

**From:** [Daniel Mandel](#)  
**To:** [councilmeeting](#)  
**Subject:** [External Sender] My comments for 2026.CC40.1 on April 22, 2026 City Council  
**Date:** April 20, 2026 1:28:58 PM

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To the City Clerk:

Please add my comments to the agenda for the April 22, 2026 City Council meeting on item 2026.CC40.1, Payment of Legal Expenses Related to an Integrity Commissioner Investigation

I understand that my comments and the personal information in this email will form part of the public record and that my name will be listed as a correspondent on agendas and minutes of City Council or its committees. Also, I understand that agendas and minutes are posted online and my name may be indexed by search engines like Google.

**Comments:**

Dear Mayor Chow and Members of Council:

I am writing as a Toronto resident to formally **oppose** any motion, recommendation, or staff report that would authorize the reimbursement of approximately \$28,105.93 in legal fees incurred by Councillor Chris Moise in connection with a matter in which he was found by the Integrity Commissioner to have contravened the City of Toronto *Code of Conduct for Members of Council*. I respectfully request that Council direct that this expense be borne personally by the Councillor and not by Toronto taxpayers.

I also ask the City Clerk to publish these comments on the agenda page for the relevant item so that they are publicly visible alongside the submissions of other residents.

### **1. The request falls outside the purpose of the Indemnification Policy**

The City's *Indemnification Policy for Members of Council* is intended to protect Members from personal liability for legal costs arising out of the good-faith performance of their official duties. It is not, and was never intended to be, a mechanism for transferring the cost of a Member's own misconduct to the public purse. Where the Integrity Commissioner has made a finding that a Member has breached the Code of Conduct — in this case, through derogatory remarks directed at a constituent — that conduct is, by definition, not the carrying out of official duties in the manner the policy is designed to safeguard.

### **2. The policy's narrow reimbursement criteria are not met**

Under the City's framework, reimbursement of legal fees tied to a Code of Conduct complaint is available only in narrow circumstances — principally where the Integrity Commissioner concludes that the Member *inadvertently* contravened the Code, or contravened it *in good faith*, or where the Commissioner's report was received by Council *for information only*. Making derogatory remarks toward a constituent does not reasonably fit within any of these categories. Treating it as such would hollow out the policy and undermine the accountability function the Integrity Commissioner is designed to perform.

### **3. The amount requested exceeds the applicable reimbursement cap**

The City's Code of Conduct Complaint Protocol contemplates reimbursement of legal expenses up to a maximum of approximately \$20,000, and only in defined circumstances such as where the Integrity Commissioner exercises the powers of a commissioner or where judicial review is engaged. The \$28,105.93 figure sought here materially exceeds that cap. Council should not approve an expense

that, on its face, is inconsistent with the policy's stated limits, and should require a clear, written policy basis for any dollar reimbursed — not a case-by-case *ad hoc* expansion of public indemnification.

#### **4. The quantum is disproportionate to the scope of the matter**

Integrity Commissioner investigations of the type at issue are, by design, narrow in scope. A legal bill approaching \$30,000 raises legitimate questions of proportionality and reasonableness. Before any public dollar is authorized, Council should require a full accounting of the hours, rates, and scope of work billed, and should assess whether the fees claimed are reasonable relative to the nature of the complaint.

#### **5. Fiscal stewardship and public trust**

Torontonians are absorbing substantial cost-of-living pressures, including significant recent property tax increases. In that climate, approving taxpayer reimbursement of legal costs that flow from a Member's own conduct breach would, in my respectful view, damage public confidence in Council's stewardship of public funds and in the integrity regime itself. Accountability loses its meaning if the financial consequences of misconduct are routinely transferred to the public.

#### **Requested action**

I respectfully urge Council to deny the request to reimburse Councillor Moise's legal fees in full;

Daniel Mandel