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Jason Crowley
Chief, Windsor Police
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Sebastian Pirrone
Director Corporate Security, City of Windsor
350 City Hall Square West

Drew Dilkins
Mayor, City of Windsor
350 City Hall Square West, Suite 510

Wira Vendrasco
City Solicitor, City of Windsor
400 City Hall Square East, Room 201

January 21, 2026

Chief Crowley, Mayor Dilkins, Mr. Pirrone and Ms. Vendrasco,

I am Counsel for the Canadian Constitution Foundation, a charity that defends Canadians' constitutional rights and freedoms. I am writing in regards to the unlawful arrest, charge, and expulsion of Windsor resident Spencer (Robert) Allossery from the skating rink at City Hall on January 5.

Mr. Allossery was skating with a sign that read: "Under the 2001 Ontario Municipal Act, you're legally required to provide a complete budget." This protest was clearly protected by s. 2(b) of the *Charter of Rights and Freedoms*. Municipalities cannot limit this type of expression without a valid public purpose.

As Justice Bradley Miller wrote for the Court of Appeal in *Bracken v Fort Erie*, 2017 ONCA 668:

"There can be no question that the area in front of a Town Hall is a place where free expression not only has traditionally occurred, but can be expected to occur in a free and democratic society. The literal town square is paradigmatically the place for expression of public dissent."

Mr. Allossery is seeking dismissal of the charge under the *Trespass to Property Act* through the appropriate channel. He also seeks a written apology from the City of Windsor and Windsor Police acknowledging these unconstitutional actions.

If he does not receive an apology, the CCF will consider further legal action.

Thank you,

A handwritten signature in black ink, appearing to read "JD", written over the typed name "Josh Dehaas".

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