer - PW STAFF (24,25,26,27,28)
Oct 11th	Stachan/Bayfront/JC Beemer/Ferguson Station - PW STAFF (29,30,31,32)
Oct 12th	Maplewood/Mountain Dr/Ferguson Station/Beasley - PW STAFF (33,34,35,36)
Oct 13th	Strachan/Bayfront/Pier 4/Ferguson Station/Woodlands/Dundurn - PW STAFF (37,38,39,40,41,42)
Oct 16th	Strachan/Bayfront/Dundurn3x/Ferguson Station - PW STAFF (43,44,45,46,47,48)
Oct 17th	Strachan/Gore/69 Century/Smith Knoll - PW STAFF (49,50,51,52)
Oct 18th	Macassa YC/Strachan - PW STAFF (53,54)
Oct 19th	JC Beemer/Olympic/Strachan - PW STAFF (55,56,57)
Oct 20th	Jackson St. & MacNab/Wellington Square/Brueville/Montgomery/North Central/Strachan - PW STAFF (58,59,60,61,62,63)
Oct 23rd	Strachan/Jackie Washington/Wellington Square/Century Park/Brueville Nature X 2 - PW STAFF (64,65,66,67,68,69)
Oct 24th	Victoria/Veterans/Shamrock/Wentworth Stairs/JC Beemer - PW STAFF (70,71,72,73,74)
Oct 25th	Montgomery/Keniworth Parkette/Fairfield/Powell/Woodlands/Sam Lawrence East/ -PW STAFF (75,76,77,78,79,80)
Oct 26th	Jackie Washington 2x/Woodlands/JC Beemer/Pipeline 2x - PW STAFF (81,82,83,84,85,86)
Oct 27th	Bayfront/Radial Trail 4x/Gage Park/Woodlands - PW STAFF (87,88,89,90,91,92,93)
Oct 30th	Bayfront/Jackie Washington 3x/Woodlands/JC Beemer/Wellington Sq - PW STAFF (94,95,96,97,98,99,100)
Oct 31st	Bayfront/Strachan/MacNab/City Hall/Jackie Washington - PW STAFF (101,102,103,104,105)

NOVEMBER ENCAMPMENT CLEAN UP TOTALS

Nov 1st Bayfront/Bridgeworks/Jackie Washingtonx3/Wellington Square/JC Beemer/Caroline & Barton/Bridgeworks - PW STAFF (1,2,3,4,5,6,7,8,9)
 Nov 2nd Bishops/Bridgeworks/Charltonx3/Peace Garden/McLaren - PW STAFF (10,11,12,13,14,15,16)
 Nov 3rd Parkdale/Caroline & Barton/Peace Gardens/Bayfront/MacNab - PW STAFF (17,18,19,20,21)
 Nov 6th Bayfront/Jackie Washingtonx3/Wellington Square/JC Beemer/Simcoe Lot/Ferrie Lot/Peace Gardens/MacNab - PW STAFF (22,23,24,25,26,27,28,29,30,31)
 Nov 7th Bayfront/Jackie Washington x3/MacNab/Peace Gardens - PW STAFF (32,33,34,35,36,37)
 Nov 8th Woodlands/JC Beemer/Wellington Square/Wentworth Stairs/Radial Trailx4 - PW STAFF (38,39,40,41,42,43,44,45)
 Nov 9th Stroud/JC Beemer/Bayfront/Peace Garden - PW STAFF (46,47,48,49)
 Nov 10th JC Beemer/Woodlands/Montgomery/Peace Gardens - PW STAFF (50,51,52,53)
 Nov 12th Wellington & Hunter - PW STAFF (54)
 Nov 13th Bayfront/Jackie Washingtonx3/Wellington Square/JC Beemer/Simcoe Lot/Ferrie Lot/Peace Gardens/Woodlands/Wellington & Hunter- PW STAFF (55,56,57,58,59,60,61,62,63,64,65)
 Nov 14th Peace Memorial/Eastwood/Montgomery/Fairfield/JC Beemer/Wellington Square - PW STAFF (66,67,68,69,70,71)
 Nov 15th Bayfront/Jackie Washingtonx3/Woodlands/Montgomery/Wellington Square/Mountain Drive - PW STAFF (72,73,74,75,76,77,78,79)
 Nov 16th Jackie Washingtonx3/Woodlands/Wellington Square/Park & Vine/Young St. - PW STAFF (80,81,82,84,85,86,87)
 Nov 17th Wellington Square/Jackie Washingtonx3/Stirton Tot Lot/Century Park/Century Parkette/Young St./MacNab St. - PW STAFF (88,89,90,91,92,93,94,95,96)
 Nov 20th Bayfront/Jackie Washingtonx3/Wellington Square/JC Beemer/Montgomery/Peace Garden - PW STAFF (97,98,99,100,101,102,103,104)
 Nov 21st Young St/Woodlands/MacNab/Roxborough/Comet St. - PW STAFF (105,106,107,108,109)
 Nov 22nd Bayfront/Jackie Washingtonx3/Eastwood/Wellington Square/Montgomery/JC Beemer - PW STAFF (110,111,112,113,114,115,116,117)
 Nov 23rd JC Beemer/Leaside/Woodlands/Montgomery/Fairfield/Wellington Square/Wellington & Hunter/Mahoney/Woodlands/Jackie Washington -PW STAFF(118,119,120,121,122,123,124,125,126,127)
 Nov 24th Jackie Washington/JC Beemer/Simcoe/Ferrie/Myrtle - PW STAFF (128,129,130,131,132)
 Nov 27th Bayfront/Jackie Washingtonx3/Simcoe/Ferrie/Wellington Tracks/Wellington Square/Montgomery/Fairfield/JC Beemer/West 5th - (133,134,135,136,137,138,139,140,141,142,143,144
 Nov 28th Gore/JC Beemer/Liberty & Grange - PW STAFF - (145,146,147)
 Nov 29th Wellington Square/JC Beemer/Montgomery/Fairfield/Kenilworth/Bayfront/Jackie Washington PW STAFF (148,149,150,151,152,153,154
 Nov30th Young St - Community Garden/Jackie Washington/Gore Park - PW STAFF (155,156,157)

DECEMBER ENCAMPMENT CLEAN UP TOTALS

Dec 1st Jackie Washingtonx3/Wellington Square/JC Beemer/Montgomery/Fairfield - PW STAFF - (1,2,3,4,5,6,7)
Dec 4th Bayfront/Jackie Washingtonx3/JC Beemer/Montgomery/Fairfield - PW STAFF (8,9,10,11,12,13,14)
Dec 5th Bayfront/Eastwood/Woodlands/Wellington Square/JC Beemer/Montgomery/Fairfield - PW STAFF (15,16,17,18,19,20,21)
Dec 6th Woodlands/MacNab/Hunter/Jackson/JC Beemer/Bayfront - PW STAFF (22,23,24,25,26,27)
Dec 7th Lawrence Rd & Kenilworth/Hillcrestx4/Wellington Square - PW STAFF (28,29,30,31,32,32)
Dec 8th Bayfront/Barton & Tiffany/Mountain Drive Park - PW STAFF (33,34,35)
Dec 11th Bayfront/Jackie Washingtonx3/JC Beemer/Montgomery/Fairfield/Central Memorial/Wellington SQ/Simcoe/Ferrie - PW STAFF (36,37,38,39,40,41,42,43,44,45,46)
Dec 12th Kenilworth/MacNab & Hunter/JC Beemer/Woodlands/Fairfield/Mountain Drive/Park St./Jackie Washington - PW STAFF (47,48,49,50,51,52,53,54)
Dec 13th Wellington Square/Bayfront/Barton/Brampton - PW STAFF (55,56,57,58)
Dec 14th Wellington Square/Bayfront/Dundurn/Ferrie/Simcoe/Sam Monson/Mountain Drive - PW STAFF (59,60,61,62,63,64,65)
Dec 15th Bayfront/Brampton - PW (66,67)
Dec 18th Bayfront/Jackie Washingtonx3/Wellington Square/JC Beemer/Gage Park Bandshell - PW STAFF (68,69,70,71,72,73,74)
Dec 19th 34 Ford/Liberty & Grange/JC Beemer/Warden/Wellington Square/Bayfront/Jackie Washington x3 - PW STAFF (75,76,77,78,79,80,81,82,83)
Dec 20th JC Beemer/Carter/208 Mountain Dr./Commonwealth Sq/Beasley/Kenilworth Parkette/Bayfront/Wellington Square - PW STAFF (84,85,86,87,88,89,90,91)
Dec 21st Bayfront/Queen & York/Main & Longwood/Kenilworth Parkette/Commonwealth Square - PW STAFF (92,93,94,95,96)
Dec 22nd Bayfront/Eastwood/Hutch's Lot/JC Beemer/Cliffview/Beasley - PW STAFF (97,98,99,100,101,102)
Dec 27th Bayfront/JC Beemer/Woodlands/Central/MacNab - PW STAFF (103,104,105,106,107)
Dec 28th Jackie Washingtonx3/Woodlands/Fairfield - PW STAFF (108,109,110,111,112)
Dec 29th Bayfrontx2/Jackie Washington/Wellington Square/Woodlands - PW STAFF (113,114,115,116,117)

JANUARY ENCAMPMENT CLEANUP TOTALS

Jan 2nd	Fairfield/Montgomery/Kenilworth Parkette/Woodlands/JC Beemer/Wellington Square/Stirton Tot Lot - PW STAFF (1,2,3,4,5,6,7)
Jan 3rd	Jackie Washington3/Simcoe Lot/Ferrie Lot/Wellington St/Wellington & Hunter - PW STAFF & FIRST RESPONSE (8,9,10,11,12,13,14)
Jan 4th	Bayfront/JC Beemer/Shamrock/Corktown/Hunter & MacNabx2 - PW STAFF (15,16,17,18,19,20)
Jan 5th	77 James/Mountain Drive/JC Beemer/Lucy Day/Brampton - PW STAFF (21,22,23,24,25)
Jan 8th	Bayfront/Jackie Washington3/Simcoe/Ferrie/Wellington Square/Wellington Square/JC Beemer/Beasley/Wolverton - PW STAFF (26,27,28,29,30,31,32,33,34,35)
Jan 9th	Mountain Dr/Fairfield/Wellington & Hunter/Jackie Washington3/Brampton - PW STAFF (36,37,38,39,40,41,42)
Jan 10th	JC Beemer/Montgomery/Mahoney/North Central/Wellington Square/Woodlands/Powell/Park & Vine - PW STAFF (43,44,45,46,47,48,49,50)
Jan 11th	Brampton/Mahoney/Montgomery/Wellington Square/Clairemont/Ferrie - PW STAFF (51,52,53,54,55,56)
Jan 12th	Wellington Square/Clairemont Parkette/Wellington Square/Hunter/Bayfront/Pinky Lewis/Powell - PW STAFF (57,58,59,60,61,62)
Jan 15th	Bayfront/Jackie Washington/Wellington Square/JC Beemer/Montgomery/Wellington & Hunter/Rail Trail - PW STAFF (63,64,65,66,67,68,69)
Jan 16th	Wellington Square/Bayfront/Wellington & Hunter/Jackie Washington/JC Beemer/Mountain Drive - PW STAFF(70,71,72,73,74,75)
Jan 17th	Delta/Brampton/Birmingham/Woodlands/Bayfront/JC Beemer/Strachan - PW STAFF(76,77,78,79,80,81)
Jan 18th	Bayfront/Jackie Washington/Mohawk Sports/Gage Park - PW STAFF (82,83,84,85)
Jan 19th	Bayfront/Strachen/Cathedral Dog/Durand/Jackie Washington - PW STAFF (86,87,88,89,90)
Jan 22nd	Bayfront/Stachen/JC Beemer/Jackie Washington/Birmingham & Burlington/Birch/Birge/Montgomery - PW STAFF (91,92,93,94,95,96,97,98)
Jan 23rd	Bayfront/Birch/Birmingham & Burlington/JC Beemer/Jackie Washington/Brampton - PW STAFF (99,100,101,102,103,104)
Jan 24th	Bayfront/JC Beemer/Wellington Square/Stirton Tot Lot/Delta/Dundurn Castle - PW STAFF (105,106,107,108,109,110)
Jan 25th	Bayfront/JC Beemer/Lifesaver/Beasley/Commonwealth Square - PW STAFF (111,112,113,114,115)
Jan 26th	Bayfront/Commonwealth Square/HAAA/Bishops/JC Beemer/Montgomery - PW STAFF(117,118,119,120,121,122)
Jan 29th	JC Beemer/Strachan/Churchill/Bishops/Gage/Durand/Victoria - PW STAFF (123,124,125,126,127,128,129)
Jan 30th	Bayfront/Jackie Washington/Bishops/JC Beemer/Delta - PW STAFF (130,131,132,133,135)
Jan 31st	Jackie Washington/Bayfront/JC Beemer/Bishops - PW STAFF (136,137,138,139)

FEBRUARY ENCAMPMENT CLEANUP TOTALS

Feb 1st	Bayfront/Olympic/William Connell/Gage Park/Sanford & King/JC Beemer - PW STAFF (1,2,3,4,5,6)
Feb 2nd	Hill St./120 Garside/JC Beemer/Birge/Woodlands/Ferguson Station/John & Rebecca - PW STAFF (7,8,9,10,11,12,13)
Feb 5th	JC Beemer/Wellington Square/Stroud/Barton St & Birge - PW STAFF (14,15,16,17)
Feb 6th	Bayfront x 6 - PW STAFF (18,19,20,21,22,23)
Feb 7th	Mountain Drive/Wellington St & Ferrie/Bayfront x 2 - PW STAFF (24,25,26,27)
Feb 8th	Bayfront/88 Ashley/Ferrie Tot/Fairley/Montgomery/Mary St./Century/Brampton - PW STAFF (28,29,30,31,32,33,34,35)
Feb 9th	Bayfront/Wellington Square/Wellington St/Nash/Lawrence & Kenilworth/William Connell/Thorne - PW STAFF (36,37,38,39,40,41,42)
Feb 12th	Bayfront x 4/Wellington Square/Ferrie Tot/Jackie Washington/JC Beemer/Rail Trail/Woodlands - PW STAFF (43,44,45,46,47,48,49,50,51,52)
Feb 13th	Bayfront/JC Beemer/Coronation/St.Joseph's Keddy Trail/Clairmont Access Keddy Trail/North Central - PW STAFF (53,54,55,56,57,58)

This is **Exhibit "B"** referred to in the Affidavit of Cory Manning affirmed before me at the City of Kitchener, in the Province of Ontario, on July 30, 2024 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:
Vivian Caldas
ABB4CB4C93B2B427...

Commissioner for Taking Affidavits
(or as may be)
Vivian Caldas (LSO No. 86862V)

March 2024 Daily Encampment Clean ups						
Count	Location	Regular Cleanup	Outreach Email/Request	HPS/By-Law Requested Parks Onsite	Time Spent with HPS/By-law/Onsite	Comments
Date: Friday March 1, 2024						
1	Bayfront	Yes	No	No	N/A	No Comment
2	Tiffany Barton	No	Yes	No	N/A	Onsite 8 hrs - Four 40yard bins filled from the site
Date: Monday March 4, 2024						
3	Bayfront	Yes	Yes	No	N/A	No Comment
4	Fairfield	Yes	No	No	N/A	No Comment
5	Kenilworth & Lawrence	No	Yes	No	30 mins	Request from Waste By-law
6	Mongomery	Yes	No	No	N/A	No Comment
7	Delta	Yes	No	Yes	3 Hrs	No Comment
8	JC Beemer	Yes	No	No	N/A	No Comment
Date: Tuesday March 5, 2024						
9	Bayfront	Yes	No	No	N/A	No Comment
10	Wellington Sq	Yes	No	No	N/A	No Comment
11	JC Beemer	Yes	No	No	N/A	No Comment
12	Alexander	No	Yes	No	N/A	Abandoned Tent

13	Montgomery	Yes	No	No	N/A	No Comment
14	Mountain Drive	No	Yes - councilors office	No	N/A	Clean Up/Compliance Notice
Date: Wednesday March 6, 2024						
15	Bishops Gate	No	Yes	No	1.5 Hrs	Clean Up/Compliance Notice
16	JC Beemer	No	Yes - councilors office	No	N/A	Spent 2hrs cleaning entire park and alleyway
17	Wentworth Alley Way	No	Yes	No	No	No Comment
18	Ferrie Lot	Yes	No	No	N/A	No Comment
19	Simcoe Lot	Yes	No	No	N/A	No Comment
20	Bayfront	Yes	No	No	N/A	No Comment
21	Powell	No	Yes	No	N/A	Abandoned Tent
22	Radial Trail	No	Yes	No	N/A	Abandoned Tents and garbage
Date: Thursday March 7, 2024						
23	Bayfront	Yes	No	No	N/A	No Comment
24	Delta	Yes	No	No	3 hrs	Clean Up/Compliance Notice
25	City Hall	Yes	No	No	N/A	No Comment
26	Stroud	No	No	No	N/A	Email From Parks North
27	Bayfront	Yes	No	No	N/A	No Comment
Date: Friday March 8, 2024						
28	Bayfront	Yes	No	No	N/A	No Comment
29	Gage	Yes	No	No	N/A	No Comment
30	Beasley	No	No	Yes	30 mins	Clean Up/Compliance Notice
31	Kenilworth & Lawrence	Yes	No	No	N/A	No Comment
32	Radial Trail	Yes	No	No	N/A	No Comment
Date: Monday March 11, 2024						
33	Fairfield	No	No	Yes	1 Hrs	Clean Up/Compliance Notice
34	Montgomery	Yes	No	No	N/A	No Comment
35	Kenilworth & Lawrence	Yes	No	No	N/A	No Comment
36	Wellington and Hunter	No	No	Yes	2 hrs	Clean Up/Compliance Notice
37	Bayfront	Yes	No	No	N/A	No Comment
38	Powell	Yes	No	No	N/A	No Comment

Date: Tuesday March 12, 2024						
39	Bayfront	Yes	No	No	N/A	No Comment
40	Wentworth Stairs	Yes	No	No	N/A	No Comment
41	Radial Trail	Yes	No	No	N/A	No Comment
42	Bishops Gate	Yes	No	No	N/A	No Comment
43	JC Beemer	No	No	Yes	1 Hrs	Clean Up/Compliance Notice
44	Wellington Sq	Yes	No	No	N/A	No Comment
45	Jackie Wash	Yes	No	No	N/A	No Comment
46	Kenilworth & Lawrence	Yes	No	No	N/A	No Comment
47	John & Rebecca	Yes	No	No	N/A	No Comment
Date: Wednesday March 13, 2024						
48	Bayfront	Yes	No	No	N/A	No Comment
49	Fairfield	Yes	No	No	N/A	No Comment
50	Montgomery	Yes	No	No	N/A	No Comment
51	Wellington Sq	Yes	No	No	N/A	No Comment
52	JC Beemer	Yes	No	No	N/A	No Comment
53	City Hall	Yes	No	No	N/A	No Comment
Date: Thursday March 14, 2024						
54	Bayfront	Yes	No	No	N/A	No Comment
55	Fairfield	Yes	No	No	N/A	No Comment
56	Montgomery	Yes	No	No	N/A	No Comment
57	Kenilworth & Lawrence	Yes	No	No	N/A	No Comment
58	Wentworth Stairs	Yes	No	No	N/A	No Comment
59	Radial Trail	Yes	No	No	N/A	No Comment
60	Mountain Drive	Yes	No	No	N/A	No Comment
61	Wellington Sq	Yes	No	No	N/A	No Comment
Date: Friday March 15, 2024						
62	Dundurn	Yes	No	No	N/A	No Comment
63	Bayfront	Yes	No	No	N/A	No Comment
64	Stranchan	Yes	No	No	N/A	No Comment

65	Jackie Wash	Yes	No	No	N/A	No Comment
66	Woodlands	Yes	No	No	N/A	No Comment
67	Cameron & Cannon	No	No	Yes	1 Hrs	Clean Up/Compliance Notice
68	Bishops Gate	Yes	No	No	N/A	No Comment
69	JC Beemer	Yes	No	No	N/A	No Comment
70	City Hall	Yes	Yes	No	N/A	Councillor request/Email

Date: Monday March 18, 2024

71	Bayfront	Yes	No	No	N/A	No Comment
72	JC Beemer	Yes	No	No	N/A	No Comment
73	Wellington Sq	Yes	No	No	N/A	No Comment
74	Fairfield	Yes	No	No	N/A	No Comment
75	Powell	Yes	No	No	N/A	No Comment
76	Pinky Lewis	Yes	No	No	N/A	No Comment
77	Woodlands	Yes	No	No	N/A	No Comment
78	Summers Lane	Yes	No	No	N/A	No Comment
79	Jackie Wash	Yes	No	No	N/A	No Comment
80	Olympic(Scenic)	No	Yes	No	1 Hr	Councillor request/Email

Date: Tuesday March 19, 2024

81	Bayfront	Yes	No	No	N/A	No Comment
82	City Hall	Yes	No	No	N/A	No Comment
83	Potruff & King	No	Yes	No	6 Hrs	Email From Outreach - 2 Abandoned 1 Active Tent
84	JC Beemer	Yes	No	No	N/A	No Comment

Date: Wednesday March 20, 2024

85	Bayfront	Yes	No	No	N/A	No Comment
86	Bishops Gate	Yes	No	No	N/A	No Comment
87	Wellington Sq	Yes	No	No	N/A	No Comment
88	McNab & Hunter	No	Yes	Yes	3 Hrs	Clean Up/Compliance Notice
89	Woodlands	Yes	No	No	N/A	No Comment
90	Radial Trail	Yes	No	No	N/A	No Comment

Date: Thursday March 21, 2024

91	Bayfront	Yes	No	No	N/A	No Comment
92	Mountain Drive	No	Yes	No	30 mins	Councillor request/Email
93	JC Beemer	Yes	No	No	N/A	No Comment
94	Wellington Sq	Yes	No	No	N/A	No Comment
95	Bishops Gate	Yes	No	No	N/A	No Comment
96	Kenilworth & Lawrence	Yes	No	No	N/A	No Comment
97	Gage Park	Yes	No	No	N/A	No Comment
98	Montgomery	Yes	No	No	N/A	No Comment
99	Delta	Yes	No	Yes	2hrs	Clean Up/Compliance Notice
Date: Friday March 22, 2024						
100	Bayfront	Yes	No	No	N/A	No Comment
102	JC Beemer	Yes	No	No	N/A	No Comment
103	Wellington Sq	Yes	No	No	N/A	No Comment
104	City Hall	Yes	No	No	N/A	No Comment
105	Stranchan	Yes	No	No	N/A	No Comment
106	Beasley	Yes	No	No	N/A	No Comment
107	Stroud	Yes	No	No	N/A	No Comment
108	Jackie Wash	Yes	No	No	N/A	No Comment
109	Churchill	No	Yes	Yes	1hr	No Comment
Date: Monday March 25, 2024						
110	JC Beemer	No	No	No	1 Hrs	Police to Call Centre
111	Bayfront	Yes	No	No	N/A	No Comment
112	Wellington Sq	Yes	No	No	N/A	No Comment
113	City Hall	Yes	No	No	N/A	No Comment
114	Radial Trail - Wentw to Young	Yes	No	No	N/A	No Comment
115	Kenilworth & Lawrence	Yes	No	No	N/A	No Comment
116	Fairfield	Yes	No	No	N/A	No Comment
Date: Tuesday March 26, 2024						
117	Radial Trail - Wentw to Young	Yes	No	No	N/A	No Comment
118	Radial Trail - Wentw to Kimberly Stairs	Yes	No	No	N/A	No Comment

[illegible]

April 2024 Daily Encampment Clean ups						
Count	Location	Regular Cleanup	Outreach Email/Request	HPS/By-Law Requested Parks Onsite	Time Spent with HPS/By-law Onsite	Comments
Date: Tuesday April 2, 2024						
1	City Hall	No	No	Yes	3 Hrs	People voluntarily moving off site
2	JC Beemer	Yes	No	No	N/A	No Comment
3	Wellington Sq	Yes	No	No	N/A	No Comment
4	Bayfront	Yes	No	No	N/A	No Comment
Date: Wednesday April 3, 2024						
5	JC Beemer	Yes	No	No	N/A	No Comment
6	Bayfront	Yes	No	No	N/A	No Comment
7	Woodlands	Yes	No	No	N/A	No Comment
8	Bishops Gate	Yes	No	No	N/A	No Comment
9	City Hall	No	No	Yes	6 Hrs	People voluntarily moving off site
Date: Thursday April 4, 2024						
10	JC Beemer	Yes	No	No	N/A	No Comment
11	Bayfront	Yes	No	No	N/A	No Comment
12	Wellington Sq	Yes	No	No	N/A	No Comment

13	Delta	No	Yes	Yes	1hr	Outreach/Councilor request
14	Montgomery	Yes	No	No	N/A	No Comment
15	City Hall	No	No	Yes	3 Hrs	People voluntarily moving off site
Date: Friday April 5, 2024						
16	City Hall	No	No	Yes	1 Hrs	People voluntarily moving off site
17	Montgomery	Yes	No	No	N/A	No Comment
18	JC Beemer	Yes	No	No	N/A	No Comment
19	Kenilworth & Lawrence	Yes	No	No	N/A	No Comment
20	Bayfront	Yes	No	No	N/A	No Comment
21	Stroud	Yes	No	No	N/A	No Comment
22	Sirente	Yes	No	No	N/A	No Comment
Date: Monday April 8, 2024						
23	City Hall	No	No	Yes	6 Hrs	People voluntarily moving off site. On Site with HPS till 6pm
24	Bayfront	Yes	No	No	N/A	No Comment
25	JC Beemer	Yes	No	No	N/A	No Comment
26	Wellington Sq	Yes	No	No	N/A	No Comment
27	Woodlands	Yes	No	No	N/A	No Comment
28	Bishops Gate	Yes	No	No	N/A	No Comment
Date: Tuesday April 9, 2024						
29	Bayfront	Yes	No	No	N/A	No Comment
30	JC Beemer	Yes	No	No	N/A	No Comment
31	Mountain Drive	No	Yes	No	1 hr	Outreach/Councilor request
32	Jackie Washington	No	Yes	No	1 hr	Outreach/Councilor request
33	Upper Sherman and Rexford	No	Yes	No	1 hr	Outreach/Councilor request
34	City Hall	No	No	Yes	8 Hrs	People voluntarily moving off site. On Site with HPS till 6pm
Date: Wednesday April 10, 2024						
35	Jackie Washington	No	Yes	No	1 hr	Outreach/Councilor request
36	Upper Sherman and Rexford	No	Yes	No	30 mins	Outreach/Councilor request
37	City Hall	No	No	Yes	1 Hrs	Site is clear
38	Kenilworth and Limeridge	No	Yes	No	30 mins	Outreach/Councilor request
39	Bridge	No	Yes	No	30 mins	Outreach/Councilor request
40	Woodlands	Yes	No	No	N/A	No Comment
41	Fairfield	Yes	No	No	N/A	Call Centre Complaint

42	Montgomery	Yes	No	No	N/A	No Comment
Date: Thursday April 11, 2024						
43	Montgomery	Yes	No	No	N/A	No Comment
44	JC Beemer	No	Yes	No	1 hr	Outreach/Councilor request
45	Jackie Washington	Yes	No	No	N/A	No Comment
46	Bayfront	Yes	No	No	N/A	No Comment
47	Wellington Sq	Yes	No	No	N/A	No Comment
48	Kennilworth and Lawrance	Yes	No	No	N/A	No Comment
Date: Friday April 12, 2024						
49	JC Beemer	No	Yes	No	1 hr	Outreach/Councilor request
50	Bayfront	Yes	No	No	N/A	No Comment
51	Montgomery	Yes	No	No	N/A	No Comment
52	Eastmount	No	Yes	No	30 mins	Outreach/Councilor request
53	Victoria	No	Yes	No	1 hr	Outreach/Councilor request
54	Delta	Yes	Yes	No	1 hr	Outreach/Councilor request
55	Pink Lewis	No	Yes	No	30 mins	Outreach/Councilor request
56	Myrtle	No	Yes	No	30 mins	Outreach/Councilor request
Date: Monday April 15, 2024						
57	JC Beemer	Yes	No	No	N/A	No Comment
58	Bayfront	Yes	No	No	N/A	No Comment
59	Mountain Drive	No	Yes	No	30 hr	Outreach/Councilor request
60	Kennilworth and Lawrance	Yes	No	No	N/A	No Comment
61	Wellington Sq	No	No	Yes	4 hrs	HPS and By-Law request to be on site for compliance
62	Common Wealth sq	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
Date: Tuesday April 16, 2024						
63	Bishops Gate	No	Yes	No	1 hrs	Outreach request
64	Birge	Yes	No	No	N/A	No Comment
65	Woodlands	Yes	No	No	N/A	No Comment
66	Delta	No	Yes	No	1 hrs	Outreach/Councilor request
67	Common Wealth Sq	No	No	Yes	4 hrs	HPS and By-Law request to be on site for compliance
68	Nash rd & King	No	No	Yes	4 hrs	HPS and By-Law request to be on site for compliance
69	JC Beemer	Yes	No	No	N/A	No Comment
70	Redhill	Yes	No	No	N/A	No Comment

71	Durand	No	No	No	N/A	Call Centre Complaint
Date: Wednesday April 17, 2024						
72	JC Beemer	Yes	No	No	N/A	No Comment
73	Bayfront	Yes	No	No	N/A	No Comment
74	Wellington Sq	Yes	No	No	N/A	No Comment
75	Jackie Washington	Yes	No	No	N/A	No Comment
76	Whiteher	Yes	No	No	N/A	No Comment
77	Cater Park	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
78	Upper Wellington	Yes	No	No	N/A	No Comment
Date: Thursday April 18, 2024						
79	Bayfront	Yes	No	No	N/A	No Comment
80	Central	Yes	No	No	N/A	No Comment
81	Carloline St	Yes	No	No	N/A	No Comment
82	Stroud	Yes	No	No	N/A	No Comment
83	Strachen	Yes	No	No	N/A	No Comment
84	JC Beemer	Yes	No	No	N/A	No Comment
85	Whitehern	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
86	MacNab and Hunter st	No	No	Yes	2 hrs	HPS and By-Law request to be on site for compliance
Date: Friday April 19, 2024						
87	Bayfront	Yes	No	No	N/A	No Comment
88	JC Beemer	Yes	No	No	N/A	No Comment
89	Wellington Sq	Yes	No	No	N/A	No Comment
90	Montgomery	Yes	No	No	N/A	No Comment
91	Kennilworth and Lawrance	Yes	No	No	N/A	No Comment
92	Fairfield	Yes	No	No	N/A	No Comment
93	Barton & Tiffany	Yes	No	No	N/A	No Comment
94	Corktown Trail	No	Yes	No	N/A	Contractor - Clean up for community cleanup event
95	Radial Trail East of Wentworth	No	Yes	No	N/A	Contractor - Clean up for community cleanup event
96	Wentworth Stairs	No	Yes	No	N/A	Contractor - Clean up for community cleanup event
97	Queen St	No	Yes	No	N/A	Contractor - Clean up for community cleanup event
Date: Monday April 22, 2024						
98	Sam Lawrance	No	Yes	No	N/A	Outreach request
99	Bayfront	Yes	No	No	N/A	No Comment

100	JC Beemer	Yes	No	No	N/A	No Comment
101	Wellington Sq	Yes	No	No	N/A	No Comment
102	MacNab St	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
103	Hunter St	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
104	Shamrock Park	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
105	Jackson st	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
Date: Tuesday April 23, 2024						
106	Victoria & Young st	No	No	Yes	1 hrs	Outreach request
107	MacNab St	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
108	Hunter St	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
109	Jackson st	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
110	Clairemont Access	No	No	Yes	2 hrs	HPS and By-Law request to be on site for compliance
111	Mark Anthony	No	No	Yes	1 hrs	Councilor request
112	Central	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
113	Bayfront	Yes	No	No	N/A	No Comment
Date: Wednesday April 24, 2024						
114	Delta	Yes	Yes	No	1 hrs	Outreach request
115	Kennilworth and Lawrance	Yes	No	No	30 mins	Outreach request
116	JC Beemer	Yes	No	No	4 hrs	HPS and By-Law request to be on site for compliance
117	Montgomery	Yes	No	No	N/A	No Comment
118	Wellington Sq	Yes	No	No	N/A	No Comment
119	Fairfield	Yes	No	No	N/A	No Comment
Date: Thursday April 25, 2024						
120	Bayfront	Yes	No	No	N/A	No Comment
121	Wellington Sq	Yes	No	No	N/A	No Comment
122	Wellington & Hunter	Yes	No	No	N/A	No Comment
123	Mountain Drive	No	Yes	No	30 mins	Outreach/Councilor request
124	Montgomery	Yes	No	No	N/A	No Comment
125	Victoria & Young st	Yes	No	Yes	N/A	No Comment
126	Victoria & Young st	No	No	Yes	30 mins	Outreach request
127	Delta	No	Yes	No	20 mins	Outreach request
128	Bishops Gate	Yes	Yes	No	20 mins	Outreach request
129	Central Park	No	No	No	N/A	Parks North Complaint. No encampments

130	Strachan	No	No	No	N/A	Contractor
131	Carter	No	No	No	N/A	Contractor
132	Young st	No	No	No	N/A	Contractor
133	445 Charlton st	No	No	No	6 Hrs	abandon encampant on the escarpment - Contractor
Date: Friday April 26, 2024						
134	Bayfront	Yes	No	No	N/A	No Comment
135	JC Beemer	No	No	Yes	1hrs	HPS Request
136	Ferrie St	Yes	No	No	N/A	No Comment
137	Simcoe St	Yes	No	No	N/A	No Comment
138	Jackie Washington	Yes	No	No	N/A	No Comment
139	Cathedral Dog Park	No	No	No	2 hrs	HPS Request/ Fire Clean up
140	179 George St	No	Yes	No	N/A	Outreach request
Date: Monday April 29, 2024						
141	Bayfront	Yes	No	No	3 hrs	Spent 3 hrs at bayfront cleaning encampments
142	Fairfield	Yes	No	No	N/A	No Comment
143	Montgomery	Yes	No	No	N/A	No Comment
144	Wellington Sq	Yes	No	No	N/A	No Comment
145	JC Beemer	Yes	No	No	N/A	No Comment
146	Caroline St	Yes	No	No	N/A	No Comment
147	Kenilworth	No	Yes	No	30 mins	Outreach request
Date: Tuesday April 30, 2024						
148	Bayfront	Yes	No	No	N/A	No Comment
149	Delta	Yes	No	No	N/A	No Comment
150	Pinky Lewis	Yes	No	No	N/A	No Comment
151	Kenilworth	Yes	No	No	N/A	No Comment
152	Mountain Dr	Yes	No	No	N/A	No Comment
153	Cathedral Dog Park	Yes	No	No	N/A	No Comment
154	780 Up. Wentworth	No	No	No	N/A	Outreach request
155	Senior Centre	No	No	No	N/A	Outreach request

May 2024 Daily Encampment Clean ups						
Count	Location	Regular Cleanup	Outreach Email/Request	HPS/By-Law Requested Parks Onsite	Time Spent with HPS/By-law Onsite	Comments
Date: Wednesday May 1, 2024						
1	Bayfront	Yes	No	No	N/A	No Comment
2	Montgomery	Yes	No	No	N/A	No Comment
3	Wellington Sq	Yes	No	No	N/A	No Comment
4	Mark Anthony	Yes	No	No	N/A	No Comment
5	Myrtle	Yes	No	No	N/A	No Comment
6	Bishops Gate	Yes	No	No	N/A	No Comment
7	Wentworth - Stairs to Youngie	Yes	No	No	N/A	No Comment
8	Delta	Yes	No	No	N/A	No Comment
9	Mohawk Sports	No	No	No	1 Hrs	HPS and By-Law request to be on site for compliance
10	Arbour rd	No	No	No	30 mins	HPS and By-Law request to be on site for compliance
11	Andrew Warburton	Yes	No	No	N/A	No Comment
12	Strachan	Yes	No	No	N/A	No Comment
13	Birge	Yes	No	No	N/A	No Comment
Date: Thursday May 2, 2024						

14	Bayfront	Yes	No	No	N/A	No Comment
15	Queen St	Yes	No	No	N/A	No Comment
16	Delta	No	No	No	4 hrs	HPS and By-Law request to be on site for compliance
Date: Friday May 3, 2024						
17	Bayfront	Yes	No	No	N/A	No Comment
18	Woodlands	No	No	No	2 hrs	HPS and By-Law request to be on site for compliance
19	Montgomery	Yes	No	No	N/A	No Comment
20	Fairfield	Yes	No	No	N/A	No Comment
21	Liberty	Yes	No	No	N/A	No Comment
22	Kenilworth	Yes	No	No	N/A	No Comment
Date: Saturday May 4, 2024						
23	JC Beemer	No	No	Yes	1Hr	Police request to remove propane tanks
Date: Monday May 6, 2024						
24	Bayfront	Yes	No	No	N/A	No Comment
25	Wellington Sq	Yes	No	No	N/A	No Comment
26	Mark Anthony	Yes	No	No	30 min	Outreach request
27	Bishops Gate	Yes	No	No	30 min	Outreach request
28	Kenilworth Fire Hall	No	No	No	30 min	Outreach request
29	Kenilworth & Lawerance	Yes	No	No	N/A	No Comment
30	Montgomery	Yes	No	No	N/A	No Comment
31	Fairfield	Yes	No	No	N/A	No Comment
32	Strachan	No	No	No	30 min	Outreach request
33	Mountain Dr	Yes	No	No	N/A	No Comment
Date: Tuesday May 7, 2024						
34	Bayfront	Yes	No	No	N/A	No Comment
35	Bishops Gate	Yes	No	No	N/A	No Comment
36	JC Beemer	No	No	Yes	2 hrs	HPS and By-Law request to be on site for compliance
37	Young St	Yes	No	No	N/A	No Comment
38	MacNab Bus Shelter	No	No	Yes	2 hrs	HPS and By-Law request to be on site for compliance
39	Gourley	No	No	No	30 min	Outreach request
40	Strachan	Yes	No	No	N/A	No Comment
Date: Wednesday May 8, 2024						
41	Bayfront	Yes	No	No	N/A	No Comment

42	Maclaren	No	Yes	No	1 Hr	Outreach request
43	John St	No	Yes	No	1 Hr	Outreach request
44	Gore Park	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
45	JC Beemer	No	No	Yes	2 hrs	HPS and By-Law request to be on site for compliance
46	Jackie Washington	Yes	No	No	N/A	No Comment
47	Wellington Sq	Yes	No	No	N/A	No Comment
48	Delta	No	Yes	No	1 Hr	Outreach request

Date: Thursday May 9, 2024

49	Bayfront	Yes	No	No	N/A	No Comment
50	JC Beemer	Yes	No	No	N/A	No Comment
51	Carter	Yes	No	No	N/A	No Comment
52	JC Beemer	Yes	No	No	N/A	No Comment
53	Wellington Sq	No	Yes	No	1 Hr	Outreach request
54	Montgomery	Yes	No	No	N/A	No Comment
55	Strachan	Yes	No	No	N/A	No Comment
56	Fairfield	Yes	No	No	N/A	No Comment
57	Myrtle Park	No	Yes	No	30 min	Facilities request
58	Woodlands	Yes	No	No	N/A	No Comment

Date: Friday May 10, 2024

59	Sherman and Charlton	No	Yes	No	1 hr	Outreach request
60	Jackson and MacNab	No	Yes	No	1 hr	Outreach request
61	Bayfront	No	No	Yes	4 hrs	HPS and By-Law request to be on site for compliance
62	Kenilworth & Lawerance	Yes	No	No	N/A	No Comment
63	JC Beemer	Yes	No	No	N/A	No Comment

Date: Monday May 13, 2024

64	JC Beemer	Yes	No	No	N/A	No Comment
65	Bayfront	Yes	No	No	N/A	No Comment
66	Wellington Sq	No	Yes	No	1 Hr	Outreach request
67	Montgomery	Yes	No	No	N/A	No Comment
68	Clairmont and Charlton	No	Yes	No	1 hr	Outreach request
69	Jackie Washington	Yes	No	No	N/A	No Comment
70	Delta	No	Yes	No	1 Hr	Outreach request
71	Golf Links	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance

Date: Tuesday May 14, 2024						
72	JC Beemer	Yes	No	No	N/A	No Comment
73	Bayfront	Yes	No	No	N/A	No Comment
74	Wellington Sq	Yes	No	No	N/A	No Comment
75	Bishops Gate	No	Yes	No	30 min	Outreach request
76	Wentworth Trail	Yes	No	No	N/A	No Comment
77	Andrew Warburton	No	Yes	No	30 min	Outreach request
78	Mountain Dr	No	Yes	No	30 min	Outreach request
79	York St and Bay	No	Yes	No	1 hr	Outreach request
80	North Central	No	Yes	No	30 min	Outreach request
81	Kenilworth & Lawerance	Yes	No	No	N/A	No Comment
82	Strachan	Yes	No	No	N/A	No Comment
Date: Wednesday May 15, 2024						
83	Bayfront	Yes	No	No	N/A	No Comment
84	JC Beemer	Yes	No	No	N/A	No Comment
85	Wellington Sq	Yes	No	No	N/A	No Comment
86	Bishops Gate	Yes	No	No	N/A	No Comment
87	Montgomery	Yes	No	No	N/A	No Comment
88	Fairfield	Yes	No	No	N/A	No Comment
89	Wentworth Trail	Yes	No	No	N/A	No Comment
90	Nash rd	No	Yes	No	1 hr	Outreach request
91	Tiffany and Barton	No	Yes	No	1 hr	Outreach request
Date: Thursday May 16, 2024						
92	Bayfront	Yes	No	No	N/A	No Comment
93	JC Beemer	Yes	No	No	N/A	No Comment
94	Wellington Sq	Yes	No	No	N/A	No Comment
95	Wellington and Hunter	Yes	No	No	N/A	No Comment
96	Delta	Yes	No	No	N/A	No Comment
97	Bishops Gate	Yes	No	No	N/A	No Comment
98	Gage Park	No	Yes	No	1 hr	Outreach request
99	Tiffany and Barton	Yes	No	No	N/A	No Comment
100	Wentworth Trail	Yes	No	No	N/A	No Comment
101	Myrtle	Yes	No	No	N/A	No Comment

Date: Friday May 18, 2024						
102	Bay St & York Bus Stop	No	Yes	No	1 hr	Outreach request
103	Peace Gardens	No	Yes	No	1 hr	Outreach request
104-108	Wentworth Trail	Yes	No	No	N/A	Cleaned 5 separate locations
109	JC Beemer	Yes	No	No	N/A	No Comment
Date: Tuesday May 21, 2024						
110	Bayfront	Yes	No	No	3 hrs	Outreach request
111	JC Beemer	Yes	No	No	N/A	No Comment
112	Wellington Sq	Yes	No	No	N/A	No Comment
113	Jackie Washington	Yes	No	No	N/A	No Comment
114	Ferrie Lot	Yes	No	No	N/A	No Comment
115	Simcoe Lot	Yes	No	No	N/A	No Comment
116	Ferguson St	Yes	No	No	N/A	No Comment
117	Kenilworth & Lawerance	Yes	No	No	N/A	No Comment
118	Central Park	No	No	Yes	1.5 hrs	HPS and By-Law request to be on site for compliance
119	Hillcrest	No	No	Yes	1.5 hrs	HPS and By-Law request to be on site for compliance
120	Valery	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
121	Rosedale	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
122	Bishops Gate	Yes	No	No	N/A	No Comment
Date: Wednesday May 22, 2024						
123	Bayfront	Yes	No	No	N/A	No Comment
124	JC Beemer	Yes	No	No	N/A	No Comment
125	Central Park	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
126	Wellington Sq	Yes	No	No	N/A	No Comment
127	Charlton and Sherman Cut	No	No	No	1 hrs	Outreach request
128	Mountain Dr	Yes	No	No	N/A	No Comment
129	Young St	No	No	No	1 hrs	Outreach request
130	Myrtle Park	Yes	No	No	N/A	No Comment
131	Fairfield	Yes	No	No	N/A	No Comment
132	Montgomery	Yes	No	No	N/A	No Comment
133	Stirton Tot	Yes	No	No	N/A	No Comment
134	Gore Park	No	No	Yes	2 hrs	HPS and By-Law request to be on site for compliance
Date: Thursday May 23, 2024						

135	Bayfront	Yes	No	No	N/A	No Comment
136	JC Beemer	Yes	No	No	N/A	No Comment
137	Woodlands	Yes	No	No	N/A	No Comment
138	Wellington Sq	Yes	No	No	N/A	No Comment
139	Birch Ave	No	No	Yes	3 hrs	HPS and By-Law request to be on site for compliance
Date: Friday May 24, 2024						
140	Delta	Yes	No	No	N/A	No Comment
141	Montgomery	Yes	No	No	N/A	No Comment
142	Bayfront	Yes	No	No	N/A	No Comment
143	JC Beemer	Yes	No	No	N/A	No Comment
144	Wellington Sq	Yes	No	No	N/A	No Comment
145	Birch Ave & Burlington	No	No	No	1 hrs	Outreach request
146	Birch Parkette	No	No	Yes	30 mins	HPS and By-Law request to be on site for compliance
147	Jackie Washington	Yes	No	No	N/A	No Comment
148	Sam Lawerance	Yes	No	No	N/A	No Comment
149	Mountain Dr	Yes	No	No	N/A	No Comment
Date: Sunday May 26, 2024						
150	Sam Lawerance	No	No	No	N/A	Fire Clean up
Date: Monday May 27, 2024						
151	Bayfront	Yes	No	No	N/A	No Comment
152	Myrtle Park	Yes	No	No	30 mins	Facilities
153	90 Potruff	No	No	No	1 hrs	Outreach request
154	Kennilworth Stairs	No	No	No	1 hrs	Outreach request
155	Kennilworth and Lawerance	Yes	No	No	N/A	No Comment
156	JC Beemer	Yes	No	No	N/A	No Comment
157	Wellington Sq	Yes	No	No	N/A	No Comment
158	Gore Park	No	No	No	1 hrs	Outreach request
159	Peace Gardens	No	No	No	1 hrs	Outreach request
160	Delta	Yes	No	No	N/A	No Comment
161	Montgomery	Yes	No	No	N/A	No Comment
Date: Tuesday May 21, 2024						
162	Bayfront	Yes	No	No	N/A	No Comment
163	JC Beemer	Yes	No	No	N/A	No Comment

164	Strachan	Yes	No	No	N/A	No Comment
165	Montgomery	Yes	No	No	N/A	No Comment
166	Stroud	No	No	No	1.5 hrs	Outreach request
167	Young St	No	No	Yes	2 Hrs	HPS and By-Law request to be on site for compliance
Date: Wednesday May 29, 2024						
168	Bayfront	Yes	No	No	N/A	No Comment
169	JC Beemer	Yes	No	No	N/A	No Comment
170	Wellington Sq	Yes	No	No	N/A	No Comment
171	Fairfield Park	Yes	No	No	N/A	No Comment
172	Carter Park	Yes	No	No	N/A	No Comment
173	Lifesaver	No	No	No	1 hrs	Outreach request
174	Rail Trail	Yes	No	No	1 hrs	Outreach request
Date: Thursday May 30, 2024						
175	Bayfront	Yes	No	No	N/A	No Comment
176	Montgomery	Yes	No	No	N/A	No Comment
177	Myrtle Park	Yes	No	No	N/A	No Comment
178	Delta	Yes	No	No	N/A	No Comment
179	Gage Park	Yes	No	No	N/A	No Comment
180	Lifesaver	Yes	No	No	1 hrs	Outreach request
181	Wentworth Stairs	Yes	No	No	1 hrs	Outreach request
182	Carter Park	Yes	No	No	N/A	No Comment
183	JC Beemer	No	No	Yes	2 Hrs	HPS and By-Law request to be on site for compliance
184	Jackie Washington	Yes	No	No	N/A	No Comment
Date: Friday May 31, 2024						
185	Bayfront	Yes	No	No	1 hrs	Outreach Request Abandon Tent
186	Burford	Yes	No	No	1 hrs	Outreach request
187	Jackie Washington	Yes	No	No	N/A	No Comment
188	Station 30	No	No	No	30 Mins	Outreach request
190	Ferrie St Lot	Yes	No	No	N/A	No Comment
191	Simcoe Lot	Yes	No	No	N/A	No Comment

June 2024 Daily Encampment Clean ups						
Count	Location	Regular Cleanup	Outreach Email/Request	HPS/By-Law Requested Parks Onsite	Time Spent with HPS/By-law Onsite	Comments
Date: Monday June 3, 2024						
1	Bayfront	Yes	No	No	N/A	No Comment
2	Mountain Dr	No	Yes	No	1 Hr	Outreach request
3	Upper Sherman	No	No	Yes	1.5 hrs	HPS and By-Law request to be on site for compliance
4	Clairmont	Yes	No	No	N/A	No Comment
5	Kenilworth and Lawerance	Yes	No	No	N/A	No Comment
6	Woodlands	No	No	Yes	2 hrs	HPS and By-Law request to be on site for compliance
7	Woolverton	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
8	JC Beemer	Yes	No	No	N/A	No Comment
Date: Tuesday June 4, 2024						
9	Bayfront	Yes	No	No	N/A	No Comment
10	JC Beemer	Yes	No	No	N/A	No Comment
11	Gage Park	Yes	No	Yes	3 hrs	HPS and By-Law request to be on site for compliance
12	Bishops Gate	Yes	No	No	N/A	No Comment
13	Kenilworth and Lawerance	Yes	No	No	N/A	No Comment

Date: Wednesday June 5, 2024						
14	Bayfront	Yes	No	No	N/A	No Comment
15	Gage Park	Yes	No	Yes	2.5 hrs	HPS and By-Law request to be on site for compliance
16	McLaren	No	Yes	No	30 min	Outreach request
17	North Central	No	Yes	No	30 min	Outreach request
18	Ferrie Lot	Yes	No	No	N/A	No Comment
19	Jackie Washington	Yes	No	No	N/A	No Comment
20	Simcoe	Yes	No	No	N/A	No Comment
21	Fairfield	Yes	No	No	N/A	No Comment
22	Montgomery	Yes	No	No	N/A	No Comment
Date: Thursday June 6, 2024						
23	Bayfront	Yes	No	Yes	2.5 hrs	HPS and By-Law request to be on site for compliance
24	Barton & Tiffany	Yes	No	Yes	5 hrs	HPS and By-Law request to be on site for compliance
Date: Friday June 7, 2024						
25	Bayfront	Yes	No	No	N/A	No Comment
26	Southam	Yes	No	No	N/A	No Comment
27	Mountain Dr	Yes	No	No	N/A	No Comment
28	Durndurn Parkette	Yes	No	No	N/A	No Comment
29	Eugene and Potruff	Yes	No	No	N/A	No Comment
30	Trail From wentworth to Young	Yes	No	No	N/A	No Comment
31	455 Charlton	No	No	No	N/A	Contractor Clean up
Date: Monday June 10, 2024						
32	Bayfront	Yes	No	No	N/A	No Comment
33-35	Jackie Washington	Yes	No	No	N/A	No Comment
36	Wellington Sq	Yes	No	No	N/A	No Comment
37	Strachan	Yes	No	No	N/A	No Comment
38	JC Beemer	Yes	No	No	N/A	No Comment
39	455 Charlton	Yes	No	No	N/A	No Comment
40	Victoria	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
41	Shamrock	No	No	Yes	2 hrs	HPS and By-Law request to be on site for compliance
Date: Tuesday June 11, 2024						
42	Radial Trail	Yes	No	No	N/A	No Comment
43	Wentworth Stairs	Yes	No	No	N/A	No Comment

44-45	Mountain Dr	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
46	Vincent Massey	Yes	No	No	N/A	No Comment
47	Nash Road	No	Yes	No	30 min	Outreach request
Date: Wednesday June 12, 2024						
48	Vincent Massey	Yes	No	No	N/A	No Comment
49	Mountain Dr	Yes	No	No	N/A	No Comment
50	Delta	Yes	No	No	N/A	No Comment
51	Montgomery	Yes	No	No	N/A	No Comment
52	Mahoney	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
53	Bayfront	Yes	No	No	N/A	No Comment
54	Central	Yes	No	No	N/A	No Comment
Date: Thursday June 13, 2024						
55	Fairfield	Yes	No	No	N/A	No Comment
56	Montgomery	Yes	No	No	N/A	No Comment
57	Mountain Dr	Yes	No	No	N/A	Call for abandoned tent
58	Kenilworth and Lawerance	Yes	No	No	5 hrs	No Comment
59	Bayfront	Yes	No	No	N/A	Contractor
60	Wellington Sq	Yes	No	No	N/A	Contractor
61	Delta	Yes	No	No	N/A	Contractor
62	Mountain Dr	Yes	No	No	N/A	Contractor
63	Bishops Park	Yes	No	No	N/A	Contractor
64	JC Beemer	Yes	No	No	N/A	Contractor
65	Montgomery	Yes	No	No	N/A	Contractor
Date: Friday June 14, 2024						
66	241 Wellington St	No	No	No	N/A	No Comment
67	JC Beemer	Yes	No	No	N/A	No Comment
68	Bayfront	Yes	No	No	N/A	No Comment
69	McNab & Hunter St	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
70	Whitehearn	No	No	Yes	2 hrs	HPS and By-Law request to be on site for compliance
71	Stroud	No	No	Yes	2 hrs	HPS and By-Law request to be on site for compliance
72	Bayfront	Yes	No	No	N/A	Contractor
73	Wellington Sq	Yes	No	No	N/A	Contractor
74	Delta	Yes	No	No	N/A	Contractor

75	Mountain Dr	Yes	No	No	N/A	Contractor
76	Bishops Park	Yes	No	No	N/A	Contractor
77	JC Beemer	Yes	No	No	N/A	Contractor
78	Montgomery	Yes	No	No	N/A	Contractor
Date: Monday June 17, 2024						
79	Bayfront	No	No	Yes	2 hrs	HPS and By-Law request to be on site for compliance
80	Montgomery	Yes	No	No	N/A	No Comment
81,82	Jackie Washington	Yes	No	No	N/A	No Comment
83	Bayfront	Yes	No	No	N/A	Contractor
84	Wellington Sq	Yes	No	No	N/A	Contractor
85	Delta	Yes	No	No	N/A	Contractor
86	Mountain Dr	Yes	No	No	N/A	Contractor
87	Bishops Park	Yes	No	No	N/A	Contractor
88	JC Beemer	Yes	No	No	N/A	Contractor
89	Montgomery	Yes	No	No	N/A	Contractor
Date: Tuesday June 18, 2024						
90	Bayfront	No	No	Yes	2 hrs	HPS and By-Law request to be on site for compliance
91	Clairmont	No	Yes	No	30 min	Outreach request
92	Old Mohawk rd	No	Yes	No	30 min	Outreach request
93	Fairfield	Yes	No	No	N/A	No Comment
94	Strachan	Yes	No	No	N/A	No Comment
95	Delta	No	No	Yes	2 hrs	HPS and By-Law request to be on site for compliance
96	Gage Park	Yes	No	No	N/A	No Comment
97	Bayfront	Yes	No	No	N/A	Contractor
98	Wellington Sq	Yes	No	No	N/A	Contractor
99	Delta	Yes	No	No	N/A	Contractor
100	Mountain Dr	Yes	No	No	N/A	Contractor
101	Bishops Park	Yes	No	No	N/A	Contractor
102	JC Beemer	Yes	No	No	N/A	Contractor
103	Montgomery	Yes	No	No	N/A	Contractor
Date: Wednesday June 19, 2024						
104	Fairfield	Yes	No	No	N/A	No Comment
105	Kenilworth and lawerance	Yes	No	No	N/A	No Comment

106	Quigley and King	No	No	No	N/A	No Comment
107	Carter	Yes	No	No	N/A	No Comment
108	Main and Macnab	No	No	Yes	2 hrs	HPS and By-Law request to be on site for compliance
109	Bayfront	Yes	No	No	N/A	Contractor
110	Wellington Sq	Yes	No	No	N/A	Contractor
111	Delta	Yes	No	No	N/A	Contractor
112	Mountain Dr	Yes	No	No	N/A	Contractor
113	Bishops Park	Yes	No	No	N/A	Contractor
114	JC Beemer	Yes	No	No	N/A	Contractor
115	Montgomery	Yes	No	No	N/A	Contractor

Date: Thursday June 20, 2024

116	Starchan	No	Yes	No	30 min	Outreach request
117	Ferguson Station	No	No	Yes	2.5 hrs	HPS and By-Law request to be on site for compliance
118	Fairfield	Yes	No	No	N/A	No Comment
119	Montgomery	Yes	No	No	N/A	No Comment
120	JC Beemer	No	No	Yes	1.5 hrs	HPS and By-Law request to be on site for compliance
121	Jackie Washington	Yes	No	No	N/A	No Comment
122	St.Christopher	Yes	No	No	N/A	No Comment
123	Montgomery	Yes	No	No	N/A	Contractor
124	Bayfront	Yes	No	No	N/A	Contractor
125	Wellington Sq	Yes	No	No	N/A	Contractor
126	Delta	Yes	No	No	N/A	Contractor
127	Mountain Dr	Yes	No	No	N/A	Contractor
128	Bishops Park	Yes	No	No	N/A	Contractor
129	JC Beemer	Yes	No	No	N/A	Contractor

Date: Friday June 21, 2024

130	Stirton Tot	Yes	No	No	N/A	No Comment
131	Bayfront	Yes	No	No	N/A	No Comment
132	Simcoe St	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
133	Jackie Washington	Yes	No	No	N/A	No Comment
134	Birge	Yes	No	No	N/A	No Comment
135	Birch	No	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
136	Ferguson Station	Yes	No	No	N/A	No Comment

137	272 Avondale	No	Yes	No	1 Hrs	Outreach request
138	Montgomery	Yes	No	No	N/A	Contractor
139	Bayfront	Yes	No	No	N/A	Contractor
140	Wellington Sq	Yes	No	No	N/A	Contractor
141	Delta	Yes	No	No	N/A	Contractor
142	Mountain Dr	Yes	No	No	N/A	Contractor
143	Bishops Park	Yes	No	No	N/A	Contractor
144	JC Beemer	Yes	No	No	N/A	Contractor
Date: Monday June 24, 2024						
145	Fairfield	Yes	No	No	N/A	No Comment
146	Birch and Burlington	No	Yes	No	3 Hrs	Outreach request
147	Southham	No	Yes	No	2 Hrs	Outreach request
148	Montgomery	Yes	No	No	N/A	Contractor
149	Bayfront	Yes	No	No	N/A	Contractor
150	Wellington Sq	Yes	No	No	N/A	Contractor
151	Delta	Yes	No	No	N/A	Contractor
152	Mountain Dr	Yes	No	No	N/A	Contractor
153	Bishops Park	Yes	No	No	N/A	Contractor
154	JC Beemer	Yes	No	No	N/A	Contractor
Date: Tuesday June 25, 2024						
155-157	Jackie Washington	Yes	No	No	N/A	No Comment
158	Bayfront	Yes	No	No	N/A	No Comment
159	JC Beemer	Yes	No	No	N/A	No Comment
160	Gage	Yes	No	No	N/A	No Comment
161	Delta	Yes	No	No	N/A	No Comment
162	Montgomery	Yes	No	No	N/A	Contractor
163	Bayfront	Yes	No	No	N/A	Contractor
164	Wellington Sq	Yes	No	No	N/A	Contractor
165	Delta	Yes	No	No	N/A	Contractor
166	Mountain Dr	Yes	No	No	N/A	Contractor
167	Bishops Park	Yes	No	No	N/A	Contractor
168	JC Beemer	Yes	No	No	N/A	Contractor
Date: Wednesday June 26, 2024						

168-169	Wellington and Hunter	Yes	Yes	No	2 Hrs	Outreach request
170	Bishops Park	Yes	No	No	N/A	No Comment
171	Mountain Dr	Yes	No	No	N/A	No Comment
172	West 5	No	Yes	No	30 min	Outreach request
173	Trentholm	No	Yes	No	30 min	Outreach request
174	Upper Paradise and Stone Chrch	No	Yes	No	30 min	Outreach request
175	Olympic	No	Yes	No	30 min	Outreach request
176	JC Beemer	Yes	No	No	N/A	No Comment
177	Montgomery	Yes	No	No	N/A	Contractor
176	Bayfront	Yes	No	No	N/A	Contractor
179	Wellington Sq	Yes	No	No	N/A	Contractor
180	Delta	Yes	No	No	N/A	Contractor
181	Mountain Dr	Yes	No	No	N/A	Contractor
182	Bishops Park	Yes	No	No	N/A	Contractor
183	JC Beemer	Yes	No	No	N/A	Contractor
Date: Thursday June 27, 2024						
184	Bayfront	Yes	No	No	N/A	No Comment
185	Fairfield	Yes	No	No	N/A	No Comment
186	Montgomery	Yes	No	No	N/A	No Comment
187	Kennilworth and Lawerance	Yes	No	No	N/A	No Comment
188	Gage	Yes	No	No	N/A	No Comment
189	Jackie Washington	Yes	No	No	N/A	No Comment
190	Wellington Sq	Yes	No	Yes	2 hrs	HPS and By-Law request to be on site for compliance
191	Pinky Lewis	No	No	Yes	2 hrs	HPS and By-Law request to be on site for compliance
192	Montgomery	Yes	No	No	N/A	Contractor
193	Bayfront	Yes	No	No	N/A	Contractor
194	Wellington Sq	Yes	No	No	N/A	Contractor
195	Delta	Yes	No	No	N/A	Contractor
196	Mountain Dr	Yes	No	No	N/A	Contractor
197	Bishops Park	Yes	No	No	N/A	Contractor
198	JC Beemer	Yes	No	No	N/A	Contractor
Date: Friday June 28, 2024						
199	Fairfield	Yes	No	No	N/A	No Comment

July 2024 Daily Encampment Clean ups						
Count	Location	Regular Cleanup	Outreach Email/Request	HPS/By-Law Requested Parks Onsite	Time Spent with HPS/By-law Onsite	Comments
Date: Monday July 1, 2024						
1,6	Bayfront	Yes	No	No	N/A	Clean up For Canada Day Event
Date: Tuesday July 2, 2024						
7	Jackie Washington	Yes	No	No	N/A	No Comment
8	Burlington St and Birch	Yes	No	No	N/A	No Comment
9	Birge	Yes	No	No	N/A	No Comment
10	North Central	Yes	No	No	N/A	No Comment
11	Woodlands	Yes	No	No	N/A	No Comment
12	Fairfield	Yes	No	No	N/A	No Comment
13	Wellington Sq	Yes	No	Yes	3 hrs	HPS and By-Law request to be on site for compliance
14	Montgomery	Yes	No	No	N/A	Contractor
15	Bayfront	Yes	No	No	N/A	Contractor
16	Wellington Sq	Yes	No	No	N/A	Contractor
17	Delta	Yes	No	No	N/A	Contractor
18	Mountain Dr	Yes	No	No	N/A	Contractor

19	Bishops Park	Yes	No	No	N/A	Contractor
20	JC Beemer	Yes	No	No	N/A	Contractor
Date: Wednesday July 3, 2024						
21	Rail Trail	Yes	No	No	N/A	No Comment
22	Woolverton	Yes	No	No	N/A	No Comment
23	Corktown	Yes	No	No	N/A	No Comment
24	Shamrock	Yes	No	No	N/A	No Comment
25	Birge	Yes	No	No	N/A	No Comment
26	Confederation Park	Yes	No	No	N/A	No Comment
27	Stirton Tot Lot	Yes	No	No	N/A	No Comment
28	Liberty and Grange	Yes	No	No	N/A	No Comment
29	Ferguson Station	Yes	No	No	N/A	No Comment
30	Montgomery	Yes	No	No	N/A	Contractor
31	Bayfront	Yes	No	No	N/A	Contractor
32	Delta	Yes	No	No	N/A	Contractor
33	Mountain Dr	Yes	No	No	N/A	Contractor
34	Bishops Park	Yes	No	No	N/A	Contractor
35	JC Beemer	Yes	No	No	N/A	Contractor
Date: Thursday July 4, 2024						
36	Jackie Washinton	Yes	No	No	N/A	No Comment
37	Fairfield Park	Yes	No	No	N/A	No Comment
38	nnilworth and Lawerar	Yes	No	No	N/A	No Comment
39	Gage Park	Yes	No	No	N/A	No Comment
40	Ferguson Station	Yes	No	No	N/A	No Comment
41	Montgomery	Yes	No	No	N/A	Contractor
42	Bayfront	Yes	No	No	N/A	Contractor
43	Delta	Yes	No	No	N/A	Contractor
44	Mountain Dr	Yes	No	No	N/A	Contractor
45	Bishops Park	Yes	No	No	N/A	Contractor
46	JC Beemer	Yes	No	No	N/A	Contractor
Date: Friday July 5, 2024						
48	Fay Park	Yes	No	Yes	2 hrs	HPS and By-Law request to be on site for compliance
49	Olympic	Yes	No	No	N/A	No Comment

50	Queen St	Yes	No	No	N/A	No Comment
51	Jackie Washington	Yes	No	No	N/A	No Comment
52	JC Beemer	Yes	No	No	N/A	No Comment
53	Park and Vine	Yes	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
54	Battlefield Park	Yes	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
55	MacNab st	Yes	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
56	Fay Park	Yes	No	Yes	1 hrs	Outreach request
57	Montgomery	Yes	No	No	N/A	Contractor
58	Bayfront	Yes	No	No	N/A	Contractor
59	Delta	Yes	No	No	N/A	Contractor
60	Mountain Dr	Yes	No	No	N/A	Contractor
60	Bishops Park	Yes	No	No	N/A	Contractor
61	JC Beemer	Yes	No	No	N/A	Contractor
Date: Monday July 8, 2024						
63	Jackie Washington	Yes	No	No	N/A	No Comment
64	Fay Park	Yes	No	No	N/A	No Comment
65	Fay Park	Yes	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
66	Mountain Dr	Yes	No	No	N/A	No Comment
67	Kennilworth and Law	Yes	No	No	N/A	No Comment
68	Fairfield	Yes	No	No	N/A	No Comment
69	John and Rebecca	Yes	No	No	N/A	No Comment
70	Hunter and MacNab	Yes	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
71	Hurst and MacNab	Yes	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
72	Your and Bay	Yes	No	Yes	1 hrs	HPS and By-Law request to be on site for compliance
73	Montgomery	Yes	No	No	N/A	Contractor
74	Bayfront	Yes	No	No	N/A	Contractor
75	Delta	Yes	No	No	N/A	Contractor
76	Mountain Dr	Yes	No	No	N/A	Contractor
77	Bishops Park	Yes	No	No	N/A	Contractor
78	JC Beemer	Yes	No	No	N/A	Contractor

	ONTARIO SUPERIOR COURT OF JUSTICE PROCEEDING COMMENCED AT HAMILTON
	AFFIDAVIT OF CORY MANNING affirmed July 30, 2024
	GOWLING WLG (CANADA) LLP Barristers & Solicitors One Main Street West Hamilton, ON L8P 4Z5 Tel: 905-540-8208 Bevin Shores (LSO#56161F) Tel: 905-540-2468 <i>bevin.shores@gowlingwlg.com</i> Jordan Diacur (LSO#65860E) Tel: 905-540-2500 <i>jordan.diacur@gowlingwlg.com</i> Lawyers for the respondent File Number: H227899

<div>1 Court File No. CV-21-77187</div> <div>2 ONTARIO</div> <div>3 SUPERIOR COURT OF JUSTICE</div> <div>4 B E T W E E N:</div> <div>5</div> <div>6 KRISTEN HEEGSMAN, DARRIN MARCHAND, GORD SMYTH,</div> <div>7 MARIO MUSCATO, SHAWN ARNOLD, BRADLEY CALDWELL,</div> <div>8 CHRISTINE DELOREY, GLEN GNATUK, TAYLOR GOGO-HORNER,</div> <div>9 CASSANDRA JORDAN, JULIA LAUZON, AMMY LEWIS,</div> <div>10 ASHLEY MACDONALD, COREY MONAHAN, MISTY MARSHALL,</div> <div>11 SHERRI OGDEN, JAHMAL PIERRE, LINSLEY GREAVES and</div> <div>12 PATRICK WARD</div> <div>13 Applicants</div> <div>14 - and -</div> <div>15</div> <div>16 CITY OF HAMILTON</div> <div>17 Respondent</div> <div>18</div> <div>19</div> <div>20 --- This is the Examination for Discovery of CORY</div> <div>21 MANNING on his Affidavit sworn July 30, 2024,</div> <div>22 herein, taken via videoconference hosted by Nimigan</div> <div>23 Mihailovich Reporting Inc. on the 27th day of</div> <div>24 August 2024.</div> <div>25</div> <div>NIMIGAN MIHAILOVICH REPORTING INC.</div> <div>1.905.522.1653 info@nmreporting.ca</div>	<div>3</div> <div>1 TABLE OF CONTENTS</div> <div>2 INDEX OF EXAMINATIONS:</div> <div>3 CORY MANNING; Affirmed</div> <div>4 CROSS-EXAMINATION BY MR. CHOUDHRY.....4</div> <div>5</div> <div>6 The following list of undertakings, advisements and</div> <div>7 refusals is meant as a guide only for the</div> <div>8 assistance of counsel and for no other purpose.</div> <div>9</div> <div>10 INDEX OF UNDERTAKINGS</div> <div>11 The questions/requests undertaken are noted by U/T</div> <div>12 and appear on the following page/line numbers:</div> <div>13 None noted</div> <div>14</div> <div>15 INDEX OF ADVISEMENTS</div> <div>16 The questions/requests taken under advisement are</div> <div>17 noted by U/A and appear on the following page/line</div> <div>18 numbers: None noted</div> <div>19</div> <div>20 INDEX OF REFUSALS</div> <div>21 The questions/requests refused are noted by R/F and</div> <div>22 appear on the following page/line numbers: None</div> <div>23 noted</div> <div>24</div> <div>25 NIMIGAN MIHAILOVICH REPORTING INC.</div> <div>1.905.522.1653 info@nmreporting.ca</div>
<div>2</div> <div>1 APPEARANCES:</div> <div>2</div> <div>3 Sujit Choudhry For the Applicants</div> <div>4</div> <div>5 Bevin Shores For the Respondent</div> <div>6</div> <div>7 IN ATTENDANCE:</div> <div>8</div> <div>9 Curtis Sell - CLCYR</div> <div>10 Michelle Sutherland - CLCYR</div> <div>11 Nonye Okenwa - CLCYR</div> <div>12 Sharon Crowe - HCLC</div> <div>13 Liz Marr</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> <div>NIMIGAN MIHAILOVICH REPORTING INC.</div> <div>1.905.522.1653 info@nmreporting.ca</div>	<div>4</div> <div>1 ---Upon Commencing at 12:08 p.m.</div> <div>2 CORY MANNING; Affirmed.</div> <div>3 CROSS-EXAMINATION BY MR. CHOUDHRY:</div> <div>4 1 Q. Mr. Manning, good morning, sir.</div> <div>5 My name is Sujit Choudhry, I've been introduced to</div> <div>6 you already, but for the record I'm just stating</div> <div>7 my name.</div> <div>8 A. Nice to meet you.</div> <div>9 2 Q. Nice to meet you.</div> <div>10 So, Mr. Manning, I have a bit of a</div> <div>11 spiel I give to every witness, so I'm just going</div> <div>12 to provide you with this. Some of it you've</div> <div>13 already heard off the record.</div> <div>14 As you know I am cross-examining you</div> <div>15 on your affidavit which has been filed by the City</div> <div>16 in a court case regarding homeless encampments.</div> <div>17 Your affidavit and this cross-examination will be</div> <div>18 put into evidence before the Court and it's,</div> <div>19 therefore, important that you tell the truth.</div> <div>20 If you'd like me to repeat a</div> <div>21 question, please do. If you would like me to take</div> <div>22 a moment to collect your thoughts to answer a</div> <div>23 question, please take it. You may only have your</div> <div>24 affidavit and exhibits in front of you and no</div> <div>25 other materials or notes. Can you confirm that's</div> <div>NIMIGAN MIHAILOVICH REPORTING INC.</div> <div>1.905.522.1653 info@nmreporting.ca</div>

<p style="text-align: right;">5</p> <p>1 true?</p> <p>2 A. True.</p> <p>3 3 Q. And you are alone in an office</p> <p>4 somewhere?</p> <p>5 A. Correct.</p> <p>6 4 Q. Good. And if I refer you to</p> <p>7 any other evidence or materials I'll put them up</p> <p>8 on the screen for you to look at.</p> <p>9 Do you have any questions about</p> <p>10 those instructions?</p> <p>11 A. No, sir.</p> <p>12 5 Q. Okay. So I just would like to</p> <p>13 put it on the screen. Mr. Manning, --</p> <p>14 A. Yes.</p> <p>15 6 Q. -- do you see this document,</p> <p>16 sir?</p> <p>17 A. Yes, I do.</p> <p>18 7 Q. I'm sorry, I didn't hear you,</p> <p>19 but if you nod it doesn't turn up on the record,</p> <p>20 so you'll have to say "yes".</p> <p>21 A. Yes, I see it.</p> <p>22 8 Q. Good, thank you. And is this</p> <p>23 your -- and so, Mr. Manning, I'm just going to</p> <p>24 take you to the bottom here to look at the date.</p> <p>25 It says that this affidavit was affirmed by you on</p> <p style="text-align: center;">NIMIGAN MIHAIOVICH REPORTING INC. 1.905.522.1653 info@nmreporting.ca</p>	<p style="text-align: right;">7</p> <p>1 A. Somewhere in the same, probably</p> <p>2 maybe a little bit more, or just a bit over 100.</p> <p>3 14 Q. Okay. Sir, when you say:</p> <p>4 "In May 2022 I also, as an added</p> <p>5 responsibility, headed the encampment team for the</p> <p>6 Parks and Cemeteries Section." [All quotes are as</p> <p>7 read].</p> <p>8 Could you please clarify if that's</p> <p>9 in relation to Parks District North only or is it</p> <p>10 with respect to all parks and cemeteries in</p> <p>11 Hamilton?</p> <p>12 A. All parks and cemeteries.</p> <p>13 15 Q. I see. And how many are those?</p> <p>14 How many parks and cemeteries would you estimate</p> <p>15 there are in Hamilton?</p> <p>16 A. There's upwards of 500.</p> <p>17 16 Q. Okay. And in your, in your --</p> <p>18 are you able to estimate in those 500 parks and</p> <p>19 cemeteries -- pardon me, could you repeat your</p> <p>20 answer again, Mr. Manning, I don't want to put</p> <p>21 words in your mouth?</p> <p>22 A. Repeat answer to which</p> <p>23 question?</p> <p>24 17 Q. How many parks and cemeteries</p> <p>25 are there in your estimation?</p> <p style="text-align: center;">NIMIGAN MIHAIOVICH REPORTING INC. 1.905.522.1653 info@nmreporting.ca</p>
<p style="text-align: right;">6</p> <p>1 July 30th, 2024; is that correct?</p> <p>2 A. Yes, correct.</p> <p>3 9 Q. I just would like to ask you a</p> <p>4 few questions about this. So I'm going to take</p> <p>5 you back to the top of the affidavit. Just give</p> <p>6 me a minute, please.</p> <p>7 So, Mr. Manning, I just want to ask</p> <p>8 you a question about paragraph 2. Can you just</p> <p>9 refresh your memory by reading paragraph 2 again</p> <p>10 before I ask you about it.</p> <p>11 A. I'm good, you go ahead and ask</p> <p>12 your questions.</p> <p>13 10 Q. Great. So how many parks are</p> <p>14 there in Parks District North?</p> <p>15 A. I don't have an exact number.</p> <p>16 It's probably anywhere from 80 to 100 parks.</p> <p>17 11 Q. I see. So you would estimate</p> <p>18 that there's between 80 and 100 parks in Parks</p> <p>19 District North?</p> <p>20 A. Correct.</p> <p>21 12 Q. And then prior to that you were</p> <p>22 a superintendent of Parks District West, correct?</p> <p>23 A. Correct.</p> <p>24 13 Q. And could you estimate how many</p> <p>25 parks there are in Parks District West?</p> <p style="text-align: center;">NIMIGAN MIHAIOVICH REPORTING INC. 1.905.522.1653 info@nmreporting.ca</p>	<p style="text-align: right;">8</p> <p>1 A. Across the entire division?</p> <p>2 18 Q. Yes.</p> <p>3 A. Close to 500.</p> <p>4 19 Q. And in those close to 500 parks</p> <p>5 or cemeteries, how many contain encampments, would</p> <p>6 you say?</p> <p>7 A. At this given time?</p> <p>8 20 Q. Yes, sir.</p> <p>9 A. I would say we're in the</p> <p>10 proximity of, known locations, 30, 40.</p> <p>11 21 Q. And how many of those known</p> <p>12 locations, 30 or 40, by your estimate have you</p> <p>13 personally visited?</p> <p>14 A. I would say 80 per cent of</p> <p>15 them.</p> <p>16 22 Q. So could I -- if we could do it</p> <p>17 with mathematics here, so when you're saying 80</p> <p>18 per cent of 30 to 40, that's between 24 --</p> <p>19 A. 20 to 25.</p> <p>20 23 Q. I'm sorry, sir?</p> <p>21 A. 20 to 25 of them.</p> <p>22 24 Q. Okay. And your observations</p> <p>23 are based on your visits to those 20 to 25</p> <p>24 encampments?</p> <p>25 A. My observation is based on per</p> <p style="text-align: center;">NIMIGAN MIHAIOVICH REPORTING INC. 1.905.522.1653 info@nmreporting.ca</p>

<p style="text-align: right;">9</p> <p>1 location. Every one of them is different.</p> <p>2 25 Q. Oh, I see. So what might be</p> <p>3 true in some encampments aren't true in others?</p> <p>4 A. Absolutely.</p> <p>5 26 Q. Could you just explain that,</p> <p>6 what you mean by that a bit more, sir?</p> <p>7 A. Could you ask the question,</p> <p>8 like what are you looking for?</p> <p>9 27 Q. Okay. Let me -- that's fair,</p> <p>10 so let me take you to the next paragraph, which is</p> <p>11 paragraph 3 which is about cleanup. Does the --</p> <p>12 and so you involve -- what is your precise role</p> <p>13 with respect to cleanup in encampments?</p> <p>14 A. I manage the encampment cleanup</p> <p>15 team. So a supervisor and three Parks employees.</p> <p>16 28 Q. Are you able -- I'm sorry,</p> <p>17 could you repeat the last part of your answer?</p> <p>18 A. Yes, I manage a supervisor and</p> <p>19 three Parks staff.</p> <p>20 29 Q. And are you able to comment on</p> <p>21 the work of the cleanup teams or how it varies</p> <p>22 across the 30 to 40 sites you visited?</p> <p>23 A. Sure. What would be your</p> <p>24 question specifically?</p> <p>25 30 Q. The degree of cleanup required;</p> <p style="text-align: center;">NIMIGAN MIHAILOVICH REPORTING INC. 1.905.522.1653 info@nmreporting.ca</p>	<p style="text-align: right;">11</p> <p>1 Monday to Friday.</p> <p>2 37 Q. Okay. And then how about the</p> <p>3 other locations?</p> <p>4 A. Could be one, because some of</p> <p>5 them move, it could be one day a week, it could be</p> <p>6 twice a week. It might not be for, you know --</p> <p>7 again, when I say "week", I'm saying within the</p> <p>8 Monday to Friday timeframe. Sometimes we don't</p> <p>9 get to some locations for seven, eight working</p> <p>10 days. It depends on the site and also how quickly</p> <p>11 they move from their locations.</p> <p>12 38 Q. I see. And so if I could</p> <p>13 summarize, then, so you say sites where you know</p> <p>14 people are, pardon me, encampments that remain in</p> <p>15 the same location you clean up regularly and</p> <p>16 that's daily Monday to Friday, correct?</p> <p>17 A. We clean up, we have a list</p> <p>18 that's a fluid list at times. But, yes, we try to</p> <p>19 for encampments that are located, are not moving,</p> <p>20 yes, we try to get there on a regular basis</p> <p>21 between Monday and Friday. Again, it could be</p> <p>22 five days a week, it could be four, but we're</p> <p>23 within that timeframe, for sure.</p> <p>24 39 Q. And just if I could continue,</p> <p>25 then, and the sites that are not in stable --</p> <p style="text-align: center;">NIMIGAN MIHAILOVICH REPORTING INC. 1.905.522.1653 info@nmreporting.ca</p>
<p style="text-align: right;">10</p> <p>1 how often cleanup is required.</p> <p>2 A. So some locations are cleaner</p> <p>3 than others. Some locations are dirtier than</p> <p>4 others. So some cleanups take 20 minutes, some</p> <p>5 cleanups could take two hours, three hours.</p> <p>6 31 Q. Okay.</p> <p>7 A. It depends on the location.</p> <p>8 32 Q. I see. So it depends.</p> <p>9 A. Correct.</p> <p>10 33 Q. Okay. I want to go down to</p> <p>11 paragraph 6. In paragraph 6 you put in quotes the</p> <p>12 term "regular cleanup"; do you see that?</p> <p>13 A. Mm-hmm, yes, I do.</p> <p>14 34 Q. Could you define what you mean</p> <p>15 by "regular cleanup"?</p> <p>16 A. We have a more consistent</p> <p>17 schedule to visit more regularly to pick up the</p> <p>18 garbage, to keep the sites tidy.</p> <p>19 35 Q. So "regular" refers to the</p> <p>20 frequency of the cleanup?</p> <p>21 A. Correct.</p> <p>22 36 Q. And what would -- and what</p> <p>23 frequency would that be?</p> <p>24 A. Right now we have anywhere from</p> <p>25 six to ten locations that we frequent daily,</p> <p style="text-align: center;">NIMIGAN MIHAILOVICH REPORTING INC. 1.905.522.1653 info@nmreporting.ca</p>	<p style="text-align: right;">12</p> <p>1 pardon me, the encampments that aren't in stable</p> <p>2 locations, you don't clean them up as frequently?</p> <p>3 A. Correct. Most of those</p> <p>4 locations we are told, we get information stating</p> <p>5 that there's a location in a certain spot that has</p> <p>6 been abandoned that we would clean up, yeah.</p> <p>7 40 Q. So you can't clean them up</p> <p>8 regularly because you don't always know where they</p> <p>9 are?</p> <p>10 A. Correct.</p> <p>11 41 Q. And so I just want to take you</p> <p>12 to Exhibit "A" for a minute. Mr. Manning, you're</p> <p>13 able to refer to this if you have it there if you</p> <p>14 would like to.</p> <p>15 A. Yeah, I have it.</p> <p>16 42 Q. Okay. And so this lists some</p> <p>17 cleanups. Could you just describe what this</p> <p>18 information is for me, please?</p> <p>19 A. Sure. We can go with the first</p> <p>20 one there, February 13th, York Parkette, that's</p> <p>21 one of our parks. "Dimitri" is the occupant of</p> <p>22 that location. "Wilson" is the councillor of that</p> <p>23 location. "PN" means Parks North staff. "(1)" is</p> <p>24 just the statement to, it's February 13th, was the</p> <p>25 first cleanup that we did in February.</p> <p style="text-align: center;">NIMIGAN MIHAILOVICH REPORTING INC. 1.905.522.1653 info@nmreporting.ca</p>

<p style="text-align: right;">13</p> <p>1 43 Q. I see. Could you just maybe 2 explain just to help me here, I'm just 3 highlighting the February 22nd entry. It's not 4 highlighting well, but you know what I'm saying. 5 A. So February 22nd we did a 6 cleanup at Hillcrest Park and Woodland's Park. 7 Our staff did the cleanup. 10 and 11 would be the 8 number of cleanups that we have progressed to 9 since February 13th. 10 44 Q. Oh, I see. So these numbers 11 just -- these numbers on the right that I'm 12 highlighting here, 1, 2, 3, 4, 5, 6, 7, et cetera, 13 that's a running count? 14 A. It's just a running total so at 15 the end of the month we can say we cleaned up this 16 many, whatever, a numerical value of locations for 17 the month. 18 45 Q. Okay. And in March this is the 19 same information, or this is the comparable 20 information for March? 21 A. Correct. 22 46 Q. Okay. And then this is the 23 comparable information for April? 24 A. Correct. 25 47 Q. Okay. And May, June, July, I NIMIGAN MIHAIOVICH REPORTING INC. 1.905.522.1653 info@nmreporting.ca</p>	<p style="text-align: right;">15</p> <p>1 see is 2023. A8732 2 52 Q. So these pages are from 2023. 3 This is October 2023? 4 A. Yeah. 5 53 Q. November 2023? 6 A. Yes. 7 54 Q. We'll continue to go through 8 these pages. December, and this is January 2024? 9 A. Yes. 10 55 Q. Okay. And so in January 2024 11 there were 139 cleanups in total, correct? 12 A. Correct. 13 56 Q. Okay. And in February it went 14 down to 58, correct? 15 A. Correct. 16 57 Q. Okay. And then these are, 17 okay, if I understand correctly, these records are 18 simply for March 2024 onward, correct? 19 A. Correct. 20 58 Q. This is Exhibit "B" to your 21 affidavit? 22 A. Yes. 23 59 Q. Okay. That helps, okay. Thank 24 you. 25 So I would like to go back to your NIMIGAN MIHAIOVICH REPORTING INC. 1.905.522.1653 info@nmreporting.ca</p>
<p style="text-align: right;">14</p> <p>1 understand, and August. I see. 2 And now some of -- okay, this 3 begins, just to be clear, this is February 2023, 4 correct? 5 A. This would be, I'm trying to 6 remember now. I'm not sure, I would have to 7 check. 8 48 Q. Well, Mr. Manning, if it helps 9 maybe we can just go through the pages together so 10 we can put dates on these pages, if you can 11 determine. So this page says February, the next 12 says March, the next says April -- 13 A. Yeah. 14 49 Q. -- and then it goes May, June, 15 July, August, September, we're not in September 16 yet, so is it fair to say this is likely September 17 2023? 18 A. Sorry, I'm just scrolling 19 through myself -- 20 50 Q. Of course. 21 A. -- I want to give you the 22 correct information. 23 51 Q. Of course. 24 A. Yes, correct, that would be 25 starting February 2023. The first February you NIMIGAN MIHAIOVICH REPORTING INC. 1.905.522.1653 info@nmreporting.ca</p>	<p style="text-align: right;">16</p> <p>1 affidavit, if I could, just a couple more 2 questions. Paragraph 11, do you see that? 3 A. Yeah. 4 60 Q. You say the following: 5 "I find that my staff and I 6 generally enjoy a good rapport with people living 7 in the encampments." 8 Could you just explain what you mean 9 by good rapport? 10 A. Yeah. Myself and my staff know 11 many of the encamped people's names. They know 12 our names. They know when we show up to do 13 cleanups they help us actually engage and start 14 cleaning up their own sites. We supply them with 15 bags, they put them in locations for us to take 16 away. So I would say we have a good rapport and 17 relationship with the people who are living in 18 encampments. 19 61 Q. So they're cooperative with the 20 cleaning efforts? 21 A. Correct, yes. 22 62 Q. Do they participate in the 23 cleaning efforts with you and members of your 24 team? 25 A. They participate on their own. NIMIGAN MIHAIOVICH REPORTING INC. A4448 1.905.522.1653 info@nmreporting.ca</p>

1 site. We don't allow them to be throwing things
2 into our vehicles or anything like that. They
3 clean up their own sites, put them into bags, then
4 we dispose of them.

5 63 Q. I understand. And so have they
6 ever threatened you?

7 A. No, sir.

8 64 Q. Okay. And I just want to
9 continue down to paragraph 12. You state:
10 "Many of them express that they see
11 their encampment site as their possession."

12 Do you see that?

13 A. Yes.

14 65 Q. Do they say that this
15 encampment site is their private property?

16 A. I would say that they tell us
17 that the possessions that are there on the site is
18 theirs. So items that are on their sites, they
19 look at them as their possessions.

20 66 Q. I see. When you say
21 "possessions that are on the site", what
22 possessions are you referring to, Mr. Manning?

23 A. It could be things that, you
24 know, they have buckets and blankets and clothing
25 and tents. I mean, we could name pretty much
NIMIGAN MIHAIOVICH REPORTING INC.

1.905.522.1653 | info@nmreporting.ca

1 REPORTER'S CERTIFICATE

2
3 I, SHEILA M. FINLAY, CSR, Certified
4 Shorthand Reporter and Commissioner of Oaths within
5 and for the Province of Ontario, certify;

6 That the foregoing proceedings were
7 taken before me at the time and place therein set
8 forth, at which time the witness was put under oath
9 by me;

10 That the testimony of the witness and
11 all objections made at the time of the examination
12 were recorded stenographically by me and were
13 thereafter transcribed;

14 That the foregoing is a true and
15 correct transcript of my shorthand notes so taken.

16
17 Dated this 30th day of August 2024

18
19 *Sheila Finlay*
20

21 [Signed Electronically]

22 SHEILA M. FINLAY, CSR /ACT

23 CERTIFIED SHORTHAND REPORTER/

24 AUTHORIZED COURT TRANSCRIPTIONIST

25 Commission Expires September 1, 2024

NIMIGAN MIHAIOVICH REPORTING INC.
1.905.522.1653 | info@nmreporting.ca

1 anything that's possible that they have on their
2 sites or within their possessions that they view
3 as their possessions, where other people may view
4 it as garbage.

5 67 Q. I see. Mr. Manning, thank you,
6 I think I'm done for today. Thank you very much
7 for your time.

8 A. No problem, thank you very
9 much.

10
11 ---Whereupon examination adjourned at 12:26 p.m.
12
13
14
15
16
17
18
19
20
21
22
23
24
25

NIMIGAN MIHAIOVICH REPORTING INC.
1.905.522.1653 | info@nmreporting.ca

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

**ASHLEY POFF, DARRIN MARCHAND, GORD SMYTH, MARIO MUSCATO
AND SHAWN ARNOLD**

Applicants

- and -

CITY OF HAMILTON

Respondent

AFFIDAVIT OF ROB MASTROIANNI

I, ROB MASTROIANNI, of the City of Hamilton, in the Province of Ontario, MAKE OATH AND SAY:

1. I am an employee of the City Hamilton as such I have knowledge of the matters set out in my affidavit. Where I rely on the information of others, I state the source of that information and verily believe it to be true.
2. I am employed by the City of Hamilton as the Manager of the Residential Care Facilities Subsidy Program & Emergency Shelter Services within the Healthy & Safe Community Department of the City of Hamilton's Housing Services Division. My role includes, among other responsibilities, oversight of the City's Emergency Shelter Services and Housing Focused Street Outreach Team.

A Working Definition of Homelessness

3. It is difficult to precisely define homelessness. The Government of Canada, National Housing Strategy, provides the following definition adapted from the Canadian Definition of Homelessness developed by the Canadian Observatory of Homelessness:

A8735

“Homelessness is the situation of an individual or family who does not have a permanent address or residence; the living situation of an individual or family who does not have stable, permanent, appropriate housing, or the immediate prospect, means and ability of acquiring it.”

4. The Government of Canada, National Housing Strategy, provides the following definition of Indigenous homelessness:

“Indigenous Peoples who are in the state of having no home due to colonization, trauma and/or whose social, cultural, economic, and political conditions place them in poverty. Having no home includes: those who alternate between shelter and unsheltered, living on the street, couch surfing, using emergency shelters, living in unaffordable, inadequate, substandard and unsafe accommodations or living without the security of tenure; anyone regardless of age, released from facilities (such as hospitals, mental health and addiction treatment centers, prisons, transition houses), fleeing unsafe homes as a result of abuse in all its definitions, and any youth transitioning from all forms of care.”

Addressing Homelessness in the City of Hamilton

Shelter Funding

5. The City acts as “system service manager” for homelessness response on behalf the Governments of Ontario and Canada. The City receives federal and provincial funding and contributes its own funding to address homelessness. The City must adhere to the funding guidelines of each funder, however, it is able to determine allocations based on need in the local context.
6. The City’s Housing Services Division administers the funding for services and programs such as Emergency Shelters, the Housing Focused Street Outreach Team, Residential Care Facilities,

A4452

Housing Stability Benefits, Eviction Prevention programs, Rapid Rehousing programs and Intensive Case Management. A8736

7. In many of the scenarios, the City disburses the funds through agreements with community partners. These agreements dictate expected target outcomes for each program and ongoing monitoring of success of the programs. The main agencies that administer emergency shelters in the City are The Good Sheppard, Mission Services and The Salvation Army.
8. The following are the 2020-2021 budget resources allocated for homelessness and emergency shelters available to the City:
 - a. The Federal Government Funding allotment for 2020-2021 through “Reaching Home” is \$5,718,428.
 - b. An additional \$1,000,000 was provided by the Federal Government for 2020-2021 through “Home for Good”.
 - c. The Provincial Government Funding allotment for 2020-2021 through “Community Homelessness Prevention Initiative” (“CHPI”) is \$19,455,174.
 - d. An additional \$2,954,960 comes from the City of Hamilton Levy for 2020.
 - e. In addition to the base funding described above, the City of Hamilton has received COVID-19 related funding to address the needs of the homelessness serving system during the pandemic. The COVID-19 related funding is as follows:
 - i. Reaching Home (Federal) - \$2,651,550;
 - ii. Social Services Relief Fund (SSRF) (Provincial) - \$6,880,800 (the City is currently applying for additional funding from the Province);

A8737

iii. Community Relief Fund - \$345,500.

9. Algorithms are used to determine funding rates and block funding amounts based on number of beds, program spaces, etc.
10. A portion of the CHPI funding is budgeted for hotels. Hotels had traditionally been used to provide shelter for families or women with children when no space was available in a shelter. The City's 2020-2021 Fiscal Budget for hotels is \$800,000. Over last few years, hotel overflow expenses have steadily increased. Actual hotel expenses for 2019-2020 were approximately \$1.5M, well in excess of the available budget.
11. Since the start of COVID-19, in 2020, the City has spent and is committed to spend the following amounts on the shelter system:

Month	Budgetary Commitment
April 2020	\$2,450,449
May 2020	\$2,450,449
June 2020	\$1,642,552
July 2020	\$2,343,237
August 2020	\$1,813,237
September 2020	\$1,153,488
October 2020	\$1,053,488
November 2020	\$976,821
December 2020	\$2,046,821

12. While it was not possible to obtain updated figures in time for the preparation of this Affidavit, the budgetary commitments in 2021 are similar to those in 2020.

Providing Shelter for People Experiencing Homelessness

A4453

A8738

13. The above funding is used to provide a system consisting of various programs to deliver organized and professional services to people experiencing homelessness using best practices and key performance indicators. In Hamilton's homeless-serving system, various agencies work together through "Coordinated Access" to support those experiencing or approaching homelessness to find and maintain appropriate housing and supports.
14. Best practice informing homeless-serving systems identifies Coordinated Access, a client-centered, standardized process for intake, assessment, and referral to housing and other services, as a foundational element to ensure individuals are swiftly matched to the right-level of support based on their needs, preferences and available resources.
15. Through Coordinated Access, data is collected by all City funded shelters using a common software database known as Homeless Individuals and Families Information System ("HIFIS") to ensure that all individuals who are accessing services and who are willing to provide consent to collection of data are known to the system. In this way, the City can track the numbers of people accessing the system, their progress through the system and outcomes as well as provide information on unhoused persons when they move to different shelters in order to expedite the tailoring of services to them.
16. The City uses the data collected to advocate for additional funding, address pressures in specific service areas or needs, adjust programming to meet demand, and ensure a robust response with as many interventions and supports as possible.
17. The data is also used by the City to advocate for partnerships with other sectors (e.g. health care) for supports outside of the services provided through the homelessness/housing funding or system.

A4454

A8739

18. Case management for people experiencing homelessness is tailored to the level of support a person requires. The City uses Vulnerability Index - Service Prioritization Decision Assistance Tool ("VI-SPDAT"), a standard triage tool developed by OrgCode Consulting Inc. (one of the leaders in homelessness programming and development of best practices and tools for the homelessness-serving system) to assess the needs of unhoused people. VI-SPDAT has been largely adopted across the country as one of the most successful assessment tools.

19. A VI-SPDAT assessment identifies four general levels of service:

Acuity Level	Level of Support
0-3	No intervention as individuals typically self-resolve; information sharing on housing units, tenant rights and responsibilities, support with applications.
4-7	Rapid Rehousing Intervention; 6-9 months case management supports; monthly in-home visits, support stabilizing income, support to increase social capital within community. Staff/Client Ratio 1:20-25.
8-12	Intensive Case Management Intervention; 18-24 months support intensive case management supports; regular in-home visits, stabilize income, support maintaining housing unit, facilitate connection to health resources, promote wrap around supports and reconnection with broad community support networks. Staff/Client Ratio 1:15-20.
13+	Permanent Supportive Housing; Average of 3+ years of case management supports; ongoing support with navigating health system, support maintaining tenancy, reintegration into community support networks, development of wrap around supports; and, clinical services to address physical or mental health, intellectual disabilities and/or substance use. Regular in-home visits, after hours crisis support. Staff/Client Ratio 1:8-10.

20. The VI-SPDAT assessment is usually conducted within 14 days of someone accessing the homelessness support system, because evidence shows that many who first enter into the system are able to move to some form of housing within the first 14 days. Based on the results of the assessment, the individual is triaged to the appropriate intervention required.

21. There are no restrictions on shelter access based on acuity.

22. The City's approach to homelessness is grounded in the Housing First Model. In the Housing First Model the priority is obtaining housing and ensuring that appropriate supports are in place to

A4455

address other issues (substance use, mental/physical health, etc.) once housed to maintain tenancy. A8740

23. The City's approach to homelessness includes various programs. These include Homelessness Prevention and Shelter Diversion, Mental Health Street Outreach, Housing Focused Street Outreach, Emergency Shelters, Transitional Housing, Rapid Rehousing, Intensive Case Management and Permanent Supportive Housing. These programs operate as part of a broader social safety net and work to ensure clients have efficient connection to the services and supports required.

24. The City substantially or partly funds all of the above programs, with the exception of Permanent Supportive Housing and the Mental Health Street Outreach team. Permanent supportive housing and Mental Health Street Outreach are, as explained further below, primarily funded by the province or other sources.

25. Homelessness Prevention and Shelter Diversion interventions provide assistance to individuals and families at risk of becoming homeless, before they become homeless. Prevention programs couple financial support (rent and utility arrears, damage deposit etc.) with case management to achieve housing stabilization.

26. Housing Focused Street Outreach Workers provide mobile support services to people who are experiencing homelessness and who may be disconnected from the homelessness-serving system. Outreach workers meet people in the community, helping to make connections to resources and supports and increase collaborations and co-ordination within homelessness support services. Assertive housing-focused street outreach creates and supports connections to safe, sheltered options with a focus on permanent housing. Individuals supported by Outreach are offered a referral to an existing emergency shelter or hotel, based on client choice, and are

offered a referral to Housing First Intensive Case Management Programs (described below), as appropriate and available. A8741

27. Emergency Shelters provide temporary accommodations and essential services for individuals experiencing homelessness so that they may be re-housed. Shelters can play a key role in reducing homelessness as these services focus efforts on engaging participants in the rehousing process.

28. The shelters and shelter system are designed to have a low barrier for access. In emergency shelters and hotels, individuals have access to various supports including but not limited to harm reduction, housing planning, access to medical services and supports to connect individuals to needed services and housing, and access to income support. Shelters also provide access to meals, facilities for personal hygiene, hygiene products, washrooms, laundry facilities, and safety. Outreach staff continue to visit and engage with people that have moved from encampments into shelters and hotels building on the relationship with those clients, and to facilitate ongoing case management with shelter case managers.

29. Emergency Shelters accept admissions 24 hours a day, 7 days a week. Individuals can call shelters to determine if space is available or present themselves at a shelter. If no space is available at that shelter, shelter staff will assist in exploring availability at other shelter locations. The use of the HIFIS database allows shelter staff to see where available spaces exist within their sector (e.g. the Men's, Women's, Family, and Youth sectors).

30. Referrals are made by shelter staff to alternative housing options, where appropriate and based on the individual's need. Each shelter seeks to ensure individuals are diverted to other safe, appropriate options where possible and to ensure admission to a shelter when no other options exist.

A8742

31. Rapid Rehousing is such an option. It provides targeted, time-limited financial assistance and support services for those experiencing homelessness, usually episodically or transitionally, to help them quickly exit emergency shelter services and retain housing. The program targets participants with lower acuity levels using case management and financial supports to assist with the cost of housing. The length of stay is usually less than one year as the program targets those who can live independently after receiving subsidies and support services. The City funds two Rapid Rehousing programs: one through Mission Services with a 2020-2021 target of 133 individuals placed in permanent housing per year and one through the Good Shepherd for women and families with a 2020-2021 target of 87 women and 86 families placed in permanent housing per year.

32. Transitional Housing provides time-limited support designed to move individuals to independent living or permanent housing. The length of stay is limited and typically less than one year, though it can be as short as a few weeks. Such facilities often support those with dealing with addictions and mental health that can benefit from more intensive supports for a period of time before moving to permanent housing. Examples of target groups for this intervention include youth who require modelling of basic life skills or people who have had lengthy histories of institutionalization. Without permanent housing at exit, participants may cycle through time-limited facilities thus, stabilization in permanent housing is essential to ensure successful outcomes.

33. Intensive Case Management (ICM) provides longer-term case management and housing support to higher acuity participants facing long-term homelessness (chronic homelessness), addictions, and mental health issues. ICM programs support clients through regular in-home visits, providing financial support to stabilize income and maintain housing, facilitate connection to health resources, and promote reconnection with broad community support networks. The intervention is designed to serve and achieves the best outcomes with individuals with acuity scores of 8-12. The length of the intervention is generally between 12 and 24 months. The City of Hamilton funds

A4458

A8743

four community agencies to deliver ICM programs, serving self-identified CIS men/women, Trans Masculine/Feminine and non-binary adults:

- a. Mission Services (men) – 2020-2021 target: 80 individuals placed in permanent housing per year
- b. Wesley Urban Ministries (men) – 2020-2021 target: 65 individuals placed in permanent housing per year
- c. The Good Shepherd (women, youth and families) – 2020-2021 target: 146 households placed in permanent housing per year (Families 35, Single Women 77, Youth 34); and
- d. Aboriginal Health Centre, Indigenous Housing Services – 2020-2021 target: 53 individuals placed in permanent housing per year.

34. During the COVID-19 pandemic, the ICM providers have been asked to adjust their caseload to be 1/3 from encampments, 1/3 from shelters, and 1/3 from hotels /shelter overflow. While the particular allocation may have fluctuated over the course of the pandemic, the intention is to ensure that limited ICM program spaces include a specific focus on individuals from encampments.

Supportive Housing and High Acuity Individuals

35. No City-funded program exists to *exclusively* support individuals with the highest level of acuity (13+), though as discussed below, individuals with the highest acuity are able to access City programs. Such individuals typically require assistance that is beyond the funding purview of the City, including assistance of physicians, mental health practitioners, and the Assertive Community Treatment Team (a client centred mental health service that offers a broad range

A4459

of intensive community supports to individuals experiencing serious mental health concerns),
combined with a permanent supportive housing program.

36. Permanent Supportive Housing refers to a combination of housing assistance (e.g., rent-geared-to-income, rent supplements) and the aforementioned support services. Permanent Supportive Housing includes an average of 3+ years of case management supports, ongoing support with navigating the health system, support maintaining tenancy, reintegration into community support networks, development of wrap around supports, and clinical services to address physical or mental health, intellectual disabilities and/or substance use. There are also regular in-home visits and after-hours crisis support. Permanent Supportive Housing does not have a term of coverage (the term is indefinite). Individuals will likely live in this type of housing long term, often for years. This is required due to their level of complexity and need.

37. The aforementioned health supports integral to permanent supportive housing fall outside of the City's authority to fund. Such health supports are funded by the Province and require a municipal partnership with health partners to implement. Supportive Housing is funded primarily through the Province with funds also contributed by the Federal Government.

38. Ontario's supportive housing system includes a complex network of 20 core provincial programs and 12 related programs spread across three (3) ministries, representing a combined investment of approximately \$2 billion annually. Each ministry's programs tends to assist distinct populations:

- a. Ministry of Health (MOH): Mental health and addictions challenges, at-risk seniors, people with physical disabilities, people with acquired brain injuries and people with HIV/AIDS.

- A8745
- b. Ministry of Children, Community and Social Services (MCCSS): People with developmental disabilities, youth, Indigenous people and people experiencing or at risk of experiencing gender based violence and human trafficking.
 - c. Ministry of Municipal Affairs and Housing (MMAH): People experiencing or at risk of homelessness and Indigenous people.
39. Just some of the funding of supportive housing provided by the Province in 2018-2019 includes:
- a. \$252.4 million (MOH) – Mental Health Supportive Housing – Residential Supports within Housing;
 - b. \$46.4 million (MOH) – Rent Supplement Program;
 - c. \$32.2 million (MOH) – Dedicated Supportive Housing;
 - d. \$5.5 million (MMAH) – Indigenous Supportive Housing;
 - e. \$323.7 million (MMAH) – Community Homelessness Prevention Initiative;
 - f. \$50 million (MMAH) – Home for Good;
 - g. \$13.1 million (MCCSS) – Dedicated Supportive Housing;
 - h. \$16.2 million (MCCSS) – Transitional Housing Support; and
 - i. \$2.8 million (MCCSS) – Indigenous Mental Health and Addictions.
40. While it was not possible to obtain updated figures in time for this Affidavit, the 2020-2021 funding is similar to the 2018-2019 figures.

- A8746
41. Notwithstanding the City has no control over funding for programs for high-acuity persons, City-funded programs remain dedicated to supporting high-acuity people who experience homelessness. Although the Intensive Case Management programs are contracted and designed to effectively support those with acuity up to 12, their contracts allow for higher needs individuals to be taken on when approved and requested by the City. The ICM programs have done so at the City's request throughout the encampment response.

The Emergency Shelter System in Hamilton

42. The emergency shelter system in the City of Hamilton is broadly divided into:

- a. the Men's sector;
- b. the Women's sector (which includes women and women with children);
- c. the Family Sector; and
- d. the Youth Shelter.

43. The Men's emergency shelter sector is composed of:

- a. Good Shepherd Men's Centre;
- b. Mission Services Men's Centre;
- c. Salvation Army Booth Centre;
- d. An emergency shelter located at 378 Main Street East (the former Cathedral Boys School) operated by the Good Shepherd; and
- e. Hotels (since COVID-19) operated by Mission Services.

A8747

44. The Women's emergency shelter sector is composed of:

- a. Mary's Place operated by Good Shepherd;
- b. Emma's Place;
- c. St. Joseph's Womankind;
- d. A Hotel (since COVID-19) operated by the Good Shepherd;
- e. Hotels (since COVID-19) operated by Mission Services.

45. More generally, Mission Services operates emergency shelters through hotels for women, men, couples, and shelter overflow.

46. Additionally, the City can place families in hotels, with support from City staff, when required.

47. There are also four Violence Against Women ("VAW") emergency shelters which are not funded through the City, but through the Ministry of Community and Social Services ("MCSS"): Inasmuch House, Interval House, Martha's House and the Native Women's Centre. The City of Hamilton pays for "overflow" beds in each of the four VAW shelters (between 4-6 beds at each location). When the MCSS funded beds are full, if the VAW shelter puts women in those beds, the City pays for the overflow space. If the overflow beds at the respective locations are full, the City will then place that woman/family in a hotel at the City's expense.

48. Carole Anne's Place and Willow's Place are drop-ins serving single women experiencing homelessness.

49. The youth shelter is located at the Good Shepherd Notre Dame.

A4463

50. The Family emergency shelter is located at the Good Shepherd Family Centre. A Hotel also provides rooms to couples with no children.

51. The Wesley Drop-In serves single men and women.

52. Hotels are not named in order to protect the people using them and the hotels.

Increase of Shelter Facilities and Services during COVID-19

53. The COVID-19 pandemic prompted the City to expand its facilities and services in order to address the needs of people experiencing homelessness during the pandemic.

54. The City maintains an isolation centre, currently located at Wesley with approximately 15 beds to serve men and women who need to isolate due to COVID-19; as well as five family townhouse units to serve families who must isolate. Due to distancing requirements, the number of beds for individuals in the family townhouse units can accommodate up to five people per unit, or up to 25 people total.

55. In addition, in consultation with public health, space within existing shelters was reconfigured to maximize capacity while maintaining social distancing. This resulted in the reduction in the number of shelter beds available in some shelters which was compensated for by the expansion of shelter operations into hotels to make up for the loss of shelter beds and to increase shelter capacity during COVID-19 to above the pre-COVID-19 emergency shelter capacity. The City has allocated funding for some of the shelters to make capital improvements in order to return to pre-COVID-10 shelter capacity while maintaining appropriate distancing.

56. The City has ensured food provision for individuals at all hotels and provision of staffing and additional supports to clients receiving emergency shelter in these hotel rooms. All hotels offer

A8748

A4464

ongoing harm reduction support as well as case management support with a focus on housing plans. A8749

57. The City also established a temporary shelter for men with capacity for up to 80 people, operated by Good Shepherd Centres, to compensate for the existing men's shelters reducing capacity to allow for physical distancing. This temporary shelter was initially located at First Ontario Centre and is currently located at located at the former Cathedral Boys School on Main Street East, where it is still able to provide shelter to up to 80 people however currently its capacity is 60 people in accordance with current demand.

The following charts set out the number of beds available in the shelter system in the City			
Location	Pre COVID-19 Beds Available	COVID-19 Beds Available	Change
Mary's Place	25	20	-5
Emma's Place	0	15	15
St. Joseph's Womankind	6	6	0
Hotel (single women)	0	58	58
Good Shepherd Men's Centre	54	19	-35
Mission Services Men's Centre	58	58	0
Salvation Army Booth Centre	82	82	0
Cathedral	0	80	80
Hotel for men and couples	0	84	84
Good Shepherd Family Centre	80	80	0
Hotel (family)	0	100	100
Good Shepherd Notre Dame	21	13	-8
Total	326	615	289

A8750

- 16 -

Men's Sector			
Location	Regular Beds Available	COVID-19 Beds Available	Change
Good Shepherd Men's Centre	54	19	-35
Mission Services Men's Centre	58	58	0
Salvation Army Booth Centre	82	82	0
Cathedral	0	80	80
Hotel	0	84	70
Total	194	323	115

Women's Sector			
Location	Regular Beds Available	COVID-19 Beds Available	Change
Mary's Place	25	20	-5
Emma's Place	0	15	0
St. Joseph's Womankind	6	6	0
Mountainview	15	0	-15
Hotel	0	55	55
Total	46	96	35

Family Sector			
Location	Regular Beds Available	COVID-19 Beds Available	Change
Good Shepherd Family Centre	80	80	0
Hotel (family)	0	100	100
Total	80	180	100

Youth Shelter			
Location	Regular Beds Available	COVID-19 Beds Available	Change
Good Shepherd	21	13	-8

58. In response to the impact of COVID-19 on shelters the City implemented a number of additional measures, including:

- a. providing transportation support for people experiencing homelessness;

A4466

A8751

- b. providing PPE to shelter staff and occupants;
- c. extending drop-in services and hours and length of season for men and women in four locations;
- d. an increase in the in Street Outreach Team by the equivalent of 3.5 full time positions;
- e. a focus by the Street Outreach Team on encampments;
- f. use of rent supplements / Canada Ontario Housing Benefit to fund access to housing units;
- g. providing funding to community organizations for additional peer outreach workers and program supplies;
- h. conducting daily, intensive engagement with a housing focus at encampments through outreach, the Social Navigator Program and other community partners;
- i. conducting bi-weekly case conferences with Intensive Case Managers, Outreach and community partners to assess appropriate housing options and match opportunities with individuals;
- j. initiating contact with Home and Community Care to discuss higher-acuity cases that need more than ICM housing supports;
- k. conducting 3 separate weekly sector calls (Women's; Men's; System wide), in which community organizations are able to participate, to discuss options for collaboration, support, and addressing barriers;
- l. providing flexibility with the Housing Stability Benefit¹;

¹ Housing Stability Benefit is accessible to people in receipt of social assistance (OW/ODSP) and those considered low income. It normally has maximum allowable amounts within the preceding 24-month period (\$800 for single

A4467

A8752

- m. coordinating delivery of more than \$550,000 from the provincial and federal government to 27 local agencies for expenses such as food, enhanced cleaning, Personal Protective Equipment; and
- n. leading weekly calls with partner agencies to identify emerging issues and coordinate responses.

59. In short, the City's approach to encampments during COVID-19 has been to focus on the safety of encampment residents and other residents of the City and to increase efforts to assist in moving encampment residents to sustainable, longer-term housing and appropriate care based on their needs.

60. The City has developed a framework to guide its transition from emergency COVID-19 response to adaption and transformation of its shelter services. A key component of the framework is maintaining the appropriate number of emergency beds currently available. In order to do so, the City has provided funding to:

- a. Good Shepherd Centre Hamilton to set up and operate the former Cathedral Boys School as a temporary shelter for 45 men for the period of September 29, 2020 to June 30, 2021. This facility has changed its capacity based on need, which as noted above is currently 60 beds but can accommodate up to 80. This new facility includes: meals and snacks for all of those accommodated; lounge space; recreational activities; medical services through a nurse practitioner and the Shelter Health Network; harm reduction supports; case management and housing support services; and outreach services provided through other agencies including Ontario Works.

individuals or couples with no children; \$1500 for families). There are also eligible items that an individual can apply for (i.e.: rent arrears; last month's rent deposit; mattresses; utility arrears; etc.). Through COVID, additional flexibility has been granted in that people who may have already received their maximum entitlement have still be granted a benefit and people who have been granted items under exceptional circumstances that are not normally covered (e.g. washing machines).

A4468

A8753

- b. Mission Services to create partitions between beds in their dormitory style room and to create 10 individual rooms. This will allow Mission Services to operate at their original capacity of 58 beds.
- c. renovate the Salvation Army Booth Centre in order to create partitions in the dormitories and single rooms to allow the shelter capacity to return to its original 82 bed limit.

61. The above-referenced reconfiguration of space within existing shelters is to maximize capacity while ensuring social distancing and promoting infection control.

Shelter Space Availability

62. For the month of September 2021, to present, the occupancy levels of the City's Emergency Shelter system may be summarized as follows:

Emergency Shelters

Women's Emergency Shelters: 108%

Family Emergency Shelter: 99%

Youth Emergency Shelter: 61%

Men's Emergency Shelter: 97%

Overflow Locations

Cathedral (men): 38% (of 60 beds)

Hotel (couples & women): 95%

Hotel (Family): equivalent to 100%, placement as needed

Hotel (Women): 89%

63. These figures show that in September 2021 to present, there is room in the men's, youth, and family sectors. There is limited space in the hotel overflow for women and couples.

A4489

A8754

64. When interpreting these figures important to note that bed availability is extremely fluid and changes rapidly, often on an hourly basis. If a person calls for a space at one point in a day, it is possible capacity may change later in the day or the following day.
65. As well, regarding hotel space, at times hotel rooms that would otherwise be available, become temporarily unavailable pending repairs due to damages.
66. When shelter space is not available, there are often other options available, which staff are able to help people pursue, particularly for women; such as overnight drop-in space.
67. With respect to the women's system, the City has provided the largest increase in funding to the women's system over the past few years to meet the growing demand.
68. The City emergency shelter system is able to accommodate couples in the Family shelter, or hotel rooms in the absence of space in Family shelter.
69. The City is continually examining our shelter capacity and looking for opportunities to mitigate some of the demand pressures on the system. For example, the City has recently, as of October 2, 2021, opened a new temporary 15-bed shelter for single women. We continue to explore other opportunities to ensure shelter availability meets the needs of those who wish to access it.

SWORN REMOTELY via Docusign by)
 ROB MASTROIANNI of the City of)
 Hamilton before me at the City of Hamilton)
 during a 'Zoom' videoconference on)
 October 6, 2021 in accordance with)
 O. Reg. 431/20, Administering Oath or)
 Declaration Remotely.)

DocuSigned by:
 Bevin Shores

75E43E7F402846F...

BEVIN SHORES

LSO No. 56161F

Commissioner for Taking Affidavits, etc.

DocuSigned by:
 Rob Mastroianni
 7EAE891483A0474...
 ROB MASTROIANNI

A4470

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT
HAMILTON

AFFIDAVIT OF ROB MASTROIANNI

GOWLING WLG (CANADA) LLP
Barristers & Solicitors
1 King Street W, Suite 1500
Hamilton ON L8P 1A4

Tel: 905-540-8208

Michael Bordin (LSO#40047W)

Tel: 905-540-2492
michael.bordin@gowlingwlq.com

Bevin Shores (LSO#56161F)

Tel: 905-540-2468
bevin.shores@gowlingwlq.com

Jordan Diacur (LSO#65860E)

Tel: 905-540-2500
jordan.diacur@gowlingwlq.com

Lawyers for the respondent

Email for parties served:
Sharon Crowe: crowes@lao.on.ca
Stephanie Cox: coxst@lao.on.ca

A8756

Court File No. CV-21-00077187-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

ASHLEY POFF, DARRIN MARCHAND, GORD SMYTH, MARIO MUSCATO
AND SHAWN ARNOLD

Applicants

- and -

CITY OF HAMILTON

Respondent

**SUPPLEMENTARY AFFIDAVIT OF ROBERTO MASTROIANNI
(SWORN OCTOBER 12, 2021)**

I, ROBERTO MASTROIANNI, of the City of Hamilton, in the Province of Ontario, MAKE
OATH AND SAY:

1. I am employed by the City of Hamilton (the “**City**”) as the Manager of the Residential Care Facilities Subsidy Program & Emergency Shelter Services within the Healthy & Safe Community Department of the City of Hamilton’s Housing Services Division. My role includes, among other responsibilities, oversight of the City’s Emergency Shelter Services and Housing Focused Street Outreach Team (“**Outreach team**”). I have knowledge of the matters set out in my affidavit. Where I rely on the information of others, I state the source of that information and verily believe it to be true.

A4472

A8757

Funding and Budget Resources for Homelessness and Emergency Shelters

2. As an update to paragraph 8 of my October 6, 2021 Affidavit, the 2021-2022 budget resources allocated for homelessness and emergency shelters available to the City are:

- (a) The Federal Government Funding allotment for 2021-2022 through “Reaching Home” is \$10,424,159.
- (b) The Provincial Government Funding allotment for 2021-2022 through “Community Homelessness Prevention Initiative” (“CHPI”) is \$19,645,911.
- (c) An additional \$1,000,000 was provided by the Provincial Government for 2021-2022 through “Home for Good”.
- (d) An additional \$4,459,180 comes from the City of Hamilton Levy for 2021.
- (e) In addition to the base funding described above, the City of Hamilton has received COVID-19 related funding for 2021-2022 to address the needs of the homelessness serving system during the pandemic. The COVID-19 related funding is as follows:
 - (f) Social Services Relief Fund (SSRF) (Provincial) - \$26,124,538.

3. As an update to paragraph 11 to my October 6, 2021 Affidavit, since the start of COVID-19, in 2020, the City has spent and is committed to spend the following amounts on the shelter system:

A4473

A8758

Month	Budgetary Commitment
April 2020	\$2,450.449
May 2020	\$2,450,449
June 2020	\$1,642.552
July 2020	\$2,343,237
August 2020	\$1,813,237
September 2020	\$1,153,488
October 2020	\$1,053,488
November 2020	\$976,821
December 2020	\$2,046,821
January 2021	\$3,820,871.33
February 2021	\$2,092,268.45
March 2021	\$(1,232,443.98)
April 2021	\$3,149,755.32
May 2021	\$2,720,072.83
June 2021	\$2,072,940.68
July 2021	\$3,734,045.08
August 2021	\$1,722,524.23
September 2021	\$2,170,836.06
October 2021	\$3,671,153.97
November 2021	\$1,576,126.03
December 2021	\$1,576,126.03

4. I note that March 2021 total shows a credit, which is due to past-month costs being adjusted across different account sections, where costs stayed in their correct months, but the offsetting credit was applied in March (the fiscal year end).

Shelter Occupancy

5. Attached hereto and marked as **Exhibit "A"** to this my Affidavit is a chart summarizing the shelter occupancy rates from January 2021 and September 2021. The spaces per night indicate capacity, with the exception of hotel overflow for families, which

A4474

A8759

is not a static number as the hotels are booked on an as needed basis. The occupancy percentages indicate the average occupancy percentage of the available shelter or hotel capacity for the particular month. For example, in September the 81 women's shelter spaces were at 90% capacity. This means that the women's shelter spaces were full 90% of the time. I also note that the hotel overflow for families does not have a set capacity. The figures in Exhibit A are the number of unique individuals served per month.

6. Because we do not have a set number of hotel rooms/beds booked in the families hotel (which is different from the way we block book rooms in the other hotels), we cannot produce an average occupancy. Because there is not a set number of rooms, there is no comparator, so the occupancy percentage would in essence always be 100%. For example, if we had 2 families for the hotel, we call the hotel ad hoc and place those two families, resulting in 100% occupancy. Similarly, if we place 30 families in hotel, the same ad hoc booking occurs and it still results in 100% occupancy.

7. Individuals are first referred to permanent shelter locations and only referred to hotels where there is no space in the shelters, or where the particular individual is not able to be admitted to the shelters (i.e.: a Service Restriction, conflict of interest, etc.). For example, where a single woman wants to access a shelter space, we first refer to all emergency shelters. If the shelters are full, an assessment for space at the wholly 'female hotel overflow' is completed. If that is full, then an assessment for space at the 'couples, men, and women hotel overflow' is completed. There have been occasions where no space was available at hotels or shelters.

A4475

A8760

8. In paragraph 69 of my affidavit sworn October 6, I referenced the new 15 bed women's shelter opened as of October 2, 2021. This increases the capacity of the women's shelter segment by 15 beds. This temporary shelter is approved to operate for up to 2 years from the date of opening. The City is currently exploring plans for a further women's emergency shelter site.

Duration of Encampments

9. In the time frame between October 2020 and before September 2021, the City, of its own volition, implemented a By-Law Enforcement Protocol (the "**Protocol**") which permitted encampments to remain in certain areas for up to 14 days provided there were no health or safety concerns presented by the encampment. The Protocol was the result of a negotiated resolution of an interlocutory injunction obtained by encampment supporters in July 2020. However, the City was not obligated to follow the Protocol indefinitely. At a meeting that took place on August 9, 2021, Hamilton City Council decided to no longer follow the Protocol.

10. Thereafter, following a three week wind-down, effective August 30, 2021 the City implemented the six step Encampment Process pursuant to the Encampment Response Update (PED21188/HSC20038(c)) (the "**Encampment Process**").

11. During the time period in which the Protocol was in effect, in most cases, occupants of the encampments remained in place longer than 14 days. This was the case notwithstanding that 14 days was the maximum time that was permitted under the By-Law Enforcement Protocol that was then in place. This timeline was the result of a number of factors.

A4476

A8761

12. Since the City's implementation of the Encampment Process the only sites that have been removed were those situated on prohibited grounds, as defined under the Protocol.

13. I have been advised by staff that 9 encampment sites were visited this past weekend which were also visited the weekend before. The number of tents has increased at eight of these sites. One has had a decrease in tents. Two weekends ago there were 34 tents at the sites, this past weekend there were 51 tents, representing an increase in 17 tents.

Level of Interaction Between Outreach and Municipal Law Enforcement ("MLE")

14. Not all encampments that the Outreach team is aware of and engages with are reported immediately to MLE. In effect, this means that, at any given time, there are encampments of which Outreach is aware, but not MLE.

15. Since the City's implementation of the Encampment Process, MLE notifies the Outreach team after MLE receives a complaint about an encampment and has attended an encampment and given the occupants notice (if the occupants did not voluntarily leave). After receiving this information, the Outreach team goes to the encampment and engages with the occupants. However, sometimes the Outreach Team may have already been aware of the encampment and was already engaging with the occupants by the time MLE received a complaint. So, in many situations, the Outreach Team is already engaging and working to support the occupants by the time MLE attends the encampment.

A4477

A8762

The Applicants were offered housing and accessed our programs

16. The Outreach team takes notes of the individuals that we assist. These notes are made during the outreach team's day-to-day work and are recorded in the City's HIFIS system (the homelessness sector's database) and in excel tracking tools available to the outreach staff. Based on the information we have, we have identified all five applicants as having had assistance from us or other support programs with which we engage and having been offered housing and/or emergency shelter. In some situations, the client refused the offers of support.

17. The Applicant Ashley Poff was in contact with our outreach team two times in 2021. According to our records, Ms. Poff frequented a downtown health centre and accessed overnight drop-ins for women. Ms. Poff was accepted into a transitional housing program in early spring 2021 and accessed drop-in programs during the day. To our knowledge, Ms. Poff was not staying in any encampments identified through the Encampment Process.

18. According to our records, Outreach has had a few encounters with the Applicant Darrin Marchand. The notes from Outreach state that Mr. Marchand stayed at three different encampments and sometimes at a shelter. As well, he would occasionally stay with his brother. In July 2021, he stayed in a park for two days. In August 2021, he stayed in a park for one day. According to our records, Mr. Marchand has a trespass order with one shelter due to an assault, but is still able to access shelter beds in other shelters. As of October 7, 2021, he was staying with his brother.

A4478

A8763

19. Regarding the Applicant Gord Smyth, according to our records he lost housing in June 2021 and Outreach offered him shelter but he declined, as it did not allow pets. The Outreach team also offered him fostering for his pet, but he declined that as well. The Outreach team also offered Mr. Smyth a housing subsidy, but he refused to complete the necessary forms. As such, he did not receive the housing subsidy. Mr. Smyth was also connected to a housing worker. He completed the necessary forms, but said he would not take the unit because of hydro costs. The housing worker planned to arrange to have the hydro paid directly to the utility company. However, Mr. Smyth declined this. Outreach and Housing staff offered pet friendly housing, at an amount Mr. Smyth was willing to pay for rent, as well as offering support while in housing. Mr. Smyth refused all options. Mr. Smyth completed an application for a low barrier unit one month ago. Our records indicate that Mr. Smyth became aggressive towards outreach staff and housing staff. As of September 2021, the Social Navigator Program has been following up with Mr. Smyth.

20. The Outreach team connected with the applicant Mario Muscato around July 2020 while he was staying at an encampment. When the Ferguson Avenue encampment was cleared, Outreach team were informed Mr. Muscato was moving into a Residential Care Facility. Between August 2020 and approximately April 2021, Mr. Muscato had been accessing Indigenous Housing Services. However, as of June 2021, Mr. Muscato was discharged from Indigenous Housing Services because their Outreach program staff had been unable to contact him for three months. As of October 7, 2020, Mr. Muscato was staying in a shelter.

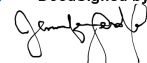
21. The Applicant Shawn Arnold has spent over a year and a half in encampments, according to the Outreach team's notes. He connected with our services roughly six

A4479

A8764

months ago. He missed four appointments with our housing worker and viewed two residential units, which he declined. However, as of October 4, 2021, Mr. Arnold has secured a unit and the housing worker is waiting for him to pick up his key. Mr. Arnold is eligible to continue receiving support with the housing worker for the next two years.

SWORN by Roberto Mastroianni of the City of Hamilton, in the Province of Ontario, before me at the City of Hamilton, in the Province of Ontario, on October 12, 2021 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:

D4D9283B860B4FE...

Commissioner for Taking Affidavits

**JENNIFER ASHLEY GEE SEIDEL
(82920W)**

DocuSigned by:

7FAFB91483A0474...

ROBERTO MASTROIANNI

RCP-E 4D (February 1, 2021)

A4480

A8765

This is **Exhibit "A"** to the Affidavit of Rob Mastroianni sworn remotely at the City of Hamilton, before me at the City of Hamilton, in the Province of Ontario on October 12, 2021, in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:



D4D9283B860B4FE...

JENNIFER ASHLEY GEE SEIDEL
Commissioner for Taking Affidavits
(or as may be)

		Beds	Beds	Beds	Room s	Rooms	Rooms
		Women's Sector	Men's Sector	Youth Sector	Famil y Sector	Hotel (overflow for couples , women, and men)	Hotel (overflow for families)
January 2021	Spaces/Night	81	196	13	20	98	
	Occupancy %	91%	91%	32%	90%	45%	34*

*Number of unique individuals served

February 2021	Spaces/Night	81	196	13	20	98	
	Occupancy %	91%	99%	45%	99%	67%	27

A4481

A8766

March 2021	Spaces/Night	81	223	13	20	118	
	Occupancy %	92%	93%	59%	91%	76%	52

April 2021	Spaces/Night	81	223	13	20	118	
	Occupancy %	98%	88%	66%	88%	63%	38

May 2021	Spaces/Night	81	223	13	20	118	
	Occupancy %	89%	81%	44%	78%	47%	51

June 2021	Spaces/Night	81	223	13	20	118	
	Occupancy %	91%	79%	40%	87%	51%	57

A4482

A8767

July 2021	Spaces/Night	81	210	13	20	118	105
	Occupancy %	101%	85%	49%	90%	66%	

August 2021	Spaces/Night	81	210	13	20	82	134
	Occupancy %	90%	81%	63%	93%	97%	

September 2021	Spaces/Night	81	210	13	20	82	134
	Occupancy %	90%	81%	61%	99%	95%	

A4483

<div>ONTARIO</div> <div>SUPERIOR COURT OF JUSTICE</div> <div>PROCEEDING COMMENCED AT</div> <div>HAMILTON</div>	
<div>SUPPLEMENTARY</div> <div>AFFIDAVIT OF ROBERTO MASTROIANNI</div>	
<div>GOWLING WLG (CANADA) LLP</div> <div>Barristers & Solicitors</div> <div>1 King Street W, Suite 1500</div> <div>Hamilton ON L8P 1A4</div> <div>Tel: 905-540-8208</div> <div>Michael Bordin (LSO#40047W)</div> <div>Tel: 905-540-2492</div> <div>michael.bordin@gowlingwlq.com</div> <div>Bevin Shores (LSO#56161F)</div> <div>Tel: 905-540-2468</div> <div>bevin.shores@gowlingwlq.com</div> <div>Jordan Diacur (LSO#65860E)</div> <div>Tel: 905-540-2500</div> <div>jordan.diacur@gowlingwlq.com</div> <div>Lawyers for the respondent</div>	

Court File No. CV-21-00077187-0000

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

ASHLEY POFF, DARRIN MARCHAND, GORD SMYTH, MARIO MUSCATO AND
SHAWN ARNOLD
Applicants

- and -

CITY OF HAMILTON
Respondent

* * * * *

This is the Cross-Examination of **ROBERTO MASTROIANNI** on his affidavit as sworn on the 6th day of October, 2021 and on his supplementary affidavit as sworn on the 12th day of October, 2021, taken under oath via Zoom Video Conference on Wednesday, the 13th day of October, 2021.

* * * * *

A P P E A R A N C E S:
(VIA ZOOM)

STEPHANIE COX
SHARON CROWE
Hamilton Community Legal
Clinic
- Counsel for Applicants

JORDAN DIACUR
BEVIN SHORES
Gowling WLG
- Counsel for Respondent

MARC BEEBE
- Observer

1		<u>UNDER ADVISEMENTS</u>	
2	<u>U/A NO.</u>		<u>PAGE NO.</u>
3	1	20
4	2	20

5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

* * * * *

NOTE: The above-noted indices are provided for ease of reference only and are not to be relied upon in any manner whatsoever.

1 --- UPON COMMENCING AT 10:35 a.m.

2 ROBERTO MASTROIANNI,

3 having been affirmed,

4 was cross-examined and testified as follows:

5 BY MS. CROWE:

6 1 Q. Okay, Mr. Mastroianni, first of all,
7 can I call you Rob?

8 A. Yes, you can. For sure.

9 2 Q. Thank you. Okay, so we're going to go
10 through some parts of your two affidavits. We'll start
11 off with HIFIS. So my understanding is that is the
12 system that provides information about shelter capacity.

13 Would you agree that there is sometimes
14 a disconnect between what is reported as availability in
15 HIFIS and what is reported to you in terms of
16 availability from frontline workers?

17 A. I don't necessarily agree that there's
18 a disconnect between what is in HIFIS for our capacity.
19 All of our agencies are contracted and mandated to have
20 capacity logged in HIFIS, so all of our available beds
21 and spaces are created and exist in HIFIS. So anybody
22 that's booked into an agency is recorded in HIFIS.

23 So if there is a -- if there is a
24 disconnect, my -- my perspective on that is that it
25 would -- the disconnect is between whether or not the

1 person that staff person may be engaging with has signed
2 consent to have their information recorded in our
3 database.

4 3 Q. Okay. So would you agree then that
5 there are incidents that HIFIS is showing that there
6 should be capacity, but shelter workers are -- and I can
7 see you now -- are reporting that they're having trouble
8 finding space for an individual?

9 A. I would agree that that's the case.
10 I think the context behind that though is that there are
11 times when our system may show that there are a small
12 number of rooms where capacity exists, but you're not
13 able to admit somebody into that space, such as a hotel,
14 maybe one or two rooms, because the room may be offline
15 due to damages or repairs or things that need to happen.
16 And we don't have the ability to take, to remove a room
17 in a hotel, for example, for a day or two while it's
18 offline being repaired and then put it back into the
19 system. It just remains and just doesn't get used for a
20 day or two until it's repaired.

21 4 Q. Okay, thank you. Can you give us a
22 sense in real terms who's actually updating HIFIS
23 throughout the day to show availability?

24 A. So it is active and live in real-time
25 in all of our agencies. So all of our shelters,

1 drop-ins with city staff. So as people are admitted
2 into a location, the staff in that location are
3 responsible for having the consent signed with the
4 individual and inputting their information into our
5 HIFIS database.

6 So it's agency staff predominantly that
7 are doing that. And there could be a delay at times,
8 depending upon whether or not they are inputting in
9 real-time. So it might be that person is admitted right
10 now, but it takes them a half an hour to get to
11 inputting it into HIFIS because of other competing
12 priorities for our staff at that agency.

13 5 Q. Right. And I think that's a fair
14 comment with respect to competing priorities.

15 Would you agree that the shelter staff
16 who are responsible for updating HIFIS are quite busy on
17 an average day?

18 A. I would agree. They have a number of
19 competing priorities.

20 6 Q. Right. And has that -- have those
21 competing priorities intensified during Covid?

22 A. I would say intensity of work for all
23 staff has likely intensified during Covid, but I would
24 say at the same time to try to help mitigate that, the
25 city has been providing additional support stages to

1 help mitigate the pressures.

2 7 Q. Okay. And if staff are feeling quite
3 busy, and you mentioned there might be some competing
4 priorities. And then you mentioned in Paragraph 64 of
5 your affidavit that capacity can actually fluctuate hour
6 by hour. And it's possible that there could actually be
7 several times in any given day where HIFIS -- what's
8 showing in HIFIS isn't actually accurate or reflective
9 of what's available.

10 A. I wouldn't -- I wouldn't say that. I
11 would say there that predominantly staff are inputting
12 in real-time because it's actually, we don't
13 necessarily, staff don't necessarily use paper copies of
14 anything, and then -- like they don't track somebody's
15 details, like a client's details on paper and then go
16 and input it into HIFIS. It literally is active at the
17 front desk of every shelter and multiple computers and
18 access for staff. So it is predominantly live
19 real-time. I'd say that the occurrences of there being
20 a delay is few and far between.

21 8 Q. Okay. The staff who are responsible
22 for inputting this data into HIFIS, do you have a sense
23 of what their other responsibilities are?

24 A. So in a shelter setting, they would be
25 case management staff. So they're the staff that are

1 doing admissions, they're doing case management, they're
2 interacting with all the other individuals in the
3 shelter, and responsible for day-to-day operations.

4 9 Q. Okay. And do you have a sense of what
5 the ratio is between shelter staff and residents?

6 A. It's different at every location
7 because every location is, is -- every shelter location
8 is a different size number of beds and demographic.
9 So it's different at every location, but there's --
10 I couldn't necessarily say exactly what the ratio is
11 without --

12 10 Q. Okay, thank you.

13 A. -- investigating further.

14 11 Q. Thank you. So at Paragraph 21 of your
15 affidavit you indicated that there are no restrictions
16 at -- and accessing shelters based on someone's acuity.
17 But would you agree that it is harder for shelters to
18 serve high acuity individuals?

19 A. I would agree that it is difficult to
20 serve higher acuity individuals, particularly those that
21 are 13 plus, but I wouldn't say that we do not serve
22 them. I would say that that is the gap between what a
23 shelter is set up and intended to provide service for
24 demographic-wise, and the individuals that present. So
25 it is complicated, but it happens on a daily basis.

1 12 Q. And would you be -- would you agree
2 that the behavior of some high acuity individuals can
3 sometimes lead to shelter restrictions that prevent them
4 from accessing shelter?

5 A. I would say that, yeah, I would say
6 that at times, the behaviors that are exhibited as a
7 result of many factors the individual may be presenting
8 with may result in behaviors that are difficult to
9 manage in a congregate setting. And staff work with
10 that individual to try to mitigate the behaviors. But
11 at times, it does result after multiple warnings or
12 conversations and ways to try to address those items, it
13 does result in a service restriction at times.

14 13 Q. Thank you. At Paragraph 29 of your
15 affidavit you stated that individuals can call for
16 shelter beds and they can receive help from shelter
17 staff in accessing a bed.

18 But isn't it true it's not always that
19 easy, that sometimes outside advocates have to intervene
20 and advocate to management or people such as yourself?

21 A. Yeah, I would say that that does happen
22 at times. But again, I would say that complexity of the
23 shelter system is, and the reality of that is that I may
24 be calling for space because of somebody that I'm
25 dealing with in the moment, but at the same time there

1 are a number of other people calling for a space.
2 So it's not necessarily that flow through isn't
3 happening and that somebody is not being admitted, it
4 just may be that at the time that I'm calling, that
5 there is no space available.

6 14 Q. Okay. So you mention that there's no
7 city funding program that exclusively supports high
8 acuity individuals. And those high acuity individuals
9 typically require many levels of supports like doctors
10 or mental health supports. Would you agree that there's
11 a shortage of those types of additional supports
12 available?

13 A. Yes, so essentially what -- essentially
14 what we know is and what we advocate for is additional
15 supports from different levels of government, different
16 sectors such as healthcare for what we would refer to as
17 permanent supportive housing or housing with supports.
18 So those spaces are limited within the City of Hamilton,
19 and funded through multiple different avenues. And we
20 know that the number of people that meet that criteria
21 for a higher level of supportive housing outweighs the
22 number of spaces that we have in our system. So, so,
23 yeah, the need is greater than what we have in place.

24 15 Q. Thank you. I want to turn to the
25 shelter capacity that you've listed starting at

1 Paragraph 62 of your affidavit.

2 A. Okay.

3 16 Q. So you have different occupancy levels
4 listed for the various shelters, but these occupancy
5 levels don't reflect or they don't account for a period
6 where a shelter is, for example, in outbreak. Is that
7 correct?

8 A. No, it would account for the same time
9 period. So when a shelter goes into outbreak, that --
10 that's all reflected in HIFIS. So if there is a pause
11 in admissions during an outbreak, that would be
12 reflective in the number of people that are actually
13 staying in the shelter.

14 17 Q. Right. So for the purposes of
15 accepting new people, new residents, if a shelter is in
16 an outbreak, the capacity could actually go from
17 thirty-eight percent to zero. Is that accurate?

18 A. We've not had a situation where
19 capacity has gone to zero. The only thing that has
20 happened is that during an outbreak, based on public
21 health recommendation and advice and direction, we pause
22 admissions at a site that is in outbreak. So if there
23 is -- so if it's an 80-bed facility and there are 70
24 people there right now, the 70 people are able to
25 remain, it's just those other 10 vacant beds that we

1 have to pause admissions to.

2 18 Q. Right. Thank you. Yes, that's what
3 I was getting at.

4 And the numbers with respect to
5 capacity don't reflect service restrictions, correct,
6 like someone's ability to access shelter based on
7 whether or not they have any service restrictions?

8 A. No, somebody's service restriction
9 history is captured in a different way, it's not
10 captured in capacity.

11 19 Q. I'm sorry, very bad timing for this
12 audio to break up. Can you repeat that, please.

13 A. Yeah. Somebody's service restriction
14 history is captured in our database in a, in a different
15 way, it's not captured under capacity.

16 20 Q. Okay. But in real terms if someone is
17 service restricted from a particular shelter for
18 example, regardless of the capacity, they wouldn't be
19 able to access that facility during this -- the period
20 of the service restriction; is that correct?

21 A. Not -- they're not able to access the
22 location under which they have -- with which they have a
23 service restriction, but they can still access other
24 locations where they don't have a service restriction.

25 21 Q. Correct. Okay. And the numbers that

1 you've listed don't -- wouldn't reflect times where a
2 hotel room for example isn't available because it's been
3 damaged and is undergoing repairs?

4 A. I'm sorry, can you repeat that.

5 22 Q. So the numbers with respect to capacity
6 doesn't reflect a point in time where a hotel room is --
7 has been damaged, is unavailable while it's under
8 repair?

9 A. No, it does reflect that. Capacity
10 does reflect where there may be a room available but is
11 offline due to required things such as repairs. It is
12 captured in capacity.

13 23 Q. Right, what I'm getting at is a point
14 of time ability to access a hotel or a shelter space
15 isn't necessarily reflective of general capacity when
16 for that moment it's unavailable because of a reason
17 like a hotel room being under repairs.

18 MS. SHORES: I'm sorry, Counsel, I
19 don't -- it's Bevin Shores speaking -- I don't understand
20 that question. Can you rephrase.

21 BY MS. CROWE:

22 24 Q. What I'm trying to -- what I'm trying
23 to get at is that in real terms, if a hotel room for
24 example is under repairs that following some damage
25 that that room, that spot is not accessible for that

1 period of time.

2 A. That is correct, it's not accessible,
3 so that -- that's where, that's where for example a --
4 an occupancy -- there's a difference between capacity
5 and occupancy. So an occupancy statistic would say, you
6 know, it's at 98 percent occupancy, but you're not
7 available -- but all rooms are -- all available rooms
8 are filled. That may mean that there is one room that
9 is offline for a day or two while it is pending repairs.
10 So instead of showing, and you can't admit somebody to
11 that room, so instead of showing 100 percent occupancy,
12 it shows 99 percent occupancy. But the number of times
13 that a room is offline is minimal.

14 25 Q. Okay. Rob, I'm going to ask you to
15 explain that distinction in more detail, the difference
16 between occupancy versus capacity.

17 A. So capacity is the set number of spaces
18 in a location. And occupancy is the average number of
19 times all of those spaces are filled. So when you look
20 at a men's shelter that has 82 beds, 82 is their
21 capacity. The average of how, when that location is
22 filled might equate to 95 percent capac-- or occupancy.

23 26 Q. Okay. Thank you, that's helpful.
24 Sorry, just one moment, please. Sorry about that, we're
25 just trying to deal with some of the glitches.

1 A. No problem.

2 27 Q. Okay. We'll move on. Okay, so I'm
3 going to move on to your supplementary affidavit.
4 You mentioned under the previous encampment protocol
5 that there was a 14-day maximum time period of someone
6 being allowed to remain in an encampment. But in fact
7 under that previous protocol, high acuity individuals
8 were not subject to a 14-day maximum, correct?

9 A. High acuity individuals, as long as
10 they were not -- as long as they were not in a
11 prohibited site, could stay longer than 14 days,
12 correct. So if they were abiding by the other terms of
13 the protocol, they were able to stay longer than
14 14 days.

15 28 Q. Okay. And if there were other special
16 circumstances, so for example a lack of shelter
17 capacity, the 14-day minimum might not have been
18 applied, correct?

19 A. That's correct. We obviously take, try
20 to take a person-centered approach from our outreach
21 perspective and engagement perspectives all the time.
22 So if the person is continuing to work with us and
23 engaging with us, we would always take the approach of
24 trying to do what's best for that individual and not
25 necessarily take it as a hard line of 14 days if, if

1 that's feasible.

2 29 Q. Thank you. You stated that under the
3 new encampment process, that some people had been
4 removed from prohibited grounds. How do you define
5 remove, who were removed?

6 A. How do I define removed, sorry? Is
7 that the question?

8 30 Q. Right. Right.

9 A. So either the outreach staff, MLE
10 staff, social navigator, a combination of folks have
11 engaged with the individuals and explained to them that
12 they are encamping in a prohibited site, and looking for
13 voluntary compliance. Explaining that this is a
14 prohibited site and -- and they unfortunately can't
15 remain there, and asking them to move to a different
16 location. Or accept shelter space, other options that
17 we're trying to offer to them.

18 31 Q. And that prohibited site that you're
19 referring to, are you talking about something that was
20 considered a prohibited location under the previous
21 encampment protocol --

22 A. Yes.

23 32 Q. -- or do you simply -- okay.

24 A. Yeah, so the -- under the previous
25 protocol where it was a heritage site, heritage

1 designation, that kind of thing, that's what I'm
2 referring to.

3 33 Q. Okay. And what is your -- you use the
4 language of a unique individual. What is your
5 definition of a unique individual?

6 A. So some of our -- the ways we capture
7 data is that there's a difference between a unique
8 individual and the number of stays, for example. So I
9 may access, I as a -- I am captured in our database as a
10 unique individual. However, I may access space in a
11 program in a shelter on a number of occasions. So for
12 example, in a given month I'm captured once as a unique
13 individual, but if I went in and out of a location on
14 four different times, four different occurrences, I'm
15 captured as a stay or an engagement on four different
16 locations. And that's how we -- that's how we ensure
17 that there's not -- that there's accuracy in the number
18 of people accessing our system and not duplication.

19 34 Q. Sorry, what is the -- what's the
20 threshold for someone to be considered unique versus a
21 stay or engagement?

22 MS. SHORES: No, Counsel, that's not
23 what he said.

24 MS. CROWE: Okay --

25 MS. SHORES: There was no threshold

1 that he described. That was not his evidence. That's
2 not what he said.

3 BY MS. CROWE:

4 35 Q. Okay, I guess I'm going to ask you,
5 Rob, then to provide a little bit more of an
6 explanation, as I'm not quite understanding the working
7 definition of a unique individual.

8 A. So every, every unique person accessing
9 service is captured as a unique individual. So I am
10 recorded in our HIFIS database as a unique person
11 because there's only Rob, one Rob Mastroianni with a
12 certain date of birth and a Social Insurance Number of
13 "X". So I am a unique person. So I'm not confused or,
14 or counted as a different person when I access the
15 system, so I am a unique individual, but when I access
16 service at different locations, it gets recorded as a
17 different stay or a different engagement with an agency
18 or a different service that was provided to me.

19 So if in the course of a month --

20 36 Q. Okay.

21 A. -- I access, you know, I might go in
22 and out of a shelter three times, I'm counted as having
23 stayed in a shelter three times but I'm still only one
24 person having done that.

25 37 Q. So is this akin to saying client or is

1 there like a meaningful distinction there?

2 THE REPORTER: I'm sorry, ma'am, that
3 question was broken up, the beginning. Might you repeat
4 that, please.

5 BY MS. CROWE:

6 38 Q. Is this akin to saying client, using
7 the term client, or is there like a meaningful
8 distinction?

9 A. It could be akin to using the term
10 client. It's, we refer to it as a unique individual
11 so we see -- it's about ensuring that there is not a
12 duplication in recording the number of people accessing
13 service. So it's about our data reliability. That's
14 how we ensure it doesn't look like two people trying to
15 access shelter when it was only twice trying to, like
16 staying in a shelter.

17 39 Q. Okay. Thank you. Do you know the
18 VI-SPDAT scores for the applicants?

19 A. Not off the top of my head, no.

20 40 Q. You have access to them?

21 A. If I needed -- if I needed to pull the
22 information, I could access that information, yes.

23 MS. CROWE: Will the city provide all
24 VI-SPDATs done for the applicants since March 2020 --

25 MS. SHORES: What's --

1 MS. CROWE: -- by -- no?

2 MS. SHORES: I said what's the
3 relevance of that, but you were about to finish your
4 question, I interrupted you, so I apologize. What was
5 the timing you were looking for, Counsel?

6 MS. CROWE: Since March 2020.

7 MS. SHORES: Again, what's the
8 relevance of that?

9 MS. CROWE: Well it speaks to the
10 acuity of the individual, the applicants, the appropriate
11 supports, the amount of engagement that would have been
12 necessary and appropriate.

13 MS. SHORES: Rob, what's the amount
14 of work that would be involved in pulling the VI-SPDAT
15 scores for each of the named applicants from March 2020?

16 THE DEPONENT: I could take that back
17 and investigate how --

18 MS. SHORES: Well --

19 THE DEPONENT: -- it shouldn't be
20 overly complicated, but I don't know how quickly I could
21 get it for you. But it would be possible.

22 MS. SHORES: Yeah, Counsel, I'll need
23 to take that under advisement because I don't know if I
24 can commit to something without knowing what's involved
25 in getting that information to you, especially in light

1 of the very tight timelines we have.

2 U/A NO. 1:

3 MS. CROWE: Okay. We appreciate
4 that. Just to clarify, we'd be looking for the scores
5 themselves, as well as the corresponding paperwork to
6 show how the scores were arrived at.

7 MS. SHORES: Again, that's taken
8 under advisement.

9 U/A NO. 2:

10 MS. CROWE: Thank you.

11 BY MS. CROWE:

12 41 Q. Rob, when a VI-SPDAT is done, would you
13 agree that the best practice is that the VI-SPDAT be
14 re-done each time an individual is moved?

15 A. No. So the best practice is that the
16 VI-SPDAT is completed again when there has been a --
17 it's termed as like a significant change in their --
18 in their situation. So a VI-SPDAT could have been
19 completed with somebody when they were housed through an
20 ICM program. It doesn't necessarily mean that it is --
21 it is done every time that person moves.

22 So it's not, our practice is not to
23 complete a VI-SPDAT over and over again. It's when
24 there is a significant change in their situation.

25 Am I frozen?

1 THE REPORTER: No, I believe it's the
2 counsel --

3 THE DEPONENT: Okay.

4 THE REPORTER: -- asking the
5 questions.

6 MS. SHORES: I'm going to send a text
7 in the chat.

8 THE REPORTER: Okay. Shall we just
9 go off the record?

10 MS. SHORES: Please.

11 **--- OFF THE RECORD AT 11:14 a.m.**

12 BY MS. CROWE:

13 42 Q. Okay, so I just want to take you back
14 to your original affidavit, Rob, for a moment, where we
15 were looking at a breakdown of supports that would be
16 required for someone who, for example, had an H212 score
17 on a VI-SPDAT. And you've indicated that they would
18 need about 18 to 24 months of assistance to support them
19 with housing goals. Does that sound right?

20 A. So the intention of the VI-SPDAT is to
21 do an assessment on an individual to be used as a guide
22 or a tool to help staff determine what would be the best
23 course of action or the best type of intervention to
24 best suit that person's needs.

25 So when somebody scores between an

1 8 to 12, that's an indication that the best course of
2 action is that, that intervention. So that should be
3 what they -- that can be what they concentrate their
4 efforts on in trying to link that person up with
5 supports under that category or that intervention.

6 43 Q. Okay. And then someone who is say a 13
7 plus, that intervention of supports go up to a period of
8 three years plus, correct?

9 A. Normally because somebody that is a 13
10 plus normally what is best for them is their --
11 is housing with supports or permanent supportive
12 housing.

13 44 Q. Okay. Thank you. So the majority of
14 homeless people who are being housed are going into the
15 private market; is that correct?

16 A. I wouldn't be able to speak to that, I
17 can't say that's the majority of people being housed, I
18 don't -- I don't have those figures.

19 45 Q. Would you agree that it can be more
20 difficult to house high acuity individuals?

21 A. I would say it's not necessarily more
22 difficult, it is that they -- the space for the type of
23 intervention that required -- they require is again, as
24 I mentioned earlier, the number of people requiring that
25 type of intervention would outweigh what potentially

1 exists right now.

2 46 Q. Okay. Thank you. Those are my
3 questions.

4 MS. SHORES: All right, Rob, so we're
5 concluded with your examination.

6

7 --- CROSS-EXAMINATION CONCLUDED AT 11:19 a.m.

8

9 * * * * *

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1
2 I hereby certify that the foregoing is a full,
3 true, and correct transcription of all of my stenographic
4 notes to the best of my ability so taken at the Zoom Video
5 Conference Cross-Examination of **ROBERTO MASTROIANNI** on
6 Wednesday, the 13th day of October, 2021.
7
8
9

10 CERTIFIED BY:

11
12 *Christina Schmitz*

13 _____
14 Christina Schmitz, CSR, RPR

15 Certified Stenographic Reporter
16 Registered Professional Reporter

17 Commissioner of Oaths (Expires May 12, 2024)
18
19
20

21 Absence of this certification and original signature is
22 indication this document has been reproduced without the
23 permission of Nimigan Mihailovich Reporting Inc., and, as
24 such, is not an original document.
25

A8793

Court File No. CV-21-00077187-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

KRISTEN HEEGSMA, DARRIN MARCHAND, GORD SMYTH, MARIO
MUSCATO, SHAWN ARNOLD, BRADLEY CALDWELL, CHRISTINE
DELOREY, GLEN GNATUK, TAYLOR GOGO-HORNER, CASSANDRA
JORDAN, JULIA LAUZON, AMMY LEWIS, ASHLEY MACDONALD, COREY
MONAHAN, MISTY MARSHALL, SHERRI OGDEN, JAHMAL PIERRE,
LINSLEY GREAVES and PATRICK WARD

Applicants

-and-

CITY OF HAMILTON

Respondent

APPLICATION UNDER 14.05 OF THE *RULES OF CIVIL PROCEDURE*

AFFIDAVIT

I, Roberto Mastroianni, of the City of Hamilton, in the Province of Ontario, AFFIRM:

1. I am an employee of the City Hamilton as such I have knowledge of the matters set out in my affidavit. Where I rely on the information of others, I state the source of that information and verily believe it to be true.
2. I am employed by the City of Hamilton as the Manager of Homelessness & Housing Support within the Healthy & Safe Community Department of the City of Hamilton's Housing Services Division. My role includes, among other responsibilities, oversight of the City's Emergency Shelter Services, Drop-Ins, and Housing Emergency Fund.
3. I make this affidavit as an update and supplement to my October 6, 12 and 15, 2021 affidavits in this proceeding.¹

¹ All defined terms in my October 6, 12 and 15, 2021 affidavits have the same meaning in this affidavit.

A4509

A8794

4. I have reviewed my October 6, 2021 affidavit and confirm that the following paragraphs remain accurate:

- Paragraphs 3-7, regarding the working definition of homelessness and overview of the City's role as the "system service manager" for homelessness response;
- Paragraphs 8-12, regarding budget allocation resources, though updated figures for the period subsequent to my October 6, 2021 affidavit are provided below;
- Paragraphs 13-25, regarding how funding is used to provide a homelessness-serving system consisting of various programs to deliver organized and professional services to people experiencing homelessness using best practices and key performance indicators, including use of the Vulnerability Index - Service Prioritization Decision Assistance Tool ("**VI-SPDAT**") standard triage tool—and I re-emphasize that there are no restrictions on shelter access based on an individual's acuity;
- Paragraphs 26-34, regarding the Housing Focused Street Outreach Team, Emergency Shelters, Referrals, Rapid Rehousing, Transitional Housing, and Intensive Case Management, save that I provide below updated numbers regarding these programs for the period subsequent to my October 6, 2021 affidavit;
- Paragraphs 35-41, regarding supportive housing and high acuity individuals, save that I provide below updated numbers regarding these programs for the period subsequent to my October 6, 2021 affidavit;
- Paragraphs 42-52, regarding the Emergency Shelter System, save that I provide below updated numbers regarding these programs for the period subsequent to my October 6, 2021 affidavit, particularly with respect to changes to the hotel overflow portion of the Emergency Shelter System due to the conclusion of COVID-19 funding from the provincial and federal governments; and

A4510

A8795

- Paragraphs 62-69, regarding Shelter Space Availability, save that updated occupancy figures are provided below and that subsequent developments have affected the temporary shelter referenced in paragraph 69.

5. I have reviewed my October 6, 2021 affidavit and confirm that the following paragraphs do not remain accurate:

- Paragraphs 53-61, regarding COVID-19 funding and programs.

6. I have reviewed my October 12 and 15, 2021 affidavits, and the statements therein were accurate as of the time they were made. The statements therein continue to be true with respect to the Encampment Process that was put in place as of August 30, 2021, which remained in place and operated as I stated in my October 12 and 15, 2021 affidavits until August 23, 2023 and the advent of the presently-enacted Encampment Protocol. The presently-enacted Encampment Protocol replaced the former Encampment Process. Below, I provide updated information regarding the individual Applicants drawn from the City's HIFIS system (the homelessness serving sector database) and Excel-spreadsheet tracking tools kept by City staff.

Budget Resources Update

7. The following are the 2024-2025 budget resources allocated for homelessness and emergency shelters available to the City:

- a. The Federal Government Funding allotment for 2024-2025 through the "Reaching Home" program is \$9,569,020;
- b. The Provincial Government Funding allotment for 2024-2025 through the "Homelessness Prevention Initiative" ("HPP") is \$27,895,500;
- c. An additional \$28,484,312 comes from the City of Hamilton tax levy ("**Levy**") for 2024-2025; and

A4511

d. In addition to the base funding described above, the City of Hamilton has received one-time funding to address the needs of the homelessness serving system during the 2023-2024 Winter Season through the Federal “Reaching Home” program in the amount of \$1,594,565.00.

8. A portion of the provincial HPP funding is budgeted for hotels. Hotels have traditionally been used to provide shelter for families or women with children when no space was available in a family shelter. The City’s 2023-2024 Fiscal Budget within HPP for hotels is \$2,200,000. Over last few years, hotel overflow expenses have steadily increased. Actual hotel expenses for 2022-2023 were approximately \$6,000,000.00, well in excess of the available budget. As a result of increased demand on hotel overflow, the City approved an additional \$3,340,548 in Levy funding for the 2024 calendar year, bringing the total amount allocated to hotel overflow pressures to over \$5,500,000.00.

9. Since the start of COVID-19, in 2020, the City, and the federal and provincial governments, have spent and are committed to spend the following amounts on the shelter and homelessness system in Hamilton (this does **not** include budget resources dedicated to the Hamilton Housing Focused Street Outreach Team and Encampment Response Team, or social housing programs or Residential Care Facilities, referenced below):

Funding Cycle	Federal Funding	Provincial Funding	City Levy Funding
2020 Calendar (Jan-Dec)			\$2,807,287
Apr 2020 - Mar 2021 Fiscal	\$14,314,695	\$26,537,209	
2021 Calendar (Jan-Dec)			\$10,742,690
Apr 2021 - Mar 2022 Fiscal	\$21,656,467	\$22,923,982	
2022 Calendar (Jan-Dec)			\$13,214,255
Apr 2022 - Mar 2023 Fiscal	\$11,578,364	\$15,289,525	
2023 Calendar (Jan-Dec)			\$13,885,582
Apr 2023 - Mar 2024 Fiscal	\$10,246,340	\$11,505,862	
2024 Calendar (Jan-Dec)			\$28,484,312
Apr 2024 - Mar 2025 Fiscal	\$9,569,020	\$11,769,089	

10. The City now utilizes both HPP and Levy funding to operate the Housing Emergency

A8797

Fund (“**HEF**”) program. HEF formally launched July 1, 2024 as a modernized program which replaces the long standing Housing Stability Benefit (HSB) and Rent Ready (RR) programs. HEF provides financial support to individuals and families in receipt of Social Assistance (i.e. Ontario Works and/or Ontario Disability Support Program) or those living with a low income, in order to stabilize their housing or secure new housing. Funds are issues toward last months’ rent deposits, rental arrears, utility arrears, etc. The total budget for HEF is \$8,585,097, with \$1,000,000.00 coming from HPP funding and the remaining \$7,585,097 from Levy funding.

11. Part of the funding for supportive housing in Hamilton is provided by the Province of Ontario. This includes funding through several government programs, administered through several ministries: (a) Ministry of Health (Mental Health Supportive Housing – Residential Supports within Housing; Rent Supplement Program; and Dedicated Supportive Housing); (b) the Ministry of Municipal Affairs and Housing (Indigenous Supportive Housing; Community Homelessness Prevention Initiative; Home for Good) and (c) the Ministry of Children, Community and Social Services (Dedicated Supportive Housing; Transitional Housing Support; and Indigenous Mental Health and Addictions). Social housing can be accessed by submitting an Access to Housing application. City staff and shelter providers assist individuals with completing Access to Housing applications.

12. Notwithstanding that the City has no control over funding for programs for high-acuity persons, City-funded programs remain dedicated to supporting high-acuity people who experience homelessness. Although these Intensive Case Management (“**ICM**”) programs are contracted out and designed to effectively support those with acuity up to 12, the contracts allow for higher needs individuals to be taken on when approved and requested by the City. The ICM programs have done so at the City’s request throughout the encampment response.

13. At present, the City-funded emergency shelter system is divided into:

A4513

A8798

- a. the Men's sector;
- b. the Women's sector (which includes women and women with children);
- c. the Family Sector; and
- d. the Youth Shelter.

14. The City-funded Men's emergency shelter sector is composed of:

- a. Good Shepherd Men's Centre;
- b. Mission Services Men's Centre; and
- c. Salvation Army Booth Centre.

15. The City-funded Women's emergency shelter sector is composed of:

- a. Mary's Place operated by Good Shepherd;
- b. Emma's Place operated by Mission Services;
- c. St. Joseph's Womankind;
- d. West Avenue, a temporary shelter operated by Good Shepherd.

16. The City also licences an extensive system of Residential Care Facilities ("**RCFs**"), which provide safe and affordable supportive housing in a communal setting for people who require assistance with the daily activities of life. At present, there are over 90 licenced RCFs operating in Hamilton. Through Housing Services, the City operates the Residential Care Facility Subsidy Program, which provides financial support to approximately 750 individuals per month to reside in the above-noted spaces, supporting their permanent housing solution. The City utilizes

A4514

A8799

approximately \$8,600,00.00 of the HPP Funding toward the Residential Care Facility Subsidy Program. Many RCFs serve both men and women. Some specialize in serving those with mental illnesses, addictions and/or disabilities. Some specialize in serving youth or seniors.

17. There are also charities and service providers who offer temporary shelter programs in Hamilton of various sizes that are not tracked or funded by the City. One example is the YMCA, which I am aware offers 174 beds for men at its James St. facility—and has continued to shelter same, despite a recent fire that occurred there. Another example is the YWCA, which operates a Transitional Living Program including temporary housing for women at its MacNab St. facility.

18. Additionally, the City can place families in hotels on an *ad hoc* basis to address capacity pressures within the family system. This is supported by City staff, as well as a temporary on-site case management support team, contracted through Good Shepherd. The City contracts with hotels for a total of 52 rooms and accommodates as many families as possible within those rooms, based on family size.

19. There are also four Violence Against Women (“**VAW**”) emergency shelters operating in Hamilton which are not funded by the City, but through the Ministry of Children, Community and Social Services (“**MCCSS**”): Inasmuch House, Interval House, Martha’s House and the Native Women’s Centre. The City of Hamilton pays for “overflow” beds in each of the four VAW shelters (between 4-6 beds at each location). When the MCCSS funded beds are full, if the VAW shelter puts women in those beds, the City pays for the overflow space. If the overflow beds at the respective locations are full, the City will then place that woman/family in a hotel at the City’s expense.

20. Carole Anne’s Place and Willow’s Place operate as “drop-in” facilities serving single women experiencing homelessness.

A4515

A8800

21. The Hamilton Regional Indian Centre also operates a drop-in program specifically serving individuals who identify as Indigenous and who choose to seek service from an Indigenous agency.
22. The youth shelter is located at the Good Shepherd Notre Dame facility.
23. The Family emergency shelter is located at the Good Shepherd Family Centre. A Hotel also provides rooms to couples with no children.
24. Wesley Urban Ministries provides housing support workers to those experiencing homelessness.
25. Hotels retained for overflow purposes are not named in order to protect the people using them and the hotels.
26. The following chart sets out the change in the number of beds available in the City-managed emergency shelter system in the City of Hamilton between 2020 and June 2024:

Location	Early 2020	Early 2024	Change
Mary's Place	25	25	0
Emma's Place	15	15	0
St. Joseph's Womankind	6	6	0
Good Shepherd Men's Centre	54	54	0
Mission Services Men's Centre	58	58	0
Salvation Army Booth Centre	82	86	+4
Good Shepherd Family Centre	80	80	0
Hotel (family)	N/A	208	+208
Good Shepherd Notre Dame	21	21	0
Good Shepherd West Ave	0	20	+20
Salvation Army (added through Winter Response)	0	10	+10
Mission Services (added through Winter Response)	0	35	+35
Total	341	618	+277

A4516

A8801

27. A table setting out the total number of City-funded shelter beds, organized by month from January 2020 to June 2024, as prepared by my staff on July 15, 2024, is attached hereto and marked as **Exhibit “A”**. I confirm that I have reviewed the document and that it is accurate.

28. For the month of June 2024, to present, the occupancy levels of the City-funded emergency shelter system may be summarized as follows:

Emergency Shelters

City-funded Men’s Emergency Shelters: 107%

City-funded Women’s Emergency Shelters: 101%

City-funded Family Emergency Shelter: 100%

City-funded Youth Emergency Shelter: 72%

29. The City-funded Youth emergency shelter sector has capacity available, and the City-funded Women’s, Men’s and Family emergency shelter sectors have overflow capacity available. When interpreting these figures important to note that bed availability is extremely fluid and changes rapidly, often on an hourly basis. If a person calls for a space at one point in a day, it is possible capacity may change later in the day or the following day.

30. When City-funded shelter space is not available, there are often other options available, which staff are able to help people pursue—particularly for women, such as overnight drop-in space.

31. With respect to the women’s system, the City has provided the largest increase in funding to the women’s system over the past few years to meet the growing demand.

32. The City emergency shelter system is able to accommodate couples in the Family

A4517

shelter, or hotel rooms in the absence of space in Family shelter.

33. The City is continually examining our shelter capacity and looking for opportunities to mitigate some of the demand pressures on the system. We continue to explore other opportunities to ensure shelter availability meets the needs of those who wish to access it. For example, City Council has recently approved staff recommendations to complete a Call for Applications (“**CFA**”), assessing the feasibility of adding additional emergency shelter spaces in Hamilton’s emergency shelter system, with a report back to Council in Fall 2024 with results. The CFA will assess the addition of the following emergency shelter spaces: Families – 200 more spaces; Men’s Singles – 110 more spaces; Women’s (Singles) – 50 more spaces; Couples – 55 more spaces (i.e. an additional 110 total new spaces).

Annual Winter Response Strategy

34. Beginning with the 2023/2024 Winter Season, the City implemented an Annual Winter Response Strategy that seeks to address capacity pressures in the emergency system through the cold winter months. De-coupled from previous practice of relying on emergency shelters to go into over-capacity when the Medical Officer of Health declares an Extreme Cold Weather Alert, this annual winter response strategy ensures additional services are in place on a nightly basis from December 1 through March 31, annually. These additional services include:

- a. Warming Spaces operated through expanded hours of operation and Statutory holiday coverage at 3 designated City of Hamilton Recreation Centres;
- b. Warming Spaces operated through statutory holiday coverage at the Hamilton Public Library’s Central Branch;
- c. 100 additional day-time drop-in spaces;

- d. 35 additional overnight drop-in spaces;
- e. Expanded hours of operation at 2 drop-in centres, resulting in 24 hour operations; and
- f. A Warming Bus running nightly from 11:00pm on a set route through the City operated through Hamilton Transit, with on-site Outreach staff providing support for individuals accessing service.

The Individual Applicants

35. City staff take notes regarding the individuals that we assist. As noted above, these notes are recorded in the City's HIFIS system (i.e. the homelessness sector's database) and in Excel-spreadsheet tracking tools. Based on the information we have, we have identified all 19 Applicants as having obtained some assistance from the City-funded system or other support programs with which we engage, and each either obtained or has been offered housing and/or emergency shelter. In some cases, the Applicant has refused the offers of support.

36. The Applicant, Kristen Heegsma, engaged with a Wesley Urban Ministries caseworker in March, 2022. She submitted an Access to Housing application on March 3, 2023. According to City records, she is presently housed and has been since December 1, 2023.

37. The Applicant, Darrin Marchand, is presently housed and has been since October 25, 2023, according to City records.

38. The Applicant, Gord Smyth, submitted an Access to Housing application on March 9, 2021. According to City records, he is presently housed and has been since November 19, 2021.

39. The Applicant, Mario Muscato, last engaged with the City-funded system in February,

A8804

2024. He has not submitted an Access to Housing application, but has engaged with the Hamilton Regional Indian Centre on Ottawa St. for housing support. It is not clear whether he has obtained housing through the Hamilton Regional Indian Centre, as the City is not privy to those records.

40. The Applicant, Shawn Arnold, has connected with an Intensive Case Management worker at Wesley Urban Ministries. According to City records, he is presently housed and has been since January 18, 2024.

41. The Applicant, Allen Bradley Caldwell, is deceased. He passed away on September 15, 2023. He briefly engaged with the City-funded system in 2021 and stayed in a hotel space. He did not submit an Access to Housing application.

42. The Applicant, Christine Delorey, stayed in a City-funded hotel space from October 21, 2020 to March 19, 2021, and as of March 20, 2021 stayed in a space at Mary's Place. As of January, 2023, she had departed from Mary's Place. According to City records, she has not interacted with the City-funded system since that time. She did not submit an Access to Housing application.

43. The Applicant, Glen Gnatuk, is deceased. He passed away on January 5, 2024. He resided on Bold St. in Hamilton until January 31, 2022. He engaged with a Wesley Urban Ministries caseworker in February, 2022, and thereafter obtained housing in Orillia, Ontario and then in Barrie, Ontario. As he was residing outside the City, his HIFIS file was deactivated in July, 2023.

44. The Applicant, Taylor Gogo-Horner, was the spouse of Glen Gnatuk. She resided on Bold St. in Hamilton until January 31, 2022. She engaged with a Wesley Urban Ministries caseworker in February, 2022, and obtained housing in Orillia, Ontario and then in Barrie,

A4520

A8805

Ontario with Mr. Gnatuk. As she was residing outside the City, her HIFIS file was deactivated in July, 2023.

45. The Applicant, Cassandra Jordan, resided in housing in Hamilton from May 1, 2016 to January 22, 2024, at which time she reported having lost housing due to a relationship breakdown. According to City records, she has since engaged with a YWCA drop-in centre and Mary's Place, operated by Good Shepherd, but has not made an Access to Housing application.

46. The Applicant, Julia Lauzon, is presently housed and has been since February 1, 2021, according to City records.

47. The Applicant, Ammy Lewis, is presently housed and has been since October 1, 2021, according to City records.

48. The Applicant, Ashley MacDonald, is presently housed and has been since October 1, 2020, according to City records.

49. The Applicant, Corey Monahan, made an Access to Housing application in July, 2020, and was formerly housed in 2020-2021. He thereafter engaged with both Wesley Urban Ministries and Good Shepherd. During his interactions with both organizations in 2022, he was temporarily service restricted due to bringing a weapon (knife) onto the property, aggressive conduct towards staff, and violence towards others staying in shelter. He last interacted with the City-funded system in February, 2023, according to City records, at which time he refused to communicate further with the Salvation Army Booth Centre.

50. The Applicant, Misty Marshall, was assisted by the City's Housing Focused Street Outreach Team in applying for Ontario Works financial support in June, 2022. She did not submit an Access to Housing application. She subsequently interacted with Willow's and

A4521

A8806

Emma's Place in August, 2023. According to City records, she has not interacted with the City-funded system since that time.

51. The Applicant, Sherri Ogden, was offered shelter on March 22, April 1 and April 7, 2022, but refused. Subsequently, she made an Access to Housing application and obtained housing on September 28, 2022. She presently remains housed, according to City records.

52. The Applicant, Jahmal Pierre, was housed in Hamilton in 2020-2021, and moved to different housing in 2022. Most recently, they have obtained supportive housing through Good Shepherd and have been housed since June 1, 2023, according to City records.

53. The Applicant, Linsley Greaves, was offered shelter on March 30, 2022, but declined. In May, 2022, he indicated to the Housing Focused Street Outreach Team that he was working with a housing caseworker, but subsequently interacted with the City-funded system at each of the men's Misson Services, Good Shepherd and Salvation Army facilities.

54. The Applicant, Patrick Ward, submitted an Access to Housing Application and was offered housing on November 9, 2022. He declined at that time, but he was ultimately housed on June 26, 2023. According to City records, he remains housed at present.

AFFIRMED by Roberto Mastroianni at the City of Hamilton, in the Province of Ontario, before me on July 31, 2024 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:
Jordan Diacur

7AA828F6DBEC4C2...

Commissioner for Taking Affidavits
(or as may be)

Jordan Diacur (LSO 65860E)

DocuSigned by:
Rob Mastroianni

4D99726EBD5242B

ROBERTO MASTROIANNI

A4522

A8807

This is **Exhibit "A"** to the Affidavit of Roberto Mastroianni
affirmed at the City of Hamilton, in the Province of Ontario,
before me on July 31, 2024, in accordance with O. Reg. 431/20,
Administering Oath or Declaration Remotely.

DocuSigned by:

Jordan Diacur

7AA836F6DBEC4C2...

JORDAN DIACUR (LSO 65860E)

A4523

Maximum Number of City-Funded Shelter Beds Available by Month by Sector, City of Hamilton January 2020-June 2024

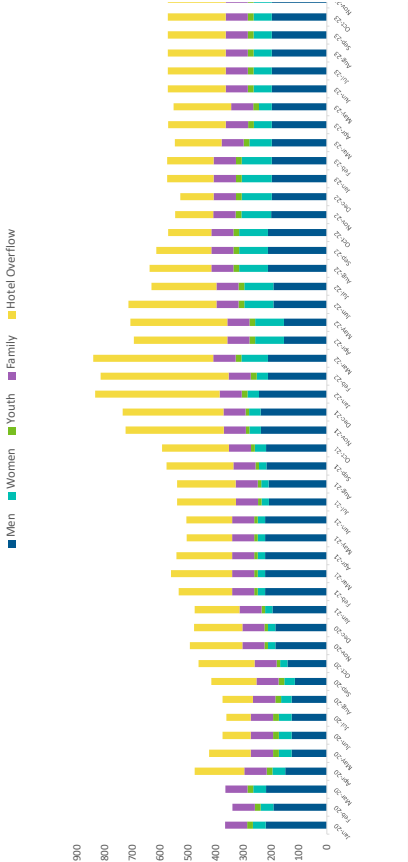
Month	Men	Women	Youth	Family	Hotel Overflow
Jan-20	220	46	21	80	
Feb-20	193	46	21	80	
Mar-20	219	46	21	80	
Apr-20	150	46	21	80	179
May-20	127	46	21	80	150
Jun-20	127	46	21	80	102
Jul-20	127	46	21	80	88
Aug-20	127	38	21	80	110
Sep-20	115	38	21	80	162
Oct-20	142	26	13	80	202
Nov-20	186	26	13	80	189
Dec-20	196	26	13	80	174
Jan-21	223	26	13	80	161
Feb-21	223	26	13	80	192
Mar-21	223	26	13	80	220
Apr-21	223	26	13	80	200
May-21	223	26	13	80	163
Jun-21	223	26	13	80	165
Jul-21	209	26	13	80	212
Aug-21	210	26	13	80	211
Sep-21	218	26	13	80	241
Oct-21	219	41	13	80	241
Nov-21	238	41	13	80	354
Dec-21	239	41	13	80	363
Jan-22	245	41	21	80	448
Feb-22	212	41	21	80	462
Mar-22	212	96	21	80	433
Apr-22	154	104	21	80	337
May-22	193	104	21	80	349
Jun-22	193	104	21	80	318
Jul-22	193	104	21	80	234
Aug-22	212	104	21	80	222
Sep-22	212	104	21	80	198
Oct-22	212	104	21	80	155
Nov-22	201	107	21	80	138
Dec-22	198	109	21	80	120
Jan-23	198	109	21	80	168
Feb-23	198	109	21	80	168
Mar-23	198	81	21	80	168
Apr-23	198	65	21	80	208
May-23	198	46	21	80	208
Jun-23	198	66	21	80	208
Jul-23	198	66	21	80	208
Aug-23	198	66	21	80	208
Sep-23	198	66	21	80	208
Oct-23	198	66	21	80	208
Nov-23	198	66	21	80	208
Dec-23	243	66	21	80	208
Jan-24	243	66	21	80	208
Feb-24	243	66	21	80	208
Mar-24	243	66	21	80	208
Apr-24	243	66	21	80	208
May-24	243	66	21	80	208
Jun-24	243	66	21	80	208

Prepared by Housing Services Division, City of Hamilton, July 15, 2024

Note: Maximum beds are identified as the maximum available funded beds for the month. When there was no maximum number of beds documented (e.g. Sandman Hotel) or no maximum number of beds designated (e.g. Sheraton Hotel) the maximum occupied beds for the month was reported. Hotel overflow data from 2020-2022 was based on internal records while 2023-2024 the data is based on the Hamilton Housing and Homelessness Dashboard.

Prior to April 2020 hotels were not set up as a separate service provider in HIFS. The City of Hamilton was placing clients in hotels at the time to support individual clients, but it was not tracked consistently or comprehensively in the HIFS Database. Currently hotels are blocked booked as rooms and beds are estimated as 4 beds per room but families can often use multiple rooms but not all beds.

Maximum Number of City-Funded Shelter Beds Available by Month by Sector, City of Hamilton January 2020-June 2



A8809



024

A4525

	ONTARIO SUPERIOR COURT OF JUSTICE PROCEEDING COMMENCED AT HAMILTON
	AFFIDAVIT
	GOWLING WLG (CANADA) LLP Barristers & Solicitors One Main Street West Hamilton, ON L8P 4Z5 Tel: 905-540-8208 Bevin Shores (LSO#56161F) Tel: 905-540-2468 <i>bevin.shores@gowlingwlg.com</i> Jordan Diacur (LSO#65860E) Tel: 905-540-2500 <i>jordan.diacur@gowlingwlg.com</i> Lawyers for the respondent File Number: H227899

COURT FILE NO. CV-21-77187

ONTARIO

SUPERIOR COURT OF JUSTICE

BETWEEN:

KRISTEN HEEGSMAS, DARRIN MARCHAND, GORD SMYTH, MARIO
MUSCATO, SHAWN ARNOLD, BRADLEY CALDWELL, CHRISTINE DELOREY,
GLEN GNATUK, TAYLOR GOGO-HORNER, CASSANDRA JORDAN,
JULIA LAUZON, AMMY LEWIS, ASHLEY MACDONALD, COREY MONAHAN,
MISTY MARSHALL, SHERRI OGDEN, JAHHAL PIERRE, LINSLEY
GREAVES and PATRICK WARD

Applicants

-AND-

CITY OF HAMILTON

Respondent

The Cross-Examination of Roberto (Rob) Mastroianni, on an Affidavit dated July 31, 2024 taken upon affirmation in the above action this, 28th of August, 2024, conducted via videoconference hosted by the offices of Nimigan Mihailovich Reporting Inc.

APPEARANCES:

For the Applicants:

SHARON CROWE

CURTIS SELL

MICHELLE SUTHERLAND

For the City of Hamilton:

JORDAN DIACUR

JOJO JOHNSON

Gowling WLG (Canada) LLP

INDEX

PAGE

WITNESS: ROB MASTROIANI

Cross-Examination by MS. CROWE
Re-Examination by MR. DIACUR

EXHIBITS

GUIDE TO UNDERTAKINGS, ADVISEMENTS, and REFUSALS:

This should be regarded as a guide and does not necessarily constitute a complete list:

UNDERTAKINGS:

(None noted.)

UNDER ADVISEMENTS:

(None noted.)

REFUSALS:

[3] 26/18 37/5 42/15

--- Commencing at 10:07 a.m.

ROB MASTROIANNI,

THE WITNESS HEREINBEFORE NAMED,

Having been duly sworn by me to testify to the truth,

testified on their oath as follows, to wit:

CROSS-EXAMINATION BY MS. CROWE:

1 Q. Good morning, Mr. Mastroianni.

. Thank you for meeting with me today.

Okay. So we discussed you're going to have

two documents in front of you, your October 6, 2021,

affidavit and your July 31st, 2024, affidavit. You can't

have any other notes or consult any other documents --

A. Okay.

2 Q. -- for the purposes of your examination.

And you are in a private room by yourself.

A. I am, yes. I'm in my office.

3 Q. Great. And please let me know if you need

me to repeat or rephrase any questions as we go along.

Okay?

A. Okay.

4 Q. Okay. Okay. So I will start with your

July 31st, 2024, affidavit. So it indicates that you are

the Manager of Homelessness and Housing Supports for

the City?

A. That's correct.

A8812

5 Q. Okay. We will start with paragraph 4. So

if you could turn to that, please.

A. Okay.

6 Q. I'm just confirming that you are endorsing

some of the terms in the definitions that are included in

your October 6, 2021, affidavit, including the definition

of homelessness and Indigenous homelessness that was in

that affidavit; is that correct?

A. That's correct.

7 Q. Thank you. So I would like to take you to

those definitions from that October 6, 2021, affidavit.

A. Okay.

8 Q. So my first question is do you know why

there is a separate and more expansive definition of

Indigenous homelessness?

A. Really because we work closely with

Indigenous partners and based on, like, Indigenous

autonomy and, you know, part of reconciliation that

community is able to define what they see as the relevant

definition of homelessness related to their people.

9 Q. Okay. So I just want to work through that

definition with you. So if you could look at paragraph 4,

please.

A. Okay.

10 Q. So you've indicated that those who

alternate between sheltered and unsheltered. What
specifically is meant by that?

A. Those that are in shelter would be those

that are in emergency shelters, violence against women

shelters, drop ins, other locations. And then the

unsheltered would be people living unhoused in

encampments.

11 Q. Okay.

A. Living with friends, couch surfing,

whatever the case might be.

12 Q. Okay. And then it mentions living in

unaffordable, inadequate, substandard, and unsafe

conditions. What's your understanding of those terms?

A. I wouldn't necessarily define that as

homeless or unhoused. I would -- my understanding of that

would be that those individuals are housed, but it may be

precarious housing.

So it may be, you know, something that is

substandard. It might be not up to, like, building code.

It might be unsafe in terms of just building code

infractions, that kind of stuff. So somewhere where the

individual probably wouldn't want to be remaining on an

ongoing basis or permanently and still looking for other

more appropriate housing, so something that is better,

more suitable for them, more appropriate for the size of

their family, whatever the case might be.

13 Q. Okay. And what about unaffordable? What's

your interpretation of what unaffordable means?

A. Their -- you know, the individual shelter

cost or rent cost would be higher than their income source

or at a level that it, you know, makes it very difficult

for them to maintain the other expenses, so like food and

stuff like that.

So unaffordable could be, you know, they

are paying 95 per cent of their income towards their rent.

14 Q. Okay.

A. And they are only left with 5 per cent of

their income for other expenses.

15 Q. Okay. And would those other expenses

include like utilities? Internet?

A. I would understand -- I would define

shelter costs as things like rent, utilities, gas, hydro,

whatever the case might be. I wouldn't include Internet

costs, but that's what I would include as part of shelter.

16 Q. Okay. 95 per cent, is that figure coming

from somewhere specifically?

A. No. That's just an example that I used.

17 Q. Okay. And you said that you personally

wouldn't necessarily agree that those kind of precarious

housing situations that we were describing would be part

A4528

of your definition of homelessness.

But just to be clear, that definition of Indigenous homelessness is something that the City has adopted and endorses?

A. Well, the Government of Canada, through the national housing strategy, that is the definition. So we, yes, would kind of endorse that and follow that as well.

18 Q. Okay. Thank you.

So I just want to follow along with that definition of Indigenous homelessness. So is it accurate to say that according to that definition, an Indigenous individual who was evicted, couch surfed, temporarily stayed in an abusive situation, and then lived without security of tenure would be considered continuously homeless?

A. Sorry? Can you repeat the last part of that? Lived without?

19 Q. Security of tenure, which is another term that's used in this definition.

A. Would I consider that to be homeless?

20 Q. According to the definition, yes.

A. Yes.

21 Q. Okay. Thank you. Can you just clarify what is meant by security -- being without security of tenure?

A8813

A. Security of tenure I would understand to be

like that they don't have like a legal lease or a rent agreement or something that provides them legal resource or rights to that location, to that housing.

22 Q. Okay. Thank you.

So in the third bullet point of paragraph 4 of your July affidavit, you mention the VI-SPDAT tool.

A. Sorry. Sorry, can you clarify point we are looking at?

23 Q. Sorry. This is the -- so paragraph 4 of your July affidavit, and the third bullet point down.

Have you found the spot?

A. We are still in the definition of Indigenous homelessness. That looks like number 4 to me.

24 Q. No. That's your October 2021 affidavit.

MR. DIACUR: Yeah, Robert, moving back to your most recent affidavit from July 2024.

THE WITNESS: Okay. Sorry. Got it. Thank you.

BY MS. CROWE:

25 Q. That's okay. I know it's a lot of cross-referencing.

A. Got it. Thanks.

26 Q. No problem. So you are talking about the VI-SPDAT tool, so a vulnerability index service

prioritization decision assistance tool.

At what point does the VI-SPDAT get done by the City?

A. It usually is done within 14 days of somebody accessing service or being new to service. So if they've entered a shelter or drop in, another service, it generally is done within 14 days of them being part of that service.

27 Q. Generally? And so sometimes not?

A. Depending on the interactions with the client or what case management discussions are happening, it could be done earlier, but we request that it is done within 14 days.

28 Q. Okay. And how often are these assessments done or repeated?

A. They are only repeated when there has been a significant change in the person's situation. So they're not necessarily done -- it's not, like, every three months or every six months or something like that. There's not a standard. It's when there's been a significant change in their -- in the individual's situation.

29 Q. Is there a definition of significant change?

A. So they've recently lost their housing,

they became housed and then unhoused again shortly thereafter, they had a significant life event, like, you know, lost a partner or lost a job. Something like that.

30 Q. Is it possible that there are significant events that would take place that the City might not be aware of?

A. Absolutely.

31 Q. Okay. And where are the results of the VI-SPDAT assessments kept?

A. They are entered into HIFIS, which is our software database.

32 Q. Okay. And who has access to that?

A. Each of our funded programs through our homelessness serving system, so shelters, drop ins, rapid rehousing programs, intensive case management supports, et cetera.

33 Q. Okay. Do you have knowledge of any of the applicants' VI-SPDAT scores?

A. Not off the top of my head.

34 Q. Have you ever seen them?

A. Not personally, but it's information that I could access through -- like in my role and through access to HIFIS.

35 Q. So nobody's ever talked to you about the VI-SPDAT scores for any of our applicants?

A4529

A. I'm aware of some of them -- like I'm aware of them from pulling case notes and stuff like that as part of, you know, prep for this appearance.

36 Q. Right.

A. I'm just trying to say I wouldn't be able to -- you know, if you asked me what Jordan's was right now, I wouldn't be able to say he is a seven.

37 Q. Okay. Are you aware of whether of any our applicants are considered high or very high acuity?

A. I believe some of them are high to very high acuity, yes.

38 Q. Thank you.

So I want to refer back to your October 2021 affidavit with respect to the description of the VI-SPDAT assessments. So we are going back to paragraph 19 of that October 2021 affidavit.

A. Okay.

39 Q. And you will see that there is a table there.

A. Correct.

40 Q. So I want to focus on the last two rows of that table, where there's a description of the acuity level and then the level of support.

So starting with the second last row with an acuity level of 8 to 12, is it fair to say that these

A8814

individuals are considered mid to high acuity?

A. That's correct.

41 Q. And can you help me understand the intensive case management intervention that's available to those individuals?

A. So intensive case management would be -- there are intensive case management programs that are funded that have a number of, you know, caseload spots that they are funded for to be able to support a specific number of individuals.

So it is a -- I don't want to say higher level, but higher level of case management supports. There is more frequent connections with the individual.

That's for when the individuals are housed in most cases, so that they can stay connected to those individuals to help ensure that their housing is being maintained and stabilized and like a longer runway, for example, before the individual is not accessing supports any longer.

42 Q. Okay. So you mentioned that those supports are in the context of housing, like once an individual is housed?

A. Usually, yes.

43 Q. And is it the same thing for the bottom row of an acuity of 13 or higher?

A. 13 or higher is what we would consider individuals that are appropriate for permanent supportive housing. And that is kind of -- that really is some of the area that is out of scope, I would say. Not out of scope, but that doesn't exist to the extent that it needs to exist within our homelessness serving system.

So that's not something that, like, emergency shelters or drop ins or anything like that provide. That is, you know, supportive housing, often funded through the Province or Ministry of Health or other avenues.

So that's just a definition of who would be appropriate for that level of support.

44 Q. Okay. So I think you anticipated my next question, because I was wondering whether either of these programs or supports are available in the shelter environment.

A. Permanent supportive housing supports?

45 Q. No, Sorry. So when you described the level of support that is needed for individuals with those acuity ranges in the last two rows, are either of those supports or programs within the shelter system?

A. Those supports, like probably the items that are more related to intensive case management exist to a certain extent within emergency shelters systems. So

there is case management, there is regular touch bases, there's regular visits, there is support for maintaining -- for, like, stabilizing their income or being referred to other sources of income or accessing income. Those types of things.

But shelters in general and shelters staff, that's not what we would necessarily see as the level of supports that are funded or exist within emergency shelters, because that's a different type of -- like intensive case management permanent housing is a different type of setting.

46 Q. Okay. Thank you.

Okay. So we will go back to your July 2024 affidavit. And we are staying in the same paragraph, same bullet point. So it is paragraph 4, bullet point 3. Let me know when you are there.

A. I think so.

47 Q. The last sentence says that:

"[...]I reemphasize that there are no restrictions on shelter access based on an individual's acuity."

A. Mm-hmm.

48 Q. Correct?

A. Correct.

49 Q. Is it your position that shelters never

A4530

deny access to a known individual with high acuity?

A. The individual's acuity score would not be the reason that an individual is restricted or that there might be barriers to access. An individual that has a high level of acuity, for example, there may be situations that occur, like, connected to behaviours or, you know, connections to mental health where behaviours or actions are exhibited in a way toward staff or whatever that may result in a service restriction.

So it could be that those behaviours and that action is occurring with an individual that has high acuity, but it is not because a person is high acuity that they would be service restricted. It's the other things that happen that results.

50 Q. No, no. And I appreciate that. So, again, you anticipated one of my future questions, so thank you.

But I'm also trying to get at whether or not -- so you have explained that, you know, it's not the definition or the categorization of someone being high acuity that can impact shelter service.

A. Mm-hmm.

51 Q. But it's the behaviours that are associated with that acuity.

A. Mm-hmm.

52 Q. So what about the behaviours that are

A8815

associated with that acuity preventing someone from accessing shelter in the first place?

So let me just let me give you an example.

So, you know, someone who is known to a particular shelter, they know that this person exhibits disruptive behaviour, for example, that they have a hard time managing.

Are you ever aware of circumstances where someone is turned away at first instance because of those known complexities?

A. I'm not going to say that it doesn't happen, but it would be under a situation where normal practice is that, like, the shelter staff, for example, would put a note in their there, like, there would be a documentation about what happened in the person's last stay.

So there would be case management notes or, you know, a flag, for lack of a better term -- there's not actually like a flag in that way -- so that when the person presents for service again or access again, there would be a conversation between staff and the individual, staff and management of like, Okay this happened with Rob last time. Let's have a conversation with Rob to be like, Hey, last time you were here, this is what happened. These are the behaviours that resulted in you being

service restricted. We just want to make sure that you are aware that that happened last time. It can't happen again.

That kind of stuff. And then there would be that consultation or that decision about, you know, the person's willingness or commitment that that wouldn't happen again, and that, you know, the agency's ability to support the person or like, you know, give them another chance, for lack of a better term.

53 Q. Right. So I understand that what you are describing is like a best practice scenario and potentially what the guidelines or policy actually is.

But you said before that you wouldn't say that it's never happened that somebody has been turned away because of their known behavioural issues or, you know, safety concerns from staff.

So have you ever heard of that kind of scenario happening?

A. My -- I think what I'm trying to convey is I don't -- I can't sit here and say no, absolutely it doesn't happen. I don't hear of them happening like that. I'm not aware of any specific cases where it's happened.

But, you know, I'm confident in our shelter staff and our agencies that they take the approach that we all work together on and discuss in terms of like how you

would manage a situation like that.

Can I sit here and say 1000 per cent no, it does not happen? No, I cannot.

54 Q. Okay. Thank you.

How often do you go to the City-funded shelters?

A. Virtually now. I'm not in as often as I used to be. So, you know, prior to COVID, I was in very regularly, so probably like at least once a week into many of the shelters.

Now, not as often as I used to be, generally having meetings and stuff like that virtually. We have some that are back in person. And then just getting back to kind of post-COVID world of just kind of, you know, the on-site presence ramping up again, to be honest.

55 Q. Right. So when was the last time you were in one of the shelters?

A. A month ago.

56 Q. Okay. And so you said before COVID it was about once a week. What's your estimate for how often you attend post-COVID?

A. Probably once a month, once every two months.

57 Q. Okay. And how long do you stay for?

A4531

A. It depends on the duration of meetings or the purpose that I'm there for. It could be a couple hours, it could be a few hours.

58 Q. And are you there during the daytime hours? Are you ever there at night?

A. No. Generally during the day.

59 Q. Okay.

A. During my working hours.

60 Q. Do you think shelters receive adequate funding to do the work they do?

A. No.

61 Q. Why not?

A. There is a limited funding that the City of Hamilton receives through the Province, so we have limitations in terms of how much we can fund out of that finite funding pot that we receive for the service.

The agencies -- you know, there is obviously increased costs that everybody's been experiencing, increased labour costs, just general cost of living that we're all experiencing. The same thing happens with them.

So, you know, the services they require, that they offer or are required to offer, the services that our population need and then being able to put those in place, I would say the funding does not exist to the

A8816

level it should.

62 Q. So how does that, practically speaking, impact shelter operations?

A. I would say they are left supporting individuals that are experiencing things like mental health additions, whatever the case might be, that emergency shelters were not ever intended to support to that degree.

So they are, you know, looking at things like donations or other funding sources to help support being able to implement those things within their agencies to be able to support the clientele that we are serving.

63 Q. Do you have any knowledge of the impact that underfunding has on shelter staff?

A. Anecdotally, or in my opinion, I would say they are supporting individuals and managing situations that they likely were -- never thought that they would be managing.

So things like overdoses or administering Narcan and things like that. That's not necessarily something that people, you know, go to school for and get trained on when they are moving into this field, but it becomes part of their requirements on the job. They get trained in other ways.

They may do like a Narcan training kind of

thing, but it's not necessarily something that, you know -- I, for example, would have gone school and been like, I knew that I was going to be administering Narcan one day.

64 Q. Right. Okay. Do have any knowledge of staff turnover?

A. There's a very high turnover rate in this sector overall, in the homelessness serving system and human services, shelters. There's an extremely high turnover rate within the system.

65 Q. Okay. Are you aware that in March 2023 the Executive Director of Admission Services, Salvation Army and Good Shepherd delegated to City Council describing Hamilton's shelter system as being on the verge of collapse?

A. I am aware of that.

66 Q. And do you agree with that statement?

A. Yes.

67 Q. Thank you.

Would you agree that some individuals have a difficult time staying in shelters due to their mental health and/or substance use?

A. Yes.

68 Q. How many of Hamilton's shelters are wheelchair accessible?

A. I wouldn't be able to say without actually going through each one line-by-line kind of thing of each location to think of their physical plans.

I would say most are, because most have elevators, ramps, that kind of thing. There are a few that are not, but most are.

69 Q. Okay. Have you met any of the applicants in this case?

A. I have over the years for some that have been within our -- working in our system for a number of years. I've interacted with some of them, but not necessarily directly a case manager or anything like that for them.

70 Q. Okay. Who have you met?

A. I would have to look at the name of applicants, again, to be honest with you, to be able to, like, be able to give a name right now.

71 Q. Okay. When was the last time you met one of the applicants?

A. Oh, it's been quite some time. My role doesn't necessarily have frontline service like that in the same way like I used to as a case manager.

72 Q. Okay. Years?

A. It's probably been a few years, yes.

73 Q. Okay. Thank you.

A4532

In paragraph 6 of your July 2024 affidavit, you indicated in the last sentence that you provided some information regarding the original applicants drawn from the HIFIS system?

A. Mm-hmm.

74 Q. And also some Excel spreadsheet tracking tools. But just confirming that you haven't produced either of those records, the information from HIFIS or the Excel spreadsheet?

MR. DIACUR: I don't believe that is a fair question, counsel. We have requested authorization to do so.

MS. CROWE: Well, to be fair, it's never been made clear exactly what timeframe or the purposes of requesting this. And, you know, it seems like you're gathering some information since there is some access.

And I'm just trying to -- well, first of all, it's not clear to the extent the access the City already has. And I'm confirming that whatever access was referenced is not included in the affidavit.

MR. DIACUR: We have requested authorization to disclose the records. So I don't believe it's a fair question. That's a refusal.

MS. CROWE: What about the Excel spreadsheet tracking tool? I don't believe that's been

A8817

requested.

MR. DIACUR: We've requested authorization to disclose HIFIS records that are in reference to the individual applicants from the individual applicants.

MS. CROWE: Right, but this paragraph --

MR. DIACUR: It's not fair to put to this witness that he hasn't disclosed something that the City has specifically requested authorization to disclose.

MS. CROWE: I don't think it's clear that the two things are the same. But secondly, with respect to what is in paragraph 6, Mr. Mastroianni is making a distinction between those HIFIS records and Excel spreadsheet tracking tools kept by City staff.

MR. DIACUR: I don't accept that there is a distinction. We've requested authorization to disclose City records with reference to the individual applicants. It's not an unfair question and it's a refusal, counsel.

---REFUSAL

BY MS. CROWE:

75 Q. Okay. All right. Let's move on to paragraph 10. And so you are describing the newly formed housing emergency fund.

Can you confirm, this fund is only available once every 24 months?

A. There is a maximum amount. It's not a one

time in 24 months. There is a maximum amount that an individual can receive within a 24-month period. And then there are exceptions to that.

So there is a clause within our policy that, for example, we call like a once in a lifetime above and beyond where if they have received the maximum amount in the last 24 months, but they're in a housing situation that requires or would fit under a housing emergency fund normally, but they've received maximum amount, we would assess it to be able to go over that, like make that exception and then issue funds again within that same 24-month period.

76 Q. So is it fair to say issuing the funds more than once within 24-hour periods is done on the basis of extenuating circumstances?

A. No. I would say issuing -- issuance is not the number of times within 24 months. It's the amount.

77 Q. The amount.

A. So I would say issuing higher than the maximum amount for that family size within a 24-month period is done like on a case-by-case basis by exception.

78 Q. Okay. According to discretion. So there is no automatic entitlement to it?

A. That's correct.

79 Q. Okay. And then I also understand that your

accommodation costs can't exceed 95 per cent of the household income in order to be eligible for the fund; is that correct?

A. That's correct.

80 Q. Okay. What is included in accommodation cost then? We had a bit of this discussion earlier, but I want to narrow in for the purposes of this program.

Is accommodation cost just rent, or does it include other things, like utilities?

A. It includes utilities. So rent, utilities, you know, gas, hydro, water.

81 Q. Okay. And so part of the program is specifically for people who are on Ontario Works and Ontario Disability; correct?

A. Yes. It is open to all individuals in receipt of Ontario Works, in receipt of ODSP, or living with a low income within the City of Hamilton.

82 Q. Okay. Maybe I'm wrong, then. Is there part of the program with respect to first and last month's rent that is only available to people on social assistance?

A. First month's rent deposit is only available -- or, sorry, last month's rent deposit is only available to individuals in receipt of social assistance, so OW and ODSP.

A4533

83 Q. Okay. Do you have knowledge of the rates for a single person under the Ontario Works and the Ontario Disability Support Program?

A. I do.

84 Q. Okay. And what are those rates?

A. Sorry. I'm aware generally, but like, again, you know, it's not the day-to-day thing in terms of quoting that rate, so I would have to look it up.

85 Q. Do you know the amount approximately?

A. I believe for a single individual on OW, if they are receiving full benefit, it's around 750, I think. I may be wrong.

86 Q. Okay. What about for ODSP, approximately?

A. I would have to look that up, to be honest with you.

87 Q. Yes.

A. I think it's around 12- to 1400.

88 Q. Okay.

A. But, again, I'd have to look that up. I don't necessarily look at ODSP rates regularly, to be able to quote it.

89 Q. Understood. What about average rental cost in Hamilton. Do you know what the average one-bedroom rents are?

A. Not off the top of my head, no.

A8818

90 Q. Any average rental costs now?

A. I'm aware that they are likely higher than -- like all I can say is that I know that they are higher than an individual in receipt of Ontario Works. Higher than the amount that an individual in receipt of Ontario Works receives from OW.

91 Q. Okay. What about an individual in receipt of Ontario Disability?

A. I couldn't answer that because, again, the rates are higher, so I don't know what the average market rent rate is right now compared to the ODSP rate.

92 Q. Okay. We are going to go to paragraph 12 of your July affidavit.

A. Okay.

93 Q. So you said that:

"[...]the City has city funded programs dedicated to supporting high acuity individuals."

Can you -- and maybe you have covered some of this off. But I'm just trying to get you to clarify what those programs are.

A. So for high acuity individuals?

94 Q. Mm-hmm.

A. So that would be, like, the 8 to 12 range.

95 Q. Mm-hmm.

A. So that would be things like intensive case management supports, rapid rehousing, those programs.

96 Q. And who administers these programs?

A. They are programs that operate through contracted agencies. So, for example, Mission Services, Good Shepherd, Run, Rapid Rehousing, and ICM programs.

97 Q. Do you have any knowledge of any of the spaces or spots that are available through these programs?

A. I'm generally aware, but I wouldn't be able to quote the number off the top of my head.

98 Q. Okay. Do you know if any of these programs have waitlists?

A. They generally have a waitlist, yes.

99 Q. Do you have any knowledge of how long the waitlists are?

A. No. I don't.

100 Q. Okay. Do you have any knowledge of the eligibility criteria for these programs?

A. I, again, would have to -- I haven't looked at the eligibility criteria recently, so I would have to look that up and refer to our contracts for that, to be honest with you.

101 Q. Okay. That's fine. We are going to move on to paragraph 16.

A. Okay.

102 Q. So paragraph 16 mentions that the City also oversees residential care facilities. And I just want to confirm that residential care facilities are separate and apart from the emergency shelter system.

A. They are. Yes, they are not part of the emergency shelter system. They are a sector of their own within housing continuum.

But I also want to be clear that there is a difference between licensed residential care facilities and then what I'm talking about here is the residential care facilities subsidy program, which supports a number of residents within a number of the homes, but not all of the licensed RCFs.

103 Q. Okay. Thank you.

And in paragraph 17 on the next page you talk about the YMCA and the YWCA.

A. Mm-hmm.

104 Q. So your affidavit describes the YMCA as a temporary shelter program. My understanding is the YMCA actually has a rooming house facility where they provide transitional housing.

A. My description there is not a temporary emergency shelter. There's a difference. Referring to it as a shelter program means like a housing program. So it is housing. It's not emergency shelter like we are

A4534

talking Mission Services or Good Shepherd, that kind of thing. There is a distinction there. It's not shelter programs.

105 Q. Right. It's a housing program, and they charge rent.

A. They do. They rent rooms to individuals for, like, long-term leases.

106 Q. Long-term. Okay. Thank you.

And then the other example is YWCA. Again, my understanding is that they have a transitional program where people could stay for a year and potentially longer. Is that your understanding?

A. Correct.

107 Q. And again, they charge rent?

A. Correct.

108 Q. And there's leases or some other kind of occupancy agreements?

A. To my understanding, yes.

109 Q. Thank you. And then you also indicated in the same paragraph that -- you reference the fire that recently took place at the YMCA.

A. Mm-hmm.

110 Q. And has, quote, continued to shelter same, meaning the 174 individuals, despite the recent fire.

Is that still your understanding?

A8819

A. So there were a number of individuals that were affected by that fire.

111 Q. Mm-hmm.

A. So we worked closely with the YMCA to -- the City actually activated our department's emergency response program. So we worked closely with Red Cross and YWCA -- YMCA, sorry, and other partners to activate emergency -- like accommodations within their site.

So they were using things like gyms and other locations for, like, cots on a temporary basis and trying to register all the gentlemen that were living in those accommodations.

Some chose to stay with friends. Some chose to stay with family. Some chose to not return and make their own accommodations or even encamp for a period of time.

So there was something available to all that were interested, but some chose not to accept this space available.

112 Q. Okay. I want to just be clear, because my impression from reading this was that no one was displaced as a result of the fire but that's not your evidence?

A. There was not a refusal of support or accommodation to those that were interested. Some we tried to, you know, offer them a space, and some chose to

not take it, so we were trying to -- I don't to use the word "convinced," but we were promoting or encouraging individuals to accept the space. But some chose to not accept it anyway, because they were not interested.

113 Q. Right. But just to fine-tune the point a little bit further, the individuals that had to actually leave the YWCA -- sorry -- YMCA following the fire.

A. Individuals chose to leave the YMCA following the fire. They were able to be accommodated at different space within the YMCA, but the individuals that were not there chose to leave that space.

114 Q. Okay. But they had to vacate their rooms after the fire?

A. Okay. Well, there was a fire.

MR. DIACUR: He's answered -- you've answered the question three times. It's a refusal if you're going to continue to ask the same question.

MS. CROWE: I don't think it had been answered three times, but that's fine.

MR. DIACUR: Yes. He said the exact same thing in response to the same question the last three times it was asked.

MS. CROWE: Mr. Jordan, I don't know why you insist on using this tone. We can keep this civil. Okay?

MR. DIACUR: Oh, I am being civil.

MS. CROWE: I don't think my --

MR. DIACUR: I am not even raising my voice. I am refusing any further questions that repeat the same information. That's it.

MS. CROWE: That's fine. I think the record will show that that's not the case, but that's fine. We'll move on.

MR. DIACUR: The record will show that the same question was posed three times and the same answer was given three times.

MS. CROWE: Mr. Mastroianni's affidavit reads as though nobody had to leave the YMCA following the fire.

MR. DIACUR: He answered that question. He said there was a choice made. Some chose to leave. No one had to leave. He is not giving that answer yet again.

MS. CROWE: Well, what I was trying to verify was that people --

MR. DIACUR: Three times he's given that answer.

MS. CROWE: -- had to leave their rooms, even if they had to leave the facility itself.

MR. DIACUR: That's not what it says in the affidavit, and you've got his answer.

A4535

MS. CROWE: I don't know if I got the answer to the last one, but that's fine. We can move on.

MR. DIACUR: It's the same question posed three times. It's a refusal. Move on.

---REFUSAL

BY MS. CROWE:

115 Q. Moving to paragraph 18, you also mentioned that the City can place families in hotels on an ad hoc basis. So when you say "ad hoc," this means as is possible?

A. So we access -- we utilize hotels as a temporary overflow to our emergency shelter system so families, for example, that would normally be eligible or be able to be accommodated within the existing emergency shelters spaces but cannot be for simply space within those locations, we utilize hotels to be able to accommodate those people or families.

116 Q. Okay. Is it ever the case that someone cannot access the hotel program?

A. Yes. Similar to emergency shelters, there may be situations of, you know, we don't have any rooms left available, or there may be situations of a service restriction, similar to operating in emergency shelters.

117 Q. Thank you.

Moving to paragraph 19, where you discuss

A8820

violence against women or VAW shelters.

A. Mm-hmm.

118 Q. Would you agree that these shelters have been operating at or over capacity for several years?

A. My understanding, yes. The violence against women shelter operates separately from the emergency shelter system, is funded through a different ministry.

So I work closely with that system, but I don't oversee that system or anything like that. So anecdotally, I would say yes, they have been at capacity for several years.

119 Q. Thank you.

Okay. We are going to skip forward to paragraph 27.

A. Okay.

120 Q. And so this paragraph mentions Exhibit A in your affidavit where you have a table of city-funded beds by month from January 2020 to June 2024.

I want to discuss the definition of available. And I know it seems like it might be very plain language, but can you explain to me what your definition of available and available bed or space means?

A. Sorry. Can I pull up the appendix --

121 Q. Of course, yes.

A. -- to refer to it. Because I don't have that up, to be honest.

And to be honest with you, I would have to find it, or bear with me while I find it, unless you want -- I know it is affecting bandwidth. But if you want to show it on the screen, I can look at it. That might be faster than me trying to locate it.

122 Q. Okay. That's fine. I will try and I'll go off video for this portion.

MR. DIACUR: Rob, it may help. It's the third from the end, the third page from the end.

THE WITNESS: Oh, sorry.

MS. CROWE: Thank you.

THE WITNESS: The third page or second page from the end? Oh, no. Third page. Got it. Thank you.

BY MS. CROWE:

123 Q. Thank you.

A. You can come back on video.

124 Q. So it mentions the number of city-funded shelter beds available by month or sector.

And then in the next paragraph you talk about -- sorry. I know I'm bringing you back. So just quickly reference here to 29 where you talk about the fluidity of availability, because things can change rapidly.

A. Okay.

125 Q. So the word that is used is "available." Does that mean unoccupied, like a bed is unoccupied?

A. No. That means that, you know, there's 20 beds within a particular emergency shelter, so we would say that there are 20 beds available in our system.

126 Q. Okay. And is it ever the case that there is a bed that is listed as available, but someone seeking emergency shelter nonetheless can't access it?

A. Yeah. That's where we would be speaking to occupancy.

127 Q. Mm-hmm.

A. So I would define it differently, as like available is the number of beds that exist in the system, and then the beds that are occupied is different.

128 Q. Right.

A. So, for example, again, the 20-bed shelter example, there's 20 available; 19 may be occupied. So that means there is one space that somebody can -- seeking service can access, or maybe all 20 are occupied so there are no beds left where somebody can occupy or seek service.

129 Q. Okay. What I'm wondering about is a situation where a bed is not occupied, but it's still not available for use.

A4536

A. There could be situations where that happens. So it could be -- you know, especially in locations that have units. So the unit has been damaged, requires cleaning, requires repairs between the last person moving out and it being able to be occupied by somebody, a new family or a new person.

So it might be that it's a 20-bed shelter, but only 19 can be accessed or utilized, because of the other one being, you know, offline because of damages or something like that.

130 Q. Right. What about in the family system? My understanding is that there are rooms with -- sometimes with multiple beds in one room.

A. Correct.

131 Q. If a family who has that room isn't using all of the beds that are in that room, will the shelter allow someone from a different family to access those remaining beds?

A. Not generally, no, because we wouldn't -- we wouldn't mix families within one private location. So, for example, in the family center, if there's -- they are like apartment-style units.

So if there is a unit that can accommodate four people, but it is a family of three, we wouldn't go and put one random person from another family and require

A8821

them to stay in that bed and mix families like that in a private accommodation.

132 Q. Right. For these shelters who offer dorm style, more communal shelter, do staff ever not utilize the full amount of shelter beds due to safety concerns?

A. Not to my knowledge.

133 Q. You've never heard of that happening?

A. No.

134 Q. What if there is a history of two shelter residents who have had previous conflict and the only available setting is a dorm style, where these individuals would be sharing a communal space?

MR. DIACUR: Counsel, that's refused. He said he's never heard of it.

---REFUSAL

BY MS. CROWE:

135 Q. Okay. And so the availability is calculated according to the HIFIS data; correct?

A. Occupancy would be calculated based on HIFIS data, so the number of people that are booked into that location compared to the number of beds available.

The number of beds available is fairly stagnant, so it doesn't necessarily change very often. So there's not like an ongoing calculation for that. It's occupancy that gets calculated regularly.

136 Q. I see what you're saying. Okay.

And how often do you see updates to the HIFIS system?

A. In terms of occupancy?

137 Q. Yes.

A. We can run occupancy on a daily basis. So you can run it -- I can run it right now for what, like, occupancy is in this exact moment.

138 Q. And do you have any idea how often on a daily basis staff are inputting data into HIFIS?

A. Agency staff are inputting on a regular basis, like as situations occur. So if I'm presenting as at a shelter, they would be doing my intake inputting -- they could be inputting information and then -- you know, taking my information and inputting it 10 minutes later, or they could be inputting it, like, right in the moment right now as they are talking to me and inputting my information and booking me in and that kind of thing.

So it is intended to be live.

139 Q. So it is intended to be a live. Are you aware of situations where there is a longer than 10-minute delay in inputting data into HIFIS?

A. There could be, yes, because staff are -- could have multiple people that are trying to book in at the same time. They could have situations where they are

booking somebody in and have to go and respond to an emergency or a medical event or something like that, so something that pulls them away from what they are doing in that moment, so it would cause a delay in inputting that information.

140 Q. Okay. Are you aware of HIFIS data ever being inaccurate with respect to occupancy?

A. I wouldn't say it's inaccurate. I would say that there are situations like I'm describing where there is a delay in inputting the information.

So, again, if I'm working with Jordan and I get called away to do something and I'm trying to book Jordan in, and I haven't actually registered him in or admitted him in the system, and I got called away to respond to something else, that 20-minute period, for example, if, you know, I then am -- another one of my colleagues is trying to book you in, Sharon, and saying, oh, look, there is a bed available, not knowing that I've already promised it to Jordan, there is like a gap in time.

So I wouldn't say it's inaccurate. It's just kind of the realities of operations, to be honest.

141 Q. Are shelter beds ever held for individuals?

A. Yeah. They are held in situations of like doing an assessment for intake. So an individual could

A4537

call a shelter and say, You know, do you have space, and there is a -- there is like a phone intake or a phone assessment. And the staff person is like, Yeah, I will hold this bed for you until 4:00 o'clock.

142 Q. Okay.

A. We actually promote that happening, because it prevents the individual from, you know, calling shelter A and saying, Do you have space, and being promised a bed, and then it takes me an hour to get there, and by the time I get there and walk there and make the effort, it's been given away to somebody else.

So we want to prevent that from happening, so we actually encourage that, like, holding or reserving until -- like, as part of our operations.

143 Q. Right. Okay. That makes sense.

How often does that scenario happen that you just described, where somebody calls ahead for a bed but when they arrive, it is no longer available?

A. I wouldn't say that's happening on a regular basis, and I wouldn't be able to speak to that. That's what we are working to avoid happening.

So it wouldn't be -- I wouldn't say that it's something that is like a regular practice or anything like that.

144 Q. Okay. Paragraph 28 and 29 of your July

A8822

affidavit?

A. Yeah.

145 Q. So you've given a breakdown of occupancy levels from the month of June 2024 to present.

A. Mm-hmm.

146 Q. And then you draw conclusions based on that occupancy level in paragraph 29.

And I just want to confirm that those conclusions are also based on the same time period of June 2024 to July 31st, 2024.

A. Correct.

147 Q. Thank you.

In paragraph 34 you describe the City's winter response strategy for 2023 and 2024.

A. Mm-hmm.

148 Q. Is it fair to say that the strategy was in response to a lack of daytime and overnight spaces for people experiencing homelessness?

A. For winter months, yes.

149 Q. Thank you. Paragraph 35, you go on to describe City records with respect to the individual applicants.

Is there anything you want to clarify from these records?

A. Not to my knowledge, unless there is

something specific you are asking about.

150 Q. No. Okay. Thank you very much. Those are my questions.

MR. DIACUR: Thank you, counsel. I only have a brief re-examination.

RE-EXAMINATION BY MR. DIACUR:

151 Q. Sir, you were asked about a delegation from shelter providers to city council and a statement that the delegates made regarding the shelter system.

And the quote was that it is on the verge of collapse. And that was as of July 2023.

MS. CROWE: Sorry. Just to clarify, it was March of 2023.

MR. DIACUR: I'm sorry. I thought you said July. No, that's fine. March 2023, yes.

BY MR. DIACUR:

152 Q. So clarify that on the record. So that statement is as of March 2023, sir.

My question for you is does that remain true?

A. Yeah. I would say -- I would say our system continues to see unprecedented pressure in terms of the number of people that are requesting access to emergency shelter spaces.

The level of supports required of the

individuals that are accessing space is much higher than it used to be. The existence of mental health and addictions and concurrent disorders and those situations, that shelters are doing their best to support those individuals that are living with those situations and seeking space, but emergency shelters are not intended to be that.

You know, they are not part of a mental health system. They are not part of a permanent supportive housing system.

They are a system of last resort and are not funded or expected or set up to be able to support that situation. So I would say that that's where, you know, the reference to on the verge of collapse.

It's because of the unprecedented pressure that they are under that continues to exist.

153 Q. Has the shelter system collapsed between March 2023 and today?

A. I would say no, it has not. It continues to see -- to experience pressures, but I would say no, it has not collapsed. I would say it's doing very well --

154 Q. How is -- I'm sorry.

A. No, I'm just giving my opinion. I would say it's operating very well for -- for, again, what shelters are experiencing and staff are experiencing and

A4538

changes in our system.

I would say it's operating very well. And a lot of that is to do with the dedication of staff who are frontline and agencies that are working their best to provide the service.

And not to toot our own horn, but, you know, all the staff on the City side as well that are doing our best to try to support it.

MR. DIACUR: Thank you. Those are all my questions in re-examination. I appreciate you attending and answering.

THE WITNESS: Okay.

MS. CROWE: Thank you very much.

--- The examination concluded at 11:02 a.m.

A8823

I hereby certify the foregoing is a full, true, and correct transcription of all of my oral stenographic notes to the best of my ability so taken at the Cross-Examination of ROB MASTRIOLIANI, given under oath before me on the 28th of August, 2024.

Amy Armstrong, CVR-RVR

Certified Realtime Verbatim Reporter #7305

Certified Commissioner of Oaths

Certified this 30th of August, 2024

Reproductions of this transcript are in direction violation of the O.R. 587/91 of The Administration of Justice Act January 1, 1990, and are not certified without the original signature of the Certified Court Reporter. Absence of this certification and signature is indication this document has been reproduced without the permission of Nimigan Mihailovich Reporting Inc., and as such is not an original document.

A4539

BY MR. DIACUR: [1] 47/16 BY MS. CROWE: [5] 10/20 26/19 37/6 39/16 42/16 MR. DIACUR: [20] 10/16 25/10 25/21 26/2 26/6 26/14 35/15 35/20 36/1 36/3 36/9 36/15 36/20 36/24 37/3 39/10 42/13 47/4 47/14 49/9 MS. CROWE: [15] 25/13 25/24 26/5 26/9 35/18 35/23 36/2 36/6 36/12 36/18 36/22 37/1 39/13 47/12 49/13 THE WITNESS: [4] 10/18 39/12 39/14 49/12	5 5 per cent [1] 8/12 587/91 [1] 50/17	36/12 36/25 38/18 46/1 affirmation [1] 1/20 after [1] 35/13 again [19] 12/1 17/15 18/20 28/29/3 19/7 20/15 24/16 27/11 29/7 29/19 30/9 31/19 33/9 33/14 36/17 40/17 44/11 48/24 against [3] 7/4 38/1 38/6 agencies [5] 19/24 21/17 22/11 31/5 49/4 Agency [1] 43/11 agency's [1] 19/7 ago [1] 20/19 agree [4] 8/24 23/17 23/20 38/3 agreement [1] 10/3 agreements [1] 33/17 ahead [1] 45/17 all [14] 19/25 21/20 25/18 26/20 28/15 30/3 32/12 34/11 34/17 40/20 41/16 49/7 49/9 50/2 allow [1] 41/17 along [2] 5/18 9/9 already [2] 25/19 44/19 also [8] 17/17 25/6 27/25 32/1 32/8 33/19 37/7 46/9 alternate [1] 7/1 am [6] 5/16 23/16 36/1 36/3 36/4 44/16 AMMY [1] 1/9 amount [10] 26/25 27/1 27/6 27/9 27/17 27/18 27/20 29/9 30/5 42/5 Amy [1] 50/8 anecdotally [2] 22/15 38/11 another [5] 9/18 11/6 19/8 41/25 44/16 answer [6] 30/9 36/10 36/17 36/21 36/25 37/2 answered [4] 35/15 35/16 35/19 36/15 answering [1] 49/11 anticipated [2] 15/14 17/16 any [20] 5/12 5/12 5/18 12/17 12/25 13/8 14/19 19/22 22/13 23/5 24/7 30/1 31/7 31/7 31/11 31/14 31/17 36/4 37/21 43/9 anything [5] 15/8 24/12 38/10 45/23 46/23 anyway [1] 35/4 apart [1] 32/4 apartment [1] 41/22 apartment-style [1] 41/22 appearance [1] 13/3 APPEARANCES [1] 1/23 appendix [1] 38/24 applicants [12] 1/13 2/2 12/25 13/9 24/7 24/16 24/19 25/3 26/4 26/4 26/16 46/22 applicants' [1] 12/18 appreciate [2] 17/15 49/10 approach [1] 19/24 appropriate [4] 7/24 7/25 15/2 15/13 approximately [2] 29/9 29/13 are [124] 5/15 5/22 6/4 6/5 7/3 7/4 7/16 8/10 8/12 10/8 10/13 10/24 11/11 11/14 11/16 12/4 12/8 12/10 13/8 13/9 13/10 13/15 14/1 14/7 14/7 14/9 14/14 14/21 15/2 15/16 15/21 15/24 16/8 16/14 16/16 16/19 17/8 17/22 17/25 18/8 18/25 19/2 19/10 20/13 21/4 21/5 21/23 22/4 22/5 22/9 22/12 22/16 22/22 23/11 23/24 24/4 24/5 24/6 24/6 26/3 26/10 26/21 27/3 28/13 29/5 29/11 29/24 30/2 30/3 30/10 39/12
- -- to [1] 39/1 ---REFUSAL [3] 26/18 37/5 42/15 -AND [1] 1/14	7 7305 [1] 50/12 750 [1] 29/11 77187 [1] 1/1	A8824
1 10 [1] 26/21 10 minutes [1] 43/15 10-minute [1] 43/21 1000 per cent [1] 20/2 10:07 [1] 5/1 11:02 [1] 49/14 12 [4] 13/25 29/17 30/12 30/24 13 [2] 14/25 15/1 14 days [3] 11/4 11/7 11/13 1400 [1] 29/17 15 [1] 4/12 16 [2] 31/24 32/1 17 [1] 32/15 174 [1] 33/24 18 [2] 4/12 37/7 19 [4] 13/16 37/25 40/18 41/8 1990 [1] 50/18	9 91 [1] 50/17 95 per cent [3] 8/10 8/20 28/1	
2 20 [4] 40/4 40/6 40/18 40/20 20-bed [2] 40/17 41/7 20-minute period [1] 44/15 2020 [1] 38/19 2021 [6] 5/10 6/6 6/11 10/15 13/14 13/16 2023 [7] 23/11 46/14 47/11 47/13 47/15 47/18 48/18 2024 [13] 1/20 1/21 5/11 5/22 10/17 16/13 25/1 38/19 46/4 46/10 46/10 46/14 50/5 24 months [4] 26/24 27/1 27/7 27/17 24-hour [1] 27/14 24-month [3] 27/2 27/12 27/20 26/18 [1] 4/12 27 [1] 38/15 28 [1] 45/25 28th [2] 1/21 50/4 29 [3] 39/23 45/25 46/7	A a.m [2] 5/1 49/14 ability [2] 19/7 50/3 able [19] 6/19 13/5 13/7 14/9 21/24 22/11 22/12 24/1 24/16 24/17 27/10 29/20 31/9 35/9 37/14 37/16 41/5 45/20 48/12 about [19] 8/2 10/24 12/24 17/25 18/15 19/5 20/21 25/24 29/13 29/22 30/7 32/10 32/16 39/22 39/23 40/23 41/11 47/1 47/7 above [2] 1/21 27/5 Absence [1] 50/19 absolutely [2] 12/7 19/20 abusive [1] 9/13 accept [4] 26/14 34/18 35/3 35/4 access [16] 12/12 12/22 12/22 16/20 17/1 17/4 18/20 25/16 25/18 25/19 37/11 37/19 40/9 40/20 41/17 47/23 accessed [1] 41/8 accessible [1] 23/25 accessing [5] 11/5 14/18 16/4 18/2 48/1 accommodate [2] 37/17 41/23 accommodated [2] 35/9 37/14 accommodation [5] 28/1 28/5 28/8 34/24 42/2 accommodations [3] 34/8 34/12 34/15 according [4] 9/11 9/21 27/22 42/18 accurate [1] 9/10 Act [1] 50/17 action [2] 1/21 17/11 actions [1] 17/7 activate [1] 34/7 activated [1] 34/5 actually [9] 18/19 19/12 24/1 32/20 34/5 35/6 44/13 45/6 45/13 acuity [18] 13/9 13/11 13/22 13/25 14/1 14/25 15/21 16/21 17/1 17/2 17/5 17/12 17/12 17/20 17/23 18/1 30/18 30/22 ad [2] 37/8 37/9 ad hoc [2] 37/8 37/9 addictions [2] 22/6 48/3 adequate [1] 21/9 administering [2] 22/19 23/3 administers [1] 31/3 Administration [1] 50/17 Admission [1] 23/12 admitted [1] 44/14 adopted [1] 9/4 ADVISEMENTS [2] 4/1 4/8 affected [1] 34/2 affecting [1] 39/5 affidavit [22] 1/20 5/11 5/11 5/22 6/6 6/8 6/11 10/7 10/11 10/15 10/17 13/14 13/16 16/14 25/1 25/20 30/13 32/18	
3 30th [1] 50/14 31 [1] 1/20 31st [3] 5/11 5/22 46/10 34 [1] 46/13 35 [1] 46/20 37/5 [1] 4/12		
4 42/15 [1] 4/12 4:00 o'clock [1] 45/4		A4540

<p>A</p> <p>are... [53] 30/21 31/4 31/8 31/15 31/23 32/3 32/5 32/5 32/6 32/25 38/14 40/6 40/15 40/20 40/21 41/12 41/16 41/21 42/20 43/10 43/11 43/17 43/20 43/23 43/24 43/25 44/3 44/6 44/9 44/23 44/24 45/21 46/9 47/1 47/2 47/23 48/1 48/4 48/5 48/6 48/8 48/9 48/11 48/11 48/16 48/25 48/25 49/4 49/4 49/7 49/9 50/16 50/18</p> <p>area [1] 15/4</p> <p>Armstrong [1] 50/8</p> <p>Army [1] 23/12</p> <p>ARNOLD [1] 1/7</p> <p>around [2] 29/11 29/17</p> <p>arrive [1] 45/18</p> <p>as [32] 4/2 5/5 5/18 6/19 7/14 8/17 8/19 9/7 13/2 16/7 20/7 20/7 20/11 20/11 23/14 24/22 32/18 32/24 34/22 36/13 37/9 37/11 40/8 40/13 43/12 43/12 43/17 45/14 47/11 47/18 49/7 50/22</p> <p>ASHLEY [1] 1/9</p> <p>ask [1] 35/17</p> <p>asked [3] 13/6 35/22 47/7</p> <p>asking [1] 47/1</p> <p>assess [1] 27/10</p> <p>assessment [2] 44/25 45/3</p> <p>assessments [3] 11/14 12/9 13/15</p> <p>assistance [3] 11/1 28/21 28/24</p> <p>associated [2] 17/22 18/1</p> <p>at [22] 5/1 6/22 8/6 10/9 11/2 17/17 18/9 20/9 21/5 22/9 24/15 29/20 31/20 33/21 35/9 38/4 38/11 39/6 43/13 43/24 49/14 50/3</p> <p>attend [1] 20/22</p> <p>attending [1] 49/10</p> <p>August [2] 1/21 50/5</p> <p>August,2024 [1] 50/14</p> <p>authorization [5] 25/11 25/22 26/2 26/8 26/15</p> <p>automatic [1] 27/23</p> <p>autonomy [1] 6/18</p> <p>availability [2] 39/24 42/17</p> <p>available [25] 14/4 15/16 26/24 28/20 28/23 28/24 31/8 34/17 34/19 37/22 38/21 38/23 38/23 39/20 40/2 40/6 40/8 40/14 40/18 40/25 42/11 42/21 42/22 44/18 45/18</p> <p>avenues [1] 15/11</p> <p>average [4] 29/22 29/23 30/1 30/10</p> <p>avoid [1] 45/21</p> <p>aware [14] 12/6 13/1 13/1 13/8 18/8 19/2 19/22 23/11 23/16 29/6 30/2 31/9 43/21 44/6</p> <p>away [6] 18/9 19/15 44/3 44/12 44/14 45/11</p>	<p>13/7 14/6 14/9 15/12 17/2 17/4 17/5 17/10 17/13 18/12 18/14 18/17 18/21 18/23 19/5 20/8 20/11 20/15 21/2 21/3 22/6 22/12 22/17 23/3 24/1 24/16 24/16 24/17 25/13 27/10 28/2 29/12 29/14 29/20 30/24 31/1 31/9 31/21 32/8 34/20 35/9 37/13 37/14 37/14 37/15 37/16 37/21 37/22 38/21 39/2 39/3 39/6 40/10 40/18 41/1 41/2 41/5 41/7 41/8 42/12 42/19 43/13 43/14 43/16 43/19 43/20 43/23 44/22 45/20 45/22 48/2 48/7 48/12</p> <p>bear [1] 39/4</p> <p>became [1] 12/1</p> <p>because [18] 6/16 15/15 16/9 17/12 18/9 19/15 24/4 30/9 34/20 35/4 39/1 39/24 41/8 41/9 41/19 43/23 45/6 48/15</p> <p>becomes [1] 22/23</p> <p>bed [11] 38/23 40/3 40/8 40/17 40/24 41/7 42/1 44/18 45/4 45/9 45/17</p> <p>bedroom [1] 29/23</p> <p>beds [14] 38/18 39/20 40/5 40/6 40/14 40/15 40/21 41/13 41/16 41/18 42/5 42/21 42/22 44/23</p> <p>been [17] 5/4 11/16 11/20 19/14 21/18 23/2 24/10 24/20 24/24 25/14 25/25 35/18 38/4 38/11 41/3 45/11 50/20</p> <p>before [4] 14/18 19/13 20/20 50/4</p> <p>behaviour [1] 18/6</p> <p>behavioural [1] 19/15</p> <p>behaviours [6] 17/6 17/7 17/10 17/22 17/25 18/25</p> <p>being [15] 9/24 11/5 11/7 14/16 16/4 17/19 18/25 21/24 22/11 23/14 36/1 41/5 41/9 44/7 45/8</p> <p>believe [5] 13/10 25/10 25/22 25/25 29/10</p> <p>benefit [1] 29/11</p> <p>best [5] 19/11 48/4 49/4 49/8 50/2</p> <p>better [3] 7/24 18/18 19/9</p> <p>between [7] 1/4 7/1 18/21 26/12 32/9 41/4 48/17</p> <p>beyond [1] 27/6</p> <p>bit [2] 28/6 35/6</p> <p>book [3] 43/24 44/12 44/17</p> <p>booked [1] 42/20</p> <p>booking [2] 43/18 44/1</p> <p>bottom [1] 14/24</p> <p>BRADLEY [1] 1/7</p> <p>breakdown [1] 46/3</p> <p>brief [1] 47/5</p> <p>bringing [1] 39/22</p> <p>building [2] 7/19 7/20</p> <p>bullet [4] 10/6 10/11 16/15 16/15</p> <p>but [52] 7/16 8/19 9/2 11/12 12/21 14/12 15/5 16/6 17/12 17/17 17/22 18/12 19/13 19/23 22/22 23/1 24/6 24/11 25/7 26/5 26/10 27/7 27/9 28/6 29/6 29/19 30/20 31/9 32/8 32/12 34/18 34/22 35/2 35/3 35/5 35/10 35/12 35/19 36/7 37/2 37/15 38/9 38/22 39/5 40/8 40/24 41/8 41/24 45/18 48/6 48/20 49/6</p>	<p>called [2] 44/12 44/14</p> <p>calling [1] 45/7</p> <p>calls [1] 45/17</p> <p>can [28] 9/16 9/23 10/8 14/3 18/25 17/20 20/2 21/15 26/23 27/2 30/3 30/19 35/24 37/2 37/8 38/22 38/24 39/6 39/18 39/24 40/19 40/20 40/21 41/8 41/23 43/6 43/7 43/7</p> <p>can't [5] 5/11 19/2 19/20 28/1 40/9</p> <p>Canada [2] 2/10 9/5</p> <p>cannot [3] 20/3 37/15 37/19</p> <p>capacity [2] 38/4 38/11</p> <p>care [4] 32/2 32/3 32/9 32/11</p> <p>case [24] 7/10 8/1 8/18 11/11 12/15 13/2 14/4 14/6 14/7 14/12 15/24 16/1 16/10 18/17 22/6 24/8 24/12 24/22 27/21 27/21 31/1 36/7 37/18 40/7</p> <p>caseload [1] 14/8</p> <p>cases [2] 14/15 19/22</p> <p>CASSANDRA [1] 1/8</p> <p>categorization [1] 17/19</p> <p>cause [1] 44/4</p> <p>cent [5] 8/10 8/12 8/20 20/2 28/1</p> <p>center [1] 41/21</p> <p>certain [1] 15/25</p> <p>certification [1] 50/19</p> <p>certified [5] 50/12 50/13 50/14 50/18 50/19</p> <p>certify [1] 50/1</p> <p>cetera [1] 12/16</p> <p>chance [1] 19/9</p> <p>change [5] 11/17 11/21 11/24 39/24 42/23</p> <p>changes [1] 49/1</p> <p>charge [2] 33/5 33/14</p> <p>choice [1] 36/16</p> <p>chose [9] 34/13 34/14 34/14 34/18 34/25 35/3 35/8 35/11 36/16</p> <p>CHRISTINE [1] 1/7</p> <p>circumstances [2] 18/8 27/15</p> <p>city [24] 1/16 2/7 5/24 9/3 11/3 12/5 20/5 21/14 23/13 25/18 26/7 26/13 26/16 28/17 30/16 30/16 32/1 34/5 37/8 38/18 39/19 46/21 47/8 49/7</p> <p>City's [1] 46/13</p> <p>city-funded [2] 38/18 39/19</p> <p>civil [2] 35/24 36/1</p> <p>clarify [6] 9/23 10/8 30/20 46/23 47/12 47/17</p> <p>clause [1] 27/4</p> <p>cleaning [1] 41/4</p> <p>clear [6] 9/2 25/14 25/18 26/9 32/8 34/20</p> <p>client [1] 11/11</p> <p>clientele [1] 22/12</p> <p>closely [4] 6/16 34/4 34/6 38/9</p> <p>coach [1] 7/9</p> <p>code [2] 7/19 7/20</p> <p>collapse [3] 23/15 47/11 48/14</p> <p>collapsed [2] 48/17 48/21</p> <p>colleagues [1] 44/17</p> <p>come [1] 39/18</p> <p>coming [1] 8/20</p> <p>Commencing [1] 5/1</p> <p>Commissioner [1] 50/13</p> <p>commitment [1] 19/6</p> <p>communal [2] 42/4 42/12</p> <p>community [1] 6/19</p> <p>compared [2] 30/11 42/21</p> <p>complete [1] 4/3</p>
<p>B</p> <p>back [8] 10/16 13/13 13/15 16/13 20/13 20/14 39/18 39/22</p> <p>bandwidth [1] 39/5</p> <p>barriers [1] 17/4</p> <p>based [5] 6/17 16/20 42/19 46/6 46/9</p> <p>bases [1] 16/1</p> <p>basis [9] 7/23 27/14 27/21 34/10 37/9 43/6 43/10 43/12 45/20</p> <p>be [95] 4/2 7/3 7/6 7/10 7/16 7/16 7/18 7/19 7/20 7/22 8/1 8/5 8/9 8/18 8/25 9/2 9/14 9/20 10/1 11/12 12/5 13/5</p>	<p>C</p> <p>calculated [3] 42/18 42/19 42/25</p> <p>calculation [1] 42/24</p> <p>CALDWELL [1] 1/7</p> <p>call [2] 27/5 45/1</p>	<p>A4541</p>

<p>C</p> <p>complexities [1] 18/10 concerns [2] 19/16 42/5 concluded [1] 49/14 conclusions [2] 46/6 46/9 concurrent [1] 48/3 conditions [1] 7/13 conducted [1] 1/21 confident [1] 19/23 confirm [3] 26/23 32/3 46/8 confirming [3] 6/4 25/7 25/19 conflict [1] 42/10 connected [2] 14/15 17/6 connections [2] 14/13 17/7 consider [2] 9/20 15/1 considered [3] 9/14 13/9 14/1 constitute [1] 4/3 consult [1] 5/12 consultation [1] 19/5 context [1] 14/21 continue [1] 35/17 continued [1] 33/23 continues [3] 47/22 48/16 48/19 continuously [1] 9/14 continuum [1] 32/7 contracted [1] 31/5 contracts [1] 31/21 conversation [2] 18/21 18/23 convey [1] 19/19 convinced [1] 35/2 COREY [1] 1/9 correct [17] 5/25 6/8 6/9 13/20 14/2 16/23 16/24 27/24 28/3 28/4 28/14 33/13 33/15 41/14 42/18 46/11 50/1 cost [6] 8/5 8/5 21/19 28/6 28/8 29/22 costs [6] 8/17 8/19 21/18 21/19 28/1 30/1 cots [1] 34/10 couch [1] 9/12 could [17] 6/2 6/22 8/9 11/12 12/22 17/10 21/2 21/3 33/11 41/1 41/2 43/14 43/16 43/23 43/24 43/25 44/25 couldn't [1] 30/9 council [2] 23/13 47/8 counsel [4] 25/11 26/17 42/13 47/4 couple [1] 21/2 course [1] 38/25 COURT [3] 1/1 1/3 50/19 covered [1] 30/19 COVID [4] 20/8 20/14 20/20 20/22 criteria [2] 31/18 31/20 cross [5] 1/20 5/6 10/22 34/6 50/3 Cross-Examination [3] 1/20 5/6 50/3 cross-referencing [1] 10/22 CROWE [3] 2/3 3/4 5/6 CURTIS [1] 2/4 CV [1] 1/1 CV-21-77187 [1] 1/1 CVR [1] 50/8 CVR-RVR [1] 50/8</p>	<p>days [3] 11/4 11/7 11/13 daytime [2] 21/4 46/17 decision [2] 11/1 19/5 dedicated [1] 30/17 dedication [1] 49/3 define [4] 6/19 7/14 8/16 40/13 definition [17] 6/6 6/14 6/20 6/22 9/1 9/2 9/6 9/10 9/11 9/19 9/21 10/13 11/23 15/12 17/19 38/20 38/23 definitions [2] 6/5 6/11 degree [1] 22/8 delay [3] 43/22 44/4 44/10 delegated [1] 23/13 delegates [1] 47/9 delegation [1] 47/7 DELOREY [1] 1/7 deny [1] 17/1 department's [1] 34/5 Depending [1] 11/10 depends [1] 21/1 deposit [2] 28/22 28/23 describe [2] 46/13 46/21 described [2] 15/19 45/17 describes [1] 32/18 describing [5] 8/25 19/11 23/13 26/21 44/9 description [3] 13/14 13/22 32/22 despite [1] 33/24 DIACUR [3] 2/8 3/4 47/6 difference [2] 32/9 32/23 different [6] 16/9 16/10 35/10 38/7 40/15 41/17 differently [1] 40/13 difficult [2] 8/6 23/21 direction [1] 50/16 directly [1] 24/12 Director [1] 23/12 Disability [3] 28/14 29/3 30/8 disclose [4] 25/22 26/3 26/8 26/15 disclosed [1] 26/7 discretion [1] 27/22 discuss [3] 19/25 37/25 38/20 discussed [1] 5/9 discussion [1] 28/6 discussions [1] 11/11 disorders [1] 48/3 displaced [1] 34/21 disruptive [1] 18/5 distinction [3] 26/12 26/15 33/2 do [28] 6/13 12/17 20/5 20/25 21/9 21/10 21/10 22/13 22/25 23/5 23/17 25/11 29/1 29/4 29/9 29/23 31/7 31/11 31/14 31/17 33/6 42/4 43/2 43/9 44/12 45/1 45/8 49/3 document [2] 50/20 50/22 documentation [1] 18/15 documents [2] 5/10 5/12 does [9] 4/2 11/2 20/3 21/25 22/2 28/8 40/3 45/16 47/19 doesn't [5] 15/5 18/11 19/21 24/21 42/23 doing [6] 43/13 44/3 44/25 48/4 48/21 49/8 don't [20] 10/2 14/11 19/20 19/21 25/10 25/22 25/25 26/9 26/14 29/20 30/10 31/16 35/1 35/18 35/23 36/2 37/1 37/21 38/10 39/1 donations [1] 22/10 done [9] 11/2 11/4 11/7 11/12 11/12 11/15 11/18 27/14 27/21</p>	<p>dorm [2] 42/3 42/11 down [1] 10/11 draw [1] 46/6 drawn [1] 25/3 drop [4] 7/5 11/6 12/14 15/8 due [2] 23/21 42/5 duly [1] 5/4 duration [1] 21/1 during [3] 21/4 21/6 21/8</p> <p>E</p> <p>each [3] 12/13 24/2 24/2 earlier [2] 11/12 28/6 effort [1] 45/11 either [3] 15/15 15/21 25/8 elevators [1] 24/5 eligibility [2] 31/18 31/20 eligible [2] 28/2 37/13 else [2] 44/15 45/11 emergency [23] 7/4 15/8 15/25 16/8 22/7 26/22 27/8 32/4 32/6 32/23 32/25 34/5 34/8 37/12 37/14 37/20 37/23 38/7 40/5 40/9 44/2 47/24 48/6 encamp [1] 34/15 encampments [1] 7/7 encourage [1] 45/13 encouraging [1] 35/2 end [3] 39/11 39/11 39/15 endorse [1] 9/7 endorses [1] 9/4 endorsing [1] 6/4 ensure [1] 14/16 entered [2] 11/6 12/10 entitlement [1] 27/23 environment [1] 15/17 especially [1] 41/2 estimate [1] 20/21 et [1] 12/16 et cetera [1] 12/16 even [3] 34/15 36/3 36/23 event [2] 12/2 44/2 events [1] 12/5 ever [11] 12/20 12/24 18/8 19/17 21/5 22/7 37/18 40/7 42/4 44/6 44/23 every [4] 11/18 11/19 20/23 26/24 everybody's [1] 21/18 evicted [1] 9/12 evidence [1] 34/22 exact [2] 35/20 43/8 exactly [1] 25/14 examination [8] 1/20 5/6 5/14 47/5 47/6 49/10 49/14 50/3 example [15] 8/22 14/18 17/5 18/3 18/6 18/13 23/2 27/5 31/5 33/9 37/13 40/17 40/18 41/21 44/16 exceed [1] 28/1 Excel [4] 25/6 25/9 25/24 26/12 exception [2] 27/11 27/21 exceptions [1] 27/3 Executive [1] 23/12 Exhibit [1] 38/17 exhibited [1] 17/8 exhibits [2] 3/7 18/5 exist [7] 15/5 15/6 15/24 16/8 21/25 40/14 48/16 existence [1] 48/2 existing [1] 37/14 expansive [1] 6/14 expected [1] 48/12 expenses [3] 8/7 8/13 8/14</p>
<p>D</p> <p>daily [2] 43/6 43/10 damaged [1] 41/3 damages [1] 41/9 DARRIN [1] 1/6 data [5] 42/18 42/20 43/10 43/22 44/6 database [1] 12/11 dated [1] 1/20 day [4] 21/6 23/4 29/7 29/7</p>		<p>A4542</p>

E experience [1] 48/20 experiencing [6] 21/19 21/20 22/5 46/18 48/25 48/25 explain [1] 38/22 explained [1] 17/18 extent [3] 15/5 15/25 25/18 extenuating [1] 27/15 extremely [1] 23/9	44/12 45/9 45/10 gets [1] 42/25 getting [1] 20/14 give [3] 18/3 19/8 24/17 given [5] 36/11 36/20 45/11 46/3 50/4 giving [2] 36/17 48/23 GLEN [1] 1/8 GNATUK [1] 1/8 go [10] 5/18 16/13 20/5 22/21 27/10 30/12 39/8 41/24 44/1 46/20 GOGO [1] 1/8 GOGO-HORNER [1] 1/8 going [9] 5/9 13/15 18/11 23/3 24/2 30/12 31/23 35/17 38/14 gone [1] 23/2 Good [4] 5/7 23/13 31/6 33/1 GORD [1] 1/6 got [6] 10/18 10/23 36/25 37/1 39/15 44/14 Government [1] 9/5 Gowling [1] 2/10 Great [1] 5/17 GREAVES [1] 1/11 guide [2] 3/12 4/2 guidelines [1] 19/12 gyms [1] 34/9	HEREINBEFORE [1] 5/3 Hey [1] 18/24 HIFIS [12] 12/10 12/23 25/4 25/8 26/3 26/12 42/18 42/20 43/3 44/18 44/22 44/6 high [14] 13/9 13/9 13/10 13/11 14/1 17/1 17/5 17/11 17/12 17/19 23/7 23/9 30/17 30/22 higher [11] 8/5 14/11 14/12 14/25 15/1 27/19 30/2 30/4 30/5 30/10 48/1 him [2] 44/13 44/14 his [1] 36/25 history [1] 42/9 hmm [13] 16/22 17/21 17/24 25/5 30/23 30/25 32/17 33/22 34/3 38/2 40/12 46/5 46/15 hoc [2] 37/8 37/9 hold [1] 45/4 holding [1] 45/13 homeless [3] 7/15 9/15 9/20 homelessness [13] 5/23 6/7 6/7 6/15 6/20 9/1 9/3 9/10 10/14 12/14 15/6 23/8 46/18 homes [1] 32/12 honest [7] 20/16 24/16 29/14 31/22 39/2 39/3 44/22 horn [1] 49/6 HORNER [1] 1/8 hosted [1] 1/21 hotel [1] 37/19 hotels [3] 37/8 37/11 37/16 hour [2] 27/14 45/9 hours [4] 21/3 21/3 21/4 21/8 house [1] 32/20 housed [4] 7/16 12/1 14/14 14/22 household [1] 28/2 housing [22] 5/23 7/17 7/24 8/25 9/6 10/4 11/25 14/16 14/21 15/3 15/9 15/18 16/10 26/22 27/7 27/8 32/7 32/21 32/24 32/25 33/4 48/10 how [13] 11/14 19/25 20/5 20/21 20/25 21/15 22/2 23/24 31/14 43/2 43/9 45/16 48/22 human [1] 23/9 hydro [2] 8/17 28/11
F facilities [4] 32/2 32/3 32/9 32/11 facility [2] 32/20 36/23 fair [7] 13/25 25/10 25/13 25/23 26/6 27/13 46/16 fairly [1] 42/22 families [5] 37/8 37/13 37/17 41/20 42/1 family [10] 8/1 27/20 34/14 41/6 41/11 41/15 41/17 41/21 41/24 41/25 faster [1] 39/7 few [3] 21/3 24/5 24/24 field [1] 22/22 figure [1] 8/20 FILE [1] 1/1 find [2] 39/4 39/4 fine [8] 31/23 35/5 35/19 36/6 36/8 37/2 39/8 47/15 fine-tune [1] 35/5 finite [1] 21/16 fire [9] 33/20 33/24 34/2 34/22 35/7 35/9 35/13 35/14 36/14 first [6] 6/13 18/2 18/9 25/17 28/19 28/22 fit [1] 27/8 flag [2] 18/18 18/19 fluidity [1] 39/24 focus [1] 13/21 follow [2] 9/7 9/9 following [3] 35/7 35/9 36/13 follows [1] 5/5 food [1] 8/7 foregoing [1] 50/1 formed [1] 26/21 forward [1] 38/14 found [1] 10/12 four [1] 41/24 frequent [1] 14/13 friends [2] 7/9 34/13 front [1] 5/10 frontline [2] 24/21 49/4 full [3] 29/11 42/5 50/1 fund [5] 21/15 26/22 26/23 27/8 28/2 funded [11] 12/13 14/8 14/9 15/10 16/8 20/5 30/16 38/7 38/18 39/19 48/12 funding [5] 21/10 21/13 21/16 21/25 22/10 funds [2] 27/11 27/13 further [2] 35/6 36/4 future [1] 17/16	H had [10] 12/2 28/6 35/6 35/12 35/18 36/13 36/17 36/22 36/23 42/10 HAMILTON [5] 1/16 2/7 21/14 28/17 29/23 Hamilton's [2] 23/14 23/24 happen [7] 17/14 18/12 19/2 19/7 19/21 20/3 45/16 happened [6] 18/15 18/22 18/24 19/2 19/14 19/22 happening [8] 11/11 19/18 19/21 42/7 45/6 45/12 45/19 45/21 happens [2] 21/21 41/2 hard [1] 18/6 has [18] 9/3 11/16 12/12 17/4 17/11 19/14 22/14 25/19 26/8 30/16 32/20 33/23 41/3 41/15 48/17 48/19 48/21 50/20 hasn't [1] 26/7 have [55] 5/9 5/12 10/2 10/12 12/17 12/20 14/8 17/18 18/6 18/23 19/17 20/13 21/14 22/13 23/2 23/5 23/20 24/4 24/7 24/9 24/9 24/14 24/15 24/21 25/11 25/21 27/6 29/1 29/8 29/14 29/19 30/19 31/7 31/12 31/13 31/14 31/17 31/19 31/20 33/10 37/21 38/3 38/11 38/18 39/1 39/3 41/3 42/10 43/9 43/24 43/25 44/1 45/1 45/8 47/5 haven't [3] 25/7 31/19 44/13 having [2] 5/4 20/12 he [7] 13/7 26/7 35/20 36/15 36/15 36/17 42/13 he's [3] 35/15 36/20 42/14 head [3] 12/19 29/25 31/10 health [6] 15/10 17/7 22/6 23/22 48/2 48/9 hear [1] 19/21 heard [3] 19/17 42/7 42/14 HEEGSMA [1] 1/6 held [2] 44/23 44/24 help [4] 14/3 14/16 22/10 39/10 here [5] 18/24 19/20 20/2 32/10 39/23 hereby [1] 50/1	I I'd [1] 29/19 I'll [1] 39/8 I'm [29] 5/16 6/4 13/1 13/1 13/5 17/17 18/11 19/19 19/22 19/23 20/7 21/2 25/17 25/19 28/18 29/6 30/2 30/20 31/9 32/10 39/22 40/23 43/12 44/9 44/11 44/12 47/14 48/22 48/23 I've [2] 24/11 44/18 ICM [1] 31/6 idea [1] 43/9 if [19] 5/17 6/2 6/22 11/5 13/6 27/6 29/10 31/11 35/16 36/23 37/1 39/5 41/15 41/21 41/23 42/9 43/12 44/11 44/16 impact [3] 17/20 22/3 22/13 implement [1] 22/11 impression [1] 34/21 in [112] 1/20 5/10 5/15 5/16 6/5 6/5 6/7 7/3 7/4 7/6 7/11 7/20 9/13 9/19 10/6 10/13 11/6 11/17 11/21 11/21 12/22 14/15 14/21 15/16 15/21 16/6 16/14 17/8 17/9 18/2 18/14 18/15 18/19 18/25 19/23 19/25 20/7 20/8 20/13
G gap [1] 44/19 gas [2] 8/17 28/11 gathering [1] 25/16 general [2] 16/6 21/19 generally [8] 11/7 11/9 20/12 21/6 29/6 31/9 31/13 41/19 gentlemen [1] 34/11 get [8] 11/2 17/17 22/21 22/23 30/20		A4543

<p>I</p> <p>in... [73] 20/18 21/15 21/25 22/15 22/24 23/7 23/8 23/11 23/21 24/8 24/10 24/21 25/1 25/2 25/20 26/3 26/11 27/1 27/5 27/7 27/7 28/2 28/5 28/7 28/15 28/16 28/24 29/7 29/23 30/4 30/5 30/7 32/15 33/19 34/11 35/21 36/24 37/8 37/23 38/17 39/21 40/6 40/14 41/2 41/11 41/13 41/16 41/21 42/1 42/1 43/4 43/8 43/16 43/18 43/22 43/24 44/1 44/3 44/4 44/10 44/13 44/13 44/14 44/17 44/19 44/24 46/7 46/13 46/16 47/22 49/1 49/10 50/16</p> <p>inaccurate [3] 44/7 44/8 44/21</p> <p>inadequate [1] 7/12</p> <p>Inc [2] 1/22 50/21</p> <p>include [4] 8/15 8/18 8/19 28/9</p> <p>included [3] 6/5 25/20 28/5</p> <p>includes [1] 28/10</p> <p>including [1] 6/6</p> <p>income [8] 8/5 8/10 8/13 16/3 16/4 16/5 28/2 28/17</p> <p>increased [2] 21/18 21/19</p> <p>index [1] 10/25</p> <p>indicated [3] 6/25 25/2 33/19</p> <p>indicates [1] 5/22</p> <p>indication [1] 50/20</p> <p>Indigenous [8] 6/7 6/15 6/17 6/17 9/3 9/10 9/11 10/14</p> <p>individual [22] 7/22 8/4 9/12 14/13 14/18 14/21 17/1 17/3 17/4 17/11 18/21 26/4 26/4 26/16 27/2 29/10 30/4 30/5 30/7 44/25 45/7 46/21</p> <p>individual's [3] 11/21 16/21 17/2</p> <p>individuals [26] 7/16 14/1 14/5 14/10 14/14 14/16 15/2 15/20 22/5 22/16 23/20 28/15 28/24 30/18 30/22 33/6 33/24 34/1 35/3 35/6 35/8 35/10 42/11 44/23 48/1 48/5</p> <p>information [10] 12/21 25/3 25/8 25/16 36/5 43/14 43/15 43/18 44/5 44/10</p> <p>infractions [1] 7/21</p> <p>inputting [10] 43/10 43/11 43/13 43/14 43/15 43/16 43/17 43/22 44/4 44/10</p> <p>ins [3] 7/5 12/14 15/8</p> <p>insist [1] 35/24</p> <p>instance [1] 18/9</p> <p>intake [3] 43/13 44/25 45/2</p> <p>intended [4] 22/7 43/19 43/20 48/6</p> <p>intensive [7] 12/15 14/4 14/6 14/7 15/24 16/10 31/1</p> <p>interacted [1] 24/11</p> <p>interactions [1] 11/10</p> <p>interested [3] 34/18 34/24 35/4</p> <p>Internet [2] 8/15 8/18</p> <p>interpretation [1] 8/3</p> <p>intervention [1] 14/4</p> <p>into [6] 12/10 20/9 22/22 42/20 43/10 43/22</p> <p>is [138] 6/8 6/13 6/14 6/19 7/2 7/18 7/24 8/20 9/3 9/6 9/10 9/18 9/24 10/10 11/4 11/7 11/12 11/23 12/4 12/10 13/7 13/18 13/25 14/11 14/13 14/16 14/18 14/21 14/24 15/1 15/3 15/3 15/4 15/9 15/20 16/1 16/1 16/2 16/10 16/15 16/25 17/3 17/11 17/12 17/12 18/4 18/9 18/13 18/24 19/11 19/12 19/19 21/13 21/17 25/10 25/16 25/20 26/11 26/11 26/14 26/23 26/25 27/1 27/4</p>	<p>27/13 27/14 27/16 27/21 27/23 28/2 28/5 28/8 28/12 28/15 28/18 28/20 28/22 28/23 30/3 30/11 32/8 32/10 32/19 32/22 32/25 33/2 33/9 33/10 33/12 33/25 36/17 37/9 37/18 38/7 39/5 40/2 40/2 40/3 40/7 40/8 40/8 40/14 40/15 40/19 40/23 40/24 41/12 41/23 41/24 42/9 42/11 42/17 42/22 43/8 43/19 43/20 43/21 44/10 44/17 44/18 44/19 45/2 45/2 45/3 45/18 45/23 46/16 46/23 46/25 47/10 47/18 47/19 48/1 48/22 49/3 50/1 50/20 50/22</p> <p>isn't [1] 41/15</p> <p>issuance [1] 27/16</p> <p>issue [1] 27/11</p> <p>issues [1] 19/15</p> <p>issuing [3] 27/13 27/16 27/19</p> <p>it [94] 5/22 7/11 7/16 7/18 7/19 7/20 8/6 8/6 9/10 10/18 10/23 11/4 11/6 11/12 11/12 12/4 13/25 14/11 14/24 15/5 16/15 16/25 17/10 17/12 18/11 18/12 19/2 19/20 20/2 20/20 21/1 21/2 21/3 22/1 22/22 25/15 27/10 27/13 27/23 28/8 28/10 28/15 29/8 29/21 32/23 32/24 35/1 35/4 35/18 35/22 36/5 36/24 37/18 38/21 38/21 39/1 39/4 39/4 39/5 39/6 39/6 39/7 39/10 39/15 39/19 40/7 40/9 40/13 41/2 41/5 41/7 41/24 42/14 42/23 43/7 43/7 43/15 43/16 43/19 43/20 44/4 44/19 45/7 45/9 45/18 45/22 46/16 47/10 47/12 48/2 48/19 48/19 48/20 49/8</p> <p>it's [43] 10/21 11/18 11/20 12/21 17/13 17/18 17/22 19/14 19/22 23/1 24/20 24/24 25/13 25/18 25/23 26/6 26/9 26/17 26/17 26/25 27/17 29/7 29/11 29/17 32/25 33/2 33/4 35/16 37/3 37/4 39/10 40/24 41/7 42/24 44/8 44/21 44/21 45/11 45/23 48/15 48/21 48/24 49/2</p> <p>items [1] 15/23</p> <p>itself [1] 36/23</p> <p>J</p> <p>JAHMAL [1] 1/10</p> <p>January [2] 38/19 50/17</p> <p>January 2020 [1] 38/19</p> <p>job [2] 12/3 22/23</p> <p>JOHNSON [1] 2/9</p> <p>JOJO [1] 2/9</p> <p>JORDAN [6] 1/8 2/8 35/23 44/11 44/13 44/19</p> <p>Jordan's [1] 13/6</p> <p>JULIA [1] 1/9</p> <p>JULIA LAUZON [1] 1/9</p> <p>July [13] 1/20 5/11 5/22 10/7 10/11 10/17 16/13 25/1 30/13 45/25 46/10 47/11 47/15</p> <p>July 2023 [1] 47/11</p> <p>July 2024 [3] 10/17 16/13 25/1</p> <p>July 31st [3] 5/11 5/22 46/10</p> <p>June [3] 38/19 46/4 46/10</p> <p>June 2024 [3] 38/19 46/4 46/10</p> <p>just [27] 6/4 6/21 7/20 8/22 9/2 9/9 9/23 13/5 15/12 18/3 19/1 20/13 20/14 21/19 25/7 25/17 28/8 30/20 32/2 34/20 35/5 39/22 44/22 45/17 46/8 47/12 48/23</p> <p>JUSTICE [2] 1/3 50/17</p>	<p>K</p> <p>keep [1] 35/24</p> <p>kept [2] 12/9 26/13</p> <p>kind [15] 7/21 8/24 9/7 15/3 19/4 19/17 20/14 20/14 22/25 24/2 24/5 33/1 33/16 43/18 44/22</p> <p>knew [1] 23/3</p> <p>know [56] 5/17 6/13 6/18 7/18 8/4 8/6 8/9 10/21 12/3 13/3 13/6 14/8 15/9 16/16 17/6 17/18 18/4 18/5 18/18 19/5 19/7 19/8 19/16 19/23 20/8 20/15 21/17 21/22 22/9 22/21 23/2 25/15 28/11 29/7 29/9 29/23 30/3 30/10 31/11 34/25 35/23 37/1 37/21 38/21 39/5 39/22 40/4 41/2 41/9 43/14 44/16 45/1 45/7 48/8 48/14 49/7</p> <p>knowing [1] 44/18</p> <p>knowledge [9] 12/17 22/13 23/5 29/1 31/7 31/14 31/17 42/6 46/25</p> <p>known [4] 17/1 18/4 18/10 19/15</p> <p>KRISTEN [1] 1/6</p> <p>L</p> <p>labour [1] 21/19</p> <p>lack [3] 18/18 19/9 46/17</p> <p>language [1] 38/22</p> <p>last [19] 9/16 13/21 13/24 15/21 16/18 18/15 18/23 18/24 19/2 20/17 24/18 25/2 27/7 28/19 28/23 35/21 37/2 41/4 48/11</p> <p>later [1] 43/15</p> <p>LAUZON [1] 1/9</p> <p>lease [1] 10/2</p> <p>leases [2] 33/7 33/16</p> <p>least [1] 20/9</p> <p>leave [8] 35/7 35/8 35/11 36/13 36/16 36/17 36/22 36/23</p> <p>left [4] 8/12 22/4 37/22 40/21</p> <p>legal [2] 10/2 10/3</p> <p>let [4] 5/17 16/15 18/3 18/3</p> <p>Let's [2] 18/23 26/20</p> <p>level [13] 8/6 13/23 13/23 13/25 14/12 14/12 15/13 15/19 16/7 17/5 22/1 46/7 47/25</p> <p>levels [1] 46/4</p> <p>LEWIS [1] 1/9</p> <p>licensed [2] 32/9 32/13</p> <p>life [1] 12/2</p> <p>lifetime [1] 27/5</p> <p>like [83] 6/10 6/17 7/19 8/7 8/8 8/15 8/17 10/2 10/2 10/14 11/18 11/19 12/2 12/3 12/22 13/1 13/2 14/17 14/21 15/7 15/8 15/23 16/3 16/9 17/6 18/13 18/14 18/19 18/22 18/23 19/8 19/11 19/21 19/25 20/1 20/9 20/12 22/5 22/10 22/19 22/20 22/25 23/3 24/12 24/17 24/21 24/22 25/15 27/5 27/10 27/21 28/9 29/6 30/3 30/24 31/1 32/24 32/25 33/7 34/8 34/9 34/10 38/10 38/21 40/3 40/13 41/10 41/22 42/1 42/24 43/7 43/12 43/16 44/2 44/9 44/19 44/24 45/2 45/3 45/13 45/14 45/23 45/24</p> <p>likely [2] 22/17 30/2</p> <p>limitations [1] 21/15</p> <p>limited [1] 21/13</p> <p>line [2] 24/2 24/2</p> <p>LINSLEY [1] 1/10</p> <p>list [1] 4/3</p> <p>listed [1] 40/8</p> <p>little [1] 35/6</p>
--	---	--

<p>L</p> <p>live [2] 43/19 43/20 lived [2] 9/13 9/17 living [7] 7/6 7/9 7/11 21/20 28/16 34/11 48/5 LLP [1] 2/10 locate [1] 39/7 location [4] 10/4 24/3 41/20 42/21 locations [4] 7/5 34/10 37/16 41/3 long [4] 20/25 31/14 33/7 33/8 long-term [2] 33/7 33/8 longer [5] 14/17 14/19 33/11 43/21 45/18 look [9] 6/22 24/15 29/8 29/14 29/19 29/20 31/21 39/6 44/18 looked [1] 31/19 looking [3] 7/23 10/9 22/9 looks [1] 10/14 lost [3] 11/25 12/3 12/3 lot [2] 10/21 49/3 low [1] 28/17</p>	<p>MICHELLE [1] 2/5 mid [1] 14/1 might [11] 7/10 7/19 7/20 8/1 8/18 12/5 17/4 22/6 38/21 39/6 41/7 Mihailovich [2] 1/21 50/21 ministry [2] 15/10 38/8 minute [2] 43/21 44/15 minutes [1] 43/15 Mission [2] 31/5 33/1 MISTY [1] 1/10 mix [2] 41/20 42/1 Mm [13] 16/22 17/21 17/24 25/5 30/23 30/25 32/17 33/22 34/3 38/2 40/12 46/5 46/15 Mm-hmm [13] 16/22 17/21 17/24 25/5 30/23 30/25 32/17 33/22 34/3 38/2 40/12 46/5 46/15 moment [3] 43/8 43/16 44/4 MONAHAN [1] 1/9 month [8] 20/19 20/23 27/2 27/12 27/20 38/19 39/20 46/4 month's [3] 28/19 28/22 28/23 months [8] 11/19 11/19 20/24 26/24 27/1 27/7 27/17 46/19 more [8] 6/14 7/24 7/25 7/25 14/13 15/24 27/13 42/4 morning [1] 5/7 most [5] 10/17 14/15 24/4 24/4 24/6 move [5] 26/20 31/23 36/8 37/2 37/4 moving [5] 10/16 22/22 37/7 37/25 41/5 MR [3] 3/4 5/7 47/6 Mr. [3] 26/11 35/23 36/12 Mr. Jordan [1] 35/23 Mr. Mastroianni [1] 26/11 Mr. Mastroianni's [1] 36/12 MS [2] 3/4 5/6 much [4] 21/15 47/2 48/1 49/13 multiple [2] 41/13 43/24 MUSCATO [1] 1/7 my [34] 5/16 6/13 7/15 12/19 12/22 15/14 17/16 19/19 21/8 22/15 24/20 29/25 31/10 32/19 32/22 33/10 33/18 34/20 36/2 36/3 38/5 41/12 42/6 43/13 43/15 43/17 44/16 46/25 47/3 47/19 48/23 49/9 50/2 50/3</p>	<p>42/8 45/18 47/2 47/15 48/19 48/20 48/23 nobody [1] 36/13 nobody's [1] 12/24 None [2] 4/6 4/9 nonetheless [1] 40/9 normal [1] 18/12 normally [2] 27/9 37/13 not [72] 4/2 7/19 11/9 11/18 11/18 11/20 12/5 12/19 12/21 14/18 15/4 15/7 16/7 17/2 17/12 17/18 17/18 18/11 18/18 19/22 20/3 20/7 20/11 21/12 21/25 22/7 22/20 23/1 24/6 24/11 25/18 25/20 26/6 26/17 26/25 27/16 29/7 29/25 32/5 32/12 32/22 32/25 33/2 34/14 34/18 34/22 34/23 35/1 35/3 35/4 35/11 36/3 36/7 36/17 36/24 40/24 40/24 41/19 42/4 42/6 42/24 44/18 46/25 48/6 48/8 48/9 48/12 48/19 48/21 49/6 50/18 50/22 note [1] 18/14 noted [2] 4/6 4/9 notes [4] 5/12 13/2 18/17 50/2 now [8] 13/7 20/7 20/11 24/17 30/1 30/11 43/7 43/17 number [15] 10/14 14/8 14/10 24/10 27/17 31/10 32/11 32/12 34/1 39/19 40/14 42/20 42/21 42/22 47/23 number 4 [1] 10/14</p>
<p>M</p> <p>MACDONALD [1] 1/9 made [3] 25/14 36/16 47/9 maintain [1] 8/7 maintained [1] 14/17 maintaining [1] 16/3 make [4] 19/1 27/10 34/15 45/10 makes [2] 8/6 45/15 making [1] 26/11 manage [1] 20/1 management [12] 11/11 12/15 14/4 14/6 14/7 14/12 15/24 16/1 16/10 18/17 18/22 31/2 manager [3] 5/23 24/12 24/22 managing [3] 18/7 22/16 22/18 many [2] 20/9 23/24 March [5] 23/11 47/13 47/15 47/18 48/18 March 2023 [4] 23/11 47/15 47/18 48/18 MARCHAND [1] 1/6 MARIO [1] 1/6 market [1] 30/10 MARSHALL [1] 1/10 MASTROIANNI [3] 3/3 5/2 50/4 Mastroianni [3] 1/20 5/7 26/11 Mastroianni's [1] 36/12 maximum [5] 26/25 27/1 27/6 27/9 27/20 may [10] 7/16 7/18 17/5 17/8 22/25 29/12 37/21 37/22 39/10 40/18 maybe [3] 28/18 30/19 40/20 me [17] 5/4 5/8 5/17 5/18 10/14 13/6 14/3 16/16 18/3 18/3 38/22 39/4 39/7 43/17 43/18 45/9 50/4 mean [1] 40/3 meaning [1] 33/24 means [6] 8/3 32/24 37/9 38/23 40/4 40/19 meant [2] 7/2 9/24 medical [1] 44/2 meeting [1] 5/8 meetings [2] 20/12 21/1 mental [5] 17/7 22/5 23/21 48/2 48/8 mention [1] 10/7 mentioned [2] 14/20 37/7 mentions [4] 7/11 32/1 38/17 39/19 met [3] 24/7 24/14 24/18</p>	<p>N</p> <p>name [2] 24/15 24/17 NAMED [1] 5/3 Narcan [3] 22/20 22/25 23/3 narrow [1] 28/7 national [1] 9/6 necessarily [11] 4/3 7/14 8/24 11/18 16/7 22/20 23/1 24/12 24/21 29/20 42/23 need [2] 5/17 21/24 needed [1] 15/20 needs [1] 15/5 never [6] 16/25 19/14 22/17 25/13 42/7 42/14 new [3] 11/5 41/6 41/6 newly [1] 26/21 next [3] 15/14 32/15 39/21 night [1] 21/5 Nimigan [2] 1/21 50/21 no [30] 1/1 8/22 10/15 10/24 15/19 16/19 17/15 17/15 19/20 20/2 20/3 21/6 21/11 27/16 27/23 29/25 31/16 34/21 36/16 39/15 40/4 40/21 41/19</p>	<p>O</p> <p>o'clock [1] 45/4 O.R [1] 50/17 oath [2] 5/5 50/4 Oaths [1] 50/13 obviously [1] 21/18 occupancy [10] 33/17 40/11 42/19 42/25 43/4 43/6 43/8 44/7 46/3 46/7 occupied [5] 40/15 40/18 40/20 40/24 41/5 occupy [1] 40/21 occur [2] 17/6 43/12 occurring [1] 17/11 October [6] 5/10 6/6 6/11 10/15 13/14 13/16 October 2021 [3] 10/15 13/14 13/16 October 6, 2021 [2] 6/6 6/11 ODSP [5] 28/16 28/25 29/13 29/20 30/11 off [5] 12/19 29/25 30/20 31/10 39/9 offer [4] 21/23 21/23 34/25 42/3 office [1] 5/16 offices [1] 1/21 offline [1] 41/9 often [10] 11/14 15/9 20/5 20/7 20/11 20/21 42/23 43/2 43/9 45/16 OGDEN [1] 1/10 oh [5] 24/20 36/1 39/12 39/15 44/18 okay [83] 5/9 5/13 5/19 5/20 5/21 5/21 6/1 6/3 6/12 6/21 6/24 7/8 7/11 8/2 8/11 8/14 8/20 8/23 9/8 9/23 10/5 10/18 10/21 11/14 12/8 12/12 12/17 13/8 13/17 14/20 15/14 16/12 16/13 18/22 20/4 20/20 20/25 21/7 23/5 23/11 24/7 24/14 24/18 24/23 24/25 26/20 27/22 27/25 28/5 28/12 28/18 29/1 29/5 29/13 29/18 30/7 30/12 30/14 31/11 31/17 31/23 31/25 32/14 33/8 34/20 35/12 35/14 35/25 37/18 38/14 38/16 39/8 40/1 40/7 40/23</p>

<p>O</p> <p>okay... [8] 42/17 43/1 44/6 45/5 45/15 45/25 47/2 49/12</p> <p>on [44] 1/20 5/5 6/17 7/22 11/10 13/21 16/20 16/20 19/25 20/15 21/1 22/14 22/22 22/23 23/14 26/20 27/14 27/21 28/13 28/20 29/10 31/24 32/15 34/10 35/24 36/8 37/2 37/4 37/8 39/6 39/18 42/19 43/6 43/9 43/11 45/19 46/6 46/9 46/20 47/10 47/17 48/14 49/7 50/4</p> <p>on-site [1] 20/15</p> <p>once [8] 14/21 20/9 20/21 20/23 20/23 26/24 27/5 27/14</p> <p>one [16] 17/16 20/18 23/4 24/2 24/18 26/25 29/23 34/21 36/17 37/2 40/19 41/9 41/13 41/20 41/25 44/16</p> <p>one-bedroom [1] 29/23</p> <p>ongoing [2] 7/23 42/24</p> <p>only [9] 8/12 11/16 26/23 28/20 28/22 28/23 41/8 42/10 47/4</p> <p>ONTARIO [9] 1/2 28/13 28/14 28/16 29/2 29/3 30/4 30/6 30/8</p> <p>Ontario Disability [2] 28/14 30/8</p> <p>Ontario Works [2] 30/4 30/6</p> <p>open [1] 28/15</p> <p>operate [1] 31/4</p> <p>operates [1] 38/6</p> <p>operating [4] 37/23 38/4 48/24 49/2</p> <p>operations [3] 22/3 44/22 45/14</p> <p>opinion [2] 22/15 48/23</p> <p>or [84] 5/12 5/18 7/15 7/23 8/5 8/6 10/2 10/3 10/4 11/5 11/6 11/11 11/15 11/19 11/19 12/3 13/9 14/25 15/1 15/8 15/8 15/10 15/10 15/16 15/22 16/3 16/4 16/8 17/3 17/6 17/7 17/8 17/17 17/19 18/17 18/20 19/5 19/6 19/8 19/12 19/15 21/1 21/23 22/10 22/15 22/19 23/22 24/12 25/8 25/14 27/8 28/8 28/16 28/23 31/8 33/1 33/16 34/15 34/23 35/2 37/13 37/17 37/22 38/1 38/4 38/10 38/23 39/4 39/14 39/20 40/20 40/21 41/6 41/8 41/9 43/16 44/2 44/2 44/13 45/2 45/13 45/23 48/12 48/12</p> <p>oral [1] 50/2</p> <p>order [1] 28/2</p> <p>original [3] 25/3 50/18 50/22</p> <p>other [18] 5/12 5/12 7/5 7/23 8/7 8/13 8/14 15/10 16/4 17/13 22/10 22/24 28/9 33/9 33/16 34/7 34/10 41/9</p> <p>our [21] 12/10 12/13 12/13 12/25 13/8 15/6 19/23 19/24 21/24 24/10 24/10 27/4 31/21 34/5 37/12 40/6 45/14 47/21 49/1 49/6 49/8</p> <p>out [4] 15/4 15/4 21/15 41/5</p> <p>over [3] 24/9 27/10 38/4</p> <p>overall [1] 23/8</p> <p>overdoses [1] 22/19</p> <p>overflow [1] 37/12</p> <p>overnight [1] 46/17</p> <p>oversee [1] 38/10</p> <p>oversees [1] 32/2</p> <p>OW [3] 28/25 29/10 30/6</p> <p>own [3] 32/6 34/15 49/6</p>	<p>26/21 30/12 31/24 32/1 32/15 33/20 37/7 37/25 38/15 38/17 39/21 45/25 46/7 46/13 46/20</p> <p>paragraph 10 [1] 26/21</p> <p>paragraph 12 [1] 30/12</p> <p>paragraph 16 [2] 31/24 32/1</p> <p>paragraph 17 [1] 32/15</p> <p>paragraph 18 [1] 37/7</p> <p>paragraph 19 [2] 13/16 37/25</p> <p>paragraph 27 [1] 38/15</p> <p>Paragraph 28 [1] 45/25</p> <p>paragraph 29 [1] 46/7</p> <p>paragraph 34 [1] 46/13</p> <p>Paragraph 35 [1] 46/20</p> <p>paragraph 4 [4] 6/1 6/22 10/6 10/10</p> <p>paragraph 6 [2] 25/1 26/11</p> <p>part [13] 6/18 8/19 8/25 9/16 11/7 13/3 22/23 28/12 28/19 32/5 45/14 48/8 48/9</p> <p>particular [2] 18/4 40/5</p> <p>partner [1] 12/3</p> <p>partners [2] 6/17 34/7</p> <p>PATRICK [1] 1/11</p> <p>paying [1] 8/10</p> <p>people [13] 6/20 7/6 22/21 28/13 28/20 33/11 36/19 37/17 41/24 42/20 43/24 46/18 47/23</p> <p>per [5] 8/10 8/12 8/20 20/2 28/1</p> <p>period [6] 27/2 27/12 27/21 34/15 44/15 46/9</p> <p>periods [1] 27/14</p> <p>permanent [4] 15/2 15/18 16/10 48/9</p> <p>permanently [1] 7/23</p> <p>permission [1] 50/21</p> <p>person [10] 17/12 18/5 18/20 19/8 20/13 29/2 41/5 41/6 41/25 45/3</p> <p>person's [3] 11/17 18/15 19/6</p> <p>personally [2] 8/23 12/21</p> <p>phone [2] 45/2 45/2</p> <p>physical [1] 24/3</p> <p>PIERRE [1] 1/10</p> <p>place [5] 12/5 18/2 21/25 33/21 37/8</p> <p>plain [1] 38/22</p> <p>plans [1] 24/3</p> <p>please [3] 5/17 6/2 6/23</p> <p>point [7] 10/6 10/8 10/11 11/2 16/15 16/15 35/5</p> <p>point 3 [1] 16/15</p> <p>policy [2] 19/12 27/4</p> <p>population [1] 21/24</p> <p>portion [1] 39/9</p> <p>posed [2] 36/10 37/3</p> <p>position [1] 16/25</p> <p>possible [2] 12/4 37/10</p> <p>post [2] 20/14 20/22</p> <p>post-COVID [2] 20/14 20/22</p> <p>pot [1] 21/16</p> <p>potentially [2] 19/12 33/11</p> <p>practically [1] 22/2</p> <p>practice [3] 18/13 19/11 45/23</p> <p>precarious [2] 7/17 8/24</p> <p>prep [1] 13/3</p> <p>presence [1] 20/15</p> <p>present [1] 46/4</p> <p>presenting [1] 43/12</p> <p>presents [1] 18/20</p> <p>pressure [2] 47/22 48/15</p> <p>pressures [1] 48/20</p> <p>prevailing [1] 18/1</p> <p>prevent [1] 45/12</p>	<p>prevents [1] 45/7</p> <p>previous [1] 42/10</p> <p>prior [1] 20/8</p> <p>prioritization [1] 11/1</p> <p>private [3] 5/15 41/20 42/2</p> <p>probably [5] 7/22 15/23 20/9 20/23 24/24</p> <p>problem [1] 10/24</p> <p>produced [1] 25/7</p> <p>program [12] 28/7 28/12 28/19 29/3 32/11 32/19 32/24 32/24 33/4 33/10 34/6 37/19</p> <p>programs [15] 12/13 12/15 14/7 15/16 15/22 30/17 30/21 31/2 31/3 31/4 31/6 31/8 31/11 31/18 33/3</p> <p>promised [2] 44/19 45/9</p> <p>promote [1] 45/6</p> <p>promoting [1] 35/2</p> <p>provide [3] 15/9 32/20 49/5</p> <p>provided [1] 25/2</p> <p>providers [1] 47/8</p> <p>provides [1] 10/3</p> <p>Province [2] 15/10 21/14</p> <p>pull [1] 38/24</p> <p>pulling [1] 13/2</p> <p>pulls [1] 44/3</p> <p>purpose [1] 21/2</p> <p>purposes [3] 5/14 25/14 28/7</p> <p>put [4] 18/14 21/24 26/6 41/25</p> <p>Q</p> <p>question [12] 6/13 15/15 25/11 25/23 26/17 35/16 35/17 35/21 36/10 36/15 37/3 47/19</p> <p>question three [1] 35/16</p> <p>questions [5] 5/18 17/16 36/4 47/3 49/10</p> <p>quickly [1] 39/23</p> <p>quite [1] 24/20</p> <p>quote [4] 29/21 31/10 33/23 47/10</p> <p>quoting [1] 29/8</p> <p>R</p> <p>raising [1] 36/3</p> <p>ramping [1] 20/15</p> <p>ramps [1] 24/5</p> <p>random [1] 41/25</p> <p>range [1] 30/24</p> <p>ranges [1] 15/21</p> <p>rapid [3] 12/14 31/2 31/6</p> <p>rapidly [1] 39/25</p> <p>rate [5] 23/7 23/10 29/8 30/11 30/11</p> <p>rates [4] 29/1 29/5 29/20 30/10</p> <p>RCFs [1] 32/13</p> <p>re [3] 47/5 47/6 49/10</p> <p>re-examination [3] 47/5 47/6 49/10</p> <p>reading [1] 34/21</p> <p>reads [1] 36/13</p> <p>realities [1] 44/22</p> <p>really [2] 6/16 15/3</p> <p>Realtime [1] 50/12</p> <p>reason [1] 17/3</p> <p>receipt [6] 28/16 28/16 28/24 30/4 30/5 30/7</p> <p>receive [3] 21/9 21/16 27/2</p> <p>received [2] 27/6 27/9</p> <p>receives [2] 21/14 30/6</p> <p>receiving [1] 29/11</p> <p>recent [2] 10/17 33/24</p> <p>recently [3] 11/25 31/20 33/21</p>
<p>P</p> <p>page [6] 3/2 32/15 39/11 39/14 39/14 39/15</p> <p>paragraph [25] 6/1 6/22 10/6 10/10 13/16 16/14 16/15 25/1 26/5 26/11</p>		<p>A4546</p>

S	systems [1] 15/25	47/17 47/19 47/23 48/1 48/4 48/5 48/7 48/13 48/13 48/16 48/16 49/3 49/4 49/7
someone... [3] 37/18 40/8 41/17 something [18] 7/18 7/24 9/3 10/3 11/19 12/3 15/7 22/21 23/1 26/7 34/17 41/10 44/2 44/3 44/12 44/15 45/23 47/1 sometimes [2] 11/9 41/12 somewhere [2] 7/21 8/21 sorry [16] 9/16 10/8 10/8 10/10 10/18 15/19 28/23 29/6 34/7 35/7 38/24 39/12 39/22 47/12 47/14 48/22 source [1] 8/5 sources [2] 16/4 22/10 space [13] 34/19 34/25 35/3 35/10 35/11 37/15 38/23 40/19 42/12 45/1 45/8 48/1 48/6 spaces [4] 31/8 37/15 46/17 47/24 SPDAT [7] 10/7 10/25 11/2 12/9 12/18 12/25 13/15 speak [1] 45/20 speaking [2] 22/2 40/10 specific [3] 14/9 19/22 47/1 specifically [4] 7/2 8/21 26/8 28/13 spot [1] 10/12 spots [2] 14/8 31/8 spreadsheet [4] 25/6 25/9 25/25 26/13 stabilized [1] 14/17 stabilizing [1] 16/3 staff [18] 16/6 17/8 18/13 18/21 18/22 19/16 19/24 22/14 23/6 26/13 42/4 43/10 43/11 43/23 45/3 48/25 49/3 49/7 stagnant [1] 42/23 standard [1] 11/20 start [2] 5/21 6/1 starting [1] 13/24 statement [3] 23/17 47/8 47/18 stay [7] 14/15 18/16 20/25 33/11 34/13 34/14 42/1 stayed [1] 9/13 staying [2] 16/14 23/21 stenographic [1] 50/2 still [4] 7/23 10/13 33/25 40/24 strategy [3] 9/6 46/14 46/16 stuff [5] 7/21 8/8 13/2 19/4 20/12 style [3] 41/22 42/4 42/11 subsidy [1] 32/11 substance [1] 23/22 substandard [2] 7/12 7/19 such [1] 50/22 suitable [1] 7/25 SUPERIOR [1] 1/3 support [14] 13/23 14/9 15/13 15/20 16/2 19/8 22/7 22/10 22/12 29/3 34/23 48/4 48/12 49/8 supporting [3] 22/4 22/16 30/17 supportive [4] 15/2 15/9 15/18 48/10 supports [13] 5/23 12/15 14/12 14/18 14/20 15/16 15/18 15/22 15/23 16/8 31/2 32/11 47/25 sure [1] 19/1 surf [1] 9/12 surfing [1] 7/9 SUTHERLAND [1] 2/5 sworn [1] 5/4 system [26] 12/14 15/6 15/22 23/8 23/10 23/14 24/10 25/4 32/4 32/6 37/12 38/7 38/9 38/10 40/6 40/14 41/11 43/3 44/14 47/9 47/22 48/9 48/10 48/11 48/17 49/1	T table [3] 13/18 13/22 38/18 take [4] 6/10 12/5 19/24 35/1 taken [2] 1/20 50/3 takes [1] 45/9 taking [1] 43/15 talk [3] 32/16 39/21 39/23 talked [1] 12/24 talking [4] 10/24 32/10 33/1 43/17 TAYLOR [1] 1/8 temporarily [1] 9/12 temporary [4] 32/19 32/22 34/10 37/12 tenure [4] 9/14 9/18 9/25 10/1 term [5] 9/18 8/18 19/9 33/7 33/8 terms [8] 6/5 7/13 7/20 19/25 21/15 29/7 43/4 47/22 testified [1] 5/5 testify [1] 5/4 than [9] 8/5 27/14 27/19 30/3 30/4 30/5 39/7 43/21 48/1 thank [26] 5/8 6/10 9/8 9/23 10/5 10/18 13/12 16/12 17/16 20/4 23/19 24/25 32/14 33/8 33/19 37/24 38/13 39/13 39/15 39/17 46/12 46/20 47/2 47/4 49/9 49/13 Thanks [1] 10/23 that [288] 5/22 6/2 6/4 6/5 6/7 6/8 6/8 6/11 6/18 6/21 6/25 7/2 7/3 7/4 7/14 7/15 7/16 7/18 7/21 7/24 8/6 8/8 8/20 8/22 8/23 8/24 8/25 9/2 9/3 9/6 9/7 9/7 9/9 9/11 9/11 9/17 9/20 10/2 10/3 10/4 10/4 10/14 11/8 11/12 11/19 12/3 12/4 12/5 12/5 12/12 12/21 13/2 13/16 13/18 13/22 13/25 14/7 14/8 14/9 14/15 14/16 14/20 15/2 15/3 15/3 15/4 15/5 15/5 15/7 15/8 15/9 15/13 15/20 15/24 16/8 16/18 16/19 16/25 17/3 17/3 17/4 17/6 17/8 17/10 17/11 17/11 17/12 17/14 17/14 17/14 17/15 17/18 17/20 17/22 17/23 17/25 18/1 18/5 18/6 18/11 18/13 18/19 18/19 18/25 19/1 19/2 19/2 19/4 19/5 19/5 19/6 19/6 19/7 19/10 19/13 19/14 19/14 19/17 19/21 19/24 19/24 20/1 20/12 20/13 21/2 21/13 21/15 21/16 21/18 21/20 21/23 21/24 22/2 22/5 22/6 22/8 22/12 22/14 22/17 22/17 22/20 22/21 23/1 23/3 23/11 23/16 23/17 23/20 24/5 24/6 24/9 24/12 24/21 25/2 25/7 25/10 25/19 26/3 26/7 26/7 26/9 26/14 27/1 27/3 27/5 27/8 27/10 27/10 27/11 27/20 27/25 28/3 28/20 29/8 29/14 29/19 30/2 30/3 30/3 30/5 30/9 30/15 30/24 31/1 31/4 31/8 31/21 31/21 32/1 32/3 32/8 33/1 33/10 33/12 33/20 33/20 33/25 34/1 34/2 34/11 34/18 34/21 34/24 35/6 35/10 35/11 36/4 36/7 36/9 36/15 36/17 36/19 36/20 37/8 37/13 37/18 38/3 38/9 38/10 38/10 39/2 39/6 40/2 40/3 40/4 40/4 40/6 40/7 40/8 40/14 40/15 40/19 40/19 41/1 41/3 41/7 41/10 41/12 41/15 41/16 41/16 41/23 42/1 42/1 42/7 42/20 42/21 42/24 42/25 43/18 43/24 44/2 44/3 44/4 44/4 44/9 44/15 44/18 45/6 45/12 45/13 45/15 45/16 45/16 45/20 45/22 45/23 45/24 46/6 46/8 46/16 47/8 47/10 47/11 47/17	that's [35] 5/25 6/9 8/19 8/20 8/20 10/15 10/21 14/2 14/4 14/14 15/7 15/12 16/7 16/9 22/20 25/23 25/25 27/24 28/4 31/23 34/22 35/19 36/5 36/6 36/7 36/7 36/24 37/2 39/8 40/10 42/13 45/19 45/21 47/15 48/13 their [25] 5/5 6/20 8/1 8/4 8/5 8/10 8/10 8/13 11/21 11/25 14/16 16/3 18/14 19/15 22/11 22/23 23/21 24/3 32/6 34/8 34/15 35/12 36/22 48/4 49/4 them [16] 7/25 8/7 10/3 11/7 12/20 13/1 13/2 13/10 19/8 19/21 21/21 24/11 24/13 34/25 42/1 44/3 then [22] 7/5 7/11 9/13 12/1 13/23 19/4 20/13 21/24 27/2 27/11 27/25 28/6 28/18 32/10 33/9 33/19 39/21 40/15 43/14 44/16 45/9 46/6 there [67] 6/14 11/16 11/23 12/4 13/18 13/19 14/7 14/13 16/1 16/1 16/2 16/16 16/19 17/3 17/5 18/14 18/14 18/17 18/20 19/4 21/2 21/4 21/5 21/13 21/17 24/5 25/16 26/14 26/25 27/1 27/3 27/4 27/22 28/18 32/8 32/22 33/2 33/2 34/1 34/17 34/23 35/11 35/14 36/16 37/20 37/22 40/6 40/7 40/19 40/20 41/1 41/12 41/23 42/9 43/21 43/23 44/9 44/10 44/18 44/19 45/2 45/2 45/9 45/10 45/10 46/23 46/25 there's [13] 11/20 11/20 13/22 16/2 18/18 23/7 23/9 32/23 33/16 40/4 40/18 41/21 42/24 thereafter [1] 12/2 these [12] 11/14 13/25 15/15 18/25 31/3 31/8 31/11 31/18 38/3 42/3 42/11 46/24 they [60] 6/19 8/9 8/12 10/2 11/16 12/1 12/2 12/10 14/9 14/15 17/13 18/5 18/6 19/24 21/10 21/22 21/23 22/4 22/9 22/16 22/17 22/17 22/22 22/23 22/25 27/6 29/11 30/2 30/3 31/4 31/13 32/5 32/5 32/6 32/20 33/4 33/6 33/6 33/10 33/14 34/9 35/4 35/9 35/12 36/23 38/11 41/21 43/13 43/14 43/16 43/17 43/25 43/25 44/3 44/24 45/18 48/8 48/9 48/11 48/16 they're [2] 11/18 27/7 they've [3] 11/6 11/25 27/9 thing [9] 14/24 21/20 23/1 24/2 24/5 29/7 33/2 35/21 43/18 things [13] 8/17 16/5 17/13 22/5 22/9 22/11 22/19 22/20 26/10 28/9 31/1 34/9 39/24 think [11] 15/14 16/17 19/19 21/9 24/3 26/9 29/11 29/17 35/18 36/2 36/6 third [6] 10/6 10/11 39/11 39/11 39/14 39/15 this [31] 1/21 4/2 9/19 10/10 13/3 18/5 18/22 18/24 22/22 23/7 24/8 25/15 26/5 26/6 26/23 28/6 28/7 30/20 34/18 34/21 35/24 35/24 37/9 38/17 39/9 43/8 45/4 50/14 50/16 50/19 50/20 those [35] 6/11 6/25 7/3 7/3 7/13 7/16 8/14 8/24 14/5 14/15 14/20 15/20 15/21 15/23 16/5 17/10 18/9 21/24 22/11 25/8 26/12 29/5 30/21 31/2 34/12 34/24 37/16 37/17 41/17 46/8 47/2 48/3 48/4 48/5 49/9
		A4548

<p>T</p> <p>though [1] 36/13 thought [2] 22/17 47/14 three [9] 11/19 35/16 35/19 35/21 36/10 36/11 36/20 37/4 41/24 three months [1] 11/19 through [11] 6/21 9/5 12/13 12/22 12/22 15/10 21/14 24/2 31/4 31/8 38/7 time [14] 18/6 18/23 18/24 19/2 20/17 23/21 24/18 24/20 27/1 34/16 43/25 44/20 45/10 46/9 timeframe [1] 25/14 times [8] 27/17 35/16 35/19 35/22 36/10 36/11 36/20 37/4 today [2] 5/8 48/18 together [1] 19/25 tone [1] 35/24 took [1] 33/21 tool [4] 10/7 10/25 11/1 25/25 tools [2] 25/7 26/13 toot [1] 49/6 top [3] 12/19 29/25 31/10 touch [1] 16/1 toward [1] 17/8 towards [1] 8/10 tracking [3] 25/6 25/25 26/13 trained [2] 22/22 22/24 training [1] 22/25 transcript [1] 50/16 transcription [1] 50/2 transitional [2] 32/21 33/10 tried [1] 34/25 true [2] 47/20 50/1 truth [1] 5/4 try [2] 39/8 49/8 trying [12] 13/5 17/17 19/19 25/17 30/20 34/11 35/1 36/18 39/7 43/24 44/12 44/17 tune [1] 35/5 turn [1] 6/2 turned [2] 18/9 19/14 turnover [3] 23/6 23/7 23/10 two [6] 5/10 13/21 15/21 20/24 26/10 42/9 two months [1] 20/24 type [2] 16/9 16/11 types [1] 16/5</p>	<p>31/21 38/24 39/2 48/12 updates [1] 43/2 upon [1] 1/20 use [3] 23/22 35/1 40/25 used [7] 8/22 9/19 20/8 20/11 24/22 40/2 48/2 using [3] 34/9 35/24 41/15 usually [2] 11/4 14/23 utilities [5] 8/15 8/17 28/9 28/10 28/10 utilize [3] 37/11 37/16 42/4 utilized [1] 41/8</p> <p>V</p> <p>vacate [1] 35/12 VAW [1] 38/1 Verbatim [1] 50/12 verge [3] 23/14 47/10 48/14 verify [1] 36/19 very [12] 8/6 13/9 13/10 20/8 23/7 38/21 42/23 47/2 48/21 48/24 49/2 49/13 VI [7] 10/7 10/25 11/2 12/9 12/18 12/25 13/15 VI-SPDAT [7] 10/7 10/25 11/2 12/9 12/18 12/25 13/15 via [1] 1/21 video [2] 39/9 39/18 videoconference [1] 1/21 violation [1] 50/16 violence [3] 7/4 38/1 38/5 virtually [2] 20/7 20/12 visits [1] 16/2 voice [1] 36/4 vulnerability [1] 10/25</p>	<p>11/2 11/11 13/6 15/1 16/7 17/25 18/15 18/24 19/10 19/12 19/19 25/14 25/24 26/11 28/5 29/5 29/13 29/22 29/23 30/7 30/10 30/21 32/10 34/1 36/2 38/22 40/23 41/11 42/9 43/1 43/7 44/3 45/21 48/24 What's [3] 7/13 8/2 20/21 whatever [6] 7/10 8/1 8/18 17/8 22/6 25/19 wheelchair [1] 23/25 when [11] 11/16 11/20 14/14 15/19 16/16 18/19 20/17 22/22 24/18 37/9 45/18 where [23] 7/21 12/8 13/22 17/7 18/8 18/12 19/22 27/6 32/20 33/11 37/25 38/18 39/23 40/10 40/21 40/24 41/1 42/11 43/21 43/25 44/9 45/17 48/13 whether [3] 13/8 15/15 17/17 which [3] 9/18 12/10 32/11 while [1] 39/4 who [12] 6/25 9/12 12/12 15/12 18/4 24/14 28/13 31/3 41/15 42/3 42/10 49/3 why [3] 6/13 21/12 35/23 will [9] 5/21 6/1 13/18 16/13 36/7 36/9 39/8 41/16 45/3 willingness [1] 19/6 winter [2] 46/14 46/19 wit [1] 5/5 within [25] 11/4 11/7 11/13 15/6 15/22 15/25 16/8 22/11 23/10 24/10 27/2 27/4 27/11 27/14 27/17 27/20 28/17 32/7 32/12 34/8 35/10 37/14 37/15 40/5 41/20 without [6] 9/13 9/17 9/24 24/1 50/18 50/21 witness [3] 3/3 5/3 26/7 WLG [1] 2/10 women [3] 7/4 38/1 38/6 wondering [2] 15/15 40/23 word [2] 35/2 40/2 work [5] 6/16 6/21 19/25 21/10 38/9 worked [2] 34/4 34/6 working [5] 21/8 24/10 44/11 45/21 49/4 Works [5] 28/13 28/16 29/2 30/4 30/6 world [1] 20/14 would [68] 6/10 7/3 7/6 7/15 7/16 8/5 8/14 8/16 8/16 8/19 8/25 9/7 9/14 9/20 10/1 12/5 14/6 15/1 15/4 15/12 16/7 17/2 17/13 18/12 18/14 18/14 18/17 18/21 19/4 20/1 21/25 22/4 22/15 22/17 23/2 23/20 24/4 24/15 27/8 27/9 27/16 27/19 29/8 29/14 30/24 31/1 31/19 31/20 37/13 38/3 38/11 39/3 40/5 40/10 40/13 42/12 42/19 43/13 44/4 44/8 47/21 47/21 48/13 48/19 48/20 48/21 48/23 49/2 wouldn't [19] 7/14 7/22 8/18 8/24 13/5 13/7 19/6 19/13 24/1 31/9 41/19 41/20 41/24 44/8 44/21 45/19 45/20 45/22 45/22 wrong [2] 28/18 29/12</p>
<p>U</p> <p>unaffordable [4] 7/12 8/2 8/3 8/9 under [6] 4/8 18/12 27/8 29/2 48/16 50/4 underfunding [1] 22/14 understand [5] 8/16 10/1 14/3 19/10 27/25 understanding [9] 7/13 7/15 32/19 33/10 33/12 33/18 33/25 38/5 41/12 Understood [1] 29/22 UNDERTAKINGS [2] 4/1 4/5 unfair [1] 26/17 unhoused [3] 7/6 7/15 12/1 unit [2] 41/3 41/23 units [2] 41/3 41/22 unless [2] 39/4 46/25 unoccupied [2] 40/3 40/3 unprecedented [2] 47/22 48/15 unsafe [2] 7/12 7/20 unsheltered [2] 7/1 7/6 until [2] 45/4 45/14 up [9] 7/19 20/15 29/8 29/14 29/19</p>	<p>W</p> <p>waitlist [1] 31/13 waitlists [2] 31/12 31/15 walk [1] 45/10 want [17] 6/21 7/22 9/9 13/13 13/21 14/11 19/1 28/7 32/2 32/8 34/20 38/20 39/5 39/5 45/12 46/8 46/23 WARD [1] 1/11 was [25] 6/7 9/12 13/6 15/15 20/8 20/17 20/20 23/3 24/18 25/19 34/17 34/21 34/21 34/23 35/14 35/22 36/10 36/11 36/16 36/18 36/19 46/16 47/10 47/11 47/12 water [1] 28/11 way [3] 17/8 18/19 24/22 ways [1] 22/24 we [51] 5/9 5/18 6/1 6/16 8/25 9/6 10/8 10/13 11/12 13/15 15/1 16/7 16/13 16/14 19/1 19/24 20/13 21/14 21/15 21/16 22/12 25/11 25/21 27/5 27/9 28/6 30/12 31/23 32/25 34/4 34/6 34/24 35/1 35/2 35/24 37/2 37/11 37/11 37/16 37/21 38/14 40/5 40/10 41/19 41/20 41/24 43/6 45/6 45/12 45/13 45/21 We'll [1] 36/8 we're [1] 21/20 We've [2] 26/2 26/15 week [2] 20/9 20/21 well [10] 9/5 9/7 25/13 25/17 35/14 36/18 48/21 48/24 49/2 49/7 were [17] 8/25 18/24 20/17 22/7 22/17 34/1 34/2 34/9 34/11 34/18 34/24 35/1 35/2 35/4 35/9 35/11 47/7 what [40] 6/19 7/1 8/2 8/3 8/19 9/24</p>	<p>Y</p> <p>Yeah [6] 10/16 40/10 44/24 45/3 46/2 47/21 year [1] 33/11 years [6] 24/9 24/11 24/23 24/24 38/4 38/12</p>

Y
yes [23] 5/16 9/7 9/21 9/22 13/11 14/23
23/18 23/23 24/24 28/15 29/16 31/13
32/5 33/18 35/20 37/20 38/5 38/11
38/25 43/5 43/23 46/19 47/15
yet [1] 36/17
YMCA [10] 32/16 32/18 32/19 33/21
34/4 34/7 35/7 35/8 35/10 36/13
you [179] 5/8 5/10 5/11 5/15 5/17 5/22
6/2 6/4 6/10 6/10 6/13 6/18 6/22 6/22
7/18 8/4 8/6 8/9 8/23 8/23 9/8 9/16
9/23 9/23 10/5 10/7 10/8 10/12 10/19
10/24 12/2 12/17 12/20 12/24 13/3
13/6 13/6 13/8 13/12 13/18 14/3 14/8
14/20 15/9 15/14 15/19 16/12 16/16
17/6 17/16 17/16 17/18 17/18 18/3
18/4 18/8 18/18 18/24 18/25 19/1 19/5
19/7 19/8 19/10 19/13 19/13 19/15
19/17 19/23 19/25 20/4 20/5 20/8
20/15 20/17 20/20 20/21 20/25 21/4
21/5 21/9 21/17 21/22 22/9 22/13
22/21 23/1 23/11 23/17 23/19 23/20
24/7 24/14 24/16 24/18 24/25 25/2
25/2 25/7 25/15 26/21 26/23 28/11
29/1 29/7 29/9 29/15 29/23 30/15
30/19 30/19 30/20 31/7 31/11 31/14
31/17 31/22 32/14 32/15 33/8 33/19
33/19 33/20 34/25 35/24 37/7 37/9
37/21 37/24 37/25 38/3 38/13 38/18
38/22 39/3 39/4 39/5 39/13 39/15
39/17 39/18 39/21 39/22 39/23 40/4
41/2 41/9 43/2 43/7 43/9 43/14 43/20
44/6 44/16 44/17 45/1 45/1 45/4 45/7
45/8 45/17 46/6 46/12 46/13 46/20
46/20 46/23 47/1 47/2 47/4 47/7 47/14
47/19 48/8 48/13 49/6 49/9 49/10
49/13
you're [4] 5/9 25/15 35/17 43/1
you've [5] 6/25 35/15 36/25 42/7 46/3
your [26] 5/10 5/11 5/14 5/21 6/6 7/13
8/3 9/1 10/7 10/11 10/15 10/17 13/13
16/13 16/25 20/21 25/1 27/25 30/13
32/18 33/12 33/25 34/22 38/18 38/22
45/25
yourself [1] 5/15
YWCA [4] 32/16 33/9 34/7 35/7

A8834

A4550

A8835

Court File No. CV-21-00077187-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

KRISTEN HEEGSMA, DARRIN MARCHAND, GORD SMYTH, MARIO
MUSCATO, SHAWN ARNOLD, BRADLEY CALDWELL, CHRISTINE
DELOREY, GLEN GNATUK, TAYLOR GOGO-HORNER, CASSANDRA
JORDAN, JULIA LAUZON, AMMY LEWIS, ASHLEY MACDONALD,
COREY MONAHAN, MISTY MARSHALL, SHERRI OGDEN, JAHMAL
PIERRE, LINSLEY GREAVES and PATRICK WARD

Applicants

and

CITY OF HAMILTON

Respondent

APPLICATION UNDER 14.05 OF THE *RULES OF CIVIL PROCEDURE*

AFFIDAVIT OF FRANK MISCIONE

I, Frank Miscione, of the City of Hamilton, in the Province of Ontario, AFFIRM:

1. I am the Inspector of the Community Mobilization Division of the Hamilton Police Service. In my role as Inspector, I oversee the Crisis Response Branch ("CRB"). As such I have knowledge of the matters set out in this my affidavit. Where I rely on the information of others, I state the source of that information and verily believe it to be true.
2. I make this Affidavit as a supplement and update to my affidavit affirmed October 7, 2021.

A4551

3. In order to provide an update as to calls for service regarding encampments and the Hamilton Police Service (“HPS”)’s role in encampment engagement, I have prepared a report entitled “Encampments Calls For Service and Encampment Engagement Team Overview,” (the “Update Report”) which is attached to my affidavit as **Exhibit “A”**. The Update Report is true and accurate to the best of my knowledge.

Encampment Engagement Team

4. As detailed at page 3 of the Update Report, in approximately April of 2023, the City approved funding to support the creation of an Encampment Engagement Team within HPS, composed of two full-time HPS Officers.
5. The Encampment Engagement Team’s role and a summary of their enforcement activities is summarized at pages 3 and 4 of the Update report.

Updated Statistics

6. The HPS Crime Information Analysis Unit have collected and organized updated Computer Aided Dispatch (CAD) event statistics from July 1, 2023 to June 30, 2024. These updated data re discussed at pages 4 through 9 of the Update Report, using two different methodologies:
 - (a) Methodology “A” analyzes CAD events from the five parks with the highest total visits from Encampment Engagement Team;

- (b) Methodology “B” analyzes CAD events from where the call taker had recorded ‘tent’ or ‘encampment’.

As explained in the Update Report, CAD event activity statistics only captures activity within a geographical boundary of a park for HPS uniform patrol responding to calls. It does not include the activity for the proactive work that the HPS social navigator program or encampment engagement team provides.

7. Exhibit “B” to my affidavit is Appendix A to the Update Report, namely a chart detailing the CAD event codes and their respective classifications, as referenced in the Update Report.

AFFIRMED by Frank Miscione at the City of Hamilton, in the Province of Ontario, before me on July 24, 2024, in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:

Bevin Shores

75E43E7F402846F...

Commissioner for Taking Affidavits
(or as may be)

BEVIN SHORES

DocuSigned by:

Frank Miscione

2D2D370773134B0...

FRANK MISCIONE

A8838

This is Exhibit "A" to the Affidavit of Frank Miscione
AFFIRMED remotely at the City of Hamilton, in the Province of Ontario
before me at the City of Hamilton, in the Province of Ontario,
on this 24th day of July, 2024, in accordance with
O. Reg. 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:

Bevin Shores

75E42E7F402846F...

Bevin Shores (56161F)

*Commissioner for Taking Affidavits
(or as may be)*

A4554

A8839



Hamilton Police Service

Encampments Calls For Service and Encampment Engagement Team Overview

Inspector Frank Miscione,
Crime Information Analysis Unit

2024/07/22

A4555

Summary

Encampment related calls for service continue to be complex events for first responders. Law enforcement agencies respond to many calls for services at locations where there are encampments. In September 2021, Hamilton Police Service was requested to review activity in the past year related to encampments. Analyzing the data for encampments is challenging, as the data capture processes for both encampments and encampment related activity is not well defined. In 2024, additional data was requested.

Background

The Hamilton Police Service (HPS) Crisis Response Branch (CRB) in partnership with a number of community agencies, developed multiple responses to support vulnerable and marginalized individuals and those experiencing mental health issues.

In April 2015, Hamilton Police created the Crisis Response Branch (CRB) by combining the following three programs:

- Crisis Outreach and Support Team (COAST). Police officers in plain clothes and St Joseph's Hospital mental health workers.
- Mobile Crisis Rapid Response Team (MCRRT). Police officers in uniform and St. Joseph's Hospital mental health workers.
- Social Navigator Program (SNP). Police officers in uniform and Emergency Medical Services (EMS) paramedics.

In 2022, the CRB expanded to include:

- Rapid Intervention Support Team (RIST). Police officers in uniform and eight members from seven different community outreach organizations.
- Encampment Engagement Team (EET). This pilot program provides support for Municipal Law Enforcement Officers (MLEO) with dedicated police officers.

These programs have decreased the number of persons being brought to hospital emergency departments and increased the number of individuals being connected with social service agencies. The initiatives have reduced apprehension rates, improved care for clients, and lessened the impact on the judicial and health care system.

CONFIDENTIAL

THIS RECORD, AND THE INFORMATION CONTAINED THEREIN, IS PROVIDED IN CONFIDENCE AND REMAINS THE PROPERTY OF THE HAMILTON POLICE SERVICE (HPS). IT IS NOT TO BE DISCLOSED TO ANY PERSON OR AGENCY WITHOUT THE PRIOR WRITTEN PERMISSION OF THE HPS RECORDS SUPERVISOR OR FOI COORDINATOR

A8841

Encampment Engagement Team (EET)

In April of 2023, two Constables were assigned full time to the Encampment Engagement Team (EET) and funded by the City of Hamilton as part of the Coordinated Encampment Response Team (CERT).

Between April 2023 and August 2023 The Encampment Engagement Team was responsible for:

- Encampment identification
- Encampment assessment and prioritization
- Outreach and support services
- Partnering with Municipal Law Enforcement to coordinate encampment clean up
- Responding to calls for service at encampments
- Verifying location of encampment and de-confliction
- Supporting Municipal Law Enforcement in By-Law enforcement of the Road allowance By-Law
- Sharing information with City of Hamilton partners
- Proactive patrol of former encampment sites

In August of 2023, Hamilton City Council voted to adopt and implement an official City of Hamilton Encampment Protocol.

Prior to September 2023, the Encampment Engagement Team supported Municipal Law Enforcement (MLE) in their enforcement of the road allowance and By-law 01-129 in any park where a deemed safety risk was present. When the Encampment Protocol was initiated in August 2023 it was designed as a housing first approach and therefore the Encampment Engagement Team took on a different role. They would be called to an encampment after attempts were made by the Housing Focused Street Outreach (HFSO) team and MLE to gain compliance had failed. EET would accompany MLE for the issuance of Notice of Non-Compliance and then re-attended to check on that compliance. If compliance had not been met a Notice of Trespass was issued by MLE. EET would then be given the file for the purposes of enforcing the Trespass to Property Act.

For private property, the Encampment Engagement Team would receive an authorization letter from the land owner requesting that police remove the encampment on their property.

From April 13th 2023 to December 21st 2023, the Encampment Engagement Team completed 464 site visits. Of the 464 sites visited, 266 were City Parks, 154 were other City lands such as road allowance, and 44 were private property.

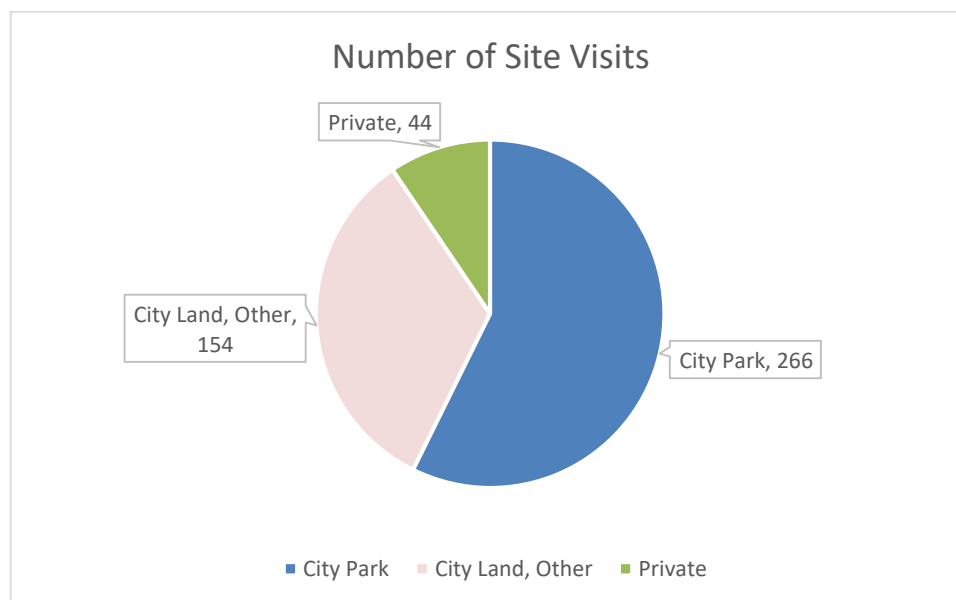
CONFIDENTIAL

THIS RECORD, AND THE INFORMATION CONTAINED THEREIN, IS PROVIDED IN CONFIDENCE AND REMAINS THE PROPERTY OF THE HAMILTON POLICE SERVICE (HPS). IT IS NOT TO BE DISCLOSED TO ANY PERSON OR AGENCY WITHOUT THE PRIOR WRITTEN PERMISSION OF THE HPS RECORDS SUPERVISOR OR FOI COORDINATOR

A4557

A8842

Figure 7 EET Site Visit Types 2023



From September 1st 2023 to December 31st 2023 the Encampment Engagement Team assisted MLE in issuing 278 notices (Non-compliance or Trespass) at locations that were not in compliance with the City of Hamilton Encampment Protocol.

The team worked alongside MLE and Parks staff who did the clean ups of abandoned sites and clean around of existing sites. Their role was to keep staff safe, keep the peace, and to mitigate any situation that would arise.

From September 1st 2023 to December 31st 2023 Encampment Engagement Team spent 127 hours enforcing those notices.

From January 1st 2024 to June 30st 2024 Encampment Engagement Team visited 509 sites, assisted Municipal Law Enforcement with the issuance 383 notices (Notice of Non-compliance or Trespass) and Spent 200 hours enforcing those notices.

Enforcement is defined as gaining compliance to the protocol. No use of force was used on any person during these enforcement hours and no person was arrested or charged for refusing to leave an encampment.

For the purpose of this analysis, the Crime Information Analysis Unit has prepared methodology to extract these events from our record management system and computer aided dispatch system (CAD). In 2021, the analysis focused on the largest six known park sites with encampments. In 2024, the approach is the same, but the areas of interest have shifted to a focus of five new parks with highest total visits from Encampment Engagement Team. The areas are different due to the transient nature of encampments. It is important to note that the CAD event activity statistics only captures activity within a geographical

CONFIDENTIAL

THIS RECORD, AND THE INFORMATION CONTAINED THEREIN, IS PROVIDED IN CONFIDENCE AND REMAINS THE PROPERTY OF THE HAMILTON POLICE SERVICE (HPS). IT IS NOT TO BE DISCLOSED TO ANY PERSON OR AGENCY WITHOUT THE PRIOR WRITTEN PERMISSION OF THE HPS RECORDS SUPERVISOR OR FOI COORDINATOR

A4558

A8843

boundary of a park for our uniform patrol responding to calls. It does not include the activity for the proactive work that our social navigator program or encampment engagement team provides. It is stretch to discern without hand reviewing records whether the event is encampment related. The second methodology extracts from the CAD system events where the call taker had recorded 'tent' or 'encampment'.

Key findings of the analysis include the following:

Methodology A:

- There were 395 CAD events from July 1 2023 to June 30 2024 for the selected 'encampment' locations
- The top five types of CAD events grouped by type with the highest volumes were the following (sorted volume descending): mischiefs, other (911 advised, ambulance assist, fire, person down, protest, warrants), medical, property (theft, break and enter) and person in crisis. Suspicious Person and Trespassing make up the most events that fall within the mischief group.
- Activity for these sites steadily increases from spring months to summer months
- City Hall and Gage Park have the highest event volumes in the past year

Methodology B:

- There were 2,659 CAD events where 'encampment' or 'tent' is recorded in the notes section from July 1 2023 to June 30 2024
- The top five types of CAD events with the highest volume where 'encampment' or 'tent' is mentioned is the following (sorted volume descending): mischief, other, medical, property, and person in crisis
- Activity is clustered in the downtown core

CONFIDENTIAL

THIS RECORD, AND THE INFORMATION CONTAINED THEREIN, IS PROVIDED IN CONFIDENCE AND REMAINS THE PROPERTY OF THE HAMILTON POLICE SERVICE (HPS). IT IS NOT TO BE DISCLOSED TO ANY PERSON OR AGENCY WITHOUT THE PRIOR WRITTEN PERMISSION OF THE HPS RECORDS SUPERVISOR OR FOI COORDINATOR

A4559

(Methodology A) Encampment Select Locations – Totals and Type

The data below summarizes 395 CAD Events at the identified park locations.

Map 1a. Selected Park Locations



Chart 1a. Park Events by Month

Encampment Location	2023						2024						Total
	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	
Bayfront Park	2	2	4	5	2	3	3	2	3	5	17	23	71
City Hall	12	20	8	12	6	3		3	22	4		19	109
Gage Park	3	5	3	9	3	2	9	1	6	12	9	24	86
JC Beemer / Tweedsmuir	11	12	10	6	1	5	6	2	4	5	1	14	77
Wellington Park	4	2	2	7	5	4	2	6	1	8	5	6	52
Total	32	41	27	39	17	17	20	14	36	34	32	86	395

CONFIDENTIAL

THIS RECORD, AND THE INFORMATION CONTAINED THEREIN, IS PROVIDED IN CONFIDENCE AND REMAINS THE PROPERTY OF THE HAMILTON POLICE SERVICE (HPS). IT IS NOT TO BE DISCLOSED TO ANY PERSON OR AGENCY WITHOUT THE PRIOR WRITTEN PERMISSION OF THE HPS RECORDS SUPERVISOR OR FOI COORDINATOR

A8845

Chart 1b. Event Categories by Month

Top 5 Encampments	2023						2024						
Total	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Total
DOMESTIC	2		1	1						1	1	2	8
DRUG / ALCOHOL		3	1	2					1	1		2	10
MEDICAL	6	8	7	5	3	6	4	4	8	5	2	12	70
MISCHIEF	7	17	10	15	5	3	7	4	11	13	11	30	133
OTHER	6	7	4	8	5	3	8	4	10	7	8	17	87
PIC	4	1	2	1	1			1	2	2	3	3	20
PROPERTY	1	1		2	1	1			1	1	5	2	15
SEXUAL												3	3
VIOLENT	6	4	2	5	2	4	1	1	3	4	2	15	49
Total	32	41	27	39	17	17	20	14	36	34	32	86	395

(Methodology B) Encampment/Tent Locations – Dispatch Keywords

The data below summarizes 2,659 CAD Events using keywords “encampment” and “tent”

Map 2a. Dispatch Note Locations Hot Spot Map

CONFIDENTIAL

THIS RECORD, AND THE INFORMATION CONTAINED THEREIN, IS PROVIDED IN CONFIDENCE AND REMAINS THE PROPERTY OF THE HAMILTON POLICE SERVICE (HPS). IT IS NOT TO BE DISCLOSED TO ANY PERSON OR AGENCY WITHOUT THE PRIOR WRITTEN PERMISSION OF THE HPS RECORDS SUPERVISOR OR FOI COORDINATOR

A4561

A8846

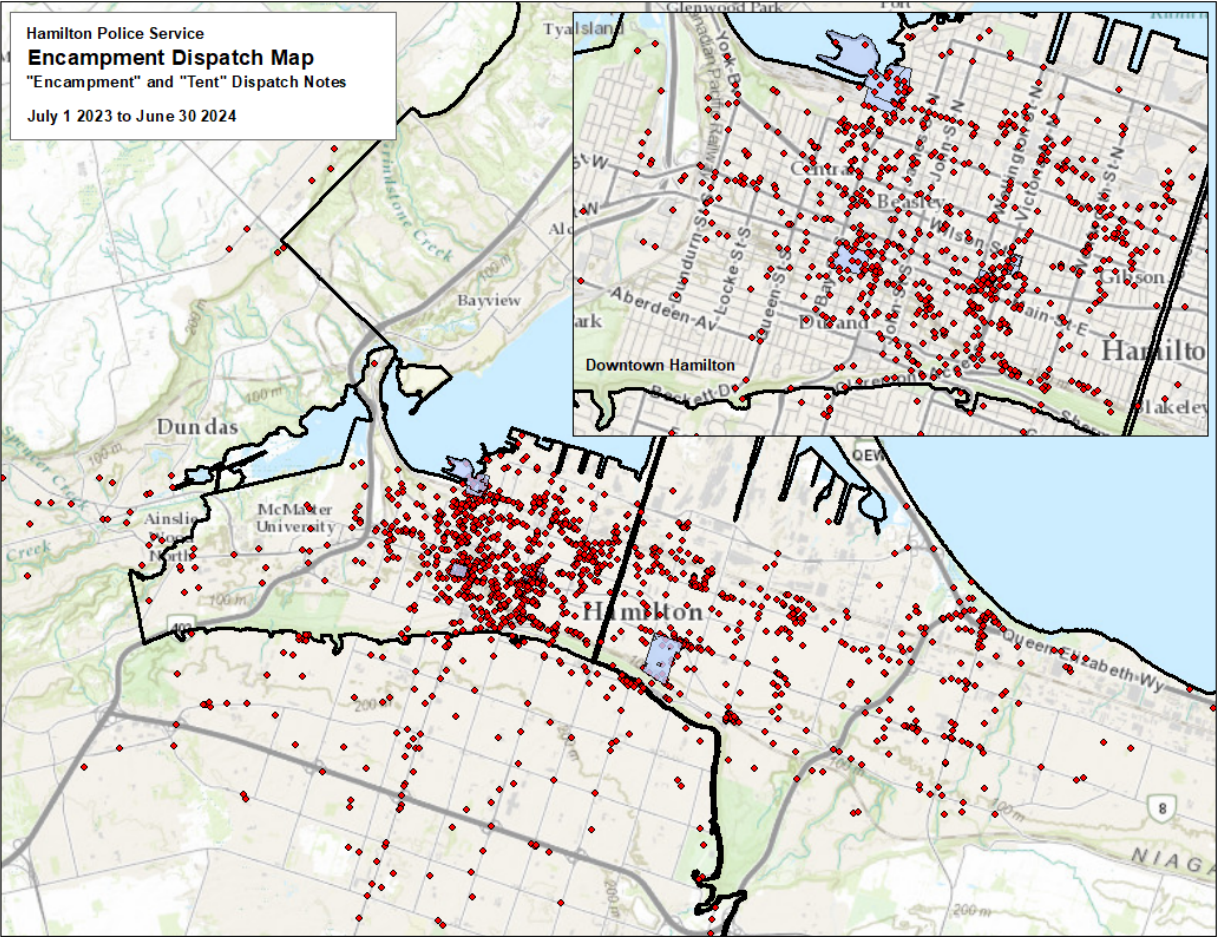


Chart 3a. Event Categories by Month

Keywords	2023						2024						
Total	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Total
DOMESTIC	11	7	7	8	6	8	2	5	6	9	12	18	99
DRUG / ALCOHOL	8	8	5	3		1		2	1	3	3	9	43
MEDICAL	17	18	23	17	18	16	11	9	14	20	14	46	223
MISCHIEF	126	117	99	108	74	56	54	43	61	76	104	205	1123
OTHER	51	46	55	34	49	55	35	46	52	45	46	105	619
PIC	18	17	12	10	8	14	6	7	15	10	7	14	138
PROPERTY	18	18	12	14	10	10	10	4	4	9	15	25	149
SEXUAL	1	3		1	1			1				4	11
VIOLENT	26	23	40	22	13	10	6	6	15	16	25	52	254
Total	276	257	253	217	179	170	124	123	168	188	226	478	2659

Chart 3c. Top Locations (Where Available)

CONFIDENTIAL

THIS RECORD, AND THE INFROMATION CONTAINED THEREIN, IS PROVIDED IN CONFIDENCE AND REMAINS THE PROPERTY OF THE HAMILTON POLICE SERVICE (HPS). IT IS NOT TO BE DISCLOSED TO ANY PERSON OR AGENCY WITHOUT THE PRIOR WRITTEN PERMISSION OF THE HPS RECORDS SUPERVISOR OR FOI COORDINATOR

A4562

A8847

Location	Count
1000 MAIN ST E HAM: @GAGE PARK	54
68 VICTORIA AV N HAM: @J C BEEMER PARK	47
71 MAIN ST W HAM: @CITY HALL	46
1570 MAIN ST E HAM: @MONTGOMEREY PARK	31
501 BARTON ST E HAM: @WOODLANDS PARK	29
91 EAST AV S HAM: @BISHOPS PARK	27
75 MACNAB ST S HAM: @YWCA	27
130 YORK BV HAM: @SIR JOHN A MACDONALD PUBLIC SECONDARY SCHOOL	27
200 HARBOUR FRONT DR HAM: @BAYFRONT PARK	22
1501 BARTON ST E HAM: @FAIRFIELD PARK	22
32 STINSON ST HAM: @CARTER PARK	21
168 BAY ST N HAM: @CENTRAL PARK	18
516 KING ST W HAM: @VICTORIA PARK	17
935 CONCESSION ST HAM: @MOUNTAIN DRIVE PARK	14
160 WENTWORTH ST N HAM: @CATHY WEVER PUBLIC ELEMENTARY SCHOOL	13
399 KING ST E HAM: @WELLINGTON PARK	12
1124 MAIN ST E HAM: @DOLLARAMA	12
68 VICTORIA AV N HAM: @BEEMER JACK C PARK	11
1100 MAIN ST E HAM: @DELTA PARK	11
369 BAY ST N HAM: @BAYFRONT PARK	10

CONFIDENTIAL

THIS RECORD, AND THE INFORMATION CONTAINED THEREIN, IS PROVIDED IN CONFIDENCE AND REMAINS THE PROPERTY OF THE HAMILTON POLICE SERVICE (HPS). IT IS NOT TO BE DISCLOSED TO ANY PERSON OR AGENCY WITHOUT THE PRIOR WRITTEN PERMISSION OF THE HPS RECORDS SUPERVISOR OR FOI COORDINATOR

A4563

A8848

This is Exhibit "B" to the Affidavit of Frank Miscione
AFFIRMED remotely at the City of Hamilton, in the Province of Ontario
before me at the City of Hamilton, in the Province of Ontario,
on this 24th day of July, 2024, in accordance with
O. Reg. 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:

Bevin Shores

75E43E7E402846E

Bevin Shores (56161F)
Commissioner for Taking Affidavits
(or as may be)

A4564

A8849



Hamilton Police Service

Encampments Calls For Service and Encampment Engagement Team Overview Appendix A

Inspector Frank Miscione
Crime Information Analysis Unit

2024/07/22

A4565

A8850

Appendix - Computer Automated Dispatch Classifications

Classification	CAD Event Codes			
Domestic	CAB-J CAB-R CHILDCUST-R	DOM-F DOM-I DOM-J	DOM-R FAM-I FAM-J	FAM-R
Drug / Alcohol	CDSA DRIVECOM DRIVECOM-CMB	DRUG INTOXICATED LLA		
Medical	AMB-10-2000 AMB-A	AMB-ADV CHKOTHER		
Mischief	DISORD DIST-F DIST-P DIST-ST MISCH-CMB MISCH-F	MISCH-I MISCH-J MISCH-R NC NT-A	NT-D PROWL-I PROWL-J SS SUSP-CIR	SUSP-PER SUSP-VEH TRESS TRESS-CMB TRESS-F
Other	911-ADV ADVICE-CMB ANIMAL ASSIST-O CBP ENFRCMNT	FIRE-A FIRE-ADV FIRE-F FNDPERS MARINE MP	MP-F MP-RET OPP-ADV PERS-DWN PROACTIVE PROTEST	SPECDDUTY UK-911 UK-PROB UN-GUEST WARRANTS W-PERSON
PIC	MHAFRM PIC RES-COMP	SUICIDE SUICID-F		
Property	ABAN BE-CMB BE-F BE-I BE-J BE-R	FNDPROP FRAUD-CMB FRAUD-R LOOKOUT LOOKOUTN LOSTPROP-CMB	LT-A LT-D OS-C PROP-REM SA-F SA-R	SA-REC THEFT-CMB THEFT-F THEFT-I THEFT-J THEFT-R
Sexual	SEXOFF-F SEXOFF-J SEXOFF-R			
Violent	ASLT-F ASLT-I ASLT-J HARASS ROB-F ROB-J	ROB-R SHOOT-J SHOOT-P STAB-F STAB-J THREAT-F	THREAT-I THREAT-J THREAT-R WEAPON-F WEAPON-I WEAPON-R	

CONFIDENTIAL

THIS RECORD, AND THE INFORMATION CONTAINED THEREIN, IS PROVIDED IN CONFIDENCE AND REMAINS THE PROPERTY OF THE HAMILTON POLICE SERVICE (HPS). IT IS NOT TO BE DISCLOSED TO ANY PERSON OR AGENCY WITHOUT THE PRIOR WRITTEN PERMISSION OF THE HPS RECORDS SUPERVISOR OR FOI COORDINATOR

A4566

KRISTEN HEEGSMA et al.

Court File No. CV-21-00077187-0000

- and - CITY OF HAMILTON

Applicants

Respondent

ONTARIO SUPERIOR COURT OF JUSTICE PROCEEDING COMMENCED AT HAMILTON	
AFFIDAVIT OF FRANK MISCIONE AFFIRMED JULY 24, 2024	
GOWLING WLG (CANADA) LLP Barristers & Solicitors One Main Street West Hamilton, ON L8P 4Z5 Tel: 905-540-8208 Bevin Shores (LSO#56161F) Tel: 905-540-2468 <i>bevin.shores@gowlingwlg.com</i> Jordan Diacur (LSO#65860E) Tel: 905-540-2500 <i>jordan.diacur@gowlingwlg.com</i> Lawyers for the respondent File Number: H227899	

COURT FILE NO. CV-21-77187

ONTARIO

SUPERIOR COURT OF JUSTICE

BETWEEN:

KRISTEN HEEGSMAS, DARRIN MARCHAND, GORD SMYTH, MARIO MUSCATO, SHAWN ARNOLD, BRADLEY CALDWELL CHRISTINE DELOREY, GLEN GNATUK, TAYLOR GOGO-HORNER, CASSANDRA JORDAN, JULIA LAUZON, AMMY LEWIS, ASHLEY MACDONALD, COREY MONAHAN, MISTY MARSHALL, SHERRI OGDEN, JAHMAL PIERRE, LINSLEY GREAVES and PATRICK WARD

Applicants

-AND-

CITY OF HAMILTON

Respondent

The Cross-Examination of Inspector Frank Miscione, on an Affidavit dated July 24, 2024 taken upon affirmation in the above action this, 22nd of August, 2024, . conducted via videoconference hosted by the offices of Nimigan Mihailovich Reporting Inc.

A8852

APPEARANCES:

For the Applicants:

SUJIT CHOUDHRY

Haki Chambers Global

For the Hamilton Community Legal Clinic:

CURTIS SELL

For the City of Hamilton:

BEVIN SHORES

JOJO JOHNSON

Gowling WLG (Canada) LLP

INDEX

PAGE

WITNESS: INSPECTOR FRANK MISCIONE

Cross-Examination by MR. CHOUDHRY 4

EXHIBITS

(None marked).

GUIDE TO UNDERTAKINGS, ADVISEMENTS, and REFUSALS:

This should be regarded as a guide and does not necessarily constitute a complete list:

UNDERTAKINGS:

None noted.

UNDER ADVISEMENTS:

None noted.

REFUSALS:

None noted.

1 -- Commencing at 1:00 p.m. --

2 INSPECTOR FRANK MISCIONE: Affirmed.

3 CROSS-EXAMINATION BY MR. CHOUDHRY:

4 1 Q. Inspector Miscione, thank you for coming

5 this afternoon. For the record, my name is

6 Sujit Choudhry. I am one of the lawyers for the

7 Applicants in this matter. I'm just going to begin by

8 giving a bit of introduction to preface my

9 cross-examination of you today, sir.

10 A. All right.

11 2 Q. Some of this has already been covered by

12 Ms. Shores but I would like to get it on the record as

13 well.

14 So, as you know, I'm cross-examining you on

15 your affidavit that would have been filed by the City in a

16 court case regarding homeless encampments; and your

17 affidavit and this cross-examination will be put into

18 evidence before the Court, and so it is therefore

19 important, and I know you know this, that you need to tell

20 the truth.

21 A. Yes.

22 3 Q. In addition, if you would like me to repeat

23 a question, please do. If you'd like to take a moment to

24 collect your thoughts to answer a question, please do.

25 You are entirely free to refer to your

1 affidavit and exhibits in answering a question. You can
 2 consult them there. I'm also going to put them on the
 3 screen so if you want me to scroll up or down to a part of
 4 the affidavit, I will do so, and you can refresh your
 5 memory and take as long as you need to reread something.
 6 Okay?
 7 A. Thank you, yes.
 8 4 Q. And so if I do happen to want to put
 9 anything else up on the screen or ask you questions, I'll
 10 put it up on the screen and give you plenty of time to
 11 review things.
 12 Okay?
 13 A. Yes.
 14 5 Q. Okay. So, sir, do you have any questions
 15 about what I just said?
 16 A. I have no questions.
 17 6 Q. Okay. Thank you. So I'm going to now put
 18 up your affidavit on the screen, and I'm going to adjust
 19 things here a bit from my end, just if you could bear with
 20 me.
 21 Do you see the PDF on the screen?
 22 A. I do. It's the first page of the
 23 affidavit.
 24 7 Q. Yes. Is that big enough for you? Should I
 25 enlarge it?

A8853

1 A. It's good at the moment.
 2 8 Q. Let me just do the best I can. Here, how
 3 is that? Is that better?
 4 A. That's good, yes.
 5 9 Q. Okay. And if you can't read it or you need
 6 me to adjust it, do, because everybody's got different
 7 computers at their end.
 8 Okay?
 9 A. Yeah.
 10 10 Q. So this is your affidavit and I can take it
 11 as the date this is the one you swore most recently. I
 12 just have a couple of questions about it, if I could.
 13 A. Yes.
 14 11 Q. So I would like to take you down to
 15 paragraph 6, please. And I'm going to -- it's a paragraph
 16 that runs over two pages. So let me just begin by letting
 17 you read, reread paragraph 6 to refresh your memory. So
 18 you can start with the portion of paragraph 6 that's on
 19 this page.
 20 A. Okay.
 21 12 Q. Okay. Can I go down?
 22 A. You can go down.
 23 13 Q. Okay. And then you can read to the end of
 24 paragraph 6 here.
 25 A. [Reading].

1 Okay. You can proceed.
 2 14 Q. Okay. So I just want to ask a couple of
 3 questions about this. And so the -- your affidavit states
 4 that:
 5 "The HPS
 6 Crime Information Analysis Unit
 7 collected and organized this
 8 data[...]"
 9 Correct?
 10 A. That's correct. Yes.
 11 15 Q. So you didn't collect and organize it
 12 yourself?
 13 A. The CAD event data is what they collected
 14 and organized. The Encampment Engagement Team statistics
 15 in the second part of it is something that my team outside
 16 of CIAU would do.
 17 16 Q. So outside of CIAU? Sorry?
 18 A. Sorry.
 19 17 Q. Can you just spell that out for us?
 20 A. Yes, sorry about that. Crime Information
 21 Analysis Unit. We referred to this as the acronym "CIAU".
 22 So that's the word, "Crime Information Analysis Unit" if I
 23 say CIAU that is what I am referring to it.
 24 So the CIAU collects the CAD data
 25 information and the Crisis Response Branch collects the

1 Encampment Engagement Information.
 2 18 Q. Okay. And just to understand the CIAU
 3 is -- I'm highlighting here in paragraph 6. That's what
 4 you have referred to; correct?
 5 A. That's correct, yes.
 6 19 Q. And when you say that:
 7 "Your unit collects the encampment
 8 engagement[...]"
 9 How is that distinct from the CAD data that
 10 is the basis for your affidavit?
 11 A. The CAD data or computer-aided dispatch is
 12 a call for service that comes in to our memo and
 13 dispatchers and is given to our uniform patrol officers.
 14 That is the CAD data.
 15 The encampment engagement information comes
 16 from their engagement within the community. They are
 17 working with the coordinated response team for the City of
 18 Hamilton and that is captured in their logs that comes to
 19 our unit each day.
 20 There generally is not CAD information
 21 necessarily on the encampment engagement as
 22 there is with a 9-1-1 call to 9-1-1 dispatchers which is
 23 captured in the CAD events.
 24 20 Q. Okay. And just so I'm understanding
 25 because I'm trying to understand you talked about two

A4569

A8854

1 pieces of data.

2 Does this document try to put those pieces

3 of data together?

4 A. They do not. They give separate reports on

5 those data.

6 21 Q. Okay. That helps.

7 So I just want to take you now to Exhibit A

8 which I have pulled up here and this is the -- do you

9 recognize this document?

10 A. I do, yes.

11 22 Q. Okay. So I'm going to go scroll down to

12 page 6 and we can look at any other page you would like

13 to. But I will have a couple of questions about page 6.

14 A. Okay.

15 23 Q. So here I kind of put on the screen the

16 descriptions of methodology A and your descriptions of

17 methodology A and methodology B.

18 Do you recognize those?

19 A. I do, yes.

20 24 Q. I just have a couple of questions about

21 each of these.

22 A. Sure.

23 25 Q. So for methodology A, you say here that:

24 "There were 395 CAD events from

25 July 1, 2023, to July 30, 2024 for the

1 selected encampment locations".

2 Just to clarify, are those the five parks?

3 A. That's correct.

4 26 Q. What are those five parks again for the

5 record?

6 A. It is reported in the affidavit.

7 27 Q. Sure. I can scroll for it if you like or

8 you can look there.

9 A. Give me one second. I can take a look

10 because I have it here.

11 28 Q. Sure. And if you could help me I can look

12 at where you are referring to in your affidavit as well.

13 A. Sure, one second. So if you look at the

14 last page of the affidavit at Appendix A.

15 29 Q. Okay. I'm just scrolling down.

16 A. Yes.

17 30 Q. I'm just going to reduce it in size a bit.

18 A. Yes. So that page there --

19 31 Q. Yes.

20 A. -- would outline the top five parks where

21 we are seeing activity counted from the CAD data.

22 32 Q. Okay.

23 A. Those are the count for the calls per

24 service which is the basis between how we delineate what

25 the top five parks are.

1 33 Q. Okay. And so I'm looking at this list

2 here. There seem to be more than five lines on this list.

3 A. Yes, correct.

4 34 Q. So are these from the five parks that you

5 referred to or are these the five parks?

6 A. There are several parks here. What we've

7 done here is we have outlined the CAD data from the top

8 five.

9 35 Q. Can you identify for me the top five?

10 A. Gage Park.

11 36 Q. Okay.

12 A. J.C. Beemer Park.

13 37 Q. Right.

14 A. City Hall.

15 38 Q. Right.

16 A. And --

17 39 Q. Okay. That's four. And Woodlands?

18 A. And Woodlands Park.

19 40 Q. So it's just these five here that helps me.

20 Thanks.

21 A. So the CAD data I mentioned in

22 methodology A would come from the calls for service at

23 those parks.

24 41 Q. Okay. Great, thanks. I'm going to go back

25 to that page I had you on before if I could because I

1 would like to just ask you a question about this; right?

2 A. One second, if you don't mind. I'm just

3 referring back to some data here. Okay, go ahead.

4 42 Q. Okay. Are we good?

5 A. Yes. We are good.

6 43 Q. Okay. All right. So just a question.

7 From Methodology A only, it had events that you described

8 in your affidavit are only for those five parks; right?

9 They are not for other encampment locations and they

10 aren't for the rest of the city?

11 A. That is correct.

12 44 Q. Okay.

13 A. It's not based on the park itself. It's

14 based on what the City of Hamilton determines the park

15 boundaries are of that park.

16 45 Q. Okay. Thanks. And I just want to ask you

17 a couple of questions about methodology B if I could?

18 A. Sure.

19 46 Q. I'm trying to compare methodology B and

20 methodology A.

21 So I want to just state my understanding to

22 you and if you could just tell me if I am correct or not?

23 A. Sure.

24 47 Q. So methodology A is reports and analyses

25 CAD event data from the five parks but methodology B isn't

A4570

A8855

1 confined to the five parks?

2 A. Correct.

3 48 Q. It's based on calls from the city as a

4 whole; right?

5 A. That is correct. It's the word "tent" or

6 the word "encampment" are recorded in those sections from

7 the dispatchers. So if the word or encampment is

8 mentioned by a call taker or the word tent is mentioned by

9 a call taker that's mentioned in the notes from the CAD

10 call and they able to extract all the calls where the word

11 tent or encampment are mentioned.

12 So it doesn't mean that it's just from

13 those five parks. What we are seeing is the activity

14 clustered in the downtown core area.

15 49 Q. Okay. And so but not just from those five

16 parks?

17 A. Yes, that's correct.

18 50 Q. Okay. Just so I'm clear, in this affidavit

19 you don't provide evidence about the CAD event data for

20 the City as a whole where the notes don't mention

21 encampment or don't mention tent.

22 A. I do not.

23 51 Q. Okay. I think, those are all my questions

24 for you today, Inspector. Thank you very much for your

25 time.

1 A. My pleasure.

2 -- The examination concluded at 1:12 p.m. --

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

I hereby certify the foregoing is a full, true, and correct
transcription of all of my oral stenographic notes to the best
of my ability so taken at the Cross-Examination of INSPECTOR
FRANK MISCIONE, given under oath before me on the 22nd of
August, 2024.

Amy Armstrong, CVR-RVR

Certified Realtime Verbatim Reporter #7305
Certified Commissioner of Oaths
Certified this 28th of August, 2024

Reproductions of this transcript are in direction violation of
the O.R. 587/91 of The Administration of Justice Act January 1,
1990, and are not certified without the original signature of
the Certified Court Reporter. Absence of this certification
and signature is indication this document has been reproduced
without the permission of Nimigan Mihalovich Reporting Inc.,
and as such is not an original document.

A4571

-	12/5 12/8 12/9 12/15 13/6 13/11 13/13 13/23 15/16 15/18	comes [3] 8/12 8/15 8/18 coming [1] 4/4
-AND [1] 1/14	area [1] 13/14	Commencing [1] 4/1
1	aren't [1] 12/10	Commissioner [1] 15/13
1990 [1] 15/18	Armstrong [1] 15/8	community [2] 2/6 8/16
1:00 [1] 4/1	ARNOLD [1] 1/7	compare [1] 12/19
1:12 [1] 14/2	as [12] 3/14 4/12 4/14 5/5 5/5 6/11 7/21 8/21 10/12 13/3 13/20 15/22	complete [1] 3/15
2	ASHLEY [1] 1/9	computer [1] 8/11
2024 [4] 1/20 1/21 9/25 15/5	ask [4] 5/9 7/2 12/1 12/16	computer-aided [1] 8/11
22nd [2] 1/21 15/4	at [11] 4/1 6/1 6/7 9/12 10/12 10/13 10/14 11/1 11/22 14/2 15/3	computers [1] 6/7
24 [1] 1/20	August [2] 1/21 15/5	concluded [1] 14/2
28th [1] 15/14	August,2024 [1] 15/14	conducted [1] 1/21
3	B	confined [1] 13/1
395 [1] 9/24	back [2] 11/24 12/3	constitute [1] 3/15
5	based [3] 12/13 12/14 13/3	consult [1] 5/2
587/91 [1] 15/17	basis [2] 8/10 10/24	coordinated [1] 8/17
7	be [3] 3/14 4/17 11/2	core [1] 13/14
7305 [1] 15/12	bear [1] 5/19	COREY [1] 1/9
77187 [1] 1/1	because [4] 6/6 8/25 10/10 11/25	correct [12] 7/9 7/10 8/4 8/5 10/3 11/3 12/11 12/22 13/2 13/5 13/17 15/1
9	Beemer [1] 11/12	could [6] 5/19 6/12 10/11 11/25 12/17 12/22
9-1-1 [2] 8/22 8/22	been [3] 4/11 4/15 15/20	count [1] 10/23
91 [1] 15/17	before [3] 4/18 11/25 15/4	counted [1] 10/21
A	begin [2] 4/7 6/16	couple [5] 6/12 7/2 9/13 9/20 12/17
ability [1] 15/3	best [2] 6/2 15/2	court [5] 1/1 1/3 4/16 4/18 15/19
able [1] 13/10	better [1] 6/3	covered [1] 4/11
about [10] 5/15 6/12 7/3 7/20 8/25 9/13 9/20 12/1 12/17 13/19	between [2] 1/4 10/24	Crime [3] 7/6 7/20 7/22
above [1] 1/21	BEVIN [1] 2/11	Crime Information Analysis Unit [2] 7/6 7/22
Absence [1] 15/19	big [1] 5/24	Crisis [1] 7/25
acronym [1] 7/21	bit [3] 4/8 5/19 10/17	cross [6] 1/20 4/3 4/9 4/14 4/17 15/3
Act [1] 15/17	boundaries [1] 12/15	cross-examination [5] 1/20 4/3 4/9 4/17 15/3
action [1] 1/21	BRADLEY [1] 1/7	cross-examining [1] 4/14
activity [2] 10/21 13/13	Branch [1] 7/25	CURTIS [1] 2/7
addition [1] 4/22	but [4] 4/12 9/13 12/25 13/15	CV [1] 1/1
adjust [2] 5/18 6/6	C	CV-21-77187 [1] 1/1
Administration [1] 15/17	CAD [14] 7/13 7/24 8/9 8/11 8/14 8/20 8/23 9/24 10/21 11/7 11/21 12/25 13/9 13/19	CVR [1] 15/8
ADVISEMENTS [2] 3/13 3/20	CALDWELL [1] 1/7	CVR-RVR [1] 15/8
affidavit [15] 1/20 4/15 4/17 5/1 5/4 5/18 5/23 6/10 7/3 8/10 10/6 10/12 10/14 12/8 13/18	call [5] 8/12 8/22 13/8 13/9 13/10	D
affirmation [1] 1/20	calls [4] 10/23 11/22 13/3 13/10	DARRIN [1] 1/6
Affirmed [1] 4/2	can [16] 5/1 5/4 6/2 6/10 6/18 6/21 6/22 6/23 7/1 7/19 9/12 10/7 10/8 10/9 10/11 11/9	data [15] 7/8 7/13 7/24 8/9 8/11 8/14 9/1 9/3 9/5 10/21 11/7 11/21 12/3 12/25 13/19
Afternoon [1] 4/5	can't [1] 6/5	date [1] 6/11
again [1] 10/4	Canada [1] 2/13	dated [1] 1/20
ahead [1] 12/3	captured [2] 8/18 8/23	day [1] 8/19
aided [1] 8/11	case [1] 4/16	delineate [1] 10/24
all [5] 4/10 12/6 13/10 13/23 15/2	CASSANDRA [1] 1/8	DELOREY [1] 1/7
already [1] 4/11	certification [1] 15/19	described [1] 12/7
also [1] 5/2	certified [5] 15/12 15/13 15/14 15/18 15/19	descriptions [2] 9/16 9/16
am [3] 4/6 7/23 12/22	certify [1] 15/1	determines [1] 12/14
AMMY [1] 1/9	Chambers [1] 2/4	didn't [1] 7/11
Amy [1] 15/8	CHOUDHRY [4] 2/3 3/5 4/3 4/6	different [1] 6/6
analyses [1] 12/24	CHRISTINE [1] 1/7	direction [1] 15/16
Analysis [3] 7/6 7/21 7/22	CIAU [6] 7/16 7/17 7/21 7/23 7/24 8/2	dispatch [1] 8/11
answer [1] 4/24	city [9] 1/16 2/10 4/15 8/17 11/14 12/10 12/14 13/3 13/20	dispatchers [3] 8/13 8/22 13/7
answering [1] 5/1	clarify [1] 10/2	distinct [1] 8/9
any [2] 5/14 9/12	clear [1] 13/18	do [16] 4/23 4/24 5/4 5/8 5/14 5/21 5/22 6/2 6/6 7/16 9/4 9/8 9/10 9/18 9/19 13/22
anything [1] 5/9	Clinic [1] 2/6	document [4] 9/2 9/9 15/20 15/22
APPEARANCES [1] 1/23	clustered [1] 13/14	does [2] 3/14 9/2
Appendix [1] 10/14	collect [2] 4/24 7/11	doesn't [1] 13/12
Appendix A [1] 10/14	collected [2] 7/7 7/13	don't [4] 12/2 13/19 13/20 13/21
Applicants [3] 1/13 2/2 4/7	collects [3] 7/24 7/25 8/7	done [1] 11/7
are [22] 4/25 8/16 10/2 10/4 10/12 10/21 10/23 10/25 11/4 11/5 11/6 12/4	come [1] 11/22	down [6] 5/3 6/14 6/21 6/22 9/11 10/15
		downtown [1] 13/14

A8856

A4572

<p>E</p> <p>each [2] 8/19 9/21 else [1] 5/9 encampment [11] 7/14 8/1 8/7 8/15 8/21 10/1 12/9 13/6 13/7 13/11 13/21 encampments [1] 4/16 end [3] 5/19 6/7 6/23 engagement [7] 7/14 8/1 8/8 8/15 8/16 8/21 8/21 enlarge [1] 5/25 enough [1] 5/24 entirely [1] 4/25 event [3] 7/13 12/25 13/19 events [3] 8/23 9/24 12/7 everybody's [1] 6/6 evidence [2] 4/18 13/19 examination [6] 1/20 4/3 4/9 4/17 14/2 15/3 examining [1] 4/14 Exhibit [1] 9/7 Exhibit A [1] 9/7 exhibits [2] 3/8 5/1 extract [1] 13/10</p>	<p>9/13 9/20 10/10 11/7 HEEGSMA [1] 1/6 help [1] 10/11 helps [2] 9/6 11/19 here [13] 5/19 6/2 6/24 8/3 9/8 9/15 9/23 10/10 11/2 11/6 11/7 11/19 12/3 hereby [1] 15/1 highlighting [1] 8/3 homeless [1] 4/16 HORNER [1] 1/8 hosted [1] 1/21 how [3] 6/2 8/9 10/24 HPS [1] 7/5</p>	<p>L</p> <p>last [1] 10/14 LAUZON [1] 1/9 lawyers [1] 4/6 Legal [1] 2/6 let [2] 6/2 6/16 letting [1] 6/16 LEWIS [1] 1/9 like [7] 4/12 4/22 4/23 6/14 9/12 10/7 12/1 lines [1] 11/2 LINSLEY [1] 1/10 list [3] 3/15 11/1 11/2 LLP [1] 2/13 locations [2] 10/1 12/9 logs [1] 8/18 long [1] 5/5 look [5] 9/12 10/8 10/9 10/11 10/13 looking [1] 11/1</p>
<p>F</p> <p>FILE [1] 1/1 filed [1] 4/15 first [1] 5/22 five [15] 10/2 10/4 10/20 10/25 11/2 11/4 11/5 11/8 11/9 11/19 12/8 12/25 13/1 13/13 13/15 foregoing [1] 15/1 four [1] 11/17 Frank [4] 1/20 3/4 4/2 15/4 free [1] 4/25 full [1] 15/1</p>	<p>I</p> <p>I'll [1] 5/9 I'm [17] 4/7 4/14 5/2 5/17 5/18 6/15 8/3 8/24 8/25 9/11 10/15 10/17 11/1 11/24 12/2 12/19 13/18 identify [1] 11/9 if [17] 4/22 4/23 5/3 5/8 5/19 6/5 6/12 7/22 10/7 10/11 10/13 11/25 12/2 12/17 12/22 12/22 13/7 important [1] 4/19 in [20] 1/20 4/7 4/15 4/22 5/1 7/15 8/3 8/12 8/18 8/23 10/6 10/12 10/17 11/21 12/8 13/6 13/9 13/14 13/18 15/16 Inc [2] 1/22 15/21 indication [1] 15/20 information [7] 7/6 7/20 7/22 7/25 8/1 8/15 8/20 Inspector [6] 1/20 3/4 4/2 4/4 13/24 15/3 Inspector Miscione [1] 4/4 into [1] 4/17 introduction [1] 4/8 is [33] 4/5 4/18 5/24 6/3 6/3 6/10 6/11 7/13 7/15 7/23 8/3 8/9 8/10 8/11 8/13 8/14 8/18 8/20 8/22 8/22 9/8 10/6 10/24 11/7 12/11 12/24 13/5 13/7 13/8 13/13 15/1 15/20 15/22 isn't [1] 12/25 it [17] 4/12 4/18 5/10 5/25 6/5 6/6 6/10 6/12 7/11 7/15 7/23 10/6 10/7 10/10 10/17 12/7 13/12 it's [9] 5/22 6/1 6/15 11/19 12/13 12/13 13/3 13/5 13/12 itself [1] 12/13</p>	<p>M</p> <p>MACDONALD [1] 1/9 MARCHAND [1] 1/6 MARIO [1] 1/6 marked [1] 3/9 MARSHALL [1] 1/10 matter [1] 4/7 me [12] 4/22 5/3 5/20 6/2 6/6 6/16 10/9 10/11 11/9 11/19 12/22 15/4 mean [1] 13/12 memo [1] 8/12 memory [2] 5/5 6/17 mention [2] 13/20 13/21 mentioned [5] 11/21 13/8 13/8 13/9 13/11 methodology [11] 9/16 9/17 9/17 9/23 11/22 12/7 12/17 12/19 12/20 12/24 12/25 methodology A [6] 9/16 9/23 11/22 12/7 12/20 12/24 methodology B [2] 9/17 12/17 Mihailovich [2] 1/21 15/21 mind [1] 12/2 Miscione [5] 1/20 3/4 4/2 4/4 15/4 MISTY [1] 1/10 moment [2] 4/23 6/1 MONAHAN [1] 1/9 more [1] 11/2 most [1] 6/11 MR [2] 3/5 4/3 Ms. [1] 4/12 Ms. Shores [1] 4/12 much [1] 13/24 MUSCATO [1] 1/7 my [9] 4/5 4/8 5/19 7/15 12/21 13/23 14/1 15/2 15/3</p>
<p>G</p> <p>Gage [1] 11/10 Gage Park [1] 11/10 generally [1] 8/20 get [1] 4/12 give [3] 5/10 9/4 10/9 given [2] 8/13 15/4 giving [1] 4/8 GLEN [1] 1/8 Global [1] 2/4 GNATUK [1] 1/8 go [5] 6/21 6/22 9/11 11/24 12/3 GOGO [1] 1/8 GOGO-HORNER [1] 1/8 going [8] 4/7 5/2 5/17 5/18 6/15 9/11 10/17 11/24 good [4] 6/1 6/4 12/4 12/5 GORD [1] 1/6 got [1] 6/6 Gowling [1] 2/13 Great [1] 11/24 GREAVES [1] 1/11 guide [2] 3/13 3/14</p>	<p>J</p> <p>J.C [1] 11/12 JAHMAL [1] 1/10 January [1] 15/17 JOHNSON [1] 2/12 JOJO [1] 2/12 JORDAN [1] 1/8 JULIA [1] 1/9 JULIA LAUZON [1] 1/9 July [3] 1/20 9/25 9/25 July 1, 2023, to July 30, 2024 [1] 9/25 just [25] 4/7 5/15 5/19 6/2 6/12 6/16 7/2 7/19 8/2 8/24 9/7 9/20 10/2 10/15 10/17 11/19 12/1 12/2 12/6 12/16 12/21 12/22 13/12 13/15 13/18 JUSTICE [2] 1/3 15/17</p>	<p>N</p> <p>name [1] 4/5 necessarily [2] 3/15 8/21 need [3] 4/19 5/5 6/5 Nimigan [2] 1/21 15/21 no [2] 1/1 5/16 None [4] 3/9 3/18 3/21 3/24 not [10] 3/14 8/20 9/4 12/9 12/13 12/22 13/15 13/22 15/18 15/22 noted [3] 3/18 3/21 3/24 notes [3] 13/9 13/20 15/2 now [2] 5/17 9/7</p>
<p>H</p> <p>had [2] 11/25 12/7 Haki [1] 2/4 Hall [1] 11/14 HAMILTON [5] 1/16 2/6 2/10 8/18 12/14 happen [1] 5/8 has [2] 4/11 15/20 have [10] 4/15 5/14 5/16 6/12 8/4 9/8</p>	<p>K</p> <p>kind [1] 9/15 know [3] 4/14 4/19 4/19 KRISTEN [1] 1/6</p>	<p>A4573</p>

<p>O</p> <p>oath [1] 15/4 Oaths [1] 15/13 officers [1] 8/13 offices [1] 1/21 OGDEN [1] 1/10 Okay [30] 5/6 5/12 5/14 5/17 6/5 6/8 6/20 6/21 6/23 7/1 7/2 8/2 8/24 9/6 9/11 9/14 10/15 10/22 11/1 11/11 11/17 11/24 12/3 12/4 12/6 12/12 12/16 13/15 13/18 13/23 on [18] 1/20 4/12 4/14 5/2 5/9 5/10 5/18 5/21 6/18 8/21 9/4 9/15 11/2 11/25 12/13 12/14 13/3 15/4 one [5] 4/6 6/11 10/9 10/13 12/2 only [2] 12/7 12/8 ONTARIO [1] 1/2 or [12] 5/3 5/9 6/5 8/11 10/7 11/5 12/22 13/5 13/7 13/8 13/11 13/21 oral [1] 15/2 organize [1] 7/11 organized [2] 7/7 7/14 original [2] 15/18 15/22 other [2] 9/12 12/9 our [3] 8/12 8/13 8/19 out [1] 7/19 outline [1] 10/20 outlined [1] 11/7 outside [2] 7/15 7/17 over [1] 6/16</p>	<p>Reading [1] 6/25 Realtime [1] 15/12 recently [1] 6/11 recognize [2] 9/9 9/18 record [3] 4/5 4/12 10/5 recorded [1] 13/6 reduce [1] 10/17 refer [1] 4/25 referred [3] 7/21 8/4 11/5 referring [3] 7/23 10/12 12/3 refresh [2] 5/4 6/17 REFUSALS [2] 3/13 3/23 regarded [1] 3/14 regarding [1] 4/16 repeat [1] 4/22 reported [1] 10/6 Reporter [2] 15/12 15/19 Reporting [2] 1/22 15/21 reports [2] 9/4 12/24 reproduced [1] 15/20 Reproductions [1] 15/16 reread [2] 5/5 6/17 Respondent [1] 1/18 response [2] 7/25 8/17 rest [1] 12/10 review [1] 5/11 right [7] 4/10 11/13 11/15 12/1 12/6 12/8 13/4 runs [1] 6/16 RVR [1] 15/8</p>	<p>such [1] 15/22 SUJIT [2] 2/3 4/6 Sujit Choudhry [1] 4/6 SUPERIOR [1] 1/3 Sure [6] 9/22 10/7 10/11 10/13 12/18 12/23 swore [1] 6/11</p> <p>T</p> <p>take [6] 4/23 5/5 6/10 6/14 9/7 10/9 taken [2] 1/20 15/3 taker [2] 13/8 13/9 talked [1] 8/25 TAYLOR [1] 1/8 team [3] 7/14 7/15 8/17 tell [2] 4/19 12/22 tent [4] 13/5 13/8 13/11 13/21 than [1] 11/2 thank [4] 4/4 5/7 5/17 13/24 thanks [3] 11/20 11/24 12/16 that [29] 4/15 4/19 5/24 6/3 6/3 6/16 7/4 7/15 7/19 7/20 7/23 8/6 8/9 8/9 8/12 8/14 8/18 8/18 9/6 9/23 10/18 11/4 11/19 11/25 12/7 12/11 12/15 13/5 13/12 that's [10] 6/4 6/18 7/10 7/22 8/3 8/5 10/3 11/17 13/9 13/17 their [3] 6/7 8/16 8/18 them [2] 5/2 5/2 then [1] 6/23 there [8] 5/2 8/20 8/22 9/24 10/8 10/18 11/2 11/6 therefore [1] 4/18 these [4] 9/21 11/4 11/5 11/19 they [7] 7/13 8/16 9/4 9/4 12/9 12/9 13/10 things [2] 5/11 5/19 think [1] 13/23 this [24] 1/21 3/14 4/5 4/7 4/11 4/17 4/19 6/10 6/11 6/19 7/3 7/7 7/21 9/2 9/8 9/9 11/1 11/2 12/1 13/18 15/14 15/16 15/19 15/20 those [12] 9/2 9/5 9/18 10/2 10/4 10/23 11/23 12/8 13/6 13/13 13/15 13/23 thoughts [1] 4/24 time [2] 5/10 13/25 today [2] 4/9 13/24 together [1] 9/3 top [4] 10/20 10/25 11/7 11/9 transcript [1] 15/16 transcription [1] 15/2 true [1] 15/1 truth [1] 4/20 try [1] 9/2 trying [2] 8/25 12/19 two [2] 6/16 8/25</p>
<p>P</p> <p>p.m [2] 4/1 14/2 page [9] 3/3 5/22 6/19 9/12 9/12 9/13 10/14 10/18 11/25 page 6 [2] 9/12 9/13 pages [1] 6/16 paragraph [6] 6/15 6/15 6/17 6/18 6/24 8/3 paragraph 6 [5] 6/15 6/17 6/18 6/24 8/3 park [6] 11/10 11/12 11/18 12/13 12/14 12/15 parks [13] 10/2 10/4 10/20 10/25 11/4 11/5 11/6 11/23 12/8 12/25 13/1 13/13 13/16 part [2] 5/3 7/15 PATRICK [1] 1/11 patrol [1] 8/13 PDF [1] 5/21 per [1] 10/23 permission [1] 15/21 pieces [2] 9/1 9/2 PIERRE [1] 1/10 please [3] 4/23 4/24 6/15 pleasure [1] 14/1 plenty [1] 5/10 portion [1] 6/18 preface [1] 4/8 proceed [1] 7/1 provide [1] 13/19 pulled [1] 9/8 put [7] 4/17 5/2 5/8 5/10 5/17 9/2 9/15</p>	<p>S</p> <p>said [1] 5/15 say [3] 7/23 8/6 9/23 screen [6] 5/3 5/9 5/10 5/18 5/21 9/15 scroll [3] 5/3 9/11 10/7 scrolling [1] 10/15 second [4] 7/15 10/9 10/13 12/2 sections [1] 13/6 see [1] 5/21 seeing [2] 10/21 13/13 seem [1] 11/2 selected [1] 10/1 SELL [1] 2/7 separate [1] 9/4 service [3] 8/12 10/24 11/22 several [1] 11/6 SHAWN [1] 1/7 SHERRI [1] 1/10 SHORES [2] 2/11 4/12 should [2] 3/14 5/24 signature [2] 15/18 15/20 sir [2] 4/9 5/14 size [1] 10/17 SMYTH [1] 1/6 so [36] 4/14 4/18 5/3 5/4 5/8 5/14 5/17 6/10 6/14 6/16 6/17 7/2 7/3 7/11 7/17 7/22 7/24 8/24 9/7 9/11 9/15 9/23 10/13 10/18 11/1 11/4 11/19 11/21 12/6 12/21 12/24 13/7 13/12 13/15 13/18 15/3 some [2] 4/11 12/3 something [2] 5/5 7/15 sorry [3] 7/17 7/18 7/20 spell [1] 7/19 start [1] 6/18 state [1] 12/21 states [1] 7/3 statistics [1] 7/14 stenographic [1] 15/2</p>	<p>U</p> <p>under [2] 3/20 15/4 understand [2] 8/2 8/25 understanding [2] 8/24 12/21 UNDERTAKINGS [2] 3/13 3/17 uniform [1] 8/13 unit [5] 7/6 7/21 7/22 8/7 8/19 up [5] 5/3 5/9 5/10 5/18 9/8 upon [1] 1/20 us [1] 7/19</p>
<p>Q</p> <p>question [5] 4/23 4/24 5/1 12/1 12/6 questions [9] 5/9 5/14 5/16 6/12 7/3 9/13 9/20 12/17 13/23</p> <p>R</p> <p>read [3] 6/5 6/17 6/23</p>		<p>V</p> <p>Verbatim [1] 15/12</p>

A8858

A4574

<div>V</div> <div> very [1] 13/24 via [1] 1/21 videoconference [1] 1/21 violation [1] 15/16 </div> <div>W</div> <div> want [6] 5/3 5/8 7/2 9/7 12/16 12/21 WARD [1] 1/11 we [8] 7/21 9/12 10/21 10/24 11/7 12/4 12/5 13/13 we've [1] 11/6 well [2] 4/13 10/12 were [1] 9/24 what [9] 5/15 7/13 7/23 8/3 10/4 10/24 11/6 12/14 13/13 when [1] 8/6 where [4] 10/12 10/20 13/10 13/20 which [3] 8/22 9/8 10/24 whole [2] 13/4 13/20 will [3] 4/17 5/4 9/13 within [1] 8/16 without [2] 15/18 15/21 WITNESS [1] 3/4 WLG [1] 2/13 Woodlands [2] 11/17 11/18 Woodlands Park [1] 11/18 word [6] 7/22 13/5 13/6 13/7 13/8 13/10 working [1] 8/17 would [9] 4/12 4/15 4/22 6/14 7/16 9/12 10/20 11/22 12/1 </div> <div>Y</div> <div> Yeah [1] 6/9 yes [17] 4/21 5/7 5/13 5/24 6/4 6/13 7/10 7/20 8/5 9/10 9/19 10/16 10/18 10/19 11/3 12/5 13/17 you [56] 4/4 4/9 4/14 4/14 4/19 4/19 4/22 4/25 5/1 5/3 5/4 5/5 5/7 5/9 5/10 5/14 5/17 5/19 5/21 5/24 6/5 6/5 6/11 6/14 6/17 6/18 6/22 6/23 7/1 7/11 7/19 8/4 8/6 8/25 9/7 9/8 9/12 9/18 9/23 10/7 10/8 10/11 10/12 10/13 11/4 11/9 11/25 12/1 12/2 12/7 12/16 12/22 12/22 13/19 13/24 13/24 you'd [1] 4/23 your [15] 4/15 4/16 4/24 4/25 5/4 5/18 6/10 6/17 7/3 8/7 8/10 9/16 10/12 12/8 13/24 yourself [1] 7/12 </div>		<div>A8859</div> <div></div> <div>A4575</div>
---	--	---

Heegsma et al
Applicants

-and-

CITY of HAMILTON
Respondents

Court File No. CV-21-00077187-0000

<p><i>Ontario</i> Superior Court of Justice</p> <p>PROCEEDING COMMENCED AT HAMILTON</p> <p>APPLICATION RECORD VOLUME 16 TABS 125-135</p>	
	<p>COMMUNITY LEGAL CLINIC OF YORK REGION 21 Dunlop Street, Richmond Hill, ON L4C 2M6 Sharon Crowe (LSO# 47108R) sharon.crowe@yr.clcj.ca</p> <p>Michelle Sutherland (LSO# 70159T) michelle.sutherland@yr.clcj.ca</p> <p>Curtis Sell (LSO # 84128A) curtis.sell@yr.clcj.ca</p> <p>HÁKI CHAMBERS 319 Sunnyside Avenue, Toronto, ON M6R 2R3 Sujit Choudhry (LSO# 45011E) sujit.choudhry@hakilchambers.com</p> <p>ROSS & MCBRIDE LLP 1 King Street West, 10th Floor, Hamilton, ON L8P 1A4 Wade Poziomka (LSO# 59696T) wpoziomka@rossmcbride.com</p> <p>Counsel to the Applicants</p>

A4576

A8860