

Request for investigation under By-law No. 2012-309 (Lobbyist Registry By-law) and the Lobbyists' Code of Conduct.

TO Karen E. Shepherd, Integrity Commissioner and Lobbyist Registrar
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FROM Alex Lawson, Candidate for Mayor of Ottawa
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DATE June 4, 2026

RE

Apparent breaches of By-law No. 2012-309 and the Lobbyists' Code of Conduct by Syntax Strategic Inc., Jennifer Stewart, Mackenzie Houston, Jennifer Madigan, and the Office of the Mayor. Request for investigation under the Complaint Protocol set out in the By-law, and the issuance of findings and sanctions.

ENCLOSURES

1. City of Ottawa MFIPPA release package, File A-2026-00384 (decision letter dated May 19, 2026; 100-page release package).
2. Lobby-registry search results for Jennifer Stewart, Jonelle Istead, Devon Larock, Jennifer Madigan, Mackenzie Houston, and Jamie Contarini, pulled from lobbyist.ottawa.ca on June 3, 2026.

Schedule A below sets out, in tabular form, every communication implicated in the apparent breaches at paragraphs 4.1 to 4.5, cross-referenced against the registry as searched on June 3, 2026.

01 / INTRODUCTION

- 1.1 We are writing to request that the Lobbyist Registrar open a formal investigation under By-law No. 2012-309 (the Lobbyist Registry By-law) and the Lobbyists' Code of Conduct into apparent breaches by Syntax Strategic Inc. and named representatives in relation to communications with the Office of the Mayor of Ottawa over the period November 1, 2022 to April 21, 2026.

- 1.2 The evidentiary base for this request is the City's own records, recently released to the public through the access regime: MFIPPA File A-2026-00384, decision letter dated May 19, 2026, releasing 100 pages of Mayor's Office records concerning meetings with Syntax Strategic and Jennifer Stewart (the "Release Package"), severed only under MFIPPA sections 8(1)(i) and 14(1).
- 1.3 Every material fact alleged below is sourced to a specific page of the Release Package or to a specific entry in the City's Lobbyist Registry, both of which are independently verifiable. A limited amount of contextual background, identified as such where it appears, draws on other public sources, which are cited at the point of reliance. The registry was searched on May 22, 2026 and re-verified on June 3, 2026 for the purpose of this letter; no relevant filings were added between those two dates. Where the record permits more than one inference, we have flagged the matter as discretionary rather than as an apparent breach.
- 1.4 We ask that the Registrar exercise the powers conferred on her by the by-law to determine whether the conduct described, viewed against the published rules, constitutes a contravention; and, where it does, to issue the sanctions provided for in the Code.

02 / PARTIES

- 2.1 **Syntax Strategic Inc.** ("Syntax"), 411 Donald B. Munro Drive, Carp, Ontario K0A 1L0. Government-relations and communications firm.
- 2.2 **Jennifer Stewart**, Founder and Chief Executive Officer of Syntax. Holds an active in-house lobbyist registration with the City of Ottawa, last reviewed within the periods covered below.
- 2.3 **Mackenzie Houston**, identified in the Release Package as Senior Director, Syntax. No lobbyist registration on file with the City of Ottawa as of June 3, 2026.
- 2.4 **Jennifer Madigan**, Chief Operating Officer of Syntax. No lobbyist registration on file with the City of Ottawa as of June 3, 2026.
- 2.5 **Jonelle Istead**, at material times a Principal of Syntax. Held consultant lobbyist registrations relevant to two of the matters discussed below.
- 2.6 **Public office holders** referenced in the record include Mayor Mark Sutcliffe, Chief of Staff Mathieu Gravel, Director of Communications Tahera Mufti, Press Secretary DG Stringer, and Communications Officer Rachel Bender Kerbel, all of the Office of the Mayor.

03 / THE APPLICABLE PROVISIONS

- 3.1 **By-law No. 2012-309, Lobbyist Registry By-law.** In particular:
 - (a) the Section 1 definition of "lobby" and the corresponding obligation to register; the City's published guidance confirms that the Lobbyist Registry is intended to record substantive

communication between lobbyists, City staff and public office holders aimed at influencing a decision;

- (b) the Section 6(1) obligation on every lobbyist (consultant or in-house) to file a return for each specific lobbying communication within fifteen (15) business days of the communication occurring, separately identifying the subject matter, the client, the persons lobbied, and the date;
- (c) the absence of any 20 per cent or de minimis threshold; all lobbying must be reported;
- (d) Section 6(7), which states in plain terms that "a person who lobbies as defined by the By-law is subject to the By-law whether they are registered or not."
- (e) the January 2023 amendment to the by-law, which deleted former Clause 4(i). That clause had exempted from the by-law "communication with a public office holder by an individual on behalf of an individual, business or organization in direct response to a written request from the public office holder." Since the deletion took effect, that exemption no longer exists. A communication does not fall outside the by-law merely because the public office holder, rather than the lobbyist, initiated the contact.

3.2 **Lobbyists' Code of Conduct.** In particular:

- (a) **Section 6(3) (Gifts, Benefits and Hospitality).** "Lobbyists with active lobbying registrations, their registered clients or their employees shall not, directly or indirectly, offer or provide any gift, benefit or hospitality to Members of Council or their staff."
- (b) **Section 6(2) (Conflict of Interest).** "Lobbyists shall not knowingly place public office holders in a conflict of interest or in breach of the public office holders' codes of conduct or standards of behaviour."
- (c) **Section 6(1) and Sections 4 and 5 (Improper Influence; Information and Confidentiality; Competing Interests).** Lobbyists shall avoid both the deed and the appearance of impropriety, shall not use confidential information or insider relationships to the disadvantage of their client or the City, and shall not represent conflicting or competing interests without informed written consent.

- 3.3 **Sanctions.** Section 11(1) authorises an escalating compliance scheme beginning with a Letter of Direction and a compliance agreement. Section 11(2) sets out temporary communication bans: one month for a first breach; three months for a second; and a sanction in the Registrar's discretion for a third. Section 10 confers on the Integrity Commissioner the express responsibility for conducting investigations or inquiries to determine whether contraventions of the by-law have occurred. The Complaint Protocol attached to the by-law, at Section 1, authorises a member of the public to request such an inquiry.

04 / APPARENT BREACHES

We respectfully submit that the Release Package, read against the registry, discloses the following apparent breaches.

4.1 Apparent Breach #1, Failure to file returns and lobbying without registration: the Le Germain / Alt Properties client engagement

PROVISION INVOKED

s. 6(1) (15-business-day filing obligation) and the underlying obligation to register lobbying activity.

Particulars.

- (a) Between March 31, 2026 and April 23, 2026, Mackenzie Houston of Syntax conducted what on the face of the record is consultant lobbying on behalf of Le Germain Hotels and Alt Properties in relation to the grand opening of the Alt Hotel Ottawa Airport.
- (b) On April 1, 2026, Ms. Houston wrote to Tahera Mufti, Director of Communications to the Mayor, expressly "on behalf of Le Germain and Alt Properties," requesting "the presence of Your Worship, Mark Sutcliffe, at the grand opening of the Alt Hotel Ottawa Airport" with "special remarks at 6:00 p.m." (Release Package, A0059316_5-00026.)
- (c) On April 2, 2026, Rachel Bender Kerbel of the Mayor's Office responded that she would look at the Mayor's availability and respond (A0059316_4-00025).
- (d) On April 20, 2026, Ms. Bender Kerbel confirmed that "Mayor will attend. Jen Stewart discussed with my colleague Tahera that mayor will be giving remarks. Can you please share key messaging and any important information to inform the remarks?" The message was copied to DG Stringer, Tahera Mufti, and Michael Bhardwaj of the Mayor's Office (A0059316_3-00024).
- (e) On April 21, 2026, Ms. Houston transmitted to the Mayor's Office the key messages the Mayor was to deliver, in the form of six bulleted talking points: that Germain Hotels marked an important milestone with the official opening of the Alt Hotel Ottawa Airport, its 20th property in Canada; that the hotel was the first in the capital directly connected to the Ottawa International Airport by a fully enclosed walkway; that it features 178 guest rooms; that it was important for the Ottawa business community; that it represented an investment in Ottawa's tourism industry; and that Germain was recognized as one of the 50 best-managed companies in the country (A0059316_2-00023). The communication confirmed the Mayor's 5:45 p.m. arrival and Ms. Houston as "the main on site contact."
- (f) On March 31, 2026, Mr. Gravel forwarded the event invitation to the Mayor with the note "You have time in your schedule to go to this. I'd go as well" (A0059309_1-00007).
- (g) The event took place on April 23, 2026, with the Mayor in attendance and delivering remarks drawn from the materials supplied by Syntax.

- (h) As of June 3, 2026, a search of the City of Ottawa Lobbyist Registry returns no registration for Mackenzie Houston in any capacity, and no return filed by any Syntax representative naming Le Germain Hotels, Alt Properties, or the Alt Hotel Ottawa Airport as the client or subject matter of lobbying activity directed at the Office of the Mayor.

Filing deadline analysis. Counting fifteen business days from the latest substantive communication of April 23, 2026 (the event itself), and excluding weekends, the registration deadline was Thursday, May 14, 2026. Victoria Day (Monday, May 18, 2026) falls after that date and does not extend the count. As of the date of this letter, the deadline has passed by more than thirteen business days.

Submission. On the face of the record, the conduct meets the by-law's definition of lobbying: it is a substantive communication with a public office holder, on behalf of a paying client, aimed at securing an action by that office holder (a public Mayoral appearance and the delivery on the record of pro-client messaging). It was directed by Syntax personnel; it required, and obtained, the Mayor's time, his office's coordination, and his use of supplied talking points; and it produced a tangible client benefit at a commercial launch.

Relief sought. A finding that Syntax (through Mackenzie Houston, and with the involvement of Jennifer Stewart as documented at A0059316_3-00024) lobbied the Office of the Mayor without registering and without filing a return within the time required by Section 6(1); and the imposition of the sanctions prescribed by Section 11 of the by-law and the Code of Conduct.

4.2 Apparent Breach #2, Lobbying without registration: the steered Mayoral business walkabout, June 25 to 27, 2025

PROVISION INVOKED

Section 1 (definition of "lobby") and the Section 6(1) registration obligation.

Particulars.

- (a) On June 25, 2025, Jennifer Madigan, Chief Operating Officer of Syntax, sent the Mayor's Office a curated list of seven Carp-area businesses for the Mayor to "drop into" the following day, complete with opening hours: Ridge Rock Brewing Company, Carp Custom Creamery, The Swan at Carp, The Carp Bakery, Carp Foodliner, Giacinto's Barbershop, and Makatew Workshops (Release Package, A0059319_2-00042).
- (b) The list was suggested by Ms. Madigan in her capacity as a Syntax executive, on an internal Syntax email signature; it was transmitted to a senior member of the Mayor's office (Ewa Celinski, on behalf of the Chief of Staff) via Ms. Mufti (A0059319_3-00043).
- (c) The Mayor's Office subsequently arranged a business and seniors' residence drop-by with Councillor Kelly (A0059319_1-00041).
- (d) Jennifer Madigan has no lobbyist registration on file with the City of Ottawa as of June 3, 2026.

Submission. Steering a public office holder to a curated list of named commercial enterprises, on behalf of and through a paid government-relations firm whose CEO holds a related local-board affiliation (Village of Carp Business Improvement Area), falls within the by-law's plain-language definition of lobbying. The communication is substantive; it identifies the persons and properties at issue; it is aimed at securing a specific use of the Mayor's time on commercial premises. It should have been registered.

Relief sought. A finding that Ms. Madigan lobbied without registration on or about June 25, 2025; in the alternative, a determination by the Registrar as to whether the activity required registration, with reasons.

4.3 Apparent Breach #3, Hospitality and benefit to public office holders: Code of Conduct Section 6(3)

PROVISION INVOKED

Section 6(3) of the Code of Conduct, which prohibits the offer or provision of any gift, benefit, or hospitality to Members of Council or their staff by lobbyists with active registrations, their registered clients, or their employees.

Particulars. The Release Package records the following, while Jennifer Stewart held an active in-house Syntax registration and while Jonelle Istead held active consultant registrations on behalf of Syntax clients:

- (a) **September 10, 2025, "Lunch with the Mayor & Syntax team."** Ms. Stewart accepted a calendar invitation, sent from the Mayor's side, to a lunch with Mayor Sutcliffe and the full Syntax team (Release Package, A0059308_1-00006).
- (b) **October 28, 2025, "Lunch with Mat."** Ms. Stewart organized lunch with Chief of Staff Mathieu Gravel at Fratelli Restaurants, Kanata, 12:00 to 1:30 p.m. (A0059314_1-00020).
- (c) **November 28, 2025, "Lunch with Mat."** Ms. Stewart organized lunch with Mr. Gravel at Fratelli Restaurants, Kanata, 11:30 a.m. to 1:00 p.m. (A0059315_1-00021). Subsequently rescheduled to January 2026 by Jamie Contarini of Syntax (A0059325_1-00077 to A0059325_2-00078; A0059329_1-00099 to A0059329_2-00100).
- (d) **August to September 2025, recurring "Lunch with Mat" scheduling.** Syntax-side scheduling for a recurring lunch series with Mr. Gravel runs across pages 51 to 86 of the Release Package, approximately thirty-six pages of email correspondence (A0059321_1-00051 to A0059325_10-00086), organized by Syntax personnel including Ms. Stewart, Devon Larock, Jamie Contarini, and Mr. Gravel's executive assistant.
- (e) **June 17, 2025, Syntax 15-year anniversary reception at La Terrasse.** Mayor Sutcliffe attended the reception hosted by Syntax. The City of Ottawa issued a proclamation honouring Syntax for the occasion, prepared in cooperation with Ms. Madigan (A0059320_1-00044 to A0059320_7-00050).

Submission. Section 6(3) is drafted in absolute terms: no gift, no benefit, no hospitality, directly or indirectly, by lobbyists with active registrations, their registered clients, or their employees. The Release Package documents a sustained pattern of hospitality offered and accepted between Syntax (an organization staffed by registered lobbyists) and the Mayor and his Chief of Staff. Unless the Mayor's Office can demonstrate that the City paid its own way at each meal and event, Section 6(3) has been engaged on multiple occasions.

Relief sought. A determination by the Registrar, for each of the matters listed above, whether hospitality was offered or provided; and, where it was, a finding of breach of Section 6(3) against the responsible registered lobbyists and the imposition of the sanctions provided.

4.4 Apparent Breach #4, Knowingly placing public office holders in a conflict: Code of Conduct Section 6(2)

PROVISION INVOKED

Section 6(2) of the Code of Conduct, which prohibits a lobbyist from knowingly placing a public office holder in a conflict of interest or in breach of that office holder's own code of conduct.

Particulars.

- (a) On June 17, 2025, the Mayor's Office, in cooperation with Ms. Madigan, prepared and issued a City of Ottawa proclamation in honour of Syntax Strategic's fifteenth anniversary, and the Mayor personally attended the firm's reception at La Terrasse (Release Package, A0059320_1-00044 to A0059320_7-00050).
- (b) On April 23, 2026, the Mayor delivered public remarks on stage at a client launch where Syntax personnel had drafted his talking points (A0059316_1-00022 to A0059316_7-00028).
- (c) By way of contextual background (drawn from public sources outside the Release Package and the registry, per paragraph 1.3), Ms. Stewart is documented in the public record as a former member of the Mayor's 2022 communications team and as the Mayor's former business coach (CBC News, October 21, 2022; Caroline in the Capital, June 17, 2025).

Submission. A registered lobbyist who actively procures a City proclamation in honour of her own firm, and who facilitates her firm's drafting of remarks the Mayor delivers at a paying client's event, places the public office holder in a position that is reasonably perceived as a conflict between the public office and the lobbyist's private interest. Whether the Mayor's own code of conduct is engaged is a separate matter for the Integrity Commissioner in her parallel capacity; what is squarely before the Registrar is the lobbyist's obligation not to place the office holder in that position.

Relief sought. A determination that the conduct described placed the Mayor in a conflict of interest within the meaning of Section 6(2) of the Code, and the imposition of the sanctions provided.

4.5 Apparent Breach #5, Incomplete return: Capital Region Resource Recovery Centre (CRRRC), April 1 and April 9, 2025

PROVISION INVOKED

Section 6(1), which requires each return to identify the persons lobbied and the date of the communication.

Particulars.

- (a) On April 1, 2025, Ms. Istead filed a registration under her consultant lobbyist file for the Taggart Group and Miller Group, subject "To provide a project update regarding the Capital Region Resource Recovery Centre," identifying the persons lobbied as Mr. Gravel (Chief of Staff) and the Mayor. The entry remained in this form when the registry was searched on June 3, 2026.
- (b) The April 9, 2025 meeting that followed (Release Package, A0059304_1-00002) was attended by Ms. Istead and Michelle Taggart on the client side, and on the City side by Mathieu Gravel, Brett Byers (Mayor's Office staff), Alain Gonthier (General Manager, Public Works), and Steve Box (City Manager's Office). The Mayor did not attend; Mr. Gravel took the briefing on his behalf (A0059317_5-00033).
- (c) The registry record for the file identifies only Mr. Gravel and the Mayor as persons lobbied. It does not identify Mr. Byers, Mr. Gonthier, or Mr. Box, each of whom was a public office holder participating in a lobbying communication. Mr. Gonthier, as General Manager of Public Works, is a Named Public Office Holder within the meaning of the by-law, which places all General Managers and their direct reports in that category.

Submission. Each person lobbied must be separately disclosed. The return as filed appears incomplete. The omission is material because two of the three undisclosed attendees were senior operating officials whose subsequent involvement in the CRRRC file would be of public interest. It is more serious still as to Mr. Gonthier: the effect of the omission is that the return fails to disclose a lobbying communication with a Named Public Office Holder, the very category the by-law singles out for the highest level of transparency.

Relief sought. A direction that the return be corrected to include all persons present at the April 9, 2025 meeting at which a lobbying communication occurred.

05 / MATTERS IN THE REGISTRAR'S DISCRETION

We respectfully invite the Registrar to make a determination on the following matters, which on the face of the record we have not characterized as apparent breaches but which we believe call for the Registrar's reasoned consideration.

- 5.1 **The "Civic Pride" working group, February 24, 2023** (Release Package, A0059305_1-00003). Ms. Stewart attended an internal Mayor's Boardroom strategy meeting alongside Colette Watson (Rogers), Cyril Leeder, Karla Briones, Don Masters, Adam Miron, Rob Ashe, David Coletto, Jeff Westeinde, and Bob Plamondon. The Registrar may wish to determine whether attendance and contribution at such a meeting constitutes lobbying activity within the meaning of the by-law, given the influence such advisory bodies exercise over subsequent municipal decisions.
- 5.2 **The Carp Village Harvest Supper invitation, August 25, 2023** (Release Package, A0059312_1-00015 to A0059312_2-00016). Ms. Stewart wrote to the Mayor's Office in her capacity as Chair of the Village of Carp Business Improvement Area, an affiliation she has disclosed on her in-house lobbyist file. The Registrar may wish to confirm whether such BIA-capacity correspondence falls inside or outside the by-law on the facts.
- 5.3 **Coordination of the Mayor's appearance at the Carp businesses on June 26, 2025.** Whether the steering described in 4.2 above amounts to lobbying or to the legitimate exercise of a BIA chair's role is in part a discretionary call. We have characterized it as an apparent breach because the email was sent on Syntax letterhead, in Ms. Madigan's Syntax-executive capacity, not under any BIA banner.
- 5.4 **The completeness of Ms. Stewart's in-house registration.** A search of the registry on June 3, 2026 identifies only two activity entries in Ms. Stewart's name: a May 16, 2024 communication with the Mayor and Councillor Kelly, and a July 23, 2024 community-engagement entry for the BESS project in Ward 5. The Release Package documents a higher cadence of Mayor and Chief-of-Staff contact than the registry reflects. The Registrar may wish to determine whether the registration's activity log is current and complete under the periodic-review obligation in Section 6(6).
- 5.5 **Whether any of the Mayor-Stewart or Stewart-Gravel lunches were lobbying communications.** If they were, returns were required and have not been filed. If they were not, Section 6(3) of the Code is engaged in the alternative. The two routes are mutually exclusive; either way, the matter sits squarely within the by-law and the Code. We note for completeness that the September 10, 2025 lunch was extended from the Mayor's side and accepted by Ms. Stewart (A0059308_1-00006), and that the Alt Hotel invitation reached the Mayor by a forward from within his own office (A0059309_1-00007). Before the January 2023 deletion of Clause 4(i), a communication made in direct response to a written request from a public office holder could be argued to fall outside the by-law. Since that deletion, that argument is no longer available, and a contact initiated by the office holder is treated no differently from any other.

06 / SPECIFIC REQUESTS

We ask the Registrar to:

- (a) open a formal investigation into the matters set out at paragraphs 4.1 through 4.5 above;
- (b) make determinations on the discretionary matters at paragraphs 5.1 through 5.5;
- (c) where breaches are found, impose the sanctions provided by Section 11 of the by-law and the Code of Conduct, beginning with the first-breach communication ban and escalating as the by-law permits for any pattern of repeated conduct;
- (d) require corrective filings to bring the public registry into a complete and accurate state;
- (e) publish her findings, reasons, and any sanctions through the ordinary channels (the registry, the Notices and Compliance page, and the Commissioner's annual report), so that members of the public can satisfy themselves that the rules apply equally regardless of the closeness of the relationship between any lobbyist and any public office holder.

07 / CLOSING

- 7.1 The Lobbyist Registry exists to make visible the contacts that shape public decisions. When the rules are followed, the registry does that work without fanfare. When the rules are not followed, only the Registrar can restore the transparency the by-law was written to guarantee.
- 7.2 We have set out the record above in the form in which the City itself released it, and have asked the Registrar to apply her own rules to it. We will assist in any further particulars she requires.

Ottawa deserves better.

Yours respectfully,



Alex Lawson

Candidate for Mayor of Ottawa
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A / SCHEDULE A, RECORD OF COMMUNICATIONS IMPLICATED IN THE APPARENT BREACHES

The tables below list every communication implicated in the apparent breaches at paragraphs 4.1 to 4.5, cross-referenced against the City of Ottawa Lobbyist Registry as searched on June 3, 2026. Source for every date and page reference is Release Package A-2026-00384.

A.1 Breach #4.1, Le Germain / Alt Properties

#	DATE	COMMUNICATION	SYNTAX-SIDE	MAYOR'S OFFICE / CITY	CLIENT / INTEREST	RELEASE PAGE ID	REG.?
1	2026-03-31 to 2026-04-01	Email pitch: request for Mayor's presence and remarks at Alt Hotel Ottawa Airport grand opening, April 23	Mackenzie Houston (Senior Director, Syntax)	Tahera Mufti, Rachel Bender Kerbel, DG Stringer; forwarded to Mayor by Mathieu Gravel ("I'd go as well.")	Le Germain Hotels / Alt Properties	A0059309_1-00007 to A0059310_3-00012; A0059316_4-00025 to A0059316_7-00028	No
2	2026-04-02 to 2026-04-21	Email coordination: confirmation of Mayor attendance, 5:45 p.m. arrival, 6:00 p.m. remarks; Syntax-supplied key messages for Mayor's remarks; "Jen Stewart discussed with my colleague Tahera that mayor will be giving remarks."	Mackenzie Houston	Rachel Bender Kerbel, Tahera Mufti, DG Stringer, Michael Bhardwaj	Le Germain Hotels / Alt Properties	A0059316_1-00022 to A0059316_7-00028	No
3	2026-04-23, 17:00 to 19:00	Public event: Mayor attended Alt Hotel Ottawa Airport grand opening and delivered remarks using Syntax-supplied key messages	Mackenzie Houston (on-site contact); Syntax team	Mayor Mark Sutcliffe and Mayor's Office staff	Le Germain Hotels / Alt Properties	A0059309_1-00007 to A0059316_7-00028	No

Registry status. Mackenzie Houston is not registered as a lobbyist with the City of Ottawa in any capacity (search of June 3, 2026). No return on file naming Le Germain Hotels, Alt Properties, or the Alt Hotel Ottawa Airport as client or subject matter.

A.2 Breach #4.2, Steered Mayoral business walkabout, Carp, June 25 to 27, 2025

#	DATE	COMMUNICATION	SYNTAX-SIDE	MAYOR'S OFFICE / CITY	CLIENT / INTEREST	RELEASE PAGE ID	REG.?
4	2025-06-25 to 2025-06-27	Email: curated list of seven Carp-area businesses for the Mayor to "drop into" the following day, with opening hours (Ridge Rock Brewing, Carp Custom Creamery, Swan at Carp, Carp Bakery, Carp Foodliner, Giacinto's Barbershop, Makatew Workshops)	Jennifer Madigan (COO, Syntax); Jennifer Stewart (a recipient on the originating connecting email, A0059319_3-00043)	Tahera Mufti, Ewa Celinski (on behalf of the Chief of Staff)	Village of Carp area businesses	A0059319_1-00041 to A0059319_3-00043	No

Registry status. Jennifer Madigan is not registered as a lobbyist with the City of Ottawa in any capacity (search of June 3, 2026).

A.3 Breach #4.3, Hospitality (Code of Conduct Section 6(3))

#	DATE	COMMUNICATION	SYNTAX-SIDE	MAYOR'S OFFICE / CITY	CLIENT / INTEREST	RELEASE PAGE ID	REG.?
5	2025-05-28 to 2025-06-17	Email arrangements and in-person attendance: Mayor attended Syntax Strategic 15-year reception at La Terrasse; City of Ottawa issued proclamation honouring Syntax	Jennifer Madigan; Jennifer Stewart (proclamation recipient)	Tahera Mufti, DG Stringer, Rachel Bender Kerbel, Kimberley Grace, Heather Scott (Protocol Office), Mayor Sutcliffe	Syntax Strategic Inc.	A0059320_1-00044 to A0059320_7-00050	No



#	DATE	COMMUNICATION	SYNTAX-SIDE	MAYOR'S OFFICE / CITY	CLIENT / INTEREST	RELEASE PAGE ID	REG.?
6	2025-08-01 to 2025-08-21	Email: scheduling correspondence for recurring "Lunch with Mat" series with Chief of Staff	Jennifer Stewart, Devon Larock, Jamie Contarini	Ewa Celinski, Mathieu Gravel	(none stated)	A0059321_1-00051 to A0059325_10-00086	No
7	2025-08-19	Calendar: "Lunch with Mat," Stewart, accepted on behalf of Gravel	Jennifer Stewart	Mathieu Gravel	(none stated)	A0059307_1-00005	No
8	2025-09-10	Calendar: "Lunch with the Mayor & Syntax team," Stewart accepted invitation from Mayor Sutcliffe	Jennifer Stewart + Syntax team	Mayor Mark Sutcliffe	(none stated)	A0059308_1-00006	No
9	2025-10-28, 12:00 to 13:30	Calendar: "Lunch with Mat" at Fratelli Restaurants, Kanata; organized by Jennifer Stewart	Jennifer Stewart	Mathieu Gravel	(none stated)	A0059314_1-00020	No
10	2025-11-24 to 2025-11-25	Email rescheduling: Contarini informed Gravel that Stewart would reschedule lunch to January; Celinski tentatively slotted Jan 19, 2026	Jamie Contarini	Mathieu Gravel, Ewa Celinski	(none stated)	A0059325_1-00077 to A0059325_2-00078; A0059329_1-00099 to A0059329_2-00100	No
11	2025-11-28, 11:30 to 13:00	Calendar: "Lunch with Mat" at Fratelli Restaurants, Kanata; organized by Jennifer Stewart	Jennifer Stewart	Mathieu Gravel	(none stated)	A0059315_1-00021	No

Registry status during the period covered. Jennifer Stewart held an active in-house Syntax registration throughout this period. Jonelle Istead held two active consultant registrations on behalf of Syntax clients (Evolugen, March 18, 2025; Taggart / Miller, April 1, 2025). Section 6(3) applies to lobbyists with active registrations, their registered clients, and their employees.

A.4 Breach #4.4, Conflict of interest (Code of Conduct Section 6(2))

#	DATE	COMMUNICATION	SYNTAX-SIDE	MAYOR'S OFFICE / CITY	CLIENT / INTEREST	RELEASE PAGE ID	REG.?
12	2025-06-17	City of Ottawa proclamation in honour of Syntax Strategic's 15th anniversary, prepared in cooperation with Jennifer Madigan; Mayor attended Syntax reception at La Terrasse (see also row 5)	Jennifer Madigan; Jennifer Stewart	Mayor Sutcliffe; Mayor's Office Protocol staff	Syntax Strategic Inc.	A0059320_1-00044 to A0059320_7-00050	No
13	2026-04-23	Mayor delivered public remarks at a Syntax-client launch using Syntax-supplied talking points (see also row 3)	Mackenzie Houston; Jennifer Stewart (per A0059316_3-00024)	Mayor Sutcliffe	Le Germain Hotels / Alt Properties	A0059316_1-00022 to A0059316_7-00028	No

Background context (public sources outside the Release Package and registry, per paragraph 1.3). Jennifer Stewart is documented in the public record as a former member of the Mayor's 2022 communications team and as the Mayor's former business coach (CBC News, October 21, 2022; Caroline in the Capital, June 17, 2025).

A.5 Breach #4.5, CRRRC incomplete return

#	DATE	COMMUNICATION	SYNTAX-SIDE	MAYOR'S OFFICE / CITY	CLIENT / INTEREST	RELEASE PAGE ID	REG.?
14	2025-04-01	Email outreach: project update request regarding the Capital Region Resource Recovery Centre	Jonelle Istead (Principal, Syntax)	Mathieu Gravel (Chief of Staff)	Taggart Group + Miller Group	A0059317_1-00029 to A0059318_6-00040	Yes (filed same day)

#	DATE	COMMUNICATION	SYNTAX-SIDE	MAYOR'S OFFICE / CITY	CLIENT / INTEREST	RELEASE PAGE ID	REG.?
15	2025-04-09, 16:30 to 17:00	Meeting (MS Teams + Heritage Boardroom 2810H): CRRRC briefing. Mayor invited but did not attend; Gravel took the briefing on his behalf.	Jonelle Istead, Michelle Taggart	Mathieu Gravel (organizer), Brett Byers (Mayor's Office staff), Alain Gonthier (General Manager, Public Works), Steve Box (City Manager's Office)	Taggart Group + Miller Group	A0059304_1-00002; A0059317_1-00029 to A0059318_6-00040	Yes (filed Apr 1, 2025), but incomplete

Registry entry (Jonelle Istead, consultant lobbyist, filed April 1, 2025).

- Subject matter: Planning and Development.
- Description: "To provide a project update regarding the Capital Region Resource Recovery Centre."
- Persons lobbied (as filed): Mathieu Gravel, Chief of Staff; Mark Sutcliffe, Mayor.
- Persons present at the April 9, 2025 meeting but not disclosed in the registry: Brett Byers, Alain Gonthier (General Manager, Public Works, a Named Public Office Holder under the by-law), Steve Box.

B / SCHEDULE B, SOURCES

1. City of Ottawa, MFIPPA File A-2026-00384, decision letter dated May 19, 2026, and Release Package (100 pages).
2. City of Ottawa, Lobbyist Registry, searches conducted May 22, 2026 and re-verified June 3, 2026 for: Stewart, Istead, Larock, Madigan, Houston, Contarini. lobbyist.ottawa.ca/search/searchlobbyist.aspx
3. By-law No. 2012-309, *Lobbyist Registry By-law*, City of Ottawa. ottawa.ca/en/living-ottawa/laws-licences-and-permits/laws/laws-z/lobbyist-registry-law-no-2012-309
4. *Lobbyists' Code of Conduct*, City of Ottawa (forms part of By-law No. 2012-309). ottawa.ca/en/city-hall/open-transparent-and-accountable-government/lobbyist-registry/lobbyists-code-conduct
5. *Notices and Compliance*, City of Ottawa Lobbyist Registry. ottawa.ca/en/city-hall/open-transparent-and-accountable-government/lobbyist-registry/notices-and-compliance
6. City of Ottawa, *Post-employment Prohibitions on Lobbying*, Lobbyist Registry interpretation bulletin (setting out the Named Public Office Holder category, which includes all General



Managers and their direct reports). ottawa.ca/en/city-hall/open-transparent-and-accountable-government/lobbyist-registry/lobbyist-registry-law-and-reports/interpretation-bulletins/post-employment-prohibitions-lobbying

7. CBC News, Ottawa, October 21, 2022, reporting Jennifer Stewart's role on Mayor Sutcliffe's 2022 communications team (contextual background, per paragraph 1.3).
8. *Caroline in the Capital*, June 17, 2025, account of the Syntax Strategic fifteenth-anniversary reception (contextual background, per paragraph 1.3).