Agenda – Including Addeds

2018 Municipal Election Compliance Audit Committee

5th Meeting of the Municipal Election Compliance Audit Committee

July 26, 2019, 10:00 AM

Committee Room #5, Second Floor, City Hall

Members
A. Wright (Chair), D. Ross, C. Scrimgeour, and C. Saunders (Secretary).

The City of London is committed to making every effort to provide alternate formats and communication supports for Council, Standing or Advisory Committee meetings and information, upon request. To make a request for any City service, please contact accessibility@london.ca or 519-661-2489 ext. 2425.

1. Call to Order
   1.1 Disclosures of Pecuniary Interest

2. Consent Items

3. Items for Discussion
   3.1 Application by Bill Armstrong for Compliance Audit of Shawn Lewis
      a) S. Lewis Financial Statement

   3.2 Application by Stephen Turner for Compliance Audit of Amir Farahi
      a) (ADDED) S. Turner Presentation
      b) (ADDED) Gardiner Roberts LLP Letter

   3.3 Application by Stephen Turner for Compliance Audit of Blackridge Strategies
      a) (ADDED) S. Turner Presentation
      b) (ADDED) Gardiner Roberts LLP Letter

   3.4 Application by Stephen Turner for Compliance Audit of Barry Phillips
      a) (ADDED) S. Turner Presentation
      b) (ADDED) B. Phillips Letter
      c) (ADDED) K. Phillips Letter

4. Deferred Matters/Additional Business

5. Adjournment
Application for a Compliance Audit
Section 88.33 and 88.35 Municipal Elections Act, S.O. 1996, c. 32
The Corporation of the City of London
Municipal Election Compliance Audit Committee

Affidavit of Applicant

I, William Armstrong, a Citizen of the City of London in the Province of Ontario,

DO SOLEMNLY DECLARE:

I am an eligible elector in the City of London by virtue of the fact that:

- I am a Canadian Citizen;
- I am at least 18 years of age as of October 22, 2018;
- I am a resident, owner or tenant of land, or the spouse of such owner or tenant of land in the City of London; and
- I am not prohibited from voting under Section 17 (3) of the Municipal Elections Act, 1996 or otherwise prohibited by law.

I have reasonable grounds to believe that Shawn Lewis a Candidate or
Registered Third Party in relation to the October 22, 2018 Municipal Election for the City of London has contravened the following provision(s) of the Municipal Elections Act, S.O. 1996, c. 32 (Act)

See attached documents (list specific section(s) of the Act)

The particulars of this belief are outlined in the attached Schedule A (please outline reasons for your belief on the page labeled "Schedule A" and attach any supporting documents).

This affidavit is made for the purpose of requesting that this matter be reviewed and for no other purpose.

SWORN (or DECLARED) before me at the City of London in the Province of Ontario on June 27, 2019.

Signature of applicant

Sarah Corman, a Commissioner for Taking Affidavits and Oaths, Middlesex County, while a deputized Clerk of The Corporation of the City of London.

Please see attached Schedule A

Applicant's address: 46 Martinet Ave, London, ON N5V 4B7
Applicant's telephone number: 226-700-3707
Applicant's e-mail address: armstrongassociates@2.0@gmail.com

This application and supporting documents will be placed on a public agenda and shared with the Compliance Audit Committee, the Auditor chosen to investigate this application (if applicable) and the Council of the City of London. The personal information collected on this form is collected under the authority of the Municipal Act, 2001 and the Municipal Elections Act, 1996 for the purpose of applying for a compliance audit of a candidate's election campaign finances. Pursuant to the Municipal Elections Act, 1996 this completed document is a public record, despite anything in the Municipal Freedom of Information and Protection of Privacy Act, 1990 and, until its destruction may be inspected 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 City Clerk, 300 Dufferin Avenue, London ON (519) 661-2489 (CITY) Ext. 4937.
Deadline for making the application:

In accordance with section 88.33 (3) and 88.35 (3) of the Act the application must be made within 90 days after the latest of the following dates:

1. The candidate or registered third party's filing date under section 88.30.
2. The date the candidate or registered third party filed a financial statement, if the statement was filed within 30 days after the applicable filing date under section 88.30.
3. The candidate or registered third party's supplementary filing date, if any, under section 88.30.
4. The date on which the candidate or registered third party's extension, if any, under subsection 88.23 (6) or 88.27 (3) expires.

Application to be filed in person, with the City Clerk at 308-300 Dufferin Avenue, London, Ontario.

Schedule "A"

William John Armstrong

Full legal name

Please outline the reasons for your belief. Use additional copies of this page as necessary, providing clear and specific information. If you refer to any documents please attach copies of those documents to this Schedule.

See attached documents
TO: 2018 MUNICIPAL ELECTION COMPLIANCE AUDIT COMMITTEE

RE: SHAWN LEWIS WARD 2 CAMPAIGN 2018 MUNICIPAL ELECTION

1. City of London Voter Information Meeting

Using his authority as President of the Argyle Community Association (the “A.C.A”), Shawn Lewis organized a voter information meeting on how to vote with ranked ballots. Shawn Lewis organized this meeting knowing he was announcing as a candidate the next day on April 25th, 2018. The meeting was held at Clarke Road Secondary School on April 24th, 2018. The cost of this meeting was expensed through the Clerk’s Office at the City of London. The City of London paid for staff time, meeting space, and educational election materials to facilitate the meeting. Shawn Lewis was the host and spoke to voters for the duration of the meeting, even though individuals organizing the meeting knew Shawn Lewis was registering as a candidate for the upcoming election. The day after the meeting was held, Shawn Lewis announced candidacy on April 25th, 2018. Furthermore, voter information, such as: names, phone numbers, emails, and addresses, were gathered by Shawn Lewis, and other A.C.A members. The voter information was collected while members of the public entered the meeting, and for the duration of the meeting. This meeting was organized by Shawn Lewis to give himself voter recognition. Cathy Saunders was notified by Bill Armstrong a day before the meeting had occurred, that having Shawn Lewis participate, and host the meeting would break election rules. Cathy Saunders still proceeded as planned, allowing Shawn Lewis to participate in the meeting and speak to voters. The actions of Shawn Lewis contravene the following sections of the Municipal Elections Act:

a. 88.12(4)(3) The Act states “For greater certainty, and without limiting the generality of subsection (3), the following shall not make a contribution: The Crown in right of Canada or Ontario, a municipality or local board. 2016, c. 15, s. 52.”.

b. 88.22(1)(e) The Act states “contributions of goods or services are valued;”.

Appendix ‘A’

Candidate’s Financial Statements – Form 4 Lewis

Appendix ‘L’

Voter Meeting Video
2. Commercial Property Billboard Advertisement

Shawn Lewis entered a service agreement and contract with a sign company outside of the election period. The contract was for the purchase of mobile campaign billboard advertisements. A city staff member confirmed the purchase was made outside of the election period. The company hired by Shawn Lewis also confirmed they had been ordered outside the election period. For the duration of the election Shawn Lewis installed four campaign billboard advertisements on commercial property. The properties are owned by various corporations. The locations provided a lucrative advertising opportunity for Shawn Lewis because of the high volume of automobile, and pedestrian traffic. Use of this property would not be allowed because a corporation cannot donate to a campaign. The use of this property, and exposure, had financial value. The billboard advertisements would not have regularly been permissible under election sign by-laws. The billboard sign was oversized for the space available on the city easement being so close to the roadways, which is why Shawn Lewis took advantage of the commercial property. We would ask the Chair and Members of the 2018 Municipal Election Compliance Audit Committee to assign a monetary value at their discretion. Regardless whether the corporations consented to the use of their property, it is established that a donation was made. The actions of Shawn Lewis contravened the following sections of the Municipal Elections Act:

a. 88.20(2) The Act states "An expense shall not be incurred by or under the direction of a candidate outside his or her election campaign period. 2016, c. 15, s. 58."

b. 88.2(4) The Act states "For greater certainty, and without limiting the generality of subsection (3), the following persons and entities shall not make a contribution: A corporation that carries on business in Ontario."

c. 88.22(1)(a) The Act states "no contributions of money are accepted or expenses are incurred unless one or more campaign accounts are first opened at a financial institution exclusively for the purposes of the election campaign;"

d. 88.22(1)(f) The Act states "contributions of goods or services are valued;"

Appendix 'A'
Candidate's Financial Statements – Form 4 Lewis

Appendix 'F'
Shawn Lewis Billboard Signs
3. Blackridge Campaign Support

In approximately early 2017 Shawn Lewis began campaigning for the 2018 municipal election. Shawn Lewis was working closely with Amir Farahi, Jake Skinner, and Patrick Sackville. The three individuals working with Shawn Lewis would later become the group known as London’s most controversial backroom political strategists. London Institute was the first formalized political strategist organization created by Amir Farahi et al, later the trio founded Blackridge Strategy. The campaign began when Shawn Lewis joined the A.C.A as a board member in April 2017, retaining the position of chairperson until April 2018. In August 2017 the London Institute was providing campaign staff training for Shawn Lewis. Attendees had full knowledge, and intention of working for the Shawn Lewis campaign. The cost to this training was $400 for each person in attendance. There are at least two members that have been identified from the Shawn Lewis campaign who attended. Furthermore, Shawn Lewis publicly stated that his campaign contracted Blackridge Strategy for election services, such as: polling, and pulling vote on election day. See appendix ‘C’ for Blackridge Strategy polling fee under the VanMeerbergen campaign. Paul VanMeerbergen hired Blackridge for polling in the 2018 London municipal election. Shawn Lewis used the same service, which would equal $3,390. The polling fee may not include pulling the vote on election day. It is unknown at this time whether more services were rendered, discounted, or provided as donations. Reviewing the election expenses filed for the Shawn Lewis campaign provides no mention of the Blackridge Strategy fee for any services. The actions of Shawn Lewis contravene the following section of the Municipal Elections Act:

a. 88.8(4) The Act states "For greater certainty, and without limiting the generality of subsection (3), the following persons and entities shall not make a contribution: A corporation that carries on business in Ontario."

b. 88.20(2) The Act states "An expense shall not be incurred by or under the direction of a candidate outside his or her election campaign period. 2016, c. 15, s. 58."

c. 88.22(1)(f) The Act states "contributions of goods or services are valued;".

Appendix ‘A’
Candidate’s Financial Statements – Form 4 Lewis

Appendix ‘C’
Candidate’s Financial Statements – Form 4 VanMeerbergen

Appendix ‘D’
Shawn Lewis Blackridge Confession

Appendix ‘I’
London Institute Campaign Training
4. Paolotto Campaign Donations and Shared Resources

The Paul Paolotto and Shawn Lewis campaigns shared resources throughout the election period. For example, a rented space with a tent and equipment at Ribfest on August 4, 2018. This location benefitted Shawn Lewis by providing exposure to foot traffic at Ribfest London 2018. The estimated amount to rent the location and tent is approximately $2,000. In the pictures provided it is clear that Shawn Lewis installed signs, distributed campaign literature, and met voters. Shawn Lewis also shared the use of rented office space with Paul Paolotto. There was shared campaign office space at 1625 Dundas St, London, Ontario NS 3C3. A meet the candidates free barbeque event was held at the Dundas location on September 11, 2018. Based on social media photos, and attendees on Facebook, there were between 100 and 200 attendees at the free barbeque event. Both candidates election signs were affixed to the building throughout the election, indicating that this was a shared office space. This campaign office provided a lucrative advertising opportunity for Shawn Lewis because of the high volume of automobile, and pedestrian traffic. The cost to rent this location was confirmed by the landlord listing, at 1,000sqft unit costing $12.00 per square feet. The total approximate monthly expense for this campaign office space would equal $1,356 HST included. The office space was used for the duration of the campaign, which would total over $4,068 HST included. Office space rental at the Dundas location would have to be pro-rated equally between the two candidates. To further show collusion between the Paolotto and Lewis campaigns there are a series of social media video endorsements posted on the Paolotto Facebook page. Paul Paolotto had interviewed Shawn Lewis under the guise of Shawn Lewis being the A.C.A President. However, Shawn Lewis and Paul Paolotto were fully aware that Shawn Lewis would be registering as a candidate the following week. Throughout the video Paolotto questions Lewis on issues facing ward 2 as if he were running for office. Professional video services were used to film and edit the video advertisement. Facebook tags were used to ensure the Shawn Lewis Facebook page ‘Shawn Lewis, London Politics’ was given exposure. In October 2018 there was also a joint press release at the London-Middlesex housing authority property. Paolotto provided Shawn Lewis with online advertising through social media postings. There is no indication of an expense or donation on the Shawn Lewis financial submission for any items mentioned. The actions of Shawn Lewis contravene the following section of the Municipal Elections Act:

a. 88.8(4) The Act states “For greater certainty, and without limiting the generality of subsection (3), the following persons and entities shall not make a contribution: A corporation that carries on business in Ontario.”.

b. 88.12(4)(2) The Act states “For greater certainty, and without limiting the generality of subsection (3), the following shall not make a contribution: A provincial political party, constituency association, registered candidate or leadership contestant registered under the Election Finances Act.

c. 88.22(1)(f) The Act states “contributions of goods or services are valued.”.

Appendix ‘A’
Candidate’s Financial Statements – Form 4 Lewis

Appendix ‘E’
Ribfest Booth
5. Election Signs

The Shawn Lewis campaign installed various signs from corporate donors (Rogers TV), the city of London (Respect the Limit), and third party advertisers (anti-BRT signs) before and during the campaign period. One of the first waves of campaigning came in the form of Rogers TV signs during August 2017. Shawn Lewis began installing lawn signs to promote his persona a year before the election. Shawn Lewis was host of the #LdnOnt Rogers TV show for two years, and never used lawn sign advertising prior to August 2017. Rogers TV signs promoting Shawn Lewis were installed on at least four homes that Shawn Lewis would later claim to be “campaign headquarters” in ward 2. Those same addresses that had Rogers TV signs installed in August 2017, would be switched to Shawn Lewis election sign locations in early June 2018. A Rogers executive was contacted regarding lawn signs for promotional advertisements. The executive confirmed that there was no marketing initiatives of this type for local London programming. The city of London facilitated a Respect The Limit lawn sign program. Respect The Limit signs were used by the Shawn Lewis campaign to befriend voters, before and during the campaign period. In fact, the City of London cancelled Respect The Limit because candidates were found to be abusing the program. Bill Armstrong had contacted Cathy Saunders to complain about the Shawn Lewis Campaign using Respect The Limit for campaigning. Shawn Lewis explained to Cathy Saunders that the A.C.A was responsible for distribution of the Respect The Limit signs. However, there are social media posts that show Shawn Lewis distributed the Respect The Limit signs. Numerous residents of ward 2 were interviewed, and confirmed Shawn Lewis approached them with Respect The Limit signs. Names and Addresses of witnesses will be provided on a confidential basis upon request. An unregistered third party was promoting cancellation of the Bus Rapid Transit (BRT) program. The group was distributing lawn signs during the 2018 London municipal election. The Shawn Lewis campaign assisted with distributing third party advertising throughout the campaign. Anti-BRT lawn signs were used to befriend voters at the door by Shawn Lewis. Numerous residents of ward 2 were interviewed, and confirmed Shawn Lewis approached them with Anti-BRT signs. Names and Addresses of witnesses will be provided on a confidential basis upon request. There is also the issue of election sign placement before the allowed date of July 27, 2018. Shawn Lewis had installed lawn signs in early June of 2018. Bill Armstrong submitted a complaint to the City Clerk, at which point Shawn Lewis replied to Cathy Saunders that the signage was installed on “election headquarters”. All the signs did not comply with the requirement that they be attached to the headquarters building structure. Campaign headquarters must be registered with the Election Office at the City of London. The alleged four “campaign headquarters” were not registered on the city election website. The actions of Shawn Lewis contravene the following section of the Municipal Elections Act:

a. 88.20(2) The Act states “An expense shall not be incurred by or under the direction of a candidate outside his or her election campaign period. 2016, c. 15, s. 58.”

b. 88.22(1)(a) The Act states “no contributions of money are accepted or expenses are incurred unless one or more campaign accounts are first opened at a financial institution exclusively for the purposes of the election campaign;”.

c. 88.22(1)(f) The Act states “contributions of goods or services are valued;”.
d. 88.12(4)(3) The Act states "For greater certainty, and without limiting the generality of subsection (3), the following shall not make a contribution: The Crown in right of Canada or Ontario, a municipality or local board. 2016, c. 15, s. 52.".

e. 88.8(4) The Act states "For greater certainty, and without limiting the generality of subsection (3), the following persons and entities shall not make a contribution: A corporation that carries on business in Ontario."

Appendix 'A'
Candidate's Financial Statements – Form 4 Lewis

Appendix 'H'
Respect The Limit Signs

Appendix 'G'
Campaign Headquarters

Appendix 'H'
Respect The Limit Signs

6. Online Advertising and Website
   ShawnLewis.ca was used during and before the campaign period as a way for Shawn Lewis to promote himself for the 2018 municipal election. The same website was used during the 2014 election as a campaign website. Money and donations were collected on this website prior to the election, under the terms that money collected was being used for Freedom of Information requests at London City Hall. ShawnLewis.ca continues to be solely used for political campaign purposes. During the 2018 London election Cathy Saunders cautioned candidates, specifically Paolotto ("The Paolotto Report") and Paul Cheng to stop election promotion through their respective websites prior to the campaign period. Cathy Saunders cautioned candidates because they knowingly promoted themselves as political figures, while having intentions to run in the city election. The use of this website for political campaigning occurred prior to Shawn Lewis becoming a candidate, and prior to the allowable campaign period. The actions of Shawn Lewis contravene the following section of the Municipal Elections Act:

a. 88.20(2) The Act states "An expense shall not be incurred by or under the direction of a candidate outside his or her election campaign period. 2016, c. 15, s. 58."

b. 88.22(1)(a) The Act states "no contributions of money are accepted or expenses are incurred unless one or more campaign accounts are first opened at a financial institution exclusively for the purposes of the election campaign;".

c. 88.22(1)(f) The Act states "contributions of goods or services are valued;".

Appendix 'A'
Candidate's Financial Statements – Form 4 Lewis
7. Thames Valley School Board Donation

Shawn Lewis used school board property and equipment at Lord Nelson on September 27, 2018. No other candidate had the opportunity to advertise their campaign at this event. Election literature was distributed while meeting voters. Also, signage was installed at the booth that Shawn Lewis occupied. The candidate was present during these events to garner support from voters attending. It is unknown at this time what the value of the donation to rent these locations would cost. To rent a similar location at a private venue would equal between $300 and $400 per event. The actions of Shawn Lewis contravene the following section of the Municipal Elections Act:

a. 88.12(4)(3) The Act states "For greater certainty, and without limiting the generality of subsection (3), the following shall not make a contribution: The Crown in right of Canada or Ontario, a municipality or local board. 2016, c. 15, s. 52."

b. 88.22(1)(e) The Act states "contributions of goods or services are valued;".

Appendix 'A'
Candidate's Financial Statements – Form 4 Lewis

Appendix 'J'
Lord Nelson Community Event

8. Additional Campaign Expenses

There are numerous campaign expenses that warrant further audit. It is unknown at this time whether further investigation will uncover additional non-disclosure of expenses. A roster of candidates had used Blackridge Strategy for various services, such as: website creation, marketing, polling, pulling vote, smear campaigns, etc. Furthermore, there are skilled professionals who provided services to the Shawn Lewis campaign at no cost. The skilled work should be considered a gift in kind donation, due to the quality and skill needed to complete the projects assigned.

Appendix 'B'
LF Press Article – "Many anti-BRT candidates using same London PR firm"

8. Shawn Lewis Profile Summary

The claim of lack of knowledge pertaining to election regulations could not be valid. Shawn Lewis has over a decade of election campaign experience, and has worked on campaigns on all three levels of government. Shawn Lewis is well versed in all regulations for the different levels of government. He has participated in elections in many different roles, including: campaign manager, campaign advisor, and candidate.

9. Confidential Evidence Submission

Names of witnesses can be provided on a confidential basis to provide insight on these issues. However, we are not providing at this time in order to protect their identities.

Bill Armstrong

Date: June 27, 2019
Appendix 'A'
Candidate's Financial Statements – Form 4 Lewis
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 accept contributions or incur expenses must complete Boxes C, D, Schedule 1 and Schedule 2 in accordance with these instructions. Candidates who accept 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 paid immediately over to the clan who is responsible for the conduct of the election.

Per the campaign period from (day candidate filed nomination) to (day candidate filed nomination) (MM/DD/YYYY)

☑ Initial filing reflecting finances to December 31 (or 45 days after voting day in a by-election)
☒ Supplementary filing including finances after December 31 (or 45 days after voting day in a by-election)

Box A: Name of Candidate and Office
Candidate’s name as shown on the ballot
LEWIS
Last Name or Single Name
Given Name(s)
SHAWN
Office for which the candidate sought election
CITY COUNCILLOR
Ward name or no. (if any)
2
Municipality
LONDON

Spending Limit - General
$20,037.80
Spending Limit - Parties and Other Expressions of Appreciation
$2,003.68

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

Box B: Declaration

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

Signature of Candidate

Date (yyyy/mm/dd)
2015/12/14

Date Filed (yyyy/mm/dd)
Dec 14/15
Time Filed
12:43 pm

Initial of Candidate or Agent (if filed in person)

Signature of Clerk or Designate

SARAH CORNELL, Clerk of the Corporation of the City of London.
### 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) + $22,909.50
- Revenue from items $25 or less + $  
- Sign deposits refund + $  
- Revenue from fundraising events not deemed a contribution (from Part III of Schedule 2) + $  
- Interest earned by campaign bank account + $  
- Other (provide full details) + $  

Total Campaign Income (Do not include loan) + $22,909.60 c1

#### EXPENSES (Note: Include the value of contributions of goods and services)
Expenses subject to general spending limit

<table>
<thead>
<tr>
<th>Item Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inventory from previous campaign used in this campaign (list details in Table 4 of Schedule 1)</td>
<td>$568.00</td>
</tr>
<tr>
<td>Advertising</td>
<td>$997.41</td>
</tr>
<tr>
<td>Brochures/flyers</td>
<td>$2,971.61</td>
</tr>
<tr>
<td>Signs (including sign deposit)</td>
<td>$10,019.07</td>
</tr>
<tr>
<td>Meetings hosted</td>
<td>$303.96</td>
</tr>
<tr>
<td>Office expenses incurred until voting day</td>
<td>$2,267.13</td>
</tr>
<tr>
<td>Phone and/or internet expenses incurred until voting day</td>
<td>$1,008.08</td>
</tr>
<tr>
<td>Salaries, benefits, honoraria, professional fees incurred until voting day</td>
<td>$300.40</td>
</tr>
<tr>
<td>Bank charges incurred until voting day</td>
<td>$131.92</td>
</tr>
<tr>
<td>Interest charged on loan until voting day</td>
<td>$</td>
</tr>
<tr>
<td>Other (provide full details)</td>
<td>$</td>
</tr>
</tbody>
</table>

Total Expenses subject to general spending limit + $19,092.82 c2

#### EXPENSES
Expenses subject to spending limit for parties and other expressions of appreciation

<table>
<thead>
<tr>
<th>Item Description</th>
<th>Amount</th>
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<tbody>
<tr>
<td>VOLUNTEER VICTORY PARTY</td>
<td>$1,508.65</td>
</tr>
<tr>
<td>COMMUNITY THANK YOU CANDY FOR SANTA CLAUS PARA</td>
<td>$71.76</td>
</tr>
<tr>
<td></td>
<td>$</td>
</tr>
<tr>
<td></td>
<td>$</td>
</tr>
<tr>
<td></td>
<td>$</td>
</tr>
<tr>
<td>Total Expenses subject to spending limit for parties and other expressions of appreciation</td>
<td>$1,580.41 c3</td>
</tr>
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9030P (2018.4)
### Expenses not subject to spending limits

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount ($)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accounting and audit</td>
<td>+ $665.00</td>
</tr>
<tr>
<td>Cost of fundraising events/activities (not details in Part IV of Schedule 2)</td>
<td>+ $</td>
</tr>
<tr>
<td>Office expenses incurred after voting day</td>
<td>+ $</td>
</tr>
<tr>
<td>Salaries, benefits, honoraria, professional fees incurred after voting day</td>
<td>+ $</td>
</tr>
<tr>
<td>Bank charges incurred after voting day</td>
<td>+ $ 42.50</td>
</tr>
<tr>
<td>Interest charged on loan after voting day</td>
<td>+ $</td>
</tr>
<tr>
<td>Expenses related to recount</td>
<td>+ $</td>
</tr>
<tr>
<td>Expenses related to controversy election</td>
<td>+ $</td>
</tr>
<tr>
<td>Expenses related to compliance audit</td>
<td>+ $</td>
</tr>
<tr>
<td>Expenses related to candidate's disability (provide full details)</td>
<td>+ $</td>
</tr>
<tr>
<td>1.</td>
<td>+ $</td>
</tr>
<tr>
<td>2.</td>
<td>+ $</td>
</tr>
<tr>
<td>3.</td>
<td>+ $</td>
</tr>
<tr>
<td>4.</td>
<td>+ $</td>
</tr>
<tr>
<td>5.</td>
<td>+ $</td>
</tr>
<tr>
<td>Other (provide full details)</td>
<td>+ $</td>
</tr>
<tr>
<td>1.</td>
<td>+ $</td>
</tr>
<tr>
<td>2.</td>
<td>+ $</td>
</tr>
<tr>
<td>3.</td>
<td>+ $</td>
</tr>
<tr>
<td>4.</td>
<td>+ $</td>
</tr>
<tr>
<td>5.</td>
<td>+ $</td>
</tr>
<tr>
<td><strong>Total Expenses not subject to spending limits</strong></td>
<td>+ $607.50</td>
</tr>
</tbody>
</table>

**Total Campaign Expenses (C3 + C1 + C4) = $21,280.73**

### Box D: Calculation of Surplus or Deficit

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount ($)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Excess (deficiency) of income over expenses (Income minus Total Expenses)</td>
<td>+ $1,628.77</td>
</tr>
<tr>
<td>(C1 - C5)</td>
<td></td>
</tr>
<tr>
<td>Eligible deficit carried forward by the candidate from the last election</td>
<td>- $</td>
</tr>
<tr>
<td>(applies to 2018 regular election only)</td>
<td></td>
</tr>
<tr>
<td>Total (D1 - D2)</td>
<td>= $1,628.77</td>
</tr>
<tr>
<td>If there is a surplus, deduct any refund of candidate's or spouse's</td>
<td>- $1,628.77</td>
</tr>
<tr>
<td>contributions to the campaign</td>
<td></td>
</tr>
<tr>
<td>Surplus (or deficit) for the campaign</td>
<td>= $</td>
</tr>
</tbody>
</table>

If line D3 shows a surplus, the amount must be paid in trust, at the time the financial statements are filed, to the municipal clerk who is responsible for the conduct of the election.
### Schedule 1 - Contributions

**Part I - Summary of Contributions**

- Contributions in money from candidate and spouse (include value listed in Table 3 and Table 4)
  - $2,200.00
  - $588.00
- Total value of contributions not exceeding $100 per contributor
  - $4,521.50
- Total value of contributions exceeding $100 per contributor (from line 1B on page 5; list details in Table 1 and Table 2)
  - $15,600.00

**Less:** Contributions returned or payable to the contributor.

- Contributions paid or payable to the clerk, including contributions from anonymous sources exceeding $25

- $22,999.50

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

- $15,600.00

### Part II - Contributions exceeding $100 per contributor – individuals other than candidate or spouse

#### Table 1: Monetarily contributions from individuals other than candidate or spouse

<table>
<thead>
<tr>
<th>Name</th>
<th>Full Address</th>
<th>Date Received</th>
<th>Amount Received</th>
<th>Amount $ Returned to Contributor or Paid to Clerk</th>
</tr>
</thead>
<tbody>
<tr>
<td>SEE ATTACHED LISTING</td>
<td></td>
<td></td>
<td>$15,600.00</td>
<td></td>
</tr>
</tbody>
</table>

Additional information is listed on separate supplementary attachment. Total $15,600.00
Table 2: Contributions in goods or services from individuals other than candidate or spouse
(Note: must also be recorded as Expenses in Box C)

<table>
<thead>
<tr>
<th>Name</th>
<th>Full Address</th>
<th>Description of Goods or Services</th>
<th>Date Received (yyyy/mm/dd)</th>
<th>Value $</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>

☐ Additional information is listed on separate supplementary attachment

Total

Total for Part II - Contributions exceeding $100 per contributor
(Add totals from Table 1 and Table 2 and record the total in Part 1 - Summary of Contributions)

$ 15,000.00

Part III - Contributions from candidate or spouse

Table 3: Contributions in goods or services

<table>
<thead>
<tr>
<th>Description of Goods or Services</th>
<th>Date Received (yyyy/mm/dd)</th>
<th>Value $</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inventory</td>
<td>2018/05/01</td>
<td>588.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
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<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Description of Goods or Services</td>
<td>Date Received (yyyy/mm/dd)</td>
<td>Value</td>
</tr>
<tr>
<td>----------------------------------</td>
<td>-----------------------------</td>
<td>-------</td>
</tr>
<tr>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Additional information is listed on separate supplementary attachment</td>
<td>Total</td>
<td>1,776.00</td>
</tr>
</tbody>
</table>

Table 6: Inventory of campaign goods and materials from previous municipal campaign used in this campaign (Note: value must be recorded as a contribution from the candidate and as an expense)

<table>
<thead>
<tr>
<th>Description</th>
<th>Date Acquired (yyyy/mm/dd)</th>
<th>Supplier</th>
<th>Quantity</th>
<th>Current Market Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>T-BAR 6'</td>
<td>2014/01/09</td>
<td>TSC STORES</td>
<td>30</td>
<td>338.00</td>
</tr>
<tr>
<td>WOODEN POSTS</td>
<td>2014/11/01</td>
<td>TANYA PARK</td>
<td>50</td>
<td>50.00</td>
</tr>
<tr>
<td>WOODEN POSTS</td>
<td>2015/10/01</td>
<td>SHAWN LEWIS</td>
<td>20</td>
<td>20.00</td>
</tr>
<tr>
<td>T-BAR 6' USED</td>
<td>2015/10/01</td>
<td>SHAWN LEWIS</td>
<td>30</td>
<td>180.00</td>
</tr>
</tbody>
</table>

Additional information is listed on separate supplementary attachment | Total | 588.00 |
## Schedule 2 - Fundraising Events and Activities

**Fundraising Event/Activity**
Complete a separate schedule for each event or activity held

- [ ] Additional schedule(s) attached

**Description of fundraising event/activity**

**Date of event/activity (yyyy/mm/dd)**

**Part I - Ticket revenue**

- Admission charge (per person) (If there are a range of ticket prices, attach complete breakdown of all ticket sales)

<table>
<thead>
<tr>
<th>Number of tickets sold</th>
<th>3</th>
<th>2A</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>x</td>
<td>2B</td>
</tr>
</tbody>
</table>

Total Part I (3A X 2B) (Include in Part 1 of Schedule 1) = $

**Part II - Other revenue deemed a contribution**
(e.g., revenue from goods sold in excess of fair market value)

Provide details:

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>$</td>
</tr>
<tr>
<td>2</td>
<td>$</td>
</tr>
<tr>
<td>3</td>
<td>$</td>
</tr>
<tr>
<td>4</td>
<td>$</td>
</tr>
<tr>
<td>5</td>
<td>$</td>
</tr>
</tbody>
</table>

Total Part II (Include in Part 1 of Schedule 1) = $

**Part III - Other revenue not deemed a contribution**
(e.g., contribution of $25 or less, goods or services sold for $25 or less)

Provide details:

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>$</td>
</tr>
<tr>
<td>2</td>
<td>$</td>
</tr>
<tr>
<td>3</td>
<td>$</td>
</tr>
<tr>
<td>4</td>
<td>$</td>
</tr>
<tr>
<td>5</td>
<td>$</td>
</tr>
</tbody>
</table>

Total Part III (Include under Income in Box C) = $

**Part IV - Expenses related to fundraising event or activity**

Provide details:

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>$</td>
</tr>
<tr>
<td>2</td>
<td>$</td>
</tr>
<tr>
<td>3</td>
<td>$</td>
</tr>
<tr>
<td>4</td>
<td>$</td>
</tr>
<tr>
<td>5</td>
<td>$</td>
</tr>
<tr>
<td>6</td>
<td>$</td>
</tr>
<tr>
<td>7</td>
<td>$</td>
</tr>
<tr>
<td>8</td>
<td>$</td>
</tr>
</tbody>
</table>

Total Part IV Expenses (Include under Expenses in Box C) = $

---

$523P (2018064)
Auditor’s Report
Municipal Elections Act, 1996 (Section 88.25)

A candidate who has received contributions or incurred expenses in excess of $10,000 must attach an auditor’s report.

<table>
<thead>
<tr>
<th>Professional Designation of Auditor</th>
</tr>
</thead>
<tbody>
<tr>
<td>CPA, CA, LPA</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Municipality</th>
<th>Date (yyyy/mm/dd)</th>
</tr>
</thead>
<tbody>
<tr>
<td>London, Ontario</td>
<td>2018/12/12</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Last Name or Single Name</td>
</tr>
<tr>
<td>White</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suite/Unit No, 1708</td>
</tr>
<tr>
<td>Street No, 405</td>
</tr>
<tr>
<td>Street Name, WATERLOO</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Municipality</th>
<th>Province</th>
<th>Postal Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>LONDON</td>
<td>ONTARIO</td>
<td>N6H 3R7</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Telephone no. (including area code)</th>
<th>Email Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>519 319-5467</td>
<td><a href="mailto:amy@amykwhite.ca">amy@amykwhite.ca</a></td>
</tr>
</tbody>
</table>

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

☑ Report is attached

Personal information, if any, collected on this form is obtained under the authority of sections 88.25 and 65 of the Municipal Elections Act, 1996. Under section 66 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.

S903P (201804)
## Table 1: Monetary contributions from individuals other than candidate or spouse

<table>
<thead>
<tr>
<th>Last Name</th>
<th>First Name</th>
<th>Address</th>
<th>Date Received</th>
<th>Contributed ($)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shank</td>
<td>David</td>
<td>11 Quay St Englewood ON N5C 4G7</td>
<td>1-May</td>
<td>250.00</td>
</tr>
<tr>
<td>Miller</td>
<td>Cheryl</td>
<td>351 Millbank Dr London ON</td>
<td>1-May</td>
<td>750.00</td>
</tr>
<tr>
<td>Marlan</td>
<td>Matthew</td>
<td>55 Degrade Cres London ON N5W 3V7</td>
<td>5-May</td>
<td>1,000.00</td>
</tr>
<tr>
<td>Lewis</td>
<td>Wendy</td>
<td>100 York St Drexon ON N0P 2MD</td>
<td>5-May</td>
<td>200.00</td>
</tr>
<tr>
<td>Mathiesen</td>
<td>Irene</td>
<td>21838 Bear Creek Rd R11 Edson ON N0J 2A0</td>
<td>5-May</td>
<td>200.00</td>
</tr>
<tr>
<td>Coulier</td>
<td>Scott</td>
<td>67 Highland Court, London ON</td>
<td>4-May</td>
<td>500.00</td>
</tr>
<tr>
<td>Reimer</td>
<td>Mark</td>
<td>972 Halford St London ON N5J 2M4</td>
<td>10-May</td>
<td>250.00</td>
</tr>
<tr>
<td>Sutherland</td>
<td>Gus</td>
<td>65 Bloomsbury London ON</td>
<td>11-May</td>
<td>1,500.00</td>
</tr>
<tr>
<td>Farah</td>
<td>Amir</td>
<td>333-717 Richmond St London ON N5A 3H1</td>
<td>10-May</td>
<td>250.00</td>
</tr>
<tr>
<td>Monufafa</td>
<td>Hassan</td>
<td>337 Legace Drive</td>
<td>21-May</td>
<td>1,000.00</td>
</tr>
<tr>
<td>Smith</td>
<td>Michael</td>
<td>2109 Heather Rd London ON N5Y 2X8</td>
<td>15-May</td>
<td>200.00</td>
</tr>
<tr>
<td>Malanville</td>
<td>Jan (Etransfer)</td>
<td>24 Malby Pl London ON</td>
<td>22-May</td>
<td>200.00</td>
</tr>
<tr>
<td>Gluss</td>
<td>Ryan</td>
<td>53 Queen Mary Crescent, London ON N6H4B5</td>
<td>29-May</td>
<td>200.00</td>
</tr>
<tr>
<td>Carson</td>
<td>Mike</td>
<td>85 Glass Ave London ON</td>
<td>13-Jun</td>
<td>250.00</td>
</tr>
<tr>
<td>Ginty</td>
<td>Sarah</td>
<td>1873 Cora Rd R13, Blenheim</td>
<td>27-Jun</td>
<td>300.00</td>
</tr>
<tr>
<td>Dustin</td>
<td>Christopher</td>
<td>207-15 Grand Ave London ON N6C 1L3</td>
<td>3-Jul</td>
<td>200.00</td>
</tr>
<tr>
<td>Talman</td>
<td>Peter</td>
<td>20 Mumping St, Toronto ON M4Y 1K7</td>
<td>23-Jul</td>
<td>200.00</td>
</tr>
<tr>
<td>Oser</td>
<td>Stephen</td>
<td>601 Ross St London ON</td>
<td>4-Aug</td>
<td>1,000.00</td>
</tr>
<tr>
<td>Hardy</td>
<td>Chuck</td>
<td>31 Caprice Cres</td>
<td>14-Aug</td>
<td>250.00</td>
</tr>
<tr>
<td>Van Lueeven</td>
<td>Vivian</td>
<td>467 Elmridge Dr</td>
<td>29-Aug</td>
<td>250.00</td>
</tr>
<tr>
<td>Lewis</td>
<td>Wendy</td>
<td>6-306 Park Ave, Drexon ON</td>
<td>5-Sep</td>
<td>200.00</td>
</tr>
<tr>
<td>Maynard</td>
<td>Stephen</td>
<td>125 Limerick Ave Kanata ON</td>
<td>19-Sep</td>
<td>500.00</td>
</tr>
<tr>
<td>Striplon</td>
<td>Stephen</td>
<td>23311 Ninefoot Rd Thorsdale ON, N0M 2P0</td>
<td>1-Oct</td>
<td>500.00</td>
</tr>
<tr>
<td>Omer</td>
<td>Ismail</td>
<td>2143 Callingham Dr London ON N5G 3M2</td>
<td>28-Sep</td>
<td>750.00</td>
</tr>
<tr>
<td>Memine</td>
<td>Antonio</td>
<td>100 Annie Rd Thornhill ON L4A5G</td>
<td>15-Oct</td>
<td>450.00</td>
</tr>
<tr>
<td>White</td>
<td>Lea</td>
<td>77-606 50 Ave ON 757165</td>
<td>3-Oct</td>
<td>400.00</td>
</tr>
<tr>
<td>Craig</td>
<td>Christopher</td>
<td>210 Fridgeon Cres London ON, N6K3R6</td>
<td>15-Oct</td>
<td>400.00</td>
</tr>
<tr>
<td>McMelllard</td>
<td>Tyler</td>
<td>4888 Lakeshore Blvd Burlington ON L7R 1B2</td>
<td>15-Oct</td>
<td>250.00</td>
</tr>
<tr>
<td>Somers</td>
<td>Rick</td>
<td>23-1800 Sumner Way London N6G0C1</td>
<td>15-Oct</td>
<td>600.00</td>
</tr>
<tr>
<td>Ellis</td>
<td>Bilal</td>
<td>1102 Cherry Grove Dr London ON N6K 5B2</td>
<td>12-Oct</td>
<td>1,200.00</td>
</tr>
<tr>
<td>Johnson</td>
<td>Michael</td>
<td>63929 69th Rd Komoka ON, N0L3R0</td>
<td>17-Oct</td>
<td>200.00</td>
</tr>
<tr>
<td>Hamilton</td>
<td>Jarred</td>
<td>504 Cultus Ave, London ON N6G5F1</td>
<td>17-Oct</td>
<td>130.00</td>
</tr>
<tr>
<td>Fisher</td>
<td>Patrick</td>
<td>1579 Wessel Dr, London ON N6K4R1</td>
<td>17-Oct</td>
<td>130.00</td>
</tr>
<tr>
<td>Soulen</td>
<td>Kareem</td>
<td>303 Ithawnd St, Suite 203, London</td>
<td>20-Oct</td>
<td>1,200.00</td>
</tr>
</tbody>
</table>

**Total** | 15,609.00 |
INDEPENDENT AUDITOR'S REPORT

To Cathy Saunders, City Clerk, City of London

I have audited the accompanying Financial Statement – Auditor's Report Candidate – Form 4 ("Financial Statement") of Shawn Lewit ("Candidate"), which comprise the Statement of Campaign Income and Expenses, Calculation of Surplus or Deficit, and related schedules for the period May 1, 2018 to December 31, 2018. The Financial Statement has been prepared by the candidate based on Section 8B of the Municipal Elections Act, 1996.

CANDIDATE'S RESPONSIBILITY FOR THE FINANCIAL STATEMENT

The candidate is responsible for the preparation of the Financial Statement in accordance with Section 8B of the Municipal Elections Act, 1996 and for such internal control as the candidate determines is necessary to enable the preparation of a Financial Statement that is free from material misstatement, whether due to fraud or error.

AUDITOR'S RESPONSIBILITY

My responsibility is to express an opinion on the Financial Statement based on my audit. I conducted my audit in accordance with Canadian generally accepted auditing standards. Those standards require that I comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the Financial Statement is free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the Financial Statement. The procedures selected depend on the auditor's judgement, including the assessment of the risks of material misstatement of the financial Statement, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the candidate’s preparation of the Financial Statement in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the candidate’s internal control. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates made by the candidate, if any, as well as evaluating the overall presentation of the Financial Statement.

I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my qualified audit opinion.
BASIS FOR QUALIFIED OPINION

Due to the nature of the types of transactions inherent in an election campaign, the completeness of donations of goods and services and receipts and disbursements is not susceptible to satisfactory audit verification. Accordingly, my verification of these transactions was limited to the amounts recorded in the accounting records of the candidate, and I was not able to determine whether any adjustments might be necessary to income and expenses and surplus (deficit).

QUALIFIED OPINION

In my opinion, except for the possible effects of the matter described in the Basis for Qualified Opinion paragraph, the Financial Statement of the candidate for the period from May 1, 2018 to December 31, 2018 (relating to the election held on October 22, 2018) is prepared, in all material respects, in accordance with Section 88 of the Municipal Elections Act, 1996.

BASIS OF ACCOUNTING AND RESTRICTION ON DISTRIBUTION AND USE

The Financial Statement is prepared to assist the candidate to meet the requirements of Section 88 of the Municipal Elections Act, 1996. As a result, the Financial Statement may not be suitable for another purpose. My report is intended solely for the candidate and Cathy Sanders, City Clerk, City of London and should not be distributed to or used by parties other than the candidate and the Ministry of Municipal Affairs and Housing.

December 12, 2018
London, ON

Authorized to practice public accounting by the Chartered Professional Accountants of Ontario
Appendix 'B'

LF Press Article – "Many anti-BRT candidates using same London PR firm"
Many anti-BRT candidates using same London PR firm

One candidate in at least half of London’s 14 electoral wards is campaigning with behind-the-scenes help from the same local public affairs firm, most on a platform against the city’s contentuous bus rapid transit plan.

MEGAN STACEY (HTTPS://LFPRESS.COM/AUTHOR/MSTACEYPRESSMEDIA) Updated October 6, 2018

GALLERY:
CANDIDATES USING SAME LONDON PR FIRM
(https://lfpress.com/gallery/candidates-using-black-ridge)
One candidate in at least half of London's 14 electoral wards is campaigning with behind-the-scenes help from the same local public affairs firm, most on a platform against the city's contentious bus rapid transit plan.

Three of the ward candidates working with Blackridge Strategy Inc., a London company formed earlier this year, are using the same social media posts to question the $500-million BRT plan – including similar versions of an image that matches the header of a newly-created anti-BRT website, stopbort.com (http://stopbort.com/).

Of the seven, the lone ward candidate who has not come out against the transit plan, Ward 7 incumbent Josh Morgan, has declared a conflict on almost all BRT-related votes because he works for Western University. He rejected the idea of any connections between candidates.

"I have an independent contract with them for the services I'm contracting them for," he said of Blackridge. "I, and my campaign, have control."

The kind of political consulting Blackridge, which also is managing a website for mayoral candidate Ed Holder, offers its clients is common in elections at all levels.

But seeing the work of one company in so many campaigns is unusual in London and suggests at least ties between groups with shared opposition to the city's largest-ever infrastructure project, one expert said.

(https://postmediafiles.wordpress.com/2018/10/localwebsite-e1538785644802.jpg)

"There obviously seems to be some kind of behind-the-scenes links going on, and people of a particular bent are aware of them and are taking advantage of them," Joseph Lyons, the head of Western University's local government program, said of Blackridge.

He suggested it could be a way to advertise and mobilize against BRT.
Fight Poverty

The lack of opportunities and social problems mean low employment, lack of education, and poverty are serious issues. People are homeless without proper care. Municipal and provincial governments are responsible for helping the homeless by providing food banks and other assistance to help people get back on their feet. They should work with local businesses to create new opportunities, and socially inclusive housing projects in areas where the homeless are often found. This council also needs to combat homelessness by providing proper training, support, and shelter for homeless people. We need to focus on affordable housing, which is affordable for everyone to build to help young people in their careers, and ensure that the cheap price for London’s future growth is developed.

(https://postmediafiles.wordpress.com/2018/10/powellwebsite-e1538785644802.png)

“You think of the logic behind a third-party advertiser: You have a clear position on an issue that you want to get out there, to get publicized, but you can’t have direct connections with campaigns. It’s kind of a back-door way of doing that, creating a political consultancy firm that can co-ordinate between candidates as a function of the service that they provide.”

There’s little information available about Blackridge online, and the company’s website contains no details about its services or staff.

Six candidates and another source say one or the other or both of Amir Farahi, a one-time council candidate, and school board trustee Jake Skinner, who’s running for re-election, are at the helm of their municipal campaign work through Blackridge.

Neither answered repeated Free Press requests for comment this week.

Skinner, a Thames Valley District school board trustee, had been running for the Progressive Conservative nomination in London West ahead of the June provincial election, before Doug Ford took over as party leader and appointed former broadcaster Andrew Lawton to run instead.

Mayoral candidate Holder meets with Blackridge staff regularly to manage his website and related e-mail blasts, but not for political advice, his campaign team says.

“We’re not connected with the other candidates. We have a confidentiality agreement in place with Blackridge,” said Michael Meagher, handling
communications for Holder’s campaign.

Incumbents Phil Squire and Morgan said they’re using the firm for help with their websites, graphic design photos and some political guidance.

(https://postmediaffpress.files.wordpress.com/2018/10/reidwebsite-e1538785516311.png)

Matt Reid
For Ward 6

- First Warder “ready” University-Windsor Student Commissions
- Former Governor-At-Large, University’s Board of Governors
- Chair, Business Affairs Committee, Thames Valley (Sault) School Board
- Canadian Bar Association
- Greater Sarnia-Lambton Chamber of Commerce
- Windsor Law Association
- Former Executive Director of the London Chamber of Commerce

(https://postmediaffpress.files.wordpress.com/2018/10/reidwebsite-e1538785516311.png)

Of the three candidates who use anti-BRT Facebook posts styled and themed similarly to each other and one used on stopbort.com (http://stopbort.com/), Randy Warden in Ward 5 and Steve Hillier in Ward 14 confirmed they’re working with Blackridge.

The website of Ward 11 candidate Rachel Powell – which matches those of most other municipal Blackridge clients – had shown it was “built by Blackridge Strategy” before the tag was removed recently, but she did not directly confirm her relationship with the company.

London lawyer Michael Lerner, spokesperson for stopbort.com (http://stopbort.com/), did not respond to a request for comment about the connection between the images. Stopbort.com (http://stopbort.com/) is a new anti-BRT group that’s distributing lawn signs protesting the $500-million project.

All the candidates who responded to The Free Press stressed Blackridge isn’t running their campaigns, but is supplying materials and offering “advice.”

“Although I have run once before, I still see myself as a novice,” Warden said.
Squire described Blackridge’s services as “one-stop shopping,” convenient for a busy campaign.

“I wouldn’t know how to make up a website if it jumped down my throat,” he said.

mstacey@postmedia.com (mailto:mstacey@postmedia.com)
twitter.com/MeganatLFPress (https://twitter.com/MeganatLFPress)

WHAT BLACKRIDGE DOES

Website development: Blackridge uses Nation Builder, a common digital platform, to build websites and co-ordinate mailings to subscribers, among other features.

Political strategy: Media and SWOT (strengths, weaknesses, opportunities, threats) analyses, political advice and insight.

Graphic design: Social media posts, ads, flyers, signs.

Multimedia: Photos, videos.

CAMPAIGNS INVOLVED WITH BLACKRIDGE

Mayoral candidate Ed Holder’s website is managed by Blackridge. That website management includes regular meetings with Blackridge.

Ward 5 candidate Randy Warden uses Blackridge for campaign materials such as signs and flyers, social media posts and a website, and gets political advice from Skinner. He’s running anti-BRT social media posts that have the same design as those used by Powell and Hillier.

Ward 6 candidate Phil Squire uses Blackridge for campaign materials such as signs and flyers, his website, and he works with Skinner.

Ward 7 candidate Josh Morgan contracted Blackridge to do his website, photos, graphic design, a media analysis and SWOT (strengths, weaknesses, opportunities, threats) review of his campaign.

Ward 8 candidate Matt Reid’s website had shown it was “built by Blackridge Strategy” before the tag was removed recently.
Ward 10 candidate Paul Van Meerbergen is relying on digital and technical support from Blackridge, including help with his website and online presence.

Ward 11 candidate Rachel Powell has a campaign website that had shown it was “built by Blackridge,” and uses anti-BRT social media posts that have the same design as those used by Warden and Hillier.

Ward 14 candidate Steve Hillier tapped Blackridge for political advice, signs, and his website. He uses anti-BRT social media posts that have the same design as those used by Warden and Powell.

RELATED


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Appendix ‘C’
Candidate’s Financial Statements – Form 4 VanMeerbergen
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 paid immediately over to the clerk who is responsible for the conduct of the election.

<table>
<thead>
<tr>
<th>YYYY</th>
<th>MM</th>
<th>DD</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018</td>
<td>01</td>
<td>8</td>
</tr>
<tr>
<td></td>
<td>07</td>
<td>27</td>
</tr>
<tr>
<td>YYYY</td>
<td>MM</td>
<td>DD</td>
</tr>
<tr>
<td>2018</td>
<td>01</td>
<td>6</td>
</tr>
<tr>
<td></td>
<td>12</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1</td>
</tr>
</tbody>
</table>

1. Initial filing reflecting finances to December 31 (or 45 days after voting day in a by-election)

Box A: Name of Candidate and Office
Candidate's name as shown on the ballot
Last Name or Single Name
Van Meerbergen
Given Name(s)
Paul
Office for which the candidate sought election
Ward name or no. (if any)
10
Municipality
London
Spending Limit - General
$ 21,037.10
Spending Limit - Parties and Other Expressions of Appreciation
$ 2,108.71

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

Box B: Declaration
I, Paul Van Meerbergen, , declare that to the best of my knowledge and belief that these financial statements and attached supporting schedules are true and correct.

Signature of Candidate

Date Filed (yyyy/mm/dd)
March 28, 2019

Time Filed
4:07 p.m.

Initial of Candidate or Agent (if filed in person)

Signature of Clerk or Designate

Sarah Corman, a Commissioner for taking affidavits in Middlesex County, while a deputized Clerk of The Corporation of the City of London.
### Box C: Statement of Campaign Income and Expenses

**LOAN**

Name of bank or recognized lending institution

Amount borrowed

$  

**INCOME**

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total amount of all contributions (from line 1A in Schedule 1)</td>
<td>$ 21,154.77</td>
</tr>
<tr>
<td>Revenue from items $25 or less</td>
<td>$ 3</td>
</tr>
<tr>
<td>Sign deposit refund</td>
<td>$ 3</td>
</tr>
<tr>
<td>Revenue from fundraising events not deemed a contribution (from Part III of Schedule 2)</td>
<td>$ 3</td>
</tr>
<tr>
<td>Interest earned by campaign bank account</td>
<td>$ 3</td>
</tr>
<tr>
<td>Other (provide full details)</td>
<td>$ 3</td>
</tr>
<tr>
<td>Total Campaign Income (Do not include loan)</td>
<td>$ 21,154.77</td>
</tr>
</tbody>
</table>

**EXPENSES**

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

Inventory from previous campaign used in this campaign (list details in Table 4 of Schedule 1)

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aborting</td>
<td>$ 333.29</td>
</tr>
<tr>
<td>Brochures/leaflets</td>
<td>$ 8,600.04</td>
</tr>
<tr>
<td>Signs (including sign deposit)</td>
<td>$ 2,463.40</td>
</tr>
<tr>
<td>Meetings hosted</td>
<td>$ 3</td>
</tr>
<tr>
<td>Office expenses incurred until voting day</td>
<td>$ 3</td>
</tr>
<tr>
<td>Phone and/or Internet expenses incurred until voting day</td>
<td>$ 3</td>
</tr>
<tr>
<td>Starters, benefits, honoraria, professional fees incurred until voting day</td>
<td>$ 3</td>
</tr>
<tr>
<td>Bank charges incurred until voting day</td>
<td>$ 596.18</td>
</tr>
<tr>
<td>Interest charged on loan until voting day</td>
<td>$ 3</td>
</tr>
<tr>
<td>Other (provide full details)</td>
<td>$ 3</td>
</tr>
<tr>
<td>Total Expenses subject to general spending limit</td>
<td>$ 18,469.17</td>
</tr>
</tbody>
</table>

**EXPENSES**

Expenses subject to spending limit for parties and other expressions of appreciation

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supporter Appreciation Party - election day</td>
<td>$ 891.60</td>
</tr>
<tr>
<td>Other (provide full details)</td>
<td>$ 3</td>
</tr>
<tr>
<td>Total Expenses subject to spending limit for parties and other expressions of appreciation</td>
<td>$ 891.60</td>
</tr>
</tbody>
</table>
Exxenses not subject to spending limits

<table>
<thead>
<tr>
<th>Item</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accounting and audit</td>
<td></td>
</tr>
<tr>
<td>Casual of fundraising events/activities (list details in Part IV of Schedule 2)</td>
<td>$791.00</td>
</tr>
<tr>
<td>Office expenses incurred after voting day</td>
<td></td>
</tr>
<tr>
<td>Phone and/or Internet expenses incurred after voting day</td>
<td></td>
</tr>
<tr>
<td>Stipends, benefits, honoraria, professional fees incurred after voting day</td>
<td></td>
</tr>
<tr>
<td>Bank charges incurred after voting day</td>
<td>$12.00</td>
</tr>
<tr>
<td>Interest charged on loan after voting day</td>
<td></td>
</tr>
<tr>
<td>Expenses related to recount</td>
<td></td>
</tr>
<tr>
<td>Expenses related to controverted election</td>
<td></td>
</tr>
<tr>
<td>Expenses related to compliance audit</td>
<td></td>
</tr>
<tr>
<td>Expenses related to candidate’s disability (provide full details)</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>$</td>
</tr>
<tr>
<td>2</td>
<td>$</td>
</tr>
<tr>
<td>3</td>
<td>$</td>
</tr>
<tr>
<td>4</td>
<td>$</td>
</tr>
<tr>
<td>5</td>
<td>$</td>
</tr>
<tr>
<td>Other (provide full details)</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>$</td>
</tr>
<tr>
<td>2</td>
<td>$</td>
</tr>
<tr>
<td>3</td>
<td>$</td>
</tr>
<tr>
<td>4</td>
<td>$</td>
</tr>
<tr>
<td>5</td>
<td>$</td>
</tr>
<tr>
<td>Total Expenses not subject to spending limits</td>
<td>$833.00</td>
</tr>
</tbody>
</table>

Box D: Calculation of Surplus or Deficit

<table>
<thead>
<tr>
<th>Expression</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Excess (deficiency) of income over expenses (Income minus Total Expenses)</td>
<td>$</td>
</tr>
<tr>
<td>(C1 – C3)</td>
<td>$</td>
</tr>
<tr>
<td>Eligible deficit carried forward by the candidate from the last election (applies to 2018 regular election only)</td>
<td>$</td>
</tr>
<tr>
<td>Total (D1 = D2)</td>
<td>$</td>
</tr>
<tr>
<td>If there is a surplus, deduct any refund of candidate’s or spouse’s contributions to the campaign</td>
<td>$</td>
</tr>
<tr>
<td>Surplus (or deficit) for the campaign</td>
<td>$</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If line D3 above shows a surplus, the amount must be paid in trust, at the time the financial statements are filed, to the municipal clerk who is responsible for the conduct of the election.
### Schedule 1 - Contributions

#### Part I - Summary of Contributions

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contributions in goods and services from candidate and spouse</td>
<td>$794.58</td>
</tr>
<tr>
<td>Total value of contributions not exceeding $100 per contributor</td>
<td>$333.29</td>
</tr>
<tr>
<td>Total value of contributions exceeding $100 per contributor (from line 18 on page 5); list details in Table 1 and Table 2</td>
<td>$100.00</td>
</tr>
<tr>
<td>Total amount of contributions from individual other than candidate or spouse</td>
<td>$19,920.80</td>
</tr>
</tbody>
</table>

---

#### Table 1 - Monetary contributions from individuals other than candidate or spouse

<table>
<thead>
<tr>
<th>Name</th>
<th>Full Address</th>
<th>Date Received</th>
<th>Amount Received $</th>
<th>Amount $ Returned to Contributor or Paid to Clerk</th>
</tr>
</thead>
<tbody>
<tr>
<td>See schedule attached</td>
<td></td>
<td></td>
<td>19,520.00</td>
<td></td>
</tr>
</tbody>
</table>

---

☐ Additional information is listed on separate supplementary attachment

Total 19,520.00
### Paul Van Meerbergen Campaign 2018

**Schedule 1 - Contributions - Table 1**

<table>
<thead>
<tr>
<th>Contributor Name</th>
<th>Address</th>
<th>Date Received</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Douglas McCarthy</td>
<td>976 Farnham Rd, London ON N6K 1S3</td>
<td>05-Aug-18</td>
<td>250.00</td>
</tr>
<tr>
<td>Joseph Caragella</td>
<td>3800 Colonel Talbot Rd, London ON N6P 1H5</td>
<td>13-Aug-18</td>
<td>500.00</td>
</tr>
<tr>
<td>Allan Drews</td>
<td>238 Hyman St, London ON N6A 1N5</td>
<td>30-Aug-18</td>
<td>1,200.00</td>
</tr>
<tr>
<td>Michael E. Howe</td>
<td>301-100 Wellington St, London ON N6B 2K6</td>
<td>31-Aug-18</td>
<td>500.00</td>
</tr>
<tr>
<td>Vito Frizga</td>
<td>122 Farmington Crt, London ON N6K 3N9</td>
<td>12-Sep-18</td>
<td>500.00</td>
</tr>
<tr>
<td>Bruce Duncan</td>
<td>6 Mountainview Cres, London ON N6J 4R1</td>
<td>08-Sep-18</td>
<td>200.00</td>
</tr>
<tr>
<td>Ismail Omar</td>
<td>2143 Callingham Dr, London ON N6G 0M2</td>
<td>16-Sep-18</td>
<td>750.00</td>
</tr>
<tr>
<td>Stephen Stapleton</td>
<td>23311 Missouri Rd, Thorndale ON N0M 2P0</td>
<td>08-Aug-18</td>
<td>750.00</td>
</tr>
<tr>
<td>Myoung Ok Kim</td>
<td>15 King St Unit 1202, London ON N6A 5N8</td>
<td>20-Sep-18</td>
<td>200.00</td>
</tr>
<tr>
<td>Bruce McMinn</td>
<td>734 Hillcrest Dr, London ON N6K 1A9</td>
<td>18-Sep-18</td>
<td>500.00</td>
</tr>
<tr>
<td>Guido Van Meerbergen</td>
<td>110 Greenbrier Cres, London ON N6J 3X9</td>
<td>10-Sep-18</td>
<td>1,200.00</td>
</tr>
<tr>
<td>Donna Gleeson</td>
<td>87 Hillsmount Rd, London ON N6K 1W2</td>
<td>20-Sep-18</td>
<td>150.00</td>
</tr>
<tr>
<td>T &amp; J Drowa</td>
<td>120 Hillsmount Rd, London ON N6K 1V5</td>
<td>01-Oct-18</td>
<td>250.00</td>
</tr>
<tr>
<td>Richard Dejager</td>
<td>951 Country Club Cres, London ON N6G 5R6</td>
<td>27-Sep-18</td>
<td>300.00</td>
</tr>
<tr>
<td>Gregory Bierbaum</td>
<td>466 Richmond St Apt 600, London ON N6A 3P3</td>
<td>25-Sep-18</td>
<td>500.00</td>
</tr>
<tr>
<td>Wayne Reid</td>
<td>962 Adrondack Rd, London ON N6K 4W8</td>
<td>28-Sep-18</td>
<td>600.00</td>
</tr>
<tr>
<td>Steven Orser</td>
<td>601 Ross St, London ON N5Y 3V8</td>
<td>24-Sep-18</td>
<td>1,000.00</td>
</tr>
<tr>
<td>Ron Koudys</td>
<td>74 Tetherwood Blvd</td>
<td>28-Sep-18</td>
<td>250.00</td>
</tr>
<tr>
<td>Jie Mamkoe</td>
<td>2 Old Mill Crt, London ON N6K 4H6</td>
<td>29-Sep-18</td>
<td>250.00</td>
</tr>
<tr>
<td>Jeff Mahoney</td>
<td>230 Rideout St N Apt 2B01, London ON N6A 0A7</td>
<td>10-Oct-18</td>
<td>250.00</td>
</tr>
<tr>
<td>Jay Murray</td>
<td>828 Adrondack Rd, London ON N6K 4W7</td>
<td>10-Oct-18</td>
<td>500.00</td>
</tr>
<tr>
<td>Joseph Hassan</td>
<td>9334 Glendale Dr, Mt Brydges ON N0L 1W0</td>
<td>05-Oct-18</td>
<td>1,000.00</td>
</tr>
<tr>
<td>Patricia Fisher</td>
<td>1579 Westdel Bourne Rd, London ON N6K 4R1</td>
<td>10-Oct-18</td>
<td>150.00</td>
</tr>
<tr>
<td>Tarek Mansour</td>
<td>904 Cutross Ave, London ON N5G 5P1</td>
<td>11-Oct-18</td>
<td>150.00</td>
</tr>
<tr>
<td>Michael Johnston</td>
<td>6629 Egnem, Komoka ON N0L 1R0</td>
<td>11-Oct-18</td>
<td>200.00</td>
</tr>
<tr>
<td>Julie McIMari</td>
<td>4386 Lakeshore Rd, Burlington ON L7L 1B2</td>
<td>25-Sep-18</td>
<td>360.00</td>
</tr>
<tr>
<td>Tyler McIMari</td>
<td>4386 Lakeshore Rd, Burlington ON L7L 1B2</td>
<td>25-Sep-18</td>
<td>360.00</td>
</tr>
<tr>
<td>Christopher Craig</td>
<td>236 Ridgewood Cres, London ON N6J 3G6</td>
<td>09-Oct-18</td>
<td>400.00</td>
</tr>
<tr>
<td>John W. White</td>
<td>PO Box 56, Anna ON N0M 1C0</td>
<td>09-Oct-18</td>
<td>400.00</td>
</tr>
<tr>
<td>Antonio Mamme</td>
<td>100 Jamie Rd, Thornhill ON L4J 6A6</td>
<td>09-Oct-18</td>
<td>450.00</td>
</tr>
<tr>
<td>Ismail Omar</td>
<td>2143 Callingham Dr, London ON N6G 0M2</td>
<td>15-Oct-18</td>
<td>450.00</td>
</tr>
<tr>
<td>Sean Ford</td>
<td>307 Leitch Landing, Milton ON L9T 7M3</td>
<td>19-Oct-18</td>
<td>500.00</td>
</tr>
<tr>
<td>Natasha Rattatl</td>
<td>50 McIntosh Crt, London ON N6A 6A7</td>
<td>08-Dec-18</td>
<td>1,200.00</td>
</tr>
<tr>
<td>Bill Sherwood</td>
<td>131 Timber Cres, London ON N6K 2W3</td>
<td>20-Dec-18</td>
<td>1,200.00</td>
</tr>
<tr>
<td>Glenda Finlay</td>
<td>19-947 Adrondack Rd, London ON N6K 4Y7</td>
<td>24-Dec-18</td>
<td>1,200.00</td>
</tr>
<tr>
<td>Kelly Phillips</td>
<td>960 Farnham Rd, London ON N6K 1S1</td>
<td>28-Dec-18</td>
<td>900.00</td>
</tr>
</tbody>
</table>

**Total Contributions > $100**

19,520.00
Table 2: Contributions in goods or services from individuals other than candidate or spouse
(Note: must also be recorded as Expenses in Box C)

<table>
<thead>
<tr>
<th>Name</th>
<th>Full Address</th>
<th>Description of Goods or Services</th>
<th>Date Received (yymmdd)</th>
<th>Value $</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jim Graham</td>
<td>11110 Longwoods Rd Delaware ON N0L 1Z0</td>
<td>Rental of 4 metal sign posts</td>
<td>2018/09/01</td>
<td>406.80</td>
</tr>
</tbody>
</table>

☐ Additional information is listed on separate supplementary attachment

Total for Part II - Contributions exceeding $100 per contributor
(Add totals from Table 1 and Table 2 and record the total in Part 1 - Summary of Contributions)

$ 19,928.80 18

Part III - Contributions from candidate or spouse
Table 3: Contributions in goods or services

<table>
<thead>
<tr>
<th>Description of Goods or Services</th>
<th>Date Received (yymmdd)</th>
<th>Value $</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Description of Goods or Services</td>
<td>Date Received (yyyy/mm/dd)</td>
<td>Value $</td>
</tr>
<tr>
<td>---------------------------------</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Additional information is listed on separate supplementary attachment</td>
<td>Total</td>
<td></td>
</tr>
</tbody>
</table>

Table 4: Inventory of campaign goods and materials from previous municipal campaign used in this campaign
(Note: value must be recorded as a contribution from the candidate and as an expense)

<table>
<thead>
<tr>
<th>Description</th>
<th>Date Acquired (yyyy/mm/dd)</th>
<th>Supplier</th>
<th>Quantity</th>
<th>Current Market Value $</th>
</tr>
</thead>
<tbody>
<tr>
<td>Small lawn signs with H frame</td>
<td>2014/11/01</td>
<td>candidate</td>
<td>65</td>
<td>220.35</td>
</tr>
<tr>
<td>32 x 48&quot; lawn signs</td>
<td>2013/11/01</td>
<td>candidate</td>
<td>5</td>
<td>112.94</td>
</tr>
<tr>
<td>Additional information is listed on separate supplementary attachment</td>
<td>Total</td>
<td>333.29</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Schedule 2 – Fundraising Events and Activities

Fundraising Event/Activity
Complete a separate schedule for each event or activity held

Additional schedule(s) attached

Description of fundraising event/activity

Date of event/activity (yyyymmdd)

Part I – Ticket revenue
Admission charge (per person)
(if there are a range of ticket prices, attach complete breakdown of all ticket sales)

<table>
<thead>
<tr>
<th>Number of tickets sold</th>
<th>$</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2A</td>
</tr>
<tr>
<td></td>
<td>2B</td>
</tr>
</tbody>
</table>

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

Part II – Other revenue deemed a contribution
(e.g., revenue from goods sold in excess of fair market value)
Provide details

| 1          | $ |
| 2          | $ |
| 3          | $ |
| 4          | $ |
| 5          | $ |

Total Part II (Include in Part 1 of Schedule 1) $

Part III – Other revenue not deemed a contribution
(e.g., contribution of $25 or less, goods or services sold for $25 or less)
Provide details

| 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          | $ |
| 2          | $ |
| 3          | $ |
| 4          | $ |
| 5          | $ |
| 6          | $ |
| 7          | $ |
| 8          | $ |

Total Part IV Expenses (Include under Expenses in Box C) $

UNP [03/16/94]
Auditor's Report
Municipal Elections Act, 1996 (Section 88.25)

A candidate who has received contributions or incurred expenses in excess of $10,000 must attach an auditor's report.

Professional Designation of Auditor
Chartered Professional Accountant

<table>
<thead>
<tr>
<th>Municipality</th>
<th>Date (yyyy/mm/dd)</th>
</tr>
</thead>
<tbody>
<tr>
<td>London</td>
<td></td>
</tr>
</tbody>
</table>

Contact Information

<table>
<thead>
<tr>
<th>Last Name or Single Name</th>
<th>Given Name(s)</th>
<th>Licence Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Snyders</td>
<td>Mark</td>
<td>1-21218</td>
</tr>
</tbody>
</table>

Address

<table>
<thead>
<tr>
<th>Suite/Unit No.</th>
<th>Street No.</th>
<th>Street Name</th>
<th>Province</th>
<th>Postal Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>82</td>
<td></td>
<td>Wellington St</td>
<td>ON</td>
<td>N6E 3K3</td>
</tr>
</tbody>
</table>

Telephone No. (including area code) 519 660-6060
Email Address mark@meb.on.ca

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

Report is attached

Personal Information, if any, collected on this form is obtained under the authority of sections 88.25 and 55 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.
INDEPENDENT AUDITOR’S REPORT

To the City Clerk of The City of London re: Paul Van Meerbergen Campaign

Qualified Opinion

We have audited the accompanying Financial Statement - Auditor’s Report Candidate of the Paul Van Meerbergen Election Campaign (the “financial statement”), for the campaign period July 27, 2018 to December 31, 2018 relating to the City of London Municipal Election held on October 22, 2018, prepared in accordance with Section 18 of the Municipal Elections Act, 1996.

In our opinion, except for the possible effects of the matter described in the Basis for Qualified Opinion section of our report, the accompanying financial statements present fairly, in all material respects, the financial position of the Campaign as at December 31, 2018, and the results of its operations for the campaign period then ended in accordance with the accounting treatment prescribed in the Municipal Elections Act, 1996.

Basis for Qualified Opinion

Due to the nature of the types of transactions inherent in any election campaign, the completeness of the various categories of income and expenses is not susceptible to satisfactory audit verification. Accordingly, our verification of income and expenses was limited to the amounts recorded in the candidate’s election campaign records and we were not able to determine whether any adjustments might be necessary to assets, liabilities, income, expenses, or campaign period surplus/deficit.

We conducted our audit in accordance with Canadian generally accepted auditing standards. Our responsibilities under those standards are further described in the Auditor’s Responsibilities for the Audit of the Financial Statements section of our report. We are independent of the Campaign in accordance with the ethical requirements that are relevant to our audit of the financial statements in Canada, and we have fulfilled our other ethical responsibilities in accordance with those requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our qualified audit opinion.

Other Matter

Without modifying our opinion, we note that the Form 4 is prepared for the information and use of the Candidate and the City Clerk to comply with the Municipal Elections Act, 1996, and as such, may not be suitable for another purpose. The attached Form 4 is not intended to be and should not be used by anyone other than the specified users or for any other purpose.

Responsibilities of the Candidate for the Financial Statements

The Candidate is responsible for the preparation and fair presentation of the financial statements in accordance with the accounting treatment prescribed in the Municipal Elections Act, 1996.

(continues)
INDEPENDENT AUDITOR’S REPORT (continued)

Auditor’s Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor’s report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with Canadian generally accepted auditing standards will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements. As part of an audit in accordance with Canadian generally accepted auditing standards, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Campaign’s internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.

We communicate with the Candidate regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

London, Ontario
March 22, 2019

MacNeill Edmundson
PROFESSIONAL CORPORATION
CHARTERED PROFESSIONAL ACCOUNTANTS
Authorized to practise public accounting by the Chartered Professional Accountants of Ontario

James B. MacNeill CPhA, CA
Jeremy A. Giles CPhA, CA
Lisa Savage CPhA, CA
Robert F. Edmundson CPhA, CA (Retired)

88 WELLINGTON STREET, LONDON, ONTARIO N6A 2K2 TEL 519.455.8000 FAX 519.457.6416 WEB www.mech.ca
Appendix ‘D’

Shawn Lewis Blackridge Confession
STATEMENT ON BLACKRIDGE STRATEGIES

During the 2018 Municipal Election Campaign, I contracted work to Blackridge Strategies for 2 items. Those items were a phone poll in Ward 2 to gage voter sentiments and a "get out the vote" phone message on Election Day as I did not have the capacity to execute these two items myself. I chose Blackridge because they were local, not some firm out of Ottawa or Toronto.

Throughout the campaign, my social media, printed materials and website content were produced 100% by me and my campaign team, not Blackridge Strategies.

I consider former Councillor Ridley a friend, and in fact shared a campaign platform announcement with her, so recent news regarding a smear campaign allegedly coming from individuals with Blackridge bothers me considerably. Criticizing former Councillor Ridley's parenting is especially troublesome to me because as someone who also has a parental role there have been occasions when a child in my care has had occupied themselves at city hall while I've had to fulfilled council duties. I have not faced criticism for this and I think that illustrates the double standard women unfairly face.

Politics can be combative, but the focus should be the issues facing our community. Obviously in light of recent developments, I will not be contracting future work with Blackridge Strategies.
Appendix ‘E’
Ribfest Booth
Shawn Lewis
@shawnwlewis

Down at #LdnOnt #Ribfest in the meet the candidates tent with fellow candidates @Randy_Warden @fyfemillar & @MelanieOB1. Come eat, drink, and find out about us. #LondonVotes.
Appendix 'F'
Shawn Lewis Billboard Signs
Appendix ‘G’

Campaign Headquarters
If you have not had the opportunity to watch Shawn Lewis, a great friend of mine from the East end who is really, truly good people - please take a moment to do so!! Thursday nights @ 9:30 on Rogers #ldnOnt

@ldnOnt added 6 new photos.
April 17 at 4:08pm

Blooming like colourful spring flowers, thanks to the Londoners who are helping spread the love with our signs.
Appendix 'H'

Respect The Limit Signs
Hey Argyle-area friends, after 20 years we're finally getting a community centre, but since we don't have one yet, I picked up a few of the @SlowDownTV signs from City Hall. If you want a sign for your lawn or record where to store the signs on neighborhood streets, please send me a private message and I'll deliver one to you before supplies last. (I only have a small number.)

Shawn Lewis, London Politics
Live Time Page 18 April 1915

Martin Kost, Christopher Duskin, Steve Hilder and 6 others like this.

Shawn Lewis, London Politics 2

deliveries made this evening to yards on Vancouver St (I don't expect you to slow down on Driveway or even VMD or Highway, but residential neighbourhoods aren't express ways.

by

Martin Kost: We need them along Allen Place, but there are apartment places so landlord will have allow and organization. Smarter idea Up.

3 hr

Martin Enssl: I’ve need them along Allen.
Appendix 'I'

London Institute Campaign Training
Appendix ‘J’

Lord Nelson Community Event
Thank you to the Lord Nelson Public School Home & School Association for having me to their BBQ & helping the school raise funds. Here’s a story about elected officials at work.

Our school community really loves our school and our students. And a special shoutout to the students who came up and asked questions and proudly held up my sign. It was an awesome event.
Appendix ‘K’
Paolotto and Lewis Collusion
SEPT 11
Free BBQ with Paul Paolatto & Shawn Lewis
Public · Hosted by Paul Paolatto and Shawn Lewis, London Politics

Interested

ⓘ Tuesday, 11 September 2018 from 18:30-20:00 EDT
about 9 months ago

📍 1625 Dundas St, London, ON N5W 3C3, Canada
Show map
Shawn Lewis
@shawnwlewis

Down at #LdnOnt #Ribfest in the meet the candidates tent with fellow candidates @Randy_Warden @fyfemillar & @MelanieOB1. Come eat, drink, and find out about us. #LondonVotes.
Ontario

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

For the campaign period from (day candidate filed nomination) 20180501 to 20181212

- Initial filing reflecting finances to December 31 (or 45 days after voting day in a by-election)
- Supplementary filing including finances after December 31 (or 45 days after voting day in a by-election)

Box A: Name of Candidate and Office
Candidate's name as shown on the ballot
LEWIS

Given Name(s)
SHAWN

Office for which the candidate sought election
CITY COUNCILLOR

Ward name or no. (if any)
2

Municipality
LONDON

Spending Limit - General
$ 20,037.80

Spending Limit - Parties and Other Expressions of Appreciation
$ 2003.48

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

Signature of Candidate

Date (yyyy/mm/dd)
2018/12/14

Box B: Declaration

Date Filed (yyyy/mm/dd)
Dec 14/18

Time Filed
12:43 pm

Initial of Candidate or Agent (if filed in person)

Signature of Clerk or Designate

SARAH CORMAN, a Commissioner for taking Oaths and taking and Oaths, Middlesex County while a Deputized Clerk of The Corporation of the City of London.
### 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) + $ 22,909.50
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 + $ 
Other (provide full details)
1. + $ 
2. + $ 
3. + $ 
4. + $ 
5. + $ 
Total Campaign Income (Do not include loan) + $ 22,909.50 C1

**EXPENSES (Note: include the value of contributions of goods and services)**
Expenses subject to general spending limit
Inventory from previous campaign used in this campaign (list details in Table 4 of Schedule 1) + $ 588.00
Advertising + $ 997.41
Brochures/flyers + $ 2,971.61
Signs (including sign deposit) + $ 10,019.07
Meetings hosted + $ 303.96
Office expenses incurred until voting day + $ 2,267.13
Phone and/or internet expenses incurred until voting day + $ 1,099.09
Salaries, benefits, honoraria, professional fees incurred until voting day + $ 300.40
Bank charges incurred until voting day + $ 131.50
Interest charged on loan until voting day + $ 
Other (provide full details)
1. FUEL EXPENSES FOR SIGN INSTALLATION CREW + $ 310.00
2. PAYPAL FEES + $ 194.65
3. + $ 
4. + $ 
5. + $ 
Total Expenses subject to general spending limit + $ 19,092.82 C2

**EXPENSES**
Expenses subject to spending limit for parties and other expressions of appreciation
1. VOLUNTEER VICTORY PARTY + $ 1,508.85
2. COMMUNITY THANK YOU CANDY FOR SANTA CLAUS PARA + $ 71.76
3. + $ 
4. + $ 
5. + $ 
Total Expenses subject to spending limit for parties and other expressions of appreciation = $ 1,580.41 C3
Expenses not subject to spending limits

<table>
<thead>
<tr>
<th>Category</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accounting and audit</td>
<td>+ $565.00</td>
</tr>
<tr>
<td>Cost of fundraising events/activities (list details in Part IV of Schedule 2)</td>
<td>+ $</td>
</tr>
<tr>
<td>Office expenses incurred after voting day</td>
<td>+ $</td>
</tr>
<tr>
<td>Phone and/or internet expenses incurred after voting day</td>
<td>+ $</td>
</tr>
<tr>
<td>Salaries, benefits, honoraria, professional fees incurred after voting day</td>
<td>+ $</td>
</tr>
<tr>
<td>Bank charges incurred after voting day</td>
<td>+ $42.50</td>
</tr>
<tr>
<td>Interest charged on loan after voting day</td>
<td>+ $</td>
</tr>
<tr>
<td>Expenses related to recount</td>
<td>+ $</td>
</tr>
<tr>
<td>Expenses related to controverted election</td>
<td>+ $</td>
</tr>
<tr>
<td>Expenses related to compliance audit</td>
<td>+ $</td>
</tr>
<tr>
<td>Expenses related to candidate’s disability (provide full details)</td>
<td>+ $</td>
</tr>
<tr>
<td>1.</td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td></td>
</tr>
<tr>
<td>Other (provide full details)</td>
<td>+ $</td>
</tr>
<tr>
<td>1.</td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td></td>
</tr>
<tr>
<td>Total Expenses not subject to spending limits</td>
<td>$607.50</td>
</tr>
</tbody>
</table>

Total Campaign Expenses (C2 + C3 + C4) = $21,280.73

Box D: Calculation of Surplus or Deficit

Excess (deficiency) of income over expenses (Income minus Total Expenses) (C1 – C5) + $1,628.77 D1

Eligible deficit carried forward by the candidate from the last election (applies to 2018 regular election only) – $ D2

Total (D1 – D2) = $1,628.77 D3

If there is a surplus, deduct any refund of candidate’s or spouse’s contributions to the campaign – $1,628.77 D3

Surplus (or deficit) for the campaign = $ D3

If line D3 shows a surplus, the amount must be paid in trust, at the time the financial statements are filed, to the municipal clerk who is responsible for the conduct of the election.
Schedule 1 - Contributions

Part I – Summary of Contributions

Contributions in money from candidate and spouse  
+ $ 2,200.00
Contributions in goods and services from candidate and spouse  
(Include value listed in Table 3 and Table 4)  
+ $ 588.00
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 candidate or spouse).  
+ $ 4,521.50
Total value of contributions exceeding $100 per contributor (from line 1B on page 5; list details in Table 1 and Table 2)  
- Include ticket revenue, contributions in money, goods and services where the total contribution from a contributor exceeds $100 (do not include contributions from candidate or spouse).  
+ $ 15,600.00

Less: Contributions returned or payable to the contributor  
- $  
Contributions paid or payable to the clerk, including contributions from anonymous sources exceeding $20  
- $ 

Total Amount of Contributions (record under Income in Box C)  
= $ 22,909.50 1A

Part II – Contributions exceeding $100 per contributor – individuals other than candidate or spouse

Table 1: Monetary contributions from individuals other than candidate or spouse

<table>
<thead>
<tr>
<th>Name</th>
<th>Full Address</th>
<th>Date Received</th>
<th>Amount Received $</th>
<th>Amount $ Returned to Contributor or Paid to Clerk</th>
</tr>
</thead>
<tbody>
<tr>
<td>SEE ATTACHED LISTING</td>
<td></td>
<td></td>
<td>15,600.00</td>
<td></td>
</tr>
</tbody>
</table>

☐ Additional information is listed on separate supplementary attachment

Total 15,600.00
### Table 2: Contributions in goods or services from individuals other than candidate or spouse
(Note: must also be recorded as Expenses in Box C)

<table>
<thead>
<tr>
<th>Name</th>
<th>Full Address</th>
<th>Description of Goods or Services</th>
<th>Date Received (yyyy/mm/dd)</th>
<th>Value $</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>

- Additional information is listed on separate supplementary attachment

Total

Total for Part II - Contributions exceeding $100 per contributor
(Add totals from Table 1 and Table 2 and record the total in Part 1 - Summary of Contributions)

$ 15,600.00

### Part III - Contributions from candidate or spouse

<table>
<thead>
<tr>
<th>Description of Goods or Services</th>
<th>Date Received (yyyy/mm/dd)</th>
<th>Value $</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inventory</td>
<td>2018/05/01</td>
<td>588.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
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<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Description of Goods or Services</td>
<td>Date Received (yyyy/mm/dd)</td>
<td>Value $</td>
</tr>
<tr>
<td>---------------------------------</td>
<td>-----------------------------</td>
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<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Total 1,176.00

Table 4: Inventory of campaign goods and materials from previous municipal campaign used in this campaign
(Note: value must be recorded as a contribution from the candidate and as an expense)

<table>
<thead>
<tr>
<th>Description</th>
<th>Date Acquired (yyyy/mm/dd)</th>
<th>Supplier</th>
<th>Quantity</th>
<th>Current Market Value $</th>
</tr>
</thead>
<tbody>
<tr>
<td>T-BAR 6&quot;</td>
<td>2014/01/09</td>
<td>TSC STORES</td>
<td>30</td>
<td>338.00</td>
</tr>
<tr>
<td>WOODEN POSTS</td>
<td>2014/11/01</td>
<td>TANYA PARK</td>
<td>50</td>
<td>50.00</td>
</tr>
<tr>
<td>WOODEN POSTS</td>
<td>2015/01/01</td>
<td>SHAWN LEWIS</td>
<td>20</td>
<td>20.00</td>
</tr>
<tr>
<td>T-BAR 6&quot; USED</td>
<td>2015/10/01</td>
<td>SHAWN LEWIS</td>
<td>30</td>
<td>180.00</td>
</tr>
</tbody>
</table>

Total 558.00

Additional information is listed on separate supplementary attachment

9503P (2018/04)  Page 69
### Schedule 2 – Fundraising Events and Activities

**Fundraising Event/Activity**
Complete a separate schedule for each event or activity held

| □ Additional schedule(s) attached |
| Description of fundraising event/activity |
| Date of event/activity (yyyy/mm/dd) |

#### Part I – Ticket revenue

| Admission charge (per person) |
| (If there are a range of ticket prices, attach complete breakdown of all ticket sales) |
| Number of tickets sold | $ \text{2A} |
| $ \text{2B} |
| Total Part I (2A X 2B) (include in Part 1 of Schedule 1) |

#### Part II – Other revenue deemed a contribution

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

Provide details

1. + $ |
2. + $ |
3. + $ |
4. + $ |
5. + $ |

Total Part II (include in Part 1 of Schedule 1) = $

#### Part III – Other revenue not deemed a contribution

(e.g. contribution of $25 or less; goods or services sold for $25 or less)

Provide details

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. + $ |
2. + $ |
3. + $ |
4. + $ |
5. + $ |
6. + $ |
7. + $ |
8. + $ |

Total Part IV Expenses (include under Expenses in Box C) = $

---

9503P (2018/04)
Auditor’s Report
Municipal Elections Act, 1996 (Section 88.25)

A candidate who has received contributions or incurred expenses in excess of $10,000 must attach an auditor’s report.

<table>
<thead>
<tr>
<th>Professional Designation of Auditor</th>
</tr>
</thead>
<tbody>
<tr>
<td>CPA, CA, LPA</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Municipality</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>London, Ontario</td>
<td>Last Name or Single Name</td>
</tr>
<tr>
<td></td>
<td>White</td>
</tr>
<tr>
<td></td>
<td>Given Name(s)</td>
</tr>
<tr>
<td></td>
<td>Amy</td>
</tr>
<tr>
<td></td>
<td>Licence Number</td>
</tr>
<tr>
<td></td>
<td>1-19490</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Address</th>
<th>Telephone No. (including area code)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suite/Unit No.</td>
<td>519 319-6467</td>
</tr>
<tr>
<td>1708</td>
<td></td>
</tr>
<tr>
<td>Street No.</td>
<td></td>
</tr>
<tr>
<td>405</td>
<td></td>
</tr>
<tr>
<td>Street Name</td>
<td></td>
</tr>
<tr>
<td>WATERLOO</td>
<td></td>
</tr>
<tr>
<td>Municipality</td>
<td>Province</td>
</tr>
<tr>
<td>LONDON</td>
<td>ONTARIO</td>
</tr>
<tr>
<td></td>
<td>Postal Code</td>
</tr>
<tr>
<td></td>
<td>N6B 3R7</td>
</tr>
</tbody>
</table>

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

☑ Report is attached
Table 1: Monetary contributions from individuals other than candidate or spouse

<table>
<thead>
<tr>
<th>Last Name</th>
<th>First Name</th>
<th>Address</th>
<th>Date Received</th>
<th>Contributed ($)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sher</td>
<td>David</td>
<td>11 Owen St Ingersoll ON N5C 4G7</td>
<td>1-May</td>
<td>250.00</td>
</tr>
<tr>
<td>Miller</td>
<td>Cheryl</td>
<td>351 Millbank Dr London ON</td>
<td>1-May</td>
<td>750.00</td>
</tr>
<tr>
<td>Marvin</td>
<td>Matthew</td>
<td>55 Derogue Cres London ON NW1 1V7</td>
<td>5-May</td>
<td>1,000.00</td>
</tr>
<tr>
<td>Lewis</td>
<td>Wendy</td>
<td>300 Park St Dresden ON N0P 1M0</td>
<td>5-May</td>
<td>200.00</td>
</tr>
<tr>
<td>Mattyssen</td>
<td>Irene</td>
<td>23838 Bear Creek Rd RR1 Ilderton ON N0M 2A0</td>
<td>5-May</td>
<td>200.00</td>
</tr>
<tr>
<td>Coulier</td>
<td>Scott</td>
<td>57 Highland Court, London ON</td>
<td>4-May</td>
<td>500.00</td>
</tr>
<tr>
<td>Konrad</td>
<td>Mark</td>
<td>972 Maitland St London ON N5T 2X4</td>
<td>10-May</td>
<td>250.00</td>
</tr>
<tr>
<td>Sutherland</td>
<td>Gus</td>
<td>66 Bloomsbury London ON</td>
<td>11-May</td>
<td>1,000.00</td>
</tr>
<tr>
<td>Farahni</td>
<td>Amir</td>
<td>333 - 717 Richmond St London ON N6A 3H1</td>
<td>10-May</td>
<td>250.00</td>
</tr>
<tr>
<td>Moscofa</td>
<td>Hassan</td>
<td>571 Eagletrace Drive</td>
<td>11-May</td>
<td>1,200.00</td>
</tr>
<tr>
<td>Smith</td>
<td>Michael</td>
<td>1019 Maitland St London ON N5Y 2X8</td>
<td>15-May</td>
<td>200.00</td>
</tr>
<tr>
<td>Maisonneville</td>
<td>Jen (Etransfer)</td>
<td>24 Marley PI London ON</td>
<td>22-May</td>
<td>200.00</td>
</tr>
<tr>
<td>Gauss</td>
<td>Ryan</td>
<td>53 Queen Mary Crescent, London ON N6H 4BS</td>
<td>29-May</td>
<td>200.00</td>
</tr>
<tr>
<td>Sauer</td>
<td>Mike</td>
<td>80 Glass Ave London ON</td>
<td>13-Jun</td>
<td>250.00</td>
</tr>
<tr>
<td>Girtty</td>
<td>Sarah</td>
<td>18736 Gore Rd RR3, Blenheim</td>
<td>27-Jun</td>
<td>300.00</td>
</tr>
<tr>
<td>Dustin</td>
<td>Christopher</td>
<td>207-25 Grand Ave London ON N6C 1L3</td>
<td>7-Jul</td>
<td>200.00</td>
</tr>
<tr>
<td>Tabuns</td>
<td>Peter</td>
<td>20 Montcalm St. Toronto ON M4Y 1K7</td>
<td>23-Jul</td>
<td>200.00</td>
</tr>
<tr>
<td>Orser</td>
<td>Stephen</td>
<td>601 Ross St. London ON</td>
<td>4-Aug</td>
<td>1,000.00</td>
</tr>
<tr>
<td>Hardy</td>
<td>Chuck</td>
<td>31 Caprice Cres</td>
<td>14-Aug</td>
<td>250.00</td>
</tr>
<tr>
<td>Van Luewen</td>
<td>Vivian</td>
<td>487 Admiral Dr</td>
<td>29-Aug</td>
<td>250.00</td>
</tr>
<tr>
<td>Lewis</td>
<td>Wendy</td>
<td>4-300 Park Ave, Dresden ON</td>
<td>5-Sep</td>
<td>200.00</td>
</tr>
<tr>
<td>Maynard</td>
<td>Stephen</td>
<td>125 Desmond Ave Kanata ON</td>
<td>19-Sep</td>
<td>500.00</td>
</tr>
<tr>
<td>Stapleton</td>
<td>Stephen</td>
<td>23311 Nissouri Rd. Thorndale ON, N0M 2P0</td>
<td>1-Oct</td>
<td>500.00</td>
</tr>
<tr>
<td>Omer</td>
<td>Ismail</td>
<td>2143 Callingham Dr London ON N6G 0M2</td>
<td>28-Sep</td>
<td>750.00</td>
</tr>
<tr>
<td>Memme</td>
<td>Antonio</td>
<td>100 Jaimie Rd Thornhill ON L4J5A6</td>
<td>15-Oct</td>
<td>450.00</td>
</tr>
<tr>
<td>White</td>
<td>John</td>
<td>90 Box 54, Arv ON N0M1C0</td>
<td>15-Oct</td>
<td>400.00</td>
</tr>
<tr>
<td>Craigan</td>
<td>Christopher</td>
<td>230 Ridgewood Cres London ON, N0J3G6</td>
<td>15-Oct</td>
<td>400.00</td>
</tr>
<tr>
<td>McDermid</td>
<td>Tyler</td>
<td>4388 Lakeshore Blvd Burlington ON L7L 1B2</td>
<td>15-Oct</td>
<td>250.00</td>
</tr>
<tr>
<td>Googers</td>
<td>Rick</td>
<td>23-1800 Sumac Way London N6K0G1</td>
<td>15-Oct</td>
<td>600.00</td>
</tr>
<tr>
<td>Elisa</td>
<td>Bilal</td>
<td>1102 Cherry Grove Dr London ON N6K 5B2</td>
<td>12-Oct</td>
<td>1,200.00</td>
</tr>
<tr>
<td>Johnston</td>
<td>Michael</td>
<td>6629 Egrem RR3 Komoka ON, N0L1R0</td>
<td>17-Oct</td>
<td>200.00</td>
</tr>
<tr>
<td>Maniour</td>
<td>Tarek</td>
<td>904 Cross Ave, London ON N6G5P1</td>
<td>17-Oct</td>
<td>150.00</td>
</tr>
<tr>
<td>Fisher</td>
<td>Patricia</td>
<td>1579 Westdale Bourne, London ON N6K4R1</td>
<td>17-Oct</td>
<td>150.00</td>
</tr>
<tr>
<td>Souffin</td>
<td>Kareem</td>
<td>303 Richmond St. Suite 201, London</td>
<td>20-Oct</td>
<td>1,200.00</td>
</tr>
</tbody>
</table>

Total 15,600.00
INDEPENDENT AUDITOR'S REPORT

To Cathy Saunders, City Clerk, City of London

I have audited the accompanying Financial Statement – Auditor’s Report Candidate – Form 4 ("Financial Statement") of Shawn Lewis ("Candidate"), which comprise the Statement of Campaign Income and Expenses, Calculation of Surplus or Deficit, and related schedules for the period May 1, 2018 to December 12, 2018. The Financial Statement has been prepared by the candidate based on Section 88 of the Municipal Elections Act, 1996.

CANDIDATE’S RESPONSIBILITY FOR THE FINANCIAL STATEMENT

The candidate is responsible for the preparation of the Financial Statement in accordance with Section 88 of the Municipal Elections Act, 1996 and for such internal control as the candidate determines is necessary to enable the preparation of a Financial Statement that is free from material misstatement, whether due to fraud or error.

AUDITOR’S RESPONSIBILITY

My responsibility is to express an opinion on the Financial Statement based on my audit. I conducted my audit in accordance with Canadian generally accepted auditing standards. Those standards require that I comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the Financial Statement is free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the Financial Statement. The procedures selected depend on the auditor’s judgement, including the assessment of the risks of material misstatement of the financial statement, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the candidate’s preparation of the Financial Statement in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the candidate’s internal control. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates made by the candidate, if any, as well as evaluating the overall presentation of the Financial Statement.

I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my qualified audit opinion.
BASIS FOR QUALIFIED OPINION

Due to the nature of the types of transactions inherent in an election campaign, the completeness of donations of goods and services and receipts and disbursements is not susceptible to satisfactory audit verification. Accordingly, my verification of these transactions was limited to the amounts recorded in the accounting records of the candidate, and I was not able to determine whether any adjustments might be necessary to income and expenses and surplus (deficit).

QUALIFIED OPINION

In my opinion, except for the possible effects of the matter described in the Basis for Qualified Opinion paragraph, the Financial Statement of the candidate for the period from May 1, 2018 to December 12, 2018 (relating to the election held on October 22, 2018) is prepared, in all material respects, in accordance with Section 88 of the Municipal Elections Act, 1996.

BASIS OF ACCOUNTING AND RESTRICTION ON DISTRIBUTION AND USE

The Financial Statement is prepared to assist the candidate to meet the requirements of Section 88 of the Municipal Elections Act, 1996. As a result, the Financial Statement may not be suitable for another purpose. My report is intended solely for the candidate and Cathy Saunders, City Clerk, City of London and should not be distributed to or used by parties other than the candidate and the Ministry of Municipal Affairs and Housing.

December 12, 2018
London, ON

Authorized to practice public accounting by the Chartered Professional Accountants of Ontario
From: Saunders, Cathy
To: Bush, Anastasia
Subject: FW: [EXTERNAL] Re: Request for Compliance Audit
Date: Thursday, June 27, 2019 4:42:52 PM
Attachments: Compliance Audit Request - Accompanying notes - FARAH, PHILLIPS, BLACKRIDGE.docx

Cathy Saunders, MPA, RPP
City Clerk
City Clerk’s Office
City of London

P.O. Box 5035, London, Ontario N6A 4L9
P: 519.661.CITY (2489) x 4937 | Fax: 519.661.4892
csaunder@london.ca | www.london.ca

From: Stephen Turner [mailto:stephenturner@sympatico.ca]
Sent: Thursday, June 27, 2019 4:27 PM
To: Elections <Elections@london.ca>
Cc: Saunders, Cathy <csaunder@london.ca>
Subject: [EXTERNAL] Re: Request for Compliance Audit

One further file for the submission. My apologies for the omission.

Steve

> On Jun 27, 2019, at 4:11 PM, Stephen Turner <stephenturner@sympatico.ca> wrote:
> 
> Dear Cathy,
> 
> Please accept my request for a compliance audit of Amir Farahi, Barry Phillips and Blackridge Strategies with respect to activities as third-party advertisers as defined under the Municipal Elections Act Sect 1(1).
> 
> I note that the form on the City’s website requires being witnessed by a Commissioner of Oaths. As I am out of town today, I am unable to do so, however, I would draw your attention that there is no such requirement under the Municipal Elections Act. I would ask that you process this request in that knowledge.
> 
> Sincerely,
> 
> Stephen Turner
Application for a Compliance Audit
Section 88.33 and 88.35 Municipal Elections Act, S.O. 1996, c. 32
The Corporation of the City of London
Municipal Election Compliance Audit Committee

Affidavit of Applicant

I, ___________ of the City of London in the Province of Ontario,

DO SOLEMNLY DECLARE:

I am an eligible elector in the City of London by virtue of the fact that:

I am a Canadian Citizen;
I am at least 18 years of age as of October 22, 2018;
I am a resident, owner or tenant of land, or the spouse of such owner or tenant of land in the City of London; and
I am not prohibited from voting under Section 17 (3) of the Municipal Elections Act, 1996 or otherwise prohibited by law.

I have reasonable grounds to believe that Amir Farah, Barry Phillips and Black Box Strategies are a Candidate or a Registered Third Party in relation to the October 22, 2018 Municipal Election for the City of London has contravened the following provision(s) of the Municipal Elections Act, S.O. 1996, c. 32 (Act)

88.4(1), 88.5(1), 88.6(1), 88.10(1), 88.12(1), 88.21(1)(x5), 88.29(1)

(List specific section(s) of the Act)

The particulars of this belief are outlined in the attached Schedule A (please outline reasons for your belief on the page labeled “Schedule A” and attach any supporting documents).

This affidavit is made for the purpose of requesting that this matter be reviewed and for no other purpose.

SWORN (or DECLARED) before me at the City of London in the Province of Ontario on

2019-06-27

Date (YYYY-MM-DD)

Signature of applicant

Signature of a Commissioner for taking affidavits, etc.

Please see attached Schedule A

Applicant’s address: 463 Tecumseh Ave E. London, ON
Applicant’s telephone number: 519-672-6296
Applicant’s e-mail address: stepheinuorne@gmail.com

This application and supporting documents will be placed on a public agenda and shared with the Compliance Audit Committee, the Auditor chosen to investigate this application (if applicable) and the Council of the City of London. The personal information collected on this form is collected under the authority of the Municipal Act, 2001 and the Municipal Elections Act, 1996 for the purpose of applying for a compliance audit of a candidate’s election campaign finances. Pursuant to the Municipal Elections Act, 1996 this completed document is a public record, despite anything in the Municipal Freedom of Information and Protection of Privacy Act, 1990 and, until its destruction may be inspected 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 City Clerk, 300 Dufferin Avenue, London ON (519) 661-2489 (CITY) Ext. 4937.
Deadline for making the application:

In accordance with section 88.33 (3) and 88.35 (3) of the Act the application must be made within 90 days after the latest of the following dates:

1. The candidate or registered third party's filing date under section 88.30.
2. The date the candidate or registered third party filed a financial statement, if the statement was filed within 30 days after the applicable filing date under section 88.30.
3. The candidate or registered third party's supplementary filing date, if any, under section 88.30.
4. The date on which the candidate or registered third party's extension, if any, under subsection 88.23 (6) or 88.27 (3) expires.

Application to be filed in person, with the City Clerk at 308-300 Dufferin Avenue, London, Ontario.

Schedule "A"

Stephen Turner

Full legal name

Please outline the reasons for your belief. Use additional copies of this page as necessary, providing clear and specific information. If you refer to any documents please attach copies of these documents to this Schedule.

See attached.
Filing for Compliance Audit – Amir Farahi, Barry Phillips

June 27, 2019

Application for a Compliance Audit – Amir Farahi, Barry Phillips
Filed by Stephen Turner

1. Two websites were developed during the 2018 London municipal election campaign that actively campaigned against two registered candidates (Maureen Cassidy and Virginia Ridley) for council in the election.

2. The act of registering these web domains incurred a monetary expense.

3. Lawn signs were also purchased and placed promoting traffic to these websites.

4. The websites and lawn signs did not indicate who had commissioned or financed this advertising.

5. The act of a third-party advertising in support or opposition of a candidate constitutes third party advertising as defined under the Municipal Elections Act S.1(1) and requires registration with the Clerk of the Municipality. The activity discussed in this filing meets this definition under the Act.

6. There were three registered third-party advertisers in the 2018 London Ontario municipal election campaign, none of which claimed association with these activities.

7. The Municipal Clerk’s office had the signs removed as they did not comply with the regulations regarding third-party advertising.

8. Candidates Cassidy and Ridley were required to seek a court order to compel the web domain registries to release information regarding who had registered and purchased the domains.

9. The court ordered information identified that Amir Farahi had purchased these domains.

10. Mr. Farahi had previously denied any association with these domains.

11. Mr. Farahi is also an owner of Blackridge Strategies, a communications firm whose services had been retained by opponents of Ms. Cassidy and Ms. Ridley to provide services related to various aspects of the election campaigns of Paul Van Meerbergen in Ward 10 and Randy Warden in Ward 5.

12. Mr. Farahi is also a former candidate in the 2014 London, Ontario municipal election.
13. Mr. Farahi was disqualified from running in the 2018 municipal election as a result of failure to file his campaign financial information with the City Clerk by the indicated deadline.

14. Mr. Farahi subsequently filed an application through the Ontario Superior Court of Justice seeking relief from the disqualification penalty.

15. Mr. Farahi was successful in his application and the disqualification was deemed not to apply.

16. Mr. Farahi’s experience in appealing his disqualification demonstrates his strong familiarity with the obligations set out in the Municipal Elections Act regarding elections finances and reporting.

17. Blackridge Strategies, as an agent for multiple candidates in the 2018 London, Ontario municipal election would also require familiarity with the obligations as set out in the Act.

18. When the information confirming that Mr. Farahi had indeed purchased the web domains was released, Blackridge Strategies issued press releases stating that the information contained in the websites was “harsh but accurate”. The statement did not deny the firm’s involvement in the creation of the websites.

19. Since it was Mr. Farahi who was demonstrated to have completed the web domain registration and not Blackridge Strategies, the fact that Blackridge Strategies issued these press releases appears to also indicate the firm’s involvement with the creation of the websites.

20. Mr. Barry Phillips, a campaign volunteer for Paul Van Meerbergen’s election campaign later admitted to CTV news that he had commissioned Blackridge Strategies, and paid them $1000, for the website campaigning against Ms. Ridley.

21. The Committee will also need to determine whether this constituted an undisclosed donation to Mr. Van Meerbergen’s campaign or if it constitutes illegal, unregistered third party advertising by Mr. Phillips.

22. No one has claimed responsibility for commissioning the website and signs campaigning against Ms. Cassidy.

23. Mr. Farahi, however, paid for the registration of this web domain.

24. Mr. Warden in a statement to the media, however, did accept responsibility for the fact that the act of commissioning the website had likely been done by agents or volunteers of his campaign without his knowledge.
June 27, 2019

Application for a Compliance Audit – Amir Farahi, Barry Phillips
Filed by Stephen Turner

It is being argued that the evidence presented here indicates clear violations of the aforementioned sections of the Municipal Elections Act, specifically with regard to the requirement to register as a third-party advertiser when spending money to advertise in support or opposition of any candidate in the municipal election and to file financial disclosures with the Clerk at the end of the campaign period. Registration and financial filings did not occur in these circumstances. It is recognized that since financial filings did not occur, it is impossible for the Compliance Audit Committee to conduct an audit, however, the Committee’s mandate is to determine whether there is sufficient grounds to believe that an infraction of the financial provisions of the Act did occur, and if so, to determine whether to refer these matters to the courts. Given the extent to which Mr. Farahi appears to have attempted to prevent discovery of his involvement with this advertising, and the fact that it would be difficult for him to claim he lacked knowledge of the regulations surrounding the financing of municipal elections campaign, it is here being requested that the Committee refer this matter for hearing before the courts.
FOR IMMEDIATE RELEASE

Blackridge Strategy
617 Wellington Street
London, ON N6A 3R6
226-448-9763
connect@blackridgestrategy.com

RELEASE DATE:
Tuesday, June 4 2019

BLACKRIDGE STRATEGY RESPONDS TO FALSE ALLEGATIONS
BY THE MEDIA, POLITICIANS

LONDON - Late last week allegations were made regarding Amir Farahi and Blackridge Strategy’s involvement in the creation of two websites commenting on the actions of Ward 5 City Councillor Maureen Cassidy and former Ward 10 City Councillor Virginia Ridley that were published during the 2018 municipal campaign.

The media has willfully misrepresented the content of these websites as being slanderous and non-factual when the information presented on each website reflected verified, albeit harsh, facts.

Blackridge Strategy is a high-growth, highly effective public affairs firm that develops and executes winning campaign strategies for our clients. Success in our line of business can be disruptive, naturally creating critics and outright opponents. These opponents have leveraged interested and dishonest media relationships to act as judge, jury, and executioner by misrepresenting and sensationalizing the situation to attack us individually and harm the reputation of our firm.

Londoners deserve the facts to decide for themselves.

The entirety of the content presented on each website was factual, reflective of City Hall meeting minutes that are accessible to the public as well as verified, responsible reporting.
The following is an exhaustive list of the information communicated on each website:

**On Ward 5 City Councillor Maureen Cassidy**
- Had a sexual affair with Mayor Matt Brown violating three separate areas of the Council Code of Conduct;
- Voted in favour of Bus Rapid Transit;
- Voted to make London a ‘Sanctuary City’ safe haven for illegal migrants, and;
- Voted in favour of an emergency motion to restrict freedom of speech.

**On Ward 10 City Councillor Virginia Ridley**
- Filed thousands of dollars in blatantly inappropriate and unnecessary expenses on the taxpayer’s dime, such as exorbitant fuel, parking, and home internet bills;
- Subjected her 7-year-old child to a marathon 9-hour budget session on a Saturday;
- Voted in favour of Bus Rapid Transit;
- Voted to make London a ‘Sanctuary City’ safe-haven for illegal immigrants, and;
- Voted in favour of an emergency motion to restrict freedom of speech.

While these websites may have resulted in hurt feelings, the information presented on each page accurately reflected choices Councillors Cassidy and Ridley made as elected officials.

The public has the right to hold politicians to a higher standard of responsibility, ethics, and integrity. The public also has the right to know about and actively critique the activities of their elected representatives—particularly when those activities are subject to investigation, compromise codes of conduct, and betray the public interest.

These websites shone a light on the questionable and downright poor and unethical decisions made by Councillors Cassidy and Ridley in discharging their duties as elected officials. The presentation of information on these websites can be debated on the basis of political correctness but most certainly does not constitute unlawful behaviour of any kind.

The same, however, cannot be said about the regrettable, unethical, and unlawful behaviour of the media in response to this matter.

*Rest assured that we will be taking swift legal action to seek reputational damages against any and all individuals and organizations that have slandered our names and/or Blackridge Strategy.*

We look forward to vigorously defending ourselves against these attacks and continuing to grow our business by delivering exceptional and unparalleled service to our clients.

###
Financial Statement - Auditor's Report
Form 4
Municipal Elections Act, 1996 (Section 78)

Instructions:
All candidates must complete Boxes A and B. Candidates exceeding contribution limits or incurring expenses beyond the nomination fee 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 his or her spouse) shall be paid immediately over to the clerk who was responsible for the conduct of the election.

For the campaign period from (day candidate filed nomination) YYYY MM DD to YYYY MM DD

☑ Primary filing reflecting finances to December 31 (or 45th day after voting day in a by-election)
☐ Supplementary filing including finances after December 31 (or 45th day after voting day in a by-election)

Box A: Name of Candidate and Office
Candidate's name as shown on the ballot
Last Name
FARAH
Given Name(s)
AMIR
Name of office for which the candidate sought election
City of London
Ward name or no. (if any) 6
Name of Municipality

Spending limit issued by clerk
$ 23,998.35

☐ I did not accept any contributions or incur any expenses other than the nomination fee. (Complete Box A and B only)

Box B: Declaration
I, Amir Farah, a candidate in the municipality of London, Ontario, hereby declare that to the best of my knowledge and belief that these financial statements and attached supporting schedules are true and correct.

Declared before (clerk or commissioner)
in the City of London
on (yyyy/mm/dd) 2015/03/07

Signature of Clerk or Commissioner

Date Filed in the Clerk's Office (yyyy/mm/dd) 2015/03/07

Signature of Candidate

SARAH CORMAN, a Commissioner for taking Affidavits and Oaths, Middlesex County, while a deputized Clerk of The Corporation of the City of London.
# 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)
Refund of nomination filing fee
Sign deposit refund
Revenue from fund-raising events not deemed a contribution (From Part III of Schedule 2)
Interest earned by campaign bank account
Other (provide full details)
  1. 
  2. 
  3. 
Total Campaign Income (Do not include loan)

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

### Expenses subject to spending limit
Nomination filing fee
Inventory from previous campaign used in this campaign (list details in Table 5 of Schedule 1)
Advertising
Brochures/flyers
Signs (including sign deposit)
Meetings hosted
Office expenses incurred until voting day
Phone and/or Internet expenses incurred until voting day
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. Transaction Fees (Paypal) 
  2. 
  3. 
Total Expenses subject to spending limit

### Expenses not subject to spending limit
Accounting and audit
Cost of fund-raising events/activities (list details in Part IV of Schedule 2)
Voting day party/appreciation notices
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 candidate’s disability (provide full details)
  1. 
  2. 
  3. 
Other (provide full details)
  1. 
  2. 
  3. 
Total Expenses not subject to spending limit

Total Campaign Expenses (C2 + C3)

9503P (2013/11)
### Box D: Calculation of Surplus or Deficit

<table>
<thead>
<tr>
<th>Description</th>
<th>Calculation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Excess (deficiency) of income over expenses (Income – Total Expenses) (C1 – C4)</td>
<td>+ $ ( \bigcirc ) ( \text{D1} )</td>
</tr>
<tr>
<td>Eligible deficit carried forward by the candidate from the last election</td>
<td>– $ ( \text{D2} )</td>
</tr>
<tr>
<td>Total (D1 – D2)</td>
<td>= $ ( \text{D3} )</td>
</tr>
<tr>
<td>If there is a surplus, deduct any refund of candidate’s or spouse’s contributions to the campaign</td>
<td>– $ ( \text{D3} )</td>
</tr>
<tr>
<td>Surplus (or deficit) for the campaign</td>
<td>= $ ( \text{D3} )</td>
</tr>
</tbody>
</table>

If line D3 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.

Amount of $ \( \underline{\text{________________________}} \) paid to municipal clerk in the municipality of \( \underline{\text{________________________}} \).
### Schedule 1 - Contributions

#### Part I – Summary of Contributions

- Contribution from candidate (include the value of inventory listed in Table 5) 
- Contribution from spouse

**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 candidate or spouse).

**Total value of contributions exceeding $100 per contributor** (from line 1B, list details in Tables 1 – 4)
- Include ticket revenue, contributions in money, goods and services where the total contribution from a contributor exceeds $100 (do not include contributions from candidate or spouse).

**Less:** Contributions returned or payable to the contributor
- Contributions paid or payable to the clerk, including contributions from anonymous sources exceeding $10

**Total Amount of Contributions (Record in Box C)**

#### Part II – List of Contributions from Each Single Contributor Totalling more than $100

<table>
<thead>
<tr>
<th>Name</th>
<th>Full Address</th>
<th>Amount $</th>
</tr>
</thead>
<tbody>
<tr>
<td>Robert Anderson</td>
<td>767 Headley Drive London ON N6H 3V7</td>
<td>750</td>
</tr>
<tr>
<td>Nahid Iravani</td>
<td>25 Sanderson Court Richmond Hill Ontario L4C 5L3</td>
<td>650</td>
</tr>
<tr>
<td>gharavi</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Matt Ross</td>
<td>500 Everglade Crescent London Ontario N6H 4L4</td>
<td>500</td>
</tr>
<tr>
<td>Mark Henshaw</td>
<td>1010 Harrison Ave London ON N6R 2V2</td>
<td>1000</td>
</tr>
<tr>
<td>Bruce &amp; Barb Feornall</td>
<td>42 Normandy Gardens London ON N6H 4A9</td>
<td>300</td>
</tr>
<tr>
<td>Adam Feornall</td>
<td>42 Normandy Gardens London ON N6H 4A9</td>
<td>10</td>
</tr>
<tr>
<td>Name</td>
<td>Full Address</td>
<td>Amount $</td>
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</table>

- Additional information is listed on separate supplementary attachment

**Total**: $2310

### Table 2: Monetary contributions from corporations or unions

<table>
<thead>
<tr>
<th>Name (Legal and Carrying on Business As)</th>
<th>Full Address</th>
<th>President or Business Manager</th>
<th>Authorized Representative</th>
<th>Amount $</th>
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- Additional information is listed on separate supplementary attachment

**Total**

### Table 3: Contributions in goods or services from individuals other than candidate or spouse

(Note: must also be recorded as expenses in Box C)

<table>
<thead>
<tr>
<th>Name</th>
<th>Full Address</th>
<th>Description of Goods or Services</th>
<th>Value $</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mark Henshaw</td>
<td>1010 Harrison Ave. London, Ontario N5L 2V2</td>
<td>Printing of flyers</td>
<td>$58.30</td>
</tr>
<tr>
<td>Adam Fernall</td>
<td>42 Normandy Gardens London, Ontario N6H 4A9</td>
<td>Postcard flyers</td>
<td>$378.51</td>
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</tbody>
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<tr>
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</table>

9503P (2013/11)
<table>
<thead>
<tr>
<th>Name</th>
<th>Full Address</th>
<th>Description of Goods or Services</th>
<th>Value $</th>
</tr>
</thead>
<tbody>
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<td></td>
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☐ Additional information is listed on separate supplementary attachment

Total $436.81
## Table 4: Contributions in goods or services from corporations or unions
(Note: must also be recorded as expenses in Box C)

<table>
<thead>
<tr>
<th>Name of Corporation (Legal and Carrying on Business As)</th>
<th>Full Address</th>
<th>President or Business Manager</th>
<th>Authorized Representative</th>
<th>Description of Goods or Services</th>
<th>Value $</th>
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☐ Additional information is listed on separate supplementary attachment

Total Part II Contributions (Add Totals from Tables 1–4) (Record in Part I – Summary)

\[ \text{Total} = \$2746.31 \]

## Part III – Inventory

Table 5: Inventory of Campaign Goods and Materials from Previous Campaign used in this Campaign
(Note: value must be recorded as a contribution from the candidate and as an expense)

<table>
<thead>
<tr>
<th>Description</th>
<th>Date Acquired (yyyy/mm/dd)</th>
<th>Supplier</th>
<th>Current Market Value $</th>
<th>Quantity</th>
<th>Total Value $</th>
</tr>
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</table>

9503P (2013/11)
<table>
<thead>
<tr>
<th>Description</th>
<th>Date Acquired (yyyy/mm/dd)</th>
<th>Supplier</th>
<th>Current Market Value $</th>
<th>Quantity</th>
<th>Total Value $</th>
</tr>
</thead>
<tbody>
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</tbody>
</table>

☐ Additional information is listed on separate supplementary attachment

Total

9503P (2013/11)
### Schedule 2 – Fundraising Events and Activities

**Fundraising Event/Activity**
Complete a separate schedule for each event or activity held

- Additional schedule(s) attached

<table>
<thead>
<tr>
<th>Description of fundraising event/activity</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of event/activity (yyyy/mm/dd)</td>
<td></td>
</tr>
</tbody>
</table>

#### Part I – Ticket Revenue
**Admission charge (per person)**
(If there are a range of ticket prices, attach complete breakdown of all ticket sales)

<table>
<thead>
<tr>
<th>+ $</th>
<th>2A</th>
</tr>
</thead>
<tbody>
<tr>
<td>( \times )</td>
<td>2B</td>
</tr>
</tbody>
</table>

**Total Ticket Revenue (2A \( \times \) 2B) (Include in Schedule 1) = $**

#### Part II – Other revenue deemed a contribution
(Provide details (e.g. revenue from goods sold in excess of fair market value))

1. + $
2. + $
3. + $
4. + $
5. + $

**Total Part II Revenue (include in Schedule 1) = $**

#### Part III – Other revenue not deemed a contribution
(Provide details (e.g. contributions of $10 or less; market value of goods or services sold))

1. + $
2. + $
3. + $
4. + $
5. + $

**Total Part III Revenue (include in Box C) = $**

#### Part IV – Expenses related to fundraising event or activity (provide details)

1. + $
2. + $
3. + $
4. + $
5. + $
6. + $
7. + $
8. + $

**Total Part IV Expenses (include in Box C) = $**
### Auditor's Report

**Municipal Elections Act, 1996 (Section 78)**

A candidate who has received contributions or incurred expenses in excess of $10,000 must attach an auditor's report.

#### Professional Designation of Auditor

<table>
<thead>
<tr>
<th>Municipality</th>
<th>Date (yyyy/mm/dd)</th>
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</thead>
<tbody>
<tr>
<td></td>
<td></td>
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</tbody>
</table>

#### Contact Information

<table>
<thead>
<tr>
<th>Last Name</th>
<th>First Name</th>
<th>Licence Number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Address</th>
<th>Street No.</th>
<th>Street Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suite/Unit No.</td>
<td></td>
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</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>City/Town</th>
<th>Province</th>
<th>Postal Code</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Telephone No. (including area code)</th>
<th>Fax No.</th>
<th>Email Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>ext.</td>
<td></td>
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</tr>
</tbody>
</table>

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

- [ ] Report is attached

---

Personal information, if any, collected on this form is obtained under the authority of sections 78 and 95 of the Municipal Elections Act, 1996. Under section 85 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.
Cassidy opponent Randy Warden says smear website 'ultimately my responsibility'

Former London civic election candidate Randy Warden is claiming “responsibility” for an attack website targeting his opponent, Ward 5 Coun. Maureen Cassidy, a week after the head of a firm who worked on his campaign was linked to the site’s creation.

Megan Stacey Updated: June 6, 2019
Former London civic election candidate Randy Warden is claiming “responsibility” for an attack website targeting his opponent, Ward 5 Coun. Maureen Cassidy, a week after the head of a firm who worked on his campaign was linked to the site’s creation.

Warden insisted he knew nothing about the smear website until it went public, but said he regrets the controversy has “distracted attention from those topics truly important to our community.”

“Having since learned that these efforts were done by either agents or volunteers with my best interest at heart, this happened on my watch and ultimately, my responsibility,” Warden said of the attack website in a Thursday statement.
Warden was a client of Blackridge Strategy, whose co-owner Amir Farahi was linked in court documents to the creation and payment of two smear websites during the fall civic election campaign.

Warden's statement included an apology to his “agents and army of volunteers” for any negativity that may have affected them in recent days since Blackridge became embroiled in controversy.

“To my agents and army of volunteers, I appreciate the hard work provided me through my campaign. I regret any ambiguity in our relationship that resulted in so much negative exposure of late. For these aforementioned shortcomings, respectively, you have my sincere apology.”

The websites took aim at then-incumbent politicians, Ward 5 Coun. Maureen Cassidy and Virginia Ridley, the former Ward 10 councillor, **attacking their personal lives and voting records** on issues like bus rapid transit.

In Ridley's case, the website included an allegation of child abuse because she took her son to a Saturday budget meeting in 2016.

The documents — ordered released by a court last week — show both websites were registered and built under the name Amir Farahi, and billed to his personal credit card. They were later transferred to someone named Ronald Young.

On Tuesday, Blackridge Strategy **released a statement** — circulated by Farahi, his first response of any kind since the court documents were made public — doubling down on the content of the websites.

All the information is true, though “harsh,” the company argued in its statement.

It may have resulted in hurt feelings, but was all based on city hall meeting minutes and “verified, responsible reporting,” the statement read.
Ward 10 Coun. Paul Van Meerbergen, who also used Blackridge Strategy to help with his campaign, has said he had nothing to do with the website against Ridley.

He told radio station 980 CFPL that a Free Press story suggesting he had “some explaining to do” was “bogus.”

In an e-mail to The Free Press Thursday night, Van Meerbergen called Warden’s effort to take ownership of the website “entirely misplaced.”

“Mr. Warden has said he has nothing to do with the website and yet he is willing to take full responsibility for it. His responsibility is entirely misplaced. This is a Blackridge problem . . .”

Blackridge was involved in the election campaigns of at least 12 council and school board candidates, most of them opposed to the city’s controversial bus rapid transit plan.

mstacey@postmedia.com
twitter.com/MeganatLFPress

TIMELINE

May 28, 2018: Domain name maureencassidy.ca is re-registered by Amir Farahi, and a credit card registered to him is charged $12.42 for one-year rights to the name.

Sept. 17, 2018: Domain name virginiaridley.ca is registered by Farahi, and a credit card registered to him is billed $12.42 for one-year rights to the name.

Sept. 24, 2018: Two websites, maureencassidy.ca and virginiaridley.ca are created using Wix.com and billed to Farahi.
Oct. 2, 2018: Signs appear in Cassidy’s north-end ward mimicking her own election signs but directing people to the attack website.

Oct. 3, 2018: Facebook posts claiming to share “The Truth About Virginia Ridley” appear on the social media platform, including a link to virginiaridley.ca.

Oct. 3, 2018: The registration for both websites is transferred to “Ronald Young” of 38 Lavender Way in London. (No person by that name lives there, the home’s owners said.)

Oct. 3–4, 2018: Both websites are taken down.

Oct. 22, 2018: Cassidy is re-elected in Ward 5. Ridley loses in Ward 10 to Coun. Paul Van Meerbergen, who previously represented the ward but was beaten by Ridley in 2014.
Digital dirty tricks sandbag a second female London politician

Two days, two fake campaign websites, two smear jobs.

Megan Stacey Updated: October 3, 2018

Two days, two fake campaign websites, two smear jobs.

If there’s any doubt about below-the-belt politics in London’s civic election campaign, a second fake campaign website — another targeting a left-leaning woman seeking re-election — surfaced Wednesday, adding a new layer to the digital dirty tricks seen in this election.

Observers warn it’s unlikely to be the end of the rough stuff online, the new battleground for negative campaigning.

Coun. Virginia Ridley is the second city politician to be targeted with a website bashing her voting record and personal life. One page on the site, since taken down, alleges she committed “child abuse” by taking her young son to a long weekend city council budget meeting in 2016.

Ridley rejects that claim, saying it’s “not true or reflective of what happened,” but notes the wider issue is the fake news quality of the attack which she told The Free Press “really feels personal.”
Ward 10 Coun. Virginia Ridley plays with her sons Andrew, 10, left, and Ben, 9 at her home. (DEREK RUTTAN, The London Free Press)

“Any time someone wants to criticize my position on policies, that’s fair game,” the Ward 10 councillor said.

“But this is false, a significant allegation and an attack to my character and the person I am. I don’t think it’s acceptable.”

One political expert says what stands out to her about the attacks — earlier this week, it was Coun. Maureen Cassidy who found herself victimized by a fake campaign site eerily similar to the one that went after Ridley — is that the targets both are women.

“I think what’s really compelling is it’s a gendered attack,” said Jacquetta Newman, a political science professor at King’s University College, She
points to double standards about women politicians abandoning their children and stereotypes about women as big self-spenders.

“These fake news sites are using historical gender means to discredit these two candidates.”

The site, taken down at some point Wednesday, described Ridley as “a colossal spendthrift, greedy, irresponsible.” A link to the site was posted on a Facebook page called the Truth about Virginia Ridley.

It appeared online one day after fake election signs cropped up in north London's Ward 5, directing voters to a website bashing Maureen Cassidy for her views, voting record and alleged lack of integrity.

Cassidy had an affair with Mayor Matt Brown earlier in this council’s term.

Compared to old-school dirty tricks, like nasty flyers, social media and digital platforms make it easier to launch political attacks, says a Fanshawe College professor who specializes in digital marketing and management.

“It’s low-risk, so we’re going to see more and more of this,” Trent Cruz said. “There’s a greater risk of setting up flyers somewhere; someone might see you stapling them.”

Ridley acknowledged the attack site on social media, saying “I’m going to pay very little attention to it because that’s what it deserves.”

The sites – extremely similar in style and content – were set up to look like legitimate political websites, using the candidates’ names as the domain. Both have since been removed. The Free Press could not verify who was behind them.

Cruz said that’s likely the appeal. It’s easy to hide the trail behind sponsored
Facebook posts and anonymously created websites. And the nature of social media often helps those pointed attacks spread like wildfire.

“It has a much greater reach and there’s a kind of cyclical echo chamber effect. Because it has a greater reach, you’re more likely to report on it,” he said.

It also makes it difficult to track the creators.

City clerk Cathy Saunders said activities that don’t include spending money don’t violate the third-party advertising rules under Ontario’s municipal elections law.

That includes social media posts.

Newman suggested the two women were likely targeted because they’re incumbent politicians, a significant threat to competitors.

“Of all the women running right now, they are the most competitive,” she said. “The fact is, they’re both incumbents. These attacks are basically trying to kill the king.”

The sites take aim at Cassidy and Ridley for voting in favour of London’s contentious $500-million bus rapid transit project, a pay raise for ward councillors – both of which were supported by a majority of council – as well as a unanimous, anti-hate motion crafted on the floor of council that came under fire for its potential to quash free speech in public spaces.

Former mayor Joni Baechler, who publicly endorsed Cassidy in 2014 when she ran for Baechler’s former Ward 5 seat, called the sites “appalling and shameful.”

“There’s lots of dirty tactics employed during campaigns that are difficult to
deal with, but this is a whole new level of anonymous, underhanded action, trying to destroy the reputation of two high-quality women on council,’’ she said.

mstacey@postmedia.com

twitter.com/MeganatLFPress
ONTARIO
SUPERIOR COURT OF JUSTICE

THE HONOURABLE M. A. CARSON

TUESDAY

5TH DAY OF DECEMBER, 2017

BETWEEN:

AMIR FARAH
Applicant

- and -

THE CORPORATION OF THE CITY OF LONDON
Respondent

JUDGMENT

THIS APPLICATION was heard this day, without a jury, at 80 Dundas Street, London ON, in the presence of the lawyer for the Applicant.

ON READING THE NOTICE OF APPLICATION AND THE EVIDENCE FILED BY THE PARTIES, on hearing the submissions of counsel for the Applicant, and upon reading the letter dated November 20, 2017 from counsel for the Respondent, advising that the Respondent does not oppose the relief sought in the Application,

1. THIS COURT ORDERS that the Notice of Default dated March 31, 2015, whereby the Applicant was ruled ineligible to be elected or appointed during the next election, does not apply to the Applicant on the basis of de minimis non curat lex with respect to the timing of his Form 4 Auditor’s Report Financial Statement filings, and the Applicant is hereby relieved of such penalties.
2. THIS COURT FURTHER ORDERS that there be no costs awarded in this Application.
AMIR FARAH v. THE CORPORATION OF THE CITY OF LONDON

Court File No.: 2543/17

ONTARIO
SUPERIOR COURT OF JUSTICE

Proceeding commenced at London ON

JUDGMENT

LERNERS LLP
85 Dufferin Ave P.O. Box 2335
London ON N6A 4G4

Andrew C. Murray LS#: 35106T
Tel: 519.640.6313 / Fax: 519.932.3313
Lawyers for the Applicant

ACM/kh #110177-00001
Illegal signs, anonymous website bash Cassidy's city hall record

Call it fake news meets drive-by smear.

Updated: October 3, 2018

Call it fake news meets drive-by smear.

A London city councillor who weathered a personal scandal this term has found herself targeted in election signs questioning her integrity and directing voters to a fake campaign website.

The attack against Ward 5 incumbent Maureen Cassidy — the signs are illegal, and have to come down since they don’t belong to Cassidy but also don’t spell out who’s behind them — smack of American-style campaign negativity creeping into elections in Canada, to one former city politician.

But it’s also possible the move could backfire and help Cassidy, one political scientist who specializes in local government says.

“Whoever is doing this is unlikely to undermine Maureen Cassidy’s position in the campaign. If anything, I think this tactic would give her a little more sympathy and support,” said Martin Horak, of Western University.

“Before, when we’ve seen things like sign vandalism, if anything, it works to the advantage of the person who has been the victim of foul play,” he said.
A handful of election signs that popped up along Richmond Street target Coun. Maureen Cassidy by taking aim at her integrity and promoting a negative website that questions her views, votes and record. (MEGAN STACEY, The London Free Press)

Modelled after Cassidy’s own election materials, the signs that sprung up along Richmond Street appear professionally made and even use the same colour scheme as Cassidy’s own signs. But the offending signs are distinguished by the word “integrity?!?!” that appears beneath her name.

Cassidy, running for a second term in the north-end ward, declined to comment on the signs and the anonymous website to which it directs voters. The Free Press was unable to verify the site’s creator.

“If anybody wants to talk about the issues that are important to Londoners
and to the people in Ward 5, I’m happy to talk openly, in a public forum. But first they have to come out of the shadows,” Cassidy told The Free Press.

Former city hall veteran Gord Hume, an author who now speaks and writes about civic government, said he sees negative, American-style campaign tactics coming across the border.

“The attitudes, the viciousness that we saw in the 2016 U.S. election, some of that mentality has seeped across the border,” said Hume, a former ward councillor and member of council’s now-defunct board of control.

“It’s almost as if people feel it has to be a negative campaign . . . that’s very damaging for London,” he said. “I’ve always thought elections should be about vision or positive change.”

The signs violate Ontario’s municipal election law, since they appear to be third-party political commentary but lack a clear statement about who paid for them. Any person or group that wants to spend money to promote or oppose a candidate is required to register with the city’s elections office as a third-party advertiser.

City clerk Cathy Saunders, overseeing London’s civic election, said city hall would remove any signs that violate the law.

The signs also advertise a website, dedicated to bashing Cassidy’s views and votes on issues such as bus rapid transit and the controversial “sanctuary city” label, and taking aim at her integrity based on an affair she had with Mayor Matt Brown in 2016.

The website draws on swaths of text from old media reports, without any attribution, to suggest “Councillor Cassidy cannot be trusted.”

Cassidy’s name is used as the site’s URL.
In 2016, Brown and Cassidy, then deputy mayor, admitted to a brief affair. London’s ethics watchdog launched a probe, which found the pair violated three sections of council’s code of conduct. The integrity commissioner declined to probe further.

Brown and Cassidy’s council colleagues voted to formally reprimand the pair, but gave no further punishment.

Several candidates running against Cassidy said they weren’t aware of the signs, but spoke against them.

“I wouldn’t support that kind of behaviour,” Randy Warden said. He ran second to Cassidy in the 2014 election, taking 17.5 per cent of the vote to her 57 per cent.

Another Ward 5 challenger, Charles Knott, said the signs and the website “go a step too far.”
Lawyer: Documents prove smear websites were launched by campaign strategist Amir Farahi, mystery man

[Megan Stacey] Updated: June 11, 2019

A legal fight quietly launched by two city council candidates who were smeared by anonymous websites during last fall’s civic election has uncovered evidence they say proves it was the handiwork of local campaign organizer Amir Farahi and another London man.

The websites, launched during the eight-week fall campaign, attacked
Maureen Cassidy and Virginia Ridley for their voting records and personal lives. Ridley’s website, for example, included allegations of child abuse for taking her son to a weekend budget debate in 2016.

Cassidy won re-election in north-end Ward 5; Ridley was ousted by Paul Van Meerbergen in west-end Ward 10. Many suspected Farahi and his firm, Blackridge Strategy.

Documents, made public Thursday, show Farahi and another Londoner named Ronald Young were registered as the creators of the two smear websites.

But Farahi not only denied it, he argued he was the victim of a conspiracy in which unnamed rivals who knew his cellphone number used it to register the websites – all part of an effort, Farahi argued, to “frame” him.

Farahi and Young did not immediately return Free Press calls seeking comment Thursday.

Now, however, Cassidy and Ridley, led by London lawyer Susan Toth, have made public documents from website firms wix.com and godaddy.com as well as the Canadian Internet Registration Authority – which a Superior Court judge ordered to be handed over – that point to Farahi as the creator.

The two websites, quickly taken down, were registered by Farahi and linked to an email address, his cellphone number and his home address, the documents show.

“This (court) order was necessary to lift the veil of anonymity that internet users may rely on to avoid liability. This was not just one off-the-cuff tweet or blog. Money and time was spent to attack two women candidates,” Toth said in a statement.

“This successful application shows that the internet is not a wild, wild west where comments can be made with impunity.”
Farahi’s only public comments on the matter were last fall, in a CTV London interview that reporter Daryl Newcombe called a post-election exclusive. In it, Farahi offered a bizarre conspiracy theory – that someone out to get him made the anti-Cassidy and anti-Ridley websites, using his personal information, so he would be blamed for them.

“The very faceless individuals who want to silence me and bring me down . . . decided to frame me by putting these websites out there and spreading a lie out there that I did it,” Farahi said, at one point choking up.

Blackridge Strategy is run by Farahi and Thames Valley District school board trustee Jake Skinner. It worked on at least 11 different campaigns in London’s 2018 municipal election – including Mayor Ed Holder’s.

The Cassidy attack website was advertised on lawn signs that were styled to look like the candidate’s own election advertisements, but with the phrase “Integrity?!?!?” added. Within hours of the Ridley website launching, the one-term city councillor had figured out how to link the website to Farahi’s cellphone number – which, while fairly convincing, was not definitive proof.

“It was important to us to go through the process of obtaining the information and then making that information available to the public,” Cassidy said Thursday.

“I wanted to find a way to discourage these kinds of attacks in future campaigns by showing that this information can and will be obtained.”

Blackridge worked with rivals of both Cassidy and Ridley – Ward 5 candidate Randy Warden and Van Meerbergen in Ward 10, respectively.

**WHO IS RONALD YOUNG?**

The appearance of the name Ronald Young in the court documents presents something of a mystery so far. Young’s address is listed as 38
Lavender Way in London.

That came as a surprise to the woman who lives there, and answered the phone number for that address. There is no Ronald Young living there, she said.

She and her husband have been living there since 1994, she added.

Neither she nor her husband know anyone by the name of Ronald Young, and their only involvement in the last municipal election was to cast votes, she said.

Municipal tax records confirm that she and her husband pay the taxes on the property, not a Ronald Young.

A call to Young’s phone number listed in the court documents is answered by a message saying the text mail subscriber is not available, and to leave a message.
Volunteer admits paying Blackridge to create fake election website

By Daryl Newcombe, CTV London
Published Thursday, June 13, 2019 6:08PM EDT

A bombshell admission solves one of the biggest mysteries involving Blackridge Strategy's involvement in last year's election.

Who was behind the smear campaign that targeted former councillor Virginia Ridley?

CTV News speaks with a campaign volunteer who takes responsibility for the website, but not for the most controversial content.

The website Virginiaridley.ca was part of a smear campaign against Ridley.

It questioned her spending and position on Bus Rapid Transit, but also suggested it was child abuse when she once brought her son to a budget meeting at city hall.

Coun. Paul Van Meerbergen, who defeated Ridley in Ward 10, told CTV News earlier that he had no participation in the fake website.

Campaign volunteer Barry Phillips told Van Meerbergen on Monday he paid Blackridge Strategy more than $1,000 of his own money for the website. But he insists the child abuse claim was included by Blackridge Strategy without his knowledge or consent.

"That was not the intent. Basically Blackridge went and put all that stuff on there without my approval and basically just hijacked the platform and put that crap out there," Phillips says.

CTV News asked Phillips if he questioned Blackridge on why they did that. "No, I did not. I said, 'I've been duped.'"

Earlier this month documents were obtained by Ridley and Coun. Maureen Cassidy showing the websites virginiaridley.ca and maureencassidy.ca were registered under the name Amir Farahi and a fee was paid with a credit card under the same name.

Farahi is co-owner of political consulting firm Blackridge Strategy, which provided contracted services to Van Meerbergen and several other candidates during the campaign period.

Blackridge's news release last week defended the websites as harsh and hurtful but factual.

Van Meerbergen was asked if he thinks this warrants a compliance audit of this campaign?

“Well, certainly, someone could argue that. But I am here to say that we did not have any involvement in any way, financially included.”

An update to the Elections Act required so-called third party advertisers to register at city hall, keep financial records and follow rules including identifying the source of funding on advertisements.

None of that was done for the previously anonymous website for Ridley.

“That was not my intent. The intent was BRT-themed factual, not personal website,” Phillips says.

Van Meerbergen was also asked if she should resign as the website may have had an impact on the election results.
"Well I would say not. I have no knowledge of this, so I am not sure how you have no knowledge and then be responsible," he says.

Lawyer Susan Toth represents Ridley and Cassidy. She says her clients are not ready to comment on these new revelations.

CTV News reached out to Blackridge Strategy's Farahi and partner Jake Skinner, but there has been no response.
Application for Compliance Audit

Amir Farahi, Blackridge Strategies, Barry Phillips
Third Party Advertising (MEA definition)

“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),

but does not include an advertisement by or under the direction of a candidate or an advertisement described in subsection (2) or (2.1); (“publicité de tiers”)
Third Party Advertisements – Sect 88.4(1)

• **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.
Actions by Messrs. Farahi and Phillips and Blackridge Strategy appear contrary to S. 88.4

- Court records have shown that Mr. Farahi bought and paid for the web domains that carried messages actively campaigning against candidates Ridley and Cassidy. Lawn signs were also purchased to direct traffic to those websites.

- In media interviews, Mr. Phillips admits to acting independently and having paid $1000 to Blackridge Strategies to produce a website to campaign against candidate Ridley.

- In a press release, Blackridge Strategies contends that there was nothing inappropriate with the creation of these websites.

- No one has taken responsibility for commissioning the website or materials campaigning against candidate Cassidy.
Third Party Advertisements – Sect 88.5(1)

Mandatory information in third party advertisements

88.5 (1) No registered third party shall cause a third party advertisement to appear during the restricted period unless the advertisement contains the following information:

1. The name of the registered third party.
2. The municipality where the registered third party is registered.
3. A telephone number, mailing address or email address at which the registered third party may be contacted regarding the advertisement.

2016, c. 15, s. 48
All Mandatory Information Missing

• The websites and lawn signs did not contain any information required under this section of the Act.

• Steps were taken to obscure who was responsible for commissioning these websites and lawn signs.

• Mr. Farahi vehemently denied any involvement during an interview on CTV news in October 2018 but was later shown to have purchased the web domains himself.

• Mr. Phillips stated in media interviews that he had paid Blackridge Strategies to produce the website campaigning against candidate Ridley.
Registration of third party advertisers

Notice of registration

88.6 (1) An individual, corporation or trade union may, in person or by an agent, file with the clerk of the municipality responsible for conducting an election a notice of registration to be a registered third party for the election, and the notice must be filed in the prescribed form and must include a declaration of qualification signed by the individual or by a representative of the corporation or trade union, as the case may be. 2016, c. 15, s. 49.
No Filing as Third Party Advertiser

- According to the Clerk, there were only three registered third party advertisers – none of whom were involved in the creation of the websites or signs addressed in this filing.
- The respondents have conducted activities consistent with actions requiring registration as a third party advertiser.
- The respondents did not register as third party advertisers and therefore appear to have violated this section of the Act.
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.
Contribution to an unregistered third party advertiser

• Mr. Phillips, in his own admission, incurred an expense resulting in third party advertising.

• Mr. Phillips therefore either self-contributed to his own activity as a third party advertiser or contributed to Blackridge’s activity as a third party advertiser.

• In either case, a contribution can only be made to a registered third party advertiser as required by the Act. Blackridge nor Mr. Phillips were registered third party advertisers.

• Mr. Farahi, in registering and paying for both websites, also incurred an expense and therefore either acted as or contributed to an unregistered third party advertiser.
Third Party Advertisements – Sect 88.21(1)(5)

Registered third parties’ expenses

88.21 (1) An expense shall not be incurred by or under the direction of an individual, corporation or trade union in relation to third party advertisements that appear during an election in a municipality unless he, she or it is a registered third party in the municipality. 2016, c. 15, s. 59.

Who may incur expense

(5) An expense may only be incurred by a registered third party or an individual acting under the direction of the registered third party. 2016, c. 15, s. 59.
Expenses incurred without registration

• The expenses associated with the websites and signage campaigning against candidates Cassidy and Ridley were incurred by Mr. Farahi and Mr. Phillips.

• Messrs. Farahi and Phillips were therefore not eligible to incur expenses as per the Act.
Third Party Advertisements – Sect 88.29(1)

Financial statements, etc., of registered third parties

88.29 (1) On or before 2 p.m. on the filing date, a registered third party shall file with the clerk of the municipality in which he, she or it registered a financial statement and auditor’s report, each in the prescribed form, reflecting the registered third party’s campaign finances in relation to third party advertisements,

• (a) in the case of a regular election, as of December 31 in the year of the election; and

• (b) in the case of a by-election, as of the 45th day after voting day.

2016, c. 15, s. 61.
No Financial Statements Filed

- No financial statements were filed with the Clerk as would have been required had the respondents registered as third party advertisers.
- Without filing as third party advertisers, there were also no financial filings from the respondents to audit frustrating the intent of the legislation to ensure transparency in electoral expenses.
Compliance Audit Committee Mandate

The Committee is required to act in accordance with the powers and obligations set out in the Municipal Elections Act, 1996, as amended (MEA). The Committee will be required to:

• consider a compliance audit application received from an elector that a candidate or a registered third party has contravened provisions of the MEA relating to election campaign finances and determine whether it should be granted or rejected;

• if the application is granted, the committee shall appoint an auditor to conduct a compliance audit;

• receive the auditor’s report;

• consider the auditor’s report and if the report concludes that the candidate or registered third party appear to have contravened a provision of the MEA relating to election campaign finances, the committee may commence legal proceedings against the candidate or third party for the apparent contravention; and,

• consider the report(s) of the clerk identifying each contributor to a candidate for office on a council or a registered third party who appears to have contravened any of the contribution limits under section 88.9 or 88.13 of the MEA and decide whether to commence a legal proceeding against a contributor for an apparent contravention.
Compliance Audit Committee Mandate

• The activities presented meet the definition of Third Party Advertising however the parties involved did not register as third party advertisers.

• If not for the lack of registration, the activities being presented would clearly fall under the mandate of the Compliance Audit Committee.

• The lack of registration has therefore obstructed the ability of the committee to execute its mandate and, it is being argued, violated the Municipal Elections Act.
Summary of issue at hand

• Notwithstanding the nuance that indicates the committee’s mandate is with respect to registered third party advertisers, the legislation’s intent is clearly to ensure transparency in elections financing and the Compliance Audit Committee is the vehicle by which elections finances can be examined for consistency with the Act.

• If not for the omission of registering as third party advertisers, the activity would be clearly within the mandate of this committee.

• Failure to file should not be a manner by which one can bypass the oversight of your committee.
Request of the Compliance Audit Committee

- Make finding that the activities appear to have contravened the referenced sections of the Municipal Elections Act and that the activities identified would have required the respondents to register as third party advertisers.

- Given this finding, exercise the power within your mandate to “...commence legal proceedings against the...third party(ies) for the apparent contravention.”
July 19, 2019

SENT VIA E-MAIL TO: csaunder@london.ca

City Clerk
City Clerk's Office
City of London
PO Box 5035
London, Ontario
N6A 4L9

Attention: Ms. Saunder

Dear Ms. Saunder,

Re: Complaint to Compliance Audit Committee: Amir Farahi and Blackridge Strategy

We are the lawyers for Mr. Amir Farahi and Blackridge Strategy.

We understand that Stephen Turner commenced a complaint against our clients in connection with the 2018 Municipal Election (the “Complaint”) and that the Complaint is scheduled for a hearing in front of the City’s Compliance Audit Committee on July 26, 2019.

Due to our recent retainer in this matter and our need to fully and carefully review the Complaint and all matters associated therewith, we kindly request an adjournment of the hearing until a later scheduled date.

As a preliminary matter, we note as well that the placement of the Complaint on the Agenda for the City’s Compliance Audit Committee is troubling for a number of reasons.

First, the affidavit of Mr. Turner is unsworn. Accordingly, the Complaint is not compliant with the requirements of a valid Application as established by the City of London.

As set out on the City’s public website “The Application for a Compliance Audit Request must be completed and sworn in front of a commissioner…” The Application is in the form of an affidavit as well.

On this basis, the City ought not to have accepted Mr. Turner’s Application and his Complaint is improperly before the Compliance Audit Committee.

As set out in the Municipal Elections Act, 1996 (the “Act”), the clerk of a municipality is granted authority to establish administrative practices and procedures for a compliance audit committee. Those practices and procedures as represented to the public, including our clients, on the City’s website, and elsewhere, requires an Application to be duly sworn.
Second, our clients were not registered third party advertisers during the 2018 Municipal Election. This information would be duly known by the City of London.

The jurisdiction of a compliance audit committee under the Act is confined to hearing matters involving “candidates” and “registered third party” advertisers.

Our clients also have very serious concerns about the manner in which Mr. Turner is using his power as an elected official. To that end, I refer you to the meeting of London City Council held on June 11, 2019 (the “Council Meeting”).

Having reviewed the video of the Council Meeting, I took note of the following quote from the City Solicitor, Barry Card:

“Your worship, I have had the opportunity to confer with the Clerk about whether or not there is any possibility for recourse and I agree with her responses, I believe that the Municipal Elections Act was meant to be a code, and that the responsibilities of everyone, responsible for the Municipal Elections Act is set out in the code, but beyond that, usually if the legislation was occupied by an area and doesn’t provide Municipal powers, that’s a pretty good indication that it doesn’t go beyond what is in the act. But they have actually specified that in Section 88.7, and I wanted to bring that to your attention because the Councillor mentions Section 88.4 and suggests that there was a possibility of a contravention of Section 88.4 And what this provision says that if a municipality is satisfied that there’s been a contravention of section 88.3 88.4 or 88.5 the municipality may require a person who the municipality reasonably believes contravened this section or caused or permitted the contravention or the owner or occupier of the land on which the contravention occurred to remove the advertisement or discontinue the advertising. So that's all there is to it. And as the clerk said, that action was taken, uh, the signs were removed and the, uh, any advertising, whether or not it was advertising remains to be seen, but the activity ceased. So that exhausted what the municipality’s responsibility was and what the municipality’s power is and what the Councillor is really asking is well you know, that’s all and good, but there is a vacuum here, could we fill that vacuum by prescribing some other process and my answer to that is no, because we don’t have the jurisdiction to do that. So what happens with contraventions of the Act? Well it’s the same as any other provincial statute. It’s the duty of the police to investigate and lay charges where they consider appropriate, it’s not the function of the council to do that.”

In addition to the legal opinion of Mr. Card, I also took note of the following quote from the City Clerk:

“Through you Mr. Mayor, there is nothing in the Municipal Elections Act that provides authority for compliance audits to be undertaken for third parties that are not registered. The Act did provide the clerk with the authority if something did come to their attention at the time to take action and we did that, we removed the signs, we had…we did investigate the website and but the website was taken down. So that’s the only authorization the clerk has under the Act. The compliance audit complaints and applications are only in accordance with the Municipal Elections Act for registered third parties.”

On this basis, the City ought not to have accepted Mr. Turner’s Application and his Complaint should not have been placed on the City’s Compliance Audit Committee’s Agenda for July 26, 2019, where the allegations contained therein have now been wrongly made available to the public.
Given the foregoing, we trust that we will receive an immediate response to our request for an adjournment and
the preliminary matters raised, which we reserve the right to fully argue before the City’s Compliance Audit
Committee if the Complaint continues to proceed through this process.

Yours very truly,

GARDINER ROBERTS LLP

Bryan Skolnik
Managing Partner - Operations

e. client
July 23, 2019

Cathy Saunders
City Clerk
City of London
300 Dufferin Avenue
London, ON  N6B 1Z2

Dear Ms. Saunders

Please find my statement below for the Compliance Audit Committee hearing on July 26, 2019.

Sincerely

[Signature]
Barry Phillips
During the last Municipal campaign, I commissioned Blackridge Strategies to construct a factual website disclosing Virginia Ridley’s voting record on BRT issues. My intention in having the website created was to provide the public with factual, non-biased information to the public on how our ward’s councillor had voted on the BRT issue.

BRT is an important issue to my wife Kelly and I as over the years we have had conversations with several frustrated teenagers and young adults about how they were not hired for a factory job because they did not have reliable transportation. These job opportunities were located in London’s industrial parks. They were told that they needed to have a car as London Transit only runs on a part-time schedule and only covers a part of these areas. My wife and I believe that BRT is more for the “show case” routes that serve Western University and Fanshawe College. My wife and I believe that London needs a more equitable public transportation system that serves all areas of our city. This would be fair to all the people of London.

Conversations about the BRT, from both the pro BRT and anti BRT groups as well as the media were active in the spring of 2018 and then appeared to taper off. In the fall of 2018, My wife and I were waiting to see the councillors BRT voting records be presented by the media as this was a pretty important issue.

Frustrated that it appeared none was forthcoming, my wife and I decided to get the BRT voting record of our Ward 10 councillor out to the public ourselves.

The reason I chose to disclose Virginia Ridley’s voting record specifically was she was the councillor for my ward at the time and it was too expensive to disclose the voting records of all of the councillors.

My first contact was with Blackridge Strategy was during the summer of 2018. I was impressed by the number of clients they had for the 2018 municipal election. My wife and I agreed that we should see if Blackridge could create the website that we had in mind.

I met with Blackridge. They indicated that they had the research team that could dig into the BRT voting records. I asked them how they would direct
people to the website. They indicated that when anyone from the London, Ontario region would search for BRT, the website would show up as one of their top choices.

My instructions to Blackridge were to create a fact-based website simply disclosing Virginia Ridley’s voting record. My sole intention in having Blackridge create the website was to provide unbiased, neutral information to the public about how a councillor had voted on the BRT issue. My intention was not to persuade the public to vote in any particular way. My sole intention in hiring Blackridge to create the website was to inform the public so that voters could come to their own decision on which candidates to support.

The creation of the website seemed to be taking longer than what I had thought it should. I made several attempts to contact Blackridge during this time but seldom heard back and when I did the response was that they were busy. It was a frustrating time.

One evening in early October just before going to bed I checked my phone and saw that there was a message from Blackridge that the website was live. I awoke my wife to take a look as I could not believe what I was seeing. It was not at all what we had asked for.

As it was very late and we had a busy day the next day, my wife mentioned that there will unlikely be anybody searching for BRT in the next few hours and to come to bed and sort this out with Blackridge the next day.

The next day this website and another website were all over the media and both had already been taken off-line. We found out through the media that both websites that went live at around the same time and taken off-line at around the same time and that both had been live for mere hours.

Given what had happened, my wife and I realized that the BRT website we hired for would not transpire. This was a bad, and costly business experience.
To address the allegations against me:

I hired Blackridge Strategy to create a factual based BRT website on Virginia Ridley's BRT voting record. The website would not direct people on how to vote in the upcoming Municipal election.

I had no involvement in the creation of the website. I did not see the website until it was live.

The website was not what we had agreed upon and its release was not authorized by us.

Other than Blackridge Strategy, my wife and I were the only ones who knew about the creation of what was supposed to be a factual based BRT website. This was done completely outside of the Paul Van Meerbergen campaign. Paul Van Meerbergen had no knowledge of the creation of this website. We hired Blackridge in our capacity as private citizens, not in support of or against any particular candidate.

I now sorely regret ever having retained Blackridge to create a website. Had I known that Blackridge would create the website they did I would have never even entertained the thought of hiring them. I am truly sorry for the outcome of the website, and especially the impact on Virginia Ridley, and in hindsight I wish I had never hired Blackridge in the first place.
Cathy Saunders  
City Clerk  
City of London  
300 Dufferin Avenue  
London, ON N6B 1Z2

Dear Ms. Saunders

Please find enclosed my statement for Compliance Audit Committee hearing on July 26, 2019.

Sincerely

[Signature]
Kelly Phillips
BRT is an issue that is important to my husband Barry and I and, we believe, to people in our community. But, it seemed to disappear during the election. We thought it important to provide the public with information on how their councillors had voted on BRT issues. We wanted to give the public information that would allow the public to make informed decisions on who they were voting for. As such, Barry and I decided to have a website created to provide public information on the BRT issue. Specifically, we wanted to disclose the voting record of Virginia Ridley on the BRT issue. We chose to disclose the voting records of Virginia Ridley because she was our ward councillor at the time and it was too expensive to disclose the voting records of all of the councillors.

We chose Blackridge to create the site because they were creating many other websites in the context of this election. It should have been pretty basic public information on BRT voting records so it was very frustrating that the site seemed to take forever to complete.

Late one night, Barry showed me the site that was created, and I couldn’t believe it. It was appalling and so offensive. It was not even close to what we had asked for. The website was not what was agreed upon and its release was not authorized by us. We made plans to reach Blackridge the next day to have it pulled down.

As it turns out, the website and another website were in the media the next day and both had already been taken off-line.

It was never our intention to suggest how people should vote. We only wanted to provide information on the BRT issue for the public’s consideration.

Other than Blackridge Strategy, we were the only ones who knew about the creation of the website. At no time was Paul Van Meerbergen involved in this process.

This has been a very difficult time for us. We were not provided the factual BRT website that we paid for, yet my husband is being accused by the press for the inappropriate and insulting site that Blackridge did create and publish online.

We are now facing the harsh consequences of our decision to hire Blackridge. My husband has endured public condemnation through the media – newspapers, TV, online, and radio. The narrative in the media has been that my husband hired Blackridge to create a defamatory attack website against Virginia Ridley, which is not true. His reputation has been irreparably damaged and he and I have been subjected to harassment from the media at work and home. The Free Press even published our home address so we have had strangers banging on our door and cars watching out front of our house! A reporter even approached us while in our fenced backyard to ask us to respond to the allegations. It has been humiliating and very distressing.
My husband and I are extremely sorry for the website turning out how it did. We never had any intention for Blackridge to create such an offensive and unacceptable website. We wish we had never engaged Blackridge to create the website and we are extremely remorseful to the harm it caused Ms. Ridley.