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# **CODE OF CONDUCT COMPLAINT 2022-01 INTEGRITY COMMISSIONER REPORT**

## **THE CORPORATION OF THE TOWN OF PETROLIA**

**Aird & Berlis LLP**  
**Daria (Dasha) Peregoudova**

**June 10, 2022**

## **INTEGRITY COMMISSIONER REPORT CODE OF CONDUCT COMPLAINT 2022-01**

### **I. INTRODUCTION**

1. A formal complaint was filed with the Integrity Commissioner on January 6, 2022 (the “**Complaint**”) alleging that Mayor Brad Loosley (the “**Mayor**”) of The Corporation of the Town of Petrolia (the “**Town**”) contravened the Town’s Code of Conduct for Members of Council & Local Boards (the “**Code**”).

2. Specifically, the Complaint alleged that the Mayor contravened Article 5, Subsection 10 of the Code, the *Municipal Act, 2001* and “in camera meeting rules” following a Closed Session meeting of Council on December 13, 2021 when he disclosed confidential information to *The Independent* as reflected in an article dated December 17, 2021 entitled “Petrolia fire chief’s job changes after her went to OPP with concerns about Souch” (the “**Article**”).

### **II. APPOINTMENT & AUTHORITY**

3. Aird & Berlis LLP was appointed as Integrity Commissioner for the Town pursuant to subsection 223.3(1) of the *Municipal Act, 2001* and by Council by By-law No. 11-2019 on March 11, 2019. Council adopted the Code and its associated Code of Conduct Complaint Protocol, being Schedule B to the Code (the “**Complaint Protocol**”) on May 13, 2019 by By-law No. 34-2019.

4. As Integrity Commissioner, we have been appointed and assigned all of the functions set out under subsection 223.3(1) of the *Municipal Act, 2001*, including that we act in an independent manner on the application of the Code, and other rules and procedures governing the ethical behaviour of members of Council. We are required to preserve secrecy in all matters that come to our knowledge as Integrity Commissioner in the course of our duties. The Town is required to ensure that reports received from the Integrity Commissioner are made available to the public.

5. The Complaint was properly filed in accordance with Section 2(1) of the Complaint Protocol, being the Town’s Formal Complaint Procedure. We further determined that the Complaint did not appear to be frivolous or vexatious, and that it fell within our jurisdiction as Integrity Commissioner and subsection 223.4(1) of the *Municipal Act, 2001*.

6. This is a report on the investigation of the Complaint made in accordance with Section 11 of the Code and subsection 223.6(2) of the *Municipal Act, 2001* (the “**Report**”).

7. The principles of procedural fairness require us to provide reasons for our conclusions and recommendations, which we have done in this Report. Our investigation was conducted in accordance with the Complaint Protocol and with a process that was fair to all parties. We have assessed the evidence in an independent and neutral manner.

8. We have provided an opportunity to the Mayor to respond to all of the allegations set forth in the Complaint, and to review and provide comments on our preliminary findings and conclusions. The Mayor did so on June 9, 2022.

### III. CODE OF CONDUCT PROVISIONS AND RELATED RULES AT ISSUE

9. The Complaint alleged that the Mayor contravened Article 5, Subsection 10 of the Code, which provides as follows:

#### ARTICLE 5 - CONFIDENTIALITY

10. No Member shall disclose or release by any means to any member of the public, any confidential information acquired by virtue of their office, in either oral or written form, except when required by law or authorized by Council or the local board to do so.

10. Given the nature of the Complaint, we observed that Subsection 12 was also necessarily engaged:

12. No Member shall disclose the content of a matter that has been discussed at or the substance of deliberations of an in-camera meeting, except for content that has been authorized by Council, a Committee of Council or a local board to be released to the public.

11. The Complaint also alleged that the Mayor breached general “in camera meeting rules” and the *Municipal Act, 2001*. No specific closed meeting rules or provisions of the *Municipal Act, 2001* were cited.

### IV. REVIEW OF MATERIALS AND INTERVIEWS

12. In order to undertake our investigation and prepare this Report, we reviewed and considered the following materials:

- The Complaint and all attachments thereto;
- A clarification to the Complaint received on January 17, 2021 (hereinafter referred to collectively with the Complaint);
- The Mayor’s responses to the Complaint dated April 6 and 7, 2022, and a clarification provided at our request on April 27, 2022 (collectively, the “**Response**”);
- Agenda and Minutes of the November 22, 2021 regular meeting of Council;
- Agenda and Minutes of the December 13, 2021 regular meeting of Council;
- Unredacted and confidential independent investigation report prepared for Council by John Fleming dated November 7, 2021 (the “**Fleming Report**”);
- Press Release and Public Summary of the Fleming Report posted on the Town’s website on November 25, 2021 (the “**Public Summary**”);
- A confidential letter from the Mayor to a member of Council dated November 23, 2021 concerning the member’s admitted breach of confidentiality and unauthorized disclosure of closed session meeting information;

- Interviews conducted with Town staff on March 23 and 24, 2022; and
- Interview with Heather Wright of *The Independent* who authored the Article (“**Reporter**”).

13. We also reviewed such further materials that we considered appropriate to understand the context of the ethical framework and matters related to the Complaint.

## **V. BACKGROUND AND FACTUAL CIRCUMSTANCES**

### **(a) The Complaint**

14. As noted above, the Complaint alleged that the Mayor contravened Article 5, Subsection 10 of the Code, the *Municipal Act, 2001*, as well as in camera meeting rules following a Closed Session meeting of Council on December 13, 2021.

15. In particular, the Complaint alleged that the Mayor had disclosed confidential information to *The Independent*, as evidenced by the Article dated December 17, 2021 entitled “Petrolia fire chief’s job changes after her went to OPP with concerns about Souch”<sup>1</sup> which allegedly contained direct quotes from the Mayor containing confidential information.

16. The Complaint indicated that the Mayor had disclosed details of a situation concerning an employee that were contained in the confidential Fleming Report received by Council in a closed session on December 13, 2021, and that had not been otherwise disclosed to the public in the Public Summary released on November 25, 2021.

17. The Complaint stated that the Public Summary contained no exact actions or names, and on the contrary, specified that it contained confidential personnel matters, while the quotes attributed to the Mayor on the Article, by contrast, included the Fire Chief’s name, position and the details surrounding changes to his job duties.

18. The Complaint alleged that the breach had been intentional, a “blatant breach of trust and ethical standards” and “an undermining of the reputation and professional integrity of someone who holds an important and respected position with the Town.” The Complaint expressed concern that the alleged breach had occurred despite the Mayor having participated in a presentation to Council, including on the topic of confidentiality, and having received extensive training on the Code.

### **(b) Relevant and Related Facts**

19. In conducting our investigation and in reviewing the evidentiary record, we concluded that the following were clearly available facts:

- The Fleming Report was considered by Council in closed session on November 22, 2021, at which point Council also authorized the disclosure of the Public Summary which was ultimately released on November 25, 2021.

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<sup>1</sup> While the print version of the Article named Councillor Souch by name, the name of the Article was amended in its online version at an unspecified date to, “Fire chief’s job description changes after going to OPP with concerns about councillor”: <https://petrolialambtonindependent.ca/2021/12/17/fire-chiefs-job-description-changes-after-going-to-opp-with-concerns-about-councillor/>. When asked about the reason for the change of title, the Reporter indicated that the names of articles occasionally changed when there was not enough space.

- On or about the evening of December 14, 2021, the Mayor spoke with the Reporter of *The Independent* by telephone for an interview (the “**Interview**”). The initial main topic of discussion (which was confirmed by both the Mayor and the Reporter) was the Fire Chief’s Appointment By-law 64-2021, which had been on Council’s agenda the evening prior (the “**Appointment By-law**”).<sup>2</sup> Specifically, the Reporter made inquiries with the Mayor as to why the Fire Chief’s secondary title was changing from “Director of Protective Services” to “Director of Public Services”, including with respect to any accompanying information such as change in authority or duties.
- The Reporter published the Article the next day, with the following direct quotations attributed to the Mayor:
  - “Petrolia Mayor Brad Loosley says the fire chief’s job description is changing after he went to OPP saying Councillor Marty Souch may be watching employees of the town”;
  - “Loosley tells *The Independent* the change comes in the wake of the investigation by John Fleming into the incident which saw police tail Souch after a staff member went to police concerned a councillor was watching staff at work”;
  - “Loosley says the bylaw clarifies Arns position. ‘There’s a difference on his responsibilities now basically to be related to fire and crossing guards and parking tickets, that type of thing. And that’s where he will stop. So it won’t be all the other things that . What he was involved with – you know, that part of the idea of somebody following somebody and him getting involved with that’ he says”;
  - “*The Independent* asked the mayor if the fire chief ‘felt empowered’ to take action in the incident because his directorship included protective services. ‘That’s my understanding, yes,’ says Loosley”; and
  - “‘It was recommended by Fleming to do that. So he was just empowered under certain areas and not everything,’ says Loosley of the change.”
- Having read the Article the next morning after the Interview, the Mayor attended at City Hall and shared with several senior staff members that he was very upset by the Article’s contents, and believed that he had been misquoted (or that his comments had been taken out of context). The Mayor also contacted the Fire Chief to communicate his concerns on the contents of the Article, and informed the Fire Chief that he had not said what the Article had written.

20. In addition, we believe the following details and context are relevant for the purposes of our Report:

- We were made aware of a long-standing history concerning the leaking of confidential, in camera information to *The Independent*. Many of the recent incidents were specified as having involved one particular Council member, who was described by all witnesses as having a “rapport” and being a source to the Reporter and *The Independent*. The Council member in question had, in or around November 2021, come forward to the Mayor to

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<sup>2</sup> Agenda of Regular Meeting of Council, December 13, 2021, Pages 9 & 261. Online: <https://petrolia.civicweb.net/document/51150/>.

admit a breach of confidentiality on their part, despite earlier denials of same. In response, the Mayor took action against the member and requested that they recuse themselves from attending closed meeting sessions and in camera discussions, effective November 25, 2021.

- All Town staff that were interviewed expressed concern about the quality and accuracy of the reporting from *The Independent*, and the Reporter in particular. Specifically, it was indicated that articles often mis-paraphrased, exaggerated or stated incorrect facts and details, and targeted certain individuals. For example, a staff member disclosed that on one occasion, they were asked to provide information or a quote to the Reporter for the purposes of an article. Due to the fact that they were in a long meeting, they were not able to respond for approximately three (3) hours. The Reporter, allegedly, indicated that the staff member in question had “refused to comment” in the subsequent Article, whereas in the staff member’s opinion, they had simply not had enough time to respond. The staff member indicated that this placed them in a negative and inaccurate light. Such mischaracterizations were echoed by others in the course of our investigation. At worst, the reporting was compared to a “tabloid”.
- When interviewed, the Reporter confirmed that her current practice is to audio record her interviews using a recording device, instead of only relying on handwritten notes. The Reporter indicated that she did this, in part, because staff and others often challenge the accuracy of reporting when they do not like what it says. The Reporter indicated that in preparing her articles, she would later use the recordings, including to confirm the accuracy of artificial intelligence-based transcription technology. A staff member confirmed that the Reporter was often seen with her recording device.

21. The Mayor’s Response and related details can be summarized follows:

- The Mayor confirmed having spoken with the Reporter at approximately 9:00 p.m. on the evening of December 14, 2021 regarding the Appointment By-law.
- The Mayor indicated that while the Reporter’s questions initially concerned the Appointment By-law, her attention quickly turned to learning more information about the Public Summary, of which she already had a copy as of November 25, 2021 when it became available to the public. In particular, the Reporter asked questions regarding a quote from page 7 of the Public Summary, which stated that “a thorough review of job descriptions of key positions in the Town’s senior ranks may be merited.”
- The Mayor indicated that during the Interview, the Reporter continued to pressure him, “over and over”, to provide further information regarding the investigation conducted by Mr. Fleming and the full scope of his report, which she was “not happy to not have been given”. The Mayor stated that the Reporter did so through the use of “trick questions” instead of “regular questions”. The Mayor indicated that he provided responses to the best of his knowledge, including with respect to the Appointment By-law which was publicly on Council’s agenda on December 13, 2022.
- The Mayor believed, given the speed at which the Article was published following the Interview, that it had already been predominantly composed and its contents known to the Reporter. The Mayor shared that, in retrospect, upon seeing the Article, he believed he had been “set up”, which he believes to date.

- The Mayor was unequivocal that it was his sincere belief that he did not disclose or release any confidential information, and that his words were twisted in such a way as to make it seem as such. The Mayor pointed to his being distraught the next day upon reading the Article, and his comments to staff and the Fire Chief in support of his statements. These sentiments, including a belief that the Mayor had not divulged any confidential information, was shared by staff members that we spoke to during the course of the investigation.
- The Mayor indicated that he considered contacting *The Independent* to make a correction in the Article, but ultimately decided that “it would do more harm than good”.
- The Mayor expressed his disappointment and hurt at the Complaint and the situation at large, as he tries to be very careful in what he states to the newspaper. Further, the Mayor indicated that he was well aware of the rules and importance of preserving confidentiality, including with respect to the content of in-camera meetings, at all times. This sentiment was shared by staff members that were interviewed.
- Like others, the Mayor also brought to our attention the one councillor with a known close relationship to *The Independent* who had admitted to disclosing information from an in camera session, necessitating a disciplinary response from the Mayor.

## VI. PRELIMINARY MATTERS

### (a) Confidentiality of In Camera Meeting Information

22. This Complaint arises from matters considered in a closed meeting of Council. Information emanating from an *in camera* meeting is confidential information that is not to be publicly disclosed.<sup>3</sup> In fact, such information is typically safeguarded from public disclosure in various means, including pursuant to the *Municipal Freedom of Information and Protection of Privacy Act*<sup>4</sup> and under the Code itself. We therefore wish to comment regarding same.

23. First, the courts in Ontario have authorized the disclosure of closed meeting information in instances involving the enforcement of municipal accountability statutes.<sup>5</sup>

24. Second, while an Integrity Commissioner is bound to preserve secrecy with respect to all matters that come to their knowledge in the course of their duties, there is a significant exception set out in subsection 223.6(2) of the *Municipal Act, 2001*:

#### **Report about conduct**

**223.6 (2)** If the Commissioner reports to the municipality or to a local board his or her opinion about whether a member of council or of the local board has contravened the applicable code of conduct, the Commissioner may disclose in the report such matters as in the Commissioner’s opinion are necessary for the purposes of the report.

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<sup>3</sup> A recent investigation report from by integrity commissioner referred to the maintaining of closed meeting information as one of the “cardinal rules” that must be followed by members of council – see City of Orillia Integrity Commissioner, *Recommendation Report – Complaint against Councillor Jay Fallis*, (September 22, 2021) at para. 134.

<sup>4</sup> *Municipal Freedom of Information and Protection of Privacy Act*, R.S.O. 1990, c. M.56.

<sup>5</sup> See *Cameron v. Taylor* (1992), 10 O.R. (2d) 277 (Gen. Div.) and *Whitfield v. Steckley*, 2014 ONSC 1742.

25. We have carefully considered our responsibilities respecting confidentiality and our right to disclose and have sought to balance the two obligations. To that end, we have disclosed only what we believe is necessary to provide sufficient context and understanding for our reasoning and conclusions while protecting Council's closed meeting information as much as possible.

**(b) Recording of Interview and Proportionality of Evidence**

26. During our discussion with the Reporter in the context of our investigation, we requested a copy of her notes and/or audio recording from the Interview with the Mayor on December 13, 2021. It was relayed to the Reporter that the audio recording would be an important, and perhaps determinative piece of evidence with respect to this investigation, as it would allow us to unequivocally address whether the Mayor was accurately quoted in the Article, and whether or not he did in fact breach confidentiality and/or disclose in camera meeting information.

27. The Reporter refused to share the recording of the Interview with us for this limited review, including on a confidential basis, citing journalistic standards and rules. The Reporter indicated that we would need to obtain a court order in order to access the recording, which was particularly surprising in view of the fact that an article in *The Independent* on April 14, 2022 had noted that the newspaper "has not been contacted by the Integrity Commissioner to make a statement" with respect to the complaint against Mayor Loosley, seemingly implying that *The Independent* would be able to fully verify the true facts. Further, we were unable to find any official journalistic rules or standards that would disallow the Reporter to confidentially disclose the recording with us for the purposes of our investigation.

28. In any event, we are not of the view that seeking a court order for the release of the audio recording of the Interview is proportional in the context of the Complaint and for the purposes of our investigation nor that it was necessary for us to invoke the *Public Inquiries Act, 2009*<sup>6</sup> in order to subpoena the recording. In particular, we are aware that taking such actions would delay our investigation and this Report significantly, perhaps past the commencement of the blackout period under section 223.4(7) of the *Municipal Act, 2001*. Second, either process, even if approached with the utmost efficiency, would be costly, particularly given it may be opposed by *The Independent*. This would result in substantially increased costs, ultimately passed down to the taxpayer. Lastly, we are mindful that each scenario must be assessed in light of its facts, and action taken responsively.

29. For these reasons, we have elected not to subpoena or seek a court order for the production of the Reporter's recording of the Interview for the purposes of our Report.

**VII. ANALYSIS**

30. This part of our Report sets out our analysis of the findings regarding the allegations of the Complaint.

31. From our review of the publicly-available materials, including the Public Summary, the Appointment By-law, and the Agendas and Minutes of the November 22 and December 13, 2022 Council meetings, we concluded that the information contained in the Article's quotations attributed to the Mayor were not disclosed anywhere in those public materials, or elsewhere to

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<sup>6</sup> *Public Inquiries Act, 2009*, S.O. 2009, c. 33, Sched. 6. Such recourse is available to an Integrity Commissioner pursuant to s. 223.4(2) of the *Municipal Act, 2001*.



the best of our knowledge. While some of the quotations appear to be more speculative in nature (e.g. the Mayor stating, “that’s my understanding, yes” to the Reporter’s question on whether the Fire Chief felt “empowered” to take action because of the nature of his position and title), generally speaking, the information contained in the quotes arises from the unredacted and confidential Fleming Report received by Council in closed session on November 22, 2021. As such, to the extent the quotes are accurate, we find that they do contain closed meeting and/or confidential information not otherwise known, or fully known to the public.

32. Accepting that the quotes do contain confidential closed meeting information, the crux of the matter then becomes narrow, and can be summarized as follows: did the Mayor disclose confidential in-camera information, contrary to Article 5, Sections 10 and 12 of the Code, and if so, what is the appropriate remedy?<sup>7</sup>

33. The facts, contextual background, and evidence with respect to the Complaint, including the differing viewpoints and assessments offered by the Complainant, the witnesses and the Mayor only permit this matter to be decided on a balance of probabilities, taking into account the best available evidence (or lack thereof). It also necessitates a process of elimination, given the plausible alternative explanations both proffered by various parties, and available on the facts.

34. The first possibility which we would be remiss not to consider is whether the member of Council who had been previously “disciplined” by the Mayor on November 23, 2021 for admitted breaches of confidentiality had potentially provided the confidential information in question to *The Independent*. This is particularly plausible in light of the fact that the Fleming Report had been considered by Council on November 22, 2021, prior to said member being asked to recuse themselves from closed sessions of Council on a go-forward basis.

35. The Reporter indicated that she did not discuss the Appointment By-law or related matters with anyone but the Mayor in preparation of the Article. Correspondingly, no other party is quoted in the Article. It is not in dispute that the Mayor discussed these matters generally with the Reporter on December 13, 2021. While it is entirely possible and, in fact, probable that the other member in question did have discussions with the Reporter at a different time and could have divulged confidential information as they had admitted to doing in the past, there is not enough evidence for us to conclude that this or any other member uttered the specific quotes attributed to the Mayor in the Article, which is the unique issue in the present matter. As such, we cannot simply overlook the information contained in the quotations, despite the concerning and relevant information we have been made aware of with respect to the other member and their transgressions.

36. The second possibility we are forced to consider is whether the Reporter, either intentionally or unintentionally, misquoted the Mayor in the Article or misattributed statements to him. While we appreciate the gravity of this suggestion, we feel compelled to consider it given the information disclosed to us in the context of our investigation, as summarized earlier.

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<sup>7</sup> Our Report does not comment or make findings with respect to the alleged breaches of “in camera meeting rules” and the *Municipal Act, 2001*. Both of these allegations were unparticularized in that they did not make references to any particular rules, or sections of the statute. Furthermore, we find that the Code is complete and complimentary to the statutory requirements of the Mayor and Council members on the matter giving rise to the Complaint, and as such, general commentary on open/closed rules or the *Municipal Act, 2001* is not necessary.

37. In speaking with the Reporter, she stated that the quotes for the Article were taken directly from her discussion with the Mayor, as recorded on her device. One witness indicated that while the Reporter's paraphrasing was often inaccurate, that when she directly quoted a party, the quotes were "usually accurate".

38. It is difficult to conceptualize the Reporter engaging in such a serious breach of journalistic ethics as to intentionally misrepresent or misstate the Mayor's statements, which would potentially also jeopardize the integrity of *The Independent* at large. This is particularly so knowing that *The Independent* could be compelled to disclose the audio recording of the Interview via a subpoena or court order.

39. However, we are surprised, and forced to draw at least some adverse inference about the fact that the Reporter did not share the audio recording with us. We also believe that the context of the Interview is important. When asked about how the details in the quotes had come about, the Reporter indicated that when she spoke to the Mayor, he "did not lay it all out", that "he was aware of the confidentiality and restrictions", "was aware of the fact that he had to be careful" and had, in fact, been careful. The Reporter further indicated that she "poked and prodded" the Mayor for information, which is consistent with the Mayor's account of the Interview in his Response in which he expressed being asked "over and over" and was pressured into divulging information.

40. This is also consistent with the Mayor's Response in which he stated that he knows and understands the rules regarding confidentiality, and takes care to observe said rules. This is consistent with the evidence of other witnesses. While we are not suggesting that one's knowledge of a set of rules automatically indicates that one cannot breach them, this is important in light of mitigating and aggravating factors that must be weighed in this, and any, scenario.

41. The Reporter further indicated that given the Appointment By-law had been on the agenda the day prior to the Interview, the Mayor "felt a bit free-er [to discuss the matters in question]", but "ultimately said things he shouldn't have said". Frankly, the Reporter seemed somewhat gleeful that the Mayor may have stumbled after her persistent efforts to gain information during the Interview, which we find concerning given that it was clear to her that the Mayor was doing his best to preserve confidentiality.

42. Based on the evidentiary record, we cannot conclude that the Mayor acted maliciously, committed a "blatant breach of trust and ethical standards" or "an undermining of the reputation and professional integrity of someone who holds an important and respected position with the Town."

43. More accurately, we find, on the balance of probabilities, that the Mayor was likely caught up in trying to respond to the Reporter's persistent questioning and in providing information, including with respect to the Appointment By-law, he crossed a line into the contents of the Fleming Report, which was context not generally available to the public. Having done so, the Mayor committed, at most, an inadvertent breach of Article 5, Sections 10 and 12 of the Code.

44. We do agree with the Complainant that in the context of the very recent training provided to all members of Council with respect to confidentiality, and the fact that very shortly before, the Mayor had himself taken steps to address the very same issue with a different member of Council, that the Mayor could have spoken more carefully with respect to the subject matter at hand, and without disclosing any confidential information. We are not excusing such lapses in judgment, as momentary or rare as they may be for the Mayor and notwithstanding the fact that we have found the error to have been inadvertent.

## VIII. RECOMMENDATIONS

45. Subsection 223.4(5) of the *Municipal Act, 2001* and the Code both authorize the Integrity Commissioner to recommend, and Council to impose penalties on a member who has been found to have contravened the Code.

46. Having regard to the totality of our findings, and taking into consideration that the Mayor has no prior history of contraventions or complaints under the Code against him, we do not find a penalty to be warranted or appropriate in the circumstances and we do not recommend either to be imposed by Council.

47. Throughout the investigation process, and in his Response and comments provided on our draft Findings, the Mayor indicated that while he truly believed he had done nothing wrong, he would have no issue acknowledging any wrongdoing should it have occurred or be found by the Integrity Commissioner in this or any other scenario. We are also aware that having read the Article, the Mayor called the Fire Chief directly to explain the circumstances, and to apologize for any discomfort caused by the Article's contents. The Mayor informed us that the Fire Chief was receptive and fully accepted the Mayor's explanation and apology. As such, we do not believe that any further remedial steps are appropriate or necessary.

48. We do wish to caution the Mayor, as well as all members of Council, to remain steadfast in observing the rules regarding confidentiality enumerated in the Code, including with respect to closed session meeting contents, as breaches of said rules can warrant significant consequences.

## IX. CONCLUSIONS

49. For the reasons set out above, it is our conclusion based on the preponderance of the evidence that the Mayor committed no more than an inadvertent breach of Article 5, Sections 10 and 12 of the Code when providing information in the course of his Interview with *The Independent*. Such a transgression warrants no formal reprimand or monetary penalty.

50. This Report has been prepared for and is forwarded to Council for its consideration of the Recommendations set out herein.

51. Subsection 223.6(2) of the *Municipal Act, 2001* provides that this Report be made public.

AIRD & BERLIS LLP



Daria (Dasha) Peregoudova

Integrity Commissioner for the Town of Petrolia  
Dated this 10<sup>th</sup> day of June, 2022.