



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 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	
Lechter		Deborah	
Address (qualifying address in the City of Toronto)	Unit	City	Postal Code
102 Sheldrake Blvd		Toronto	M4P2B5
Mailing Address (if different than qualifying address)	Unit	City	Postal Code
Home Phone	Business Phone	Cell Phone	
		416-825-5410	
Email			
debbie@poochypawz.com			

Candidate/Registered Third Party Advertiser Details

Individual Last Name or Single Name		First Name	
Organization Name (if corporation or trade union)			
Progress Toronto			
Registered for (check box that applies) <input type="checkbox"/> Mayor <input type="checkbox"/> Councillor <input checked="" 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)			
<p>Progress Toronto violated multiple financial and third party rules. There are four serious violations including:</p> <p>1) campaigning for a candidate</p> <p>2) incurring expenses prior to registration</p> <p>3) Not declaring value for services received</p> <p>4) Accepting donations from a Union</p> <p>1) Third Parties are prohibited from campaigning for a candidate. This is most serious as it dramatically changes a level playing field and gives an unacceptable advantage to one candidate. The consequences are which. The candidate must include Progress Toronto expenses in her expenses, as they were incurred to get her elected. The inclusion of these expenses puts the candidate over the limit. The penalty is removal from office.</p> <p>2) No expenses can be incurred prior to registration. Penalty is</p> <p>3) When the "in-kind" services are valued and included as expenses, Progress Toronto is substantially over the limit. The overages also precipitate the need for an audited return.</p> <p>4) Unions cannot donate to a campaign unless the UNION is registered as a third party. They were not registered. The donation was the largest single donation in the third party campaign and changed the nature of the campaign through the use of illegal funds.</p> <p>There are a significant number of violations including not reporting properly and not disclosing details to the level of where the public can understand the finances. This is a requirement. Several other violations are outlined in the attached.</p> <p>This complaint requests a forensic audit be authorized by the Committee and conducted within the strict time frames of the Municipal Elections Act.</p> <p>This complaint also seeks penalties be applied for campaigning for a candidate, campaigning before registering and accepting illegal donations as well as all penalties per the violations outlined in the attached.</p> <p>The violation constitute corrupt practices and are an offence under the Act.</p>			
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)	
Debbie Lechter		2/4/2025	

Filing

Received By	Date Received (yyyy-mm-dd)
Kathleen Donovan	2025-02-04

The personal information on this form is collected under the authority of the Municipal Elections Act, S.O. 1996, Chp. 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 (TMMIS) 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.

VIOLATIONS

1. Expenses and campaigning occurred before registration

Third-party advertisements

88.4 (1) No individual, corporation or trade union shall incur expenses for a third-party advertisement that appears during the restricted period for third-party advertisements unless the individual, corporation or trade union is a registered third-party under section 88.6 when the expenses are incurred and when the advertisement appears. 2016, c. 15, s. 48.

Restricted period for third-party advertisements

(2) The restricted period for third-party advertisements in relation to an election in a municipality begins on the earliest day that an individual, corporation or trade union is permitted to file a notice of registration as a registered third-party in relation to the election and ends at the close of voting on voting day. 2016, c. 15, s. 48.

Progress Toronto (PT) registered on **October 8, 2024**, as evidenced in the attached copy of the registration. (Exhibit 1)

Campaigning, including flyers and PT staff and volunteers, started in September. Expenses incurred for flyers, door to door costs, salaries for PT staff were all a violation of the Municipal Elections Act (MEA). (Exhibit 2a,b,c)

2. Contributions in kind received before registration

Contributions to registered third parties

88.12 (1) A contribution shall not be made to or accepted by an individual, corporation or trade union in relation to third-party advertisements that appear during an election in a municipality, or made to or accepted by an individual acting under his, her or its direction, unless the individual, corporation or trade union is a registered third-party in relation to the election in the municipality. 2016, c. 15, s. 52.

Only during campaign period

(2) A contribution shall not be made to a registered third-party, or to an individual acting under his, her or its direction, if the contribution is made outside the campaign period described in section 88.28 for the registered third-party in relation to an election in the municipality. 2016, c. 15, s. 52.

Staff and volunteers campaigned with flyers before registration. Both staff hours spent campaigning and training and seeking volunteers starting in early September. All of these services are donations in kind.

Printing flyers, even printing in-house incurs an expense which is a donation in kind from Progress Toronto. Flyers were printed in September as seen in photos and as stated on the website. **This is not permitted outside of the campaign period** which in this case started October 8, 2024, which is the date of the certified registration. (Exhibit 2a,2b,2c)

This triggered a violation of accepting a donation in-kind prior to registration. Contributions whether donations or in-kind contributions cannot be accepted prior to registration.

3. A bank account must be opened exclusively for the campaign. All expenses must be paid from the account and all donations deposited to the account.

a. Duties of registered third parties

88.26 (1) A registered third-party shall ensure that,

(a) no contributions of money are accepted or expenses are incurred in relation to third-party advertisements that appear during an election in a municipality 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 registered third-party 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 registered third-party 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 88.29 and 88.32; and

(n) proper direction is given to the persons who are authorized to incur expenses and accept or solicit contributions under the direction of the registered third-party.

Exhibit 2a,2b,2c, 4a, 4b,4c,5. All demonstrate staff canvassing before Progress Toronto registered. These are at a minimum, donations in kind and also any expense incurred were not reported or paid from the campaign expense account.

Exhibit 2c specifically states “we will give you support and training,..” for the canvassing on Oct 1. That was before Oct 8 registration. The canvassing was under the direction of Progress Toronto staff.

It was not inadvertent as the exhibit 2a,2b, 2c demonstrates and staff donations have not been included in expenses nor reported as donations.

4. Advertising after voting day

Progress Toronto continued to advertise after voting day which is expressly prohibited.

88.4 (1) No individual, corporation or trade union shall incur expenses for a third-party advertisement that appears during the restricted period for third-party advertisements unless the individual, corporation or trade union is a registered third-party under section 88.6 when the expenses are incurred and when the advertisement appears. 2016, c. 15, s. 48.

Restricted period for third-party advertisements

(2) **The restricted period for third-party advertisements in relation to an election in a municipality begins on the earliest day that an individual, corporation or trade union is permitted to file a notice of registration as a registered third-party in relation to the election and ends at the close of voting on voting day.** 2016, c. 15, s. 48.

The advertisements continued by way of notices and ads that ran promoted Progress Toronto as meeting their goal of defeating Anthony Furey and getting their candidate, **Rachel Chernos-Lin**, elected. These were after election day and are violations.

This advertising of their message violates s.88.4 (2) as the advertising was after voting day. (Exhibit 3)

5. Bank account must be opened before donations are received and expenses can only be paid from the bank account.

- The first donation was received on October 10, 2024, according to the disclosed donation list.
- Expenses were incurred and paid outside of the bank account. Exhibit 2a,2b,2c, 4a, 4b,4c,5.

6. No loan reported

- Expenses exceeded the amount in the bank account as the first donation was received October 10, 2024.
- Expenses incurred before that were illegally paid; an undisclosed loan is a violation.

7. Donations not reported

The Act is specific that donations over \$25 must be reported with contributor's name and account.

a. Contributions exceeding \$25

(8) A contribution of money that exceeds \$25 shall not be contributed in the form of cash and shall be contributed in a manner that associates the **contributor's name and account with the payment or by a money order signed by the contributor**. 2016, c. 15, s. 52.

- It is puzzling why the City of Toronto form requires donations over \$100 be listed when the MEA states all donations over \$25 must be recorded and receipts issued.
- In any event, donations over \$25 are not reported and must be disclosed.

8. Fundraiser expenses not reported properly

Contributions

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

1. An amount charged for admission to a fund-raising function.

2. If goods and services are sold for more than their market value at a fund-raising function, the difference between the amount paid and the market value. However, if the amount received for the goods or services is \$25 or less, the amount is not a contribution.

3. If goods and services used in the person's election campaign or in relation to third-party advertisements are purchased for less than their market value, the difference between the market value and the amount paid.

4. Any unpaid but guaranteed balance in respect of a loan under section 88.17. 2016, c. 15, s. 53 (3).

- Expenses for the fundraiser and donations raised are reported as lump sums only. **The Act is specific that donations at a fundraiser must be detailed to provide the donation less the cost of the fundraiser.**
- The expenses for the fundraiser were not reported.
- There is a bank fee of \$437.93 reported for the funds submitted electronically however no expense reported for the fundraiser itself. This is an unreported expense which is a violation and there is an assumed second violation with the expenses for the fundraiser not being allocated to individual donations.
- A lump sum donation of \$8228 less the cost of bank charges of \$437.93. **This lump sum is reported is reported without any details of the actual donations, less the cost of the fundraiser.**
- The fundraiser was reported to raise \$7,078. **This amount does not reconcile with the reported funds donated of \$8228 less \$437.93 bank fees.**
- Fundraiser expenses must be allocated to each donor and the amount of the donation disclosed as a NET of the donation less the cost for all donations exceeding \$25.
- That has not been done and that indicates **two** violations have occurred.

9. Illegal donations: Unions cannot donate to a third-party unless the UNION is a Registered Third-party

Contributions to registered third parties

88.12 (1) A contribution shall not be made to or accepted by an individual, corporation or trade union in relation to third-party advertisements that appear during an election in a municipality, or made to or accepted by an individual acting under his, her or its direction,

unless the individual, corporation or **trade union is a registered third-party in relation to the election in the municipality**. 2016, c. 15, s. 52.

Who cannot contribute

(4) For greater certainty, and without limiting the generality of subsection (3), the following persons and entities shall not make a contribution:

1. A federal political party registered under the *Canada Elections Act* (Canada) or any federal constituency association or registered candidate at a federal election endorsed by that party.
2. A provincial political party, constituency association, registered candidate or leadership contestant registered under the *Election Finances Act*.
3. A corporation that carries on business in Ontario.

4. A trade union that holds bargaining rights for employees in Ontario.

5. The Crown in right of Canada or Ontario, a municipality or a local board. 2016, c. 15, s. 51

- Progress Toronto was a registered third-party. However, Union UA Local 46 was NOT registered as a third-party in the by-election.
- The donation of \$1,000 from Union UA Local 46(a trade union that holds bargaining rights for employees in Ontario) is an illegal donation and must be returned and penalties for accepting an illegal donation applied. The Clerk should identify this according to the procedures for election finances on the City's website as "on the surface" it is an illegal violation.

10. The donations listed as being received and date received doesn't meet the date the expenses were incurred

- The list of expenses paid far exceeds the donations received by the date the expenses were incurred.
- Donations were received from five (5) individuals in the amount of \$1,150 starting October 10, 2024 and ending October 21, 2024.
- There was one union donation in the amount of \$1,000 received November 19, 2024, which must be returned given it was not a permitted donation.

- The fundraiser was held on December 19, 2024, and reportedly raised \$7078. Expenses are only permitted to incur during the campaign period, except for the exempt items.
- **The majority of the donations came on December 19, 2024**, when the fundraiser was held.
- Expenses were incurred during the campaign such as flyers, salaries, advertising, digital advertising, volunteer training, door-to-door campaigning and expenses, office expenses, internet, and phone. **These were incurred with donations of only \$1,150. No expense can be paid outside of the bank account unless it is a *loan* and there are no loans reported.**
- There is a clear indication that Progress Toronto was paying expenses from general revenues, which is certainly the case for expenses incurred prior to registration and would account for the expenses incurred during the campaign and paid for outside of the campaign.
- It certainly is the case for office expenses and salaries and photocopying and use of premises and use of facilities for training for volunteers, printing flyers, meetings, and staff from Progress Toronto actively campaigning before the registration date. Exhibit 2a,2b,2c, 4a, 4b,4c,5.
- **Sources of revenue for Progress Toronto must be disclosed** for all expenses incurred outside of the campaign period and outside of donations that were **legitimately** received and accepted outside of the bank account
- ***Progress Toronto cannot use revenue from other sources*** and every campaign is stand alone. No money can be used from previous campaigns or general revenues.
- **One separate bank account must be used and only used. For all donations and expenses**
- Donations must be accounted for, and all expenses must be paid for through a separate bank account.
- As Progress Toronto is a corporation, and can run a third-party campaign, all services have to be valued and included. No expenses were reported such as use of facilities, photocopying machine, rent, staff, parking, phones, website, and board rooms, meetings and training

These are all violations.

11. Salaries not reported

The three paid staff of Progress Toronto's salaries have not been disclosed or included in the expenses nor were they reported as gifts in kind.

They actively campaigned for three (3) months, starting when the first request for volunteers was posted in September 2024, prior to registering October 10, 2024, and continued to work on the campaign up to and including the fundraiser on December 19, 2024. Their contributions, whether gifts in kind or unreported salaries, were both outside the campaign period for the third-party and an undisclosed expense. (Exhibit 2a,2b,2c, 4a, 4b,4c,5.)

The Executive Director of PT has been a candidate and therefore has direct knowledge of the MEA. (Exhibit 6). These violations are not inadvertent

At minimum wage, for the time period the three staff worked on the third-party campaign, the unreported salaries are a minimum of \$8200.

This amount is unreported, which is a violation. (Exhibit 2a,2b,2c, 4a, 4b,4c,5.)

12. Unaudited return

Auditor

(5) An auditor's report shall be prepared by an auditor licensed under the *Public Accounting Act, 2004*. 2016, c. 15, s. 61.

Exception re auditor's report

(6) No auditor's report is required if the total contributions received and total expenses incurred in the registered third-party's campaign in relation to third-party advertisements during an election in the municipality up to the end of the relevant period are **each equal to or less than \$10,000**. 2016, c. 15, s. 61.

Any campaign that has expenses that exceed \$10,000 must file an audited return.

- Donations of \$9228 are reported and no donations in-kind have been reported.
- The **donations in-kind**, which include the staff salaries, use of facilities, photocopying charges above the hard costs, training, and so forth, exceed \$778, thereby triggering a required audited financial return.
- Also, there are substantial **unreported expenses**, and these exceed the difference between the reported expenses of \$9228.71 and the \$10,000 requirement for an audit,

is \$771.29. The unreported expenses such as fair market value for the office, photocopying charges, staff, website, and so forth exceed \$771.29 and this also indicates an audited financial return should have been filed instead of an unaudited return.

- Unreported expenses are a serious violation of the Municipal Elections Act.
- Saman Tabasinejad signed the third-party application and on the application itself it outlines not reporting expenses is a violation. (Exhibit 1)
- Saman Tabasinejad signed the financial submission and as such is the responsible authority. (Exhibit 6)
- Saman Tabasinejad was previously a candidate in a Municipal Election in Toronto. She has knowledge of the Municipal Elections Act and as such, these violations cannot be considered to be inadvertent. (Exhibit 6)

An audit return was required and was due on January 20, which is a violation.

13. Endorsing one candidate

- PT endorsed one candidate, and that candidate was **Rachel Chernos-Lin**. (Exhibit 7a, 7b)
- A third-party cannot be a candidate or contribute to a candidate's campaign.
- Progress Toronto contributed to the campaign of Chernos-Lin by delivering flyers that supported her and by delivering flyers and posting on their website attacks against the candidate who was her main competitor.
- Progress Toronto endorsed candidate Chernos-Lin, advertised her name, and promoted voting for her.
- They produced, delivered and promoted a flyer endorsing her, produced digital advertising, put the endorsement on their website.
- All of these promotions are advertising and therefore both contributions and expenses.
- Third parties CANNOT make contributions to candidate campaigns and all expenses for a candidate MUST be declared by the candidate.
- This both a prohibited Act that disqualifies Progress Toronto as a third-party and all expenses incurred must be declared and included by the candidate as expenses.

- There are thousands of dollars in expenses that must be included by Chernos-Lin on her financial statement.
- Chernos-Lin spent a total of \$61,000.02 (Exhibit 8)

14. Eligibility for Registration

88.6 Eligibility for registration

(4) Only the following persons and entities are eligible to file a notice of registration:

1. An individual who is normally resident in Ontario.
2. A corporation that carries on business in Ontario.
3. A trade union that holds bargaining rights for employees in Ontario. 2016, c. 15, s. 49.

Restriction

(5) The following persons and entities are **not eligible to file a notice of registration**:

1. A candidate whose nomination has been filed under section 33.

2. A federal political party registered under the *Canada Elections Act* (Canada) or any federal constituency association or registered candidate at a federal election endorsed by that party.
3. A provincial political party, constituency association, registered candidate or leadership contestant registered under the *Election Finances Act*.
4. The Crown in right of Canada or Ontario, a municipality or local board. 2016, c. 15, s. 49.

15. Contributions to candidates

88.8 (1) A contribution shall not be made to or accepted by a person or an individual acting under the person's direction unless the person is a candidate. 2016, c. 15, s. 51.

Who may contribute

(3) Only the following persons may make contributions:

1. An individual who is normally resident in Ontario.
2. Subject to subsection (5), the candidate and his or her spouse. 2016, c. 15, s. 51.

Who cannot contribute

(4) For greater certainty, and without limiting the generality of subsection (3), the following persons and entities shall not make a contribution:

1. A federal political party registered under the *Canada Elections Act* (Canada) or any federal constituency association or registered candidate at a federal election endorsed by that party.
2. A provincial political party, constituency association, registered candidate or leadership contestant registered under the *Election Finances Act*.

3. A corporation that carries on business in Ontario.

4. A trade union that holds bargaining rights for employees in Ontario.

5. The Crown in right of Canada or Ontario, a municipality or a local board. 2016, c. 15, s. 51.

88.5 For third-party advertisements

(2) For the purposes of this Act, money, goods and services given to and accepted by an individual, corporation or trade union in relation to third-party advertisements, or given to and accepted by another person who is acting under the direction of the individual, corporation or trade union, are contributions. 2016, c. 15, s. 53 (2).

Value of goods and services

(5) The value of goods and services provided as a contribution is,

(a) if the contributor is in the business of supplying these goods and services, the lowest amount the contributor charges the general public in the same market area for similar goods and services provided at or about the same time;

(b) if the contributor is not in the business of supplying these goods and services, the lowest amount a business providing similar goods or services charges the general public for them in the same market area at or about the same time. 2016, c.

- There was no indication that Progress Toronto considered any other candidates. There were no requests for candidates to respond to questions or criteria for all candidates to respond to.
- Endorsing one candidate and actively advertising for the candidate is both prohibited and means the expenses have to be reported by and included in the candidate's expenses.
- The expenses incurred by Progress Toronto must be included in the candidate's expenses. This means that the candidate overspent and removal from office is the penalty. (Exhibit 8)
- The compliance audit against Ms Lin is included in this application, as if the expenses of Progress Toronto are deemed to be resulting from directly advertising for Ms Lin, the expenses must be included in Ms Lin's expenses.

16. Expenses not declared

The limit for third part spending was outlined by the city clerk in the response to the registration. (Exhibit 1) That amount is \$ 8,702.60.

When the unreported amounts are included, Progress Toronto overspent by thousands of dollars, a substantial amount.

Overspending is a serious violation.

17. Office expenses not disclosed or included

- Office expenses are under-valued. Rent for the use of PT's office must be included on a market value level.
- The expenses declared are \$1,214.22 which values the office at \$404.74 per month which is significantly below market value. The full market value must be included from September when the campaigning and canvassing started until December 19 when the campaign ended. (as stated in the financial form submitted)

18. PT disclosed that their flyers were photocopied.

- There are no photocopy expenses. There were tens of thousands of flyers, laser printed in-house at a cost of \$.05 per flyer (<https://www.tonerbuzz.com/blog/printing-costs>) (paper plus photocopying charges plus unreported "in kind" goods and services).

- The approximate unreported costs exceed \$1,000. These costs must be quantified and included as unreported expenses.

19. Digital advertising under valued

- Expenses for digital advertising to an audience of 109,000 people was not declared at market value.
- The advertising cost reported was \$4,853.78 and may not be reported at market value.
- **Disclosure is required.**

20. Website not declared as an expense

- The website for PT was used to seek volunteers, promote door to door campaigning, promote meeting, promote training sessions
- The cost of the Website and maintaining the website must be included. It is noted that many of the entries have been deleted since the end of the campaign. A posting on X by staff indicated they “always remove” campaign picture, when a campaign is completed.
- The posting and deletion of posts was done with purpose and admittedly staff knew they were deleting and posting for what they claim is a “separate campaign” yet, finances were not separate, and Progress Toronto resources were not separated.
- The cost of communication with staff, and volunteers was not declared. Were cell phones used and are these phones reimbursed by Progress Toronto on a regular basis? If so, the cost of phones was not declared.

21. The cost of door-to-door canvassing was not declared

- The expenses for door- to-door canvassing were not reported for the campaign. None of the materials used to canvass were reported as expenses. This included canvass bags, flyers, buttons, clip boards, refreshments, training, meetings and all services and materials used to canvass.

22. Over-contributions

- Progress Toronto is a corporation and did not declare value of services provided. The services are greater than \$1200 and represent an over contributed to the campaign.
- Under reported expenses are services not valued and included.

23. False and misleading information

- **89 (h) furnishes false or misleading information to a person whom this Act authorizes to obtain information;**

The attached document is full of falsehoods and defamatory content. (Exhibit 9a,9b,9c)

24. Penalties and violation under the Act

Exhibit 10 is an outline of potential penalties stated in the Act that could apply to the violations

25. Filed financial report

Exhibit 11 is a copy of the financial report provided for your convenience.

EXHIBITS

Exhibit 1	Progress Toronto Notice of Registration
Exhibit 2	September 20 through Oct 1 Progress Toronto Staff Canvassing
Exhibit 3	Advertising after election day
Exhibit 4	Numbers of Flyers, Digital Ads and Reach of Progress Toronto campaign
Exhibit 5	Progress Toronto begins campaigning in DVW before October 10
Exhibit 6	Staff (and Board)campaigning and unreported expenses/donations n kind
Exhibit 7	Progress Toronto supported Rachel Chernos-Lin
Exhibit 8	Rachel Chernos-Lin finances
Exhibit 9	False and misleading information about Anthony Furey
Exhibit 10	Evidence of knowledge of MEA
Exhibit 11	Copy of financial statement submission

EXHIBIT 1



ORIGINAL

Notice of Registration - Third Party

This Notice must be filed in person or by an agent at:

- Toronto Elections, City Hall, 100 Queen Street West, 1st Floor west (permit alley)

This Notice cannot be filed by email or fax. It is the responsibility of the person incurring expenses to file a complete and accurate notice.

Box A: Notice of Registration (individuals, corporations and trade unions)

Name of Individual (Last, First), Corporation or Trade Union (Registrant) Progress Toronto			
Mailing Address of Registrant 401 Richmond St W	Unit 436	City Toronto	Postal Code M5V 3A8
Telephone Number 416-583-5265		Alternate Telephone Number	
Email info@progresstoronto.ca			

Box B: Designation of an Official Representative (corporations and trade unions)

Name of Person Signing (Official Representative)			
Last Name Tabasi Nejad		First Name Saman	
<input type="checkbox"/> Check this box if Last Name and First Name do not apply to you because you have either a registered Birth Certificate or Change of Name Certificate bearing a Single Name.			
Single Name (only applicable if the criteria described above is met)			
Mailing Address of Official Representative 785 Dupont St	Unit	City Toronto	Postal Code M6G 1Z5
Telephone Number 4168856548		Alternate Telephone Number	
Email saman@progresstoronto.ca			

Box C: Additional Information (corporations)

Business Name Progress Toronto		Ontario Corporation Number 1066652-1
Names of Principal Officers		
Amina Jabbar	Don Eady	Esther Lexchin

☐ Additional names are listed on separate supplementary attachment

Box D: Declaration of Qualification

I, <u>Saman Tabasi Nejad</u> , the Registrant (or Official Representative of the Registrant), referred to in this notice, do hereby declare that:			
<ul style="list-style-type: none"> The information in this notice of registration is, to the best of knowledge and belief, true; The Registrant is qualified to be registered as a third party advertiser; and I am authorized to sign on behalf of the Registrant (applies only in the case the Registrant is a corporation or trade union). 			
Signature of Registrant or Official Representative 		Date (yyyy-mm-dd) 2024-10-08	
Date Filed (yyyy-mm-dd) 2024-10-08	Time Filed 3:39	Initial of Registrant or Official Representative STW	Signature of City Clerk or Designate

Certification by City Clerk or Designate

I, the undersigned clerk of this municipality, do hereby certify that I have examined the notice of registration of the aforesaid registrant filed with me and am satisfied that the registrant is qualified to incur expenses and that the notice of registration complies with the Act.	
Signature of City Clerk or Designate 	Date Certified (yyyy-mm-dd) 2024-10-08

Exhibit 2a through 2d



Knock on Doors in Don Valley West

Sep 20, 2024



Knock on Doors in Don Valley West

Sep 20, 2024

Upcoming Events:

Knock on Doors

Tuesday, October 1st - 6pm

[Eglinton Station](#) (Yonge St & Eglinton Ave)

Never canvassed before? Don't worry! **We will give you support, training, and pair you with an experienced volunteer.** Canvassing at events is a fun way to get out in the community and talk to people about issues that matter to them.

Will you join us? RSVP using this form.

Accessibility Information

If you have any access needs, please let us know at the bottom of the sign up form. Access needs are defined as anything a person may need to communicate, learn, and take part in an activity.

Canvassing may be inaccessible for some as it requires speaking to the public and walking for multiple hours, however you are welcome to join for as long as you like.

We are implementing disability justice in our framework and are constantly learning and growing. If you have any questions, suggestions, or need any further information, please reach out to us at volunteer@progresstoronto.ca.



Volunteer: Deliver Flyers in Don Valley West

Oct 10, 2024



Far-right candidate Anthony Furey is defeated in Don Valley West by-election

Together we defeated far-right candidate Anthony Furey in the Don Valley West by-election held on November 4 2024! Conservatives thought they could elect Furey on his name recognition alone and keep his harmful record secret, but we didn't let that happen.

We crunched the numbers: before we launched our campaign to stop Furey, polls showed he was ahead by over 10%. **On election night, Furey lost by over 23% to former local TDSB Trustee Rachel Chernos Lin. Our collective work helped shape this election.**

Here are some highlights from our campaign made possible by our supporters and volunteers:

- 22,000+ households reached by flyers
- 483 hours volunteered
- 109,000+ people reached in Don Valley West through digital ads
- 38 outreach events in every corner of the ward
- \$8,700 fundraising goal met thanks to generous donors

EXHIBIT 4 a through c



[ABOUT US](#) [UPDATES](#) [VOLUNTEER](#) [CONTACT US](#) [DONATE](#)



Our Team

Progress Toronto has an exciting team of Staff, Board Members, and Advisors who have come together from across Toronto to build a more progressive city. Scroll down to see our team and click on individual photos to read bios and learn more about their work.

- [Staff Team](#)
- [Board of Directors](#)
- [Advisors](#)

Staff Team



Donovan Hayden



Saman Tabasinejad



Francis Tersigni

1/30/25, 1:34 PM

Volunteer: Talk to Voters in Don Valley West — Progress Toronto



[ABOUT US](#) [UPDATES](#) [VOLUNTEER](#) [CONTACT US](#) [DONATE](#)



Talk to Voters in Don Valley West

Don Valley West is having a by-election to choose their next city Councillor on November 4, and it's our opportunity to change who holds power at City Hall. We will be knocking on doors (also known as canvassing) in Don Valley West to learn what issues matter to them and share information about the upcoming by-election.

Join Progress Toronto to survey residents in Don Valley West to learn more about their priorities for the upcoming by-election.

Upcoming Events:

Knock on Doors

Tuesday, October 1st - 6pm

[Eglinton Station](#) (Yonge St & Eglinton Ave)

Never canvassed before? Don't worry! **We will give you support, training, and pair you with an experienced volunteer.** Canvassing at events is a fun way to get out in the community and talk to people about issues that matter to them.

Will you join us? RSVP using this form.

Accessibility Information

If you have any access needs, please let us know at the bottom of the sign up form. Access needs are defined as anything a person may need to communicate, learn, and take part in an activity.



Our Team

Progress Toronto has an exciting team of Staff, Board Members, and Advisors who have come together from across Toronto to build a more progressive city. Scroll down to see our team and click on individual photos to read bios and learn more about their work.

- [Staff Team](#)
- [Board of Directors](#)
- [Advisors](#)

Staff Team



Donovan Hayden



Saman Tabasinejad



Francis Tersigni

Board of Directors



EXHIBIT 5

11/4/24, 11:52 PM

Volunteer: Talk to Voters in Don Valley West — Progress Toronto



[ABOUT US](#) [UPDATES](#) [VOLUNTEER](#) [CONTACT US](#) [DONATE](#)



Talk to Voters in Don Valley West

Don Valley West is having a by-election to choose their next city Councillor on November 4, and it's our opportunity to change who holds power at City Hall. We will be knocking on doors (also known as canvassing) in Don Valley West to learn what issues matter to them and share information about the upcoming by-election.

Join Progress Toronto to survey residents in Don Valley West to learn more about their priorities for the upcoming by-election.

Upcoming Events:

Knock on Doors

Tuesday, October 1st - 6pm

[Eglinton Station](#) (Yonge St & Eglinton Ave)

Never canvassed before? Don't worry! **We will give you support, training, and pair you with an experienced volunteer.** Canvassing at events is a fun way to get out in the community and talk to people about issues that matter to them.

Will you join us? RSVP using this form.

Accessibility Information
















If you have any access needs, please let us know at the bottom of the sign up form. Access needs are defined as anything a person may need to communicate, learn, and take part in an activity.

<https://www.progresstoronto.ca/volunteer-dvw-survey-2024>

1/4

2015

کاندیدا های انتخابات شورای شهر ۲۰۱۸

			
David Mousavi Toronto - ward 18	Hamid Shakeri Toronto - ward 18	Sam Moini Richmond Hill - ward 5	Dyanoosh Youssefi ward 8
			
Hassan Ardeshtir Zarezadeh Toronto - ward 18	Saman Tabasi Nejad Toronto - ward 18	Nima Shahi Richmond Hill - ward 5	Mahnaz Shahbazi Hill - ward 5
			
Ramin Faraji Regional- Richmon Hill	Aria Alavi ward 16	Ali Noroozi Richmond Hill -Mayor	Ali Nikjoo YRDSB - York 3,5,6
			
Kasra Gharibi ward 17	Talib Ansari New Market - Mayor	Reza Khoshdel ward 25	

[December](#)
[November](#)
[October](#)
[September](#)
[August](#)
[July](#)
[June](#)
[May](#)
[April](#)
[March](#)
[February](#)
[January](#)

2014

EXHIBIT 7 a 7b

11/4/24, 11:50 PM

Volunteer to Stop Furey — Progress Toronto



[ABOUT US](#) [UPDATES](#) [VOLUNTEER](#) [CONTACT US](#) [DONATE](#)



Volunteer to Stop Furey!

Right-wing candidate Anthony Furey is running in the Don Valley West by-election. He's trying to make sure voters don't find out about his far-right beliefs. His harmful viewpoints and dangerous political stances are why we're working hard to make sure he doesn't win this election. **We are delivering accountability flyers to the residents of Don Valley West to let them know the truth about Anthony Furey.**

Join one of our flyering events to deliver truth flyers and Stop Furey!

Upcoming Events:

Sunday, November 3

12pm

Leslie & York Mills

[Sign up here!](#)

Sunday, November 3

3pm

York Mills Station

[Sign up here!](#)

Never delivered flyers before? Don't worry! **No experience is needed.** We will bring the flyers, the maps, and one of our experienced volunteers will be on hand to lead the event.

[Learn more about who Anthony Furey is here.](#)

Far-right candidate Anthony Furey is defeated in Don Valley West by-election

Together we defeated far-right candidate Anthony Furey in the Don Valley West by-election held on November 4 2024! Conservatives thought they could elect Furey on his name recognition alone and keep his harmful record secret, but we didn't let that happen.

We crunched the numbers: before we launched our campaign to stop Furey, polls showed he was ahead by over 10%. **On election night, Furey lost by over 23% to former local TDSB Trustee Rachel Chernos Lin. Our collective work helped shape this election.**

Here are some highlights from our campaign made possible by our supporters and volunteers:

- 22,000+ households reached by flyers
- 483 hours volunteered
- 109,000+ people reached in Don Valley West through digital ads
- 38 outreach events in every corner of the ward
- \$8,700 fundraising goal met thanks to generous donors

EXHIBIT 8



Ministry of Municipal Affairs
and Housing

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 immediately paid to the clerk who is responsible for the conduct of the election.

For the campaign period from (day clerk received nomination)			YYYY	MM	DD	to	YYYY	MM	DD
			2024	07	24		2024	12	19

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

☐ Supplementary filing reflecting finances from start of campaign to end of extended campaign period

Box A: Name of Candidate and Office

Candidate's name as shown on the ballot

Last Name or Single Name

Chernos Lin

Given Name(s)

Rachel

Office for which the candidate sought election

Councillor

Ward Name or Number (if any)

15

Municipality

Toronto

Spending limit

General

\$67,944.20

Parties and Other Expressions of Appreciation

\$6,794.42

Contribution Limit

Contributions from Candidate and Spouse

\$19,810.40

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

Box B: Declaration

I, Rachel Chernos Lin, declare that to the best of


my knowledge and belief that these financial statements and attached supporting schedules are true and correct.

Rachel Chernos Lin
Signature of Candidate

2025/01/14

Date (yyyy/mm/dd)

Date Filed (yyyy/mm/dd)	Time Filed	Initial of Candidate or Agent (if filed in person)	Signature of Clerk or Designate
2025/01/15	11:22 a.m.		<u>Christopher [Signature]</u>



Who *really* is Anthony Furey?

Furey spent years advocating for bike lanes, but now he says he's against them?

Furey's in it for himself.

Don't vote for Anthony Furey.

For more information contact:
Progress Toronto, info@progresstoronto.ca (Toronto)

Anthony Furey @anthonyfurey
I'm liking @roccothevoiceTO plans for separated bike lanes downtown.
#VoteTO #BikeTO
10:52 AM - Sep 21, 2016

Comment by Anthony Furey
I am a cycling advocate. The health and environmental aspects benefit us as individuals and as a community. The low costs and quick trip times make it the ideal option for travel within downtown. Not only is a bike cheaper than a car, but you can purchase one for less than the cost of one month's Metropass (something to ponder, Mr. Giambone).

WHO IS ANTHONY FUREY REALLY?

After losing in the 2023 mayoral by-election, far-right candidate Anthony Furey now wants your vote to become your City Councillor in Don Valley West. **But does he deserve it?**

For starters, **Furey does not live here in Don Valley West.**¹ He sees this by-election as his opportunity to get a seat on City Council and come one step closer to his ultimate goal: to be elected as mayor in the next election. Just last month when asked about running for mayor in the 2026 election Furey told reporters he couldn't rule it out.² **Furey is in it for himself.**

To make matters worse, **Furey has a long history of pushing dangerous far-right myths on COVID-19, Islam, gender, and more.** But now that he's running for office, *Furey is trying to distance himself from his record and is trying to win on name recognition alone.*

YOU DESERVE A CITY COUNCILLOR THAT IS COMMITTED TO YOU, NOT HIS OWN POLITICAL AMBITIONS AND A FAR-RIGHT AGENDA.

We wanted to make sure you know who Anthony Furey really is.
Here's just some of his record:

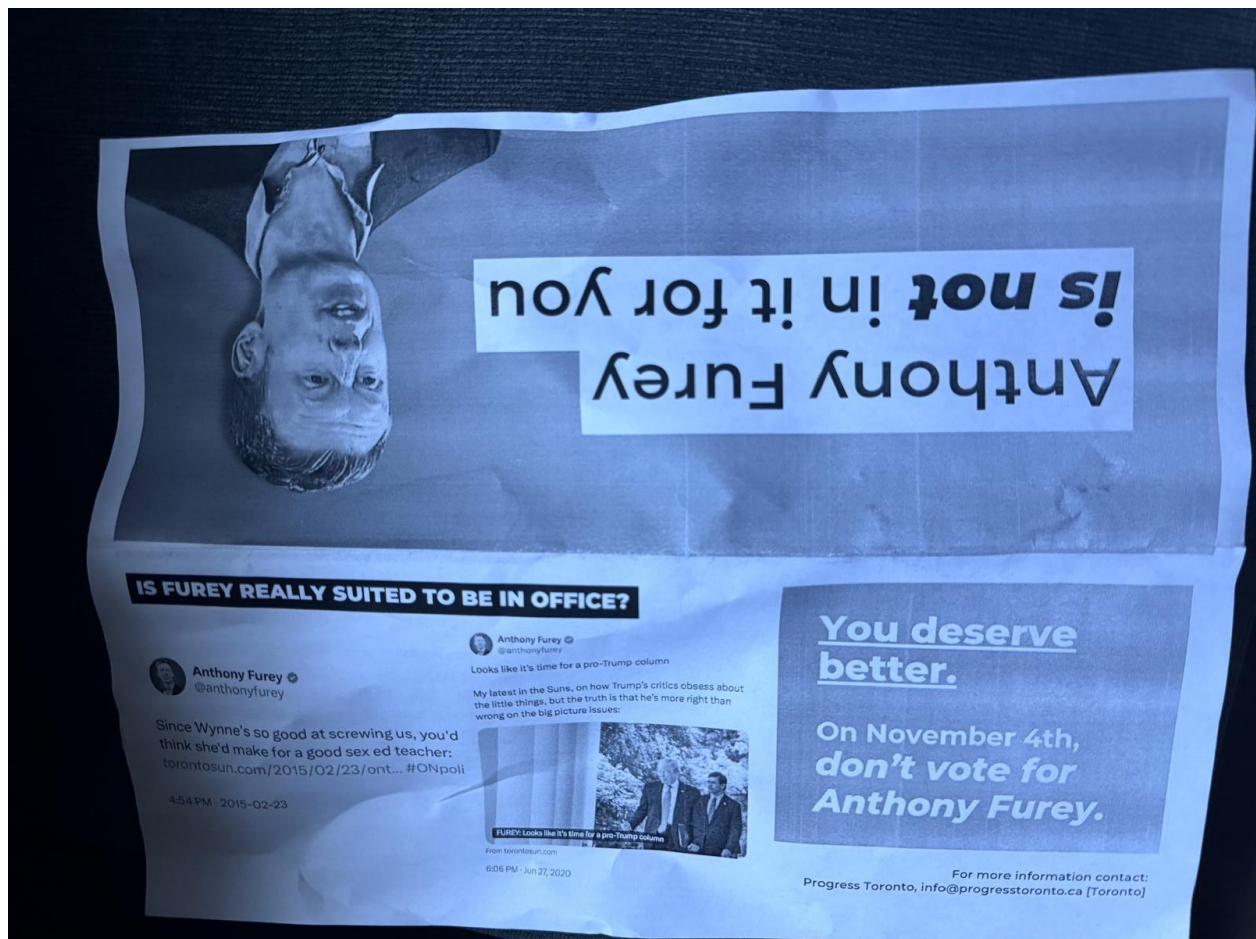
- Pushed anti-vaccine misinformation by describing it as a "hastily developed serum"³ and denied surges of infection during the height of the COVID-19 pandemic in 2020.⁴
- After the 2017 Quebec City Mosque shooting that killed 6 Muslims, Furey opposed a motion to tackle Islamophobia, dismissing it as "compliant-with-Sharia law."⁵
- Spread misinformation about gender identity, accusing the Toronto District School Board of promoting "life-altering gender reassignment surgery" when they asked students to select their gender in a survey.⁶
- Expressed dismay at seeing young Muslim women wearing the hijab, referring to it as "total submission to the will of Allah."⁷

[1] "Anthony Furey Candidate Interview," Leaside Residents Association, 2024. <https://leasideresidents.ca/anthony-furey/>
[2] "I've never seen anything like it: The behind-the-scenes attempts to unite against the right in a Toronto by-election," Ben Spurr, Toronto Star, 2024. <https://www.thestar.com/news/gta/i-ve-never-seen-anything-like-it-the-behind-the-scenes-attempts-to-unite-against-the-right-in-a-toronto-by-election.html>
[3] "A mandatory vaccine in Canada would not go over well," Furey, Toronto Sun, 2020. <https://torontosun.com/opinion/columnists/anthony-furey-a-mandatory-vaccine-in-canada-would-not-go-over-well>

[4] "Toronto Public Health calls for restrictions on day they release inflated numbers," Furey, Toronto Sun, 2020. <https://torontosun.com/opinion/columnists/anthony-furey-toronto-public-health-calls-for-restrictions-on-day-they-release-inflated-numbers>
[5] "Anthony Furey is a media pundit with deeply right-wing views. Why doesn't he want to talk about that now?" Wamica, Toronto Star, 2024. <https://www.thestar.com/news/gta/anthony-furey-is-a-media-pundit-with-deeply-right-wing-views-why-doesnt-he-want-to-talk-about-that-now.html>
[6] "Here's the issue with gender ideology in the classroom," Furey, The Epoch Times, 2023. https://www.theepochtimes.com/opinion/anthony-furey-heres-the-issue-with-gender-ideology-in-the-classroom_5496367

SEE ANTHONY FUREY'S
RECORD:





&:::a Progress Toronto @progresstoronto • Oct 28, 2024

x(...

TOIIIONTO

Far-right candidate Anthony Furey's lead in the Don Valley West by-election is down to just 4%-and narrowing! Why? We're informing residents about Furey's record by delivering accountability flyers right to their doors.

Join us to keep up the momentum: progresstoronto.ca/volunteer-to-s...



r) OA

4 10

3 36

.lr "jov

TOIIONTO Furey has spread hate and lies about Muslims, particularly Muslim women, for over ten years.

Now that he's running for office, Furey is trying to hide his record. His long track record of Islamophobia should not be allowed to influence City Hall



tl. 16

032

il,I 2.5K



TORONTO

Furey has even written an article alarming people about "[t]he rise of the organized Muslim vote in Canada." He takes away Muslim women's agency by insinuating that Muslim women only vote because of their Imams.

His comments are dangerous and contribute to Islamophobia.



Help Stop Furey: progresstoronto.ca --!--

PROGRESS
TORONTO

ii,, 609



&:::a Progress Toronto @progresstoronto • Oct 25, 2024

TOIIIONTO

TL;DR - Furey has a loooooong history of spreading hate against Muslims, particularly Muslim women.

We've heard that Furey is meeting privately with community members saying he's changed. But don't be misled, his record speaks for itself.

Help stop Furey: progresstoronto.ca/stop-furey

Furey has been spreading hate against Muslim women for years.

Now that he's running to be a City Councillor, Furey is meeting privately with community members saying he's changed.

Don't be misled.

His long track record of Islamophobia shouldn't be allowed to influence City Hall.

Progress Toronto, info@progresstoronto.ca [Toronto]

Help Stop Furey: progresstoronto.ca/stop-furey

PROGRESS
TORONTO

ii,, 574



TOIIIONTO

Sign up for Flyer & Fun happening Friday Oct 25

You can help deliver thousands of accountability flyers to Don Valley West voters to let them know about Furey's record.

Then end the evening with post-flyer fun at a restaurant nearby. Learn more:

progresstoronto.ca/dvw-oct-25



0

tl. 3

ii,, 741

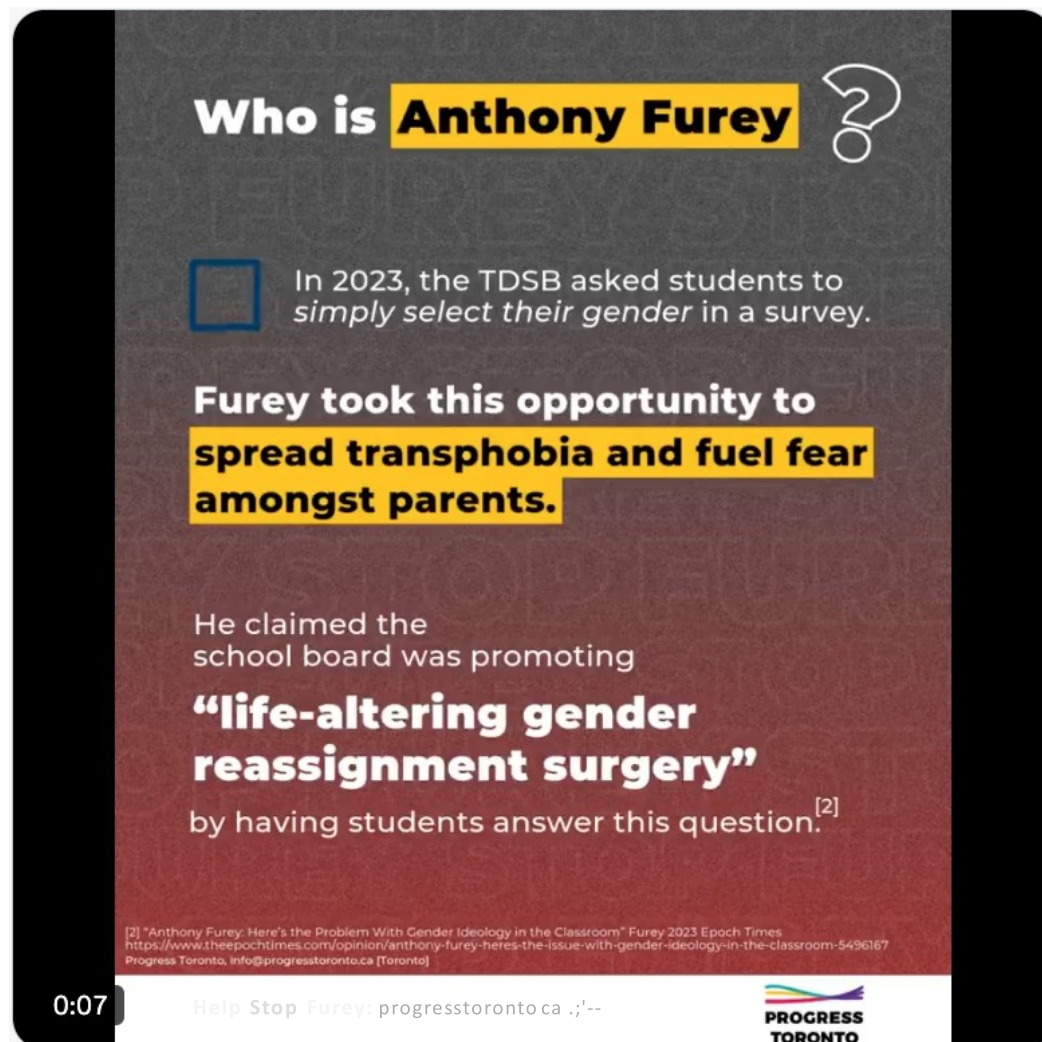


 Progress Toronto @progresstoronto • Oct 21, 2024

TORONTO

When the TDSB asked students to select their gender in a survey, Furey spread transphobia by claiming the school board was promoting "life-altering gender reassignment surgery."

Furey has a long history of stoking fear - that's why we need to stop him:
progresstoronto.ca/stop-furey




Who is Anthony Furey ?

☐ In 2023, the TDSB asked students to *simply select their gender* in a survey.

Furey took this opportunity to spread transphobia and fuel fear amongst parents.

He claimed the school board was promoting **"life-altering gender reassignment surgery"** by having students answer this question.^[2]

[2] "Anthony Furey: Here's the Problem With Gender Ideology in the Classroom" Furey 2023 Epoch Times <https://www.theepochtimes.com/opinion/anthony-furey-heres-the-issue-with-gender-ideology-in-the-classroom-5496167> Progress Toronto, info@progresstoronto.ca [Toronto]

0:07 Help Stop Furey: progresstoronto.ca ;'-- 

tl.10

016

il,l 2,1K



 Progress Toronto @progresstoronto • Oct 21, 2024

TORONTO

If Furey gets elected he will have the power to block progress at City Hall. He'll have a bigger platform to spread his conservative beliefs and embolden right-wing movements across our city.

Sign up to deliver flyers so voters know the truth about Furey:
progresstoronto.ca/volunteer-to-s...



**Local election,
Big consequences**

Residents in Don Valley West will vote for a new councillor on Nov 4.

This is not just about one council seat.

If Anthony Furey gets elected, he will have the opportunity to **block progress** at City Hall.

And he'll have a bigger platform to **embolden far-right movements** in Toronto and beyond.

Progress Toronto, info@progresstoronto.ca [Toronto]

Help Stop Furey: progresstoronto cc1 -;-

**PROGRESS
TORONTO**

tl.10

017

il, I 24K



Progress Toronto @progresstoronto • Oct 31, 2024



Happy Halloween 🎃

Did Anthony Furey defend bullies? That's pretty frightening 🦋 Let's keep the scaries for Halloween, not City Hall by defeating Furey this by-election.

Help us deliver accountability flyers: progresstoronto.ca/volunteer-to-s...



tl. 7

013

il,l 1.3K



Bye bye Furey ""

Furey thought he'd win on name recognition and wanted to avoid running on his harmful record. We didn't let that happen.

Our incredible volunteers dropped 22,000+ flyers telling voters the truth about Furey! When voters learned the truth, they rejected him.



Progress Toronto @progresstoronto • Nov 4, 2024

- Big shout out to our dedicated volunteers who spent hundreds of hours to stop a far-right candidate from getting elected

Our work does not stop on election night. We will continue to organize and win on important issues that impact our city. Join us:

progresstoronto.ca/volunteer



021

tl.23

0160

il.i 12k



Furey's Islamophobic comments are numerous. Here's another one:

He falsely characterized Islam as "the least self-reflecting, least humorous and therefore most troublesome monotheism."

Furey is harmful to Muslim communities. Help stop him:

progresstoronto.ca/stop-furey

Who is Anthony Furey ?

Furey has contributed to fueling hatred against Muslims by falsely characterizing Islam as

"the least self-reflecting, least humorous and therefore most troublesome monotheism." ^[1]

Furey is Islamophobic and harmful.


[1] "When state trumps church" Furey 2015, Toronto Sun
<https://torontosun.com/2015/03/14/when-state-trumps-church>
Progress Toronto, info@progresstoronto.ca [Toronto]

Help Stop Furey: progresstoronto.ca



PROGRESS
TORONTO

 **Progress Toronto** @progresstoronto • Oct 21, 2024

—  And, of course, Furey doesn't even live in Don Valley West. This by-election is his opportunity to get on City Council and come one step closer to his ultimate goal: to be elected as mayor in the 2026 election.

Volunteer: progresstoronto.ca/volunteer-to-s... Donate:
[progresstoronto.ca/donate-to-our...](https://progresstoronto.ca/donate-to-our-...)





Progress Toronto @progresstoronto • Oct 21, 2024

TCMIONTO

Furey pushed anti-vaccine misinformation by describing it as a "hastily developed serum" and denied surges of infection during the height of the COVID-19 pandemic in 2020.

Furey will put communities at risk - let's keep him out of City Hall:
progresstoronto.ca/stop-furey

tl-5

0 17

1.7K



Progress Toronto @progresstoronto • Oct 21, 2024

TCMIONTO

After the 2017 Quebec City Mosque shooting where a white supremacist killed 6 Muslims, Furey opposed a motion to tackle Islamophobia, dismissing it as "compliant-with-Sharia law:•

With Islamophobia on the rise, we need to keep Furey out of office.
progresstoronto.ca/stop-furey

tl-8

0 17

1.9K





Progress Toronto @progresstoronto • Oct 21, 2024

tooIOHTO

ICYMI: We are delivering 20,000 flyers and running ads to let voters know the truth about far-right candidate Anthony Furey in the Don Valley West by-election.

He's hoping to win on his name recognition and doesn't want residents to know the real Furey progresstoronto.ca/stop-furey

092

t.l. 66

098

ilrl 33k



Progress Toronto

tooIOHTO

@progresstoronto

The former Toronto Sun columnist is hoping to win by keeping his extreme views under wraps. Furey, known for his harmful views on Islam, gender identity, and other issues, poses a serious threat not just to City Hall, but to communities across Toronto.

progresstoronto.ca/stop-furey

Who is **Anthony Furey**



Furey writes articles that **push dangerous right-wing theories**—ranging from Islamophobia to transphobia and more.

After his failed mayoral run in 2023,

Anthony Furey is now running in the



Progress Toronto @progresstoronto · Nov 4, 2024



When we launched our campaign to stop Furey, polls showed he was ahead by over 10%. Tonight he's losing by 23%.

The 22,000+ truth flyers we delivered straight to voters' doors made a big impact. That's why our work together is so important & why conservatives are so threatened.

↓ Candidate	↓ Votes Received	↑ Percentage
Rachel Chernos Lin	12339	54.71%
Anthony Furey	7073	31.36%
Sam Robinson	1207	5.35%
Sheena Sharp	518	2.30%
Lesley Stoyan	329	1.46%

Showing 1 to 5 of 16 entries

💬 10

↻ 10

❤ 136

📊 6.8K



EXHIBIT 10

Effect of default by registered third party

88.27 (1) Subject to subsection (6) and in addition to any other penalty that may be imposed under this Act, an individual, corporation or trade union that is registered as a registered third party in relation to an election in a municipality is not entitled to register in relation to a subsequent election in the municipality until after the next regular election has taken place,

- (a) if the registered third party fails to file a document as required under section 88.29 or 88.32 by the relevant date;
- (b) if a document filed under section 88.29 shows on its face a surplus, as described in section 88.31, and the registered third party fails to pay the amount required by subsection 88.31 (4) to the clerk by the relevant date;
- (c) if a document filed under section 88.29 shows on its face that the registered third party has incurred expenses exceeding what is permitted under section 88.21; or
- (d) if a document filed under section 88.32 shows on its face a surplus and the registered third party fails to pay the amount required by that section by the relevant date. 2016, c. 15, s. 61.

Notice of default

(2) In the case of a default described in subsection (1), the clerk shall notify the registered third party in writing that the default has occurred and shall make available to the public the name of the registered third party and a description of the nature of the default. 2016, c. 15, s. 61.

Offences

89 A person is guilty of an offence if he or she,

(h) furnishes false or misleading information to a person whom this Act authorizes to obtain information;

- Flyers were printed and widely distributed to voters that contained false and misleading information.
- The provisioning of these false materials constitutes an offence under section 89 of the MEA

Offences re campaign finances

92. Offences by registered third party

(4) A registered third party is guilty of an offence and, on conviction, in addition to any other penalty that may be imposed under this Act, is subject to the penalty described in subsection 88.27 (1),

- (a) if the registered third party incurs expenses that exceed the amount determined under section 88.21; or
- (b) if the registered third party files a document under section 88.29 or 88.32 that is incorrect or otherwise does not comply with that section. 2016, c. 15, s. 68 (2).

- Progress Toronto did not include any services in kind and the value of those services far exceeds the limit on spending.
- Some services not included: Use of facilities, rent for the four months of the campaign, photocopying, staff salaries, use of phones , internet and website, parking, training courses, costs for canvassing (canvas bags, flyers, buttons etc)
- All of these goods and services must be valued and included as expenses. When they are included, Progress Toronto substantially overspent
- None of the canvassing expenses were declared or if declared were significantly understated and that's a violation
- Progress Toronto is guilty of an offence under 89.4 (a) and (b)
- Saman Tabasinejad signed the third-party application and the financial submission and as such is the responsible authority Exhibit 9
- Saman Tabasinejad was previously a candidate in a Municipal Election in Toronto. She has knowledge of the Municipal Elections Act and as such, these violations cannot be considered to be inadvertent. Exhibit 6

General penalty, individual

94.1 (1) An individual who is convicted of an offence under this Act is liable to the following penalties in addition to any other penalty provided for in this Act:

1. For any offence, a fine of not more than \$25,000.
2. For any offence other than a corrupt practice, the penalties described in subsection 88.23 (2) and 88.27 (1).
3. For an offence under section 90, imprisonment for a term of not more than six months.
4. For any offence that the presiding judge finds that the individual committed knowingly, imprisonment for a term of not more than six months. 2009, c. 33, Sched. 21, s. 8 (68); 2016, c. 15, s. 70.

- Penalties apply to Progress Toronto and to the individual who registered the third party and hold responsibility for the violations

Same, corporation or trade union

(2) A corporation or trade union that is convicted of an offence under this Act is liable to a fine of not more than \$50,000 in addition to any other penalty provided for in this Act. 2009, c. 33, Sched. 21, s. 8 (68).

Effect of default by candidate

88.23 (1) A candidate is subject to the penalties listed in subsection (2), in addition to any other penalty that may be imposed under this Act,

(a) if the candidate fails to file a document as required under section 88.25 or 88.32 by the relevant date;

(b) if a document filed under section 88.25 shows on its face a surplus, as described in section 88.31, and the candidate fails to pay the amount required by subsection 88.31 (4) to the clerk by the relevant date;

(c) if a document filed under section 88.25 shows on its face that the candidate has incurred expenses exceeding what is permitted under section 88.20; or

(d) if a document filed under section 88.32 shows on its face a surplus and the candidate fails to pay the amount required by that section by the relevant date. 2016, c. 15, s. 60.

Penalties

(2) Subject to subsection (7), in the case of a default described in subsection (1),

(a) the candidate forfeits any office to which he or she was elected and the office is deemed to be vacant; and

(b) until the next regular election has taken place, the candidate is ineligible to be elected or appointed to any office to which this Act applies. 2016, c. 15, s. 60.

Ontario

Ministry of Municipal Affairs
and Housing

Instructions

All registrants must complete Boxes A, B, C and D and Schedule 1. All registrants must complete Schedule 2 as appropriate. Registrants 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 registrant or, if the registrant is an individual, their spouse) shall be immediately paid to the clerk who was responsible for the conduct of the election.

For the campaign period from

YYYY	MM	DD
2 0 2	41 1 0	0 0

 to

YYYY	MM	DD
2 0 2	4 1 2	1 9

12] Initial filing reflecting finances from start of campaign to December 31 (or 45 days after voting day in a by-election)

D Supplementary filing reflecting finances from start of campaign to end of extended campaign period

Box A: Name of Registrant

Name of Registrant (individual, trade union or corporation)

Progress Toronto

Official Representative (name of person signing on behalf of trade union or corporation) Last Name or Single Name Given Name(s)

Tabasi Nejad

Saman

Municipality
Toronto

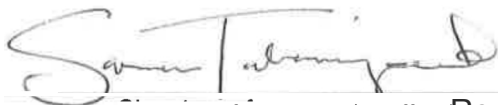
Spending Limit-
General
\$8,702.60

Spending Limit - Parties and Other Expressions of
Appreciation
\$ 870.26

Box B: Declaration

I, Saman Tabasi Nejad, a registrant (or official representative),

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



Signature of Registrant (or Official Representative)

'JOZe;-'/ol /06

Date (yyyy/mm/dd)

Date Filed (yyyy/mm/dd)	Time Filed	Initial of Registrant, Official Representative or Agent (if filed in person)	Signature of Clerk or Designate
2025-01-06	3:05 p.m		<i>KDonovan</i>

Box C: Statement of Campaign Income and Expenses

LOAN

Name of bank or recognized lending institution

Amount borrowed

\$

INCOME

Total amount of all contributions (from line 1A in Schedule 1)

+ \$ 9,228.00

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

+ \$ 0.71

Other (provide full details)

1. + \$

2. + \$

3. + \$

4. + \$

5. + \$

6. + \$

Total Campaign Income (Do not include loan)= \$ 9,228.71 **C1****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) Advertising

+ \$ 4,853.78

Brochures/flyers

+ \$ 1,500.41

Signs (including sign deposit)

+ \$

Meetings hosted

+ \$ 143.48

Office expenses incurred until voting day

+ \$ 1,112.81

Phone and/or internet expenses incurred
until voting day

+ \$ 101.41

Salaries, benefits, honoraria, professional fees incurred until voting day	+	\$	
Bank charges incurred until voting day	+	\$	
Interest charged on loan until voting day	+	\$	
Other (provide full details)			
1.	+	\$	
2.	+	\$	
3.	+	\$	
4.	+	\$	
5.	+	\$	
6.	+	\$	
Total Expenses subject to general spending limit	=	\$	<u>7,711.89</u> C2
2. Expenses subject to spending limit for parties and other expressions of appreciation			
1. <u>Appreciation parties - post e-day</u>	+	\$	<u>457.39</u>

2.	+ \$	
3.	+ \$	
4.	+ \$	
5.	+ \$	
Total Expenses subject to spending limit for parties and other expressions of appreciation		<u>\$ 457.39 C3</u>

3. Expenses not subject to spending limits

Accounting and audit	+ \$	621.50
Cost of fundraising events/activities (list details in Part IV of Schedule 2)	+ \$	437.93
Office expenses incurred after voting day	+ \$	
Phone and/or internet expenses incurred after voting day	+ \$	
Salaries, benefits, honoraria, professional fees incurred after voting day	+ \$	
Bank charges incurred after voting day	+ \$	
Interest charged on loan after voting day	+ \$	
Expenses related to recount	+ \$	
Expenses related to controverted election	+ \$	
Expenses related to compliance audit	+ \$	
Expenses related to registrant's disability (provide full details)		
1.	+ \$	
2.	+ \$	
3.	+ \$	
4.	+ \$	
5.	+ \$	
Other (provide full details)		
1.	+ \$	
2.	+ \$	
3.	+ \$	
4.	+ \$	
5.	+ \$	
Total Expenses not subject to spending limits	= \$	<u>1,059.43 C4</u>

Total Campaign Expenses (C2 + C3 + C4) = \$

9,228.71 CS

Box 0: Calculation of Surplus or Deficit

Excess (deficiency) of income over expenses
(Income minus Total Expenses) (C1 - CS)

+ \$ D1

If there is a surplus, deduct any refund of registrant's or spouse's contributions to the campaign

- \$

Surplus (or deficit) for the campaign

= \$ D2

If line D2 shows a surplus, the amount must be paid in trust, at the time the financial statements are filed, to the municipal clerk who was responsible for the conduct of the election.

Schedule 1 - Contributions

Part I - Summary of Contributions

Contributions in money from registrant and (if individual) spouse + \$
Contributions in goods and services from registrant and (if individual) spouse(include value listed in Table 1 and Table 2)
+ \$

Total value of contributions not exceeding \$100 per contributor

- Include ticket revenue, contributions in money, goods and services where the total contribution from a contributor is \$100 or less (do not include contributions from registrant or spouse). + \$ 7,078.00

Total value of contributions exceeding \$100 per contributor (from line 1B; list details in Tables 3-6)

- Include ticket revenue, contributions in money, goods and services where the total contribution from a contributor exceeds \$100 (do not include contributions from registrant or spouse). + \$ 2,150.00

Less: Ineligible contributions returned or payable to the contributor

\$ Contributions paid or payable to the clerk, Including contributions from anonymous sources exceeding \$25

-
- \$

Total Amount of Contributions (record under Income in Box C)

= \$ 9,228.00 1A

Part II - Contributions from registrant or spouse

Table 1: Contributions in goods or services

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

D Additional information is listed on separate supplementary attachment, if completed manually.

Table 2: Inventory of campaign goods and materials from previous municipal campaign used in this campaign (Note: Value must be recorded as a contribution from the registrant and as an expense.)

Description	Date Acquired (yyyy/mm/dd)	Supplier	Quantity	Current Market Value(\$)

Total				

D Additional information is listed on separate supplementary attachment, If completed manually.

Part 111- Contributions exceeding \$100 - contributors other than registrant or spouse

Table 3: Monetary contributions from Individuals other than registrant or spouse

Name	Full Address	Date Received (yyyy/mm/dd)	Amount Received(\$)	Amount Returned to Contributor or Paid to Clerk (\$)
Chris Wu	41 Dovercourt Road, Toronto, ON, M6J 3C2	2024/10/21	350.00	
Todd Irvine	307 Craven Road, Toronto, ON, M4L 2Z5	2024/10/10	300.00	
Douglas Murray	17 Deering Crescent, Toronto, ON, M2M 2A2	2024/10/11	200.00	
Karen Kaplan	172 Howland Avenue, Toronto, ON, M5R 3B6	2024/10/23	150.00	
Patricia Lakin-Thomas	98 Roberta Drive, Toronto, ON, M6A 2J7	2024/10/12	150.00	
Total			1,150.00	

D Additional information is listed on separate supplementary attachment, if completed manually.

Table 4: Monetary contributions from corporations or trade unions

Name (legal and carrying on business as)	Full Address	President or Business Manager	Authorized Representative	Date Received (yyyy/mm/dd)	Amount Received (\$)	Amount Returned to Contributor or Paid to Clerk (\$)
UA Local 46	936 Warden Ave., Scarborough, ON M1L 4C9	Tony Scialdone	Dave Griffiths	2024/11/19	1,000.00	
Total					1,000.00	

D Additional information is listed on separate supplementary attachment, if completed manually.

Table 5: Contributions In goods or services from individuals other than registrant 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(\$)	Amount Returned to Contributor or Paid to Clerk (\$)
Total					

D Additional information is listed on separate supplementary attachment, if completed manually.

Table 6: Contributions in goods or services from corporations or trade unions (Note: Must also be recorded as Expenses in Box C.)

Name (legal and carrying on business as)	Full Address	President or Business Manager	Authorized Representative	Description of Goods or Services	Date Received (yyyy/mm/dd)	Value (\$)	Amount Returned to Contributor or Paid to Clerk(\$)

Total

--

D Additional information is listed on separate supplementary attachment, if completed manually.

Total for Part III (Add totals from Tables 3-6) (Record in Part 1 - Summary of Contributions)

\$ **2,150.0018**

Schedule 2 - Fundraising Events and Activities

Complete a separate schedule for each event or activity held.

D Additional schedule(s) attached, if completed manually.

Fundraising Event/Activity 1

Description of fundraising event/activity Fundraising Activity for campaign period, merchant bank

Date of event/activity (yyyy/mm/dd) 2024/12/19

Part I - Ticket revenue

Admission charge (per person)

\$ _____ **2A**

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

x _____ **28**

Number of tickets sold

= \$

Total Part I (2A X 28) (Include in Part I of Schedule 1)

Part II - Other revenue deemed a contribution

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

1. Merchant bank processed contributions received + \$ 8,228.00

2. _____
+ \$ _____

3. _____ + \$ _____

4. _____ + \$ _____

5. _____
+ \$ _____

= \$ **8,228.00**

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

Part III - Other revenue not deemed a contribution

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

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.	<u>Merchant bank fees for fundraising activity</u>	+ \$	437.93	
2.		+ \$		
3.		+ \$		
4.				
5.				
Total Part IV Expenses (include under Expenses in Box C)				= \$ 437.93

Auditor's Report

Municipal Elections Act, 1996 (Section 88.25)

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

Municipality

Date (yyyy/mm/dd)

Contact Information

Last Name or Single Name

Given Name(s)

Licence Number

Address

Suite/Unit Number Street Number

Street Name

Municipality

Province

Postal Code

Telephone Number

Email Address

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

D Report is attached

Personal information, if any, collected on this form is obtained under the authority of sections 88.29 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.