



Boghosian+Allen LLP • Litigation Counsel • 37 Spadina Road, Toronto, ON M5R 2S9 Tel: 416-367-5558 Fax: 416-368-1010 • www.boglaw.ca

David G. Boghosian, LL.M.
Direct Tel: 416-367-5558 ext. 211
Email: dgb@boglaw.ca

October 14, 2025

VIA EMAIL TO CLERK (Matthew.Trennum@hamilton.ca)

Mayor and Members of Council
c/o Matthew Trennum, City Clerk
Hamilton City Hall
71 Main Street West
Hamilton, Ontario L8P 4Y5

Dear Mayor and Members of Council:

**RE: HAMILTON INTEGRITY COMMISSIONER 2024/2025
ANNUAL REPORT**

I am pleased to provide my annual report for the second year of my term as your Integrity Commissioner and Lobbyist Registrar through October 10, 2025.

Integrity Commissioner Services

Complaints and Investigations

During the past year, I received a total of 20 Code of Conduct Complaints made against 7 current Members of Council, one former Member of Council and two Members of Local Boards. A brief summary of those Complaints and their disposition follows:

1. 24-008 – Concerning an alleged disqualifying interest and improper use of influence on the part of a Member of Council. Public report issued dismissing Complaint;
2. 24-009 – We have no record of receiving a Complaint bearing this Complaint number.
3. 24-010 - Concerning social media comments by a Member of Council alleged to breach decorum. Complaint summarily dismissed; no formal Report issued;
4. 24-011 – Concerning social media posts by an EA of a Member of Council and conduct of Council generally – Complaint summarily dismissed; no formal Report issued. A subsequent request submitted in August 2025 to reconsider the Complaint based upon new evidence was recently denied.

5. 24-012 – Concerning public statements by a Member of Council allegedly breaching various sections of the Code of Conduct. Complaint summarily dismissed; no formal Report issued;
6. 24-013 – Complaint regarding improper campaign-related activity in a Councillor's Ward newsletter; matter resolved through informal resolution process; no formal Report issued;
7. 24-014 – Concerning alleged disqualifying or non-disqualifying interest not declared by a Member of Council. Public Report issued finding a violation by the Member of s. 8 of the Code of Conduct. Penalty of reprimand issued;
8. 24-015 – Concerning a statement in a Member's newsletter alleged to have breached s. 14.1 of the COC (failure to accurately convey information). Complaint dismissed; no formal Report issued.
9. 25-001 – Concerning alleged breaches of ss. 14.1 and 14.2 of the Code of Conduct by a Member of Council (communicating inaccurate information; personally disparaging another Member). Public report issued dismissing Complaint;
10. 25-002 – Concerning alleged use of City staff and City property for campaign-related purposes on the part of a Member of Council. Complaint dismissed; no formal Report issued;
11. 25-003 – Complaint against a Member of Council concerning disclosure of confidential information by a member of a Councillor's staff. Public report issued dismissing Complaint against the Member and referring the matter in respect of the staff member to Human Resources;
12. 25-004 – Complaint against a Member of a Local Board regarding allegedly defamatory statements against the Complainant in alleged violation of a number of sections of the Code of Conduct. Complaint dismissed; no formal Report issued. The Complainant has brought an Application for Judicial Review against the Integrity Commissioner in respect of the dismissal of the Complaint, which is ongoing;
13. 25-005- Complaint regarding conduct of a Member of Council in his capacity as a Member and also as a member of a body on which the Member is a Council-appointed alleging multiple violations of various provisions of the Code of Conduct. Complaint dismissed; no formal Report issued;
14. 25-006 – Complaint relating to the same Member of Council as Complaint 25-005 raising similar issues as the previous Complaint albeit in respect of different interactions between the Member and the Complainant. Complaint dismissed; no formal Report issued;

15. 25-007 – Complaint relating to actions determined to be on the part of staff, not Council or any particular Member of Council. Complaint dismissed; no formal Report issued;
16. 25-008 – Complaint regarding posts on the Ward blogsite of a Member of Council alleging disclosure of confidential information and improper use of influence. Complaint dismissed; no formal Report issued;
17. 25-009 - Complaint relating to alleged violations of s. 8 of the Code of Conduct on the part of a Member of Council in relation to a grant to a local charitable organization. Public Report issued dismissing Complaint;
18. 25-010 – Complaint relating to alleged mistreatment of the Complainant by a Member of Council at a private meeting to discuss City-related business in alleged contravention of various provisions of the Code of Conduct. Complaint dismissed; no formal Report issued;
19. 25-011 – This Complaint concerning social media posts and other public statements by a Member of Council allegedly defaming a City resident was received by my office on June 19, 2025. It remains under investigation.
20. 25-012 - Complaint related to the actions of a former Member of Council (who has not been on Council since the last municipal election) alleging breaches of s. 8 of the Code of Conduct on the basis that the Member had a pecuniary or other interest in a land transaction involving the City. Complaint dismissed; no formal Report issued;
21. 25-013 - I am currently in the process of investigating a Code of Conduct Complaint involving a Member of a Local Board regarding alleged financial misconduct related to the Local Board's funds.

Three of the aforementioned Complaint also alleged breaches of the *Municipal Conflict of Interest Act* (“MCIA”). All MCIA Complaints were dismissed.

Requests for Advice

I fielded 30 requests for advice from 11 different Members of Council in respect of MCIA and Code of Conduct matters and 7 such requests from Members of Local Boards. A solid majority of those inquiries related to potential conflict of interest concerns.

Gifts or Benefits Disclosure

I did not receive any Gifts or Benefits Disclosure Statements pursuant to s. 4.(5) of the Code of Conduct during this reporting period.

Education

I conducted Code of Conduct and MCIA training for Members of the Public Health Subcommittee on March 17, 2025.

I conducted Code of Conduct and MCIA training for a new member of Council on October 9, 2025.

Other

I created a Transparency and Disclosure Statement for declarations of interest pursuant to s. 8 of the Code of Conduct in January 2025.

I participated in discussions of proposed amendments to the Code of Conduct from a Member of Council with the City Solicitor in April 2025.

Lobbyist Registrar Services**Complaints and Investigations**

I did not receive any Complaints regarding breach of the Lobbyist Registry Bylaw during this reporting period.

Requests for Advice

I received 22 requests for advice from members of the public and one from a Member of Council in relation to the Lobbyist Registry Bylaw during this reporting period. Many of the questions from the public concerned whether a particular office holder with the City was someone in respect of whom they needed to register as a lobbyist before speaking to that person. Another repeated inquiry was whether the particular subject-matter intended to be discussed was something that required registration.

I also received multiple complaints that the Lobbyist Registry webpage is not user friendly, is difficult to navigate and has limitations (such as the inability to register using a United States address). I received two comments to the effect that the City of Toronto's Lobbyist Registry is much easier to navigate from the standpoint of registering as a lobbyist than Hamilton's. I have brought these concerns to the attention of appropriate staff and encourage the revamping of the webpage to enhance registration uptake and reduce user frustration.

Training

I conducted Lobbyist Registry Bylaw training at a Special Meeting of Council on December 11, 2024.

I trust this will be of interest to you. Please do not hesitate to contact me if you have any questions.

Yours very truly,

A handwritten signature in blue ink, appearing to read "D. Boghosian", with a long horizontal flourish extending to the right.

David G. Boghosian.
Integrity Commissioner,
City of Hamilton

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