



This is the 1st Affidavit
of Jagdip Mann in this case,
and was made on February 23, 2026

NO. S-261027
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

AMIR ALI ARHAMI

PLAINTIFF

AND:

SOUTH COAST BRITISH COLUMBIA TRANSPORTATION AUTHORITY

DEFENDANT

AFFIDAVIT

I, Jagdip Mann, of 400 – 287 Nelson’s Court, in the City of New Westminster, in the Province of British Columbia, AFFIRM AND SAY AS FOLLOWS THAT:

1. I am the Senior Advisor, Revenue Contracts & Fare Infractions, at the South Coast British Columbia Transportation Authority (“**TransLink**”) and, as such, I have personal knowledge of the facts and matters contained herein, except for those facts said to be based upon information and belief, and where so stated, I verily believe them to be true.
2. I swear this affidavit in support of a response to application filed by the defendant on or around February 23, 2026.

TransLink

3. TransLink is the authority continued under the *South Coast British Columbia Transportation Authority Act*, S.B.C. 1998, Chapter 30, (the “**Act**”) that is responsible for managing and operating the regional transportation system in the Metro Vancouver area.
4. The regional transportation system is a system, in the Metro Vancouver area, that transports passengers and goods, and includes ferries, cycling path networks,

custom transit services, bus transportation services, rail transportation services, designated projects and the major road network.

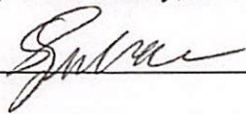
5. TransLink is the owner or occupier of certain infrastructure and lands (together, the "**Transit Property**") to operate certain of its transit services.. For example, to operate SkyTrain services, TransLink owns or occupies certain Transit Property, including, among other things, SkyTrain stations (the "**Stations**" or singularly a "**Station**").
6. Every Station is different, but basically they all have fare gates that a person must use to both enter and exit the Station. In order to open a fare gate for a person to validly pass through, a person must "tap-in" by tapping at the fare gate an accepted fare product, being a Compass card, Compass ticket or a payment card (this includes certain physical debit or credit cards or such cards that are stored on a mobile device that can be used through a device's digital wallet) (the "**Accepted Fare Product**"). If a person does not already have an Accepted Fare Product, or does not have sufficient funds associated with such product, when they come to the Station, a person can purchase a Compass ticket from ticket vending machines located outside the fare gates. Then the person can "tap-in" with their Accepted Fare Product at the fare gate and it will open to allow them to enter the Station.
7. Once the person has passed through the fare gates, they are in a "fare paid zone". That is, a zone within which a person must have paid sufficient fare and must possess valid proof of payment of such fare at all times.
8. The "fare paid zone" is always clearly marked with signage. There is signage outside the fare gates making it clear that a person passing through the fare gates is entering a "fare paid zone".
9. Once in this fare paid zone, the person is then able to walk or take an escalator or elevator to the SkyTrain platform where they can get on a SkyTrain to ride it.
10. When the person gets off of a SkyTrain they will be in another Station. They then must make their way to the fare gates at that Station to leave the Station. Thus, they continue to be in a fare paid zone until they exit through the fare gates. To exit the fare gates, they must "tap-out" by tapping the same Accepted Fare Product that they used to enter the fare paid zone. By "tapping-out" with the same Accepted Fare Product, the fare gate opens and allows them to pass through.
11. Unfortunately, sometimes some people do not follow the rules (and the law) and get through the fare gates without paying the required fare. Sometimes people will just aggressively push their way through the fare gates. Sometimes they will climb up and over the fare gates. Sometimes, people will follow another person very closely and they will get through the fare gates when the person ahead of them taps to open the gates. Sometimes people will pay for a discounted ticket or pass (called a Concession fare) that is meant for certain eligible persons such as youth or seniors, even when

the person is not themselves a youth or senior. Sometimes people will use a non-transferrable discounted program pass that is meant for certain eligible persons such as certain students.

12. TransLink does not have employees at every single fare gate at every single Station, every hour of the day. Instead, TransLink uses the services of fare officers, being designated transit security officers and transit police officers, to periodically check if people have paid the required fare.
13. Again, every Station is different but fare officers will generally enforce the fare requirements by requesting to inspect any Accepted Fare Products that people are using to travel on the regional transportation system. Fare officers may stand near the fare gates to check that persons passing through the gates are paying the proper fare.
14. When a fare officer discovers that a person has not paid their required fare, including when the person cannot present any Accepted Fare Product, cannot present an Accepted Fare Product that has been "tapped-in" to enter a fare paid zone or presents a fare product that they are not eligible to use, then the fare officer may issue a fare infraction ticket to that person or may provide educational information to that person. In addition to fare infraction tickets, transit police officers have the ability to issue provincial violation tickets to the person in certain circumstances, including if the person is wilfully obstructing a fare officer in their exercise of the powers and duties or if the person misuses a fare gate, all as set out more particularly in the Greater Vancouver Transit Conduct and Safety Regulation.
15. In addition to the ticket vending machines outside the fare gates, there are some ticket vending machines inside the fare gates. This is for a couple of reasons. First, sometimes when a person has only paid for a one or two-zone trip but then they have travelled two or three zones, respectively, the ticket they are using will not allow them to exit. They will have to go to the machine to pay the additional sum necessary to complete their trip. Also, sometimes a person may lose their ticket in the middle of their trip, so they must purchase another one to carry for the remainder of their trip and to exit through a fare gate at their end Station.
16. Over the years, TransLink has lost revenue to persons who have not paid their fare or who have purchased discounted concession fares, when they are not eligible to purchase the discounted fares and should instead be purchasing the full price adult fare. TransLink relies on people paying their required fare as one method to generate funding to provide and maintain transit services.
17. Fare revenues are essential to funding and improving the transit system for everyone.

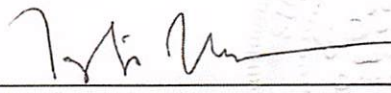
18. All revenues recovered from issuing fare infraction tickets to persons who have not paid their fare or paid the correct amount, are designed to deter people from not paying their required fare and are used to help pay for fine administration, dispute resolution services and collection costs or otherwise re-invested into the transit system.

AFFIRMED BEFORE ME at New)
Westminster, British Columbia, this 23rd)
day of February, 2026)


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A commissioner for taking Affidavits)
for British Columbia)

Susan Grabovac
Barrister & Solicitor
400-287 Nelson's Court
New Westminster, BC V3L 0E7
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JAGDIP MANN

