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## **More Key Information to Close Unethical Loopholes in the Federal *Conflict of Interest Act (COIA)* and Make *COIA* Enforcement Effective**

Second submission to the Standing Committee of the House of Commons on Access to Information, Privacy and Ethics for its review of the *Conflict of Interest Act*

(April 15, 2026)

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## I. The Ethics Commissioner Misled the Committee Three Times, and the Commissioner’s Website is Also Misleading<sup>1</sup>

It is great that Conflict of Interest and Ethics Commissioner Konrad von Finckenstein recommended on p. 8 of his [2024-2025 Annual Report](#) that the *Conflict of Interest Act* (COIA), which applies to the 3,000 most powerful politicians and top government officials in the Government of Canada, be amended to prevent public office holders from being even in an apparent conflict of interest. However, Commissioner von Finckenstein should have made it clear in his *Annual Report*, and when he testified before the Ethics Committee on September 15, 2025 and December 8, 2025, that this amendment would make very little difference as long as the two biggest loopholes in the COIA – the “general application” and “broad class” loopholes – are left open, as those two loopholes mean that the COIA does not apply to 99% of the decisions and actions of these most powerful office holders. **See details below in Part VII about how to close these loopholes effectively.**

In addition, Commissioner von Finckenstein misled members of the Committee by claiming in his *Annual Report* (p. 8), that MPs are required by the [Conflict of Interest Code for Members of the House of Commons](#) (MP Code) to avoid being in even an apparent conflict of interest, and making the same claim during his testimony before the Committee on [December 8, 2025](#) (on pp. 1, 9 and 12 of the transcript).

In fact, section 2 of the *MP Code* says that MPs are only “expected” to avoid being in an apparent conflict of interest (among other expectations in section 2 including that MPs are expected to be honest, uphold the highest ethical standards, arrange their private affairs in a manner that bears the closest public scrutiny, etc.). Commissioner von Finckenstein himself [issued a ruling on December 5, 2025](#) on the floor-crossing by MP Chris d’Entremont that says that the expectations in section 2 are not enforceable:

The purposes and principles of the Code (sections 1 and 2) are not intended to stand alone as rules of conduct or obligations; rather, they serve only as aids to the interpretation of the Code.

...

Section 2 of the Code does not contain substantive rules of conduct and therefore cannot form the basis of a violation under the Code.

In addition, in his testimony on September 15th, Commissioner von Finckenstein made the ridiculous claim ([on p. 5](#)) that conflict of interest prohibitions are unnecessary when an office holder is deciding a matter that applies generally (or similarly, if that matter

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<sup>1</sup> **NOTE:** Democracy Watch files this second submission to the Committee following up on the testimony of Duff Conacher, Co-founder of Democracy Watch, before the Committee [on October 1, 2025](#), and following up on its [first submission on November 18, 2025](#) ([en français](#)), and after having reviewed all of the testimony of all witnesses before the Committee from September 24, 2025 to November 24, 2025 [listed here](#), as well as the Ethics Commissioner’s testimony before the Committee on [September 15, 2025](#) and [December 8, 2025](#). Much more detail concerning the points made in this submission can be seen in Mr. Conacher’s PhD thesis, especially chapters 4, 5 and 7, by [clicking here](#) (in English only).

affects a broad class of persons or entities). The Ethics Commissioner's in-house counsel Michael Aquilino made the claim in a similar way during the testimony on December 8 ([p. 14](#)), saying:

“If a public office holder makes a decision and incidentally has an interest, just like all the other people affected by that decision, the decision should be exempted from the allegation that it furthers the decision-maker's private interests. It will be said that the decision-maker is acting in the public interest, not in their own interest.”

Of course, these are false claims. One can say whatever one wants, but no matter what “will be said”, nothing changes the fact that the office holder is clearly in a conflict of interest whenever they are participating in or making a decision in which they have a private interest that will be affected by the decision. The fact that the decision applies generally, or that other people also have the same private interest, does not eliminate the office holder's conflict of interest or make it disappear in some magical way. The office holder is still making a decision that affects their private interest, and any other people who share that interest do not have the decision-making power that the office holder has, nor the conflict of interest that the office holder clearly has.

Commissioner von Finckenstein knows this, which makes his claim also ridiculously self-contradictory. Again, in his *Annual Report* ([p. 8](#)), when recommending that the *COIA* be amended to prohibit office holders from being in an apparent conflict of interest, he stated that:

“Similar language [prohibiting apparent conflicts of interest] is used in the [Values and Ethics Code for the Public Sector](#), which governs the conduct of all federal public servants.”

This is true (in the Expectations part, Integrity section of the *Code*). It is also true that the [Directive on Conflict of Interest](#) that also applies to all federal public servants (meaning all government employees other than the people the *COIA* applies to) also prohibits anyone from participating in any decision or action when they are in a “real, apparent or potential conflict of interest” (see Part 4 of the Directive).

As Commissioner von Finckenstein very likely knows well, there are no “general application” or “broad class” exemptions in the *Code* or in the *Directive*. Both the *Code* and the *Directive* apply to all decisions and actions of all federal public servants, without exception. The federal Cabinet ministers who imposed the *Code* and *Directive* on all federal public servants also know this.

Why did they not put these loopholes in the *Code* and *Directive*? Because they all know that a person's conflict of interest continues to exist even when they are dealing with a matter that applies generally or applies to a broad class of persons or entities, and that the only way to resolve that conflict is to require them to recuse themselves from participating in any decisions or actions that affect their private interest.

**Again, instead of pretending that conflicts of interest do not exist in these situations, see details below in Part VII** about how to close the “general application” and “broad class” loopholes in the *COIA* effectively.

The Ethics Commissioner's website is also completely misleading concerning the effects of an ethics screen, as it claims on its [Conflict of Interest Screens information notice webpage](#) that a screen is a statement in which the office holder agrees "to abstain from any discussions, decisions, debate or votes concerning the matter that forms the subject of the conflict of interest" and that an ethics screen will ensure the office holder is "not involved in decision-making processes or discussions in respect of matters that could give rise to a conflict of interest."

Nowhere on that webpage does the Ethics Commissioner acknowledge the fact that, like the *COIA* itself in ss. 2(1), all the ethics screens that have ever been established for any of the 3,000 office holders covered by the *COIA* (since former Ethics Commissioner Mary Dawson very unfortunately created and started using them back in 2007) all say that the screen does not prohibit an office holder from participating in decisions that apply generally or to a broad class of persons or entities. As a result, again, no office holder's screen applies to 99% of decisions and actions in which office holders participate given 99% of their decisions and actions apply generally or to a broad class of persons or entities.

**Yet again, instead of pretending that these two huge loopholes do not exist in the *COIA*, see details below in Part VII** about how to close the "general application" and "broad class" loopholes in the *COIA* effectively.

## **II. Brookfield's Representative Confirmed PM Carney's Trust is not Blind as PM Knows he Has an Ongoing Significant Financial Conflict of Interest**

In his [testimony before the Committee on November 24, 2025](#), Brookfield Corporation's Chief Operating Officer Justin Beber confirmed that Prime Minister Mark Carney owns long-term stock options and deferred shares in the Brookfield conglomerate that is made up of 2,000 companies, and that those options and shares cannot be sold (exercised) until the terms of the options or deferrals end in 2032-2034 because they are not "liquid" investments (See pp. 2-3, 6, 10-11, 13, 17 of his testimony).

[Mr. Carney lied during the federal election last year](#) when he claimed that he only owned cash and personal real estate. He had put his stock options and deferred shares in a so-called "blind" trust (with him choosing the trustee and giving the trustee initial instructions about what to do with his investments in Brookfield and dozens of other companies), but he still owns his options and shares in Brookfield, and he knows he owns them, because he knows that they can't be sold until 2032-2034. [Click here to see further details about PM Carney's "not-blind" trust.](#)

Unfortunately, the Ethics Committee did not ensure during the hearings that there was public disclosure of the exact types of stock options and deferred share units that Mr. Carney holds in Brookfield Corporation, and in Brookfield Asset Management, and the exact date each stock option becomes exercisable (i.e. can be sold/cashed out) and the exact date each deferred share unit becomes exercisable (i.e. can be sold/cashed out).

### **III. Top Cabinet Officials Confirmed PM Carney's Ethics Screen is a Smokescreen that the PM Partially, and Illegally, Enforces Himself**

The very broad, comprehensive prohibitions in sections [4-9](#) and [21](#) of the *COIA* make it clear that, to be effective and to comply with the *COIA*, a conflict-of-interest screen ("ethics screen") must be monitoring and preventing the office holder from participating in, or trying to influence, or using inside information to influence, any and all discussions, debates, decision-making processes and votes when they have a conflict of interest that relates to any exercise of any official power, duty or function.

These *COIA* prohibitions clearly cover:

1. All phone calls, online calls, email and text communications and meetings that the office holder participates in while on the job (other than personal calls with family members or friends), as all these communications form part of the powers, duties and functions of the office holder's position and/or some part or stage of a government decision-making/policy-making process;
2. A Cabinet committee or Cabinet as a whole participating in the development of, or discussing in any way, a policy proposal (Memo to Cabinet etc.) on a file submitted by a department or government institution, and;
3. Debates and votes in the House.

Clerk of the Privy Council and Secretary to the Cabinet Michael Sabia (who also has a blind trust) [testified before the Committee on November 19, 2025](#).

Mr. Sabia made it fairly clear that the compliance system for the Ethics Commissioner-approved ethics screen that has been in place for PM Carney since July 10, 2025 is being applied only to major government department files when he said that only a dozen government departments are involved in checking whether major files are covered by the terms of PM Carney's screen ([pp. 13-14](#)) and that "there are 13 files on which we needed to decide whether or not to apply the screen" since the screen came into force ([p. 2](#)).

Mr. Sabia also agreed to disclose details to the Committee concerning 9 of these 13 files, and the other 4 files once final decisions have been made ([p. 12](#)), so those details should be included in the Committee's report on its review of the *COIA*.

Prime Minister's Office (PMO) Chief of Staff Marc André Blanchard (who also has an ethics screen) [testified before the Committee on November 20, 2025](#). In his testimony, Mr. Blanchard confirmed that only major government department files are screened ([p. 9](#)). He also confirmed that only requests for meetings and phone calls that come through the PMO are reviewed to determine if they are covered by PM Carney's ethics screen, and that PM Carney screens his own emails, calls and texts to his cellphone, and his own discussions and meetings when he is outside of the PMO ([pp. 11-13 and 18](#)).

In other words, beyond emails, calls and texts to his own cellphone, PM Carney has also enforced his own ethics screen when participating in negotiations with provincial,

territorial and municipal governments, and negotiations of trade deals with other countries, and in the Convention on Climate Change process and other international processes in which he has participated, and during all the times in between every formal discussion and meeting in those processes when he is outside of the PMO.

This screening system violates the requirements of [PM Carney's screen statement](#) set out on in the Ethics Commissioner's Public Registry, which says that Mr. Sabia and Mr. Blanchard are supposed to administer his screen, not Mr. Carney himself.

This screening system also violates the provisions of the *COIA* because it allows PM Carney to secretly participate in discussions, decision-making processes and votes in which he has a conflict of interest through his own cell phone and through meetings and discussions he has when he is outside of the PMO.

Again, as detailed in Part I above, because of the two huge loopholes in the *COIA*, PM Carney and all other office holders covered by the *COIA* are allowed to participate in, and his screen does not apply to, discussions and decision-making processes that are about matters that apply generally or affect a broad group of individuals, businesses or other types of organizations.

However, the screening system he has established allows him to participate in discussions, decision-making processes and votes in which he has a *specific* conflict of interest that, despite the two huge loopholes in the *COIA*, is prohibited by the *COIA*, through his own cell phone and through meetings and discussions he has when he is outside of the PMO.

PM Carney's [screen statement](#), and sections [4-9](#), [21](#) and [25\(1\)](#) combined in the *COIA*, state clearly that if he learns about a discussion, decision or vote in which he has a specific conflict of interest, then he is required to recuse himself and declare it publicly in the Public Registry within 60 days with details to identify the conflict of interest that was avoided. And, if he doesn't do that, he is in clear violation of the *COIA*.

However, PM Carney has disclosed [only one recusal](#) in the Public Registry since becoming PM, and it was with regard to the appointment of a judge not with regard to any of his financial conflicts.

It is very difficult to believe, given PM Carney's extensive, significant financial conflicts of interest with more than 100 companies, including the Brookfield conglomerate of companies, that he has not been in even one situation since July 10, 2025 in which he learned about a discussion, decision or vote in which he had a specific conflict of interest.

In fact, as set out below in Part VI, there is clear evidence that PM Carney has participated in such a decision-making process that specifically affected Brookfield, and also that he has given preferential treatment to a Brookfield executive, both in violation of provisions in the *COIA*.

[Click here to see](#) further details about PM Carney's unethical smokescreen.

#### **IV. Top Cabinet Official Also Confirmed PM Carney Can't Do His Job Almost Half the Time on Major Files Because of His Dozens of Conflicts of Interest**

As mentioned in the previous section, Clerk of the Privy Council and Secretary to the Cabinet Michael Sabia (who also has a blind trust) [testified before the Committee on November 19, 2025](#). In his testimony, he said that the Ethics Commissioner-approved ethics screen that has been in place for PM Carney since July 10, 2025 is being applied only to major government department files in only a dozen government departments ([pp. 13-14](#)), and that "there are 13 files on which we needed to decide whether or not to apply the screen" since PM Carney's screen came into force on July 10, 2025 ([p. 2](#)).

Mr. Sabia then said that PM Carney was prohibited by the screen from participating in decision-making processes on six of the 13 files ([p. 2](#)).

That means, clearly, that because of his extensive financial conflicts of interest caused by his investments and relationships with the Brookfield conglomerate of companies and other companies, PM Carney cannot do his job as PM almost half the time on major files coming out of a dozen government departments.

#### **V. Cabinet Hiding Other Details Re: PM Carney's Compliance With His Initial Ethics Screens and Current Ethics-Commissioner-Approved Screen**

In August 2025, [Democracy Watch requested](#) under the federal *Access to Information Act (ATIA)* that the federal Cabinet office (PCO) disclose details concerning how and whether PM Carney had complied with the two ethics screens he self-imposed and self-administered from when he became PM at the end of March 2025 until early July 2025.

In October 2025, [Democracy Watch requested](#) under the federal *ATIA* that the PCO disclose details concerning how and whether PM Carney had complied with his Ethics Commissioner-approved ethics screen that came into force on July 10, 2025.

Both of Democracy Watch's requests ask for records that contain the following information:

1. The date the screens came into force;
2. The identities of anyone who has assisted PM Carney, his Chief of Staff and the Clerk of the PCO to enforce the screens;
3. How many discussions, decision-making processes and votes were flagged for review under the screens, and;
4. How many discussions, decision-making processes and votes that PM Carney not participate in under the screens.

The PCO chose to give themselves an extension until January 2026 for the request that Democracy Watch filed in August, and an extension until mid-March 2026 for the request filed in October. The PCO has blatantly violated the *ATIA* by failing to disclose any records as of April 15, 2026.

## **VI. From Available Evidence, Very Likely PM Carney has Violated the COIA**

Again, as detailed in Part I above, because of the two huge loopholes in the COIA, PM Carney and all other office holders covered by the COIA are allowed to participate in, and his ethics screen does not apply to, discussions and decision-making processes that are about matters that apply generally or that affect a broad group of individuals, businesses or other types of organizations.

However, the COIA does prohibit PM Carney and all office holders covered by the COIA from participating in discussions, decision-making processes and votes in which he has a *specific* conflict of interest.

It was confirmed during Mr. Blanchard's testimony before the Committee on November 19, 2025 that PM Carney participated in the decision-making process concerning tax credits for small nuclear power plants (SMRs) included in Bill C-15 ([p. 4](#)), even though Brookfield owns Westinghouse which is only one of only five companies in that sector. Five companies is not a "broad class" of companies, so that loophole in the COIA cannot be used to escape the requirement for PM Carney to recuse himself and disclose his recusal, and given the tax credit would only apply to those five companies, it is also doesn't apply generally so that loophole could also not be used to escape the requirements.

The Bill C-15 SMR tax credits were also discussed during Ethics Commissioner von Finckenstein's testimony before the Committee [on December 8, 2025](#), but the Ethics Commissioner seemed unaware that PM Carney had participated in this decision-making process that specifically benefits a Brookfield-owned company among a very small group of companies ([pp. 6-7](#)).

It seems clear that, because of the SMR tax credit provision in Bill C-15, by participating in discussions, decisions and votes re: Bill C-15 situation, PM Carney violated the COIA.

In addition, in his [testimony before the Committee on November 24, 2025](#), Brookfield Corporation's Chief Operating Officer Justin Beber confirmed that he travelled to Ottawa "on his own dime" met with PM Carney in early October to discuss "hate incidents, particularly anti-Semitism, across Canada" ([p. 17](#)).

[Section 7](#) of the COIA prohibits "preferential treatment to any person or organization based on the identity of the person or organization that represents the first-mentioned person or organization." And [section 4](#) of the COIA prohibits, among other things, exercising any function as an office holder that provides an opportunity to further the private interests of a friend or to improperly further someone's private interests.

During Ethics Commissioner von Finckenstein's testimony before the Committee [on December 8, 2025](#), he said that it was:

“unfortunate that it was done with just the two of them in the office of the Prime Minister. I think it would have been better if they had met as a group to talk with the Prime Minister so that one couldn't make the inference that some people are making, which is that this was contact by Brookfield.” ([p. 15](#))

It is highly unlikely that PM Carney would have met with Mr. Beber if Mr. Beber was not COO of Brookfield. While section 7 is awkwardly worded, Democracy Watch's opinion is that, combined with section 4, it can apply to this situation to conclude that by meeting with Mr. Beber personally to discuss Mr. Beber's personal concerns, PM Carney gave Mr. Beber preferential treatment and exercised one of his functions in violation of the *COIA*.

## **VII. Clarification For Closing the Biggest Loopholes in *COIA* – The “General Application” and “Broad Class of Persons” Loopholes**

In Part VI of its [first submission to the Committee](#) in November ([en français](#)), Democracy Watch set out the 12 key changes needed to the *COIA* to prevent, prohibit and penalize unethical activities by the PM, Cabinet ministers, their staff and Cabinet appointees.

**To remind members of the Committee, in summary the 12 key changes needed to the ethics rules in the *COIA* are:** **1.** Add a rule requiring honesty; **2.** Close the two loopholes that mean the *COIA* does not apply to 99% of decisions and actions; **3.** Prohibit office holders from having investments in businesses because they create conflicts that can't be prevented any other way; **4.** Ban the use of so-called “blind” trusts because they are not blind; **5.** Ban the use of ethics screens because they are smokescreens; **6.** Prohibit office holders from giving preferential treatment to anyone; **7.** Ban accepting any gift or benefit from anyone who is trying to influence; **8.** Require disclosure of assets and liabilities worth more than \$1,000; **9.** Extend the cooling-off period from 2 to 5 years; **10.** Clarify post-employment restrictions to prohibit former office holders doing work that definitely involves using secret information; **11.** Extend the *COIA* (or *MP Code*) to cover party leadership contestants and newly elected MPs, and; **12.** Establish a sliding scale of mandatory, significant fines for *COIA* violations (just like all federal public servants can face for violating the [Directive on Conflict of Interest](#) (see section 7 of the Directive).

In Part VII of its [first submission to the Committee](#) in November ([en français](#)), Democracy Watch also set out 7 key changes to make enforcement of the *COIA* independent, transparent, timely, effective and accountable. The enforcement system is currently partisan, political, secretive, slow, ineffective and unaccountable.

**To remind members of the Committee, in summary the 7 key *COIA* enforcement system changes are to:** **1.** Establish a fully independent, non-partisan committee to appoint the Ethics Commissioner; **2.** Require the Ethics Commissioner to conduct random, unannounced, regular audits; **3.** Require the Ethics Commissioner to publish interpretations of every provision in the law; **4.** Require all office holders to take a formal

COIA training course when they start their position; **5.** Give members of the public the right to file a complaint with the Ethics Commissioner; **6.** Require the Ethics Commissioner to issue a public ruling on every complaint and situation reviewed; **7.** Give all members of the public a clear right to apply directly to the Federal Court of Appeal for judicial review of any Ethics Commissioner decision or matter.

**The second key change in the list of 12 key changes is aimed at closing the huge loopholes in the COIA** in the definition of “private interest” (in [ss. 2\(1\)](#)). These two loopholes mean that an office holder is not in a conflict of interest, as defined by the COIA, when they are making a decision of “general application” or that applies to them as part of a “broad class of persons” or entities. In other words, they can *only* be in a conflict of interest when they are making a decision that applies specifically to one person, business or organization or a small group of people, businesses or other types of organizations.

These are huge loopholes because 99% of the decisions and actions of office holders apply generally and/or to a broad class of people or entities. These loopholes are the main reason the COIA should be called the *Almost Impossible to be in a Conflict of Interest Act*.

At the Committee hearings, some MPs raised questions about how, if these loopholes were closed, the PM, ministers, their staff and appointees would be able to participate in many decision-making processes given that they all have some unavoidable interests that conflict with their duty to uphold the public interest. For example, they all pay taxes, and they all use the health care system to some extent, and many own a house and/or other properties and have children in schools and/or parents in retirement homes and immediate family members, relatives and friends with other private interests.

While this is true, it is not a valid justification for keeping two loopholes that essentially make the conflict of interest rules in the COIA not apply 99% of the time. To have the COIA be effective at all at preventing conflicts, these loopholes must be closed.

**First**, the “general application” and “broad class of persons” loopholes in the definition of “private interest” in ss. 2(1) of the COIA should be restricted so that they only apply when a public office holder is dealing with a matter that actually affects them and all Canadians in exactly the same way, like the matter of setting income tax rates, as long as the decision made does not affect them in any specific way directly or indirectly (such as an office holder participating in a decision-making process about adding an exemption to income taxes that they and only a portion of taxpayers would be qualified to claim).

**Secondly**, these loopholes should be restricted so that they do not allow an office holder to participate in any discussion, decision or vote about anything that affects, directly or indirectly, any financial investments the office holder has. The conflicts caused by financial interests would be prevented if, as Democracy Watch set out in its [first submission to the Committee](#) in November ([en français](#)), Part VI, recommendation #3, the COIA is changed to prohibit public office holders covered by the COIA from having investments in businesses in any way, including through an open-ended mutual

fund or exchange-traded fund (ETF) or any other type of financial instrument. They would be allowed to hold guaranteed investment certificates (GICs) and government bonds that pay a fixed rate of interest, and then they could invest again in businesses when they leave office. If they face a capital gains tax or other tax from selling their investments when they become a public office holder, that tax payment should be reduced as an incentive to serve in public office. If this change to prohibit investments is not made, then the loopholes should be restricted as described above.

**Thirdly**, these loopholes should be restricted so that they do not allow an office holder to participate in any discussion, decision or vote about anything that affects, directly or indirectly, the interests of anyone or any entity involved in providing fundraising or campaign assistance or any other type of favour or assistance to a politician or their party or to a public official if the person or entity has any kind of dealings with the government or any interest in government decisions. If this restriction is not put in place, then essentially bribery and unethical trading of favours will continue to be legal under the *COIA*.

**Fourthly**, the most difficult area is private interests caused by relationships with family members, friends and past work associates who have financial, business or other personal interests, interests that are not in the control of the office holder. For these interests, the office holder should be required to disclose the relationship publicly and how it is affected by whichever decision-making process affects the private interests of the family member or friend or associate, and the office holder should be prohibited from participating in any discussion, decision-making process unless the private interest affected is shared in exactly the same way with a significant portion of Canadian citizens and/or businesses.

**Finally**, the Committee should clearly reject the Ethics Commissioner's very bad recommendation, on p. 9 of his report, that the "broad class" loophole in the *COIA* be expanded to "harmonize" with the larger loophole in ss. 3(3) of the [Conflict of Interest Code for Members of the House of Commons](#) (*MP Code*). Loopholes in the *COIA* need to be closed, not expanded.

#### **VIII. Many Other Ministers, Parliamentary Secretaries and Top Government Officials Have Not-Blind Trusts, Including Liberal Leslie Church Who Sits on the Ethics Committee**

As mentioned above, the federal [Conflict of Interest Act](#) (*COIA*) contains ethics requirements for the most powerful public office holders in the federal government – the Prime Minister, Cabinet ministers, their staff and all top government officials and Cabinet appointees (except ambassadors and federal judges) – almost 3,000 office holders in total.

However, the Committee's study focused almost solely on the ongoing significant financial conflicts of interest that Prime Minister Carney has, as set out above in Parts II, III, IV and V.

As shown in the [federal Public Registry](#) established under the *COIA*, several Cabinet Ministers have a "not-blind" trust.

- Rebecca Alty;
- Julie Dabrusin;
- Joel Lightbound;
- Jill McKnight;
- Eleanor Olszewski, and;
- Adam van Koeverden

As well, several Parliamentary Secretaries also have a "not-blind" trust:

- Leslie Church;
- Mona Fortier;
- Anthony Housefather;
- Patricia Lattanzio;
- James Maloney;
- Rob Oliphant, and;
- Taleeb Farouk Noormohamed.

In addition, several other top government officials also have a "not-blind" trust, including (but not limited to:

- Marc-André Blanchard;
- Jeremy Bruce;
- Martin Kolacz;
- Timothy Krupa;
- Caroline Lee;
- Olawale (Wale) Oyebanjo;
- Tom Pitfield;
- Michael Sabia;
- Manjeet Vinning

The Ethics Committee should have undertaken research, made information requests, and held hearings about these ministers, parliamentary secretaries and top government officials and others who have "not-blind" trusts to determine details about their trusts and conflicts of interest created by their investments.

And, given she has a blind trust that is covered by the *COIA*, and therefore had a personal interest that caused a conflict of interest, Liberal MP and Parliamentary Secretary Leslie Church should not have participated in the Ethics Committee's hearings on whether to change any of rules in the *COIA* or strengthen the enforcement system.

## **IX. Many Other Ministers, Parliamentary Secretaries and Top Government Officials Have Unethical Smokescreens, Including Liberal Leslie Church Who Sits on Ethics Committee**

As mentioned above, the *COIA*'s requirements cover almost 3,000 office holders in total, but the Committee's study almost solely focused on the ongoing significant financial conflicts of interest that Prime Minister Carney has, as set out above in Parts II, III, IV and V.

As shown in the [federal Public Registry](#) established under the *COIA*, several Cabinet Ministers and Parliamentary Secretaries have an unethical "smokescreen" ethics screen:

- Minister Dominic LeBlanc (re: J.D. Irving and his many businesses);
- Minister François-Philippe Champagne (re: his father's company Bionest Technologies and its subsidiaries etc.);
- Minister Anita Anand (re: her husband as exec at OMERS, and OMERS and some other related companies);
- Parliamentary Secretary Leslie Church (re: her relative at Counsel Public Affairs lobbying firm), and;
- Parliamentary Secretary Yvonne Jones (re: her husband's company Norzinc Inc.);

As well, several Cabinet minister staff have an unethical "smokescreen", among others:

- Adam Carroll; Alex Corbeil; Jason Easton; Viva Ebadi; David Frank-Savoie; Jan Gorski; Kimberly Luce; Hilary Martin; Joshua Mbandi; Beata Nawacki; Harrison Paul and Natalia Zhou – almost all of whom have conflicts because of ties to lobbyists and lobbying firms and/or companies that lobby the federal government.

In addition, several Cabinet appointees have an unethical "smokescreen", among others:

- Associate Deputy Minister Alex Banay; Chief of Defence Staff Jennie Carignan; Mark Fisher; Deputy Minister Christiane Fox; former Deputy Minister Annette Gibbons; Assoc. Deputy Minister Cliff Groen; former PCO Clerk John Hannaford; Secretary of the Treasury Board Bill Matthews; Export Development Canada President Alison Nankivell; Kathy C. Penney; Deputy Minister Arianne Reza, and; Assoc. Deputy Minister Mark Schaan.

The Ethics Committee should have undertaken research, requested information and held hearings about these ministers, parliamentary secretaries and top government officials and others who have an unethical smokescreen to determine whether they are actually being prevented from participating in discussions, decisions and votes (including on their cell phones and out of their office) when they have a conflict.

And, given she has an ethics screen that is covered by the *COIA*, and therefore had a personal interest that caused a conflict of interest, Liberal MP and Parliamentary Secretary Leslie Church should not have participated in the Ethics Committee's hearings on whether to change any of rules in the *COIA* or strengthen the enforcement system.