



November 13, 2020
Office of the Integrity Commissioner
2 Bloor Street West, Suite 2100
Toronto, ON M4W 3E2

By fax: 416-314-8987

Dear Sir/Madam:

Re: Integrity Complaint re Conflict of Interest involving MPPs

Please accept this correspondence as a request to investigate this complaint in connection with Progressive Conservative MPPs breaching section 2 of the Members' Integrity Act, 1994 and Section 41 of the Legislative Assembly Act, R.S.O. 1990, CHAPTER L.10.

The grounds for this complaint are outlined below:

1. The Progressive Conservative Party of Ontario and some of its MPPs have received political donations from 2007 to 2018 from the long-term care lobby and from long-term care operators.
2. The Progressive Conservative Party of Ontario and some of its MPPs have very close ties to the long-term care industry and the long-term care lobby.
3. The Progressive Conservative Party of Ontario is planning to pass Bill 218 which indemnifies the long-term care industry from liability for negligence in its handling of the spread of COVID-19 in their facilities. This legislation furthers the private interests of the for-profit industry, with whom Conservative Ministers, the Premier and their political staff have close connections and from whom they have received political donations and is contrary to the interests of families, residents, staff and the public.
4. These actions either individually by MPPs or by the Ontario Progressive Conservative Party constitutes a conflict of interest pursuant to Section 2 of the Members' Integrity Act, 1994, which states,

"A member of the Assembly shall not make a decision or participate in making a decision in the execution of his or her office if the member knows or reasonably should know that in the making of the decision there is an opportunity to further the member's private interest or improperly to further another person's private interest."

5. These actions either individually by MPPs or by the Ontario Progressive Conservative Party breaches Section 41 of the Legislative Assembly Act, R.S.O. 1990, CHAPTER L.10 Consolidation Period, as amended states,

"No member of the Assembly shall knowingly accept or receive, either directly or indirectly, any fee, compensation or reward for or in respect of the drafting, advising upon, revising, promoting or opposing any bill, resolution, matter or thing submitted or intended to be submitted to the Assembly or a committee thereof."

6. 19 lobbyists under the Lobbyists Registration of the Office of the Integrity Commissioner, who have had past or current ties with the Long-Term Care Home industry have made political donations to Premier Doug Ford's Ontario Progressive Conservative Party.
7. Some of these registered lobbyists have made contributions to Caroline Mulroney's Leadership Campaign; Minister Lisa Macleod; and to Minister Christine Elliott's Leadership Campaign. In addition before registering as lobbyists, some of them held positions such as Chief of Staff to Attorney General Doug Downey; Premier Ford's Director of Marketing; Director of Communications to Ontario's Deputy Premier and Minister of Health; Director of Communications to Finance Minister Rod Philip; and Advisor to former Premier Mike Harris.
8. The receipt of these donations constitutes a conflict of interest, and we are of the opinion that Premier Ford's political party, Government, Ministers, and MPPs were or will be directly influenced by registered lobbyists who were hired by the Long-Term Care Home industry.
9. Some current Progressive Conservative MPPs received donations from individuals linked to long-term care operators, which is concerning because the Government is rushing the passing of Bill 218 which benefits those donors and companies.
10. James Schlegel, the CEO of Schlegel Villages, was one of the ten people appointed to the long-term care expert staffing panel. The Schlegel family owns 19 nursing homes across Ontario and has contributed \$120,624.00 to political parties since 2007.
11. The long-term care corporate lobby has donated \$666,857.00 to Ontario's political parties since 2007.
12. The Progressive Conservative Connections and Potential Conflicts of Interest are outlined below:

PREMIERS

Mike Harris

- Ties to MPP Mike Harris Jr.
- Progressive Conservative Premier, his son Mike Harris Jr. is currently a MPP
- Chair of Chartwell

Ernie Eves

- Progressive Conservative Premier
- Board member of Central Park Lodges between terms in office

Bill Davis

- Progressive Conservative Premier
- Board Member of Revera Inc

MINISTERS', LEADERS' OFFICES

Donna Duncan

- Former Policy Advisor to John Tory from 2006-07 when he was leader of Ontario PC
- Current CEO of OLTCA

Christopher Chapin

- Ties to MPP Caroline Mulroney (Minister of Transportation), Vic Fedeli (Minister of Economic Development) and Christine Elliot (Minister of Health)
- Senior Campaign Advisor for Caroline Mulroney's leadership campaign (Jan. to Mar. 2018)
- Deputy Digital Director, PC Party (June 2017-Jan. 2018)
- Digital Comms Advisor, Office of the Leader of Opposition, Patrick Brown (Now Mayor of Brampton) and Vic Fedeli (Current Minister of Economic Development) (June 2015 to Jan. 2018)
- Digital lead, Christine Elliott's leadership campaign (2014-15)
- Senior Campaign Advisor for Caroline Mulroney's leadership campaign.
- Lobbyist for Caressant Care as part of Upstream Strategy Group from August 2018-April 2020

Andrew Brander

- Ties to MPP Rod Phillips (Minister of Finance)
- Former Director of Communications for MPP Rod Phillips who is currently Finance Minister under Ford Government. Worked for a decade in the Harper administration.
- Lobbyist for OLTCA from April 2020 to Present

Carly Luis

- Ties to MPP Vic Fedeli (Minister of Economic Development) and MPP Christine Elliott (Minister of Health)
- Director of Strategic Communications, Office of the Leader of the Ontario PCs from January 2017 to March 2018 (Vic Fedeli)
- Strategic Communications Advisor, Office of Leader of the Ontario PCs from May 2015 to January 2017 and Manager of Stakeholder Relations for Ontario PC in 2014.
- Is currently Director of Communications for the Minister of Health, Christine Elliott
- Lobbyist for Chartwell from March to June 2020
- Lobbyist for OLTCA from October 2019 to May 2020

Jessica Trepanier

- Ties to MPP Doug Downey (Ontario Attorney General), MPP Caroline Mulroney (Minister of Transportation) and MPP Lisa Thompson (Minister of Government and Consumer Services)
- Press Secretary and Issues Manager at the Office of the Ontario Attorney General, (Doug Downey) from July 2018 to February 2019.
- Communications Advisor for Caroline Mulroney's Campaign from February to June 2018 and Legislative Assistant for Ontario PC MPP Lisa Thompson from August 2015 to February 2018.
- Public Relations position for Southbridge Care Homes working under Smith Com.

Michael Wilson

- Ties to MPP Doug Downey (Ontario Attorney General)
- Chief of Staff for Doug Downey, Ontario Attorney General from June 2018 to January 2020
- Lobbyist for Sienna Senior Living from May to June 2020

CLOSE ADVISORS TO PREMIER DOUG FORD

Melissa Lantsman

- War Room Director and Spokesperson for Doug Ford's campaign from February to June 2018.
- Former (to early 2020) Vice President Conservative Party of Ontario
- Campaign Director, Caroline Mulroney's leadership campaign.
- Director of Communications for the Minister of Finance (Jim Flaherty) in federal government from December 2013 to November 2015.
- Lobbyist for Extendicare from April 2020 to present.

Patrick Tuns

- Former Deputy Campaign Manager for Doug Ford's leadership race and 2018 election campaign
- Lobbyist for Caressant Care as part of Upstream Strategy Group from July 2018 to April 2020

Hazel McCallion – Former Mayor of Mississauga

- Endorsed Ford's campaign in 2018
- Chief Elder Officer (a newly formed position) at Revera Inc.

Lauren McDonald

- Ties to MPP Sylvia Jones (Solicitor General of Ontario)
- Director of Marketing in the Ontario Office of the Premier, Doug Ford from July 2018 to August 2019
- Special Assistant to Ontario PC MPP Sylvia Jones (now Solicitor General) from June to September 2014
- Constituency Assistant for Conservative MP David Tilson from May to September 2013
- Lobbyist for Revera as part of Proof Inc. from May 2020 to September 2020

Brayden Akers

- Ties to MPP Greg Rickford (Minister of Northern Development, Energy, Mines and Indigenous Affairs)
- Former Director of Communication to Greg Rickford, Ontario's Minister of Northern Development, energy, mines and Indigenous affairs
- Senior Political Staff Member in Harper Government
- Lobbyist for Sienna Senior Living as part of Navigator LTD from June 2020 to Present

SUPER AGENCY APPOINTEE

Shelly Jamieson

- Was Executive Director of Ontario Nursing Home Association and VP/President of Extendicare then was appointed to Harris' government Health Restructuring Commission (1995) where they ordered the closure of thousands of chronic care hospital beds from 1997-2000. Then the Harris government tendered 20,000 new long-term care beds to replace them. The majority of the beds went to for-profit providers including Extendicare. Ms. Jamieson then became President of Extendicare.
- On the Board of Ontario Health (New Super Agency), appointed by the Ford Government.

It is our position that the political donations received by the Ontario Progressive Conservative Party and its MPPs, and the close relationships they have with the long-term care home industry represents a conflict of interest that needs to be investigated.

As a result of this conflict of interest these MPPs should recuse themselves from any vote on Bill 218, Supporting Ontario's Recovery and Municipal Elections Act, 2020 as this Bill in its current form directly benefits the long-term care home industry.

Please investigate the following MPPs and any conflicts of interest as it relates to the receipt of political donations from the long-term care industry, including individuals linked to this industry, and/or in connection with the close ties to the long-term care lobby and the votes of these MPPs to support the passage of Bill 218:

Hon. Ted Arnott
Hon. Doug Downey
Hon. Christine Elliott
Hon. Vic Fedeli
Rt. Hon. Doug Ford
MPP Michael Harris, Jr.
Hon. Sylvia Jones
Hon. Lisa McLeod
Hon. Caroline Mulroney
Hon. Rod Phillips
Hon. Greg Rickford
MPP Lisa Thompson

Sincerely,



Natalie Mehra
Executive Director