



January 17, 2025

**VIA EMAIL**

General Counsel's Office  
Canadian Regulatory Organization of Canada  
40 Temperance Street, Suite 2600  
Toronto, Ontario, M5H 0B4

Dear Sirs/Mesdames:

**Re: Proposal to Modernize the CIRO Arbitration Program  
Comments from Getz Prince Wells – Letter of Support**

In response to CIRO's recent request for comment on the impacts of the Proposal to Modernize the CIRO Arbitration Program, Odlum Brown wishes to write a letter in support of the comments submitted by our legal counsel, Getz Prince Wells LLP.

Odlum Brown echoes the feedback as presented by Getz Prince Wells LLP in their letter, dated January 16, 2025.

We are in agreement with the commentary as it relates to the scope of the program, unwarranted limitation period, lack of an adequate appeal process, support for proposals to defray costs of claimants and call to delay any formalization of the CIRO arbitration process until OBSI reform is known.

Thank you for considering our letter of support.

Yours truly,  
**ODLUM BROWN LIMITED**

Trevor Short, CIM, FCSI®  
President

- c. Debra A. Doucette, Executive Chair, Odlum Brown Limited  
Dana H. Prince, Corporate and Securities Lawyer, Gets Prince Wells LLP