

30 September 2025

File No. 5758-27

The Honourable Richard Edjericon, Deputy Speaker
Legislative Assembly of the Northwest Territories
Box 1320, 4570 - 48th Street
Yellowknife, NT X1A 2L9

By email

Dear Mr. Deputy Speaker:

Complaint by Mr. Benjamin Adams about Mr. Shane Thompson, MLA

[1] On 24 June 2025, Mr. Benjamin Adams made a complaint alleging that Mr. Shane Thompson, MLA for Nahendeh, had breached the *Members' Code of Conduct*.

[2] For the reasons set out below, I have dismissed the complaint pursuant to paragraphs (102)(2)(a) of the *Legislative Assembly and Executive Council Act* (the "Act").

[3] This is my report to the Legislative Assembly, which I am directing to you because Mr. Thompson is the Speaker.

A. Background

[4] Mr. Adams is the principal at Liidlii Kue Elementary School in Fort Simpson.

[5] Mr. Thompson's grandson is a student at the school.

[6] The grandson's mother is Mr. Thompson's daughter. She was previously a teacher at the school. There were issues between her and Mr. Adams, and the superintendent of the Dehcho Divisional Education Council (the "DDEC") relocated her to the high school which has a different principal.

[7] The grandson's father is Mr. Thompson's son-in-law. He also had issues with Mr. Adams, and would not interact with him. He arranged with the superintendent

(Ms. Donna Miller-Fry) that Mr. Thompson would be the point of contact with Mr. Adams about the grandson.

[8] Mr. Thompson met with Mr. Adams on December 3, 2024 about the grandson.

[9] On January 8, 2025, Mr. Thompson met with Mr. Adams about the Paul Stipdonk Memorial Soccer Tournament, which Mr. Thompson's daughter was involved in organizing. Mr. Thompson followed up with an email from his personal email account. The email is signed "Shane Thompson, Support Worker for the PaulStidonk".

[10] On April 7, 2025, Mr. Thompson sent an email to the chair of the District Education Authority (the "DEA") supporting the decision which he understood would be made by the DEA that evening asking the superintendent to terminate Mr. Adams' employment.

[11] Later on April 7, 2025, the chair of the DEA sent a letter on its behalf to the superintendent asking her to initiate the process recommending the termination of Mr. Adams' employment, with a copy to the Minister of Education.

[12] On April 8, 2025, using his MLA email account, Mr. Thompson sent a copy of his April 7, 2025 email and a letter on MLA stationery to the chair of the DEA explaining his understanding of the role of the DEA and supporting the decisions it made as an elected body.

B. The Complaint

[13] On June 24, 2025, Mr. Adams sent his complaint to me, using his school email account:

... I am making this complaint as I believe that the Member has contravened the Code of Conduct for members of the legislative Assembly of the Northwest Territories....

The Member's Letter

I am the principal at Liidlí Kue Elementary School ("LKES") in Fort Simpson. During this past school year, starting December 3, 2024, I have been confronted with the Member's interference in the operations of the school, through the Fort Simpson District Education Authority ("DEA"). This interference culminated in a letter sent by the Member in his official capacity, recommending the termination of my employment.

It is my intention in writing this complaint that the Member cease his continuous harassment and interference, to ensure both my personal health and safety, and the operations of the organization and children I serve go without further impact.

On April 7, 2025, the DEA sent a letter to Donna Miller-Fry, DDEC Superintendent of Schools, with a recommendation to proceed with my termination

On April 8, 2025, the Member sent a letter to the DEA ... from his office to support the DEA letter and to assert pressure on Ms. Miller-Fry (the “Member’s Letter”). In sending this letter, the Member, in his capacity as a sitting MLA, inappropriately interfered with my position as principal. It is my understanding that the Member’s actions are closely related to the Members’s [sic] personal relationship with DEA members.

...

The existence of the Member’s Letter has been made available publicly and has tarnished my reputation in the Fort Simpson community.... Public perception is that anything endorsed by the MLA is fact-based and thoroughly researched with professional opinion to back up their recommendations. This was not the case with the Member’s Letter.

...

As a constituent and a professional leader, I believe it is imperative that the Member cease his involvement and interference with my position as principal. I am asking this office to review his personal interests which I believe are targeting my reputation in this small community. This ongoing matter has negatively impacted my mental health, safety, and my ability to operate a school without such negative influence.

[14] Mr. Adams described the background context to the Member’s Letter as being related to the Member’s involvement during the two year period prior to December 3, 2024 with the personal and professional difficulties between Mr. Adams and Mr. Thompson’s daughter, including the Member taking a number of concerns about Mr. Adams’ leadership performance directly to the DDEC.

C. Mr. Thompson’s response

[15] Mr. Thompson’s legal counsel, Steven Cooper, K.C., responded to the complaint on Mr. Thompson’s behalf.

[16] The response noted that:

- The complaint does not specify which provisions in the *Members’ Code of Conduct* Mr. Adams alleges to have been breached.
- In addition, some of Mr. Adams’ letter involves hearsay and statements or actions by third parties that Mr. Thompson cannot be responsible for.

- The superintendent had approved of the arrangement for Mr. Thompson to be the contact person for communications with the principal about the grandson. There was no suggestion that Mr. Thompson was attending the December 3, 2024 meeting in any capacity other than personally, as the student's grandfather; there was no reference to Mr. Thompson's being an MLA. After the meeting, Mr. Adams sent the grandson's father an email mentioning he had had a "good conversation" with Mr. Thompson, and offered to meet in person to discuss supports for the family's children, which the father declined in light of the previous conflict between the two of them.
- On March 29, 2025, Mr. Thompson sought advice from me as the Integrity Commissioner about an email he wished to send to the Minister of Education in his capacity as a grandfather related to the issues his grandchildren were experiencing. The advice received was that such a communication should be sent from Mr. Thompson's personal email account and explicitly state that he was reaching out to the Minister in his capacity as a grandparent.
- Mr. Thompson's April 8, 2025 letter, sent on MLA stationery, was "almost certainly a contravention of the *Code*, but only as far as it was sent in his capacity as an MLA." This was an error of judgment, but he was acting on behalf of his concerned constituents, in good faith.
- Shortly thereafter, Mr. Thompson accepted the Integrity Commissioner's advice that he remove himself from the situation and ask another MLA to deal with any school board-related issues, which decision was communicated to all relevant parties.
- The facts cannot be characterised as a history of harassment by an MLA, but rather are Mr. Adams' grievance with Mr. Thompson's actions taken as a member of the community and as a grandparent. That does not constitute harassment. The present situation also does not fit into any of the types of harassment prohibited in the NWT referenced in the *Code*.

[17] Accordingly, Mr. Cooper submitted that the complaint should be dismissed as being frivolous or vexatious or not made in good faith; any contravention was minor, or was committed through inadvertence, or by reason of an error in judgment made in good faith; and Mr. Thompson took all reasonable measures to prevent a contravention of the *Code*.

D. Mr. Adams' Reply

[18] In reply, Mr. Adams stated that:

- His concern was that Mr. Thompson had breached sections 2, 3, 4 and 6 of the *Members' Code of Conduct*.
- All of Mr. Thompson's involvement was performed inherently in his capacity as an MLA. MLA Thompson's meeting and communications with Mr. Adams (which he purports were done as a concerned grandfather) and his actions in sending the letter (which he purports were done on behalf of concerned constituents) are inextricably linked. The issue is that he did not remove himself from the situation.
- He was not privy to the confidential advice I provided to Mr. Thompson as Integrity Commissioner.
- Harassment is not limited to the types referred to in the *Code*.
- In his capacity as a sitting MLA, Mr. Thompson improperly and publicly interfered in an ongoing workplace matter on behalf of his family.

E. Confidential advice to the Member

[19] Section 98 of the Act provides that a Member may request the Integrity Commissioner to provide advice and recommendations on any matter respecting obligations of the Member under Part 3 of the Act [dealing with conflicts of interest] or the *Code of Conduct*. The advice is confidential, unless the Member waives confidentiality. No proceedings may be taken against the Member where the Member has complied with the advice and recommendations of the Integrity Commissioner.

[20] Given the confidentiality provision, it is not surprising that Mr. Adams would not have been aware of my advice at the time.

[21] Given that Mr. Thompson's response to the complaint referred to my advice, the Act permits me to confirm that:

- In November 2024, I advised Mr. Thompson that as a Member of the Legislative Assembly, his role included hearing and responding to concerns

raised by his constituents, and doing so was not a contravention of the MLAs' *Code of Conduct*.

- In March 2025, I advised Mr. Thompson that he was entitled to make communications in his role as grandparent, but such communications must not be on MLA stationery, be sent through his MLA email account, or refer to his being an MLA.
- In late April 2025, I advised Mr. Thompson that it might be preferable for him to remove himself from this situation, and ask another MLA to deal with school board related concerns in Mr. Thompson's constituency, which he did.

F. Decision

[22] At the outset, I note that the complaint relates to the period starting with the meeting on December 3, 2024 and focuses on Mr. Thompson's letter on MLA stationery dated April 8, 2025. While it is apparent that there is a longer history of issues between Mr. Adams and Mr. Thompson (and his family), I will only deal with events from December 3, 2024.

[23] Sections 2, 3, 4 and 6 of the *Members' Code of Conduct* provide as follows:

Part 2: Principles

2. Members must act lawfully and in a manner that will withstand the closest public scrutiny, upholding the integrity and honour of the Legislative Assembly and its Members. Members shall ensure their conduct does not bring the integrity of their office or of the Legislative Assembly into disrepute.
3. Members must treat members of the public, one another and staff appropriately and without harassment. Members must take all reasonable steps to ensure the work environment is free from harassment.
4. Members must carry out their official duties objectively and without consideration of personal or financial interest, and must arrange their personal affairs so as to maintain the trust and confidence of the public.
- ...
6. Members must give priority to their duties as a Member over all other duties and offices they hold and must dedicate themselves to fulfilling their duty to effectively represent residents of the Northwest Territories.

[24] With respect to Principle 3, a person's disagreement with a school principal—even a prolonged and strident disagreement about whether the principal's employment should be terminated—does not in and of itself constitute harassment, either colloquially or within the meaning of the term in the *Members' Code of Conduct*. Neither the DEA's April 7, 2024 decision to request the superintendent to terminate Mr. Adams' employment nor Mr. Thompson's support for that decision constitutes harassment.

[25] With respect to Principles 2 and 4, I have previously cautioned that there are limits to what an MLA—as an MLA—may do:¹

The lesson to be taken from this unfortunate situation is that there are limits on what a Member may do, and how they may go about what they do. Being a Member is not *carte blanche* to make or repeat unverified and unfounded allegations. Members have an obligation to inform themselves about the facts. It is inappropriate for a Member to orchestrate a campaign for an employee of a public body to be transferred, suspended or terminated.

However, the converse is also true: not everything done by a person who is an MLA is done in that person's capacity as an MLA. People who are MLAs are entitled to have personal and private lives, and are entitled to express their opinions in their personal capacities. Being elected an MLA does not deprive one of one's personal and private life.

[26] In my view, Mr. Thompson erred in sending the DEA chair his April 7, 2024 email using his MLA email account which identified him as an MLA, as well as sending his April 8, 2024 letter on his MLA stationery using his MLA email account. Using these MLA resources and identifiers could reasonably cause recipients to assume that Mr. Thompson was acting in his capacity as an MLA.² The principle in Paragraph 4 of the *Members' Code of Conduct* (and my previous confidential advice) required Mr. Thompson to have sent these communications through his personal email account using his personal stationery:

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1. Patterson complaint against Richard Edjericon, MLA, 8 October 2024.
 2. And would contravene the spirit if not the letter of section 76(2) of the Act:

76(2) A member shall not use an office of the member to seek to influence a decision made by another person to further the private interests of the member or of his or her spouse or dependent child.

Neither Mr. Thompson's daughter nor his grandson is a dependent child, so the letter of section 76(2) does not apply.

4. Members must carry out their official duties objectively and without consideration of personal or financial interest, and must arrange their personal affairs so as to maintain the trust and confidence of the public.

Mr. Thompson concedes that these were errors.

[27] Apart from using his MLA stationery and email account, there is nothing in the content of either of these communications which breaches either the Act or the *Members' Code of Conduct*. As a private citizen, Mr. Thompson was entitled to express the content of those communications.

[28] Section 102(21)(a) of the Act provides as follows:

102(2) After conducting an investigation under section 101, the Integrity Commissioner shall do any one of the following:


- (a) dismiss the complaint, if the Integrity Commissioner determines that
 - (i) the complaint is frivolous or vexatious or was not made in good faith,
 - (ii) there are insufficient grounds to warrant an inquiry,
 - (iii) the complaint does not disclose a contravention of this Part or the Code of Conduct,
 - (iv) a contravention of this Part or the Code of Conduct was minor or was committed through inadvertence or by reason of an error in judgment made in good faith,
 - (v) the member or former member took all reasonable measures to prevent a contravention of this Part or the Code of Conduct, or
 - (vi) the public interest would not be served if the complaint proceeded to an inquiry before a Sole Adjudicator

[29] In my view, Mr. Thompson's contravention of the *Code* was minor and was an error of judgment made in good faith; there are insufficient grounds to warrant an inquiry; and the public interest would not be served if the complaint proceeded to an inquiry in front of a Sole Adjudicator.

[30] Accordingly, I have dismissed Mr. Adams' complaint pursuant to sections 102(2)(a) (ii), (iv) and (vi) of the Act.

[31] I have not recommended the possibility of alternative dispute resolution process under the Act because it is apparent that the issues involve the operation of the school which go beyond the Act or *Code*. Nevertheless, I strongly urge all involved to focus on the needs of the grandchildren, to put them first, and to put aside their respective historical concerns and hurts. This requires honest, open and two-way communication and respect. Everyone owes this to the youth in this small community.

All of which is respectfully submitted by:

A handwritten signature in blue ink, appearing to read 'D. Jones', with a long horizontal flourish extending to the right.

David Phillip Jones, K.C.
NWT Integrity Commissioner

cc: Mr. Glen Rutland, Clerk of the Legislative Assembly at glen_rutland@ntassembly.ca
Mr. Benjamin Adams at badams@ddec.ca
The Hon. Shane Thompson, MLA at shane_thompson@ntassembly.ca
Mr. Steven Cooper, KC. at Steve@cooperregel.ca