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The financial statement the candidate filed on March 26, 2021(here referred as "the Statement") was incorrect and incomplete, and did not comply with the Municipal Elections Act., 1996 (here referred as "the Act").

1. The statement disclosed that the candidate received contributions of goods (used rebars) from Jim Karygiannis, his former boss, and Demetra Karygiannis. These used rebars were the properties of Jim Karygiannis' campaigns. The candidate knowingly received such contributions of goods/funds in the name of Demetra Karygiannis to avoid the contribution limit. The candidate did not include the receipts of the said contributions/expenses when he filed the statement and participated in the rebate program.
2. The statement did not disclose that the candidate received contributions of endorsement services from celebrities including Aris Babikian, MPP for Scarborough Agincourt (City Ward 22), two Senators and two from the Charity/Church. The candidate did include the endorsement information but did not value the services. The candidate did not issue the receipts of the said contributions and record them as expenses. *2018 Candidates' guide for Onratio municipal council and school board elections (here referred as "the guide") did exclude the things that are not contributions: the value of free political advertising, provided that such advertising is made available to all candidates and is in accordance with the Broadcasting Act (Canada) is not considered to a*

contribution. The said endorsements were made available only to the candidate.

3. The statement disclosed the $27764.25 expenses of brochures/Flyers: the printing costs of Brochure #1 ***(Attachment N10-N11 was a sample of Brochure #1)***, Brochure #2 by the Press Room, a Vancouver-base company, and Postcard #1 by Pristine Printing Inc., and the distribution costs by Canada Post. The candidate signed his business contract (Contract # 43837516) with Canada Post. The candidate's campaign mailed flyers, postcards etc. through this business contract (#43837516) account and received Canada Post's considerable discount. The disclosed three mailings' discount reached $3367.07+$2580.11+$2762.90=$8710.08. *The guide states: a corporation cannot make a contribution. If you are given a special discount on a good or service that you are purchasing for your campaign, you should record the expenses as if you were not given the discount (since the value of the discount is considered to be a contribution of the good or service to your campaign).* Therefore, the discount of $8710.08 should be added to the expenses.
4. The statement disclosed three Canada Post receipts:
   A) Distribution # C170404877 (here marked as D#1) pointed to Brochure #1 (11x17 trifold, 35838 pieces, less than 40000 pieces, 30.00g weight/piece;
   B) Distribution # C170507138 (here marked as D#2) showed 38377 pieces, 30.00g weight/piece, same as

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Brochure #1, indicating that it did not match Brochure #2 (11x25.5, 8 panel full colour brochure);

C) Distribution # C170511833 (here marked as D#3) showed that the mailing materials were from "Address-all Mailing Services", and there were 41065 pieces mailed out while Pristine Printing Inc. only printed 40000 pieces.

D) **In a word, the statement did not disclose the expenses of about $20000: the printing costs of D#2(about $4000) and D#3(about $3300); the distribution costs of Brochure #2 (about $6000) and Postcard#1(about $6000).**

5. The statement did not fully disclose the expenses of campaign lines and other products from Telus. The receipts included dozens of pages and the candidate did not disclose most of the pages. The receipts seemed to indicate that the candidate converted his family's mobile services into his campaign lines and other services from Telus into campaign office expenses. Many of the invoices indicated the address of [redacted] as one of the campaign offices, and the candidate even used the address on his campaign cheques.

6. The statement disclosed $10735.00 sign expenses with only an invoice of $3107.50 and the copy of a cheque payable to Mack Media Inc. Without the bank statements, whether the cheque was cashed and endorsed by the service provider, remained unknown. No other receipts. Did it

include the contributions/expenses of $1412.50 worth rebars? Unknown.

7. The statement showed that the candidate's supporters borrowed $28600 from their credit card companies in order to support his campaign. These funds were loans, rather than contributions. Whether these loans had been paid back to the credit card companies during his campaign remains unknown. The candidate did claim $705.61 processing expenses of these loans, but did not disclose the interest expenses of the loans. The guide only permits the candidate to get a loan from a bank or other recognized institutions in Ontario, and it must be paid directly into the candidate's campaign account. The candidate may not receive a loan from family members, let alone the supporters. The contribution from Wendy Bishop (#84 on the Contribution List) is said to belong to Steven Bishop.
8. The statement disclosed that the candidate purchased the consulting services from Apollo Tech Limited and the copy of a money draft in the amount of $5650.00 payable to Apollo Tech was filed with the statement, but whether the money draft was cashed and endorsed by the service provider remained unknown.
9. The statement did not disclose the bank statements of his campaign account, therefore, whether the candidate deposited every contribution into his campaign account or

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paid every expense from his campaign account including any of the bank charges, remained unknown.

Further to the reasons and the supporting documents I set out on my application, I would like to provide the followings:

10. The candidate disclosed Invoice 001 of Apollo Tech (See Attachment N35). My attachments N38-N48 showed that the owner, Andre Lucas, of Apollo Tech Limited had another corporation BA MUSKOKA at the same address, 1406-110 Cumberland St, Toronto, On., M5R 3V5, who also provided the consulting services to Tony Luk, another Ward 22 candidate of this same by-election during the same period. (See my attachments T77-T84).

11. The invoices were much identical, such as address, email. Even the invoice # was the same: Invoice 001, altering the suite # to be 304 for Apollo Tech (limited) while adding "consulting" to "BA MUSKOKA". All the information leads the public to believe that the two candidates were campaigning jointly for one office. Can one consultant consult two candidates at the same time at the same period for the same ward and for the only one office? Even so permitted, they should keep their finances separated. I suspected that Candidate Tony Luk paid $15000 for Campaign to elect Nick Mantas, not for his own campaign while Luk mailed out his flyers through the candidate's Canada Post account, paying less and claiming more rebates.

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12. The Act requires the candidate to keep the receipt of each expense, not the invoice. If without the receipt, the candidate should have the invoice signed by the service provider and the payment cheque/money draft should be cashed and endorsed by the service provider. The bank statement comes with the copies of the endorsed cheque/money order. The bank statement also verifies the bank service charges if any.

That's my written submission to add (three more issues).