

Lorne Gibson
Elections Commissioner
Office of the Election Commissioner
Suite 805, 10011 109 Street NW
Edmonton, Alberta T5J 3S8

August 22, 2018

Dear Mr. Gibson,

I am writing to you with concern over the recent deregistration of two political action groups with deep ties to the United Conservative Party.

Given that both of these special interest groups -- *Alberta Can't Wait*, and *Project Wilberforce* -- are actively engaged in political work on behalf of the UCP, their deregistration appears to violate one key section of the *Elections Finance and Contribution Disclosure Act* (EFCDA).

Section 44.1(1.3) of the EFCDA clearly states that "Political advertising" includes work such as canvassing and organizing work that's done on behalf of a registered party.

Moreover, Section 41.41(1) of the EFCDA forbids all third parties - whether registered or not - from engaging in any political work that should be done by a registered party themselves. *That includes selling memberships on their behalf.*

In the attached appendix, we provide evidence that both of these organizations are engaged in work forbidden by unregistered third parties under these statutes. Further, *Project Wilberforce* appears to be selling memberships on behalf of the UCP, which is forbidden regardless of registration status.

For too long, Albertans had no idea who was spending money trying to influence their elections, operating with impunity behind closed doors.

The EFCDA changed that -- a major step forward for our democracy.

Given the evidence contained here, I am requesting that you urgently look into this matter to ensure that UCP allies *Alberta Can't Wait* and *Project Wilberforce* are not sidestepping the law.

Thank you,

Roari Richardson
Provincial Secretary
Alberta's New Democrats

Appendix A:

Section 44.1(1.3) of EFCDA clearly states that:

“political advertising” includes (a) canvassing for the benefit of a registered party, the leader of a registered party, a member of the Legislative Assembly, a registered nomination contestant, a registered leadership contestant or a registered candidate, and (b) organizing events where a significant purpose of the event is to promote or oppose a registered party, the leader of a registered party, a member of the Legislative Assembly, a registered nomination contestant, a registered leadership contestant or a registered candidate.

Section 41.41(1) of the EFCDA is also clear about what types of activities third parties are allowed to engage in. This section notes:

A third party shall not incur expenses to engage in any of the following activities that support the work of registered parties, registered candidates, registered nomination contestants or registered leadership contestants: (a) selling memberships for a registered party; (b) fundraising for a registered party, registered candidate, registered leadership contestant or registered nomination contestant; (c) collecting or compiling information about electors or potential electors, including data and lists, where that information is shared with registered parties, registered candidates, registered leadership contestants or registered nomination contestants; (d) any other activity that would otherwise be part of the administrative activity of a registered party, registered candidate, registered nomination contestant or registered leadership contestant.

Appendix B:

Alberta Can't Wait's Mission Statement:

“Today, having seen through our mission of a credible conservative alternative, Alberta Can't Wait is focused on ensuring a UCP government forms government in 2019.”

http://www.albertacantwait.com/what_is_acw

Membership Drive email from the Wilberforce Project

From: Stephanie Fennelly, The Wilberforce Project <ed@twp.life> Sent: Friday, April 13, 2018 12:39 PM To: Subject: UCP Membership Deadline - TONIGHT!

Hi ,

Reminder that today is the last day to get a United Conservative Party (UCP) membership!

If you want a voice to support pro-life policies, vote for pro-life Board of Directors, and help nominate pro-life candidates into the UCP party, you will need to purchase your \$10 membership by 11:59pm today.

These steps are VITALLY important to creating a future law to protect pre-born children in Alberta. Please click here to purchase your \$10 membership now:

<https://www.unitedconservative.ca/Membership>

Once you have your membership, we will provide you with more information about the policy survey and the upcoming AGM opportunities.

Thank you for stepping up adding your voice to the UCP membership.

Kindly,

Stephanie

Executive Director

The Wilberforce Project

Stephanie Fennelly

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The Wilberforce Project · Canada This email was sent . To stop receiving emails, click here.

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