

March 19, 2025

VIA EMAIL: Genevieve.Scharback@brampton.ca

Genevieve Scharback

City Clerk

The Corporation of the City of Brampton

2 Wellington Street West

Brampton, ON L6Y 4R2

Dear Ms. Scharback:

RE: ANNUAL REPORT – 2024 (the “Report”) – Integrity and Ethics Commissioner, City of Brampton

Background

My role as the Integrity and Ethics Commissioner is established under Part V.1 of *the [Municipal Act, 2001](#)*. As the Integrity and Ethics Commissioner for the City of Brampton, I am responsible for overseeing the application of the [Council Code of Conduct](#) and related bylaws, rules, and policies governing the ethical behavior of Members of Council. In practical terms, this mandate includes several core duties:

- **Application of Codes and Policies:** Administering the Code of Conduct for Members of Council (and local boards) and ensuring compliance with applicable City policies and procedures on ethical behavior. This also entails interpreting and applying provisions of the *Municipal Conflict of Interest Act* (“**MCIA**”) as they relate to Council members.
- **Investigations of Complaints:** Receiving, assessing, and where appropriate, investigating formal complaints alleging breaches of the Council Code of Conduct or other ethical violations by Members of Council. I have discretion to determine whether an inquiry is warranted in each case, in accordance with the [City’s Complaint Protocol](#) and the authority granted by the *Municipal Act*.

- **Providing Advice and Education:** Providing advice to individual Council members (and members of local boards) on their obligations under the Code of Conduct, City policies, and the MCIA, upon request. I also serve an educational role by informing Council, local boards, City staff and the public about the standards of ethical conduct expected of elected officials. This includes answering inquiries about the scope of my jurisdiction and the interpretation of the Code and the MCIA, as well as developing educational materials or training as needed.

These responsibilities are carried out independently and at arm's length to uphold integrity and accountability at City Hall. The purpose of this Annual Report is to provide a summary of the complaints and matters addressed by my office in 2024, along with updates on other key initiatives undertaken during the year.

Summary of Complaints in 2024

In 2024, my office received several complaints and inquiries from the public relating to the conduct of Brampton's elected officials. These included four formal complaints under the Council Code of Conduct, three informal complaints, and one out-of-jurisdiction complaint. Below is a summary of each matter, including the nature of the complaint, dates, any investigative steps undertaken, and the outcome in each case:

1. **Complaint re: Councillor Violating Property Standards (Formal Complaint):** On January 31, 2024, my office received a formal complaint by a City of Brampton Property Standards Officer regarding the conduct of a Councillor in relation to a property. The complainant alleged that the Councillor had violated the Council Code of Conduct in two ways: (a) by failing to maintain a property he owns at 123 Queen St. West in accordance with property standards (raising concerns under Rule No. 13, *Respect for the City and its By-laws*), and (b) by engaging in intimidating or interfering behavior toward a City enforcement staff member (raising concerns under Rule No. 16, *Conduct Respecting Staff*). The complaint detailed that the Councillor's property had been in a state of serious disrepair, with multiple by-law violation notices issued, and that the Councillor's communications to the complainant (the officer enforcing

those notices) were perceived as threatening – including accusing the complainant of “harassment” and threatening to file a complaint against him in retaliation.

Investigation & Findings: I conducted a full investigation into the complainant’s allegations, which included reviewing property inspection reports, communications between the Councillor and City staff, and giving the Councillor an opportunity to respond. A formal report of my findings was completed and provided to Council on October 2, 2024. In summary, the investigation found insufficient evidence to conclude that the Councillor breached the Code of Conduct. On the property standards issue, while the property was clearly in poor condition, the evidence did not demonstrate that the Councillor willfully neglected compliance – he had made efforts to address the issues, and the property was owned through a corporation with multiple directors, complicating responsibility. On the staff conduct issue, the investigation determined that the Councillor’s responses to the complainant (though confrontational) did not cross the threshold to be considered intimidation or an attempt to improperly influence staff in the exercise of their duties. There was no clear evidence of an abuse of office or a serious undermining of staff’s ability to enforce the law. Accordingly, the conclusion of the October 2, 2024 report was that the Councillor did not violate Rule 13 or Rule 16 of the Code as alleged. No sanctions were recommended. The [report](#) was received by Council, and the complainant was informed of the outcome that no breach was substantiated.

2. **Complaint re: Director of Peel Region (Outside of my Jurisdiction):** A complainant filed a complaint (dated July 9, 2024) alleging misconduct by a Regional official (a Director at Peel Region) and others. She forwarded this complaint to my office on July 17, 2024, after originally submitting it to the provincial Integrity Commissioner. Upon preliminary review, it was determined that this matter fell outside my jurisdiction, since it concerned employees of the Region of Peel rather than a Member of Brampton City Council.

Review & Outcome: Under the *Municipal Act*, a municipal Integrity Commissioner's authority is limited to the conduct of their own municipality's Council members and local board appointees, whereas the Region of Peel has its own Integrity Commissioner for regional officials. Accordingly, I declined to investigate this complaint and advised the complainant to redirect her concerns to the Peel Integrity Commissioner's Office. A closing letter explaining this decision was sent to the complainant on July 22, 2024. In that letter, I outlined the jurisdictional limits of my role and noted that pursuing an out-of-scope complaint would not be an appropriate use of City resources. This matter was therefore closed with no inquiry undertaken by my office, beyond referring the complainant to the proper oversight body.

3. **Complaint re: Suppression of Sexual Assault Case (Informal Complaint):** A complainant sent me an email on August 14, 2024, alleging wrongdoing by two Councillors and a City Staff member. Specifically, the complainant alleged suppression of her sexual assault case due to a Councillor's improper influence with Peel Regional Police, retaliatory conduct, abuse of power, and obstruction of justice. My office responded to acknowledge receipt of her email on August 19, 2024. A formal complaint was never filed by the complainant.

While assessing the merits of the complainant's email, my office received, and was copied on, an influx of emails from the complainant. This pattern of excessive and hostile correspondence led me to determine that the complainant's actions were frivolous and vexatious. Directly below is a high-level summary of the complainant's emails directly sent to me (or copying me) between August 2024 and January 2025.

Summary of Complainant's Email Timeline and Conduct:

- **August 14, 2024:** Email from the complainant received to my office providing a chronology of events relating to their complaint.
- **August 16, 2024:** Follow-up emails sent by my office to the complainant regarding format of supporting documents and accessibility of same.

- **August 19, 2024:** Acknowledgment of documents by my office.
- **September 2, 2024:** The complainant sent email to my office making accusations of "continued corruption and toxic masculine energy" against City of Brampton and Peel Police, allegations of being "harassed" due to familial issues, with threats of suing the City.
- **September 6, 2024:** The complainant sent me and various other parties an email alleging privacy breaches, making statements such as "Are you kidding me here folks?" and accusing the recipients, including my office, of identity theft and other crimes. The complainant further stated, "Not sure how you sleep at night," and expresses extreme distress and emotional instability, writing, "YOU CANT HURT ME ANYMORE THAN I HAVE ALREADY BEEN HURT".
- **September 9, 2024:** Multiple aggressive emails sent by the complainant, including abusive language toward several named individuals, referring to them as "[REDACTED] stupid," "[REDACTED]," and asserting knowledge of being surveilled and retaliated against.
- **September 10, 2024:** Additional emails sent by the complainant, continuing with highly charged language, threats of class action lawsuits, and accusations of widespread corruption without substantiation.
- **September 16, 2024:** The complainant again sent emails alleging "retaliation" and demanding action, using abusive language toward city officials and police, stating, "Integrity commissioners? Abuse of power? HELLO???? Would you all just do your [REDACTED] jobs!" and accusing city council members of being complicit in alleged abuses against her.
- **October 1, 2024:** The complainant continued to email me regarding accusations of defamation and harassment, including statements discrediting city staff and council members, reiterating allegations of misconduct without credible supporting evidence.

- **January 15, 2025:** The complainant's final email directly targeted my office, alleging complicity in harassment and abuse, asserting intentions to seek legal action against my office, labeling staff as "part of the problem" for allegedly suppressing her concerns, further reinforcing the pattern of hostile and ungrounded accusations.
- **February 24, 2025:** The complainant left me an abusive and hostile voicemail message citing all of the cases and lawsuits she was embroiled in and naming private parties whom she had sued. Among other things, the complainant stated:
 - "I just want to let you know, I'm being extorted now by lawyers";
 - "Okay, you're all participating in gang stalking, cyber bullying, hate crime against me because I'm pointing out that things aren't fair. And they were fair before, but in my case, [REDACTED] (?) gets a building, [REDACTED] (?) gets, uh, funding every year for doing nothing, and [REDACTED], the white conductor with the most [REDACTED] talent, do you have any idea my experience and expertise?"
 - "I realize you're not as intelligent as me"; and
 - "You guys all just defend each other anyway. I don't know. Probably Human Rights Commission. That's probably where I'm going. [REDACTED], eh, for what you guys did to me. You can all [REDACTED] And don't worry, I'm recording it too. I know exactly what I'm saying. Women like you who disappoint other women who've been assaulted, there is a special place in hell for you."

Review & Outcome: Based on this pattern of behavior, including the extensive volume of emails, often containing threatening language and unsubstantiated allegations, I determined, pursuant to the City of Brampton's Complaint Protocol (Section 3), that the complaint should not be investigated because it is frivolous and vexatious. The complainant has consistently displayed conduct through repeated emails that are abusive, accusatory, and indicative of a confrontational and

ungrounded approach, rather than a genuine and constructive intention to seek redress or resolution. Given the tone, content, and persistent misuse of city resources through excessive and hostile correspondence, an investigation was not warranted, nor was a response necessary, as having engaged with this informal complaint any further would not have been prudent use of City resources.

4. **Complaint re: Councillors Allegedly Advocating for Removal of Unhoused Individuals in Social Media Group (Formal Complaint):** A complainant filed a formal complaint on June 14, 2024 regarding the actions of two Councillors in a neighborhood WhatsApp group discussion. The complaint centered on a WhatsApp group in which matters about the removal of unhoused individuals from local parks were discussed. The complainant alleged that the Councillor, through their participation in that group chat, had violated multiple provisions of the Code of Conduct – including General Conduct (Rule 1), Confidential Information (Rule 3), Improper Use of Influence (Rule 7), Transparency (Rule 9), Harassment (Rule 14), Discreditable Conduct (Rule 15), and Code Implementation (Rule 20). The complainant further alleged that a message by another Councillor in the same chat also breached those rules.

Review & Outcome: I conducted a thorough review of the extensive WhatsApp chat transcript provided (spanning from November 2020 to June 2023) and the context of the statements attributed to the two Councillors. After analyzing the content against the Code’s provisions, I found that the allegations were not substantiated – in other words, the evidence did not demonstrate any actual Code of Conduct violation by either Councillor in the group chat discussions. With respect to one Councillor, while they participated in conversations about clearing encampments of unhoused people, there was no clear misconduct that rose to the level of a Code breach. Their communications did not reveal any misuse of confidential information, unlawful influence, or harassment/discriminatory intent, etc., as was alleged. Any opinions expressed or actions taken were not found to contravene the cited rules in substance.

Regarding the other Councillor, the complainant supplied only a single message from that Councillor as evidence. In that message, the Councillor acknowledged the complexities of the homelessness situation and advocated for a coordinated, humane response – a tone which was professional and compassionate, not discreditable. There was no sign of any unethical behavior by that Councillor in the context given; the remarks did not disclose confidential information, nor did they constitute harassment or improper influence. Based on the absence of any demonstrable Code violation, I exercised my discretion to take no further action on this complaint. A detailed closing letter was sent to the complainant on November 4, 2024, explaining the findings for each of the cited Code provisions and why the evidence did not meet the threshold for a breach. In sum, the complaint was dismissed with no Code infractions found on the part of the two Councillors.

5. Complaint re: Councillor's Comments and Engagement Regarding Encampments (Formal Complaint):

A complainant filed a formal complaint with my office on July 6, 2024, concerning the same subject matter as the complaint referenced in paragraph 4. The complainant provided further supporting documentation on July 26, 2024. In comparing the complaint's content with the previously reviewed complaint by the complainant referenced at paragraph 4, significant parallels were evident. Both complaints revolved around alleged misconduct by the same Councillor within the same WhatsApp group, specifically concerning discussions about unhoused individuals residing in parks along the Etobicoke Creek trails.

The allegations presented by the complainant closely mirrored those raised by the complainant referenced at paragraph 4, asserting violations of several rules within the City of Brampton's Council Code of Conduct.

Both complainants provided largely the same screenshots of text messages as evidence, wherein the Councillor notably expressed frustration over delays from Human Services and regional authorities.

Review & Outcome: Given the similarity in content, nature, and the lack of substantiated evidence demonstrating any breach of the cited rules, my office dismissed the complaint. A closing letter was subsequently sent to the complainant.

6. **Inquiry re: Councillors Allegedly Referring to Landlords as “Slum” Landlords**

(Informal Complaint): A complainant contacted my office on September 26, 2024 with a complaint concerning alleged comments by Councillors referring to some landlords in Brampton as “Slum” landlords. On September 27, 2024, my office sent the complainant the formal Council Code of Conduct complaint form and information on the complaint process, inviting him to detail his allegations in the proper format. When no form was returned, a follow-up email was sent on October 4, 2024, inquiring if he wished to proceed. The complainant ultimately did not file a formal complaint.

Outcome: Given the lack of a formal complaint, I was unable to advance any investigation and the file was closed. A closing letter was sent to the complainant on October 9, 2024 to confirm that the matter was concluded without an inquiry (since the complainant chose not to pursue the formal process).

7. **Complaint re: Councillor’s Social Media Post (Formal Complaint):** On October 19, 2024, a complainant filed a formal complaint regarding a Councillor’s conduct on social media. The complainant alleged that a Councillor had engaged in discreditable behavior online, contrary to Rule No. 15 (Discreditable Conduct) of the Code of Conduct. In particular, the complaint cited two instances: (1) defamatory remarks that the Councillor allegedly made about federal MP Pierre Poilievre on social media, and (2) a situation in which the Councillor publicly insulted the complainant in response to a critique that the complainant posted online.

Review & Outcome: I undertook a review of the Councillor’s social media posts provided by the complainant and assessed whether the cited conduct might constitute a breach of Rule 15. It is important to note that determining *defamation* is outside the scope of the Integrity and Ethics Commissioner’s role (defamation is a

legal matter for the courts); therefore, my review focused strictly on whether the Councillor's alleged comments fell below the standard of conduct expected of a Council member. Rule 15 requires members to conduct themselves with decorum and refrain from behavior that would bring Council into disrepute. After analysis, I found that while the Councillor's online remarks (particularly the reply to the complainant) may have been sarcastic or unbecoming in tone, they did not reach the level of a Code violation under Rule 15. The posts in question did not significantly undermine the integrity of Council or the City's reputation; in other words, they were not so egregious as to constitute "discreditable conduct" in breach of the Code. I also reiterated that any allegations of defamation would need to be dealt with through the courts, not via the Code of Conduct process. Given these findings, I concluded that no further action was warranted. A closing letter dated January 31, 2025 was provided to the complainant conveying that decision and the reasons for it.

8. Inquiry re: "Potential Irregularities" at the City of Brampton (Informal Complaint):

A complainant contacted my office via email in November 2024 regarding what he described as "potential irregularities in the City of Brampton". In an email dated November 10, 2024, the complainant outlined a series of concerns. A large part of the email concerned the City of Brampton's decision to build indoor tennis courts at Rosalea Park. After reviewing his email, I responded to the complainant to clarify my mandate and jurisdiction. I informed the complainant that my office can only investigate matters involving possible Code of Conduct violations by Council members, and not general complaints about City administration. I advised that if any portion of his concerns involved a Council member's conduct under the Code, he should formalize those allegations using the official complaint form. The complainant replied on November 11, 2024, indicating he wished to discuss the procedure by phone. My office promptly provided him with the Council Code of Conduct Complaint Form (sent November 11, 2024) and offered to assist him with any questions about the process. We also made ourselves available for a phone call to guide him through filing a complaint, if he chose to proceed.

Outcome: The complainant did not submit a completed formal complaint form or any further details to substantiate a Code violation. A closing letter was sent to the complainant highlighting that no further action would be taken by my office.

Other Work Undertaken in 2024

Advisory Work

Outside of the complaints detailed above, my work as Integrity and Ethics Commissioner in 2024 included various proactive initiatives and ongoing advisory duties.

I continued to be available to Members of Council for ethics advice and education throughout the year. On various occasions, Councillors sought guidance on whether certain prospective actions or situations would comply with the Code or trigger obligations under the MCIA. While this Annual Report does not catalog those confidential advice interactions, providing timely advice is an important part of the Integrity and Ethics Commissioner's function. I also liaised with the City Clerk and Senior staff on ethics training and governance matters as needed.

Monitoring Best Practices

Furthermore, my office monitored emerging best practices in municipal ethics (including materials from the Ontario Ombudsman and legislative developments) to ensure our advice and interpretations remain current.

Code of Conduct Amendments –Proposed

One of the key projects in 2024 was the review and updating of the Council Code of Conduct for the City of Brampton. The current Code of Conduct was originally adopted in 2016 and had not been substantially updated since. Under Council's direction (through the City Clerk's office), I undertook a process to modernize the Code, address gaps, and incorporate best practices from other jurisdictions. This work is part of ensuring that Brampton's ethical framework for Council remains robust and "fit for purpose." Below is an overview of the proposed amendments:

- **Expanded Scope to Local Boards and Committees:** The revised Code would explicitly extend its application to members of local boards and Council committees when they are performing their official duties. This closes a gap by holding those appointees to similar ethical standards as Council members, in line with practices in other cities and section 223.3 (1) of the *Municipal Act*.
- **Updated Legislative References:** The Code’s preamble and framework should reference additional pertinent legislation, such as the *Occupational Health and Safety Act* (“**OHSA**”), *Ontario Human Rights Code* (“**OHRC**”), *Public Inquiries Act*, and others. By listing these statutes, the Code underscores that members must also adhere to broader legal obligations (e.g. harassment-free workplace requirements under the OHSA and the OHRC) as part of maintaining ethical conduct.
- **New Definitions Section:** To improve clarity, several key terms should be defined in the Code. For example, “**Local Boards**” and “**Committees of Council**” should be defined to support the proposed expanded scope of the Code. “**Social Media**” should be defined broadly to encompass platforms like Twitter, Facebook, Instagram, YouTube, etc., as interactive web technologies used to share information. “**Pecuniary Interest**” should be defined by reference to its meaning in the MCI, ensuring consistency. A definition of “**Harassment**” should be included, describing it as unwelcome vexatious comments or conduct, etc., aligning with human rights standards. “**Lobbyist**” should also be defined to support the proposed new lobbying rule (see Rule 19 below). Having these definitions embedded will assist members and the public in interpreting the Code’s provisions.
- **Strengthening of Gift and Benefit Rules:** I propose adding a clear table or guidelines for allowable gifts (similar to models used in Toronto and Mississauga) to Rule 2 of the Code. The aim is to clarify the monetary limits and types of gifts and benefits that members may accept, to prevent conflicts of interest. This would make the gift provisions more “user-friendly” and transparent. (For example, a chart of allowable gift values and required disclosure could be introduced, as a best practice.) This

recommendation was influenced by comparative research and feedback for more clarity in this area.

- **Updating of “Rule No. 1 General” to “Rule No. 1 Conflict of Interest”:** For clarity, I propose that the “General” rule be retitled to “Conflict of Interest” as this better suits and captures the content and intent of Rule No. 1
- **Introduction of New Rules:** The following new rules are proposed to address areas not explicitly covered in the 2016 Code. These are:
 - **Rule 18: Social Media Conduct.** Given the growing importance of online communication, I propose drafting a new rule to govern Councillors’ behavior on social media platforms. In essence, Rule 18 states that all the same standards of conduct apply online – posts by a Council member are treated as public statements, and members must not engage in disrespectful, harassing, discriminatory, or misleading communications on social media. Members are expected to communicate in a constructive and transparent manner; anonymity or misrepresenting one’s identity as a public official is prohibited. Members must comply with the City’s Use of Corporate Resources policy when using social media in an election context. This new Social Media rule would help ensure that the Code of Conduct fully extends to the digital sphere, promoting civility and integrity in how Members interact online.
 - **Rule 19: Conduct Respecting Lobbyists.** To complement Brampton’s Lobbyist Registry system, a new lobbying-related rule is proposed. Rule 19 would require that Members of Council only engage with registered lobbyists (as per the City’s Lobbyist Registry By-law) and refrain from any lobbying activity themselves that circumvents the rules. In practice, this means if a Councillor realizes someone lobbying them is not properly registered, they should suspend the conversation and advise the person to register (and report the incident to the Lobbyist Registrar). This would reinforce accountability and

transparency in interactions with external influencers and supports the integrity of the decision-making process.

- **Rule 20: Fundraising Activities.** This proposed rule establishes guidelines for Members of Council when they are involved in fundraising efforts (for community events, charitable causes, etc.). It mandates utmost transparency in any fundraising a member is associated with and prohibits Councillors from handling funds directly or controlling financial transactions for external organizations. For example, donation cheques should not be made out to a Councillor or to the City; and if a Councillor is organizing a community fundraiser, they would be required to report all donations and donors above a certain threshold to my office. The rule's intent is to prevent conflicts of interest and ensure no perception that a member could benefit (whether financially or politically) from a fundraising activity. This new section, once adopted, will provide clearer ethical guidance for situations that fall outside election campaign financing but still involve raising money or resources.

It is my view that Council's adoption of these amendments (in whole or in part) would strengthen the City of Brampton's ethical governance framework going forward. I will continue to work with Council in 2025 to finalize and implement these proposed Code updates. This comprehensive Code review was a significant focus in 2024, aimed at ensuring our Code of Conduct rules remain current, clear, and effective in promoting ethical behavior at City Hall.

Conclusion

It has been my honour to serve as Integrity and Ethics Commissioner for the City of Brampton this past year. The year 2024 presented challenging issues and important opportunities to enhance the City's ethics framework. I am pleased to report that all complaints were handled in accordance with my mandate, and where issues fell outside my jurisdictional scope, I endeavored to guide residents to the proper channels. The initiatives to strengthen

our Code of Conduct are well underway, and I believe they will have a lasting positive impact once adopted.

Moving forward, I remain committed to providing the highest standard of service in this role – through impartial investigations, sound ethical advice, and continued education on integrity in public office. I wish to thank the Mayor and Councillors, City staff, and members of the public for their cooperation and engagement with the Office of the Integrity and Ethics Commissioner in 2024. I look forward to continuing to build a culture of integrity at the City of Brampton in the year ahead. Please feel free to contact my office with any questions about this Report.

Sincerely,



Muneeza Sheikh

Integrity and Ethics Commissioner
The City of Brampton