

4.1.1 - Applicant Additional Written Submission

July 24, 2023

Attn: Municipal Elections Compliance Audit Committee

Dear Committee Members,

I am writing to provide additional information in support of my request for a compliance audit, as an extension to my previous submission dated June 29th, 2023.

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

1. Expenses subject to general spending limit

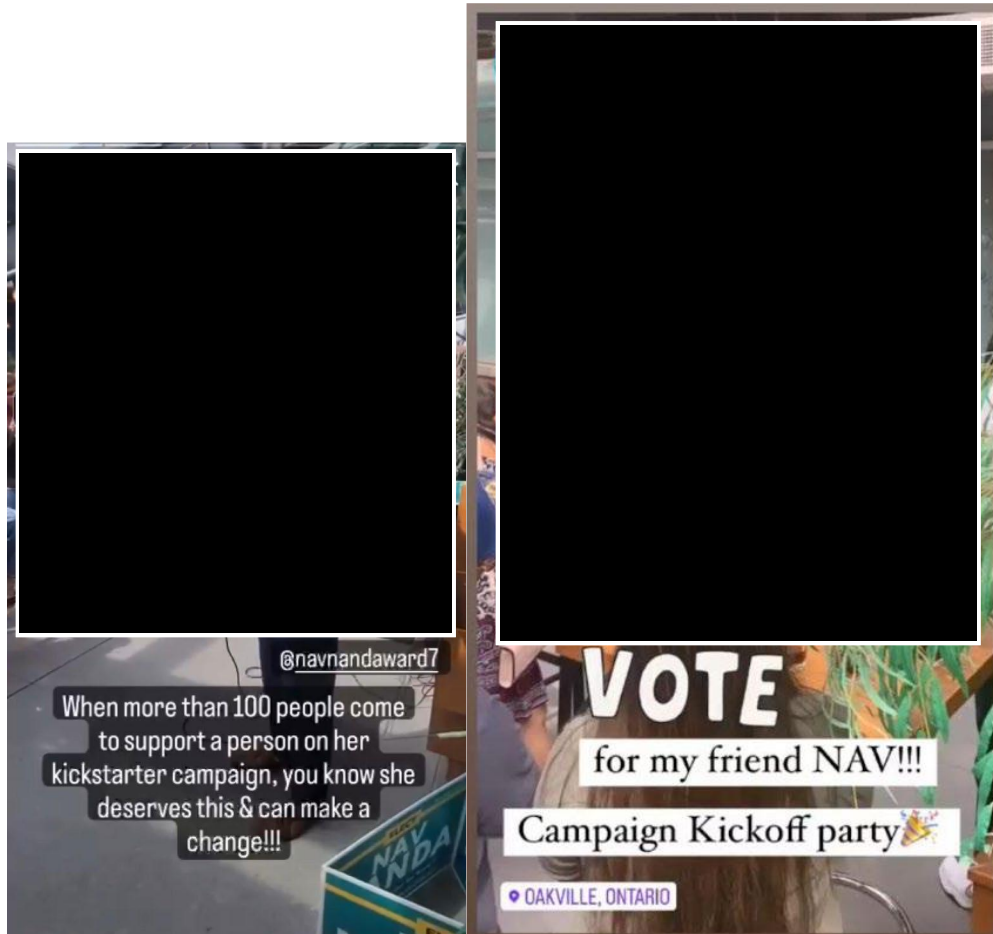
| | | |
|---|-------------|---------------------|
| Inventory from previous campaign used in this campaign (list details in Table 2 of Schedule 1) | + \$ | |
| Advertising | + \$ | 864.54 |
| Brochures/flyers | + \$ | 5,387.34 |
| Signs (including sign deposit) | + \$ | 6,816.36 |
| Meetings hosted | + \$ | |
| Office expenses incurred until voting day | + \$ | 69.50 |
| Phone and/or internet expenses incurred until voting day | + \$ | |
| Salaries, benefits, honoraria, professional fees incurred until voting day | + \$ | |
| Bank charges incurred until voting day | + \$ | 15.80 |
| Interest charged on loan until voting day | + \$ | |
| Other (provide full details) | | |
| 1. _____ | + \$ | |
| 2. _____ | + \$ | |
| 3. _____ | + \$ | |
| 4. _____ | + \$ | |
| 5. _____ | + \$ | |
| 6. _____ | + \$ | |
| Total Expenses subject to general spending limit | = \$ | 13,153.54 C2 |

Expenses Submitted:

Upon reviewing Ms. Nanda's audited financial statements submitted on March 24, 2023, it is evident that she did not claim any expenses for **phone and internet charges** or for **meetings hosted**. However, it appears that most of her campaign expenses are recorded under **brochures/flyers and signs**, with minimal allocation to **advertising**. In light of this, I would like to present the following information, which sheds light on Ms. Nanda's campaign expenditures and raises concerns regarding their accuracy and completeness.

1. Campaign Kick Off Event - September 18, 2022, Boston Pizza North Oakville

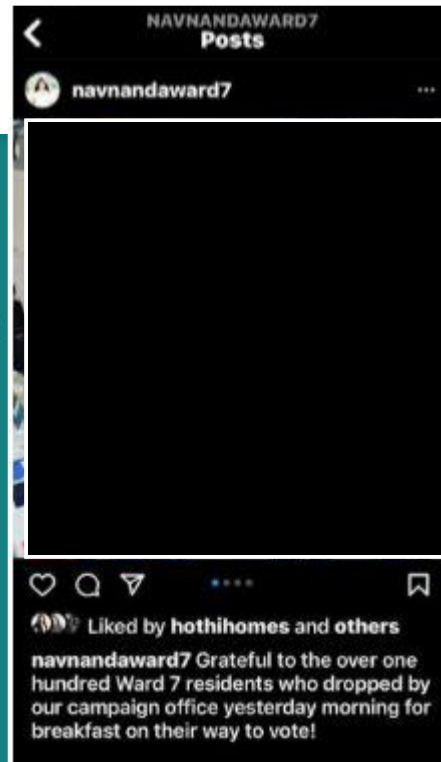
In my earlier submission, I mentioned an approximate attendance of 60 people at this event. However, I stand corrected, as information in the above picture suggests that over 100 people attended the campaign kick-off event at Boston Pizza North Oakville. To verify this claim, I personally contacted Boston Pizza, and they confirmed that large groups like this are expected to make reasonable purchases. For groups of this size, only one bill is allowed, which further emphasizes the scale of the event. Furthermore, I have included an additional image that clearly shows beverages being consumed.



2. Meeting #2 - "Join us for a Breakfast & Vote" - Sat October 8 2022

I would like to submit that the invitation to the breakfast meeting highlights the phrase 'Bring your appetite,' and also mentions that refreshments and snacks will be served. Ms. Nanda subsequently posted that over 100 people attended, and furthermore, the picture shows an individual holding a plate. The issue that raises concern is the fact that **Ms. Nanda deleted the posts from her social media pages after they were initially shared.** This makes it appear as

though there is a concerted effort to hide these posts, possibly because she had not reported the expenses mentioned in the posts.



3. Campaign Manager Expenses

Ms. Nanda had a campaign manager, Shayan D. Hayder, working on her campaign. Surprisingly, no **salaries/benefits/professional fees/honorariums** were reported in Ms. Nanda's financial statements. This raises questions about the accuracy of the financial reporting.

Moreover, during the period from May 2022 to October 2022, when Mr. Hayder served as the designated campaign manager - it is reasonable to assume that as a campaign manager, he would have required access to phone and internet services at the very least to carry out his important role. Strangely, no expenses related to **Phone & Internet** were reported, further casting doubt on the completeness of the financial disclosures.

In addition, I have attached relevant posts from the Oakville Beaver and Facebook that highlight the role of the campaign manager in Ms. Nanda's team.

19°C | Thursday Jul 20 insideHalton.com

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NEWS

Youth hopeful as voter turnout drops in Oakville and Burlington as well as Milton and Halton Hills

Young people may hold key to stronger voter engagement

By Bambang Sadewo InsideHalton.com
Monday, October 31, 2022 | 2 min to read

f t e p l



This sentiment was echoed by Shyan Hayder, who, at just 17, managed the campaign of Nav Nanda for Ward 7 town and regional councillor in Oakville — and helped her defeat the incumbent by more than 500 votes.

The Grade 12 student at White Oaks Secondary School has been involved in election campaigns at all levels for years. With many of his peers finding politics boring, he said, having more young candidates and volunteers would motivate them to be more involved in politics and local issues.

"You have to create a chain," he said. "That's how it starts."


Those who could pave the way include two councillors-elect from Milton and Halton Hills, Adil Khalqi, 22, and Joseph Racinsky, 20.


Khalqi said that he's committed to "ensuring that young people have the ability to be part of institutions and organizations that shape long-term decision-making, and are in charge of serving the community."

"Being a young person would add value to council and fill in a perspective that is not too common in council. Diverse representation matters," he said.

While admitting that his age came up on occasion during the election campaign, Racinsky felt his passion likely struck a chord with some voters.

"If they wanted someone with energy and enthusiasm, that's why people voted for me. If age was a concern, they probably didn't," he said.

 **Ibrahim Daniyal**
October 31, 2022 · 🌐

My son  Shyan D. Hayder ,17, managed a very successful campaign as Campaign Manager [Nav Nanda](#) Regional Councillor Oakville. He has been recognized by [insidehalton.com](#) an online version of Oakville Beaver. Bravo!!

"This sentiment was echoed by Shyan Hayder, who, at just 17, managed the campaign of Nav Nanda for Ward 7 town and regional councillor in Oakville — and helped her defeat the incumbent by more than 500 votes.

The Grade 12 student at White Oaks Secondary School has been involved in election campaigns at all levels for years. With many of his peers finding politics boring, he said, having more young candidates and volunteers would motivate them to be more involved in politics and local issues.

"You have to create a chain," he said. "That's how it starts.""

<https://www.insidehalton.com/.../10750669-youth-hopeful.../>

Link to article: https://www.insidehalton.com/news/youth-hopeful-as-voter-turnout-drops-in-oakville-and-burlington-as-well-as-milton-and/article_c25351ed-9bf2-58fe-b2cd-f088bd35824a.html

The article and the statement from Ibrahim Daniyal, makes no mention of this being a volunteer position, furthermore a campaign manager position is a full-time role.

4. Internet and Phone Expenses

Ms. Nanda's campaign adopted a robust social media strategy, which is common and effective in engaging with the community, especially one with a younger population. Evidence from various online community groups, such as "North Oakville Ward 7 Residents Association" and "The Preserve North & East Oakville", demonstrates that Ms. Nanda actively ran her campaign on social media platforms like Facebook, WhatsApp, Instagram. However, despite the clear usage of phone and internet for campaigning purposes, no corresponding expenses were reported.

I have attached screenshots of some of these social media posts as evidence:

NOW 7 Facebook Group Post. North Oakville Ward & residents association, is a community resident association and also has an active facebook group. At the time, Ms. Nanda was the president of this group and actively posted her campaign material as depicted below.

a)

North Oakville Ward 7 Residents Association (NOW7)
Admin Nav Nanda · Oct 17, 2022 · 🌐

Nav Nanda will represent you, not the Developers!

One of the most consistent concerns heard from your neighbours has been the poor planning that went into planning and development approval on your street, and how it has limited parking access, created significant congestion, and decreased your quality of life in Ward 7.

Our current councillors' approach has been to approve every project proposal put forward by developers. They have never voted against a proposed development in Ward 7, even when residents have raised concerns that a proposal does not incorporate the best interests of current and future residents, and include adequate land and services for schools, commercial complexes, community parks, transit, and parking. Instead, residents have been locked out of meetings held between the Town of Oakville and developers, and elected officials have told us to move if the parking restrictions, congestion, and other concerns bother us.

I am running to be your next Regional Councillor to represent your interests at Town Hall and not the interests of developers. We need to adopt a sustainable approach to development that ensures there is adequate infrastructure and supports to accommodate new projects, rather than making decisions that contribute to the congestion or safety issues our families currently face due to poor planning decisions. Sometimes, that means saying no, and asking developers and town officials to make plans that better reflect our community's interests.

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This is my commitment to you: I will be a Regional Councillor who will actually be our voice to Town Hall and not the voice of developers and the Town of Oakville to Ward 7.

Thank you,
Nav Nanda
Regional Councillor Candidate Ward 7
[#votenvandaward7](#)


NAV NANDA
A REGIONAL COUNCILLOR THAT REPRESENTS YOU.
NOT DEVELOPER

Our councillors have never voted against any development project in Ward 7.

They even supported the projects on Carding M Trail and North Park that have restricted parking access and caused major congestion in our neighborhood.

We need change. I promise to represent you, not developers, as your Regional Councillor.

ON OCTOBER 24,
ELECT NAV NANDA AS YOUR
REGIONAL & TOWN COUNCILLOR
FOR OAKVILLE WARD 7

 **North Oakville Ward 7 Residents Association (NOW7)** ...
 Admin Nav Nanda · Oct 9, 2022 · 📍

My commitment to the families and children of Ward 7.

We need more schools and better community infrastructure for our families, especially in Upper Oaks and Joshua Meadows.

ELECT NAV NANDA
 Honesty | Integrity | Transparency

My Commitment to the Families of Ward 7

My name is Nav Nanda, and I am running to be your next Regional Councillor for Ward 7. Since 2015, I have served as the Chair of the Odenawi Public School's Parent Council. I decided to run for this position because I had four children attending schools in Ward 7 and I wanted them and all other children in our community to have the best opportunity to develop and achieve their highest potential. My goal was to provide the children in Ward 7 the ability to thrive and become the best versions of themselves.

Immediately, we faced challenges. Our schools, though new, could not accommodate the influx of children in our neighbourhood. Ward 7 was growing at a significant rate but our elected officials did not match that growth with investment in community infrastructure, including schools.

My job moved from organizing book fairs to lobbying various levels of government for funding to build new schools and provide better educational infrastructure and services to our children. I helped organize parents to demand that our elected officials invest back in our communities to ensure our children were not relegated to learning in portables and crowded classrooms.

After years of advocacy, I helped secure funding to construct and operate five new schools in Ward 7. This investment will transform North Oakville and the opportunities of our children and community for generations to come.

But, more needs to be done. Ward 7 needs a partner at Town Hall who understands the needs of our families, how to address critical educational infrastructure and service gaps, and what we can do ensure our children reach their highest potential.

My promise to you is that I will champion your interests at Town Hall. I will work hard to ensure that our families and children are put first, and that North Oakville receives the attention and investment it deserves.

That is my commitment to you.


Sincerely,

Nav Nanda
 navnanda.ca
 905-617-6287

Advanced Voting Continues This Week:


October 9 – 10 AM to 5 PM
 October 11 – 10 AM to 6 PM
 October 12 – 10 AM to 8 PM
 October 13 and 14 – 10 AM to 6 PM
 October 14 – 10 AM to 5 PM

Election Day is October 24, 2022

 **Nav Nanda**
 October 18, 2022 · 📍



Since 2015, I have served as the Chair of Odenawi Public School's Parent Council. I did so because I have four children who I hoped would attend public schools in Ward 7, and I wanted to give them and all other children in our community the best opportunity to learn and achieve their highest potential.



However, immediately after assuming my position, it became clear that the Town of Oakville failed to plan and invest in community infrastructure that would ensure there were... [See more](#)



Ward 7 needs a partner at Town Hall who understands the needs of our families, how to address critical educational infrastructure and service gaps, and what we can do ensure our children reach their highest potential.

ON OCTOBER 24, ELECT NAV NANDA AS YOUR REGIONAL & TOWN COUNCILOR FOR OAKVILLE WARD 7

  Anu Malhi-Singhal, Navjot Hothi and 20 others 2 comments

 Like  Send

c)

Ms. Nanda also recorded and posted several videos from a phone, which would require mobile connectivity



Considering the extent of social media engagement, even if Ms. Nanda utilized her home internet and personal Wi-Fi, it would be reasonable to expect a fraction of those expenses to be allocated towards her campaign costs, which can be noted across several other candidate financial statements.

5. Discrepancy in “Advertising Costs”

Ms. Nanda's reported **advertising cost** of \$864.44 appears significantly low, especially considering the fact that she had the following expenses related to her website and promotional video:

1. A full website constructed, which would cost anywhere between \$800-\$1500. Usually, when using customer relationship management software like Nationbuilder, the cost tends to be on the higher end.
2. Nationbuilder software pricing can cost up to \$160 **USD**/month or more with custom plans, depending on the number of contacts in your system. Ms. Nanda delivered her first literature piece the first week of June 2023, referring voters to her website. Therefore her website cost should be reflected for 5 months.

3. The creation of a professional election video, which involves costs for production, editing, and promotion.

Based on the information provided below, Ms. Nanda's advertising costs do not seem to reflect the extensive work and expenses that went into her website operations, nor do they account for the costs associated with creating, editing, and posting an election promotional video.

Please see below Ms. Nanda's landing page, the date has been screenshotted as 11/11/22. Furthermore, the complexity of the customer relationship management software is indicated on the contact page, where it states "Sign in with Facebook/Twitter/Email - created with Nationbuilder."

Nationbuilder software utilizes voter data, such as names, addresses, and other information, including previous voting records for political campaigns, to allow users to centralize, build, and manage campaigns by integrating various communication tools like websites, newsletters, text messaging, and social media channels under one platform.

It is widely understood that utilizing a Nationbuilder website requires the assistance of a website developer. In fact, Nationbuilder provides a link on their website referring users to Nationbuilder developers who can assist with their projects due to the complex nature of the CRM and software

For further reference, you can find Nationbuilder developers to help with your project at: <https://www.nationbuilder.partners/directory>.



Vote For Nav on Monday, Oct 24, 2022

Meet Nav

Nav Nanda - Oakville Ward 7 Election Campaign Video



Nav was born and raised in Toronto, and has spent more than a decade in the healthcare industry. Since moving to Oakville in 2006, Nav has been a dedicated member of our community, serving as the President of the North Oakville Ward 7 Residents' Association, Co-Chair of the Odenawi Public School Council, Past Vice Chair of We Love Oakville, and Member of the Ontario Honours and Awards Advisory Committee.

Nav has been recognized for advocacy in delivering for North Oakville, including helping to secure funding to construct and operate five new schools in Ward 7. After a surge in thefts and break-ins, Nav established Ward 7's community watch program, and has hosted regular sessions between members of the Halton Police and residents to ensure safety and crime issues are addressed. Nav has also intervened in development and other community issues on behalf of Ward 7 residents, including the Town of Oakville's decision authorize Loyalist Trail as an accessway for transporting large wares and hazardous materials to an industrial site located north of Ivy Rouge.

Nav is the champion that our community needs to represent and fight for the interests of North Oakville.

<https://www.youtube.com/watch?v=8cjkRczEkvI&t=19s> link to video, which was posted across all social media pages

Contact

Contact us

First Name*

Last Name*

Email*

Mobile phone

Send me email updates

Send me text messages

Address (Street, City, State, Zip)

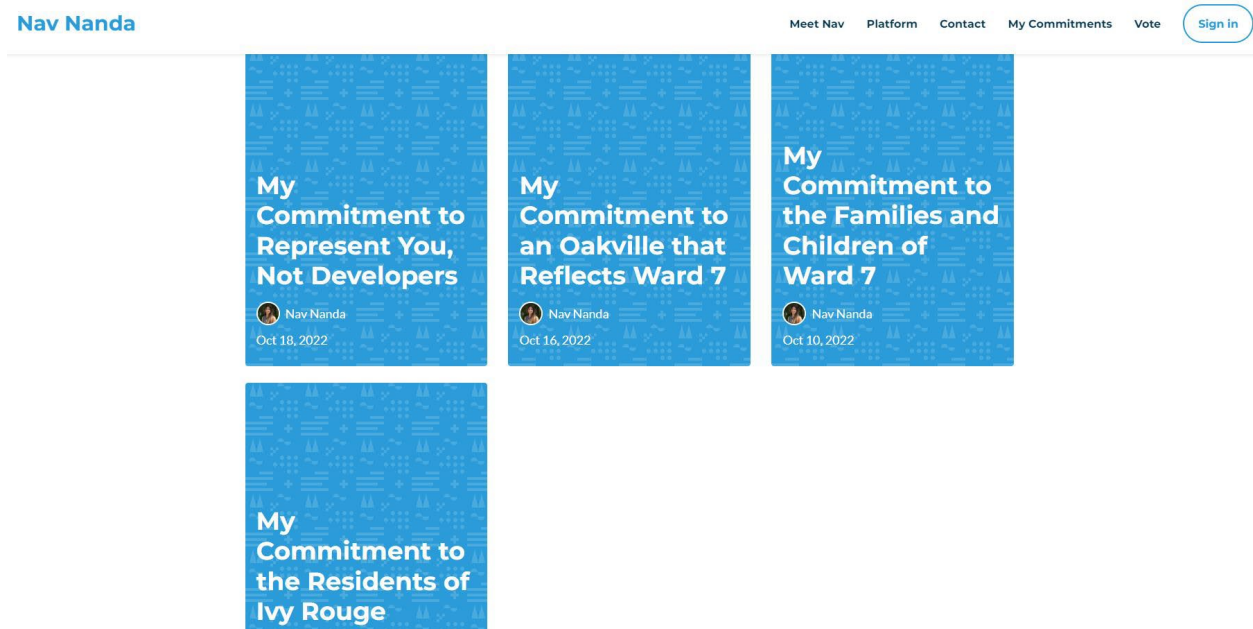
Send message

Nav Nanda

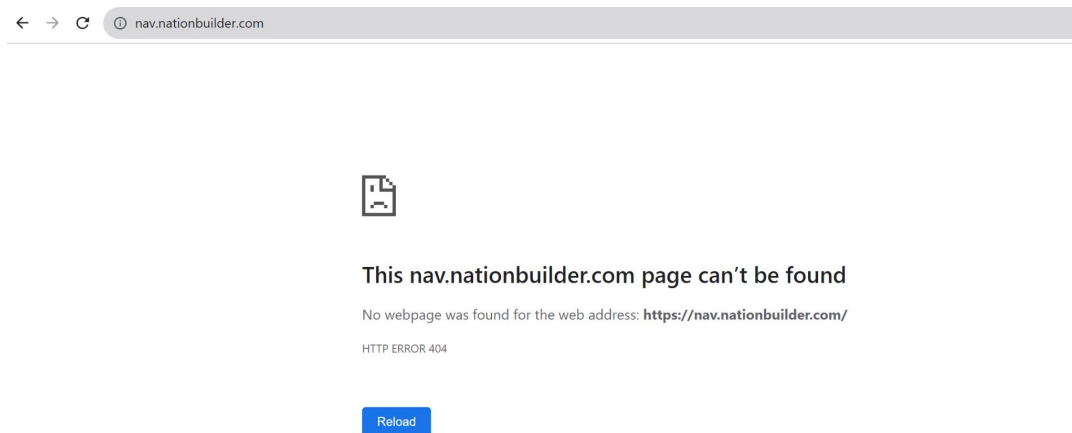
 Canada

Sign in with [Facebook](#), [Twitter](#) or [email](#).
Created with [NationBuilder](#)

Platform pages, showing use of CRM software below as indicated through “Sign in” feature



At present day the website has been taken down, but if you visit www.navnanda.ca you will receive a confirmation that it was indeed a nationbuilder account



Nation Builder Pricing:

NationBuilder

Software ▾ For ▾ Community ▾ Stories ▾ Pricing

Start your free trial

Pricing

Flexible plans to fit every mission

Whether you're just getting started or scaling your organization, we have customizable plans that are right for you.

Monthly Billing Annual Billing

Starter
\$34/mo
Get your idea off the ground with this essential starter kit
0-500 contacts
Start your free trial
What's included:
✓ Integrated people database

Pro
\$160/mo
Equip your team with world-class features you can add on as you need
0-500 contacts
Start your free trial
Everything in Starter, plus:
✓ Integrated people database

Enterprise
Custom
Our most powerful plan, all inclusive, and built for scale
Chat to sales
Learn more
Everything in Pro, plus:
✓ Custom database capacity and

NBot
Hey there!

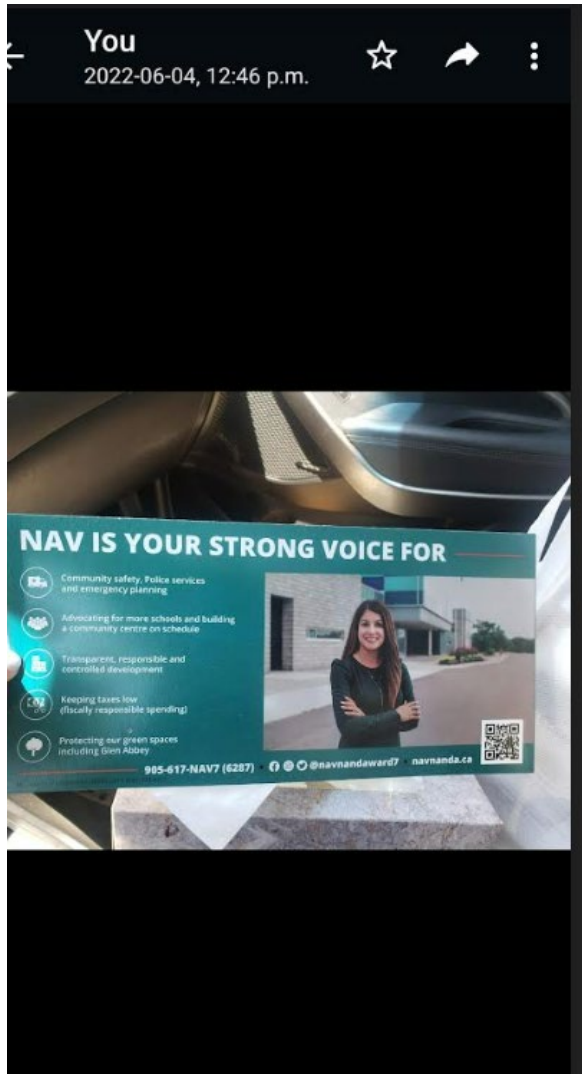
Nationbuilder pricing plan:

https://nationbuilder.com/pricing?utm_source=google&utm_medium=cpc&utm_campaign=sitelinks&utm_content=pricing&recruiter_id=852962&qad=1&qclid=Cj0KCQjw2eilBhCCARIsAG0Pf8sV51wnal8pQN_Ry8t5MZiF4iW0Jyb7FMAOTcQyBVoWlIivvh-sci3MaAtNVEALw_wcB

6. First Literature piece

The following literature piece is date stamped for June 4 2022, and proves the following:

1. Ms. Nanda's robust social media strategy which would require the use of internet, all of her handles are displayed, but she did not report any internet expenses
2. Ms. Nanda's website was live as of June 2022 and maintained active up to and after the election
3. Ms. Nanda used a phone during her campaign, offering her number for voters to reach her on, but not reporting any phone expenses



Conclusion:

In light of the above information, I respectfully request a compliance audit to ensure the integrity of municipal campaigns and to ensure that Ms. Nanda accurately reported her expenses. It is imperative that shortcuts are not taken in the reporting process, and that transparency is upheld throughout.

I kindly request a compliance audit to understand where Ms. Nanda reported costs related to the following line items:

- meetings hosted
 - i) campaign kick off event - September 18 2022- Boston Pizza - 100 + people
 - ii) "Join us for a breakfast & vote" - October 8 2022 - Nanda Campaign office - 100+ people
- salaires/benefits/honoria/professional fees incurred until voting day

- i) campaign manager salary
- phone and internet expenses
 - i) campaign related social media posts internet usage
 - ii) campaign phone costs 905-617-NAV7 as listed on campaign material
 - ii) campaign manager access to phone and internet
- advertising expenses
 - i) website creating
 - ii) nation builder
 - iii) video creation

As someone who has cherished Oakville as my home for a lifetime, it deeply saddened me to witness the lack of transparency and disregard for democracy shown in Ms. Nanda's financial report. Our town is a nurturing community, where honesty and integrity have always been paramount values.

The very foundation of a thriving town lies in the trust between its residents and elected representatives. We must hold our leaders to the highest standards of accountability, ensuring that they serve with honesty and openness. I wholeheartedly believe that the Compliance Audit Committee will carry out a diligent and impartial review of the information provided, upholding the principles that make our town a cherished place for us all. Thank you.

Sincerely,

Gobinder Randhawa