

From: [FOI](#)  
To: [REDACTED]  
Cc: [FOI](#)  
Subject: Freedom of Information - Communication with Vote Leave 186/17 - Response  
Date: 29 January 2018 17:12:34  
Attachments: [Vote Leave 6 12-08-16.pdf](#)  
[Vote Leave 7 13-09-16.pdf](#)  
[Vote Leave 8 21-09-16.pdf](#)  
[Vote Leave 9 08-12-16.pdf](#)  
[Vote Leave 14 23-02-17.pdf](#)  
[Vote Leave 17 11-07-17.pdf](#)  
[EC to DH re FOI1.pdf](#)  
[Vote Leave 1 07-07-16.pdf](#)  
[Vote Leave 3 12-07-16.pdf](#)  
[Vote Leave 4 14-07-16.pdf](#)  
[Vote Leave 5 11-08-16.pdf](#)

---

Dear [REDACTED],

**Our Ref: FOI 186/17**

Thank you for your email to the Electoral Commission dated **26 November 2017**.

The Commission aims to respond to requests for information promptly and regrets that on this occasion we have not done so.

Your request is in bold below followed by our response.

**I am writing to make a request under the Freedom of Information Act for:**

**1. A list of all email and document-based (for example but not limited to letter, memo, fax, etc) communication between the Electoral Commission and Vote Leave (including any recognised members of Vote Leave), between 1 January 2016 and today's date, 26 November 2017. For each item in the list, please provide the date the communication was sent or received, the name of the sender and recipient, the title or reference of the item, and a summary description of the item's contents.**

**2. Copies of all the email and document-based (for example but not limited to letter, memo, fax, etc) communication between the Electoral Commission and Vote Leave (including any recognised members of Vote Leave), between 1 January 2016 and today's date, 26 November 2017.**

**If my request is refused either in whole or in part, please make specific reference to exemptions within FOIA.**

Our response is as follows:

We hold the information you have requested.

The Commission has previously released correspondence under a FOI request from 1 January 2016 to 30 June 2016 between us and Vote Leave (see [here](#)). This includes correspondence with individuals associated with Vote Leave. Therefore, this request releases relevant correspondence between 1 July 2016 and 26 November 2017.

You will find the name of the sender/ receiver of the correspondence and dates in

the attached correspondence. We have not provided you with a list or a summary of the items' contents as we are not required to do this under the Act.

### **Exemptions under Section 31**

You will be aware that the Commission has opened an investigation into Vote Leave's EU referendum spending return (see statement on our website [here](#)). In light of this investigation, the Commission has applied exemptions to some correspondence which relates to this investigation. This includes correspondence prior to the opening of the investigation which forms part of our investigation. Section 31(1)(g) of the FOI Act provides for exemption from disclosure of information which has been held at any time for a variety of law enforcement interests. For example, information may be exempt under section 31(1)(g) if its disclosure under the FOI Act would, or would be likely to, prejudice the prevention or detection of crime. The exemption under section 31(1)(g) is subject to the public interest test. We are satisfied that given the ongoing investigation it is not in the public interest to release this information.

### **Exemptions under Section 40**

You will notice that certain personal details have been redacted from the documents we are releasing. This redaction is necessary because section 40(2) and (3)(a) of the Freedom of Information Act 2000 (FOI) Act provides that personal data, where its disclosure would breach one of the data protection principles, is exempt from disclosure. The first data protection principle states that personal data must be processed fairly and lawfully. The Commission considers that it would be unfair to release the names and personal contact details of junior officials, who were not employed in public facing roles and did not act as spokespersons for their employer, as those individuals would have a reasonable expectation that this personal data would not be disclosed to the general public.

I trust that this information satisfies your request. The Commission strives to be an open, transparent authority. 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: <http://www.electoralcommission.org.uk/about-us/freedom-of-information-requests/how-do-i-make-an-foi-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 Management Adviser**

The Electoral Commission

3 Bunhill Row

London EC1Y 8YZ

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[yourvotematters.co.uk](http://yourvotematters.co.uk)

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[REDACTED]

**From:** Alan Halsall [REDACTED]  
**Sent:** 29 September 2017 11:53  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Re: Electoral Commission Audit

Dear [REDACTED]  
Thanks for your e mail.  
Subject to usual protections on personal data we can see no problem with this at all.  
Best wishes  
David Halsall on behalf of Vote Leave Ltd

On 28 Sep 2017, at 12:36, [REDACTED] > wrote:

Dear David

We have received a Freedom of Information (FOI) request relating to correspondence between the Electoral Commission and Vote Leave between January and June 2016. The request is below:

**1) I would like to request all internal correspondence and communications between the Electoral Commission and Vote Leave between Jan and June 2016.**

**2) 1) I would like to request all internal correspondence and communication between Jan and June 2016 held by the Electoral Commission that mentions, or refers to, Vote Leave's Dominic Cumminings.**

We are taking a wide interpretation of this FOI request and will disclose any relevant internal and external correspondence. If you have any concerns then please let me know.

Regards  
[REDACTED]

[REDACTED]  
**Party Finance Guidance Manager**  
**Electoral Administration and Guidance**  
The Electoral Commission  
3 Bunhill Row  
London EC1Y 8YZ

[REDACTED]  
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## Democracy matters



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----- Original Message -----

**From:** Victoria Woodcock

**Received:** 07/07/2016 09:20

**To:** Antonia Flockton; Antonia Flockton

**Cc:** David Alan Halsall; [REDACTED]

**Subject:** Re: Signed

Hi [REDACTED],

I just wanted to stress that all staff will have left by 30th August and Antonia and Antonia and I will actually be on holiday after the 15th August. Our auditors are coming in the week of the 18th July so it would be helpful to know when you will be coming in and what you would be looking for so that we can plan.

We will be aiming to submit our final report by the end of August.

Thanks,

Vicky

On Mon, Jul 4, 2016 at 1:22 PM, Antonia Flockton [REDACTED] wrote:  
Dear [REDACTED]

Did you have any thoughts on the date for a visit?

Kind regards,

Antonia

Antonia Flockton  
Finance Director, Vote Leave  
[REDACTED]

*We send £350m to the EU every week. After we **Vote Leave** we can spend this money on our priorities like the NHS.*

On Wed, Jun 22, 2016 at 9:11 AM, Antonia Flockton [REDACTED] wrote:  
Dear [REDACTED]

Thank you. I look forward to hearing from your colleagues.

On a separate matter, you were to come back to me with dates for a visit in relation to the expenditure report and audit. Most staff will leave Vote Leave as of 1 July. As things stand, [REDACTED]  
[REDACTED] Please could you suggest some dates. Diaries are relatively clear here post 23 June.

Kind regards,

Antonia

Antonia Flockton  
Finance Director, Vote Leave  
[REDACTED]

*We send £350m to the EU every week. After we **Vote Leave** we can spend this money on our priorities like the NHS.*

On Tue, Jun 21, 2016 at 1:53 PM, [REDACTED] wrote:

Dear Antonia,

Thank you for sending though this letter.

We have deleted the donation as requested and this will take effect as of now. Separately colleagues will be in touch concerning the late return of the donation as per our [Enforcement Policy](#).

If you have any further questions please let me know.

Kind regards,

[REDACTED]

[REDACTED]

**Guidance Adviser**

Party and Election Finance

The Electoral Commission

3 Bunhill Row

London EC1Y 8YZ

Tel: [REDACTED]

Fax: [REDACTED]

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## Putting Voters First

P Please consider the environment before printing this email.

**From:** Antonia Flockton [REDACTED]  
**Sent:** 20 June 2016 15:49  
**To:** [REDACTED]  
**Cc:** Alan Halsall; Victoria Woodcock  
**Subject:** Fwd: Signed

Dear Sirs,

Please find attached a letter from our responsible person, David Alan Halsall.

Kind regards,

Antonia Flockton

--

**Victoria Woodcock**  
Operations Director, Vote Leave



*We send **£350m** to the EU every week. Don't forget to **Vote Leave** on **23 June**.*

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Facebook: [voteleave](https://www.facebook.com/voteleave)

----- Original Message -----

**From:** Victoria Woodcock

**Received:** 12/07/2016 17:12

**To:** [REDACTED]

**Cc:** David Alan Halsall; [REDACTED] Matthew Elliott

**Subject:** Re: FOI 71/16 - Vote Leave

Hi [REDACTED],

Please see my comments below. We believe that the letters regarding Ryanair act as a complaint (although the early letters were a notification of an issue you should look in to).

1. councils over late supply of absent voter lists (1.1-1.6) - agree this is a complaint
2. misleading postal vote guidance (2) agree this is a complaint
3. EU citizens receiving postal ballots (3-5.2) agree this is a complaint
4. French industrialists for Remain ad (6) we do not believe this was a complain but a notification of an issue that you should look into
5. treating by Operation Croissant (7) we do not believe this was a complain but a notification of an issue that you should look into
6. letters to the Commission regarding the ITV debate (minus the exchange between you and ITV) (8) agree this is a complaint

Thanks and sorry for the delay in reply.

Vicky

On Tue, Jul 12, 2016 at 4:58 PM, [REDACTED] > wrote:

Vicky,

I wanted to advise you will be releasing the FOI request with the below documents shortly. Also, if you have any objections to us confirming that that Vote Leave made a complaint to the Commission about Ryanair I would be grateful if you could let us know by 11am tomorrow 13 July.

Kind regards,

[Redacted]

[Redacted]

**Guidance Adviser**

Party and Election Finance

The Electoral Commission

3 Bunhill Row

London EC1Y 8YZ

[Redacted]

[Redacted]

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**From:** [Redacted]  
**Sent:** 08 July 2016 14:18  
**To:** 'Victoria Woodcock'  
**Cc:** Dominic Cummings; Matthew Elliott; Alan Halsall  
**Subject:** RE: FOI 71/16 - Vote Leave

Vicky,

Sorry for the delay in getting back to you. After consulting with our legal team we have now agreed on the scope of the FOI request. Below is a summary of the revised documents that will be sent. I have also attached the redacted versions of the files to this email.

1. councils over late supply of absent voter lists (1.1-1.6)
2. misleading postal vote guidance (2)
3. EU citizens receiving postal ballots (3-5.2)
4. French industrialists for Remain ad (6)
5. treating by Operation Croissant (7)
6. letters to the Commission regarding the ITV debate (minus the exchange between you and ITV) (8)

As per the FOI we have included copies of complaints by you about the conduct of the Electoral Commission and any other organisations. This includes not just formal complaints but also allegations against or criticism of another body where you asked us to investigate or intervene in some way.

If you believe that any of these documents should be exempt from the FOI can you please let us know by close of business on Monday 11 July.

I am happy to discuss this with you if you have any questions.

Kind regards,



[Redacted]

**Guidance Adviser**

Party and Election Finance

The Electoral Commission

3 Bunhill Row

London EC1Y 8YZ

[Redacted]

[Redacted]

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P Please consider the environment before printing this email.

**From:** Victoria Woodcock [Redacted]  
**Sent:** 07 July 2016 14:41  
**To:** [Redacted]; Dominic Cummings; Matthew Elliott; Alan Halsall  
**Subject:** Re: FOI 71/16 - Vote Leave

[Redacted],

I am not sure that some of these constituent a complaint. A lot of these are Vote Leave simply copying the Electoral Commission into letters, or passing on information for the Electoral Commission to look into. I would very much like to see the responses before you publish them and would welcome a conversation about why some of these are being considered a complaint.

Matthew/Dom/Alan please see the chain below.

Many thanks,

Vicky

On Thu, Jul 7, 2016 at 1:10 PM, [REDACTED] > wrote:

Dear Vicky,

Thank you for your email.

We are still in the process of redacting the documents. I can confirm that we have communications covering the following topics:

1. 27 Councils over late supply of absent voter lists
2. the grant process
3. event run at the British Museum
4. Ryanair
5. Postal votes in Aylesbury District Council
6. Misleading postal vote guidance
7. EU citizens receiving postal ballots
8. Treating by operation croissant

- 9. French industrialists for Remain ad
- 10. Letters to BuzzFeed, Google, Bite the Ballot, Twitter, Facebook, TheLadBible, Tinder and Uber
- 11. Exchange with ITV and letters to the Commission regarding the ITV debate

We are happy to send the redacted versions to you later tonight. We will be removing personal details from the documents.

Happy to discuss.

Kind regards,

[Redacted]

[Redacted]

**Guidance Adviser**

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[Redacted]

[Redacted]

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## Putting Voters First

P Please consider the environment before printing this email.

**From:** Victoria Woodcock [REDACTED]  
**Sent:** 07 July 2016 09:10  
**To:** [REDACTED]  
**Subject:** Re: FOI 71/16 - Vote Leave

Will we see anything you are releasing before it is released?

Thanks,

Vicky

On Mon, Jul 4, 2016 at 4:19 PM, [REDACTED] wrote:

Dear Vicky

I am writing to you in connection with a request for information received by The Electoral Commission which is being considered under Freedom of Information (FOI) Act. Part of the information requested was relates to you.

**Please provide copies of complaints made by Vote Leave Limited to the Electoral Commission about the conduct of the Electoral Commission or any other organisations, sent since 1 March 2016.**

The FOI Act requires the Commission to disclose information in response to a request unless an exemption applies. There are two types of exemption in the FOI Act.

The first type is an ‘absolute’ exemption, whereby disclosure may be withheld if the information falls within the terms of the exemption in question. However, where the exemption in question is only covered by a ‘qualified’ exemption, we can only withhold the information if the balance of the public interest, in all the circumstances of the case, favours non-disclosure of the information.

In light of the fact that you provided this information to us, we are informing you of this request. If you wish to notify us of any particular issues or considerations that you consider relevant to the question of disclosure of this information, please let me have written details of how, in your view, disclosure of the information would be harmful by **12.00pm 7 July 2016**. This is to enable us to consider all relevant factors in taking a decision on whether the Freedom of Information Act 2000 requires this information to be disclosed.

If you have any queries about this email, please contact me.

Yours sincerely,

[Redacted Signature]

**Guidance Adviser**

Party and Election Finance

The Electoral Commission

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[Redacted Address Line]

[Redacted Address Line]

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**Victoria Woodcock**  
Operations Director, Vote Leave

[Redacted]

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Facebook: [voteleave](https://www.facebook.com/voteleave)

----- Forwarded message -----

From: [Redacted]  
[Redacted]

Cc:

Date: Tue, 12 Jul 2016 16:54:55 +0100  
Subject: FW: Ryanair

---

**From:** [REDACTED]  
**Sent:** 11 July 2016 14:39  
**To:** 'Victoria Woodcock'  
**Subject:** Ryanair  
**Importance:** High

Dear Victoria,

In relation to a Freedom of Information Act request we have received; are you happy if we were to confirm as part of our answer that Vote Leave made a complaint to the Commission about Ryanair prior to the Referendum of 23 June 2016?

I would be grateful if you could let me know your thoughts when convenient.

Kind regards,

[REDACTED]

**Senior Investigator**

**Casework and Investigations Team**

**Party and Election Finance**

The Electoral Commission

3 Bunhill Row  
London EC1Y 8YZ  
Tel: [REDACTED]

Fax: [REDACTED]

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**Victoria Woodcock**  
Operations Director, Vote Leave

[REDACTED]

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Twitter: [@vote\\_leave](#)  
Facebook: [voteleave](#)

----- Original Message -----

**From:** Victoria Woodcock

**Received:** 14/07/2016 10:46

**To:** [REDACTED]

**Subject:** Re: Campaign Posters Northern Ireland

[REDACTED]  
[REDACTED] was our regional director in Northern Ireland.

Thanks,

Vicky

On Thu, Jul 14, 2016 at 10:18 AM, [REDACTED] wrote:

Vicky,

We have been contacted by TransportNI about campaign posters that have not been removed in Northern Ireland. They have not confirmed if any posters relate to your campaign.

They would like to get in contact with campaigners. Would it be possible for you to share with me the details of any Northern Ireland co-ordinators you have or failing that can I give them your email address?

Many thanks,

[REDACTED]

[REDACTED]

**Guidance Adviser**

Party and Election Finance

The Electoral Commission

3 Bunhill Row

London EC1Y 8YZ

Tel: [REDACTED]

Fax: [REDACTED]

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**Victoria Woodcock**  
Operations Director, Vote Leave

[REDACTED]

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Twitter: [@vote\\_leave](#)  
Facebook: [voteleave](#)

[REDACTED]

---

[REDACTED]

----- Original Message -----

**From:** Victoria Woodcock

**Received:** 11/08/2016 10:55

**To:** [REDACTED]

**Subject:** Re: FOI 71/16 - Vote Leave

We are happy with this. Thank you for letting us know.

Vicky

On Wed, Aug 10, 2016 at 10:26 AM, [REDACTED] wrote:

Vicky,

We have had a further FOI (due on Friday) that has requested the Electoral Commission responses to the below complaints. The FOI request was:

The [above request](#) (link inserted) discloses complaints made by Vote Leave, but not the EC response to those complaints.

**Please provide the EC response, as in the other half of the exchanges.**

I have attached the material that will be published in the FOI to this email. The only new material will be our responses to the complaints.

As discussed before, the FOI Act requires the Commission to disclose information in response to a request unless an exemption applies. If you think an exemption would apply to any of our responses to your complaints can you please let me know by Friday at 1.00pm.

I am happy to discuss this with you further.

Kind regards,

[Redacted]

[Redacted]

**Guidance Adviser**

Party and Election Finance

The Electoral Commission

3 Bunhill Row

London EC1Y 8YZ

[Redacted]

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P Please consider the environment before printing this email.

**From:** Victoria Woodcock [Redacted]  
**Sent:** 07 July 2016 14:41  
**To:** [Redacted]; Dominic Cummings; Matthew Elliott; Alan Halsall  
**Subject:** Re: FOI 71/16 - Vote Leave

[REDACTED],

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Matthew/Dom/Alan please see the chain below.

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Happy to discuss.

Kind regards,

[Redacted]

[Redacted]

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[Redacted]

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If you have any queries about this email, please contact me.

Yours sincerely,

[Redacted Signature]

**Guidance Adviser**

Party and Election Finance

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[Redacted Contact Information]

[Redacted Contact Information]

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**Victoria Woodcock**  
Operations Director, Vote Leave



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Facebook: [voteleave](https://www.facebook.com/voteleave)

[REDACTED]

---

----- Original Message -----

**From:** Victoria Woodcock

**Received:** 12/08/2016 17:38

**To:** [REDACTED]

**Subject:** Re: FOI 71/16 - Vote Leave

Yes this is fine thank you.

Vicky

On Fri, Aug 12, 2016 at 8:53 AM, [REDACTED] > wrote:

Vicky,

We publish any senior individual that is clearly associated with a campaign or mentioned on the official register through PEF Online.

With internal staff we publish the names of any senior staff member (Manager, Head, Director etc.)

After checking Vote Leave's [registration](#) on PEF Online the registered officers are you and Alan Halsall. On this basis I will leave in your name and Alan Halsall's name. I would also leave in Matthew Elliot as he is clearly associated with the campaign publically.

Let me know if you have any further questions.

Kind regards,

[REDACTED]

[REDACTED]

**Guidance Adviser**

Party and Election Finance

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[REDACTED]

[REDACTED]

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P Please consider the environment before printing this email.

**From:** Victoria Woodcock [REDACTED]  
**Sent:** 11 August 2016 11:32  
**To:** [REDACTED]  
**Subject:** Re: FOI 71/16 - Vote Leave

One thing can Matthew and Alan's name not be redacted too?

On Wed, Aug 10, 2016 at 10:26 AM, [REDACTED] wrote:

Vicky,

We have had a further FOI (due on Friday) that has requested the Electoral Commission responses to the below complaints. The FOI request was:

**The [above request](#) (link inserted) discloses complaints made by Vote Leave, but not the EC response to those complaints.**

**Please provide the EC response, as in the other half of the exchanges.**

I have attached the material that will be published in the FOI to this email. The only new material will be our responses to the complaints.

As discussed before, the FOI Act requires the Commission to disclose information in response to a request unless an exemption applies. If you think an exemption would apply to any of our responses to your complaints can you please let me know by Friday at 1.00pm.

I am happy to discuss this with you further.

Kind regards,

[REDACTED]

[REDACTED]

## Guidance Adviser

Party and Election Finance

The Electoral Commission

3 Bunhill Row

London EC1Y 8YZ

[REDACTED]

[REDACTED]

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## Putting Voters First

P Please consider the environment before printing this email.

**From:** Victoria Woodcock [REDACTED]  
**Sent:** 07 July 2016 14:41  
**To:** [REDACTED]; Dominic Cummings; Matthew Elliott; Alan Halsall  
**Subject:** Re: FOI 71/16 - Vote Leave

[REDACTED],

I am not sure that some of these constitute a complaint. A lot of these are Vote Leave simply copying the Electoral Commission into letters, or passing on information for the Electoral Commission to look into. I would very much like to see the responses before you publish them and would welcome a conversation about why some of these are being considered a complaint.

Matthew/Dom/Alan please see the chain below.

Many thanks,

Vicky

On Thu, Jul 7, 2016 at 1:10 PM, [REDACTED] > wrote:

Dear Vicky,

Thank you for your email.

We are still in the process of redacting the documents. I can confirm that we have communications covering the following topics:

1. 27 Councils over late supply of absent voter lists
2. the grant process
3. event run at the British Museum
4. Ryanair
5. Postal votes in Aylesbury District Council
6. Misleading postal vote guidance
7. EU citizens receiving postal ballots
8. Treating by operation croissant
9. French industrialists for Remain ad
10. Letters to BuzzFeed, Google, Bite the Ballot, Twitter, Facebook, TheLadBible, Tinder and Uber
11. Exchange with ITV and letters to the Commission regarding the ITV debate

We are happy to send the redacted versions to you later tonight. We will be removing personal details from the documents.

Happy to discuss.

Kind regards,

[Redacted]

[Redacted]

**Guidance Adviser**

Party and Election Finance

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[Redacted]

[Redacted]

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**Putting Voters First**

P Please consider the environment before printing this email.

**From:** Victoria Woodcock [REDACTED]  
**Sent:** 07 July 2016 09:10  
**To:** [REDACTED]  
**Subject:** Re: FOI 71/16 - Vote Leave

Will we see anything you are releasing before it is released?

Thanks,

Vicky

On Mon, Jul 4, 2016 at 4:19 PM, [REDACTED] wrote:

Dear Vicky

I am writing to you in connection with a request for information received by The Electoral Commission which is being considered under Freedom of Information (FOI) Act. Part of the information requested was relates to you.

**Please provide copies of complaints made by Vote Leave Limited to the Electoral Commission about the conduct of the Electoral Commission or any other organisations, sent since 1 March 2016.**

The FOI Act requires the Commission to disclose information in response to a request unless an exemption applies. There are two types of exemption in the FOI Act.

The first type is an 'absolute' exemption, whereby disclosure may be withheld if the information falls within the terms of the exemption in question. However, where the exemption in question is only

covered by a ‘qualified’ exemption, we can only withhold the information if the balance of the public interest, in all the circumstances of the case, favours non-disclosure of the information.

In light of the fact that you provided this information to us, we are informing you of this request. If you wish to notify us of any particular issues or considerations that you consider relevant to the question of disclosure of this information, please let me have written details of how, in your view, disclosure of the information would be harmful by **12.00pm 7 July 2016**. This is to enable us to consider all relevant factors in taking a decision on whether the Freedom of Information Act 2000 requires this information to be disclosed.

If you have any queries about this email, please contact me.

Yours sincerely,

[Redacted Signature]

**Guidance Adviser**

Party and Election Finance

The Electoral Commission

3 Bunhill Row

London EC1Y 8YZ

[Redacted Address Line]

[Redacted Address Line]

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**Putting Voters First**

P Please consider the environment before printing this email.

--

**Victoria Woodcock**  
Operations Director, Vote Leave



*We send £350m to the EU every week. Don't forget to **Vote Leave** on 23 June.*

Website: [www.voteleavetakecontrol.org](http://www.voteleavetakecontrol.org)  
Twitter: [@vote\\_leave](https://twitter.com/vote_leave)  
Facebook: [voteleave](https://www.facebook.com/voteleave)

--

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Facebook: [voteleave](https://www.facebook.com/voteleave)

----- Original Message -----

**From:** Antonia Flockton

**Received:** 13/09/2016 07:43

**To:** [REDACTED]

**Cc:** David Alan Halsall; [REDACTED]; Louise Edwards; Victoria Woodcock; Victoria Woodcock

**Subject:** Re: Electoral Commission Audit

Dear [REDACTED]

I hope you will forgive me for expressing a little frustration over the timing of this. Both Vicky and I stressed that we were looking to wind down operations quickly after the referendum and repeatedly chased an early date for this audit. [REDACTED] There is no one now left at Vote Leave who worked directly on the recording of donations and I am finishing the audit work on a voluntary basis. Additionally, I am in the South of France until 26 September.

Can you be more specific as to what you mean by sending you our financial control procedures? We have written protocols for the processing of donations. The protocols on expenditure controls were to a large extent set out in our designation document. I would appreciate it if you could review that document and let me know if you need anything further on the expenditure side.

I am travelling on 26 September. Otherwise, as the calendar currently stands I can make myself available to walk you through our procedures on any of the other dates suggested. Do you require that Alan is in attendance - I have not checked as to whether he wishes to be?

Kind regards,

Antonia

Antonia Flockton  
Finance Director, Vote Leave  
[REDACTED]

*We send £350m to the EU every week. After we **Vote Leave** we can spend this money on our priorities like the NHS.*

On Mon, Sep 12, 2016 at 3:01 PM, [REDACTED] wrote:

Dear Mr Halsall

As discussed with you in the run up to the referendum, we are now in a position to review what internal financial procedures are in place in your organisation and how you have been and are applying them. The reason for our visit is to better understand how, from a procedural and practical point of view, you have recorded your referendum spending and are completing the spending return. This will then allow us to identify and highlight any risks to help ensure your spending and donation returns are complete and accurate when submitted to us.

We would like to arrange a visit of your offices as part of this review. At this visit we will seek to discuss the financial controls and to see them being used in practice. This may involve looking through examples, or talking to those people working on the donation and spending return.

We would expect to complete the visit inside half a day. Afterwards we will write to you to advise you of our evaluation of your financial controls.

I would be grateful if you could confirm your availability for the following dates:

26 - 28 September

3 - 5 October

10 - 12 October

In advance of the visit, please forward copies of your financial control procedures for our review by 20 September.

Regards



**Manager (Advice and Guidance)**

**Party and Election Finance**

The Electoral Commission

3 Bunhill Row

London EC1Y 8YZ

Tel: 

Fax: 

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**Democracy matters**



Please consider the environment before printing this email.

----- Original Message -----

**From:** Victoria Woodcock

**Received:** 21/09/2016 17:14

**To:** [REDACTED]

**Subject:** Re: Electoral Registers

[REDACTED]

All data was destroyed in July. We have no data left.

Thanks,

Vicky

Sent from my iPhone

On 21 Sep 2016, at 14:32, [REDACTED] wrote:

Dear Vicky,

Now that the EU referendum has taken place, there should be no need for you to retain versions of the electoral register you obtained under the Representation of the People (England and Wales) Regulations 2001 (SI 2001/341) and you should now destroy any paper and electronic versions you received in accordance with the Information Commissioner's Office [guidelines](#), if you have not done so already.

Further information on the permitted purposes for which the electoral register and absent voter lists could be used is available in the guidance: [Campaigning dos and don'ts](#).

Kind regards,

[REDACTED]

[REDACTED]

**Guidance Adviser**

Party and Election Finance

The Electoral Commission

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London EC1Y 8YZ

Tel: [REDACTED]

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### **Putting Voters First**

P Please consider the environment before printing this email.

**From:** Antonia Flockton [REDACTED]  
**Sent:** 08 December 2016 12:43  
**To:** [REDACTED]  
**Cc:** Alan Halsall  
**Subject:** Reporting Donations

Dear [REDACTED]

I had the following questions:

Do I need to record separately all amounts given by any donor who gave over £7,500. By way of example:

[REDACTED] gave several separate amounts of £100,000 and e.g. £2,000 and a non-monetary donation of approx £4,300.

Do I:

- a. Aggregate all the amounts of his donations whether or not monetary or non-monetary and put as the received date the date of the last donation and the treatment date the date that he was accepted? OR
- b. Aggregate all the amounts of his donations whether or not monetary or non-monetary and put as the received date the date on which his donations first exceeded £7,500 and treatment date the date on which he was first accepted; OR
- c. Aggregate all of the amounts of his monetary donations using the received date as the date of the first donation over 500 and treatment date as the date when checked he was an eligible donor and the same but separately for his non-monetary donations only to the extent that they, separately are over £7,500 and they being under £7,500 should only form part of the bulk amount of donations over 500 but under £7,500?
- d. Because his total donations are over £7,500, record all of his donations separately whether or not they were individually over £7,500 and whether or not monetary or non-monetary with the date on which each was received and the date on which he was first accepted as a donor; OR
- e. Record separately and on a named basis only his donations in value over £7,500 and put all his separate donations under £7,500 in the bulk amount for those between £500 and £7,500.

If the answer is c. for those individuals who gave lower individual amounts but which added to over £7,500 do I put all of their separate donations in on each received date or the total amount with the received date, the date on which their donations exceeded £7,500?

I am mindful that the course we followed for the pre-poll donations initially was d. but that you then removed all of the individual donations under £7,500.

A prompt response would be very much appreciated.

Kind regards,

Antonia

Antonia Flockton  
Vote Leave

[REDACTED]

----- Original Message -----

**From:** Antonia Flockton

**Received:** 23/02/2017 17:33

**To:** [REDACTED]

**Cc:** David Alan Halsall; [REDACTED]

**Subject:** Re: line on investigation CCM:0324269

Hi [REDACTED]

Thank you for coming back to me so quickly. We shall look to ensure we don't contradict the letter.

Kind regards,

Antonia

Antonia Flockton

Vote Leave  
[REDACTED]

On Thu, Feb 23, 2017 at 5:28 PM, [REDACTED] wrote:

Hi Antonia,

I am responding on [REDACTED] behalf.

It would not be appropriate for us to comment on your media line. Please refer to our investigation letter for details.

Regards,

[REDACTED]

[REDACTED]

**Senior Financial Reporting Adviser**

Political Finance and Regulation

The Electoral Commission

3 Bunhill Row

London

EC1Y 8YZ

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[www.electoralcommission.org.uk](http://www.electoralcommission.org.uk)

[www.aboutmyvote.co.uk](http://www.aboutmyvote.co.uk)

**Putting voters first**

 Please consider the environment before printing this email.

**From:** Antonia Flockton [REDACTED]  
**Sent:** 23 February 2017 16:57  
**To:** [REDACTED]  
**Cc:** [REDACTED] Alan Halsall  
**Subject:** Fwd: line on investigation

Dear [REDACTED]

If we receive questions from the press regarding the investigation we plan to respond as below. Could you confirm if this is in line with your understanding as to the matter under investigation.

It would be greatly appreciated.

Kind regards,

Antonia

Antonia Flockton

Vote Leave

[Redacted]

----- Forwarded message -----

From: [Redacted]  
Date: Thu, Feb 23, 2017 at 4:49 PM  
Subject: line on investigation  
To: Antonia Flockton [Redacted]

'We gave in a return on 23 December and we realised that we had submitted the return with excess spending that did not need to be reported it was therefore amended - we were also missing a handful of invoices from suppliers these have since been provided.'

--

[Redacted]

Partner, Hanbury Strategy

Communications | Strategy | Insight | Campaigns

E: [Redacted]

M: [Redacted]

68-80 Hanbury Street, London, E1 5JL

Website: [www.hanburystategy.com](http://www.hanburystategy.com)

Twitter: 

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[REDACTED]

----- Original Message -----

**From:** Vote Leave Limited

**Received:** 11/07/2017 13:06

**To:** [REDACTED]

**Subject:** Re: Release of documents exchanged between Vote Leave and the Electoral Commission CCM:0058665

This account has now been closed. If you have any urgent queries please send them to:

[REDACTED]

Many thanks.

--

**Vote Leave**

7th Floor, Westminster Tower

3 Albert Embankment

SE1 7SP

[www.voteleavetakecontrol.org](http://www.voteleavetakecontrol.org)