



Cunningham Swan

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CONFIDENTIAL

November 21, 2025

SENT BY EMAIL TO: rganussi@ramara.ca

Township of Ramara
c/o Rebecca Zanussi, Executive Assistant
2297 Hwy 12
P.O. Box 130
Brechtin, ON
L0K 1B0

Dear Council:

RE: Code of Conduct Complaint – Final Report – Councillor Sherri Bell
Our File No. 37629-30

Please be advised that our investigation under the Code of Conduct is now complete. We attach the final report herewith and the report should now be circulated to members of the Council.

This investigation is hereby closed.

Sincerely,

Cunningham, Swan, Carty, Little & Bonham LLP

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Dear Council:

**RE: Code of Conduct Complaint – Final Report – Councillor Sherri Bell
Our File No. 37629-30**

This public report of our investigation is being provided to Council in accordance with Section 223.6(1) of the *Municipal Act*. We note that Section 223.6(3) of the *Municipal Act* requires that Council make the report public. The Clerk should identify on the agenda for the next open session Council meeting that this report will be discussed. Staff should consider whether it is appropriate to place the full report on the agenda in advance of Council deciding how the report should otherwise be made public.

Should Council desire, the Integrity Commissioner is prepared to attend virtually at the open session meeting to present the report and answer any questions from Council.

At the meeting, Council must first receive the report for information. The only decision Council is afforded under the *Municipal Act* is to decide how the report will be made public, and whether to adopt any recommendations made by the Integrity Commissioner. Council does not have the authority to alter the findings of the report, only consider the recommendations.

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The Integrity Commissioner has included only the information in this report that is necessary to understand the findings. In making decisions about what information to include, the Integrity Commissioner is guided by the duties set out in the *Municipal Act*. Members of Council are also reminded that Council has assigned to the Integrity Commissioner the duty to conduct investigations in response to complaints under the Code of Conduct, and that the Integrity Commissioner is bound by the statutory framework to undertake a thorough process in an independent manner. The findings of this report represent the Integrity Commissioner's final decision in this matter.

Timeline of Investigation

The key dates and events during the course of this investigation are as follows:

- October 9, 2025, complaint submitted;
- October 20, 2025, Complaint package sent to Member;
- October 21, 2025, Member requests extension for response;
- November 13, 2025 response from Member received;

Complaint Overview

A Complaint was received on October 9, 2025. The Complaint alleged that Councillor Sherri Bell (the "Member") posted a video to Facebook on September 22, 2025.

The complaint alleges that in the Facebook video the Member:

- accused 3 male members of Council, named as Mayor Clarke, Deputy Mayor Bell and Councillor Snutch, as bullying her. The accusations of bullying related to the May 15, 2024 Council meeting.
- stated that Council lacks common sense or even a modicum of the ability to read their own materials – in reference to the decision to fund the Integrity Commissioner's decision to bring an application to the courts related to the finding that Councillor Bell breached the *Municipal Conflict of Interest Act*.
- accused Council of harassment, persecution and sanctions against her without findings.

Code of Conduct

The following provisions of the Code of Conduct are relevant to our findings in this investigation:

5.13 Members of Council:

- (a) may not impugn or malign a debate or decision or otherwise erode the authority of Council.

6.1 Members shall accurately and adequately communicate the decisions of Council and Local Boards such that respect for the decision and decision-making process is fostered.

20.1 Every member has the duty to treat members of the public, one another and staff appropriately and without abuse, bullying or intimidation. All members of Council shall ensure that their work environment is free from discrimination and harassment.

Investigation Process

In conducting the investigation, the Integrity Commissioner watched the September 22, 2025 Facebook video. The Member was provided with a summary of the complaint and was given an opportunity to respond in writing.

The Member made written submissions in response to the complaint, which were considered and formed part of the investigation.

In her written submissions, through her paralegal, the Member took issue with the fact that a summary of the complaint was submitted, rather than the full complaint form/affidavit. The Member argued that in the absence of a sworn affidavit, the Integrity Commissioner is without jurisdiction and the complaint is a nullity.

A sworn affidavit on the Township's complaint form was submitted by the complainant to commence the investigation. A summary was provided of the complaint, rather than a redacted version of the actual complaint form, in order to ensure that the identity of the complainant would not be disclosed. The *Municipal Act* directs that integrity commissioners preserve the secrecy of the investigative process, which we interpret to include the identity of the complainant. The identity of the complainant was not necessary to allow the Member to make full answer to the allegations, and as such was not disclosed. The Integrity Commissioner is satisfied that all necessary procedural requirements were observed.

The Member also argued (numbering as found in the submission):

“5. The complaint is wildly unparticularized no exact utterances are enunciated it is impossible [sic] what specifics lead to the complaint being lodged, the Respondent has a right to know with certainty what specific acts, words, or other conduct, gives rise to the complaint, the Respondent is denied this information.

6. There is no evidence to support the allegations no video is attached, no link is provided, it is impossible to determine what video if any is alleged to be breached, and at what point in the video these alleged breaches took place.

7. The Applicant has a duty to prove their allegations and has failed to do so.”

The Integrity Commissioner considered and rejected these arguments for the following reasons:

- the summary of the complaint set out clearly that the Member accused 3 members of Council of bullying in her video. This is a sufficient particular. The summary then set out the complainant's view of what happened at the May 2024 meeting where the alleged bullying occurred; the Member would understand from the summary that the complainant disagreed with her accusation of bullying, and why.
- while the Member is correct that no link to the Facebook video was included, the video was made by the Member and it is posted on her Facebook page. The Member was advised of the date of the video and as such she cannot complain that she is unable to adequately respond to what she said in her own video.
- the complainant does not have an onus to prove their complaint. The Integrity Commissioner engages in an investigation to assess what facts are proven on a balance of probabilities.

Findings

In this case, the September 22, 2025 video posted by the Member is not in dispute. Despite the Member arguing that they were unable to respond, the video speaks for itself.

The impetus for the September 22, 2025 Facebook video appears to be a previous report from the Integrity Commissioner where we found the Member breached the *Municipal Conflict of Interest Act* and Council's decision to budget for an application being brought by our office seeking a decision of the Superior Court under that Act. The Member characterized our previous findings and Council's decision to accept the report as "ludicrous" and said that, "Council lacks common sense or a modicum of the ability to read their own materials".

The Member accused 3 members of Council of bullying her at a May 2024 Council meeting. In addition, the Member accuses Council of harassment and persecution. The allegations of harassment and persecution by Council appear to be the Member's response to Council imposing sanctions on the Member for past conduct, as well as its adoption of recommendations made in the report of the Integrity Commissioner. The Member has characterized the Council sanctions as "sanctions without findings".

Our office was not involved in the May 2024 meeting or the subsequent sanctions imposed by Council. No complaint was submitted to our office by the Member accusing any member of Council of bullying. We are not aware of any legal challenge having been brought by the Member to the previous sanctions imposed by Council.

Analysis

The Member made a written response to the complaint. The Member, through their paralegal, did not dispute the contents of the video and only raised procedural concerns – dealt with above.

The accusation that 3 named members of Council engaged in bullying and aggression towards the Member at a May 2024 Council meeting are unsubstantiated. No complaint was brought before the Integrity Commissioner about this incident within the limitation period established in the Code of Conduct.

The publicly available Facebook video casts aspersions on the named members of Council. This is a breach of section 20.1. Unfounded allegations, raised in this public platform are a form of abuse, and given the context of the Member attempting to discredit the decision of Council related to an Integrity Commissioner report, can be considered an attempt to intimidate members of Council.

There are appropriate mechanisms to deal with allegations of bullying – public accusations are not part of the process. Leveling these allegations in a Facebook video leaves the named members of Council with no opportunity to defend themselves, unless they too want to take to the internet to give their version of events. It is not in the public interest for members of Council to publicly berate one another or make accusations against one another.

In addition, the Member cast aspersions on Council’s decision related to the previous Integrity Commissioner’s report, stating, “Council lacks common sense or a modicum of the ability to read their own materials”. Referring to the previous sanctions imposed by Council as “sanctions without findings” is a further attempt of the Member to disrespect Council and its decisions.

Sections 5.13 and 6.1 of the Code of Conduct state:

5.13 Members of Council:

(a) may not impugn or malign a debate or decision or otherwise erode the authority of Council.

6.1 Members shall accurately and adequately communicate the decisions of Council and Local Boards such that respect for the decision and decision-making process is fostered.

The Member’s statements recorded on September 22, 2025, malign decisions of Council and have the effect of eroding the authority of Council, contrary to section 5.13(a). The video further breaches section 6.1 as it does not accurately communicate Council’s decisions and has the deliberate effect of expressing disrespect for the decisions of Council – both related to the Integrity Commissioner’s report and Council’s acts taken in response, as well as the previous

sanctions imposed by Council on the Member (characterized derisively by the Member as “sanctions without findings”).

In making the finding that sections 5.13 and 6.1 of the Code of Conduct were breached, the Integrity Commissioner engaged in an analysis of the *Charter of Rights and Freedoms* to balance the Member’s freedom of expression rights against the objectives of the Code of Conduct. The Integrity Commissioner acknowledges that the Member is entitled to express her views about Council decisions. The Code of Conduct imposes limitations on that right that must be balanced against the Member’s right to express themselves.

The Code of Conduct provides, in the “Statements of Principle”, that the, “standards are intended to enhance public confidence that the Township of Ramara’s elected and appointed officials operate from a basis of integrity, justice and courtesy.” Section 6.1 states the purpose of that section as fostering, “respect for the decision and the decision-making process”.

The Integrity Commissioner finds that the obligation to be respectful of Council decisions does not impair substantially the ability of any member of Council to make comments about decisions and express themselves as to the substance of any decision. All the Code of Conduct requires is that a member not misrepresent, impugn or malign a decision. This standard is minimally impairing and allows any Councillor to comment on decisions and fully express themselves, and even disagree with a decision, provided they maintain respect for the decision and decision-making process.

The Member deliberately characterizes the sanctions against her in a manner that is intended to show a complete lack of respect for that decision. This encourages the public to in turn disrespect Council; which can easily lead to disrespect not just for that specific decision, but for Council processes generally and other decisions. On balance, the Integrity Commissioner is satisfied that the limits imposed by the Code of Conduct are proportionate and justifiable.

Recommendation

The Integrity Commissioner recommends that the Member’s remuneration be suspended for a period of 20 days for the breach of section 20.1 of the Code of Conduct.

The Integrity Commissioner recommends that the Member’s remuneration be suspended for a period of 20 days for the breach of sections 5.13 and 6.1 of the Code of Conduct.

Sincerely,

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