



December 09, 2025

Duff Conacher
Democracy Watch
P.O. Box 831, Stn. B
Ottawa ON K1P 5P9

Sent by email to: info@democracywatch.ca

Dear Duff Conacher:

Subject: ATIP Request received May 23, 2024 – Our file: A-2024-2025-005

This is further to your request, received on May 23, 2024, to obtain the following information:

“The Commissioner of Lobbying confirms on page 15 of her 2022-2023 Annual Report at: <https://lobbycanada.gc.ca/media/hkpbsbnx/annualreport-2022-23-en.pdf> that the Commissioner referred 6 case to the RCMP from January 2018 on, and that the RCMP referred 6 referrals back to the Commissioner, and that the Commissioner has ceased the investigation of 5 of the 6 situations. In testimony on April 16, 2024 before the House of Commons Standing Committee on Access to Information, Privacy and Ethics, the Commissioner provided updated information, stating that the Commissioner had referred 15 cases to the RCMP, the RCMP had laid charges in 2 cases, the RCMP still had 4 cases, and the RCMP had returned 9 cases to the Commissioner. I request the investigation files for all 9 cases and any other cases that the RCMP has returned to the Commissioner since April 16, 2024, and any cases that the RCMP returns to the Commissioner while this request is being processed. In order to expedite the processing of this request, I do not request the disclosure in any of the records that will be disclosed any personal information covered by s. 19 of the ATIA, or any proprietary third-party information covered by s. 20 of the ATIA, so no consultations will be required with anyone or any entity whose personal or third-party information is included in the records. Also in order to expediate the processing of this request, I request that the records of each of



the 9 cases be disclosed to me as those records in each case are processed and cleared for disclosure. In other words, I am requesting the records of each of the 9 cases separately and request that they be disclosed to me as soon as the records for each case are reviewed and cleared for disclosure.”

On May 28, 2024, you clarified your request as follows:

“I am requesting the records under subsection 16.2(2) of the ATIA states:

16.2(2) However, the Commissioner shall not refuse under subsection (1) to disclose any record that contains information that was created by the Commissioner or on the Commissioner’s behalf in the course of an investigation conducted by, or under the authority of, the Commissioner once the investigation and all related proceedings, if any, are finally concluded.

Every situation that the Commissioner referred to the RCMP, that the RCMP referred back to the Commissioner, and that the Commissioner has made a final decision about, fits within the scope of subsection 16.2(2), and within the scope of the request I have filed with the Commissioner’s office, as the Commissioner’s investigation and all related proceedings have finally concluded.”

Then, on May 29, 2024, following an email from the Office of the Commissioner of Lobbying (OCL), you further clarified your request in the following terms:

“I am requesting the investigations files and the final Commissioner’s reports which contain her decisions. I would very much appreciate if you could split my request into two parts, and first process and send me each final Commissioner report which contains her decisions, and then after that process and disclose the investigation files that preceded each final report.

Since January 2018, the RCMP has returned 13 cases referred by the OCL without laying any charges, one of which was referred by the previous Commissioner. I am pleased to provide you with the documents responsive to your request, which are disclosed under the authority of the Access to Information Act (ATIA). You will note that certain records or portions thereof have been redacted on the basis of one or more of the following exemptions:

- paragraph 16(1)(c) (information the disclosure of which could be reasonably be expected to be injurious to the enforcement of any law or the conduct of lawful investigation);
- subsection 16.2(1)(disclosure of records obtained by the Commissioner of Lobbying in the course of an investigation);
- subsection 19(1) (personal information);
- paragraph 21(1)(a) (advice or recommendations developed by or for a government institution);

- paragraph 21(1)(b) (account of consultations or deliberations in which employees of a government institution participate); and
- section 23 (solicitor-client privilege).

To be able to share documents with external parties, including large memory-intensive documents, the OCL has created a SharePoint environment. We will provide you with documents responsive to your request through this environment. You will receive a separate email with a link requiring that you enter your email address. Upon clicking on the "Next" button, you will be prompted to enter a verification code that will be sent to you by email and then to click on "Verify". You will have access to this environment using the same link for a period of 30 days by repeating the previous steps. I would appreciate it if you could confirm that you are able to access and download the documents at your earliest convenience.

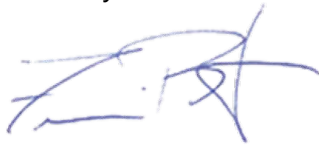
This completes our processing of your request. Should you have any questions or concerns, do not hesitate to contact me at 613-762-4815 or by e-mail at francois.bertrand@lobbycanada.gc.ca. Please be advised that you are entitled to complain to the Information Commissioner concerning the processing of your request within 60 days after the day that you become aware that grounds for a complaint exist. In the event you decide to avail yourself of this right, your notice of complaint should be addressed to:

The Information Commissioner of Canada
30 Victoria Street, 7th Floor
Gatineau, Quebec K1A 1H3

Telephone: (613) 995-2410 (National Capital Region)
1-800-267-0441 (Toll-free)

You may obtain additional information on the complaint process by visiting the website of the Office of the Information Commissioner at www.oic-ci.gc.ca.

Sincerely,



François Bertrand
ATIP Coordinator