

May 5, 2022

Mr. Bob Lagassé, MLA
Room 227 Legislative Building
450 Broadway
Winnipeg, MB R3C 0V8

Manitoba Liberal Party
635 Broadway
Winnipeg MB R3C OX1
Attention: Sam Dixon, Director of Operations

Dear Mr. Lagassé and Mr. Dixon

On October 25, 2021, I received a complaint from Sam Dixon, Executive Director of the Manitoba Liberal Party. Mr. Dixon's complaint alleged that Bob Lagassé breached s. 35 of *The Election Financing Act* (the "EFA") by offering residents of his constituency entry into a draw for a pair of shoes if they purchased or renewed a PC Party membership.

Our investigator found that on at least two occasions in August 2021, Mr. Lagassé posted social media messages to the effect that he would enter any of his constituents who purchased or renewed PC Party membership into a draw for a pair of custom Vans sneakers. Although in one of these posts, Mr. Lagassé indicated he was supporting Heather Stefanson's leadership campaign, the opportunity to be included in the draw did not depend on support for a particular candidate.

Mr. Lagassé advised our investigator that he had no intention of breaching the EFA, but that he proposed the draw as a way of trying to grow the PC Party's membership list in his constituency. As of the date of his letter, Mr. Lagassé had not yet made the draw and indicated that he would refrain from doing so if it was not permitted by the EFA.

Section 35(4) of the EFA prohibits a person from offering to reimburse or otherwise compensate another individual for a "contribution". "Contribution" is defined by s. 32(3) to include fees paid for membership in a political party.

I am of the view that offering an entry into a draw for an item of value is prohibited by s. 35(4) of the EFA. It is a form of compensation offered in connection with a contribution. It is not difficult to conceive of a scenario involving a high-value item, such as a car, which would clearly fall

outside both the letter and spirit of the EFA. I find that the same logic applies in the present case, even though the entry into a draw for a pair of shoes is of relatively minimal value.

I accept Mr. Lagassé's description of this as an unintentional contravention of the EFA. We have found no evidence, and it seems on its face unlikely, that Mr. Lagassé's offer affected the PC Party leadership contest or had a significant effect on the purchase of PC Party memberships in Mr. Lagassé's constituency. I have concluded that it is not in the public interest to lay a charge. In accordance with the recent changes to the EFA, this letter will be published on the Commissioner's website. In my view, no further action is warranted. I consider this matter completed and will close my file.

Yours truly,

A handwritten signature in cursive script, appearing to read "Bill Bowles".

Bill Bowles