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Negligently Weak Lapdogs

Analysis of Federal Commissioner of Lobbying Nancy Bélanger's and the RCMP's Enforcement Record from January 2018 to April 2026

(October 1, 2026)

1. Summary of Commissioner Bélanger's and the RCMP's Negligently Weak Enforcement Record from January 2018 to April 2026

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) reveals the following key facts and figures re: Commissioner Bélanger's negligently weak enforcement record from January 1, 2018 to April 2026 (and the RCMP's equally negligent enforcement record):

- 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 Ethics Committee 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 of her enforcement record since January 2018** because she deleted the Compliance Statistics webpage from her website, and failed to include the following information in 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 each 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 99.99% (31,803 out of 31,806¹) of the violations of the *Act* or *Code* she has found**, involving an unknown number of lobbyists, with a secret

¹ NOTE: On June 8, 2026, Duff Conacher, Co-founder of Democracy Watch, [testified before the Ethics Committee](#) and stated that the Commissioner had let off almost 20,000 violations. After closer examination of the Commissioner's annual reports, Democracy Watch corrects that total to 31,806 violations.

decision or ruling so the identity of the violating lobbyist was not made public, and none of the lobbyists were penalized.

4. **For all 31,806 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](#) (which the courts upheld), and [as the Commissioner acknowledged in her Feb. 2024 ruling](#) finding a lobbyist in violation of the *Code*. The *Code* requires lobbyists to comply with the *Act*, has no limitation period, only requires balance of probability proof, and the only penalty is being named and shamed. As a result, Commissioner Bélanger has clearly failed to enforce the *Code* since 2018, and could still issue rulings identifying and finding all of the lobbyists who committed the 31,806 violations guilty of violating the *Code*.**
5. **It is impossible to determine how many of the 31,806 violations were minor**, such as registering late as a lobbyist or filing a monthly communications report just a week or two after the deadline, or initially registering inaccurate information that was corrected after being asked once by the Commissioner's office, because Commissioner Bélanger has failed to disclose details about violations for many of the years she has held the position since January 2018. **Commissioner Bélanger has hidden the details of a total of 8,984 of the 31,806 violations (See footnotes 9-15 under Table 2 below). The only clear statistics concerning relatively minor violations (See Table 2 below for details) are as follows:**
 - a. From the beginning of April 2021 to the end of March 2026, a total of 1,367 monthly communications reports were filed 16-30 days late.
 - b. From the beginning of April 2023 to the end of March 2026, a total of 571 lobbying registrations were filed 16-30 days late.
6. **It is also impossible to tell how many of the 31,806 total violations were significant**, again because Commissioner Bélanger has failed to disclose details about violations for many of the years she has held the position since January 2018. **It is clear that Commissioner Bélanger let off all of the following 5,054 significant violations (see Table 2 below for details) without identifying or penalizing the lobbyist or finding any of the lobbyists in violation of the *Code* (which, again, the Commissioner is fully empowered to do for any violation, and could still do for all these 5,054 violations):**
 - a. From the beginning of April 2023 to the end of March 2026, a total of 1,462 lobbying registrations were filed more than 30 days late. Of these, 928 were filed 31-90 days late; 400 were filed 91-180 days late, and; 134 were filed more than 180 days late, and Commissioner Bélanger let off all of these significantly late registration violations of the *Lobbying Act*.
 - b. From the beginning of April 2021 to the end of March 2026, a total of 2,326 monthly communications reports were filed more than 30 days late. Of these, 1,394 were filed 31-90 days late; 513 were filed 91-180 days late, and; 419 were filed more than 180 days late, and Commissioner Bélanger let off all of these significantly late filing violations of the *Lobbying Act*.
 - c. From the beginning of April 2020 to the end of March 2025, a total of 1,266 lobbying registrations were filed containing inaccurate information that staff at the Commissioner's office had to request the lobbyist to correct multiple times, and Commissioner Bélanger let off all these significantly inaccurate registration violations of the *Lobbying Act*. Commissioner Bélanger also neglected to include statistics concerning inaccurate registrations in her 2025-2026 annual report.

7. **The RCMP, since Commissioner Nancy Bélanger started in January 1, 2018, has so far let off 94% (15 out of 16) of lobbyists** whose cases she referred to it because she concluded the lobbyist had violated the *Act*. Two lobbyists were charged, but one (Andrew Burns) was let off and allowed to continue lobbying. As of September 30, 2026, the other case is being prosecuted and is scheduled for a court hearing in December 2026. As of March 9, 2026, the RCMP still has three cases that Commissioner Bélanger referred to it.²
8. **In addition, Commissioner Bélanger and the RCMP are both currently violating the Access to Information Act (ATIA) by hiding their investigation records** in 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.
9. **A federal Crown prosecutor told the RCMP sometime after January 2018 that one key provision of the Lobbying Act was unenforceable** and so no lobbyist would ever be prosecuted for violating that provision. This raises the questions of: When did the prosecutor tell the RCMP? Did the RCMP tell Commissioner Bélanger? If not, why not? If so, when, and what did Commissioner Bélanger do? [Click here](#) to see details in Chart 2, at p. 116 of the RCMP's document.
10. **As well, Commissioner Bélanger let off two lobbyists who clearly violated the Lobbyists' 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.
11. **Commissioner Bélanger also gutted key rules in the Lobbyists' Code in 2023 in ways that allow for rampant unethical lobbying.** [Click here](#) to see details.
12. **Commissioner Bélanger also [used her power](#) from January 2018 to April 2026 to grant [30 exemptions](#)** to the (loophole-filled) five-year prohibition on lobbying after leaving public office.

Table 1 below shows the overall compliance enforcement statistics that are available from Commissioner Bélanger's annual reports and other publicly available evidence (with some estimates included). The page numbers in the 2nd column refer to the page numbers in each annual report from which all the numbers in the table are taken and/or calculated. The Compliance Files totals in the 1st column increase significantly from 2020-21 on because the report discloses late registration violations for the first time during that fiscal year and in subsequent years.

Table 2 below sets out the statistics concerning the significant violations the Commissioner let off from April 1, 2020 to March 31, 2026 – violations involving filing lobbying registrations or communication reports more than 30 days late, or filing a lobbying registration that was inaccurate and that staff at the Commissioner's office had to request the lobbyist to correct several times.

Below Table 1 and Table 2, for easy access, are the excerpts from each of Commissioner Bélanger's annual reports since 2018 that contain the information summarized in the tables.

² According to the testimony of Commissioner Bélanger before the House of Commons Standing Committee on Access to Information, Privacy and Ethics [on May 7, 2026, at p. 2](#).

Table 1
Summary Statistics of Commissioner of Lobbying Nancy Bélanger's
Negligently Weak Enforcement Record from January 1, 2018 to March 31, 2026

Fiscal Year	Compliance monitoring, reviews, activities and formal files³	Violations found but lobbyist let off⁴ (Investigation opened)⁵	No violation found	Public ruling of violation after investigation	Referred to RCMP (Lobbyist charged)	RCMP Referred Back to Comm.	Ceased (vague reasons in Comm. reports)
2017-2018 ⁶	~ 24,513 (pp. 8-9, 14, 18)	at least 1,600 (1)	~ 22,913	0 from Jan. 1, 2018 on	1 from Jan. 1, 2018 on	?	10
2018-2019	~ 29,024 (pp. 9, 11, 12, 14)	at least 1,789 (4)	~ 27,235	1	1	?	13
2019-2020	~ 19,767 (pp. 6, 13-14, 17)	at least 1,601 (5)	~ 18,166	0	6	?	6
2020-2021	~ 41,440 (pp. 10, 15, 19, 20, 22)	~ 4,623 (6)	~ 36,817	0	3	?	4

³ The Commissioner's annual reports contain a section entitled "Ensuring Compliance" but, in fact, the Commissioner's compliance/enforcement activities include many more actions than what is described in that section. Other pages of the reports (as listed in this first column) summarize how the Commissioner reviews registrations and filings to track late registrations, late filing of monthly communication reports, inaccurate registrations, and inaccurate monthly report filings. These reviews find violations of the federal *Lobbying Act*, as it is a violation to register late, to file an inaccurate registration, to file a monthly report late and to file a monthly report inaccurately. As a result, all of these reviews are included in the total in this first column, and all of the violations found by the Commissioner from these reviews are included in the total in the second column, and all of the registrations and filings that complied with the *Act* are included in the total in the third column.

⁴ The "Violations found but lobbyist let off" total in the second column is taken from the statistics and compliance actions information throughout the Commissioner's annual report (the pages with compliance information in each annual report are listed in the first column) and include all late registrations, late filing of monthly communication reports, inaccurate registrations, and inaccurate monthly report filings and compliance

⁵ The "Investigation opened" total in brackets in the second column is taken from the statistics and compliance actions chart in the Ensuring Compliance section of the Commissioner's annual reports.

⁶ NOTE: Karen Shepherd was Commissioner of Lobbying from April 1, 2017 to December 31, 2018; Nancy Bélanger started as Commissioner on January 1, 2018, and so was Commissioner for the rest of fiscal year 2017-2018, which ended on March 31, 2018.

Fiscal Year	Compliance monitoring, reviews, activities and formal files⁷	Violations found but lobbyist let off⁸ (Investigation opened)⁹	No violation found	Public ruling of violation after investigation	Referred to RCMP (Lobbyist charged)	RCMP Referred Back to Comm.	Ceased (vague reasons in Comm. reports)
2021-2022	~ 36,505 (pp. 8-9, 13-14, 16)	~ 3,508 (0)	~ 32,997	0	1	?	3
2022-2023	~ 43,686 (pp. 11-12, 15-17)	~ 4,529 (3)	~ 39,157	0	1 (1)	6	5
2023-2024	~ 52,511 (pp. 7-11, 13-15)	~ 5,355 (2)	~ 47,156	1	2 (1)	1	3
2024-2025	~ 53,490 (pp. 6-10, 14-15)	~ 5,425 (2)	~ 48,065	0	1	3	3
2025-2026	~ 58,638 (pp. 10-12, 14-15)	~ 3,376 (0)	~ 55,262	0	3	3	4
Totals	~ 359,574	~ 31,806 (23)	~327,768	2	19¹⁰ (2)	16¹¹	51

⁷ The Commissioner's annual reports contain a section entitled "Ensuring Compliance" but, in fact, the Commissioner's compliance/enforcement activities include many more actions than what is described in that section. Other pages of the reports (as listed in the first column in Table 1) summarize how the Commissioner reviews registrations and filings to track late registrations, late filing of monthly communication reports, inaccurate registrations, and inaccurate monthly report filings. These reviews find violations of the federal *Lobbying Act*, as it is a violation to register late, to file an inaccurate registration, to file a monthly report late and to file a monthly report inaccurately. As a result, all of these reviews are included in the total in the first column in Table 1, and all of the violations found by the Commissioner from these reviews are included in the total in the second column, and all of the registrations and filings that complied with the *Act* are included in the total in the third column.

⁸ The "Violations found but lobbyist let off" total in the second column of Table 1 is taken from the statistics and compliance actions information throughout the Commissioner's annual report (the pages with compliance information in each annual report are listed in the first column) and include all late registrations, late filing of monthly communication reports, inaccurate registrations, and inaccurate monthly report filings and compliance mentioned on all the pages listed in the first column.

⁹ The "Investigation opened" total in brackets in the second column of Table 1 is taken from the statistics and compliance actions chart in the Ensuring Compliance section of the Commissioner's annual reports.

¹⁰ Confirmed by the testimony of Commissioner Bélanger before the House of Commons Standing Committee on Access to Information, Privacy and Ethics [on May 7, 2026, at p. 2.](#)

¹¹ According to the testimony of Commissioner Bélanger before the House of Commons Standing Committee on Access to Information, Privacy and Ethics [on May 7, 2026, at p. 2.](#)

Table 2

Summary Statistics of Significant Violations of the *Lobbying Act* that Commissioner of Lobbying Nancy Bélanger Let Off from April 1, 2020 to March 31, 2026

NOTE: 2020-2021 is the first year the Commissioner's annual report included the total number of late filings of lobbying registrations, and the total number of inaccurate registrations (but the 2025-2026 annual report did not include statistics re: inaccurate registrations).

2021-2022 is the first year the Commissioner's annual report included the time periods of how late monthly communication reports were filed (in the years before that, as footnotes 8 to 12 below detail, only the total number of monthly communication reports filed late were included in the Commissioner's annual report.

2023-2024 is the first year the Commissioner's annual report included the time periods of how late lobbying registrations were filed, and the only report that contains information about the number of registrations that contained inaccurate information about government funding.

As a result, Commissioner Bélanger is hiding: (i) the total number of significant violations of monthly report requirements that she let off from April 1, 2017 to March 31, 2021; (ii) the total number of significant violations of registration deadlines that she let off from April 1, 2017 to March 31, 2023, and; (iii) the total number of significant violations of registration accuracy requirements that she let off from April 1, 2017 to March 31, 2020 (and during fiscal year 2025-2026). **During the years for which Commissioner Bélanger provided detailed information, there were 5,054 significant violations, as set out below in Table 2.**

Fiscal Year	Registrations Filed 31-90 days late	Registrations Filed 91-180 days late	Registrations Filed >180 days late	Monthly Comm. Report Filed 31-90 days late	Monthly Comm. Report Filed 91-180 days late	Monthly Comm. Report Filed >180 days late	Inaccurate Registration Corrected Multiple Times
2017-2018 ¹²	No info	No info	No info	No details ¹³	No details	No details	No info
2018-2019	No info	No info	No info	No details ¹⁴	No details	No details	No info

¹² NOTE: Karen Shepherd was Commissioner of Lobbying from April 1, 2017 to December 31, 2018; Nancy Bélanger started as Commissioner on January 1, 2018, and so was Commissioner for the rest of fiscal year 2017-2018, which ended on March 31, 2018.

¹³ 1,510 monthly communication reports were filed late in 2017-2018, but the Commissioner did not provide any details in her [annual report](#) that year that detail how late those reports were filed. The 1,510 figure is a calculation based on what it says on p. 8 of that annual report – 23,218 monthly reports filed – 21,708 filed on time = 1,510 filed late.

¹⁴ 1,651 monthly communication reports were filed late in 2018-2019, but Commissioner Bélanger did not provide any details in her [annual report](#) that year that detail how late those reports were filed. The 1,651 figure is a calculation based on what it says on p. 9 of that annual report – 27,522 monthly reports filed – 94% (25,871) filed on time = 1,651 filed late.

Fiscal Year	Registrations Filed 31-90 days late	Registrations Filed 91-180 days late	Registrations Filed >180 days late	Monthly Comm. Report Filed 31-90 days late	Monthly Comm. Report Filed 91-180 days late	Monthly Comm. Report Filed >180 days late	Inaccurate Registration Corrected Multiple Times
2019-2020	No info	No info	No info	No details ¹⁵	No details	No details	No info
2020-2021	No details ¹⁶	No details	No details	No details ¹⁷	No details	No details	356
2021-2022	No details ¹⁸	No details	No details	170	61	62	274
2022-2023	No details ¹⁹	No details	No details	342	131	102	300
2023-2024	256	138	53	273	105	87	330
2024-2025	330	116	36	367	151	159	362
2025-2026	342	146	45	242	65	9	No info ²⁰
Totals	928	400	134	1,394	513	419	1,266

¹⁵ 1,475 monthly communication reports were filed late in 2019-2020, but Commissioner Bélanger did not provide any details in her [annual report](#) that year that detail how late those reports were filed. The 1,475 figure appears on p. 6 of that annual report.

¹⁶ In 2020–2021, the first year the Commissioner’s [annual report](#) has ever included any details concerning how late registrations were filed, it says on p. 15 only that 340 registrations were filed late, but it does not set out exact figures showing how many days, weeks or months these 340 registrations were filed late.

¹⁷ In 2020–2021, the first year the Commissioner’s [annual report](#) has ever included any details concerning how late monthly communication reports were filed, it says on p. 15 only that about 1,100 reports were filed 15 or fewer days late, which is about half of the 2,211 reports filed late that year. This means about 1,100 reports were filed more than 15 days late. The Commissioner’s annual report does not set out exact figures showing how many days, weeks or months these 1,100 reports were filed late.

¹⁸ In 2021–2022, the Commissioner’s [annual report](#) again included only summary details concerning how late registrations were filed. It says on p. 9 only that 352 registrations were filed late, but it does not set out exact figures showing how many days, weeks or months these 352 registrations were filed late.

¹⁹ In 2022–2023, the Commissioner’s [annual report](#) again included only summary details concerning how late registrations were filed. It says on p. 12 only that 741 registrations were filed late, but it does not set out exact figures showing how many days, weeks or months these 741 registrations were filed late.

²⁰ Without providing any explanation about why she did this, Commissioner Bélanger did not include in her [2025-2026 annual report](#) any information concerning how many inaccurate registrations were filed, which she had included in her reports from 2020-2021 to 2023-2024.

2. Excerpts from the Commissioner of Lobbying's [2017-2018 Annual Report](#) and Key Questions Raised by the Information in the Report

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

Excerpt from p. 8 of the report

Timeliness of monthly communication reports
Lobbyists must report oral and arranged communications with designated public office holders by the 15th of the month following the communication.

Timeliness remained high in 2017-18 as 21,708 (94%) of the total 23,218 monthly communication reports were filed on time.

This is the same proportion of timely monthly communication reports as the previous year.

Excerpt from p. 9 of the report

In 2017-18, the Office verified 1,112 monthly communication reports with 215 designated public office holders listed in the reports. Those verifications confirmed that 1,037 (93%) of the sampled reports were accurate. Of the 75 reports found to be inaccurate, 5 had errors such as missing names or subject matters. The remaining 70 inaccurate reports had only minor clerical errors or listed the names of individuals who were not designated public office holders.

Excerpt from the “Compliance and Enforcement” section of the report

From p. 14

Administrative review files completed

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

Administrative files closed, by outcome	Number Closed
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.

From p. 18

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. How many of the approximately 1,600 violations in 2017-2018 were significant violations (i.e. more than 30 days late filing a registration or monthly communication registration, or filing an inaccurate registration that had to be corrected more than once) and why did former Commissioner Shepherd and Commissioner Bélanger hide that key information?
2. 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)?
3. Why did Commissioner Shepherd or Commissioner Bélanger cease 10 investigations, and how many did each cease?
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 Commissioner of Lobbying's [2018-2019 Annual Report](#) and Key Questions Raised by the Information in the Report

See also p. 9

Excerpts from the “Ensuring Compliance” section of the report

From p. 11

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*.

From p. 12

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.

From p. 14

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 approximately 1,789 violations in 2018-2019 were significant violations (i.e. more than 30 days late filing a registration or monthly communication registration, or filing an inaccurate registration that had to be corrected more than once) and why did Commissioner Bélanger hide that key information?
2. 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?
3. 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*?
4. 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”?
5. 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 Commissioner of Lobbying's [2019-2020 Annual Report](#) and Key Questions Raised by the Information in the Report

See also p. 6

Excerpts from the “Ensuring Compliance” section of the report

From p. 13

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.

From p. 14

Compliance activities by the numbers for 2019-20

Activity		Total
Preliminary assessments initiated	• 10 due to external allegations • 5 resulting from internal activities	15
Cases closed at the preliminary assessment stage		11
Investigations initiated		5
Investigations ceased		6
Investigations completed	• 19 – sponsored travel • 2 – in-house lobbyists	21
Reports on Investigation	• Benjamin Bergen, Council of Canadian Innovators (March 2020) • Dana O'Born, Council of Canadian Innovators (March 2020) • Sponsored travel provided by lobbyists (April 2019)	3
Files sent to the RCMP		6
Compliance assessments		109
Advisory letters		30

From p. 17

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	
Accurate	777 (88.40%)
Inaccurate	76 (8.65%)
Includes a designated public office holder who did not participate	22 (2.50%)
Communication was not oral and arranged	2 (0.23%)
Designated public office holder unable to confirm	2 (0.23%)
Total	879

Key Unanswered Questions in the 2019-2020 Annual Report:

1. How many of the approximately 1,601 violations in 2019-2020 were significant violations (i.e. more than 30 days late filing a registration or monthly communication registration, or filing an inaccurate registration that had to be corrected more than once) and why did Commissioner Bélanger hide that key information?
2. Why did Commissioner Bélanger close the 11 cases closed at the preliminary stage?
3. Why did Commissioner Bélanger cease the 6 investigations?
4. 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?
5. 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?
6. 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 Commissioner of Lobbying's [2020-2021 Annual Report](#) and Key Questions Raised by the Information in the Report

See also p. 15

Excerpts from the “Ensuring Compliance” section of the report

From p. 19

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.

From p. 20

Compliance activities by the numbers for 2020-21

Activity		Total
Preliminary assessments initiated	• 17 due to external allegations • 11 resulting from internal monitoring	28
Cases closed at the preliminary assessment stage as an investigation was not necessary to ensure compliance with the <i>Lobbying Act</i>	• 6 registration/reporting not required • 2 lobbyists accurately registered/reported as required • 1 no jurisdiction to investigate • 1 registration error corrected • 1 insufficient evidence in anonymous referral • 1 following a Supreme Court of Canada decision	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

From p. 22

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. How many of the approximately 4,623 violations in 2020-2021 were significant violations (i.e. more than 30 days late filing a registration or monthly communication registration, or filing an inaccurate registration that had to be corrected more than once) and why did Commissioner Bélanger hide that key information?
2. 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?
3. 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?
4. 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?
5. What Supreme Court of Canada decision provided the reason for the Commissioner to close a preliminary assessment of a case?
6. 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 Commissioner of Lobbying's [2021-2022 Annual Report](#) and Key Questions Raised by the Information in the Report

From p. 8

Late communication reports

Period	Consultant	Organization	Corporation	Totals
1-15 days	302	473	127	902
16-30 days	43	122	37	202
31-90 days	22	124	24	270
91-180 days	15	28	18	61
More than 180 days	0	36	26	62
Total late	382	783	232	1,397

From p. 9

REVIEWING REGISTRATIONS

Between April 1, 2021, and March 31, 2022, the team reviewed and posted 8,001 new, reactivated and updated registrations, for an average of 667 per month. Of these, 1,520, or about 19%, were returned to the registrant only once for corrections, while another 274, or about 3.4%, were sent back for correction more than once.

Overall activity decreased 5.7% compared to 2020-21, likely due in part to the election and in part to the exceptional increases seen in the previous fiscal year where registration activity increased 24%. Compared to the numbers seen in the 2019-20 fiscal year, which also included an election, new registrations were up by 22%, updated registrations up by 15.9% and reactivated registrations down by 17.8%.

See also chart on p. 9 under heading “Registration Activity” showing 352 registrations were filed late.

Excerpts from the “Ensuring Compliance” section of the report

From p. 13

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.

From p. 14

Compliance statistics

Investigation activities	Description	Total
Preliminary assessments initiated	8 from external referrals 14 from internal activities	22
Cases closed at the preliminary assessment stage	7 no evidence of registrable lobbying 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	14
Active investigations		1
Investigations ceased		3
Investigation reports tabled	Mark Aldridge, president & CEO, MCAP Commercial LP	1
Suspended files	1 file referred to the RCMP in 2021-22 10 suspended files from previous years	11

From p. 16

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. While the report (p. 8) shows that 293 monthly communication reports were filed significantly late (more than 30 days late), how many of the other approximate total of 3,508 violations in 2021-2022 were significant violations (i.e. more than 30 days late filing a registration, or filing an inaccurate registration that had to be corrected more than once) and why did Commissioner Bélanger hide that key information?
2. 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?
3. 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?
4. 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 Commissioner of Lobbying’s [2022-2023 Annual Report](#) and Key Questions Raised by the Information in the Report

See **p. 11 chart** showing that 1,864 monthly communication reports were filed late

From p. 12

REVIEWING REGISTRATIONS

Between April 1, 2022, and March 31, 2023, the team reviewed and posted 9,120 registrations, including new, reactivated and updated registrations. This represents an average of 760 per month, a 12% increase over the previous year.

Of these, 1,749, or about 19%, were returned to the registrant only once for corrections following a review by the client services advisors, while another 300, or about 3%, were sent back for correction more than once.

The overall number of new registrations increased by 20% while the number of reactivated registrations increased by 24% in 2022-23

Excerpts from the “Ensuring Compliance” section of the report

From p. 15

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
Preliminary assessments initiated	17 from external referrals 13 from internal activities	30
Cases closed at the preliminary assessment stage	16 no evidence of registrable lobbying or reporting required 6 no evidence that significant part of duties was met	27

Investigation activities	Description	Total
	2 no evidence of a breach under the <i>Lobbyists' Code of Conduct</i> 3 no jurisdiction to investigate	
Investigations ceased		5
Investigations referred to the RCMP in 2022-23		1
Cases as of March 31, 2023	31 preliminary assessments 4 investigations	35

From p. 16

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.

From p. 17

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. While the report (p. 11) shows that 575 monthly communication reports were filed significantly late (more than 30 days late), how many of the other approximate total of 4,509 violations in 2022-2023 were significant violations (i.e. more than 30 days late filing a registration, or filing an inaccurate registration that had to be corrected more than once) and why did Commissioner Bélanger hide that key information?
2. 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?
3. 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*?
4. 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 Commissioner of Lobbying's [2023-2024 Annual Report](#) and Key Questions Raised by the Information in the Report

From p. 7

Timeliness of registrations and communication reports

Under the Lobbying Act, it is an offence to fail to register within the timelines prescribed or to file communication reports later than 15 days after the end of the month in which the communication occurred.

The Office accepts late filings to increase transparency in the Registry of Lobbyists and an investigation is conducted only where it would be necessary to ensure future compliance.

Commissioner Bélanger continues to recommend amending the Lobbying Act to allow a spectrum of sanctions to provide greater flexibility to dispense appropriate and proportionate remedies to address non-compliance with the Act, for example in cases of tardiness.

Late registrations

The vast majority, 91.8%, of registrations are filed on time. However, a total of 894 of registrations were filed late in 2023-24, a number which includes new registrations, reactivations, and updates to existing registrations.

For late new and reactivated registrations, consultant lobbyists accounted for nearly 97% of the 145 late new registrations and 87% of the 23 late reactivations.

Late updated registrations were somewhat more evenly distributed across consultants, corporations, and organizations. This represented 81% of all combined late registrations.

The Office educates lobbyists about their reporting obligations and where appropriate, monitors their compliance for one year.

See also charts on pp. 7-8 with more statistics about late registrations.

From p. 9

Late communication reports

While the majority of communication reports were filed on time (nearly 94%), any late reports hinder transparency. In total, 2,140 communication reports were filed late in 2023-24.

The vast majority of late reports were submitted between 1 and 15 days late but there were also far too many that were between 16 and 180 days late. Some were even submitted more than 180 days late.

See also charts on p. 9 with more statistics about late monthly communication reports.

From p. 10

Verification of communication reports

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 2023-24, designated public office holders named in 1,511 communication reports reviewed the information and confirmed that 1,281 reports or nearly 85% were complete and accurate. This marked a slight 3% decrease over 2022-23.

The 176 communication reports that were inaccurate contained 198 inaccuracies as some contained more than one error.

The Office reaches out to registrants and requests that they correct inaccuracies.

See also charts on p. 10 with more statistics about inaccurate monthly communication reports.

From p. 11

Reviewing registrations

Between April 1, 2023, and March 31, 2024, the team reviewed and posted 10,830 registrations, including new, reactivated, and updated registrations. This represents an average of 903 per month, a 16% increase over the previous year.

Of these 10,830 registrations, 1,441, or about 13%, were returned to the registrant once for corrections following a review by the advisory services advisors, while another 330, or about 3%, were sent back for correction more than once.

The overall number of new registrations increased by 12% while the number of updated registrations increased by 18% compared to the previous year.

Ensuring government funding information is updated

Registrants are required under the Lobbying Act to disclose any funding received from Canadian or foreign governments, including municipal, provincial, territorial, or regional governments. Government funding must be reported even if there is no relationship with the lobbying activities.

In November 2023, changes were made to the registration system to address a growing number of registrations containing outdated government funding information. The new process first notifies registrants that their information is outdated and encourages a prompt correction. If it is not updated, the system later warns registrants that they are now required to update their government funding information before they can proceed with any other activities in the system.

An automated system informed affected registrants of the upcoming changes a month prior to the November 20, 2023, implementation date. At that time, 704 registrations owned by 448 registrants contained outdated funding information, many of which were outdated by at least 18 months. Just 3 days after the new process was in place, that number had been reduced to 110 registrations owned by 76 registrants.

As of March 31, 2024, 10 active registrations remained out of date. The changes put in place will continue to remind registrants of their obligation to provide up-to-date and timely information on the government funding they receive.

Excerpts from the “Ensuring Compliance” section of the report

From p. 13

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
Preliminary assessments initiated	8 from external referrals 8 from internal monitoring	16
Cases closed at the preliminary assessment stage	6 no evidence of registrable lobbying 2 insufficient evidence that significant part of duties was met 4 no evidence of missing or incorrect information in a registration 1 investigation not necessary to ensure compliance under the <i>Lobbyists' Code of Conduct</i> 1 combined with another ongoing preliminary assessment	14
Investigations ceased		3
Investigations referred to the RCMP in 2023-24		2
Cases as of March 31, 2024	32 at the preliminary assessment stage 1 ongoing investigation	33
Investigation reports tabled	Investigation report – Dan Lovell	1

Key Unanswered Questions in the 2023-2024 Annual Report

1. While the report (p. 8) shows that 447 registrations were filed significantly late (more than 30 days late), and (p. 9) that 465 monthly communication reports were filed significantly late (more than 30 days late), how many of the other approximate total of 4,651 violations in 2023-2024 were significant violations (i.e. more than 30 days late updating a registration re: government funding (which totalled 704 violations), or filing an inaccurate registration that had to be corrected more than once) and why did Commissioner Bélanger hide that key information?
2. 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?
3. 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)?
4. 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 Commissioner of Lobbying's [2024-2025 Annual Report](#) and Key Questions Raised by the Information in the Report

From pp. 6-7

Timeliness of registrations and communication reports

Under the Lobbying Act, it is an offence to fail to register within the timelines prescribed or to file communication reports later than 15 days after the end of the month in which the communication occurred.

The Office accepts late filings to increase transparency in the Registry of Lobbyists and an investigation is conducted only where it would be necessary to ensure future compliance.

Commissioner Bélanger continues to advocate for amendments to the Lobbying Act that would introduce a broader range of sanctions. This would provide greater flexibility in applying remedies that are both appropriate and proportionate to the nature of the incident of non-compliance, such as instances of late filings, ensuring a more effective and responsive enforcement framework.

Late registrations

In 2024-25, 92.5% of registrations were filed on time, reflecting a strong overall compliance rate. A total of 1,048 of registrations were filed late, a number which includes new registrations, reactivations, and updates to existing registrations.

As in previous years, registration updates were the most frequent type of late registration, representing 81% of all late registrations. Consultants and organizations accounted for the largest proportion of late registration updates, with 39% and 41% respectively.

Notably, consultant lobbyists were responsible for nearly all late new registrations accounting for 98%—or all but 3— of the 154 late new registrations. Consultants also accounted for 83% of the late reactivations.

See also the charts on pp. 7-8 with statistics re: late registrations.

From p. 8

Late communication reports

In 2024-25, 2,120 communication reports were filed late, a modest decrease of 20 late reports compared to the previous year. While 93.4% of communication reports were filed on time, any late report hinders transparency.

The vast majority of late reports were submitted between 1 and 15 days late, at nearly 57%, while nearly 36% were submitted between 16 to 180 days late. Disappointingly, more than 7% were submitted more than 180 days late.

Even a small number of late reports can hinder timely public access to lobbying information. The Office continues to emphasize the importance of timely reporting and works with registrants to improve compliance through education and monitoring.

See also the charts on p. 9 with statistics re: late monthly report filings.

From p. 9

Verification of communication reports

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.

To allow the implementation of changes to communication reports requiring the addition of the subject matter details, the Office briefly paused its verification of communication reports. During October and November 2024, no verifications were conducted, resulting in a slightly lower than normal number of verified reports.

In 2024-25, designated public office holders named in 1,064 communication reports reviewed the information and confirmed that 929 reports, just over 87%, were complete and accurate. This marked a 2% increase over 2023-24.

The 110 communication reports that were inaccurate contained 117 inaccuracies as some contained more than one error. The Office reaches out to registrants and requests that they correct inaccuracies.

See also the charts on p. 10 with statistics re: inaccurate monthly report filings.

From p. 10

Reviewing registrations

Between April 1, 2024, and March 31, 2025, the team reviewed and posted 14,215 registrations, including new, reactivated, and updated registrations. This represents an average of 1,185 registrations per month and marks a 31% increase compared to the previous year.

Of the 14,215 registrations reviewed, 2,143—approximately 15%—were returned to the registrant at least once for corrections following a review by one of our advisors. Of these, 362 were sent back more than once.

In 2024-25, the number of new registrations totaled 2,912, a 3% decrease from 2023-24. However, the number of updated registrations rose to 10,745, an increase of 46% from 7,357 the previous year while reactivated registrations also increased by 18%, from 472 to 558.

Excerpts from the “Ensuring Compliance” section of the report

From pp. 14-15

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
Preliminary assessments initiated	7 from external referrals	25
	18 from internal monitoring	
	7 no evidence of registrable lobbying	

Compliance statistics		
Investigation activities	Description	Total
Cases closed at the preliminary assessment stage	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>	21
Investigations ceased		3
Investigations referred to the RCMP in 2024-25		1
Cases as of March 31, 2025	35 at the preliminary assessment stage 2 ongoing investigations	37

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. While the report (p. 8) shows that 482 registrations were filed significantly late (more than 30 days late), and (p. 9) that 677 monthly communication reports were filed significantly late (more than 30 days late), and that 362 registrations had to be corrected more than once, how many of the other approximate total of 5,425 violations in 2024-2025 were significant violations (i.e. more than 30 days late updating a registration re: government funding), and why did Commissioner Bélanger hide that key information, and also not give any indication that the accuracy of government funding information had even been checked (as it was in 2023-2024)?
2. 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?
3. 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))?

10. Excerpts from the Commissioner of Lobbying's [2025-2026 Annual Report](#) and Key Questions Raised by the Information in the Report

From p. 10

Late filings remain a persistent issue. Each year, approximately 8% of registrations and 6% of communication reports are submitted late. While overall compliance rates are high,

it still represents thousands of late filings annually. In 2025-26 alone, a total of 1,148 registrations (new registrations, reactivations, and updates) and 2,037 communication reports were filed late.

Consultant lobbyists account for 95% of the 212 late new registrations. As a result, there was a delay in public disclosure of the undertakings consultants had entered with their clients.

See also the charts on p. 11 with statistics re: late registrations and late monthly report filings.

From p. 12

Verification of communication reports

To ensure accurate reporting by lobbyists, the Office extracts a sample (5%) of new communication reports filed in the Registry of Lobbyists every month. The designated public office holders named in these reports are required under the Lobbying Act to confirm whether the information submitted in the reports is complete and accurate. They must do so in the prescribed time of 30 days. The Commissioner may report any failure to do so in a report.

In 2025-26, the Office requested the verification of 1,833 communication reports to 207 of designated public office holders named in these reports. Of these 1,545 were confirmed complete and accurate while another 191 contained some inaccuracies, which were then corrected. Some reports contained multiple inaccuracies.

See also the charts on p. 12 with statistics re: inaccurate monthly report filings.

Excerpts from the “Ensuring Compliance” section of the report

From pp. 14-15

Compliance

The Office 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 2 investigations, the Office initiated 20 preliminary assessments during the 2025-26 fiscal year.

In 2025-26, the RCMP returned 3 files referred by the Commissioner without laying charges. As of March 31, 2026, the Commissioner had ceased those investigations.

At the close of the fiscal year on March 31, 2026, there were 19 files at the preliminary assessment stage and 5 suspended files, 4 of which were 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.

See also the graphics on p. 14 re: compliance actions.

Update on charges laid in 2024 under the Lobbying Act

Gerald Paulin

As mentioned in the previous two annual reports, the RCMP formally charged Gerald Paulin in March 2024 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 next step in these proceedings is a trial confirmation hearing set to take place on December 11, 2026.

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 2025-26, the Office sent 27 compliance letters to lobbyists to ensure compliance with various rules or requirements. These letters addressed the potential need to register, missing subject matters in registrations and the rules related to gifts and hospitality under the Code.

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 2025-26, 7 lobbyists were monitored.

Gifts and hospitality exemptions requests

The Lobbyists' Code of Conduct prevents lobbyists from providing gifts or hospitality — directly or indirectly— to an official they lobby or expect to lobby, other than a low-value gift that is a token of appreciation, or promotional item and a low-value instance of hospitality for consumption during an in-person gathering.

The Commissioner may grant an exemption to the gift and hospitality rules by considering any relevant factors.

In 2025-26, the Office received 12 requests for exemptions related to limits on gifts and/or hospitality. While 7 were granted — 4 with conditions —, another 4 were denied and 1 was withdrawn.

Requests are submitted through a standardized online form and are typically processed within 10 business days of the Office having received all relevant information.

Exemption requests for the five-year restriction on lobbying

In 2025-26, the Office received 23 applications for exemptions to the five-year restriction on lobbying from former designated public office holders, the highest number received to-date. One additional application was carried over from the previous year.

Of these 24 exemption requests:

- 6 were granted
- 12 were denied
- 4 were withdrawn
- 2 were carried over to 2026-27

All granted exemptions are published in the Registry of Lobbyists, along with relevant information and any conditions that may apply.

Key Unanswered Questions in the 2025-2026 Annual Report

4. While the report (p. 11) shows that 533 registrations were filed significantly late (more than 30 days late), and (p. 11) that 356 monthly communication reports were filed significantly late (more than 30 days late), how many of the other approximate total of 3,376 violations in 2025-2026 were significant violations (i.e. more than 30 days late updating a registration re: government funding, and how many registrations had multiple inaccuracies that had to be corrected more than once (which Commissioner Bélanger reported on in her annual reports from 2022 to 2025)), and why did Commissioner Bélanger hide that key information, and also not give any indication that the accuracy of government funding information had even been checked (as it was in 2023-2024)?
5. How many of the lobbyists who were subject to one of the 37 compliance assessments were still violating the *Act* by failing to register their lobbying accurately? How many did Commissioner Bélanger let off in secret?
6. Why did Commissioner Bélanger cease the 4 investigations?