

May 20, 2021

To the Mayor and Councillors

Grand River Cab Inc. is moving forward by currently operating 2 vehicles with the expectation that the other 3 vehicles will be needed as business regrows again. Grand River Cab's drivers would like to thank the Council for allowing the rate changes to be done quickly and in a fair and equitable manner. GRC has paid for a licensing tribunal on March 15, 2021 as per taxi bylaw 53-09.

Enclosed please find copies of four letters GRC received over the past 18 months from two individual staff members that effectively took our stakeholder rights away from us to communicate with staff and council with threats and allegations that GRC believes are unsubstantiated. GRC believes that councillors and the Mayor may have been aware of the proposed letters but not the contents nor the right reasons for these letters because GRC has information that Council was directed by a senior staff member not to have any contact with GRC due to a pending lawsuit. The letters sent by senior staff suggest a pending lawsuit by the County of Brant, if GRC does not agree to the conditions of those letters, not GRC suing the County. GRC feels past payment of STP services were not met according to council approval of a program being paid under the taxi bylaw 53-09 rates structure as requested of the other 50% which was fair market value not under market value as GRC was paid. GRC feels these letters were inappropriate and staff did not follow due process according to the taxi bylaw 53-09 which lays out the procedure for a stakeholder, staff and council who may believe a different position is appropriate for the taxi industry, this is why a licensing tribunal is supposed to be already named and available to make quick and unbiased decisions.

Taxis are private companies servicing the County of Brant's transportation needs and they are supposed to operate for profit but under County regulations. It is imperative the taxi industry has access to staff to allow a voice for concerns that financially affects them and to make sure the County of Brant does not undermine this industry as it would not be beneficial to our large geographical communities that need fair and equitable and reliable transportation.

Council directed staff in 2019 to update the taxi bylaw 53-09 with a paid consultant for this review, however staff has taken it upon themselves to contact vehicle for hire competitors such as Uber, Lyft etc and thus, GRC believes staff is trying to deregulate the taxi industry and GRC is totally against any new vehicle for hire bylaw as it invites more competition and does not correct the existing bylaw that Council ordered and paid for in 2019. It is hard enough to compete with the other stakeholder and their associated brokerages that surround the County of Brant as well as the County's new transit system. Taxi rates are regulated by the County so they can be stable and sustainable, citizens are not overcharged, and are able to feel safe and have a reliable service.

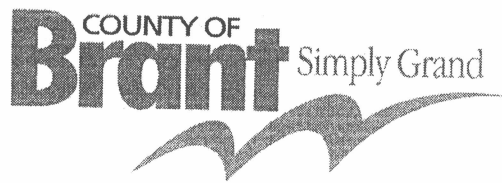
A consultants report was completed but never presented to council as of the writing of this letter. Staff subsequently requested the paid consultant to revise his first report. Council has not been presented with either the first report or the revised second report that GRC believes was

completed in December 2020. Can council look into these reports so the antiquated bylaw can be updated with a new fairer taxi bylaw and not a vehicle for hire bylaw which is what we believe is the direction staff is taking.

In closing, GRC is asking for fair and equitable treatment and is requesting council, as per bylaw 53-09, to direct staff to hold a licensing tribunal asap and also reinstate GRC rights as a stakeholder and taxpayer by giving GRC access to staff, and elected officials again which has been denied for over 18 months, as per the attached letters.

Sincerely,

Lynn Pratt
Grand River Cab Inc.



Reference: Grand River Cab

September 13, 2019

VIA REGISTERED MAIL

Grand River Cab Inc.
5 Grand River St N
Paris, ON N3L 2L9

Dear Sir/Madam:

Re: Your Invoice #1624 & #1625 and Expiration of Contract with County of Brant

Invoices #1624 and #1625 have been directed to my office for response.

Concerning Invoice #1625 wherein your company seeks additional compensation for subsidized transportation dating from February 1, 2015 to July 31, 2019, in the amount of \$104,270.16 inclusive, reflecting an additional 50% for trips from February 2015 to December 2018 and 40% from January 2019 to July 31, 2019, please be advised that the County disputes both the amount and justification for this invoice.

The County will not be paying this invoice as your claim is without merit and outside of the parameters of the contract. You are seeking to be compensated 100% which does not accord in any way whatsoever with the contractual agreement which is in place.

With respect to Invoice #1624, please be advised that the County disputes your claim in the amount of \$1,585.84 plus taxes for subsidized transportation for August trips at 40% for the same reasons set out above. The County will not be paying this amount to your company.

The County will abide by its obligations under the contract and pay the subsidized amounts for August trips at 60% which totals \$2,052.99 inclusive of all taxes.

Finally this letter will also serve as notice to you and your company that the County will not be extending the contract beyond its expiration of December 31, 2019. Please understand that the contract between Grand River Cab and the County of Brant will come to an end on December 31, 2019 and will not be renewed or extended.

Please be advised that the notice set out above in no way prejudices the County's ability to exercise its rights to terminate the contract with Grand River Cab upon 30 (thirty) days' written notice. In other words, should the County in its sole discretion, choose to terminate

the contract prior to December 31st, a written notice providing your company 30 (thirty) days' notice will be provided.

Regards,

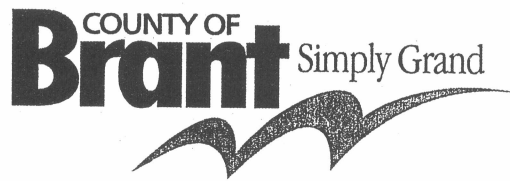
A handwritten signature in black ink, appearing to read "JV Zuidema". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Jyoti V. Zuidema
Solicitor and Corporate Counsel
County of Brant

JVZ/JVZ/dm

cc:

File
Client



Reference: Grand River Cab

October 11, 2019

VIA EMAIL and REGISTERED MAIL

Grand River Cab Inc.
c/o Lynn Pratt
5 Grand River St N
Paris, ON N3L 2L9

Dear Ms. Pratt:

Re: Notice of Termination of Contract with County of Brant and Your Invoice #1666

Please be advised that pursuant to Article 9.1 of the Subsidized Transportation Program Service Agreement, the County is exercising its option to terminate this Agreement by providing your company thirty (30) days' notice. Please consider this letter as that notice.

Therefore the Agreement will be at an end as of **November 11, 2019**. All legitimate charges pursuant to this Agreement incurred by the County up to this date will be paid to your company. No payments will be made for any claims beyond this date.

With respect to your submission of invoices #1666, please be advised that the County, once again disputes, your claim for the additional amount representing 40%. The County will not be making a payment to you for that additional amount. The reasons are the same as that enunciated in my correspondence to you of September 13, 2019.

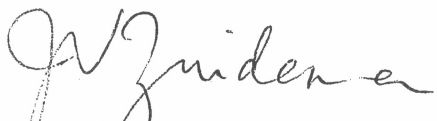
Further, please direct your future correspondence to my attention only. Other County Staff will not be responding to your inquiries. I remind you that your unsubstantiated allegations and veiled threats will not be treated lightly by my client. Should you venture into the areas of libel or slander, the County will vigorously take steps to protect its reputation.

With respect to your inquiries concerning the County's e-Ride transit program, please be advised that the County has taken the necessary steps to ensure that pertinent ordinances and regulations have been addressed as the County moves forward with the implementation of public transit services.

You had requested a response on this specific issue prior to October 15th and on this occasion, the County has obliged your request. Please be advised that future requests for information may be subject to standard County processes.

Kindly govern yourself accordingly.

Regards,

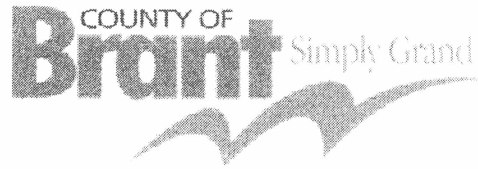
A handwritten signature in black ink, appearing to read 'Jyoti V. Zuidema', with a stylized flourish at the end.

Jyoti V. Zuidema
Solicitor and Corporate Counsel
County of Brant

JVZ/JVZ/dm

cc:

File
Client



Reference: Grand River Cab

April 1, 2020

VIA EMAIL and REGULAR MAIL

Grand River Cab Inc.
c/o Lynn Pratt
5 Grand River St N
Paris, ON N3L 2L9

Dear Ms. Pratt:

Re: Response to your Invoice dated March 31, 2020

Further to my letter to you of October 11, 2019 wherein the County exercised its right under Article 9.1 of the Subsidized Transportation Program Service Agreement, to terminate this Agreement with your company effective November 11, 2019, the County is in receipt of your invoice dated March 31, 2020.

Please be advised that the County continues to dispute the charges contained in your latest invoice as they simply repeat those contained in prior invoices.

I refer you to my correspondence of October 11, 2019 and September 13, 2019. The County's position has not changed.

The County has paid all legitimate charges pursuant to the above-noted Agreement up to the date of termination. As stated previously to you, no further payments will be made.

In my prior correspondence, I have asked that you direct all correspondence to my attention only. Despite that direction, you continue to contact other County Staff.

You have commenced litigation seeking to undermine the County's services and programs and you have failed at those attempts.

Please be advised that the County will no longer respond to your future requests for payment.

Kindly govern yourself accordingly.

Regards,

A handwritten signature in cursive script that reads "Diana Islek for". The signature is written in dark ink and is positioned above the printed name and title.

Jyoti V. Zuidema
Solicitor and Corporate Counsel
County of Brant

JVZ/ dt

cc:

File
Client

August 21, 2020

Via Electronic and Regular Mail

Grand River Cab Inc
c/o Ms. Lynn Pratt
5 Grand River Street, North
Paris, Ontario
N3L 2L9

Dear Ms. Pratt,

I am writing in response to your latest series of emails directed to numerous staff members at the County of Brant. The emails are in connection with complaints against the County's eRide micro-transit system; your repeated attempts to access provincial funds for transit when you have been advised that your taxi company does not fall into that category; your complaints against your competitor taxi companies; and your complaints directed at County personnel. I have also recently reviewed a file of dealings between the County and Grand River Cab and note a long history of baseless accusations against County staff, Council members, and other local business owners.

Please be advised that henceforth, staff will no longer be responding to your communications.

Despite numerous attempts to encourage you to utilize existing and accessible methods of addressing your concerns, you have a history of making baseless accusations against staff, threatening litigation against the County, and making spurious and libelous statements.

This approach will not be tolerated and as such, no response will be provided on future communications.

Please note that the County intends to fulfill its obligations concerning the enforcement of its by-laws and the County will not be reporting its actions to you.

You are of course, at liberty to avail yourself with the County's complaint process should you wish to lodge a formal complaint against a staff member. That formal complaint may be directed to my attention and you may obtain the necessary form from the Clerk, which I understand you have already requested.

In all other respects, the communication between the County and yourself will now come to an end.

Yours truly,

A handwritten signature in black ink, appearing to read 'M Bradley', written in a cursive style.

Michael Bradley

CAO, County of Brant