

TOWN OF RAINY RIVER - INTEGRITY COMMISSIONER REPORT

Concerning the March 2, 2026 Public Meeting

August 5, 2026

Robin L Dunn
Integrity Commissioner
Town of Rainy River

EXECUTIVE SUMMARY

Background

This Report concerns a Complaint submitted pursuant to Part V.1 of the *Municipal Act, 2001* alleging that Members of Council and the CAO/Clerk-Treasurer of the Town of Rainy River contravened the Town Council Code of Conduct.

The Complaint arose primarily from events that took place during a public meeting held on March 2, 2026 with members of the Town of Rainy River Council and the Respondent.

The meeting considered proposed amendments to the Town's Zoning By-law, including changes relating to minimum dwelling size requirements and land lease community housing.

During and following the meeting, concerns were raised regarding the manner in which public participation was managed, statements made during discussion, the conduct of Members and municipal staff, and the transition to a subsequent Committee of the Whole meeting.

The complaint alleged that this conduct failed to meet the standards of respectful conduct, honesty, integrity, transparency, and meeting conduct established by the Town's Code of Conduct.

Scope of Investigation

Following my November 10, 2025 appointment as Integrity Commissioner for the Town of Rainy River, on March 23, 2026 I was assigned a Code of Conduct Compliant and proceeded to conduct an independent inquiry into the complaint allegations.

The investigation was conducted pursuant to Part V.1 of the *Municipal Act, 2001* and the Town of Rainy River Council Code of Conduct.

The Integrity Commissioner's mandate was limited to determining whether the evidence established, on a balance of probabilities, that any Member of Council or municipal official contravened the Code of Conduct.

The investigation did not assess the merits of the proposed zoning amendments, determine whether planning interpretations advanced during the meeting were correct, or evaluate whether municipal governance practices reflected best practices, except where relevant to the complaint.

Investigation Process

The investigation included consideration of:

- the formal complaint and supporting submissions;
- responses provided by Deputy Mayor Prost, Councillor Hagarty, and CAO/Clerk-Treasurer Lavallee;
- municipal meeting minutes and related records;
- applicable legislation, municipal policies, and the Town's Code of Conduct; and
- additional information obtained through follow-up inquiries.

An evidentiary limitation arose because no official municipal audio or video recording of the March 2, 2026 meeting existed.

Findings were therefore based upon the documentary record, witness accounts, municipal records, and the overall reliability and consistency of the available evidence.

Issues Considered and Findings

The investigation addressed the following issues:

Issue	Finding
Public participation and management of the complainant's presentation	No Contravention Established
Statements regarding provincial planning requirements	No Contravention Established
Respectful conduct toward the complainant	No Contravention Established
Conclusion of the public meeting and transition to the Committee of the Whole meeting	No Contravention Established

Overall integrity, transparency, and public confidence

No Contravention
Established

Overall Determination

After considering the evidence as a whole, I find that the complaint has not been established on a balance of probabilities.

The evidence does not establish that any Member of Council or municipal official:

- improperly prevented the complainant from participating in the public meeting;
- knowingly provided false or misleading information;
- engaged in disrespectful conduct amounting to a breach of the Code of Conduct;
- improperly excluded members of the public from municipal proceedings; or
- otherwise acted contrary to the ethical obligations imposed by the Town's Council Code of Conduct.

Accordingly, the complaint is dismissed.

Governance Observations

Although no contraventions of the Code of Conduct were established, the investigation identified several opportunities to strengthen municipal governance practices.

Council may wish to consider:

- adopting clearer procedures governing public delegations and public participation;
- improving communication during transitions between consecutive municipal meetings;
- continuing education respecting respectful public engagement and meeting management;
- considering the benefits of official audio or video recordings of Council meetings; and
- periodically reviewing public communication and notice practices to enhance transparency and public awareness.

These observations are offered solely as governance recommendations and do not constitute findings of misconduct.

INTRODUCTION AND INVESTIGATION FRAMEWORK

1. Introduction

1. This report addresses a formal complaint alleging that Members of Council and the CAO/Clerk-Treasurer of the Town of Rainy River contravened the Town Council Code of Conduct during a public meeting held on March 2, 2026.
2. The meeting concerned proposed amendments to the Town's Zoning By-law relating to minimum dwelling size requirements and land lease community housing.
3. During and following the meeting, concerns were raised regarding the management of public participation, statements made during the discussion, the conduct of Members and municipal staff, and the conclusion of the public meeting before a subsequent Committee of the Whole meeting.
4. The purpose of this investigation is to determine whether the conduct identified in the complaint constituted a breach of the Town's Council Code of Conduct.

2. Mandate and Jurisdiction

5. The Integrity Commissioner is an independent statutory accountability officer appointed pursuant to Part V.1 of the *Municipal Act, 2001*.
6. The Commissioner's mandate includes investigating alleged contraventions of the municipal Code of Conduct, providing advice respecting ethical obligations, and reporting findings and recommendations to Council.
7. The Commissioner's role is limited to determining whether the conduct of Members of Council or municipal officials complied with the standards established by the Code of Conduct.
8. It is not the role of the Integrity Commissioner to review the merits of Council's policy decisions, determine the correctness of planning opinions, or assess whether municipal governance practices represent best practices except where those matters are relevant to an alleged breach of the Code.
9. Accordingly, this investigation does not determine:
 - whether the proposed zoning amendments were appropriate;
 - whether competing interpretations of planning legislation were correct;
 - whether municipal communication practices reflected best practices; or

- whether alternative meeting procedures would have been preferable.
10. Those matters fall within Council's governance responsibilities and are distinct from the question before the Integrity Commissioner.

3. Scope of Investigation

11. The investigation considered whether the evidence established that Members of Council or municipal officials:
- failed to treat a member of the public respectfully;
 - improperly managed public participation;
 - knowingly provided false or misleading information;
 - failed to uphold the standards of integrity, honesty, or transparency required by the Code of Conduct; or
 - otherwise engaged in conduct inconsistent with the ethical obligations imposed by the Code.
12. The central question throughout this report is:

Has the evidence established, on a balance of probabilities, that any Member of Council or municipal official contravened the Town of Rainy River Council Code of Conduct?

4. Standard of Proof

13. Integrity Commissioner investigations are administrative proceedings governed by the civil standard of proof.
14. Accordingly, findings are made on the balance of probabilities. A contravention may be found only where the evidence establishes that it is more likely than not that:
1. the alleged conduct occurred; and
 2. the conduct constituted a breach of the Code of Conduct.
15. A finding of misconduct cannot rest upon speculation, assumption, disagreement with Council's decisions, or dissatisfaction with municipal processes.
16. Where evidence is conflicting or incomplete, findings must be based upon the totality of the available evidence, assessed for reliability, consistency, and persuasive value.

5. Procedural Fairness

17. The investigation was conducted in accordance with the principles of procedural fairness, independence, and impartiality.
18. The complainant was afforded the opportunity to provide supporting information and clarification throughout the investigation.
19. Each individual whose conduct was identified in the complaint was advised of the allegations, provided with an opportunity to respond, and given the opportunity to submit information relevant to the issues under review.
20. The investigation was conducted without any presumption that either the allegations or the responses were accurate.
21. Findings are based solely upon the evidence obtained during the investigation and the applicable provisions of the Town's Council Code of Conduct.
22. The inquiry was conducted confidentially in accordance with the *Municipal Act, 2001* and the applicable procedures governing Integrity Commissioner investigations.
23. This report sets out the findings and reasons supporting the final determination.

BACKGROUND AND COMPLAINT

6. Background

The March 2, 2026 Public Meeting

24. This complaint arises from a statutory public meeting held by the Town of Rainy River on March 2, 2026 to receive public comments regarding proposed amendments to the Town's Zoning By-law.
25. The proposed amendments included changes respecting minimum dwelling size requirements and provisions relating to land lease community housing.
26. The purpose of the meeting was to receive public input before Council considered further action on the proposed amendments.
27. Notice of the meeting was provided through the Town's usual communication channels, including the municipal website, public bulletin boards, electronic notice boards, and the Town's Facebook page.

28. During the investigation, the complainant expressed the view that additional methods of notification should have been used to increase public awareness of the meeting.
29. As explained later in this report, the adequacy of the Town's notice practices is not determinative of the issues before the Integrity Commissioner and is addressed only as a governance consideration.

Attendance and Proceedings

30. The meeting commenced at approximately 5:00 p.m. and was chaired by Deputy Mayor Prost. Councillors Hagarty, Newman, Armstrong, and Helgeson (attending virtually) were present, together with CAO/Clerk-Treasurer Lavallee and members of the public, including the complainant.
31. The complainant addressed Council regarding the proposed zoning amendments.
32. Her presentation focused on public notification, minimum dwelling size requirements, land lease community housing, and the potential impact of the proposed amendments on the community.
33. The official minutes record that, following the presentation, "a brief discussion took place and Town Councillors were able to ask questions."
34. Following that discussion, Council directed that additional review be undertaken, including; obtaining further information from the Town's planning consultant, reviewing the Town's notice procedures, considering additional public notification methods, and scheduling a further public meeting before any final decision was made.
35. The public meeting adjourned at approximately 6:18 p.m.

Transition to the Committee of the Whole Meeting

36. A Committee of the Whole meeting had been scheduled to follow later that evening and commenced shortly after the public meeting concluded.
37. The complainant alleged that she understood she would be permitted to remain for the subsequent meeting and later believed that she and another resident had been required to leave.
38. The responding Members of Council and the CAO/Clerk-Treasurer consistently advised that the public meeting had concluded, that the Committee of the Whole

meeting was a separate proceeding, and that no direction was given requiring members of the public to leave.

39. The circumstances surrounding this transition, form one of the issues considered in this investigation.

7. Complaint

40. The complaint alleges that Members of Council and the CAO/Clerk-Treasurer failed to comply with the Town of Rainy River Council Code of Conduct during and immediately following the March 2, 2026 public meeting.
41. Although presented through numerous individual concerns, the allegations fall into five principal issues.

Issue 1 – Public Participation

42. The complainant alleges that Members of Council improperly interrupted her presentation, prevented her from completing her prepared remarks, failed to appropriately manage discussion during the meeting, and thereby restricted meaningful public participation.

Issue 2 – Accuracy of Information

43. The complainant alleges that Members of Council and municipal staff provided inaccurate or misleading information concerning provincial planning requirements relating to minimum dwelling size provisions and Council's authority respecting those matters.

Issue 3 – Respectful Conduct

44. The complainant alleges that comments made during the meeting were dismissive, disrespectful, or directed toward her personally rather than the issues under discussion, contrary to the standards of respectful conduct required by the Code.

Issue 4 – Conclusion of the Public Meeting

45. The complainant alleges that the public meeting concluded in an improper manner and that members of the public were excluded from participating in, or remaining for, the Committee of the Whole meeting that followed.

Issue 5 – Integrity, Transparency, and Public Confidence

46. Finally, the complainant submits that the cumulative effect of the events demonstrates conduct inconsistent with the principles of integrity, transparency, accountability, and public confidence reflected in the Town's Code of Conduct.

8. Matters Outside the Scope of the Investigation

47. During the investigation, the complainant raised several additional concerns that do not fall within the statutory mandate of an Integrity Commissioner.
48. These included concerns regarding:
- the adequacy of the Town's public notice practices;
 - the operation of the privately administered "Rainy River Classified" Facebook page; and
 - historical municipal billing matters.
49. To the extent these issues relate to municipal administration, policy, legislative compliance, or operational decision-making, they fall outside the jurisdiction of this investigation. No findings are made respecting those matters.
50. Where appropriate, broader governance observations arising from the investigation are addressed in the recommendations at the conclusion of this report.

INVESTIGATION PROCESS AND EVIDENTIARY RECORD

9. Investigation Process

51. The investigation was conducted pursuant to Part V.1 of the *Municipal Act, 2001* and the Town of Rainy River Council Code of Conduct.
52. Consistent with the principles of procedural fairness, each individual whose conduct was identified in the complaint was advised of the allegations and provided with an opportunity to respond before findings were made.
53. The investigation was conducted independently and without presuming the accuracy of either the complaint or the responses received.
54. The purpose of the investigation was to determine whether the available evidence established, on a balance of probabilities, that any Member of Council or municipal official engaged in conduct contrary to the Code of Conduct.

10. Evidence Considered

55. In reaching my findings, I considered the evidence as a whole, rather than any individual piece of evidence in isolation.
56. The evidentiary record included:
- the formal complaint and supporting submissions;
 - additional information provided by the complainant during the investigation;
 - written responses from Deputy Mayor Prost, Councillor Hagarty, and CAO/Clerk-Treasurer Lavallee;
 - the March 2, 2026 Public Meeting minutes;
 - the March 2, 2026 Committee of the Whole minutes;
 - the April 13, 2026 Public Meeting and Regular Council Meeting minutes;
 - applicable provisions of the Town's Council Code of Conduct;
 - relevant municipal policies and procedures; and
 - additional information obtained through follow-up inquiries.
57. The investigation considered both documentary evidence and the explanations provided by those directly involved in the events giving rise to the complaint.

11. Evidentiary Assessment

58. The investigation identified areas where the parties held materially different recollections of the March 2, 2026 meeting.
59. The complainant maintained that her presentation was repeatedly interrupted, that certain comments were disrespectful, and that the conclusion of the meeting resulted in her being excluded from further proceedings.
60. The responding Members of Council and the CAO/Clerk-Treasurer consistently described the meeting as one that evolved from a public presentation into a discussion involving questions and clarification.
61. They further maintained that the public meeting concluded in the ordinary course and that no member of the public was directed to leave.
62. Where evidence differed, I assessed the reliability of each account by considering:
- whether it was supported by contemporaneous municipal records;

- whether it was internally consistent;
- whether it was corroborated by other available evidence;
- whether it reflected direct knowledge of the events; and
- whether, viewed as a whole, the evidence established the alleged conduct on a balance of probabilities.

63. The purpose of this assessment was not to determine which participant held the more persuasive view of the underlying zoning issues, but whether the evidence established conduct constituting a breach of the Code of Conduct.

12. Evidentiary Limitation

64. An important limitation arose during the investigation concerning the availability of an official recording of the March 2, 2026 meeting.

65. Although the complainant believed that a recording existed, the investigation established that the Town does not maintain an official audio or video recording system for Council meetings, and had not created or retained an official recording of the meeting in question.

66. The recording notification observed during the virtual meeting appeared to relate to an artificial intelligence-enabled recording function associated with an individual participant rather than a municipal recording system.

67. Accordingly, no official recording was available for review.

68. The absence of an official recording limited the ability to independently verify matters such as the precise wording of individual comments, tone of voice, sequencing of exchanges, and the number or nature of interruptions.

69. However, the absence of a recording does not prevent an Integrity Commissioner from making findings.

70. Administrative investigations frequently require findings to be made on incomplete or conflicting evidence.

71. Accordingly, the investigation proceeded on the basis of the available documentary record, the responses received, contemporaneous municipal records, and the overall reliability and consistency of the evidence.

13. Approach to the Analysis

72. Each allegation is considered using the same analytical framework.
73. For every issue, I determine:
 1. the conduct alleged;
 2. the evidence relevant to that allegation;
 3. whether the alleged conduct has been established on a balance of probabilities; and
 4. if established, whether that conduct constitutes a contravention of the Town of Rainy River Council Code of Conduct.
74. The analysis distinguishes between conduct that may reflect disagreement, misunderstanding, ineffective communication, or procedural shortcomings and conduct that constitutes misconduct under the Code of Conduct.
75. The fact that a meeting could have been managed differently, or that participants experienced the meeting differently, does not by itself establish a breach of the Code.
76. Findings are based upon the evidence and the standards established by the Code of Conduct.

ISSUE 1 – PUBLIC PARTICIPATION AND MANAGEMENT OF THE COMPLAINANT'S PRESENTATION

Allegation

77. The complainant alleges that Members of Council improperly interrupted her presentation, prevented her from completing her prepared remarks, failed to appropriately manage discussion during the meeting, and thereby restricted meaningful public participation.

Relevant Code Provisions

78. The complaint engages the provisions of the Town's Council Code of Conduct requiring Members of Council to conduct themselves with integrity, fairness, respect, and professionalism when carrying out their public duties.
79. The Code does not prescribe how Council must conduct public meetings or regulate every aspect of meeting procedure.

80. Accordingly, the issue is not whether the meeting could have been managed differently, but whether the conduct of Members or municipal officials amounted to a breach of the ethical standards established by the Code.

Evidence

81. The complainant submits that she was repeatedly interrupted during her presentation, prevented from completing her prepared remarks, and discouraged from fully presenting her concerns respecting the proposed zoning amendments.
82. She further maintains that discussion by Members of Council diverted attention from her presentation and undermined the purpose of the public meeting.
83. The responding Members of Council and the CAO/Clerk-Treasurer describe the meeting differently.
84. They advise that the complainant was provided an opportunity to address Council, that Members asked questions as the discussion evolved, and that the exchange reflected a public meeting in which clarification and dialogue formed part of Council's consideration of the proposed amendments.
85. The official minutes record that, following the complainant's presentation, a discussion occurred during which Members of Council asked questions.
86. The minutes further record that Council directed additional review of the proposed amendments, including consultation with the Town's planning consultant, consideration of enhanced public notification, and the scheduling of a further public meeting before any final decision was made.
87. As discussed earlier in this report, no official audio or video recording of the meeting was available.
88. Accordingly, findings regarding the precise sequence of exchanges, the frequency of interruptions, or the tone of individual comments must be based upon the documentary record and the consistency of the available evidence.

Analysis

89. The evidence establishes that the complainant was afforded an opportunity to address Council and present her concerns regarding the proposed zoning amendments.
90. It also establishes that Members of Council engaged with the presentation by asking questions and discussing matters raised during the meeting.
91. While the complainant viewed those exchanges as interruptions that limited her opportunity to present her concerns, the responding participants consistently described them as part of the ordinary discussion accompanying a statutory public meeting.
92. In the absence of an official recording, I am unable to determine with precision the number, timing, or manner of the exchanges described by the parties.
93. The contemporaneous municipal record confirms that discussion occurred but does not support a finding that the complainant was prevented from presenting her views or that Council intentionally curtailed public participation.
94. Significantly, the documentary evidence demonstrates that Council did not proceed immediately to a decision on the proposed zoning amendments.
95. Instead, Members directed additional review, requested further information from the Town's planning consultant, considered improvements to public notification, and scheduled a subsequent public meeting.
96. Those actions are consistent with Council having considered, rather than dismissed, the concerns presented.
97. The complainant's dissatisfaction with how the discussion unfolded is understandable.
98. Public meetings concerning planning matters often involve strongly held views, and participants may reasonably perceive questioning or debate as disruptive to their presentation.
99. However, that perception alone does not establish that Members acted contrary to the Code of Conduct.

100. The Code governs standards of ethical conduct; it does not require that every participant experience a meeting as orderly or satisfactory, nor does it prohibit Members from asking questions or engaging in discussion during a public meeting.
101. Having considered the evidence as a whole, I am not satisfied that the conduct described rises to the level of misconduct contemplated by the Code.

Finding

102. The evidence does not establish, on a balance of probabilities, that Members of Council or the CAO/Clerk-Treasurer improperly prevented the complainant from presenting her views or otherwise conducted the public meeting in a manner that contravened the Town's Council Code of Conduct.
103. Finding: No Contravention Established.

ISSUE 2 – STATEMENTS REGARDING PROVINCIAL PLANNING REQUIREMENTS

Allegation

104. The complainant alleges that Members of Council and municipal staff provided inaccurate or misleading information concerning provincial planning requirements relating to minimum dwelling size provisions and Council's authority respecting those matters.

Relevant Code Provisions

105. The complaint engages the provisions of the Town's Council Code of Conduct requiring Members of Council and municipal officials to act honestly, with integrity, and in a manner that maintains public confidence in municipal decision-making.
106. The issue before the Integrity Commissioner is not whether every statement made during the public meeting represented the only or the most accurate interpretation of provincial planning legislation.
107. Rather, the question is whether the evidence establishes that any Member of Council or municipal official knowingly or recklessly provided false or misleading information in circumstances constituting a breach of the Code.

Evidence

108. The complainant submits that statements made during the March 2, 2026 public meeting concerning minimum dwelling size requirements and the Town's authority

under the provincial planning framework were inaccurate and had the effect of misleading Council and members of the public.

109. The complainant further relies upon her own interpretation of the applicable planning legislation and related materials in support of that position.
110. The responding Members of Council and the CAO/Clerk-Treasurer maintain that the discussion reflected their understanding of the planning issues before Council at that time.
111. They deny intentionally providing inaccurate information and state that the discussion was undertaken in good faith while considering proposed amendments to the Town's Zoning By-law.
112. The documentary record confirms that, rather than adopting the proposed amendments immediately, Council directed that additional information be obtained from the Town's planning consultant and that further public consultation occur before the matter returned for consideration.

Analysis

113. Municipal decision-making frequently involves competing interpretations of legislation, planning policy, and professional advice.
114. Differences of opinion concerning those matters do not, without more, establish misconduct under a Code of Conduct.
115. The evidence before me does not establish that any Member of Council or municipal official knowingly provided information they believed to be false, nor does it establish that any statement was made with the intention of misleading Council or the public.
116. The documentary record instead demonstrates that Members recognized the need for additional information before reaching a decision.
117. Council directed further consultation with its planning consultant and scheduled an additional public meeting before considering the proposed amendments.
118. Those actions are inconsistent with an intention to rely upon information known to be inaccurate or misleading.

119. To the extent the complainant maintains that certain planning interpretations were incorrect, that issue falls outside the statutory jurisdiction of an Integrity Commissioner.
120. This investigation is not an appeal of planning advice, nor is it a forum for determining the correct interpretation of provincial planning legislation.
121. Even if reasonable persons might disagree regarding the interpretation of the planning framework discussed during the meeting, such disagreement does not establish a contravention of the Code.
122. A breach of the Code requires evidence that the conduct itself was dishonest, misleading, or otherwise inconsistent with the ethical obligations imposed upon Members of Council or municipal officials.
123. Having considered the evidence as a whole, I am not satisfied that the available evidence establishes such conduct on a balance of probabilities.

Finding

124. The evidence does not establish that any Member of Council or municipal official knowingly or recklessly provided false or misleading information during the March 2, 2026 public meeting, nor does it establish conduct contrary to the honesty and integrity provisions of the Town's Council Code of Conduct.
125. Finding: No Contravention Established.

ISSUE 3 – RESPECTFUL CONDUCT TOWARD THE COMPLAINANT

Allegation

126. The complainant alleges that comments made during the meeting were dismissive, disrespectful, or directed toward her personally rather than the issues under discussion, contrary to the standards of respectful conduct required by the Code.

Relevant Code Provisions

127. The complaint engages the provisions of the Town's Council Code of Conduct requiring Members of Council to treat members of the public, one another, and municipal staff with dignity, courtesy, and respect while carrying out their public responsibilities.

- 128. The purpose of these provisions is to promote respectful public discourse and maintain confidence in municipal governance.
- 129. They do not prohibit robust debate, questioning, or disagreement during Council proceedings, provided that such conduct remains consistent with the standards of professionalism and respect established by the Code.

Evidence

- 130. The complainant submits that comments made during the March 2, 2026 public meeting were dismissive, disrespectful, and directed toward her personally rather than the planning issues under discussion.
- 131. She further maintains that the cumulative effect of interruptions and comments created an environment in which she felt belittled and discouraged from participating fully in the meeting.
- 132. The responding Members of Council and the CAO/Clerk-Treasurer deny that any disrespectful or discourteous conduct occurred.
- 133. They describe the discussion as a respectful exchange of differing views concerning the proposed zoning amendments and maintain that all participants were treated appropriately throughout the meeting.
- 134. The documentary record confirms that discussion followed the complainant's presentation.
- 135. However, the official minutes do not record the specific wording, tone, or manner of the exchanges now in dispute.
- 136. As noted earlier in this report, no official audio or video recording of the meeting was available.
- 137. Consequently, the investigation cannot independently verify the precise language used, the tone of particular comments, or the sequence of exchanges described by the parties.

Analysis

- 138. The evidence establishes that the March 2, 2026 meeting involved discussion of issues that were important to both Council and members of the public.
- 139. It is evident from the complaint and the responses received that participants experienced those discussions differently.

140. The complainant genuinely believes that certain comments were dismissive and that the manner in which discussion unfolded conveyed a lack of respect for her views.
141. I accept that this was her perception of the meeting and that she found the experience frustrating.
142. However, the role of the Integrity Commissioner is not to determine how individual participants experienced the meeting.
143. The issue is whether the available evidence establishes, on a balance of probabilities, that Members of Council or municipal officials engaged in conduct that objectively contravened the standards of respectful conduct required by the Code.
144. In the absence of an official recording, I am unable to make reliable findings regarding the precise wording, tone, or context of the comments alleged to have been disrespectful.
145. The contemporaneous municipal record confirms that discussion occurred but does not corroborate allegations of personal attacks, abusive language, or conduct that would objectively demonstrate a failure to treat the complainant with dignity and respect.
146. Municipal meetings frequently involve vigorous discussion, competing viewpoints, and questioning of proposals advanced by members of the public.
147. Participants may reasonably perceive those exchanges differently.
148. While some interactions may be experienced as discourteous or frustrating, that perception alone is insufficient to establish a breach of the Code of Conduct.
149. To constitute misconduct under the Code, the evidence must establish conduct that objectively departs from the standards of respectful behaviour expected of Members of Council or municipal officials.
150. Having considered the evidence as a whole, I am not satisfied that this threshold has been met.
151. This conclusion should not be understood as minimizing the complainant's concerns.

152. Rather, it reflects the evidentiary limitations of the investigation and the distinction between conduct that may be perceived differently by participants and conduct that can be established, on the evidence, as a breach of the Code.

Finding

153. The evidence does not establish, on a balance of probabilities, that Members of Council or the CAO/Clerk-Treasurer engaged in disrespectful conduct contrary to the Town's Council Code of Conduct.
154. Finding: No Contravention Established.

ISSUE 4 – CONCLUSION OF THE PUBLIC MEETING AND TRANSITION TO THE COMMITTEE OF THE WHOLE MEETING

Allegation

155. The complainant alleges that the public meeting concluded in an improper manner and that members of the public were excluded from participating in, or remaining for, the Committee of the Whole meeting that followed.

Relevant Code Provisions

156. This allegation engages the provisions of the Town's Council Code of Conduct requiring Members of Council and municipal officials to act with integrity, fairness, and transparency in the conduct of municipal business.
157. The issue is not whether the conclusion of the March 2, 2026 meeting could have been communicated more clearly.
158. Rather, the question is whether the evidence establishes that Members of Council or municipal officials improperly excluded members of the public from municipal proceedings or otherwise acted contrary to the ethical standards established by the Code.

Evidence

159. The complainant submits that, following the conclusion of the statutory public meeting, she understood that she would be permitted to remain for the Committee of the Whole meeting scheduled to follow.

160. She states that she and another resident subsequently believed they were required to leave, giving rise to the perception that members of the public had been excluded from further municipal proceedings.
161. The responding Members of Council and the CAO/Clerk-Treasurer consistently deny that any direction was given requiring members of the public to leave.
162. They maintain that the statutory public meeting concluded in the ordinary course and that the Committee of the Whole meeting was a separate proceeding.
163. They further advise that no one was instructed to leave the municipal offices or prevented from attending any meeting that was open to the public.
164. The municipal minutes record the adjournment of the statutory public meeting and the commencement of the Committee of the Whole meeting.
165. They do not record any direction requiring members of the public to leave or any objection raised concerning public attendance.

Analysis

166. The evidence establishes that the statutory public meeting concluded before the Committee of the Whole meeting commenced.
167. It also establishes that there was uncertainty among some participants regarding the transition between the two meetings.
168. The complainant genuinely believed that she had been expected to leave following the public meeting.
169. I accept that this was her understanding of the events and that it contributed to her concerns regarding transparency and public participation.
170. However, the available evidence does not establish that Members of Council or municipal officials directed the complainant or any other member of the public to leave, nor does it establish that anyone was intentionally excluded from a meeting that was required to be open to the public.
171. The contemporaneous municipal record is consistent with the respondents' explanation that the statutory public meeting concluded in the ordinary course and that a separate Committee of the Whole meeting followed.

- 172. While the transition between the meetings may not have been communicated as clearly as it could have been, uncertainty or misunderstanding regarding meeting procedures does not, without more, establish misconduct under the Code.
- 173. This investigation therefore distinguishes between two separate issues.
- 174. The first is whether the transition between meetings could have been managed more effectively as a matter of municipal governance.
- 175. The second is whether the conduct of Members of Council or municipal officials amounted to an ethical breach under the Code.
- 176. The available evidence supports consideration of the first issue as a governance matter but does not establish the second.

Finding

- 177. The evidence does not establish, on a balance of probabilities, that Members of Council or the CAO/Clerk-Treasurer improperly excluded members of the public from municipal proceedings or otherwise acted contrary to the Town's Council Code of Conduct during the conclusion of the March 2, 2026 public meeting.
- 178. Finding: No Contravention Established.

ISSUE 5 – OVERALL INTEGRITY, TRANSPARENCY, ACCOUNTABILITY, AND PUBLIC CONFIDENCE

Allegation

- 179. The complainant submits that the cumulative effect of the events demonstrates conduct inconsistent with the principles of integrity, transparency, accountability, and public confidence reflected in the Town's Code of Conduct.

Relevant Code Provisions

- 180. The final allegation concerns the overarching principles reflected throughout the Town's Council Code of Conduct, including integrity, accountability, transparency, and the maintenance of public confidence in municipal government.
- 181. These principles inform the interpretation and application of the Code.

182. They do not create a separate standard of liability independent of the specific obligations imposed upon Members of Council and municipal officials.
183. Accordingly, a finding under this issue must be based upon conduct that is established on the evidence and found to constitute a contravention of the Code.

Evidence

184. The complainant submits that, when considered collectively, the events of March 2, 2026 demonstrate a pattern of conduct inconsistent with the ethical standards expected of Members of Council and municipal officials.
185. She maintains that the manner in which the meeting was conducted, the information discussed, the interactions between participants, and the conclusion of the meeting undermined public confidence in the fairness and transparency of municipal decision-making.
186. The respondents deny that characterization.
187. They maintain that the meeting reflected a good-faith discussion of a complex planning matter, that public participation was encouraged, and that Council responded to concerns by directing additional review and scheduling a further public meeting before considering the proposed zoning amendments.
188. The evidence relevant to this issue consists of the same evidentiary record considered throughout the preceding sections of this report.

Analysis

189. The preceding issues have been considered both individually and collectively.
190. The evidence establishes that the March 2, 2026 public meeting generated genuine disagreement concerning the proposed zoning amendments and that participants experienced the meeting differently.
191. It also establishes that some aspects of the meeting, particularly the transition to the subsequent Committee of the Whole meeting, could have been communicated more clearly and may properly give rise to governance recommendations.
192. However, the evidence does not establish that Members of Council or municipal officials acted dishonestly, intentionally misled the public, treated the complainant in a manner contrary to the standards of respectful conduct required by the Code, or improperly excluded members of the public from municipal proceedings.

193. Nor does the evidence establish that the cumulative effect of the conduct considered throughout this report amounts to a broader failure of integrity, accountability, or transparency.
194. The Code of Conduct is intended to promote ethical governance by establishing enforceable standards of conduct.
195. It is not a mechanism for resolving every disagreement concerning municipal decision-making or every concern regarding meeting administration.
196. To conclude otherwise would extend the Integrity Commissioner's jurisdiction beyond that contemplated by the *Municipal Act, 2001* and the Town's Code of Conduct.
197. I have nevertheless considered whether the events, viewed as a whole, reveal broader governance concerns warranting comment.
198. I conclude that they do.
199. In particular, the investigation highlights opportunities to improve communication regarding meeting procedures, enhance public understanding of meeting transitions, and consider practices that would assist in resolving future factual disputes, including the potential use of official meeting recordings.
200. Those observations are directed to improving municipal governance. They do not alter the findings reached under the Code of Conduct.

Finding

201. Having considered the evidence both individually and cumulatively, I find that the complaint has not established conduct contrary to the principles of integrity, accountability, transparency, or public confidence reflected in the Town's Council Code of Conduct.
202. The governance observations set out later in this report are intended to strengthen municipal practices and should not be interpreted as findings of misconduct.
203. Finding: No Contravention Established.

OVERALL DETERMINATION

204. Having carefully considered the complaint, the responses received, the documentary record, and the applicable provisions of the Town of Rainy River Council Code of Conduct, I find that the complaint has not been established on a balance of probabilities.
205. The evidence does not establish that any Member of Council or municipal official:
- improperly prevented the complainant from presenting her views during the March 2, 2026 public meeting;
 - knowingly or recklessly provided false or misleading information respecting the planning matters under consideration;
 - engaged in conduct that objectively contravened the standards of respectful behaviour required by the Code of Conduct;
 - improperly excluded members of the public from municipal proceedings; or
 - otherwise acted contrary to the principles of integrity, accountability, transparency, or professionalism established by the Code.
206. Each allegation has been considered independently and in light of the evidentiary record as a whole.

Consolidated Findings Summary

Issue	Allegation	Finding
Issue 1	Improper interference with complainant's public participation	No Contravention Established
Issue 2	Misleading or inaccurate statements regarding provincial planning requirements	No Contravention Established
Issue 3	Disrespectful or inappropriate comments toward complainant	No Contravention Established
Issue 4	Improper closure of public meeting	No Contravention Established
Issue 5	Conduct undermining integrity and public confidence	No Contravention Established

207. Although participants held differing recollections of certain events, particularly regarding the nature of discussion during the public meeting and the transition to the subsequent Committee of the Whole meeting, the available evidence does not establish the alleged misconduct on the balance of probabilities.
208. Accordingly, the complaint is dismissed.
209. Nothing in this determination should be interpreted as suggesting that every aspect of the meeting reflected optimal governance practice.
210. The investigation identified several opportunities to strengthen municipal procedures and public communication.
211. Those observations are addressed separately below and should not be interpreted as findings of misconduct.

GOVERNANCE OBSERVATIONS AND RECOMMENDATIONS

Purpose

212. The role of an Integrity Commissioner extends beyond determining whether a contravention of the Code of Conduct has occurred.
213. Investigations may also identify opportunities to strengthen governance practices, improve transparency, and reduce the likelihood of future disputes.
214. The observations that follow are offered for Council's consideration in that spirit.
215. They are not findings of misconduct and do not affect the determination that no contravention of the Code of Conduct has been established.

1. Public Participation Procedures

216. Council may wish to review its procedures governing statutory public meetings to ensure
217. that participants clearly understand:
- the purpose of the meeting;
 - when questions or discussion may occur;
 - how presentations will be managed; and
 - the process that will follow receipt of public comments.

218. Providing these expectations at the outset of public meetings may assist participants in understanding how Council intends to conduct the proceedings and may reduce the potential for misunderstandings.

2. Meeting Transitions

219. The investigation identified uncertainty regarding the conclusion of the statutory public meeting and the commencement of the subsequent Committee of the Whole meeting.
220. Council should consider adopting a consistent practice of clearly announcing:
- when one meeting has formally concluded;
 - whether a subsequent meeting is open to the public;
 - the purpose of that meeting; and
 - whether any change in seating or attendance is required.
221. Clear procedural announcements promote transparency and public confidence while reducing the potential for differing understandings of meeting procedures.

3. Official Meeting Recordings

222. The absence of an official audio or video recording limited the investigation's ability to independently verify certain factual disputes concerning the March 2, 2026 meeting.
223. While municipalities are not generally required to record Council meetings, Council may wish to consider whether maintaining an official recording would:
- improve transparency;
 - assist in resolving future factual disputes;
 - enhance public confidence in municipal proceedings; and
 - supplement, rather than replace, official meeting minutes.
224. This observation is offered solely as a governance consideration.

4. Public Communication

225. The investigation also suggests that Council may benefit from periodically reviewing its public communication practices respecting statutory meetings and significant planning matters.

226. Although the investigation makes no findings regarding the adequacy of the Town's public notice practices, broader communication through multiple platforms may enhance public awareness and encourage participation.

Concluding Observation

227. The purpose of these recommendations is to support continuous improvement in municipal governance.
228. Good governance does not require that every meeting proceed without disagreement or misunderstanding.
229. Rather, it requires that municipalities continually review their practices to promote transparency, accountability, and public confidence.
230. The recommendations above are offered in that spirit.

CLOSING REMARKS

231. The role of an Integrity Commissioner is to determine whether the evidence establishes a contravention of the municipal Code of Conduct.
232. It is not to resolve policy disagreements, determine the correctness of planning decisions, or assess every aspect of municipal administration.
233. After considering the evidence as a whole, I am satisfied that the complaint has not established conduct contrary to the Town of Rainy River Council Code of Conduct.
234. At the same time, this investigation has identified opportunities for Council to strengthen meeting procedures, public communication, and governance practices.
235. The recommendations contained in this report are intended to support those objectives and reflect the principle that municipalities benefit from continually reviewing and improving their governance processes.
236. Public participation is an essential component of municipal government.
237. Equally important is maintaining confidence that concerns raised by members of the public will be considered carefully, fairly, and objectively.
238. Although this investigation has not established misconduct under the Code of Conduct, I encourage Council to consider the governance observations set out in

this report as part of its ongoing commitment to effective and transparent local government.

This concludes my investigation.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'R. L. Dunn', with a stylized flourish extending to the right.

Robin L Dunn
Integrity Commissioner
Town of Rainy River

August 5, 2026