**Harriet Fielding**

**From:** FOI
**Sent:** 05 July 2016 11:54
**To:** [redacted]
**Subject:** FOI 69/16 - EU citizens polling cards [Part 1]
**Attachments:** 1_Emails for release.pdf; 2_Electoral Commission statement on EU citizens redacted.pdf; 3_EU citizens receiving poll cards redacted.pdf; 4_Survey regarding EU citizens incorrectly sent poll cards and or postal votes redacted.pdf; 5_FOI 65 - WatsonJ-to-DuncanSmithI-JenkinB-EU-nationals-EU-Ref-2016-06-0.pdf; 6 _Midlands_EU Voters receiving Poll Card.xlsx

Dear [redacted]

**Our Ref: FOI 69/16**

Thank you for your request under the Freedom of Information Act 2000 dated 6 June 2016.

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.

You have requested:

**The media have revealed that so far several thousand polling cards have been issued to EU citizens from other EU countries (excluding Ireland)**
**who are not entitled to vote.**

**Kindly supply details of ;**

**1) all communications between the Commission, the Cabinet Office and referendum returning officers throughout the land. This**
**is to include emails and telephone call transcripts.**

**2) what steps are you taking to both rectify and stop this practice BEFORE 23rd June.**
**Will this be done on a sampling i.e. statistical basis or will you require full audits of the use of electoral registers across the land.**

**3) provide an explanation as to how this occurred and why system checks were not in place to stop it.**

**4) provide details of those areas considered by the Commission to be most at risk from electoral fraud.**
**Has the evidence of crucial mistakes by some returning officers increased the areas at risk**

**5) in one area guidance for voting was issued that indicated one should vote to remain. What steps have you taken to**
**a) rectify this**
**b) ensure that the practice is not being conducted elsewhere.**

**6) copies of correspondence with all foreign bodies unable to register as participants in the referendum who you believe to be taking part**

**7) details of the sanctions open to you against those bodies in 6 above who you believe to spend more than £10k.**

Our response is as follows:

[Note: This response will be sent in two parts, as explained under **(6)** and **(7)**]

The Commission does hold some information relevant to your request.

**1) all communications between the Commission, the Cabinet Office and referendum returning officers throughout the land. This is to include emails and telephone call transcripts.**

We have understood your request as being for all communications relating to poll cards for the referendum being issued to EU citizens who are not entitled to vote. While your request specifically mentions Returning Officers, we have read this as Counting Officers, who were responsible for the conduct of the referendum in each local voting area.

The Commission has issued two statements on this issue, outlining the actions taken to address the issue and to confirm the numbers of individuals affected. The statements can be accessed on our website at http://www.electoralcommission.org.uk/i-am-a/journalist/electoral-commission-media-centre/news-releases-referendums/electoral-commission-statement-on-non-eligible-eu-citizen-voters and http://www.electoralcommission.org.uk/i-am-a/journalist/electoral-commission-media-centre/news-releases-referendums/electoral-commission-update-on-non-eligible-eu-citizen-voters

In addition, in order to promote transparency and confidence in the administration of the referendum, the Chief Counting Officer published a log to capture issues that, in her opinion, could have had a widespread or significant impact on the delivery of the referendum or have affected confidence in the result. This issue was recorded in this log, which can be found at: http://www.electoralcommission.org.uk/find-information-by-subject/elections-and-referendums/upcoming-elections-and-referendums/eu-referendum.

We have also attached copies of communications between the Commission and Counting Officers relating to poll cards for the referendum being issued to EU citizens who are not entitled to vote.

We do not hold any information on communications between the Commission and the Cabinet Office in relation to poll cards for the referendum being issued to EU citizens who are not entitled to vote. We do, however, have a copy of correspondence between Jenny Watson, Chair of the Electoral Commission, and Ian Duncan Smith MP and Bernard Jenkin MP, which relates to this issue and which is attached to this response for your information

**2) what steps are you taking to both rectify and stop this practice BEFORE 23rd June. Will this be done on a sampling i.e. statistical basis or will you require full audits of the use of electoral registers across the land.**

The statements issued by the Commission and linked to above set out the actions which were taken to address the issue and confirms the numbers of individuals who were affected.

**3) provide an explanation as to how this occurred and why system checks were not in place to stop it.**

As set out in the statements issued by the Commission and linked to above, poll cards for the referendum were issued to a small number of EU citizens as a result of an issue with elections software used by a number of local authorities in England and Wales.

The Commission is not responsible for the maintenance of electoral registers or the production or issuing of poll cards. Electoral Registration Officers are responsible for electoral registers in their local authority area. Counting Officers were responsible for the conduct of the poll in their local voting area, including the production and issuing of poll cards. Electoral Registration Officers and Counting Officers generally use electoral management software systems to help with the practical delivery of their functions, such as the production and issuing of poll cards.

**4) provide details of those areas considered by the Commission to be most at risk from electoral fraud.**
**Has the evidence of crucial mistakes by some returning officers increased the areas at risk**

Electoral Registration Officers, Returning Officers / Counting Officers are responsible for planning and managing the delivery of electoral fraud prevention plans, working closely with police forces to assess and monitor electoral fraud risks in the areas for which they are responsible. We provide guidance and set performance standards which aim to ensure that Electoral Registration Officers and Returning Officers / Counting Officers have thoroughly analysed the risk of electoral fraud locally and that their plans represent an effective response to tackle those risks.

We focus our support and monitoring work in areas where there has been a history of allegations of electoral fraud and where the risk of further allegations arising is higher. These areas currently include: Birmingham; Blackburn with Darwen; Bradford; Bristol; Burnley; Calderdale; Coventry; Derby; Hyndburn; Kirklees; Luton; Oldham; Pendle; Peterborough; Slough; Tower Hamlets; Walsall; Woking.

Police forces, Electoral Registration Officers and Returning Officers / Counting Officers in these areas have significant experience of preventing and detecting electoral fraud, and they work harder to minimise the risk of allegations arising.

Our ongoing monitoring of the delivery of the referendum was intended to enable us to identify specific issues which we could then follow up directly with the relevant Counting Officer for the voting area in question.

**5) in one area guidance for voting was issued that indicated one should vote to remain. What steps have you taken to**
**a) rectify this**
**b) ensure that the practice is not being conducted elsewhere.**

The Commission was made aware of two Counting Officers who had issued pictorial postal voting instructions with the first despatch of postal vote packs that could be interpreted as favouring one particular outcome in the referendum. The issue affected approximately 61,000 postal voters across Bristol and Swale.

Following advice from the Chief Counting Officer, who is responsible for the overall conduct of the referendum and ensuring the accuracy of the overall result, the Counting Officers arranged for an amended version of the postal voting instructions to be used for all additional postal voting packs being sent out. The Chief Counting Officer also issued guidance to all Counting Officers to ensure that any postal voting instructions which used either the same image, or a similar image, were changed before any further postal votes were distributed. Links to this guidance are included below.

http://www.electoralcommission.org.uk/__data/assets/pdf_file/0004/206518/Electoral-Administration-Bulletin-154.pdf

http://www.electoralcommission.org.uk/__data/assets/pdf_file/0003/206526/Electoral-Administration-Bulletin-140S.pdf

This issue was also covered in the Chief Counting Officer's log referred to above and the Commission also issued a statement relating to this issue, which can be found at: http://www.electoralcommission.org.uk/i-am-a/journalist/electoral-commission-media-centre/news-releases-referendums/electoral-commission-statement-on-postal-voting-instructions

**6) copies of correspondence with all foreign bodies unable to register as participants in the referendum who you believe to be taking part**
**7) details of the sanctions open to you against those bodies in 6 above who you believe to spend more than £10k.**

Unfortunately we will not be able to provide you with the copies of correspondence today due to a delay in our internal processes. We will endeavour to provide the requested correspondence to you as soon as possible and by the Wednesday 6 July at the latest. Furthermore, we will also include our response to **(7)** with the follow-up response as the two questions are interlinked.

Section 40(2) and (3)(a)(i) of the FOI Act

In the information we are releasing, we have redacted some of the information in the documents. Section 40(2) provides for an exemption where the information requested constitutes personal data as defined by the Data Protection Act 2000 (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.

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: 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: http://www.ico.gov.uk

Yours sincerely

**Paul O'Malley**
**Information Adviser (Records Management)**
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
Tel: 020 7271 0554
Fax: 020 7271 0665
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

**Putting voters first**

 Please consider the environment before printing this email.

**Query 1**

Afternoon [redacted].

[redacted] my RO/ERO) and I thought we should forward this e-mail to you for information…as to us it seems to have been drafted by an organisation and then forwarded onto activists to send through to their local Authority. I have seen the circulars yesterday and today from the EC, but was wondering if you had further advice before we reply to the elector, especially as it seems they are questioning the integrity of the Poll, not just here in [redacted], but across the UK…

Likely, we did not have any problems with the G Markers here in [redacted] but there is certainly no way we could between now and Polling Day go through our whole register to check every nationality of all non-G markers, and how would we unless we request everyone to bring in their passport to prove that they are British etc…

Regards,

[redacted]

Head of Electoral Services

**Response 1**

Hello [redacted]

Thank you for your query below.

In responding I assume you will refer to the statements on our website about this matter, which stems primarily from a software issue and is not indicative of a wider concern that there are numbers of people on electoral registers with the wrong nationality recorded against them. I would advise explaining the processes you already adhere to when determining applications to register and the grounds upon which you would request evidence of nationality in line with the ERO's power to do so. I would reiterate the provisions in law requiring individuals to give true information when applying to register and the possible ramifications for anyone who gives false information.

I hope this is helpful.

Best wishes

[redacted]

**Query 2**

I understand that the Electoral Commission are already aware of a problem with the Xpress software system and how some EU voters have received poll cards/postal votes in error because the system didn't log against a G marker against their name when their application was processed. From the software update just provided by Xpress, we are one of the councils affected.

This has affected 208 of our EU voters, 8 of which are postal voters and already sent a postal vote pack.

The actions we are taking are:

- The 8 postal votes have been cancelled on the system

- All 208 voters will receive a letter of explanation with an apology going out 1st class today

I have been discussing with our CO and Communications Team whether we should issue a news release highlighting the issue and we would appreciate your advice on how we should manage this.

[redacted]

**Response 2**

It would be for the CO to decide whether they issue a local press release/publicity around this since they will be aware of the particular issues locally and aware of what interest there is in this.

[redacted]

**Query 3**

[redacted] enquired as to which local COs were affected by the EU poll card issue.

**Response 3**
Provided info as to those affected from survey returns.

**Query 4**

Hi
I have returned mine – we had 8 sadly – but I am being asked locally how we compare with others – will this information be made available please?

PS does 8 look good or bad????

**From:** Xpress Support [mailto:support@xssl.co.uk]
**Sent:** 02 June 2016 16:36

**Cc:** [redacted]
**Subject:** FW: Survey regarding EU citizens incorrectly sent poll cards and or postal votes - COMPLETE BY 12 NOON ON 3 June 2016 (Case 121645)
**Importance:** High

Dear Xpress User,

In Relation to the Xpress Mail and subsequent release yesterday evening, the Electoral Commission has prepared a short survey and asked us to send you this email to capture the number of EU citizens who received a poll card and/or postal vote for the EU referendum in error.

It is important for the Commission to able to quantify the extent of the issue and measure its impact. To enable the Commission to do this, please complete this short survey **by 12 p.m. tomorrow (3 June 2016)**. You should still complete it even if no electors at your authority were affected.

To calculate the number of electors please run the following export:

Register | Exports | Elector | European Electors who did not have G Marker

And check the total number of rows in Excel. If you receive a message of 'no data selected' then please respond to the survey with Zero.

Thanks

Xpress Software Solutions Limited

303 Sperry Way, Stonehouse Business Park, Stonehouse GL10 3UT
T: 01453 794999
F: 01453 827293

Visit our new website at: www.xssl.co.uk

**Response 4**

Hi [redacted]

I understand that we plan to publish an indication of numbers tomorrow, but it won't name individual authorities. I have seen a report from one other authority with a much higher number than yours; I'd say your figure's at the lower end of the scale however I don't have access as yet to much in the way of detail on this. I hope though that this gives you some reassurance.

Best wishes

[redacted]

[redacted] The Electoral Commission

**Query 5**

From: [redacted]
Sent: 03 June 2016 15:30
To: [redacted] infoengland
Cc: [redacted]
Subject: Xpress - EU elector error
**From:** [redacted]
**Sent:** 03 June 2016 15:30
**To:** [redacted] infoengland
**Cc:** [redacted]
**Subject:** Xpress - EU elector error

Hello

I just wanted to update you that we have now concluded the investigation with Xpress of why we had 208 EU voters not recorded in our system with a G marker.

Our issue is the not the same as others have experienced through the inputting of the nationality – it relates to the conversion of our system between IDOX and Xpress in December. It is the EU electors who were pending at the time of the conversion who have been affected.

Our issue is the not the same as others have experienced through the inputting of the nationality – it relates to the conversion of our system between IDOX and Xpress in December. It is the EU electors who were pending at the time of the conversion who have been affected.

All affected electors have been notified of the issue with the explanation that they are unable to vote at this referendum based on the legislation. I have agreed with the CO that we will deal with issues raised on a case by case basis. We will use the messages in the Commission's letter to support this.

If you need any further information, just let me know and [redacted] can explain the specifics.

Best wishes
[redacted]

**Response 5**

Noted and logged

**Query 6**

**From:** [redacted]
**Sent:** 07 June 2016 14:25

**To:** [redacted]
**Cc:** [redacted] info_inbox
**Subject:** URGENT Concern Over Your Electoral Register
**Importance:** High

Dear Sirs,
Last week I attended a husting event in [redacted] where I raised an issue to the panel regarding one of my work colleagues who resides in your borough, that are not British Citizens, but have been sent their voting cards for the forthcoming EU Referendum. [redacted] for [redacted] who was on the panel, suggested that I contact you directly and raise my concern. I have also contacted the electoral commission last week and have copied them in on this communication. My colleague name is [redacted] who is a French Citizen. She also mentioned to me that all her flat mates who are not British Citizens, also have their voting cards. Can you please investigate this as a matter of urgency and advise all parties on this communication of how this error has occurred and what measures will be taken to ensure that the June 23rd vote is legitimate and fair and not spoilt.

Kindest Regards

[redacted]

**Response 6**

Hello [redacted]

This enquiry was copied to us so you are obviously aware of it. Could you copy us into any reply please for our records (I'm assuming these are people affected by the software issue).

Best wishes

[redacted]

**Query 7**
Email from [redacted]
"Hi chaps I need some advice.

I have about 80 of these electors according to the file eXpress have sent me. With one of the highest European Electorates in the UK it could have been much worse.

But what I am not prepared to do is sign a pre-printed letter that says "Due to an administrative error. "

Because it isn't. We will have to do it ourselves because I doubt eXpress will re-run it.

This is a situation absolutely not of our making.

I am not a happy bunny – what I would like to ask you is an alternative suitable phrase, which may also head off complaints to yourselves further down the line."

**Response 7**

Reply:

"Just to say that we haven't seen the letter so I couldn't comment on what it says. It's not something we drafted or signed off so we wouldn't expect you to say that something that you weren't happy with. If you could forward a copy I'd be grateful. "

**Query 8**

[redacted] forwarded a message from Xpress:

"Issue: We have identified an issue based on reports by customers that some electors on their register have the 'G' marker missing where it should be applied. This has been caused when processing HEF's in the HEF queue by typing nationalities in full, rather than selecting them from the available drop down list.

Fix: We are able to identify all of these electors (if you have any) and are currently working on an update that will correct them. The update will apply the correct marker, cancel any absent votes and include a letter for you to write to the individuals concerned. If any absent votes are cancelled, should they be returned, the scanning program will report that the absent vote has been cancelled and not accept it. Polling Station Registers will be marked accordingly.

The release will be available before 6pm this evening.

The Electoral Commission are aware of the issue and remedy."

**Response 8**

Alerted EA staff who were aware of issue and preparing lines to take.

**Query 9**

I understand that the Electoral Commission are already aware of a problem with the Xpress software system and how some EU voters have received poll cards/postal votes in error because the system didn't log against a G marker against their name when their application was processed. From the software update just provided by Xpress, we are one of the councils affected.

This has affected 208 of our EU voters, 8 of which are postal voters and already sent a postal vote pack.

The actions we are taking are:

- The 8 postal votes have been cancelled on the system
- All 208 voters will receive a letter of explanation with an apology going out 1st class today

I have been discussing with our CO and Communications Team whether we should issue a news release highlighting the issue and we would appreciate your advice on how we should manage this.

**Response 9**

It would be for the CO to decide whether they issue a local press release/publicity around this since they will be aware of the particular issues locally and aware of what interest there is in this.

Regards,

[redacted]

**Query 10**

Afternoon [redacted].

[redacted] (my RO/ERO) and I thought we should forward this e-mail to you for information…as to us it seems to have been drafted by an organisation and then forwarded onto activists to send through to their local Authority. I have seen the circulars yesterday and today from the EC, but was wondering if you had further advice before we reply to the elector, especially as it seems they are questioning the integrity of the Poll, not just here in [redacted] but across the UK…

Likely, we did not have any problems with the G Markers here in [redacted] but there is certainly no way we could between now and Polling Day go through our whole register to check every nationality of all non-G markers, and how would we unless we request everyone to bring in their passport to prove that they are British etc…

Regards,

[redacted]

Head of Electoral Services

**Response 10**

Hello [redacted]

Thank you for your query below.

In responding I assume you will refer to the statements on our website about this matter, which stems primarily from a software issue and is not indicative of a wider concern that there are numbers of people on electoral registers with the wrong nationality recorded against them. I would advise explaining the processes you already adhere to when determining applications to register and the grounds upon which you would request evidence of nationality in line with the ERO's power to do so. I would reiterate the provisions in law requiring individuals to give true information when applying to register and the possible ramifications for anyone who gives false information.

I hope this is helpful.

**Query 11**

Email:

"You will have received a number of reports from across the country, as a result of your survey.

Most of these will have very small numbers. The [redacted] response has a significant number – 493 as at 2 June, with 67 postal votes.

The reason for having a large number of EU citizens in [redacted] showing as having no G marker is due to the functionality on our [redacted] The field in the [redacted] which has the nationality is imported into Xpress, with the result that the drop down option cannot be selected.

This problem has been identified, and shared with Xpress.

Our preference is that there is a fix which can be developed by Xpress and our own IT department, so that we can continue to use our [redacted] process. We are convinced that the way forward for registration is to offer the functionality for registration on multiple occasions, to provide the resident with every opportunity to register to vote.

However this is not a straightforward process, due to the multiple applications in use and the need to link these with the registration application.

We will continue to liaise with Xpress on how the issue can be resolved. Please contact me if you need any further information."

Further email sent asking for EC actions around this issue.

**Response 11**

Reply:

"Thank you for your email and further update. In terms of how we are presenting the data and our approach, the best I can do is to refer you to the Media Statement we issued earlier this afternoon (see below). We are not planning on making any data available other than overall numbers so you should be able to tie in any local press enquiries with the statement we have made.

I hope that's helpful but please let me know if you have any questions."

**Query 12**

If they have registered as eg Italian, and are on the register with a G marker, if they turn up here on 23rd June with proof that they have dual nationality what do we do?

**Response 12**

They need to make a new application to change their franchise so it is too late.

[redacted]

[redacted]

**From:** [redacted]
**Sent:** 03 June 2016 11:41
**To:** [redacted]@falkirk.gov.uk'; [redacted]@eoni.org.uk'; [redacted]@manchester.gov.uk'; [redacted]@kettering.gov.uk'; [redacted]@birmingham.gov.uk'; [redacted]@poole.gov.uk'; [redacted]@lewisham.gov.uk'; [redacted]@southampton.gov.uk'; [redacted]@leeds.gov.uk'; [redacted]@chelmsford.gov.uk'; [redacted]@flintshire.gov.uk'; [redacted]@sunderland.gov.uk'
**Cc:** [redacted]
**Subject:** Electoral Commission statement on EU citizens

Dear Colleagues,

Please see the below media statement issued last night about the issue of non-eligible EU citizens receiving poll cards for the referendum.

Regards,

[redacted]

The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ
Tel: [redacted]
Fax: [redacted]
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

**Putting voters first**

Please consider the environment before printing this email.

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# Media Statement

## 2 June 2016 – for immediate release

# Electoral Commission statement on EU citizens

The Electoral Commission became aware late ye sterday afternoon (1 June 2016) that there had been an issue with elections software used by a num ber of local authorities in England and Wales that meant a small number of non-eligible EU citizens had mi stakenly receiv ed poll car ds and, in some instances, postal votes.

We have written to Iain Duncan Smith and Bernar d Jenkin addressing a num ber of iss ues raised around non-eligible EU citizens in a letter sent to the Commission today, which is available here.

**An Electoral Commission spokesperson said:**

"We are aware that a small number of non-eligible EU citizens had mistakenly received poll cards and, in some instances, postal votes for the EU Referendum. We are working to confirm the exact number of electors who have been affected by an issue with elections software and will be able to confirm numbers tomorrow afternoon.

"The software provider has resolved the iss ue which means that, if any postal votes have been issued to t hese electors, they will be cance lled and none of these electors will be shown as eligible on the electoral register s to be used at polling stations on 23 June. All of the affected electors will also be written to by their local Electoral Regist ration Officer with an ex planation of what happened and will be told that they will not be able to vote at the referendum.

"If anyone has evidence that so meone who is ineligible to vote at the EU Referendum has received a poll card, they should forward the evidence to us at info@electoralcommission.org.uk. We are following up indivi dual claims with the relevant Electo ral Registration Officers to ensur e that only those who are eligible are able to vote at the referendum."

**Ends**

For further information contact Electoral Commission press office on 020 7271 0704 or press@electoralcommission.org.uk Out of office hours 07789 920 414

**Notes to editors**

1. The Electoral Commission is an independent body set up by the UK Parliament. Our aim is integrity and public confidence in the UK's democratic process. We regulate party and election finance and set standards for well-run elections and are responsible for the conduct and regulation of referendum held under the Political Parties, Elections and Referendums Act (2000).

[redacted]

**Subject:** FW: EU citizens receiving poll cards

**From:** [redacted]
**Sent:** 01 June 2016 17:50
**To:** RCO Kettering
**Cc:** [redacted]
**Subject:** RE: EU citizens receiving poll cards

Hi All

Further to the email below.

It appears that the issue is a software issue and it is affecting all Xpress customers. Xpress dialled in to have a look at our issue but we had already put ours right so they checked others customers instead.

Please see alert below from Xpress

Hi [redacted]

We have worked this out now.

We will release a notification to all clients shortly.

Thanks for your help

[redacted]

# European Electors without a 'G' Marker

**Issue:** We have identified an issue based on reports by customers that some electors on their register have the 'G' marker missing where it should be applied. This has been caused when processing HEF's in the HEF queue by typing nationalities in full, rather than selecting them from the available drop down list.

**Fix:** We are able to identify all of these electors (if you have any) and are currently working on an update that will correct them. The update will apply the correct marker, cancel any absent votes and include a letter for you to write to the individuals concerned. If any absent votes are cancelled, should they be returned, the scanning program will report that the absent vote has been cancelled and not accept it. Polling Station Registers will be marked accordingly.

The release will be available before 6pm this evening.

The Electoral Commission are aware of the issue and remedy.

Kind regards, Support Team.

Regards

[redacted]

[redacted]

Electoral Services I Nottingham City Council I Station Street I Nottingham I NG2 3NG
[redacted] I w: www.nottinghamcity.gov.uk

**click below to register to vote**




---

**From:** [redacted]
**Sent:** 01 June 2016 13:56
**To:** 'RCO Kettering'
**Cc:** [redacted]
**Subject:** EU citizens receiving poll cards
**Importance:** High

Hi [redacted]

Further to our conversation today regarding the 28 EU citizens in Nottingham City who have been sent a polling card in error, please find attached the following:-

- A briefing note - EU citizens with poll card
- A copy of the letter sent to all affected electors
- A note of the conversation with a 'concerned elector'
- An email from UKIP Referendum agent

As discussed I have also sent an email to Xpress asking them whether this is an issue with Nottingham City only or whether any other Xpress users in the region may be affected.

As soon as I have an answer from Xpress I will let you know.

If you need any further information from me in the meantime please do not hesitate to get in touch.

Regards

[redacted]
**Electoral Services Manager**

Electoral Services I Nottingham City Council I Station Street I Nottingham I NG2 3NG
[redacted] I w: www.nottinghamcity.gov.uk

**click below to register to vote**




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Nottingham City Council unless specifically stated.

If you have received it in error, please delete it from your system, do not use, copy or disclose the information in any way nor act in

reliance on it and notify the sender immediately.

Please note that Nottingham City Council monitors e-mails sent or received for the purposes of ensuring compliance with

its policies and procedures.

Further communication will signify your consent to this.

The contents of e-mails sent or received may have to be disclosed if a relevant request is made under current legislation, such as,

but not limited to, the Data Protection Act 1998 and the Freedom of Information Act 2000.

This e-mail message has been scanned for Viruses and Content
and cleared by Sophos

[redacted]

**From:** Xpress Support <support@xssl.co.uk>
**Sent:** 02 June 2016 16:36
**Cc:** [redacted]
**Subject:** FW: Survey regarding EU citizens incorrectly sent poll cards and or postal votes - COMPLETE BY 12 NOON ON 3 June 2016 (Case 121645)

**Importance:** High

**Categories:** Transferred to SharePoint

Dear Xpress User,

In Relation to the Xpress Mail and subsequent release yesterday evening, the Electoral Commission has prepared a short survey and asked us to send you this email to capture the number of EU citizens who received a poll card and/or postal vote for the EU referendum in error.

It is important for the Commission to able to quantify the extent of the issue and measure its impact. To enable the Commission to do this, please complete this short survey **by 12 p.m. tomorrow (3 June 2016)**. You should still complete it even if no electors at your authority were affected.

To calculate the number of electors please run the following export:

Register | Exports | Elector | European Electors who did not have G Marker

And check the total number of rows in Excel. If you receive a message of 'no data selected' then please respond to the survey with Zero.

Thanks

Xpress Software Solutions Limited

303 Sperry Way, Stonehouse Business Park, Stonehouse GL10 3UT
T: 01453 794999
F: 01453 827293

Visit our new website at: www.xssl.co.uk

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Email disclaimer: www.xssl.co.uk/disclaimer.htm

The Electoral Commission

**Rt. Hon. Iain Duncan Smith MP**
**House of Commons**
**London**
**SW1A 0AA**

**Bernard Jenkin MP**
**House of Commons**
**London**
**SW1A 0AA**

2 June 2016

Dear Mr Duncan Smith, Mr Jenkin,

Thank you for your letter. As Chief Counting Officer my priority is making sure that the referendum is well-run and I am working closely with the 11 Regional Counting Officers and 382 Counting Officers responsible for delivering the poll to ensure this happens. Any issues raised with us by campaigners or the public are taken seriously and being looked into.

It is important for everyone to understand what evidence there is of a reported problem and what is being done to address it before conclusions are reached about its extent.

**Receipt of poll cards and postal votes**

You will have seen the reports of the issue with the Polish elector at the London Borough of Kingston-upon-Thames who received a poll card for the referendum. This is because they stated on their application for registration that they were British even though they were Polish. This has now been dealt with by the Electoral Registration Officer (ERO) who has changed their nationality status to Polish and marked them on the register as ineligible to vote at the referendum. The issue is being referred to the police by the ERO who will be able to consider if a crime has been committed.

We also became aware late yesterday afternoon that there has been an issue with elections software used by a number of local authorities in England and Wales that has meant that a small number of EU citizens have mistakenly received poll cards and, in some instances, postal votes. We are working to confirm the exact number of electors who have been affected and will be able to confirm numbers tomorrow afternoon. The



The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

Tel: 020 7271 0500
Fax: 020 7271 0505
info@electoralcommission.org.uk
www.electoralcommission.org.uk

software provider has resolved the issue which means that, if any postal votes have been issued to these electors, they will be cancelled and none of these electors will be shown as eligible on the electoral registers to be used at polling stations on 23 June. All of the affected electors will also be written to with an explanation of what happened and will be told that they will not be able to vote at the referendum.

We have said that if anyone has evidence that someone who is ineligible to vote at the EU Referendum has received a poll card, they should forward the evidence to us at info@electoralcommission.org.uk. We are following up individual claims with the relevant Electoral Registration Officers to ensure that only those who are eligible are able to vote at the referendum.

**Electoral registration**

The electoral registration process being followed for the EU referendum is the same as the one for all other electoral events in the UK.

Providing false information on a registration application is a serious offence and this is made clear as part of the application process. Anyone who knowingly provides false information on an application faces six months imprisonment and/or an unlimited fine in England and Wales or a fine not exceeding £5,000 in Scotland. The police are responsible for investigating any instances of electoral fraud, so if anyone has evidence that an offence has been committed, they should contact the police immediately using the **101** non-emergency number. If they do not want to give a statement to the police, they can report their concerns anonymously on the Crimestoppers website or by calling Crimestoppers on **0800 555 111**.

The Commission has worked with the National Police Chiefs' Council to produce a protocol for the Commission, Electoral Registration Officers and Counting Officers on reporting allegations of electoral fraud at the referendum to the police and how information about allegations will be shared. If an Electoral Registration Officer or Counting Officer concludes that it is possible that an offence may have been committed, the protocol sets out that they will provide all necessary information (i.e. details of the complainant and any evidence about the complaint) to the relevant police force immediately after receiving the allegation. Where information is provided to us and we conclude from the evidence provided that it is possible that an offence may have been

committed, we will contact the relevant Electoral Registration Officer or Counting Officer immediately to agree how to provide the necessary information (i.e. details of the complainant and any evidence about the complaint) to the relevant police force.

As part of the registration application process, applicants are required to give their nationality. As you will be aware, Parliament decided that those who are entitled to vote in UK Parliamentary general elections, as well as Peers and citizens of Gibraltar are entitled to vote in this referendum. This means that EU citizens – unless they are British, Irish or citizens of Cyprus or Malta – are unable to vote at the referendum. Where an EU citizen holds dual nationality, they will be able to vote at the referendum if they also hold a nationality that would make them eligible to vote.

Before adding a person to the electoral register an Electoral Registration Officer must determine whether the applicant is eligible to be included on the electoral register. If the Electoral Registration Officer has any concerns in relation to a person's nationality, they have the power to require them to supply documentary evidence, such as a birth certificate or a certificate of naturalisation. If there are any doubts as to whether an applicant or registered elector is legally resident in the UK, the Electoral Registration Officer can request checks of a person's immigration status against Home Office records.

Once the Electoral Registration Officer is satisfied that a person meets the registration requirements, including in relation to nationality, the applicant's details will be included in the electoral register. If the Electoral Registration Officer determines that the elector is eligible to vote only at certain elections – for example, if they are an EU citizen – they will add the relevant franchise marker to the register to indicate this. This marker ensures that they will not be issued with a ballot paper at the referendum unless they are eligible to receive one.

Any elector may object to an entry in the electoral register if they believe that that person does not meet all of the requirements for registration. Electoral Registration Officers have a duty to ensure that, as far as is reasonably practicable, people who are not entitled to be registered are not registered and to enable them to do this, they can carry out a review of a person's entitlement to remain registered at any time. If, on completion of the review the Electoral Registration Officer determines that a person is

not entitled to remain registered, they will remove their details from the electoral register.

Given the public interest in this issue I am also placing this letter on the Electoral Commission's website.

Yours sincerely



**Jenny Watson**
**Chair**

The Electoral Commission

| Voting Area | Express User | Voters Afected |
|---|---|---|
| Amber Valley Borough Council | No | |
| Erewash Borough Council | No | |
| Bolsover District Council | Yes | 5 |
| Chesterfield Borough Council | Yes | 9 |
| North East Derbyshire District Council | Yes | 0 |
| High Peak Borough Council | Yes | 1 |
| Derbyshire Dales District Council | No | |
| Derby City Council | Yes | 36 |
| South Derbyshire District Council | Yes | 2 |
| Blaby District Council | Yes | 0 |
| Charnwood Borough Council | Yes | 6 |
| Harborough District Council | Yes | 4 |
| Hinckley and Bosworth Borough Council | Yes | 0 |
| Leicester City Council | Yes | 24 |
| Melton Borough Council | No | |
| North West Leicestershire District Council | Yes | 0 |
| Oadby and Wigston Borough Council | Yes | 11 |
| Rutland County Council | No | |
| Boston Borough Council | Yes | 1 |
| East Lindsey District Council | Yes | 0 |
| Lincoln City Council | No | |
| North Kesteven District Council | Yes | 3 |
| South Holland District Council | Yes | 1 |
| South Kesteven District Council | Yes | 2 |
| West Lindsey District Council | Yes | 0 |
| Corby Borough Council | Yes | 4 |
| Daventry District Council | Yes | 2 |
| East Northamptonshire District Council | Yes | 1 |
| Kettering Borough Council | Yes | 1 |
| Northampton Borough Council | Yes | 9 |
| South Northants Council | Yes | 0 |
| Wellingborough Borough Council | Yes | 1 |
| Ashfield District Council | Yes | 3 |
| Bassetlaw District Council | Yes | 1 |
| Broxtowe Borough Council | No | |
| Gedling Borough Council | Yes | 2 |
| Mansfield District Council | No | |
| Newark and Sherwood District Council | No | |
| Nottingham City Council | Yes | 28 |
| Rushcliffe Borough Council | Yes | 0 |

Total 157

3,375, 604

| Comments |
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## Harriet Fielding

**From:** FOI
**Sent:** 08 July 2016 14:24
**To:** [redacted]
**Subject:** FOI 69/16 - EU Citizens polling cards [Part 2]
**Attachments:** FW: RE: EFFD leaflets CCM:0287059; 1.1 Email exchange with Europe of Freedom and Direct Democracy.pdf; FW: Re: referendum CCM:0287061; 1.2 Email exchange with Europe of Freedom and Direct Democracy.pdf; FW: Re S&D; 1.3 Email exchange with Europe for Freedom and Democracy.pdf; 2 French Socialist Party email exchange.pdf; RE: New contact form submission; 3.1 Electoral Commission-Embassy of Hungary.pdf; 3.2 Embassy of Hungary-EC.pdf; 4.1 Letter BP to IMF 27052016.pdf; 4.2 IMF to B Posner.pdf; RE: Electoral Commission overseas voters campaign CCM:0274634; 5 Brussels and Europe Liberal Democrats.pdf; 6 Ryanair press release.docx; 6 Ryanair press release.pdf; 7.1 Email to OECD.pdf; FW: OECD spending for the referendum on the UKs membership of the European Union CCM:0287052; 7.2 Email to OECD.pdf; FW: Rules in relation to the United Kingdom's referendum on membership of the European Union CCM:0287053; 7.3 Bob Posner to OECD.pdf; 7.4 Email to OECD.pdf; FW: The Referendum on the UK membership of the European Union CCM:0287054; FW: RE: Rules on the Uk's referendum on the European Union CCM:0273015; 7.5 OECD Email exchange with OECD.pdf; 7.5.1 logged correspondence OECD.docx; 7.5.1 logged correspondence OECD.pdf

Dear [redacted]

**Our Ref: FOI 69/16**

Thank you for your request under the Freedom of Information Act 2000 dated 6 June 2016.

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

We sent a response to you on the 4 July but advised we were unable to respond fully at the time to question 6 (as seen below): copies of correspondence with all foreign bodies unable to register as participants in the referendum who you believe to be taking part. This was due to a delay in our internal processes. We are now able to provide you with a response.

Your request is in bold below followed by our response.

You have requested:

**The media have revealed that so far several thousand polling cards have been issued to EU citizens from other EU countries (excluding Ireland)**
**who are not entitled to vote.**

**Kindly supply details of ;**

**6) copies of correspondence with all foreign bodies unable to register as participants in the referendum who you believe to be taking part**

The Commission does hold information related to your request.

Part of the information we hold that you requested has previously been released in a freedom of information request on the 12 May. The requested information at the time included:

**What steps is the Commission taking to ensure groups within the European Parliament are aware that non-UK funds may not be spent on referendum information?**

**Has the Commission been in touch with these groups to explain that non UK funds may not be spent on referendum information in the relevant period. As such expenditure is allowed under EP rules they may not be aware of the restrictions imposed under PPERA.**

You can find the response here:
http://www.electoralcommission.org.uk/__data/assets/pdf_file/0005/212558/FOI-32-16-redacted-response-for-web.pdf

We also hold additional correspondence with organisations that did not meet the requirements for registration as a referendum campaigner. This information we have attached. This includes correspondence with the following organisations:

- Europe of Freedom and Direct Democracy
- French Socialist Party
- Embassy of Hungary
- International Monetary Fund
- Brussels and Europe Liberal Democrats
- Organisation for Economic Co-operation and Development
- Socialists and Democrats in the European Parliament
- World Economic Forum

Additionally we hold information on the company Ryanair. We released the findings of an assessment in a press release here: http://www.electoralcommission.org.uk/i-am-a/journalist/electoral-commission-media-centre/news-releases-donations/electoral-commission-statement-on-assessment-of-ryanair-spending-on-eu-referendum-campaigning?. The information we hold relates to a regulatory assessment conducted by the Commission. We consider this information exempt under section 30 and section 31.Section 30(1) (a) (i) and 31 (1) (g)

The Commission has a statutory function to conduct investigations into potential breaches of the reporting requirements in Political Parties, Elections and Referendums Act 2000 ("PPERA"). The information requested is held by the Commission in relation to an investigation into whether Ryanair committed an offence in relation to referendum campaigning spending in the EU Referendum.

As stated in our press release, our regulatory assessment considered whether Ryanair committed an offence under section 117 of PPERA. Section 117 sets out offences relating to unregistered referendum campaigners spending more than £10,000 on referendum campaigns in the referendum period.

Section 30(1) (a) (i) of the Freedom of Information Act 2000 (FOI) provides for exemption from disclosure of information 0077hich has been held at any time by a public authority for the purpose of any investigation which the authority has a duty to conduct with a view to it being ascertained whether a person should be charged with an offence. The section 30 exemption applies to information that is held at any time, whether or not the investigation is on-going.

In this case it is necessary to consider the failure to comply in order to reach a view whether a person or persons should be charged with a criminal offence.

Where there is not evidence of criminal activity, or in any event, the Commission may consider civil breaches. In so far as the investigation related to other potential breaches of PPERA, 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 any person has failed to comply with the law, as provided by s31 (2)(a) of the FOI Act. Section 31 applies only to the extent that the information is not exempt under section 30.

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 investigations such as in this matter.

This investigation is now closed. However, as noted above, the section 30 exemption applies to information that is held at any time, whether or not the investigation is on-going.

The Commission considers that the information you have requested is also exempt under s.31 (1)(a), prejudice to the prevention or detection or crime, and s.31(1)(b), prejudice to the apprehension or prosecution of offenders.

Applications of the section 30 and 31 exemption are both 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 inquiries as part of its investigation powers so that it can make regulatory decisions based on a firm factual basis and to gather such evidence and facts on a confidential basis. It is in the public interest to maintain this confidentiality, as it encourages the free and frank exchange of information from third parties to the Commission without which the Commission could not perform its statutory functions.

The Commission aims to be robust and fair in its regulatory decisions. We acknowledge that there is a legitimate public interest in carrying out investigations in an open and transparent way, and in promoting public understanding of the decisions we make 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.

In carrying out effective inquiries the Commission depends on being able to secure the co-operation of those individuals and entities from whom we seek information. Whilst the Commission has powers to require information, the co-operation of the regulated community and other enforcement agencies remains essential to our ability to conduct our statutory functions. As our investigations rely on gathering evidence from these organisations it is clearly in the public interest that we maintain their co-operation and avoid releasing information that could prevent exchange of relevant information in the future and have the effect of hindering our ability to conduct our statutory functions.

Those individuals and entities had and continue to have a reasonable expectation that information provided in the course of the investigation would not be made available to the public at large. If information provided in the course of our investigation was made public under the Act, it would make individuals and entities reluctant to co-operate and may prejudice interactions with them as well as others in the future. This would in turn impact on the type, timeliness, and quality of information provided to the Commission during its investigations which would prejudice the Commission's ability to conduct its statutory functions. The fact that the investigation has been closed does not affect the relevance of this.

Having carefully weighed the public interest relating to possible disclosure of the information requested under Sections 30(1) (a) (i), 31 (1) (g), 31(1)(a) and 31(1)(b), 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.

Some of the information contained in these documents contains personal data, such as direct contact information of staff members and the names and contact details of junior staff members, which is exempt under Section 40 of the FOI Act. These documents have been redacted prior to release. Further explanation of the exemption is provided below.

Section 40(2) and (3)(a)(i) of the FOI Act

Section 40 (2) provides for an exemption where the information requested constitutes personal data, some of which is sensitive personal data, as defined by the Data Protection Act (DPA), and where release of the information requested would breach one of the data protection principles. Some of the information we hold within the description of personal data as defined by section 1 of the DPA because the information relates directly to an identifiable living individual.

**7) details of the sanctions open to you against those bodies in 6 above who you believe to spend more than £10k.**

The Commission has published guidance for campaigners covering the list of individuals and organisations that are able to register and the list of individuals and organisations that are permissible donors at the EU Referendum. Our guidance is available here: http://www.electoralcommission.org.uk/i-am-a/party-or-campaigner/campaigners-in-referendums

The Commission has no regulatory remit in relation to non-UK entities. However, we could, where we deemed it appropriate to do so, contact non-UK bodies, to advise them of the controls on spending in the referendum. We also monitored campaign activity throughout the campaign and will take appropriate action if we identify any campaign activity that we consider may contravene the rules. Further information regarding our role as a regulator can be found here: http://www.electoralcommission.org.uk/our-work/roles-and-responsibilities/our-role-as-regulator-of-political-party-finances/sanctions

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: 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: http://www.ico.gov.uk

Yours sincerely

**Paul O'Malley**
**Information Adviser (Records Management)**
The Electoral Commission
3 Bunhill Row

London EC1Y 8YZ
Tel: 020 7271 [redacted]
Fax: 020 7271 0[redacted]
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

**Putting voters first**

Please consider the environment before printing this email.

---------- Original Message ----------
**From:** [redacted]
**Received:** 30/06/2016 20:50
**To:** PEF Inbox
[redacted]
**Subject:** RE: EFFD leaflets

[redacted]

[redacted]

Dear [redacted]

Thanks for this.

I, the EFDD and UKIP are fully conversant with the rules and I am confident there was no breach ; any leaflets given out in the controlled period being exeptions contrary to party rulings and well below the allowed limit of £10k.

No doubt we'll communicate again at some future election.

Best

[redacted]

---

**From:** [redacted]
**Sent:** 30 June 2016 15:19
**To:** [redacted]
**Subject:** RE: EFFD leaflets

Dear [redacted]

Thank you for your replies.

Although some of the leaflets were handed out in the regulated period, there is no breach so long as the total spent on those leaflets (and any other campaigning in that period) is under £10,000.

On the distribution, we do not have a name. The leaflet was handed out from a stall to an off-duty member of our Enforcement team.

If you carry out any campaigning in the future and have any further queries, please don't hesitate to get back in touch.

Best,

[redacted]
**Guidance Adviser**
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
[redacted]
Fax: 020 7271 0505
www.electoralcommission.org.uk

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---

**From:** [redacted]
**Sent:** 21 June 2016 23:20
**To:** PEF Inbox
**Cc:** [redacted]
**Subject:** RE: EFFD leaflets

Dear [redacted]

My responses in red below.

best

[redacted]

---

**From:** PEF Inbox [mailto:PEF@electoralcommission.org.uk]
**Sent:** 21 June 2016 17:06
**To:** [redacted]
**Subject:** RE: EFFD leaflets

Dear [redacted]

Thank you for your quick reply.

The pamphlets entitled 'The Truth About Trade Beyond the EU' were being distributed on 4 June 2016 in Church Street, High Wycombe, from a stall jointly run by Grassroots Out and UKIP.

**As you have twice already been made aware, UKIP's Party Chairman expressly forbade the distribution of EFDD branded items in the regulated period, communicating this to officers and members several times. Any member disregarding this may be subject to the full party internal disciplinary process. Did whoever reported this have the name of anybody so doing ?**

Given the close links between UKIP and the EFDD we would not consider UKIP activists to be a third party with respect to EFDD. EFDD material distributed by UKIP activists during the regulated period will therefore count towards the spending limit for EFDD. Since EFDD incurred the spending on the leaflets, EFDD must be in control of when the leaflets are distributed to the public.

**EFDD did indeed incur the expenditure on these pamphlets which went to UKIP. They were printed and distributed well before the regulated period with no intention whatsoever of their being distributed during the regulated period.**
**Neither EFDD nor UKIP can be held responsible if a rogue element disobeys the rules, but of course, as already stated, anybody found to have done so will be disciplined.**

The imprint requirements are not linked to material produced for electoral purposes, or referendum purposes. Rather, they apply to any material distributed in the regulated period which is "wholly or mainly relating to a referendum" (see PPERA s126(1)). This means that any of the EFDD leaflets distributed in the regulated period, like the 'Trade' leaflet, must have an imprint. .

**As already stated there was no intention for these pamphlets to be used during the regulated referendum period and therefore no requirement to carry an imprint.**

You have said that you do not know how many EFDD leaflets have been distributed during the regulated period. Can you please let us know:

- how many leaflets like the three mentioned in my previous email the EFDD Group produced in the months leading up to the beginning of the regulated period;
- how much they cost to produce; and
- ideally, perhaps by asking those people or groups to whom you delivered the leaflets, an estimate of the proportion of the leaflets that were distributed during the regulated period.

**That is not quite what I said or intended to say . As previously stated ,NOTHING BEARING EFDD BRANDING was intended, nor should have been, distributed during the regulated period**

**To provide details of the cost and numbers produced will require some research as all of those mentioned were produced months ago, one in fact last year . I will need to consult overseas colleagues to supply this info although I do not feel it is necessary as IN ALL CASES NONE WERE PRODUCED FOR USE IN THE REGULATED PERIOD.**

**As I have previously stated nothing should have been distributed in the regulated period and theoretically the answer should be ZERO BUT an infinitesimal amount may have ben by error exception.**

**I repeat that I am answering your questions in utmost good faith but as I have said before ElComm has no jurisdiction over foreign entities.**

On the matter of the leaflets you sent in, my apologies if we did not reply – I thought we had. We looked into each campaigner in the same way as if we had come across them in our own campaign monitoring. Where appropriate we contacted them in much the same way as I have contacted you.

**You will appreciate that it would be easy for opponents to claim to have received leaflets during the regulated period which were in the public domain before. From what you have reported so far there appears to be little of concern**

Kind regards,

[redacted]
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
[redacted]
Fax: 020 7271 0505
www.electoralcommission.org.uk

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image001.jpg

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---

**From:** [redacted]
**Sent:** 16 June 2016 15:17
**To:** PEF Inbox
**Cc:** [redacted]
**Subject:** Re: EFFD leaflets

Dear [redacted] I am currently abroad but I can confirm the following.. All items mentioned were paid for in full by the EFDD Group. None contain an imprint as this was not required as none were for electoral purposes OR for distribution in the regulated period of the Referendum. As we made yo aware clear instructions were given by UKIP NOT TO DISTRIBUTE ANY EFDD branded items in the referendum related period .In fact very few items would have been left from prior distribution. I am most interested to know where and by whom the leaflet was distributed on the 4th June as this would prima facie be a disciplinary offence. You will appreciate that once leaflets are in the public domain we have zero control over distribution by third-parties. I have already stated that we agreed not to use the £10k allowable limit. I am answering your questions willingly in utmost good faith but am amused that FOI responses show you have no jurisdiction over foreign bodies ; a failure in PPERA. Best regards [redacted]

Sent from my iPhone

On 16 Jun 2016, at 14:50, PEF Inbox <PEF@electoralcommission.org.uk> wrote:

Dear [redacted]

We have recently come across some leaflets through our campaign monitoring that appear to have been paid for and distributed by the EFDD Group.

One leaflet entitled “Your Country, Your Future, Your Vote” appears to be by the EFDD Group only. Another bears the names of EFDD, UKIP and the North East MEP Jonathan Arnott. Another is entitled “The Truth About Trade Beyond the EU”, and has EFDD and UKIP branding, as well as the name of William Dartmouth MEP. None of the leaflets contain a full imprint.

As you are aware, the regulated period before the referendum began on 15 April 2015 and runs until polling day on 23 June 2016. Referendum material distributed during this period is required to bear an imprint, and any spending on such material will count towards your spending total. This is the case even if the original spending was incurred before the regulated period.

We know that at least one of the leaflets was being distributed on 4 June 2016.

Can you please confirm:

- which organisation or individual incurred the spending on these leaflets;
- how many of these leaflets were distributed, or could be distributed, during the regulated period;
- how much was spent on those leaflets;
- whether there are any other EFDD leaflets that have been or will be distributed in the regulated period;
- how much was spent on those leaflets; and
- how much you expect the EFDD Group will have spent in total on referendum campaigning distributed during the whole regulated period.

If you cannot obtain exact figures, you could give the spending figures for the maximum number of leaflets that could have been distributed in the regulated period

Can you please also explain why the leaflets do not contain an imprint.

Please send us this information by Tuesday 21 June 2016. If you have any questions, or would like more time to respond, don’t hesitate to get in touch.

Kind regards,

[redacted]
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
[redacted]
Fax: 020 7271 0505
www.electoralcommission.org.uk

---------- Original Message ----------
[redacted]
**Received:** 27/04/2016 06:01
**To:** PEF Inbox
[redacted]
**Subject:** Re: referendum

[redacted]

[redacted]

Dear [redacted]

Thanks for this. I think it unlikely that we would wish or be able to register as a UK participant but have referred this along the chain and reserve the right to reconsider.

Best

[redacted]

Sent from my iPad

On 26 Apr 2016, at 13:17, PEF Inbox <PEF@electoralcommission.org.uk> wrote:

> Dear [redacted]l,
>
> Thank you for your email.
>
> **Registration**
> Only certain UK- or Gibraltar-based individuals and organisations can register as campaigners in the EU referendum. You can see the list of entities eligible to register on page 7 of this document. See also section 105 of PPERA and Schedule 1 paragraph 2 of the European Union Referendum Act 2015.
>
> As you know, since the EFDD Group in the European Parliament is not one of these entities, it cannot register.
>
> I cannot see your colleague's email that you refer to, but I note that the EFDD Group has a UK staff and offices. To register as a referendum campaigner you must fall within one of the categories listed in our guidance. You may wish to obtain your own advice as to whether you fall within one of the categories. Our earlier advice to you assumed that this is not the case, and that the UK offices of the EFDD are a branch of

the European organisation.

Please advise us of your view as to whether you can register under s105 of PPERA and Sch1 para 2 of the EU Referendum Act by 5pm on Tuesday next week.

**Donations**
If it were possible for the UK office of EFDD to register, it would be subject to the controls on donations to registered referendum campaigners. In particular, registered campaigners can only accept donations or loans from certain UK- or Gibraltar-based sources, which we call permissible sources. The list is similar to the list of entities that can register. You can see a list of permissible donors of page 6 of this document, and a list of permissible lenders of page 6 of this document.

Since the European Parliament and the EFDD Group are not entities on either of these lists, they are not permissible donors or permissible lenders.

I trust this is helpful. Please get in touch if you would like more time to respond.

Kind regards,

[redacted]
**Guidance Adviser**
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
[redacted]
Fax: 020 7271 0505
www.electoralcommission.org.uk

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[redacted]
**Sent:** 20 April 2016 11:23
**To:** PEF Inbox
[redacted]
**Subject:** FW: referendum

[redacted]

[redacted]

In previous communications you said that the European Parliament, EFDD Group as a foreign body could not register as a participant in the referendum.

However as my colleague states below we have a UK office within the European Parliament building in Smith Square , Westminster and a few UK based staff.

Can that office register as it is UK based and uses public funds deriving from UK contributions to the EU budget.

It has always been the EP intention that the EP Groups are free to participate in referendums but not elections
and EP rules are framed to facilitate such.

Do you have counsel's opinion to back up ElComm's restriction on otherwise lawful activity ?

An early answer would be appreciated.

Yours sincerely,

[redacted]

[redacted]

[redacted]

[redacted]

---

**From:** PEF Inbox
**Sent:** 10 May 2016 10:11
**To:** [redacted]
**Subject:** RE: Re S&D

Dear[redacted]

Thank you for sending this in.

The S&D Group is not registered as a campaigner. You can view a list of all currently registered campaigners on our website.

We will look into the issue. As you know the Commission takes compliance with the referendum rules seriously. We offer advice and guidance to campaigners and we are prepared to use our enforcement powers where necessary.

Kind regards,

[redacted]
**Guidance Adviser**
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
[redacted]
Fax: 020 7271 0505
www.electoralcommission.org.uk

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P Please consider the environment before printing this email

-----Original Message-----
From: [redacted]
Sent: 07 May 2016 11:31
To: PEF Inbox

Cc: [redacted]
Subject: FW: Re S&D

[redacted]

Dear [redacted]

The attached leaflet was distributed in Wales last week.

Have they registered the UK address as a separate UK legal entity for the referendum ?

If not what steps will you take re this possible abuse ?

Kindly advise what steps ElComm is taking to ensure there is no abuse by any of the European bodies that are not registered participants.

Regards

[redacted]

-----Original Message-----
From: [redacted]
Sent: 05 May 2016 09:15
To: [redacted]
Subject: Re S&D

Dear [redacted]

I have attached here a leaflet [redacted] put through my door - paid for by the S&D group

It was about a week ago

Is this a breach of rules?

[redacted]

**Sent:** 08 June 2016 10:51
**To:** [redacted]
**Subject:** RE: New contact form submission

Dear [redacted]

Thank you for your email.

You must not spend more than £10,000 on campaigning during the referendum period unless you have prior to doing so registered with us to become a 'registered campaigner'.

Only certain UK or Gibraltar based individuals and organisations can register as campaigners for the EU Referendum. The full list is available on page 9 of the guidance.

Please also note that only certain UK or Gibraltar based individuals and organisations can donate to referendum campaigners. You can find more information here: Permissibility for EU referendum campaigners

I hope the above is helpful to you. If you do have any further questions, please do not hesitate to contact the party and election finance advice line on 0333 103 1928 or e-mail the party and election finance inbox at pef@electoralcommission.org.uk.

Kind regards,

[redacted]
Party and Election Finance
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
[redacted]
Fax: 020 7271 0505
www.electoralcommission.org.uk

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P Please consider the environment before printing this email.

**From:** [redacted]
**Sent:** 30 May 2016 17:07

**To:** info_inbox
**Subject:** New contact form submission

- Your name: [redacted]
- Your email: [redacted]
- Your telephone number: [redacted]
- Your region/country: Other
- I am a...: a member of a political party
- Comment/enquiry type: candidate/party spending/funding
- Comments: Dear team from the electoral commission, I do have a urgent question which requires your attention. I'm the representative for all the european affairs of the french socialist party abroad. We have a Federation of almost 100 groups all over the world and since 2012, we are entitled to organize for the French Parti Socialiste, the primary and election for the MP of the French abroad. Since 2012, we got an access to the electoral list of the french abroad (like all the other political parties, association and private persons for non lucrative purposes). This mean concretely that we get every year by the local consulate and embassies in the world, the list of the registered voters everywhere. Under french regulation, the use of this list is regulated as following: for every political discussion and for helping to structurate the french community. We in the French Socialist Party are pro-europeans which want to promote the idea of a stronger Europe. Since almost 40% of the french community in the UK are binationals, we would like to send an email to our fellow-citizens asking them not to forget to register themselves on the voting list (so before the 7th of june). We will as well give some pro-Bremain arguments in the Email. What I would like to know is, if sending this email, which will actually cost us around 1000 pounds, is allowed or not? Are we de facto falling under the regulation for political parties or not? I would like to have a clear answer on the legal feasability of this, before sending this mail away. Thanks a lot for your quick answer. We would like to send this email before end of the week. Thanks. [redacted]
- Eich Enw:
- Eich e-bost:
- Eich rhif ffôn:
- Eich rhanbarth/gwlad:
- Rwyf yn...:
- Math o sylw/ymholiad:
- Sylwadau:

The Electoral Commission

His Excellency Péter Szabadhegy
Ambassador of Hungary
Embassy of Hungary
35 Eaton Place
London
SW1X 8BY

21 June 2016

By email to: [redacted]

Your Excellency,

**Rules on campaigning at the referendum on the UK's membership of the European Union**

The Electoral Commission is an independent organisation set up by the UK Parliament. Our role includes monitoring and ensuring compliance with the rules on campaign spending at referendums.

I note that the Hungarian Embassy have placed an advertisement in 20 June's Daily Mail relating to the referendum on the UK's membership of the European Union, signed by the Prime Minister of Hungary. I therefore wanted to contact you to provide a summary of the rules on referendum campaigning, which we are responsible for regulating.

In the run up to a referendum, there is a formal campaigning period called the 'referendum period' (15 April 2016 – 23 June 2016). During this period, referendum campaign spending limits and rules apply. The rules apply to spending on certain campaigning activities that are intended to promote or bring about a particular outcome in the referendum, and donations and loans that are received towards that spending.

Anyone can spend up to £10,000 on campaigning during the referendum period, but organisations and individuals must register with us before spending more than £10,000. As only certain UK and Gibraltar based entities are eligible to register, the Embassy of Hungary would not be eligible to register with us.

The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

Tel: 020 7271 0500
Fax: 020 7271 0505
info@electoralcommission.org.uk
www.electoralcommission.org.uk



INVESTOR IN PEOPLE
POSITIVE ABOUT DISABLED PEOPLE

The Electoral Commission

Although we have no legal powers to enforce the referendum requirements against a member state, we would ask you to abide by the spirit of UK law and voluntarily refrain from further activity that would mean spending over £10,000.

As you may also be aware there are restrictions on the UK and devolved governments and certain publicly funded bodies in the final 28 days of the referendum period under section 125 of the Political Parties, Elections and Referendums Act 2000. The restrictions relate to publishing general information about the referendum, the issues and arguments for or against the UK remaining or leaving the EU and encouraging people to vote. Again, although this restriction does not apply to the Hungarian Embassy we would ask you to voluntarily abide by this restriction.

I trust that you find this information helpful, particularly if you are considering any further advertising or other activities relating to the referendum prior to polling day on 23 June.

If you require any further information, please do not hesitate to contact the Commission's Party and Election Finance team on 0333 103 1928 or at pef@electoralcommission.org.uk

Yours sincerely

Bob Posner
Director of Party and Election Finance & Legal Counsel

The Electoral Commission

EMBASSY OF HUNGARY
LONDON

Mr Bob Posner
Legal Counsel & Director of Party and Election Finance
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

22 June 2016

Dr Mr Posner,

Thank you for your most informative letter of 21 June 2016, outlining the rules on campaigning at the referendum on the UK's membership of the European Union.

The rules are now well noted. We are not considering any further advertising related to the referendum.

Sincerely yours,

[redacted]

Dr Mária Vass-Salazar
Chargé d'Affaires a.i.

Embassy of Hungary - 35 Eaton Place London SW1X 8BY - Tel.: +44 (20) 7201 3440, - Fax: +44 (20) 7823 1348
E-mail: mission.lon@mfa.gov.hu

The Electoral Commission

Christine Lagarde
Managing Director
International Monetary Fund
700 19th Street. N.W.
Washington DC 20431
United States of America

27 May 2016

Dear Madam,

**Re: Referendum on the United Kingdom's membership of the European Union.**

As you are aware on the 23 June the United Kingdom will hold a referendum on its membership of the European Union. We are writing to advise the International Monetary Fund of the rules and to communicate our expectation that your organisation will abide by the rules.

The Electoral Commission is responsible for regulating the rules on funding and spending in the lead up to the referendum. There is a formal campaign period when the rules apply, this commenced on 15 April and ends on 23 June. During this period, campaigners must register with us if they spend more than £10,000 on certain activities that are intended to, or are otherwise in connection with, promoting or bringing about a particular outcome in the referendum. The activities are listed in our guidance on Spending and include material about the referendum that sets out expectations as to what might happen in the event of a particular outcome.

Spending must be reported after the referendum. Only certain entities are eligible to register and therefore able to spend more than £10,000. Entities that are **not** eligible to register must **not** spend more than £10,000 on referendum activity. More information on who can register can be found in our guidance. Entities based outside of the United Kingdom and Gibraltar are not eligible to register. This means that the IMF is not eligible to register and cannot spend more than £10,000.

We note that the IMF and in particular, you as Managing Director appeared at an event in London and in the course of that event released a report which covered the economic implications should the UK vote to leave the European Union. We note that this report

The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

Tel: 020 7271 0500
Fax: 020 7271 0505
info@electoralcommission.org.uk
www.electoralcommission.org.uk

The Electoral Commission

was produced in the ordinary course of your work and with the co-operation of HM Treasury. This report and the event launching it are likely to be considered campaigning for an outcome at the referendum such that the rules would apply.

There is an exclusion from the spending rules in respect of any property, services or facilities so far as those expenses fall to be met out of public funds. We are writing to ask whether the costs in relation to the production of this report and the event either remained under the £10,000 threshold for registration or were subject to the exclusion from the spending rules relating to payments made out of public funds.

There is a period before the referendum when there are further rules about what entities whose expenses are mainly or wholly paid out of public funds can publish. These rules apply from 27 May until 23 June and are set out in section 125 of the Political Parties, Elections and Referendums Act 2000. We note reports that your organisation is producing a further report for release in the week commencing 13 June 2016.
We expect that your organisation, in conjunction with HM Treasury will abide by the rules outlined above in the period leading up to the referendum. Our factsheet on this issue can be found here.

Please confirm the answers to our questions by **midday Friday 3 June 2016**.

Further information on how your organisations activities might be affected please see our guidance here.

Our full suite of referendum guidance is available here.

I hope the above is helpful to you. If you require any additional information, please contact me on [redacted]

Yours sincerely

[redacted]

**Bob Posner**
**Director of Party and Election Finance & Legal Counsel**

INTERNATIONAL MONETARY FUND
WASHINGTON, D.C. 20431

[redacted]

June 15, 2016

Mr. Bob Posner
Director of Party and Election Finance & Legal Counsel
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
United Kingdom

Dear Mr. Posner,

I am writing in response to your letter of May 27, 2016 to the Managing Director, Mme. Christine Lagarde.

Fund staff is grateful for the information you have provided to us on the rules governing the forthcoming referendum in the United Kingdom (the "UK"). However, we do not believe that these rules apply to our work on the Article IV consultation with the UK. Setting aside the application of these rules to the IMF more generally, we would note the following points.

We understand that, as a matter of UK law, the IMF statements and reports, including the IMF Managing Director's speech, referred to in your letter do not constitute regulated campaigning activity. These statements/reports are part of our regular consultations with the UK under Article IV of the IMF's Articles of Agreement which, as you have noted, are in the ordinary course of the IMF's work. They are not intended to promote or procure any particular outcome for the UK's EU membership referendum. For your information, the Fund holds such Article IV consultations with all of its 189 members. They are a crucial part of our surveillance mandate which requires us to assess risks that might require adjustments in members' economic or financial policies and to consider potential spillovers from members' policies on global stability. Given the potential global risks associated with a possible exit of the UK from the European Union, and the possible consequences for other members as well as the UK, it was (and remains) important for us to examine the issue and to make available our analysis in order to discharge this duty. In this regard, we understand that your own guidance on this issue envisages that such "business as usual" risk analysis likely would not constitute campaigning.

With respect to the funding of our work, the IMF is a public international organization and its activities are financed from its own resources. While these resources include quota payments received from all 189 IMF members, including the UK, we understand that they are not the type of "public funds" referred to in the UK's referendum laws. For the same reason, we

understand that the rules in section 125 of the Political Parties, Elections and Referendum Act to which you refer are not applicable as the IMF's expenses are not wholly or mainly defrayed out of relevant "public funds".

Finally, the IMF (as an international organization) has a special status under UK and international law (in particular, under Article IX of the IMF's Articles of Agreement) to enable it to carry out its functions, and we can provide you with further details if that would be useful.

I hope you find these clarifications to be helpful.

Yours sincerely,

[redacted]

Philip Gerson
Acting Director
European Department

[redacted]

**From:** [redacted]

**Sent:** 10 March 2016 10:52

**To:** [redacted]

**Cc:** [redacted]

**Subject:** RE: Electoral Commission overseas voters campaign CCM:0274634

Dear [redacted],

Thank you for your email.

You need to register with us if you spend over £10,000 on campaigning during the referendum period. Only certain (mostly UK or Gibraltar based) individuals and organisations can register with us. A full list is available on our guidance: Campaigning and registering for EU referendum campaigners. Further information on what constitutes referendum spending is available in our guidance: Spending for EU referendum campaigners.

The responsible person in the case of a registered political party must be the treasurer. In the case of a branch of a political party and subject to you being able to satisfy yourself that you could register, you can appoint a member of the organisation to be the responsible person.

Donations of £500 or less are not regulated donations and you do not need to record or report them. However, you should be alert to situations where it appears that a donor is attempting to evade the rules by making a series of small donations, for example, if a number of donations of £400 are made from the same source in similar circumstances.

Donations over £500 must come from permissible sources. A full list of permissible sources (again mostly UK or Gibraltar based) are available in our guidance: Permissibility for EU referendum campaigners. If you are sending funds back to the central party in the UK and the donations were solicited with the intention to send it back to the UK, the central party will also need to ensure that the original donors are permissible depending on the intent of the donation.

I hope the above is helpful to you. If you do have any further questions, please do not hesitate to contact the party and election finance advice line on 0333 103 1928 or e-mail the party and election finance inbox at pef@electoralcommission.org.uk.

Kind regards,

[redacted]
Party and Election Finance
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

Tel: 020 7271 [redacted]
Fax: 020 7271 [redacted]
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P Please consider the environment before printing this email.

**From:** [redacted]
**Sent:** 08 March 2016 17:19
**To:** Press
**Subject:** Fwd: Electoral Commission overseas voters campaign CCM:0274634

Dear Sir/Madam,

I would be most grateful if you could please respond in [redacted] absence, given we have an event in Brussels which will involve fund-raising on Wednesday 16th March.

Many thanks.

[redacted]
Brussels and Europe Liberal Democrats.
[redacted]

---------- Forwarded message ----------
From: [redacted]
Date: Tue, Mar 8, 2016 at 6:16 PM
Subject: Re: Electoral Commission overseas voters campaign CCM:0274634
To: [redacted]

Dear [redacted],

Thanks for helping us out. This is really appreciated.

We have a big meeting coming up in Brussels next week at the British Chamber of Commerce and would like to use this opportunity to iron out the referendum rules with you, as often our situation as the branch abroad of a UK-based political party seems a bit fuzzy when it comes to the rules:

1. Does the Brussels and Europe Liberal Democrat (BELD) branch in Brussels of the UK-registered Liberal Democrat party and/or its "Brits Abroad: Yes to Europe" campaign have to registered as a campaigning organisation?

2. Is our "responsible person" for our campaign automatically our BELD local branch party treasurer?

3. We understand that the maximum one-off donation by an unregistered disenfranchised British expat to any campaign , political party's campaign or directly to a political party is £500.

4. What are the donation limits for British Chamber of Commerce companies registered in Brussels to give either to our campaign or to the #INtogether campaign run by the UK-based Liberal Democrats headquarters? Can they give directly or can they only be asked to encourage their UK registered Headquarters to donate? As anything under £500 is not considered strictly as a donation, can British Chamber of Commerce companies give up to that amount even if they are not a permissible donor?

Any fund-raising is being done by BELD for its party in the UK and not for its "Brits Abroad: Yes to Europe" campaign which is a social media no cost campaign run by volunteers.

Based on this advice and any other you may offer, either you or we can write a few lines (to be cleared with you) which we will transmi tboth verbally and in writing to those attending the Chamber event next week, and thereafter.

[redacted] our treasurer in copy, may use this occasion if he has any other requests for clarification.

Any other advice welcome.

Best wishes.

[redacted]

On Wed, Mar 2, 2016 at 12:45 PM, [redacted] wrote:
Hi [redacted]

This is quite useful.

Many thanks,

[redacted]

> On 2 Mar 2016, at 09:38, [redacted] wrote:
>
> Hi [redacted]
>
> Most of our guidance for campaigners is now online, so best to take a look online first: http://www.electoralcommission.org.uk/i-am-a/party-or-campaigner/campaigners-in-referendums
>
> I would recommend that you read the rules on permissibility in particular: http://www.electoralcommission.org.uk/__data/assets/pdf_file/0007/194596/Permissibility-for-EU-referendum-campaigners.pdf

[redacted] – apologies for not responding to your earlier email about Commonwealth Day. We haven't planned anything specific, but if you are thinking of organising something for the day, do let me know.

Best wishes,
[redacted]

**From:** [redacted]
**Sent:** 01 March 2016 17:45
**To:** [redacted]
**Subject:** Re: Electoral Commission overseas voters campaign CCM:0274634

Dear [redacted],
Thank you for the excellent information and the efforts you are making to register those expats who still have the right to vote.
I would appreciate receiving the guidelines for fundraising for the referendum campaign please, both within and outside the UK. We will be holding one or two events in Brussels plus asking both enfranchised and disenfranchised expats and companies to donate.
Does it make a difference to donate to a campaign rather than a political party?
A cut and paste of the rules plus any commnets would be much appreciated.
Many thanks.
[redacted]

[redacted]
Brussels and Europe Lib Dems.

On Wed, Feb 24, 2016 at 12:28 PM, [redacted] wrote:
Hi [redacted]

I hope all is well. It was a pleasure speaking with you recently.

I wanted to introduce you to [redacted] who is [redacted] Brussels Liberal Democrats group, and [redacted] who is our [redacted]

We are organising activities around registering ex pats to vote and I'm sure [redacted] can go into some more detail. I thought it would be good for you to liaise.

There are useful attachments below FYI.

I had one questions are you doing anything on March 14th for Commonwealth day?

Thanks,

[redacted]

[redacted]

[redacted]

Thank you for speaking to me earlier.

As promised, I'm attaching some resources that may be of use to you. They really are for you to tailor to fit your campaign, but if you do choose to leave them as is and state that you're supporting the Electoral Commission's public awareness campaign please make sure that the message is apolitical. Ideally I'd like to see any messages mentioning the Electoral Commission before they are used.

I'm attaching a factsheet which outlines the ten key messages we want potential overseas voters to read. Other organisations have found the factsheet to be a useful starting point for their own materials so you can publish it as is or use the content as building blocks for an article/infographic/blog.

The second document is a template blog that organisations can use if interested. Again, you should probably tailor it for your audience to have the maximum impact (admittedly it's a little dry at the moment).

The final document contains suggested Twitter and Facebook messages that you can use on the day. You will notice at the top that there is a bitly link to the registration website – this is a trackable link that will allow us to see how many people have clicked on it to go to the registration website, so great if you could use that. I have also added in links to some photos from our Flickr page which you can use if you would like.

Hopefully some of this is useful. Do let us know how you get on if you do get involved on the day.

Best wishes,

[redacted]

[redacted]
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
[redacted]
Fax: 020 7271 0505
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http://www.electoralcommission.org.uk/i-am-a/journalist/electoral-commission-media-centre/news-releases-donations/electoral-commission-statement-on-assessment-of-ryanair-spending-on-eu-referendum-campaigning?



# Electoral Commission statement on assessment of Ryanair spending on EU Referendum campaigning

**News release published: 10-06-2016**

The Electoral Commission has today (10 June) announced that it has concluded its assessment into whether there was evidence that Ryanair may have breached referendum campaign spending rules set out in the Political Parties, Elections and Referendums Act (2000). The Commission found that the company's campaign spending has not exceeded £10,000, and accordingly, is satisfied that there are no reasonable grounds to suspect that a breach of PPERA has occurred.

As part of the Commission's monitoring of referendum campaign spending we identified that the company was undertaking campaign activities and have been in correspondence with Ryanair about this activity.

**Commenting on the assessment into Ryanair's campaign spending, an Electoral Commission spokesperson said:**

"We are satisfied, following an assessment that the available evidence suggests Ryanair has not spent in excess of £10,000 without registering as a campaigner for the EU referendum".

"We will continue to monitor campaign spending in the run-up to the referendum and take action if it is appropriate and necessary to do so in line with our established Enforcement Policy".

**Ends**

For further information contact Electoral Commission press office on 020 7271 0704 or press@electoralcommission.org.uk Out of office hours 07789 920 414

**Notes to editors**

1. The Electoral Commission is an independent body set up by the UK Parliament. Our aim is integrity and public confidence in the UK's democratic process. We regulate party and election finance and set standards for well-run elections and are responsible for the conduct and regulation of referendum held under the Political Parties, Elections and Referendums Act (2000).
2. Anyone can spend up to £10,000 on campaigning during the referendum period. The referendum period is when the rules on donations and spending apply and runs from 15 April 2016 up to and including polling day, 23 June 2016. Anyone intending to spend more than £10,000 must register with the Electoral Commission to become a 'registered campaigner'.
3. It is an offense under s117(3) and (4) of PPERA to spend in excess of £10,000 on campaign spending in a referendum without first registering with the Electoral Commission as a permitted participant.
4. For more information about the rules for campaigners during the referendum period, see the Commission's media handbook here

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

**Subject:** FW: OECD spending for the referendum on the UKs membership of the European Union CCM:0287052

**Attachments:** image001.jpg

Dear Sir,

As you are aware on the 23 June the United Kingdom will hold a referendum on it's membership of the European Union.

The Electoral Commission is responsible for regulating the rules on funding and spending in the lead up to the referendum. There is a formal campaign period when the rules apply, this commenced on 15 April and ends on 23 June. During this period, campaigners must register with us if they spend more than £10,000 on certain activities campaigning for an outcome. The activities are listed in our guidance on spending. Spending must be reported after the referendum. Donations and loans to campaigners must be reported both before and after the referendum. Only certain entities are eligible to register and therefore able to spend more than £10,000. Entities that are not eligible to register should not spend more than £10,000 on campaigning for an outcome at the referendum. More information on who can register can be found in our guidance. Entities based outside of the United Kingdom and Gibraltar are unlikely to be eligible to register.

We note that the OECD and in particular the Secretary General appeared at an event in London and in the course of that event released a report into the implications should the UK decide to leave the European Union. We trust the OECD costs in relation to this event remain under the £10,000 threshold for registration.

We are writing to advise the OECD of the rules and to communicate our expectation that the organisation will abide by the rules.

Further information on how your organisations activities might be affected please see our guidance here.

Our full suite of referendum guidance is available here.

I hope the above is helpful to you. If you have any further questions, or require any further clarification please do not hesitate to contact the party and election finance advice line on 0333 103 1928 or e-mail at pef@electoralcommission.org.uk

Kind regards,

[redacted]
**Senior Advisor (Guidance)**
**Party and Election Finance**
The Electoral Commission
3 Bunhill Row
London, EC1Y 8YZ
[redacted]
Fax: 020 7271 0505

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**www.aboutmyvote.co.uk**

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We welcome correspondence in Welsh and English

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

**Subject:** FW: Rules in relation to the United Kingdom's referendum on membership of the European Union CCM:0287053

**Attachments:** image001.jpg

Dear Sir/Madam,

We have previously tried to contact you via email to the following address: [redacted]

As you are aware on the 23 June the United Kingdom will hold a referendum on it's membership of the European Union.

The Electoral Commission is responsible for regulating the rules on funding and spending in the lead up to the referendum. There is a formal campaign period when the rules apply, this commenced on 15 April and ends on 23 June. During this period, campaigners must register with us if they spend more than £10,000 on certain activities campaigning for an outcome. The activities are listed in our guidance on spending. Spending must be reported after the referendum. Donations and loans to campaigners must be reported both before and after the referendum. Only certain entities are eligible to register and therefore able to spend more than £10,000. Entities that are not eligible to register should not spend more than £10,000 on campaigning for an outcome at the referendum. More information on who can register can be found in our guidance. Entities based outside of the United Kingdom and Gibraltar are unlikely to be eligible to register.

We note that the OECD and in particular the Secretary General appeared at an event in London and in the course of that event released a report into the implications should the UK decide to leave the European Union. We trust the OECD costs in relation to this event remain under the £10,000 threshold for registration.

We are writing to advise the OECD of the rules and to communicate our expectation that the organisation will abide by the rules. Please confirm that this is the case.

Further information on how your organisations activities might be affected please see our guidance here.

Our full suite of referendum guidance is available here.

I hope the above is helpful to you. If you have any further questions, or require any further clarification please do not hesitate to contact the party and election finance advice line on 0333 103 1928 or e-mail at pef@electoralcommission.org.uk

Kind regards,

[redacted]
**Party and Election Finance**
The Electoral Commission
3 Bunhill Row
London, EC1Y 8YZ
[redacted]
Fax: 020 7271 0505

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We welcome correspondence in Welsh and English

The Electoral Commission

Attn Angel Gurria Secretary-General
OECD
2, rue Andre Pascal
75775 Paris Cedex 16
France

18 May 2016

Dear Sir

As you are aware on the 23 June the United Kingdom will hold a referendum on it's membership of the European Union. We are writing to advise the OECD of the rules and to communicate our expectation that the organisation will abide by the rules.

The Electoral Commission is responsible for regulating the rules on funding and spending in the lead up to the referendum. There is a formal campaign period when the rules apply, this commenced on 15 April and ends on 23 June. During this period, campaigners must register with us if they spend more than £10,000 on certain activities campaigning for an outcome. The activities are listed in our guidance on spending.

Spending must be reported after the referendum. Donations and loans to campaigners must be reported both before and after the referendum. Only certain entities are eligible to register and therefore able to spend more than £10,000. Entities that are **not** eligible to register should **not** spend more than £10,000 on campaigning for an outcome at the referendum. More information on who can register can be found in our guidance. Entities based outside of the United Kingdom and Gibraltar are not eligible to register.

We note that the OECD and in particular, you as Secretary-General appeared at an event in London and in the course of that event released a report into the implications should the UK decide to leave the European Union. On the face of it, this report and event seem to have favoured one outcome over another. We trust the OECD costs in relation to this event remained under the £10,000 threshold for registration. Please confirm that this is the case by midday Friday 27 May 2016.

The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

Tel: 020 7271 0500
Fax: 020 7271 0505
info@electoralcommission.org.uk
www.electoralcommission.org.uk



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Further information on how your organisations activities might be affected please see our guidance here.

Our full suite of referendum guidance is available here.

I hope the above is helpful to you. If the OECD have any further questions, or require any further clarification please do not hesitate to contact the party and election finance advice line on 0333 103 1928 or e-mail at pef@electoralcommission.org.uk

Yours sincerely

[redacted]

**Bob Posner**
**Director of Party and Election Finance & Legal Counsel**

---------- Original Message ----------
**From:** [redacted]
**Received:** 27/05/2016 11:53
**To:** [redacted]
**Cc:** [redacted] Electoral Registers
**Subject:** The Referendum on the UK membership of the European Union

[redacted]

Dear [redacted]
I understand that you completed some work in conjunction with my colleague [redacted] in 2015.

We have been trying to contact the Legal Team at the OECD to discuss spending on the referendum on the UK's membership of the European Union. We have not had a response to our emails or letter.

I am writing to ask if you could provide us with a named contact in the Legal Team at the OECD so that we may draw their attention to our correspondence.

Thank you in anticipation. I am copying in my colleague [redacted] as I am on leave next week.

Kind regards,

[redacted]
**Party and Election Finance**
The Electoral Commission
3 Bunhill Row
London, EC1Y 8YZ
[redacted]
Fax: 020 7271 0505

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---------- Original Message ----------
**From:** [redacted]
**Received:** 10/06/2016 15:34
**To:** [redacted]
**Subject:** RE: Rules on the Uk's referendum on the European Union CCM:0273015

[redacted]

Please find attached Mr Posner's response for your urgent attention.

[redacted]
**Party and Election Finance**
The Electoral Commission
3 Bunhill Row
London, EC1Y 8YZ
[redacted]
Fax: 020 7271 0505

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---

**From:** [redacted]
**Sent:** 09 June 2016 12:59
**To:** [redacted]
**Cc:** [redacted]
**Subject:** RE: Rules on the Uk's referendum on the European Union

Dear [redacted]

Please find attached the response that the OECD's Legal Directorate provided on May 30. The hard copy should reach you either today or tomorrow.

Kind regards,

[redacted]

logo_mail_uk

[redacted]
Office of the OECD Secretary-General

2, rue André Pascal - 75775 Paris Cedex 16
[redacted] – Fax: +33 1 45 24 88 26
[redacted] | www.oecd.org

---

**From:** [redacted]
**Sent:** 09 June, 2016 1:28 PM
**To:** [redacted]
**Subject:** Rules on the Uk's referendum on the European Union

Dear [redacted],

As per your recent telephone conversation with my colleague [redacted]. Please find attached correspondence from the Director of Party and Election Finance and Legal Counsel at the Electoral Commission.

We have made several attempts to forward this to you and would appreciate a response by midday 13 June. Please keep me advised if this time frame cannot be met and whether you require any further information.

Kind regards,

[redacted]
**Party and Election Finance**
The Electoral Commission
3 Bunhill Row
London, EC1Y 8YZ
[redacted]
Fax: 020 7271 0505

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The Electoral Commission

Nicola Bonucci
Director and Accession Co-ordinator
OECD
2 rue Andre-Pascal
75775 Paris CEDEX 16
FRANCE

10 June 2016

Dear Sir

We acknowledge receipt of your correspondence dated 6 June 2016 and note your status as an intergovernmental organisation and your remit as outlined in your letter. In view of your status, we would expect you to comply voluntarily with the rules in any activities you undertake in the lead up to the referendum. That would be consistent with other comparable bodies who have or are inter-acting with matters relevant and potentially of influence on UK voters in the referendum.

Referendum spending is expenditure on certain campaigning activities that are intended to, or are otherwise in connection with, promoting or bringing about a particular outcome in the referendum, included in this are events such as that held at LSE and the production of reports that favour one outcome over another. There is an exclusion from the spending rules in respect of any property, services or facilities so far as those expenses fall to be met out of public funds. Staff costs also do not count towards any spending limit. We would reiterate that we expect that the cost of producing your report and the event either remained under the £10,000 threshold for registration or were subject to the exclusion from the spending rules relating to payments made out of public funds.

You will no doubt be aware that the section 125 of the Political parties, Elections and Referendums Act 2000 has placed restrictions on what governments can publish in the 28 days leading up to the referendum. We trust in the circumstances that you will comply with the intent of the legislation in the lead up to the referendum.'

Kindly confirm to us how the OECD will be proceeding. In view of the proximity of referendum polling day and current voting by post (which the UK system permits as of right), we would be grateful for your response by midday Tuesday 14 June.

The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

Tel: 020 7271 0500
Fax: 020 7271 0505
info@electoralcommission.org.uk
www.electoralcommission.org.uk



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I hope the above is helpful to you. If you require any additional information, please contact me on [redacted]

Yours sincerely

[redacted]

**Bob Posner**
**Director of Party and Election Finance & Legal Counsel**


OECD
BETTER POLICIES FOR BETTER LIVES

**Date received**: 09/06/2016

**Actioned date**: 09/06/2016

**Channel**: Call

**Query:**
Called switchboard of OECD Headquarters in Paris. Asked to speak with someone in the office of the Secretary-General.

**Response:**

Spoke with SG's personal assistant on the phone. Explained that the Electoral Commission had contacted the OECD via email with a letter attached and that they had missed the deadline for sending us a reply. She apologised for not responding to our previous email and asked that we forward it to her and copy in the SG's personal secretary in the email as well. They will make sure that the SG responds ASAP.

SG's [redacted]

SG's [redacted]

[redacted]

**From:** Kevin Molloy
**Sent:** 01 July 2016 13:02
**To:** Kevin Molloy
**Subject:** FW: RE: Rules on the Uk's referendum on the European Union CCM:0273015
**Attachments:** B Posner to N Bonucci (OECD) 10062016.pdf; image001.jpg; image002.png

---------- Original Message ----------
**From:** Denise Bottom
**Received:** 10/06/2016 15:34
**To:** [redacted]@oecd.org
**Subject:** RE: Rules on the Uk's referendum on the European Union CCM:0273015

Please find attached Mr Posner's response for your urgent attention.

**Denise Bottom**
**Senior Advisor (Guidance)**
**Party and Election Finance**
The Electoral Commission
3 Bunhill Row
London, EC1Y 8YZ
Tel: 020 7271 [redacted]
[redacted]

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**From:** [redacted]@oecd.org [redacted]@oecd.org]
**Sent:** 09 June 2016 12:59
**To:** Denise Bottom
**Cc:** DL1516@oecd.org
**Subject:** RE: Rules on the Uk's referendum on the European Union

Dear Ms. Bottom,

Please find attached the response that the OECD's Legal Directorate provided on May 30. The hard copy should reach you either today or tomorrow.

Kind regards,

Gabrielle



**Gabrielle McFarlane-Smith**
Office of the OECD Secretary-General

2, rue André Pascal - 75775 Paris Cedex 16
+(33-1) 45 24 80 13 – Fax: +33 1 45 24 88 26
Gabrielle.McFarlane-Smith@oecd.org | www.oecd.org

---

**From:** Denise Bottom [mailto[redacted]@electoralcommission.org.uk]
**Sent:** 09 June, 2016 1:28 PM
**To:** LEVASSEUR Lyndia, SGE; RESNICK Maria, SGE
**Subject:** Rules on the Uk's referendum on the European Union

Dear Ms Resnick and Ms Levassseur,

As per your recent telephone conversation with my colleague Robin Morris. Please find attached correspondence from the Director of Party and Election Finance and Legal Counsel at the Electoral Commission.

We have made several attempts to forward this to you and would appreciate a response by midday 13 June. Please keep me advised if this time frame cannot be met and whether you require any further information.

Kind regards,

**Denise Bottom**
**Senior Advisor (Guidance)**
**Party and Election Finance**
The Electoral Commission
3 Bunhill Row
London, EC1Y 8YZ
Tel: 020 7271[redacted]
Fax: 020 7271[redacted]

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## Harriet Fielding

**From:** Kevin Molloy
**Sent:** 01 July 2016 13:00
**To:** Kevin Molloy
**Subject:** FW: The Referendum on the UK membership of the European Union CCM:0287054
**Attachments:** image001.jpg

---------- Original Message ----------
**From:** Denise Bottom
**Received:** 27/05/2016 11:53
**To:** [redacted]@oecd.org
**Cc:** Andrew Whyte; Electoral Registers
**Subject:** The Referendum on the UK membership of the European Union

Dear Mr Burbank,

I understand that you completed some work in conjunction with my colleague Rupert Grist in 2015.

We have been trying to contact the Legal Team at the OECD to discuss spending on the referendum on the UK's membership of the European Union. We have not had a response to our emails or letter.

I am writing to ask if you could provide us with a named contact in the Legal Team at the OECD so that we may draw their attention to our correspondence.

Thank you in anticipation. I am copying in my colleague Andrew Whyte as I am on leave next week.

Kind regards,

**Denise Bottom**
**Senior Advisor (Guidance)**
**Party and Election Finance**
The Electoral Commission
3 Bunhill Row
London, EC1Y 8YZ
Tel: 020 7271 0[redacted]
Fax: 020 7271 [redacted]

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[redacted]

**From:** Kevin Molloy
**Sent:** 01 July 2016 12:57
**To:** Kevin Molloy
**Subject:** FW: OECD spending for the referendum on the UKs membership of the European Union CCM:0287052
**Attachments:** image001.jpg

---------- Original Message ----------
**From:** Denise Bottom
**Received:** 10/05/2016 16:03
**To:** [redacted]@oecd.org
**Subject:** OECD spending for the referendum on the UKs membership of the European Union

Dear Sir,

As you are aware on the 23 June the United Kingdom will hold a referendum on it's membership of the European Union.

The Electoral Commission is responsible for regulating the rules on funding and spending in the lead up to the referendum. There is a formal campaign period when the rules apply, this commenced on 15 April and ends on 23 June. During this period, campaigners must register with us if they spend more than £10,000 on certain activities campaigning for an outcome. The activities are listed in our guidance on spending. Spending must be reported after the referendum. Donations and loans to campaigners must be reported both before and after the referendum. Only certain entities are eligible to register and therefore able to spend more than £10,000. Entities that are not eligible to register should not spend more than £10,000 on campaigning for an outcome at the referendum. More information on who can register can be found in our guidance. Entities based outside of the United Kingdom and Gibraltar are unlikely to be eligible to register.

We note that the OECD and in particular the Secretary General appeared at an event in London and in the course of that event released a report into the implications should the UK decide to leave the European Union. We trust the OECD costs in relation to this event remain under the £10,000 threshold for registration.

We are writing to advise the OECD of the rules and to communicate our expectation that the organisation will abide by the rules.

Further information on how your organisations activities might be affected please see our guidance here.

Our full suite of referendum guidance is available here.

I hope the above is helpful to you. If you have any further questions, or require any further clarification please do not hesitate to contact the party and election finance advice line on 0333 103 1928 or e-mail at pef@electoralcommission.org.uk

Kind regards,

**Denise Bottom**
**Senior Advisor (Guidance)**

**Party and Election Finance**
The Electoral Commission
3 Bunhill Row
London, EC1Y 8YZ
Tel: 020 7271 [redacted]
Fax: 020 7271 [redacted]

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## Harriet Fielding

**From:** Kevin Molloy
**Sent:** 01 July 2016 12:57
**To:** Kevin Molloy
**Subject:** FW: Rules in relation to the United Kingdom's referendum on membership of the European Union CCM:0287053
**Attachments:** image001.jpg

---------- Original Message ----------
**From:** Denise Bottom
**Received:** 12/05/2016 13:11
**To:** Legal@oecd.org
**Subject:** Rules in relation to the United Kingdom's referendum on membership of the European Union

Dear Sir/Madam,

We have previously tried to contact you via email to the following address: [redacted]@oecd.org

As you are aware on the 23 June the United Kingdom will hold a referendum on it's membership of the European Union.

The Electoral Commission is responsible for regulating the rules on funding and spending in the lead up to the referendum. There is a formal campaign period when the rules apply, this commenced on 15 April and ends on 23 June. During this period, campaigners must register with us if they spend more than £10,000 on certain activities campaigning for an outcome. The activities are listed in our guidance on spending. Spending must be reported after the referendum. Donations and loans to campaigners must be reported both before and after the referendum. Only certain entities are eligible to register and therefore able to spend more than £10,000. Entities that are not eligible to register should not spend more than £10,000 on campaigning for an outcome at the referendum. More information on who can register can be found in our guidance. Entities based outside of the United Kingdom and Gibraltar are unlikely to be eligible to register.

We note that the OECD and in particular the Secretary General appeared at an event in London and in the course of that event released a report into the implications should the UK decide to leave the European Union. We trust the OECD costs in relation to this event remain under the £10,000 threshold for registration.

We are writing to advise the OECD of the rules and to communicate our expectation that the organisation will abide by the rules. Please confirm that this is the case.

Further information on how your organisations activities might be affected please see our guidance here.

Our full suite of referendum guidance is available here.

I hope the above is helpful to you. If you have any further questions, or require any further clarification please do not hesitate to contact the party and election finance advice line on 0333 103 1928 or e-mail at pef@electoralcommission.org.uk

Kind regards,

**Denise Bottom**
**Senior Advisor (Guidance)**
**Party and Election Finance**
The Electoral Commission
3 Bunhill Row
London, EC1Y 8YZ
Tel: 020 7271 [redacted]
Fax: 020 7271 [redacted]

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**Harriet Fielding**

**From:** Kevin Molloy
**Sent:** 10 March 2016 10:52
**To:** [redacted]@gmail.com'
**Cc:** [redacted]@bearder.eu'; [redacted]@bearder.eu'; [redacted]@libdems.org.uk'; [redacted]@fleishmaneurope.com'; [redacted]@yahoo.com'; [redacted]@europarl.europa.eu'; [redacted]@gmail.com'; [redacted]
**Subject:** RE: Electoral Commission overseas voters campaign CCM:0274634

Dear [redacted]

Thank you for your email.

You need to register with us if you spend over £10,000 on campaigning during the referendum period. Only certain (mostly UK or Gibraltar based) individuals and organisations can register with us. A full list is available on our guidance: Campaigning and registering for EU referendum campaigners. Further information on what constitutes referendum spending is available in our guidance: Spending for EU referendum campaigners.

The responsible person in the case of a registered political party must be the treasurer. In the case of a branch of a political party and subject to you being able to satisfy yourself that you could register, you can appoint a member of the organisation to be the responsible person.

Donations of £500 or less are not regulated donations and you do not need to record or report them. However, you should be alert to situations where it appears that a donor is attempting to evade the rules by making a series of small donations, for example, if a number of donations of £400 are made from the same source in similar circumstances.

Donations over £500 must come from permissible sources. A full list of permissible sources (again mostly UK or Gibraltar based) are available in our guidance: Permissibility for EU referendum campaigners. If you are sending funds back to the central party in the UK and the donations were solicited with the intention to send it back to the UK, the central party will also need to ensure that the original donors are permissible depending on the intent of the donation.

I hope the above is helpful to you. If you do have any further questions, please do not hesitate to contact the party and election finance advice line on 0333 103 1928 or e-mail the party and election finance inbox at pef@electoralcommission.org.uk.

Kind regards,

**Kevin Molloy**
**Guidance Adviser**
Party and Election Finance
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
Tel: 020 7271 0[redacted]
Fax: 020 7271 [redacted]
www.electoralcommission.org.uk

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P Please consider the environment before printing this email.

**From:** [redacted]@gmail.com]
**Sent:** 08 March 2016 17:19
**To:** Press
**Subject:** Fwd: Electoral Commission overseas voters campaign CCM:0274634

Dear Sir/Madam,

I would be most grateful if you could please respond in Mazida's absence, given we have an event in Brussels which will involve fund-raising on Wednesday 16th March.

Many thanks.

[redacted], Chair,
Brussels and Europe Liberal Democrats.
Mobile: [redacted]

---------- Forwarded message ----------
From: [redacted]
Date: Tue, Mar 8, 2016 at 6:16 PM
Subject: Re: Electoral Commission overseas voters campaign CCM:0274634
To: Mazida Khatun [redacted]@electoralcommission.org.uk>
Cc: [redacted]@bearder.eu" [redacted]@bearder.eu>, [redacted]@libdems.org.uk>, [redacted]@fleishmaneurope.com>, [redacted]@yahoo.com" [redacted]@yahoo.com>, [redacted]@europarl.europa.eu>, [redacted]@gmail.com>

Dear [redacted]

Thanks for helping us out. This is really appreciated.

We have a big meeting coming up in Brussels next week at the British Chamber of Commerce and would like to use this opportunity to iron out the referendum rules with you, as often our situation as the branch abroad of a UK-based political party seems a bit fuzzy when it comes to the rules:

1. Does the Brussels and Europe Liberal Democrat (BELD) branch in Brussels of the UK-registered Liberal Democrat party and/or its "Brits Abroad: Yes to Europe" campaign have to registered as a campaigning organisation?

2. Is our "responsible person" for our campaign automatically our BELD local branch party treasurer?

3. We understand that the maximum one-off donation by an unregistered disenfranchised British expat to any campaign , political party's campaign or directly to a political party is £500.

4. What are the donation limits for British Chamber of Commerce companies registered in Brussels to give either to our campaign or to the #INtogether campaign run by the UK-based Liberal Democrats headquarters? Can they give directly or can they only be asked to encourage their UK registered

Headquarters to donate? As anything under £500 is not considered strictly as a donation, can British Chamber of Commerce companies give up to that amount even if they are not a permissible donor?

Any fund-raising is being done by BELD for its party in the UK and not for its "Brits Abroad: Yes to Europe" campaign which is a social media no cost campaign run by volunteers.

Based on this advice and any other you may offer, either you or we can write a few lines (to be cleared with you) which we will transmi tboth verbally and in writing to those attending the Chamber event next week, and thereafter.

Freddie van Mierlo, our treasurer in copy, may use this occasion if he has any other requests for clarification.

Any other advice welcome.

Best wishes.

[redacted]

On Wed, Mar 2, 2016 at 12:45 PM, [redacted]libdems.org.uk> wrote:
Hi Mazida,

This is quite  useful.

Many thanks,

[redacted]

> On 2 Mar 2016, at 09:38, Mazida Khatun [redacted]@electoralcommission.org.uk> wrote:
>
> Hi [redacted]
>
> Most of our guidance for campaigners is now online, so best to take a look online first: http://www.electoralcommission.org.uk/i-am-a/party-or-campaigner/campaigners-in-referendums
>
> I would recommend that you read the rules on permissibility in particular: http://www.electoralcommission.org.uk/__data/assets/pdf_file/0007/194596/Permissibility-for-EU-referendum-campaigners.pdf
>
> [redacted]– apologies for not responding to your earlier email about Commonwealth Day. We haven't planned anything specific, but if you are thinking of organising something for the day, do let me know.
>
> Best wishes,
> [redacted]
>
> **From:** [redacted]@gmail.com]
> **Sent:** 01 March 2016 17:45
> **To:** [redacted]
> **Cc:** [redacted]@bearder.eu; [redacted]@yahoo.com
> **Subject:** Re: Electoral Commission overseas voters campaign CCM:0274634

Dear [redacted]
Thank you for the excellent information and the efforts you are making to register those expats who still have the right to vote.
I would appreciate receiving the guidelines for fundraising for the referendum campaign please, both within and outside the UK. We will be holding one or two events in Brussels plus asking both enfranchised and disenfranchised expats and companies to donate.
Does it make a difference to donate to a campaign rather than a political party?
A cut and paste of the rules plus any commnets would be much appreciated.
Many thanks.
George.

George Cunningham, Chair,
Brussels and Europe Lib Dems.

On Wed, Feb 24, 2016 at 12:28 PM, [redacted]@libdems.org.uk> wrote:
Hi Mazida,

I hope all is well. It was a pleasure speaking with you recently.

I wanted to introduce you to George Cunningham, who is the Chair of our Brussels Liberal Democrats group, and Elliot who is our EU Referendum regional campaign co-ordinator.

We are organising activities around registering ex pats to vote and I'm sure George can go into some more detail. I thought it would be good for you to liaise.

There are useful attachments below FYI.

I had one questions are you doing anything on March 14th for Commonwealth day?

Thanks,

[redacted]

Hi [redacted]

Thank you for speaking to me earlier.

As promised, I'm attaching some resources that may be of use to you. They really are for you to tailor to fit your campaign, but if you do choose to leave them as is and state that you're supporting the Electoral Commission's public awareness campaign please make sure that the message is apolitical. Ideally I'd like to see any messages mentioning the Electoral Commission before they are used.

I'm attaching a factsheet which outlines the ten key messages we want potential overseas voters to read. Other organisations have found the factsheet to be a useful starting point for their own materials so you can publish it as is or use the content as building blocks for an article/infographic/blog.

The second document is a template blog that organisations can use if interested. Again, you should probably tailor it for your audience to have the maximum impact (admittedly it's a little dry at the moment).

The final document contains suggested Twitter and Facebook messages that you can use on the day. You will notice at the top that there is a bitly link to the registration website – this is a trackable link that will allow us to see how many people have clicked on it to go to the registration website, so great if you could use that. I have also added in links to some photos from our Flickr page which you can use if you would like.

Hopefully some of this is useful. Do let us know how you get on if you do get involved on the day.

Best wishes,
Mazida

**Mazida Khatun**
**Senior Communications Officer**
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
Tel: 020 7271 [redacted]
Fax: 020 7271 [redacted]
www.electoralcommission.org.uk
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## Harriet Fielding

**From:** [redacted]
**Sent:** 05 July 2016 14:50
**To:** [redacted]
**Subject:** FW: Re S&D

You may not need this one

---

**From:** PEF Inbox
**Sent:** 10 May 2016 10:11
**To:** [redacted]@gmail.com'
**Subject:** RE: Re S&D

Dear [redacted]

Thank you for sending this in.

The S&D Group is not registered as a campaigner. You can view a list of all currently registered campaigners on our website.

We will look into the issue. As you know the Commission takes compliance with the referendum rules seriously. We offer advice and guidance to campaigners and we are prepared to use our enforcement powers where necessary.

Kind regards,

[redacted]
**Guidance Adviser**
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
Tel: 020 7271 [redacted]
Fax: 020 7271 [redacted]
www.electoralcommission.org.uk

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-----Original Message-----
From: [redacted]@gmail.com]
Sent: 07 May 2016 11:31
To: PEF Inbox
Cc [redacted]
[redacted] Re S&D

[redacted]

Dear [redacted]

The attached leaflet was distributed in Wales last week.

Have they registered the UK address as a separate UK legal entity for the referendum ?

If not what steps will you take re this possible abuse ?

Kindly advise what steps ElComm is taking to ensure there is no abuse by any of the European bodies that are not registered participants.

Regards

[redacted]

-----Original Message-----
From: [redacted]1@aol.com]
Sent: 05 May 2016 09:15
To: Legal Ukip [redacted]@ukip.org>; [redacted]@gmail.com>
Subject: Re S&D

Dear [redacted]

I have attached here a leaflet [redacted] put through my door - paid for by the S&D group

It was about a week ago

Is this a breach of rules?

[redacted]

**From:** Kevin Molloy
**Sent:** 08 June 2016 10:51
**To:** [redacted]@richard-molard.eu'
**Subject:** RE: New contact form submission

Dear [redacted]

Thank you for your email.

You must not spend more than £10,000 on campaigning during the referendum period unless you have prior to doing so registered with us to become a 'registered campaigner'.

Only certain UK or Gibraltar based individuals and organisations can register as campaigners for the EU Referendum. The full list is available on page 9 of the guidance.

Please also note that only certain UK or Gibraltar based individuals and organisations can donate to referendum campaigners. You can find more information here: Permissibility for EU referendum campaigners

I hope the above is helpful to you. If you do have any further questions, please do not hesitate to contact the party and election finance advice line on 0333 103 1928 or e-mail the party and election finance inbox at pef@electoralcommission.org.uk.

Kind regards,

**Kevin Molloy**
**Guidance Adviser**
Party and Election Finance
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
Tel: 020 7271 [redacted]
Fax: 020 7271 [redacted]
www.electoralcommission.org.uk

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P Please consider the environment before printing this email.

**From:** [redacted]@richard-molard.eu]
**Sent:** 30 May 2016 17:07
**To:** info_inbox
**Subject:** New contact form submission

- Your name: [redacted]
- Your email: [redacted]@richard-molard.eu
- Your telephone number: +32484831317
- Your region/country: Other
- I am a...: a member of a political party
- Comment/enquiry type: candidate/party spending/funding
- Comments: Dear team from the electoral commission, I do have a urgent question which requires your attention. I'm the representative for all the european affairs of the french socialist party abroad. We have a Federation of almost 100 groups all over the world and since 2012, we are entitled to organize for the French Parti Socialiste, the primary and election for the MP of the French abroad. Since 2012, we got an access to the electoral list of the french abroad (like all the other political parties, association and private persons for non lucrative purposes). This mean concretely that we get every year by the local consulate and embassies in the world, the list of the registered voters everywhere. Under french regulation, the use of this list is regulated as following: for every political discussion and for helping to structurate the french community. We in the French Socialist Party are pro-europeans which want to promote the idea of a stronger Europe. Since almost 40% of the french community in the UK are binationals, we would like to send an email to our fellow-citizens asking them not to forget to register themselves on the voting list (so before the 7th of june). We will as well give some pro-Bremain arguments in the Email. What I would like to know is, if sending this email, which will actually cost us around 1000 pounds, is allowed or not? Are we de facto falling under the regulation for political parties or not? I would like to have a clear answer on the legal feasability of this, before sending this mail away. Thanks a lot for your quick answer. We would like to send this email before end of the week. Thanks. [redacted]
- Eich Enw:
- Eich e-bost:
- Eich rhif ffôn:
- Eich rhanbarth/gwlad:
- Rwyf yn...:
- Math o sylw/ymholiad:
- Sylwadau:

## Harriet Fielding

**From:** Kevin Molloy
**Sent:** 04 July 2016 12:11
**To:** Kevin Molloy
**Subject:** FW: RE: EFFD leaflets CCM:0287059
**Attachments:** image001.jpg

---------- Original Message ----------
**From:** [redacted]
**Received:** 30/06/2016 20:50
**To:** PEF Inbox
**Cc:** [redacted]@europarl.europa.eu; [redacted]europarl.europa.eu; [redacted]; UKIP Legal
**Subject:** RE: EFFD leaflets

Dear [redacted]

Thanks for this.

I, the EFDD and UKIP are fully conversant with the rules and I am confident there was no breach ; any leaflets given out in the controlled period being exeptions contrary to party rulings and well below the allowed limit of £10k.

No doubt we'll communicate again at some future election.

Best

[redacted]

---

**From:** PEF Inbox [mailto:PEF@electoralcommission.org.uk]
**Sent:** 30 June 2016 15:19
**To:** [redacted]@gmail.com>
**Subject:** RE: EFFD leaflets

Dear [redacted]

Thank you for your replies.

Although some of the leaflets were handed out in the regulated period, there is no breach so long as the total spent on those leaflets (and any other campaigning in that period) is under £10,000.

On the distribution, we do not have a name. The leaflet was handed out from a stall to an off-duty member of our Enforcement team.

If you carry out any campaigning in the future and have any further queries, please don't hesitate to get back in touch.

Best,

[redacted]

**Sam Nicholson**
**Guidance Adviser**
The Electoral Commission

3 Bunhill Row
London EC1Y 8YZ
Tel: 020 7271 [redacted]
Fax: 020 7271 [redacted]
www.electoralcommission.org.uk

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**From:** [redacted]@gmail.com]
**Sent:** 21 June 2016 23:20
**To:** PEF Inbox
**Cc:** 'Stephen Crowther'; 'UKIP Legal'
**Subject:** RE: EFFD leaflets

Dear Sam,

My responses in red below.

best

[redacted]

---

**From:** PEF Inbox [mailto:PEF@electoralcommission.org.uk]
**Sent:** 21 June 2016 17:06
**To:** [redacted]@gmail.com
**Subject:** RE: EFFD leaflets

Dear Michael,

Thank you for your quick reply.

The pamphlets entitled 'The Truth About Trade Beyond the EU' were being distributed on 4 June 2016 in Church Street, High Wycombe, from a stall jointly run by Grassroots Out and UKIP.

**As you have twice already been made aware, UKIP's Party Chairman expressly forbade the distribution of EFDD branded items in the regulated period, communicating this to officers and members several times. Any member disregarding this may be subject to the full party internal disciplinary process. Did whoever reported this have the name of anybody so doing ?**

Given the close links between UKIP and the EFDD we would not consider UKIP activists to be a third party with respect to EFDD. EFDD material distributed by UKIP activists during the regulated period will therefore count towards the spending limit for EFDD. Since EFDD incurred the spending on the leaflets, EFDD must be in control of when the leaflets are distributed to the public.

**EFDD did indeed incur the expenditure on these pamphlets which went to UKIP. They were printed and distributed well before the regulated period with no intention whatsoever of their being distributed during the regulated period.**

**Neither EFDD nor UKIP can be held responsible if a rogue element disobeys the rules, but of course, as already stated, anybody found to have done so will be disciplined.**

The imprint requirements are not linked to material produced for electoral purposes, or referendum purposes. Rather, they apply to any material distributed in the regulated period which is "wholly or mainly relating to a referendum" (see PPERA s126(1)). This means that any of the EFDD leaflets distributed in the regulated period, like the 'Trade' leaflet, must have an imprint. .

**As already stated there was no intention for these pamphlets to be used during the regulated referendum period and therefore no requirement to carry an imprint.**

You have said that you do not know how many EFDD leaflets have been distributed during the regulated period. Can you please let us know:

- how many leaflets like the three mentioned in my previous email the EFDD Group produced in the months leading up to the beginning of the regulated period;
- how much they cost to produce; and
- ideally, perhaps by asking those people or groups to whom you delivered the leaflets, an estimate of the proportion of the leaflets that were distributed during the regulated period.

**That is not quite what I said or intended to say . As previously stated ,NOTHING BEARING EFDD BRANDING was intended, nor should have been, distributed during the regulated period**

**To provide details of the cost and numbers produced will require some research as all of those mentioned were produced months ago, one in fact last year . I will need to consult overseas colleagues to supply this info although I do not feel it is necessary as IN ALL CASES NONE WERE PRODUCED FOR USE IN THE REGULATED PERIOD.**

**As I have previously stated nothing should have been distributed in the regulated period and theoretically the answer should be ZERO BUT an infinitesimal amount may have ben by error exception.**

**I repeat that I am answering your questions in utmost good faith but as I have said before ElComm has no jurisdiction over foreign entities.**

On the matter of the leaflets you sent in, my apologies if we did not reply – I thought we had. We looked into each campaigner in the same way as if we had come across them in our own campaign monitoring. Where appropriate we contacted them in much the same way as I have contacted you.

**You will appreciate that it would be easy for opponents to claim to have received leaflets during the regulated period which were in the public domain before. From what you have reported so far there appears to be little of concern**

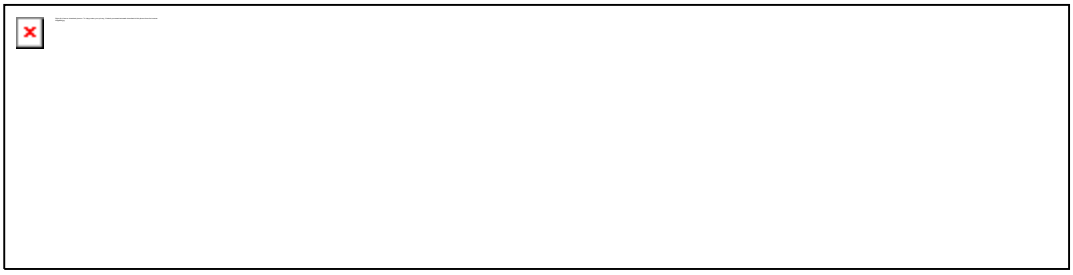
Kind regards,

Sa [redacted]
**Guidance Adviser**
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
Tel: 020 7271 [redacted]
Fax: 020 7271 [redacted]

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**From:** [redacted]@gmail.com]
**Sent:** 16 June 2016 15:17
**To:** PEF Inbox
**Cc:** Mick; Nele De Smedt
**Subject:** Re: EFFD leaflets

Dear Sam, I am currently abroad but I can confirm the following.. All items mentioned were paid for in full by the EFDD Group. None contain an imprint as this was not required as none were for electoral purposes OR for distribution in the regulated period of the Referendum. As we made yo aware clear instructions were given by UKIP NOT TO DISTRIBUTE ANY EFDD branded items in the referendum related period .In fact very few items would have been left from prior distribution. I am most interested to know where and by whom the leaflet was distributed on the 4th June as this would prima facie be a disciplinary offence. You will appreciate that once leaflets are in the public domain we have zero control over distribution by third-parties. I have already stated that we agreed not to use the £10k allowable limit. I am answering your questions willingly in utmost good faith but am amused that FOI responses show you have no jurisdiction over foreign bodies ; a failure in PPERA. Best regards michael

Sent from my iPhone

On 16 Jun 2016, at 14:50, PEF Inbox <PEF@electoralcommission.org.uk> wrote:

> Dear Michael,
>
> We have recently come across some leaflets through our campaign monitoring that appear to have been paid for and distributed by the EFDD Group.
>
> One leaflet entitled “Your Country, Your Future, Your Vote” appears to be by the EFDD Group only. Another bears the names of EFDD, UKIP and the North East MEP Jonathan Arnott. Another is entitled “The Truth About Trade Beyond the EU”, and has EFDD and UKIP branding, as well as the name of William Dartmouth MEP. None of the leaflets contain a full imprint.
>
> As you are aware, the regulated period before the referendum began on 15 April 2015 and runs until polling day on 23 June 2016. Referendum material distributed during this period is required to bear an imprint, and any spending on such material

will count towards your spending total. This is the case even if the original spending was incurred before the regulated period.

We know that at least one of the leaflets was being distributed on 4 June 2016.

Can you please confirm:

- which organisation or individual incurred the spending on these leaflets;
- how many of these leaflets were distributed, or could be distributed, during the regulated period;
- how much was spent on those leaflets;
- whether there are any other EFDD leaflets that have been or will be distributed in the regulated period;
- how much was spent on those leaflets; and
- how much you expect the EFDD Group will have spent in total on referendum campaigning distributed during the whole regulated period.

If you cannot obtain exact figures, you could give the spending figures for the maximum number of leaflets that could have been distributed in the regulated period

Can you please also explain why the leaflets do not contain an imprint.

Please send us this information by Tuesday 21 June 2016. If you have any questions, or would like more time to respond, don't hesitate to get in touch.

Kind regards,

Sam
**Sam Nicholson**
**Guidance Adviser**
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
Tel: 020 7271 [redacted]
Fax: 020 7271 0[redacted]
www.electoralcommission.org.uk

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**<image001.jpg>**

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## Harriet Fielding

**From:** Kevin Molloy
**Sent:** 04 July 2016 12:27
**To:** Kevin Molloy
**Subject:** FW: Re: referendum CCM:0287061

---------- Original Message ----------
**From:** [redacted]
**Received:** 27/04/2016 06:01
**To:** PEF Inbox
**Cc:** [redacted]@aol.com; [redacted]@europarl.europa.eu
**Subject:** Re: referendum

Fao Sam Nicholson

Dear Sam,

Thanks for this. I think it unlikely that we would wish or be able to register as a UK participant but have referred this along the chain and reserve the right to reconsider.

Best

Michael

Sent from my iPad

On 26 Apr 2016, at 13:17, PEF Inbox <PEF@electoralcommission.org.uk> wrote:

> Dear Michael,
>
> Thank you for your email.
>
> ### Registration
> Only certain UK- or Gibraltar-based individuals and organisations can register as campaigners in the EU referendum. You can see the list of entities eligible to register on page 7 of this document. See also section 105 of PPERA and Schedule 1 paragraph 2 of the European Union Referendum Act 2015.
>
> As you know, since the EFDD Group in the European Parliament is not one of these entities, it cannot register.
>
> I cannot see your colleague's email that you refer to, but I note that the EFDD Group has a UK staff and offices. To register as a referendum campaigner you must fall within one of the categories listed in our guidance. You may wish to obtain your own advice as to whether you fall within one of the categories. Our earlier advice to you assumed that this is not the case, and that the UK offices of the EFDD are a branch of the European organisation.
>
> Please advise us of your view as to whether you can register under s105 of PPERA and Sch1 para 2 of the EU Referendum Act by 5pm on Tuesday next week.
>
> ### Donations

If it were possible for the UK office of EFDD to register, it would be subject to the controls on donations to registered referendum campaigners. In particular, registered campaigners can only accept donations or loans from certain UK- or Gibraltar-based sources, which we call permissible sources. The list is similar to the list of entities that can register. You can see a list of permissible donors of page 6 of this document, and a list of permissible lenders of page 6 of this document.

Since the European Parliament and the EFDD Group are not entities on either of these lists, they are not permissible donors or permissible lenders.

I trust this is helpful. Please get in touch if you would like more time to respond.

Kind regards,

Sam
**Sam Nicholson**
**Guidance Adviser**
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
Tel: 020 7271 [redacted]
Fax: 020 7271 [redacted]
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**From:** [redacted]@gmail.com]
**Sent:** 20 April 2016 11:23
**To:** PEF Inbox
**Cc:** 'Nele De-Smedt'
**Subject:** FW: referendum

fao [redacted]

Dear Sam,

In previous communications you said that the European Parliament, EFDD Group as a foreign body could not register as a participant in the referendum.

However as my colleague states below we have a UK office within the European Parliament building in Smith Square , Westminster and a few UK based staff.

Can that office register as it is UK based and uses public funds deriving from UK contributions to the EU budget.

It has always been the EP intention that the EP Groups are free to participate in referendums but not elections
and EP rules are framed to facilitate such.

Do you have counsel's opinion to back up ElComm's restriction on otherwise lawful activity ?

An early answer would be appreciated.

Yours sincerely,

Michael

[redacted]

**From:** FOI
**Sent:** 08 July 2016 14:26
**To:** [redacted] polling cards [Part 3] - remaining documentation
**Attachments:** 7.5.2 B Posner to N Bonucci (OECD).pdf; 7.5.3 N Bonucci (OECD) to B Posner.pdf; 7.5.4 B Posner to N Bonucci (OECD).pdf; FW: Campaigning at the referendum on the UK's membership of the European Union CCM:0287057; 8.1 Email to S and D MEP about leaflets.pdf; FW: S&D Group leaflet CCM:0237087; 8.2 Email from S and D about leaflets.pdf; FW: RE: EU referendum leaflet CCM:0287058; 8.3 exhange with S and D about Leaflets.pdf; FW: World Economic Forum - enquiry CCM:0287056; 9.1 World Economic Forum - enquiry.pdf; 9.2 World Economic Forum attachment.pdf; 9.3 Logged correspondence with World Economic Forum.docx; 9.3 Logged correspondence with World Economic Forum.pdf; 9.4.1 WEF UK Meeting budget 1.pdf; 9.4.2 WEF UK Meeting budget 2.pdf; 9.4.3 WEF UK Meeting budget 3.pdf; 9.4.4 WEF UK Meeting budget 4.pdf; 9.5.1 WEF venue cost confirmation.pdf; FW: AV/WIFI Costs; FW: Event enquiry - 17 May 2016; 9.5.2 WEF venue cost confirmation costs.pdf; FW: Costs for printing badges; 9.6 WEF printing badges costs.pdf; 9.7 WEF invoice comms.pdf

Dear [redacted]

**Our Ref: FOI 69/16**

Thank you for your request under the Freedom of Information Act 2000 dated 6 June 2016.

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

We sent a response to you on the 4 July but advised we were unable to respond fully at the time to question 6 (as seen below): copies of correspondence with all foreign bodies unable to register as participants in the referendum who you believe to be taking part. This was due to a delay in our internal processes. We are now able to provide you with a response.

Your request is in bold below followed by our response.

You have requested:

**The media have revealed that so far several thousand polling cards have been issued to EU citizens from other EU countries (excluding Ireland)**
**who are not entitled to vote.**

**Kindly supply details of ;**

**6) copies of correspondence with all foreign bodies unable to register as participants in the referendum who you believe to be taking part**

The Commission does hold information related to your request.

Part of the information we hold that you requested has previously been released in a freedom of information request on the 12 May. The requested information at the time included:

**What steps is the Commission taking to ensure groups within the European Parliament are aware that non-UK funds may not be spent on referendum information?**

**Has the Commission been in touch with these groups to explain that non UK funds may not be spent on referendum information in the relevant period. As such expenditure is allowed under EP rules they may not be aware of the restrictions imposed under PPERA.**

You can find the response here:
http://www.electoralcommission.org.uk/__data/assets/pdf_file/0005/212558/FOI-32-16-redacted-response-for-web.pdf

We also hold additional correspondence with organisations that did not meet the requirements for registration as a referendum campaigner. This information we have attached. This includes correspondence with the following organisations:

- Europe of Freedom and Direct Democracy
- French Socialist Party
- Embassy of Hungary
- International Monetary Fund
- Brussels and Europe Liberal Democrats
- Organisation for Economic Co-operation and Development
- Socialists and Democrats in the European Parliament
- World Economic Forum

Additionally we hold information on the company Ryanair. We released the findings of an assessment in a press release here: http://www.electoralcommission.org.uk/i-am-a/journalist/electoral-commission-media-centre/news-releases-donations/electoral-commission-statement-on-assessment-of-ryanair-spending-on-eu-referendum-campaigning?. The information we hold relates to a regulatory assessment conducted by the Commission. We consider this information exempt under section 30 and section 31.Section 30(1) (a) (i) and 31 (1) (g)

The Commission has a statutory function to conduct investigations into potential breaches of the reporting requirements in Political Parties, Elections and Referendums Act 2000 ("PPERA"). The information requested is held by the Commission in relation to an investigation into whether Ryanair committed an offence in relation to referendum campaigning spending in the EU Referendum.

As stated in our press release, our regulatory assessment considered whether Ryanair committed an offence under section 117 of PPERA. Section 117 sets out offences relating to unregistered referendum campaigners spending more than £10,000 on referendum campaigns in the referendum period.

Section 30(1) (a) (i) of the Freedom of Information Act 2000 (FOI) provides for exemption from disclosure of information 0077hich has been held at any time by a public authority for the purpose of any investigation which the authority has a duty to conduct with a view to it being ascertained whether a person should be charged with an offence. The section 30 exemption applies to information that is held at any time, whether or not the investigation is on-going.

In this case it is necessary to consider the failure to comply in order to reach a view whether a person or persons should be charged with a criminal offence.

Where there is not evidence of criminal activity, or in any event, the Commission may consider civil breaches. In so far as the investigation related to other potential breaches of PPERA, 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 any person has failed to comply with the law, as provided by s31 (2)(a) of the FOI Act. Section 31 applies only to the extent that the information is not exempt under section 30.

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 investigations such as in this matter.

This investigation is now closed. However, as noted above, the section 30 exemption applies to information that is held at any time, whether or not the investigation is on-going.

The Commission considers that the information you have requested is also exempt under s.31 (1)(a), prejudice to the prevention or detection or crime, and s.31(1)(b), prejudice to the apprehension or prosecution of offenders.

Applications of the section 30 and 31 exemption are both 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 inquiries as part of its investigation powers so that it can make regulatory decisions based on a firm factual basis and to gather such evidence and facts on a confidential basis. It is in the public interest to maintain this confidentiality, as it encourages the free and frank exchange of information from third parties to the Commission without which the Commission could not perform its statutory functions.

The Commission aims to be robust and fair in its regulatory decisions. We acknowledge that there is a legitimate public interest in carrying out investigations in an open and transparent way, and in promoting public understanding of the decisions we make 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.

In carrying out effective inquiries the Commission depends on being able to secure the co-operation of those individuals and entities from whom we seek information. Whilst the Commission has powers to require information, the co-operation of the regulated community and other enforcement agencies remains essential to our ability to conduct our statutory functions. As our investigations rely on gathering evidence from these organisations it is clearly in the public interest that we maintain their co-operation and avoid releasing information that could prevent exchange of relevant information in the future and have the effect of hindering our ability to conduct our statutory functions.

Those individuals and entities had and continue to have a reasonable expectation that information provided in the course of the investigation would not be made available to the public at large. If information provided in the course of our investigation was made public under the Act, it would make individuals and entities reluctant to co-operate and may prejudice interactions with them as well as others in the future. This would in turn impact on the type, timeliness, and quality of information provided to the Commission during its investigations which would prejudice the Commission's ability to conduct its statutory functions. The fact that the investigation has been closed does not affect the relevance of this.

Having carefully weighed the public interest relating to possible disclosure of the information requested under Sections 30(1) (a) (i), 31 (1) (g), 31(1)(a) and 31(1)(b), 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.

Some of the information contained in these documents contains personal data, such as direct contact information of staff members and the names and contact details of junior staff members, which is exempt under Section 40 of the FOI Act. These documents have been redacted prior to release. Further explanation of the exemption is provided below.

Section 40(2) and (3)(a)(i) of the FOI Act

Section 40 (2) provides for an exemption where the information requested constitutes personal data, some of which is sensitive personal data, as defined by the Data Protection Act (DPA), and where release of the information requested would breach one of the data protection principles. Some of the information we hold within the description of personal data as defined by section 1 of the DPA because the information relates directly to an identifiable living individual.

**7) details of the sanctions open to you against those bodies in 6 above who you believe to spend more than £10k.**

The Commission has published guidance for campaigners covering the list of individuals and organisations that are able to register and the list of individuals and organisations that are permissible donors at the EU Referendum. Our guidance is available here: http://www.electoralcommission.org.uk/i-am-a/party-or-campaigner/campaigners-in-referendums

The Commission has no regulatory remit in relation to non-UK entities. However, we could, where we deemed it appropriate to do so, contact non-UK bodies, to advise them of the controls on spending in the referendum. We also monitored campaign activity throughout the campaign and will take appropriate action if we identify any campaign activity that we consider may contravene the rules. Further information regarding our role as a regulator can be found here: http://www.electoralcommission.org.uk/our-work/roles-and-responsibilities/our-role-as-regulator-of-political-party-finances/sanctions

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: 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: http://www.ico.gov.uk

Yours sincerely

**Paul O'Malley**
**Information Adviser (Records Management)**
The Electoral Commission
3 Bunhill Row

London EC1Y 8YZ
Tel: 020 7271 0[redacted]
Fax: 020 7271 0665
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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The Electoral Commission

Nicola Bonucci
Director and Accession Co-ordinator
OECD
2 rue Andre-Pascal
75775 Paris CEDEX 16
FRANCE

10 June 2016

Dear Sir

We acknowledge receipt of your correspondence dated 6 June 2016 and note your status as an intergovernmental organisation and your remit as outlined in your letter. In view of your status, we would expect you to comply voluntarily with the rules in any activities you undertake in the lead up to the referendum. That would be consistent with other comparable bodies who have or are inter-acting with matters relevant and potentially of influence on UK voters in the referendum.

Referendum spending is expenditure on certain campaigning activities that are intended to, or are otherwise in connection with, promoting or bringing about a particular outcome in the referendum, included in this are events such as that held at LSE and the production of reports that favour one outcome over another. There is an exclusion from the spending rules in respect of any property, services or facilities so far as those expenses fall to be met out of public funds. Staff costs also do not count towards any spending limit. We would reiterate that we expect that the cost of producing your report and the event either remained under the £10,000 threshold for registration or were subject to the exclusion from the spending rules relating to payments made out of public funds.

You will no doubt be aware that the section 125 of the Political parties, Elections and Referendums Act 2000 has placed restrictions on what governments can publish in the 28 days leading up to the referendum. We trust in the circumstances that you will comply with the intent of the legislation in the lead up to the referendum.'

Kindly confirm to us how the OECD will be proceeding. In view of the proximity of referendum polling day and current voting by post (which the UK system permits as of right), we would be grateful for your response by midday Tuesday 14 June.

The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

Tel: 020 7271 0500
Fax: 020 7271 0505
info@electoralcommission.org.uk
www.electoralcommission.org.uk



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POSITIVE ABOUT DISABLED PEOPLE

The Electoral Commission

I hope the above is helpful to you. If you require any additional information, please contact me on [redacted]@electoralcommission.org.uk or 020 7271 [redacted] or Victoria Fox at [redacted]@electoralcommission.org.uk or 020 7271 [redacted]

Yours sincerely

[redacted]

**Bob Posner**
**Director of Party and Election Finance & Legal Counsel**

**The Director**
LEGAL DIRECTORATE

Mr Bob Posner
Director of Party and Election Finance & Legal Counsel
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
United Kingdom

6 June 2016

Dear Mr Posner,

Thank you for your letter dated 18 May 2016 regarding the lecture by the OECD Secretary-General at the London School of Economics and Political Science on 27 April and the related report.

The OECD is an intergovernmental organisation with 34 member countries, including the United Kingdom, whose mandate is to provide analysis and views on a wide range of issues related to the economic situation of its Members as well as the global economy. Accordingly, like other intergovernmental organisations, the OECD cannot be considered to be campaigning in the context of the United Kingdom referendum on its membership of the European Union. In delivering the lecture and report, the OECD was fulfilling its mission as agreed by its Member countries, as it has been for more than 50 years.

Yours sincerely,

[redacted]

Nicola Bonucci
Director & Accession Coordinator
Directorate for Legal Affairs

cc: H.E. Mr Christopher Sharrock, UK Ambassador to the OECD

Direct line
Tel.: [redacted]
Fax. : [redacted]

www.oecd.org
ORGANISATION FOR ECONOMIC
CO-OPERATION AND DEVELOPMENT

2, rue André-Pascal
75775 Paris CEDEX 16
France

The Electoral Commission

Nicola Bonucci
Director and Accession Co-ordinator
OECD
2 rue Andre-Pascal
75775 Paris CEDEX 16
FRANCE

10 June 2016

Dear Sir

We acknowledge receipt of your correspondence dated 6 June 2016 and note your status as an intergovernmental organisation and your remit as outlined in your letter. In view of your status, we would expect you to comply voluntarily with the rules in any activities you undertake in the lead up to the referendum. That would be consistent with other comparable bodies who have or are inter-acting with matters relevant and potentially of influence on UK voters in the referendum.

Referendum spending is expenditure on certain campaigning activities that are intended to, or are otherwise in connection with, promoting or bringing about a particular outcome in the referendum, included in this are events such as that held at LSE and the production of reports that favour one outcome over another. There is an exclusion from the spending rules in respect of any property, services or facilities so far as those expenses fall to be met out of public funds. Staff costs also do not count towards any spending limit. We would reiterate that we expect that the cost of producing your report and the event either remained under the £10,000 threshold for registration or were subject to the exclusion from the spending rules relating to payments made out of public funds.

You will no doubt be aware that the section 125 of the Political parties, Elections and Referendums Act 2000 has placed restrictions on what governments can publish in the 28 days leading up to the referendum. We trust in the circumstances that you will comply with the intent of the legislation in the lead up to the referendum.'

Kindly confirm to us how the OECD will be proceeding. In view of the proximity of referendum polling day and current voting by post (which the UK system permits as of right), we would be grateful for your response by midday Tuesday 14 June.

The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

Tel: 020 7271 0500
Fax: 020 7271 0505
info@electoralcommission.org.uk
www.electoralcommission.org.uk



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POSITIVE ABOUT DISABLED PEOPLE

The Electoral Commission

I hope the above is helpful to you. If you require any additional information, please contact me on [redacted]

Yours sincerely



**Bob Posner**
**Director of Party and Election Finance & Legal Counsel**

---------- Original Message ----------
**From:** PEF Inbox
**Received:** 09/05/2016 15:56
**To:** Derek Vaughan MEP
**Subject:** Campaigning at the referendum on the UK's membership of the European Union

[redacted]

Dear Mr Vaughan,

## Rules on campaigning at the referendum on the UK's membership of the European Union

The Electoral Commission is an independent organisation set up by the UK Parliament. Our role includes monitoring and ensuring compliance with the rules on campaign spending at referendums.

We are aware that you are campaigning in the run-up to the EU referendum. I am writing to help you understand the rules on referendum campaigning, and how they may affect you and organisations you are involved with.

In the run up to a referendum, there is a formal campaigning period called the 'referendum period', during which the referendum campaign rules apply. The referendum period began on 15 April 2016 and ends on polling day. The rules apply to spending on certain campaigning activities that are intended to promote or bring about a particular outcome in the referendum – see our guidance for more details.

You cannot spend more than £10,000 on campaigning for an outcome without registering with us. This includes spending incurred before the referendum period begins, if the campaigning itself takes place during the referendum period – for example leaflets which were printed before the referendum period but distributed during it. See page 7 of this guidance for a list of organisations and individuals who are eligible to register as a campaigner.

Once registered, campaigners are also subject to rules over the donations and loans they receive – see this guidance for more details.

From the leaflets we have seen it seems that the spending may have been incurred by the S&D Group in the European Parliament, although your details also appear, as well as the branding of the European Parliamentary Labour Party.

Since the S&D Group is not a UK-based organisation, it is unable to register as a campaigner. This means that the S&D Group must not spend over £10,000 on campaigning during the

referendum period, including on material produced before the referendum period but used during it.

Could you please confirm:

a) which organisation or individual is responsible for the spending; and
b) how much money has been spent on activities promoting an outcome taking place during the referendum period.

I would be grateful if you would let us know the answers to these questions by 3pm on Monday 16 May 2016. If have any queries, or if you would like more time to produce the answers, please get in touch on 0333 103 1928 or at pef@electoralcommission.org.uk.

Kind regards,

[redacted]
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
[redacted]
Fax: 020 7271 0505
www.electoralcommission.org.uk

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---------- Original Message ----------
**From:** PEF Inbox
**Received:** 12/05/2016 15:43
**To:** [redacted]
**Subject:** S&D Group leaflet CCM:0237087

[redacted]

Dear [redacted],

Thank you for your call earlier concerning the leaflets which prompted us to contact Derek Vaughan MEP.

I attach a picture of the leaflet we discussed. As I said on the phone, the imprint says that the leaflets were printed in October 2015. However, we have received information that suggests that this particular leaflet appears to have been distributed by hand more recently.

Can you please confirm, providing evidence if possible:

- who paid for the leaflets;
- how much they cost;
- the geographical area in which the leaflets were distributed;
- by whom (organisation or individual) the leaflets were distributed;
- when the leaflets were distributed;
- and in particular how many leaflets were distributed in the referendum period which began on 15 April 2016.

I would be grateful if you could provide this information by next Thursday, although I know you said you will be out of the office for some days now. If you would like more time, or if you have any questions, please get back in touch.

Kind regards,

[redacted]
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
[redacted]
Fax: 020 7271 0505
www.electoralcommission.org.uk

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[redacted] Sorry I missed you!

A strong voice for

Wales in Europe [redacted]



# Derek Vaughan MEP

***Labour's Member of the European Parliament for Wales***


4th Floor, Transport House, 1 Cathedral Road, Cardiff, CF11 9SD

derek.vaughan@europarl.europa.eu

www.derekvaughanmep.org.uk


**Labour in Europe**

European Parliamentary Labour Party

S&D

Group of the Progressive Alliance of

Socialists & Democrats

in the European Parliament


*Printed by 4 Colour Digital Ltd, Unit 8, Sandfields Business Centre, Purcell Avenue, Port Talbot, SA12 7PT. Produced in October 2015 with the use of European Parliament Information Money (400) by the European Parliamentary Labour Party/S&D Group in the European Parliament, Europe House, 32 Smith Square, London, SW1P 3EU.*

# WHAT THE EUROPEAN UNION DOES FOR WALES

## 1. Creates jobs and growth

*The EU is the **biggest single market in the world**, allowing Welsh businesses to trade widely and access better supply chains. Almost half of the UK's trade and foreign investment comes from the EU, accounting for **3.5 million UK jobs**.*

## 2. Defends your rights

*EU action has helped tackle **discrimination at work**, ensured **health and safety** standards and secured better **holiday, maternity and paternity rights** for workers. Thanks to the EU, **disabled and LGBTI rights** have been enshrined and **consumers are protected** when buying goods and services.*

## 3. Protects the natural environment and ensures your food is safe

*The EU has been at the forefront of the **global fight against climate change**. EU policies have **improved the quality of Wales's air, beaches, bathing waters and natural habitats**. EU law means you can have **confidence in the food you buy** – ensuring packaging includes nutrition, allergen and origin information.*

## 4. Keeps you safe

*European cooperation helps us tackle* **terrorism**, **trafficking** *and* **cybercrime**. *The* **European Arrest Warrant** *ensures that criminals are brought to justice.*

## 5. Invests in the future

*The EU provides funding for major projects across Wales, including **improvements to regional infrastructure** and the **regeneration of deprived areas**. EU investment in **scientific research and development** is helping to create the industries and jobs of the future as well as supporting key medical and technological breakthroughs.*

---------- Original Message ----------
**From:** PEF Inbox
**Received:** 15/06/2016 16:37
**To:** [redacted]
**Subject:** RE: EU referendum leaflet

[redacted]

Dear [redacted],

Thank you for your quick response.

Best wishes,

[redacted]
**Guidance Adviser**
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
[redacted]
Fax: 020 7271 0505
www.electoralcommission.org.uk

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image001.jpg

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---

**From:** [redacted]

**Sent:** 15 June 2016 16:34
**To:** PEF Inbox
**Subject:** RE: EU referendum leaflet

Dear [redacted]

Thank you for your email.

The British Delegation of the S&D Group has not produced any materials referencing the referendum or advocating a vote to remain in the EU. However, given that the Electoral Commission is taking a very broad assessment with regards to what would constitute campaign material, I have included below the costs of anything that we have funded that could conceivably be distributed/have been distributed during the referendum campaign period.

These materials are not necessarily similar in nature to the South West leaflets, but for the sake of completeness I have included the cost of all and any materials that could conceivably be considered to be relevant to the referendum and that could potentially be distributed during the referendum campaign.

As discussed on the phone, it is very likely that the costs of materials distributed during the referendum period will be lower than the figures below, as not all the leaflets will have been distributed during the referendum period. However, since even these figures are well below the £10,000 threshold, it seems easiest to give the totals for the full cost of production of everything that has been produced:

Various leaflets for South West of England: £1797
Employment rights leaflets produced for use in Wales: £2894
Various MEP information leaflets for Yorkshire and the Humber: £1005

Total: £5696

I hope that this answers your questions. Please let me know if you have any further questions.

Kind regards

[redacted]

---

**From:** PEF Inbox [mailto:PEF@electoralcommission.org.uk]
**Sent:** 13 June 2016 16:36
**To:** [redacted]
**Subject:** RE: EU referendum leaflet

Dear [redacted],

Thank you for your email and your clarifications.

Can you please confirm where else in the UK and Gibraltar the British Delegation of the S&D Group has sent out similar leaflets that could have been distributed in the regulated period, and how much they cost?

Kind regards,

[redacted]

[redacted]
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
Tel: [redacted]
Fax: 020 7271 0505
www.electoralcommission.org.uk

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**From:** [redacted]
**Sent:** 10 June 2016 12:39
**To:** PEF Inbox; [redacted]
**Subject:** RE: EU referendum leaflet

Dear Sam

Many thanks for your email concerning information leaflets promoting Clare Moody MEP in Dorset.

The leaflet was funded by the British Delegation of the S&D Group in the European Parliament (also known as the European Parliamentary Labour Party).

Similar leaflets were produced for other parts of the South West region.

The leaflets were not produced specifically for the referendum and are intended to have a longer lifespan than the referendum period. Some were distributed before the start of the official campaign period and not all the leaflets have been distributed.

However, for the sake of completeness, the full figure for the production of these leaflets that could potentially have been distributed during the referendum period is £1,797.

I can also confirm that our total expenditure as an organisation on these and any other materials used in the UK and Gibraltar during the referendum period will be below the £10,000 campaign spending threshold.

If you have any further questions please do not hesitate to contact me.

Yours sincerely

[redacted]
European Parliamentary Labour Party
British Delegation of the S&D Group in the European Parliament

---

**From:** PEF Inbox [PEF@electoralcommission.org.uk]
**Sent:** Wednesday 8 June 2016 10:36
**To:** [redacted]
**Subject:** EU referendum leaflet

Dear [redacted]

We have been made aware of the attached leaflet which was handed out by Labour activists on 4 June 2016.

The imprint states that the leaflets were printed in April. As you are aware, the period during which spending on referendum material is regulated began on 15 April 2016. Irrespective of when they were printed, any leaflets used during the regulated period will fall under the spending rules (see guidance for more details).

Can you please confirm:

- how much money was spent on the leaflets;
- how many of the leaflets have been or will be distributed during the regulated period;
- which individual or organisation is responsible for the spending; and
- whether there are other similar leaflets for other areas in the South West or elsewhere in the UK or Gibraltar, and if so how much money was spent on those.

It would be helpful if you could let us know the answers as soon as possible.

Kind regards,

[redacted]
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
[redacted]
Fax: 020 7271 0505
www.electoralcommission.org.uk

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image001.jpg

---------- Original Message ----------
**From:** [redacted]
**Received:** 27/04/2016 11:44
**To:** [redacted]
**Subject:** FW: World Economic Forum - enquiry

[redacted]

Dear [redacted]

Thanks for this information.

Any individual or organisation can spend up to £10,000 on referendum spending. You must not spend more than £10,000 on referendum spending during the referendum period unless you have registered with us as a 'registered campaigner'. If you do, you may commit an offence. Our guidance explains who can register and how to register. If you are a Swiss registered organisation you are not eligible to register with us.

Before the referendum, there is a formal campaigning period called the 'referendum period.' During this period, there are rules and spending limits that apply to certain activities. The referendum period started on 15 April 2016 and ends on 23 June 2016.

Referendum spending is expenditure on certain campaigning activities that are intended to or are otherwise in connection with, promoting or bringing about a particular outcome in the referendum.

Spending on events that are intended to, or are otherwise in connection with, promoting or bringing about a particular outcome in the referendum will be referendum spending. So if your organisation holds an event that invites a politician or business or sector leader that supports one side of the outcome to speak about the referendum and the impact of the vote, this is highly likely to be regulated activity. David Cameron is, of course, a very prominent supporter of a Remain outcome. Less likely to be regulated is an event that offers equal time to speakers of similar stature.

You should also think about the audience of the event. Events for discussion with fellow businesses and academics are less likely to be regulated. However, if this is available to the wider public, by webcast or video, this is more likely to be regulated given its availability to voters.

I hope this is helpful. If we can be of any further assistance, please don't hesitate to contact us on pef@electoralcommission.org.uk, or by phone on 0333 103 1928.

Kind regards,
[redacted]

[redacted]
The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ
[redacted]
Fax: 020 7271 0665
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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---

**From:** [redacted]
**Sent:** 26 April 2016 11:27
**To:** [redacted]
**Cc:** [redacted]
**Subject:** RE: World Economic Forum - enquiry
**Importance:** High

Dear [redacted],

Many thanks for your email.

The audience will be primarily UK business (top level CEO's) as well as leaders of global companies, there will also be representatives of youth communities of the Forum and the total number of participants will be 160 people.

Media options are being decided at the moment whether it is webcast or filmed, could you please let me know the implications of each ?

Many thanks for your help,
Kind regards,
[redacted]

[redacted]
Europe and Eurasia Team

**World Economic Forum**
91-93 Route de la Capite, Cologny Geneva CH1223 Switzerland
[redacted]


cid:image001.jpg@01CDB8E6.AFBA8D80

**From:** [redacted]
**Sent:** 26 April 2016 12:13
**To:** [redacted]
**Subject:** FW: World Economic Forum - enquiry

Dear [redacted],

Thanks for your email. Sorry for the delay in responding.

I have had a look at the information you have sent over. I would be grateful for some more details about the intended audience for the session – those in the room (will this be primarily UK businesses, or a more international audience) - and whether this will be made more widely available (for example, by streaming the session or making video, transcripts available on your website, etc.). Will media be in attendance?

I am in and out of the office today, but if you can provide some more information by email I will compile some advice for you shortly.

Kind regards,
[redacted]

---

**From:** [redacted]
**Sent:** 26 April 2016 08:57
**To:** [redacted]
**Subject:** RE: World Economic Forum - enquiry

Dear [redacted],

Can you please let me know which time is suitable for me to contact you today ?

With thanks and kind regards,
[redacted]

---

**From:** [redacted]
**Sent:** 22 April 2016 13:38
**To:** [redacted]
**Subject:** RE: World Economic Forum - enquiry

Dear [redacted],

Many thanks for your email, please find attached our 2 pager with further information about our event.

In advance thanks for letting me know your comments at your earliest convenience!

With thanks and kind regards,
[redacted]

[redacted]
Europe and Eurasia Team

**World Economic Forum**
91-93 Route de la Capite, Cologny Geneva CH1223 Switzerland
[redacted]

cid:image001.jpg@01CDB8E6.AFBA8D80

---

**From:** [redacted]
**Sent:** 21 April 2016 18:22
**To:** [redacted]
**Subject:** FW: World Economic Forum - enquiry

Dear [redacted]

Thanks for your email.

I'm not sure who you spoke to earlier – I'm sorry if you'll be repeating yourself, but the implications will very much depend on the specifics of the event. Can you give me some more details about the event (theme, format etc.), or give me a call on Friday to discuss this further?

Kind regards,
[redacted]

[redacted]
The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ
[redacted]
Fax: 020 7271 0665
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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---

**From:** [redacted]
**Sent:** 21 April 2016 10:03
**To:** infoengland
**Subject:** World Economic Forum - enquiry
**Importance:** High

Dear Sir,

Many thanks for our call this morning, as discussed, we are hosting an event in London in May with senior cabinet ministers.

Could you kindly inform me what the implications are for our event, should there be any.

With thanks and kind regards,

[redacted]

[redacted]
Europe and Eurasia Team

**World Economic Forum**
91-93 Route de la Capite, Cologny Geneva CH1223 Switzerland
[redacted]


cid:image001.jpg@01CDB8E6.AFBA8D80

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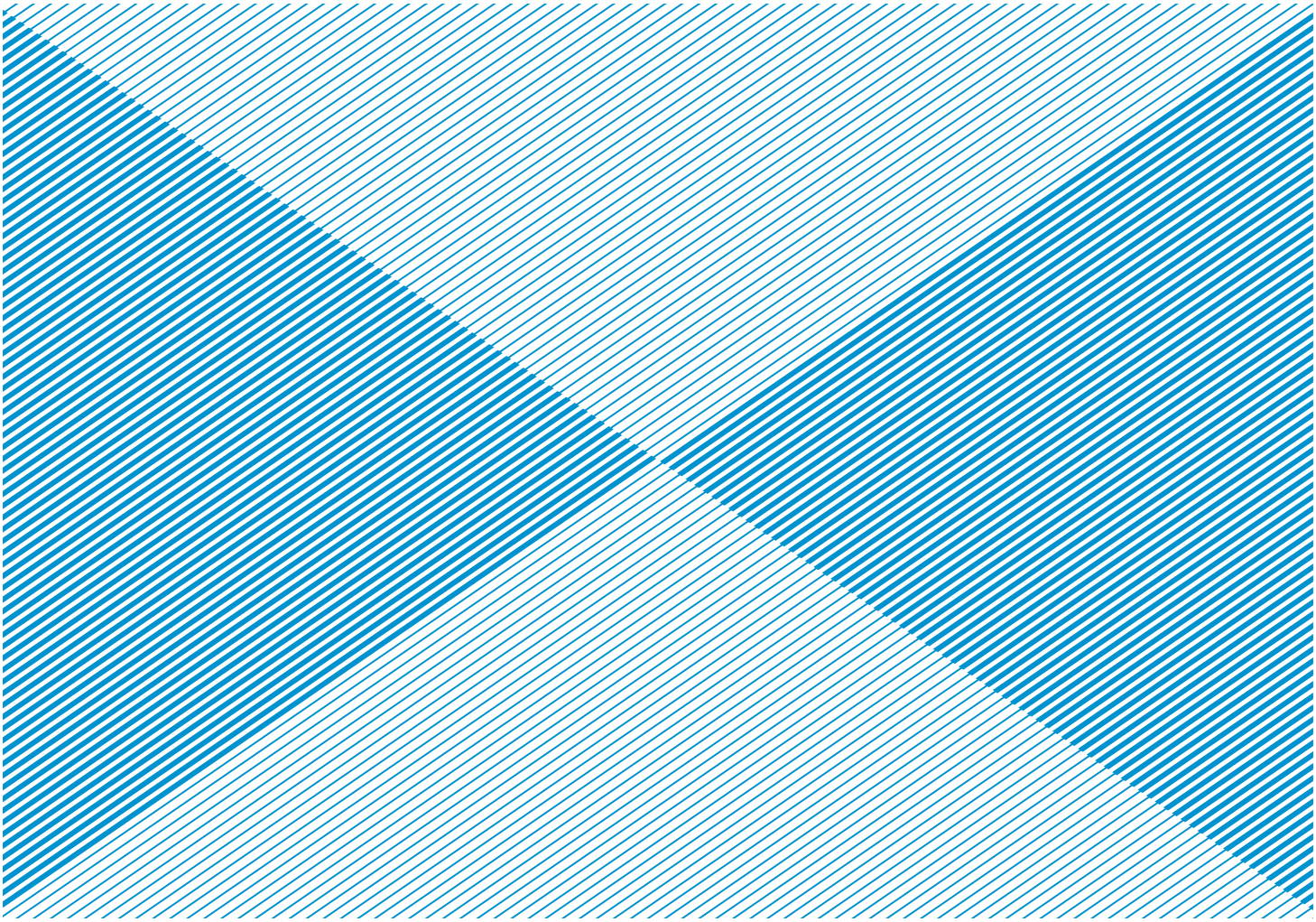
WORLD ECONOMIC FORUM

COMMITTED TO IMPROVING THE STATE OF THE WORLD

Meeting Overview

# World Economic Forum
## Britain in the World

London, United Kingdom 17 May 2016



# Context

The United Kingdom, the world's fifth-largest economy, stands on the threshold of what its prime minister described in Davos in January as "a generational question". That question is its relationship with Europe and with the wider world. The country has historically played a global role, occupies a significant place in global decision-making and has been a guarantor of European peace and prosperity. Prime Minister David Cameron has made the case for a competitive, flexible Europe where members can prosper inside and outside the Eurozone. That case will be put to UK voters in a referendum on 23 June.

The 2015 general election reaffirmed the UK government's policy of reconciling fiscal discipline with a renewed emphasis on growth. The country has been singled out by the International Monetary Fund as "leading in a very eloquent and convincing way in the European Union". That leadership has provided an important voice for the competitiveness agenda in the European Union. It is an economy where "clearly growth is improving, the deficit has been reduced and where the unemployment is going down."

As UK Conservatives now govern with a single party mandate for the first time in nearly 20 years, this meeting provides the opportunity to engage directly with Senior Cabinet Ministers of the UK Government.

How will Britain's relationship with Europe and the wider world change after the referendum? What are the implications for business and society, and for the country's future as a financial capital and leading provider of services?

# Meeting Objectives

The interaction with Prime Minister Cameron forms part of the World Economic Forum National Strategy Series in selected countries that have proven to be strong influencers of the economic growth and the political agenda of a region.

The informal and interactive discussion with one of today's key political leaders and his cabinet will provide an opportunity for participants to explore the UK's central role in the region, gain valuable insight and reflect on the policy agenda of the UK and the European Union.

# Target Audience

As part of the World Economic Forum's regional programme on Europe, this meeting will convene 150 constituents, including 100 CEOs from the Forum's Partner and Member companies and 50 participants from other communities, primarily drawn from its Global Shapers, Young Global Leaders and Social Entrepreneurs communities.

# Meeting Agenda

**Tuesday 17 May**

| | |
|---|---|
| 10.00 | Registration Opens |
| 10.30 - 11.00 | Opening and Introductory Remarks by Professor Klaus Schwab |
| 11.00 - 12.00 | Speech and Q&A with Senior Cabinet Minister |
| 12.00 - 12.30 | Informal Networking |
| 12.30 - 14.00 | Lunch Discussion with Ministerial Table Hosts |
| 14.00 - 14.55 | Interactive Discussion with Senior Cabinet Minister |
| 14.55 - 15.00 | Closing |

# FAQ

Where will the meeting take place?
The meeting will take place in London, United Kingdom. More details on the exact location will be available closer to the date.

What does registration include?
There is no participation fee for the meeting. Participants must cover the cost of their travel and accommodation and organize their own airport transfer.

What is the working language of the meeting?
The official language of the meeting is English. Please note that interpretation will not be available.

When do I need to register?
You are encouraged to register as soon as possible. Registrations will be taken on a first-come, first-served basis. You will be alerted if you are registering after all places are filled, and we will keep you informed of the meeting status should you wish to be placed on the waiting list.

Do I need a visa?
For visa requirements, please check with your nearest UK embassy or consulate.

Who do I contact for more information?
Lucy Smith, World Economic Forum
Tel.: +41 (0)79 949 4701
Email: ukmeeting@weforum.org

WORLD ECONOMIC FORUM

COMMITTED TO IMPROVING THE STATE OF THE WORLD

The World Economic Forum, committed to improving the state of the world, is the International Organization for Public-Private Cooperation.

The Forum engages the foremost political, business and other leaders of society to shape global, regional and industry agendas.

World Economic Forum
91–93 route de la Capite
CH-1223 Cologny/Geneva
Switzerland

Tel.: +41 (0) 22 869 1212
Fax: +41 (0) 22 786 2744

contact@weforum.org
www.weforum.org

## Logged correspondence with World Economic Forum

**Date received**: 27/04/2016

**Actioned date**: 27/04/2016

**Channel**: Call

**Query:**

Asked if referendum spending covers spending outside of the UK? Whether staff costs are included as referendum spending? Could we send her our enforcement policy.

**Response:**

Advised that referendum spending can be spending outside of the UK. Referred to the definition of referendum spending in the guidance. If the staff member has a direct contract with the employer, staff costs do not count as referendum costs. Sent the below email:

Hi [redacted]

As discussed, further information on what is and isn't referendum spending can be found on pages 6-8 of our spending guidance.

Our enforcement policy can be found here. Further information on our role as a regulator can be found here.

I hope the above is helpful to you. If you have any further questions, please do not hesitate to contact the party and election finance advice line on 0333 103 1928 or e-mail the party and election finance inbox at pef@electoralcommission.org.uk .

Kind regards

[redacted]
[redacted]
Party and Election Finance
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
Tel: [redacted]

**Date received**: 29/04/2016

**Actioned date**: 29/04/2016

**Channel**: Call

**Query:**

Asked about the organisation of a balanced event, one where there is a speaker representing both sides. Would this be referendum spending? Could she meet with the Commission to discuss the WEF's event in May.

**Response:**

If you hold an event where you invite speakers to represent both sides of the outcome and allow all those attending an equal opportunity to participate, so that the event is not intended to promote or otherwise bring about a particular outcome, then your spending on the event is unlikely to be referendum spending. Yes, can arrange to meet with the Commission. Will follow up with my colleagues and confirm via email.

**Date received**: 04/05/2016
**Actioned date**: 05/05/2016
**Channel**: Email
**Query:**
Hi [redacted]

Following our call today, please find attached our budget with the detailed amounts.

A few questions that we have :

- Is the cost of media expenditures by the UK Government considered as Referendum Spending (yet to be confirmed)
- Is the limit of £10'000 including or excluding VAT ?
- Still to be included is cost for potential lighting and backdrop

Do you foresee any other costs that we may have missed out ?

Thanks for letting me know your thoughts and for your help !
Kind regards,
[redacted]

[redacted]

**Response:**

Dear [redacted]

Thank you for speaking to us yesterday and providing the budget for the World Economic Forum's event.

As we discussed, spending in respect of the referendum is regulated if it is incurred in connection with promoting or procuring a particular outcome in the referendum. Having only one side of the referendum debate represented and broadcasting the meeting would, in our view, make it highly likely this meeting would fall under the definition of referendum expenditure.

As we also discussed, the WEF cannot register as a permitted participant in the EU referendum. As such it may only spend up to £10,000 (including VAT) on referendum campaigning during the referendum period (which is running from 15 April to 23 June 2016). If any referendum spending is incurred by or on behalf of a body which is not a permitted participant and it exceeds the £10,000 threshold, any person who authorised the expenses in excess of the limit is guilty of an offence if they knew, or ought reasonably to have known, that the expenses were being incurred in excess of that limit. This means that if this situation occurred in respect of this meeting, individuals within the WEF may have committed criminal offences.

We can impose a variety of civil sanctions in such circumstances, including financial penalties, or seek a police investigation and potential prosecution. We are able to issue stop notices, which require by law that a particular action or intended action be stopped. This could, for example, prevent a meeting or other event going ahead if this would prevent a breach of the £10,000 threshold.

We discussed that you intend to comply with the law on referendum expenses, and that you have three options open: make the event neutral (so that it is not referendum campaigning), bring the costs under £10,000, or make the meeting a closed event.

If you would prefer that the meeting does not fall under the definition of regulated referendum expenditure, you would need to ensure that the content of the meeting remains entirely impartial and does not advocate any particular outcome. For example, any 'Leave' campaigner who responds to your invitation to should also be senior and speak at equal length to advocate the alternative outcome. Additionally, any communications or other material, whether it is given by other speakers, given out or on display at the meeting or used to promote the meeting, should be neutral. It should not offer a viewpoint on the referendum or promote a particular outcome.

In respect of bringing the costs under £10,000, I would advise that the regulated spending would include all the listed items in the document you attached to your email, including the costs associated with lighting and the backdrop. We provide a list of what spending does and does not count towards the spending limit on pages 6-8 of our Spending for EU referendum campaigners guidance. The EU referendum spending rules do not cover spending that is met out of public funds; so any expenditure incurred by the UK Government would not count towards your spending limit.

The third option is that you may want to consider whether you make the event closed, in order that it cannot affect voters in the referendum.

I understand you are waiting to hear from the Leave campaign as to whether a suitable speaker can be identified. Please keep us updated with your plans. We will need to be satisfied that the event complies with the rules and we can offer continued assistance to ensure that is the case.

Yours sincerely,

**Date received**: 09/05/2016

**Actioned date**: 09/05/2016

**Channel**: Email

**Query:**

Dear [redacted]

Could you please see the below questions and let me know your thoughts this morning ?

- Do the costs incurred by our international staff in setting up the event contribute (or not) to the £10k?
- If we have a representative from the leave campaign for the speech, which is mediatised, do we also need equal participation from each campaign side for a roundtable discussion, which does not include media?
- If we have someone from the leave campaign who is not a current Minister, will this still be on the right level, for example Stephen Parkinson or David Davis?

With thanks and kind regards,

[redacted]

**Response:**

H[redacted]

1. Regardless of the location of your staff, permanent, fixed term or temporary staff costs where the staff member has a direct contract with you will not count towards your spending limit. Further information can be found on page 10 of our spending guidance.

2&3. If you are planning the event to fall outside of the referendum spending rules, the event must remain neutral and objective in all aspects of the event. This includes the promotional material, media handling, guest speakers, participation and the overall tone of the event. The leave and remain speakers must receive equal time and opportunity for the audience to participate and be presented objectively within the sessions. You would need to have equal representation in the roundtable discussion and the guest speaker would need to be of a similar profile and prominence as Mr David Cameron. As a former Cabinet Minister with a high profile, Mr David Davis is likely to provide equal representation. If the event is structured and presented in a neutral and objective way, and does not make a value judgement towards a particular outcome, it is unlikely to fall within the spending rules.

From these questions we understand that you have still not finalised whether you are planning to make the event a neutral one, or bring the costs under £10,000. Clearly this is of concern to us, because the event would not, on current plans, comply with the spending rules. While we appreciate that you are engaging with us taking steps to bring the event in line with the rules, the event is only a week away and we are still not clear on the direction the World Economic Forum are taking on this.

Please therefore confirm by 1 pm tomorrow – 10 May 2016 – how you intend to ensure that this event complies with the referendum campaigning rules, as set out in PPERA and the EU Referendum Act 2015.

We will need details and evidence to demonstrate that it will comply. For example, if you decide that the event will not exceed the £10,000 spending limit, we require further evidence on the budget which includes the lighting/backdrop as well as the recording/live stream of the event, if this goes ahead. If you decide that the events cost will not fall under the definition of regulated referendum expenditure, you would need to ensure that the content of the meeting remains entirely impartial and does not advocate any particular outcome. We would require evidence of the event timetable, promotional or other event related material and information on the speakers for the event.

If we are not satisfied with the evidence provided, we will consider whether we need to take action, which may include preventing the meeting from taking place.

If you require further information or if you would like to discuss, please don't hesitate to contact me.

Kind regards

[redacted]
Party and Election Finance
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
[redacted]
Fax: 020 7271 0505
www.electoralcommission.org.uk

Make sure you are registered to vote

**Requester response:**
Dear [redacted]

As discussed, please find attached the budget overview for our event as well as various evidence email trails or price quotes.

Please let us know your thoughts and feedback at your earliest convenience or if you need any further information.

Thank you for your assistance.

With kind regards,
[redacted]

[redacted]

**Follow up response:**
Thanks [redacted]

I will follow up with my colleagues and I will be in touch this afternoon. I'll let you know of any feedback or guidance that we can provide.

Kind regards

[redacted]
[redacted]
Party and Election Finance
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
Tel: [redacted]

**Date received**: 11/05/2016
**Actioned date**: 11/05/2016
**Channel**: Email
**Query:**

Dear [redacted]

Thank you for being available at such short notice to discuss the budget. We felt the meeting was very productive and we are pleased that you have taken on board our comments.

Following on from our discussion, we note that you are making the following adjustments to bring your event costs below £10,000. We understand that the World Economic Forum;

- reduced the cost associated with the tablecloths by using less tables;
- has not incurred any costs associated with marketing or promoting the event (the costs marked 'n/a');
- will omit the cost of £60 associated with staff time, which is not regulated;
- has reduced the amount of lapel and roving microphones used
- will no longer provide Wi-Fi at the event
- will no longer hire the services of a photographer (photos will be taken by own employees)
- has reduced the costs associated with the catering;
- will not live stream the event online

We would be grateful if you could please confirm the above, to ensure that we have an accurate record for our files.

You also agreed to provide us with a revised budget which includes all costs both excluding and including VAT.

Finally, could you also please confirm that the UK Government is providing the videographer and technical equipment for recording David Cameron's speech, and that this is the only cost being met by the UK Government. Please also confirm your statement that this is a standard arrangement when the Prime Minister speaks.

If you have any questions or if you would like to discuss, please don't hesitate to contact me. We would be grateful for your confirmation on these points as soon as possible this evening or tomorrow, in order that we can then provide you with our definitive position on the event.

Kind regards

[redacted]
[redacted]
Party and Election Finance

The Electoral Commission
3 Bunhill Row

**Response:**

Dear [redacted]

Many thanks for your time yesterday, much appreciated.

In regards to the below points and as per your request, please note that we indeed confirm all of them

- reduced the cost associated with the tablecloths by using less tables;
- has not incurred any costs associated with marketing or promoting the event (the costs marked 'n/a');
- will omit the cost of £60 associated with staff time, which is not regulated;
- has reduced the amount of lapel and roving microphones used
- will no longer provide Wi-Fi at the event
- will no longer hire the services of a photographer (photos will be taken by own employees)
- has reduced the costs associated with the catering;
- will not live stream the event online

The broadcaster will be an invited media pool broadcaster who will pay their own costs, so this is at no expense to the UK government or us. In addition, the UK government will provide an official government photographer for PM events, and they will meet the associated costs for this, which is a standard arrangement for them.

Attached, please find the revised budget, please note the following points :

- there is no extra VAT on the room rental and technical equipment
- we have included 15 nameplates to the printed materials budget, this is for the speakers throughout the day

We have been approached by the City of London regarding invitations as they wish to "include up to half a dozen senior City of London members/officials". We would appreciate your guidance on this point, as these people are not part of our members. We will need to include an additional table should their participation be confirmed.

I look forward to hearing from you on the above.

With thanks and kind regards,
[redacted]

**Requester response:**
Hi [redacted]

Thank you for your confirmation on the below points and for providing us with a revised budget.

Your email raises two further points we require clarification on.

You stated that a 'media pool broadcaster' will be invited and who will pay their own costs. If the broadcaster is providing the World Economic Forum with a service free of charge, then

the associated cost would be classed as notional expenditure and would count towards the spending limit.

Can you therefore please explain the role of the broadcaster further. Specifically, we will need confirmation of whether the broadcaster will be providing a service to you at the event.

Additionally, you stated that the City of London have requested that some of their officials attend your event. If you proceed with this request, you will need to provide a revised budget to us which includes any costs associated with their attendance. As with your other guests, this may include costs associated with the additional table and any additional catering costs for example.

If you have any questions or if you would like to discuss, please don't hesitate to contact me.

Kind regards

[redacted]
[redacted]
Party and Election Finance

**Date received**: 11/05/2016

**Actioned date**: 12/05/2016

**Channel**: Email

**Query:**

Dear [redacted]

The broadcaster will not be invited from our side, but from the UK Government. The broadcaster would like to film the speech of the PM.

I was just told by our media team that we would also like to invite 20 media leaders from different media in the UK and Europe, only for the speech. This would not occur any additional cost for us, as they would not increase catering or any technical element. Do you see that this would increase the spending in any other way?

Best,

[redacted]

**Response:**

Thanks[redacted]

You are entitled to invite the media to your event as long as the costs associated do not bring the total costs over the £10,000 spending limit. You have advised that there would be no increase in costs associated with these individuals attending the speech.

If the 'media pool broadcaster' has been invited by the UK Government and the film is used for their or for the broadcaster's purposes only, then the costs would not fall under your spending limit. We would advise that you do not to use the film for your own purposes, such as by promoting or publishing the film on your website, as the associated costs may count towards your spending limit.

We are satisfied with the latest budget you have provided.

The only outstanding issue we have therefore is whether or not you intend to use the 'media pool broadcaster's film for your organisation's purposes.

Please confirm this point as soon as possible, and no later than 1 pm, UK time.

We should then be able to provide you with our position.

If you have any questions, please contact me by telephone on the number below or my colleague, [redacted]

Kind regards

**Requester response:**

Dear [redacted]

I can confirm that we will not post the film on our website.

Thank you for your acceptance of our budget. Could you send us a final confirmation of your acceptance of our budget/event?

Best,

[redacted]

**Follow up response:**
Dear [redacted]

Thank you for your providing us with your revised budget this morning as well as clarification on the broadcaster.

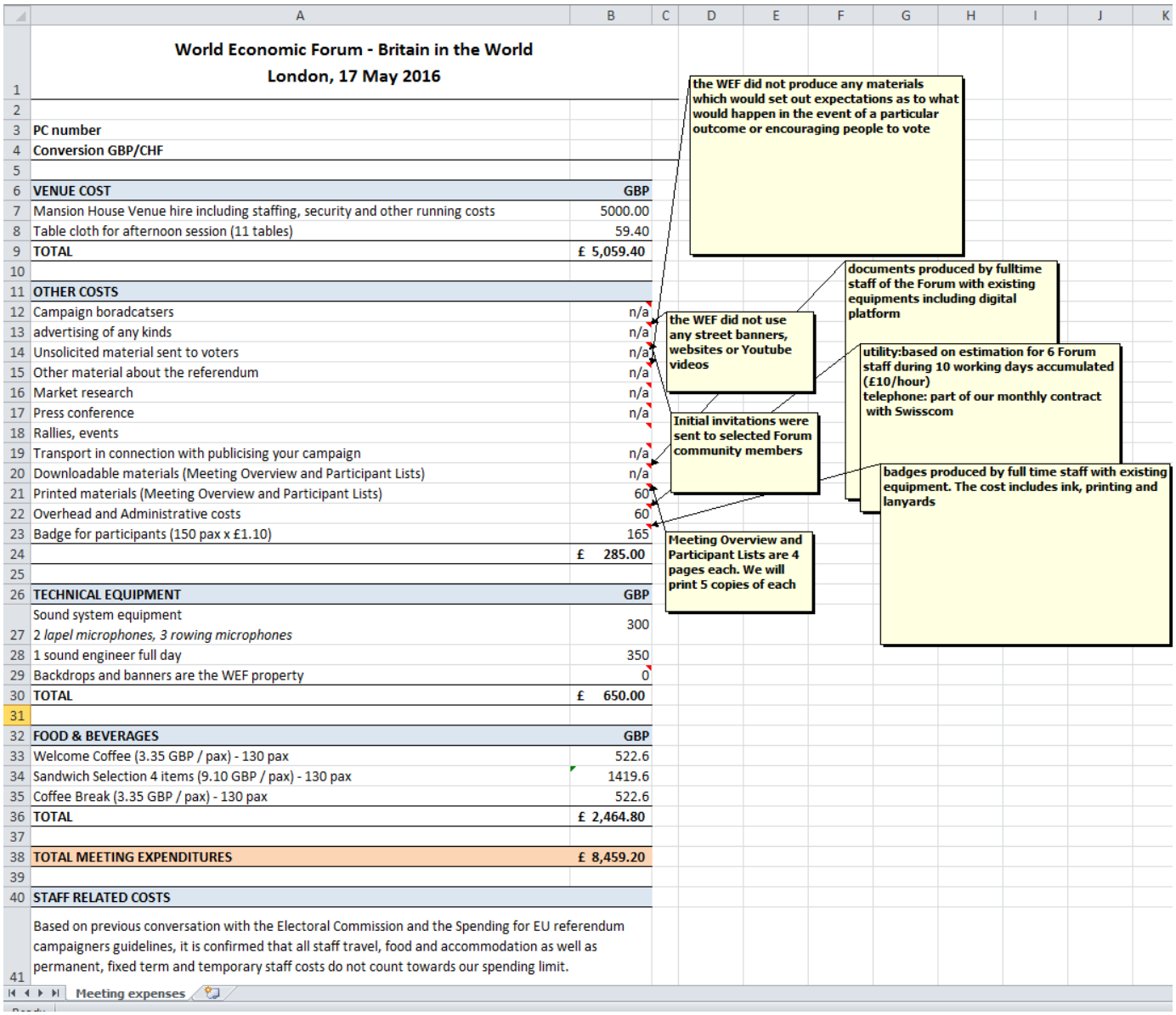
We can confirm that we are satisfied your organisation's event will not exceed £10,000 on the basis of the evidence supplied.

If there are any changes to the event arrangements, please update us immediately on how it may affect your budget. We will be including the event as part of our routine campaign monitoring ahead of the EU Referendum.

If you have any questions or if you would like to discuss, please don't hesitate to contact me.

Kind regards

[redacted]



| | A | B |
|---|---|---|
| 1 | **World Economic Forum - Britain in the World**<br>**London, 17 May 2016** | |
| 2 | | |
| 3 | **PC number** | |
| 4 | **Conversion GBP/CHF** | |
| 5 | | |
| 6 | **VENUE COST** | **GBP** |
| 7 | Mansion House Venue hire including staffing, security and other running costs | 5000.00 |
| 8 | Table cloth for afternoon session (11 tables) | 59.40 |
| 9 | **TOTAL** | **£ 5,059.40** |
| 10 | | |
| 11 | **OTHER COSTS** | |
| 12 | Campaign boradcatsers | n/a |
| 13 | advertising of any kinds | n/a |
| 14 | Unsolicited material sent to voters | n/a |
| 15 | Other material about the referendum | n/a |
| 16 | Market research | n/a |
| 17 | Press conference | n/a |
| 18 | Rallies, events | |
| 19 | Transport in connection with publicising your campaign | n/a |
| 20 | Downloadable materials (Meeting Overview and Participant Lists) | n/a |
| 21 | Printed materials (Meeting Overview and Participant Lists) | 60 |
| 22 | Overhead and Administrative costs | 60 |
| 23 | Badge for participants (150 pax x £1.10) | 165 |
| 24 | | **£ 285.00** |
| 25 | | |
| 26 | **TECHNICAL EQUIPMENT** | **GBP** |
| 27 | Sound system equipment<br>2 *lapel microphones, 3 rowing microphones* | 300 |
| 28 | 1 sound engineer full day | 350 |
| 29 | Backdrops and banners are the WEF property | 0 |
| 30 | **TOTAL** | **£ 650.00** |
| 31 | | |
| 32 | **FOOD & BEVERAGES** | **GBP** |
| 33 | Welcome Coffee (3.35 GBP / pax) - 130 pax | 522.6 |
| 34 | Sandwich Selection 4 items (9.10 GBP / pax) - 130 pax | 1419.6 |
| 35 | Coffee Break (3.35 GBP / pax) - 130 pax | 522.6 |
| 36 | **TOTAL** | **£ 2,464.80** |
| 37 | | |
| 38 | **TOTAL MEETING EXPENDITURES** | **£ 8,459.20** |
| 39 | | |
| 40 | **STAFF RELATED COSTS** | |
| 41 | Based on previous conversation with the Electoral Commission and the Spending for EU referendum campaigners guidelines, it is confirmed that all staff travel, food and accommodation as well as permanent, fixed term and temporary staff costs do not count towards our spending limit. | |

**the WEF did not produce any materials which would set out expectations as to what would happen in the event of a particular outcome or encouraging people to vote**

**documents produced by fulltime staff of the Forum with existing equipments including digital platform**

**the WEF did not use any street banners, websites or Youtube videos**

**utility:based on estimation for 6 Forum staff during 10 working days accumulated (£10/hour)**
**telephone: part of our monthly contract with Swisscom**

**Initial invitations were sent to selected Forum community members**

**badges produced by full time staff with existing equipment. The cost includes ink, printing and lanyards**

**Meeting Overview and Participant Lists are 4 pages each. We will print 5 copies of each**

Meeting expenses

| | A | B |
|---|---|---|
| 1 | **World Economic Forum - Britain in the World**<br>**London, 17 May 2016** | |
| 2 | | |
| 3 | **PC number** | |
| 4 | **Conversion GBP/CHF** | |
| 5 | | |
| 6 | **VENUE COST** | **GBP** |
| 7 | Mansion House Venue hire including staffing, security and other running costs | 5000.00 |
| 8 | Table cloth for afternoon session (11 tables x £5.40) | 59.40 |
| 9 | **TOTAL including VAT** | **£ 5,059.40** |
| 10 | | |
| 11 | **OTHER COSTS** | |
| 12 | Campaign boradcatsers | n/a |
| 13 | advertising of any kinds | n/a |
| 14 | Unsolicited material sent to voters | n/a |
| 15 | Other material about the referendum | n/a |
| 16 | Market research | n/a |
| 17 | Press conference | n/a |
| 18 | Rallies, events | |
| 19 | Transport in connection with publicising your campaign | n/a |
| 20 | Downloadable materials (Meeting Overview and Participant Lists) | n/a |
| 21 | Printed materials (Meeting Overview, Participant Lists and nameplates) | 99 |
| 22 | Overhead and Administrative costs | 0 |
| 23 | Badge for participants (150 pax x £1.32) | 198 |
| 24 | **TOTAL including VAT** | **£ 297.00** |
| 25 | | |
| 26 | **TECHNICAL EQUIPMENT** | **GBP** |
| 27 | Sound system equipment (5 x £60)<br>2 *lapel microphones, 3 rowing microphones* | 300 |
| 28 | 1 sound engineer full day (£350) | 350 |
| 29 | Backdrops and banners are the WEF property | 0 |
| 30 | **TOTAL including VAT** | **£ 650.00** |
| 31 | | |
| 32 | **FOOD & BEVERAGES** | **GBP** |
| 33 | Welcome Coffee (4.02 GBP / pax) - 130 pax | 522.6 |
| 34 | Sandwich Selection 4 items (10.92 GBP / pax) - 130 pax | 1419.6 |
| 35 | Coffee Break (3.35 GBP / pax) - 130 pax | 522.6 |
| 36 | **TOTAL including VAT** | **£ 2,464.80** |
| 37 | | |
| 38 | **TOTAL MEETING EXPENDITURES including VAT** | **£ 8,471.20** |
| 39 | | |
| 40 | **STAFF RELATED COSTS** | |
| 41 | Based on previous conversation with the Electoral Commission and the Spending for EU referendum campaigners guidelines, it is confirmed that all staff travel, food and accommodation as well as permanent, fixed term and temporary staff costs do not count towards our spending limit. | |

**Hostbroadcaster provided by UK government**

**the WEF did not use any street banners, websites or Youtube videos**

**Initial invitations were sent to selected Forum community members**

**no press conference conducted**

**the WEF did not produce any materials which would set out expectations as to what would happen in the event of a particular outcome or encouraging people to vote**

**no publicity conducted**

**no market research conducted**

**see below for venue rental, technical and catering aspects**

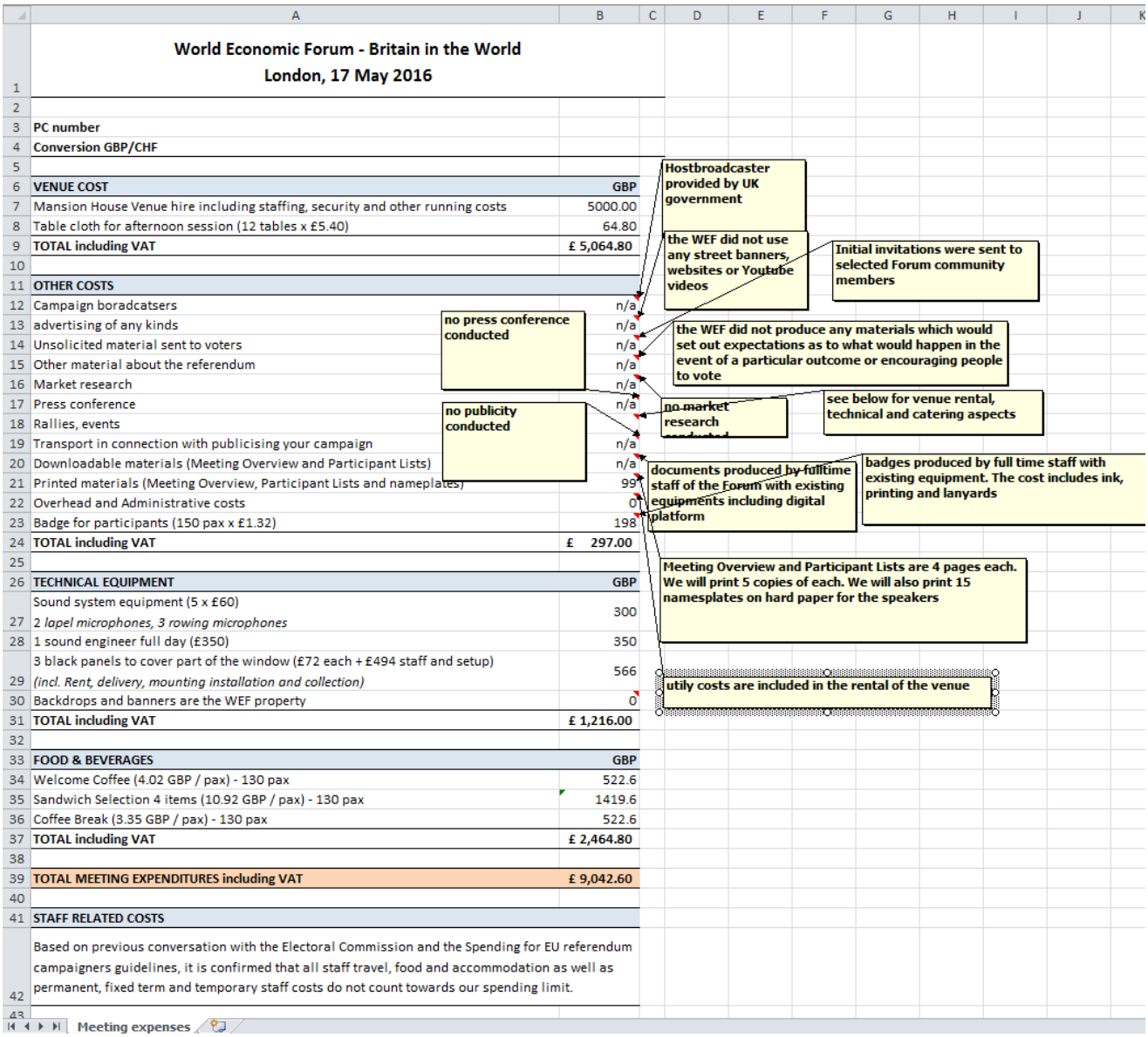
**documents produced by fulltime staff of the Forum with existing equipments including digital platform**

**badges produced by full time staff with existing equipment. The cost includes ink, printing and lanyards**

**Meeting Overview and Participant Lists are 4 pages each. We will print 5 copies of each. We will also print 15 namesplates on hard paper for the speakers**

**utily costs are included in the rental of the venue**

Meeting expenses



| | A | B |
|---|---|---|
| 1 | **World Economic Forum - Britain in the World**<br>**London, 17 May 2016** | |
| 2 | | |
| 3 | **PC number** | |
| 4 | **Conversion GBP/CHF** | |
| 5 | | |
| 6 | **VENUE COST** | **GBP** |
| 7 | Mansion House Venue hire including staffing, security and other running costs | 5000.00 |
| 8 | Table cloth for afternoon session (12 tables x £5.40) | 64.80 |
| 9 | **TOTAL including VAT** | **£ 5,064.80** |
| 10 | | |
| 11 | **OTHER COSTS** | |
| 12 | Campaign boradcatsers | n/a |
| 13 | advertising of any kinds | n/a |
| 14 | Unsolicited material sent to voters | n/a |
| 15 | Other material about the referendum | n/a |
| 16 | Market research | n/a |
| 17 | Press conference | n/a |
| 18 | Rallies, events | n/a |
| 19 | Transport in connection with publicising your campaign | n/a |
| 20 | Downloadable materials (Meeting Overview and Participant Lists) | n/a |
| 21 | Printed materials (Meeting Overview, Participant Lists and nameplates) | 99 |
| 22 | Overhead and Administrative costs | 0 |
| 23 | Badge for participants (150 pax x £1.32) | 198 |
| 24 | **TOTAL including VAT** | **£ 297.00** |
| 25 | | |
| 26 | **TECHNICAL EQUIPMENT** | **GBP** |
| 27 | Sound system equipment (5 x £60)<br>2 *lapel microphones, 3 rowing microphones* | 300 |
| 28 | 1 sound engineer full day (£350) | 350 |
| 29 | 3 black panels to cover part of the window (£72 each + £494 staff and setup)<br>*(incl. Rent, delivery, mounting installation and collection)* | 566 |
| 30 | Backdrops and banners are the WEF property | 0 |
| 31 | **TOTAL including VAT** | **£ 1,216.00** |
| 32 | | |
| 33 | **FOOD & BEVERAGES** | **GBP** |
| 34 | Welcome Coffee (4.02 GBP / pax) - 130 pax | 522.6 |
| 35 | Sandwich Selection 4 items (10.92 GBP / pax) - 130 pax | 1419.6 |
| 36 | Coffee Break (3.35 GBP / pax) - 130 pax | 522.6 |
| 37 | **TOTAL including VAT** | **£ 2,464.80** |
| 38 | | |
| 39 | **TOTAL MEETING EXPENDITURES including VAT** | **£ 9,042.60** |
| 40 | | |
| 41 | **STAFF RELATED COSTS** | |
| 42 | Based on previous conversation with the Electoral Commission and the Spending for EU referendum campaigners guidelines, it is confirmed that all staff travel, food and accommodation as well as permanent, fixed term and temporary staff costs do not count towards our spending limit. | |
| 43 | | |

Hostbroadcaster provided by UK government

the WEF did not use any street banners, websites or Youtube videos

Initial invitations were sent to selected Forum community members

no press conference conducted

the WEF did not produce any materials which would set out expectations as to what would happen in the event of a particular outcome or encouraging people to vote

no publicity conducted

no market research conducted

see below for venue rental, technical and catering aspects

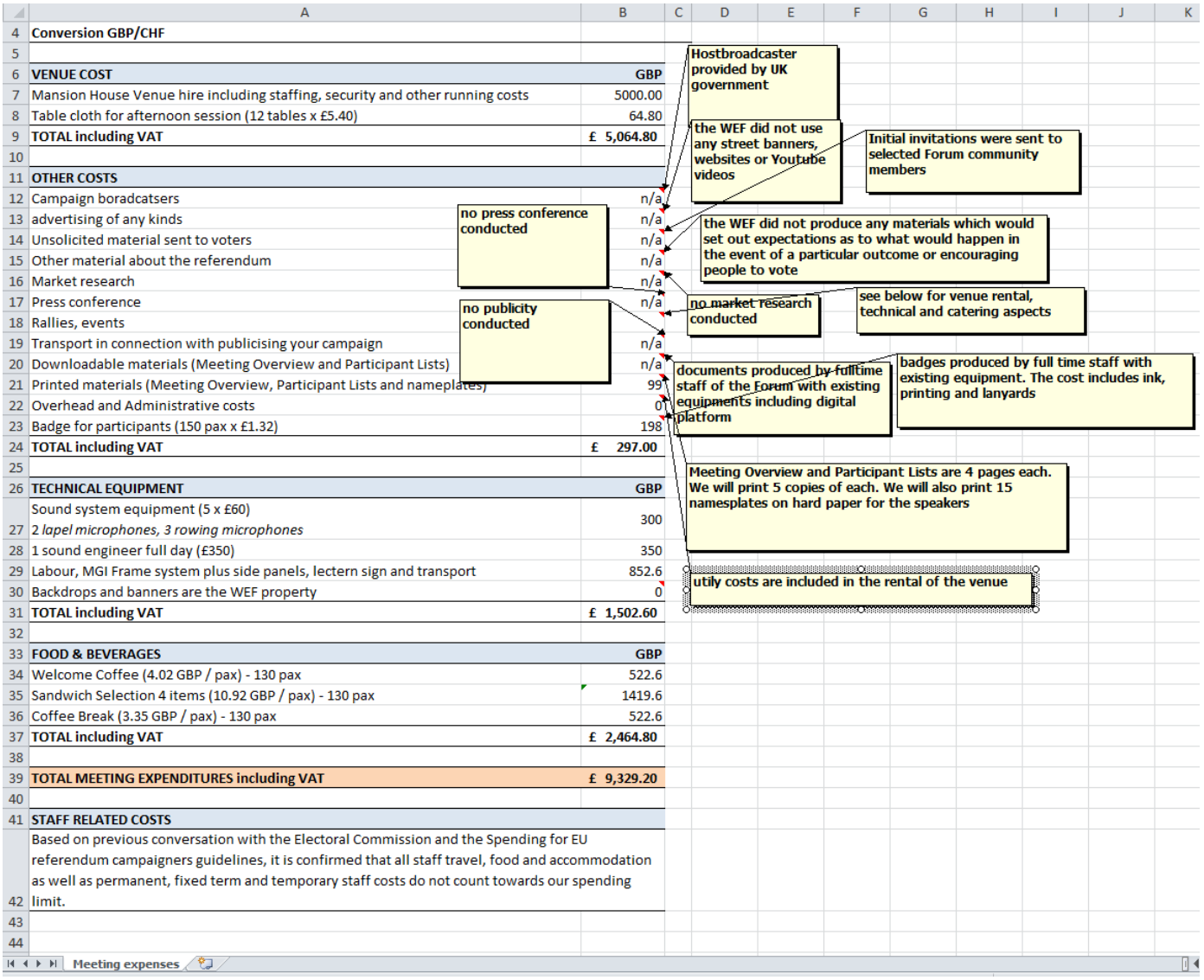
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badges produced by full time staff with existing equipment. The cost includes ink, printing and lanyards

Meeting Overview and Participant Lists are 4 pages each. We will print 5 copies of each. We will also print 15 namesplates on hard paper for the speakers

utily costs are included in the rental of the venue

Meeting expenses



| | A | B |
|---|---|---|
| 4 | **Conversion GBP/CHF** | |
| 5 | | |
| 6 | **VENUE COST** | **GBP** |
| 7 | Mansion House Venue hire including staffing, security and other running costs | 5000.00 |
| 8 | Table cloth for afternoon session (12 tables x £5.40) | 64.80 |
| 9 | **TOTAL including VAT** | **£ 5,064.80** |
| 10 | | |
| 11 | **OTHER COSTS** | |
| 12 | Campaign boradcatsers | n/a |
| 13 | advertising of any kinds | n/a |
| 14 | Unsolicited material sent to voters | n/a |
| 15 | Other material about the referendum | n/a |
| 16 | Market research | n/a |
| 17 | Press conference | n/a |
| 18 | Rallies, events | n/a |
| 19 | Transport in connection with publicising your campaign | n/a |
| 20 | Downloadable materials (Meeting Overview and Participant Lists) | n/a |
| 21 | Printed materials (Meeting Overview, Participant Lists and nameplates) | 99 |
| 22 | Overhead and Administrative costs | 0 |
| 23 | Badge for participants (150 pax x £1.32) | 198 |
| 24 | **TOTAL including VAT** | **£ 297.00** |
| 25 | | |
| 26 | **TECHNICAL EQUIPMENT** | **GBP** |
| 27 | Sound system equipment (5 x £60)<br>2 *lapel microphones, 3 rowing microphones* | 300 |
| 28 | 1 sound engineer full day (£350) | 350 |
| 29 | Labour, MGI Frame system plus side panels, lectern sign and transport | 852.6 |
| 30 | Backdrops and banners are the WEF property | 0 |
| 31 | **TOTAL including VAT** | **£ 1,502.60** |
| 32 | | |
| 33 | **FOOD & BEVERAGES** | **GBP** |
| 34 | Welcome Coffee (4.02 GBP / pax) - 130 pax | 522.6 |
| 35 | Sandwich Selection 4 items (10.92 GBP / pax) - 130 pax | 1419.6 |
| 36 | Coffee Break (3.35 GBP / pax) - 130 pax | 522.6 |
| 37 | **TOTAL including VAT** | **£ 2,464.80** |
| 38 | | |
| 39 | **TOTAL MEETING EXPENDITURES including VAT** | **£ 9,329.20** |
| 40 | | |
| 41 | **STAFF RELATED COSTS** | |
| 42 | Based on previous conversation with the Electoral Commission and the Spending for EU referendum campaigners guidelines, it is confirmed that all staff travel, food and accommodation as well as permanent, fixed term and temporary staff costs do not count towards our spending limit. | |
| 43 | | |
| 44 | | |

Hostbroadcaster provided by UK government

the WEF did not use any street banners, websites or Youtube videos

Initial invitations were sent to selected Forum community members

no press conference conducted

the WEF did not produce any materials which would set out expectations as to what would happen in the event of a particular outcome or encouraging people to vote

no publicity conducted

no market research conducted

see below for venue rental, technical and catering aspects

documents produced by fulltime staff of the Forum with existing equipments including digital platform

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Meeting Overview and Participant Lists are 4 pages each. We will print 5 copies of each. We will also print 15 namesplates on hard paper for the speakers

utily costs are included in the rental of the venue

Meeting expenses

[redacted]

**From:** [redacted]
**Sent:** 10 May 2016 11:35
**To:** [redacted]
**Subject:** FW: AV/WIFI Costs

---

**From:** [redacted]
**Sent:** 29 April 2016 18:23
**To:** [redacted]
**Cc:** [redacted]
**Subject:** RE: AV/WIFI Costs

Thank you [redacted]!

Have a lovely weekend as well.

Kind regards

[redacted]

[redacted]
Office of The Rt. Hon The Lord Mayor
Mansion House, EC4N 8BH
[redacted]
[redacted]
[redacted]
www.cityoflondon.gov.uk/lordmayor

---

[redacted]
**Sent:** 29 April 2016 17:22
[redacted]
**Subject:** Re: AV/WIFI Costs

Dear [redacted]

Thanks a lot for the call this morning, very useful!

And thanks for the below costs, I'll run that through with [redacted] and will get back to you next week!

Enjoy your long week end, hopefully the sun comes out!

Best,
[redacted]

On 29 Apr 2016, at 17:02, [redacted] wrote:

Dear [redacted]

Good to speak to this morning.

Please find below information for AV and WIFI set-up:

**AV**

£350.00 per day to cover MH Sound Engineering needs regardless of timings, they will be fully committed to your event.

The SM58 Beta Hand-Held Mics or Shure Radio Lapel Mics would be charged at £60.00 per channel for the entire event.

They have checked the radio equipment availability which is fine at present for the 16-17th May.

**WIFI**

For a one day event the cost is £1,350 plus VAT.

This includes set-up in the Old Ballroom and Egyptian Hall, configuration, on-site engineers(s) and post event take-down.

If you would like to proceed then please let me know as soon as or have further questions.

Kind regards

[redacted]

[redacted]
Office of The Rt. Hon The Lord Mayor
Mansion House, EC4N 8BH
[redacted]
www.cityoflondon.gov.uk/lordmayor

This message is for the designated recipient only and may contain privileged, proprietary, or otherwise confidential information. If you have received it in error, please notify the sender immediately and delete the original. Any other use of the e-mail by you is prohibited.

[redacted]

**From:** [redacted]
**Sent:** 10 May 2016 11:35
**To:** [redacted]
**Subject:** FW: Event enquiry - 17 May 2016

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**From:** [redacted]
**Sent:** 17 March 2016 11:41
**To:** [redacted]
**Subject:** RE: Event enquiry - 17 May 2016

[redacted]

Below are the outline costs to cover staffing, security and other running costs and quotes from our caterers for the refreshments. My colleagues have also asked about the audio visual requirements and I include their questions below. One protocol matter also needs to be raised at this stage; As the Mansion House is the principally the private residence of the Lord Mayor of London, there is a need for him to be at events in his 'house' (either partly or wholly) and to welcome guests to events held here. In essence, can a short introduction by the Lord Mayor be included at the start of the event? I understand that [redacted] has been involved with events held at City of London Corporation venues, so I doubt this will seem unusual to him.

In terms of the format we see the event for 200 pax taking place on the first floor of the House with the event for 50 pax happening on the second floor. Assuming that we proceed, we think that it is essential that the team organising this event come over to the Mansion House so that we can talk things through and confirm all the arrangements. We could also begin the set-up at 6pm on 16th May.

The date has been reserved in our diary so if everything else I have outlined is ok we can confirm this. Please get in touch if you need to discuss further at this stage.

Best regards

[redacted]

AV points/questions:

Do they want us to appoint and manage a supplier or will they bring in their own?
How much staging/what type is needed?
What type of microphones will be needed (e.g. roaming/set/lapel)? – we can supply depending on set up and agenda of speakers
Will screens for presentations be needed, if so what type?
If Mansion House are running, a sound engineer will be needed.

**Press/Media** - Assume they will be at the event, will they need staging and possible spot lights or increased lighting?

Costs

- Staffing, security and other running costs - £5,000
- AV – a quote can be provided if you want Mansion House to arrange the supplier.
- Catering:

200 pax event

Welcome Tea/Coffee and water - £3.35 per person

Finger food buffet - £15.40 per person ( 4 items per person)
Or
£23.40 per person ( 6 items per person)

Juices - £4.90 per litre (on consumption)
Bottled water - £3.30 per litre bottle

All prices exclude VAT

50 pax event

Welcome Tea/Coffee and water - £3.35 per person

2 course Hot Standing Buffet - £26.20 per person

Juices - £4.90 per litre (on consumption)
Bottled water - £3.30 per litre

All prices exclude VAT

Extras:
- Table cloths for break out rooms and tables (if any in EH) - £4.50 per cloth used ex VAT

---

**From:** [redacted]
**Sent:** 16 March 2016 16:50
**To:** [redacted]
**Subject:** RE: Event enquiry - 17 May 2016

Yes [redacted] this is correct.
Thank you,
[redacted]

---

**From:** [redacted]
**Sent:** 16 March 2016 17:46
**To:** [redacted]
**Subject:** RE: Event enquiry - 17 May 2016

[redacted]

Thanks. This appears to indicate two separate events, one for 200 pax and one for 50 pax, happening at the same time, is that correct?

[redacted]

---

**From:** [redacted]
**Sent:** 16 March 2016 16:39
**To:** [redacted]
**Subject:** FW: Event enquiry - 17 May 2016

Dear [redacted]

Following our discussion, I am pleased to share with you our revised schedule and requirements for our meeting on Tuesday 17 May 2016.

I truly appreciate your help and support in getting this booking confirmed at your earliest suitability. As you know we are working together with Number 10 in order to send out the invitations as soon as possible .

| Timing | | Set up | Catering | AV |
|---|---|---|---|---|

| | | | | |
|---|---|---|---|---|
| as of 10 am | Registration Opens | a registration desk (2 rectangular tables) | welcome coffee - 200 pax | n/a |
| 10.30 - 12.00 | Morning Session | theatre style - 200 pax | n/a | microphones |
| 12.00 - 12.30 | Networking | High tables | n/a | n/a |
| 12.30 - 13.00 | Standing Lunch | High tables and finger food buffet - 200 pax | Finger Food Buffet – 200 pax | n/a |
| 13.00 - 14.00 | Afternoon Session 1 | Breakout groups (4 circles of 50 chairs) | n/a | microphones |
| 14.00 - 15.00 | Afternoon Session 2 | theatre style - 200 pax (the participants will just turn their seats around to face the speaker) | n/a | microphones |

| **Timing** | | **Set up** | **Catering** | **AV** |
|---|---|---|---|---|
| as of 10 am | Registration Opens | a registration desk (2 rectangular tables) | welcome coffee - 50 pax | n/a |
| 10.30 - 12.00 | Morning Session | theatre style - 50 pax | n/a | microphones |
| 12.00 - 13.00 | Standing Lunch | buffet buffet - 50 pax | Buffet Lunch or standing lunch - 50 pax | n/a |
| 13.00 - 15.00 | Afternoon Session | theatre style - 50 pax | n/a | microphones |

Please do not hesitate to reach out to me at any time should you have any questions or require clarity on some areas.
Once again, I thank you for your consideration.

With best regards,
[redacted]

---

**From:** [redacted]
**Sent:** 14 March 2016 11:59
**To:** [redacted]
**Subject:** Event enquiry - 17 May 2016

Dear [redacted]

Following our call earlier this morning, please find below my request.

I am working closely with [redacted] from Number 10 and [redacted] World Economic Forum, regarding an upcoming event on May 17 with key senior cabinet officials.
The event is planned to start around 9 am and finish around 3 or 4 pm. Please find hereafter a first draft of the requirements:

- a registration area/desk
- 1 plenary room, theatre style 200 pax
- 1 networking room for standing meeting, some high tables for 200 pax
- 1 room for a seated lunch for 200 pax
- 1 meeting room theatre style for 50 pax
- 1 – 2 small rooms for 4 to 6 pax

I hope this is sufficient information, please do not hesitate to contact me should you have any further questions.
Also, could you please let me know when I could expect an answer from your side?

With my best regards,
[redacted]

[redacted]
World Economic Forum
www.weforum.org

[redacted]

_____
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[redacted]

**From:** [redacted]
**Sent:** 10 May 2016 11:53
**To:** [redacted]
**Subject:** FW: Costs for printing badges

---

**From:** [redacted]
**Sent:** 10 May 2016 12:52
**To:** [redacted]
**Cc:** [redacted]
**Subject:** RE: Costs for printing badges

Dear [redacted],

Including lanyard (necklace), approx. price is 1.50 CHF per badge.

Best regards,

[redacted]

World Economic Forum
91-93 route de la Capite
CH-1223 Cologny/Geneva
[redacted]

[redacted]

Visit our website at http://www.weforum.org

---

**From:** [redacted]
**Sent:** 10 May 2016 12:42
**To:** [redacted]
**Cc:** [redacted]
**Subject:** Costs for printing badges

Dear [redacted],

As per our phone conversation earlier, can you please confirm in writing the costs related to a badge (cost price per item, including printing & the 'necklace').

Thank you in advance!
[redacted]

---

[redacted]

**World Economic Forum** | 91-93 Route de la Capite | Cologny/Geneva CH-1223, Switzerland
[redacted]

swisscom

**Itemised statement/Costs**
**Mobile communication**

Swisscom (Switzerland) Ltd, Enterprise Customers, CH-3050 Berne

World Economic Forum
rte de La-Capite 91
1223 Cologny

| | |
|---|---|
| Month | 01.03.16 - 31.03.16 |
| **Phone number** | [redacted] |
| Customer number | [redacted] |

Entries indicated as CHF 0.00 are free units used in the subscription or free-of-charge calls as part of special promotions.
All call prices are indicated in accordance with price list. **All prices are in CHF.**
In order to make the bill clearer, data connections charged at bulk rates are grouped together each day.

| | quantity | incl. VAT |
|---|---|---|
| **Recurring services** | | |
| --- | | |
| --- | | |
| MDS Lifecycle Management | 1 Number | 5.40 |
| NATEL® go Global | 1 Chiffre | 287.00 |
| | **total** | **292.40** |

**Swisscom (Switzerland) Ltd**
Enterprise Customers
CH-3050 Berne

**Telephone** [redacted]
**Fax** [redacted]
www.swisscom.ch

[redacted]
Swisscom (Switzerland) Ltd
Alte Tiefenaustrasse 6
CH-3050 Berne

| Month | 01.03.16 - 31.03.16 |
|---|---|
| Phone number | [redacted] |

## International from Switzerland: Telephony

| Date | Time | Service | Target number | Connection destination , Tariff | Duration/quantity/KB | Amount |
|---|---|---|---|---|---|---|
| 06.03.16 | 12:33:18 | Telephony to zone Europe, included | [redacted] | | 00:00:03 | 0.00 |
| 09.03.16 | 11:36:50 | Telephony to zone Europe, included | [redacted] | | 00:00:01 | 0.00 |
| 09.03.16 | 11:37:24 | Telephony to zone Europe, included | [redacted] | | 00:09:09 | 0.00 |
| 09.03.16 | 11:46:58 | Telephony to zone Europe, included | [redacted] | | 00:02:29 | 0.00 |
| 10.03.16 | 18:54:17 | Telephony to zone Europe, included | [redacted] | | 00:00:03 | 0.00 |
| 10.03.16 | 18:55:15 | Telephony to zone Europe, included | [redacted] | | 00:32:23 | 0.00 |
| 10.03.16 | 19:27:51 | Telephony to zone Europe, included | [redacted] | | 00:14:48 | 0.00 |
| 11.03.16 | 14:46:44 | Telephony to zone Global, included | [redacted] | | 00:00:49 | 0.00 |
| 11.03.16 | 17:02:02 | Telephony to zone Europe, included | [redacted] | | 00:02:32 | 0.00 |
| 11.03.16 | 17:07:03 | Telephony to zone Europe, included | [redacted] | | 00:01:12 | 0.00 |
| 11.03.16 | 18:16:41 | Telephony to zone Global, included | [redacted] | | 00:00:02 | 0.00 |
| 11.03.16 | 18:17:49 | Telephony to zone Global, included | [redacted] | | 00:00:24 | 0.00 |
| 14.03.16 | 10:27:56 | Telephony to zone Europe, included | [redacted] | | 00:02:28 | 0.00 |
| 14.03.16 | 14:57:47 | Telephony to zone Europe, included | [redacted] | | 00:02:46 | 0.00 |
| 14.03.16 | 15:07:28 | Telephony to zone Europe, included | [redacted] | | 00:03:56 | 0.00 |
| 14.03.16 | 21:28:02 | Telephony to zone Europe, included | [redacted] | | 00:00:02 | 0.00 |
| 14.03.16 | 21:28:58 | Telephony to zone Europe, included | [redacted] | | 00:00:02 | 0.00 |
| 14.03.16 | 21:37:51 | Telephony to zone Europe | [redacted] | | 00:00:00 | 0.00 |
| 15.03.16 | 10:22:09 | Telephony to zone Europe, included | [redacted] | | 00:08:00 | 0.00 |
| 15.03.16 | 11:05:27 | Telephony to zone Europe, included | [redacted] | | 00:08:08 | 0.00 |
| 15.03.16 | 11:14:13 | Telephony to zone Europe, included | [redacted] | | 00:03:41 | 0.00 |
| 15.03.16 | 12:21:23 | Telephony to zone Europe, included | [redacted] | | 00:01:35 | 0.00 |
| 16.03.16 | 12:34:36 | Telephony to zone Neighbours, included | [redacted] | | 00:00:25 | 0.00 |
| 16.03.16 | 14:18:25 | Telephony to zone Europe, included | [redacted] | | 00:05:02 | 0.00 |
| | | | | | **Carried over** | **0.00** |

swisscom

| | |
|---|---|
| Month | 01.03.16 - 31.03.16 |
| Phone number | [redacted] |

## International from Switzerland: Telephony, Continued

| Date | Time | Service | Target number | Connection destination , Tariff | Duration/quantity/KB | Amount |
|---|---|---|---|---|---|---|
| | | | | | **Carried over** | **0.00** |
| 16.03.16 | 14:27:20 | Telephony to zone Europe, included | [redacted] | | 00:07:56 | 0.00 |
| 16.03.16 | 14:45:10 | Telephony to zone Europe, included | [redacted] | | 00:04:29 | 0.00 |
| 16.03.16 | 14:51:27 | Telephony to zone Europe, included | [redacted] | | 00:18:23 | 0.00 |
| 16.03.16 | 15:15:26 | Telephony to zone Europe, included | [redacted] | | 00:02:50 | 0.00 |
| 16.03.16 | 15:21:59 | Telephony to zone Europe, included | [redacted] | | 00:01:48 | 0.00 |
| 16.03.16 | 15:30:54 | Telephony to zone Europe, included | [redacted] | | 00:00:41 | 0.00 |
| 16.03.16 | 15:39:06 | Telephony to zone Europe, included | [redacted] | | 00:01:56 | 0.00 |
| 16.03.16 | 15:41:41 | Telephony to zone Europe, included | [redacted] | | 00:02:26 | 0.00 |
| 16.03.16 | 15:46:20 | Telephony to zone Europe, included | [redacted] | | 00:02:00 | 0.00 |
| 16.03.16 | 15:50:42 | Telephony to zone Europe, included | [redacted] | | 00:02:47 | 0.00 |
| 16.03.16 | 16:26:32 | Telephony to zone Europe, included | [redacted] | | 00:02:03 | 0.00 |
| 16.03.16 | 16:33:02 | Telephony to zone Europe, included | [redacted] | | 00:03:59 | 0.00 |
| 16.03.16 | 16:52:09 | Telephony to zone Europe, included | [redacted] | | 00:06:12 | 0.00 |
| 16.03.16 | 17:11:22 | Telephony to zone Europe, included | [redacted] | | 00:03:18 | 0.00 |
| 16.03.16 | 18:01:18 | Telephony to zone Europe, included | [redacted] | | 00:01:30 | 0.00 |
| 16.03.16 | 18:54:35 | Telephony to zone Europe, included | [redacted] | | 00:49:06 | 0.00 |
| 16.03.16 | 19:45:03 | Telephony to zone Neighbours, included | [redacted] | | 00:14:19 | 0.00 |
| 21.03.16 | 10:41:40 | Telephony to zone Europe, included | [redacted] | | 00:09:24 | 0.00 |
| 22.03.16 | 08:38:29 | Telephony to zone Europe, included | [redacted] | | 00:16:46 | 0.00 |
| 24.03.16 | 13:00:28 | Telephony to zone Europe, included | [redacted] | | 00:00:01 | 0.00 |
| | | | | | Total | 0.00 |

## International from Switzerland: Messages

| Date | Time | Service | Target number | Connection destination , Tariff | Duration/quantity/KB | Amount |
|---|---|---|---|---|---|---|
| 10.03.16 | 09:15:18 | SMS international, included | [redacted] | | 1 | 0.00 |
| | | | | | **Carried over** | **0.00** |

**Please turn over >**

## International from Switzerland: Messages, Continued

| Date | Time | Service | Target number | Connection destination , Tariff | Duration/quantity/KB | Amount |
|---|---|---|---|---|---|---|
| | | | | | **Carried over** | **0.00** |
| 10.03.16 | 09:15:19 | SMS international, included | [redacted] | | 1 | 0.00 |
| 17.03.16 | 09:05:00 | SMS international, included | [redacted] | | 1 | 0.00 |
| | | | | | Total | 0.00 |

## National: Telephony

| Date | Time | Service | Target number | Connection destination , Tariff | Duration/quantity/KB | Amount |
|---|---|---|---|---|---|---|
| 01.03.16 | 15:40:17 | Telephony to other operators' fixed network, included | [redacted] | | 00:36:54 | 0.00 |
| 01.03.16 | 19:42:26 | Telephony to mobile network Swisscom | [redacted] | | 00:00:02 | 0.00 |
| 03.03.16 | 12:53:37 | Telephony to mobile network Swisscom | [redacted] | | 00:00:04 | 0.00 |
| 03.03.16 | 12:55:59 | Telephony to mobile network Swisscom | [redacted] | | 00:00:07 | 0.00 |
| 03.03.16 | 13:14:16 | Telephony to mobile network Swisscom | [redacted] | | 00:00:02 | 0.00 |
| 03.03.16 | 18:03:35 | Telephony to mobile network Swisscom | [redacted] | | 00:00:02 | 0.00 |
| 04.03.16 | 16:41:33 | Telephony to mobile network Swisscom | [redacted] | | 00:00:01 | 0.00 |
| 06.03.16 | 18:08:37 | Telephony to mobile network Swisscom | [redacted] | | 00:00:03 | 0.00 |
| 06.03.16 | 18:13:22 | Telephony to mobile network Swisscom | [redacted] | | 00:00:01 | 0.00 |
| 07.03.16 | 16:32:21 | Telephony to mobile network Swisscom, included | [redacted] | | 00:01:12 | 0.00 |
| 07.03.16 | 16:42:56 | Telephony to other operators' fixed network, included | [redacted] | | 00:18:37 | 0.00 |
| 07.03.16 | 19:32:38 | Telephony to mobile network Swisscom | [redacted] | | 00:00:03 | 0.00 |
| 08.03.16 | 14:58:42 | Telephony to mobile network Swisscom, included | [redacted] | | 00:01:44 | 0.00 |
| 08.03.16 | 18:02:18 | Telephony to mobile network Swisscom | [redacted] | | 00:00:04 | 0.00 |
| 08.03.16 | 20:56:57 | Telephony to mobile network Swisscom | [redacted] | | 00:00:02 | 0.00 |
| 09.03.16 | 16:17:08 | Telephony to mobile network Swisscom, included | [redacted] | | 00:01:16 | 0.00 |
| 11.03.16 | 14:44:50 | Telephony to mobile network Swisscom | [redacted] | | 00:00:36 | 0.00 |
| 11.03.16 | 17:37:17 | Telephony to mobile network Swisscom | [redacted] | | 00:00:02 | 0.00 |
| | | | | | **Carried over** | **0.00** |

swisscom

| | |
|---|---|
| Month | 01.03.16 - 31.03.16 |
| Phone number | [redacted] |

## National: Telephony, Continued

| Date | Time | Service | Target number | Connection destination , Tariff | Duration/quantity/KB | Amount |
|---|---|---|---|---|---|---|
| | | | | **Carried over** | | **0.00** |
| 11.03.16 | 17:47:34 | Telephony to mobile network Swisscom | [redacted] | | 00:00:01 | 0.00 |
| 11.03.16 | 18:16:33 | Telephony to mobile network Swisscom | [redacted] | | 00:00:27 | 0.00 |
| 14.03.16 | 16:38:00 | Telephony to mobile network Swisscom, included | [redacted] | | 00:01:04 | 0.00 |
| 14.03.16 | 17:50:57 | Telephony to mobile network Swisscom, included | [redacted] | | 00:05:22 | 0.00 |
| 15.03.16 | 10:35:52 | Telephony to mobile network Swisscom, included | [redacted] | | 00:01:24 | 0.00 |
| 15.03.16 | 18:23:57 | Telephony to mobile network Swisscom | [redacted] | | 00:00:03 | 0.00 |
| 15.03.16 | 20:04:54 | Telephony to mobile network Swisscom | [redacted] | | 00:00:02 | 0.00 |
| 15.03.16 | 20:05:00 | Telephony to mobile network Swisscom | [redacted] | | 00:00:03 | 0.00 |
| 15.03.16 | 20:10:09 | Telephony to mobile network Swisscom | [redacted] | | 00:00:02 | 0.00 |
| 15.03.16 | 20:14:37 | Telephony to mobile network Swisscom | [redacted] | | 00:00:02 | 0.00 |
| 16.03.16 | 15:22:55 | Telephony to mobile network Swisscom | [redacted] | | 00:00:02 | 0.00 |
| 16.03.16 | 15:23:03 | Telephony to mobile network Swisscom | [redacted] | | 00:00:02 | 0.00 |
| 16.03.16 | 16:54:48 | Telephony to mobile network Swisscom | [redacted] | | 00:00:03 | 0.00 |
| 17.03.16 | 19:39:02 | Telephony to mobile network Swisscom | [redacted] | | 00:00:03 | 0.00 |
| 17.03.16 | 19:39:13 | Telephony to mobile network Swisscom | [redacted] | | 00:00:02 | 0.00 |
| 17.03.16 | 19:40:46 | Telephony to mobile network Swisscom | [redacted] | | 00:00:01 | 0.00 |
| 17.03.16 | 19:41:23 | Telephony to mobile network Swisscom | [redacted] | | 00:00:01 | 0.00 |
| 19.03.16 | 20:05:40 | Telephony to mobile network Swisscom | [redacted] | | 00:00:01 | 0.00 |
| 20.03.16 | 18:50:09 | Telephony to mobile network Swisscom | [redacted] | | 00:00:03 | 0.00 |
| 20.03.16 | 20:02:27 | Telephony to mobile network Swisscom | [redacted] | | 00:00:02 | 0.00 |
| 21.03.16 | 10:55:18 | Telephony to fixed network Swisscom, included | [redacted] | | 00:01:56 | 0.00 |
| 21.03.16 | 10:58:35 | Telephony to fixed network Swisscom, included | [redacted] | | 00:03:06 | 0.00 |
| | | | | **Carried over** | | **0.00** |

**Please turn over >**

| | |
|---|---|
| Month | 01.03.16 - 31.03.16 |
| Phone number | [redacted] |

## National: Telephony, Continued

| Date | Time | Service | Target number | Connection destination , Tariff | Duration/quantity/KB | Amount |
|---|---|---|---|---|---|---|
| | | | | | **Carried over** | **0.00** |
| 21.03.16 | 11:02:25 | Telephony to fixed network Swisscom, included | [redacted] | | 00:01:49 | 0.00 |
| 22.03.16 | 12:38:30 | Telephony to mobile network Swisscom | [redacted] | | 00:00:02 | 0.00 |
| 22.03.16 | 15:28:41 | Telephony to other operators' fixed network, included | [redacted] | | 00:09:36 | 0.00 |
| | | | | | Total | 0.00 |

## National: Messages

| Date | Time | Service | Target number | Connection destination , Tariff | Duration/quantity/KB | Amount |
|---|---|---|---|---|---|---|
| 07.03.16 | 11:59:18 | SMS national, included | [redacted] | | 1 | 0.00 |
| 07.03.16 | 11:59:20 | SMS national, included | [redacted] | | 1 | 0.00 |
| 07.03.16 | 12:13:31 | SMS national, included | [redacted] | | 1 | 0.00 |
| | | | | | Total | 0.00 |

## National: Data

| Date | Time | Service | Target number | Connection destination , Tariff | Duration/quantity/KB | Amount |
|---|---|---|---|---|---|---|
| 29.02.16 | 08:06:31 | Data national, included | --- | | 4104.0 | 0.00 |
| 01.03.16 | 00:00:00 | Data national, included | --- | | 8641.0 | 0.00 |
| 02.03.16 | 00:00:00 | Data national, included | --- | | 4961.0 | 0.00 |
| 02.03.16 | 08:17:25 | Data national, included | --- | | 12327.0 | 0.00 |
| 03.03.16 | 08:17:13 | Data national, included | --- | | 388.0 | 0.00 |
| 03.03.16 | 09:01:29 | Data national, included | --- | | 2942.0 | 0.00 |
| 03.03.16 | 22:01:19 | Data national, included | --- | | 191062.0 | 0.00 |
| 04.03.16 | 07:04:46 | Data national, included | --- | | 292.0 | 0.00 |
| 04.03.16 | 07:05:03 | Data national, included | --- | | 388.0 | 0.00 |
| 04.03.16 | 11:14:05 | Data national, included | --- | | 1710.0 | 0.00 |
| 05.03.16 | 00:00:00 | Data national, included | --- | | 2637.0 | 0.00 |
| 05.03.16 | 09:36:32 | Data national, included | --- | | 3189.0 | 0.00 |
| 06.03.16 | 08:16:27 | Data national, included | --- | | 1681.0 | 0.00 |
| 07.03.16 | 07:47:10 | Data national, included | --- | | 3098.0 | 0.00 |
| 08.03.16 | 06:43:45 | Data national, included | --- | | 50062.0 | 0.00 |
| 09.03.16 | 00:00:00 | Data national, included | --- | | 65.0 | 0.00 |
| 09.03.16 | 07:02:18 | Data national, included | --- | | 9223.0 | 0.00 |
| 10.03.16 | 06:45:11 | Data national, included | --- | | 203.0 | 0.00 |
| 10.03.16 | 07:55:16 | Data national, included | --- | | 24225.0 | 0.00 |
| | | | | | **Carried over** | **0.00** |

swisscom

| | |
|---|---|
| Month | 01.03.16 - 31.03.16 |
| Phone number | [redacted] |

## National: Data, Continued

| Date | Time | Service | Target number | Connection destination , Tariff | Duration/quantity/KB | Amount |
|---|---|---|---|---|---|---|
| | | | | | **Carried over** | **0.00** |
| 11.03.16 | 07:07:00 | Data national, included | --- | | 1846.0 | 0.00 |
| 11.03.16 | 10:39:55 | Data national, included | --- | | 36194.0 | 0.00 |
| 11.03.16 | 12:08:32 | Data national, included | --- | | 55100.0 | 0.00 |
| 11.03.16 | 14:28:27 | Data national, included | --- | | 37839.0 | 0.00 |
| 12.03.16 | 07:16:18 | Data national, included | --- | | 904.0 | 0.00 |
| 12.03.16 | 11:49:23 | Data national, included | --- | | 595.0 | 0.00 |
| 12.03.16 | 14:45:31 | Data national, included | --- | | 232705.0 | 0.00 |
| 12.03.16 | 19:15:34 | Data national, included | --- | | 274.0 | 0.00 |
| 13.03.16 | 00:00:00 | Data national, included | --- | | 252.0 | 0.00 |
| 13.03.16 | 09:39:32 | Data national, included | --- | | 347.0 | 0.00 |
| 14.03.16 | 07:20:25 | Data national, included | --- | | 10807.0 | 0.00 |
| 15.03.16 | 07:05:38 | Data national, included | --- | | 19502.0 | 0.00 |
| 16.03.16 | 07:47:17 | Data national, included | --- | | 1124.0 | 0.00 |
| 16.03.16 | 10:02:15 | Data national, included | --- | | 10029.0 | 0.00 |
| 17.03.16 | 07:19:22 | Data national, included | --- | | 21009.0 | 0.00 |
| 18.03.16 | 07:41:28 | Data national, included | --- | | 3004.0 | 0.00 |
| 19.03.16 | 00:00:00 | Data national, included | --- | | 4.0 | 0.00 |
| 19.03.16 | 08:07:59 | Data national, included | --- | | 5005.0 | 0.00 |
| 19.03.16 | 20:20:29 | Data national, included | --- | | 780.0 | 0.00 |
| 20.03.16 | 07:26:34 | Data national, included | --- | | 724.0 | 0.00 |
| 20.03.16 | 10:54:35 | Data national, included | --- | | 46.0 | 0.00 |
| 20.03.16 | 11:12:57 | Data national, included | --- | | 38.0 | 0.00 |
| 20.03.16 | 11:25:10 | Data national, included | --- | | 18.0 | 0.00 |
| 20.03.16 | 11:36:53 | Data national, included | --- | | 30.0 | 0.00 |
| 20.03.16 | 11:39:22 | Data national, included | --- | | 14.0 | 0.00 |
| 20.03.16 | 11:44:55 | Data national, included | --- | | 170.0 | 0.00 |
| 20.03.16 | 12:11:05 | Data national, included | --- | | 57.0 | 0.00 |
| 20.03.16 | 12:24:12 | Data national, included | --- | | 374.0 | 0.00 |
| 20.03.16 | 12:58:38 | Data national, included | --- | | 1368.0 | 0.00 |
| 20.03.16 | 17:45:21 | Data national, included | --- | | 213.0 | 0.00 |
| 21.03.16 | 06:34:54 | Data national, included | --- | | 2108.0 | 0.00 |
| 22.03.16 | 06:55:37 | Data national, included | --- | | 9536.0 | 0.00 |
| 23.03.16 | 00:00:00 | Data national, included | --- | | 48.0 | 0.00 |
| | | | | | **Carried over** | **0.00** |

**Please turn over >**

## National: Data, Continued

| Date | Time | Service | Target number | Connection destination , Tariff | Duration/quantity/KB | Amount |
|---|---|---|---|---|---|---|
| | | | | | **Carried over** | **0.00** |
| 23.03.16 | 08:03:27 | Data national, included | --- | | 8833.0 | 0.00 |
| 23.03.16 | 19:00:15 | Data national, included | --- | | 506.0 | 0.00 |
| 24.03.16 | 00:00:00 | Data national, included | --- | | 21.0 | 0.00 |
| 24.03.16 | 07:26:59 | Data national, included | --- | | 4619.0 | 0.00 |
| 24.03.16 | 12:00:54 | Data national, included | --- | | 1098.0 | 0.00 |
| 24.03.16 | 12:28:50 | Data national, included | --- | | 34.0 | 0.00 |
| 24.03.16 | 12:33:42 | Data national, included | --- | | 48995.0 | 0.00 |
| | | | | | Total | 0.00 |

## Intra company: Telephony

| Date | Time | Service | Target number | Connection destination , Tariff | Duration/quantity/KB | Amount |
|---|---|---|---|---|---|---|
| 01.03.16 | 19:17:25 | Calls within the company | [redacted] | | 00:00:07 | 0.00 |
| 01.03.16 | 19:30:04 | Calls within the company | [redacted] | | 00:00:16 | 0.00 |
| 02.03.16 | 13:08:49 | Calls within the company | [redacted] | | 00:00:01 | 0.00 |
| 03.03.16 | 14:39:34 | Calls within the company | [redacted] | | 00:00:21 | 0.00 |
| 03.03.16 | 19:20:33 | Calls within the company | [redacted] | | 00:00:02 | 0.00 |
| 07.03.16 | 09:09:45 | Calls within the company | [redacted] | | 00:00:02 | 0.00 |
| 07.03.16 | 09:48:37 | Calls within the company | [redacted] | | 00:00:02 | 0.00 |
| 07.03.16 | 11:39:10 | Calls within the company | [redacted] | | 00:03:28 | 0.00 |
| 07.03.16 | 13:49:58 | Calls within the company | [redacted] | | 00:01:11 | 0.00 |
| 09.03.16 | 17:23:10 | Calls within the company | [redacted] | | 00:00:33 | 0.00 |
| 11.03.16 | 14:48:11 | Calls within the company | [redacted] | | 00:01:06 | 0.00 |
| 11.03.16 | 14:49:38 | Calls within the company | [redacted] | | 00:02:34 | 0.00 |
| 11.03.16 | 16:01:39 | Calls within the company | [redacted] | | 00:02:04 | 0.00 |
| 11.03.16 | 17:55:24 | Calls within the company | [redacted] | | 00:00:01 | 0.00 |
| 14.03.16 | 17:49:18 | Calls within the company | [redacted] | | 00:01:05 | 0.00 |
| 14.03.16 | 17:58:04 | Calls within the company | [redacted] | | 00:00:01 | 0.00 |
| 14.03.16 | 18:11:25 | Calls within the company | [redacted] | | 00:03:41 | 0.00 |
| 15.03.16 | 09:02:01 | Calls within the company | [redacted] | | 00:00:09 | 0.00 |
| 15.03.16 | 14:40:32 | Calls within the company | [redacted] | | 00:00:10 | 0.00 |
| 15.03.16 | 18:55:55 | Calls within the company | [redacted] | | 00:01:40 | 0.00 |
| 15.03.16 | 20:03:54 | Calls within the company | [redacted] | | 00:00:01 | 0.00 |
| 15.03.16 | 20:04:28 | Calls within the company | [redacted] | | 00:00:02 | 0.00 |
| 15.03.16 | 20:04:57 | Calls within the company | [redacted] | | 00:01:21 | 0.00 |
| | | | | | **Carried over** | **0.00** |

swisscom

| | |
|---|---|
| Month | 01.03.16 - 31.03.16 |
| Phone number | [redacted] |

## Intra company: Telephony, Continued

| Date | Time | Service | Target number | Connection destination , Tariff | Duration/quantity/KB | Amount |
|---|---|---|---|---|---|---|
| | | | | | **Carried over** | **0.00** |
| 15.03.16 | 20:10:42 | Calls within the company | [redacted] | | 00:04:52 | 0.00 |
| 16.03.16 | 17:14:58 | Calls within the company | [redacted] | | 00:00:44 | 0.00 |
| 17.03.16 | 17:04:31 | Calls within the company | [redacted] | | 00:01:57 | 0.00 |
| 17.03.16 | 19:08:08 | Calls within the company | [redacted] | | 00:01:00 | 0.00 |
| 17.03.16 | 19:31:42 | Calls within the company | [redacted] | | 00:00:32 | 0.00 |
| 17.03.16 | 19:42:48 | Calls within the company | [redacted] | | 00:02:52 | 0.00 |
| 19.03.16 | 20:23:01 | Calls within the company | [redacted] | | 00:00:02 | 0.00 |
| 21.03.16 | 12:12:05 | Calls within the company | [redacted] | | 00:00:43 | 0.00 |
| 21.03.16 | 16:02:07 | Calls within the company | [redacted] | | 00:00:04 | 0.00 |
| 22.03.16 | 19:59:34 | Calls within the company | [redacted] | | 00:00:44 | 0.00 |
| 22.03.16 | 20:07:48 | Calls within the company | [redacted] | | 00:00:05 | 0.00 |
| 23.03.16 | 13:46:44 | Calls within the company | [redacted] | | 00:00:53 | 0.00 |
| | | | | | Total | 0.00 |

## Outgoing abroad: Telephony

| Date | Time | Service | Target number | Connection destination , Tariff | Duration/quantity/KB | Amount |
|---|---|---|---|---|---|---|
| 29.03.16 | 11:54:08 | Telephony outgoing zone Global, included | [redacted] | | 00:01:55 | 0.00 |
| | | | | | Total | 0.00 |

## Outgoing abroad: Data

| Date | Time | Service | Target number | Connection destination , Tariff | Duration/quantity/KB | Amount |
|---|---|---|---|---|---|---|
| 11.03.16 | 19:26:33 | Data in zone Europe, included | --- | | 189.0 | 0.00 |
| 11.03.16 | 19:30:14 | Data in zone Europe, included | --- | | 40.0 | 0.00 |
| 11.03.16 | 19:41:05 | Data in zone Europe, included | --- | | 283.0 | 0.00 |
| 11.03.16 | 19:45:37 | Data in zone Europe, included | --- | | 273689.0 | 0.00 |
| 11.03.16 | 21:35:55 | Data in zone Europe, included | --- | | 83.0 | 0.00 |
| 11.03.16 | 21:37:36 | Data in zone Europe, included | --- | | 97686.0 | 0.00 |
| 25.03.16 | 01:11:52 | Data in zone Global, included | --- | | 172.0 | 0.00 |
| 25.03.16 | 01:12:36 | Data in zone Global, included | --- | | 2312.0 | 0.00 |
| 25.03.16 | 02:06:44 | Data in zone Global, included | --- | | 35.0 | 0.00 |
| 25.03.16 | 02:07:35 | Data in zone Global, included | --- | | 12309.0 | 0.00 |
| 25.03.16 | 05:58:00 | Data in zone Global, included | --- | | 49.0 | 0.00 |
| 25.03.16 | 13:20:29 | Data in zone Global, included | --- | | 3072.0 | 0.00 |
| 25.03.16 | 20:04:10 | Data in zone Global, included | --- | | 99.0 | 0.00 |
| 25.03.16 | 22:18:42 | Data in zone Global, included | --- | | 2223.0 | 0.00 |
| | | | | | **Carried over** | **0.00** |

**Please turn over >**

## Outgoing abroad: Data, Continued

| Date | Time | Service | Target number | Connection destination , Tariff | Duration/quantity/KB | Amount |
|---|---|---|---|---|---|---|
| | | | | | **Carried over** | **0.00** |
| 25.03.16 | 22:29:01 | Data in zone Global, included | --- | | 23.0 | 0.00 |
| 25.03.16 | 22:39:21 | Data in zone Global, included | --- | | 1307.0 | 0.00 |
| 25.03.16 | 23:00:01 | Data in zone Global, included | --- | | 11.0 | 0.00 |
| 26.03.16 | 00:33:03 | Data in zone Global, included | --- | | 1399.0 | 0.00 |
| 26.03.16 | 07:27:24 | Data in zone Global, included | --- | | 5984.0 | 0.00 |
| 26.03.16 | 15:24:13 | Data in zone Global, included | --- | | 492.0 | 0.00 |
| 27.03.16 | 04:43:12 | Data in zone Global, included | --- | | 1669.0 | 0.00 |
| 27.03.16 | 12:10:45 | Data in zone Global, included | --- | | 1297.0 | 0.00 |
| 27.03.16 | 12:32:12 | Data in zone Global, included | --- | | 371.0 | 0.00 |
| 27.03.16 | 18:17:10 | Data in zone Global, included | --- | | | 0.00 |
| 28.03.16 | 05:00:49 | Data in zone Global, included | --- | | 1948.0 | 0.00 |
| 29.03.16 | 04:20:15 | Data in zone Global, included | --- | | 1244.0 | 0.00 |
| 29.03.16 | 08:06:41 | Data in zone Global, included | --- | | 2159.0 | 0.00 |
| 29.03.16 | 10:00:09 | Data in zone Global, included | --- | | 9470.0 | 0.00 |
| 29.03.16 | 11:17:50 | Data in zone Global, included | --- | | 10376.0 | 0.00 |
| 29.03.16 | 13:20:02 | Data in zone Global, included | --- | | 127.0 | 0.00 |
| 30.03.16 | 04:36:33 | Data in zone Global, included | --- | | 6920.0 | 0.00 |
| 30.03.16 | 09:29:43 | Data in zone Global, included | --- | | 8333.0 | 0.00 |
| 31.03.16 | 03:59:44 | Data in zone Global, included | --- | | 9704.0 | 0.00 |
| 31.03.16 | 09:22:15 | Data in zone Global, included | --- | | 436.0 | 0.00 |
| 31.03.16 | 09:40:49 | Data in zone Global, included | --- | | 1439.0 | 0.00 |
| 31.03.16 | 09:58:50 | Data in zone Global, included | --- | | 454.0 | 0.00 |
| 31.03.16 | 10:37:16 | Data in zone Global, included | --- | | 139.0 | 0.00 |
| 31.03.16 | 11:43:38 | Data in zone Global, included | --- | | 5728.0 | 0.00 |
| 31.03.16 | 17:41:09 | Data in zone Global, included | --- | | 291.0 | 0.00 |
| 31.03.16 | 17:48:12 | Data in zone Global, included | --- | | 1859.0 | 0.00 |
| | | | | | Total | 0.00 |

[redacted]

**From:** [redacted]
**Sent:** 04 July 2016 11:58
**To:** Kevin Molloy
**Subject:** FW: Campaigning at the referendum on the UK's membership of the European Union CCM:0287057

---------- Original Message ----------
**From:** PEF Inbox
**Received:** 09/05/2016 15:56
**To:** Derek Vaughan MEP
**Subject:** Campaigning at the referendum on the UK's membership of the European Union

Dear Mr Vaughan,

## Rules on campaigning at the referendum on the UK's membership of the European Union

The Electoral Commission is an independent organisation set up by the UK Parliament. Our role includes monitoring and ensuring compliance with the rules on campaign spending at referendums.

We are aware that you are campaigning in the run-up to the EU referendum. I am writing to help you understand the rules on referendum campaigning, and how they may affect you and organisations you are involved with.

In the run up to a referendum, there is a formal campaigning period called the 'referendum period', during which the referendum campaign rules apply. The referendum period began on 15 April 2016 and ends on polling day. The rules apply to spending on certain campaigning activities that are intended to promote or bring about a particular outcome in the referendum – see our guidance for more details.

You cannot spend more than £10,000 on campaigning for an outcome without registering with us. This includes spending incurred before the referendum period begins, if the campaigning itself takes place during the referendum period – for example leaflets which were printed before the referendum period but distributed during it. See page 7 of this guidance for a list of organisations and individuals who are eligible to register as a campaigner.

Once registered, campaigners are also subject to rules over the donations and loans they receive – see this guidance for more details.

From the leaflets we have seen it seems that the spending may have been incurred by the S&D Group in the European Parliament, although your details also appear, as well as the branding of the European Parliamentary Labour Party.

Since the S&D Group is not a UK-based organisation, it is unable to register as a campaigner. This means that the S&D Group must not spend over £10,000 on campaigning during the referendum period, including on material produced before the referendum period but used during it.

Could you please confirm:

a) which organisation or individual is responsible for the spending; and

b) how much money has been spent on activities promoting an outcome taking place during the referendum period.

I would be grateful if you would let us know the answers to these questions by 3pm on Monday 16 May 2016. If have any queries, or if you would like more time to produce the answers, please get in touch on 0333 103 1928 or at pef@electoralcommission.org.uk.

Kind regards,

**Sam Nicholson**
**Guidance Adviser**
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
Tel: 020 7271 0[redacted]
Fax: 020 7271 0505
www.electoralcommission.org.uk

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[redacted]

**From:** Kevin Molloy
**Sent:** 04 July 2016 12:00
**To:** Kevin Molloy
**Subject:** FW: S&D Group leaflet CCM:0237087
**Attachments:** S&D Leaflet.pdf

---------- Original Message ----------
**From:** PEF Inbox
**Received:** 12/05/2016 15:43
**To:** Stephen Pearse
**Subject:** S&D Group leaflet CCM:0237087

Dear Stephen,

Thank you for your call earlier concerning the leaflets which prompted us to contact Derek Vaughan MEP.

I attach a picture of the leaflet we discussed. As I said on the phone, the imprint says that the leaflets were printed in October 2015. However, we have received information that suggests that this particular leaflet appears to have been distributed by hand more recently.

Can you please confirm, providing evidence if possible:

- who paid for the leaflets;
- how much they cost;
- the geographical area in which the leaflets were distributed;
- by whom (organisation or individual) the leaflets were distributed;
- when the leaflets were distributed;
- and in particular how many leaflets were distributed in the referendum period which began on 15 April 2016.

I would be grateful if you could provide this information by next Thursday, although I know you said you will be out of the office for some days now. If you would like more time, or if you have any questions, please get back in touch.

Kind regards,

Sam
**Sam Nicholson**
**Guidance Adviser**
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
Tel: 020 7271[redacted]
Fax: 020 7271 0505
www.electoralcommission.org.uk

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[redacted]

**From:** Kevin Molloy
**Sent:** 04 July 2016 12:04
**To:** Kevin Molloy
**Subject:** FW: RE: EU referendum leaflet CCM:0287058
**Attachments:** image001.jpg

---------- Original Message ----------
**From:** PEF Inbox
**Received:** 15/06/2016 16:37
**To:** Stephen Pearse
**Subject:** RE: EU referendum leaflet

Dear Stephen,

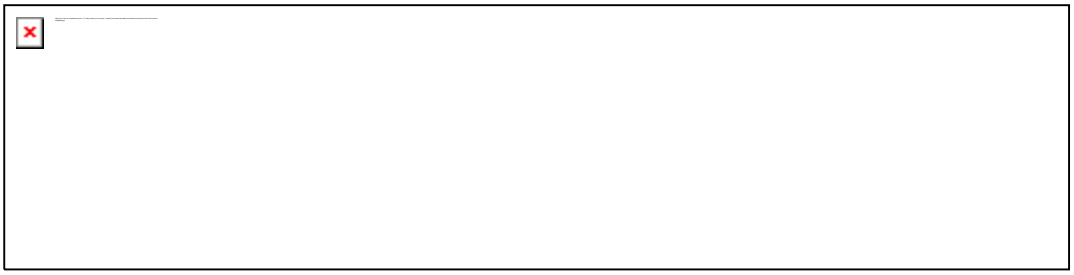
Thank you for your quick response.

Best wishes,

Sam
**Sam Nicholson**
**Guidance Adviser**
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
Tel: 020 7271 [redacted]
Fax: 020 7271 0505
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**From:** [redacted]@europarl.europa.eu]
**Sent:** 15 June 2016 16:34
**To:** PEF Inbox
**Subject:** RE: EU referendum leaflet

Dear Sam

Thank you for your email.

The British Delegation of the S&D Group has not produced any materials referencing the referendum or advocating a vote to remain in the EU. However, given that the Electoral Commission is taking a very broad assessment with regards to what would constitute campaign material, I have included below the costs of anything that we have funded that could conceivably be distributed/have been distributed during the referendum campaign period.

These materials are not necessarily similar in nature to the South West leaflets, but for the sake of completeness I have included the cost of all and any materials that could conceivably be considered to be relevant to the referendum and that could potentially be distributed during the referendum campaign.

As discussed on the phone, it is very likely that the costs of materials distributed during the referendum period will be lower than the figures below, as not all the leaflets will have been distributed during the referendum period. However, since even these figures are well below the £10,000 threshold, it seems easiest to give the totals for the full cost of production of everything that has been produced:

Various leaflets for South West of England: £1797
Employment rights leaflets produced for use in Wales: £2894
Various MEP information leaflets for Yorkshire and the Humber: £1005

Total: £5696

I hope that this answers your questions. Please let me know if you have any further questions.

Kind regards

Stephen

---

**From:** PEF Inbox [mailto:PEF@electoralcommission.org.uk]
**Sent:** 13 June 2016 16:36
**To:** PEARSE Stephen [redacted]@europarl.europa.eu>
**Subject:** RE: EU referendum leaflet

Dear Stephen,

Thank you for your email and your clarifications.

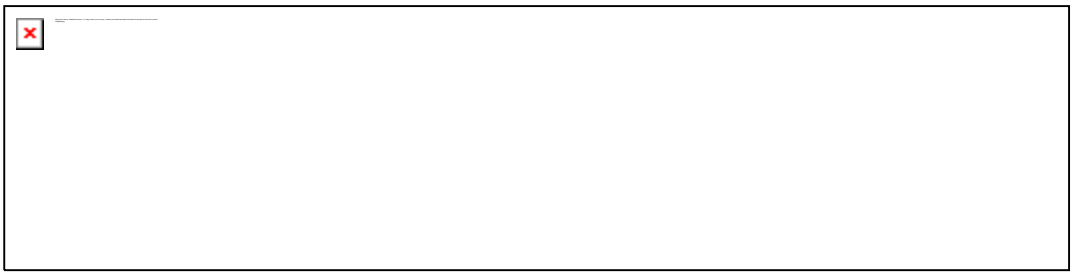
Can you please confirm where else in the UK and Gibraltar the British Delegation of the S&D Group has sent out similar leaflets that could have been distributed in the regulated period, and how much they cost?

Kind regards,

Sam
**Sam Nicholson**
**Guidance Adviser**
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
Tel: 020 7271 0527
Fax: 020 7271 0505
www.electoralcommission.org.uk

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**From:** [redacted]europarl.europa.eu]
**Sent:** 10 June 2016 12:39
**To:** PEF Inbox; [redacted]@claremoodymep.com
**Cc:** [redacted]
[redacted] leaflet

Dear Sam

Many thanks for your email concerning information leaflets promoting Clare Moody MEP in Dorset.

The leaflet was funded by the British Delegation of the S&D Group in the European Parliament (also known as the European Parliamentary Labour Party).

Similar leaflets were produced for other parts of the South West region.

The leaflets were not produced specifically for the referendum and are intended to have a longer lifespan than the referendum period. Some were distributed before the start of the official campaign period and not all the leaflets have been distributed.

However, for the sake of completeness, the full figure for the production of these leaflets that could potentially have been distributed during the referendum period is £1,797.

I can also confirm that our total expenditure as an organisation on these and any other materials used in the UK and Gibraltar during the referendum period will be below the £10,000 campaign spending threshold.

If you have any further questions please do not hesitate to contact me.

Yours sincerely

Stephen Pearse
General Secretary
European Parliamentary Labour Party
British Delegation of the S&D Group in the European Parliament

---

**From:** PEF Inbox [PEF@electoralcommission.org.uk]
**Sent:** Wednesday 8 June 2016 10:36

**To:** [redacted]@claremoodymep.com
**Subject:** EU referendum leaflet

Dear Ms Moody and Mr Pearse,

We have been made aware of the attached leaflet which was handed out by Labour activists on 4 June 2016.

The imprint states that the leaflets were printed in April. As you are aware, the period during which spending on referendum material is regulated began on 15 April 2016. Irrespective of when they were printed, any leaflets used during the regulated period will fall under the spending rules (see guidance for more details).

Can you please confirm:

- how much money was spent on the leaflets;
- how many of the leaflets have been or will be distributed during the regulated period;
- which individual or organisation is responsible for the spending; and
- whether there are other similar leaflets for other areas in the South West or elsewhere in the UK or Gibraltar, and if so how much money was spent on those.

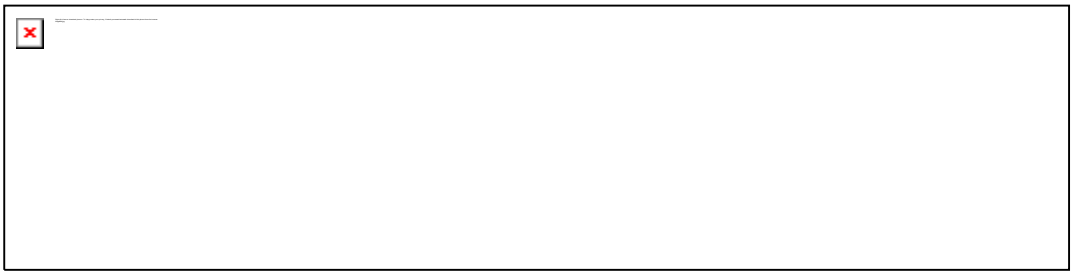
It would be helpful if you could let us know the answers as soon as possible.

Kind regards,

**Sam Nicholson**
**Guidance Adviser**
The Electoral Commission
3 Bunhill Row
London EC1Y [redacted]
Tel: 020 7271 0527
Fax: 020 7271 0505
www.electoralcommission.org.uk

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[redacted]

**From:** Kevin Molloy
**Sent:** 01 July 2016 13:05
**To:** Kevin Molloy
**Subject:** FW: World Economic Forum - enquiry CCM:0287056
**Attachments:** image001.jpg

---------- Original Message ----------
**From:** James Douglas
**Received:** 27/04/2016 11:44
**To:** Lucy Smith
**Subject:** FW: World Economic Forum - enquiry

Dear Lucy,

Thanks for this information.

Any individual or organisation can spend up to £10,000 on referendum spending. You must not spend more than £10,000 on referendum spending during the referendum period unless you have registered with us as a 'registered campaigner'. If you do, you may commit an offence. Our guidance explains who can register and how to register. If you are a Swiss registered organisation you are not eligible to register with us.

Before the referendum, there is a formal campaigning period called the 'referendum period.' During this period, there are rules and spending limits that apply to certain activities. The referendum period started on 15 April 2016 and ends on 23 June 2016.

Referendum spending is expenditure on certain campaigning activities that are intended to or are otherwise in connection with, promoting or bringing about a particular outcome in the referendum.

Spending on events that are intended to, or are otherwise in connection with, promoting or bringing about a particular outcome in the referendum will be referendum spending. So if your organisation holds an event that invites a politician or business or sector leader that supports one side of the outcome to speak about the referendum and the impact of the vote, this is highly likely to be regulated activity. David Cameron is, of course, a very prominent supporter of a Remain outcome. Less likely to be regulated is an event that offers equal time to speakers of similar stature.

You should also think about the audience of the event. Events for discussion with fellow businesses and academics are less likely to be regulated. However, if this is available to the wider public, by webcast or video, this is more likely to be regulated given its availability to voters.

I hope this is helpful. If we can be of any further assistance, please don't hesitate to contact us on pef@electoralcommission.org.uk, or by phone on 0333 103 1928.

Kind regards,
James

**James Douglas**
**Guidance Adviser**
The Electoral Commission

3 Bunhill Row
London
EC1Y 8YZ
Tel: 020 7271 0[redacted]
Fax: 020 7271 0[redacted]
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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---

**From:** [redacted]@weforum.org]
**Sent:** 26 April 2016 11:27
**To:** James Douglas
**Cc:** Martina Larkin
**Subject:** RE: World Economic Forum - enquiry
**Importance:** High

Dear James,

Many thanks for your email.

The audience will be primarily UK business (top level CEO's) as well as leaders of global companies, there will also be representatives of youth communities of the Forum and the total number of participants will be 160 people.

Media options are being decided at the moment whether it is webcast or filmed, could you please let me know the implications of each ?

Many thanks for your help,
Kind regards,
Lucy

**Lucy Smith**
Community Specialist
Europe and Eurasia Team

**World Economic Forum**
91-93 Route de la Capite, Cologny Geneva CH1223 Switzerland
[redacted]

---

**From:** [redacted]@electoralcommission.org.uk]
**Sent:** 26 April 2016 12:13
**To:** Lucy Smith
**Subject:** FW: World Economic Forum - enquiry

Dear Lucy,

Thanks for your email. Sorry for the delay in responding.

I have had a look at the information you have sent over. I would be grateful for some more details about the intended audience for the session – those in the room (will this be primarily UK businesses, or a more international audience) - and whether this will be made more widely available (for example, by streaming the session or making video, transcripts available on your website, etc.). Will media be in attendance?

I am in and out of the office today, but if you can provide some more information by email I will compile some advice for you shortly.

Kind regards,
James

---

**From:** [redacted]@weforum.org]
**Sent:** 26 April 2016 08:57
**To:** James Douglas
**Subject:** RE: World Economic Forum - enquiry

Dear James,

Can you please let me know which time is suitable for me to contact you today ?

With thanks and kind regards,
Lucy

---

**From:** Lucy Smith
**Sent:** 22 April 2016 13:38
**To:** 'James Douglas'
**Subject:** RE: World Economic Forum - enquiry

Dear James,

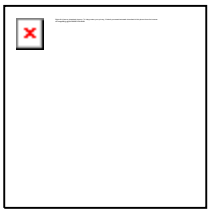
Many thanks for your email, please find attached our 2 pager with further information about our event.

In advance thanks for letting me know your comments at your earliest convenience!

With thanks and kind regards,
Lucy

**Lucy Smith**
Community Specialist
Europe and Eurasia Team

**World Economic Forum**
91-93 Route de la Capite, Cologny Geneva CH1223 Switzerland
T [redacted]



**From:** [redacted]@electoralcommission.org.uk]
**Sent:** 21 April 2016 18:22
**To:** Lucy Smith
**Subject:** FW: World Economic Forum - enquiry

Dear Lucy,

Thanks for your email.

I'm not sure who you spoke to earlier – I'm sorry if you'll be repeating yourself, but the implications will very much depend on the specifics of the event. Can you give me some more details about the event (theme, format etc.), or give me a call on Friday to discuss this further?

Kind regards,
James

**James Douglas**
**Guidance Adviser**
The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ
Tel: 020 7271 [redacted]
Fax: 020 7271 0665
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

**Putting voters first**

Please consider the environment before printing this email.

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**From:** [redacted]@weforum.org]
**Sent:** 21 April 2016 10:03
**To:** infoengland
**Subject:** World Economic Forum - enquiry
**Importance:** High

Dear Sir,

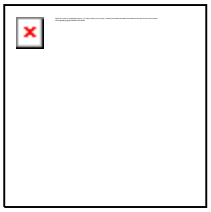
Many thanks for our call this morning, as discussed, we are hosting an event in London in May with senior cabinet ministers.

Could you kindly inform me what the implications are for our event, should there be any.

With thanks and kind regards,
Lucy Smith

**Lucy Smith**
Community Specialist
Europe and Eurasia Team

**World Economic Forum**
91-93 Route de la Capite, Cologny Geneva CH1223 Switzerland
[redacted]



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[redacted]

**From:** [redacted]@weforum.org>
**Sent:** 10 May 2016 11:35
**To:** Lucy Smith
**Subject:** FW: AV/WIFI Costs

---

**From:** [redacted]@cityoflondon.gov.uk]
**Sent:** 29 April 2016 18:23
**To:** [redacted]
**Subject:** RE: AV/WIFI Costs

Thank you Sophie!

Have a lovely weekend as well.

Kind regards

Jay

Jay Patel
**Executive Officer - Overseas and Domestic Programmes**
Office of The Rt. Hon The Lord Mayor
Mansion House, EC4N 8BH
[redacted]
www.cityoflondon.gov.uk/lordmayor

---

**From:** [redacted]weforum.org]
**Sent:** 29 April 2016 17:22
**To:** Patel, Jay
**Cc:** Garrigan, Wayne
**Subject:** Re: AV/WIFI Costs

Dear Jay,

Thanks a lot for the call this morning, very useful!

And thanks for the below costs, I'll run that through with Martina and will get back to you next week!

Enjoy your long week end, hopefully the sun comes out!

Best,
Sophie

On 29 Apr 2016, at 17:02, Patel, Jay [redacted]@cityoflondon.gov.uk> wrote:

> Dear Sophie
>
> Good to speak to this morning.
>
> Please find below information for AV and WIFI set-up:

**AV**

£350.00 per day  to cover MH Sound Engineering needs regardless of timings, they will be fully committed to your event.

The SM58 Beta Hand-Held Mics or Shure Radio Lapel Mics would be charged at £60.00 per channel for the entire event.

They have checked the radio equipment availability which is fine at present for the 16-17th May.

**WIFI**

For a one day event the cost is £1,350 plus VAT.

This includes set-up in the Old Ballroom and Egyptian Hall, configuration, on-site engineers(s) and post event take-down.

If  you would like to proceed then please let me know as soon as or have further questions.

Kind regards

Jay

Jay Patel
**Executive Officer - Overseas and Domestic Programmes**
[redacted]
www.cityoflondon.gov.uk/lordmayor

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[redacted]

**From:** Sophie Izard <Sophie.Izard@weforum.org>
**Sent:** 10 May 2016 11:35
**To:** Lucy Smith
**Subject:** FW: Event enquiry - 17 May 2016

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**From:** Rout, Adam [mailto:Adam.Rout@cityoflondon.gov.uk]
**Sent:** 17 March 2016 11:41
**To:** Sophie Izard
**Subject:** RE: Event enquiry - 17 May 2016

Sophie

Below are the outline costs to cover staffing, security and other running costs and quotes from our caterers for the refreshments. My colleagues have also asked about the audio visual requirements and I include their questions below. One protocol matter also needs to be raised at this stage; As the Mansion House is the principally the private residence of the Lord Mayor of London, there is a need for him to be at events in his 'house' (either partly or wholly) and to welcome guests to events held here. In essence, can a short introduction by the Lord Mayor be included at the start of the event? I understand that Professor Schwab has been involved with events held at City of London Corporation venues, so I doubt this will seem unusual to him.

In terms of the format we see the event for 200 pax taking place on the first floor of the House with the event for 50 pax happening on the second floor. Assuming that we proceed, we think that it is essential that the team organising this event come over to the Mansion House so that we can talk things through and confirm all the arrangements. We could also begin the set-up at 6pm on 16th May.

The date has been reserved in our diary so if everything else I have outlined is ok we can confirm this. Please get in touch if you need to discuss further at this stage.

Best regards

Adam

AV points/questions:

Do they want us to appoint and manage a supplier or will they bring in their own?
How much staging/what type is needed?
What type of microphones will be needed (e.g. roaming/set/lapel)? – we can supply depending on set up and agenda of speakers
Will screens for presentations be needed, if so what type?
If Mansion House are running, a sound engineer will be needed.

**Press/Media** - Assume they will be at the event, will they need staging and possible spot lights or increased lighting?

Costs

- Staffing, security and other running costs - £5,000
- AV – a quote can be provided if you want Mansion House to arrange the supplier.
- Catering:

200 pax event

Welcome Tea/Coffee and water - £3.35 per person

Finger food buffet - £15.40 per person ( 4 items per person)
Or
£23.40 per person ( 6 items per person)

Juices - £4.90 per litre (on consumption)
Bottled water - £3.30 per litre bottle

All prices exclude VAT

50 pax event

Welcome Tea/Coffee and water - £3.35 per person

2 course Hot Standing Buffet - £26.20 per person

Juices - £4.90 per litre (on consumption)
Bottled water - £3.30 per litre

All prices exclude VAT

Extras:
- Table cloths for break out rooms and tables (if any in EH) - £4.50 per cloth used ex VAT

---

**From:** [redacted]@weforum.org]
**Sent:** 16 March 2016 16:50
**To:** Rout, Adam
**Subject:** RE: Event enquiry - 17 May 2016

Yes Adam, this is correct.
Thank you,
Sophie

---

**From:** [redacted]@cityoflondon.gov.uk]
**Sent:** 16 March 2016 17:46
**To:** Sophie Izard
**Subject:** RE: Event enquiry - 17 May 2016

Sophie

Thanks. This appears to indicate two separate events, one for 200 pax and one for 50 pax, happening at the same time, is that correct?

Adam

---

**From:** [redacted]@weforum.org]
**Sent:** 16 March 2016 16:39
**To:** Rout, Adam
**Subject:** FW: Event enquiry - 17 May 2016

Dear Adam,

Following our discussion, I am pleased to share with you our revised schedule and requirements for our meeting on Tuesday 17 May 2016.

I truly appreciate your help and support in getting this booking confirmed at your earliest suitability. As you know we are working together with Number 10 in order to send out the invitations as soon as possible .

| Timing | | Set up | Catering | AV |
|---|---|---|---|---|
| as of 10 am | Registration Opens | a registration desk (2 rectangular tables) | welcome coffee - 200 pax | n/a |
| 10.30 - 12.00 | Morning Session | theatre style - 200 pax | n/a | microphon |
| 12.00 - 12.30 | Networking | High tables | n/a | n/a |
| 12.30 - 13.00 | Standing Lunch | High tables and finger food buffet - 200 pax | Finger Food Buffet – 200 pax | n/a |
| 13.00 - 14.00 | Afternoon Session 1 | Breakout groups (4 circles of 50 chairs) | n/a | microphon |
| 14.00 - 15.00 | Afternoon Session 2 | theatre style - 200 pax (the participants will just turn their seats around to face the speaker) | n/a | microphon |

| Timing | | Set up | Catering | AV |
|---|---|---|---|---|
| as of 10 am | Registration Opens | a registration desk (2 rectangular tables) | welcome coffee - 50 pax | n/a |
| 10.30 - 12.00 | Morning Session | theatre style - 50 pax | n/a | microphon |
| 12.00 - 13.00 | Standing Lunch | buffet buffet - 50 pax | Buffet Lunch or standing lunch - 50 pax | n/a |
| 13.00 - 15.00 | Afternoon Session | theatre style - 50 pax | n/a | microphon |

Please do not hesitate to reach out to me at any time should you have any questions or require clarity on some areas.
Once again, I thank you for your consideration.

With best regards,
Sophie

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**From:** Sophie Izard
**Sent:** 14 March 2016 11:59
**To:** [redacted]@cityoflondon.gov.uk'
**Subject:** Event enquiry - 17 May 2016

Dear Sophie,

Following our call earlier this morning, please find below my request.

I am working closely with Kate Shouesmith from Number 10 and Tanya Milberg, World Economic Forum, regarding an upcoming event on May 17 with key senior cabinet officials.
The event is planned to start around 9 am and finish around 3 or 4 pm. Please find hereafter a first draft of the requirements:

- a registration area/desk
- 1 plenary room, theatre style 200 pax
- 1 networking room for standing meeting, some high tables for 200 pax

- 1 room for a seated lunch for 200 pax
- 1 meeting room theatre style for 50 pax
- 1 – 2 small rooms for 4 to 6 pax

I hope this is sufficient information, please do not hesitate to contact me should you have any further questions. Also, could you please let me know when I could expect an answer from your side?

With my best regards,
Sophie

Sophie Izard
Specialist, Event Management
World Economic Forum
www.weforum.org
[redacted]

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[redacted]

**From:** [redacted]@weforum.org>
**Sent:** 10 May 2016 11:53
**To:** [redacted]
**Subject:** FW: Costs for printing badges

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**From:** [redacted]
**Sent:** 10 May 2016 12:52
**To:** [redacted]
**Subject:** RE: Costs for printing badges

Dear Carolina,

Including lanyard (necklace), approx. price is 1.50 CHF per badge.

Best regards,

Philip
Participant Services Team

World Economic Forum
91-93 route de la Capite
CH-1223 Cologny/Geneva
[redacted]

**General Enquires : participantservices@weforum.org**
**Annual Meeting (Davos) – AnnualMeeting@weforum.org**
**World Economic Forum on ASEAN – ASEAN@weforum.org**
**World Economic Forum on Latin America – LatinAmerica@weforum.org**
**World Economic Forum on Africa – Africa@weforum.org**
**Annual Meeting of the New Champions – NewChampions@weforum.org**
**India Economic Summit – India@weforum.org**
**Summit on the Global Agenda – GACSummit@weforum.org**

Visit our website at http://www.weforum.org

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**From:** [redacted]
**Subject:** Costs for printing badges

Dear Philip,

As per our phone conversation earlier, can you please confirm in writing the costs related to a badge (cost price per item, including printing & the 'necklace').

Thank you in advance!
Carolina

---
[redacted]

Specialist, Event Management

**World Economic Forum** | 91-93 Route de la Capite | Cologny/Geneva CH-1223, Switzerland
[redacted]