

Party Expenses Return for the 2020 General Election

DECLARATION

1. Party name:

New Zealand Democratic Party for Social Credit Incorporated

Party secretary name:

Anne Leitch

2. ELECTION EXPENSES LIMIT FOR THE PARTY

Did you contest the party vote?
Answer YES or NO

YES

'YES' =
\$1,199,000

\$ 1,199,000.00

Number of electorate candidates
for the party

19

Number
\$28,200

\$ 535,800.00

Expenditure limit (incl GST)

Total

\$ 1,734,800.00

3. TOTAL PARTY ELECTION EXPENSES

Part A: Party advertisements promoted solely by the party

\$ 12,013.61

Part B: Party advertisements shared with candidates
or other parties

\$ 4,785.42

Part C: Authorised party advertisements promoted by
third parties

\$ 0.00

Total (A + B + C)

\$ 16,799.03

4. PARTY BROADCASTING ALLOCATION

TOTAL ALLOCATION TO THE PARTY:

53840.00

WRITE 'NIL' if the party did not receive a broadcasting
allocation under the Broadcasting Act

5. TOTAL PARTY ALLOCATION EXPENSES

Part D: Party only allocation expenses

\$ 53,840.00

Part E: Party and candidate shared allocation expenses

\$ 0.00

Part F: Candidate only allocation expenses

\$ 0.00

Total (D + E + F)

\$ 53,840.00

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6. I declare that to the best of my knowledge this return, filed pursuant to sections 206I and 206IA of the Electoral Act 1993, is an accurate record of the party's election expenses and the party's allocation expenses for the 2020 general election, and any allocation received has only been used for purposes permitted under section 80A of the Broadcasting Act 1989.

SIGNATURE

AW Leitch

DATE: DD / MM / YYYY

16/03/2021

COMPLETING THE RETURN

You can complete the return electronically or by hand. If you complete the form electronically each part will be automatically added up for you, as well as the totals on this page of the return.

For information on types of electronic signatures that the Commission accepts, please see the **How to Complete Your Party Return Form** instruction sheet.

CHECKLIST

Steps 1, 2 and 4 completed on this page



Parts A to C (step 3) completed



Parts D to F (step 5) completed if party received a broadcasting allocation



Party secretary signed and dated the return



All relevant supporting documentation supplied to auditor



Auditor stamped or initialled a copy of the return to keep for own records



Auditor's report enclosed



Representation letter enclosed, if used



FILING THE RETURN

The return must be received by the Electoral Commission by **5pm, 17 March 2021** (within 90 working days of election day). A party secretary who fails to comply with these requirements commits an offence and may be referred to the Police.

The return can be filed:

- by post to PO Box 3220, Wellington 6140
- delivered to Level 4, 34-42 Manners Street, Wellington
- by email to: enquiries@elections.govt.nz

Reminder: the returns are open to public inspection and will be published on www.elections.nz.

Further information on party expenses is available in the **Party Secretary Handbook – General Election and Referendums 2020**.

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PRINT

PART A: PARTY ADVERTISEMENTS SOLELY PROMOTING THE PARTY

In this part you should record all election expenses incurred in relation to party advertisements published, or that continued to be published, during the regulated period for the general election (**18 August to 16 October 2020**) solely promoting the party.

For advertisements published both before and during the regulated period you should apportion the costs so that only a fair proportion of the expenses are attributed to being incurred during the regulated period. Only record the amount attributable to the regulated period in the return.

Disclose the total amount incurred on election advertisements published during the regulated period even if payment for the advertising was made outside of the regulated period.

Election and referendum expenses can't be apportioned. If you published advertising during the regulated period that promoted the party and one or

more referendum options, the full cost counts as a party election expense and a referendum expense. You only need to complete a referendum return if your party spends over \$100,000 on referendum advertising in respect of either referendum during the regulated period.

Election expenses include:


- the costs incurred in the preparation, design, composition, printing, postage and publication of the advertisement, and
- the reasonable market value of any material used or applied towards the advertisement provided to the party for free or below reasonable market value.

Further guidance is available in the **Party Secretary Handbook – General Election and Referendums 2020**.

WRITE 'NIL' IF YOU HAVE NO EXPENSES TO DECLARE HERE:

TOTAL FOR PART A

\$ 12,013.61

Item description Provide details of the type of advertisement, name of advertiser or supplier, volume, duration and size as appropriate	Value \$0.00 (inc GST)
EXAMPLE: Display Billboards Ltd: 22/09/2020 - 16/10/2020: 3 x Billboards: 2000mm x 1000mm	\$1,200
Jeff Oliver Print Ltd 1/09/2020 - 16/10/2020: 35000 x DLE leaflets	\$ 2,323.75
Raconda Ltd T/A Hot Printz Screen Printing: 64 x billboards 1200mm x 1200mm, 43 x billboards 800mm x 600mm	\$ 8,447.24
Mainfreight Ltd 24/08/2020 - 13/10/2020: Freight cost for billboards	\$ 1,242.62
	

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Item description

Provide details of the type of advertisement, name of advertiser or supplier,
volume, duration and size as appropriate

**Value \$0.00
(inc GST)**



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Item description

Provide details of the type of advertisement, name of advertiser or supplier,
volume, duration and size as appropriate

**Value \$0.00
(inc GST)**



aw

Item description

Provide details of the type of advertisement, name of advertiser or supplier,
volume, duration and size as appropriate

**Value \$0.00
(inc GST)**

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and

Item description

Provide details of the type of advertisement, name of advertiser or supplier,
volume, duration and size as appropriate

**Value \$0.00
(inc GST)**

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Item description

Provide details of the type of advertisement, name of advertiser or supplier,
volume, duration and size as appropriate

Value \$0.00
(inc GST)

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PART B: PARTY ADVERTISEMENTS SHARED WITH CANDIDATES OR OTHER PARTIES

In this part you should record all election expenses incurred in relation to election advertisements published, or that continued to be published, during the regulated period for the general election (18 August to 16 October 2020) promoting the party and one or more candidates or parties.

Apportionment is permitted between the party and a candidate(s) or other party(ies). Where an expense item has been apportioned between the party and candidate(s) or party(ies), record the total cost of the advertisement and the share apportioned to the party based on coverage. You should ensure there is a consistent description and approach to apportionment in each return of election expenses. Record the name of the candidate(s) or other party(ies) featured in the advertising in the item description.

Election and referendum expenses can't be apportioned. If you published advertising during the regulated period that promoted the party, one or more candidates and one or more referendum options, the total cost of the advertisement must also be counted separately as a referendum expense. You only need to complete a referendum return if your party spends over \$100,000 on referendum advertising in respect of either referendum during the regulated period.

For advertisements published both before and during the regulated period you should apportion the costs so that only a fair proportion of the expenses are attributed to being incurred during the regulated period. Only record the amount attributable to the regulated period in the return.

Disclose the total amount incurred on election advertisements published during the regulated period even if payment for the advertising was made outside of the regulated period.

Election expenses include:

- the costs incurred in the preparation, design, composition, printing, postage and publication of the advertisement, and
- the reasonable market value of any material used or applied towards the advertisement provided to the party for free or below reasonable market value.

Further guidance is available in the *Party Secretary Handbook – General Election and Referendums 2020*.

WRITE 'NIL' IF YOU HAVE NO EXPENSES TO DECLARE HERE:

TOTAL FOR PART B

\$ 4,785.42

Item description Provide details of the type of advertisement, name of advertiser or supplier, volume, duration and size as appropriate as well as name of candidate(s) and any other party featured in the advertising	Total cost (inc GST) Including preparation, design, composition, printing, publishing and postage	% apportioned as party expense	Value \$0.00 (inc GST)
EXAMPLE: Display Billboards Ltd: 22/09/2020 – 30/10/2020: 3 x billboards: 2000mm x 1000mm, Candidates: M Brown, Growth Party & T Smith, Neutral Party	\$6,000	20%	\$1,200
Raconda Ltd T/A Hot Printz Screen Printing: 8 x billboards 1200mm x 1200mm Candidate Amanda Vickers, Wellington Electorate (includes freight)	\$ 469.18	50%	\$ 234.59
Raconda Ltd T/A Hot Printz Screen Printing: 6 x billboards 1200mmx1200mm Candidate Brannon Favel, Rangitata Electorate (includes freight)	\$ 338.21	50%	\$ 169.11
Raconda Ltd T/A Hot Printz Screen Printing: 6 x billboards 1200mmx1200mm Candidate Callan Neylon	\$ 294.98	50%	\$ 147.49
Raconda Ltd T/A Hot Printz Screen Printing: 58 x billboards 2400mmx1200mm Candidate Chris Leitch	\$ 3,949.46	50%	\$ 1,974.73
Raconda Ltd T/A Hot Printz Screen Printing: 9 x billboards 2400mmx1200mm Candidate Cliff Hall (includes freight)	\$ 950.72	50%	\$ 475.36
Raconda Ltd T/A Hot Printz Screen Printing: 4 x billboards 1200mmx1200mm Candidate Deane Landreth (includes freight)	\$ 255.46	50%	\$ 127.73
Raconda Ltd T/A Hot Printz Screen Printing: 4 x billboards 2400mm-x200mm & 4x billboards 1200m-1200mm Candidate Jack Collin (includes freight)	\$ 802.06	50%	\$ 401.03
Raconda Ltd T/A Hot Printz Screen Printing: 4 x billboards 1200mmx1200mm Candidate John McCaskey (includes freight)	\$ 227.72	50%	\$ 113.86
Raconda Ltd T/A Hot Printz Screen Printing: 8 x billboards 1200mmx1200m & 6 x billboards 800mmx600mm Candidate Kath Lauderdale	\$ 592.19	50%	\$ 296.10
Raconda Ltd T/A Hot Printz Screen Printing: 6 x billboards 2400mmx1200mm Candidate Laurence McIsaac (includes freight)	\$ 683.16	50%	\$ 341.58
Raconda Ltd T/A Hot Printz Screen Printing: 4 x billboards 1200mmx 1200mm & 2 x billboards 800mmx600mm Candidate Lisa Er	\$ 196.65	50%	\$ 98.33
Raconda Ltd T/A Hot Printz Screen Printing: 6 x billboards 1200mmx1200mm Candidate Warren Voight (includes freight)	\$ 425.61	50%	\$ 212.81
Raconda Ltd T/A Hot Printz Screen Printing: 4 x billboards 1200mmx1200mm Candidate Winsome Aroha (includes freight)	\$ 287.10	50%	\$ 143.55
Raconda Ltd T/A Hot Printz Screen Printing: 2 x billboards 800mmx600mm Candidate Zariah Anjaiya-Winder (includes freight)	\$ 98.33	50%	\$ 49.17
			\$ 0.00
			\$ 0.00
			\$ 0.00

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PART C: AUTHORISED PARTY ADVERTISEMENTS PROMOTED BY A THIRD PARTY PROMOTER

In this part you should record all election expenses incurred in relation to party advertisements promoted by a third party promoter with your written authorisation and published, or that continued to be published, during the regulated period for the general election (18 August to 16 October 2020). Expenses cannot be apportioned with third party promoters. If you authorised someone else to publish advertising encouraging people to vote for the party, the cost of the advertising will be a party election expense and the same costs will also be an election expense of the third party. Record the name of the third party promoter in the item description.

Election and referendum expenses can't be apportioned. If a third party published advertising during the regulated period that promoted the party and one or more referendum options, the total cost of the advertisement must be counted separately as both a referendum expense and an election expense by both the party and the third party.

For advertisements published both before and during the regulated period you should apportion the costs so that only a fair proportion of the expenses are

attributed to being incurred during the regulated period. Only record the amount attributable to the regulated period in the return.

Disclose the total amount incurred on election advertisements published during the regulated period even if payment for the advertising was made outside of the regulated period.

Election expenses include:

- the costs incurred in the preparation, design, composition, printing, postage and publication of the advertisement, and
- the reasonable market value of any material used or applied towards the advertisement provided to the party for free or below reasonable market value.

Further guidance is available in the *Party Secretary Handbook – General Election and Referendums 2020*.

WRITE 'NIL' IF YOU HAVE NO EXPENSES TO DECLARE HERE:

NIL

TOTAL FOR PART C

\$ 0.00

Item description

Provide a brief description of the type of advertisement, name of advertiser or supplier, volume, duration and size as appropriate as well as the name of the third party which promoted the advertising

Value \$0.00
(inc GST)

EXAMPLE: Display Advertising Ltd: 1/06/2020 - 30/09/2020: 3 x Billboards: 2000mm x 1000mm
Worker's United

\$1,200

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Item description

Provide a brief description of the type of advertisement, name of advertiser or supplier, volume, duration and size as appropriate as well as the name of the third party which promoted the advertising

**Value \$0.00
(inc GST)**

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PART D: PARTY ONLY BROADCASTING ALLOCATION EXPENSES

You must complete Parts D to F if the party received an allocation of money for broadcasting pursuant to Part 6 of the Broadcasting Act 1989 to produce or place advertising on television, radio or the internet for the 2020 general election and referendums.

Advertising paid for using the broadcasting allocation is excluded from the definition of party election expense. However, it is not excluded from the definition of referendum expense. If you use the allocation to produce and publish advertising during the regulated period that promoted one or more referendum options, the


cost of the advertisement must also be counted separately as a referendum expense. You only need to complete a referendum return if your party spends over \$100,000 on referendum advertising in respect of either referendum during the regulated period.

In Part D you should record details of all expenses incurred using the broadcasting allocation promoting the party or attacking another party or candidate or encouraging people to vote or not to vote in a particular way in a referendum.

WRITE 'NIL' IF YOU HAVE NO EXPENSES TO DECLARE HERE:

TOTAL FOR PART D

\$ 53,840.00

Supplier's name and street address This should be the production company, media buyer or broadcaster on the invoice provided to the Electoral Commission for payment of the account	Invoice date or dates	Description of allocation expenses List the total production costs, television placement, radio placement and internet placement costs for each supplier separately	Value \$0.00 (inc GST)
EXAMPLE: Make Believe Television 84 Shortland Street Auckland 6000	1st and 10th of October 2020	Production costs 13 September - 12 October 2020 Television placement costs on Channel A and Channel B 1 October - 16 October 2020 Radio placement costs on Radio X and Y 20 - 30 September 2020 Social Media promotional posts	\$10,000 \$62,450 \$11,450 \$300
Point Media Ltd 7b Burns Street Grey Lynn Auckland 1021	25 September 2020	Facebook Adverts Creative Development 4 x Facebook/Instagram Video Link Adverts	\$ 28,044.99 \$ 1,776.87
NZME 2 Graham Street Auckland 1010	31 October 2020	Radio advert placement 30/09/2020 - 11/10/2020	\$ 24,018.14
			

PART E: PARTY AND CANDIDATE SHARED BROADCASTING ALLOCATION EXPENSES

In Part E record allocation expenses used to produce or place advertising on television, radio or the internet featuring the party and one or more candidates.

PROVIDE the following information below:

- **Supplier's name and address:** This should be the media buyer or broadcaster on the invoice provided to the Electoral Commission for payment of the account
- **Invoice date or dates**

- **Description of allocation of expenses:** List the total production costs, television placement, radio placement and internet placement costs for each supplier separately and the names of the candidates
- **Value \$0.00 inc GST**
- **% apportioned to the party**
- **% apportioned to the candidate**

WRITE 'NIL' IF YOU HAVE NO EXPENSES TO DECLARE HERE:

NIL

TOTAL FOR PART E

\$ 0.00

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PART F: CANDIDATE ONLY BROADCASTING ALLOCATION EXPENSES

In Part F record the party's broadcasting allocation used to produce or place a candidate election advertisement on television, radio or the internet.

PROVIDE the following information below:

- **Supplier's name and address:** This should be the media buyer or broadcaster on the invoice provided to the Electoral Commission for payment of the account
- **Invoice date or dates**

- **Description of allocation of expenses:** List the total production costs, television placement, radio placement and internet placement costs for each supplier separately
- **Candidate name**
- **Value \$0.00 inc GST**

WRITE 'NIL' IF YOU HAVE NO EXPENSES TO DECLARE HERE:

NIL

TOTAL FOR PART F

\$ 0.00

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AUDIT REPORT

To the Council members of the NZ Democratic Party for Social Credit Inc.

We have audited the attached Return of Party Election Expenses (the Return) for the 2020 General Election period 18th August 2020 to 16th October 2020, being the regulated period. The return is prepared in compliance with section 206L of the Electoral Act 1993 No 87 [Electoral Act], and provides information about Party election expenses incurred by the **NZ Democratic Party for Social Credit Inc.** This audit report is made solely to the Party Secretary. My audit has been undertaken so that I might state to the Party Secretary those matters I am required to state to them in an auditor's report, and for no other purpose. To the fullest extent permitted by law, I do not accept or assume responsibility to anyone other than the Party Secretary, for my audit work for this report, or for the opinions I have formed.

Secretary's Responsibilities

The Secretary is responsible for ensuring that the Electoral Commission receives a return of the Party's election expenses, incurred by the Party for the period 18th August 2020 to 16th October 2020, by 24th March 2021, per section 206L.

Auditors' Responsibilities

It is our responsibility to express an independent opinion on the Return in terms of the requirements of section 206L of the Electoral Act. I conducted my audit in accordance with the International Standards of Auditing (New Zealand). Those standards require that I comply with Ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the Return is free from material misstatement. Other than in my capacity as auditor I have no other relationship with, or interests in the NZ Democratic Party for Social Credit Inc.

Basis of Opinion

An audit includes examining for evidence

relevant to the position disclosed in the Return as regards whether or not total incurred expenditure was less than the permitted maximum expenditure.

We conducted our audit in accordance with New Zealand auditing standards. We planned and performed our audit so as to obtain all the information and explanations which we considered necessary in order to provide us with sufficient evidence to give reasonable assurance that the position that "the Party total election expenses", did not exceed the maximum amount prescribed by section 206, disclosed by the Return, is free from material misstatement, whether caused by fraud or error.

Unqualified Opinion

The Return submitted by the Secretary on behalf of the NZ Democratic Party for Social Credit Inc, shows the position that election expenses incurred in the 2020 General Election, as defined in section 206 of the Electoral Act, did not exceed the permitted maximum as defined in section 206C of the same Act.

In our opinion this position is correct.

Our audit was completed on 23rd March 2021 and our unqualified opinion is expressed as at that date.



Director - Peter Conaglen
Charity Integrity Audit Ltd - Chartered
Accountants
South Auckland



Head Office: 42 Reyburn House Lane, Whangarei Ph 021 922098
Email: secretary@socialcredit.nz Website: www.socialcredit.nz

16 March 2021

Mr Peter Conaglen
1275a East Coast Road
Kaiaua
Pokeno 2473

Dear Peter

Letter of Representation for Party Return of Expenses for the 2020 General Election

This representation letter is furnished in connection with the return of party election expenses and broadcasting allocation expenses for the 2020 general election (the return) by the New Zealand Democratic Party for Social Credit Incorporated (the Party) made in accordance with sections 206I and 206IA of the Electoral Act 1993 (the Act) which has been subject to an assurance engagement and reported on by you in accordance with sections 206L and 206LA of the Act.

I understand that your assurance engagement was conducted in accordance with the relevant provisions of the Act and the applicable Auditing and Assurance Standards issued by the New Zealand Auditing and Assurance Standards Board.

I confirm and take responsibility for the following representations after taking all reasonable steps to assure myself of them:

- 1 The return has been prepared in accordance with the relevant provisions of the Act.
- 2 I am responsible for establishing and maintaining a system of internal control designed to provide reasonable assurance as to the integrity and reliability of the return. I have done this, and all explanations or demonstrations of this to you have been complete and accurate.
- 3 All records, documents and accounts (records) have been kept by the Party (including subsidiary entities) and made available to you, and these materials will be retained in accordance with the requirements of the Act.
- 4 I have disclosed to you:
 - 4.1 any material transactions not disclosed in the records;
 - 4.2 the existence of all relevant agreements or activities relating to the Party's members of the previous Parliament, electorate candidates, subsidiary or closely connected political entities, third party promoters (whether registered or not), and other political parties (whether registered or not) or their electorate candidates;

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- 4.3 any alleged, suspected or proven illegal activity under the Act or other legislation potentially relevant to the return or instances of non-compliance with applicable requirements;
- 4.4 any outstanding disputed claims, matters with authorities, or planned or continuing litigation; and
- 4.5 the fact of, and results from, any assessment made by me that considered whether the records of the Party may be materially misstated or incomplete for any reason; any design deficiencies in the compliance system and instances where that system has not operated as described.
- 5 I have sought, received, and hold in the Party's records confirmation from, or on behalf of, any Party members of the previous Parliament that all party advertisements published, or election expenses incurred by those members of Parliament have been disclosed to me, with adequate supporting records, for inclusion in this return.
- 6 The return contains the total returnable expenses of the Party for the 2020 general election whether paid or incurred before, during, or after the regulated period. The return includes all expenses, including apportioned expenses, and irrespective of the source of funds or entity paying for the activities concerned, and irrespective of whether or not an advertisement contained a promoter statement.
- 7 Parts A to C of the return's contents have been determined by considering, in the following sequence, these questions and the relevant provisions of the Act:
- 7.1 Was the advertising undertaken by the party secretary, or with their authority? [definition of **election expenses**, section 206(1)] (If no, advertising is not an election expense).
- 7.2 If yes - did the advertising constitute **publishing**? [definition of **publish**, section 3D; definition of **election expenses**, section 206(1)] (If no, advertising is not an election expense).
- 7.3 If yes - was that the publishing of a **party advertisement**? That is, did the advertisement encourage or persuade, or appear to encourage or persuade, voters to vote for the party, or against another party, or both? [definition of **party advertisement**, section 3(1); definition of **election expenses**, section 206(1)] (If no, advertising is not a party election expense).
- 7.4 If yes - was the advertising undertaken (or deemed to be undertaken) during the regulated period (from 18 August to 16 October 2020)? [definition of **regulated period**, section 3B; definition of **election expenses**, section 206(1)] (If no, advertising is not an election expense).

- 7.5 If yes:
- 7.5.1 What expense was incurred in undertaking the advertising? [definition of **advertising expenses**, section 3E; definition of **election expenses**, section 206(1)]
 - 7.5.2 What cost was involved in respect of the preparation, design, composition, printing, distribution, postage and publishing of the party advertisement? [section 3E(1)(a)(i)]
 - 7.5.3 What was the reasonable market of any **material** used for or applied toward the party advertisement, including material provided free of charge, or below reasonable market value? [section 3E(1)(a)(ii)]
 - 7.5.4 Was the advertisement a **joint party advertisement** [section 206CB], or a **joint party and candidate advertisement** [section 206CC]? (If yes, the costs can be apportioned based on coverage).
 - 7.5.5 Was the advertisement published before the regulated period and continued to be published during the regulated period [section 206CA]? (If yes, the costs can be apportioned with the costs attributed to the regulated period counted).
- 7.6 Do any of the costs identified above fall within any of the election expense exceptions? [section 3E(1)(b)]
- 7.6.1 The conduct of any survey or public opinion poll (other than push-polling).
 - 7.6.2 Framework, other than a commercial framework, supporting a hoarding displaying the party advertisement.
 - 7.6.3 The labour of any person provided free of charge by that person.
 - 7.6.4 Replacement of election materials damaged in circumstances out of the party's control.
 - 7.6.5 Expenses, including running costs, of a vehicle used to display a party advertisement (provided payment was not made or promised) for the display of the advertisement on the vehicle.
 - 7.6.6 Allocations from the Electoral Commission of money for election broadcasting [definition of **election expenses**, section 206(1)(c)].
- If yes, that specific cost is not an election expense.
- 7.7 Where an apportionment of election expenses is given in the return:
- 7.7.1 the basis of apportionment is appropriate, and has been properly applied and recorded; and
 - 7.7.2 the information contained in the Party's return is known to be consistent with that of the Party's electorate candidates, or the undertakings of other entities involved in the apportionment included in the records.

- 8 Where the Party received a broadcasting allocation for the 2020 general election Parts D to F have been determined by considering these questions and the relevant provisions of the Electoral Act 1993 (the Electoral Act) and Part 6 of the Broadcasting Act 1989 (the Broadcasting Act):
- 8.1 Was the allocation used by the Party to produce, broadcast or publish election programmes on television, radio or election advertisements on the internet for the 2020 general election? [definition of **election programme**, **broadcasting costs**, **production costs** and **publishing costs**, section 69(1) Broadcasting Act; definition of **election advertisement**, section 3A Electoral Act] (If no, advertising is not an allocation expense).
- 8.1.1 If the allocation was used for **broadcasting costs** - was the placement on television or radio during the **election period** (from 13 September to 16 October 2020)? [definition of **election period**, section 69(1) Broadcasting Act] (the allocation cannot be used for broadcasting costs on radio or television outside of the election period).
- 8.1.2 If the allocation was used for **publishing costs** - was the placement on the internet during the **election period**? (the allocation can only fund publishing costs during the election period. Parties can spend their own funds on internet placement costs before and during the election period and those costs must be declared as election expenses in Parts A-C if the election advertising was published in the regulated period (see 7.4 above)).
- 8.1.3 If the allocation was used for **production costs** what cost was involved in respect of the preparation, design, composition and creation of the programme or advertisement? [section 69(1) Broadcasting Act]. Parties can spend their own funds on production costs before and during the election period and those costs must be declared as election expenses in Parts A to C if the production costs are for election advertisements that were published in the regulated period (see 7.4 above)).
- 8.2 Was the allocation spent on any **advertising that promoted the party and a candidate** [section 70(2) of the Broadcasting Act and section 205EA and 206CC of the Electoral Act]? (If yes, the Party must report the total amounts spent on joint party and candidate advertising in Part E of the return and the percentage coverage provided to the Party and candidate. The candidate will need to report the value apportioned to the candidate as candidate election expenses and a donation from the Party in the candidate's return of expenses and donations).
- 8.3 Was the allocation spent on **advertising that solely promoted a candidate** [section 70(3) of the Broadcasting Act]? (If yes, the Party must report the amounts spent on candidate only advertising in Part F of the return and the candidate will need to include the costs as candidate election expenses and a donation from the party in the candidate's return of expenses and donations).
- 8.4 Has the Party reported details of all accounts sent by the Party to the Electoral Commission under section 80B(1) of the Broadcasting Act in respect of expenditure of the party's allocation? [section 206IA of the Electoral Act]. The Commission pays suppliers' invoices that have been

certified by an authorised party official as payable from the party's broadcasting allocation. With the exception of internet advertising placement costs paid directly by the party (for example, Facebook promoted posts), payments are made to suppliers and no money is paid directly to parties in accordance with the requirements of section 80B of the Broadcasting Act.

- 9 Any and all misstatements you have identified during the course of your assurance engagement have been adjusted in the final return.
- 10 I have completed my own procedures, distinct from your assurance engagement processes, to evaluate the accuracy and completeness of the return.
- 11 The return is free of any material misstatements or omissions.

These representations are made in terms mutually agreed between us, and to supplement information obtained by you from the records of the Party and to confirm information given to you orally.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'av Leitch'.

Anne V. Leitch
Party Secretary