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May 14, 2012

Mr. Lloyd Tapp
252 Angeline Street North
Lindsay ON K9V 4R1

Via Courier

Dear Mr. Tapp;

Re: Michael Jack v. HMQ
Tribunal File Number: 2010-07633-I

Enclosed please find an amended witness summary for Karen German.

Yours truly,

A handwritten signature in black ink, appearing to read "Lynette D'Souza".

Lynette D'Souza
Counsel

LD/tt

Encl.

cc. Human Rights Tribunal of Ontario

**WITNESS SUMMARY: KAREN GERMAN
KAREN GERMAN IS UNDER SUMMONS TO ATTEND HEARING**

Karen German is an employee of the Ontario Provincial Police (“OPP”) and a representative with the Ontario Provincial Police Association (“OPPA”).

She had specific communications with Mr. Jack during his term as a probationary constable with the OPP. She will address her involvement as an OPPA officer assisting Mr. Jack.

At no time during their communications did Mr. Jack ever raise any issues relating to human rights violations, discrimination, harassment, or a poisoned work environment. Mr. Jack sought her assistance in respect of performance management issues, including an investigation into a Professional Standards Bureau incident.

Ms. German, on behalf of the OPPA, did not conduct an investigation into Mr. Jack’s treatment as a probationary constable at the Peterborough Detachment. Ms. German, on behalf of the OPPA, did not conclude that Mr. Jack was being targeted by staff at the OPP Peterborough Detachment, including Sgt. Flindall. Ms. German did not advise Mr. Jack that Sgt. Flindall was keeping surveillance on him. She did not advise Mr. Jack that Sgt. Flindall had asked staff to report to him about performance issues. Ms. German did not advise Mr. Jack that his transfer to another Platoon was the result of her investigation. She did not say that the Peterborough Detachment was a “very bad detachment”.

Ms. German did indicate during the PSB interview of Mr. Jack that she felt that Mr. Jack and others were being targeted by a certain individual. She did not think that Mr. Jack nor any others were being targeted on the basis of any prohibited grounds of discrimination. She was referring generally to the OPP Peterborough Detachment management’s use of the internal complaints procedure under the Police Services Act. She thought that the internal complaints procedure was being overused by management. Her belief that this procedure was being overused was not in relation to any prohibited grounds of discrimination but in relation to a management style. Ms. German will explain that during the interview she formed the belief that the complaint was frivolous given that key evidence was dated. Her comment about the frivolity of the complaint is not related to any prohibited grounds of discrimination.