



ADR
CHAMBERS

Integrity Commissioner Office
for Township of Springwater

BENJAMIN M. DRORY

Integrity Commissioner

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June 30, 2026

SENT BY EMAIL TO:

Mr. Jeffrey P. Shankman

On behalf of Mario Giampietri and Geranium Corporation

And to:

Mayor Jennifer Coughlin

And to:

Renée Ainsworth, Acting Chief Administrative Officer/Director of Corporate Services/Acting Clerk – for distribution to all Members of Springwater Township Council

Re: Investigation Report – IC35801-0126

Council Code of Conduct Complaint Respecting Mayor Jennifer Coughlin

This is my report respecting a January 20, 2026 application (the “Complaint”) initiated by Mr. Jeffrey P. Shankman (“Mr. Shankman”), on behalf of his clients Mario Giampietri and Geranium Corporation, against Township of Springwater (“the Township”) Mayor Jennifer Coughlin (“Mayor Coughlin”), pursuant to the Township’s *Code of Conduct for Members of Council, Local Boards and Committees*¹ (the “Code of Conduct”).

I initially reviewed the Complaint pursuant to sections 17.3 through 17.5 of the Code of Conduct’s Complaint Protocol, and following some correspondence determined that it met the threshold to be investigated. On February 6, 2026,

¹ <https://www.springwater.ca/en/township-hall/resources/Documents/Integrity-Commissioner/2021-025-Code-of-Conduct-Council-Local-Boards-Committees-.pdf>

pursuant to section 17.7 of the Complaint Protocol, our Office invited Mayor Coughlin to provide a written response to the Complaint.

Section 17.8 of the Complaint Protocol entitles me to speak to anyone relevant to a Complaint, which I ultimately did with Mr. Giampietri (accompanied by Mr. Shankman), Mayor Coughlin, and six witnesses – including four of the other six Members of Council.

I note at the outset that several instances of language attributed to parties in this Report were arguably impertinent, but I consider it necessary to reflect them as conveyed in order to establish the facts of the matter.

A relatively small portion of the complaint also involves matters that I believe are best characterized as relating to Mayor Coughlin's work as Deputy Warden of Simcoe County (the "County"). I have detailed herein which elements I believe those are, but overall I am satisfied that the majority of the complaint appropriately relates to Mayor Coughlin's role as the Township's Mayor.

The Parties' Positions

Complaint

Mr. Shankman asserted the following in his Complaint letter:

... [W]e are legal counsel to Mario Giampietri and Geranium Corporation, a member of the Midhurst Landowners Group ("MLG"). My clients have ... been made aware of untrue and defamatory comments made by Mayor Coughlin ...

... [W]e hereby apply to you ... to investigate Mayor Coughlin for contraventions of the Township of Springwater Code of Conduct For Members of Council ... (the "Code").

Application Request

We ask that you ... make the appropriate findings ... and further consider the appropriate sanctions and penalties to be recommended and applied ...

Background

Ms. Coughlin sits as the Mayor of the Township and also as the Deputy Warden of Simcoe County. Mayor Coughlin's conduct... occurred within the backdrop of the debate ... during the summer/fall of 2025, over the potential annexation of certain

Springwater lands by Barrie and the extension of cross border servicing into Springwater along the Bayfield corridor.

*... [S]ubstantial presentations were made in the public realm by Geranium and Mario Giampietri ... in respect of the ... County Staff Report presented to County Council during their November 4th Council meeting (the "**Report**"). These supported a position that the subject lands remain within Springwater and that they be serviced by Springwater facilities, which would have the ... capacity to do so.*

The Mayor objected to those Springwater lands being added to the Midhurst Secondary Plan area for residential development within Springwater. She wished to have those lands annexed by Barrie ...

A servicing solution and development within Springwater were presented by my clients ... The positions ... were supported by reports from expert land economists, land use planners and lawyers ... The County's own staff report ... supported those positions.

Mayor Coughlin did not support them. She took the position that the subject ... lands should be annexed to the City of Barrie and ... was determined to make that happen. Ultimately, she did so by employing Strong Mayor Powers.

... [H]er conduct included making inappropriate, defamatory remarks ... such that Councilors, staff and others would be persuaded to question the integrity of Geranium and Mr. Giampietri and hold them in disfavour ...

The Code

... The relevant section is 4. Conduct of Members. It is copied here.

4.1. A Member shall at all times conduct themselves with propriety, decency and respect and ... all members of the public, other Members and staff are to be treated with dignity, courtesy and respect, recognizing that a Member is always a representative of the Township and of their elected office. A Member shall at all times conduct themselves with decorum and in accordance with the Township's Procedural By-law during any meetings and in a manner that demonstrates fairness, respect for individual differences, and an intention to work together for the common good and in furtherance of the public interest.

...

Conduct being the subject matter of these Complaints

It has been reported ... and the undersigned has verified, that Mayor Coughlin made disparaging, derogatory, defamatory statements about our clients in oral conversations ... Those statements included

- *Referring to Geranium, and Mario Giampietri specifically, as “the Mafia”; that “they are the f...ing (abbreviated here, but spoken, in full) Mafia”.*

These statements were intended to convey ... that our clients had the attributes of or were affiliated with a corrupt, organized, criminal enterprise ...

- *Referring to the County Staff Report ... Ms. Coughlin stated that it was “corrupt”; “that the Midhurst Landowners Group (“MLG”) ... wrote that report”; and that “they (meaning MLG ...) “have tentacles everywhere”.*

These statements were intended to convey ... that our clients had infiltrated public services and, in essence, had written the Report (... authored ... by senior County staff), which is favourable to ... our clients. The innuendo and inference are that our clients somehow ... exerted surreptitious and immoral influence on the process ... and that the Report is thereby, “corrupt” and unreliable.

...

- *In reference to the Midhurst Landowners Group ... and/or of Geranium that “they are “broke” and, that “they are going bankrupt”.*

These statements were intended to convey ... that MLG and/or Geranium were financially unstable, or worse, impecunious; with the obvious insinuation that they could not deliver on any past, present or future covenants to finance their projects

...

All of the above statements are untrue. They are meant to be and are damaging to our clients’ reputations and to their integrity.

Contraventions of the Code

*Each of the above statements is in contravention of the Code ... They run afoul of the requirements to act **with propriety, decency and respect and with the***

understanding that all members of the public, other Members and staff are to be treated with dignity, courtesy and respect.

Witnesses

... [W]e are aware of the following individuals who are witnesses and have some first-hand knowledge to share, namely;

*Terry Geddes;
Councilor Philip Fisher;
Councilor Anita Moore; and
County Warden Basil Clarke*

...

I asked Mr. Shankman where Mayor Coughlin made her comments – for example, whether in public, and/or during a formal Council meeting – as this could have impacted jurisdiction. Mr. Shankman replied as follows:

My verification ... consist of my direct conversations with Counsellors (sic) Philip Fisher and Anita Moore.

Additional information has been obtained by way of direct conversations with Mr. Terry Geddes and Mr. Mario Giampietri, each of whom have had first-hand dealings with Mayor Coughlin ...

The statements ... were made in telephone conversations, initiated by Mayor Coughlin, with the Counsellors. I am told that Mayor Coughlin also made some of the derogatory comments in a Springwater Council meeting and elsewhere. ...

RESPONSE

Mayor Coughlin provided her formal Response on February 27, 2026: (**emphasis per original**)

... I understand that Mr. Giampietri disagrees with my decision to support the Framework Agreement with the City of Barrie.

I understand that Mr. Giampietri's consultants and lawyers disagree with the professional opinions of those brought forth through the Provincially Facilitated Process.

The allegations are not consistent with my character. Throughout the entire process ... and the decade I have spent serving Springwater - I have done so with integrity and grace, and respect for the position I hold.

I recall a phone conversation with Terry Geddes - who is a family friend, Uncle Terry, who works with Mr. Giampietri, asking him if the Midhurst Landowners Group was experiencing financial hardship.

*I recall a conversation with Warden Clarke surrounding Option 3 of **CO 2025-297 - City of Barrie Proposed Municipal Boundary Adjustments - Council Position***

I recall one conversation with Councillor Moore with respect to a letter I sent to Minister Flack.

I do not recall any conversation with Councillor Fisher.

I have no record or further recollection of the noted allegations.

I hope the below links are of asset ...

Mayor Coughlin provided various supporting documents and weblinks. Most notably, she wrote the following lengthy letter to the provincial Minister of Municipal Affairs and Housing (the “Minister”) on December 11, 2025 – which sets out a significant amount of contextual background relevant to what took place.

December 11, 2025

*Hon. Rob Flack
Minister of Municipal Affairs and Housing
...*

Dear Minister Flack,

On December 3, 2025, my office received a Statement of Account from Loopstra Nixon LLP (Loopstra Nixon) for services related to the “Barrie Annexation Discussion,” covering work up to and including November 26, 2025.

... I noted several entries that raise concern. Specifically, the account includes

charges for ... conversations between individual Members of Council and representatives of Loopstra Nixon. These entries appear inconsistent with our engagement protocol and were not directed or approved by our Chief Administrative Officer.

The following sets out the chronology of events ... on which I now seek your guidance.

November 5, 2025 - Closed session ... with topic: "Legal Advice regarding the Legislative Authority of the Minister to Implement the Barrie Annexation Proposal" ... Loopstra Nixon presented the opinion ... and Council directed that the opinion be made public.

November 5, 2025 Regular meeting of Council, a report was presented ... The motion ... was as follows:

C440-2025

That the report from Township Senior Staff regarding the City of Barrie Final Boundary Adjustment ... be received; and,

Option 1

That Council ... accepts the City of Barrie's Boundary Adjustment proposal as presented and inform the Minister of Municipal Affairs and Housing of its decision; ...

Or

Option 2

That Council ... rejects the City of Barrie's Boundary Adjustment Proposal ... and inform the Minister ... of its decision.

Councillor Moore ... had a motion without notice ... Councillor Moore's motion was ... ultimately supported by Council. The motion is listed below:

C443-2025

That the Minister be requested to review and consider the Map on Schedule A to the Boundary Adjustment Agreement ... delineating the lands to be annexed ... is modified to reflect those parcels ... shown ...; and,

That the MZO Lands ... are serviced by Springwater and the Framework

Agreement be modified to remove the reference to cross border servicing found in section 1.3 and 6.4; and,

That the Minister ... be informed of its decision.

... [S]taff advised that option 1 of the deferred motion (to approve the boundary adjustment agreement) was no longer appropriate as it was in direct conflict ... Council voted in favour of option 2, to reject the framework agreement ...

C444-2025

...

That Council for the Township of Springwater rejects the City of Barrie's Boundary Adjustment Proposal as presented and inform the Minister ...

... I introduced a by-law, under the authority of Strong Mayors Powers, to approve the framework agreement and authorize its execution. ... I read ... my reasons ... and advised that it would be amended to include a clause "notwithstanding any previous decisions of Council".

C445-2025

That the mayor's by-law to ... execute the boundary adjustment/restructuring proposal ... as presented be signed and sealed by the Mayor and Clerk, as amended to add ... "Notwithstanding any previous resolutions ... this by-law shall take precedence".

... [T]he by-law was passed. ... rendering ... authorizing the execution of the boundary adjustment/restructuring proposal as the standing direction ...

Councillor Fisher ... had a motion without notice ... After debate, this motion was supported by Council. ...

C446-2025

That Council direct Loopstra Nixon LLP to challenge the validity of the impugned by-law and ... to take any and all courses of legal action that, in the opinion of the solicitor, are required to have the matter resolved, including for example an application to the courts to quash the impugned by-law on the basis of illegality or an application for judicial review; and,

That Council direct Loopstra Nixon LLP to seek an injunction to restrain

the municipality (and any other party) from acting upon the impugned by-law ... until the matter is determined by the courts ...

On November 7, 2025, I issued a Mayoral Decision MD-2025-005 to Veto the above.

... [T]he Deputy CAO advised Loopstra Nixon ...

November 8, 2025, I issued Mayoral Direction MDIR-2025-005 to direct Township staff to engage legal Council and provide notice to Loopstra Nixon.

On November 8, 2025, the Deputy CAO advised Loopstra Nixon ... confirming cessation of its engagement effective 12:15 p.m. on November 7, 2025, directing the firm to cease all work immediately, and clarifying that the Township ... will not be responsible for any costs incurred on or after that time.

Within the Statement of Account, the Township was billed for:

- *November 8, 2025 – resolution strategy*
- *November 9, 2025 – ... drafting and preparing resolution of Council*
- *November 9, 2025 – telephone conversation with “Township people” to review press reports*
- *November 9, 2025 – revisions to resolution ...*
- *November 10, 2025 – telephone conference with Councillor ...*

On November 10, 2025 ... I received notification of ... a majority of members of Council calling for a Special Meeting of Council to be held ... at 6:30 p.m. ...

... Councillor Fisher tabled a motion to ... commence legal proceedings relating to the use of Strong Mayor Powers ... Councillor Fisher’s motion was ... ultimately supported ... The motion is listed below:

C452-2025

WHEREAS on May 7, 2025, the Mayor ... exercised the Strong Mayor Powers ... authorizing the Mayor to engage in discussions with the City of Barrie and the Province of Ontario with respect to the City of Barrie’s Boundary Proposal;

AND WHEREAS on September 3, 2025, ... By-law 2025-068 was passed authorizing the Mayor to include cross-border servicing for the Bayfield Street corridor in the discussions ...;

AND WHEREAS ... Council authorized the retainer of Loopstra Nixon LLP ... on May 21, 2025 ...;

AND WHEREAS ... Council authorized Loopstra Nixon LLP to challenge the validity of By-law 2025-093 ... by Resolution dated November 5, 2025, and provided a broad range of authority to the solicitor to take any and all courses of legal action ...;

AND WHEREAS ... Council further authorized Loopstra Nixon LLP to seek an injunction to restrain the municipality ... from acting upon the Impugned By-law unless and until the matter is determined by the Courts ...;

AND WHEREAS the Mayor ... purported to veto Confirmatory By-law 2025-091, in an attempt to veto Resolution dated November 5, 2025;

AND WHEREAS the veto is of no force or effect because the direction of Council was by Resolution ... and the Mayor can only veto by-laws in accordance with section 284.11 of the Municipal Act, 2001...;

AND WHEREAS the Mayor issued Mayoral Direction MDIR-2025-005 on November 8, 2025, purporting to ... issue written notice to Loopstra Nixon LLP confirming cessation of its engagement effective ... November 7 ... and clarifying that the Township ... will not be responsible for any costs incurred by Loopstra Nixon LLP on or after that time;

AND WHEREAS Mayor Direction MDIR-2025-005 is of no force or effect because Loopstra Nixon LLP was retained by Council, and not the Mayor;

AND WHEREAS the Mayor is acting to completely stop Council from taking any actions, including getting legal advice ...;

AND WHEREAS there is a dispute about the legality and validity of the Mayor's acts ...;

AND WHEREAS the underlying acts ... are material and fundamental and go to ... the very composition of ... what lands are in the Township;

AND WHEREAS the Mayor is taking all steps possible to not have any of

these issues determined by the Court, or any independent body;

AND WHEREAS the determination of who can validly and legally act on behalf of the Township ... is a matter connected to the good government of the municipality;

NOW THEREFORE BE IT RESOLVED THAT:

- 1. Council ... hereby confirms that Loopstra Nixon LLP was retained on May 21, 2025, and remains retained to represent the Township ... in all matters relating to the City of Barrie Boundary Proposal ... including the judicial inquiry provided for ... Council further confirms and, to the extent necessary, reappoints Loopstra Nixon LLP to continue carrying out the directions ... in all Council resolutions, notwithstanding any purported Mayoral Directions to the contrary;*
- 2. The Mayor's Strong Mayor By-laws are of no effect because they do not carry out the provincial priorities and because the ... absence of a direct connection to residential development in the Township renders the proposal outside the scope of these priorities.*
- 3. The veto ... and Mayoral Direction MDIR-2025-005 are of no force and effect, because:*
 - a. Resolution dated November 5 2025 ... was passed by Council and does not constitute a by-law subject to veto under section 284.11 of the Municipal Act, 2001.*
 - b. The Mayor's authority to veto is limited to by-laws that, in the Mayor's opinion, interfere with prescribed provincial priorities, and does not extend to resolutions ... regarding the retention of external legal counsel.*
 - c. ... Mayoral Direction MDIR-2025-005 purporting to terminate the engagement of Loopstra Nixon LLP is ultra vires ... as the power to retain and direct external legal counsel resides with Council and not the Mayor.*
- 4. Council's previous directions to Loopstra Nixon LLP ...*

stands, and ... includes ... unless the lawyer determines that only one or none shall occur:

- a. Bringing an application to quash the Impugned By-law forthwith ...;*
- b. Seeking a statutory injunction ... to prevent anything being done under the Impugned By-law until the application is disposed of.*

5. That a judge of the Superior Court of Justice is hereby requested to conduct an inquiry pursuant to section 274(1) of the Municipal Act, 2001... connected with the good government of the municipality, and in particular the following questions ...:

- a. What ... procedures should the Township adopt to resolve disputes between a majority of Council and the Mayor about the appropriate use of the Mayor's powers ...?*
- b. What process should the Township follow to resolve ...:*
 - i. Was the Mayor's exercise of her powers ... valid?*
 - ii. ... Does the Mayor's veto ... have any legal effect on Resolution dated November 5, 2025?*
 - iii. Was Mayoral direction MDIR-2025-005 ... to attempt to end the retainer of ... Loopstra Nixon LLP ... valid?*
- c. ...*
- d. How should municipalities act in the future when similar issues arise ...*

... [A]t 9:02 pm (13 minutes after the meeting was adjourned) the CAO and Deputy CAO were included in an email from Loopstra Nixon, addressed to The Honourable Chief Justice Geoffrey B. Morawetz, with a request to appoint a Judicial Inquiry and included Councillor Fisher's above motion.

...

November 12, 2025, I issued Mayoral Decision MD-2025-006. A decision to Veto a by-law ... in part as it applies to Resolution C452-2025.

November 12, 2025, Council convened a Special Meeting ... Once budget deliberations were complete ... Councillor Alexander ... tabled the following motion, which was supported ...

C458-2025

Whereas on 2 occasions, the Mayor has purported to veto council decisions ...;

...

Whereas the Mayors veto did not have the effect of vetoing the resolutions ...; and,

... [T]he official position of Springwater Council remains and continues to be:

A) Springwater Council opposes the Barrie framework proposal but supports the Moore motion of Nov 05/2025

B) Springwater will proceed with the court actions to quash the Mayors Strong Mayors Bylaws and proceed with the judicial inquiry

C) Loopstra Nixon continues to be Council for the Township of Springwater ...

D) And that the provincial facilitator and Ministry of Municipal Affairs and Housing be advised of the foregoing

... Councillor Garwood tabled the following motion, which was supported by Council:

C459-2025

... Council hereby directs that a chronology of events/decisions, along with all legal correspondence/opinions received ... since November 5, 2025, along with any decisions/uses of strong mayors powers ... since May 1, 2025,

regarding the ... matter be sent to the Minister ... advising the Township has exhausted procedural advice and legal resources ... seeking guidance and advice from the Province.

...

November 13, 2025, I issued Mayoral Decision MD-2025-007 to Veto ... in part as it applies to Resolution C458-2025

...

November 21, 2025, Loopstra Nixon corresponded with Township staff ... re the Judicial Inquiry request ... that Chief Justice Morawetz would not consider the request.

...

Thank you for your time ...

Your guidance on the appropriate avenues for next steps would be greatly appreciated.

Respectfully,

...

Cc: Hon. Doug Downey, Attorney General, MPP Barrie-Springwater-Oro-Medonte

Dan Mathieson, Chair, Provincial Land & Development Facilitator

Paul Dubé – Ombudsman ...

Mayor Coughlin additionally provided a link to the Agenda for the County's November 4, 2025 Special Council Meeting ("Proposed Municipal Boundary Adjustments"),² and provided a link to a June 2025 CBC audiocast she participated in³ – which its website described as follows:

² Agenda – November 4, 2025 Special Council Meeting

<https://simcoe.civicweb.net/Portal/MeetingInformation.aspx?Org=Cal&Id=1095>

³ "Springwater Mayor Signals Support for Barrie Annexation Deal" – CBC Listen – Ontario Morning with Ramrajh Sharvendiran (June 16, 2025) <https://www.cbc.ca/listen/live-radio/1-112-ontario-morning/clip/16152674-springwater-mayor-signals-support-barrie-annexation-deal>

June 16, 2025

Springwater Mayor Jennifer Coughlin says she's strongly in favour of negotiating a deal with Barrie over a potential annexation, even though her council voted against it. She joins us to explain why she used her strong mayor powers to open talks, how it could benefit Springwater, and how she plans to move the conversation forward.

REPLY

Mr. Shankman provided a short Reply on March 2, 2026:

... The response ... provided by Mayor Coughlin is, at best, non-responsive to the ... allegations she faces and, otherwise, evasive. ... [T]he ... letter to Minister Flack and the contents of the links add nothing of relevance to the issues and specific allegations. They appear to be offered as distractions.

Mayor Coughlin has not denied any of the specific allegations of inappropriate conduct which we presented. ...

INVESTIGATION

Interviews

Mario Giampietri

I began by speaking with the Complainant (Mr. Giampietri), together with Mr. Shankman. Mr. Giampietri conveyed that Councillor Moore told him Mayor Coughlin made remarks in the public hallway behind Council Chambers about him “running a criminal organization named the mafia.” He said he found out during a conference call with Councillor Moore and Cheryl Shindruk (his company’s Executive Vice President) on Saturday morning, December 13, 2025, while they were going over the public record respecting the annexation process to ensure all publicly available information was accurate, including their reports to Council. Mr. Giampietri said Councillor Moore was reluctant to reveal Mayor Coughlin’s words because they were so hurtful, and it had really upset him knowing his proud heritage. Mr. Giampietri said he also understood Mayor Coughlin went on a rant about him during a separate late-night call.

Mr. Giampietri described that Midhurst Landowner's Group's ("MLG") landholdings are east and west of Bayfield Street. Anita Moore is the councillor to the east, and Philip Fisher is the councillor to the west, and those lands represent the Midhurst Secondary Plan ("MSP"), which Geranium Corporation is administering for MLG.⁴ He said Councillors Fisher and Moore are critical to the servicing schemes because if there are MSP issues, their first point of contact is the local councillors, who understand the broader community impacts of what MLG is building.

Mr. Giampietri said Councillor Fisher also reluctantly confirmed to him what Councillor Moore described – and when he asked why the councillors hadn't let him know sooner, they replied that knowing how sensitive he was about his heritage, they thought it'd be too upsetting to tell him, and there was even more the councillors wouldn't tell him.

I asked Mr. Giampietri to describe how the comments affected him. He said he was stunned and overwhelmed that he would be called the "mafia" after having been in Canada for 68 years. He elaborated that his parents landed at Pier 26 in Halifax in 1956, and he didn't speak English; he was called "D.P." in school, which he originally thought was a nickname, but he later found out it meant "displaced person", which he couldn't get over – his classmates whom he thought were being friendly were mocking him for his heritage. He said he pronounces his first name a certain way to honour his father's legacy, and now Mayor Coughlin's comments were mocking his heritage for his last name.

Mr. Giampietri said County Warden Basil Clarke told him he heard Mayor Coughlin say MLG was bankrupt several times and advised her it was uncalled for and not to say it. Mr. Giampietri opined that since MLG are municipal partners developing the MSP, Mayor Coughlin should be doing everything she could to help MLG, rather than belittle them.

Mr. Giampietri added that Terry Geddes has been working with his company for 28 years and was previously Mayor of Collingwood and County Warden. He said Mr. Geddes helps navigate dealing with municipalities and the County during an

⁴ See <https://www.springwater.ca/business-development/current-development/#:~:text=The%20Midhurst%20Secondary%20Plan%20guides,environmental%20considerations%20and%20other%20impacts>.

instable time, and is well-known to Mayor Coughlin. He said Mr. Geddes stated during a meeting with Mayor Coughlin, Ms. Shindruk, and Councillor Thompson that MLG weren't going bankrupt and it was misleading for anyone to say so. He said there were several meetings among them, most recently on March 2, 2026.

I asked Mr. Giampietri to describe his organizations. He replied that MLG is a group of developers that own land – it's a typical cost-sharing agreement whereby like-minded developers form a venture to liaise with the municipality, and fund services that the municipality eventually takes over but doesn't have funds to build immediately. He said the venture appoints a manager for planning, developing, and servicing affairs – in this case Geranium Company ("Geranium") – for which he is the CEO, and together with Ms. Shindruk they are the front-people for all dealings with the Township, so comments affecting Geranium also affect MLG.

Mr. Giampietri said Mayor Coughlin stated upon being elected in October 2022 that she was excited about a boundary adjustment (i.e., Barrie's annexation of Springwater and Oro-Medonte lands). However, he said MLG's position was to protect the watershed and servicing area of the lands adjacent to the MSP, and emphasized that increased participants create the best opportunity for MLG to lower their cost per member. He said there was a unanimous Council resolution on February 5, 2025 asking MLG about the viability of servicing additional lands through the MSP – which he said started a whole process of reports supporting that they could be serviced from Midhurst, and therefore didn't need Barrie to acquire them. However, he said Mayor Coughlin used Strong Mayor powers to do the opposite – which MLG has challenged, and a law firm has initiated a court challenge against Mayor Coughlin's use of Strong Mayor powers.

Mr. Shankman added that Mayor Coughlin inappropriately disparaged MLG to Members of Council, which he believed was intended to sway other councillors to adopt her position against MLG. Mr. Giampietri interjected that he was particularly incensed by Mayor Coughlin's comment that MLG "infiltrated County staff," and noted that Mayor Coughlin successfully got County Council to not support its own staff's report. Mr. Shankman said Councillor Moore referenced the County Staff Report during a Township meeting, so the County Report was also relevant to the Township and it was all co-mingled.

Mr. Giampietri concluded that he had never experienced anything like this in 40 years in business, despite working with some very contentious applications. He disputed Mayor Coughlin's inability to remember her conversation with Councillor Fisher, and disputed her statement that the allegations were inconsistent with her character.

After our discussion, Mr. Shankman forwarded me the February 5, 2025 Council resolution:⁵

C061-2025

...

Whereas in September 2023, the Mayor of the City of Barrie presented a proposal to Springwater Council regarding a proposed boundary adjustment; and,

Whereas in September 2024 Hemson Consulting was jointly engaged by the City of Barrie, County of Simcoe, Township of Springwater and Township of Oro-Medonte to undertake a "Joint Land Needs Analysis and Study"; and,

Whereas the "Joint Land Needs Analysis and Study" ... confirmed that ... housing growth in Springwater's Midhurst Secondary Plan area may necessitate the expedited designation of additional employment lands to maintain balanced community development; and,

Whereas all the objectives of the "Joint Land Needs Analysis and Study" can be achieved if Springwater, rather than Barrie, were to approve the proposed annexation lands for both residential and employment purposes; and,

...

Whereas on December 11, 2024, the City of Barrie passed a motion that there will be no servicing provided to the subject neighbouring municipalities without a boundary adjustment; ...

...

⁵ Item 11.2 – Notice of Motion regarding Future Residential/Community Uses and Employment Lands in Springwater (February 5, 2025) <https://springwater.civicweb.net/document/245025/>

That staff report back with the confirmed capacity of Ultimate Treatment Facility, to verify Springwater's ability independently to service the identified study area lands and the potential settlement area expansion; and,

That staff report back ... on the status of the Growth Management Study ... and direct WSP to ... expedite the ... study to include the Midhurst Settlement Area expansion over to Hwy 400 with an update to Council no later than June 2025.

Carried

Mr. Shankman also provided two pieces of correspondence that MLG sent to Township Council. Daniel Steinberg, A.S.O. wrote on February 19, 2025:

Dear Mayor Coughlin and Township Council,

Re: Council Resolution, February 5, 2025

I am writing on behalf of the Midhurst Landowners Group ("MLG") in relation to the Resolution passed unanimously ... on February 5, 2025, regarding the potential expansion of the Midhurst Secondary Plan area, including lands to the east of Midhurst along the Highway 400 corridor.

The MLG is supportive of this initiative and will work cooperatively with Council and Staff at the Township ... and the County ... together with ... other stakeholders to achieve Council's goals. In particular, the MLG is committed to servicing the Midhurst Settlement Area expansion lands by utilizing the existing and planned water, wastewater, and road infrastructure that the MLG has already constructed and will continue to construct per the approved Class Environmental Assessment.

The MLG will work with Township Staff to prepare ... the necessary studies to demonstrate serviceability of the proposed expansion lands ... This includes determining how water and wastewater infrastructure ... can be designed to accommodate the proposed Midhurst Secondary Plan expansion lands.

The MLG looks forward to working with the Township on this exciting initiative that is poised to generate thousands of jobs and economic activity ...

Yours truly,
MIDHURST LANDOWNERS GROUP INC.

Mr. Steinberg additionally sent Council 145 pages of reports and documentation with a letter of May 15, 2025, supporting their position.

Warden Basil Clarke

I spoke with Basil Clarke, the Warden for Simcoe County. He confirmed knowing Mr. Giampietri and said he has met most developers across Simcoe County personally. He noted that Geranium Corporation was probably among the two local developers he had met the most frequently, particularly with Mr. Giampietri and 'Cheryl', along with Terry Geddes, and their discussions were typical for subdivisions – for example, Geranium asked the County whether they'd be interested in working with them respecting their sewage system.

I asked if Warden Clarke had heard Mayor Coughlin make comments about any of Mr. Giampietri, Geranium Corporation, or MLG recently that he might have considered in questionable taste. He said he hadn't heard Mayor Coughlin speak about Mr. Giampietri, but did hear her say MLG was bankrupt – to which he told her privately, "Jenny, you've got to stop spreading rumours like that – I don't believe they are, but if they were they're the biggest developers in our County and you've got to try to prevent that." He said Mayor Coughlin is his Deputy Warden, and he corrected her because he didn't think it was right for her to be saying that.

Warden Clarke confirmed hearing rumours that Mayor Coughlin had said MLG improperly influenced a County staff report – which he disagreed with. He said he and the County's CAO confronted Mayor Coughlin about it, but she denied making the comments, and said she merely thought staff had "cut-and-pasted from the other Report." Warden Clarke said he cautioned Mayor Coughlin that it would have been highly improper for her to make those comments, because the Report was from County staff.

Warden Clarke said he had never heard about Mayor Coughlin commenting to the effect that MLG or Geranium Corporation were the "fucking mafia" – she never made a comment like that around him, and all he'd heard was that she said

something about County staff. He said it's been a very tough year on all Members of Council regarding the Barrie annexation.

Terry Geddes

I spoke with Terry Geddes, who identified at the outset that he's both a paid consultant for Geranium Corporation, and his daughter married Mayor Coughlin's first cousin about 20 years ago, so they've always had a wonderful family relationship. He said he was disappointed in the whole affair and would like to see things get cleared up. Mr. Geddes added that he was previously the Mayor of Collingwood for nine years, a councillor there for three years, and was also previously the Warden of Simcoe County.

Mr. Geddes said he has known Mr. Giampietri for nearly 30 years, since his time as Mayor of Collingwood – they are professional colleagues and friends, and he does government relations work for Geranium Corporation in the Simcoe County area. I asked if Mr. Geddes had heard Mayor Coughlin make questionable remarks about either Mr. Giampietri, MLG, or Geranium. He said he wouldn't have considered anything in questionable taste, and he and Mayor Coughlin have a good relationship – she calls him 'Uncle Terry' and regularly contacts him for advice or thoughts. He said Mayor Coughlin called him one evening around early-November 2025 and asked if Geranium and MLG were bankrupt – to which he replied absolutely not and walked her through the depth of their financial strengths. He added that Mayor Coughlin and Councillor Thompson called two meetings involving him, Mr. Giampietri, Councillor Garwood, Ms. Shindruk, Vimal Patel (Geranium's Director of Engineering), and Mayor Coughlin's Executive Assistant – the first was around January 2026, and the second was on March 2. Mr. Geddes said he reinforced MLG's financial strength at those meetings, and he felt the bigger question was who would have told Mayor Coughlin they had financial difficulties to begin with. He said Mayor Coughlin never asserted that Geranium was bankrupt, and he told her he believed they absolutely weren't and that the rumours were false.

I asked if Mr. Geddes had heard Mayor Coughlin comment to the effect that MLG had improperly influenced a staff report at Simcoe County. He said he heard rumours about it throughout the industry, but Mayor Coughlin never made that statement to him, and during his discussions with her he probably explained that Simcoe County staff are impeccable, because he worked with them for years as

Warden and also interacted with them through other municipalities – so he was confident Simcoe County staff are among the most ethical and hard-working municipal staffs in Ontario.

Finally, I asked if Mr. Geddes had any knowledge about Mayor Coughlin literally commenting that Mr. Giampietri and/or Geranium Corporation were the “fucking mafia.” He replied that he had no personal awareness of it, but again had heard rumours about it throughout the industry. However, he added that Mr. Giampietri was “absolutely devastated” when he heard about it, and it “destroyed” him because he has very strong feelings about his heritage and that word.

Mr. Geddes said the essence of the situation is that Mayor Coughlin and MLG were very committed to moving the Township forward, but something caused the relationship to be badly hurt, which really disappointed him. He felt there’s no place for animosity, and everybody should get in one room and discuss the problems and move on.

Councillor Anita Moore

I spoke with Councillor Moore, who said she has known of Geranium Corporation for eight years – they’re part of a large development, and her relationship with them is strictly business. Councillor Moore said MLG’s development started in her ward (Ward 4), but it now extends into Ward 5. She said MLG was instrumental in creating the MSP, and they also work on other developments and in recent years opened a presentation centre and a model home.

I asked if Councillor Moore had heard Mayor Coughlin make any arguably questionable comments about Geranium Corporation, MLG, and/or Mr. Giampietri in recent months. She replied “yes” and elaborated that she had heard so on two different occasions. She referred to some contemporaneous notes she took on point.

Councillor Moore said she asked to meet with Mayor Coughlin on November 10, 2025 after a heated Council meeting – she said Mayor Coughlin was very upset, yelling and crying in the hallway. Councillor Moore said she’s been a registered nurse for 30 years, so she was concerned about Mayor Coughlin and followed her into her office. Councillor Garwood was also there. Councillor Moore said she told

Mayor Coughlin she was concerned about her health – to which Mayor Coughlin replied she had been in the hospital for anxiety attacks and other reasons, and then said, “there’s no fucking way that Phil wrote that motion.” Councillor Moore replied she had no idea who wrote it, to which Mayor Coughlin replied it was Loopstra Nixon – so she asked if Mayor Coughlin thought Loopstra Nixon was corrupt. Mayor Coughlin put her hand over her mouth and said she couldn’t say that, and Councillor Moore reminded her there was an ethical screen in place. She described to me that Loopstra Nixon had indicated earlier in the year that they were also doing work for MLG, so a common ethical screen was in place to prevent the two from mixing. Councillor Moore said Mayor Coughlin replied, “it’s Geranium and fucking MLG – they have tentacles”, and in doing so motioned her hand along the table like a spider, while saying “they sorta infiltrate everything like an octopus.” Councillor Moore said she moved on, but Mayor Coughlin then said, “it was like the Report on the County Agenda.” Councillor Moore said she herself used information straight from the County’s Report in the Township’s November 5 annexation vote, so she asked what Mayor Coughlin meant – to which Mayor Coughlin replied, “they didn’t write that” and “it wasn’t even authored.” Councillor Moore said she didn’t really ask Mayor Coughlin for elaboration, and then asked Mayor Coughlin something like, “Is this worth it? It’s taking a toll on your health.”

Councillor Moore said she heard things a second time during a phone call with Mayor Coughlin, on December 11, 2025 – which she said was a much longer conversation, lasting about two hours. She said Mayor Coughlin had written a long letter to Minister Flack that day,⁶ which complained about Loopstra Nixon, outlined motions from councillors, and described her use of Strong Mayor powers. She said councillors received Mayor Coughlin’s letter at 2:05 pm, and then she received an interview request at 4:50 pm from a local reporter (Wayne Doyle). She told Mr. Doyle she didn’t have direct conversations with Loopstra Nixon outside of Council Chambers.

Councillor Moore said Mayor Coughlin called her later and asked if she’d seen the letter and heard from Mr. Doyle – which she confirmed on both points. Mayor

⁶ The letter from Mayor Coughlin to Hon. Rob Flack (Minister of Municipal Affairs and Housing) – December 11, 2025: <https://www.springwater.ca/media/0zca5xkr/2025-12-11-mayor-letter-to-minister-flack-re-loopstra-nixon-statement-strong-mayor-powers-veteos-etc.pdf>

Coughlin was upset, and told her “Well, I spent the last three weeks working on the wording of that letter, and it’s out of my hands and I’m fucking done – I’m done with all of this, and they can take it from here – this is huge, much bigger than me, they can deal with it all.” Councillor Moore told me she didn’t know what Mayor Coughlin meant, but responded that the majority of her motion referenced in the letter was taken from the County Report – to which Mayor Coughlin replied, “you know that Report wasn’t written by County staff?” Councillor Moore said she didn’t know that, to which Mayor Coughlin replied, “bullshit, I know you’re lying” – and Councillor Moore could hear a male laugh in the background, whom she assumed was Mayor Coughlin’s husband.

Councillor Moore told me the County Report said, “Planning Department” and was prepared by its General Manager (Rob Elliott), so she didn’t know what Mayor Coughlin meant. They got into a heated debate, and she asked Mayor Coughlin to explain herself, since she didn’t know how the County’s Report could have gotten on its Agenda if County staff hadn’t supported it. She added that she sits as an Alternate Councillor on County Council, so she’s familiar with their reports, and nothing gets on their Agenda without being passed by several people. Councillor Moore said Mayor Coughlin told her “you know the fucking MLG wrote that”, which upset Councillor Moore – she said she wholeheartedly agreed with the Report’s Option 3, which would have led to water and wastewater servicing from within the Township, which she supported all along, and County staff and the Township’s lawyer also recommended.

Councillor Moore said Mayor Coughlin told her, “it’s fucking corrupt” (i.e., the County Report), and said she spent about 70 hours calling every County councillor getting their “decision” reversed – which Councillor Moore clarified wasn’t actually a decision, but rather a staff recommendation. Councillor Moore said she added Option 3 from the County Report to the Township’s Agenda, as a compromise she’d support. She elaborated that she presented part of the County’s Report as an option for the Township themselves. She said the Township, the County, the City of Barrie, and the Township of Oro-Medonte were all involved, and she agreed with the position of the County, the Township’s lawyer, and MLG – so she had no idea what Mayor Coughlin was talking about.

Councillor Moore said the call calmed down a bit, but then Mayor Coughlin mentioned “the MLG have tentacles” and “they reach everywhere with this

Planning report,” and “there are people who don’t want to work with MLG because they are going bankrupt” – i.e., referencing other developers she’d spoken with – “because they’re the fucking mafia, and you guys have invited them into our Chambers, which is just fucking gross.” Councillor Moore asked how Mayor Coughlin knew about the bankruptcy, to which she replied “Mike Rice”, who Councillor Moore said she had never heard of, but reiterated to Mayor Coughlin that the Township didn’t create the legislation which says they must work with MLG for the MSP – but Mayor Coughlin replied, “they’re the fucking mafia and it’s just fucking gross.” Councillor Moore told me the legislation dated back to about 2009, which long predated both her and most Township staff, and only Geranium knew MLG’s entire history.

Councillor Moore said she then asked Mayor Coughlin about the HEWS funding⁷ – which was \$35 million the Township received for MLG’s water treatment facility, that MLG has invested into significantly and also facilitated the grant application. She said Mayor Coughlin replied she didn’t “want to give them the money for the ‘double-wide trailer’, and preferred it spread over different facilities, but the Ministry rejected that and said it was only to go that one facility.” Councillor Moore thought Mayor Coughlin’s “double-wide trailer” wording was disparaging for a state-of-the-art facility – it had changed from original plans but was under development and from a tour she took seemed impressive.

Councillor Moore summarized that on November 10 and December 11, Mayor Coughlin asserted that MLG and Geranium were both corrupt, the County was corrupt, and Loopstra Nixon and Township Council were corrupt – so everyone was corrupt in her world. She added that MLG have been in the Township for a long time and have been a good partner – they provided engineering, consultant, and legal opinions, and the Township’s consultants said the most cost-effective way to develop Bayfield St. would be to let MLG further their development already under construction, but Mayor Coughlin still wanted otherwise. Councillor Moore said the entire phone call made her very upset because the Township has been working with MLG for 20 years.

Councillor Moore said Mayor Coughlin was visibly upset during a separate November 10 interaction in the hallway behind the Council Chambers. Councillor

⁷ Housing-Enabling Water Systems:

<https://news.ontario.ca/en/backgrounder/1005648/housing-enabling-water-systems-fund-projects>

Fisher had just read a long motion, and Mayor Coughlin called a recess and went out to the hallway inconsolable. Councillor Moore said the Township's CAO and Deputy CAO were standing there, and Mayor Coughlin was motioning towards Council Chambers saying, "that's corrupt", and referencing Councillor Fisher's motion. Councillor Moore asked Mayor Coughlin what she wanted to do about it, to which Mayor Coughlin reiterated that Councillor Fisher hadn't written the motion (i.e., implying Loopstra Nixon wrote it.)

Councillor Moore said the majority of Council had petitioned the November 10 Special Meeting, after the Township issued notice to Loopstra Nixon ostensibly terminating them on November 8. She said Loopstra Nixon wrote back saying they didn't recognize the dismissal and would continue working for Council – and then Councillor Fisher put forward his motion for judicial review, which was supported. Councillor Moore said Mayor Coughlin was yelling and screaming in the hallway, saying it was corrupt.

Councillor Moore said she found the entire process exhausting and was unsure why she hadn't filed her own complaint, since Mayor Coughlin called her a liar and essentially corrupt. She said she called Ms. Shindruk that Saturday morning (December 13, 2025) and described what they were being accused of – i.e., that "MLG wrote the County Report and she knew it." She asked Ms. Shindruk flat-out if MLG wrote the Report, which upset Ms. Shindruk, who replied "absolutely not, we have nothing to do with it."

I asked if Councillor Moore thought Mr. Giampietri might have been particularly impacted by the rumours about what Mayor Coughlin said. She said she could only speculate it would upset him because he always seemed concerned about his image in the community– he's the front-facing person for Geranium and MLG, and she didn't think she would recognize anyone else from Geranium beside him and Ms. Shindruk. She said MLG are the Township's largest developer, and they have contributed to its fundraisers and sports teams, and are always the Township's top sponsor and looking to give back to the community, so she felt this was such a genuinely undeserved insult to Mr. Giampietri.

After our call, Councillor Moore sent me a link to Simcoe County's November 4, 2025 Report.⁸ The Report identified that it was written by the Planning

⁸ CO-2025-297 – City of Barrie Proposed Municipal Boundary Adjustments – Council Position:

Department of the Engineering, Planning and Environment Division, and was prepared by Rob Elliott (General Manager, Engineering, Planning & Environment) and approved by Trevor Wilcox (General Manager, Corporate Performance). They identified the following options for County Council within the Report: (emphasis per original)

Options

Staff has provided a professional evaluation of the ... considerations Council should be aware of in making a decision on whether to support the Restructuring Proposals from the City of Barrie. It is acknowledged that the process and timelines have been Provincial directed and reflects Provincial priorities.

Once Council makes its decision ... the Minister of Municipal Affairs and Housing has the discretion on the subsequent steps ...

... [S]taff suggest County Council has the following options:

Option 1 – Support – County Council supports the City of Barrie's Restructuring Proposals as presented to both the Township of Oro-Medonte and the Township of Springwater in City of Barrie By-law 2025-111.

Option 2 – Do Not Support – County Council does not support the City of Barrie's Restructuring Proposals as presented ...

Option 3 – Support Subject To Conditions – (Recommended by Staff) County Council supports its continued partnership with the Province in building more homes and investing in the regional economy. County Council also respects its partnership with the City of Barrie in delivering services to our collective residents and businesses, with a desire of maintaining opportunities for collaboration that foster mutual growth and prosperity. Therefore, the County of Simcoe supports a boundary adjustment by the City of Barrie as outlined on Schedule 3 which removes the Highway 400/11 employment lands and provides for an area of Community lands that satisfies housing needs to 2051. It is understood by County staff that the lands along Bayfield Street which are known as the Sadlon and Remington lands will remain in Springwater and will be provided water and wastewater services

from within Springwater. It is further noted that the County is seeking no compensation from the City of Barrie under option 3. It is beyond reasonable in supporting the annexation of approximately 400Ha of developable land for community purposes and asking for nothing in return from the City of Barrie.

Councillor Philip Fisher

I spoke with Councillor Fisher and began by asking how he interacts with Mr. Giampietri and Geranium Corporation. He said Geranium is part of MLG, and very active in development in the Township, and he and Councillor Moore have probably had the most Council interactions with MLG since most of MLG's activity is in their wards (Wards 4 and 5). He said his relationship with Geranium was very cordial, and he'd spoken with Mr. Giampietri and his colleagues many times over the years.

Councillor Fisher confirmed having heard questionable comments from Mayor Coughlin respecting Mr. Giampietri, Geranium Corporation, and MLG. He said he's had very little interaction with Mayor Coughlin outside of Council meetings in recent months, but she made inappropriate comments during phone calls with him in 2025. He said Committee meetings about annexation were ongoing, and Mayor Coughlin would often call him late in evenings after meetings, which he felt were meant to gauge his positions and try to garner his vote to favour annexation (which she favoured). Councillor Fisher said Mayor Coughlin spoke negatively about MLG, Geranium Corporation, and especially Mr. Giampietri in one of those conversations – she referred to them as being part of the mafia and having ties to organized crime. Councillor Fisher couldn't remember Mayor Coughlin's exact words, but said she definitely said they are the "mafia" verbatim, and that they were sort of infiltrating and exerting some influence over Council. He said Mayor Coughlin's phone calls tend to be rambling and lengthy, but the part saying they were part of the mafia was pretty clear, which she told him more than once.

Councillor Fisher said he can take a lighthearted joke, but Mayor Coughlin's comment was purposeful – it felt intended to steer his vote by painting MLG and Mr. Giampietri as immoral people he didn't want to associate with. He was sure Mayor Coughlin was trying to place a wedge between MLG and his vote, because MLG was providing evidence that annexation was unfavourable for the Township,

but Mayor Coughlin very much favoured it. He felt it was a kind of lobbying, but which came with trying to hurt MLG's reputation in his view.

Councillor Fisher said Mayor Coughlin's rambling phone calls usually take place late in the evening and can become profanity-laced and increasingly aggressive. He added that he believed there was some intoxication, although he acknowledged he couldn't administer a breathalyzer over the phone. He described that he was on the phone with Mayor Coughlin for 1.5 hours on an unrelated topic in summer 2025 – it began as a normal conversation, where they merely disagreed about the subject; but Mayor Coughlin became aggressive and profane during the second half-hour, and he felt the third half-hour was “unhinged” – “the F-word was profuse, and she also complained about another constituent opposed to annexation.” Councillor Fisher said he cut Mayor Coughlin off at 6:50 pm, because he had to attend a 7:00 pm meeting, but a constituent called him the next day and told him he received a profanity-laced phone call from Mayor Coughlin at 7:00 pm. Councillor Fisher thought it demonstrated a pattern in Mayor Coughlin's behaviour outside of Council Chambers, when she's trying to get her way, which he said was why he doesn't have contact with her, although he suspected Mayor Coughlin has no love for him either.

Councillor Fisher then described another incident from a few years earlier after he questioned something in Council; he said Mayor Coughlin left Council Chambers to wait in her SUV and then approached him afterward in the parking lot while he was talking with a constituent and aggressively asked to speak with him for a moment. He said it became long, uncomfortable, and antagonistic, and eventually he just became subservient and apologized and left. He said in hindsight he should have complained then, but he merely phoned two other councillors to somewhat document it. He felt Mayor Coughlin's comments about MLG, and particularly Mr. Giampietri – i.e., that they were part of the mafia, and he'd be interested to know that and should maybe be wary of them – were meant to dissuade him from believing their information. Councillor Fisher said he is no friend or ally to Mayor Coughlin, and they don't have cordial “how was your weekend?” conversations, so for her to work that hard and phone him was purposeful, because she wouldn't have called him otherwise.

I asked if Councillor Fisher had heard Mayor Coughlin say MLG was broke or bankrupt. He said she didn't use that term to him – during the same conversation as her mafia comments, she spoke about MLG not being well-capitalized – she

didn't say they were "broke" or "bankrupt", but did tell him they weren't as well-heeled as Council might have presumed, as if to cast doubt that MLG would deliver infrastructure as they said they would. He said he also heard that Mayor Coughlin had made similar comments to others about MLG not having funds.

I asked if Councillor Fisher heard Mayor Coughlin comment to the effect that MLG had improperly influenced a Simcoe County staff report. He said he had heard about it, but the comment wasn't made to him directly – although Councillor Moore told him that Mayor Coughlin commented about a motion he brought forward. He described that he introduced a very lengthy, legalistic motion at a November Council meeting, and understood that immediately afterward Mayor Coughlin went into a staff area behind Council Chambers with a sitting area, kitchenette, and washrooms. He said Councillor Moore told him that Mayor Coughlin called his motion "corrupt" – which he interpreted as saying he was corrupt – in front of her, the CAO, and the Deputy CAO, and "she was on the floor" when she said it – i.e., she was so angry she couldn't stand up. Councillor Fisher said Mayor Coughlin makes dramatic performances, and "on the floor" was how it was described to him second-hand.

Councillor Fisher returned to Mayor Coughlin's "mafia" comment and said if it was a light-hearted joke he would have taken it that way – but Mayor Coughlin's comment was intentional, and he doubted she would have made it if Mr. Giampietri had been Polish. He acknowledged he couldn't prove it, but he felt "mafia" fit the Italian stereotype, and if Mr. Giampietri was from Texas then Mayor Coughlin might have alleged he was a cowboy – she seemed to be really leaning into that stereotype and legitimizing it, and the way she said it wasn't a joke. He said he's worked with and observed Mayor Coughlin for some time, and knows when he's being sold, and there was some purpose and intent behind her comment. Then she said it again in a subsequent phone call, although he didn't pursue it any further.

Councillor Fisher reiterated that he felt there's a pattern of behaviour, and Mayor Coughlin believes in anger and intimidation – so she was actually the one sort of behaving like the mafia, by virtue of things she lets happen outside of Council Chambers. He said Mayor Coughlin's husband even came to Council recently and tried intimidating somebody, for which there is now an ongoing OPP investigation. He said it was unsafe and seemed like high school stuff, like "my

boyfriend's going to beat you up" – but he's been subjected to "just an absolute barrage of angry F, F, F" during Mayor Coughlin's phone calls to him. He said he has a pretty thick skin and has run into people with potty mouths, but he wondered if a weaker person would just fear her, and he speculated that maybe it has worked for her in the past. Councillor Fisher reiterated that he couldn't say Mayor Coughlin has been intoxicated on the phone, since he couldn't visually see her, but said he's "not stupid" and he could hear her sipping on the phone. He added that he doubted most people would phone their work colleagues after 10 pm, which was when Mayor Coughlin would open herself and say these things – so he won't take her calls after 9 pm now. He wondered why she feels the need to phone people late at night, aggressively, sipping, and becoming increasingly unhinged. He felt Mayor Coughlin would only call an unaligned councillor out of necessity, and she certainly tried to exert influence behind the scenes over him respecting the annexation, and perhaps she also did it to other councillors and maybe even County councillors. He opined that if Mayor Coughlin was willing to tell him (a non-ally) that MLG and Geranium Corporation were the mafia, then he was pretty sure she'd feel safe saying it to nearly anyone who would listen.

After our call, Councillor Fisher called me back and asked to speak briefly about another point. He remembered that in summer of 2023 or 2024, Mayor Coughlin followed himself, Councillor Moore, and Councillor Alexander to a restaurant on Bayfield St. in Barrie, irate over the topics discussed. He said Councillor Moore identified that this made four Members of Council present, which constituted quorum, but Mayor Coughlin replied "ah, fuck it", and proceeded to sit down and become argumentative over the evening's topic – although Councillor Fisher said they shut her down and told her they weren't discussing it. He said all three of them found it an unhinged event, which he felt spoke to a behavioural pattern – i.e., Mayor Coughlin following councillors uninvited, breaking quorum rules, swearing, and saying she can do anything she wants as if above reproach.

Councillor Matt Garwood

I spoke with Councillor Garwood. He didn't recall Mayor Coughlin making any inappropriate remarks towards MLG, Geranium, or Mr. Giampietri. He knew there has been lots of discussion around MLG's business and how they've operated in the community, but nothing he heard was overly inappropriate.

I asked if Councillor Garwood recalled Mayor Coughlin saying MLG and/or Geranium were broke and/or going bankrupt. He said those weren't the exact words – he recalled informal conversations about MLG's business solvency (as with any community partner), because they were talking about significant community infrastructure MLG was responsible for, and the Township and the Province were also making significant investments to Geranium's facility, so there were conversations about whether MLG could follow through with their original commitments. For example, he said there were conversations asked why MLG was pivoting from their original proposed MSP investments that were negotiated many years earlier; but they weren't negatively focused on Geranium or MLG, nor specifically alleged they were broke – it was more questioning whether MLG could follow through with their commitments, to protect the Township's interests. Councillor Garwood thought Members of Council need to ask those questions of any community partner, especially when involving hundreds of millions of dollars, and the Township was reliant on the outside investment into eventual municipal infrastructure.

I asked if Councillor Garwood remembered Mayor Coughlin ever calling MLG and/or Geranium the “fucking mafia.” He didn't recall it, although he'd heard a rumour that the Mayor made those comments. However, he said he and Mayor Coughlin have discussed Geranium and MLG many times, and he never recalled Mayor Coughlin saying that in any conversation he was a part of – he only knew she had raised various concerns about MLG's involvement in the boundary adjustments, and whether some of their actions were inappropriate.

I asked if Councillor Garwood remembered Mayor Coughlin ever making comments like “it's Geranium and fucking MLG – they have tentacles”, or “they sort of infiltrate everything like an octopus.” He wouldn't say he heard those exact words – he said Mayor Coughlin has spoken about Geranium's connections, or perhaps ‘clout’, because in any conversation with them they have self-proclaimed their vast network throughout the province, which he knew Mr. Giampietri was proud of. He said he didn't know Mr. Giampietri very well, but in any conversation or meeting with him, Mr. Giampietri has consistently spoken about his network and ability to get things done in Ontario, and that Geranium might have more information than the Township does. He felt it would be inappropriate for Mayor Coughlin to use the alleged words, but he also thought it would be repeating what MLG proclaim themselves.

I asked if Councillor Garwood remembered meeting with Councillor Moore and Mayor Coughlin in Mayor Coughlin's office following a Special Council meeting – which he confirmed. He recalled that the Council meeting was pretty long, and he felt in the moment it was strange for him, Councillor Moore, and Mayor Coughlin to be together, because the three of them don't have many conversations.

Councillor Garwood said he didn't do much talking during the meeting – he just recalled sitting there and listening for an hour. He said there was definitely discussion about MLG, which he didn't recall the specifics about, but MLG was pursuing an alternative that Mayor Coughlin didn't support. Councillor Garwood said he found the conversation and tone very civil, and the fact everyone was getting along surprised him. I asked if Councillor Garwood recalled Mayor Coughlin being emotional during their meeting; he said he wouldn't use that word, but he recalled Mayor Coughlin was passionate or frustrated, which wasn't abnormal because she wears her feelings on her sleeve, and when he thinks of 'emotion' he thinks of things like tears instead.

I asked if Councillor Garwood recalled Councillor Moore expressing concern for Mayor Coughlin's mental health – which he confirmed, although he said he and Councillor Moore have also spoken about that other times. He believed Councillor Moore's concern, which he echoed, was for all Members of Council's mental health, since the boundary adjustment had been a challenging period, and they had also just finished a challenging Council meeting with raw emotions, so the conversation was about all Members of Council, but he said Mayor Coughlin has to carry it all as the Head of Council. Councillor Garwood remembered being pleased that three Members of Council could be vulnerable in a discussion like that and honestly discuss how they were feeling and the challenges they'd collectively been through and put aside the political attacks that had occurred.

I asked Councillor Garwood if he thought Councillor Moore and Mayor Coughlin were generally opposed – to which he agreed, saying "100%". He said Councillor Moore represents herself more professionally than other Council colleagues, but she and Mayor Coughlin have had a storied eight years together on Council, and during the present term they have often been on alternate sides for most points, so he knew they didn't have a relationship overall – which was why he remembered that it seemed strange for the November 10 meeting to be happening in the first place.

Upon my asking, Councillor Garwood said Councillor Fisher is even more opposed to the Mayor – they have very differing opinions about the Township's future and have publicly sparred many times. Councillor Garwood said Councillor Fisher has made his feelings publicly known that Mayor Coughlin does an inadequate job, so they have no relationship at all, and he was unsurprised to hear me raise his name in a complaint against Mayor Coughlin.

I asked Councillor Garwood if Mayor Coughlin would call him during evenings. He said they have spoken at various times of day, which included in the 9:00 or 10:00 pm range, but said the majority of the Township's council have day jobs and children – so anytime he's speaking with any Member of Council, it's often between 7:00 to 10:00 pm, because that's when he can normally take those calls.

Councillor Garwood added that he felt character is an important part of Council's work, and opined that Council have used the Integrity Commissioner process as a political weapon many times. He said he has a professional relationship with Mayor Coughlin and believes she is the right person for the job – she's given her life to public service and never quits; she's imperfect, but she fights hard for the Township's residents, so he said he stood by her character. However, he said a majority of Council are hellbent on raising any attack against her, and there has been inconsistent accountability among Council – so if Members of Council wanted responsibility for things they've said, then Members like Councillor Fisher needed to look in the mirror too. He said this term has become very personal, with Members of Council speaking ill about each other, and unfortunately many of their families too, and Council has rightfully earned a media reputation as the "Jerry Springwater" show. He said he tries his best to steer clear of it, but a portion of Township stakeholders will do anything to take Mayor Coughlin down, and he wished they would spend time making the Township the best place it can be rather than attacking each other. He said he has no blind faith in Mayor Coughlin, but likes to think he's a good judge of character, and he's chosen to work with her because he believes in her vision for the Township, and that she's a good person all-around.

I asked if Councillor Garwood perceived Mayor Coughlin had any other support on Council – to which he replied, "she doesn't". He said there's been a clear 4-3 split on Council from day one, and he and one other Member have supported her,

but the other four Members of Council have made clear they don't think Mayor Coughlin should be in her position and have done what they can to tear her down. He said some have been more blatant than others – particularly Councillor Fisher and Deputy Mayor Cabral – but Councillors Moore and Alexander have also participated in those discussions and resolutions. Councillor Garwood said he tries to work with everybody as long as they're reasonable, and tries to find balances and similarities, but 'reasonable' hasn't been a good descriptor for this term's Council.

Mayor Jennifer Coughlin

I spoke with Mayor Coughlin, who began by speaking about a cease-and-desist letter that I was unfamiliar with at the time. Mayor Coughlin denied ever using the term “fucking mafia” about Mr. Giampietri – she acknowledged that she swears, and that she's been frustrated in recent months, but claimed there is a list of words she can never say (although it didn't include 'mafia'). However, she said she doesn't go around telling people they're the mafia and definitely doesn't say it in Council or any professional setting.

I asked Mayor Coughlin if she ever referred to MLG as “broke” or “going bankrupt.” She said she didn't believe she said it exactly like that – she remembered calling Mr. Geddes, who is her “uncle/cousin” and an MLG consultant, to ask questions about MLG because she was concerned about things that were happening in the community she was hearing about, but Mr. Geddes told her MLG's financial status was fine. She clarified that Mr. Geddes isn't her blood uncle, but he encouraged her to run for Council 12 years ago, so he's been a mentor and friend to her, and the situation has been difficult on many levels.

Mayor Coughlin said as things were unravelling, the City and MLG were still trying to meet face-to-face because they were going to be partners for many years, and the question about MLG's finances came up again, but she barely spoke at all. She said those meetings usually include her Assistant (Shelley Westlake-Brown), and more recently Councillor Thompson.

Mayor Coughlin confirmed that she commented along the lines that MLG had “tentacles”. She said Simcoe County doesn't deal with water/wastewater services, but they got a Report asking their Council to vote that they either supported the

negotiations with the City of Barrie or they didn't. She said on the night before the meeting the Mayor of Clearview Township, Doug Measures, called her while she was shopping with her daughters and mother-in-law, and asked if she was OK with 'Option 3' – which she didn't understand at first, so she asked her sister-in-law to drive. She said the Report said the wastewater servicing would come from within the Township, and she was unfamiliar with any other County Reports saying where servicing should come from – so she called the Warden then and asked how this was happening. He replied he hadn't reviewed the Report yet, but she retorted that this came from 'his' office and it was beyond uncomfortable for her, so she asked the Warden if it could get it removed, or she'd have to ask the questions publicly, which she preferred to avoid. Mayor Coughlin said she wasn't saying the integrity of County staff was compromised, or even that MLG wrote the report, but she wanted to know how Option 3 got in there, as she thought they had moved on.

I asked Mayor Coughlin if there was any reason I should doubt the reliability of witnesses Mr. Giampietri asked me to speak with – i.e., Councillors Moore and Fisher, Warden Clarke, and Mr. Geddes. Mayor Coughlin replied that there was no reason to doubt any of them, although she hadn't spoken to Councillor Fisher about this. She acknowledged speaking with Councillor Moore – she recalled a point where she didn't know what she could do at Council, so she wrote to the Minister asking for help, but Councillor Moore reached back to staff asking about the appropriateness of the letter. Mayor Coughlin said she called Councillor Moore that night (December 11) for the first time in a long time and laid the situation out for her.

I asked if Mayor Coughlin recalled the Special Council meeting of November 10. She said the Township previously retained the services of Loopstra Nixon (specifically Quinto Annibale) to assist in its negotiations with the City of Barrie, and the Township was informed then that Loopstra Nixon also represented MLG. She believed there was a March 6, 2023 letter that stated MLG didn't have the capacity or desire to service the Remington and Sadlon lands, and that they weren't part of the MSP, which led her and former CAO Jeff Schmidt to approach the City of Barrie for potential servicing. Mayor Coughlin said Loopstra Nixon assured the Township in its retainer that there was a "firewall", and she said the Township proceeded because there wouldn't be a conflict as MLG wouldn't be servicing the lands anyway.

Mayor Coughlin said Mr. Annibale was notified on November 7 that his services were no longer required, but Councillor Fisher subsequently introduced a motion to re-retain Loopstra Nixon – the length and legalese of which shocked her. She said Strong Mayor vetoes are allowed on anything interfering with a provincial priority.

Mayor Coughlin – who struck me as frequently emotional and tense during our discussion – said she was at Princess Margaret Hospital dealing with her mother’s cancer when she learned of Councillor Fisher’s motion. Upon composing herself, she said she was surprised MLG weren’t actually thanking her, because her first election (2014) was ostensibly about stopping the MSP – but she ran to champion it, even though she didn’t know who MLG were then, but she knew Mr. Geddes and the Township and MLG had an incredible partnership for 10 years. However, she said on June 6, 2025 (the day of the County Gala) she learned that MLG not only wanted to service the Remington and Sadlon lands, but now also wanted to bring an additional 10,000 units/homes to the Township – even though their current plan for 10,000 homes hadn’t been built yet, nor their wastewater treatment facility. Mayor Coughlin said she couldn’t support more homes in those circumstances, and asked MLG to continue the existing plan and work with the Township, but MLG disliked that, and conveyed that night that they were pulling their funding for the golf tournament the next week, of which they had been the Gold Sponsor for years.

I asked if Mayor Coughlin recalled speaking with anybody in the hallway behind Council Chambers after the November 10 meeting. She didn’t recall details of any conversations, but said she might get accused of saying “this is fucking gross, I can’t believe this is happening right now”. So she described that she threw up and was physically ill. She said after her December 11 phone call with Councillor Moore, and getting the cease-and-desist letter, she deleted MLG’s phone numbers from her phone – so to communicate with MLG she now goes through Ms. Westlake-Brown, and Councillor Thompson also attends the MLG meetings, because she “won’t let this happen ever again.” Mayor Coughlin said she used the word “tentacles” for MLG because she was trying to look up a way to describe the situation and didn’t know another way to describe them without sounding crazy.

I asked if Mayor Coughlin recalled a meeting in her office with Councillor Moore and Councillor Garwood, which she confirmed – it was just the three of them, which hadn't happened before, although she didn't think it was actually after the November 10 meeting, but she acknowledged she didn't write things down. She said the Township had a Council meeting the day after the County Council's yes/no vote about the City of Barrie – which the County ultimately voted on with the servicing component removed. But the next day Township Council was somehow voting on a motion from Councillor Moore regarding whether the Township supported the original County wording that County Council itself didn't even support, and that it be sent to the Minister. She said Strong Mayor powers allow a veto process within 48-hours before any by-law becomes enacted, and she probably said something wildly inappropriate to Councillor Moore, but was telling her she couldn't just speak for Council because she wanted to – Council works either by resolution or Strong Mayor direction. She added that she said Councillor Fisher didn't write his motion, which she had no problem going on record about.

Mayor Coughlin confirmed remembering a discussion with Councillors Moore and Garwood about concern for the mental well-being of Members of Council. She didn't recall the wording, but remembered Councillor Moore saying something like she "hated this". Mayor Coughlin remembered feeling like she was "done with this, and that it was too gross and big and beyond me", and that Councillor Moore was empathetic to it. Mayor Coughlin told me she uses the words 'gross' and 'fuck' a lot, and apologized for it.

I asked Mayor Coughlin to comment about the incident I heard about the Barrie restaurant. She said it concerned something that became the subject of a different Integrity Commissioner complaint from Councillor Moore. She confirmed going into the restaurant and sitting down, and the other councillors saying they had quorum – but Mayor Coughlin said she replied "no, fuck that, we only have quorum if we're moving the business of the Township forward. But I'm only here to say why I don't want to be associated with you, let's have it out." She said Councillor Moore described the incident at a later Council meeting, but in her view they were at a bar, and she doesn't swear in front of kids, or with the chain of office on – she said she can "turn it on and off", but acknowledged that she swears and was sorry for it. Mayor Coughlin then elaborated that Ms. Shindruk reached out to her asking for Councillor Moore's phone number, because MLG wanted to

invite her to a golf tournament to get to know her, so she called Councillor Moore and asked if she could give her cell phone number to MLG – which Councillor Moore affirmed, but then later initiated an Integrity Commissioner complaint alleging that Mayor Coughlin was exerting undue influence to push the developers on her.

I asked Mayor Coughlin to respond to the allegation that her alleged use of “fucking mafia” was a slur denigrating Mr. Giampietri’s Italian heritage. She replied that she’s had numerous meetings with Mr. Giampietri, and never recalled one where either of them didn’t speak about their families – so she’d never make a comment to hurt Mr. Giampietri or his family personally, because she knows his heritage means a lot to him, and she has expressed that to Mr. Giampietri personally since this complaint was initiated. She added that Mr. Giampietri and Geranium have done many benevolent things for the community, but the last 18 months have left her with questions about how things are unfolding. She said Mr. Geddes was her connection to MLG, and the big issue in 2014 was about stopping the MSP – but she ran to try to embrace the development, and MLG liked that someone stuck their neck out for them. Mayor Coughlin said she’s never voted against anything else MLG wanted – she and Township staff could always reach compromises with them, but this time MLG wanted something and she wanted another, and there was no returning from it. She said it was the only time they disagreed in 12 years, and she truly appreciated MLG as a partner, but she was elected to make decisions in the Township’s best interests even when it’s hard, and there were so many questions about how this has all unfolded. She said she tried coming up with a better word than “tentacles”, and said she could understand how it hurt, but she also made Mr. Giampietri aware in their last meeting that she heard other things in the community that hurt her – so she looked him in the eye and apologized for her role, and said she couldn’t put a finger on what had hurt him, but she didn’t want the situation to continue. She told Mr. Giampietri that if he truly believed she’d said something that damaged him, his family, or his reputation, then she had no problem issuing a public statement letting everybody know the incredible things he had done in the community, but Mr. Giampietri replied that he’d have to take it back to MLG’s Board.

Mayor Coughlin concluded by asking me to speak with Councillor Thompson, who she said has made many attempts to find an amicable path forward. She said she hasn’t spoken alone with either Mr. Giampietri or Ms. Shindruk since June 6,

2025 – all of it has gone through Councillor Thompson, who has been at the meetings where they've tried to reconcile and find a path forward.

After our discussion, Mayor Coughlin sent me the following September 6, 2023 letter from Daniel Steinberg of MLG, which cc'd the Township's CAO, Director of Planning Services, and General Manager of Infrastructure & Operational Services (emphasis per Mayor Coughlin):

September 6, 2023

Dear Mayor and Members of Council

Re: Staff Report MZO-2023-001
The Remington Group Inc. – 727 Bayfield Street North
Midhurst Landowners Group
Township of Springwater

... The above-noted application for a Minister's Zoning Order ("MZO") pertains to lands located just to the south of the Midhurst Secondary Plan area boundary, outside of the Township's settlement area. As noted ... the subject lands "do not have access to municipal servicing."

As Council and Staff are aware, the MLG has been engaged for many years with the Township to confirm how major infrastructure requirements will be provided to facilitated the development of the Midhurst Secondary Plan area. Ultimately, the MLG will be providing hundreds of millions of dollars worth of infrastructure to service the area, including new wastewater and water treatment plants, and major road projects.

I am writing to advise Council that this proposed development has not been accounted for in any of the servicing and infrastructure planning to be undertaken by the MLG, including, without limitation, the first phases of the wastewater and water treatment plants.

The MLG further wishes to confirm that the applicant for the MZO has not approached the MLG to discuss the issue of servicing.

In the event that this proposal proceeds further through the application process, it will be imperative for the applicant to discuss the issue of servicing and infrastructure with the MLG.

Please ensure that I am provided with notice of any reports, memoranda, notices, or decisions related to the above-noted application.

Mayor Coughlin also sent me a link to the Agenda for the November 5, 2025 Council meeting⁹ – which included the following for discussion:

9.3. Legal Opinion from Loopstra Nixon LLP ... re: Possibility of Initiating a Judicial Review of the City of Barrie Proposed Boundary Adjustment
Memo¹⁰ ... regarding Legal Advice on Judicial Review of Barrie Proposed Boundary Adjustment
Legal Opinion¹¹ from Loopstra Nixon LLP ... re: Possibility of Initiating a Judicial Review of the City of Barrie Proposed Boundary Adjustment

The October 27, 2025 Memo read:

RE: Legal Advice regarding Possibility of Initiating a Judicial Review of the City of Barrie Proposed Boundary Adjustment

At its Special meeting on October 23, 2025, Council ... passed the following resolution:

Resolution C420-2025

...

That Council hereby direct staff to correspond with the author of the legal opinion ... regarding the Possibility of Initiating a Judicial Review of the City of Barrie Proposed Boundary Adjustment ... And should there be no

⁹ Agenda – November 5, 2025 Council meeting

<https://springwater.civicweb.net/Portal/MeetingInformation.aspx?Org=Cal&Id=2064>

¹⁰ <https://springwater.civicweb.net/FileStorage/643F150B16A54863AF2C1CD02622DA5F-Resolution%20C420-2025%20re%20Legal%20Advice%20on%20Judicial%20R.pdf>

¹¹ Legal Opinion – Christopher Lee (Loopstra Nixon), October 23, 2025

<https://springwater.civicweb.net/FileStorage/F4C08F4478BE468383569ED80A378FB3-Legal%20Opinion%20from%20Loopstra%20Nixon%20LLP%20dated%20Octobe.pdf>

concerns from Loopstra Nixon LLP, that staff be directed to make this resolution and legal opinion publicly available.

Carried

*Please see legal opinion attached.*¹²

The legal opinion was 12 pages long; the following was its conclusion:

CONCLUSION:

In conclusion, there are several legal avenues available for challenging or seeking review of the exercise of Strong Mayor Powers in relation to the Barrie Annexation Proposal. Each of these options involves distinct procedural mechanisms, timelines, and strategic considerations.

One potential course of action is an application to quash a municipal by-law, order, or resolution on the grounds of illegality. Such applications must be brought before the Superior Court of Justice within one year of the by-law's enactment. The court will assess whether the by-law was passed in bad faith, for an improper purpose, or in excess of the municipality's statutory authority.

Alternatively, parties may pursue judicial review by filing an application with the Divisional Court. Judicial review is available to challenge administrative decisions made pursuant to statutory powers, and the standard of review typically applied is reasonableness. The court will examine whether the decision was justified, transparent, and made through a fair process.

Where there is ambiguity in the scope or application of the relevant statutory powers, parties may seek a declaration from the court under Rule 14.05(3) of the Rules of Civil Procedure. This process is particularly suitable in cases where the facts are not materially in dispute and where legal clarity is required in an expedited manner.

¹² *ibid*

In circumstances where immediate relief is necessary to prevent harm, an injunction may be sought to preserve the status quo while legal proceedings are ongoing. ...

Councillor Brad Thompson

I spoke with Councillor Thompson and began by asking if he directly heard Mayor Coughlin make any inflammatory remarks about Mr. Giampietri or MLG in recent months. He replied that the Township has gone through a controversial experience with MLG regarding the boundary discussions, and there's been a lot of money involved, but he wouldn't call any of Mayor Coughlin's remarks inflammatory. He then added that he's probably made similar remarks. He also said he hadn't experienced something like this before, but many things haven't passed the smell test for him, and he hasn't been able to find sufficient answers. For example, Councillor Thompson said the lawyer representing the Township also represented Geranium Homes and has a direct relationship with Mr. Giampietri – so he has been trying to figure out how that was possible, but he felt Mr. Giampietri, MLG, and Geranium seemed to have influence over Loopstra Nixon's decision-making, particularly Mr. Annibale's. He said residents have sent him news articles directly linking Mr. Giampietri to Mr. Annibale, and it seemed that all of Mr. Annibale's work favoured MLG.

Councillor Thompson said he has expressed concerns to Mayor Coughlin that something didn't pass the smell test, but he gets called names at Council whenever he gets closer to the bottom of it – i.e., whenever he tries to have this information about the Loopstra Nixon issue made public, it gets very contentious, but he felt it was a clear conflict. He said he was just trying to act in the Township's best interests, and all he's seen from Mayor Coughlin is trying to look out for the Township's residents to make the best-informed decision.

Councillor Thompson acknowledged attending meetings with Mayor Coughlin and Mr. Giampietri, and said he set a few of them up, trying to play peacemaker to get them talking again. He said MLG remains a big partner for the Township, and they formerly had a great relationship, but Mr. Giampietri sent Mayor Coughlin a cease-and-desist letter. He said Mayor Coughlin apologized to Mr. Giampietri a few months ago for any misunderstandings or remarks he might have found hurtful. He said Mayor Coughlin merely disagreed with MLG about servicing

options for the Bayfield St. Corridor, and things went sour and seemed to get very personal. Councillor Thomson said Mr. Giampietri is used to getting his way and has done a very good job of getting four Members of Council to side with him.

I asked Councillor Thompson if he ever heard Mayor Coughlin refer to MLG as “broke” or “bankrupt”. He said he brought that up himself when speaking with Mr. Giampietri – i.e., that the market obviously hasn’t been kind to them. He said MLG has to build 10,000 homes, but they’ve only built 400 over the last 10 years despite investing hundreds of millions of dollars into the development, with no return – so he was sure MLG’s investors weren’t happy, which would create financial constraints for anybody. Councillor Thompson elaborated that the MSP is an agreement to build 10,000 homes within the Midhurst Settlement Area – but MLG has only built around 400 of them, some of which are selling below cost, which obviously aren’t good numbers, and their investors want to make money, which isn’t happening right now. Accordingly, he said Mr. Giampietri wanted to bring the Remington and Sadlon developments into the Midhurst Settlement Area, to help recoup some of the money MLG has already spent. But he said MLG initially said they couldn’t service those lands, so the Township went to the City of Barrie seeking servicing help – which was “what this was all about”, and Barrie agreed to do it, but MLG changed their mind and now wanted to service it, because it’d create a big financial gain. Councillor Thompson said there was never any talk about MLG going bankrupt, but the discussions were indeed about money, and MLG are well-heeled developers with deep pockets, so investors want to see returns and there had to be immense pressure on them.

I asked if Councillor Thompson had ever directly heard Mayor Coughlin call MLG and/or Geranium Corporation the “fucking mafia”. He replied “no, not directly to me” – but he said he knew others have said that, and “what Mr. Giampietri said in his letter”, and they’ve had many conversations about it. He said he was trying to get Mr. Giampietri to cool down, and asked how the letter became public on Facebook – to which Mr. Giampietri replied he had shared it. Councillor Thompson didn’t understand how that was good for Mr. Giampietri or his business.

I asked if Councillor Thompson ever heard Mayor Coughlin refer to MLG as having “tentacles”, and/or “sort of infiltrating everything like an octopus.” He said “probably yes – those are the sort of things she might have said.” However, he

then added that he had the same concerns – MLG are very well-connected at the provincial and federal levels, and seem to have a great deal of influence, and he's "been amazed at how connected they are."

I asked if Councillor Thompspon recalled Mayor Coughlin ever swearing about other topics, to which he replied "Yes – yeah, for sure. Not in Council, but in private conversations, sure."

Councillor Thompson thought the relationship between Mr. Giampietri and Mayor Coughlin has improved recently, but he opined that Mr. Giampietri hasn't shown he wants to make peace despite saying he does, and despite having been provided several opportunities to do so, during which he (Councillor Thompson) had been trying to defuse the matter. He said things changed dramatically when MLG said they wanted to service the lands that they previously said they had no interest in serving or had capacity for – which was when everything started to unravel. He said it's time for Mr. Giampietri and Mayor Coughlin to begin communicating directly, and he's told Mr. Giampietri he's tired of being the middleman, but didn't know if they've communicated since then.

Councillor Thompson felt this complaint is largely about politics and expressed that four Members of Council want this to be an election issue – they've been going after Mayor Coughlin for one thing after another, and this was just another political attack, of a sort that couldn't be made up.

After our discussion, Councillor Thompson sent me the cease-and-desist letter he referenced – which was dated December 19, 2025, sent to Mayor Coughlin by Mr. Shankman. It was similar in most respects to Mr. Shankman's January 20, 2026 Complaint that subsequently formed the basis for this investigation, but with some differences in the request for action.

Dear Mayor Coughlin,

Re: Notice under the Libel and Slander Act ...

Cease and Desist - Defamation of Geranium and Mr. Mario Giampietri

... My clients have recently been made aware of untrue and defamatory comments you have made about Mr. Giampietri and Geranium.

You and your Council are well aware of the presentations made by Geranium and Mario Giampietri on behalf of the Midhurst Landowners Group before the Township and the County ... as referred to in the County Staff Report presented to County Council during their November 4th Council meeting (the "Report").

It has been reported to our clients, and the undersigned has verified that you have made disparaging, derogatory, defamatory statements about our clients in oral conversations initiated by you. Those statements included ...:

- Referring to Geranium, and Mario Giampietri specifically, as "the Mafia"; that "they are the f...ing (abbreviated here, but spoken, in full) Mafia".*

...

- Referring to the Report, you stated that it was "corrupt"; "that MLG ... wrote that report"; and that "they (meaning MLG and our clients who represent MLG) "have tentacles everywhere".*

...

- In reference to MLG ... that "they are "broke" and, that "they are going bankrupt".*

...

... The identities and number of the people to whom you made those statements are well known to you and are not currently known by our clients.

Each of these statements is unequivocally untrue. The statements intentionally and maliciously create negative implications against Mr. Giampietri and Geranium. The contents of the statements are false. The plain and ordinary meaning and by implication and innuendo ... are each untrue and defamatory.

...

We hereby demand that you cease all similar communications regarding Mr. Giampietri and Geranium and desist from any further untrue and defamatory

commentary about them. Should we ... learn that you continue to spread false, unprofessional, and defamatory comments about Mr. Giampietri and Geranium, actions will be taken.

Mr. Giampietri and Geranium reserve all rights to pursue legal or administrative action in relation to your misconduct directed toward them.

This letter shall also constitute notice under subsection 5 (1) of the Libel and Slander Act ...

ANALYSIS

I have been the Township's Integrity Commissioner since October 1, 2025, and feel like I have quickly learned a lot. Among those learnings, I have come to understand during this investigation that Council has been involved in difficult and draining work over the last year, largely pertaining to the boundary annexation discussed with the City of Barrie. While this topic understandably interests Council and Township stakeholders greatly, it is not this Office's role to opine on any of its substance – that is for Members of Council to discuss as a political body. The focus of this investigation is much narrower – i.e., whether Mayor Coughlin contravened the Township's Code of Conduct, based on things she may have said respecting Mr. Giampietri and/or Geranium and/or MLG. Mr. Giampietri made three fundamental accusations underpinning this complaint – specifically, that Mayor Coughlin:

- 1) Referred to Mr. Giampietri, and/or Geranium and/or MLG, as the “fucking mafia”;
- 2) Stated that the November 4, 2025 Simcoe County staff report was “corrupt”, that MLG “wrote it”, and that MLG “have tentacles everywhere”; and
- 3) Referred to MLG and/or Geranium as “broke” or “going bankrupt”

JURISDICTIONAL NOTE

As a jurisdictional matter, I note that Mayor Coughlin's comments about Simcoe County staff and/or their report are a Simcoe County issue – more appropriately directed to Simcoe County's Integrity Commissioner, who I am aware also received a formal complaint from Mr. Shankman, although I do not know the specific details. I have included some evidence on point as part of describing the

full circumstances, which I believe has been necessary, given what Mr. Shankman described (validly) as a co-mingling between the jurisdictions. I will not address whether Mayor Coughlin contravened the Code of Conduct for her allegedly making comments about Simcoe County staff – that is a Simcoe County matter. However, I believe all of Mr. Giampietri’s other allegations appropriately fall within my jurisdiction as the Township’s Integrity Commissioner.

DID MAYOR COUGHLIN MAKE THE ALLEGED COMMENTS?

“Mafia”, and/or “fucking mafia”

I accept on a balance of probabilities that Mayor Coughlin referred to Mr. Giampietri and/or MLG as the ‘mafia’. Mayor Coughlin has denied this – however, I note that she also said ‘mafia’ was not among the words she would never use. More importantly, Councillor Moore and Councillor Fisher were independently adamant that Mayor Coughlin used that term, in very similar circumstances. Councillor Moore said Mayor Coughlin used the term ‘mafia’ during a December 11, 2025 telephone call. I consider Councillor Moore’s recollection of events better than Mayor Coughlin’s, generally – Councillor Moore described many details about the topics we were discussing, and at times read off contemporaneous notes she prepared – whereas Mayor Coughlin came across as flustered, and volunteered that she doesn’t take great notes about things.

Separately, Councillor Fisher recalled Mayor Coughlin describing Mr. Giampietri and/or MLG as the ‘mafia’ in a late-night phone call. Councillor Fisher also interpreted a cultural aspect in Mayor Coughlin’s use of that term, expressing doubt that she would have used ‘mafia’ if Mr. Giampietri was Polish, for example. I can easily see that Councillor Fisher and Mayor Coughlin have a strained relationship; nevertheless, I accept Councillor Fisher’s evidence that Mayor Coughlin used the term ‘mafia’, given the passion and certainty with which he described it, and its similarities to Councillor Moore’s recollection of a distinct conversation.

I reiterate that I apologize for language that I have felt unavoidably necessary to include in this report. Having said that, I accept that Mayor Coughlin probably used the term “fucking” as a modifier to the term ‘mafia’. A great deal of evidence in this Report – including an acknowledgement from Mayor Coughlin herself – establishes that Mayor Coughlin seemingly swears quite easily behind the scenes, so I don’t believe she would have exerted great effort to avoid using such terminology during private telephone conversations with other Members of

Council, outside of the public eye.

“They (i.e., MLG) have tentacles everywhere”

Evidence conclusively establishes that Mayor Coughlin used “tentacles” to describe MLG at least once, and possibly more frequently – the surely-established incident being the discussion between herself, Councillor Moore, and Councillor Garwood in her Office on November 10, 2025, following the Special Council meeting that included Councillor Fisher’s motion regarding Loopstra Nixon. It was also less than a week after the November 4, 2025 Simcoe County meeting during which County Council considered the staff report that Mayor Coughlin clearly took exception to – as reflected by the way she herself described her discussions with Mayor Measures and Warden Clarke the night before. There is no doubt that Mayor Coughlin was displeased about ‘Option 3’ having been included in the County’s staff report. Councillor Moore remembered Mayor Coughlin not only using the term “tentacles” to describe MLG, but that she also crawled her finger along a desk in doing so, like perhaps an arachnid or a cephalopod. Councillor Moore also told me that Mayor Coughlin used the term “tentacles” again during their December 11 telephone conversation.

Mayor Coughlin acknowledged using the word “tentacles”, and that she regretted having done so. She said she used it because she was trying to come up with a way to describe the situation, and “didn’t know a way to describe them without sounding crazy”, but she wished she would have come up with a better word.

“‘Broke’ or ‘going bankrupt’”

Mayor Coughlin probably used the words “broke” and/or “going bankrupt” respecting MLG. Warden Clarke told me she said MLG was bankrupt, to which he told her to stop spreading rumours like that. Most of the time, though, Mayor Coughlin was more likely asking questions about MLG’s financial health than asserting a fact on point. Several other sources (Mayor Coughlin, Mr. Geddes, Councillor Garwood, Councillor Fisher, and Councillor Thompson) told me that Mayor Coughlin made inquiries about the state of MLG’s financial health, on the basis that it was simply important information to know. I believe that even if Mayor Coughlin used the specific words “broke” or “going bankrupt”, the context they were used in outweighs their significance in themselves.

[continued on next page]

DID MAYOR COUGHLIN BREACH THE CODE OF CONDUCT THROUGH HER LANGUAGE?

The relevant provision in the Code of Conduct includes:

4. Conduct of Members

4.1 A Member shall at all times conduct themselves with propriety, decency and respect and with the understanding that all members of the public, other Members and staff are to be treated with dignity, courtesy and respect, recognizing that a Member is always a representative of the Township and of their elected office. ...

Mayor Coughlin's inquiries about MLG's financial health did not contravene the Code of Conduct. Even if the words 'broke' or 'going bankrupt' were used (which wasn't established), that still would not constitute a Code contravention – they are standard language anybody might reasonably encounter in a pointed conversation inquiring about whether a corporation was experiencing financial difficulty. (I note that MLG seemingly also denied having any such financial difficulty.)

However, Mayor Coughlin's other comments ("fucking mafia", and "tentacles") – which I am satisfied were made – are another story. Simply put, there is no way to interpret either term as being respectful towards Mr. Giampietri, MLG, and/or Geranium. One of these terms references a crime syndicate, and the other sub-human life forms. The Code of Conduct states, verbatim, that all members of the public are "to be treated with dignity, courtesy and respect." There is no reason not to adopt an ordinary, plain-language understanding of those words – and the comments were disrespectful. I attribute little weight to the fact Mr. Giampietri wasn't personally present, because one of the risks in making such comments anywhere is that they can ultimately make their way to the subject of the discussion – as happened here.

Mr. Giampietri ascribed great pain to the term 'mafia', given his cultural heritage, and I have no reason to question his position. While I cannot automatically ascribe a deliberate cultural intention behind Mayor Coughlin's use of the term, it would be unreasonable for me to ignore that the term "mafia" is heavily culturally linked to people of Italian heritage. In describing why she used the term "tentacles", Mayor Coughlin said she considered MLG a powerful and well-connected entity, with great influence within Ontario. Councillors Thompson and Garwood – while having no direct knowledge of Mayor Coughlin using either term – similarly described Mr. Giampietri as well-connected and someone who enjoys talking

about that volume of connections. Accordingly, I have a feeling about what Mayor Coughlin might have been trying to describe, which would not automatically have had any cultural connotation; but the use of the word ‘mafia’ was a particularly poor choice of descriptor, and it is plainly understandable why Mr. Giampietri would have perceived a cultural aspect to the insult. Councillor Fisher interpreted the same thing without even being asked. In short, both ‘mafia’ and ‘tentacles’ were plainly disrespectful and there should be no debate that Mayor Coughlin’s usage of those terms contravened section 4 of the Code of Conduct.

I note that evidence in this case has established that Mayor Coughlin has seemingly sworn several times outside of the public eye. There is some question whether I should appropriately express any opinion on that. Section 2.2 of the Code of Conduct does state:

2. Purpose and Principles

...

2.2. The public expects the highest moral and ethical standards of conduct from Members that it elects. The behaviour and actions of Members is expected to reflect the principles of accountability, transparency, and public trust. Adherence to these standards will protect and maintain the Township’s reputation and integrity.

Section 2 is only a Preamble section to the Code of Conduct, though – i.e., incapable of contravention in its own right. I also note that some Integrity Commissioners elsewhere in the province have taken positions that similar language – even when publicly directed towards specific individuals – would not contravene the local Code of Conduct. For example, in a 2021 investigation,¹³ the City of Peterborough’s Integrity Commissioner stated: [**emphasis** maintained from original]

D. Did the Mayor’s Tweet’s contravene paragraph 10 a), by using indecent, abusive or insulting words or expressions towards any member of the public?

102. No.

¹³ *Chan v. Therrien*, 2021 ONMIC 6 (June 3, 2021)

<https://www.canlii.org/en/on/onmic/doc/2021/2021onmic6/2021onmic6.pdf>

103. *The mayor told people to stay the f##k home and to go f##k themselves, called them clowns and selfish dullards, and made an offensive hand gesture. I find, however, that she did not contravene paragraph 10 a) of the Code by using indecent, abusive or insulting words or expressions. In fact, it would trivialize the Code of Conduct to find that her words and gesture are covered.*

104. *Codes of Conduct and Integrity Commissioner inquiries are significant matters. ...*

105. *These are serious provisions, and their implementation comes with a material cost to each municipality. In my view, it is inconceivable that, when it enacted this regime, the Legislature had in mind the dropping of F-bombs or the use of words such as “clown”.*

106. *... Residents offended by a Council Member’s use of the F-word will take offence. Residents who want to applaud the language will applaud. Residents who don’t care will remain indifferent. Nothing in an Integrity Commissioner report on the F-word is likely to add new information or to change anyone’s mind. **In my view, this is precisely why the Legislature could never have intended that Integrity Commissioners would be appointed to police the saying (and Tweeting) of the F-word.***

...

110. *Courts in both Canada and the United States have held that the use of profanity ... to express oneself, is protected expression, in particular where the profanity is used to convey emotion, emphasis, or tone.*

...

I have not specifically adopted the above approach in my own analyses, notwithstanding that I do find elements of it persuasive. I believe the “propriety, decency, and respect” provision in the *Code of Conduct* exists for a reason, and that various disrespectful behaviours by Members of Council could conceivably contravene it. As an example, I found the following last year in a case in the City of Sarnia:¹⁴

¹⁴ *Bolter v. Dennis* – IC-35280-1124 (June 11, 2025)
<https://sarnia.civicweb.net/FileStorage/C89842AC467D4FA2854FCF5B055FEA5C-Final%20Report%20-%20IC-35280-1124%20-%20Bolter%20v.%20Dennis.pdf>

Mr. Bolter asked Councillor Dennis to retract his statement – which Councillor Dennis opted not to, and then exacerbated things by stating:

Andrew, if you continue to slander me on social media I will sue the shit out of you. Go fuck yourself.

I mean, come on. I am nearly out of role-appropriate descriptions for such conduct. ... Councillor Dennis' words are understood by everybody, and I have no need to formally define them – they were vulgar and disrespectful towards Mr. Bolter, and plainly contravened section 12.2 of the Code of Conduct on their face ...

In this case, though, I do not consider Mayor Coughlin's swearing a Code contravention on its own, given that they all occurred during private conversations between professional Council colleagues and were not directed towards the recipients themselves.

Decision and Publication

I have determined that Mayor Coughlin contravened Rule 4 of the *Code of Conduct* through her fall 2025 comments that referenced Mr. Giampietri and/or MLG as the "mafia", with "tentacles" everywhere, and in one instance comparing them to an octopus. The Township's Code of Conduct notes the following procedural steps when I find that the *Code of Conduct* has been contravened.

17. Complaint ... Process

...

17.9. Before finalizing a report to Council which recommends sanctions, the Integrity Commissioner shall provide the Member with the basis for their findings and any sanctions that may be recommended. The Member shall have the opportunity to comment further ... to the Integrity Commissioner on the proposed findings and sanctions.

17.10. Upon conclusion of a complaint investigation, the Integrity Commissioner shall:

a) issue a report to Council on the findings ... and, where there is a finding of contravention of the Code, the report shall contain the detailed findings,

any recommended sanctions, or any settlement; and

b) provide a copy of the final report to the Member at the same time as the final report is made available to the Clerk and to the complainant at the same time as the report becomes public.

...

17.13 The Integrity Commissioner's report ... shall be placed on an agenda for consideration at a public meeting of the Council, in accordance with the Procedure Bylaw, as determined by the Clerk in consultation with the Integrity Commissioner.

18. Penalties

18.1. Upon receipt of a final report and the recommendations of the Integrity Commissioner, Council may, where the Integrity Commissioner has determined there was a violation of the Code, impose either of the following two (2) penalties:

a) a reprimand; or

b) suspension of remuneration paid to the Member in respect of their services as a Member for up to ninety (90) days.

Section 18.2 also purports to outline additional actions that Council can take. However, my own opinion is that nothing in section 223.4(5) of the *Municipal Act, 2001* grants Council authority to take any action greater than those listed above, as a direct response to a Report from my Office stating the Code was contravened. That section of the *Municipal Act, 2001* (the constating legislation) reads entirely:¹⁵

223.4 Inquiry by Commissioner

...

Penalties

(5) The municipality may impose either of the following penalties on a member of council ... if the Commissioner reports ... that, in his or her opinion, the member has contravened the code of conduct:

¹⁵ *Municipal Act, 2001*, S.O. 2001, c. 25 <https://www.ontario.ca/laws/statute/01m25>

1. *A reprimand.*
2. *Suspension of the remuneration paid to the member in respect of his or her services as a member of council ... for a period of up to 90 days.*

No further penalties are listed in the *Act*. Accordingly, I believe the maximum penalty Council is legislatively empowered to impose upon Mayor Coughlin pursuant to the *Municipal Act, 2001*, in direct response to this Report, is a suspension of pay for her services for a period up to 90 days.

This is my first Report finding a contravention of the *Code of Conduct* by Mayor Coughlin since my October 2025 appointment. I do not feel her actions reflect on the Township particularly well and also acknowledge the significant power imbalance that necessarily exists between a Mayor and any other member of a municipality's Council or staff. I am also prepared to accept Mr. Giampietri's remarks at face value regarding how Mayor Coughlin's comments impacted him.

One of the foremost goals in imposing penalties under the Code of Conduct is to prevent similar conduct from recurring in future. Having contemplated the circumstances, I do not expect imposing a financial penalty upon Mayor Coughlin is likely to impact her future conduct any more than merely issuing a reprimand would. Mayor Coughlin struck me as deeply embarrassed by this sequence of events. She told me she would never intentionally say anything to insult Mr. Giampietri or his family, and that she has personally apologized to him more than once since this complaint was initiated. She also indicated a willingness to publicly speak to many positive things Mr. Giampietri has done for the Township for years. It is straight-forward to observe that the Township and its residents might be best served by Mayor Coughlin and Mr. Giampietri simply improving their relationship again going forward. This Office cannot order that, though and only Mr. Giampietri and Mayor Coughlin have any power to influence it. But I am not satisfied that imposing a financial penalty would assuredly serve any public benefit – especially given my opinion that merely distributing this report publicly (which the Code of Conduct obliges me to do for all completed investigations) might be a form of consequence in itself to Mayor Coughlin.

Accordingly, I recommend that Council reprimand Mayor Coughlin for her contraventions of Rule 4 of the Code of Conduct described herein. Rule 18.1 of the Code of Conduct makes clear, though, that the ultimate decision-making power lies with Council, within the parameters in section 223.4(5) of the *Municipal Act, 2001*.

POST-DRAFT COMMENT OPPORTUNITY PROVIDED TO MAYOR COUGHLIN

Section 17.9 of the Code of Conduct mandates the following comment allowance within the complaints process:

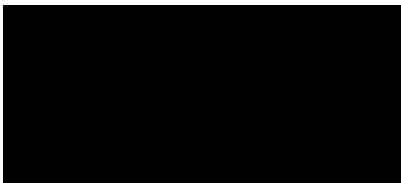
17.9 Before finalizing a report to Council which recommends sanctions, the Integrity Commissioner shall provide the Member with the basis for their findings and any sanctions that may be recommended. The Member shall have the opportunity to comment further, either in writing, verbally or in person to the Integrity Commissioner on the proposed findings and sanctions.

My Office provided a copy of my Draft Report to Mayor Coughlin on June 3, 2026, and invited her to provide any comments on the findings. However, Mayor Coughlin advised on June 15, 2026 that she had no additional comments.

I thank the parties for their cooperation in this complaint process, and now consider this matter concluded.

Dated at Toronto, this 30th day of June, 2026.

Respectfully submitted by,



Benjamin M. Drory
Integrity Commissioner