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## **A Weak Lapdog**

### **Analysis of Commissioner of Lobbying Nancy Bélanger's Negligently Weak Enforcement Record from Jan. 2018 to Oct. 2025**

(May 20, 2026)

#### **1. Summary of Commissioner Bélanger's Negligently Weak Enforcement Record from January 2018 to October 2025**

The evidence on the public record from federal Commissioner of Lobbying Nancy Bélanger's annual reports and testimony before the House of Commons Standing Committee on Access to Information, Privacy and Ethics (Ethics Committee) shows that Commissioner Bélanger has let off 98% (895 out of 912) of the lobbyists she has caught violating the federal *Lobbying Act (Act)* or the *Lobbyists' Code of Conduct (Code)*.

As well, the Commissioner and Committee gutted key rules in the *Code* in 2023 in ways that allow for unethical lobbying.

In addition to this negligently weak enforcement record, which is summarized below and detailed in Parts 2-8 further below, Commissioner Bélanger has hid key details of her enforcement and is currently violating the federal *Access to Information Act* by hiding her enforcement records in at least 13 key cases of violations of the *Lobbying Act*.

##### **(a) Key Facts and Figures re: Commissioner Bélanger's Negligently Weak Enforcement Record from January 2018 to November 2024**

The following are the overall key facts and figures re: Commissioner Bélanger's negligently weak enforcement record from January 1, 2018 to October 2025:

- 1. In a clear attempt to hide her enforcement record, Commissioner Bélanger stopped updating the detailed Compliance Statistics webpage** first published by former Commissioner of Lobbying Karen Shepherd in 2012 after the House of Commons Standing Committee on Access to Information, Privacy and Ethics requested that she disclose the statistics. Commissioner Bélanger also deleted former Commissioner Sheppard's Compliance Statistics webpage from the

Commissioner's website. However, the webpage is thankfully still available from the Internet archive website <https://web.archive.org> – [click here to see it](#).

2. **Commissioner Bélanger has been hiding the following details for most of her enforcement record since she January 2018** because she deleted the Compliance Statistics webpage from her website, and failed to update the statistics in most of her annual reports:
  - a. What the alleged violation was in each case reviewed or investigated;
  - b. When each compliance action began and was concluded, and the specific reason(s) why compliance action was ceased;
  - c. The sanction applied for each violation of the *Lobbying Act* or *Lobbyists' Code* for which a public ruling was not issued.
3. **Commissioner Bélanger has let off 98% (895 out of 912) of the lobbyists she has caught violating the *Act* or *Code*** with a secret ruling so the identity of the violating lobbyist was not made public.
4. **For all 895 violations, Commissioner Bélanger was fully empowered to issue, and could have issued, a public ruling identifying and finding the lobbyist guilty of violating the *Lobbyists' Code*** as [a former Commissioner did in a past case](#). The *Code* requires lobbyists to comply with the *Act*, has no limitation period on ruling on violations, and only requires proof on balance of probability, and has no penalty other than being named and shamed.
5. **The RCMP has so far let off 93% (14 out of 15 – and possibly all 15 as the details of one case are not known) of lobbyists** whose cases Commissioner Bélanger referred to them because she concluded the lobbyist had violated the *Act*.
6. **In addition, Commissioner Bélanger and the RCMP are both currently violating the *Access to Information Act (ATIA)* by hiding their investigation records** in at least 13 key cases of violations of the *Lobbying Act* that they both let off without any charges or penalties, including violations by SNC-Lavalin lobbyists, and likely including violations by lobbyists for Facebook, WE Charity and others that would have embarrassed the Trudeau Liberal Cabinet. The federal Information Commissioner is investigating the violations of the *ATIA* by Commissioner Bélanger and the RCMP. [Click here](#) to see details.
7. **Also, Commissioner Bélanger audited lobbyists' monthly disclosures of their communications with public office holders from January 2018 to March 2023, but then stopped doing the audits** without giving any reason, even though the audits were revealing violations.
8. **As well, Commissioner Bélanger let off two lobbyists who clearly violated the *Code*** by helping Finance Minister Chrystia Freeland win an election, and serving on her riding association executive, and then lobbying her office and department soon afterwards. [Click here](#) to see details.
9. **Commissioner Bélanger also gutted key rules in the *Code* in 2023 in ways that allow for rampant unethical lobbying.** [Click here](#) to see details.
10. **Commissioner Bélanger also [used her power](#) to grant [31 exemptions](#)** to the (loophole-filled) 5-year prohibition on lobbying after leaving public office.

11. The following table shows the compliance enforcement statistics that are available from Commissioner Bélanger’s annual reports and other publicly available evidence (with some estimates included)

**Table 1**  
**Summary Statistics of Commissioner of Lobbying Nancy Bélanger’s**  
**Negligently Weak Enforcement Record from January 1, 2018 to November 5, 2024**

<b>Fiscal Year</b>	<b>Compliance Files</b>	<b>Violations found (Investigation opened)</b>	<b>No violation found</b>	<b>Public ruling of violation after investigation</b>	<b>Referred to RCMP (charge)</b>	<b>Referred Back to Comm.</b>	<b>Ceased (vague reasons in Comm. reports)</b>
2017-2018	~ 1,295	at least 90 (1)	~ 1,290	0 in 2018 (1 in 2017)	2 (1)	?	10
2018-2019	~ 1,502	at least 138 (4)	~ 1,364	0	1	?	13
2019-2020	~ 1,039	at least 126 (5)	~ 913	0	6	?	6
2020-2021	~ 1,246	At least 140 (6)	~ 1,106	0	3	?	4
2021-2022	~ 1,943	At least 239 (0)	~ 1,704	0	1	?	3
2022-2023	~ 1,584	At least 178 (3)	~ 1,406	0	1 (1)	6	5
2023-2024	~ 50	0	~ 50	1	2 (1)	6?	3
2024-2025	~ 25	1	~ 24	0	1 (1)	3	3
<b>Totals</b>	<b>~ 8,659</b>	<b>912</b>	<b>~ 7,857</b>	<b>1</b>	<b>17</b>	<b>15</b>	<b>47</b>

## 2. Excerpts from the “Compliance and Enforcement” section of the Commissioner of Lobbying’s [2017-2018 Annual Report](#)

(Karen Shepherd Commissioner from April 1, 2017 to December 31, 2018; Nancy Bélanger Commissioner from January 1, 2018 to March 31, 2018)

### Administrative review files completed

**Table 7 - Outcome of administrative review files closed in 2017-18**

<b>Administrative files closed, by outcome</b>	<b>Number Closed</b>
Unfounded – no registrable communication	4
Unfounded – no meetings arranged	1
Unfounded – no improper influence	3
Unfounded – activity not performed for payment	1
Unfounded – not a significant part of duties	1
Unfounded – accurate information in registration	1
Unfounded – registered as required	1
Subtotal unfounded	12
Founded – education and monitoring	4
Founded – investigation opened	1
Subtotal founded	5
Ceased – Various reasons under subsection 10.4(1.1)	10
Total number of administrative review files closed in 2017-18	27

Investigations opened following an administrative review

1

Administrative reviews converted to investigations

35

Referrals to a peace officer in 2017-18

2

In September 2017, following the conviction of Mr. James Carroll for failing to register an undertaking to perform consultant lobbying on behalf of a client, then Commissioner Karen E. Shepherd prohibited him from engaging in registrable lobbying activity at the federal level for a period of nine months beginning July 26, 2017.

### Compliance verifications

The following compliance verification activities were performed by the OCL in 2017-18:

- 1,112 monthly communication report verifications – to check the accuracy of the information submitted by lobbyists in monthly communication reports;
- 86 compliance assessments – to verify whether registrants who have been advised of a breach have become compliant with the Act during the subsequent 12 months;

- 94 compliance analyses – to review and compare information in the Registry with other sources to verify that it is complete and accurate; and
- 44 advisory letters sent following media monitoring – to monitor media reports, identify individuals, organizations, and corporations that may be lobbying, and verify their registration status.

### **Key Unanswered Questions in 2017-2018 Annual Report:**

1. Did Commissioner Bélanger let off 4 lobbyists with only education and monitoring, or was it Commissioner Shepherd, or both (and if so, how many each)?
2. Why did Commissioner Shepherd or Commissioner Bélanger cease 10 investigations, and how many did each cease?
3. How many of the 1,112 communication reports audited were inaccurate? How many lobbyists in total were let off in secret by Commissioner Shepherd or Commissioner Bélanger even though they had filed an inaccurate report (which is a violation of both the *Act* and the *Code*)?
4. How many of the 86 lobbyists who violated the *Act*, but were let off and then monitored in 2017-2018 to ensure they were now complying with the Act, were still violating the *Act* and were let off in secret a second time by either Commissioner Shepherd or did Commissioner Bélanger, and how many did each let off in secret?
5. How many of the lobbyists who were subject to one of the 94 compliance analyses were still violating the *Act* by failing to register their lobbying accurately? How many did Commissioner Shepherd or did Commissioner Bélanger each let off in secret?
6. How many of the 44 lobbyists sent advisory letters after media monitoring were in violation of the *Act*? How many did Commissioner Shepherd or did Commissioner Bélanger each let off in secret?

### **3. Excerpts from the “Ensuring Compliance” section of the Commissioner of Lobbying’s [2018-2019 Annual Report](#)**

#### **Targeted and proactive measures**

##### **Compliance verifications**

To promote compliance with the Act, the Office conducts verifications of corporations and organizations that are, or may be, engaged in lobbying activities. In some cases, when they are not registered and may not be aware of the requirements of the Act, the Office sends advisory letters explaining the obligations under the *Lobbying Act*. In other cases, corporations and organizations may be asked to correct or clarify inaccuracies in their registrations. In all cases, they are asked to confirm that they are compliant. This past year, 46 of these types of advisory letters were sent.

In addition, this past year, a targeted compliance analysis of the cannabis industry was conducted which involved a verification of 200 corporations and organizations. This led to 6 advisory letters being sent. One corporation registered, another was no longer in

operation, and the remaining four did not meet the requirements for registration under the *Lobbying Act*.

### **Verifying accuracy of monthly communication reports**

Each month, the Office takes a sample of new communication reports in the Registry and confirms with the listed designated public office holders that the information is correct. In 2018-19, the Office verified 1,256 communication reports. The majority (89.8%) of verified communication reports were confirmed to be accurate.

A small portion (2.9%) were "over reported", meaning that the report did not need to be submitted because there was no communication, the communication was not oral and arranged, or it was a duplicate entry.

Another portion (7.25%) were found to contain errors.

### **Investigations**

#### **Numbers at a glance**

The Office completed 21 preliminary assessments. In 17 of these, the Commissioner determined that no further action was required and the preliminary assessment was closed. The reasons for closure included: the organization was strictly volunteer based, the practice that was under assessment had ceased, no communication report was required, or information in the registration was correct. Four (4) other preliminary assessments led to investigations.

In addition, the Commissioner ceased 13 investigations. The reasons for ceasing included: the practice under investigation had stopped, the communication was a request for information and therefore not lobbying, the Code did not apply because the person was not engaged in lobbying, and the information in the Registry was accurate.

1 referral to a peace officer in 2018-19

1 referral to a peace officer in early 2019-20

1 post-conviction lobbying prohibition applied by the Commissioner in 2018-19

### **Key Unanswered Questions in 2018-2019 Annual Report:**

1. How many of the 46 lobbyists sent advisory letters after media monitoring were found to be in violation of the *Act*? How many did Commissioner Bélanger each let off in secret?
2. Why did Commissioner Bélanger let off in secret the lobbyists behind the 7.25% of communication reports that were inaccurate (91 out of 1,256 reports audited), given that filing an inaccurate communication report is a violation of the *Act*?
3. Of the 17 preliminary assessments that were closed, how many people violated the law but were let off in secret by Commissioner Bélanger because "the practice that was under assessment had ceased"?
4. Of the 13 investigations that were ceased, how many people violated the law but were let off in secret by Commissioner Bélanger because "the practice under investigation had stopped"?

#### 4. Excerpts from the “Ensuring Compliance” section of the Commissioner of Lobbying’s [2019-2020 Annual Report](#)

##### Compliance activities

The team conducted 160 compliance activities in 2019-20, including referrals to the RCMP, investigations, preliminary assessments, compliance assessments and advisory letters, with 140 (87.5%) commenced as a result of monitoring by the Office.

As of March 2020, the Office had 32 investigation-related files open: eight suspended after referral to the RCMP, 14 preliminary assessments, and 10 ongoing investigations. Some of these files were carried over from previous years.

##### Compliance activities by the numbers for 2019-20

Activity	Total
Preliminary assessments initiated	15
<ul style="list-style-type: none"> <li>• 10 due to external allegations</li> <li>• 5 resulting from internal activities</li> </ul>	
Cases closed at the preliminary assessment stage	11
Investigations initiated	5
Investigations ceased	6
Investigations completed	21
<ul style="list-style-type: none"> <li>• 19 – sponsored travel</li> <li>• 2 – in-house lobbyists</li> </ul>	
Reports on Investigation	3
<ul style="list-style-type: none"> <li>• Benjamin Bergen, Council of Canadian Innovators (March 2020)</li> <li>• Dana O’Born, Council of Canadian Innovators (March 2020)</li> <li>• Sponsored travel provided by lobbyists (April 2019)</li> </ul>	
Files sent to the RCMP	6
Compliance assessments	109
Advisory letters	30

##### Verifications of monthly communication reports

In order to ensure the timely and accurate reporting by lobbyists as required by the *Lobbying Act*, the Office extracts a sample (5%) of new communication reports filed in the Registry of Lobbyists every month and asks the designated public office holders listed in them to confirm that the information submitted in the reports is complete and correct.

##### Verification outcomes

<b>Accurate</b>	777 (88.40%)
<b>Inaccurate</b>	76 (8.65%)
<b>Includes a designated public office holder who did not participate</b>	22 (2.50%)

<b>Communication was not oral and arranged</b>	2 (0.23%)
<b>Designated public office holder unable to confirm</b>	2 (0.23%)
<b>Total</b>	879

**Key Unanswered Questions in the 2019-2020 Annual Report:**

1. Why did Commissioner Bélanger close the 11 cases closed at the preliminary stage?
2. Why did Commissioner Bélanger cease the 6 investigations?
3. How many of the lobbyists who were subject to one of the 109 compliance assessments were still violating the *Act* by failing to register their lobbying accurately? How many did Commissioner Bélanger let off in secret?
4. How many of the 30 lobbyists sent advisory letters after media monitoring were violating the *Act*? How many did Commissioner Bélanger let off in secret?
5. Why did Commissioner Bélanger let off in secret the lobbyists who filed 90 inaccurate communication reports, given filing an inaccurate report is a violation of the *Act* and the *Code*?

**5. Excerpts from the “Ensuring Compliance” section of the Commissioner of Lobbying’s [2020-2021 Annual Report](#)**

**Compliance activities**

The Compliance Directorate conducted a total of 135 activities related to the enforcement of the *Lobbying Act* and the Lobbyists' Code of Conduct in 2020-21.

Compliance Directorate initiated 28 preliminary assessments in 2020-21, with 40% of these commencing as a result of monitoring by the Office. This almost doubled the number of preliminary assessments from the previous fiscal year when the Office initiated a total of 15. Six preliminary assessments proceeded to the investigation stage, while twelve were closed.

As of March 31, 2021, the Office had 39 investigation-related files open: 10 suspended after referral to the RCMP, 24 ongoing preliminary assessments, and 5 ongoing investigations. Some of these files were carried over from previous years.

Compliance Directorate initiated 28 preliminary assessments in 2020-21, with 40% of these commencing as a result of monitoring by the Office. This almost doubled the number of preliminary assessments from the previous fiscal year when the Office initiated a total of 15. Six preliminary assessments proceeded to the investigation stage, while twelve were closed.

As of March 31, 2021, the Office had 39 investigation-related files open: 10 suspended after referral to the RCMP, 24 ongoing preliminary assessments, and 5 ongoing investigations. Some of these files were carried over from previous years.

## Compliance activities by the numbers for 2020-21

Activity		Total
Preliminary assessments initiated	<ul style="list-style-type: none"> <li>• 17 due to external allegations</li> <li>• 11 resulting from internal monitoring</li> </ul>	28
Cases closed at the preliminary assessment stage as an investigation was not necessary to ensure compliance with the <i>Lobbying Act</i>	<ul style="list-style-type: none"> <li>• 6 registration/reporting not required</li> <li>• 2 lobbyists accurately registered/reported as required</li> <li>• 1 no jurisdiction to investigate</li> <li>• 1 registration error corrected</li> <li>• 1 insufficient evidence in anonymous referral</li> <li>• 1 following a Supreme Court of Canada decision</li> </ul>	12
Investigations initiated		6
Investigations ceased		4
Report on Investigation	Five-year prohibition, David MacNaughton, Palantir Canada (March 2021)	1
Files sent to the RCMP		3
Compliance assessments		72
Advisory letters		26

### Monthly communication report verification

To ensure that monthly communication reports are accurate and complete, the Office verifies a 5% sample of all reports submitted every month with the designated public office holders mentioned in them. The *Lobbying Act* requires designated public office holders to participate in this verification.

The Office uses a completely digital verification process that allows designated public office holders to verify the reports quickly and easily from their desks – or even their kitchen tables.

The Office verified 1,250 monthly communication reports in 2020-21, up 42.2% from 879 in the previous fiscal year. The average in 2020-21 was 104 verifications per month. In previous years, the usual average of monthly communications reports verified fell somewhere between 50 and 70 per month.

Accurate	1,111
Inaccurate	87
Did not communicate	47
Not a registrable communication	1
Unable to verify	4

## Key Unanswered Questions in 2020-2021 Annual Report

1. The Commissioner initiated 28 preliminary assessments. The summary statement in the report excerpted above says “Six preliminary assessments proceeded to the investigation stage, while twelve were closed” – for a total of 18. What happened to the other 10 files? The chart excerpted above says 1 report was issued and 3 files were sent to the RCMP, so including those 4 the total goes up to 22. That still leaves the question of what happened to the other 6 files?
2. How many of the lobbyists who were subject to one of the 72 compliance assessments were still violating the *Act* by failing to register their lobbying accurately? How many did Commissioner Bélanger let off in secret?
3. How many of the 36 lobbyists sent advisory letters after media monitoring were violating the *Act*? How many did Commissioner Bélanger let off in secret?
4. What Supreme Court of Canada decision provided the reason for the Commissioner to close a preliminary assessment of a case?
5. Why did Commissioner Bélanger let off in secret the lobbyists who filed 134 inaccurate communication reports, given filing an inaccurate report is a violation of the *Act* and the *Code*?

## 6. Excerpts from the “Ensuring Compliance” section of the Commissioner of Lobbying’s [2021-2022 Annual Report](#)

### Compliance Directorate

The Compliance Directorate began 2021-22 with 24 ongoing files at the preliminary assessment stage of an investigation and initiated 22 during the year. Fourteen files were closed at the preliminary assessment stage and 1 investigation was pursued. At the beginning of this financial exercise, the Office carried forward 5 investigations from previous years. During the year, they were all finalized as indicated in the box below, including 1 where the Commissioner referred the matter to the Royal Canadian Mounted Police as she had reasonable grounds to believe an offense occurred under the *Lobbying Act*. As of March 31, 2022, 31 files were at the preliminary assessment stage while 1 was an ongoing investigation.

In addition to investigation efforts, the Office initiates compliance assessments to address late filings of registrations and late reporting of monthly communications. Follow-ups are conducted after one year of regular monitoring to ensure continued compliance. The number of compliance assessments increased from 72 in 2020-21 to 90 in 2021-22.

### Compliance statistics

Investigation activities	Description	Total
Preliminary assessments initiated	<ul style="list-style-type: none"> <li>• 8 from external referrals</li> <li>• 14 from internal activities</li> </ul>	22

Investigation activities	Description	Total
<b>Cases closed at the preliminary assessment stage</b>	• 7 no evidence of registrable lobbying	<b>14</b>
	• 3 no evidence that 5-year prohibition contravened	
	• 2 registration/reporting not required	
	• 1 insufficient evidence of a breach under the Lobbyists' Code of Conduct	
	• 1 no jurisdiction to investigate	
<b>Active investigations</b>		<b>1</b>
<b>Investigations ceased</b>		<b>3</b>
<b>Investigation reports tabled</b>	• Mark Aldridge, president & CEO, MCAP Commercial LP	<b>1</b>
<b>Suspended files</b>	• 1 file referred to the RCMP in 2021-22	<b>11</b>
	• 10 suspended files from previous years	

### **Communication report verification**

In past years, the Office verified the accuracy and completeness of a 5% sampling of all communication reports submitted by lobbyists each month. In September 2021, the Office launched a six-month pilot project and increased the sampling of monthly communication reports verifications to 10%.

The goal of this pilot project was to determine if the proportion of accurate monthly communication reports would differ by increasing the sampling size. No significant difference was noticed in the accuracy rate. The Office decided to end the pilot project in March 2022 to focus on other compliance activities.

Accurate: 1,559  
 Inaccurate: 169  
 Did not communicate: 70  
 Unable to verify: 15  
 Total: 1,813

### **Key Unanswered Questions in the 2021-2022 Annual Report**

1. The Commissioner initiated 22 preliminary assessments. The summary statement in the report excerpted above says “Fourteen files were closed at the preliminary assessment stage and 1 investigation was pursued” – for a total of 15. What happened to the other 7 files? The chart excerpted above says 1 file was sent to the RCMP, so including that the total goes up to 16. Even if that file sent to the RCMP was one of the preliminary assessment files, that still leaves the question of what happened to the other 6 files?
2. How many of the lobbyists who were subject to one of the 72 compliance assessments were still violating the *Act* by failing to register their lobbying accurately? How many did Commissioner Bélanger let off in secret?

3. Why did Commissioner Bélanger let off in secret the lobbyists who filed 239 inaccurate communication reports, given filing an inaccurate report is a violation of the *Act* and the *Code*?

## 7. Excerpts from the “Ensuring Compliance” section of the Commissioner of Lobbying’s [2022-2023 Annual Report](#)

### Compliance Directorate

The Compliance Directorate ensures that registrants, lobbyists, and former designated public office holders meet their obligations by conducting activities to enforce the *Lobbying Act* and the *Lobbyists’ Code of Conduct*.

The Compliance Directorate began 2022-23 with 31 files at the preliminary assessment stage of an investigation and 1 investigation. Thirty (30) preliminary assessments were initiated during the year, an increase of 27% over 2021-22. A total of 27 files were closed at the preliminary assessment stage while 3 investigations were pursued.

During the year, the Commissioner referred 1 investigation to the Royal Canadian Mounted Police (RCMP) as she had reasonable grounds to believe an offense occurred under the *Lobbying Act*.

When the Commissioner refers a file to the RCMP, she must suspend her investigation. If the referral does not result in a charge or conviction, the Commissioner may decide to cease the investigation or continue to investigate and report to Parliament. Following the RCMP’s decision not to pursue 6 referrals, the Commissioner ceased 5 of those investigations as there was no compliance rationale to continue them due to changes in circumstances and the amount of time passed since the underlying events took place. As of March 31st, 2023, no decision had been made with respect to the sixth referred investigation returned to the Office. At the end of March 2023, 31 files were at the preliminary assessment stage while 4 were ongoing investigations. In addition to investigation efforts, the Office conducts compliance assessments to address the late filing of registrations and communication reports. Regular monitoring is conducted for a period of 1 year to ensure continued compliance. In 2022-23, we monitored 44 lobbyists.

### Compliance statistics

Investigation activities	Description	Total
<b>Preliminary assessments initiated</b>	<ul style="list-style-type: none"> <li>17 from external referrals</li> <li>13 from internal activities</li> </ul>	<b>30</b>
<b>Cases closed at the preliminary assessment stage</b>	<ul style="list-style-type: none"> <li>16 no evidence of registrable lobbying or reporting required</li> <li>6 no evidence that significant part of duties was met</li> <li>2 no evidence of a breach under the <i>Lobbyists’ Code of Conduct</i></li> <li>3 no jurisdiction to investigate</li> </ul>	<b>27</b>
<b>Investigations ceased</b>		<b>5</b>

Investigation activities	Description	Total
Investigations referred to the RCMP in 2022-23		1
Cases as of March 31, 2023	<ul style="list-style-type: none"> <li>31 preliminary assessments</li> <li>4 investigations</li> </ul>	35

### Charge laid under the *Lobbying Act*

On September 8, 2022, the RCMP formally charged Andrew Burns under [section 14\(1\) of the Lobbying Act](#) resulting from unregistered lobbying activities he allegedly conducted on behalf of Marine Land Canada Inc., in relation to Bill S-203. This charge follows a referral by the Commissioner of Lobbying in late 2018.

When the Commissioner has reason to believe that an offence has been committed under the *Lobbying Act*, she must suspend her investigation and refer the matter to a peace officer such as the RCMP, which then conducts its own investigation.

### Communication report verification

To ensure accurate reporting by lobbyists, the Office extracts a sample (5%) of new communication reports filed in the Registry of Lobbyists every month and asks the designated public office holders named in them to confirm whether the information submitted in the reports is complete and accurate.

By the end of 2022-23, designated public office holders named in 1,510 communication reports reviewed the information and confirmed that 1,329 reports or 88% were complete and accurate.

The noticeable difference in the total number of verified communication reports between this fiscal year (1,510) and the previous one (1,813) is explained by a 6-month pilot project undertaken in 2021-22 which saw the sampling size increase to 10%. As there was no significant impact on the compliance rate, the pilot was abandoned that same year to focus on other compliance activities.

Accurate: 1,329  
 Inaccurate: 128  
 Did not communicate: 50  
 Unable to verify: 3  
 Total: 1,510

### Key Unanswered Questions in the 2022-2023 Annual Report

1. How many of the lobbyists who were subject to one of the 44 compliance assessments were still violating the *Act* by failing to register their lobbying accurately? How many did Commissioner Bélanger let off in secret?
2. Why did Commissioner Bélanger let off in secret the lobbyists who filed 178 inaccurate communication reports, given filing an inaccurate report is a violation of the *Act* and the *Code*?
3. Why did Commissioner Bélanger stop auditing monthly communication reports in March 2023, given filing an inaccurate report is a violation of the *Act* and the *Code*, even though the audits were revealing violations?

## 8. Excerpts from the “Ensuring Compliance” section of the Commissioner of Lobbying’s [2023-2024 Annual Report](#)

### Compliance

The Compliance Directorate ensures that registrants, lobbyists, and former designated public office holders meet their obligations by conducting a variety of activities to enforce the *Lobbying Act* and the *Lobbyists’ Code of Conduct*.

In addition to 37 compliance files carried over from the previous year, which included 4 ongoing investigations, the Office initiated 16 preliminary assessments during the 2023-24 fiscal year. The Commissioner closed 14 files at the preliminary assessment stage and opened 2 investigations.

During the year, the Commissioner referred 2 investigations to the Royal Canadian Mounted Police (RCMP) as she had reasonable grounds to believe an offense occurred under the *Lobbying Act*. When the Commissioner refers a file to the RCMP, she must suspend her investigation.

In 2023-24, the RCMP laid charges in one case that was referred by the Commissioner and returned 1 file without laying charges. As of March 31, 2024, the Commissioner had ceased 3 investigations, one of which was the file regarding Andrew Burns, due to the disposition of the matter.

On March 31, 2024, there were 32 files at the preliminary assessment stage, 1 ongoing investigation and 6 suspended files. Early in April 2024, the Commissioner ceased 2 additional files, leaving 4 files suspended, one of which was suspended pursuant to subsection 10.4(8) of the *Lobbying Act* because the Commissioner became aware of an ongoing parallel investigation on the same subject matter.

In addition to investigation efforts, the Office conducts compliance assessments to address late filings of registrations and late filings of communication reports. Regular monitoring is conducted for a period of 1 year to ensure continued compliance. In 2023-24, 26 lobbyists were monitored.

Further to the coming into force of the updated *Lobbyists’ Code of Conduct*, the Office also sent 8 letters to registered lobbyists to ensure compliance with the hospitality rules of the updated Code.

### Compliance statistics

Investigation activities	Description	Total
<b>Preliminary assessments initiated</b>	<ul style="list-style-type: none"> <li>8 from external referrals</li> <li>8 from internal monitoring</li> </ul>	<b>16</b>
<b>Cases closed at the preliminary assessment stage</b>	<ul style="list-style-type: none"> <li>6 no evidence of registrable lobbying</li> <li>2 insufficient evidence that significant part of duties was met</li> <li>4 no evidence of missing or incorrect information in a registration</li> <li>1 investigation not necessary to ensure compliance under the <i>Lobbyists’ Code of Conduct</i></li> </ul>	<b>14</b>

Investigation activities	Description	Total
	<ul style="list-style-type: none"> <li>1 combined with another ongoing preliminary assessment</li> </ul>	
<b>Investigations ceased</b>		<b>3</b>
<b>Investigations referred to the RCMP in 2023-24</b>		<b>2</b>
<b>Cases as of March 31, 2024</b>	<ul style="list-style-type: none"> <li>32 at the preliminary assessment stage</li> <li>1 ongoing investigation</li> </ul>	<b>33</b>
<b>Investigation reports tabled</b>	<ul style="list-style-type: none"> <li>Investigation report – Dan Lovell</li> </ul>	<b>1</b>

### Key Unanswered Questions in the 2023-2024 Annual Report

1. How many of the lobbyists who were subject to one of the 26 compliance assessments were still violating the *Act* by failing to register their lobbying accurately? How many did Commissioner Bélanger let off in secret?
2. Why did Commissioner Bélanger cease the 2 investigations other than the investigation into Andrew Burns (who was charged, signed a peace bond, and then was let off by the RCMP)?
3. Why didn't Commissioner Bélanger find Andrew Burns in violation of the *Code*, given that not complying with the spirit of the *Act* was, at the time, a violation of the *Code*?

## 9. Excerpts from the “Ensuring Compliance” section of the Commissioner of Lobbying’s [2024-2025 Annual Report](#)

### Compliance

The Compliance Directorate ensures that registrants, lobbyists, and former designated public office holders meet their obligations by conducting a variety of activities to enforce the *Lobbying Act* and the *Lobbyists’ Code of Conduct*.

In addition to 34 compliance files carried over from the previous year, which included 1 investigation, the Office initiated 25 preliminary assessments during the 2024-25 fiscal year. The Commissioner closed 21 files at the preliminary assessment stage, while 2 progressed into investigations.

During the year, the Commissioner referred 1 investigation to the Royal Canadian Mounted Police (RCMP) after determining there were reasonable grounds to believe an offence had occurred under the *Lobbying Act*. When the Commissioner refers a file to the RCMP, she must suspend her investigation.

## Compliance statistics

Compliance statistics		
Investigation activities	Description	Total
<b>Preliminary assessments initiated</b>	7 from external referrals	25
	18 from internal monitoring	
<b>Cases closed at the preliminary assessment stage</b>	7 no evidence of registrable lobbying	21
	7 no evidence that significant part of duties was met	
	3 no evidence of missing or incorrect information in a registration	
	4 investigations not necessary to ensure compliance under the <i>Lobbyists' Code of Conduct</i>	
<b>Investigations ceased</b>		3
<b>Investigations referred to the RCMP in 2024-25</b>		1
<b>Cases as of March 31, 2025</b>	35 at the preliminary assessment stage	37
	2 ongoing investigations	

In 2024-25, the RCMP returned 3 files referred by the Commissioner without laying charges. As of March 31, 2025, the Commissioner had ceased those investigations.

At the close of the fiscal year on March 31, 2025, there were 35 files at the preliminary assessment stage, 2 ongoing investigations and 4 suspended files, 3 of which are with the RCMP while 1 continues to be suspended pursuant to subsection 10.4(8) of the *Lobbying Act* because the Commissioner became aware of an ongoing parallel investigation on the same subject matter.

## Compliance assessments and letters

In addition to its investigation efforts, the Office undertakes a variety of activities to verify compliance with the *Lobbying Act* and the *Lobbyists' Code of Conduct*.

Throughout 2024-25, the Office sent 23 compliance letters to lobbyists, 12 of which were to ensure compliance with the hospitality rules of the *Lobbyists' Code of Conduct*.

The Office also conducts compliance assessments to address late filings of registrations and late filings of communication reports. Regular monitoring is conducted for a period of 1 year to ensure continued compliance. In 2024-25, 13 lobbyists were monitored.

## Update on charges laid under the Lobbying Act

### Gerald Paulin

As set out in last year's annual report, the RCMP formally charged Gerald Paulin under the *Lobbying Act* following a referral by the Commissioner of Lobbying in September 2020.

Mr. Paulin is alleged not only to have failed to file a return after undertaking to communicate and to arrange a meeting with a public office holder, but also to have received a payment contingent on the outcome of a registrable matter.

Proceedings were instituted against Mr. Paulin in the Ontario Court of Justice in Thunder Bay in March 2024. The Court subsequently heard a peremptory defence on May 12, 2025, and set the next court appearance for June 16, 2025.

### **Exemption requests for the five-year restriction on lobbying**

In 2024-25, the Office received 14 applications for exemptions to the [five-year restriction on lobbying](#) from former designated public office holders. Another 2 applications were carried over from the previous year.

Of these 16 requests:

- 5 were granted
- 6 were denied
- 4 were withdrawn
- 1 were carried over to 2025-26

While slightly lower than the number of requests received last year, the amount remains significantly higher than the number of requests received in other previous years.

### **Key Unanswered Questions in the 2024-2025 Annual Report**

1. How many of the lobbyists who were subject to one of the 23 compliance assessments were still violating the *Act* by failing to register their lobbying accurately? How many did Commissioner Bélanger let off in secret?
2. Why did Commissioner Bélanger cease the 3 investigations, other than the investigation into Gerald Paulin (who was charged by the RCMP, but may have then been let off by the RCMP like Andrew Burns was in 2024 (there is no public record of what is happening with Paulin's case))?