

Doug Briggs  
Garry Michi Campaign Spokesperson  
July 17, 2023

Angie Cathrae  
Director of Legislative Services  
Clerk Town of South Bruce Peninsula  
P.O. Box 310, 315 George Street  
Warton, ON N0H 2T0

**Subject: Rebuttal to Compliance Audit Application - Garry Michi's 2022 Campaign Finances**

Dear Angie,

I hope this letter finds you well. I am writing to provide a rebuttal to the compliance audit application submitted by Douglas Jordon concerning Garry Michi's campaign finances during the 2022 Ontario municipal elections in the Town of South Bruce Peninsula. This rebuttal aims to address and refute the concerns raised by Mr. Jordon in his application, which was filed on June 19, 2023.

Throughout this response, we will carefully examine each of Mr. Jordon's concerns and present a comprehensive analysis to clarify any misconceptions or misinterpretations regarding Garry Michi's campaign finances. Our objective is to provide an accurate account of the expenses incurred and contributions received during the campaign, ensuring transparency and adherence to the applicable regulations.

By addressing these concerns head-on, we aim to alleviate any doubts or suspicions that may have been raised by the application, emphasizing the integrity and compliance of Garry Michi's campaign. Our response will outline the following key points:

- 1) **Office Expenses Post Voting Day:** We will provide a detailed breakdown of the \$1,278.92 claimed as post-election office expenses, demonstrating its legitimacy and relevance to the campaign. Additionally, we will address the discrepancy between pre-voting and post-voting office expenses, clarifying any misunderstandings.
- 2) **Corporate Contributions:** We will address Mr. Jordon's concern regarding contributions of \$7,500 from corporations. We will present evidence to verify that these contributions were not in violation of Ontario's campaign finance regulations, highlighting the legal framework and the candidate's compliance with the law.

- 3) **Maximum Contributions from an Individual:** We will address the claim that two contributions exceeded the maximum limit of \$1,200 from a single individual. Our response will provide evidence to refute this allegation and demonstrate compliance with the set contribution limits.
- 4) **Cash Donation Exceeded Limit:** We will thoroughly analyze the concern raised regarding a cash donation of \$100 exceeding the maximum allowable limit of \$25 from an individual. Through documented evidence, we will demonstrate that proper procedures were followed, and the alleged violation was handled appropriately.
- 5) **Hiding Campaign Costs:** We will provide a legitimized detailed breakdown of Mr. Jordan's claim that Mr. Michi's purchase of significant amounts of coffee cards from Tim Hortons in Wiarton suggested that these coffee cards were not claimed as a campaign expense and a deliberate attempt to hide campaign costs. Our response to this concern of hiding campaign costs and exceeding legal spending limits will provide clarification and negate this misconception, spelling out any misinterpretations.
- 6) **Undocumented Advertising Expenses:** We will address the claims that Mr. Michi sponsored a Labour Day Weekend concert in Sauble Beach and paid the promoter for the opportunity to post campaign signs across the venue and make a campaign speech on stage during the event. Our response will demonstrate that these allegations appear to be based solely on malicious gossip.

Our rebuttal seeks to shed light on the misrepresented claims and misconceptions outlined by Mr. Jordon in his compliance audit application. We are confident that a thorough examination of Garry Michi's campaign finances will affirm the candidate's commitment to transparency and adherence to legal requirements.

We appreciate your attention to this matter and look forward to the opportunity to provide a detailed response to each concern raised. Should you require any additional information or supporting documents, please do not hesitate to contact me at 519-534-2150. Thank you for your time and consideration.

Sincerely,

Doug Briggs  
Garry Michi Campaign Spokesperson

## **Rebuttal to Compliance Audit Application**

### **Garry Michi's 2022 Campaign Finances**

**Please find attached the following Financial Statements.**

- 1) Campaign Finances Detail (a pdf document)
- 2) Contributions and Campaign Income (a pdf document)

These financial statements are formal records that summarize the financial activities and position of Mr. Garry Michi's Campaign. They consist of two key statements: the Campaign Finances Detail statement, and Contributions and Campaign Income statement. Financial statements provide information about a campaign's financial performance, and overall financial spending. They are prepared by the organization's management and follow the 2022 Candidates' Guide – Ontario municipal council and school board elections.

An audit is an independent examination of a campaign's financial statements, processes, and internal controls by an external party known as an auditor. The purpose of an audit is to provide an objective assessment of the financial statements' accuracy, reliability, and compliance with accounting standards. The audit aims to enhance the credibility and trustworthiness of the financial statements for stakeholders, including contributors, and regulators.

Financial statements provide information to stakeholders, but they do not provide an absolute guarantee regarding their accuracy. They are based on the campaign's representations and assumptions. Conversely, an audit provides a level of assurance to users of the financial statements. The auditor's opinion, expressed in an audit report, adds credibility and reliability to the financial statements.

The audit process provides trust and transparency in the campaign's financial reporting.

#### **Our Response:**

Our response is to alleviate any doubts or suspicions that may have been raised by the application, emphasizing the integrity and compliance of Garry Michi's campaign. Our response will outline the following key points:

- 1) **Office Expenses Post Voting Day:** The auditors prioritize their examination on transactions and areas that are likely to significantly impact financial regulations. As part of their efforts, they meticulously verify dates and expense amounts. It is important to note that any expenses incurred after the election day of October 24, 2022, can be classified as post-voting office expenses, including costs related to parties and expressions of appreciation. For more detailed information, please refer to the attached Campaign Finances Detail document, provided as a PDF.
- 2) **Corporate Contributions:** During a discussion with Mr. Michi the Mayor, an inquiry was made to clarify the situation regarding campaign contributions. The candidate provided an explanation that sheds light on the matter. According to the candidate, there was a single contribution that could be attributed to a corporation, which resulted in an apparent over-contribution to the specific mayoral campaign as well as the overall election. The corporation in question, Sauble River Camp, was identified as the contributor.

The candidate clarified that the contribution from Sauble River Camp was included in the financial statement under the category of "contributions in money from candidate and spouse," with a specific amount reported as \$7,493.35. The candidate then proceeded to explain that although the contribution appeared to originate from a corporation and exceeded the allowable contribution limit for individual contributors, the candidate himself is the owner of Sauble River Camp. It was further revealed that the candidate maintains a single bank account, which is utilized for both personal and corporate transactions. In this setup, the candidate uses the Sauble River Camp bank account to make purchases for personal expenses, and the bookkeeper ensures that these expenses are appropriately separated in the ledger. In the context of opening an election-specific bank account, the candidate accessed funds from their sole bank account, which happens to be the Sauble River Camp account. The candidate clarified that the \$7,493.35 contribution made to open the election bank account did not exceed the permissible contribution amount for a mayoral candidate contributing to their own campaign. The candidate's perspective is that this money should not be regarded as a corporate contribution since it was simply a personal withdrawal from their only bank account, which happens to be under the name of Sauble River Camp.

Considering the candidate's explanation, it becomes evident that the situation arose due to the candidate's personal and corporate finances being intertwined within a single bank account. The candidate maintains that the usage of funds from this account for opening the election bank account should not be considered a corporate contribution, given its origin as a personal withdrawal.

Given the candidate's perspective and the circumstances surrounding his financial operations, it is apparent that the scenario above described did occur as explained.

- 3) **Maximum Contributions from an Individual:** Two Contributors wanted to pay both his and his life partner's contribution in full using a single check, the campaign staff accepted the verbal instructions and applied the contributions accordingly. They did so without malicious intentions and in what can be considered a business-like manner. Here is the reason explaining their actions.
  - Relationship: The campaign staff members had a longstanding relationship with the contributors and were familiar with the situation. They understood that the husband and partner's financial contributions were closely related. Both contributors' verbal instructions were seen as a genuine requests, and the campaign staff sought to accommodate them based on their knowledge of the contributors' circumstances.
  - Their actions were driven by factors such as presumption of authority, efficiency and convenience, and a sense of trust and good faith.
- 4) **Cash Donation Exceeded Limit:** We received a cash donation of \$100, which exceeded the maximum allowable limit of \$25 from an individual. However, in accordance with regulations, our campaign was required to submit this \$100 to the town clerk in good faith.
- 5) **Hiding Campaign Costs:** The auditors give priority to reviewing transactions and areas that have a substantial impact on financial regulations. In their thorough examination, they meticulously verify dates and expense amounts. It is crucial to understand that expenses such as the purchase of significant quantities of coffee cards from Tim Hortons in Wiarton were appropriately claimed as campaign expenses, and there was no intentional effort to conceal campaign costs. For additional information, please consult the enclosed Campaign Finances Detail document, available as a PDF.
- 6) **Undocumented Advertising Expenses:** Allegations made regarding Mr. Michi's alleged involvement in a Labour Day Weekend concert held in Sauble Beach. These allegations suggest that Mr. Michi sponsored the event, paid the promoter to display his campaign signs at the venue, and delivered a campaign speech on stage during the event. However, it is important to clarify that Garry Michi, as a responsible candidate, maintained a clear distinction between personal and campaign expenses. The allegation that Mr. Michi delivered a campaign speech during the event is not

supported by substantial evidence and is simply not true. Mr. Michi did not speak at this event. It is crucial to note that no evidence or proof has been provided to substantiate these claims, and they appear to be based solely on malicious gossip or unfounded rumors.

While it is accurate that the Labour Day Weekend concert took place and received significant promotion on social media, there is no concrete documentation or evidence to support the assertion that Mr. Michi paid the promoter for election advertising purposes or to secure an opportunity for a campaign speech.

It is important to approach these allegations with a fair and objective perspective, relying on verifiable evidence and facts rather than relying on unfounded claims or rumors. Without sufficient proof, it is irresponsible to draw conclusions or make assumptions regarding Mr. Michi's involvement in the Labour Day Weekend concert.

Sincerely,

Doug Briggs

Garry Michi Campaign Spokesperson

5:00 PM  
 01/09/23  
 Accrual Basis

## Garry Michi Election Campaign Contributions and Campaign Income All Transactions

Type	Date	Num	Memo	Qty	Amount	Balance
<b>Service</b>						
<b>Contribution</b>						
Invoice	07/08/2022	1	Garry Michi	1	1,000.00	1,000.00
Invoice	08/05/2022	2	Garry Michi	1	5,000.00	6,000.00
Invoice	09/20/2022	3	Jackie Miller	1	1,200.00	7,200.00
Invoice	09/20/2022	3	Dave Myles	1	300.00	7,500.00
Invoice	09/26/2022	4	Garry Michi	1	1,500.00	9,000.00
Invoice	09/26/2022	5	Tom Michi	1	1,200.00	10,200.00
Invoice	09/26/2022	6	Mario Roger	1	50.00	10,250.00
Invoice	09/26/2022	5	Chrissy Wilson	1	800.00	11,050.00
Invoice	09/30/2022	7	Wayne Thompson	1	1,000.00	12,050.00
Invoice	09/30/2022	7	Kim Thompson	1	1,000.00	13,050.00
Invoice	10/18/2022	8	Ron Gatis	1	100.00	13,150.00
Invoice	10/18/2022	9	Marg Miller	1	500.00	13,650.00
Total Contribution				12	13,650.00	13,650.00
Total Service				12	13,650.00	13,650.00
<b>TOTAL</b>				<b>12</b>	<b>13,650.00</b>	<b>13,650.00</b>

4:59 PM

01/09/23

Accrual Basis

## Garry Michi Election Campaign Campaign Finances Detail

All Transactions

Type	Date	Num	Name	Memo	Cir	Split	Amount	Balance
<b>Ordinary Income/Expense</b>								
<b>Income</b>								
<b>Contribution Income</b>								
Invoice	07/08/2022	1	Garry Michi	Garry Michi		Accounts Rec...	1,000.00	1,000.00
Invoice	08/05/2022	2	Garry Michi	Garry Michi		Accounts Rec...	5,000.00	6,000.00
Invoice	09/20/2022	3	Jackie Miller and Dave Myles	Jackie Miller		Accounts Rec...	1,200.00	7,200.00
Invoice	09/20/2022	3	Jackie Miller and Dave Myles	Dave Myles		Accounts Rec...	300.00	7,500.00
Invoice	09/26/2022	4	Garry Michi	Garry Michi		Accounts Rec...	1,500.00	9,000.00
Invoice	09/26/2022	5	Tom Michi and Chrissy Wilson	Tom Michi		Accounts Rec...	1,200.00	10,200.00
Invoice	09/26/2022	6	Mario Roger	Mario Roger		Accounts Rec...	50.00	10,250.00
Invoice	09/26/2022	5	Tom Michi and Chrissy Wilson	Chrissy Wilson		Accounts Rec...	800.00	11,050.00
Invoice	09/30/2022	7	Wayne and Kim Thompson	Wayne Thompson		Accounts Rec...	1,000.00	12,050.00
Invoice	09/30/2022	7	Wayne and Kim Thompson	Kim Thompson		Accounts Rec...	1,000.00	13,050.00
Invoice	10/18/2022	8	Ron Gatis	Ron Gatis		Accounts Rec...	100.00	13,150.00
Invoice	10/18/2022	9	Marg Miller	Marg Miller		Accounts Rec...	500.00	13,650.00
Cheque	12/30/2022	Draft	Garry Michi Payee	Account Closing		Kimberley J W...	-6.65	13,643.35
Total Contribution Income							13,643.35	13,643.35
<b>Total Income</b>							13,643.35	13,643.35
<b>Expense</b>								
<b>Advertising and Promotion</b>								
Bill	05/05/2022	67825434	BlueHost Web Page Hosting	Web Page		Accounts Pay...	287.88	287.88
Bill	08/19/2022	85919726	eKiosk Order	Colour Printing of Fly...		Accounts Pay...	256.63	544.51
Bill	08/30/2022	1239	TN Fenton Signs	Political Signs		Accounts Pay...	3,035.00	3,579.51
Bill	08/30/2022	559863	Wiarlon Home Hardware	Stakes Screws and W...		Accounts Pay...	191.43	3,770.94
Bill	09/06/2022	8402262151	Staples Canada	Envelopes		Accounts Pay...	1,379.38	5,150.32
Bill	09/12/2022	CC395471	Canada Post	Stamps		Accounts Pay...	820.37	5,970.69
Bill	09/13/2022		Town of South Bruce Peninsula	USB Stick for List of V...		Accounts Pay...	8.85	5,979.54
Bill	09/22/2022	8081113881	Staples Canada	Envelopes		Accounts Pay...	272.25	6,251.79
Bill	09/22/2022	1663669	Staples Canada	Sticky Notes		Accounts Pay...	2.19	6,253.98
Bill	09/22/2022	CC394017	Canada Post	Stamps		Accounts Pay...	92.00	6,345.98
Bill	09/22/2022	CC394017	Canada Post	Stamps Main Mail out		Accounts Pay...	2,042.40	8,388.38
Bill	09/22/2022	3642	Qwik Print Owen Sound	Flyers		Accounts Pay...	288.65	8,677.03
Bill	09/23/2022	CC105059	Canada Post	Stamps		Accounts Pay...	920.00	9,597.03
Bill	09/28/2022	3685	Qwik Print Owen Sound	Flyers		Accounts Pay...	787.70	10,384.73
Bill	10/07/2022		Colpoys Womens Institute	Hall Rental		Accounts Pay...	66.37	10,451.10
Cheque	10/12/2022	11	Kim West	Qwik Print Owen Sou...		Kimberley J W...	93.50	10,544.60
Bill	10/18/2022		Doug Briggs	Tim Hortons Gift Card		Accounts Pay...	442.48	10,987.08
Bill	10/19/2022		Wiarlon Legion	Hall Rental		Accounts Pay...	50.00	11,037.08
Bill	10/20/2022		Sauble Christian Fellowship	Hall Rental		Accounts Pay...	50.00	11,087.08
Bill	10/26/2022		Bites from the Bluffs	Charcutery Board for L...		Accounts Pay...	159.29	11,246.37
Cheque	10/28/2022	9	Jackie Miller and Dave Myles	Walmart		Kimberley J W...	47.87	11,294.24
Cheque	10/28/2022	9	Jackie Miller and Dave Myles	Walmart		Kimberley J W...	11.08	11,305.32
Cheque	10/28/2022	9	Jackie Miller and Dave Myles	WalMart		Kimberley J W...	40.47	11,345.79
Cheque	10/28/2022	9	Jackie Miller and Dave Myles	No Frills Food Store		Kimberley J W...	20.86	11,366.65
Cheque	10/28/2022	12	Woodford U, Jack Goobie Band	Band for Election Win...		Kimberley J W...	376.11	11,742.76
Cheque	10/28/2022	12	Kim West	Pizza for Setup		Kimberley J W...	39.48	11,782.24
Cheque	10/28/2022	13	Jackie Miller and Dave Myles	No Frills		Kimberley J W...	42.78	11,825.02
Cheque	10/28/2022	13	Jackie Miller and Dave Myles	LCBO		Kimberley J W...	238.10	12,063.12
Cheque	10/28/2022	13	Jackie Miller and Dave Myles	Beer Store		Kimberley J W...	54.95	12,118.07
Cheque	10/28/2022	13	Jackie Miller and Dave Myles	Foodland		Kimberley J W...	10.29	12,128.36
Cheque	10/28/2022	13	Jackie Miller and Dave Myles	Bennets		Kimberley J W...	10.15	12,138.51
Cheque	10/28/2022	13	Jackie Miller and Dave Myles	Foodland		Kimberley J W...	27.76	12,166.27
Cheque	10/29/2022	17	Jenny Bell	Cake and Cupcakes		Kimberley J W...	125.00	12,291.27
Total Advertising and Promotion							12,291.27	12,291.27
<b>Bank Service Charges</b>								
Bill	07/18/2022		TD Bank			Accounts Pay...	69.38	69.38
Bill	07/29/2022		TD Bank	Monthly Service Charge		Accounts Pay...	3.06	72.44
Bill	08/31/2022		TD Bank	Service Charge		Accounts Pay...	3.95	76.39
Bill	09/29/2022		TD Bank	Service Charge		Accounts Pay...	3.95	80.34
Bill	10/26/2022		Bites from the Bluffs	Charcutery Board for L...		Accounts Pay...	1.00	81.34
Cheque	10/31/2022		TD Bank	Service Charge		Kimberley J W...	3.95	85.29
Cheque	11/30/2022		TD Bank	Service Charge		Kimberley J W...	3.95	89.24
Total Bank Service Charges							89.24	89.24
<b>Office Supplies</b>								
Cheque	09/22/2022	2	Jenny Bell	Ink Cartridges		Kimberley J W...	69.56	69.56
Total Office Supplies							69.56	69.56
<b>Total Expense</b>							12,450.07	12,450.07
<b>Net Ordinary Income</b>							1,193.28	1,193.28
<b>Net Income</b>							1,193.28	1,193.28



# Business Account Statement

August 31, 2022 to September 29, 2022  
Account number:

Amount: \$500.00

SAUBLE RIVER FAMILY CAMP INC.  
C/O GARRY M. MICHI 1341 SAUBLE FALLS RD  
SAUBLE BEACH ONTARIO N0M2G0  
T: 619 477 2638

DATE 2022-08-27

PAY to the order of Rock Hard Stone Landscaping \$ 500.00  
Five hundred DOLLARS

ROYAL BANK OF CANADA  
SAUBLE BEACH BRANCH  
632 MAIN ST  
SAUBLE BEACH, ON N0M 2G0

SAUBLE RIVER FAMILY CAMP INC.  
BY Garry Michi

RE To sponsor Event

Endorsement - Signature or Stamp