

Summary of Key Information About 13 Cases of Canada’s Federal Commissioner of Lobbying and RCMP Letting Off Unnamed Lobbyists Who Violated the Federal *Lobbying Act* and/or *Lobbyists’ Code*

Canada’s federal Commissioner of Lobbying Nancy Bélanger testified on April 16, 2024 before the House Ethics Committee that she had referred 15 cases to the RCMP since she became Commissioner in January 2018 because she had reason to believe that a lobbyist had violated the federal [Lobbying Act](#), and that the RCMP had let off the lobbyists in 9 cases returned to her, and that the RCMP still had 4 cases under investigation (See [p. 12 of testimony](#)).

Commissioner Bélanger gave an update on October 6, 2025 before the House Ethics Committee, saying that she had referred 18 cases to the RCMP since she became Commissioner at the end of December 2017, and the RCMP had let off the lobbyists in 10 cases returned to her, and that 2 lobbyists had been charged by the RCMP, 2 cases were “in discussion” (whatever that means), and that the RCMP still had 2 cases under investigation (See [p. 19 of testimony](#)).

Andrew Burns, lobbyist for Marineland, was [one of the lobbyists charged by the RCMP](#), but he was then let off by the RCMP with a promise not to lobby for 12 months on any issue other than the well-being of marine mammals in arranging for their transfer out of Marineland ([Click here to see](#) update re: Mr. Burns in “Ensuring Compliance” section of the Commissioner’s *Annual Report 2023-2024*). In other words, Mr. Burns essentially faced no penalty at all even though he clearly violated the *Act*.

Gerald Paulin was the other [lobbyist charged in March 2024](#) and, according to p. 15 of the Commissioner’s [2024-2025 Annual Report](#) from last June, court proceedings were continuing at that time. The RCMP has not issued a public update concerning that prosecution since last June. Was he also let off by the RCMP with essentially no penalty?

In October 2023, Democracy Watch requested disclosure under the [Access to Information Act \(ATIA\)](#) for the RCMP’s internal investigation records in these closed cases, and filed a similar request with Commissioner Bélanger in May 2024, to examine why every lobbyist was being let off the hook. In December 2025, after taking a 4-month extension, and then another 14 months illegal delay period, Commissioner Bélanger finally disclosed heavily redacted records in 13 cases (Andrew Burns’ case is one of the 13 cases, Gerald Paulin’s case is separate from the 13 cases).

In each of the 13 cases concluded from January 2018 through to December 2025, the Commissioner investigated and concluded that there was reason to believe that a lobbyist violated the federal [Lobbying Act](#), and so referred the case to the RCMP as required under [subsection 10.4\(7\)](#) of the *Act*. Of the 13 cases, 12 were referred to the RCMP by current Commissioner of Lobbying Nancy Bélanger, and the 13th case was referred by her predecessor Commissioner Karen Shepherd.

The RCMP decided not to prosecute the lobbyists involved in the 13 cases and returned each case to Commissioner Bélanger. For each of the 13 cases (as Chart 1 below shows), she could have then issued a public ruling identifying the lobbyist and finding them in violation of the [Lobbyists' Code of Conduct](#) (which requires lobbyists to comply with the *Act*, has no limitation period on issuing rulings on violations, and only requires proof on a balance of probabilities). [A former Commissioner did this in a past case.](#) Instead, Commissioner Bélanger buried each case and covered up the lobbyist's wrongdoing without issuing a public ruling.

Commissioner Bélanger violated the federal *ATIA* by taking 14 months (from October 2024 (which the Commissioner's office set as its disclosure extension date from Democracy Watch's May 2024 request date) to December 2025) to disclose the investigation records for each of the 13 cases. [Subsection 16.2\(2\)](#) of the *ATIA* requires the Commissioner to disclose records of completed investigations within 30 days of receiving an *ATIA* request (with a reasonable extension of a few months allowed).

Commissioner Bélanger has also violated the federal *ATIA*'s disclosure requirements by redacting 80-90% of the investigation records in each of the 13 cases, which also violates the *ATIA*'s disclosure requirements. Democracy Watch filed [a complaint with the federal Information Commissioner](#) that explains why Commissioner Bélanger's redactions violate the *ATIA*, and the Information Commissioner is investigating the complaint. As noted in Chart 1 below, the records in Case File #12 include an email by Commissioner Legal Counsel Jacqueline Strandberg (at p. 207 of the File #12 record) that inaccurately states what the *ATIA* requires in its provisions covering disclosure of investigation records after an investigation is completed.

Even if the *ATIA* exemptions Commissioner Bélanger relies on for her redactions could be legally cited (which they can't), she still could have disclosed: (a) the identity of the federal politicians, public officials and government institutions that were lobbied (and interviewed for the investigation); (b) the business/organization lobbied for; (c) any general issue lobbied about; (d) the number of lobbyists involved in each case; (e) all the allegations that were investigated (some are redacted); (f) the date she initiated her investigation; (g) the date she referred each case to the RCMP, and; (h) the date the RCMP referred each case back to her. If the

allegations of illegal lobbying were made publicly in any of the cases, it is also legal under the *ATIA* and federal privacy law for the Commissioner to disclose the identities of the lobbyists who were investigated.

Chart 1 below summarizes the key information in the records for each of the Commissioner of Lobbying's 13 case files that were disclosed in response to Democracy Watch's *ATIA* request, and sets out page numbers for each record where key information is redacted or disclosed. This information is summarized in Chart 1 to make it easy for the public and media to review the records for the 13 case files, which total 5,948 pages, and because many of the records are very repetitive, with multiple versions of each investigation document in each record. [Click here to see](#) (on Google Drive) the full, heavily redacted investigation records for each of the Commissioner of Lobbying's 13 case files, and the Commissioner's final letter disclosing the records.

As noted above, Democracy Watch filed a request with the RCMP for its investigation records in 6 of the 13 cases in October 2023 (as, at the time, Commissioner Bélanger had only confirmed that she had referred 6 cases to the RCMP). The RCMP clearly violated the *ATIA* for more than two years before it finally disclosed on February 23, 2026 one heavily redacted, unclear 227-page document containing its mixed up combined investigation records for 4 of the 6 cases. This delay, and failure to disclose the records for all 6 cases, also violates the requirements in the *ATIA*. [Section 16](#) of the *ATIA* requires the RCMP to disclose records of completed investigations within 30 days of receiving an *ATIA* request (with a reasonable extension of a few months allowed).

Democracy Watch has requested that the RCMP split the document into 4 separate records, one for each of the 4 cases, and has also filed a recent *ATIA* request with the RCMP for the other 7 case files.

Democracy Watch also filed a complaint with the federal Information Commissioner, who is investigating the RCMP's failure to disclose the 6 case records as required under the *ATIA* as 6 separate documents with only legal, identified redactions.

Chart 2 below summarizes key information in the heavily redacted, 227-page record that the RCMP has disclosed containing a mixed up collection of its internal investigation records for 4 of the 6 cases. [Click here to see](#) (on Google Drive) the RCMP's record.

As Chart 1 below reveals, the records disclosed by Commissioner Bélanger show that:

- 8 of the 13 cases are about violations of the *Lobbying Act* by "hired-gun" consultant lobbyists;

- 4 are about violations by in-house business employee lobbyists, and;
- 1 is about a violation by in-house employee organization lobbyists.

Out of the 13 cases, Commissioner Bélanger concluded that the *Act* had been violated by the lobbyists involved:

- in 5 cases for failing to register and disclose lobbying;
- in 6 cases for failing to register and disclose lobbying and lobbying communications;
- in 2 cases for failing to disclose lobbying communications, and;
- in 4 of the 13 cases an additional undisclosed alleged violation was investigated.

As mentioned above, Chart 1 below also shows that Commissioner Belanger's records reveal she could have issued public rulings identifying and finding all the lobbyists in violation of the *Lobbyists' Code*, as [a former Commissioner did in a past case](#). Instead, Commissioner Bélanger abused her power (under [ss. 10.4\(1.1\)](#) of the *Lobbying Act*) by making secret decisions to let all the lobbyists off (without even identifying them publicly) for the following very questionable reasons:

- in all 13 cases because the RCMP did not prosecute the lobbyists;
- in 9 cases also because she felt too much time had passed;
- in 8 cases also because of other redacted reasons;
- in 4 cases also because she didn't think it was important/in the public interest to issue a public ruling finding the lobbyist had violated the *Lobbyists' Code*, and;
- in 1 case also because the lobbyist was now informed of the requirements of the *Act*.

Chart 1 below also shows that Commissioner Belanger shut down 1 case in 2019; 2 in 2021; 7 in 2023; 2 in 2024, and; 1 in 2025.

For more information about the summary information in Chart 1 or Chart 2 below, or about the 5,948 pages of heavily redacted records in the Commissioner of Lobbying's 13 case files, or about the RCMP's heavily redacted, 227-page record, please contact:

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Chart 1: Summary of Key Information in Commissioner of Lobbying’s 13 Case Files

Commissioner of Lobbying File Disclosure Number	Alleged Violation of federal <i>Lobbying Act</i>	Date Commissioner Investigation Opened	Date Commissioner Referred Case to RCMP	Date RCMP returned case to the Commissioner	Date Commissioner closed investigation	Reason Commissioner closed investigation
<p>File 1 File #INV02198 (72 pages)</p>	<p>Redacted (3 allegations seem to be re: consultant lobbyist failure to register/disclose their lobbying communications (pp. 3 and 49))</p>	<p>Redacted (p. 3) Sr. Investigator is Trent Helms Director of Compliance is Nancy Connolly Investigation actions list (p. 45)</p>	<p>Redacted (pp. 26, 44 and 65)</p>	<p>Redacted (p. 28) Sgt. Benjamin Bertrand</p>	<p>December 12, 2023 (p. 72)</p>	<p>RCMP did not prosecute, and lobbyist is now aware of requirements of <i>Lobbying Act</i> (p. 72)</p>
<p>File 2 File #INV01951 (58 pages)</p>	<p>In-house corporation lobbyist for failure to register/disclose lobbying and lobbying communications</p>	<p>Redacted (pp. 3, 8) Sr. Investigator is Colleen Martin (p. 8) Director of Investigations is François Bertrand (p. 1) Investigation actions list (p. 30)</p>	<p>Redacted (pp. 19-20 and 21-22)</p>	<p>Redacted (p. 30) Sgt. Benjamin Bertrand and others cc'd</p>	<p>May 2, 2024 (p. 58)</p>	<p>A long time has passed since the violation occurred, and another redacted reason (p. 58)</p>

<p>File 3 File #ADM01475 (202 pages)</p>	<p>Consultant lobbyist failed to register/disclose their lobbying and lobbying communications (pp. 11, 21, 29)</p>	<p>Redacted (pp. 65, 156 and 198) Sr. Investigator is Mario Luce Investigation actions list (pp. 27-28, 68-69, 108, 161-162)</p>	<p>Redacted (pp. 63, 65, 198)</p>	<p>Redacted (p. 200) No RCMP officers identified</p>	<p>March 28, 2023 (p. 202)</p>	<p>RCMP did not prosecute, and a long time has passed since the violation occurred (p. 201) and another redacted reason (p. 202)</p>
<p>File 4 File #INV01932 (337 pages)</p>	<p>In-house organization lobbyist failed to register/disclose their lobbying and lobbying communications (pp. 1, 15, 23)</p>	<p>Redacted (pp. 1, 15, 23) Sr. Investigator is Colleen Martin Director of Investigations is François Bertrand Investigation actions redacted</p>	<p>Redacted (pp. 63, 67-91)</p>	<p>Redacted (pp. 215-217) Sgt. Benjamin Bertrand and others cc'd</p>	<p>May 2, 2024 (p. 337)</p>	<p>A long time has passed since the violation occurred and another redacted reason (p. 337)</p>
<p>File 5 File #ADM01446 (178 pages)</p>	<p>Consultant lobbyist failed to register/disclose their lobbying (p. 74)</p>	<p>Redacted (pp. 74, 164) Sr. Investigator is Lucie Marquis (p. 7) Director of Investigations is Phil McIntosh (p. 24) Investigation actions list (pp. 76, 95)</p>	<p>Redacted (pp. 1, 91-93, 110-112)</p>	<p>Redacted (p. 176) Supt. Mike McLean (p. 1)</p>	<p>November 23, 2021 (p. 178)</p>	<p>Commissioner felt violation was not sufficiently important (pp. 177-178)</p>

<p>File 6 File #ADM01512 (p. 228) (230 pages)</p>	<p>Consultant lobbyist failed to register/disclose their lobbying and lobbying communications (pp. 20, 90)</p>	<p>Redacted (pp. 1, 8) Sr. Investigator is Mario Luce Director of Investigations is Phil McIntosh Investigation actions list (pp. 55-56, 95-96, 136, 189-190)</p>	<p>Redacted (pp. 20, 27, 226)</p>	<p>Redacted (p. 23) Supt. Mike McLean (p. 20), Sgt. Benjamin Bertrand and others cc'd (p. 27)</p>	<p>March 31, 2023 (p. 230)</p>	<p>RCMP did not prosecute, and a long time has passed since the violation occurred and other redacted reasons (p. 229-230)</p>
<p>File 7 File #ADM01422 (pp. 36, 252) (255 pages)</p>	<p>Consultant lobbyist (male, pp. 125, 132) failed to register/disclose their lobbying and lobbying communications, and another undisclosed violation (pp. 1, 12, 19)</p>	<p>Redacted (p. 1, 8) Sr. Investigator is Mario Luce Director of Investigations is Phil McIntosh Investigation actions list (pp. 99-100, 140, 176, 215)</p>	<p>Redacted (pp. 10-11, 56-57, 94-95, 135-136, 173-174, 210-211, 248-249)</p>	<p>Redacted (p. 85) Emails from RCMP discussing violation (pp. 86-93) Sgt. Benjamin Bertrand</p>	<p>March 31, 2023 (p. 255)</p>	<p>RCMP did not prosecute, and a long time has passed since the violation occurred and other redacted reasons (pp. 253-254)</p>

<p>File 8</p> <p>File #ADM01508 (p. 172)</p> <p>(332 pages)</p>	<p>In-house business Senior Officer (male, pp. 123-124, 170) failed to register/disclose lobbying communications by employees (pp. 1, 72) and another undisclosed violation (pp. 172, 210-211, 329)</p>	<p>Redacted (p. 72)</p> <p>Sr. Investigators are Lucie Marquis (p. 2) and Mario Luce (p. 8)</p> <p>Investigation actions list (pp. 38-39, 89-90, 130-131, 176-178, 228-229, 279-280)</p>	<p>Redacted (pp. 1, 32-33, 72-73, 125-127, 172-173, 210-211, 267-268, 313-314)</p>	<p>Redacted (p. 36)</p> <p>Supt. Mike McLean (p. 1), Sgt. Benjamin Bertrand and others cc'd (p. 36)</p>	<p>March 31, 2023</p> <p>(p. 332)</p>	<p>RCMP did not prosecute, and a long time has passed since the violation occurred and other redacted reasons (pp. 330-331)</p>
<p>File 9</p> <p>File #ADM00212 (pp. 9, 311)</p> <p>(443 pages)</p>	<p>Consultant lobbyist (male, p. 319) failed to register/disclose their lobbying, and another undisclosed violation (p. 9)</p> <p>(Initiated by former Commissioner Karen Shepherd)</p>	<p>Redacted</p> <p>Sr. Investigators are François de Champlain and Colleen Martin</p> <p>Director of Investigations is Phil McIntosh (pp. 9, 54, 63, 326, 335-337, 441)</p> <p>Investigation actions list (pp. 23-26, 368-370)</p> <p>Investigation interview questions (pp. 27-41, 285-289, 294-308)</p>	<p>Redacted (pp. 42-44, 148-149, 309-310, 328-332, 442)</p> <p>Referred to Dan Jakel, RCMP Officer in Charge (pp. 43, 309-310)</p>	<p>Redacted</p> <p>No RCMP email/letter in the file</p> <p>Cpl. Andrew K. Spurrell and others cc'd (pp. 148-149)</p>	<p>January 15, 2021</p> <p>(p. 443)</p>	<p>RCMP did not prosecute, and a long time has passed since the violation occurred and other redacted reasons (p. 443)</p>

<p>File 10 File #ADM00751 (p. 2) (1,008 pages)</p>	<p>Consultant lobbyist (male, pp. 699, 706) failed to register/disclose their lobbying (pp. 2, 10)</p>	<p>Redacted (pp. 2, 9, 10) (Initiated by former Commissioner Karen Shepherd) Sr. Investigator is François de Champlain (p. 2) Director of Investigations is Phil McIntosh (p. 2) Interview consent form (pp. 302, 439) Investigation actions list (pp. 417-421, 518-521) Investigation interview questions (pp. 431-434, 458-459)</p>	<p>Redacted (pp. 303, 514, 724, 1004, 1006)</p>	<p>Redacted (p. 1007) No RCMP email/letter in the file</p>	<p>July 2, 2019 (pp. 515-516, 1008)</p>	<p>RCMP did not prosecute, it is not in the public interest to issue a ruling, and a long time has passed since the violation occurred (p. 1007)</p>
<p>File 11 File #ADM01339 (672 pages)</p>	<p>In-house business Senior Officer failed to register/disclose lobbying by employees (pp. 12, 16, 91) (Initiated by former Commissioner Karen Shepherd)</p>	<p>Redacted (pp. 18-19, 235-237, 375-377) Sr. Investigator is Colleen Martin (p. 91) Investigation actions list (pp. 20-21, 93-94, 462-463, 378-384)</p>	<p>Redacted (pp. 91, 172-173, 219-222, 455, 540, 584, 623, 661)</p>	<p>Redacted (pp. 223-224) Emails from RCMP discussing violation (pp. 225-234)</p>	<p>February 6, 2023 (pp. 244-250, 667, 672)</p>	<p>RCMP did not prosecute, it “would serve no useful purpose because of the change of circumstances and passage of time” (pp. 666-667, 671-672)</p>

<p>File 12 File #ADM01230 (1,864 pages)</p>	<p>In-house business Senior Officer (male, p. 989) failed to register/disclose lobbying by employees (pp. 40-41, 636, 1058, 1848), and another undisclosed violation (pp. 121, 636, 1058, 1289, 1442-1443)</p>	<p>Redacted (pp. 121, 127, 626, 636, 1058, 1289, 1295)</p> <p>Sr. Investigators are Desmond Challenger (p. 121) and Colleen Martin (p. 195)</p> <p>Director of Investigations is Phil McIntosh (p. 121)</p> <p>Investigation actions list (pp. 43-44, 621-636, 966-973, 979-984, 1321-1322, 1384-1385, 1456-1457, 1536-1537, 1593-1594, 1693-1694, 1771-1772)</p> <p>Inaccurate email by Commissioner Legal Counsel Jacqueline Strandberg re: ATIA disclosure requirements (pp. 207, 209)</p> <p>Investigation interview questions for approx. 12 people (pp. 328-335, 373-379, 1102-1104, 1111-1113, 1147-1165, 1178-1185, 1236-1239, 1269-1288, 1299-1319)</p>	<p>Redacted (pp. 40-41, 109, 131, 626, 1058, 1289, 1442-1443, 1861)</p>	<p>Redacted (pp. 238-239, 241, 626, 1861)</p> <p>No RCMP email/letter in the file</p>	<p>May 15, 2023 (pp. 627, 1863)</p>	<p>A long time has passed since the violation occurred, RCMP did not prosecute, no compliance-based reason to issue ruling because of undisclosed reason (pp. 1861-1862)</p>
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<p>File 13 File #INV02079 (297 pages)</p>	<p>In-house business lobbyist (female, p. 141), failed to register/disclose their lobbying and lobbying communications (pp. 1, 5, 10, 33, 58, 294)</p>	<p>Redacted (p. 22, 33)</p> <p>Sr. Investigators are Laura Langeveld (p. 5, 33, 58) and Trent Helms (pp. 168-169)</p> <p>Director of Compliance is Nathalie Connolly (pp. 5, 22) and Laurent Solasse (pp. 33, 296)</p> <p>Investigation actions list (p. 84, 116)</p>	<p>Redacted (pp. 57, 82, 152-154, 268-269, 294)</p> <p>Supt. Jérémie Landry, Sgt. Benjamin Bertrand and others cc'd (pp. 152-154)</p>	<p>Redacted (p. 274, 294)</p> <p>Supt. Jérémie Landry, Sgt. Benjamin Bertrand and others cc'd</p>	<p>January 28, 2025 (p. 297)</p>	<p>Redacted, other than suggestion that reason is RCMP did not prosecute, and vague line saying (en français) "further investigation is not necessary to ensure compliance with the Act"</p> <p>(pp. 295-297)</p>
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Chart 2: Summary of Key Information in RCMP's Mixed Up Records for 4 of 6 Lobbying Cases

RCMP Disclosure File Info	Key Pages in File
<p>227-page record covering 4 case files with no clear indication in the document re: exactly which pages are about which of the 4 cases</p>	<p>At least 1 case is about a consultant lobbying failing to register/disclose their lobbying and their lobbying communications (pp. 2, 12, 22, 40, 44-47, 51 of PDF).</p> <p>At least 1 case is about consultant lobbyists failing to register/disclose their lobbying (p. 5).</p> <p>At least 1 case is about an in-house business lobbyist (Senior Officer) failing to register/disclose lobbying communications of the business' employees (p. 50 of PDF).</p>

<p>(in the column to the right are Democracy Watch's best guesses concerning which pages of the document apply to which cases)</p>	<p>It may be the same case as the above case but it cannot be determined from the disclosed record, but there is also a case of SNC-Lavalin lobbyists failing to register/disclose lobbying communications of the business' employees (pp. 55-108 of PDF (SNC-Lavalin is mentioned on p. 76)). NOTE: The report in the RCMP's PDF is clearly the same as the "Preliminary Assessment Report" record as set out at pp. 37-87 in File #8 of the Commissioner of Lobbying's 13 case files summarized above in Chart 1.</p> <p>On pp. 112-120 of the PDF, notes from Cpl. Jacques Turcotte (the date of the notes is redacted) reveal on p. 116 that federal Public Prosecution Service of Canada (PPSC) lawyer "Mary Welsh" (which could possibly be Sr. Counsel at the PPSC "Moray Welch") told Cpl. Turcotte that the "20% significant part of duties" rule in clause 7(1)(b) of the federal <i>Lobbying Act</i> is "simply not prosecutable" (see also pp. 118-119). The rule requires the senior officer of a business to register in the Registry of Lobbyists all officers and employees of the business who spend 20% or more of their time lobbying during any month-long time period.</p> <p>At least 1 case is about in-house lobbyists (Senior Officers) at more than one business failing to register/disclose lobbying by the business' employees (pp. 121-208) and were advised re: prosecution decisions by then-PPSC lawyer Christa Reccord (who was appointed in October 2024 by the Trudeau Cabinet to be a Justice of the Ontario Court of Justice). Pages 221-227 of the RCMP's PDF also seem to be about this case and are a report by Sgt. Benjamin Bertrand. On p. 224 it is revealed that the Senior Officers were not prosecuted because should all the facts "be proven beyond a reasonable doubt, there would still be no reasonable prospect of conviction" (it seems because the "unenforceable" 20% rule was at issue). In addition, p. 224 says that the Senior Officers were not prosecuted because "Public interest in the prosecution is also limited by the fact that in the end, REDACTED..."</p> <p>At least 1 other case is about an in-house lobbyist (Senior Officer) failing to register/disclose lobbying by the business' employees (pp. 209-219). NOTE: This case is identified on p. 209 of the RCMP's PDF as file #ADM01230 which is the same as File #12 of the Commissioner of Lobbying's 13 case files summarized above in Chart 1.</p>
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