



**MANITOBA
LEGISLATIVE ASSEMBLY**

**ANNUAL REPORT OF
THE ETHICS COMMISSIONER**

Jeffrey Schnoor, K.C.

2025



MANITOBA LEGISLATIVE ASSEMBLY
Ethics Commissioner
303 - 386 Broadway
Winnipeg, MB R3C 3R6

January 28, 2026

The Honourable Tom Lindsey
Speaker of the Legislative Assembly
Province of Manitoba
Rm. 244 Legislative Building
Winnipeg, MB R3C 0V8

Dear Speaker Lindsey,

I am pleased to present my annual report for the year ending December 31, 2025. The report is made pursuant to section 56(1) of *The Conflict of Interest (Members and Ministers) Act*.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Jeffrey Schnoor'.

Jeffrey Schnoor, K.C.
Ethics Commissioner



ETHICS COMMISSIONER

ANNUAL REPORT 2025

Introduction

This is my third annual report as Ethics Commissioner under *The Conflict of Interest (Members and Ministers) Act*, which came into force on October 4, 2023. Before that, I submitted seven annual reports as Conflict of Interest Commissioner, as the position was known under the previous statute, *The Legislative Assembly and Executive Council Conflict of Interest Act*.

This is also my final annual report. I have submitted my resignation as Ethics Commissioner effective January 31, 2026, and will be taking up the position of Conflict of Interest Commissioner for the British Columbia Legislative Assembly.

It has been an honour and a privilege to have served the Manitoba Legislative Assembly and the citizens of Manitoba for the last ten years. I take pride in my role in moving Manitoba from outdated legislation to its current statute. The new Act opened the door to a modern, online approach to the disclosure by members of the Legislative Assembly of their assets, liabilities and sources of income and to greater public access to that disclosure through the Ethics Commissioner's website. The new Act also created an improved mechanism for accountability by empowering the Commissioner to investigate alleged breaches of the Act and to recommend penalties where appropriate.

The ultimate purpose of conflict of interest legislation is to contribute to public confidence in our elected officials and in our democratic institution – to assure the public that the members of the Legislative Assembly are acting in the public interest and not for a private interest. The Commissioner plays an important role in achieving these objectives and I have found the work to be meaningful and rewarding.

In this position, I have had the unique opportunity to meet with all members of the Legislative Assembly over the last ten years. I am grateful that they have understood and appreciated the role of the Ethics Commissioner. They have sought my advice often and accepted it, even when they perhaps wished for a different answer.

In the balance of this report, I will highlight some of the main provisions of the Act and some of my activities during the past year. The Act can be viewed at [C.C.S.M. c. C171 \(gov.mb.ca\)](http://C.C.S.M.c.C171.gov.mb.ca). More complete information about the Act can be found on the Ethics Commissioner's website: www.ethicsmanitoba.ca.

Dealing with Conflicts of Interest

The Act defines conflict of interest: “a member is in a conflict of interest when the member exercises an official power, duty or function that provides an opportunity to further their private interests or those of their family or to improperly further another person's private interests.”. It is important to note that a conflict of interest exists if there is an opportunity for a member to prefer a private interest over the public interest. The key is that the member acts appropriately if the opportunity exists.

The Act specifies that a member must not do certain things if a conflict of interest exists:

- A member must not make a decision or participate in making a decision related to the exercise of an official power, duty or function if the member knows or reasonably should know that, in making the decision, the member would be in a conflict of interest.
- A member must not use their position to seek to influence a decision of another person so as to further the member's private interests or those of their family or to improperly further another person's private interests.

A member who has reasonable grounds to believe that they have a conflict of interest in a matter before the Legislative Assembly or the Executive Council (Cabinet), or a committee of either of them, or the board of a government agency on which the member serves, must, if present at a meeting considering the matter,

- disclose the general nature of the conflict of interest;
- withdraw from the meeting without voting or participating in consideration of the matter; and
- refrain at all times from trying to influence the matter.

Except where the disclosure is made at a meeting of Cabinet or one of its committees, the clerk or secretary of the meeting must make a record of the disclosure and file it with the Ethics Commissioner. It is then posted to the Commissioner's website. No such disclosures were received as of December 31, 2025.

The Disclosure Process

Transparency is an important part of the Act. Subject to some exceptions, every member of the Legislative Assembly must disclose their assets, liabilities and sources of income. All disclosures are made by members online.

Members must file a draft of their disclosure statement with the Ethics Commissioner within 60 days of assuming office. If requested, they must meet with the Commissioner to discuss their disclosure. They must file a finalized disclosure statement within 90 days of assuming office.

This process is repeated annually. Members must file an updated draft of their disclosure statement with the Ethics Commissioner within 30 days after the date established by the

Commissioner for the annual review. Once again, if requested, they must meet with the Commissioner to discuss their disclosure. Members must file a finalized annual disclosure statement within 60 days after the date established by the Commissioner.

In addition, members must file a statement reporting a material change to the information on their most recent disclosure statement. This must be done within 60 days after the change. This year, 19 amendment statements were filed.

After they have been reviewed and accepted by the Commissioner, all finalized disclosure statements from members are posted to www.ethicsmanitoba.ca and can be viewed under 'Public Disclosures'/'Search Member Statements'.

Cabinet ministers must file additional disclosure statements covering assets, liabilities and sources of income that would otherwise be excluded from disclosure. These additional statements are kept confidential by the Commissioner.

The annual review required by the Act was held in October and November of 2025 and I again met with all 57 members of the Legislative Assembly. The disclosure statements from that review were posted on November 17, 2025.

Meetings and Advice

In addition to the formal meetings described above, I am available to members at any time to provide confidential written or oral advice on any questions they may have about their obligations under the Act.

During 2025, I had approximately 81 phone calls, meetings or email exchanges with members on a wide variety of topics (some covered more than one issue and some exchanges involved multiple calls, emails or meetings). Some of these calls and meetings included help to members with the online disclosure process.

In addition, there were two byelections in 2025 and I provided an orientation to both of the new members.

The Act sets out certain restrictions on the activities that former members and ministers may undertake after their departure from office. I responded to several requests for advice about these provisions of the Act.

Gifts

With some exceptions, the Act requires members to disclose all gifts with a value exceeding \$250 within 60 days of receipt. This year, 37 disclosures of gifts were received and posted to the Ethics Commissioner's website.

Private Air Travel

Members may not accept travel on a non-commercial chartered or private aircraft – other than one owned or leased by the Crown – that is connected, directly or indirectly, with the performance of their official powers, duties or functions unless the member receives approval from the Ethics Commissioner before accepting the travel or the travel is required for the performance of the member's office. In either case, information about the travel must be posted to the Ethics Commissioner's website.

As of December 31, 2025, three requests were sought and approved in advance and eight statements respecting travel required for the performance of a member's office were received after the travel was completed.

Private air travel was the subject of one of the complaints that I received this year alleging a breach of the Act. In my report, I provided further guidance to all members about the circumstances in which this provision applies.

Requests for Inquiries

Any member of the Legislative Assembly who has reasonable grounds to believe that another member has contravened the Act may ask the Ethics Commissioner to give an opinion on whether the other member has breached the Act. Only a member of the Legislative Assembly can make this request. The Commissioner has broad powers to investigate the alleged contravention.

If, after conducting an inquiry, the Commissioner is of the opinion that the member has contravened this Act, the Commissioner may recommend that any of the following penalties be imposed:

- the member be reprimanded;
- the member be fined an amount not exceeding \$50,000;
- the member's right to sit and vote in the Assembly be suspended for a specified period or until the fulfilment of a condition imposed by the Commissioner;
- the member's seat be declared vacant.

The Assembly must consider a report of the Commissioner within 10 sitting days after the report is tabled. The Assembly can either order the penalty recommended by the Commissioner be imposed or can reject the recommendation. The Assembly cannot impose a penalty other than the one recommended by the Commissioner and cannot inquire further into the matter. The Assembly's decision is final and conclusive.

As of December 31, 2024, seven requests to investigate an alleged contravention of the Act were received. A further three requests were received in 2025. Two reports were completed and submitted to the Legislative Assembly in 2024. Reports on the remaining 8 requests were

completed and submitted to the Legislative Assembly in 2025; one of the reports dealt with allegations against four members together. The full text of all reports can be found at the Ethics Commissioner's website, under 'Publications and Resources' / 'Investigation Reports'.

All but one of the reports submitted to the Legislative Assembly this year were considered by the Assembly; the other report was submitted in December and will be considered in 2026.

Only one of the reports submitted in 2025 found that the Act had been breached and, regrettably, after a lengthy investigation, I was obliged to recommend significant penalties against former Premier Heather Stefanson, former Deputy Premier Cliff Cullen and former Minister Jeff Wharton. All of the other reports found that the Act had not been breached.

I am pleased to report that the Legislative Assembly unanimously accepted the conclusions and recommendations in each of my reports that it considered in 2025.

Errors in the Act

As I have noted for several years, the new Act contains several drafting errors that should be corrected. I will not repeat them yet again. I will simply repeat that it would be desirable to correct these errors and it should not be difficult. I hope that these amendments are made as soon as possible.

Relationships with other jurisdictions

As always, the Canadian Conflict of Interest Network (CCOIN) has been an invaluable source of information and support. CCOIN is an informal organization that brings together Ethics and Conflict of Interest Commissioners from across the country, and I am grateful for the opportunity to consult with and learn from my colleagues. We meet in person annually and we met this year in Victoria, British Columbia.

Our office also belongs to the Council on Governmental Ethics Laws (COGEL) and a similar organization within the international francophone community, le Réseau francophone d'éthique et de déontologie parlementaires. These memberships provide a broadened perspective on ethical issues.

Lobbyists Registry

In addition to being the Ethics Commissioner for the Manitoba Legislative Assembly, I am also Manitoba's Lobbyist Registrar. *The Lobbyists Registration Act* is companion legislation that contributes to the ethical framework within which the members of the Legislative Assembly work. Although that Act has no requirement for an annual report, I have made it my practice, in the interests of public education, to provide some information about the operation of that legislation here.

The Act is based on the principle that lobbying, when done ethically, is a legitimate activity and is part of the democratic process. The Registry brings a measure of transparency to that activity, providing information to the public about who is attempting to influence government and the details of the lobbying. Under the Act, consultant lobbyists (those paid to lobby for others) file detailed returns in the online registry, documenting their lobbying activities, and senior officers of organizations file detailed returns documenting the lobbying activities of their organization's in-house lobbyists. There is no cost to file a return and no cost to search the online registry.

Certain types of organizations and certain activities are excluded from the Act. For example, in-house lobbying that does not constitute a significant part of an individual's duties does not have to be registered. The regulation to the Act defines this as at least 100 hours annually; when multiple individuals have a duty to lobby, the hours are added together as if performed by one employee. The Act does not apply to charitable or non-profit organizations, unless they are constituted to serve employer, union or professional interests or the interests of for-profit organizations.

The Lobbyist Registrar has no enforcement powers. Instead, a failure to comply with the Act is an offence, making it a matter for prosecution in the courts.

The following provides some statistical information as of December 31, 2025, together with comparisons from previous years. The significant reduction in numbers for 2025 is notable.

Year	Active consultant lobbyist returns	Active returns filed by senior officers on behalf of organizations	In-house lobbyists
2025	104	72	285
2024	141	78	302
2023	113	75	303
2022	112	70	294
2021	92	65	285

I also take this opportunity to again remind lobbyists that, as of October 4, 2023, *The Lobbyists Registration Act* prohibits lobbyists from giving or promising any gift or benefit to a public official being lobbied, except if given as an incident of protocol or social obligation that normally accompany the duties or responsibilities of the public official. An Interpretation Bulletin explaining the prohibition on gift-giving and the exception can be found at our website.

More information about the Act and the registry (including how to search the registry at no cost) can be found at www.lobbyistregistrar.mb.ca.

Conclusion

I would again like to thank the office of the Clerk of the Legislative Assembly. The support of Rick Yarish and his staff has been invaluable. I am particularly grateful for again allowing me the use of their offices for my annual meetings with members. New procedures were needed for tabling and considering investigation reports and it was an honour to work with the Clerk on this.

I would also like to thank the Administration Branch of the Legislative Assembly of Manitoba, led by its Executive Director, Deanna Wilson. Special thanks go to Zdenek Ondracek, IT Director, and his successor, Stan Fry, and Sebastian Czigler for their continued support of the online disclosure process.

Special appreciation also goes to Sherri Walsh, my outside legal counsel. She has provided me with wise and knowledgeable advice whenever I have needed it and I am very grateful.

We are a small two-person office. When I began my role as Conflict of Interest Commissioner in 2016, Holly Mackling was already there as the Deputy Lobbyist Registrar and assistant to the Commissioner. She made my arrival seamless and, over the last ten years, we have been a good team. As my role expanded with the new Act, so did hers. I am deeply grateful for her invaluable work and support over the last ten years. In August of 2025, Holly took a well-deserved retirement; she will be missed and I wish her well. We were fortunate to find an excellent replacement in Janet Cairns and I know that she will serve my successor well.

Finally, I would like to thank all the MLAs that I have had the pleasure of working with over the last ten years. It has been an honour to serve them and, in doing so, to serve the people of Manitoba.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Jeffrey Schnoor', written in a cursive style.

Jeffrey Schnoor, K.C.
Ethics Commissioner