



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  
TORONTO POLICE SERVICE  
AND CONSTABLE ANTONIO SAFFIOTI (10186)

Charge: Neglect of Duty

PENALTY DECISION

Hearing Officer: Inspector Lauren Pogue, Toronto Police Service

Prosecutor: A/Inspector Josh Jamshidi, Toronto Police Service

Defence Counsel: Mr. Gary Clewley

Case Number: 49.2018

Hearing Dates: 2019.09.24

Decision Date: 2020.02.28

Before commencing my decision on penalty and sentencing in this matter, I would like to thank Mr. Gary Clewley, Defence Counsel, and Acting Inspector Josh Jamshidi, 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 Antonio Saffioti (PC Saffioti) #10186 commenced his employment with the Toronto Police Service (TPS) in 2008. PC Saffioti presently holds the rank of First Class Constable and assigned to 14 Division, Uniform Duties.

### **Allegations of Misconduct**

2. Constable Antonio Saffioti #10186, being a member of the Toronto Police Service, you are alleged to have committed misconduct in that you omitted to make a necessary record, contrary to Section 2(I) (c) (viii) of the Schedule Code of Conduct of Ontario Regulation 268/10 and therefore, contrary to Section 80(I) (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, attached to number 14 Division, you were assigned to uniform duties.

On Tuesday, October 30<sup>th</sup>, 2016 you investigated M.S. in the area of Dundas Street West and Spadina Avenue, Toronto. You arrested M.S. for a drug related offence. As a result of your investigation you subsequently released M.S. unconditionally.

You omitted making any notations in your memorandum book of this arrest/investigation.

Toronto Police Service Procedure 13-17 titled “Notes and Reports” indicates your requirements to maintain and record notes of arrests, investigations and significant events.

In so doing, you committed misconduct in that you did omit to make a necessary entry in record.

### **Plea**

3. On September 24, 2019 Constable Antonio Saffioti (10186), pleaded guilty and was found guilty of Neglect of Duty, 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(1) (f) of the Police Services Act (PSA).

For Neglect of Duty in that PC Saffioti is guilty of: did omit to make necessary record, a forfeiture of three days or 24 hours off. 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. Clewley represented PC Saffioti and A/Inspector Jamshidi

represented the Toronto Police Service.

### **Agreed Statement of Facts (ASoF)**

7. The facts of this matter are substantially agreed upon by the parties. The ASoF, filed as exhibit 5, state:

At the time of these events PC Antonio SAFFIOTI #10186 performed his duties in a uniform capacity assigned to 14 Division Community Response Unit.

On October 30<sup>th</sup>, 2016, PC SAFFIOTI and his partner were operating their police bicycles going southbound on Spadina Avenue at Dundas Street West in the City of Toronto.

They described this area as being associated with a “high level of illegal drug activity”. PC SAFFIOTI observed the Complainant on the Northwest corner of Spadina and Dundas conducting what he believed to be a “hand to hand” drug transaction.

As a result, PC Saffioti and his partner approached and arrested the Complainant for possession of crack (cocaine). They handcuffed the Complainant and did not use more force than was necessary to control his arms. PC Saffioti advised the Complainant regarding his Rights to Counsel.

PC Saffioti conducted a search of the backpack belonging to the Complainant, along with his pant and jacket pockets. PC Saffioti removed items from the Complainant’s backpack and placed them on the ground. This search did not locate any evidence. The Complainant was released unconditionally.

There was another male with the complainant who was simultaneously investigated by PC Saffioti’s partner. A Provincial Offences Ticket (POT) was subsequently issued to that male for having open liquor. PC Saffioti’s partner made notes in his memorandum book and further made notes on the back of his

POT.

The Complainant sought Counsel and complained to the Office of the Independent Police Review Director (OIPRD) about the officers in relation to this arrest, search and release. The complainant stated that his laptop was damaged, his money was misplaced and that he was embarrassed by the officers; these allegations were all unsubstantiated.

OIPRD investigators concluded that the arrest and search of the Complainant was lawful, however, PC Saffioti failed to create the appropriate record of the incident; specifically, within his memorandum book. PC Saffioti cooperated with the OIPRD investigators and stated that this was an “oversight” on his part.

Procedure 13-17 "*Memorandum Books and Reports*" states that a member when required to maintain a memorandum book "*shall record all pertinent facts of arrests, investigations and significant events.*"

Notwithstanding that, PC Saffioti failed to make the necessary entries in his memorandum book notes as required and therefore breaching Procedure 13-17, it is not alleged that PC Saffioti's failure to make notes in this event was intended for any nefarious purpose or had any impact on any legal cases.

### **Positions on Penalty**

8. The positions on penalty are in congruence. Defence and prosecution agree by joint submission to a forfeiture of three days or 24 hours off. My reasons for this are as follows. A summary of A/Inspector Jamshidi's and Mr. Clewley's submissions, in support of this position, follows.

### **Witnesses**

9. No witnesses were called by the prosecution or the defence.

## Submissions

### Prosecution Submissions

10. The Prosecutor - A/Inspector Jamshidi began his submissions by entering a Book of Records (Exhibit 7), and a Book of Authorities (Exhibit 8).
11. A/Inspector Jamshidi submitted that the facts in this case are straightforward, the misconduct is clear and the disposition proposed is consistent with previous cases, satisfying the principals of our system of discipline.
12. He 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. A/Inspector Jamshidi brought to my attention Exhibit 8, Tab 1 – Konkle and Niagara Police Service, 1997 that speaks to the issue of good character. “*Good character in a police officer is essential to both the public’s trust in the officer, and to a police services ability to utilize that officer. The public has the right to trust that its police officers are honest and truthful and that, absent extenuating circumstances, they will not be officers any longer if they breach this trust.*”
14. A/Inspector Jamshidi highlighted that there are fifteen considerations governing the determination of an appropriate disposition and they can be found in the 2017 *Ontario Police Services Act*, by Ceysens and Childs; these principals were submitted at Tab 1, in Exhibit 7. The prosecution considered fully, all 15 of these doctrines and distinguished the following as particularly relevant in the submissions to penalty in this matter.
15. A/Inspector Jamshidi referenced Exhibit 8, Tab G – Knox and Toronto Police Service, 2009 submitting that PC Saffioti’s actions have implications with the *public trust* we strive to uphold. He reiterated that *public trust* is integral to the policing

profession and all actions taken by police officers must withstand public scrutiny to maintain that trust. *“Note taking is a requirement that is fundamental to the policing profession. Failure to make requisite memorandum book entries can compromise the operation of our Service, thereby undermining public trust and confidence.”*

16. A/Inspector Jamshidi further addressed the importance of *public trust* with reference to Exhibit 7, Tab 2; of the submitted Book of Records. The Toronto Police Service Standards of Conduct was reviewed in which the Foreword from the Chief states, *“I want to impress upon you the necessity of maintaining the Public’s trust and grave implications for all of us if it is lost. Actions by members that break the law and violate the public trust diminish the public’s perception of the professionalism of the police and tarnish the reputation of the Service”*.

17. In further addressing *public trust*, A/Inspector Jamshidi referenced Exhibit 7, Tab 3; 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 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”*. The integrity of the Service is always under scrutiny and will continue when officers are found to be contravening our own procedures.

18. In addressing the *seriousness of the misconduct*, A/Inspector Jamshidi noted that PC Saffioti’s failure to make appropriate notes is serious in nature.

19. In Exhibit 7 in the submitted Book of Records, at Tab 4, Oath of Office, A/Inspector Jamshidi brought attention to PC Saffioti’s signed and sworn Oath where he swore to discharge his duties as a constable faithfully, impartially and according to law.

20. A/Inspector Jamshidi quoted from Exhibit 7, Tab 5, Service Procedure 13-17: Memorandum Books and Reports, *“Member, when required to maintain a memorandum book shall record all the pertinent facts of arrests, investigations and significant events”*

## Prosecution Submissions Continued

21. The Prosecutor then submitted that, on January 19<sup>th</sup>, 2018 the Toronto Police Service as part of its transformational change introduced new Core Values located in Exhibit 7, at Tab 6 of the Book of Records. He submitted; PC Saffioti's actions directly relate to two of those values:

a) *Do the right thing*: by acting professionally, with integrity, and without prejudice, even in the most challenging circumstances, when no one is watching, and on and off duty; holding others accountable to the same standards, challenging inappropriate behaviours; and asking ourselves, "*Have I lived up to my word and values?*"

b) *Reflect and Grow*: by recognizing that we do not have all the answers; seeking and acting on input and feedback from the communities and our colleagues; acknowledging and learning from our mistakes and successes; and asking ourselves, "*What else can I do to improve?*"

22. A/Inspector Jamshidi added, that while PC Saffioti had not lived up to this word or values in *Do the Right Thing*, he has acknowledged his mistake by pleading guilty and is seeking to move past this incident to improve himself, and learn from his mistakes in keeping with the core value of *Reflect and Grow*.

23. On the principle of recognition of the *seriousness of misconduct*, the Prosecutor referred to Grbich and Aylmer Police Service 2002, OCCPS from Exhibit 8, Tab B. The Prosecutor drew attention to the decision Williams and the Ontario Provincial Police, 1995, OCCPS where 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 service that could occur if the officer remained an employee.

24. The Prosecutor, also highlighted from the same decision, other factors the

Commission found to be relevant, mitigating or aggravating to the penalty which include; employment history and experience, recognition of the seriousness of the transgression and, handicap or other relevant personal circumstances.

25. In assessing PC Saffioti's recognition of the *seriousness of the misconduct*, A/Inspector Jamshidi, asked that I consider PC Saffioti's post conduct, and in particular his early guilty plea in this tribunal.
26. The Prosecutor submitted PC Saffioti's guilty plea demonstrates both remorse and an acceptance of responsibility for his misconduct. He has demonstrated that he is willing to face the consequences and to continue to be a productive member of the Service. In support, the Prosecutor drew attention to Exhibit 8, Tab C - Carson and Pembroke Police Service, 2001, OCCPS which stated, "*we have no doubt that a guilty plea should be recognized as a mitigating factor and taken into account along with other factors in determining an appropriate penalty.*"
27. Included in the Book of Records at Exhibit 7, Tab 1, are pages 350 to 354 of the 2017 *Ontario Police Services Act*, by Ceysens and Childs, which guides us on how to assess an officer's employment history in association with recognition of the seriousness of the misconduct and potential to rehabilitate. A/Inspector Jamshidi focused on Factor 7, Employment History, wherein the commentary cites several Commission cases and in summary makes the following determinations with respect to this factor, "*Employment history is an important disposition factor in all cases. Employment history as a mitigating or aggravating consideration closely relates to the disposition consideration of rehabilitation potential,*" and "*Employment history will aggravate a disposition in cases that involve a number of recent findings of misconduct or a number of similar findings of misconduct or a history or serious misconduct.*"
28. In support of the above submission of *positive employment history*, A/Inspector Jamshidi pointed at Exhibit 7, Tab 7, and 8, in the Book of Records. Here he outlined PC Saffioti's complementary activities versus his conduct issue. The officer has 32 complimentary activities that have resulted in a positive

documentation and or letters of appreciation, the most recent dated April 18<sup>th</sup>, 2018. PC Saffioti was also presented a “Public Hero Award” for his extraordinary dedication and professionalism within the Toronto Police Service after being nominated by a member of the Kensington Market Community.

29. Further, A/Inspector Jamshidi submitted that included at Tab 8 of Exhibit 7 are performance appraisals for PC Saffioti from 2014 to 2018. A review of his performance appraisals speaks of a hardworking, motivated officer who meets and exceeds standards. In his last evaluation, he is described by his Unit Commander at 14 Division as a *“dedicated and extremely diligent officer who operates at the highest level and is an asset to the unit.”*
30. A/Inspector Jamshidi concluded by referring to PC Saffioti’s Internal Resume in Tab 9 of Exhibit 7 stating he is an experienced officer who has worked in many areas of the police service and has had many training courses. He has had no recent misconduct issues and therefore consider his *positive employment history* as mitigating.
31. In regards to *the potential to reform or rehabilitate*, A/Inspector Jamshidi drew attention to Exhibit 8, Tab B in Grbich and Aylmer, 2002, OCCPS. The Commission noted that, *“every attempt should be made to consider whether or not rehabilitation is possible. A police service and the community in which it is situated makes a significant investment in each police officer. Unless the offence is egregious and unmitigated, the opportunity to reform must be a key consideration.”*
32. The Prosecutor then submitted, that PC Saffioti had dealt with his allegations at the Tribunal by way of a guilty plea and has taken positive steps toward rehabilitation. PC Saffioti has agreed to complete the *“Note Taking”* course offered by the Canadian Police Knowledge Network (CPKN), and has further acknowledged his actions in his statement to investigators, not denying his responsibility.

33. In terms of *consistency of disposition*, A/Inspector Jamshidi cited from Exhibit 8 Tab E, in Buckle and the Ontario Provincial Police, 2005, OCCPS the principle set out in Schofield and the Toronto Police Service, 1982 at Tab F, where it was stated, *“Consistency in the discipline process is often the earmark of fairness.”*
34. A/Inspector Jamshidi also cited that earlier case law decisions contained in Exhibit 8 at Tab G - Knox and Toronto Police Service, 2009, Tab H - Potter and Ontario Provincial Police Service, 2017, Tab I - Corkill and Toronto Police Service, 2011, and Tab J - Lloyd and London Police Service which showed an appropriate range of penalty. He then summarized each of the historic cases, highlighting the distinguishing similarities and differences, as they equate to PC Saffioti’s matter.
35. The Prosecutor submitted that in the area of *specific and general deterrence*, that the correlation between penalty and deterrents, both general and specific, were cited from Exhibit 8, Tab D, in Andrews and Midland Police Service, 2002, OCCPS. Here the Commission stated, *“He was also correct that the penalties imposed for misconduct must be strong enough to send a clear message to other officers that such conduct or any conduct of this nature will not be tolerated”* and further that, *“the penalty must ensure public confidence in the police force.”* He added that the penalty proposed does just that, it highlights the importance of note taking, sending a strong message of deterrence that this type of misconduct is not accepted or tolerated.
36. A/ Inspector Jamshidi referred to Tab K, of Exhibit 8, in Zayack and Toronto Police Service, 2006 where it states that, *“Minimal penalties tend to provide minimal general deterrence.”* He added that the penalty proposed is not minimal and will impact the officer financially, submitting that general deterrence is achieved.
37. The Prosecutor concluded by summarizing both the aggravating and mitigating factors, as submitted.

38. A/Inspector Jamshidi submitted, the *aggravating factors* included, the misconduct of PC Saffioti was serious, and compromised public trust. This matter involved the breach of a Service Procedure and further that the public expects police officers to be held to a higher standard of conduct.
39. The Prosecutor articulated the *mitigating factors*, are PC Saffioti's positive employment record, and that he acknowledged the misconduct and accepted responsibility for his actions. PC Saffioti showed willingness to participate in additional training to address the misconduct and was remorseful, pleading guilty before this tribunal. This is all indicative of an individual who has demonstrated his willingness to face the consequences and continue to be a productive member of the Service.
40. A/Inspector Jamshidi concluded his submission by indicating that the proposed penalty is consistent and reasonable. It sends a strong message to PC Saffioti, other Service members and the community that this type of non-compliance will not be tolerated. Lastly, the penalty does not offend the Office of the Chief of Police or the organizational goal of impressing upon the membership the importance of undertaking good note taking practices.
41. As such, the Prosecutor submitted that the appropriate disposition was a forfeiture of three days or 24 hours off.

### **Defence Counsel Submissions**

42. Defence Counsel commenced by agreeing that the prosecutions' submissions were fair. PC Saffioti has had a spectacular career and in his evaluations he is described as the model and standard by many supervisors.
43. Mr. Clewley referred to Exhibit 7, Tab 7, Information from Personnel File (TPS950) and referred to the List of Commendations and reports of PC Saffioti's excellent work. Counsel submitted that the officer has been recognized on numerous occasions for his diligent work in arresting those responsible for violent

crimes, including murder, bank robbery and firearms offences placing his own wellbeing at risk on a repeated basis in an effort to improve community safety.

44. Counsel submitted that PC Saffioti works in a challenging area of the city dealing with those engaged in the drug trade and other violent crimes. PC Saffioti was nominated by a Member of Parliament and awarded a Public Hero Award for his extraordinary dedication and professionalism in the Kensington Market community where he is a fixture and highly regarded officer. His work in the community was commended in April 2018.

45. Mr Clewley brought to my attention Exhibit 7, Tab 8, Uniform Performance Appraisal noting all comments from the officer's supervisors are positive.

46. Mr. Clewley stated that this misconduct is entirely out of character for PC Saffioti. The officer acknowledged his wrong doing from the beginning, regrets it and will do better in the future. He further added that there is no reason to think Mr. Saffioti will be back in this tribunal. Allegations made to the OIPRD were unsubstantiated and Mr. Saffioti wants to get back to his duties and continue to be an excellent officer and contributing member of the Service.

47. Counsel submitted that the penalty suggested is well within the range and that he joins Prosecutor, A/Inspector Jamshidi in recommending a forfeiture of three days or 24 hours.

**Prosecution Reply:**

48. Nil

## **Analysis and Decision:**

49. In Williams and the Ontario Provincial Police, 1995, OCCPS the Commission identified three key elements a Hearing Officer must consider 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
50. The Commission also instructed that there are other factors to consider in light of the 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.
51. Police officers cannot perform their duties without the public's trust and support. In this case, Constable Saffioti violated the public's trust by failing to follow a Service Procedure and not living up to his Oath of Office as he had sworn to do. He failed to meet the standard of conduct expected of him when he did not complete appropriate memorandum book notes.
52. 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 has an interest in ensuring that Constable Saffioti is held accountable for his actions.
53. It is clear that Constable Saffioti has recognized the seriousness of the misconduct. He has entered a guilty plea in the Tribunal, and taken additional training on proper note taking. As noted in Carson and Pembroke Police Service, OCCPS, 2001, a guilty plea should be recognized as a mitigating factor. Constable Saffioti has not tried to shift the blame on others for his actions and has accepted full responsibility for them.

54. All procedural fairness considerations have been addressed. Constable Saffioti was provided the opportunity to make full answer and defence and has had the benefit of an experienced Counsel throughout these proceedings.
55. I have reviewed the information from Constable Saffioti's personnel file in Exhibit 7, at Tab 7. Constable Saffioti was recognized on approximately 32 occasions throughout his career. These include a number of significant arrests for Murder, Robbery and other serious and violent crimes resulting in the seizure of firearms and significant quantities of narcotics in the area he patrols. He has been praised numerous times for his professionalism, compassion and contributions to the community.
56. The source documents in Exhibit 7, at Tab 7, for the awards Constable Saffioti has received provided further details into contributions that go beyond his divisional duties. These include a significant investigation he participated in which led to a number of arrests for serious drug and firearms offences. Further, Constable Saffioti received a letter from Member of Parliament Dr. Geng Tan, dated April 19<sup>th</sup>, 2018 praising his extraordinary dedication and professionalism when given a Public Hero Award for his community involvement with the homeless and individuals with drug dependency and mental health challenges.
57. In Exhibit 7, at Tab 8, I reviewed Constable Saffioti's annual performance appraisals dating from January 2015 to January 2019. In the summary and comments, his supervisors have called him mature, responsible, and well liked by his peers. He is extremely hard working and diligent, treating everyone with fairness and respect. His Supervisors further described him as the consummate community officer and a template of what other officers should strive for while helping to bridge relationships between police and community.

58. How a person deals with challenging situations is often an indicator of their character. Four of the performance appraisals were completed after this misconduct occurred and Constable Saffioti's supervisors noted his continued excellence in the performance of his duties.
59. Past performance is often a predictor of future behaviour. Constable Saffioti has a positive employment history and was acknowledged many times for his contributions and community partnerships to create safe communities. Constable Saffioti has accepted responsibility for his actions and entered a guilty plea in this Tribunal.
60. 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. PC Saffioti has the potential to reform or be rehabilitated. This is apparent in his actions taken since this event occurred, his overall positive employment record, and by the observations of his direct supervisors in a position to observe his daily behaviour.
61. I am satisfied that deterrence specific to PC Saffioti has been addressed through his acceptance of responsibility, his guilty plea and willingness to accept a penalty. In regards to general deterrence, the result of these proceedings will be published on TPS Routine Orders and a summary will be published on the TPS Service Intranet. These documents are available for the entire Service membership, emphasizing the previous messaging in regards to potential consequences for this type of misconduct.
62. 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 forfeiture of three days or 24 hours off and Counsel Mr. Clewley joined A/Inspector Jamshidi on this position.

63. 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.
64. 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 Saffioti was serious and the circumstances surrounding his actions in poor note keeping were not in keeping with the expectations of a police officer. In this case, a penalty of multiple days or hours is appropriate. The penalty I am imposing is within the range of penalties for other cases involving similar misconduct.
65. In mitigation, PC Saffioti has contributed greatly to community safety, which is reflected in his positive employment record
66. PC Saffioti has taken positive steps to address his misconduct, having taken additional training, on proper note taking. Based on the information before me, I am confident that once this matter is behind him he will return to being a productive member of the Service.
67. 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**

The penalty in this matter imposed under Section 85 (1) (f) of the Police Services Act will be:

For Neglect of Duty in that PC Saffioti is guilty of: did omit to make necessary record, a forfeiture of three days or 24 hours off.

A handwritten signature in cursive script that reads "Lauren Pogue".

Lauren Pogue  
Inspector  
Hearing Officer

February 28th, 2020

## **Appendix 'A'**

### **List of Exhibits 09/2019 - PC Anthony Saffioti (10186)**

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

Hearing Officer R. Hussein Letter of Delegation **(Exhibit 2)**

Hearing Officer M. Barsky Letter of Delegation **(Exhibit 3)**

Hearing Officer L. Pogue Letter of Delegation **(Exhibit 4)**

Prosecutor J. Jamshidi Letter of Designation **(Exhibit 5)**

Agreed Statement of Facts **(Exhibit 6)**

Prosecution Book of Records **(Exhibit 7)**

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

Toronto Police Service Standards of Conduct, Forward Sect., Chief Blair (Tab 2)

Toronto Police Service Standards of Conduct, Introduction, Chief Blair (Tab 3)

Toronto Police Service Oath of Office - PC Saffioti (Tab 4)

Toronto Police Service – Procedure 13-17 Notes and Reports (Tab 5)

Toronto Police Service – Core Values (Tab 6)

Constable Saffioti #10186-Activity Report /Awards Recommendations -TPS 950 (Tab 7)

Constable Saffioti #10186– Performance Appraisals (Tab 8)

Constable Saffioti #10186 – Internal Resume (Tab 9)

Prosecution Book of Authorities **(Exhibit 8)**

Bright, Konkle and the Niagara Board of Inquiry, OCPC, 1997-01 (Tab A)

Christian and Grbich and Aylmer Police Service, OCCPS, 2002 (Tab B)

Carson and Pembroke Police Service, OCCPS, 2001 (Tab C)

Andrews and Midland Police Service, 2002, OCCPS (Tab D)

Buckle and Ontario Provincial Police Service, OCCPS, 2005, (Tab E)

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

Knox and Toronto Police Service, 32/2008, 2009, (Tab G)

Potter and Ontario Provincial Police Service, OCCPS, 2017, (Tab H)

Corkill and Toronto Police Service, 12/2010, 2011 (Tab I)

Lloyd and London Police Service, OCPC, 1998 (Tab J)

Zayack and Toronto Police Service, 14/2006, 2006 (Tab K)