

Principles *Integrity*

Township of Ramara

Councillor David Snutch Conflict of Interest/Code Complaint

Recommendation Report

April 21, 2020

Introductory Comments

- [1] Principles *Integrity* was appointed the Integrity Commissioner for the Township of Ramara on May 28, 2018 by the adoption of By-law Number 2018.37. We are also privileged to serve as Integrity Commissioner for a number of other Ontario municipalities. The operating philosophy which guides us in our work with all of our client municipalities is this:

The perception that a community's elected representatives are operating with integrity is the glue which sustains local democracy. We live in a time when citizens are skeptical of their elected representatives at all levels. The overarching objective in appointing an integrity commissioner is to ensure the existence of robust and effective policies, procedures, and mechanisms that enhance the citizen's perception that their Council (and local boards) meet established ethical standards and where they do not, there exists a review mechanism that serves the public interest.

- [2] The Township of Ramara has as part of its ethical framework a Code of Conduct which is the policy touchstone underlying the assessments conducted in this report. It represents the standard of conduct against which all members of Council are to be measured when there is an allegation of breach of the ethical responsibilities established under the Code of Conduct. The review mechanism contemplated by the Code, one which is required in all Ontario municipalities, is an inquiry/complaints process administered by an integrity commissioner.
- [3] Members of Township Council are also governed by the provisions of the *Municipal Conflict of Interest Act*. Both the *Municipal Conflict of Interest Act* and the Code of Conduct are relevant to and form the framework for the matters reviewed in this report.
- [4] Integrity commissioners carry out a range of functions for municipalities (and their local boards). They assist in the development of the ethical framework, for example by suggesting content or commentary for codes of conduct. They conduct education and training for members of council and outreach for members of the community. One of the most important functions is the provision of advice and guidance to members to help sort out ethical grey areas or to confirm activities that support compliance. And finally, but not principally, they investigate allegations that a person has fallen short of compliance with the municipality's ethical framework and where appropriate they

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submit public reports on their findings, and make recommendations, including recommending sanctions, that council for the municipality may consider imposing in giving consideration to that report.

- [5] It is important that this broad range of functions be mentioned at the outset of this investigation report. Our goal, as stated in our operating philosophy, is to help members of the Township of Ramara community, indeed the broader municipal sector and the public, to appreciate that elected and appointed representatives generally carry out their functions with integrity. In cases where they do not, there is a proper process in place to fairly assess the facts and, if necessary, recommend appropriate sanctions. In every case, including this one, the highest objective is to make recommendations that serve the public interest, if there are recommendations to be made.
- [6] This being our function, as Integrity Commissioner we play an important role in the administration of justice, including with respect to the oversight given members of Councils and of local boards with respect to the avoidance of conflicts of interest.
- [7] As noted later in this report, prior to March 1, 2019 a person who believed a member had breached the *Municipal Conflict of Interest Act* (MCIA) would have been required to apply to the courts to seek the imposition of a penalty under that Act. As of March 1st, Integrity Commissioners have standing to make that application on behalf of the complainant.
- [8] While there may be circumstances where integrity commissioners will seek that a penalty be applied by the courts under the MCIA, we importantly have the jurisdiction to instead investigate such complaints as breaches of a municipal code of conduct. In doing so we balance the nature of the penalty that best serves the public interest (for example, only the courts can remove a member from office; both the courts and the integrity commissioner have the jurisdiction to address the suspension of a member's pay for up to three months¹).
- [9] The choice made by the integrity commissioner is an important one. In each case we are to decide whether the circumstances are such that it is in the public interest to incur the costs and complications of an application to the courts (and thus also burden an otherwise busy court system with another matter on the docket) or to apply administrative law principles in carrying out a review function under the code of conduct to determine whether a member has breached provisions with respect to the avoidance of conflicts.

¹ Generally speaking, the courts can impose the penalty whereas an integrity commissioner can recommend to council that the penalty be imposed.

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- [10] Our role differs from other ‘adjudicators’ whose responsibilities generally focus, to state it colloquially, on making findings of fact and fault. While that is a necessary component when allegations are made, it is not the only component.
- [11] Our operating philosophy dictates the format of this report. The tenets of procedural fairness require us to provide reasons for our conclusions and recommendations, and we have done that. Procedural fairness also requires us to conduct a process where parties can participate in the review and resolution of a complaint.
- [12] In this regard, we have assessed the information fairly, in an independent and neutral manner, and have provided an opportunity to the Respondent named in this Report to respond the allegations, and to review and provide comment on the preliminary findings.

The Complaint

- [13] On November 25, 2019, we received a Complaint filed against Councillor Snutch. The Complaint alleges that the Councillor had a conflict of interest contrary to the MCI Act when he participated in a report on Short -Term Rental Accommodation at a Council meeting held on August 26, 2019 contrary to the Code of Conduct.
- [14] During our investigation, a further Complaint was filed on February 28, 2020 with respect to Councillor Snutch continuing to participate with an alleged conflict of interest, when the By-law to License Short-Term Rental Accommodation came before Council on January 27, 2020 contrary to the Code of Conduct and the Municipal Conflict of Interest Act.

Process Followed for the Investigation

- [15] In conducting this investigation, Principles Integrity applied the principles of procedural fairness, guided in a general sense by the complaint procedure set out under the Code of Conduct.
- [16] This fair and balanced process included the following elements:
- Reviewing the initial Complaint to determine whether it is within scope and jurisdiction and in the public interest to pursue, including giving consideration to whether the Complaint should be restated or narrowed, where this better reflects the public interest
 - Notifying the Respondent of the Complaint and seeking his response
 - Reviewing the Municipal Conflict of Interest Act and the Code of Conduct
 - Reviewing the subsequent Complaint, notifying the Respondent and seeking his further response

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- Reviewing other relevant documentation, Council reports, and interviewing the complainant and relevant witnesses
- Providing the Respondent with our draft findings, giving him the additional opportunity to provide submissions, including by granting a one-month extension for providing submissions
- Reviewing the 36-page submission from the Respondent's legal counsel and giving those submissions careful consideration before finalizing our Recommendation Report

Analysis of Complaint:

Jurisdiction:

- [17] As noted above, under the legislative framework, the role of integrity commissioners was broadened to include the jurisdiction to review allegations of conflicts of interest under the MCIA.
- [18] The amendments provide electors with an accessible, cost-effective mechanism for reviewing members' actions, without the need to bring an application before the courts.
- [19] As noted above, an important feature of an integrity commissioner's investigation is ensuring procedural fairness to both the Respondent and the Complainant. It is important to recognize, however, that an investigation is not a trial. It is intended to provide a fair and balanced means to make reliable findings of fact, which can be provided to Council, along with any recommended sanctions.
- [20] Whereas the previous regime obligated courts to impose the harsh penalty of removing elected officials from office, should they be found in conflict of interest, under the revised regime, there are milder sanctions which can provide deterrence without ending a councillor's political career.
- [21] These legislative changes provide a broad, remedial, purposive approach and move away from the previous legalistic, technical and punitive approach. Taking a purposive, remedial approach is helpful in interpreting and applying the provisions of the Code.
- [22] The Ramara Code was passed almost a decade before the legislative changes of 2019. Some of its provisions have been superseded by the recent amendments.
- [23] For example, Section 25.3(b) of the Code appears to exclude the Integrity Commissioner from participation in the administration of *Municipal Conflict of Interest Act* complaints.

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[24] This has been superceded by the Municipal Act, Section 223.4.1 which authorizes an Integrity Commissioner to conduct an inquiry into alleged contraventions of the MCIA.

[25] Council has clarified the role through the by-law appointing the Integrity Commissioner:

That upon appointment Principles Integrity will have all the functions, powers and duties of an integrity commissioner as set out in Part V.1, Accountability and Transparency, of the Municipal Act, and in addition such functions, powers and duties as may be assigned by Council from time to time.

Timing:

[26] Section 24, Compliance with the Code of Conduct, contains a provision regarding timelines: section 24.5 provides a deadline:

“Complaints must be submitted within six weeks of the matter becoming known to the organization or individual and no more than six months after the alleged violation occurring. No action will be taken on a complaint received beyond these deadlines.”

[27] Section 25 of the Code sets out the Complaints Procedure.

[28] Section 25.1, Informal Complaints, encourages complainants to address their concerns directly with the member following suggested steps, concluding with the provision that “if not satisfied with the response received through the informal process, a complainant may proceed with a formal complaint through the Integrity Commissioner as outlined in section 25.2.

[29] The Complainant raised the concern with the Respondent right at the public meeting which gave rise to the concern. Invoking the informal complaint procedure in this manner is sufficient to meet the 6 week deadline.

[30] The predominant purpose for such timelines is to avoid prejudice (to the Respondent) and to provide certainty and finality.

[31] Stricter interpretations of the 6-week window would negate the opportunity, encouraged by section 25.1, for attempts at informal resolution.

[32] The Respondent, having been immediately engaged in the Informal Complaint process, was not prejudiced by the processing of the Formal Complaint only three months into the six month limit set by section 24.5.

[33] Nevertheless, if any question existed around our jurisdiction to investigate the Complaint filed in November, 2019, that is resolved by the submission of the further

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Complaint, alleging the Respondent continued to participate while in conflict of interest, at a subsequent Council meeting in January 2020.

Background and Facts:

- [34] The Township of Ramara has experienced issues arising from short-term rental accommodation. The issue is not unique to Ramara.
- [35] Recent technological changes enable property owners to advertise their properties through AirBnB and VRBO generating frequent-turnover short-term occupancies, with minimal or no personal interaction between the property owner and the occupants.
- [36] Throughout small rural waterfront communities such as Ramara, local permanent residents have experienced noise and disturbance issue caused by occupants of short-term rentals partying for the duration of their short stay. Town Councils across these regions have struggled to find solutions to address these concerns.
- [37] There is always a balance to be struck between a laissez-faire, live-and-let-live approach which defers to property owners the obligation to supervise (and accept responsibility for) activities of their guests, and a more regulatory approach which relegates noisier, more intensive “resort-type” uses (which may generate larger numbers of people, partying and loud music into the night).
- [38] The confluence of technology and property values has lent itself to waterfront communities experiencing an influx of investors. This has tended to result in formerly family cottages/homes to evolve into vacation rental businesses.
- [39] In November 2016, following a presentation regarding the problems experienced by over 550 petitioners, caused by guests of short term rentals, Ramara Council established a Short-Term Rental Ad Hoc Committee. The committee was mandated to investigate and recommend ways to regulate short term rentals and report back to Council.
- [40] On August 26, 2019, following lengthy review and consultation throughout 2017 and 2018, the report recommending implementation of a Licensing By-law was provided to Council.
- [41] On August 26, 2019 at the Council meeting, Council had before it a report recommending implementing of the By-law Licensing Short-Term Rental Accommodation.
- [42] At that meeting, the Complainant who was in attendance, spoke publicly to draw to the Respondent’s attention that he had a conflict of interest in dealing with the issue

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of short term rental properties, as the owner of a short term rental property on Island View Drive in Ramara.

- [43] The Respondent denied that he is in a conflict of interest. He explained that the property that he rented out was purchased for use by family and that he only rented it out when not in use by them.
- [44] The Respondent proceeded to participate in the discussion and vote on the matter to proceed with licensing short term rentals.

Respondent Owns Property used as Short-Term Rental

- [45] The Respondent has confirmed that he owns a property on Island View Street, which is listed with AirBnB as a short term rental.
- [46] The issue is, therefore, as an owner of a short-term rental property in the municipality, can the Respondent participate in any manner in the decisions around regulation of short-term rental, or does this give rise to a conflict of interest?

Conflicts of Interest

- [47] The *Municipal Conflict of Interest Act* (MCIA) applies with respect to the pecuniary interests (direct, indirect and deemed) held by Members of Council. Under section 5 of the MICA, when a member has any pecuniary interest in any matter which is the subject of consideration by Council, the member
- shall disclose the interest and the general nature of the interest,
 - shall not take part in the discussion or vote, and
 - shall not attempt in any way whether before, during or after the meeting to influence the voting on any such question
- [48] This provision has been strictly interpreted in the caselaw.
- [49] We note that the Township's Code of Conduct provides, as well, that Members are to "avoid improper use of influence of their office, and conflicts of interest, both apparent and real", and very specifically in 5.13 (d), that Members "must avoid conflict of interest".
- [50] There are very specific exceptions in the MCIA which allow a Member of Council to participate and vote, despite having an interest in the matter. These are narrowly defined to include things like voting on the utility rates, voting on salaries for members of Council (otherwise, it would be impossible for Council to make the decision for every member would be 'conflicted') and voting on honorariums for volunteer fire fighters where the member is a volunteer fire fighter.

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- [51] There is also a category of exception which allows the member to participate and vote where it is a matter which constitutes “an interest in common with other electors generally”. This has been an exception which sometimes gives rise to confusion.
- [52] The caselaw has generally interpreted this exception to apply where the member is impacted **in an identical manner** as other electors generally...either the entire municipality, or a large class of people within the municipality. So for example, where a councillor claimed that his interest in a council decision to grant retailers an exemption under the *Retail Business Holidays Act* was an interest in common with all other businesspeople and retailers in the city, the court held that it was **not an interest in common**. Rather, the court held that every retailer had his own interest, and that interest is different from other ratepayers in the community.²
- [53] Certainly, one of the factors that mitigates against a member being able to shelter under the “interest in common” exception is whether the matter to be decided involves the making of a choice between alternatives that have a differential impact on the pecuniary interest of the member. Simply put, is there a pecuniary impact on the member of choosing one alternative over another?
- [54] When Council undertook a review to remedy the issue created by short term rentals, the Respondent was not yet a member of Council. His participation in such review, as an interested citizen and owner of a property listed with AirBnB was perfectly appropriate.
- [55] Once elected, however, the Respondent became subject to the MCIA.
- [56] Any regulatory scheme which would impact the operation of short term rentals in Ramara would, by necessity, have an impact on the Respondent. The Respondent thus had a conflict of interest in participating in, voting on, and attempting to influence the outcome of any discussion regarding regulating short term rentals.
- [57] We find that the Respondent had a conflict of interest in dealing with short term rentals which he failed to disclose, and in fact denied when confronted publicly.

² Kizell v. Bristol, [1993] O.J. No.3368 and O.J. No. 3369 (O.C.G.D.)... Two Councillors, one a full time employee of a retailer and the other operating a flea market, included themselves in a debate on a bylaw granting extended shopping hours during holiday periods. The bylaw was overturned on a conflict, the Court holding that the factors present are such that it cannot be said that “ they are so remote or insignificant that they cannot reasonably be regarded likely to influence the member. ” The Councillors were held to be in conflict due to the direct interest or “ a monetary stake in holiday shopping ” despite the obvious fact that the two councillors would not exclusively enjoy that benefit.

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- [58] The August 26, 2019 Council decision was a direction to staff to implement a licensing scheme to regulate short term rentals. The staff report of August 26, 2019 contained a matrix of criteria to be used in the by-law.
- [59] In fact, as was noted during the investigation, the Respondent failed to recuse himself, and participated in the discussion of the short term rental issue the first time the matter was before Council following his election, on February 11, 2019 when Council enacted an Interim Control By-law to prohibit any new short term rental properties from being established pending implementation of a regulatory scheme to control them.
- [60] At the February 11, 2019 meeting, following the debate, the Respondent publicly declared that he would not vote on the matter (having engaged in the debate). The Mayor explained to the Respondent that his abstention would be counted as a 'no' vote against the Interim Control By-law.
- [61] On January 24, 2020 a draft of the proposed Short-Term Rental Licensing By-law was circulated to members of the Short Term Rental Ad Hoc Committee and Members of Council, for final comment before being recommended to Council.
- [62] The Respondent forwarded comments directly to the CAO regarding the draft By-law.
- [63] On January 27, 2020, Council enacted the Short-Term Rental Accommodation By-law. The Respondent did not disclose an interest in the matter, and proceeded to vote on the By-law.
- [64] The Respondent rationalizes his participation, denying that his occasional rental of a secondary cottage puts him in a conflict of interest, and justifying that he has been working to solve the problem since his election and knows what the solutions should be. He notes that the By-law passed unanimously on a 6-0 vote (one member being absent for the vote), presumably demonstrating that his input and vote were not necessary, or instrumental in passage of the By-law.
- [65] Certainly, outcome of a vote is not the test – or even relevant – for determining whether a conflict of interest exists.
- [66] The public interest demands assurance that a Council member's decisions are made with the public interest and that there is no possibility the decision is influenced by the member's own private interest. For this reason, the rules are strictly interpreted to preclude members of Council from participating or attempting to influence a decision when any pecuniary interest exists.
- [67] It must be recognized that the fundamental issues under consideration in the review of short-term rental licensing, and ultimate enactment of the By-law, include whether to license, whether to restrict short-term rentals to principal or primary residences, whether to restrict the number of occupants, and what fees to impose.

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- [68] The fundamental decision-points in addressing short-term rental uses engage the member's personal interests, setting up potentially competing interests for the member between the public interest and his own personal interests.
- [69] The failure to recognize a pecuniary interest is sometimes understandable when it is a deemed interest (that is, an interest of a close family member which is attributed to the member by the rules), or an indirect interest (that is, an interest attributed to a member because it is his business partner's interest). For this reason we always encourage members of council to obtain the advice of the Integrity Commissioner when they see they have some particular and unique relationship regarding a matter before Council for consideration. It is best to err on the side of caution, obtain the advice, and be able to avoid a concern arising afterward.
- [70] The failure to acknowledge a pecuniary interest when it is clear and present and obvious should not be excused. Infractions should not be condoned, particularly when the member has had the rules around conflicts of interest thoroughly explained in the course of a previous investigation of a prior complaint of conflict of interest.

Guidance Sought on Recognizing 'Red Flags'

- [71] On July 19, 2019, the Respondent contacted Principles *Integrity* to discuss three separate circumstances which he felt others believed he was in a conflict of interest.
- [72] We often will have a phone conversation with a member seeking our advice to fully understand the facts and discuss our point of view before sending our written advice. As we explain, the legislation requires that the advice be in writing. When the advice is in writing, a Member may rely on the advice as a defence to a complaint.
- [73] Members of Council who seek the advice of the Integrity Commissioner are entitled to rely on their enquiries being kept confidential. There are, however, important exceptions to the requirement for confidentiality.
- [74] Section 223.6 (2) of the *Municipal Act* provides, that:

If the Commissioner reports to the municipality or to a local board his or her opinion about whether a member of council or of the local board has contravened the applicable code of conduct, the Commissioner may disclose in the report such matters as in the Commissioner's opinion are necessary for the purposes of the report.

- [75] We find it necessary to report that in the course of seeking our advice, which included discussion on short term rentals, for each situation the Respondent described, we pointed out that, at first glance, it did appear to us that he had an interest that would

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result in a conflict were he to participate in the matter. We called these 'red flags'. We offered to provide him written advice, but having heard our initial view, he stated that he was not seeking our written advice since it did not support him to participate.

- [76] The Respondent appeared relieved when, in response to his question about potential sanctions that can be imposed by an Integrity Commissioner, we advised we could recommend suspension of pay for up to 90 days, although a court could remove him from office under the MCI A.
- [77] As noted above we typically do not make any reference to conversations with members. However, we have determined that it is relevant and necessary for Council to understand the sanction which we are recommending.
- [78] That conversation foreshadowed the very issue in the complaint and demonstrates disregard for his obligation to avoid conflicts of interest in choosing to decline written advice despite the conversation regarding recognizing 'red flags'.
- [79] Four days after that conversation, we received a lengthy complaint regarding one of the other situations, not involving short term rentals, where we had cautioned the Respondent. That complaint resulted in a Recommendation Report to Council on September 16, 2019.
- [80] In our September 2019 report, we did not recommend any sanctions, concluding that the Councillor failed to appreciate that a conflict of interest arose by virtue of his father being a property owner affected by the subject matter.
- [81] As we stated at paragraph 63 of that Report, "In the unique circumstances of this case, the Councillor believed he did not in fact have a conflict of interest, despite appearances to the contrary."
- [82] The circumstances of the conflict of interest regarding short term rentals is far more blatant, and far from unique.
- [83] In our view, the Respondent's disregard of his obligations under the legislation cannot be condoned.

No Application Will Be Made to Court By the Integrity Commissioner

- [84] Recent amendments to the MCI A which came into force March 1, 2019 enable an applicant to pursue a remedy by making application to the municipality's Integrity Commissioner.

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[85] The legislature has seen fit to provide citizens with a less costly and more expeditious remedy, by authorizing an Integrity Commissioner to respond to applications under the MCI A. It is through this mechanism that the complainant/applicant brought this allegation to our attention for review and investigation. The relevant provisions under the *Municipal Act* are as follows:

Inquiry by Commissioner re s.5, 5.1 or 5.2 of *Municipal Conflict of Interest Act*

223.4.1 (1) This section applies if the Commissioner conducts an inquiry under this Part in respect of an application under subsection (2).

(2) An elector, as defined in section 1 of the *MCI A*, or a person demonstrably acting in the public interest may apply in writing to the Commissioner for an inquiry to be carried out concerning an alleged contravention of section 5, 5.1 or 5.2 of that Act by a member of council or a member of a local board.

[86] The MCI A authorizes the Integrity Commissioner to bring an application before the court, whereby a judge may impose sanctions beyond those within the jurisdiction of the Integrity Commissioner to recommend. The relevant provisions of the MCI A are as follows:

223.4.1 (15) Upon completion of the inquiry, the Commissioner may, if he or she considers it appropriate, apply to a judge under section 8 of the *Municipal Conflict of Interest Act* for a determination as to whether the member has contravened section 5, 5.1 or 5.2 of that Act.

(16) The Commissioner shall advise the applicant if the Commissioner will not be making an application to a judge.

(17) After deciding whether or not to apply to a judge, the Commissioner shall publish written reasons for the decision.

[87] Under the *Municipal Act*, following an investigation of a contravention by a member of council, the sanctions which an Integrity Commissioner may recommend to Council are:

- A reprimand
- Suspension of remuneration paid to the member for up to 90 days

[88] Under the MCI A, following a determination of contravention of the MCI A by a member of council, the sanctions which a judge may impose are:

- A reprimand
- Suspension of remuneration paid to the member for up to 90 days
- Declaring the member's seat vacant
- Disqualifying the member from being a member for up to seven years

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- If personal financial gain has resulted, requiring the member to make restitution

- [89] As statutory officers carrying out an administration of justice function, we are charged with the responsibility to choose which route to follow. Are the circumstances such that court time and legal expense should be incurred to seek a remedy only the courts can impose? Or is it a case where the Integrity Commissioner should review the matter and if it is in the public interest to do so, make recommendations to Council for the imposition of a recommended monetary penalty of up to 90 days suspension of pay.
- [90] It is apparent that, unless removal from office is sought, it is generally not in the public interest for the Integrity Commissioner to pursue sanctions by way of application to a judge. In our view, the remedy of removal from office ought to be reserved for the most egregious of violators.
- [91] In the current circumstances, although we find that the member displayed a willful disregard for the rules, we are of the opinion that the situation does not warrant the further expense, delay and public burden of a court application.
- [92] Rather, it is our hope that the daylighting of the issue coupled with imposition of a monetary sanction will have the effect of making the member change his ways and recognize his conflicts of interest when they arise.
- [93] We note that it remains open to the Complainant to pursue an application to Court under s.8 of the MCIA, seeking removal of the Respondent from office. We do not support that course of action.

Findings

- [94] We make the following findings in support of our recommendation below.
- [95] We find that the Councillor did have a conflict of interest in dealing with the Short Term Rental report when it was before Council on August 26, 2019. We find that this breached the conflict of interest provisions of both the Code and the MCIA, and that it was not inadvertent.
- [96] We find that the Councillor did have a conflict of interest in the Short Term Rental Accommodation Licensing By-law, participating before and during the meeting, providing comments on the draft, and voting on it when it was before Council on January 27, 2020. We find that this contravened the conflict of interest provisions of both the Code and the MCIA, and that it was not inadvertent.

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Recommendation:

- [97] The integrity commissioner may recommend that certain sanctions be imposed when a complaint has been sustained. The purpose of a sanction is to reinforce Council's ethical framework. In other words, the rules must have 'teeth'. A monetary penalty, although not remedial, can serve as a deterrent.
- [98] A penalty is warranted to clearly send the message that the behaviour falls below the standard expected of the community's elected representatives.
- [99] Although this was a clear disregard for the rules, we are of the view that the further legal expense to the Township incurred by a court application under the MCI Act is not warranted.
- [100] Rather, taking a remedial approach, we recommend a 30-day suspension of pay.
- [101] We therefore recommend:
1. That Council formally receive this report, and that it be posted on the Township's 'Integrity Commissioner Reports' page on the Township website for public access;
 2. That Council pass the following resolution:
- That having been found to have breached the conflict of interest provisions of the Code of Conduct and the *Municipal Conflict of Interest Act*, the remuneration paid by the Township to Councillor Snutch be suspended for a period of thirty days commencing with his next pay period.
- [102] We wish to conclude by publicly thanking the parties and administrative staff, and all those who participated in our investigation. We express genuine appreciation for the sharing of time, knowledge and perspective by everyone concerned.

We will be available to introduce this report and answer any questions during the Council meeting at which this report is considered.