



Office of the City
Solicitor

March 3, 2015

Office of the Information and Privacy
Commissioner for British Columbia
4th Floor, 947 Fort Street
Victoria, BC V8V 3K3

**OUR FILE: 15-0005
BY EMAIL and COURIER**

**Attention: Cindy Hamilton
Registrar of Inquiries**

Dear Ms. Hamilton:

**Re: Inquiry under Part 5 of the *Freedom of Information and Protection of Privacy Act*
between Rob Wipond and the Victoria Police Department; OIPC File: F13-55713**

I am counsel for the Victoria Police Department ("VicPD") in the above referenced inquiry. Enclosed is the initial written submission of VicPD together with evidence and authorities relied on by VicPD except for the previous decisions of the OIPC and sections of the Act. Also included, in a separate sealed envelope, are copies of the documents at issue in this inquiry redlined to indicate severing applied to documents released to the Applicant.

The following documents are included with this letter:

1. Initial submission of VicPD;
2. Affidavit #1 of Paul Patterson, sworn March 2, 2015;
3. Affidavit #1 of Debra Taylor, sworn March 2, 2015
4. Affidavit #1 of Steven Ing, sworn March 3, 2015
5. Affidavit #1 of Kyle Friesen, affirmed March 3, 2015;
6. *British Columbia (Minister of Environment, Lands and Parks) v. British Columbia (Information and Privacy Commissioner)* (1995), 16 BCLR (3d) 64 (SC);
7. *John Doe v. Ontario (Finance)*, 2014 SCC 36;
8. *Fraser Milner Casgrain LLP v. Canada (Minister of National Revenue)*, 2002 BCSC 1344;
9. Section 7 of the *Lobbyists Registration Act*;
10. Section 182 of the *Police Act*;
11. Documents at issue (in a separate sealed envelope).

In accordance with a previous agreement between the parties, a copy of this letter and the above listed documents, except for item 11, will be provided to the Applicant electronically today.

Please do not hesitate to contact the writer if you have any questions.

Sincerely yours,

CITY OF VICTORIA

Per:

A handwritten signature in blue ink, appearing to read "Tom Zworski".

Tom Zworski
City Solicitor

1 Centennial Square
Victoria
British Columbia
V8W 1P6

Tel: 250-361-0547
Fax: 250-361-0525

www.victoria.ca