



**Mutual Fund Dealers Association of Canada**  
Association canadienne des courtiers de fonds mutuels

**IN THE MATTER OF A DISCIPLINARY HEARING  
PURSUANT TO SECTIONS 20 AND 24 OF BY-LAW NO. 1 OF  
THE MUTUAL FUND DEALERS ASSOCIATION OF CANADA**

**Re: Lee Scott McIvor**

Heard: May 7, 2020 in Winnipeg, Manitoba

Decision: May 7, 2020

Reasons for Decision: July 13, 2020

**REASONS FOR DECISION**

Hearing Panel of the Prairie Regional Council:

Sherri Walsh  
Danielle Tétrault  
Greg Wiebe

Chair  
Industry Representative  
Industry Representative

Appearances:

Justin Dunphy

) Enforcement Counsel for the Mutual Fund  
) Dealers Association of Canada  
)

Lee Scott McIvor

) Respondent, not in attendance or represented by  
) counsel  
)

## I. INTRODUCTION

1. On July 29, 2019, the Mutual Fund Dealers Association of Canada (“MFDA”) issued a Notice of Hearing pursuant to sections 20 and 24 of MFDA By-law No. 1 in respect of a disciplinary proceeding commenced against Lee Scott McIvor (the “Respondent”), which alleged:

**Allegation No. 1:** Commencing July 2018, the Respondent failed to cooperate with the MFDA’s investigation into his conduct, contrary to section 22.1 of MFDA By-law No. 1.

2. The first appearance in this matter was held on September 17, 2019.

3. Despite having received the appropriate notice, the Respondent did not attend the appearance nor did anyone participate on his behalf. Following that appearance, the Hearing Panel (the “Panel”) issued an Order setting the date for the hearing on its merits and stating that the Respondent could appear by teleconference.

4. The hearing of the matter on its merits was held on January 30, 2020.

5. The Respondent attended via teleconference but at the outset of the hearing he asked the Panel for an adjournment. He said that he had retained legal counsel to represent him in these proceedings, however, his counsel was currently out of the country.

6. Enforcement Counsel raised concerns about the Respondent’s request, citing a number of grounds including the fact that the request was made only minutes before the hearing was to proceed and the fact that Enforcement Counsel had not received any communications from the counsel the Respondent said he had retained.

7. After deliberating, the Panel granted the Respondent’s request for an adjournment and set a date of February 13, 2020 for a teleconference to be attended by all the parties, the purpose of which was to set new dates for the hearing on the merits, and a schedule for the Respondent to file a Reply and for the parties to exchange disclosure.

8. At the appearance on February 13, 2020, however, no one appeared on behalf the Respondent – neither the Respondent – nor counsel acting on his behalf.

9. Following that appearance, the Panel issued an Order setting a new date for the hearing of the matter on its merits – May 7, 2020 - as well as dates for the Respondent to file and serve a Reply and for Staff and the Respondent to exchange documentary disclosure.

10. The Order also provided that the parties could re-attend before the public representative of the Hearing Panel via teleconference prior to the hearing of the matter on its merits, for the purpose of hearing and determining any procedural matter or motion relating to the conduct of the Disciplinary Hearing.

11. Accordingly, on April 20, 2020 at Staff’s request, the Panel held a hearing via videoconference to hear Staff’s submissions regarding scheduling and other procedural matters. Despite having been given proper notice of the appearance neither the Respondent nor anyone on his behalf participated.

12. Following that appearance, the Panel ordered that the hearing on the merits would take place by electronic hearing – video conference - in order to accommodate the extraordinary circumstances arising from the COVID-19 pandemic, including the need to practise physical distancing.

## **II. HEARING ON ITS MERITS**

13. On May 7, 2020, the Panel convened the Discipline Hearing “the hearing” by way of videoconference.

14. The Respondent did not attend the hearing; nor did anyone attend on his behalf. At the beginning of the proceedings, Enforcement Counsel advised the Panel that the Respondent sent him an email on May 6, 2020, the day before the hearing, saying that he would not be attending the hearing “... tomorrow or at any future dates.”

15. The Panel requested that this email be entered into evidence because it confirmed that the Respondent was receiving communications from Enforcement Counsel at the email address Staff had been relying upon and it confirmed Staff’s advice to the Panel that the Respondent did not intend to participate in these proceedings.

16. In admitting the email from the Respondent into evidence the Panel relied on the MFDA Rules of Procedure and in particular Rule 1.6 relating to admissibility of evidence. The Rule reads as follows:

***1.6 Admissibility of Evidence***

(1) Subject to sub-Rule (3), a Panel may admit as evidence any testimony, document or other thing, including hearsay, which it considers to be relevant to the matters before it and is not bound by the technical or legal rules of evidence.

(2) A Panel may admit a copy of any document or other thing as evidence if it is satisfied that the copy is authentic.

(3) Nothing is admissible in evidence which would be inadmissible by reason of a statute or a legal privilege.

**The Respondent's Failure to Attend the Hearing**

17. MFDA Rule of Procedure 7.3 provides that a Hearing Panel may proceed with a hearing on the merits in the absence of a respondent:

***7.3 Failure to Attend Hearing***

(1) Where a Respondent fails to attend the hearing on the date and at the time and location specified in the Notice of Hearing, the Hearing Panel may:

(a) proceed with the hearing without further notice to and in the absence of the Respondent; and

(b) accept the facts alleged and conclusions drawn by the Corporation in the Notice of Hearing as proven and impose any of the penalties and costs described in sections 24.1 and 24.2 respectively of MFDA By-law No. 1.

18. Further, MFDA Rule of Procedure 13.5 states:

***13.5 Where a Respondent Fails to Attend a Disciplinary Hearing***

(1) Where a Respondent, having been served with a Notice of Hearing, fails to attend the hearing of the proceeding on its merits, the Hearing Panel may proceed in accordance Rule 7.3 [*sic*].

19. On the basis of these authorities, and knowing that not only was the Respondent not in attendance but that he had advised Enforcement Counsel that he had no intention of participating in the proceedings, the Panel proceeded with the hearing notwithstanding the Respondent's absence.

## **MFDA Jurisdiction Over the Respondent**

20. The Respondent was registered as a mutual fund sales person with Sun Life Financial Investment Services (Canada) Inc. (the “Member” or “Sun Life”) in the following provinces, during the following time periods:

- a) In Manitoba, from March 1996 until February 2017;
- b) In Ontario, Saskatchewan and Alberta until October 2016; and
- c) In British Columbia, from December 2012 until March 2017.

21. He conducted business in a branch located in the Thompson, Manitoba area until December 2012, after which time he conducted business in the Kelowna, British Columbia area.

22. As at the time of these proceedings the Respondent was not registered in the securities industry in any capacity.

23. As a mutual fund dealing representative in Manitoba and an Approved Person of a Member of the MFDA until March 2017, the Respondent was bound by and agreed to observe and comply with the MFDA Rules.

24. The MFDA retains jurisdiction over the Respondent despite the fact that he is no longer registered, pursuant to section 24.1.4 of MFDA By-law No. 1 which reads as follows:

### ***24.1.4 Jurisdiction***

(a) *Former Members.* For the purposes of Sections 20 to 24 inclusive, any Member, Approved Person or other person subject to the jurisdiction of the Corporation shall remain subject to the jurisdiction of the Corporation notwithstanding that such Member has ceased to be a Member, Approved Person or other person subject to the jurisdiction of the Corporation.

## **Hearsay Evidence and Evidence by Sworn Statement**

25. The primary evidence before the Panel consisted of an Affidavit sworn by Allison Howse, on January 22, 2020. Ms. Howse is Manager of Investigations in the Prairie Region.

26. As cited above, MFDA Rule of Procedure 1.6(1) specifically permits hearsay statements to be admitted as evidence:

### ***1.6 Admissibility of Evidence***

(1) Subject to sub-Rule (3), a Panel may admit as evidence any testimony, document or other thing, including hearsay, which it considers to be relevant to the matters before it and is not bound by the technical or legal rules of evidence.

27. Similarly, MFDA Rule of Procedure 13.4 permits evidence to be adduced by way of sworn statements:

### ***13.4 Evidence by Sworn Statement***

(1) The Hearing Panel may allow the evidence of a witness or proof of a particular fact or document to be given by sworn statement unless an adverse party reasonably requires the attendance of the witness at the hearing for cross-examination.

28. It is well established that MFDA Hearing Panels and other regulatory bodies routinely consider and rely on both hearsay and affidavit evidence in making findings of fact.

***Tonnies (Re), MFDA File No. 200503, Hearing Panel of the Prairie Regional Council, Decision and Reasons dated June 27, 2005 at paras 10-12***

29. Ms. Howse was, however, also called to testify at the hearing.

### **Allegation No. 1 Proven**

30. There was only one allegation made against the Respondent in the Notice of Hearing:

**Allegation No. 1:** Commencing July 2018, the Respondent failed to cooperate with the MFDA's investigation into his conduct, contrary to section 22.1 of MFDA By-law No. 1.

31. The Panel finds that the charge of failing to cooperate was clearly proven by the MFDA through the Affidavit and testimony of Ms. Howse.

32. Her evidence established that on or about August 20, 2017, Staff commenced an investigation into the Respondent's conduct as a result of a report filed by Sun Life on the Member Event Tracking System ("METS"). Sun Life advised Staff that a client serviced by the Respondent complained that the Respondent had borrowed \$40,000.00 from them which the Respondent failed to repay and had borrowed a total of \$490,000.00 from two other clients.

33. As part of her investigation Ms. Howse interviewed the Respondent on June 21, 2018 via teleconference. A copy of the transcript from that interview was attached as an exhibit to her Affidavit.

34. The transcript shows that the Respondent confirmed his contact information including his email address, mailing address and cellphone number.

35. Following the interview, and as part of her investigation Ms. Howse sent additional requests for information to the Respondent.

36. Indeed, between July 5, 2018 and September 19, 2018 Staff sent multiple requests for documentation to the Respondent, including requesting, among other things, copies of the Respondent's bank statements.

37. Staff's methods of communicating with the Respondent included ordinary mail, registered mail, email, telephone messages and personal service.

38. The Respondent failed to reply to all of Staff's requests and communications.

39. Based on Ms. Howse's evidence, the Panel has no doubt that the Respondent failed to cooperate with Staff's investigation of his conduct and has, therefore, contravened section 22.1 of MFDA By-law No. 1.

40. Pursuant to section 21 of MFDA By-law No. 1, the MFDA has a duty to conduct examinations and investigations of a Member, an Approved Person and any other person under its jurisdiction as it considers necessary or desirable in connection with any matter related to that Member, or Approved Person's compliance with, among other things, the By-laws, Rules and Policies of the MFDA.

41. In carrying out this duty, the MFDA is authorized to request and oblige a Member, Approved Person or any other person under its jurisdiction to:

- a) Submit a report in writing with regard to any matter involved in any investigation;
- b) Produce for investigation and provide copies of the books, records and accounts of such person relevant to the matters being investigated;

- c) Attend and give information respecting such matters; and
- d) Make any of the above information available through any directors, officers, employees, agents and other persons under the direction or control of the Member, Approved Person or other person under the jurisdiction of the MFDA.

**Section 22.1 of MFDA By-law No. 1**

42. Section 22.1 is also clear in requiring that the Member, Approved Person or other person under investigation is obliged to cooperate with the examination and investigation the MFDA conducts in accordance with its duty under section 21.

43. The authorities are clear that an Approved Person must provide Staff with information and documentation when requested to do so. To hold otherwise would hinder the MFDA's ability to investigate the conduct of registrants in the mutual fund industry and would prevent the MFDA from fulfilling its regulatory mandate to protect the public.

***Armani (Re)*, MFDA File No. 201701, Hearing Panel of the Central Regional Council, Decision and Reasons dated August 3, 2017 at para 9**

***Rholyn St. George Hylton (re)*, MFDA File No. 201829, Hearing Panel of the Central Regional Council, Decision and Reasons dated October 30, 2018 at para 10**

44. Further, as Enforcement Counsel submitted, there is ample authority for the proposition that when an Approved Person fails to provide documentation to Staff, even after participating in an interview, such conduct is considered a failure to cooperate.

45. In this regard, Counsel referred the Panel to a decision of the Hearing Panel of the Central Regional Council: *Re Vitich* where, much like the circumstances in this case, although the Respondent attended an interview with Staff, he failed to comply with an undertaking to provide Staff with a number of documents following that interview.

46. The Panel in that case stated:

...

54. Failure to cooperate with an investigation, even where, as here, the failure is not total, is a matter which goes to the very heart of MFDA's ability to attempt to protect

investors, maintain capital market efficiency and ensure public confidence in the system. Over twenty years ago, the Ontario Divisional Court, in *Artinian v. College of Physicians and Surgeons of Ontario* (1990), 73 O.R. (2d) 704, said:

... every professional has an obligation to cooperate with his/her self-governing body.

55. There can be no exceptions to that obligation. The fulfillment of that obligation is particularly important to the MFDA because it has no statutory power to search and seize or to compel the production of documents. Without the cooperation of Members and Approved Persons, the MFDA's ability to investigate and discipline its Members and Approved Persons is gravely fettered.

...

56. This Hearing Panel cannot overstate the importance of cooperation with an investigation. We think that it is necessary that Members and Approved Persons understand that any failure to cooperate with an investigation will likely attract severe sanctions.

***Vitch (Re)*, MFDA File No. 201103, Hearing Panel of the Central Regional Council, Decision and Reasons dated September 22, 2011 at paras 54 - 56**

47. In the present case, the evidence established that the Respondent has failed to submit information and documents requested by Staff during the course of the investigation into his conduct.

48. The Panel finds that there is no doubt that the Respondent was aware that Staff was requesting further information from him following the interview he attended on June 21, 2018.

49. His conduct in this case has, therefore, prevented Staff from determining the full nature and extent of his activities. The conduct being investigated involved borrowing funds from the Respondent's clients. This conduct creates a serious conflict of interest and is not permitted by the MFDA Rules and Regulations. Because the Respondent did not produce the documents and information requested, including access to his bank statements, the MFDA has been unable to confirm the extent of his personal financial dealings with clients.

50. Accordingly, the Panel finds that the allegation set out in the Notice of Hearing has been proven and that by failing to cooperate with the MFDA's investigation into his conduct, the Respondent has contravened section 22.1 of MFDA By-law No. 1.

### **III. PENALTY**

51. Pursuant to section 24.1.1(i) of MFDA By-law No. 1, if in the opinion of a Hearing Panel an Approved Person has failed to comply with the provisions of any By-law, Rule or Policy of the MFDA, the Hearing Panel can impose any of the penalties set out in section 24.1.1(a)-(f).

52. Enforcement Counsel proposed the following penalties be levied against the Respondent:

- a) A permanent prohibition on the authority of the Respondent to conduct securities related business while in the employ of or associated with any Member of the MFDA, pursuant to section 24.1.1(e) of MFDA By-law No. 1; and
- b) A fine of at least \$75,000.00 pursuant to section 24.1.1(b) of MFDA By-law No. 1.

53. The issue of costs will be addressed later in these Reasons.

#### **Factors Concerning the Appropriateness of the Proposed Penalty**

54. The primary goal of securities regulation is protection of the investor.

*Pezim v British Columbia (Superintendent of Brokers)*, [1994] 2 SCR 557 (SCC) at paras 59 and 68

55. In addition to protection of the public, the goals of securities regulation include fostering public confidence in the capital markets and in the securities industry.

*Pezim, supra*, at paras 59 and 68

56. When determining whether a penalty is appropriate, the Hearing Panel should consider:

- a) Protection of the investing public;
- b) Integrity of the security markets;
- c) Specific and general deterrence;
- d) Protection of the MFDA's membership; and
- e) Protection of the integrity of the MFDA's enforcement processes.

*Tonnies (Re), 2005 LNCMFDA 7 at para 46*

57. Hearing Panels also frequently consider the following factors when determining the appropriateness of a proposed penalty:

- a) The seriousness of the allegations proved against the Respondent;
- b) The Respondent's experience in the capital markets;
- c) The level of the Respondent's activity in the capital markets;
- d) The harm suffered by investors as a result of the Respondent's activities;
- e) The benefits received by the Respondent as a result of the improper activity;
- f) The risk to investors and the capital markets in the jurisdiction, were the Respondent to continue to operate in capital markets in the jurisdiction;
- g) The damage caused to the integrity of the capital markets in the jurisdiction by the Respondent's improper activities;
- h) The need to deter not only those involved in the case being considered, but also any others who participate in the capital markets, from engaging in similar improper activity;
- i) The need to alert others to the consequences of inappropriate activities to those who are permitted to participate in the capital markets; and
- j) Previous decisions made in similar circumstances.

*Breckenridge (Re), MFDA File No. 200708, Hearing Panel of the Central Regional Council, Decision and Reasons dated November 14, 2007 at para 77*

**MFDA Sanction Guidelines**

58. On November 15, 2018, the MFDA issued Sanction Guidelines to assist Staff and Respondents in conducting disciplinary proceedings and negotiating settlement agreements as well as to assist Hearing Panels in imposing fair and efficient sanctions in settled or contested disciplinary proceedings.

59. These Guidelines are not mandatory but as their name suggests, provide guidance to a Hearing Panel.

60. Relying on excerpts from the MFDA Sanction Guidelines, Staff submitted that the following factors are relevant to the Panel's decision in this case:

- a) The seriousness of the allegations proved against the Respondent;
- b) The Respondent's past conduct, including prior sanctions;
- c) Failure to recognize the seriousness of the misconduct;
- d) General and specific deterrence; and
- e) Public confidence.

### **Application in the Present Case**

#### **Seriousness of the proven misconduct**

61. The Panel agrees with Enforcement Counsel's submissions that the misconduct in this case is extremely serious. By failing to cooperate with Staff in the course of its investigation into his conduct the Respondent has hindered Staff's ability to provide effective oversight of the mutual fund industry.

#### **The Respondent's past conduct and experience in the capital markets**

62. The Respondent was registered as a mutual fund sales person from March 1996 until March 2017. As an experienced person in the industry, he knew or ought to have known of the requirement to cooperate with the MFDA's investigation into his conduct.

63. It is also a matter of public record that the Respondent was the subject of a previous MFDA disciplinary hearing, in MFDA File No. 201828 dealing with pre-signed, altered and re-used account forms. In that hearing, which proceeded uncontested, the Panel imposed a penalty consisting of a \$30,000.00 fine and \$7,500.00 costs.

*McIvor (Re), MFDA File No. 201828, Hearing Panel of the Prairie Regional Council, Reasons for Decision dated May 6, 2020*

64. In the Panel's view, the Respondent's record of past conduct demonstrates his previous disregard for regulatory requirements and is considered to be an aggravating factor.

#### **MFDA Sanction Guidelines**

**Remorse or recognition by the Respondent of the seriousness of the misconduct**

65. By failing to participate in these proceedings, the Respondent has shown neither recognition of the seriousness of his misconduct; nor remorse for his actions.

**Deterrence**

66. Both the Supreme Court of Canada and MFDA Hearing Panels have held that deterrence is an appropriate factor to be taken into account when determining an appropriate penalty.

*Cartaway Resources Corp. (Re)*, [2004] 1 SCR 672 (SCC) at paras 52-62  
*Tonnies (Re)*, *supra*, at para 47

67. As the Supreme Court identified, the effect of general deterrence should advance the goal of protecting investors. The penalty levied should be sufficient so as to affirm public confidence in the regulatory system and ensure that the misconduct is not repeated by others in the industry:

A penalty that is meant to deter generally is a penalty that is designed to keep an occurrence from happening; it discourages similar wrongdoing in others. In a word, a general deterrent is preventative. It is therefore reasonable to consider general deterrence as a factor, albeit not the only one, in imposing a sanction ... The respective importance of general deterrence as a factor will vary according to the breach of the Act and the circumstances of the person charged ...

*Cartaway Resources Corp., supra*, at para 61

68. The only mitigating factor submitted by Enforcement Counsel was that there is no evidence of client harm. On this point, however, the Panel notes that Staff's ability to investigate whether there was any evidence of client harm, was impeded by virtue of the Respondent's misconduct in failing to cooperate. To the extent that Enforcement Counsel submitted that the lack of evidence of client harm could be considered a mitigating factor, therefore, the Panel has not been persuaded that that is the case.

69. Enforcement Counsel submitted that the proposed penalties are necessary in order to communicate to other Approved Persons that failing to cooperate with Staff is serious misconduct that has no place in the mutual fund industry.

70. Enforcement Counsel further submitted that by virtue of his conduct the Respondent has demonstrated a disregard for the mutual fund industry and the protections put in place to ensure investor protection. He is, therefore, ungovernable and poses a significant risk to other investors and the market at large if he were allowed to return to the industry.

71. Enforcement Counsel referred the Panel to the following decisions made by MFDA Hearing Panels in similar circumstances where the penalties ranged from \$50,000.00 to \$75,000.00:

- *Armani (Re)*, MFDA File No. 201701, Hearing Panel of the Central Regional Council, Decision and Reasons dated August 3, 2017;
- *Dickson (Re)*, MFDA File No. 201728, Hearing Panel of the Central Regional Council, Decision and Reasons dated November 13, 2017;
- *Rholyn St. George Hylton (Re)*, MFDA File No. 201829, Hearing Panel of the Central Regional Council, Decision and Reasons dated October 30, 2018; and
- *McBurney (Re)*, MFDA File No. 201522, Hearing Panel of the Central Regional Council, Decision and Reasons dated December 29, 2015.

72. In each of these decisions the Respondent failed to attend an interview or submit information and documents requested by Staff during the course of its investigation into their conduct. In cases where the higher fine of \$75,000.00 was ordered, the Hearing Panel commented on the seriousness of the underlying misconduct the investigation of which was subverted by the Respondent's failure to cooperate with the MFDA's investigation.

73. Enforcement Counsel submitted that the proposed penalty of \$75,000.00 was necessary in this case in order to communicate to other Approved Persons that failing to cooperate with MFDA Staff is serious misconduct that has no place in the mutual fund industry. In making this submission he referenced the decision in *Rholyn St. George Hylton* where the Panel stated that a failure to co-operate with an investigation by Staff "... ranks among the most serious forms of misconduct that an Approved Person can engage in".

***Rholyn St. George Hylton (Re)*, supra, at para.15**

#### **IV. DECISION**

74. Having considered the evidence submitted before us and the written and oral submissions of Enforcement Counsel, as set out above, the Panel finds that the allegation set out in the Notice of Hearing is proven. The Panel further agrees that the penalty that Enforcement Counsel has proposed is appropriate.

75. We find that the Respondent is ungovernable and that in order to protect the public and the integrity of the industry as a whole, he must be prohibited from conducting securities related business in any capacity while in the employ of or associated with any MFDA Member.

76. The Panel agrees that within the range of the penalties imposed in similar cases, this matter requires the imposition of a higher penalty for two reasons:

- a) The Respondent's discipline record - this is the second time an MFDA Hearing Panel has found him guilty of misconduct; and
- b) The seriousness of the underlying conduct that gave rise to the allegation in these proceedings.

77. With respect to the second reason, the Panel is of the view that there is a correspondence between the seriousness of conduct which is the subject matter of an investigation and a Respondent's failure to cooperate in the investigation of that misconduct. Approved Persons and Members should not be able to disregard their obligation to cooperate with Staff who are conducting an investigation, as a means of avoiding responsibility for the underlying misconduct.

78. The penalty for failing to cooperate in an investigation must send a message to Approved Persons and Members that failing to cooperate cannot simply become part of the "cost of doing business" or a means to avoid responsibility for perpetrating misconduct.

#### **Costs**

79. When the hearing on its merits was first held on January 30, 2020, Enforcement Counsel had proposed an award of costs in the amount of \$7,500.00.

80. However, by the time this matter was ultimately heard on May 7, 2020, Enforcement Counsel increased that request to \$10,000.00.

81. In support of that increase he pointed out that because of the manner in which the Respondent conducted himself in these proceedings, Staff incurred a number of what were ultimately unnecessary expenses including travelling to Winnipeg for the hearing on January 30, 2020 which did not proceed.

82. Counsel provided the Panel with a draft Bill of Costs in the amount of \$8,937.50 which, he submitted, did not account for all of the time and disbursements attributable to these protracted proceedings.

83. The Panel agrees that the Respondent's conduct in these proceedings, as outlined above, has caused unnecessary delay, effort and costs. Accordingly, we order that the Respondent must pay costs in the amount of \$10,000.00.

84. For all the reasons set out above, the Panel imposes the following penalty on the Respondent:

- a) A permanent prohibition from conducting securities related business in any capacity when in the employ of or associated with any MFDA Member, pursuant to section 24.1.1(e) of MFDA By-law No. 1;
- b) A fine in the amount of \$75,000.00 pursuant to section 24.1.1(b) of MFDA By-law No. 1; and
- c) Costs of this proceeding in the amount of \$10,000.00 pursuant to section 24.2 of MFDA By-law No. 1.

**DATED** this 9<sup>th</sup> day of July, 2020.

“Sherri Walsh”

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Sherri Walsh  
Chair

“Danielle Tétrault”

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Danielle Tétrault  
Industry Representative

“Greg Wiebe”

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Greg Wiebe  
Industry Representative

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