



February 28, 2026

VIA EMAIL (ccurtis@haldimandcounty.on.ca)

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

Dear Mayor and Members of Council:

**RE: ANNUAL REPORT OF THE INTEGRITY
COMMISSIONER, HALDIMAND COUNTY
2025/2026
Our File No. 975-100**

I am pleased to submit my second annual report as your Integrity Commissioner.

Code of Conduct Complaints and Investigations

I received 4 Code of Conduct complaints about Council members over the past year, involving seven different councillors. They can be summarized as follows:

Complaint 25-001 – Complaint alleging that a Member of Council committed “election interference” in publicizing information about the Empire Communities MZO. The Complaint was dismissed following a brief investigation as disclosing no Code of Conduct violation;

Complaints 25-002, -003 and -005 - Complaints submitted by Haldimand County Council, Norfolk County Council and a private citizen regarding disclosure of confidential information on multiple occasions by Mayor Bentley, as well as an alleged breach of the MCIA. Code of Conduct violations found. MCIA Complaint dismissed. Cumulative penalty of 120 days’ suspension of pay recommended and imposed by Council;

Complaint 25-004 - Complaint regarding alleged violation of the *Municipal Conflict of Interest Act* (“MCIA”) on the part of a Member of Council in respect of voting on a matter in which he allegedly had a pecuniary interest. Complaint

summarily dismissed as disclosing no pecuniary interest and therefore no MCIA violation;

Complaint 25-006 - Complaint regarding the photographing of the computer screen of one Member of Council by another Member¹ during a Council meeting, which was alleged to have breached multiple sections of the Code of Conduct. Complaint dismissed following a brief investigation as disclosing no Code of Conduct breach;

Complaint 26-001 - Complaint regarding conduct of Member of Council during a Council meeting alleged to breach the Procedural By-law and constituted a lack of decorum under the Code of Conduct. Complaint summarily dismissed as disclosing no Code of Conduct violation.

I currently have one Code of Conduct/MCIA complaint investigation in progress, involving allegations against two Members of Council.

Requests for Advice

I fielded seven requests for advice from Members of Council over the previous 12 month period, five concerning potential conflicts of interest related to specific matters to be considered by Council and two relating to a Member's obligations under the Code of Conduct (regarding public communications about decisions of Council and the permissibility of statements made at a Council meeting, respectively).

I also fielded three inquiries from news media reporters regarding completed or ongoing investigations, and the Integrity Commissioner process generally.

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 two new Members of Council on May 5, 2025.

Cost of Integrity Commissioner Services

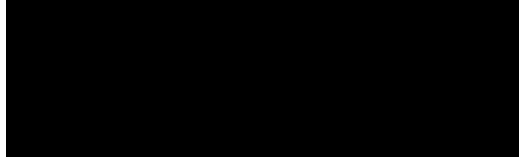
The cost of IC Services during the second year of my tenure (ending February 14, 2026) was \$49,793.00 plus HST. Approximately \$34,000.00 of this amount (exclusive of HST) related

¹ The Complainant was a member of the public, not the Member whose computer screen was photographed.

to the investigation and report on COC Complaints 25-002, -003 and -005 regarding the Mayor's Confidentiality Breach.

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

Yours very truly,

A large black rectangular redaction box covering the signature area.

David G. Boghosian

DGB/dgb