

## BRIEFING: 'VOTE LEAVE'

**PLEASE NOTE:** This report is provided to you as independently conducted research and information towards the best possible representation of the 'leave' outcome in the forthcoming EU referendum. It has been circulated to a range of organisations that will be campaigning for a 'leave' vote.

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### INTRODUCTION

Vote Leave is a superficially slick organisation that has evidently had a significant amount of money thrown at it and has the Westminster connections to attract elite support. However, the established anti-EU movement in Britain is broader and long-standing. Endorsement and funding from a handful of millionaires giving a professional veneer to a few newcomers to anti-EU campaigning does not make a new organisation like Vote Leave a credible or representative 'leave' campaign for the forthcoming EU referendum.

This report details how Vote Leave founders Matthew Elliott (chief executive), Dominic Cummings (campaign director) and their leading supporters and colleagues are not sufficiently committed, competent, appropriate nor adequately representative figures to be designated as the official 'leave' campaign in the EU referendum. It covers how Vote Leave:

1. **Does not represent those campaigning for the outcome to the greatest extent**

It is overly Conservative focussed, supported chiefly by front organisations, most of its MP backers represent only themselves, its leadership has an antagonistic relationship with the political left and those involved are embroiled in in-fighting as well as refusing to engage with other significant 'leave' campaigners.

2. **Does not reflect accurately the option on the ballot that it seeks to represent**

Leading Vote Leave figures support two referendums and further EU questions being put to voters; the group is opposed to Article 50 of the EU Treaty being triggered, which is the only legal process to deliver Britain's exit from the EU, and leading Vote Leave organisers and backers have until quite recently held inconsistent views on whether Britain should leave the EU.

3. **Lacks respect for referendum rules**

Vote Leave has stated it has plans to break the referendum spending limits, has been involved in self-proclaimed “nasty” and deceptive campaigning and has pre-judged the designation decision by claiming it will be the official EU referendum ‘leave’ campaign.

4. **Is organised by people with a questionable financial background**

Its chief executive and deputy chairman are embroiled in a Charity Commission investigation; the campaign previously run by Vote Leave’s chief executive and two other Vote Leave directors mis-filed its company accounts and may be under investigation by Companies House; and its chief executive faces questions about contracts given by the campaign he previously ran to a commercial company in which he held a financial interest.

5. **Is caught up in conflicts of interest**

Its chief executive has previously had interests in commercial marketing of political data relating to single issue campaigns, and may still; He also has strong links with Downing Street having been linked with a No.10 job, purportedly had frequent contact with a leading adviser to the PM and Vote Leave has received the overt endorsement of Downing Street.

6. **Lacks campaigning credibility**

The No2AV campaign on which its chief executive’s reputation rests was far from a glittering example of campaign skills and Vote Leave has already been involved in a series of embarrassing and incompetent gaffes.

Critically, key figures in Vote Leave are currently embroiled in **an investigation by the Charity Commission** for abuse of charitable rules in directing charitable grants almost exclusively to the political organisations of the charity’s original founder – Vote Leave’s chief executive Matthew Elliott; are very likely due to the tax implications of the same scheme to also be **under investigation by HMRC**; and Vote Leave has also been **reported to the police** after a leading MP supporter declared an intention to circumvent referendum spending rules and a police investigation may also be on-going.

It would seem extraordinary in these circumstances that such an organisation would even attempt to be designated by the Electoral Commission as an official referendum campaign and an appropriate entity to receive £600,000 of public money. Nevertheless, that appears to be Vote Leave’s intention.

## LEGAL STATUS

Vote Leave is one of the organisations that will be applying to the Electoral Commission for designation as the official 'leave' campaign in the forthcoming EU referendum.

The company behind the campaign, Vote Leave Ltd, is solely owned by Matthew Elliott. He is the company's founding director and only 'member' (ultimate authority, even to dismiss registered company directors). He also acts as the campaign's chief executive.

This company was founded on 18 September 2015 as "Vote Leave Get Change Ltd". Matthew Elliott was its sole founding director and was listed on its incorporation document as its only member.<sup>[1]</sup> A few days later, the company's name was changed to "Vote Leave Ltd".

On 23 February 2016, Matthew Elliott's appointment as a company director of Vote Leave Ltd was terminated. However, he remains the company's only member and continues to be employed as its chief executive.

This is highly relevant to the designation decision, because it is important to know exactly who is being designated. Members govern companies, directors manage them. An array of company directors may look impressive, but they are the employees of the company's member(s) and can be dismissed or overruled in the member(s)' interest. This makes Matthew Elliott the potential sole beneficiary of the assets of the company, including any data it gathers or money, public or private, it is given.

**The only certain potential designee under consideration with respect to Vote Leave Ltd is Matthew Elliott.**

[1] <https://beta.companieshouse.gov.uk/company/09785255/filing-history?page=2>

## 1. Does not represent those campaigning for the outcome to the greatest extent

- **Conservative heavy**

The fundamental backing, staffing and therefore the overwhelming focus of the Vote Leave campaign is Conservative. Its two founders and lead organisers are two right-wing policy advocates closely linked to the party. Its self-appointed chief executive, Matthew Elliott, co-founded and ran the Taxpayers' Alliance, which has for ten years campaigned for lower taxes and cuts to public services, such as a recent demand for immediate cuts to pensioner benefits.<sup>[2]</sup> Prior, in 2013, to launching Business for Britain, a pro-EU campaign for renegotiation and EU reform that to a large extent echoed government policy, Elliott was linked with a Downing Street job to the degree that, reportedly, he was even "shown his desk".<sup>[3] [4]</sup>

Vote Leave's campaign director, Dominic Cummings is an even more controversial figure. He is a former special adviser to the Conservative MP and cabinet minister Michael Gove and, when Mr Gove was Education Minister, was the driving force behind the government's controversial free schools policy. Cummings has variously been described as "abrasive, "confrontational", "strange" and "eccentric to the point of being slightly mad". During his time as a special adviser to Michael Gove he provoked numerous lurid headlines by strongly criticising the way government was run.

Vote Leave's chairman was until recently the Conservative peer and former chancellor Lord (Nigel) Lawson and its chief funder is the former Conservative treasurer, Peter Cruddas, who has reportedly given the campaign £1 million.<sup>[5]</sup> Its leading staff members have come from the Taxpayers' Alliance, Business for Britain or other Conservative sources. Its head of media Robert Oxley was formerly campaign director of Business for Britain and campaign manager for the Taxpayers' Alliance. Its research director, Oliver Lewis, also had the same role at Business for Britain and used to work for several Conservative MPs including, again, Michael Gove and Andrew Lansley, like Cummings, on the government's free schools policy.<sup>[6]</sup> Its Communications Director, Paul Stephenson, describes himself as a "former Tory SPAD" (special adviser).<sup>[7]</sup> Even Vote Leave's most prominent UKIP supporter, the party's only MP Douglas Carswell, was a Conservative MP until August 2014.

In addition, several of its supportive 'for Britain' related groups created under the guidance of

[2] <http://www.bbc.co.uk/news/uk-politics-34439965>

[3] <http://www.telegraph.co.uk/news/politics/david-cameron/9214153/No-10-ponders-job-for-TPAs-Matthew-Elliott.html>

[4] <http://www.conservativehome.com/platform/2015/11/isabel-oakeshott-brexiteers-dont-know-friend-from-enemy.html>

[5] [www.ft.com/cms/s/0/db7ce4fe-8e17-11e5-a549-b89a1dfede9b.html](http://www.ft.com/cms/s/0/db7ce4fe-8e17-11e5-a549-b89a1dfede9b.html)

[6] <http://www.standpointmag.co.uk/writers/?showid=Oliver%20Lewis>

[7] [https://twitter.com/stephenson\\_pr](https://twitter.com/stephenson_pr)

Matthew Elliott are run by those with Conservative links. Beyond 'Conservatives for Britain', the 'Christians for Britain' group is fronted by Adrian Hilton, a Conservative-supporting Oxford academic and the 'Bangladesh for Britain' group has been set up by an organiser of the Conservative Friends of Bangladesh. **[See Appendices for further details]**

Further, *The Independent* recently reported on the staff, board member and office links between Vote Leave and what they called a "nexus of centre-right organisations" providing the group with helpful research.<sup>[8]</sup> The many clear interlinks between the organisations undermines Vote Leave's claims that the research from which they quote is "independent" and, whether or not it is fair to say the organisations are linked, the evident closeness of those involved with those running Vote Leave only degrades the quality of the EU referendum debate.

This strong Conservative bias is reflected inevitably in Vote Leave's activities. In its media output, Vote Leave primarily wields Conservatives, from the six cabinet ministers who recently diverged from the government's stance to probably its leading political figure Boris Johnson. Inevitably the media's greatest interest will be on political personalities, but clearly little effort is being made to rebalance this bias away from the views within only one party. While Vote Leave undoubtedly has a few backers from other parties, its focus is now, and inevitably would continue to be were it to be designated the official campaign, on its Conservative supporters - as that is the political comfort zone of its chief organisers.

The result is a 'leave' campaign that does not represent those campaigning for this outcome to the greatest extent. According to the 2015 general election result, their approach is only likely to speak to around 36% of the electorate and does not represent the full, broad extent of those supporting a 'leave' outcome across and beyond the political parties.

- **Front organisations**

Vote Leave will claim that is supported by Business for Britain, together with a range of 'for Britain' styled offshoots purporting to represent special interests. However, these organisations are all either directly or very closely linked. Many are hand-in-glove operations established by Vote Leave chief executive Matthew Elliott, for the purpose of declaring support for himself. The leading supporters of these groups tend to be a subset of existing Vote Leave supporters, re-presented. For example, leading spokespeople at the recent launch of Women for Britain were Priti Patel MP (Conservative) and Suzanne Evans MEP (UKIP). Prior to launching Vote Leave, Matthew Elliott established and appointed himself chief executive of Business for Britain. Vote Leave does not appear to be backed by a single organisation with a historic and

[8] <http://www.independent.co.uk/news/uk/politics/eu-referendum-think-tanks-carrying-out-independent-research-to-support-brexitee-have-close-links-to-a6866011.html>

independent record of campaigning against EU membership – only by fronts that Vote Leave organisers have set-up and arranged in order to give the appearance of a breadth of support. **[See Appendices for full list and details]**

- **Irrelevance of MPs**

Vote Leave’s claim to represent those supporting a ‘leave’ vote is underpinned chiefly by its backing from a number of MPs, including cabinet ministers. While these individuals are certainly important Westminster figures, in truth few are publicly known and few have a history in supporting Britain leaving the EU beyond their decision in recent weeks. Most had, until recently, adopted a ‘wait and see’ attitude to the Prime Minister’s renegotiation, indicating a certain shallowness to their backing for the ‘leave’ outcome.

Additionally, it is highly questionable who, beyond themselves, MPs represent in the EU referendum debate. Naturally, cabinet ministers and MPs carry weight with the media in terms of backing a particular organisation. However the question of being in or out of the EU was a position on which only very few stood at the last general election. In so far as the EU was raised, for the vast majority of MPs now backing Vote Leave their party’s policy was to seek renegotiation and maintain the option of remaining a member of the EU. That was therefore the basis on which they were elected. Now that they are taking a different view, most of these MPs cannot now claim fairly to represent their constituents on this specific issue. The views of those MPs are therefore no more representative than anyone else’s in this referendum. They represent only themselves. Having, say, 200 MPs and ministers backing a campaign and among your chief supporters is therefore interesting. But there is a very weak case that these MPs contribute significantly to representing wider support for the ‘leave’ outcome.

Further, in the case of the Conservatives, regardless of the MP’s view, local party organisations are committed to a position of neutrality and to not offer resources to either side in the EU referendum. The support of a Conservative MP therefore does not entail the support of his/her constituency organisation.

- **John Mills**

Vote Leave will no doubt hold up John Mills as a prominent Labour party supporter and donor backing their campaign and as an example of their political breadth. However, Mills is not a novel recruit to its chief executive Matthew Elliott’s political campaigns. He has been a long-standing supporter of Elliott’s political activities, including serving since 2007 as a trustee for the charity (the Politics and Economics Research Trust) that has, controversially, almost exclusively

funded the Taxpayers' Alliance and, more recently, Business for Britain with its six-figure grants (see Section 4, Financial probity, below).<sup>[9]</sup> Mills also served as co-chairman of Business for Britain, of which Elliott was previously chief executive. It is no surprise at all to see John Mills now backing Matthew Elliott's latest political organisation.

Neither is it clear that John Mills enjoys personally any significant connections or support within the Labour party. He has never been a 'Blairite' or so-called moderniser, yet has also been highly critical of the party's current leader Jeremy Corbyn, pledging to withhold any further donations while Corbyn remains leader.<sup>[10]</sup> He has deployed his wealth to try to generate media pressure on the party to reflect his views, but that seems to be the extent of his influence on the party.

- **Left antagonism**

Vote Leave's political outreach is intrinsically limited by its chief executive Matthew Elliott being an antagonistic figure to Labour party supporters and others on the political left. He is primarily known as the founder of the Taxpayers' Alliance, a group campaigning for low taxes and public spending cuts that makes highly controversial demands such as its recent call for an immediate end to pensioner benefits.<sup>[11]</sup> He is well known in right-wing Westminster circles, speaking at such events as the Freedom Association's 'Inaugural Margaret Thatcher Memorial Weekend'.<sup>[12]</sup>

The Taxpayers' Alliance under Elliott's stewardship also engaged in regular confrontation with the leading anti-EU trade union the RMT over, bizarrely, the union's private pay arrangements with its then general secretary.<sup>[13]</sup> There is little chance, consequently, that the RMT will work with a campaign organised by Elliott, but with over 80,000 members the union is probably the biggest organised anti-EU advocate on the political left. This very personal schism will therefore greatly inhibit the ability of a 'leave' campaign in which Elliott has a prominent role being fully representative of those seeking the 'leave' outcome.

Elliott is also known for running the No2AV campaign in the 2011 Alternative Vote referendum. Writing after the vote, his former No2AV colleague Peter Botting described how Elliott's association with the Taxpayers' Alliance "complicated" getting the left on board, due to "the Labour party's suspicion of, and historic hostility, towards the influential low tax lobbying

[9] <https://beta.companieshouse.gov.uk/company/05982645/officers>

[10] <http://www.telegraph.co.uk/news/politics/labour/11862424/Labours-biggest-individual-donor-to-stop-funding-party-after-Jeremy-Corbys-victory.html>

[11] <http://www.bbc.co.uk/news/uk-politics-34439965>

[12] <http://www.tfa.net/events/57/the-inaugural-margaret-thatcher-birthday-weekend/>

[13] [http://www.taxpayersalliance.com/union\\_hypocrisy\\_continues](http://www.taxpayersalliance.com/union_hypocrisy_continues)

group the Tax Payers' Alliance".<sup>[14]</sup> Such problems have already been evident in Vote Leave. In February 2016 it appeared from media reports that a split had developed both between leading Vote Leave organisers and within the associated group Labour Leave over a number of its MPs and leading organisers wishing to separate from Vote Leave (see details below)

- **Infighting and splits**

According to Electoral Commission guidance, a key criterion for designation is the applicant's "organisational capacity to represent other campaigners for the same outcome including how you would engage with them". However Vote Leave appear to have trouble engaging with each other even within their own organisation, nevermind beyond, and there is little evidence of serious intention to engage with campaigners beyond their own, self-constructed, supportive groups.

Reports of splits have focussed on disagreements over the role and operational style of Vote Leave's campaign director Dominic Cummings and concern among Conservative MPs that Cummings was using his role with the campaign to "pursue a personal vendetta against the Prime Minister".<sup>[15]</sup> *Private Eye* on 22 January 2016 reported how a steady stream of Vote Leave staff had been quitting after coming into conflict with Cummings, from their grassroots director Richard Murphy (over the group's narrow interest in largely digital and online campaigning) and his deputy, to several policy analysts.<sup>[16]</sup> Internal turmoil at Vote Leave bubbled further into the open on 16 January when *The Times* reported that "up to 30" Conservative MPs had refused to back Vote Leave over "infighting" and donors were withholding funds until the situation "calmed down".<sup>[17]</sup> On 28 January 2016 it was reported that a group of MPs were seeking the removal of both Cummings and Vote Leave's chief executive Matthew Elliott from their roles with the organisation.<sup>[18]</sup> The following day the MPs behind the move were revealed as not only senior eurosceptic Conservative Bernard Jenkin but also cabinet minister Chris Grayling. 'Conservatives for Britain' co-chair Steve Baker also reportedly refused to give Cummings his support.<sup>[19]</sup>

The fallout was not confined to Conservative backers of Vote Leave. On 4 February 2016 *The Guardian* reported on an email spat between Cummings and the group's leading Labour

[14] <http://peterbotting.co.uk/clients-case-studies/no-to-av-referendum-campaign-no2av/>

[15] <http://www.thetimes.co.uk/tto/news/politics/article4648215.ece>

[16] [http://www.huffingtonpost.co.uk/2015/11/30/vote-leave-eu-referendum-brexit\\_n\\_8680648.html](http://www.huffingtonpost.co.uk/2015/11/30/vote-leave-eu-referendum-brexit_n_8680648.html)

[17] <http://www.thetimes.co.uk/tto/news/politics/article4667089.ece>

[18] <http://www.thetimes.co.uk/tto/news/politics/article4676308.ece>

[19] <http://www.thetimes.co.uk/tto/news/politics/article4677262.ece>

supporter and deputy chair John Mills.<sup>[20]</sup> The leaked email from Mills to Cummings criticised as “damaging and unnecessary” bickering and personal attacks within the group and was described as “a sign of the bitter infighting in the Vote Leave group”. Mills asked Cummings **“What on earth are you doing, generating more and more ill feeling like this entirely unnecessarily? I thought you had promised to stop doing this sort of thing. Don’t you realise that this kind of behaviour puts more and more damaging and unnecessary strain on everyone?”**

Mills’s outburst was followed by reports that the Labour Leave group was splitting from Vote Leave, with its most senior and best known anti-EU MP Kate Hoey saying **“I have made it clear I was not prepared to work with Vote Leave.”**<sup>[21]</sup> However, the situation then descended into farce with reports of further splits within Labour Leave. Its “co-owner” John Mills put out a statement contradicting Hoey’s and his fellow Labour Leave director Brendan Chilton’s view of the situation, declaring that the group itself would still be backing Vote Leave.<sup>[22]</sup> Kate Hoey used an interview with the *Sunday Telegraph* on 7 February 2016 to explain her decision to stop working with Vote Leave, saying **“It’s about style of campaigning and it’s about the lies some of them have been saying.”**<sup>[23]</sup> Speaking about Vote Leave’s chief executive Matthew Elliott and campaign director Dominic Cummings, having until that time worked closely with them, Hoey said: **“what they have not got the capacity to do is work with ‘ordinary people’ and all the other little campaigns that have been there for years, working really hard. They haven’t got the capacity to bring people together – and that’s what we need now.”**

At the same time as this severe internal disruption, Vote Leave’s only senior Green party backer, Baroness Jenny Jones, also quit over the appointment of Lord Lawson as Vote Leave’s chairman, representing another major loss on the left of Vote Leave’s political support.<sup>[24]</sup>

Beyond infighting within Vote Leave, leading long-established anti-EU groups, such as the Democracy Movement – which was for many years, until recent groups formed to tackle the referendum, the largest cross-party anti-EU campaign – report that they have never been invited to participate in any discussions with Vote Leave, nevermind their engagement sought with Vote Leave’s campaign. There have also been numerous reports of attempts to forge a merger with other leading ‘leave’ groups on very generous terms to Vote Leave, but these have also been rejected repeatedly.<sup>[25]</sup>

[20] <http://www.theguardian.com/politics/2016/feb/04/vote-leave-deputy-chairman-condemns-damaging-bickering-mills-cummings-referendum>

[21] <http://www.thetimes.co.uk/tto/news/world/europe/article4683699.ece>

[22] <http://blogs.spectator.co.uk/2016/02/split-in-labour-leave-over-whether-it-has-left-vote-leave/>

[23] <http://www.telegraph.co.uk/news/newstoppers/eureferendum/12144523/EU-referendum-Leave-campaign-in-civil-war.html>

[24] <https://twitter.com/GreenJennyJones/status/695568635092451328>

[25] <http://www.breitbart.com/london/2016/02/05/farage-vote-leave-campaign-are-talking-about-a-double-referendum-we-cant-allow-it/>

## Conclusion

The overall picture is one of disruptive characters, dysfunctional internal organisation and a lack of willingness – clearly, at times, even an inability – to work with others, particularly those of a non-Conservative political persuasion, and even those with significant support and long-standing history of campaigning for the ‘leave’ outcome. Coupled to the shallow level of representation offered by their backing from MPs the vast majority of whom did not campaign to leave the EU at the last general election and, in the case of the Conservatives, whose local party organisations are committed to a neutral stance, Vote Leave’s claim to be able to represent those campaigning for the ‘leave’ outcome is, at best, extremely superficial, if not virtually non-existent beyond narrow Conservative lines.

## 2. Does not reflect accurately the option on the ballot that it seeks to represent

- **Two referendums**

Numerous reports have highlighted that leading figures within Vote Leave see a leave vote in the EU referendum as merely a tactic for demanding a better deal from the EU than the Prime Minister has been able to achieve. They argue that this second deal should then be put to the people in a second referendum, hoping that this will then be approved and the UK will remain in a further reformed EU.

The idea of a second referendum was first floated by Vote Leave campaign director Dominic Cummings on his blog in June 2015.<sup>[26]</sup> He argued that the ‘leave’ campaign should say to voters: **“If you vote NO, you will force a new Government to negotiate a new deal and give you a new vote”** and **“If you want to say ‘stop’, vote NO and you will get another chance to vote on the new deal.”** However, Cummings also admitted the advantages to the government and ‘in’ campaign of such a demand for a second vote, saying: **“Offering a second vote would give them the opportunity to reverse a loss in the first, so that YES means victory and NO does not necessarily mean defeat.”** Cummings therefore advocates a strategy that offers the government the opportunity to dodge delivering what a vote to leave would represent.

This was followed by a further blog post on 6 July 2015, saying: **“Some [Conservative] leadership candidates will like the idea of a second referendum – it allows them to position themselves against Cameron’s deal without committing themselves to OUT” ... “A NO vote in the first referendum would not, as a matter of fact or law, mean we had left the EU or would immediately leave. It would in practice be a rejection of Cameron’s deal and a direction from the public for a new government team to negotiate a new deal...”**<sup>[27]</sup>

Given such ideas argue against interpreting a ‘leave’ vote as actually meaning Britain should leave the EU, suspicions immediately grew among committed and long-standing anti-EU campaigners that, especially given the strong government connections of both of Vote Leave’s leading organisers Cummings and Elliott, the push for ‘two referendums’ could equally be a strategy for ignoring the real mandate of a ‘leave’ vote and turning such an outcome into a means to keep Britain in the EU. Doubts were raised about the commitment of Cummings and

[26] <https://dominiccummings.wordpress.com/2015/06/23/on-the-referendum-6-exit-plans-and-a-second-referendum/>

[27] <https://dominiccummings.wordpress.com/2015/07/06/on-the-referendum-9-cameron-begins-his-renegotiation-the-commission-sets-out-its-timetable-for-new-treaty-pre-2025-bj-sj-make-moves-a-greek-no>

Vote Leave, of which he is campaign director, to genuinely leaving the EU in accordance with the option on the ballot paper that Vote Leave is seeking to represent.

The ‘two referendums’ idea was immediately picked up by London mayor Boris Johnson, as reported by the *Sunday Times* later that month.<sup>[28]</sup> The newspaper’s political editor Tim Shipman reported that: **“Johnson has told friends that a “no” vote is desirable because it would prompt Brussels to offer a much better deal, which the public could then support in a second referendum,”** going on to quote Johnson as saying **“We need to be bold. You have to show them that you are serious.”** Shipman also quotes a ‘friend’ of the mayor, saying: **“I don’t think in his heart Boris wants us to walk away. But he’s interested in us saying no because it won’t be what we want. That would mean a second vote. He thinks the only way to deal with these people is to play hardball.”**

It’s also clear that, for Cummings, the ‘two referendums’ strategy was far from a passing idea. Since June, Vote Leave’s campaign director has repeatedly argued the case for a second referendum, on his blog, on twitter and in interviews, despite admitting that the country would be in **“confusing and unknown territory,”** under his plan if the people voted ‘leave’ in the first referendum and then ‘no’ to a further negotiated deal.<sup>[29]</sup> To most, such a scenario would be taken as a sign that the public really did want to fully leave the EU. But revealingly, Cummings’s reaction was that, in this scenario, **“there might be little/no time to fix what the public disliked”**, further reinforcing the perception that his true goal is to “fix” a tolerable deal that would secure public support for Britain remaining in the EU – not deliver Britain leaving.

Vote Leave’s chief executive, Matthew Elliott, has denied that a second referendum - ‘Leave to Remain’ or a choice between ‘in and half-in’, as the media has dubbed the strategy - is Vote Leave’s official policy. But a Weekly Update from the campaign as recently as 15 January 2016 said, in response to the news that George Osborne had rejected the idea of second referendum: **“If we Vote Leave, we have a chance of forcing a better UK-EU relationship. We keep the process alive, we give ourselves a chance.”**<sup>[30]</sup> Given there is no current process of negotiating an exit deal to ‘keep alive’, to keeping what process alive, for a chance of what outcome does this statement refer – if not the existing government strategy of renegotiation and staying in the EU?

In a subsequent interview with *The Economist* on 21 January 2016, Dominic Cummings continued to talk up the idea of a second referendum if people vote ‘leave’ and repeated his support for the idea, saying **“I think there’s a strong democratic case for it.”**<sup>[31]</sup> In a *Bloomberg*

[28] [http://www.thesundaytimes.co.uk/sto/news/uk\\_news/article1574571.ece](http://www.thesundaytimes.co.uk/sto/news/uk_news/article1574571.ece)

[29] See reply to Matthew Parris in comments: <https://dominiccumings.wordpress.com/2015/07/20/on-the-referendum-11-new-icm-poll-on-a-second-referendum-idea-boris-etc/#comments>

[30] [http://www.voteleavetakecontrol.org/campaign\\_news\\_weekly\\_update\\_15\\_jan](http://www.voteleavetakecontrol.org/campaign_news_weekly_update_15_jan)

[31] <http://www.economist.com/blogs/bagehot/2016/01/out-campaign>

report on the same day he was reported as saying a second referendum offers a “second bite of the cherry, no downside” – presumably referring to continued negotiations with the EU, rather than Britain’s departure as a ‘leave’ vote would in fact mandate.<sup>[32]</sup>

The most recent (and also very senior) Vote Leave supporter to back a second referendum is Lord (Michael) Howard, the former Conservative party leader. Speaking to the *BBC Radio 4 Today* programme on 26 February 2016, Lord Howard called for a pause of about a month after a vote to leave to allow the EU to reconsider the current deal: **“It is quite likely that during that month they would say let’s talk some more, let’s see if we can reach a different agreement and perhaps you could have a second referendum.”**<sup>[33]</sup>

The options on the ballot paper are clear. The policy of Vote Leave and its leading advocates is not. Are they supporting Britain actually leaving the EU? Or do they support using such a vote as pressure and leverage to achieve further concessions from the EU and public endorsement of remaining a member in a second referendum? Regardless of their true intentions, a second referendum is not on offer. It is fundamentally misleading for leading figures in Vote Leave, as senior as its campaign director and it’s leading political spokesperson, to suggest voting ‘leave’ means something different to a decision that Britain should leave the EU, or that a vote can be cast in this referendum on the basis of further chances to vote being given.

In advocating that a leave vote, from their point of view, as a means of obtaining an even better deal and maintaining a process to stay in the EU, leading figures within Vote Leave have shown that the ‘leave’ option on the ballot paper is for them only their second best option. This would clearly not adequately represent those campaigning for Britain to leave the EU, nor reflecting properly the option on the ballot paper that they seek to represent.

**[See Appendices for full list of articles featuring Vote Leave organisers and leading figures discussing their promotion of a second referendum]**

- **Opposition to Article 50**

A group campaigning for people to vote to leave the EU in the forthcoming referendum ought to be delighted at the Prime Minister’s recent confirmation, should the outcome be ‘leave’, that he will immediately invoke Article 50 of the EU treaty. This is the only established legal process for a country to leave the EU and the trigger for negotiations on a post-exit relationship.

[32] <http://www.bloomberg.com/news/articles/2016-01-21/-brexit-campaigner-cummings-pushes-plan-for-second-referendum>

[33] <http://www.theguardian.com/politics/2016/feb/26/michael-howard-eu-flawed-failing-leave-tory-danger-european-union>

Oddly, however, the Vote Leave group was far from enthused. Its campaign director Dominic Cummings instead reacted angrily to the PM's pledge, saying in an interview with *The Economist* on 21 January 2016 that invoking Article 50 in response to a 'leave' vote **"would be like putting a gun in your mouth and pulling the trigger"**.<sup>[34]</sup> He went on to say: **"There is a widespread assumption that we have to use the Article 50 process, and that has a lot of risks. That is not true. We do not have to use the Article 50 process."** The comments provoked questions as to what alternative exactly Cummings and the Vote Leave campaign he directs therefore have in mind as the consequence of a leave vote, if not triggering the only established legal process for leaving the EU?

On Twitter on 22 February 2016, Cummings continued on the theme, saying that **"Triggering A50 immediately wd be mad & won't happen. Informal talks before any legal process triggered is only rational policy"**.<sup>[35]</sup> His view appears to be that, following a leave vote, the government should not start the process of delivering the outcome people for which people had voted. This prompted Paul Waugh, executive politics editor of the *Huffington Post*, to ask Cummings whether he was running: **"Vote for Informal Talks', not 'Vote Leave'?"**<sup>[36]</sup>

Triggering Article 50 is the only established legal process for leaving the EU and therefore the only way to start the process of delivering the meaning of a 'leave' outcome. It is not clear how a group like Vote Leave purporting to campaign for Britain to leave the EU can credibly oppose it being invoked, unless their true objective is not as declared. Writing about the scenario on their blog, the EU-neutral research group Open Europe seemed to agree, saying: **"Sticking with the current arrangement, possible if Article 50 had not been triggered, would seemingly be in direct violation of the original referendum vote."**<sup>[37]</sup>

Cummings has been challenged many times on Twitter by sceptical 'leave' campaigners to state unequivocally that leave vote means in his view leaving the EU, but he studiously avoids giving a direct answer. However, he is far from the only leading figure in Vote Leave expressing opposition to invoking Article 50 should Britain vote to leave the EU and indeed Vote Leave has also made the point corporately.

Bernard Jenkin MP, a leading Conservative supporter of the group and Vote Leave board member, has also urged the Prime Minister not to "bind himself" to the framework of Article 50, saying there are other ways to leave.<sup>[38]</sup> At a recent European Council on Foreign Relations

[34] <http://www.economist.com/blogs/bagehot/2016/01/out-campaign>

[35] <https://twitter.com/odysseanproject/status/701736748989210625>

[36] <https://twitter.com/paulwaugh/status/701737558875705345>

[37] <http://openeurope.org.uk/today/blog/could-there-be-a-second-eu-referendum>

[38] <http://www.cityam.com/235149/eu-referendum-a-second-referendum-would-be-extremely-difficult-legal-expert-warns>

event, Jenkin was also reported as saying **“Legally it is just an advisory referendum – it puts the ball back into the government party’s court. [It is for them] to decide how to respond to a no-vote”**.<sup>[39]</sup> The comment implies that a leave vote doesn’t necessarily mean Britain must leave the EU; just that the government must decide what to do next.

Vote Leave have also declared their opposition as an organisation to the triggering of Article 50. Setting out their principles for a ‘new deal’ with the EU, the group says: **“We do not necessarily have to use Article 50 - we may agree with the EU another path that is in both our interests”**.<sup>[40]</sup> Yet this ignores, surely disingenuously, that Article 50 is the only legally prescribed way to begin the process of leaving the EU and of triggering discussions over a post-exit relationship between the UK and the EU. It is written into the EU treaty. Why should seeking “another path” be necessary other, than if the definition of “both our interests” was to seek to avoid leaving?

The ‘leave’ option on the ballot paper is clear. It means Britain should leave the EU. If a majority choose this option, this mandates nothing other than starting the process of exit. The only legally prescribed way to do this is to trigger Article 50 of the EU treaty. It is not credible to appoint as lead ‘leave’ campaign group an organisation that opposes this Article being triggered. The impression is that Vote Leave wish to see a ‘leave’ result in the EU referendum effectively ignored or used merely as leverage in favour of another round of negotiations with Brussels. The core purpose of the official ‘leave’ campaign, however, should be to argue for Britain to leave the EU – not to continue negotiations and hold further referendums.

- **Inconsistency of EU view**

The views of a large number of leading figures involved in Vote Leave have been vague and inconsistent on EU membership and most have only very recently decided to back a ‘leave’ vote.

Prior to launching Vote Leave, its chief executive and the company’s sole owner Matthew Elliott established Business for Britain (BfB) – a campaign for staying in a reformed EU that, according to its website even as recently as 7 September 2015, was “absolutely not about leaving the EU”.<sup>[41]</sup> Its purpose, as described in its campaign leaflet, was **“Instead of pushing the debate to the extreme corners of In vs Out, we should be having a sensible discussion about what is right and what is wrong in our current arrangements”**.<sup>[42]</sup> John Mills, the deputy chair of Vote Leave was also co-chairman of Business for Britain. Elliott and Mills, together with two other

[39] [http://www.ecfr.eu/article/commentary\\_the\\_neverendum\\_does\\_out\\_mean\\_out](http://www.ecfr.eu/article/commentary_the_neverendum_does_out_mean_out)

[40] [http://www.voteleavetakecontrol.org/briefing\\_newdeal](http://www.voteleavetakecontrol.org/briefing_newdeal)

[41] <https://web.archive.org/web/20150907201152/http://businessforbritain.org/about/>

[42] <http://forbritain.org/leaflet.pdf>

current company directors of Vote Leave Ltd Alan Halsall and Daniel Hodson, make up the four directors of Business for Britain.

Through Business for Britain, Elliott has spent the past few years arguing, pressing and calling for Britain to remain in a reformed EU. On this basis alone the idea that his latest political incarnation, Vote Leave, should be imposed as representative of those who have for all that time and much longer argued that Britain should leave the EU seems absurd.

During BfB's campaign, Elliott repeatedly talked up the government's renegotiation plans, listing very similar objectives to the Prime Minister's on *ConservativeHome* designed, in his words, to **"define what changes would make remaining 'In' a worthwhile option"**.<sup>[43]</sup> In the *Evening Standard* on 1 June 2015, Elliott was quoted as saying **"If the Government gets a two-tier Europe, we're very much in"** - which is now very similar to the Prime Minister's claim of achieving a "special status" for Britain.<sup>[44]</sup> In the *Daily Telegraph* on 3 June 2015, he said that David Cameron's renegotiation agenda **"echoes"** Business for Britain's and that the PM **"deserves our help delivering it"**.<sup>[45]</sup> Elliott's previous statements in favour of many of the changes the Prime Minister achieved in his renegotiation are already, understandably, being held up by the 'Britain Stronger in Europe' campaign as confusing conflicts with his claimed current views as Vote Leave. On 19 February 2016 the group published a range of EU changes that they claimed both Business for Britain and Vote Leave had "spent years calling for".<sup>[46]</sup>

Even prior to launching Business for Britain, Elliott has no history of calling for Britain to leave the EU. While running the Taxpayers' Alliance he was funded by his supporters to run a couple of specific, EU-critical initiatives. Yet he was also until recently a founding director of a company named The Britain-in-Europe Campaign Ltd.<sup>[47]</sup> When challenged about this, Elliott has claimed this was an attempt to 'name block' and prevent others using the company's title. Yet Elliott was not also the director of any other similarly named companies nor owner of related web addresses, actions that would support his claims. That he set up this company suggests his views on EU membership are rather more fluid and opportunistic than he is today claiming in an attempt to be designated the official EU referendum 'leave' campaign.

Elliott is far from the only prominent Vote Leave figure with a vague commitment to leaving the EU. Recent reports that Boris Johnson has decided to back leaving the EU and the Vote Leave

[43] <http://www.conservativehome.com/thinktankcentral/2015/02/matthew-elliott-the-ten-changes-we-need-in-our-relationship-with-the-eu.html>

[44] <http://www.standard.co.uk/comment/comment/isabel-oakeshott-euroscptics-need-to-wake-up-if-they-want-us-to-leave-the-eu-10289339.html>

[45] <http://www.telegraph.co.uk/news/newsttopics/eureferendum/11649893/Dont-rush-the-EU-referendum.-Real-reform-will-take-time.html>

[46] <https://twitter.com/StrongerIn/status/700820273117794305>

[47] <https://beta.companieshouse.gov.uk/company/07857196/officers>

group have been accompanied by questions as to his motivations. Speculation surrounds whether his stance is more to do with personal ambition than a convinced political view on the issue in question. Boris described his decision as involving **“a huge amount of heartache”**, indicating a certain difficulty in backing a ‘leave’ vote.<sup>[48]</sup> His decision drew the ire of David Cameron after Boris reportedly told a senior Conservative helping the prime minister to prepare for the referendum campaign as recently as a week before his announcement: **“I’m sure I will be with you.”**<sup>[49]</sup>

In February, the *Huffington Post* set out a range of conflicting reports about Boris’s views on the EU from a confession to Conservative MPs that **“The trouble is, I am not an Outer”** to his being **“well up for trying to make the positive case”** for the Single Market (to which Vote Leave are opposed).<sup>[50]</sup> This was reinforced by a comment on Twitter by his fellow MP Nicholas Soames that : **“Whatever my great friend Boris decides to do I know that he is NOT an outer.”**<sup>[51]</sup>

Speaking to the media outside his home on 21 February 2016, Johnson was equivocal about what exactly he meant by leaving the EU, saying **“I would like to see a new relationship based more on trade, on co-operation, but with much less than this supranational element, so that’s where I’m coming from”**, adding, **“I want to be in a reformed EU, and that’s my hope.”**<sup>[52]</sup> But a “reformed EU” is what the ‘remain’ side is advocating.

Writing in the *Daily Telegraph* on 22 February 2016, Boris Johnson also left his position vague. **“There is only one way to get the change we need,”** he wrote, **“and that is to vote to go, because all EU history shows that they only really listen to a population when it says No.”** He went on; **“It is time to seek a new relationship in which we manage to extricate ourselves from most of the supranational elements.”**<sup>[53]</sup> His reference to the EU ‘only really listening to a population when it says No’ is a clear reference to countries that have previously voted against an EU treaty but have then been offered a better deal and remained in the EU. It is also not clear to what the EU would need to start listening, unless a vote to ‘leave’ is not viewed as a firm decision by Boris.

This inconsistency problem goes far wider than just Vote Leave’s chief executive and its leading political figure. As described previously, in Section 1, many Conservative MPs backing Vote

[48] <http://www.theguardian.com/politics/2016/feb/21/boris-johnson-joins-campaign-to-leave-eu>

[49] <http://www.theguardian.com/politics/2016/feb/22/david-cameron-ridicules-boris-johnsons-second-referendum-idea>

[50] [http://www.huffingtonpost.co.uk/2016/02/21/boris-johnson-eu-brexit-supports\\_n\\_9286400.html?1456083280](http://www.huffingtonpost.co.uk/2016/02/21/boris-johnson-eu-brexit-supports_n_9286400.html?1456083280)

[51] <https://twitter.com/nsoamesmp/status/701375515219902465>

[52] <http://www.breitbart.com/london/2016/02/22/boris-vote-out-but-dont-actually-leave-the-establishment-strategy-to-keep-us-in-a-reformed-eu/>

[53] <http://www.telegraph.co.uk/news/newstopics/eureferendum/12167643/Boris-Johnson-there-is-only-one-way-to-get-the-change-we-want-vote-to-leave-the-EU.html>

Leave decided only in February this year to support Britain leaving the EU. Additionally, the group's biggest reported donor to the tune of £1 million, Peter Cruddas, has admitted to having been a supporter of Business for New Europe, well known in political circles as a pro-EU group posturing as wanting EU reform.<sup>[54]</sup>

On this basis it is far from beyond the bounds of possibility that, should the return of extra powers be promised at the height of the referendum campaign, as with the Scottish referendum 'vow', or new legislation or treaty change suddenly be offered, those with such finely balanced views could potentially with greater ease switch back to support the 'in' campaign, causing chaos in the referendum debate. Amid reports of up to 40 new peerages to be awarded by the Prime Minister after the referendum, there will be considerable temptation for those with flexible views to switch sides.<sup>[55]</sup> Appointing such people as leading 'leave' advocates could easily turn out to look decidedly ill-judged.

## **Conclusion**

**The vague objectives and inconsistent record on leaving the EU of many senior figures within Vote Leave, from its founding organisers to its most prominent political backers and funders, indicates that this group cannot be considered seriously to be appointed as official advocates of the 'leave' outcome over the top of many well-established and longer-standing organisations advocating this view.**

**The picture is of a chief executive whose support for leaving the EU is not principled but at best wafer thin, backed largely by people who have only recently decided to support the 'leave' point of view, some having overtly backed a pro-EU position until very recently. How robustly 'leave' views are now held by these leading Vote Leave figures must be questioned, especially given they wish to represent a significant existing, far longer-standing movement of 'leave' campaigners in the referendum.**

**The commitment to leaving the EU of Vote Leave's leading political figure, Boris Johnson, seems particularly unclear. For Boris, the idea of leaving appears to mean staying "in a reformed EU", to make the EU "really listen" to demands for reform and Britain only being extricated from "most of the supranational elements". Vote Leave's chief executive, Matthew Elliott, has no history of calling for Britain to leave the EU. His previous enterprise, Business for Britain, was an overtly pro-EU campaign, calling the idea of leaving an "extreme corner" of the debate. Even his peripheral activity in support of an EU referendum was conducted subsequently to David Cameron's pledge to hold an EU vote, when campaigns normally precede policy change rather than follow it.**

**Most worrying of all, the only legal scenario in which Britain leaves the EU is by triggering Article 50 of**

[54] <http://order-order.com/2015/10/16/cruddas-quits-in-group>

[55] <http://www.thetimes.co.uk/tto/news/politics/article4699997.ece>

the EU treaty, but Vote Leave's campaign director Dominic Cummings has said that would be "mad". The organisation has stated that it supports "another path" that, tellingly, it doesn't define. Opposition to triggering Article 50, as is Vote Leave's position, indicates no intention to leave the EU, but rather to leave the door open for further negotiations and to attempting to then reverse a leave vote.

The more that is read about Vote Leave, the more it appears to be a vehicle merely to use the EU referendum to continue pursuit of the renegotiation / reform and 'in' objectives initiated by its chief executive's predecessor campaign Business for Britain.

### 3. Disregard for the referendum rules

- **Plans to break spending limits**

On 17 February 2016, *The Times* reported under the headline “Brexit group’s plot to break campaign spending limit” plans being made by Vote Leave to get around the £7m referendum spending limit by which it would have to abide if the group were designated as the official ‘leave’ campaign.<sup>[56]</sup> The report quoted leading figure Steve Baker MP – co-chair of Vote Leave off-shoot Conservatives for Britain – claiming that the group had devised a way **“to spend as much money as is necessary to win”** by creating a series of front organisations. The leaked email, written by Baker, talked of an intention to **“create separate legal entities”** that would each enjoy distinct, additional spending limits. The report went on to quote Jolyon Maugham QC, one of Britain’s leading barristers, who said that what Mr Baker was proposing **“would likely amount to a criminal offence.”** The political news website *PoliticsHome* reported that a Labour MP had reported Vote Leave to the police over the plans revealed by Baker.<sup>[57]</sup> It is not known whether Vote Leave is currently under investigation by the police in respect of this matter.

- **“Nasty” and deceptive campaigning**

In November 2015, Vote Leave was criticised by the Conservative MP and former minister Eric Pickles following a stunt that disrupted the CBI’s annual conference.<sup>[58]</sup> Vote Leave arranged for two student supporters to make a protest during the Prime Minister’s speech, gaining access under false pretences. The campaign set up a fake company in order to apply for entry and the students unfurled a banner and chanted its slogan. According to reports, David Cameron tried to reason with the students and asked them to sit down, but they had to be led away by security.

In complaint, Pickles wrote: **“I believe the actions of Vote Leave in disrupting the CBI conference and declaring a strategy of intimidation and protest disqualify Vote Leave from being a designated lead campaigner in the forthcoming EU referendum campaign”**. However Vote Leave campaign director Dominic Cummings defended the action, telling the *Daily Telegraph*: **“You think it is nasty? You ain’t seen nothing yet.”** He went on to suggest such tactics would continue, saying: **“We are going to be tough about exposing the failure of the**

[56] <http://www.thetimes.co.uk/tto/news/politics/article4692310.ece>

[57] <https://www.politicshome.com/party-politics/articles/story/vote-leave-reported-police-over-front-campaigns-email>

[58] <http://www.theguardian.com/politics/2015/nov/11/eric-pickles-says-vote-leave-campaign-should-be-denied-lead-status>

**Establishment – they can bleat that it is nasty because they don’t like scrutiny. It is going to be tough.”<sup>[59]</sup>**

The episode shows that the culture of Vote Leave, led from the top, is one lacking in respect for their opponents and intent on using false pretences to disrupt their opponents’ activities, rather than focus on making their own case for the outcome they support.

- **Pre-judging designation decision**

On 3 March 2016 *The Guardian* reported that Vote Leave campaign director Dominic Cummings has written to advertising agencies already claiming to be the “official” EU referendum ‘leave’ campaign, even though a decision has yet to be taken.<sup>[60]</sup> In an email to agencies, Cummings wrote: **“Hello. I’m campaign director of Vote Leave. We will be the official leave campaign in the imminent referendum. We need an agency to help us spend 7 million quid. If interested could we talk asap?...”** *The Guardian* confirmed the authenticity of the email with Vote Leave.

[59] <http://www.telegraph.co.uk/news/politics/11984824/EU-referendum-campaign-is-about-to-get-nasty-say-Eurosceptic-campaigners.html>

[60] <http://www.theguardian.com/politics/2016/mar/03/vote-leave-says-it-will-be-official-brexiteer-campaign-in-referendum>

## 4. Proper use of public money (financial probity)

- **Charity tax questions**

On 12 December 2015, an article appeared in the *Observer* newspaper drawing attention to how a charity called the Politics and Economics Research Trust (PERT) – originally founded in 2006 as the “Taxpayers’ Alliance Research Trust” by Matthew Elliott and other co-founders of the Taxpayers’ Alliance <sup>[61]</sup> - has been consistently and almost exclusively funding Elliott’s political campaigns with annual six-figure grants.<sup>[62]</sup>

Two campaigns founded and run by Elliott, the Taxpayers’ Alliance (TPA) and Business for Britain (BfB), have year-after-year received the overwhelming majority of the charity’s grants. These grants benefit from tax breaks and tens of thousands of pounds in reclaimed gift aid on charitable donations to which those campaigns would not otherwise have been entitled had donations been made to them directly.

PERT gave an astonishing 95% of its grants to the TPA and BfB in 2014 – over half a million pounds – following giving 97% of its grants to the same two organisations in 2013, in that year claiming £58,283 in ‘recovered tax’, amounts noted in previous years’ accounts as “gift aid income”. Proportions handed to the TPA of PERT’s total grants during earlier years were 87% in 2012, 91% in 2011, 100% in 2010 and 87% in 2009.<sup>[63]</sup>

An earlier 2011 article in the *Guardian* had revealed that potential donors had been asked to give to the charity as a way of funding the Taxpayers’ Alliance with the benefit of gift aid.<sup>[64]</sup> David Wall, secretary of the business pressure group the Midlands Industrial Council, told the *Guardian* **"We were asked for funding to the charity which means they can benefit from gift aid. I know that some industrialists made donations through the charitable arm."** Following a resulting Charity Commission investigation at that time, the charity received a warning from the Commission for operating in this way.

The evidence strongly suggests that the charity has been used improperly as a means to gain financial benefit for Matthew Elliott’s political campaigns from the favourable tax treatment of

[61] <https://beta.companieshouse.gov.uk/company/05982645/officers>

[62] <http://www.theguardian.com/society/2015/dec/12/charity-donations-funding-eu-brexite-politics-economics-research-trust>

[63] <http://apps.charitycommission.gov.uk/Showcharity/RegisterOfCharities/FinancialHistory.aspx?RegisteredCharityNumber=121849&SubsidiaryNumber=0>

[64] <http://www.theguardian.com/society/2011/feb/23/charity-commissioners-taxpayers-alliance-donation>

charitable donations – particularly hypocritical of Matthew Elliott and the Taxpayers’ Alliance. As an apparent abuse of charitable rules, the recent *Observer* article reported a Charity Commission spokesperson saying: **“We are aware of concerns concerning the charity the Politics and Economics Research Trust and are currently assessing those concerns to determine what if any regulatory action may be required.”**

That assessment is on-going and its outcome could embroil leading Vote Leave individuals Matthew Elliott, John Mills as a trustee of PERT and deputy chairman of Vote Leave, and potentially reported donors to the charity like Vote Leave backer Peter Cruddas, in severe criticism if not legal action.

Further, it is unknown whether any other agencies are investigating the circumstances around the operation of this charity. Given the tax implications of the set-up, the scale of the money involved and the publicity it has received, it would be surprising if HMRC were not also taking an interest.

It also isn’t yet known whether the charity is currently being used as a fundraising vehicle to provide ‘research grants’ to Vote Leave in a similarly dubious way as for the Taxpayers’ Alliance and Business for Britain. The prospect heightens the potential for a referendum campaign managed by these individuals to be discredited and diverted from the issues at stake.

Should this be the case, or should Matthew Elliott be the chief executive of the official EU referendum ‘leave’ campaign at the time the Charity Commission investigation concludes, or at the time an HMRC investigation becomes public, there is a considerable risk that such dubious and hypocritical financial activities will become a prominent topic of debate, distracting from the real issues at stake in the referendum vote.

- **Mis-filing of company accounts**

Prior to launching Vote Leave, Matthew Elliott established and appointed himself chief executive of Business for Britain. The company behind the campaign has a questionable financial background.

Business for Britain Ltd in September 2015 had to file special 'amended' accounts with Companies House, having in November 2014 filed accounts declaring itself financially dormant in its first year.<sup>[65]</sup> This was dubious because, since its launch in April 2013, Business for Britain was evidently very active. It had a website, claimed to have staff, published reports, held events, was fundraising and conducting media activities.

[65] <https://beta.companieshouse.gov.uk/company/08411261/filing-history>

For example, the first entry on Business for Britain's media page is dated 1 November 2013 and refers to "Business for Britain research" conducted by YouGov, for which YouGov must have been paid.<sup>[66]</sup> But by who, if its client was supposedly dormant, as later declared? There are numerous other subsequent entries referring to further research and activities all prior to the 'made up to' date of the dormant accounts of 28 February 2014. A basic Google News search between the dates of 1 February 2013 and 28 February 2014 reveals many pages of hits referring to Business for Britain and often quoting spokespeople, who claimed to be employees. Similarly, a search of the Business for Britain twitter account over the same period reveals a huge amount of activity, including mention of staff and many activities that must have required some financial expense that is simply not consistent with Business for Britain Ltd being 'dormant'.<sup>[67]</sup>

That dormancy had been claimed falsely, for reasons unknown, was confirmed when the charity the Politics and Economics Research Trust, discussed above, listed in its 2013 accounts that it had in that year made two grants to Business for Britain totalling £115,000.<sup>[68]</sup> **Somehow this huge sum of income, at least, had been 'overlooked' when Matthew Elliott signed and filed the original dormant accounts covering Business for Britain's activities to February 2014.** Two other current directors of Vote Leave Ltd in addition to Elliott – Daniel Hodson and Alan Halsall – were also directors of Business for Britain at the time these accounts were filed. This Vote Leave trio made up three of the four directors in total of Business for Britain Ltd.

Filing accounts knowingly that do not represent accurately the position of a company is an offence under Section 414(4) of the Companies Act 2006. The director who signed those dormant accounts in November 2014, Matthew Elliott, must have known that those accounts did not comply, and the other directors of Business for Britain Ltd – now also directors of Vote Leave Ltd - must have failed to take reasonable steps to ensure compliance or prevent the dormant accounts being approved.

We understand that complaints have been made to Companies House about this Business for Britain Ltd activity. The intended actions of Companies House are unknown. An investigation may well be on-going.

Elliott has never explained how, or why, he 'overlooked' £115,000 in grants, not to mention other evident Business for Britain activity, and filed dormant accounts for his company.

[66] <http://businessforbritain.org/media/page/2/>

[67] <https://twitter.com/search?q=from%3Aforbritain%20since%3A2013-02-01%20until%3A2014-2-28&src=typd&lang=en>

[68] [http://apps.charitycommission.gov.uk/Accounts/Ends49%5C0001121849\\_AC\\_20131231\\_E\\_C.pdf](http://apps.charitycommission.gov.uk/Accounts/Ends49%5C0001121849_AC_20131231_E_C.pdf)

- **Financial propriety questions**

Vote Leave's chief executive Matthew Elliott launched his previous organisation Business for Britain (BfB) in April 2013. Until 26 June 2014 he was also a shareholder in WESS Digital Ltd (see Section 5, 'Conflict of interest', below). On its website, until suddenly deleted recently, WESS Digital claimed Matthew Elliott's organisations Business for Britain and the Taxpayers' Alliance as clients for its digital marketing activities. This raised questions as to whether such contracts had been awarded properly by Matthew Elliott, as chief executive of Business for Britain, to this company in which he, at the time, held a personal commercial interest. The details of the services supplied by WESS to Business for Britain and the Taxpayers' Alliance are unknown, being hidden behind private contracts. How much these contracts were worth and to what extent Elliott benefitted financially from directing BfB's finances this way are also unknown.

Similar questions arose during the No2AV referendum campaign, which was also run by Elliott. Questions were raised around the propriety of No2AV awarding a large advertising and 'digital agency' contract to MessageSpace, in which No2AV's digital director Jag Singh had an interest. Financial submissions of the No2AV campaign showed that contract to be worth over £65,000. More recently, Singh was a founding partner director with Matthew Elliott in WESS Digital Ltd.

### **Conclusion**

**The evidence of Matthew Elliott's previous financial activities do not reflect well on his personal probity nor, therefore, do they recommend that he is an appropriate figure to have sole ultimate authority over the receipt and spending of £600,000 of public money.**

**There are various questions over possibly improper financial conduct that must be clarified before Vote Leave Ltd, with Matthew Elliott as the company's ultimate authority, can contend credibly for official designation and £600,000 of public money or the judgement and competence of those granting such status and an award will inevitably be drawn significantly into question.**

**There is no reason to suggest that Vote Leave will be managed any differently to Elliott's other, previous political campaigns, which are surrounded by financial questions.**

**Further, there is also a distinct danger based on his financial activities that, should Matthew Elliott be the chief executive or have a leading role in the official EU referendum 'leave' campaign and his previous financial activities emerge during the debate, as some aspects already have, the referendum debate will be distracted from the key issues at stake in the vote and will instead become about the personal financial failings of prominent individuals.**

## 5. Conflict of interest

- **Data marketing**

In March 2013, at around the same time as developing an interest in the EU issue following the Prime Minister's pledge to hold a referendum, it was reported in *PR Week* that Matthew Elliott and three colleagues – Andrew Whitehurst, Jag Singh and Paul Staines - had established a company to profit from marketing data on the supporters of single issue campaigns.<sup>[69]</sup>

According to the article, their commercial aim was to market online campaign tools to campaign groups and political parties based on a large database storing details of how people had interacted with political campaigns.

The move raised moral questions for Elliott around seeking to profit personally by marketing data assets generated by his donor-funded, purportedly non-profit campaign activities. Revealingly, such questions evidently didn't occur to Elliott, or were ignored, when establishing WESS Digital.

Elliott resigned as a director of WESS Digital in June 2014, strangely only just over a year after its formation.<sup>[70]</sup> Yet, for over a year after his resignation, he still described himself as working at WESS Digital on his Facebook profile and included its logo on his Twitter profile. The company's only remaining director, Andy Whitehurst, is according to a *Huffington Post* report from November 2015, currently working for Vote Leave as a 'digital consultant'.<sup>[71]</sup> His precise role in the management of Vote Leave's digital activities and data is unknown.

There is an evident risk that Matthew Elliott, together with his Vote Leave colleague Andy Whitehurst, has retained an interest in profiting personally from the marketing of data on supporters of single issue campaigns. Clearly a referendum is a large opportunity for data gathering and it may be that Elliott's interest in forming the official 'leave' campaign, having no prior interest in anti-EU campaigning as has been previously established, is still motivated primarily by this commercial, profit-driven goal.

Within this lies significant risk of a major conflict of interest. If the campaign Elliott seeks to represent wins, Britain leaves the EU, and data on anti-EU supporters will be of little value to political parties at a future election. Those people will have got what they wanted. Only if the 'leave' campaign loses might political parties wish to find out about and appeal to those who held an anti-EU view during the referendum debate.

[69] <http://www.prweek.com/article/1174611/campaigners-target-political-parties-ambitious-data-plans>

[70] <https://beta.companieshouse.gov.uk/company/08261511/filing-history>

[71] [http://www.huffingtonpost.co.uk/2015/11/30/vote-leave-eu-referendum-brexiteu\\_n\\_8680648.html](http://www.huffingtonpost.co.uk/2015/11/30/vote-leave-eu-referendum-brexiteu_n_8680648.html)

- **Downing Street links**

On 19 April 2012 it was reported by the *Daily Telegraph* that Matthew Elliott was being considered for a job in Downing Street.<sup>[72]</sup> More recently, in November 2015, author of an unauthorised biography of the Prime Minister Isabel Oakeshott wrote on the *ConservativeHome* blog that Elliott was so close to getting that job that he was even “shown his future desk”.<sup>[73]</sup>

The circumstances around why Elliott did not get that job are unclear. What is known is that his next political act was to establish Business for Britain, an organisation that at that time claimed to support the Prime Minister’s objectives for a renegotiation of Britain’s membership of the EU and to remain in. In February 2015, the political editor of the *Sunday Times*, Tim Shipman, reported that the Prime Minister’s special adviser Daniel Korski had been **“in regular contact with senior figures in European pressure groups who would lead the “In” and “Out” referendum campaigns — as often as two or three times a day”**, going on to name Business for Britain as he ‘out’ campaign in question.<sup>[74]</sup> This raised the question of why Downing Street should be briefing its purported opponents. It is not known whether, or how frequently, Daniel Korski has since been in contact with Matthew Elliott.

On 20 February 2016, *The Times* reported that Downing Street was endorsing Vote Leave, telling ministers who wished to campaign for ‘leave’ to support Vote Leave rather than a rival group.<sup>[75]</sup> The report quoted a No.10 source saying: **“It is the more comfortable place ... For those that want to go out, backing Vote Leave is the logical thing to do.”** It is extremely odd for Downing Street to be prescribing which ‘leave’ campaign it prefers and raises significant questions for ‘leave’ campaigners, along with other evidence of links, that No.10 finds Vote Leave the “more comfortable place”.

## Conclusion

**Through his interest in political data marketing for personal profit, which it would be a big stretch of imagination to assume he has in reality so soon dropped, the evidence suggests a strong risk that Matthew Elliott may personally for reasons of greater financial profit in the future not be especially motivated to represent the ‘leave’ outcome to the greatest possible extent.**

**The evidence also suggests a strong and disturbing link between Matthew Elliott / Vote Leave and Downing Street, the chief opponent of the referendum outcome he seeks to represent. Bearing in mind Elliott’s lack of history in campaigning against EU membership and his prior link to a**

[72] <http://www.telegraph.co.uk/news/politics/david-cameron/9214153/No-10-ponders-job-for-TPAs-Matthew-Elliott.html>

[73] <http://www.conservativehome.com/platform/2015/11/isabel-oakeshott-brexiteers-dont-know-friend-from-enemy.html>

[74] <http://www.thesundaytimes.co.uk/sto/news/Politics/article1516693.ece>

[75] <http://www.thetimes.co.uk/tto/news/politics/article4695289.ece>

**Downing Street job, there is a big question as to the extent of Elliott's commitment to this outcome over and above his current links or desired future connections with Downing Street.**

**In both cases, there are strong indications of personal interest on the part of the chief executive and ultimate owner of Vote Leave that represent a potential compromise and conflict of interest with his claimed wish to represent the 'leave' campaigners in the EU referendum.**

## 6. Lack of campaigning credibility / capacity to deliver a credible campaign

- **No2AV**

Matthew Elliott's claimed qualification to run the EU referendum 'leave' campaign rests largely on his responsibility for the No2AV campaign during the 2011 referendum on the Alternative Vote. However, despite the headline success of the campaign, No2AV's launch was ridiculed when, during an "uncomfortable" press conference, Elliott got into an argument with one of his major supporters on the platform over refusing to reveal the names of his donors.<sup>[76] [77]</sup> No2AV's key messages on the costs of changing the voting system were widely derided. It's campaign posters and media adverts on the costs of changing to the Alternative Vote system, for example featuring a sick baby, were reported to the Advertising Standards Authority on the grounds that they were "deeply dishonest".<sup>[78]</sup>

Reports circulated during the closing stages of the referendum campaign that, in frustration at the polls, the Prime Minister sent in his campaign team to take over and sideline Elliott's gaffe-prone management.<sup>[79] [80]</sup>

Subsequently, leading figures in the No2AV campaign have written about its chaotic organisation and its struggles to overcome Elliott's divisive effect on the Labour side of the campaign.<sup>[81] [82]</sup>

**An effective EU referendum debate and vote that will settle the issue requires credible, competent and committed campaigners to put the case on both sides.**

- **Incompetence**

Vote Leave has already been responsible for a number of basic political gaffes that have caused embarrassment to leave campaigners. The mistakes that have been made are so basic as to raise questions about the genuine enthusiasm and commitment of those involved in the group to properly represent the 'leave' point of view.

[76] <http://www.dailymail.co.uk/debate/article-1357396/Robert-Winstons-Groucho-Marx-muzzer-Hes-Colin-Firth.html>

[77] <http://www.independent.co.uk/news/uk/politics/no2av-campaigners-refuse-to-publish-donor-details-2215747.html>

[78] <http://www.independent.co.uk/news/uk/politics/campaign-for-voting-reform-turns-nasty-2223930.html>

[79] <http://leftfootforward.org/2011/01/no2av-charlotte-vere-takes-charge/>

[80] <http://leftfootforward.org/2011/02/another-gaffe-for-no2av-campaign/>

[81] <http://www.newstatesman.com/blogs/dan-hodges/2011/05/campaign-clegg-labour-cameron>

[82] <http://peterbotting.co.uk/clients-case-studies/no-to-av-referendum-campaign-no2av/>

In September 2015, *The Independent* revealed that the website for the purportedly independent and Labour-run group 'Labour for Britain' had in fact been registered by Matthew Elliott at the 55 Tufton Street office address of the Taxpayers' Alliance and Business for Britain.<sup>[83]</sup> At that time Elliott was chief executive of Business of Britain and known through his involvement in founding and running the Taxpayers' Alliance as a right-wing campaigner. This completely undermined the credentials of the Labour MPs and other supporters of the group such that it was shortly afterwards renamed 'Labour Leave'.

However, for the Labour Leave website, exactly the same politically compromising mistake was made again. As *Buzzfeed* reported on 21 January 2016, "**Dominic Cummings, a former Tory director of strategy, is the registered owner of LabourLeave.org, the website for the apparently independent left-wing campaign group urging Labour supporters to vote to leave the EU.**"<sup>[84]</sup> Yet more embarrassment was caused to Labour eurosceptics and their organisation.

In December 2015, Vote Leave released research purporting to show that the costs of EU membership outweigh the benefits. The research was reported prominently by the *Daily Telegraph*.<sup>[85]</sup> It was based on the claim that UK contributions to the EU budget and single market regulations cost the UK £41billion, whereas the European Commission's own figures suggested that the benefits of the single market are equivalent to £37billion. The conclusion was that the balance was £4bn in favour of leaving. However, the research was flawed in a very basic way that completely undermined Vote Leave's case and shot 'leave' campaigners in the foot. As the *Daily Telegraph* report explains, Vote Leave used the gross figures to calculate Britain's contributions to the EU budget. Yet around £9.5bn of that total either is never sent to the EU in the first place (£5bn rebate) or comes back to the UK in the form of grants (£4.5bn). That simple error reversed the conclusions of the research to show a £5.5bn advantage in favour of EU membership – a monumental gaffe for a group purporting to back a 'leave' vote.

Vote Leave's most recent gaffe came earlier this month, when it was threatened with legal action for using the NHS logo on their leaflets. Using a logo on publicity material is, as most professionals know, a move that requires great care to ensure proper permission is obtained from the copyright and/or trademark owner. It is basic campaign propriety, yet Vote Leave organisers took no such steps. According to *The Observer* on 6 March, even a legal letter warning Vote Leave to stop using the logo "was ignored".<sup>[86]</sup>

[83] <http://www.independent.co.uk/news/uk/politics/eu-referendum-eurosceptic-labour-group-accused-of-being-a-front-for-exit-campaign-10493998.html>

[84] <http://www.buzzfeed.com/jimwaterson/labour-leave-website>

[85] <http://www.telegraph.co.uk/news/newstopping/eureferendum/12072128/Costs-of-EU-membership-outweigh-benefits.html>

[86] <http://www.theguardian.com/politics/2016/mar/05/vote-leave-threatened-over-use-of-nhs-logo>

## **Conclusion**

**These are just a few examples. But as very basic errors that directly undermine 'leave' campaigners, they reveal that Vote Leave organisers have neither the proper level of interest in attention to detail nor the professional approach to proper operational norms to represent properly and effectively the 'leave' side in the EU referendum.**

# APPENDICES

1. Details of the 'For Britain' themed groups / websites
2. Media coverage and Vote Leave statements on a 'second referendum'

## 1. Details of the 'for Britain' themed groups / websites

Group	Nameservers	Registrant	Hosting & IP Addr	Date Regist'd
<b>Vote Leave</b> (VoteLeave.UK) Forwards to VoteLeaveTakecontrol.org Details as below	dnsimple.com	Enom Dominic Cummings Westminster Tower	ServerCentral 50.31.225.93	19/9/2015
<b>VoteLeave</b> (VoteLeaveTakeControl.org) Westminster Tower, 3 Albert Embankment, London SE1 7SP Main: 020 7952 5454 / Press: 020 7952 5440, 07901 334 667	dnsimple.com	Enom Dominic Cummings Westminster Tower	ServerCentral 50.31.225.93	29/9/2015
<b>For Britain</b> (forBritain.org) Host site for the first six groups listed below: ICO registration: Westminster Tower, 3 Albert Embankment, SE1 7SP	dnsimple.com	Tucows Contact privacy purchased	Rackspace 95.138.171.9	19/10/2012
<b>Business for Britain</b> (businessforbritain.org) Also accessible via: forbritain.org/business 7 <sup>th</sup> Floor, Westminster Tower, London SE1 7SP Main: 020 7952 5454 / Press: 07901 334 667 Previously: 55 Tufton Street, London SW1P 3QL	dnsimple.com	Tucows Contact privacy purchased. Original registrant: Matthew Elliott	Rackspace 95.138.171.9	19/10/2012
<b>Conservatives for Britain</b> (conservativesforbritain.org) Also accessible via: forbritain.org/conservatives Address not given. ICO registration at: Westminster Tower Tel: 020 7952 5482 / Press by Vote Leave 020 7952 5440	dnsimple.com	Mesh Digital Michael Dowsett, Westminster Tower michael.dowsett@forbritain.org Original registrant: Matthew Elliott	Rackspace 95.138.171.9	27/11/2012
<b>Labour for Britain</b> (labourforbritain.org) Also accessible via: forbritain.org/labour Address not given. ICO registration at: 72 Albert St, London (address of John Mills, deputy chair of Vote Leave). Company registered address changed on 3-Nov-14 from 55 Tufton Street. LabourforBritain.co.uk still registered to Matthew Elliott	dnsimple.com	Mesh Digital Brendan Chilton JML House (John Mills Limited) brendan.chilton@labourforbritain.org Original registrant: Matthew Elliott	Rackspace 95.138.171.9	27/11/2012
<b>Historians for Britain</b> (historiansforbritain.org) Also accessible via: forbritain.org/historians 55 Tufton Street, London SW1P 3QL Tel: 0207 340 6070 Media: <b>07901 334 667</b> E: oliver.lewis@forbritain.org	dnsimple.com	Mesh Digital Olimpia Ades, Business for Britain 55 Tufton St olimpia.ades@forbritain.org	Rackspace 95.138.171.9	9/2/2015
<b>Economists for Britain</b> (forbritain.org/economists) 55 Tufton Street, London, SW1P 3QL Tel: 020 7340 6070 Media: <b>07901 334 667</b> E: oliver.lewis@voteleave.uk	dnsimple.com	Mesh Digital Matthew Elliott 55 Tufton St matthew@businessforbritain.org	Hosted via forBritain.org	9/7/2015

<b>Students for Britain</b> (studentsforbritain.org) Also accessible via: forbritain.org/students Address not given	dnsimple.com	Tucows Contact privacy purchased	Rackspace 95.138.171.9	19/10/2012
<b>Christians for Britain</b> (christiansforbritain.org) Address not given	1and1-dns	1&1 Internet Adrian Hilton Farnham Common	1&1 Internet 82.165.30.1	28/8/2015
9 September 2015 - Embarrassing media coverage exposes <b>Labour for Britain's</b> links to Matthew Elliott and the Taxpayers' Alliance through his initial registration of their web address: <a href="http://www.independent.co.uk/news/uk/politics/eu-referendum-eurosceptic-labour-group-accused-of-being-a-front-for-exit-campaign-10493998.html">http://www.independent.co.uk/news/uk/politics/eu-referendum-eurosceptic-labour-group-accused-of-being-a-front-for-exit-campaign-10493998.html</a>				
<b>Lawyers for Britain</b> (lawyersforbritain.org) Address not given	Plusnet	Enom Martin Howe, New Sq, Lincoln's Inn	Plusnet 212.159.9.91	23/9/2015
<b>Women for Britain</b> (womenforbritain.org) Address not given	Wordpress	Enom Contact privacy purchased	Automattic 192.0.78.24	4/10/2015
<b>Muslims for Britain</b> (muslimsforbritain.org) Address not given	Wordpress	Enom Contact privacy purchased	Automattic 192.0.78.25	4/10/2015
<b>Bangladesh for Britain</b> (bangladesh4britain.org) Address not given	123-reg	Mesh Digital Abdus Hamid, St Albans abdus.hamid@cfob.co.uk	Webfusion 81.21.76.62	9/10/2015

**The following further groups just have an online presence on social media:**

Farmers for Britain, Veterans for Britain, Scientists for Britain, Vapers for Britain, Software Engineers for Britain, Indians4Britain, Africans for Britain, Aussies for Britain, Europeans for Britain, City for Britain, Pets for Britain.

**These further 20 'for Britain' web addresses are all associated with the email address 'matthew@taxpayersalliance.com', belonging to Vote Leave chief executive Matthew Elliott:** ScotlandforBritain.com/.org, WalesforBritain.com/.org, GreensforBritain.com/.org, LibDemsforBritain.com/.org, UKIPforBritain.com/.org, VoteforBritain.com/.org, TaxpayersforBritain.com/.org, BikersforBritain.com/.org, WinningforBritain.com/.org, AllforBritain.com/.org

Source: [https://whoisology.com/email/archive\\_12/matthew@taxpayersalliance.com/1](https://whoisology.com/email/archive_12/matthew@taxpayersalliance.com/1)

## NOTES:

- Links between the range of ‘for Britain’ groups and Vote Leave are clear and extensive. The data in the above table shows that Vote Leave, Business for Britain, Conservatives, Labour, Students, Historians and Economists for Britain are all essentially part of the same organisation. These groups appear designed to create the impression that Vote Leave is an umbrella of various interest groups and enjoys a breath of support, when in reality the source of the groups is all the same.
- All the first six groups listed – Business, Conservatives, Labour, Historians, Economists and Students for Britain – share website hosting, addresses, phone numbers and/or styles of website. For Britain / Business for Britain were the first registered, of which Vote Leave chief executive Matthew Elliott was at the time chief executive. The IP address 95.138.171.9 to which the web addresses of all these groups resolve is that of ForBritain.org, registered at the same time as BusinessforBritain.org. This shows that all the websites for these groups are being managed together. The Information Commissioner’s Office (ICO) registration for For Britain Ltd shows the same Westminster Tower address as Vote Leave and also lists under ‘Other Names’ Economists, Students and Historians for Britain.<sup>[1]</sup> Additionally, the ICO registration for Conservatives for Britain shows the group as also based at Vote Leave’s Westminster Tower address.<sup>[2]</sup> For the groups Historians for Britain and Economists for Britain, the same person is given as the contact (Oliver Lewis), but for one his email is at ‘forbritain.org’ and for the other at ‘voteleave.uk’. On Twitter, Oliver Lewis describes himself as “working for @vote\_leave”.<sup>[3]</sup> Vote Leave, Business for Britain, Historians for Britain and Economists for Britain all share the same media phone number, plus Conservatives for Britain says that media enquirers should “contact the Vote Leave press team”.<sup>[4]</sup>  
[1] <https://ico.org.uk/ESDWebPages/DoSearch?reg=633787> [2] <https://ico.org.uk/ESDWebPages/DoSearch?reg=632676>  
[3] [https://twitter.com/Oliver\\_A\\_Lewis](https://twitter.com/Oliver_A_Lewis) [4] <http://conservativesforbritain.org/contact/>
- Following the coverage in *The Independent* linking Labour for Britain with Matthew Elliott and the Taxpayers’ Alliance, the registration and hosting details of further ‘for Britain’ groups becomes more disparate. However, the fact that a further 20 ‘for Britain’ web addresses can be linked with Vote Leave chief executive Matthew Elliott continues to show his role in establishing these groups. Notably, 18 of these further web addresses were registered on the same day as those of Conservatives for Britain and Labour for Britain. All were registered by Elliott using Mesh Digital / 123-reg, as used for various other ‘forBritain’ websites.
- Conservative links: The registrant of **ChristiansforBritain.org**, Adrian Hilton, is a Conservative-supporting academic.<sup>[5]</sup> The registrant of **Bangladesh4Britain.org**, Abdus Hamid, did so using a Conservative Friends of Bangladesh email address.<sup>[6]</sup>  
[5] <http://www.adrianhilton.com/index.php/sample-page/> [6] <http://www.cfob.co.uk/>

- The groups Women for Britain and Muslims for Britain were registered at the same time, just after midnight, just eight seconds apart, were registered with the same company and have identical hosting, nameservers and MX (email management) records.<sup>[7]</sup> Although no contact details are given and web address registration details are hidden, they have clearly both been registered by the same source.  
[7] <http://www.MXtoolbox.com>
  - In a *Daily Express* report of 28 February 2016, the group Veterans for Britain was described as “an offshoot of Vote Leave”.<sup>[8]</sup>  
[8] <http://www.express.co.uk/news/politics/648080/Veterans-For-Britain-campaign-Britain-quit-EU-better-future>
  - **Conflict of interest:** The website for WESS Digital Ltd, the political data marketing company founded by Vote Leave chief executive Matthew Elliott and three colleagues, was registered on 4 October 2012, just 15 days before the initial ‘forBritain / Business for Britain’ web addresses. This indicates that the genesis of both projects was around the same time. WESS Digital received coverage in *PR Week* on 14 March 2013 about its plans to market commercially data on supporters of single-issue political campaigns.<sup>[9]</sup> WESSdigital.com is associated with the same registration company, hosting provider and distinct nameservers as the ‘forBritain.org’ and ‘BusinessforBritain.org’ web addresses. WESSdigital.com also shares hosting and distinct nameservers with the other ‘forBritain’ groups Conservatives, Labour, Historians, Economists and Students for Britain. The indication from this data that WESS Digital has a role in managing all these forBritain group websites is reinforced by a *Huffington Post* report that the sole current director of WESS Digital Ltd, Andy Whitehurst, is indeed currently working for Vote Leave as a ‘digital consultant’.<sup>[10]</sup>  
[9] <http://www.prweek.com/article/1174611/campaigners-target-political-parties-ambitious-data-plans>  
[10] [http://www.huffingtonpost.co.uk/2015/11/30/vote-leave-eu-referendum-brex-it\\_n\\_8680648.html](http://www.huffingtonpost.co.uk/2015/11/30/vote-leave-eu-referendum-brex-it_n_8680648.html)
  - The Vote Leave website addresses registered in September 2015 are also associated with the same distinct nameservers as the first six listed ‘forBritain’ groups and WESSdigital.com, despite being registered via a different company and having different hosting. This is sufficiently unusual as to be a strong indicator that the web management of all these groups is linked.
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## 2. Media coverage and Vote Leave statements on a ‘second referendum’

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JUNE 2015

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### **On the Referendum #6: Exit plans and a second referendum**

*Dominic Cummings’s blog, 23 June 2015*

“There are three connected questions that add up to some interesting problems for both sides of the referendum debate: .... 2) *Should NO demand a second referendum in the hope of forcing the parties to commit to one?* One can see why NO might argue for a second vote. It enables NO to make a NO vote seem much less risky. ‘If you vote YES, you won’t get another vote for another 40 years – if ever. You should vote NO to Cameron’s rubbish deal. If you vote NO, you will force a new Government to negotiate a new deal and give you a new vote ... What a NO vote really means would depend upon what the political parties say they will do and this remains unclear as these issues have not been explored yet ... But – we are where we are, the referendum is going to happen. How to maximize chances of avoiding disaster? Expanding the debate to consider a second negotiation and a second referendum offers potential advantages...”

<https://dominiccummings.wordpress.com/2015/06/23/on-the-referendum-6-exit-plans-and-a-second-referendum/>

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### **‘No’ campaign coordinator pushes idea of two referendums**

*The Spectator, Coffee House blog, 23 June 2015*

“Dominic Cummings is the man drafted in to put together the putative No campaign for the EU referendum. Cummings has a tendency to surprise and he has done that today with a piece that pushes the idea that the No campaign should say that there would be a second referendum if Britain votes Out ...”

<http://blogs.spectator.co.uk/2015/06/no-campaign-chief-pushes-idea-of-two-referendums/>

**Boris calls for ‘No’ to Europe – then ‘Yes’**

*Sunday Times*, 28 June 2015

“Boris Johnson is preparing to call for a “no” vote in Britain’s referendum on the European Union in an attempt to extract greater concessions from Brussels than David Cameron is demanding ...”

[http://www.thesundaytimes.co.uk/sto/news/uk\\_news/article1574571.ece](http://www.thesundaytimes.co.uk/sto/news/uk_news/article1574571.ece)

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**Boris Johnson warms to idea of voting no in EU referendum**

*The Guardian*, 28 June 2015

“Boris Johnson has given his strongest indication yet that he could vote against Britain staying in the EU, because he believes this could trigger a second referendum after more far-reaching renegotiations with Brussels ... According to a report in the *Sunday Times*, which sources close to the mayor describe as reliable, Johnson is warming to the idea of using a no vote to force Brussels to improve its offer to Britain. “We need to be bold, Johnson reportedly told friends. “You have to show them that you are serious.” ...”

<http://www.theguardian.com/politics/2015/jun/28/boris-johnson-eu-referendum-double-strategy-vote>

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**EU referendum: London Mayor Boris Johnson wants public to vote for an exit**

*CityAM*, 28 June 2015

“London Mayor Boris Johnson has hinted he is in favour of voting “no” in the EU membership referendum. Ultimately, he says he wants the UK to remain in the bloc, but hopes voting to leave will shock EU leaders into giving Britain a better deal. According to sources who spoke to *The Sunday Times*, he told friends he wants a two-stage referendum, where the public initially votes in favour of an exit, and then votes to stay in once a better deal is offered ...”

<http://www.cityam.com/218945/eu-referendum-london-mayor-boris-johnson-indicates-hes-favour-brexit>

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**JULY 2015**

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**Why won't Cameron seize his chance on the EU?**

*The Spectator*, James Forsyth, 4 July 2015

“But the arrival of Dominic Cummings, the man who led the successful push to keep Britain out of the single currency, has changed all that. Cummings plans to fight a guerrilla war. He is busy going around London explaining to people that a No vote wouldn't mean that Britain would be straight out of the EU. Rather, it would just be a rejection of the deal that Cameron had negotiated... It is perhaps telling that Boris Johnson is said to be flirting with the idea of voting No, safe in the knowledge that another vote would follow before Britain actually quit...”

<http://www.spectator.co.uk/2015/07/why-wont-cameron-seize-his-chance-on-the-eu/>

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**Beware, today's agonies in Athens may be repeated in our own EU vote**

*Sunday Times*, Adam Boulton, 5 July 2015

“Britain's “no” champions are urging Cameron to play hardball. They are cheered by the appointment of Dominic Cummings to kick-start the campaign. He is advocating a Syriza-style approach, suggesting that if Britain votes no it will still be possible to renegotiate and hold a second referendum to stay in ...”

<http://www.thesundaytimes.co.uk/sto/comment/columns/adamboulton/article1576750.ece>

**On the referendum #9: Cameron begins his renegotiation ...**

*Dominic Cummings's blog, 6 July 2015*

“A NO vote in the first referendum would not, as a matter of fact or law, mean we had left the EU or would immediately leave. It would in practice be a rejection of Cameron’s deal and a direction from the public for a new government team to negotiate a new deal... Some [Conservative] leadership candidates will like the idea of a second referendum – it allows them to position themselves against Cameron’s deal without committing themselves to OUT ...”

<https://dominiccummings.wordpress.com/2015/07/06/on-the-referendum-9-cameron-begins-his-renegotiation-the-commission-sets-out-its-timetable-for-new-treaty-pre-2025-bj-sj-make-moves-a-greek-no/>

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**On the referendum #10: Do you want to be a hammer or an anvil? Building a team for the NO campaign**

*Dominic Cummings's blog, 7 July 2015*

“Everything will need to be pared down to a few fundamental objectives such as: ... And it will require some game changers, of which a second referendum is, perhaps, one...”

<https://dominiccummings.wordpress.com/2015/07/07/on-the-referendum-10-do-you-want-to-be-a-hammer-or-an-anvil-building-a-team-for-the-no-campaign>

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**On the referendum #11: new ICM poll on a second referendum idea, Boris etc**

*Dominic Cummings's blog, 20 July 2015*

“A few weeks ago I wrote a blog on the issue of exit plans and a possible second referendum. According to various media reports, Boris liked the idea and has told people so ...”

See also reply to Matthew Parris in the Comments underneath:

Matthew Parris: “What if we voted No to staying in, then, in the second referendum, No to the terms of leaving?”

Dominic Cummings: “We would be in confusing and unknown territory particularly if we had done an Article 50 process and therefore there might be little / no time to fix what the public disliked.”

<https://dominiccummings.wordpress.com/2015/07/20/on-the-referendum-11-new-icm-poll-on-a-second-referendum-idea-boris-etc/>

Also published here:

**ICM poll shows public support a second referendum on the EU**

*The Spectator*, Coffee House blog, Dominic Cummings, 20 July 2015

<http://blogs.spectator.co.uk/2015/07/icm-poll-shows-public-support-a-second-referendum-on-the-eu>

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**Boris Johnson's two EU referendum plan backed by 40 per cent of Brits**

*Huffington Post*, 20 July 2015

“A proposed second referendum on the UK’s European Union membership has the support of two in five Brits, according to a new opinion poll ... London Mayor Boris Johnson is believed to be in favour of the two referenda option, which would allow Britain to reject David Cameron’s renegotiation package but potentially secure a better deal from Brussels. Dominic Cummings, former special adviser to Michael Gove, revealed the polling results on his blog today ...”

[http://www.huffingtonpost.co.uk/2015/07/20/boris-johnson-eu-referendum-two\\_n\\_7832952.html](http://www.huffingtonpost.co.uk/2015/07/20/boris-johnson-eu-referendum-two_n_7832952.html)

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**OCTOBER 2015**

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**Boris Johnson wanted as figurehead by both sides in EU referendum campaign**

*The Guardian*, 8 October 2015

“In a sign of his interest in the out camp, Johnson last met its campaign director, Dominic Cummings, a former special adviser to Michael Gove, to discuss Cummings’ proposal for two referendums. Johnson is interested in his idea that the first referendum could open the way for a second – and more serious – set of negotiations that could lead to a new “grand bargain” between Britain and the EU. This could allow Johnson to burnish his Eurosceptic credentials before the Tory leadership contest by endorsing the out campaign while claiming that he is not calling for a definitive break with the EU ...”

<http://www.theguardian.com/politics/2015/oct/08/boris-johnson-figurehead-eu-referendum-campaign>

## **Why voting to leave the EU might not actually mean Brexit**

*Daily Telegraph*, 15 October 2015

“This starts with Dominic Cummings, the mad genius who helps run the Vote Leave campaign. He has suggested that if Britain voted to leave the EU, it wouldn't actually leave immediately. Instead, a negotiation with the EU would ensue, in which the UK agreed its terms of severance. Those terms would then be put to another referendum ...”

<http://www.telegraph.co.uk/news/newstopics/eureferendum/11932990/Why-voting-to-leave-the-EU-might-not-actually-mean-Brexit.html>

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### **Dominic Cummings on Twitter**

*@OdysseanProject*, 15 October 2015

“Interesting piece by Matthew Parris in @spectator re my summer blog on second referendum. I obv need to update...”

<https://twitter.com/odysseanproject/status/654599764357550080>

Reply from Tom W Huxley @tomwhx, “regional campaign coordinator for @vote\_leave”

“@odysseanproject I asked Matthew Elliott about this last week and he seemed to back it. Roland Rudd strongly indicated it would mean "chaos"”

<https://twitter.com/tomwhx/status/654616013418405888>

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### **OK: I'm convinced: one EU referendum might not be enough**

*The Spectator*, Matthew Parris, 17 October 2015

“In June, Mr Cummings (a fierce Eurosceptic now attached to one of the groups campaigning for a ‘leave’ result) floated the idea that if Britain voted to reject Mr Cameron’s new terms of membership, a second referendum should be promised, to take place after our government had negotiated with our European partners the proposed terms of our departure. In this second referendum (suggested Cummings) voters would be asked whether they accepted those terms ...”

<http://www.spectator.co.uk/2015/10/ok-im-convinced-one-eu-referendum-might-not-be-enough>

## **The Remain and Leave campaigns go head-to-head for the first time — here’s what happened**

*The Spectator*, Coffee House blog, 20 October 2015

“Cummings also continued to make the argument that there is a possibility of two EU referendums — something Arron Banks and the Leave.EU camp believe is counterproductive ...”

<http://blogs.spectator.co.uk/2015/10/remain-leave-campaigns-go-head-head-first-time-heres-happened>

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## **EU referendum: David Cameron turns to UN to secure deal**

*Daily Telegraph*, 24 October 2015

“Last night, one of the Prime Minister’s most senior aides made an outspoken attack on eurosceptics who have argued that Mr Cameron could get a better deal if the UK voted to leave the EU first - and then held another negotiation, followed by a second referendum. The senior Number 10 figure said it was “ridiculous” to suggest that Mr Cameron would be willing to countenance a second referendum. It will be seen as a rebuke in particular to Boris Johnson, who is believed to back the idea, and Dominic Cummings, Michael Gove’s former adviser, who is now helping to run the Out campaign, Vote Leave. Mr Johnson, the Mayor of London, is said to have told friends that he wanted the public to vote to leave the EU because this would force Brussels to offer far better terms which the public could then support in a second referendum. ...”

<http://www.telegraph.co.uk/news/newstopics/eureferendum/11953156/EU-Referendum-David-Cameron-turns-to-UN-to-secure-deal.html>

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## **PM: No second chances in EU referendum**

*Sunday Times*, 25 October 2015

“Senior Tories have argued that the best way of securing a new deal for Britain would be to vote “out” in the referendum, forcing Brussels to offer more concessions that the public could then back in a second vote. Last night, however, one of Cameron’s senior aides broke cover and accused the Vote Leave campaign of “lacking confidence in their own case” by proposing the plan ...”

[http://www.thesundaytimes.co.uk/sto/news/uk\\_news/article1624045.ece](http://www.thesundaytimes.co.uk/sto/news/uk_news/article1624045.ece)

## **David Cameron's jibe at Boris Johnson over plans for second vote on EU exit**

*Mail on Sunday, 25 October 2015*

“David Cameron has taken a sideswipe at Boris Johnson over the EU referendum by pouring scorn on claims by 'Out' campaigners that there could be a second vote on Britain's links with Brussels ... Leaders of the 'Out' campaign allied to Mr Johnson have argued that if Britain votes to quit the EU, Brussels would make more concessions to try to keep us in, leading to a second referendum. But the Prime Minister dismissed the idea that in the event of an 'Out' result, 'the Government would have a stronger hand to embark on a second negotiation with the rest of the EU and then to hold a second referendum', said the aide. 'The Prime Minister is clear that is simply not going to happen. From the outset, he has been clear this will be a straightforward In/Out choice and that's exactly what it will be. Leave means leave.' It was 'not credible to suggest the public could vote to leave and then the Government would ignore voters and negotiate to remain'. The second referendum was suggested by arch-Eurosceptic Dominic Cummings, director of the Vote Leave campaign ...”

<http://www.dailymail.co.uk/news/article-3288188/David-Cameron-s-jibe-Boris-Johnson-plans-second-vote-EU-exit-PM-s-senior-aide-said-campaigners-scared-losing.html>

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## **David Cameron rejects plans for another EU referendum if public votes to leave**

*Independent on Sunday, 25 October 2015*

“David Cameron has slapped down the plan favoured by Boris Johnson, one of the leading candidates to succeed him as Tory leader, for a second EU referendum in the event of the first one resulting in a vote to leave. A senior Cameron aide said the PM is “clear that it is simply not going to happen. From the outset, he has been clear this will be a straightforward in-out choice and that’s exactly what it will be. Leave means leave.” ...”

<http://www.independent.co.uk/news/uk/politics/david-cameron-rejects-plans-for-another-eu-referendum-if-public-votes-to-leave-a6707446.html>

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## **No 10 rules out 'double referendum' on EU**

*PoliticsHome, 25 October 2015*

“An idea has been floated by – among others – the director of Vote Leave Dominic Cummings, that if Britain votes to quit the EU, it would force the bloc to make major concessions on membership terms that the Government could then put to the people in a second, final referendum ...”

<https://www.politicshome.com/party-politics/articles/story/no-10-rules-out-double-referendum-eu>

## **EU referendum: Prime Minister David Cameron says no second vote**

*CityAM*, 25 October 2015

“Prime Minister David Cameron has dismissed suggestions that a “leave” vote in the European Union referendum could lead to a second vote, with Downing Street aides saying that another referendum is not in the cards. One senior aide was quoted over the weekend saying: ... “It is not credible to suggest that the majority of the British public could vote to leave and then the UK government would ignore the voters and negotiate to remain. That option of ‘let’s have another go’ is not on the ballot paper.” Cameron has promised an in/out referendum by the end of 2017, following a period of renegotiation. London mayor Boris Johnson has reportedly considered pushing for a second vote, with the idea that an initial vote for the UK to leave the EU would force Brussels to make more concessions to British demands. Dominic Cummings, a former Number 10 adviser who is director of the Eurosceptic “Vote Leave” campaign, has also suggested the possibility of two referendums ...”

<http://www.cityam.com/227228/eu-referendum-prime-minister-david-cameron-says-no-second-vote>

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## **Cameron rules out second EU referendum if UK votes to leave - aide**

*Reuters*, 25 October 2015

“Britain will not hold a second “In-Out” vote on its membership of the European Union if the public opt to leave the bloc at a referendum due by the end of 2017, a senior aide to Prime Minister David Cameron said on Sunday. Some in the ‘out’ camp, including Vote Leave campaign director Dominic Cummings, have suggested that if Britain votes to quit the EU it could be used as a bargaining tool to get more concessions from Brussels ahead of another referendum, or a vote on the terms of the exit. British media have reported that London mayor Boris Johnson, tipped as a future contender for the leadership of Cameron’s Conservatives, is a supporter of the double referendum idea ...”

<http://uk.reuters.com/article/uk-britain-eu-idUKKCN0SJ0E920151025>

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## **EU vote irreversible, insists No.10**

*The Times*, 26 October 2015

“Mr Cameron has become exasperated by claims that the best way to achieve genuine reform in Brussels was to vote for an exit then apply to rejoin on better terms and hold a second referendum. Boris Johnson is among senior Conservatives who have expressed interest in the idea first floated by Dominic Cummings, who now heads the Vote Leave campaign. ...”

<http://www.thetimes.co.uk/tto/news/politics/article4596375.ece>

## **Vote Leave – Campaign News**

26 October 2015

“Over the weekend a number of papers reported that David Cameron has ruled out a second referendum in the event of a 'Leave' vote saying that 'leave means leave'. This ignores the reality that were the Government to lose the referendum, most in his own party think David Cameron would have to resign and a decision about how to handle a 'leave' vote will be for his successor...”

[http://www.voteleavetakecontrol.org/151026\\_campaign\\_news](http://www.voteleavetakecontrol.org/151026_campaign_news)

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## **NOVEMBER 2015**

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### **The Neverendum – does out mean out?**

*European Council on Foreign Relations, 2 November 2015*

“A new round has opened up in the debate about the British referendum. The question is: does ‘out’ really mean out? The British government claims that it does ... But the ‘Out’ campaign is taking a different position. Dominic Cummings, campaign director of Vote Leave, one of the three campaigns vying to become the official ‘Out’ campaign, said “If you vote no, you will force a new government to negotiate a new deal and give you a new vote” At first glance, this may seem like a strange position. Isn’t the point of the ‘Out’ campaign to leave the EU rather than having another referendum?...”

[http://www.ecfr.eu/article/commentary\\_the\\_neverendum\\_does\\_out\\_mean\\_out](http://www.ecfr.eu/article/commentary_the_neverendum_does_out_mean_out)

**David Cameron warns Brussels: UK will be 'successful' outside EU; But kills off Boris 'double referendum' plan**

*Huffington Post*, 9 November 2015

“But Mr Cameron will also reject calls from some Eurosceptics, including Boris Johnson, for a ‘double referendum’ that would exploit a Brexit vote to get more powers returned to Britain ... Boris Johnson and other Eurosceptic Tories have flirted with the idea put forward by Vote Leave chief Dominic Cummings ...”

[http://www.huffingtonpost.co.uk/2015/11/08/david-cameron-warns-bruss\\_n\\_8505818.html](http://www.huffingtonpost.co.uk/2015/11/08/david-cameron-warns-bruss_n_8505818.html)

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**JANUARY 2016**

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**Dominic Cummings on Twitter**

*@OdysseanProject*, 14 January 2016

“6/ Why No10 floating? Terror at the 2nd referendum and trying to shut it down. GO's rivals are pondering this card v carefully...”

<https://twitter.com/odysseanproject/status/687629859456155648>

“Osborne on #Newsnight visibly scared by idea of second referendum for good reason. He needs to scare people. #VoteLeave is safer option”

<https://twitter.com/odysseanproject/status/687775314282475521>

Reply from Paul Stephenson, @stephenson\_pr, “Comms director at @vote\_leave”:

“@odysseanproject @tomwhx Voting Leave is the safer choice. Amazing that @George\_Osborne is ruling out 2nd ref that he will have no say over”

[https://twitter.com/stephenson\\_pr/status/687778077401821184](https://twitter.com/stephenson_pr/status/687778077401821184)

**Britain's lowest paid workers could be stripped of tax credits under latest plans to cut EU migration**  
*The Independent*, 15 January 2016

“It comes as George Osborne ruled out a second referendum – a plan first suggested by his Tory leadership rival Boris Johnson – saying the upcoming vote was a “once in a lifetime” decision. “There’s no second vote. This is the crucial decision of our lifetimes,” he told *BBC Newsnight*. Dominic Cummings, a former Tory Cabinet adviser, immediately accused him of trying to “scare” voters into voting to remain in the EU ...”

<http://www.independent.co.uk/news/uk/politics/eu-referendum-britains-lowest-paid-workers-could-be-stripped-of-tax-credits-under-latest-plans-to-a6813666.html>

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**Vote Leave – Weekly Update**

15 January 2016

“If we vote ‘remain’ we’ll be locked in the boot of the car. We won’t get another say. The politicians will sign up to the next Treaty like they always do and give away more power and money. If we Vote Leave, we have a chance of forcing a better UK-EU relationship. We keep the process alive, we give ourselves a chance ...”

[http://www.voteleavetakecontrol.org/campaign\\_news\\_weekly\\_update\\_15\\_jan](http://www.voteleavetakecontrol.org/campaign_news_weekly_update_15_jan)

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**Daniel Hannan interview on a second referendum**

*BBC Daily Politics*, 15 January 2016

“Brussels doesn’t take no for an answer, at least not the first time. I’m not saying a second referendum, but I think that if we vote no, that’s when they will start to take us seriously, that’s when proper concessions will be put on the table ... All of the conversations I’ve had in Brussels for years about this suggest that in the event of Britain voting to leave some kind of associate membership would very quickly be put on the table ...”

<https://www.youtube.com/watch?v=EhMt8yHCxD8>

## **'Brexit' campaign groups clash over call to become single 'unstoppable force'**

*The Independent*, 18 January 2016

“Leave.EU, meanwhile, has been critical of Mr Cummings’ recent suggestion that a second referendum may have be held in the event of a vote to leave, in order secure public backing for the details of any new arrangement between the UK and the EU ...”

<http://www.independent.co.uk/news/uk/politics/eu-referendum-brexit-campaign-groups-clash-over-call-to-become-single-unstoppable-force-a6820081.html>

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## **What happens if we vote for Brexit?**

*The Constitution Unit*, 19 January 2016

“This raises the question of whether it might be more appropriate to hold a second referendum, following the negotiations, to see whether voters accept the deal ... The idea appears first to have attracted attention after it was suggested in a blog post by Dominic Cummings, leading light in the Vote Leave campaign ... Anyone who suggests that unsure voters can vote to ‘leave’ at the initial referendum safe in the knowledge that they can later change their minds is either playing with fire or manipulating voters disingenuously ...”

<https://constitution-unit.com/2016/01/19/what-happens-if-we-vote-for-brexit/>

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## **Brexit campaigner Cummings pushes plan for second referendum**

*Bloomberg*, 21 January 2016

“Britain’s planned referendum on European Union membership has been blamed for dragging down sterling and souring investor sentiment. But for one of the groups agitating for a so-called Brexit, a single vote isn’t enough: It wants two ...”

<http://www.bloomberg.com/news/articles/2016-01-21/-brexit-campaigner-cummings-pushes-plan-for-second-referendum>

## **An interview with Dominic Cummings**

*The Economist*, 21 January 2016

“BAGEHOT: In the event of an Out vote do you think the government would seek to hold another referendum, on the terms of Brexit?”

DOMINIC CUMMINGS: I think that is a distinct possibility, yes. It’s obviously not something that we can force. We’re a campaign group. But I think it is perfectly possible that leadership candidates to replace David Cameron will say that they think there are good grounds for a new government team to offer the public a voice on what the deal looks like. And we obviously wouldn’t oppose that, if that’s what senior politicians want to offer. I think there’s a strong democratic case for it ...”

<http://www.economist.com/blogs/bagehot/2016/01/out-campaign>

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## **The pros and cons of a second referendum**

*ConservativeHome*, 21 January 2016

“Of the various complexities floating around the EU referendum, one seems to inspire more head-scratching than most. The question of whether Britain should have two referendums rather than one has been around for a while – even George Osborne was forced to reject it on *Newsnight* last week. Dominic Cummings, Vote Leave’s campaign director, was advocating a second referendum in a Bloomberg interview only yesterday ...”

<http://www.conservativehome.com/thetorydiary/2016/01/the-pros-and-cons-of-a-second-eu-referendum.html>

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## **Could there be a second EU referendum?**

*Open Europe blog*, 27 January 2016

“The idea of a second EU referendum has been floating around for a few months after being first suggested by Vote Leave Campaign Director Dominic Cummings. It has also been mentioned by Mayor of London Boris Johnson amongst others ...”

<http://openeurope.org.uk/today/blog/could-there-be-a-second-eu-referendum/>

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## FEBRUARY 2016

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### **Farage: 'Vote Leave' campaign are talking about a 'double referendum' – We can't allow it**

*Breitbart*, Nigel Farage MEP, 5 February 2016

"I was further alarmed to hear Dominic Cummings, Vote Leave's campaign director, tell a group of UKIP MEPs that a double referendum might be the way to get some senior figures into the campaign. The idea that we should win a referendum on leaving the EU and then be offered better terms to vote a second time to become associate members appalls me and I could not countenance working with anyone who suggested that idea..."

<http://www.breitbart.com/london/2016/02/05/farage-vote-leave-campaign-are-talking-about-a-double-referendum-we-cant-allow-it/>

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### **Farage rips into Daniel Hannan as Tory MEP refuses to rule out 'double referendum'**

*Breitbart*, 15 February 2016

"The Oxford Union were informed that Mr. Hannan should not speak on the platform for an 'out' vote because he supports the 'Vote Leave' campaign which is currently believed to be campaigning for a "double referendum". A "double referendum" is the idea that Britain could vote to leave the EU, then have another round of negotiations, and another referendum on those negotiations. The idea is being advanced by Vote Leave's campaign directors Matthew Elliott and Dominic Cummings – the same campaign which Mr. Hannan, his best friend Douglas Carswell MP, and even UKIP's Deputy Chairman Suzanne Evans have signed up to .."

<http://www.breitbart.com/london/2016/02/15/twitter-spat-farage-rips-into-double-referendum-daniel-hannan/>

### **Brexit deal: France and Belgium say no further concessions**

*Financial Times*, 18 February 2016

“European diplomats are pressing for a “self-destruct” clause in Britain’s “new settlement” with the EU, which would in effect close down the option of a second renegotiation and referendum should Britain vote to leave. Some Brexit campaigners have argued it would be sensible to have a second referendum after a vote to leave, so British voters are reassured that they will have a say on the terms of exit. Dominic Cummings, campaign director for Vote Leave, told Bloomberg a Brexit vote will give the government “another bite of the cherry; no downside” ...”

<http://www.ft.com/cms/s/0/1ce47f30-d64b-11e5-829b-8564e7528e54.html>

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### **This is your last chance, EU leaders tell Britain**

*The Times*, 19 February 2016

“Dominic Cummings, campaign director for Vote Leave, has said that a vote for Brexit would give the government “another bite of the cherry; no downside”. Boris Johnson, the London mayor, has discussed the second referendum option with Mr Cummings and other campaigners ...”

<http://www.thetimes.co.uk/tto/news/politics/article4694382.ece>

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### **Boris Johnson to campaign for UK to exit the EU**

*Huffington Post*, 21 February 2016

“But there was a hint from the Mayor that he felt that a Leave vote could trigger a desperate move by Brussels to give Britain more of what it wants, through a free trade deal - or a looser EU membership status approved by a second referendum. “There is only one way to get the change we need– and that is to vote to go; because all EU history shows that they only really listen to a population when it says No.” ...”

[http://www.huffingtonpost.co.uk/2016/02/21/boris-johnson-to-campaign-to-leave-eu\\_n\\_9285046.html?1456092069](http://www.huffingtonpost.co.uk/2016/02/21/boris-johnson-to-campaign-to-leave-eu_n_9285046.html?1456092069)

**Boris Johnson dubbed 'Vicky Pollard' as he calls for UK to vote 'Leave' - in order to get a better EU deal**  
*Huffington Post*, 21 February 2016

“Boris Johnson has been dubbed ‘the Vicky Pollard’ of British politics after appearing to back a “no but, yes but” stance on the EU referendum. After weeks of speculation, the Mayor of London finally came off the fence to declare his backing for the “Leave” campaign - but within hours suggested that he also didn’t want full “Brexit” ...”

[http://www.huffingtonpost.co.uk/2016/02/21/boris-johnson-dubbed-vick\\_n\\_9287194.html?1456146296](http://www.huffingtonpost.co.uk/2016/02/21/boris-johnson-dubbed-vick_n_9287194.html?1456146296)

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**Tim Shipman on Twitter (Political editor, *Sunday Times*)**  
*@ShippersUnbound*, 21 February 2016

“Boris is backing a No vote but not necessarily Brexit. Last February he told me he wanted to lead the renegotiation. He still does.”

<https://twitter.com/shippersunbound/status/701527090152271877>

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**Boris Johnson exclusive: There is only one way to get the change we want – vote to leave the EU**  
*Daily Telegraph*, 22 February 2016

“There is only one way to get the change we need, and that is to vote to go, because all EU history shows that they only really listen to a population when it says No ... It is time to seek a new relationship in which we manage to extricate ourselves from most of the supranational elements ...”

<http://www.telegraph.co.uk/news/newsttopics/eureferendum/12167643/Boris-Johnson-there-is-only-one-way-to-get-the-change-we-want-vote-to-leave-the-EU.html>

Cameron rules out second referendum

***The Times*, 22 February 2016**

“The prime minister says that Britain will not renegotiate with the EU if the UK votes to leave. David Cameron attempted to kill off claims that voting to leave the EU could lead to a second referendum or a better membership deal today, as he said that backing Brexit would mark a “final decision” over Britain’s links with Brussels. In an attack on Boris Johnson’s suggestions that supporting EU exit could be used to secure a better deal for Britain, the prime minister said that the idea of a second referendum was “not on the ballot paper” ... Dominic Cummings, of the Vote Leave campaign, is among those to suggest that Mr Cameron should first hold “informal talks” with EU leaders should Britain vote for Brexit ...”

<http://www.thetimes.co.uk/tto/news/politics/article4696640.ece>

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**EU referendum: No 10 rejects idea of second vote if UK decides to leave**

*The Guardian*, 22 February 2016

“Downing Street has quashed a suggestion by Boris Johnson that a second referendum could be held on Britain’s relationship with the EU even if the UK votes to leave in the poll on 23 June ... Cummings believes the prime minister should hold his nerve if he loses the referendum and refrain from invoking article 50, which would trigger two years of exit negotiations.”

<http://www.theguardian.com/politics/2016/feb/22/eu-referendum-no-10-rejects-idea-of-second-plebiscite-if-uk-votes-to-leave>

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**David Cameron ridicules Boris Johnson's second EU referendum idea**

*The Guardian*, 22 February 2016

“David Cameron has vented his frustration at Boris Johnson over Europe, as he ridiculed the mayor of London over his apparent call for a second EU referendum. ... As the London mayor shook his head and shouted “rubbish” in the Commons chamber, the prime minister mocked Johnson by likening his idea for a second referendum to a couple who start divorce proceedings as a way to make up. “I have known a number of couples who have begun divorce proceedings ... But I do not know any who have begun divorce proceedings in order to renew their marriage vows ...”

<http://www.theguardian.com/politics/2016/feb/22/david-cameron-ridicules-boris-johnsons-second-referendum-idea>

**Leave campaigners concerned that London Mayor's statements advocate 'Associate Membership' of EU**

*Breitbart*, 22 February 2016

“Mayor of London Boris Johnson set the ‘Brexit’ debate aflame yesterday by declaring that he would be campaigning for ‘out’. But his words delivered outside home in North London were very carefully chosen. He nailed his colours to the establishment campaign ‘Vote Leave’ mast – now famed for advocating a “double referendum” and “criminal” tactics to circumvent spending rules. So it was not a surprise then, to hear from long-standing referendum campaigners that they are skeptical that Mr. Johnson’s is actually campaigning to leave the European Union. He wants to use a ‘Leave’ vote to enter into another round of renegotiations with the EU, sources tell me. Indeed his words outside his house yesterday were relatively opaque, and lend to the ‘Associate Membership’ argument made by made Conservative Party ‘eurosceptics’...”

<http://www.breitbart.com/london/2016/02/22/boris-vote-out-but-dont-actually-leave-the-establishment-strategy-to-keep-us-in-a-reformed-eu/>

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**Boris Johnson savaged by David Cameron over hints of a second EU referendum if Britain votes 'Leave'**

*Huffington Post*, 22 February 2016

“Boris Johnson has suffered a verbal pummeling from David Cameron over claims that there could be a second referendum if Britain votes to quit the EU. In his most savage public attack on the Mayor of London, the Prime Minister ridiculed his fellow Tory MP with a withering assessment of the idea that a ‘Leave’ vote would allow the UK to negotiate a better deal with Brussels...”

[http://www.huffingtonpost.co.uk/2016/02/22/boris-johnson-savaged-by- n\\_9291608.html](http://www.huffingtonpost.co.uk/2016/02/22/boris-johnson-savaged-by- n_9291608.html)

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**The Waugh Zone**

*Huffington Post*, 22 February 2016

“But it was also a very clear hint that Boris still harbours the ‘second referendum’ idea floated by former Gove aide and Vote Leave chief Dom Cummings. Under this logic, you vote ‘Leave’ now in order to force Brussels to grant us fresh protections, which could then be put to the people in a fresh poll ... Boris’s ‘Indefinite Leave to Remain’ approach (sorry, couldn’t resist) proves again his own famous preference for being ‘pro-cake and pro-eating it’ ...”

[http://www.huffingtonpost.co.uk/2016/02/22/the-waugh-zone-february-2\\_0\\_n\\_9288208.html](http://www.huffingtonpost.co.uk/2016/02/22/the-waugh-zone-february-2_0_n_9288208.html)

## **PM in dramatic House of Commons clash with Boris Johnson as MPs attack EU deal**

*Daily Express*, 22 February 2016

“Mr Cameron also mocked the idea - previously put forward by Mr Johnson - that Britons’ should vote to Leave in June in order to secure a second renegotiation deal from the EU on better terms ... In a direct attack on the Mayor of London, the Prime Minister said: “This is a vital decision for the future of our country. And we should also be clear that it is a final decision. An idea has been put forward that if the country votes to leave we could have a second renegotiation and perhaps another referendum. I won’t dwell on the irony that some people who want to vote to leave – apparently want to use a leave vote to remain ...”

<http://www.express.co.uk/news/politics/646428/David-Cameron-Boris-Johnson-House-of-Commons-EU-renegotiation-statement-Brexit>

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## **Cameron rules out second EU referendum**

*LBC News*, 22 February 2016

“David Cameron has told MPs there could be no second referendum if the UK votes to leave the EU on 23 June ... The idea of a second referendum was reportedly floated by Boris Johnson - who announced on Sunday he will vote Out - as a way of getting further concessions from the EU ...”

<http://www.lbc.co.uk/cameron-rules-out-second-eu-referendum-125505>

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## **EU referendum: Prime Minister David Cameron rejects suggestions from mayor of London Boris Johnson and others that there could be two referendums**

*CityAM*, 22 February 2016

“Speaking in the House of Commons this afternoon, Cameron said that campaigning for the UK to leave the EU, with the hopes of using an initial "leave" result to trigger another EU renegotiation process and referendum, "ignores more profound points about democracy, diplomacy and legality". "I won’t dwell on the irony that some people who want to vote to leave – apparently want to use a leave vote to remain," Cameron said in a prepared statement setting out his case for why the UK should remain in the EU ...”

<http://www.cityam.com/235130/eu-referendum-prime-minister-david-cameron-facing-tough-questions-from-euro-sceptic-mps-including-mayor-of-london-boris-johnson-in-the-house-of-commons-today>

## **EU referendum: A second referendum would be extremely difficult, legal expert warns**

*CityAM*, 22 February 2016

“Prime Minister David Cameron may well be in dispute with Mayor of London Boris Johnson over the idea that a "leave" vote in the upcoming referendum on Britain's relationship with the European Union could lead to a second referendum, but would it be possible anyway? Well, constitutional expert Dr Alan Renwick said that it would be "very difficult to have a second referendum on this issue". Talking to BBC's The World at One, Renwick said ... "The problem is with a second referendum is that there is a process that takes place once a country decides to leave the EU, as laid out in the Lisbon Treaty," he added. "So, if the Prime Minister declares the UK wants to leave the EU, that's followed by a negotiation between member states on the terms of Brexit, not on the terms of having some sort of better form of negotiated membership." ... Bernard Jenkins, a pro-Out Conservative MP, earlier urged the Prime Minister not to "bind himself" to the framework of Article 50, saying there are other ways to leave. He echoes Vote Leave, which have already said: "We do not necessarily have to use Article 50 - we may agree with the EU another path that is in both our interests." ...”

<http://www.cityam.com/235149/eu-referendum-a-second-referendum-would-be-extremely-difficult-legal-expert-warns>

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## **How Will Straw and Dominic Cummings are pulling the strings of the EU Referendum power players**

*Evening Standard*, 24 February 2016

“That is because Cummings has an irrepressible urge to show off his intellect, in writing and interviews and blogging, ... Among his key points, currently being played out are: ... Don't make the referendum final: an Out vote doesn't mean an automatic trigger of Article 50: it is space for more manoeuvre ...”

<http://www.standard.co.uk/lifestyle/london-life/how-will-straw-and-dominic-cummings-are-pulling-the-strings-of-the-eu-referendum-power-players-a3188156.html>

**Michael Howard: David Cameron's reform bid has failed – it's time to go**

*Daily Telegraph*, Michael Howard, 25 February 2016

“Ever since, and even today, my preference has been for the UK to remain a member of a genuinely and fundamentally reformed EU ... So the questions I have asked myself are these: has the prospect of fundamental reform finally been extinguished or is there still some way in which that can be achieved? ... There is only one thing that just might shake Europe’s leaders out of their complacency: the shock of a vote by the British people to leave. If the UK voted to leave, there would be a significant chance that they would ask us to think again. When Ireland and Denmark voted to reject EU proposals, the EU offered them more concessions and, second time round, got the result they wanted ...”

<http://www.telegraph.co.uk/news/newsttopics/eureferendum/12173888/Michael-Howard-David-Camerons-reform-bid-has-failed-its-time-to-go.html>

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**Former Tory leader Michael Howard becomes latest to call for UK to leave EU**

*The Guardian*, 26 February 2016

“Howard argued that the only way to “shake Europe’s leaders out of their complacency” was by voting to leave. “There would be a significant chance that they would ask us to think again. When Ireland and Denmark voted to reject EU proposals, the EU offered them more concessions and, second time round, got the result they wanted,” he wrote ...”

<http://www.theguardian.com/politics/2016/feb/26/former-tory-leader-michael-howard-call-uk-leave-eu>

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**Blow to UK's Cameron as Michael Howard backs Brexit**

*Newsweek*, 26 February 2016

“In his column, Howard appeared to back the option of a vote to leave the EU in order to return to Brussels for further negotiations, rather than an immediate exit. “If the U.K. voted to leave, there would be a significant chance that [Europe] would ask us to think again,” he wrote. “When Ireland and Denmark voted to reject EU proposals, the EU offered them more concessions and, second time round, got the result they wanted.” ...”

<http://europe.newsweek.com/michael-howard-backing-brexit-david-cameron-boris-johnson-430649>

**Michael Howard: The EU is flawed and failing and we should leave**

*The Guardian*, 26 February 2016

“In a blow to the prime minister, who worked for Howard during his time as home secretary in the mid 1990s, the former Tory leader questioned Cameron’s claim that a second referendum after a no vote was “for the birds”. The prime minister has dismissed the idea of a second referendum, which Boris Johnson has supported as a way of renegotiating new terms, by saying he would begin exit negotiations immediately after a vote to leave ...”

<http://www.theguardian.com/politics/2016/feb/26/michael-howard-eu-flawed-failing-leave-tory-danger-european-union>

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**Reality Check: How plausible is second EU referendum?**

*BBC News*, 26 February 2016

“If Britain votes to leave the EU what terms of exit would Britain get? How would EU leaders react? Would they plead for Britain to stay, offer a fresh negotiation and hope the UK votes to stay in a second referendum? That is the scenario Leave campaigners want to paint. Former Tory leader Michael Howard is the latest - and most politically hefty - "leaver" to claim a second deal and referendum would be possible. Mr Howard said a no vote would "shake EU leaders out of their complacency". In the frenzied panic that would follow a vote to leave, his argument goes, EU leaders would have to come up with a better deal in their desperation to keep the UK in the club ... In January the director of Vote Leave, Dominic Cummings, told the Economist magazine the UK would not have to trigger Article 50 of the Lisbon Treaty immediately after a leave vote (the process that begins a member state's two year exit from the EU) ...”

<http://www.bbc.co.uk/news/uk-politics-eu-referendum-35670906>

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Boris Johnson’s gamble: Will support for Out take him into No 10?

*The Independent*, 26 February 2016

“A more charitable view of this week’s decision is that Mr Johnson believes an Out vote in June would force the EU to concede much better membership terms for the UK than Mr Cameron has secured. The Mayor has floated the idea of a second referendum. So has Dominic Cummings, the architect of the Vote Leave campaign ...”

<http://www.independent.co.uk/news/uk/politics/boris-johnson-s-gamble-will-support-for-out-take-him-into-no-10-a6898651.html>

**Barroso: Second EU referendum 'unthinkable'**

*LBC News*, 27 February 2016

**“Britain will have only one chance to vote in a referendum on its membership of the European Union, the former president of the European Commission has told Sky News.** Some high-profile campaigners have suggested that voting "Out" could strengthen the UK's negotiating hand ahead of a potential second referendum. ... Former Conservative Party leader Michael Howard has previously suggested that an Out vote would not be binding. London Mayor Boris Johnson also implied a vote to leave the EU could strengthen Britain's negotiating hand ...”

<http://www.lbc.co.uk/barroso-second-eu-referendum-unthinkable-125854>

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**The EU is our own Hotel California: We can check out, but we'll never leave**

*Mail on Sunday*, Peter Hitchens, 28 February 2016

“I’m sorry to break this to you but it looks as if we’ll have to endure not one but two EU referendum campaigns. The second one, by the way, will definitely end in a vote to stay in. The ‘exit’ campaign was last week cunningly taken over by Tories who don’t want to leave the Superstate and will use a vote to leave (if it happens) as the basis for yet another round of negotiations with Brussels. Boris Johnson and Michael Howard are ancient liberal Europhiles, who have learned how to seduce the Tory Party with speeches that sound Right-wing but aren’t really. It is painful to see this cynical seduction technique at work, and watch the old ladies fall for it...”

<http://www.dailymail.co.uk/debate/article-3467666/PETER-HITCHENS-EU-Hotel-California-check-ll-never-leave.html>

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**Peter Hitchens: Tory establishment ‘Vote Leave’ doesn’t want Britain to exit EU**

*Breitbart*, 28 February 2016

“Writing in his column in the *Mail on Sunday* today, Peter Hitchens is perhaps the first non-Breitbart journalist to pick up on the fact that ‘Vote Leave’ – run by Conservative Party figures Dominic Cummings and Matthew Elliott – don’t really want to leave the European Union. Breitbart London has covered this at length previously, with the reporting culminating in a Twitter spat between UK Independence Party leader Nigel Farage and Vote Leave spokesman Daniel Hannan whereby the former challenged the latter on the idea of a double referendum ...”

<http://www.breitbart.com/london/2016/02/28/peter-hitchens-tory-establishment-vote-leave-doesnt-want-to-britain-to-exit-eu/>

**Here's how London could stay in the EU – even if the rest of Britain votes to leave**

*The Independent on Sunday, 28 February 2016*

“Both Vote Leave’s Dominic Cummings and London Mayor Boris Johnson have suggested the idea of a second referendum to decide the terms of any departure. Such a vote, were it to happen, offers the opportunity to get creative with our membership of the EU. One possibility is that, even if Britain votes to leave, London could remain and retain its own distinct links with Europe ...”

<http://www.independent.co.uk/voices/here-s-how-london-could-stay-in-the-eu-even-if-the-rest-of-britain-votes-to-leave-a6901271.html>

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**Lord Howard: There is a chance of a second EU referendum**

*Huffington Post, 29 February 2016*

“Former Tory leader Lord Howard today claimed “there is a chance” of a second referendum if the UK votes to Leave the EU in June. The Conservative peer, who last week announced he was backing Brexit, believes the European Union could offer the UK a “better deal” when confronted with the reality of the UK leaving the institution ...”

[http://www.huffingtonpost.co.uk/2016/02/29/lord-howard-eu-referendum-brexit- n\\_9346568.html](http://www.huffingtonpost.co.uk/2016/02/29/lord-howard-eu-referendum-brexit- n_9346568.html)

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**MARCH 2016**

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**Second EU referendum is just pie in the sky**

*Financial Times, 1 March 2016*

“Some are trying to circumvent the problem by arguing that a vote for Out, far from triggering Britain’s departure from the EU, would give a second bite at the cherry. Britain’s leaders, in their view, could go back to Brussels and cut a better deal. The notion that the British might vote to leave on June 23 in order to remain is a bizarre one ... Far from being some hard-boiled negotiating tactic, this argument amounts to little more than wishful thinking ...”

<http://www.ft.com/cms/s/0/a577c5f0-dfbf-11e5-b67f-a61732c1d025.html>

**Vote Leave pushed to reveal plans for second UK vote on European membership**

*The Independent*, 2 March 2016

“The group leading the campaign to pull Britain out of the European Union is to be challenged by Tory and Labour MPs to reveal whether it supports plans to hold a second referendum in the event of a Leave vote. Senior Eurosceptics backing Vote Leave, including the former Tory leader Lord Howard, have suggested that a “no” vote might not necessarily mean Britain leaving the EU – but would be a chance to negotiate better terms ...”

<http://www.independent.co.uk/news/uk/politics/eu-referendum-vote-leave-pushed-to-reveal-plans-for-second-uk-vote-on-european-membership-a6908151.html>

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