My name is Roland Lin. I was a candidate running in the City Councillor election for Ward 22, Scarborough-Agincourt in 2018. I also filed a Compliance Audit Application for the Election Campaign Finances of the candidate, Jim Karygiannis.

1. In my supplementary submission marked as B1-B13, as an applicant of the Compliance Audit Application, I found that the candidate, Jim Karygiannis, had raised $\$ 136649.44$ by September 5, 2018., before Grand Opening of The Jim Karygiannis Campaign Headquarters on September 9,2018 . The funds he raised up to then were more than doubling the spending limit-General of \$61207.95.
2. The Brochure, advertising the Grand Opening of the Campaign Headquarters and being mailed to the neighborhood communities in Ward 22, called for the constituents to "Come and start the campaign with us (his team)". The Brochure advertised the location, the time of the Grand Opening, and also the phone and fax number, the email address and the website of the Campaign. That was the primary purpose. It did not matter how much contains were on the Brochure and how much more funds the Grand Opening could collect. It could not change the nature, the primary purpose of the Grand Opening. If the Brochure or other flyer was mailed to the potential contributors, the expenses of the mailing costs could be the costs of the fundraising. However, there was no evidence of such cost.
3. Grand Opening took place between $3: 00 \mathrm{pm}-5: 00 \mathrm{pm}$ on September 9,2018 . During the two hours, there was a lion-dancing, and several individuals spoke at the event. One reporter took the video, which would speak the truth. The candidate stated that there was a table at the BBQ event where individuals dropped off their completed donation forms (from the mailed brochures) and cheques for the campaign. According to his donation listing B, 59 contributions, totaling $\$ 21730$, were received. I checked the city government's records, 8 accounts of $\$ 6500$ were received before the Grand Opening and 34 contributors, totaling about $\$ 16500.00$, were not in Ward 22.
4. If, by adding more contains of fundraising information to the brochure or election sign, the expenses can become the cost of fundraising and can be excluded from the limits, there would be no need for the city government to set the limits.
5. As for Santorini Grill Event, the findings by MNP could only confirm that Ms Gwen MacKay attended the Event. MNP requested all information related to the December 21, 2018 Santorni Grill event including invitations and attendance list, however these were not provided. The candidate had 2000 copies of the invitation printed and the invitation list included those individuals who intended to donate after the voting day. Why did the candidate was reluctant to provide the contact information? MNP also did not explain of my suspicion why the receipt was issued before the restaurant was opened that Friday and how many would turn up at the dinner that night.
6. Can any payment except the accounting ones be made outside the campaign period? MNP missed auditing the October $30^{\text {th }} 2018$ invoice of Tim Hortons. It was closed on December 20, 2018. The HST number on the invoice belonged to the nearby Tim Horton on the Steeles Ave West. Every receipt should be kept by the candidate and could be reproduced from the Tim Horton within six years.

lection: 2018 Municipal Election (25 Wards)
Search conditions:
-Candidate/Reglstrant Name: Karygiannis
-Contributor Type: All

$B_{1}$



259 Zhou, Bing
260 Jiao, Hongmei
261 Jiao, Yingchun
234 Gui, Dongdong
237 Wang, Sujia
${ }_{230}$ Hung, Felicia
231 Hung, Adrian
1 Jiraj, Namra 2 Muhammad, Sulman Y .
${ }_{3}$ Ullah, Zefer
4 Zefer, Lubna
${ }_{5}$ Rotstein, Mark
${ }_{6}$ Brandley, Joshua
${ }_{7}$ Merkur, James L.
${ }_{8}$ Chapnik, Jason
g Laflamme, Peter
${ }_{10}$ Wang, Caroline C.
11 Meretsky, Jason D.
${ }_{12} \mathrm{Wu}$, Hao
13 Jin, Xuezhe
14 Zhang, Xiaoyue
15 Zhang, Jiarui
${ }_{16}$ Zhu, Shurong
${ }_{17} \mathrm{Wu}$, Jiyuan
18 Levine, Accan
19 Levine, Amy
${ }_{20}$ Fil, Emilia
21 Green, June I.
22 Berlinghoff, Chris
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${ }_{23}$ Naiman, Daniel
24 Whitmell, Ken
25 Hurst, Dan
232 Jalib, Asad Ullah
265 Restituto, Juan
281 Hu , Yan
262 Bougadis, Antonia
263 Bougadis, Peter
277 Zhang, Xu
278 Zhou, Xirong
279 Chung, Michael
282 Wu , Tiancal
283 Ye , Jingping
266 Gunasegaram, Suthaharan
276 Shen, Ying
280 LI Sa
267 Perinparajah, Krishnaveny
268 Anparasan, Sivachchelvi
274 Haj-Shafiel, Ali
275 Du, Zhuang
269 Panchadcharaiyer, Vijayakumar
270 Vijayakumaran, Jeyanthy
${ }_{26}$ Demarco, Judita
27 Yang, Xiyun
$28^{\text {Zhang, Qi }}$
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${ }_{33}$ Garabedian, Garo
${ }_{34}$ Wang, Ping
${ }_{35}$ Wang, Yi
${ }_{36}$ Guo, Zidu
${ }_{37}$ Wang, Xin
380 Horvath, loan
271 Vijayakumaran, Vidyasankar
272 Ganesan, Sugumar
284 Smirnis, Nikolaos
${ }_{38}$ Ganesan, Suresh
${ }_{39}$ Sugumar, Sofia Abama
${ }_{40}$ Wang, Shu
41 Selvaraj, Ganeṣh
42 Wang, Zheng Guang
285 Manahil, Naila
43 Elenis, Tony
287 Yu , Wenwu
286 Li, ZhongBin
288 Yu , Li Yun
289 Yu , Wen Bin
${ }_{45}$ Zheng, Linqing
46 Gao, Xiaowen
${ }_{47} \mathrm{Wu}$, Yuling
48 Shi, Xiling
49 Yi , Zheng
${ }_{50} \mathrm{He}$, Zongde
51 Yu , Wenping
${ }_{52} \mathrm{Yu}, \mathrm{Xian}$
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293 Cohen, Sam
294 Behar, Moiz
297 Lin, Guangtai
298 Lin, Xiaozhu
185 Oprea, George
299 Wang, Yuan Liang
300 Lin, Ting
295 Xu, Yue Hua
296 Lin, Hui Fang
317 Tang, Ealex
343 Yang, Sze Tak
344 Hui, Sammy Wing Fu

## 342 Bal, Lill

305 Singh, Balwant
309 Laroia, Pradeep
313 Wang, Yan
291 Gun, Jianfel
314 Mandronis, Peter
315 Mandronis, Christine
264 Vavaroutsos, James
318 He , Xiaobo
322 Xu , Xiaofang
324 He, Qianyun
355 Lee, Josephine
316 Danl, Deepak
326 Oconnell, Phyllis
327 Oconnell, James E
319 Lou, Yu
320 Huang, Qiu-Ping

321 Kang, Zhaoyi
323 Ma , Liang
366 Kwok, Susana
329 Andreopoulos, Dimitri
333 Wang, Amy
334 Wang, Fred
335 Wang. David
336 Wang, Ping Ming-Chu
339 Kennedy, Anna
372 Mirkopoulos, Apkar
331 Alexopoulos, Treandafelos Ake
338 Johnson, Matthew
340 Love, Jon E.
365 Kwok, Walker
371 Koaloussian, Vatche Der
374 Malhotra, Nitin
375 Bekederemo, Pere
376 Ghassemi, Mahdieh Haji
377 Malhotra, Amy
378 Di Donato, Nicola
363 Dominelli, Fred
362 Szeto, Alfred
341 Wong, Kelvin
373 Zhou, RuiZhen
189 Ferrigno-Figliomeni, Marisa
350 Muthulingam, Kandavel
348 lp, Joseph Chi-Tak
351 Alphonse, Krishanthy
349 Emmanuel, Gration
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$\$ 1,000.00 \quad \$ 161,299.44181017$ Oct 17, 2018

360 Yang, Fu Yuan
361 Cheung, Jessica Man Yu
Lui, Alice Shu Ling
367 Yang, Junkun
368 Wang, Xlufang
369 Yang, Shirley
370 Yang, JlansI
56 Kang, Gurpreet Singh
57 Gautam, Neeraj
58 Ghuman, Gurpreet Singh
59 Makore, Gurmukh Singh
60 Virk, Kamapreet Kaur
61 Akhtar, Syed
62 Nijar, Sukhwinder Singh
63 Gill, Jagdeep Singh
64 Gill, Kanwaldip
66 Dhillon, Sukhjinder
67 Virk, Sukhdeu Singh
68 Bindre, Jaspal Singh
69 Basion, Surinder Kaur
$70^{\text {Basion, Ravinder Singh }}$
71 Gill, Tarjinder Singh
72 Bal, Saurabhmeet
73 Gill, Baltej Singh
74 Dhindsa, Parminder
75 Sahota, Santokh Singh
${ }_{76}$ Shoker, Pawandeep Singh
77 Rana, Jaspal Singh
${ }_{78}$ Rai, Kuldip Singh

| $\$ 1,200.00$ | $\$ 162,499.44$ | 181017 | Oct 17, 2018 |
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81 Kang, Harpal Singh
82 Atwal, Kuldip Singh
83 Kaur, Jasvinder
87 Dhillon, Yadwinder
89 Dharmait, Gurpal Singh
${ }_{90}$ Chuhan, Jagtar singh
91 Thiar, Amarvir Singh
92 Banwait, Varinderjit
93 Bains, Rajvir Kaur
94 Bains, Vinod
96 Aujla, Ranjit Singh
97 Gill, Jagtar Singh
99 Dadra, Jasvir Singh
100 Kang, Sukhnandan Kaur
101 Thandi, Bhupinder Singh
102 Gill, Veena
104 Braich, Gurmail Singh
105 Johal, Malwant Singh.
186 Oprea, George
187 Lee, Sai-Kul
188 Emery, Marc
190 MacKinnon, Cameron
192 Shiu, Susan \& Marco
194 Chen, Donald
195 Sidiropoulos, Joseph
196 Downs, Barry
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111 Khinda, Jaspal Singh
113 Kandola, Tarsem Singh
115 Bhullar, Prempreet Singh
116 Sodhi, Yadwinder Singh
117 Singh, Mukhtar
118 Hehar, Amandeep Singh
119 Kandola, Gursham Singh
120 Jugpal, Avtar Singh
121 Singh, Charanjit
122 Thind, Parminder Singh
123 Randhawa, Satinderpal Singh
124 Garcha, Gurwinder Singh
125 Sehdev, Seema
126 Singh, Lachhman
127 Chatha, Darshan
128 Singh, Sukhdev
129 Chatha, Harbans
130 Ral, Balbir Singh
131 Sandhu, Tarsem Singh
132 Singh, Sukhvinder
134 Ghuman, Balwinder Kaur
135 Aulakh, Ranjit Singh
136 Bahia, Balbir Singh
137 Brar, Bhagat Singh
138 Chiku, Harpreet Singh





204 Callaghan, Dave
303 Rotman, Carl 312 Trenton, Micheal
328 Lefebvre, Lynn P
330 Selvaratnam, Sinniah
332 Huynh, Nu-To
346 Boujikian, Anna 354 Ho, Shek Hung Christopher 358 Wong, David 359 Kwan, Tim 379 Selvaratnam, Sinniah 304 Cheong, Denis R
44 Terzian, Vazken
176 Chan, Chor Piu 177 Battiston, Lamberto 179 Wang, Ming-Ming 185 Oprea, George 193 Xlao, Qin 197 Oprea, Sorina 290 Bargenda, Ursula 307. Wu, Xinwu 308 Master, Hilla M 311 Roberts, Edward G 337 Kalsi, Jaswant S 345 Boujikian, Marie 347 Boujikian, Silva 356 Chau, Frank


Campaign Expenses

## What constitutes an expense

For an election campalgn
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).
Section Amendments with date in force ( $\mathrm{d} / \mathrm{m} / \mathrm{y}$ )
2016, c. 15, s. $57(1,3)$ - 09/06/2016; 2016, c. 15, s. 57 (2) - 01/04/2018

## 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.

## DUties of Candidates and Registered Third Parties

## 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;
(0) 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 ( 0 ) 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 $\mathrm{S} 5,000$ to two or more candidates for offices on the same council or local board. 2016, c. $15, \mathrm{~s}$. 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.

1. The Financial Statement (here referred as "the Statement") the candidate filed on March 27, 2019 was incorrect and did not comply with Municipal Elections Act, 1996(Here referred as "the Act"). The statement was incorrect and incomplete as it disclosed no dates of all the contributions. Without such important dates, all the contributions were in doubt if they were the qualified ones in the campaign period.
2. The Statement was filed manually. It was confirmed by Justin Niddrie from Election Services that no pink/hard copies of the receipts of the contributions were submitted at the time of filing, neither were the EFFS contribution list print-outs. It did not comply with the Act, being filed in the prescribed forms. No bank statements were filed to verify every contribution was deposited into the campaign account and to verify the expenses for banking fees or charges.
3. The Statement indicated that there were 381 contributions.
(A) In the EFFS, we can find 339 records with 41 records missing, 1 duplicate. And yet the public do not know all these were filed before the deadline? Were the records simply entered before or after the deadline, but not filed?
(B) At least one count of contribution of goods or service was not valued (See Attachment C1). That was the performance of the llon dancing. The regular charge was $\$ 875$ plus tax. The provider qave a special rate of $\$ 500$ plus tax. The difference should be considered a contribution from the service provider, Sammy Cheng.
(C) Contributor \#226, Chen Shulie's address was incomplete, with no suite \#.
(D) Contributor\#341, Wong Kelvin, and Contributor\#361, Cheung Jessica Man Yu, used a commercial address, 7800 Woodbine Ave, Unit PH, Markham, L3R 2N7 as a mailing address, rather than the residential address. It could not verify that they were Ontario residents. In such a case, the self-employed agents were making the contributions using a personalized business banking cheques, were such contributions qualified one? The quideline did not tell.
(E) There were about 23 households' combined contributions exceeding the personal contribution limit--\$1200. Without the bank statements or copies of their contribution cheques, we cannot verify the contributions come from joint accounts with each one's signature, or from each one's account.
(F) There were 32 contributions of $\$ 100$ or less recorded manually without date of contributions, but only one(contributor\#185, Oprea George) were recorded through EFFS. Another 10
contributions In the total amount of $\$ \mathbf{2 4 0 0}$ were returned and the detalls of the $\mathbf{1 0}$ contributors were not disclosed.
4. The Statement indicated a loan from Scotia Bank, yet disclosed no amount borrowed. However, the statement disclosed unusually high bank charges of about \$5300. Without the bank or visa statement, the expenses were not verifled.
5. The Statement showed that there were two fundraising events, one on 2018/09/09, and the other on Dec 21, 2018. There were no tickets or admissions charged, only expenses. The candidate's guide states that the cost of holding fundraising events or activities is not subject to the spending limit. However, in order to be considered a fundraising cost, the primary purpose for the expense must be related to fundraising rather than promoting the candidate. The 2018/09/09 BBQ event turned out to be the Grand Opening of The Jim Karygiannis Campaign Headquarters (See Attachment P1). The incidental fundraising of the three contributions on the Opening day (See Attachment A/B1-13) is not sufficient to make it a fundraising event. Similarly, a line at the bottom of a campaign brochure asking people to donate does not make the production of the brochure a fundraising expense. Therefore, all the expenses on his Grand Office Opening were subject to general spending limit.
6. There were no expenses of salaries, benefits, honoraria, professional fees incurred until voting day, but $\$ 81,000.00$ expenses after the voting day. No invoices or receipts were provided to verify the nature of the payments as to what kinds of services, or when the services were provided to the campaian. The Act states that the candidate should keep every receipt of every expense. The candidate told David Nickle from Toronto.com, "The honoraria were given to people that helped us transition from the 44 wards to the 25 ward - 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." (See Attachment D1-6). All the works he mentioned were done before the voting day. Therefore these payments were subject to the spending-limit general.
7. The Statement also indicated a payment of $\$ 5000.00$ to a church, Living Stone Assembly, as a victory party expense (sublect to the spending limit), again without the receipt of party expenses to verify how many people attended, where the party was held and when. It might be a payment for the services the church provided to his campaign, subject to the spending limit. If it was a donation, it was not a qualified expense.
8. I restored the candidate's contributions by his team's bookkeeping order'matching the contributions through EFFS (See attachment A1-13). Judging from the order, I believe all the contributions were received before or on the voting day. Only some credit card contributions of $\$ 46,750$ were processed and the funds were received after the voting day.
9. I sorted the contributions through EFFS by date contribution received (See Attachment B1-13). We found that most of the contributions had been processed by Nov. 12, 2018. The last contributions of $\$ 3300$ were received on November 26, 2018. Therefore, there was no need of a fundraising event. The event was a make-up fundraising event on a Friday, December 21, 2018, I belleve. If there was such an event, it was a fund-spending event rather than fund-raising one. There were 2000 copies of invitations/letterheads Fund-raising/promotional envelopes printed. That meant that about 2000 people were invited to Event 2: Santorini Grill where it can accommodate up 160 quests (See Attachment P2-6). Professional fees of $\$ \mathbf{2 1 3 0 0}$ were paid to Campaign Support Ltd and Margot Doey-Vick to plan such an event. Again, there was no ticket or admission charge, only expenses of $\mathbf{\$ 2 7 , 0 8 3 . 5 0}$ on the dinner party. It might be a victory party, but also sublect to the appreciation
party limit. The expense showed no drinks or wine charges. The receipt was even produced at' 10:42 am on the day, before it usually opens at 11:45 am for the "upcoming dinner party" on "a Friday (See Attachment E1). All point to no such an event. That is my suspicion, the public or the audit committee may think differently. The candidate or his agent may give us an explanation.
10. The Act states: the cost of holding fundraising event is a campaign expense. As there were no fundraising events, all his expenses other than the auditing expenses and some office expenses after the voting day were subject to the limits. The candidate Incurred about $\$ 180000$ expenses, much exceeding the spending limits. In the case that there was no 2018-12-21 event, that would constitute a fraud and/or conspiracy. I only raised my concern. The audit committee or the court will Judge it.
11. There were 4 payments outside the campaign period besides the auditing or accounting expenses. These were paid after the campaign ended (See Attachment F1-11). The most notable one was the payment in the amount of $\$ 5311$ on March 20, 2019 to $71 m$ Horton at 4400 Dufferin St, North York, Ontario, M3H 5R9, six months later and six days before his statement filling deadline. The invoice covered the expenses from Sept 9 to Oct 18. It was very odd. The Act states that the candidate should obtain and keep every receipt for every expense. Anyone from his team could have paid for the expense and kept the receipt and got reimbursed from his campaign account. The invoice looked unprofessional. A company such as a Tim Hortons chain store would use their professional accounting software. When you search a customer, using the professional software, it will display sales day by day or item by item, service by service. The Attachment F6 showed the incorrect customer's name, misspelled item and a different issuing date. The contact person's email address would use another domain@andraousgroup.com rather than their domain@TimHortons.com.
12. On June 4, 2019, an elector, Adam Chaleff, filed an Application for Compliance Audit for the same candidate Jim Karyaiannis for the sameFinancial Statement. On July 2, 2019, the application was granted.




4400 Dufferin St North York. Ontario M3H SR

Invoice To:
Jim Karygiannis Campain
11 lvy Bush unit 6
Scarbreugh Onatrio
MTV 2W7

| INVOICE NUMBER | 3 |
| ---: | :--- |
| INVOICE DATE | October 30th 2018 |



THANK YOU FOR YOUR BUSINESS

