

City of Owen Sound
Integrity Commissioner's
Recommendation Report
Regarding Councillor Marion Koepke

March 23, 2026 Revised

Executive Summary

- [1] This report results from a complaint against Councillor Koepke for her conduct as a Councillor for the City of Owen Sound ("Owen Sound") alleging a pattern of behaviour on her part towards Councillor Farmer that constitutes bullying.
- [2] The allegations are that Councillor Koepke engaged in a pattern of inappropriate behaviour towards Councillor Farmer that included negative, patronizing and disparaging comments, eye rolling, public scolding, demeaning side talk with neighbouring Councillors and a single instance where it was alleged that she physically hit Councillor Farmer, all of which demonstrated a lack of decorum and constituted bullying towards Councillor Farmer.
- [3] We find that the Councillor's conduct, does not constitute a pattern of bullying, although it does include instances of found and admitted minor incivility. We do not find the single instance where Councillor Koepke had brief, non-violent physical contact with Councillor Farmer to be a breach of the Code of Conduct. We do find a single instance of minor incivility on the part of Councillor Koepke towards Councillor Farmer arising during the Renaming of Ryerson Park Meeting [Incident 8]), which in our view demonstrates a lack of decorum in breach of the Owen Sound Code of Conduct for Members of Council ("Code of Conduct").
- [4] In arriving at our conclusions, we find that contributing factors to this complaint include a general lack of agreement of what constitutes appropriate decorum, including dress and conduct at Council, and a departure from strict adherence to the Procedural By-law that has given rise to a level of frustration resulting in routine minor incivilities.
- [5] While sitting cross-legged and with bare or sandaled feet is not strictly speaking a breach of the Code of Conduct, we find that it is offensive to those seated beside Councillor Farmer, that Councillor Farmer should have been more attuned to this and lacks decorum, which we find to be a mitigating factor to this complaint.
- [6] To ensure that Council has the appropriate training, advice and guidance to ensure that its members share a common understanding of what is acceptable conduct and appropriate decorum at Council and are able to appropriately

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identify and handle instances of minor incivility, we recommend that training on this subject be delivered to Council.

- [7] While we do not believe a monetary penalty serves a purpose in this instance, the single instance of minor incivility not being an egregious breach of the Code of Conduct, we are hopeful that this experience and the recommended training will lead Councillor Koepke and her fellow Councillors to better understand what constitutes appropriate decorum, dress, conduct and how to avoid incivilities at Council.

The Complaint

- [8] On October 6, 2025, we received a complaint from Owen Sound City Councillor Jon Farmer.
- [9] The complaint alleged that Councillor Koepke had engaged in a pattern of inappropriate behaviour towards Councillor Farmer that demonstrated a lack of decorum and constituted bullying in breach of the Code of Conduct.
- [10] The allegations were that Councillor Koepke made negative, patronizing and disparaging comments towards and about Councillor Farmer, engaged in eye rolling, public scolding and demeaning side talk with neighbouring Councillors and that there had been a single instance where she physically hit Councillor Farmer. Councillor Farmer cited eight separate incidents occurring over several years in support of the allegations.
- [11] The actions on the part of Councillor Koepke were alleged to have demonstrated a pattern of behaviour that is inappropriate, demonstrated a lack of decorum and amounted to bullying in the workplace.
- [12] It is alleged that this conduct breached the Code of Conduct.

Process Followed for this Investigation

- [13] In conducting this investigation, Principles Integrity applied the principles of procedural fairness and was guided by the complaint process set out under the Code of Conduct.
- [14] This fair and balanced process includes the following elements:
- Reviewing the complaint to determine whether it is within scope and jurisdiction and in the public interest to pursue, including giving consideration to whether the complaints should be restated or narrowed, where this better reflects the public interest
 - Notifying the respondent of the complaint against her and obtaining her response

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- Conducting interviews of persons with information relevant to the complaint
- Reviewing the relevant documentation
- Providing the respondent with the opportunity to review and provide comments to the Integrity Commissioner's Preliminary Findings Report, prior to finalizing and submitting our Recommendation Report.

[15] In this regard, we have assessed the information fairly, in an independent and neutral manner, and have come to our findings only after providing an opportunity to the respondent to respond to the allegations, and to review and provide comment on the preliminary findings.

[16] Our statutory obligation is to conduct a confidential investigation and so the report contains only the information we consider necessary for the purpose of Councillor Koepke and Council to understand our recommendations in light of our findings.

[17] A confidential investigation also protects the identities of persons who give evidence. In each case we assess the credibility of witnesses and give their evidence appropriate weight as we make our findings.

The Council Code of Conduct and the Applicable Law

[18] The City of Owen Sound Code of Conduct for Members of Council, Local Boards and Committees contain the following provisions relevant to this complaint:

Purpose

1. Members of Owen Sound Council, Boards and Committees recognize their obligation to serve the public in a conscientious and diligent manner understanding that as leaders of the community, they are held to a higher standard of behaviour and conduct.
3. This Code of Conduct ("Code") ensures that Members share a common basis and understanding for acceptable conduct, in concert with and beyond the minimum standards of behaviour set out in the existing legislative framework.

Part 9 - Member Conduct

62. Members shall conduct themselves at meetings with decorum in accordance with the provisions of the City's Procedural By-law.

Commentary: Members recognize the importance of cooperation and strive to create an atmosphere during Council and Committee meetings that is conducive to solving the issues before Council or Committee, listening to various points of view and using respectful language and behaviour in relation to all of those in

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attendance.

65. Members shall conduct themselves with appropriate decorum at all times.

Commentary: As leaders in the community, Members are held to a higher standard of behaviour and conduct, and accordingly their behaviour should be exemplary.

Part 11 – Respect for the City By-laws and Policies

70. Members shall adhere to such by-laws, policies and procedures adopted by Council that are applicable to them.

Commentary: A Member must not encourage disobedience of a City by-law in responding to a member of the public, as this undermines confidence in the City and in the Rule of Law.

Part 12 – Respectful Workplace

71. Members are governed by the City's Workplace Violence, Harassment & Sexual Harassment Policy. All Members have a duty to treat members of the public, one another and staff appropriately and without abuse, bullying or intimidation and to ensure that their work environment is free from discrimination and harassment.

Commentary: It is the policy of the City that all persons be treated fairly in the workplace in an environment free of discrimination or personal and sexual harassment.

The City's Workplace Violence, Harassment & Sexual Harassment Policy ensures a safe and respectful workplace environment and provides for the appropriate management of any occurrences of harassment and discrimination as those terms are defined in the policy.

The City's Workplace Violence, Harassment & Sexual Harassment Policy applies equally to Members and members of staff. It will provide guidance to the Integrity Commissioner when a complaint is received involving a Member.

Background and Context

[19] The City of Owen Sound is generally seen as a professional and collegial work environment with most Council members getting along.

[20] Councillor Koepke is in her third term on Owen Sound Council, sits as Chair of the Community Services Committee, and was previously an employee with Owen Sound ending her career as City Clerk.

[21] Councillor Farmer is in his first term on Owen Sound Council and sits as a member of the Community Services Committee.

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[22] Councillor Farmer's complaint cited eight separate incidents in support of his allegations of inappropriate behaviour and bullying, including:

- (1) Transportation Survey Email (May 2023):
Email interaction between Councillor Koepke and Councillor Farmer regarding distribution of similar types of communication.
- (2) Grey County Hosted Zoom Meeting (August 8, 2024):
Text exchange between Councillor Koepke and Councillor Farmer regarding name display issues during the Zoom meeting.
- (3) Orange Shirt Day (September 23, 2024):
Verbal exchange between Councillor Koepke and Councillor Farmer regarding wearing of a tie to Council.
- (4) Hotel Rezoning Exchange (January 2025):
Councillor Koepke commenting directly to Councillor Farmer during a Council meeting rather than through the Mayor as meeting chair.
- (5) Physical Exchange re Cross-Legged Sitting on Chair (April 28, 2025):
Councillor Farmer while sitting cross-legged on his chair at Council alleges Councillor Koepke struck his left knee with her right hand while telling him to put his legs down. Councillor Farmer refused to put his legs down which Councillor Koepke identified as offensive.
- (6) Councillor Farmer hears Disparaging Remarks (May 26, 2025):
While in the role of Acting Meeting Chair at council Councillor Farmer hears Councillor Koepke making disparaging remarks about him while engaging in side-talk with a neighbouring Councillor.
- (7) Community Services Meeting (September 17, 2025):
Councillor Koepke as Committee Chair brings to an end discussion on an issue raised by Councillor Farmer at Committee.
- (8) Renaming Ryerson Park Meeting (September 22, 2025):
Councillor Koepke's comments during meeting objecting to Councillor Farmer becoming Chair of the Working Group was seen as biased and personal to Councillor Farmer.

[23] Councillor Farmer alleges that Councillor Koepke's behaviour is targeted and personal to him in that it is directed only to him, not to other Councillors.

[24] In early 2025 a Council seating assignment change resulted in Councillor Farmer and Councillor Koepke being seated beside one another leading to an escalation in negative interactions between them.

Analysis and Findings

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[25] In her written response, Councillor Koepke acknowledges engaging in smirking and eye rolling towards Councillor Farmer, identifies her behaviour as rude and wrong but denies being the only member of Council engaging in such behaviour. She specifically denies laughing at Councillor Farmer.

[26] In her written response, Councillor Koepke identified her experience with Councillor Farmer as being one in which he takes all of her responses towards him as negative and he believes that she alone is annoyed by him, regardless of intention or whether similar views are held by other Council members.

[27] Councillor Koepke acknowledged that she has joined with other Council members in negative displays of their collective frustration and complaint to each other that Councillor Farmer tries to monopolize Council meetings.

[28] We reviewed the following incidents cited by Councillor Farmer and find none of these interactions to constitute inappropriate behaviour or a pattern of bullying:

1) Transportation Survey Email (May 2023):

We determined through our interviews that there is no formal communication strategy that requires the Mayor to send out communications to Councillors and that while Councillor Koepke was wrong in her understanding that such a strategy existed, the exchange itself does not constitute inappropriate behaviour or a pattern of bullying.

2) Grey County Hosted Zoom Meeting (August 8, 2024):

We reviewed the text exchange and find that the interaction, while perhaps unnecessary, does not constitute inappropriate behaviour or a pattern of bullying.

3) Orange Shirt Day (September 23, 2024):

We were unable to make a finding with respect to the Orange Shirt Day verbal exchange. No witnesses were offered by either Councillor. Councillor Koepke maintains that the exchange was an attempt on her part to engage in light banter while Councillor Farmer maintains that he did not perceive the exchange to be playful in tone.

4) Hotel Rezoning Exchange (January 2025):

The direct exchange between Councillor Koepke and Councillor Farmer during the January 2025 Council meeting was, in our view, something that occurs from time to time at Council and was appropriately handled by the Mayor exercising his duties as chair of the meeting to bring the exchange to an end. Should such an exchange arise again in future, use of Owen Sound Procedural By-law s.115 "Point of Order" provision would be an appropriate mechanism to use.

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- 6) Councillor Farmer hears Disparaging Remarks (May 26, 2025):
Councillor Koepke confirmed that she engaged in a side conversation with another Councillor during this meeting but identified the topic to be a response to a procedural question being asked of her and not disparaging in nature. It was confirmed through interviews that this exchange occurred and that it did not include disparaging remarks about Councillor Farmer.
- 7) Community Services Meeting (September 17, 2025):
We reviewed the video from this meeting which contained a polite, professional and appropriate exchange between Councillor Koepke as Chair of the Committee and Councillor Farmer that appeared to be the Chair discharging her responsibility to keep the meeting streamlined and focused ensuring that questions that have been answered are not repeated and remain focused on the topic at hand.

[29] With respect to the physical interaction between Councillor Koepke and Councillor Farmer prior to the Council meeting of April 28, 2025 [incident 5]:

- 1) Councillor Koepke admits to there being a physical interaction between herself and Councillor Farmer. She denies hitting Councillor Farmer calling it a "tap" with her fingers and stating that when Councillor Farmer indicated that he did not like what she did she immediately apologized to him.
- 2) Councillor Koepke stated that Councillor Farmer was sitting cross-legged with his feet on his chair with his crotch wide open to her which she found to be unprofessional, physically offensive and a breach of appropriate decorum required at a Council meeting.
- 3) Councillor Farmer acknowledged in his complaint that this interaction was about him sitting cross-legged on his chair and that Councillor Koepke had asked him to put his legs down as the manner in which he was sitting was offensive to her, which he refused.
- 4) Councillor Farmer confirmed that Councillor Koepke immediately apologized to him after the interaction, claimed she had tapped him and repeated to him that the manner in which he was sitting was offensive.
- 5) Councillor Farmer admitted that people could be offended by the way he was sitting and explained that he sits this way as the chair is not ergonomically suitable for his height.
- 6) Witnesses described the physical contact between Councillor Koepke and Councillor Farmer as a "brush off the knee that looked like a nudge", a "tap not a hit", and a "swat" and recalled that Councillor Farmer was sitting on his chair with bare feet on this occasion.

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- 7) Interviews confirmed that there have been a number of previous grievances and groanings regarding the cross-legged manner in which Councillor Farmer sits on his Council chair, that Councillor Farmer is aware that people could be offended by the his manor of sitting, and has ignored or failed to notice obvious physical cues such as neighbouring Councillors pushing their chairs back and away from him because they are uncomfortable with the situation.

[30] Based on the preponderance of evidence, we find that the nature of the physical interaction between Councillor Koepke and Councillor Farmer on April 28, 2025, was in the form of a "tap" rather than a "hit", that it was neither aggressive nor sexual, and although not ideal as a means to get someone's attention, it does not constitute a breach of the Code of Conduct.

[31] With respect to the Renaming Ryerson Park Working Group Meeting on September 22, 2025 [Incident 8]), and allegations that Councillor Koepke's comments about Councillor Farmer were biased, personal in nature and implied incompetence on his part:

- 1) In her written response, Councillor Koepke denied making rude or bullying remarks, explaining her comments as raising concerns for impartiality on the part of the Working Group Chair.
- 2) Witnesses to this meeting described Councillor Koepke as not being particularly 'nice' and perhaps a bit 'derogatory', but that her comments were not seen as insulting Councillor Farmer's intelligence but instead expressing a concern over him being biased and being overly verbose.
- 3) We find that, while the nature of the meeting may have been intended as a fulsome discussion of the merits of individual capabilities to take on the role of meeting chair, the words used were more demeaning and personal in nature than warranted which we find to be a minor incivility that, while not egregious in nature, constitutes a breach of the Code of Conduct.

[32] It has become apparent, in the course of our investigation, that the relationship between Councillor Farmer and Councillor Koepke is at best a strained relationship that contains very little trust, tolerance or forgiveness of each other and that the 2025 seating arrangement created more friction in that relationship.

[33] It would be our recommendation that these two Councillors do not sit beside each other moving forward. We also see little purpose served by the annual change in seating currently provided for in Policy GOV001 - Board, Committee and Seat Selection. We understand it was introduced at a time when televising/recording Council meetings was done by a stationary camera, and currently there are speaker-activated cameras. While its genesis was supportable, perpetuating the annual shuffle seems unnecessary and unhelpful.

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- [34] Our Interviews revealed that there is a collective frustration amongst Council members arising from the actions of one Councillor to try and monopolize Council and committee meetings, being permitted to speak out of turn, asking repetitive questions, and reiterating the same point each time recognized with limited reliance on the Procedural By-law to curb such behaviour.
- [35] In our view it would be entirely appropriate for the Mayor to curb such behaviour by taking a stricter approach to application of the Procedural By-law. This would alleviate some of the frustration we have been told arises at Council regarding Councillor Farmer's conduct.
- [36] Concerns were also raised to us with respect to the issue of appropriate dress at Council, whether an overly casual approach to dress at Council offended the high standard of decorum expected under the Code of Conduct and whether an appropriate policy existed that governed this issue with several requests for clarity on the issue being identified. The basis for these concerns includes instances where a Councillor was described as wearing open toe sandals, jeans, shorts, bare legs and feet to Council and on occasion being seen to take off shoes.
- [37] We understand that the expectation has been that a more casual approach to dress is taken at Committee meetings with a more formal approach of business dress including suit and tie or similar attire being adopted for Council with minor relaxing of standards during summer sessions.
- [38] We have reviewed the Owen Sound - Dress Code Policy (Policy HR018) which applies to Council members (as they are for the purpose of this policy defined as "Employees") which provides the following guidance:
- "Business Casual" refers to a style of dress that is less formal than traditional business attire but still promotes a professional image. This may include collared shirts, blouses, dress slacks, and professional footwear.*
- "Casual Attire" means comfortable clothing that is more relaxed in style, often including jeans, t-shirts, and sneakers, but still appropriate for the workplace.*
- "Inappropriate Attire" refers to clothing items that are deemed unsuitable for the workplace, such as overtly casual clothing (such as sweatpants, tank tops, flip-flops), any attire that displays offensive language or imagery, branded logos or graphics unrelated to the workplace, clothing items that are revealing, unclean or frayed, or clothing that is deemed unsafe for the employee's job duties and requirements.*
- [39] Should Council wish to adopt a more prescriptive Dress Code Policy it would be within its purview to raise this issue for consideration and debate.
- [40] Council Members identified through the investigation process that they perceived certain behaviours as offensive, acts of minor incivility and lack of decorum. Those comments included the way Councillor Farmer sits in his Council chair, refusing to put his feet down despite being asked to do so and

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some Councillors reacting to Councillor Farmer at Council by engaging in eye rolling, smirking, and negative side-talk.

[41] We would suggest that any such behaviour, and appropriate levels of tolerance for behaviour that is seen to be atypical, could be improved through training, advice and guidance delivered to Council to ensure that members of Council share a common understanding of what is acceptable conduct and appropriate decorum at Council and are able to appropriately identify and handle instances of minor incivility.

[42] In summary, we find one instance of minor incivility on the part of Councillor Koepke towards Councillor Farmer as identified in the complaint arising during the Renaming of Ryerson Park Meeting [Incident 8)], which in our view demonstrates a lack of decorum in breach of the Code of Conduct. We do not find a pattern of behaviour that constitutes bullying.

[43] Councillor Koepke in response to our providing her with our Preliminary Findings Report confirmed that she has undertaken mandatory Thematic Training required for her role on the Police Service Board dealing with issues relating to Equity, Diversity, Inclusion and Sensitivity which has assisted her in forming a better understanding of how to deal with the issues that gave rise to this complaint and has since that training been polite and respectful toward Councillor Farmer.

Disciplinary Role of Council

[44] The role of Council is not to reinvestigate the findings in this report. The role of the Integrity Commissioner is to undertake a thorough, confidential, and impartial investigation, which has now been completed. The tenets of procedural fairness require us to provide reasons for our conclusions and recommendations, and we have done that. Procedural fairness also requires us to conduct a process where parties can participate in the review and resolution of a complaint.

[45] Rather, the role of Council is to review the report and decide which sanctions, if any, are necessary. The Integrity Commissioner can recommend training and/or sanctions as they deem appropriate based on the circumstances of the complaint, but it is Council who is the final voice in determining what should be done.

Recommendations

[46] An Integrity Commissioner's investigation report is not simply the conclusion of a technical exercise to determine whether there has been a breach of codified standards of behaviour. Our role is more than simply the task of bringing adjudication to grievances between individuals. As noted at the outset, we see as our highest objective in concluding an investigation to be the making of recommendations that serve the public interest.

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[47] One of the most important functions of an integrity commissioner is to provide training, advice and guidance to members to help sort out ethical grey areas or to confirm activities that support compliance. The Integrity Commissioner's role is as much about education as it is about adjudication, so that municipal government can function better, and that members of the public are able to confidently conclude that members of their municipal council are acting with integrity.

[48] To ensure that Councillor Koepke and Council have appropriate and sufficient training, advice and guidance to ensure that members of Council share a common understanding of what is acceptable conduct and appropriate decorum at Council and are able to appropriately identify and handle instances of minor incivility and decorum, we also recommend that training on this subject be delivered to Councillor Koepke and Council by either a third-party provider, or by requesting *Principles Integrity* to conduct an education and training session. Though this report centres upon Councillor Koepke's behaviour in the instances described, it is appropriate that all of Council participate in the training so that there is a shared understanding of the standards that apply.

[49] While we do not believe a monetary penalty serves a purpose in this instance, the single instance of minor incivility not being an egregious breach of the Code of Conduct, we are hopeful that this experience and the recommended training will lead the Councillor to better understand what conduct constitutes minor incivility and that she will recognize moving forward that such conduct should not be repeated.

[50] Accordingly, it is our recommendation:

1. That an education and training session be arranged on appropriate conduct and decorum at Council, and best practices for handling difficult situations at Council; and
2. That all of Council be requested to attend the education and training session.

[51] We wish to conclude by publicly thanking all those who participated in our investigation, particularly the complainant, respondent, and witnesses.

[52] We will be available virtually to introduce this report and respond to questions during the Council meeting at which this report is considered.

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About Principles *Integrity* and the Complaint Process

Principles *Integrity* was appointed the Integrity Commissioner for the City of Owen Sound on March 5, 2018. We are also privileged to serve as Integrity Commissioner for a number of other Ontario municipalities. The operating philosophy which guides us in our work with all of our client municipalities is this:

The perception that a community's elected representatives are operating with integrity is the glue which sustains local democracy. We live in a time when citizens are skeptical of their elected representatives at all levels. The overarching objective in appointing an integrity commissioner is to ensure the existence of robust and effective policies, procedures, and mechanisms that enhance the citizen's perception that their Council (and local boards) meet established ethical standards and where they do not, there exists a review mechanism that serves the public interest.

The Township has as part of its ethical framework a Code of Conduct which is the policy touchstone underlying the assessments conducted in this report. It represents the standard of conduct against which all members of Council are to be measured when there is an allegation of breach of the ethical responsibilities established under the Code of Conduct. The review mechanism contemplated by the Code, one which is required in all Ontario municipalities, is an inquiry/complaints process administered by an integrity commissioner.

Integrity commissioners carry out a range of functions for municipalities (and their local boards). They assist in the development of the ethical framework, for example by suggesting content or commentary for codes of conduct. They conduct education and training for members of council and outreach for members of the community. One of the most important functions is the provision of advice and guidance to members to help sort out ethical grey areas or to confirm activities that support compliance. And finally, but not principally, they investigate allegations that a person has fallen short of compliance with the municipality's ethical framework and where appropriate they submit public reports on their findings, and make recommendations, including recommending sanctions, that council for the municipality may consider imposing in giving consideration to that report.

It is important that this broad range of functions be mentioned in this investigation report.

Our goal, as stated in our operating philosophy, is to help members of the Uxbridge community, indeed the broader municipal sector and the public, to appreciate that elected and appointed representatives generally carry out their functions with integrity. In cases where they do not, there is a proper process in place to fairly assess the facts and, if necessary, recommend appropriate sanctions. In every case, including this one, the highest objective is to make recommendations that serve the public interest, if there are recommendations to be made.

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Our role differs from other 'adjudicators' whose responsibilities generally focus, to state it colloquially, on making findings of fact and fault. While that is a necessary component when allegations are made, it is not the only component.

Our operating philosophy dictates the format of this report. The tenets of procedural fairness require us to provide reasons for our conclusions and recommendations, and we have done that. Procedural fairness also requires us to conduct a process where parties can participate in the review and resolution of a complaint.