



# **Compliance Audit Application by Francis Kung for the Election Campaign Finances of Frances Nunziata**

## **Supplemental material in support of application**

Compliance Audit Committee Meeting  
Item EA4.4  
July 24, 2023

## 1a. Shared event costs



Clearly a campaign event!



Also note the Liban Hassan signs in the background

# 1a. Shared event costs



OFFICE OF THE  
INTEGRITY  
COMMISSIONER  
TORONTO

Interpretation Bulletin  
*Code of Conduct for Members of Council*

## 2022 Municipal Election Requirements

### Purpose

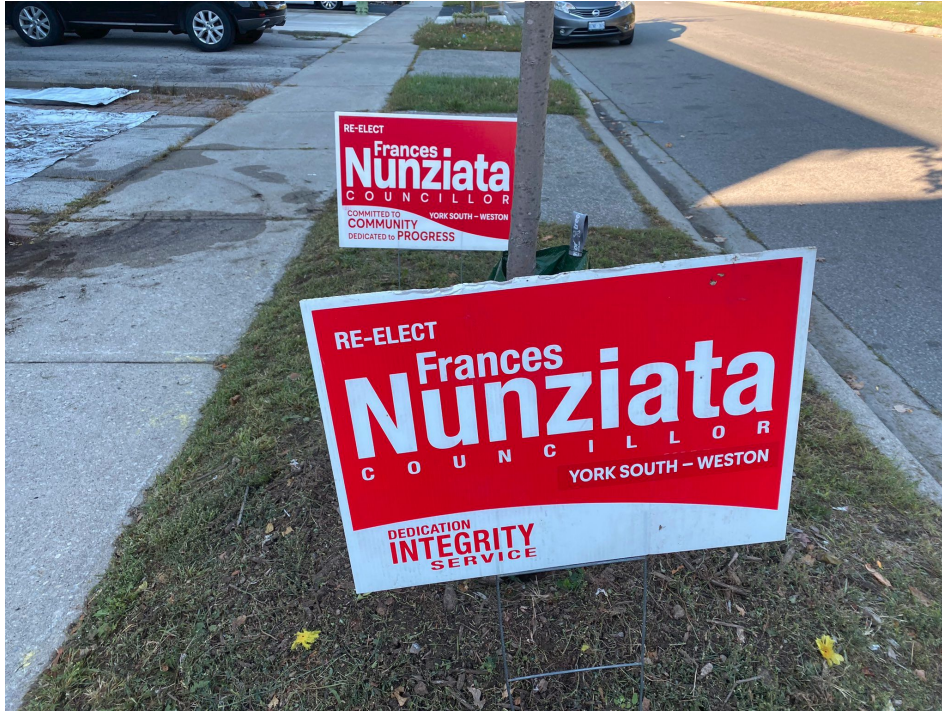
1. This Interpretation Bulletin reminds members of Council ("members") of their obligations under the [Code of Conduct for Members of Council \(the "Code of Conduct"\)](#) and how to separate their work as members from their political activities in the 2022 municipal election.
11. As the Code of Conduct's Preamble advises, members must arrange their private affairs in a manner that promotes public confidence and will bear close public scrutiny. An election year is a time of heightened public scrutiny. Accordingly, members and their staff need to establish a clear separation between their election-related activities and their official duties.
13. Members must not use City resources to support election-related activities whether for their own campaign, the campaign for another candidate or a campaign for a third-party advertiser. A comprehensive set of requirements describe the limits on what their offices can do and what they can spend their office budgets on. These rules are found in:

## 1a. Shared event costs





## 1b. Missing lawn signs on opening inventory



Large (48" x 32") and  
small signs (24" x 16") in opening inventory





## 1b. Missing lawn signs on opening inventory



Medium signs, new in 2022  
(32" x 24")



The full-colour "vertical" signs are missing from the filing.



# 1b. Missing lawn signs on opening inventory

|                                                                                                                                                                                                                                  |                                                       |                         |                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------|-------------------------|---------------------------|
| <b>Signs</b>                                                                                                                                                                                                                     | Small (opening inventory)                             | 600                     |                           |
|                                                                                                                                                                                                                                  | Large (opening inventory)                             | 250                     |                           |
|                                                                                                                                                                                                                                  | Medium (purchased Oct 6)                              | 1000                    |                           |
|                                                                                                                                                                                                                                  | Vertical (missing from filing)                        | 300??                   |                           |
|                                                                                                                                                                                                                                  | <b>TOTAL</b>                                          | <b>2,150</b>            | <b>2,150</b>              |
| <b>Stakes / frames</b>                                                                                                                                                                                                           | Wire frames (opening inventory) 1 frame per sign      | 100                     |                           |
|                                                                                                                                                                                                                                  | Wooden stakes (opening inventory) 2 stakes per sign   | 200 (100 signs)         |                           |
|                                                                                                                                                                                                                                  | Wooden stakes (purchased October 5) 2 stakes per sign | 500 (250 signs)         |                           |
|                                                                                                                                                                                                                                  | <b>TOTAL</b>                                          | <b>450 signs' worth</b> | <b>450 signs' worth</b>   |
| <b>DIFFERENCE</b>                                                                                                                                                                                                                | <b>(MISSING STAKES/FRAMES)</b>                        |                         | <b>1,700 signs' worth</b> |
| <p><b>MISSING:</b> stakes/frames for 1,700 signs: 1,700 frames OR 3,400 wooden stakes (@ roughly \$5 each) – approx \$10-15,000</p> <p><b>MISSING:</b> 300 vertical signs (full colour - perhaps \$10 each?) – approx \$3000</p> |                                                       |                         |                           |

# 1b. Missing lawn signs on opening inventory

## 2022 Candidates' Guide - Ontario municipal council and school board elections

If you have inventory such as signs left over from a previous campaign and you use them again, the current market value of the signs (what it would cost you to buy those signs today) is considered to be a contribution that you make to your campaign.

|                               |                                                      |
|-------------------------------|------------------------------------------------------|
| <b>INVOICE</b>                | <b>HOWARD ADAMS</b>                                  |
| DATE: December 21, 2022       |                                                      |
| TO: Frances Nunziata Campaign |                                                      |
| RE: BALANCE DUE - STAKES      |                                                      |
| <hr/>                         |                                                      |
| Oct 5/22                      | Paid - Pick Up - Delivered - 500 Stakes - \$2,736.84 |

|    | Description   | Date Acquired<br>yyyy/mm/dd | Supplier      | Quantity | Current Market<br>Value \$ |
|----|---------------|-----------------------------|---------------|----------|----------------------------|
| 1. | Small signs   | 2022/05/03                  | 2018 Campaign | 600      | \$ 1,800.00                |
| 2. | Large signs   | 2022/05/03                  | 2018 Campaign | 250      | \$ 1,750.00                |
| 3. | Wire frames   | 2022/05/03                  | 2018 Campaign | 100      | \$ 150.00                  |
| 4. | Wooden stakes | 2022/05/03                  | 2018 Campaign | 200      | \$ 400.00                  |



Should be  $200 \times \$5.47 = \$1094$   
(under-reported by almost \$700)

Current market value: \$5.47 per stake  
( $\$2736.84 / 500$ )



## 2. Fundraising tickets inconsistent with contributions

| Ticket value | Tickets sold | Contributions in June |                                                   |
|--------------|--------------|-----------------------|---------------------------------------------------|
| \$1200       | 14           | 10                    |                                                   |
| \$1000       | 24           | 21                    |                                                   |
| \$750        | 2            | 1                     | <i>only one \$750 donation in entire campaign</i> |
| \$500        | 37           | 34                    |                                                   |
| \$400        | 1            | 1                     |                                                   |
| \$350        | 1            | 1                     |                                                   |
| \$250        | 1            | 1                     |                                                   |
| \$200        | 3            | 3                     |                                                   |
| \$100        | 2            | 1                     | <i>only one \$100 donation in entire campaign</i> |

*\* assuming all contributions from the month of June can be attributed to the event*

## 2. Fundraising tickets inconsistent with contributions

### Attachment 7

Speducci Mercato Inc  
46 Milford Ave  
North York ON M6M 2V8  
416-242-2777  
aisha@speducci.com  
GST/HST Registration No.:  
822596177RT0001  
Business Number 822596177RT0001



#### INVOICE

##### BILL TO

Frances Nunziata  
Frances Nunziata Campaign  
2221 Keele St  
Unit 102  
Toronto Ontario M6M 3Z5

##### SHIP TO

Frances Nunziata  
Frances Nunziata Campaign  
2221 Keele St  
Unit 102  
Toronto Ontario M6M 3Z5

INVOICE # 153607

DATE 22/06/2022

DUE DATE 29/06/2022

TERMS Terms

| DATE | DESCRIPTION           | QTY | RATE     | TAX    | AMOUNT   |
|------|-----------------------|-----|----------|--------|----------|
|      | Food and Beverage     | 1   | 9,080.00 | HST ON | 9,080.00 |
|      | Rental of Event Space | 1   | 500.00   | HST ON | 500.00   |

### 3. Shared trustee costs

Liban Hassan's financial filing (excerpt - Expenses section only)

**EXPENSES** (Note: include the value of contributions of goods and services)

**1. Expenses subject to general spending limit**

Inventory from previous campaign used in this campaign  
(list details in Table 2 of Schedule 1)

+ \$0.00

Advertising

+ \$0.00

Brochures/flyers

+ \$2,500.00

Signs (including sign deposit)

+ \$5,000.00

Meetings hosted

+ \$0.00

Office expenses incurred until voting day

+ \$1,000.00

Phone and/or internet expenses incurred until voting day

+ \$0.00

Salaries, benefits, honoraria, professional fees incurred until voting day

+ \$0.00

Bank charges incurred until voting day

+ \$0.00

Interest charged on loan until voting day

+ \$0.00

Other (provide full details)

+ \$0.00

+ \$0.00

+ \$0.00

+ \$0.00

**Total Expenses subject to general spending limit**

= **\$8,500.00** C2



### 3. Shared trustee costs



**John Tory**  
@JohnTory

Had a wonderful time in York South—Weston with Frances Nunziata and @VoteLibanHassan this morning. It was such a pleasure to meet those who call the residence home and thank staff for their dedicated work serving Torontonians.



12:16 PM · Oct 21, 2022



**Liban Hassan** @LibanHassan\_ · Oct 19, 2022

I am delighted to announce that I am being endorsed by @JohnTory and @FrancesNunziata for TDSB Trustee in #ysw

I urge everyone in #ysw to vote for all 3 of us on October 24th! #TOPoli #onpoli

The ballot numbers are:

29 - John Tory  
50 - Frances Nunziata  
103 - Liban Hassan



and Frances Nunziata

### 3. Shared trustee costs



[Home](#) > [Home and community](#) > [Municipalities and communities](#)  
> [2022 Candidates' Guide - Ontario municipal council and school board elections](#)

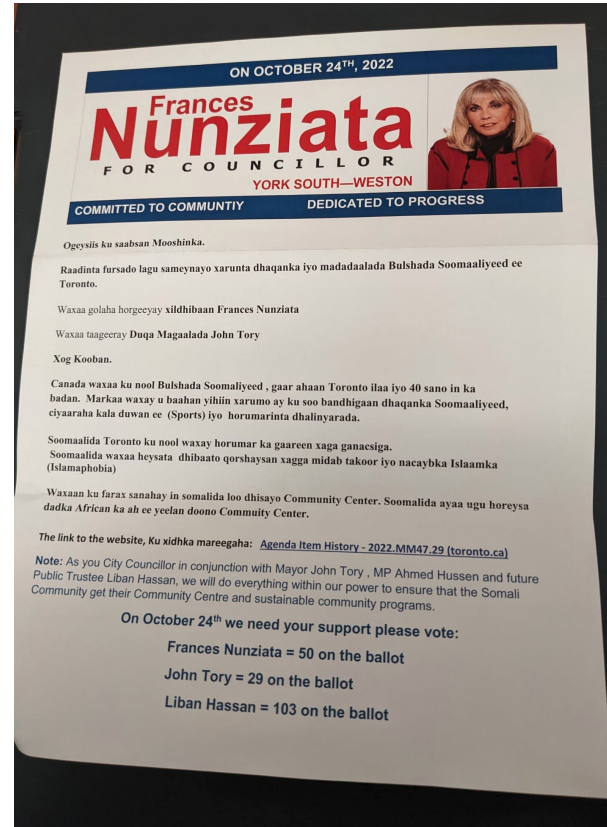
## Joint campaigns / running on a slate

There is nothing in the [Municipal Elections Act, 1996](#) that would prevent like-minded candidates from campaigning on the same platform or identifying themselves as a group or slate. However, each candidate must keep their campaign finances separate and any joint expenses (for example, signs with two candidates' names on them) must be divided between the campaigns.

### 3. Shared trustee costs



Same flyer – double sided.



Cost should be split 50/50.

### 3. Shared trustee costs

**Trustee - Liban Hassan**  
**Councillor - Frances Nunziata**  
**Mayor - John Tory**

**TORONTO**  
Municipal Election  
October 24, 2022

**How to Vote**  
Candidate A ☐  
Candidate B ☒  
Candidate C ☐  
Fill in the oval to the right of the candidate of your choice, using only a black or blue pen.

**Etobicoke North**  
**P**  
Any Format is Fine

| MAYOR<br>Vote for ONE (1) candidate only |                                       | COUNCILLOR<br>Vote for ONE (1) candidate only |                                           | TRUSTEE<br>Ward 6<br>Toronto District School Board<br>Vote for ONE (1) candidate only |                                         |
|------------------------------------------|---------------------------------------|-----------------------------------------------|-------------------------------------------|---------------------------------------------------------------------------------------|-----------------------------------------|
| 21                                       | <input type="radio"/>                 | 50 Frances                                    | Nunziata <input checked="" type="radio"/> | 100                                                                                   | <input type="radio"/>                   |
| 22                                       | <input type="radio"/>                 | 51                                            |                                           | 101                                                                                   | <input type="radio"/>                   |
| 23                                       | <input type="radio"/>                 | 52                                            |                                           | 102                                                                                   | <input type="radio"/>                   |
| 24                                       | <input type="radio"/>                 | 53                                            |                                           | 103 Liban                                                                             | Hassan <input checked="" type="radio"/> |
| 25                                       | <input type="radio"/>                 | 54                                            |                                           | 104                                                                                   | <input type="radio"/>                   |
| 26                                       | <input type="radio"/>                 | 55                                            |                                           | 105                                                                                   | <input type="radio"/>                   |
| 27                                       | <input type="radio"/>                 | 56                                            |                                           | 106                                                                                   | <input type="radio"/>                   |
| 28                                       | <input type="radio"/>                 | 57                                            |                                           | 107                                                                                   | <input type="radio"/>                   |
| 29 John                                  | Tory <input checked="" type="radio"/> | 58                                            |                                           | 108                                                                                   | <input type="radio"/>                   |
| 30                                       | <input type="radio"/>                 | 59                                            |                                           | 109                                                                                   | <input type="radio"/>                   |

Single-sided, not folded.

Does not match the invoice provided.

Who printed and paid for these?

Was the expense recorded properly?