

From: [FOI](#)
To: [REDACTED]
Subject: FOI 083-20 - Response
Date: 21 July 2020 15:30:43

Dear [REDACTED],

Our Ref: FOI-083-20

Thank you for your email to the Electoral Commission dated 24 June 2020.

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 shown below followed by our response.

According to the Electoral Commission database, Christopher Harborne has made very frequent and significant donations to the Brexit Party in 2019 and 2020.

In light of this, I would like to request all emails that mention, or refer to, Christopher Harborne and his donations to the Brexit Party. I would expect this to include internal emails that mention or refer to Christopher Harborne, as well as emails between the Electoral Commission and Mr Harborne.

I would like to receive this information in an electronic format. If you feel that a substantive response to this request is not possible within a reasonable time frame, I would be grateful if you could contact me and provide assistance as to how I can refine the request. If you need any clarification, please contact me. I look forward to receiving a response in 20 working days. Many thanks.

Our response is as follows:

We hold the information you have requested.

We are disclosing information, including emails between The Brexit Party and the Commission regarding the permissibility of Mr Harborne. These emails were sent between 29 August 2019 and 06 September 2019. The emails also show that the discussion concluded by confirming that he is a registered overseas elector and therefore a permissible donor. In addition to this, we have also included other emails that mention Mr Harborne, as requested, such as internal newsletters. Under section 54 of the Political Parties, Elections and Referendums Act 2000 (PPERA), registered parties must only accept donations from certain sources, these are:

- an individual registered on a UK electoral register, including overseas electors and those leaving bequests.
- most UK-registered companies.
- a Great Britain registered political party.
- a UK-registered trade union.
- a UK-registered building society.
- a UK-registered limited liability partnership (LLP) that carries on business in the UK.
- a UK-registered friendly society.
- a UK-based unincorporated association that carries on business or other activities in the UK.

Parties can also accept donations from some types of trust, and from certain public funds.

Under section 141 of PPERA, UK citizens living abroad can apply to be an overseas voter if they have been registered to vote as a resident in the UK in the last 15 years and are eligible to vote in UK Parliamentary general elections.

British citizens living overseas became eligible to register under The Representation of the People Act 1985. Originally, they could register for 5 years in the constituency in which they were last registered. This was later extended to 20 years by the Representation of the People Act 1989, and then reduced to 15 years by PPERA.

We found that Mr Harborne was registered as an overseas elector and was eligible to vote in UK Parliamentary elections at the relevant times. This means that he was a permissible donor.

To access the documents we are releasing, you will need to use Objective Connect, our secure document sharing system:

You will receive an 'Invitation to Objective Connect Email Notification' (sent to the inbox of [REDACTED]). This notification will contain a link to enable you to start accessing your information. Please find below details on how to access the specific area we have set up for your documents.

1. Click on the link in the email.
2. You will be prompted to set up your username and password. Your username will be your email address, and your password can be whatever you like.
3. With your username and password, enter both details at the login screen and click 'login'.
4. You will now see your personal page, which will show the Share 'FOI – 083-20'
5. By clicking on the name of the share, you will find your documents.
6. You may view any of these documents
7. In addition you may download a copy to your personal computer by selecting the 'download' option and then 'save'.

This service will be closed one month from our response date; the **21 August 2020, at 5pm.**

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. For instance, we have redacted personal information including Mr Harborne's home address, and names of Electoral Commission staff members in compliance with the General Data Protection Regulation and section 40 of the Freedom of Information Act. We have also redacted information relating to matters outside of this FOI request 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: <https://www.electoralcommission.org.uk/freedom-information/make-a-freedom-information-request>.

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

Information Officer

FOI@electoralcommission.org.uk

The Electoral Commission

electoralcommission.org.uk

From: [REDACTED]
To: [John Franks](#)
Cc: [REDACTED]
Subject: The Brexit Party Q2 permissibility checks CCM:0488105
Date: 23 August 2019 18:00:11
Attachments: [Brexit Party Q2 2019 Permissibility checks.xlsx](#)

Hi John,

I've attached the permissibility checks for TBP Q2 donations. I've added comments where I have emailed the councils to confirm whether individuals were on the register, either because we haven't got all the updates or because they weren't found in our original checking.

I haven't emailed [REDACTED] Council (the likely authority for the [REDACTED] postcode situation that [REDACTED] spoke to you about) as I thought it was worth waiting until we had had some confirmation from The Brexit Party as to what the correct address definitely is.

I'm off on Tuesday but I'm sure if you have any questions about this [REDACTED] can fill you in.

Have a nice bank holiday weekend!

[REDACTED]
[REDACTED]
Financial Reporting Adviser
The Electoral Commission
electoralcommission.org.uk

Donee	Donor Status	Value	Donor Name	Company no.	Donor Address	Town/ City	Postcode	Local Authority	1st Check	Permissible	2nd Check	Permissible	Additional Notes
The Brexit Party	Individual	Various	Christopher Harborne	N/A	██████████ ██████████ ██████████	██████████	██████████	██████████	██████████	?? - need more info	██████████	Y	Confirmed with Local Authority - overseas elector

From: John Franks
Sent: 02 December 2019 11:27
To: Majella La Praik [REDACTED]
Cc: Dan Adamson [REDACTED]
Subject: RE: Christopher Harborne donations CCM:0058881

Hi Maj

After sending the e-mail to you, I rang Mehrtash and thanked him for the response. In addition to the response in his e-mail, he also explained that in Thailand, Mr Harborne, as a businessman, is required legally to adopt a local name, hence the confusion arising from The Times article (I have not verified if this is correct).

I also said that I would consider his e-mail response and would get back to him if I have any further questions.

John

From: Majella La Praik [REDACTED]
Sent: 29 November 2019 10:02
To: John Franks [REDACTED]
Cc: Dan Adamson [REDACTED]
Subject: RE: Christopher Harborne donations CCM:0058881

Thanks John. I think at this stage, please can you go back thanking him for providing the information and so promptly.

Ta,
Maj

From: John Franks
Sent: 28 November 2019 15:50
To: Majella La Praik [REDACTED]
Cc: Dan Adamson [REDACTED]
Subject: FW: Christopher Harborne donations CCM:0058881

Maj

As I am off tomorrow, I thought you should see the e-mail chain between myself and Mehrtash Azami, the Brexit Party treasurer.

John

From: Mehrtash A'zami [REDACTED]
Sent: 28 November 2019 15:35
To: John Franks [REDACTED]
Subject: Re: Christopher Harborne donations CCM:0058881

Dear Mr Franks,

As per our follow-up telephone conversation yesterday I can confirm that Mr Harborne's identity is NOT in doubt nor has it ever been. I have performed KYC with him in-person furthermore information provided by our bank confirm has confirmed he is the remitter by way of name and address match.

He has been a long-standing donor to the Conservative Party from 2001 - 2019 and donated to the Brexit Party in the same quarter (Q3) as he did the Conservative Party.

I trust other parties are also subject to this rigorous scrutiny.

Yours sincerely,

Mehrtash A'zami

On Thu, 28 Nov 2019 at 13:25, John Franks [REDACTED] wrote:
[Dear Mehrtash](#)

[The question that I am asking is different to the ones I asked you previously about this donor.](#)

[The question I raised yesterday is in relation to The Times article from Tuesday that looked at a Thai businessman who appears to have the same CV as Mr Harborne. So my question is still about how you ascertained that Mr Harborne was indeed the true source of the donations.](#)

[Although you say that you have completed the checks, you have not said what these checks were. Please, therefore, detail the checks that you carried out to confirm that the donations came from Mr Harborne and not from another source using his name.](#)

[Yours sincerely](#)

[John Franks](#)

From: Mehrtash A'zami [REDACTED]
Sent: 27 November 2019 14:49
To: John Franks [REDACTED]
Cc: Party Secretary <party.secretary@thebrexitparty.org>; [REDACTED]
Subject: Re: Christopher Harborne donations CCM:0058881

Dear Mr Franks,

Thank you for your email. This is the *third* time The Electoral Commission have queried this individual donor. I can confirm once again that all checks have been completed to my satisfaction in accordance with PPERA and that Mr Harborne is the source of the donations.

Furthermore we have, in writing, confirmation from his local Electoral Services Officer that he is included on their register which your office have also confirmed to me via email on Fri, Sep 6, 2019.

I also note simultaneous donations from Mr Harborne to The Conservative Party were found to be permissible.

Yours sincerely,

Mehrtash A'zami

On Wed, 27 Nov 2019 at 14:27, John Franks [REDACTED] wrote:
Dear Mehrtash

I am writing regarding donations made by Christopher Harborne to the party and the checks that you have done to ensure that the donor is permissible and is the true source of the donations.

You may have seen the following story in The Times yesterday:

<https://www.thetimes.co.uk/article/christopher-harborne-brexiteer-party-bankroller-has-a-thai-doppelgaenger-jnd0v9qdp>

In relation to Mr Harborne, could you please detail the checks that you have made to ensure that the donations are from Mr Harborne, that is to say that Mr Harborne is the source of the donations. This will include checks you have made to ensure that the donations have been made by him and not another individual or individuals or an organisation?

Yours sincerely

John Franks
Financial Reporting Manager

The Electoral Commission
electoralcommission.org.uk

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Subject: Christopher Harborne donations

Status: Completed

Percent Complete: 100%

Date Completed: 28 November 2019

Total Work: 0 hours

Actual Work: 0 hours

Owner: John Franks

I missed a call from Mehrtash Azami, so called him back at about 16:20, in relation our e-mail correspondence today.

MA explained that they had done checks including witht he bank.

He also explained that in Thailand, Mr Harborne, as a businessman, is required legally to adopt a local name, hence the confusion arrising from The Times article (I have not verified if this is correct).

I said that I would consider his e-mail response sent to me today and would get back to him if I have any further questions.

[REDACTED]

From:

Sent:

To:

[REDACTED]
27 November 2019 11:11

Regulation Directorate; Press; [REDACTED]
[REDACTED]

Subject:

Daily Monitoring Circular - Wednesday 27 November 2019

Dear colleagues

Please find below the main stories for 27 November

Thanks

[REDACTED]

Former Tory donor gave Brexit Party £3m donation, new figures reveal

Businessman Christopher Harbonne has donated £3m over the summer

<https://politicshome.com/news/uk/political-parties/news/108212/former-tory-donor-gave-brexit-party-%C2%A33m-donation-new-figures>

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 19 December 2019 13:41
To: [REDACTED]
Subject: Donor check

[REDACTED], can you do a permissibility check on the following donor to the Brexit Party:

Mr Christopher Harborne, [REDACTED]

John said that you've done this before and know which electoral register to check? The full registers for 2020 are being published this month so you would you mind checking the latest register.

Thanks

From: [REDACTED]
To: [REDACTED]
Subject: FW: Large donors in Q4 (draft list of donation(s) of £500,00 and over)
Date: 24 February 2020 11:39:35

[REDACTED]
This is a list of the donors of that gave £500,000 or more in Q4 either as one off or in aggregate.

List is draft as it may not be complete.

John

From: John Franks

Sent: 21 February 2020 17:12

To: Louise Edwards

Cc: Majella La Praik

Subject: Large donors in Q4 (draft list of donation(s) of £500,00 and over)

Largest donors in Q4 :

Conservative and Unionist Party

Arbutnot Banking Group Plc,	£524,000
Bridgemere UK PLC,	£1,000,000
Countywide Developments Ltd,	£625,751
IPGL Ltd	£1,055,250
J.C.B. Services, Lakeside Works	£907,500
J.S. Bloor (Services) Ltd	£962,000
JC Bamford Excavators Ltd	£2,425,979
John Gore	£1,000,000
Mercantile and Maritime UK Limited	£500,000
David Tilles	£500,000
John Dorrien Caudwell	£500,000
Jonathan Wood	£1,000,000
Malcolm S Healey	£750,000
Peter Wood	£1,000,000
Ann R Said	£505,418
Paul Marshall	£500,000
Peter K Hargreaves	£1,000,000
Trailfinders Limited	£500,000
WA CAPITAL LIMITED	£500,000

Labour Party

Communication Workers Union,	£717,744
GMB,	£921,685
USDAW	£705,871
UNISON	£898,242
UNITE	£4,941,474

Liberal Democrats

Lord David Sainsbury	£8,000,000
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The Brexit Party

Christopher Harborne
Jeremy Hosking

£6,525,000
£625,000

From: [NewsAlert](#)
To: [REDACTED]
Subject: [REDACTED] - Key worker Farage's crypto fat cat backer
Date: 05 May 2020 10:27:13

Key worker Farage's crypto fat cat backer

Tue 5 May 2020, 10:22 BST

Christopher Harborne, a cryptocurrency investor, donated 6.5 million to Nigel Farage's Brexit Party in the final quarter of 2019. He gave 9.7 million to the party over eight months'over half the party's income.

Harborne invests in a web of offshore firms and sometimes uses the pseudonym Chakrit Sakunkrit. Electoral Commission figures also show that the Brexit Party has received 11.6 million in donations above 500 since it was formed.

Farage and chairperson Richard Tice own around 87 percent of the Brexit Party's shares.

<https://socialistworker.co.uk/art/50010/Tory+government+has+lied+over+free+school+meals+for+poor+children>

Extracted by [REDACTED]
For urgent enquiries, please contact [REDACTED]

From: [REDACTED]
To: [Press](#); [REDACTED]
Subject: Week 2 donations report at 2.30 today
Date: 28 November 2019 12:25:59

Hi all

At 2.30pm today we're publishing week two of the pre-poll donations reports. I'm just putting the links into the documents now. The press releases are here:

[Press release](#)

[NI release](#) (no NI parties reported donations this week)

The same donor who gave £3m to The Brexit Party in Q3 of this year (published earlier this week) has given a further £2m to the party in week two. If you have any questions on this / its permissibility / do we have any concerns, please use the lines below as appropriate:

In order to be a permissible donor, an individual, whether based in the UK or overseas, must be on a UK electoral register at the time of the donation. The Brexit Party reported the donations from Mr Harborne as permissible, and as part of our routine compliance work we have verified that he appears on the electoral register.

We are aware of reports that Mr Harborne may also be known by another name, and have asked The Brexit Party whether this impacts on the donations they accepted.

It's also important to note that, as with any elector/donor, we cannot confirm/deny which register he is on, nor whether he is registered as an overseas elector or not. Any further questions, let me know.

Thanks

[REDACTED]
Communications Officer
The Electoral Commission

[REDACTED]
electoralcommission.org.uk

From: [REDACTED]
To: [undisclosed-recipients:](#)
Subject: Press Data Summary: Electoral Commission - 15 May 2020
Date: 15 May 2020 06:30:21
Attachments: [FMLOGO_1125.JPG](#)



Media Coverage for 15 May 2020

Access to articles is subject to copyright restrictions. Authorised users on the [REDACTED] web portal can view articles by clicking on the newspaper headlines.

If you require any assistance with this service, please contact [REDACTED]

[View All Articles](#)

Wales

[REDACTED]

[REDACTED]

[REDACTED]

Trade Press

[Key worker Farage's crypto fat cat backer](#)

Socialist Worker - 06/05/2020

p2 News.

Cryptocurrency investor Christopher Harborne donated £6.5 million to Nigel Farage's Brexit Party in the last quarter of 2019. He gave £9.7 million to the party over eight months-over half the party's income. Harborne invests in a web of offshore firms and sometimes uses the pseudonym Chakrit Sakunkrit. Electoral Commission figures also show that the Brexit Party has received £11.6 million in donations above £500 since it was formed.

[REDACTED]

Sent Date

29/08/2019 17:08

Dear Mehrtash,

Thank you for submitting the party's quarter 2 donations and regulated transactions return. These were published on our website today.

We do have a number of concerns with the quarter 2 donation return which appears to contain a number of inaccuracies.

I have listed these below and highlighted the required action for each.

- 1) You have reported that a donation was accepted from Mr Christopher Harborne of [REDACTED]. As you are aware, political parties are not permitted to receive funds from individuals who are not registered on the UK electoral roll. We will treat this donation, and any further donations from this donor, as impermissible unless you are able to provide the address at which the donor is registered on a UK electoral roll.

Action: Please confirm whether Mr Harborne is an overseas elector and if so, which Local Authority he is registered with.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Where the Commission has reason to believe that an offence has been committed, we will consider it in line with our [Enforcement Policy](#).

Please submit a full response to this email by Tuesday 3 September. If you have any questions in the meantime please let me know as soon as possible; I will be happy to outline the rules regarding donor permissibility if you think this would be helpful.

Kind regards,

[REDACTED]

[REDACTED]
Senior Financial Reporting Adviser

The Electoral Commission
[REDACTED]
electoralcommission.org.uk

[REDACTED]

Sent: 15 June 2020 12:39
Subject: RE: Draft email to The Brexit Party

From: John Franks
Sent: 23 August 2019 18:15
To: Louise Edwards ; Majella La Praik ; [REDACTED]
Subject: RE: Draft email to The Brexit Party

Hi
The team have checked all of the donations. Unfortunately, we are missing registers and updates in relation to five of the donations, so won't be able to complete the checks until we get them from the local authorities.
John

From: Louise Edwards
Sent: 23 August 2019 14:44
To: John Franks [REDACTED] Majella La Praik [REDACTED]
[REDACTED]
Subject: RE: Draft email to The Brexit Party

Hi
And a few comments from me, although the letter looked good. We talked about the possibility of splitting this if we need more time to look at the Q2 return, but ideally to send the whole thing on Tuesday.

Thanks
Louise

From: John Franks
Sent: 23 August 2019 13:51
To: Majella La Praik [REDACTED] Louise Edwards
[REDACTED]
Subject: RE: Draft email to The Brexit Party

Maj
I have added a few comments.
One thing I noticed was that the largest donation that they have accepted gives an address for the donor in Bangkok, Thailand. We do not know from the information given whether the donor (Christopher Harborne) is permissible or not (as he may or may not be registered as an overseas elector). So, we should ask at what address the donor is registered in the UK so that we can be certain of permissibility (and ask how they established permissibility).
On the basis of a lot of missing information from this return, I would also recommend that we go above the usual 25% of checks, and check 100% donations.

[REDACTED]

From: [REDACTED]
Sent: 27 November 2019 17:14
To: John Franks
Cc: [REDACTED]
Subject: RE: Draft press line - donations from Christopher Harborne

Cheers

From: John Franks
Sent: 27 November 2019 17:13
To: [REDACTED]
Subject: FW: Draft press line - donations from Christopher Harborne

Hi [REDACTED]

This is our line in case we get any calls through the PEF Inbox/Cirrus:

Q: Do you have concerns about the permissibility of donations from Mr Harborne?

A: In order to be a permissible donor, an individual, whether based in the UK or overseas, must be on a UK electoral register at the time of the donation. The Brexit Party reported the donations from Mr Harborne as permissible, and as part of our routine compliance work we have verified that he appears on the electoral register. We are aware of reports that Mr Harborne may also be known by another name, and have asked The Brexit Party whether this impacts on the donations they accepted.

John

From: Louise Edwards [REDACTED]
Sent: 27 November 2019 14:10
To: Majella La Praik [REDACTED] John Franks [REDACTED]
[REDACTED] Niki Nixon [REDACTED]
Subject: RE: Draft press line - donations from Christopher Harborne

Thanks Maj, good to get a line on this sorted before tomorrow's publication. I think we need to explain why the extra name bit has prompted us to contact the party. How about this? The last sentence is a bit clunky I know. Better drafting welcomed!

A: In order to be a permissible donor, an individual, whether based in the UK or overseas, must be on a UK electoral register at the time of the donation. The Brexit Party reported the donations from Mr Harborne as permissible, and as part of our routine compliance work we have verified that he appears on the electoral register. We are aware of reports that Mr Harborne may also be known by another name, and have asked The Brexit Party whether this impacts on the donations they accepted.

Louise

From: Majella La Praik
Sent: 27 November 2019 13:37
To: Louise Edwards [REDACTED] John Franks [REDACTED]

Subject: Draft press line - donations from Christopher Harborne

Hi all,

First draft of a line about donations from Christopher Harborne.

Q: Do you have concerns about the permissibility of donations from Mr Harborne?

A: In order to be a permissible donor, an individual must be on a UK electoral register at the time of the donation. This includes overseas electors. We are satisfied that Mr Harborne is on an a UK electoral register at this time. We are aware of reports that Mr Harborne may also be known by another name. We are in contact with The Brexit Party about this.

Ta,
Maj

Majella La Praik
Head of Registration and Reporting

The Electoral Commission

electoralcommission.org.uk

[REDACTED]

From: [REDACTED]
Sent: 04 September 2019 14:13
To: John Franks; [REDACTED]
Subject: RE: Q2, 2019 donations CCM:0336711

[REDACTED] have come back and confirmed that Mr Harborne was on their overseas electors register on the date of donation.

[REDACTED]
Financial Reporting Adviser

The Electoral Commission
electoralcommission.org.uk

From: John Franks
Sent: 04 September 2019 13:50
To: [REDACTED]
Subject: RE: Q2, 2019 donations CCM:0336711

Try the following address and post code to locate the LA/electoral roll:

[REDACTED]

It's from a donation he made to the Tories in 2001.

From: [REDACTED]
Sent: 04 September 2019 13:21
To: [REDACTED]
Cc: John Franks [REDACTED]
Subject: RE: Q2, 2019 donations CCM:0336711

Hi [REDACTED]

No full address for Mr Harborne, at least not from looking back at the last few times he's donated to the Conservative Party.

His address on PEF online returns is listed as:

Other Electors
[REDACTED]
United Kingdom
ZZ0 0ZZ

I'll email [REDACTED] council now asking them to confirm whether Mr Harborne was registered as an overseas elector at the time of his donation to The Brexit Party.

[REDACTED]
Financial Reporting Adviser

The Electoral Commission

electoralcommission.org.uk

From: [REDACTED]
Sent: 04 September 2019 12:26
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Q2, 2019 donations CCM:0336711

Hi [REDACTED],

Thanks for this. Do we have a full address for Mr Harborne anywhere? If he has donated before we should have some details which may make it easier to identify which of the 108 registers to check. If not, then yes, please do contact them directly.

Cheers,

From: [REDACTED]
Sent: 04 September 2019 11:53
To: [REDACTED]
Cc: John Franks [REDACTED]
Subject: RE: Q2, 2019 donations CCM:0336711

Hi [REDACTED]

I've gone through the [REDACTED] 2019 updates and haven't found Christopher Harborne anywhere.

I wonder whether he might be actually registered in the [REDACTED] local authority (which neighbours [REDACTED] and also contains part of the [REDACTED] parliamentary constituency that Mr A'Zami says Mr Harborne is registered in). Additionally, I checked on PEF online and when Mr Harborne also donated to the Conservative Party in Q2 2019, this is the local authority they provided for him.

The [REDACTED] 2018 register is divided into 108 area spreadsheet, with overseas electors interspersed in the area registers, so I would rather contact the LA directly than sift through 106 spreadsheets, seeing as we have no UK address details for Mr Harborne that would narrow down the search.

Should I get on and contact [REDACTED] (and possibly [REDACTED] about Mr Harborne or do you think we should get some further information from The Brexit Party about where they think Mr Harborne is registered and thus how they know that he's permissible?

[REDACTED]

Cheers

[REDACTED]
Financial Reporting Adviser

The Electoral Commission
electoralcommission.org.uk

From: [REDACTED]
Sent: 03 September 2019 17:03
To: [REDACTED]
Cc: John Franks [REDACTED]
Subject: FW: Q2, 2019 donations CCM:0336711

Hi All,

We have received a response from the Brexit Party about the incorrect addresses reported in their Q2 return.

I have checked the ones that I can however there are a couple that can't be checked because we don't have the registers.

[REDACTED] could you split the list of actions between you please? The actions are listed in red in the email below but for clarity it involves contacting the following LA's:

[REDACTED]

Cheers,

[REDACTED]

From: Mehrtash A'zami [REDACTED]
Sent: 03 September 2019 16:16
To: [REDACTED]
Cc: Party Secretary [REDACTED]
Subject: Q2, 2019 donations

Dear [REDACTED]

Thank you for your email of August 29th which highlighted some concerns with our Q2 donation return. You highlighted 5 concerns.

1/ Re: Mr Christopher Harborne.

Mr Harborne is an overseas elector and is registered as an overseas elector for [REDACTED] Parliamentary Constituency and [REDACTED]. He is, therefore, a permissible donor.

Not on the overseas registers for [REDACTED] ([REDACTED] doesn't exist). However, these registers were published in December so Mr Harborne could have registered in 2019.

Action: Contact LA

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Sent:
Subject:

15 June 2020 12:46
RE: UPDATE Q2, 2019 donations CCM:0336723

On Fri, Sep 6, 2019 at 4:25 PM [REDACTED] wrote:

Dear Mehrtash,

Thank you for your response, I have a few follow up queries.

1) **Update:** Thank you for confirming that Mr Harborne is an overseas elector. [REDACTED]
[REDACTED] Borough Council confirmed that he is registered with them as an overseas elector. We have no further queries in relation to this donation.

[REDACTED]

[REDACTED]

Action: Please confirm the correct address and postcode. If you are unable to provide an alternative address or, unable to explain how permissibility was checked, we will have to assume this is an impermissible donation.

[REDACTED]

[REDACTED]

Kind regards,

[REDACTED]

From: Mehrtash A'zami [REDACTED]
Sent: 03 September 2019 16:16
To: [REDACTED] John Franks [REDACTED]
Cc: Party Secretary [REDACTED]
Subject: Q2, 2019 donations

Dear [REDACTED]

Thank you for your email of August 29th which highlighted some concerns with our Q2 donation return. You highlighted 5 concerns.

1/ Re: Mr Christopher Harborne.

Mr Harborne is an overseas elector and is registered as an overseas elector for [REDACTED] Parliamentary Constituency and [REDACTED] Constituency. He is, therefore, a permissible donor.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

We verify all donations over £500 for their permissibility that includes obtaining confirmation from the relevant electoral registers, and in the case of company donations (over £500) we check the details at Companies House. We also retain the relevant supporting documentation of the verification process.

Many thanks for pointing out these discrepancies and allowing us the opportunity to correct them.

I am sure you will be in touch if you have further questions.

Kind regards

Mehrtash

--



Mehrtash A'Zami

MSc (Econ), FCCA, Chartered MCSI

Treasurer, The Brexit Party

[REDACTED]



[REDACTED]

From: [REDACTED]
Sent: 04 September 2019 14:14
To: 'Electoral Reg'
Subject: RE: 04/09/19 Permissibility check CCM:0488126

Dear [REDACTED]

Many thanks for getting back to me so quickly and for your confirmation.

Kind regards

[REDACTED]
Financial Reporting Adviser

The Electoral Commission
electoralcommission.org.uk

From: Electoral Reg
Sent: 04 September 2019 13:47
To: [REDACTED]
Subject: RE: 04/09/19 Permissibility check CCM:0488126

Dear [REDACTED]

Thank you for your email.

Yes I can confirm that Mr Christopher Harborne was registered as an overseas elector on the given day 4 April 2019.

Kind regards,

[REDACTED]
Elections Manager
[REDACTED] Borough Council



From: [REDACTED]
Sent: 04 September 2019 13:29
To: [REDACTED]
Cc: Electoral Reg <ereg@electoralcommission.org.uk>
Subject: 04/09/19 Permissibility check CCM:0488126

[REDACTED]

Dear [REDACTED],

I hope this email finds you well.

I am currently running some permissibility checks on political donors and was hoping you could confirm whether the following individual was on your electoral register as an overseas elector on the given day:

Mr Christopher Harborne 04/04/2019

Thank you in advance for your assistance.

Kind regards

[REDACTED]
Financial Reporting Adviser

The Electoral Commission
electoralcommission.org.uk

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[REDACTED]

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[REDACTED]

From: [REDACTED]
Sent: 29 August 2019 16:54
To: John Franks
Cc: [REDACTED]
Subject: RE: Brexit Party Q2 email Draft CCM:0336700

Cheers, I've added the enforcement line. Happy for this to go out?

[REDACTED]

From: John Franks
Sent: 29 August 2019 16:49
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Brexit Party Q2 email Draft CCM:0336700

Hi [REDACTED]

See my additions below. Also, we should add a line about the enforcement policy.

Thanks

John

From: [REDACTED]
Sent: 29 August 2019 14:55
To: John Franks [REDACTED]
Subject: Brexit Party Q2 email Draft CCM:0336700

Dear Mehrtash,

I am writing concerning The Brexit Party's quarter 2 donation return which appears to contain a number of inaccuracies.

I have listed these below and highlighted the required action for each.

- 1) You have reported that a donation was accepted from Mr Christopher Harborne of [REDACTED]
[REDACTED] As you are aware, political parties are not permitted to receive funds from individuals who are not registered on the UK electoral roll. **We will treat this donation, and any further donations from this donor, as impermissible unless you are able to provide the address at which the donor is registered on a UK electoral roll.**

Action: Please confirm whether Mr Harborne is an overseas elector and if so, which Local Authority he is registered with.

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 15 November 2019 13:10
To: John Franks
Cc: [REDACTED]
Subject: RE: Permissibility check

John,

We have found Christopher Harborne under [REDACTED] ' which is part of the Full Register – December 2018.

Thanks,

[REDACTED]

[REDACTED]
Financial Reporting Adviser

The Electoral Commission

[REDACTED]
electoralcommission.org.uk

From: [REDACTED]
Sent: 15 November 2019 12:56
To: John Franks ; [REDACTED]
Subject: RE: Permissibility check

Hi John,

Leave it with me, I'll check it out.

[REDACTED]

[REDACTED]
Financial Reporting Adviser

The Electoral Commission

[REDACTED]
electoralcommission.org.uk

From: John Franks [REDACTED]
Sent: 15 November 2019 12:41

To: [REDACTED]

Subject: Permissibility check

Importance: High

[REDACTED]

Could one of you check the permissibility of the following donor?

He gave to the party in Q2 and was permissible when we checked. He is an overseas voter and, as such, can remain on the electoral roll in the authority that he was last registered in before moving overseas.

The donations he made were received by the party on the following dates:

09/07/2019

23/08/2019

28/08/2019

His name:

Mr Christopher Harborne

[REDACTED]

And the relevant local authority is [REDACTED].

John Franks

Financial Reporting Manager

The Electoral Commission

[REDACTED]
electoralcommission.org.uk

[REDACTED]

From: John Franks
Sent: 24 September 2019 13:07
To: [REDACTED]
Cc: Mathias Rosengren
Subject: RE: The Brexit Party - Q2 Donation Return

[REDACTED]

Can you update me on where we got to with the following:

- C0406501 Mr Christopher Harborne – did we confirm that he was on an electoral roll?

- [REDACTED]

And are the other details correct?

Many thanks

John

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [John Franks](#)
To: [REDACTED]
Subject: RE: In the News - Thursday 30 April 2020
Date: 30 April 2020 12:11:16
Attachments: [image001.png](#)

[REDACTED]

[REDACTED]

Private Eye (p39, no link) looks at donations to the Brexit Party from Christopher Harborne. Also comments on the party's status registered as a limited company.

[REDACTED]

Communications Officer
The Electoral Commission
[REDACTED]
electoralcommission.org.uk

From: [Louise Edwards](#)
To: [Majella La Praik](#); [John Franks](#)
Subject: Re: Large donors in Q4 (draft list of donation(s) of £500,00 and over)
Date: 25 February 2020 06:45:00

I'm getting the LTT today to look at. I'll make sure there is something in there about our position on the extraordinary size of this quarter (broadly, a matter for parties combined with isn't transparency great).

Thanks

From: Majella La Praik
Sent: 24 February 2020 03:08:44
To: John Franks; Louise Edwards
Subject: RE: Large donors in Q4 (draft list of donation(s) of £500,00 and over)
Thanks for sharing – if you haven't already, might be good to share with press for their information.

From: John Franks
Sent: 21 February 2020 17:12
To: Louise Edwards
Cc: Majella La Praik
Subject: Large donors in Q4 (draft list of donation(s) of £500,00 and over)
Largest donors in Q4 :

Conservative and Unionist Party

Arbuthnot Banking Group Plc,	£524,000
Bridgemere UK PLC,	£1,000,000
Countywide Developments Ltd,	£625,751
IPGL Ltd	£1,055,250
J.C.B. Services, Lakeside Works	£907,500
J.S. Bloor (Services) Ltd	£962,000
JC Bamford Excavators Ltd	£2,425,979
John Gore	£1,000,000
Mercantile and Maritime UK Limited	£500,000
David Tilles	£500,000
John Dorrien Caudwell	£500,000
Jonathan Wood	£1,000,000
Malcolm S Healey	£750,000
Peter Wood	£1,000,000
Ann R Said	£505,418
Paul Marshall	£500,000
Peter K Hargreaves	£1,000,000
Trailfinders Limited	£500,000
WA CAPITAL LIMITED	£500,000

Labour Party

Communication Workers Union,	£717,744
GMB,	£921,685

USDAW	£705,871
UNISON	£898,242
UNITE	£4,941,474

Liberal Democrats

Lord David Sainsbury	£8,000,000
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The Brexit Party

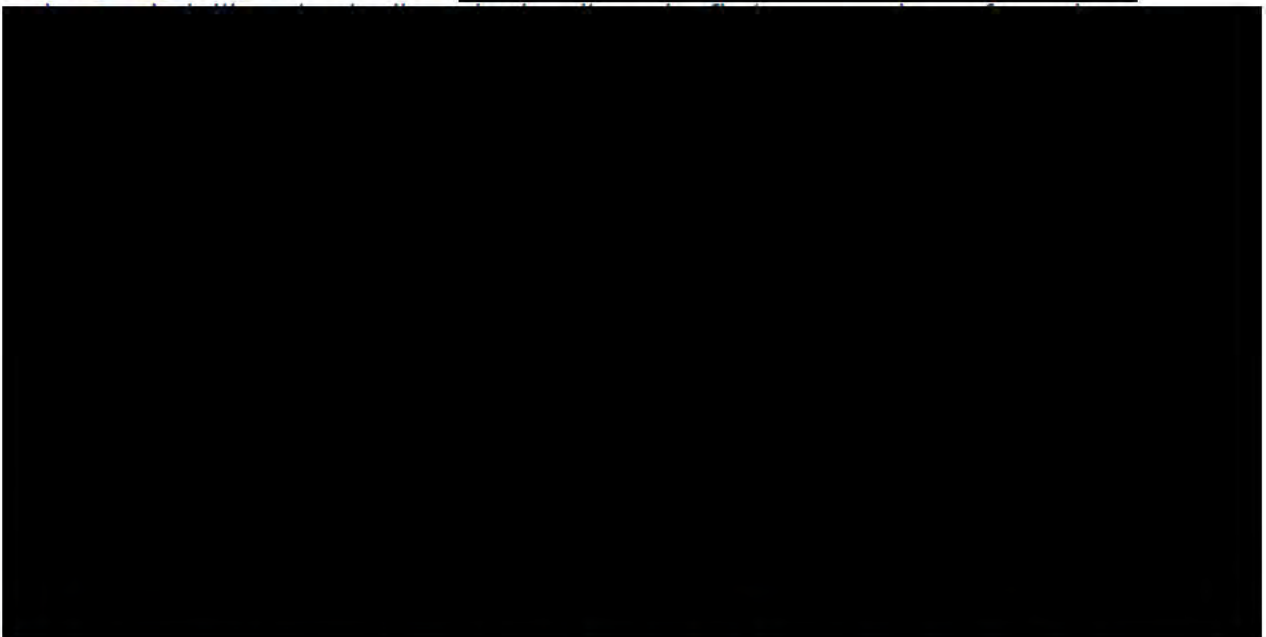
Christopher Harborne	£6,525,000
Jeremy Hosking	£625,000

H [REDACTED] – thanks for this. Please go ahead and ask the party for any missing information you need for publication.

From: [REDACTED]
Sent: 19 August 2019 10:27
To: Majella La Praik [REDACTED]
Cc: John Franks [REDACTED]
Subject: RE: Q2 - The Brexit Party

Hi Majella,

Last week you asked me to take a close look at the Brexit Party's Q2 return and identify any compliance issues. [REDACTED]



Donor name	Donor Type	Value	Received Date	Accepted/Returned Date	Issue
[REDACTED]					
Mr Christopher	Individual	£200,000.00	04/04/2019	04/04/2019	No issue, accepted on 0 days.

Harborne,

[illegible]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Cheers,

[REDACTED]

From: Majella La Praik

Sent: 15 August 2019 16:20

To: [REDACTED]

Subject: Q2 - The Brexit Party

H [REDACTED]

We discussed that you would have a look at the Q2 return from The Brexit Party and identify any potential compliance issues. Could you put a list together by close on Tuesday? If that's not realistic then let me know ASAP.

Ta,
Maj

Majella La Praik

Interim Head of Registration and Reporting

The Electoral Commission

020 7271 0693

electoralcommission.org.uk