

JAVAD MARANDI: Who is the Conservative Party donor with alleged links to the vast money laundering operation known as the Azerbaijani Laundromat?

Summary

Javad Marandi, an international businessman and major donor to the Conservative Party, can now be named as someone found to be “a person of importance” in a court case about the money laundering operation dubbed the “Azerbaijani Laundromat”.¹ No findings of wrongdoing have been made against Mr Marandi. However, the proceedings and underlying facts – including Mr Marandi’s alleged involvement with key persons and companies at the heart of the Laundromat – raise a number of unanswered questions with significant public interest that require further investigation. The lifting of an anonymity order protecting Mr Marandi’s identity² allows better public scrutiny of these questions:

1. Whether the National Crime Agency has investigated Mr Marandi as “a person of importance” in transactions associated with the Laundromat, and whether any decision to do so or not has been influenced by these proceedings or by his public profile?
2. What are the implications of this case for the kinds of checks that political parties should do on donations from, and for limiting access to politicians by, those who are considered “persons of importance” in law enforcement investigations?
3. Whether the possibility that the Azerbaijani Laundromat may have been used for a foreign influence operation within the UK has been adequately investigated by the appropriate authorities?

Javad Marandi – international businessman, property tycoon and Conservative Party donor

Mr Marandi is an Iranian-born British retail and property tycoon with extensive business and political links within Azerbaijan. He owns the McDonald’s franchise for Azerbaijan,³ and has worked as a consultant for Pasha Construction,⁴ a subsidiary of Pasha Holding, an Azerbaijani conglomerate reportedly owned by President Aliyev’s daughters Arzu and Leyla Aliyev.⁵ It is on public record that he introduced the Aliyev daughters to a British law firm in relation to a proposed £60 million property deal in London in which he was the vendor, and also “gifted” a London apartment to Mirjalal Pashayev, cousin to Azerbaijan’s first lady, Mehriban Aliyeva.⁶ Mr Marandi has extensive investments in restaurants, fashion stores, and property in the UK and France.⁷

¹ <https://www.occrp.org/en/azerbaijanilaundromat/the-core-companies-of-the-azerbaijani-laundromat>

² *The King (on the application of MNL) v Westminster Magistrates’ Court* [2023] EWHC 587 (Admin)

³ <https://www.ibtimes.co.uk/javad-marandi-immigrant-child-global-entrepreneur-making-british-success-story-1681359>

⁴ <https://www.telegraph.co.uk/business/2017/01/15/javad-marandi-iranian-refugee-soho-house-investor/>

⁵ <https://www.rferl.org/a/azerbaijan-ilham-aliyev-firms-with-official-ties-absent-tax-registry/28388581.html>

<https://www.azadliq.org/a/pasa-holding--aliyevlarin-hollandiyadan-basl原因-aila-biznesi/25376221.html>

⁶ *Solicitors Regulation Authority v Khalid Mohamed Sharif* (Case no: 11805-2018) at para 8:

<https://www.solicitortribunal.org.uk/sites/default/files-sdt/11805.2018.Sharif.pdf>. See also <https://www.theguardian.com/uk-news/2018/dec/21/azerbaijan-leaders-daughters-tried-to-buy-60m-london-home-with-offshore-funds>

⁷ <https://www.telegraph.co.uk/business/2017/01/15/javad-marandi-iranian-refugee-soho-house-investor/>

Mr Marandi is a philanthropist, having made large donations to homeless charity Centrepoin⁸, the Serpentine Gallery,⁹ and the Royal Foundation of the Prince and Princess of Wales.¹⁰ The donations were made via The Marandi Foundation, which he and his wife founded in March 2017.¹¹ They are trustees along with Sir Michael Lockett, a public relations professional who organised the election tours of several Conservative Party leaders, including John Major's in 1997 and David Cameron's in 2005.¹²

Mr Marandi is also a major Conservative Party donor, having donated £663,800 between 2014 and 2020, including £250,000 shortly before the snap general election in December 2019. Several weeks later, he was awarded an OBE in the New Year's honours list.¹³

He was reportedly invited several times to meetings of the Conservative Party's "advisory board" of wealthy donors and attended on at least one occasion. The group has reportedly been consulted by the Conservative Party on both the party's and the government's policy and political direction, receiving privileged access to senior ministers and officials.¹⁴

More recently, Mr Marandi has lobbied the UK government to deregulate small businesses and financial services. In 2022, he commissioned a report by the Centre for Policy Studies, an influential Thatcherite think tank, about how to support UK exporters after Brexit.¹⁵ He said that the government needs to do more to get rid of "red tape", and his report argued for further liberalisation of the UK's financial services sector. In March that year, he attended a roundtable at the Department for International Trade to discuss the report with Anne-Marie Trevelyan, the then minister for international trade.¹⁶

Mr Marandi has also been named as a background figure in recent UK legal proceedings:

- In January 2019, the Solicitors Disciplinary Tribunal found that a solicitor at Child & Child breached the Money Laundering Regulations when acting in London property transactions involving Mr Marandi and relatives of Ilham Aliyev which "disclosed a serious risk of money laundering".¹⁷ The Tribunal case made no allegation against Mr Marandi and the relatives.
- In January 2022, the Westminster Magistrates' Court ordered the civil forfeiture of £5.6 million held in UK bank accounts by relatives of the sitting Azeri politician Javanshir Feyziyev, including £1 million in payments from Mr Marandi, that were found to have been filtered through the Azerbaijani Laundromat.

In both cases, the anonymisation of Mr Marandi's name shielded him from public attention, at least for a time.¹⁸ Mr Marandi's sustained efforts to keep his name out of the NCA's dirty money case against Mr Feyziyev's relatives had the effect of limiting public scrutiny and debate on matters of significant public interest which arise from the circumstances in which he was named in the court's judgment. The fuller disclosure of this information now allows more open discussion and investigation of the alleged connection between a major donor to the Conservative Party with access

⁸ <https://bit.ly/3m2alzG>

⁹ <https://bit.ly/3M8PRzB>

¹⁰ <https://www.themarandifoundation.org/young-people-wellbeing/>

¹¹ <https://register-of-charities.charitycommission.gov.uk/charity-search/-/charity-details/5098899/full-print>

¹² <https://www.themarque.com/profile/michael-lockett>

¹³ <https://twitter.com/wyeates/status/1210989294447403014>

¹⁴ <https://www.thetimes.co.uk/article/the-ultra-rich-tory-donors-with-access-to-boris-johnsons-top-team-96bvcwcl>

¹⁵ https://cps.org.uk/wp-content/uploads/2022/03/CPS_TRADING_UP.pdf

¹⁶ <https://openaccess.transparency.org.uk/?meeting=82513>

¹⁷ *Solicitors Regulation Authority v Khalid Mohamed Sharif* (Case no: 11805-2018): <https://www.solicitorstribunal.org.uk/sites/default/files-sdt/11805.2018.Sharif.pdf>

¹⁸ In the SDT decision, Mr Marandi is referred to as "Y" but was named in the press: <https://www.theguardian.com/uk-news/2018/dec/21/azerbaijan-leaders-daughters-tried-to-buy-60m-london-home-with-offshore-funds>. In the Azerbaijani Laundromat case, Mr Marandi was referred to as "MNL" but the court subsequently lifted the reporting restrictions protecting his identity.

to the heart of government, and a multi-billion pound money laundering operation. No findings of wrongdoing have been made against Mr Marandi in these legal proceedings, in which he was not a party or witness, and none are suggested here. However, this and other cases raise whether there is a need for more robust checks on political donations to be embedded in political party processes.

UK property transactions

Mr Marandi has considerable property in the UK. He was named in the Panama Papers for his ownership of a London property through an off-the-shelf BVI-registered company called 31 Hans Place Investments Limited which he bought through the Panamanian law firm Mossack Fonseca.¹⁹ Mr Marandi has insisted his use of opaque ownership structures is to protect his privacy rather than hide illegality, saying “I don’t want everyone to know where my houses are or how much I bought them for”.²⁰

In January 2019, the Solicitors Disciplinary Tribunal found that Khalid Mohammed Sharif, a director of Child & Child, breached his obligations under the Money Laundering Regulations in various property transactions involving Mr Marandi.²¹ This included:

- Mr Sharif taking instructions from Mr Marandi in relation to the proposed purchase in 2015 of two Knightsbridge flats for £60 million by Leyla and Arzu Aliyeva, the daughters of Ilham Aliyev.²²
- Mr Sharif ignoring red flags when acting for Mr Marandi between November 2013 and March 2014 in a property transaction that saw him “gift” a £3.5 million apartment at 31 Hans Place in Knightsbridge to Mirjalal Pashayev, a cousin of Azerbaijan’s first lady, Mehriban Aliyeva.²³

Although Mr Marandi is referred to as “Y” throughout the tribunal decision, he was identified in the press.²⁴ The tribunal found that Sharif’s misconduct was “very serious” and he was fined £45,000.²⁵ The tribunal decision did not suggest that Mr Marandi or the people he undertook to act as a go-between for had done anything wrong but focused on the obligations on the solicitor which this gave rise to.

The Azerbaijani Laundromat

The “Azerbaijani Laundromat” is the name given to a money laundering scheme uncovered in 2017 by reporters at the Sarajevo-based Organized Crime and Corruption Reporting Project (OCCRP). The scheme benefitted senior figures in the Azerbaijani regime. Some of the funds were allegedly used to bribe and lobby European decision-makers in a bid to whitewash Azerbaijan’s record on human rights and corruption.

Between 2012 and 2014 – while Azerbaijan imprisoned scores of critics and successfully struck a deal to chair the Council of Europe and host the 2015 European games – approximately 17,000 transfers were made from the Estonian branch of Danske Bank, totalling \$2.9 billion. Accounts at the bank were held by several Limited Liability Partnerships registered in the UK.²⁶

¹⁹ <https://offshoreleaks.icij.org/nodes/10210238>

²⁰ <https://www.telegraph.co.uk/business/2017/01/15/javad-marandi-iranian-refugee-soho-house-investor/>

²¹ *Solicitors Regulation Authority v Khalid Mohamed Sharif* (Case no: 11805-2018):

<https://www.solicitortribunal.org.uk/sites/default/files-sdt/11805.2018.Sharif.pdf>

²² *Solicitors Regulation Authority v Khalid Mohamed Sharif* at para 15; <https://www.theguardian.com/uk-news/2018/dec/21/azerbaijan-leaders-daughters-tried-to-buy-60m-london-home-with-offshore-funds>

²³ *Solicitors Regulation Authority v Khalid Mohamed Sharif* at para 18

²⁴ <https://www.theguardian.com/uk-news/2018/dec/21/azerbaijan-leaders-daughters-tried-to-buy-60m-london-home-with-offshore-funds>

²⁵ *Solicitors Regulation Authority v Khalid Mohamed Sharif* at para 37

²⁶ <https://www.theguardian.com/world/2017/sep/04/everything-you-need-to-know-about-the-azerbaijani-laundromat>

A portion of the funds allegedly came from Azerbaijani state ministries, as well as Rosoboronexport, a Russian state-owned arms company. However, the largest tranche (US\$1.4 billion) allegedly came from an account at International Bank of Azerbaijan (IBA), an Azerbaijani state-controlled bank.²⁷

Azerbaijan allegedly used the scheme to fund “*caviar diplomacy*” – its long-standing influence operation to muzzle members of the Council of Europe from speaking out against Azerbaijan’s brutal crackdown on civil liberties. In return for their silence, Azerbaijani politicians lavished MEPs with expensive gifts including money, gold, silver, silk rugs, drinks and caviar.²⁸ Exposure of the scheme sparked several criminal prosecutions, most notably of Italian MEP Luca Volontè, who allegedly received €2 million from the Azerbaijani Laundromat between 2012 and 2014.²⁹ The funds were paid from the Danske Bank accounts of Hilux Services LLP and Baktelekom MMC, an Azerbaijani company believed to be linked to the family of President Aliyev.³⁰

In the UK, the NCA has used information from the OCCRP investigation of the Azerbaijani Laundromat to pursue several civil recovery cases. In one of these cases, the NCA applied for forfeiture orders against £15.38 million frozen in UK bank accounts held by the wife, son and nephew of Javanshir Feyziyev, a sitting member of Azerbaijan’s parliament. In addition to revealing close business ties between Mr Feyziyev and Mr Marandi (who was referred to anonymously as “MNL”), the NCA’s evidence and the court’s judgment detail the role that Mr Marandi allegedly played in receiving and transferring funds from companies at the core of the Azerbaijani Laundromat.

Payments from Avromed Company (Seychelles):

- Mr Marandi is identified as the beneficial owner of the Seychelles-incorporated Avromed Company, which received substantial funds into its Latvian bank account from Hilux Services LLP and Polux Management LLP, two of the core UK entities in the Azerbaijani Laundromat.³¹
- Between 2005 and 2017, Avromed Company allegedly paid out more than US\$48 million to Mr Marandi himself, more than US\$106 million to another of Mr Marandi’s companies called Vynehill Enterprises Ltd, and more than US\$34 million as well as a further €3 million to Javanshir Feyziyev.³² The court described it as “*perplexing*” that some of these payments were simply described in bank records as “*account replenishment*”.³³
- Analysing the flow of funds involving Avromed Company, the NCA argued that “*the overwhelming implication*” is that these payments were not made as part of genuine contracts, but in order to “*deceive the bank, and conceal the fact that they were simply payments made for [Marandi’s] benefit. If so, then Avromed (Seychelles) was simply used as a front company for the purposes of money laundering.*”³⁴

Payments from Brightmax Export Limited:

- The court implicated Mr Marandi in absentia in the operation of another shell company in the Laundromat called Brightmax Export Limited, which received more than US\$24 million from Hilux Services LLP between November 2014 and May 2015 on the basis of false invoices.³⁵

²⁷ <https://amlc.eu/the-azerbaijani-laundromat-a-new-money-laundering-machine-in-a-familiar-guise/>

²⁸ <https://www.esiweb.org/publications/caviar-diplomacy-how-azerbaijan-silenced-council-europe>

²⁹ <https://www.occrp.org/en/daily/13628-italian-court-sentences-former-council-of-europe-mp-for-bribery>

³⁰ <https://www.occrp.org/en/investigations/6301-businessman-suspected-in-italian-bribery-case-linked-to-azerbaijan-s-first-family>

³¹ *National Crime Agency v Orkhan Javanshir, Parvana Feyziyeva, and Elman Javanshir* (judgment of the Westminster Magistrates’ Court dated 31 January 2022) at paras 142-144

³² *National Crime Agency v Orkhan Javanshir and Others* at para 146

³³ *National Crime Agency v Orkhan Javanshir and Others* at para 438

³⁴ NCA closing submissions, *National Crime Agency v Orkhan Javanshir and Others* at para 51

³⁵ *National Crime Agency v Orkhan Javanshir and Others* at para 183

- Javanshir Feyziyev received payments totalling US\$3.4 million from Brightmax, labelled “*account replenishment*”.³⁶ The court found that £1 million to be forfeited from his son’s account included onward payments by Mr Feyziyev of “*monies from Brightmax and via the medium of [Mr Marandi]*”.³⁷
- The court noted the NCA’s suggestion that Mr Marandi was the beneficial owner of Brightmax, although observed that his name does not appear on any official entity documents.³⁸

The court’s judgment records in relation to evidence from the NCA’s financial investigator, Philip Deeks that, “*When asked whether there was an active investigation in relation to the financial affairs relating to [Marandi], he said he could ‘neither confirm nor deny’.*”³⁹ In seeking to persuade the court that Mr Marandi should remain anonymous, his counsel argued he was a “*peripheral figure*” with a “*peripheral role*” in the forfeiture proceedings, having not been interviewed by the NCA and in circumstances where it had not been confirmed he was even under investigation.⁴⁰

Far from being a “*peripheral figure*”, Mr Marandi was considered by the judge to be “*a person of importance*” to the court proceedings. The Divisional Court affirmed the relevance of this finding to the question of whether Marandi should remain anonymous, observing that it speaks directly to the “*degree to which the public interest in open justice extends to the provision of the name in question*”.⁴¹

But the significance of Mr Marandi’s alleged association with the companies underlying these forfeiture proceedings goes further than the public interest in the disclosure of his identity. It begs the question as to whether the NCA – having advanced evidence about Mr Marandi’s involvement in transactions linked to the Azerbaijani Laundromat – is or is not investigating his role or seeking to recover the funds which he allegedly received through the Laundromat, and if it is not doing so whether the status of Mr Marandi as a major party donor may have influenced their decision-making or not.

Given the NCA’s view in the court proceedings was that the ruling elite in Azerbaijan have knowingly been involved in some of the criminal conduct related to the Laundromat,⁴² and the suggestion that some of the funds may have been used “*as part of an international lobbying operation to deflect criticism of Azerbaijan’s president*”,⁴³ there is a significant public interest in raising questions about where funds laundered into the UK have ended up.

However, the law is such that what the court found, as far as it reflects on Mr Marandi, is not a question of binding fact but rather, simply, the court’s opinion on the matters which were before it. That is the position out of inherent fairness because Mr Marandi was not a party against whom forfeiture was sought nor was he a witness. The nature of his or any person being named in such circumstances is that some evidence, necessarily incomplete, is presented in public, which may form the basis of further investigations elsewhere – particularly if of wider public interest –but the court reaches no decision which is determinative of further investigations.

³⁶ *National Crime Agency v Orkhan Javanshir and Others* at paras 184 and 444

³⁷ *National Crime Agency v Orkhan Javanshir and Others* at para 492

³⁸ *National Crime Agency v Orkhan Javanshir and Others* at para 188

³⁹ *National Crime Agency v Orkhan Javanshir and Others* at para 228

⁴⁰ *The King (on the application of MNL) v Westminster Magistrates’ Court* [2023] EWHC 587 (Admin) at para 24

⁴¹ *The King (on the application of MNL) v Westminster Magistrates’ Court* [2023] EWHC 587 (Admin) at para 45(1)

⁴² *National Crime Agency v Orkhan Javanshir and Others* at para 460

⁴³ <https://www.theguardian.com/world/2017/sep/04/uk-at-centre-of-secret-3bn-azerbaijani-money-laundering-and-lobbying-scheme>;
<https://www.esiweb.org/publications/caviar-diplomacy-how-azerbaijan-silenced-council-europe>

Prior to the removal of his anonymity Mr Marandi released a statement which denied any wrongdoing and pointed out at no time has he been investigated or questioned by any authorities, his businesses are fully audited and, in response to the NCA's evidence he subjected himself to "three separate reports by two highly reputed law firms" which unequivocally contradicted the court findings in the Laundromat forfeiture case. The decision as regards him is "unsafe", he said.⁴⁴

Donations to the Conservative Party

Marandi has donated a total of £663,800 (and his wife a further £92,500) to the Conservative Party between 2014 and 2020:

Date received	Amount	Type
15 May 2014	£25,000	Donation
1 August 2014	£5,000	Donation
5 November 2014	£33,000	Donation
19 February 2015	£30,000	Auction prize
23 April 2015	£50,000	Donation
10 December 2019	£250,000	Donation
10 March 2020	£10,800	Donation
26 June 2020	£10,000	Donation
17 November 2020	£250,000	Donation

When mapped onto the large and suspicious payments Mr Marandi allegedly received through the Azerbaijani Laundromat, if the court is right about provenance, the timing of his donations raises serious questions to investigate further as to whether the Conservative Party accepted donations after Mr Marandi's wealth may have been tainted by funds allegedly received through the Laundromat.

Mr Marandi's donations to the Conservative Party began in May 2014 – the year after he is said to have received several significant payments from the Latvian bank account held by the Seychelles-incorporated Avromed Company, which the court held was central to the money-laundering scheme. From January 2013 to October 2013 alone, the payments to Mr Marandi and Vynehill from Avromed Company totalled US\$45 million.⁴⁵ In addition, Mr Marandi made one donation to the Conservative Party – of £33,000 in November 2014 – a month after the court concluded an account he controlled allegedly received a suspicious payment of US\$1 million originating from Hilux Services LLP.⁴⁶

Mr Marandi's last known donation to the Conservative Party was a £250,000 donation made after the NCA's first witness statement in the forfeiture case (dated 7 September 2020) which details Mr Marandi's alleged involvement in transactions related to the Azerbaijani Laundromat. This means that Mr Marandi was an active donor to the Conservative Party during the time the NCA was

⁴⁴ <https://www.spotlightcorruption.org/wp-content/uploads/2023/05/JM-Statement.pdf>

⁴⁵ NCA closing submissions, *National Crime Agency v Orkhan Javanshir and Others* at para 51

⁴⁶ Supplementary witness statement of Phillip Deeks, 27 April 2021 at para 19

compiling evidence that closely associated him with transactions the agency, at the very least, considered to be part of a money laundering case fit to put before the court.

The evidence presented by the NCA also raises concerns that foreign funds laundered through the Azerbaijani Laundromat may have ultimately been used to influence UK politicians in favour of Azerbaijan:

- Javanshir Feyziyev reportedly enjoys a close relationship with Bob Blackman MP, who as chair of the APPG on Azerbaijan has taken free trips to the country and in turn welcomed Mr Feyziyev to Westminster on at least two occasions.⁴⁷ No wrongdoing is alleged in respect of Mr Blackman. By the time of Mr Feyziyev's second visit, in February 2019, the NCA had already secured freezing orders in respect of UK bank accounts held by his family members.
- Mr Marandi's substantial donations to the Conservative Party would have given him exclusive access to senior politicians. His £50,000 donation in April 2015 would have qualified him for the so-called "*Leaders Group*" of donors who are offered scheduled drinks receptions and meetings with cabinet ministers, while his donations in December 2019 and November 2020 both met the £250,000 threshold to join the "*Advisory Board*" of elite donors who are consulted for their ideas on the Conservative Party and the government's overall policy and political direction.⁴⁸

The need for tighter controls on political party donations

While no findings of wrongdoing have been made against Mr Marandi, the case is likely to renew focus on significant loopholes in the regulation of UK election finance. All major UK political parties have in the past accepted donations which were questioned in some way, including from individuals and companies under investigation or later found to be involved in economic crimes. Any dirty money in UK political finance leaves parties exposed to malign influence, risks fostering dependence on the proceeds of crime and other dubious funds, and undermines the integrity of the electoral system.

However, the Political Parties, Elections and Referendums Act 2000 does not require UK political parties to take a risk-based approach to donations, identify the true source of funds or run AML checks on donors – just to check the status of donors. As the UK's AML framework has been progressively tightened over the last decade, with other non-regulated entities such as charities required to take a risk-based approach,⁴⁹ the minimal checks that parties are required to undertake on donations are an increasingly glaring anomaly.⁵⁰

The Electoral Commission has long argued that risk management principles from AML checks by businesses could apply to election finance.⁵¹ In July 2021, the Committee on Standards in Public Life recommended that parties have AML-style procedures to determine the true source of donations.⁵² To take this case, after September 2020 any enhanced due diligence system that applied to political party donors would have uncovered not that any charge of wrongdoing had been made but that Mr

⁴⁷ <https://www.opendemocracy.net/en/opendemocracyuk/bob-blackman-azerbaiian-lobbying-javanshir-feyziyev/>

⁴⁸ <https://www.thetimes.co.uk/article/the-ultra-rich-tory-donors-with-access-to-boris-johnsons-top-team-96bvcwcl>

⁴⁹ Charity Commission, 2016, [Compliance toolkit: Protecting charities from harm, chapter 2: Due diligence, monitoring and verifying the end use of charitable funds](#) at page 4

⁵⁰ <https://www.spotlightcorruption.org/time-for-a-know-your-donor-policy/>

⁵¹ Electoral Commission, 2018, Report: Digital campaigning - increasing transparency for voters. <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/changing-electoral-law/transparent-digital-campaigning/report-digital-campaigning-increasing-transparency-voters>

⁵² Committee on Standards in Public Life (July 2021), Regulating Election Finance https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999636/CSPL_Regulating_Election_Finance_Review_Final_Web.pdf at page 58

Marandi was, at least, named in evidence as a person closely associated with persons against whom AML forfeiture orders were being sought. It is possible that a further risk-based assessment would have looked directly into matters which the court did not, namely whether there was (as the NCA evidence tended to imply) a taint on some measure of Mr Marandi's wealth, or whether, as he has always maintained, there was no sustainable case of wrongdoing. As the task of the court was not to answer that question directly, and no such electoral donations due diligence is in place yet, that investigation remains to be pursued.

As a matter of general principle, to protect the integrity of our democratic system, UK political parties should be required to undertake proper and thorough checks on donations by implementing "*know your donor*" policies.⁵³ These should protect parties from the risks of accepting donations from tainted sources or that otherwise compromise the integrity of the UK's democracy and electoral system. Parties should also be required to have effective risk assessment and due diligence controls and procedures, and the Electoral Commission should be empowered and properly resourced to enforce the rules.

⁵³ <https://www.spotlightcorruption.org/time-for-a-know-your-donor-policy/>