

HALDIMAND COUNTY INTEGRITY COMMISSIONER, DAVID G. BOGHOSIAN

Citation: Complaints re: Disclosure of Emails and Correspondence Relating to Boards of Health Merger– DGB-Haldimand County ICI-2025-05

Date: September 8, 2025

REPORT ON COMPLAINT

Introduction

[1] By Resolution made at its Council-in-Committee meeting on May 20, 2025, Haldimand County Council directed me to conduct an investigation into whether a member of Haldimand County Council leaked confidential information pertaining to the Brant County-Brantford/Haldimand-Norfolk Boards of Health merger which were briefly posted to a Facebook page called Dunnville Talks on or about February 28, 2025, the day after the Provincial election. The heading of the post read “Norfolk county staffer proving Amy Martin’s disdain for Haldimand county.” The CIC motion was confirmed at the May 26th meeting of Haldimand County Council. The Haldimand County Council Complaint did not name a specific Member to be investigated.

[2] I also received a Complaint forwarded to me by William Tigert, the Clerk of Norfolk County, concerning the same subject-matter. He explained in the Complaint he submitted that at a Special Meeting of Norfolk County Council, it had resolved to make a Complaint not only that Mayor Bentley had leaked the allegedly confidential documents forming the post in a manner that caused them to ultimately be posted to the Dunnville Talks Facebook page but also that Mayor Bentley breached confidentiality by providing these same documents to the Hamilton Spectator on or about May 26, 2025 and posted them on her official “Haldimand Mayor Shelley-Ann Bentley” Facebook page on or about the same date, which post remained up at the time of the Complaint.

[3] I finally received a Complaint from a member of the public whose anonymity I will maintain complaining that Mayor Shelley-Ann Bentley should have recused herself in respect of the County Council vote to refer a complaint about the leak of Board of Health merger documents on account of the fact that she had a conflict of interest pursuant to the *Municipal Conflict of Interest Act* (“MCIA”) given that (as asserted by the Complainant), Mayor Bentley had been responsible for disseminating the documents that were ultimately published in the Post and knew she would be investigated and ultimately penalized monetarily for so doing.

Applicable Legislative Provisions

Haldimand County Code of Conduct for Members of Council and Local Boards

[4] The relevant provisions of the Code of Conduct to be applied are as follows:

6. Confidentiality

6.1 Members shall not misuse confidential information such that it may cause detriment to the County, Council, board or others.

6.2 Members shall not 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, or by means of electronic technology, except when required by law or authorized by Council.

6.3 No Member shall use confidential information for financial or other gain, or for the financial or other gain of a family member or any person or corporation.

...

9. Conflict of Interest - Pecuniary Interest

9.1 Members of Council will recognize their obligations to follow and respect the provisions of the Municipal Conflict of Interest Act, R.S.O. 1990, c. M. 50. Members must publicly declare their direct or indirect pecuniary interest and file a statement of the conflict and the general nature of it with the Municipal Clerk, as soon as possible after becoming aware of the conflict.

9.2 In considering whether or not to declare a conflict, Members should be guided by the overall purpose of the Code. Members should consider whether the matter in question would meet the test of a pecuniary interest or a perceived pecuniary interest.

...

9.4 Members must refrain from influencing, discussing, or voting on a matter in which they have a pecuniary interest. Members should be aware of the exceptions to what constitutes a pecuniary interest as set out in the Municipal Conflict of Interest Act, R.S.O. 1990, c. M. 50.

9.5 Members shall leave the Council chamber when a debate or vote is to take place on a matter in which they have declared a direct or indirect pecuniary interest prior to the earliest of the commencement of the debate or vote, as the case may be.

Municipal Conflict of Interest Act (“MCIA”)

[5] The MCIA provides as follows:

5 (1) Where a member, either on his or her own behalf or while acting for, by, with or through another, has any pecuniary interest, direct or indirect, in any matter and is present at a meeting of the council or local board at which the matter is the subject of consideration, the member,

- (a) shall, prior to any consideration of the matter at the meeting, disclose the interest and the general nature thereof;
- (b) shall not take part in the discussion of, or vote on any question in respect of the matter; and,
- (c) shall not attempt in any way whether before, during or after the meeting to influence the voting on any such question.

[6] What constitutes a “pecuniary interest” is not defined in the MCIA but is defined in caselaw as meaning some form of monetary or financial gain.¹ The interest must be real and definable rather than hypothetical, the latter being insufficient to support an allegation that a Member will derive a pecuniary interest for MCIA purposes.²

The Glacis Investigation and Report to Norfolk and Haldimand Counties dated May 9, 2024 [sic]

[7] On Friday, February 28th, 2025, it came to the attention of Cathy Case, then the CAO of Haldimand County,³ that a public Facebook post contained photographs of correspondence between Haldimand and Norfolk County officials related to the recent merger of the Haldimand-Norfolk and Brant-Brantford Boards of Health.

[8] After seeking legal advice from Haldimand County’s external counsel, Cathy Case subsequently contacted and advised Al Meneses, CAO of Norfolk County, of the Dunnville Talks Facebook post. The two CAO’s agreed to initiate an investigation into what they both considered to be an improper leak of confidential information. Glacis Security and Investigations was consulted by external counsel for Haldimand County, Woody McKaig, and a request was made by him for Glacis to conduct the investigation.⁴

[9] The investigation was carried out by Gavin Horner, a former Toronto Police Services officer. His investigation consisted of conducting in-person and telephone interviews with multiple individuals, and his report contained an analysis of how and by whom the documents were leaked based on the information he had obtained through the investigation.

[10] The relevant conclusions of the Glacis Report were as follows:

- The documents were posted the day after the Provincial election. The documents were submitted for posting on the Dunnville Talks Facebook page on February 26, 2025 but because the poster requested anonymity which

¹ *Gammie v. Turner*, 2013 ONSC 4563 (CanLII) at [paras 26-27](#).

² *Gammie v. Turner*, 2013 ONSC 4563 (CanLII) at [para 57](#); *Rivett v. Braid et al*, 2018 ONSC 352 (CanLII) at [para 51](#).

³ Since unilaterally terminated from her position by Mayor Shelley-Ann Bentley exercising Strong Mayor Powers.

⁴ We have been provided with the email from Mr. McKaig to Glacis dated March 7, 2025 confirming this mode of retainer of Glacis.

required the group administrator's approval which was not immediately reviewed, the Post was not put up on the page until February 28th;

- Despite the fact that the Post was not posted until the day after the Provincial election does not detract from the obvious intention of the post, being to discredit Amy Martin, who was a candidate for the Provincial Conservative Party for the riding of Haldimand-Norfolk in that election;
- The content within the documents all had the same topic – the Health Unit merger. It is highly unlikely that the documents came from different sources. It is more likely that the same person printed all 4 documents;
- The November 6th Letter that was posted on Facebook indicates that it was printed on February 18, 2025;
- Kendle Columbus stated that in mid-February, she printed a group of emails relating to the Health Unit merger at the request of Mayor Shelley Ann Bentley. The letters forming the Post were attachments to the emails she printed and were included in the printouts she left with Mayor Bentley;
- “Caution” notices on the emails included in the Post indicated that the source of the leaked documents was on the Haldimand County side, not the Norfolk County side;
- The only persons who received the emails forming part of the Post on the Haldimand County side were Cathy Case and Mayor Bentley;⁵
- The documents posted on Facebook were printed by Kendle Columbus on behalf of Mayor Bentley;
- The Health Units' merger was completed in early December 2024. As of February 2025, the contentious issue of Haldimand County's participation on the Merger Committee, which was the subject-matter of the documents forming part of the Post, was no longer an issue. There does not appear to be an official or legitimate reason for requiring those documents to be printed out in February 2025;
- Through her legal counsel, Mayor Bentley declined to participate in the Glacis investigation unless certain conditions deemed by the investigator to be unacceptable were met;

⁵ The investigator does not note in the Conclusions but does elsewhere in the Report that while not an original recipient of the emails forming the Post, Kendle Columbus had access to them. It is also not noted in the Conclusions but is elsewhere in the Report that Haldimand's external legal counsel, Woody McKaig, and his assistant, Tammy Shanahan, also had access to the documents.

- The investigator concluded that, without Mayor Bentley’s participation in this investigation, there were several unanswered questions which he could not answer, including:
 - why Mayor Bentley asked for the documents to be printed;
 - who, if anyone, Mayor Bentley shared those printed versions with;
 - who took the photographs of the printed versions of the documents;
 - whether the documents were intentionally or accidentally leaked;
 - who else possessed the documents after Mayor Bentley had them printed until Mike Liscombe posted them on Facebook.
- Glacis thus concluded that they could not determine who at Haldimand County leaked the documents that formed the Post and whether the leak had been intentionally perpetrated.

May 20, 2025 Meeting of Haldimand County Council

[11] On May 20, 2025, Haldimand County Council, chaired by Mayor Bentley, considered the Glacis Report.

[12] Mr. Woody McKaig, external legal counsel for Haldimand County, was present for this meeting. The following is a summary of the discussion that occurred concerning the Glacis Report:⁶

- Cllr. O’Neill requested a breakdown of the Report;
- Mr. McKaig provided a brief review of the Glacis Report contents:
 - He stated that he considered the breach to be a “sensitive thing.” Mayor Martin’s concern was that Haldimand County’s November 5, 2024 letter had copied individuals from Brant and Brantford who were not directly involved in the Merger;
 - When he found out about the Post, he advised Ms. Case that it needed to be investigated;
 - The Investigation was briefly discussed at a Council Meeting six weeks ago but that not much information was shared regarding its scope because it was important to maintain confidentiality;

⁶ This starts at approximately 7:30:00 in the video of the meeting: https://pub-haldimandcounty.escribemeetings.com/Players/ISISStandAlonePlayer.aspx?ClientId=haldimandcounty&FileName=Council%20Chambers_CIC_2025-05-20-09-29.mp4.

- He stated that, although not stated directly in the Glacis Report, it was clear that Mr. Horner did not consider anyone interviewed as part of the investigation to have been the leaker;
 - McKaig advised Council that it had to determine whether the Glacis Report was “conclusive enough to do something about it” or if it was inconclusive. He thought that Council would have to believe that the Glacis Report was inconclusive.
 - If Council believes that the Mayor may have been involved in the Post, then Council could make a complaint to the Integrity Commissioner;
 - McKaig also presented Council with the option to request a “breach of trust” investigation by a judge,⁷ but advised against doing so. Instead, he recommended requesting an Integrity Commissioner investigation and briefly explained the process for such an investigation;
- Cllr. O’Neill asked whether the only evidence concerning who printed the documents included in the Report was from Kendle Columbus. The Councillor added that Ms. Columbus stated that she printed the impugned documents on February 18, 2025 [this was not in fact correct]. Mr. McKaig confirmed that was the only such evidence;
 - Cllr. O’Neill then asked Mayor Bentley whether she wanted to comment on why she did not participate in the Investigation. Mayor Bentley responded that she retained counsel because she does not like being followed by a private investigator, adding that she has been followed by an investigator for the past two and a half years.⁸ In conclusion, the mayor advised that she would participate in Integrity Commissioner investigation;
 - Cllr. Shirton thought that the leak originated from Haldimand County, adding that “there is only one answer” in reference to the leaker’s identity. Because of when the Post was made, he thought that the documents were leaked to discredit Mayor Martin’s candidacy and was in favour of an Integrity Commissioner investigation;
 - Cllr. Metcalfe commented that the only information Council knew with certainty was that the documents were posted on Facebook. He questioned how

⁷ Section 274(1)(a) of the *Municipal Act, 2001*, SO 2001, c 25 provides that a municipality may pass a resolution requesting that a judge of the Superior Court investigate any supposed breach of trust or other misconduct by a member of council, municipal employee, or any person having contact with the municipality.

⁸ During her examination under oath, the Mayor explained that she has been followed by a private investigator since she was elected mayor. Police have purportedly confirmed to her that the person following her is, in fact, a private investigator. The Mayor advised during her examination that she suspects that this private investigator was retained by the private developer, Empire Communities Inc., because of her public opposition to the Nanticoke Development Proposal, see: <https://www.haldimandcounty.ca/government-administration/studies-plans-and-projects/nanticoke-development-proposal/>.

the poster acquired the confidential information, suggesting that the Integrity Commissioner could answer that question;

- Cllr. Adams asked Mr. McKaig a series of questions:
 - Whether the duty of an investigator was to be full, frank, fair, honest, open, transparent, and impartial - Mr. McKaig agreed;
 - If the purpose of the investigation was to determine who made the Post - Mr. McKaig agreed;
 - Whether Mr. McKaig thought that the investigator “saw what he wanted to see and tailored the investigation towards that end”? - The impression Mr. McKaig had from speaking with Mr. Horner was that Mr. Horner did not do so;
 - Was Council aware that Glacis had been retained – Ms. Case confirmed that Council was informed via email that Haldimand and Norfolk jointly retained Glacis to conduct the investigation;
 - What was the cost of the investigation – Ms. Case advised that Haldimand County’s portion of the cost was \$4,800.00;
 - Whether, prior to the investigation, Ms. Case questioned anyone regarding the Post – Ms. Case stated that, after seeing the Post, she called Mr. Meneses of Norfolk County. She then called Mr. McKaig, who advised her to jointly investigate the Post with Norfolk County;
 - Was an Integrity Commissioner inquiry an option when Glacis was retained – In Ms. Case’s opinion, it was not. The Post stated that the source of the leak was a staffer. The Integrity Commissioner is only able to determine whether a Member has breached the Code of Conduct. The County’s Human Resources Department would respond if the leaker was an employee;
 - Whether Mr. McKaig agreed that Mr. Horner had “no evidence” regarding who released or photocopied the documents depicted in the Post – Mr. McKaig disagreed; Mr. Horner did state who photocopied the documents: Kendle Columbus. Mr. McKaig agreed that Mr. Horner had no evidence as to who photographed the documents, but that Mr. Horner does know who posted them. Mr. Horner also included denials from six other people and evidence from the respective IT departments that the documents were not otherwise copied in either County;
 - Are the denials of those interviewed to be taken at face value – Mr. McKaig opined that Mr. Horner went beyond simply accepting the denials on their face. He spoke to the IT departments for both Counties. There was nothing stopping someone from printing the documents outside of either County’s

IT system, but disagreed that there was “no evidence.” Mr. Horner interviewed all the potential suspects and concluded that the documents were not copied in Norfolk or in his law office. This meant that the documents were copied in Haldimand, but did not necessarily mean that they were posted from there, or that the Mayor was involved;

- Cllr. Adams said that he did not understand why his picture and references to a relationship of his were included in the Report or what the purpose of including such information was. Mr. McKaig said that such information was to demonstrate a relationship between the poster and the Mayor;
- Cllr. Adams then asked about the confidentiality of the documents and questioned whether they were, in fact, confidential given:
 - There is no marking nor stamp on the documents indicating that they were confidential;
 - The Councillor training he received after being elected to Council indicated that anything that occurs within Council chambers may be publicly disclosed, so long as it does not originate from an *in camera* session;
 - He questioned whether the documents were confidential because only five peoples’ names were redacted in the Report;
- Ms. Case clarified that all the attachments to the Report, including the letters, were redacted and remain confidential;
 - McKaig advised that determining whether something is confidential requires assessing its context and content. The purpose of the November 6, 2024 letter was to accuse Haldimand of improperly copying non-Committee members in correspondence about the Merger. Mr. McKaig said that the letters should have been marked “confidential”, but clarified that they did not become public documents simply because they were not marked “confidential”;
 - Cllr. Adams asked how Members should determine whether documents are confidential, adding that taxpayers are entitled to information from an open meeting;
 - Mr. McKaig said that he thought it was clear from the content of the letters that they were intended to be confidential and that they did not need to be marked as “confidential” for one to conclude as much;
- Cllr. Lawrence said that the issue is maintaining confidentiality and that an investigation is required to determine the source of the breach;

- Cllr. McKeen asked whether (1) an Integrity Commissioner investigation was the proper procedure and (2) whether Council was notified of the Glacis Investigation;
- Mr. McKaig provided a brief overview of the purpose and procedure of the Integrity Commissioner along with the scope of any resulting investigation;
- Ms. Case advised that Council was notified of the Investigation as soon as it began. She confirmed that Glacis did not perform any surveillance as part of the investigation;
- Cllr. O'Neill added some additional context regarding confidentiality. He noted that the letters were exchanged during Merger discussions and that the Merger was never discussed during open meetings. All such discussion occurred *in camera*.
- Council passed the following resolution:
 1. THAT the Report from External Legal Counsel on Confidentiality Matter be received and remain confidential;
 2. AND THAT the redacted GLACIS Report be moved to open session for consideration and discussion;
 3. AND THAT solicitor-client privilege be waived for this consideration and discussion.
 4. AND THAT Council put forward a Council Code of Conduct Complaint with the Haldimand County Integrity Commissioner, David Boghosian regarding the findings of the Glacis Confidential Report.

May 27, 2025 Hamilton Spectator Article “Haldimand Mayor denies wrongdoing in email leak”⁹

[13] This article states that Mayor Bentley is under scrutiny after confidential emails were allegedly leaked from her office and used to target Mayor Martin. It then proceeds to provide a similar history as that set out in the Glacis Report. Mayor Bentley provided a statement to The Spectator, distancing herself from the leak while also advancing the position that the documents should be made public, stating:

While I did not post the documents online originally, and I did not hand them to anyone who did, the reality is I do not believe the documents are, or should be, confidential.

⁹ J.P. Antonacci, “Haldimand mayor denies wrongdoing in email leak”, *The Spec* (May 27, 2025), online: < https://www.thespec.com/news/hamilton-region/haldimand-mayor-denies-wrongdoing-in-email-leak/article_f70e45a1-2888-5208-b847-2f6e9753072d.html>.

I will leave the legal conclusions to the integrity commissioner. However, if documents as mild as these are enough to cause multiple investigations resulting in shocking waste of taxpayer dollars, I question the usefulness of the process that led us here.

[14] The article goes on to state that Mayor Bentley shared the content of the emails depicted in the Post with The Spectator. According to the author, Mayor Bentley added that she wanted the emails to be made public so that the public could determine whether:

Multiple investigations costing thousands of taxpayer dollars, and dozens of hours of paid time from officials in both counties being wasted.

[15] Mayor Bentley went on to say that shielding the emails from the public was about protecting Mayor Martin's image rather than confidentiality concerns, stating:

The only remarkable thing about the documents is the way Mayor Martin acts in them...To me, that is the clearest indication why certain individuals fought to keep these documents out of the public eye, and to punish anyone they thought might have played a part in releasing them.

[16] The November 13, 2024 letter from Mayor Martin is published at the end of the article.

Integrity Commissioner Investigation

Overview of Investigation

[17] The Glacis investigator did an excellent job of identifying the relevant personnel to obtain statements from and asking the right questions to try to get to the bottom of who leaked the documents forming the Post. Rather than re-invent the wheel by re-interviewing these individuals at considerable time and expense, we drafted affidavits for each of these individuals to sign that tracked the content of the statements they reportedly gave to the Glacis investigator. In the vast majority of cases, the affiants agreed with what they had reportedly told Glacis and in the few other cases, only minor, insignificant corrections were made. We also obtained some additional information from those individuals and other individuals who Glacis had not spoken with. Most importantly, we examined under oath three parties who Glacis had not interviewed: Mayor Shelley-Ann Bentley; her spouse, Rick Beaudet; and the poster of the Post, Mike Liscombe.

Review of the Documents Forming the Post

[18] The 10 pages of documents comprising the Post were reviewed repeatedly and thoroughly by my office, including by myself. For reasons that will become apparent from a review of the Findings and Analysis section of this Report below, I do not summarize the content of these documents in this Report except as necessary for the narrative of the events covered by this Report.

Affidavits of Haldimand County and Norfolk County Officials

[19] The following individuals swore affidavits as part of this investigation:

1. Amy Martin, Mayor of the Corporation of Norfolk County and former Chair of the Haldimand-Norfolk Board of Health;
2. Al Meneses, Chief Administration Officer (“CAO”) of the Corporation of Norfolk County;
3. Nancy Patterson, Assistant to Al Meneses at Norfolk County;
4. Kendle Columbus, Executive Assistant to the Mayor and Council of the Corporation of Haldimand County;
5. Cathy Case, former Chief Administrative Officer (“CAO”) of the Corporation of Haldimand County (up until June 27, 2025);
6. Jerri Whiting, former Executive Assistant to Ms. Cathy Case (up until June 8, 2025);
7. Megan Jamieson, General Manager of Corporate Services (formerly titled Corporate and Social Services) with the Corporation of Haldimand County;
8. Mike Brousseau, Chief Information Officer (“CIO”) with the Corporation of Haldimand County;
9. Ryan McMahon, of Haldimand County, the Administrator and one of the Moderators of the Facebook group “Dunnville Talks”;
10. Woodward Bruce McKaig, a Senior Partner with the law firm Sullivan Mahoney LLP counsel for the Corporation of Haldimand County;
11. Tammy Shanahan, Legal Assistant to Mr. Woody McKaig

[20] The following constitutes an amalgamation of the content of their sworn evidence.

The Board of Health Merger

[21] During the latter part of 2024, Haldimand-Norfolk Health Unit and the Brant County-Brant Health Unit were negotiating a merger into a single public health unit (“the Merger”). This involved a series of confidential communications between the Merger Committee made up of a representative from the City of Brantford and Brant County, a representative of Norfolk County (Mayor Amy Martin) and the Mayor of Haldimand County, Shelley Ann Bentley. According to Mayor Martin, Mayor Bentley was included at Mayor Martin’s request to provide representation for Haldimand County on the Committee. A series of ongoing confidential communications were exchanged between the impacted municipalities, including at senior staffing levels, various special purpose and regular committee members, the various Boards of Health, and amongst elected officials.

[22] Confidential information about the Merger was reported to the Brant County-Brantford Board of Health and the Haldimand-Norfolk Board of Health and all discussions were held in

closed session. According to Mayor Martin, Sarah Page, General Manager of Health and Social Services with Norfolk County, also reported to Haldimand Council on more than one occasion in closed session to provide updates.

[23] Based on her attendance at meetings of Haldimand County Council, Megan Jamieson, General Manager of Corporate Services with Haldimand County, is aware that concerns were raised by Haldimand County senior staff and Council about whether Haldimand County was being adequately represented in Merger discussions. This led to a series of communications between the municipalities of Haldimand County and Norfolk County about the representation issue, starting with a letter from Mr. McKaig to the Haldimand Norfolk Board of Health dated November 5, 2024.

November 6th Letter

[24] On November 5, 2024, Mayor Martin received a letter from Mr. McKaig. It was addressed to her in her capacity as the Chair of the Haldimand-Norfolk Board of Health. Mayor Martin was of the opinion that this letter was sent to parties outside the scope of those who may receive confidential communication regarding the Merger.

[25] Mayor Martin drafted a response to Mr. McKaig on her computer using Microsoft Word, which she then sent to Mr. Meneses, who added Mayor Martin's letterhead and finalized her draft, affixed her signature and arranged for it to be sent to its intended recipients. According to Mayor Martin, the purpose of her letter was, among other things, to ensure that any correspondence regarding the Merger remained confidential.

[26] In her letter, Mayor Martin states that no person other than the Chair of the Haldimand-Norfolk Board of Health (i.e. her) is authorized to speak on behalf of the Board or communicate publicly regarding the Merger. The letter states that the November 5th letter was sent to parties that are outside the scope of those who may receive confidential communications regarding the Merger and advises that said letter contravenes Board protocols. It concludes by stating, among other things, that any correspondence regarding the Merger is to remain confidential. It was dated November 6, 2024. Prior to being sent out, it was not converted from a Word document into a Portable Document Format ("pdf").

[27] Ms. Jamieson received an electronic copy of this November 6, 2024 letter from Mr. Meneses by way of email as one of the seven (7) listed recipients. Mayor Martin was carbon copied on this email as an eighth recipient. The recipients were:

- a. Mayor Shelley Ann Bentley
- b. Ms. Cathy Case;
- c. Ms. Megan Jamieson;
- d. Mayor of the City of Brantford, Ken Davis;
- e. CAO of Brantford, Michael Bradley

- f. Mayor of the County of Brant, David Bailey; and
- g. CAO of Brant County, Alison Newton;

[28] Ms. Jamieson sent the November 6 letter in Word document format to Mr. McKaig on November 6, 2024. Mr. McKaig was the only person at Sullivan Mahoney LLP to whom she sent this letter. Tammy Shanahan, legal assistant to Mr. McKaig, does not recall receiving this November 6, 2024 letter, but had she been alerted to it, she would have saved or printed it, and placed it in the corresponding electronic or paper file, respectively.

[29] On November 8, 2024, Mayor Bentley and Ms. Case went to Norfolk County to discuss the content of the November 5 and November 6 letters. During the discussion, Mayor Bentley, Ms. Case, Mr. Meneses, Ms. Sara Page, and Mayor Martin were physically present. According to Mayor Martin and Mr. Meneses, the purpose of the meeting was to help Mayor Bentley understand what correspondence regarding the Merger must remain confidential and the responsibility that each party had to keep all documents involving the Merger negotiations confidential. Neither Mayor Martin nor Mr. Meneses recalls whether the November 5 and 6, 2024 letters were available in hard copy form at the November, 8, 2024 meeting. Aside from forwarding her November 6, 2024 letter to Mr. Meneses, Mayor Martin did not share it with anyone else.

November 13, 2024 Letter

[30] Mr. McKaig drafted a response to Mayor Martin's November 6 letter which was dated and sent on November 13, 2024 by his assistant, Ms. Tammy Shanahan. The only other person at Sullivan Mahoney who has access and who may have seen the November 13 letter is Ms. Shanahan. Mr. McKaig did not print, forward, or share the November 6 or 13 letters with anyone.

Completion of the Merger

[31] Mayor Bentley was subsequently removed from the Board of Health Merger Committee on November 20, 2024 and was informed of said removal by correspondence from Mayor Martin. Ms. Kendle Columbus believes, based on discussions with her, that Mayor Bentley was upset about being removed from the Committee.¹⁰

[32] On December 2, 2024, the Merger was completed, resulting in the creation of the Grand Erie Public Health Unit, without the participation of Mayor Bentley.

¹⁰ A letter dated November 20, 2024 from Mayor Martin, in her capacity as Chair of the Haldimand Norfolk Board of Health, addressed to Haldimand County Council removed Mayor Bentley from the Merger Committee and replaced her with a Member of the Haldimand Norfolk Board of Health. By email sent on November 28, 2024, Mayor Martin invited Mayor Bentley to attend the "verbal update" portion of the Merger Committee meeting scheduled for December 2, 2024. Mayor Martin advised that Mayor Bentley did participate and that this constituted Mayor Bentley rejoining the Merger Committee. As will be seen below, Mayor Bentley also asserted that she had been reinstated to the Merger Committee prior to the Merger.

2025 Provincial Election Campaign

[33] Mayor Martin ran as a candidate for the Progressive Conservative Party in the riding of Haldimand-Norfolk against the incumbent (Independent) MPP, Bobbi Ann Brady. Mayor Martin was announced as the candidate for said riding on November 29, 2024.

[34] On that same day, MPP Brady and Mayor Martin exchanged messages in the comments section of a post made to the Facebook group “Haldimand County Politics.” In response to a comment by a member and in reference to Mayor Martin, MPP Brady stated that “maybe the people of Haldimand need to know how she’s been trying to disadvantage them at a few tables she sits around. Time will reveal.” According to her, Mayor Martin responded to MPP Brady in a comment stating that she “needed to get her ducks in a row.” Mayor Martin states that MPP Brady then tagged Mayor Martin’s Facebook profile in a responding comment which stated “in a row indeed.”



Screenshots of the above-noted Facebook comments made by MPP Brady on November 29, 2024.

[35] According to Mayor Martin, the only tables that she “sat around” at the relevant time which would have affected the interests of Haldimand County residents were the Haldimand-Norfolk Board of Health and the Boards of Health Merger Committee. Mayor Martin believes that – given their friendship - MPP Brady was receiving information from Mayor Bentley regarding the alleged use of Mayor Martin’s role on the Merger Committee and the Haldimand-Norfolk Board of Health to “disadvantage” the interests of Haldimand County. Mayor Martin further believes that MPP

Brady was aware of her November 6 letter prior to it being made public based on the MPP's Facebook comments on November 29, 2024.

[36] Mayor Martin took unpaid leave from her duties as Mayor from January 29 to February 28, 2025 to run for Provincial office. While on leave, she did not have access to her County emails, laptop, cell phone, credit card and did not visit the Mayor's office.

Haldimand County Executive Assistants

[37] Jerri Whiting, then-Executive Assistant to the Chief Administration Officer of Haldimand County, did not have access to Ms. Case's County email inbox as part of her role as her Assistant. Ms. Case generally completed any required printing herself. Occasionally, she would ask Ms. Whiting to print a document or letter and would forward her the document in question.

[38] As part of her role as the Assistant to Mr. Meneses, Ms. Patterson is able to access his County email inbox. Despite this ability, Ms. Patterson does not actively monitor Mr. Meneses' emails or inbox. She only does so when explicitly requested by Mr. Meneses. It is her practice when sending emails on behalf of Mr. Meneses to include the line "on behalf of Al Meneses" in the respective emails.

Executive Assistant to Mayor Bentley

[39] As part of her role as executive assistant to Mayor Bentley, Ms. Kendle Columbus has access to Mayor Bentley's County email inbox. In mid-February 2025 (she cannot recall the exact date), Mayor Bentley asked Ms. Columbus to print a series of emails related to the Merger and the Mayor's removal from the Board of Health Merger Committee ("the Emails"). These Emails and their attachments included all of the documents which formed the post on the Dunville Talks Facebook page which is the subject-matter of this investigation.

[40] There were folders in the Mayor's County email inbox for various topics, including the Merger. When Ms. Columbus reviewed this particular folder while printing the Emails, it contained approximately 25 emails, some with attachments, in relation to the Merger.

[41] Over the previous few months, the Mayor had been routinely asking Ms. Columbus to print documents for her. Due to her preference to review documents in paper form rather than on a screen, the Mayor often requested that her documents be printed out. Accordingly, the request to print the Emails did not seem out of the ordinary to Ms. Columbus at the time. Ms. Columbus also printed other documents at that time, relating to other matters.

[42] Ms. Columbus sent the Emails from the computer at her desk to the printer in the Mayor's office. Ms. Columbus did not print all emails concerning the Merger, only those that Ms. Columbus considered relevant. Ms. Columbus skimmed emails related to the Merger for relevance and did not print any that were merely about scheduling; only those pertaining to substantive matters. When printing the Emails, Ms. Columbus also printed any documents that were attached to them.

[43] Once printed, Ms. Columbus cannot remember if she moved the printed Emails from the printer in the Mayor's office to the Mayor's desk or if the Mayor picked them up from the printer herself; if she was in her office, the Mayor often picks up her own materials from the printer.

Dunnville Talks Facebook Page

[44] "Dunnville Talks" is a group on Facebook that had approximately 13,000 members at the material time ("the Group"). There are three Moderators of the Group. Ryan McMahon is one of the Moderators and is the Administrator of the Group.

[45] Members of the Group may submit a request to post anonymously in the Group. Such requests are submitted to and must be approved by a Moderator. If an anonymous post request is approved, the post is immediately made to the Group. Other users will not be able to see the name of the user who made the post and Facebook will only display when an anonymous post was approved and posted, but not when the user originally submitted their post for Moderator approval. All Moderators may view the name of the user who requested and made an anonymous post, but not when the user originally submitted their request.

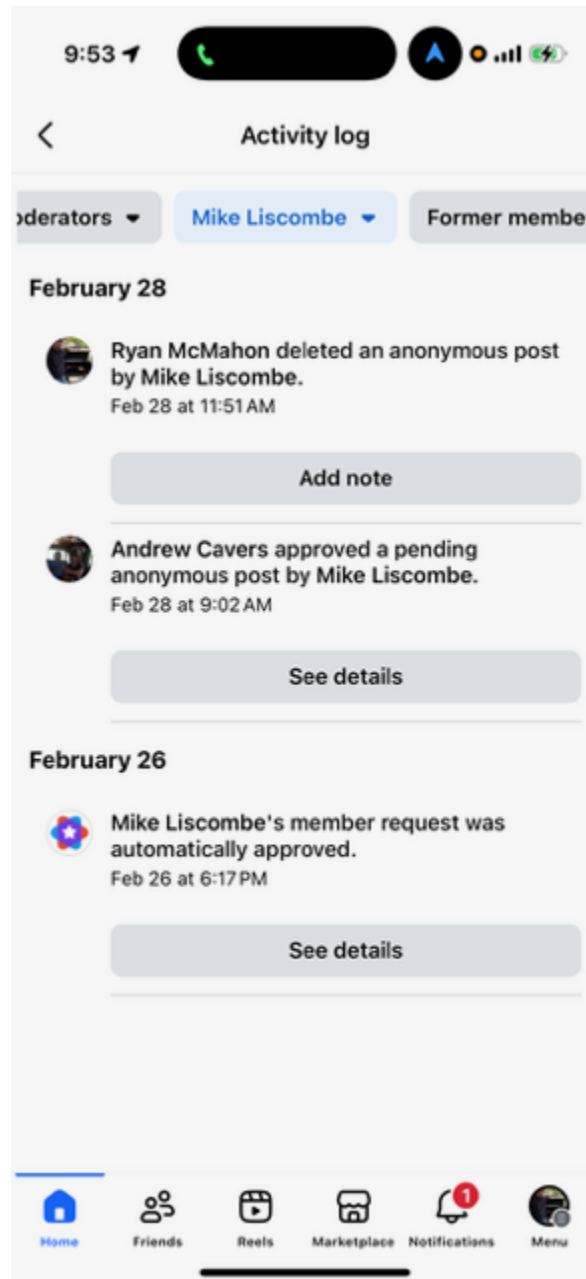
The Post

[46] On February 28, 2025, the day after the Ontario provincial election, an anonymous post was made to the Group entitled "Norfolk county staffer proving Amy Martin's disdain for Haldimand county" ("the Post"). The Post included ten photos depicting:

- a. The letter from Amy Martin in her capacity as Chair of the Haldimand-Norfolk Board of Health to the Mayor of Haldimand County, Shelley Ann Bentley, dated November 6, 2024;
- b. Email correspondence from Ms. Cathy Case, Chief Administrative Officer for Haldimand County, to Al Meneses, Chief Administrative Officer for Norfolk County, and Mayor Martin dated November 12, 2024;
- c. Email correspondence from Mr. Meneses to Ms. Case and Mayor Bentley dated November 13, 2024;
- d. Email correspondence from Mayor Martin to Mayor Bentley dated November 13, 2024; and
- e. A letter to Amy Martin in her capacity as Chair of the Haldimand-Norfolk Board of Health from Mr. Woody McKaig, counsel for Haldimand County, dated November 13, 2024.

[47] As soon as she discovered the Post, Ms. Case took a screenshot of it at 9:57 a.m. This screenshot indicates that the post was made 54 minutes earlier. From this, Ms. Case determined that the Post must have been published on the site a few minutes after 9:00 a.m. After taking the screenshot, Ms. Case contacted Mr. Meneses, and then Mr. McKaig.

[48] On that same day, Ms. Case contacted one of the Moderators of the Dunnville Talks FB Group, Mr. McMahon and asked him to remove the Post. Upon review, Mr. McMahon noted that the user who submitted the (anonymous) Post for review was Mr. Mike Liscombe. Mr. McMahon does not know Mr. Liscombe personally and did not advise Mr. Liscombe that he identified him to Ms. Case as the user who made the Post. Mr. Liscombe joined the Group shortly before submitting the Post for approval. Based on this, Mr. McMahon believes that Mr. Liscombe's sole purpose for joining the group was to make the Post.



Activity Log for Mr. Liscombe provided by Mr. McMahon

[49] Ms. Case's impression of the Post is that it was an attempt to negatively impact Mayor Martin's reputation in an effort to assist MPP Brady in the Provincial election. Mr. Meneses also holds that impression and believes that it may also have been made to discredit Mayor Martin as the Mayor of Norfolk.

[50] The following is how the various Affiants confirmed that they dealt with the Post and/or the documents depicted therein:

- a. Mayor Martin: "I did not forward, share or print and provide any of the correspondence depicted in the Post to anyone other than each of the intended recipients for same nor did I ask that anyone do so on my behalf."
- a. Mr. Meneses: "I did not forward, share or print any of the correspondence depicted in the Post nor did I ask Ms. Patterson to do so."
- b. Ms. Patterson: "I did not forward, share or print any of the correspondence depicted in the Post nor did Mr. Meneses ask that I do so."
- c. Mr. McKaig: "I did not forward, share or print and provide any of the correspondence depicted in the Post to anyone other than each of the intended recipients for same nor did I ask that anyone do so on my behalf."
- d. Ms. Shanahan: "I did not share the letters dated November 6 and 13, 2024 with anyone."
- e. Ms. Case: "On February 28, 2025, the day after the Ontario provincial election, while working from home, I became aware of a Facebook post to the group "Dunnville Talks" made by an anonymous user which stated "Norfolk county staffer proving Amy Martin's disdain for Haldimand county"."
- f. Ms. Jamieson: "On November 13, 2024, I sent the email from Ms. Case including all 4 documents in their original formats, to Mr. McKaig. He is the only person with whom I shared said email. I did not print this email nor any of the attachments."
- g. Ms. Whiting, Executive Assistant to the Chief Administration Officer: "Ms. Case did not forward to me or ask me to print any of the documents depicted in the Post.";
- h. Ms. Columbus: "I spoke to Ms. Case and asked to be given the chance to speak with investigators as part of the Investigation. I did so with a view to saving the County expenses associated with interviewing those who had access to the content depicted in the Post, as I had printed [such contents] at a material time, which I thought may be relevant to the Investigation."

The Investigation

[51] In or around March 2025, Mr. Woody McKaig, counsel for Haldimand County, retained Glacis Security and Investigations on behalf of both Haldimand and Norfolk Counties to conduct an investigation and determine how and by whom the documents included in the Post were leaked (“the Investigation”). The Investigation produced a Report signed off on by Mr. Gavin Horner and Mr. Mike Proska dated May 9, 2025 which is summarized above.

[52] Ms. Case and Mr. Meneses both sent identical emails to Haldimand and Norfolk County Councils, respectively, advising them of the Investigation in or around March 2025.

[53] In speaking with Mr. Horner, Mr. McKaig did not perceive his demeanour or investigative intent as being focused on affirming any preconceived notions as to who may have leaked the documents depicted in the Post. Mr. McKaig believes that Mr. Horner conducted an impartial investigation and that his impartiality is reflected in the rather conservative conclusions stated in the Report.

[54] Mike Brousseau, Chief Information Officer (“CIO”) with the Corporation of Haldimand County, assisted with the Investigation and was sent screenshots of the Post taken by Ms. Case from the investigators. Mr. Brousseau conducted searches of the Haldimand County email server for the documents that comprised the Post (“the Search”). The parameters for the Search were files that were printed between November, 1, 2024 and March 17, 2025. The Search was not able to find any printed files that shared the same subject line with the emails depicted in the Post. Despite the Search not being able to find record of a file sharing the same subject line, Mr. Brousseau could not state with absolute certainty that the emails depicted in the Post were not printed from a Haldimand County printer. Based on the Search, Mr. Brousseau could only conclude that no files with similar email subject lines were printed within its parameters.

[55] From his review of the Haldimand County email server, Mr. Brousseau stated that only four individuals accessed the emails depicted in the Post from Haldimand County:

- b. Mayor Bentley;
- a. Ms. Case;
- b. The General Manager of Corporate and Social Services, Megan Jamieson; and
- c. Kendle Columbus, executive assistant to the Mayor and Council

[56] Based on his review of the Search, Mr. Brousseau stated the emails depicted in the Post do not appear to have been forwarded. Mr. Brousseau advised that the Mayor’s printer is not on the Haldimand County central print server and does not keep a record of documents printed from it. Because it does not keep a record, there is no method by which to determine which documents were printed from the printer located in the Mayor’s office or when such documents were printed.

Ms. Columbus' Role During the Investigation

[57] While the Investigation was ongoing, Ms. Columbus saw an email from Ms. Case regarding the Investigation in the Mayor's County email inbox. This email noted that the Investigation had been commenced in relation to a breach of confidentiality from the release of printed documents. Ms. Columbus subsequently spoke to Ms. Case and asked to be given the chance to speak with investigators as part of the Investigation. Ms. Columbus states that she did so with a view to saving the County expenses associated with interviewing those who had access to the content depicted in the Post, as she had printed the Emails at a material time thought that they may be relevant to the Investigation.

[58] Ms. Case states that Ms. Columbus called her about the Investigation, stating that she had seen the email she sent notifying Council of it. Ms. Case further states that Ms. Columbus initially called asking about the County's flag policy – which Ms. Case considered a ruse - because Ms. Columbus pivoted to asking whether she would have an opportunity to speak with the investigator. Ms. Columbus advised Ms. Case that she had information to share with the investigator, but that she did not want anything to “come back on her.” Ms. Columbus' father is Michael J. Columbus, a Member of Council for Norfolk County. Ms. Case states that Ms. Columbus also said “I try to help her, but it falls on deaf ears.” Ms. Case believes that Mayor Bentley was the ‘her’ referred to in that statement.

Involvement of Mr. McKaig in the May 20, 2025 Meeting of Haldimand Council in Committee

[59] Mr. McKaig attended this meeting in his capacity as legal counsel to Haldimand County and provided an overview of the Report in open session. In preparation for the meeting, Mr. McKaig reviewed all of the documents depicted in the Post, which were appended to the unredacted version of the Report. In reviewing the correspondence depicted in the Post, Mr. McKaig determined that it was apparent from the contents of each of these documents that they contained confidential information and should not have been released to the public. Mr. McKaig advised Council of his opinion (i.e. that the content depicted in the Post was confidential) which he recalls was in response to a question in open session from Councillor Brad Adams regarding confidentiality at said meeting where Cllr. Adams questioned whether the information was actually confidential, particularly since none of the documents were stamped “Confidential.”

Interviews with Witnesses Who Did Not Participate in the Glacis Investigation

Mike Liscombe

[60] Mr. Liscombe was examined virtually under oath pursuant to a summons I issued and had him personally served with, in the presence of his lawyer, Douglas Burns. Prior to his examination, he produced what he stated were all text messages and emails between him and Rick Beaudet, the spouse of Mayor Shelly-Ann Bentley, and Mayor Bentley, which he was required to provide me pursuant to the summons I issued to him. He produced text messages exchanged with Rick Beaudet, the relevant ones being referenced and described in the text below. He claimed not to have any emails with Mr. Beaudet. He claimed not to have any text messages or emails directly

with Mayor Bentley. The following is a summary of the official court reporter's transcript of his examination.

Friendship with Rick Beaudet and Mayor Bentley

[61] Mr. Liscombe owns a car repair shop called Mi-Car Crafters Inc.¹¹ located in Haldimand County. He lives in Norfolk County. He has been friends with Rick Beaudet since 1980. Liscombe became acquainted with Mayor Bentley through his friendship with Rick.

[62] Liscombe and Rick discuss politics and political news, including news affecting Haldimand County. Liscombe has also had discussions regarding similar topics with Mayor Bentley, but characterized her as being more "tightlipped" regarding local political matters. Liscombe has known Mayor Bentley for 15 years. He has attended Haldimand County Council meetings at the invitation of Beaudet, who invited him to the May 5, 2025 meeting of Council at which Strong Mayor Powers were discussed.

Mayor Amy Martin

[63] Liscombe holds an unfavourable view of Mayor Martin, who he called a "liar and a cheat." Regarding a January 28, 2025 text to Rick Beaudet about "charges" against Mayor Martin for failing to step down as Norfolk County Mayor while she was running as a candidate in the provincial election, he said that he was simply asking questions.¹²

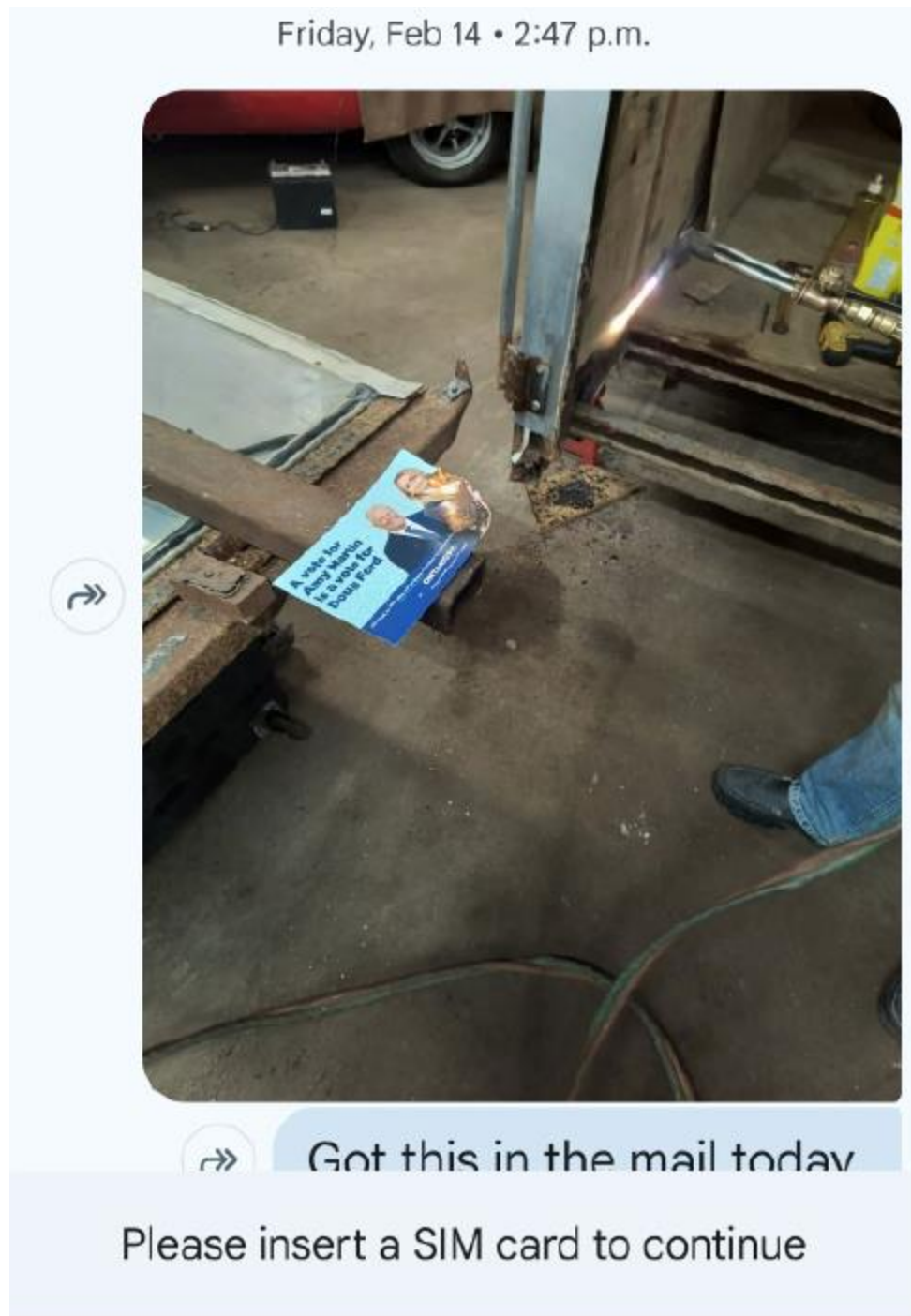
¹¹ Mr. Liscombe did not state the name of his business on his Examination. My office looked up the name following his Examination.

¹² Legally, there is no obligation for a sitting Member of Council to resign their position while running for federal or provincial office.



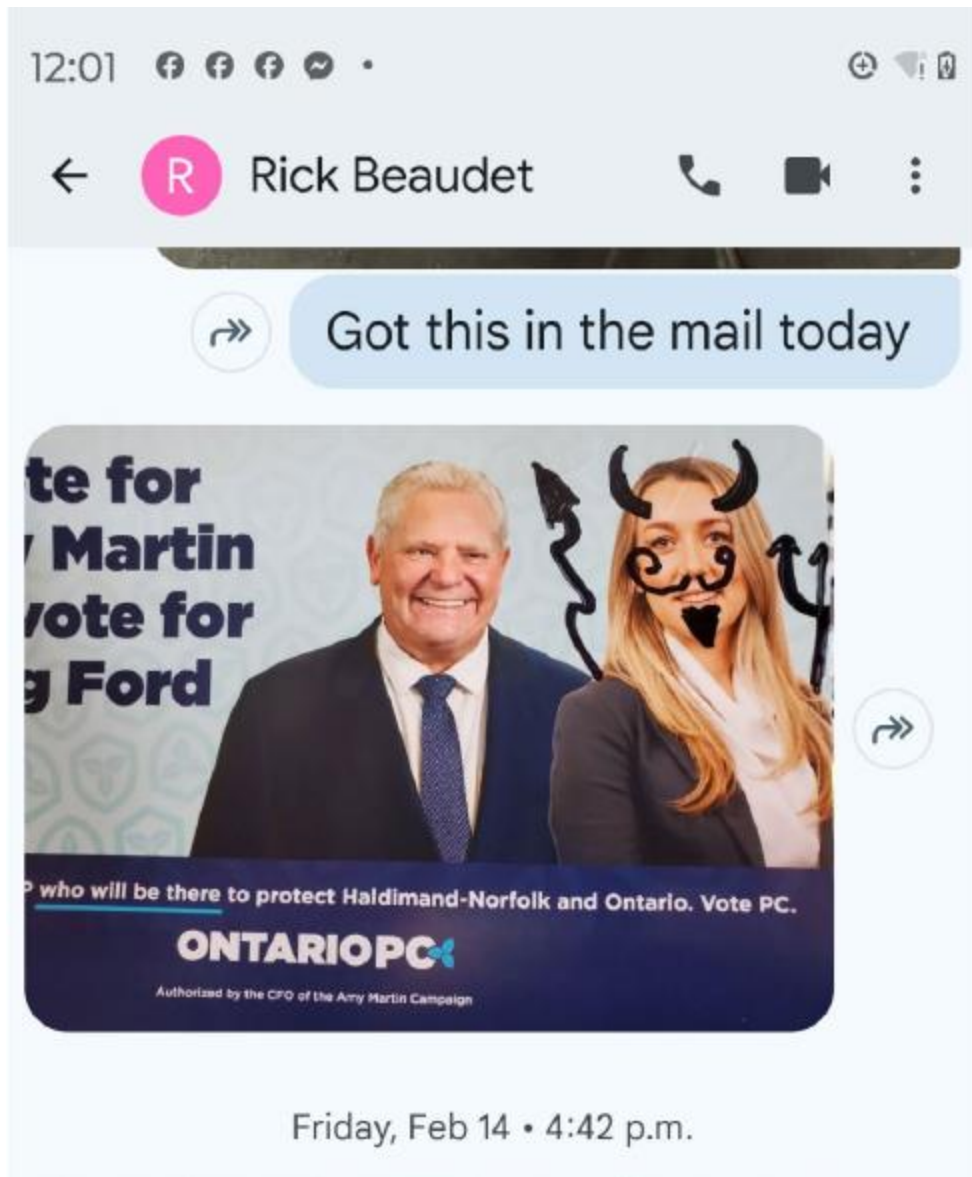
January 28, 2025 text from Liscombe to Beaudet re “charges”

[64] Regarding his February 14, 2025 text to Rick Beaudet – a picture of him burning a provincial election flyer for Mayor Martin - he confirmed that he sent the photo, but stated that he thought he only sent it to Beaudet.



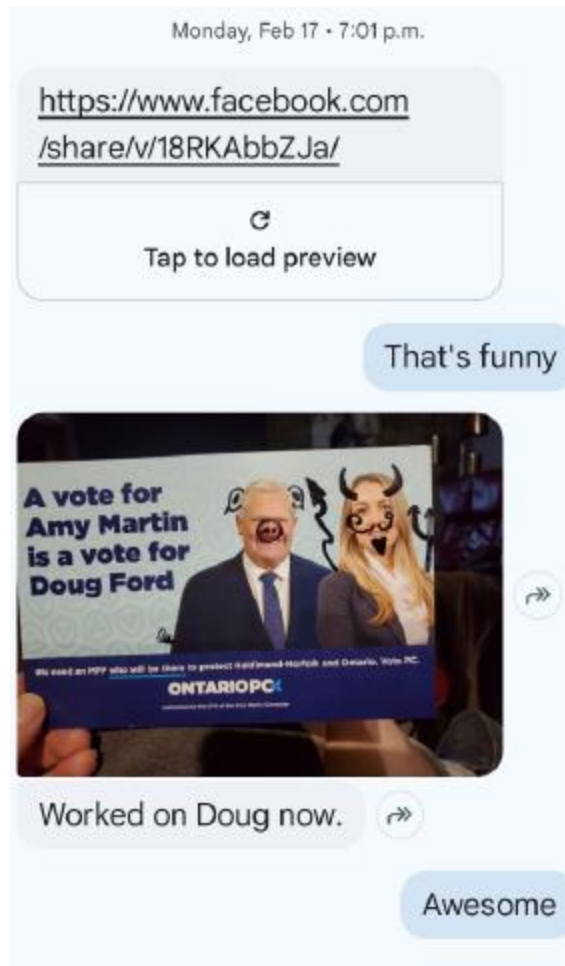
February 14, 2025 text from Liscombe to Beaudet

[65] Liscombe was initially hesitant to comment on Beaudet’s opinion regarding Mayor Martin, but subsequently revealed that he got the “vibe” that Rick strongly disliked Mayor Martin. He also confirmed that on February 14, 2025, Beaudet texted him a photo of a campaign flyer on which he had drawn “devil horns” on Amy Martin’s picture. Liscombe stated that the horns were “not far off” and that everyone he knows thinks that Mayor Martin is the devil.



February 14, 2025 text from Beaudet to Liscombe

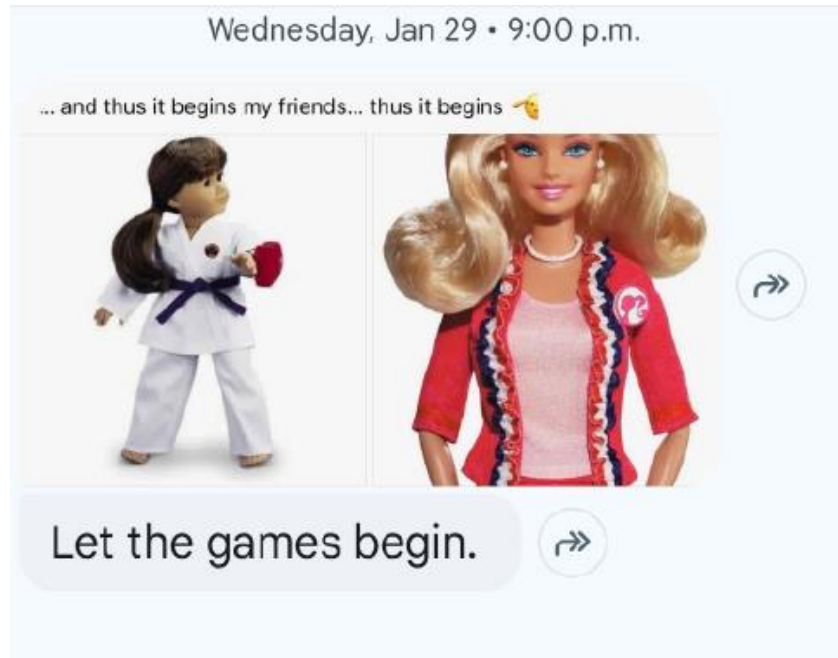
[66] Regarding the text that Beaudet sent on February 17, 2025 with a photo from an election flyer and the statement “Worked on Doug now”, Liscombe agreed that Beaudet was apparently attempting to depict Premier Ford as a pig.



February 17, 2025 text from Beaudet to Liscombe

[67] Liscombe stated that he could not pinpoint any discussions that he had with Beaudet during which Beaudet had disclosed that he disliked Mayor Martin. Liscombe then improperly and abruptly muted his microphone and proceeded to have an extended off-the-record discussion with his legal counsel. When he reactivated his mike, I advised not to do that again (he did not).

[68] Regarding a text that Beaudet sent on January 29, 2025 with photos of a brown-haired doll and a blonde Barbie with the comment “Let the games begin”, Liscombe initially stated that he did not understand what Beaudet meant and had never put any thought into it. When it was put to him, he agreed that Bobbi-Ann Brady was being depicted by the brown-haired doll and Mayor Martin by the Barbie and that it could have been a reference to the 2025 Ontario Provincial election.



January 29, 2025 text from Beaudet to Liscombe

The Post

[69] He admitted that he made the Post and submitted the request to make same anonymously to the Facebook Group “Dunnville Talks.” Regarding how he obtained the documents, Liscombe claimed that they were dropped off at the front desk of his place of business (Mi-Car Crafters Inc.) at 12 John St, Hagersville by a “mystery woman,” who, when leaving them with him, said “you might be interested in these”. He described the person who left the documents as a female, but claimed he did not recognize her and was unable to provide any further description. He referenced being unable to do so in much the same way that he would be unable to describe the process server who effected service of the Summons to Witness on him for the within examination.

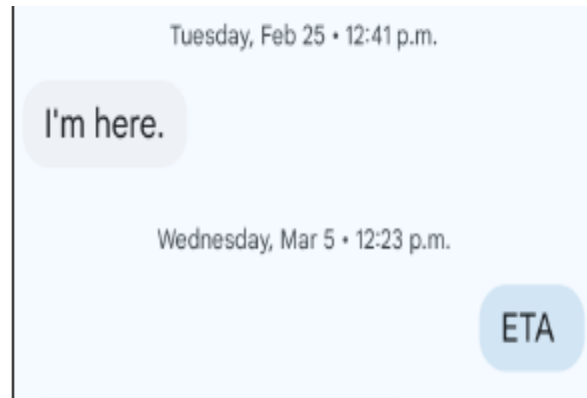
[70] Liscombe claimed that he did not review the documents until the day after receiving them and could not recall which day they were provided to him, but he thought that he made the Post on “Sunday”.¹³ After some initial hesitation, Liscombe confirmed that it was his clipboard seen in some of the photos comprising the Post. He could not recall where he photographed the documents.

[71] Liscombe had no knowledge to confirm or deny that the documents came from Haldimand County. He speculated that they were printed from the Norfolk County side of the correspondence because he is under the impression that Norfolk County staff dislike Amy Martin. When pressed, Liscombe advised that he could not say why he wrote that the documents came from a “Norfolk

¹³ Liscombe was candid and said that he did not remember when he made the Post and made it clear that “Sunday” was a guess. The time frame for making the post suggests that it was submitted for approval on either a Wednesday or Thursday as Liscombe joined Dunnville talks on February 26, 2025 – a Wednesday. The post was approved on February 28, 2025 - a Friday.

county staffer” and admitted that he was just speculating that it was a Norfolk County staffer who provided the documents.

[72] Regarding a cryptic text from Beaudet on February 25, 2025 stating only “I’m here”, Liscombe could not recall where “here” was or why he and Beaudet were apparently coordinating a meeting.¹⁴ He denied that Beaudet was attending a specific place to provide him with the documents that formed the Post. Rather, Liscombe thought that the text was in relation to plans for the two of them to have lunch. He adamantly denied that Beaudet was texting in relation to any plan to drop of the documents that later comprised the Post.



February 25, 2025 text from Beaudet to Liscombe

[73] When asked why he had lied to David Judd, the reporter with the [Port Dover Maple Leaf](#), about initially seeing the documents on a social media site then screenshotting them and then posting them on the Dunnville Talks site when he was now saying they were delivered to him by an unknown mystery woman at his place of business, Liscombe stated that the press has a “callous disregard for everyone” and “if they don’t print the truth, if they don’t fact check, they make it up.” He was operating under the assumption that Judd was going to print what he described as a “convoluted tale” and that it seemed like a good idea to lie regarding how he acquired the documents. He maintained that the documents were delivered by this mystery woman in my examination of him under oath.

[74] Mr. Liscombe then proceeded to provide his opinion on the confidentiality of the documents themselves. He advised that he did not consider the body of the documents depicted in the Post to be confidential. He further opined that it was not the role of a municipal Chief Administrative Officer to request that documents be removed from social media. From his perspective, commencing an investigation into the Post was “ludicrous.” His purported reason for making the Post was that the people of Haldimand County should know how Amy Martin feels about them.

[75] When asked why he made the Post anonymously despite not considering the documents to be confidential, Liscombe advised that he did so to avoid “heat.” He was concerned that many people may dislike the Post, despite what he considered to be a “great many people” who dislike

¹⁴ The preceding exchange between the two of them was on February 17, 2025 and the most recent subsequent messages were exchanged on March 5, 2025.

Amy Martin. Liscombe added that Mayor Martin's effort to "exclude" Haldimand County from the Board of Health merger discussions was wrong and that she should be censured for that effort.

[76] When asked why the Post was only made to Dunnville Talks, Liscombe advised that he would have posted the documents to more sites, but that he submitted the request for the Post in the morning and became busy later in the day, implying that he forgot about it. He did not provide a specific reason as to why the Post was only made to Dunnville Talks or why he joined that specific group.

Glacis Report

[77] Liscombe disagreed with the statement that he had declined to speak with Glacis and characterized his position as being that he had only declined to speak with Glacis on questions that were "offside".

[78] Liscombe agreed that he was depicted in the below photo from Toby Barrett's Facebook page included at page 14 of the Glacis Report. He also identified Mayor Bentley, Rick Beaudet, MPP Brady and Cllr. Brad Adams as also being depicted by the photo. He thought that the other people in the photo were supporters of Cllr. Adams.



Photo from Toby Barrett's Facebook page included at pg. 14 of the Glacis Report

Motive for the Post

[79] Liscombe disagreed that the purpose of the Post was to harm Amy Martin politically. He said that reading the documents reminded him of the past 30 years during which Haldimand has

been excluded from the Health Unit despite having two hospitals. He said that Amy Martin did not stand a chance in the election and that the Post was not required to ruin her chances. In response to a question regarding the proximity between his attempt to post the Post and the election, he cryptically said that “there are no coincidences”, then stated that the Post had nothing to do with the election.

Richard Joseph Beaudet

[80] Mr. Beaudet was examined virtually under oath pursuant to a summons I issued and had him personally served with, in the presence of his lawyer, David Marshall. Mr. Beaudet did not produce texts and emails between him and Mr. Liscombe prior to his Examination but did afterward. They were the same as those produced by Mr. Liscombe. The following is a summary of the official court reporter’s transcript of his examination.

Personal Background

[81] Mr. Beaudet is retired. His spouse is Mayor Shelley Ann Bentley. They have been a couple for 18 years.

Friendship with Mike Liscombe

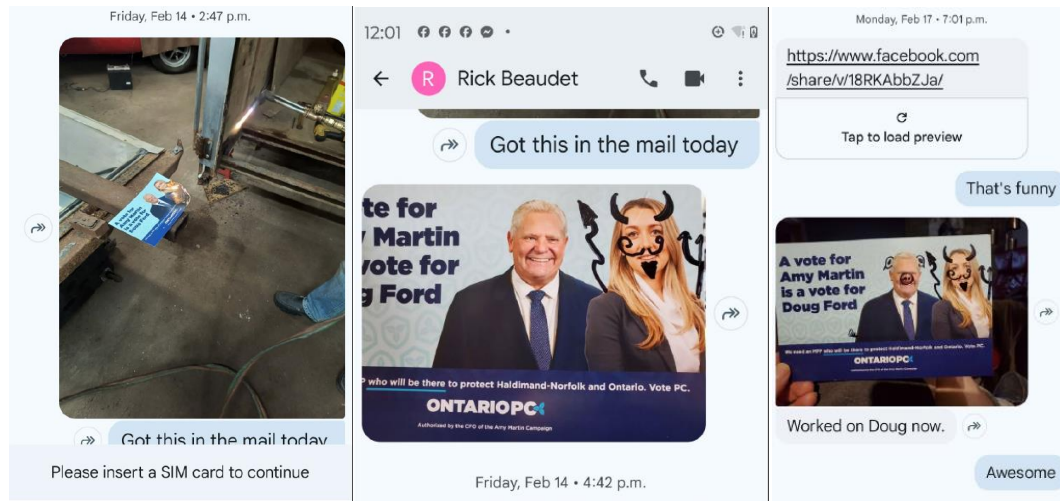
[82] He has been friends with Mike Liscombe for the past 45 years.

[83] Beaudet advised that he and Liscombe discuss Haldimand County politics and agreed that he had invited Liscombe to the May 5th, 2025 Haldimand County Council Meeting at which Strong Mayor Powers were discussed. Beaudet advised that he attends approximately 95% of Haldimand Council meetings. He and Mayor Bentley discuss County politics “to a point.” Beaudet stated that he is a friend of MPP Bobbi Ann Brady and so is Mayor Bentley.

Mayor Amy Martin

[84] Beaudet advised that he does not hold Amy Martin in high regard and that he thought she was a “nasty thing.” Beaudet said that he was opposed to Mayor Martin running in the 2025 Ontario Provincial election because of her duties acting as Mayor of Norfolk County and that she only took time off from such duties because she was forced to.

[85] Regarding the February 14, 2025 text from Liscombe to Beaudet depicting Liscombe burning an Amy Martin election flyer, Beaudet initially advised that this was a “trend” on social media, but disclosed that he was not, in fact, an active user of social media. Beaudet stated that he thought Liscombe had sent him this image because they were both like minded, but Beaudet confided that he did “see the humour in it”.



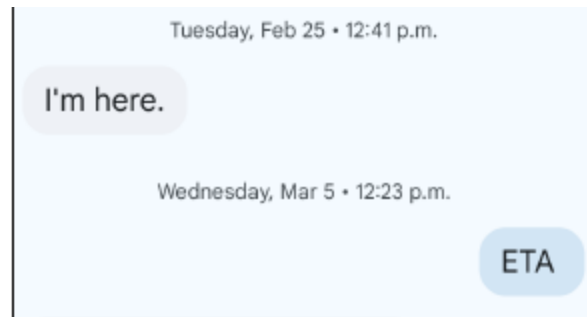
[86] Beaudet admitted that he did reply to Liscombe that same day with a text of a picture depicting “devil horns” drawn on Mayor Martin. However, Beaudet stated that he thought a different person drew pig features on Doug Ford and that he only sent it to Liscombe. Beaudet then represented that these images were just a form of “humour”, not animosity. Beaudet admitted that he did not have any humorous photos of MPP Bobbi Ann Brady that he had annotated.

The Post

[87] Beaudet advised that he is not a member of any groups on Facebook, including Dunnville Talks and that he is not familiar with that group. He confirmed that he does have a Facebook account, but has not used it in fifteen years.

[88] Beaudet initially stated that he had no knowledge of who made the Post, but later recanted slightly to say that he had no knowledge at the time the Post was made, but after the Glacis Report, he was able to “infer” that Liscombe made the Post. He said that he did not know how Liscombe got the documents.

[89] When confronted with the isolated text he sent to Liscombe on February 25, 2025 stating “I’m here”, Beaudet initially thought that was in reference to the two of them meeting for lunch. He mistook the next text in the chain between he and Liscombe that he sent on March 5, 2025 stating “Half an hour, already ate.” as being part of the same conversation as the “I’m here” text. He disagreed that the “I’m here” text was in relation to a meeting with Liscombe to provide him with copies of the documents that later formed the Post, which Liscombe had applied to post anonymously either that same day or the following day. Instead, he still thought it was to coordinate meeting him for lunch. Beaudet stated that he has never had the documents comprising the Post and that he never provided them to anyone.



[90] Beaudet advised that when he learned that Mike had posted the documents,¹⁵ he was in disbelief and asked Mike why he would do such a thing. Beaudet said that his initial reaction was that he was worried for his wife because “everyone wants her out of that job.”

Glacis Report

[91] Beaudet advised that he was never contacted by Glacis.

Motive for the Post

[92] When put to him that the Post seemed to be made to influence the 2025 Provincial Election, Beaudet thought that everyone would have voted by the eve of the election. He was never privy to discussions about posting right on the eve of the election.

Mayor Shelley Ann Bentley

[93] Mayor Bentley was examined virtually under oath pursuant to a summons I issued and had her personally served with, in the presence of her lawyer, David Marshall. The following is a summary of the official court reporter’s transcript of her examination.

Personal Background

[94] Shelley Ann Bentley has been the Mayor of Haldimand County since November 2022. Her husband is Rick Beaudet. They have been together for 18 years.

Friendship with Liscombe

[95] Mayor Bentley described Mike Liscombe as her friend. She confirmed that he attends Council meetings from time to time. Mike Liscombe resides in Norfolk County but has a business in Haldimand County.

Relationship with MPP Brady

[96] Mayor Bentley confirmed that she is friends with MPP Bobbi Ann Brady. Mayor Bentley met the MPP in 2022. They both ran for office that year. She defined the scope of their friendship as akin to a political relationship, in that they have a “little” bit of a friendship but do not know each other’s children nor do they meet socially, such as to have coffee or meals together. They

¹⁵ He claimed at this point in his Examination that someone told him that Liscombe had made the Post.

will attend gatherings or functions together with others, like going out after a debate. The Mayor recounted attending a pub after the Ward 4 by-election debate in Haldimand County. She attended with Liscombe, MPP Brady, Cllr. Adams, and Beaudet, among others. Mayor Bentley attended the MPP's New Years Levee event on New Year's Eve 2024 and MPP Brady's 2025 swearing-in ceremony and subsequent lunch. She described it as a smallish gathering held at the restaurant in the legislature building at Queen's Park. A photo of the gathering of those in attendance provided to us showed 12 people present. Her husband (Mr. Beaudet) was not in attendance at this event.

The Merger

[97] Mayor Bentley stated her understanding that the merger between the Brant County-Brantford and Haldimand-Norfolk Boards of Health took effect on January 1, 2025.¹⁶ During the Merger process, the Mayor sat on the Board of Health and Social Services, a Haldimand County specific-board, as well as the Board of Health Merger Committee. The Mayor advised that she was temporarily removed from the Merger Committee in response to a letter from Woody McKaig dated November 5, 2024. The letter dated November 6th from Mayor Martin said she would remove Mayor Bentley from the Board if no response was provided.

[98] The Mayor referred to an email from Cathy Case to Council for Haldimand County dated November 13, 2024 regarding the status of correspondence exchanged between it and Norfolk County in early November 2024. Said email confirmed that Mayor Bentley and Cathy Case met with Norfolk to discuss the issues raised in these documents on November 8th, 2024.

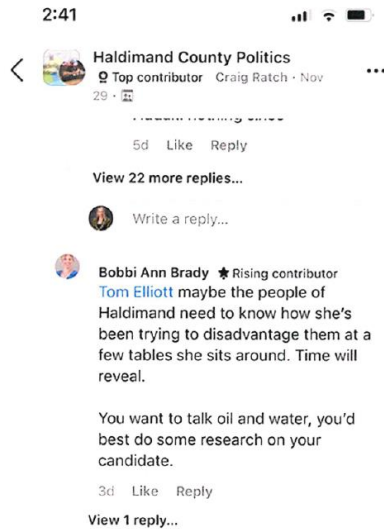
[99] The Mayor advised that although she was temporarily removed from the Merger Committee, she was re-appointed to the Merger Committee in December 2024.¹⁷

MPP Brady Facebook Posts

[100] Facebook comments made by MPP Brady concerning Mayor Martin disadvantaging Haldimand County posted in November 2024 – at the very time that the controversy regarding Mayor Bentley's place on the Merger Committee was taking place - set out below were put to the Mayor:

¹⁶ It in fact took effect on December 2, 2024.

¹⁷ We have reviewed an email dated November 20, 2024 from Mayor Martin to Mayor Bentley wherein the latter was removed from the Merger Committee. As noted at footnote 10, Mayor Bentley was reinstated to the Merger Committee before the merger given that the merger was finalized on December 2, 2024, 12 days after Mayor Bentley was removed from the Merger Committee.



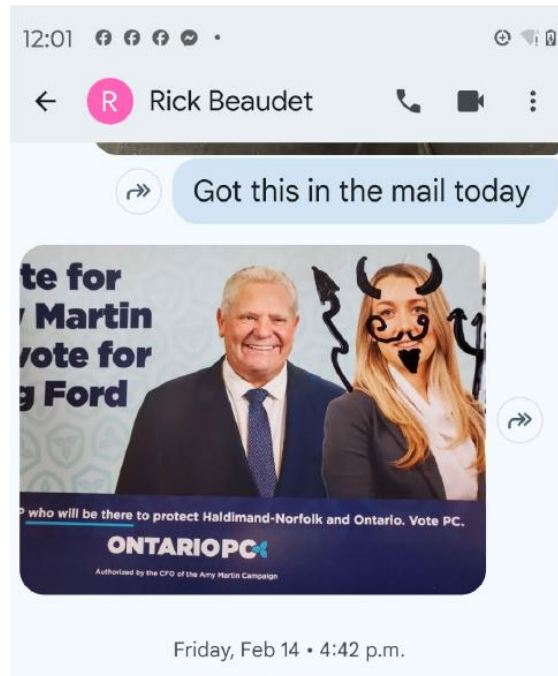
[101] When we suggested they referred to Mayor Martin's role on the Merger Committee and suggested MPP Brady was aware of the inner workings of that Committee as of November 2024 (despite her having nothing to do with the Merger), she noted that her interpretation of these comments was that they did not refer to the Merger Committee. Mayor Bentley initially stated that Mayor Martin sat on many boards at that time. When asked what boards she sat on that would have affected Haldimand County, Mayor Bentley then pivoted and said that she was not sure what MPP Brady was referring to. Ultimately, she was not certain whether the comment referred to the Merger Committee. Mayor Bentley advised that she never shared or discussed the documents depicted in the Post with MPP Brady.

Confidentiality of the Documents

[102] Mayor Bentley advised that she did not think that the documents depicted in the Post were confidential based on the representations in the letter from Cathy Case dated November 13, 2025. This letter was sent after the meeting as between the Mayor, Case, Mayor Martin and the Norfolk County CAO on November 8, 2024, at which Norfolk County took the position that the documents were confidential.

Mayor Martin

[103] The photo sent by Beaudet of devil horns drawing on the Amy Martin election brochure was put to the Mayor. In response, she agreed that Beaudet did not like Mayor Martin. However, she opined that Mayor Martin did a fine job as mayor of her municipality, despite saying that she supported MPP Brady in the 2025 Provincial Election. The Mayor advised that she thought MPP Brady and Mayor Martin were suited to their respective positions and stated that her support of MPP Brady did not reflect any animosity towards Mayor Martin.



The Documents

[104] When asked why she printed documents that ultimately formed the content of the Post in mid-February 2025 for a Merger that had been finalized and completed in December of the previous year, the Mayor advised that she had asked her assistant, Kendle Columbus, to print off several “important” documents. The Mayor stated that this was because she had lost several key documents as a result of and during the County’s transition to the Microsoft Office 365 program suite during the Christmas holidays 2024. Specifically, she said that she was reading emails over the Christmas holidays and that they would “just disappear.” She advised that she had contacted IT regarding this issue in January [2025] and that they had fixed the issue. Out of fear that these documents and emails would be lost, the Mayor asked Kendle to print hard copies for safekeeping. When asked what other important documents she printed out, the only others she could recall related to an MZO process (which was still ongoing) as well as some documents about her “former clients” (we did not understand what this reference was to but as it seemed irrelevant, we did not pursue this line of questioning). When we asked her why she considered the documents that later formed the Post she printed out to be important to preserve given that they only related to process as opposed to substance and that process had culminated with the Merger months earlier, she had no real response beyond that she thought that the documents were important and did not want them to go missing. Her Worship added that she needed them for the purposes of her examination by me and had they “disappeared”, she would not have had them for same.¹⁸

[105] The Mayor advised that from the time she printed them out until the date of her examination, she stored the documents forming the Post in a large wheely-cart with an extendable handle, and that she carried them around with her from her home to the office and back in this

¹⁸ She, of course, could not possibly have anticipated, in mid-February 2025 when the documents were printed out, being examined by me about the Post which was made at the end of February 2025 and concern about her alleged involvement in that Post which did not arise until May 2025.

wheely-cart on a daily basis. It is not locked. While it is at home, the wheely-cart was kept in a closet or cabinet in her home-office.

[106] The Mayor did not bring the wheely-cart to the examination, but brought the documents with her in a leather brief. The Mayor maintained that the documents depicted in the Post, to the best of her knowledge, had stayed in the wheely-cart since they were printed by Kendle. The wheel-cart is a foot and a half wide by a foot and a half tall.

[107] While it is being stored in their home, her spouse, Mr. Beaudet would have access to the wheely-cart. To the best of her knowledge, he had never accessed it. As far as she is aware, Liscombe has never accessed her home office. Aside from the documents, Mayor Bentley said that she would use the wheely-cart to transport other items, like Council meeting agendas and related documents.

The Post

[108] Mayor Bentley stated that she has no idea how Liscombe obtained the documents that formed the Post. She added that Cathy Case took it upon herself to hire Glacis to investigate the Post. Ms. Case did not discuss going to Norfolk County to jointly hire a private investigator with her prior to doing so.¹⁹ Mayor Bentley advised that, prior to the release of the Glacis report, she promoted the idea of using the Integrity Commissioner to investigate the Post. When we pointed out that as Integrity Commissioner, I only have jurisdiction to investigate Members of Council and Local Boards, not County staff, such that if a staffer leaked the documents, I would have no jurisdiction, she agreed that this was the case. After the Glacis Report was tabled, Mayor Bentley never considered proposing an investigation by the IC into who made the Post.

[109] The Mayor declined to comment on the potential motive of Liscombe in making the Post. In or around February 27 and 28 in February, Mayor Bentley said she was sick with the flu. Because of this, she states that she was not aware of the circumstances regarding the Post. She does not know if Beaudet provided the documents to Liscombe.

The Investigation

[110] Mayor Bentley did not participate in the investigation by Glacis because, according to her, there has been a private investigator following her since she was elected in 2022 in relation to the Empire Communities MZO. She stated that she felt offended by the request to be interviewed by a private investigator. Purportedly, there is a lot of money (i.e. Empire Communities Inc.) trying to undermine her due to her opposition to the MZO. She said she has a police statement confirming that a private investigator has been following her.

¹⁹ Mayor Bentley unilaterally terminated Ms. Case as CAO without public explanation on June 27, 2025: Nick Fearn, "Mayor Bentley fires Haldimand CAO Cathy Case" *The Haldimand Press* (July 3, 2025), online: <https://haldimandpress.com/bentley-fires-cao-cathy-case/>.

Subsequent Disclosure

[111] The May 20, 2025 Meeting of Council at which the Glacis Report was considered was put to the Mayor. She confirmed that she acted as Chair of the meeting. She confirmed that she heard Mr. Woody McKaig share his opinion that – based on the content of the documents – he considered the documents depicted in the Post to be confidential. She added that she is not sure why Mr. McKaig changed his opinion regarding the confidentiality of the documents between November 2024 and the May 2025 meeting. Mayor Bentley then referred to Cathy Case’s November 13, 2024 email and said that Mr. McKaig told her during a Zoom call in November 2024 that he did not think that the documents were confidential.²⁰ The Mayor freely admitted that she posted the documents that formed the Post to her Mayoral Facebook page as well as provided them to the Hamilton Spectator, despite the fact that this was after hearing Mr. McKaig’s opinion regarding confidentiality of those documents at the May 20, 2025 Council meeting. She maintained, notwithstanding his opinion, that she did not believe the documents to be confidential.

Unsuccessful Attempts to Obtain Evidence From MPP Bobbi Ann Brady

[112] Our office requested of MPP Bobbi-Ann Brady that she voluntarily submit to being interviewed by the Integrity Commissioner in relation to this investigation. She declined to voluntarily participate on the basis that she “had no involvement in the matter.” We then prepared a summons pursuant to the Integrity Commissioner’s powers under the *Public Inquiries Act, 2009*. MPP Brady was initially uncooperative in arranging to be served with the Summons. After I pointed out that not cooperating in being served would not reflect well on her in my Report, she made arrangements to be served with the Summons, which occurred on Tuesday, September 2, 2025. The Summons was initially returnable in the afternoon of Thursday, September 4th, however, after MPP Brady’s office advised that this time was not convenient to her, the Examination was re-arranged for the morning of Friday, September 5th at her request and she confirmed she would attend at that time. In addition to requiring her to attend virtually to be examined through a court reporter’s office in Hamilton, she was directed to produce all emails and texts between her and Mayor Bentley covering a stipulated time frame prior to her scheduled Examination.

[113] In the mid-afternoon of Thursday, September 4th, when her Examination was originally scheduled to be in progress, I received a letter from an Ottawa law firm retained by MPP Brady. The gist of the letter was that pursuant to “Parliamentary Privilege,” MPP Brady did not have to attend to be examined pursuant to the Summons I had issued and had served upon her. It did not explicitly state that MPP Brady would not consent to be examined by me, whether under oath or not, or that she would not produce the emails and texts between her and Mayor Bentley I had required her to produce. In two successive emails later on September 4th, I asked her counsel to clarify these issues. In response, by email dated September 5th, MPP Brady’s Ottawa lawyer confirmed that MPP Brady would not submit to any form of questioning by me and would not be

²⁰ When asked about this alleged November 2024 Zoom Call following Mayor Bentley’s Examination, Mr. McKaig stated: “I do not recall any discussion at any time with the Mayor regarding whether or not the letters were confidential vis a vis the public, nor do I recall it ever being an issue that I considered at that time [November 2024].” He maintained that he always believed that the documents related to the Merger and Haldimand County’s participation in the Merger discussions to be confidential.

producing the documents I had summonsed her to produce, claiming the latter was also covered by Parliamentary Privilege.

[114] It is not at all clear to me that MPP Brady had “no involvement in the matter” given, among other reasons, 1) her relationship with Mayor Bentley and her husband, Mr. Beaudet; 2) her November 2024 emails alluding to a “few tables” Mayor Martin sat around where she was disadvantaging the people of Haldimand County, which sounds like a reference to Mayor Martin’s role as Chair of the Haldimand-Norfolk Board of Health and Chair of the Merger Committee of that Board in relation to Boards of Health Merger with the Brantford-Brant County Board of Health; and, 3) the obvious temporal connection between the Provincial election and the publication of the Post which clearly appeared to be an effort to influence the vote in that election against Mayor Martin and in favour of MPP Brady.

[115] Unfortunately in terms of the pursuit of the truth for the people of Haldimand-Norfolk, MPP Brady is entitled to avoid being examined by me in relation to this matter by relying on Parliamentary Privilege.²¹ Although all of the cases we have found dealing with Parliamentary Privilege dealt with Prime Ministers, Premiers and Members of Federal or Provincial Cabinet, it appears that the doctrine extends to all parliamentary representatives regardless of their stature, including MPP Brady. Furthermore, the Privilege is at the particular Member’s discretion. In other words, the Privilege does not bar the Member from being examined pursuant to a Summons and does not render the Summons a nullity but rather is something the Member can raise to avoid being examined at their discretion.²²

²¹ See, for example:

- *Ontario (Premier) v. Canada (Commissioner of the Public Order Emergency Commission)*, [2022 FC 1513](#) (CanLII) (The Public Order Emergency Commission sought to compel Premier Ford and one of his Ministers to testify by way of summons. The Premier and Minister brought a motion to stay the summons, which was granted in part. The court found that the summons were valid but that so long as the Ontario legislature was in session, the members could assert the parliamentary privilege of testimonial immunity to resist the summons);
- *Dunphy v. Peel Housing Corporation*, [2009 CanLII 21760](#) (ON SC) (The provincial Environment Minister quashed a summons calling on him to testify in a civil proceeding. It was primarily quashed because he did not have any relevant evidence, but testimonial immunity was referred to in *obiter*);
- *Telezone Inc. v. Canada (Attorney General)*, [2004 CanLII 36102](#) (ON CA) (The Ontario Court of Appeal allowed an appeal setting aside an Order requiring the Federal Minister of Industry to attend an examination for discovery. This case stands for the proposition that the parliamentary privilege extends for 40 days after the prorogation or dissolution of a session of parliament and 40 days before the commenced of a new session. In other words, even if the Legislature is not actively sitting, a Member can still invoke the Privilege despite the fact it would not cause them to miss any time from fulfilling their duties in the Legislature);
- *Trudeau v. His Majesty the King*, [2023 ONSC 1598](#) (CanLII) (The Court quashed a subpoena served the PM Trudeau in a criminal proceeding).

²² See, for example, *Ontario (Premier) v. Canada (Commissioner of the Public Order Emergency Commission)*, 2022 FC 1513 (CanLII) at paras. 58-60.

[116] I find it frustrating and disappointing that MPP Brady would elect to invoke a discretionary privilege to avoid having to tell the residents of her Haldimand-Norfolk riding what she knows about the leak of the documents that formed the Post. This has been a well publicized issue that is no doubt important to many residents of her riding. The Councils of the two municipalities that make up her Provincial riding have both called for an investigation to clear the air on the leaked documents. I certainly think in light of this that she owed the residents of Haldimand-Norfolk an explanation of her Facebook post in November 2024 made on the heels of the exchange of emails that formed the Post where she wrote “maybe the people of Haldimand need to know how [Mayor Martin] has been disadvantaging them at a few tables she sits around. *Time will reveal*” [emphasis added] and whether this was a reference to the matters dealt with in the leaked documents, and that they would eventually be made public.

[117] I considered bringing a Court Application to compel MPP Brady to be examined notwithstanding the Privilege in light of her arguable waiver of that Privilege in agreeing to be examined under oath and not raising the Privilege initially then resiling from that,²³ and the uncertainty of whether my request for documents pursuant to the Summons was covered by the Privilege (I do not believe it is); however, in light of the cost and delay such a proceeding would cause, and the apparent determination of MPP Brady not to divulge to her constituents what she knows, if anything, about the matter, I elected not to pursue such proceedings.

Email Exchanges with Mike Brousseau, July 23 to August 11, 2025

[118] Mike Brousseau, the Chief Information Officer (“CIO”) with the Corporation of Haldimand County, advised us that neither Mayor Bentley nor any staff on her behalf contacted the County’s IT department in or around December 2024 or January 2025 regarding deleted emails. He added that, based on discussions with his team, he has no reason to believe that any of the Mayor’s emails were randomly deleted as part of a technical transition.

[119] Mr. Brousseau added that Mayor Bentley had some technical issues receiving emails to one of her two County email accounts, which had been reported to IT by Ms. Colombus near the end of November 2024. There were two instances in April and June 2025 during which emails sent to all County staff were delayed.

Response of Mayor Bentley to Mr. Brousseau’s Email

[120] My office received a forward of an email from Mayor Bentley to Ms. Case on March 6, 2025 reporting that the former had been having issues with her computer since Christmas, including the “loss of emails over the Christmas holidays.”

Further Reply from Mike Brousseau

[121] In response to the foregoing email, Mr. Brousseau advised that the Mayor had previously experienced technical issues accessing County systems relating to Microsoft Outlook and her VPN connection. He was of the opinion that these issues did not result in the deletion or “loss” of any

²³ Had she invoked the Privilege prior to our service of the Summons on her, the cost to the residents of Haldimand County of the process server for serving MPP Brady could have been avoided.

emails – some emails may have merely been delayed in their delivery and/or quarantined after being sent. He noted that the Mayor receives a significant amount of emails which are flagged as spam by County security systems. A list of spam messages sent to Mayor Bentley are regularly sent to Ms. Columbus, who reviews them for legitimacy.

[122] As part of the documents received by my office, the Mayor included an email chain dated December 20 to February 26, 2025 which purports to show that an email sent to one of her two County emails was either not delivered or delayed in delivery, as the chain is forwarded to the Mayor's other County email account by the original sender. After being forwarded the chain, the Mayor acknowledges receipt and notes that she did not receive the originating message.

[123] Mr. Brousseau noted that the County's system only permits users to review the past 90 days of emails flagged as spam. The sender referenced in the paragraph above had sent three emails to Mayor Bentley over the previous 90 days, none of which were flagged as spam.

Email Exchange with Chad Curtis

[124] On June 2, 2025, I asked Chad Curtis, the Clerk of Haldimand County, whether all Council considerations of matters related to the Merger were held in camera and whether any documents associated with Merger agenda items were contained in the confidential in camera package, rather than the public agenda package. He responded that all discussions of Merger-related matters at Council meetings occurred in camera and all documents associated with such discussions, which he confirmed there were, were contained in the confidential information package for councillors only and were not made available to the public.

Email Exchanges with William Tigert and Sarah Page

[125] Both William Tigert, Norfolk County Clerk, and Sarah Page, Norfolk County's General Manager, Health and Social Services, confirmed that all considerations at Council meetings of matters related to the merger leading up to the merger on January 1, 2025 were held in camera and all documents associated with such discussions were contained in the confidential information package for councillors only and were not made available to the public. Ms. Page added that the documents were treated as confidential because they included reference to identifiable individuals, other municipalities in negotiations of a merger (there had been talk of three units then two units merging) and financial information about corporations/municipalities that were deemed confidential and not for release to the public.

Email from Brent Feeney, Director, Accountability and Liaison Branch, Office of Chief Medical Officer of Health, Public Health, Ministry of Health dated June 12, 2025

[126] Mr. Feeney was asked to outline the confidentiality expectations regarding the Boards of Health Merger negotiations. His email dated June 12, 2025 provided as follows:

In the summer of 2023, the Ministry of Health introduced a strategy to strengthen the public health system at the annual Association of Municipalities of Ontario (AMO) conference. One of the aspects of the strategy was voluntary mergers

between public health units. The Ministry of Health continues to support public health units throughout this process.

To undertake a merger, Boards of Health needed to consider the benefits and risks of this decision and undertake a detailed review of their own operations, liabilities, and structures. Boards of Health were asked to work together to develop detailed proposals to government outlining the benefits of a merger and a new organizational structure. These proposals were received by government and regulatory changes were required to formalize the introduction of the new organizations.

As such, Boards of Health would have had to consider and review information which is generally considered confidential/sensitive, such as information that could result in labour impacts, personal information related to senior managers, or liabilities of the organization. Boards of Health may also have had initial meetings with several different Boards of Health on potential mergers, that may have not materialized into a full proposal. Some of the meetings may have been undertaken confidentially to support an open and candid forum for discussion.

Given that Boards of Health are classified as local boards under the Municipal Act (2001), direction as to transparency and information sharing expectations may derive from this Act and/or specific by-laws developed by the Board of Health. Boards of Health may also seek individual legal or other expert advice when undertaking such decisions.

Analysis and Findings

Preliminary Issue #1: Were the Leaked Documents Confidential?

[127] “Confidential Information” is defined in the Haldimand County Council Code of Conduct as follows:

3.2 Confidential Information - Includes *but is not limited to* information in the possession of, or received in confidence by, Haldimand County that the municipality is either prohibited from disclosing, or is required to refuse to disclose, under the Municipal Freedom of Information and Protection of Privacy Act or any other legislation. [*emphasis added*]

[128] The common law test for a breach of confidence is threefold: (1) the information conveyed must be confidential, (2) it must have been communicated in confidence, and (3) it was misused by the party to whom it was communicated to the detriment of the confider.²⁴ As to the first stage of the test, something is considered confidential when it has the necessary quality of confidence

²⁴ *CTT Pharmaceutical Holdings, Inc. v. Rapid Dose Therapeutics Inc.*, 2019 ONCA 1018 at [para 31](#), citing *Lac Minerals Ltd. v. International Corona Resources Ltd.*, [1989 CanLII 34 \(SCC\)](#), [1989] 2 S.C.R. 574, at pp. 608, 635-36 and *Cadbury Schweppes Inc. v. FBI Foods Ltd.*, [1999 CanLII 705 \(SCC\)](#), [1999] 1 S.C.R. 142, at paras. [52-54](#).

about it: “it must not be something which is public property and public knowledge.”²⁵ Courts, albeit in the commercial context, have further considered the following factors to determine whether information has a “quality of confidence”:

- (a) The extent to which the information is known outside the business;
- (b) The extent to which it is known by employees and others involved in the business;
- (c) Measures taken to guard the secrecy of the information;
- (d) The value of the information to the holder of the secret and to its competitors,
- (e) The effort or money expended in developing the information;
- (f) The ease or difficulty with which the information can be properly acquired or duplicated by others; and
- (g) Whether the holder and taker of the secret treat the information as secret.²⁶

[129] In conjunction with the above factors, courts use the “reasonable person” test to determine whether information has the necessary quality of confidence. This requires asking whether a person, acting reasonably, should have expected the information to be confidential. If the person should have realized that the information was to be kept confidential, there is an implied obligation to maintain the information in confidence. This has been articulated as follows:

It seems to me that if the circumstances are such that any reasonable [person] standing in the shoes of the recipient of the information would have realised that upon reasonable grounds the information was being given to [them] in confidence, then this should suffice to impose upon [them] the equitable obligation of confidence. In particular, where information of commercial or industrial value is given on a business-like basis and with some avowed common object in mind, such as a **joint venture** ... I would regard the recipient as carrying a heavy burden if [they] seeks to repel a contention that [they were] bound by an obligation of confidence.²⁷ [emphasis added]

[130] Settlement privilege is established by demonstrating that: (1) a litigious dispute is in existence or within contemplation, (2) communication was made with the express or implied intention that it would not be disclosed to the court in the event that negotiations fail and (3) the

²⁵ *Lac Minerals Ltd. v. International Corona Resources Ltd.*, 1989 CanLII 34 (SCC), [1989] 2 S.C.R. 574, citing Lord Greene in *Saltman Engineering Co. v. Campbell Engineering Co.* (1948), 65 R.P.C. 203 (C.A.) (leave to appeal to House of Lords refused), at p. 215.

²⁶ *GasTOPS Ltd. v. Forsyth*, 2009 CanLII 66153 (ON SC) at [para 124](#), affirmed in 2011 ONCA [186](#) [“*GasTOPS*”].

²⁷ *GasTOPS* at [para 133](#), citing *Coco v. A.N. Clark (Engineers) Ltd.*, [1969] R.P.C. 41 at 48.

purpose of the communication must be to reach a settlement.²⁸ In the case of municipal corporations, privilege may only be waived by City Council and not by any one Member of Council.²⁹ Further, privilege is not lost if the content that is subject to privilege comes into the hands of third parties without privilege being waived by Council.³⁰

[131] Other Integrity Commissioners have held that if the municipality determines that information is to be kept confidential (as I find the Councils of both involved Counties did in considering merger-related correspondence only in closed sessions with the documents only forming part of the confidential information package distributed to Members), a Member of Council has no authority to question nor overrule that decision.³¹ Much like the waiver of privilege requiring Council's approval, individual Members are prohibited from unilaterally disclosing information that has been determined to be confidential by the municipality. These findings have been upheld on judicial review.³²

[132] I find that the subject documents were confidential within the meaning of s. 3.2 of the Haldimand Code of Conduct for the following reasons:

1. It is apparent from the nature and content of the leaked documents that the information contained therein was of a confidential nature and should not have been made public. In particular, the first letter in the Post from Mayor Martin dated November 6, 2024 is a response to a letter from Haldimand's external legal counsel, Mr. McKaig, to Mayor Martin dated November 5, 2024, in which the former concludes the letter by clearly implying that Haldimand may take legal action against Norfolk County and/or the Haldimand-Norfolk Board of Health unless certain demands made by Haldimand County are met. I find that the correspondence that followed – which was the content of the Post were letters exchanged in furtherance of resolving the dispute that had arisen - constituted “without prejudice” settlement discussions which were required to be kept confidential based on the principles of law set out in para. [130] above;
2. Haldimand's external legal counsel, Woody McKaig, came to the same conclusion in response to question from a Haldimand Councillor Rob Adams questioning whether the documents were in fact confidential when Mr. McKaig was taking Haldimand Council through the Glacis Report at its meeting on May 20, 2025. He specifically told Cllr. Adams that “it is apparent from the content of the letters that they were confidential.” Mayor Bentley was present at that meeting. He has further advised that he always believed the documents comprising the Post to be

²⁸ *Durham Regional Police v. Ontario Civilian Police*, 2024 ONSC 2214 at [para 25](#), citing *R v. Delchev*, [2014 ONCA 381](#) at para [24](#).

²⁹ *Elliott v. Toronto (City)*, 2001 CanLII 28070 (ON SC) at [para 9](#) [“*Elliott*”].

³⁰ *Elliott* at [para 11](#).

³¹ *Regional Municipality v Neal and Schummer*, 2021 ONMIC 15 at [para 99](#).

³² *Fallis v. City of Orillia*, 2022 ONSC 5737 at [paras 53 to 59](#).

confidential and did not tell Mayor Bentley otherwise at any time. In particular, Mr. McKaig advised us that at no time did he tell Mayor Bentley over a Zoom meeting or otherwise in November 2024 that the documents forming the Post were not confidential and he always believed and maintained that they were;

3. Mr. McKaig further referred to the content of the letters forming the Post as being “confidential material” in his March 7, 2025 email retaining Glacis;
4. Mayor Bentley claims that Mr. McKaig told her and Ms. Case in a Zoom meeting in early November 2024 that none of the information he discussed in his November 5, 2024 letter to Mayor Martin was confidential. She also cites an email from Cathy Chase dated November 13, 2024 where Ms. Case asserts that nothing in the November 5th letter from Mr. McKaig which was disseminated to third parties was confidential. Those assertions may have been true, but that is not the basis for why the subsequent correspondence following upon the November 5th correspondence was confidential. The confidentiality arose because the November 5th letter contained a clearly implied threat of litigation, thus rendering all subsequent responses and negotiations confidential on the basis of “settlement privilege”;
5. Discussions of the Board of Health merger, including matters referenced in the leaked documents, were always considered in closed session by both Haldimand Council and Norfolk Council, without any objection from any Member on either Council at the times they were considered;
6. It is trite law that otherwise confidential documents do not lose their status of confidential simply because they are not expressly marked “Confidential.”³³ The fact that none of the documents forming the post were so marked does not detract from the fact that they were clearly confidential based on their content.

Preliminary Issue #2: The Standard of Proof for Findings of an Integrity Commissioner

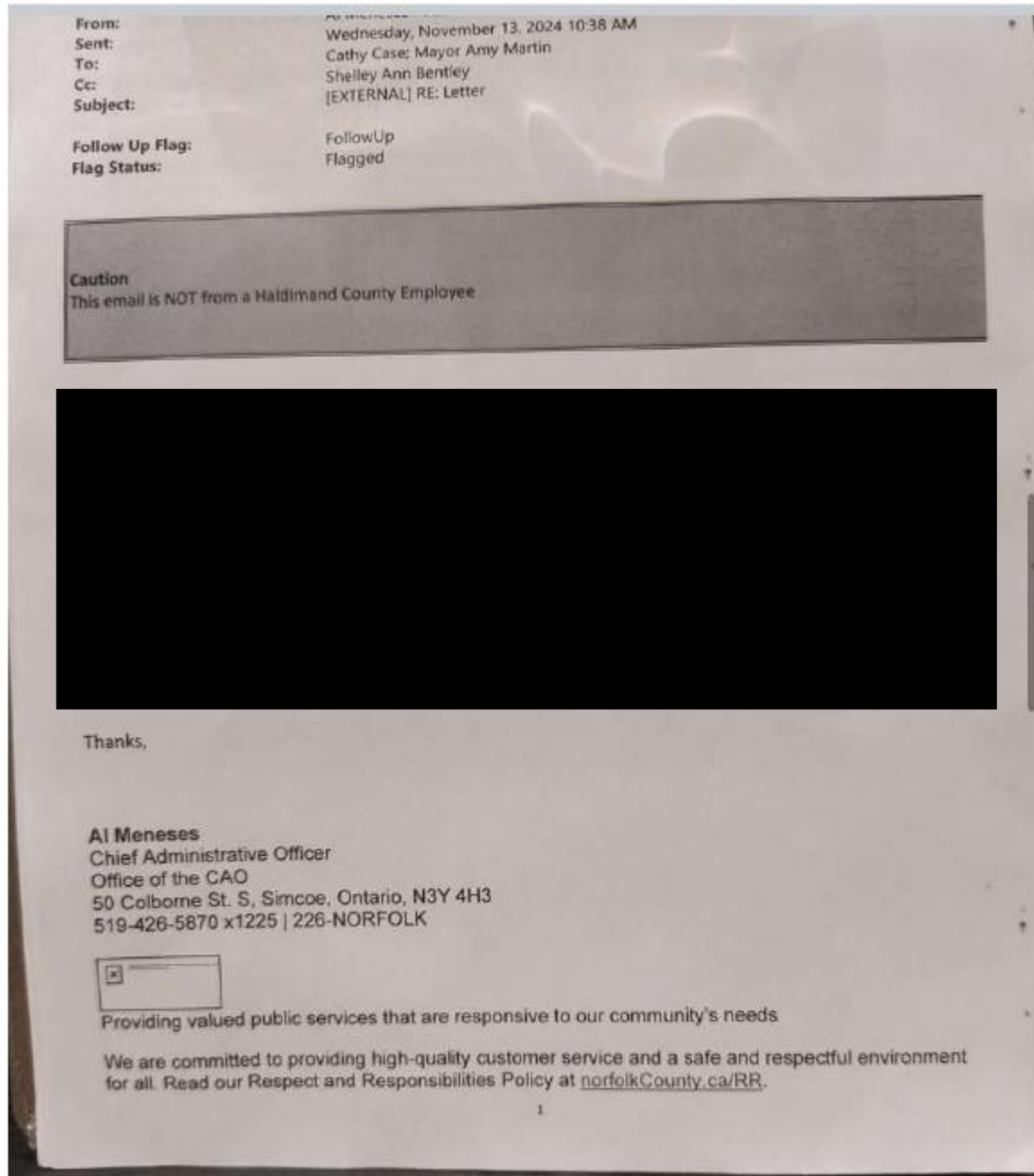
[133] It is beyond dispute that the standard of proof of violation of both municipal codes of conduct and the MCIA is the civil standard of balance of probabilities, meaning “is it even just slightly more likely than not that a violation has been established?”³⁴ This is in contrast to the much more rigorous “beyond a reasonable doubt” standard applicable to criminal prosecutions.

³³ This is discussed in para. 129 regarding the “reasonable person” test to determine whether information is communicated in confidence. For an application of this principle, see *Seyedi v Nexen Inc.*, 2016 ABCA 24 at paras [19 to 24](#). The corollary proposition is true, in that, simply marking something confidential does not necessarily render it so: see *Rural Municipality of Maple Creek No. 111 (Re)*, 2020 CanLII 38070 (SK IPC) at [para 17](#).

³⁴ See *F.H. v. McDougall*, 2008 SCC 53 (CanLII), [2008] 3 SCR 41 at [paras 40 and 45-49](#); *The Corporation of the Townships of Brudenell, Lyndoch and Raglan (Integrity Commissioner) v. Andrea Emma Budarick*, 2021 ONSC 7635 (CanLII) at [para 60](#) (burden of proof for MCIA);

The Documents Were Printed Within Haldimand County

[134] Mr. Horner concluded that the documents depicted in the Post were printed from a Haldimand County recipient. He arrived at this conclusion because an email chain dated November 13, 2024 depicted in the Post sent by Mr. Meneses (Norfolk County) included an email stating “Caution This email is NOT from a Haldimand County Employee.”³⁵



November 13, 2024 email from Al Meneses to Cathy Case & Mayor Martin

³⁵ Glacis Report at pg 9.

[135] Given that the November 13, 2024 chain is numbered “1”, Mr. Horner concluded that it must be the first email in the chain. This is supported by further emails marked as “2” and so forth.

[THIS SPACE HAS BEEN INTENTIONALLY LEFT BLANK]

From: Cathy Case <ccase@haldimandcounty.on.ca>
 Sent: Tuesday, November 12, 2024 4:24 PM
 To: Al Meneses <Al.Meneses@norfolkcounty.ca>; Mayor Amy Martin <Amy.Martin@norfolkcounty.ca>
 Cc: Shelley Ann Bentley <sbentley@haldimandcounty.on.ca>
 Subject: Letter

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.



Cathy Case
 Chief Administrative Officer
 Haldimand County Administration Building
 53 Thorburn St. S., Cayuga, ON N0A 1E0
 Phone: 905-318-5932 x6308 Web: HaldimandCounty.ca

DISCLAIMER: This e-mail and any attachments may contain personal information or information that is otherwise confidential. If you are not the intended recipient, any use, disclosure or copying of any part of it is prohibited. Haldimand County accepts no liability for damage caused by any virus transmitted in this message. If this e-mail is received in error, please immediately reply and delete or destroy any copies of it. The transmission of e-mails between an employee or agent of Haldimand County and a third party does not constitute a binding contract without the express written consent of an authorized representative of The Corporation of Haldimand County.

Disclaimer: This e-mail and any attachments may contain personal information or information that is otherwise confidential and it's intended for the exclusive use of the intended recipient. If you are not the intended recipient, any use, disclosure or copying of any part of it is prohibited. Norfolk County accepts no liability for damage caused by any virus transmitted in this message. If this e-mail is received in error, please immediately reply and delete or destroy any copies of it. The transmission of e-mails between an employee or agent of Norfolk County and a third party does not constitute a binding contract without the express written consent of an authorized representative of The Corporation of Norfolk County.

Email dated November 12, 2024 from Cathy Case to Al Menses and Mayor Martin. Mayor Bentley is carbon copied.

[136] This conclusion is further supported by the fact that copies of the documents depicted in the Post that the Mayor uploaded to her Mayoral Facebook page are identical to the version depicted in the Post, including containing the Header “This email is NOT from a Haldimand County employee”:

Shelley Ann Bentley

From: Al Meneses <Al.Meneses@norfolkcounty.ca>
Sent: Wednesday, November 13, 2024 10:38 AM
To: Cathy Case; Mayor Amy Martin
Cc: Shelley Ann Bentley
Subject: [EXTERNAL] RE: Letter

Follow Up Flag: FollowUp
Flag Status: Flagged

Caution
 This email is NOT from a Haldimand County Employee

Hi Cathy and thank you for your update.

Al Meneses
 Chief Administrative Officer
 Office of the CAO
 50 Colborne St. S, Simcoe, Ontario, N3Y 4H3
 519-426-5870 x1225 | 226-NORFOLK



Providing valued public services that are responsive to our community's needs

We are committed to providing high-quality customer service and a safe and respectful environment for all. Read our Respect and Responsibilities Policy at norfolkCounty.ca/RR.

[137] In summary, we agree with the conclusion in the Glacis Report that the photographed documents comprising the Post originated within Haldimand County.

The Documents Comprising the Post Were Printed on February 18, 2025 By Mayor Bentley's Executive Assistant

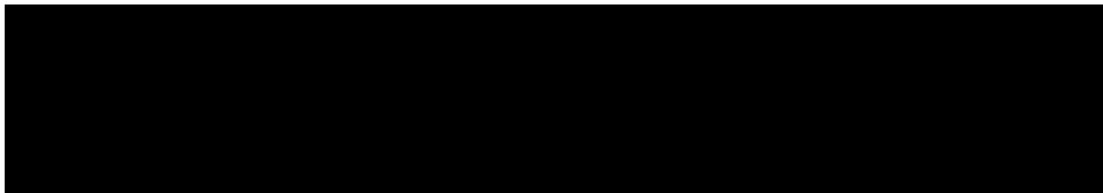
[138] As stated above, the letter from Mayor Martin dated November 6, 2024 was printed and depicted in the Post. Mayor Martin and recipients of this letter advised that it was sent in Word format. The Word document template Mayor Martin used to draft the letter automatically updated a date-heading to reflect the date on which the template was opened.

[139] This heading of the letter, as depicted in the Post, is reproduced below:



[140] My office received a copy of the November 6 letter in its original Word format and was able to confirm that the date-heading automatically updated to the date when the document was opened by my office:

[Addressee]
August 25, 2025
Page 2



[141] Mr. Horner concluded that the auto-populated date in the letter depicted in the Post suggests that it was accessed and printed on February 18, 2025. We agree with this conclusion. Given that Kendle Columbus swore that she printed the documents in mid-February, 2025, we further conclude that Ms. Columbus printed the documents that are depicted in the Post on February 18, 2025.

Findings Regarding Who Leaked the Confidential Documents Comprising the Post

[142] I make the following findings on balance of probabilities:

- Mayor Bentley had both a professional and personal/friendship relationship with MPP Bobbi Ann Brady as of February 2025;

- Mayor Bentley supported MPP Brady’s campaign to be re-elected as the Member of Provincial Parliament for the riding of Haldimand-Norfolk as an Independent candidate in the 2025 Provincial election;
- Mayor Bentley was upset and annoyed at Norfolk County Mayor Amy Martin for removing her from the Haldimand-Norfolk Board of Health Merger Committee in November 2024;
- Mayor Martin was the Conservative candidate for the provincial riding of Haldimand-Norfolk in the 2025 Provincial election;
- The 2025 Provincial election was called on January 28th and was held on February 27th, 2025;
- MPP Brady’s Facebook post in November 2024 during the height of the controversy between Haldimand and Norfolk Counties over the Boards of Health merger that “maybe the people of Haldimand need to know how [Mayor Martin] is trying to disadvantage them at a few tables she sits around. Time will tell” was a direct reference to the controversy over Mayor Bentley’s membership on the Merger Committee and was informed by the disclosure of confidential information related to the controversy by her friend and political ally, Mayor Bentley;
- The documents forming the Post could be construed as showing Mayor Martin to be dismissive of Haldimand County’s interests with respect to the Boards of Health merger and matters of public health generally, and might cast Mayor Martin in a negative light with Haldimand County voters in the Provincial election;
- The purpose of posting the Post was to attempt to harm Mayor Martin’s electoral chances in the Provincial election. That is clear from the Post’s title: “Norfolk county staffer proving Amy Martin’s disdain for Haldimand county.” It is also clear from the timing of the attempted Post, on the eve of the election. It ultimately had no impact because the Post did not get approved and put up as an anonymous post until the day after the election despite Mr. Liscombe having submitted the post to Dunnville Talks the day before the election. As Mr. Liscombe noted in relation to this timing, “there are no coincidences”;
- The Post was made to only one website, Dunnville Talks, which was a forum dealing with Haldimand County issues and whose readers would be largely Haldimand County residents;³⁶

³⁶ See Appendix A for a screenshot of the “About this group” section of Dunnville Talks, which describes itself as “A group for things of interest to Dunnville and region residents. Suggestions, complaints, events and other things which you feel your neighbours would be interested. Hopefully some of the members will volunteer for causes and events and get involved.” Dunnville is an unincorporated community located in Haldimand County.

- The documents forming the Post were photos of hardcopies of the documents, not electronic copies that had been electronically forwarded. Mr. Liscombe admitted that he took the photographs of hard copies of the documents that formed the Post and posted those photographs;
- The documents forming the Post that were photographed by Mr. Liscombe had been printed out within Haldimand County on February 18, 2025, in the middle of the Provincial election campaign;³⁷
- Mayor Bentley requested her EA, Kendle Columbus, to print out documents related to the Boards of Health merger in mid-February 2025. As admitted by Mayor Bentley, the documents Ms. Kendle printed out included all of the documents that appeared in the Post;
- The documents forming the Post originated from the photocopies Mayor Bentley had requested her EA to print out. There is no evidence of anyone else on the Haldimand County side having made photocopies of these documents. Furthermore, neither Ms. Case nor Ms. Columbus had any reason to print out these documents, such as a motive to benefit MPP Brady or harm Mayor Martin like Mayor Bentley did. They further deny disseminating these documents to anyone outside of Haldimand County, which I accept. In fact, Ms. Case took active measures to get the Post taken down and Ms. Columbus voluntarily came forward after learning about the Glacis investigation to advise of her role in photocopying the documents that comprised the Post at the request of Mayor Bentley;
- I reject Mayor Bentley's explanation that she printed out the Merger-related documents that were included in the Post because they were "important." The Merger had taken place months earlier and the documents in question related merely to process, not any substantive matter related to the Merger, such that they had no ongoing importance to policy or administration from any rational standpoint. I find that the purpose for printing out these documents was to be able to use them against Mayor Martin and to assist MPP Brady in the Provincial election campaign;
- The poster of the Post, Mike Liscombe, was a good friend of Mayor Bentley's spouse, Rick Beaudet, and a friend of Mayor Bentley as well;
- Mr. Liscombe and Mr. Beaudet clearly had great disdain for Mayor Martin as is apparent from their text messages during the election campaign. I have already found that Mayor Bentley bore significant animosity and resentment toward Mayor Martin;

³⁷ I agree with the analysis and reasoning leading to these conclusions as set out on pp. 7-8 and 9-10 of the Glacis Report.

- I reject Mr. Liscombe’s explanation that he obtained the documents from a “mystery woman” as he claimed in my examination of him. He admitted this explanation is very different than his original story of having found them and screenshotted them from another website that he told to a reporter shortly after the controversy over the Post first arose. Furthermore, the notion that some woman dropped the documents off who he did not recognize and cannot describe beyond gender is simply preposterous;
- I am unable to make a finding about how precisely Mr. Liscombe came into possession of the documents that formed the Post; however, I do find that he either received them from Mr. Beaudet, possibly on February 25th when they admittedly met up, which was the day before the Post was submitted to Dunnville Talks, or, less likely, directly from Mayor Bentley.³⁸ I find that either way, Mayor Bentley was fully behind their transmission to Mr. Liscombe for the purpose of posting them on a website accessed by Haldimand County residents for the purpose of harming Mayor Martin’s chances and increasing MPP Brady’s chances in the Provincial election;
- Although Mayor Bentley stated that she would leave the Post documents in a wheely-cart in a closet or cabinet in her office when she was at home which Mr. Beaudet had access to, based on the impression I formed of their relationship from both of their examinations, I reject the notion that Mr. Beaudet would unilaterally and surreptitiously take the documents without Mayor Bentley’s knowledge or approval. I find that to the extent Mr. Beaudet was the one who physically gave Mr. Liscombe the documents, he did so with not only the knowledge and approval of Mayor Bentley but likely also her encouragement;
- The Post was submitted by Mr. Liscombe to the Administrator of the Dunnville Talks Facebook page on February 26th, was posted at ~9:00 am on February 28th and was taken down about 3 hours later, around 12 pm on February 28th at the request of former Haldimand County CAO, Cathy Case;
- On May 20, 2025, Mr. McKaig, Haldimand County’s external legal counsel, reviewed the Glacis Report with Members of Haldimand Council. Mayor Bentley was present at the meeting. In response to a question from Cllr. Rob Adams (partner of Bobbi-Ann Brady)³⁹ about whether the documents were really confidential given they were not stamped “Confidential”, Mr. McKaig

³⁸ It is possible that in now attributing his receipt of the documents forming the Post to a “mystery woman” that Mr. Liscombe was injecting an element of truth into what was otherwise a lie if it had been Mayor Bentley who delivered the documents to him.

³⁹ MPP Brady is referred to as Cllr. Adams’ “partner” in the following article: Mike Renzella, “Brad Adams wants to be the voice of the people in Ward 4”, *The Haldimand Press* (March 13, 2025), online: <https://haldimandpress.com/brad-adams-wants-to-be-the-voice-of-the-people-in-ward-4/>.

stated emphatically that it was apparent from the content of the documents that they were confidential in nature;

- Despite hearing Mr. McKaig’s opinion that the documents were indeed confidential, 6 days later, on May 26th, Mayor Bentley provided the documents forming the Post to the Hamilton Spectator and posted them on her official Mayoral Facebook page where they remain up to this day.

Did Mayor Bentley Breach S. 6 of the Haldimand County Council Code of Conduct?

[143] Based on the foregoing findings, I conclude that Mayor Bentley breached s. 6.2 of the Haldimand County Code of Conduct in that she “disclosed or released by any means to any member of the public, any confidential information [as I have found the documents were] acquired by virtue of their office” without lawful justification or excuse.

[144] I further find that Mayor Bentley breached s. 6.3 of the Code of Conduct in that she “used confidential information for ... other gain of ... any person...” in that she provided the documents to Mr. Liscombe knowing he would post them for the purpose of providing a “gain” or benefit to MPP Brady by attempting to assist her in her chances of winning the 2025 Provincial election in the riding of Haldimand-Norfolk.

[145] The Post was up for approximately 3 hours on February 28th before it was taken down by the Dunnville Talks Facebook page Administrators. Because the Post was taken down, according to the site’s Moderator, Mr. McMahon, it is no longer possible to determine the number of views it garnered; however, the Moderator estimated based on experience that it would have likely garnered between 100 and 300 views in the 3 hours it was up based on his experience with other, similar posts. I find, based on authority,⁴⁰ especially given the likelihood that there were relatively few views of the Post in the short time it was up and the fact the person behind the original Post was the one who later republished the Post, that the documents did not lose their confidentiality as a result of their being the content of the original Post. Based on this, I find that Mayor Bentley committed two additional, independent violations of s. 6.2 of the Haldimand Code of Conduct in providing these confidential documents to the Hamilton Spectator and posting them on her Mayoral Facebook page.

Did Mayor Bentley Breach the MCIA and s. 9 of the Code of Conduct?

[146] A final issue, raised by the private citizen Complaint, is whether, in chairing the May 26, 2025 meeting and not declaring a pecuniary conflict prior to the debate over whether the issue of the disclosure of the documents forming the Post should be referred to the Integrity Commissioner, Mayor Bentley breached the MCIA and s. 9 of the Code of Conduct.

[147] The Glacis Report did not make a finding that Mayor Bentley was behind the disclosure of the documents that formed the Post but it certainly pointed an accusatory finger at her. In addition,

⁴⁰ There is a dearth of authority on this issue in Canadian caselaw. Authority from Australia dealing with this issue considers, among other things, whether prior publication is of “limited, transitory or impermanent nature.” If so, prior publication will be insufficient to remove their confidential nature: see *Chief Commissioner of Police v The Herald & Weekly Times* [2014] VSC 156.

given my findings, I find that she was aware at the time of the subject Council meeting that she was the one who disclosed confidential information to a member of the public with the intent of having it used to undermine Mayor Martin's candidacy in the 2025 Provincial election.

[148] In these circumstances, did Mayor Bentley have a "pecuniary interest" that ought to have led her to declare such an interest and have no involvement in the debate on the issue? In my opinion, the answer is no. Had she thought the matter through, Mayor Bentley would have realized that there was a chance that an IC investigation would take place that might result in a finding that she breached the Code of Conduct for disclosing confidential information and might result in a recommendation that a pecuniary penalty of a suspension of her remuneration as a Member of Council be imposed. I find that this interest falls within the exception to having to declare a pecuniary interest set out in s. 4(k) of the MCIA in that the interest was "too remote or insignificant in its nature that it cannot reasonably be regarded as likely to influence the member." In fact, Mayor Bentley was on record as supporting an IC investigation into the leak that led to the Post.

[149] For these reasons, I find that Mayor Bentley's actions in respect of the May 26 meeting did not violate the MCIA or s. 9 of the Haldimand County Councillor Code of Conduct and I dismiss this Complaint.

Appropriate Penalty

[150] The confidentiality provisions of the Code of Conduct are fundamental to the effective operation of municipal government. This is underscored by the fact that the requirement of maintaining confidentiality over sensitive documents is one of the 4 core tenets required, pursuant to s. 1 of O. Reg. 55/18 promulgated pursuant to s. 223.2 of the *Municipal Act, 2001*, to be incorporated into every Code of Conduct for Members of Council in the Province.

[151] Aggravating factors in terms of the breaches include the following:

- Mayor Bentley released the documents to a private citizen for the purpose of having them used against a candidate in a Provincial election in order to benefit another candidate who she favoured;
- She has refused to admit that she was the one who leaked the documents that formed the Post, leading to considerable, unnecessary expense to both Haldimand County and Norfolk County taxpayers for the cost of the Glacis Report and to Haldimand County taxpayers alone for the cost of my Report. Had she admitted she was the one who leaked the documents at the outset, all of that expense could have been avoided;
- Mayor Bentley never sought my confidential advice as Integrity Commissioner concerning whether the documents I have found she leaked were confidential before she facilitated their release to the public;
- After hearing from Haldimand County's own lawyer who stated emphatically that the documents forming the Post were confidential, she nevertheless went

ahead and provided them to the Hamilton Spectator and posted them on her Mayoral Facebook webpage;

- While Mayor Bentley has taken the position that the documents forming the Post were not confidential, it begs the question as to why she did not simply produce the documents openly at the time and why Mr. Liscombe sought anonymity as a condition of making the original Post. To my mind, these facts demonstrate a collective understanding that they knew what they were doing was wrong.

[152] In the circumstances, I recommend the following penalties pursuant to the Code of Conduct:

- A 60 day suspension of pay for the initial violation which lead to the leak of the confidential documents to Mr. Liscombe and the original Post, including for the fact that it was done with the intent of benefiting MPP Brady and harming Mayor Martin in the election, which is a separate, independent breach of the Code of Conduct;
- A further 30 day suspension of pay for each of the leaking of the documents to the Hamilton Spectator and the posting of the said documents on her Mayoral Facebook page, for a total of 60 additional days' suspension of pay;
- The total suspension of pay recommended for the four independent Code of Conduct violations I have found is therefore 120 days;
- That Mayor Bentley issue a public apology to Norfolk County Mayor Martin for leaking the confidential documents for the purpose of attempting to damage Mayor Martin's prospects in the 2025 Provincial election.

[153] This concludes my investigation.

Respectfully Submitted,



David G. Boghosian
Integrity Commissioner,
Haldimand County

DGB/sg/ka

APPENDIX “A”

Group by Ryan McMahon

Dunnville Talks

Private group · 14.2K members · AI enabled

Join group

Share

About

Discussion

About this group

A group for things of interest to Dunnville and region residents. Suggestions, complaints, events and other things which you feel your neighbours would be interested. Hopefully some of the members will volunteer for causes and events and get involved.

There are few things more annoying than someone adding you to a group without asking, so please tell your friends about us, don't just add them. Please do not promote commercial businesses there are several local buy and sell groups for that.

Please read all the comments to a post before you post so you understand what is going on..

Please keep any political or religious discussions civil and polite. [See less](#)

Private

Only members can see who's in the group and what they post.

Visible

Anyone can find this group.

History

Group created on January 23, 2018. Name last changed on January 25, 2018. [See more](#)

Dunnville, Ontario

Members · 14.2K

Ryan is an admin. Andrew and Kayla are moderators.