

10 June, 2026

Commissioner Nancy Bélanger  
Office of the Commissioner of Lobbying of Canada  
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Ottawa, Ontario K1R 1B7

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## **Re: Billy Bishop Toronto City Airport Lobbying on Behalf of Nieuport**

Commissioner Bélanger,

Please accept this as a formal request that the Office of the Commissioner of Lobbying of Canada initiate an investigation of all lobbying of the federal government (including but not limited to the Ministry of Transport, Transport Canada and the Toronto Port Authority) regarding the future of and regulations applicable to the Toronto Island Airport (officially, the “Billy Bishop Toronto City Airport”). This investigation should include, though not necessarily be limited to:

1. All instances of In-house Corporation lobbying conducted on behalf of Nieuport Aviation Infrastructure Partners GP and Nieuport Aviation, between January 1, 2015, and May 29, 2026, whether by Nieuport’s Responsible Officers Jennifer Quinn and Neil Pakey, or other Nieuport employees, investors, or directors,
2. All instances of Consultant Lobbying conducted on behalf of Nieuport Aviation Infrastructure Partners GP and/or Nieuport Aviation between January 1, 2015, and May 29, 2026, by the following:
  - a. Marsha Seca, and Broad View Advisory Inc.,
  - b. Erin Bonokoski, Eris Fino, and Crestview Strategy Inc., and
  - c. Kim Wright, and Wright Strategies.

We are making this request because the facts reported in the *Toronto Star* on May 29, 2026, regarding some or all of these lobbying activities, and those contained in the linked, publicly available documents (together referred to hereinafter as the “*Toronto Star* Investigation”) seem *prima facie* to amount to a breach of Canada’s *Lobbying Act* (R.S.C., 1985, c. 44 (4th Supp)) (hereinafter “the federal Lobbying Act”).

### **Lobbyists for Nieuport Aviation Were and Are Required to Report that J.P. Morgan Asset Management Controls Nieuport**

Based on the facts reported in the *Toronto Star* Investigation, **individuals or persons or organizations engaged in Consultant Lobbying on behalf of Nieuport Aviation Infrastructure Partners GP & Nieuport Aviation** (hereinafter “Nieuport”) would have been **legally obliged to disclose in their mandatory s. 5 “returns” that their client was controlled by the U.S.-based JP Morgan Asset Management.**



First, all Consultant Lobbyists are required under the federal lobbying act to file a public return revealing the names of any person(s) or organization(s) who direct or control their client, if they have a direct interest in the outcome of the lobbying activity. Section 5 (2) (b) of the *Act* mandates that:

“The return shall set out... (b) the name and address of the client and the name and business address of any person or organization that, to the knowledge of the individual, controls or directs the activities of the client and has a direct interest in the outcome of the individual’s activities on behalf of the client;”

While the language applicable to In-House Corporation Lobbying is different, it has the same meaning. Section 7(3)(b.3), requiring that the officer filing in-house lobbying returns disclose publicly, in those returns:

“If the employer is a corporation that is a subsidiary of any other corporation, the name and business address of that other corporation”

Under both the Ontario *Business Corporations Act* and the *Canada Business Corporations Act*, both the level of control described in the *Toronto Star* Investigation and the level of ownership described would seem necessarily to make Nieuport a subsidiary of the J.P. Morgan. In particular, s. 1(2) of the *Business Corporations Act*, R.S.O. 1990, c. B.16 prescribes that:

“a body corporate shall be deemed to be a subsidiary of another...if... (a) it is controlled by (1) that other, or (ii) that others and one or more bodies corporate each of which is controlled by that other, or (iii) two or more bodies corporate each of which is controlled by that other: or (b) it is a subsidiary of a body corporate that is another’s subsidiary.”

Likewise, pursuant to the *Canada Business Corporations Act*, R.S.C. 1985, c. C-44, a similar definition applies. A corporation is a subsidiary of another corporation if:

2(2) (5):(a) it is controlled by (i) that other body corporate, (ii) that other body corporate and one or more bodies corporate each of which is controlled by that other body corporate, or (iii) two or more bodies corporate each of which is controlled by that other body corporate; or (b) it is a subsidiary of a body corporate that is a subsidiary of that other body corporate

Even if Nieuport Aviation is, strictly speaking, not a corporation itself, this mandate would seem to apply to any corporate entity that is a component of the partnership (or, in turn, of a component of a component).

Second, according to the facts as reported in the *Toronto Star* Investigation, including linked documents of reports to its own investors, J.P. Morgan does seem to control/direct and to have a direct interest in Nieuport, and thus in any decision affecting passenger volumes and future operations of the Toronto Island Airport. The *Toronto Star* Investigation reports that Nieuport is one asset, among many, wholly controlled by something called the Infrastructure Investments Group (IIG). The report indicates that IIG was founded by JP Morgan in 2006, is staffed entirely by JP Morgan employees and run out of JP Morgan offices, primarily in New York, as something akin to an in-house private equity fund. The *Toronto Star* Investigation states that:



- “All of the executives at the airport serve at the direct pleasure of JP Morgan,” and that
- “If JP Morgan wants a new CEO in there, JP Morgan can unilaterally make those changes.”
- “A JP Morgan executive, Hai-Gi Li, is ‘primarily responsible for the day-to-day management’ of the terminal, according to Nieuport’s own website.
- “JP Morgan Asset Management stands to gain, significantly, if the federal and provincial governments agree to go forward with an airport expansion plan. More passengers equals more revenue and in the long run a more valuable asset.”

While it is the federal Toronto Port Authority that owns and controls the Toronto Island Airport itself, there can be no doubt that Nieuport’s ownership of the passenger terminal, and its existing and potential contractual arrangements described in the *Toronto Star* Investigation would give it a direct interest in any decision affecting passenger volumes and/or future operations of the Toronto Island Airport, and all of the matters which were the subject of the lobbying referred to above. Given J.P. Morgan control and interest in Nieuport described in the *Toronto Star* Investigation, it would also have a clear direct interest in any decision affecting passenger volumes and future operations of the Toronto Island Airport.

### **Lobbyists for Nieuport Aviation Did Not Report that J.P Morgan Asset Management Controls Nieuport**

According to the facts reported in the *Toronto Star* Investigation and those posted on the Registry of Lobbyists itself, J.P. Morgan’s control over Nieuport was *not* reported as required under the federal Lobbying Act.

On the contrary:

- The Client Details page “Nieuport Aviation Infrastructure Partners GP / Marsha Seca, Consultant” Registration Number 949106-369557, which appears to correspond to the Return required under s. 5 of the federal Lobbying Act, claims explicitly that “The activities of Nieuport Aviation Infrastructure Partners GP are not controlled or directed by another individual, organization or corporation with a direct interest in the outcome of this undertaking.”
- The Client Details page “Nieuport Aviation / Erin Bonokoski, Consultant” Registration Number 954634-379242 claims explicitly that “The activities of Nieuport Aviation Infrastructure Partners GP are not controlled or directed by another individual, organization or corporation with a direct interest in the outcome of this undertaking.”
- The In-House Corporation Details page “Nieuport Aviation / Jennifer Quinn, CEO” claims explicitly that “Nieuport Aviation is not a subsidiary of any other parent companies.”
- The Client Details page “Nieuport Aviation Infrastructure Partners GP / Erlis Fino, Consultant” Registration Number 954635-379235 claims explicitly that “The activities of Nieuport Aviation Infrastructure Partners GP are not controlled or directed by another individual, organization or corporation with a direct interest in the outcome of this undertaking.”



- The Client Details page “Nieuport Aviation Infrastructure Partners GP / Kim Wright, Consultant” Registration Number 781710-378266 claims explicitly that “The activities of Nieuport Aviation Infrastructure Partners GP are not controlled or directed by another individual, organization or corporation with a direct interest in the outcome of this undertaking.”

Pursuant to s. 14(1) of the federal Lobbying Act, it is an offence to fail to “file a return as required under subsection 5(1) or (3) or 7(1) or (4)” or to give any “false or misleading statement in any return or other document submitted to the Commissioner under this Act.”

Environmental Defence urges the Commissioner of Lobbying to immediately begin an investigation and prepare and present to Parliament and all Canadians, on an urgent basis, a detailed and comprehensive report publicizing in detail:

- the identity of all Nieuport’s investors,
- the specifics of how it is controlled,
- the commissioner’s determination of whether there has been a breach of the federal Lobbying Act and/or the Lobbyist’s Code of Conduct and of who or what entities, specifically, committed the breach,
- the full content of lobbying communications pertaining to the Toronto Island Airport between the federal government and Nieuport or any other entity,
- the specific identities of all individuals who sent or engaged in or received lobbying communications.

Recent statements from Ontario’s Provincial Government clearly indicate that *some* entity intends to promulgate, and to pressure the federal government to propose (through the *Toronto Port Authority*) the addition of a jet runway at the Toronto Island, to amend the *Tripartite Agreement* to remove the prohibition on jets at the Toronto Island Airport, and to provide the federal approvals for such a jet runway to be built. Given the grave implications these actions would have, and the possible imminence of at least some decisions (e.g., *Toronto Port Authority* appointments) bearing upon the Toronto Island Airport, there is a compelling public interest in ensuring full transparency regarding any lobbying.

Sincerely,

Phil Pothen, J.D., M.L.A.

Counsel, Environmental Defence