

**FORM 2**

**(Offence Act)**

**INFORMATION**

**CANADA  
PROVINCE OF BRITISH COLUMBIA**

This is the information of Bobby Bains, Bylaw Officer, of the City of Victoria, in the Province of British Columbia (the "Informant").

The informant says that he has reasonable and probable grounds to believe and does believe that:

**Count 1**

On or about September 20, 2019, JOHN MUELLER dba I-TOW GROUP, charged fees other than or greater than the prescribed fee for towing of a motor vehicle that was improperly or unlawfully parked contrary to Section 8(1) of the City of Victoria Towing and Immobilizing Companies Bylaw No. 11-033.

**Count 2**

On or about September 20, 2019, JOHN MUELLER dba I-TOW GROUP, failed to ensure an employer or agent of the towing company was available 24 hours per day to release a vehicle, contrary to Section 12(1)(a) of the City of Victoria Towing and Immobilizing Companies Bylaw No. 11-033.

**Count 3**

On or about September 20, 2019, JOHN MUELLER dba I-TOW GROUP, failed to immediately release a vehicle upon payment of the applicable towing and storage fees, contrary to Section 12(1)(d) of the City of Victoria Towing and Immobilizing Companies Bylaw No. 11-033.

**Count 4**

On or about November 15, 2019, JOHN MUELLER dba I-TOW GROUP, failed to have a business name and telephone number painted or otherwise permanently affixed to the sides of a vehicle used to carry on the business of towing or immobilizing improperly or unlawfully parked vehicles, contrary to Section 16 of the City of Victoria Towing and Immobilizing Companies Bylaw No. 11-033.

Count 5

On or about November 15, 2019, JOHN MUELLER dba I-TOW GROUP, charged fees other than or greater than the prescribed fee for towing of a motor vehicle that was improperly or unlawfully parked contrary to Section 8(1) of the City of Victoria Towing and Immobilizing Companies Bylaw No. 11-033.

Count 6

On or about November 23, 2019, JOHN MUELLER dba I-TOW GROUP, charged fees other than or greater than the prescribed fee for towing of a motor vehicle that was improperly or unlawfully parked contrary to Section 8(1) of the City of Victoria Towing and Immobilizing Companies Bylaw No. 11-033.

Count 7

On or about November 23, 2019, JOHN MUELLER dba I-TOW GROUP, failed to prominently display a schedule of the fees which may be charged at each place of business and each lot where vehicles towed for being improperly or unlawfully parked are stored, contrary to Section 8(6) of the City of Victoria Towing and Immobilizing Companies Bylaw No. 11-033.

Count 8

On or about December 18, 2019, JOHN MUELLER dba I-TOW GROUP, failed to issue a proper written receipt including time and location of when and where a vehicle was connected to a towing vehicle, contrary to Sections 13(1) of the City of Victoria Towing and Immobilizing Companies Bylaw No. 11-033.

Count 9

On or about December 18, 2019, JOHN MUELLER dba I-TOW GROUP failed to have a business name and telephone number painted or otherwise permanently affixed to the sides of a vehicle used to carry on the business of towing or immobilizing improperly or unlawfully parked vehicles, contrary to Section 16 of the City of Victoria Towing and Immobilizing Companies Bylaw No. 11-033.

Count 10

On or about December 18, 2019, JOHN MUELLER dba I-TOW GROUP, failed to maintain a sign at a storage lot owned or operated by the towing company that clearly and legibly states that there is no charge for the first hour of storage of a vehicle that was towed for being improperly or unlawfully parked, contrary to Section 10(2) of the City of Victoria Towing and Immobilizing Companies Bylaw No. 11-033.

Count 11

On or about December 18, 2019, JOHN MUELLER dba I-TOW GROUP, charged fees other than or greater than the prescribed fee for towing of a motor vehicle that was improperly or unlawfully parked contrary to Section 8(1) of the City of Victoria Towing and Immobilizing Companies Bylaw No. 11-033.

Count 12

On or about December 18, 2019, JOHN MUELLER dba I-TOW GROUP, charged fees other than or greater than the prescribed fee for towing of a motor vehicle that was improperly or unlawfully parked contrary to Section 8(1) of the City of Victoria Towing and Immobilizing Companies Bylaw No. 11-033.

Count 13

On or about December 18, 2019, JOHN MUELLER dba I-TOW GROUP, failed to have a business name and telephone number painted or otherwise permanently affixed to the sides of a vehicle used to carry on the business of towing or immobilizing improperly or unlawfully parked vehicles, contrary to Section 16 of the City of Victoria Towing and Immobilizing Companies Bylaw No. 11-033.

Count 14

On or about December 18, 2019, JOHN MUELLER dba I-TOW GROUP, failed to prominently display a schedule of the fees which may be charged at each place of business and each lot where vehicles towed for being improperly or unlawfully parked are stored, contrary to Section 8(6) of the City of Victoria Towing and Immobilizing Companies Bylaw No. 11-033.

Count 15

On or about December 18, 2019, JOHN MUELLER dba I-TOW GROUP, failed to issue a proper written receipt which includes the time and location of when and where a vehicle was connected to a towing vehicle, contrary to Section 13(1)(b) and (c) of the City of Victoria Towing and Immobilizing Companies Bylaw No. 11-033.

Count 16

On or about December 18, 2019, JOHN MUELLER dba I-TOW GROUP, failed to have a business name and telephone number painted or otherwise permanently affixed to the sides of a vehicle used to carry on the business of towing or immobilizing improperly or unlawfully parked vehicles, contrary to Section 16 of the City of Victoria Towing and Immobilizing Companies Bylaw No. 11-033.

Count 17

On or about December 18, 2019, JOHN MUELLER dba I-TOW GROUP, charged fees other than or greater than the prescribed fee for towing of a motor vehicle that was improperly or unlawfully parked contrary to Section 8(1) of the City of Victoria Towing and Immobilizing Companies Bylaw No. 11-033.

Count 18

On or about December 18, 2019, JOHN MUELLER dba I-TOW GROUP, failed to prominently display a schedule of the fees which may be charged at each place of business and each lot where vehicles towed for being improperly or unlawfully parked are stored, contrary to Section 8(6) of the City of Victoria Towing and Immobilizing Companies Bylaw No. 11-033.

Count 19

On or about December 18, 2019, JOHN MUELLER dba I-TOW GROUP, failed to issue proper receipt including time and location of when and where a vehicle was connected to a towing vehicle, contrary to Section 13(1)(b) and (c) of the City of Victoria Towing and Immobilizing Companies Bylaw No. 11-033.

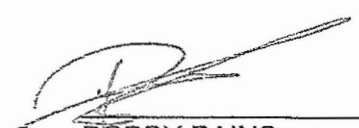
Count 20

On or about December 19, 2019, JOHN MUELLER dba I-TOW GROUP, charged fees other than or greater than the prescribed fee for towing of a motor vehicle that was improperly or unlawfully parked contrary to Section 8(1) of the City of Victoria Towing and Immobilizing Companies Bylaw No. 11-033.

**SWORN (OR AFFIRMED) BEFORE ME**


at the City of Victoria, in the Province of  
British Columbia, this 11th day of  
March 2020

  
A Justice of the Peace in and for the  
Province of British Columbia

  
BOBBY BAINS

SUMMONS TO ISSUE,

  
SUMMONS  
CONFIRMED

  
A Justice of the Peace in and for the  
Province of British Columbia