



**JAN 24 2018**

Mr. Duff Conacher  
Democracy Watch  
1 Nicholas Street, Suite 150  
P.O. Box 821, Stn. B,  
Ottawa, Ontario  
K1P 5P9

Mr. Conacher:

**Re:** Investigation into the alleged breach of the Lobbyists' Code of Conduct by  
Dr. Sherman

I write to you in response to your letters of October 25, 2016 and November 4, 2016, in which you alleged that Dr. Bernard (Barry) Sherman had breached the Lobbyists' Code of Conduct due to his involvement in the organization of fundraising events for the Liberal Party of Canada held on November 7, 2016 and August 26, 2015, respectively.

In relation to the November 7, 2016 fundraising event, my predecessor Mrs. Karen E. Shepherd determined that an investigation was not necessary to ensure compliance with the Lobbying Act or the Lobbyists' Code of Conduct (2015) as there was no basis to conclude that Dr. Sherman was in breach of that Code. This matter has been closed.

With respect to the August 26, 2015 fundraising event, an investigation was commenced on January 18, 2017 in relation to Dr. Sherman's alleged conduct. In accordance with the Act, an investigation is conducted when it is necessary to ensure compliance with the Code or the Act.

As you know, Dr. Sherman passed away in December 2017. Subsection 10.4(1.1) of the Lobbying Act provides me with the authority to cease an investigation if I believe there is a "valid reason for not dealing with the matter". In light of Dr. Sherman's passing, the purpose of the investigation to ensure his compliance with the Code can no longer be fulfilled.

Accordingly, I decided to cease the investigation into the allegation that Dr. Sherman was in breach of the Lobbyists' Code of Conduct (1997) in relation to the August 26, 2015 event.

Please do not hesitate to communicate with Mr. Phil McIntosh, Director, Investigations Directorate, at (613) 948-1788 should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Nancy Bélanger". The signature is fluid and cursive, with a large initial "N" and a stylized "B".

Nancy Bélanger