

*Principles
Integrity*

Integrity Commissioner's
Recommendation Report
Regarding Complaint Against Councillor Lisa Robinson
October 20, 2025

Executive Summary:

- [1] This report results from a complaint filed against Councillor Lisa Robinson in relation to her receiving funds through a crowd-sourcing campaign ("Give-Send-Go") in breach of the Gifts Policy under the Council Code of Conduct.
- [2] We find that the complaint is substantiated and that the Councillor's conduct breached the Code of Conduct by accepting funds in breach of the Gifts Policy.
- [3] This is the second time that we have found the Councillor to have breached the Gifts Policy through receiving crowd-sourced funds and the eighth time we have had to report to Council following complaints against the Councillor.
- [4] We are recommending a 90-day suspension of pay.

Process

- [5] In conducting this investigation, Principles *Integrity* applied the principles of procedural fairness and was guided by the complaint process set out under the Code.
- [6] This fair and balanced process includes the following elements:
 - a. Reviewing the complaint to determine whether it is within scope and jurisdiction and in the public interest to pursue, including giving consideration to whether the complaint should be restated or narrowed, where this better reflects the public interest;
 - b. Notifying the Respondent, and providing her with the opportunity to respond in full to the allegations;
 - c. Reviewing the Code, all relevant documentation including watching the videos posted, and interviewing relevant witnesses as necessary; and,
 - d. Providing the Respondent with the opportunity to review and provide comments to the Integrity Commissioner's Preliminary Findings Report, prior to finalizing and submitting a Recommendation Report.

Code Provisions

Principles Integrity

[7] Relevant provisions of the Code are set out below:

01. Gift or Benefit - means anything of value including but not limited to cash or monetary equivalent, fee, object of value, service, meal, travel, accommodation, or entertainment.

04.04 Despite anything else in this Code, a Member shall not accept a Gift or Benefit of value greater than \$500.00 and shall not accept from a single source during a 12-month period Gifts and Benefits of total value greater than \$500.00.

04.05 A Member who receives a Gift or Benefit of value greater than \$200.00, or received from a single source during a 12-month period Gifts and Benefits of total value greater than \$200.00, shall within 30 days of receipt, file a Disclosure Statement with the City Clerk.

Complaint:

[8] On July 3, 2025 a complaint was filed by Mayor Ashe alleging that a GiveSendGo fundraising campaign had been established, for which the funds were destined for Councillor Robinson.

[9] Councillor Robinson has been the subject of numerous Code of Conduct complaints, which have resulted in six Recommendation Reports to Council recommending monetary sanctions pursuant to the *Municipal Act*.

[10] Following the first Recommendation Report, on September 25, 2023 Council suspended the Councillor's pay for 30 days.

[11] In an on-line interview in the days that followed, the Councillor participated as a guest to express her disagreement with the outcome of that Report. The host of the broadcast, while confirming with the Councillor's lawyer that he would undertake a judicial review of the Report 'pro bono' (without compensation), nevertheless asked viewers to contribute financially to the cost of Councillor Robinson's legal challenge to that Report.

[12] As well, the Councillor's web page contains a 'Donate' button which links to a GiveSendGo page.

[13] A screenshot of the GiveSendGo account page which was forwarded with the complaint on July 3, 2025 indicated that \$13,466 had been raised to date.

Principles Integrity

[14] The GiveSendGo account page notes as follows:

Campaign created by Terry Rekar
Campaign funds will be received by Lisa Robinson

[15] The text on that screenshot, at that time, advises that money donated will be given to Councillor Lisa Robinson:

“The funds raised will help cover her living expenses, legal fees, and the costs associated with defending her right to speak truth to power.”

[16] On the date of drafting of this Preliminary Findings Report, the GiveSendGo account page (which appears refreshed) indicates \$1,055 has been raised.

[17] GiveSendGo funds are available to be withdrawn by the creator of the campaign.

[18] There is a statement on GiveSendGo that *“funds raised were to help cover Councillor Robinson’s living expenses, legal fees and costs associated with defending her right to speak truth to power”*.

[19] We note that the amount of \$13,466 accumulated in the fund shown on July 3, 2025 then changed to \$1,055 on August 25, 2025.

[20] One must understand that the funds of \$13,466 were drawn down between July 3 and August 25, 2025.

[21] Based on the statement that all funds raised will be donated, in effect, to Councillor Robinson, we think it a fair inference that the funds drawn down were provided to Councillor Robinson.

[22] A monetary donation to Councillor Robinson would constitute a ‘gift or benefit’ to her.

[23] The Code provision requires that members who receive a gift or benefit of value greater than \$200.00 file a Disclosure Statement with the Clerk within 30 days of receipt.

[24] We note that, as of the date of this Report, no gift Disclosure Statement has been filed by the Councillor to account for funds received from the GiveSendGo campaign.

Analysis and Findings:

Principles Integrity

[25] This same issue was previously addressed in a Recommendation Report which we provided to Pickering Council in September 2024.

[26] The complaint at that time – that Councillor Robinson was the beneficiary of a Give-Send-Go account established to collect money on her behalf – was found to cause Councillor Robinson to be in breach of the Code of Conduct.

[27] The following extract from that Recommendation Report is germane and we adopt the same reasoning in this Report:

[61] In the response to this complaint, Councillor Robinson indicates that the funding is intended to assist her with the legal fees she is incurring on the judicial review. This is contradicted by an interview she gave to Derek Sloan where it is clearly stated that this money is intended to replace her salary.

[62] The Give-Send-Go page itself, which continues to be active, states that the funding will go directly to Councillor Robinson. Despite her assertions that she did not set this page up to benefit herself, her personal webpage contains an active “donate” button that links directly to the Give-Send-Go account. She acknowledges that the purpose of this button is to allow people access to the site if they wish to provide her with money.

[63] Councillor Robinson advises that she has no role in respect of this account, and that she is unaware of how much money, if any, has been raised through the account. Further, she states that any money raised is or will be directed to her lawyer. Whether or not the money comes to her or is directed to others on her behalf to satisfy her own financial obligations is irrelevant, as payment of her legal fees clearly constitutes a financial benefit to her.

[64] Importantly, Councillor Robinson claims that the funding will not have any undue influence on her decisions as a councillor. We find that to be inaccurate. The funding is replacing the pay she is not receiving as a direct result of legislatively approved sanctions for violating the Code. Allowing her to benefit from this, essentially avoiding the impact of the sanctions, encourages continued disregard for the Code and renders the concept of sanctions to be meaningless, which clearly has an ability to impact her behaviour as a councillor. While the Councillor indicates she will be complying with “fundraising rules”, it is noted that fundraising rules apply to municipal election campaigns, and not ongoing fundraising for personal matters.

[65] Finally, as this funding is intended to act as income replacement, whether such funding would constitute reportable income is not within the purview of this report but bears consideration in other contexts.

[66] We find that Councillor Robinson has received or is intending to receive a benefit from a single source – a group of individuals ensuring she will not face the impact

Principles

Integrity

of previous sanctions imposed upon her for contravening the Code. Despite alleging that she is unaware of the amount raised and making no effort to ascertain that figure when asked for clarification, we find that there is nonetheless a benefit that is accruing to the Councillor in contravention of section 4 gift provisions set out in the Code.

[28] We find that Councillor Robinson has breached the Gifts provisions of the Code of Conduct in accepting funds which constitute a Gift or Benefit of value greater than \$500.00, or received from a single source during a 12-month period.

[29] The purpose for having a gift provision in a Code of Conduct – which is one of the four prescribed subjects presently required in a Code of Conduct – is to ensure that members of municipal Councils are not inappropriately influenced by the largesse of their supporters, private interests, or special interest groups, and to daylight sources of legitimate gifts and benefits received, by requiring a public disclosure above certain value thresholds.

[30] A financial contribution – the receipt of funds, or the paying by a third party of a councillor's financial obligations (legal fees, mortgage payments, etc.) falls under the definition of gift or benefit.

[31] In the course of our investigation, the Councillor defended her conduct by asserting that, as we have already investigated this type of breach in the past, it would constitute an abuse of process for us to investigate the same pattern of behaviour. the Councillor claims that this complaint 'duplicates' a matter already adjudicated.

[32] The fact that we have determined previously that accepting donations from crowd-funding is subject to the Code provisions regarding gifts and benefits should be understood as a caution against repeating the behaviour, not an inoculation against subsequent complaints.

[33] The Councillor also, in the same vein as previously, claimed no control over the creation, existence or disbursement of funds in the account.

[34] Despite her assertions that she did not set this page up to benefit herself, her personal webpage contains an active "donate" button that links directly to the Give-Send-Go account. She acknowledges that the purpose of this button is to allow people access to the site if they wish to provide her with money.

[35] The Councillor claims that there is no evidence of funds being provided to her, and protests that we should not draw an inference.

[36] We note that the Give-Send-Go page itself, which continues to be active, states that the funding will go directly to Councillor Robinson.

Principles Integrity

- [37] We further note that the Councillor has not denied receiving – or benefitting from – such funds.
- [38] On the basis of the clear statement of purpose set out on the GiveSendGo account, the fact that the funds which were \$13,466 in July were only \$1,055 in August, and the fact that the Councillor has not denied that the funds were allocated for her benefit to financial obligations incurred by her, we believe it is a reasonable inference to draw that she has received the benefit of such funds.
- [39] Unlike the standard of proof on a prosecution which is beyond a reasonable doubt, the standard of proof on an investigation by an Integrity Commissioner is to make findings of fact based on a balance of probabilities.
- [40] On this basis, we find that the Councillor received the benefit of the funds which were drawn down on the GiveSendGo account.
- [41] Finally, the Councillor claims that restricting her ability to fundraise to pay her legal fees – legal fees which have been largely incurred through unsuccessful attempts to challenge the Council decisions to impose monetary sanctions for previous findings of Code violations – infringes her Charter rights of access to justice.
- [42] While the Charter protects access to justice, that Charter right does not override the Councillor's obligations under the Code, nor are the gift and benefit provisions dispensed with simply because the funds donated for the Councillor's benefit are used to offset legal fees incurred by her.

Recommendations and Concluding Remarks:

- [43] An Integrity Commissioner's investigation report is not simply the conclusion of a technical exercise to determine whether there has been a breach of codified standards of behaviour. Our role is more than simply the task of bringing adjudication to grievances between individuals. As noted below, we see as our highest objective in concluding an investigation to be the making of recommendations that serve the public interest.
- [44] The Integrity Commissioner's role is as much about education as it is about adjudication, so that municipal government can function better, and that members of the public are able to confidently conclude that members of their municipal council are acting with integrity.
- [45] Under the *Municipal Act*, upon receipt of a recommendation report from the integrity commissioner, Council may impose a reprimand or a suspension of pay for a period of up to 90 days.

Principles

Integrity

[46] We note that this is the eighth time that we have had to report publicly in regard to conduct of Councillor Robinson that has been found to breach the Code of Conduct and on each occasion, a suspension of pay has been imposed.

[47] The purpose of sanctioning through a suspension of pay is to impose a consequence which may result in a change of behaviour, an adjustment to align with ethical expectations, to adhere to the Code of Conduct.

[48] Unfortunately, it appears that crowd-funding by her supporters is now not only removing the sting of the penalty imposed by Council, but resulting in a further breach of the Code by the Councillor.

[49] While it appears futile to continue to impose additional monetary penalties, the remedial tools available to an Integrity Commissioner and to Council under the current Municipal Act are deficient.

[50] Therefore, recognizing that a suspension of pay is the only available remedy, we again recommend Council impose a suspension of pay.

[51] We therefore recommend:

[1] That the remuneration paid to Councillor Robinson be suspended for a period of 90 days.

[52] We will be available to introduce this report and respond to questions regarding its contents during the Council meeting at which this report is considered.

Principles Integrity

About Principles Integrity and the Complaint Process

Principles Integrity was appointed the Integrity Commissioner for the City of Pickering on November 15, 2022. We are also privileged to serve as Integrity Commissioner for a number of other Ontario municipalities. The operating philosophy which guides us in our work with all of our client municipalities is this:

The perception that a community's elected representatives are operating with integrity is the glue which sustains local democracy. We live in a time when citizens are skeptical of their elected representatives at all levels. The overarching objective in appointing an integrity commissioner is to ensure the existence of robust and effective policies, procedures, and mechanisms that enhance the citizen's perception that their Council (and local boards) meet established ethical standards and where they do not, there exists a review mechanism that serves the public interest.

The City has as part of its ethical framework a Code of Conduct which is the policy touchstone underlying the assessments conducted in this report. It represents the standard of conduct against which all members of Council are to be measured when there is an allegation of breach of the ethical responsibilities established under the Code of Conduct. The review mechanism contemplated by the Code, one which is required in all Ontario municipalities, is an inquiry/complaints process administered by an integrity commissioner.

Integrity commissioners carry out a range of functions for municipalities (and their local boards). They assist in the development of the ethical framework, for example by suggesting content or commentary for codes of conduct. They conduct education and training for members of council and outreach for members of the community. One of the most important functions is the provision of advice and guidance to members to help sort out ethical grey areas or to confirm activities that support compliance. And finally, but not principally, they investigate allegations that a person has fallen short of compliance with the municipality's ethical framework and where appropriate they submit public reports on their findings, and make recommendations, including recommending sanctions, that council for the municipality may consider imposing in giving consideration to that report.

It is important that this broad range of functions be mentioned in this investigation report. Our goal, as stated in our operating philosophy, is to help members of the Pickering community, indeed the broader municipal sector and the public, to appreciate that elected and appointed representatives generally carry out their functions with integrity. In cases where they do not, there is a proper process in place to fairly assess the facts and, if necessary, recommend appropriate sanctions. In every case, including this one, the highest objective is to make recommendations that serve the public interest, if there are recommendations to be made.

Our role differs from other 'adjudicators' whose responsibilities generally focus, to state it colloquially, on making findings of fact and fault. While that is a necessary component when allegations are made, it is not the only component.

Our operating philosophy dictates the format of this report. The tenets of procedural fairness require us to provide reasons for our conclusions and recommendations, and we

Principles

Integrity

have done that. Procedural fairness also requires us to conduct a process where parties can participate in the review and resolution of a complaint.