

## SECTION TWO

**SCOPE OF INVESTIGATION****2.1****Available Documentation**

The COI issued subpoenas, a sample copy of which is included in Appendix B to this report, to individuals and corporations of interest, and the GOC issued "Call Letters", a sample of which is included as Appendix C hereto, to all federal departments, requesting documentation and information relating to the "Sponsorship Program" and "Advertising Activities" which were the subject of Chapters 3 and 4 of the November 2003 Report of the Auditor General of Canada.

Table I summarizes the volume of documents which were provided to the COI in response to the subpoenas and call letters.

Table 1: COI Universe of Documents - Summary Metrics

DOCUMENT LIBRARIES	NUMBER OF BOXES	ESTIMATED NUMBER OF PAGES
<b>PWGSC</b>	<b>5,170</b>	<b>20,680,000</b>
<b>OTHER GOVERNMENT DEPARTMENTS</b>	<b>623</b>	<b>2,492,000</b>
<b>COMMISSION OF INQUIRY (COI)</b>	<b><u>1,275</u></b>	<b><u>5,100,000</u></b>
<b>TOTAL</b>	<b><u>7,068</u></b>	<b><u>28,272,000</u></b>

Of the estimated 28.3 million pages catalogued, 559,411 were captured in a document management database and 480,789 were disclosed to parties with standing.

The protocols and procedures, document library and catalogue maintenance, document review and analysis and document production and disclosure undertaken by Kroll are detailed in Appendix D to this report.

In addition, at the request of COI counsel, Kroll sent a letter, a sample of which is included in Appendix E hereto, to all identified recipients of sponsorship funds, and requested each to provide information and documentation to the COI pertaining to their sponsorship.

All of these documents were available to Kroll as part of our review. To the extent we have relied on any of these documents in preparing this report, they have been reproduced and entered as exhibits before the Commissioner.

## 2.2

### Scope Limitation

The above-noted documentation requests and subpoenas related to a 10-year period from April 1, 1994 to March 31, 2004. We note, certain of the requested books and underlying records and documentation relating to the communications agencies and their principals were not available

for our review. Further, we understand that the COI has heard evidence that some of the relevant GOC documents were destroyed during this time period. In addition, we understand that many of these documents have been subject to a number of audits and that as part of that process many documents were moved from the original locations in which they were found, into a "reconstructed" file for purposes of analysis.

As a result of these factors Kroll cannot provide assurance that the GOC documents and files it has reviewed are complete and represent the files as they were in the original instance. Furthermore the incompleteness of the communications agencies' and their principals' books and underlying records and related files and documentation restrict our ability to report on the ultimate use of all sponsorship and advertising funds for those agencies and related contracts and events of interest.

Kroll has done a review of selected agencies, contracts and events. Kroll has not done a review of all SPS contracts and all advertising contracts.

Kroll did not investigate any transactions which were the subject of criminal charges or which may have been the subject of ongoing criminal investigations.

