

EXEMPTION DECISION 26-01

Kelli Paddon (Board Voice Society of BC)

May 13, 2026

SUMMARY: The applicant is a former member of the Legislative Assembly and served as Parliamentary Secretary for Gender Equity seeking an exemption under section 2.3 of the *Lobbyists Transparency Act* to lobby on behalf of a Board Voice Society of BC, where she is the incoming Executive Director. The Registrar found the applicant is a former public office holder and that it would not be in the public interest to grant the exemption in this case. The Registrar concluded that not everything a non-profit does is in the public interest, and that in this case the applicant's proposed lobbying activities would be in the same sector as her role as Parliamentary Secretary.

Statutes Considered: *Lobbyists Transparency Act*, S.B.C. 2001, c. 42

Authorities Considered: Exemption Decision 22-01, Exemption Decision 25-01

BACKGROUND

[1] The applicant has applied for an exemption, in the public interest, from the two-year cooling-off period that applies to her as a "former public office holder," under s. 2.2 of the *Lobbyists Transparency Act* (LTA).

[2] The applicant is a former Member of the Legislative Assembly and served as the Parliamentary Secretary for Gender Equity from December 7, 2022, to November 18, 2024. According to her application she is the incoming Executive Director of a non-profit organization called Board Voice Society of BC (Board Voice), which she describes as follows:

Board Voice is an umbrella non-profit registered in BC to provide a clear and effective voice for volunteer community-based boards of non-profit

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organizations whose services provide high-quality social services and help build strong, vibrant communities. Our advocacy work primarily involves efforts to see social care and our sector's role in this vital work better understood by the public and policy makers in BC in order to ensure social services are strategized for, outcomes-based, adaptable to individual community needs, and sustained.

[3] In addition to the above description, the applicant has made the following submission which is reproduced in its entirety in support of her application to me:

As the incoming executive director for Board Voice, it is important that I am able to support volunteer boards in advocating to government, and be able to report on any activity. Our volunteer boards support the community organizations that citizens and government depend on to care for the most vulnerable. This 6 month exemption would allow this important work to continue uninterrupted.

DISCUSSION

[4] The two main questions before me are:

- a. Is the applicant a “former public office holder” under the LTA and subject to the two-year prohibition on lobbying that s. 2.2 places on such individuals; and
- b. Should the applicant be granted an exemption from that two-year prohibition?

Is the applicant a former public office holder?

[5] The applicant does not provide any detail except for her former title of Parliamentary Secretary for Gender Equity. Through verification of publicly available information, I have confirmed that the applicant was elected as a Member of the BC Legislative Assembly in the 2020 BC general election¹ and was appointed parliamentary secretary on December 7, 2022,² a position she held until November 18, 2024.³

¹ British Columbia, Elections BC, *Report of the Chief Electoral Officer: 2020 Provincial General Election*, Appendix C: Statement of Votes.

² OIC 657/2022 (BC).

³ OIC 595/2024 (BC).

[6] Section 2.2 of the LTA states:

2.2 Subject to section 2.3, a person who is a former public office holder must not lobby, in relation to any matter, for a period of 2 years after the date the person ceased:

[...]

(b) to be a parliamentary secretary, or

[7] Given the applicant was a parliamentary secretary until November 18, 2024, I find she meets the definition of “former public office holder” and is subject to the restriction at section 2.2.

Should the applicant be granted an exemption from the two-year rule?

[8] In ED 18-01, my predecessor outlined the following factors for determining whether to grant an exemption under s. 2.3, which I endorse and include:

- the applicant’s previous position (both in nature and in duration) under a particular category of s. 2.2 of the LTA;
- the length of time since that position concluded;
- the nature of the proposed undertaking to lobby, including the client and the target(s) of lobbying;
- how the public can be assured that no information or relationships acquired in the previous position will be used in the proposed lobbying;
- why the particular lobbyist, as distinct from some other lobbyist, is proposing to carry out the lobbying;
- how the public will benefit from lobbying activity by the applicant;
- any terms and conditions that might be proposed that would satisfy the Registrar that an exemption would be in the public interest.⁴

[9] In my view, the applicant’s submission does not contain persuasive information related to the above-listed factors.

[10] The Applicant was working as a parliamentary secretary in the social sector, and now proposes to lobby on behalf of some organizations in that sector. This is different from, for example ED 22-01, where the applicant moved from the Ministry of Finance to a non-profit, and

⁴ ED 18-01, para 38.

stated in their submissions they would be prepared to accept conditions on their lobbying efforts to prevent that applicant from lobbying in areas that applicant had worked previously.

[11] The applicant also infers through their submission that the public will benefit from the proposed lobbying activities, because of the focus on social services that Board Voice represents. While I take it at face value that the organizations Board Voice represents benefit those people they serve, I draw a distinction between the operational impact of those organizations and the kind of work at the funding or policy level. Without the benefit of a more detailed explanation of how the applicant's lobbying activity will benefit the public, I am not persuaded by this factor either.

[12] The applicant does infer through their submission that they are at the last six months of the two-year prohibition, which weighs in favor of granting the exception.

Is there a private advantage?

[13] In ED 25-01, the applicant made an argument, which I accepted, that the above factors were not necessary to analyze in detail because of the applicant was moving from one government owned body to another, and so the underlying premise intended by the legislation of preventing individuals from marketing information and relationships gained at public expense for private advantage was not present.

[14] While not a ground specifically advanced by the applicant, I infer a similar argument based on their description of the work of the organization she is asking to lobby for. That argument is essentially that the same logic should apply to the applicant's work for an organization that advances socially beneficial causes.

[15] In this case, while a private advantage may not be present in the sense of a for-profit enterprise, a private advantage can still exist in the non-profit sector. The organization the applicant proposes to lobby for appears to be an umbrella organization for a number of organizations, many of which likely receive public funding. The "private advantage" in this case then would be that the applicant, leveraging their time in office, may be able to secure benefits for her organization and its members that might not be available to other organizations competing for the same public funding. While this form of private benefit may not involve material gain in the form of profit, it is not sufficient to imply that because Board Voice represents non-profit organizations in the social sector, anything it does must inherently be in the broad public interest, as observed by my predecessor in ED 22-01.

[16] In that way, the premise underlying the two-year rule is still engaged here, even if describing as a "private" benefit may not be the most apt descriptor.

[17] Overall, the applicant has not satisfied me there are sufficient grounds to depart from the general prohibition on lobbying for former public office holders.

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[18] For the above reasons, the applicant's request for exemption of under s. 2.2 of the LTA is denied.

Date: May 13, 2026

ORIGINAL SIGNED BY

Michael Harvey
Registrar of Lobbyists for British Columbia