Executive Summary: Ken Sentance—Potential Conflicts of Interest

Part Two of Two

Approximately 1,170 words, excluding charts, references and disclaimer • Estimated reading time: 6 minutes

When does a connection become a conflict of interest, a perceived conflict requiring explanation, or a question of judgment?

This summary examines selected concerns across Ken Sentance's 2018–2022 and 2022–2026 council terms. **Part One** considered his broader record; **Part Two** asks how employment, family connections, board responsibilities and decision-making authority were assessed before decisions advanced. The central issue is the consistency of scrutiny and explanation, not a finding of misconduct.

The records show that Sentance declared interests on several occasions. That deserves acknowledgment. My question is whether he explained why withdrawal was necessary on some matters and participation appropriate on others. Taxpayers should not have to reconstruct those distinctions after public decisions have advanced.

Findings at a glance

Area	Evidence position	Research priority
Bioveld employment	Employer connection and July 2023 declaration verified	Compare other employer-related decisions
McMillan Park	2022 negotiating role verified; spouse employment connection unverified	Establish family connection and advice sought
Housing parking proposal	Dual role and process objections reported; deal still required approval	Trace authorization and negotiations
Consultant commission	Alleged $200,000 transaction not verified	Find contract, resolution and payment record
Voting patterns and Brock	Political oversight questions; no private interest established	Identify exact motions and individual votes

How to read the evidence

Verified means identified in an official record; reported means described in journalism; my account means an uncorroborated recollection; unresolved means essential records are missing. **Part One** supplies context, not independent corroboration. Numbered references and the full verification limits appear at the end.

The rules and the questions they require

The Municipal Conflict of Interest Act addresses direct and indirect financial interests, including relevant employer interests and a spouse's known financial interest. Its application depends on the particular decision and any exception. A municipal board appointment is not automatically a prohibited conflict; section 4(h) may be relevant to the housing corporation. Thorold's Code of Conduct also addresses financial and non-financial conflicts, advice from the Integrity Commissioner and improper direction of staff. [2, 3]

Test	What must be established
Employer connection	Who employed Sentance at the time, and what financial interest that employer had in the particular matter
Family connection	The spouse's relevant financial interest, including a possible indirect employment interest, and Sentance's knowledge

Test	What must be established
Municipal board exception	Section 4(h) may exempt an interest arising solely from a qualifying municipal corporation role or council appointment
Meeting participation	Where the statutory duties apply, disclose the interest and do not discuss, vote or attempt to influence the vote
Influencing staff	Section 5.2 also addresses using office to influence staff decisions or recommendations where a relevant financial interest exists
Broader ethical concern	Thorold's Code requires steps to mitigate non-financial conflicts; the Integrity Commissioner can advise

What the evidence does not establish

Shared votes, organizational connections and unpopular decisions do not alone establish a breach. A declaration records disclosure, not misconduct. Any claim that withdrawal was required must be tested against the specific interest, records and applicable exception. [2, 4]

Declarations located across the two terms

Eight declaration occasions were located: one in first-term minutes and seven in the second-term registry. **This is not a certified complete two-term count.** The registry reviewed ends July 16, 2026; the complete first-term record and later entries remain outstanding. [4, 5]

Date and term	Matter	Reason recorded
Mar 2, 2021 First term	PWCS2021-16 concerning TCAG	TCAG board member; minutes say he did not discuss or vote
May 30, 2023 Second term	CLK-C 55-2023, TCAG volleyball courts resolution	TCAG board member
Jun 20, 2023 Second term	PWCS 69-2023, item 11.15, Volleyball Court Project	TCAG board member
Jul 11, 2023 Second term	CAO 11-2023, item 12.3, Bioveld Canada Inc. lease	Bioveld employee
Aug 1, 2023 Second term	PWCS 75-2023, item 13.6, TCAG daycare at Allanburg Community Centre	TCAG director
Mar 19, 2024 Second term	PWCS 30-2024, item 13.2, Allanburg daycare proposal	TCAG director
May 28, 2024 Second term	Item 12.9, Credit Union digital sign or score-clock donation	Credit Union director
Sep 10, 2024 Second term	PWCS 82-2024, item 12.3, Credit Union digital sign donation	Credit Union director

The seven second-term entries comprise four TCAG, one Bioveld and two Credit Union occasions. Repeated projects at different meetings count separately. No later entries in the reviewed registry does not establish that none were made. [4]

Other organizational roles

Sentance's listed roles include municipal committees, the BIA, Public Library and housing boards, plus TCAG, Credit Union and Kiwanis connections. These identify records to examine, not wrongdoing. [4, 6, 7]

Employer and family connections in the potential sale of McMillan Park to the school board

Reporting confirms that Sentance and Anthony Longo were appointed to negotiate with the school board in 2022; the proposed McMillan Park sale had not proceeded by January 2023. [8]

I recall Sentance telling me by telephone that his wife worked for the school board and reported to the superintendent. I asked about declaring an interest and suggested written advice. My recollection and the employment relationship remain independently uncorroborated. Did the proposal affect her financial interests, and how was the connection assessed? **The public question is how the connection was evaluated and managed.** [2, 3]

Record needed	Question it would resolve
Employment confirmation at the relevant date	Correct employer, position and reporting relationship
Negotiating mandate and relevant minutes	What authority Sentance held and how he participated
Declaration forms and any advice he is willing to disclose	How the connection was assessed and managed

Bioveld and the industrial site

The July 11, 2023 declaration verifies Bioveld employment. It contradicts a claim that Sentance participated in every employer-related matter, while leaving other transactions to be assessed individually. [4, 9]

Additional lead the September 2023 gas plant proposal

The September 2023 agenda lists Bioveld representatives supporting Northland Power's endorsement request. Reporting describes Sentance participating in council's unanimous refusal. The outcome alone does not resolve whether disclosure or withdrawal was required. **Did he seek written advice in advance? Was a declaration recorded?** Employer advocacy alone does not establish a financial conflict; the minutes, commercial interests and applicable exceptions require examination. [2, 10, 11]

Housing corporation and the parking proposal

Reporting identifies Sentance as housing-board co-chair in a proposed arrangement for 33 parking spaces, with City payments of $10,000 annually for five years. Holman said he directed preparation of an agreement; the City solicitor drafted it and the corporation's lawyer reviewed it. Longo and DeRose questioned process and legal costs. A July meeting index indicates earlier council direction, but the original resolution is needed. [12, 13]

Claim or concern	Evidence position	Records to obtain
Sentance negotiated both sides	Dual role established; precise negotiating actions unresolved	Correspondence, mandates and board minutes
Council was kept in the dark	Process objections reported; prior council motion also reported	July resolution and subsequent staff directions

Claim or concern	Evidence position	Records to obtain
Sentance ordered the legal drafting	Not established; Holman said he initiated it	Instructions, authorizations and legal invoices
The agreement was already binding	Not established; approval was still being requested	Executed versions and signing dates
Dual roles required withdrawal	Municipal appointment exception may apply	Appointment instrument and conflict assessment

Preparing an agreement does not prove a completed deal or unlawful bypass. What authority covered the drafting and costs? Which organization was Sentance representing, and who authorized the next step? [3, 12, 13]

If Sentance approached Holman, did his council position create undue or unfair influence, or leave Holman feeling unable to say no? I have not confirmed the approach, pressure or any inability to decline. An individual councillor is not automatically a staff member's personal supervisor. The concern is whether the process protected staff judgment and gave council a meaningful opportunity to examine alternatives.

The alleged consultant commission

I understand a consultant associated with the housing project was to receive approximately $200,000 for securing grant funding, possibly before funds arrived, and that Sentance may have supported payment. The contract, amount, timing, recipient and vote remain unverified. What triggered payment, what recovery risks were assessed, and did any director have a financial connection? An eventual successful outcome does not establish that initial safeguards were adequate.

My concern is the quality of the decision when it was made, not simply whether a loss later occurred.

Voting patterns property interests and Brock

Lead	Established position	What remains unresolved
Recurring voting bloc	Part One describes selected recurring agreement as political commentary	A complete vote dataset and evidence of any private benefit
Downtown property interests	O'Hare's Munro House declarations are recorded. Any claim that Mike De Divitiis should have declared on another matter requires a specific transaction and financial connection. **I recall De Divitiis stating on several occasions during recorded council meetings that he was involved in downtown development. If Sentance knew of those interests and a potential conflict concerning a particular vote, did he owe taxpayers an effort to raise the concern through the appropriate channels before De Divitiis participated? Public statements could make a claim of unawareness difficult to understand. The recordings and specific financial interests still require review; development interests alone do not establish a conflict on every downtown vote or give Sentance authority to prevent another councillor from voting.**	Specific property ownership and financial effect of each downtown decision
Sentance's knowledge of others' interests	No general duty to declare another councillor's interests is established here. **My public-interest question is whether known concerns about De Divitiis's downtown interests were raised through appropriate channels so that any potential conflict could be assessed before a vote, as discussed above.**	Any specific conduct, shared financial interest or improper assistance

Lead	Established position	What remains unresolved
Brock negotiating representative	Kenny received five ballots and Longo three. My recollection is that Sentance supported Kenny; his individual ballot is not independently documented here. **I also recall receiving confirmation from others who, to my recollection, were visible in the recorded meeting footage. Their presence on camera does not itself verify his ballot; I have not supplied independent documentation of their confirmation.**	Exact motions and amendments; rationale for one representative; evidence of Sentance's individual vote

The chart preserves my questions about known downtown interests and accounts of the Kenny selection. A councillor's property interests require transaction-specific assessment; another councillor has no automatic authority to prevent participation. The reported ballot does not establish Sentance's individual vote. My account and others' confirmation remain uncorroborated. Shared votes alone establish neither improper coordination nor private benefit. [1, 2, 4, 14]

Where Part One overlaps

Part One pages	Use in this report
1–2	Two-term scope and political description of recurring agreement
2–4	Canada Games Park commitments, negotiations and oversight context
7	Parking proposal and dual responsibilities; factual corrections retained
8	Acknowledgment that declarations and constructive contributions exist
10	Source and verification limits; original article is a reference, not corroboration

Questions for Sentance and records for the Clerk

I ask Sentance to explain when withdrawal was required, what advice he sought, how he managed overlapping roles and what authority he exercised in the parking proposal. **A substantive response should be presented fairly alongside the records.**

Conclusion

Part One asked whether confidence in major decisions was matched by scrutiny and follow-through. **Part Two** asks whether overlapping responsibilities were assessed and explained before action.

The declarations and constructive contributions deserve acknowledgment. Unresolved allegations cannot be counted as proven failures, but disclosures on some occasions do not answer questions about others.

What troubles me is the recurring need to reconstruct authority, identify who represented whom, and ask whether safeguards were considered in advance. After two terms, voters should expect explanations supported by records, clear boundaries between roles and evidence that scrutiny is welcomed before public money is committed.

That standard applies equally to Sentance and the councillors I describe as the "UN-FAB FOUR." Each should demonstrate independent judgment and a willingness to challenge allies.

A third term must be earned through the record. Voters should weigh the documented concerns, remaining gaps and any response, and decide whether Sentance's decisions and explanations demonstrate the care and openness Thorold deserves.

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References and verification limits

[1] Nicholas Bozza, Part I of II Ken Sentance, supplied final PDF, 10 pages. Used for overlap and the author's existing accounts; not independent verification.

[2] Ontario, Municipal Conflict of Interest Act, particularly sections 2–5.2. Open source

[3] City of Thorold, Code of Conduct approved October 1, 2019, especially sections 5.6 and 12.1–12.2. Open source

[4] City of Thorold, Declaration of Interest Registry 2022–2026, updated July 16, 2026, pp. 2–5. Open source

[5] City of Thorold, Council minutes March 2, 2021, declaration concerning PWCS2021-16. Search-indexed official text; direct PDF retrieval failed. Open source

[6] City of Thorold, Council Members, current listed appointments. Open source

[7] ThoroldToday, Know your candidates Ken Sentance, October 2, 2026; candidate-supplied statement. Open source

[8] ThoroldToday, McMillan Park will not be getting a turf football field, January 17, 2023. Open source

[9] ThoroldToday, Charter meeting begins a new chapter for Kiwanis Club of Thorold, February 2025. Open source

[10] City of Thorold, special council agenda September 19, 2023, CAO 12-2023 and Bioveld delegation. Open source

[11] ThoroldToday, City Council votes against Thorold South gas plant expansion, September 20, 2023. Open source

[12] ThoroldToday, Thorold council holds off on parking deal with non-profit housing corporation, September 2026. Open source

[13] Civic Lens, July 14, 2026 council meeting index, CLK-C 19-2026. Secondary pointer; original resolution still required. Open source

[14] ThoroldToday, Council commits $7 million to Canada Summer Games, May 22, 2019. Open source

Verification limits: No complete first-term registry or post-July 16, 2026 registry was located. Meeting video was not reviewed. Some official eSCRIBE documents were available only as search-indexed text. The alleged consultant fee, its timing, the spouse's employment connection and certain individual votes remain uncorroborated. No undisclosed statutory financial conflict has been established in this report. My telephone recollections are identified as my accounts.

Disclaimer for the two part series

This two-part series presents my opinions and analysis based on the referenced public records, published reporting, research, conversations with Thorold taxpayers and my identified firsthand recollections. Documented facts, attributed accounts, opinions and unresolved questions should be read in their respective contexts. Commentary and rhetorical questions are not findings of wrongdoing. Matters not independently verified remain questions, not established facts. Shared votes, overlapping roles or an apparent conflict do not, by themselves, establish improper coordination, a breach of conflict-of-interest law or private motives. This is a review of selected matters, not a complete audit or legal determination. Readers are encouraged to consult the original records, consider responses and reach their own conclusions. I welcome documented corrections and substantive responses and will correct material factual errors brought to my attention. Where I recount conversations or events from memory, those passages represent my recollection and may be incomplete; any response from the person concerned will be considered fairly.