



ADR
C H A M B E R S

Integrity Commissioner Office
for the Town of Grimsby

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Town of Grimsby

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BENJAMIN DRORY

Investigator

Office of the Integrity Commissioner

September 20, 2021

SENT BY EMAIL TO:

Councillor Bothwell

And to:

Councillor Vaine

Cc: Sarah Kim, Town Clerk

**Re: Investigation Report
Complaint No. IC-13251-0321**

Dear Councillors:

This is a report respecting a Complaint ("Complaint") brought by Councillor Dorothy Bothwell ("Councillor Bothwell") against Councillor Randy Vaine ("Councillor Vaine") under the *Code of Conduct for Members for the Council of the Town of Grimsby and Local Boards of the Municipality* (the "*Code of Conduct*" or "*Code*"), pursuant to an Affidavit dated March 31, 2021.

Mr. Charles Harnick ("Mr. Harnick"), then the Integrity Commissioner for the Town of Grimsby (the "Town"), delegated certain of his powers and duties to Mr. Michael L. Maynard ("Mr. Maynard") on April 1, 2021, to inquire into, investigate, and prepare a report, subject to his review and approval, respecting the complaint described herein. Mr. Maynard was subsequently appointed as the Town's

Integrity Commissioner on April 19, 2021, and completed the bulk of the investigation in this matter, including interviewing both parties. On September 3, 2021, Mr. Maynard delegated to Mr. Benjamin Drory certain of his powers and duties, to prepare a report respecting the instant complaint, subject to his review and approval. What follows is said Report, jointly prepared by Mr. Maynard and Mr. Drory.

As part of the investigation, we reviewed:

- Councillor Bothwell's Request for Investigation Form/Affidavit, dated March 31, 2021, and supporting information;
- Councillor Vaine's formal response, dated May 9, 2021; and
- Councillor Bothwell's reply, dated May 24, 2021.

Mr. Maynard also interviewed both councillors separately by telephone.

The Parties' Positions

Complaint

Councillor Bothwell asserted that Councillor Vaine contravened section 4.1(i) of the *Code of Conduct*, and also referenced s. 12.1 *Code of Conduct*. She wrote as follows in her Affidavit, in part (further background for which is provided later in this Report):

The sections of the Code of Conduct being referenced are:

4. Conduct of Members

4.1 In all respects, Members shall:

(i) Refrain from making disparaging comments about another Member or unfounded accusations about the motives of another Member.

3. Definitions

3.1 (i) "harassment" or "harass" involves engaging in a course of behaviour, limited to any behaviour, conduct or comment by a Member that is directed at or comment or conduct, whether it occurs inside or outside the work environment, that is or ought to reasonably be known to be

unwelcome. It includes but it not is offensive to another person:

ii. which is reasonably perceived by the recipient as an intention to bully, embarrass, intimidate or ridicule the recipient;

12. Harassment

12.1 No Member shall harass any other Member, any staff, or any member of the public.

March 11-14, 2021 – Email Exchange with Councillor Vaine

The Clerk proposed tentative dates for upcoming Ward Boundary Review meetings. One of the dates (March 31) conflicted with a Grimsby Green (GG) Committee meeting, of which I am Acting Chair. I notified the Clerk of the conflict for information, cc'ing all Councillors.

Councillor Vaine responded to my email to the Clerk, with copies to all Members of Council, and directed that the GG meeting be rescheduled noting that the Ward Boundary meeting was “far more important”.

... I did not imply, or suggest to the Clerk, that the Ward Boundary meeting should be rescheduled.

Councillor Vaine’s response was rude and condescending. His response in-part stated:

“I am more than welcome to advise the Clerk of my position on your request just like any other member of council who will be impacted by not having the opportunity to deal with an important issue which I again created through my motion to have a review of our Council.”

...

Councillor Vaine took it upon himself to determine and state that the GG meeting should be rescheduled. This is not his decision alone to make and rests with the Clerk.

Councillor Vaine’s statement that “in my opinion, your response to me was quite arrogant and rude and trying to bully me” is threatening and follows a pattern of verbal and email comments that attempt to discredit and question my intentions.

Councillor Vaine has repeatedly called out other Councillors as “bullies” as noted in the July 20, 2020 Integrity Commissioner report excerpt below... Calling out other Councillors as “bullies”, whether in private communications or a public forum is a serious accusation. Needless to say, it is intimidating in the context of his emails and his claims are unsubstantiated.

Code of conduct Complaint (Councillor Vardy against Councillor Vaine)

Complaint Reference Number: IC-187-0320

At a closed session council meeting on January 21, 2020, a motion was brought to remove Councillor Freake from the Town of Grimsby Hydro Board. The motion was contentious and sparked heated debate. During the course of this debate, Councillor Vaine, in response to comments made by Councillor Vardy, yelled across the room, “You’re a bully – you’re the biggest bully on Council.”

[...]

Under the heading of “Conduct” in the members Code of Conduct:

“every member of Council has a duty to treat one another without abuse, bullying or intimidation. A member shall not use indecent, abusive or insulting words or expressions toward any other member.”

Accordingly, I find that Councillor Vaine breached the members’ Code of Conduct, given the comment he made at the January 21, 2020 closed Council meeting. The fact this occurred in a closed session is not a justification for this behavior. The Code of Conduct applies equally to closed session meetings as it does to meetings in open Council. I further find that such breach occurred as an error in judgment made in the heat of the moment with a timely apology having been made. Accordingly, I recommend that no penalty be imposed for the infraction.

Further, I would also not agree with Councillor Vaine where he states that he “has gone to great lengths to try to work with you and as I have stated before, I have nothing against you.” The past year and a half have been fraught with confrontations at Council, in email exchanges, and as evidenced by the two Integrity Commissioner complaints previously filed against me. Councillor Vaine’s statement, “... in my opinion you try to come across as better

than everyone else, you are not" directly violates the Code of Conduct and makes disparaging comments about me and my intentions.

This follows a pattern of behaviour and comments including his statements at the December 14, 2020 Committee of the Whole meeting in respect to Heritage Grimsby Advisory Committee that, "the Committee has a certain amount of self-importance". This statement denigrates all members of the Committee, including myself. It is important to note that the majority (4 out of 5) members of this Committee are women.

...

Councillor Vaine's statement, "Instead of assuming everything you say is important to everyone, like I advised recently try working with others as part of a team" is especially demeaning and disrespectful. This comment follows a pattern of disrespectful and demeaning comments in emails noted further below.

Councillor Vaine's statement, "By the way, Titles and Control do not define me, I have had many roles and positions in the past so please spare me with titles" is belittling. As evident in his signature block, he uses the title of Deputy Mayor and others to reinforce his position on Council. ...

February 16, 2021 – Email from Councillor Vaine

Councillor Vaine states, "sometimes I just find your ways of acting as being very underhanded...", maligns my integrity and makes accusations about my motives, contrary to the Code. Prefacing a comment with, "in my opinion", does not diminish the intent of the words.

June 22, 2020 – Email from Councillor Vaine and cc'd to Integrity ADR

... Considering the pattern of behaviour evidenced over the past two years, this was not an isolated incident.

Councillor Vaine states, "your arrogance and condescending attitude towards most people...", is unsubstantiated, disparaging and a personal attack.

Councillor Vaine's statement that "I can appreciate the fact that in real life your role as an assistant/secretary may not be challenging or lacks your desire to manage..." is demeaning and misogynistic.

Further, Councillor Vaine has stated:

“The Grimsby 5 is a name that we are proud to have because we know that we are the honest and truthful ones serving the town, the staff and residents equally and fairly, we don’t have to play deceitful games or make up fake issues or news to try and make ourselves look better”

This statement infers that the remaining four Councillors, specifically myself as the recipient of the email, play deceitful games and make up fake issues and news. This directly attacks my integrity and makes unfounded accusations concerning my motives. This pattern of personal attacks and challenges in emails is persistent and ongoing.

Concluding Remarks

It is difficult for me to present this complaint as it makes me again vulnerable to attack and the need to defend myself. ... However, I am now at a point where the ongoing misogynistic and demeaning attacks against me seem to reflect a pattern of behaviour that cannot be tolerated and ignored any further. As a woman in Council, in the minority, and just an “assistant/secretary”, I need to speak out that this behaviour is not at all acceptable. As such, I submit this matter in good faith for your consideration.

Councillor Bothwell attached supporting information to her Affidavit, highlights of which are noted below.

The email chain at the centre of this complaint was originally initiated by the Town Clerk, Sarah Kim, on March 9, 2021, cc’ing the nine Member of Council (including the Mayor) and Town CAO, titled “Ward Boundary and Council Structure Review PHASE 2”, which proceeded as follows:

From: Town Clerk
To: 9 Members of Council
Cc: Town CAO
Sent: March 9, 2021, 7:25 pm

Hello all,

I would like to confirm that we will be starting our PHASE 2 of the ward boundary and council structure review. I did want to send the dates in advance so you can mark your calendars. I will send notification if the dates change, but at this time it is as follows:

- Consultation period (online survey) will be between Monday March 22 – Monday April 19.
- 1st Phase 2 Public Meeting will be on **Wednesday March 31st 6:30 pm – 8:00 pm**
- 2nd Phase 2 Public Meeting will be on **Thursday April 15th 6:30 pm – 8:00 pm**
- We are targeting the Monday May 17th COTW/Council meeting for the Final Council Presentation.

From: Dorothy Bothwell
To: 8 Members of Council, Director of Parks/Recreation/Culture
Cc: Town CAO
Sent: March 10, 2021, 8:37 pm

Hi Sarah,
 Just to note, the March 31 public meeting date conflicts, again, with the Grimsby Green Committee's scheduled meeting (which was set at the March 2 meeting).

From: Randy Vaine
To: 8 Members of Council, Director of Parks/Recreation/Culture
Cc: Town CAO
Sent: March 10, 2021, 8:57 pm

We can reschedule the Green Committee, I think that the Ward Boundaries report is far more important and there is plenty of time to reschedule the Green Committee meeting.

From: Dorothy Bothwell
To: 8 Members of Council, Director of Parks/Recreation/Culture
Cc: Town CAO
Sent: March 10, 2021, 9:09 pm

Thank you Randy. As A/Chair of the Grimsby Green, I directed my email to the Clerk to advise.

From: Randy Vaine
To: 8 Members of Council, Director of Parks/Recreation/Culture
Cc: Town CAO
Sent: March 11, 2021, 6:42 pm
 Thank you Dorothy, but as A/Deputy Mayor, a fellow Councillor/Peer, as Co-

Founding and Co-Creator of the Green Committee, I am more than welcome to advise the clerk of my position on your request just like any other member of council who will be impacted by not having the opportunity to deal with an important issue which I again created through my motion to have a review of our Council.

In my opinion, your response to me was quite arrogant and rude and trying to bully me.

I have gone to great lengths to try to work with you and as I have stated before, I have nothing against you but in my opinion you try to come across as better than everyone else, you are not, you are part of a team of nine equals, Jeff has certain minor extra duties, that's it.

The Green Committee which (Director of Parks/Recreation/Culture) and I created was intended to be run by residents and get their input and Councillors were only to be Liasons [sic], nothing more. Instead of assuming that everything you say is important to everyone, like I advised recently try working with others as part of a team.

By the way, Titles and Control do not define me, I have had many roles and positions in the past so please spare me with titles.

Have a good night.

From: Dorothy Bothwell

To: 8 Members of Council, Director of Parks/Recreation/Culture

Cc: Town CAO

Sent: March 12, 2021, 12:22 pm

Randy

To be clear, I was advising the clerk as to a possible conflict with the GG meeting, which was not in the Town's Event Calendar (it has since been added), understanding that it would need to be changed as a result.

I was asked to act as Chair as both yourself and Councillor Sharpe were not willing to attend Chambers to Chair in person under COVID restrictions and you have recently vacated your position on GG, having not attended any of the meetings to date. I look forward to one of our community members on GG taking on the role of Chair as we look at holding nominations at the next meeting.

I did not ask the Clerk, or imply, that the Ward Boundary meeting should be

rescheduled.

Your inference, tone and personal attack against me in this email exchange is disrespectful and harassing and is not appropriate under our Council Code of Conduct:

4.1 (i) In all respects, members shall:

Refrain from making disparaging comments about another Member or unfounded accusations about the motives of another Member.

From: *Randy Vaine*

To: *8 Members of Council, Director of Parks/Recreation/Culture*

Cc: *Town CAO*

Sent: *March 14, 2021, 8:49 pm*

Dorothy,

Some of the signs that someone is acting in a bullying manner are things like challenging people with the same action they stated about you, making personal attacks and threatening without basis, hmmm.

The best defense to unsubstantiated comments is proving the truth. I have nothing personal against you but you seem to.

Have a good evening. I am done with this conversation, I have a life.

Councillor Bothwell provided additional email correspondence that occurred between her and Councillor Vaine unrelated to the March 2021 email chain.

On February 16, 2021, at 11:50 am, Councillor Vaine emailed Councillor Bothwell as follows:

Good morning Dorothy,

I have been meaning to send you this email for some time now.

I have wanted to tell you for a very long time that contrary to what you and others have said, I do not dislike or have any hard feelings against you.

In my opinion, sometimes I just find your ways of acting as being very underhanded and you sometimes seem to treat staff and other members of Council badly, which I feel borders on harassment.

Having said that I do admire your tenacity and your ability and willingness to read but you can't attack experts just because they don't say what you want them to say. I do feel that you can be an asset, I just think you misuse your abilities.

There are many times where I agree with you and your 3 friends but it is the way that you try to do things. Try being more inclusive and working together. Just a suggestion.

The previous year, a resident emailed Councillor Bothwell and two other Members of Council, along with a Transportation Engineering Technologist for the Town, on June 16, 2020, asking for action on alleged dangerous traffic issues on Woolverton Road. Councillor Bothwell replied, saying she would give the Transportation Engineering Technologist time to review the options and get back to them, and they would go from there.

The Acting Director of Public Works emailed Councillor Bothwell the next day, cc'ing the rest of Council and the CAO, saying that Public Works were receiving an influx of speed/traffic complaints, and would address them one-by-one as they came in, but they would have details on Councillor Bothwell's case the next week. He added "Just as a courtesy, please copy me on any email to our Technologists so I can make sure we can stay on top of things".

Councillor Vaine replied to the group, which led to the following chain:

From: Randy Vaine
To: Acting Director Public Works, Dorothy Bothwell
Cc: 7 Members of Council, Town CAO
Sent: June 19, 2020, 2:10 pm
Subject: Meeting on Woolverton Traffic Issues

Why are Town Councillors emailing Technologists???

I was under the impression that we as Councillors are supposed to email the CAO or Directors only and that it was requested that we NOT contact staff or contractors directly.

*We are NOT managers and this gives the appearance of Councillors interfering with day to day operations ... Again ...
 Our staff have enough to deal with right now due to Covid and are trying to meet very difficult Provincial rules for re-opening, they don't need us micromanaging.*

As far as speeding, it is rampant everywhere across the town and the province, including Winston Road and Livingston Road and North Service Road and Central Ave., and etc., etc.

From: Dorothy Bothwell
To: Randy Vaine, Acting Director Public Works
Cc: 7 Members of Council, Town CAO
Sent: June 19, 2020, 3:04 pm

Hi Councillor Vaine,

As you were not on the original email threads from the resident to PW, you may not be aware that the resident originally directed his inquiry to the Technologist who responded to all without cc'ing the Director. I just caught that on the follow up threads and have ensured that the Acting Director is apprised.

I do not feel your tone and personal attack is appropriate in this email and would appreciate an apology. I can share other instances of oversights where Councillors have corresponded directly with support staff if you are tracking this for some reason.

I am fully aware of the demands on staff and appreciate all their efforts at this difficult time to work with Council and residents to resolve so many emerging issues.

Councillor Vaine then removed the other recipients from the chain, and messaged Councillor Bothwell solely:

From: Randy Vaine
To: Dorothy Bothwell
Sent: June 20, 2020, 2:31 pm

Sorry, it was not intended to be taken personal.

From: Dorothy Bothwell
To: Randy Vaine
Sent: June 20, 2020, 2:31 pm

I do take this as a personal attack as it was directly in response to my email. It was circulated broadly to Council and staff and inferred some serious, unsubstantiated allegations.

I have been the recipient of a pattern of these types of aggressively worded emails from you in the past and I have chosen not to engage and respond. This email has publicly questioned my integrity and motives, as you have as well done verbally in Council meetings with respect to my Committee involvement and some of my motions. You have made public statements on Facebook, including name-calling, that are slanderous. This is unacceptable and against the Code of Conduct.

Considering your email statement was made publicly and your response to me was private, I do not feel this is a sincere apology. If your intention is to truly repair the working relationship, and move forward in the best interests of all of Council and the Town, an unconditional, open public apology would be a start.

From: Randy Vaine
To: Dorothy Bothwell
Sent: June 21, 2020, 3:54 pm

I will be brief. I am not going to debate with you on this or any other topic.

My opinions are as follow:

I have attempted to work with you since the first day that I met you yet you have always been rude, pompous, condescending and obnoxious to me no matter how hard I have tried. I have attempted to meet with you approximately a dozen times over the past 15 months but every time I asked to meet you for coffee you have always blown me off in a condescending manner.

After attempting so many times to meet with you to discuss my concerns not only with the way that you treat me and act towards me but also to discuss the way that you treat and act towards our own staff as well as to address your arrogance and condescending attitude toward most people which I find extremely offensive, I finally had no choice but to go to the Integrity Commissioner with a complaint against you in hopes that you would stop but you continue to attack people and attempt to humiliate people and then are very condescending and act superior to others.

As you know I have many complaints against you from staff and other people within the town, some written some verbal.

I can appreciate the fact that in real life your role as an assistant/secretary may not be challenging or lacks your desire to manage but you were elected as we all were to be a council member not a manager yet I receive constant complaints from staff that

you are attempting to micromanage them, this I find extremely irritating, offensive, inappropriate and unprofessional.

...

Furthermore as you may or may not be aware the idea to attempt to embarrass the Grimsby 5 as your websites calls us, by highlighting meetings not attended was developed at a Christmas party with certain council members present and I found it very interesting that you were the one that brought it forward. ...

PS. The Grimsby 5 is a name that we are proud to have because we know that we are the honest and truthful ones serving the town, the staff and residents equally and fairly, we don't have to play deceitful games or make up fake issues or news to try and make ourselves look better. We serve with Honesty, Integrity and Transparency...

Finally, if you and your friends are so easily offended by words of others then maybe you should reconsider whether politics is for you. Have a wonderful day.

Councillor Bothwell forwarded this exchange to the Office of the Integrity Commissioner on June 22, 2020, for Mr. Harnick's reference.

We reviewed Mr. Harnick's Investigation Report IC-187-0320 that Councillor Bothwell referred to; its relevant portions were as follows:

Introduction

Councillor Vardy has brought complaints of breach of the Code of Conduct against Councillors Vaine, Kadwell and Sharpe. ...

... I choose to deal with the actions of each Councillor separately. I see each complaint as independent and unrelated in terms of timing and the individuals involved.

Code of Conduct Complaint (Councillor Vardy against Councillor Vaine) Complaint Reference Number: IC-187-0320

At a closed session council meeting on January 21, 2020, a motion was brought to remove Councillor Freake from the Town of Grimsby Hydro Board. The motion was contentious and sparked heated debate. During the course of this debate, Councillor Vaine, in response to comments made by Councillor Vardy, yelled across

the room, “You’re a bully – you’re the biggest bully on Council.”

I have had the opportunity to speak at length with both councillors to clarify various issues related to the complaint.

Councillor Vaine agreed that he made the comment as alleged by Councillor Vardy. He advised that the Mayor did not ask him to withdraw his remarks. Quite possibly, if he had been asked to withdraw immediately, he may have done so and this complaint may not have been made.

Shortly after the comment was made, the Mayor did call for a recess to calm the situation. Following the recess, Councillor Vaine apologized to Councillor Vardy and apologized to the whole of Council for his remarks. He further apologized to Councillor Vardy by email following the meeting, even offering to meet her for coffee. Councillor Vardy acknowledges that the apologies were made by Councillor Vaine.

...

Under the heading of “Conduct” in the members Code of Conduct:

“every member of Council has a duty to treat one another without abuse, bullying or intimidation. A member shall not use indecent, abusive or insulting words or expressions toward any other member.”

Accordingly, I find that Councillor Vaine breached the members’ Code of Conduct, given the comment he made at the January 21, 2020 closed Council meeting. The fact this occurred in closed session is not a justification for this behavior. The Code of Conduct applies equally to closed session meetings as it does to meetings in open Council. I further find that such a breach occurred as a result of an error in judgment made in the heat of the moment with a timely apology having been made. Accordingly, I recommend that no penalty be imposed for the infraction.

Conclusion

...

This Council appears to be split on a five to four basis on all contentious issues it has faced, therefore, I can see how a Councillor in the minority may conclude that collusion is occurring, even if that conclusion only relates to a single episode of behavior. I am not prepared to come to this conclusion upon my review of the

incidents referred to in the complaint.

Councillor Bothwell also provided a screen capture of a Facebook post Councillor Vaine made on Councillor Dave Sharpe's "wall" on the evening of May 6, 2020, in which he stated:

Well said Dave Sharpe, it's nice to hear facts instead of the fake information made up by the Fake Four Group of Council Members.

Some people don't know any facts so they just believe whatever they read in the paper or whatever crisis the Fake Four have created this week.

Thank you for being transparent and open, the people who do their research know that we are going in the right direction, while the other 4 just keep creating Fake Crises to try and make themselves look good. I'm with you on this one.

Response

In his formal Response, Councillor Vaine stated that Councillor Bothwell's complaint was "ludicrous ... slanderous, libelous, vexatious, without merit, retaliatory, and an attempt at dirty politics". He felt that Councillor Bothwell was attempting to weaponize the complaint process to further her agenda.

He asserted that, except for the March 2021 email chain, everything else that Councillor Bothwell referred to was outside the 6-week period for filing complaints noted in the *Code of Conduct*, and accordingly he chose to only specifically respond to the March 2021 emails. However, he stated that Councillor Bothwell "cherry-picked" parts of articles to make him look badly.

With respect the March 9-14, 2021 emails, Councillor Vaine acknowledged that Councillor Bothwell started off by advising the Clerk that the Ward meeting conflicted with the Grimsby Green meeting, to which he replied as a fellow councillor that he felt that the Ward Boundaries meeting was far more important than the Green Grimsby meeting – merely a statement advising of his opinion. He felt it was more important as a Council that they address the ongoing Ward Boundary study, than a meeting for a committee that was on hold due to Covid-19.

Councillor Vaine stated that upon receiving Councillor Bothwell's email stating "as A/Chair of the Grimsby Green, I directed the Clerk to advise", he felt she was being rude and disrespectful based on his past dealings with her, which quite offended and upset him. He wrote that he was merely stating his position that the

Ward meeting was more important, and it wasn't meant to create a chance for Councillor Bothwell to attack him.

Councillor Vaine said he waited until the next day to respond, as he was quite angry about her response, and went on to say "in my opinion, your response to me was quite arrogant and rude and trying to bully me" – which based on past experiences he truly felt she was trying to do, (i.e., intimidate or bully him into not challenging her on the matter).

Councillor Vaine opined that he has gone to great lengths to try to work with Councillor Bothwell over the past two years, and in fact prior to the election he met with Councillor Bothwell (as they both live in the same ward) and he ran in a different ward, as Councillor Bothwell was concerned she wouldn't be elected if they ran against each other. He said that since being elected he has tried to speak to Councillor Bothwell many times about the way she deals with people (i.e., especially how she deals with Town staff members, many of whom have raised concerns about her actions towards them), but she has rebuffed his attempts, or completely ignored the things he has said to her. He said he has tried to get her to understand that councillors are not managers, but rather are like a Board of Directors, but Councillor Bothwell (among other councillors) have acted like councillors are managers, which has caused tremendous grief amongst Town staff. He gave an example that Councillor Bothwell has sent over 4,500 emails to staff since being elected (not including attachments, phone requests, or replies), which he felt was beyond excessive for a councillor.

Councillor Vaine described that in his closing response to Councillor Bothwell, he had intended to say "I have a **busy** life", but in his haste he left out the word 'busy'.

Councillor Vaine added that he found it offensive Councillor Bothwell would think he treated her differently from any of their male counterparts. He said he has always stated he'll treat a person respectfully in the beginning, but will alter his treatment of them based on how they act towards others. He said he has commented to Councillor Bothwell in the past that while she is "tenacious at reading," that doesn't make her an expert just because she reads legislation – she has to learn to listen and learn from the experts who speak to matters. He felt Councillor Bothwell was being retaliatory with her complaint, based on having three previous Integrity Commissioner complaints filed against her.

Councillor Vaine stated that all members of council treat each other the same, and while they have their issues and often disagree, they don't treat each other

differently due to gender, which he felt was a false and underhanded allegation. He added that Mr. Harnick once told another councillor “politics is like a bloodsport, never take things personally” – but he said it is difficult and unacceptable when one has to create misinformation to win.

Councillor Vaine noted that in Councillor Vardy’s previous complaint against him, Mr. Harnick only found him at fault because the Mayor failed to ask him to withdraw his comment (after failing to attempt stopping Councillor Vardy from continuing a verbal attack on Councillor Ritchie), even though he apologized to Councillor Vardy.

Councillor Vaine added the following:

For my whole adult life, I have always been protective and defended women from men who treat them improperly, mostly I have been active in helping women being abused to escape or deal with their abusive partners. I have been to court, to lawyer’s offices, to government offices and liaised with police to help these abused women. I have stood toe to toe with abusive partners. For a few years prior to meeting my current wife, I was extensively helping women on my own time, my own expense and my own efforts to help them escape their abusive relationships. ... I have always and will continue to support Homes for Abused Women and Children.

...

I have taught College level courses at Humber College to adult students, men and women, for a period of 6 years. I was always very respectful of all students irregardless of their gender, background and culture or any other differences. ...

I have worked in Canada Customs (CBSA – Canada Border Services Agency), for the past 31 years. During that period of time, I have dealt with men, women and children from all over the world from war torn areas, to people who are fleeing persecution due to gender or beliefs. I have always treated everyone with great compassion and understanding, as I stated above, we can never appreciate what somebody else has been through or experienced. ...

During my short time being employed as a Town Councillor at the Town of Grimsby, I have always worked hard to have a good personal relationship with all of the Town staff and at one time, most of the councillors actually got along as well. ... Prior to the arrival of our current CAO, I even had quite a few members of the town staff address me by first name, which I encouraged. (Note: the current CAO

has asked all staff to call Councillors by their title and not first names.)

...

On a personal note, I also am a current Board Member of a group focused on helping troubled and homeless youth, which is run mostly by female staff, a female Executive Director and a board made up mostly of female Directors and we all have a great deal of respect for each other.

...

In closing, it is very clear that Councillor Bothwell and I are on different sides of the political fence, but this type of Weaponized Political Attack is never okay.

Reply

Councillor Bothwell wrote in her Reply that she didn't have an "agenda" and was not "weaponizing" the Integrity Commissioner process as alleged – she said this matter was presented to address Councillor Vaine's persistent and demeaning personal attacks. She reiterated that her interactions with Councillor Vaine have been strained and uncomfortable, as she often feels his comments are intimidating and unwelcome. She added that Councillor Vaine's frequent and aggressive outbursts at Council are a pattern, as evidenced through his email exchanges. She said she conducts herself professionally at Council, and in discussion and debate with all councillors, with the desire to advance the community's needs and business as best she can.

She added that she has been employed by the federal government for over 20 years, and is currently a Branch Coordinator with supervisory responsibilities, with extensive training in human resources, occupational health and safety, labour relations, indigenous relations, and diversity/inclusivity, and had participated in bullying training offered by the Department of Fisheries and Oceans in 2018.

She felt that the remainder of Councillor Vaine's response was superfluous and posturing, in an effort to support his behaviours.

Interviews with Parties

Mr. Maynard interviewed both councillors by telephone, separately.

Interview with Councillor Bothwell

Councillor Bothwell described a mob mentality on Council, and said Councillor Vaine would attend various meetings she chaired and make observations about what happened in them, and then question her conduct there during Council meetings. She described being confronted on every decision (by several certain Members, but particularly Councillor Vaine), and Councillor Vaine's favorite statement is "you're weaponizing heritage". She said that Councillor Vaine's approach the past two years, including before becoming a councillor, has included angry outbursts where he says things that are hurtful, belittling, and demeaning, which he later apologizes for and retracts, but he also regularly says that other councillors are acting like bullies.

Councillor Bothwell described that the effect of this belittling discourse and emails are cumulative, and she feels persecuted and scrutinized on everything she does. She emphasized that it was important to look at his pattern of behaviour, and she found it difficult that Councillor Vaine would try to flip things around and accuse her of being a bully.

Interview with Councillor Vaine

Councillor Vaine said he wasn't the aggressor in the situation, and he was just trying to protect staff. He said Mr. Harnick had said politics is a bloodsport, but he joined politics to help, and during his campaign he just walked around asking what problems people had, taking notes of issues to help them with. He said he has told Councillor Bothwell to stop bullying behaviour in the past, because she treats staff poorly and has a bad reputation for being aggressive and harassing to people. He said three former Town employees, in their exit interviews, said they left because of Councillor Bothwell. He said Councillor Bothwell's go-to complaint is "I'm a woman". He noted the existing conflict on Council, and expressed the view that the group of four individuals on the other side of Council's apparent divide are very aggressive, whereas he always says: "we need to work together".

Councillor Vaine said he was most bothered by the misogyny suggestions, when he has a long history as a volunteer helping women. He added that even in spite of Council's dysfunction, others have told him that Council has been getting more done in the past two years than in the previous twenty.

With respect to the March 2021 email exchange, Councillor Vaine said he took Councillor Bothwell's comment (i.e., "as A/Chair...") as aggressive and rude, like she was trying to push him. He said he started the Grimsby Green group with the

Director of Parks, and created it in a way that councillors would only be liaisons, and not the Chair – but here Councillor Bothwell was the Chair. He said Chairs don't work on agendas – staff do – and he took her comment about the being the Chair like her “flipping her nose at him”, so he responded with a bit of bravado, that he didn't care about titles. He felt the whole thing came down to the history between him and Councillor Bothwell, and how she had tried imposing her will on people in the past. He said he doesn't deal with bullies, but his back automatically goes up when dealing with “the four” (i.e., Council Members, including Councillor Bothwell) because a lot of what they do is bullying.

Councillor Vaine described his February 16, 2021 email to Councillor Bothwell as an olive branch – he said he thought she knew he had a great deal of respect for her.

With respect to the June 2020 email exchange, Councillor Vaine said Councillor Bothwell is notorious for trying to direct staff, and the legal and planning budgets have gone way up because Councillor Bothwell wants extra opinions on everything. He said Councillor Bothwell is very passionate on heritage, and believes her way is the way things should be done. He described that she gets in her mind that she is right, and then plows forward and micromanages staff, who email and call him saying they feel attacked.

Councillor Vaine forwarded to our attention a series of emails between him and Councillor Bothwell from 2018, intended to indicate that at one point they got along cordially, but that they have only since become separated by political differences. Councillor Vaine said he is human and emails can be misinterpreted, but the situation isn't personal with him, and he prefers trying to sit down and have a coffee with someone. However, he said for everything he has tried with Councillor Bothwell (e.g., olive branches, suggestions to go for coffee), she always replies 'no'.

Councillor Vaine also provided a list of confidential witnesses who he indicated would:

... testify to the treatment and the fear that they have received or feel from Councillor Bothwell and they will confirm that I have and continue to stand up for them to protect them from some members of Council who would like to take control of the town including Councillor Bothwell, but they are in fear of retribution from Councillor Bothwell, so that is why they want Confidentiality.

Councillor Vaine saw himself as standing up for staff, and asserted that his

disposition towards Councillor Bothwell, as expressed in his various email communications forming the substance of this Complaint, related to what he viewed as Councillor Bothwell's mistreatment of staff.

Workplace Harassment Policy

On top of the harassment provision in the *Code of Conduct* (s. 12.1), it should be noted that Members of Council are also subject Town's Workplace Harassment Policy (CO-GEN-OHS-PRO-007-002 – the "Policy"), by virtue of s. 12.2 of the *Code of Conduct*, as well as the Policy's wording.

Section 12 of the *Code of Conduct* reads in its entirety:

12. Harassment

12.1 No Member shall harass any other Member, any staff, or any member of the public

12.2 A Member shall observe and comply with any workplace harassment and workplace violence policies of the Town.

Section 3(k) of the *Code of Conduct* defines "harassment" as follows:

(k) "harassment" or "harass" involves engaging in a course of behaviour, limited to any behaviour, conduct or comment by a member that is directed at or comment or conduct, whether it occurs inside or outside the work environment, that is or ought reasonably to be known to be unwelcome. It includes but is not is offensive to another person:¹

- i. on the grounds of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, age, handicap, sexual orientation, marital status, or family status, as well as any other grounds under the provisions of the Human Rights Code; or*
- ii. which is reasonably perceived by the recipient as an intention to bully, embarrass, intimidate, or ridicule the recipient;*

The Policy was last revised in January 2021; in its section 3, "Workplace Harassment" is defined as:

¹ The introductory paragraph in s. 3(k) is poorly presented in its current state. We recommend that Council amend this section at its earliest opportunity, in order to most accurately reflect its intention therein. Nonetheless, the likeliest intention of the existing wording can still be inferred, as is the Integrity Commissioner's duty when interpreting the *Code of Conduct*.

- *Engaging in a course of vexatious (i.e., annoying irritating, upsetting, etc.) comment or conduct against a worker in a workplace that is known or ought to be reasonably to be known to be unwelcome; or*
- *Workplace sexual harassment.*

Under s. 4 of the Policy, a complainant's responsibilities include clearly communicating to the harasser(s) that the harassing behaviour is unwanted, and keeping records of all pertinent information related to incidents of harassment or related complaints. All staff are responsible for refraining from behaviour contrary to the Policy and reporting behaviour that contravenes it. Under s. 5.3.4 of the Policy, the appropriate "investigating officer" for a case involving an elected official is an investigator external to the Town.

Members of Council are not technically employees of the Town – they are elected officials, and thus have different legal relationships with the Town than the Town's staff, who have employment relationships. Nonetheless, by virtue of sections 12.1 and 12.2 of the *Code of Conduct*, and the Policy, it is clear that Members of Council are intended to be subject to significant rules regarding harassment in their working environment.

We note that Councillor Bothwell did not advance section 12.2 of the *Code* as part of this Complaint, and we are accordingly not considering that section in our analysis and conclusions – i.e., we will not be making any finding under that section. However, we felt it was appropriate to include information about section 12.2 along with Town's Harassment Policy because the Policy defines what harassment is, and together (along with sections 3(k) and 12.1) they form part of the broader context for how harassment is understood and dealt with at the Town.

Analysis

We must first address Councillor Vaine's preliminary argument (i.e., that there is a six-week limitation period for initiating a *Code of Conduct* complaint, and parts of Councillor Bothwell's complaint were outside it.) Section 1(e) of the Formal Complaint Procedure² for initiating a complaint relating to the *Code of Conduct* reads as follows:

All requests must be submitted within six weeks of the complaint becoming aware of the alleged contravention, and no more than six months after the alleged violation.

² See page 17: https://www.grimsby.ca/en/town-hall/resources/Documents/B---Consolidated_Code-of-Conduct-for-the-Council-of-the-Town-of-Grimsby-and-Local-Boards-of-the-Municipality-002.pdf

Councillor Bothwell's complaint was submitted on March 31, 2021 – therefore, Councillor Vaine's argument is effectively that anything that occurred prior to February 17, 2021 (i.e., six weeks earlier) was irrelevant to the matter, and couldn't be considered. However, we posit that this misunderstands the nature of harassment, as prohibited.

The exact definition of "harassment" can change from workplace to workplace, but the general approach to it as a legal matter varies minimally. The definitions of harassment in s. 3(k) of the *Code of Conduct* and s. 3 of the Town's Policy have already been canvassed. A different example adds additional context. The federal government has published a webpage "Is It Harassment? A Tool to Guide Employees",³ which applies to federal government employees. While we acknowledge the difference in jurisdiction, we consider the similarities (which are predominant) to be more significant than the differences for present purposes. That webpage reads (emphases in original):

Definition of Harassment

...

... [H]arassment is normally a series of incidents but can be one severe incident which has a lasting impact on the individual.

*Essentially, the definition of harassment means that **more than one act or event is needed** in order to constitute harassment and that taken individually, this act or event need not constitute harassment. It is the repetition that generates the harassment. In other words, harassment consists of repeated and persistent behaviours towards an individual to torment, undermine, frustrate or provoke a reaction from that person. It is a behaviour that with persistence, pressures, frightens, intimidates or incapacitates another person. Each behaviour viewed individually may seem inoffensive; it is the synergy and repetitive characteristic of the behaviours that produce harmful effects.*

*However, **one single incident** can constitute harassment when it is demonstrated that it is **severe** and has a **significant and lasting impact** on the complainant.*

...

What criteria have to be met to establish whether there was harassment?

³ <https://www.canada.ca/en/government/publicservice/wellness-inclusion-diversity-public-service/harassment-conflict-resolution/harassment-tool-employees.html>

Harassment is serious. To substantiate harassment allegations, it must be demonstrated that, according to the balance of probability:

- *The respondent displayed an **improper and offensive conduct** including objectionable acts, comments or displays, or acts of intimidation or threats, or acts, comments or displays in relation to a prohibited ground of discrimination...*
- *The behaviour was **directed** at the complainant;*
- *The complainant was **offended or harmed**, including the feeling of being demeaned, belittled, personally humiliated or embarrassed, intimidated or threatened;*
- *The respondent **knew or reasonably ought to have known** that such behaviour would cause offence or harm;*
- *The behaviour occurred in the **workplace** or at any **location or any event related to work**...*
- *There was a **series of incidents or one severe incident** which had a lasting impact on the individual. ...*

*In order to make a finding of harassment, **each** of the above elements must be present. If even one of these elements cannot be proven, there will not likely be a finding of harassment.*

...

Examples of what constitutes harassment when repeated or one single severe event

- ...
- *Making rude, degrading or offensive remarks*
- ...
- *Discrediting the person by spreading malicious gossip or rumours, ridiculing him/her, humiliating him/her, calling into question his/her convictions or his/her private life, shouting abuse at him/her*
- ...

Accordingly, demonstrating a pattern of repeated behaviour over time is typically necessary to substantiate a complaint of harassment. Therefore, we do not agree with Councillor Vaine's submission that events and communications prior to February 17, 2021 are irrelevant to the analysis in this case – while such events would be time-barred from constituting *Code of Conduct* violations in and of themselves, they are nevertheless relevant, probative evidence that could

demonstrate Councillor Vaine directed a pattern of repeated behaviour at Councillor Bothwell that ought to have been reasonably known to be unwelcome, and she would reasonably receive as intended to bully, embarrass, intimidate, or ridicule her – as per the definition in s. 3(k) of the *Code of Conduct*.

We must also address what constitutes a “workplace” in this context, since Town councillors are not employees of the Town, and limits on how this Office is prepared to address speech directed by one councillor towards another. The “venue” speech takes place in is important.

In Investigation Report No. IC-12378-0121 (*Kadwell and Vardy*), dated May 17, 2021, Mr. Maynard wrote about this Office’s jurisdiction to consider questions of decorum at Council meetings, and endorsed the following comments from Mr. Guy Giorno, the Integrity Commissioner for the Township of Madawaska Valley, in *Moore v. Maika*, 2018 ONMIC 7 (CanLII):

65. In the City of Toronto, integrity commissioners have consistently taken the position that they do not have jurisdiction over the behaviour of Council Members during Council and committee meetings. Professor David Mullan, the first municipal integrity commissioner ever appointed in Canada, noted that the Municipal Act requires that each municipality pass a procedure by-law and that the procedure by-law provides a clear mechanism for enforcing decorum and orderly conduct during meetings. Integrity Commissioner Mullan concluded:

“In general, the Integrity Commissioner does not have authority under the Code of Conduct to review complaints about the behaviour of Councillors at Council and Committee meetings. The behaviour of Councillors at Council, while regulated by the Code of Conduct, is the responsibility of Council (acting primarily through the Mayor or his deputy). Absent a resolution of Council requesting the Integrity Commissioner to become involved, this self-policing is part of the statutory rights and privileges of Council.”

66. Subsequently, Toronto’s Interim Integrity Commissioner Lorne Sossin, Integrity Commissioner Janet Leiper and Integrity Commissioner Valerie Jepson have all declined to exercise jurisdiction over comments made during meetings. As Integrity Commissioner Jepson has explained:

“The strong policy principle behind this approach is that the Integrity Commissioner ought not to interfere with the conduct and management of any particular meeting. This makes good sense. The Speaker, or any Chair of a meeting, requires a certain degree of autonomy to ensure that a meeting

is conducted in accordance with the procedural bylaw and as specifically stated therein, to oversee order and behaviour of members (s. 27-43(C)). So, if a councillor uses an insulting term against another councillor, in an effort to ensure decorum, the speaker might rule the question out of order and seek some remedial measure such as an apology or – in a serious case – an ejection from the meeting. In most cases, these issues are resolved and the meeting proceeds. There would be little gained by a subsequent referral to the Integrity Commissioner to review the actions”.

67. I also note, as Toronto’s integrity commissioners have observed, that federal and provincial integrity commissioners/ethics commissioners do not exercise jurisdiction over comments made in the House or in committee. In Parliament, the Legislature, and committees, responsibility for enforcing order rests with the Speakers and the committee chairs.

Mr. Maynard concluded that he did not have jurisdiction over the matters raised in the Kadwell-Vardy matter, and that the question of a Member’s Council/Committee meeting decorum could only be investigated if Council as a whole provided the Integrity Commissioner with such direction – otherwise deference had to be given to the *Procedure By-law*, and its application by the meeting Chair.

The cases cited in *Moore v. Maika* reflect a larger philosophy that politicians should have ample “room” to voice their opinions respecting political matters, and must have the right to disagree strongly with each other on matters being debated. That is a fundamental goal of a healthy democratic system. But we believe there must be limits to when one is considered to be engaged in “politics” in the first place – and do not think that such procedural protections extend to private emails between councillors, nor to emails with Town staff related to scheduling meetings – as was the case during the March 2021 exchanges. We consider day-to-day interactions like that with colleagues to be more analogous to “workplace” issues than “political” issues. Even though Town councillors are not legally employees, we imagine that councillors would still agree that attending the Town Council building and interacting with Town staff there is functionally analogous to interactions at any other workplace they might be part of.

The limitations to this Office’s jurisdiction over decorum in Council and committee meetings should be seen as a specific and targeted exception to the general rules in the *Code of Conduct* cited in this case – which are basically to treat other people respectfully. Outside of Council and committee meetings, the *Code of Conduct’s* rules and principles remain the standard – and those rules include clear

prohibitions against “making disparaging comments about another Member” (s. 4.1 (i)), and harassment (s. 12.1) as defined in s. 3(k).

The issue of whether Councillor Vaine contravened s 4.1 (i) is time-limited to the email exchange commencing March 9, 2021, in accordance with s. 1(e) of the Formal Complaint Procedure. While the general tone of the March 2021 emails between the Councillors was relatively sharp, we particularly note that at least one of Councillor Vaine’s comments was a pointed and needless insult. The comment “...in my opinion you try to come across as better than everyone else,” written on March 11, 2021, and copied to all other Members of Council and three senior members of staff, was unambiguously insulting. Further, Councillor Vaine, by his own admission, waited a day before sending this email, on account of his own anger – in other words, he took time to consider his response to Councillor Bothwell, and determined that the best course of action would be to impugn her character in front of their colleagues.

The analysis respecting whether Councillor Vaine’s behaviour towards Councillor Bothwell constituted “harassment”, as defined in the *Code of Conduct*, is straightforward. The evidence is clear that Councillor Bothwell found the March 2021 email exchange unwelcome, and it was well within the six-week limitation period for filing her complaint. Councillor Bothwell also established a pattern of repeated events and prior behaviour that Councillor Vaine directed towards her that also bothered her. Councillor Vaine either knew, or ought to have known, that Councillor Bothwell found these communications towards her unwelcome, as she specifically told him so.

In the June 2020 email correspondence, Councillor Bothwell told Councillor Vaine twice:

June 19, 2020

I do not feel your tone and personal attack is appropriate in this email and would appreciate an apology.

June 20, 2020

I do take this as a personal attack as it was directly in response to my email. It was circulated broadly to Council and staff and inferred some serious, unsubstantiated allegations.

I have been the recipient of a pattern of these types of aggressively worded emails

from you in the past and I have chosen not to engage and respond. This email has publicly questioned my integrity and motives, as you have as well done verbally in Council meetings with respect to my Committee involvement and some of my motions. You have made public statements on Facebook, including name-calling, that are slanderous. This is unacceptable and against the Code of Conduct.

Considering your email statement was made publicly and your response to me was private, I do not feel this is a sincere apology. If your intention is to truly repair the working relationship, and move forward in the best interests of all of Council and the Town, an unconditional, open public apology would be a start.

Councillor Vaine subsequently wrote the following to Councillor Bothwell privately on February 16, 2021 – which we imagine most recipients would find unwelcome, irrespective of whatever Councillor Vaine’s intent was:

In my opinion, sometimes I just find your ways of acting as being very underhanded and you sometimes seem to treat staff and other members of Council badly, which I feel borders on harassment.

Having said that I do admire your tenacity and your ability and willingness to read but you can’t attack experts just because they don’t say what you want them to say. I do feel that you can be an asset, I just think you misuse your abilities.

There are many times where I agree with you and your 3 friends but it is the way that you try to do things. Try being more inclusive and working together. Just a suggestion.

In addressing harassment complaints, the relevant viewpoint of what constitutes “welcome” correspondence is always that of the recipient, and not the sender.

Finally, during the March 2021 email chain, Councillor Bothwell wrote to Councillor Vaine:

March 12, 2021

Your inference, tone and personal attack against me in this email exchange is disrespectful and harassing and is not appropriate under our Council Code of Conduct:

- 4.1 (i) *In all respects, members shall:*
Refrain from making disparaging comments about another Member or unfounded accusations about the motives of another Member.

All of these replies clearly establish that Councillor Bothwell found her exchanges with Councillor Vaine unwelcome, and that she explicitly told him so. She clearly communicated to Councillor Vaine that the behaviour was unwanted and kept records of it. None of the exchanges occurred during a Council or committee meeting, which might have resulted in a different analysis. The history provided by Councillor Vaine from 2018 (i.e., that he and Councillor Bothwell once got along cordially) was ultimately irrelevant to the determination, because relationships can change over time, and we are satisfied from the evidence that Councillor Bothwell found Councillor Vaine's communications unwelcome between 2020-2021, and she communicated this to him.

Lastly, we wish to note that a decision was deliberately made not to interview the various witnesses proposed by Councillor Vaine. He indicated that those witnesses would speak to Councillor Bothwell's mistreatment of them, but we determined that even if that were true (which we take no position on, as it was not the subject of this investigation), that could not have possibly been a relevant defence respecting Councillor Vaine's own conduct, and his obligations under the *Code*.

Findings

We have determined that Councillor Vaine contravened sections 4.1 (i) and 12.1 of the *Code of Conduct*.

Councillor Vaine contravened s. 4.1 (i) by his email of March 11, 2021, in which he wrote, in part, "*in my opinion you try to come across as better than everyone else*". That comment was disparaging of Councillor Bothwell and was made in an email copied to all other Members of Council and several senior members of staff.

Councillor Vaine also harassed Councillor Bothwell, contrary to s. 12.1, as evidenced by various email exchanges between them over time, and on these occasions his interactions did not fall under the jurisdiction of a meeting chair under the *Procedural By-law*.

Where a contravention of the *Code of Conduct* is established, s. 223.4(5) of the *Municipal Act* allows for only two potential penalties: (i) a reprimand, or (ii) a suspension of the remuneration paid to the Member for up to 90 days. The decision is also left in the hands of Council as a whole – the Integrity Commissioner can only provide a recommendation on the appropriate penalty. We recognize this is an imperfect system, but all stakeholders are subject to it by virtue of provincial legislation, and our Office has no power to change it. The *Municipal Act* provision reads as follows:

Penalties

(5) *The municipality may impose either of the following penalties on a member of council or of a local board if the Commissioner reports to the municipality that, in his or her opinion, the member has contravened the code of conduct:*

1. *A reprimand*
2. *Suspension of the remuneration paid to the member in respect of his or her services as a member of council or of the local board, as the case may be, for a period of up to 90 days.*

In the circumstances, it is our view that a reprimand against Councillor Vaine would be appropriate. We do not find his conduct to be of a degree warranting a suspension of pay, and we also believe a public reprimand would be a meaningful consequence. We hope that this decision will give sufficient “notice” to all Members of Council respecting how ss. 4.1 (i) and 12.1 of the *Code of Conduct* will be interpreted in future. We also believe all councillors have vested interests in working in a pleasant and collaborative “workplace”, and will understand the harms that would arise from working in a workplace falling beneath this standard.

Decision and Publication

It has been determined that Councillor Vaine contravened sections 4.1 (i) and 12.1 of the *Code of Conduct*. The Integrity Commissioner accordingly recommends a reprimand against Councillor Vaine.

This Report and recommendation will be published by providing it to the Town to include on the public agenda at the Integrity Commissioner’s direction.

We thank the Parties for their cooperation throughout the investigation process.



Michael L. Maynard
Integrity Commissioner
Town of Grimsby



Benjamin Drory
Investigator
Office of the Integrity Commissioner