

April 1, 2026

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 – 2025 (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 MCI, 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 MCI, 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 2025, along with updates on other key initiatives undertaken during the year.

Summary of Complaints and Inquiries in 2025

In 2025, my office received several complaints and inquiries from the public relating to the conduct of City Council members and/or other municipal employees. These included three formal complaints under the Council Code of Conduct, one of which was subsequently withdrawn by the complainant, and three informal complaints or inquiries (none of which resulted in the filing of a formal complaint). My office also provided confidential advisory opinions to a Member of Council on two occasions regarding obligations under the MCI. 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: Tamil Genocide Monument (Formal Complaint)

On June 4, 2025, my office received a formal complaint from a complainant regarding a Councillor's conduct in connection with the Tamil Genocide Monument at Chinguacousy Park in Brampton. The complainant alleged that the Councillor had violated several provisions of the Council Code of Conduct by endorsing and facilitating the installation of the monument, making public statements regarding the Sri Lankan conflict, and using his office to promote what the complainant characterized as a separatist agenda. The

complainant referenced what he identified as Rule No. 1 (Key Principles), Rule No. 2 (General Integrity), Rule No. 11 (Conduct at Meetings), and Rule No. 17 (Respect for Brampton’s Diverse Community). The complaint was accompanied by several links to media articles and social media posts.

Review & Outcome:

I conducted a thorough review of the complaint and the supporting materials submitted by the complainant. I determined that the complaint could not proceed to investigation for a number of independent reasons. First, all of the Code of Conduct provisions cited by the complainant do not exist in the City of Brampton’s Council Code of Conduct. Most notably, the complainant referenced “Rule 17 (Respect for Brampton’s Diverse Community),” which is not a provision of the Code; Rule No. 17 addresses Employment of Council Relatives and Family Members. “Rule 2 (General Integrity)” and “Rule 11 (Conduct at Meetings)” do not exist. Second, the substance of the complaint fell outside my jurisdiction, as it raised questions of federal law, international law, and historical interpretation that are not matters within the Code of Conduct. This file was subsequently closed.

2. Complaint re: Alleged Improper Disclosure of Personal Information (Formal Complaint)

On December 2, 2025, my office received a formal complaint from a complainant and resident of Brampton, Ontario. The complaint was dated August 5, 2025. The complainant alleged that a Councillor had violated several provisions of the Code of Conduct, including Rule No. 3 (Confidential Information), Rule No. 7 (Improper Use of Influence), Rule No. 15 (Discreditable Conduct), and Rule No. 16 (Conduct Respecting Staff), by sharing the complainant’s confidential personal information with a family member without consent while the complainant was a member of the Councillor’s staff. The conduct at issue was noted to have occurred on or before November 30, 2021.

Review & Outcome:

The Complaint Protocol explicitly provides that the Integrity Commissioner shall not accept any complaint that arises from conduct which occurred (or was first learned of by the complainant) more than six months prior to the complaint being received. In this case, the complaint was filed well beyond the six-month limitation period. Although the complaint was dated August 5, 2025, it was not shared with my office until December 2, 2025. The conduct described took place approximately four years earlier, in November 2021. Even using the date of the complaint letter as the filing date, the events in question occurred far outside the permitted six-month window. Accordingly, in line with subsection 1(4) of the Complaint Protocol, I was unable to accept or investigate the complaint due to the significant lapse of time. A closing letter was provided to the complainant on December 11, 2025, explaining this decision. No investigation was undertaken and no further action was taken. This file is closed.

3. Complaint re: Speed Cameras (Formal Complaint – Withdrawn)

On September 23, 2025, my office received a complaint from a member of the public regarding the conduct of two Councillors. The complaint form was prepared and provided to the complainant for execution. On September 30, 2025, the complainant advised my office that they wished to withdraw the complaint.

Review & Outcome:

Considering that the complainant withdrew their complaint, no investigation was undertaken. A closing letter was provided to the complainant explaining this determination. This file is closed.

4. Complaint re: Alleged Breach of Confidentiality / MFIPPA (Informal Complaint – Withdrawn)

On October 27, 2025, my office received a detailed email from Wesley Jackson of Brampton, Ontario, alleging that a Councillor had improperly disclosed the complainant's identity as a requester under the *Municipal Freedom of Information and Protection of Privacy Act*

(“MFIPPA”) to a third party. The complainant alleged that, on the same day he filed an MFIPPA request with the City, his identity as the requester was disclosed to a private individual, as evidenced by a social media post identifying the complainant by name and referencing the substance of his request. The complainant alleged this disclosure contravened the Code of Conduct’s confidentiality provisions, which encompass personal information protected by MFIPPA.

Review & Outcome:

On November 14, 2025, my office acknowledged receipt of the email and requested that the complainant complete and return the formal complaint form, as required by the Complaint Protocol. On December 2, 2025, the complainant wrote to advise that he wished to withdraw the informal complaint, indicating that he had instead directed the matter to the Province’s MFIPPA office, which he believed had broader jurisdiction to investigate. Accordingly, no investigation was undertaken by my office. This file is closed.

5. Inquiry re: Construction Site Safety Concerns (Informal Complaint)

On September 13, 2025, a complainant emailed the Integrity Commissioner’s office regarding an unsafe construction site at 67 McCaul Street in Brampton. The complainant indicated that he had been in contact with City staff over several months regarding the site, but had not received adequate responses, and believed he was being ignored. The complainant sought the Integrity Commissioner’s assistance in resolving the matter.

Review & Outcome:

My office responded on September 14, 2025, acknowledging receipt of the email and explaining that the Integrity Commissioner’s office requires an official complaint to be filed. The complainant was provided with the formal complaint form and directed to the Council Code of Conduct, with an explanation that the Integrity Commissioner’s jurisdiction extends to members of City Council and members of local boards. The complainant did not submit a completed formal complaint form or identify any specific Code of Conduct provision

allegedly contravened. As the concerns raised appeared to relate to City operational and enforcement matters rather than the conduct of a Member of Council under the Code, and no formal complaint was filed, no further action was taken. This file is closed.

6. Inquiry re: Councillors' Missed Community Meeting Commitment (Informal Complaint)

On October 23, 2025, a complainant emailed the Integrity Commissioner's office regarding the conduct of two Councillors. The complainant alleged that both Councillors had confirmed their attendance at a community meeting scheduled for October 23, 2025, but cancelled their attendance at the last minute, offering instead to conduct door-to-door outreach at a later date. The complainant felt this constituted a breach of the Code of Conduct with respect to transparency, accountability, and respectful treatment of the public.

Review & Outcome:

My office responded on October 24, 2025, acknowledging receipt of the email and advising the complainant that we could review the complaint on its merits if the complainant were able to identify how the conduct violated any specific rule under the Council Code of Conduct. The complainant was provided with the formal complaint form and a link to the Code. The complainant did not submit a completed formal complaint form or further correspondence identifying any specific Code provision. While I appreciate the frustration that can arise when community engagement expectations are not met, the rescheduling of a community meeting does not, on its face, engage the provisions of the Code of Conduct. No further action was taken. This file is closed.

7. Inquiry re: Alleged Selective By-law Enforcement (Informal Complaint)

On November 12, 2025, a complainant emailed the Integrity Commissioner's office alleging that he had experienced repeated and targeted by-law complaints against his property since approximately 2017. The complainant alleged that a neighbour with connections to City staff was responsible for the complaints, and that this raised concerns about possible improper

use of influence by a Member of Council, conduct respecting staff, and use of municipal property and resources. The complainant did not identify any specific Member of Council as a respondent.

Review & Outcome:

My office responded on November 13, 2025, acknowledging receipt of the email and providing the formal complaint form. The complainant acknowledged receipt but did not submit a completed formal complaint form or provide further particulars identifying the Member of Council allegedly involved. Without the identification of a specific respondent Member and a completed complaint form, my office was unable to proceed. The concerns raised also appeared to relate primarily to City enforcement practices rather than the conduct of a Member of Council under the Code. No further action was taken. This file is closed.

Other Work Undertaken in 2025

Advisory Work

Outside of the complaints detailed above, my work as Integrity and Ethics Commissioner in 2025 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 two occasions in October 2025, my office provided confidential advisory opinions to a Member of Council regarding obligations under the MCIA. Both inquiries concerned potential pecuniary interests arising from the Member's family circumstances. After reviewing the relevant facts against the provisions of the MCIA, my office advised that a pecuniary interest (whether direct or indirect) must be disclosed when the matter arises at a Council meeting, and that the Member must not participate in or influence the discussion of any matter in which the interest is engaged. My office further advised that pre-emptive disclosure is not required under the MCIA, but that if a matter pertaining to the interest comes before Council or a committee, the Member must declare

the conflict and recuse themselves from that portion of the proceedings. These opinions were provided in accordance with my mandate under section 223.3(1)(c) of the *Municipal Act, 2001*, which authorizes the Integrity Commissioner to provide advice to Members of Council on their obligations under the Code of Conduct, City policies, and the MCIA.

While this Annual Report does not catalogue all confidential advice interactions, providing timely and accurate advisory opinions remains 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

My office continued to monitor emerging best practices in municipal ethics throughout 2025, including materials from the Ontario Ombudsman, guidance from the Information and Privacy Commissioner, and relevant legislative developments. This ongoing work ensures that my advice and interpretations remain current and aligned with evolving standards across the province.

Conclusion

It has been my honour to serve as Integrity and Ethics Commissioner for the City of Brampton this past year. The year 2025 presented a variety of complaints and inquiries, each of which was assessed and handled in accordance with my mandate. Where complaints fell outside my jurisdiction or did not meet the requirements of the Complaint Protocol, I endeavored to guide residents to the proper channels and provide clear explanations for the disposition of their matters.

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 2025. 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