

February 26, 2026

Elections Manitoba
120 - 200 Vaughan Street
Winnipeg, Manitoba R3C 1T5
Attn: Tracy Nysten
BY EMAIL

Mr. Josh Okello
165 Cedar Avenue
Winkler, MB R6W 1S3
BY EMAIL

Report on Josh Okello campaign contributions

After each election, Elections Manitoba reviews audited financial statements provided by each candidate or by the candidate's official agent. In June of 2024, Elections Manitoba asked me to review two contributions made to the campaign of Josh Okello, who had been a candidate for the PC Party in the 2023 general election. In his financial statements, the contributions were attributed to Mr. Okello's two young children. Elections Manitoba asked me to investigate whether these contributions complied with *The Election Financing Act* (the "EFA").

An investigator spoke with both Mr. Okello and his official agent, Riese Penner, and reviewed the documentation that had been provided by Elections Manitoba. His investigation determined the following.

In early 2023, Mr. Okello became the PC Party of Manitoba candidate in Elmwood. This was the first time he had run in an election, though he had sought a nomination in the past. He asked Mr. Penner, who was a friend, to assist him with financial matters. Neither Mr. Penner nor Mr. Okello had experience with election financing rules.

Mr. Penner told us that he did not find out that he had been identified as Mr. Okello's official agent until after the election period had begun. Complicating things further, he was away on travel for a couple of weeks during the election period. He does not believe that he became aware of the statutory obligations of an official agent until he began to work on the post-election reporting material for Elections Manitoba toward the end of 2023.

Initially, in early 2023, Mr. Okello had opened a bank account, with Mr. Penner's assistance, to run for a nomination at the federal level. The bank account was opened under the name "Josh Okello Nomination Campaign". Although that account was repurposed for use in the provincial campaign, Mr. Okello did not make regular use of it. Instead, he mostly paid campaign expenses

from his personal account. He did this, he says, because Mr. Penner was away for part of the campaign period, and it was more efficient or convenient to use his personal account.

An individual may make a political contribution of up to \$5000 in each calendar year. Mr. Okello and his wife decided they would each make a \$5,000-contribution to Mr. Okello's campaign. However, instead of writing cheques to the campaign in the amounts of their contributions, Mr. Okello simply paid expenses out of his and his wife's joint account that were not reimbursed by the campaign.

Mr. Okello said that he and his wife also spoke about an additional contribution from the family that would be attributed to their two children, who were then both under seven years old. Mr. Okello could not remember whether he discussed this with his children (both of whom were under the age of 10), but if he did, he admitted that they likely would not have understood. In any event, the children did not have funds in the amounts attributed to them – \$3,900 and \$3,498, respectively. Again, these contributions were dealt with by way of expenses paid out of Okello's joint account that were not reimbursed by the campaign.

After the election, Mr. Penner filed a Form 932, which set out the names and addresses of each of the contributors and the amounts of their respective contributions. This included the contributions attributed to each of the four Okellos. Elections Manitoba flagged the fact that multiple contributions had come from the same household. Elections Manitoba requested, pursuant to s. 35(7) of *The Election Financing Act*, that the two Okello children sign affidavits stating that they had made the contributions with their own money. Elections Manitoba prepared the affidavits and sent them to Mr. Okello to be signed.

Mr. Okello initially proposed that he sign on behalf of his family, but section 35(7) requires each contributor sign personally. Mr. Okello therefore had his children sign the affidavits even though, as he has since acknowledged, he did not read them carefully to his children, or try to explain them, before the children signed. He believed that because the funds were family funds, they could properly be characterized as belonging to the children. He then provided the affidavits to Mr. Penner by email. Mr. Penner signed them and submitted them to Elections Manitoba. Mr. and Ms Okello received tax receipts for their contributions, but his children did not.

Mr. Okello's children did not understand the affidavits they signed, and the affidavits can therefore be discounted. The donations said to be made by Mr. Okello's children were actually made by Mr. Okello and/or his wife and were contrary to *The Election Financing Act*, both because they put the Okellos over the contribution limit and because they were made in someone else's name. That said, this was the first campaign for both Mr. Okello and Mr. Penner and I am satisfied that neither of them were familiar with all of the rules set out in *the Elections Financing Act*. I am also satisfied that they believed the donation from Mr. Okello's children would be permissible. Finally, I have noted the investigator's comments to the effect that both Mr. Okello and Mr. Penner were cooperative and forthright when the investigator spoke with them. In the circumstances, I do not

believe a prosecution would be in the public interest. Instead, I have suggested to Mr. Okello, and he has agreed, that we enter into a compliance agreement. That agreement has now been signed by both of us and a copy is attached to this report. Once Mr. Okello has complied with its terms, I will consider this matter to be closed.

Yours truly,



Bill Bowles
Commissioner of Elections for Manitoba

Manitoba Commissioner of Elections

Compliance Agreement

This notice is published by the Manitoba Commissioner of Elections (the “Commissioner”) pursuant to s. 103(3) of *The Election Financing Act*, C.C.S.M. c. E27 (the “Act”).

Effective February 14, 2026, the Commissioner entered into the following compliance agreement with Joshua Okello (the “Contracting Party”) pursuant to s. 103(1) of *The Elections Act*, as follows:

Facts

The Commissioner received a complaint alleging that the Contracting Party may have made contributions to his campaign exceeding the allowable annual contribution limit in breach of s. 34 of the Act. A breach of s. 34 of the Act is an offence pursuant to s. 99(1)(b). After causing an investigation to be made into the complaint, the Commissioner concluded that there were reasonable grounds to believe the Contracting Party had committed such an offence.

Statements by the Contracting Party

For the purpose of this compliance agreement, the Contracting Party admits the following:

- The Contracting Party made contributions (the “Excess Contributions”) to his campaign from his household funds that were \$7,398 higher than permitted under the Act.
- The Contracting Party attributed the Excess Contributions to the names of his children, who were both under seven years old at the time, even though the funds belonged to Mr. Okello and his spouse.
- The Contracting Party had his children sign compliance affidavits without properly reading them and even though his children did not understand them.
- The Contracting Party acknowledges that he did not take sufficient care to ensure that he understood and followed the electoral financing requirements of the Act.
- The Contracting Party acknowledges and accepts responsibility for his conduct. He recognizes that electoral financing rules are a fundamental component of our electoral system.

- The Contracting Party understands that acknowledgement of non-compliance does not constitute a guilty plea in the criminal sense and that no record of conviction is created as a result of admitting responsibility for acts that could constitute an offence.
- The Contracting Party acknowledges that the Commissioner has advised him of his right to be represented by counsel and he had the opportunity to retain and instruct counsel before entering into this compliance agreement.

Factors Considered by the Commissioner

In entering into this compliance agreement, the Commissioner took into account the following factors:

- The Contracting Party has no past history of non-compliance with the Act;
- The Contracting Party cooperated with the investigation, admitted his wrongful conduct and expressed regret for it; and
- The wrongful conduct of the Contracting Party did not impact the outcome of the election in the electoral division of Elmwood.

Terms and Conditions

In accordance with s. 103(2) of the Act, within 90 days from the date of being informed that the Commissioner has signed this compliance agreement the Contracting Party undertakes to:

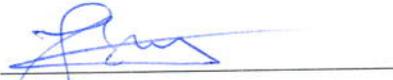
- Certify by letter to the Commissioner that he has read Part 4 of the Act and the Code of Ethical Conduct and Candidate's Guide published on the Elections Manitoba website, and that he will comply with the Act, the Candidate's Guide and the Code of Ethical Conduct in the future.

The Commissioner agrees that the fulfillment of these terms and conditions by the Contracting Party will constitute compliance with this compliance agreement, at which time he will issue notice of the Contracting Party's compliance.

The Contracting Party consents to publication of this compliance agreement on the Commissioner's website pursuant to s. 103(3) of the Act.

The Commissioner and the Contracting Party recognize that once this compliance agreement is entered into and notice of compliance has been issued, the Commissioner will be prevented from laying charges against the Contracting Party for the same facts.

Signed by the Contracting Party in the city of Winnipeg, in the province of Manitoba, on Feb 26th, 2026.



Joshua Okello

Signed by the Commissioner in the city of Winnipeg, in the province of Manitoba, on Feb 19th, 2026.



L. William Bowles
Commissioner of Elections