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Backgrounder on Ford and Ontario PC Party connected lobbyists whom Ontario's Integrity Commissioner is allowing violate Ontario's lobbying law

(December 2020)

1. Summary of the Integrity Commissioner's bad rulings

In 2018, Ontario Integrity Commissioner J. David Wake issued the first of two negligently bad decisions concerning a key rule ([section 3.4](#)) added to the *Lobbyists Registration Act (LR Act)* in July 2016. Section 3.4 prohibits lobbying any politician or other public office holder if it will create a real or potential conflict of interest.

It was negligent for Commissioner Wake to wait almost two years after section 3.4 was added to the *LR Act* before he issued a public document setting out how he was interpreting the rule. Even worse, the 2018 [Guidance for Lobbyists on Political Activity document](#) that Commissioner Wake issued was very vague, especially concerning the key issue of the time period lobbyists must stop lobbying after assisting an election candidate or politician.

Then in June 2020, Commissioner Wake issued an equally [negligently bad Interpretation Bulletin](#). The *Bulletin* says that when a lobbyist assists a politician with fundraising or campaigning or [gives them a gift](#), the conflict of interest created by the assistance or gift disappears after one year, so the lobbyist can lobby the politician and their staff after that year.

Commissioner Wake's *Bulletin* essentially ignores all commissioner and court rulings across Canada that all say that the conflict of interest created by the lobbyist's assistance or gift lasts at least until the next election and that, therefore, the lobbyist is prohibited from lobbying the politician(s) the lobbyist assisted until after the next election. **(See for details [Backgrounder on Conflict of Interest Rule in Ontario's Lobbying Law](#))**

When a person assists the leader of a party or the party in an election campaign in a significant way, or continues to assist the leader or the party in a significant

way after the election, then the person should be prohibited from lobbying anyone in the party until after the next election, given opposition party leaders control promotions (and demotions) of MPPs into and out of positions as critics and committee members.

When the person assists the party leader and party that wins the election, so that the leader becomes Premier, the person should be prohibited from lobbying anyone in the government or party until after the next election because the Premier controls:

- promotions (and demotions) of MPPs into and out of positions as Cabinet ministers, Parliamentary Assistants and committee members, and
- [appointments and removals](#) of Deputy Ministers and Assistant Deputy Ministers in every government department, who are [responsible](#) for running each department;
- [appointments and removals](#) of the heads of many other government institutions.

Based on Commissioner Wake's two negligently bad, legally incorrect decisions about section 3.4 of the *LR Act*, Commissioner Wake has gone on to let many people who assisted politicians or parties go on to lobby them one year later. If he was enforcing section 3.4 of the *LR Act* correctly, Commissioner Wake would have prohibited these people from lobbying the politicians they assisted (and, in the case of people who assisted Ford or the PC Party in the 2018 election campaign, from lobbying anyone in the Ford government) until after the next election.

In other words, Commissioner Wake is letting all of these people violate section 3.4 of the *LR Act*.

One factor in Commissioner Wake's decisions not to enforce section 3.4 of the *LR Act* correctly and strongly in the past few years could be that he could be re-appointed by the government and MPPs in the legislature for a second five-year term beginning in February 2021. As a result, Commissioner Wake had an incentive to please the Ford Cabinet and MPPs from all parties by allowing their lobbyist friends to violate section 3.4 of the *LR Act*. And, in fact, MPPs unanimously re-appointed Commissioner Wake on December 1, 2020.

Listed below in section B are the names of the dozens of lobbyists who:

- a) assisted Doug Ford in his 2018 Ontario PC Party leadership race;
- b) and/or assisted Doug Ford in the 2018 election;
- c) and/or assisted the Ontario PC Party in the 2018 election;
- d) and/or have worked for Premier Ford or a Cabinet minister since 2018 the election;
- e) and/or continue to advise Doug Ford;
- f) and/or continue to serve in a senior position in the Ontario PC Party.

and, since the 2018 election, have lobbied or continue to lobby the Ford government. **Democracy Watch's opinion is that most if not all of them are violating section 3.4 of the LR Act.**

As well, Commissioner Wake let of 23 of 27 lobbyists he found violating the *LR Act* in various ways from April 2018 up to March 2020. [Click here](#) to see details.

Given Commissioner Wake's negligently weak public enforcement record in 2018-2019 and 2019-2020, and the Commissioner's bad *Bulletin* and *Guidance* document on conflicts of interest in lobbying, it should also be assumed that some (and possibly man) of his 571 Compliance Reviews that were closed or resolved through a secret informal process, and some (and possibly many) of his 192 secret Advisory Opinions (763 secret rulings in total), also let off lobbyists even though they violated section 3.4 the *LR Act* either by lobbying in secret, or lobbying unethically.

NOTE: Commissioner Wake's office undertook 383 Compliance Reviews in 2018-2019, closing 80 of those reviews at the initial stage, and resolving 269 reviews through an informal process, while only completing full investigations of 34 situations (see [pages 50-51](#) of his *Annual Report*).

Commissioner Wake's office undertook 251 Compliance Reviews in 2019-2020, closing 55 of those reviews at the initial stage, and resolving 167 reviews through an informal process, while only completing full investigations of 29 situations (see [pages 49-50](#) of his *Annual Report*).

In addition, Commissioner Wake issued 108 Advisory Opinions in 2018-2019 (see [page 47](#) of his *Annual Report*), and 84 Advisory Opinions in 2019-2020 (see [page 45](#) of his *Annual Report*).

2. List of Ford and PC Party connected lobbyists Ontario's Integrity Commissioner is letting violate the lobbying law

Listed below are the names of the dozens of lobbyists who:

- a) assisted Doug Ford in his 2018 Ontario PC Party leadership race;
- b) and/or assisted Doug Ford in the 2018 election;
- c) and/or assisted the Ontario PC Party in the 2018 election;
- d) and/or have worked for Premier Ford or a Cabinet minister since 2018 the election;
- e) and/or continue to advise Doug Ford;
- f) and/or continue to serve in a senior position in the Ontario PC Party.

and, since the 2018 election, have lobbied or continue to lobby the Ford government. Democracy Watch's opinion is that most if not all of them are violating section 3.4 of the *LR Act*.

Some of the clients each lobbyist works for are listed below. To see all of their clients, please [click here](#) to search Ontario's Lobbying Registry using the lobbyist's name.

A. Lobbyists from Loyalist Public Affairs lobbying firm

1. [Chris Froggatt](#), who was vice-chair of Doug Ford's and the PC Party's 2018 election campaign, for more than a year has headed up the lobbying firm [Loyalist Public Affairs](#) (which he co-founded), [told the *Globe and Mail* in July 2019](#) that he was advised by the Integrity Commissioner to refrain from lobbying for only one year after the Ford government took power.

Among other big businesses, Mr. Froggatt is currently lobbying for:

- i. Pfizer Canada;
- ii. Apotex;
- iii. Life Labs;
- iv. Dollarama, and;
- v. Uber (all re: COVID-related issues).

Earlier in 2020, among other businesses, Mr. Froggatt also lobbied for Memsel Manufacturing Co. (ULC) and Moshe Rothman company on COVID-related issues,

Also earlier in 2020, Mr. Froggatt also lobbied for the following construction and property development companies:

- i. Claridge Homes (Gladstone) LP;
- ii. Dream Asset Management Corporation;
- iii. First Gulf Corporation, and;
- iv. Lazaret Capital Inc.

2. [Dan Mader](#), co-founder of the firm, worked on the Ford PC Party's 2018 election campaign. Among other big businesses, Mr. Mader is also lobbying for the same 5 businesses as Mr. Froggatt.
3. [Zahra Sultani](#) worked on the Ford PC Party's 2018 election campaign, and also worked for Ford Cabinet minister Rod Phillips. Among other big businesses, Ms. Sultani is also lobbying for Life Labs.
4. [Jared Burke](#) worked for PC MPP Natalia Kusendova from July 2018-April 2019. Among other big businesses, Mr. Burke is also lobbying for Uber.

NOTE: Loyalist Public Affairs also employs [Nikita Drakokhurst](#) who "provides strategic counsel to clients" and who worked on the Ford PC Party's 2018 election campaign, and who also worked for two Ford Cabinet ministers (as Policy Advisor to the Minister of Economic Development, Job Creation and Trade, and then as Issues Manager to the Minister of Transportation).

B. Lobbyists from Rubicon Strategy lobbying firm

5. Kory Teneycke, who was manager of the Ontario PC's 2018 election campaign, for more than a year has headed up the lobbying firm [Rubicon Strategy](#) (which he co-founded – see bios for the firm's lobbyists on linked page). He has lobbied since April 2020 for a variety of businesses, and is currently registered to lobby for Procom, and for Windstream Energy LLC.
6. Patrick Harris, Managing Partner for the firm, is [4th Vice President of the PC Party](#). Among other big businesses and organizations, Mr. Harris is currently lobbying on COVID-related issues for:
 - i. Janssen Inc. (which has [hired several lobbyists](#), as detailed below);
 - ii. Medical Pharmacies Group Ltd.;
 - iii. Innovative Medicines Canada;
 - iv. Ontario Hospitals Association, and;
 - v. Ontario Medical Association.Earlier in 2020, Patrick Harris also lobbied for Loblaw Companies, and the Canadian Online Gaming Alliance.
7. Michael Coates, Executive Chairman, [served on Premier Ford's transition team](#) in June 2018. Among other big businesses and organizations, Mr. Coates is lobbying for the Ontario Medical Association.
8. [Sarah Letersky](#) worked on the PC Party's 2018 election campaign and then [worked as](#) Director of Communications for the Minister of Economic Development, Job Creation and Trade from June 2018 to June 2019, and then as Chief of Staff for the Minister of Children, Community and Social Services from June 2019 until August 2020. Just one month after she left the Minister's office, Ms. Letersky began lobbying at Rubicon, and is currently lobbying for the same 5 big businesses and organizations as Patrick Harris.
9. [Christine Simundson](#) worked in the "war room" for the PC Party's 2018 election campaign. Among other big businesses and organizations, Ms. Simundson is lobbying for Innovative Medicines Canada, and earlier in 2020 she was also lobbying for Loblaw Companies, and Healthcare Insurance Reciprocal of Canada.
10. [Stephanie Delorme](#) (Director of Operations) who according to [Rubicon's page](#) worked for the PC Party's 2018 election campaign, lobbied in 2020 for KWG Resources Inc. (mining co.), IBM, and Peartree Financial Services Ltd.

NOTE: Rubicon Strategy also employs [Jan O'Driscoll](#), Senior Vice President, who formerly served as Chief of Staff for three Ford Cabinet ministers (Minister of Natural Resources and Forestry (July to November 2018); Minister of Transportation (November 2018 to June 2019), and; Minister of Environment, Conservation and Parks (June 2019 to January 2020).

NOTE: Rubicon Strategy also employs two other people who worked on PC Party's 2018 election campaign: [Emrys Graefe](#) (VP Digital – who also worked on Doug Ford's PC Party leadership campaign); and [Cole Hogan](#) (Director of Creative).

C. Lobbyists from Upstream Strategy Group lobbying firm

11. [Michael Diamond](#), Founding Principal of [Upstream Strategy Group](#), who [was Manager of Ford's PC Party leadership campaign and the PC Party's spring 2018 election campaign](#). Among other big businesses and organizations, Michael Diamond is lobbying for:
 - i. Janssen Inc.;
 - ii. Alpha Laboratories;
 - iii. Bayshore Health Care Ltd.Earlier in 2020, Mr. Diamond also lobbied for:
 - i. Porter Airlines Inc.;
 - ii. Koch Companies Public Sector LLC;
 - iii. Roche Diagnostics Division of Hoffman-Roche Ltd., and;
 - iv. Nurse Practitioners Association of Ontario.

12. [Christopher Chapin](#) who was Deputy Digital Director for the Ontario PC Party from June 2017 to January 2018, and then was Senior Campaign Advisor-Digital Strategy for now-Minister of Transportation and Minister of Francophone Affairs [Caroline Mulroney](#). Among other big businesses and organizations, Mr. Chapin is lobbying for the same 3 companies as Mr. Diamond, and earlier in 2020 Mr. Chapin also lobbied for the same 4 clients as Mr. Diamond as well as for Caressant Care (long-term care industry co.).

13. [Bradley Metlin](#) who was [Press Secretary to Ford's Minister of Labour](#) from July 2019 to October 2020 and then began lobbying at the end of October. Among other big businesses and organizations, Mr. Metlin is also lobbying for Bayshore Health Care Ltd.

NOTE: [Patrick Tuns](#) (now Patrick Lavelle-Tuns) was Deputy Campaign Manager Ford's 2018 leadership race and also worked on the PC Party's election campaign, then [in July 2018 joined](#) Michael Diamond's Upstream Strategy Group lobbying firm, and lobbied for many businesses and organizations from then until April 2020, including: Caressant Care (long-term care industry), Janssen Inc., Innovative Medicines Canada, Alpha Laboratories, Trillium Place Development Corporation, Bayshore HealthCare Ltd., Koch Companies Public Sector LLC, and the Cement Association of Canada. **See further below in subsection B.7** for updates about recent lobbying by Mr. Lavelle-Tuns.

D. Lobbyists from Sussex Strategy Group lobbying firm

14. [Alex Simakov](#), Associate, Energy and Environment, was Policy Advisor for the Minister of Energy, Northern Development and Mines from August 2018 to August 2019, and before that was Director of Volunteers for Caroline Mulroney's PC Party leadership campaign from February 2018 to March 2018. Since [joining Sussex in September 2019](#), he has been lobbying for a variety of businesses and organizations, including:
 - i. Enwave Energy Corporation;
 - ii. Atlantic Power Corporation;
 - iii. General Electric Canada;
 - iv. NuScale Power, LLC;
 - v. ITC Holdings Corp. (energy industry);
 - vi. Algoma Steel Inc.;
 - vii. Tesla Motors Canada ULC, and;
 - viii. NRStor Inc. (battery co.).

15. [Alexis Eaton](#), Senior Associate, Ontario Government Relations, was Director of Stakeholder Relations for Premier Ford from June 2019 to May 2020, and before that Director of Operations and Stakeholder Relations for the Treasury Board Secretariat Minister from June 2018 to June 2019, and before that Director of Correspondence and Volunteers for the PC Party's 2018 election campaign. Since [joining Sussex in May 2020](#), she has been lobbying for a variety of businesses and organizations including:
 - i. Affinity Health Care;
 - ii. HypOClN (disinfectant co.);
 - iii. Santha Technologies (health check for business offices co.);
 - iv. ONRoute, and Edwards Lifesciences Canada Inc.

NOTE: If you look at Ruling #10 on page 53 in [this PDF excerpt](#) of numbered investigation rulings from the Ontario Integrity Commissioner's *2019-2020 Annual Report*, you will see that three lobbyists were not penalized, even though they violated the *LR Act* by playing some role in organizing and selling tickets for a political party fundraising event while lobbying politicians who benefited from the event, including the party leader, because the Commissioner believed the lobbyists' claim that they didn't play a main role in organizing the event, and because Commissioner doesn't believe such fundraising causes a conflict of interest.

It is difficult to tell because his rulings are brief and vague, and he let the lobbyists off and so didn't identify them, but likely this ruling was issued in response to the [complaint filed in June 2019](#) by Democracy Watch with the Commissioner about the following three lobbyists from Sussex Strategy Group violating the provincial lobbying law (section 3.4 – see explanation above in section 1) by being on the organizing

committee and selling tickets for Premier Ford's February "2019 Toronto Leader's Dinner" fundraising event.:

16. [Paul Pellegrini](#) (President) who has lobbied in 2019-2020 for:
 - i. UPS Canada;
 - ii. Canadian Medical Nonwovens (medical mask co.);
 - iii. Camillion Corporation (portable COVID test co.);
 - iv. Ontario Home Respiratory Services Association, and;
 - v. Event Venue Coalition.

17. [Chris Benedetti](#) (Principal and Head of Energy and Environment Practice) who lobbies for almost all the same companies as Alex Simakov above, and dozens more companies and organizations in the mining, energy and development and other industries, including:
 - i. Canadian Nuclear Association;
 - ii. Kinder Morgan Inc.;
 - iii. Newmont Goldcorp Corporation;
 - iv. Kirkland Lake Gold;
 - v. IAMGOLD Corporation;
 - vi. EPCOR Utilities Inc.;
 - vii. FortisOntario Inc.;
 - viii. Aecon Inc., and;
 - ix. Gerdeau.

18. [Matthew Gibson](#) (VP Energy) who lobbies for almost all the same companies as Alex Simakov above, and many more in the mining and energy industries.

E. Lobbyists from Navigator Ltd. lobbying firm

19. [Brayden Akers](#) who was Director of Communications to Ontario's Minister of Energy, Northern Development and Mines, and Indigenous Affairs from August 2018 to May 2019, and [since joining Navigator in May 2019](#), he has lobbied for a variety of businesses and organizations, including:
 - i. Triovest (real estate development co.);
 - ii. Sienna Senior Living Inc. (long-term care co.);
 - iii. Pro Labs Diagnostics;
 - iv. Kraft Heinz Canada, and;
 - v. Interac.

20. [Shakir Chambers](#) who was Senior Policy Advisor in the Office of the Leader of the PC Party from April 2017 to July 2018, and [since joining Navigator in July 2018](#), has lobbied for a variety of businesses and organizations, including:
 - i. Alamos Gold;
 - ii. Glencore Canada;

- iii. Corbett Land Strategies (property development);
 - iv. Greenland Group (Canada) Management Company Limited (property development);
 - v. Ellis Don;
 - vi. Severn Aggregates Limited Partnership;
 - vii. Airbnb;
 - viii. Kraft Heinz Canada;
 - ix. Clorox (GLAD) Company of Canada Ltd.
21. [Jenessa Crognali](#) who was with Navigator in Toronto from April 2018 to April 2019, then was Senior Communications Advisor, Press Secretary and Issues Manager to the Attorney General in Ontario from April 2019 to August 2020, and [since joining Navigator in August 2020](#) has lobbied for the Tourism Industry Association of Ontario.

F. Lobbyists from StrategyCorp lobbying firm

22. [Carly Luis](#), who worked for Director of Strategic Communications for the then-Opposition Leader of the PC Party, from January 2017 to March 2018. In July 2018, Ms. Luis then returned to StrategyCorp and began lobbying in April 2018 through to September 2020 when she returned to become Director of Communications for Minister of Health Christine Elliot. In that 2018-2020 time period, Ms. Luis lobbied for many big businesses and organizations, including:
- i. Ontario Long Term Care Association;
 - ii. Chartwell Retirement Residences;
 - iii. Arch Capital Corporation (long-term care developer);
 - iv. Enbridge Inc.
 - v. Green Shield Canada;
 - vi. Generation PGM (mining co.);
 - vii. Presteve Foods Ltd.;
 - viii. Harte Gold Corp. (mining co.);
 - ix. Canopy Growth Corp.;
 - x. First Gulf Corporation (real estate developer);
 - xi. Hoffman-LaRoche Ltd.;
 - xii. ONEX, and;
 - xiii. Parmalat Canada.
23. [Kyle Sholes](#), who [worked for Ontario's Minister of Finance](#) from July 2018 to September 2020, most recently as Director of Legislative Affairs. He started lobbying in October 2020 for, among others, Generation PGM (mining co.), Mondelez Canada (food co.), Woodbine Entertainment Group.
24. [Leslie Noble](#), while not a former Doug Ford campaigner or recent PC Party senior official has, [according to HuffingtonPost.ca](#), since 2014 has

donated \$11,434 to various wings of the PC Party, including the leadership campaigns of Christine Elliot and Caroline Mulroney. Among other big businesses and organizations, Ms. Noble has lobbied in 2019-2020 for the Ontario Long Term Care Association, Chartwell Retirement Residences, Parmalat Canada, ONEX, Sysco Canada Inc., Enbridge Inc.

NOTE: [Mitchell Davidson](#) has worked for StrategyCorp from August 2019 on, and before that [he was Executive Director of Policy for Premier Ford](#) from June 2018 to July 2019, and before that he was Director of Policy and Legislative Affairs for the PC Party from May 2015 to June 2018.

NOTE: [Chris Loreto](#) also works for StrategyCorp, and is [1st Vice President of the Ontario PC Party](#).

G. Lobbyists from McMillan Vantage Policy Group

25. [Melanie Paradis](#) who [worked as a press secretary](#) on the Ford PC Party 2018 election campaign, and then worked for [McMillan Vantage](#) from [June 2018 to September 2020](#) (and who also continues to be a [2nd Vice-President](#) of the Ontario PC Party).
26. [Kaydee Richmond](#) was [3rd Vice President and Policy Chair](#) for the Ontario PC Party from June 2017 to November 2018 (i.e. through the 2018 Ontario election period), and since November 2020 has worked for McMillan Vantage as a lobbyist.
27. [Marisa Maslink](#) has held senior positions in the Ontario PC Party, including being on the Party executive in the lead up to the 2018 Ontario election. She started at McMillan Vantage in January 2020 and, among other big businesses and organizations, has since lobbied for Johnston Equipment Inc., Aphria Inc. (cannabis), Ontario Fruit and Vegetable Growers Association, Greyhound Canada Transportation Corporation, and POST Promise (re: COVID issues).

H. Lobbyists from Crestview Strategies lobbying firm

28. [Andrew Brander](#) was [Director of Communications for Minister Rod Phillips until July 2019](#), and has been lobbying since April 2020 for the Ontario Long Term Care Association (OLTCA).
29. [Maailah Blackwood](#) was [Manager of Strategic Communications for the Minister of Children, Community and Social Services](#) from January 2020 until October 2020 (and held other positions in the Minister's office from

July 2018 on), and is now lobbying for several businesses and organizations.

7. Other lobbyists who assisted / are still assisting Doug Ford and/or the Ontario PC Party

30. [Melissa Lantsman](#) ([click here](#) to search her Lobbying Registry report) who became a VP of lobbying firm Hill and Knowlton in June 2018 until January 2020 when she joined [Enterprise Canada](#) (and who also continues to serve as a Vice-President of the PC Party of Ontario).

Among other businesses, Ms. Lantsman has been lobbying in 2020 for:

- i. Extendicare;
- ii. Walmart;
- iii. Purolator;
- iv. True North Gaming;
- v. Ontario Pharmacists' Association;
- vi. Dynacare;
- vii. Cardinal Health, and;
- viii. IKEA Canada Ltd.

NOTE: Democracy Watch filed [a complaint in July 2019](#) about Melissa Lantsman for lobbying the Ford government after [advising Doug Ford](#) and [the Progressive Conservative Party \(PC Party\)](#) during the spring 2018 provincial election campaign, serving on Ford's transition team, and then serving as [Regional Vice President for Toronto for the PC Party](#). Ms. Lantsman also remains active on Ford's [Leaders' Advisory Council on Election Readiness](#). Given Commissioner Wake issues vague summary rulings that don't name lobbyists he has investigated unless he penalizes them (which he rarely does), it is difficult to tell whether Commissioner Wake has even investigated Democracy Watch's complaint about Ms. Lantsman's ongoing lobbying and PC Party advising.

31. [Patrick Tuns](#) (now Patrick Lavelle-Tuns) was Deputy Campaign Manager Ford's 2018 leadership race and also worked on the PC Party's election campaign, and then [in July 2018 joined](#) Michael Diamond's Upstream Strategy Group lobbying firm, and lobbied for many businesses and organizations from then until April 2020 (see details above in subsection B.3). Since April 2020, Mr. Lavelle-Tuns has been a Principal at Endgame Strategies, lobbying for, among other clients:

- i. Caessant Care (long-term care industry);
- ii. Trillium Place Development Corporation;
- iii. Kaitlin Corporation (real estate development), and;
- iv. Allvision (government advertising co.).

32. [Greg Harrington](#) was a Policy Adviser in Premier Ford's office from June 2018 to October 2019, and registered as a lobbyist in mid-April 2020, including for [Janssen Inc.](#)

33. [Maddy Stieva](#) who was Executive Assistant to the Principal Secretary in Premier Ford's office from July 2018 to January 2019, and [since joining Capital Hill Group lobbying firm in May 2019](#) has lobbied for a variety of businesses and organizations, including:
- i. CGI Inc.;
 - ii. Mihealth Global Systems Inc.;
 - iii. Canadian Stimulus Group (property development, mining and forestry investment fund);
 - iv. Clearpoint Health;
 - v. Vocera (healthcare software co.);
 - vi. Oracle Canada;
 - vii. Celgene, and;
 - viii. SAS Institute Canada Inc.
34. [Lauren McDonald](#) who was Director of Marketing for Premier Ford from July 2018 to August 2019, and since joining the firm Proof in August 2019 has lobbied for a variety of businesses and organizations, including:
- i. Revera Inc. (long-term care co.);
 - ii. eBay Canada;
 - iii. StubHub, and;
 - iv. DoorDash.
35. [Michael Wilson](#) of [Goodmans law firm](#) who was Doug Downey's Chief of Staff from June 2018 until January 2020, and then:
- i. in April 2020 was a lobbyist for Newmont Gold Corporation;
 - ii. from May 5, 2020 until June 18, 2020 was a lobbyist for Revera (long-term care co.), and;
 - iii. from May 28, 2020 until June 18, 2020 was a lobbyist for Sienna (long-term care co.).
36. [Jim Burnett](#), a partner at [Pathway Group lobbying firm since 2014](#), was Deputy Campaign Manager of Christine Elliot's PC Party leadership campaign in February-March 2018, and since then has lobbied for a variety of businesses and organizations, including:
- i. CIIC International Holding Co. Ltd. (real estate development);
 - ii. 2403502 Ontario Inc. (property development);
 - iii. Argo Development Corporation;
 - iv. Expert Shields (PPE co.)
 - v. Ontario Provincial Police Association;
 - vi. Emera Incorporated;
 - vii. Aviva;
 - viii. Hudson's Bay Company;
 - ix. Dart Canada Inc., and;
 - x. Lexmark Canada.

C. Other lobbyists Integrity Commissioner Wake has let violate the conflict of interest rule in Ontario's lobbying law

(i) 2019-2020 Annual Report rulings

In his 2019-2020 *Annual Report*, Integrity Commissioner Wake also issued five rulings that let 10 or so lobbyists off the hook even though they violated section 3.4 of the LR Act. The identities of the lobbyists are not known because the Integrity Commissioner is prohibited from disclosing the identity of a lobbyist unless he decides to penalize the lobbyist.

To see PDF excerpt of numbered investigation rulings from the Commissioner's 2019-2020 *Annual Report*, [click here](#). To see the section on lobbying in the *Annual Report* PDF (pages 50-56), [click here](#).

Ruling #6: Lobbyist not penalized, even though she violated law by working on campaign and then lobbying politician afterwards, because she didn't lobby very much.

Ruling #7: Lobbyist not penalized, even though he violated law by working on two campaigns and then lobbying both politicians one year later, because Commissioner's negligent [Bulletin](#) allows lobbying one year after assisting a politician.

Ruling #10: Three lobbyists not penalized, even though they violated the law by organizing and selling tickets for a political party fundraising event while lobbying politicians who benefited from the event, because Commissioner believed lobbyists' claim that they didn't play a main role in organizing the event, and because Commissioner doesn't believe such fundraising causes a conflict of interest.

NOTE: As noted above in the listing of lobbyists from the Sussex Strategy Group, it is difficult to tell given Commissioner Wake let them off and only issued a vague summary of his ruling, but likely this ruling was issued in response to the [complaint filed in June 2019](#) by Democracy Watch with the Commissioner about lobbyists Chris Benedetti, Paul Pellegrini and Matthew Gibson of [Sussex Strategy Group](#) violating the law by being on the organizing committee for Premier Ford's February "2019 Toronto Leader's Dinner" fundraising event.

Ruling #13: Lobbyist not penalized, even though he violated law by working on campaign and then lobbying politician afterwards, because he stopped lobbying when the Commissioner began investigating him.

Ruling #20: Senior officer at organization not penalized, even though lobbyists at organization violated the law by offering free tickets to an

event to office holders they were lobbying, because organization stopped offering tickets and the senior officer left the organization.

NOTE: As well, Integrity Commissioner Wake's *Annual Report* shows that he let off another two lobbyists during the 2019-2020 fiscal year who offered gifts to ministers or their staff whom they were lobbying (See "Invitation to a Special Event" on [page 16 of Annual Report](#), and "Ticket to Speaking Event" on [page 23 of Annual Report](#)).