



1 prepared this chart that there has been no  
2 editing whatsoever?

U/T

3 MS. BROWN: Yes, I will check that.

4 371. MR. COHEN: Okay. Thank you.

5  
6 BY MR. COHEN:

7 372. Q. And the other thing I would just  
8 like to check, and maybe you would know this, sir,  
9 is, do these comments all come from different  
10 individuals or is it possible that a number of them  
11 came from one individual?

12 A. I don't, I'm not even sure that they  
13 track specifically who the individuals are that are  
14 submitting the comments. So the answer to that is I  
15 don't know whether they are from one, many or all  
16 individual comments.

17 373. Q. Are you familiar with a gentleman by  
18 the name of Rami Tobello, R-A-M-Y T-O-B-E-L-L-O?

19 A. I'm familiar with him, yes.

20 374. Q. Okay.

21 MS. BROWN: R-A-M-I, sorry. Just for  
22 the record.

23  
24 BY MR. COHEN:

25 375. Q. So Rami Tobello ---



1 MS. BROWN: I just want the record to be  
2 correct.

3 376. MR. COHEN: I appreciate that.

4  
5 BY MR. COHEN:

6 377. Q. How do you know that individual or  
7 what do you know about that individual as it  
8 pertains to sign issues in the City?

9 A. Well, they only pertain to sign  
10 issues. That's my only knowledge of him. I first  
11 made his acquaintance back in the fall of 2006 when  
12 we were receiving Letters of Complaint from him  
13 representing a group called ---

14 378. Q. He has got a website.

15 A. Bear with me. It's before that. I  
16 could be reminded, but I'll come back to it in a  
17 moment. Eventually it broke off. He started this  
18 website calling himself illegalsign.ca.

19 MS. BROWN: Public Space Committee.

20 THE DEPONENT: Public Outdoor, Public  
21 Space ---

22 MS. BROWN: Public Space Committee.

23 THE DEPONENT: Committee, yes, thank  
24 you. So initially it was by way of this  
25 Public Space Committee, and the complaint



letters that were coming to my staff asking them to investigate sign installations.

BY MR. COHEN:

379. Q. And do you know when that first ---

A. Yes, as I said, it was in the fall of 2006.

380. Q. Okay.

A. So when I received notice of the types of complaints, the number of complaints of what he asking, I felt a need to meet with him and to try and get to the bottom of what his real complaint was. I did convene a meeting where he came on his own and I had a meeting with the Director of MLS and the Director of Planning at the time and some staff. And the purpose of the meeting was to try and understand what his issues were so that we could better address them if deemed appropriate.

He described for the group his intent and his intent was very clear that his concern about signage and the proliferation of signage across the City and the illegal or illegality and that he wanted action was made very clear.

So I took his comments very seriously. I



1 assured him that he could continue to provide  
2 information to the City, namely to me directly  
3 rather than every member of my staff individually.  
4 I felt he was cross purposing. He was sending it to  
5 different people and we had a lot of work being done  
6 without much coordination.

7 So the objective was, or I invited him to  
8 start focusing his attention by letter to me and  
9 then I would in turn determine whether or not it was  
10 valid and whether or not it was MLS that should be  
11 dealing with it, as we described earlier their role.

12 381. Q. Yes.

13 A. Versus the Building Permit Toronto  
14 Building role. And then he began to send many, many  
15 letters in, which I assigned to staff to distribute  
16 accordingly and action to be taken where  
17 appropriate.

18 So in essence I confirmed with him that I  
19 took his complaint seriously as I would with any  
20 member of the public and that I would make decisions  
21 that I felt were appropriate to the complaint and  
22 act accordingly. And, in fact, I confirmed for him  
23 that I would not be getting back to him on every  
24 single complaint, nor have I.

25 382. Q. Okay. And in terms of volume are we



1 talking about dozens of complaints?

2 A. I would argue that there are more  
3 than dozens, yes.

4 383. Q. Okay.

5 A. There are hundreds.

6 384. Q. Hundreds of complaints?

7 A. Mhmm.

8 385. Q. So this has become his mission to a  
9 certain degree? I mean you see it as an individual  
10 who is quite eager for sign proliferation to cease  
11 and he has an agenda to, his own agenda?

12 A. Well, I can't speak to his agenda or  
13 mission, but my understanding of his way is he does  
14 attend Community Council meetings, he does write  
15 lots of letters to me and to MLS, he does lobby a  
16 number of Councillors, or lobby, maybe not a  
17 lobbyist, but discuss with them his issues. He  
18 deposes at many of these sign variance application  
19 hearings.

20 386. Q. So he's active?

21 A. He's very active. He has a website  
22 which he calls illegalsign.ca. He pulls permit  
23 files through FOI requests, Freedom of Information  
24 requests. He often posts on his website notes out  
25 of my files, out of the City's files. He talks



2 very vocal in his opinions and he continues to do  
3 so.

4 387. Q. All right. Well, in terms of this  
5 document at Exhibit "K".

6 A. Mhmm.

7 388. Q. Do you know whether Mr. Tobello is  
8 responsible, either directly or indirectly, for a  
9 number of these comments?

10 A. I wouldn't know.

11 389. MR. COHEN: Is there any way, Council,  
12 you could check to determine whether Mr.  
13 Tobello was the author of a significant  
14 portion? I don't need exact details, but  
15 if it turned out, for example, that he  
16 wrote, you know, 50 percent of these, I  
17 would like just sort of a ballpark. I  
18 guess if you ask the person who has fielded  
19 the comments if they could determine to  
20 what extent Mr. Tobello or people under Mr.  
21 Tobello were the authors, just generally,  
22 Counsel.

23 MS. BROWN: Yes, I'm prepared to ask  
24 that question. It's my understanding that  
25 they're probably not because they met

U/T



separately with public interest groups and stakeholder groups and that these are just, it's my understanding, comments from the public at large, but I will double check.

390. MR. COHEN: Thank you. I'm almost done here.

THE DEPONENT: That's all right. No hurry.

BY MR. COHEN:

391. Q. Okay. So if you could turn to paragraph 35 of your Affidavit. I think we identified what the -- you talked about:

"...Upon being inundated with such complaints commencing in or around the fall of 2006..."

Is that essentially what you were just describing?

A. Yes, I was.

392. Q. Okay. And prior to that, could you give me a rough idea of how often the City had to use enforcement measures to actually take down signs prior to getting all these complaints from Mr. Tobello in the fall of 2006, or was it a pretty rare situation where the City would actually compel someone to take down their sign or the City would