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From: Pina Martino <[martinocampaign@gmail.com](mailto:martinocampaign@gmail.com)>

Date: Fri, Nov 18, 2016 at 7:21 PM

Subject: Etobicoke Centre Progressive Conservative Party of Ontario Nomination Meeting

To: Mike Richmond <[mike.richmond@mcmillan.ca](mailto:mike.richmond@mcmillan.ca)>Cc: Geoffrey Janoscik <[gjanoscik@pallettvalle.com](mailto:gjanoscik@pallettvalle.com)>

Mike,

I have copied my counsel on this email.

I confirm receipt of your text message sent to my cell phone number at 5:03 pm today.

The format and parameters of the meeting you are proposing for Sunday evening are unprecedented. You have indicated that while I am not required to attend, you propose for the first time to advise me or my representative of the "complaint" brought against me by Kinga Surma, and to invite my response. The manner in which you propose to conduct the meeting is unacceptable as only I can answer these as yet unknown allegations. This would necessitate me appearing in person. As you were advised during my telephone conversation with you at 1:20 this afternoon, I have been subject to attempts to intimidate me by Doug Ford including him following me home after I had attended to personal business at 22 Division of the Toronto Police Service today. Further, he waited in the vicinity of my home and followed me a second time as I attended to other business. It is unacceptable that I be put in a position of having to respond in person to allegations that I do not know, and to have to do so in the presence of the very persons who are making those allegations and attempting to intimidate me.

In any event, your proposal misses the point. Through counsel, I have provided the party with substantial and credible evidence of discreditable conduct on the part of Kinga Surma. It is the mandate and responsibility of the PNC to consider my complaint and, once it is substantiated, to disqualify Ms. Surma as a nomination candidate. That does not require a meeting with both parties present, as this is not a situation that can be mediated. There is no reason that I and Ms. Surma need be in the same room prior to Monday's scheduled nomination meeting.

I maintain my position as set out in my counsel's letter to you sent earlier today.

Pina Martino

[www.pinamartino.com](http://www.pinamartino.com)[647-968-4866](tel:647-968-4866)

Dina Martino

Geoffrey Janoscik  
E-mail: [gjanoscik@pallettvalo.com](mailto:gjanoscik@pallettvalo.com)  
Direct Line: (905) 273-3022 x. 232

November 18, 2016

Progressive Conservative Party of Ontario  
Provincial Nomination Committee  
**Attention: Rick Dykstra, Chair, President of the  
Progressive Conservative Party of Ontario**  
59 Adelaide Street East, 4th Floor  
Toronto, Ontario  
M5C 1K6

***VIA EMAIL [rick.dykstra@ontariopc.com](mailto:rick.dykstra@ontariopc.com)  
and PERSONAL DELIVERY***

Progressive Conservative Party of Ontario  
Provincial Nomination Committee  
**Attention: Bob Stanley, Executive Director of the  
Progressive Conservative Party of Ontario**  
59 Adelaide Street East, 4th Floor  
Toronto, Ontario  
M5C 1K6

***VIA EMAIL [bob.stanley@ontariopc.com](mailto:bob.stanley@ontariopc.com)  
and PERSONAL DELIVERY***

Dear Sirs:

**Re: Etobicoke Centre Progressive Conservative Party of Ontario Nomination Meeting**

We are counsel to Pina Martino, a Qualified Contestant for the Progressive Conservative Party of Ontario nomination in the riding of Etobicoke Centre.

Ms. Martino has uncovered substantial evidence of unethical conduct by another Qualified Candidate, Kinga Surma ("Surma"). Specifically, that Surma submitted memberships for registration in the Provincial Party Membership Registry in which the applicant had not paid the applicable membership fee from their own funds or those of an immediate family member residing in the same household in violation of Rule 4.2.8 of the Progressive Conservative Party of Ontario Rules Governing the Provincial Membership Registry (the "Membership Rules") and/or did not sign the membership form themselves.

Appended hereto are the following evidentiary records detailing numerous instances of said non-compliance, namely:

- (a) Affidavit of Pina Martino, sworn November 17, 2016;

- (b) Affidavit of Gordon Dawson, sworn November 17, 2016;
- (c) Affidavit of Doretta Wilson, sworn November 16, 2016; and
- (d) Audio recordings of interviews conducted by Ms. Martino with individuals appearing on the Provincial Party Membership Registry.

The legitimacy of the Provincial Party Membership Registry that will be determinative of eligibility to vote at the Nomination Meeting pursuant to the Progressive Conservative Party of Ontario Rules Governing Candidate Nominations 2016-2018 (the "**Nomination Rules**") has been violated as a result of Surma's actions, as outlined above.

Accordingly, Ms. Marino requests that the Provincial Nomination Committee exercise its authority to revoke the approval of Surma as a Qualified Candidate pursuant to Rules 2.5 (viii) and 8.3 of the Nomination Rules on the grounds that Surma has breached the Nomination Rules [8.3 (iv)] and that her continued candidacy would bring harm, disrepute, or dishonor to the Progressive Conservative Party of Ontario [8.3 (vi)].

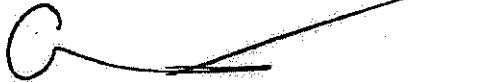
Alternatively, Ms. Martino requests that the nomination meeting currently scheduled for Monday, November 21, 2016 be adjourned by the Provincial Nomination Committee pursuant to Rules 2.5(ii) and 20.1 of the Nomination Rules on the grounds that such an adjournment is necessary to ensure the fair conduct of the nomination process, and in particular, the accuracy of the Provincial Party Membership Registry.

Ms. Martino reserves all rights to formally protest the Nomination Meeting pursuant to Rule 21 of the Nomination Rules and Article 27 of the Progressive Conservative Party of Ontario Constitution.

We look forward to your prompt response to the above by no later than November 18, 2016 at 5:00 pm.

Yours very truly,

**PALLET VALO LLP**



Per: Geoffrey Janoscik

GJ/ng

Enclosures

Copy: Client;

Mike Richmond - McMillan

AFFIDAVIT

I, Pina Martino, of the City of Toronto, in the Province of Ontario, do solemnly swear as follows:

1. I reside at [REDACTED] in the City of Toronto. I am a registered nomination candidate in the electoral district of Etobicoke Centre for the Ontario Progressive Conservative ("PC") Party.
2. In my capacity as a nomination candidate, on November 13, 2016, I received from the Ontario PC Party a list of Ontario PC Party members in Etobicoke Centre as at November 6, 2016. All individuals on this list are entitled to attend the nomination meeting scheduled for November 21, 2016 and vote for their choice for the Ontario PC Party candidate for Etobicoke Centre for the 2018 general election.
3. On November 14, 2016 at approximately 11:25 a.m., I attended at a residence at 2 Fletcher Place and spoke to a woman who answered to the name of Anna Pariselli. I introduced myself and asked her if she was coming to the November 21<sup>st</sup> nomination meeting given that she was now a member of the Ontario PC Party. She was surprised to hear she was a party member. I showed her a blank Ontario PC Party membership application and asked her if she had signed a membership form and paid a membership fee. She said she did not and did not understand why she had to pay to vote. She said that at some point in the preceding weeks, Kinga Surma and Doug Ford had come to her home and invited her to a meeting on November 21<sup>st</sup> to vote for Kinga. She said that this visit was in response to a robocall she received from Doug Ford inviting her to a meeting on November 21<sup>st</sup>. She said that neither Doug Ford nor Kinga Surma had asked her to sign a membership form or pay a membership fee.
4. On November 14, 2016 at approximately 11:38 a.m., I attended at a residence at 47 Fenley and spoke to a woman who answered to the name of Mrs. Zhang. I introduced myself and asked her if she was coming to the November 21<sup>st</sup> nomination meeting given that she was now a member of the Ontario PC Party. She said that she had not joined the Ontario PC Party. She said that in the preceding weeks, she had received a phone call from Doug Ford. I showed her where her name appeared along with her husband's on the membership list and she said she would be speaking to her husband. She said she never signed a membership form or paid a membership fee.
5. On November 14, 2016 at approximately 11:10 a.m. I attended at a residence at 69 Manorhampton Drive. An elderly woman with an Italian accent who answered to the name of Amelia Nicoletti answered the door. I am fluent in Italian and spoke to her in Italian. I introduced myself and asked her if she was coming to the upcoming meeting on November 21<sup>st</sup>. She said she did not know anything about it. I showed a blank membership form and asked her if she recalled signing the form or paying a membership fee. I asked her if either Doug Ford or Angelo Carnevale had recently come to see her. She said it was Angelo Carnevale. She said he never asked her to sign a form

and she did not pay him any money. She told me that she did not have any money to pay.

6. On November 14, 2016 at approximately 2:20 p.m. I attended at a residence at 20 Featherwood Place and spoke with a man who answered to the name of Aldo Pappa. I introduced myself and we conversed in Italian. I asked him if he was coming to the November 21<sup>st</sup> meeting. He said he received a phone call from Doug Ford inviting him to a meeting. I showed him the sample Ontario PC membership form and asked him if he had signed one and paid a fee. He got quite upset and said he "supports Ford" and he was only invited by Doug to come out to a meeting. He said he never signed a form and never paid any money.
7. On November 14, 2016 at approximately 1:10 pm I attended at a residence at 12 Easthampton and spoke to a woman who answered to the name of Josephina Visconti. I introduced myself. She had a strong Italian accent. In the Italian language, I introduced myself asked her if she was coming to the November 21<sup>st</sup> meeting given that she had signed the Ontario PC Party membership form and paid the fee. I showed her a blank Ontario PC Party membership form. She said she never signed a form and never paid anyone any money.
8. On November 14, 2016 at approximately 2:15 pm I attended at a residence at 63 Swordbill and spoke to an elderly woman who responded to the name of Rosa Girimonte. In the Italian language, I introduced myself and asked her if she was coming to the November 21<sup>st</sup> meeting now that she had signed the membership form and paid the membership fee. I showed her a blank Ontario PC Party membership form. She said that she never signed a form and never paid any money. I asked her if either Doug Ford or Angelo Carnevale had recently come to see her at her home. She said it was Angelo Carnevale. She said he had invited she and her husband to a meeting on November 21<sup>st</sup>.
9. On November 14, 2016 at approximately 1:55 p.m. I attended at a residence at 92 North Drive and spoke to a man who responded to the name of Albert Carbone. I introduced myself and asked him if he was coming to the November 21<sup>st</sup> nomination meeting since he had renewed his party membership and paid his fee. I showed him a blank Ontario PC Party membership form. He said he did not sign a membership form. He said he was not at home when Doug Ford recently came to visit and it was possible his wife had signed it and he would have to find out. He said he did not pay the fee.
10. During the course of my canvas of November 14, 2016, I spoke to 17 individuals who are named in Ontario PC Party membership applications submitted by Kinga Surma. Seven of those seventeen individuals advised me that they had either not signed a membership form or had not paid a membership fee or both.
11. On November 15, 2016 at approximately 11:20 am, I attended at a residence at 63 Yorkleigh Avenue and spoke to a man who answered to the name of Radmito Nada. I

introduced myself and asked him if he planned on attending the November 21<sup>st</sup> meeting given that he had signed the membership form and paid his fee. He knew about the nomination date from a call he had received from Doug Ford inviting him to a meeting. After showing him the membership form and asking him if he had signed it or paid a fee, he indicated he had done neither.

12. On November 15, 2016 at approximately 11:30 am, I attended at a residence at 20 Kingdom and spoke to a woman who answered to the name of Helen Marks. I introduced myself and asked her if she knew about the November 21<sup>st</sup> meeting. She said she knew about the meeting as a result of a robo call she received from Doug Ford. I showed her a blank Ontario PC Party membership form and asked her if she recalled signing the form and paying the membership form. She said that she did not sign the membership form or pay the fee.
13. On November 15, 2016 at approximately 12:35 pm, I attended at the residence at 59 Allanhurst Drive and spoke with a woman who answered to the name of Mrs. Kulic. I introduced myself and asked her if she was coming to the November 21<sup>st</sup> meeting given that she had signed a membership form and paid a fee. She said she knew about the November 21<sup>st</sup> meeting. I showed her a blank Ontario PC Party membership form and she said that Doug Ford and Kinga Surma had come to her home in the preceding weeks. She said she had signed the membership form but did not pay a fee. She said she was never told that she had to pay a membership fee.
14. On November 15, 2016 at approximately 2:20 pm, I attended at the residence at 43 Brampton and spoke with a man who answered to the name of Gavin Campbell. I introduced myself and asked him if he knew about the November 21<sup>st</sup> nomination meeting. He said he became aware of the November 21<sup>st</sup> meeting as a result of a robo call from Doug Ford. I showed him a blank Ontario PC Party membership form and asked him if he had signed the form and paid the membership fee. He said he had signed the form but had never paid the fee. He said no one told him he had to pay a fee.
15. On November 15, 2016 at approximately 2:25 pm, I attended at a residence at 14 Shipley and spoke to a man who answered to the name of Michael Hodgson. I introduced myself and asked him if he was coming to the November 21<sup>st</sup> meeting given that he had signed an Ontario PC Party membership form and paid the membership fee. He said he was aware of a meeting on November 21<sup>st</sup>. I showed him a blank Ontario PC Party membership form. He said he had not signed a membership form or paid a fee. He said that recently he had encountered Doug Ford and a young lady at a local Tim Horton's shop. He said that during that encounter, Doug Ford invited him to come to a meeting on November 21<sup>st</sup>. He said he never agreed to become a member of a political party.

16. On November 15, 2016 at approximately 3:50 pm, I attended at a residence at 24 Millsborough and spoke with a man who answered to the name of Mr. Solanki. I introduced myself and asked him if was coming to the November 21<sup>st</sup> meeting given that he had signed an Ontario PC Party membership form and paid the membership fee. He said he had not signed a membership form or paid a fee. He advised that Kinga Surma had been at his home earlier today and had given him the details on the location of the meeting. He said that she did not ask him to sign a membership form or pay a membership fee.
17. On November 15, 2016 at approximately 4:21 pm, I attended at a residence at 44 Eringate and spoke with a woman who answered to the name of Mrs. Sookhdoo. I introduced myself and asked her if she was planning on coming to the November 21<sup>st</sup> meeting given that she had signed an Ontario PC Party membership form and paid a membership fee. I showed her a blank Ontario PC Party membership form and she said she had signed the membership form but had never paid a fee. She said that she had never been asked to pay a fee.
18. On November 15, 2016 at approximately 4:25 pm, I attended at a residence at 45 Eringate and spoke with a man who answered to the name of Mr. Staropoli. I introduced myself and asked him if he planned on coming to the November 21<sup>st</sup> meeting given that he had signed the Ontario PC Party membership form and paid the membership fee. I showed him a blank Ontario PC Party membership form. He said that Doug Ford and Kinga Surma had come to his home in the preceding weeks. He said he was given the membership form to sign. He said he asked if he could read the form first before signing and was told by Doug Ford to just sign it. He said that when he asked Doug Ford if he had to pay, Doug Ford drew an "X" through the payment portion of the form and said 'no'. He said he signed the membership form but did not pay a membership fee.
19. On November 15, 2016 at approximately 4:35 pm, I attended at a residence at 12 Beckwith and spoke with an elderly couple who answered to the names of Mr. and Mrs. Lauria. I introduced myself and asked them if there were coming to the November 21<sup>st</sup> meeting given that they had signed the membership form and paid the membership fee. Mrs. Lauria said that Doug Ford and Kinga Surma had attended at their home in the preceding weeks. Mrs. Lauria said that both she and her husband had signed the forms but were never asked by either Doug Ford or Kinga Surma to pay a membership fee. Mr. Lauria asked me why he had to pay a fee in order to vote. I told him that the fee was to cover his membership in the Ontario PC Party. I showed them a blank Ontario PC Party membership form and pointed out the statement on the form which reads, "My membership fees are paid from my own funds or by an immediate family member.". Mr. Lauria asked for my business card and I provided it to him.
20. On November 15, 2016 at approximately 5:10 pm, I attended at a residence at 199 Wellesworth and spoke with a name who answered to the name of John Playter. I introduced myself and asked him if he was coming to the November 21<sup>st</sup> meeting given

that he had signed an Ontario PC Party membership form and paid a membership fee. I showed him a blank Ontario PC Party membership form. He said that he had become aware of the November 21<sup>st</sup> meeting as a result of an automated phone he had received from Doug Ford inviting him to the meeting. He said "the girl" had just been at his home earlier today. He said he not signed a form or paid a fee. He said that "the girl" did not ask him to sign a membership form or pay a fee.

21. During the course of my canvas on November 15, 2016 I spoke with 20 individuals who are named in Ontario PC Party membership applications submitted by Kinga Surma. Eleven of those twenty individuals advised me that they had either not signed a membership form or paid a membership fee or both.
22. On November 16, 2016 at approximately 11:34 am, I attended at a residence at 39 Farningham Drive and spoke with a man who answered to the name of Bruce Sutherland. I introduced myself and asked him if he was coming to the November 21<sup>st</sup> meeting and he said that he was planning on coming him. I showed him a blank Ontario PC Party membership form and asked him if he had signed it. He said he did not need to sign it. I asked him if he had paid a fee. He said he may have a long time ago. He said that he had become aware of the November 21<sup>st</sup> meeting from Kinga Surma. He said he was not going to sign anything and that he just planned on coming out to vote. He said he plans on voting Liberal. I asked him again if he signed a membership form or paid a fee and he said he did not. I recorded my conversation with Mr. Sutherland on my cell phone.
23. On November 16, 2016 at approximately 11:52 am, I attended at a residence at 14 Benedict Road and spoke with a young woman who answered to the name of Emily French. I introduced myself and asked her if she knew about the November 21<sup>st</sup> meeting and she said she did not know about it. I showed her a blank Ontario PC Party membership form and asked her if she had signed such a form. She said he did not sign the form and perhaps her father had signed it because she is under 18. I asked her if she had paid a fee or if she knew whether her father had signed it for her. She said she did not know. I recorded my conversation with Miss French on my cell phone.
24. On November 16, 2016 at approximately 12:25 pm, I attended at a residence at 1 Cowley and spoke with a man who answered to the name of Peter Schreiber. I introduced myself and said that since he had signed a membership form and paid a membership fee, he could vote. He said he did not know about a nomination meeting. He said he had been a PC member years ago. I asked him if he had received a call from either Doug Ford or Kinga Surma and he said Doug Ford had called. He said Doug Ford and someone else had come to their home. He was raking leaves and did not speak with them but his wife did. I showed him a blank Ontario PC Party membership form and asked him again if he had signed it or paid a membership fee. He said he did not. I asked him if he understood that he had become an Ontario PC Party member and he said he did not. I recorded my conversation with Mr. Schreiber on my cell phone.



25. On November 16, 2016 at approximately 12:25 pm, I attended at a residence at 31 Eastglen and spoke with a man who answered to the name of Jan Jacyla. I introduced myself to him. He said he was planning on coming to the meeting. I showed him a blank Ontario PC Party membership form and he said he signed it "for Surma" He said Doug Ford was her and he signed the form to support her.. He signed a form. I asked him if he paid a membership fee and he said he did not. I asked him if they had asked him to pay a fee to become a member of the Ontario PC Party and he said that they did not mention that. I recorded my conversation with Mr. Jacyla on my cell phone.
26. On November 16, 2016 at approximately 1:13 pm, in the company of Doretta Wilson, I attended at a residence at 42 Dixfield. I spoke to a woman who answered to the name of Phyllis Samaroo. I introduced myself as an Ontario PC Nomination Candidate. In response to a question from me, she said she was aware of the meeting on Monday, November 21<sup>st</sup>. I said that because she had signed an Ontario PC membership form and had paid her fee, she was entitled to vote at the meeting. I showed Phyllis Samaroo a blank Ontario PC Party and she said she signed a form. She said a lady came to see her and she signed a form but she did not know what she had signed. I asked her if the lady who came to see her was named Kinga Surma and she said did not know. I asked her if she paid anything and Ms. Samaroo said she did not pay anything. I asked her if the lady who came to see her asked her to pay a \$10 or \$15 fee and Miss Samaroo said she did not say anything about paying. I recorded my conversation with Miss Samaroo on my cell phone.
27. On November 16, 2016, at approximately 2:06 pm, in the company of Doretta Wilson, I attended at a residence at 56 Birgitta. I spoke to a man who answered to the name of Mr. Vergara. I introduced myself as an Ontario PC Nomination Candidate. In response to a question from me, he said he was aware of the meeting on Monday, November 21<sup>st</sup>. I showed him a blank Ontario PC Party membership form and asked him if he signed a membership form. He said he signed it. I asked him if he paid \$10 or \$15 and he said he did not pay anything. I asked him who came to see him to fill out the form and he said it was Doug Ford and Kinga Surma who had come to see him and they registered him and his son to vote. He said they did not ask him to pay \$10 or \$15. I asked him if they told him that he had to pay a fee of \$10 or \$15 to join the Ontario PC Party and he said they did not tell him anything. I recorded my conversation with Mr. Vergara on my cell phone.
28. On November 16, 2016 at approximately 2:10 p.m., in the company of Doretta Wilson, I attended at a residence at 119 Birgitta. I spoke to a man who answered to the name of Mr. Foon. I introduced herself as an Ontario PC Nomination Candidate. In response to a question from me, he said he was aware of the meeting on Monday, November 21<sup>st</sup>. I showed him a blank Ontario PC Party membership form and asked him if he signed a membership form and paid a fee. He said he did not sign anything and did not pay anything. I asked him who had told him about the meeting. He replied that it was

Doug Ford. I asked him if he was asked to pay a \$10 or \$15 membership fee and he said he did not pay anything. He said he could not afford to pay anything.

29. On November 16, 2016 at approximately 5:08 p.m., I attended at a residence at 48 Chapman Road. I spoke to a man who answered to the name of Mr. Siniavskaia. I introduced myself as an Ontario PC Nomination Candidate. In response to a question from me, he said he was not aware of the meeting on Monday, November 21<sup>st</sup>. I showed him a blank Ontario PC Party membership form and asked him if he had signed it. Mrs. Siniavskaia also came to the door. She initially said they did not sign any forms. She then said she had signed forms with Doug Ford and Kinga. I asked them if they had paid a membership fee of \$10 or \$15 to join the Ontario PC Party and she said they did not pay. She said that she did not know there was a fee to join. I recorded my conversation with Mr. & Mrs. Siniavskaia on my cell phone.
30. On November 16, 2016 at approximately 5:29 p.m., I attended at a residence at 35 Crane. I spoke to a woman who answered to the name of Mrs. Elkis. I introduced myself as an Ontario PC Nomination Candidate. In response to a question from me, she said she was aware of the meeting on Monday, November 21<sup>st</sup>. I showed her a blank Ontario PC Party membership form and asked her if she had filled out the form and paid a membership fee. She said Doug Ford visited them and she did not fill out a form or pay a fee. She said Doug Ford told them they could vote for Kinga on November 21. I said the meeting on November 21<sup>st</sup> was a meeting of the Ontario PC Party. She then spoke with her husband in a foreign language. She said that her husband could not vote because he did not understand English. I recorded my conversation with Mr. and Mrs. Elkis on my cellphone.
31. On November 16, 2016 at approximately 5:39 p.m., I attended at a residence at 32 Hill Garden. I spoke to a woman who answered to the name of Mrs. Poutsoungas. I introduced myself as an Ontario PC Nomination Candidate. In response to a question about the meeting on Monday, November 21<sup>st</sup> she said she would think about it. I asked her when Kinga Surma or Doug Ford came to her home, if she had filled out a form and paid a fee. She said she did not remember. I recorded my conversation with Mrs. Poutsoungas on my cellphone.
32. On November 16, 2016 at approximately 5:47 p.m., I attended at a residence at 4 La Rush. I spoke to a man who answered to the name of Sam Fiorino. I introduced myself as an Ontario PC Nomination Candidate. I asked him if he had signed a membership form or pay a membership fee. He said he did not. I recorded my conversation with Mr. Fiorino on my cellphone.
33. During the course of my canvas on November 16, 2016, I spoke with 17 individuals who are named in Ontario PC Party membership applications submitted by Kinga Surma. Thirteen of these seventeen individuals advised me that they had either not signed a membership form or paid a membership fee or both.

34. On November 16, 2016 between the hours of 6:30 pm and 8:00 pm, I called and spoke to the following individuals who advised me that they had signed a form presented to them by Doug Ford but they did not pay a membership fee and were not advised by Doug Ford that they were required to pay a membership fee:

- a) Tom Anderson and Betty Anderson residing at 390 Renforth Drive;
- b) Bette-Jean Argeropoulos residing at 14 Bigham Crescent;
- c) Balwinder Badhan residing at 416 The Westway, Unit 604;
- d) Maureen Beckley residing at 65 Garbutt Crescent;
- e) Robert Bobyk residing at 385 Markland Drive;
- f) Cynthia Roberts residing at 451 The West Mall, Unit 404;
- g) Mr. Salad residing at 364 The East Mall, Unit 312;
- h) Eileen Sant residing at 33 Rhinestone Drive;
- i) Mohammad Shahrukh residing at 416 The Westway, Unit 106;
- j) Sanja Simanic residing at 25 Longfield Road;
- k) Satinder Singh residing at 3 Risdon Court;
- l) Alicia Smreczynski residing at 36 Pebble Valley Lane;
- m) Lee-Anne Soper residing at 695 Martin Grove Road, Unit 1110;
- n) Margaret Sorcik residing at 272 Burnhamthorpe Road; and
- o) Mathew Stefanowits residing at 15 Tyler Place.

35. During this same time period, I called and spoke to Wolfgang Schroter residing at 20 Fontenay Court, Unit 210. In response to a question from me, he said that he did not sign a form and did not pay a fee. He said he was unaware of a nomination meeting. When I asked him how he came to be on a list of Ontario PC Party members, he said he did not know.

36. During the morning and afternoon of November 17, 2016, I went canvassing with Gordon Dawson, a volunteer on my campaign. He was present during each of the conversation detailed below.

37. On November 17, 2016 at approximately 11:23 am Gordon Dawson and I attended at a residence at 36 Gentian. I spoke to a woman who answered to the name of Mrs. Haeuserer. I introduced myself as an Ontario PC Nomination Candidate. In response to a question from me, she said she was aware of the meeting on Monday, November 21<sup>st</sup> and was planning on attending. I said that because she had signed an Ontario PC membership form and had paid her fee, she was entitled to vote at the meeting. I showed Mrs. Haeuserer a blank Ontario PC Party and she said she signed a form. She could not recall if she had paid a fee. I also spoke to Mr. Haeuserer. He said that he had signed the membership form. When asked, he said he did not pay a fee. He said he does not want to be a member. He said Doug Ford and Kinga Surma told him about the meeting. I explained the purpose of the nomination meeting and that it was only open to Ontario PC Party members. He said he did not want to contribute financially. When asked, he said he not pay fee at the time that he signed form. I read him the clause in

the application about paying for the membership fee from one's own funds. He said Doug Ford phoned and he committed himself and someone came by the house. He said they did not ask for anything. I recorded my conversation with Mr. & Mrs. Haeuserer on my cell phone.

38. On November 17, 2016 at approximately 11:55 a.m., Gordon and I attended at a residence at 49 Rangoon. I spoke to a woman who answered to the name of Mrs. Welegedera. I introduced myself as an Ontario PC Nomination Candidate. In response to a question, she said she was aware of the meeting on Monday, November 21<sup>st</sup>. I showed her the membership form and asked her if she signed a membership form. She said she did not sign the form. She said she did not pay a fee. She said she was not sure if her husband had paid the fee or signed the form for her. She said Doug Ford came to her door. I recorded my conversation with Mrs. Welegedera on my cell phone.
39. On November 17, 2016 at 12:08 pm, Gordon Dawson and I attended at a residence at 9 Dimplefield. I spoke to a man who answered to the name of Mr. Beauvais. I introduced myself as an Ontario PC Nomination Candidate. In response to a question from me, he said he was aware of the meeting on Monday, November 21<sup>st</sup>. I showed him the membership form and asked him if he signed a membership form and paid a fee. He said he signed the form with Doug Ford but did not pay anything. He said Doug Ford did not tell him that he had to pay. I recorded my conversation with Mr. Beauvais on my cell phone.
40. On November 17, 2016 at approximately 12:48 pm., Gordon Dawson and I attended at a residence at 27 Littlewood. I spoke to a man who answered to the name of Mr. Nenic. I introduced myself as an Ontario PC Nomination Candidate. In response to a question from me, he said he was aware of the meeting on Monday, November 21<sup>st</sup>. I showed him the membership form and asked him if he signed a membership form. He said he did not sign the form. He said he did not pay a fee. He said he was not sure if his wife had signed the form or paid the fee for him. He said Doug Ford came to his door. I recorded my conversation with Mr. Nenic on my cell phone.
41. On November 17, 2016 at approximately 12:55 p.m., Gordon Dawson and I attended at a residence at 18 Firestone. I spoke to a woman who answered to the name of Mrs. Donegan. I introduced myself as an Ontario PC Nomination Candidate. In response to a question from me, she said she was aware of the meeting on Monday, November 21<sup>st</sup>. I showed her the membership form and asked her if she and her husband signed a membership form. She said she did not sign the form. She said she did not pay a fee. She said she did not know if her husband had signed a form. I recorded my conversation with Mrs. Donegan on my cell phone.
42. On November 17, 2016 at approximately 12:57 p.m., Gordon Dawson and I attended at a residence at 33 Firestone. I spoke to a man who answered to the name of Mr. Castro. I introduced myself as an Ontario PC Nomination Candidate. In response to a question

from me, he said he was aware of the meeting on Monday, November 21<sup>st</sup>. I showed him the membership form and asked him if he signed a membership form. He said he signed it. He said he did not pay a fee. He said he was not told there was a fee. I recorded my conversation with Mr. Castro on my cell phone.

43. On November 17, 2016 at approximately 1:02 p.m., Gordon Dawson and I attended at a residence at 68 Hollister. I spoke to a man who answered to the name of Mr. O'Marra. I introduced myself as an Ontario PC Nomination Candidate. In response to a question from me, he said he was aware of the meeting on Monday, November 21<sup>st</sup>. I showed him the membership form and asked him if he signed the form and he said he had not. He said he did not pay a fee. He said Doug Ford came to his door. He said he was not home when Doug Ford came. He seemed upset when I showed him that his name appeared on the membership list. I provided him with the phone number for the Ontario PC Party Headquarters and told him he could tell them that he did not sign a membership form and could ask to be removed from the party's membership list. I recorded my conversation with Mr. O'Marra on my cell phone.
44. On November 17, 2016 at approximately 2:46 p.m., Gordon Dawson and I attended at a residence at 123 Crendon. I spoke to a woman who answered to the name of Ms. McPhee. I introduced myself as an Ontario PC Nomination Candidate. In response to a question from me, she said she was aware of the meeting on Monday, November 21<sup>st</sup>. I showed her the membership form and asked her if she signed a membership form. She said she signed the form. She said she did not pay a fee. She said that the person who brought her the form to sign did not tell her there was a fee to join the Ontario PC Party. She said they did not ask her for a fee. I recorded my conversation with Ms. McPhee on my cell phone.
45. On November 17, 2016 at approximately 2:51 p.m., Gordon Dawson and I attended at a residence at 25 West Wareside. Pina spoke to a woman who answered to the name of Mrs. Klamann. I introduced myself as an Ontario PC Nomination Candidate. In response to a question from me, she said she was aware of the meeting on Monday, November 21<sup>st</sup>. I showed her the membership form and asked her if she signed a membership form. She said she did not sign the form and perhaps her husband had signed it. She called her husband to the door. Mr. Klamann said he signed the form. He said he did not pay a fee. He said someone came to his door. He said he did not join the party. He said he did not intend on joining the Ontario PC Party and asked why he should pay. I recorded my conversation with Mr. & Mrs. Klamann on my cell phone.
46. On November 17, 2016 at approximately 3:15 p.m., Gordon Dawson and I attended at a residence at 12 Renova. I spoke to a man who answered to the name of Mr. Oblak. I introduced myself as an Ontario PC Nomination Candidate. In response to a question from me, he said he was aware of the meeting on Monday, November 21<sup>st</sup>. I showed him the membership form and asked him if he had signed a membership form. He said he may have signed the form. He said he could not remember if he paid a fee. He said

someone came to his home and perhaps his wife had signed it. I recorded my conversation with Mr. Oblak on my cell phone.

47. On November 17, 2016 at approximately 3:29 p.m., Gordon Dawson and I attended at a residence at 8 Queensland. I spoke to a woman who answered to the name of Mrs. Koshyk. I introduced myself as an Ontario PC Nomination Candidate. In response to a question from me, she said she was aware of the meeting on Monday, November 21<sup>st</sup>. I showed her the membership form and asked her if she had signed a membership form. She said she signed the form but did not pay a fee. She said she was not told that she had to pay a fee to join the Ontario PC Party and said they did not tell her anything about the money. I asked her if she understood that she was joining the PC party and she replied, "not really". I recorded my conversation with Mrs. Koshyk on my cell phone.
48. On November 17, 2016 at approximately 3.31 p.m., Gordon Dawson and I attended at a residence at 12 Queensland. I spoke to a woman who answered to the name of Mrs. Kryklywy. I introduced myself as an Ontario PC Nomination Candidate. In response to a question from me, she said she was aware of the meeting on Monday, November 21<sup>st</sup>. I showed her the membership form and asked her if she had completed a membership form. She said she did not complete the form. She said she did not pay a fee. She believed she likely did not have to pay because of the "Ford donation thing" and years ago she had paid "\$100 or something" for the bobblehead. She said she found out about the meeting as a result of Doug Ford coming to her home, in her words "from Doug". She said she did not remember filling out a form and she did not pay a fee. I recorded my conversation with Mrs. Kryklywy on her cell phone.
49. During the course of my canvas on November 17, 2016, I spoke with 19 individuals who are named in Ontario PC Party membership applications submitted by Kinga Surma. Fourteen of these nineteen individuals advised me that they had either not signed a membership form or paid a membership fee or both.

SWORN BEFORE ME at the City of Toronto

In the Province of Ontario

This 17<sup>th</sup> day of November, 2016

*Denise Marchildon*  
 A COMMISSIONER ETC  
 DENISE MARCHILDON  
 BARRISTER & SOLICITOR

*Pina Martino*  
 Pina Martino

# AFFIDAVIT

I, Gordon Dawson, of the City of Toronto, in the Province of Ontario, do solemnly swear as follows:

1. I reside at 78 Farningham Crescent in the City of Toronto in the electoral district of Etobicoke Centre.
2. During the morning and afternoon of November 17, 2016, I went canvassing with Pina Martino, a nomination candidate for the Ontario PC Party in Etobicoke Centre
3. On November 17, 2016 at approximately 11:23 am Pina Martino and I attended at a residence at 36 Gentian. Pina spoke to a woman who answered to the name of Mrs. Haeuserer. Pina introduced herself as an Ontario PC Nomination Candidate. In response to a question from Pina, she said she was aware of the meeting on Monday, November 21<sup>st</sup> and was planning on attending. Pina said that because she had signed an Ontario PC membership form and had paid her fee, she was entitled to vote at the meeting. Pina showed Mrs. Haeuserer a blank Ontario PC Party and she said she signed a form. She could not recall if she had paid a fee. Pina also spoke to Mr. Haeuserer. He said that he had signed the membership form. When asked, he said he did not pay a fee. He said he does not want to be a member. He said Doug Ford and Kinga Surma told him about the meeting. Pina explained the purpose of the nomination meeting and that it was only open to Ontario PC Party members. He said he did not want to contribute financially. When asked, he said he not pay fee at the time that he signed form. Pina read him the clause in the application about paying for the membership fee from one's own funds. He said Doug Ford phoned and he committed himself and someone came by the house. He said they did not ask for anything. I am aware that Pina was recording her conversation with Mr. & Mrs. Haeuserer on her cell phone.
4. On November 17, 2016 at approximately 11:55 a.m., Pina Martino and I attended at a residence at 49 Rangoon. Pina spoke to a woman who answered to the name of Mrs. Welegedera. Pina introduced herself as an Ontario PC Nomination Candidate. In response to a question from Pina, she said she was aware of the meeting on Monday, November 21<sup>st</sup>. Pina showed her the membership form and asked her if she signed a membership form. She said she did not sign the form. She said she did not pay a fee. She said she was not sure if her husband had paid the fee or signed the form for her. She said Doug Ford came to her door. I am aware that Pina was recording her conversation with Mrs. Welegedera on her cell phone.
5. On November 17, 2016 at 12:08 pm, Pina Martino and I attended at a residence at 9 Dimplefield. Pina spoke to a man who answered to the name of Mr. Beauvais. Pina introduced herself as an Ontario PC Nomination Candidate. In response to a question from Pina, he said he was aware of the meeting on Monday, November 21<sup>st</sup>. Pina showed him the membership form and asked him if he signed a membership form and

paid a fee. He said he signed the form with Doug Ford but did not pay anything. He said Doug Ford did not tell him that he had to pay. I am aware that Pina was recording her conversation with Mr. Beauvais on her cell phone.

6. On November 17, 2016 at approximately 12:48 pm., Pina Martino and I attended at a residence at 27 Littlewood. Pina spoke to a man who answered to the name of Mr. Nenic. Pina introduced herself as an Ontario PC Nomination Candidate. In response to a question from Pina, he said he was aware of the meeting on Monday, November 21<sup>st</sup>. Pina showed him the membership form and asked him if he signed a membership form. He said he did not sign the form. He said he did not pay a fee. He said he was not sure if his wife had signed the form, had paid the fee or signed the form for him. He said Doug Ford came to his door. I am aware that Pina was recording her conversation with Mr. Nenic on her cell phone.
7. On November 17, 2016 at approximately 12:55 p.m., Pina Martino and I attended at a residence at 18 Firestone. Pina spoke to a woman who answered to the name of Mrs. Donegan. Pina introduced herself as an Ontario PC Nomination Candidate. In response to a question from Pina, she said she was aware of the meeting on Monday, November 21<sup>st</sup>. Pina showed her the membership form and asked her if she and her husband signed a membership form. She said she did not sign the form. She said she did not pay a fee. She said she did not know if her husband had signed a form. I am aware that Pina was recording her conversation with Mrs. Donegan on her cell phone.
8. On November 17, 2016 at approximately 12:57 p.m., Pina Martino and I attended at a residence at 33 Firestone. Pina spoke to a man who answered to the name of Mr. Castro. Pina introduced herself as an Ontario PC Nomination Candidate. In response to a question from Pina, he said he was aware of the meeting on Monday, November 21<sup>st</sup>. Pina showed him the membership form and asked him if he signed a membership form. He said he signed it. He said he did not pay a fee. He said he was not told there was a fee. I am aware that Pina was recording her conversation with Mr. Castro on her cell phone.
9. On November 17, 2016 at approximately 1:02 p.m., Pina Martino and I attended at a residence at 68 Hollister. Pina spoke to a man who answered to the name of Mr. O'Marra. Pina introduced herself as an Ontario PC Nomination Candidate. In response to a question from Pina, he said he was aware of the meeting on Monday, November 21<sup>st</sup>. Pina showed him the membership form and asked him if he signed the form and he said he had not. He said he did not pay a fee. He said Doug Ford came to his door. He said he was not home when Doug Ford came. Pina provided him with the phone number for the Ontario PC Party Headquarters and told him so he could tell them that he did not sign a membership form and could ask to be removed from the party's membership list. I am aware that Pina was recording her conversation with Mr. O'Marra on her cell phone.



10. On November 17, 2016 at approximately 2:46 p.m., Pina Martino and I attended at a residence at 123 Crendon. Pina spoke to a woman who answered to the name of Ms. McPhee. Pina introduced herself as an Ontario PC Nomination Candidate. In response to a question from Pina, she said she was aware of the meeting on Monday, November 21<sup>st</sup>. Pina showed her the membership form and asked her if she signed a membership form. She said she signed the form. She said she did not pay a fee. She said that the person who brought her the form to sign did not tell her there was a fee to join the Ontario PC Party. She said they did not ask her for a fee. I am aware that Pina was recording her conversation with Ms. McPhee on her cell phone.
11. On November 17, 2016 at approximately 2:51 p.m., Pina Martino and I attended at a residence at 25 West Wareside. Pina spoke to a woman who answered to the name of Mrs. Klamann. Pina introduced herself as an Ontario PC Nomination Candidate. In response to a question from Pina, she said she was aware of the meeting on Monday, November 21<sup>st</sup>. Pina showed her the membership form and asked her if she signed a membership form. She said she did not sign the form and perhaps her husband had signed it. She called her husband to the door. Mr. Klamann said he signed the form. He said he did not pay a fee. He said someone came to his door. He said he did not join the party. He said he did not intend on joining the Ontario PC Party and said why should I pay. I am aware that Pina was recording her conversation with Mr. & Mrs. Klamann on her cell phone.
12. On November 17, 2016 at approximately 3:15 p.m., Pina Martino and I attended at a residence at 12 Renova. Pina spoke to a man who answered to the name of Mr. Oblak. Pina introduced herself as an Ontario PC Nomination Candidate. In response to a question from Pina, he said he was aware of the meeting on Monday, November 21<sup>st</sup>. Pina showed him the membership form and asked him if he had signed a membership form. He said he may have signed the form. He said he could not remember if he paid a fee. He said someone came to his home and perhaps his wife had signed it. I am aware that Pina was recording her conversation with Mr. Oblak on her cell phone.
13. On November 17, 2016 at approximately 3:29 p.m., Pina Martino and I attended at a residence at 8 Queensland. Pina spoke to a woman who answered to the name of Mrs. Koshyk. Pina introduced herself as an Ontario PC Nomination Candidate. In response to a question from Pina, she said she was aware of the meeting on Monday, November 21<sup>st</sup>. Pina showed her the membership form and asked her if she had signed a membership form. She said she signed the form but did not pay a fee. She said she was not told that she had to pay a fee to join the Ontario PC Party and said they did not tell her anything about the money. She was asked by Pina if she understood that she was joining the PC party and replied not really. I am aware that Pina was recording her conversation with Mrs. Koshyk on her cell phone.
14. On November 17, 2016 at approximately 3.31 p.m., Pina Martino and I attended at a residence at 12 Queensland. Pina spoke to a woman who answered to the name of Mrs.

Kryklywy. Pina introduced herself as an Ontario PC Nomination Candidate. In response to a question from Pina, she said she was aware of the meeting on Monday, November 21<sup>st</sup>. Pina showed her the membership form and asked her if she had completed a membership form. She said she did not complete the form. She said she did not pay a fee. She believed she likely did not have to pay because of the "Ford donation thing" and years ago she had paid "\$100 or something" for the bobblehead. She said she found out about the meeting as a result of Doug Ford coming to her home, in her words "from Doug". She said she did not remember filling out a form and she did not pay a fee. I am aware that Pina was recording her conversation with Mrs. Kryklywy on her cell phone.

SWORN BEFORE ME at the City of Toronto  
In the Province of Ontario this 17<sup>th</sup>  
Day of November, 2016

Denise Marchildon  
A Commissioner ETC.  
DENISE MARCHILDON  
BARRISTER & SOLICITOR

Gordon Dawson  
Gordon Dawson


### AFFIDAVIT

I, Doretta Wilson, of the City of Toronto, in the Province of Ontario, do solemnly swear as follows:

1. I reside at 57 Twyford Road in the City of Toronto in the electoral district of Etobicoke Centre.
2. During the afternoon of November 16, 2016, I went canvassing with Pina Martino, a nomination candidate for the Ontario PC Party in Etobicoke Centre
3. On November 16, 2016 Pina Martino and I attended at a residence at 42 Dixfield. Pina spoke to a woman who answered to the name of Phyllis Samaroo. Pina introduced herself as an Ontario PC Nomination Candidate. In response to a question from Pina, she said she was aware of the meeting on Monday, November 21<sup>st</sup>. Pina said that because she had signed an Ontario PC membership form and had paid her fee, she was entitled to vote at the meeting. Pina showed Phyllis Samaroo a blank Ontario PC Party an she said she signed a form. She said a lady came to see her <sup>and</sup> she signed a form but she did not know what she had signed. Pina asked her if the lady who came to see her was named Kinga Surma and she said did not know. Pina asked her if she paid anything and Ms. Samaroo said she did not pay anything. Pina asked her if the lady who came to see her asked her to pay a \$10 or \$15 fee and Miss Samaroo said she did not say anything about paying. I am aware that Pina was recording her conversation with Miss Samaroo on her cell phone. The audio recording is an accurate account of the conversation that took place between Pina Martino and Phyllis Samaroo. *DM*
4. On November 16, 2016, Pina Martino and I attended at a residence at 56 Birgitta. Pina spoke to a man who answered to the name of Mr. Vergara. Pina introduced herself as an Ontario PC Nomination Candidate. In response to a question from Pina, he said he was aware of the meeting on Monday, November 21<sup>st</sup>. Pina showed him the membership form and asked him if he signed a membership form. He said he signed it. Pina asked him if he paid \$10 or \$15 and he said he did not pay anything. She asked him who came to see him to fill out the form and he said it was Doug Ford and Kinga Surma who had come to see him and they registered him and his son to vote. He said they did not ask him to pay \$10 or \$15. Pina asked him if they told him that he had to pay a fee of \$10 or \$15 to join the Ontario PC Party and he said they did not tell him anything. I am aware that Pina was recording her conversation with Mr. Vergara on her cell phone. The audio recording is an accurate account of the conversation between Pina Martino and Mr. Vergara.
5. On November 16, 2016, Pina Martino and I attended at a residence at 119 Birgitta. Pina spoke to a man who answered to the name of Mr. Foon. Pina introduced herself as an Ontario PC Nomination Candidate. In response to a question from Pina, he said he was aware of the meeting on Monday, November 21<sup>st</sup>. Pina showed him the membership

form and asked him if he signed a membership form and paid a fee. He said he did not sign anything and did not pay anything. Pina asked him who told him about the meeting. He replied that it was Doug Ford. Pina asked him if he was asked to pay a \$10 or \$15 membership fee and he said he did not pay anything. He said he could not afford to pay anything.

SWORN BEFORE ME at the City of Toronto  
In the Province of Ontario this 16<sup>th</sup>  
Day of November, 2016

  
DENISE MARCHILDON  
BARRISTER & SOLICITOR

(A COMMISSIONER FOR TAKING  
AFFIDAVITS )

  
Doretta Wilson