



**MANITOBA LEGISLATIVE ASSEMBLY
OFFICE OF THE ETHICS COMMISSIONER**

**REPORT OF
JEFFREY SCHNOOR, K.C.
ETHICS COMMISSIONER**

**Re: The Honourable Mintu Sandhu, Minister of Public Service Delivery and
Member of the Legislative Assembly for The Maples**

December 4, 2025

I. Background

1. On October 27, 2025, Josh Guenter, the member of the Legislative Assembly for Borderland, submitted a request that I conduct an inquiry into alleged breaches of *The Conflict of Interest (Members and Ministers) Act* (“the Act”) by the Honourable Mintu Sandhu, the member for The Maples and the Minister of Public Service Delivery.

2. MLA Guenter alleges that, on January 30, 2025, Minister Sandhu’s Department awarded a contract to Duffy’s Taxi. He notes that, according to Minister Sandhu’s Disclosure Statement of Assets, Liabilities and Sources of Income, his spouse has an interest in Duffy’s Taxi. MLA Guenter therefore alleges that Minister Sandhu was in a conflict of interest. Specifically, he alleges that Minister Sandhu breached sections 2, 3 and 10(2) of the Act.

3. Section 46 of the Act provides:

Notice of inquiry

46 Before conducting an inquiry, the commissioner must give the member whose conduct is the subject of the inquiry reasonable notice.

4. I wrote to Minister Sandhu on October 27, 2025 and provided him with the required notice. I asked him to provide me with detailed information about the contract with Duffy’s Taxi and advised him that, if he wished, he could provide me with a written response to MLA Guenter’s allegations. Minister Sandhu provided me with his response on November 7, 2025. I confirmed the information provided by Minister Sandhu by meeting with him, reviewing relevant documents and speaking with the Deputy Minister of Public Service Delivery.

II. Facts

5. Based on my investigation, I make the following findings of fact:

- Minister Sandhu's spouse has shares in Duffy's Taxi and has provided financing for two of the taxis in its fleet. Minister Sandhu does not have shares in Duffy's Taxi or an interest in any of the taxis in its fleet. This information is publicly available in Minister Sandhu's Disclosure Statement of Assets, Liabilities and Sources of Income.
- In May 2024, the Government of Manitoba issued a Request for Standing Offer to obtain proposals from eligible vendors for standard taxi services and/or accessible carrier services. The closing date for proposals was July 8, 2024.
- The proposals were evaluated by a group of public servants and, on September 13, 2024, the Procurement and Supply Chain Division of the Department of Public Service Delivery recommended awarding the Standing Offer Agreement to Unicity Taxi as the primary vendor, to Duffy's Taxi (1996) Ltd. as the secondary vendor, and to other vendors for additional services. The recommendation noted that the Deputy Minister of the Department had authority to sign the agreement on behalf of the Government of Manitoba.
- The recommendation was accepted by the then Deputy Minister of the Department and Duffy's Taxi was advised on October 3, 2024.
- The Standing Offer Agreement was signed by Duffy's Taxi (1996) Ltd. on October 8, 2024.
- Minister Sandhu joined Cabinet as Minister of Public Service Delivery on November 13, 2024.

- On December 16, 2024, the Standing Offer Agreement was provided to the then Deputy Minister of Public Service Delivery for signature on behalf of the Government of Manitoba.
- The Acting Deputy Minister of Public Service Delivery signed the Standing Offer Agreement on January 2, 2025.
- At no time did Minister Sandhu participate in the decision to award the Standing Offer Agreement to Duffy's Taxi. The decision was made by public servants and approved by the then Deputy Minister and was never considered by Minister Sandhu or Cabinet.
- The Government of Manitoba provides information on its website about contracts that it has entered into: [Province of Manitoba | Disclosure of Contracts](#). The website indicates that information about the contract with Duffy's Taxi was posted there on January 30, 2025. The website shows the start date of the contract as October 3, 2024.

III. Analysis

6. Sections 2 and 3 of the Act provide as follows:

Conflict of interest

2 For the purpose of this Act, a member is in a conflict of interest when the member exercises an official power, duty or function that provides an opportunity to further their private interests or those of their family or to improperly further another person's private interests.

Decision-making

3 A member must not make a decision or participate in making a decision related to the exercise of an official power, duty or function if the member knows or reasonably should know that, in making the decision, the member would be in a conflict of interest.

7. As discussed above, Minister Sandhu did not participate in any decisions relating to the Standing Offer Agreement and did not exercise any official power, duty or function relating to it.

In fact, the decision to award the contract to Duffy's Taxi was made before Minister Sandhu was appointed to Cabinet. Therefore, he did not breach sections 2 or 3 of the Act.

8. Section 10(2) of the Act provides as follows:

Interest in partnerships and private corporations

10(2) A member must not have an interest in a partnership or private corporation that is a party (directly or through a subcontract) to a contract with the government or a government agency under which the partnership or corporation receives a benefit.

9. Minister Sandhu does not have an interest in Duffy's Taxi. His spouse does but that is not prohibited by the Act. Therefore, Minister Sandhu did not breach section 10(2) of the Act.

IV. "Reasonable Grounds to Believe"

10. As I have noted in a previous report, the Act requires that a member must have "reasonable grounds to believe" that the Act has been contravened in order to ask the Ethics Commissioner to investigate the matter. If that threshold is not met, the Commissioner must report that opinion to the Speaker; in that case, the member may be found in contempt of the Legislative Assembly:

Member may request commissioner's opinion

44(1) A member who has reasonable grounds to believe that another member has contravened this Act may request the commissioner to give an opinion respecting the compliance of the other member with this Act. [emphasis added]

. . . .

If no reasonable grounds for making request

48(1) If the commissioner is of the opinion that the member making a request did not have reasonable grounds for doing so, the commissioner must report that opinion to the Speaker.

Distribution of report

48(2) The Speaker must table a copy of the report in the Assembly on any of the first five days on which the Assembly is sitting after the Speaker receives it. If the Assembly is not sitting when the Speaker receives a report, the Speaker must promptly distribute a copy of it to all other members.

Action when no reasonable grounds for request

48(3) The Assembly may, on a resolution of the Assembly carried by a vote of 2/3 of the members voting in the Assembly, hold a member who makes a request without reasonable grounds in contempt of the Assembly.

11. These provisions reflect the seriousness of making a complaint under the Act. Complaints that are not well founded detract from the public's confidence in its elected officials, the very opposite of the purpose of the Act.

12. In a previous report¹, I explained the meaning of "reasonable grounds":

. . . A member does not have "reasonable grounds" if the request for an inquiry is frivolous or vexatious or not made in good faith. A member does not have "reasonable grounds" if they do not present some specific factual basis for the request for an inquiry. There must be something more than suspicion, speculation, hunch or conjecture. For example, the Ontario Integrity Commissioner, the Hon. J. David Wake, in *Re The Honourable Doug Ford and The Honourable Steve Clark* - January 18, 2023, spoke of the need for "direct and credible evidence"; he also recognized that circumstantial evidence could be acceptable "provided it was 'compelling' and credible" (para. 22).

The alleged facts must also link a member's action (or failure to act) with a specific duty or obligation under the Act. As the Supreme Court of Canada has stated, "the reasonable and probable grounds standard requires 'a reasonable belief that an individual is connected to the offence'": *R. v. Beaver*, 2022 SCC 54 at para. 72.

13. I caution all members of the Legislative Assembly that they may be asked to demonstrate that they took reasonable steps to determine whether reasonable grounds exist for a request for an inquiry. For example, members are expected to carefully review publicly available information and take appropriate steps to ensure that they are not seeking the Commissioner's opinion based only on suspicion or speculation. A failure to take reasonable steps may result in a finding that the member did not have reasonable grounds to request an inquiry.

¹ Report Re: The Honourable Wab Kinew, Premier and Minister of Intergovernmental Affairs and International Relations and Minister responsible for Indigenous Reconciliation and Member of the Legislative Assembly for Fort Rouge, February 19, 2025

V. Conclusion

14. Minister Sandhu played no role in the decision to contract with Duffy's Taxi. I therefore conclude that Minister Sandhu has not breached *The Conflict of Interest (Members and Ministers) Act* as alleged by MLA Guenter.

Jeffrey Schnoor, K.C.
Ethics Commissioner