



Cunningham Swan

LAWYERS

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CONFIDENTIAL

September 26, 2025

SENT BY EMAIL TO: rzanussi@ramara.ca

Township of Ramara
c/o Rebecca Zanussi, Executive Assistant
2297 Hwy 12 P.O. Box 130
Breachin, ON
L0K 1B0

Dear Council:

RE: Code of Conduct Complaint – Final Report
Our File No. 37629-26

Please be advised that our Code of Conduct investigation is now complete. We attach the final report herewith and the report should now be circulated to members of the Council.

This investigation is hereby closed.

Sincerely,

Cunningham, Swan, Carty, Little & Bonham LLP

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c/o Rebecca Zanussi, Executive Assistant
2297 Hwy 12
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Brechtin, ON
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Dear Council:

**RE: Code of Conduct Complaint – Final Report – Councillor Sherri Bell
Our File No. 37629-26**

This public report of our investigation is being provided to Council in accordance with Section 223.6(1) of the *Municipal Act*. We note that Section 223.6(3) of the *Municipal Act* requires that Council make the report public. The Clerk should identify on the agenda for the next open session Council meeting that this report will be discussed. Staff should consider whether it is appropriate to place the full report on the agenda in advance of Council deciding how the report should otherwise be made public.

Should Council desire, the Integrity Commissioner is prepared to attend virtually at the open session meeting to present the report and answer any questions from Council.

At the meeting, Council must first receive the report for information. The only decision Council is afforded under the *Municipal Act* is to decide how the report will be made public, and whether to adopt any recommendations made by the Integrity Commissioner. Council does not have the authority to alter the findings of the report, only consider the recommendations.

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The Integrity Commissioner has included only the information in this report that is necessary to understand the findings. In making decisions about what information to include, the Integrity Commissioner is guided by the duties set out in the *Municipal Act*. Members of Council are also reminded that Council has assigned to the Integrity Commissioner the duty to conduct investigations in response to complaints under the Code of Conduct, and that the Integrity Commissioner is bound by the statutory framework to undertake a thorough process in an independent manner. The findings of this report represent the Integrity Commissioner's final decision in this matter.

Timeline of Investigation

The key dates and events during the course of this investigation are as follows:

- August 11, 2025, complaint received
- August 12, 2025, preliminary review completed
- August 14, 2025, compliant package sent to member
- August 22, 2025, Member requests extension for response
- August 22, 2025, extension granted
- September 17, 2025, response from Member received
- September 22, 2025, receive documents from Township

Complaint Overview

A Complaint was received on August 11, 2025. The Complaint alleged breaches of the Code of Conduct by Councillor Sherri Bell (the "Member").

In May of 2024, Council passed a resolution that, among other things, stated that, "Councillor Bell will no longer have the ability to contact staff directly or indirectly, all correspondence shall be conducted with the Chief Administrative Officer."

The complaint alleged that the Member breached this direction by sending emails that: communicated directly with staff; communicated with staff and copied the CAO; and communicated with the CAO and copied staff. The complaint also alleged that the substance of the Member's communications with staff was often focused on past grievances, perceived slights or accusatory narratives directed to Council and administration.

Examples of emails sent by the Member were provided in the complaint and forwarded to the Member as part of the complaint package.

Code of Conduct

The following provisions of the Code of Conduct are relevant to our findings in this investigation:

5.6 It shall be the duty of all Members to abide by all applicable legislation, policies and procedures pertaining to their position as a Member.

5.8 Every Member in exercising his or her powers and in discharging his or her Official Duties shall seek to serve the public interest by upholding both the letter and spirit of the laws of Parliament and the Ontario Legislature, as well as the laws and policies adopted by the Township Council.

5.13 Members of Council:

(a) May not impugn or malign a debate or decision or otherwise erode the authority of Council;

6.1 Members shall accurately and adequately communicate the decisions of Council and Local Boards such that respect for the decision-making process is fostered.

19.4 Inquiries of staff from Members should be directed to the Chief Administrative Officer or the appropriate senior Managers as directed by the Chief Administrative Officer.

Investigation Process

In conducting the investigation, the Integrity Commissioner reviewed the email communications attached to the complaint. The Member was provided with the complaint and the attached emails and given an opportunity to respond.

The Member made written submissions in response to the complaint, which were considered and formed part of the investigation.

Given that the allegations involved emails, the Integrity Commissioner was satisfied that the written record was sufficient to make findings of fact.

Findings

The email communications provided demonstrate that the Member disregarded Council's direction to communicate only with the CAO. Various emails in the sample provided were addressed to different staff members. In some emails the Member addressed the email to staff

and copied the CAO; in others the Member addressed the email to the CAO but copied other staff. Within the body of certain emails, the Member addressed specific questions to specific staff members, making it clear that the communication was to staff directly.

In their written submission, the Member took the position that all of her communications were “with the CAO”; meaning that provided the CAO was addressed in the email, the email was compliant with the Council direction, even where other staff were sent the communication.

It is important to read the wording of the Council resolution:

“Councillor Bell will no longer have the ability to contact staff directly or indirectly, all correspondence shall be conducted with the Chief Administrative Officer.”

The resolution is clear that the Member no longer has the “ability to contact staff directly or indirectly”, and that all correspondence will be with the CAO. Copying staff on emails to the CAO or copying the CAO on emails directed to staff is a breach of this direction. The Integrity Commissioner also notes that the substance of certain emails was directed specifically to staff members, referring to the staff person by name in the body of the email and asking them questions specific to their department. Even though the CAO was copied on the email, it was a communication directed to staff; which is prohibited by the Council resolution.

The Member’s emails also contained direction to staff (demands for answers) that was not filtered through the CAO as required by section 19.4.

The CAO attempted to steer the Member back to communicating only with the CAO in certain emails. This prompted the Member to characterize the direction of Council as “egregious”, “unsupported”, “unwarranted” and to state that Council’s motivation in enacting the communication direction was to take away the Member’s dignity and prevent them from executing their duties as a councillor.

In an email dated July 30, 2025, copied to a member of the public, the Member stated:

1. the Sanctions referenced [resolution of Council limiting communication and attendance physically at closed sessions] came without Findings following a May 15, 2024, Closed Session held in the tiny boardroom, in which three male members of Council raised their voices in a frightening manner causing me to leave the meeting;
2. the May 16 Sanctions without Findings are the beginning of a pattern of elevated segregation, bullying, character attacks, and other behaviours, even including aggression. ... Strong Mayor Clarke, Council and the Administration are attempting to silence me.

This email came in response to an email from the CAO reminding the Member that she was to communicate only with the CAO and not staff. The CAO also confirmed that staff had responded to the member of the public (copied by the Member in her email) in response to the Member demanding an answer from staff.

In our report dated September 16, 2025, we found that the Member breached the Code of Conduct for using similar language in a Facebook post. The Integrity Commissioner engaged in an analysis at that time to balance the Member's right to freedom of political expression against the stated goal of the Code of Conduct of preserving respect for Council decision-making.

The email of July 30, 2025, accuses members of Council of aggression and improper behaviour. These are serious accusations. When presenting such accusations to a member of the public the obvious inference is that Council's decision is not simply incorrect, but forms part of a "pattern" of egregious conduct. The reference to attempting to silence the Member also raises the inference that Council is engaging in some form of nefarious activity.

The Integrity Commissioner finds that the Member accused Council of improper conduct, imputed an improper purpose for the limits imposed by Council and accused individual members of Council of improper activity. This was not in accordance with the Code of Conduct and deliberately criticized the decision-making process and the motivations for the decision; these statements do not foster respect for Council, or the decision-making process as required by sections 15.13 and 6.1 of the Code of Conduct.

While the Member does not have to agree with all Council decisions, the Member does not have an unfettered right to ignore the Code of Conduct. As we stated in our September 16, 2025, report, had the Member explained the rationale for her disagreement and engaged in a discussion that was respectful, an appropriate balance may have been met. This did not happen in the July 30, 2025, email and therefore the Member's statement was a breach of the Code of Conduct.

The Member's comments to a member of the public went beyond simply disagreeing with a decision and alleged improper personal behaviour of members of Council. The Integrity Commissioner finds that there is limited protection for expression that consists of allegations and accusations where no proof is offered.

Recommendation

The Integrity Commissioner recommends that the Member's remuneration be suspended for a period of 30 days for the breach of Council's communication resolution. In the Integrity Commissioner's view, this was not an inadvertent breach, but rather a deliberate refusal to adhere to the direction of Council.

The Integrity Commissioner recommends that the Member's remuneration be suspended for a period of 30 days for the breach of Sections 5.13 and 6.1. The comments contained in the July 30, 2025, email were more offensive than the comments made by the Member in her June 22, 2025 Facebook video (the subject of our report dated September 16, 2025) and made allegations against individual members of Council that attract a more significant penalty.

Sincerely,

Cunningham, Swan, Carty, Little & Bonham LLP



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