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January 5, 2026

VIA EMAIL (Kevin.Klingenberg@caledon.ca)

Mayor and Members of Council
c/o Kevin Klingenberg, Town Clerk
The Corporation of the Town of Caledon
6311 Old Church Road
Caledon, Ontario
L7C 1J6

Dear Mayor and Members of Council:

**RE: 2025 ANNUAL REPORT OF THE INTEGRITY
COMMISSIONER, TOWN OF CALEDON
Our File No. 975-100**

I am pleased to submit my annual report for my second term as your Integrity Commissioner, covering the period of January 2, 2025 – January 2, 2026.

Code of Conduct Complaints and Investigations

I investigated and reported on 4 Complaints during this reporting period, summarized as follows:

- Complaint 25-001 – Complaint by CAO Hyde against Cllr. Sheen on behalf of staff regarding comments made by Cllr. Sheen potentially affecting 2 identifiable staff persons at a Council meeting held on May 20, 2025 in relation to the discussion of a fill permit re: 0 Shaw's Creek Road. Code of Conduct violation found and penalty of suspension of pay for 15 days and a requirement to apologize to the two affected staff persons imposed;
- Complaint 25-002 – Complaint by Mayor Groves against Cllr. Sheen for comments made about her during the Council meeting held on May 20, 2025 in relation to the discussion of a fill permit re: 0 Shaw's Creek Road. Code of Conduct violation found and penalty of suspension of pay for 15 days and a requirement to apologize to Mayor Groves imposed;
- Complaint 25-003 – Complaint by Cllr. Sheen against Mayor Groves regarding statements made by the latter during an interview for a news article regarding the actions of unidentified staff in relation to the fill permit motion re: 0 Shaw's

Creek Road. Code of Conduct violation found but in light of the trivial nature of the breach, no penalty imposed;

- Complaint 25-004 – Complaint by Cllr. Sheen against Mayor Groves for comments made by the latter in a letter published in a news outlet regarding the Town's budget process. Code of Conduct violation found but in light of the trivial nature of the breach, no penalty imposed.

In addition to the foregoing Complaints that I investigated and reported on, I summarily dismissed 3 other Complaints, all against the same Member of Council, all in relation to comments made at either Committee or Council meetings, without conducting an investigation or issuing a report.

I received another Complaint from someone who was not the “victim” of the actions of the Member of Council in question. Upon contacting the affected person, they advised that they did not wish to pursue a Complaint and would not cooperate with any investigation I undertook. I therefore suspended the investigation.

I further fielded a lengthy telephone call in late October from an individual who described certain conduct on the part of several Members of Council in detail and indicated a desire for their actions to be investigated. I told him that in order for me to investigate, a formal Complaint in writing would need to be filed with the Clerk's office, which would remain confidential. A written complaint from this individual has not materialized to date.

I declared a conflict of interest in respect of a Complaint against Cllr. Sheen regarding directions he purported to give to the Town Clerk in respect of the handling of my Reports re: Complaints 25-003 and 25-004. I determined that there was an appearance of conflict of interest as I had been a party to the communications giving rise to this Complaint. I understand this matter has been referred to the Region of Peel Integrity Commissioner for investigation.

I also advised Council that in light of threats made toward me by Cllr. Sheen in the same series of emails giving rise to the Complaint that has been referred to the Region of Peel Integrity Commissioner, which I considered to meet the definition of criminal intimidation, I would be referring this matter to the police for investigation. I initially contacted Peel Regional Police who referred me to the OPP Caledon detachment, who in turn referred me to the Toronto Police Service, where I was finally able to file a formal complaint.¹ Toronto Police investigators advised me that while Cllr. Sheen's statements may well satisfy the definition of criminal intimidation, due to limited personnel resources, Toronto Police's policy is to only lay criminal intimidation charges where there has been a threat of physical violence or financial harm. I was advised that Toronto Police would be speaking with Cllr. Sheen. I did not follow up with them regarding whether that contact ever occurred or what the nature of any contact was.

¹ The OPP advised that the appropriate police service to lodge a complaint was the service for the jurisdiction where I work and live, being Toronto, not the jurisdiction in which the person complained of resides.

I currently have no COC complaint investigations in progress.

Requests for Advice

I fielded five requests for advice from councillors, three concerning potential conflicts of interest situations related to specific matters that were to be considered by Council and two relating to potential Code of Conduct issues. I also fielded three requests for advice from members of the public who wished to know whether certain conduct they had observed constituted a Code of Conduct violation.

Gifts or Benefits Disclosure

I did not receive any Gifts or Benefits Disclosure Statements pursuant to s. 6.5 of the Code of Conduct during this reporting period.

Education

I was not asked to and therefore did not conduct any MCIA/Code of Conduct/Integrity Commissioner training in 2025.

Code of Conduct Review and Update

As explained in my last Annual Report, we had commenced and made some progress in undertaking a comprehensive review of the Town's Code of Conduct together with the Town Solicitor, Stephen Dickson; however, at our recommendation, this review was suspended following the announcement by the Minister of Municipal Affairs at the 2024 AMO conference in the latter part of August 2024 that a universal code of conduct governing all Ontario municipalities would soon be promulgated. Despite this statement, when Bill 241 (*Municipal Accountability Act, 2024*) was tabled on December 8, 2024, it did not contain terms of a model code of conduct; instead, it proposed that, if passed, the Lieutenant Governor-in-Council was authorized to draft a universal code of conduct. Bill 241 died when the Legislature was prorogued in advance of the February 2025 provincial election.

Since the last provincial election, the government has introduced Bill 9 (*Municipal Accountability Act, 2025*), which largely tracks the provisions of Bill 241. Bill 9 is currently at the second reading/committee review stage.

Given that it appears the Ontario Legislature is continuing to move toward establishing a standard code of conduct for all Ontario municipalities, we recommend that a review of Caledon's Code of Conduct continue to be suspended until it is determined whether a province-wide Code of Conduct for municipalities will be adopted.

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

Yours very truly,

A handwritten signature in blue ink, appearing to read "D. Boghosian", with a long horizontal flourish extending to the right.

David G. Boghosian.
Integrity Commissioner,
Town of Caledon

DGB/dgb/ka