



Application for a Compliance Audit Request

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

Joseph Francis

I, _____ of the City of London in the Province of

Full legal name

Ontario, MAKE OATH AND SAY [or AFFIRM]:

1. I am an eligible elector in the City of London by virtue of the fact that:
 - A. I am a Canadian Citizen;
 - B. I am at least 18 years of age as of October 24, 2022;
 - C. 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
 - D. I am not prohibited from voting under Section 17 (3) of the *Municipal Elections Act*, or otherwise prohibited by law.

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I have reasonable grounds to believe that _____ a Candidate or
 Name of candidate or Registered Third Party

Registered Third Party in relation to the October 24, 2022 Municipal Election for the City of London has contravened the following provision(s) of the *Municipal Elections Act*, S.O. 1996, c. 32 (Act)

_____ (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 labelled "Schedule A" and attach any supporting documents to the Schedule A].

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

SWORN [or AFFIRMED] before me at the City of London in the Province of Ontario on

2023 06 29

Date (YYYY-MM-DD)

Signature of applicant

Jeannie Raycroft, a Commissioner for

taking Affidavits and Oaths, Middlesex County,

Signature of Commissioner for taking affidavits while a deputized Clerk of The Corporation etc.

of the City of London.

Please see attached Schedule A.

Applicant's address: _____, London ON, N6B 3R5
 Applicant's telephone number: _____
 Applicant's e-mail address: _____

This application will be shared with the City Clerk, 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 Manager, Records and Information Services, 300 Dufferin Avenue, London ON (519) 661-2489 Ext. 5590.

Deadline for making 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's 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 Clerks Office, 300 Dufferin Avenue, London, Ontario.

Joseph Francis

Schedule "A"

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.

I believe that Mayoral Candidate Khalil Ramal has contravened the Municipal Elections Act under sections 88.8, 88.9, 88.25, and 88.19, and that additional sections may have also been contravened.

I believe that Khalil Ramal has contravened the Municipal Elections Act for the following reasons:

- 1) As expenses not subject to spending limits Mr. Ramal has listed \$2034 & \$339 for "Steel", which would seem to represent posts used to erect election signs. This expense is subject to the spending limit.
- 2) Despite having an active website, Mr. Ramal claimed no phone or internet expenses for the campaign period or listed any expenses related to website hosting or domain name registration.
- 3) In Table 3 of his Financial Form 4, Mr. Ramal has failed to list the Full Addresses of contributors over \$100, and in two cases has failed to even list a contributor name, including a donation of \$200 on September 8th where the name field is "N/A" and a second contribution of \$1000 on October 19th also listed N/A.
- 4) In Table 3 of his Form 4, Mr. Ramal disclosed a contribution from Sil Palumbo in the amount of \$1495, which exceeds the allowable \$1200 contribution limit a donor can make to any individual candidate.
- 5) In schedule 2 part III, Other revenue not deemed a contribution (provide details (e.g. contributions of \$25 or less; goods or services sold for \$25 or less) Mr. Ramal lists 3x50 on line 2, for contributions of \$150. However, these exceed \$25 or less revenue or sales if we believe the entry which lacks any other detail reflects 3 contributions of \$50.
- 6) That Mr. Ramal admitted to Blackburn News London that he did not follow the rules: <https://londonnewstoday.ca/news/2023/04/05/ramal-campaign-financials-include-violations-missing-info>

Finally, as Mr. Ramal's campaign exceeded \$10,000 according to his filing, a professional auditor's report is required. Mr. Ramal has only provided an email from an individual that does not certify an audit of his financial statements, or the validation methods used conforming to proper professional practice. Given the 5 discrepancies listed above, the validity of the auditor's "report" should also be in question.