

**MUNICIPALITY OF CENTRAL MANITOULIN****REPORT ON COMPLAINT RE: J. BISAILLON****EXECUTIVE SUMMARY**

During the month of September 2025, the Integrity Commissioner received a Complaint naming Councillor J. Bisailon as Respondent and alleging breaches of the Code of Conduct. The allegations related to a committee meeting of August 21, 2025, wherein it was alleged that the Respondent violated the Code of Conduct by virtue of his presence thereat. At the same time, the Complainant also made an Application alleging a breach of the *Municipal Conflict of Interest Act* (“MCIA”) by the Respondent. This report addresses the Code of Conduct complaint as received by the Integrity Commissioner. A separate, parallel report addresses the MCIA application.

Following receipt of the Complaint the Integrity Commissioner interviewed the Applicant, requested relevant documents from the Municipality, and conducted interviews with the Respondent and any other relevant witness identified through review of the documentation or arising from the prior interviews. Following the completion of the inquiry process, the Integrity Commissioner provided a preliminary copy of the report to the Applicant and Respondent for comment. The Applicant and Respondent were invited to provide comment if desired. Any comments provided did not require further clarification in the language of the below report.

The Integrity Commissioner does not find that there has been a violation of the Code of Conduct by the Respondent as alleged in the original Complaint. Accordingly, no recommendations are made for Council on any penalty as no violation of the Code of Conduct is found.

ALL OF WHICH IS RESPECTFULLY SUBMITTED

*Zachary T. Courtemanche*

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Zachary Courtemanche

As provided to the Municipality, March 24, 2026

**MUNICIPALITY OF CENTRAL MANITOULIN**  
**REPORT ON COMPLAINT RE: J. BISSAILON**

1. During the month of September 2025, the Integrity Commissioner received a Complaint naming Councillor Bisailon as Respondent and alleging breaches of the Municipality's Code of Conduct ("Code"). The Complainant ultimately provided completed materials dated September 17, 2025 which was received by the Integrity Commissioner shortly thereafter on September 22, 2025.
2. Having reviewed the matter, the Integrity Commissioner has reviewed the Complaint and determined that it appears to include the necessary elements and received from a Complainant eligible to bring such a Complaint.
3. At the same time, the Complainant also made an Application alleging a breach of the *Municipal Conflict of Interest Act* ("MCIA") by the Respondent. This report addresses the Code of Conduct complaint as received by the Integrity Commissioner. A separate, parallel report addresses the *MCIA* application.
4. For ease of reference, this report has been labelled as CM-25-04.
5. Following receipt of the Complaint, the Integrity Commissioner interviewed the Complainant (as the individual will be referred to in this report and who is not a member of Council), requested relevant documents, and conducted interviews with the Respondent and any other relevant witness identified through review of the documentation or arising from the prior interviews. Where appropriate, the Integrity Commissioner interviews witnesses suggested by the Complainant, Respondent, or other witnesses in order to determine the relevant facts.

## THE RELEVANT PORTIONS OF THE CODE OF CONDUCT

6. As a first step, it must be noted that the Complaint alleges breaches of the “Incompatible Activity” section of the Code.
7. Specifically, and for ease of reference, the relevant portion of the Code is reproduced here:

### ***Incompatible Activity***

*Members of Council shall not engage in any activity, financial or otherwise, which is incompatible or inconsistent with the ethical discharge of their official duties to represent the public interest.*

*Specifically, members of Council shall not:*

- *Use any influence of their office for any purpose other than for their official duties;*
- *Act as an agent before Council any committee, board, or commission of Council;*
- *Solicit, demand, or accept the services of any corporation, employee, or individual providing services to the municipality at a time in which said person or corporation is being paid by the municipality;*
- *Use any information gained in the execution of their office that is not available to the general public for any purpose other than for their official duties;*
- *Place themselves in a position of obligation to any person or organization which might benefit from special consideration or may seek preferential treatment;*
- *Give preferential treatment to any person or organization in which a member or members of Council have a financial interest;*
- *Influence any administrative or Council decision or decision-making process involving or affecting any person or organization in which a member or members of Council have a financial interest; and,*
- *Use corporate materials, equipment, facilities, or employees for personal gain or for any private purpose.*

[emphasis added]

**BACKGROUND & FACTUAL BASIS OF THE COMPLAINT**

8. Following review of the relevant documentation and interviewing the relevant witnesses, such as the Complainant and Respondent, it is appropriate to summarize the relevant facts as it relates to the matter.
9. The facts as it relates to this particular Complaint do not seem to be in any real dispute.
10. The Complainant alleges that the Respondent attended a meeting of the Finance & Economic Development Committee on August 21, 2025 and failed to recuse himself from an item on the agenda about which the Complaint alleges he ought to have. The Complainant further alleges that, since the Respondent was present in the room during this agenda item, his mere presence would have affected the Committee's decision and/or biased the discussion. The Complainant alleges that this attendance is a contravention of the Incompatible Activity section of the Code.
11. The Respondent is not a voting member of this Committee, but attended the meeting in a non-voting capacity, which is a normal practice within this Municipality. This is a regular occurrence.
12. The Respondent did not ask questions or make any comment on the topic of conversation.
13. There was no motion voted upon in relation to this agenda item, nor was one proposed.

**FACTUAL DETERMINATIONS & ANALYSIS OF THE ISSUE**

14. As above, the Integrity Commissioner interviewed the relevant parties and gathered the necessary documentation in order to assess the within Complaint. Having collected and considered same, the following determinations have been made.
15. The pivotal question in this Complaint is whether the Respondent contravened the above-noted Code when he remained present in the August 21, 2025 meeting.

16. Arising from the inquiry conducted in this matter, such a determination cannot be made.
17. For clarity, this report does not consider the implications of the allegations relating to the *MClA*, which as above are dealt with in a separate report. However, it bears note that the *MClA*, as written, requires a member to “forthwith leave the meeting or the part of the meeting during which the matter is under consideration” when a matter is being considered in a meeting that is not open to the public. This requirement, by necessary implication, does not extend to a meeting that is open to the public, as the August 21, 2025 meeting was. Therefore, if there is no prohibition on a member’s attendance in a meeting even where a pecuniary interest exists, then the presence of such a member at a meeting in this regard does not appear to be unlawful.
18. Applied to the Municipality’s Code, the Complainant alleges that the presence of the Respondent could have would have affected the Committee’s decision and/or biased the discussion on the topic.
19. Moreover, the Committee did not vote on the item in question and no decision was made. Likewise, I am unable to find that the mere presence of the Respondent, when there is no requirement to absent himself, would have in some way prevented a decision point from being raised or made. I also cannot find that his attendance is outside of his official duties. Though the Respondent is not a voting member of the committee, attendance at committee meetings is a normal practice for councillors in this Municipality.

## **CONCLUDING REMARKS**

20. For the above reasons, the Integrity Commissioner is unable to conclude that a breach of the Code of Conduct occurred as alleged. Simply put, the Respondent did not violate the Code regarding the improper use of his office with respect to mere presence in a Committee meeting.

21. Since the Integrity Commissioner does not find that there has been a violation of the Code of Conduct by the Respondent as alleged in the Complaint, no recommendations are made to Council on any penalty where no violation of the Code of Conduct is found.
22. The parties are thanked for their cooperation in the process of addressing this Complaint and the completion of this report.
23. The Integrity Commissioner has considered the implications of subsection 223.8 of the *Municipal Act*, and has not found it to apply to the within matters.
24. Subsections 223.6(2) and 223.5(2.3) of the *Municipal Act*, as applicable, state that the Integrity Commissioner may disclose in these written reasons such information as, in the Integrity Commissioner's opinion, necessary. All the content of these reasons is, in the opinion of the Integrity Commissioner, necessary.
25. The Municipality is reminded that, pursuant to s.223.6(3), it shall ensure that the final report from this Complaint is made available to the public.
26. The Respondent and Complainant, should they wish to respond to the determinations in this report, ought to be permitted to do so.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED**

*Zachary T. Courtemanche*

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Zachary Courtemanche

March 18, 2026