

**In the matter of a Compliance Audit request for Progress Toronto's Third Party
Advertisement Campaign in the 2024 By-election in Don Valley West.**

SUBMISSIONS OF PROGRESS TORONTO

WRITTEN SUBMISSIONS OF PROGRESS TORONTO IN RESPONSE TO AN APPLICATION FOR A COMPLIANCE AUDIT MADE BY DEBORAH LECHTER

BACKGROUND AND OVERVIEW

1. Progress Toronto is a not-for-profit corporation that advocates and organizes for a more democratic, socially just, and progressive City. Progress Toronto does this through a variety of activities. Progress Toronto is involved in training of advocates, advocating on particular issues, canvassing citizens for their views on issues and participating in City of Toronto municipal politics. Progress Toronto has been registered as a Third Party advertiser in previous City of Toronto elections.
2. Progress Toronto is a corporation carrying on business in the Province of Ontario. As part of the registration process to become a Third Party Advertiser in the Ward 15 By-election (“the By-election”), Progress Toronto was required to show documents proving its status as a corporation to the City Clerk’s office. Progress Toronto was registered as a Third Party Advertiser for the By-election on October 8, 2024. The corporate document is attached as **Tab 1**. The Certificate of Registration from the City Clerk’s office is attached at **Tab 2**. We note that the City Clerk’s decision to register Progress Toronto as a Third Party Advertiser is final in accordance with s. 88.6(14) of the *Municipal Elections Act* (“the MEA”) and therefore cannot be subject to challenge in the Compliance Audit process.
3. Progress Toronto was advised of the Third Party Advertiser spending limits on Registration by the City Clerk’s office. Attached as **Tab 3** is the official document from the City Clerk dated September 20, 2024. As set out in that document the “final general spending limit” for a Third Party Advertiser in the By election was \$8,702.60. In addition, the “final spending limit for holding parties and other expressions of appreciation after the close of voting” was \$870.26.
4. As set out above, Progress Toronto’s Registration as a Third Party Advertiser was effective on October 8, 2024. That is the date on which Progress Toronto was able to commence soliciting contributions from eligible individuals and entities and when it was able to commence spending money on Third Party advertising for the By-election.
5. Progress Toronto has complied with all of the requirements and duties of a Third Party Advertiser in the By-election. There are no grounds to order a Compliance Audit and this Application should be dismissed.
6. Progress Toronto takes this opportunity to respond in writing to each of the allegations contained in the Application. The Application sets out some 23 to 25 allegations. Progress Toronto will respond to each of the numbered allegations. The numbered allegations are found in the longer version of the Application under the heading “VIOLATIONS”. For ease of reference, each of the headings below

corresponds to the number and title of the alleged “violation” contained in the Application. To reiterate, Progress Toronto denies each and every allegation contained in the Application (and in the supplementary material) and respectfully requests that the Application be dismissed.

7. While Progress Toronto will address each violation further below, it appears that the Applicant has sometimes referred to an old version of the *Municipal Elections Act* (“*MEA*”). This no doubt accounts for many of the legal errors that are evident in the Application. Other errors appear to stem from a fundamental misunderstanding of what a Third Party advertiser is allowed to do in a municipal campaign. Finally, many of the allegations lack any of the required evidence which is necessary to substantiate the alleged violation. Progress Toronto will point out all of the problems with this Application (and there are many) in this Response.

1. **Expenses and Campaigning occurred before Registration**

8. The essence of the allegation is that Progress Toronto began its Third Party advertising campaign prior to its Registration on October 8, 2024. This allegation is false. The definition of “third party advertisement” is set out in ss. 1(1) of the *MEA*. “Third party advertisement” means “an advertisement in any broadcast, print, electronic or other medium that has the purpose of promoting, supporting or opposing, (a) a candidate or (b) a “yes” or “no” answer to a question referred to in subsection 8 (1), (2) or (3)”. There were no “questions” on the By-election ballot so only the first aspect of the definition with respect to promoting, supporting or opposing a candidate is relevant.
9. As “proof” of the allegation, the application points to their Exhibits 2a, b and c, and Exhibits 4a, b and c which are screenshots from the Progress Toronto website. First, the actual “photos” which are part of Exhibits 2a, b and c are stock photos that depict previous canvassing done by Progress Toronto unrelated to the By-election campaign. Exhibits 4a, b and c are also screenshots from the Progress Toronto website.
10. Second, the activities to which the Applicant is referring are surveying and outreach activities that are not “third party advertisements” within the meaning of the *MEA*. Attached as **Tab 4** is the flyer distributed to households during the canvasses referred to in the Application. Attached at **Tab 5** is a draft “script” to be used by canvassers during the canvasses referred to in the Application. Furthermore, Applicant Exhibit 4 (page 21 of the Application) explicitly states the purpose of “Talk to Voters in Don Valley West” as being “to survey residents in Don Valley West to learn more about their priorities in the upcoming by-election”. None of this is “third party advertising” promoting, supporting or opposing a particular candidate. Therefore, there were no expenses incurred or campaigning within the meaning of the *MEA* since the flyers and canvassing did not meet the definition of third party advertising in the *MEA*.

11. The purpose of the canvass was to inform voters in the Ward that there was a By-election coming up and asking those voters and residents what issues were important to them.
12. As is evident from the flyer and the script, there is nothing in any of the documents that “promotes, supports or opposes” a particular candidate. Progress Toronto is entitled to canvass residents of the Ward informing them of the upcoming By-election and seeking their views with respect to the issues important to them and the type of candidate that they wish to represent them.
13. In short, the statements contained in the Application and the relevant exhibits do not and cannot disclose a violation of the *MEA* and therefore should be dismissed.

2. Contributions in kind received before registration

14. This allegation is somewhat related to the allegation directly above and refers to Exhibits 2a, b and c. Again, the survey outreach activities conducted prior to Registration are not “third party advertisements” as defined in the *MEA*. Therefore, there are no “contributions” or “expenses” for these activities that come within the third party advertising requirements under the *MEA*. To reiterate, the pre-election activities engaged in by Progress Toronto prior to the campaign period were non-partisan surveying of the electorate which is not prohibited (or regulated) by the *MEA*. Therefore there are no “contributions” or “expenses” incurred that related to the Third Party Advertiser spending limits or the rules concerning Third Party advertisements contained in the *MEA* .

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.

15. Progress Toronto has a bank account that was used exclusively for the third party advertising campaign. Attached at **Tab 6** are the Bank documents which demonstrate that the account had a zero balance on October 8th (the day that the third party registration was approved). The banking documents also indicate that all contributions and expenses were received by or paid out of this account.
16. Once again, to the extent that this allegation refers to the “pre-election” surveys and canvasses, these are not “third party advertising” expenses or contributions and are therefore not required to be received or paid out of the third party advertising account. This allegation also complains that training was done for the canvassing on October 1st. Given that the training was training given to canvassers for the pre-election survey and canvasses, such training expenses were not “third party expenses” within the meaning of the *MEA*.

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

17. The Application refers to Applicant Exhibit 3 as “evidence” of Progress Toronto advertising after voting day. First, and simply put, Exhibit 3 is not a “third party advertisement” within the meaning of the *MEA*. Progress Toronto did not advertise after election day (it is unclear why anyone would bother since the election is over on election day). Exhibit 3 is not an advertisement but was a sharing of election results and the efforts of Progress Toronto in the by-election campaign with supporters of Progress Toronto after the election was completed. Letting supporters know of the success or failure of the third party campaign is not “third party advertising”. In any event, these were posts on Progress Toronto’s website and Instagram site and no costs were incurred in their production or distribution.

18. Furthermore, s. 88.4 reads as follows:

(1) No individual, corporation or trade union shall incur expenses for a third party advertisement 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.

(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.

By the Applicants own admission (when she states “notices and ads that ran promoted Progress Toronto” as meeting their goal), the point of these “notices and ads” was not to promote, support or oppose a candidate and therefore are not third party elections advertisements. In addition, since these “notices and ads” contain the result of the By-election, they are not advertisements placed during the “restricted period” since they were created after the closing of voting on voting day. Finally, ss. 88.4(2) defines a “restricted period” beginning on registration day and ending on voting day. There are no restrictions on post election day spending except with respect to “appreciation” parties (which have a separate spending limit and for which Progress Toronto spent well below the “appreciation party” limit). The Applicant’s submissions are wrong both in fact and law.

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

19. Please refer back to Progress Toronto’s answers to allegations 1-3 above. The pre-election canvass was not “third party advertising” and therefore there was no requirement to pay for those expenses out of the third party bank account. Moreover, since the “expenses” were not relevant expenses there was no requirement to have “contributions” in the bank account to pay those non-eligible expenses. Please see the banking documents at **Tab 6**. All contributions and expenses related to the Third Party advertising campaign were paid into or paid out of the Third Party advertising bank account.

6. No loan reported

20. Here the theory behind the allegation is similar to the allegations contained in 1-3 and 5 above. The pre-campaign canvassing expenses were not expenses related to third party advertisements and therefore there was no “loan” required. Moreover, there is no requirement in the *MEA* that eligible expenses be paid for on the day that they occurred.
21. Expenses become expenses when they are paid for by the Third Party advertiser and not when they are incurred. Otherwise, every media outlet that booked an advertisement for a registered third party, ran that advertisement (during the election period) and then billed the campaign for the cost of that advertisement would be “loaning” the campaign the amount of the cost of that advertisement between when the ad ran and when it was billed and paid for. The expense crystallizes when it is paid not on some other date. Finally, there is no evidence that expenses were incurred or paid for outside of the appropriate period set out in the *MEA*. The *MEA* only requires that the expenses be incurred during the campaign period. (See ss. 88.21(2)). All of the third party advertising expenses were incurred during the campaign period set out in the Act.

7. Donations not reported

22. In their Application, the Applicant quotes what appears to ss. 88.8(12) of the *MEA*. The first part of the subsection prohibits third party advertisers from accepting cash contributions greater than \$25. The Application does not allege that Progress Toronto received any cash contributions greater than \$25. The Application does allege that the *MEA* requires that donations over \$25 must be reported with contributor’s name and address. This is completely incorrect. The City of Toronto only requires disclosure of contribution amounts of more than \$100. Those donations were properly disclosed on Progress Toronto’s Financial Statement (see p. 5 of 8). There is no legal requirement to disclose contributions of \$100 or less.
23. That said, attached as **Tab 7** is an electronic copy of the list of contributors and an example of the receipt that each donor received when they made their contribution. The page is redacted in terms of the names and addresses of those donating \$100 or less. The names and addresses of those contributors who donated more than \$100 are also on the list. The list at **Tab 7** is a complete list of all persons who contributed to the third party campaign. All of the contributions from individuals were through the website and set out in **Tab 7**, with the exception of the \$1,000 donation from a trade union (which is explained further below and disclosed separately on the Financial Statement) which was made by cheque.

8. Fundraiser expenses not reported properly

24. This allegation misinterprets Progress Toronto's Financial statement. The Applicant assumes that there was some sort of fundraiser in the traditional sense of a ticketed event with corresponding expenses. There was no such fundraiser and the Application provides no evidence that there was a traditional fundraiser. Progress Toronto's Financial Statement indicates that a total income of \$9,228.71 which consisted of \$9,228.00 in contributions and 0.71¢ of bank interest (p. 2 of 8). The Financial Statement then lists under "expenses not subject to spending limits" an amount of \$437.93 as the "cost of fundraising events/activities". This expense is detailed further below on the Financial Statement (p. 7 of 8) as "merchant bank fees for fundraising activity". Contributions to Progress Toronto's third party advertising campaign were processed through the Progress Toronto website through fundraising tools called Donorbox and Stripe. The fees for those services (\$437.93) are properly "expenses not subject to the spending limits" because they were costs associated with fundraising activities (and not an event).
25. Therefore, there was no fundraising event and therefore no expenses were reported for such a "non-event". The Application alleges that the amounts reported do not reconcile. That is incorrect. In total, Progress Toronto raised \$9,228.00 and received 0.71¢ in bank interest for a "total campaign income" of \$9,228.71 (see line C1 on page 2 of 8 of the Financial Statement). Of that amount, \$1,000 was received via cheque from UA Local 46 and was disclosed on p. 5 of 8 of the Financial Statement. Therefore \$8,228.00 from individual donors was received through the Progress Toronto website. This amount is not reported as a "lump sum donation" as alleged by the Applicant. It is the total amount of many contributions made by eligible individuals to the campaign. The \$7,078.00 referred to in the Application is in reference to the breakdown of contributions on Schedule 1 of the Financial Statement. \$7,078.00 is the total of all contributions of \$100 or less. Then there are amounts greater than \$100 which total \$2,150.00 all of which are disclosed on page 5 of 8 of the Financial Statement. There was \$1,150.00 received from individuals who gave more than \$100 and \$1,000 from UA Local 46 (a trade union).
26. These amounts are all properly disclosed according to law and according to the requirements of the Financial Statement. Again, the Applicant misunderstands or misrepresents the situation which is clearly explained on Progress Toronto's Financial Statement.

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

27. The Applicant is just wrong about the ability of trade unions to contribute to Third Party advertisers. The Applicant appears to be relying on an earlier version of the *MEA*. S. 88.12(3) of the current version of the *MEA* specifically allows for trade union contributions to third party advertising campaigns. The \$1,000 donation by

UA Local 46 was disclosed on Progress Toronto's Financial statement and was below the maximum allowed contribution of \$1,200. Progress Toronto also relies on the Financial Statement form which specifically requires disclosure of contributions from trade unions and corporations.

28. This allegation is yet another example of the Applicant trying to smear Progress Toronto and waste the time of the Committee.

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

29. Again, the Applicant does not understand the difference between being required to disclose the date on which contributions over \$100 were received and the date on which trade union contributions were received, and when various expenses were incurred. The Applicant also continues to falsely allege that Progress Toronto held a fundraiser on December 19th. There was no fundraiser as set out further above. The amounts raised and disclosed on the Financial Statement are totals of the various types of contributions received. Other than the donations received that were greater than \$100 and the trade union donation, other donations were raised through Progress Toronto's website and deposited to the Progress Toronto separate bank account when received. There is no evidence that "the majority" of the donations came on December 19, 2024. That is factually incorrect just like the allegation that there was a fundraiser on December 19, 2024. The bank statement indicates that the account was never in a negative balance or overdraft position.

30. This allegation also makes a number of other sub-allegations. The first is that "sources of revenue for Progress Toronto" must be disclosed. There is no requirement that Progress Toronto disclose its sources of revenue. Progress Toronto has disclosed all the sources of revenue with respect to the Third Party Advertising Campaign. Those sources of revenue have been disclosed on the Financial Statement. The fact that the Applicant does not understand this is no fault of Progress Toronto. The second sub-allegation is that Progress Toronto has used revenue from other sources. That sub-allegation is covered in the paragraphs above. There is no evidence of this. The third sub-allegation is that one separate bank account must be used. That has been addressed above. There was only one bank account and the statements are attached at **Tab 6**.

31. The final sub-allegation is that Progress Toronto is a corporation and all services have to be valued and included. They were and are set out as required on p. 2 of 8 of the Financial Statement.

11. Salaries not reported

32. Again the Applicant is in error to state that the staff campaigned for three months. As indicated above, pre-election activities were not third party advertisements for the reasons set out above. Also given that the Applicant is either mistaken or is

deliberately misleading the Committee, the repeated allegation of a December 19, 2024 fundraiser is completely wrong. Finally, the Application is again misleading or inaccurate in stating that the registration was October 10, 2024. The registration was granted on October 8, 2024. These inaccuracies are rife through the Application.

33. All distribution of the advertising flyers were done by volunteers. Volunteer, unpaid labour is neither a contribution nor expense under the *MEA*. Progress Toronto staff are also permitted to volunteer on a third party advertising campaign provided that they do not receive extra compensation for doing so. See *MEA*, s. 88.15(4) paras. 1 and 2. The work done by volunteers or employees who volunteer is also not an “expense” since its value is not a “contribution” within the meaning of s. 88.19(3). Therefore, there was and is no requirement to account for the salaries of Progress Toronto employees all of whom freely volunteered on the third party advertising campaign. More specifically, s. 88.15(4) paras. 1 and 2 state that “the value of services provided by voluntary labour” and “the value of services provided voluntarily,... by an employee...” are not “contributions” to the third party campaign. Ss. 89.13(3) requires that “the value of **contributions** of goods and services” are an expense. Since the voluntary labour and services provided by employees voluntarily are not “contributions” they are also not expenses under ss. 89.19(3) of the *MEA*.

12. Unaudited return

34. Frankly, this allegation makes no sense. Progress Toronto’s Financial Statement discloses expenses of less than \$10,000. Therefore an audited return is not required. As set out above volunteer labour (including of employees of Progress Toronto) is not a contribution. Nor are they deemed to be a “donation in kind”. The other types of expenses such as use of facilities, photocopying, etc. are disclosed and set out on the Financial Statement. The Applicant provides no evidence to support their bald assertion that there are “unreported expenses” which would either violate the spending limits or trigger the requirement for an audited financial statement. That said, Progress Toronto retained an accountant to assist in the preparation of the Financial Statement, and that expense is accounted for and disclosed at p. 3 of 8 under “Accounting and audit”. The accounting and audit expenses of \$621.50 are properly listed as “expenses not subject to spending limits”.

13. Endorsing one candidate

35. Progress Toronto did not endorse any candidates in the By-election. Progress Toronto did oppose a candidate, Anthony Furey, who was defeated in the By-election. Under the *MEA*, Third Party advertisers are allowed to “oppose” a candidate and Progress Toronto did so. Third party advertisers are not permitted to coordinate their third party campaign with that of a candidate. Progress Toronto did not coordinate with any candidate and the Applicant provides no evidence that

Progress Toronto did so. The Exhibits referred to in the Application, (Exhibits 7a and 7b) refer to defeating Anthony Furey, and the only mention of candidate Chernos-Lin was in reference to the fact that she won the By-election. To be clear, Progress Toronto did not endorse Ms. Chernos-Lin, did not campaign on her behalf and did not contribute to her campaign. Once again, there is no foundation for the Applicant's complaint in this regard.

14. Eligibility for Registration

36. This allegation is entirely unclear. Progress Toronto applied to the City of Toronto clerk for registration as a Third Party advertiser. In doing so, Progress Toronto supplied the clerk with all the information required and was granted registration. S.88.6(14) of the *MEA* states that "the clerk's decision to certify or reject a notice of registration is final". As set out in **Tab 1**, Progress Toronto provided the City Clerk's office with proof of incorporation prior to Registration. At **Tab 2**, is the document approving Progress Toronto as a third party advertiser.
37. It would appear that the Applicant is trying to make a case that Progress Toronto somehow was not eligible to file a notice of registration since it was a candidate in the By-election. Progress Toronto is not eligible to be a candidate since it is a corporation and not a legal person. If the Applicant's theory is somehow that a candidate filed a notice of registration for Progress Toronto, this is entirely untrue and there is no evidence to support such a wild accusation. If the Applicant's theory is that Progress Toronto was somehow a "stalking horse" for a candidate, this is equally preposterous. There is no evidence provided by the Applicant to prove any coordination or collaboration between Progress Toronto and any By-election candidate.

15. Contributions to candidates

38. This appears to be an allegation that Progress Toronto donated to a candidate campaign. There is no such donation. There is no evidence that Progress Toronto did anything in support of a candidate such that it could be deemed a contribution. Opposing a particular candidate does not mean that Progress Toronto was making a contribution to another candidate. Progress Toronto is permitted to support or oppose certain candidates as a Registered Third Party advertiser and did not coordinate its activities with any candidate, and the Application discloses no such evidence of coordination.
39. The Application cites s. 88.5 (see page 42 of their materials), but s. 88.5 of the current Act deals with mandatory information in third party advertisements. Progress Toronto assumes that the Applicant is referring to s. 88.15(3) which states that money, goods and services given by an individual, trade union or corporation are contributions. But that means contributions to the third party advertiser and not that these third party advertiser contributions are contributions to candidates. Again there was no coordination between any candidate campaign

and Progress Toronto's third party advertisement campaign. Further, "contributions" of volunteer, unpaid labour and the value of services received voluntarily by an employee of Progress Toronto are not "contributions". See ss. 88.15(4) paras. 1 and 2 of the *MEA*.

40. The Applicant seems to suggest that Progress Toronto had a duty to consider other candidates (see p. 13 of the Applicant's submissions). Progress Toronto did not endorse any candidates and there is no evidence provided that it did so. Further, there is nothing in the *MEA* preventing a third party advertiser from opposing a particular candidate or candidates (or supporting candidates in their advertisements for that matter). Indeed, the whole point of requiring registration for third party advertisers is if they advertise to support, promote or oppose candidates in the election. What is prohibited is any coordination between a candidate's campaign and a third party advertising campaign. There is no evidence of coordination or collaboration between Progress Toronto and any candidate. Therefore there is no legal requirement to include Progress Toronto's third party advertising expenses in any candidate expenses. Further, while a candidate's Form 8 has been included in the Applicant's materials, Progress Toronto is not aware that the Applicant has requested a compliance audit with respect to that candidate's campaign. Again, this demonstrates that the Application has no merit.

16. Expenses not declared

41. Progress Toronto agrees that the spending limit was \$8,702.60 for its third party advertising campaign and an additional 10% for post-election appreciation parties. Progress Toronto spent \$457.39 for post-election appreciation parties which was well below the \$870.26 spending limit for such events. Progress Toronto also did not exceed the spending limits for the third party advertising campaign and declared all required expenses on the Financial Statement.

17. Office Expenses not disclosed or included.

42. Progress Toronto invoiced the third party campaign for office expenses incurred between Registration day and voting day. Progress Toronto calculated an appropriate percentage of its overall office expenses to the third party campaign. Therefore the total charged for office expenses until voting day was set out on the Financial Statement as \$1,112.81. The Applicant is mistaken (as set out above) that the campaigning continued until December 19th. The Financial Statement asks that Progress Toronto provide "office expenses incurred until voting day" (see p. 2 of 8) which is precisely what Progress Toronto did.

18. PT disclosed that their flyers were photocopied.

43. Contrary to the allegations contained in the Application, Progress Toronto did include flyer printing on the Financial Statement. It appears under “Brochure/flyers” on page 2 of 8 in the amount of \$1,500.41. This includes an amount of \$1,311.21 for flyer printing, \$175.00 for printer rental and \$14.20 for flyer delivery. The breakdown is attached. A cost of around 5¢ per flyer is reasonable and in line with what the Applicant suggests. As noted the Applicant indicates that the costs “exceed” \$1,000.00. That is correct, the flyer photocopy charges, including printer rental and an amount for flyer delivery, were \$1,500.41 all in and reported in their entirety on the Financial Statement.

Printing of 27,643 flyers

Break down:

- 1500 flyers printed on white, BW, double-sided at a cost of \$0.0496394 per flyer (\$74.46)
- 25,548 flyers printed on white, BW, double-sided at a cost of \$0.0472325 per flyer (\$1206.70)
- 595 flyers printed on “Golden Rod”, BW, double-sided, at a cost of \$0.0504982 per flyer (\$30.05)

19. Digital advertising under valued

44. As disclosed on the Financial Statement, Progress Toronto spent \$4,853.41 on “Advertising”, all of which was digital advertising and included ad costs and design fees. The Applicant provides no evidence of what they consider “market value” or why the amounts spent and recorded are unreasonable.

20. Website not declared as an expense

45. First, as set out above, portions of the website that were used for pre- and post-campaign events, trainings and volunteers are not campaign expenses incurred during the election period and do not count against expense limits. There was no incremental cost to Progress Toronto for its website to allow the campaign to post on the website. The third party campaign was billed for access to Progress Toronto’s digital tools for \$175 (which is included in the office rent disclosed and set out above). Progress Toronto “unpublished” the campaign page once the election was over (as it has done in the past) to make sure supporters are not confused by old information. There is no cost or expense to this deletion.
46. The Applicant asks questions about cell phone use but provides no evidence. Progress Toronto staff use their own phones which means that there are no staff cell phone charges paid by Progress Toronto or the third party campaign. There is no incremental cost to the cell phones that could be attributed to the Third party campaign by Progress Toronto

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

47. All canvassing and brochure delivery (including the production of the brochures) was done by Progress Toronto volunteers. Volunteer “labour” is neither a contribution nor an expense. Any additional expenses for canvassing were listed on the Financial Statement as \$143.48, which included things like snacks for volunteers.

22. Over-contributions

48. Progress Toronto appropriately billed the Third Party campaign for any resources used by the Campaign, i.e. office rent, digital tools, etc. Therefore there are no over contributions. Moreover, s. 88.13(3) of the *MEA* states that the maximum contribution limits do not apply to the registered Third Party themselves. That said, there were no contributions made by Progress Toronto to its third party campaign. We have dealt with allegations of under-reported expenses or services further above.

23. False and misleading information

49. This appears to be a “drive-by” allegation pertaining to the flyers distributed by Progress Toronto during its authorized third party advertising campaign. There are no falsehoods or defamatory content in the Exhibits referred to. That said, the section of the *MEA* quoted by the Applicant does not apply to the “content” of the advertising. The Compliance Audit process does not inquire into the content or nature of the campaign or its advertisements, only the aspects of the financial disclosure and Financial Statement. That said, Progress Toronto stands by the statements made in the advertising and the flyers/brochures.

24. Penalties and violations under the Act--Exhibit 10

50. This purports to be “an outline of potential penalties stated in the Act that could apply to the violations”. For the reasons stated above, Progress Toronto states that there have been no violations of the *Act*. Progress Toronto has refuted each and every allegation made by the Applicant. The Applicant’s request for a compliance audit of Progress Toronto’s Third Party advertisement campaign should be dismissed with prejudice.
51. The Applicant is unhappy that their preferred candidate lost the election and because Progress Toronto ran a successful and lawful campaign against that candidate, reminding voters of that failed candidate’s previous positions. The Application is brought in bad faith and for an improper purpose, namely to falsely accuse Progress Toronto of wrongdoing and to tie up its resources in responding to this Application. The Application is entirely without merit and should be dismissed.

Summary

25. This Application is entirely without merit. Progress Toronto has responded to each and every allegation above. Many of those allegations are based on a misunderstanding or misapplication of the appropriate laws, facts and rules applicable to third party advertising campaigns. The fact that the Applicant is, in this process, alleging that Progress Toronto was distributing defamatory material is indicative that this Application is being brought in retaliation against Progress Toronto for its part in the By-election campaign which resulted in the resounding defeat of Anthony Furey. This Application should be dismissed.

Date: February 21, 2025

List of Exhibits

- 1. Corporate document**
- 2. Progress Toronto Certificate of Registration**
- 3. City of Toronto Final Maximum Spending Limits**
- 4. Pre-election Survey Flyer**
- 5. Don Valley West Survey Script**
- 6. Progress Toronto Third Party Campaign Bank Statement (October, 2024)**
- 7. Donor records and donor receipt**



Certificate of Incorporation

Canada Not-for-profit Corporations Act

Certificat de constitution

*Loi canadienne sur les organisations à but non
lucratif*

PROGRESS TORONTO

Corporate name / Dénomination de l'organisation

1066652-1

Corporation number / Numéro de
l'organisation

I HEREBY CERTIFY that the above-named corporation, the articles of incorporation of which are attached, is incorporated under the *Canada Not-for-profit Corporations Act*.

JE CERTIFIE que l'organisation susmentionnée, dont les statuts constitutifs sont joints, est constituée en vertu de la *Loi canadienne sur les organisations à but non lucratif*.

Virginie Ethier

Director / Directeur

2018-03-12

Date of Incorporation (YYYY-MM-DD)
Date de constitution (AAAA-MM-JJ)

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	
XXXXXXXXXX			

Additional names are listed on separate supplementary attachment

Box D: Declaration of Qualification

I, Saman Tabasi Nejad, the Registrant (or Official Representative of the Registrant), referred to in this notice, do hereby declare that:

- 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).

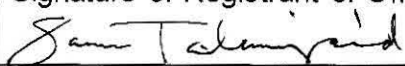
Signature of Registrant or Official Representative <i>Saman Tabasi Nejad</i>		Date (yyyy-mm-dd) 2024-10-08	
Date Filed (yyyy-mm-dd) 2024-10-08	Time Filed 3:39	Initial of Registrant or Official Representative STW	Signature of City Clerk or Designate <i>Chris White</i>

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 <i>Chris White</i>	Date Certified (yyyy-mm-dd) 2024-10-08
--	---

Acknowledgement of Compliance and Eligibility

Last Name of Registrant or Official Tabasi Nejad	First Name of Registrant or Official 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)	
Name of Corporation or Trade Union (if applicable) Progress Toronto	
<input type="checkbox"/> I am an individual third party registrant. <ol style="list-style-type: none"> 1. I am qualified pursuant to the <i>Municipal Elections Act, 1996 ("Act")</i> to be a registered third party advertiser in the Toronto election. <ol style="list-style-type: none"> a. Without limiting the generality of paragraph 1, I am an individual who normally resides in Ontario and I am not a candidate whose nomination has been filed under the <i>Act</i>. b. I am not disqualified under the <i>Act</i> or any other legislation to be a registered third party advertiser. c. Any third party advertisement which I may make shall not be under the direction of a candidate whose nomination has been filed under section 33 of the <i>Act</i>. 	
<input checked="" type="checkbox"/> I am the official representative of the above-named corporation or trade union. <ol style="list-style-type: none"> 1. As the official representative of the above-named corporation or trade union, I declare that the corporation or trade union that I represent is qualified pursuant to the <i>Municipal Elections Act, 1996</i> to be registered as a third party advertiser in the Toronto election. <ol style="list-style-type: none"> a. Without limiting the generality of paragraph 1: <ol style="list-style-type: none"> i. the corporation that I represent carries on business in Ontario. ii. the trade union that I represent holds bargaining rights in Ontario. b. The corporation or trade union that I represent, is not ineligible or disqualified under the <i>Act</i> or any other legislation to be a registered third party advertiser. c. Third party advertisements made by the corporation or trade union that I represent shall not be under the direction of a candidate whose nomination has been filed under section 33 of the <i>Act</i>. 	
Signature of Registrant or Official Representative 	
Date (yyyy-mm-dd) 2024-10-08	

City Clerk's Office collects personal information on this form under the legal authority of the Municipal Elections Act, 1996, sections 88 and 88.6. This information will be used for the purpose of assessing whether the Registrant may be certified as a registered third party advertiser. Your information will be filed with the City Clerk and will be available 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 the Project Manager, 100 Queen Street, West, 1st floor, Toronto, Ontario, M5H 2N2 or by telephone at 416-338-1111.

Final Maximum Spending Limits

Registered Third Party Advertiser

This certificate provides you with the final:

- General spending limit
- Spending limit for parties and other expressions of appreciation after the close of voting

The final spending limits are based upon whichever is higher:

- The number of electors from the voters' list as of September 15 for the previous election
- The number of electors from the voters' list as of September 20, 2024

Any registered third party advertiser who exceeds the final spending limits may be subject to penalties under the *Municipal Elections Act, 1996*.

Election	For
2024 Councillor Ward 15 By-Election	Registered Third Party Advertiser

Calculations:

General spending limit based on number of electors from the previous election:

- 69,318 electors @ 5 cents per elector plus \$5,000.00 = \$8,465.90

General spending limit based on number of electors from the current election:

- 74,052 electors @ 5 cents per elector plus \$5,000.00 = \$8,702.60

Spending limit for holding parties and other expressions of appreciation after the close of voting:

- \$8,702.60 x 10% = \$870.26

Final general spending limit:	Final spending limit for holding parties and other expressions of appreciation after the close of voting:
\$ 8,702.60	\$870.26

I hereby certify the final maximum spending limits as shown above.

Signature of Clerk

Date September 20, 2024



Did you know you can elect a councillor on Nov 4?

Due to the unexpected passing of City Councillor Jaye Robinson, Don Valley West will be heading to the polls and choosing a City Councillor on Monday November 4.

It's an important opportunity for you and your neighbours to **elect a City Councillor that will build an affordable city with the services to meet residents' needs.**

We're finally starting to see leadership from City Hall to address long-standing problems with our city, including transit, affordable housing, congestion, and more. But more needs to be done.

Don Valley West has the opportunity to elect a councillor who is committed to the people of our city. But to elect a dedicated councillor, we need your help.

TELL US WHAT YOU WANT IN A NEW COUNCILLOR



Progress Toronto will be working in the upcoming election to help ensure the best progressive representation.

Fill out our survey and let us know what your priorities are:

progresstoronto.ca/2024-dvw-survey

Help elect a councillor who will improve our city

On November 4, you have the opportunity to go to the polls and elect a new City Councillor who prioritizes investing in communities and our city.

Toronto is facing an affordability crisis and we need all councillors to focus on building affordable housing, addressing transit and congestion, and investing in services. **This election is an opportunity for you to elect a councillor who is dedicated to your community and our city.**

You have an opportunity to elect a dedicated City Councillor who will tackle the biggest problems faced by our city and your community. **You can elect a councillor who will vote to invest in libraries, community centres, transit, infrastructure, and more.**

Fill out our survey online and let us know your priorities.

TELL US YOUR PRIORITIES



Progress Toronto will be working in the upcoming election to help ensure the best representation for Don Valley West.

Fill out our survey and let us know what your priorities are:

progresstoronto.ca/2024-dvw-survey

Don Valley West Survey

Volunteer Name: _____

Canvass Date: _____

1 – Progressive _____

Doors Knocked: _____

2 – Progressive leaning _____

People Spoken To: _____

3 – Unclear _____

Key Trends: _____

4 – Conservative _____

Thank you for volunteering with Progress Toronto! The goal of this canvass is not to persuade people, but to hear people out. We want to get people to start thinking about the by-election and to help inform our election work over the next few months.

Script:

Hi! My name is ___ and I am a volunteer with Progress Toronto. We are a non-profit that advocates and organizes for a more democratic and socially just city. Are you aware that after the passing of City Councillor Jay Robinson, you will be electing a City Councillor on November 4?

We're knocking on doors today to ask residents what issues are important to them for the upcoming by-election. I have three quick survey questions to ask.

1) What are 1 to 3 issues that you want your councillor to focus on?

2) What are 1 to 3 qualities you are looking for in a candidate?

3) Have you heard of any candidates running that you're excited or not excited about?

Thank you for participating in our survey. This election is an opportunity for you to elect a councillor who is dedicated to your community and our city. We would love to stay in touch to share our results with you as well as send you voter information as the election gets closer.

Could I get your name? Email? Phone Number? [ask one at a time]

Thank you so much! If you want to follow our election work, you can find out information on the flyer and follow us on social media. Have a good day!

[record information and mark tallies]

Canvass Lead Phone Number: _____

PROGRESS TORONTO
401 Richmond St W Suite 436
Toronto ON M5V 3A8

Important Updates to Our Business and Community Operation of Account Agreements

Dear Member,

We are updating our Business and Community Operation of Account Agreements (OAA) to better reflect the services and procedures you use day to day. The revised OAA, is effective December 1, 2024, provides clearer guidance on the roles and responsibilities of authorized users, signers, account owners, and Alterna Savings. This update is part of our ongoing commitment to making it easier for you to manage your accounts with confidence and transparency.

OAA's are subject to change from time to time in order to evolve with our services. We will notify you in advance of any such changes, and we encourage you to familiarize yourself with the revised terms and [download](#) a copy for your records.

As always, we're here to help! If you have any questions or need assistance, reach out to us through our [Contact Centre](#) or visit any [branch](#).

Thank you for trusting us with your banking needs. We're committed to providing you with the best possible service every day.

Thank you for your membership.

Alterna Savings

STATEMENT PERIOD
01 Oct. 2024 to 31 Oct. 2024

BRANCH
XXXXXXXXXX

ACCOUNT
XXXXXXXXXX

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PROGRESS TORONTO
401 Richmond St W Suite 436
Toronto ON M5V 3A8

Member Service Center and Telephone Banking
613.560.0100 / 416.252.5621
1.877.560.0100
Fax
613.560.0177 / 416.679.0339
1.866.560.0177
Lost and stolen cards
613.560.0160 / 1.888.807.4101
Internet and Online Banking
www.alterna.ca

Summary of your accounts

	AMOUNT (\$)
Share accounts	15.00
Daily banking accounts	7,790.07

Your daily banking accounts

Community Plus Chequing 1

DATE	TRANSACTION	WITHDRAWAL (\$)	DEPOSIT (\$)	BALANCE (\$)
01 Oct.	Balance forward			\$0.02
04 Oct.	Service Charge	0.02		0.00
16 Oct.	Misc Payments - STRIPE		552.91	552.91
17 Oct.	Misc Payments - STRIPE		3,544.11	4,097.02
18 Oct.	Misc Payments - STRIPE		2,524.02	6,621.04
21 Oct.	Misc Payments - STRIPE		184.72	6,805.76
22 Oct.	Misc Payments - STRIPE		142.42	6,948.18
23 Oct.	Misc Payments - STRIPE		80.44	7,028.62
24 Oct.	Misc Payments - STRIPE		292.36	7,320.98
25 Oct.	Misc Payments - STRIPE		188.86	7,509.84
28 Oct.	Misc Payments - STRIPE		137.35	7,647.19
29 Oct.	Misc Payments - STRIPE		142.73	7,789.92
31 Oct.	Credit Interest		0.15	7,790.07
31 Oct.	Closing totals	0.02	7,790.07	\$7,790.07

STATEMENT PERIOD

01 Oct. 2024 to 31 Oct. 2024

BRANCH



ACCOUNT



PAGE

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Name	Donor First Name	Donor Last Name	Date	Amount	Processing Fee	Platform Fee	Total Fee	Net Amount	Address	City	State / Province	Postal Code	Country
Chris Wu	Chris	Wu	2024/10/21 19:47:50	350	13.55	6.13	19.68	330.32	41 Dovercourt Road	Toronto	ON	M6J 3C2	Canada
Todd Irvine	Todd	Irvine	2024/10/10 21:47:53	300	9	5.25	14.25	285.75	307 Craven Road	Toronto	ON	M4L 2Z5	Canada
Douglas Murray	Douglas	Murray	2024/10/11 10:08:13	200	6.1	3.5	9.6	190.4	17 Deering Crescent	Toronto	ON	M2M 2A2	Canada
Patricia Lakin-Thor	Patricia	Lakin-Thomas	2024/10/12 19:16:45	150	4.65	2.62	7.27	142.73	98 Roberta Drive	Toronto	ON	M6A 2J7	Canada
Karen Kaplan	Karen	Kaplan	2024/10/23 20:35:11	150	4.65	2.62	7.27	142.73	172 Howland Avenue	Toronto	ON	M5R 3B6	Canada
			2024/10/12 12:20:56	100	3.2	1.75	4.95	95.05					
			2024/10/15 13:09:13	100	3.2	1.75	4.95	95.05					
			2024/10/10 19:52:18	100	3.2	1.75	4.95	95.05					
			2024/10/11 13:21:25	100	3.2	1.75	4.95	95.05					
			2024/10/10 22:13:24	100	3.2	1.75	4.95	95.05					
			2024/10/10 20:21:47	100	3.2	1.75	4.95	95.05					
			2024/10/12 10:30:32	100	3.2	1.75	4.95	95.05					
			2024/10/11 12:42:11	100	3.2	1.75	4.95	95.05					
			2024/10/16 16:03:01	100	3.2	1.75	4.95	95.05					
			2024/10/11 9:25:44	100	3.2	1.75	4.95	95.05					
			2024/10/12 10:42:47	100	3.2	1.75	4.95	95.05					
			2024/10/11 20:40:17	100	3.2	1.75	4.95	95.05					
			2024/10/17 14:29:48	100	3.2	1.75	4.95	95.05					
			2024/10/13 14:54:12	100	3.2	1.75	4.95	95.05					
			2024/10/23 8:00:41	100	3.2	1.75	4.95	95.05					
			2024/10/13 20:49:16	100	3.2	1.75	4.95	95.05					
			2024/10/10 19:44:16	100	3.2	1.75	4.95	95.05					
			2024/10/10 19:41:25	100	3.2	1.75	4.95	95.05					
			2024/10/12 13:34:29	100	3.2	1.75	4.95	95.05					
			2024/10/11 12:48:05	100	3.2	1.75	4.95	95.05					
			2024/10/10 20:44:09	100	3.2	1.75	4.95	95.05					
			2024/10/10 22:41:52	100	3.2	1.75	4.95	95.05					
			2024/10/11 7:41:53	100	3.2	1.75	4.95	95.05					
			2024/10/15 8:48:51	100	3.2	1.75	4.95	95.05					
			2024/10/11 6:50:24	100	3.2	1.75	4.95	95.05					
			2024/10/11 12:21:16	100	3.2	1.75	4.95	95.05					
			2024/10/12 9:58:43	100	3.2	1.75	4.95	95.05					
			2024/10/11 8:32:02	80	2.62	1.4	4.02	75.98					
			2024/10/14 12:09:43	75	2.48	1.31	3.79	71.21					
			2024/10/11 16:52:44	50	1.75	0.88	2.63	47.37					
			2024/10/11 10:30:03	50	1.75	0.88	2.63	47.37					
			2024/10/10 20:44:55	50	1.75	0.88	2.63	47.37					
			2024/10/10 20:03:37	50	1.75	0.88	2.63	47.37					
			2024/10/11 0:36:16	50	1.75	0.88	2.63	47.37					
			2024/10/13 21:44:22	50	1.75	0.88	2.63	47.37					
			2024/10/11 10:42:10	50	1.75	0.88	2.63	47.37					
			2024/10/11 22:03:01	50	1.75	0.88	2.63	47.37					
			2024/10/13 9:25:54	50	1.75	0.88	2.63	47.37					
			2024/10/22 18:31:19	50	1.75	0.88	2.63	47.37					
			2024/10/10 20:24:39	50	1.75	0.88	2.63	47.37					
			2024/10/10 20:36:10	50	1.75	0.88	2.63	47.37					
			2024/10/11 17:49:31	50	1.75	0.88	2.63	47.37					
			2024/10/10 19:44:11	50	1.75	0.88	2.63	47.37					

Name	Donor First Name	Donor Last Name	Date	Amount	Processing Fee	Platform Fee	Total Fee	Net Amount	Address	City	State / Province	Postal Code	Country
			2024/10/16 15:50:24	50	1.75	0.88	2.63	47.37					
			2024/10/10 20:38:25	50	1.75	0.88	2.63	47.37					
			2024/10/10 23:22:31	50	1.75	0.88	2.63	47.37					
			2024/10/10 20:56:57	50	1.75	0.88	2.63	47.37					
			2024/10/10 21:58:22	50	1.75	0.88	2.63	47.37					
			2024/10/18 17:58:11	50	1.75	0.88	2.63	47.37					
			2024/10/14 18:11:10	50	1.75	0.88	2.63	47.37					
			2024/10/12 17:39:09	50	1.75	0.88	2.63	47.37					
			2024/10/12 11:00:26	50	1.75	0.88	2.63	47.37					
			2024/10/10 20:09:07	50	1.75	0.88	2.63	47.37					
			2024/10/12 12:18:41	50	1.75	0.88	2.63	47.37					
			2024/10/16 23:59:52	50	1.75	0.88	2.63	47.37					
			2024/10/14 17:43:03	50	1.75	0.88	2.63	47.37					
			2024/10/11 6:41:25	50	1.75	0.88	2.63	47.37					
			2024/10/10 20:11:52	50	1.75	0.88	2.63	47.37					
			2024/10/11 8:01:26	50	1.75	0.88	2.63	47.37					
			2024/10/10 20:40:49	50	1.75	0.88	2.63	47.37					
			2024/10/13 10:30:09	50	1.75	0.88	2.63	47.37					
			2024/10/12 11:45:56	50	1.75	0.88	2.63	47.37					
			2024/10/15 8:31:35	50	1.75	0.88	2.63	47.37					
			2024/10/22 19:50:13	50	1.75	0.88	2.63	47.37					
			2024/10/12 10:31:16	50	1.75	0.88	2.63	47.37					
			2024/10/14 15:41:25	50	1.75	0.88	2.63	47.37					
			2024/10/10 20:16:07	50	1.75	0.88	2.63	47.37					
			2024/10/11 11:41:53	50	1.75	0.88	2.63	47.37					
			2024/10/13 7:47:22	50	1.75	0.88	2.63	47.37					
			2024/10/11 23:31:56	50	1.75	0.88	2.63	47.37					
			2024/10/15 10:19:11	50	1.75	0.88	2.63	47.37					
			2024/10/11 15:16:01	50	1.75	0.88	2.63	47.37					
			2024/10/10 20:13:28	50	1.75	0.88	2.63	47.37					
			2024/10/10 22:04:22	50	1.75	0.88	2.63	47.37					
			2024/10/11 16:06:31	50	1.75	0.88	2.63	47.37					
			2024/10/13 1:41:43	50	1.75	0.88	2.63	47.37					
			2024/10/11 18:18:58	40	1.46	0.7	2.16	37.84					
			2024/10/13 13:59:55	40	1.46	0.7	2.16	37.84					
			2024/10/18 17:00:30	35	1.32	0.61	1.93	33.07					
			2024/10/11 10:48:49	25	1.03	0.44	1.47	23.53					
			2024/10/22 10:39:42	25	1.03	0.44	1.47	23.53					
			2024/10/12 13:36:55	25	1.03	0.44	1.47	23.53					
			2024/10/10 21:04:23	25	1.03	0.44	1.47	23.53					
			2024/10/12 12:26:14	25	1.03	0.44	1.47	23.53					
			2024/10/10 19:05:08	25	1.03	0.44	1.47	23.53					
			2024/10/14 19:29:46	25	1.03	0.44	1.47	23.53					
			2024/10/14 12:12:54	25	1.03	0.44	1.47	23.53					
			2024/10/23 11:40:50	25	1.03	0.44	1.47	23.53					
			2024/10/10 23:04:30	25	1.03	0.44	1.47	23.53					
			2024/10/15 17:37:14	25	1.03	0.44	1.47	23.53					
			2024/10/10 22:15:19	25	1.03	0.44	1.47	23.53					

Name	Donor First Name	Donor Last Name	Date	Amount	Processing Fee	Platform Fee	Total Fee	Net Amount	Address	City	State / Province	Postal Code	Country
			2024/10/14 17:34:46	25	1.03	0.44	1.47	23.53					
			2024/10/22 19:30:00	25	1.03	0.44	1.47	23.53					
			2024/10/12 10:05:01	25	1.03	0.44	1.47	23.53					
			2024/10/12 10:04:57	25	1.03	0.44	1.47	23.53					
			2024/10/11 8:52:19	25	1.03	0.44	1.47	23.53					
			2024/10/10 20:15:43	25	1.03	0.44	1.47	23.53					
			2024/10/11 7:12:44	25	1.03	0.44	1.47	23.53					
			2024/10/12 20:35:52	25	1.03	0.44	1.47	23.53					
			2024/10/10 19:39:59	25	1.03	0.44	1.47	23.53					
			2024/10/10 18:55:42	25	1.03	0.44	1.47	23.53					
			2024/10/11 11:40:54	25	1.03	0.44	1.47	23.53					
			2024/10/10 18:26:44	25	1.03	0.44	1.47	23.53					
			2024/10/10 21:21:42	25	1.03	0.44	1.47	23.53					
			2024/10/10 19:56:46	25	1.03	0.44	1.47	23.53					
			2024/10/10 19:58:40	25	1.03	0.44	1.47	23.53					
			2024/10/16 14:37:00	25	1.03	0.44	1.47	23.53					
			2024/10/22 14:04:56	25	1.03	0.44	1.47	23.53					
			2024/10/12 11:40:09	25	1.03	0.44	1.47	23.53					
			2024/10/12 13:07:35	25	1.03	0.44	1.47	23.53					
			2024/10/10 20:36:59	25	1.03	0.44	1.47	23.53					
			2024/10/10 20:11:23	25	1.03	0.44	1.47	23.53					
			2024/10/10 20:27:47	25	1.03	0.44	1.47	23.53					
			2024/10/10 22:43:09	25	1.03	0.44	1.47	23.53					
			2024/10/11 9:33:28	25	1.03	0.44	1.47	23.53					
			2024/10/10 20:11:39	25	1.03	0.44	1.47	23.53					
			2024/10/11 8:18:23	25	1.03	0.44	1.47	23.53					
			2024/10/13 15:21:31	25	1.03	0.44	1.47	23.53					
			2024/10/15 0:41:30	25	1.03	0.44	1.47	23.53					
			2024/10/11 9:21:56	25	1.03	0.44	1.47	23.53					
			2024/10/11 4:34:53	25	1.03	0.44	1.47	23.53					
			2024/10/12 16:38:56	25	1.03	0.44	1.47	23.53					
			2024/10/12 16:13:09	25	1.03	0.44	1.47	23.53					
			2024/10/14 16:31:24	25	1.03	0.44	1.47	23.53					
			2024/10/11 8:48:43	25	1.03	0.44	1.47	23.53					
			2024/10/22 17:11:06	25	1.03	0.44	1.47	23.53					
			2024/10/10 20:55:38	25	1.03	0.44	1.47	23.53					
			2024/10/13 11:56:16	25	1.03	0.44	1.47	23.53					
			2024/10/10 19:49:10	25	1.03	0.44	1.47	23.53					
			2024/10/19 15:07:09	25	1.03	0.44	1.47	23.53					
			2024/10/10 19:52:50	25	1.03	0.44	1.47	23.53					
			2024/10/13 15:38:08	25	1.03	0.44	1.47	23.53					
			2024/10/20 9:13:05	25	1.03	0.44	1.47	23.53					
			2024/10/12 15:52:07	25	1.03	0.44	1.47	23.53					
			2024/10/16 18:47:00	20	0.88	0.35	1.23	18.77					
			2024/10/10 22:39:29	20	0.88	0.35	1.23	18.77					
			2024/10/11 9:37:23	20	0.88	0.35	1.23	18.77					
			2024/10/23 18:28:24	20	0.88	0.35	1.23	18.77					
			2024/10/11 11:17:52	20	0.88	0.35	1.23	18.77					

Name	Donor First Name	Donor Last Name	Date	Amount	Processing Fee	Platform Fee	Total Fee	Net Amount	Address	City	State / Province	Postal Code	Country
			2024/10/10 20:39:26	15	0.74	0.26	1	14					
			2024/10/12 13:18:39	15	0.74	0.26	1	14					
			2024/10/10 22:19:38	15	0.74	0.26	1	14					
			2024/10/10 20:50:03	10	0.59	0.18	0.77	9.23					
			2024/10/10 20:37:37	10	0.59	0.18	0.77	9.23					
			2024/10/20 10:14:02	10	0.59	0.18	0.77	9.23					
			2024/10/11 16:51:19	10	0.59	0.18	0.77	9.23					
			2024/10/10 20:22:19	10	0.59	0.18	0.77	9.23					
			2024/10/10 19:53:58	10	0.59	0.18	0.77	9.23					
			2024/10/11 8:04:23	10	0.59	0.18	0.77	9.23					
			2024/10/12 16:45:40	10	0.59	0.18	0.77	9.23					
			2024/10/13 22:58:34	10	0.59	0.18	0.77	9.23					
			2024/10/12 11:43:51	10	0.59	0.18	0.77	9.23					
			2024/10/11 12:27:48	10	0.59	0.18	0.77	9.23					
			2024/10/11 6:26:36	10	0.59	0.18	0.77	9.23					
			2024/10/10 22:30:02	10	0.59	0.18	0.77	9.23					
			2024/10/11 10:54:33	10	0.59	0.18	0.77	9.23					
			2024/10/10 20:19:52	10	0.59	0.18	0.77	9.23					
			2024/10/12 15:45:02	10	0.59	0.18	0.77	9.23					
			2024/10/11 8:24:17	10	0.59	0.18	0.77	9.23					
			2024/10/11 10:04:04	10	0.59	0.18	0.77	9.23					
			2024/10/10 19:46:20	10	0.59	0.18	0.77	9.23					
			2024/10/13 10:11:59	10	0.59	0.18	0.77	9.23					
			2024/10/12 14:04:19	10	0.59	0.18	0.77	9.23					
			2024/10/10 19:41:58	10	0.59	0.18	0.77	9.23					
			2024/10/11 6:32:51	10	0.59	0.18	0.77	9.23					
			2024/10/10 13:28:31	5	0.45	0.09	0.54	4.46					
			2024/10/10 20:51:30	3	0.39	0.05	0.44	2.56					



Dear [REDACTED]

This is a receipt for your gracious donation to Progress Toronto's Don Valley West By-Election Campaign 2024.

Organization: **Progress Toronto By-Election 2024 Campaign**

Campaign: **Stop Furey 2024**

Donor Name: [REDACTED]

Amount: **C\$25**

Donation Interval: **One-time**

Receipt #: **46732407**

Donated At: **2024/10/23 11:40:50 EDT**

Payment Method: **Visa** [REDACTED]

Donor Address:



Phone: [REDACTED]

Thank you,

Progress Toronto By-Election Campaign 2024