

Patrick Fox
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2022-10-11

Attn: Registrar
BC Provincial Court
222 Main St.
Vancouver, BC V6A 2S8

Re: R. v. Patrick Fox;
Court file 244068-10-BC
List of outstanding disclosure and witness
requests

Dear Sir/Ms:

In court today the judge asked me to provide her a list of what I believe are the, as yet outstanding disclosure issues. That list is included below.

Because I am in custody at WPC I am unable to make or obtain photocopies. For that reason, I respectfully

request you please forward a copy of this letter to Crown Counsel and forward the original to the judge. Thank you. I apologize for the inconvenience.

Outstanding Disclosure Requests/Issues

1. Client log entries from Community Corrections.
2. Audio/video recordings of me at the probation office on 2022-04-19.
3. Transcript of interrogation of me by Det. McElroy on 2022-05-16.
4. Recordings and transcripts of any/all other witness interviews.
5. All artifacts related to all search warrants.
6. All artifacts related to all arrest warrants.
7. Identification of all justice system participants in the email conversation with David Layton on 2022-05-15.

8. All correspondence between the probation office and the VPD/Crown.
9. All artifacts and information relating to Judge Gordon's 2022-06-15 instruction to Adam Flanders to inquire what steps the BCPs and/or the police have taken over the past 6 years to get the website shut down. This relates to an abuse of process claim I intend to raise and the consequent stay of proceedings I intend to seek.
10. The computer firewall rules which were in effect on the VPD's network on 2022-05-16.
11. The computer firewall access logs for the VPD's network on 2022-05-16.
12. The user and administrator manuals for the Hunchly software which was purportedly used by the VPD to verify the website was accessible on 2022-05-16.
13. The charging document, which Mr. Poll insists states the Crown is proceeding by indictment.

Requests for Witnesses

1. Det Amber McElroy
2. Lead investigator (Qui Kai?)
3. Catherine Meiklejohn, Crime Data Analyst
4. David Layton, Prosecutor
5. Chris Johnson, Prosecutor
6. Julia Seath, Probation Officer
7. Kaela Trinis, Probation Officer
8. Adam Flanders, Prosecutor (re: abuse of process claim)

Sincerely,


Patrick Fox

P.S. I would also like to point out again that because this is not a jury trial there is absolutely no requirement that each of the multiple days of the trial be scheduled contiguously. And therefore, it strongly disputes the Crown's claim that January 23, 2023 was the soonest date they could get for trial. They could have scheduled 3 non-contiguous dates and if the trial ended up being completed in less than 3 days, as I anticipate it will, then all the better (see also item 9, on pages 8-9, of my 2022-08-18 letter). For these reasons, I believe the Crown should comply with Justice Wedge's order to expedite the trial date.