

Ministry of the  
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Ministère du  
Procureur général  
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October 16, 1997

Mr. Yvon Renaud,  
Barrister & Solicitor,  
138 Brock Street,  
SAULT STE. MARIE, ON

Dear Sir:

RE: R. v. Donald James TOWNSEND  
s. 264 October 29, 1997

Please find enclosed a Notice of Application re similar fact evidence. As well please be advised that I will be asking at trial for an amendment re date of the criminal harassment to narrow the time frame to the month of December in the same year as set out in the information. I also confirm that today I renewed the Crown's position that this matter can be resolved short of trial if your client would agree to enter into a s. 810 recognizance with terms that he keep the peace and be of good behaviour and that he not molest, harass or physically interfere with any member of Mr. Broadbent's family.

I trust this is satisfactory.

Yours truly,

Rodney A. Clark,  
Assistant Crown Attorney,  
North Region.

RAC:bh  
Encl.

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August 7, 1997

Mr. Yvon Renaud  
138 Brock Street  
Sault Ste. Marie, ON  
P6A 3B5

Re: R. v. Townsend

Dear Sir,

I enclose as further disclosure copies of statements from Veronika Brandt (4 pages) and David Harrison (2 pages) received by myself from police August 6, 1997.

I put you on notice that I will be making an application for the admission of similar fact evidence into trial, Re: your client's conduct in motor vehicles towards his neighbours.

Yours truly,

Rodney Clark  
Assistant Crown Attorney  
North Region

Encl.

/tt