



Report

City Council

The Corporation of the City of Brampton

Complaint

On July 10, 2019, City Council unanimously voted to provide funds of up to \$150,000 to a corporation known as Brampton Focus Community Media Inc. (“Brampton Focus”).

Brampton Focus is a relatively small, non-profit and non-share corporation operating and registered in the Province of Ontario. It is predominantly a community and media organization which covers what is happening in the City of Brampton (the “City”) by interviewing and engaging with numerous public officials and political representatives including, but not limited to, Members of Parliament, Premiers, and City Councillors. Brampton Focus was initiated in 2015 as a community group and was subsequently incorporated in September 2016.

Neighborhood Watch Brampton (“Neighborhood Watch”) is a program that was established in July 2016 under the management of Brampton Focus. Prior to operating under Brampton Focus, Neighborhood Watch was previously operating under the umbrella of Brampton Safe City Association.

The relationship between Brampton Focus and Neighborhood Watch is that Brampton Focus is the parent organization of the Neighborhood Watch program. The Board of Directors of Brampton Focus govern the operations of Neighborhood Watch. The Neighborhood Watch program aims to prevent and reduce property crimes through education and enhancing neighborhood connections via interpersonal surveillance and promoting a culture of “looking out for each other”.

On July 24, 2019, I received a complaint against all City Councillors and Mayor Brown (collectively referred to herein as the “Respondents”) from a Brampton resident, Bruce Marshall (“Mr. Marshall” or the “Complainant”). The complaint was comprised of a detailed memorandum as well as supporting documentation. The Complainant alleged that City Council breached City By-laws and the Council Code of Conduct (the “Code of Conduct”) in granting \$150,000 to Brampton Focus.

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Specifically, the Complainant alleged that the following By-laws and Code of Conduct rules were breached with respect to the City's decision to fund Brampton Focus, as well as the process and manner in which that decision was made by City Council:

- 1) Purchasing By-law 19-2018;
- 2) Section 4 of the Code of Conduct and the "gift registry directive"; and
- 3) Lobbyist Registry By-law 149-2015.

The Complainant further alleged that one City Councillor may have breached the *Municipal Conflict of Interest Act* because he was a founding Director of Brampton Focus – thus, he had a conflict of interest in participating in the vote to fund an organization that he had a historical relationship with.

The Complainant raised the following five allegations, which he relied upon to substantiate his claim that City Council breached the Purchasing By-law, the Lobbyist Registry By-law, the Code of Conduct, and the *Municipal Conflict of Interest Act*:

- a) Brampton Focus lobbied the City without registration or reporting;
- b) The appropriate procedure under the Purchasing By-law was not followed;
- c) Councillors received gifts from Brampton Focus without registering them;
- d) There was a perceived conflict of interest due to one City Councillor being a member of Brampton Focus (and/or given his historical relationship with Brampton Focus) and failing to declare his pecuniary interest in the corporation when the matter was being discussed at City Council meetings on May 8, 2019 and July 10, 2019;
- e) There was lack of transparency respecting the business of Brampton Focus, its ability to render the services that the City provided funding for, and the relationship between Brampton Focus and the City; and
- f) The decision to provide funds to Brampton Focus disallowed a competitive process to take place, put simply – that others were not allowed to compete to offer the same services that Brampton Focus was purporting to offer through Neighborhood Watch.

The allegations listed above will collectively be referred to herein as the "Complaint".

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Background and Summary

On or about May 1, 2019, Neighborhood Watch was added as a discussion item at the request of Mayor Brown for a City Council meeting on May 8, 2019.

During the City Council meeting on May 8, 2019, City Council received a delegation from Brampton Focus members, Fazal Khan (“Mr. Khan”) and Don McLeod (“Mr. McLeod”). Mr. Khan and Mr. McLeod offered a presentation to City Council on Neighborhood Watch and Brampton Focus. At the end of the delegation, City Council agreed that staff would report back to the Committee of Council by June 12, 2019 on the feasibility of the City’s partnership to expand Neighborhood Watch. I attach the relevant pages from the agenda and meeting minutes for the May 8, 2019 City Council meeting hereto as **Appendix “1”**.

Between May 8, 2019 and July 10, 2019, City staff prepared a written report for Council (dated May 9, 2019) on the feasibility of funding Neighborhood Watch, which I attach hereto as **Appendix “2”**.

On July 10, 2019, a City Council meeting was held wherein the Report prepared by City staff, attached as **Appendix “2”** was received. Council discussed the feasibility of providing funds to Brampton Focus/Neighborhood Watch, as well as the need for a clear breakdown of uses of the funding (i.e. salaries for employees, events, rent, etc.). City Council also asked questions to City staff related to the applicability of the Purchasing By-law. Eventually, a motion was voted on unanimously by City Council on the following:

- That should Council direct staff to proceed with funding Brampton Focus, “up to \$150,000” be allocated from the Community Safety Project for the 6-month expansion of the Neighborhood Watch program (as a pilot program) in consultation with the Community Safety Advisory Committee;
- That Council encourage Brampton Focus to continue to collaborate with Peel Regional Police on the expansion of the Neighborhood Watch program;
- That Brampton Focus actively search and obtain alternative sources of funding “to reduce the reliance on City funds in future years to ensure a sustainable Neighborhood Watch program”; and
- That Strategic Communications partner with Brampton Focus to provide video creation and content services.

The above-noted items are outlined in pages 26 and 27 of the meeting minutes for the July 10, 2019 meeting (attached hereto as **Appendix “3”**).

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Brampton Focus had originally requested \$300,000 of funding. All members of Council voted to provide up to \$150,000 to Brampton Focus/Neighborhood Watch. There was no agreement to fund Brampton Focus/Neighborhood Watch permanently.

On July 24, 2019, Mr. Marshall filed his Complaint with my office by email. In the months that followed, Mr. Marshall provided additional information or subsequent updates to me via email. I have taken all of what he provided into consideration in making this decision.

During the period between August 2019 and November, 2019, I conducted numerous investigative interviews with various individuals, including all members of Council, Mayor Brown, members from Brampton Focus, the City Solicitor at the time the decision to render funds to Brampton Focus was made (Denis Squires), the acting CAO at the time (Joseph Pittari), City staff who were involved in the decision process (Razmin Said), the City Clerk (Peter Fay), and the Complainant. I also received a large volume of documentary evidence from the individuals that I interviewed, which of course I have considered in rendering this Report.

This investigation was extremely document heavy – thus, while I have reviewed and considered all documents during the course of my investigation and in rendering this Report, I will *only* reference key pieces of evidence for the purpose of this Report.

Process Followed

In ensuring fairness to both the Complainant and the Respondents, I have followed the Council Code of Conduct Complaint Protocol (the “Complaint Protocol”) during the course of my investigation.

I ensured that the Respondents had an adequate opportunity to respond to the Complainant’s specific allegations by way of thorough investigative interviews that I conducted with each of the Respondents. During the investigative interviews, I put the specific allegations from the Complainant to each of the Respondents.

Positions of the Parties

Complainant’s Position:

The Complainant’s position is summarized under a) – f) in the “Complaint” section of this Report. The Complainant has also provided me with particulars that he relied on in support of each allegation, which I will outline below.

The Complainant’s position respecting allegations a) – f) is as follows:

a) Brampton Focus lobbied the City without registration or reporting.

The Complainant alleges that “during the course of the preparation of reports by City staff, members of Brampton Focus “continued an intense lobbying effort”, targeting each

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member of Council. Further, the Complainant alleges that this was done without Brampton Focus registering as lobbyist and without specifically registering their multiple interactions with Councillors, all of which was contrary to the Lobbyist Registry By-law.

b) The appropriate procedure under the Purchasing By-law was not followed.

The Complainant's view is that the Purchasing By-law requires a Request for Proposal by the City for purchases of \$100,000 or greater, which was the case respecting the funding provided to Brampton Focus.

Further, the Complainant alleges that at the May 8, 2019 City Council meeting, the City Councillors did not move to waive or suspend the Purchasing By-law rules, nor did they invoke any of the conditions under Schedule "C" of the Purchasing By-law, which would allow the City to exclude a procurement from being subject to a competitive procurement process.

c) Councillors received gifts from Brampton Focus without registering them.

The Complainant alleges that "Brampton Focus provided in-kind gifts of recording and broadcasting advertorial interviews as part of their lobbying effort". According to the Complainant, the Respondents did not register the said advertorial coverage as gifts in the City's gift registry (the "Gift Registry") and the advertorial work amounted to \$150,000. The Complainant alleges that both Brampton Focus and City Councillors contravened the Purchasing By-law and the Lobbyist By-law during those moments of contact.

d) There was a perceived conflict of interest due to one City Councillor being a member of Brampton Focus (and/or given his historical relationship with Brampton Focus) and failing to declare his pecuniary interest in the corporation when the matter was being discussed at City Council meetings on May 8, 2019 and July 10, 2019.

The Complainant alleges that at the time City Council voted in favor of providing Brampton Focus with \$150,000 worth of funding (on July 10, 2019), Councillor Vicente was a member of Brampton Focus and failed to disclose his pecuniary interest during the City Council discussions on May 8, 2019 and July 10, 2019.

Further, the Complainant holds the view that while Councillor Vicente's interest in Brampton Focus may not meet the test under the *Municipal Conflict of Interest Act*, Councillor Vicente's participation and vote during the City Council meetings could have been *perceived* by taxpayers as Councillor Vicente providing an unfair advantage to a Corporation with which he has a "relationship".

Further, the Complainant states that "at no time" did Councillor Vicente "absent himself from the debate and the vote".

e) Lack of transparency respecting the business of Brampton Focus, its ability to render the services that the City provided funding for, and the relationship between Brampton Focus and the City.

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In his Complaint, the Complainant posed a number of questions pertaining to Brampton Focus and funding that was granted. The questions imply that there was a lack of transparency with respect to Brampton Focus as a corporation, its management, its ability to deliver “an important corporate function on behalf of the taxpayers of Brampton” and whether Brampton taxpayers would be getting “value for money” through this funding decision.

The Complainant raised further concerns regarding how Brampton residents’ data would be protected from breaches of the *Municipal Freedom of Information and Privacy act*, (this is under the assumption that Brampton Focus would be using residents’ data to pursue its functions).

f) The decision to provide funds to Brampton Focus disallowed a competitive process to take place.

The Complainant asserts that “Council has a fiduciary duty to be prudent managers of taxpayers money in providing services” and that “dozens of reputable firms and individuals” could provide “the services purchased by City Council on July 10, 2019”.

Further, the Complainant believes that a competitive process was not undertaken due to the influence of gifts and advertorial coverage received and “hidden” by City Councillors and due to the relationship that “one Councillor” had with Brampton Focus.

As there are a total of 11 Respondents to this Complaint, in attempting to be as efficient as possible, I have employed a general approach in outlining the Respondents position respecting allegations a) – g).

Respondents’ Position:

I will outline the Respondents’ position below, based both on my investigative interviews with each of the Respondents and my review of any corresponding material that was provided to me.

Generally, Councillors were of the view that the funding was not a “procurement” but was a grant. When asked why Councillors were of this view, they stated that they relied on the advice of the CAO (Joseph Pittari) and the City Solicitor (Denis Squires) at the time:

“I took their word for it that it was all in the confines of the regular process and that he had discretion to do that”.

With respect to receiving gifts and the Canada day coverage, Councillors did not view the Canada day coverage as a gift. When asked if they viewed the coverage as a personal endorsement, the response was, “*absolutely not*”. Councillors generally viewed Brampton Focus as a “*communications group*”, and some drew a parallel to other media organizations by stating that, “*it’s no different than me going on Portuguese TV or Punjab TV to promote a BBQ event. In my mind, there’s an event that City of Brampton is organizing – it’s no different than that*”.

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With respect to allegations of conflict of interest and the involvement of Councillor Vicente or Councillor Santos, some Councillors did not recall Councillor Santos and Councillor Vicente declaring their involvement in Brampton Focus or the fact that they explicitly stated that they had resigned during the City Council meetings. Some Councillors explicitly recalled that both Councillor Vicente and Councillor Santos declared their involvement and stated that they were no longer members.

Documentary Evidence and Findings of Fact

I will now outline my findings of fact pertaining to allegations a) – f), which I have determined by assessing key documentary evidence in detail. I will then use these findings of fact in analyzing key issues (under the “Issues and Analysis” section of this Report) and determining whether those issues are with or without merit.

a) Brampton Focus lobbied the City without registration or reporting.

Based on my review of the documentary evidence, I find that the following three questions must be answered to determine whether Brampton Focus “lobbied” the City without registration or reporting:

- i. Did Brampton Focus have discussions with Councillors prior to, during, and after the City’s decision to provide funding to Brampton Focus?;*
- ii. Did Brampton Focus have discussions with City staff prior to and during the process of decision-making to provide funding to Brampton Focus?; and*
- iii. Is Brampton Focus a registered lobbyist?*

I will now consider each of the above-noted three questions in turn.

- i. Did Brampton Focus have discussions with Councillors prior to, during, and after the City’s decision to provide funding to Brampton Focus?*

The documentary evidence that has been submitted to my office shows that members of Brampton Focus, primarily Mr. Khan, had been corresponding with City Councillors prior to, during, and after the City Council meetings. For example, I have viewed emails (dated March 26, 2019) from City Councillors to Mr. Khan inviting Neighborhood Watch to attend community meetings. I attach a copy of that email hereto as **Appendix “4”**.

There are also emails from Mr. Khan to individual Councillors, inviting them to participate in recording a brief promotional message for a Canada Day celebration at Chinguacousy Park, which I will discuss in further detail with respect to allegation c). I attach a copy of that email hereto as **Appendix “5”**.

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I also note emails from Mr. Khan to Councillors and Mayor Brown, thanking them for approving the funding (dated July 12, 2019) and providing them with a 6-month implementation plan for Neighborhood Watch (dated July 18, 2019). I attach a copy of both items hereto as **Appendix “6”** and **Appendix “7”**. There was also an email from Mr. Khan to some of the City Councillors, dated July 23, 2019, wherein he provided an update on a new social media service called “Nextdoor”. I attach a copy of that email hereto as **Appendix “8”**.

In my review of documents, I have viewed emails which indicate that Brampton Focus had also been corresponding with Councillors during the decision-making process. For example, I note an email from Mr. McLeod, President of Brampton Focus, dated May 9, 2019, wherein he thanks City Council for the opportunity to present at the City Council meeting the day before and for “exploring the opportunity to work closely with Brampton Focus raise issues in Brampton”. In this email, Mr. McLeod further promotes Neighborhood Watch’s vision of “ensuring the safety of the residents” and “informing and educating”. I attach a copy of that email hereto as **Appendix “9”**. I note that this email was sent by Mr. McLeod between the first City Council meeting (May 8, 2019) and the second City Council meeting in which the City’s funding for Brampton Focus was officially voted on (July 10, 2019).

I further note that the discussion item of Neighborhood Watch was added to the May 8, 2019 Council agenda pursuant to an email from Mayor Brown to the City Clerk dated May 1, 2019, which is attached at **Appendix “10”**. I note that a meeting occurred between Mayor Brown and Brampton Focus on November 12, 2018 in which Mr. Khan presented regarding the Neighborhood Watch program. An email indicating Mr. Khan’s confirmation of this fact as well as a copy of the presentation handed by Mr. Khan to Mayor Brown is attached hereto as **Appendix “11”** and **Appendix “12”** respectively.

Overall, on the basis of the documentary evidence, I find that Brampton Focus had been corresponding with Councillors prior to the first City Council meeting (May 8, 2019), when the decision to fund Brampton Focus was first discussed at a City Council meeting. Whether such communication amounts to “lobbying” will be addressed in the “Issues and Analysis” section of this Report.

- ii. *Did Brampton Focus have discussions with City staff prior to and during the process of decision-making by the City to provide funding to Brampton Focus?*

Based on my review of the emails that have been submitted to my office, I find that there were email exchanges between Brampton Focus and City staff (and vice-versa) both prior to and during the City’s decision-making process to fund Brampton Focus (between May 8, 2019 and July 10, 2019). I am in receipt of a number of email exchanges between City staff and Brampton Focus, however, I have chosen to attach one email chain between members of Brampton Focus and the City’s Community Safety Advisor, Razmin Said (“Ms. Said”), dated May 21,

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2019 hereto as **Appendix “13”**. I also attach an email from Jason Tamming (“Mr. Tamming”), Director of Strategic Communications at the City, to Mr. McLeod and Mr. Khan enclosing a draft report on Brampton Focus and Neighborhood Watch. This email is dated June 21, 2019 and I attach it hereto as **Appendix “14”**.

Further, I attach an email chain hereto as **Appendix “15”** between Ms. Said and Mr. Khan regarding a “Neighborhood Watch Discussion” dated October 26, 2018, which refers to a phone conversation and a meeting to discuss.

iii. Is Brampton Focus a registered lobbyist?

I find that Brampton Focus *was* not and *is* not a registered lobbyist in the City’s Lobbyist Registry.

The City’s Lobbyist registry is public and is easily accessible online via the following link: service.brampton.ca/lobbyist/lobbyist-search/. I have conducted a search myself for “Brampton Focus” as well as “Donald McLeod” and “Fazal Khan” and can confirm that no results were found. I attach the screenshots of my searches for all three names hereto as **Appendix “16”**.

b) The appropriate procedure under the Purchasing By-law was not followed.

Although I have received documentary evidence regarding this allegation, I will not conduct a fact-finding exercise with respect to this allegation since opining on this issue is simply outside of my jurisdiction. I will elaborate on this further in the “Issues and Analysis” section of this Report.

c) Councillors received gifts from Brampton Focus without registering them.

Although Brampton Focus interviewed some of the Councillors at a Canada Day event which took place at Chinguacousy Park, I find that these advertorial interviews were *not* in-kind gifts which require registration in the City’s gift registry. I find this on the basis that the Canada Day video coverage provided by Brampton Focus was not free. In fact, the City was charged \$9,887.50 for the coverage, which is evidenced by an invoice that I attach hereto as **Appendix “17”**. When I put the invoice to the Complainant during his investigative interview, he stated that he was not aware of the invoice and did not know of its existence.

d) There was a perceived conflict of interest due to one City Councillor being a member of Brampton Focus (and/or given his historical relationship with Brampton Focus) and failing to declare his pecuniary interest in the corporation when the matter was being discussed at City Council meetings on May 8, 2019 and July 10, 2019.

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The following two questions must be considered in order to make a finding with respect to the above noted allegation:

- i. *Was Councillor Vicente a member of Brampton Focus at the time that the funding for Neighborhood Watch was discussed during the City Council meetings on May 8, 2019 and July 10, 2019?; and*
- ii. *If so, did Councillor Vicente declare his involvement during the City Council meetings on May 8, 2019 and July 10, 2019?*

I will now consider these two questions in light of the documentary evidence.

- i. *Was Councillor Vicente a member of Brampton Focus at the time that the funding for Neighborhood Watch was discussed during the City Council meetings on May 8, 2019 and July 10, 2019?*

A corporation point in time report for Brampton Focus lists “Paul Vicente” as a Director of Brampton Focus Community Media Inc. as of July 10, 2019. I attach the corporation point in time report hereto as **Appendix “18”**. I am also in receipt of a letter from Mr. McLeod to Councillor Vicente stating that Councillor Vicente had resigned from the Board of Brampton Focus on December 22, 2017. Furthermore, the letter suggests that the corporation point in time report is inaccurate in that it had not been updated following Councillor Vicente’s resignation due to a clerical error:

*“Our records show receipt of a resignation letter from you, and our board’s **acceptance of your resignation effective Dec 22, 2017**. As you know, the Board of Directors for Brampton Focus has operated since Dec 22, 2017 without your involvement in our decision making, direction, strategy, day to day activities and meetings.*

“Please note that upon receiving your resignation, I personally filed with the Ontario Ministry of Government Services a notification of your end of tenure. Unfortunately, having followed up with the Ministry on August 7, 2019, I can confirm that their records have not been updated and you (as well as others) are incorrectly listed as a board member. I am in contact with the Ministry to find out why this occurred and to ensure you are removed promptly.”

I attach a full copy of Mr. McLeod’s Letter to Councillor Vicente dated August 8, 2019 hereto as **Appendix “19”**.

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I am also in receipt of an email dated December 22, 2017, which Councillor Vicente sent to Brampton Focus providing notice of his resignation:

“... I am confirming today that after spending 3 impactful years as a Founding Director of Brampton Focus, I am stepping down from the Board”.

I attach a copy of Councillor Vicente’s resignation email dated December 22, 2017 hereto as **Appendix “20”**.

The date of Councillor Vicente’s resignation email corresponds with the date that Councillor Vicente posted on Facebook regarding his resignation. The Facebook post is dated December 22, 2017, wherein Councillor Vicente states, “I am stepping down from the board”. I attach a copy of that Facebook post hereto as **Appendix “21”**.

I also reviewed the By-laws for Brampton Focus, particularly the process of a member resigning from the Board. Brampton Focus’s By-law states follows with respect to the removal of their Direction:

“Resignation from the Board must be in writing and received by the secretary”.

I attach a copy of that provision from the By-law hereto as **Appendix “22”**.

The documentary evidence shows that Councillor Vicente resigned from Brampton Focus on December 22, 2017. Nevertheless, a question that arose as a corollary to Mr. McLeod’s letter to Councillor Vicente dated August 8, 2019 acknowledging receipt of his resignation in December 2017 is: was there in fact a clerical error on part of the Ministry of Government Services, which resulted in the corporation point in time report being incorrect?

During the course of my investigative interview with Mr. McLeod, I inquired about the clerical error and why the corporation point in time report had not been updated if Councillor Vicente indeed resigned nearly two years before. In response, Mr. McLeod was able to provide me with email exchanges between himself and Wendy Grant, a representative from the Ministry of Government Services, which demonstrate that Mr. McLeod had inadvertently completed the government form incorrectly. I attach those email exchanges and supporting documents hereto as **Appendix “23”**. To be specific, the attachments showed that Mr. McLeod made an error in completing the government form (Form 1) for removal of a Director. The documents attached as **Appendices “19-22”** suggest that Councillor Vicente being listed in the corporation point in time report attached as **Appendix “18”** was an error.

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Another question that arose during the course of my investigation was whether Councillor Vicente had backdated his resignation letter after learning of the Complaint filed against him. In the relevant documents submitted by interviewees, I discovered an email from a journalist from Brampton Guardian in which excerpts from an alleged group text message conversation were included. The journalist from Brampton Guardian insinuated that the text messages show Councillors Vicente and Santos engaging in a Brampton Focus group chat well after their stated resignation date of December 2017. I attach the email communication from the Brampton Guardian journalist and copies of the text messages hereto as **Appendix “24”**.

I do not find “cut and paste” copies of purported WhatsApp conversations I attached at **Appendix “24”** to be reliable evidence for the reason that when a conversation is copied and pasted rather than screenshotted, the text may easily be tampered with and there is no way of me confirming that was not the case. In any event, even if I were to consider the text messages as reliable evidence, I would specifically note the conversation in the second half of page 2, wherein, it was stated that “Paul or anyone else who is RUNNING would have to resign” (presumably from their position in Brampton Focus). The chain of text messages was relied on to support the notion that Councillor Vicente and Councillor Santos backdated their resignations from Brampton Focus, after having a conversation in the group chat. Even if I were to consider this evidence as being credible, I find it to be meaningless. The last excerpt in the chain of text messages is dated July 14, 15, 2017. Councillor Vicente’s resignation letter (attached as **Appendix “20”**) is dated December 22, 2017. This suggests that even if Councillor Vicente was part of a group chat with Brampton Focus members, that was in July 2017, approximately 5 months before he tendered his resignation.

A further allegation that surfaced during the course of my investigation was that Brampton Focus was operating out of a house located on Main Street in Brampton, which was allegedly owned by Councillor Vicente. I put this question to Councillor Vicente during my investigation and he responded that, since the day that he became a Regional Councillor, “the house has not been used by anyone except myself and members of my family”. A copy of that correspondence from Councillor Vicente to me dated October 21, 2019 is attached hereto as **Appendix “25”**. Finally, during my investigation, a formal opinion by the former Integrity and Ethics Commissioner of Brampton, Suzanne Craig (“Ms. Craig”), dated March 21, 2019 and addressed to Councillor Vicente, was produced. The memorandum indicated that Councillor Vicente had requested an opinion on whether his participation in discussions at Brampton City Council meetings respecting certain matters would trigger the applications of the provisions of the Code of Conduct or the *Municipal Conflict of Interest Act*. Amongst several matters that Councillor Vicente sought an opinion on was the following matter:

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“Decisions related to organizations with which you [Councillor Vicente] previously served as a volunteer through their Boards; specifically, Cara Bram (cultural festival) and Brampton Focus (community media and Neighborhood Watch program).”

I attach a copy the memorandum hereto as **Appendix “26”**.

Of particular significance is the second page of the memorandum, wherein, Ms. Craig notes that Councillor Vicente owns two houses in the City of Brampton, both of which are Heritage Houses located on Wellington Street East and on Williams Street, off of Main Street North. Ms. Craig further noted that the second house was used primarily to store various equipment, however, that both houses were used as residences, *not* for commercial purposes.

Of further significance is Ms. Craig’s comment in the memorandum dated March 21, 2019, in which she states that Councillor Vicente was the “founder and member” of Brampton Focus “until December 17, 2018”. There is a discrepancy between this date and the date referenced in Councillor Vicente’s resignation email. However, I asked Councillor Vicente about this and he confirmed that he had resigned on December 22, 2017 rather than December 17, 2018.

Overall, based on my consideration of all the documentary evidence before me, I find that Councillor Vicente was not a member of Brampton Focus at the time did the decision to fund Neighborhood Watch was discussed and voted upon during the Council meetings on May 8, 2019 and July 10, 2019. I find that there was a genuine clerical error made by Mr. McLeod, albeit a negligent error. I also find that Brampton Focus was not operating out of Councillor Vicente’s house.

- I. *If so, did Councillor Vicente declare his involvement during the City Council meetings on May 8, 2019 and July 10, 2019?*

I have viewed and have a transcription of the City Council meetings which occurred on May 8, 2019 and July 10, 2019. I note specifically that during the May 8, 2019 meeting, both Councillors Vicente and Santos declared their involvement as founders and Board Members of Brampton Focus. Councillor Santos specifically stated that her and Councillor Vicente stepped down from the Board prior to the election. I include the relevant excerpts from the May 8, 2019 transcript directly below:

“Councillor Vicente: Thank you Mr. Mayor. As a very proud founder of Brampton Focus back in 2015, I had the opportunity and saw first-hand the tremendous work done by this organization. As a member of the board together with Councillor Santos, we did a tremendous amount of community engagement and really, community engagement is really what it’s all about. Folks, when we talk about community engagement, Brampton Focus and

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Neighborhood Watch – they’re the real deal. They are the ones who recognize that there is a tremendous void in the City of Brampton with respect to media and particularly with Neighborhood Watch, there’s a deep need by members of the community to be able to organize and to take charge of their neighborhoods to enhance the safety of their neighborhoods and their homes and also in working together. I can’t say enough how proud we are of the work that Brampton Focus and Neighborhood Watch has done. When we hear ... [inaudible] ... and want the community to step up and to engage and to make Brampton a better City, I can’t think of many more examples that are better than what Brampton Focus has done through their media work and of course through Neighborhood Watch. So, as you know guys, you have my full support and I look forward to the motion from the Mayor and look forward to listening to other comments from members of Council. Thank you. Good work.

Mayor Brown: *Okay. Councillor Santos?*

Councillor Santos: *Thank you to you Mr. Mayor. Brampton Focus, Neighborhood Watch – thank you so much for coming to present today. I echo Councillor Vicente’s comments. Incredibly proud to see you here as a former board member and co-founder as well of Neighborhood Watch Brampton. I want to say that, just to add to what Councillor Vicente said, that specifically Don and Fazal – you persevered. I remember the past few years... **we’re no longer Board members. We stepped down before the election, don’t worry [laughs]** and I remember at various meetings, the frustration around the nay-sayers. Around Neighborhood Watch Brampton and Brampton Focus, but the both of you in particular, in support with the Board members, persevered. And now, you are here and you have absolutely proven the importance and significance of this grassroots organization in our City. So incredibly proud.”*

Based on the above, I find that both Councillors Vicente and Santos declared their involvement in Brampton Focus during the City Council meeting and Councillor Santos further clarified that they were no longer Board members of same. Although Councillor Santos was not explicitly listed under this allegation by the Complainant, I also find that she tendered her resignation from Brampton Focus on December 22, 2017, which I attach hereto as **Appendix “27”**.

- e) **Lack of transparency respecting the business of Brampton Focus, its ability to render the services that the City provided funding for, and the relationship between Brampton Focus and the City.**

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On the basis of documentary evidence, I do not find that there was lack of transparency respecting Brampton Focus, its ability to render services that the City provided funding for, and the relationship between Brampton Focus and the City.

Brampton Focus has been clear and transparent with respect to the services it provides and has marketed itself to the public and City Council in various ways. For example, Brampton Focus delegated at the City Council meeting on May 8, 2019 and delivered a detailed slide deck during the meeting, a copy of which I attach hereto as **Appendix “28”**. The slide deck clearly stipulated the services Neighborhood Watch provides as well as information regarding Brampton Focus (refer to slides 3 and 8-12 in **Appendix “28”**).

The 19-page report which was prepared by Brampton Focus as a follow-up from the May 8, 2019 City Council meeting (attached as **Appendix “2”**) included a detailed summary of Brampton Focus, Neighborhood Watch, the history of Neighborhood Watch, and a proposal for the City with a metrics chart and annual forecasts (page 16 of report).

In addition to the above-noted materials, once the funding was voted upon by City Council, Brampton Focus also provided a “6 Month City-Wide Rollout Plan” to the City with specific uses of the funding, as well as a 6-month cost and deliverables schedules (attached as **Appendix “7”**).

Evidently, there were various documents that both Brampton Focus and the City prepared and exchanged, which clearly identified the nature of Brampton Focus as a business, and Neighborhood Watch Brampton as a program. Mr. McLeod and Mr. Khan also delegated for a lengthy period of time at the City Council meeting on May 8, 2019 and answered Council’s questions openly and candidly on July 10, 2019. Both of those meetings were public and video recordings of those meetings are readily available online on YouTube.

Further, I note that Brampton Focus has historically had a relationship with the City. Neighborhood Watch was previously a program that operated under Brampton Safe City Association, which was partially a City-funded program. I attach a presentation hereto as **Appendix “29”** by Brampton Safe City Association from 2015, which was submitted to City Council and which references the Neighborhood Watch program.

While the historical relationship that Brampton Focus has had with Neighborhood Watch may be perceived by some as instigating a positive bias by the City towards Brampton Focus and certainly was suggested by the Complainant, I do not find this to be the case. Brampton Focus has experienced its share of ups and downs in dealing with the City and City Council. In fact, Mr. Khan had requested funding for Neighborhood Watch previously in 2018, which was denied by City Council. Following this, on February 27, 2018, Mr. Khan filed an informal complaint, alleging that the City had a bias against Neighborhood Watch. I attach a copy of the complaint by Mr. Khan hereto as **Appendix “30”**.

10.2-16

During the investigative interviews, it also became evident to me that Brampton Focus was not always on good terms with City Council. For example, one Councillor stated:

“Don McLeod said at a meeting right after election that they are forming Brampton Focus to hold Councillors accountable and that they’re not going away. “You will see us at the next election”, they said.

The LRT debate solidified their non-support of Council members. They fought very very hard against our Council who turned down the LRT originally...”

Overall, it is my view that there was no positive bias towards Brampton Focus by the City and that Brampton Focus had been persistent in trying to obtain funding from the City (after previously being denied funding) in operating Neighborhood Watch and has been in communication with the City for at least two years regarding same.

f) The decision to provide funds to Brampton Focus disallowed a competitive process to take place.

I do not find that the City’s decision to fund Brampton Focus disallowed a competitive process to take place.

Through the investigative interviews, the following two facts became clear to me:

- 1) That City Council relied on the advice of the CAO and City Solicitor at the time; and
- 2) That Neighborhood Watch Brampton is the only program of its kind in Brampton.

I include transcript excerpts from my interviews with Councillors directly below, which confirm the above-noted facts.

City Council relied on the advice of the CAO and City Solicitor at the time:

Integrity and Ethics Commissioner: you remember a discussion with the CAO with respect to why Council members wouldn’t have adhered to a competitive bidding process?

Councillor: Yes.

Integrity and Ethics Commissioner: And the CAO was saying what about that?

Councillor: I took their word for it that it was all in the confines of the regular process and that we had discretion to do that.

Integrity and Ethics Commissioner: You took their advice?

10.2-17

Councillor: Essentially.

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Integrity and Ethics Commissioner: What's your understanding of why Brampton Focus was not selected through a competitive bidding process?

Councillor: We passed a budget for communications last term. And from my understanding, staff directed us that this doesn't need to go through Request for Proposals ("RFP").

I didn't ask the question, but other councillors asked the question about the RFP. They asked it to our treasury, acting CAO at the time, and James McIntyre (Purchasing By-law guy) and I'm not sure if legal had an opinion (Denis Squires). Denis Squires is good. He gives very good advice. If I heard that there was no need for RFP from Denis or James, I would be satisfied, and I was.

--

Councillor: I remember him saying we can do this. Nobody else is doing Neighborhood Watch Brampton. The acting CAO, Joe Pittari, at the time said it was okay.

--

Councillor: Joe Pittari said there's nothing out of the ordinary about this, and I said okay.

Neighborhood Watch Brampton is the only program of its kind in Brampton:

Councillor: These guys been here 5 years. Everyone knows them. There is no one else there. Everyone knows Brampton Focus. I figured, you know what, it's a great idea. They did a lot of things for free for the last 5 years.

--

Integrity and Ethics Commissioner: Is there anyone that does work like

Neighborhood Watch in Brampton?

Councillor: No.

--

10.2-18

Councillor: Brampton Focus has been doing Neighborhood Watch for the last couple years. They came for funding a couple of years ago and we told them to come back with a plan.

--

Integrity and Ethics Commissioner: In your mind, why was it not appropriate for there to have been a bid so that other businesses could compete?

Councillor: My father was politician for 35 years. I have never had anybody, but Brampton Safe City do that kind of work. They no longer do the work because their funding was cut in 2015 budget.

Integrity and Ethics Commissioner: You do understand there's a competitive bidding process?

Councillor: Yes.

Integrity and Ethics Commissioner: Why would it not have been appropriate for there to be a bid? I'm understanding that there would have been no one doing work like Neighborhood Watch?

Councillor: Yes.

Relying on the above-noted references from my interviews with City Council, it is evident that Council did not disallow a competitive process by funding Neighborhood Watch through Brampton Focus because Neighborhood Watch is the only program of its kind in Brampton (hence, there are no competitors offering the same program). The Complainant also did not mention any specific organizations in Brampton that offer services similar to that of Neighborhood Watch. Although the Complainant provided names of three individuals during the investigative interview, it is not my view that those individuals provide services akin to that of Neighborhood Watch. Overall, Councillors were assured by the appropriate authorities during the City Council meeting on July 10, 2019 that a competitive process was not required.

City Council Meetings (May 8, 2019 and July 10, 2019)

I have reviewed the transcripts of both City Council meetings, which occurred on May 8, 2019 and July 10, 2019.

I will outline the key findings from the two City Council meetings directly below.

10.2-19

May 8, 2019 City Council Meeting:

During this meeting, Mr. McLeod and Mr. Khan delegated to Council, and a discussion followed after that.

A brief summary of the discussion is as follows:

- Councillor Vicente stated that he was a proud founder of Brampton Focus back in 2015.
- Councillor Vicente said that he was a member of Brampton Focus' Board together with Councillor Santos.
- Councillor Santos said that she was a former Board member and that they are no longer Board members. Specifically, she stated, "we stepped down before the election, don't worry".

July 10, 2019 City Council Meeting:

During this meeting, there was a discussion involving Councillors, Mr. McLeod, Mr. Khan, the City Solicitor, and City staff.

A brief summary of the discussion is as follows:

- Councillor Bowman raised issues with the City giving \$150,000 to Brampton Focus without Brampton Focus presenting any itemized budget. He inquired about how the budget would be allocated. For example, what would be the breakdown of salaries, rent, advertising, printing. He also said that he "can't support giving \$150,000 away without knowing what the budget is and how that money is going to be spent". Councillor Bowman stated that he "would like to see that dollar figure removed until such time as we get a report back from your meeting". City staff's response to Councillor Bowman was that the budget would be delineated once there was a workshop with Brampton City. Councillor Bowman asked when the workshop would be and staff responded that "it's pending council approval and it could be in the fall".
- Councillor Williams asked about whether this should go through a competitive bidding process and whether an RFP is required as per the Purchasing By-law. The response from Corporate staff was that they are required to go through a competitive process however, there are conditions that would allow for the City to do a sole-source contract. City Staff explained that the funding was to be a pilot

10.2-20

program for 6-months, after which, Brampton Focus' progress would be evaluated, and the City would decide whether to continue the funding.

- Councillor Palleschi brought up the fact that the City historically funded Brampton Safe City and ultimately ended up feeling like they did not have control of where the funds went. Brampton Safe City collapsed, and the City discontinued their funding at that time. Councillor Palleschi echoed Councillor Bowman's query about where the dollars are going.
- There was an amendment to the motion to include the wording "up to" before \$150,00 so that it read: "should council direct staff to proceed and based on the request from Brampton Focus and Neighborhood Watch Brampton, **up to** \$150,000 be allocated".
- Eventually, all Councillors voted in favour of funding Brampton Focus/Neighborhood Watch.

Both City Council meetings are publicly available on YouTube.

Issues and Analysis

Based on the Complaint filed with my office, the Complainants allegations fall under four broad categories:

1. Whether Brampton Focus breached the Lobbyist Registry By-law (149-2015);
2. Whether the City beached the Purchasing By-law (19-2018);
3. Whether Councillor Vicente and Councillor Santos breached the *Municipal Conflict of Interest Act*; and
4. Whether City Councillors and the Mayor violated the Code of Conduct by voting in favor of providing to Brampton Focus in the amount of \$150,000.

I will deal with each issue in turn.

1. Whether Brampton Focus breached the Lobbyist Registry By-law (149-2015).

The Lobbyist Registry By-law governs lobbyist activities in the City to provide transparency and oversight with respect to lobbyists. Further, it permits the City to establish and maintain a Lobbyist Registry (section 223.9 of *Municipal Act, 2001*), which allows the City to keep track of lobbyists, appoint a Lobbyist Registrar (section 223.11 of *Municipal Act, 2001*), and allows the Lobbyist Registrar to delegate powers and duties (section 23.1 and 23.2 of *Municipal Act, 2001*). I attach the relevant sections of the *Municipal Act, 2001* hereto under **Appendix "31"**.

10.2-21

The underlying purpose of the Lobbyist Registry By-law is to disallow people from lobbying the City without first registering in the Lobbyist Registry. I attach a copy of the Lobbyist Registry By-law hereto as **Appendix “32”**. A person intending to lobby may register prior to their first lobbying communication, and, in any case, must register no later than five business days after lobbying communication has commenced (section 17 of Lobbyist Registry By-law).

The City has appointed me as its lobbyist registrar pursuant to 223.11 of the *Municipal Act, 2001*, requiring me to perform functions assigned by the City pertaining to the Lobbyist Registry. My specific duties as the City’s Lobbyist Registrar are outlined in section 13 of the Lobbyist Registry By-law. Part of my responsibilities as the Lobbyist Registrar include, but are not limited to:

- Overseeing the establishment/administration of the Lobbyist Registry;
- Enforcing the Lobbyist Registry By-law; and
- Providing advice, opinions and interpretation pertaining to the administration, application, and enforcement of the Lobbyist Registry By-law.

Pursuant to the above-noted provisions in the *Municipal Act, 2001*, it is both within my mandate and jurisdiction to assess whether Brampton Focus breached the Lobbyist Registry By-law. Section 16 of the Lobbyist Registry By-law states as follows:

“No person shall lobby a public office holder without being registered as required under this part unless otherwise exempted under part IV”.

The term “lobby” means “any communication with a public office holder by an individual who represents a business or financial interest with the goal of trying to influence any legislative action”. Further, the Lobbyist Registry By-law defines “legislative action” to mean “all actions by Council or through its authority, including, but not limited to the:

- I. development, introduction, passage, defeat, amendment or repeal of a By-law, motion or resolution;
- II. development, approval, amendment, application or termination of a City policy, program, directive, grant or guideline;
- III. outcome of a decision on any matter before Council, a committee of Council or a ward Councillor or staff member acting under delegated authority; or
- IV. the purchase of goods, services or construction and the award of a contract by the City.”

Based on the definition of lobbying as noted above, as well as a person’s obligation as outlined in section 16 of the Lobbyist Registry By-law, I find that Brampton Focus’ communication with the City constitutes “lobbying”.

10.2-22

The term “public office holder” is defined in the Lobbyist Registry By-law to include “a member of Council and any person or his or her staff” and “an officer or employee of the City”.

In the “Documentary Evidence and Findings of Fact” section of this Report, I found that Brampton Focus was not a registered lobbyist when it was communicating with City Councillors and City staff. Nevertheless, with respect to communications between Brampton Focus and City staff between May 8, 2019 and July 10, 2019, I find that the exemption under 12.(e) ii. and 12.(f) i. apply. Specifically, I find that City staff was acting on Council’s direction to report back to the committee of Council by June 12, on:

- 1) partnerships to expand Neighborhood Watch City wide, and
- 2) opportunities to utilize Brampton Focus with the City’s corporate communications to advance City messaging similar to techniques utilized in Mississauga.

The two items mentioned directly above were resolution “C150-2019”, reflected in the meeting minutes of the May 8, 2019 City Council meeting, which are attached at **Appendix “1”**.

As such, if the communication between City staff or Councillors occurred for the purposes of implementing and administering the direction from City Council in C150-2019, then such communication is exempt from being deemed as lobbying. In other words, if the communication occurred during the process of City staff developing a response (i.e. the report attached at **Appendix “2”**) to C150-2019, then this would not be considered lobbying. Hence, I do not find the communication between Brampton Focus and the City wherein the 6-month Implementation Plan or the 19-page report prepared by Brampton Focus was exchanged to be “lobbying”.

Nevertheless, I do find the communication between Brampton Focus and the City (staff and Council) which occurred outside of preparing for the report (such as the communication reflected via Appendices “4”, “5”, and “15”), to be lobbying without registration.

2. Whether the City beached the Purchasing By-law (19-2018).

My role under section 223.3 of the *Municipal Act, 2001* generally consists of overseeing the application of the Code of Conduct, City By-laws, rules, procedures and policies which govern the ethical conduct of Council members. It is strictly outside of my purview to determine what is illegal or to find a breach of a City By-law, which is unrelated to the Code of Conduct. Section 223.3 of the *Municipal Act, 2001* is included under **Appendix “31”**.

To be clear, it would make little sense for me to opine on the enforceability, legality, or applicability of a general By-law that is unrelated to the Code of Conduct. The City has, at its disposal City staff, City solicitors, a By-law Enforcement office, and the ability to

10.2-23

retain external counsel to render an opinion on whether Council breached the Purchasing By-law.

It is outside of my jurisdiction to opine on whether the City breached the Purchasing By-law or to provide an interpretation of same. Under section 2(3) of the Complaint Protocol (attached hereto as Appendix “33”), I am fulfilling my obligation to Council by reporting that this particular issue is not within my jurisdiction and mandate. It may be an appropriate question for the City’s By-law Enforcement office.

3. Whether Councillor Vicente and Councillor Santos breached the *Municipal Conflict of Interest Act*.

The *Municipal Conflict of Interest Act* highlights the importance of integrity, independence, and accountability in government decision-making. If a member of Council has any pecuniary interest (direct or indirect) in a matter and is present at a Council meeting where the matter is being considered, then that member has to do the following: prior to the consideration of the matter, that member has to disclose his or her interest and shall not take part in the discussion or vote on any question in relation to that matter. The member cannot even influence the voting on that matter.

A member is considered to have an “indirect” pecuniary interest in a matter where the member is a shareholder or a Director of a non-share corporation, or, has a controlling interest in the Director or Senior Officer of a corporation with public shares.

Under section 223.3 the *Municipal Act, 2001*, my role as the City’s Integrity and Ethics Commissioner requires me to apply relevant sections of the *Municipal Conflict of Interest Act* to members of Council. Such sections include sections 5, 5.1 and 5.2 of the *Municipal Conflict of Interest Act*, which I attach hereto as **Appendix “34”**, and which I will now analyze and assess in light of the Complaint.

The purpose of the *Municipal Conflict of Interest Act* is to protect the public interest by prohibiting members from being involved in matters that are being considered by Council or local board if the member has a pecuniary interest in the matter.

The legislative purpose of the *Municipal Conflict of Interest Act* is “to prohibit any vote by someone who has a pecuniary interest in the matter to be considered and voted upon. It is only by strict observance of this prohibition that public confidence in municipal councils and local boards, including school boards, will be maintained.”¹

Section 5 of the *Municipal Conflict of Interest Act*, requires that where a member has **direct or indirect pecuniary interest** in a matter and is **present at Council meeting** at which the matter is the subject of consideration, the member shall:

¹ *Cauchi v. Marai*, 2019 ONSC 497 at para 30.

10.2-24

- prior to any consideration of the matter at the meeting, **disclose** the interest and the general nature thereof;
- **not take part in the discussion** of, **or vote** on any question in respect of the matter; and
- **not attempt in any way** whether before, during or after the meeting **to influence the voting** on any such question.

Further, section 5.1 requires that at a meeting at which a Council member **discloses an interest** under section 5, or as soon as possible afterwards, the member **shall file a written statement** of the interest and **its general nature** with the clerk of the municipality or the secretary of the committee or local board, as the case may be.

Section 5.2 requires that where a member, either on his or her own behalf or while acting for, by, with or through another, has any **direct/indirect pecuniary interest**, in any matter that is being considered by an officer or employee of the municipality or local board, or by a person or body to which the municipality or local board has delegated a power or duty, the member **shall not** use his or her office in **any way to attempt to influence** any decision or recommendation that results from consideration of the matter.

Although “pecuniary interest” is not defined in the *Municipal Conflict of Interest Act*, it has been “held to be a financial, monetary or economic interest; and is not to be narrowly defined.”²

Moreover, “pecuniary interest” must be “definable and real with the potential to affect the interests of the member and not simply a hypothetical or speculative interest.”³

Courts have also held that given the severe penalties associated with individuals having conflicts of interests, “it is appropriate to strictly interpret the pecuniary interest threshold.”⁴

“The term “direct pecuniary interest” is also not defined in the *Municipal Conflict of Interest Act*. However, judges have given a plain and ordinary meaning to the term and concluded that “it must refer to a situation in which the **member could experience an immediate, in the sense of close, non-deviated or traceable financial or economic impact, positive or negative.**”⁵

The term “indirect pecuniary interest” is defined under section 2 of the *Municipal Conflict of Interest Act*:

“For the purposes of this Act, a member has an indirect pecuniary interest in any matter in which the Council or local board, as the case may be, is concerned, if,

² *Davidson v. Christopher* (2017), 2017 ONSC 4047, (Ont. S.C.J.) at para 17.

³ *Cauchi v. Marai*, 2019 ONSC 497 at para 33.

⁴ *Magder v. Ford*, 2013 ONSC 263 at para 43.

⁵ *COOPER ET AL. v. WIANCKO ET AL.* (2018), 2018 ONSC 342 (Ont. S.C.J.) at paras 62-63.

10.2-25

- (a) the member or his or her nominee
- (i) is a **shareholder in, or a director** or senior officer of, a **corporation that does not offer its securities to the public**,
 - (ii) has a **controlling interest** in or is a **director or senior officer** of, a **corporation that offers its securities to the public**, or
 - (iii) is a **member of a body**,
 - that has a **pecuniary interest in the matter**; or
- (b) the member is a partner of a person or is in the employment of a person or body that has a pecuniary interest in the matter.”

As was noted in the “Documentary Evidence and Findings of Fact” section of this Report, I do not find that Councillor Vicente and Councillor Santos were on the Board of Brampton Focus at the time that the matter of funding Brampton Focus was considered and voted on by Council.

If Councillor Santos and Councillor Vicente were existing Board members of Brampton Focus between May 8, 2019 and July 10, 2019, I would find that to be an issue since they would be deemed as having an “indirect pecuniary interest” in a matter being discussed and voted on due to section 2(a) (ii) of the *Municipal Conflict of Interest Act*.

I also do not find Councillor Santos or Councillor Vicente to have had any “direct pecuniary interest” in Brampton Focus at the time the funding was discussed and voted upon by Council. Further, my finding that Brampton Focus was not operating out of a home owned by Councillor Vicente further undermines that he had any direct or indirect pecuniary interest in Brampton Focus.

Overall, I do not find that Councillor Vicente and Councillor Santos profited or sought an unfair benefit in participating in the vote to fund Brampton Focus, since they did not have a pecuniary interest in same (direct or indirect).

It is expected that members of Council, as elected individuals who are involved in the community, would have been involved in various groups and/or organizations. This does not mean, however, that if a Council member has had any involvement in the past with a particular organization, that he or she will be barred from participating in any vote pertaining to that entity, despite no longer being a part of that entity. I find that to be both unrealistic and impractical. The verbiage in section 5 of the *Municipal Conflict of Interest Act* and the usage of the words “where a member **has** direct or indirect pecuniary interest in a matter” clearly suggests that the question to ask is: does a member of Council *currently* have a direct or indirect pecuniary interest in a matter?

4. Whether City Councillors and the Mayor violated the Code of Conduct by voting in favor of granting Brampton Focus \$150,000.

10.2-26

Section 223.3(1) assigns me the responsibility of applying the Code of Conduct to Council.

The key *purposes* of the Code of Conduct are:

- To ensure that City of Brampton decisions and policy are made through the proper processes of municipal government structure;
- To ensure public office is not be used for personal gain; and
- To instill and maintain public confidence in the integrity of its municipal government.

The underlying *principles* of the Code of Conduct are that:

- Members of Council shall serve and be *seen* to serve their constituents in a conscientious and diligent manner;
- Members of Council should be committed to performing their functions with integrity and transparency; and
- Members of Council shall perform official duties and arrange their public affairs in a manner that promotes public confidence and respect and will bear close public scrutiny.

Although the Complainant only explicitly references rule 4 of the Code of Conduct, the relevant rules that would apply in relation to the allegations in the Complaint are as follows:

1. Rule No. 2 – Gifts and Benefits;
2. Rule No. 9 – Transparency & Openness in Decision Making and Member’s Duties; and
3. Rule No. 18 – Failure to Adhere to Council Policies and Procedures.

A copy of the above-mentioned rules is attached hereto under **Appendix “35”**.

1. Rule No. 2

Did the Councillors and Mayor Brown accept a personal benefit or gift from Brampton Focus connected with the performance of their duties of Office?

There are two parts to rule no. 2 of the Code of Conduct.

Firstly, that no member shall accept any gift or personal benefit related to the performance of his or her duties unless it is covered by one of the exceptions in the rule. Secondly

10.2-27

members must disclose in the Gift Registry all gifts or benefits received with a value of \$50 CAD or more.

The Gift Registry may be located via the following link: <https://www.brampton.ca/EN/City-Hall/Lobbyist-Gift-Registries/Pages/Welcome.aspx>

Respecting the first part of rule no. 2, in light of my finding of fact, there is no evidence to suggest that the Respondents received a gift or personal benefit from Brampton Focus connected with the performance of their duties. The Complainant specifically raised issue with video coverage of certain Councillors at the Canada Day event at Chinguacousy Park. However, the invoice attached at **Appendix “17”** clearly indicates that such coverage was not a gift or personal benefit.

The Complainant also raised that Brampton Focus “provided in-kind gifts of recording and broadcasting advertorial interviews as part of their lobbying effort”. The Complainant stated that the advertorial work has been valued at “up to \$150,000”.

Aside from the Canada Day advertorial coverage, the Complainant also included screenshots of advertorials by Brampton Focus covering promotions by certain Councillors of City events.

One of the exemptions under rule no. 2 is:

“1 (b) such gifts or benefits that normally accompany the responsibilities of office and are received as an incident of protocol or social obligation”

I find that providing advertorial interviews and media coverage is not a “gift” or “benefit” under rule no. 2. However, even if it were to be considered a “gift” or “benefit”, it is one that I find to normally accompany the responsibilities of office and would be incidental to Council members’ social obligation of attending social events and being involved in public gatherings.

I find that the Councillors and Mayor Brown did not contravene rule no. 2 of the Code of Conduct in participating in interviews with Brampton Focus, just as they do with other media outlets. Since I find that the alleged “in-kind gifts” were *not* in fact gifts or benefits under rule no. 2, there was no need for Councillors or Mayor Brown to register same.

3. Rule No. 9

Did the Councillors and Mayor Brown conduct and convey Council business in an open and transparent manner so that stakeholders could view the process and rationale used to reach decisions, and the reasons for taking certain actions?

The purpose of this rule is to ensure that members of Council, who are elected officials, may clearly identify to the public how a decision was reached and upon which law,

10.2-28

procedure and policy their decision was based. It is to ensure transparency and openness in decision making by public officials.

Based on the Appendices listed under the “Documentary Evidence and Findings of Fact” section, it is evident that Brampton Focus was clear and transparent in the services it renders, as well as with respect to the Neighborhood Watch program. I also refer back to the historical relationship between Brampton Focus and the City and the transcript excerpts from my interviews with Councilors, through which the process and rationale used to reach the decision of funding Brampton Focus is evidenced.

I find that Council conducted itself in an open and transparent manner and had a lengthy discussion during both City Council meetings, through which it satisfied itself that a competitive process was not needed and that even if there was such a process, Neighborhood Watch was the only program that offered the services of its kind.

4. Rule No. 18

Did the Councillors and Mayor Brown fail to adhere to By-laws, policies and procedures adopted by Council that are applicable to them?

Rule No. 18 of the Code of Conduct obliges members to adhere to By-laws, policies and procedures adopted by Council that are applicable to them.

While I cannot opine on the Purchasing By-law for reasons mentioned in the “Documentary Evidence and Findings of Fact” section, I can opine on whether the Respondents failed to adhere to the Lobbyist Registry By-law.

Pursuant to section 2 of the Lobbyist Registry By-law, which states as follows, the Lobbyist Registry By-law is applicable to public office holders:

“2. The Lobbyist Registry By-law applies to all public office holders in the City of Brampton, subject to the exemptions noted in Part IV of the Lobbyist Registry By-law.”

“Public office holder” includes “a Member of Council and any person on his/her staff” as well as “an officer or employee of the City” under sections 5(k) i. and ii. of the Lobbyist Registry By-law.

Based on my reasoning under “1.” of the “Issues” section, and the documentary evidence considered in the “Documentary Evidence and Findings of Fact” section, I find that Council failed to adhere to the Lobbyist Registry By-law by communicating with Brampton Focus members outside of preparing for the report or outside of communication during a public process (public meeting, hearing consultation, open house or media event held or sponsored by the City).

10.2-29

Under section 14 of the Lobbyist Registry By-law, members of Council and City staff have a positive obligation to advise lobbyists of the requirements to register with the Lobbyist Registry at the start of lobbying activities. **I find that City staff and members of Council did not seriously consider this responsibility. Members of Council and City staff should have ensured that Brampton Focus was a registered lobbyist and if not, should have taken the further step of advising Brampton Focus of the requirement to register in the Lobbyist Registry.**

Conclusion

Overall, I find that City Council needs to be more vigilant in encouraging adherence to the Lobbyist Registry By-law, especially given that the Lobbyist Registry By-law requires Council and City staff to advise lobbyists of registry requirements.

Given that there was no official written contract between the City and Brampton Focus outlining the terms and conditions of the funding, I would recommend that going forward, Council consider the need and importance of official funding contracts. Nevertheless, as mentioned, there were multiple documents presented by both City Council and Brampton Focus in the case at hand, wherein the nature of the grant, the deliverables, and the use of the funding were expressly stipulated. A more standard document used for officializing funding relationships between the City and grant recipients may serve as a more feasible option going forward.

Sincerely,



Muneeza Sheikh
Integrity Commissioner
City of Brampton

I would like to acknowledge my colleague, Saba J. Khan, for assisting me in investigating this Complaint and in preparing this Report.

APPENDICES

10.2-31

**APPENDIX "1": Relevant pages from Agenda and Meeting Minutes for City
Council Meeting on May 8, 2019**

- 11.2. **Minutes – Committee of Council – May 1, 2019**
Chairs: Regional Councillor Dhillon, Economic Development and Culture Section
City Councillor Singh, Corporate Services Section
Regional Councillor Vicente, Public Works and Engineering Section
Regional Councillor Santos, Community Services Section

To be approved

12. Unfinished Business

13. Correspondence

- * 13.1. Correspondence from Carey Herd, Town Clerk, Town of Caledon, dated May 1, 2019, re: **Town of Caledon Resolution - Regional Government Review**

To be received

14. Resolutions

15. Notices of Motion

16. Petitions

17. Other Business/New Business

17.1. **Referred Matters List**

Note: In accordance with the Procedure By-law and Council Resolution, the Referred Matters List will be published quarterly on a meeting agenda for reference and consideration. A copy of the current Referred Matters List for Council and its committees, including original and updated reporting dates, is publicly available on the City's website.

- 17.2.) Discussion Item at the Request of Mayor Brown re: **Neighbourhood Watch**.

18. Procurement Matters

10.2-33

The following motion was considered.

C148-2019 Moved by Regional Councillor Santos
Seconded by City Councillor Williams

1. That the staff presentation by J. Holmes, Director, Capital Works, Public Works and Engineering, to the Council Meeting of May 8, 2019, re: **Certificate of Recognition (COR)**, be received; and,
2. That the report from J. Holmes, Director, Capital Works, Public Works and Engineering, to the Council Meeting of May 8, 2019, re: **Certificate of Recognition (COR) Update**, be received.

Carried

7.2. Delegations and Presentation from Don McLeod and Fazal Khan, Brampton Focus, re: **Item 17.2 – Neighbourhood Watch**.

Don McLeod and Fazal Khan from Brampton Focus provided a presentation outlining information on Neighbourhood Watch Brampton and Brampton Focus.

C149-2019 Moved by Mayor Brown
Seconded by Regional Councillor Santos

That the delegations and presentation from Don McLeod and Fazal Khan, Brampton Focus, to the Council Meeting of May 8, 2019, re: **Item 17.2 – Neighbourhood Watch**, be received.

Carried

C150-2019 Moved by Mayor Brown
Seconded by Regional Councillor Santos

That staff report back to Committee of Council by June 12th on the feasibility of:

- 1) partnerships to expand Neighbourhood Watch city-wide, and
- 2) opportunities to utilize Brampton Focus with the City's Corporate Communications to advance City messaging similar to techniques utilized in Mississauga.

A recorded voted was requested and the motion carried as follows:

<u>Yea</u>	<u>Nay</u>	<u>Absent</u>
Dhillon	nil	Fortini
Singh		
Williams		
Medeiros		
Brown		
Bowman		
Palleschi		
Whillans		
Vicente		
Santos		

Carried
10 Yeas
0 Nays
1 Absent

8. Reports from the Head of Council – nil

9. Reports of Corporate Officials

Office of the Chief Administrative Officer

- * 9.1. Report from J. Pittari, Acting Director, Human Resources, dated April 18, 2019, re: **Salary Administration Policy: 2018 Semi-Annual Reporting – July 1st to December 31st 2018.**

Dealt with under Consent Resolution C145-2019

- 9.2. Report from P. Fay, City Clerk, dated April 26, 2019, re: **Housekeeping Changes to Administrative Monetary Penalty System (AMPS) By-law and Screening Officer and Hearing Officer By-law.**

See By-laws 90-2019 and 91-2019

The following motion was considered.

C151-2019 Moved by City Councillor Whillans
Seconded by City Councillor Bowman

1. That the report from P. Fay, City Clerk, dated April 26, 2019, to the Council Meeting of May 8, 2019, re: **Housekeeping Changes to**

**APPENDIX “2”: Report Prepared by City Staff on the Feasibility of Partnerships
to Expand Neighborhood Watch (dated May 9, 2019)**



BRAMPTON
Flower City

Report
City Council
The Corporation of the City of Brampton
2019-07-10

Date: 2019-05-09

Subject: Feasibility of: Partnerships to expand Neighbourhood Watch City-wide, and Opportunities to Utilize Brampton Focus with the City's Corporate Communications to Advance City Messaging (RM 57/2019)

Contact: Jason Tamming, Director, Strategic Communications
Razmin Said, Advisor, Fire and Emergency Services

Recommendations:

1. That the report from Jason Tamming, Director, Strategic Communications and Razmin Said, Advisor, Brampton Fire and Emergency Services, dated June 19, 2019, to the City Council Meeting of July 10, 2019, re: **Brampton Focus and Neighbourhood Watch Brampton Expansion Partnership – All Wards** be received; and
2. That should Council direct staff to proceed and based on the request from BF/NWB, \$150,000 be allocated from capital project #192111 – Community Safety Project to fund the 6 month expansion of the Neighbourhood Watch Program managed by Brampton Focus; and ✓
3. Based on the successful partnership of Safe City Mississauga and Peel Regional Police, that Council encourage Brampton Focus to continue to collaborate with the Peel Regional Police on the expansion of the Neighbourhood Watch program; and ✓
4. That Brampton Focus actively search and attain alternative sources of funding to reduce the reliance on City funds in future years to ensure a sustainable Neighbourhood Watch program; and ✓
5. That Strategic Communications partner with Brampton Focus, where applicable, to provide video creation and content services, and ensure the outlet proactively receives the City's communications to share across their social channels as a means to improve community safety. ✓

Overview:

- A healthy and safe city has been identified as a 2018-2022 Term of Council priority, which is facilitated by strong community partnerships in order to improve community safety and the resulting improved perceptions of residents.

- Should Council approve, staff propose a multi-faceted program to facilitate the expansion of the Neighbourhood Watch Brampton program across the City of Brampton.
- Should Council approve, staff (Fire, Strategic Communications) will collaboratively organize to assist with the enhancement of the Neighbourhood Watch Brampton program.

Background:

At the May 8, 2019 Council meeting, through a discussion item from Mayor Brown, a delegation from Don McLeod and Fazal Khan led to a motion involving both Brampton Focus (BF) and Neighbourhood Watch Brampton (NWB). The motion has directed staff to explore possible expansion of the NWB program city-wide through leveraging partnerships as well as exploring opportunities to utilize Brampton Focus to advance City messaging.

Though Brampton Focus is the parent organization of Neighbourhood Watch Brampton and are separate in their functions, their operations are at times parallel. This report will address the following matters:

Brampton Focus

Brampton Focus launched in 2015 as a community group and incorporated in September 2016. The City sends BF official City Media Releases, Service Information Updates, Media Advisories and other media event invitations. During media events, the City has assisted BF with on-site tech requirements and interview requests.

Neighbourhood Watch Brampton

Neighbourhood Watch Brampton was established in July 2016 under the management of Brampton Focus. In late 2017, NWB approached the City to authorize the creation and location of signage; after a thorough assessment, a staff report to the Brampton Community Safety Advisory Committee suggested that NWB explore other funding sources. The Community Grants program does not currently facilitate the capital asks for signage that would be required.

In May and June of 2019, City staff met with representatives from Brampton Focus to gain a better understanding of their programs. Their proposed partnership included a recurring annual financial ask of \$300,000 for the expansion of the Neighbourhood Watch Brampton program as well enhancement of their current Brampton Focus capabilities.


Current Situation:***Brampton Focus***

Strategic Communications has not advertised with Brampton Focus. Strategic Communications is engaging Brampton Focus to provide video content and livestreaming support for Canada Day. Strategic Communications shares social media, photo and videos, and media release content with a range of Brampton media outlets that have signed up to receive this content.

Neighbourhood Watch Brampton

The problem oriented policing concept of the Crime Triangle states three factors that contribute to the occurrence of a crime: *desire* of a criminal to commit the crime, *target* of the criminal's desire, and the *opportunity* for the crime to be committed. Standard neighbourhood watch programs focus on addressing the opportunity factor by preventing and reducing property crimes through education and enhancing neighbourhood connections. This form of participatory policing aimed at neighbourhood crime prevention has both positive and negative outcomes. Interpersonal surveillance may cause increased feelings of anxiety for those individuals that are not comfortable with extroverted interactions. On the contrary, increased interpersonal surveillance may also promote a collective culture of looking out for each other.

After research and analysis, staff have taken into account the different variations of neighbourhood watch programs to assess how to proceed. Safe City Mississauga has operated Mississauga's Neighbourhood Watch Program since 1992; it is now one of the three main programs they actively manage. Their program uses a researched based approach with a focus on mobilizing neighbourhoods into becoming active and engaged communities, unified in crime prevention and safety. Safe City Mississauga's partnership with the University of Toronto Mississauga have allowed them to access and incorporate the latest research on criminology and socio-legal developments and trends. Mississauga Safe City also has a strong working relationship with Peel Regional Police, which has allowed the Neighbourhood Watch program to grow.

Staff Proposal – Pilot NWB Expansion Project

After consulting with Brampton Focus and assessing the feasibility of a partnership to expand NWB citywide, staff propose a multi-stage approach to exploring the expansion of the NWB program across the City. A pilot of the expansion of the NWB program will allow an opportunity to assess the outcomes and metrics of the NWB program before making any long-term financial and resource commitments.

9.2-4

Pending Council discussion and approval, the proposed pilot of the NWB expansion project would include monthly staff consultations to ensure collaboration across departments and external agencies, as required, as well as \$150,000 for the remainder of the year for this pilot of the NWB expansion. This funding is based on the request from NWB in order to facilitate expanding the program city-wide.

To assist in initiating the expansion of the NWB program, one workshop for all existing Neighbourhood Captains/Advocates will be held. This workshop will allow NWB to set a path forward as well as explore options for program enhancement to inclusively meet the needs of all residents across Brampton. In collaboration with City staff and any other relevant stakeholders, such as Peel Regional Police, NWB will develop the necessary objectives and metrics to provide sufficient data for outcomes to be measured. These include:

- Identify metrics and collection methods to gauge program success;
- Evaluate engagement of advocates;
- Determine the specific NWB priorities for the expansion period; and
- Identify opportunities to increase communication and membership.

The proposed monetary investment will allow Brampton Focus to expand by hiring staff, such as a project manager, for the NWB program and funding for promotional materials (ex. newsletters), technology enhancements, event needs, administrative costs, and office supplies.

The components of the NWB expansion partnership will allow for an opportunity to evaluate and enhance the current program as well as ensure an equitable allocation of resources across the City. Should Council direct staff to proceed with the pilot expansion project, staff request BF to provide the following towards the end of the pilot expansion project:

- *Program Outcomes*
 - Increased perceptions of security and connectedness to neighbours and community, among participating members
- *Metrics*
 - Number of new participants
 - Number of new Advocates
 - Number and date of neighbourhood launches
 - Location of active neighbourhood watch groups
 - Number of Crime Prevention Through Environmental Design (CPTED) presentations administered
 - Participant survey results

To accurately capture the above metrics, it is strongly advised NWB collaborate with Peel Regional Police to the greatest extent possible to obtain property crime statistics and related information.

9.2-5

In addition, staff encourage BF/NWB to collaborate and formalize partnerships with other community and service organizations to provide a holistic solution based approach for residents. These partnerships could assist the NWB program in improving the community's perception of community safety as well as provide an opportunity to share the cost of programming. Staff recommend NWB actively search and attain alternative sources of funding to reduce the reliance on City funds in future years and to ensure a sustainable community safety program.

Staff will assist Brampton Focus to complete a report to Council in the quarter following the end of the trial period. Presuming the project expansion period begins in Q3 2019, Council can expect a report by Q2 2020.

Staff Proposal – Media Partnership

Strategic Communications proposes a one-year Brampton Focus partnership project:

- Strategic Communications to consider Brampton Focus as a video vendor for select Corporate events.
- Strategic Communications to offer Brampton Focus summer interns (funded by the Canada Summer Jobs Program) opportunities to shadow the Media and Engagement team in Strategic Communications team.
- Strategic Communications to connect with and collate feedback from Brampton Focus as part of a Mainstream Media Roadshow (similar to our Ethnic Media Roadshow)
- Recognizing the City of Brampton as one of the stakeholders committed to a Healthy and Safe City, Strategic Communications to work with Neighbourhood Watch Captains/advocates to establish an emergency communications network, to disseminate emergency information during high impact scenarios such as weather events or power outages.

Opportunities for Involvement

The talent and dedication of BF staff is recognized by the City, especially as it relates to:

- Initial engagement of residents through NWB launches;
- Rallying residents to support a worthy cause; and
- Creating content relevant to events and community concerns.

As such, City staff have requested support from BF with multiple events with the mutual goal of enhancing community engagement. In addition to the proposal mentioned above, staff are providing the following opportunities:

9.2-6

- *NWB Launch Support from Fire and Emergency Services*
Brampton Fire and Emergency Services staff will attend future NWB launch meetings to provide more information on fire safety for residents.
- *Fire and Emergency Services Blitz*
BF/NWB will be invited to film a future fire safety blitz with the Fire Chief and BFES staff personally informing residents on the importance of fire safety in their homes.
- *Brampton Community Safety Advisory Committee*
As per Council direction, one permanent member from NWB has been added to the Brampton Community Safety Advisory Committee to act as a representative and to enhance their involvement in City matters related to community safety. Staff will update the Terms of Reference to reflect this amendment.

Corporate Implications:

Financial Implications:

Sufficient funding for this initiative is available from the following source:

Project	Budget Available	Amount Requested
Community Safety Project (192111-001)	\$300,000	\$150,000

Legal Implications:

Strategic Plan:

This report achieves the Strategic Plan priorities by:

Living the Mosaic – 2040 Vision:

A healthy and safe city has been identified as a 2018-2022 Term of Council priority, which is facilitated by strong community partnerships in order to improve community safety and the inherent perceptions of community safety. As part of the Council approved strategic direction and based on Vision 2040, collaboration and input from community organizations and residents is essential to co-building a strong community. This report also advances the strategic priority of a well-run City by enabling public participation.

Conclusion:

The City acknowledges the importance of collaboration and building sustainable relationships with all levels of government, internal departments, service providers, and communities due to the intertwined nature of community safety. This partnership and expansion program engages Brampton Focus to assist in building a healthy and safe city while working to engage residents throughout Brampton to increase community involvement and awareness with intention to improve both actual and perceived community safety. Building strong connections with residents will help foster an environment of civic pride and enhance the perceptions of safety in our city.

Approved by:

Approved by:

Jason Tamming, Director,
Strategic Communications

Bill Boyes,
Fire Chief

Authored by Razmin Said, Advisor, Community Safety

10.2-44

APPENDIX "3": Relevant Pages from Meeting Minutes for July 10, 2019 City Council Meeting

8. Reports from the Head of Council – nil

9. Reports of Corporate Officials

Office of the Chief Administrative Officer

- 9.1. Report from J. Pittari, Chief Administrative Officer, dated July 4, 2019, re: **Amendment to Municipal Officials By-law 84-2008 (Acting City Solicitor).**

See By-law 152-2019

The following motion was considered.

C284-2019 Moved by Regional Councillor Palleschi
Seconded by Regional Councillor Vicente

1. That the report from J. Pittari, Acting Chief Administrative Officer dated July 3, 2019, to the Council Meeting of July 10, 2019, re: **Amendment to Municipal Officials By-law 84-2008 (File G02)**, be received; and
2. That By-law 152-2019 be enacted to amend Municipal Officials By-law 84-2008 to appoint the corporation's two Deputy City Solicitors as Acting City Solicitor on a two week alternating basis respectively, to carry on the duties of the City Solicitor until a new City Solicitor is appointed; and,
3. That the by-law provide that in the event of inability to act, the other Deputy City Solicitor will serve, and where neither can act, that the Chief Administrative Officer may appoint a legal counsel in the Legal Services Division to serve as Acting City Solicitor during such time.

Carried

- 9.2. Report from J. Tamming, Director, Strategic Communications, Office of the Chief Administrative Officer, and R. Said, Advisor, Fire and Emergency Services, Community Services, dated May 9, 2019, re: **Feasibility of: Partnerships to expand Neighbourhood Watch City-wide, and Opportunities to Utilize Brampton Focus with the City's Corporate Communications to Advance City Messaging (RM 57/2019).**

Council consideration of this matter included:

- proposed partnership with Brampton Focus
- existing Neighbourhood Watch Brampton (NWB) program and the proposed Pilot NWB Expansion Project

- need for a clear breakdown of uses for the proposed funding, i.e. salaries, events, rent, et cetera
- possible amendments to Clause 2 of the staff recommendations:
 - to remove the dollar amount until specifics are provided with respect to use of the funds
 - to add "up to" before the dollar amount
 - to add "to include workshops with the captains and advocates, and in consultation with the Community Safety Advisory Committee"
 - to strike out Clause 2 and replace it with "That a scoping workshop be undertaken to identify objectives and costs, that the Community Safety Advisory Committee be consulted, and a detailed budget be developed and brought for Council consideration thereafter;"

In response to questions from Council, staff provided information on the following:

- determination of the proposed funding amount
- meetings between staff and Brampton Focus
- provisions of the City's Purchasing By-law as they relate to the proposed funding

During consideration of this matter, a procedural motion was introduced, voted on and carried, to allow delegations from Brampton Focus to address Council at this time.

Fazal Khan and Don McLeod, Brampton Focus, provided information on the current Neighbourhood Watch Brampton. Mr. Khan and Mr. McLeod responded to questions of clarification from Council.

A procedural motion to Call the Question was introduced by City Councillor Singh. In accordance with the Procedure By-law, Members who had not spoken on this topic were given the opportunity to do so.

The following motion, to receive the staff report and delegations, and approve the recommendations, as amended in Clause 2, was considered.

C285-2019 Moved by Regional Councillor Fortini
Seconded by Regional Councillor Santos

1. That the report from J. Tamming, Director, Strategic Communications, and R. Said, Advisor, Brampton Fire and Emergency Services, dated June 19, 2019, to the Council Meeting of July 10, 2019, re: **Brampton Focus and Neighbourhood Watch Brampton Expansion Partnership – All Wards** be received;

2. That should Council direct staff to proceed and based on the request from Brampton Focus/Neighbourhood Watch Brampton, up to \$150,000 be allocated from capital project #192111 – Community Safety Project to fund the 6 month expansion of the Neighbourhood Watch Program managed by Brampton Focus; to include workshops with the captains and advocates, and in consultation with the Community Safety Advisory Committee;
3. Based on the successful partnership of Safe City Mississauga and Peel Regional Police, that Council encourage Brampton Focus to continue to collaborate with the Peel Regional Police on the expansion of the Neighbourhood Watch program;
4. That Brampton Focus actively search and attain alternative sources of funding to reduce the reliance on City funds in future years to ensure a sustainable Neighbourhood Watch program;
5. That Strategic Communications partner with Brampton Focus, where applicable, to provide video creation and content services, and ensure the outlet proactively receives the City's communications to share across their social channels as a means to improve community safety; and
6. That the added delegation from Don McLeod and Fazal Khan, Brampton Focus, be received.

A recorded vote was requested, and the motion carried unanimously, as follows:

<u>Yea</u>	<u>Nay</u>	<u>Absent</u>
Dhillon	nil	nil
Singh		
Williams		
Fortini		
Medeiros		
Brown		
Bowman		
Palleschi		
Whillans		
Vicente		
Santos		

Carried
11 Yeas
0 Nays
0 Absent

APPENDIX “4”: Email from a City Councillor to Mr. Khan Inviting Neighborhood
Watch to Community Meetings

10.2-49

Saba J. Khan

From: Fazal Khan <fazal@bramptonfocus.ca>
Sent: Tuesday, March 26, 2019 11:49 AM
To: Dhindsa, Rupinder
Subject: Re: Community Meeting Attendance Request

yes... calendar invite would be great!

Fazal Khan,
Brampton Focus
905.601.7185 | [Linkedin](#) | [Twitter](#) | [Facebook](#) | [Blog](#)



On Tue, Mar 26, 2019 at 11:43 AM Dhindsa, Rupinder <Rupinder.Dhindsa@brampton.ca> wrote:

Thank you Fazal! See you all there. Let me know if a calendar invite would help.

Rupinder Dhindsa

Constituency Assistant | Wards 9 & 10

Regional Councillor Gurpreet Dhillon

& City Councillor Harkirat Singh

rupinder.dhindsa@brampton.ca | (905) 874-5910

From: Fazal Khan [<mailto:fazal@bramptonfocus.ca>]
Sent: 2019/03/26 11:42 AM
To: Dhindsa, Rupinder <Rupinder.Dhindsa@brampton.ca>
Cc: don Mcleod <don@bramptonfocus.ca>; Michael Gyovai ; Nicole Cedrone
Subject: Re: Community Meeting Attendance Request

Hi Rupinder. Yes, someone from our team will attend.

10.2-50

See you then.

Fazal Khan,

Brampton Focus
905.601.7185

On Tue, Mar 26, 2019 at 9:21 AM Dhindsa, Rupinder <Rupinder.Dhindsa@brampton.ca> wrote:

Good morning Mr. Khan,

I am reaching out on behalf of Councillor Dhillon & Councillor Singh to have someone from Neighbourhood Watch attend our community meeting on Saturday April 27th at 5:30 pm. The meeting will be held at Ebenezer Hall located at 4494 Ebenezer Rd and will be held alongside Peel Regional Police. The meeting will aim to help address some of the concerns the residents have regarding break and enters around the Vales of Humber area.

Please let us know if this request could be accommodated.

Thank you,

Rupinder Dhindsa

Constituency Assistant | Wards 9 & 10

Regional Councillor Gurpreet Dhillon

& City Councillor Harkirat Singh

rupinder.dhindsa@brampton.ca | (905) 874-5910

10.2-51

Please review the City of Brampton e-mail disclaimer statement at:
www.brampton.ca/en/Info-Centre/Pages/Privacy-Statement.aspx

10.2-52

APPENDIX "5": Emails from Mr. Khan to Individual Councillors Inviting Them to Participate in Recording Promotional Message for Canada Day Celebration at Chinguacousy Park

10.2-53

Bowman, Jeff - Councillor

From: Fazal Khan <fazal@bramptonfocus.ca>
Sent: 2019/06/24 4:02 PM
To: Bowman, Jeff - Councillor
Subject: Re: Request: Canada Day Video Promo

Follow Up Flag: Follow up
Flag Status: Completed

Any availability after 1:30pm on Tuesday, or around 8:30am on Wednesday?

Fazal Khan,
Brampton Focus
905.601.7185 [Twitter](#) [Facebook](#)

On Mon, Jun 24, 2019 at 3:59 PM Bowman, Jeff - Councillor <Jeff.Bowman@brampton.ca> wrote:
Hi Fazal, sorry I wouldn't get to City Hall until 9 as I have a meeting at 7:30 off site. Happy to do it then if there is time.
Jeff

Get [Outlook for iOS](#)

From: Fazal Khan <fazal@bramptonfocus.ca>
Sent: Monday, June 24, 2019 3:31:48 PM
To: Bowman, Jeff - Councillor
Subject: Request: Canada Day Video Promo

Good afternoon Councillor Bowman.

Brampton Focus is working with the City of Brampton to help promote the Canada Day event at Chinguacousy Park. The event day is exciting and we would like a few minutes of your time to record a brief promotional video message.

Your message will use the city's Canada Day branding, and the source video file will be provided to you for uploading directly to your social media.

Please let me know if you are available at **8:50 am on Tuesday morning** in front of City Hall for a video shoot. Once we confirm your timeslot, we will provide you with available messaging options.

Fazal Khan,
Brampton Focus
905.601.7185

10.2-54

Bowman, Jeff - Councillor

From: Fazal Khan <fazal@bramptonfocus.ca>
Sent: 2019/06/26 4:53 PM
To: Bowman, Jeff - Councillor
Cc: don Mcleod; Hiral Patel
Subject: Ready: Canada Day Video

Good Afternoon Councillor Bowman,

Your edited Canada Day promo interview from this morning is now available. You can download and review the video from Google Drive:

<https://drive.google.com/drive/folders/1GnNmIVgCOMxruG8VIjS0GGgVUKu2glGM?usp=sharing>

To maximize the use of the video, please upload it directly to your FB page and include a comment about the celebration at Chinguacousy Park. Also, include the link to the event website at <http://brampton.ca/canadaday>

Please let me know if you have any questions, corrections, or technical problems.

Thank You,

Fazal Khan,
Brampton Focus
905.601.7185 [Twitter](#) [Facebook](#)

10.2-55



Mon, 2019-06-24 11:29 AM

Fazal Khan <fazal@bramptonfocus.ca>

Request: Canada Day Promo

to: Vicente, Paul - Councillor
cc: Vicente, Maria-Petel

Good afternoon Councillor Vicente.

Brampton Focus is working with the City of Brampton to help promote the Canada Day event at Chinguacousy Park. The event day is exciting and we would like a few minutes of your time to record a brief promotional video message.

Your message will use city's Canada Day branding, and the source video file will be provided to you for uploading directly to your social media.

Please let me know if you are available at 9am on Tuesday morning in front of City Hall for a video shoot. Once we confirm your timeslot, we will provide you with available messaging options.

Fazal Khan,
Brampton Focus
905.601.7185

10.2-56

APPENDIX “ 6 ”: Email from Mr. Khan to City Council Thanking Them for Approving Funding (dated July 12, 2019)

10.2-57

Bowman, Jeff - Councillor

From: Fazal Khan <fazal@bramptonfocus.ca>
sent: 2019/07/12 11:58 AM
To: MayorBrown; Vicente, Paul - Councillor; Santos, Rowena - Councillor; Bowman, Jeff - Councillor; Medeiros, Martin - Councillor; Fortini, Pat - Councillor; Williams, Charmaine - Councillor; Dhillon, Gurpreet - Councillor; Singh, Harkirat - Councillor; Palleschi, Michael - Councillor; Whillans, Doug - Councillor
Cc: Said, Razmin; don Mcleod; Nicole Cedrone
Subject: Neighbourhood Watch Brampton Follow-up

Good afternoon Council Members.

On behalf of myself, our board members, and residents across the city, thank you for the vote of confidence in Neighbourhood Watch Brampton and Brampton Focus Community Media with the unanimously approved motion for funding of up to \$150k over 6 months.

We are gearing up over the next few weeks for significant engagement with residents, and will be working closely with city staff to plan a workshop for neighbourhood advocates. We are also preparing a more detailed budget for staff review and details of our 6-month plan.

Please engage with us at any time going forward should you need our assistance or participation at your events. We are more than happy to sit down with you to discuss specific priorities in your Wards that you would like address.

We will certainly keep you informed and include you in all engagement efforts in your Wards. Your participation and support would be greatly appreciated.

Sincerely,

Fazal Khan,
Brampton Focus / Neighbourhood Watch Brampton
905.601.7185 [Twitter](#) [Facebook](#)

10.2-58

**APPENDIX "F": Email from Mr. Khan to City Council Providing City Council with
6-month Implementation Plan for Neighborhood Watch (dated July 18, 2019)**

10.2-59

Saba J. Khan

From: Fazal Khan <fazal@bramptonfocus.ca>
Sent: Thursday, July 18, 2019 12:06 PM
To: Brown, Patrick - Mayor; Vicente, Paul - Councillor; Rowena Santos; Bowman, Jeff - Councillor; Medeiros, Martin - Councillor; Palleschi, Michael - Councillor; Whillans, Doug - Councillor; Fortini, Pat - Councillor; Williams, Charmaine - Councillor; Dhillon, Gurpreet - Councillor; Singh, Harkirat - Councillor
Cc: Brampton Focus - All Dir.; Said, Razmin
Subject: Update - NWB Implementation Plan
Attachments: NWB-6month-implementation-v1.pdf

Good Morning Council. As part of our ongoing communication, please find attached the Neighbourhood Watch Brampton 6 month implementation plan including cost schedule, deliverables, and reference information.

This plan will be presented at the next Brampton Community Safety and Advisory Committee meeting.

I would be pleased to meet, discuss and incorporate your feedback as we move forward.

Thank you

Fazal Khan,

[Brampton Focus](#) / [Neighbourhood Watch Brampton](#)

905.601.7185 | [Twitter](#) | [Facebook](#)

10.2-60



**Neighbourhood Watch Brampton
6 Month City-Wide Rollout Plan
July - Dec 2019**

v1.0
July 17, 2019

Executive Summary

Neighbourhood Watch Brampton (NWB) has developed an aggressive 6-month city-wide implementation plan between July and December 2019 for a comprehensive community well-being and safety engagement and education program that addresses the requirements of the City of Brampton. The plan includes full participation with City of Brampton staff to conduct workshops, including access to resident interactions, event schedules and registration data.

A summary cost schedule and deliverables scheduled is included. A more detailed cost schedule was provided to city staff. In summary, the following investment into the 6 month roll-out is planned:

Canada Summer Jobs Funding Allocation	\$48,412
Brampton Focus In-Kind	\$75,280
City of Brampton Funding	\$150,000
Other Revenue/Funding Sources	\$22,387
-----	-----
6 Month Program Cost	\$296, 079

NWB will deliver 5,000 active program members, 55 community safety advocates, create over 50 community safety videos, support 2 languages (English and Punjabi), distribute 8,000 newspapers, provide community safety livestreams for ward pairs, meet with 28 school councils and support all of the Nurturing Neighbourhood Events (8).

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Appendices

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Partnership Response C150-2019 - Addendum	

Council Resolution

Draft resolution from the Council Meeting of July 10, 2019.

1. That the report from J. Tamming Director, Strategic Communications, and R. Said, Advisor, Brampton Fire and Emergency Services, dated June 19, 2019, to the Council Meeting of July 10, 2019, re: **Brampton Focus and Neighbourhood Watch Brampton Expansion Partnership – All Wards** be received; and
2. That should Council direct staff to proceed and based on the request from **Brampton Focus/Neighbourhood Watch Brampton**, up to \$150,000 be allocated from capital project #192111 – **Community Safety Project** to fund the 6 month expansion of the **Neighbourhood Watch Program** managed by **Brampton Focus**; to include workshops with the captains and advocates, and in consultation with the **Community Safety Advisory Committee**;
3. Based on the successful partnership of **Safe City Mississauga** and **Peel Regional Police**, that Council encourage **Brampton Focus** to continue to collaborate with the **Peel Regional Police** on the expansion of the **Neighbourhood Watch** program; and
4. That **Brampton Focus** actively search and attain alternative sources of funding to reduce the reliance on City funds in future years to ensure a sustainable **Neighbourhood Watch** program; and
5. That **Strategic Communications** partner with **Brampton Focus**, where applicable, to provide video creation and content services, and ensure the outlet proactively receives the City's communications to share across their social channels as a means to improve community safety; and
6. That the added delegation from **Don McLeod** and **Fazal Khan**, **Brampton Focus**, be received.

City of Brampton Program Outcomes

Outcomes as required by the City of Brampton:

Increased perceptions of security and connectedness to neighbours and community, among participating members

- *Metrics (To be reviewed/modified as part of Advocates workshop)*
 - Number of new participants
 - Number of new Advocates
 - Number and date of neighbourhood launches
 - Location of active neighbourhood watch groups
 - Number of Crime Prevention Through Environmental Design (CPTED) presentations administered
 - Participant survey results

6 Month Plan

(Phase 1, 2, 3)

The city-wide roll-out plan is divided into 3 phases of approx. 2 months each:

Phase 1 (Startup) is to restart the program with effective marketing outreach and re-establish connections with past participants.

Phase 2 (Engage) is to work with community groups and advocates to develop neighbourhoods.

Phase 3 (Consult) is to gather feedback and report on the roll-out while continuing the engage with residents and groups.

Publications

- Design, print and distribution of Neighbourhood News (monthly for prospective members) 2,000 copies/month (Aug-Nov)
- Neighbourhood Advocates (100)
- Planning for Annual Spring Neighbourhood Safety Publication (Members)

Student Milestones

Android App Prototype – August 30 2019

Automated Geo-Notifications – Sept 30 2019

Annual Membership

- Geo-based notifications
- Ongoing email communication
- Member kit with Sticker sheet, Info Guide
- Partner inserts, coupons, offers etc.
- Annual Publication
- Access to Members FB group

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Phase 1 – Startup

(July/Aug)

- Reactivate existing groups (partner for Neighbourhood Initiatives Grant)
- Develop basic marketing handouts (July)
- Purchase marketing/tech equipment/T-shirts
- Implement marketing/CRM/ticketing system
- "Captains" meeting with COB
- Publish "Neighbourhood News" – Monthly printed publication for new members only
- Develop comprehensive welcome kit (stickers, handouts etc) - \$8 donation request
- Develop new onboarding video series
- Redesign website
- Development Social Media Plan
- Complete Prototype app
- Partner with Nurturing Neighbourhoods
- Post weekly community safety metrics
- Recruit multi-lingual advocates that can present
- Develop sponsorship plan
- Ongoing outreach to neighbourhoods, community groups

Phase 2 – Engage

(Sept/Oct)

- Partner/Visit with community groups/events (school councils, libraries, seniors clubs, businesses etc)
- Publish “Neighbourhood News” – Monthly publication for new members only
- Shoot multi-lingual videos
- Implement geo-based notification system
- Partner with Nurturing Neighbourhoods
- Plan Winter Community Safety Show – February 2019
- Plan Spring Publication for all subscription
- Implement social media / email / ads
- Implement sponsorship plan
- Delegate to Region of Peel, Police Services Board
- Livestream with the Mayor
- Livestream with the Fire Chief
- Livestream with the Police Chief / CLO / Crime Prevention
- Ongoing outreach to neighbourhoods, community groups

Phase 3 - Consult

(Nov/Dec)

- Partner/Visit with community groups/events (school councils, libraries, seniors clubs, businesses etc)
- Publish "Neighbourhood News" – Monthly publication for new members only
- Publish "Neighbourhood Advocates" – quarterly for captains / city staff / councillors / sponsors
- Plan Winter Community Safety Show –Tentative February
- Develop Spring Publication for all subscription members
- Implement social media / email / ads
- Implement sponsorship plan
- Livestream Ward 1/5
- Livestream Ward 2/6
- Livestream Ward 3 / 4
- Livestream Ward 7/8
- Livestream Ward 9/10
- Ongoing outreach to neighbourhoods, community groups

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6 MONTH COST SCHEDULE

	July	Aug	Sept	Oct	Nov	Dec	Total
Staffing (non-student)	\$ 11,300	\$ 12,300	\$ 13,800	\$ 13,800	\$ 13,800	\$ 13,800	\$ 78,800
Transportation	\$ 1,160	\$ 2,160	\$ 660	\$ 660	\$ 660	\$ 660	\$ 5,960
Office Expenses	\$ 439	\$ 1,287	\$ 439	\$ 439	\$ 439	\$ 439	\$ 3,482
Insurance	\$ 250	\$ 250	\$ 250	\$ 250	\$ 250	\$ 250	\$ 1,500
Web/Cloud Services	\$ 4,425	\$ 780	\$ 780	\$ 780	\$ 780	\$ 780	\$ 8,325
Marketing	\$ 5,258	\$ 7,230	\$ 2,400	\$ 2,200	\$ 2,200	\$ 700	\$ 19,988
Newspaper / Printing		\$ 3,174	\$ 2,034	\$ 2,034	\$ 2,034		\$ 9,276
Member Kit	\$ 13,914	\$ 8,795	\$ 1,000	\$ 1,000	\$ 1,000		\$ 25,709
Sponsor Kit		\$ 2,207					\$ 2,207
Video Production Equipment	\$ 8,240						\$ 8,240
Live Stream Equipment / Data		6500	600	600	600	600	\$ 8,900
	\$ 44,986	\$ 44,683	\$ 21,963	\$ 21,763	\$ 21,763	\$ 17,229	\$ 172,387
Summer Students	\$ 24,206	\$ 24,206					\$ 48,412
Brampton Focus Inkind	\$ 12,547	\$ 12,547	\$ 12,547	\$ 12,547	\$ 12,547	\$ 12,547	\$ 75,280
						6 Month Program Cost	\$ 296,079
COB Funding Request	\$ 90,000		\$ 40,000		\$ 20,000		\$ 150,000

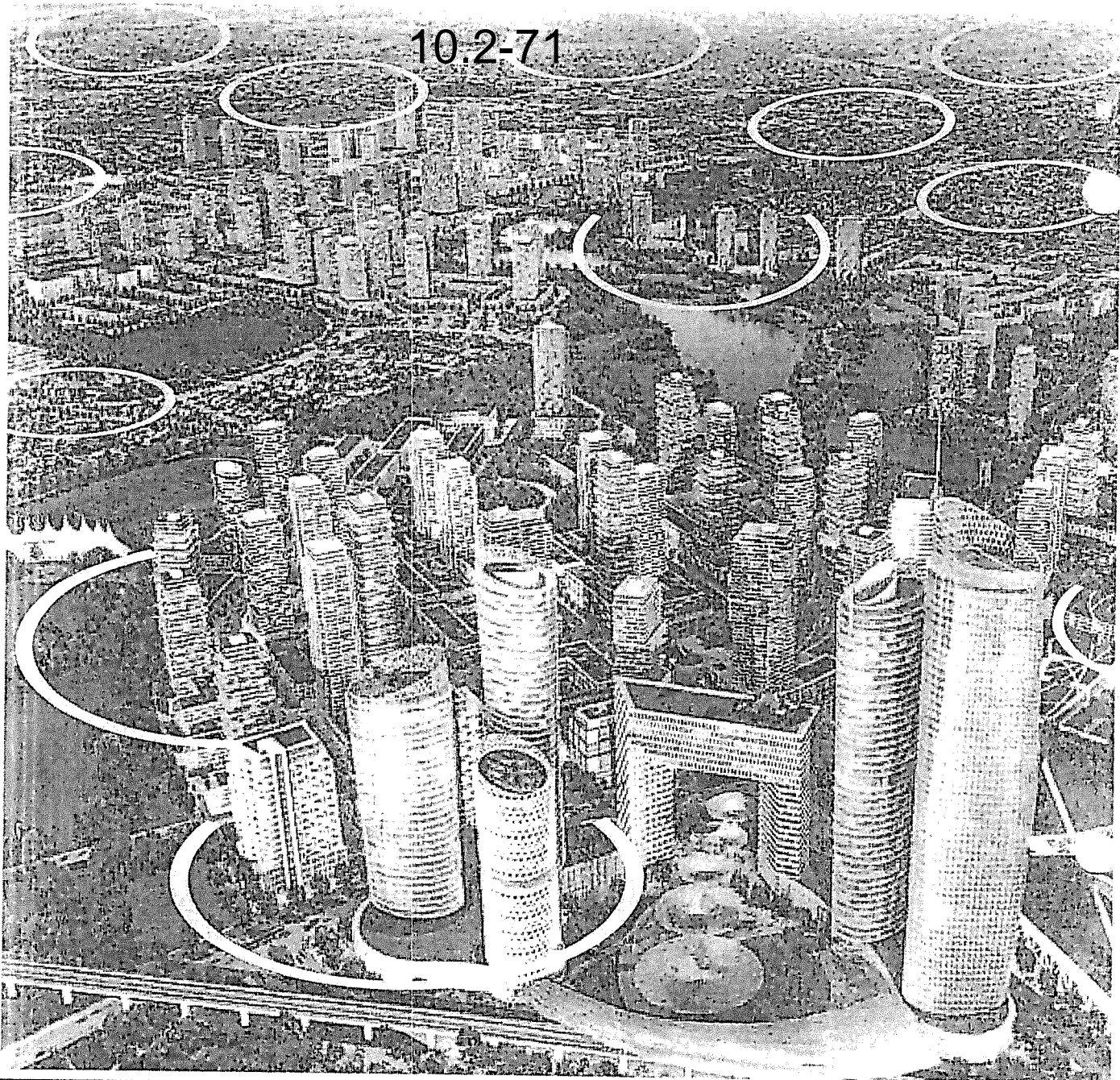
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6 MONTH DELIVERABLES SCHEDULE

	July	Aug	Sept	Oct	Nov	Dec	Final
COB Advocates Meeting				1			1
COB Staff Monthly Consultation	2	2	2	2	2	2	12
Members		3000	3750	4500	4750	5000	5000
Advocates		35	40	45	50	55	55
Active Groups		35	45	55	65		65
New Activations		2	4	2	2		10
Onboarding Videos		6			2		
Police Videos		4	6	6	4		20
Fire Videos		4	6	6	4		20
Newspapers Distributed		2000	2000	2000	2000		8000
Community Safety Status Video	1	1	1	1	1	1	6
Community Safety Livestreams		2	3	2	2		9
Community Grant Partnerships		5	5	5			15
Nurturing Neighbourhood Events	2	2	2	2			8
Survey						1	1
Mayor Events		1	1	1	1		4
Ward 1/5 Events		1	1	1	1		4
Ward 2/6 Events		1	1	1	1		4
Ward 3/4 Events		1	1	1	1		4
Ward 7/8 Events		1	1	1	1		4
Ward 9/10 Events		1	1	1	1		4
Parks visited	2	20					22
School Council Meetings			6	10	12		28

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fb.com/bramptonfocus



bramptonfocus.ca

PARTNERSHIP RESPONSE

Brampton Focus Community Media /
Neighbourhood Watch Brampton
& City of Brampton

May 29, 2019

Response by:

Donald McLeod, President-Brampton Focus
Fazal Khan, Co-Founder-Brampton Focus

Background

This report is prepared as a follow-up from a meeting on May 10th with City of Brampton Emergency Management and Corporate Communications staff. The meeting was held as a follow up to Motion C150-2019 passed at the May 7th, 2019 City of Brampton Council meeting.

Resolution C150-2019 was moved by Mayor Brown, seconded by Regional Councillor Santos that staff report back to Committee of Council by June 12th on the feasibility of:

- 1) partnerships to expand Neighbourhood Watch city-wide, and
- 2) opportunities to utilize Brampton Focus with the City's Corporate Communications to advance City messaging similar to techniques utilized in Mississauga.

Notes

Brampton Focus or the acronym BF refers to Brampton Focus Community Media Inc.

NWBrampton or NWB refers to Neighbourhood Watch Brampton

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1.0 Executive Summary

Brampton Focus Community Media (BF) is proposing a formal partnership with the City of Brampton in response to resolution C150-2019 passed by City Council on May 7, 2019. The resolution asks staff to look at expanding Neighbourhood Watch Brampton (NWB) and utilizing BF to advance city messaging.

NWB is a program run by BF that relies on video communication, social media, neighbourhood engagement, and ongoing communications. These skills combined with advanced knowledge of social video production and tangible case studies of video communications and live stream success provides evidence that BF is the ideal community media partner for Brampton.

The proposal is a 3 year partnership with an option to extend for 2 years. In exchange for space at Brampton City Hall and an annual sponsorship

of \$300,000, BF will expand NWB to a minimum of 10,000 households, and provide video and livestreamed productions to advance council's and the city's corporate messaging needs. These include multi-camera livestreams of 3 annual events (e.g. Santa Claus Parade), interactive livestreamed shows with council or community members, development of new social videos for various city departments, and opportunities for council to address residents after council meetings.

BF will also continue to implement its proprietary Neighbourhood Centric Continuous Engagement process to work with more residents, more community groups, and provide comprehensive community media coverage that will improve the city's vibrancy and support the long term viability of neighbourhood groups.

2.0 Brampton Focus Community Media

2.1 Brampton Focus History

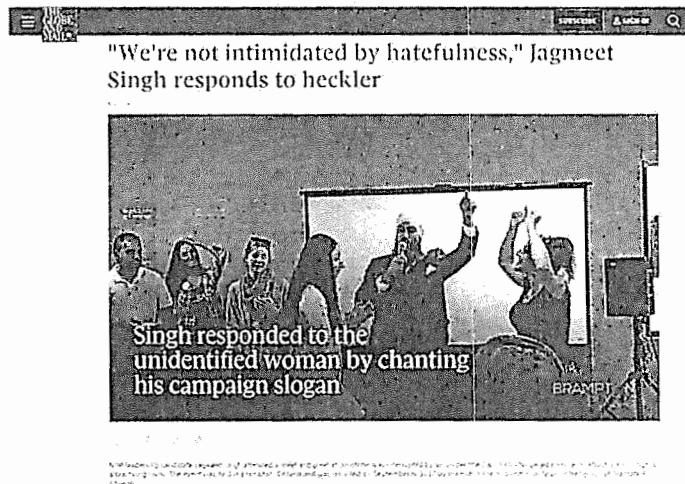
Brampton Focus Community Media started in 2015 as an informal resident group. The group was incorporated as a non-profit in September 2016 with a board, constitution and bylaws. The founders of the organization all ran unsuccessfully in the 2014 municipal election and were determined to ensure that all residents could raise issues, engage with community leaders, and feel connected.

BF began in a changing media landscape and relied extensively on studio based interviews and live streams. The interviews were aired weekly on Rogers Cable 10 and over 100 hours of broadcast quality programming was delivered with guests ranging from residents to the sitting Premier of Ontario (Kathleen Wynne). Rising star politicians have appeared on our interviews including then Ontario PC Leadership hopeful Patrick Brown,

Federal NDP Leadership hopeful Jagmeet Singh and Innovation Minister Navdeep Bains.

After the closure of Rogers Cable 10 in Peel, BF switched to a mobile social media video interview format and multi-camera live streaming of community events and interviews. The most prominent live stream to date is the "Jagmeet and Greet" event (**Figure 2A**) from September 2017 which has been watched online over 150 million times and appeared on prominent broadcast TV programming around the world. Many journalists cite the existence of the video as evidence for the value of local media coverage.

BF abandoned an advertising-based revenue model in 2018 while maintaining cost-free media training and video coverage. Revenue to support this free model is provided by board members, federal and provincial grants for selected content, and business sponsorships.



BF attended a Jagmeet Singh campaign event in Sept 2017 and captured a protester on video at the beginning of the event. The video was initially live streamed and later distributed as a stand-alone video. BF granted video and distribution rights to over 40 media outlets worldwide. The Globe and Mail version pictured has over 1.4M views on YouTube. The NowThis Politics video in the U.S. has over 60M views on Facebook. The video was also featured in the CNN program United Shades of America.

Figure 2A "Jagmeet & Greet" Leadership Candidate Event in Brampton - Sept 2017

2.2 Community Media Mandate

Community media is every form of non-profit media that is created in service of a community or by community members. Community media plays a valuable role in providing low-cost or no-cost opportunities for local citizens and groups to connect, engage and collaborate on local concerns.

The media landscape is undergoing extreme changes. The ability to deliver content to an audience in a sustainable business model is challenging in an environment where Facebook and Google advertising dominates. BF has thrived in this environment by relying heavily on volunteers, utilizing modern communication and social media tools, and keeping cost a paramount concern.

Community media brings identity, vibrancy and participation in civic matters. **Table 2A** shows a subset of the community groups, events and issues that were covered in the past 12 months. Many groups listed receive no attention from traditional or web-based media in the city.

Social media data analytics and qualitative ongoing review of resident comments provides convincing evidence that residents will participate in large numbers and raise their voices when they are provided with a safe place to participate, when

they are not demeaned, and when the content is interesting, engaging and consumable.

BF has organically developed a number of social media properties over the past 2 years, including:

- BF Facebook Page 9,300+ likes
- BF Twitter 1,700+ followers
- Neighbourhood Watch FB page 1,300+ followers
- NWBrampton Twitter 430+ followers

Website properties include:

- bramptonfocus.ca
- nwbrampton.ca
- harmonize.ca (diversity/inclusion video hub)
- recessreport.ca (K-12 education)
- SeniorsTownHall.ca (in development)
- SmallBizHub.ca (in development)

SeniorsTownHall.ca is being developed with a federal grant. Harmonize.ca was developed with a provincial grant.

An example of the benefits of community media is the relationship between BF and Peel Regional Police. BF produced a distract driving video recently See **Figure 2B**.



Unique Viewers: 30,920
 Reach: 67,976
 Engagements: 1,666
 68% Men / 31% Women
<https://www.facebook.com/BramptonFocus/videos/379341635990460>

Figure 2B Distracted Driving Public Service Video with Peel Regional Police

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2018 Municipal Election Night	PDSB – Director of Education Peter Joshua
2018 Provincial Leaders Livestreams	PDSB – Elevate 2018
Algoma University	PDSB – Turner Fenton and Culturefest
Ammadiyah Muslims Brampton	PDSB – We Rise
Auto Insurance - CCV Insurance	Peel Police Chief Jennifer Evans
Auto Insurance – Gurratan Singh	Peel Police Distracted Driving
BeauxARTS	Peel Police Road Safety Week
Boys & Grills Club	Peel Police Traffic Stop
Brampton Celebrity Hockey Classic	Peel Youth Charter
Brampton Cricket - various	Provincial NDP Leader – Andrea Horwath
Brampton Library	RAA Youth Group
Brampton Soccer	Regeneration Outreach
Brampton State of the City Interview	Regional Diversity Roundtable - various
Cannabis Coverage	Regional Government Review Coverage
Carabram	Riverwalk EA event
Centre for Leadership and Innovation Canada	Riya Rajkumar Fundraiser / Vigil
Chinese New Year Event	Ryerson University
City Building Mayoral Debate	Santa Clause Parade
City of Brampton - Nurturing Neighbourhoods	Scottish Flag Raising / National Tartan Day
Conservative Leader Andrew Scheer	Seniors Groups - various
Conservative MP Candidate - Arpan Khanna	Shahid Afridi Foundation
Conservative MP Candidate - Ramona Singh	Sikh Heritage Month
Code Grid Lock / Hallway Health Issue	Sports Day in Brampton
Defense Minister - Harjit Sajjan	Street Check Provincial Consultation
Downtown Brampton – Party in the Lanes	Tamil Heritage Month
Flag Raising – Danish	Townhall Tuesday - Community Safety
Gore Meadows Outdoor Rink	Townhall Tuesday - Economic Development
Habitat for Humanity	Townhall Tuesday - Poverty
Haviah Mighty	Turner Fenton Secondary School
Hindu Heritage Month	Vision Brampton
International Womens Day	Women Helping Women
Jared Kerr Long Jumper	World of Jazz Festival
Mayor Patrick Brown	World Sikh Organization
MPP Sarah Singh - Hospital Issues	Wounded Warriors
Parental Alienation	Youth Town Hall - Livestream

Table 2A BF Video Coverage Highlights - Prior 12 Months

2.3 Media Co-Existence

The four categories of media groups in Brampton are summarized in **Table 2B**. Each group serves a specific and useful purpose and can co-exist successfully. A community media partner can provide added value to the other three groups by creating original content and making it available for rebroadcasting or repurposing.

Brampton's Santa Claus Parade is a useful example of a well-known city event that could be live-streamed in an unbranded format by Brampton Focus and rebroadcast by any or all media groups in Brampton. Media groups that opt to rebroadcast would gain highly relevant content to share with their viewers on their own platforms. This would mean more residents have access to view and engage with the content. It also enables the City of Brampton to project a more vibrant image of the city to a greater number of residents. The community organizers for the parade also get a much more marketable event to future sponsors, volunteers and floats. This positive upward cycle of engagement can be repeated for other festival events, community group events, and interviews where a video format is possible.

The Santa Claus Parade scenario described is possible because BF is connected with the community, has a high degree of video production and web skills, can mobilize the equipment and operators for the production, can co-ordinate and promote with all involved, and can tap into a skilled group of volunteers. This would be an overly expensive task for any other media group in the city, including the City of Brampton.

The 2018 City Building Mayoral Debate that was developed and delivered by Brampton Focus

at the Rose Theatre is an example of the media co-ordination and organization skill in action. Local media were invited and attended the event, and were given special access, passes, seating and rights to rebroadcast the event. The event appeared the next day on the front page of the Toronto Star and was covered in-depth in the GTA section (**Figure 2C**). The event video was made available to all media and was also streamed a week later by Brampton Focus on Facebook and Youtube. Registration for the live event was stopped at 750 people and over 550 attended the event, filling the lower bowl. Over 3,200 residents viewed the debate on Youtube, another 12,000 on Facebook. Community partners were engaged including Vision Brampton, New Brampton and prominent residents.

The 2018 debate could not have been organized by any other media group except a community media group like BF. Brampton's corporate communications staff could not have organized the event for obvious political interference reasons. Other community groups who organized debates held their events as low key affairs with limited public access that received minimal reach. Community and media groups that attempted to produce livestreams were unprofessional and lacked basic production value. Traditional for-profit local media is not equipped to organize and broadcast highly produced events.

The ideal scenario for the 2018 debate would have been to live stream the event in addition to broadcasting it a week later. The stream could have been given to all media groups, including Toronto based media for rebroadcasting. To do so however would have required significantly more cost and resources which the organizing team opted against.

10.2-79

Traditional For-Profit Media (Brampton Guardian, ethnic media)

Relies on paid advertising and expends all of their resources on a cycle of content production and ad views. There are few resources remaining to engage with residents regularly. The first to release a story usually gets rewarded with more views/ad views. However, distribution, reach, quality, local content relevance, lack of competition and depth of coverage are growing issues. Receives substantial municipal revenue with unverifiable value for money results.

Web For-Profit Media (Bramptonist, InBrampton)

Competes with Google and Facebook for online advertising revenue. This business model is challenging in a city the size of Brampton as there is not enough traffic and ad engagement for substantive online article posts. It is often financially effective to distribute click-bait articles that have superficial content loaded with advertising. The content is often time-insensitive so that the content can be consumed, re-purposed and redistributed over months and even years. These groups often have high distribution and reach to younger demographics. However, engagement levels with the content is low, particularly with content that is civic minded.

Corporate Communication Groups (City of Brampton, Peel Police, Peel Region)

Primary focus is to keep their brand intact while promoting messaging that aligns with corporate priorities. The messaging is often narrowly scoped and difficult for residents to consume. This group dabbles with alternative formats (blog posts, video, social content) with varying degrees of success. The cost of developing corporate communication content is the highest with rudimentary metrics for measuring resident engagement. The content from this group is original and best consumed and re-purposed by the other media groups.

Non-Profit Community Media (Brampton Focus Community Media, Rogers Cable 10)

Content development is driven by a well developed network of community groups and resident contacts. For a small town, a volunteer driven and volunteer funded community media outlet could suffice. However, in a city the size of Brampton, a volunteer only community media group cannot cover the depth and breadth of community events and issues that occur everyday. Dedicated staff, community space and equipment is needed to adequately cover the needs and growth of the community network. The network can be segmented and content created and delivered to specific segments (e.g. seniors, sports, faith based, geographic location, interests etc) in partnership with the community network.

Table 2B Categorization and Description of Media Groups in Brampton



...eague of basic income plan



Figure 2C Front Page and GTA Section Media Coverage of the 2018 City Building Mayoral Debate

3.0 Neighbourhood Watch

3.1 What is Neighbourhood Watch?

Neighbourhood Watch is an umbrella term for approaches to citizen-based community crime prevention. The program has roots in Queens, New York during the late 1960s after the rape and murder of a woman went unreported by over a dozen witnesses. Variants of the program have spread globally with the aim of developing a culture of reporting to police, educating residents on home and personal security and achieving a safer neighbourhood.

The “brand” of Neighbourhood Watch came under intense scrutiny after the death of teenager Trayvon Martin in Florida in 2012 at the hands of George Zimmerman. Mr. Zimmerman was engaged in an armed patrol of his neighbourhood.

A common question asked by residents, community leaders and law enforcement officials is “Does Neighbourhood Watch work?” A recent study of Mississauga’s Neighbourhood Watch Program estimates a 400% return-on-investment and a savings to taxpayers of \$1.7M in the prevention of property crimes. A more extensive qualitative and quantitative analysis of 340 municipalities in the Netherlands illustrates how the program contributes to lower crime levels and collective efficacy (reference: Neighbourhood Watch in a Digital Age, 2018, Vasco Lub <https://www.palgrave.com/gp/book/9783319677460>).

The various programs in municipalities around the world have both positive and negative effects as outlined in **Table 3A**. The implementation of the program at the neighbourhood level highly influences which effects are prevalent.

Positive Effects	Negative Effects
Contribution to fighting crime	Stigmatization/social exclusion
Vigilance among residents	Impulsive actions of residents
Extension of police and auxiliary services	An absolute interpretation of security
Contribution to collective efficacy	Excessive social control

Table 3A Contrasting Effects of Neighbourhood Watch
Neighbourhood Watch in a Digital Age, pg 190, Table 9.1

3.2 Neighbourhood Watch Brampton (NW Brampton) Implementation

Neighbourhood Watch Brampton (NW Brampton) is an innovative implementation of the Neighbourhood Watch program that supports efforts to improve that quality of life in local neighbourhoods across Brampton. This support includes engaging residents to participate in community building activities, increased communication, developing engaging crime prevention and educational resources, organization community events, and raising awareness of events/activities/programs available to residents.

The primary outcome of NWB is to increase resident awareness of crime prevention and

encourage the exchange of contact information with adjacent neighbours. **Figure 3A** shows a city wide coverage map from July 2018 of households that have registered with the program and started the video onboarding program. **Figure 3B** is a street level coverage map of the Snelgrove area in Brampton. The Snelgrove area is the most well developed and effective Neighbourhood Watch Group in the city with a program adoption rate over 70%.

The program is evolving from a crime prevention program delivered in a stand-alone format, and is becoming a community networking and capacity building service for local resident-based groups. These groups are typically geographical based ranging in size from 40 to over 500 households. Much larger interest-based groups are now being incorporated into the program delivery including

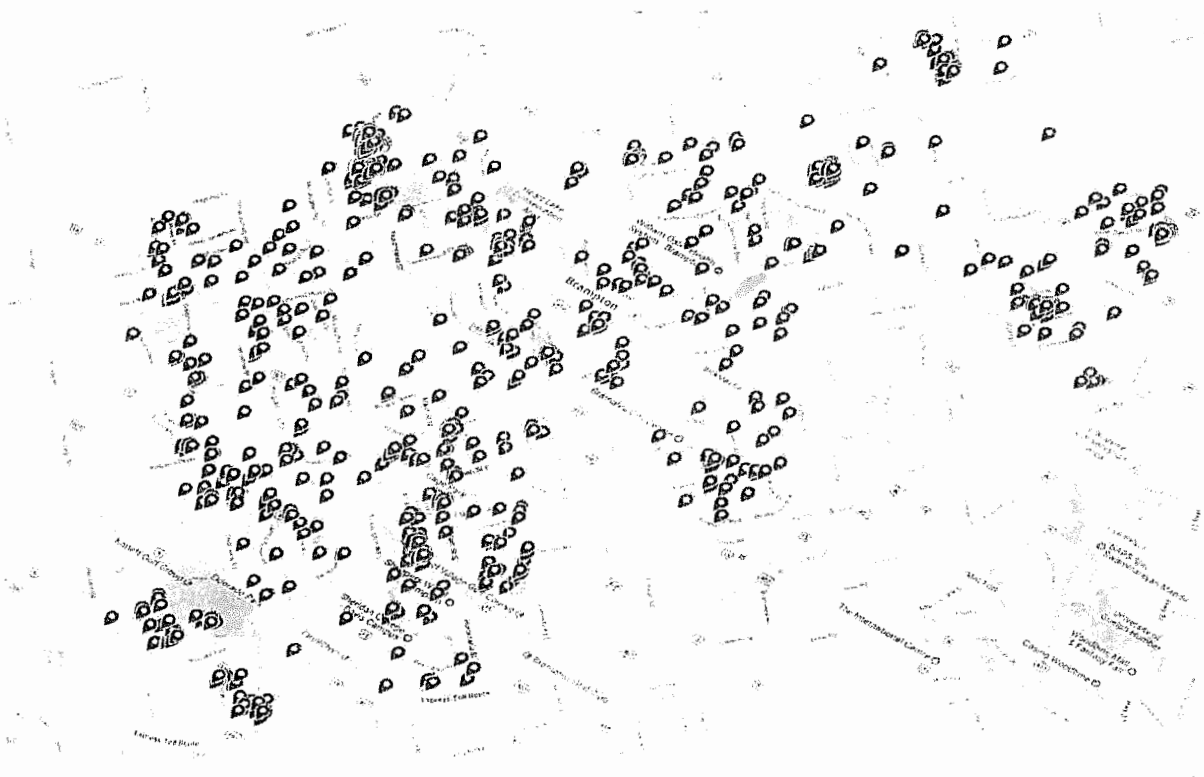


Figure 3A City-Wide Registered Household Coverage Map - July 2018 (approx 3,000 households)

10.2-83

sports groups (cricket/soccer), school, youth, library users, seniors, faith based, non-profits and small businesses. Crime prevention is then delivered as an add-on to the core purpose of each group.

The concept of a "Watch Captain" is also being phased out by NWB as the term evokes the idea of proactive surveillance, authority and patrols. NWB relies instead on local resident "advocates" to take a leadership role in the organization and ongoing

communication amongst local neighbours. These residents are encouraged to share the responsibility to keep their groups together and active. However, these residents are not part of the formal NWB program management and are free to operate their groups as they see fit. This flexibility allows established community groups to leverage the resources of NWB while maintain their identity and charter.

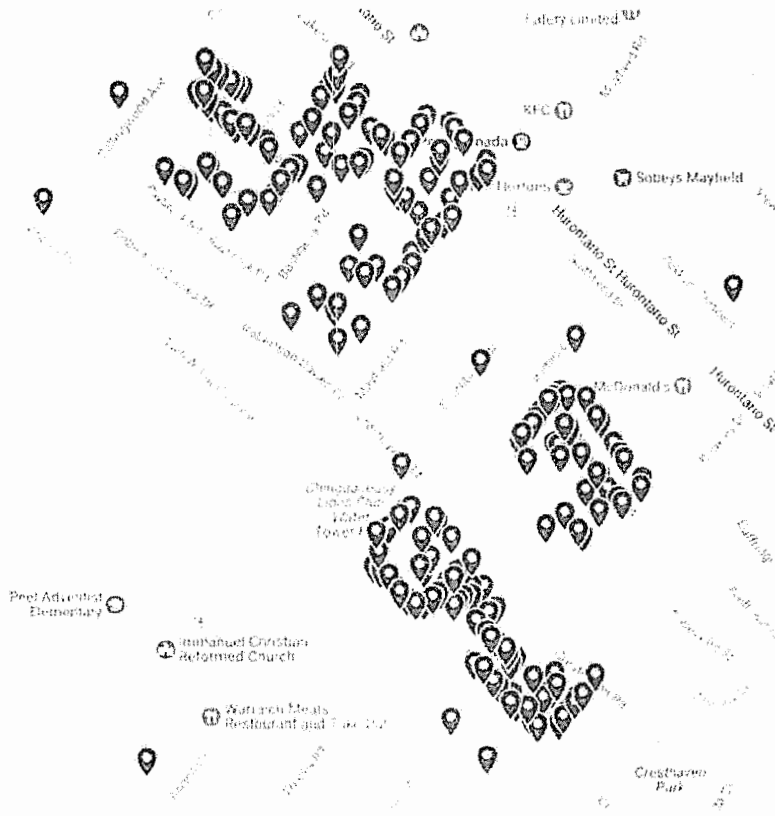


Figure 3B Street-Level Coverage Map - Snelgrove

3.3 History of NWBrampton

NWBrampton started operating in Brampton in January 2017 after the closure of Brampton Safe City in June 2015. NWB was designed to evolve based on the needs of residents and to efficiently scale up to a fully adopted city-wide program.

The decision to reactivate NWBrampton as a program under BF was made based on the high need for video communication as an effective training and education tool, and the need to increase engagement levels with residents interested in crime prevention and community safety.

The design of NWBrampton is based on modern communication tools and technologies including online registration, email, SMS, social media, video, live streaming and marketing automation. A number of traditional tools are also be utilized as needed including community canvassing, printed handouts and door-hangers (see **Figure 3C**), community newspapers (see **Figure 3D**), community centre meetings and townhalls. These tools and resources are deployed based on a variety of factors including the time of year, availability of volunteers, availability of funding, and resident participation rates.

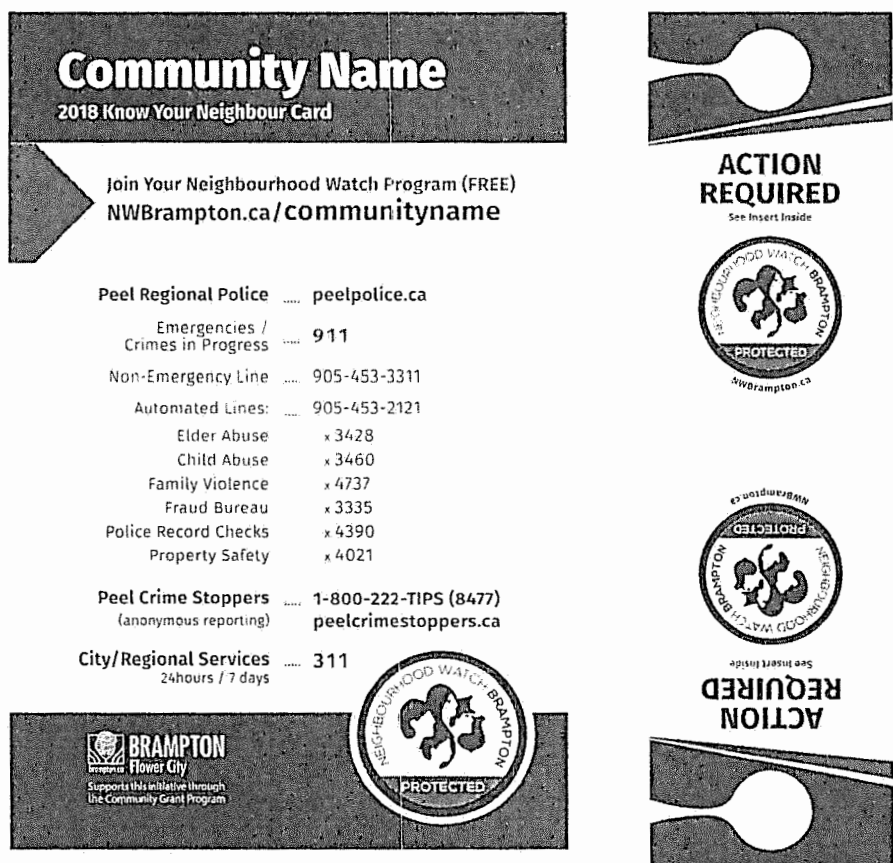


Figure 3C Sample Newspaper Insert and Custom Designed Newspaper Hanger (not actual size)



NEIGHBOURHOOD WATCH NEWS

\$2 Autumn 2018 Join at NW Brampton.ca

Free book library spreading to city streets / P6

System relies on the honour policy: if you take a book, return a book



Community Crime Prevention / News / Events / Resources



Brampton's Vision for 2040 - Presented to Council by renowned urban planner Larry Beasley

CITY NEWS / P4



Neighbourhoods Across the City are Getting onboard

The re-launch of the Neighbourhood Watch program in 2017 has caused a huge spike in interest from residents across the city on how to set-up their own groups. The process is very simple and can be quickly initiated on your mobile phone by visiting NW Brampton.ca and clicking the JOIN button.

Check out the map of neighbourhoods on P8-P9 that have joined this summer and a few others from last year that are still growing. Stay connected with your neighbours and get valuable information on how to prevent crime in your area.

Outrage is not a solution to recent violent crime spike

The uptick in violent crime in Brampton has residents concerned. Recently, we've all been shocked by the attempted murder of a 5-year old boy left to die on a railway track, the swarming and multiple stabbing of a 16-year old boy in June near the splash pad of a recreation centre, and the murder of a 21-year old man in March outside a high school by thugs with sticks.

Everyday we hear about violent crimes, hit and runs, thefts, attacks and the like in Brampton. Other than policing, which typically is a reactive rather than preventative measure, are there any other programs that are showing success in deterring and addressing the root causes of violent crimes?

Neighbourhood Watch Brampton sounded the alarm bell way back in March. We were highly critical of the lack of attention from city council on crime prevention and community safety issues. While residents are demanding immediate action to address violent crime, including the increase in drug related incidents, nothing seems to be happening.

Compounding the anxiety is a regular supply of social media videos of young people behaving badly. Add in the occasional shaky video of a police takedown or a security video of a broken break and enter and we have the perfect recipe for panic. We are making it easy for Toronto media to build the ongoing narrative that our city is crime ridden.

Is there a politician anywhere in the city at any level of government that is working to reverse this narrative? We've seen many townhalls where residents express their frustrations with little offered in immediate solutions.

...Continued P10



WAFFLES MADE FRESH TO ORDER

Williams
fresh Cafe

FREE LARGE COFFEE

Limit 1 per day. Freshly brewed original coffee, served at Williams Fresh Cafe, 2424 Queen St. E. Location in Brampton Only. Expires Sept 15, 2018.

Figure 3D Front Page of the August 2018 Neighbourhood Watch Newspaper (15,000 distribution)

4.0 Neighbourhood Centric Continuous Engagement Process

Neighbourhood Watch Brampton has developed a proprietary process for developing new neighbourhood groups and building capacity in established groups. The process is referred to as **Neighbourhood Centric Continuous Engagement** and relies heavily on technology and community media capabilities (**Figure 4A**).

In his 2019 book *"The Third Pillar: How Markets and the State Leave the Community Behind"*, renowned economist Raghuram Rajan makes a compelling argument that globalized markets and government have abandoned the idea of community. The result is the loss of a shared civic existence and lack of local vibrancy that is needed for people to flourish. This resulting despair and isolation has been a prevalent sentiment of Brampton residents over the past 2 years as Neighbourhood Watch Brampton (NWB) was deployed.

Rajan argues that a strong community is needed to balance the effects of markets and government. From this perspective, the question previously posed "Does Neighbourhood Watch work?" should instead be "Do we want stronger, more resilient and vibrant neighbourhoods?"

Not surprisingly, residents in Brampton would answer this question in the affirmative. The challenge is how to achieve this for all neighbourhoods in Brampton. The solution is a Neighbourhood Centric Continuous Engagement process that develops neighbourhood groups and adds community media engagement to keep groups thriving.

A major challenge for neighbourhoods is keeping their groups active, particularly over the

winter months. Too often, groups form around the premise of reducing neighbourhood crime and have little else motivating membership bonds. When the perception of crime lowers, the group no longer function.

The process requires residents who contact Neighbourhood Watch Brampton to first watch a series of brief introductory training videos. Residents who watch the videos can then request to start a neighbourhood group. These new groups are the most difficult to stay together over time. The program can now quickly detect groups that have a higher likelihood of decaying rapidly. These groups are currently left to decay as they require significant resources to develop strong bonds.

Established groups where members already know each other have a greater chance for continuity year over year and are more resilient if members move or can no longer participate. These groups pro-actively schedule meeting space, actively follow-up, and can quickly get a higher percentage of neighbours to show interest in crime prevention education.

In 2018, fifteen neighbourhoods across the city were supported with the development of a high quality 16 page full colour community newspaper that was delivered directly to the front door to an entire neighbourhood. Each neighbourhood was supported in applying for a Neighbourhood Initiative through the city's Community Grant program. The results were good in retaining members, however, a single edition was not enough to increase neighbourhood memberships.

Neighbourhood Centric Continuous Engagement

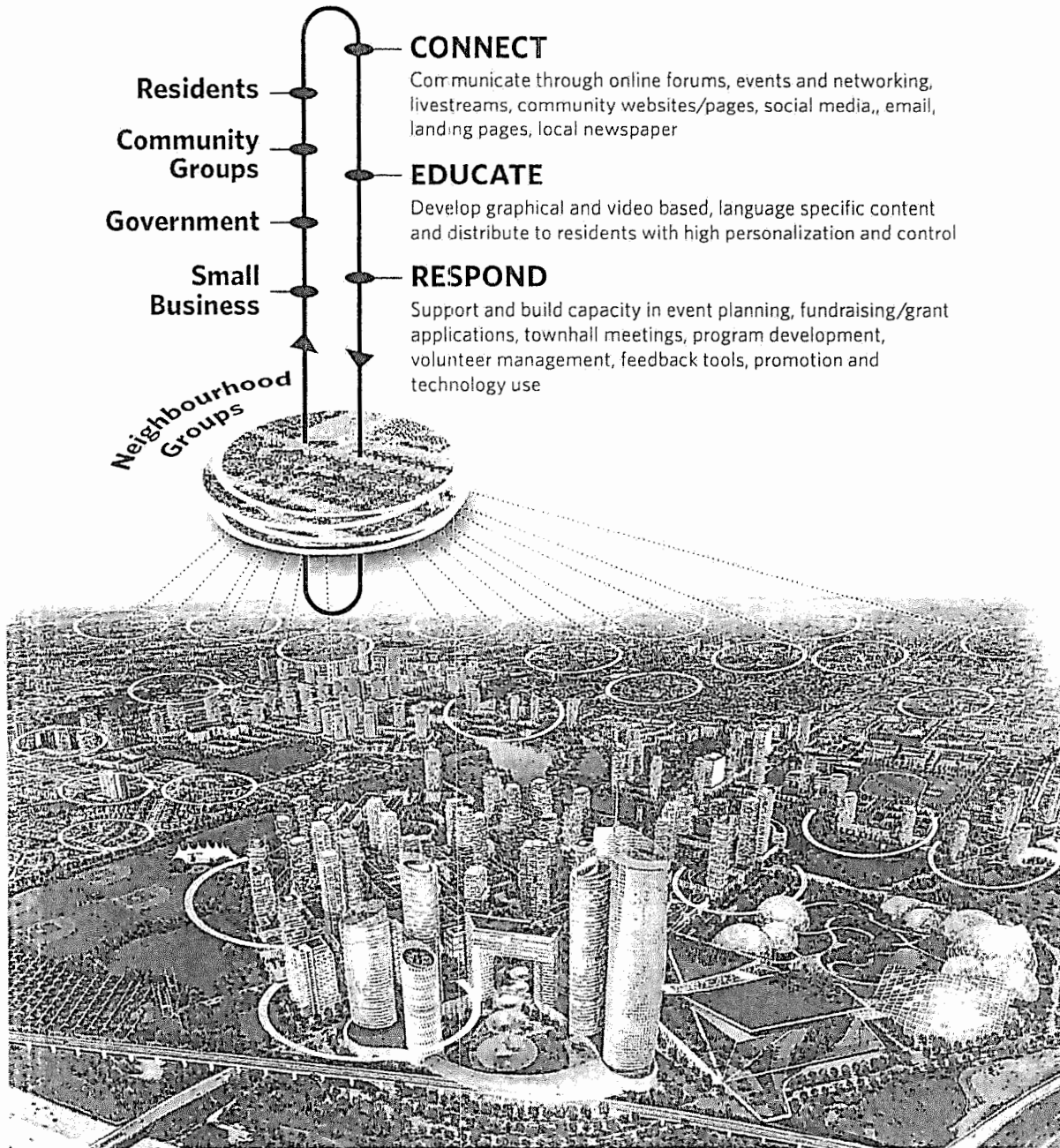


Figure 4A Neighbourhood Centric Continuous Engagement Process

5.0 Resolution C150-2019 / Proposal

Resolution C150-2019 refers to the further expansion of Neighbourhood Watch city-wide and opportunities to utilize Brampton Focus with the city's corporate communications to advance city messaging.

To address resolution C150-2019, BF is offering the City of Brampton a proposal that would reach significantly more residents with the Neighbourhood Watch Brampton program while providing new opportunities to reach residents with city messaging and communication through video and live streaming opportunities.

The proposal requests space for a "City Studio" within City Hall and an annual sponsorship of \$300,000. See **Table 5A** for a summary of the proposal metrics over a 3 year timeline. The summary includes a breakout of Human Resources needs, targets for NWBrampton, and a list of communication opportunities to be conducted at the City Studio.

The proposal is for a 3 year period with an option to renew for an additional 2 years. The requested payment schedule is:

Jun 2019 - \$300,000 (Year 1 Jun-Dec 2019)
 Dec 2019 - \$300,000 (Year 2 Jan-Dec 2020)
 Dec 2020 - \$300,000 (Year 3 Jan-Dec 2021)

Year 1 requires an investment in capital equipment for the City Studio and Event Livestream coverage. Sponsorships and other funding sources will be developed by Year 2 to grow the program and reduce the city's annual sponsorship over time.

5.1 Human Resources

NWBrampton and BF currently operate with volunteer resources. Paid interns during the summer are funded through the Canada Summer Jobs program. Combined with volunteers on the BF board, the full-time equivalent of 2.5 positions are currently assigned to NWBrampton and BF.

Staff requirements go up modestly in Year 2 and 3 to service a growing base of residents and community groups.

5.2 NWBrampton

The basic measurement of success of NWBrampton is the number of active registered households in the city. Growth in 2019 is lower than the first 2 years as the program is in "sustain mode" pending staff and council's direction in regards to Resolution C150-2019. Growth in Year 2 and 3 would be significant due to dedicated staffing, development of resources in multiple languages, and marketing/promotion and ongoing communication efforts.

		2019 June	2019 End of Year	2020 End of Year	2021 End of Year
Human Resources	Full-Time Equivalents	0	1.5	2	2.5
	Canada Summer Jobs Students (FTE)	4 (0.5)	25 (3)	25 (3)	25 (3)
	Program Volunteers (FTE)	8 (2)	12 (2)	16 (2.5)	32 (5)
NWBrampton	Registered NWB Households (Year over year growth)	3,500	3,750 (7%)	6,000 (60%)	10,500 (75%)
	Languages Supported	1	2	5	8
	Annual Newspaper Volume	-	5,000	24,000	44,000
	# Home Delivered	-	3,750	12,000	21,000
CityStudio	City Event Livestream Show* Total Unique Viewers	- -	2 2,500	3 9,000	3 15,000
	City Leaders Livestream Show Monthly Unique Viewers	- -	4 1,500	12 2,000	12 2,500
	City Specific Social Videos Monthly Unique Viewers	- -	12 5,000	36 15,000	36 20,000
	Post-Council Meeting Coverage Monthly Unique Viewers	- -	9 2,500	18 5,000	18 7,500
	City of Brampton Sponsorship	\$300,000	\$300,000	\$300,000	
Region of Peel Sponsorship		-	\$40,000		
Corporate Sponsorship		-	\$25,000		

* Canada Day, Remembrance Day, Santa Claus Parade

Table 5A Summary of Proposal Metrics and Annual Forecasts

5.3 City Studio

The "City Studio" ideally is an easy to access space within City Hall for a full-time video studio that is staffed and managed by BF. The studio would be fully equipped for multi-camera live stream productions, available for council needs and priorities, city messaging needs, community media projects, mini-townhall formats/meetings, video editing/screening and communications training.

The ideal space for the City Studio is the former office occupied by the Brampton Entrepreneurial Centre on the ground floor of city hall. The space should be a minimum of 400 sq ft, unfurnished with minimal obstructions/posts and another 100 sq ft of space for a control room. BF will equip the space with lighting studio furniture, seating, video/audio equipment, retractable green screen, monitors, displays and computer equipment. Any modifications to walls/doors/entrances, networking or electrical service would be the responsibility of the City of Brampton.

The studio would serve the dual purpose as the administrative office for NWBrampton.

The summary in Table 5A lists a number of city based programming that will be conducted in the City Studio plus external event live streams (e.g. Santa Claus Parade). This list is a minimum coverage expectation. Livestreaming of events outside of the City Studio beyond the allocated 3 per year will be considered on a case-by-case basis. These external events are expected to require a host, multi-camera coverage, live streamed to multiple destinations, with custom titles, social media promotion, and social feedback options. They require significant resources and planning. City participation/facilitation/assistance

in logistics considerations for event livestreams is assumed.

5.4 Additional Benefits

The "City Studio" and mobile video capabilities including high quality bonded data communication for live-streaming to multi-destinations included as per to this proposal provides significant opportunities for the city and city departments to reach and engage with more residents with high quality dynamic content.

Departments across the city will be supported similar to the support given to community groups who seek studio time. Standard templates can be established to ensure consistency of look, style and messaging. Basic media training will be provided to all participants with opportunity for re-shoots and corporate approval processes.

Councillors, the Mayor, senior staff and VIP visitors will have a professional, comfortable and consistent environment with BF staff and dedicated volunteers to produce live or recorded video communication with residents and interviews. A fixed setup close to council chambers and council offices with good lighting, audio and backgrounds will make a lasting impression to residents and save time for Councillors who use video social media using a basic cell phone. Refer to [fb.com/bramptonfocus](https://www.facebook.com/bramptonfocus) or [fb.com/LiveTownHall](https://www.facebook.com/LiveTownHall) for past examples delivered by BF.

5.5 Community Outreach & Additional Opportunities

BF is regularly engaged with residents and groups out in the community and could easily incorporate education materials and resources from city departments to share with the community, particularly during neighbourhood meetings. A welcome package is being considered for residents who register for NWBrampton and could include materials from across the city. Further, as NWBrampton training videos are developed, they can include content from city departments.

A video production and livestreaming studio in City Hall opens opportunities to collaborate with community groups, community grant recipients and city departments throughout the year. Short social videos are relatively easy to produce, edit and distribute in a studio environment. BF is open to working to break down silos and increase the collaboration between groups, provide valuable

media training, and consider new and engaging ways to share information with residents.

This collaboration has already started with city staff involved with Vision2040 activities. Our team of volunteers and interns can provide valuable assistance to reach more and engage with more residents.

BF has previously produced Punjabi and Portuguese version of our broadcast quality Brampton Focus show. Hosts of both of these shows have gone on to host daily shows on OMNI Television. These language specific programs, with the assistance of community volunteers could resume and ensure a much broader cross-section of residents can be reached.

Finally, by having BF onsite with equipment readily available, small events, impromptu events, functions in Ken Whillans Square or even Garden Square can be covered quickly, livestreamed or broadcast soon after. It is conceivable to have a daily video broadcast to residents on what's happening across the city.

6.0 Risks

Risk	Mitigation
Cancellation of Canada Summer Jobs Program in Future Years	Summer students are not a critical resource for NWBrampton or BF. Their impact can be reduced by relying on high school volunteer hours, high school co-op opportunities, and neighbourhood group members.
Higher than expected capital costs	The equipment requirements are well known. HD rather than 4k equipment will be relied upon.
Lower NWB household adoption	Rely more on door to door canvassing with local residents and volunteers.
Minimal participation from established city media to rebroadcast	Rely on community partners (web/social) to help broaden the reach and impact of livestreams
Higher demand from city for City Studio services	Metrics listed in Table 5A are achievable. Requirements above and beyond can be negotiated separately. Community groups may incur an administrative fee to free up studio time.
Increased Cost of Newspaper production and/or delivery	Acquire more advertisers, increase advertising price. Home delivery is by Canada Post. This can be switched to local neighbourhood volunteers. Can also reduce from 2 times per year to 1 time per year.
No funding from Peel Region	Put more effort in corporate sponsors. Implement administrative fees for community groups. Fund raise (Bingo, online donations etc.)
Lower funding from Corporations	Implement administrative fees for community groups. Fund raise (Bingo, online donations etc.)

Table 3A Contrasting Effects of Neighbourhood Watch

Neighbourhood Watch in a Digital Age, pg 190, Table 91

Addendum 1 (Partnership Response RE: City of Brampton Resolution C150-2019)

Comparing Neighbourhood Watch in Mississauga

The Neighbourhood Watch program in Mississauga (NWM) operates as a program of Safe City Mississauga (SCM). SCM is a charitable organization registered in 1992 that operates within the main City Hall building in Mississauga.

In addition to NWM, SCM operates Counter-Act (anti vandalism), Crossroads, and Cyber Ambassadors. SCM also runs a Justice Luncheon, a Crime Prevention Conference, Hero Awards, Neighbours Night Out, #FutureGrad and a #WhiteRibbon Campaign.

Compared to NWB, both SCM and NWM are less proficient at social media, relying on traditional engagement and sign-up methods, and do not use video for resident training and communication. NWB and NWM interact a few times a year during sessions of Peel Police's Crime Prevention Academy. Speakers from both programs address residents from across the region. Both programs interact with Peel Regional Police in much the same way. This includes involving Peel Police's Crime Prevention Unit in meetings with neighbours and local Community Liaison Officers.

NWM underwent a significant change in the past year with the departure of a long-time program coordinator. These changes, as well as the ongoing rotational assignments of police officers is difficult for residents who like consistency in the people they deal with.

NWB operates with a working board of directors who are expected to interact regularly with residents and community leaders. As a result, the board composition of NWB changes at

a slower pace and the "face" of NWB is not any individual. NWB video training programs will soon be updated as well to reflect the voices and faces of residents. Further, the program co-ordinator/manger of NWB is expected to be versed in communications, community engagement, video communication, town-hall planning and social media. The program coordinator for NWM has traditionally been a "staff criminologist." The distinction is important as NWB relies more on the expertise of Peel Regional Police in setting direction for crime prevention activities in Brampton.

NWB also benefits tremendously from the media relationship between BF and Peel police. BF is invited to and covers many of Peel Police's media events and briefings. Many of these events are used to create highly effective video resources for new and existing NWB members, as well as the general community. NWM is not considered media and is unable to leverage the content provided by Peel Police. Unfortunately, the local print newspaper in Mississauga often leverages this content to increase readership/viewership and ad revenue ("what bleeds leads"), rather than share pertinent information that is beneficial to community building.

SCM had revenues of \$588,000 in 2016 and \$548,000 in 2017. The City of Mississauga is by far their biggest funder, followed by the Region of Peel. The Annual Report for 2018 is not currently available. In recent years, Mississauga's city council has started to ask questions about the need for NWM's programs that are not directly part of Neighbourhood Watch. Councillors in general are high supportive of NWM and participate heavily in their community events.

Addendum 2 (City of Brampton Sponsorship)

Budget Breakout

Refer to Report Page 16, Table 5A

A sponsorship of \$300,000 each calendar year from the City of Brampton to Brampton Focus Community Media is to support the items in Resolution C150-2019. This sponsorship is allocated generally below:

	2019	2020	2021
Capital Cost	50%	15%	15%
Staffing	30%	47%	57%
NWB Newspaper	5%	12%	22%
Program / Admin	15%	26%	6%

This financial sponsorship is in addition to office space within City Hall for a City Studio, including secured 24/7 access and Internet connectivity.

2019 requires the largest allocation towards **capital costs** to support the media requirements for the City Studio setup and live event coverage. This includes video, lighting, audio, communications systems, editing software/hardware, and fixtures/furnishing in support of the video/communication/training needs of the NWB city-wide expansion, and to enhance the video based communication abilities of selected City of Brampton departments.

Staffing costs includes F/T (Program Manager), P/T (admin) and contractors (e.g. camera operators for events). While BF and NWB are highly reliant on volunteers, dedicated paid staff are required to maintain quality, consistency and availability of the City Studio, live event coverage and NWB capabilities city-wide.

The **NWB Newspaper** is a twice a year printed publication for distribution to NWB members and public facilities (e.g coffee shops, rec centres, schools). A city-wide distribution will be dependent on sufficient advertising and sponsorship revenue from the local community.

Program / Admin covers costs including marketing materials (stickers, brochures, window clings etc), support services (web hosting, CRM, marketing automation, data, telephone etc), training/professional development, 3rd party consultants/professionals etc. The allocation of the sponsorship is lower in 2021 and the plan is to supplemented through other revenue sources (Region of Peel, Corporate Sponsors, Earned, NWB Newspaper Advertisers, Conference Events etc).

10.2-95

APPENDIX "8": Email from Mr. Khan to City Councillors Regarding "Nextdoor"
(dated July 23, 2019)

Saba J. Khan

From: Fazal Khan <fazal@bramptonfocus.ca>
Sent: Tuesday, July 23, 2019 7:01 AM
Subject: NWB Briefing: Nextdoor.com

Good morning.

In our continuing effort to keep you updated, I have included a briefing of a social media service that is beginning to build a base in Brampton and across Canada.

To continue receiving these updates/briefings, please reply directly to me.

Topic: **Nextdoor** (<https://ca.nextdoor.com>)

Nextdoor is a Silicon Valley company that has raised US\$250M in financing since 2011 to establish private social networks for real neighbourhoods. Residents join a specific neighbourhood (e.g. Bram West) for free and must verify their address. They are provided with online tools and the ability to send postcards to invite their neighbours to join.

Residents can then interact with their neighbours in very useful ways. This includes buy/sell, referring local contractors, raising awareness of causes, crime/safety, and politics.

Nextdoor's business model is location based ad targeting. They claim to have the largest database of homeowner information in the US. This raises many serious privacy issues, opportunities for misinformation, cyber-bullying by members etc.

Neighbourhood Watch Brampton will be following Nextdoor closely, as it presents both an opportunity (increased reach) and a competitive threat (local sponsorship revenue).

100% of Nextdoor's ad revenue is collected in the US. The minimum ad spend is

US\$25,000. However, advertising in Brampton will likely be limited until the company "hooks" residents into joining in large numbers.

10.2-97

Neighbourhood Watch Brampton will work with residents who choose to use Nextdoor for their own neighbourhoods. As with any social service (Facebook, Whatsapp), residents are free to organize as they wish.

-- end of briefing --

Fazal Khan,
Brampton Focus / Neighbourhood Watch Brampton
905.601.7185 | [Twitter](#) | [Facebook](#)

10.2-98

APPENDIX "G": Email from Mr. McLeod to Councillors (dated May 9, 2019)

10.2-99

Saba J. Khan

From: Donald McLeod <don@bramptonfocus.ca>
Sent: Thursday, May 9, 2019 5:02 PM
To: Brown, Patrick - Mayor; Paul Vicente; Williams, Charmaine - Councillor; Fortini, Pat - Councillor; Palleschi, Michael - Councillor; Whillans, Doug - Councillor; Dhillon, Gurpreet - Councillor; Santos, Rowena - Councillor; Singh, Harkirat - Councillor; Bowman, Jeff - Councillor; Medeiros, Martin - Councillor
Cc: Fazal Khan
Subject: Neighbourhood Watch / Brampton Focus

Good afternoon Mr. Mayor and Councillors,

I would like to thank you for the opportunity of presenting to Council yesterday with regards to supporting N.W Brampton and exploring the opportunity to work closely with Brampton Focus to help raise issues in Brampton.

Safety has been a huge topic for the last several years in Brampton, and continues to be at the forefront for many residents. Yet, our vision of N.W is one of, not only ensuring the safety of the residents, but informing and educating as well.

As the 9th largest city in Canada, we also need to highlight issues, and ensure that our voice is heard at the Provincial and Federal level through effective inter-action with our representatives as well.

I look forward to expanding this conversation in the future and answering any further questions.

Thank you

Don McLeod – Pres. Brampton Focus

Sent from [Mail](#) for Windows 10

10.2-100

**APPENDIX "10": Mayor Brown's Email (dated May 1, 2019) to City Clerk
Requesting that Neighborhood Watch be Added as Discussion Item on May 8,
2019 Meeting Agenda**

Saba J. Khan

From: Brown, Patrick - Mayor <Patrick.Brown@brampton.ca>
Sent: Thursday, May 2, 2019 11:50 AM
To: Fay, Peter
Subject: Re: Neighbourhood Watch

Good

Get [Outlook for iOS](#)

From: Fay, Peter <Peter.Fay@brampton.ca>
Sent: Wednesday, May 1, 2019 1:28 PM
To: Brown, Patrick - Mayor
Subject: RE: Neighbourhood Watch

Mayor Brown:

The item can be added to the May 8 Council agenda as a discussion item as follows:

Discussion Item at the Request of Mayor Brown re. **Neighbourhood Watch**.

If you have any supporting information to include with the agenda for Council reference, please let me know.

Clerk's plans to publish the May 8 Council agenda Thursday afternoon.

Sincerely,

Peter

From: Brown, Patrick - Mayor <Patrick.Brown@brampton.ca>
Sent: 2019/05/01 3:13 PM
To: Fay, Peter <Peter.Fay@brampton.ca>
Subject:

Can you add to the discussion for May 8th council

10.2-102

1) neighbourhood watch

GetOutlook for iOS

10.2-103

**APPENDIX “ 11 ”: Email from Mr. Khan Indicating that Meeting Occurred Between
Brampton Focus and Mayor Brown on November 12, 2018**

10.2-104

Saba J. Khan

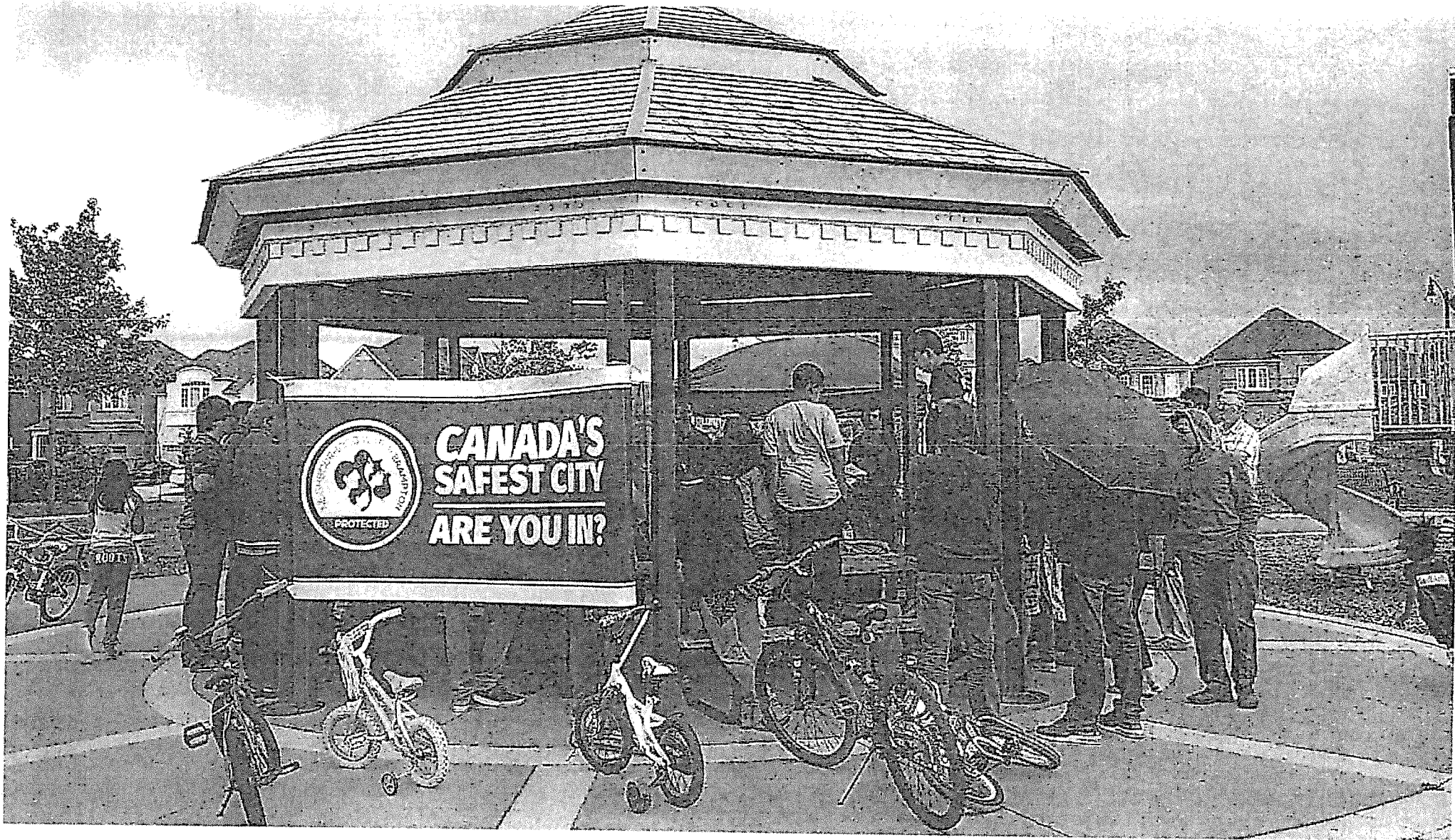
From: Fazal Khan <fazal@bramptonfocus.ca>
Sent: Wednesday, September 4, 2019 2:46 PM
To: Saba J. Khan
Cc: Muneeza Sheikh
Subject: Re: Meeting to Discuss Complaint re: Brampton Focus
Attachments: snapshot.pdf; Partnership-Response-C150-2019-BRAMPTONFOCUS-FINAL.pdf;
Partnership-Response-C150-2019-BRAMPTONFOCUS-ADDENDUM.pdf

please see attached document "snapshot.pdf". This presentation was created by myself in preparation for a 15 minute time-slot with Patrick Brown on November 12, 2018 at his temporary offices set-up by the city just after the Fall elections. The presentation centered around slide #2 (Program Snapshot). The presentation was at the request of Brampton Focus Community Media based on brief conversations with candidate Brown and his team during the 2018 election campaign, and candidate Brown's support and urgency of crime prevention (reference: https://www.youtube.com/watch?v=dZ_RgQoAaQs) Please see attached document "partnership-response-c150-2019-Bramptonfocus-final.pdf" and addendum that was prepared for city staff review in response to council motion C150-2019.

I can also provide documentation from the prior council term if necessary.

10.2-105

APPENDIX "12": Presentation Handed by Mr. Khan to Mayor Brown During Meeting on November 12, 2018



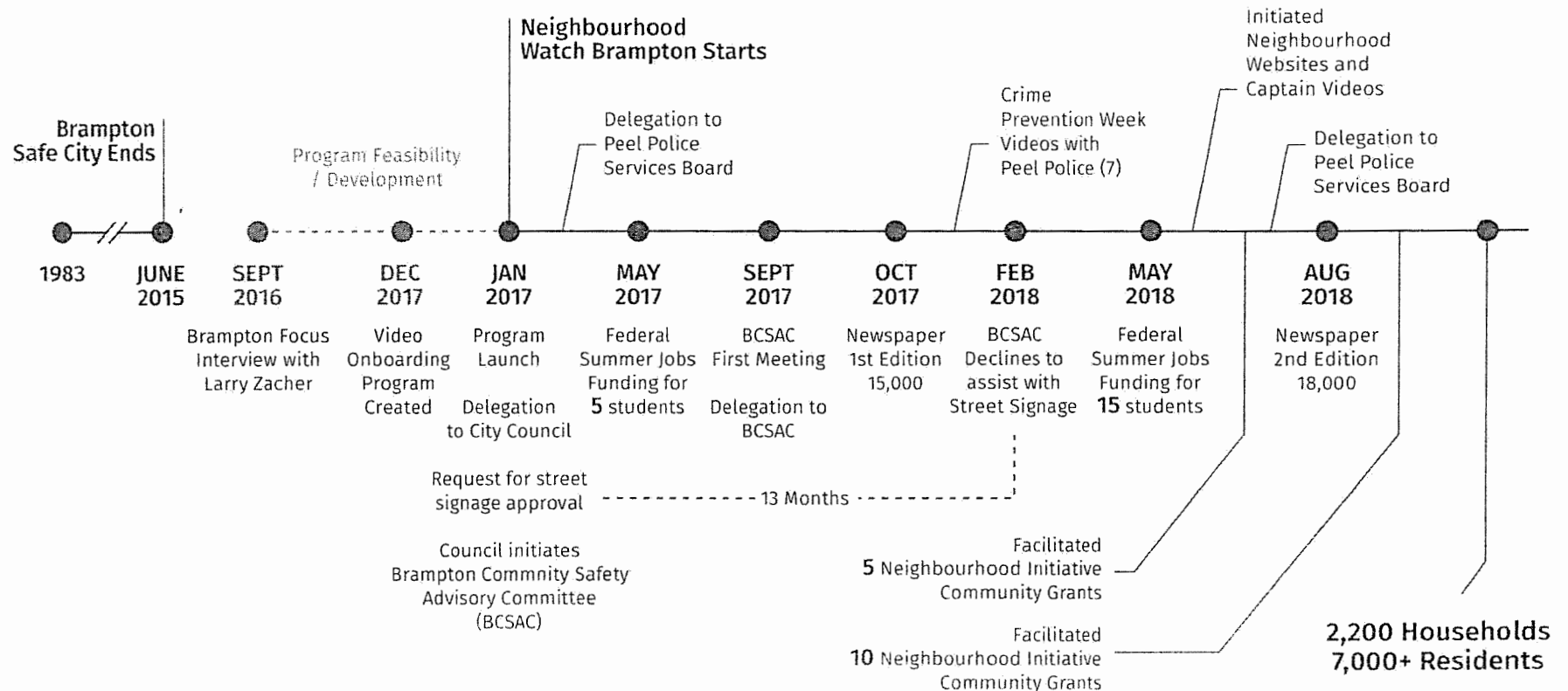


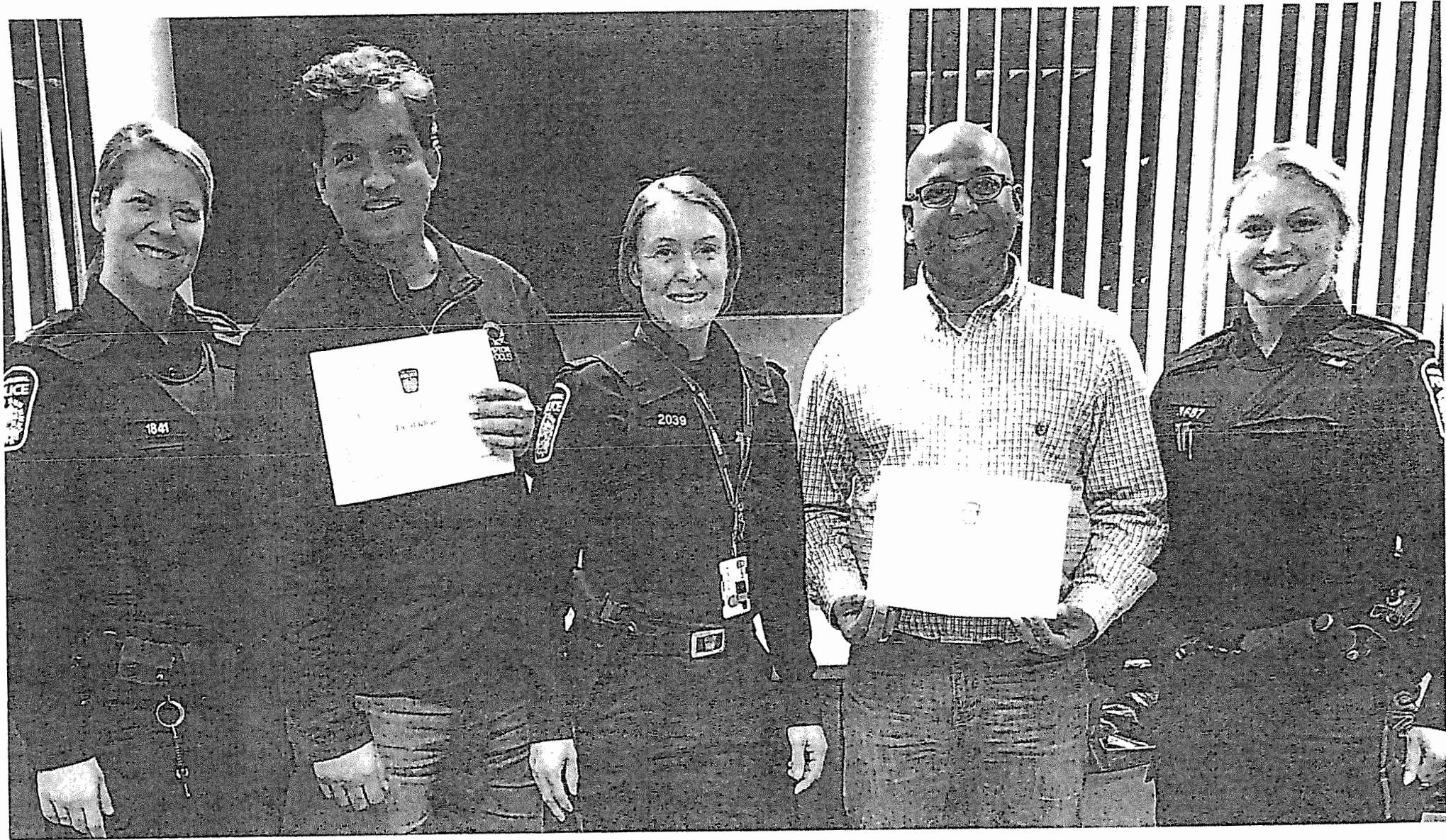
Program Snapshot

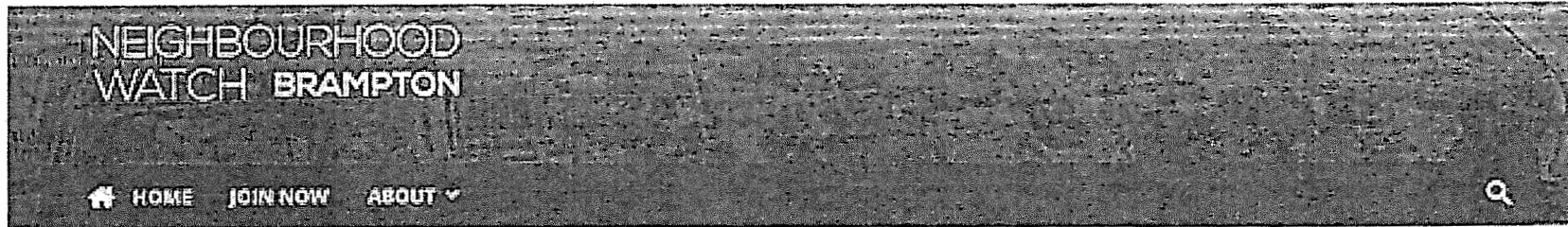
Prepared for Mayor-Elect Patrick Brown - Nov 12, 2018

Neighbourhood Watch Brampton helps to create safe and vibrant neighbourhoods through effective education, tools and networking with our diverse population. Specifically, we provide:

- ① Crime prevention education in collaboration with Peel Regional Police
- ② Neighbourhood organizational support and communication services
- ③ Public safety information in a consumable format via web, video and print media
- ④ Registration and onboarding system for residents



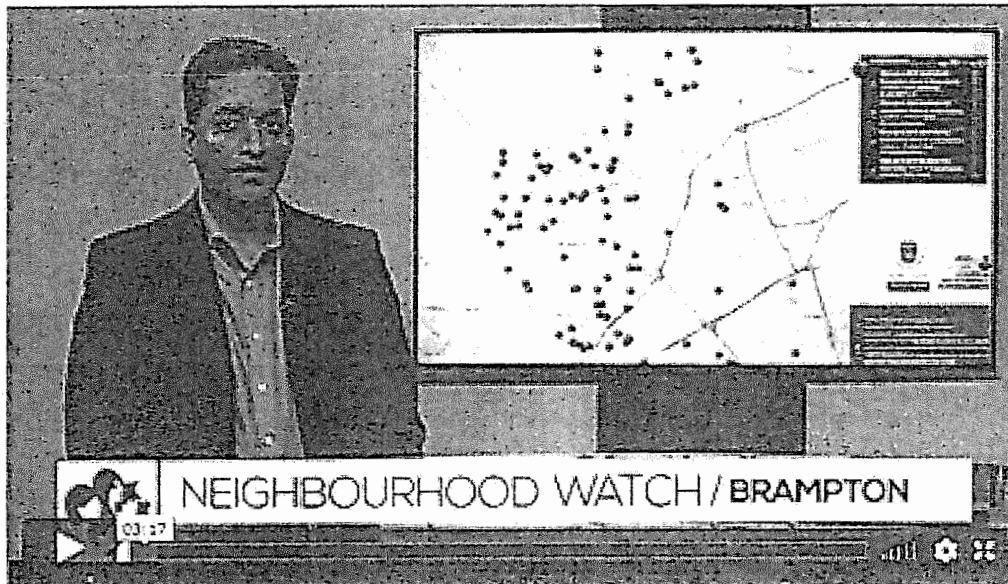




1 – Welcome

Welcome to Neighbourhood Watch Brampton! Please check your inbox for an email from us. If you did not receive an email, please check your spam folder, or send us an email at support@nwbrampton.ca

To get started right away, please watch this short introductory video...



Watch Next – Why The Program Works

Share Your Feedback...

First Name *

Email *

Feedback

Send Feedback Now

NEIGHBOURHOOD WATCH BRAMPTON

HOME JOIN NOW ABOUT



Watch Captain Overview

Thanks for your interest in becoming a Neighbourhood Watch Captain. Please watch this short video on the role of a Watch Captain. Feel free to ask us any questions.



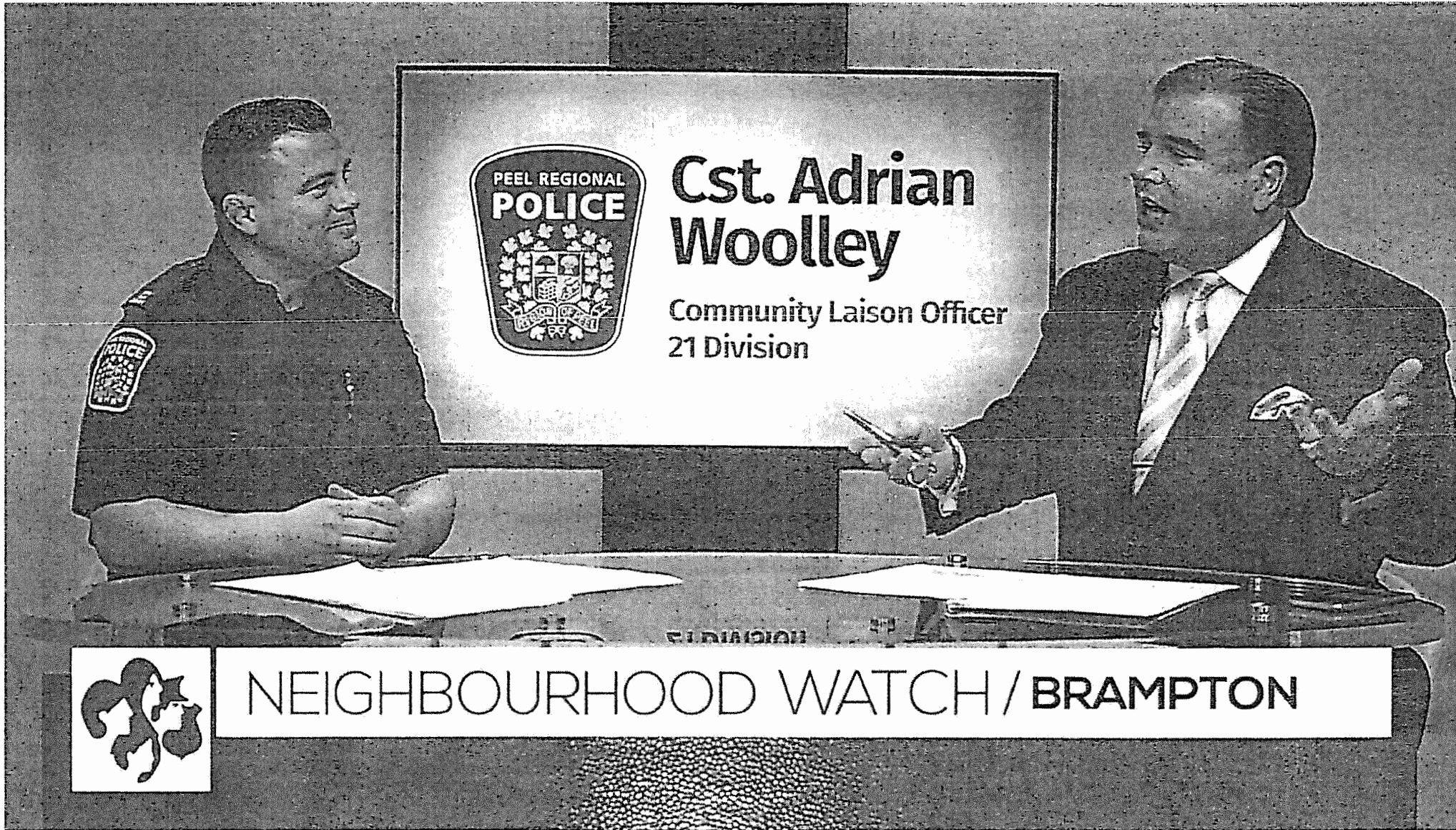
Share Your Feedback...

First Name *

Email *

Feedback

[Send Feedback Now](#)



Cst. Adrian Woolley

Community Liaison Officer
21 Division



NEIGHBOURHOOD WATCH / BRAMPTON



Crime Prevention Week 2017 - Free Academy Programs

By BFCCommunity Media | 10/19/17 | 1:11 PM

Constable Dave Lewis discusses the Cyber Academy and Crime Prevention Academies that are held throughout the year for residents.



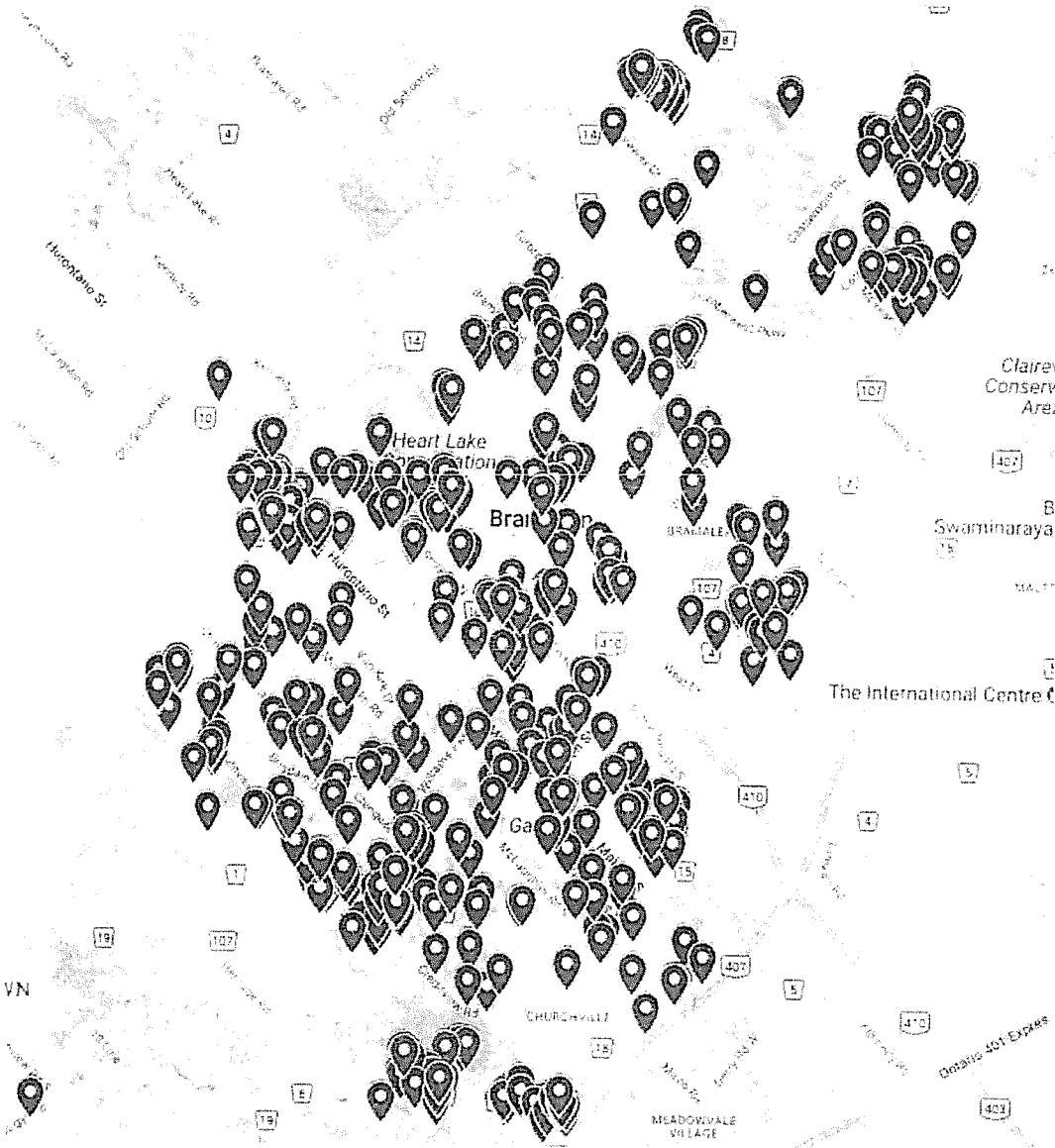
Crime Prevention Week 2017 - Break & Enter Latch Security

By BFCCommunity Media | 10/19/17 | 1:11 PM

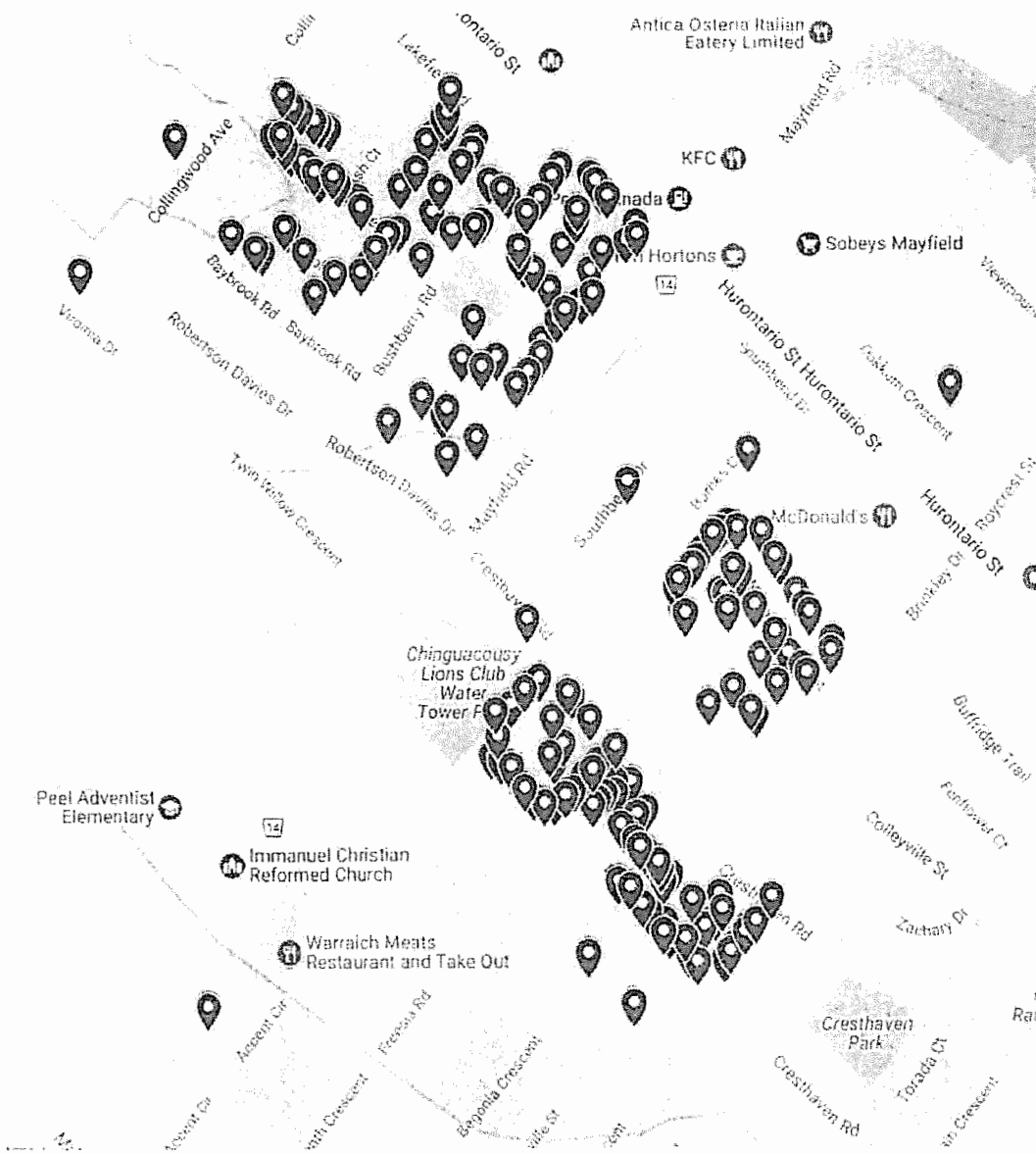
Constable Sandro Strangio from Peel Police briefly shows the benefits of a shield plate latch upgrade. Video produced by Neighbourhood Watch Brampton / Brampton Focus.

March 2018

1,500+
Households



March 2018



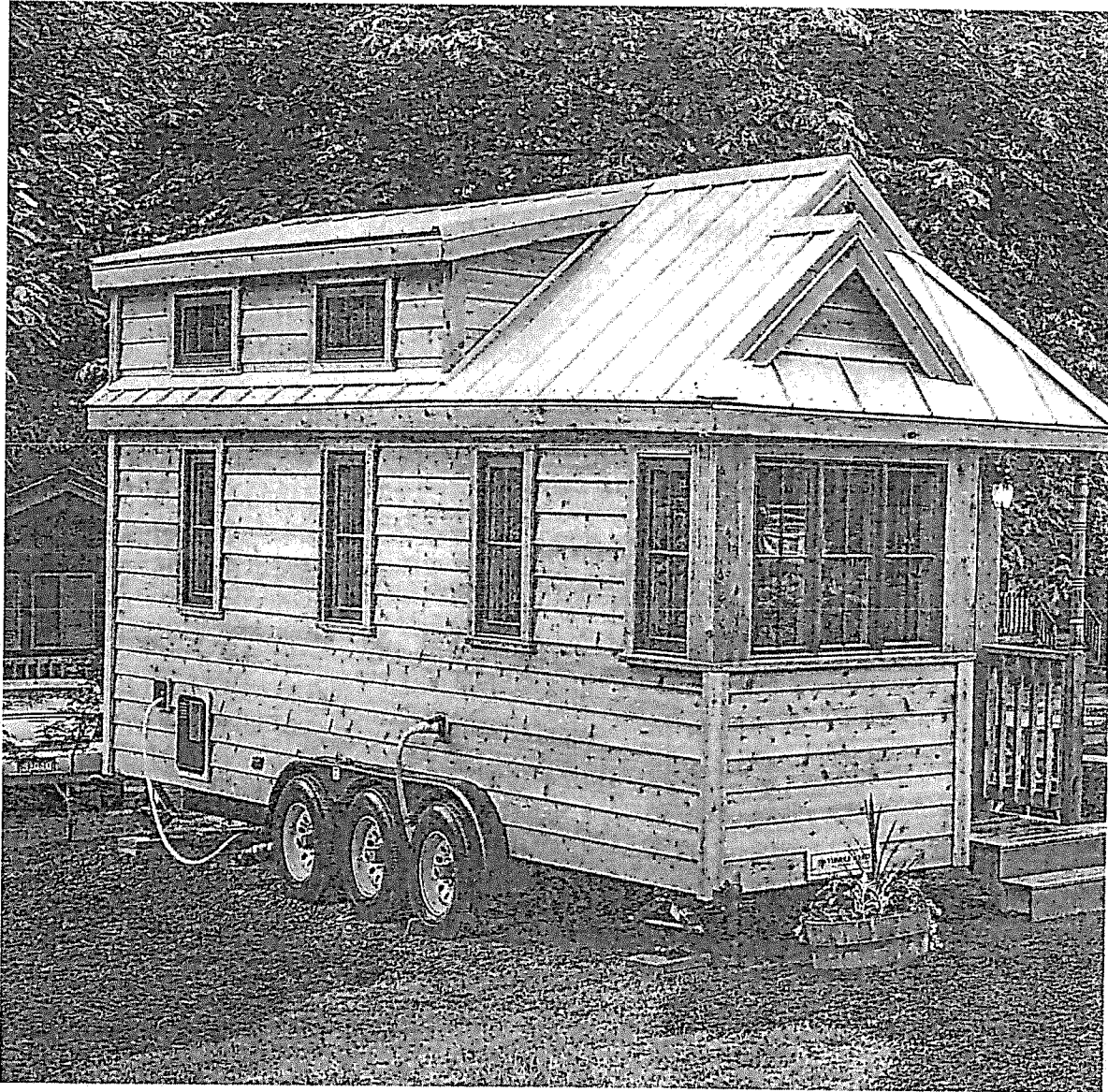
SNELGROVE

WATCH CAPTAIN
**Nikki
Cedrone**



2019

- Community App
- Prototype ready this summer (2018)
- Commercial Grade (2020)



2020

- Custom Built Tiny House Mobile Marketing Trailer
- 2018 Planning
- 2019 Fundraising
- 2020 Build

the website, you agree to our Use of Cookies.

gofundme

Search

Dashboard

Share

Tweet



GoFundMe for 5 year old Davion - Victim of a violent crime in Brampton



Manage your campaign

\$2,532 of \$10,000 goal

Raised by 63 people in 1 month

Created July 20, 2018

Neighbourhood Watch Brampton

Medical

Brampton, ON



Davion Fund - Brampton, On

Share

Tweet

178 shares

Story

Updates 2

Recent Donations

CD \$100
Chris Doyle

10.2-118





Program Funding Request

Prepared for Mayor-Elect Patrick Brown - Nov 12, 2018

Neighbourhood Watch Brampton has exceeded capacity with current resourcing. The program cannot sustain the needs of residents currently enrolled in the program, or respond adequately to requests from community partners. We are requesting a 3-year funding package from the City of Brampton as follows:

What BF was requesting

{	2019	\$270,000	1.5 Full time staff, space lease, transportation, marketing
	2020	\$245,000	2.5 Full time staff, 2x space lease, transportation, marketing
	2021	\$220,000	4.5 Full time staff, 4x space lease, transportation, marketing

Safe City Mississauga received over \$1M in funding over 3 years from the City of Mississauga and the Region of Peel between 2015-2017. The group's budget in 2016 was \$429,915.

In 2013, Brampton Safe City had an operating budget of \$554,685 (\$229,705 from City of Brampton, \$122,890 from Region of Peel), \$109,820 in donations, \$92,270 in other grants. The group employed 4 full-time, 1 part-time staff and 3 summer students.

Independent ROI study by Safe City Mississauga between 2011 and 2014 shows a cost of \$475,00 (initial investment/operating costs) and savings of \$1,680,000 through the prevention of property crimes (350% ROI).

Funding to be allocated to:

- 1 Full-time Program Manager supported by part-time Neighbourhood Organizers, students
- 1 Main Community Office / Multiple Community Meeting Spaces
- Quarterly Community Newspaper - 130,000 distribution (to the doorknob)

10.2-120

APPENDIX "13": Email Chain Between Brampton Focus and Ms. Said (dated May 21, 2019)

10.2-121



Fazal Khan <fazal@bramptonfocus.ca>

Neighbourhood Watch & Brampton Focus Discussion Follow-Up

3 messages

Said, Razmin <Razmin.Said@brampton.ca>

Tue, May 21, 2019 at 10:24 AM

To: "fazal@bramptonfocus.ca" <fazal@bramptonfocus.ca>, "don@bramptonfocus.ca" <don@bramptonfocus.ca>

Good morning,

Hope you both had a wonderful weekend.


During our meeting we had discussed additional details to the strategic partnership overview document you had provided – please let me know if you require any assistance with this.

Thank you,

Razmin Said

Community Safety Advisor | Emergency Management Office | City of Brampton

E. razmin.said@brampton.ca | T. [905.874.2645](tel:905.874.2645) | M. [647.534.4106](tel:647.534.4106)

Our Focus Is People 

Don McLeod <don@bramptonfocus.ca>

Tue, May 21, 2019 at 11:21 AM

To: "Said, Razmin" <Razmin.Said@brampton.ca>

Cc: Fazal Khan <fazal@bramptonfocus.ca>


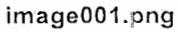
Thank you for the information. We were delayed last week with other projects and we are meeting with several other departments before submitting information that was requested.

We should be able to answer some of the questions that were discussed laye this week, or early next week at the latest.

Thank you

Don McLeod

[Quoted text hidden]

Our Focus Is People   6K

Said, Razmin <Razmin.Said@brampton.ca>

Tue, May 21, 2019 at 11:37 AM

To: Don McLeod <don@bramptonfocus.ca>

Cc: Fazal Khan <fazal@bramptonfocus.ca>

Thank you Don. Looking forward to seeing it.

10.2-122

**APPENDIX “ 14 ”: Email Chain Between Mr. Tamming and Brampton Focus
Enclosing Draft Report on Brampton Focus/Neighborhood Watch (dated June 21,
2019)**

CoB Brampton Focus Report

Tamming, Jason <Jason.Tamming@brampton.ca>

Fri, Jun 21, 2019 at 10:38 AM

To: don Mcleod <don@bramptonfocus.ca>, Fazal Khan <fazal@bramptonfocus.ca>

Don/Fazal:

Please see below the DRAFT report my team and Fire Dept. (Neighborhood Watch) have come up with to outline Brampton Focus partnerships re: Neighborhood Watch & Strategic Communications. Would welcome any comments by Monday as I'd like to put it in the system then.

It may not outline everything in your original proposal, but I think it reflects a willingness to partner together now and into the future to ensure that Strategic Communications is working with local outlets to communicate the City's news, information and events.

My mobile number is below you want to chat and can make time 2-4 today if in person is better.

Thanks again and enjoy your weekend!

Jason Tamming

Director, Strategic Communications

City of Brampton

905.874.2889 | **Office**

416.230.6384 | **Mobile**

Date: June 19, 2019

File:

Subject: Brampton Focus and Neighbourhood Watch Brampton
Collaboration Opportunities – All Wards

Contact: Jason Tamming, Strategic Communications Director
905-874-2889

10.2-124

Razmin Said, Community Safety Advisor
905-874-2645

Recommendations:

1. That the report from Jason Tamming, Director, Strategic Communications and Razmin Said, Advisor, Brampton Fire and Emergency Services, dated June 19, 2019, to the City Council Meeting of July 10, 2019, re: **Brampton Focus and Neighbourhood Watch Brampton Partnership – All Wards (File #)**, be received; and
2. Should Council direct staff to proceed, that a third of the Public Safety Project fund be approved for the proposed one-year pilot for the trial expansion of the Neighbourhood Watch Program managed by Brampton Focus. (1/3 of \$375,000)
3. That Council encourage Brampton Focus to consult with Safe City Mississauga to learn from their seasoned neighbourhood watch program.
4. That Council encourage Brampton Focus to consult with Peel Regional Police on the expansion of the neighbourhood watch program.
5. That Brampton Focus actively search and attain alternative sources of funding to reduce the reliance on City funds in future years to ensure a sustainable neighbourhood watch program.
6. Add in any strat comm recommendations

Overview:

- A healthy and safe city has been identified as a 2018-2022 Term of Council priority, which is facilitated by strong community partnerships in order to improve community safety and the inherent perceptions of community safety.
- Staff recognize the talent and dedication of Brampton Focus for engaging the community in Brampton.
- Should Council approve, staff propose a multi-faceted one year pilot program to explore the impact of the expansion of the Neighbourhood Watch Brampton program across the City of Brampton.
- Should Council approve, staff will collaboratively organize an Advocates Workshop in Q4 2019 to assist with program development of the neighbourhood watch program.
- A one-year pilot partnership whereby the City will explore ways to utilize Brampton Focus to enhance City messaging

Background:

At the May 8, 2019 Council meeting, through a discussion item from Mayor Brown, a delegation from Don McLeod and Fazal Khan led to a motion involving both Brampton Focus (BF) and Neighbourhood Watch Brampton (NWB). The motion has directed staff to explore possible expansion of the NWB program city-wide through leveraging partnerships as well as exploring opportunities to utilize Brampton Focus to advance City messaging.

Though Brampton Focus is the parent organization of Neighbourhood Watch Brampton and are separate in their functions, their operations are at times parallel. This report will address the

following matters:

Brampton Focus

Brampton Focus (BF) launched in 2015 as a community group and incorporated in September 2016. The City sends BF official City Media Releases, Service Information Updates, Media Advisories and other media event invitations. During media events, the City has assisted BF with on-site tech requirements and interview requests. The City has received two formal media enquiries from Brampton Focus from December 2017- June 2019.

Neighbourhood Watch Brampton

Neighbourhood Watch Brampton (NWB) was established in January 2017 under the management of Brampton Focus. In late 2017, NWB approached the City for signage and after a thorough assessment; a staff report to the Brampton Community Safety Advisory Committee suggested that NWB explore other funding sources.

In May and June of 2019, City staff met with representatives from Brampton Focus to gain a better understanding of their programs. Their proposed partnership, attached as Appendix A, included a recurring annual financial ask of \$300,000 for the expansion of the Neighbourhood Watch Brampton program as well enhancement of their current Brampton Focus capabilities.

Current Situation:

Strategic Communications welcomes the opportunity to further collaborate with local media outlets. Strategic Communications are interested in sharing City information, news, and stories of interest with the community and realize that is best accomplished through strong and effective relationships with media partners. Strategic Communications is undertaking a number of initiatives to enhance our communications through social media, video, and multilingual channels.

Strategic Communications works closely with media outlets to respond to media inquiries, share content, and to advertise information and civic events. Central tenets of the approach are: to provide factual and responsive answers to media outlets, to share high quality and factual content quickly with outlets and stakeholders, and advertise equitably across a variety of mediums and the top 4 census languages plus French, as previously directed by Council.

The problem oriented policing concept of the Crime Triangle states three factors that contribute to the occurrence of a crime: *desire* of a criminal to commit the crime, *target* of the criminal's desire, and the *opportunity* for the crime to be committed. Standard neighbourhood watch programs focus on addressing the opportunity factor by preventing and reducing property crimes through education and enhancing neighbourhood connections. This form of participatory policing aimed at neighbourhood crime prevention has both positive and negative outcomes. Interpersonal surveillance may cause increased feelings of anxiety for those individuals that are not comfortable with extroverted interactions. On the contrary, increased interpersonal surveillance may also promote a collective culture of looking out for each other.

After consulting with multiple municipalities, staff have taken into account the different variations of neighbourhood watch programs to assess how to proceed. Safe City Mississauga has operated

10.2-126

Mississauga's Neighbourhood Watch Program since 1992; it is now one of the three main programs they actively manage. Their program uses a researched based approach with a focus on mobilizing neighbourhoods into becoming active and engaged communities, unified in crime prevention and safety. Their solid partnership with the University of Toronto Mississauga have allowed them to access and incorporate the latest research on criminology and socio-legal

developments and trends. Mississauga Safe City also has a strong working relationship with Peel Regional Police, which has allowed for an environment to grow their neighbourhood watch program.

Staff Proposal – NWB Expansion

In assessing the feasibility of a partnership to expand NWB city-wide and based on Council direction, staff propose a multi-stage approach to exploring the expansion of the NWB program across the City. Given the lack of Brampton specific data, a pilot program will allow for an opportunity to assess the outcomes and metrics of the NWB program before future financial and resource commitments are made.

During the 2019 Budget process, Council passed resolution, BC003-2019, at its Special Meeting of March 27, 2019, that staff be directed to establish a Public Safety Project Fund, with initial funding of \$300,000 from the General Rate Stabilization Reserve, for the purpose of funding community safety initiatives, as determined by Council. Awaiting Council approval, the proposed one-year NWB partnership pilot includes monthly staff consultations to ensure standardization across the program, a one time Advocates Workshop, as well as one third of the Public Safety Project fund.

During the first quarter of the pilot program, a workshop for all existing Neighbourhood Captains, now known as Advocates will be held. This workshop will allow NWB to set a path forward as well as explore options for program enhancement to inclusively meet the needs of all residents across Brampton. In collaboration with City staff and any other relevant stakeholders, such as Peel Regional Police, NWB will develop the necessary objectives and metrics to provide sufficient data for outcomes to be measured. These include:

- Identify metrics and collection methods to gauge program success;
- Evaluate engagement of advocates;
- Determine the specific NWB priorities for the pilot period;
- Identify opportunities to increase communication and membership;
- Identify NWB desired community outcomes

The proposed monetary investment will allow Brampton Focus to expand by hiring staff, such as a project manager, for the NWB program for one-year and funding for promotional materials (ex. newsletters), technology enhancements, event needs, administrative costs, and office supplies.

The components of the one-year NWB partnership pilot will allow for an opportunity to evaluate and enhance the current program as well as ensure an equitable allocation of resources across the City. Should Council direct staff to proceed with the pilot, staff request BF to provide the following towards the end of the pilot:

10.2-127

- *Program Outcomes*
 - Increased feelings of security for participating members
 - Increased feelings of connectedness to neighbours
- *Metrics*
 - Number of participants
 - Number of Advocates
 - Number of neighbourhood launches
 - Location of active neighbourhoods
 - Number of Crime Prevention Through Environmental Design (CPTED) presentations administered
 - Participant survey results
 - Change in property crime statistics in participating neighbourhoods

To accurately capture the above metrics, it is strongly advised NWB collaborate with Peel Regional Police to obtain property crime statistics and related information.

In addition, staff encourage BF/NWB to collaborate and formalize partnerships with other community and service organizations to provide a holistic solution based approach for residents.

These partnerships could assist the NWB program in improving the community's perception of community safety as well as provide an opportunity to share the cost of programming. Staff recommend NWB actively search and attain alternative sources of funding to reduce the reliance on City funds in future years and to ensure a sustainable community safety program.

Staff will assist Brampton Focus to complete a report to Council in the quarter following the end of the trial period. Presuming the trial period begins in Q3 2019, Council can expect a report by Q4 2020.

Staff Proposal – Media Partnership

Strategic Communications proposes a one-year Brampton Focus pilot project:

- Strategic Communications to consider Brampton Focus as a video vendor for select Corporate events. Brampton Focus has been retained by Strategic Communications to support the City's Canada Day celebrations at Chinguacousy Park with pre and post-event video content as well as livestreaming interviews and content of residents, artists, and elected officials during the event. Strategic Communications will assess the results and consider suitable future events for partnership, some of which may include time sensitive events.
- Strategic Communications to provide Brampton Focus booking access to a potential media studio at City Hall (date to be confirmed). This will be granted on a first come first

10.2-128

served basis to all mainstream, local and ethnic media. It is at Council's discretion if Brampton Focus are to be offered a regular slot at the upcoming City Hall media studio.

- Strategic Communications to share applicable Brampton Focus videos on corporate social media channels.
- Strategic Communications to offer Brampton Focus summer interns (funded by the Canada Summer Jobs Program) opportunities to shadow the Media and Engagement team in Strategic Communications team.
- Strategic Communications to connect with and collate feedback from Brampton Focus as part of a Mainstream Media Roadshow (similar to our Ethnic Media Roadshow)
- Recognizing we're committed to a Healthy and Safe City, Strategic Communications to work with Neighbourhood Watch Captains/advocates to establish an emergency communications network, to disseminate emergency information during high impact scenarios such as weather events or power outages.

Opportunities for Involvement

The talent and dedication of BF staff is recognized by the City, especially as it relates to:

- Initial engagement of residents through NWB launches;
- Rallying residents to support a worthy cause (i.e. raising funds to support the mother of Riya Rajkumar); and
- Creating content relevant to events and community concerns (i.e. Regional government review).

As such, City staff have requested support from BF with multiple events with the mutual goal of enhancing community engagement. In addition to the proposal mentioned above, staff are providing the following opportunities:

- *NWB Launch Support from Fire and Emergency Services*

Brampton Fire and Emergency Services staff will attend future NWB launch meetings to provide more information on fire safety for residents.

- *Fire and Emergency Services Blitz*

BF/NWB will be invited to film a future fire safety blitz with the Fire Chief and BFES staff personally informing residents on the importance of fire safety in their homes.

- *Brampton Community Safety Advisory Committee*

As per Council direction, one permanent member from NWB has been added to the Brampton Community Safety Advisory Committee to act as a representative and to enhance their involvement in City matters related to community safety. Staff will update the Terms of Reference to reflect this amendment.

**APPENDIX "15": Email Chain Between Ms. Said and Mr. Khan Regarding
"Neighborhood Watch Discussion" (dated October 26, 2018)**

10.2-130



Fazal Khan <fazal@bramptonfocus.ca>

Neighbourhood Watch Discussion

1 message

Said, Razmin <Razmin.Said@brampton.ca>
To: "fazal@bramptonfocus.ca" <fazal@bramptonfocus.ca>

Fri, Oct 26, 2018 at 12:05 PM

Hi Fazal,

As per our phone conversation, I have scheduled this meeting for us to connect and discuss alignment of some of our priorities.

We will be meeting at the City of Brampton West Tower (41 George Street South); underground parking is available and I will validate your parking.


Please let me know if you need anything. Looking forward to meeting.

Thank you,


Razmin Said

Community Safety Advisor | Emergency Management Office | City of Brampton

E. razmin.said@brampton.ca | T. [905.874.2645](tel:905.874.2645) | M. [647.534.4106](tel:647.534.4106)

Our Focus Is People 

Please review the City of Brampton e-mail disclaimer statement at:
www.brampton.ca/en/Info-Centre/Pages/Privacy-Statement.aspx

 **invite.ics**
3K

10.2-131

APPENDIX "10": Screenshots of City's Lobbyist Registry

Lobbyist Search

Keyword

Keywords

Person(s) Lobbied

Individual Person(s)

Lobbyist

Donald McLeod

Subject Matter Category

Affected Ward

Clear

Search

Public Lobbyist Profiles with Subject Matters

[View All Lobbyist Profiles](#)

Show 1 entries

 Lobbyist Name - Type	 Subject Matter Category - Topic	Lobbied Person(s)	Status
--	---	-------------------	--------

No data available in table

Showing 0 to 0 of 0 entries

[Previous](#) [Next](#)

Lobbyist Search

Keyword

Keyword

Person(s) Lobbied

Person(s) Lobbied

Lobbyist

Fazal Khan

Subject Matter Category

Affected Ward

Clear

Search

Public Lobbyist Profiles with Subject Matters

[View All Lobbyist Profiles](#)

Show 0 entries

 Lobbyist Name - Type	 Subject Matter Category - Topic	Lobbied Person(s)	Status
--	---	-------------------	--------

No data available in table

Showing 0 to 0 of 0 entries

[Previous](#) [Next](#)



Lobbyist Search

Keyword

Keywords

Person(s) Lobbied

Lobbied Person(s)

Lobbyist

Lobbyist Name

Subject Matter Category

Subject Matter Category

Affected Ward

Affected Ward

Clear

Search

Public Lobbyist Profiles with Subject Matters

[View All Lobbyist Profiles](#)

Show 10 entries

Lobbyist Name - Type	Subject Matter Category - Topic	Lobbied Person(s)	Status
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No data available in table

Showing 0 to 0 of 0 entries

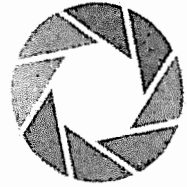
Previous Next

10.2-135

**APPENDIX “17”: Invoice from Brampton Focus Charged to City of Brampton for
Canada Day Coverage (\$9,887.50)**

10.2-136

Brampton Focus Community Media
30 Mallard Cres
Brampton ON L6S 2T5
416-899-6230
don@bramptonfocus.ca
www.bramptonfocus.ca/contact
GST/HST Registration No.: 75291 9290



INVOICE

INVOICE TO
City of Brampton
2 Wellington Street West
Brampton, ON L6Y 4R2

INVOICE # BF1017
DATE 11/06/2019
DUE DATE 11/06/2019
TERMS Due on receipt

ACTIVITY	QTY	RATE	AMOUNT
Event Coverage Canada Day Video Coverage Package including pre, live, and post- event deliverables as per Brampton Focus Estimate 1902rev1	1	8,750.00	8,750.00

June 11, 2019 - Email authorization received by Jason Tamming
(Jason.Tamming@brampton.ca)

SUBTOTAL	8,750.00
HST (ON) @ 13%	1,137.50
TOTAL	9,887.50
BALANCE DUE	\$9,887.50

TAX SUMMARY

RATE	TAX	NET
HST (ON) @ 13%	1,137.50	8,750.00

10.2-137

APPENDIX "18": Corporation Point in Time Report for Brampton Focus (as of July 10, 2019)

10.2-138

Province of Ontario
Ministry of Government Services

Date Report Produced: 2019/07/18
Time Report Produced: 13:47:40
Page: 9

Certified a true copy of the data as recorded on the Ontario Business Information System.

Barbara Shackitt
Director
Ministry of Government Services
Toronto, Ontario

CORPORATION POINT IN TIME REPORT As of: 2019/07/10

Ontario Corp Number

Corporation Name

1959882

BRAMPTON FOCUS COMMUNITY MEDIA INC

Active Administrator:
Name (Individual / Corporation)

PAUL
VICENTE

Address

8 WELLINGTON ST EAST

BRAMPTON
ONTARIO
CANADA L6W 1Y2

Date Began

2016/09/17

First Director

NOT APPLICABLE

Designation

DIRECTOR

Officer Type

Resident Canadian

Y

10.2-139

APPENDIX "i^a": Copy of Mr. McLeod's Letter to Councillor Vicente (dated August 8, 2019) Regarding Resignation and Clerical Error

10.2-140

BRAMPTON FOCUS

30 Mallard Cres Brampton Ontario L6S 2T5 | 416.899.6230 | bramptonfocus.ca

August 8, 2019

Councillor Paul Vicente
Regional Councillor, Wards 1 & 5
City of Brampton
2 Wellington St W
Brampton ON L6Y 4R2

Dear Councillor Vicente:

We have reviewed your email correspondence dated Aug 7, 2019 requesting an explanation of documents sent to you in relation to your status as a Board of Directors member of Brampton Focus Community Media Inc.

Our records show receipt of a resignation letter from you, and our board's **acceptance of your resignation effective Dec 22, 2017**. As you know, the Board of Directors for Brampton Focus has operated since Dec 22, 2017 without your involvement in our decision making, direction, strategy, day to day activities and meetings.

Please note that upon receiving your resignation, I personally filed with the Ontario Ministry of Government Services a notification of your end of tenure. Unfortunately, having followed up with the Ministry on August 7, 2019, I can confirm that their records have not been updated and you (as well as others) are incorrectly listed as a board member. I am in contact with the Ministry to find out why this occurred and to ensure you are removed promptly.

Please accept my apology for any inconvenience this filing error may have caused you. We are thankful for your effort as a volunteer in establishing Brampton Focus and the lasting positive contribution of your effort.

Sincerely,



Donald McLeod
President/Chair - Brampton Focus Community Media Inc.
416-899-6230 | don@bramptonfocus.ca

10.2-141

APPENDIX "20": Email from Councillor Vicente to Brampton Focus Providing
Notice of Resignation (dated December 22, 2017)

10.2-142

Subject: Moving forward.

From: Paul Vicente <paulv@mediamasters.com>

Date: 12/22/2017, 12:14 PM

To: "Brampton Focus - All Dir." <directors@bramptonfocus.ca>

Dear Brampton Focus,

As 2018 approaches, new opportunities are on the horizon. For this reason, I am confirming today that after spending three impactful years as a Founding Director of Brampton Focus, I am stepping down from the Board. Since its creation, Brampton Focus has grown to become a respected community media organization in Brampton, and I am proud to have been part of an amazing team. I wish you all at Brampton Focus the best in the future, and thank you for such an incredible journey.

Regards,
Paul Vicente

10.2-143

APPENDIX "2": Councillor Vicente's Facebook Post Indicating His Resignation
(dated December 22, 2017)

Paul Vicente - Stand UP for Brampton
Published by Paul Vicente · December 22, 2017

As 2018 approaches, new opportunities are on the horizon, and for this reason, I am announcing today that after spending three impactful years as a Founding Director of Brampton Focus, I am stepping down from the board. Since its creation, Brampton Focus has grown to become a respected community media organization in Brampton, and I am proud to have been part of an amazing team. I wish everyone at Brampton Focus the best in the future.




3,900 People Reached | 685 Engagements | Boost Post


Like Comment Share



Most Relevant


- Sophia Brown Ramsay Thank you so much Paul Vicente for showing up, standing up and looking out for the community... thank you my friend for the Example!
- Paul Vicente - Stand UP for Brampton Thank you, Sophia Brown Ramsay; Great leaders like you have led the way and inspire us to do more! We love Brampton and want to see this city prosper!
- Irfan Ali
- Jayne Walker McGee Great job Paul I've enjoyed the posts. As a fourth generation Brampton native it's imperative to keep Brampton alive! Merry Christmas and all the best in the new year!
- Fayyaz Chaudhry Wish you best of luck
- John Bourne Spry Hi Paul
It has been a pleasure working with you over the many years you have been with Brampton Focus... See More
- Susan Jackson Well I have always found Focus and Stand up for Brampton very useful and Informative Thank you Best of luck in new pursuits!
- Behbood Hussain Even though I have known you for a limited time on FB, your posts have always been transparent and very informational. I hope you keep on "standing UP for Brampton" in your new challenge.
- Paul Vicente - Stand UP for Brampton Thank You. The work at Stand UP for Brampton continues!



This was a publicly made announcement on social media few minutes after sending email to BF direct



-  **Mark Cashin** Great work you should be proud.


Like Reply 
-  **Ronnie Prevedel** Good luck 🍀


Like Reply 
-  **Dipak Patel** all the best into 2018 stay in touch with the YOUNG generation BRAMPTON is kind of growing now


Like Reply 
-  **Simone Logozzo** You will be missed. I really appreciate all the work you do to make the city better.



Like Reply 
-  **Paul Vicente - Stand UP for Brampton** Thank you, I will still be here. Merry Christmas!



Like Reply  Paul Vicente
-  **Holly Adam** Hmm, is seeking a seat at the round table in your future? all the best



Like Reply 
-  **Paul Vicente - Stand UP for Brampton** Thank you, Holly! Merry Christmas!


Like Reply  Paul vicente
-  **Jotvinder Sodhi** Wish you good luck 🍀



Like Reply 
-  **Irfan Ali** All the best and you've done a wonderful job.



Like Reply 
-  **Maria Mandjik** I will miss you but I wish you all the Best. Merry Christmas.



Like Reply 
-  **Paul Vicente - Stand UP for Brampton** Thank You, Maria! I will still be here every day! We have something really special for you tonight or tomorrow! Merry Christmas!



Like Reply  Paul Vicente
-  **Nazzarena Cwihun** Wish you all the best with ur new chapter. Not sure who the ladies are in the forefront & the men in the background are. Anywhol-- Here's wishing everyone a Merry Christmas & Happy New.


Like Reply 
-  **Paul Vicente - Stand UP for Brampton** Their names are listed now. Thank you! Merry Christmas!


Like Reply  Paul vicente
-  **Ivan Macri** Good job with Brampton Focus ... Enthusiastic to find out what's 2018 brings to your horizon ... All the best


Like Reply 
-  **Paul Vicente - Stand UP for Brampton** Thank you, Sir! The best to you and your family.

Like Reply  Paul Vicente
-  **Sukhjot Naroo** Which ward are you contesting from ?

Like Reply 
-  **Paul Vicente - Stand UP for Brampton** As you know, Naroo Ji, it is Christmas and May is still some time away!

Like Reply  Paul Vicente
- A.** **Sukhjot Naroo** Paul Vicente - Stand UP for Brampton count me in

Like Reply 
-  **Paul Vicente - Stand UP for Brampton** Thank you, Sir. You're in!

Like Reply  Paul Vicente

10.2-146

APPENDIX "22": Provision from Brampton Focus' By-law Indicating Requirements of Resignation

10.2-147

- Candidates or their designate, are allowed to make a brief presentation on the day of elections, this must be no longer than 4 minutes in length, without visual aids;
- The CRO will be the master of ceremonies;
- The CRO may remove campaign material from the room where the forum is being held as is necessary to ensure that all those attending will be provided with an unbiased view of the proceedings;
- Each candidate will speak for three (3) minutes. Lots will determine order;
- A question period will follow. If a question is directed at all candidates, candidates will answer in rotating order, starting with the candidate who gave her speech first. Answers may not exceed one (1) minute;
- The CRO reserves the right to limit the question period;
- The CRO reserves the right to disallow questions which are deemed inappropriate;
- When there are no further questions, candidates will make a one (1) minute summation, in reverse order of the first speaking order;
- Voting shall take place after the presentations;

7.9 Vacancies

- Vacancy nominations for new Directors may be received from present Board Members by the Secretary seven (7) days in advance of a Board meeting. These nominations shall be sent out to Board Members with the regular Board meeting announcement, to be voted upon at the next Board meeting;
- Any vacancy in a Director position, however caused, may be filled by a majority vote of the remaining Directors so long as a quorum of Directors remains in office. A Director so elected shall remain in office until the next meeting at which Directors are to be elected.
- The Directors shall not fill a vacancy in the manner specified in this clause during the sixty (60) day period immediately preceding an annual general or special meeting;
- If there is not a quorum of Directors, the remaining Directors shall forthwith call a meeting of the Members to fill the vacant Director positions;

7.10 Removal of a Director

A Director shall automatically cease to hold office if:

- A resolution to that effect is passed by a two-thirds majority of the Members of the Corporation voting at a meeting duly called for that purpose; or
- The Director otherwise ceases to be eligible as a Member under the terms of Article 6 of these By-laws;
- Resignation from the Board must be in writing and received by the Secretary. A Board Member shall be dropped for excess absences from the Board if she has three absences with out due notice from Board meetings in a year;

7.11 Conflict of Interest of Directors

Where a Director, either on her behalf or while acting for, by, with or through another, has any pecuniary or personal interest, direct or indirect, in any matter, or otherwise has a conflict of interest, as a Director, she:

- Shall disclose her interest fully at a meeting of the Directors in the manner prescribed by the Canada Corporations Act;
- Shall disclose her interest and the general nature thereof prior to any consideration of the matter in the meeting;
- Shall not take part in the discussion of or vote on any question in respect of the matter; and,
- Shall not in any way whether before, after or during the meeting to influence the voting on any such question. The pecuniary or personal interest, direct or indirect, of an immediate family Member shall, if known to the Director, be deemed to be also the pecuniary interest of the Director;

Every declaration of interest and the general nature thereof shall be recorded in the minutes of the meeting;

10.2-148

7.12 Remuneration of Directors

The Directors shall receive no remuneration for acting as such and no Director shall directly or indirectly receive any profit from her position. Directors may receive reasonable compensation for expenses incurred by them in the normal course of their duties;

7.13 Attendance at Board and Committee Meetings

Each Member shall be present for at least 2/3 of all Board and respective Committee meetings within the fiscal year or removal proceedings under Article 8.08 will automatically be enacted;

7.14 Notice of Meetings

All meetings shall be provided with notice at least 30 days in advance or as specified in the Article 18 - Notices;

7.15 Quorum

Quorum for Board meetings shall be 30% of the Board of Directors holding positions in attendance in person or via teleconference. If quorum is reached at any point during a meeting, all Board votes and decisions thereafter until adjournment shall be deemed to be made under quorum;

7.16 Minutes

Board minutes shall be distributed within 30 days of the Board meeting to the Board of Directors through electronic mail. All minute's discrepancies are to be brought to the Board secretary for amendment by the end of the next Board meeting. The Board will vote on and approve minutes of the last meeting at its next meeting. Minutes of Committees will be the responsibility of the Committee Chair, who will provide such minutes for Board review upon request;

7.17 Succession of the Chair

- Should the Office of BF President become vacant, for any reason, the Vice-Chair will assume the office and a by-election will be held to replace the Vice-Chair;
- The level of succession, in case the Vice-President is removed along with the President, due to the reasons, is deemed as follows:
 1. Treasurer
 2. Secretary
 3. Executive Director
 4. Youth Engagement Officer

**APPENDIX "23": Email Exchanges Between Mr. McLeod and Ministry of
Government Services and Supporting Documents**

From: Don Mcleod
Sent: August 14, 2019 1:09 PM
To: Grant, Wendy (MGCS)
Subject: Re: Directors

10.2-150

There are only 3 directors - Donald McLeod(me) - President
Karla Bailey - Secretary
Cassian Joesph - Treasurer

Michael Gyovai - Hardeep Kalirah - Paul Vicente - Fazal Khan are all off - There are only 3 Directors - I hope this helps -
You can also call me 416-899-6230
Thanks

On Wed, Aug 14, 2019 at 1:04 PM Grant, Wendy (MGCS) <Wendy.Grant@ontario.ca> wrote:

Hello,

Just confirming the positions for Michael Gyovai, are they Director, vice-president and vice-chair.
Please let me know at your earliest convenience.

Best regards,
Wendy Grant

From: Don Mcleod <don@bramptonfocus.ca>
Sent: August 14, 2019 12:27 PM
To: Grant, Wendy (MGCS) <Wendy.Grant@ontario.ca>
Subject: Re: Directors

Thank you for the update. Can you also let me know the correct way to fill it out, as I don't want to screw it up again.
Will you also be adjusting the Directors listed to just the 3 and take everyone else off?
I'm sorry for all the adjustments on this, but I assumed everything was correct when I submitted it, as no one really got
back to me.

I really do appreciate your help. This has created a lot of difficulty for me.
Thanks
Don

On Wed, Aug 14, 2019 at 12:31 PM Grant, Wendy (MGCS) <Wendy.Grant@ontario.ca> wrote:

Good Afternoon Mr. McLeod,

10.2-151

I will need to redo the Form 1 CIA, as it appears the Form 1 submitted was not completed correctly.
I will notify you once it is completed.

Kind regards,
Wendy Grant

From: Don Mcleod <don@bramptonfocus.ca>
Sent: August 13, 2019 11:18 AM
To: Grant, Wendy (MGCS) <Wendy.Grant@ontario.ca>
Subject: Directors

Good morning Wendy,
Am just following up on changes to Directors listing.
Don

From: [Donald McLeod](#)
Sent: August 7, 2019 6:08 PM
To: [Grant, Wendy \(MGCS\)](#)
Subject: RE: Corp #1959882

Sorry...forgot that.

— Sent from [Mail](#) for Windows 10

From: [Grant, Wendy \(MGCS\)](#)
Sent: August 7, 2019 4:38 PM
To: [Donald McLeod](#)
Subject: Re: Corp #1959882

Good Afternoon Mr. McLeod, ,
Kindly provide me with a copy of the last Form 1 Notice of Change submitted to the Ministry.

Best regards,
Wendy Grant

From: Donald McLeod <don@bramptonfocus.ca>
Sent: August 7, 2019 3:14 PM
To: Grant, Wendy (MGCS) <Wendy.Grant@ontario.ca>
Subject: Corp #1959882

Wendy – Here is the last submitted form for the list of Directors that I send in – Fazal Khan is no longer a Director – And the only listed as Directors should be Donald Mcleod – Karla Bailey – Cassian Joseph – Michael Gyovai.

I had submitted another form back in 04/2017 that listed Hardeep Kalirah as no longer a Director, as well as submitting one later to remove Paul Vicente...

Can you adjust the records to show this.
Thank you

10.2-153

Don McLeod

Sent from Mail for Windows 10

10.2-154

**APPENDIX "24": Email Communication from Brampton Guardian Journalist to
Councillor Enclosing Copies of Brampton Focus' Group Text Messages**

10.2-155

How's things? I'm working on a follow-up to Brampton Focus potential conflict of interest with Coun. Vicente and Santos. We've obtained a significant amount of internal Brampton Focus communications between members of the board of directors involving Santos and Vicente in private group message chats well past their stated resignation date in December 2017. The last excerpt is from July 2017 while they were both still active directors. I've verified the authenticity of these communication and sent inquiries to both Coun. Vicente and Santos with questions, but haven't yet received a response.

As a veteran councillor, I'm hoping you to get your thoughts on the appropriateness of the following as it relates to the code of conduct. Would you have declared a pecuniary interest in this situation? (See excerpts below)

Thanks,
G.

Discussion on March 28, 2018 between Paul Vicente (Paul Brampton Focus, Rowena Santos) and Michael Gyovia :

9:30 a.m. : Wow now with wards 15 open in both seats, this election will be a huge game changer.....let's do what we need to do together and get Paul and Rowena elected.

9:32 a.m. : Faz of you can please get me the final copy of my videos today that would be great as I want to post and boost for Easter weekend. Also send invoice so I can get it paid sooner than later.

9:37 a.m. : ð ð _ _ _

9:40 a.m. : We need like minded people like you two in office that will focus on the needs of the people and businesses first, bringing together all Provincial and Federal parties for the best results Brampton needs. We need bridge builders.

9:47 a.m. : <https://standup4brampton.com/bramptoncouncillorelainemooreannouncesretirement/>

9:48 a.m. : I know u two know this but be careful on how you talk about the two retirements. Maybe there is a chance to still get their support and endorsements.

9:48 a.m. Paul Brampton Focus: Moore will be endorsing someone already.

9:49 a.m. : It would not hurt to find out one or two things they have been or would have championed and have that as part of your platform.

9:49 a.m. : Doe not mean paul u can't try. Use your magic..._

9:58 a.m. : I don't think Elaine endorsement is a good thing

9:58 a.m. : Necessarily

9:59 a.m. : But her 10k votes don't hurt....just saying

10:00 a.m. Paul Brampton Focus: I am 101 percent certain she will not endorse me. Rowena may have a shot. Perhaps a good one.

10:00 a.m. : Everyone loves u paul. We have to bring her back to the light....

Discussion on March 26, 2018 between Paul Brampton Focus, Fazal Khan, Rowena Santos), Michael Gyovia | and Karthika Gobinath

10.2-156

9:34 p.m. : Congrats again to you don and Fazal and Paul for such an awesome event launch yesterday! You shld be so proud of the good work you are doing! Honoured to know all of you! Thank you for your blood sweat and tears for the community!!!! _ _ _ (emojis)

9:43 p.m. : Great job Don Faz and Paul. Another professional job.

9:46 p.m. : Great work Rowena and Karthika on your passionate and personal messages. We need more women in our society with your courage, intelligence and determination to make a difference and to never give up fighting for what you believe in.

9:59 p.m. Thank you team _ I second that! 🙌

9:59 p.m. : Thanks Michael

10:04 p.m. Fazal Khan: (emoji)

10:22 p.m. Paul Brampton Focus: (emoji)

Excerpt from June 7, 2018. Discussion between Paul Vicente (Paul Brampton Focus), Michael Gyovia, Fazal Khan and Donald McLeod :

11:00 p.m. Paul Brampton Focus: Great job, tonight, Fazal and Don!! And Cassian!

11:01 p.m. : Ditto

11:20 p.m. Fazal Khan: (emoji)

8:38 a.m. : And Charbon

Excerpt from discussion on July 14-15, 2017 between Paul Vicente (Paul Brampton Focus), Michael Gyovia 6277), Rowena Santos and Donald McLeod :

9:28 p.m. : Michael, it has come to my attention that you intend to run for the NDP centre nomination, if you are, I would suggest that you would have to resign your position as a Director of Brampton Focus as it may be a conflict of interest as we as a media group must be impartial. Can you please clarify as to your intentions.

7:58 a.m. : I am considering running for the nomination. I am in the process of determining where and how I can get funds for the campaign. I am giving myself until the end of August. If I can come up with 30k at the time of the nomination then I will not be going for it.

8:09 a.m. I will be help campaign even if I don't run. So does that mean Paul will resign if he runs for the municipal election?

8:10 a.m. Or anyone else?

8:10 a.m. I will let u know as soon as I know. It will be hard to raise those funds so I need help.

8:21 a.m. That's too bad I guess Rowena will have to resign too since she works for Andrea.

8:27 a.m. : Yes, Paul or anyone else who is RUNNING would have to resign. Rowena works for Andrea, big difference.

8:28 a.m. 3: Ummm... everyone knew I worked for Andrea and the NDP before I came on board... I think Don may just be talking about people who are officially running for a party. I recall a meeting about this. Perhaps we need more clarity, Don?...

8:28 a.m.): If you want at the next meeting we can

8:28 a.m.): If you want at the next meeting we can put it to a vote, but this has been very clear since the beginning

9:42 a.m. Paul Brampton Focus: We have discussed before that when we run for office we have to step down. This is the same for other orgs. In my case, with Carabram, I have to resign that as well. I think if somebody is supporting a party day to day, there is nothing wrong with that. But if you become a declared candidate for something, then yes. The obvious problem is that the minute one of is is running, folks will say we are using BF for our advantage. This is another reason why we spoke about doing recorded statements this fall.

9:42 a.m. Paul Brampton Focus: Hope the above provides some background.

9:43 a.m. Paul Brampton Focus: Michael, are you running for the nomination?

9:47 a.m.): This does not mean you are out of BF, it just means that you are not a Director and able to vote and make decisions that could be construed as benefiting you or as an organization supporting you.

10.2-157

10:20 a.m. : I am just thinking from the point of all the hard work that has been done. For Paul for example that has put so much into.

10:21 a.m. Paul Brampton Focus: We built a media machine. It's tiny. But it has a name. What do I "expect" in return?
Balanced coverage of elections. Nothing more.

10.2-158

**APPENDIX "25": Email from Councillor Vicente to Integrity and Ethics
Commissioner dated October 21, 2019**

Saba J. Khan

From: Vicente, Paul - Councillor <Paul.Vicente@brampton.ca>
Sent: Monday, October 21, 2019 4:08 PM
To: Saba J. Khan
Cc: Muneeza Sheikh
Subject: RE: Bruce Marshall Complaint Investigation - document request
Attachments: Brampton Focus Correspondence.pdf; Discussion (Brampton Guardian) Record.pdf

Thank you for your inquiry, Ms. Khan.

I have attached a PDF with all correspondence between myself and Brampton Focus and Neighbourhood Watch. There are two main instances; once I received an invite to film a promo for the City's Canada Day festivities, and the other was an exchange, of which you already have a part copy, related to my status as a (resigned) Director. In addition to these, Brampton Focus sent to all Members of Council, including myself, updates on their work. These are included for your review as well.

With respect to meetings, I have had no meetings with any members of Brampton Focus and Neighbourhood Watch. I do, on occasion, see Fazal Khan, Don McLeod, and sometimes, other past and present Directors of Brampton Focus at community events where we simply say hello to each other and no other substantive discussion occurred. The Community Safety Advisory Committee has a representative from Neighbourhood Watch in attendance, and those discussions are a matter of public record. Following the May 8th decision in regards to Brampton Focus and Neighbourhood Watch, I did have a brief discussion with Councillor Santos and Jason Tamming, the Director of Communications for the City of Brampton, as he dropped by our office to seek clarification regarding the motion. At that time, I re-iterated my view (as I had expressed during Council) that a neighbourhood watch pilot is a worthwhile effort. Other than that, no other meetings on the issue of Brampton Focus and Neighbourhood Watch were held at any other time.

With respect to text messages between myself and the Directors of Brampton Focus regarding my role in their organization, I had received an inquiry from a journalist which contains portions of group chat conversations that happened in Spring 2018, prior to the municipal election. In those exchanges, we talk about how one cannot be a Director if running for office. I have no further records because I was removed from those group discussions and do not have access to them and did not retain copies. The segments provided to me by the media are included in an attached PDF.

As for my house, owned by me and my wife, Brampton Focus and Neighbourhood Watch never "operated" from that house. I built a small television studio upstairs wherein I volunteered my time and resources to Brampton Focus' broadcasting efforts; they were my guests at the house when we did recordings or broadcasts, and I received no remuneration from Brampton Focus at any time. I never provided Brampton Focus with a key to the house. Since the day I became a Regional Councillor, the house has not been used by anyone except myself and members of my family.

Regards,

Paul Vicente
Regional Councillor Wards 1 & 5
905-874-2601

10.2-160

APPENDIX "26": Memorandum from Suzanne Craig dated March 21, 2019

10.2-161

Office of the Integrity Commissioner and Lobbyist Registrar
City of Brampton

memorandum

DATE: Thursday March 21, 2019
TO: Regional and Local Councillor Paul Vicente
FROM: Suzanne Craig – Integrity Commissioner and Lobbyist Registrar
RE: Request for Formal Opinion

3. Decisions related to organizations with which you previously served as a volunteer through their boards; specifically, CaraBram (cultural festival) and Brampton Focus (community media and neighbourhood watch program). You no longer serve in any capacity with these organizations.

10.2-162

Office of the Integrity Commissioner and Lobbyist Registrar
City of Brampton

10.2-163

Office of the Integrity Commissioner and Lobbyist Registrar
City of Brampton

10.2-164

Office of the Integrity Commissioner and Lobbyist Registrar
City of Brampton

4. Your circumstances

At common law, a decision-maker may have a personal interest where they have an important pecuniary or non-pecuniary interest in the *subject-matter* at hand.⁶ As I understand the facts, as a Member of Council, you yourself do not have any pecuniary interest in any future meeting of Council that discusses Brampton council's consideration of:

- Decisions related to organizations that you previously served as a volunteer through their boards; specifically, CaraBram (cultural festival) and Brampton Focus (community media and neighbourhood watch program). You no longer serve in any capacity with these organizations.⁷

⁶ Brown and Evans, *Judicial Review of Administrative Decisions in Canada* (loose-leaf) at paragraph 11:2000ff

⁷ However, given your past relationship with these organizations, should either come before Council or Committee seeking grant approval or some type of approval, you may consider providing a due diligence statement which will indicate that you had been a Member but that since being elected to public office you have not participated in any way in the administration or decision-making of those organizations.

10.2-165

Office of the Integrity Commissioner and Lobbyist Registrar
City of Brampton

10.2-166

Office of the Integrity Commissioner and Lobbyist Registrar
City of Brampton

10.2-167

Office of the Integrity Commissioner and Lobbyist Registrar
City of Brampton

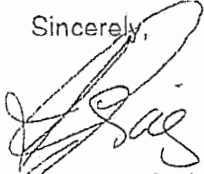
In my view, based on the information that you have provided to me, you do not have a pecuniary interest pursuant to section 5(1) of the MCIA in the matters set out on page 1 of this opinion, except for #7 and #8 for which you will likely have a pecuniary interest not in common with electors generally. If an application was brought under the MCIA against you, a court could receive evidence to indicate that the property where one or both of your houses is located could be worth several thousand dollars less or more as a result of the decision of council to change the use of an area in close proximity to your homes. In similar cases, the courts have found that the fact that the value of the property of other nearby property owners would also be increased or reduced did not afford the elected official a community of interest sufficient to relieve him from complying with the Act.¹⁷ In other words, in a live court case, evidence brought by an applicant could be compelling in sufficient measure to convince a judge that a pecuniary interest is real and defined.

¹⁷ *Sheehan v. Harte*, [1993 CarswellOnt 524 (Ont. Gen. Div.)]

10.2-168

Office of the Integrity Commissioner and Lobbyist Registrar
City of Brampton

Sincerely,

A handwritten signature in black ink, appearing to read 'Suzanne Craig', written in a cursive style.

Suzanne Craig
Integrity Commissioner and Lobbyist Registrar

10.2-169

APPENDIX "24": Councillor Santos' Resignation Email to Brampton Focus (dated December 22, 2017)

----- Forwarded message -----

From: Rowena Santos <santos.rowena@gmail.com>

Date: Fri, Dec 22, 2017 at 7:13 AM

Subject: Thank you

To: Brampton Focus - All Dir. <directors@bramptonfocus.ca>

Dear Brampton Focus Team,

As 2017 comes to a close I wanted to confirm that I am stepping down from the board of Brampton Focus as of today, December 22nd. Thank you for the opportunity to serve as a fellow Director of the Brampton Focus team. It has been a privilege to contribute to such an important grass roots media organization like Brampton Focus which has community at its core. I have learned so much and enjoyed working with all of you.

Thank you again for the opportunity and I wish the entire Brampton Focus team all the very best in 2018!

Sincerely,
Rowena Santos

10.2-171

APPENDIX "28": Slide Deck Used by Brampton Focus During Delegation at City Council Meeting on May 8, 2019

10.2-172

Re: 17.2



NEIGHBOURHOOD WATCH BRAMPTON

NWBrampton.ca

JOIN NOW (FR

BACKGROUND



NEIGH
WATC

- **Canada's Safest City – Are you in?**
- **Launched January 2017**
- **3,500+ registered homes**
- **50+ Watch Groups (active/dormant)**
- **Developed / Funded / Managed by
Brampton Focus Community Media**

10.2-174

WHAT WE DO



NEIGH
WATC

- **Neighbourhood 'Social' Development and Capacity Building**
Organize / Support / Sustain
- **Crime Prevention Education (Property)**
In partnership with Peel Police
- **Communication**
Web / Social / Video / Newspaper
- **'Social Crisis' Response**
Townhalls / Crowdfunding

OPPORTUNITY



NEIGH
WATCH

- **Engage All Residents / All Year Round**
Support building / townhouse groups
- **Extend impact to violent and cyber crime**
Promote existing programs and social services groups
- **Increase Civic Pride**
Keep residents informed about their city with high quality
engaging content

SUSTAIN & BUILD



NEIGH
WATC

- **Year round pro-active program delivery**
- **Dedicated resourcing**
- **Language tailored social videos / resources**
- **City / Regional / Police / Provincial / Federal**
All levels of government responsibility – starts with th
- **Neighbourhood Initiatives Community Grant**
Excellent program. More flexibility needed.
- **Vision 2040 Neighbourhood Audits**
Outstanding program that can engage many more resi

10.2-177



**NEIGHBOURHOOD
WATCH BRAMPTON**

10.2-178

BRAMPTON NFOCUS

BACKGROUND

BRAMPTON

A dynamic non-profit volunteer group advancing the economic, civic, social, cultural and safety concerns of Brampton residents through community engagement, media coverage and live events.

10.2-180

SPECIALIZATION

BRAMPTON

Maximizing the use of online and streaming video as an effective tool for residents and community groups to communicate and engage with each other

10.2-181

ACCOMPLISHMENTS

BRAMPTON

- Produced the city's first all-candidates debate for the 2015 federal election
- Provided 100+ hours of broadcast quality programming for Rogers Cable 10
- Recorded and managed media rights to the Jagmeet & Greet video (125+ million views)
- Received the BBOT 2017 Communications Award

ACCOMPLISHMENTS

BRAMPTON

- **Live streamed the Brampton Santa Claus Parade for the past 3 years**
- **Live streamed over 50 interviews, townhalls and community events**
- **Organized and broadcast the largest Mayoral debate in our city's history**
- **Created 350+ social community videos in the past year**

10.2-183

PROGRAMS

BRAMPTON 

Brampton Focus (Social Video)

All encompassing coverage

Neighbourhood Watch Brampton

Community Safety – nwbrampton.ca

Harmonize (Provincial Partnership)

Diversity & Inclusion Hub – harmonize.ca

Brampton Voters

Civic Engagement – bramptonvoters.ca

10.2-184

UPCOMING

BRAMPTON

Seniors Townhall Series (Federal Partnership)

Seniors run program – 7 townhalls this year

Small Business Hub

Promoting Small/Mid sized businesses

Summer Students (Federal Partnership)

Providing paid internships for up to 25 students

10.2-185

OPPORTUNITIES TO ADVANCE BRAMPTON


BRAMPTON  NFOCUS

10.2-186

BRAMPTON FOCUS

10.2-187

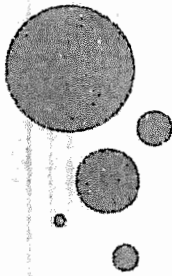
**APPENDIX "29": Presentation by Brampton Safe City Association from 2015
Referencing the Neighborhood Watch Program**



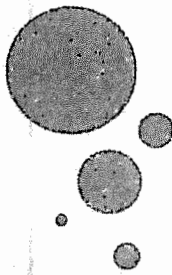
*Brampton
Safe City*

www.bramptonsafecity.ca

BRAMPTON SAFE CITY ASSOCIATION
Presentation to City Council
March, 2015



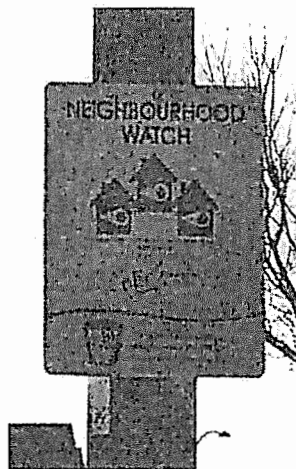
PROGRAMS:



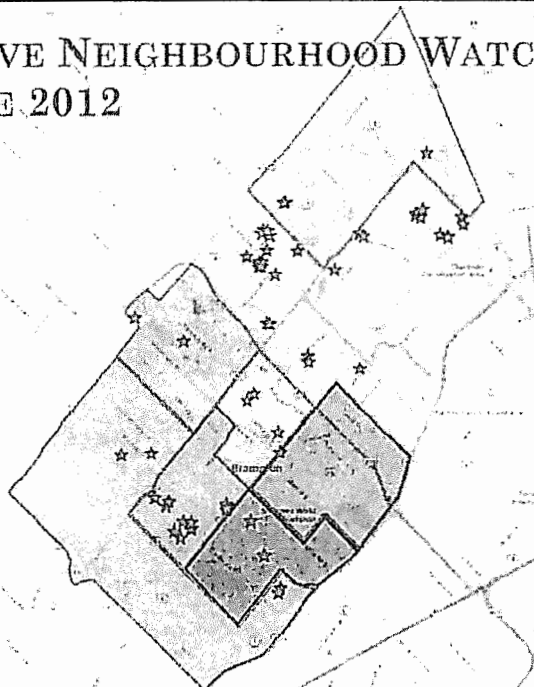
Neighbourhood Safety
Youth Safety
Road Safety

NEIGHBOURHOOD WATCH

A community-based crime prevention program aimed at reducing crime in Brampton's residential neighbourhoods.

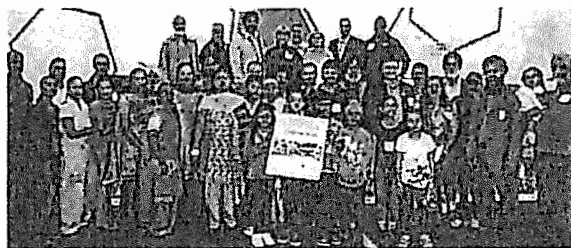


ACTIVE NEIGHBOURHOOD WATCHES SINCE 2012



GOOD NEIGHBOURS/GREAT NEIGHBOURHOODS

A program to support and engage citizens in making their neighbourhoods safe, friendly, clean and caring places.



22 Neighbourhoods designated since 2011



GREAT NEIGHBOURHOODS

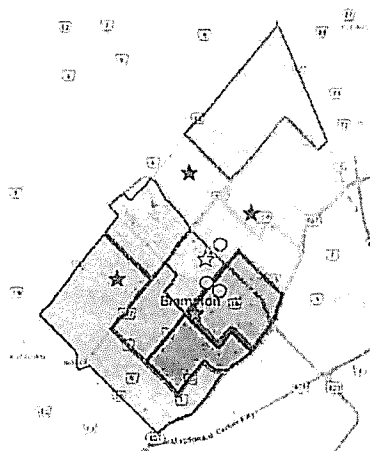


NEIGHBOURHOOD SAFETY TEAMS

Teams of citizens working together with community agencies in Brampton neighbourhoods where higher-than-normal challenges in crime, poverty, youth violence or other negative issues are happening.

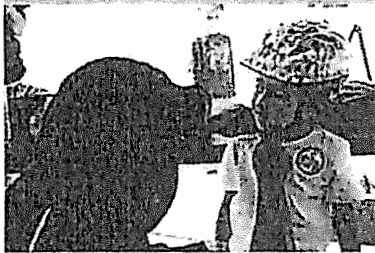


SPECIAL NEIGHBOURHOOD SAFETY TEAMS



- Brampton Springdale Network
- Bramalea Community Network
- Brampton Northwest Connects
- Knightsbridge Kingscross Team
- Queen Kennedy Neighbourhood Team
 - Beech Street
 - Community in Action
 - The Journey
- Fair Oaks/McHardy Court

COMMUNITY EVENTS



- o Bike to Work Day
- o Love Brampton
- o Cele-Brampton
- o Bike the Creek
- o Sundridge Street Party
- o Community Collaborators
- o Classic Cars & Legendary Stars
- o Brampton A's 3 on 3
- o Wilmont Court BBQ
- o Homestead P.S. Rodeo Night
- o Porchlight Street Party
- o Howden's 40th Celebration
- o Lucas Holtom Carnival
- o Greenbriar Safety Day
- o Snelgrove Community BBQ
- o Road Today Truck Show

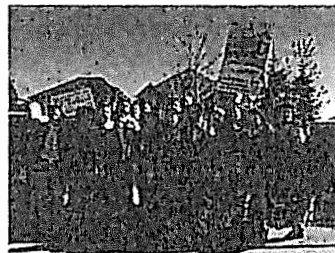
YOUTH PROGRAMS

o Safety Education Workshops:

- Appreciating Diversity
- Healthy vs. Unhealthy Relationships
- Cyber Safety
- Personal Safety/Bullying
- Youth Gambling
- Substance Awareness
- Banking and Fraud
- Stress and Coping Skills
- Conflict Resolution
- CPR

12,000+ Brampton youth have received safety training since 2002

From 2011 to 2013 Brampton youth contributed a total of **13,062** volunteer hours through Brampton Safe City towards safety projects in their schools and communities

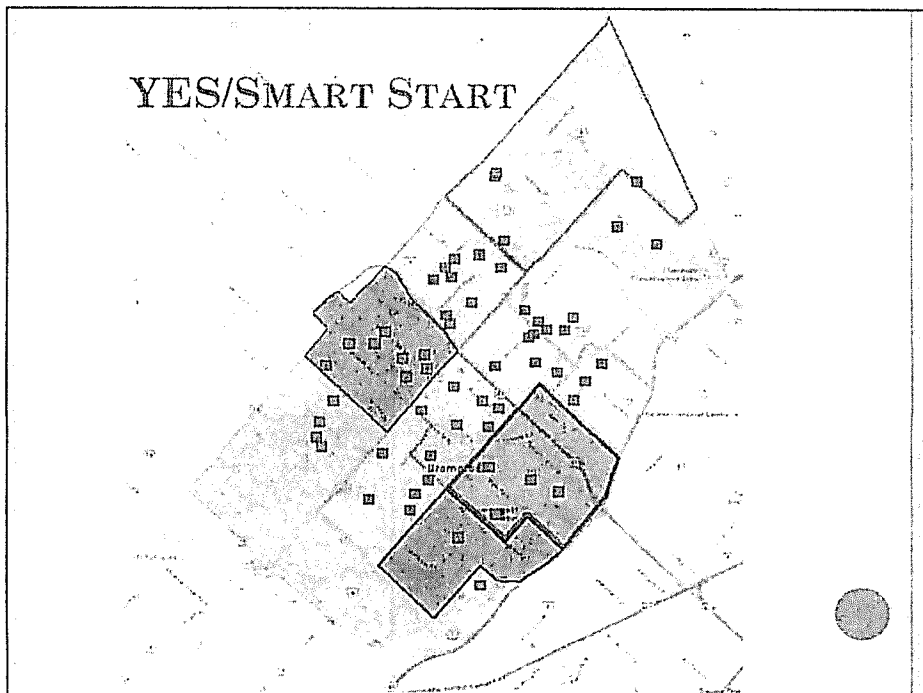


YOUTH PROGRAMS – YES & SMART START

- o Archbishop Romero S.S.
- o Balmoral Public School
- o Beatty-Fleming S.P.S.
- o Bishop Francis Allen
- o Bramalea Secondary School
- o Brampton Centennial S.S.
- o Calderstone Middle School
- o Cardinal Ambrozic S.S.
- o Cardinal Leger S.S.
- o Cardinal Newman
- o Central Peel S.S.
- o Chinguacousy S.S.
- o David Suzuki S.S.
- o Father CW Sullivan
- o Fletcher's Meadow S.S.
- o Good Shepherd
- o Gordon Graydon
- o Harold M. Braithwaite S.S.
- o Heart Lake Secondary
- o Holy Name of Mary S.S.
- o Judith Nyman S.S.
- o Lester B Pearson
- o Lougheed Middle School
- o Louise Arbour S.S.
- o McCrimmon Middle School
- o Michael J. McGivney
- o Mount Royal Public School
- o North Park Secondary
- o Notre Dame Secondary
- o Our Lady of Fatima
- o Our Lady of Lourdes
- o Our Lady of Peace
- o Our Lady of Providence
- o Peel Alternative School North
- o Roberta Bondar
- o Sacred Heart
- o Sandalwood Heights S.S.
- o Sir John A. Macdonald
- o Somerset Drive P.S.
- o St. Agnes
- o St. Andre Bessette
- o St. Augustine S.S.
- o St. Cecilia
- o St. Edmund Campion S.S.
- o St. Isaac Jogues
- o St. Jean Brebeuf
- o St. Joachim
- o St. John Bosco
- o St. Josephine Bakhita
- o St. Leonard
- o St. Lucy
- o St. Marguerite d'Youville S.S.
- o St. Mary
- o St. Roch S.S.
- o St. Stephen
- o St. Thomas Aquinas S.S.
- o St. Ursula
- o Sunny View Middle School
- o Turner Fenton S.S.
- o Williams Parkway Senior Public School

Total Brampton Schools: 60

YES/SMART START



YOUTH SAFETY PROJECTS

St. Mary



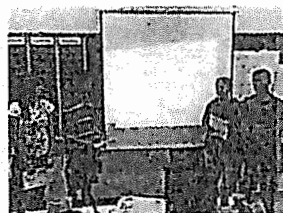
Two groups of grade 7 students worked to raise awareness about traffic safety in their community.

St. Stephen



R.E.D. Team & H.O.P.E. Team worked to create anti-bullying campaigns in their school.

Roberta Bondar



A group of grade 8 students met before school to combat homophobia and promote inclusion

UNITED WAY-FUNDED YOUTH PROJECTS

The Human Billboard Project



An anti-violence campaign created by Brampton youth

J.E.T. Mentors



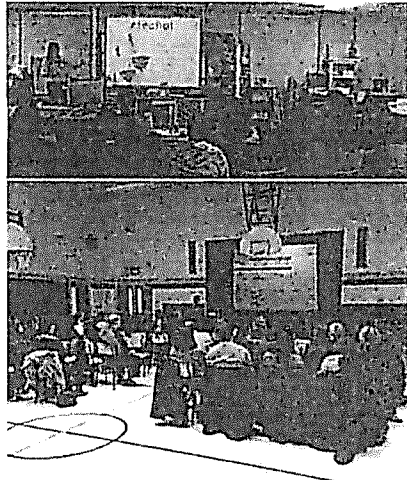
A free basketball drop-in program in wards 9&10 and 2&6 for youth

YIOTC



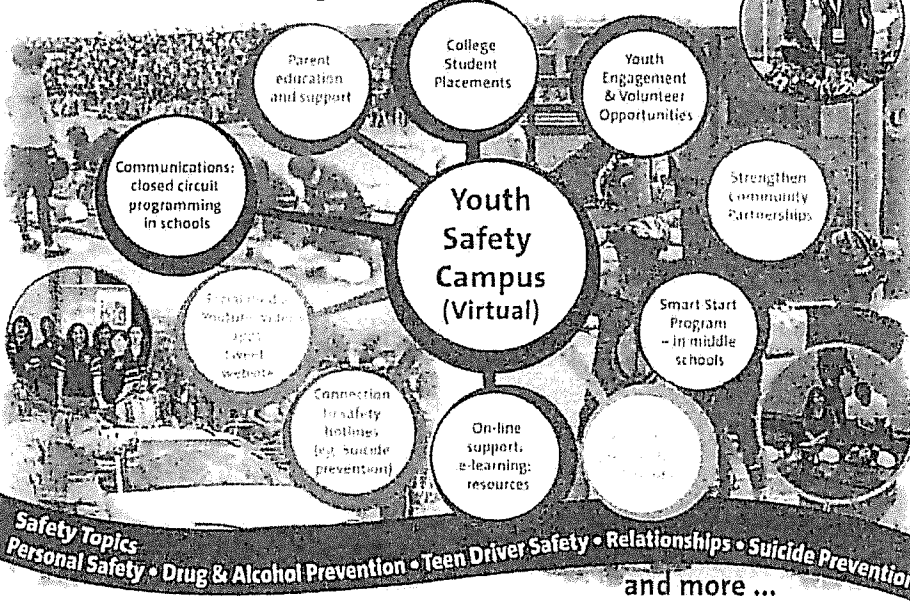
Students from Chinguacousy S.S. organize skate camp and safety workshops for neighbourhood youth

EMPOWERING PARENTS



Empowering Parents is a free initiative designed to provide parents with current information to help them assist their children in making positive, healthy life choices in their future

Youth Safety Plan for Brampton



10.2-196

APPENDIX “30”: Informal Complaint by Mr. Khan dated February 27, 2018

10.2-197

From: Fazal Khan <fazal@bramptonfocus.ca>
Sent: 2018/02/27 11:50 AM
To: Mayor Jeffrey; Palleschi, Michael - Councillor; Whillans, Doug - Councillor; Moore, Elaine - Councillor; Gibson, Grant - Councillor; Medeiros, Martin - Councillor; Bowman, Jeff - Councillor; Sprovieri, John Councillor; Dhillon, Gurpreet - Councillor; Miles, Gael - Councillor; Fortini, Pat - Councillor
Cc: Fay, Peter; Schlange, Harry; don Mcleod
Subject: Code of Conduct Complaint
Attachments: NWBrampton_signage_022718.pdf

Good Morning Councillors,

I am following the Informal Complaint Procedure of the Council Code of Conduct Complaint Protocol to find a resolution to a concern of bias by Brampton's Safety Advisory Committee against Neighbourhood Watch Brampton.

To address our concerns, I am requested that the Brampton Safety Advisory Committee relieve itself from the signage request consideration that I delegated to Committee of Council in January 2017.

I have copied the City Clerk with an expectation that this matter be addressed at the Brampton Safety Advisory Committee this evening.

Details attached.

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APPENDIX “3 |”: Relevant Sections of *Municipal Act, 2001*

Section 23.1

General power to delegate

23.1 (1) Without limiting sections 9, 10 and 11, those sections authorize a municipality to delegate its powers and duties under this or any other Act to a person or body subject to the restrictions set out in this Part. 2006, c. 32, Sched. A, s. 15.

Section 23.2

Restriction re delegation of legislative and quasi-judicial powers

23.2 (1) Sections 9, 10 and 11 do not authorize a municipality to delegate legislative and quasi-judicial powers under any Act except those listed in subsection (2) and the legislative and quasi-judicial powers under the listed Acts may be delegated only to,

- (a) one or more members of its council or a council committee;
- (b) a body having at least two members of whom at least 50 per cent are,
 - (i) members of its council,
 - (ii) individuals appointed by its council,
 - (iii) a combination of individuals described in subclauses (i) and (ii); or
- (c) an individual who is an officer, employee or agent of the municipality. 2006, c. 32, Sched. A, s. 15.

Section 223.3

Integrity Commissioner

223.3 (1) Without limiting sections 9, 10 and 11, those sections authorize the municipality to appoint an Integrity Commissioner who reports to council and who is responsible for performing in an independent manner the functions assigned by the municipality with respect to any or all of the following:

1. The application of the code of conduct for members of council and the code of conduct for members of local boards.
2. The application of any procedures, rules and policies of the municipality and local boards governing the ethical behaviour of members of council and of local boards.
3. The application of sections 5, 5.1 and 5.2 of the *Municipal Conflict of Interest Act* to members of council and of local boards.

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4. Requests from members of council and of local boards for advice respecting their obligations under the code of conduct applicable to the member.
5. Requests from members of council and of local boards for advice respecting their obligations under a procedure, rule or policy of the municipality or of the local board, as the case may be, governing the ethical behaviour of members.
6. Requests from members of council and of local boards for advice respecting their obligations under the *Municipal Conflict of Interest Act*.
7. The provision of educational information to members of council, members of local boards, the municipality and the public about the municipality's codes of conduct for members of council and members of local boards and about the *Municipal Conflict of Interest Act*. 2017, c. 10, Sched. 1, s. 19 (1).

Provision for functions if no Commissioner appointed

(1.1) If a municipality has not appointed a Commissioner under subsection (1), the municipality shall make arrangements for all of the responsibilities set out in that subsection to be provided by a Commissioner of another municipality. 2017, c. 10, Sched. 1, s. 19 (2).

Provision for functions if responsibility not assigned

(1.2) If a municipality has appointed a Commissioner under subsection (1), but has not assigned functions to the Commissioner with respect to one or more of the responsibilities set out in that subsection, the municipality shall make arrangements for those responsibilities to be provided by a Commissioner of another municipality. 2017, c. 10, Sched. 1, s. 19 (2).

Powers and duties

(2) Subject to this Part, in carrying out the responsibilities described in subsection (1), the Commissioner may exercise such powers and shall perform such duties as may be assigned to him or her by the municipality. 2006, c. 32, Sched. A, s. 98.

Request for advice shall be in writing

(2.1) A request by a member of council or of a local board for advice from the Commissioner under paragraph 4, 5 or 6 of subsection (1) shall be made in writing. 2017, c. 10, Sched. 1, s. 19 (3).

Advice shall be in writing

(2.2) If the Commissioner provides advice to a member of council or of a local board under paragraph 4, 5 or 6 of subsection (1), the advice shall be in writing. 2017, c. 10, Sched. 1, s. 19 (3).

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Content of educational information

(2.3) If the Commissioner provides educational information to the public under paragraph 7 of subsection (1), the Commissioner may summarize advice he or she has provided but shall not disclose confidential information that could identify a person concerned. 2017, c. 10, Sched. 1, s. 19 (3).

Delegation

(3) The Commissioner may delegate in writing to any person, other than a member of council, any of the Commissioner's powers and duties under this Part. 2006, c. 32, Sched. A, s. 98.

Same

(4) The Commissioner may continue to exercise the delegated powers and duties, despite the delegation. 2006, c. 32, Sched. A, s. 98.

Status

(5) The Commissioner is not required to be a municipal employee. 2006, c. 32, Sched. A, s. 98.

Indemnity

(6) A municipality shall indemnify and save harmless the Commissioner or any person acting under the instructions of that officer for costs reasonably incurred by either of them in connection with the defence of a proceeding if the proceeding relates to an act done in good faith in the performance or intended performance of a duty or authority under this Part or a by-law passed under it or an alleged neglect or default in the performance in good faith of the duty or authority. 2017, c. 10, Sched. 1, s. 19 (4).

Interpretation

(7) For greater certainty, nothing in this section affects the application of section 448 with respect to a proceeding referred to in subsection (6) of this section. 2017, c. 10, Sched. 1, s. 19 (4).

Section 223.9

Registry

223.9 (1) Without limiting sections 9, 10 and 11, those sections authorize the municipality to establish and maintain a registry in which shall be kept such returns as may be required

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by the municipality that are filed by persons who lobby public office holders. 2006, c. 32, Sched. A, s. 98.

Requirement to file returns, etc.

(2) Without limiting sections 9, 10 and 11, those sections authorize the municipality to provide for a system of registration of persons who lobby public office holders and to do the following things:

1. Define "lobby".
2. Require persons who lobby public office holders to file returns and give information to the municipality.
3. Specify the returns to be filed and the information to be given to the municipality by persons who lobby public office holders and specify the time within which the returns must be filed and the information provided.
4. Exempt persons from the requirement to file returns and provide information.
5. Specify activities with respect to which the requirement to file returns and provide information does not apply.
6. Establish a code of conduct for persons who lobby public office holders.
7. Prohibit former public office holders from lobbying current public office holders for the period of time specified in the by-law.
8. Prohibit a person from lobbying public office holders without being registered.
9. Impose conditions for registration, continued registration or a renewal of registration.
10. Refuse to register a person, and suspend or revoke a registration.
11. Prohibit persons who lobby public office holders from receiving payment that is in whole or in part contingent on the successful outcome of any lobbying activities. 2006, c. 32, Sched. A, s. 98.

Access to registry

(3) The registry described in subsection (1) shall be available for public inspection in the manner and during the time that the municipality may determine. 2006, c. 32, Sched. A, s. 98.

Section 223.11

Registrar for lobbying matters

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223.11 (1) Without limiting sections 9, 10 and 11, those sections authorize the municipality to appoint a registrar who is responsible for performing in an independent manner the functions assigned by the municipality with respect to the registry described in subsection 223.9 (1) and the system of registration and other matters described in subsection 223.9 (2). 2006, c. 32, Sched. A, s. 98.

Powers and duties

(2) Subject to this Part, in carrying out these responsibilities, the registrar may exercise such powers and shall perform such duties as may be assigned to him or her by the municipality. 2006, c. 32, Sched. A, s. 98.

Delegation

(3) The registrar may delegate in writing to any person, other than a member of council, any of the registrar's powers and duties under this Part. 2006, c. 32, Sched. A, s. 98.

Same

(4) The registrar may continue to exercise the delegated powers and duties, despite the delegation. 2006, c. 32, Sched. A, s. 98.

Status

(5) The registrar is not required to be a municipal employee. 2006, c. 32, Sched. A, s. 98.

Section Amendments with date in force (d/m/y)

Section 223.12

Inquiry by registrar

223.12 (1) This section applies if the registrar conducts an inquiry under this Part in respect of a request made by council, a member of council or a member of the public about compliance with the system of registration described in subsection 223.9 (2) or with a code of conduct established under that subsection. 2006, c. 32, Sched. A, s. 98.

Inquiry

(2) The registrar may elect to exercise the powers under sections 33 and 34 of the *Public Inquiries Act, 2009*, in which case those sections apply to the inquiry. 2009, c. 33, Sched. 6, s. 72 (2).

Duty of confidentiality

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(3) Section 223.5 applies, with necessary modifications, with respect to the registrar and every person acting under the instructions of the registrar in the course of conducting an inquiry. 2006, c. 32, Sched. A, s. 98.

Report

(4) If the registrar makes a report to a municipality in respect of an inquiry, the registrar may disclose in the report such matters as in the registrar's opinion are necessary for the purposes of the report. 2006, c. 32, Sched. A, s. 98.

Publication of reports

(5) The municipality shall ensure that reports received from the registrar are made available to the public. 2006, c. 32, Sched. A, s. 98.

Testimony

(6) Neither the registrar nor any person acting under the instructions of the registrar is a competent or compellable witness in a civil proceeding in connection with anything done when conducting an inquiry. 2006, c. 32, Sched. A, s. 98.

Reference to appropriate authorities

(7) If the registrar, when conducting an inquiry, determines that there are reasonable grounds to believe that there has been a contravention of any other Act or of the *Criminal Code* (Canada), the registrar shall immediately refer the matter to the appropriate authorities and suspend the inquiry until any resulting police investigation and charge have been finally disposed of, and shall report the suspension to council. 2006, c. 32, Sched. A, s. 98.

10.2-204

APPENDIX "32": Lobbyist Registry By-law



THE CORPORATION OF THE CITY OF BRAMPTON

BY-LAW

Number 149-2015

A By-law to establish and maintain a Lobbyist Registry in the City of Brampton

RECITALS

City Council has determined that it is desirable to establish and maintain a Lobbyist Registry to provide transparency and oversight with regards to persons who lobby the City of Brampton's public office holders, both elected and non-elected.

Sections 8, 9, and 11 of the *Municipal Act, 2001* authorize Council to pass by-laws necessary or desirable for municipal purposes, and in particular paragraph 2 of subsection 11(2) authorizes by-laws respecting the accountability and transparency of the municipality and its operations.

Section 223.9 of the *Municipal Act, 2001* permits the City of Brampton to establish and maintain a Lobbyist Registry in which shall be kept registrations and returns filed by persons who lobby the City of Brampton's public office holders, both elected and non-elected.

Section 223.11 of the *Municipal Act, 2001* permits the City of Brampton to appoint a Lobbyist Registrar who is responsible for performing in an independent manner the functions assigned by the City of Brampton with respect to the Lobbyist Registry.

Sections 23.1 and 23.2 of the *Municipal Act, 2001* permits the City of Brampton to delegate its powers and duties, including legislative and quasi-judicial powers under the *Municipal Act, 2001*, to an individual who is an officer, employee or agent of the City of Brampton.

The Council of the Corporation of the City of Brampton ENACTS AS FOLLOWS:

PART I – TITLE, SCOPE AND INTERPRETATION

1. Lobbyist Registry By-law 149-2015 may be referred to as the "Lobbyist Registry By-law".
2. The Lobbyist Registry By-law applies to all public office holders in the City of Brampton, subject to the exemptions noted in Part IV of the Lobbyist Registry By-law.

3. The Lobbyist Registry By-law applies to all lobbying activities in the City of Brampton, subject to the exemptions noted in Part IV of the Lobbyist Registry By-law.
4. For the purposes of the Lobbyist Registry By-law:
 - (a) Words defined in Part II of the Lobbyist Registry By-law shall be interpreted as having a corresponding meaning if used as a noun, verb, adverb or adjective.
 - (b) References to items in the plural include the singular, as the context requires.

PART II – DEFINITIONS

5. For the purposes of the Lobbyist Registry By-law:
 - (a) “**business day**” means a day when the offices of the City of Brampton are open during its regular hours of business.
 - (b) “**City**” means the Corporation of the City of Brampton.
 - (c) “**Code of Conduct**” means the Lobbyist Code of Conduct, attached as Schedule “A” to the Lobbyist Registry By-law.
 - (d) “**communication**” means any form of expressive contact, including but not limited to a meeting, email, or other electronic messaging, facsimile transmission, letter, phone call, or other meaningful dialogue that falls within the definition of lobbying in either a formal or informal setting.
 - (e) “**constituent**” means,
 - i. An individual who resides in the City; or
 - ii. An owner or operator of a business or other organization located in the City.
 - (f) “**legislative action**” means all actions by Council or through its authority, including, but not limited to the:
 - i. development, introduction, passage, defeat, amendment or repeal of a by-law, motion or resolution;
 - ii. development, approval, amendment, application or termination of a City policy, program, directive, grant or guideline;
 - iii. outcome of a decision on any matter before Council, a Committee of Council or a Ward Councillor or staff member acting under delegated authority; or
 - iv. the purchase of goods, services or construction and the award of a contract by the City.
 - (g) “**lobby**” means any communication with a public office holder by an individual who represents a business or financial interest with the goal of trying to influence any legislative action.
 - (h) “**lobbyist**” means,
 - i. **consultant lobbyist** – an individual who lobbies for payment on behalf of a client (another individual, company, partnership or organization). If the consultant arranges for

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a meeting between a public office holder and a third party, this is considered lobbying.

- ii. **in-house lobbyist** – an individual who is an employee, partner, or sole proprietor, or a member of a board of directors and who lobbies on behalf of their own employer, business or organization.
 - iii. **voluntary unpaid lobbyist** – an individual who lobbies without payment on behalf of an individual, business, or other organization for the benefit of the interests of the individual, business or other organization.
- (l) **"Lobbyist Registry"** means a system of registration in which shall be kept registrations of persons who lobby public office holders and which shall include such information as determined by the Lobbyist Registrar.
- (j) **"local board"** has the same meaning as the definition of a local board in section 223.1 of the *Municipal Act, 2001*.
- (k) **"public office holder"** means,
- i. A Member of Council and any person on his or her staff;
 - ii. An officer or employee of the City;
 - iii. A Member of a local board or committee established by Council and any person on his or her staff; and
 - iv. An accountability officer appointed under the *Municipal Act, 2001*, including but not limited to: Auditor General, Integrity Commissioner, Lobbyist Registrar, Ombudsman, and Closed Meeting Investigator.
- (l) **"Lobbyist Registrar"** means the person appointed as Lobbyist Registrar under section 223.11 of the *Municipal Act, 2001*.

PART III – PROHIBITIONS

6. No person, on whose behalf another person undertakes lobbying activities, shall make payment for the lobbying activities that is in whole or in part contingent upon the successful outcome of any lobbying activities.
7. No lobbyist shall lobby on behalf of his or her client where the payment to the lobbyist is in whole or part contingent on the successful outcome of any lobbying activities.
8. No former public office holder shall engage in lobbying activities for a period of twelve (12) months after ceasing to be a public office holder at the City.
9. No lobbyist shall communicate with a public office holder in relation to a procurement where it is not permitted by the City's Purchasing By-law 35-2012, as amended, or successor by-law, procurement policies or procurement documents.
10. No lobbyist shall undertake in lobbying activities where the Lobbyist Registrar has prohibited them from doing so pursuant to Part VII of the Lobbyist Registry By-law.

PART IV – EXEMPTIONS

11. The Lobbyist Registry By-law does not apply to the following persons or bodies acting in their professional capacity:
- (a) Government or public sector, other than the City:
 - i. Members of the Senate, House of Commons, legislative assemblies of provincial/territorial governments, persons on the staff of the members;
 - ii. Members of a First Nations Council as defined in the Indian Act or council of an Indian band established by an Act of the Parliament of Canada, or persons on the staff of the members;
 - iii. Employees or consultants retained by the Government of Canada, the government of a province or territory, a First Nations or Indian band Council, federal or provincial crown corporation or other federal or other provincial public agency;
 - iv. Members of a council or other statutory body, including a local board, charged with the administration of the civil or municipal affairs of a municipality in Canada other than the City, persons on staff of the members, or officers or employees of the municipality or local board; and
 - v. Members of a national or sub-national foreign government, persons on the staff of the members, or officers, employees, diplomatic agents, consular officers or official representatives in Canada of the government.
 - (b) Officials and employees of the City, the Cities of Mississauga and Caledon, the Region of Peel and other municipal bodies:
 - i. Public office holders;
 - ii. Officers, directors, employees of a local board of the City and acting in their public capacity;
 - iii. Members of an Advisory Committee, acting in their public capacity and appointed by City Council.
 - (c) Members, directors, officers, employees or consultants retained by the following publicly-funded school boards and educational institutions:
 - i. Peel District School Board;
 - ii. Dufferin-Peel Catholic District School Board;
 - iii. Ontario French Public School Board;
 - iv. Ontario French Catholic School Board; and
 - v. Universities, colleges, and other publicly-funded educational institutions.
 - (d) Members, directors, officers, employees or consultants retained by the following publicly-funded healthcare institutions:
 - i. Brampton Civic Hospital; and
 - ii. Peel Memorial Centre for Integrated Health and Wellness

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- (e) Members, directors, officers, employees or consultants retained by the following municipal associations:
 - i. Association of Municipalities of Ontario; and
 - ii. Federation of Canadian Municipalities.
12. The Lobbyist Registry By-law does not apply to the following activities:
- (a) Communication that is a matter of public record or occurs during a meeting of Council, a Local Board or Committee of Council;
 - (b) Communication that occurs during a public process such as a public meeting, hearing, consultation, open house or media event held or sponsored by the City or a public office holder or related to an application;
 - (c) Communication restricted to a request for information;
 - (d) Communication restricted to compliments or complaints about a service or program;
 - (e) Communication with a public office holder by an individual on behalf of an individual, business or other organization regarding:
 - i. The enforcement, interpretation or application of any Act or by-law by the public office holder and with respect to the individual, business or organization;
 - ii. The implementation or administration of any policy, program, directive or guideline by the public office holder and with respect to the individual, business or organization;
 - iii. A personal matter of the individual, business or organization, unless it is communication that is in respect of a matter that falls under the definition of lobbying, that is for the special benefit of the individual, business or organization;
 - (f) Communication by an applicant, an interested party or their representatives with respect to an application for service, grant, planning approval, permit or other license, permission or approval:
 - i. With an employee of the City if the communication is restricted to providing general information on an application, including a proposed or pending application or to inquire about the application or the review process;
 - ii. With an employee of the City if the communication is part of the normal course of an approval process; and
 - iii. With respect to planning and development applications, if the communication is with an employee of the City who has a role in the processing of a planning application during the formal pre-application consultation, the filing of the application and the application review process, including the preparation of development agreements.
 - (g) Submitting a bid proposal as part of a procurement process and any communication with designated employees of the City as permitted in the procurement policies and procurement documents of the City;
 - (h) Communication with a public office holder by an individual on behalf of an individual, business or organization in direct response to a written request from the public office holder;

- (i) Communication to a Member of Council by a constituent, or an individual on behalf of a constituent on a general neighbourhood or public policy issue;
- (j) Communications directly related to those City-initiated consultative meetings where an individual is participating as a stakeholder; and
- (k) Communication for or against a policy or program that state a position where the primary focus is broad community benefit or detriment, whether City-wide or local, and where that position would have no direct, indirect or perceived benefit to a business or financial interest of the individual, business or other organization on whose behalf the communication is undertaken.

PART V – RESPONSIBILITIES

13. The Lobbyist Registrar is responsible for the following:
- (a) Overseeing the establishment and administration of the Lobbyist Registry;
 - (b) Enforcing the Lobbyist Registry By-law;
 - (c) Suspending, revoking or refusing registration;
 - (d) Providing advice, opinions and interpretation pertaining to the administration, application and enforcement of the Lobbyist Registry By-law;
 - (e) Advising Council on lobbying matters and recommending improvements to the Lobbyist Registry By-law;
 - (f) Conducting inquiries in respect of a request made by Council, a member of Council or a member of the public about compliance with the Lobbyist Registry By-law and the Lobbyist Code of Conduct attached as Schedule "A" to this By-law, as set out under section 223.12 of the *Municipal Act, 2001*.
 - (g) Making the Lobbyist Registry available for public inspection through electronic, web-based access at all reasonable times and in a manner that the Lobbyist Registrar may determine.
 - (h) Providing an annual report to Council and any other reports as the Lobbyist Registrar considers appropriate.
 - (i) Performing other duties as may be assigned by Council.
14. The public office holder is responsible for:
- (a) Advising lobbyists of the requirements to register with the Lobbyist Registry at the start of lobbying activities;
 - (b) Ceasing lobbying-related communication with a lobbyist who is prohibited from lobbying and reporting in a timely manner such lobbying to the Lobbyist Registrar.
 - (c) Responding and providing information in a timely manner to the Lobbyist Registrar with regards to an inquiry conducted under Section 13(f) of the Lobbyist Registry By-law.
15. The lobbyist is responsible for:
- (a) Complying with the requirements of the Lobbyist Registry By-law; and

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- (b) Complying with the Code of Conduct, attached as Schedule "A" to the Lobbyist Registry By-law.

PART VI – REGISTRATION PROCESS

16. No person shall lobby a public office holder without being registered as required under this Part unless otherwise exempted under Part IV.
17. A person with the intent to lobby may register as a lobbyist prior to the first lobbying communication with a public office holder and shall do so no later than five (5) business days after the lobbying communication takes place.

Step 1: Registration as a Lobbyist

18. The lobbyist shall set out in the registration the following information:
- (a) Name, title, and business address (where applicable);
 - (b) Whether the lobbyist is a consultant lobbyist, in-house lobbyist or voluntary unpaid lobbyist;
 - (c) The name of the individual, client or other organization, including all business names under which the individual, client or other organization is operating, on whose behalf the lobbyist is lobbying; and
 - (d) Such further information as the Lobbyist Registrar may require.
19. The Lobbyist Registrar will approve or refuse the registration in accordance with the requirements of the Lobbyist Registry By-law.

Step 2: Subject Matter Registration

20. The lobbyist shall set out in the registration the subject matter in respect of which the lobbyist intends to lobby the public office holder on:
- (a) Each subject matter that the lobbyist will lobby on;
 - (b) Description of the issue being lobbied, including particulars of any relevant City proposal, by-law, motion, resolution, policy, program, directive, grant, or guideline;
 - (c) Date on which the lobbying will start and finish, with the date on which the lobbying finishes being no more than twelve (12) months after the date on which the lobbying starts;
 - (d) Names of Members of Council and titles of other public office holders being lobbied; and
 - (e) Such further information as the Lobbyist Registrar may require.
21. A lobbyist shall update any changes to his or her registration within five (5) business days of the change taking place.
22. The Lobbyist Registrar will approve or refuse the registration in accordance with the requirements of the Lobbyist Registry By-law.

Step 3: Closure of Subject Matter Registration:

23. The lobbyist shall close the subject matter registration he or she has filed not later than thirty (30) days after the completion or termination of the lobbying activity.

24. The subject matter shall be closed once lobbying is complete or within twelve (12) months of lobbying commencing, whichever is sooner.
25. A subject matter registration may be extended beyond twelve (12) months at the sole discretion of the Lobbyist Registrar.

PART VII – ENFORCEMENT AND PENALTIES

26. The Lobbyist Registrar has the authority to conduct inquiries in respect of a request made by Council, a member of Council or by a member of the public about compliance with the Lobbyist Registry By-law or the Lobbyist Code of Conduct, attached as Schedule "A" to this By-law, as set out under section 223.12 of the *Municipal Act*, 2001.
27. The Lobbyist Registrar may impose the following penalties if he or she has determined that a lobbyist has not complied with the requirements of the Lobbyist Registry By-law:
 - (a) First contravention – a lobbyist may be prohibited from lobbying public office holders for 30 days;
 - (b) Second contravention – a lobbyist may be prohibited from lobbying public office holders for a period of 90 days; and
 - (c) Third or subsequent contravention – the Lobbyist Registrar will determine an appropriate penalty that is greater than a penalty for a second contravention.
28. Where the Lobbyist Registrar has suspended a lobbyist from lobbying, the Lobbyist Registrar shall inform the individual of the suspension in writing and provide the reason for the suspension in a manner determined by the Lobbyist Registrar.
29. Where the Lobbyist Registrar has suspended a lobbyist from lobbying, the Lobbyist Registrar shall post a notice of suspension on the City's website.
30. The Lobbyist Registrar may remove a lobbyist registration or subject-matter registration from the Lobbyist Registry if the Lobbyist Registrar determines that the individual did not comply with the requirements of the Lobbyist Registry By-law.
31. When a registration is removed from the Lobbyist Registry, the individual who filed it shall be deemed, for the purposes of his or her existing and future obligations under the Lobbyist Registry By-law, not to have filed the registration.
32. Pursuant to subsection 223.12(7) of the *Municipal Act*, 2001, if the Lobbyist Registrar determines, when conducting an inquiry, that there are reasonable grounds to believe that an individual has contravened a provincial Act or the Criminal Code of Canada, the Lobbyist Registrar shall immediately refer the matter to the appropriate authorities and suspend the inquiry pending the outcome of any resulting police investigation.

PART VIII – REVIEW OF THIS BY-LAW

33. The Lobbyist Registry By-law shall be reviewed no later than twelve (12) months after the day on which it comes into force.

SCHEDULE "A"
Lobbyist Code of Conduct

- 1. Honesty**
 - (a) Lobbyists shall conduct themselves with honesty and integrity in all dealings with public office holders and the City and at all times be open about their lobbying activities while maintaining any required confidentiality.

- 2. Disclosure of Identity and Purpose**
 - (a) Lobbyists communicating with public office holders shall disclose the identity of the individual, business or organization on whose behalf they are lobbying, as well as the subject matter of the communication.

- 3. Information and Confidentiality**
 - (a) Lobbyists shall inform their client, employer or organization of the obligations under the Lobbyist Registry By-law and their obligations to adhere to the Lobbyist Code of Conduct.
 - (b) Lobbyists shall provide information that is accurate and factual to public office holders.
 - (c) Lobbyists shall not knowingly mislead anyone and shall use proper care to avoid doing so inadvertently.
 - (d) Lobbyists shall not divulge confidential information unless they have obtained informed consent of their client, employer or organization or unless disclosure is required by law.
 - (e) Lobbyists shall not use any confidential information obtained in the course of their lobbying activities to the disadvantage of their client, employer or organization.

- 4. Competing Interests**
 - (a) Lobbyists shall not represent conflicting or competing interests without the written consent of those whose interests are involved.
 - (b) Lobbyists shall advise public office holders that they have informed their clients of any potential or actual conflict of interest and obtained the written consent of each client concerned before proceeding or continuing lobbying activities.
 - (c) Lobbyists shall not lobby public office holders on a subject matter for which they provide advice to the City.

- 5. Improper Influence**
 - (a) Lobbyists shall avoid both the deed and the appearance of impropriety.
 - (b) Lobbyists shall not knowingly place public office holders in a conflict of interest or in a breach of the public office holder's codes of conduct or standards of behaviour.

By-law Number 149 - 2015

PART IX – BY-LAW ADMINISTRATION

- 34. The Lobbyist Registrar shall administer the Lobbyist Registry By-law and establish any practices, policies, procedures necessary to implement the Lobbyist Registry By-law.
- 35. The Lobbyist Registrar shall prescribe all forms and notices, including any orders, necessary to implement the Lobbyist Registry By-law and may amend such forms and notices from time to time as the Lobbyist Registrar deems necessary.

PART X - GENERAL

- 36. All schedules attached hereto form part of the Lobbyist Registry By-law.
- 37. If any section, subsection or part or parts thereof are declared by a court of competent jurisdiction to be illegal, invalid or otherwise unenforceable, such provision shall be deemed to be severable and the remainder of the Lobbyist Registry By-law shall be declared to be separate and independent and enacted as such.
- 38. The Lobbyist Registry By-law shall come into effect on January 1, 2016.

READ A FIRST, SECOND AND THIRD TIME AND PASSED THIS 8th day of July, 2015.

Approved as to form.
 Jul 3, 2015
 REZ
 [Type Name]

Approved as to content.
 Jul 3, 2015
 [Signature]
 [Type Name]

[Signature]
 Linda Jeffrey, Mayor

[Signature]
 Peter Fay, City Clerk
 Earl Evans, Deputy City Clerk

By-law Number 149 - 2015

6. Restriction on Communication

- (a) Lobbyists shall not communicate in relation to a procurement process except as permitted by the City's procurement policies and procurement documents.
- (b) Lobbyists shall not engage in lobbying activities where the Lobbyist Registrar has prohibited them from lobbying for a specified time period.

10.2-216

APPENDIX “33”: Relevant Sections of Complaint Protocol

Section 2(3)

Initial Classification by Integrity Commissioner

The Integrity Commissioner may report to Council that a specific complaint is not within the jurisdiction of the Integrity Commissioner.

10.2-217

APPENDIX "34": Relevant Sections of *Municipal Conflict of Interest Act*

Section 5

DUTY OF MEMBER

When present at meeting at which matter considered

5 (1) Where a member, either on his or her own behalf or while acting for, by, with or through another, has any pecuniary interest, direct or indirect, in any matter and is present at a meeting of the council or local board at which the matter is the subject of consideration, the member,

- (a) shall, prior to any consideration of the matter at the meeting, disclose the interest and the general nature thereof;
- (b) shall not take part in the discussion of, or vote on any question in respect of the matter; and
- (c) shall not attempt in any way whether before, during or after the meeting to influence the voting on any such question. R.S.O. 1990, c. M.50, s. 5 (1).

Where member to leave closed meeting

(2) Where the meeting referred to in subsection (1) is not open to the public, in addition to complying with the requirements of that subsection, the member shall forthwith leave the meeting or the part of the meeting during which the matter is under consideration. R.S.O. 1990, c. M.50, s. 5 (2).

Exception, consideration of penalty

(2.1) The following rules apply if the matter under consideration at a meeting or a part of a meeting is to consider whether to suspend the remuneration paid to the member under subsection 223.4 (5) or (6) of the *Municipal Act, 2001* or under subsection 160 (5) or (6) of the *City of Toronto Act, 2006*:

1. Despite clauses (1) (b) and (c), the member may take part in the discussion of the matter, including making submissions to council or the local board, as the case may be, and may attempt to influence the voting on any question in respect of the matter, whether before, during or after the meeting. However, the member is not permitted to vote on any question in respect of the matter.
2. Despite subsection (2), in the case of a meeting that is not open to the public, the member may attend the meeting or part of the meeting during which the matter is under consideration. 2017, c. 10, Sched. 3, s. 3.

When absent from meeting at which matter considered

10.2-218

(3) Where the interest of a member has not been disclosed as required by subsection (1) by reason of the member's absence from the meeting referred to therein, the member shall disclose the interest and otherwise comply with subsection (1) at the first meeting of the council or local board, as the case may be, attended by the member after the meeting referred to in subsection (1). R.S.O. 1990, c. M.50, s. 5 (3).

Section 5.1

Written statement re disclosure

5.1 At a meeting at which a member discloses an interest under section 5, or as soon as possible afterwards, the member shall file a written statement of the interest and its general nature with the clerk of the municipality or the secretary of the committee or local board, as the case may be. 2017, c. 10, Sched. 3, s. 4.

Section 5.2

Influence

5.2 (1) Where a member, either on his or her own behalf or while acting for, by, with or through another, has any pecuniary interest, direct or indirect, in any matter that is being considered by an officer or employee of the municipality or local board, or by a person or body to which the municipality or local board has delegated a power or duty, the member shall not use his or her office in any way to attempt to influence any decision or recommendation that results from consideration of the matter. 2017, c. 10, Sched. 3, s. 4.

Exception

(2) However, if a municipality delegates a power to suspend the remuneration paid to a member under subsection 223.4 (5) of the *Municipal Act, 2001* or subsection 160 (5) of the *City of Toronto Act, 2006* to a person or body, and the person or body is considering exercising that power with respect to a member, subsection (1) of this section does not prevent the member from attempting to influence any decision or recommendation of the person or body that results from consideration of the matter. 2017, c. 10, Sched. 3, s. 4.

10.2-219

APPENDIX “35”: Relevant Rules of the Code of Conduct

Rule No. 2

Gifts and Benefits

1. No member shall accept a fee, advance, gift, loan, or personal benefit that is connected directly or indirectly with the performance of his or her duties of Office, except as specifically permitted by the exceptions listed below.

For these purposes, a fee or advance paid to or a gift or benefit provided with the member's knowledge to a member's spouse, child, or parent, or to a member's staff that is connected directly or indirectly to the performance of the member's duties is deemed to be a gift to that member. The following are recognized as exceptions:

- (a) compensation authorized by law;
- (b) such gifts or benefits that normally accompany the responsibilities of office and are received as an incident of protocol or social obligation;
- (c) a political contribution otherwise reported by law;
- (d) services provided without compensation by persons volunteering their time to a Member;
- (e) a suitable memento of a function honouring the Member (i.e. a trinket or favour of relatively little monetary value such as pen, notepad, t-shirts);
- (f) food, lodging, transportation and entertainment provided by provincial, regional and local governments or political subdivisions of them, by the Federal government or by a foreign government within a foreign country or by a conference, seminar or event organizer where the Member is either speaking or attending in an official capacity at an official event; (for greater certainty of item f, where Council has authorized or endorsed an initiative or event, this would be considered an official event.)
- (g) food and beverages consumed at banquets, receptions or similar events, for charitable, not for profit and community purposes, if:
 - 1. attendance serves a legitimate public duty purpose; and
 - 2. the value is reasonable and the invitations infrequent; and
- (h) business meals;
- (i) communication to the offices of a Member, including subscriptions to newspapers and periodicals related to the duties of Office.

10.2-220

- (j) Sponsorships and donations for community events or initiatives organized or run by a member or a third party on behalf of a Member where Council has authorized or endorsed the event or initiative. (for greater certainty of item j, for Member-organized community events or initiatives, Members should be transparent in their dealings with the public and should not handle any funds on behalf of any organizations and should remain at arms length from the financial aspects of these events and initiatives.)

Rule #2 Part 1(j) does not affect the entitlement of a Member of Council to:

- i. Use her or his office expense budget to run or support community events subject to the terms of the Councillor Expense Policy;
 - ii. Urge constituents, businesses and other groups to support community events put on by others in the Member's Ward or elsewhere in the City
 - iii. Play an advisory or membership role in any organization that holds community events in the
 - iv. Member's Ward; and
 - v. Collaborate with the City of Brampton and its agencies to hold community events.
2. Each Member shall disclose in a Gift Registry to be maintained in the Clerks department all gifts, benefits and hospitality received with an individual value of \$50 CAD or more from one source in a calendar year.

The member of Council shall specify for each gift, in a Gift Disclosure Statement to be maintained in the Gift Registry:

- The nature of the gift, benefit or hospitality
- The donor of the gift, benefit or hospitality and date of receipt
- The circumstances under which the gift or benefit was given and received
- The estimated value of the gift, benefit or hospitality, and
- The intended use of the gift or benefit.

The Clerk shall post quarterly, all Gift Disclosure Statements received, beginning with March 31, 2016, on brampton.ca.

Commentary

Gifts and benefits are often received by Members in the course of their duties, and attendance at public functions is expected and considered part of their role. The object of this rule is to provide transparency around the receipt of incidental gifts

10.2-221

and benefits, where the total value may be perceived as potentially influencing decision making.

Personal integrity and sound business practices require that relationships with vendors, contractors, or others doing business with the City, be such that no Member of Council is perceived as showing favouritism or bias toward the vendor, contractor or other. Each Member of Council is accountable to the public and should keep a list of all gifts received from individuals, firms or associations (with estimated values) in their constituency offices for review by Integrity Commissioner, as he/she deems appropriate. However, those gifts or benefits that exceed \$50 or the annual limit of \$50 for one source, shall be kept on a form prescribed by the Integrity Commissioner and filed with the office of the City Clerk on a quarterly basis.

Gifts that are subject to listing on the Member of Council information statement can be many types of things, and may include:

- property (i.e. a book, flowers, a gift basket, a painting or sculpture, furniture, wine);
- use of property or facilities (i.e. a vehicle, an office, a cottage) at a reduced rate or at no cost;
- membership in a club or other organization (i.e. a golf club) at a reduced rate or at no cost;
- an invitation to and/or tickets to attend an event (i.e. an athletic commercial event, concert, a play) at a reduced rate or at no cost;
- an invitation to attend a gala or fund-raising event at a reduced rate or at no cost.

An invitation to attend a function where the invitation is connected directly or indirectly with the performance of the Member's duties of Office (i.e. for which the public office holder has a ceremonial, presentational or representational official role) is not considered to be a gift. Attendance is considered to be the fulfillment of an official function or duty.

There are a range of expenses that support a Councillors' role in community development and engagement activities in their ward.

For MPPs, these expenses are generally paid for by caucus funds. This is not the case for municipal Members of Council. The section of the Councillor Expense Policy that deals with Community Expense-Events will indicate allowable expenses for reimbursement and provide for Members of Council to include certain community expenses related to a Member's role in community development as allowable expenditures from their office expense budget. However, gaming tickets

10.2-222

during charitable functions, such as raffle tickets, table prize tickets, etc. should not be eligible for reimbursement

3. Expenses incurred by Members of Council working during normal meal periods serve a legitimate public duty purpose, provided that the expenses incurred are reasonable and appropriate in the circumstances. Reasonable and appropriate expenses are those that:

- a. Are incurred for an official duty or function;
- b. Are modest, representing a prudent use of public funds;
- c. Do not involve alcoholic beverages unless in a ticketed event, the cost of such beverages is included in the ticket price.

In general, working meals are to be provided in-house.

Commentary

Rule #2 must be considered with and balanced against the principle contained expense policies in all Ontario municipalities, which is that Members are entitled to be reimbursed for expenses that are legitimately and appropriately incurred for an official duty or function and which are reasonable and prudent expenses and use of public funds in the circumstances. In making a determination of what constitutes a modest and prudent use of public funds, Members should consider the dollar amounts set out in the Council Expense Policy, as amended.

Given the heavy demands on Members' schedules in the performance of their duties and functions, there are legitimate circumstances that require business meetings over a meal period and result in the Member working through his or her normal meal periods.

"Official duties" or "functions" has the following meaning:

For Members of Council, it includes those activities that are reasonably related to a Member's office, taking into consideration the different interest, the diverse profiles of their wards and their different roles on Committees, agencies, boards and commissions.

For persons employed in the office of Members, it includes those activities and responsibilities that flow from acting on direction from or taking action on behalf of a member.

As representatives of the municipal government, Members will be expected or required to extend hospitality to external parties as part of their official duties and functions. This Code recognizes that through adherence to the current and proposed rules of the City's Councillor Expense Policy, it is legitimate for Members to incur hospitality expenses for meetings, examples of which include:

10.2-223

- a. Engaging representatives of other levels of government, international delegations or visitors, the broader public sector, business contacts and other third parties in discussions on official matters;
- b. Providing persons from national, international and charitable organizations with an understanding and appreciation of the City of Brampton or the workings of its municipal government;
- c. Honouring persons from Brampton in recognition of exceptional public service.

This Code recognizes that the current City of Brampton Councillor Expense Policy, holds legitimate that Members of Council will be reimbursed or have their office budgets charged for expenses that are incurred while extending hospitality to an external party, including hospitality that takes place in the course of travelling on a duty or function or a Member of Council provided the expenses are reasonable and appropriate in the circumstances.

Reasonable and appropriate expenses are expenses that strike a balance between economy (the expenses represent a prudent use of public funds) and proportionality (the expenses represent what is customary for such functions).

Wherever possible, Members of Council should utilize City-owned facilities and resources that are appropriate to the function.

4. This Code recognizes that as community leaders, Members of Council may lend their support to and encourage, community donations to registered charitable and Not for profit groups.

Monies raised through fundraising efforts shall go directly to the groups or volunteers and chapters acting as local organizers of the group. This Code recognizes the important work of Members of Council in supporting charitable causes and the need for transparency in Members' involvement.

This Code sets the following guiding principles for Members of Council:

- (a) Members of Council should not directly or indirectly manage or control any monies received relating to charitable organization's fundraising.
- (b) Where a Member of Council sponsors and/or lends support to a charitable organization's event, this Code recognizes that all donations are subject to the Code of Conduct.
- (c) No donation cheques should be made out to a Member of Council.

Nothing included herein affects the entitlement of a Member of Council to:

10.2-224

- i. Use her or his office expense budget to run or support community events subject to the terms of the Councillor Expense Policy section relating to Community Expense Events;
 - ii. urge constituents, businesses and other groups to support community events and advance the needs of a charitable organization put on by others in the Member's Ward or elsewhere in the City;
 - iii. play an advisory or membership role in any organization that holds community events in the Member's Ward; and
 - iv. collaborate with the City of Brampton and its agencies to hold community events.
- (d) Members of Council should not handle any funds on behalf of any charitable organization or Community group and should remain at arms length from the financial aspects of these community and external events.

Rule No. 9

Transparency & Openness in Decision Making and Member's Duties

1. Members shall endeavour to conduct and convey Council business and all their duties in an open and transparent manner other than for those decisions which by virtue of legislation are authorized to be dealt with in a confidential manner in closed session, so that stakeholders can view the process and rationale which was used to reach decisions, and the reasons for taking certain actions.

Commentary

Various statutes, City by-laws, policies and procedures, as well as, decisions of courts and quasi-judicial tribunals form the basis of decisions made by City Council. Unless prohibited by legislation or by-law, Members of Council should clearly identify to the public how a decision was reached and upon which law, procedure and policy their decision was based.

Rule No. 18

Failure to Adhere to Council Policies and Procedures

1. Members shall adhere to such by-laws, policies and procedures adopted by Council that are applicable to them.

10.2-225

Commentary

A number of the provisions of this Code of Conduct incorporate policies and procedures adopted by Council. More generally, Members of Council are required to observe the terms of all policies and procedures established by City Council.

Members must pay special attention to, and comply strictly with the Councillors Expense Policy.

This provision does not prevent a member of Council from requesting that Council grant an exemption from a policy.