



Election Compliance Audit Committee Agenda

Wednesday, July 3, 2024

Tom Davies Square

Peter McMullen, Chair

9:30 a.m. Council Chamber / Electronic Participation

City of Greater Sudbury Council and Committee Meetings are accessible and are broadcast publicly online and on television in real time and will also be saved for public viewing on the City's website at: <https://agendasonline.greatersudbury.ca>.

Please be advised that if you make a presentation, speak or appear at the meeting venue during a meeting, you, your comments and/or your presentation may be recorded and broadcast.

By submitting information, including print or electronic information, for presentation to City Council or Committee you are indicating that you have obtained the consent of persons whose personal information is included in the information to be disclosed to the public.

Your information is collected for the purpose of informed decision-making and transparency of City Council decision-making under various municipal statutes and by-laws and in accordance with the Municipal Act, 2001, Planning Act, Municipal Freedom of Information and Protection of Privacy Act and the City of Greater Sudbury's Procedure By-law.

For more information regarding accessibility, recording your personal information or live-streaming, please contact Clerk's Services by calling 3-1-1 or emailing clerks@greatersudbury.ca.

1. Call to Order
2. Roll Call
3. Declarations of Pecuniary Interest and the General Nature Thereof
4. Managers' Reports
 - 4.1 **Compliance Audit of Candidate's Campaign Finances – Auditor's Report** 3
This report provides information regarding the Auditor's Report prepared by KPMG in relation to the apparent contraventions of campaign finance rules by Ward 11 Candidate, Bill Leduc in the 2022 Municipal and School Board Election, and outlines the next steps in the Compliance Audit process.
5. Addendum
6. Adjournment

Compliance Audit of Candidate's Campaign Finances – Auditor's Report

Presented To: Election Compliance Committee

Meeting Date: July 3, 2024

Type: Managers' Reports

Prepared by: Danielle Derochie
Clerk's Services

Recommended by: General Manager of
Corporate Services

Report Summary

This report provides information regarding the Auditor's Report prepared by KPMG in relation to the apparent contraventions of campaign finance rules by Ward 11 Candidate, Bill Leduc in the 2022 Municipal and School Board Election, and outlines the next steps in the Compliance Audit process.

Relationship to the Strategic Plan, Health Impact Assessment and Climate Action Plans

This report refers to operational matters.

Financial Implications

All costs associated with legal proceedings against the candidate would be funded from the Election Expense Reserve Fund.

Background

The *Municipal Elections Act, 1996 (Act)* regulates municipal and school board elections in Ontario and outlines the deadlines, responsibilities, and penalties for all registered candidates and third parties with respect to campaign finances. Pursuant to section 88.29, all candidates are obligated to file a financial statement and auditor's report, as required, using the prescribed form.

Once received by the City Clerk's office, these statements are posted publicly to the election website. In order to complete a financial statement, candidates are required to provide details regarding their expenses and campaign contributions.

In accordance with section 88.33 of the Act, an eligible voter who believes on reasonable grounds that a candidate has contravened a provision of the Act relating to campaign finances may apply for a compliance audit of the candidate's election campaign finances.

On April 4, 2023, Anastasia Rioux submitted an Application for an Election Compliance Audit of Ward 11 candidate, Bill Leduc's campaign finances.

The Committee met on April 27, 2023, to consider the application and hear submissions from both the Candidate and the Applicant.

The Committee passed Resolution ECAC2023-4, granting the application by Ms. Rioux and appointing KPMG as the Auditor to conduct an audit of the candidate's election campaign finances.

As per the provisions of the Act, a report was prepared by the Auditor. The report has been appended and has been provided to the Applicant and Candidate.

Next Steps

On considering the Auditor's Report, the Committee must decide whether to commence legal proceedings against the Candidate for apparent contraventions of the campaign finance rules.

The Candidate and Applicant were given the opportunity to provide written submissions pertaining to the Auditor's Report for the Committee's consideration, prior to the meeting.

In accordance with the Committee's procedures, during the meeting, the Committee will first hear a brief presentation by the Auditor with a summary of the findings outlined in the Auditor's Report.

Following this, the Candidate, and the Applicant, in that order, will each be permitted to address the Committee for a period of up to ten (10) minutes. The parties will not be permitted to cross-examine or ask questions of the Auditor or one another.

At the conclusion of the submissions of the parties, the Committee will have the opportunity to deliberate whether or not to commence legal proceedings against the Candidate. On concluding its deliberations, the Committee will advise whether it has reached a decision and call a vote on the matter. The Committee may issue an oral decision, or it may reserve its decision.

Following the meeting, written reasons for the Committee's decision will be provided to the Candidate and the Applicant and made available on the City's website.

Resources Cited

[Municipal Elections Act, 1996, S.O. 1996, c. 32](#)



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

KPMG LLP

Report Date: May 24, 2024

This report contains 55 pages, 5 appendices, 2 schedules



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

Glossary

2018 Event	An event hosted at Westmount Retirement, 599 William Avenue, Greater Sudbury in 2018
2023 Event	An event hosted at Westmount Retirement, 599 William Avenue, Greater Sudbury in 2023
Applicant	Ms. Anastasia Rioux
Campaign Bank Account	Mr. Leduc's campaign bank account at Sudbury Credit Union, with account number ending #237
Election Campaign Period	The period of May 2 to December 31, 2022
Candidates' Guide	The 2022 Candidates' Guide – Ontario municipal council and school board elections
City	The City of Greater Sudbury
Clerk's Office	The Greater Sudbury Clerk's Office
Election Compliance Audit Committee	The Greater Sudbury Election Compliance Audit Committee
Form 4	The Financial Statement – Auditor's Report Candidate – Form 4
General Spending Limit	Mr. Leduc's "General" spending limit of \$14,159.60 as calculated by the Clerk's Office, for Mr. Leduc's 2022 election campaign, and as included on the Form 4
Grandparent's Day 2022	An event hosted at Westmount Retirement, 599 William Avenue, Greater Sudbury on September 11, 2022



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

Grandparent's Day 2022 Financial Summary	The financial summary of activities for Grandparent's Day 2022 prepared by Mr. Dean Eyre in his past role as Chair, Minnow Lake Community Action Network
Greater Sudbury	The City of Greater Sudbury
KPMG	KPMG LLP
MEA	Municipal Elections Act, 1996
Mr. Leduc's Campaign Finances	William (Bill) Leduc, Ward 11 Councillor's campaign finances, with respect to the 2022 Greater Sudbury municipal election
Notice of Decision	Notice of Decision by the Election Compliance Audit Committee in the matter of an Application for a Compliance Audit pursuant to subsection 88.33(1) of the MEA, and in the matter of a Meeting of the Election Compliance Audit Committee held April 27, 2023
Rioux Application	An application for a compliance audit of Mr. Leduc's Campaign Finances submitted April 4, 2023, by Anastasia Rioux pursuant to subsection 88.33(1) of the MEA
Table 2 of Form 4	Table 2: Inventory of campaign goods and materials from previous municipal campaign used in this campaign of the Form 4
Table 3 of Form 4	Table 3: Monetary contributions from individuals other than candidate or spouse of the Form 4
Volunteer Dinner	A dinner hosted by Mr. Leduc for volunteers who gave their time to support Grandparent's Day 2022. The dinner was hosted at the Greater Sudbury Hilton Garden Grille on the evening of September 11, 2022, following Grandparent's Day 2022



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

Contents

1	Introduction	5
1.1	Introduction	5
1.2	Mandate	5
1.3	Summary of findings	5
1.3.1	Cash contribution exceeding \$25	5
1.3.2	Payments for contributions apparently from a single payor	5
1.3.3	Campaign expenses apparently not paid from campaign bank account	6
1.3.4	Grandparent's Day 2022	6
1.4	Background	7
1.4.1	Election Campaign Period	7
1.4.2	Grandparent's Day 2022	7
1.4.3	Candidate's financial statement and auditor's report	8
1.4.4	Compliance audit of candidates' campaign finances	9
2	Restrictions	11
3	Scope of review and limitations	12
3.1	Scope of review	12
3.2	Limitations	12
4	Methodology	14
4.1	Review of Mr. Leduc's Financial Statement – Auditor's Report Candidate – Form 4	14
4.1.1	Form 4	14
4.1.2	Campaign Bank Account statements	15
4.2	Review of Grandparent's Day 2022	15
4.3	Interviews and discussions	16
5	KPMG Findings	18
5.1	Review of Mr. Leduc's Financial Statement – Auditor's Report Candidate – Form 4	18
5.1.1	Cash contribution exceeding \$25	18
5.1.2	Payments for contributions apparently from a single payor	21
5.1.3	Campaign expenses apparently not paid from campaign bank account	24
5.1.4	Accounting for campaign signage from 2018 election	28
5.1.5	Other findings	30



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

5.2	Grandparent's Day 2022	31
5.2.1	Summary of Issue	31
5.2.2	Similar events held in other years	33
5.2.3	Planning and promotion of the event	36
5.2.4	Campaign video filmed in part at Grandparent's Day 2022	37
5.2.5	Event description and activities	38
5.2.6	Sources of funding and event expenditures	40
5.2.7	Apparent contraventions of the MEA in relation to Grandparent's Day 2022	41
A	Appendix A: Scope of Review	49
A.1	Documents and information accessed on the Greater Sudbury website, at the link below:	49
A.2	Documents provided to KPMG by Mr. Leduc	50
A.3	Other	51
B	Appendix B: The Financial Statement – Auditor's Report Candidate – Form 4	52
C	Appendix C: KPMG interview notes for Mr. Leduc's interview on November 28, 2023, and Mr. Leduc's comments provided December 26, 2023	53
D	Appendix D: Detailed invoice for Nathalie's Online Deals	54
E	Appendix E: Financial Summary of Grandparent's Day 2022	55



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

1 Introduction

1.1 Introduction

KPMG LLP ("KPMG") was engaged by the City of Greater Sudbury (the "City" or "Greater Sudbury"), a City in Northeastern Ontario. We were retained to conduct a compliance audit of Mr. William ('Bill') Leduc, Ward 11 Councillor's campaign finances, with respect to the 2022 Greater Sudbury municipal election ("Mr. Leduc's Campaign Finances"), pursuant to section 88.33 of the Municipal Elections Act, 1996 (the "MEA").

1.2 Mandate

Our duty as auditor¹ is outlined in subsection 88.33(12) of the MEA, *Duty of auditor*:

"The auditor shall promptly conduct an audit of the candidate's election campaign finances to determine whether he or she has complied with the provisions of this Act relating to election campaign finances and shall prepare a report outlining any apparent contravention by the candidate. 2016, c. 15, s. 63."

1.3 Summary of findings

Based on the scope of review and subject to the restrictions, limitations and assumptions noted herein, we summarize below what appear to be contraventions of the MEA, with respect to Mr. Leduc's Campaign Finances.

1.3.1 Cash contribution exceeding \$25

It appears that during the Election Campaign Period, Mr. Leduc accepted a \$1,000 contribution from Mr. Norm Bouffard. The contribution was comprised of a \$500 cheque and \$500 in cash. It appears that the contribution from Mr. Bouffard was \$475 in excess of the cash contribution limit, pursuant to subsection 88.8(8) of the MEA.

We discuss this finding in greater detail in section 5.1.1.

1.3.2 Payments for contributions apparently from a single payor

It appears that during the Election Campaign Period, Mr. Leduc accepted \$3,000 of contributions comprised of bank drafts purchased by Ms. Anna Maria Villano. The

¹ This is an audit pursuant to the MEA and does not constitute an audit in accordance with Canadian generally accepted auditing standards.



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances
Report Date: May 24, 2024

contributions consisted of three (3) \$1,000 bank drafts, with the memo lines of one (1) of those drafts including the names of Anna Villano, Mike Villano and Frank Villano, respectively. The contributions were similarly listed on Mr. Leduc's 'Financial Statement – Auditor's Report Candidate – Form 4', as submitted to the City of Greater Sudbury's Clerk's Office.

It appears that the contributions did not associate the contributor's name and account with the payment, pursuant to subsection 88.8(8) of the MEA. Therefore, it appears that the bank drafts purchased by Ms. Anna Maria Villano may be \$1,800 in excess of contributions allowed from a single contributor, pursuant to subsection 88.9(1) of the MEA.

We discuss this finding in greater detail in section 5.1.2.

1.3.3 Campaign expenses apparently not paid from campaign bank account

It appears that during the Election Campaign Period, Mr. Leduc incurred approximately \$307 of campaign expenses which were recorded by Mr. Leduc but were not paid from Mr. Leduc's campaign bank account. Pursuant to subsection 88.22(1) of the MEA, all payments for expenses should have been paid from the campaign accounts.

We discuss this finding in greater detail in section 5.1.3.

1.3.4 Grandparent's Day 2022

The April 27, 2023, written decision by the Election Compliance Audit Committee stated that the evidence reviewed demonstrated that Mr. Leduc's election campaign was to some extent promoted at a September 11, 2022, event hosted by Mr. Leduc.

The event which was advertised as 'Grandparent's Day' took place at the Westmount Retirement Residence in Greater Sudbury. The event was open to community members and included free food and beverages, live music, prizes, horse and buggy rides, an antique car show, a police car, ambulance and fire truck.

Pursuant to subsection 88.19(1) of the MEA, expenses incurred, "*partly for use in an election campaign,*" are expenses and we understand should therefore be recorded in full. As a result, and pursuant to subsections 88.19(1) and 88.19(3) of the MEA, all expenses of Grandparent's Day 2022 may be determined to be expenses in relation to Mr. Leduc's election campaign.

Further, Mr. Leduc's general spending limit for the election campaign was \$14,159.60, while he reported expenses (prior to any adjustments by KPMG) subject to this limit of \$14,017.10. KPMG identified five (5) apparent adjustments totaling approximately \$3,080 to Mr. Leduc's election campaign expenses, in relation to the September 11, 2022 event



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances
Report Date: May 24, 2024

which were not included in the \$14,017.10 of reported expenses. As a result, Mr. Leduc appears to have exceeded the general spending limit by up to approximately \$2,938.

Prior to any adjustments, Mr. Leduc reported contributions from himself and/or his spouse totaling approximately \$3,508. KPMG identified an apparent adjustment of \$750 related to prizes purchased by Mr. Leduc for the September 11, 2022, event. However, this adjustment does not cause Mr. Leduc to exceed the maximum contribution allowed of approximately \$7,155.

We discuss these findings in greater detail in section 5.2.

1.4 Background

We understand the following:

1.4.1 Election Campaign Period

- Mr. Leduc campaigned as a candidate for Councillor, Ward 11, in Greater Sudbury's 2022 Municipal Election;
- On May 2, 2022, Mr. Leduc submitted his nomination for the office of Councillor, Ward 11, to the Greater Sudbury Clerk's office (the "Clerk's Office");
- The election took place on October 24, 2022, and Mr. Leduc was elected Councillor, Ward 11; and
- Pursuant to subsection 88.24(1) of the MEA, "*the election campaign period begins on the day on which the clerk receives his or her nomination for the office under section 33,*" and "*the election campaign ends on December 31 in the case of a regular election.*" Therefore, Mr. Leduc's Election Campaign Period, being the period subject to this compliance audit, is May 2, 2022, to December 31, 2022.

1.4.2 Grandparent's Day 2022

- On September 11, 2022, an event was hosted at the Westmount Retirement Residence, located at 599 William Avenue in Greater Sudbury, from approximately 12:00 – 3:00 p.m. The event was advertised as '*Grandparents Day*' ("Grandparent's Day 2022");
- A flyer for Grandparent's Day 2022, which was circulated in Greater Sudbury, described the event as, "*a special time for grandparents, grandchildren and the community to come together.*" The flyer indicated that the event would include free



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

pizza & chicken wings, games, horse & buggy rides, a classic car show, a fire truck, ambulance and police car on display, live entertainment and more; and

— Mr. Leduc attended Grandparent's Day 2022.

1.4.3 Candidate's financial statement and auditor's report

— Pursuant to subsection 88.25(1) of the MEA, "on or before 2 p.m. on the filing date, a candidate shall file with the clerk with whom the nomination was filed a financial statement and auditor's report, each in the prescribed form, reflecting the candidate's election campaign finances,

(a) in the case of a regular election, as of December 31 in the year of the election ..."


— In accordance with the 2022 Candidates' Guide – Ontario Municipal Council and School Board Elections (the "Candidates' Guide"), "all candidates must file a financial statement. This includes candidates who withdrew their nomination, candidates who were not certified and did not appear on the ballot, and candidates who were acclaimed. Candidates must use Form 4."

— On March 23, 2023, Mr. Leduc submitted his financial statement and auditor's report for his Election Campaign Period to the Clerk's office. The financial statement and auditor's report were included on the Financial Statement – Auditor's Report Candidate – Form 4 (the "Form 4") from the Ministry of Municipal Affairs. Mr. Leduc's Form 4 noted that the submission was for the campaign period from May 2 to December 31, 2022, and was signed and dated March 23, 2023. The Form 4 has been attached to the report as **Appendix B**.

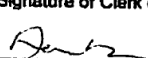
— Below is an excerpt of *Box B: Declaration*, as included on the Form 4. Mr. Leduc signed and dated Box B on March 23, 2023, certifying that the information included in the Form 4 with respect to Mr. Leduc's Campaign Finances was, "true and correct".

Box B: Declaration

I, William Leduc, 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

MAR 23 / 23
Date (yyyy/mm/dd)

Date Filed (yyyy/mm/dd)	Time Filed	Initial of Candidate or Agent (if filed in person)	Signature of Clerk or Designate
2023/03/23	11:04am		



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

1.4.4 Compliance audit of candidates' campaign finances

- On April 4, 2023, Anastasia Rioux submitted an application for a compliance audit of Mr. Leduc's Campaign Finances ("the Rioux Application"), pursuant to subsection 88.33(1) of the MEA.
- The Rioux Application included allegations against Mr. Leduc, regarding certain apparent violations of the MEA, in relation to Grandparent's Day 2022.
- Following a review by the Greater Sudbury Election Compliance Audit Committee (the "Election Compliance Audit Committee") on April 27, 2023, the Rioux Application was granted. The written decision included, but was not limited to, the following reasons for the decision:
 - The Election Compliance Audit Committee found there was reason to believe Mr. Leduc had contravened the campaign finance rules in respect of certain donations he made to Grandparent's Day 2022;
 - Photographic and video evidence submitted by the Applicant, together with Mr. Leduc's own admissions, demonstrated that Mr. Leduc's election campaign was promoted at Grandparent's Day 2022;
 - The Election Compliance Audit Committee was of the opinion that the cost of prizes donated to Grandparent's Day 2022 by Mr. Leduc constituted a campaign expense since they were used, in part, for Mr. Leduc's election campaign and the promotion of Mr. Leduc's candidacy; and
 - Therefore, the Election Compliance Audit Committee was of the opinion that there were reasonable grounds to believe that Mr. Leduc failed to record all campaign expenses and campaign contributions in his candidates' financial statement, and that Mr. Leduc paid for campaign expenses from personal funds.
- On April 21, 2023, Christopher Duncanson-Hales submitted a second, separate application for a compliance audit of Mr. Leduc's Campaign Finances, pursuant to subsection 88.33(1) of the MEA.
- Following the Election Compliance Audit Committee's review of Mr. Duncanson-Hales' application on May 25, 2023, the application was rejected. The written decision included, but was not limited to, the following reasoning:
 - The Election Compliance Audit Committee had already considered substantially the same allegations about Mr. Leduc and Grandparent's Day 2022, in the Rioux Application at the Election Compliance Audit Committee's April 27, 2023, meeting; and



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

- Since a compliance audit of Mr. Leduc's Campaign Finances had already been ordered, there was no further or additional relief that the Election Compliance Audit Committee could grant in respect of Mr. Duncanson-Hales' application.



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

2 Restrictions

We understand that our report is intended to assist the Election Compliance Audit Committee in examining, understanding and resolving this matter. We understand that our report may be referred to in the context of determining whether Mr. Leduc appears to have contravened a provision of the MEA relating to campaign finances. We understand that in this case, our reports will be provided to the Election Compliance Audit Committee, the Greater Sudbury Clerk, Mr. William Leduc and his representatives, and Ms. Anastasia Rioux. Our report may be provided to Ms. Rioux and Mr. Leduc as well as his representatives on a non-reliance basis and for informational purposes only, and we consent to such uses of our report. We further understand that documents and materials filed with or prepared by the Clerk or any other election official under the MEA are public records. As a result, we understand that documents and materials filed with the Clerk or any other election official under the MEA, until their destruction, may be inspected by any person at the Clerk's office at a time when the office is open. However, our reports are not intended for general use, circulation or publication for any purpose outside of this matter. For the avoidance of doubt, other than as specifically noted in this section, our report may not be disclosed, copied, quoted or referred to in whole or in part, whether for the purposes of litigation, disciplinary proceedings or otherwise, without our prior written consent in each specific instance.

We will not assume any responsibility or liability for any costs, damages, losses, liabilities or expenses suffered by Greater Sudbury, Ms. Rioux or Mr. Leduc as a result of circulation, publication, reproduction, use of or reliance upon our report contrary to the provisions of this section. We will not assume any responsibility or liability for any costs, damages, losses, liabilities, or expenses incurred by anyone else as a result of circulation, publication, reproduction, use of or reliance upon our report. Comments in our report are not intended, nor should they be interpreted to be, legal advice or opinion.

We have relied upon the completeness, accuracy and fair presentation of all the information obtained (the "Information"). Our comments are conditional upon the completeness, accuracy and fair presentation of such Information. Subject to the exercise of professional judgment, KPMG has not audited or otherwise independently verified the accuracy or fair presentation of any of the Information. Should additional information be provided to us after the date of this report, we reserve the right, but will be under no obligation, to review this information and adjust our report accordingly.



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

3 Scope of review and limitations

3.1 Scope of review

Our comments, calculations and analysis as contained in this report are based on our review of the information listed in Appendix A – Scope of review.

We also held discussions with the following individuals:

- Mr. Leduc
- Mr. Richard Charette, Chair, Minnow Lake Community Action Network, ("Minnow Lake CAN")
- Mr. Dean Eyre, former Chair, Minnow Lake CAN
- Mr. Connor LaRocque, Chief Executive Officer, SocialRise Inc.

3.2 Limitations

Our report is limited for the following reasons:

- The Rioux Application included allegations against Mr. Leduc with respect to an apparent lack of completeness of campaign contributions and expenses included in the Form 4. KPMG included information contained in the Form 4, together with the allegations included in the Rioux Application in the scope of our review. However, due to the nature of electoral campaigns, whereby in certain circumstances a candidate must apply judgement to the determination of what constitutes a campaign contribution or expense and/or the onus is on the candidate to record all contributions and expenses, KPMG is unable to practicably conclude on the completeness of other contributions and expenses in relation to Mr. Leduc's Campaign Finances. Other omissions with respect to Mr. Leduc's Campaign Finances, if any, may not have been identified by our review.
- On the Form 4, *Table 2: Inventory of campaign goods and materials from previous municipal campaign used in this campaign* ("Table 2 of Form 4"), Mr. Leduc listed \$3,507.60. We understand that this amount related to signs from Mr. Leduc's 2018 municipal election campaign, which were reused by Mr. Leduc for his 2022 election campaign. Mr. Leduc told us that the signs from his 2018 election campaign had been stored outside, and as a result some of the signs became unusable due to fading and other damage caused by exposure to the elements. Mr. Leduc told us that as a result, the reported expense was limited to the replacement value of the usable signs. KPMG is unable to verify the number of signs from the previous campaign which were used by



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

Mr. Leduc and therefore needed to rely on information provided by Mr. Leduc, regarding the same.

- KPMG attempted to contact Nathalie Grenier, Owner of Nathalie's Online Deals, by telephone and email in order to discuss purchases apparently made by Mr. Leduc for Grandparent's Day 2022, but was not successful in reaching Ms. Grenier. KPMG is unsure if Ms. Grenier might have information relevant to this review.
- KPMG did not make audio or video recordings of our discussions or interviews. During the interview with Mr. Leduc, the KPMG interviewers took detailed notes. Following the interview, the KPMG interviewers consolidated their interview notes and provided them to Mr. Leduc, to provide him with an opportunity to review the notes for completeness and accuracy. KPMG asked Mr. Leduc to provide his edits, if any, together with the interview notes signed and dated to attest to Mr. Leduc's agreement that the reviewed interview notes were a complete and accurate representation of the interview. On December 26, 2023, Mr. Leduc returned the interview notes together with his comments and edits on the same by email. Mr. Leduc stated in that email, *"at this time, the document will remain unsigned as this is to the best of my recollection of the details that you require from 2022. After a series of questions, spanning the course of almost 6 years, I am answering with my upmost [sic] integrity."*



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

4 Methodology

In providing our comments and analysis, in addition to the activities and methods noted elsewhere in this report, we performed the procedures discussed below:

4.1 Review of Mr. Leduc's Financial Statement – Auditor's Report Candidate – Form 4

4.1.1 Form 4

KPMG performed the following procedures:

- Reviewed applicable sections of the MEA and the Candidates' Guide;
- Obtained a copy of the Form 4 and related supporting documents from Mr. Leduc. Copies of documents provided by Mr. Leduc were hand delivered to our KPMG office located at 1760 Regent Street in Greater Sudbury or provided to KPMG electronically;
- For contributions included on the Form 4, reviewed *Schedule 1 - Contributions* and reconciled/vouched contributions to supporting documentation, including but not limited to copies of cheques, deposit slips, donation receipts, invoices and bank drafts;
- For Table 2 of the Form 4, reviewed copies of invoices pertaining to signs purchased for Mr. Leduc's 2018 election campaign, inquired with Mr. Leduc as to how the amounts recorded on Table 2 of Form 4 were determined and performed recalculations of the same;
- For expenses included on the Form 4, reviewed General Ledger detail on the 'Transactions by Account' reports for the Election Campaign Period. KPMG also reviewed supporting documentation for each expenditure, including but not limited to copies of invoices, cheques and receipts and reconciled expenses to the supporting documents;
- Obtained copies of bank statements and cheque copies for Mr. Leduc's campaign bank account at Sudbury Credit Union, with account number ending #237 (the "Campaign Bank Account") for the period of July 26, 2022, to March 31, 2023². KPMG reconciled items included on the bank statements to the Form 4, to check for completeness of the items included on the Form 4;

² While the Campaign Period is the period of May 2 to December 31, 2022, the bank account was not opened until July 26, 2022, and therefore the bank statements obtained by KPMG for the period of July 26, 2022, to March 31, 2023, are for the full period the account was open.



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

- Reconciled items included in the Form 4 to the Campaign Bank Account, to check for accuracy and existence of the items included on the Form 4; and
- Interviewed Mr. Leduc and performed inquiries regarding certain specific transactions recorded in the Form 4.

4.1.2 Campaign Bank Account statements

KPMG performed the following procedures:

- Reviewed applicable sections of the MEA and the Candidates' Guide;
- Obtained and reviewed monthly bank statements of the Campaign Bank Account;
- Obtained and reviewed supporting documentation for all transactions during the Election Campaign Period including, but not limited to, copies of cheques, invoices, deposit slips and General Ledger details; and
- Reconciled the Campaign Bank Account transactions to the amounts recorded on Form 4, to check for completeness of information included on the Form 4.

4.2 Review of Grandparent's Day 2022

KPMG performed the following procedures:

- Reviewed applicable sections of the MEA and the Candidates' Guide;
- Obtained and reviewed the following documents:
 - City of Greater Sudbury Election Compliance Audit Committee Agenda dated April 27, 2023;
 - Applicant's Presentation for Election Compliance Audit Committee;
 - Applicant's Submission – Mr. Leduc's Campaign Video;
 - Candidate's Submission signed by Mr. Leduc; and
 - Notice of Decision by the City of Greater Sudbury Election Compliance Audit Committee in the matter of an Application for a Compliance Audit pursuant to subsection 88.33(1) of the MEA, and in the matter of the Election Compliance Audit Committee held April 27, 2023 (the "Notice of Decision").



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances
Report Date: May 24, 2024

- Interviewed the following individuals, regarding certain information and activities in relation to Grandparent's Day 2022:
 - Mr. Richard Charette, Chair of Minnow Lake CAN
 - Mr. Dean Eyre, former Chair of Minnow Lake CAN
- Interviewed Mr. Leduc regarding certain aspects of Grandparent's Day 2022, including but not limited to:
 - Mr. Leduc's involvement in planning and running the event
 - Event budgeting and financing
 - Event volunteers
 - Event activities
- Contacted Mr. Connor LaRocque, owner of SocialRise Inc., by telephone to inquire about SocialRise Inc.'s involvement with Grandparent's Day 2022, if any; and
- Reconciled information on the Campaign Bank Account statements and the Form 4 to supporting documents and information obtained regarding Grandparent's Day 2022.

4.3 Interviews and discussions

Throughout our review, KPMG conducted interviews and discussions, as outlined in the table below:

Interviewee	Date	Time
Richard Charette	November 24, 2023	3:00 p.m.
Bill Leduc	November 28, 2023	11:30 a.m.
Connor LaRocque	December 1, 2023	11:47 a.m.
Dean Eyre	January 29, 2024	4:00 p.m.

We note the following:

- Interviews were hosted by KPMG virtually, via Microsoft Teams;
- Our discussion with Mr. LaRocque was conducted by telephone;
- KPMG did not record our interviews or discussions, though KPMG took detailed notes. Following the interviews and discussions, the notes were provided to Mr. Leduc, Mr.



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

Charette and Mr. Eyre to provide them with an opportunity to review the notes for accuracy and completeness. KPMG also provided an opportunity to edit, redact and elaborate on the notes, if required. KPMG asked each interviewee to sign and date a copy of the notes, following their review, attesting that the final version of the notes was a complete and accurate summary of their discussion with KPMG;

- The interview notes from our discussion with Mr. Leduc, along with his comments provided on December 26, 2023, have been attached as **Appendix C**;
- Our discussion with Mr. LaRocque was a brief telephone call to inquire about limited information and not a formal interview. Therefore, though KPMG took notes of the discussion, these were not provided to Mr. LaRocque for signature; and
- KPMG spoke with Mr. Leduc over the telephone on several occasions, in order to discuss KPMG's information requests and documents and support provided to KPMG by Mr. Leduc, regarding the same.



5 KPMG Findings

As outlined in section 1.2 and pursuant to section 88.33(12) of the MEA, KPMG's duty as auditor is to determine if Mr. Leduc has complied with the provisions of the MEA with respect to his 2022 election campaign finances and to report on the same. In this section we have outlined apparent contraventions of the MEA by Mr. Leduc as identified during our review. With respect to apparent contraventions regarding the completeness and accuracy of the Form 4, we have quantified the related impacts.

5.1 Review of Mr. Leduc's Financial Statement – Auditor's Report Candidate – Form 4

5.1.1 Cash contribution exceeding \$25

5.1.1.1 Summary of apparent contravention of the MEA

Pursuant to subsection 88.8(8) of the MEA, "A contribution of money that exceeds \$25 shall not be contributed in the form of cash and shall be contributed in a manner that associates the contributor's name and account with the payment or by a money order signed by the contributor."

Table 3: Monetary contributions from individuals other than candidate or spouse of the Form 4 ("Table 3 of Form 4") lists monetary campaign contributions to Mr. Leduc's campaign which exceeded \$100 per contributor, from contributors other than Mr. Leduc or his spouse. When reconciling Table 3 of Form 4 to supporting documents provided by Mr. Leduc, KPMG noted a contribution which appears to constitute a contravention of subsection 88.8(8) of the MEA. The contribution is included below, as presented on Table 3 of Form 4:

Name	Full Address	Date Received (yyyy/mm/dd)	Amount Received (\$)	Amount Returned to Contributor or Paid to Clerk (\$)
Norm Bouffard	1301 Drummond Ave Sudbury ON P3A 4Y9	2022/07/27	1,000.00	-

KPMG noted that the supporting documents provided by Mr. Leduc in relation to this contribution are comprised of a copy of a cheque written to Mr. Leduc, dated July 27, 2022, in the amount of \$500, from the bank account of *A. Madore et N. Bouffard*, together with photocopies of five (5) \$100 bills.

Attached as **Exhibit 1** are images of the cheque copy and \$100 bills provided by Mr. Leduc:

The City of Greater Sudbury
Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances
Report Date: May 24, 2024

0265

Caisse Populaire Lesalle Lake
1380, boulevard La Salle
Sudbury (Ontario) P3A 1Z6
(705) 516-3644

DATE 27 07 2022
D D M M Y Y Y Y

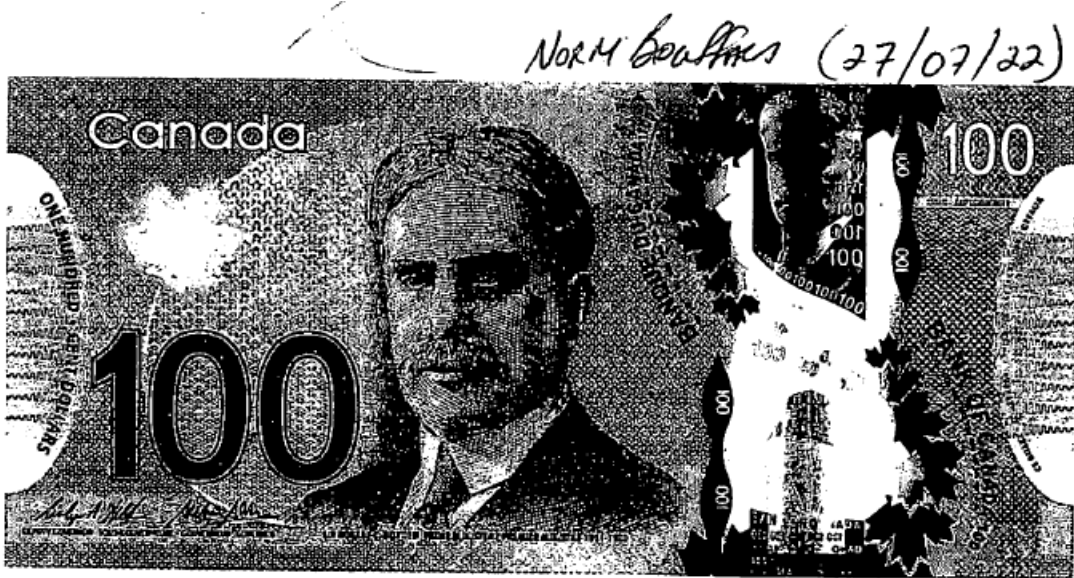
A. Madore et N. Bouffard

PAY TO THE ORDER OF Bill Leduc \$ 500
Five Hundred Dollars ~~100~~ DOLLARS

A. Madore et N. Bouffard

FOR _____ PER _____

[Redacted]



The City of Greater Sudbury
Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances
Report Date: May 24, 2024



The total of cash apparently provided to Mr. Leduc by Mr. Bouffard is \$500. Therefore, it appears that the contribution accepted from Mr. Bouffard was \$475 in excess of the cash contribution limit, pursuant to subsection 88.8(8) of the MEA.



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

5.1.1.2 *Response by Mr. Leduc*

During our interview on November 28, 2023, Mr. Leduc told us the following:

- Mr. Bouffard made a contribution of \$1,000;
- Mr. Bouffard wrote a cheque to Mr. Leduc for \$500, but also provided \$500 in cash; and
- Mr. Leduc's intention in photocopying the five (5) \$100 bills was to demonstrate where the contribution had come from.

5.1.2 **Payments for contributions apparently from a single payor**

5.1.2.1 *Summary of apparent contravention of the MEA*

Pursuant to subsection 88.8(8) of the MEA, *"A contribution of money that exceeds \$25 shall not be contributed in the form of cash and shall be contributed in a manner that associates the contributor's name and account with the payment or by a money order signed by the contributor."*

Further, pursuant to subsection 88.9(1) of the MEA, *"A contributor shall not make contributions exceeding a total of \$1,200 to any one candidate in an election."*

Further, pursuant to subsection 88.22(1) of the MEA, *Duties of Candidates*, *"A candidate shall ensure that, ... (r) each contributor is informed that a contributor shall not make contributions exceeding, (i) subject to subsection (2), a total of \$1,200 to any one candidate in an election," and "(o) a contribution of money made or received in contravention of this or a by-law passed under this Act is returned to the contributor as soon as possible after the candidate becomes aware of the contravention."*

Table 3 of Form 4 lists monetary campaign contributions to Mr. Leduc's campaign which exceeded \$100 per contributor, from contributors other than Mr. Leduc or his spouse. When reconciling Table 3 of Form 4 to supporting documents provided by Mr. Leduc, KPMG noted three (3) contributions which together appear to constitute contraventions of subsections 88.8(8) and 88.9(1) of the MEA. Those three (3) contributions are included below, as presented on Table 3 of Form 4:



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances
 Report Date: May 24, 2024

Name	Full Address	Date Received (yyyy/mm/dd)	Amount Received (\$)	Amount Returned to Contributor or Paid to Clerk (\$)
Anna Villano	201 Hollybrook Cres Azilda ON P0M 1B0	2022/08/09	1,000.00	-
Mike Vallano	269 David St Sudbury ON P3E 1T7	2022/08/09	1,000.00	-
Frank Villano	F421-1290 Bancroft Dr Sudbury ON P3B 4G9	2022/08/09	1,000.00	-
Total			3,000.00	-

KPMG noted that supporting documents provided by Mr. Leduc in relation to these contributions are comprised of three (3) copies of Toronto-Dominion Bank drafts with successive serial numbers beginning 1543163, dated August 9, 2022, apparently purchased by Anna Maria Villano.

Attached as **Exhibit 2** is a copy of a bank draft with serial no. 1543163, dated August 9, 2022, in the amount of \$1,000, purchased by Ms. Villano, with Mr. Leduc as payee. The name '*Mike Villano*' is handwritten on the memo line of the bank draft.

10358 (0521) THIS DOCUMENT IS PRINTED ON WATERMARKED PAPER. SEE BANK FOR INST. INQUIRIES.

The Toronto-Dominion Bank 1543163
 43 ELM STREET SUDBURY, ON P3E 4R7
 Purchaser MS ANNA MARIA VILLANO DATE 2022-08-09
YYYYMMDD
 Transit-Serial No. [REDACTED]-01543163
 Pay to the Order of BILL LEDUC \$ *****1,000.00
 ONE THOUSAND**00/100 Canadian Dollars
 Authorized signature required for amounts over CAD \$5,000.00
 Re MIKE VILLANO Authorized Officer [Signature] Number W 3006
 The Toronto-Dominion Bank
 Toronto, Ontario
 Canada M5K 1A2 Countersigned _____
 OUTSIDE CANADA REGULATE BY COMPLETING ALL INFORMATION HERE FOR CASH AND DRAFTS ONLY CANADA

⑈01543163⑈ [REDACTED]

Attached as **Exhibit 3** is a copy of a bank draft with serial no. 1543164, dated August 9, 2022, in the amount of \$1,000, purchased by Ms. Villano, with Mr. Leduc as payee. The name '*Anna Villano*' is handwritten on the memo line of the bank draft.



The City of Greater Sudbury
 Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances
 Report Date: May 24, 2024

10358 (0521) THIS DOCUMENT IS PRINTED ON WATERMARKED PAPER. SEE BACK FOR INSTRUCTIONS

The Toronto-Dominion Bank 1543164
 43 ELM STREET SUDBURY, ON P3E 4R7
 Purchaser MS ANNA MARIA VILLANO DATE 2022-08-09
 YYYMMDD
 Transit-Serial No. [REDACTED]-01543164
 Pay to the Order of BILL LEDUC \$ *****1,000.00
 ONE THOUSAND**00/100 Canadian Dollars
 Authorized signature required for amounts over CAD \$5,000.00
 Re ANNA VILLANO Authorized Officer [Signature] Number W 2016
 The Toronto-Dominion Bank
 Toronto, Ontario
 Canada M5K 1A2
 Countersigned

OUTSIDE CANADA NEGOTIABLE BY CORRESPONDENTS AT THEIR BUYING RATE FOR DEMAND DRAFTS ON CANADA

⑈01543164⑈ [REDACTED]

Attached as **Exhibit 4** is a copy of a bank draft with serial no. 1543165, dated August 9, 2022, in the amount of \$1,000, apparently purchased by Ms. Villano, with Mr. Leduc as payee. The name 'Frank Villano' is handwritten on the memo line of the bank draft.

10358 (0521) THIS DOCUMENT IS PRINTED ON WATERMARKED PAPER. SEE BACK FOR INSTRUCTIONS

The Toronto-Dominion Bank 1543165
 43 ELM STREET SUDBURY, ON P3E 4R7
 Purchaser MS ANNA MARIA VILLANO DATE 2022-08-09
 YYYMMDD
 Transit-Serial No. [REDACTED]-01543165
 Pay to the Order of BILL LEDUC \$ *****1,000.00
 ONE THOUSAND**00/100 Canadian Dollars
 Authorized signature required for amounts over CAD \$5,000.00
 Re FRANK VILLANO Authorized Officer [Signature] Number W 2016
 The Toronto-Dominion Bank
 Toronto, Ontario
 Canada M5K 1A2
 Countersigned

OUTSIDE CANADA NEGOTIABLE BY CORRESPONDENTS AT THEIR BUYING RATE FOR DEMAND DRAFTS ON CANADA

⑈01543165⑈ [REDACTED]

The purchaser of all three (3) bank drafts appears to be the same. Therefore, it appears that the contributions listed on Table 3 of Form 4, listed as contributed by Mike Villano [sic] and Frank Villano, were paid by bank drafts not purchased by the contributor, as required pursuant to subsection 88.8(8) of the MEA.

KPMG did not speak with Ms. Villano, Mr. Mike Villano or Mr. Frank Villano (together, the "Villanos") with respect to these contributions. However, if the contributions listed on Table



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances
Report Date: May 24, 2024

3 of Form 4 as contributed by Mike Villano and Frank Villano are determined to be contributions by Ms. Villano, the amount of Ms. Villano's contribution would be \$1,800 in excess of the contribution limit to any one candidate in an election, pursuant to subsection 88.9(1) of the MEA.

We understand from our interview with Mr. Leduc that he does not recall informing any of the Villanos that a contributor shall not make contributions exceeding \$1,200 to any one candidate in an election, pursuant to subsection 88.22(1) of the MEA. We further understand that as at the date of our interview, no portion of the contributions were returned to Ms. Villano pursuant to subsection 88.22(1) of the MEA.

5.1.2.2 Response by Mr. Leduc

During our interview on November 28, 2023, Mr. Leduc told us the following:

- The Villanos all reside at separate addresses;
- Mr. Leduc understood that the bank drafts were for three separate contributions: \$1,000 from Ms. Villano, \$1,000 from Mr. Mike Villano and \$1,000 from Mr. Frank Villano;
- Mr. Leduc did not notice that all of the bank drafts appeared to be issued in the name of Ms. Villano and therefore did not inquire further; and
- Mr. Leduc does not recall informing any of the Villanos that a contributor shall not make contributions exceeding \$1,200 to any one candidate in an election.

5.1.3 Campaign expenses apparently not paid from campaign bank account

5.1.3.1 Summary of apparent contravention of the MEA

Pursuant to subsection 88.22(1), paragraph (d) of the MEA, *"A candidate shall ensure that all payments for expenses are made from the campaign accounts."*

The Form 4 lists campaign expenses subject to the general spending limit totaling \$14,017.10. Mr. Leduc's general spending limit of \$14,159.60 ("the General Spending Limit") was calculated by the Clerk's Office in accordance with subsection 88.20(6) of the MEA and was included on the Form 4.

When reconciling campaign expenses subject to the general spending limit to supporting documentation provided by Mr. Leduc, KPMG noted fifteen (15) expenditures which were paid using cash or debit card, but which were not paid from the Campaign Bank Account or reimbursed to Mr. Leduc. The total of the expenditures was \$307.14. The expenditures



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances
 Report Date: May 24, 2024

are listed in the table below, as presented in the General Ledger account detail provided to KPMG by Mr. Leduc:

Campaign Expenses Recorded but not Paid out of Campaign Bank Account						
KPMG No.	Expense Category	Vendor	Date	Payment Type	Amount (incl. HST)	
64	Advertising	Staples	8/7/2022	Debit	\$	37.73
75	Signs	Home Depot	7/28/2022	Debit		30.11
75	Signs	Home Hardware	8/4/2022	Cash		4.83
76	Signs	Home Hardware	8/19/2022	Debit		106.58
76	Signs	Dollarama	8/23/2022	Cash		4.80
76	Signs	Home Hardware	8/23/2022	Cash		2.42
77	Signs	Home Depot	8/28/2022	Debit		19.53
77	Signs	Home Depot	9/4/2022	Cash		9.99
81	Signs	Dollarama	9/4/2022	Cash		4.80
81	Signs	Dollarama	9/17/2022	Cash		4.80
88	Office expenses	Home Hardware	7/28/2022	Debit		37.26
88	Office expenses	Dollartree	8/7/2022	Debit		18.65
89	Office expenses	Staples	9/2/2022	Cash		5.30
90	Office expenses	Dollarama	9/11/2022	Debit		10.17
90	Office expenses	Dollartree	9/14/2022	Debit		10.17
Total					\$	307.14
<i>Source: General Ledgers provided for Campaign Expense Accounts, Transaction Receipts</i>						

For example, attached as **Exhibit 5** is a copy of a Home Hardware receipt dated August 19, 2022, in the amount of \$106.58, provided to us by Mr. Leduc. The amount was reconciled to the subtotal for 'Signs (including sign deposit)' of \$655.51, included under '1. Expenses subject to general spending limit' on Form 4. The receipt indicates that the payment was made by debit card. However, KPMG was unable to reconcile this transaction to the statements for the Campaign Bank Account.



The City of Greater Sudbury
 Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances
 Report Date: May 24, 2024

Signs



=====

HOME HARDWARE
 SECOND AVENUE HOME HARDWARE
 SUDBURY, ON, P3B 3Y4, 705-566-5602
 Phone: (705)566-5602 HST# R105967871

=====

2130946 NAILS, SPIRAL HOT GLV 12" 50LB	
H 15. LB @ \$4.85/LB	\$72.75
2161178 SCRWs, DRYNL FN 6X1" 100PK	
H 2. PK @ \$4.79/PK	\$9.58
2161174 SCRWs, DRYNL CRS 7X2-1/2" 100PK	
H 1. PK @ \$11.99/PK	\$11.99
Item Total	94.32
H.S.T	12.26
HST5%	0.00
Sub Total	106.58

=====

Total Due 106.58
 DEBIT CARDS 106.58

=====

Elly 02 568387 12:54 pm 2022-Aug-19



RCP142030256887220819

=====

THANK YOU FOR SHOPPING AT HOME
 CLEARANCE ITEMS ARE NON RETURNABLE
 Regular priced /stocked items 30days

=====



2nd Avenue Home Hardware

TYPE: PURCHASE
 ACCT: CHEQUING
 AMOUNT: \$ 106.58
 Card Type: Interac

As a second example, attached as **Exhibit 6** is a copy of a Dollarama receipt dated August 23, 2022, in the amount of \$4.80, provided to us by Mr. Leduc. The amount was reconciled to the subtotal for 'Signs (including sign deposit)' of \$655.51, included under '1. Expenses subject to general spending limit' on Form 4. The receipt indicates that the payment was made by cash. However, KPMG was unable to reconcile this transaction to the statements for the Campaign Bank Account.



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024



We did not identify any transactions in the statements for the Campaign Bank Account that appeared to correspond to the 15 expenditures apparently made using debit card or cash. Further, from our interview with Mr. Leduc, we understand that he did not have a debit card for the Campaign Bank Account. Mr. Leduc also told us that he likely did not reimburse himself directly for these items. As a result, these transactions appear to be a contravention of subsection 88.22(1), paragraph (d) of the MEA as they were incurred for campaign purposes but were not paid or otherwise reimbursed from the Campaign Bank Account.

5.1.3.2 Response by Mr. Leduc

During our interview on November 28, 2023, Mr. Leduc told us the following:

- Mr. Leduc was not issued a debit card for the Campaign Bank Account;
- Mr. Leduc did have a cheque book for the Campaign Bank Account. However, use of those cheques would have required both the vendor to accept payment by cheques and a second signature on the cheque;
- Mr. Leduc likely did not reimburse himself for these transactions; and
- The related expenses were low dollar items and Mr. Leduc does not believe he has any evidence that he paid himself back.



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances
Report Date: May 24, 2024

5.1.4 Accounting for campaign signage from 2018 election

5.1.4.1 Summary of issue

Pursuant to subsection 88.19(3) of the MEA, *"Without restricting the generality of subsections (1) and (2), the following amounts are expenses: 1. The replacement value of goods retained by the person, individual, corporation or trade union from any previous election in the municipality and used in the current election."*

Table 2 of Form 4 lists inventory of campaign goods and materials from Mr. Leduc's 2018 municipal election campaign reused in the 2022 election campaign, totaling \$3,507.60. The two items recorded by Mr. Leduc are listed in the table below, as presented in Table 2 of Form 4:

Inventory of Campaign Goods and Materials from Previous Municipal Campaign used in this Campaign				
Description	Date Acquired (yyyy/mm/dd)	Supplier	Quantity	Current Market Value
Large signs	2018/07/31	Doc Signs	30	\$1,692.60
Small signs	2018/07/31	Doc Signs	110	\$1,815.00

KPMG noted that supporting documents provided by Mr. Leduc include copies of fourteen (14) invoices from Dr. Signs with dates ranging from August 20 to October 10, 2018, totaling \$6,350.91 including HST. We have summarized the invoices provided in **Schedule 1**. Of the fourteen (14) invoices provided, eleven (11) included purchases of either 24"x18" or 48"x32" size lawn signs. We understand that the 24"x18" size lawn signs constitute what Mr. Leduc included as *"Small signs"* and the 48"x32" size lawn signs constitute what Mr. Leduc included as *"Large signs"* in the 'Description' column on Table 2 of Form 4. The fourteen (14) copies of invoices provided by Mr. Leduc support the purchase of seventy one (71) large signs and four hundred and thirty nine (439) small signs, apparently for use during Mr. Leduc's 2018 election campaign.

Attached as **Exhibit 7** is a copy of two Dr. Signs invoices dated August 26, 2022, and September 27, 2022, in the amounts of \$338.53 and \$659.92, respectively, provided to us by Mr. Leduc to support purchases of six (6) large signs and forty (40) small signs for his 2022 election campaign.

The City of Greater Sudbury
 Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances
 Report Date: May 24, 2024

2335 LaSalle Blvd.
 Sudbury, ON.
 P3A-2A9
 Phone 705.479.6124
 Fax 705.222.3967
 toll free 1.866.694.SIGN
 e-mail privet@drsigns.net

INVOICE # :	DATE	PAGES
009519	26-Aug-22	

as per QUOTE(s)

Sold to:
 Contact: Bill Leduc

Ship to:
 Contact:

Item	Item Description	Qty.	Price	Amount	HST	MISC
1	New custom coroplast signs, 48x32, 4mm, 1 sided (48x32_Re-Elect)	6.00	49.93	299.58	38.95	

2335 LaSalle Blvd.
 Sudbury, ON.
 P3A-2A9
 Phone 705.479.6124
 Fax 705.222.3967
 toll free 1.866.694.SIGN
 e-mail privet@drsigns.net

INVOICE # :	DATE	PAGES
009583	27-Sep-22	

as per QUOTE(s)

Sold to:
 Contact: Bill Leduc

Ship to:
 Contact:

Item	Item Description	Qty.	Price	Amount	HST	MISC
1	new custom 2 sided 24x18 election signs	40.00	14.60	584.00	75.92	

In the table below, we have calculated the current market value of 30 large signs and 110 small signs apparently reused from Mr. Leduc's 2018 election campaign, based on the unit costs noted in Exhibit 7 for purchases made in 2022 for similar signs.

Recalculation of Current Market Value							
Inventory Item	Quantity per Table 2	Supplier	Invoice Number	Invoice Date	Price	HST	Current Market Value
	<i>a</i>				<i>b</i>	<i>c</i>	<i>a * (b + c)</i>
Large signs	30	www.DrSigns.net	009519	8/26/2022	\$ 49.93	\$ 6.49	\$ 1,692.63
Small signs	110	www.DrSigns.net	009583	9/27/2022	\$ 14.60	\$ 1.90	\$ 1,814.78

We are unable to confirm whether the quantity of signs recorded in Table 2 of Form 4 is complete and accurate.

5.1.4.2 Response by Mr. Leduc

During our interview on November 28, 2023, Mr. Leduc told us the following:



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances
 Report Date: May 24, 2024

- Following Greater Sudbury's 2018 municipal election, the election signs used by Mr. Leduc for his 2018 election campaign were stored outside, and as a result many were damaged due to exposure to the elements;
- Damaged signs were destroyed and discarded and were not used in the 2022 election campaign;
- The number of signs reported on Table 2 of Form 4 were exact and not an estimate; and
- Mr. Leduc utilized the price for the same sized signs purchased for the 2022 campaign from the same supplier, to calculate the replacement value or current market value of the recycled signs.

5.1.5 Other findings

5.1.5.1 Campaign Bank Account Transactions Apparently not Included on the Form 4

5.1.5.1.1 Summary of issue

During our review of the statements for the Campaign Bank Account, we identified three (3) transactions which did not appear to reconcile to the Form 4.

In the Table below, we have listed the three (3) transactions as they appear in the statements for the Campaign Bank Account:

Transactions in Campaign Bank Statements but not Form 4						
#	KPMG #	Transaction		Withdrawal Amount	Deposit Amount	Payee/Payor
		Date	Transaction Description			
1	99	7/27/2022	Transfer out to Member Shares #1	\$ 10.00	\$ -	Sudbury Credit Union
2	107	9/9/2022	Clearing Cheque #34	750.00	-	Nathalie Grenier
3	116	3/3/2023	System Generated Transfer In from newsud 4501801 Personal Chequing Account #2 For Grandparents Day	-	750.00	Personal Account of Mr. Leduc

We understand the following:

- Transaction #1 appears to relate to requirements of the Sudbury Credit Union at the time of opening the Campaign Bank Account, and we understand that no invoice exists for this transaction. KPMG reviewed a letter from Sudbury Credit Union dated October 25, 2023, explaining that this transaction relates to a required member share purchase,



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

as a Sudbury Credit Union condition of opening an account, and confirming that no receipt is available.

- Transaction #2 relates to invoice numbered #100 and dated September 6, 2022, for Nathalie Grenier (Nathalie's Online Deals), attached to this report as **Appendix D**. The invoice is billed to Mr. Leduc for, "Grandparents days" and lists various items purchased subtotaling \$1,328.00. There appears to be a discount listed as, "Other" for \$(750.64) for a net total of \$750.00. This transaction is discussed further in section 5.2.7.6.
- Transaction #3 appears to be a deposit to the Campaign Bank Account to reimburse the account from Mr. Leduc's personal funds, for a cheque written to Ms. Grenier in relation to the invoice discussed under transaction #2. The date of the deposit appears to be approximately 6 months after the invoice date. This transaction is discussed further in section 5.2.7.6.

5.2 Grandparent's Day 2022

In this section we have outlined our findings regarding Mr. Leduc's campaign finances in relation to Grandparent's Day 2022.

5.2.1 Summary of Issue

The Rioux Application alleges that Mr. Leduc campaigned for his election as Councillor, Ward 11 at Grandparent's Day 2022. Further, the decision by the Election Compliance Audit Committee to grant this compliance audit in response to the Rioux Application stated:

- *"The collective weight of the photographs and videos, and the Candidate's own admissions, demonstrates that the Candidate's election campaign was to some extent promoted at the Event. The Committee is of the opinion that in these factual circumstances, the cost of the prizes donated to the Event by the Candidate was a campaign expense because they were used, in part, for the Candidate's election campaign and the promotion of the Candidate's Candidacy", and*
- *"On that basis, the Committee is of the opinion that there are reasonable grounds to believe that: a. the Candidate failed to properly record all campaign expenses and campaign contributions in his financial statement, namely, the prizes he donated to the Event; and b. the Candidate paid for campaign expenses from personal funds, not from his campaign bank account."*

In consideration of these findings by the Election Compliance Audit Committee, KPMG has considered whether any additional contributions to the Grandparent's Day 2022 event by



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

Mr. Leduc and/or any third parties, and/or expenditures for Grandparent's Day 2022, may constitute exclusions from the Form 4, and therefore contraventions of the MEA with respect to campaign finances.

5.2.1.1 *Response by Mr. Leduc*

During our interview on November 28, 2023, Mr. Leduc told us the following:

- Grandparent's Day 2022 was not an election event. Mr. Leduc told KPMG he has signed witness statements supporting that assertion and they have been submitted as part of Mr. Leduc's response to the Rioux Application;
- Mr. Leduc did not bring any campaign materials to Grandparent's Day 2022;
- Another candidate for Councillor, Ward 11 (Christopher Duncanson-Hales) was campaigning at the event. Mr. Leduc told us he had offered Mr. Duncanson-Hales the opportunity to say a prayer at the event, but instead Mr. Duncanson-Hales used that opportunity to introduce himself as a candidate for Councillor, Ward 11. Mr. Leduc noted that Mr. Duncanson-Hales was distributing election materials at the event, and "actively campaigning";
- Mr. Leduc was not campaigning at the event and approached Mr. Duncanson-Hales to let him know that some attendees had complained to Mr. Leduc about Mr. Duncanson-Hales' actions. Mr. Duncanson-Hales responded along the lines of, "if it looks like a duck and walks like a duck then it must be a duck" (implying that Grandparent's Day 2022 did appear to be an election event); and
- Grandparent's Day 2022 and similar events have been held annually (with the exception of years during the COVID-19 Pandemic) and therefore the event exists only for the enjoyment of the senior community and their families.

5.2.1.2 *What constitutes a contribution for an election campaign?*

Pursuant to section 88.15(1) of the MEA, *"for the purposes of this Act, money, goods and services given to and accepted by a person for his or her election campaign, or given to and accepted by another person who is acting under the person's direction, are contributions."*

Pursuant to section 88.15(3) paragraph 3. of the MEA, *"If goods and services used in the person's election campaign or in relation to third party advertisements are purchased for less than their fair market value the difference between the market value and the amount paid."*



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances
Report Date: May 24, 2024

5.2.1.3 What constitutes an expense for an election campaign?

Pursuant to section 88.19(1) of the MEA, *"For the purposes of this Act, costs incurred for goods or services by or under the direction of a person wholly or partly for use in his or her election campaign are expenses."*

Pursuant to section 88.19(3) of the MEA, *"Without restricting the generality of subsections (1) and (2), the following amounts are expenses: ...*

2. The value of contributions of goods and services."

5.2.1.4 Maximum amount

Pursuant to section 88.20(6) of the MEA, *"During the period that begins on the day a candidate is nominated under section 33 and ends on his voting day, his or her maximum expenses shall not exceed an amount calculated in accordance with the prescribed formula.*

We understand the maximum amount refers to the General Spending Limit of \$14,159.60.

5.2.2 Similar events held in other years

During our interview with Mr. Leduc, we inquired regarding events similar to Grandparent's Day 2022 held in other years, if any, including Mr. Leduc's involvement in the same. Our objective in doing so was to explore whether Mr. Leduc's contributions to Grandparent's Day 2022 and/or a similar 2018 Event, if any, were different from years the event may have taken place in non-election years.

During our interview on November 28, 2023, Mr. Leduc told us the following:

- An event similar to Grandparent's Day 2022 was hosted at the Westmount Retirement Residence in each of 2018, 2019 and 2023;
- No similar event was held during the years 2020 or 2021 due to the COVID-19 pandemic;
- The events, including Grandparent's Day 2022, were always about recognizing and honoring grandparents, and providing a day for families to enjoy each other's company and were not campaign events;
- Mr. Leduc has signed witness statements supporting his assertion that Grandparent's Day 2022 was not a campaign event. The witness statements were submitted to the



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

Election Compliance Audit Committee as part of Mr. Leduc's response to the Rioux Application;

- Mr. Leduc did not campaign at Grandparent's Day 2022, or any of the other similar events; and
- Mr. Leduc has never displayed or distributed campaign materials, including signage or pamphlets at any of the Grandparent's Day 2022 or similar events.

However, in their Notice of Decision, the Election Compliance Audit Committee stated that:

- *"8. Photographs and videos provided to the Committee demonstrate that the Candidate did promote his candidacy at the Event. The Candidate took the position in his written responses that he was not campaigning at the Event, and provided letters from individuals in attendance at the Event stating that they did not see the Candidate campaigning at the Event. However, the Candidate's submissions and the letters provided by the Candidate, formed in near-absolute terms, are not credible in light of the photographs and videos which clearly demonstrate the Candidate's election campaign materials being displayed at or in proximity to the Event.*
- *9. The Applicant provided several photographs, taken from the Candidate's Facebook page, which showed the Candidate and several other individuals wearing a "Team Leduc" jacket at the Event. These jackets appeared in a Facebook post made by the Candidate before the Event wherein the Candidate indicates the jackets are associated with his election campaign. The Candidate also confirmed during the meeting that these "Team Leduc" jackets were used for his campaign and were worn at the Event.*
- *10. The Applicant also provided a photograph of the Candidate's vehicle with a magnetic election sign parked on a grass area outside the driveway to property where the Event was held. The Candidate's written response stated that his vehicle was not parked "on the Property," however when questioned by the Committee, the Candidate confirmed it was his vehicle depicted in the photograph ...*
- *12. The collective weight of the photographs and videos, and the Candidate's own admissions, demonstrates that the Candidate's election campaign was to some extent promoted at the Event. The Committee is of the opinion that in these factual circumstances, the cost of the prizes donated to the Event by the Candidate was a campaign expense because they were used, in part, for the Candidate's election campaign and the promotion of the Candidate's candidacy."*

KPMG notes that comments by the Election Compliance Audit Committee as included in the Notice of Decision appear to include findings with respect to Mr. Leduc's actions at Grandparent's Day 2022, which are inconsistent with comments made to KPMG by Mr. Leduc.

The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

5.2.2.1 2018 Grandparent's Day Event ("2018 Event")

During our November 28, 2023, interview with Mr. Leduc, we inquired regarding certain photographs alleged to have been taken at the 2018 Event, as included in the Rioux Application. During the interview, KPMG displayed the photograph included below as **Exhibit 8** for Mr. Leduc, noting that the photograph appears to show Mr. Leduc standing in front of a sign promoting his election campaign.



5.2.2.1.1 Response by Mr. Leduc

In relation to the above photograph, Mr. Leduc told us the following:

- The photograph appears to be from the 2018 Event;
- Mr. Leduc was unsure why there appears to be sign promoting Mr. Leduc's election campaign in the photograph, or how that sign came to be displayed at the event;
- At the time of the 2018 Grandparent's Day event, Mr. Leduc was not yet an elected official. Mr. Leduc recalls that he visited Westmount Retirement Residence well in advance of the 2018 Event. At that time, Mr. Leduc dropped off campaign materials inside the building. At the 2018 Event, Mr. Leduc believes the residents of Westmount



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances
Report Date: May 24, 2024

Retirement Residence who attended the 2018 Event may have chosen to show support in their own ways. Such support, Mr. Leduc noted, is outside of his control; and

- Mr. Leduc understood that Greater Sudbury residents who attended the event may have brought campaign materials with them, as a show of support, as he had not provided any at the event.

5.2.2.2 2023 Grandparent's Day Event ("2023 Event")

During our interview on November 28, 2023, we inquired regarding Mr. Leduc's involvement in the 2023 Event. In particular, KPMG inquired as to whether Mr. Leduc made financial contributions to the event commensurate with alleged contributions he made for Grandparent's Day 2022. Mr. Leduc told us the following:

- Mr. Leduc does not recall whether or not he contributed any prizes or made financial contributions to the 2023 Event;
- Mr. Leduc recalled that when he was made aware that the pizza would not be delivered on time in the course of the 2023 Event, he became concerned that older residents may become hungry. In response, Mr. Leduc sent his son to purchase approximately 100 cooked hotdogs from Costco, which he believes he paid for out of pocket. Mr. Leduc later clarified that the hot dog purchases were made for the Westmount Retirement residents only and not for the general public;
- Mr. Leduc's level of effort in planning and executing the event was in his opinion the same in 2023 as in prior years; and
- Mr. Leduc noted that the event has gained so much recognition with the community that sponsors have started to approach him directly without his solicitation, expressing interest in supporting the event.

5.2.3 Planning and promotion of the event

5.2.3.1 Promotion of the event

From our interviews with Mr. Leduc, Mr. Charette and Mr. Eyre, we understand the following:

- Grandparent's Day 2022 was jointly planned by Mr. Leduc and the Minnow Lake CAN. At that time, Mr. Eyre was Chair of the Minnow Lake CAN;
- Flyers advertising the event were distributed to local gas stations, a confectionary store, restaurants, etc.;



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

- The Minnow Lake CAN and the Minnow Lake Lions displayed invitations;
- Invitations were distributed to local school boards and schools, for communication to area faculty and students;
- Mr. Charette told us that Mr. Leduc invited him to attend Grandparent's Day 2022 while Mr. Leduc was campaigning door to door for his 2022 election campaign; and
- During our November 28, 2023, interview, KPMG asked Mr. Leduc if he recalled inviting residents to Grandparent's Day 2022 during his door-to-door campaigning activities. Mr. Leduc told us that the objective of campaigning in the community is to try to get to know the residents and vice versa. In doing so it is possible that Mr. Leduc would have mentioned the upcoming event to older residents.

5.2.3.2 *Soliciting in-kind donations and contacting vendors*

From our interviews with Mr. Leduc and Mr. Eyre, we understand that Mr. Leduc's responsibilities in relation to organizing Grandparent's Day 2022 included, but were not limited to, reaching out to event sponsors and vendors. We further understand that Mr. Leduc was responsible for coordinating prizes and games.

5.2.4 Campaign video filmed in part at Grandparent's Day 2022

The Rioux Application was submitted together with video clips and photographs taken at Grandparent's Day 2022 and the 2018 Event, apparently showing Mr. Leduc promoting his election campaign. Similar to Grandparent's Day 2022, the 2018 Event took place during a municipal election.

During KPMG's review of Mr. Leduc's General Ledger detail and related supporting documents for the Election Campaign Period, we identified an invoice from SocialRise Inc. numbered 1351 and dated September 26, 2023³. We understand from our interview with Mr. Leduc on November 28, 2023, that SocialRise Inc. was hired primarily to produce Mr. Leduc's campaign video. KPMG noted that the related expense was recorded in the amount of \$750 on September 16, 2022.

³ We understand from Mr. Leduc that when KPMG requested supporting documentation to be provided as part of the compliance audit, he was unable to locate the original invoice from SocialRise Inc., and therefore requested a copy of the invoice from the company. However, it appears that when SocialRise Inc. reprinted the invoice for Mr. Leduc, the date it was printed was recorded on the invoice in place of the original invoice date.



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

5.2.4.1 Response by Mr. Leduc

During our interview on November 28, 2023, Mr. Leduc told us the following:

- The video footage referenced in the Rioux Application was not filmed by SocialRise Inc. but rather an attendee of Grandparents Day 2022;
- Mr. Leduc did not recall whether or not he asked SocialRise Inc. to attend Grandparent's Day 2022; and
- Mr. Leduc's campaign video was produced in segments and an individual from SocialRise Inc. was following him around "a lot" at that time.

Following our interview with Mr. Leduc, we reached out to Mr. Connor LaRocque, CEO of SocialRise Inc. and he advised us of the following:

- Mr. LaRocque was on site at Grandparent's Day 2022 in order to follow Mr. Leduc around and get footage for the election campaign video;
- The filming of Mr. Leduc at Grandparent's Day 2022 by Mr. LaRocque "was not politically driven"; and
- Footage shot by SocialRise Inc. at Grandparent's Day 2022 may have been included in Mr. Leduc's final election campaign video.

Since the expense for Social Rise Inc. to produce Mr. Leduc's 2022 election campaign video appears to have been appropriately recorded, there are no apparent adjustments required to the Form 4. However, KPMG notes that Mr. Leduc's use of footage from the Grandparent's Day 2022 event for his election campaign video appears to support the Rioux Application's assertion that Mr. Leduc promoted his election campaign at (and/or through) attendance at the event.

5.2.5 Event description and activities

We understand that the following were elements of Grandparent's Day 2022, and were provided to attendees at no cost:

- Non-alcoholic beverages (e.g., soda);
- Pizza from Topper's Pizza;
- Chicken wings from the Hilton Garden Grille;
- Horse and buggy rides provided by Wagon Wheel Ranch;



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

- Live music provided by Rod Bazinet;
- Raffle prizes;
- A police car, ambulance and fire truck, provided by Greater Sudbury; and
- A small antique car show, offered by area car enthusiasts.

5.2.5.1 Volunteer 'thank you dinner'

From our review of the Form 4, together with our interviews with Mr. Leduc and Mr. Eyre, we understand that at least some of the volunteers who gave their time to help out at Grandparent's Day 2022 attended a thank you dinner hosted by Mr. Leduc following the event on September 11, 2022 (the "Volunteer Dinner"). With respect to the Volunteer Dinner, we note the following:

- The dinner took place at the Hilton Garden Grille in Greater Sudbury and was hosted by Mr. Leduc; and
- In the General Ledger detail for account '65071 Social Events' provided by Mr. Leduc in support of amounts included on the Form 4, KPMG noted an expense of \$467.82 on September 11, 2022, with the vendor name "Hilton Garden Grille". The invoice copy for Hilton Garden Grille dated September 12, 2022, provided to KPMG to support the transaction, is for 30 orders of chicken wings for \$550, including HST for an event dated September 11, 2022.
- During our interview on November 28, 2023, Mr. Leduc told us the following:
 - The Hilton Garden Grille expense included in the support for Mr. Leduc's Form 4 is not for food catered at Grandparent's Day 2022. Rather, it was for food at a thank you dinner for volunteers who helped out at Grandparent's Day 2022, following the event;
 - KPMG inquired as to why food to thank volunteers for assisting with Grandparent's Day 2022 constituted an election campaign expense if Mr. Leduc was not campaigning at the event. Mr. Leduc told us that approximately six (6) to eight (8) of the ten (10) to twelve (12) volunteers who helped with the event were also part of his campaign team. According to Mr. Leduc, those individuals had not originally intended to give their time to support the event. Per Mr. Leduc, the Minnow Lake Lions had originally offered to provide volunteer support to the event. However, due to a last-minute conflict for a funeral, the Minnow Lake Lions were unable to attend and therefore Mr. Leduc's campaign team stepped in; and



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances
Report Date: May 24, 2024

- Mr. Leduc told us that the Volunteer Dinner was jointly the kickoff meeting for his team's campaign activities later that evening.
- KPMG noted that the Hilton Garden Grille invoice provided by Mr. Leduc for \$550 and dated September 12, 2022, appears to be the invoice for 30 orders of chicken wings purchased for the Volunteer Dinner (i.e. the invoice indicates "function room rental" and a time of 6:00 – 8:00 p.m., consistent with Mr. Leduc's explanation. However, neither Mr. Leduc nor Mr. Eyre were able to locate a second Hilton Garden Grille invoice for \$467.82, which we understand was for the chicken wings served at Grandparent's Day 2022. It therefore appears that Mr. Leduc provided the correct invoice, but recorded the amount he paid, apparently for the \$467.82 invoice.

We note the following:

- If the invoice for \$550 is the correct invoice for the Volunteer Dinner, Mr. Leduc's expenses subject to the General Spending Limit appear to be understated by \$82.18 (i.e., \$550 - \$467.82); and
- In Section 5.2.7.7, we have summarized the impact of adjustments to the Form 4 amounts (i.e., contributions and expenses), in relation to Grandparent's Day 2022.

5.2.6 Sources of funding and event expenditures

As the former Chair of Minnow Lake CAN, Mr. Eyre maintained a summary of funding and expenditures for Grandparent's Day 2022 (the "Grandparent's Day 2022 Financial Summary"), attached as **Appendix E**. The information provided to KPMG with respect to funding for the event is summarized in the table below:

Funding source	Amount
Healthy Community Initiative	\$ 1,000.00
Minnow Lake Lions	300.00
Minnow Lake Credit Union	500.00
Minnow Lake CAN	427.45
Total	\$ 2,227.45

The information provided to KPMG by Mr. Eyre with respect to expenditures for Grandparent's Day 2022 is summarized in the table below:



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances
Report Date: May 24, 2024

Item	Vendor	Amount
Pizza	Topper's Pizza	\$ 445.20
Chicken wings	Hilton Garden Grille	550.00
Live music	Rod Basinet	300.00
Horse and buggy rides	Wagon Wheel Ranch	932.25
Total		\$ 2,227.45

We note the following:

- The \$550 recorded for chicken wings appears to be for the amount invoiced to Mr. Leduc for the Volunteer Dinner, as discussed in section 5.2.5.1. It appears therefore that the Minnow Lake CAN paid the invoice for the Volunteer Dinner in error. As a result, it appears that the Grandparent's Day 2022 Financial Summary overstates expenses by \$82.18 (i.e., \$550 - \$467.82), but does accurately reflect the cash expenditures of the Minnow Lake CAN for Grandparent's Day 2022; and
- In Section 5.2.7.7, we have summarized the impact of adjustments to the Form 4 amounts (i.e., contributions and expenses), in relation to Grandparent's Day 2022.

5.2.7 Apparent contraventions of the MEA in relation to Grandparent's Day 2022

The Election Compliance Audit Committee's decision in response to the Rioux Application noted that Mr. Leduc's election campaign, *"was to some extent promoted at the Event."* The Election Compliance Audit Committee then further noted that, *"The Committee is of the opinion that in these factual circumstances, the cost of the prizes donated to the Event by the Candidate was a campaign expense because they were used, in part, for the candidate's election campaign and the promotion of the Candidate's candidacy."*

KPMG notes that pursuant to subsections 88.15(1) and 88.15(3) of the MEA, money and the market value of goods and services given to and accepted by Mr. Leduc for his election campaign, are contributions. However, we understand that money, goods and services provided to the event were not intended to support Mr. Leduc's campaign. Absent evidence that individuals and organizations that provided funds indirectly through the Minnow Lake CAN, or provided money, or discounts on goods and services directly, intended for those amounts to be used by Mr. Leduc for his election campaign, they should not be treated as contributions.

However, pursuant to subsection 88.19(1) of the MEA, expenses incurred even "partly for use in an election campaign" are expenses and we understand should therefore be recorded in full on the Form 4. As a result, and pursuant to subsections 88.19(1) and 88.19(3) of the MEA, expenses related to Grandparents Day 2022, at market value, may constitute expenses in relation to Mr. Leduc's campaign.



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

5.2.7.1 *Non-alcoholic beverages donated to the event*

We understand from our interviews with Mr. Leduc and Mr. Eyre that beverages for the event were donated in part by Coca-Cola and in part by local grocers. We note that neither Mr. Leduc or Mr. Eyre maintained records of the specific vendors, contact information, quantity or value of beverages donated to the event by each vendor.

We note the following:

- If it was determined that Mr. Leduc promoted his election campaign at Grandparent's Day 2022, then pursuant to sections 88.19(1) and 88.19(3) of the MEA, the market value of donated beverages may be considered a campaign expense;
- Therefore, it appears that campaign expenses recorded on the Form 4 may be understated by the market value of the donated beverages. However, KPMG is unable to determine the amount of the apparent understatements since no record of the quantity or type of beverages donated is available for review; and
- In Section 5.2.7.7, we have summarized the impact of adjustments to the Form 4, in relation to Grandparent's Day 2022.

5.2.7.2 *Pizza for event attendees purchased from Topper's Pizza*

From our discussions with Mr. Leduc and Mr. Eyre, and as outlined in Section 5.2.5, we understand pizza for the event was purchased from Topper's Pizza in Greater Sudbury for \$445.20, including HST. Mr. Eyre provided us with a copy of the receipt for Topper's Pizza.

We note the following:

- It appears that there is no business name, date or address on the receipt. However, the total of \$445.20 per the receipt reconciles to the expense recorded by Mr. Eyre in the Grandparent's Day 2022 Financial Summary;
- Included under, "\$\$ your savings \$\$" on the receipt, a donation of \$103 is indicated, and appears to have been deducted before the total of \$445.20;
- We understand the pizza was ultimately paid for using funds of the Minnow Lake CAN;
- If it was determined that Mr. Leduc promoted his election campaign at Grandparent's Day 2022, then pursuant to sections 88.19(1) and 88.19(3) of the MEA, the donation of \$103.00 apparently deducted from the total, together with the purchase price of \$445.20 may be considered campaign expenses. Therefore, it appears that the expenses included on the Form 4 may be understated by \$548.20, in relation to the market value of pizza served at Grandparent's Day 2022; and



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

- In Section 5.2.7.7, we have summarized the impact of adjustments to the Form 4, in relation to Grandparent's Day 2022.

5.2.7.3 *Chicken wings for event attendees purchased from the Hilton Garden Grille*

From our discussions with Mr. Leduc and Mr. Eyre, and as outlined in Section 5.2.5, we understand that chicken wings for Grandparent's Day 2022 as well as for the Volunteer Dinner were purchased from the Hilton Garden Grille, located at the Hilton Garden Inn. Mr. Eyre provided us with a copy of an expense report summary from the Hilton Garden Inn.

We note the following:

- The expense report summary was addressed to "Bill Leduc" but his name appears to be crossed out with black marker on the copy provided to KPMG;
- There are two expenses for the Hilton Garden Grille included in the summary and dated September 12, 2022 (one day after Grandparent's Day 2022) for \$550.00 and \$467.82;
- As discussed in Section 5.2.5.1, we understand that the amount of \$467.82 relates to the purchase of chicken wings for Grandparent's Day 2022, and the amount of \$550 relates to the in-person Volunteer Dinner;
- We understand the chicken wings served to guests of Grandparent's Day 2022 were paid for using funds of the Minnow Lake CAN;
- If it was determined that Mr. Leduc promoted his election campaign at Grandparent's Day 2022, then pursuant to section 88.19(1) of the MEA, the purchase price of \$467.82 for the chicken wings served at Grandparent's Day 2022 may be considered a campaign expense. Therefore, it appears that the expenses included on the Form 4 may be understated by \$467.82, in relation to the chicken wings served at Grandparent's Day 2022; and
- In Section 5.2.7.7, we have summarized the impact of apparent adjustments to the Form 4, in relation to Grandparent's Day 2022.

5.2.7.4 *Horse and buggy rides for event attendees purchased from Wagon Wheel Ranch*

From our discussions with Mr. Leduc and Mr. Eyre, and as outlined in Section 5.2.5, we understand that Wagon Wheel Ranch was hired to provide horse and buggy rides to event attendees for a cost of \$932.25, including HST. Mr. Eyre provided us with a copy of an invoice from Wagon Wheel Ranch dated March 10, 2023. The invoice detail indicates that



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances
Report Date: May 24, 2024

the invoice was for three (3) hours of horse drawn trolley rides, at an event dated September 11, 2022.

We note the following:

- The invoice was addressed to the attention of "Linda Hachez, Treasurer-Ward 11 CAN";
- The invoice amount reconciles to the expense recorded by Mr. Eyre in the Grandparent's Day 2022 Financial Summary;
- We understand the invoice was ultimately paid for using funds of the Minnow Lake CAN;
- If it was determined that Mr. Leduc promoted his election campaign at Grandparent's Day 2022, then pursuant to section 88.19(1) of the MEA, the purchase price of \$932.25 for the horse and buggy rides may be considered a campaign expense. Therefore, it appears that the expenses included on the Form 4 may be understated by \$932.25, in relation to the horse and buggy rides offered at Grandparent's Day 2022; and
- In Section 5.2.7.7, we have summarized the impact of apparent adjustments to the Form 4, in relation to Grandparent's Day 2022.

5.2.7.5 *Live music for event attendees purchased from Rod Bazinet*

From our discussions with Mr. Leduc and Mr. Eyre, and as outlined in Section 5.2.5, we understand that Rod Bazinet was hired to perform live music at the event for a cost of \$300, including HST.

We note the following:

- Mr. Eyre was unable to locate a copy of the invoice received from Mr. Bazinet, if any;
- If it was determined that Mr. Leduc promoted his election campaign at Grandparent's Day 2022, then pursuant to section 88.19(1) of the MEA, the purchase price of \$300 for live music may be considered a campaign expense. Therefore, it appears that the expenses included on the Form 4 may be understated by \$300, in relation to live music provided to attendees at Grandparent's Day 2022; and
- In Section 5.2.7.7, we have summarized the impact of adjustments to the Form 4, in relation to Grandparent's Day 2022.



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

5.2.7.6 Event prizes purchased from Nathalie's Online Deals

From our discussions with Mr. Leduc, we understand that Grandparent's Day 2022 included a raffle for prizes, which were provided by Mr. Leduc.

We note the following:

- During our review of the monthly statements for Mr. Leduc's Campaign Bank Account during the Election Campaign Period, and as discussed in Section 5.1.5.1, KPMG identified a withdrawal of \$750 on September 9, 2022, paid to Nathalie Grenier, and a deposit of \$750 on March 3, 2023, apparently paid from Mr. Leduc's personal funds;
- Mr. Leduc told KPMG that he paid for the prizes by cheque from his Campaign Bank Account since Nathalie's Online Deals did not accept credit or debit card payments and he did not have sufficient cash on hand. Mr. Leduc asserted that since he did not have any personal cheques, he used one of the cheques from his Campaign Bank Account out of necessity;
- Mr. Leduc provided to KPMG a copy of an invoice dated September 6, 2022, for \$750 including HST, from Nathalie's Online Deals:
 - The invoice lists three (3) pages of items apparently purchased by Mr. Leduc as prizes for Grandparent's Day 2022. Examples of items purchased include a window-mount air conditioner, an electric "ride on" jeep for children, an iron, jewelry and watches;
 - The bottom of the invoice includes a credit of \$750.64, which is deducted from an original total of \$1,328 before HST (i.e., \$1,500.64 including 13% HST), resulting in a balance of \$750 payable. No information is included with respect to nature of the discount (i.e., whether the discounted total represents a price paid by Mr. Leduc which is less than the market rate available to customers);
 - Mr. Leduc told us that he is unsure of the nature of the discount provided on the invoice from Nathalie's Online Deals;
 - KPMG attempted to contact Ms. Grenier, the apparent owner of Nathalie's Online Deals, by phone on December 1, 2023, and by email on December 5, 2023, but was unsuccessful. From an online review, it appears that Nathalie's Online Deals is no longer operating a physical store; and
 - Since KPMG was unable to verify the nature of the credit included on the invoice, KPMG has assumed \$750 was the market value of the prizes.



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

- KPMG was unable to reconcile the withdrawal or deposit of \$750 to the Form 4. Mr. Leduc provided to KPMG a written explanation of the transactions, including with respect to timing. Attached below as **Exhibit 9** is a copy of the written explanation provided by Mr. Leduc. We understand from Mr. Leduc's explanation that he is asserting that the timing difference between the date the funds were taken from the Campaign Bank Account to pay \$750 to Nathalie's Online Deals and the date of repayment from Mr. Leduc's personal account, resulted from a lack of response to his inquiry by Robert Miller (Mr. Leduc's prior accountant) and a subsequent need to find a new accountant to prepare the Form 4;

Back in 2018 when I was first elected I used Robert miller Accounting services to do my election expenses, so when I was re-elected in 2022 I naturally took my receipts back to Robert Millers Accounting services and did this in November one question I asked Mr. Miller if this was allowable and he never gave me an answer as he would look into it. As time was getting short and me calling Mr. Miller regarding my election expenses, he finally informed me because my expenses we're over the 10,000. Limit he couldn't do my election expenses as it now had to be done by a chartered Account. So when I found this information out I was out of the country and had to scramble to find a chartered accountant, still not having the answer that I had to replace the money by Dec 31st/22 this was why the money was replaced in early March.

- If it was determined that Mr. Leduc promoted his election campaign at Grandparent's Day 2022, then pursuant to section 88.15(1) of the MEA, the personal funds used to repay the Campaign Bank Account in relation to \$750 spent from the Campaign Bank Account at Nathalie's Online Deals may be considered a campaign contribution from candidate or spouse. Therefore, it appears that the contributions in goods and services from candidate or spouse included on the Form 4 may be understated by \$750. Further, pursuant to section 88.19(1) of the MEA, the apparent purchase price of \$750 for raffle prizes may be considered a campaign expense. Therefore, it appears that the expenses included on the Form 4 may be understated by \$750, in relation to items purchased from Nathalie's Online Deals for Grandparent's Day 2022; and
- In Section 5.2.7.7, we have summarized the impact of adjustments to the Form 4, in relation to Grandparent's Day 2022.

5.2.7.7 Summary of Adjustments to the Form 4

In Schedule 2, KPMG has made adjustments to the contributions and/or expenses subject to the General Spending Limit, for each of the apparent contraventions of the MEA with respect to Grandparent's Day 2022. We have summarized the aggregate impact to Form 4 below.



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

Summary of Adjustments to the Form 4 for apparent contraventions of the MEA with respect to Grandparent's Day 2022				
			Adjustments	Total
KPMG Report Ref.	Appendix B		5.2.5.1, 5.2.7.1 to 5.2.7.6, Schedule 2	
Contributions				
Contributions in goods and services from candidate and spouse	\$ 3,507.60		750.00	4,257.60
Total value of contributions exceeding \$100 per contributor	14,050.00		-	14,050.00
Total amount of contributions	17,557.60		750.00	18,307.60
Expenses subject to general spending limit				
Inventory from previous campaign used in this campaign	3,507.60		-	3,507.60
Advertising	6,985.79		-	6,985.79
Brochures/flyers	655.51		-	655.51
Signs (including sign deposit)	1,699.31		-	1,699.31
Meetings hosted	1,067.28		82.18	1,149.46
Office expenses incurred until voting day	101.61		-	101.61
Other (Grandparent's Day 2022)	-		2,998.27	2,998.27
Total expenses subject to general spending limit	\$ 14,017.10		3,080.45	17,097.55
General Spending Limit				14,159.60
Expense amount apparently in excess of the General Spending Limit				\$ 2,937.95

We note the following:

- Prior to any adjustments, Mr. Leduc had reported expenses subject to the General Spending Limit of \$14,017.10 on the Form 4;
- The General Spending Limit for Mr. Leduc's 2022 election campaign, as outlined on the Form 4, was \$14,159.60. Therefore, an adjustment to increase expenses subject to the General Spending Limit of greater than \$142.50 (i.e., \$14,159.60 - \$14,017.10) would result in Mr. Leduc's expenses subject to the General Spending Limit being in excess of the amount allowed;
- As outlined on Schedule 2, the adjustments calculated by KPMG as a result of apparent contraventions of the MEA range from \$82.18 to \$932.25 for expenses subject to the General Spending Limit, and there is a single adjustment to contributions of \$750;
- Five (5) of the six (6) adjustments to the General Spending Limit would cause Mr. Leduc's expenses subject to the General Spending Limit to exceed the maximum



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

amount of \$14,159.60, representing a contravention of the MEA, pursuant to section 88.20(6); and

- Prior to any adjustments, Mr. Leduc had reported Contributions from Candidate and Spouse of \$3,507.60. The limit for Contributions from Candidate and Spouse was \$7,155.20, as outlined on the Form 4. Therefore, a net adjustment to contributions attributed to Mr. Leduc or his wife greater than \$3,647.60 (i.e., \$7,155.20 - \$3,507.60) would result in Mr. Leduc's contributions in this category to exceed the maximum amount allowed. Therefore, the apparent adjustment to increase contributions by Mr. Leduc and his wife by \$750.00 would not cause Mr. Leduc to exceed the maximum amount.

Yours truly,

A handwritten signature in black ink, appearing to read 'Oscar Poloni', with a stylized flourish at the end.

Oscar Poloni, CPA, CA, LPA

Partner

cc. Kas Rehman, CPA, CA, CFE, CFF

Partner, Forensic Services



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

A Appendix A: Scope of Review

Our comments, calculations and analysis as contained in this report are based on our review of the following information:

A.1 Documents and information accessed on the Greater Sudbury website, at the link below:

<https://www.greatersudbury.ca/city-hall/mayor-and-council/meetings-agendas-and-minutes/>

- Election Compliance Audit Committee Agenda for Thursday, April 27, 2023
- Copy of Applicant's Presentation.PDF, as presented to the Compliance Committee on April 27, 2023
- Applicant Submission – Campaign Video.mp4 as submitted to the Election Compliance Audit Committee by Anastasia Rioux in relation to the April 27, 2023, Compliance Committee meeting
- Copy of the Candidate Submission, as prepared by William (Bill) Leduc and presented to the Election Compliance Audit Committee on April 27, 2023
- Notice of Decision by the Election Compliance Audit Committee, in the matter of a Meeting of the Election Compliance Audit Committee, held Thursday, April 27, 2023
- Election Compliance Audit Committee Agenda for Thursday, May 25, 2023
- Copy of Applicant Submission_Duncanson-Hales.PDF, as presented to the Election Compliance Audit Committee on May 25, 2023
- Copy of Candidate Submission_Leduc.PDF, as presented to the Election Compliance Audit Committee on May 25, 2023
- Applicant Submission – Video 1.mp4 as submitted to the Election Compliance Audit Committee by Christopher Duncanson-Hales in relation to the May 25, 2023, Election Compliance Committee meeting
- Applicant Submission – Video 2.mp4 as submitted to the Election Compliance Audit Committee by Christopher Duncanson-Hales in relation to the May 25, 2023, Election Compliance Audit Committee meeting



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

- Applicant Submission – Video 3.mp4 as submitted to the Election Compliance Audit Committee by Christopher Duncanson-Hales in relation to the May 25, 2023, Election Compliance Audit Committee meeting
- Applicant Submission – Video 4.mp4 as submitted to the Election Compliance Audit Committee by Christopher Duncanson-Hales in relation to the May 25, 2023, Election Compliance Audit Committee meeting
- Applicant Submission – Video 5.mp4 as submitted to the Election Compliance Audit Committee by Christopher Duncanson-Hales in relation to the May 25, 2023, Election Compliance Audit Committee meeting
- Applicant Submission – Video 6a.mp4 as submitted to the Election Compliance Audit Committee by Christopher Duncanson-Hales in relation to the May 25, 2023, Election Compliance Audit Committee meeting
- Applicant Submission – Video 6b.mp4 as submitted to the Election Compliance Audit Committee by Christopher Duncanson-Hales in relation to the May 25, 2023, Election Compliance Audit Committee meeting
- Notice of Decision by the Election Compliance Audit Committee, in the matter of a Meeting of the Election Compliance Audit Committee, held Thursday, May 25, 2023

A.2 Documents provided to KPMG by Mr. Leduc

- Cover letter written by the document preparer (unknown) outlining their process to organize Mr. Leduc's package of information
- Summary of information provided to support the Form 4
- Letter from Sudbury Credit Union explaining \$10 member share purchase requirement
- Bank statements for Sudbury Credit Union election bank account with account number ending 237, for the Election period
- Receipt for municipal election filing fee
- Form 4, with handwritten notation
- Form 4, including auditor's report
- Copies of cheques and invoices to support purchases included in Campaign Bank Account and General Ledger detail



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances
Report Date: May 24, 2024

- Account detail for complete contribution and expense accounts
- Invoice for Eric Moles, CPA (bookkeeper)
- Copies of donation receipts issued to contributors
- Declaration of respondent re the Rioux Application
- Written explanations to support current value of sign inventory reused from 2018 election
- Written explanation Re: prizes purchased from Nathalie's Online Deals (Nathalie Grenier)
- Copies of bank deposit slips
- Email from Joseph Nicholls, Chief, Greater Sudbury Fire & Paramedic Services outlining the City's policy on use of municipal vehicles for community engagement at events

A.3 Other

- The Municipal MEA, 1996
- The 2022 'Candidates' Guide – Ontario municipal council and school board elections'
- Summary of event funding and expenditures, as prepared by Dean Eyre, former Chair of Minnow Lake CAN
- Invoice for Wagon Wheel Ranch dated for \$932.25 'Horse drawn trolley rides at your Event date September 11, 2022
- Copy of cheque stub for cheque numbered 005 to Topper's Pizza for \$445.22, undated
- Copy of receipt from Topper's Pizza indicating total of \$445.22 and indicating a "*donation*" of \$103
- Copy of invoice from the Hilton Garden Inn totaling \$1,017 dated September 12, 2022, with invoice detail showing receipt of cheques for \$550 and \$467.82 and final credit balance (e.g. overpayment) of \$0.82.



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

B Appendix B: The Financial Statement – Auditor's Report Candidate – Form 4



Financial Statement – Auditor's Report Candidate – Form 4 Municipal Elections Act, 1996 (Section 88.25)

Instructions

All candidates must complete Boxes A and B. Candidates who receive contributions or incur expenses must complete Boxes C, D, Schedule 1 and Schedule 2 as appropriate. Candidates who receive contributions or incur expenses in excess of \$10,000 must also attach an Auditor's Report.

All surplus funds (after any refund to the candidate or their spouse) shall be immediately paid to the clerk who is responsible for the conduct of the election.

For the campaign period from (day clerk received nomination) 2 0 2 2 | 0 5 | 0 2 to 2 0 2 2 | 1 2 | 3 1

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

Box A: Name of Candidate and Office

Candidate's name as shown on the ballot

Last Name or Single Name
Leduc

Given Name(s)
William

Office for Which the Candidate Sought Election
Councillor

Ward Name or Number (if any)
Ward 11

Municipality

City of Greater Sudbury

Spending Limit

General
\$14,159.60

Parties and Other Expressions of Appreciation
\$1,415.96

Contribution Limit

Contributions from Candidate and Spouse
\$7,155.20

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

Box B: Declaration

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

Handwritten signature of William Leduc

Signature of Candidate

Handwritten date: MFL 23/23

Date (yyyy/mm/dd)

Table with 4 columns: Date Filed (yyyy/mm/dd), Time Filed, Initial of Candidate or Agent (if filed in person), Signature of Clerk or Designate. Contains handwritten entries: 2023/03/23, 11:04am, and a signature.

COPY

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)	+ \$	17,557.60
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.	+ \$	
6.	+ \$	

Total Campaign Income (Do not include loan)

= \$ 17,557.60 C1

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

1. Expenses subject to general spending limit

Inventory from previous campaign used in this campaign (list details in Table 2 of Schedule 1)

Advertising	+ \$	3,507.60
Brochures/flyers	+ \$	6,985.79
Signs (including sign deposit)	+ \$	655.51
Meetings hosted	+ \$	1,699.31
Office expenses incurred until voting day	+ \$	1,067.28
Phone and/or internet expenses incurred until voting day	+ \$	101.61
Salaries, benefits, honoraria, professional fees incurred until voting day	+ \$	
Bank charges incurred until voting day	+ \$	
Interest charged on loan until voting day	+ \$	
Other (provide full details)		

1.	+ \$	
2.	+ \$	
3.	+ \$	
4.	+ \$	
5.	+ \$	
6.	+ \$	

Total Expenses subject to general spending limit

= \$ 14,017.10 C2

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

1. Campaign celebration	+ \$	1,415.96
-------------------------	------	----------

COPY

2.	_____	+ \$	_____
3.	_____	+ \$	_____
4.	_____	+ \$	_____
5.	_____	+ \$	_____
Total Expenses subject to spending limit for parties and other expressions of appreciation		= \$	1,415.96 C3

3. Expenses not subject to spending limits

Accounting and audit	+ \$	2,825.00
Cost of fundraising events/activities (list details in Part IV of Schedule 2)	+ \$	_____
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.	+ \$	_____
4.	+ \$	_____
5.	+ \$	_____
Other (provide full details)		
1.	+ \$	_____
2.	+ \$	_____
3.	+ \$	_____
4.	+ \$	_____
5.	+ \$	_____
Total Expenses not subject to spending limits	= \$	2,825.00 C4

Total Campaign Expenses (C2 + C3 + C4) = \$ 18,258.06 C5

Box D: Calculation of Surplus or Deficit

Excess (deficiency) of income over expenses (Income minus Total Expenses) (C1 - C5)	+ \$	-700.46	D1
If there is a surplus, deduct any refund of candidate's or spouse's contributions to the campaign	- \$	_____	
Surplus (or deficit) for the campaign	= \$	-700.46	D2

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

COPY

Schedule 1 – Contributions

Part I – Summary of Contributions

Contributions in money from candidate and spouse	+ \$	
Contributions in goods and services from candidate and spouse (Include value listed in Table 1 and Table 2)	+ \$	3,507.60
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 Table 3 and Table 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).	+ \$	14,050.00
Less: Ineligible contributions paid or payable to the contributor Contributions paid or payable to the clerk, including contributions from anonymous sources exceeding \$25	- \$	
	- \$	
Total Amount of Contributions (record under Income in Box C)	= \$	17,557.60 1A

Part II – Contributions from candidate or spouse

Table 1: Contributions in goods or services

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

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

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

Description	Date Acquired (yyyy/mm/dd)	Supplier	Quantity	Current Market Value (\$)
Large signs	2018/07/31	Doc Signs	30	1,692.60
Small signs	2018/07/31	Doc Signs	110	1,815.00
Total				3,507.60

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

COPY

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

Table 3: Monetary contributions from individuals other than candidate or spouse

Name	Full Address	Date Received (yyyy/mm/dd)	Amount Received (\$)	Amount Returned to Contributor or Paid to Clerk (\$)
Mark Burgess	1853 Torbay Rd Sudbury, ON P3B 1A3	2022/07/21	1,000.00	
David Anselmo	828 Beatrice Cres Sudbury ON P3A 3E5	2022/07/25	1,000.00	
Norm Bouffard	1301 Drummond Ave Sudbury ON P3A 4Y9	2022/07/27	1,000.00	
Robert Lamoureux	2093 Greenwood Dr Sudbury ON P3B 1A2	2022/07/29	500.00	
Stephane Leclair	543 Moonlight Beach Rd Sudbury ON P3B 1A2	2022/08/02	1,000.00	
David Khouri	95 Bayside Cres Sudbury ON P3B 0B9	2022/08/03	500.00	
Gerard Morin	10 Cana Crt Sudbury ON P3A 5R1	2022/08/03	300.00	
Vincenzo Marando	1469 Canterbury St Sudbury ON P3A 1H7	2022/08/03	500.00	
Barry Lacroix	861 Lapointe St Sudbury ON P3A 5N8	2022/08/04	1,000.00	
Alex Scott	2577 Dube Rd Sudbury ON P3B 1A1	2022/08/05	750.00	
Anna Villano	201 Hollybrook Cres Azilda ON P0M 1B0	2022/08/09	1,000.00	
Mike Vallano	269 David St Sudbury ON P3E 1T7	2022/08/09	1,000.00	
Frank Villano	F421-1290 Bancroft Dr Sudbury ON P3B 4G9	2022/08/09	1,000.00	
Kristi Arnold	857 Roderick Ave Sudbury ON P3E 6J5	2022/08/11	500.00	
Ronald Belanger	100 Radisson Ave Chelmsford ON P0M 1L0	2022/08/11	500.00	
Paul Zulich	340 Ramsey Lake Rd Sudbury ON P3E 6H4	2022/08/25	500.00	
John Zulich	531 Lake Point Crt Sudbury ON P3E 6J3	2022/08/24	500.00	
Angelo Butera	2078 York Rd Niagara On The Lake ON L0S 1J0	2022/09/27	500.00	
Michael Crupi	50 Moses Cres Markham ON L5C 1S5	2022/09/29	1,000.00	
Total			14,050.00	

COPY

Schedule 2 – Fundraising Events and Activities

Complete a separate schedule for each event or activity held.

Additional schedule(s) attached, if completed manually.

Fundraising Event/Activity 1

Description of fundraising event/activity _____

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

Part I – Ticket revenue

Admission charge (per person)

\$ _____ 2A

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

Number of tickets sold

x _____ 2B

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

= \$ _____

Part II – Other revenue deemed a contribution

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

- 1. _____ + \$ _____
- 2. _____ + \$ _____
- 3. _____ + \$ _____
- 4. _____ + \$ _____
- 5. _____ + \$ _____

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

= \$ _____

Part III – Other revenue not deemed a contribution

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

- 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. _____ + \$ _____

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

= \$ _____

COPY

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

Municipality City of Greater Sudbury	Date (yyyy/mm/dd) 2023/03/22
---	---------------------------------

Contact Information

Last Name or Single Name Moles	Given Name(s) Eric	Licence Number 1-9236
-----------------------------------	-----------------------	--------------------------

Address	Suite/Unit Number 210	Street Number 109	Street Name Elm Street
---------	--------------------------	----------------------	---------------------------

Municipality Sudbury	Province Ontario	Postal Code P3C 1T4
-------------------------	---------------------	------------------------

Telephone Number 705-673-8233	Email Address emoles@persona.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 95 of the *Municipal Elections Act, 1996*. Under section 88 of the *Municipal Elections Act, 1996* (and despite anything in the *Municipal Freedom of Information and Protection of Privacy Act*) documents and materials filed with or prepared by the clerk or any other election official under the *Municipal Elections Act, 1996* are public records and, until their destruction, may be inspected by any person at the clerk's office at a time when the office is open. Campaign financial statements shall also be made available by the clerk in an electronic format free of charge upon request.



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

C Appendix C: KPMG interview notes for Mr. Leduc's interview on November 28, 2023, and Mr. Leduc's comments provided December 26, 2023

Date	November 28, 2023
Time	11:30 a.m.
Meeting Organizer	KPMG
Meeting Location	Microsoft Teams
Interviewee Name	William (Bill) Leduc (“BL”)
Interviewee Role	Ward 11 Councillor, City of Greater Sudbury
KPMG Interviewers	<ul style="list-style-type: none"> • Kas Rehman (“KR”) • Tyler Reavell (“TR”)

Administration/Introduction

- Brief introduction by KR and TR
- KR provided the following information to BL:
 - The City of Greater Sudbury has engaged KPMG to complete a compliance audit of BL’s campaign expenses and the related financial statements, relating to the 2022 Municipal Election.
 - KPMG’s role is to conduct a compliance audit of BL’s election campaign finances, in accordance with subsection 88.33 of the Municipal Elections Act.
 - KPMG have completed our preliminary review of BL’s candidate financial statement, including the related supporting documents that BL provided to our engagement team.
 - KPMG have also reviewed the documents presented at the April 27, 2023, meeting of the City of Greater Sudbury’s Election Compliance Committee.
 - KPMG have identified several items that we wish to discuss with BL today, in order to obtain BL’s comments and input regarding our preliminary findings.
 - KPMG will not record the interview today. Instead, we will take notes throughout our discussion. Following our discussion, we will consolidate our (Kas’ and Tyler’s) notes and provide them to BL for review. We asked that BL review the notes to ensure they completely and accurately present the information discussed, and return them to KPMG together with BL’s signature and date, confirming the same.
 - If any changes to our prepared summary of the discussion are required following BL’s review, we will make the necessary changes.

1. Apparently accepting \$500 of cash toward contribution by Norm Bouffard

- TR noted that included in the documents BL provided to KPMG in relation to this review, there were photocopies of five (5) \$100 bills, which appear to be related to the \$1,000 contribution you received from Norm Bouffard on July 27, 2022.
- TR inquired as to whether or not BL was aware that in accordance with subsection 88.8(8) of the Municipal Elections Act, contributions exceeding \$25, *“shall not be contributed in the form of cash and shall be contributed in a manner that associates the contributor’s name and account with the payment or by a money order signed by the contributor 2016”*?
- BL recalled that Mr. Bouffard desired to make a contribution of \$1,000 to BL, but Mr. Bouffard’s wife wanted to limit their contribution to BL to \$500. As a result, Mr. Bouffard provided BL a cheque for \$500, but also provided \$500 of cash.

- BL told KPMG that his intention in photocopying the five (5) \$100 bills was to demonstrate where the contribution had come from.

2. Three bank drafts provided for the \$1,000 (per person) contributions of Anna, Mike and Frank Villano

- TR noted that included in the documents BL provided to KPMG, there were copies of (3) \$1,000 bank drafts, which appear to have been drawn on the account(s) of one person, Ms. Anna Maria Villano.
- TR noted that the bank drafts appear to be related to three contributions recorded on Part III of BL's audited campaign financial statement. The contributions were listed under the names of Anna Maria Villano, Mike Villano and Frank Villano and were dated August 9, 2022. The contribution receipts you provided list separate addresses for each of Anna Maria, Mike and Frank.
- TR asked BL if there is any information or context that he wishes to provide in relation to this?
- BL told KPMG that:
 - The Villanos work in Ward 11
 - They own some apartment buildings.
 - Ms. Anna Maria Villano works for her father and Mike Villano owns a construction company.
 - The three Villanos listed as contributors to BL's campaign all live in separate households.
 - BL understood that the donations provided by the Villanos were three separate donations.
 - BL did not notice that all of the bank drafts were in the name of Ms. Anna Maria Villano and therefore did not inquire as to why.
 - BL does not recall informing the Villanos about the \$1,200 limit per individual.
- KR inquired about the logistics of how BL received the bank drafts.
- BL told KPMG that Ms. Anna Maria Villano called him and advised that the bank drafts were ready for pick up. Mr. Leduc went to Ms. Anna Maria's place of work to collect the bank drafts. At that time, Mr. Leduc wrote out the receipts for each of Anna Maria, Mike and Frank.

3. Apparent campaign expenses paid by debit or cash



- TR noted that included in the documents BL provided to KPMG, there were copies of receipts and/or invoices for campaign expenses which appear not to have been paid from BL's campaign bank account (i.e., they were paid by debit or cash, but were not traced to BL's campaign bank account). However, the amounts appear to have been recorded as campaign expenses. The total of these items appears to be \$307.14.

- TR asked BL if there is any information or context that he wishes to provide in relation to this?
- BL told KPMG that his campaign bank account did not have a debit card. Therefore, anything purchased required dual signatures, since he only had a cheque book. BL also noted that few businesses accept cheques.
- TR asked BL if he maintained a record of reimbursement for these amounts, from the campaign bank account.
- BL told KPMG that he used the balance of the funds in the campaign bank account at the time it was closed to pay his accountant, Mr. Eric Moles. BL noted that he probably did not reimburse himself for those campaign expenses paid from his personal account, or by cash.
- BL told KPMG that these expenses were low dollar items and he likely does not have any evidence that he paid himself back.

4. Accounting and adjustment for used sign inventory

- TR inquired how BL determined the replacement value of signs used for his campaign, which were from his previous election campaign (2018).
- BL told KPMG that following his 2018 campaign, his election signs had been stored outside and as a result, several were damaged.
- BL advised that the number of signs he used, and as reported, was exact and not an estimate.
- BL told KPMG that the value of the signs reported on his campaign financial statements were based on an invoice from the same supplier, for signage purchased new for the 2022 campaign.
- BL also told KPMG that the damaged signs were destroyed and discarded, and were not used for the 2022 campaign.

5. BL's campaign video

- TR told BL that we had watched his campaign video, as referenced in the application for a compliance audit of BL's campaign finances. TR inquired as to whether the footage included in the video which was allegedly of BL at the 2022 Grandparent's Day event was shot by a professional photographer?
- BL told KPMG that the campaign video was produced by a company called Social Rise, for which he has provided KPMG the invoice.  ¹
- TR inquired as to the date on the Social Rise invoice provided, which appears to be from Fall 2023.
- BL responded that the invoice was reprinted, in response to our requests for this audit. BL was unable to locate the original invoice and the replacement provided to him by social rise had a current date.  ²
- TR inquired as to whether BL asked Social Rise to attend the 2022 Grandparent's Day event?

Summary of Comments on Appendix C - Leduc final interview notes.pdf


Page: 3

Number: 1 Author: 232501 Subject: Sticky Note Date: 12/26/2023 7:13:39 PM


BL responds that footage referenced in the application is not video footage that his campaign paid for in the invoice. This footage is taken by another person, her name being Col Ette on FB. She has since deleted footage from FB and BL has been told that she has commented that she deleted photos of Grand Parents' Day.

Number: 2 Author: 232501 Subject: Sticky Note Date: 12/26/2023 7:16:55 PM


In August of 2022 BL retained Social Rise and they were paid by cheque for the services. It is a simple error on dates when asked for a reprint of the invoice.




- BL told KPMG that the campaign video was produced in segments. BL advised KPMG that he does not recall whether or not he asked Social Rise to attend Grandparent's Day, but noted that they were following him around a lot at that time.
- BL told KPMG that he does not recall details of instructions he provided to Social Rise and advised KPMG that we should speak with Conner Lerock (sic) at Social Rise, if we have any further specific questions. 


6. Grandparent's Day Contributions (e.g. food/drink, photography/videography, entertainment)

- KR raised the topic of the 2022 Grandparent's Day event hosted at the Westmount Retirement Residence, and advised BL that we have some questions about the event. KR asked BL to provide his perspective on the event, including who planned it, and BL's involvement.
- BL told KPMG the following:
 - Grandparent's Day was not an election event. Mr. Leduc noted that he has signed witness statements supporting this assertion, as included in his response to the application for this audit.
 - Grandparent's Day took place in 2018, 2019, 2022 and 2023. Each year the event has gotten 'bigger'.
 - BL did not bring any campaign materials to the Grandparent's Day event.
 - Another candidate for Ward 11, Chris Ducanson-Hales attended the Grandparent's Day event and was actively campaigning. BL had offered Mr. Ducanson-Hales an opportunity to say a prayer at the event, but instead Mr. Ducanson-Hales took the opportunity to introduce himself as a candidate for Councillor, Ward 11. According to BL, Mr. Ducanson-Hales was distributing election materials at the event, and actively campaigning.
 - BL did not campaign at the event. As a result, BL approached Mr. Ducanson-Hales and told him that some of the event attendees were complaining about his campaign activities, and that this was not an election event. Mr. Ducanson-Hales responded to BL that, "if it looks like a duck and walks like a duck then it must be a duck" (implying that Grandparent's Day did appear to be an election event). 

Similarities or differences between the 2022 Grandparent's Day event and other years

- TR asked BL if there was anything different about the 2022 Grandparent's Day event. Specifically, TR asked BL if he had done any campaigning at the 2018 Grandparent's Day event (the most recent Grandparent's Day event prior to 2022, which took place during an election year).
- BL told KPMG that Grandparent's Day events have always been about recognizing and honoring Grandparents and providing a day for families to enjoy each other's company. BL stated that he has not campaigned at any Grandparent's Day events and has never brought campaign materials to Grandparent's Day events. 

-
-  Number: 1 Author: 232501 Subject: Sticky Note Date: 12/26/2023 7:19:51 PM
Video and photos taken by Social Rise during Grand Parents' day were at their discretion and were used only to demonstrate BL's involvement with the community.
-
-  Number: 2 Author: 232501 Subject: Sticky Note Date: 12/26/2023 7:26:04 PM
As noted above Grand Parents' Day has been held annually outside of the COVID-19 time and 2019 and 2023 were not election years, therefore the event only exists for the enjoyment of the senior community and their families. Mr. Duncanson-Hales has his own perception which BL has no control of.
-
-  Number: 3 Author: 232501 Subject: Sticky Note Date: 12/26/2023 7:35:51 PM
In 2018 BL was not an elected official. He attended Westmount Retirement with campaign materials several weeks ahead of the concept of a celebration for seniors being developed. Campaign materials were left inside the building and residents chose to show their support to BL on their own accord. Such a show of support is again, not in the control of BL.

- TR asked BL whether he had made any personal financial contributions to the 2023 Grandparent’s Day event.
- BL told KPMG that he could not recall whether or not he contributed any prizes or made financial contributions. However, at one point it was discovered that Toppers Pizza was going to be delayed in delivering food for the event. BL sent his son to Costco to purchase 100 hot dogs, in order to feed the attendees who may have wanted to eat earlier, while they waited for the pizza to arrive.
- BL also told KPMG that his level of effort in planning the event was the same in 2023. He noted that the event has gained so much recognition in the community that sponsors have started to reach out to him without solicitation, to support the event. 

Photographs of the 2018 Grandparent’s Day event, as included in the April 27, 2023, presentation related to the application for an audit of Mr. Leduc’s campaign finances

- KPMG shared several photographs from the April 27, 2023, presentation by the applicant for this audit with BL and asked for his comments. The photographs and BL’s comments are included below:

Photograph 1



- BL told KPMG the following, in relation to the above photograph:
 - This photograph is from the 2018 Grandparent’s Day event
 - The photograph is of BL, together with his parents
 - BL is unsure if his parents are holding BL’s election materials in the photograph

2023 is irrelevant to 2022 which is the year of the complaint. Hot dog purchases made were for Westmount Retirement residents only and not for the general public. All prizes were donated.


Photograph 2



- BL told KPMG the following, in relation to the above photograph:
 - This photograph is from the 2018 Grandparent's Day event
 - BL did not provide the election materials held by the individual in the photograph. BL is unsure where the materials came from, but believes they were likely brought to the event by the attendees as an unsolicited show of support.

Photograph 3




- BL told KPMG the following, in relation to the above photograph:
 - The photograph is from the 2018 Grandparent’s Day event.
 - BL is unsure why there is a ‘vote Bill Leduc’ sign in the photograph, or why that sign was at the event. 


Planning the 2022 Grandparent’s Day event

- TR asked BL who planned the 2022 Grandparent’s Day event?
- BL responded that the event was planned by BL, together with the Minnow Lake Community Action Network (“Minnow Lake CAN”). Specifically, Dean Eyre, former Chair of the Minnow Lake CAN was involved in planning the event. BL asked KPMG to speak with Mr. Eyre about the event.
- There is a budget for the event. BL is not aware of the exact amount, but believes it is approximately \$3,000. Some of the funding for the event was provided by the City of Greater Sudbury through the Healthy Community Initiative. A local credit union also donated \$500 to the current year’s event.

- TR asked BL about his responsibilities, with respect to the 2022 Grandparent’s Day event.
- BL told KPMG the following:
 - The format of the Grandparent’s Day event was the same each year that it took place.
 - In 2022, BL was responsible for reaching out to event sponsors and vendors, including: Topper’s Pizza and Hilton Garden Inn and Suites (for food) and grocery stores (for soft drinks). BL also coordinated prizes and games for the event.
 - BL does not have the financial records for the event. He advised KPMG that he believes those reside with Dean Eyre. 

 Number: 1 Author: 232501 Subject: Sticky Note Date: 12/26/2023 7:42:25 PM

Per previous comments provided, Ward 11 residents made a show of support on their own accord, not with campaign materials provided by BL as there were none at the celebration.

 Number: 2 Author: 232501 Subject: Sticky Note Date: 12/26/2023 7:45:07 PM

Sponsors is actually an inaccurate term on BL's part. The companies involved generously supported the celebration of seniors in the community.

Prizes purchased by Mr. Leduc for the 2022 Grandparent's Day event

- TR asked BL about the prizes that he allegedly donated to the event. Specifically, TR noted that included in the documents BL provided to KPMG in relation to this review, there was an invoice for Nathalie's online deals for \$750, dated September 6, 2022.
- BL told KPMG the following:
 - All of the prizes that BL purchased for the 2022 Grandparent's Day event were included on the invoice from Nathalie's Online Deals.
 - BL does not believe the prizes he purchased constitute a campaign expense, and they were donated to the event by him personally, and not as a Councillor.
 - Nathalie's Online Deals is a warehouse. BL stumbled upon the business one day when he was at an appointment.
 - BL is unsure of the nature of the apparent credit or discount on the invoice for \$750.64. From BL's understanding he paid full price for the prizes, which was \$750 including HST, and did not receive a discount or apply a credit.
 - BL paid for the prizes by cheque draw on his campaign finance account, since Nathalie's Online Deals did not accept credit card or debit payments, and he did not have sufficient cash with him at that time. BL did not have any personal cheques, so he used one of the cheques from his campaign account out of necessity.

Other attractions at the 2022 Grandparent's Day event

- TR inquired about other attractions at the Grandparent's Day event, including whether they were donated or purchased.
- BL told KPMG the following:
 - There was food provided which consisted of pizza from Toppers Pizza and chicken wings from Hilton Suites Garden Inn. BL does not recall the cost, but believes all food was paid in full at full price (i.e. no discounts were provided).
 - There was pop provided by Coca Cola and/or local grocers. BL recalls asking for donations for pop, and does not recall if some of the pop was paid for or the amount.
 - There were horse and buggy rides provided by a company called Wagon Wheel Ranch. BL reached out to Wagon Wheel Ranch to hire them for the event. BL does not recall the cost, but they were paid in full, at market rates for services provided.
 - There was live music provided by Rod Basinet, a resident of Ward 11. BL does not recall the cost, but BL believes that Mr. Basinet was paid in full, at market rates for services provided.
 - There was a Police Car, Ambulance and Fire Truck provided by the City of Greater Sudbury, so that children in attendance could view the vehicles and meet the first responders.
 - There was a small 'antique car show'.

Invoice for September 11, 2022, at Hilton Garden Grille

- TR noted that included in the documents BL provided to KPMG in relation to this review, there was an invoice for Hilton Garden Inn, for \$550.00. TR noted that the amount appeared

to have been paid from BL's campaign bank account, and inquired if the invoice was for food at the Grandparent's Day Event. Invoice details indicated that the event was from 6:00 – 8:00 p.m. on September 11, 2022, in the Garden Grille and Bar.

- BL told KPMG the following:
 - The invoice was not for food at the Grandparent's Day event, but was at a separate dinner, for volunteers who supported the Grandparent's Day event.
 - At some point, the Minnow Lake Lions had agreed to volunteer at the 2022 Grandparent's Day event. However, due to a death in their group, the Lions were unable to attend due to a conflict with the late individual's funeral. As a result, BL's campaign team volunteered at the event in their stead.
 - There were approximately 10-12 volunteers at the event in total.
 - Following the event, BL took the volunteers out for dinner. BL believed that this dinner constituted a campaign event since 6-8 of those in attendance at the dinner were members of his campaign team and they discussed his campaign plan at the dinner.
 - After dinner, BL and his team went out to canvass door-to-door, in relation to his election campaign.

Marketing/advertising for the 2022 Grandparent's Day event

- KR asked BL about his approach to create awareness of the 2022 Grandparent's Day event.
- BL told KPMG the following:
 - BL distributed flyers to local gas stations, a confectionary store, restaurants, etc. where people will see them.
 - The Minnow Lake CAN and the Minnow Lake Lions displayed invitations.
 - Invitations were also sent to local school boards and schools.
- KR asked BL if he invited residents to the event, while he was campaigning in the community?
- BL responded that when you campaign door to door, you are trying to get to know the residents and vice versa. It is possible that he would have mentioned the event to older residents, while campaigning.

Additional Information

- TR asked BL if there is any additional information he wants to share with KPMG, in relation to our audit?
- BL told KPMG the following:
 - BL reiterated that the 2022 Grandparent's Day event was not a campaign event.
 - The application for an audit of BL's campaign finances came about as a direct result of the 2022 Grandparent's Day event.
 - If there had been no COVID-19 pandemic, Grandparent's Day would be into its sixth year. This is an event about grandparents and their families.
 - BL was very disappointed to see the applications for an audit of his campaign finances filed. Grandparent's Day event has never been political and it never should. The same is true of the Minnow Lake CAN. They are supposed to support the community.

- When the initial complaint that led to the April 27, 2022, application for an audit of BL's campaign finances was filed with the Clerk's office, photographs were filed. At a later date, the applicant provided a video to the Clerk's office, and was told no more submissions could be accepted but a slide show could be prepared. This is what happened, but the applicant did ultimately also provide the video to the Clerk's office. Grandparent's Day is an event hosted on private property, and BL believes the residents of Westmount retirement residence were violated by that video, since they have a right to privacy.

— Immediately after our discussion, BL sent TR two emails stating the following:

- *"One point I forgot to mention was that Christopher Duninson Hale and his Anastasia had high jacket my website during the election, this is the type of people that we are dealing with."*
- *"The other point I forgot to mention is that the pictures that the complaint submitted is from a third party and not supplied by themselves which can't be verified as credible evidence."*

I confirm that this interview summary document accurately reflects the conversation I had with KPMG representatives, in relation to the ongoing compliance audit of William ("Bill") Leduc's 2022 election campaign finances.

Name

Signature

Date



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

D Appendix D: Detailed invoice for Nathalie's Online Deals

INVOICE #100

Nathalie Grenier

(Nathalie's Online Deals)
428 Westmount Ave unit 1c
Sudbury , Ontario P3A 2C9

ck #34
Paid in full
Nathalie Grenier
Emmy H...

September 6, 2022

BILL TO

[Bill Leduc] Westmount Days
Sudbury Ontario

FOR

Grandparents days

DESCRIPTION	AMOUNT
HS Arctic King 5000 BTU air conditioner	\$75.00
NS Jeep with remote	\$200.00
HS/w123 room comforts tower heater with remote	\$30.00
w kids watch	\$8.00
W discovery black canvas velcro watch	\$13.00
HS 124 pink gaming headset	\$15.00
NS impress steam iron	\$10.00
HS impress oscillating ceramic tower heater	\$35.00
ns01 zero gravity chair	\$35.00
w127/w126 Jack LaLanne power juicer	\$45.00
ladies watch	\$13.00
W toastmaster 1.7 L kettle	\$18.00
ns offset umbrella	\$80.00
w3d horse picture	\$16.00
w/hs73 white cordless telephone	\$12.00
w orange pillow	\$7.00
W orange pillow with pom poms	\$7.00

DESCRIPTION	AMOUNT
HS 108 white foldable headset	\$15.00
HS 75 red foldable headset	\$15.00
W Pro bar HD 200	\$16.00
W 108 1 cup coffee pot	\$15.00
W clock radio x2	\$16.00
w 1 L compact cordless kettle	\$10.00
2x 4pc bathroom set	\$10.00
HS 30 watt class d stereo amplifier	\$30.00
ns gravity 3 speed floor fan	\$30.00
w twin air mattress	\$20.00
w75 ft expandable hose	\$28.00
nb11 web camera	\$14.00
w jewelry box	\$10.00
W light up skipping rope	\$5.00
nb14 avantree stereo Bluetooth headset	\$16.00
selfie shoot and share NS	\$10.00
w102 Ruby Goldberg acrobat challenge	\$10.00
gtech digital amplified w outdoor antenna with remote	\$26.00
W Pro Crystal HD amplified antenna x2	\$32.00
hs147 50 pair shoe rack	\$20.00
Pro bar HD 200 antenna	\$16.00
NB tabletop clock	\$10.00
W Hamilton Beach White 1.7 L kettle	\$18.00
w jewelry box x2	\$20.00
w kids helmet and pads	\$10.00
W jumbo display alarm clock	\$15.00

DESCRIPTION	AMOUNT
w probar hd 200	\$16.00
w blanket quilt	\$18.00
hs focus true wireless earbuds	\$18.00
w ultra Pro stealth HD antenna x3	\$48.00
w watches x6	\$78.00
toastmaster 12-cup coffee maker	\$17.00
orange tent with rip carry bag	\$18.00
kids bubbles and candies	\$5.00
ladies green band watch	\$8.00
w gold and silver watch	\$11.00
HS 16 Hamilton Beach juicer	\$35.00
	SUBTOTAL \$1,328.00
	TAX RATE 13.00%
	OTHER -\$750.64
	TOTAL \$750.00

Make all checks payable to Nathalie Grenier. If you have any questions concerning this invoice, contact [Name], [Phone Number], [Email]

THANK YOU FOR YOUR BUSINESS!



The City of Greater Sudbury

Compliance Audit of Mr. William (Bill) Leduc's 2022 Election Campaign Finances

Report Date: May 24, 2024

E Appendix E: Financial Summary of Grandparent's Day 2022

\$300. Donated by the Minnow Lake Lions.

Our total expenditure was \$2,227. We had funds of \$1800. As noted above, leaving us with a short fall of \$427.45, which was offset with funding from the ML Ward 11 CAN.

Summary of Activities:

HCI Funds \$1,000.	Hilton Suites-Wings	\$550.
	Toppers Pizza-Pizza	445.20
	Rod Bazinet-Music	\$300.
ML Lions (\$300. Donation)		
Minnow Lake Credit Union \$500	Wagon Wheel Ranch: \$932.24	\$932.25
Total Funds: \$1800.	Total Expenditures	\$2,227.45
Balance of \$427.45 covered by ML CAN Ward 11		
Identify any unexpended funds* N/A		

*Unexpended funds must be returned by cheque with a copy of this completed report. Cheque to be made out to: City of Greater Sudbury

Were you able to leverage any other funding/partnerships as a result of this project?
Please explain. x__

__Minnow Lake Credit Union Donation \$500.

Schedule 1									
Invoice Summary - Inventory from previous campaign used in this campaign									
KPMG #	Vendor Name	Invoice Number	Invoice Date	Description	Quantity	Price	Amount (pre tax)	Amount (incl. tax)	KPMG Notes
188	www.DrSigns.net	007457	8/20/2018	48x32 1 sided election signs (regular \$25.34)	50	\$ 19.00	950.00	1,073.50	Large signs
				24x18 election lawn signs (regular \$5.39)	200	\$ 5.00	1,000.00	1,130.00	Small signs
				wire step stakes (regular \$1.50)	200	\$ 1.25	250.00	282.50	
				4.25"x11" door knockers 2-sided x5000	1	\$ 745.00	745.00	841.85	
				8.5x11 folded brochure x2500	1	\$ 376.25	376.25	425.16	
				business cards x1000	1	\$ -	-	-	
				<i>Invoice Subtotal</i>			3,321.25	3,753.01	
189	www.DrSigns.net	007458	8/20/2018	48x32 lawn signs 1 sided (regular 47.33each)	3	\$ 25.00	75.00	84.75	Large signs
				<i>Invoice Subtotal</i>			75.00	84.75	
190	www.DrSigns.net	007459	8/20/2018	design fee for brochure!	1	\$ 125.00	125.00	141.25	
				<i>Invoice Subtotal</i>			125.00	141.25	
191	www.DrSigns.net	007480	9/4/2018	24x18 2-sided election lawn signs (regular \$7.40)	100	\$ 6.50	650.00	734.50	Small signs
				5% prepay discount	1	\$ (32.50)	(32.50)	(36.73)	Small signs
				<i>Invoice Subtotal</i>			617.50	697.78	
192	www.DrSigns.net	007507	9/7/2018	wire step stakes	100	\$ 1.50	150.00	169.50	
				<i>Invoice Subtotal</i>			150.00	169.50	
193	www.DrSigns.net	007510	9/10/2018	48x32 lawn signs 1 sided	2	\$ 25.00	50.00	56.50	Large signs
				<i>Invoice Subtotal</i>			50.00	56.50	
194	www.DrSigns.net	007537	9/21/2018	2 sided 24x18 election lawn signs	75	\$ 6.18	463.50	523.76	Small signs
				48x32 election lawn signs	2	\$ 25.00	50.00	56.50	Large signs
				wire step stakes	9	\$ 1.50	13.50	15.26	
				<i>Invoice Subtotal</i>			527.00	595.51	
195	www.DrSigns.net	007560	9/27/2018	2 sided 24x18 election lawn signs	50	\$ 6.18	309.00	349.17	Small signs
				<i>Invoice Subtotal</i>			309.00	349.17	
196	www.DrSigns.net	007564	10/2/2018	wire step stakes	2	\$ 1.50	3.00	3.39	
				<i>Invoice Subtotal</i>			3.00	3.39	
197	www.DrSigns.net	007566	10/4/2018	48x32 lawn signs 1 sided (regular 47.33each)	4	\$ 25.00	100.00	113.00	Large signs
				<i>Invoice Subtotal</i>			100.00	113.00	
198	www.DrSigns.net	007567	10/4/2018	48x32 lawn signs 1 sided	3	\$ 25.00	75.00	84.75	Large signs
				24x18 lawn signs 2 sided	4	\$ 6.18	24.72	27.93	Small signs
				wire step stakes	4	\$ 1.50	6.00	6.78	
				<i>Invoice Subtotal</i>			105.72	119.46	
199	www.DrSigns.net	007569	10/5/2018	48x32 lawn signs 1 sided	2	\$ 25.00	50.00	56.50	Large signs
				<i>Invoice Subtotal</i>			50.00	56.50	

Schedule 1									
Invoice Summary - Inventory from previous campaign used in this campaign									
KPMG #	Vendor Name	Invoice Number	Invoice Date	Description	Quantity	Price	Amount (pre tax)	Amount (incl. tax)	KPMG Notes
200	www.DrSigns.net	007571	10/9/2018	48x32 lawn signs 1 sided	3	\$ 25.00	75.00	84.75	Large signs
				24x18 lawn signs 2 sided	10	\$ 6.18	61.80	69.83	Small signs
				<i>Invoice Subtotal</i>				136.80	154.58
201	www.DrSigns.net	007572	10/10/2018	48x32 lawn signs 1 sided	2	\$ 25.00	50.00	56.50	Large signs
				<i>Invoice Subtotal</i>				50.00	56.50
Total Invoices							\$ 5,620.27	\$ 6,350.91	
Large Signs Total					71		1,475.00	1,666.75	
Small Signs Total					439		2,476.52	2,798.47	
Signs Total					510		\$ 3,951.52	\$ 4,465.22	
As per Table 2 of Form 4									
20	Doc Signs		7/31/2018	Large Signs	30			1,692.60	
20	Doc Signs		7/31/2018	Small Signs	110			1,815.00	
Total					140			\$ 3,507.60	

Schedule 2

Summary of Adjustments to the Form 4 for apparent contraventions of the MEA with respect to Grandparent's Day 2022

		Volunteer Dinner	Beverages	Topper's Pizza	Hilton Garden Grille	Wagon Wheel Ranch	Rod Bazinet	Nathalie's Online Deals	Total
KPMG Report Ref.	Appendix B	5.2.5.1	5.2.7.1	5.2.7.2	5.2.7.3	5.2.7.4	5.2.7.5	5.2.7.6	
Contributions									
Contributions in goods and services from candidate and spouse	\$ 3,507.60	-	-	-	-	-	-	750.00	4,257.60
Total value of contributions exceeding \$100 per contributor	14,050.00	-	-	-	-	-	-	-	14,050.00
Total amount of contributions	17,557.60	-	-	-	-	-	-	750.00	18,307.60
Expenses subject to general spending limit									
Inventory from previous campaign used in this campaign	3,507.60	-	-	-	-	-	-	-	3,507.60
Advertising	6,985.79	-	-	-	-	-	-	-	6,985.79
Brochures/flyers	655.51	-	-	-	-	-	-	-	655.51
Signs (including sign deposit)	1,699.31	-	-	-	-	-	-	-	1,699.31
Meetings hosted	1,067.28	82.18	-	-	-	-	-	-	1,149.46
Office expenses incurred until voting day	101.61	-	-	-	-	-	-	-	101.61
Other (Grandparent's Day 2022)	-	-	-	548.20	467.82	932.25	300.00	750.00	2,998.27
Total expenses subject to general spending limit	\$ 14,017.10	82.18	-	548.20	467.82	932.25	300.00	750.00	17,097.55
General Spending Limit									14,159.60
Expense amount apparently in excess of the General Spending Limit									\$ 2,937.95