

**OFFICE OF THE INFORMATION AND PRIVACY COMMISSIONER  
FOR BRITISH COLUMBIA**

In the matter of the inquiry under part 5 of the *Freedom of Information  
and Protection of Privacy Act*

Between:

ROB WIPOND

The Applicant

And:

THE VICTORIA POLICE DEPARTMENT

The Public Body

**AFFIDAVIT**

I, Paul Patterson, of 2120 Cambie Street, City of Vancouver, Province of British Columbia, MAKE OATH AND SAY THAT:


1. I am a Senior Director of Public Affairs and Marketing with the Vancouver Police Department (the "VPD") and as such have personal knowledge of the facts hereinafter stated, except where such facts are stated to be based on information and belief, in which case I verily believe the same to be true.
2. In 2004 I joined the VPD as its first Director of Public Affairs and Marketing. I was promoted to Senior Director in 2008 and assumed additional responsibility for the Community Policing Sergeant, Block Watch, Citizens' Crime Watch, Business Liaison and Victim Services. My position responsibilities include providing advice to the VPD Executive Team on external communications and news media issues, including during emergency situations such as the 2011 Vancouver Stanley Cup Riot ("Riot").


3. In or around October or November 2011, VPD Deputy Chief Constable Warren Lemcke asked me to share with the British Columbia Association of Chiefs of Police (the "BCACP") the advice that I had provided to the Vancouver Police Executive during the Riot as well as the lessons learned with respect to proper crisis and media relations management.
4. On or about November 16, 2011, I attended a meeting of the BCACP and shared with the BCACP members the advice that I had provided to the VPD Executive Team during the Riot. The meeting was conducted in private and it was my understanding that I was speaking to representatives of other police and law enforcement agencies in confidence.
5. I have been shown a copy of an excerpt from BCACP meeting minutes dealing with my presentation. I am advised by Darrin Hurwitz, Administrative Legal Advisor, that these minutes are subject of this inquiry and are referred to as record 5.
6. The information I shared with BCACP included my advice and in some cases my recommended course of action that I had provided to the VPD Executive with respect to the VPD Riot related to managing the message prior to and during the event, the related law enforcement investigation, and how to best approach issues around the prosecution of Riot related offenders. Interwoven within my advice and recommended course of action was an account of the Riot and how the VPD responded to it from a public relations and media perspective.
7. I shared this narrative of the VPD's response to the Riot as the context within which to share with the BCACP the advice and recommendations that I provided to the VPD Executive Team prior to, during, and subsequent to the Riot. As such the narrative formed an integral part of the advice and recommendations to BCACP based on the experience during the Riot.
8. I shared with the BCACP this advice through a step by step account and illustration of the Riot events and challenges, and used this information to draw out my advice to the VPD Executive based on the circumstances of the Riot. I also shared with the BCACP my advice to the VPD Executive Team as to how to best approach future circumstances based on a similar fact pattern and circumstance. My talk to the BCACP included information related to policy options of alternative courses of actions considered by the VPD, as I presented to the VPD Executive.
9. Where members of the BCACP asked me specific questions, those questions related to the advice developed by the VPD in relation to crisis management and media relations during the Riot. For example, a discussion regarding if anything would be done differently today, required discussion of the advice developed by myself and the VPD Executive for the VPD. In response to the questions raised, it was necessary to share and discuss the advice and recommendations provided

to the VPD in the context of if anything would be done differently today and my response to the questions posed by the BCACP members reveals advice and options I discussed with the VPD Executive as part of policy options for approaching the Riot, including before the Riot, during the Riot, and managing the related investigation and charge approval process.

10. Record 5 contains much of the information that I shared with BCACP in confidence, including with respect to the general deliberations, advice, and recommended course of actions as discussed by the VPD Executive. This advice and recommendation was developed by me and others in the performance of our duties on behalf of the VPD. It was intended for and used by the VPD Executive and was provided to BCACP for use by its members who are police and law enforcement agencies.

SWORN BEFORE ME at Vancouver,  
British Columbia, this 2 day of March  
2015

  
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Commissioner for taking Affidavits  
within the Province of British  
Columbia



Paul Patterson

**DARRIN HURWITZ**  
3 *Barrister and Solicitor*  
Vancouver Police Department  
3585 Gravelly Street, Vancouver, BC V6L 5J5  
tel: 604.717.0111