



ADR
CHAMBERS

Integrity Commissioner Office
for the Toronto District School Board

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September 29, 2025

SENT BY EMAIL TO:

Complainants 1, 2, and 3

- At their private email addresses

AND TO:

Trustee Alexandra Lulka Rotman

- At her private email address

AND TO:

TDSB Supervisor Rohit Gupta

c/o Denise Joseph-Dowers, Senior Manager, Governance and Board Services

Re: IC-35511-0425, IC-35514-0425, IC-35515-0425
Code of Conduct Complaints – re: Lulka Rotman

INTRODUCTION

The Integrity Commissioner Office (“Office”) for the Toronto District School Board (“TDSB” or “Board”) is responsible for assisting the Board in maintaining public accountability by enforcing its policy P075 – Board Member Code of Conduct (“Code”), including investigating and reporting on complaints made thereunder pursuant to Procedure 708 – Complaint Protocol (“Complaint Protocol”). I have served as Integrity Commissioner (“IC”) for the TDSB since February 2022. Public school boards in Ontario are subject to the *Education Act*¹ and its Regulations, and sections 218.1 to 218.3 of the Act

¹ *Education Act* - <https://www.ontario.ca/laws/statute/90e02#BK206>

and Regulations 312/24² and 306/24³ govern the Code of Conduct and investigative requirements applicable to all Ontario school boards.

This matter falls under new *Education Act* provisions that came into force on January 1, 2025. Among other things, the updated legislation now mandates that only the Integrity Commissioner determines whether a Member (“Trustee”) breached the Code of Conduct. The IC now also has statutory authority respecting the application of sanction(s) if a finding of a Code contravention is made. The Board no longer has decision-making authority over either aspect of the outcome to a complaint.

COMPLAINT AND INQUIRY PROCESS

Three (3) members of the public (“Complainants”) filed separate complaints (“Complaints”) with the Board on February 24, March 21, and April 4, 2025, respectively, concerning the conduct of Trustee Alexandra Lulka Rotman (“Trustee Lulka Rotman”, or “Respondent”). The matters were not resolved at the Board level and, in accordance with subsection 218.3(3)(b) of the *Education Act*, the Complaints were forwarded to my Office by the Board Chair on April 7 and April 8, 2025. I note that there was a delay in referring the February 24 matter to my Office because the Board was still operationally transitioning its procedures to align with the new legislative requirements, and confusion around the transition also led the Board to filing the April 4 complaint prior to the expiry of the mandatory waiting period. However, I do not consider there to have been any prejudice arising from those delays, and the subject matter of all three complaints was predominantly identical. It was abundantly evident throughout this process that these matters could not be resolved through informal means.

Upon receipt of the Complaints, I immediately commenced a preliminary review, and determined that they passed the threshold for proceeding – i.e., each was properly filed, and raised issues appearing to warrant further inquiry. Following receipt of signed Consent and Confidentiality Agreements, a copy of each Complaint was provided to Trustee Lulka Rotman on April 15, 2025, with a request for her Response within ten (10) days. The Trustee requested a lengthy extension owing to extenuating personal circumstances and being on a leave of absence, which I considered legitimate and thus granted. My Office notified the Complainants of the delay. Trustee Lulka Rotman filed an initial Response on May 26, 2025, following which I followed up with her for more

² O. Reg. 312/24 – *Members of School Boards – Code of Conduct*

<https://www.ontario.ca/laws/regulation/240312>

³ O. Reg. 306/24 – *Integrity Commissioners and Process for Alleged Breaches of the Code of Conduct*

<https://www.ontario.ca/laws/regulation/240306>

information, which she provided a little more than two weeks later. Her Responses were then sent to the Complainants, with requests for any Reply submissions they wished to make. Replies were received between June 26 and July 6 and were in turn provided to Trustee Lulka Rotman.

The Board was placed under Ministry supervision on June 27, 2025. Trustees no longer had access to their email as of July 21, 2025, which made communication difficult thereafter. These procedural interruptions, the additional time granted for Responses, the summer vacation period, and the fact that I had to address three separate (even if similar) Complaints led to this inquiry taking longer than is standard for a single inquiry. By comparison, a similar sole complaint concerning a different Trustee was filed around the same time but was concluded in mid-July. The delay in concluding this matter posed no prejudice to any participant, but I acknowledge some of the parties' annoyance at having to wait longer than normal for this conclusion.

Throughout this investigation, I followed a process intended to ensure fairness to all sides. I have considered all the evidence before me dispassionately and weighed it on a balance of probabilities. The process included a review of all filed submissions, independent research, and a review of the Board meeting at which the impugned incident occurred. I opted not to conduct interviews with the parties, as the written record and video evidence were sufficient to determine the outcome to this matter.

Limited Scope

The matters at issue arise within an unpleasant geopolitical climate that has led to an unmistakably marked increase in antisemitism, which is contextually relevant. That said, I must make clear that my investigation is limited in scope and only addresses whether Trustee Lulka Rotman breached the Board's Code of Conduct. My findings are not a social commentary on local or global concerns, nor do I hold myself out as any kind of universal arbiter of morality. I merely arbitrate the Code of Conduct, and whether its rules of conduct were violated. The intent of Code enforcement is not to police politics or personal opinions, but to guide those subject to the Code to adhere to its provisions.

THE PARTIES AND THEIR POSITIONS

The Complainants are all members of the community who observed the incident in question. Complainant #2 self-identified as a member of an organization called "Toronto Jewish Families". Complainant #3 self-identified as a member of Board staff.

Trustee Lulka Rotman is a Member of the Board, representing Ward 5 – York Centre, and identifies as a member of the Jewish community.

Complaints

The Complainants all detailed comments that Trustee Lulka Rotman made at the continuation of the Board’s Planning and Priorities Committee meeting on February 13, 2025. The initial portion of the meeting, which was scheduled for and took place the previous day (February 12, 2025), featured hours of delegations from dozens of community members speaking about Agenda item 8.1 – *Update: Affirming Jewish Identities and Addressing Antisemitism and the Combatting Hate and Racism Strategy*⁴ (the “Staff Report”). Trustee Lulka Rotman’s impugned comments on February 13 were as follows (verbatim):

“I want to start by acknowledging and thanking our Jewish Heritage Committee volunteers for all the incredible work that they do. I want to thank Ronnie and Debbie for your exceptional work on this report. This report is honestly the first time in my eight years at the Board that I have ever truly felt seen by a staff report. I personally experienced antisemitism growing up but nowhere near the amount I’ve experienced within my time here at the Board. Before becoming Trustee, I might have told you antisemitism in Toronto was somewhat minimal; but what I’ve witnessed these last eight years, what I’ve seen in our schools, what I’ve heard from my community, and what I have experienced personally in my time here, has truly opened my eyes to the level of hate that surrounds my community, in a way that I will not be able to unsee – to the point where my own family has had many conversations as to whether it is safe to continue to raise our family here in Toronto. There have been many times where it has been extremely painful to stand in the Boardroom, or where I have been honestly just embarrassed to be associated with the TDSB in any way. Last night may be the most offensive experience I have had to sit through as a Jewish woman on this Board. The amount of antisemitism that was on blatant display last night was gut-wrenching. Not only did we hear an overwhelming number of factual and historical inaccuracies, but full-on antisemitic tropes including blood libel, global Jewish power, and holocaust inversion. Notably, we heard from one delegate who claimed that she was a

⁴ [8.1 – Update: Affirming Jewish Identities and Addressing Antisemitism and the Combatting Hate and Racism Strategy](#)

relative of well-known holocaust survivor [Mr. G.]⁵. I was contacted by [Mr. G.]’s immediate family, who asked me to clarify that this individual is not known to the family, and they are disgusted that this delegate would try to use his name to try to justify her hateful politics. [Mr. G.] was a proud Zionist who helped Jews immigrate to Israel and visited often, and he would be horrified that his name was being violated in this way. I implore my colleagues to recognize that while we heard loud voices last night, they represent only a miniscule percentage of the Jewish community. You heard from 60-70 people last night who came here out of hatred and animosity, many of whom are not Jewish or do not reside in Toronto. I can show you 50,000 who came out to the UJA Walk with Israel in Toronto last Spring, who stood together in unity and pride and solidarity. Our community doesn’t often agree on much, but the core Zionist belief in Jewish right to self-determination is one area where over 90% of Jews in Canada stand united – and the fact that so many non-Jewish people feel so comfortable coming here to speak over Jews tells you everything you need to know about the current state of antisemitism in our Board and in our city. However, reading this report was honestly the first time where I felt a little bit of hope – where I feel like we finally have the chance to do something good, to take baby steps in the right direction. The road will be long, but I am encouraged by what I see before us. This report captures what community has told us with respect to fighting antisemitism in our schools, many of which I have heard from my own constituents in my community in York Centre. I am pleasantly surprised to see a report of this candour. For the first time, we are not tiptoeing around the problem in our Board. In June, Director Russell-Rawlins promised that this Board, that the antisemitism strategy, would look at tackling antisemitism in all its forms, and I am pleased to see that actually materialize in this report. I feel like I can finally start to see the outline of a path forward for this Board, who has come under so much scrutiny around antisemitism in repairing a relationship with the Toronto Jewish community. This report recognizes an important truth about antisemitism – that it shifts and adapts with the times, in order to persist over the last 2,000 years. In biblical times, Jews were hated for our monotheism in a polytheistic world. In medieval times, we were hated for our religion. In the Renaissance, we were hated for our culture. In the 19th and 20th century, we were hated for our race. In today, in 2025, we are hated for our state and our desire for, and expression of, national self-determination and returning to a people on the world stage.

⁵ Though the delegations are matters of public record it is the normal practice of my Office not to publish the full names of community members to protect their privacy. This individual is hereinafter referred to as “Mr. G.” out of respect for privacy only.

Hatred of Jews today is increasingly presented as hatred towards our state and against those who dare to believe in their right to independence as a nation and as a people, and an attempt to criminalize and subvert that expression. That is the latest manifestation of antisemitism as it presents as anti-Zionism. They will tell you they “don’t hate Jews, just Zionists.” Let me translate that for you. They don’t hate Jews; they just hate 9 in 10 Jews. Such a position would not be tolerated toward any other minority community. A strategy to address antisemitism that fails to meaningfully take on anti-Zionist manifestations as outlined and explained in the IHRA handbook – and which poses a threat to the modern community of Jews – would be a catastrophic failure to Jews of today and would skirt around the most pressing and visceral form of hate being faced by Jews at this very moment. There is an inextricable core Zionist spirit within Judaism that situates and ties Judaism to the land of Israel. That is the focus of Zionism and Jewish self-determination, where half of the world’s Jews reside today. Jews pray towards the land of Israel. Half of Jewish biblical commandments intrinsic to Jewish practice are tied to the land of Israel. And Jewish holidays are tied to the land of Israel and its people. Our three major festivals focus on pilgrimage to Jerusalem, and today, Jews of Canada and Toronto celebrate the Jewish holiday of *Tu BiShvat*, the new year for trees in the dead of winter in the aftermath of a literal snowstorm – with barren trees that will not bounce back for months because Judaism isn’t tied to Canadian or European agricultural cycle, but to that of the land of Israel. Jews are taught that we are responsible for one another, including the half of whom that reside in Israel, and it is no wonder that 9 in 10 Jews have an affinity for Israel, the land, and its peoples’ right to exist. This is an inextricable part of our heritage and identity that cannot be taken from us no matter how inconvenient it is to the politics of agitators who showed up last night in a coordinated ambush. And our identity and belonging matters, as does stamping out the hate directed at us for it.”

Trustee Lulka Rotman then joined the list for the second round of comments, and added the following when it was her turn to speak again:

[...] I just want to briefly sum up my remarks. [...] So, to be clear – just picking up where I left off – to exclude a meaningful accounting of how antisemitism manifests as anti-Zionism would mean that a good deal of our community members in the TDSB are experiencing antisemitism today, and would be erased and silenced, and that is unacceptable. In addition, we need to remember that this report before us for receipt is a consolidation of what we heard from community, and that to do anything other than receive the report

would indicate that this body does not take the concerns of the Jewish community or our Jewish students seriously, that we don't care what they have to say, and that once again Jews don't count at the TDSB. [...]

Trustee Lulka Rotman then asked for a recorded vote and noted that she had some questions on the report itself, neither of which impacts this inquiry.

The Complainants submitted the following Complaints, which I also copy and paste verbatim:

Complainant #1

Complainant #1 cited sections 6.9, 6.10, and 6.11 of the Code, commenting:

At the TDSB board meeting on February 13th trustee Lulka-Rotman engaged in antisemitic and anti Palestinian racism when she referred to the approximately 60-70 anti- Zionists who delegated against receiving the report on February 12th, 2025, as being offensive, and said they were motivated by hate and animosity. She accused these delegates who included TDSB employees, members of the Jewish heritage committee, parents, students and community members, including at least one rabbi of holocaust inversion, and of not being really Jewish when she accused them of "speaking over Jews". She said these delegates were outside agitators and were part of a coordinated ambush. This hateful language shows a dangerous bias against Palestinian and anti zionist Jewish people.

Complainant #2

Complainant #2 formally cited Code section 6.10.1 in his complaint form (although he also cited 6.9.1 in his comments) and stated the following:

1. I delegated at the February 12 meeting of the Planning and Priorities Committee representing Toronto Jewish Families, a grassroots organization that advocates for safe and inclusive school communities free from antisemitism, anti-Palestinian racism, and other forms of oppression. I delegated on the subject of the update to Affirming Jewish Identities and Addressing Antisemitism and Combatting Hate and Racism Strategy. I also reviewed the video documentation of the continuation of the meeting on February 13.

2. I have reasonable and probable grounds to believe [...] Alexandra Lulka Rotman has contravened section 6.9.1 of the Board Member Code of Conduct.
3. The particulars are as follows: In the meeting of the Planning and Priorities Committee of February 12, 2025, [there were] 60 – 70 delegates, including myself as a member of Toronto Jewish Families. We addressed the update to Affirming Jewish Identities and Addressing Antisemitism and Combatting Hate and Racism Strategy. In the February 13 continuation of that meeting, Trustee Lulka Rotman verbally attacked delegators saying “you heard from 60, 70 people last night who came here out of hatred and animosity” and characterized delegations as “anti-semitic tropes including blood libel, global Jewish power and Holocaust inversion”. Lulka Rotman also belittled the delegations by suggesting that they contained “an overwhelming number of factual and historical inaccuracies.” These statements are all patently false. She also stated that the voices heard amongst the delegations of February 12 “represent only a miniscule percentage of the Jewish community”. Though anti-Zionist Jews may currently represent a minority of Jews in Toronto, they are far from miniscule in number and further, equity work does not begin with the majority. Jewish anti-Zionism has a history as long as Zionism itself. Lulka Rotman’s accusations are unfounded and contravene article 6.9.1 of the Code of Conduct for Trustees which states that Trustees are “expected to refrain from verbally attacking or belittling those who complain or do not agree with them.” Further, article 6.9.1 also stipulates that Trustees are “to set an example for future leaders who may look to them for guidance and leadership.” Lulka Rotman’s comments do not set such an example.

Complainant #3

Complainant #3 cited Code section 6.10.1:

I delegated at the Planning and Priorities Committee meeting on Feb. 12 on topic 8.1 “Update: Affirming Jewish Identities and Addressing Antisemitism and the Combating Hate and Racism Strategy.” In my delegation, I focused on human rights and the lesson from the Holocaust of “Never Again for Anyone”. I referred to a classroom visit by Holocaust survivor [Mr. G.] in which he admonished bystanders who stayed silent when faced with injustice. In her comments at the continuation of the meeting on Feb. 13 Trustee Lulka Rotman referred to me by referencing my comments about [Mr. G.] and accused me of having “hateful

politics". This statement is a clear example that "maliciously ... injure[s] the professional or ethical reputation ... of Staff Members of the TDSB." Further, the Trustee is not showing "respect for the professional capacities of Staff Members."

The cited sections of the *Code of Conduct* read as follows:

6.9. Conduct at Board and Committee Meetings

- 6.9.1. Members of the Board act in the service of the community. They have the opportunity to set an example for future leaders who may look to them for guidance and leadership. They are expected to respect the procedural rulings of the Chair. They are expected to refrain from verbally attacking or belittling those who complain or do not agree with them. It is vital that Members of the Board conduct themselves with decorum at Board and committee meetings and in accordance with the provisions of Board Bylaws concerning meeting procedures.

6.10. Conduct Respecting Staff Members

- 6.10.1. No Member of the Board will maliciously or falsely injure the professional or ethical reputation, or the prospects or practice of Staff Members of the TDSB, and all Members of the Board will show respect for the professional capacities of Staff Members.

[...]

6.11. Discreditable Conduct

- 6.11.1. All Members of the Board have a duty to treat members of the public, one another, and Staff Members respectfully and without abuse, bullying or intimidation, and to ensure that their work environment is free from discrimination and harassment. This provision applies to all forms of written and oral communications, including via social media.
- 6.11.2. When acting or holding themselves out as a Member of the Board, the member will conduct themselves in a manner that would not discredit or compromise the integrity of the TDSB.
- 6.11.3. When acting or holding themselves out as a Member of the Board, the member will treat persons equally without discrimination based on a person's race,

ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, marital status, family status, disability or socioeconomic status.

Responses

Trustee Lulka Rotman issued a formal Response to each Complaint. The Responses were lengthy – 31, 32, and 33 pages, respectively – and referenced several documents which she included in the appendices. The Responses were substantively similar, although one differed by specifically addressing comments related to Complainant #3 who introduced information about Mr. G., to which Trustee Lulka Rotman (and apparently Mr. G.'s family) took exception. Given the length of Trustee Lulka Rotman's Responses, I have opted to summarize them, rather than copy them in their entirety.

Trustee Lulka Rotman denied violating the Code of Conduct in each case. She explained that her February 13th statement was intended to protect Jewish students, faculty, and staff who face increasing hostility in educational settings for expressing ties to Israel and Zionism. She recounted her personal experience with antisemitism, and the pain caused by the meeting's content (i.e., statements from many delegates), describing it as the most offensive experience she has had as a Jewish woman on the Board. She detailed what she considered antisemitic tropes and falsehoods presented during the meeting, including blood libel and Holocaust inversion. She clarified that she was concerned many non-Jewish delegates spoke on Jewish experiences without having lived them, which she found unacceptable.

Trustee Lulka Rotman referenced that the TDSB report recognized that anti-Zionism has re-emerged as a contemporary form of antisemitism, often manifesting as collectively blaming Jewish individuals for Middle East conflicts, accompanied by antisemitic slogans and intimidation. She cited the IHRA definition of antisemitism adopted by the TDSB, which includes certain anti-Zionist expressions.

Trustee Lulka Rotman asserted that her statement was made in service of the community, to uphold safe and inclusive spaces within the TDSB, and thus was not contrary to the Code. She noted that she was voicing the concerns of Jewish community members (including herself) who were deeply impacted by harmful language they perceived during the meeting. She recounted what she and others considered antisemitic rhetoric and falsehoods in delegation statements, including those equating Zionism with racism and using inflammatory accusations unrelated to the report. She noted the rise in antisemitic incidents in TDSB schools, and what she saw as the Board's failure to protect Jewish students from hostility.

With respect to Code section 6.10.1 – which prohibits malicious or false injury to the professional or ethical reputation of TDSB staff – Trustee Lulka Rotman stated that the meeting was dominated by delegations that largely targeted Israel – labeling the Gaza war as “genocide” and equating Zionism with racism – which she found deeply upsetting given the report's focus on Jewish community concerns. She recounted that she made a clarification during the meeting regarding Complainant #3, who claimed during her delegation to be a relative of Holocaust survivor Mr. G. – whose family reported to her that they didn't know Complainant #3, and that they were disturbed by the misuse of Mr. G.'s name to support anti-Zionist views. She stated that Mr. G.'s immediate family requested the clarification, and she included excerpts of text messages to evidence such, including one message referring to Complainant #3's invocation of Mr. G.'s name as “disgusting” and asking Trustee Lulka Rotman to make a “rebuttal”.

Trustee Lulka Rotman included letters from Jewish organizations condemning the antisemitism at the February 12 meeting and calls for the Board to fully implement the report from groups including the Canadian Antisemitism Education Foundation, Canadian Women Against Antisemitism, Jewish Educators Families Association, Abraham Global Peace Initiative, and the Center for Israel and Jewish Affairs. I find it pertinent to quote from them:

The Canadian Antisemitism Education Foundation commented:

Needless to say the outpouring of antisemitism at last night's TDSB Planning Committee was more than disappointing. It was duplicitous, deceitful and dangerous. Few of the speakers opposing the document which was drafted to support Jewish identity and combat antisemitism, knew anything about current antisemitism which in its latest manifestation is fueled by Islamism and leftist ideologies.

[...]

The majority of speakers were dogmatic and ill informed, and those claiming a Jewish identity were representative of a tiny anti-Zionist minority, not the Canadian Jewish majority. These voices cause confusion and do not add facts, evidence, scholarship to the discussion. They cause harm and must not be allowed to dissuade you from doing the right thing. The Canadian Antisemitism Education Foundation urges that you adopt the report, develop and implement robust plans with Jewish parents and educators that truly represents the Jewish members of TDSB.

[...]

Canadian Women Against Antisemitism sent the following email to Trustee Shelley Laskin on February 13th, which Trustee Lulka Rotman obtained:

At last night's TDSB meeting, where the Board released its Affirming Jewish Identities and Addressing Antisemitism report, Independent Jewish Voices (IJV) and other anti-Zionist groups attended en masse to spread lies and misinformation about Zionism and Israel. These groups weaponized distorted statistics in an attempt to delegitimize the Jewish community's concerns and falsely accused Zionist Jews of being "genocidal colonialists."

IJV falsely claimed that only 51% of Canadian Jews are Zionists, citing the flawed New Israel Fund (NIF) survey. However, what the report actually states is that 94% of Canadian Jews believe in Israel's right to exist—which is the very definition of Zionism. The discrepancy exists because anti-Zionist rhetoric has deliberately turned "Zionist" into a dirty word, leading some Jews to avoid the label despite holding Zionist beliefs. The survey's biased framing confused respondents or pressured them into distancing themselves from the term, making it an unreliable measure of Jewish opinion.

Throughout this attack on Jewish identity, TDSB did nothing to intervene. They allowed blatant Jew-hatred to take place in their public forum, subjecting Jewish attendees to slanderous accusations and failing to stop rhetoric that vilified Zionist Jews and minimized antisemitism. By standing idly by, TDSB became complicit in the emotional distress inflicted upon the Jewish community.

TDSB should be ashamed of itself. This is yet another example of how institutional neglect enables antisemitism to fester, making Jewish students, parents, and staff feel unsafe in the very schools that are supposed to protect them.

[...]

The Jewish Educators and Families Association wrote shortly after 12 a.m.:

Tonight, the TDSB trustee meeting devolved into a seven-hour sideshow and hate-fest, [...].

We are incredibly grateful to the many in our community who stood up to express their views on the urgent need to protect Jewish students, who are currently experiencing record levels of antisemitism. Their voices were desperately needed to keep refocusing the discussion on how the TDSB can and should serve Jewish students—and all students—better.

However, the anti-Zionist movement descended in droves, dominating the discussion with a clearly orchestrated and organized campaign. This effort was driven by some of Canada's most active anti-Israel voices, including individuals and groups who aren't even Toronto residents.

The tone of the evening

Rather than focusing on how to best serve students, the theme of the night was nearly seven hours of incessant hatred and blood libel. Delegations repeatedly leveled false accusations against Israel and Israelis, including claims of:

- Colonialism
- Ethnic cleansing
- Apartheid
- Genocide

Toward the end of the evening, many community members decided to alter their remarks to counter the blatant lies and falsehoods that had been presented earlier [...].

The Director of Education for the Abraham Global Peace Initiative wrote:

I write to you today as the Director of Education for the Abraham Global Peace Initiative (AGPI) to express our deep concern over the events that transpired at last night's TDSB trustee meeting regarding the Affirming Jewish Identities & Addressing Antisemitism report. Rather than serving as an opportunity to reaffirm the safety and inclusion of Jewish students, the meeting was overtaken by a coordinated effort to delegitimize this critical initiative. The framework of Diversity, Equity, and Inclusion (DEI), which is meant to protect all communities, was instead manipulated to justify rhetoric that marginalized Jewish students and dismissed their lived experiences.

[...]

The meeting itself became one of the most troubling displays of institutional antisemitism the Jewish community has witnessed in recent years. Instead of ensuring a respectful and solutions-focused discussion, the TDSB allowed its platform to be used for over seven hours of hateful rhetoric, historical distortions, and outright falsehoods designed to discredit the report. Delegations used inflammatory accusations—such as ethnic cleansing, colonialism, apartheid, and genocide—that were entirely irrelevant to the topic at hand. [...]

The Centre for Israel and Jewish Affairs (CIJA) wrote to the Board on February 13th, stating that “the meeting devolved into a disgraceful display of antisemitism,” where “several delegates used their allotted time to attack the Jewish community.” They continued,

For Jewish parents, staff, and students in the TDSB to witness the meeting become a platform for denialism of antisemitism was appalling – as was the divisive rhetoric around an overseas conflict that should have nothing to do with the TDSB’s responsibility to protect the well-being of students in Toronto.

The CIJA’s letter was signed by representatives from the CIJA, the Friends of Simon Wiesenthal Center, the UJA Federation of Greater Toronto, the Toronto Holocaust Museum, and Allies for a Strong Canada.

Replies

My Office received Replies from all three Complainants.

Complainant #1

Complainant #1 provided lengthy submissions, which I summarize as follows:

Complainant #1 reaffirmed her position that Trustee Lulka Rotman made remarks that were antisemitic, anti-Palestinian, discriminatory, and harmful. She noted that 44 delegates identified as Jewish, with 28 of them also identifying as anti-Zionist, and that these delegates expressed concerns that the proposed policy would suppress criticism of Israel and negatively impact *their* Jewish identity. She further noted that Palestinian delegates and representatives from other communities voiced apprehensions about proposals that they perceived as vilifying and silencing their communities and other supporters of Palestinian human rights. These included members of TDSB staff who presented delegations describing potential harm to Palestinian and anti-Zionist staff and

students (including anti-Zionist Jews). Complainant #1 alleged that Trustee Lulka Rotman's statements against these delegations erased the Jewish identity of anti-Zionist Jewish delegates, selectively prioritizing pro-Israel delegates as representative of all Jews, which she claimed was discriminatory and thus undermined the integrity of the TDSB. Complainant #1 stated:

My complaint is that Trustee Lulka Rotman breached her duties as required by the Code in the following manner:

- She stated that anti-Zionist Jews cause harm to other Jews;
- Her statements suggest that Palestinians and allies (non-Jews) who express criticism of the state of Israel also cause harm to Jews; and
- That anti-Zionist Jews and their allies are inherently antisemitic, and are, in her words "offensive, and motivated by hate and animosity".

Complainant #1 took issue with Trustee Lulka Rotman attacking delegates' statements, asserting:

To suggest that these delegates' comments were in any way harmful, or antisemitic or hateful is utterly dishonest. It is simply a means to demean and insult the delegates and the lived experiences of anti-Zionist Jews, Palestinians and allies.

Complainant #1 cited Trustee Lulka Rotman's use of terms such as "blood libel" and stated such was "horrifically" inappropriate and unsupported by any mention or allusion to such in the delegations.

Complainant #1 additionally took exception to Trustee Lulka Rotman's formal Response to the Complaint and claimed that it was a violation of the Code because it exacerbated the impugned February 13th comments, as well as demonstrating how those impugned comments were a Code violation (as per her Complaint allegations). She noted that Trustee Lulka Rotman referred in her Response to one delegate's comments as "attacking Israel" by accusing it of committing genocide in Gaza. Complainant #1 countered that numerous international organizations have labelled Israel's actions in Gaza as "genocide" and thus Trustee Lulka Rotman's objections were harmful to delegates who also made that claim.

Complainant #1 contested the positions of the various correspondent Jewish organizations cited and relied upon by Trustee Lulka Rotman, claiming that "Her entire defense relies on delegations from groups that have already been shown to cause harm

within the TDSB school community". She cited each one in turn and offered criticisms of their various positions or activities.

Many of Complainant #1's arguments centered on the disagreement over the definitions within and impact of the Staff Report, including the beliefs expressed by Trustee Lulka Rotman compared with the positions and beliefs of delegates. She wrote:

The respondent [Trustee Lulka Rotman] claims: *'I intended to stand with a community that felt targeted, whose safety the Report and the Meeting were meant to uphold. In doing so, I was fulfilling my duty to ensure the school environment is free from harassment and discrimination, as outlined in the Code.'* She also claims the *'statement was not biased against Palestinian and anti-Zionist Jewish People.'* In fact, her statement about the report completely dismisses the information provided over and over by the delegates that the report directly targets Palestinians by seeking to silence and erase them and their experience.

Complainant #1 concluded that Trustee Lulka Rotman's Response showed no remorse and exacerbated harm toward delegates and the TDSB community, damaging public confidence in the Board's ability to facilitate inclusive and safe spaces for all identities.

Complainant #1 included various pieces of correspondence from organizations, such as "Independent Jewish Voices", "Jews Say No to Genocide", "Toronto Jewish Families", and the "Jewish Faculty Network". She also included a list of countries which have declared Israel's actions in Gaza "genocide". I have summarized and quoted from the letters she provided:

On February 10, Independent Jewish Voices wrote to the Board's Planning and Priorities Committee with "grave concerns" about Staff Report, calling it "divisive" and claiming it would create "setbacks to the Board's stated goals of belonging, equity and inclusion for all students." They asked for the report to be sent back for "more wide-ranging and inclusive consultation with diverse Jewish communities and Jews with multiple perspectives" and specifically argued against "conflating anti-Zionism with antisemitism," and claimed that the Staff Report would have a chilling effect on the freedom to express dissent against political ideology and state actions by falsely equating criticism of Israel with discrimination against Jews.

A media statement from Jews Say No to Genocide and Toronto Jewish Families, dated February 14, 2025, referred to the "cynical weaponization of antisemitism as a shield for the state of Israel's actions" and claimed that such was "a reprehensible tactic that actively undermines the fight against genuine anti-Jewish hate." The media release criticized the

statements of the “pro-Israel lobby” which “deliberately distorted ... [the] deputations, falsely labelling defenses of Palestinian human rights as antisemitic attacks.” Jews Say No to Genocide and Toronto Jewish Families claimed that some TDSB Trustees (seemingly in reference to Trustee Lulka Rotman and perhaps others),

... displayed a shocking lack of clarity related to the meaning of anti-Zionism, its difference from antisemitism, and most concerningly blatant disregard for Palestinian life, culture and safety. More disturbingly, trustees even smeared delegations from anti-Zionist Jewish, Palestinian and ally community members without providing any specific examples to back up their harmful assertions ...

The media release went on to make the case for their viewpoints on the Israel-Palestine conflict, the problems they see with the Staff Report and its potential impacts, and the need for the TDSB to address antisemitism without conflating it with anti-Zionism.

A March 31, 2025 letter from the Jewish Faculty Network (a group identifying as representing some 200 Jewish post-secondary faculty and librarians) critiqued the contents of the Staff Report in a manner similar to some of the February 12th delegations, particularly voicing opposition to the conflation of anti-Zionism with antisemitism. The group charged that the TDSB did not engage in “serious” consultation when preparing the Staff Report and claimed that the receipt of such created a “dangerous precedent ... with respect to the conflation of anti-Zionism with antisemitism”. The letter notes that “Many Jewish people have never been Zionists,” while some, “have become anti-Zionist through disillusionment with the process and consequences of creating an ethnostate.” The Jewish Faculty Network noted particularly that it was formed as a group to oppose adoption of the IHRA working definition of antisemitism because of the anti-Zionism / antisemitism conflation problem it perceives as a result from applying that definition.

Complainant #2

Complainant #2’s Reply was the briefer than the other two. He reaffirmed his position that Trustee Lulka Rotman breached the Code by “verbally attacking or belittling those who complain or do not agree with them.” I paste the following excerpts directly from his submissions:

1. Ms. Lulka Rotman has stated in her response to this complaint that her “statement was made in service of the community”. None of our communities are served by Ms. Lulka Rotman’s vitriolic attacks, her belittling, and false accusations. Further, any understanding that a

community was served by her comments (the Jewish Zionist community) suggests clearly that such “service” comes at the expense of another community, (the Jewish anti-Zionist community) which Ms. Lulka Rotman clearly seeks to demean.

2. She belittled the delegators who disagree with her position by declaring that there were “an overwhelming number of factual and historical inaccuracies ...” Her response does not identify a single one (hearsay about the dynamics of [Mr. G.]’s family notwithstanding).
3. She decried what she called “... full-on antisemitic tropes, including blood libel...”. I can say that this attack on the delegators is untrue. As you may know, “blood libel” is an accusation that Jews used the blood of non-Jewish children for Jewish rituals including the making of unleavened bread to be eaten at Passover. It is a myth. The suggestion that I, or any of the other delegators, made such an accusation is not only untrue, but also deeply hurtful. No such accusation was made. Any references to the blood of children that may have been made referred to the blood of Palestinian children being shed in Gaza and reflect media reports from such sources as CBC, the Guardian, NBC, BBC, Haaretz, and NGOs such as Doctors Without Borders, Save the Children, Human Rights Watch, and many, many others.
4. She referred to “loud voices” that “represent only a miniscule percentage of the Jewish community”. Jewish non-Zionism has a history as long as Zionism itself. For example, in the late 19th century, the Jewish Bundists, a large socialist movement organized widely across Europe advancing Yiddish language and culture and deeply disapproving of the attempts to establish a Zionist state. Further, in a November 2024 survey of Jews in Canada, later than the one employed by Ms. Lulka Rotman and conducted by the New Israel Fund, in answer to the question, “Do you consider yourself a Zionist?” 51% answered “yes” while 27% answered “no”, self-identifying as non-Zionist. Non-Zionists are not a minuscule percentage of the Jewish community. Ms. Lulka Rotman’s statement is both a figurative and literal belittling of the many of us who delegated on those evenings, any absence of intent on her part notwithstanding.
5. She attacked delegators stating that “so many non-Jewish people feel so comfortable coming here to speak over Jews”. I do not believe that there was any tally as to how many delegators were Jewish or not, and further,

no one spoke “over” anyone else. More importantly yet, her comment suggests that some members of the public have more right to address one another than others. This attack was very disrespectful.

6. Further, Ms. Lulka Rotman’s words and demeanour do not set a responsible example for future leaders, and so, also a breach of article 6.9.1.

Complainant #3

Complainant #3 provided a seven-page Reply, including appendices. I summarize it, with some direct quotes, as follows:

Complainant #3 emphasized her commitment to fostering inclusive, respectful, and safe learning environments for all students, staff, and communities within the TDSB. She explicitly stated her opposition to antisemitism, anti-Palestinian racism, Islamophobia, and all forms of hate, affirming that her participation in the February 12th committee meeting was guided by those principles and aligned with the TDSB’s Human Rights Policy (P031) and Equity Policy (P037).

Complainant #3 disputed that antisemitism was “on blatant display” during the February 12 meeting, noting that Trustee Lulka Rotman provided no specific examples to substantiate the allegations against her remarks – stating: “At no point did I engage in or endorse antisemitic rhetoric, including the deeply offensive tropes of 'blood libel, global Jewish power, and Holocaust inversion', nor were such statements made by me.” Complainant #3 further asserted that Trustee Lulka Rotman’s claim is false and harmful to the community, and conflicts with her duty under the Code to treat others respectfully.

Complainant #3 critiqued the conflation of antisemitism with anti-Zionism, which she said undermines efforts to address real antisemitism and the TDSB’s equity commitments. She cited the Ontario Human Rights Code, which distinguishes between anti-Zionist viewpoints and antisemitism – stating that anti-Zionism is only antisemitic if Israel is seen as representative of all Jews, rather than legitimate criticism of Israel as a state⁶. Complainant #3 wrote: “Trustee Lulka Rotman’s claim that there was blatant antisemitism among the delegations, including my delegation, is unsubstantiated, hurtful and false.”

⁶ 3.3 Racism, xenophobia, antisemitism and Islamophobia, Ontario Human Rights Code, https://www3.ohrc.on.ca/en/policy-preventing-discrimination-based-creed/3-background#_edn51

With respect to a specific comment relating to Mr. G., Complainant #3 clarified that she invited that individual, who she described as a family friend, to speak to her Grade 8 class in 2017 about his experiences during the Holocaust. She recounted that he described being marched to a train station in Serbia, with neighbours silently watching, which deeply moved her and her students. Complainant #3 explained that during her delegation, a typographical error misspelled her name, which led to his family not recognizing her. Complainant #3 denied using his name to justify “hateful politics,” and asserted that Trustee Lulka Rotman’s comments violated section 6.10 of the Code, which prohibits trustees from maliciously or falsely injuring the professional or ethical reputation of staff members, and requires respect for their professional capacities.

Complainant #3 attached a copy of her remarks to the committee on February 12th. She referenced Mr. G. as a “relative” and offered her critiques of the Staff Report, including her view that clamping down on criticism of Zionism could erase identities of Palestinians and silence anti-Zionist Jewish voices.

ANALYSIS

Sadly, this is far from the first time I have been faced with complaints concerning the Israel-Gaza conflict, antisemitism, and similar unhappy topics over the past 12-18 months – not only at the TDSB, but also across various entities where I carry out Integrity Commissioner and investigation work, and generally as a conflict resolution practitioner.

I reiterate an approach I have expressed several times before, even if not to these parties specifically. These complaints effectively ask me to weigh in on opposing views of a geopolitical conflict that has deeply divided millions of people around the world. They invite me to review opposing interpretations of whether certain comments fit particular definitions or viewpoints (e.g., how to define “blood libel”). The implied proposition is that I ought to formally weigh in on the geopolitical landscape at a high level or adjudicate individual opinions of such. That is simply incompatible with the limited framework of the Code of Conduct and my legislated mandate.

The question I must determine is whether Trustee Lulka Rotman’s actual words were contrary to the Code of Conduct’s rules. I wish to be clear: I do not find that she personally insulted, abused, or bullied anyone, nor did she falsely or maliciously impugn anyone’s reputation. A difference of opinion is not a lie, nor is voicing it inherently intended to cause harm (i.e., malicious). I interpret Trustee Lulka Rotman’s views as personal feelings she felt as a Jewish person. Her expressed views were representative of some – arguably widely held – community views that were either shared at the meeting or by individuals and organizations since. This included information that certainly reads as personal

outrage from a member of Mr. G.'s family concerning direct references to him by Complainant #3. I accept that some people disagree with Trustee Lulka Rotman's views. Indeed, I acknowledge there are a range of views and a range of tolerances of these views. This is a divisive topic during a tumultuous time.

Trustee Lulka Rotman seems outspoken on this issue herself. She offered an impassioned defence of her viewpoints, which included strong criticism of the comments she heard from delegations which she viewed as an attack on her beliefs. I will not comment on those beliefs. However, as I read and listened to Trustee Lulka Rotman's words, I did not find that she attacked anyone; rather, it seemed that she attacked the ideas they expressed because she fundamentally and viscerally disagreed with them. Of this I am certain – the Code of Conduct is not intended to be applied in a manner that would render Trustees mute when they believe a passionate expression of ideas is required in a moment of critical debate concerning Board business (subject to reasonable limitations). I do not agree that Trustee Lulka Rotman's language was false or had malicious intent. It was an expression of her (arguably widely held) beliefs. Anyone is free to agree or disagree with her opinions. If the positions of the parties and their references to various community opinions demonstrate anything, it is that this is an ongoing and unresolved debate.

One of the key statements uttered by Trustee Lulka Rotman that caused alarm to the Complainants was the following:

The amount of antisemitism that was on blatant display last night was gut-wrenching. Not only did we hear an overwhelming number of factual and historical inaccuracies, but full-on antisemitic tropes, including blood libel, global Jewish power, and holocaust inversion.

In stating this, Trustee Lulka Rotman did not specifically name any individual or attack them personally, but rather she gave an overview of how she perceived many of the comments delivered during the meeting. They are views within the bounds of what she is entitled to express. There is a significant difference between opining that a comment or action is antisemitic or hateful versus directly calling a person antisemitic or hateful. The former attacks an idea while the latter is an *ad hominem*.

I found Trustee Lulka Rotman's comment about the motivations of anti-Zionist delegations (i.e., that they came out of "hate and animosity") to be more challenging, as these words were perhaps less than well articulated, but I ultimately find her words to be strongly linked to opposing *ideas* which she personally found hateful and antagonistic at a fundamental level. In other words, her comments addressed what she perceived as the genesis of ideas that she finds to be hateful and upsetting. This context provides some

degree of mitigation respecting comments that are closer to the line. That said, I think it is important to tread carefully when presuming to know the motivations of others and I would caution Trustee Lulka Rotman, and all Trustees, against verbalizing adverse assumptions.

I noted above that several organizations contacted the Board and Trustee Lulka Rotman voicing similar condemnations of some delegations at the February 12th committee meeting. These comments provide a flavour of the swift and significant reaction from some Jewish organizations in the community. There are also some organizations that feel the opposite and hold beliefs that align with what the Complainants have expressed, such as those cited by Complainant #1 and also quoted above.

Complainant #3 referenced the Ontario Human Rights Code and stated that it interprets anti-Zionism as antisemitic “only if Israel is seen as representative of all Jews, rather than legitimate criticism of Israel as a state.” That specific reference, which is from the Ontario Human Rights Commission’s website, presents a 2004 interpretation (along with other references) in the footnotes of a discussion paper concerning creed-based discrimination. The referenced statement was cited as context and does appear to represent one definitive position.

On the subject matter, Trustee Lulka Rotman’s comments appear to indicate that she strongly connects Israel with her Jewish identity through historical, religious, and cultural practices. She therefore views anti-Zionism – perceived as opposition to Israel’s existence – as an affront to her cultural identity – all of which is clear from her statement. There are a range of views on this topic. Sorting out the correct one(s), or defining the lines of tolerance, is not the intent of the Code, which regulates conduct not opinion.

Section 6.9

I reiterate that section 6.9.1 reads:

- 6.9.1. Members of the Board act in the service of the community. They have the opportunity to set an example for future leaders who may look to them for guidance and leadership. They are expected to respect the procedural rulings of the Chair. They are expected to refrain from verbally attacking or belittling those who complain or do not agree with them. It is vital that Members of the Board conduct themselves with decorum at Board and committee meetings and in accordance with the provisions of Board Bylaws concerning meeting procedures.

Trustee Lulka Rotman expressed her own thoughts and emotions, which reflected the positions articulated in some of the delegation comments and opposed the positions reflected in other delegation comments, including those of the Complainants. Such is the nature of conflict – there will be agreement and disagreement. Trustee Lulka Rotman was clearly upset and felt her values and identity had been attacked. She responded by attacking those ideas which she perceived as an assault against her core beliefs. This differs from “verbally attacking and belittling those who complain or do not agree with [her].” Further, I note that the family of Mr. G. informed her that Complainant #3’s comments were false and defamed him, and they specifically asked Trustee Lulka Rotman to intervene, which she did. Trustee Lulka Rotman did not call anyone names or attack their person or character, but rather “attacked” their views and expressions – which is an important distinction where the Code of Conduct is concerned.

Section 6.10

Section 6.10.1 reads:

- 6.10.1. No Member of the Board will maliciously or falsely injure the professional or ethical reputation, or the prospects or practice of Staff Members of the TDSB, and all Members of the Board will show respect for the professional capacities of Staff Members.

I find that Trustee Lulka Rotman did not maliciously or falsely injure the professional or ethical reputation, or the prospects or practice, of Staff Members, nor did she fail to respect the professional capacities of Staff Members. She offered an impassioned rhetorical defence of her identity and beliefs, reflecting the views of many community members who also felt harmed by some delegates’ statements. As an elected representative, she is permitted to express these views, even if they stand in stark opposition to the views of delegates. Furthermore, it is my view that Complainant #3’s status as a Board Staff Member is incidental. Complainant #3 attended and spoke as a delegate and offered her views on the subject matter as a delegate. I do not interpret a Trustee’s response to the information and opinions shared by a delegate as an attack against “Staff”. Employment status does not shield a delegation from opposition.

Re: Section 6.11

The applicable provisions of 6.11 state:

- 6.11.1. All Members of the Board have a duty to treat members of the public, one another, and Staff Members respectfully and without abuse, bullying or

intimidation, and to ensure that their work environment is free from discrimination and harassment. This provision applies to all forms of written and oral communications, including via social media.

- 6.11.2. When acting or holding themselves out as a Member of the Board, the member will conduct themselves in a manner that would not discredit or compromise the integrity of the TDSB.
- 6.11.3. When acting or holding themselves out as a Member of the Board, the member will treat persons equally without discrimination based on a person's race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, marital status, family status, disability or socioeconomic status.

I do not find Trustee Lulka Rotman's impugned statement to be a case of abuse, bullying, intimidation, harassment, or discrimination. She voiced a strongly worded opinion with which some community members agreed while others disagreed. I have learned in the past two years that giving voice to some community members about this issue seems to necessarily mean opposing the voice of others. It is not resolvable through this forum. Had Trustee Lulka Rotman said nothing, then many community members relying on her to provide them a voice at the Board would likely have been equally disappointed – which was clearly expressed in some of the correspondence addressing the overall proceedings. I reiterate that voicing a dissenting view, even strongly, is not in itself tantamount to a Code violation.

General Principles Concerning Political Expression

I feel compelled to comment briefly on the general principle of free expression, which has appeared to be under attack in recent years from all directions. Codes of conduct, as far as they apply to school boards, exist to prohibit unwanted conduct for the purpose of preserving order and dignity within public education governance bodies to maintain public confidence. The primary purpose of Code enforcement is achieving compliance with policy and statutory objectives. Codes justifiably create limits on conduct, but those limits must be reasonable in their scope, and their application must also be reasonable and in line with their core purposes.

As noted in *Robinson v. Pickering (City)* at para 124⁷:

⁷ *Robinson v. Pickering (City)*, 2025 ONSC 3233 (CanLII) - <https://canlii.ca/t/kccb1>

The Supreme Court of Canada has repeatedly held that administrative decisions may limit an individual's rights under the Canadian Charter of Rights and Freedoms where the limit is proportional to the statutory objective that the administrative agency is required to fulfill.

The limitations, however, can only go so far.

Per *Re VanLeeuwen*⁸, while a code may establish proportional limits, it “should be interpreted in a manner consistent with the *Canadian Charter of Rights and Freedoms*.” That was also noted by the Court in *Robinson*⁹:

If, in exercising its statutory discretion, the decision-maker has properly balanced the relevant Charter value with the statutory objectives, the decision will be found to be reasonable.

While those were municipal governance cases, the same principles apply in the school board setting – noting that school boards are public bodies formed by the government, though subject to the *Education Act* rather than the *Municipal Act, 2001*. A school board code of conduct – which is mandated by the *Education Act* – limits behaviour viewed as detrimental to the education system and/or a board's institutional good standing. A statutorily empowered Integrity Commissioner must interpret and enforce codes reasonably and in line with *Charter* principles, and with a view to the core mandate of school boards set out in the *Education Act*.

School board Trustees do not, in my view, have *carte blanche* to use their position to frivolously spout divisive political opinions which are unconnected to the actual work of the board or which are harmful to the board and its stakeholders (e.g., discriminatory speech as defined by the Ontario Human Rights Code), but they are surely permitted to respond to delegations concerning items of board business and to express dissenting views on information that has been shared with them through that process.

In the present case, I acknowledge that Trustee Lulka Rotman's political statements were strongly worded. I further acknowledge that they could be viewed as lacking in diplomacy and that they left the Complainants feeling offended. However, I also find that her remarks do not meet the threshold for Code enforcement that would supersede her right to freedom of expression.

⁸ Re VanLeeuwen, 2021 ONMIC 13 (CanLII) - <https://canlii.ca/t/jjj68>

⁹ *Supra* at Note 8

CONCLUSION

For the reasons set out above, I do not find that Trustee Lulka Rotman breached the Code. The Complaints are dismissed.

The Board of Trustees is no longer required to consider Integrity Commissioner reports and make decisions related to the findings. The Board was historically the statutory decision-maker, weighing the Integrity Commissioner's findings and recommendations, and then deciding upon the question of breach and (if necessary) appropriate sanctions. That process changed on January 1, 2025. The Integrity Commissioner is now fully and solely responsible for determining whether there was a Code breach and how best to address it within the *Education Act's* framework. By conducting my inquiry and issuing this report I have performed my statutory duty as required by the terms of my appointment by the TDSB under the *Education Act*.

My Office has provided a copy of this report to the Complainants and Respondent.

I acknowledge that the Board is currently under Ministry supervision, which contributed to some delay in releasing this report. Noting that TDSB Trustees are not currently performing their normal tasks, I ask the Senior Manager of Governance and Board Services to distribute this report to the appropriate Board official(s) in accordance with current protocols.

Information to be Published

Some information about this matter is mandated to be published on the Board's website, in accordance with section 218.3.2 (11) of the *Education Act*, which states:

A board shall keep records and publish information on its website about each of the following:

1. A matter referred to an integrity commissioner under subsection 218.3(3).
2. A decision of the integrity commissioner under subsection 218.3(8).
3. A determination of an integrity commissioner under section 218.3.1.
4. A determination by a panel under subsection (7) or (8).

Note that it is not a requirement that this report be published in full – rather, “information” about it must be published. This does not preclude the Board from publishing it in full if the Board chooses, and I understand this has been done with previous reports since the above-noted procedural changes came into effect. I am leaving

it to the Board to determine what should be published to fulfill the above-noted requirements.

Notice - Right of Appeal

Section 218.3.2 (1) of the *Education Act* establishes rights of appeal. It states:

Appeal

Either the board or the member whose conduct was the subject of the integrity commissioner's determination under section 218.3.1 may appeal the determination, the sanctions imposed, or both, and the board and the member are the parties to such an appeal.

Board resolution to appeal

The member whose conduct was the subject of the integrity commissioner's determination shall not vote on a board resolution to determine whether the board will appeal that determination under subsection (1).

Notice of appeal

(3) The board or the member who appeals the integrity commissioner's determination shall give written notice of the appeal to the other party and the Deputy Minister no later than 14 days after receiving written notice of the integrity commissioner's determination, or within such other time period as may be prescribed by regulation.

However, that prescribed timeline was subsequently altered by O. Reg. 306/24:

Notice of appeal

For the purposes of subsection 218.3.2 (3) ... the appellant shall give the written notice of appeal ... no later than 15 business days after receiving written notice of the integrity commissioner's determination.

To be clear – the only Parties who may appeal this decision are Trustee Lulka Rotman or the Board. Given that the Board is under supervision, I speculate that the Supervisor may retain authority to exercise the Board's right. The Complainants have no right of appeal.

I now consider this matter to be concluded.

Yours very truly,

A handwritten signature in black ink, appearing to read "M. Maynard", with a long horizontal flourish extending to the right.

Michael L. Maynard
Integrity Commissioner