

From: [Randy Pitre](#)
To: [Jessica Gillis](#); [Philip Rafuse](#); [Janine MacLean](#)
Cc: [Gordon MacFarlane](#); derek.key@keymurraylaw.com; [Randy Pitre](#); nkember@strategicenterprises.ca; lain.mccarvill@keymurraylaw.com
Subject: Response to Lain November 15th, 2023 Letter to Commission attached.
Date: Thursday, November 16, 2023 1:24:19 PM
Attachments: [20231116111314471.pdf](#)

Good Afternoon. This is In response to Lain m. Mccarvill letter yesterday dated **November 15, 2023**, and I will still be filing a Rebuttal as indicated next week. I provide the following in response to his November 15th latter. Lain Mccarvill is still proceeding and filing Documents and **CC** Derek Key on the Matter **without having addressed** the initial step of **Confirming Derek Keys Role** in this matter. There **is a reason** as to why Lain Mccarvill **is refusing to answer and address this question** and it's the Appellants belief that Derek Key is in a conflict of interest as it relates to the Applications Nathan Kember & his Companies made that were **before the City of Summerside** that are subject of the Appeals. The Commission needs to **"Confirm" Derek** Keys Role Presently in this regard as it does have a **direct bearing** on the files and appears Derek Key may have a vested interest and may very well indicate why Derek_Key is presently being CC on matters. This **needs to be addressed** and I am asking **Jessica Gillis** and or **Phillip Rafuse** to **Request from Lain Mccarvill / Key Murray Law and** or **Derek Key** to **"confirm & define"** what exactly **"Derek Key involvement or Representation in this matter is at this time"** in writing. Please send me a copy of the Letter of **Request** and **response**. Lain McCarvill at the last sentence of his November 15 letter asked the commission to not **consider Mr. Kembers/Andrew Campbells of Cox & Palmer June 5th , 2023,** **withdrawal of the appeal**. The Appellant's position is that the **June 5th** withdrawal of the Appeal is **prima facia evidence** that **must be considered** and **cannot be separated** as it is **directly related** and **inner- twined** in the events leading **up to** and **after** involving the same related property PID #, same individuals, same permits and same matter. Lain McCarville cannot **"Cherry Pick"** evidence that he feels is **damming to his clients** and **Derek key** within his response/reply before the commission to gain a **tactical advantage**". The City had been maintaining throughout that the decision of **June 5th, 2023**, to deny had been **Revoked** and **Rescinded** that was subject of the Appeal of **June 5th, 2023**. The fact of the matter is that the Matter was actually **"Withdrawn"** as **"confirmed"** not only by Mr. McCarville in his last paragraph of his **November 15, 2023**, Letter but also **evidence** Appellants have obtained throughout the file. Another reason the Appellant suspects Mr. McCarville wants the Notice of Appeal of **June 5th, 2023**, that was **filed** and **signed** by **Andrew Campbell** on behalf of his Client Nathan Kember and Strategic Holdings Inc not to be considered, is that it would be **Completely Contrary** " and in total **"Contravention" and** flies in the face of Mr. McCarvill **present position** that he is claiming before the commission in that the **Decision Cannot be appealed citing jurisdictional issues**. Andrew Cambell certainly thought differently. Appellants furthermore submit that Andrew Campbells, upon filing the Appeal on **June 5th , 2023**, only Appealed the decisions of **Strategic Holdings Inc.** He did not list or Appeal the decisions of **"Strategic Enterprises Inc" which was the second name on "two of the**

Applications" that had been considered by counsel and Denied. As a result, when Andrew Campbell withdrew his Appeal on June 5th, 2023, he only withdrew the permits as it related to one of the two companies that were considered and denied. As a result, the June 5th, 2023, and only one of the two Names withdrawn, the Appeal must be considered in the Consolidation of the Appeals.

Kind Regards

Randy Pitre