



TORONTO POLICE SERVICE DISCIPLINE HEARING  
IN THE MATTER OF ONTARIO REGULATION 268/10  
MADE UNDER THE POLICE SERVICES ACT, RSO 1990,  
AND AMENDMENTS THERETO:

IN THE MATTER OF THE  
THE TORONTO POLICE SERVICE  
AND CONSTABLE ADAM CAMPOLI (10129)

Charge: Use profane, abusive or insulting language or otherwise uncivil to a member of  
the public

PENALTY DECISION

Hearing Officer: Superintendent Riyaz J. Hussein; Toronto Police Service

Prosecutor: Ms. Alexandra Ciobotaru, Toronto Police Service

Defence Counsel: Mr. David Butt

Public Complainant: Mr. D. John

Case Number: 2.2019

Hearing Dates: 2019.10.07, 2019.10.08, 2019.10.10, 2019.10.11 (Trial)  
2020.01.15 (Penalty Submissions)

Decision Date: 2020.02.13

Before commencing my decision on penalty and sentencing in this matter, I would like to thank Mr. David Butt, defence counsel, and Ms. Alexandra Ciobotaru, the Service prosecutor, for their joint submissions as to penalty and exhibits tendered, all of which have assisted me in reaching my decision.

***Note: This decision is divided into four parts: PART I: OVERVIEW; PART II: THE HEARING; PART III: ANALYSIS AND FINDINGS FOR DISPOSITION; and PART IV: DISPOSITION.***

## **PART I: OVERVIEW**

### **Background**

1. Constable Adam Campoli (PC Campoli) #10129 commenced his employment with the Toronto Police Service (TPS) in 2008. PC Campoli presently holds the rank of First Class Constable and is assigned to 23 Division, Major Crime Unit.

### **Allegations of Misconduct**

2. Constable Adam Campoli # 10129, being a member of the Toronto Police Service, you are alleged to have committed misconduct in that you did use profane, abusive or insulting language or is otherwise uncivil to a member of the public, contrary to Section 2(1) (a) (v) of the Schedule Code of Conduct of Ontario Regulation 268/10 and therefore, contrary to Section 80(1) (a) of the Police Services Act, R.S.O. 1990 as amended. The particulars of the allegation are:

Being a member of the Toronto Police Service, you were attached to 23 Division in a uniform capacity.

On Tuesday, February 4th, 2014, you were on duty and received a radio call regarding a stolen vehicle at 32 Stoffel Drive.

You and your partner, Police Constable Joshua Sarasua (9439) attended 627 Dixon Road to speak with the complainant, D.J., and commenced an investigation in relation to the stolen vehicle.

You used profane, abusive or insulting language towards D.J.

In doing so, you committed misconduct in that you did use, profane, abusive or insulting language or is otherwise uncivil to a member of the public.

### **Plea**

3. On December 6, 2019, Constable Adam Campoli # 10129, after trial was found guilty of use profane, abusive or insulting language or is otherwise uncivil to a member of the public, contrary to the Police Services Act.

### **Decision**

4. I have carefully considered the joint submission and relevant information presented by both the prosecutor and defence counsel as well as reviewed previous tribunal decisions. In light of the mitigating and aggravating circumstances, and in particular, the seriousness of the matter, I impose the following sanction under Section 85(7) (a) of the Police Services Act (PSA).

For PC Campoli is guilty of: use profane, abusive or insulting language or is otherwise uncivil to a member of the public – reprimand.

And further PC Campoli is ordered under Section 85 (7) (b) of the Police Services Act to attend Tactical Communication training as instructed by Toronto Police College.

My reasons for this are as follows.

## **PART II: THE HEARING**

### **Exhibits**

5. The exhibits for this matter are listed in Appendix 'A', attached hereto. To avoid repetition, all exhibits will be referred to by number without the preface of Appendix 'A'.

### **Representation**

6. In this matter, Mr. Butt represented PC Campoli during the proceeding Trial and Ms. Alexandra Ciobotaru represented the TPS.

### **Positions on Penalty**

7. The positions on penalty are in congruence. Defence and prosecution agree by joint submission to a reprimand plus tactical communication training. A summary of Ms. Alexandra Ciobotaru's and Mr. Butt's submissions, in support of this position, follows.

### **Witnesses**

8. No witnesses were called by the prosecution or the defence.
9. The Public Complainant elected not to appear for the penalty phase of this matter.

### **Submissions**

#### **Prosecution Submissions**

10. The prosecutor - Ms. Alexandra Ciobotaru began her submissions by entering a Book of Records (Exhibit 22) and a Book of Authorities (Exhibit 23).
11. Ms. Alexandra Ciobotaru submitted that the facts in this case are straightforward, the Misconduct is clear and the joint disposition proposed is consistent with previous cases and satisfies the principals of our discipline system.

12. She first outlined the objectives of discipline which are to: correct unacceptable behaviour, deter others from similar behaviour, and assure the public the police are under control.
13. Ms. Alexandra Ciobotaru highlighted that there are fifteen considerations governing the determination of an appropriate disposition and they can be found in the 2017 Legal Aspects of Policing Manual, by Ceysens and Childs; these principals were submitted at Tab 1, in Exhibit 22. The prosecution fully considered all 15 of these principles and in the submissions to penalty, noted the following as particularly relevant in this matter.
14. Ms. Alexandra Ciobotaru submitted that PC Campoli's actions have *public interest* implications as it relates to the public trust. She added, public interest arises where the misconduct has offended or undermined the public confidence in police. It is clear from the trial that PC Campoli's actions have had an impact on Mr. Darren John, a member of the public.
15. In further addressing public trust, Ms. Alexandra Ciobotaru referenced Exhibit 22, Tab 2; of the submitted Book of Records. Herein, the Toronto Police Service Standards of Conduct was reviewed in which the Introduction states, "*Toronto Police Service members are held to a higher standard of conduct than other citizens. Not only is an expectation from the community, this standard is an expectation we place upon ourselves. This higher standard of behaviour is necessary to preserve the integrity of the Service*". And further that, "*the community expects TPS members to conduct themselves and discharge their duties with diligence, professionalism, and integrity...comply with and be seen to act within the spirit and letter of the law*"
16. In addressing the *seriousness of the misconduct*, Ms. Alexandra Ciobotaru submitted that PC Campoli's conduct falls on the very low end of the spectrum. That this type of conduct could have been dealt with by way of mediation had the complainant agreed or unit level discipline had the complaint come to the Service and not the OIPRD. And it is for this reason that the lowest penalty for the lowest type of misconduct is being jointly proposed.

## Prosecution Submissions Continued

17. The prosecutor added, that the purpose of a reprimand is not to penalize the officer financially, but to send a warning sign that the behaviour is not endorsed by the Service but it is at the very low end of the spectrum.
18. Ms. Alexandra Ciobotaru also noted, that PC Campoli did recognize and not deny that he said the f-word to Mr. John, but added that as defense counsel pointed out in his submissions, that context is relevant as well.
19. The importance of public trust is further addressed by the prosecutor with reference to Exhibit 22; the submitted Book of Records, at Tab 3 – Oath of Office. Herein, Ms. Alexandra Ciobotaru noted that PC Campoli signed and swore an Oath when he joined the TPS as being, *“I, solemnly swear/affirm that I will be loyal to Canada, that I will uphold the Constitution of Canada and that I will, to the best of my ability, discharge my duties as a Police Constable with the Toronto Police Service, faithfully, impartially and according to law”*.
20. Ms. Alexandra Ciobotaru then focused on PC Campoli’s employment history and submitted that, *“employment history is an important disposition in all cases. Employment history as a mitigating or aggravating consideration closely relates to the disposition consideration of rehabilitation potential.”* With that, she considered PC Campoli’s employment history mitigating given the potential to reform or rehabilitate the officer.
21. In support of the above submission, of positive employment history, Ms. Alexandra Ciobotaru pointed at Exhibit 22, Tab 4 and 5, in the Book of Records. Here Ms. Ciobotaru outlined PC Campoli’s complementary activities and Letters of Appreciation. The officer has 29 unrelated activities that have resulted in a positive documentation and 4 Letters of Appreciation from public organizations respectively.

22. Further, Ms. Alexandra Ciobotaru submitted that included, at Tab 6 of Exhibit 22, are performance appraisals for PC Campoli from 2013 to 2019. A review of his performance appraisals reveals common language used by a variety of supervisors to acknowledge PC Campoli and the type of work that he produces. Words that are used include, *“natural leader, hard working, valued member of the team, conscientious, and having a positive attitude with a good work ethic”*. The Prosecutor submitted that this officer’s employment history suggests that he will remain a productive officer demonstrating usefulness to the Service and is a mitigating factor for the proposed disposition.

23. In terms of *consistency of disposition*, Ms. Alexandra Ciobotaru submitted, that this represents one of the basic principles of the discipline process and flows from the idea that similar misconduct should be treated in a similar fashion, recognizing that no two cases are the same. However she added that this case is unique. And that in her research, it was difficult to find cases that resulted in a reprimand because usually more egregious behaviour comes before the tribunal and thus the penalties are more severe. This is not the case here.

24. The Prosecutor then submitted from Exhibit 23, Tab A, R. and Anthony-Cook, SCC 43, 2016 that Justice Moldaver of the S.C.C, stated that the BC Supreme Court justice who veered from the joint submission erred in that the judge applied a *“fitness of sentence”* test instead of using the appropriate standard test of whether a sentence brings *“the administration of justice into disrepute, or would otherwise be contrary to the public interest.”* The Prosecutor added, that in this case the joint position satisfies the public interest, although perhaps not Mr. John’s personal interest and does not bring the administration of these proceedings or Service into disrepute. And thus the joint position should be followed.

25. Ms. Alexandra Ciobotaru then further submitted the issues of *consistency of disposition*, in Exhibit 23, at Tab B, in Schofield and the Metropolitan Toronto Police, 1982 where it was stated, *“each case must be judged on the facts peculiar to it. Consistency in the discipline process is often the earmark of fairness. The penalty must be consistent with the facts, and consistent with similar cases that have been dealt with on earlier occasions.”*

26. Ms. Alexandra Ciobotaru also cited that earlier case law decisions contained in Exhibit 23, at Tab C - Pacitto and Toronto Police Service, 2004, Tab D - Horodynk and Toronto Police Service, 2007, Tab E – Culleton and Board of Inquiry, 1993, and Tab F - Police Services Act – Table of Dispositions which showed an appropriate range of penalty. She then summarized each of the historic cases, highlighting the similarities and differences, as they equate to PC Campoli's matter.
27. Ms. Alexandra Ciobotaru concluded her submission by indicating that the penalty crafted by herself and Mr. Butt is appropriate and within the range for conduct of this nature. Also she indicated that PC Campoli has already suffered from having this matter outstanding for quite some time.
28. As such, the prosecutor submitted that the appropriate disposition of a reprimand and tactical communications training would achieve the remedial purpose of discipline while satisfying the public interest that police are in control in dealing with members of the public. And that this disposition would not bring the reputation of the Service into disrepute.

### **Defence Counsel Submissions**

29. Mr. Butt began by reminding the Tribunal that the penalty position being proposed was a joint position, for a reprimand.
30. Counsel submitted that the Supreme Court of Canada has been very clear about joint submissions in criminal cases: they should be followed unless they would bring the administration of justice into disrepute or are otherwise contrary to the public interest. In support Mr. Butt directed the Tribunal to Exhibit 24, Tab 1 R. v. Cook, 2016 SCC 43 at paragraph 5.
31. Mr. Butt in describing the stringent test for a joint submission again referred to Exhibit 24, Tab 1, R. v. Cook, 2016 SCC 43, submitted that, the decision-maker should go along with the joint submission proposed by counsel unless it shows that *“the proper functioning of the justice system has broken down”*.

32. Counsel added, joint submissions are crucial to the efficient and effective functioning of the justice system. They allow parties to negotiate with certainty about the outcome of those negotiations, and they save time making extensive submissions in the hearing room.
33. Further counsel submitted, that the benefits of joint submissions apply with equal force and validity to discipline tribunal proceedings. Just like in criminal courts, there is a need for efficiency in proceedings, and certainty in negotiated outcomes to encourage negotiation. Adhering to joint submissions benefits the Tribunal and the public purse, because negotiation is far more efficient than litigation. Further, negotiated settlements are better for the parties themselves, because they are reached consensually, rather than imposed.
34. Mr. Butt continued his submission on the value of joint submissions by suggesting that senior and experienced counsel, representing opposing sides in this matter, have come together in this case for an agreed-upon penalty proposal. This negotiation was dynamic, where parties with opposed interests actually agreed and that this is a very strong indication that the proposed resolution effectively and correctly balances the interests represented by both the prosecution and defence. And thus that this position as a result should prevail.
35. Mr. Butt concluded his submissions on joint submissions, by submitting that the case law is clear. The Hearing Officer faced with a joint submission is not at liberty to impose whatever penalty he or she sees fit. That the Hearing Officer must go along with the joint submission, even if he or she would impose something different, as long as the joint submission is not so perverse as to bring the administration of justice into disrepute. He added that in this matter, the joint submission for a reprimand for one isolated f-bomb does not bring the administration of justice into disrepute.

## **Defence Counsel Submissions Continued**

36. Counsel in addressing how a reprimand does not bring justice into disrepute, submitted that the impugned conduct was one f-bomb. Counsel stated everybody swears and F-Bombs are abundant every night all over Netflix. He also stated that language is constantly evolving, and the f-bomb no longer has the universal societal condemnation it might once have had.
37. Mr. Butt, added, the practical reality was that f-bombs are dropped on every shift in every police facility by persons of both high and low rank. Policing involves dealing with dark subject matter daily. Dark language, and dark humour as a coping mechanism, is therefore far more prevalent than it might be in other work environments. In short, nobody familiar with policing would find an f-bomb either shocking or out of place.
38. Further Mr. Butt submitted that it would be hypocritical for a discipline Tribunal to express mock shock and outrage that one f-bomb was dropped, and impose a heavy penalty. This course of conduct would be counterproductive. It would only demean the discipline Tribunal in the eyes of its constituency, the TPS.
39. Counsel then submitted, that this case was a gun call. The situation was urgent, fluid, unknown, and potentially very dangerous. In such a heightened, tense situation it would, again, be hypocritical Monday morning quarterbacking for anyone, sitting safely in a Tribunal hearing room, to judge one isolated f-bomb harshly, without regard to this very difficult and potentially dangerous context.
40. Mr. Butt also submitted that the use of the f-bomb was not in the context of harassing or denigrating the complainant. It was not used to directly insult the complainant by calling him, for example, a f\*\*\*ing a\*\*hole. Instead it was used to make a legitimate investigative point.

## **Defence Counsel Submissions Continued**

41. Counsel submitted that the immoral taint of the f-word has by 2020 diminished to almost nothing. However respect for the public remains paramount. So, viewed through the lens of respect for the public, was this f-bomb problematic? Not at all. It was not used to demean the complainant directly. The complainant hates police and thus no doubt hates everything police might do or say to him. In short, no one was disrespected.
42. Mr. Butt added, the PC Campoli was acting in obvious good faith. He is a stellar member of the TPS, and indeed spoke candidly of another time he used an f-bomb in a tense situation; one that was later relayed in open court, attracting no criticism whatsoever. Further Counsel added, that if higher courts do not see f-bomb use like the present as problematic, lower Tribunals like this one should follow the lead of the higher courts.
43. Defense counsel then submitted, that discipline decisions must reflect community values. Would a member of the public, fully informed of all the points set out above – a community member who, incidentally, would routinely watch countless f-bombs on Netflix or HBO every night – be offended by what happened? No. So PC Campoli should not be punished harshly for what the reasonable member of the public would see as no big deal.
44. Mr. Butt also submitted, PC Campoli is already way over-punished by having to go through this ordeal of a hearing, having his career put on hold for years while this case was litigated, by having a serious discipline conviction for which he must now fill out a McNeil Report for years to come, and by continuing to have his career potentially derailed for many more years till his file can be cleared of this finding. All for one isolated f-bomb that should never have been before the Tribunal. The only correct response by this Tribunal is to note the reality that the single f-bomb should never have been here in the first place, and to impose the lowest possible penalty, which is a reprimand.

45. In commenting on the system of discipline, Mr. Butt submitted, that there exists serious structural flaw in the system. The OIPRD conducted a shoddy investigation and laid bogus charges of an unreasonable strip search, and illegal car search that had absolutely no merit. Further, these charges were advanced by a complainant who has not a shred of credibility. The serious allegations were rightly tossed by this Tribunal. But because the isolated f-bomb was caught up in the net of those other bogus allegations, it ended up in the Tribunal when it never should have been here. And because the Police Services Act is deficient in this regard, neither the prosecutor nor the Tribunal has any power to send the isolated and minor f-bomb matter back to the unit level where it obviously belongs.

46. Counsel added, thus as a result, PC Campoli, a dedicated and promising officer, gets a Tribunal penalty for something that doesn't come close to warranting one. That is a systemic result that is profoundly unfair to PC Campoli. The unfairness should not be compounded by giving a penalty higher than the minimum.

47. Mr. Butt concluded by submitting that, the cumulative effect is greater than the sum of its parts. So the case for a reprimand becomes even stronger when the points submitted are considered in totality, rather than in isolation.

### **Public Complainant Submissions**

48. No submissions were made by the Public Complainant.

### **Prosecution Reply:**

49. Nil

## **Analysis and Decision:**

50. In Williams and the Ontario Provincial Police, 1995, OCCPS the Commission identified three key elements a Hearing Officer must take into account when imposing a penalty. These are: the nature and seriousness of the misconduct; the ability to reform or rehabilitate the officer, and the damage to the reputation of the Police Force that could occur if the officer remained on the Force.
  
51. The Commission has also instructed that there are other factors to be considered in light of a particular misconduct which include the recognition of the seriousness of the misconduct, the employment record, the public interest in the administration of justice, general and specific deterrence and the need for consistency.
  
52. In this case Constable Campoli violated the public trust by not living up to his Oath of Office and refraining from use of profanity or abusive language in his interaction with a member of the public, as he had sworn to do.
  
53. He failed to meet the standard of conduct expected of him, and exercised poor judgement in his course of action by using the f-bomb in his interaction with a member of the public, who had placed a call for police assistance.
  
54. The public must have confidence in the ability of the Service to deal with any misconduct on the part of its members and as such, the public also has an interest in ensuring that Constable Campoli is held accountable for his actions. The public must be assured that Officers' can maintain professionalism and calm even in the face of provocation, frustration or adverse situations. Officers are held to a higher standard and thus the use of profanity, even on only one occasion, regardless of how common-place it may be in mainstream media and culture, as defence counsel suggested is unacceptable.
  
55. As noted in Carson and Pembroke Police Service, OCCPS, 2001 a guilty plea should be recognized as a mitigating factor. Constable Campoli did not plead guilty but rather was found guilty after a five day hearing.

56. All procedural fairness considerations have been addressed in this instance. He was provided the opportunity to make full answer and defence and has had the benefit of an experienced counsel throughout these proceedings.
57. I have reviewed the information from Constable Campoli's personnel file in Exhibit 22, at Tab 6. Constable Campoli has been recognized on approximately 29 occasions for his involvement in a number of significant arrests and investigations throughout his career. Those arrests involved the recovery of various firearms, as well as his assistance with in various Projects and drug investigations.
58. In Exhibit 22, at Tab 6, I reviewed Constable Campoli's annual performance appraisals dating from 2013 to 2019. In the appraisals, his supervisors variously commented that he was a hard working, valuable and conscientious.
59. How a person deals with challenging situations is often an indicator of their character. In the performance appraisals that were completed after this misconduct took place, his supervisors noted his ongoing positive attitude, and commitment to hard work.
60. Past behaviour is often an indication of what can be expected from a person in the future. Constable Campoli has a positive employment history and has been recognized many times for his contributions to community safety, often during challenging or dangerous circumstances.
61. As discussed in Andrews and Midland Police Service, 2002, OCCPS, an officer with a prior unblemished employment record should be provided with the opportunity to be rehabilitated. His positive employment record, the actions he has taken since this event, and the observations of those supervisors in a position to observe his behaviour, has demonstrated that he has the potential to reform or be rehabilitated.

## **Analysis and Decision Continued**

62. I am satisfied that deterrence specific to PC Campoli has been addressed having gone through this Tribunal process. In regards to general deterrence, the outcome of these proceedings will be published on TPS routine orders and a summary of this decision will be published on the TPS Intranet. Those documents are available to the entire Service membership and will reinforce the previous messaging in regards to the potential consequences for this type of misconduct.
63. The Commission discussed the need for fairness and consistency in the discipline process in Schofield and the Metropolitan Toronto Police, 1984, OCCPS, penalties must be consistent with prior similar cases. The Prosecutor provided a number of historical cases in support of the joint penalty position. The Prosecutor sought a penalty of a reprimand plus additional tactical communication training, and Counsel Mr. Butt joined Ms. Alexandra Ciobotaru on this position.
64. In reviewing all of the cases, it was apparent that even though many bore a number of similarities to others, there was no consistent penalty that was imposed. Each was considered on its own merits and penalties imposed were in a range that was dependent on all of the mitigating and aggravating factors specific to that case.
65. A penalty must be appropriate to the circumstances and a penalty imposed in one case may not be appropriate in another similar case based on the disposition factors that are present. In the matter before me, the misconduct of PC Campoli was serious and the circumstances surrounding his actions involved a member of the public.
66. His actions demonstrate poor judgement and are not in keeping with the expectations of a police officer. In this case, a penalty of a reprimand and training is appropriate. The penalty I am imposing is within the range of penalties for other cases involving similar misconduct.

67. In mitigation, PC Campoli, has contributed much to community safety which is reflected in his positive employment record.

68. Based on the information before me, I am sure he has learned much from these events but I am also confident that once this matter is behind him he will return to being a productive member of the Service.

69. I have reviewed the mitigating and aggravating factors and considered the submissions of defence counsel and the Service Prosecutor and I have determined a penalty.

**Penalty:**

Will the officer please stand?

The penalty in this matter imposed under 85 (7) (a) of the Police Services Act will be:

For PC Campoli is guilty of: use profane, abusive or insulting language or is otherwise uncivil to a member of the public, reprimand and that PC Campoli be further ordered under Section 85 (7) (b) of the Police Services Act to attend a tactical communication exposure session / training as instructed by Toronto Police College.



Riyaz J. Hussein  
Superintendent  
Hearing Officer

February 13, 2020

**Appendix 'A' - List of Exhibits 2/2019 - PC Adam Campoli (10129)**

Hearing Officer R. Hussein Letter of Delegation (**Exhibit 1**)

Materials pertaining to Defence – Pre-Hearing Motions (**Exhibit 2**)

1. Statement of Claim between John, Campoli, Sarasua and the Toronto Police Services Board; Ontario Superior Court of Justice 2018
2. Interview Summary
3. Special Investigation Unit – Status Search
4. CBC News release – Darren John has music promoter “always looking over my shoulder”
5. Spreadsheet – Date, Action and Notebook page number
6. Her Majesty the Queen and Darren Philip John, Ontario Court of Justice 2013
7. John v Nickels; Radjunovic; Collison World, Daaliwal; Peel Regional Police Services Board, Detective Dabge; OIPRD, McNeilly and Toronto Police Services Board, Detective Meirik, Sergeant Grover, Detective Elliot, Chief Blair and 4 Unknown officers; Ontario Superior Court of Justice, 2016
8. John and Richards; Bell Media Inc., Bell Media, Newstalk 1010; the Showgram and CFRB; Superior Court of Justice, Ontario, 2017
9. John and the Regional Municipality of Peel Police Services Board; Human Rights Tribunal of Ontario, 2019
10. Carbonneau and John, Ontario Superior Court of Justice, 2018
11. Article from the Washington Post

Prosecutor Ms. Alexandra Ciobotaru Letter of Designation (**Exhibit 3**)

Prosecution Materials Disc (**Exhibit 4**)

1. Recording made by the complainant 2014.02.04
2. Transcript complainant's recording 2014.02.04
3. Recording of PC Sarasua - OIPRD
4. Statement of PC Sarasua – OIPRD
5. Recording of PC Campoli - OIPRD
6. Statement of PC Campoli – OIPRD
7. Statement – Voicemail & Transcript of Mr. D. John – OIPRD
8. FIS Photographs x30
9. Complaint Form From OIPRD
10. Notes of Officer PC Campoli and Sarasua 2014.02.04
11. Statement of S/Sgt Schneider – Supervisor night 2014.02.04 - Transcript
12. Statement of S/Sgt Schneider – Supervisor night of 2014.02.04 – Recording
13. Statement of Mr. D. John – SIU – Transcript
14. Statement of Mr. D. John – SIU - Recording
15. TPS Policies and Procedures 01-02 Search of Persons
16. Criminal Record – Darren John

Prosecution Materials Disc (**Exhibit 5**)

1. 911 Call #1 - made by Mr. D. John
2. 911 Call #2- made by Mr. D. John

TD Insurance Letter 2013.06.19 (**Exhibit 6**)

TD Insurance Letter 2013.06.25 (**Exhibit 7**)

TD Insurance Letter 2013.09.05 (**Exhibit 8**)

Collision World Invoice 1334 (**Exhibit 9**)

Notice of Intention to Sell Articles –Collision World dated 2013.09.18 (**Exhibit 10**)

Email-Collision World to Juliet Bloom, TD Insurance Claim #014346471 – dated 2013.10.01. (**Exhibit 11**)

Collision World Letter dated 2013.11.14 (**Exhibit 12**)

Email Juliet Bloom TD Insurance to Collision World - Claim #014346471 – dated 2013.10.23 and 2013.11.13 (**Exhibit 13**)

Emails between Juliet Bloom TD Insurance and Collision World – Claim #014346471 – dated 2013.11.28, 2013.11.29, 2013.12.09 (**Exhibit 14**)

Transcript of 911 Calls made on 2014.02.04 by Mr. D. John–Call #1 and #2 (**Exhibit 15**)

Print out of links and screen shots of music videos (**Exhibit 16**)

Booking video with audio (**Exhibit 17**)

CPIC return on Public Complainant DJ (**Exhibit 18**)

Toronto Police Service - Property Items Report TP2014—1469409 (**exhibit 19**)

Toronto Police Service - Search of Person - Level 3 report (**exhibit 20**)

Prosecution of Authorities (**Exhibit 21**)

Jacobs v Ottawa Police Service, Court of Appeal for Ontario, 2016 (Tab A)

Precious and Hamilton Police Service, OCPC, 2002 (Tab B)

Faryna v. Chorny, British Columbia Court of Appeal, 1951 (Tab C)

F.H and McDougall, British Columbia Court of Appeal 2008 (Tab D)

Prosecution Book of Records (**Exhibit 22**)

Dispositions-2017 Ed., Ontario police Services Act by Ceysens & Childs (Tab 1)

Toronto Police Service Standards of Conduct, Introduction, Chief Blair (Tab 2)

Toronto Police Service Oath of Office-PC Campoli (Tab 3)

Constable Campoli #10129–Complimentary Activity/Conduct Issues Report-TPS 950 (Tab 4)

Constable Campoli #10129 – Community Letters 2008,10,13 (Tab 5)

Constable Campoli #10129 – Performance Appraisals (Tab 6)

**Prosecution Book of Authorities (Exhibit 23)**

R. and Anthony-Cook, SCC 43, 2016 (Tab A)

Schofield and Metropolitan Toronto Police, 1984, OCCPS, (Tab B)

Pacitto and Toronto Police Service, 2004, (Tab C)

Horodynk and Toronto Police Service, 2007, (Tab D)

Culleton and Board of Inquiry, 1993, (Tab E)

Police Services Act – Table of Dispositions, (Tab F)

**Defence Electronic Submissions (Exhibit 24)**