

September 24, 2024

TO: Compliance & Audit Committee, City of Toronto

RE: BDO Galifi Audit regarding Section 88.9 of Municipal Elections Act, 1996

Dear Chair,

My name is Jeffrey Kroeker, I am the CFO to Mark Saunders' campaign. I am also the legal representative of **Mr. Christopher (Chris) Galifi and of Ms. Cristina Galifi**, who are two distinct individuals and who reside together as husband and wife.

The 2023 byelection for the Mayor of Toronto was conducted on June 26, 2023, and prior to that date, there was a campaign for said position where campaign contribution were solicited from a number of candidates who stood for election at that time. During the campaign period, Mr. Chris and Ms. Cristina Galifi, husband and wife, each contributed individually to campaign of Mr. Saunders for Mayor of Toronto up to their statutory limit of \$2,500.00.

Section 88.9 of the *Municipal Elections Act, 1996*, establishes that individual donors are limited to \$2,500 of contribution to a specific candidate (and \$5,000 in the aggregate to all campaigns) during an election period for the Mayor of Toronto. In accordance with the Act, under Section 88.34, the Clerk tasked BDO Canada LLP to review donations and report back on individual donors who potentially exceeded their legal limits. In the case of Mr. Chris Galifi and Ms. Cristina Galifi, the BDO Canada LLP has erroneously identified as a potential single contributor, when in fact, they are two distinct persons.

For the Committee's consideration, I attach two redacted¹ images of the Driver's Licences for each of Mr. Chris Galifi and Ms. Cristina Galifi as **EXHIBIT A**. On its face, it is clear the individuals are two distinct persons. It is therefore respectfully submitted that neither Mr. Chris Galifi nor Ms. Cristina Galifi should have any action taken against them nor have they contravened the *Municipal Elections Act, 1996*.

Should the committee have any further questions, I would be pleased to respond accordingly and intend to appear virtually before the Committee on Wednesday September 25, 2024.

With regards,

Jeffrey J. Kroeker, BA (Hons.), JD
Partner, jkroeker@masseylaw.ca

¹ The redaction removes visible versions of any information that could be used for the purposes of obtain credit (i.e. birthday and/or signatures) and other information not necessary to determine that the two individuals are in fact two distinct persons.