



Stephen Aylward
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June 4, 2019

Delivered by email clerk@toronto.ca

Uli S. Watkiss
City Clerk's Office
Toronto City Hall
100 Queen Street West, 13th Floor
Toronto, ON M5H 2N2

Delivered by email candidateinfo@toronto.ca

City of Toronto Election Services
100 Queen Street West
1st Floor N
Toronto, ON M5H 2N2

Delivered by email councillor_karygiannis@toronto.ca

Councillor Jim Karygiannis
Toronto City Hall
100 Queen Street West, Suite A1
Toronto, ON M5H 2N2

Dear Ms. Watkiss, City of Toronto Election Services and Councillor Karygiannis:

Re: Application for a compliance audit of the campaign finances of Councilor Jim Karygiannis in respect of the 2018 election

We are counsel to Adam Chaleff, the applicant in the above noted matter. Please find enclosed an application form under s. 88.33(1) of the *Municipal Elections Act* regarding the campaign finances of Councillor Jim Karygiannis in connection with the 2018 municipal election for the City of Toronto.

Please let me know if I can provide any further information at this time. We look receiving notice of the meeting of the compliance audit committee.

Yours truly,

A handwritten signature in black ink, appearing to read "Stephen Aylward".

Stephen Aylward
SA/ac

Encl.



Application
Compliance Audit

Instructions:

Under the Municipal Elections Act, 1996, an elector may apply for a compliance audit of a candidate or registered third party advertiser's election campaign finances.

To apply for a compliance audit of a councillor candidate, mayoral candidate or registered third party advertiser:

- Complete this form.
- Submit this form and any supporting documents in person or by mail to Election Services, 100 Queen Street W, 1st floor N, M5H 2N2, or by e-mail to candidateinfo@toronto.ca.

Election Services must receive this form by the deadline(s) in s.88.33(3) of the Municipal Elections Act, 1996.

Applicant Details

Last Name or Single Name <input type="checkbox"/> I have a legally registered single name		First Name	
Chaleff		Adam	
Address (qualifying address in the City of Toronto)	Unit	City	Postal Code
141 Dewhurst Blvd		East York	M4J 3K1
Mailing Address (if different than qualifying address)	Unit	City	Postal Code
Home Phone	Business Phone	Cell Phone	
		(647) 300-5193	
Email adamcf@gmail.com			

Candidate/Registered Third Party Advertiser Details

Individual Last Name or Single Name	First Name
Karygiannis	Jim
Organization Name (if corporation or trade union)	
n/a	
Registered for (check box that applies) <input type="checkbox"/> Mayor <input checked="" type="checkbox"/> Councillor <input type="checkbox"/> Third Party Advertiser	
Ward:	
Set out the reasons for your belief that the candidate or registered third party advertiser has contravened a provision of the Municipal Elections Act, 1996 relating to election campaign finances (attach additional pages if necessary)	
Please see attached.	
I believe on reasonable grounds that the candidate or registered third party noted above has contravened a provision of the Municipal Elections Act, 1996, relating to election campaign finances.	
Signature of Applicant	Date (yyyy-mm-dd)
	2019-06-04

Filing

Received By JULIE AMOROSO	Date Received (yyyy-mm-dd) 2019-06-04
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The personal information on this form is collected under the authority of the Municipal Elections Act, S.O. 1996, Chap. 32 Sched. ss. 88. This information is used for the purpose of applying for a compliance audit of a candidate's or registered third party advertiser's election campaign finances. Your information will be filed with the City Clerk and will be available online through the Toronto Meeting Management Information System (TMMS) and for public inspection by any person at the City Clerk's Office at a time when the office is open. Questions about this collection can be directed to Project Manager, 89 Northline Rd., Toronto, ON M4B 3G1 or by phone at 416-338-1111.

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CITY OF TORONTO COMPLIANCE AUDIT COMMITTEE

IN THE MATTER OF an Application under s. 88.33(1) of the *Municipal Elections Act, 1996*
(the “Act”);

B E T W E E N:

ADAM CHALEFF

Applicant

- and -

JIM KARYGIANNIS

Respondent

**BRIEF OF SUBMISSIONS AND SUPPORTING DOCUMENTS
OF THE APPLICANT, ADAM CHALEFF**

June 4, 2019

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Lawyers for the Applicant

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AND TO: **CITY OF TORONTO ELECTION SERVICES**
100 Queen Street West
1st Floor N
Toronto, ON M5H 2N2

Email: candidateinfo@toronto.ca

AND TO: **COUNCILLOR JIM KARYGIANNIS**
Toronto City Hall
100 Queen Street West, Suite A1
Toronto, ON M5H 2N2

Tel: 416-392-1374
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WRITTEN SUBMISSIONS OF THE APPLICANT

1. This is an application to the Compliance Audit Committee (the “Committee”) of the City of Toronto for a compliance audit of the campaign finances of Councillor Jim Karygiannis (the “Candidate”) arising from the audited Form 4 – Financial Statement filed by his campaign on March 27, 2019 in connection with his campaign for City Councillor for Ward 22 (Scarborough-Agincourt) in the 2018 municipal election for the City of Toronto.
2. The applicant, Adam Chaleff, was an elector entitled to vote in the election. Upon his review of the audited financial Statement filed by the Candidate, the applicant formed reasonable grounds to believe that the Candidate engaged in serious and repeated violations of campaign finance laws under the Act.
3. The Candidate raised over \$217,000 for his campaign, an amount that greatly exceeded his general spending limit of \$61,207.95 (the “General Spending Limit”), and well over the amounts raised by other candidates. While his audited financial statement reports campaign expenses of just \$43,812.55, there are reasonable grounds to believe that this is an artificially deflated number. When properly accounted for, the Candidate exceeded the General Spending Limit by almost \$80,000 (more than doubling the Campaign Spending Limit). It further appears that the Candidate exceeded the spending limit on voter appreciation activities of \$6,120.80 prescribed under s. 88.20(9) of the Act (the “Voter Appreciation Spending Limit”) by over \$20,000. The combined spending limit for the Candidate’s campaign (the “Combined Spending Limit”), which combines the General Spending Limit and the Voter Appreciation Spending Limit, was \$67,418.65. It appears that the Candidate exceeded the Combined Spending Limit by almost \$100,000.

4. The applicant has three main concerns regarding the Candidate's compliance with the Act. First, the Candidate paid "honoraria" to supporters totalling \$81,000. The audited financial statement classifies these payments as having been incurred after voting day (and thus being exempt from the General Spending Limit). By contrast, the audited financial statement reports \$0 for salaries and honoraria incurred prior to voting day. There are reasonable grounds to believe that these "honoraria" were in substance payment for services rendered prior to voting day and should have been accounted for as such.

5. Second, there are reasonable grounds to believe that the Candidate misclassified expenses of \$13,611.36 for mailing promotional material. The available evidence suggests that the mailer, which was sent to 36,000 households, was primarily a promotional flyer with only an incidental fundraising purpose. As such, the mailing costs should have been classified under "brochures/flyers" (which are subject to the General Spending Limit) and not as "fundraising costs" (which are not subject to the General Spending Limit).

6. Third, there are reasonable grounds to believe that the Candidate misclassified a voter appreciation event as a fundraising event in order to circumvent the Voter Appreciation Spending Limit. The "fundraising event" was held on December 21, 2018, i.e. two months after voting day, at a time when the Candidate's campaign had a considerable cash surplus. The event, which cost over \$27,000, succeeded in raising \$0. It appears likely that this event was not a fundraising event at all, but rather a voter appreciation event that exceeded the Voter Appreciation Spending Limit by over \$20,000.

PART I - STANDARD FOR ORDERING A COMPLIANCE AUDIT

7. In order to grant the application for the compliance audit, the Committee must consider whether the elector has reasonable grounds to believe that the Candidate contravened the provisions of the Act related to campaign finances. The standard is lower than balance of probabilities.¹

8. Section 88.33(1) of the Act states that an elector who has “reasonable grounds” to believe that a candidate has contravened a provision of the Act relating to election campaign finances may apply for a compliance audit of the candidate’s election campaign finances. The Ontario Court of Justice has described the standard as follows:

[W]here the statute requires “a belief on reasonable grounds,” the jurisprudence applicable in other contexts indicates that the standard to be applied is that of an objective belief based on compelling and credible information which raises the “reasonable probability” of a breach of the statute. The standard of a “prima facie case” in either its permissive or presumptive sense is too high a standard.²

9. Therefore, the Committee is required to evaluate all audit requests on the basis of whether there is a “reasonable probability” of a breach of the statute.³ It is a lower standard that “envisions a practical, non-technical and common-sense probability as to the existence of the facts and inferences asserted.”⁴ Notably, “speculation, suspicion and conjecture fall short of [the reasonable probability] standard.”⁵ In the context of other sections of the Act, reasonable grounds or reasonable probability requires “[t]hat objective credible basis must be

¹ *Lancaster v. St. Catharines (City)* 2013 ONSC 7631 at para 79, Applicant’s Authorities Tab 1.

² *Lyras v. Heap*, 2008 ONCJ 524 at p. 7, Applicant’s Authorities Tab 2.

³ *Gunn v. Halton District School Board*, 2012 ONCJ 684 at para 49, Applicant’s Authorities Tab 3.

⁴ *Ibid.* at para 41.

⁵ *Kett v. The Corporation of the Township of Scugog*, 2019 ONSC 942 (discussion of the standard in the context of Section 58 of the Act), Applicant’s Authorities Tab 4.

found in evidence and not speculation, conjecture or conspiracy theory.”⁶ In short, the standard required for a compliance audit is not an exacting one.

PART II - THE IMPROPER HONORARIUM PAYMENTS

A. Facts

10. The Candidate declared in his audited financial statement that the statement and attached supporting schedules are “true and correct”.⁷

11. Under “expenses subject to general spending limit”, the audited financial statement reports \$0 under the category “salaries, benefits, honoraria, professional fees incurred until voting day”.

12. Under “expenses not subject to spending limits”, the audited financial statement reports \$81,000 under the category “salaries, benefits, honoraria, professional fees incurred after voting day”.

13. The Candidate filed a print-out of a spreadsheet listing the names, dates, and amounts associated with each of the payments of the “honoraria”.⁸ The spreadsheet is reproduced below for ease of reference:

	Date	Ref #	Payee & remarks	Honorarium honorarium
1	1-Dec-18	43	Joanne Fusillo-Ademaj	5,000.00
2	2-Dec-18	42	John Kalina	4,000.00
3	6-Dec-18	41	Gwen Mackay	5,000.00
4	19-Nov-18	35	Nick Bibassis	3,000.00

⁶ *Ibid.* at para. 40.

⁷ Form 4 Financial Statement of Councillor Jim Karygiannis filed March 27, 2019, Applicant’s Submissions Brief, Tab 1.

⁸ Spreadsheet of Honoraria Payments, Applicant’s Submissions Brief, Tab 2.

5	14-Nov-18	34	Leobardo Ahumada	2,000.00
6	15-Nov-18	27	Leung Ting Wai	4,000.00
7	3-Nov-18	20	William Dynes	2,000.00
8	26-Oct-18	14	Berj Hajenian	1,000.00
9	30-Oct-18	23	Wang Peng Fei	5,000.00
10	5-Nov-18	25	Xie Shilang	10,000.00
11	16-Nov-18	28	Kevin Haynes	5,000.00
12	10-Nov-18	26	Jasmine Mann	3,000.00
13	30-Oct-18	18	Satnam Singh Mahil	5,000.00
14	30-Oct-18	19	Gurmit Kavr	5,000.00
15	30-Oct-18	17	Vinod Bains	5,000.00
16	29-Oct-18	16	Adnan Tahir	2,000.00
17	26-Oct-18	13	Rui Zeng	2,000.00
18	3-Nov-18	22	Hayas Yaran	6,000.00
19	5-Nov-18	21	Leung Ting Wai	3,000.00
20	12-Nov-18	24	Leung Ting Wai	3,000.00
21	28-Jan-19	54	HAGOL IMASDONUNIAN	1,000.00
Total				81,000.00

14. The spreadsheet shows that the Candidate made 21 payments to 19 supporters totalling \$81,000. These included three payments totalling \$10,000 to one supporter, Leung Ting Wai. The payments were made from October 26, 2018 to January 28, 2019. The payment on January 28, 2019 was made one month after end of the campaign period (note that under the Act, no election expense can be incurred after the end of the campaign period, which in this case was December 31, 2018).⁹

15. The applicant has inspected the binder containing all of the supporting materials for the Candidate's audited financial statement filed with the City of Toronto. There were no agreements, invoices, timesheets, receipts, or any other documentation as back-up for the payment of the "honoraria".

⁹ Sections 88.20(2) and 88.24(1)2 of the Act.

16. The applicant has conducted internet searches of the names of the recipients of the “honoraria”, which suggests the following:

- Joanne Fusillo-Ademaj (paid \$5,000) is senior legislative assistant to Councillor Karygiannis;
- Kevin Haynes (paid \$5,000) is a constituency assistance to Councillor Karygiannis; and
- Gwen Mackay (paid \$5,000) was executive assistant to former Councillor Glenn De Baeremaeker.

17. When questioned by reporters about the honorarium payments, the Candidate has reportedly made the following statements:

- “The honoraria were given to people that helped us transition from the 44 wards to the 25 wards — people picking up signs, cleaning up signs, doing the data ... fixing the database that was there. It was a database that was all over the map.”¹⁰
- “[The Candidate] said the honoraria were given to those who assisted his team by providing legal advice, connected his team to “community stakeholders,” helped with collecting and cleaning election signs and provided other services.”¹¹

B. Legal Framework

18. Salary expenses are subject to the General Spending Limit prescribed under s. 88.20(6) of the Act. However, the General Spending Limit applies only to election expenses incurred prior to voting day (October 22, 2018). Candidates may incur election expenses after voting day provided that they do so before the end of the campaign period (December 31).¹²

¹⁰ David Nickle, “Scarborough Councillor Raised \$150,000 Over Spending Limit in Toronto Election” *The Toronto Star*, May 9, 2019, Applicant’s Submissions Brief Tab 3 online: https://www.thestar.com/news/city_hall/2019/05/09/scarborough-councillor-raised-150000-over-spending-limit-in-toronto-election.html

¹¹ Sue-Ann Levy, “Councillor used campaign funds to pay supporters \$81Gs” *The Toronto Sun*, May 22, 2019, Applicant’s Submissions Brief Tab 4, online: <https://torontosun.com/news/local-news/levy-councillor-uses-campaign-funds-to-pay-supporters-81k>

¹² Sections 88.20(2) and 88.24(1)2 of the Act.

19. The timing of an expense is dictated by when the expense is “incurred” not when it is paid. The 2018 Candidates’ Guide states that “[a]n expense subject to the general spending limit that was incurred prior to voting day but not paid for until after voting day is still subject to the limit”.¹³ This is consistent with the ordinary meaning of the word “incur”, which is “to suffer or bring on oneself a liability or expense”, a definition that emphasizes that a liability is “incurred” when it arises not when it is paid.¹⁴

20. The expense category “salaries, benefits, honoraria, professional fees” is set out in Form 4, which is the form prescribed by regulation under the Act.¹⁵ The term “honoraria” is not defined under the Act or the regulations. The plain meaning of the term “honoraria” is a “recompense for service rendered” or “an honorary reward”.¹⁶ The term is thus capable of meaning either compensation for services rendered (similar to a salary) or an act of appreciation for services rendered. In the former case, the expense must be said to be incurred when the services are rendered (and not merely when they are paid, as the 2018 Candidates’ Guide makes clear).¹⁷

21. The Act does not prescribe an explicit spending limit for expenses incurred after voting day. However, the Act does place other limits on how campaign funds can be spent after voting day. Under s. 88.22(1)(c), campaign funds must be used exclusively for purposes of a Candidate’s campaign. Since the campaign must cease operations at the end of the campaign period, the only legitimate expenses that can be incurred following voting day

¹³ 2018 Candidates’ Guide for Ontario municipal council and school board elections, at p. 33, Applicant’s Authorities Tab 5.

¹⁴ *Black’s Law Dictionary*, Applicant’s Authorities Tab 6.

¹⁵ *General*, O. Reg. 101/97.

¹⁶ *Vladicka v. Calgary Board of Education* (1974), 1974 CarswellAlta 54 (Alta. S.C.) at paras. 24-27, Applicant’s Authorities Tab 7.

¹⁷ 2018 Candidates’ Guide, pp. 24, 33, Applicant’s Authorities Tab 5.

relate to the cost of winding-up the campaign (and voter appreciation events up to the Voter Appreciation Spending Limit).

22. This is not a mere technicality. Individuals who donate to municipal campaigns for the City of Toronto receive generous rebates from the City worth up to 75% of the value of their contribution.¹⁸ This places candidates in a position of a trustee over public funds, which can be used only for the specific purposes authorized by the Act. For this reason, the Act requires any surplus funds held by a campaign at the end of the campaign period to be paid to the City.¹⁹

C. Application to the Candidate

23. There are reasonable grounds to believe that the honorarium payments were misclassified in the audited financial statement in an attempt to circumvent the General Spending Limit.

24. To the extent that the public statements by the Candidate suggest that these were costs related to winding-up his campaign (such as removing election signs), that explanation is not plausible. The campaign period ran from May 1 to December 31, with voting day on October 22. A candidate may not incur election expenses prior to the campaign period.²⁰ The purpose of a campaign is to secure the election of a candidate. As such, the vast majority of the work to be done (and expenses to be incurred) must occur prior to voting day. The Candidate's other expenses reflect this common sense proposition and they are reasonably proportioned

¹⁸ Section 88.11(1) of the Act; City of Toronto By-Law 1085-17 (Contribution Rebate By-Law), Authorities Tab 8.

¹⁹ Section 88.31 of the Act.

²⁰ Section 88.20(2) of the Act.

between pre-voting day and post-voting day. For example, prior to voting day the Candidate incurred \$9,865.23 in office expenses, but only \$3,858.27 after voting day.

25. By contrast, the audited financial statement reports that during the campaign and prior to voting day, the Candidate disclosed *zero* dollars for “salaries, benefits, honoraria, professional fees”. This contrasts with \$81,000 in such expenses purportedly incurred after voting day. That is nearly twice the total of pre-voting day expenses for all categories (\$43,812.55). The Candidate’s spending pattern is highly unusual when compared with the successful candidates in the other 24 wards. The applicant has reviewed the filings for each of these candidates and determined that only one of them greater expenses on “salaries, benefits, honoraria, professional fees” in the post-voting day period.²¹

26. There are two possible alternative explanations for the honoraria: they were either compensation for services rendered prior to voting day (subject to the General Spending Limit) or they were gratuitous payments to the Candidate’s supporters. In either case, the payments would be illegal.

a. First Alternative: Compensation for Pre-Voting Services

27. To the extent that the honorarium payments were compensation for services rendered, it is likely that the services in question were rendered, at least in large part, prior to voting day. This is most obvious for the earliest payments, which began on October 26, just days after voting day, but likely holds true for the others as well given that the balance of work to be done on an election campaign occurs prior to voting day rather than after voting day.

²¹ Councillor Matlow’s disclosure indicates \$4,400 spent on that category in the post-voting day period.

28. One possible explanation for the mismatch between pre-voting day and post-voting day salary expense is that all labour on the campaign prior to voting day was on a volunteer basis, i.e. the 19 supporters were volunteers on the Candidate's campaign until voting day but were remunerated for their labour after voting day. But this explanation is implausible as a factual matter and from a legal perspective is not consistent with the Candidate's obligations under the Act. The Candidate has not filed any agreements, invoices, or other documentation to support this explanation. If the supporters were willing to work on a volunteer basis prior to voting day then there is no reason to doubt they would have continued to do so after voting day. To the extent that the Candidate wished to recognize the contributions of his supporters to his campaign by making an honorarium payment, those payments must be understood as recognition for all of the services rendered to the campaign, not just those rendered after voting day.

29. Indeed, to allow a candidate to allocate compensation so that it only applies to post-voting day labour would vitiate the campaign finance provisions of the Act. Individuals could "volunteer" their time in the pre-voting period for a candidate, secure in the knowledge that their good works would be duly rewarded in the post-voting period. This would give candidates with financial wherewithal a major advantage over other candidates. The Act simply does not permit this type of accounting.

b. Second Alternative: Illegal Voter Appreciation Payments

30. The other alternative is that the payments were made to supporters as a gesture of appreciation for their support without any particular connection to services rendered. It is possible that the Candidate, having raised over \$150,000 more than the General Spending

Limit, found himself with a large surplus after voting day. Rather than paying the surplus to the City (as required under s. 88.31 of the Act), he sought a way to pay the money out to his supporters.

31. This explanation solves the timing problem identified above. If the payments were gratuitous payments of appreciation without connection to any particular services rendered, then it can be said they were in fact incurred after voting day. However, this explanation faces two other problems.

32. First, it is doubtful that this would be a proper election expense at all. As noted above, candidates can only use campaign funds for campaign purposes. Gratuitous payments to supporters made after voting day would not on its face appear to be an expense made for the purposes of the campaign. An interpretation of the Act that permitted gratuitous payments to supporters would render meaningless the requirement to pay surplus funds over to the City.

33. Second, if the payments were not made as compensation for services, then they would amount to an “expression of appreciation”. But “expressions of appreciation” are subject to the Voter Appreciation Spending Limit in s. 88.20(9). In this case, the honoraria totalled \$81,000, which greatly exceeded the \$6,120.80 Voter Appreciation Spending Limit. The 2018 Candidates’ Guide clarifies that the Voter Appreciation Spending Limit is intended to be used for voter appreciation parties and for token gifts to supporters (rather than large cash payments).²²

²² 2018 Candidates’ Guide for Ontario municipal council and school board elections, at p. 24, Applicant’s Authorities Tab 5.

PART III - MISCLASSIFIED FUNDRAISING EXPENSES

34. There are reasonable grounds to believe that the Candidate misclassified two expenses as fundraising expenses in order to circumvent the General Spending Limit and/or the Voter Appreciation Spending Limit.

A. Promotional Flyer Misclassified as Fundraising Expense

35. Schedule 2 to the audited financial statement lists a number of expenses for fundraising activities that are not subject to the General Spending Limit. Among other expenses, it lists a “Mailing” expense of \$10,289.16 and a “Geko Invitations/Flyers/Brochures” expense of 322.20. Both expenses are claimed in relation to a fundraising barbeque held on September 9, 2018.

36. The applicant has inspected the supporting documents filed by the Candidate and identified the documents that correspond to these expenses:

- Geko invoice dated August 31, 2018 for \$3,322.20 for printing 36,000 items described as ““On October 22, Vote” – Fund Raising FORM”²³
- Canada Post Receipt dated August 27, 2018 for \$5,338.89 for mailing 38,412 items;²⁴
- Canada Post Receipt dated August 31, 2018 for \$4,950.27 for mailing 35,616 items;²⁵

**Note: the total of the two Canada Post receipt amounts is equal to the amount claimed on Schedule 2 of the audited financial statement (\$5,338.89 + = \$10,289.16)*

37. According to the 2016 Census, the federal electoral district of Scarborough-Agincourt (which corresponds to boundaries of Ward 22) comprised 36,712 private dwellings occupied by usual residents.²⁶

²³ Geko Invoice dated August 31, 2018 Applicant’s Submissions Brief Tab 5.

²⁴ Canada Post Receipt dated August 27, 2018 Applicant’s Submissions Brief Tab 6.

²⁵ Canada Post Receipt dated August 31, 2018 Applicant’s Submissions Brief Tab 7.

38. Certain fundraising expenses are not subject to the General Spending Limit. Thus, s. 88.20(8) of the Act exempts “the cost of holding fund-raising functions” from the General Spending Limit. However, s. 88.19(4)(b) provides that the “cost of holding fund-raising functions” does not include “promotional materials in which the soliciting of contributions is incidental”. The 2018 Candidates’ Guide further clarifies that “[a]ny materials, events or activities must have fundraising as the primary purpose in order to be exempt from the spending limit. An incidental mention of contributions is not enough to qualify as fundraising”.²⁷ “Brochures/flyers” is prescribed as a separate category of expense under Form 4 which are counted against the General Spending Limit.

39. In this case, there are reasonable grounds to believe that the mailing expenses claimed by the Candidate in respect of the September 9, 2018 fundraising barbeque are not legitimate fundraising expenses but rather a standard promotional flyer that ought to have been counted against the General Spending Limit. There are two main reasons for this belief. The first is the sheer number of households to whom the flyer was sent, i.e. virtually every household in Ward 22. This was not a targeted mailer designed to elicit donations from likely donors but rather a promotional flyer sent to all voters. Second, the description of the flyer in the Geko invoice of August 31 strongly supports this concern. The document is described as a ““On October 22, Vote” Fundraising Form”. While the applicant has not reviewed the underlying form that description suggests that the primary purpose of the flyer was to encourage voters to vote for the Candidate rather than to solicit donations.

²⁶ 2016 Census Print-out, Applicant’s Submissions Brief Tab 8.

²⁷ 2018 Candidates’ Guide at p. 24, Applicant’s Authorities Tab 5.

B. Post-Voting Day “Fundraising Event”

40. According to the audited financial statement, the Candidate held a fundraising function on December 21, 2018, i.e. two months after voting day. According to Schedule 2, this event raised zero dollars. The expenses for the event were over \$27,083.50. The event was held at a point in time when the Candidate’s campaign was flush with cash (to the point that it was in the course of paying out \$81,000 in honoraria).

41. There are reasonable grounds to believe that this event, which raised no money at all, was not a fundraising event at all, but was rather a voter appreciation event. Under s. 88.20(8), there is an exemption from the General Spending Limit for “[t]he cost of holding parties and making other expressions of appreciation after the close of voting”. These activities are instead subject to the Voter Appreciation Spending Limit prescribed under s. 88.19(4)(b), which in the case of the Candidate was \$6,120.80. In the circumstances, there are reasonable grounds to believe that the Candidate misclassified this event as a fundraising event in order to circumvent the Voter Appreciation Spending Limit.

PART IV - CONCLUSION

42. The applicant has serious concerns that the Candidate has engaged in serious and repeated breaches that go to the heart of the regulation of election finance under the Act. While the audited financial statement reports that the Candidate underspent the General Spending Limit, that does not account for the \$81,000 honoraria or the \$13,613.36 promotional flyer expenses. When subject to proper accounting, it appears that the Candidate exceeded the General Spending Limit by almost \$80,000 (twice the General Spending Limit). It further appears that he exceeded the Voter Appreciation Spending Limit by over \$20,000.

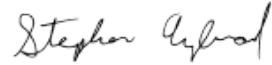
This would mean that the Candidate exceeded the Combined Spending Limit by almost \$100,000, as follows:

A. General Spending Limit	\$61,207.85
B. Voter Appreciation Spending Limit	\$6,210.80
C. Combined Spending Limit (A+B)	\$67,418.65
D. Reported General Expenses	\$43,812.55
E. Reported Voter Appreciation Expenses	\$0
F. Add back honoraria	\$81,000
G. Add back August 27-31 mailing expenses	\$13,611.36
H. Add back Dec 21 voter appreciation event	\$27,083.50
I. Total expenses subject to Combined Spending Limit (D+E+F+G+H)	\$165,507.41
<hr/>	
Excess over Combined Spending Limit (I-C)	\$98,088.76

43. The Candidate raised an impressive amount of over \$217,000 for his campaign. Those donations were made by individuals with the expectation that the City of Toronto would provide a substantial rebate for their contributions. Any surplus held by the campaign at the end of the campaign period was to be paid to the City. This constituted the Candidate as a trustee of public funds. There are serious grounds for concern that the payment of honoraria to supporters amounts to a misappropriation of public funds for private gain. It provided the Candidate with a major financial advantage over other candidates.

44. In the circumstances, an audit of the Candidate's campaign finances in respect of the 2018 election is warranted.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 4th day of June, 2019.



Stephen Aylward

STOCKWOODS LLP

Barristers

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Toronto ON M5K 1H1

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Lawyers for the Applicant

**SCHEDULE “A”
LIST OF AUTHORITIES**

1. *Lancaster v. St. Catharines (City)* 2013 ONSC 7631
2. *Lyras v. Heap*, 2008 ONCJ 524
3. *Gunn v. Halton District School Board*, 2012 ONCJ 684
4. *Kett v. The Corporation of the Township of Scugog*, 2019 ONSC 942
5. 2018 Candidates’ Guide for Ontario municipal council and school board elections (excerpts)
6. “incur” *Black’s Law Dictionary*, 9th Ed
7. *Vladicka v. Calgary Board of Education* (1974), 1974 CarswellAlta 54 (Alta. S.C.)
8. City of Toronto By-Law 1085-17 (Contribution Rebate By-Law)

**SCHEDULE “B”
TEXT OF STATUTES, REGULATIONS & BY-LAWS**

Municipal Elections Act, 1996

S.O. 1996, CHAPTER 32
SCHEDULE

**What constitutes an expense
For an election campaign**

88.19 (1) For the purposes of this Act, costs incurred for goods or services by or under the direction of a person wholly or partly for use in his or her election campaign are expenses. 2016, c. 15, s. 57 (1).

For third party advertisements

(2) For the purposes of this Act, costs incurred by or under the direction of an individual, corporation or trade union for goods or services for use wholly or partly in relation to third party advertisements that appear during an election in a municipality are expenses. 2016, c. 15, s. 57 (2).

Expenses

(3) Without restricting the generality of subsections (1) and (2), the following amounts are expenses:

1. The replacement value of goods retained by the person, individual, corporation or trade union from any previous election in the municipality and used in the current election.
2. The value of contributions of goods and services.
3. Audit and accounting fees.
4. Interest on loans under section 88.17.
5. The cost of holding fund-raising functions.
6. The cost of holding parties and making other expressions of appreciation after the close of voting.
7. For a candidate, expenses relating to a recount or a proceeding under section 83 (controverted elections).
8. Expenses relating to a compliance audit.
9. Expenses that are incurred by a candidate with a disability or a registered third party who is an individual with a disability, are directly related to the disability, and would not have been incurred but for the election to which the expenses relate.

10. The cost of election campaign advertisements (within the meaning of section 88.3) or third party advertisements, as the case may be. 2016, c. 15, s. 57 (3).

Exception

- (4) For greater certainty, the cost of holding fund-raising functions does not include costs related to,
 - (a) events or activities that are organized for such purposes as promoting public awareness of a candidate and at which the soliciting of contributions is incidental; or
 - (b) promotional materials in which the soliciting of contributions is incidental. 2016, c. 15, s. 57 (3).

Transition, candidates' expenses

- (5) In the following circumstances, a candidate's expenses for the 2018 regular election that are described in paragraphs 7 and 8 of subsection (3) may include his or her expenses as a candidate in the 2014 regular election for an office on the same council or local board:

1. The circumstances described in paragraph 4 of subsection 88.24 (1) (deficit).
2. The circumstances described in paragraph 5 of subsection 88.24 (1) (expenses relating to a recount, etc.). 2016, c. 15, s. 57 (3).

Candidates' expenses

88.20 (1) An expense shall not be incurred by or under the direction of a person unless he or she is a candidate. 2016, c. 15, s. 58.

Only during campaign period

- (2) An expense shall not be incurred by or under the direction of a candidate outside his or her election campaign period. 2016, c. 15, s. 58.

Exception, auditor's report

- (3) Despite subsection (2), a candidate whose election campaign period ends as described in paragraph 2, 3 or 4 of subsection 88.24 (1) may incur expenses related to the preparation of an auditor's report under section 88.25 after the campaign period has ended. 2016, c. 15, s. 58.

Same

- (4) For greater certainty, the expenses described in subsection (3) constitute expenses for the purposes of paragraph 3 of subsection 88.19 (3). 2016, c. 15, s. 58.

Who may incur expense

(5) An expense may only be incurred by a candidate or an individual acting under the candidate's direction. 2016, c. 15, s. 58.

Maximum amount

(6) During the period that begins on the day a candidate is nominated under section 33 and ends on voting day, his or her expenses shall not exceed an amount calculated in accordance with the prescribed formula. 2016, c. 15, s. 58.

Prescribed formula

(7) The formula prescribed for the purpose of subsection (6) must be written so that the amount calculated under it varies based on the number of electors entitled to vote for the office for which the candidate is nominated. 2016, c. 15, s. 58.

Exception

(8) Subsection (6) does not apply in respect of expenses described in paragraphs 3 and 5 to 9 of subsection 88.19 (3). 2016, c. 15, s. 58.

Maximum amount for parties, etc., after voting day

(9) The expenses of a candidate that are described in paragraph 6 of subsection 88.19 (3) shall not exceed an amount calculated in accordance with the prescribed formula. 2016, c. 15, s. 58.

Same

(10) The formula that is prescribed for the purposes of subsection (9) must be written so that the amount calculated under it varies based on the maximum amount determined under subsection (6) for the office for which the candidate is nominated. 2016, c. 15, s. 58.

Number of electors, regular election

(11) For the purposes of subsection (7), for a regular election the number of electors is the greater of the following:

1. The number determined from the voters' list from the previous regular election, as it existed on September 15 in the year of the previous election, adjusted for changes made under sections 24 and 25 that were approved as of that day.
2. The number determined from the voters' list for the current election, as it exists on September 15 in the year of the current election, adjusted for changes made under sections 24 and 25 that are approved as of that day. 2016, c. 15, s. 58.

Same, by-election

(12) For the purposes of subsection (7), for a by-election the number of electors is the greater of the following:

1. The number determined from the voters' list from the previous regular election, as it existed on September 15 in the year of the previous election, adjusted for changes made under sections 24 and 25 that were approved as of that day.
2. The number determined from the voters' list for the by-election, as it exists after the clerk has made corrections under subparagraph 4 iii of subsection 65 (4). 2016, c. 15, s. 58.

Certificate of maximum amounts

(13) The clerk shall calculate the maximum amounts permitted by subsections (6) and (9) for each office for which nominations were filed with him or her and give a certificate of the applicable maximum amounts to each candidate,

- (a) in the case of a regular election, on or before September 25; and
- (b) in the case of a by-election, within 10 days after the clerk makes the corrections under subparagraph 4 iii of subsection 65 (4). 2016, c. 15, s. 58.

Calculations final

(14) The clerk's calculations are final. 2016, c. 15, s. 58.

Transition

(15) For the 2018 regular election and for any by-election that takes place after this section comes into force and before that regular election, the maximum amount determined under subsection (6) shall be determined as if paragraph 1 of subsection (11) read as follows:

1. The number determined from the voters' list from the previous election, as it existed on nomination day of the previous election, adjusted for applications under sections 24 and 25 that were approved as of that day. 2016, c. 15, s. 58.

Duties of candidates

88.22 (1) A candidate shall ensure that,

- (a) no contributions of money are accepted or expenses are incurred unless one or more campaign accounts are first opened at a financial institution exclusively for the purposes of the election campaign;
- (b) all contributions of money are deposited into the campaign accounts;
- (c) all funds in the campaign accounts are used exclusively for the purposes of the election campaign;
- (d) all payments for expenses are made from the campaign accounts;
- (e) contributions of goods or services are valued;
- (f) receipts are issued for every contribution and obtained for every expense;
- (g) records are kept of,
 - (i) the receipts issued for every contribution,
 - (ii) the value of every contribution,
 - (iii) whether a contribution is in the form of money, goods or services, and
 - (iv) the contributor's name and address;
- (h) records are kept of every expense including the receipts obtained for each expense;
- (i) records are kept of any claim for payment of an expense that the candidate disputes or refuses to pay;
- (j) records are kept of the gross income from a fund-raising function and the gross amount of money received at a fund-raising function by donations of \$25 or less or by the sale of goods or services for \$25 or less;
- (k) records are kept of any loan and its terms under section 88.17;
- (l) the records described in clauses (g), (h), (i), (j) and (k) are retained by the candidate for the term of office of the members of the council or local board and until their successors are elected and the newly elected council or local board is organized;
- (m) financial filings are made in accordance with sections 88.25 and 88.32;
- (n) proper direction is given to the persons who are authorized to incur expenses and accept or solicit contributions under the direction of the candidate;
- (o) a contribution of money made or received in contravention of this Act or a by-law passed under this Act is returned to the contributor as soon as possible after the candidate becomes aware of the contravention;
- (p) a contribution not returned to the contributor under clause (o) is paid to the clerk with whom the candidate's nomination was filed;
- (q) an anonymous contribution is paid to the clerk with whom the candidate's nomination was filed; and

- (r) each contributor is informed that a contributor shall not make contributions exceeding,
 - (i) subject to subsection (2), a total of \$1,200 to any one candidate in an election, and
 - (ii) a total of \$5,000 to two or more candidates for offices on the same council or local board. 2016, c. 15, s. 60; 2017, c. 10, Sched. 4, s. 8 (13).

Candidate for mayor, City of Toronto

(2) A candidate for the office of mayor of the City of Toronto shall ensure that each of his or her contributors is informed that a contributor shall not make contributions exceeding a total of \$2,500 to any one candidate for the office of mayor of the City of Toronto. 2016, c. 15, s. 60.

Exclusion of certain expenses

(3) Expenses described in paragraph 2 of subsection 88.19 (3) are not expenses for the purpose of clause (1) (a). 2016, c. 15, s. 60.

Contributions paid to clerk

(4) Contributions paid to the clerk under clause (1) (p) or (q) become the property of the local municipality. 2016, c. 15, s. 60.

Election campaign period for candidates

88.24 (1) For the purposes of this Act, a candidate's election campaign period for an office shall be determined in accordance with the following rules:

1. The election campaign period begins on the day on which he or she files a nomination for the office under section 33.
2. The election campaign period ends on December 31 in the case of a regular election and 45 days after voting day in the case of a by-election.
3. Despite paragraph 2, the election campaign period ends,
 - i. on the day the nomination is withdrawn under section 36 or is deemed to be withdrawn under subsection 29 (2),
 - ii. on nomination day, if the nomination is rejected under section 35, or
 - iii. on the day the candidate files the documents under section 88.25, as long as the documents are filed after voting day and before December 31 in the year of a regular election.

4. Despite paragraphs 2 and 3, if the candidate has a deficit at the time the election campaign period would otherwise end and the candidate notifies the clerk in the prescribed form on or before December 31 in the case of a regular election and 45 days after voting day in the case of a by-election, the election campaign period is extended and is deemed to have run continuously from the date of nomination until the earliest of,

- i. June 30 in the year following the regular election,
- ii. the end of the six-month period following the 45th day after voting day, in the case of a by-election,
- iii. the day he or she is nominated in a subsequent election for an office on the council or local board in respect of which the deficit was incurred,
- iv. the day the candidate notifies the clerk in writing that he or she will not accept further contributions, and
- v. the day A equals the total of B and C , where,

A = any further contributions,

B = the expenses incurred during the extension of the election campaign period, and

C = the amount of the candidate's deficit at the start of the extension of the election campaign period.

5. If, after the election campaign period ends under paragraph 2, 3 or 4, the candidate incurs expenses relating to a recount, a proceeding under section 83 (controversed elections) or a compliance audit and the candidate notifies the clerk in writing, the election campaign period is deemed to have recommenced, subject to subsection (2), and to have run continuously from the date of nomination until the earliest of,

- i. the day the total of A and B equals the total of C and D , where,

A = any amount released to the candidate under subsection 88.31 (7),

B = any further contributions,

C = the expenses incurred after the election campaign period recommences, and

D = the amount of the candidate's deficit, if any, before the election campaign period recommenced,

- ii. the day he or she is nominated in a subsequent election for an office on the council or local board in respect of which the expenses referred to in subparagraph i were incurred,
- iii. the day the candidate notifies the clerk in writing that the candidate will not accept further contributions,
- iv. June 30 in the year following the regular election, and
- v. the end of the six-month period following the 45th day after voting day, in the case of a by-election. 2016, c. 15, s. 60; 2017, c. 10, Sched. 4, s. 8 (14, 15)

Same

- (2) An election campaign period that has ended under subparagraph 4 ii or 5 ii of subsection (1) cannot recommence under paragraph 5. 2016, c. 15, s. 60.

Multiple and combined campaigns

- (3) The following rules apply if a person is a candidate, at different times in the same election, for more than one office on the same council or local board:

- 1. The person's campaigns for offices for which the election is conducted by general vote shall be deemed to be one campaign for the last office for which he or she is nominated, but the election campaign period begins on the day of the first nomination.
- 2. Each campaign for an office for which the election is conducted by ward is a separate campaign. 2016, c. 15, s. 60.

Candidates' financial statements, etc.

88.25 (1) On or before 2 p.m. on the filing date, a candidate shall file with the clerk with whom the nomination was filed a financial statement and auditor's report, each in the prescribed form, reflecting the candidate's election campaign finances,

- (a) in the case of a regular election, as of December 31 in the year of the election; and
- (b) in the case of a by-election, as of the 45th day after voting day. 2016, c. 15, s. 60.

Same

- (2) If a candidate's election campaign period ends as described in paragraph 3 of subsection 88.24 (1), the financial statement and auditor's report must reflect the candidate's election campaign finances as of the day the election campaign period ended. 2016, c. 15, s. 60.

Error in financial statement

(3) If an error is identified in a filed financial statement, the candidate may withdraw the statement and, at the same time, file a corrected financial statement and auditor's report on or before the applicable filing date under section 88.30. 2016, c. 15, s. 60.

Supplementary financial statement and auditor's report

(4) If the candidate's election campaign period continues during all or part of the supplementary reporting period, the candidate shall, before 2 p.m. on the supplementary filing date, file a supplementary financial statement and auditor's report for the supplementary reporting period. 2016, c. 15, s. 60.

Same

(5) If a candidate's election campaign period ends as described in paragraph 3 of subsection 88.24 (1) and the election campaign period continued during all or part of the supplementary reporting period, the candidate shall, before 2 p.m. on the supplementary filing date, file a supplementary financial statement and auditor's report for the period commencing on the day the candidate's election campaign period ends and including the six-month period following the year of the election. 2016, c. 15, s. 60.

Supplementary report

(6) A supplementary financial statement or auditor's report shall include all the information contained in the initial statement or report filed under subsection (1), updated to reflect the changes to the candidate's campaign finances during the supplementary reporting period. 2016, c. 15, s. 60.

Auditor

(7) An auditor's report shall be prepared by an auditor licensed under the *Public Accounting Act, 2004*. 2016, c. 15, s. 60.

Exception re auditor's report

(8) No auditor's report is required if the total contributions received and total expenses incurred in the election campaign up to the end of the relevant period are each equal to or less than \$10,000. 2016, c. 15, s. 60.

Notice to candidates, before filing date

(9) At least 30 days before the filing date, the clerk shall give notice of the following matters to every candidate whose nomination was filed with him or her:

1. All the filing requirements of this section.
2. The candidate's entitlement to receive a refund of the nomination filing fee if he or she meets the requirements of section 34.
3. The penalties set out in subsections 88.23 (2) and 92 (1). 2016, c. 15, s. 60.

Same, before supplementary filing date

(10) At least 30 days before the supplementary filing date, the clerk shall give notice of the filing requirements of this section and the penalties set out in subsections 88.23 (2) and 92 (1) to the following candidates:

1. A candidate who notified the clerk under paragraph 4 of subsection 88.24 (1).
2. A candidate who notified the clerk under paragraph 5 of subsection 88.24 (1). 2016, c. 15, s. 60.

Electronic filing

(11) The clerk may provide for electronic filing under this section and may establish conditions and limits with respect to electronic filing. 2016, c. 15, s. 60.

Documents filed after filing date

(12) If the documents required to be filed under this section are not filed by 2 p.m. on the day that is 30 days after the applicable day for filing the documents, the clerk shall accept the documents only for the purpose of making the documents available under subsection 88 (9.1). 2016, c. 15, s. 60.

Return of surplus for subsequent expenses

88.32 (1) This section applies if all of the following circumstances exist:

1. A candidate or registered third party has paid a surplus to the clerk under subsection 88.31 (4).
2. The candidate's election campaign period has ended under paragraph 2, 3 or 4 of subsection 88.24 (1) or the registered third party's campaign period has ended under paragraph 2 or 3 of section 88.28.
3. It is no longer possible to recommence the campaign period under paragraph 5 of subsection 88.24 (1) or paragraph 4 of section 88.28.
4. The candidate or registered third party subsequently incurs expenses relating to a compliance audit. 2016, c. 15, s. 62.

Return of surplus

(2) If the candidate or registered third party notifies the clerk in writing that he, she or it is incurring subsequent expenses relating to a compliance audit, the clerk shall return the amount of the surplus, with interest, to the candidate or registered third party. 2016, c. 15, s. 62.

Effect of return of surplus

(3) If the surplus is returned to the candidate or registered third party, he, she or it is permitted to incur expenses relating to a compliance audit but no other expenses may be incurred. 2016, c. 15, s. 62.

Reporting periods

(4) The first reporting period of the candidate or registered third party under this section begins on the day after the surplus is returned and ends 90 days later, and each successive period of 90 days is a further reporting period. 2016, c. 15, s. 62.

Financial statements

(5) For each reporting period, the candidate or registered third party shall file with the clerk a financial statement in the prescribed form reflecting the expenses of the candidate or registered third party for the reporting period, and the financial statement must be filed no later than 2 p.m. on the 10th day after the end of the reporting period. 2016, c. 15, s. 62.

Final financial statement

(6) If, during a reporting period, the amount of surplus is reduced to zero or any remaining surplus is no longer required by the candidate or registered third party for expenses relating to a compliance audit, the candidate or registered third party shall file a final financial statement. 2016, c. 15, s. 62.

Repayment of remaining surplus

(7) If the final financial statement indicates that there is any remaining surplus, the candidate or registered third party shall pay the remaining surplus to the clerk when the financial statement is filed. 2016, c. 15, s. 62.

Remaining surplus held in trust by clerk

(8) The clerk shall hold the amount of the remaining surplus in trust for the candidate or registered third party. 2016, c. 15, s. 62.

Release of amount if another compliance audit

(9) If, after the candidate or registered third party pays the remaining surplus to the clerk, another compliance audit commences, subsections (2) to (8) apply, with necessary modifications, with respect to the subsequent compliance audit. 2016, c. 15, s. 62.

Amount to become property of municipality or local board

(10) The amount of the remaining surplus becomes the property of the municipality or the local board, as the case may be, when the compliance audit is finally determined and the period for commencing any other compliance audit has expired. 2016, c. 15, s. 62.

COMPLIANCE AUDITS AND REVIEWS OF CONTRIBUTIONS

Compliance audit of candidates' campaign finances

Application by elector

88.33 (1) An elector who is entitled to vote in an election and believes on reasonable grounds that a candidate has contravened a provision of this Act relating to election campaign finances may apply for a compliance audit of the candidate's election campaign finances, even if the candidate has not filed a financial statement under section 88.25. 2016, c. 15, s. 63.

Requirements

(2) An application for a compliance audit shall be made to the clerk of the municipality or the secretary of the local board for which the candidate was nominated for office, and it shall be in writing and shall set out the reasons for the elector's belief. 2016, c. 15, s. 63.

Deadline for applications

(3) The application must be made within 90 days after the latest of the following dates:

1. The filing date under section 88.30.
2. The date the candidate filed a financial statement, if the statement was filed within 30 days after the applicable filing date under section 88.30.
3. The candidate's supplementary filing date, if any, under section 88.30.
4. The date on which the candidate's extension, if any, under subsection 88.23 (6) expires. 2016, c. 15, s. 63.

Compliance audit committee

(4) Within 10 days after receiving the application, the clerk of the municipality or the secretary of the local board, as the case may be, shall forward the application to the compliance audit committee. 2016, c. 15, s. 63.

Notice of meetings

(5) Reasonable notice of the meetings of the committee under this section shall be given to the candidate, the applicant and the public. 2017, c. 20, Sched. 10, s. 1.

Open meetings

(5.1) The meetings of the committee under this section shall be open to the public, but the committee may deliberate in private. 2017, c. 20, Sched. 10, s. 1.

Same

(6) Subsection (5.1) applies despite sections 207 and 208.1 of the *Education Act*. 2017, c. 20, Sched. 10, s. 1.

Decision of committee

(7) Within 30 days after the committee has received the application, the committee shall consider the application and decide whether it should be granted or rejected. 2016, c. 15, s. 63.

Same

(8) The decision of the committee to grant or reject the application, and brief written reasons for the decision, shall be given to the candidate, the clerk with whom the candidate filed his or her nomination, the secretary of the local board, if applicable, and the applicant. 2016, c. 15, s. 63.

Appeal

(9) The decision of the committee under subsection (7) may be appealed to the Superior Court of Justice within 15 days after the decision is made, and the court may make any decision the committee could have made. 2016, c. 15, s. 63.

Appointment of auditor

(10) If the committee decides under subsection (7) to grant the application, it shall appoint an auditor to conduct a compliance audit of the candidate's election campaign finances. 2016, c. 15, s. 63.

Same

(11) Only auditors licensed under the *Public Accounting Act, 2004* or prescribed persons are eligible to be appointed under subsection (10). 2016, c. 15, s. 63.

Duty of auditor

(12) The auditor shall promptly conduct an audit of the candidate's election campaign finances to determine whether he or she has complied with the provisions of this Act relating to election campaign finances and shall prepare a report outlining any apparent contravention by the candidate. 2016, c. 15, s. 63.

Who receives report

(13) The auditor shall submit the report to the candidate, the clerk with whom the candidate filed his or her nomination, the secretary of the local board, if applicable, and the applicant. 2016, c. 15, s. 63.

Report to be forwarded to committee

(14) Within 10 days after receiving the report, the clerk of the municipality or the secretary of the local board shall forward the report to the compliance audit committee. 2016, c. 15, s. 63.

Powers of auditor

- (15) For the purpose of the audit, the auditor,
- (a) is entitled to have access, at all reasonable hours, to all relevant books, papers, documents or things of the candidate and of the municipality or local board; and
 - (b) has the powers set out in section 33 of the *Public Inquiries Act, 2009* and section 33 applies to the audit. 2016, c. 15, s. 63.

Costs

(16) The municipality or local board shall pay the auditor's costs of performing the audit. 2016, c. 15, s. 63.

Decision

(17) The committee shall consider the report within 30 days after receiving it and, if the report concludes that the candidate appears to have contravened a provision of the Act relating to election campaign finances, the committee shall decide whether to commence a legal proceeding against the candidate for the apparent contravention. 2016, c. 15, s. 63.

Notice of decision, reasons

(18) The decision of the committee under subsection (17), and brief written reasons for the decision, shall be given to the candidate, the clerk with whom the candidate filed his or her nomination, the secretary of the local board, if applicable, and the applicant. 2016, c. 15, s. 63.

Immunity

(19) No action or other proceeding for damages shall be instituted against an auditor appointed under subsection (10) for any act done in good faith in the execution or intended execution of the audit or for any alleged neglect or default in its execution in good faith. 2016, c. 15, s. 63.

Saving provision

(20) This section does not prevent a person from laying a charge or taking any other legal action, at any time, with respect to an alleged contravention of a provision of this Act relating to election campaign finances. 2016, c. 15, s. 63.

Tab 1

Financial Statement - Auditor's Report Candidate - Form 4

Municipal Elections Act, 1996 (Section 88.25)

Instructions

All candidates must complete Boxes A and B. Candidates who receive contributions or incur expenses must complete Boxes C, D, Schedule 1 and Schedule 2 as appropriate. Candidates who receive contributions or incur expenses in excess of \$10,000 must also attach an Auditor's Report.

All surplus funds (after any refund to the candidate or their spouse) shall be paid immediately over to the clerk who is responsible for the conduct of the election.

For the campaign period from (day candidate filed nomination)

YYYY	MM	DD
2	0	1

YYYY	MM	DD
2	0	1

 to

YYYY	MM	DD
2	0	1

YYYY	MM	DD
2	0	1

☒ Initial filing reflecting finances to December 31 (or 45 days after voting day in a by-election)

☐ Supplementary filing including finances after December 31 (or 45 days after voting day in a by-election)

Box A: Name of Candidate and Office

Candidate's name as shown on the ballot

Last Name or Single Name

KARYGIANNIS

Given Name(s)

JIM

Office for which the candidate sought election

COUNCILLOR

Ward name or no. (if any)

WARD 22

Municipality

MUNICIPALITY OF TORONTO

Spending Limit - General

\$ 61,207.95

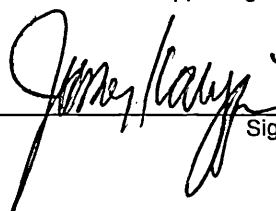
Spending Limit - Parties and Other Expressions of Appreciation

\$ 6,120.80

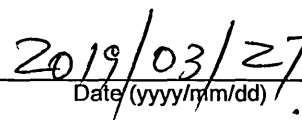
☐ I did not accept any contributions or incur any expenses. (Complete Boxes A and B only)

Box B: Declaration

I, JIM KARYGIANNIS, declare that to the best of my knowledge and belief that these financial statements and attached supporting schedules are true and correct.



Signature of Candidate



Date (yyyy/mm/dd)

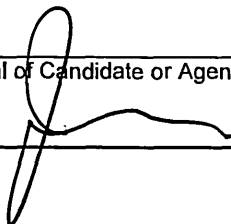
Date Filed (yyyy/mm/dd)

2019-03-27

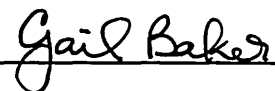
Time Filed

12:34 PM

Initial of Candidate or Agent (if filed in person)



Signature of Clerk or Designate



Box C: Statement of Campaign Income and Expenses**LOAN**Name of bank or recognized lending institution SCOTIA BANK

Amount borrowed

\$ **INCOME**

Total amount of all contributions (from line 1A in Schedule 1)	+ \$	217,669.44
Revenue from items \$25 or less	+ \$	
Sign deposit refund	+ \$	
Revenue from fundraising events not deemed a contribution (from Part III of Schedule 2)	+ \$	
Interest earned by campaign bank account	+ \$	
Other (provide full details)		
1.	+ \$	
2.	+ \$	
3.	+ \$	
4.	+ \$	
5.	+ \$	
Total Campaign Income (Do not include loan)	= \$	217,669.44 c1

EXPENSES (Note: include the value of contributions of goods and services)**Expenses subject to general spending limit**

Inventory from previous campaign used in this campaign (list details in Table 4 of Schedule 1)	+ \$	
Advertising	+ \$	
Brochures/flyers	+ \$	12,550.85
Signs (including sign deposit)	+ \$	5,650.00
Meetings hosted	+ \$	
Office expenses incurred until voting day	+ \$	9,865.23
Phone and/or internet expenses incurred until voting day	+ \$	1,027.22
Salaries, benefits, honoraria, professional fees incurred until voting day	+ \$	
Bank charges incurred until voting day	+ \$	3,545.84
Interest charged on loan until voting day	+ \$	
Other (provide full details)		
1. SIGNS FROM PREVIOUS CAMPAIGN	+ \$	6,349.44
2. POLLING	+ \$	4,823.97
3.	+ \$	
4.	+ \$	
5.	+ \$	
Total Expenses subject to general spending limit	= \$	43,812.55 c2

EXPENSES**Expenses subject to spending limit for parties and other expressions of appreciation**

1.	+ \$	
2.	+ \$	
3.	+ \$	
4.	+ \$	
5.	+ \$	
Total Expenses subject to spending limit for parties and other expressions of appreciation	= \$	C3

Expenses not subject to spending limits

Accounting and audit	+ \$	7,345.00
Cost of fundraising events/activities (list details in Part IV of Schedule 2)	+ \$	47,259.86
Office expenses incurred after voting day	+ \$	3,858.27
Phone and/or internet expenses incurred after voting day	+ \$	410.20
Salaries, benefits, honoraria, professional fees incurred after voting day	+ \$	81,000.00
Bank charges incurred after voting day	+ \$	1,772.34
Interest charged on loan after voting day	+ \$	
Expenses related to recount	+ \$	
Expenses related to controverted election	+ \$	
Expenses related to compliance audit	+ \$	
Expenses related to candidate's disability (provide full details)		
1. _____	+ \$	
2. _____	+ \$	
3. _____	+ \$	
4. _____	+ \$	
5. _____	+ \$	
Other (provide full details)		
1. VICTORY PARTY AFTER VOTING DAY	+ \$	5,000.00
2. _____	+ \$	
3. _____	+ \$	
4. _____	+ \$	
5. _____	+ \$	
Total Expenses not subject to spending limits	= \$	146,645.67 C4

Total Campaign Expenses (C2 + C3 + C4) = \$ **190,458.22 C5**

Box D: Calculation of Surplus or Deficit

Excess (deficiency) of income over expenses (Income minus Total Expenses) (C1 – C5)	+ \$	27,211.22 D1
Eligible deficit carried forward by the candidate from the last election (applies to 2018 regular election only)	– \$	D2
Total (D1 – D2)	= \$	27,211.22
If there is a surplus, deduct any refund of candidate's or spouse's contributions to the campaign	– \$	
Surplus (or deficit) for the campaign	= \$	27,211.22 D3

If line D3 shows a surplus, the amount must be paid in trust, at the time the financial statements are filed, to the municipal clerk who is responsible for the conduct of the election.

Part I – Summary of Contributions

+ \$

+ \$ 6,349.44

+ \$ 2,320.00

- + \$ 209,000.00

- \$

- \$

= \$ 217,669.44 1A

= \$ 217,669.44 1A

= \$ 217,669.44 1A

Table 1: Monetary contributions from individuals other than candidate or spouse

☒ Additional information is listed on separate supplementary attachment.

Total

209,000.00

Jim Karygiannis Part II - Table 1 Detailed Listing

Number	Contributor last name	Contributor first Name	Street Number	Street Name	Suite	City	Province	Postal Code	Amount exceeding \$100	Amount \$100 or less
306	Fazekas	Anthony	31	Marsha Dr.		Toronto	ON	M1T 2S3		25.00
310	Shirlow	Robert J	37	New Forest Sq		Scarborough	ON	M1V 2Z6		25.00
352	Wong	Catherine	4173	Vermont Cres		Burlington	ON	L7M 4A9		25.00
357	Law	Alwick	22	Murison Dr.		Markham	ON	L6C 0J2		30.00
178	Soni	Tom	38	Staley Terrace		Toronto	ON	M1W 2E7		40.00
191	Molinari	Joseph	44	Belgreen Ave		Toronto	ON	M1S 1G4		50.00
204	Callaghan	Dave	117	Gerrard St E	Unit1106	Toronto	ON	M5B 2L4		50.00
303	Rotman	Carl	650	EglintonAve W	Unit702	Toronto	ON	M5N 1C2		50.00
312	Trenton	Michael	69	Malamute Cres		Scarborough	ON	M1T 2C9		50.00
328	Lefebvre	Lynn P	3	Kimbermount Dr		Scarborough	ON	M1T 2Y1		50.00
330	Selvaratnam	Sinniah	40	Wayside Ave	Unit9	Scarborough	ON	M1V 1N3		50.00
332	Huynh	Nu-To	11	Amulet St		Scarborough	ON	M1T 2E3		50.00
346	Boujikian	Anna	78	Davisbrook Blvd		Scarborough	ON	M1T 2J2		50.00
354	Ho	Shek Hung Christopher	7	Norman Ave		Nobleton	ON	L0G 1N0		50.00
358	Wong	David	4173	Vermont Cres		Burlington	ON	L7M 4A9		50.00
359	Kwan	Tim	4044	Sheppard Ave E		Toronto	ON	M1S 1S6		50.00
379	Selvaratnam	Sinniah	40	WaysideAve	Unit9	Scarborough	ON	M1V 1N3		50.00
304	Cheong	Denis R	60	Holbush Cres		Scarborough	ON	M1V 2Y9		75.00
44	Terzian	Vazken	68	Alexis Rd		Thomhill	ON	L3T 7A3		100.00
176	Chan	Chor Piu	525	Muirfield St		Oshawa	ON	L1H 8E3		100.00
177	Battiston	Lamberto	18	Springhouse Sq		Scarborough	ON	M1W 2X1		100.00
179	Wang	Ming-Ming	2350	Bridletowne Cir	Unit1007	Scarborough	ON	M1W 3E6		100.00
185	Oprea	George	2330	Bridletowne Cir	Unit1801	Toronto	ON	M1W 3P6		100.00
193	Xiao	Qin	50	EagleviewCres		Toronto	ON	M1W 3N2		100.00
197	Oprea	Sorina	2330	Bridletowne Cir	Unit1801	Toronto	ON	M1W 3P6		100.00
290	Bargenda	Ursula	2550	Pharmacy Ave	Unit1615	Scarborough	ON	M1W 1H9		100.00
307	Wu	Xinwu	5	Orchid Ct		Toronto	ON	M2L 2X8		100.00
308	Master	Hilla M	1881	McNicoll Ave	Unit211	Toronto	ON	M1V 5M2		100.00
311	Roberts	Edward G	2	Fawndale Cres		Scarborough	ON	M1W 3K1		100.00
337	Kalsi	Jaswant S	125	Bamburgh Cir	Unit1008	Scarborough	ON	M1W 3G4		100.00
345	Boujikian	Marie	78	Davisbrook Blvd		Scarborough	ON	M1T 2J2		100.00
347	Boujikian	Silva	196	Dupont St		Toronto	ON	M5R 2E6		100.00
356	Chau	Frank	79	Hogarth Ave		Toronto	ON	M4K 1K2		100.00
43	Elenis	Tony	45	Rolling Hills Lane		Bolton	ON	L7E 1T8	200.00	
175	Arora	Chander Kanta	118	Abbeywood Trail		North York	ON	M3B 3B5	200.00	
182	Yu	Li	128	Corinthian Blvd		Scarborough	ON	M1W 1B8	200.00	
183	Rupnarian	Anand	215	Wynford Dr.	Unit2001	North York	ON	M3C 3P5	200.00	
186	Oprea	George	2330	Bridletowne Cir	Unit1801	Toronto	ON	M1W 3P6	200.00	
187	Lee	Sai-Kui	1038	McNicoll Ave	Unit1106	Scarborough	ON	M1W 0A4	200.00	
189	Femigno-Figliomeni	Marisa	53	Hawstone Rd		Woodbridge	ON	L4H 0A1	200.00	
196	Downs	Barry	2	Lockie Ave		Toronto	ON	M1S 1N1	200.00	
199	Kabanda	Teonest	100	Sprucewood Ct	Unit908	Scarborough	ON	M1W 2P2	200.00	
206	Dubey	Anjali	826	Huntingwood Dr.		Scarborough	ON	M1T 2L6	200.00	
294	Behar	Moiz	47	Livingstone Rd		Thomhill	ON	L3T 7B6	200.00	
317	Tang	Ealex	21	Gadani Dr.		Markham	ON	L6E 0R1	200.00	
343	Yang	Sze Tak	3315	Midland Ave		Scarborough	ON	M1V 4W7	200.00	
348	Ip	Joseph Chi-Tak	175	Bamburgh Cir	Unit1215	Scarborough	ON	M1W 3X9	200.00	
355	Lee	Josephine	2	Chedington Pl	Unit3B	Toronto	ON	M4N 3R5	200.00	
363	Dominelli	Fred	251	Maple Leaf Dr		Toronto	ON	M6L 1P1	200.00	
364	Lui	Alice Shu Ling	43	New Forest Sq		Scarborough	ON	M1V 2Z6	200.00	
365	Kwok	Walker	69	Dalmatian Cres		Scarborough	ON	M1C 4W7	200.00	
366	Kwok	Susana	69	Dalmatian Cres		Scarborough	ON	M1C 4W7	200.00	
180	Mirkopoulos	Stilianos	180	John West Way	Unit501	Aurora	ON	L4G 0R3	250.00	
316	Dani	Deepak	125	Bamburgh Cir	Unit2011	Scarborough	ON	M1W 3G4	250.00	
342	Bai	Lili	3315	Midland Ave		Scarborough	ON	M1V 4V7	250.00	
378	Di Donato	Nicola	37	Edgehill Rd		Etobicoke	ON	M9A 4N1	250.00	
54	Sanghara	Gurbax Kaur	132	Dells Cres		Brampton	ON	L7A 2X1	300.00	
55	Atwal	Paminder Singh	80	Legend Lane		Brampton	ON	L6X 5B6	300.00	
56	Kang	Gurpreet Singh	73	Haviland Cir		Brampton	ON	L6R 0T7	300.00	
57	Gautam	Neeraj	1806	Daytona Ave		Windsor	ON	N9B 3W5	300.00	
58	Ghuman	Gurpreet Singh	10	Australia Dr.		Brampton	ON	L6R 3E4	300.00	
59	Makore	Gurmukh Singh	7	Firefly Rd		Brampton	ON	L6X 3C1	300.00	
60	Virk	Kamapreet Kaur	19	Totten Dr.		Brampton	ON	L6R 0P5	300.00	
61	Akhtar	Syed	5225	Terry Fox Way		Mississauga	ON	L5V 1Z4	300.00	
62	Nijjar	Sukhwinder Singh	8	Goswell St.		Brampton	ON	L6P 3G8	300.00	
63	Gill	Jagdeep Singh	134	Bonistel Cres		Brampton	ON	L7A 3H1	300.00	
64	Gill	Kanwaldip	7	Glenbury Dr		Thomhill	ON	L4J 7X5	300.00	
65	Dhillon	Gurinder Singh	19	Totten Dr.		Brampton	ON	L6R 0P5	300.00	
66	Dhillon	Sukhjinder	35	Niceview Dr		Brampton	ON	L6R 0M9	300.00	
67	Virk	Sukhdeu Singh	66	Cedarholme Ave		Caledon	ON	L7C 3T1	300.00	
68	Bindre	Jaspal Singh	35	Niceview Dr.		Brampton	ON	L6R 0M9	300.00	
69	Basion	Surinder Kaur	396	Derrydale Dr.		Mississauga	ON	L5W 0E1	300.00	
70	Basion	Ravinder Singh	396	Derrydale Dr.		Mississauga	ON	L5W 0E1	300.00	
71	Gill	Tarjinder Singh	12	Cairnburg Dr.		Brampton	ON	L6P 1X3	300.00	
72	Bal	Saurabhmeet	5	Citadel Cres		Brampton	ON	L6P 1X9	300.00	
73	Gill	Baltej Singh	5	Citadel Cres		Brampton	ON	L6P 1X9	300.00	

Jim Karygiannis Part II - Table 1 Detailed Listing

Number	Contributor last_name	Contributor first Name	Street Number	Street Name	Suite	City	Province	Postal Code	Amount exceeding \$100	Amount \$100 or less
74	Dhindsa	Parminder	50	Muirlands Cres		Brampton	ON	L6X 4P4	300.00	
75	Sahota	Santokh Singh	5	Rowntree Rd	Unit604	Etobicoke	ON	M9V 5G9	300.00	
76	Shoker	Pawandeep Singh	42	Levendale Crt		Brampton	ON	L6P 3Y1	300.00	
77	Rana	Jaspal Singh	37	Rowland St		Brampton	ON	L7A 1Z9	300.00	
78	Rai	Kuldip Singh	21	Littles Rd		Scarborough	ON	M1B 5B8	300.00	
79	Danake	Sema Singh	8356	Sixth Line		Halton Hills	ON	L7G 4S6	300.00	
80	Jhajj	Baliar Singh	123	Hillcroft Dr		Markham	ON	L3S 1G3	300.00	
81	Kang	Harpal Singh	9	Secretariat Dr.		Etobicoke	ON	M9W 6X1	300.00	
82	Atwal	Kuldip Singh	26	Jack Rabbit Cres		Brampton	ON	L6R 2E3	300.00	
83	Kaur	Jasvinder	7	Angelucci Dr		Brampton	ON	L6P 1G6	300.00	
84	Johal	Jagjit Singh	7	Angelucci Dr		Brampton	ON	L6P 1G6	300.00	
87	Dhillon	Yadwinder	8	Seahorse Ave		Brampton	ON	L6V 4P3	300.00	
88	Mahal	Baljinder Kaur	25	Sorbonne Dr.		Brampton	ON	L6P 1Z3	300.00	
89	Dharmait	Gurpal Singh	86	Sal Cir		Brampton	ON	L6R 1H6	300.00	
90	Chuhan	Jagtar Singh	11494	Chinguacousy Rd		Brampton	ON	L7A 0G7	300.00	
91	Thiar	Amarvir Singh	506	Mcferran Cres		Milton	ON	L9T 8J7	300.00	
92	Barwait	Varinderjit	74	OBlate Cres		Brampton	ON	L6Y 0L4	300.00	
93	Bains	Rajvir Kaur	16	Mountland Rd		Brampton	ON	L6P 1Z9	300.00	
94	Bains	Vinod	16	Mountland Rd		Brampton	ON	L6P 1Z9	300.00	
95	Halon	Harjit	48	Morton Way		Brampton	ON	L6Y 2R7	300.00	
96	Aujla	Ranjit Singh	72	Lena Cres		Cambridge	ON	N1R 8P4	300.00	
97	Gill	Jagtar Singh	16	Lena Cres		Cambridge	ON	N1R 8P4	300.00	
99	Dadra	Jasvir Singh	130	Barnett Cres		Fergus	ON	N1M 3E5	300.00	
100	Kang	Sukhnandan Kaur	9	Secretariat Dr.		Etobicoke	ON	M9W 6X1	300.00	
101	Thandi	Bhupinder Singh	572	Parkview Cres		Cambridge	ON	N3H 4X7	300.00	
102	Gill	Veena	107	Prairie Rose Cir		Brampton	ON	L6R 1R7	300.00	
104	Braich	Gurmial Singh	68	Earlsbridge Blvd		Brampton	ON	L7A 2M7	300.00	
105	Johal	Malwant Singh	7382	Redstone Rd		Mississauga	ON	L4T 2A9	300.00	
106	Somal	Santokh Singh	20	Cairnburg Dr		Brampton	ON	L6P 1X5	300.00	
107	Kandola	Randeep Singh	9	Bissel Dr.		Brampton	ON	L7A 3K1	300.00	
110	Kahlon	Mandeep	33	Customline Dr		Brampton	ON	L7A 3G2	300.00	
111	Khinda	Jaspal Singh	8356	Sixth Line		Halton Hills	ON	L7G 4S6	300.00	
113	Kandola	Tarsem Singh	17	Gabrielle Dr		Brampton	ON	L7A 2A3	300.00	
114	Virk	Baljit Singh	105	Lansbury Dr		Scarborough	ON	M1V 3R9	300.00	
115	Bhullar	Prempreet Singh	12477	Kennedy Rd		Caledon	ON	L7C 3P3	300.00	
116	Sodhi	Yadwinder Singh	12758	Centreville Creek Rd		Caledon	ON	L7C 3A6	300.00	
117	Singh	Mukhtar	7808	Wildfern Dr		Mississauga	ON	L4T 3P9	300.00	
118	Hehar	Amandeep Singh	74	Penbridge Cir		Brampton	ON	L7A 2R1	300.00	
119	Kandola	Gursham Singh	8	Kershaw St.		Brampton	ON	L7A 1P5	300.00	
120	Jugal	Avtar Singh	32	Ponymeadow Way		Brampton	ON	L6X 0M3	300.00	
121	Singh	Charanjit	35	Rooldingwood Dr		Brampton	ON	L6Y 4Z7	300.00	
122	Thind	Parminder Singh	61	John Carrol Dr		Brampton	ON	L6P 4J7	300.00	
123	Randhawa	Satinderpal Singh	32	Willow Park Dr		Brampton	ON	L6R 2N2	300.00	
124	Garcha	Gurwinder Singh	86	Jack Rabbit Cres		Brampton	ON	L6R 2E5	300.00	
125	Sehdev	Seema	61	Larkspur Rd		Brampton	ON	L6R 1W8	300.00	
127	Chatha	Darshan	9	Evergreen Ave		Brampton	ON	L6P 0P8	300.00	
128	Singh	Sukhdev	24	Hudson DrDr		Brampton	ON	L6Y 2N7	300.00	
129	Chatha	Harbans	9	Evergreen Ave		Brampton	ON	L6P 0P8	300.00	
130	Rai	Balbir Singh	41	Fenton Way		Brampton	ON	L6P 0P4	300.00	
131	Sandhu	Tarsem Singh	2	Tortoise Crt		Brampton	ON	L6P 0A1	300.00	
132	Singh	Sukhvinder	108	Upper Humber Dr		Etobicoke	ON	M9W 7B7	300.00	
133	Natt	Major Singh	5	Bowan Ave		Brampton	ON	L6P 0Y1	300.00	
134	Ghuman	Balwinder Kaur	4229	Hazinh Court		Mississauga	ON	L5B 3N6	300.00	
135	Aulakh	Ranjit Singh	22	Oranmore Cres		Brampton	ON	L6X 0J9	300.00	
136	Bahia	Balbir Singh	2366	Silverwood Dr		Mississauga	ON	L5M 5B3	300.00	
137	Brar	Bhagat Singh	16	Yellow Avens Blvd.		Brampton	ON	L6R 0K5	300.00	
138	Chiku	Harpreet Singh	15	McCauley Dr.		Caledon	ON	L7E 0B6	300.00	
139	Singh	Surjit	12	Glenbrook Blvd		Brampton	ON	L6P 0N8	300.00	
140	Singh	Ravinder	54	Mactier Dr.		Vaughan	ON	L4H 4C2	300.00	
141	Dhaliwal	Sikander Singh	32	Redclover Rd		Brampton	ON	L6R 2B5	300.00	
142	Uppal	Bhupinder Singh	13	Bonecho Trail		Brampton	ON	L6R 0S7	300.00	
143	Chamdal	Amrik Lal	13	Bonecho Trail		Brampton	ON	L6R 0S7	300.00	
144	Kharoud	Harpreet Singh	14	Pappain Cres		Brampton	ON	L7A 3J8	300.00	
145	Bajwa	Gurpreet Singh	25	Borneo Cres		Brampton	ON	L6R 3C6	300.00	
146	Badesha	Ravinder Singh	11	Jacob Brill Cres		Brampton	ON	L6Y 5K5	300.00	
147	Singh	Manjit	154	Mount Olive Dr		Etobicoke	ON	M9V 2E5	300.00	
148	Bhokal	Prabhjot Kaur	48	Midsummer Dr		Brampton	ON	L6P 3E5	300.00	
149	Singh	Baljinder	48	Midsummer Dr		Brampton	ON	L6P 3E5	300.00	
150	Padam	Harjinder	11	Alicewood Ct		Etobicoke	ON	M9V 3Y1	300.00	
151	Padam	Jaswinder Singh	11	Alicewood Ct		Etobicoke	ON	M9V 3Y1	300.00	
152	Sidhu	Gurjit	11	National Cres		Brampton	ON	L7A 1H1	300.00	
153	Kaur	Balbir	189	Wincott Dr.		Etobicoke	ON	M9R 2P9	300.00	
154	Dosanjh	Amrit	189	Wincott Dr.		Etobicoke	ON	M9R 2P9	300.00	
155	Dosanjh	Hervina	189	Wincott Dr.		Etobicoke	ON	M9R 2P9	300.00	
156	Dosanjh	Narinder Kaur	88	Avalanche Cres		Brampton	ON	L6T 1L7	300.00	
157	Dosanjh	Kashmir	88	Avalanche Cres		Brampton	ON	L6T 1L7	300.00	

Jim Karygiannis Part II - Table 1 Detailed Listing

Number	Contributor last name	Contributor first Name	Street Number	Street Name	Suite	City	Province	Postal Code	Amount exceeding \$100	Amount \$100 or less
158	Dosanjh	Kewal	189	Wincott Dr.		Etobicoke	ON	M9R 2P9	300.00	
159	Dosanjh	Sukhjot Kaur	189	Wincott Dr.		Etobicoke	ON	M9R 2P9	300.00	
160	Singh	Jamail	6191	Atlantic Dr.		Mississauga	ON	L5T 1N7	300.00	
161	Shoker	Jasvinder Singh	23	Ryckman Lane		Brampton	ON	L6P 0C8	300.00	
162	Sandhu	Kuldip	3740	Wyewood Rd		Mississauga	ON	L4T 2A2	300.00	
163	Singh	Gurshinder	40	Guiness Ave		Etobicoke	ON	M9W 3K9	300.00	
164	Sandhu	Sarbjit	3740	Wyewood Rd		Mississauga	ON	L4T 2A2	300.00	
165	Mahil	Davinder	40	Guiness Ave		Etobicoke	ON	M9W 3K9	300.00	
166	Mahil	Harbir	95	Cabernet Cir		Etobicoke	ON	M9V 5A2	300.00	
167	Arora	Puneet	52	Moldovan Dr		Brampton	ON	L6R 0E4	300.00	
168	Bajwa	Navdeep Singh	41	Eddystone Ave		Toronto	ON	M3N 1H5	300.00	
169	Mander	Kulwinder Singh	25	Fallview Cir		Caledon	ON	L7C 4C2	300.00	
170	Sandhu	Gurmej Singh	24	Hudson Dr		Brampton	ON	L6Y 2N7	300.00	
192	Shiu	Susan & Marco	18	Carl Cres		Scarborough	ON	M1W 3R2	300.00	
194	Chen	Donald	35	Stoneheath Cres		Markham	ON	L6C 2K9	300.00	
202	Cooperman	Michael	34	King High Ave		Toronto	ON	M3H 3A7	300.00	
203	Bishop	Steven	1037	Streambank Dr.		Mississauga	ON	L5H 3W7	300.00	
220	Singh	Swaran	26	Sagebrook Rd		Brampton	ON	L6P 2Y5	300.00	
222	Thethi	Balwinder Kaur	26	Sagebrook Rd		Brampton	ON	L6P 2Y5	300.00	
279	Chung	Michael	55	Bamburgh Cir	Unit1204	Scarborough	ON	M1W 3V4	300.00	
309	Laroia	Pradeep	131	Autumn Glen Cir		Etobicoke	ON	M9W 6B3	300.00	
326	Oconnell	Phyllis	2075	Warden Ave	Unit1	Scarborough	ON	M1T 3R1	300.00	
327	Oconnell	James E	189	Lake Driveway W	Unit408	Ajax	ON	L1S 7J1	300.00	
333	Wang	Amy	312	Hollywood Ave		Willowdale	ON	M2N 3L2	300.00	
334	Wang	Fred	312	Hollywood Ave		Willowdale	ON	M2N 3L2	300.00	
335	Wang	David	312	Hollywood Ave		Willowdale	ON	M2N 3L2	300.00	
336	Wang	Ping Ming-Chu	312	Hollywood Ave		Willowdale	ON	M2N 3L2	300.00	
362	Szeto	Alfred	191	Greyabbey Trail		Scarborough	ON	M1E 1W2	300.00	
371	Koaloussian	Vatche Der	60	Marlene Crt		Woodbridge	ON	L4L 8L3	300.00	
372	Mirkopoulos	Apkar	31	Beverly Glen Blvd		Scarborough	ON	M1W 1V7	300.00	
314	Mandronis	Peter	99	Morbark Dr.		Scarborough	ON	M1V 2M1	350.00	
315	Mandronis	Christine	99	Morbark Dr.		Scarborough	ON	M1V 2M1	350.00	
329	Andreopoulos	Dimitri	7	Collingsbrook Blvd		Toronto	ON	M1W 1L5	350.00	
344	Hui	Sammy Wing Fu	3315	Midland Ave		Scarborough	ON	M1V 4W7	350.00	
126	Singh	Lachhman	8	KiskadeeDr		Etobicoke	ON	M9V 4P4	400.00	
195	Sidiropoulos	Joseph	18	Beverly St	Unit506	Toronto	ON	M5T 3L2	400.00	
198	Koumarelas	Jim	90	Shrewsbury Sq		Toronto	ON	M1T 1L2	400.00	
26	Demarco	Judita	901	Briar HillAve		Toronto	ON	M6B 1M1	500.00	
29	Wang	Shu	100	Radial Dr.		Aurora	ON	L4G 0Z8	500.00	
30	Wang	Wei	183	Olive Ave		North York	ON	M2N 4P3	500.00	
31	Qin	Lei	38	Braeside Sq.		Markham	ON	L3R 0A4	500.00	
32	Tchohlev	Ivan	1	De Boers Dr.	Unit206	Toronto	ON	M3Y 0G6	500.00	
33	Garabedian	Garo	73	Furnival Rd		East York	ON	M4B 1W6	500.00	
38	Ganesan	Suresh	61	Slan Ave		Scarborough	ON	M1E 3B4	500.00	
39	Sugumar	Sofia Abama	662	SheppardAve E	Unit107C	North York	ON	M2K 1B7	500.00	
40	Wang	Shu	17	Dopp Cres		Whitby	ON	L1M 2E4	500.00	
41	Selvaraj	Ganesh	662	Sheppard Ave E	Unit107	North York	ON	M2B 3J5	500.00	
188	Emery	Marc	40	Alexander St	Unit1407	Toronto	ON	M4Y 1B5	500.00	
205	Feng	Xiao Ya	763	Bay St. St	Unit2202	Toronto	ON	M5G 2R3	500.00	
227	Chan	Felix	18	Laideaw St	Unit1033B	Toronto	ON	M6K 1X2	500.00	
228	Chan	Amy S P	10	Waterhouse Way		Richmond Hill	ON	L4C 9H7	500.00	
229	Chan	Patrick K C	10	Waterhouse Way		Richmond Hill	ON	L4C 9H7	500.00	
230	Hung	Felicia	62	Suncrest Blvd	Unit915	Thornhill	ON	L3T 7Y6	500.00	
231	Hung	Adrian	62	Suncrest Blvd	Unit915	Thornhill	ON	L3T 7Y6	500.00	
233	Dai	Muchen	16	Roverdale Crt		Unionville	ON	L3R 7K7	500.00	
234	Gui	Dongdong	183	Olive Ave		North York	ON	M2N 4P3	500.00	
235	Chen	Xi	3	Lejune Rd		Scarborough	ON	M1T 2S6	500.00	
236	Han	Mei	39	Victoria Wood Ave		Markham	ON	L6E 1K2	500.00	
237	Wang	Sujia	92	Brookmill Blvd		Toronto	ON	M1W 2K5	500.00	
238	Chen	Donghai	30	De Jong St		Toronto	ON	M1P 0B9	500.00	
239	Chen	Yibing	30	De Jong St		Toronto	ON	M1P 0B9	500.00	
240	Ding	Wenlong	17	Manor Rd E		Toronto	ON	M4S 1P9	500.00	
241	Li	Jingming	17	Manor Rd E		Toronto	ON	M4S 1P9	500.00	
242	Yu	Jing	6	Murmouth Rd		Toronto	ON	M1T 2R1	500.00	
243	Tong	Jian	57	Mentor Blvd		Toronto	ON	M2H 2M9	500.00	
244	Lu	Chunyan	57	Mentor Blvd		Toronto	ON	M2H 2M9	500.00	
245	Han	Fei	225	Nottingham Dr.		Oakville	ON	L6H 4H7	500.00	
246	Lin	Zhuangzhi	55	Pascoe Dr.		Markham	ON	L6B 1C4	500.00	
247	Huang	Qin	55	Pascoe Dr.		Markham	ON	L6B 1C4	500.00	
248	Gu	Ming	38	Braeside Sq.		Markham	ON	L3R 0A4	500.00	
249	Song	Han Ping	225	Nottingham Dr.		Oakville	ON	L6H 4H7	500.00	
250	Lu	Nan	226	Forest Hill Rd		Toronto	ON	M5P 2N5	500.00	
251	Feng	Jianjian	50	Quail Run Blvd		Maple	ON	L6A 1E9	500.00	
252	Wang	Hong	50	Quail Run Blvd		Maple	ON	L6A 1E9	500.00	
253	Hou	Hujun	10	Dell Glen Crt		Thornhill	ON	L3T 2A3	500.00	
254	Zhang	Xiaoxia	10	Dell Glen Crt		Thornhill	ON	L3T 2A3	500.00	

Jim Karygiannis Part II - Table 1 Detailed Listing

Number	Contributor last_name	Contributor first Name	Street Number	Street Name	Suite	City	Province	Postal Code	Amount exceeding \$100	Amount \$100 or less
255	Xu	Alwen	83	Heathcote Ave		Toronto	ON	M2L 1Z3	500.00	
256	Zhang	Lin	83	Heathcote Ave		Toronto	ON	M2L 1Z3	500.00	
257	Zhu	Yan	83	Heathcote Ave		Toronto	ON	M2L 1Z3	500.00	
258	Sun	Xiaodong	117	Forest Heights Blvd		Toronto	ON	M2L 2K7	500.00	
259	Zhou	Bing	117	Forest Heights Blvd		Toronto	ON	M2L 2K7	500.00	
260	Jiao	Hongmei	117	Forest Heights Blvd		Toronto	ON	M2L 2K7	500.00	
261	Jiao	Yingchun	117	Forest Heights Blvd		Toronto	ON	M2L 2K7	500.00	
264	Vavaroutsos	James	3168	Cedartree Cres		Toronto	ON	L4Y 3G4	500.00	
265	Restituto	Juan	201	Heward Ave		Toronto	ON	M4M 2T6	500.00	
280	Li	Sa	25	Bamburgh Cir	Unit236	Scarborough	ON	M1W 3W2	500.00	
282	Wu	Tiancai	150	Estelle Ave		Toronto	ON	M2N 5H7	500.00	
283	Ye	Jingping	150	Estelle Ave		Toronto	ON	M2N 5H7	500.00	
284	Smimis	Nikolaos	115	Millicent St		Toronto	ON	M6H 1W3	500.00	
305	Singh	Balwant	33	Harbour Sq	Unit3233	Toronto	ON	M5J 2G2	500.00	
318	He	Xiaobo	272	Upper Highland Cres		Toronto	ON	M2P 1V3	500.00	
319	Lou	Yu	25	Miriam Cres		Richmond Hill	ON	L4B 2P8	500.00	
320	Huang	Qiu-Ping	25	Miriam Cres		Richmond Hill	ON	L4B 2P8	500.00	
321	Kang	Zhaoyi	8	James Joyce Dr.		Markham	ON	L6C 0L6	500.00	
322	Xu	Xiaofang	272	Upper Highland Cres		North York	ON	M2P 1V3	500.00	
323	Ma	Liang	82	Crockart Lane		Aurora	ON	L4G 0Y6	500.00	
324	He	Qianyun	272	Upper Highland Cres		North York	ON	M2P 1V3	500.00	
325	Qin	Tan	226	Forest Hill Rd		Toronto	ON	M5P 2N5	500.00	
340	Love	Jon E.	155	Cumberland St	Unit2100	Toronto	ON	M5R 1A2	500.00	
341	Wong	Kelvin	7800	Woodbine Ave	UnitPH	Markham	ON	L3R 2N7	500.00	
373	Zhou	RuiZhen	67	Wayside Ave		Scarborough	ON	M1V 1N2	500.00	
380	Horvath	Ioan	58	Raleigh Ave		Scarborough	ON	M1K 1A3	500.00	
190	MacKinnon	Cameron	15	Vanity Crt		Toronto	ON	M3A 1W9	600.00	
281	Hu	Yan	82	Pemberton Ave		North York	ON	M2M 1Y3	600.00	
292	Swirsky	Eliahu	4950	Yonge St	Unit1010	Toronto	ON	M2N 6K1	600.00	
293	Cohen	Sam	4950	Yonge St	Unit1010	Toronto	ON	M2N 6K1	600.00	
331	Alexopoulos	Treandafelos Ake	270	Mathewson St		Maple	ON	L6A 1B3	700.00	
262	Bougadis	Antonia	10	St Dennis Dr.		Toronto	ON	M3C 1E9	750.00	
263	Bougadis	Peter	10	St Dennis Dr.		Toronto	ON	M3C 1E9	750.00	
184	Richards	Ronald	1568	Boxwood Way		Mississauga	ON	L5E 2X9	900.00	
42	Wang	Zheng Guang	29	Pilgrim Dr.		Markham	ON	L6C 1R9	1,000.00	
47	Wu	Yuling	2	Birdwood Ct		Scarborough	ON	M1W 3K2	1,000.00	
171	Chen	Sheng	84	Fresno Crt		Markham	ON	L3R 0T7	1,000.00	
172	Lin	Min	2	Dewbourne Ave		Richmond Hill	ON	L4B 3G7	1,000.00	
173	He	Hui	2	Dewbourne Ave		Richmond Hill	ON	L4B 3G7	1,000.00	
174	Lin	Fen	8	Graydon Cres		Richmond Hill	ON	L4B 3W1	1,000.00	
295	Xu	Yue Hua	3	Horner Crt		Richmond Hill	ON	L4B 3G7	1,000.00	
296	Lin	Hui Fang	3	Horner Crt		Richmond Hill	ON	L4B 3G7	1,000.00	
297	Lin	Guangtai	105	Highglen Ave		Markham	ON	L3R 8R8	1,000.00	
298	Lin	Xiaozhu	21	Eastdale Cres		Richmond Hill	ON	L4B 3E4	1,000.00	
299	Wang	Yuan Liang	56	Robinson St		Markham	ON	L3P 1N6	1,000.00	
300	Lin	Ting	84	Fresno Crt		Markham	ON	L3R 0T7	1,000.00	
301	Chen	Kan	15	Water St		Markham	ON	L3P 1N3	1,000.00	
302	Yeung	Boby	15	Water St		Markham	ON	L3P 1N3	1,000.00	
338	Johnson	Matthew	21	Montrose Ave		Toronto	ON	M6J 2T6	1,000.00	
339	Kennedy	Anna	3	Southway Rd		Etobicoke	ON	M9A 3Y1	1,000.00	
349	Emmanuel	Gratien	10175	Sheppard Ave E		Scarborough	ON	M1B 1G1	1,000.00	
350	Muthulingam	Kandavel	545	Highglen Ave		Markham	ON	L3S 4N3	1,000.00	
351	Alphonse	Krishanthi	10175	Sheppard Ave E		Scarborough	ON	M1B 1G1	1,000.00	
1	Jiraj	Namra	5028	Mississauga Rd		Mississauga	ON	L5M 4Y2	1,200.00	
2	Muhammad	Sulman Y.	5028	Mississauga Rd		Mississauga	ON	L5M 4Y2	1,200.00	
3	Ullah	Zefer	17	Navy Crt		Vaughan	ON	L6A 3X8	1,200.00	
4	Zefer	Lubna	17	Navy Crt		Vaughan	ON	L6A 3X8	1,200.00	
5	Rotstein	Mark	21	Elderwood Dr.		Toronto	ON	M5P 1W6	1,200.00	
6	Brandley	Joshua	73	Elm Ridge Dr.		Toronto	ON	M6B 1A2	1,200.00	
7	Merkur	James L.	306	Vesta Dr.		Toronto	ON	M5P 3A3	1,200.00	
8	Chapnik	Jason	33	Strathearn Rd		Toronto	ON	M6C 1R2	1,200.00	
9	Lafamme	Peter	2	Browning Ave		Toronto	ON	M4K 1V7	1,200.00	
10	Wang	Caroline C.	81	Lawton Blvd		Toronto	ON	M4V 1Z6	1,200.00	
11	Meretsky	Jason D.	43	Hawarden Cres		Toronto	ON	M5P 1M8	1,200.00	
12	Wu	Hao	22	Bellside Dr.		Markham	ON	L3P 7B8	1,200.00	
13	Jin	Xuezhe	515	Rosewell Ave.		Toronto	ON	M4R 2J3	1,200.00	
14	Zhang	Xiaoyue	5	Fairfield Pl		Markham	ON	L3T 7M7	1,200.00	
15	Zhang	Jiarui	5	Fairfield Pl		Markham	ON	L3T 7M7	1,200.00	
16	Zhu	Shurong	35	Penwood Cres		Toronto	ON	M3B 3B1	1,200.00	
17	Wu	Jiyuan	52	Forest Manor Rd	Unit402	Toronto	ON	M2J 0E2	1,200.00	
18	Levine	Accan	111	Bombay Ave		North York	ON	M3H 1C1	1,200.00	
19	Levine	Amy	111	Bombay Ave		North York	ON	M3H 1C1	1,200.00	
20	Fil	Emilia	27	Benbow Rd		Etobicoke	ON	M9P 3K1	1,200.00	
21	Green	June I.	125	Dunkirk Avenue		Sutton West	ON	L0E 1R0	1,200.00	
22	Berlinghoff	Chris	4024	Maddaugh Rd		Puslinch	ON	N0B 2J0	1,200.00	
23	Naiman	Daniel	1	Theodore Pl		Thornhill	ON	L4J 8E2	1,200.00	

Jim Karygiannis Part II - Table 1 Detailed Listing

Number	Contributor last_name	Contributor first Name	Street Number	Street Name	Suite	City	Province	Postal Code	Amount exceeding \$100	Amount \$100 or less
24	Whitmell	Ken	41	Valley Cres		Aurora	ON	L4G 4S4	1,200.00	
25	Hurst	Dan	705	Middleton Cres		Milton	ON	L9T 4C2	1,200.00	
27	Yang	Xiyun	2911	Bayview Ave	Unit205D	North York	ON	M2K 1E8	1,200.00	
28	Zhang	Qi	19	Hetherington Cres		Thomhill	ON	L4J 2M9	1,200.00	
34	Wang	Ping	9	Bogert Ave.	Unit1106	Toronto	ON	M2N 0H3	1,200.00	
35	Wang	Yi	55	Ivan Daniels Dr.		Markham	ON	L3S 3C5	1,200.00	
36	Guo	Zidu	40	Park Lane Cir.		North York	ON	M3C 2N2	1,200.00	
37	Wang	Xin	67	Laurier Ave		Richmond Hill	ON	L4E 4P5	1,200.00	
45	Zheng	Linqing	22	Lynda Mcneil Pl		Markham	ON	L3S 3E4	1,200.00	
46	Gao	Xiaowen	30	Wilclay Ave		Markham	ON	L3S 1S7	1,200.00	
48	Shi	Xiling	22	Windhill Rd		Markham	ON	L3S 1P2	1,200.00	
49	Yi	Zheng	477	Fred McLaren Blvd		Markham	ON	L6E 0S4	1,200.00	
50	He	Zongde	477	Fred McLaren Blvd		Markham	ON	L6E 0S4	1,200.00	
51	Yu	Wenping	30	Wilclay Ave		Markham	ON	L3S 1S7	1,200.00	
52	Yu	Xian	22	Lynda Mcneil Pl		Markham	ON	L3S 3E4	1,200.00	
181	Vella	Francesca	111	Coppard Ave		Markham	ON	L3S 2T5	1,200.00	
200	Sgambelluri	Domenic	30	Ruscoe Cres		Toronto	ON	M9P 1P3	1,200.00	
201	Rajadurai	Mukunth	3	Gordon Ave		Toronto	ON	M1S 1A6	1,200.00	
207	Wassermuhl	Kevin	521	Cranbruke Ave		Toronto	ON	M5M 1N9	1,200.00	
208	Gu	Qing	45	Vania Dr		Maple	ON	L6A 3X3	1,200.00	
209	Wang	Zhe	108	Lebovic Dr		Richmond Hill	ON	L4E 5C1	1,200.00	
210	Zhang	Qing	7	Abitibi St		Richmond Hill	ON	L4C 0R1	1,200.00	
211	Meretsky	Phillip	133	Hazeltan Ave	Unit801	Toronto	ON	M5R 0A6	1,200.00	
212	Burgess	Ramona	4199	Hwy 2		Newcastle	ON	L1B 1L9	1,200.00	
213	Lis	Howard	32	Shallmar Blvd		Toronto	ON	M6C 2J9	1,200.00	
214	Gao	Lan Lan	139	Purcell Sq		Scarborough	ON	M1V 3Y7	1,200.00	
215	Gao	Xiaojing	14	Purcell Sq		Scarborough	ON	M1V 3Y3	1,200.00	
216	Gao	Xiao Fang	41	Sunbird Cres		Scarborough	ON	M1V 3M6	1,200.00	
217	Gao	Shao Peng	37	Sunbird Cres		Scarborough	ON	M1V 3M6	1,200.00	
218	Ho	Ching Yu	37	Sunbird Cres		Scarborough	ON	M1V 3M6	1,200.00	
219	Gao	Kunrun	10	Purcell Sq		Scarborough	ON	M1V 3Y3	1,200.00	
223	Chen	Chunping	171	Frank Rivers Dr.		Scarborough	ON	M1W 3N3	1,200.00	
224	Guo	Yuezeng	126	Church Ave.		Toronto	ON	M2N 4G2	1,200.00	
225	Liu	Rongqiao	126	Church Ave.		Toronto	ON	M2N 4G2	1,200.00	
226	Chen	Shujie	9	Bogert Ave.		Toronto	ON	M2N 0H3	1,200.00	
232	Jalib	Asad Ullah	17	Navy Crt		Vaughan	ON	L6A 3J8	1,200.00	
266	Gunasegaram	Suthaharan	195	Potery Rd		Woodbridge	ON	L4H 3R7	1,200.00	
267	Perinparajah	Krishnaveny	5	Apollo Rd		Markham	ON	L3R 4C5	1,200.00	
268	Anparasas	Sivachchelvi	175	Kale Cres		Maple	ON	L6A 3R2	1,200.00	
269	Panchadcharaiyer	Vijayakumar	628	Birchmount Rd		Toronto	ON	M1K 1P9	1,200.00	
270	Vijayakumaran	Jeyanthi	628	Birchmount Rd		Toronto	ON	M1K 1P9	1,200.00	
271	Vijayakumaran	Vidyasankar	628	Birchmount Rd		Toronto	ON	M1K 1P9	1,200.00	
272	Ganesan	Sugumar	220	Duncan Mills Rd	Unit213	Toronto	ON	M3B 3J5	1,200.00	
273	Wassermuhl	Salomon	206	BloorSt W	Unit1801	Toronto	ON	M5S 1T8	1,200.00	
274	Haj-Shafei	Ali	16	Cedar Forest Crt		Thomhill	ON	L3T 2A4	1,200.00	
275	Du	Zhuang	86	Trojan Cres		Markham	ON	L6C 2N4	1,200.00	
276	Shen	Ying	12	Mistflower Rd		Toronto	ON	M2H 3G9	1,200.00	
277	Zhang	Xu	202	Bridle Path		North York	ON	M3C 2P7	1,200.00	
278	Zhou	Xirong	78	Forest Grove Dr.		North York	ON	M2K 1Z7	1,200.00	
285	Manahil	Naila	17	Navy Crt		Vaughan	ON	L6A 3X8	1,200.00	
286	Li	ZhongBin	50	Meadowsweet Lane		Richmond Hill	ON	L4E 1B8	1,200.00	
287	Yu	Wenwu	22	Windhill Rd		Markham	ON	L3S 1P2	1,200.00	
288	Yu	Li Yun	38	Bellefontaine St		Scarborough	ON	M1S 1J7	1,200.00	
289	Yu	Wen Bin	38	Bellefontaine St		Scarborough	ON	M1S 1J7	1,200.00	
291	Gun	Jianfei	21	Emmeline Cres		Toronto	ON	M1S 1L1	1,200.00	
313	Wang	Yan	81	Bambury Rd		Toronto	ON	M3B 2K9	1,200.00	
360	Yang	Fu Yuan	3121	Kennedy Rd		Scarborough	ON	M1V 4Y1	1,200.00	
361	Cheung	Jessica Man Yu	7800	Woodbine Ave	UnitPH	Markham	ON	L3R 2N7	1,200.00	
367	Yang	Junkun	30	Blossomview Crt		Whitby	ON	L1R 3G5	1,200.00	
368	Wang	Xiufang	30	Blossomview Crt		Whitby	ON	L1R 3G5	1,200.00	
369	Yang	Shirley	30	Blossomview Crt		Whitby	ON	L1R 3G5	1,200.00	
370	Yang	Jiansi	36	Splendor Dr		Whitby	ON	L1P 1X9	1,200.00	
374	Malhotra	Nitin	23	Bonnington Pl		Toronto	ON	M2N 4V2	1,200.00	
375	Bekederemo	Pere	36	Herkes Dr		Brampton	ON	L6Y 4Z2	1,200.00	
376	Ghassemi	Mahdieh Haji	9120	Leslie St	Unit208	Richmond Hill	ON	L4B 3J9	1,200.00	
377	Malhotra	Amy	23	Bonnington Pl		Toronto	ON	M2N 4V2	1,200.00	
Total									211,320.00	2,320.00

Table 2: Contributions in goods or services from individuals other than candidate or spouse
 (Note: must also be recorded as Expenses in Box C)

Name	Full Address	Description of Goods or Services	Date Received (yyyy/mm/dd)	Value \$
NIL				

☐ Additional information is listed on separate supplementary attachment

Total

Total for Part II - Contributions exceeding \$100 per contributor

(Add totals from Table 1 and Table 2 and record the total in Part 1 - Summary of Contributions)

\$ 209,000.00 1B

Part III – Contributions from candidate or spouse

Table 3: Contributions in goods or services

Description of Goods or Services	Date Received (yyyy/mm/dd)	Value \$
NIL		

☐ Additional information is listed on separate supplementary attachment

Total

Table 4: Inventory of campaign goods and materials from previous municipal campaign used in this campaign
(Note: value must be recorded as a contribution from the candidate and as an expense)

Description	Date Acquired (yyyy/mm/dd)	Supplier	Quantity	Current Market Value \$
SIGNS	2014/09/01	J Karygiannis	1100	6,349.44
<input type="checkbox"/> Additional information is listed on separate supplementary attachment				Total
				6,349.44

Schedule 2 – Fundraising Events and Activities

Fundraising Event/Activity

Complete a separate schedule for each event or activity held

☒ Additional schedule(s) attached

Description of fundraising event/activity EVENT 1 : BARBEQUE

Date of event/activity (yyyy/mm/dd) 2018/09/09

Part I – Ticket revenue

Admission charge (per person)

(If there are a range of ticket prices, attach complete breakdown of all ticket sales)

Number of tickets sold

\$ _____ 2A
X _____ 2B

Total Part I (2A X 2B) (include in Part 1 of Schedule 1)

= \$ _____

Part II – Other revenue deemed a contribution

(e.g. revenue from goods sold in excess of fair market value)

Provide details

1. _____	+ \$ _____
2. _____	+ \$ _____
3. _____	+ \$ _____
4. _____	+ \$ _____
5. _____	+ \$ _____

Total Part II (include in Part 1 of Schedule 1)

= \$ _____

Part III – Other revenue not deemed a contribution

(e.g. contribution of \$25 or less; goods or services sold for \$25 or less)

Provide details

1. _____	+ \$ _____
2. _____	+ \$ _____
3. _____	+ \$ _____
4. _____	+ \$ _____
5. _____	+ \$ _____

Total Part III (include under Income in Box C)

= \$ _____

Part IV – Expenses related to fundraising event or activity

Provide details

1. MAILING	+ \$ 10,289.16
2. STAFF FEES - MARGOT VICK	+ \$ 6,000.00
3. GEKO INVITATIONS / FLYERS / BROCHURES	+ \$ 3,322.20
4. LION DANCE	+ \$ 565.00
5. _____	+ \$ _____
6. _____	+ \$ _____
7. _____	+ \$ _____
8. _____	+ \$ _____

Total Part IV Expenses (include under Expenses in Box C)

= \$ 20,176.36

Schedule 2 – Fundraising Events and Activities

Fundraising Event/Activity

Complete a separate schedule for each event or activity held

☐ Additional schedule(s) attached

Description of fundraising event/activity EVENT 2: SANTORINI GRILL

Date of event/activity (yyyy/mm/dd) 2018/12/21

Part I – Ticket revenue

Admission charge (per person)

(If there are a range of ticket prices, attach complete breakdown of all ticket sales)

Number of tickets sold

\$	2A
X	2B

Total Part I (2A X 2B) (include in Part 1 of Schedule 1)

= \$

Part II – Other revenue deemed a contribution

(e.g. revenue from goods sold in excess of fair market value)

Provide details

1.	+	\$
2.	+	\$
3.	+	\$
4.	+	\$
5.	+	\$

Total Part II (include in Part 1 of Schedule 1)

= \$

Part III – Other revenue not deemed a contribution

(e.g. contribution of \$25 or less; goods or services sold for \$25 or less)

Provide details

1.	+	\$
2.	+	\$
3.	+	\$
4.	+	\$
5.	+	\$

Total Part III (include under Income in Box C)

= \$

Part IV – Expenses related to fundraising event or activity

Provide details

1. STAFF FEES - MARGO VICK	+	\$	10,000.00
2. GEKO INVITATIONS / BROCHURES / FLYERS	+	\$	1,751.50
3. DINNER	+	\$	4,032.00
4. FUNDRAISING EVENT SERVICES	+	\$	11,300.00
5.	+	\$	
6.	+	\$	
7.	+	\$	
8.	+	\$	

Total Part IV Expenses (include under Expenses in Box C)

= \$ 27,083.50

Auditor's Report*Municipal Elections Act, 1996 (Section 88.25)*

A candidate who has received contributions or incurred expenses in excess of \$10,000 must attach an auditor's report.

Professional Designation of Auditor

CHARTERED PROFESSIONAL ACCOUNTANT

Municipality

MARKHAM, ONTARIO

Date (yyyy/mm/dd)

2019/03/25

Contact Information

Last Name or Single Name

TSE

Given Name(s)

HENDERSON

Licence Number

1-12249

Address

Suite/Unit No.

305

Street No.

3950

Street Name

14TH AVENUE

Municipality

MARKHAM

Province

ON

Postal Code

L3R 0A9

Telephone No. (including area code)

905 305-7372

Email Address

htse@hendersontse.com

The report must be done in accordance with generally accepted auditing standards and must:

- set out the scope of the examination
- provide an opinion as to the completeness and accuracy of the financial statement and whether it is free of material misstatement

☒ Report is attached

Personal information, if any, collected on this form is obtained under the authority of sections 88.25 and 95 of the *Municipal Elections Act, 1996*. Under section 88 of the *Municipal Elections Act, 1996* (and despite anything in the *Municipal Freedom of Information and Protection of Privacy Act*) documents and materials filed with or prepared by the clerk or any other election official under the *Municipal Elections Act, 1996* are public records and, until their destruction, may be inspected by any person at the clerk's office at a time when the office is open. Campaign financial statements shall also be made available by the clerk in an electronic format free of charge upon request.

HENDERSON TSE CHARTERED PROFESSIONAL ACCOUNTANT
3950 - 14th Avenue, Suite 305, Markham, Ontario L3R 0A9 Canada
Tel: (905) 305-7372 Fax: (905) 305-6647 Email: htse@hendersontse.com

AUDITOR'S REPORT

MUNICIPAL ELECTIONS ACT, 1996 (SECTION 88.25)

To The Town Clerk and Whom It May Concern:

I have audited the Statement of Assets and Liabilities, the Statement of Surplus related to Jim Karygiannis, Ward 22 Councillor candidate, for the campaign period from May 1, 2018 to December 31, 2018 for the election held on October 22, 2018. These financial statements are the responsibility of Jim Karygiannis. My responsibility is to express an opinion on these financial statements based on my audit.

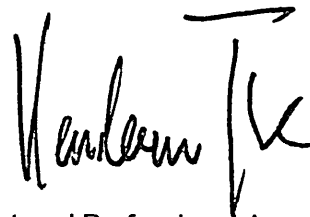
Except as explained in the following paragraph, I conducted my audit in accordance with Canadian generally accepted auditing standards. Those standards require that I plan and perform an audit to obtain reasonable assurance whether the financial statements are free of material misstatement.

An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by Jim Karygiannis, as well as evaluating the overall financial statement presentation.

Due to the nature of types of transactions inherent in an election campaign, it is impracticable through auditing procedures to determine that the accounting records include all donations of goods and services, and receipts and disbursements. Accordingly, I verification of these transactions was limited to the ensuring that the financial statements reflect the amounts recorded in the accounting records of Jim Karygiannis, in accordance with the accounting procedures established by the Municipal Elections Act, 1996.

In my opinion, these financial statements present fairly, in all material respects, the financial position of the candidate's election campaign as at December 31, 2018 and the income and expenses for the campaign period from May 1, 2018 to December 31, 2018 and the determination of surplus or deficit and the disposition of surplus in accordance with the accounting treatment prescribed by the Municipal Elections Act, 1996.

The Municipal Elections Act, 1996 does not require me to report, nor was it practicable for me to determine, that contributions reported include only those which may be properly retained in accordance with the provisions of the Municipal Elections Act, 1996.



Markham, Ontario
March 22, 2019

Chartered Professional Accountant
Chartered Accountant
Licensed Public Accountant

Tab 2

Jim Karygiannis Campaign
 Campaign period : May 1, 2018 to October 22, 2018)
 Honorarium

	Date	Ref	Payee & remarks	Honorarium honorarium
1				5,000.00
2	1-Dec-18	43	Joanne Fusillo -Adema]	4,000.00
3	2-Dec-18	42	John Kalina	5,000.00
4	5-Dec-18	41	Gwen Mackay	3,000.00
5	19-Nov-18	35	Nick Bibassis	2,000.00
6	14-Nov-18	34	Leobardo Ahumada	4,000.00
7	15-Nov-18	27	Leung Ting Wai	2,000.00
8	3-Nov-18	20	William Dynes	1,000.00
9	28-Oct-18	14	Berj Hajenian	5,000.00
10	30-Oct-18	23	Wang Peng Fei	10,000.00
11	5-Nov-18	25	Xie Shilang	5,000.00
12	18-Nov-18	28	Kevin Haynes	3,000.00
13	10-Nov-18	26	Jasmine Mann	5,000.00
14	30-Oct-18	18	Satnam Singh Mahil	5,000.00
15	30-Oct-18	19	Gurmit Kavr	5,000.00
16	30-Oct-18	17	Vinod Bains	2,000.00
17	29-Oct-18	16	Adnan Tahir	2,000.00
18	26-Oct-18	13	Rui Zeng	6,000.00
19	3-Nov-18	22	Hayas Yaran	3,000.00
20	5-Nov-18	21	Leung Ting Wai	3,000.00
21	12-Nov-18	24	Leung Ting Wai	1,000.00
	28-Jan-19	54	HAGOL IMASDONUNIAN	
			Total	81,000.00

f/mon...

Tab 3



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Scarborough councillor raised \$150,000 over spending limit in Toronto election

By **David Nickle** Toronto.com
Thu., May 9, 2019



Councillor Jim Karygiannis raised over \$217,000 to win his seat last year — exceeding his campaign spending limit in the 2018 municipal election by more than \$150,000 and pulling far ahead of his elected colleagues on Toronto council.

Karygiannis' total fundraising haul of \$217,669.44 was revealed in election finance filings made public recently by Toronto's elections office.

The amount is notably high — over \$100,000 more than the nearest winning councillor in Toronto's 2018 municipal election, and \$75,000 more than his opponent, former deputy mayor Norm Kelly, who raised \$123,510.

"People donated to my campaign, and I'm very thankful," said Karygiannis (Ward 22 Scarborough-Agincourt), when asked about the unusually large amount of money he raised. "We had two fundraising events, people were encouraged to fund-raise, people went to the website, people sent us cheques, and I'm very grateful to them."

Kelly and Karygiannis were forced to face off in the northwest Scarborough ward when the two wards they had represented disappeared after the provincial government cut the size of Toronto council from 47 to just 25 in July of 2018.

They were not alone in this: 10 other Toronto wards saw incumbents paired off in fierce competition to represent the new, larger wards.

But few in those races raised anywhere close to what either Karygiannis or Kelly raised. Some, like Michael Ford in Ward 1

(Etobicoke North) or Anthony Perruzza in Ward 7 (Humber River—Black Creek), raised over \$90,000, and Josh Matlow, in a battle with veteran councillor Joe Mihevc for Ward 12 (Toronto—St. Paul's), raised just over \$110,000. But others raised far less. Ward 2 (Etobicoke Centre) Councillor Stephen Holyday raised just \$29,219.21.

Under provincial rules, Karygiannis and Kelly were only able to spend \$61,207.95 on the actual election campaign, but were able to spend a limited amount of money on post-election expenses. Any surplus beyond that must be returned to the city.

Listed among those expenses — which include the cost of wrapping up the campaign's finances and a small thank-you celebration — was \$81,000 in "honoraria," paid out to 21 individuals.

Karygiannis did not submit receipts or invoices for those honoraria with his documentation, but only a list of names and dates, running from Dec. 1, 2018, to Jan. 29, 2019. Honoraria ranged from \$1,000 to \$10,000 to one individual.

"The honoraria were given to people that helped us transition from the 44 wards to the 25 wards — people picking up signs, cleaning up signs, doing the data ... fixing the database that was there. It was a database that was all over the map," said Karygiannis. "We followed the rules. I asked about the rules, and we followed the rules."

Ward 10 (Spadina—Fort York) Councillor Joe Cressy said that while he raised more than the spending limit — \$91,209 — there came a point where his campaign started turning donors away.

"When we realized we were over the limit, we started telling donors not to give money and we returned the surplus to the city," he said. "I don't know why anyone would need to spend that kind of money after the election."

Cressy said that while there were post-election expenses involved in closing out his campaign, they were minor.

"There might have been a thank-you letter that went out, and we paid for the audit to be done," he said. "But unless you're buying iPads for every single volunteer, I'm not sure what you're spending the money on."

Karygiannis noted that he returned \$27,000 to the city's election office when all his expenses were accounted for.

Adam Chaleff, a former activist who during former Mayor Rob Ford's tenure worked on a range of campaign audit requests through Fair Elections Toronto, said the honoraria seemed unusual.

"It is highly abnormal to see payments of that nature," he said.

"Generally, people spend much less money after people finish voting than before they vote. In this case, the candidate spent on honoraria alone almost double what he spent during the campaign that was subject to the limit. It begs the question — what could these people possible have been doing that was so valuable after the vote?"

In a brief interview, Norm Kelly would not comment on Karygiannis' fundraising efforts but did acknowledge Karygiannis, who had prior to 2014 served as the Liberal MP for the riding (and now the ward), was a formidable opponent.

"I knew that absolutely, right from the beginning," said Kelly. "One of the cardinal rules of running an election is not underestimating an opponent."

Correction - May 10, 2019: This article was edited from a previous version that mistakenly said Jim Karygiannis was the former Liberal MPP for Scarborough-Agincourt. In fact, he represented the riding in the House of Commons from 1988 until his resignation in 2014.

David Nickle is a reporter and columnist for Metroland Media Toronto, who specializes in municipal politics. He is also an author of speculative fiction. His most recent book is VOLK: A Novel of Radiant Abomination. Email: dnickle@toronto.com

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LEVY: Councillor uses campaign funds to pay supporters \$81Gs

[Sue-Ann Levy](#)

More from Sue-Ann Levy

Published:

May 22, 2019

Updated:

May 22, 2019 7:40 AM EDT

Filed Under:[Toronto SUN](#) > [News](#)[Toronto & GTA](#)

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Councillor Jim Karygiannis is pictured during a city council meeting on Dec. 13. (Ernest Doroszuk, Toronto Sun)

A review of Councillor Jim Karygiannis' 2018 campaign expenses shows he raised \$217,669 some \$81,000 of which was handed to 18 supporters as honoraria.

According to his financial statement filed with the city's elections office on March 27, the former long-time Liberal MP — who last fall was in a tight race with then-councillor Norm Kelly — was only eligible to spend \$61,207 on his campaign based on the number of electors in his new ward (Ward 22).

According to the Municipal Elections Act (MEA), he was also entitled to spend \$6,120 to hold parties or express appreciation (to supporters) after voting day.

His audited statement indicates he charged only \$43,812.55 worth of expenses subject to the general spending limit.

A total of \$146,645.67 was declared as expenses not subject to that limit.

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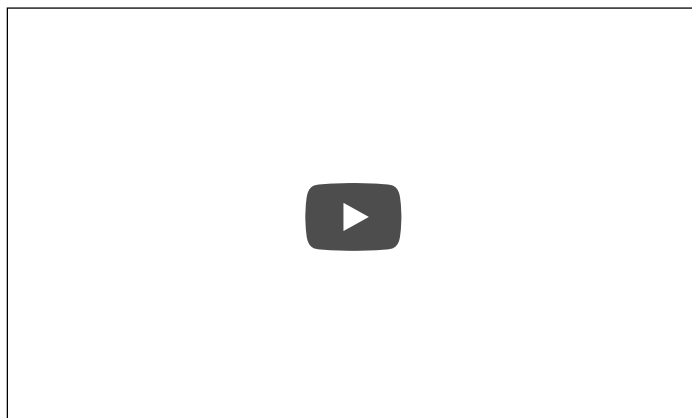
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The largest expenditure was \$81,000 in honoraria to 18 people, including three separate payments, totalling \$10,000 to Leung Ting Wai; \$4,000 to immigration lawyer John Kalina; \$5,000 for his senior legislative assistant, Joanne Fusillo-Ademaj; \$3,000 to would-be Liberal candidate, Nick Bibassis; and \$5,000 to Kevin Haynes, an intern with the Liberal Party of Canada.

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Karygiannis also expensed \$47,259 for fundraising activities. That included a BBQ with a lion dance (at a special rate of \$565 according to the invoice) last Sept. 9 and another event at Santorini Grill last Dec. 21.

For the latter event, he spent \$11,300 on fundraising event services and \$10,000 for staff fees to Ottawa resident Margot Doey-Vick who has worked for Karygiannis in the past and who was once the finance agent for the Scarborough-Agincourt Liberal Association.

Doey-Vick was paid a another \$6,000 for the first set of fundraising activities which including drafting a fundraising letter, delivering it to prospective donors, making follow-up calls and arranging for the collection of donations.

Deputy city clerk of elections Fiona Murray told me Tuesday that a candidate can raise as much money as he or she wants but there is a limit on what they can spend based on their population.

She said there are a few things that aren't counted towards the expense limit — based on a complicated set of rules — but the MEA is “silent” on the payment of honoraria.

Murray said that if the councillor has not exceeded his expense limit, all donors would be entitled to a tax-funded rebate. For donations from \$25 to \$300, they're entitled to get 75% back. The rebate for donations beyond that (\$1,200 is the maximum that can be donated per candidate) are based on a sliding scale up to \$1,000.

In an e-mailed response, Karygiannis stated that his election return was submitted “following all the electoral rules and regulations” and

after he'd sought advice and "got clarification" from the election department. He did not name from whom he'd sought clarification.

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He said the honoraria were given to those who assisted his team by providing legal advice, connected his team to "community stakeholders," helped with collecting and cleaning election signs and provided other services.

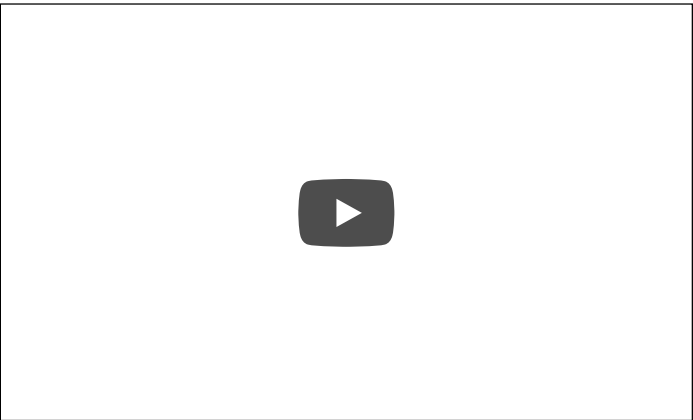
He said that using a paid person to assist with his two fundraising events is "allowable in the legislation and does not count towards campaign expenses."

Karygiannis added that his surplus of \$27,211 left over from his campaign was returned to the city clerk and his bank account closed.

Murray said elections staff do not scrutinize a campaign's financial statements once they are filed but do post them online for the sake of transparency.

"An eligible elector who believes a candidate has contravened the election campaign finance rules under the MEA can apply for a compliance audit," she said, noting the deadline is 90 days after the statement has been filed.

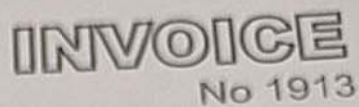
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Tab 5



No 1913

Address: **11 Ivy Bush**

Toronto, ON M1V 2W7

Tel.: 416.499.4588

Date: August 31, 2018

[illegible]

Tab 6



Invoice date (Y-M-D) **2018-08-27**
Customer number **1024941**
Invoice number **9663132099**
Customer ref. 1
Customer ref. 2

Your details

Order date
(Y-M-D)
Order no.

Reference

Number
of items

Weight (g)/
item

Price/item

Weight price

Service description

Amount

Neighbourhood Mail

2018-08-22
C167966258

Mailed by: JIM KARYGIANNIS
Agreement no. 0043551538

18,396

30.00

0.12300

Neighb MI Std

2,262.71

Subtotal

2,262.71

HST (ON)

294.15

Total

\$2,556.86

2018-08-22
C167967402

Mailed by: JIM KARYGIANNIS
Agreement no. 0043551538

20,016

30.00

0.12300

Neighb MI Std

2,461.97

Subtotal


2,461.97

HST (ON)

320.06

Total

\$2,782.03

 Total number of items

38,412

Neighbourhood Mail

\$5,338.89

Paid by Credit Card

-\$5,338.89

Thank you for your business.

Tab 7



Neighbourhood Mail - Fully Featured
Courrier de quartier - Haut de gamme

Mailed By Customer Number / Expédié par N° du client: 1024941
JIM KARYGIANNIS
61 LAMBETH SQ
SCARBOROUGH ON M1W3B3 416-410-3170
Mailed on behalf of / Expédié au nom de: 1024941 JIM KARYGIANNIS
CIF ACMA: No / Non
Customer Reference / Référence du client:
Pieces Size / Format des articles: Up to/Jusqu'à 30.5x15.24x1.9 cm (12x6x0.75 in)

C167983502

Customer Client

Paid By Customer No. / N° du client/compte

1024941

Method of Payment / Mode de paiement

Credit Card / Carte de crédit

Contract No. / N° de la convention

43551538

Transmitted/Transmis: 2018/08/29 10:46 EDT

Deposit Summary / Sommaire du dépôt

Location Name / Nom du bureau:
Deposit Date / Date du dépôt:

(Direct to DI / Directement aux IL)



ZLRL 33003 16798 35020 00000 0000

Acceptance and RTO Scans Required (CPC use only)

Balayage d'acceptation et RTO requis (À l'usage de SCP seulement)

Service Description / Description du service	Pieces / Articles	Weight / Piece / Poids / article
Neighb MI Std / C. de quartier st		

Entire Mailing / Envoi complet

Product / Produit	Cost Centre Reference / Référence centre de coûts	Deposit Date / Date du dépôt	Pieces / Articles	Weight/Piece / Poids/article	\$ / Piece / \$ / article	\$ / kg	Start Date de livr. / \$ / Piece / \$ / article	Transportation / Transport / Pieces / \$ / Piece / Articles / \$ / article	Total Cost (\$) / Total des frais (\$)
10005		2018/08/31	35,616	30.00 g	\$0.12300				\$4,380.77
TOTAL			35,616	1,068.48 kg					\$4,380.77
Deposit Type / Type de dépôt									
Direct to DI / Directement aux IL									
Base Charges / frais de base									\$4,380.77
Sub-total Before Taxes / Total partiel avant les taxes									\$4,380.77
GST/TPS \$0.00 HST/TVH \$569.50 PST/TVP \$0.00									\$569.50
Total Amount Due to CPC / Montant total dû à la SCP									\$4,950.27

PRVS Site 6904
Received by PRVS Employee

2018 -08- 31

Received by Initials / Employee No.
Reçu par Initiales / N° de l'employé:

Scarborough Delivery Centre
280 Progress Ave

Customer warrants that the order details listed above are
in accordance with the terms and conditions specified
in the Customer's Agreement and has been validated for
accuracy of information contained within.

Le client garantit que les détails de la commande ci-dessus ont
été vérifiés en conformité avec les termes et conditions spécifiés
dans l'entente du client et a été validé pour l'exactitude des
renseignements qu'il contient.

Customer Signature / Signature autorisée du client:

N° SCP TVH 119321495

Customer must accompany your mailing to the Accepting Location.
Le client doit accompagner votre envoi au bureau de dépôt.

Tab 8



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→ Scarborough--Agincourt [Federal electoral district], Ontario and Richmond, [CTY \(County\)](#) [Census division], ...

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Scarborough--Agincourt [Federal electoral district], Ontario and Richmond, County [Census division], Nova Scotia

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Characteristic	Scarborough--Agincourt Ontario [Federal electoral district]			Richmond, CTY (County) Nova Scotia [Census division]		
	Total	Male	Female	Total	Male	Female
Population and dwellings						
Population, 2016 ¹	105,542	... (not applicable)	... (not applicable)	8,964	... (not applicable)	... (not applicable)
Population, 2011 ¹	104,499	... (not applicable)	... (not applicable)	9,293	... (not applicable)	... (not applicable)
Population percentage change, 2011 to 2016	1.0	... (not applicable)	... (not applicable)	-3.5	... (not applicable)	... (not applicable)
Total private dwellings ²	37,883	... (not applicable)	... (not applicable)	5,122	... (not applicable)	... (not applicable)
Private dwellings occupied by usual residents ³	36,712	... (not applicable)	... (not applicable)	3,983	... (not applicable)	... (not applicable)
Population density per square kilometre	4,939.9	... (not applicable)	... (not applicable)	7.2	... (not applicable)	... (not applicable)
Land area in square kilometres	21.37	... (not applicable)	... (not applicable)	1,249.33	... (not applicable)	... (not applicable)

Characteristic	Scarborough--Agincourt Ontario [Federal electoral district]			Richmond, CTY (County) Nova Scotia [Census division]		
	Total	Male	Female	Total	Male	Female
Age characteristics						
Total - Age groups and average age of the population - 100% data ⁴	105,545	49,690	55,855	8,965	4,370	4,595
0 to 14 years	14,305	7,275	7,030	1,095	545	555
0 to 4 years	4,880	2,500	2,385	310	155	150
5 to 9 years	4,875	2,485	2,390	345	185	160
10 to 14 years	4,540	2,290	2,260	440	200	245
15 to 64 years	68,610	32,865	35,745	5,385	2,650	2,735
15 to 19 years	5,805	3,015	2,785	475	235	235
20 to 24 years	6,980	3,620	3,360	410	205	205
25 to 29 years	7,595	3,835	3,760	330	170	160
30 to 34 years	6,550	3,145	3,405	320	160	155
35 to 39 years	5,555	2,605	2,955	410	185	225
40 to 44 years	6,140	2,775	3,365	530	265	260
45 to 49 years	7,425	3,365	4,055	590	290	300
50 to 54 years	8,430	4,020	4,405	675	310	360
55 to 59 years	7,410	3,395	4,020	790	365	425
60 to 64 years	6,720	3,090	3,630	865	455	410
65 years and over	22,630	9,555	13,080	2,480	1,175	1,305
65 to 69 years	6,225	2,765	3,465	840	420	420
70 to 74 years	4,565	2,005	2,560	635	320	315
75 to 79 years	4,270	1,800	2,465	430	190	240
80 to 84 years	3,700	1,600	2,100	290	135	160
85 years and over	3,875	1,380	2,495	280	110	170
85 to 89 years	2,445	920	1,520	170	75	90
90 to 94 years	1,125	385	740	90	25	65
95 to 99 years	270	75	195	25	10	15
100 years and over	45	5	45	5	0	0

Characteristic	Scarborough--Agincourt Ontario [Federal electoral district]			Richmond, CTY (County) Nova Scotia [Census division]		
	Total	Male	Female	Total	Male	Female
Total - Distribution (%) of the population by broad age groups - 100% data	100.0	100.0	100.0	100.0	100.0	100.0
0 to 14 years	13.6	14.6	12.6	12.2	12.5	12.1
15 to 64 years	65.0	66.1	64.0	60.1	60.6	59.5
65 years and over	21.4	19.2	23.4	27.7	26.9	28.4
85 years and over	3.7	2.8	4.5	3.1	2.5	3.7
Average age of the population	43.9	42.2	45.4	48.2	47.6	48.7
Median age of the population	44.9	42.6	46.6	52.7	52.2	53.1
Household and dwelling characteristics						
Total - Occupied private dwellings by structural type of dwelling - 100% data ⁵	36,710	... (not applicable)	... (not applicable)	3,985	... (not applicable)	... (not applicable)
Single-detached house	11,155	... (not applicable)	... (not applicable)	3,450	... (not applicable)	... (not applicable)
Apartment in a building that has five or more storeys	16,595	... (not applicable)	... (not applicable)	5	... (not applicable)	... (not applicable)
Other attached dwelling ⁶	8,955	... (not applicable)	... (not applicable)	285	... (not applicable)	... (not applicable)
Semi-detached house	1,335	... (not applicable)	... (not applicable)	30	... (not applicable)	... (not applicable)
Row house	4,280	... (not applicable)	... (not applicable)	10	... (not applicable)	... (not applicable)
Apartment or flat in a duplex	1,610	... (not applicable)	... (not applicable)	40	... (not applicable)	... (not applicable)
Apartment in a building that has fewer than five storeys	1,680	... (not applicable)	... (not applicable)	200	... (not applicable)	... (not applicable)
Other single-attached house	45	... (not applicable)	... (not applicable)	5	... (not applicable)	... (not applicable)
Movable dwelling ⁷	5	... (not applicable)	... (not applicable)	245	... (not applicable)	... (not applicable)

ADAM CHALEFF

and JIM KARYGIANNIS

Applicant

Respondent

IN THE MATTER OF an Application under s. 88.33(1) of the *Municipal Elections Act, 1996*

**CITY OF TORONTO COMPLIANCE
AUDIT COMMITTEE**

**SUBMISSIONS AND SUPPORTING
DOCUMENTS OF THE APPLICANT**

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Lawyers for the Applicant, Adam Chaleff

June 4, 2019

Delivered by email clerk@toronto.ca

Uli S. Watkiss
City Clerk's Office
Toronto City Hall
100 Queen Street West, 13th Floor
Toronto, ON M5H 2N2

Delivered by email candidateinfo@toronto.ca

City of Toronto Election Services
100 Queen Street West
1st Floor N
Toronto, ON M5H 2N2

Delivered by email councillor_karygiannis@toronto.ca

Councillor Jim Karygiannis
Toronto City Hall
100 Queen Street West, Suite A1
Toronto, ON M5H 2N2

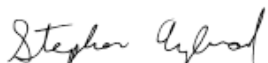
Dear Ms. Watkiss, City of Toronto Election Services and Councillor Karygiannis:

Re: Application for a compliance audit of the campaign finances of Councilor Jim Karygiannis in respect of the 2018 election

We are counsel to Adam Chaleff, the applicant in the above noted matter. Please find enclosed an application form under s. 88.33(1) of the *Municipal Elections Act* regarding the campaign finances of Councillor Jim Karygiannis in connection with the 2018 municipal election for the City of Toronto.

Please let me know if I can provide any further information at this time. We look receiving notice of the meeting of the compliance audit committee.

Yours truly,



Stephen Aylward
SA/ac

Encl.