Re RBC Dominion Securities

IN THE MATTER OF:

The Rules of the Investment Industry Regulatory Organization of Canada

and

RBC Dominion Securities Inc.

2022 IIROC 19

Investment Industry Regulatory Organization of Canada
Hearing Panel (Ontario District)

Heard: July 20, 2022 in Toronto, Ontario (via videoconference)
Decision: July 20, 2022
Reasons for Decision: August 2, 2022

Hearing Panel:
Marvin J. Huberman, Chair, Deborah Leckman and Richard E. Austin
Appearances:
Sally Kwon, Senior Enforcement Counsel
David A. Hausman, for RBC Dominion Securities Inc.
In Attendance:
Ed Varela, IIROC Investigations Manager
Natalie Coutu, RBC Compliance
Daniel Dawalibi, RBC Legal

REASONS FOR ACCEPTANCE OF SETTLEMENT AGREEMENT

Settlement Agreement

¶ 1 On July 20, 2022, Senior Enforcement Counsel for the Enforcement Staff of the Investment Industry Regulatory Organization of Canada ("IIROC") and counsel for RBC Dominion Securities Inc. (the "Respondent") submitted a Settlement Agreement between the Staff of IIROC and the Respondent, dated June 30, 2022 (the "Settlement Agreement"), to the Hearing Panel for acceptance or rejection pursuant to Section 8215 of IIROC's Consolidated Enforcement, Examination and Approval Rules (the "IIROC Rules"). At the conclusion of the settlement hearing, which was conducted via videoconference, the Hearing Panel accepted the Settlement Agreement with written reasons to follow. These are our reasons for acceptance of the Settlement Agreement, a copy of which is attached.

Contravention

¶ 2 The Respondent agreed that:

(a) Between August 2017 and October 2021 (the "Relevant Period"), the Respondent did not include proper order designations on numerous orders entered on an IIROC-regulated marketplace as required by UMIR 6.2(1)(b);

(b) The incorrectly designated orders were self-reported to IIROC and the various underlying causes have been remedied by the Respondent; and

(c) During the Relevant Period, the Respondent's internal surveillance and trade supervision in respect of the subject orders was based on erroneous underlying data as was IIROC's ability to effectively perform its market oversight responsibilities in connection with them.

¶ 3 The Respondent admitted that by engaging in the conduct described above, the Respondent committed the following contravention of IIROC's Rules:

Between August 2017 and October 2021, the Respondent failed to include proper order designations on numerous orders entered on an IIROC-regulated marketplace, contrary to UMIR 6.2(1)(b).

Agreed Penalties

¶ 4 The Respondent agreed to:

(a) a fine of $140,000 and costs of $22,500; and

(b) if the Settlement Agreement is accepted by the Hearing Panel, the Respondent agreed to pay the amounts referred to above within 30 days of such acceptance unless otherwise agreed between Staff and the Respondent.

The Role of the Hearing Panel

¶ 5 Under Subsection 8215(5) of the IIROC Rules, the Hearing Panel may only accept or reject the Settlement Agreement. It cannot modify it. In *Re Milewski*[1]*,* referred to by Staff Enforcement Counsel, the District Council stated that:

A District Council considering a settlement agreement will tend not to alter a penalty that it considers to be within a reasonable range, taking into account the settlement process and the fact that the parties have agreed. It will not reject a settlement unless it views the penalty as clearly falling outside a reasonable range of appropriateness. Put another way, the District Council will reflect the public interest benefits of the settlement process in its consideration of specific settlements.

¶ 6 In *Re Johnson*[2]*,* the panel described the standard for reviewing a settlement agreement as follows:

The test applicable to a decision whether to accept or reject a settlement is well-known. Simply put, a panel should accept such an agreement unless it considers the penalty provided for clearly to fall outside a reasonable range of appropriateness.

¶ 7 In *Re Donnelly*[3]*,* the panel observed in accepting a settlement agreement that:

¶ 7 It is usually in the public interest that matters be settled where possible rather than be determined through contested hearings. The reasons for this are often that an earlier determination of a dispute is better than a later determination. Settlements are usually less expensive than contested litigation, and there is less congestion in the dispute settling system when matters are taken out of the system through settlements. Finally, where both parties agree, the result is often more palatable to the parties and society than in a contested hearing where the winner takes all.

¶ 8 For these reasons, a panel considering the acceptance of a settlement agreement will try to reach a determination of acceptance. It will recognize that settlements are often hotly debated with much compromise and give-and-take between the parties in order to reach an acceptable position agreeable to both parties. Furthermore, the panel will recognize that it is not privy to all the facts and the

[1] [1999] I.D.A.C.D. No. 17, at p. 10.
[2] 2012 IIROC 19.
[3] 2016 IIROC 23, at paras. 7, 8 and 29.

motivations and considerations that each of the parties have in coming to a solution of the dispute that is agreeable to them.

…

¶ 29 Where both parties to a settlement agreement are represented by counsel, and have the means to undergo a contested hearing, but have reached a settlement, it is unlikely that a panel would ever conclude that the settlement was unfair and not reasonable.

¶ 8 In determining whether to accept the Settlement Agreement, the Hearing Panel should also be satisfied in respect of the following three considerations described in *Re Donnelly*[4] and cited with approval in *Re Price*[5]*,* each of which we address below:

(a) The agreed penalties must be fair and reasonable, that is, proportional to the seriousness of the contravention, and considering all relevant circumstances;

(b) the agreed penalties must be within an acceptable range, taking into account similar cases; and

(c) the agreed penalties should serve as a deterrent to the Respondent and to industry.

Application to the Facts

¶ 9 In considering whether the agreed penalties are fair and reasonable, we have taken into account:

(a) The circumstances of the contraventions, the causes of the issues, the impact on the market, and the remedial actions taken by the Respondent described in the Settlement Agreement and by counsel for the parties; and

(b) Mitigating factors, including that:

(i) When the Respondent initially discovered the subject-reported issues, it voluntarily reviewed its records of periods of up to six-months prior to the initial discovery date to determine whether any other errors had occurred, and corrected any errors as required;

(ii) The Respondent ensured that technological fixes to correct errors were implemented swiftly or within a reasonable period of time;

(iii) The Respondent self-reported the errors the primary cause of which was technology / software - related. That stated, we note the absence of any description of the nature and extent of the technological / software problems in the Settlement Agreement;

(iv) The order flow for the transactions involving the missing insider significant shareholder designation were part of normal course issuer bids where the issuer was reacquiring its shares in the marketplace. Those completed transactions would be reported otherwise on SEDI, the system for electronic disclosure for insiders, and therefore concern for market integrity did not occur in the subject circumstances. As well, once the orders were corrected, IIROC had the ability to review all the orders that had been made; and

(v) The Settlement Agreement and the agreed penalties are in keeping with IIROC's mandate to set and enforce high quality regulatory and investment industry standards, protect investors and strengthen market integrity while maintaining efficient and competitive capital markets.

¶ 10 Having reviewed the Settlement Agreement and the Settlement Book, filed, and hearing the submissions of counsel for Enforcement Staff and the Respondent, we find that the agreed penalties are fair

[4] *Supra, footnote 3.*
[5] 2017 IIROC 54, at p. 2.

and reasonable, that is, proportional to the seriousness of the contravention, in all the relevant circumstances of this case.

¶ 11 As to whether the agreed penalties are within an acceptable range, we have considered:

(a) IIROC *Sanction Guidelines*, including the Purpose of Sanction Guidelines, Sanction Principles for IIROC Disciplinary Proceedings, and Key Factors in Determining Sanctions, with a focus on:

(i) Factor 1 - The number, size and character of the transactions at issue;

(ii) Factor 3 - Whether the respondent engaged in the misconduct over an extended period of time;

(iii) Factor 5 - Extent of harm to clients or other market participants;

(iv) Factor 6 - Extent of harm to market integrity or the reputation of the marketplace, or both;

(v) Factor 11 - In the case of a Dealer Member, whether the respondent accepted responsibility for and acknowledged the misconduct to the regulator prior to detection and intervention by the regulator; and

(vi) Factor 13 - Whether an individual respondent or Dealer Member respondent voluntarily employed subsequent corrective measures to revise general and/or specific procedures to avoid recurrence of misconduct;

(b) the three cases submitted to us by the parties, *Re IPC Securities*[6]*, Re M Partners*[7] and *Re National Bank Financial, Clarke and O'Reilly*[8]*.* While these cases are not analogous to the subject case - which is a marker identifier case involving mis-marking orders through inadvertence and self-reporting through the gatekeeper system to IIROC - for the purposes of precedent, they do set out helpful general principles about settlement agreements and settlement hearings, and set out specific amounts of penalties, taking into consideration a variety of factors, including the length of time of the occurrences, the magnitude of the contraventions, the technical nature of the violations, and the fact that in those decisions there were supervisory failures, which affords us some measure of guidance and comparison; and

(c) in the subject case, there is no evidence of harm to clients or other market participants, nor is there evidence of harm to market integrity or the reputation of the marketplace, or both. Moreover, in this case, there were no supervisory failures and there were remedial efforts promptly made by the Respondent.

¶ 12 In our view, although the agreed penalties may not be at the high end of the range described in the cases submitted to us by the parties, and there may not be a mathematical calculation that can be provided to support them, they were negotiated and agreed upon by counsel for the parties and they are within a reasonable range of appropriateness, taking into account the IIROC *Sanction Guidelines* and applicable general principles in previous IIROC cases. We so find.

¶ 13 We have also considered whether the agreed penalties would serve as a deterrent to the Respondent and to industry. According to the IIROC *Sanction Guidelines*[9]:

> The purpose of sanctions in a regulatory proceeding is to protect the public interest by restraining future conduct that may harm the capital markets. In order to achieve this, sanctions should be

[6] 2016 IIROC 32.
[7] 2015 IIROC 11.
[8] 2011 IIROC 1.
[9] IIROC *Sanction Guidelines,* February 2, 2015 at paragraph 1 of Part I.

significant enough to prevent and discourage future misconduct by the respondent (specific deterrence), and to deter others from engaging in similar misconduct (general deterrence).

¶ 14 In *Re Mills*[10], the hearing panel stated:

> Industry expectations and understandings are particularly relevant to general deterrence. If a penalty is less than industry understandings would lead its Members to expect for the conduct under consideration, it may undermine the goals of the Association's disciplinary process; similarly, excessive penalties may reduce respect for the process and concomitantly diminish its deterrent effect. Thus the responsibility of the [hearing panel] in a penalty hearing is to determine a penalty appropriate to the conduct and respondent before it, reflecting that its primary purpose is prevention, rather than punishment.

¶ 15 We find on the facts and materials before us that the agreed penalties are appropriate to the conduct at issue and the Respondent, and that they are significant enough to serve as a deterrent to the Respondent and to industry.

Conclusions

¶ 16 For the foregoing reasons, we have concluded that the agreed penalties described in the Settlement Agreement are fair and reasonable, are within an acceptable range, and should serve as a deterrent to the Respondent and to industry.

¶ 17 In consequence, the Hearing Panel has concluded that it is in the public interest for us to accept the Settlement Agreement. And we therefore accept it.

Dated this 2nd day of August 2022.

Marvin J. Huberman

Deborah Leckman

Richard E. Austin

SETTLEMENT AGREEMENT

PART I – INTRODUCTION

1. The Investment Industry Regulatory Organization of Canada ("IIROC") will issue a Notice of Application to announce that it will hold a settlement hearing to consider whether, pursuant to Section 8215 of the IIROC Rules, a hearing panel ("Hearing Panel") should accept the settlement agreement ("Settlement Agreement") entered into between the staff of IIROC ("Staff") and RBC Dominion Securities Inc. ("Respondent").

PART II – JOINT SETTLEMENT RECOMMENDATION

2. Staff and the Respondent jointly recommend that the Hearing Panel accept this Settlement Agreement in accordance with the terms and conditions set out below.

PART III – AGREED FACTS

3. For the purposes of this Settlement Agreement, the Respondent agrees with the facts as set out in Part III of this Settlement Agreement.

Overview

4. Between August 2017 and October 2021 (the "Relevant Period"), the Respondent did not include proper

[10] [2001] I.D.A.C.D. No. 7 at p. 3.

order designations on numerous orders entered on an IIROC-regulated marketplace as required by UMIR 6.2(1)(b).

5. The incorrectly designated orders were self-reported to IIROC and the various underlying causes have been remedied by the Respondent.

6. During the Relevant Period, the Respondent's internal surveillance and trade supervision in respect of the subject orders was based on erroneous underlying data as was IIROC's ability to effectively perform its market oversight responsibilities in connection with them.

Background

7. The Respondent is registered as a Dealer Member and is a Participant under UMIR.

8. Between January 2020 and December 2021, the Respondent filed multiple gatekeeper reports (collectively the "Gatekeeper Reports") with IIROC. Dealer Members are required to file gatekeeper reports to advise the regulator of known (or potential) violations of regulatory requirements.

9. The circumstances of the Gatekeeper Reports are described below.

Gatekeeper Report 1

Circumstances

10. On January 15, 2020[1], the Respondent filed a gatekeeper report ("Gatekeeper Report 1") which indicated that between September 21, 2017 and December 4, 2019, a total of 174,820 executed orders entered on the market for accounts of persons who were insiders or significant shareholders of the issuers of the relevant security did not contain the required order designation ("IA/SS markers").

11. The IA/SS markers were missing across 291 issuers.

12. Gatekeeper Report 1 provided the following summary of executed orders that were missing the IA/SS marker:

- September 21 to December 29, 2017 = 1,193 executed orders in 24 issuers
- January 3 to December 28, 2018 = 15,836 executed orders in 120 issuers
- January 2 to September 24, 2019 = 60,641 executed orders in 103 issuers
- October 11 to October 31, 2019 = 56,916 executed orders in 22 issuers
- November 1 to December 3, 2019 = 40,234 executed orders in 19 issuers

Cause of the Issue

13. A software update to the Respondent's internal trading platform caused IA/SS markers to be removed from client cash orders that were conveyed to the marketplace for execution.

Impact on Market

14. Enforcement Staff performed a detailed analysis of the period from October 11 to December 4, 2019.

15. During this time period, the Respondent entered 113,592 orders that executed on the market which should have included an IA/SS marker. Of these, 16,442 (14.47%) were correctly designated as such and 97,150 (85.53%) were not. The total number of orders entered by all market participants which resulted in trades and contained the IA/SS marker was 400,410. After including the 97,150 executed orders entered by the Respondent that should have included the IA/SS marker, a total of 497,560 executed

[1] And on subsequent dates whereon updates were provided to IIROC

orders ought to have been entered by all market participants with the IA/SS marker. The Respondent's failure to include the IA/SS marker resulted in 19.53% (97,150 / 497,560) of all IA/SS trades not being correctly identified.

16. IIROC Market Surveillance relies on these order designations to monitor the trading activity of insiders and significant shareholders on Canadian marketplaces. In addition to supporting surveillance of UMIR requirements, IIROC's monitoring activity assists the securities regulatory authorities by providing initial detection of possible violations of securities legislation related to insider trading.

17. The Respondent's compliance and supervision system relies on proper order designations; in this context, for alerts designed to detect and prevent potential insider trading.

Remedial Action

18. In January 2020, the Respondent implemented a workaround to prevent the issue from recurring.

19. In addition to the filing of Gatekeeper Report 1, the Respondent submitted individual marker corrections for 18,764 trades to IIROC's Regulatory Marker Correction System ("RMCS"). For the remaining trades between September 21, 2017 and September 24, 2019, RBC filed spreadsheets with corrections, as approved by IIROC.

20. RMCS is not intended to support a secondary method for Dealer Members to report trading and order entry information. Where a trade has been executed and the Dealer Member either reported the wrong identifier or marker on the order or failed to report an identifier or marker when it was required on the order, the Dealer Member is expected to file an RMCS report promptly upon discovering the error.

Gatekeeper Report 2

Circumstances

21. On May 29, 2020, the Respondent filed a gatekeeper report ("Gatekeeper Report 2") which indicated that between October 4, 2019 and March 17, 2020, a total of 782,170 executed orders entered on the market were incorrectly designated as client ("CL") instead of inventory ("IN").

Cause of Issue

22. An update to the Respondent's internal electronic trading platform resulted in the activation of an automated rule that caused orders to be executed with incorrect markers for two of the Respondent's internal accounts.

Impact on Market

23. Between October 4, 2019 and March 17, 2020, the Respondent executed a total of 11,560,088 trades that were marked IN. Accordingly, 6.34% of the Respondent's inventory trades were incorrectly designated as "client".

24. IIROC's Market Surveillance relies on inventory orders being properly designated as such to review for frontrunning, customer principal trading activity and Market Stabilization violations. Incorrectly marked orders bypass the corresponding alert parameters for each of these potential violations.

Remedial Action

25. On March 17, 2020, the Respondent implemented a technical fix. On May 14, 2020, the Respondent increased its sampling review to include all inventory accounts on a monthly rather than quarterly basis.

Gatekeeper Report 3

Circumstances

26. On February 12, 2021, the Respondent filed a gatekeeper report ("Gatekeeper Report 3") which indicated that between August 31, 2019 and March 3, 2021, a total of 96,118executed orders entered on the market did not contain a designation indicating that the orders were Short-Marking Exempt ("SME").

Cause of Issue

27. In August 2019, the Respondent changed applications for its trading platforms. During the migration process to the new application, the SME marker was inadvertently removed from three of Respondent's inventory accounts that belonged to one trader which had previously been hard-coded with the SME marker.

Impact on Market

28. The trades that were missing the SME marker accounted for 0.06% of all of the Respondent's 166,348,402 SME-marked trades between August 31, 2019 and March 3, 2021.. The incorrect order designations existed for over 16 months.

29. IIROC Market Surveillance relies on orders being properly designated with the SME marker for price destabilization alerts. Orders that were missing the SME marker were more likely to have erroneously set off alerts, requiring the review of trades that did not otherwise need to be reviewed.

Remedial Action

30. On March 3, 2021, the Respondent's IT department implemented a fix and the proper SME markers were applied to the three inventory accounts specific to one trader's trading ID. A further fix was implemented on October 6, 2021 to correct an error in the previous fix that had resulted in a further 3,149 executed orders being entered on the market without the SME marker between March 8, 2021 and October 4, 2021.

Gatekeeper Report 4

Circumstances

31. On July 22, 2020, the Respondent filed a gatekeeper report ("Gatekeeper Report 4") which indicated that between March 25 and April 2, 2020, a total of 5,392 executed orders entered on the market were incorrectly designated as non-client ("NC") instead of inventory (IN) orders.

Cause of Issue

32. The Respondent deployed an application change to an internal algorithmic trading system. During this process, an incorrect format was applied to orders entered by one specific trader ID which caused orders to be improperly designated as NC instead of IN.

Impact on Market

33. The improperly designated executed orders accounted for 13.52% of the Respondent's NC trades and 0.82% of the Respondent's IN trades between March 25 and April 2, 2020.

34. IIROC's Market Surveillance relies on non-client orders being properly designated as such to review for potential insider trading and frontrunning activity and client priority. Incorrect order markers may circumvent the alert parameters for each of these potential violations. The Respondent's own internal supervision system relies on proper order designations to detect and prevent potential UMIR violations..

Remedial Action

35. On April 2, 2020, the Respondent corrected the formatting which had caused the incorrect order designations.

36. In addition, on July 22, 2020, the Respondent completed a review for the period from January 2 to June 30, 2020 to ensure there were no additional mismarked trades; none were identified.

Gatekeeper Report 5

Circumstances

37. On November 13, 2020, the Respondent filed a gatekeeper report ("Gatekeeper Report 5") which indicated that between August 10, 2018 and November 6, 2020, a total of 18,387 executed orders were incorrectly designated as client (CL) instead of inventory (IN) orders in an internal account.

Cause of Issue

38. At account inception on August 10, 2018, the account was improperly tagged by the internal electronic trading platform.

Impact on Market

39. The incorrectly designated executed orders resulted in 75 inadvertent wash trades between August 10, 2018 and November 6, 2020.

Remedial Action

40. On November 6, 2020, the Respondent's compliance team identified the incorrect designation and implemented a fix.

Gatekeeper Report 6

41. On December 6, 2021, the Respondent filed a gatekeeper report ("Gatekeeper Report 6") which indicated, among other things, that between February 1 and October 31, 2021, a total of 4,097 orders entered on the market did not contain a designation indicating that the executed orders were SME due to traders mismarking their orders. The impacted trades were reported to IIROC. The Respondent reminded its traders to manually apply the SME marker to their orders.

Other

42. The Respondent filed marker corrections on RMCS in respect of certain Gatekeeper Reports and submitted to the regulator lists of affected trades in respect of other Gatekeeper Reports.

Trading Conduct and Compliance Reviews

43. In 2016 and 2018, IIROC's Trading Conduct and Compliance department ("TCC") noted deficiencies with respect to the Respondent's procedures for detecting order marker errors and ensuring that all order markers were carried through to the marketplace

44. The Respondent took steps and made improvements to its compliance procedures to detect order marker errors as described above. However, the same level of improvement did not occur with respect to the prevention of further order marker errors.

Mitigating Factors

45. When the Respondent initially discovered the above-reported issues, it voluntarily reviewed its records of periods of up to six-months prior to the initial discovery date to determine whether any other errors had occurred, and corrected any errors as required.

46. The Respondent ensured that technological fixes to correct errors were implemented immediately.

PART IV – CONTRAVENTIONS

47. By engaging in the conduct described above, the Respondent committed the following contravention of

IIROC's Rules:

Between August 2017 and October 2021, the Respondent failed to include proper order designations on numerous orders entered on an IIROC-regulated marketplace, contrary to UMIR 6.2(1)(b).

PART V – TERMS OF SETTLEMENT

48. The Respondent agrees to a fine of $140,000 and costs of $22,500.

49. If this Settlement Agreement is accepted by the Hearing Panel, the Respondent agrees to pay the amounts referred to above within 30 days of such acceptance unless otherwise agreed between Staff and the Respondent.

PART VI – STAFF COMMITMENT

50. If the Hearing Panel accepts this Settlement Agreement, Staff will not initiate any further action against the Respondent in relation to the facts set out in Part III and the contraventions in Part IV of this Settlement Agreement, subject to the provisions of the paragraph below.

51. If the Hearing Panel accepts this Settlement Agreement and the Respondent fails to comply with any of the terms of the Settlement Agreement, Staff may bring proceedings under Rule 8200 against the Respondent. These proceedings may be based on, but are not limited to, the facts set out Part III of this Settlement Agreement.

PART VII – PROCEDURE FOR ACCEPTANCE OF SETTLEMENT

52. This Settlement Agreement is conditional on acceptance by the Hearing Panel.

53. This Settlement Agreement shall be presented to a Hearing Panel at a settlement hearing in accordance with the procedures described in Sections 8215 and 8428, in addition to any other procedures that may be agreed upon between the parties.

54. Staff and the Respondent agree that this Settlement Agreement will form all of the agreed facts that will be submitted at the settlement hearing, unless the parties agree that additional facts should be submitted at the settlement hearing. If the Respondent does not appear at the settlement hearing, Staff may disclose additional relevant facts, if requested by the Hearing Panel.

55. If the Hearing Panel accepts the Settlement Agreement, the Respondent agrees to waive all rights under the IIROC Rules and any applicable legislation to any further hearing, appeal and review.

56. If the Hearing Panel rejects the Settlement Agreement, Staff and the Respondent may enter into another settlement agreement or Staff may proceed to a disciplinary hearing based on the same or related allegations.

57. The terms of this Settlement Agreement are confidential unless and until this Settlement Agreement has been accepted by the Hearing Panel.

58. The Settlement Agreement will become available to the public upon its acceptance by the Hearing Panel and IIROC will post a full of copy of this Settlement Agreement on the IIROC website. IIROC will also publish a summary of the facts, contraventions, and the sanctions agreed upon in this Settlement Agreement.

59. If this Settlement Agreement is accepted, the Respondent agrees that neither it nor anyone on its behalf, will make a public statement inconsistent with this Settlement Agreement.

60. The Settlement Agreement is effective and binding upon the Respondent and Staff as of the date of its acceptance by the Hearing Panel.

PART VIII – EXECUTION OF SETTLEMENT AGREEMENT

61. This Settlement Agreement may be signed in one or more counterparts which together will constitute a binding agreement.

62. A fax or electronic copy of any signature will be treated as an original signature.

DATED this "30th" day of "June", 2022.

RBC Dominion Securities Inc.

Per: "Derek Flood"

Name: Derek Flood

Title: Managing Director

I have authority to bind the Corporation.

"Ricki Ann Newmarch"	"Sally Kwon"
Witness	Sally Kwon Senior Enforcement Counsel on behalf of Enforcement Staff of the Investment Industry Regulatory Organization of Canada

The Settlement Agreement is hereby accepted this "20" day of "July", 2022 by the following Hearing Panel:

Per: "Marvin Huberman"
Panel Chair

Per: "Deborah Leckman"
Panel Member

Per: "Richard Austin"
Panel Member