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May 1, 2025

**VIA EMAIL ([ccurtis@haldimandcounty.on.ca](mailto:ccurtis@haldimandcounty.on.ca))**

Mayor and Members of Council  
c/o Chad Curtis, County Clerk  
The Corporation of the County  
of Haldimand  
53 Thorburn St. S.  
Cayuga, Ontario  
N0A 1E0

Dear Mayor and Members of Council:

**RE: ANNUAL REPORT OF THE INTEGRITY  
COMMISSIONER, HALDIMAND COUNTY  
Our File No. 975-100**

I am pleased to submit my first annual report having commenced duties as your Integrity Commissioner effective February 14, 2024.

**Code of Conduct Complaints and Investigations**

I received 3 Code of Conduct complaints about Council members over the past year, involving seven different councillors.

I dismissed two of those complaints summarily without issuing a public report.

I allowed the third complaint in part, being the subject of Integrity Commissioner Report 2024-01 dated September 1, 2024. In that report, I found that Councillor Shirton had breached the Code of Conduct and recommended that he be directed to apologize to Mayor Bentley and Councillor Trainer, and dismissed complaints against four other Members of Council, being Mayor Bentley and Councillors O'Neill, Patterson, Lawrence and Metcalfe.

I did not receive any *Municipal Conflict of Interest Act* ("MCIA") complaints during this reporting period.

I currently have no COC or MCIA complaint investigations in progress.

**Requests for Advice**

I fielded two requests for advice from councillors, one concerning a potential conflict of interest related to a specific matter that was to be considered by Council and the second relating to a Member's obligations under the Code of Conduct.

**Gifts or Benefits Disclosure Statements**

I did not receive or review any Gifts or Benefits Disclosure Statements pursuant to ss. 8.4 and 8.5 of the Code of Conduct during this reporting period.

**Education and Training**

I conducted Code of Conduct and Municipal Conflict of Interest training for Members of Council at a Council meeting held on April 9, 2024. I will be conducting further Code of Conduct and Conflict of Interest training for new Members of Council on May 5, 2025.

**Code of Conduct Review and Update**

My office was asked by Clerk Curtis to review certain proposed changes to the County's Code of Conduct and to propose any additional amendments to the Code that we felt advisable. We undertook this review during October 2024 and provided our recommendations by letter to Clerk Curtis dated October 21, 2024.

**Cost of Integrity Commissioner Services**

The cost of my IC Services through the first year of my tenure (ending February 14, 2025) was \$20,875.00 plus HST. I note that approximately \$12,000.00 of this amount was related to the investigation and report on COC Complaint 24-01.

I trust this will be of interest to you. Please do not hesitate to contact me if you have any questions.

Yours very truly,



David G. Boghosian

DGB/dgb