From: FOI

**Sent:** 21 June 2019 16:52

To:

**Subject:** FOI 129-19 - Response and extension under 10(3)

Attachments: BrownG-to-PosnerB-2019-05-20-Brexit-Party-Funding-Questions (redacted).pdf

**Categories:** 

SharePointLocationUrl: SharePointAbsoluteFileUrl:



Dear ,

Our Ref: FOI-129-19

Thank you for your email to the Electoral Commission dated 23/05/2019.

The Commission aims to respond to requests for information promptly and has done so within the statutory timeframe of twenty working days.

Your request is in bold below followed by our response.

- 1) How many FOI REQUESTS have you failed to respond to in the statutory time frame?
- 2) what was the subject matter of those you failed to respond to in the statutory time frame?
- 3) how many FOI REQUESTS have gone on to an internal review?
- 4)how many complaints have there been to the Information Commissioner in respect of your responses?
- 5) is there a policy to refrain from answering certain requests or at certain times. Are some requests delayed until after an election ?
- 6) is there a shortage of officers able to sign off responses and if so why?
- 7) may I see any correspondence between Gordon Brown and the Commission regarding his public and televised request for an investigation into Brexit Party finances.
- 8) may I see any internal correspondence relating to the Brexit Party finances and any letters from the public requesting an investigation into the same.
- 9) how many requests have you received for investigation into other parties or electoral campaigners such as 'Peoples Vote' or 'Led by Donkeys' whether registered with the Commission or not.

# 10) will you be taking action against 'Led by Donkeys' who are running an EXPENSIVE campaign passing itself off as tye Brexit Party'

# 11) has the Cabinet Office given the Commission any instructions relating to FOI responses generally and during an election period?

Our response is as follows:

We hold the information you have requested.

## 1) How many FOI REQUESTS have you failed to respond to in the statutory time frame?

Between the 1<sup>st</sup> of January 2019 and the date of your FOI request, the Commission has received a total of 133 requests for information and failed to respond to 45 FOI requests within the statutory 20 working day timeframe.

# 2) What was the subject matter of those you failed to respond to in the statutory time frame?

Please note that the titles of each of these requests, in no particular order, are as follows:

- EC Statistics and EC visit to party HQs
- Electoral Commission visits to party HQs
- Investigations March May 2019
- Change UK The Independence Group Assessment
- Speakers Committee Correspondence with EC
- Correspondence and meetings with Mark Sedwill
- Approvals Board minutes
- Legal advice received
- Campaigns run by the Commission
- UK 2020
- Change UK The Independent Group
- Correspondence between the EC, TIG and or Change UK
- EC fines to political parties
- Electoral Commission staff
- Referendum on Membership of the EU question
- The Independent Group
- English Independence application
- Time taken to register party
- List of past and present parties denied telephonic contact
- EC Website and IT support
- Breakdown of votes EU Referendum
- Correspondence with named groups
- New Party Applications in 2019
- Voters with no fixed address
- Channel 4 News 'The Banks Files'
- Constitution and financial plan British Union & Sovereignty Party
- Constitution and Financial Plan The Brexit Party
- The Independence Group meeting
- The Independence Group communications

- The Brexit Party
- Horwich First assessment
- IT software and staff
- Brexit Party
- Ecclesfield Parish Independent
- Brexit Party
- Brexit Party
- Party spending returns
- Campaign spending (Lib Dem)
- Campaign spending (LibDems)
- EC staff correspondence
- £100,000 donation given to the Scottish Conservatives

# 3) How many FOI REQUESTS have gone on to an internal review?

Between the 1<sup>st</sup> of January 2019 and the date of your FOI request, the Commission has received 2 requests for review.

# 4) How many complaints have there been to the Information Commissioner in respect of your responses?

Between the 1<sup>st</sup> of January 2019 and the date of your FOI request, one complaint was made to the Information Commissioners Office regarding the validity of the request under the FOI Act. To date there has been no outcome from that complaint.

# 7) May I see any correspondence between Gordon Brown and the Commission regarding his public and televised request for an investigation into Brexit Party finances.

The Commission received a letter from Gordon Brown dated 20 May 2019 which we are disclosing to you. There has been no investigation into the Brexit Party, in relation to alleged irregularities over party funding or for any other reason. The Commission did visit the premises of the party on 21 May 2019 in order to examine in more detail the party's systems in relation to donations.

# Section 40(2):

You will notice that certain personal details have been redacted from the document we are releasing. Section 40(2) provides for an exemption where the information requested constitutes personal data as defined by the Data Protection Act 2018 (DPA), and where release of the information requests would breach one of the data protection principles. Some of the information contained in the requested information falls within the description of personal data as defined by section 1 of the DPA because the information relates directly to an identifiable living individual.

8) May I see any internal correspondence relating to the Brexit Party finances and any letters from the public requesting an investigation into the same.

The Commission has extended the deadline of your request under section 10(3) of the Freedom of Information Act 2000 by an additional 20 working days, in relation to your question under point (8) of your request.

Section 10(3) enables a public authority to extend the 20 working day time limit where the authority is considering a 'qualified exemption' under the Freedom of Information Act.

We are currently considering the public interest factors in relation to section 36 (Prejudice to the effective conduct of public affairs), a qualified exemption under the Act.

Section 10(3) applies only to the requests that are subject to the consideration of a qualified exemption. In addition the application of section 10(3) can only be applied where the remaining parts of the request have been responded to. As such, I can confirm that the Commission has responded to the remainder of your request within the statutory timeframe.

You may expect to receive a reply by the Commission on the 22 June 2019.

9) how many requests have you received for investigation into other parties or electoral campaigners such as 'Peoples Vote' or 'Led by Donkeys' whether registered with the Commission or not.

We do not categorise incoming communications as 'requests for investigation' and we do not therefore have a record of such communications. I can confirm that we have received 9 communications relating to People's Vote, and 32 relating to Led by Donkeys.

Where an allegation is made of a potential breach of the party finance rules, supported by some evidence or identifying credible sources of evidence, we will assess that and may open an investigation. We have not conducted assessments into either People's Vote' or 'Led By Donkeys. I trust that this information satisfies your request. The Commission strives to be an open, transparent authority, but in some circumstances we cannot responsibly release requested information, and we ask for your understanding in this regard.

If you are not satisfied with this response, please note that the Commission operates a review procedure, details of which can be found on the Commission website at: <a href="http://www.electoralcommission.org.uk/about-us/freedom-of-information-requests/how-do-l-make-an-foi-request">http://www.electoralcommission.org.uk/about-us/freedom-of-information-requests/how-do-l-make-an-foi-request</a>

Please also note that if you have exhausted all internal Commission review procedures and you are still not satisfied you have the right to appeal to the Information Commissioner. Details of this procedure can be found on the ICO website: https://ico.org.uk/

Yours sincerely,

Access to Information Officer (FOI and DPA)

# **The Electoral Commission**

FOI@electoralcommission.org.uk electoralcommission.org.uk



# THE OFFICE OF GORDON AND SARAH BROWN

Telephone: \*44 (O)2O3 116 37O3 info@gordonandsarahbrown.com PO BOX 6755O London EC2P 2JF www.gordonandsarahbrown.com

Bob Posner Chief Executive, The Electoral Commission

20 May 2019

Dear Mr Posner,

I am writing to the Electoral Commission and the authorities at the European Parliament to request that you investigate the sources of funding for the 'Brexit Party', and in particular whether any funding is coming from abroad and from whom – including whether any funding is coming from Russia; and whether proper and full declarations are being made in line with election rules.

There are immediate reasons why an investigation is now urgent and essential.

The 'Leave.EU' campaign is the subject of a criminal investigation by the National Crime Agency, and two other investigations by the Metropolitan Police and the Information Commissioner's Office.

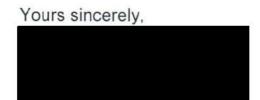
Leave.EU's best-known funder, Arron Banks – whose commercial interests have never been fully and satisfactorily divulged and are under investigation, and who has long term contacts with Russia – has admitted that he has secretly funded Nigel Farage at least £450,000 during the time that Mr Farage has held public office as a European MEP – payments that raise questions about conflicts of interest and which should have been declared.

Now Mr Farage heads the new 'Brexit Party', which is making questionable claims about the true source of its funding, especially claims about multiple, small, anonymous donations at a time when



the Electoral Commission has warned of the dangers of such donations being a cover for dirty money. I understand that on their website the 'Brexit Party' are able to receive donations from foreign sources – even in foreign currency.

Given the Electoral Commission's duty to monitor every UK party's election finance and spending, it is important that we do not wait for months after the event to investigate dubious claims by a party with links to people who have been under investigation by you in the past.



From: FOI

**Sent:** 01 August 2019 13:43

То:

**Subject:** FOI 129-19 - Response

**Attachments:** FOI 129 Extracts Table - Release.pdf

**Categories:** 

SharePointLocationUrl: SharePointAbsoluteFileUrl:



Dear ,

Our Ref: FOI-129-19

Thank you for your email to the Electoral Commission dated 23/05/2019.

Your request is in bold below followed by our response.

8) may I see any internal correspondence relating to the Brexit Party finances and any letters from the public requesting an investigation into the same.

Our response is as follows:

We hold the information you have requested.

The Commission has already responded to parts 1-7 and 9-11 of your request on 21/06/2019 and at that time we also extended the deadline of your request under section 10(3) of the Freedom of Information Act 2000 by an additional 20 working days, in relation to your question under point (8) of your request.

Therefore, in this response we will only address part 8 of your request.

The Commission aims to respond to requests for information promptly and regrets that we have not done so within the statutory timeframe of twenty working days on this occasion.

8) may I see any internal correspondence relating to the Brexit Party finances and any letters from the public requesting an investigation into the same.

We are interpreting the first part of your request to relate to internal correspondence in relation to The Brexit Party's systems for receiving and accepting donations, as this was the matter you asked about in question 7. The Commission's internal correspondence on that matter led to the visit to the premises of the party on 21 May 2019 in order to examine in more detail the party's systems in relation to donations, and to establish whether any regulatory action by the Commission might be required (which could include an investigation, but might equally involve guidance or recommendations), and we consider the information you have

requested to be exempt from disclosure. We considered more than one class of exemption, but we have concluded that the information is principally exempt under section 31(1)(g) of the Act.

## Section 31(1)(g)

Section 31(1)(g) exempts from disclosure information that would or would be likely to prejudice the exercise of the Commission's functions under PPERA for the purposes of ascertaining whether there are circumstances which would justify regulatory action in pursuance of any enactment exist or may arise as provided by section 31(2)(c) of the FOI Act.

The Commission considers that disclosure of the information you have requested would prejudice the exercise of the Commission's statutory functions and its ability to conduct regulatory work such as in this matter. The information you have requested consists of the Commission's preparations for the visit, identifying for example what information should be sought during the visit. It is important that the Commission is able to hold such internal discussions in confidence, and disclosure would result in those we regulate having detailed knowledge of our approach to our regulatory work, with the real risk that it would provide assistance to any organisation seeking to evade the rules.

In addition, it would be likely to discourage organisations from consenting to such visits and cooperating if the organisation had reason to believe that detailed information about the visit, even if only in terms of the Commission's preparation, was to be made public.

Application of the section 31 exemption is subject to the public interest test. There are a number of factors that must be considered and weighed in the balance. The factors we have considered are set out below.

The public interest lies in enabling the Commission to undertake regulatory work based on a firm factual basis and to gather information on a confidential basis. It is in the public interest to maintain this confidentiality, as it allows the Commission to plan such work without fear that it would be undermined by disclosure, and encourages the free and frank provision of information from others to the Commission without which the Commission could not perform its statutory functions.

The Commission aims to be robust and fair in its regulatory work. We acknowledge that there is a legitimate public interest in carrying out our functions in an open and transparent way, and in promoting public understanding of our work as a regulator. These are matters we acknowledge and take into account, including when deciding whether to disclose information, whilst ensuring proper regulation of party political funding. For those reasons we made a public announcement of the recommendations we made to the party after the visit, which you can find here:

https://www.electoralcommission.org.uk/i-am-a/journalist/electoral-commission-media-centre/party-and-election-finance-to-keep/political-parties-and-non-party-campaigners-accepting-payments-online

We have subsequently disclosed more detail as to those recommendations in response to a different request under the Freedom of Information Act. You can find that <u>here</u>.

Having carefully weighed the public interest relating to possible disclosure of the information requested under Section 31(1)(g), we are satisfied that it is not appropriate at this time to disclose the information which the Commission holds. The Commission is satisfied that maintaining the exemption outweighs the public interest in disclosure taking into account the factors above, including the information we have already disclosed.

As regards to letters from the public requesting an investigation we are disclosing a number of emails to you, redacted for personal data. I think it is important to be absolutely clear however, and as we have repeatedly said, the Commission's decision to visit The Brexit Party was not based on any complaint made to us. The decision was based on our own view as to possible risks to the integrity of the PPERA regime.

## **Exemptions under section 40(2)**

You will notice that certain personal details have been redacted from the documents we are releasing. Section 40(2) provides for an exemption where the information requested constitutes personal data as defined by the Data Protection Act 2018 (DPA), and where release of the information requested would breach one of the data protection principles. Some of the information contained in the requested information falls within the description of personal data as defined by section 1 of the DPA because the information relates directly to an identifiable living individual. This includes names and contact details of individuals in some instances. The individuals in some cases are junior staff members and they would not reasonably expect their information to be released.

I trust that this information satisfies your request. The Commission strives to be an open, transparent authority, but in some circumstances we cannot responsibly release requested information, and we ask for your understanding in this regard.

If you are not satisfied with this response, please note that the Commission operates a review procedure, details of which can be found on the Commission website at: <a href="http://www.electoralcommission.org.uk/about-us/freedom-of-information-requests/how-do-l-make-an-foi-request">http://www.electoralcommission.org.uk/about-us/freedom-of-information-requests/how-do-l-make-an-foi-request</a>

Please also note that if you have exhausted all internal Commission review procedures and you are still not satisfied you have the right to appeal to the Information Commissioner. Details of this procedure can be found on the ICO website: https://ico.org.uk/

Yours sincerely,
Access to Information Officer (FOI and DPA)
The Electoral Commission
FOI@electoralcommission.org.uk
electoralcommission.org.uk

#### FOI 129-19 Extracted e-mail content for release

### 05-16

I read with alarm on the Byline Times website that there are serious claims about the funding of The Brexit Party, see here:

https://bylinetimes.com/2019/05/14/brexit-party-donations-an-open-invitation-to-launder-money/

and here:

https://bylinetimes.com/2019/05/15/brexit-party-donations-farages-miracle-claims-do-not-add-up/

Please can you inform me what the Electoral Commission is intending to do about

these serious allegations?

### 05-17

Recently Nigel Farage went on the record to say that Russians are financing him and his campaign. I believe the footage is to be shown tonight at 7pm on channel 4 news.

Nigel Farage is standing as an MEP in my European Parliament constituency and the real possibility that a candidate and party is being funded by sources outside the country are very concerning.

I am concerned that Mr Farage is attempting to hide in plain sight, in the manner that the president of the united states appears to have adopted. I urge you to investigate this as a matter of urgency.

## 05-18

In view of the on-going legal and criminal questions over political funding from the 2016 Referendum, would you please investigate the Brexit Party's methodology of collecting donations without transparency or accountability.

Please see the link below explaining the concerns Thank you for your assistance

https://bylinetimes.com/2019/05/14/brexit-party-donations-an-open-invitation-to-launder-money/

## 05-18a

I am an ordinary voter.

I am concerned about the financing of the Brexit Party. This organisation solicits donations of just under £500, for which it appears to keep no record

of the donor. There is a strong suspicion that foreign people or organisations, who may not be permissible donors under UK electoral law, may be making multiple donations.

Under the law, there is an obligation on the Brexit Party to ensure that donations over £500 are legal. It seems to me that this obligation still applies if the donation is made in multiple tranches of under £500. I suspect the Brexit Party is deliberately failing to fulfil this obligation.

Please use your powers to investigate as a party of urgency, and if appropriate to disqualify Brexit Party candidates

## 05-18b

Can you please advise how we can be sure the brexit party is actually receiving small donations from individual donors rather that donors breaking down large sums and making multiple donations less than the £500 limit?

I fear they have created a system that makes it easy to mask large payments from individual donors thus allowing them not to be declared.

Can you advise what steps have been taken to ensure they are not breaking the rules.

## 05-18c

Please investigate the Brexit Party max donation of £500 as a matter of urgency.

They don't allow a donation of higher that £500 so no donor identities

have to be recorded. They are gaming the system.

## 05-18d

I am concerned that The Brexit Party, currently fighting the European Elections, has been established in such a way as to render its finances deliberately opaque. Its fund-raising activity is as a result vulnerable to abuse of electoral finance legislation and makes it less susceptible to normal democratic controls.

The Brexit Party is set up to receive donations of up to £500 through PayPal (see https://thebrexitparty.org/donate/). Such donations do not convey information about the donor to the Party, which therefore has no way of knowing that donors are not making large donations broken down into multiple amounts of up to £500, nor is the Party able to offer any transparency about the location or nationality of donors or whether they are on the electoral register.

Given that the Brexit referendum was blighted by campaign finance violations on which the Electoral Commission took action - notably Leave.EU with which

current senior figures of The Brexit Party were closely associated - it is a matter of urgency that this issue is speedily looked into.

I am a private citizen, and not a member of any political party, but deeply concerned about the undermining of the integrity of our political system.

#### 05-18e

I am concerned about the policy of the Brexit Party to accept donations of £500 online without requiring much personal information. It seems that a donor can make hundreds of £500 donations without triggering requirement for the party to check if the donations are from appropriate donors. The Brexit party has raised £1.5million without apparently attracting sufficient traffic to its website to amass 30000 donations. Please let me know if the Electoral Commission will investigate these concerning issues as a matter of urgency, as the outcome of the European Parliament election may have a bearing on the UK taking an irreversible decision to leave the EU, which must not be discovered at a later date to have been illegally funded.

#### 05-18f

I'm sure you might have received many emails about this, but I was wondering if you are aware (or is it public information) of how The Brexit Party is being financed and how?

Given that there are supposed to be strict criteria around campaign and political financing, it would seem that Nigel Farage is essentially saying 'I do have to tell anyone anything', and this seems to be acceptable?

I would be grateful for any information that you can provide.

## 05-19

Reckon you lot can actually be bothered to investigate this then? Absolute

## disgrace

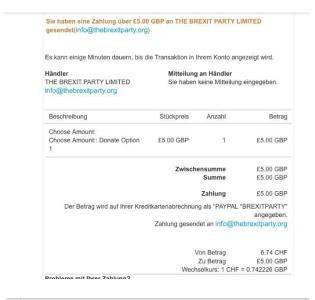
info@thebrexitparty.org

You sent a payment of £5.00 GBP to THE
BREXIT PARTY LIMITED
(info@thebrexitparty.org)

It may take a few moments for this transaction to appear in your account.

Merchant Instructions to merchant
THE BREXIT PARTY You haven't entered any instructions.

## https://twitter.com/carolecadwalla/status/1130196581964079104?s=19



Exchange rate: \$ 1 USD = £ 0.7485 GBP

Converted From: \$6.68 USD

Converted To: £5.00 GBP

PayPal makes money on converting currencies.

#### 05-19a

I'd like to understand if there are concerns or activities being undertaken to look into the potential exposure of political parties to money laundering.

I heard that the Brexit Party is using Paypal as a means of collecting money from its supporters, and that the money this generates is available to the beneficial use of the Brexit Party Limited.

As Nigel Farage is a director of this company and would clearly be understood to be a Politically Exposed Person within the meaning of the Anti Money Laundering regulations, I understand that this means the company needs to be very careful in its processes to ensure that no money comes from dodgy locations.

In terms of "does AML apply", it looks like the company would fall under the heading of company service provider, hence DNFBPs, so I believe that this legislation should apply to this company.

Please let me know what has been done to ensure that the money trail for donations is therefore being recorded adequately to meet these regulations, and

that the company has provided the required training to all of its staff in respect of this regulation.

#### 05-19b

Next week we go to the polls to vote in the European Elections. The Brexit Party according to several surveys are in the lead with voters. But where are all of their donations coming from?

In a Twitter video, Nigel Farage told supporters: "We've done it. We've hit 100,000 registered supporters, all of you paying £25 a time. (As reported by The Mirror)

"Nigel Farage claims that the Brexit Party had 60,000 paid-up donors in the first nine days after the party's launch, raising £1.5 million." (as reported by Jolyon Maugham in Scram)

It is a grave matter that Nigel Farage is subverting democracy as The Brexit Party cannot prove that all donations have come from UK Citizens on the electoral register.

Please investigate.

#### 05-19c

Please investigate Brexit party donations and hold Nigel Farage to account.

## 05-20

The first two objectives on the enforcement page of your website are to

- ensure that there is transparency about party and election finance
- ensure that the rules on party and election finance are followed

I write because, like many others, I believe that the Limited Company known as "The Brexit Party" is in breach of the spirit and indeed the letter of the law (PPERA) in the structure that it has created for fundraising. The "Party" is of course not a registered political party with a membership, but a limited company.

- As you will be aware from many sources, donations to the Brexit Party are made via PayPal to an account outside the UK (in Michigan). This in itself makes the tracing of donations virtually impossible.
- The website encourages donations of £500 and under, with <u>no checks on identity</u>. In fact it states that identity checks are required for donations over this amount (implying that they are not required for smaller donations), and the website does not actually have a mechanism for larger donations.

This is clearly designed to permit multiple "small" and untraceable donations – as far as I can see, there is no mechanism to detect or prevent large donations made up of multiple smaller amounts. Nor is there a mechanism to prevent donations from overseas (I understand that this has been tested from various countries, such as Switzerland).

It would seem clear that "The Brexit Party" has set out to deliberately undermine the PPERA in obfuscating its funding. Indeed it seems highly unlikely that there was sufficient internet traffic in the first few days of the "party's" existence to account for the

£750,000 in small donations. The inescapable conclusion is that the funding mechanism was created to hide large, <u>impermissible</u>, donations coming in multiple smaller amounts, possibly from abroad, and to obscure the financial trail. The Brexit Party is therefore intentionally failing in its duty to ensure that donations only come from permissible sources.

Clearly there is no time to complete an enquiry prior to May 23, however I must ask that you announce such an enquiry immediately. During the 2016 referendum you established that leave.eu significantly broke electoral law. However, by the time your findings were published their campaign had already gained unfair advantage through this criminal activity. I urge you to minimise the risk of this happening again.

#### 05-20a

Watching the news over the last few days is surreal. How can it be credible The Brexit Party does not take details of people donating less than £500. How would they check if 1 individual is donating sums of £499 500 times. In today's automated payments what stops a bot creating false £25 membership fees?

How can it be possible that Nigel Farage can receive huge payments Channel 4 news investigation yet the actual source of money is still secret? Surely this must go against electoral law?

Are you investigating? If it takes up to 2 years? How can we have confidence we are not being manipulated now?

Is it possible to give advice before Thursday's election of the risks of not knowing where political funds come from. Risks of finding out after MEP seats have been won.

I would prefer this was investigated I do not need an individual reply.

#### 05-20b

I am writing to express my very grave concern that the Brexit Party is unable to demonstrate compliance with PPERA 61. This letter refers to donations made at the following site: <a href="https://thebrexitparty.org/donate/">https://thebrexitparty.org/donate/</a> PPERA 61 states:

61 Offences concerned with evasion of

restrictions on donations. (1)A person

commits an offence if he-

- (a)knowingly enters into, or
- (b)knowingly does any act in furtherance of,

any arrangement which facilitates or is likely to facilitate, whether by means of any concealment or disguise or otherwise, the making of donations to a registered party by any person or body other than a permissible donor.

The Brexit party is keeping no records of "donations" below £500 which are made through the above webpage. There does not seem to be any mechanism within their website to prevent a donor from making multiple donations or to ascertain whether anyone making such multiple donations might be an impermissible donor. Anyone making such multiple donations would be committing an offence under PPERA 61 since they would be knowingly attempting to conceal or disguise impermissible donations.

The Brexit Party website has been deliberately set up to avoid the need to collect donor details and even highlights the need to record details if the donation exceeds £500. They are thus well aware of the regulations and yet have knowingly created a system which facilitates the misuse of the website by impermissible donors. This is an offence under PPERA 61.

This matter is extremely urgent and I urge you to ensure that the Brexit Party complies with PPERA 61 forthwith and/or immediately acts to stop any further spending of potentially inappropriate funds.

## 05-20c

Please investigate the PayPal online payments that are being collected by the Brexit Party to ensure

- a) they are not coming from a foreign source
- b) they are not exceeding the permitted £500, i.e. by paying in large amounts in

multiples of £500 This issue has been raised by former Prime Minister, Gordon

Brown.

I am also concerned that the Brexit Party is using a logo consisting of an arrow pointing to their box on the ballot paper. How can we be sure that this is not influencing some voters?

#### 05-20d

I am devastated that there appears to be no investigation or control applied to the fund-raising of the Brexit Party and their money-laundering PayPal account.

They have set this up with no way to find out who their donors are and no way

to establish that people are eligible donors or are not making multiple donations of £500.

They broke the law in the 2016 referendum and are clearly decided that there are no real consequences to them doing the same in this election, supported by all sorts of dark money social media advertising.

IT MAKES AN UTTER FACRS OF OUR DEMOCRACY THAT THIS IS ALLOWED TO TAKE PLACE UNCHALLENGED OR UNCOMMENTED UPON! WHY?

#### 05-20e

I am writing to express my concern about the way in which Nigel Farage's Brexit Party has been able to gather untraceable donations using PayPal, keeping the identity of large (and potentially foreign) donors secret.

I agree with British barrister Jolyon Maugham that Farage may be breaking electoral law, and that this should be investigated with some urgency. The Brexit Party is in fact a private company with no members, no manifesto and no transparency. Its candidates should not be allowed to stand for election on 23 May if the funding is coming from illegal sources such as foreign investors.

#### 05-20f

My only reason for emailing is because of a threat to democracy. Worldwide.

Because the Electoral Commission does not regard anything under £500 as a 'donation', multiple payments from overseas fall below the radar.

This potential influence must be investigated

## 05-20g

I am becoming increasingly concerned with the allegations of improper funding on behalf of both Nigel Farage personally and the Brexit party.

More specifically, the donations made by Aaron Banks to sustain Mr Farage should not be treated, as Mr Farage suggests, a personal matter. He is an elected official leading a party standing in UK elections and there is a clear risk that this money is in effect a political donation.

In respect of the Brexit Party, the £500 limit of donations has the effect of hiding the true source. The Electoral Commission has warned of small donations previously and this risk is heightened here. As highlighted by the previous point, Mr Farage has a close relationship with large donors who are not averse to breaching electoral law. It would be a simple matter to breakdown in to smaller amounts and thus hide from public scrutiny, large donations.

#### 05-20h

There have been a number of allegations, seemingly well backed up, made about the funding of the Brexit Party. I suggest that the funding of the Brexit Party should be investigated.

## 05-20i

I wish to voice my concerns regarding the Brexit party run by Nigel Farage. UKIP and the Leave Campaign have already been associated with dark money, and funding via the DUP which circumvented UK election funding restrictions. Regrettably timely and appropriately scaled investigation did not take place, and yet again, some Brexit activists appear to be easily circumventing the law regarding disclosure of donors.

Today the Guardian reports that the Brexit party permits donations of less than £500 via a PayPal account, which leaves the way open to abuse by foreign donors wishing to influence British elections. This has serious implications for democracy and the future of our country. I would like some reassurance that this issue is now being investigated by you with the urgency and seriousness it deserves.

## 05-20j

A legal expert reckons there is a "strong argument" that the Brexit Party may have broken electoral law. [1] Scram News got the exclusive story – now it's time for Nigel Farage to answer the serious questions that have been raised about their funding.

Jolyon Maugham, a leading barrister, believes that the Brexit Party could be breaking electoral law by attempting to use a loophole to avoid collecting information about large donors. They could be getting this cash from anyone.

If you agree these claims must be investigated urgently, especially ahead of the imminent European elections, take action now: send a message to the Electoral Commission calling on them to investigate Brexit Party donations and hold Nigel Farage to account.

#### 05-20k

I have read in the Independent today that it is the Electoral Commission's intention to investigate the funding of the Brexit Party and I am concerned about this. Not because I think you will find anything wrong, but because the timing of this is being seen as devisive, a political attempt to undermine the Brexit Party in the run up to the EU Elections.

More than 100,000 people have paid a supporter fee of £25 to the Brexit party, ..., generating approximately £2.5 million. I suspect funding has also come from elsewhere, from sponsors who wish to support the party. With the rising prominence of the Brexit Party, representing millions of Brexiteers

across the UK and substantially leading in the polls at the moment, none of this financial support should be seen as surprising.

If the Commission wishes to be seen as fair (and that ought to be presumed), then one other new and opposing party should also be investigated at the very same time. Anna Soubry, for Change UK when interviewed recently by Julia Hartley-Brewer, refused to declare where her new party's funding is coming from. At least the Brexit Party has declared it's primary source, it's 100,000+ supporters.

Now you can ignore this, or you can demonstrate that you are not working at the behest of a remain parliament and to their agenda - and do the right thing.

It is my intention to post a copy of this email on Facebook, so that Brexiteers and others can see the question has been asked. How the Electoral Commission responds will be viewed with a great deal of interest I am sure and will be seen as an indicator of how independent the commission really is.

#### 05-201

For your information ... in the reception of the brexit party at .... London today , ... no longer than 15 minutes, within that time frame 3 people walked in off the street with envelopes containing donations for the brexit party. ... this property has Cctv in situ this could be downloaded to substantiate my statement.

#### 05-20m

I'm emailing to request that in the light of reports that the Brexit party may be funded by methods in breach of laws for political funding in the Uk and also in the light of Nigel Farage to discuss how the party is funded that the electoral commission take steps to investigate the sources of party funding and publicly report on same.

## 05-20n

As the Electoral Commission put out a statement today saying they would be visiting the Brexit Party's offices tomorrow to understand their systems for screening PayPal donations, just days before a polling day, can you confirm that you'll be doing the same for the Chan UK, Labour and Conservative Parties as well?

ITV is reporting the exact same PayPal donation system has been available on their websites for weeks also. I am extremely concerned at Change UK who have smeared the Brexit Party during this campaign period, despite reporting their donations in the exact same way...

#### 05-20o

https://bylinetimes.com/2019/05/15/brexit-party-donations-farages-miracle-claims-do-not-add-up/

When are you going to do your job and investigate this charlatan?

Are you investigating the funding of Farage's Brexit Party. If not, you should be.

## 05-20p

I understand that the Brexit party are using PayPal to accept donations without knowing details of the donors. I believe this could easily breach electoral rules if multiple donations of £500 or less have been in fact been made by the same donor. In all likelihood many of these donations will be from overseas donors, individuals, agencies and probable enemies of Britain.

With this blatant attempt to circumvent electoral rules, I think it needs to be investigated and reported on prior to Thursday's EU elections. To not do so means that our democracy is undermined yet again.

## 05-20q

I feel the Brexit Party and Nigel Farage should be investigated as it's becoming clear, via media investigations, that electoral rules have been broken, and that large amounts of cash received are in contravention of electoral law.

This needs to be investigated

#### 05-20r

It's becoming obvious that the Brexit Party not only has some very shady donors that it wishes to hide, but also that it's website is engineered to take advantage of donations of less than £500 being outside the need to question who the donor is. A malicious foreign party could easily abuse this loophole to fund a party who's ideals intend to cause chaos in the country. As an investigation after the event would only result in a pointless fine, you need to investigate this urgently (now) and take immediate action.

#### 05-20s

I am deeply concerned about the possibility of illegal financing within the Brexit party for the MEP elections, particularly after reading this article in the Guardian this morning.

https://www.theguardian.com/politics/2019/may/20/brexit-partys-funding-must-be-investigated-says-gordon-brown

a British citizen I urge you to investigate this as a matter of urgency.						