

Findings and Decisions Regarding Investigations Completed in 2019

Dates (Note 1)	Contributor	Recipient	Circumstances (Note 2)	Direct Contribution Amount (Note 3)	Penalty issued by CEO to the Contributor (Note 4)	Return of Contribution by the Recipient (Note 5)
<p>Commenced: May 30, 2018</p> <p>Concluded: April 26, 2019</p>	<p>Sorbie Holdings Inc. and Costa Grigoriadis</p>	<p>The Wildrose Party</p>	<p>Contravention of section 35(1)(a) of the EFCDA. The Wildrose Party accepted a \$100 prohibited contribution from Costa Grigoriadis, non-resident individual, and \$100 from Sorbie Holdings Inc., a prohibited corporation.</p>	<p>\$200</p>	<p>Letters of Reprimand to each contributor.</p> <p>An administrative penalty in the amount of \$750 was issued against the Party.</p>	<p>An order to return the \$200 in prohibited contributions was made. The Wildrose Party cooperated and complied with the order.</p> <p>An administrative penalty in the amount of \$750 was imposed against the Party. Penalty amount paid October 1, 2019 from cheque dated September 9, 2019.</p> <p>This information is posted in accordance with section 5.2(3)(a).</p>
<p>Commenced: June 01, 2018</p> <p>Concluded: April 26, 2019</p>	<p>Paul Hart Doug Earle Guy Barclay Janet Cordes Steve Sibbeston</p> <p>Terra Firma Financial Inc. Richard A R Dear Prof. Corp. Sultan Management Group (SMG)</p>	<p>United Conservative Party of Alberta (UCP)</p>	<p>Contravention of section 35(1)(a) of the EFCDA. The UCP accepted 8 prohibited contributions from 5 individuals not ordinarily resident in Alberta and 3 corporations, as follows:</p> <p>Paul Hart.....\$30 Doug Earle.....\$20 Guy Barclay.....\$300 Janet Cordes.....\$100 Steve Sibbeston.....\$100</p> <p>Terra Firma Financial Inc.....\$200 Richard A R Dear Prof. Corp.....\$100 Sultan Management Group SMG).....\$20</p>	<p>\$870</p>	<p>Letters of Reprimand to each contributor.</p>	<p>An order to return the \$870 in prohibited contributions was made. The UCP cooperated and complied with the order.</p> <p>An administrative penalty against the UCP in the amount of \$870 was imposed.</p> <p>Penalty amount paid October 4, 2019.</p> <p>This information is posted in accordance with section 5.2(3)(a).</p>
<p>Commenced: November 2017</p> <p>Concluded: June 2019</p>	<p>N/A</p>	<p>N/A</p>	<p>Alan Hallman, campaign manager for the Jason Kenney, UCP Candidate Campaign, obstructed an investigation undertaken by Elections Alberta in November 2017 during the Calgary-Lougheed By-election.</p>	<p>N/A</p>	<p>An administrative penalty in the amount of \$1,500 was issued to Alan Hallman, due July 26/19. An Appeal was filed with Court of Queen's Bench. On Nov 13/19, Justice Kirker dismissed the Appeal and found the process followed was procedurally fair and reasonable.</p>	<p>Administrative penalty issued is outstanding.</p> <p>This information is posted in accordance with section 5.2(3)(a).</p>

Note 1:

Dates shown refer to the commencement and conclusion of the investigation.

The date commenced will reflect the date shown on the initial complaint, if the investigation was initiated by an external source. If the investigation was initiated by the Chief Electoral Officer, the date the decision was made to investigate will appear.

If an allegation regarding an excessive or prohibited contribution is founded, an investigation is commenced to determine whether the recipient violated the EFCDA. In this case, the date concluded will reflect the date that the investigation into the recipient's acceptance of the contribution was completed and appropriate notice was provided to those involved.

If an allegation is unfounded, the date concluded will reflect the date that appropriate notice was provided to those involved.

Note 2:

Disclosure is limited, by law, to violations that occurred on or after December 10, 2009. Results of investigations of alleged violations that occurred prior to that date cannot be disclosed, in accordance with the confidentiality provisions of the *Election Finances and Contributions Disclosure Act* (the Act).

Section references refer to the *Election Finances and Contributions Disclosure Act* (the Act).

Note 3:

*Section 23 of the Act prescribes that if the individual charge for a ticket to a fundraising function is more than \$50, the expense portion is \$25 and the balance is deemed to be a contribution (*effective to December 31, 2012*).

Note 4:

Several criteria were considered in the assessment of penalties, including:

- Materiality/severity
- Number of violations
- Cooperation/self-reporting
- Due diligence/policies established to ensure compliance

Note 5:

Effective April 22, 2010, the Chief Electoral Officer had statutory authority to order a political entity to return prohibited contributions to the contributor, in accordance with section 51.1 of the Act. Prior to that, the political entity was advised to consider the voluntary return of a prohibited contribution.

An order is made when it is determined that a prohibited corporation made a contribution in violation of the Act. An order does not indicate any finding of statutory violation on the part of the political entity by the Chief Electoral Officer.

This information is updated to reflect contributions that have been returned.