

City of Pembroke Integrity Commissioner

Report following investigation of complaint respecting email issued by Councillor
Lafreniere

Submitted: July 2, 2025

A formal complaint was submitted to the City Clerk on June 20, 2025. The complaint is summarized as follows:

“Councillor Patricia Lafreniere has violated her oath of office, the Municipal Conflict of Interest Act, and the City's Code of Conduct through:

Abuse of office by telling a constituent to "relocate" rather than addressing legitimate policy concerns

Failure to maintain dignity of office through unprofessional and retaliatory correspondence

Conflict of interest in matters relating to social services and addiction issues

Intimidation of constituents exercising their democratic rights to criticize municipal policy

These violations occurred in the context of ongoing municipal failures to address serious public safety and zoning violations at 247 & 273 Victoria Street, Pembroke.”¹

What is at issue is an email authored and sent to one of the complainants by Councillor Lafreniere on June 19, 2025 in which she stated the following:

“Perhaps, you should relocate as this seems to be posing a mental health problem for yourself.

I am copying this correspondence to the Mayor as verbal abuse is not acceptable. I will no longer respond.”

¹ Note that italicized type is used when quoting from the complaints, from emails and from the complainant throughout this report.

Significant background and context was provided and reviewed as part of my investigation, that related to concerns the complainants had with all of Council and with responses provided by the CAO regarding the steps the City has been taking to investigate issues with a premises located in the vicinity of the complainants. Suffice it to say, the complainants were not satisfied that the City or the OPP were taking sufficient actions to address their concerns. The details of those concerns are not relevant for the purpose of this report, except to the extent they are referred to below.

The City of Pembroke is governed by a mayor, a deputy-mayor, and five councillors who are appointed at-large, meaning all members of council represent the constituents of the whole City. It is not divided into wards. What is missing from the complaint is an email authored by one of complainants on June 18th to Councillor Lafreniere only which she titles “Social services not working” in which she makes very personal comments that are critical of Councillor Lafreniere. Her email makes several personal attacks against Councillor Lafreniere, including “*I am sick and tired of having to deal with your failings.*” It goes on to discuss her dissatisfaction with Council and ends with: “*Please stop with the bleeding heart services and start with a law and order, tough love approach if you’re at all interested in fixing Pembroke. Maybe you need to chat more with the county. Maybe you should stop pandering to this bullshit of addicts and drug dealers and their “rights”. It’s disgusting that normal people (yes, normal law-abiding respectful courteous people) are now second class citizens who keep footing the bill for these social pirayas.*” Councillor Lafreniere’s response to this email as set out above, is what forms the basis of the complaint under the Code of Conduct.

Appointment and Authority

I was appointed Integrity Commissioner for the City of Pembroke in February, 2025 by By-Law Number 2025-21. As such I am responsible for providing advice and education to members of council regarding matters related to ethics, conduct

and conflicts of interest among other things. I am also responsible for independently and impartially investigating complaints respecting any alleged breach of the Code of Conduct or of the *Municipal Conflict of Interest Act* (MCIA). Once an investigation is complete where I determine that there was a breach of the Code of Conduct or MCIA, it is my duty to render an opinion and recommend a sanction where appropriate. I do not have authority to impose any sanction or penalty.

Issues raised under MCIA heading in Complaint

The complainants take the position that Councillor Lafreniere has a personal bias in favour of social services and support for addiction-related municipal decisions, to the extent that her ability to make objective decisions is impaired. This bias is allegedly the result of family matters that are personal to Councillor Lafreniere and will not be set out here. Allegations made under this heading in the complaint are also made of “victim-blaming” by Councillor Lafreniere, based on what the complainants see as her prioritizing her agenda over legitimate safety concerns of local residents, and blaming the victims of her poor decision-making.

Findings respecting MCIA issues

The MCIA deals with the pecuniary interests of a member of council as it exists at the time a matter is voted on. A member of council must recuse themselves from participating in any vote in which they have a direct or indirect pecuniary or financial conflict of interest as described in the legislation, subject to specific exceptions. The allegations in the complaint do not allege pecuniary interest and instead focus on bias. As such, the complaint respecting a violation of the MCIA is unfounded.

Issues raised respecting Section 223.4(1) of the Municipal Act

The complaint states:

“Violation: Municipal Act, Section 223.4(1) - Abuse of Office

Evidence: In her email dated June 19, 2025, Councillor Lafreniere told constituent Pola Hallquist to "relocate as this seems to be posing a mental health problem for yourself" rather than addressing legitimate policy concerns.

Analysis:

Elected officials have a duty to respond professionally to constituent concerns

Telling residents to leave town rather than addressing municipal failures is an abuse of her position

This response accurate based on public statements and admissions by Lafreniere which also illustrate Lafreniere's ongoing conflicts of interests related to these matters. effectively silences democratic criticism and undermines residents' rights to hold council accountable

The tone of Ms. Hallquists criticism, while may appear harsh, match the massive and ongoing harms to our safety and wellbeing for over 3 years, and are factually accurate based on public statements and admissions by Lafreniere which also illustrate Lafreniere's ongoing conflicts of interests related to these matters. “

Findings respecting section 223.4(1) of the Municipal Act

Section 223.4(1) of the Municipal Act sets out the authority of the Integrity Commissioner, if the Integrity Commissioner deems it appropriate, to conduct an inquiry following a request to do so. The substantive matters at issue in this complaint relate to the complainant's dissatisfaction with how the City has handled matters related to the property at 247 Victoria Street, and not to the conduct of Councillor Lafreniere or any other member of Council, so there is no basis to consider conducting an inquiry. Councillor Lafreniere does not deny making the comment complained of.

Issues raised under Code of Conduct

I will respond to the alleged violations identified in the complaint that reference the Code of Conduct in the order in which they are written, but renumbered to group code of conduct matters together.

1. *"FAILURE TO MAINTAIN DIGNITY OF OFFICE & GENERAL CONDUCT*

Violation: Code of Conduct - Professional Standards, Council Code of Conduct 2019.-23 Section 6.0 General Conduct

Evidence: Councillor Lafreniere's response was unprofessional, dismissive, and retaliatory, including:

Personal attacks rather than policy discussion

Characterizing legitimate criticism as "verbal abuse"

Threatening to escalate to the Mayor as intimidation

Analysis:

Elected officials must maintain professional standards even when criticized

Personal circumstances do not excuse unprofessional conduct in official capacity

Her response falls below the standard expected of municipal representatives"

2. The Ultimate Violation - Victim Blaming: The most egregious aspect of Councillor Lafreniere's conduct is that when residents presented evidence of serious harm to their mental health and safety caused directly by her biased policies, she responded by telling them to "relocate as this seems to be posing a mental health problem for yourself." This response:

- Blames victims for the consequences of her poor decision-making*
- Dismisses legitimate safety concerns as our own personal failings*
- Demonstrates complete abdication of her duty to protect residents*
- Shows she prioritizes her personal agenda over public safety*
- Constitutes psychological abuse of constituents by a person in authority*

Violations:

General Conduct sec 6.3(f) Members shall not extend preferential treatment to any individual or organization

Conflict of Interest sec 9.3(a), (b), (3); 9.5 (c), (d), (e)

3. INTIMIDATION AND RETALIATION

Violation: Code of Conduct - Respectful Treatment

Evidence:

Threatening to copy the Mayor on correspondence as intimidation

Characterizing policy criticism as "verbal abuse" to silence constituent concerns

Refusing to engage with legitimate municipal issues

Analysis:

This creates a chilling effect on residents' ability to criticize municipal policy

Constitutes retaliation against a constituent exercising democratic rights

Undermines the democratic process and accountability."

The complaint also relies on references an "inadequate municipal response" received on June 11th to a recent complaint concerning a property at 247 Victoria Street. The initial complaint appears to have been made on June 6, 2025, when the complainants advised City staff and council and the OPP of the unintended consequences that followed the OPP shutting down a boarding house on Pembroke Street East. The allegations regarding how the City handled the complaint demonstrate the lack of understanding and unreasonable expectations of the complainant. The comments made are only relevant to this matter in that they end with the sentence: "This inadequate response has left residents without municipal protection and forced to escalate their concerns through democratic processes, including direct communication with elected officials." The next outreach appears to be the email to Councillor Lafreniere on June 19th.

Findings respecting Code of Conduct complaints

Regarding the first Code of Conduct complaint and an alleged unprofessional response, I find the language used by Councillor Lafreniere about relocating was not professional. The complaint states that the Councillor responded to a policy matter with a personal attack, and I find the complaint is not substantiated in this regard. There was no policy discussion in the email sent by the complainant. In fact, the complainant's email was the personal attack against Councillor Lafreniere. Having said that, public officials are held to a higher standard than the general population, and Councillor Lafreniere's remark was unprofessional.

Regarding the second matter and alleged victim blaming, where the complaint states that Councillor Lafreniere's comment about relocating, followed a resident expressing concern about mental health and safety, I find this complaint is substantiated. Councillor Lafreniere admitted that she made the comment complained of but stated that she did not intend for it to be taken as anything other than concern for the wellbeing of the complainant it was made to. Councillor Lafreniere is aware of the likely use of the property complained of as a boarding house and advises that the City and OPP are taking steps to deal with it as best they can. Councillor Lafreniere admitted that she supports the Grind, another facility of concern to the complainants, but does not support everything they do and does not always vote in support of their requests. I do not have reason to doubt this and I accept her evidence in this regard. I also accept that Councillor Lafreniere's statement was made to try and assist the complainant by suggesting she move away from the property that is creating issues for her, and find that it was not intended to be abusive. Having said that, Councillor Lafreniere did breach the Code of Conduct in her choice of language.

Regarding the third matter, and the reference made to copying the Mayor and intimidation, when researching this matter I was provided with a second email from the complainant that is dated less than an hour after receiving Councillor Lafreniere's email in which she says:

"Already forwarded my email to you to all council members last night.

If you think the truth is verbal abuse, then maybe you should relocate yourself off of council.”

Given the second email issued by the complainant where she advises that she has shared her email to Councillor Lafreniere with the entire council, I find that the allegation against Councillor Lafreniere regarding intimidation is not substantiated. It is difficult to see a reference to advising the Mayor of the email exchange as a threat or intimidation when the complainant chose to advise all of council including the Mayor of this exchange.

Comments

I am concerned about public expectations and perhaps lack of information about the role of members of council, given some of the comments made in this complaint. In carrying out their duties, members of Council fill three important roles:

1. representative role – no single correct approach to how to represent your constituents
2. policy-making role—identify issues, engage the public and seek input from professional staff, and reach agreement /majority consensus on best course of action and vote on policy direction for staff to implement
3. stewardship role -ensure the municipality’s resources are being used as efficiently as possible

It is the Mayor’s job under the *Municipal Act, 2001* to chair meetings and provide the leadership necessary for Council to carry out its roles.

Councillor Lafreniere was correct to reach out to the Mayor when she received the first email from the complainant, and the Mayor provided appropriate leadership in his response to the complainant.

Each councillor will face many challenges over their term(s) in office as there will always be multiple perspectives on matters that come before council, and because it is impossible to represent the views of all constituents all of the time. Members of council are elected to their position and bring with them life experiences, plus

work, family, community and other volunteer influences that will shape how they view matters, and this is expected. While there is no single correct approach to how a councillor fulfills this role, it is expected that councillors will do so with an open mind and without bias or predetermining the matters presented to Council for decision. It is not within my jurisdiction as Integrity Commissioner to determine whether Councillor Lafreniere demonstrated bias in her approach to matters before Council. My jurisdiction is to respond to Code of Conduct and MCIA matters.

The Code of Conduct for City of Pembroke Council and Local Board Members begins with the following purpose and policy statement:

“The Corporation of the City of Pembroke is committed to achieving the highest quality of municipal administration and governance by encouraging high standards of conduct on the part of all elected officials and members of its Boards and Committees. A code of conduct aims to ensure public trust and confidence in the Municipality’s decision-making and operations. The public should expect the highest standards of conduct from the members they elect to local government, as well as members serving on Boards and Committees. In turn, adherence to these standards will protect and maintain the Municipality’s reputation and the integrity of its decision making process.”

The Code of Conduct reinforces my comments regarding the roles of council, described above. The complainants continue to send emails to city council setting out their expectations and demanding action. It is the right of residents to reach out to their elected officials and it is expected that City officials will respond appropriately. The language used by the complainants however, is not what I would expect to see when addressing city council and demonstrates an expectation that council will take the action they demand. This is not realistic. Members of council represent the entire community. There is no breach of the Code of Conduct if council acts in a different manner, or if an individual councillor holds a contrary opinion to a resident. Members of Council are elected to make the policy decisions they feel appropriate based on the professional advice provided to them by staff, community input, organizations like the Association of

Municipalities of Ontario (AMO) and Federation of Canadian Municipalities (FCM) and other sources. Members of council and municipal staff may be acting in ways that the complainants expect but may not be able to provide detailed information to residents for a number of reasons related to privacy and other legal limitations. It may not be accurate to describe the actions of the City as an “inadequate municipal response”.

It is unfortunate that in today’s world so many individuals choose to lash out with abusive comments and complaints in response to actions taken by council or an individual council member that are either not aligned with their wishes or take too long. There is no code of conduct that governs how the public addresses public officials. I make these comments because I believe that Councillor Lafreniere has also been subjected to verbal abuse and comments that lack civility. She however must rise above that and respond professionally.

Recommendations:

Educating the public about the role of council and strengthening council policies where possible that address this growing toxicity is recommended.

Regarding the complaint and Councillor Lafreniere’s remark, an apology is recommended. A reprimand is not recommended as it is my finding that the complainant’s actions in verbally attacking Councillor Lafreniere personally in the June 18th email that started the discussion complained of is directly responsible for the lack of respect shown in the language used by the Councillor.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'MEB', with a stylized, flowing script.

Mary Ellen Bench, BA, JD, CS, CIC.C

City of Pembroke Integrity Commissioner

maryellen@benchmunicipal.com

416-409-5607