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Commissioner Nancy Belanger  
Office of the Commissioner of Lobbying of Canada  
255 Albert St., 10<sup>th</sup> Floor  
Ottawa, ON K1P 6A9

August 16, 2019

**Re: Possible Code of Conduct Breach by SNC-Lavalin**

Dear Commissioner Belanger,

I am writing to follow up on a letter I sent to you on February 13, 2019, regarding a potential breach of section 6 of the *Code of Conduct for Lobbyists* on the part of senior corporate officers working for SNC-Lavalin. Section 6, as you know, obliges lobbyists not to place public office holders in a conflict of interest.

I have not heard back from you since that time regarding this matter, excepting an acknowledgement of receipt.

The Conflict of Interest and Ethics Commissioner has now ruled in the *Trudeau II Report* that the Prime Minister, Mr. Justin Trudeau, violated section 9 of the *Conflict of Interest Act*.

I believe that you should consider the matter of SNC-Lavalin's role in this matter now, if you have not done so already. Canadians need to know that our lobbying system is not being systematically abused by the biggest and best-connected companies in Canada.

Mr. Dion found in his report that the Prime Minister's attempts to use his position to improperly advance SNC-Lavalin's attempts to secure a deferred prosecution agreement, and consequently further the company's private interests, broke the law.

Mr. Dion's findings of fact show a disturbing pattern of co-operation and mutual support between the the Prime Minister's office and senior SNC-Lavalin officials. They worked together to find a way to put inappropriate political pressure on the former Attorney General, Jody-Wilson Raybould – which would

run afoul of the company's obligation under the *Code of Conduct* not to act in such a way as to place public office-holders in a conflict of interest.

According to paragraph 166 of the *Trudeau II Report*, a senior SNC-Lavalin official wrote to former President of the Treasury Board, Mr. Scott Brison, that his company was "considering other ways to make it easier for the Minister to engage and reverse the [Director of Public Prosecutions'] decision. In the end however, it will take a deliberate decision from the center [sic]." Mr. Brison then forwarded this message to the Prime Minister's Office.

SNC-Lavalin clearly perceived that a political decision had to be made in the Prime Minister's Office to improperly overrule the Director of Public Prosecutions and behaved accordingly in its pattern of contacts with the government. Mr. Dion found that the Prime Minister's attempt to interfere on their behalf was intrinsically a decision made to improperly advance a private interest in paragraph 319 in his report.

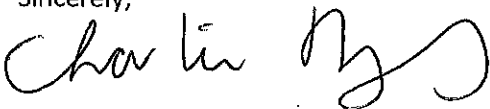
In paragraphs 190-193, Mr. Dion finds that SNC-Lavalin kept the Prime Minister's Office informed of its own attempts to convince Ms. Wilson-Raybould to overrule the Director Public Prosecutions, and in paragraph 198, notes that "someone in the Prime Minister's Office" intended to raise the legal stratagem devised by SNC-Lavalin with the former Attorney General. According to paragraph 203, an SNC-Lavalin representative asked PMO staff for updates pursuant to a dinner meeting between Mr. Gerald Butts, the former principal secretary to the Prime Minister, and Ms. Wilson-Raybould.

In paragraph 208, Mr. Butts noted to Jessica Prince, Ms. Wilson-Raybould's former Chief of Staff, that "the government had set up the remediation agreement regime to allow SNC-Lavalin to benefit from this tool," demonstrating the troubling depth of co-operation between the centre of government and a private corporation and the degree to which the company felt that its interests were tied to being granted a deferred prosecution agreement. This is further supported by paragraph 36, which describes a meeting between SNC-Lavalin CEO Neil Bruce and Finance Minister Bill Morneau in Davos, Switzerland, about its creation.

Overall, Mr. Dion's report found a pattern of active involvement on the part of SNC-Lavalin in Mr. Trudeau's actions that constituted a conflict of interest.

This raises serious questions about the integrity of the lobbying regime, and deserves a thorough examination by your office as soon as possible. Most Canadians do not have a direct line to the Prime Minister. They are rightly disgusted by the prospect of Canada's biggest corporations using their connections to the Prime Minister's Office to advantage themselves in grossly inappropriate ways.

Sincerely,

A handwritten signature in black ink, appearing to read "Charlie Angus". The signature is fluid and cursive, with a large loop at the end.

Charlie Angus, MP  
Timmins—James Bay