

# **CITY OF GREATER SUDBURY INTEGRITY COMMISSIONER, DAVID G. BOGHOSIAN**

**Citation:** Complaint re: Councillor Landry-Altmann (Flour Mill CAN April 8, 2024 Meeting) – DGB-Greater Sudbury ICI-2024-02

**Date:** July 10, 2024

## **REPORT ON COMPLAINT**

### **Introduction**

[1] On April 15, 2024,<sup>1</sup> I received a Complaint from a complainant who wishes to remain anonymous (“the First Complainants”) concerning the conduct of Councillor Joscelyne Landry-Altmann at a Flour Mill Community Action Network (“CAN”) public meeting held on April 8, 2024 (“the Meeting”) which was alleged to violate s. 18.(1) of the Greater Sudbury Code of Conduct for Members of Council and Local Boards (“COC”, “Code of Conduct” or “Code”).

[2] On May 17, 2024, I received a second complaint co-signed by 4 other individuals (“the Second Complainants”) concerning the conduct of Councillor Landry-Altmann at the Meeting, alleging more extensive breaches of the Code of Conduct than the First Complaint.

[3] As both Complaints essentially concerned the same subject-matter, I am dealing with them together in this Report. The earlier-received Complaint will be referred to herein as “the First Complaint” and the later-received Complaint will be referred to herein as “the Second Complaint.”

### **Complaints**

#### **First Complaint**

[4] The First Complainant stated that at the April 8<sup>th</sup> public meeting of the Flour Mill CAN, there was a discussion about concerns related to the Sudbury Centre for Transitional Care (“SCTC”). Cllr. Altmann assumed the role of Chair of the meeting (notwithstanding that she is neither the elected Chair or Vice-chair of the Flour Mill CAN and notwithstanding that the Chair was present at the meeting) at least during the discussion of the SCTC issue. She was said to have barred a member of the press from being present at the meeting, told attendees they could not record the meeting and denied Jehnna Morin, the director of SCTC, the opportunity to address those in attendance.

[5] The Complaint also attached a link to a Sudbury.com article about the meeting titled “[Flour Mill drop-in centre has neighbours concerned, fearful.](#)” In the article, its author, Jenny Lamothe, states that there were approximately 70 individuals present at the meeting. With respect to the

---

<sup>1</sup> The Complaint was first sent to me by email directly from the Complainant on April 15th but unbeknownst to me, it went into my Junk folder and I did not realize it until the Complainant sent a follow up email to me on May 13, 2024, which did make it into my Inbox. This latter email is what precipitated my review of the Complaint.

SCTC, residents and business owners expressed concerns at the meeting about safety as a result of several incidents associated with the Centre.<sup>2</sup> Attendees were required to complete a questionnaire upon arrival which she felt contained questions that invited complaints about the SCTC. She states that she was denied entry into the meeting by Cllr. Landry-Altman on the basis that reporters were not allowed to attend and that a blank questionnaire that attendees were asked to fill out was taken away from her; however, she indicates in the article that she viewed several videos of the meeting and observed Cllr. Landry-Altman telling attendees that they could not record the meeting and initially allowing Ms. Morin to speak then reneging on that permission and not letting her speak but then ultimately letting her speak at the end of the SCTC discussion. She also states that Cllr. Landry-Altman can be heard on the video stating “We don’t need the slant of some media person who wasn’t invited.”

[6] The First Complainant did not stipulate a particular section of the Code of Conduct that had been breached but it became apparent to me that the alleged breach concerned s. 18.(1) of the Code of Conduct, relating to adherence to by-laws, policies and procedures adopted by Council.

### **Second Complaint**

[7] I will not repeat the aspects of the Second Complaint where it overlaps the First Complaint.

[8] The Complaints asked to be identified as being the proponents of this Complaint. They are Jehnna Morin, Executive Director, SCTC; Evie Ali, Executive Director, Go Give Project; Carly Gasparini, Executive Director, Community Builders; and Jackie Balleny, Executive Director, Sudbury District Restorative Justice.

[9] The Complainants state that notice of the April 8<sup>th</sup> meeting was not widely circulated; rather, the Chair of the Flour Mill CAN and Cllr. Landry-Altman personally visited a select number of local businesses and residents and handed out a flyer advising of the meeting. It was alleged that this CAN meeting was not open to the public, participants were selected by the Chair and Councillor to attend to the purposeful exclusion of other residents and businesses, and that this demonstrated a blatantly unethical abuse of integrity, accountability, transparency and improper use of the influence of the duty of a CAN Chairperson and the office of a City Councillor.

[10] The Complaint further alleged that all attendees were required to complete an attendance form by submitting their full name, address, phone number and email. This personal data was collected as a condition of attendance and attendees who did not want to provide this information were informed by Cllr. Landry-Altman that they must leave. Furthermore, only confirmed residents and businesses of Ward 12 were given a paper survey to complete.

[11] I was provided with a copy of the survey, which was comprised of one letter-sized sheet of paper setting out a series of questions each followed by spaces to write responses. Questions in the survey included the following:

---

<sup>2</sup> Notably, two Greater Sudbury Police officers in attendance indicated that crime statistics did not bear out the expressed concerns about increased crime associated with the SCTC.

- Please describe what has happened to your residence, quality of life in the past year, 6 months or 2 months? Have you noticed an escalation of concerns/criminality?
- Are thinking of moving out?
- What are the changes that you would like to see that would convince you otherwise?

[12] At the end of the survey, there was a space to sign and date the survey, however, it stated that this was only to be done if the responder consented to having their responses shared with City Council. While there were spaces to write in one's full name, address, phone number and email address at the beginning of the questionnaire, the word "(optional)" was written beside the lines asking for the responder's name and address, although not opposite the lines requesting phone number and email particulars.

[13] Prior to the start of the meeting, Claude Charbonneau, introduced himself as the Chair of the Ward 12 CAN and the purpose of the meeting. He began by stating that he was committed to "making the neighbourhood a better place." He continued by sharing the purpose of the meeting saying that "we are here because we have concerns about these people in our neighbourhood." He then proceeded to tell everyone in attendance that the meeting was being audio recorded for the purposes of allowing City Council and senior administration officials to hear what went on and what was said. At this point, Cllr. Landry-Altman spoke out and stated to the attendees that "if you don't want to be recorded – you can leave the meeting." The Complainants claimed some unidentified person had made a "FOI request" for the audio recording of the meeting but was told that no such recording existed.

[14] It was alleged that at the meeting, Cllr. Landry-Altman used her authority and influence for the purpose of intimidating, threatening, coercing members of the public in attendance that did not share her opinions, and that "her privileged and biased focus on issues of substance use and homelessness suggested that she is not considering the interests of all members of the public when making decisions."

[15] It was also alleged that during the meeting, attendees used hurtful, stigmatizing and disrespectful language to describe the clients of SCTC, including 'druggo guy', 'derelicts', 'sickos', 'our country', 'zombie time', 'they are a bunch of spiders', 'zombies are untouchable', 'let's start pushing back', 'cracked out', 'vagabonds', 'that place', 'they are rats – if you feed them they come', 'I'm going to carry a crowbar up my shirt', 'every time you drive by start honking your car horns' and 'harass them back', all without any interruption or objection by Cllr. Landry-Altman or CAN Chair Charbonneau.

[16] The Complainants claim that repeatedly throughout the meeting, Cllr. Landry-Altman refused to allow the Executive Director, staff or clients of the SCTC to speak in rebuttal to the foregoing malicious, false, and reckless statements made by members of the public; that the Councillor frequently exhibited an arrogant sense of power and entitlement in arbitrarily determining who could speak and when. At one point she stated that only residents and business owners of Ward 12 could speak, even though the Councillor herself is not a permanent resident of Ward 12. They state that Councillor Landry-Altman used her authority and influence for the purpose of bullying and intimidating any speaker who wished to speak and share information and lived experience about the SCTC. Out of 40 persons who spoke at the meeting, the SCTC Executive Director of the SCTC was only allowed to speak as the 37<sup>th</sup> speaker.

[17] The Complainants asked that I investigate their Complaint with respect to the following alleged misconduct against both Cllr. Landry-Altmann and Flour Mill CAN Chair, Claude Charbonneau:

1. Inappropriate collection of personal and private information contrary to MFIPPA;
2. Demonstrated lack of adherence to the Terms of Engagement for CANs.
3. Breach of the Schedule “A” By-law 2019-16 Code of Conduct:
  - Section 2: Application of the Code of Conduct
  - Section 4: General Principles: 1,2,3,4,5
  - Section 6: Confidential Information: 1,4
  - Section 12: Conduct in Office, Including at Council and Committees: 1,2
  - Section 13: Improper Use of Influence: 1,2
  - Section 14: Conduct Respecting City Employees: 3,6
  - Section 15: Discreditable Conduct: 1ab,2
  - Section 16: 1,2,3

[18] I advised the Complainants shortly after receiving their Complaint that I was unable to investigate the first alleged breach on the basis that both s. 223.8 of the *Municipal Act, 2001* and s. 21(3)(b) of the Greater Sudbury Code of Conduct for Councillors expressly prohibit me from investigating complaints related to MFIPPA, and I directed them to the City Clerk as per s. 21(3)(b) of the COC.

[19] Within the body of the Complaint, there were also references to breach of the Ontario Human Rights Code, although no express request was made that I investigate any such breaches. I have not investigated any such breaches as this is outside my jurisdiction as per s. 223.8 of the *Municipal Act, 2001*.

[20] For the reasons set out in paragraphs [57] - [70] below, I determined that I have no jurisdiction to investigate the conduct of Claude Charbonneau such that I did not ask him for a Response to the Complaints.

### **Response of Councillor Landry-Altmann**

[21] On May 15, 2024, I passed on the particulars of the First Complaint, but not the identity of the complainant, to Cllr. Landry-Altmann by email. I passed on the Second Complaint, which identified its proponents, to Cllr. Landry-Altmann by email on May 21, 2024.

[22] On June 20, 2024, I received Cllr. Landry-Altmann’s Response to the two complaints. It consisted of a narrative portion together with 16 multi-document exhibits, totaling 201 numbered pages.<sup>3</sup> The following is my summary of that extensive material:

---

<sup>3</sup> The page count is misleading as many pages were double-sided but only the front-facing page was numbered. There was at least 300 pages of material provided by the Councillor in total.

### **Lead Up to April 8<sup>th</sup> Meeting**

- The City signed a contract to fund SCTC on March 4, 2024. SCTC’s hours were temporarily extended from 9:30 am- 3:30 pm to 8:30 am – 8:30 pm around this same time due to a federal grant surplus that was in place until April 30<sup>th</sup>. The contract was signed by City staff pursuant to delegated authority. Although she was given notice of this development by staff on March 4<sup>th</sup>, neither the Flour Mill CAN, Flour Mill BIA nor Flour Mill residents and businesses were notified of this change. In addition, no new security was added as Ms. Morin informed City staff it was not required;
- Within a week thereafter, Flour Mill residents and business operators were complaining about problems arising as a result of SCTC’s operations. These included concerns about increases in crime (violent crime, vandalism, threats, weapons possession, theft and robbery), drug use, prostitution, lewd behavior and aggressive panhandling. There was also associated debris (eg. feces, urine), garbage and drug paraphernalia. The concerns were not just in the immediate vicinity of the Centre but surrounding parks, roads, sidewalks, alleys, lanes, etc. The Response included many photographs illustrating these concerns. It also included many testimonials from area business operators as well as residents as to the extent of the concerns, the adverse impact they were having on their businesses and families, their fear for their personal safety and that of their families and employees and their concern about damage to their properties;
- A BIA meeting took place on March 20<sup>th</sup> at which the Councillor attended, as did a representative of Greater Sudbury Police Service. It was alleged that there was a consensus at the meeting that both businesses and residents of Flour Mill alike were concerned about the crime and loss of business resulting from the transport from downtown CGS to the Flour Mill (by GO GIVE Project through its Welcoming Streets program, which is funded by CGS<sup>4</sup>) of an “unmanageable volume of the homeless,”<sup>5</sup> and that the location of the “warming centre” (this was a reference to the SCTC) was inappropriate due to its immediate proximity to a “high profile” commercial zone and unsafe (due both to its location on a major transportation artery and within a residential area with many families and young children);
- As a result of these complaints, Cllr. Landry-Altman sought to set up a meeting of the Flour Mill BIA for the Mayor to attend but this did not proceed due to the Mayor’s unavailability;
- The Flour Mill CAN scheduled a special, public meeting to discuss community concerns about the SCTC for April 8<sup>th</sup>. The Councillor advised that the meeting was

---

<sup>4</sup> The Councillor also pointed out in her submissions that GO GIVE/Welcoming Streets Program also receives considerable funding from the Downtown CGS BIA. She asserted in her submissions that the Welcoming Streets Program was directing clients from downtown to the SCTC.

<sup>5</sup> In a slightly later time frame, Cllr. Landry-Altman also accused the Mayor of North Bay (both in person at a municipal conference and in an email exchange which she provided to me as an exhibit to her Response) that his City was bussing members of its homeless population to Sudbury. The North Bay Mayor denied the allegation.

to include BIA members and “the community,” as well as her. In advance of the meeting, she stated that notification of the time, place and issue for discussion at the meeting was provided as follows:

- 200 flyers (bilingual) were printed that were handed out by volunteers in “several areas”;
- On April 5<sup>th</sup>, she and Mr. Charbonneau spent 4-5 hours walking along Notre Dame Ave. from the Food Basics to Lagace’s Variety on both sides handing out flyers to local businesses and listening to their concerns. She stated that they were repeatedly told on this walk that businesses were concerned about the problems in the neighbourhood being published in the media, as it would have a further negative impact on their businesses, so she “gave my word to them as their representative that there would not be media present [at the April 8<sup>th</sup> meeting].” [I note that elsewhere in her submissions, Cllr. Landry-Altman had pointed out that Notre Dame had traffic volume of 37,000 vehicles a day and also that every person going back and forth to work each day along that road witnessed the obvious deterioration of the neighbourhood thanks to the SCTC. These suggest that the problems in the Flour Mill neighbourhood would have been well-known to Greater Sudbury residents generally. I also note that this walk only involved meeting with business owners and employees, not area residents];
- Cllr. Landry-Altman provided a copy of the flyer advertising the meeting. It was titled “Flour Mill Community Action Network (C.A.N.) and Joscelyne Landry-Altman, Deputy Mayor, Councillor Ward 12 Invite you to a Community Meeting.”<sup>6</sup> “Topics to be Discussed” included “Safety concerns expressed by residents and businesses about the Sudbury Transitional Care Centre drop-in centre located at 495 Notre Dame Avenue, as a result of several incidents;”
- Emailed invitations were sent to 25 addresses on the CAN distribution list;
- The meeting was announced at the 11 am Sunday Mass at St. Jean de Brebeuf Church;
- Although this was not mentioned by Cllr. Landry-Altman, I noticed that in response to some pre-April 8<sup>th</sup> emails from residents complaining about the impact of the SCTC on the Flour Mill neighbourhood that she provided to me, the Councillor invited them to attend the April 8<sup>th</sup> CAN meeting;
- She advised that mailing invitations via Canada Post to all Ward 12 residents would cost in excess of \$2,000.00 and would require 2 weeks’ lead time. She

---

<sup>6</sup> Cllr. Landry-Altman suggested at various points in her submissions that this was a joint BIA/CAN meeting. This is contradicted not only by this document but by many other pieces of objective evidence I have reviewed. In any event, if it is even partially a CAN meeting, the requirements of CAN meetings must be followed.

did appear to indicate that this was the normal means of extending invitations to CAN meetings, however, the short notice of the meeting prevented this in the case of the April 8<sup>th</sup> meeting;

- The Councillor indicated that the venue chosen (LIUNA union hall) was almost at capacity with the 80 or so persons who did attend so not many more attendees could have been accommodated even if more persons had been notified and wished to attend.

### **Surveys Completed at the April 8<sup>th</sup> Meeting**

[23] Cllr. Landry-Altman provided me with copies of what she indicated were all of the surveys completed at the meeting. There were 17 in total (6 from businesses and 11 from residents). All of them endorsed the problems they associated with the SCTC as reviewed above, many said they were considering moving out of the neighbourhood due to these concerns and a majority proposed as a solution moving the SCTC out of the neighbourhood, with some suggesting increased law enforcement and clean-up. One thoughtful resident suggested installing a port-a-potty at the back of the SCTC building.

### **Responses to Particular Allegations**

[24] The following is my summary of Cllr. Landry-Altman's responses to the particulars of the Complaints:<sup>7</sup>

- The Meeting was not widely advertised: She believes the notice of the meeting that was provided as set out in para. [22], 5<sup>th</sup> bullet above was adequate;
- The Meeting was not Open to the Public: She essentially reiterated the breadth of advertising of the meeting and the fact that anyone could attend even if they had not received a flyer. She stated that 20 or more supporters of the SCTC, from the SCTC, Go Give and Restorative Justice, "etc.", attended and they were not asked to leave or required to sign in as a condition to staying;
- Barring the press from the Meeting: She admitted that she asked a reporter to leave based on the "word" she gave to business owners that there would be no media so "the information could not be skewed/slanted by a journalist." She specifically admitted stating at the meeting "We don't need the slant of some media person who wasn't invited." She felt it was important for business owners and residents "to present their impact statements in a safe environment bereft of possible bias was more important in my opinion. The journalist's interest was different than ours." She asserts that the lone reporter who attended had been invited by "a select group." She then referenced news articles she had appended to her submission purporting to support her view that the media skewed/slanted coverage of the SCTC issue against the sentiments of the community. She stated that the media coverage demonstrated

---

<sup>7</sup> There was a considerable amount of additional material provided which I have not summarized as in my view, it was not relevant to either Complaint before me.

no “empathy for the concerns, fear or anger voiced by the residents at the meeting who feel they were ambushed, threatened, stabbed” and that the attendees at the meeting were wrongly portrayed as “an uncouth bunch incapable of generosity, empathy or goodwill.” She further stated “Hence the need to limit media access. Could not take that chance. This [was] the theme throughout the meeting – to protect the neighbourhood hence no media. I had given my word to the attendees that there would not be any media and I intended to keep it” [emphasis in her original text];

- Telling Attendees Not to Record the Meeting: She announced at the outset of the meeting that Mr. Charbonneau would be recording it so it could be provided to City people “from the Mayor to Ed [Archer]” but Mr. Charbonneau added that if anyone did not want to be recorded, the recording would be paused. She requested but did not demand that no-one else video or audio record the meeting in order to protect the neighbourhood residents and businesses from not only the standpoint of “negative [economic?] impact” but also “fear of reprisal.”
- Control of Decorum at the Meeting: Cllr. Landry-Altmann stated what she says at the 3:37 mark of the audio recording, being “there will be no questions, no berating, no arrogance or ignorance or you will be asked to leave,” a message she asserts was repeated a few times during the meeting. She further indicated that she interrupted a speaker who was “ranting” at one point and used hand motions and head shakes to express disapproval of what was being said by a deaf person who spoke [it is not clear if these two described admonitions relate to the same speaker];
- Denying the SCTC Director the Opportunity to Speak at the Meeting – She states that Ms. Morin “and her group” were given the opportunity to speak toward the end of the ~2.5 hour meeting, starting at about the 1:49:00 mark and continuing until approximately the 2:24:00 mark. Although at one point she states she alternated between “5 residents/5 business owners in order of sign-in” and that “I did not decide who was going to speak, the sign-in sheet did,” she later states that she deferred Ms. Morin until “all the business owners who had taken time from their businesses that day to speak – that is how concerned they were – [and] after everyone [else] spoke including residents who had not signed in.” She notes that they could have ended the meeting without allowing supporters of the SCTC to speak but they did not. She expressed her view that the SCTC supporters “showed up as a group intent on hijacking the meeting and interjecting whenever they could.”

### **Concluding Statement**

[25] Cllr. Landry-Altmann is confident that she did her job as the Ward 12 councillor in bringing forward issues that affect the well-being of her community. She concludes that she and the SCTC supporters who came to the Meeting share a common role in that they are all advocates – they for the vulnerable community to whom they provide services and she for the “vulnerable” Flour Mill residents and businesses who she has represented since 2006. She feels she demonstrated integrity by keeping her word to residents and business owners to keep the media out to provide a safe and confidential environment. She asserts that the Second Complaint “is not a serious exercise but rather a vexatious attempt at impugning the reputation of the residents [of the Flour Mill



community], the Flour Mill CAN and businesses of the Flour Mill and its Council representative through inaccurate journalism and this diatribe of skewed information to inform the process to suit their purposes.” “I assessed the gravity of the situation and I did my job to maintain the integrity of the meeting and citizen requests.”

### **Letters of Support for Cllr. Landry-Altmann**

[26] I received a number of emails expressing support for Cllr. Landry-Altmann in relation to the subject-matter of the Complaints from Flour Mill business operators and residents, which are summarized as follows on a confidential basis:

- **Manager of Business in Close Proximity to the SCTC** – the gentleman attested to the dramatic disruption of business caused by the clients of the SCTC due to an enormous amount of crime, open air drug use, daily instances of trespassing, theft from stores and vehicles, threats to staff and our customers, weapons being recovered on our property and much more. He spoke briefly at the Meeting and had expressed his concern to the Councillor that media not be present as it might adversely affect willingness of his customers to visit his store if there was negative publicity about the level of crime in the area. He stated that the “outbursts from supporters [of SCTC?] trying to derail the meeting and have a chance to speak were challenging to hear.”
- **Two Flour Mill Residents (Couple)** – “The Flour Mill issues discussed at the CAN meeting in question are very serious and are having a negative impact on the quality of life of residents of that area. Emotions were clearly running high. I can assure you that Joscelyne did what was necessary to keep the meeting orderly and under control.”
- **Female Resident of the Flour Mill District** – “At the outset of the meeting it was evident that the goal of the meeting was for the businesses and the residents of the Flour Mill area to have their opportunity to have their voices heard about the impacts of the SCTC at King/Notre Dame upon them and their lives - to be afforded that opportunity without it being posted or publicized on FB or other media. And this approach was what allowed the community members to speak freely, for us to go to the front of the room and address the meeting. Our councillor’s request asking the media to leave our meeting empowered us to have the strength to do so without fear. I am confident that had she not done so, and had she not taken over chairing the meeting (when it became evident that our CAN Chair could not impartially do so), very few citizens would have come forward. Ms. Landry-Altmann afforded everyone attending the meeting the opportunity to speak. And when I say afforded everyone, I am including the group from the SCTC who attending the meeting. Even though our councillor told them at the outset that they would be given the opportunity to speak, they continuously attempted to interject or interfere with the conduct of the meeting. Their demeanour was confrontational and offensive, and, in my opinion, was

intended to be intimidating to vulnerable or elderly members of our community in attendance.

..what this SCTC location has done to our community members is a tragedy and a travesty. If you listen to the entire recordings of the meeting, you will hear elderly, young, professional, etc., openly crying or telling stories of the fright of even sitting on their porch! Our Councillor fulfilled her role as our elected representative and did her due diligence to her constituents and should be commended for filling a meeting to full capacity for all to be heard!"

The resident also included an email she sent to Cllr. Landry-Altmann on April 25, 2024, the gist of which was captured by the following passage: "I found [attending the April 8<sup>th</sup> Flour Mill CAN meeting] was almost like suffering from PTSD after hearing from so many members of our Flour Mill community. To witness grown men and women, citizens and businesses, elderly people and single parents, openly weep and put forth their fears (of even going outside to sit on their porch!) since the SCTC opened its doors, and more so with expanded hours at the SCTC, affected me greatly."

- **Flour Mill Business Owner** – "The purpose of the [April 8<sup>th</sup> meeting] was to give vulnerable residents (including many seniors) a chance to voice their experiences and concerns in a safe space. Local business owners were also offered an opportunity to share.

Both business owners and residents were told that there would be no media present in order to foster a safe environment of sharing. In fact, as the evening played out, it still took time for many "shy " residents to feel comfortable enough to share their experiences and ideas. I am certain that a media presence would have curtailed much of the conversation.

Business owners were invited to this meeting due to their high interest in the negative impacts of the 'warming centre' on the business area. At our earlier April BIA meeting, we had so many requests for opportunity to comment that we ran out of time. I believe the idea for an additional meeting came from this need.

As an aside, it is my opinion and recollection that this 'highly charged' meeting was well-handled under the circumstances. Most, if not all of the conflict seemed to originate from the complainants."

- **Business Owner on Notre Dame near the SCTC** – the email sent by this individual was very long and somewhat repetitive so I will not set it out in full. It contained a lot of content addressing the problems the SCTC and its clients were creating in the area. The gist of it with respect to the April 8<sup>th</sup> meeting was that the Director of SCTC and her "assistant" constantly interrupted other speakers attempting to interject comments. He felt that her actions were disrespectful of other speakers, disruptive and belligerent, and

that she “tried to take over the meeting” without any regard for the local business and residents’ concerns. He felt that Cllr. Landry-Altman “conducted herself professionally and with transparency and had allowed the gentlemen there [presumably Mr. Charbonneau] to actually conduct the meeting. I did hear her ask the media lady to leave, but did explain to everyone that their privacy may be compromised and that media was not invited in the building because many of the locals didn’t want media there. I don’t think she cared about outside media.” He did concede that “I think she [the SCTC Director] felt that everyone was taking a direct hit on her and she needed to defend herself. But did it the wrong way.” He further conceded that no-one at the meeting was prepared to consider the SCTC Director’s position in light of all they had been through.

- **Young Professional Couple Residing in Flour Mill Area** - The CAN meeting on April 8th was an opportunity for residents to gather and express their concerns, and share their experiences - a meeting that left us feeling connected to other members of our neighbourhood and not alone in our feelings of despair about the state of our community.

Councillor Landry-Altman did a great job at the meeting of making it feel like a safe space to share our concerns with fellow members of the community, and open people’s eyes into the daily struggles we face living there, and dealing with the type of people that we do on a daily basis. Councilor Landry-Altman made it clear that this would not be recorded so that we would not face fear of being portrayed negatively in the news or online based on our experiences - which could have had a negative impact on our careers, or on the businesses in the area who had a turn to speak as well. Had I not felt like this was a safe environment I would have hesitated to share my experiences in this forum. I was greatly appreciative of Councillor Landry-Altman respecting our privacy, and helping us feel like we had a voice pertaining to issues that we have been facing.

The meeting itself was well organized and run. Councillor Landry-Altman gave business' the opportunity to speak, followed by residents and then gave representatives from the SCTC an opportunity to speak at the end of the meeting - this was the established order of speakers before the meeting, and it made sense to let the people who are facing the consequences of the meeting the opportunity to share their concerns prior to hearing from the representatives from the centre - keep in mind the entire time they knew that they would get their opportunity to speak.

While residents were sharing their concerns, there were multiple occasions in which Ms. Jehna Morin and company from the SCTC would attempt to hijack the conversation from residents and business, scoff at their concerns, and downplay the issues that these people have been facing, in which Councillor

Landry-Altmann would politely remind her to allow individuals to speak, and that she would have her opportunity to speak at the end. It was important to us that they spoke at the end as this meeting was not intended to be a debate about the centre, rather just people affected by negative behaviours the opportunity to share their concerns.

Councillor Landry-Altmann was also fair, there was a point in the meeting in which a resident did use rude remarks when referring to the clients of the SCTC, in which Councillor Landry-Altmann spoke up and reminded the resident that there should not be any lude remarks made and that we must keep the meeting respectful.

- **Email from Claude Charbonneau dated June 28, 2024** – In addition to the emails I exchanged with Mr. Charbonneau with respect to questions I had, he sent me an unsolicited email on June 28<sup>th</sup> which I took to be a letter of support of the Councillor, the content of which was as follows:

In our community in the Flour Mill, many of the residents don't have vehicles. We need to support all our businesses in our area and we are very fortunate to have a Councillor like Joscelyne Landry-Altmann that is there to support our community, residents and businesses. The area has improved significantly over the years because of her involvement.

In the last ten years, at many of our CAN meetings, to better understand the homeless and addiction crisis, we have had many discussions and have had several different agencies to find help for them and support them.

In the last year we have experienced our area changing. Since February of this year we have had an increase of the homeless because of the extended hours at the warming shelter at 495 Notre-Dame Avenue in the Flour Mill. It doesn't seem they are solving the problem but they are extending the area from downtown to the Flour Mill and Donovan. It looks like they don't want them downtown. Most businesses downtown close around 5pm. In our area, many businesses close a lot later and we have a residential area. We have six schools. Many students walk to school and the bus route goes through that major intersection.

Having all kinds of individuals right near the sidewalk using drugs, kids learn by what they see. Prior to choosing that location, they should have taken the time to discuss with people in the Flour Mill. If the businesses are not successful, that will impact the residents of the Flour Mill.

With only one individual from the media showing up at our meeting on April 8, who wasn't invited by us, makes it that there's only issues seen in one viewpoint and it doesn't explain well for both sides. Many residents don't go downtown because they don't feel safe. We don't hear all the issues that are

going on through the media. The media should contact the businesses directly. It's up to the businesses if they want to speak to the media.

This meeting was voice recorded so that other city staff or the Mayor would be able to understand through our eyes what we are dealing with.

### **Reply of Second Complainants**

[27] I forwarded Cllr. Landry-Altmann's Complaint and certain exhibits thereto to the 4 proponents of the Second Complaint.<sup>8</sup> Their reply is summarized as follows:<sup>9</sup>

- We attended this CAN meeting not with the intent to “hijack it” as Councillor Landry-Altmann accuses, but to brainstorm and discuss other possible solutions with those being affected by the issues. That being said, Police who were present stated very clearly that they were unaware of the incidents described because there were no calls for service for Police response. These issues were not substantiated by Police crime statistics nor was there any opportunity to determine the validity of the claims and whether or not these incidents were directly related to the SCTC clients. As there was not an opportunity to question, or even have meaningful dialogue about any of the issues brought forward by the residents, these considerations were not possible;
- We do not challenge that there have been issues of disruption to Flour Mill residents. What we do challenge is the use of those complaints to provoke, incite and foment hate against an already marginalized and under-serviced population of people who we work to support with dignity. It is our position, that Councilor Landry-Altmann on her own, and through the leadership of CAN Chair Claude Charbonneau, used the CAN and Councilor position to host a meeting that did not allow for inclusion and two-way conversations and open dialogues that engage citizens in public debate and mutual education. And, that her neglectful behaviour to engage all citizens in an inclusive and democratic problem solving process to mutually address concerns and work collaboratively to find solutions did not reflect the expectations of conduct outlined in the Code of Conduct of an elected official;
- Councilor Landry-Altmann also mentions her insistence on decorum and respectful behaviour throughout the meeting, however, as noted in the transcript, and by many in attendance, several terrible statements were made referring to members of our community that use drugs, including calling them “rats”, shouts to “burn it down”, and on one particularly threatening occasion, a call to harass the centre with horn blasts, a civil disobedience action that

---

<sup>8</sup> I did not send it to the proponent of the first Complainant as I understand she was not present at the Meeting and I was seeking insight into what those in attendance at the Meeting experienced that might not be captured by the audiotape.

<sup>9</sup> I have only selectively summarized the content of the Reply as most of the other points were covered in their original Complaint.

was implemented by some in attendance in the weeks after the meeting. At no time, were these individuals asked to leave the meeting. While Councilor Landry-Altman claims to have given individuals looks of disapproval in her response, looks are not equivalent to a verbal reprimand. It is our position that this type of behaviour was inevitable given the theme of the meeting. While Councillor Landry Altman is insulted by this complaint, it is equally insulting that she would imply our intentions for submitting this complaint would be anything other than a true belief that she breached the Code of Conduct;

- Councilor Landry-Altman admits in her written submission: “ . . . Ms. Morin spoke about 2 hours into the meeting...” What Councilor Landry-Altman failed to share with you is that many people left the meeting prior to Ms. Morin speaking and many left while she was approaching the podium to speak. Likely two-thirds of participants had left using the front and back door of the hall. This included the 2 Police officers that were there and had to leave due to their schedule. This sent a clear message that collaborative solutions would not be discussed with the people who could help.

## **Investigation**

### **What are CANs?**

[28] On June 10, 2001, City Council unanimously adopted a recommendation of the Mayor’s Task Force on Community Involvement and Volunteerism to create Community Action Networks.

[29] Community Action Networks were created with the intention of facilitating community involvement in the planning, budgeting and implementation of community initiatives by providing a line of communication between the community and the City. The idea was that CANs would facilitate the collaborative efforts of citizens who care about where they live and want to make their neighbourhoods the best they can possibly be. CANs are intended to bring citizens together to build strong, engaged communities, foster civic engagement and encourage public participation in local and municipal projects.

[30] There are currently approximately 20 CANs across the City. They each receive some funding from the City through the City’s Community Grants Program. The manner in which CANs operate varies significantly from one CAN to the next, with each CAN being unique to the area that it represents; however, in order to qualify for City funding and insurance protection offered by the City, each CAN is required to adhere to the City-created “CAN Terms of Engagement” and “CAN Standard Operating Procedures.”

[31] Two principles set out in the CANs Terms of Engagement are that they be “open and inclusive to all” and “open and transparent to the public.” The latter principle is set out under the heading “CAN Eligibility Requirements.”

[32] Furthermore, the Terms of Engagement contains the following statement of principle:

### *Strategic Framework*

The City of Greater Sudbury has adopted the International Association for Public Participation's Public Participation Framework, which is an international standard to promote public participation in relation to individuals, government, institutions, and other entities that affect the public interest. ...It aims to strengthen governance by promoting greater transparency, accountability and public engagement. This means that the City will engage in two-way conversations and open dialogues that engage citizens in public debate and decision-making on the development and delivery of municipal programs, services and policies.

[33] The Terms of Engagement expressly contemplates the involvement of the City councillor of the ward in which the CAN operates, as follows:

*The City Councillor is responsible for:*

- Assisting with CAN inquiries regarding City services, facilities and programs where appropriate.
- Attending CAN meetings when available.
- Liaising with the CAN Chair.

### **What is the Sudbury Centre for Transitional Care?**

[34] My office conducted an internet search regarding the nature and purpose of the SCTC.

[35] The SCTC is located at 495 Notre Dame Ave. Its Founder and Executive Director is Jehnna Morin, an experienced addictions counsellor who has spent many years working with vulnerable and at-risk populations. It runs a drop-in centre as well as transitional housing in the Flour Mill district. Its staff serve as a liaison between tenants and the landlords of 14 apartments at 495 Notre Dame and another 18 apartments at 519 Notre Dame. It assists clients with income supplements, social services and teaching tenants how to maintain their housing.<sup>10</sup>

[36] According to the Centre's website,<sup>11</sup>

SCTC offers an intersectional approach that is adapted for each individual and subsequently their unique case of presenting issues. We get to know you - your strengths, challenges, history, and current needs - and we to know your values and beliefs in order to design a personal wellness plan accordingly.

---

<sup>10</sup> "Flour Mill drop-in centre has neighbours concerned, fearful," April 13, 2024, Sudbury.com (Jenny Lamothe); "New grassroots group in Sudbury to provide transitional care for homeless, at-risk population," August 10, 2021, CBC News (Ezra Belotte-Cousineau).

<sup>11</sup> <https://www.sudburyctc.com/services>.

SCTC is determined to ensure the collaborations and partnerships directly align with the mission of its program and service delivery in accordance with both professional guidelines and individualized wellness plans. These programs can include but are not limited to:

- 1 Peer Support
- 2 Housing Supports
- 3 Field Outreach & Navigation Intake
- 4 Psychological Supports & Referrals
- 5 Advocacy Program & Confidentiality
- 6 Substance Abuse Relief Programs & Referrals
- 7 Employment & Life Skills Development

### **Audio and Video Recordings Obtained from Sudbury.com**

[37] I requested the videos reviewed by Ms. Lamothe from Sudbury.com. After initially expressing confidentiality concerns, the outlet secured permission from the persons who had supplied the videos of the meeting to release them to me and they were eventually provided to me. It turns out that there was one lengthy audio (only) recording covering a good portion of the meeting and a series of videos each capturing small portions of the meeting. In general the sound quality of all recordings is not great and the cameras on which the videos were recorded were mostly hidden from view under clothing such that they did not capture anything.

[38] A review of the audio and video recordings by my office indicates the following:

- None of the recordings capture Ms. Lamothe being asked to leave, however, a video recording does capture Cllr. Landry-Altman stating: “We don’t need the slant of some media person who wasn’t invited.”
- The Councillor does not forbid attendees from recording the meeting but discourages it on more than one occasion and someone in the crowd suggests it would be illegal to tape another person without their consent;
- Ms. Morin of the SCTC is repeatedly told she could speak, only to have the invitation reneged upon and put off until later in the meeting by Councillor Landry-Altman. When Ms. Morin is given the chance to speak, she is repeatedly interrupted, such that her submissions were disjointed. When a resident asks what solutions the SCTC proposes, the Councillor states “we are not doing that tonight,” having previously commented that the intent of the meeting was to hear concerns from residents and businesses, not hear from the SCTC.

### **Email Exchange with Jenny Lamothe, Sudbury.com**

[39] We requested that Ms. Lamothe confirm to us in writing that she was refused entry to the meeting by Councillor Landry-Altman (as opposed to merely being asked to leave voluntarily as



Cllr. Landry-Altman claimed in her Response) and had a blank questionnaire forcibly taken from her hand. She confirmed both of these assertions.

### **Audio Recording of the Meeting from Claude Charbonneau**

[40] I asked Cllr. Landry-Altman if she had an audio recording of the CAN meeting. She advised me that she did not but that Claude Charbonneau, the Flour Mill CAN Chair, did record the meeting, and she provided me with his email address and telephone number. I subsequently contacted Mr. Charbonneau and he eventually provided me with the audio recording.

[41] My office's review of the 2:39:05 long audio recording of the Meeting revealed the following of relevance to my investigation:<sup>12</sup>

#### "Open, Inclusive and Transparent" Meeting

- 00:14 – 01:38<sup>13</sup> - Cllr. Landry-Altman told a journalist she could not to attend the meeting to protect the Flour Mill – “we don't need the slant of a media person who wasn't invited here.”
- 04:08 – 04:30 - Mr. Charbonneau announced that he was recording the meeting so that “the Mayor and Ed [presumably Archer, City CAO]” and others could hear what was happening in the Flour Mill. He added that if anyone did not want to be recorded, please let them know and he would pause the recording. It does not appear that anyone asked to pause the recording at any point during the meeting.
- 04:56 – 05:50 - Cllr. Landry-Altman introduced the following other CGS Councillors in attendance at the Meeting: Cllrs. Fortin, Brabant, Parent and Sizer, who she indicated were there merely to observe, not speak.
- 47:05 – 47:22 - after a resident shared an emotional story, Cllr. Landry-Altman identified this as an example of the kind of story she did not want the media to publish. She then segued to cautioning people who might be recording the meeting.
- 47:22 – 47:32 - Cllr. Landry-Altman told anyone who was recording the meeting to be respectful of the stories being told.
- 1:15:27 - Cllr. Landry-Altman addressed anyone recording the meeting, asking them to consider what would happen to someone's property value if their experiences were posted publicly.

---

<sup>12</sup> Cllr. Landry-Altman very helpfully provided her 25 page handwritten notes of the Meeting as Ex. “P” to her Response, which identified both each speaker and (generally accurately) what was said and by whom, which greatly assisted our review of the recording.

<sup>13</sup> All time stamps are in reference to the audiotape provided by Mr. Charbonneau.

### Stated Purpose of the Meeting

- Both Cllr. Landry-Altman and Mr. Charbonneau say it was a meeting to get residents and businesses to explain what they have been experiencing.
  - 53:20 - Cllr. Landry-Altman explained that the purpose of the meeting was not to offer solutions – “we are not here to talk about that tonight.”
  - 2:12:07 - when the SCTC staff were speaking, Cllr. Landry-Altman stated that the purpose of the meeting was not to educate.
  - 2:14:30 - Cllr. Landry-Altman stopped a discussion about solutions, saying that was not where they were going and “the focus of the meeting was to hear what people had to say.”
  - 2:16:02 - in an aside to the speaker and with a significant amount of people talking over each other, Cllr. Landry-Altman told the speaker that ‘the purpose of the meeting was to hear what people had to say’.
  - Mr. Charbonneau then announced that the meeting would be over if people continued to talk over each other. He also said ‘if someone is speaking, let’s give her two minutes to see what she has to say’.

### Offensive Descriptions of SCTC Clientele

- Various speakers used the following language to describe the clientele of the SCTC:
  - 08:02 – “vagrants”;
  - 44:13 – “riffraff”;
  - 54: - “druggie guy”;
  - 58:25 – “derelicts”;
  - 58:24 - “sickos”;
  - 58:56 – “our country”;
  - 1:00:07 – “strung up on something”;
  - 1:04:47 – “zombie time”;
  - 1:21:00 – “that thing at the corner of King Street”;

- 1:23:51 – “they are a bunch of spiders”;
- 1:24:56 – “zombies, but they’re untouchables”;
- 1:27:21 – “cracked out”;
- 1:29:08 – “vagabonds”;
- 1:30:42 – “little gangs”;
- 1:50:36 – “they are rats – if you feed them they come”;
- 1:55:06 – a commenter questions if they even deserve to be fed.

[42] Despite Cllr. Landry-Altmann’s admonition to attendees at the outset of the meeting that “there will be no questions, no berating, no arrogance or ignorance or you will be asked to leave” (3:28-3:45), she issued only one warning concerning inappropriate language in respect of one speaker and no attendee was thrown out for making any such comments.

#### Threats of Harassment of and Violence Against SCTC Clientele

[43] Various speakers used the following language to suggest how the clientele of the SCTC should be dealt with:

- 30:50 – “we’ve even had to go out there with a megaphone and blast a little siren on it just to get people moving on”;
- 1:24:40 – “I gotta wear a crowbar in my friggin’ jacket”;
- 1:25:40 – “every time you drive by start honking your car horns”;
- 1:26:12 – After referencing a previous speaker’s comments regarding the use of a megaphone, a speaker commented “this is a good point, I’m gonna rent one”;
- 1:26:18 – “let’s start pushing back”;
- 1:26:24 – “harass them back”.

[44] The one attendee who made four of the above comments was chastised by Cllr. Landry-Altmann and subsequently apologized to Ms. Morin of the SCTC, which apology was accepted (1:26:46).

Disrespectful Comments about the SCTC's Executive Director and City Staff

[45] Speakers made the following disrespectful comments against the SCTC's Executive Director and City Staff:

- 16:35 - when Ms. Morin called herself a legitimate business owner, Claude Charbonneau called out "Legit, yeah?";
- 17:09 - Claude Charbonneau stated "[Ms. Morin's] pocketing the money";
- 1:24:35 – "no respect for you guys" (directed at Ms. Morin and her staff);
- 1:54:20 - Cllr. Landry-Altman challenges a SCTC landlord about her right to speak on the basis that she is the administrator of a "controversial Facebook page";
- 1:55:06 – someone says to Ms. Morin "stop feeding them drugs";
- 2:00:26 - Cllr. Landry-Altman told Ms. Morin to "skip the drama";<sup>14</sup>
- 2:31:43 - complaint that there was "zero follow through" by City staff and they were "not at all good";

Statements of GSPS Representatives

[46] After introducing themselves at 05:57-06:01, two GSPS officers in attendance provided the following instructions (1:08:43 – 1:12:05) on how to deal with incidents:

- Call whenever you feel uncomfortable;
- Call at any point, at any time;
- Call since you can always cancel the call;
- They can't move people along if there's no criminal activity;
- Residents should also report online after the fact;
- Residents should not put themselves 'in any sort of jeopardy';
- If residents do not feel comfortable, they should get on the phone.

[47] The officers also observed that policing is very statistics-driven, that increased patrols need to be justified by statistics and that their statistics "aren't showing what everyone is talking about but they conceded that "these are [occurrence] statistics." Later in the Meeting (2:32:57), a third GSPS officer who appears to have been in plain clothes<sup>15</sup> stated that people could contact the police using the non-emergency line, and that the police need the calls to generate the statistics in order to increase their staffing. Cllr Landry-Altman stated in her Response that the officers later pulled away from the statement that crime reporting statistics did not substantiate a recent increase in

---

<sup>14</sup> This is ironic given that the business and residents' speeches were for the most part quite emotional.

<sup>15</sup> I make this assumption this because she had to clarify to other attendees that she was in fact a police officer.

crime in the area, and agreed there was an increased crime problem in Flour Mill due to the SCTC's expanded operations, but our review of the audiotape did not bear this out.

Concern that the Homeless Population was Being Shifted from Downtown to the Flour Mill District

[48] The following statements expressed concern that the homeless population was being shifted from the downtown (and perhaps even from elsewhere) to the Flour Mill district:

- 26:06 – “things are moving”;
- 28:36 - taxis are bringing people from downtown into the Flour Mill;
- 58:58 – “don’t bring them in from all over”;
- 1:13:38 – “individuals coming up by cab”;
- 1:29:46 – [they are] sending people to the Flour Mill from out of downtown;
- 2:13:30 - in response to the question/allegation by Cllr. Landry-Altmann that residents were being taxied to the SCTC from downtown, the speaker explained that residents of SCTC were being driven from the building to the Grace Family Church (a four minute drive from the SCTC building and which is not downtown) by staff from the Homeless Network;
- 2:27:23 - someone complained that they had shut down the downtown warming shelter thereby “dislocating” [sic] the homeless population to the Flour Mill.

Dealings with the SCTC Director and SCTC Supporters at the Meeting

[49] The following comments were made by the co-Chairs of the Meeting in respect of the participation of Ms. Morin and SCTC supporters:

- 16:19 - Claude Charbonneau stopped Ms. Morin from speaking as a business (“I told you that you could stay at the back [of the room]”) and said they should hear the residents first;
- 17:14 - Cllr. Landry-Altmann asked Ms. Morin to speak at the end, after all other *businesses* had spoken on the basis that many had to return to work at their businesses afterwards;
- 52:22 – after all the business owners had spoken, Cllr. Landry-Altmann told Ms. Morin to continue waiting while she recounted a story told to her by a business owner who could not attend the meeting;

- 53:20 - Cllr. Landry-Altmann prevented her from responding to another speaker, saying she could only talk about her “business”, not offer solutions;
- 53:47 - Cllr. Landry-Altmann said they would hear from other businesses who could not attend, and then residents;
- 59:47 - when Ms. Morin tried to speak at the end of the other business representatives, Cllr. Landry-Altmann said she had changed her mind and decided Ms. Morin would speak after residents, including any who wished to speak who had not signed in;
- 1:03:18 - when Ms. Morin pointed out that someone who was not a resident of the area was being allowed to interrupt from the floor, Cllr. Landry-Altmann threatened that they would take a 5-minute break if the back and forth continued;
- 1:16:08 - A resident who works for Ms. Morin claimed that Cllr. Landry-Altmann should not be running a public [CAN] meeting and was told by Cllr. Landry-Altmann to sit down;
- 1:27:30 - Cllr. Landry-Altmann prevented Ms. Morin from responding to a speaker;
- 1:31:47 - Cllr. Landry-Altmann prevented Ms. Morin from responding to a speaker;
- 1:48:55 - Cllr. Landry-Altmann said that they could not talk about solutions until the list was finished;
- 1:53:49 - Cllr. Landry-Altmann stopped a resident of Sober Living and a landlord working for SCTC from standing together at the microphone to speak, asking them to go one at a time (although she had previously allowed a husband and wife to do so);
- 2:03:14 - Ms. Morin was allowed to speak (not at 1:49 into the Meeting as Cllr. Landry-Altmann stated in her Response);
- 2:11:37 - Cllr. Landry-Altmann interrupted a speaker from SCTC asking her how long she was going to be;
- 2:12:07 – While a SCTC staff person was speaking, Cllr. Landry-Altmann interrupted and stated that the purpose of the meeting was not to educate;
- 2:13:15 Cllr. Landry-Altmann claimed that the SCTC speaker was “discounting” what others have said occurred and after asking the speaker if

residents were being taxed to the SCTC and receiving a negative answer, she accused the speaker of lying;

- 2:14:02 - Cllr. Landry-Altmann stopped a speaker who was not a resident who wanted “to speak to us about social justice which is another point” until Cllr. Sizer expressed support for her speaking;
- 2:14:30 - Cllr. Landry-Altmann stopped a discussion of solutions, prompting a resident to ask Cllr. Landry-Altmann why are we not letting people offer solutions;
- 2:20:45 - Cllr. Landry-Altmann asked if the current speaker (a SCTC supporter) was going to “wrap it up”.

### Disruptive Behaviour

[50] Both the Second Complainants and the Respondent and her supporters accused the others of engaging in disruptive behavior, in the case of the Second Complainants, when members of the business community and residents were speaking, and in the case of the Respondent and non-SCTC supporters, when the SCTC supporters were speaking.

[51] Our review of the audiotape does not bear out the interjections by the SCTC supporters as alleged. It is possible this was because they were relatively quiet or far away from the microphone and as such were not picked up by the recorder. On the other hand, there was a generally loud din in the room while the SCTC supporters were speaking (as if there were a lot of conversations going on amongst the audience or perhaps comments being directed at the speaker) which was loud enough to make it difficult to always hear the speaker with the floor. Cllr. Landry-Altmann, in particular, repeatedly interrupted the pro-SCTC speakers, such as to ask for or confirm details about the capacity of the SCTC buildings, funding, how much they paid in rent, and even whether the speakers were Flour Mill residents, interruptions that did not happen when other business representatives and residents were speaking.

[52] Our impression is that the Meeting took on a combative atmosphere when the SCTC supporters were speaking which was far from true when others at the Meeting spoke.

### **Email Exchange with Claude Charbonneau**

[53] By email sent on June 21<sup>st</sup>, I asked Mr. Charbonneau how Flour Mills CANs public or “engagement” meetings are typically publicized and how it was done in relation to the April 8<sup>th</sup> meeting. By email sent to me on June 27<sup>th</sup>, he advised as follows:

For this meeting on April 8th, we only had about 25 residents who gave us their emails for contacts from prior meetings, we have 6 residents who gave us their phone numbers to contact them. Also, the city allows us to print 50 copies of our agenda at the library for free. We did an extra 50 copies and our Councillor provided us with 100 copies. We had two volunteers and myself to distribute them. The Councillor and I visited most businesses

in the area prior to the meeting to see what their issues were. At that time, they were advised about the meeting.

In the past we have used the post office ... to mail out the agenda in the Flour Mill area which is very expensive. At different times at four different meetings over the years we hired students and printed the agenda at a print shop and paid for them. We paid the students to deliver in every home in the Flour Mill area.

We have 20 to 30 residents who attend our meetings regularly. Most of the time when people have issues, that's when they show up at our meetings.

## **Relevant Legislation and Council Policies and Procedures**

### **COC**

[54] The relevant provisions of the Code are as follows:<sup>16</sup>

#### Definitions

1. (1) "Local Board" means a local board as defined in sections 1 (1) and 223.1 of the Municipal Act, 2001 and without limitation includes the Board of Management for any Business Improvement Area, the Committee of Adjustment, Fence Viewers appointed under the Line Fences Act, Livestock Valuers appointed under the Protection of Livestock and Poultry from Dogs Act but is not intended to include any advisory panel created by Council from time to time;

#### Conduct in Office, Including at Council and Committees

12.(1) Every Member shall conduct themselves with decorum in the course of their performance, or required performance, of their responsibilities as a Member, and at meetings of Council, Committees of Council or meetings of the Local Board as the case may be, and other meetings, and in the case of Members of Council, in accordance with the provisions of the City's Procedure By-law, and other By-laws of the City, where applicable.

#### Discreditable Conduct

15.(1) Every Member shall:

---

<sup>16</sup> The Second Complaint sets out a number of sections of the COC alleged to have been violated. To the extent that I have not included these sections in this paragraph, it means I have determined that those sections clearly have no application. In terms of Section 4, General Principles, in keeping with previous findings I have made as IC in other jurisdictions (see, eg., Private Complaint re: Councillor Danko Tweet (Re) – DGB-HamiltonICI-2024-01, paras. [11]-[15]), statements of general principle do not set out independently enforceable obligations, although they can be relevant to the interpretation of other sections of the Code that do set out enforceable obligations.



(a) treat other Members, City officers and employees, and members of the public, appropriately, and without abuse, intimidation, harassment or violence; and

(b) make all reasonable efforts to ensure that their work environment is free from discrimination, harassment and violence. 15.(1) Every Member shall:

#### Compliance with Policies and Procedures

18.(1) Every Member shall adhere to such by-laws, policies and procedures adopted by Council or the Local Board as the case may be, that are applicable to them, whether or not specifically identified herein.

### **Community Action Network Terms of Engagement**

[55] The CAN Terms of Engagement was presented to the Council Priorities Committee on June 18, 2008 (report date - June 6/08) and was ratified by City Council on June 25, 2008 (#CC 2008-239).

[56] Provisions of the Terms of relevance to the Complaint are as follows:

- p. 2 - CANs are open and inclusive to all.
- p. 4 – CANs are open and transparent to the public.
- p. 5 - CANs are required to provide a safe and welcoming atmosphere for citizens to come together.
- p. 5 – CANs must operate in accordance with the CAN Standard Operating Procedures.

#### **CAN Standard Operating Procedures (“CAN SOP”)**

[57] Article 4 (Meetings) of the CAN SOP states that CANs may use various communication methods to advertise meetings (aka - community engagement opportunities) *to ensure inclusivity*, including email, social media, website, Canada Post, flyers, and personal contact with members [emphasis added].

### **Findings**

#### **Preliminary Issue: Have the Second Complainants Brought Their Complaint in Their Personal Capacity or on Behalf of Their Organizations?**

[58] By email dated July 5<sup>th</sup>, Cllr. Landry-Altman raised a concern about whether the four Second Complainants were bringing the Complaint in their personal capacity or as representatives

of their respective organizations/boards of directors, in light of s. 21.(1)(b) of the COC, which states as follows:

21.(1) A Complaint that a Member has contravened the Code of Conduct or a corporate policy of the City governing ethical behaviour may be initiated by any person, any Member of Council, or by Council as follows:

...

(b) a Complaint must be signed and dated by the Complainant who shall be an identifiable individual (Complaints may not be submitted by any group, organization or corporation).

[59] The Complaint was dated. It was not signed but we have long adopted a practical approach that emailed Complaints do not have to contain a handwritten signature as long as the email address is verifiable. I confirmed with each of the Second Complainants that they were bringing the Complaint in their respective personal capacities, not on behalf of their organizations or boards of directors. I therefore find that the Second Complaint is properly constituted.

**Are CANs “Local Boards” for the purpose of the Code of Conduct for Members of Council and Local Boards?**

[60] The definition of “Local Board” in the COC expressly excludes “...any advisory panel created by Council from time to time.” Although “advisory panel” is not defined in the COC, it is defined in CGS Procedural Bylaw 2019-50, Article 1, as follows:

“Advisory Panel” means a body established by Council... composed mainly of stakeholders and citizens, the purpose of which is advisory or consultative in nature, and includes round tables, working groups and any other Council appointed body, the majority of whose membership consists of individuals who are not Members of Council.

[61] City Bylaw 2023-04 being a Bylaw Establishing Committees of Council and Advisory Panels lists all Advisory Panels established by Council. CANs are not included in the list of Advisory Panels in that Bylaw (they are also not listed as a Committee of Council in that Bylaw). They therefore do fall within the express exception to the application of the COC set out in section 1(l) of the COC.

[62] “Local Board” is defined in section 1(1) of the *Municipal Act, 2001* as follows:

“local board” means a municipal service board, transportation commission, public library board, board of health, police service board, planning board, or any other board, commission, committee, body or local authority established or exercising any power under any Act with respect to the affairs or purposes of one or more municipalities, excluding a school board and a conservation authority;

[63] Under s. 223.1(1) of the *Municipal Act, 2001*, the definition of “local board” is narrowed somewhat in identifying certain named entities that are not to be considered “local boards” for the

purpose of application of Codes of Conduct and the mandate of Integrity Commissioners. None of the entities listed in that section encompass CANs.

[64] Where an entity is not one of those expressly identified in the definition of “local board” in section 1(1) of the *Municipal Act, 2001*, they must be found to have been “established or exercising any power under any Act with respect to the affairs or purposes of one or more municipalities.” CANs are not established under any Act and do not exercise any power conferred under any Act.<sup>17</sup> I therefore find that CANs are not “local boards” as defined in the COC as they do not meet the definition of “local board” in the *Municipal Act, 2001*.

[65] In case I am wrong with respect to the interpretation of the definition of “local board” in the *Municipal Act, 2001*, I will analyze the nature, composition, operation and mandate of CANs from first principles to determine whether they constitute “local boards” for the purpose of the COC.

[66] In *Goderich (Town of) (Re)*, the Ombudsman for Ontario set out a four-part test to determine whether an entity is a “local board”:

1. The entity must be carrying on the “affairs of the municipality”;
2. There is a direct link between the entity and the municipality (either by way of legislation or authority from the municipality);
3. There must be a connection to or control by the municipality; and
4. There must be an element of autonomy.

1. Affairs of the Municipality

[67] According to the *Goderich* decision, this has generally been defined in the negative. The following factors generally indicate that the board is not carrying on municipality affairs:

- the body has an object of carrying on operations for a private, rather than a public municipal purpose (for example, the benefit of its shareholders);
- the body is independent;
- the body is created by another level of government;

---

<sup>17</sup> I am satisfied that CANs are not “community councils” as defined in s. 23.6(1) of the *Municipal Act, 2001* as they are not identified as such in either the CAN Terms of Engagement or the CAN SOP and they do not exercise “any powers and duties that have been delegated... by the municipality with respect to matters relating to all or part of the municipality” as is required in order to meet the definition of a “community council” under s. 23.6(1) of the *Municipal Act, 2001*.

- the body is not responsible to the municipality; and
- the body requires the approval of another entity before acting.

[68] Although CANs are eligible for funding from the City, and must report to the City on its activities as a condition of receiving such funding, they are otherwise completely independent from Council and do not otherwise report to or take direction from the City or Council. Council does not appoint any members of CANs. I therefore find that CANs fail the “Affairs of the Municipality” test.

## 2. Direct Link

[69] Article 14 of the CAN SOP states that “the CAN will provide consolidated feedback received from the community to the CGS through the CGS Staff Liaison.” I find based on this mandate that there is a direct link between the City and CANs.

## 3. Connection to the Municipality

[70] Other than requiring an annual report as a condition to receiving an operating grant from the City, the City and its Council exercises no control over CANs and has no power to direct CANs regarding what activities it will engage in. Although there is a City staff liaison with CANs and the area councillor is responsible for liaising with the CAN chair and attend meetings when available, neither the liaison nor the councillor have any authority to direct the operations of the CAN. I therefore find that there is insufficient connection or control between the City and CANs to meet this requirement.

## 4. Autonomy

[71] CANs are generally fully autonomous from the City and its Council in that the CANs set their own agendas and there is no provision for the City to direct their activities. I therefore find that CANs meet the autonomy test for recognition as a local board.

## Conclusion Regarding Whether CANs Qualify as Local Boards

[72] Based on the definition of “local board” in the COC, its definition in the *Municipal Act, 2001* which is incorporated into the definition of “local board” in the COC, my review of the history of the establishment of CANs by Council, their Terms of Engagement and Standard Operating Procedures, and application of the test for whether an entity is a “local board” under the *Goderich* test established by the Ontario Ombudsman’s office (two of the four criteria for which are not met by CANs), I find that CANs are not “local boards” for the purpose of application of the COC.

[73] I therefore find that I have no jurisdiction to investigate the conduct of Mr. Charbonneau as Chair of the Flour Mill CAN leading up to and at the April 8<sup>th</sup> meeting.

### **What was the “True Nature” of the April 8<sup>th</sup> Meeting?**

[74] Cllr. Landry-Altman sought to characterize the Meeting both in terms of the title of her Response and in the body of her submissions as a “Joint Flour Mill BIA/Community Consultation/Flour Mill CAN Meeting.” The flyer advertising the Meeting was titled “Flour Mill Community Action Network (C.A.N.) and Joscelyne Landry-Altman, Deputy Mayor, Councillor Ward 12 Invite you to a Community Meeting.” It is clear from the audiotape that the only persons “running” the meeting were the Councillor and Mr. Charbonneau. There was no representative of the BIA introduced as a co-Chair or co-organizer of the meeting, or at all.

[75] I find that while those personally solicited to attend the meeting were predominantly area business persons who may well have been members of the BIA, there is no other, contemporaneous indication that this was a BIA event, and that the actual nature of the meeting was a joint Flour Mill CAN/Cllr Landry-Altman Community Meeting. I also note that most of the individuals who wrote letters of support referred to the meeting as a CAN meeting.

[76] Given that it was a CAN Meeting, at least jointly, I find that the principles and procedures applicable to CAN meetings were required to be followed. I also find that as the meeting was presented as a community meeting with Cllr. Landry-Altman and as she chaired, or at least co-chaired, the Meeting, her obligations under the Code of Conduct were required to be respected.

### **Did Councillor Landry-Altman Breach the COC?**

#### General Findings

[77] My findings with respect to the Meeting relative to the allegations in the two Complaints are as follows:

- The purpose of the meeting from Cllr. Landry-Altman’s standpoint, largely by her own admission, was to create a compelling and passionate record of local business and resident complaints to present to the Mayor, fellow councillors and the CAO to support her position that the SCTC should be moved out of the Flour Mill neighbourhood, or at least, that the City discontinue funding the SCTC. When someone at the meeting asked Ms. Morin, the SCTC Director, what solutions the SCTC proposed to address the problems being expressed, the Councillor immediately interjected “we are not doing that tonight,” having previously commented that the intent of the meeting was to hear concerns from residents and businesses, not hear from the SCTC. She made several additional comments throughout the Meeting along the same lines. This is consistent with her “all or nothing” view that the Centre must go, as opposed to looking for, or even considering, other, less drastic solutions to the problems;
- The invitees to the Meeting were effectively handpicked by Cllr. Landry-Altman by means of primarily hand-delivered invitations and select outreach (eg. a neighbourhood church and the limited CAN email list) rather than following the usual practice of mailing out notices of Flour Mill CAN meetings to all Ward 12 residents and the requirement of use of multiple modes of communication “to ensure

inclusivity” as directed by the CAN SOP. I find that she did this in order to maximize the attendance of people who shared her view that the Centre must go, and minimize the attendance of those sympathetic to the goals of the SCTC and the plight of the homeless population, or who at least wanted to consider less drastic solutions. The only possible excuse for this - that the meeting was called on short notice such that it was not possible to more widely publicize the meeting – is unconvincing given that there was no valid reason the Meeting could not have been delayed by another week to permit a wider circulation of invitations;

- The characterization of the meeting as a “Community” and “CAN” meeting created the false perception that it was an open, democratic meeting that was widely advertised to all those within the Flour Mill community where people with all views could express themselves, when the reality was very different, in that the meeting was “stacked” with people with a viewpoint the Councillor wanted to be heard. I find that the Councillor consciously decided to bring the meeting under the CAN rubric rather than the feedback being just a collection of complaints from random Flour Mill businesses and residents in order to increase the weight of the message by making it appear that the feedback was coming from a formal body (the Flour Mill CAN) charged with conveying the sentiments of the community to Council;
- Cllr. Landry firmly excluded a member of the press from attending (not merely requested that the reporter leave) because “We don’t need the slant of some media person who wasn’t invited.” I find that she was concerned that the one-sided, anti-homeless “slant” of the Meeting which she doubtlessly knew would materialize would be reported, undermining her efforts to achieve her intended objective of getting the SCTC out of her Ward;
- Despite stating at the outset of the Meeting that “there will be no questions, no berating, no arrogance or ignorance or you will be asked to leave,” she, as Chair, allowed numerous speakers to hurl abuse and insults about the clients of the SCTC and some others to make threats of violence and harassing conduct against them, without, save for two exceptions, any of these speakers being warned or chastised, let alone anyone being “asked to leave” the meeting, I find that in doing so, she effectively condoned such inappropriate and abusive insults and harassment, and disrespect for fellow citizens;
- She told attendees on a number of occasions that they should not be recording the Meeting;
- She not only treated the SCTC Director and supporters with disrespect, indeed, contempt, and also permitted others in attendance to do the same, but she ensured that the SCTC staff and supporters who attended the Meeting were relegated to speak at the very end after many attendees had already left so as to minimize the impact of anything they had to say. The SCTC supporters were also frequently interrupted as they tried to make the case for the SCTC, particularly by the Councillor herself. I find that the audio recording does not bear out the allegation of the Councillor and some of her supporters that the SCTC supporters were rude and disruptive at the meeting.

I am sure that Cllr. Landry-Altmann, Mr. Charbonneau and others were no doubt surprised that the SCTC supporters learned of the meeting and came with such significant numbers but it was advertised as a public CAN meeting and they had as much right to be there, and to be heard, as anyone else, whether that suited the Councillor's agenda or not.

Section 18.(1), COC

*Preliminary Issue: Are the CAN Terms of Engagement a "policy" or "procedure" adopted by Council?*

[78] I find that the CAN Terms of Engagement represent a City policy regulating the conduct of CANs. It was expressly ratified by Council and meeting the requirements set out in the Terms of Engagement are conditions of City funding and insurance eligibility for CANs. I further find that the CAN SOP is incorporated by reference into the Terms of Engagement.

*Breach of s. 18.(1), COC*

[79] A City policy – the CAN Terms of Engagement – requires CANs meetings to be “open and inclusive to all,” “open and transparent to the public,” “provide a safe and welcoming atmosphere for citizens to come together” and, by incorporation by reference, be widely advertised to ensure inclusivity.

[80] As a City councillor, Cllr. Landry-Altmann is deemed to be aware of the requirements of the City's policies regarding CANs as reflected in the Terms of Engagement and the CAN SOP set out above. Rather than spearheading the breach of these requirements, she ought to have been using her position and influence as organizer and Chair of the Meeting to ensure they were adhered to.

[81] I am satisfied from my review of Cllr. Landry-Altmann's own Response, as well as a review of the video and audio recordings of the April 8<sup>th</sup> Flour Mill CAN meeting, that Councillor Landry-Altmann:

- Excluded a member of the press from attending in violation of the “open and transparent” meeting principle. To the extent Cllr. Landry-Altmann gave her word to local business people that no members of the press would be in attendance at the public, CAN meeting out of fear of negative impacts if the dire circumstances in the Flour Mill district as a result of the SCTC's presence came out, she had no right to give that assurance as it violated the requirement in the CANs Terms of Engagement. Furthermore, the meeting *was* reported in the media and I have received no report from the Councillor or her supporters that any dire consequences to the residents and businesses of the Flour Mill CAN have materialized as a result;
- Told attendees they could not record the meeting in violation of the “open and transparent to the public” principle;

- In breach of Article 4 of the CANs SOP, failed to ensure inclusivity of the Meeting by selectively advertising the meeting to maximize the turnout of those who were opposed to the operation of the SCTC in the Flour Mill district and to minimize the attendance of those who may be supportive of the SCTC and interested in a less drastic solution;
- In violation of the requirement of “openness and transparency,” Cllr Landry-Altman set then constantly re-jigged the order of speakers in order to maximize the negative criticism of the SCTC and its clients and relegated the Director of the SCTC, an entity operating within the geographical jurisdiction of the CAN whose facility was the very subject of critical discussion at the meeting, to the end of the meeting after many of the attendees had already left, and then permitted and personally initiated numerous interruptions of the Director’s remarks, such that the ability of the Director and other SCTC supporters to convey her message was significantly impaired. Once again, notwithstanding the Councillor’s personal agenda for the Meeting, as a CAN meeting, it was required to be “open,” transparent” and “inclusive”, meaning that everyone in attendance with a bona fide reason for being there had an equal right to be heard;
- Despite the requirement that CANs “provide a safe and welcoming atmosphere for citizens to come together,” the Meeting could not have been less safe and welcoming for clients of SCTC<sup>18</sup> or those who supported SCTC’s operation given the abusive, intimidating and threatening statements made by speakers at the meeting toward SCTC staff and its clients with the condonement of Cllr. Landry-Altman.

[82] I find that these actions breached the Terms of Engagement and in doing so, Councillor Landry-Altman failed to adhere to “policies and procedures adopted by Council.” I therefore find that she breached s. 18. (1) of the Code of Conduct.

#### Section 15.(1), COC

[83] Section 15.(1) provides that “Discreditable Conduct” is made out where a member fails to “treat...members of the public, appropriately, and without abuse, intimidation, harassment or violence.”

[84] In this case, Cllr. Landry-Altman did not personally make any statements or commit any acts at the Meeting that I regard as “abuse, intimidation, harassment or violence.”<sup>19</sup> Having said

---

<sup>18</sup> How would the reader feel if they were at a meeting where they were being referred to as a member of a group that were “derelicts”, “sickos”, “zombies”, and “spiders”, to name just a few comparable epithets? It goes without saying in this day and age that homelessness is an involuntary condition, not a conscious choice, and addiction is a disease, not a personal choice, let alone that petty name-calling should never be allowed at any municipally-associated meeting.

<sup>19</sup> While one might argue that relegating SCTC supporters to the end of the meeting was not “appropriate”, I decline to make such a finding in this case.



that, she was the Chair of the Meeting. She presided over a meeting where there were not just one or two offensive, abusive remarks made about the SCTC clients and staff but many,<sup>20</sup> along with several threats of serious harassment and violence against clients of the SCTC. As Chair, it was her obligation to maintain and insist upon a level of civility on the part of those in attendance; otherwise, in my view, she effectively condoned such conduct, which I so find. She appeared to acknowledge this requirement of her role when she said at the outset of the Meeting, “there will be no questions, no berating, no arrogance or ignorance or you will be asked to leave.” Notwithstanding this, she permitted speakers to repeatedly make shameful, rude, highly pejorative statements and threats directed at clients of the SCTC, almost entirely without warning, and in no case resulting in the offending party’s removal from the Meeting.<sup>21</sup>

[85] Notwithstanding my personal view that in permitting speakers at the Meeting of which she was Chair to make abusive, intimidating, harassing comments without warning, sanction or removal from the Meeting, she fell below the standard expected of her as a councillor, there is no authority for attributing the statements of speakers to her in her role as Chair and thus finding that she effectively treated members of the public (SCTC clients) inappropriately and with “abuse, intimidation [and] harassment.” I further find that Section 15 of the Code of Conduct, on its plain reading, extends only to direct statements or actions on the part of councillors, not statements or actions that she merely condones.

[86] I therefore find that notwithstanding that she permitted speakers at the Meeting of which she was Chair to make abusive, intimidating, harassing comments without warning, sanction or removal from the Meeting, to the extent of condoning such behavior, she did not breach section 15 of the Code of Conduct.

#### Section 12.(1), COC

[87] Section 12 provides that “Every Member shall conduct themselves with decorum in the course of their performance, or required performance, of their responsibilities as a Member, and at meetings of Council, Committees of Council or meetings of the Local Board as the case may be, *and other meetings*” [emphasis added].

[88] I have elsewhere found that similar provisions of other Codes of Conduct are intended to ensure that councillors’ communications do not fall below the level of acceptable public discourse, and that the term “decorum” for the purpose of such provisions means “socially acceptable, polite behavior that shows respect and good manners.”<sup>22</sup> I have further held that the rule of “decorum” can be breached even where the statements in question are made without the intent to harm or with a commendable motive.<sup>23</sup>

---

<sup>20</sup> See para. [41] above, 13th bullet.

<sup>21</sup> See paras. [41] and [43] of this Report.

<sup>22</sup> Complaint re: Councillor David Sheen – DGB-CaledonICI-2024-02, para. 21.

<sup>23</sup> Ibid, para. 27, citing *McConnell v. Ford*, 2015 ONMIC 4 (CanLII).

[89] As with s. 15 of the COC, although I personally believe that Cllr. Landry-Altman should be held responsible in her role as Chair for allowing the meeting to be permeated with comments from speakers that clearly lacked decorum, there is no precedent for reading a section like Section 12 of the COC so broadly as to encompass statements permitted to be made by others in a role of chair or moderator of a meeting, nor is there any basis for extending Section 12 to encompass chairs of meetings who allow the meeting to get out of hand on its plain reading.

[90] I do, however, find that Cllr. Landry-Altman breached the rule of “decorum” in stating, with respect to a particular member of the press, “we don’t need the slant of some media person who wasn’t invited.” Effectively alleging in a public forum that a particular reporter is biased and will not report on a meeting objectively and fairly does not constitute “socially acceptable, polite behavior that shows respect and good manners.” Indeed, the press is regarded as the Fourth Pillar of Democracy, alongside the three other pillars, namely, the Executive, the Legislative and the Judiciary. Maligning the integrity of that institution, particularly by a member of another of the pillars of democracy, does not demonstrate “decorum,” or integrity.

[91] I therefore find that Cllr. Landry-Altman breached Section 12 of the COC.

### **Appropriate Penalty**

[92] If elected officials lose respect for and ignore the basic tenets of democracy, who is left to uphold them? Does the adage “the ends justify the means” entitle those in power to circumvent rules of democracy to accomplish what they believe is for the greater good, which might otherwise not be accomplished? I certainly hope that no-one reading this Report believes that this is ever acceptable.

[93] I have no doubt that the residents and businesses of the Flour Mill district experienced considerable inconvenience, upset and even physical, material and economic harm as a result of the expanded operations of the SCTC starting in March 2024. I equally have no doubt that Cllr. Landry-Altman, a councillor sincerely and passionately dedicated to her Ward 12 constituents for the past 18 years, was moved by their suffering and was determined to rectify the situation. Unfortunately, whether of her own volition or convinced by the attitudes of others, she determined that nothing short of the removal of the SCTC from the Flour Mill community would suffice to achieve that objective and she ignored the potential for changes in the SCTC’s operations making any difference.

[94] On a broader level, the Meeting is a prime example of a councillor supporting NIMBYism in its most offensive and vitriolic form. In order to advance this agenda, she actively engaged in the breach of four fundamental tenets of democracy which are enshrined in the CAN Terms of Engagement and SOP. For these breaches of s. 18.(1) of the COC, I find that a suspension of the Councillor’s pay for fifteen (15) days is appropriate.

[95] I further regard the maligning of the integrity and objectivity of a particular, identified journalist by Cllr. Landry-Altman to be a serious violation of the rules of decorum. I find that a suspension of pay for an additional five (5) days is appropriate.

**Concluding Remarks**

[96] I have found that Cllr. Landry Altmann breached both ss. 18.(1) and 12.(1) of the Code of Conduct. I have determined that an appropriate, cumulative penalty for both breaches is a suspension of the Councillor's pay for 20 days.

[97] I have dismissed the Second Complaint as against Claude Charbonneau, Chair, Flour Mill CAN, for lack of jurisdiction.

[98] This concludes my investigation.

Respectfully Submitted,



David G. Boghosian,  
Integrity Commissioner,  
City of Greater Sudbury