

April 10<sup>th</sup>, 2012

To:

The City of Edmonton Mayor's Office, Stephen Mandel  
City of Edmonton City Manager's Office, Simon Farbrother  
City of Edmonton City Auditor Office, David Wiun  
Edmonton Combative Sports Commission, Chairman Ron Goltz

Re: Edmonton Combative Sports Commission Senior Officials Group (SOG) Official Complaint against ECSC Executive Director, Pat Reid.

This is a formal complaint to the City of Edmonton in regards to Edmonton Combative Sports Commission (ECSC) Executive Director Pat Reid, in relation to his actions and conduct as a City of Edmonton Employee. We collectively file this official complaint as a cross section group of (but not limited to) experienced and senior ring and technical officials, who for the purposes of this complaint, be referred to as the SOG, or Senior Officials Group. Our collective experience covers over 70 years, in all capacities within Combative Sports in both Edmonton and abroad. The basis of our complaints against the actions of current ECSC Executive Director, Pat Reid, is outlined as follows:

**Outline of Official Complaint:**

1. We allege that Reid collected licensing fees and other administrative fees, both defined and otherwise, outside the legal boundaries of the City of Edmonton bylaw #14308 in place for the calendar year of 2011. These fees were demanded and collected from ECSC officials, combative sports athletes, coaches, trainers, and promoters, to unknown amounts at this time.
2. We believe probable cause exists to suggest that Reid directed City of Edmonton employee Sean Gerke, to act on his authority to collect monies outside the legal boundaries of the City of Edmonton bylaw #14308, placing Mr Gerke unfairly in a position of wrongdoing.
3. We allege that there has been an attempted cover-up of these actions by refunding monies to certain individuals, under the guise of overpayments, when Reid clearly set out his fee expectations to them. The timing of these acts coincided both with an originally scheduled meeting between two SOG members and City Councillor Ben Henderson on January 5<sup>th</sup>, 2011, then rescheduled on January 23, 2012 in which this issue was directly raised. We furthermore question had action not been taken towards members of City Council, would any monies have been refunded at all or have gone unnoticed by civic authorities and those who had monies improperly collected from them?
4. That Reid has made ECSC event decisions in manner that suggests there is probable cause to believe that influence is being placed upon him by a local boxing industry individual who has threatened Reid with dire physical harm in the past. We will reference Reid's decisions regarding the Dec 9<sup>th</sup> 2011 KO Boxing event, in relation to official's selection in a world championship contest, which indicates a serious breach of trust, compromising the integrity of the sport of boxing, which he is entrusted in upholding.

5. We allege that Reid has been acting in an unprofessional manner as covered in bylaw #14805, Part 3, Section 16, Subsection's A and B, by his derogatory comments towards officials in good standing in the company of fellow officials. We allege that Reid has partaken in punitive and retaliatory actions against officials who have spoken out with concerns against his practices, these concerns which deemed valid by Community Standards Department Manager, David Aitken in a meeting with two SOG members on Tues, Jan 31, 2012. We further allege that punitive and retaliatory actions have directly resulted in other official's reluctance to step forward to add their names to this official complaint, in fear of facing similar actions and or termination.
6. We allege that Reid has made decisions that have compromised the health, safety, and well being of combative sports athletes by his decisions and actions during weigh-ins and events which have been interpreted as highly questionable by his own officials, and at times against the ECSC's own bylaws. We will outline examples of such actions.
7. Furthermore the SOG will summarize our concerns that have ultimately led us to no longer have any faith in ECSC Executive Director Pat Reid's abilities to perform his duties in a competent manner, in terms of following the laws and bylaws of the City of Edmonton, but also the rules of the combative sports he is entrusted with. It is our contention that Reid be removed immediately based upon the serious nature of his alleged acts which we will present.

#### **Details of Official Complaint:**

**1.1)** City of Edmonton Bylaw 14308, from its inception until being replaced effective Jan 1, 2012 (ratified on November 9<sup>th</sup>, 2011) clearly sets the licence fee schedule for all ringside officials at \$25 per year. On Jan 21<sup>st</sup> 2011 ECSC officials were sent the following notice from Pat Reid:

*From: Pat Reid (Pat.Reid@edmonton.ca)*

*Sent: January-21-11 10:38:08 AM*

*To: Pat Reid; 'Cameron quwek'; 'Matt McAllister'; 'mark.edel@shaw.ca'; 'David Bilocerkowec'; 'Budo Inc'; 'Bill Warwick'; 'Usman Ali'; 'David Haas'; 'Chris Loblick'; 'Craig Metcalfe'; 'Carolyn and Brian Bernhardt'; 'April S. Bedard'*

*Hi Folks:*

*Just wanted to say welcome to 2011! A new year and a new set of processes from the City of Edmonton, now that we are part of the City and its processes. One of the issues is the Cities request that we pursue a "cost recovery" model of operation. Of course that won't happen in the first year, but it does mean there will be an increase in licencing fees for all positions. **Right now the cost of licencing for 2011 in Edmonton will be:***

*Referees: \$200.00*

*Judges: \$200.00*

*Inspectors, scorers, timers, etc.: \$50.00*

*Ring General: \$200.00*

***Officials can pay for their licence over events held early in the year. A percentage can be taken from up to three events. At the present time we have our first three events in MARCH (nothing in January of course and nothing in February, since Aggression MMA (Moin Mirza and Harvey Panesear) have bought out TFC (Mark Sinclair and company.) Mark will stay on to assist with Aggressions shows - which will now be at the Shaw Conference Centre. ) So schedule as of to-day January 21 is as follows:***

***March 4 Unified MMA at the Mirage Banquet Hall***

***March 11 Aggression MMA at the Shaw Conference Centre***

***March 18 KOTC at the Northlands Expo Centre***

*I will be in touch regarding assignments for those dates.*

*\*(remainder of this communication excluded due to non-relevance)*

*Thank you.*

*Cheers, Pat*

*Pat Reid*

*Executive Director*

*ECSC*

At an official's seminar on Feb 12, 2011, a discussion was had that expressed direct concerns that the new fee proposals were completely out of line with industry standards and factual evidence was brought forth by 4 officials to support those arguments. Reid dismissed the factual evidence presented to him, nor requested to view it, and in no uncertain terms stated that this was a done deal and effective as of then.

At the time of the above email, bylaw 14308 was in effect and would not change until Jan 1, 2012, however it was clear that Reid was indicating that new fees with increases by as much as 700% were effective as of his email. He also laid out a set of expectations of payment of these unapproved fees from his officials which would conclude by late March of 2011. This is also evidenced by the following:

*From: Pat.Reid@edmonton.ca*

*To: Pat.Reid@edmonton.ca*

*Date: Thu, 10 Mar 2011 13:14:42 -0700*

*Subject: MMA Event Tomorrow Night*

*Hi Officials:*

*Two things - can you bring a cheque for your officials' license - make it out to "The Edmonton Combative Sports Commission". Moin (Promoter) of tomorrow's event says they are targeting a start of 7pm - so gauge your arrival time accordingly. I expect they won't start right at 7 - but we will go with that time just in case (this is a televised event.) Use your current ID and those without 2010 ID - no worries - all officials names will be on a list at the entrance to the venue. See you there!*

*Cheers*

*Pat Reid*

*Combative Sport Commission Director*

*Community Standards Branch*

*City of Edmonton*

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The proposed bylaw changes, 15638/15594, in which Reid had intimate knowledge of due to his involvement in their creation and submission to City Council for approval, were still not law by April of 2011, as admitted to by ECSC employee Sean Gerke in reply to a licensing inquiry:

*From: Sean Gerke (Sean.Gerke@edmonton.ca)*

*Sent: April-05-11 10:35:54 AM*

*To: Kenneth Blankenship*

*Good Morning Kenneth,*

*Thank you for your inquiry. Sorry about the delay in response. I must admit it was my error for not responding to your first inquiry. The e-mail that was forwarded to me by Randy Kirillo was lost in an array of e-mails. I apologize for not responding back the first time.*

Anyway, onto your question. **The current bylaw 14308 will no longer be current in a short manner of time. A new bylaw with a number of changes is in the process of being passed. I anticipate it coming into effect in about a month or so. The proposed changes to fees for officials are one of the many changes.**

The fees for Referee's/Judge's will be \$200 for the calendar year. An Inspectors license will be \$50 for the year.

\*(remainder of this communication excluded due to non-relevance)

Thank you,

Sean Gerke  
Manager of Operations  
Edmonton Combative Sports Commission  
780-496-5243

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As of April 2011, Pat Reid's assistant, Sean Gerke, clearly understood that bylaw 14308 was in effect but could not provide any concrete information as to the status of bylaws 15638/15594, nor could possibly know if they would even be passed into law or sent back to be revised. He merely speculated as to their passing. If as of April 2011, Pat Reid's assistant, Mr Gerke knew the status of bylaw 14308, then Reid himself cannot deny knowledge that bylaw 14308 was still in effect. Therefore any official's licensing fees, fighter, promoter, and or administrative fees charged outside the legal parameters of bylaw 14308 would have been clearly known as wrongly collected by the previously stated email. It is our contention that the ECSC under Pat Reid's direction did not cease in collecting monies based on an unapproved set of bylaws, for most of 2011 even as he knew bylaw 14308 was still in place. We view this as a gross violation of his duties as a City of Edmonton employee.

**2.1)** In the light of the information coming forth between involved parties regarding licensing and other promotional and administrative fees being charged outside bylaw 14308, we find it disturbing that City of Edmonton employee, Sean Gerke, may have been purposefully placed in a position of wrongdoing, by acting as Paymaster for the office of the ECSC. Mr Gerke's duties at ECSC events would have him responsible for the collection of, and payouts of monies in his duties as set by his boss Pat Reid.

We are outraged that any ECSC City employee would act in a manner which would define such a serious breach of public trust. It is unknown at this time the total amount of money involved in these actions, however, in consulting other involved parties within the industry, their estimates are in the thousands of dollars. In the wake of this information, we call upon the City of Edmonton to do the following:

- **Enact City Manager, Simon Farbrother, to follow the precedent set by Edmonton Community Standards Branch Manager, David Aitken, by immediately suspending ECSC Executive Director Pat Reid in wake of alleged financial improprieties regarding monies collected by the ECSC outside the legal boundaries of bylaw 14308, as Aitken did under similar circumstances of alleged financial mismanagement in 2009, based on a single formal complaint filed at that time.**
- **Enact City Auditor Department's David Wiun, to conduct a full and thorough investigation of the Office of the Executive Director of the ECSC, for evidence of any fraudulent activities or financial improprieties that fell outside the legal boundaries of bylaw 14308 in effect for 2011. We ask that Mr Wiun, as part of his investigation, properly determine the scope of which individuals have had monies wrongly charged of them, to include: ECSC officials, promoters, athletes, coaches, and trainers involved in combat sports under the ECSC direction. We ask that a thorough examination be done of the ECSC receipt records given to promoters that outline licensing fees, event fees,**

**administrative costs, file storage costs, and other miscellaneous charges, not covered by bylaw 14308.**

- **We ask that Mr Wiun formally and thoroughly interview Mr Gerke, as part of this investigation to ascertain the nature of direction and instructions given to him by Pat Reid who enabled Mr Gerke as Paymaster for the ECSC with cheque signing authority. We also ask that the City Auditor provide protection to Mr Gerke under the Whistle Blower Directive, which provides City of Edmonton Employees, protection against possible retribution, demotion, or dismissal in the wake of evidence they may provide into actions of possible financial wrongdoings by City Employees.**
  
- **That the Community Standards Branch plays NO part in an investigation of these allegations as members within the scope of the Community Standards Branch may be involved directly or indirectly in these allegations. As such, any investigative involvement by the Community Standards Branch would be in potential conflict with elements of its own department.**

**3.1)** Upon discovery that language in bylaw proposal 15594 contained non-factual wording to council in regards to reasons for licensing schedule changes as paraphrased as “to reflect current industry standards”, SOG Members Bilocerkowec and Edel each filed letters of complaint with members of City Council in late November, 2011, regarding their approval of those fees based upon non factual information. Since Reid was ultimately responsible for drafting the new bylaws and the final submission and wording in bylaws 15638/15594, he bears the responsibility of the non factual wording in regards to the new licensing schedule being to “industry standards”. With the passing of bylaw 15594, Edmonton becomes the most expensive jurisdiction anywhere in North America for ringside officials in combative sports, eclipsing the old high mark by 25% by enacting a 700% increase in these fees in one year. The two letters of complaint were forwarded to Community Standards Branch manager David Aitken, as well as Pat Reid. Reid has since provided no feedback on those complaints other than to acknowledge to one SOG member that he received them.

Shortly coinciding with a request for a scheduled meeting with City Councillor Henderson, SOG member Usman Ali received the following:

*From: Pat.Reid@edmonton.ca  
To: uali@shaw.ca  
CC: Sean.Gerke@edmonton.ca  
Date: Fri, 6 Jan 2012 16:26:00 -0700  
Subject: Fees for 2011*

*Hi Usman:*

*I hope you are feeling better Usman. You have had a difficult year. Sean and I were reviewing our year end files and discovered that you paid the licensing fee proposed in the 2011 Bylaw, before the Bylaw was passed by Council. We certainly did not anticipate the delay that occurred, but other matters came up that forced the delay toward the latter part of 2011, instead of earlier in the year.*

*Consequently the extra fee you paid in 2011 will be returned to you. A cheque will be forthcoming shortly.*

*\*(remainder of this communication excluded due to non-relevance)  
Cheers*

Pat

*Pat Reid*

*Combative Sport Commission Director  
Community Standards Branch  
City of Edmonton  
Tele: 780-495-0382  
Cell: 780-221-1868  
Fax: 780-429-6976*

A meeting was set up with SOG member Bilocerkowec and City Councillor Henderson to discuss the nature and concerns regarding the complaint on Monday Jan 23<sup>rd</sup>, 2012. Within that meeting the topic of licensing fees being charged outside the legal boundaries of the bylaws in place were discussed. An analogy was made of City Council attempting to collect unapproved taxes from taxpayers in advance of their ultimate ratification, to which Councillor Henderson commented that it would be illegal to do so.

It was after this meeting, starting on Jan 26<sup>th</sup>, 2012, Reid began issuing letters and cheques to certain officials informing them that they had "overpaid" their licensing fees as well. The use of this term is as insulting to the intelligence to the officials overcharged as it is inaccurate, as we have clearly demonstrated that Reid was demanding those fees paid as such. Given the time lapse from when Reid first demanded the unapproved fees to when certain refunds were issued, we question whether Reid would have issued any refunds at all, had letters of complaint never went to council in the first place? Reid knew that bylaws 15638/15594, were approved by council on Nov 9<sup>th</sup>, 2011, to come into effect Jan 1<sup>st</sup>, 2012, therefore he was completely aware that all fees that were collected under his instruction outside the legal parameters of bylaw 14308 for the year 2011 were indeed improper. In fact over 2 months had passed without Reid informing any official whatsoever that they had monies taken from them that the ECSC was not entitled to. It is our opinion that there cannot be any explanation for this drawn out pattern of behavior that can be plausibly explained, for Reid was instrumental in the draft, submission, and enactment of bylaws 15638/15594 and would often update ECSC event officials as to the latest developments regarding ECSC bylaws and City Council. We once again refer to our calls of a complete investigation in Sec 2.1 of this complaint, in regards to these alleged actions.

**4.1)** Reid's actions in relation to the events leading up to the Dec 9<sup>th</sup>, 2011 KO Boxing event shows signs in our opinion, that certain decisions in regards to officials selection for contests may have been influenced directly by a third party, who by their nature of involvement in the sport, show an obvious bias towards their own interests. Reid foreshadowed his intentions of sudden exclusionary tactics towards specific officials by the following email to where a certain group of officials was singled out. We have included only the portion of the email that deals directly with this section of our complaint:

*From: Pat Reid (Pat.Reid@edmonton.ca)  
Sent: November-09-11 3:36:37 PM  
To: Pat Reid (Pat.Reid@edmonton.ca)*

*.....In terms of BOXING, I would be interested in promoting any of you not already working other boxing events in this province outside of Edmonton (or events in BC). Calgary hosts boxing events and I understand the new Cree Nation Combative Sports Commission at River Cree will be doing events as well. I imagine you are already on Calgary's radar. **I mention the opportunity to promote you to a wider audience because our one promoter has asked me to expand our pool of boxing judges scoring events here in Edmonton - to include some of Calgary's boxing judges. With each promoter staging events here in Edmonton, since they pay the costs of officiating, we do allow them to have the right***

**to submit a list of names of qualified judges that we discuss and we decide wo to pick from.** The Edmonton Commission picks the judges per event, but we understand and try to accommodate to some extent, promoter's wishes. **This doesn't allow a lot of boxing judging opportunity as a consequence, considering how many boxing judges we have.** I will try to include everyone over the course of the year.

**The City approved new Bylaws outlining how the Commission will operate and it includes a confirmed license fee for working officials.** We will have more information on this topic in the coming months.

Let me know your interest in the refresher course.

Cheers, Pat

The roster of ring officials currently working for the ECSC is as talented and accomplished in the sport of boxing than at any time in the ECSC's history with 3 current officials currently working at an International World Championship level. It is important to note how Reid contradicts himself in his email by referencing that the pool of officials needs to be expanded in the first bolded part, then in the third bolded part he admits how deep the pool of officials is.

*(It is also crucial to point out that the final bolded part indicates Reid new immediately when bylaws 15638/15594 were ratified by council as he sent out this information on the exact day they were ratified. This further confirms our complaint arguments set out in Sec 1.1 and 2.1 of this document, and provides proof that he was aware that bylaw 14308 was in fact law the entire period of 2011)*

At the weigh in on Dec 8<sup>th</sup>, 2011, Reid was heard and witnessed having an open discussion with KO Boxing promoter and boxing trainer Milan Lubovac, in which part of the discussion centered around the exclusion from all future events two specific officials, who currently have the highest level of training, certification, and international world championship experience as ring officials on the current ECSC roster. This discussion was openly heard by ECSC technical official Mickey Ali who was part of the ECSC team present at the weigh in process. Mr Lubovac was loudly voicing his displeasure of these two officials, along with their abilities, and was making statements taking credit for their achievements and position as ring officials within the World Boxing Council. Reid was openly seen and heard agreeing with Mr Lubovac's opinions. We point this incident out as Mr Lubovac and Mr Reid have dubious history which can be seen in the following email from Reid to ECSC official Mark Edel in the wake of an incident where Mr Lubovac allegedly threw a water bottle at Mr Edel in the wake of a decision regarding his fighter:

From: Pat Reid <Pat.Reid@edmonton.ca>

Date: Tue, 07 Dec 2010 10:00:30 -0700

To: 'mark edel'

Subject: RE: Dec 10 mma Event

Hi Mark:

I met with Milan for 3 hours - **we talked about a lot of things - including his behaviour.** Too much information to pass on - but the apology was sincere although **he did say if he was really pissed off at you personally, it would have been a full bottle and in the face** (at least he's honest). **He has threatened my life to the point that the City finally had the police department pay him a personal visit! Milan was frustrated with the decision figuring (with some logic) that a "tie" goes to the hometown athlete.** \*\* Unfortunately for him this was not a tie, so the logic was a bit of a stretch.

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*(\*\* We strongly point to Reid's comment regarding Mr Lubovac's distorted view of how a decision is rendered in the sport of boxing, and Reid's implied agreement with those views)*

Also on Dec 8<sup>th</sup>, 2011, Reid engaged with a conversation with ECSC technical official Mickey Ali where Reid made derogatory comments about SOG members Bilocerkowec and Edel in the wake of learning about their letters to Edmonton City Council, as per Sec 3.1, and openly stated that Edel and Bilocerkowec were

“finished for good” with the ECSC. Yet at no time has Reid spoken directly to Bilocerkowec or Edel in regards to their letters to council of which the validity of the concerns were confirmed by Reid’s superior David Aitken (subsection 5/outline of official complaint) on Jan 31<sup>st</sup>, 2012. It is our opinion that Reid’s decision making was already prejudiced and he was making disciplinary actions and derogatory comments regarding said officials with no due process offered.

On Dec 9<sup>th</sup>, 2011, many experienced ringside observers, including several officials of the ECSC were surprised and bewildered at Reid’s selection of two out of three officials for the main event WIBA World Title Contest. With ABC certified, experienced, and seasoned officials at ringside, Reid chose to place 2 non ABC certified officials in the main event. One who had judged only 8 rounds of professional boxing in the prior 10 years, and the other who was working as a professional judge in a professional boxing contest for the first time that evening.

Reid has throughout 2010 and 2011 has mandated that in both MMA and Boxing, that only certified officials be recognized to work professional contests. Yet on Dec 9<sup>th</sup>, 2011, he conveniently violated his own mandate for this boxing event by not only choosing 2 non certified officials, but two that could not possibly have been any less experienced given the availability of officials at ringside. The only ABC certified judge assigned to that contest, Cameron Quwek, felt he was being placed in a position where his continued level of assignments may be directly determined by what kind of decision he rendered. Mr Quwek felt the manner in which Reid selected his officials undermined his ability to perform his duties in a non partial and professional manner. It was to this that Mr Quwek confronted Reid after the event to ask him what Reid was looking to accomplish by his selections, to which Reid used the one sided nature of the contest to justify his selection. Mr Quwek came away from his meeting with Reid unconvinced Reid’s argument held any merit, nor did he understand the nature of his actions in relation to the fairness of the contest.

To add, during a discussion between Reid and Bilocerkowec, instigated by Reid on March 19<sup>th</sup>, 2011, Reid falsely stated that one official assigned to judge the Dec 9<sup>th</sup> contest, who had no prior professional experience as a judge, was indeed an experienced judge with the ECSC. When factual evidence was presented to the contrary, Reid then stated that official then had judging experience in Montreal. When that too was proven non factual, and a question was posed to Reid if he indeed had bothered to check the history of that official, Reid stated he had deferred that to someone else, unnamed. This entire exchange along with details of the entire conversation was witnessed by ECSC technical official, Tony Hefford.

Reid has more than once attempted to use a directive of involvement of promoters to decide which officials are given assignments when questioned about this particular event. Reid sent the following to SOG member Cameron Quwek:

*From: Pat Reid <Pat.Reid@edmonton.ca>  
To: 'Cameron quwek' <camquwek@yahoo.com>  
Cc: Sean Gerke <Sean.Gerke@edmonton.ca>  
Sent: Thursday, March 15, 2012 12:35:47 PM  
Subject: RE: Boxing Officials Get Together Monday March 19*

*Cam, we realize the licensing fee has increased and this has caused some hard feelings. Another thing that may have caused some hard feelings is **the fact that we have also instituted discussions with promoters in terms of the selection of officials working "their" - "our" - "the" - events. Promoters do not tell us who they want to officiate but they certainly have the prerogative to tell us who they do not want to officiate their events if they perceive a conflict of interest exists between promoter and official.***

*I am of the opinion that the commission works in partnership with the promoters just like we do with MMA. (It is also the same procedure with the International Ice Hockey Federation which all countries followed at the World*



Championships when I was the Director of Operations of Team Canada.) **Again - the promoter does not tell the commission who to use - that list of qualified and certified officials is a long one - what the promoter can do is tell the commission who they feel they have a conflict with and therefore respectfully request that the commission pick someone else from the list to officiate at their event. The commission then decides if it is prudent to do so.** In your case, the promoter has no problem having you work their (KO Boxing) events at any time. *The commission holds you in high regard as a boxing judge and we would of course use your services as a boxing judge every opportunity that we can. That's the bottom line.*

*As to the personal issue you mentioned, I understand your time constraints. I won't book you in for other bouts that night. You will have to estimate when to arrive to be ready for the title fight. I leave that responsibility to you. See you Friday night Cam.*

*Cheers, Pat*

*Pat Reid*

*Executive Director ECSC*

In this email Reid makes reference to a practice of mutual involvement to decide which officials will work an event. In gathering information from other promoters in combat sports in Edmonton, we have not been made aware of any such discussions happening with other promoters with any sort of regularity whatsoever, except in the case of Mr Lubovac. He also contradicts his November 9<sup>th</sup>, 2011 email once again by admitting his roster of qualified officials is deep. During the discussion on March 19<sup>th</sup>, 2012 with Mr Bilocerkowec, as to determine the rationale behind the sudden exclusion of long standing senior officials from past and future events, Reid indicated that Mr Lubovac claimed he had a conflict with them and that Reid had a list of officials that would no longer work KO Boxing events. When asked for an explanation to the nature of the conflict, Reid refused to offer any additional information, even when asked several times. When Reid was asked why he chose not to discuss any perceived conflict with the officials in question prior to his exclusion, Reid simply stated that Mr Lubovac pays for the show and if Mr Lubovac wishes not to use specific officials, then Reid accommodates his wishes.

Reid's previous history with Mr Lubovac, in relation to death threats and police intervention, combined with his inconsistencies in following his own "*instituted discussions with promoters*" creates probable cause to believe that Mr Reid's decision making is being affected by a clearly biased individual who has expressed openly his feelings on certain officials who do not deliver decisions favorable for his fighters. At no time had Reid ever met with officials in question to discuss any details of a perceived conflict, nor at any time have the aforementioned officials have ever faced any sort of disciplinary actions or discussions in relation to performance issues in their duties at any time in their careers. However Reid stated clearly to Mr Bilocerkowec on March 19<sup>th</sup>, 2011, that he, along with Mr Edel, and Mr Metcalfe, would no longer work anymore KO Boxing events in Edmonton. We raise the following questions in the wake of the Dec 9<sup>th</sup>, 2011 event and subsequent actions taken by Reid:

- What determines a "*conflict between the promoter and official*"?
- Why did Reid choose at no time to contact officials singled out by Mr Lubovac to discuss the "*conflict*" Mr Lubovac claims he has?
- What is the exact nature of this perceived conflict?
- What are the criteria for making Reid's 'do not use' list in relation to KO Boxing events?
- Does Reid's agreement with a biased 3<sup>rd</sup> party constitute a conflict of interest between Reid and his own ECSC officials, whom he ignored throughout his decision making process?
- Does a much larger and more serious conflict of interest exist between Reid and an individual who has threatened Reid's life in the past, in determining who does and who does not work ECSC events promoted by that individual?
- Why if Reid on more than one occasion, made direct reference to the list of qualified officials being a long one, did he choose to place officials with the least amount of experience and qualifications

possible into a World Title Contest on Dec 9th, 2011, when experienced and qualified officials were at ringside and available?

Based on these recent developments and with relation to the open discussion had on March 19<sup>th</sup>, 2011 with Mr Bilocerkowec, we feel there is probable cause to believe that Reid is following an agenda that is not in the best interests of the fairness and transparency of the sport of boxing, clearly exemplified by his decisions and actions around the Dec 9<sup>th</sup> 2011 KO Boxing event. We strongly feel there is simply no rational explanation that could be offered that can competently explain his official's selection for the WIBA World Title contest. Furthermore we strongly feel Reid's refusal to share details regarding Mr Lubovac's apparent conflict with 3 senior ECDC ring officials, indicates a biased position which places him in conflict with his own officials. If as Mr Reid claims, he never demanded a proper explanation from Mr Lubovac for the permanent exclusion of 3 of Reid's top officials, two of which have active international world championship experience, then we contend that Reid is not performing his duties in a fair and impartial manner, and is undermining his own officials reputation, by neither offering details of their exclusion, nor any prior consultation or due process before enacting his permanent exclusion of said officials from specific events.

**5.1)** We also take issue towards Reid's comments to technical official Mickey Ali on Dec 6<sup>th</sup>, 2011, as referenced in section 4A, clearly outlines his intent to permanently remove officials Bilocerkowec and Edel in wake of their letters to Edmonton City Council in late November 2011. As was stated in the previous section, Reid at no time held any discussions with officials Bilocerkowec and Edel, as to the nature of perceived conflicts as alleged by Promoter Lubovac, nor did he ever contact said officials in relation to their letters of complaint regarding the misleading wording in bylaws 15638/15594. However Reid had no apparent issue with discussing the situation in the presence of other ECSC officials and media members present at the Dec 8<sup>th</sup> 2011, weigh in.

We contend that Reid's actions in these matters displays a high degree of unprofessionalism and constitutes defamatory and punitive actions taken towards officials without any due process offered to them at any time. For someone in his position to be making such comments to other officials and in public undermines the confidence officials have in Reid's abilities and damages those official's reputations with no ability for due process and rebuttal. Furthermore, others witnessing his punitive actions portrayed in public towards officials with valid complaints has further created an environment where those who support our stance in private, are unwilling to come forth to share their own complaints in fear that they too will be dealt with without due process and being removed from duty, due to no fault of their own.

**6.1)** We have probable cause to believe that Reid has made operational decisions that may have jeopardized the health and safety of combative sports athletes in ECSC events. We point to a cross section of 3 examples from a larger pool of incidents since Reid has been with the ECSC:

6.2 – At the Heat XC 6 MMA event on October 15<sup>th</sup>, 2010, the Payne vs. Glover contest was to be cancelled as per Reid's instructions to technical officials Ali and Bedard, based on a weigh-in imbalance of over 15 lbs. One hour prior to the event start Reid then instructed technical officials Ali and Gerke to inform the promoter of the cancellation, who in turn raised a fuss at being informed at such a late hour. Upon further discussion Reid relented and allowed the fight to continue. It is important to note that at fight time, the weight differential between Payne and Glover was 35lbs due to rehydration. This differential was considered unsafe by technical officials yet was allowed to continue. Technical officials advised the referee of the contest to immediately stop the fight at first signs of trouble. To allow a contest with such a large weight variance both at the weigh in time and even larger variance on the night of the contest showed a level of disregard for fighter safety, which Reid is entrusted with upholding first and foremost.

6.3 – At the Aggression 7 MMA contest on June 11<sup>th</sup>, 2011, serious mechanical issues with the cage that held the match began occurring where the floor was collapsing and a hole opened up underneath. Matches had to be stopped and repairs attempted however they did not resolve the situation. One match resulted in a ‘No Contest’ due to the condition of the fighting surface where a foot went through. Technical officials present at the event wished to call a halt to the event as proper conditions were not being met. Reid made the decision not to cancel the event even after repeated issues could not result in a proper and safe environment for the athletes to compete on from start to finish of the event. Given this, there is probable cause that given the nature of the sport of Mixed Martial Arts, athletes were put in an unnecessary and dangerous environment that could have resulted in catastrophic injuries not consistent to normal combat sports, due to the hazardous surface. Had such an injury or death had occurred, the City of Edmonton may have been exposed to a potentially enormous liability based on the decision of Reid to allow it to continue, against recommendations by his own experienced people.

6.4 – At the MFC 31 weigh-in on October 6<sup>th</sup> 2011, main event contestant, Rameau Thierry Sokoudjou, was allowed to leave the weigh-in procedures with his combat gloves in his possession. Upon discovery of Sokoudjou having possession of his gloves and leaving the weigh-in, he was halted by 3 ECSC senior technical officials who attempted to retrieve them. Sokoudjou stated that Pat Reid had allowed him to take them with him overnight so the gloves could be stretched to fit better. Incredulous over this revelation, Reid was confronted of this by his officials and upheld his decision. Bylaw 14308, in effect on October 6<sup>th</sup>, 2011 clearly states:

*5.28 The event license requires that the Promoter ensures sufficient new, unused, approved gloves in different sizes, are brought to the weigh in for fighters to choose their gloves for use in the event the following night. **The Commission will bag the gloves each fighter selects along with the required tape and gauze, will seal and initial the bag along with the fighter, and Commission officials will retain the bagged gloves, bringing them to the competition the next night, for the fighters to wear in the competition.***

Reid’s decision to overrule the technical officials and allow Sokoudjou to remove the gloves from the possession of the ECSC to keep them in his possession until the night of the fight is a gross violation of rule 5.28. Upon entrance into the ring for the main event contest, Sokoudjou’s gloves were clearly seen tampered with by having the bottom ‘knife edges’ of the gloves cut out, exposing parts of Sokoudjou’s taped fist. Photographic evidence of this was clearly seen on HDNet’s television broadcast, and still photo images of Sokoudjou’s gloves alongside his opponent Ryan Jimmo’s gloves, which do not appear tampered with, can be viewed on [www.topmmanews.com](http://www.topmmanews.com) in their photo rundown of the contest posted October 8<sup>th</sup>, 2011. There is simply no disputing the fact that one athlete’s gloves were visibly tampered with, and the athlete in question was the one that Reid allowed to keep his gloves in his own possession for 24 hours. What remains unknown is what else may have been done to the gloves in this 24 hour period?

One of the most serious and egregious offences in the history of combat sports is the use of tampered gloves and or hand wraps in competition. Numerous examples exist of serious damage and permanent injury as the result of such actions that in some cases have led to fighter deaths. Individuals who have been caught trying to tamper with hand wraps and or gloves have faced lengthy and in numerous cases, lifetime bans from combat sports. For Reid to purposely enable a fighter and his team the mere opportunity to modify the gloves in any way constitutes a serious violation of fighter safety and gives probable cause to believe that gross negligence may have been committed by allowing that opportunity. This is exemplified by Sokoudjou’s gloves, clearly seen to be tampered with by a worldwide TV audience. We feel that Reid’s decision to allow Sokoudjou to retain possession of his gloves with no ECSC supervision, clearly demonstrates that Reid is unaware of his own bylaws and demonstrates that he is unable to comprehend the nature of his decisions in terms of how they would impact both fighter safety, but the integrity of the sports he is entrusted in stewarding. It is our contention that this example, in where City of Edmonton

bylaws were breached by the operational head of the ECSC, exposed the City of Edmonton to a potential criminal or civil suit should a death or serious injury had occurred as a result of tampered gloves.

**Summary of Complaint:**

Each member the SOG that has stepped forth to be a part of this complaint has done so with risk to their own continued involvement in combative sports within Edmonton, due to punitive and retaliatory actions already being displayed as we have outlined. No member of the SOG has had any cause or reason in the past, to take such drastic measures as these, however we feel we are faced with extraordinary circumstances not seen in our shared experiences as ECSC officials in good standing. We have performed our duties to the utmost of our abilities and do so out of the passion and love we have for the combat sports we devote our time to. However, from Pat Reid's arrival we have seen a clear pattern of questionable decision making, questionable practices, and habits on the part of Pat Reid, which over time, has solidified our resolve to express a complete and utter non confidence in Pat Reid's abilities to carry on his duties as Executive Director of the Edmonton Combative Sports Commission in a proper manner.

By far the most disturbing is his actions around the collection of monies outside the bylaw 14308 for 2011. We feel this is a serious breach of public trust and demand that the City of Edmonton take immediate steps to conduct a full line by line investigation to the conduct of Executive Director Reid in regards to these alleged financial improprieties. The facts are the facts, Reid's own emails and conduct confirms he was well aware that bylaw 14308 was in place from the moment he sent his email to officials on Jan 21<sup>st</sup>, 2011, outlining new, unapproved by city council, fees that in his own words "*were effective as of now*".

In closing, we are aware of a climate that exists currently where those who have been affected by issues contained in this complaint are being pressured to stay quiet out of fear that if they complain further, the City of Edmonton would simply kill their sport by shutting down the ECSC. We wish to state that there are many individuals involved in combative sports in Edmonton from all sides who devote their time, expertise, skills, passion, sweat, and blood to build a solid, profitable industry. We express our concern that in the wake of these and other allegations, that those who have worked hard to build and excel at their sport, not be punished by the actions of a select few, in the wake of actions we hope the City of Edmonton takes in these matters. We have spoken directly with many fellow officials, involved individuals, and parties that support our efforts but are apprehensive in stepping forth on their own, due to fear of reprisal. We would hope that they may find the courage to publically support our stance in wake of us boldly coming forth, by expressing their own concerns.

We are also aware that this is not the first time the individual in question has been subject to complaints about breaches of bylaw and conduct from within the ECSC and from outside. We strongly ask that the City of Edmonton not ignore these, or other complaints, and acts accordingly to resolve these issues.

Respectfully,

Usman Ali – ECSC Honor Roll Inductee/ Former ECSC Chair/Formal ECSC Commissioner/ ABC Judge

David Bilocerkowec – World Boxing Council, North American Boxing Federation, ABC Judge

Mark Edel – ABC Judge/ Former ECSC Inspector/ Former ECSC Timekeeper

Ron Hayter – Former ECSC Chair/ Former ECSC Executive Director/ Former ECSC Commissioner / Canadian Boxing Hall of Fame Member/ ABC Judge

Cameron Quwek – World Boxing Council, ABC Judge

William Warwick – ABC Judge/ Current Senior ECSC Ringside Official