



**CIRO · OCRI**

Canadian Investment  
Regulatory  
Organization

Organisme canadien  
de réglementation  
des investissements

# Enforcement Report

2023-2024

**en·force·ment**

*/in'fôrsm(ə)nt, en'fôrsm(ə)nt/*

**noun**

*the act of compelling observance of or  
compliance with a law, rule, or obligation*

# Table of Contents

## 01

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<b>Introduction</b>	<b>4</b>
Message from the Vice-Presidents	6
The Role of Enforcement	8

## 02

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<b>Year in Review</b>	<b>10</b>
Enforcement Year	11
Selected Case Highlights	14

## 03

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<b>Statistics</b>	<b>16</b>
Sanctions Imposed	17
Investment Dealers	17
Mutual Fund Dealers	17
Collection Rate	18
Investment Dealers	18
Complaints	18
Investigations	19
Enforcement Proceedings	20
Mutual Fund Dealers	22
Complaints	22
Investigations	23
Enforcement Proceedings	24

## 04

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<b>Proceedings</b>	<b>26</b>
Investment Dealers	27
Mutual Fund Dealers	32

# Introduction



## Message from the Vice-President, Enforcement and the Vice-President, Complaint Intake and Operations

We are pleased to share CIRO's 2023-2024 Enforcement Report for the fiscal year 2024 (April 1, 2023, to March 31, 2024). Enforcement is a key lever in protecting investors, improving industry standards and strengthening market integrity.

### Regulatory Evolution

We want to thank Enforcement staff for their tremendous work in pursuing cases with fairness and professionalism even through transformation, as CIRO continues the work of harmonizing operations, systems and technologies of the predecessor organizations, the Investment Industry Regulatory Organization of Canada (IIROC) and the Mutual Fund Dealers Association of Canada (MFDA). This report highlights the achievements and efforts of the Enforcement team, as well as the processes by which CIRO protects investors and ensures market integrity.

While efforts continue integrating systems and technologies, Enforcement delivered on our core priorities to consolidate the enforcement programs of the two predecessor organizations to permit us to move toward regulatory evolution and efficiency.

### Harmonizing our Regulatory Approach

We unified enforcement decision-making across investment dealer and mutual fund rule cases to promote consistency in the cases we take forward from investigation to formal proceedings. Enforcement staff will continue to conduct thorough evaluations of all cases, prioritizing those with serious misconduct and the greatest potential harm to investors and the markets. This ensures we focus our finite resources on those cases that have the greatest deterrent impact and send the strongest regulatory message.

Effective February 1, 2024, we adopted and harmonized [Sanction Guidelines](#) and [Enforcement Staff Policy Statements](#), replacing all previous versions for Investment Dealers and Mutual Fund Dealers. The Sanction Guidelines clearly set out the general principles and key factors for determining an appropriate sanction that now apply to all CIRO enforcement matters, based on general principles of administrative and securities law. While the principles and key factors are not exhaustive, and hearing panels may consider other applicable principles, the Sanction Guidelines promote consistency, fairness and transparency, as well as the general approach that should be taken in approaching decisions on sanction.

### Protecting Investors

We also implemented a [centralized intake process](#) for all public complaints and inquiries that simplifies the process for investors and ensures it remains easily accessible. As part of our commitment to protect investors, we worked with CIRO's Office of the Investor to publish a new [How to Make a Complaint](#) brochure for investors. This new brochure consolidates the previous IIROC and MFDA complaint brochures into one streamlined document ensuring investors have a single comprehensive source for all information related to the complaints process.

Finally, we would like to extend thanks to our valued stakeholders including industry and investor organizations. We value our relationships and dialogue with the Canadian Securities Administrators (CSA), and their provincial and territorial governments, as well as other regulatory authorities with whom we collaborate.

We are honored to work together to protect investors, helping them meet their financial goals, while also ensuring the integrity of Canada's capital markets.



*Charles Corlett*

**Charles Corlett**  
Vice-President,  
Enforcement



*Charles Toth*

**Charles Toth**  
Vice-President, Complaint  
Intake and Operations

# The Role of Enforcement

Enforcement is responsible for investigating and commencing proceedings against Dealer Members and their Approved Persons, while striving to be fair, effective and timely.

Effective enforcement requires coordinated and cooperative efforts among regulators and other agencies. Where Enforcement detects any potential violations of provincial securities acts, we refer such matters to the relevant Canadian Securities Administrators (CSA) jurisdiction.

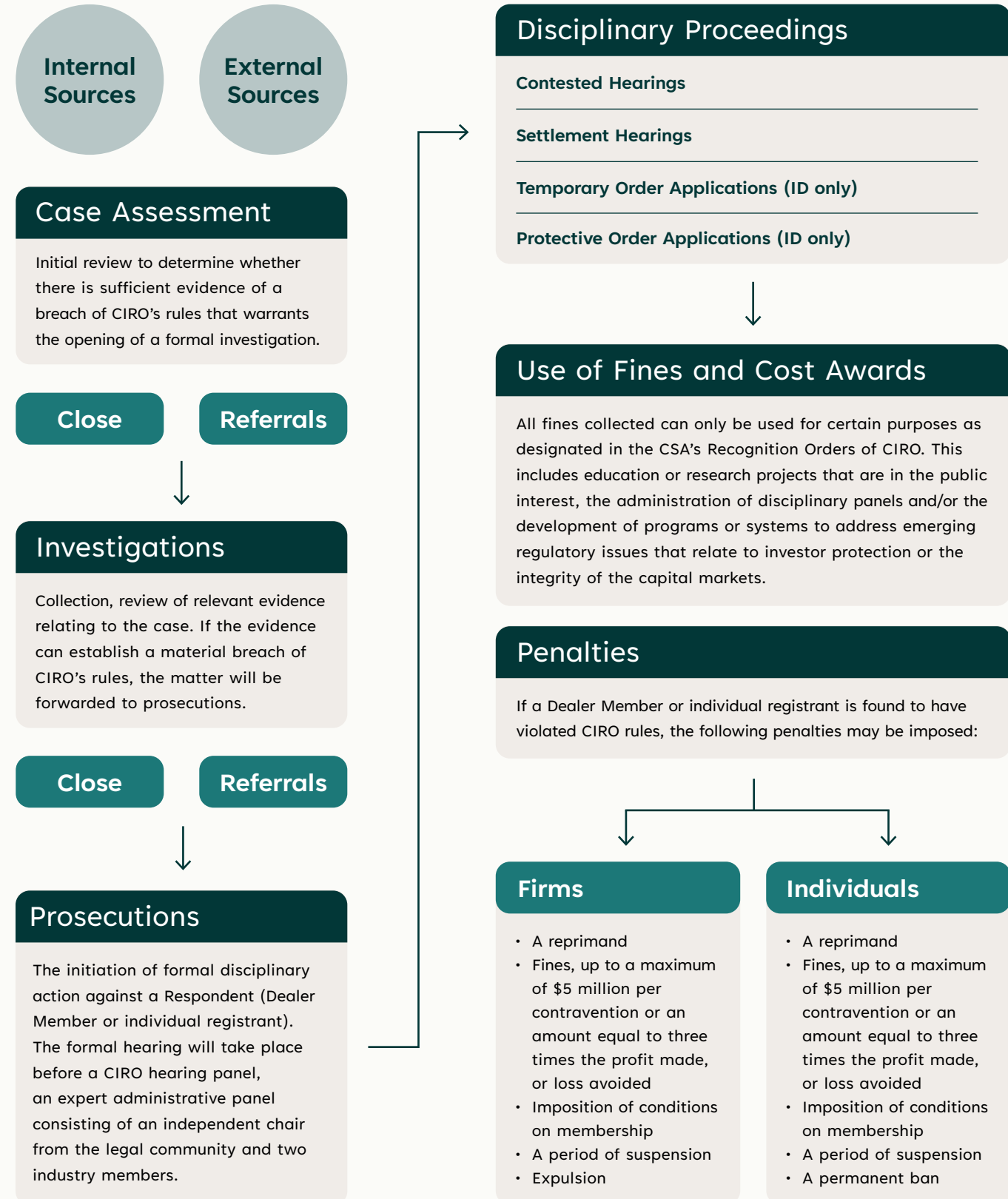
The CSA is the council of 10 provincial and three territorial securities regulators in Canada, with the mission to facilitate Canada’s securities regulatory system by protecting investors from unfair fraudulent practices and by promoting fair, efficient and transparent markets through the development of harmonized securities regulations, policies and practices.

In certain circumstances, we work collaboratively with CSA jurisdictions on matters of mutual interest. We also make referrals to other domestic or foreign regulators and agencies and, if there is evidence of potential criminal activity, to the police.

Enforcement files may be opened from a variety of sources.

External case sources come to us through public complaints, CIRO’s whistleblower service, the Complaints and Settlement Reporting System (COMSET), the Member Event Tracking System (METS), referrals from outside public agencies such as securities commissions, other securities regulators provincially and internationally, police and others.

Enforcement also receives case referrals from internal sources and departments at CIRO including Complaints and Inquiries, Registration, Business Conduct Compliance (BCC), Financial & Operations Compliance (FinOps), Trading Conduct Compliance (TCC), Trading Review & Analysis (TR&A) and Market Surveillance.



# Year In Review

Enforcement cases covered a wide range of issues and misconduct.<sup>1</sup> The cases highlighted below represent our commitment to our mandate – to protect investors from unfair, improper, or fraudulent practices by Dealer Members, to foster fair and efficient capital markets, and to promote market integrity, ultimately working to enhance public confidence in Canada’s capital markets. In pursuing this mandate, our goal is to identify and pursue cases that will have the greatest deterrent impact and send the strongest regulatory message.

The cases we pursued in 2024 resulted in CIRO hearing panels imposing over \$14 million in fines, disgorgement, and costs for contraventions of CIRO requirements. Hearing panels ordered suspensions and permanent prohibitions in a significant proportion of the proceedings against individuals. These sanctions demonstrate that the impact of our proceedings is significant and that we are targeting our resources to the most significant cases with the most deterrent value.

Although most cases are resolved by way of settlement agreement, where a negotiated resolution is not achievable, we are always prepared to advance our allegations in contested hearings and will not hesitate to do so. This year saw an uptick in the number of contested hearings alleging contraventions of the Investment Dealer Rules and Universal Market Integrity Rules (UMIR). Although litigating these cases is resource intensive, contested hearings are a vital part of the enforcement process, offering an opportunity to have important regulatory principles and rules adjudicated by an impartial and expert tribunal.

As in past years, we are focused on improving our timeliness in bringing forward cases without compromising fairness or effectiveness. Our view is that the closer in time a case can be brought to the misconduct at issue the greater impact and deterrent value it will have. Timely enforcement is critical to meeting our priorities – to protect investors, to improve industry standards and market integrity and, therefore, to strengthen confidence in self-regulation. As we continue the work of integrating the Enforcement programs of the predecessor organizations, we will look to continually improve our timeliness in advancing cases.

Although the sources of complaints and the number of investigations and proceedings completed provide some insight into our achievements, a successful enforcement program should not measure success simply by the quantitative numbers, but assess the quality of the specific cases brought and the impact of those proceedings. Were wrongdoers prohibited from being in the industry? Have the causes of the rule breach been corrected? Will the proceeding serve to deter others and act as a warning to other potential wrongdoers not to engage in similar misconduct?

Where CIRO detects any potential market-related violations by clients of CIRO-regulated firms, we refer such matters to the relevant CSA jurisdiction. Both CIRO’s Enforcement and Trade Review & Analysis departments work with CSA jurisdictions on matters of mutual interest. In FY24, Trade Review & Analysis referred 59 market-related cases to the CSA: Manipulation (23), Insider Trading (17) and other Securities Act Violations (19).

<sup>1</sup> Please see Proceedings for the complete list of Enforcement proceedings and the sanctions imposed in FY24.

# Selected Case Highlights

## Protecting Investors from Unfair, Improper or Fraudulent Practices

CIRO requires that Approved Persons and Dealer Members treat their clients honestly and fairly and observe high standards of business conduct to maintain investor confidence in securities markets.

**Fortrade Canada** made recommendations for contracts for difference, a high-risk product, to unsophisticated retail clients through email and telephone. Fortrade, as an order execution only dealer, is prohibited from providing recommendations to clients. Moreover, the firm failed to establish and maintain a supervisory system that was reasonably designed to achieve compliance with CIRO requirements. The firm also failed to retain adequate records to demonstrate compliance with its supervisory obligations. In November 2022, Enforcement brought an application for an order to restrict Fortrade's business to prevent the continuing misconduct. Subsequently, Enforcement and Fortrade reached a settlement. Fortrade paid a \$2 million CAD fine, agreed to payment of \$703,478,91 USD to clients who complained to CIRO about receiving recommendations, and established a fund of \$6 million USD to be used to make payments to clients who suffered a net loss in their accounts. In addition, Fortrade agreed to several remedial measures to prevent a reoccurrence of the misconduct. In accepting the settlement, the hearing panel noted that "the emphasis upon the return of funds to clients is appropriate, given the circumstances surrounding the loss of those funds."

**Paul O'Brian Walker**, a representative of a mutual fund dealer, was fined \$1,673,772 and permanently prohibited from conducting securities related business for a range of misconduct related to his clients, including soliciting investments totalling \$1,533,772 in an outside business activity, failing to disclose conflicts of interests, and borrowing money from a client which he did not repay.

**Ann Marie Reid**, a representative of a mutual fund dealer was found, after a contested hearing, to have accepted a power of attorney for property and an appointment to act as executor and trustee of a client's estate among other things. She failed to disclose these conflicts of interest to the Dealer Member. The hearing panel found that "accepting a financial interest in a client's estate is totally inconsistent with the trusted position that a mutual fund advisor holds. It clearly and unambiguously prevents the Approved Person from being able to fulfil his or her role as an independent and impartial advisor influenced only by the best interests of the client." The hearing panel imposed a fine of \$125,000 and a permanent prohibition.

**Domino Au-Young**, a registered representative with an investment dealer, misappropriated \$30,000 CDN and \$45,000 USD from two clients using falsified letters of direction from the clients to instruct his firm to issue a third-party cheque, then had the funds transferred into his own accounts. The hearing panel accepted a settlement imposing a fine of \$125,000 and a permanent prohibition.

**Canaccord Genuity** was fined \$475,000 for failing to comply with its trading supervision obligations to maintain a system of risk management and supervisory controls, policies and procedures with respect to market access by two of its direct electronic access clients. As a result of supervisory failings by Canaccord, and Jitney Trade, which Canaccord became the sole owner of in 2018, over 10,000 trades which involved no change in the beneficial or economic ownership ("wash trades") were not prevented as intended and were executed without being detected.

## Promoting Market Integrity

Enforcement's efforts to strengthen market integrity focus on enforcing the Universal Market Integrity Rules (UMIR), the rules governing trading on CIRO-regulated marketplaces. We ensure that regulated persons perform their role as gatekeepers to the capital markets, monitoring and identifying improper, manipulative, or disorderly trading. Investments dealers and their Approved Persons occupy a privileged role in the securities regulatory framework and act as intermediaries, providing access to the markets. The gatekeeper role is a fundamental obligation to protecting market integrity and the reputation of the capital markets.

# Selected Case Highlights

## Improving Industry Standards

In every investigation, Enforcement assesses whether a Dealer Member has fulfilled its supervision obligations and met its supervision requirements. When advancing proceedings against firms, Enforcement's focus is not merely on sending a deterrence message to prevent a repetition of the failure by that firm, but on ensuring

that the firm has implemented adequate remedial measures to prevent against reoccurrence. Remedial measures that are tailored to the specific compliance and supervision failings are an important element in improving overall business standards and practices.

**Red Cloud** was fined \$100,000 and ordered to disgorge \$611,306.18 for permitting its employees to engage in private placements that involved purchases by retail clients without being registered or approved to deal with retail clients as required by regulation. In addition, the firm failed to maintain adequate books and records. It also failed to establish and maintain a system of controls and supervision that was adequate to ensuring that clients were qualified to purchase securities offered pursuant to prospectus exempt distributions.

**TD Investment Services** paid a fine of \$300,000 for failing to implement adequate policies and procedures relating to complaint handling and to ensure it complied with its obligations to make mandatory reports to CIRO and to conduct adequate or timely supervisory investigations. The firm implemented remedial measures and paid compensation to clients in relation to the supervisory failures.

**BMO Nesbitt Burns** was fined \$1,500,000 and ordered to disgorge \$146,876 for failing to implement a system of supervision and control in respect of the trading strategy of its registered representative, Yujie Liu. Liu engaged in a trading strategy that involved clients investing in preferred shares. The trading strategy evolved to a strategy of clients borrowing to invest in preferred shares. Instead of using conventional margin, this strategy involved short selling Government of Canada bonds. The trading strategy was high-risk. BMO failed to detect, in a timely manner, suitability issues associated with the strategy in the client accounts and to reasonably ensure that Liu and certain supervisors were adequately discharging their responsibilities under its policies and procedures with respect to suitability of their client accounts. In accepting the settlement, the hearing panel found the fine to be significant and "provide a large measure of general and specific deterrence to [BMO and Liu] and the industry as a whole." BMO also implemented remedial measures to prevent a reoccurrence of the failures.





# Statistics

## Sanctions Imposed

### Investment Dealers

Firms	FY24	FY23	FY22
Decisions	9	11	8
Fines	\$4,452,500	\$924,000	\$1,370,500
Costs	\$240,000	\$117,500	\$170,000
Disgorgement	\$797,017	\$0	\$0
<b>Total</b>	<b>\$5,489,517</b>	<b>\$1,041,500</b>	<b>\$1,540,500</b>
Permanent Suspension	1	0	1
Termination	0	4	1

Individuals	FY24	FY23	FY22
Decisions	22	20	23
Fines	\$3,395,461	\$9,175,224	\$2,119,770
Costs	\$246,408	\$518,000	\$499,022
Disgorgement	\$427,997	\$4,992,246	\$211,736
<b>Total</b>	<b>\$4,069,866</b>	<b>\$14,685,470</b>	<b>\$2,830,529</b>
Suspension	10	11	12
Permanent bar	2	3	4
Conditions	13	11	9

### Mutual Fund Dealers

Firms	FY24	FY23	FY22
Decisions	1	6	3
Fines	\$300,000	\$1,240,000	\$890,000
Costs	\$25,000	\$122,500	\$50,000
<b>Total</b>	<b>\$325,000</b>	<b>\$1,362,500</b>	<b>\$940,000</b>
Individuals	FY24	FY23	FY22
Decisions	43	71	75
Fines	\$4,220,881	\$5,553,210	\$2,934,997
Costs	\$299,500	\$452,163	\$365,550
<b>Total</b>	<b>\$4,520,381</b>	<b>\$6,005,373</b>	<b>\$3,300,547</b>
Suspension	14	18	27
Permanent bar	12	13	15

## Fine Collection Rate

### All of CIRO

	FY24	FY23	FY22
Individuals	15%	10%	38%
Firms	94%*	100%	100%

## Investment Dealers

### Complaints

#### Sources of Complaints

Source	FY24	FY23	FY22
Public	142	155	114
ComSet	1154	1306	885
Internal (from other CIRO departments)	39	38	26
Other SROs and Commissions	67	50	20
Other (Media, Dealer Members, and Whistleblowers)	19	14	8
<b>Total</b>	<b>1421</b>	<b>1563</b>	<b>1053</b>

#### Top Complaints Reviewed by Case Assessment

Allegation	FY24	FY23	FY22
Unsuitable Investments	22%	26%	20%
Unauthorized and Discretionary Trading	14%	19%	27%
Misrepresentation	1%	14%	12%
Supervision	21%	18%	9%

\* The fine collection rate is not 100% as some fines are being paid in installments. The fine collection rate for firms will return to 100% when the final installments are completed.

The percentage rates represent the monetary sanctions collected to date for that fiscal year. The rate does not include monetary sanctions imposed for cases that are under appeal. The rate for a given year may increase over time as CIRO continues to collect monetary sanctions after the year in which the sanctions were imposed.

CIRO typically collects 100% of the amounts imposed on firms. There are circumstances where firms may not pay, such as insolvency issues or where a suspension is imposed. Firms that do not pay are no longer members of CIRO in good standing.

## Investigations

### Investigations Completed

Source	FY24	FY23	FY22
Number of Investigations Completed	71	91	76
Percentage of Files Referred to Prosecutions	37%	41%	41%

### Investigations Completed by Province

Province	FY24	FY23
Alberta	5	13
British Columbia	15	15
Manitoba	0	0
New Brunswick	0	0
Newfoundland & Labrador	0	0
Nova Scotia	0	0
Ontario	37	49
Quebec	13	10
Saskatchewan	1	4
<b>Total</b>	<b>71</b>	<b>91</b>

### Investigations Completed by Source (% breakdown)

Source	FY24	# out of 71
ComSet	16	22.53%
Enforcement	9	12.68%
Public	2	2.82%
CIRO Compliance Depts	2	2.82%
Registration	3	4.23%
Trade Review and Analysis	7	9.86%
Securities Commissions	4	5.63%
Surveillance (Debt & Equity, Gatekeeper)	18	25.35%
<b>Other</b>	<b>10</b>	<b>14.08%</b>

## Enforcement Proceedings

### Commenced by Type

Source	FY24	FY23	FY22
Notice of Hearing (Disciplinary Hearing)	9	5	10
Settlement Hearing	21	13	14
Protective Order or Temporary Order	1	5	2
<b>Total</b>	<b>31</b>	<b>23</b>	<b>26</b>

### Concluded Proceedings by Province

A proceeding is concluded when a CIRO hearing panel, securities commission or court has made a final decision that includes the imposition of sanctions. Decisions under review by a securities commission or court are not included.

Source	FY24	FY23	FY22
Alberta	6	4	3
British Columbia	8	6	8
Manitoba	0	0	0
Ontario	11	14	14
New Brunswick	0	1	0
Newfoundland	0	1	1
Nova Scotia	1	1	0
Prince Edward Island	0	0	0
Quebec	3	2	4
Saskatchewan	2	2	1
<b>Total</b>	<b>31</b>	<b>31</b>	<b>31</b>

### Concluded Proceedings by Hearing Type

	FY24	FY23	FY22
Settlement	25	17	22
Disciplinary (including Protective or Temporary order)	6	14	9
<b>Total</b>	<b>31</b>	<b>31</b>	<b>31</b>

### Completed Proceedings by Regulatory Violation

Source	FY24	FY23	FY22
Complaint Handling	0	0	1
Discretionary Trading	1	3	4
Fail to Cooperate	1	2	5
Forgery	0	0	2
Fraud	1	1	0
Gatekeeper	3	2	1
Inappropriate Personal Financial Dealings	3	3	5
Inadequate Books and Records	0	0	0
Misappropriation	1	3	1
Misrepresentation	1	1	1
Manipulative & Deceptive Trading	0	0	1
Off-book Transactions	1	2	2
Outside Business Activities	2	3	4
Suitability/Due Diligence/Handling of Client Accounts	9	4	10
Supervision	1	0	0
Trading Conflict of Interest	0	0	1
Trading without Appropriate Registration	0	0	0
Unauthorized Trading	1	3	0
Undisclosed Conflict of Interest	0	0	2
Other	6	5	2

Firms	FY24	FY23	FY22
Capital Deficiency	2	0	1
Failure to Handle Client Accounts	0	0	1
Inadequate Books and Records	2	0	1
Internal Controls	3	4	4
Protective Order/Termination	1	4	1
Supervision	6	3	5
Other	4	1	0

# Mutual Fund Dealers

## Complaints

### Sources of Complaints

Source	FY24	FY23	FY22
Public	87	150	99
ComSet	1896	2382	1497
Internal (from other CIRO departments)	0	2	3
Other SROs and Commissions	2	3	5
Other (Media, Dealer Members, and Whistleblowers)	2	4	31
<b>Total</b>	<b>1987</b>	<b>2541</b>	<b>1635</b>

### Top Complaints Reviewed by Case Assessment

Allegation	FY24	FY23	FY22
Unsuitable Investments	26%	31%	15%
Unauthorized Discretionary Trading	11%	16%	21%
Misrepresentation	7%	8%	7%
Supervision	6%	8%	6%

## Investigations

### Investigations Completed

	FY24	FY23	FY22
Number of Investigations Completed	79	96	133
Percentage of Files Referred to Prosecutions	38%	46%	53%

### Investigations Completed by Province

Province	FY24
Alberta	5
British Columbia	19
Manitoba	1
New Brunswick	0
Newfoundland & Labrador	1
Nova Scotia	5
Ontario	44
Quebec	0
Saskatchewan	4
Yukon	0
<b>Total</b>	<b>79</b>

### Investigations Completed by Source (% breakdown)

Source	FY24	# out of 79
METS	65%	51
Public	9%	7
CIRO Compliance Depts	0%	0
Securities Commissions	2%	2
Other	24%	19

## Enforcement Proceedings

### Commenced by Type

	FY24	FY23	FY22
Notice of Hearing (Disciplinary Hearing)	19	31	47
Settlement Hearing	10	37	40
<b>Total</b>	<b>29</b>	<b>68</b>	<b>87</b>

### Concluded Proceedings by Province

A proceeding is concluded when a CIRO hearing panel, securities commission or court has made a final decision that includes the imposition of sanctions. Decisions under review by a securities commission or court are not included.

Source	FY24	FY23	FY22
Alberta	6	2	9
British Columbia	6	14	15
Manitoba	2	9	5
Ontario	24	47	40
New Brunswick	1	1	2
Newfoundland	0	0	1
Nova Scotia	3	1	4
Prince Edward Island	0	0	0
Quebec	0	0	0
Saskatchewan	2	3	2
<b>Total</b>	<b>44</b>	<b>77</b>	<b>78</b>

### Concluded Proceedings by Hearing Type

	FY24	FY23	FY22
Settlement	22	42	49
Disciplinary (including Protective or Temporary order)	22	35	29
<b>Total</b>	<b>44</b>	<b>77</b>	<b>78</b>

### Concluded Proceedings by Regulatory Violation\*

Source	FY24	FY23	FY22
Business Standards	0	6	0
Falsification / Misrepresentation	3	1	1
Failure to Cooperate	1	4	4
Conflict of Interest	3	4	2
Active Signature Falsification	7	11	12
Active Outside Registration Status	5	2	2
Pre-Signed Forms	9	18	25
Personal Financial Dealings	4	6	7
Suitability - Leveraging	0	2	0
Forgery / Fraud / Theft / Misappropriation / Misapplication	3	6	5
Unauthorized / Discretionary Trading	2	3	4
Stealth Advising	0	1	4
KYC Documentation Deficiency	0	1	1
Supervision	1	3	2
Confidentiality / Privacy	2	1	1
Referral Arrangements	1	1	0
Know Your Product	0	1	0
Outside Activity	0	0	2
Suitability - Investments	2	0	3
Handling of Funds	0	0	0
Policies and Procedures	0	0	0
Conduct Unbecoming	0	0	0
Firms	FY24	FY23	FY22
Supervision	1	4	0
Financial Requirements	0	0	1
Complaint Procedure	0	0	0
Conflict of Interest	0	0	2
Know your Product	0	1	0
Confidentiality/Privacy	0	1	0

\*These numbers represent concluded proceedings by primary violation.

# Proceedings

## Investment Dealers

### Individuals

April 1, 2023 to March 31, 2024

Case Name (Province)	Type of Proceeding	Commenced	Contraventions	Sanctions Imposed
<u><a href="#">Eley, Douglas John</a></u> Ontario	Appeal	November 29, 2018	Standards of Conduct	Fine \$50,000 Costs \$60,000 Suspension: 12 months Conditions
<u><a href="#">Metcalfe, Donald Warren</a></u> British Columbia	Discipline	November 2, 2020	Outside Business Activity; Failure to Cooperate	Fine \$2,500,000 Costs \$68,908 Permanent Bar
<u><a href="#">Barber, Robert</a></u> British Columbia	Discipline	August 11, 2022	Standards of Conduct	Fine \$25,000 Disgorgement \$27,776 Costs \$5,000
<u><a href="#">Spooner, Dominic</a></u> British Columbia	Discipline	Oct 31, 2022	Standards of Conduct; Accepting Remuneration for Person Other Than Dealer Member	Fine \$20,000 Disgorgement \$35,500 Costs \$15,000 Suspension: 24 months Conditions
<u><a href="#">Green, Catherine Elizabeth</a></u> Alberta	Discipline	November 25, 2022	Suitability	Fine \$30,000 Disgorgement \$14,954 Costs \$5,000 Conditions
<u><a href="#">Poulin, Patrick</a></u> Quebec	Discipline	January 23, 2023	Standards of Conduct	Fine \$32,000 Costs \$10,000 Suspension: 12 months Conditions
<u><a href="#">Harwood, Lee Fraser</a></u> Nova Scotia	Settlement	March 28, 2023	Standards of Conduct	Fine \$40,000 Costs \$5,000 Conditions

## Individuals (Cont)

Case Name (Province)	Type of Proceeding	Commenced	Contraventions	Sanctions Imposed
<a href="#"><u>Danielak, Martin</u></a> Alberta	Settlement	April 18, 2023	Standards of Conduct; Manipulative and Deception Activities	Fine \$21,000 Disgorgement \$105 Costs \$2,500 Suspension: 2 months Conditions
<a href="#"><u>Bishop, Craig Steven</u></a> Alberta	Settlement	May 1, 2023	Standards of Conduct	Fine \$15,000 Costs \$5,000
<a href="#"><u>Crocker, Robert Weston</u></a> Ontario	Settlement	May 5, 2023	Failure to Know Client; Standards of Conduct	Fine \$30,000 Disgorgement \$8,078 Costs \$10,000 Suspension: 6 months Conditions
<a href="#"><u>Blaine, Patrick Arnold</u></a> Saskatchewan	Settlement	May 15, 2023	Failure to Supervise	Fine \$35,000 Costs \$5,000 Suspension Supervisory: 6 months Conditions
<a href="#"><u>Reyes, John Manuel</u></a> Alberta	Settlement	May 19, 2023	Suitability	Fine \$22,461 Disgorgement \$9,000 Costs \$5,000 Conditions
<a href="#"><u>Mauro, Francesco</u></a> Vancouver	Settlement	June 1, 2023	Suitability	Fine \$30,000 Costs \$5,000
<a href="#"><u>Au-Young, Domino</u></a> British Columbia	Settlement	June 6, 2023	Standards of Conduct; Outside Business Activity	Fine \$125,000 Costs \$7,500 Permanent Ban
<a href="#"><u>Hunter, Bart William</u></a> Saskatchewan	Settlement	July 6, 2023	Standards of Conduct	Fine \$70,000 Costs \$5,000 Suspension: 3 months Conditions

Case Name (Province)	Type of Proceeding	Commenced	Contraventions	Sanctions Imposed
<a href="#"><u>Dai, Zhiping (Davis)</u></a> Alberta	Settlement	July 31, 2023	Personal Financial Dealings	Fine \$21,000 Costs \$3,000
<a href="#"><u>Desprès, Louis</u></a> Quebec	Settlement	August 3, 2023	Suitability	Fine \$14,000 Disgorgement \$4,000 Costs \$2,000 Conditions
<a href="#"><u>Liu, Yujie (Jared)</u></a> Ontario	Settlement	August 15, 2023	Suitability	Fine \$80,000 Disgorgement \$63,258 Costs \$5,000 Conditions
<a href="#"><u>Creed, Blayne</u></a> Ontario	Settlement	September 26, 2023	Failure to Supervise	Fine \$40,000 Disgorgement \$38,834.40 Suspension: 12 months
<a href="#"><u>Bédard, Michel</u></a> Quebec	Settlement	December 5, 2023	Standards of Conduct; Suitability; Discretionary Trading; Failure to Disclose Fees	Fine \$150,000 Disgorgement \$226,492 Costs \$10,000 Suspension: 2 months
<a href="#"><u>Moore, Graham Darren</u></a> British Columbia	Settlement	January 26, 2024	Standards of Conduct	Reprimand Costs \$7,500
<a href="#"><u>Yang, Sam Hsiao-Tse</u></a> Alberta	Settlement	February 28, 2024	Conflicts of Interest	Fine \$45,000 Costs \$5,000 Suspension: 9 months Conditions

## Firms

April 1, 2023 to March 31, 2024

Case Name (Province)	Type of Proceeding	Commenced	Contraventions	Sanctions Imposed
<a href="#">Fortrade Canada Limited</a> Ontario	Settlement	November 4, 2022	Standards of Conduct; Failure to Supervise; Failure to Maintain Records	Fine \$2,000,000 Costs \$100,000 Conditions
<a href="#">Gravitas Securities Inc.</a> Ontario	Discipline	May 30, 2023	Capital Deficiency	Suspension
<a href="#">Red Cloud Securities Inc.</a> Ontario	Settlement	July 4, 2023	Acting Without Proper Approval; Books and Records; Internal Controls	Fine \$100,000 Disgorgement \$611,306.18 Costs \$15,000
<a href="#">BMO Nesbitt Burns Inc.</a> Ontario	Settlement	August 15, 2023	Failure to Supervise	Fine \$1,500,000 Costs \$50,000 Disgorgement \$146,876
<a href="#">Gravitas Securities Inc.</a> Ontario	Settlement	September 26, 2023	Capital Deficiency	Disgorgement \$38,834.40 Costs \$15,000

Case Name (Province)	Type of Proceeding	Commenced	Contraventions	Sanctions Imposed
<a href="#">Pollitt &amp; Co. Inc.</a> Ontario	Settlement	October 12, 2023	Capital Deficiency; Internal Controls; Books and Records; Failure to Report Debt Transactions; Failure to Comply with Early Warning Restrictions	Fine \$175,000 Costs \$15,000
<a href="#">Canaccord Genuity Corp.</a> British Columbia	Settlement	November 7, 2023	Failure to Supervise	Fine \$475,000 Costs \$25,000 Conditions
<a href="#">Leede Jones Gable Inc.</a> British Columbia	Settlement	November 16, 2023	Failure to Supervise	Fine \$150,000 Costs \$15,000
<a href="#">HSBC Securities (Canada) Inc.</a> Ontario	Settlement	December 4, 2023	Failure to Supervise	Fine \$52,500 Costs \$5,000



# Mutual Fund Dealers

## Individuals

April 1, 2023 to March 31, 2024

Case Name (Province)	Type of Proceeding	Commenced	Contraventions	Sanctions Imposed
<u>Movassaghi, Mohammad</u> British Columbia	Discipline	March 21, 2019	Signature Falsification; Conflict of Interest; Falsification/ Misrepresentation; Outside Activity; Unauthorized/ Discretionary Trading	Fine \$70,000 Costs \$45,000 Permanent Prohibition
<u>Rivet, Nicholas</u> Ontario	Discipline	November 16, 2021	Forgery/Fraud/Theft/ Misappropriation/ Misapplication; Falsification/ Misrepresentation; Unauthorized/ Discretionary Trading	Costs \$7,500 Permanent Prohibition
<u>Thomas, Hope</u> British Columbia	Discipline	November 22, 2021	Forgery/Fraud/Theft/ Misappropriation/ Misapplication	Fine \$300,000 Costs \$10,000 Permanent Prohibition
<u>Kelly, Simon</u> Alberta	Discipline	December 17, 2021	Conflict of Interest; Policy & Procedures	Fine \$70,000 Costs \$10,000 6 month Suspension
<u>Polischuk, Brent</u> British Columbia	Discipline	April 7, 2022	Personal Financial Dealings; Conflict of Interest; Falsification/ Misrepresentation; Failure to Cooperate	Fine \$137,713.41 Costs \$10,000 Permanent Prohibition
<u>Sonne, Patricia</u> Ontario	Discipline	May 3, 2022	Pre-Signed Forms	Fine \$2,500 Costs \$5,000 2 year Suspension

Case Name (Province)	Type of Proceeding	Commenced	Contraventions	Sanctions Imposed
<u>Dziadecki, Leszek</u> Ontario	Discipline	August 3, 2022	Acting Outside Registration Status; Outside Activity	Fine \$300,000 Costs \$30,000 Permanent Prohibition
<u>Reid, Ann Marie</u> Ontario	Discipline	August 22, 2022	Personal Financial Dealings; Conflict of Interest; Pre-Signed Forms; Falsification/ Misrepresentation	Fine \$125,000 Costs \$20,000 Permanent Prohibition
<u>Hogg, Charles Leigh</u> Ontario	Settlement	September 6, 2022	Confidentiality/ Privacy; Business Standards	Fine \$27,500 Costs \$5,000 Educational Course Requirement 9 month Suspension
<u>Talosi, Stephen</u> Ontario	Settlement	September 6, 2022	Confidentiality/ Privacy; Business Standards; Falsification/ Misrepresentation	Fine \$40,000 Costs \$5,000 Educational Course Requirement 12 month Suspension
<u>Moody, John</u> Alberta	Discipline	September 9, 2022	Pre-Signed Forms	Fine \$18,500 Costs \$3,000
<u>Khaldi, Adib</u> Nova Scotia	Discipline	October 5, 2022	Conflict of Interest; Acting Outside Registration Status; Outside Activity; Policy & Procedures	Fine \$15,000 Costs \$10,000 Educational Course Requirement 2 year Suspension
<u>Yamamoto, George</u> Ontario	Settlement	October 7, 2022	Personal Financial Dealings; Business Standards; Confidentiality/ Privacy; Conflict of Interest; Policy & Procedures	Fine \$100,000 Costs \$5,000 Permanent Prohibition

## Individuals (Cont)

Case Name (Province)	Type of Proceeding	Commenced	Contraventions	Sanctions Imposed
<u><a href="#">Bock, Michael</a></u> Alberta	Discipline	November 18, 2022	Pre-Signed Forms	Fine \$28,000 Costs \$3,000 Educational Course Requirement
<u><a href="#">Walker, Paul</a></u> Ontario	Discipline	November 23, 2022	Acting Outside Registration Status; Outside Activity; Personal Financial Dealings	Fine \$1,673,772 Costs \$15,000 Permanent Prohibition
<u><a href="#">Park, Seongho (Steve)</a></u> British Columbia	Settlement	November 24, 2022	Suitability – Investments; Policy & Procedures	Fine \$10,000 Costs \$5,000
<u><a href="#">Luciano, Antonio</a></u> Ontario	Discipline	December 6, 2022	Signature Falsification; Pre-Signed Forms	Fine \$25,000 Costs \$7,500 1 year Suspension
<u><a href="#">Song, Lifan</a></u> Manitoba	Settlement	December 28, 2022	Personal Financial Dealings; Complaint Procedure; Policy & Procedures	Fine \$20,000 Costs \$5,000 6 month Suspension
<u><a href="#">Tachauer, Andrew</a></u> Ontario	Settlement	December 19, 2022	Suitability – Investments; Policy & Procedures; KYC Documentation Deficiency	Fine \$40,000 Costs \$5,000
<u><a href="#">Gable, Donald</a></u> Alberta	Discipline	December 19, 2022	Referral Arrangements; Acting Outside Registration Status; Complaint Procedure	Fine \$36,000 Costs \$7,500 10 year Suspension

Case Name (Province)	Type of Proceeding	Commenced	Contraventions	Sanctions Imposed
<u><a href="#">Carter, Roxanne</a></u> Ontario	Settlement	December 22, 2022	Pre-Signed Forms	Fine \$10,000 Costs \$5,000
<u><a href="#">Fan, Wenjuan</a></u> Ontario	Discipline	December 28, 2022	Unauthorized/ Discretionary Trading; Falsification/ Misrepresentation; Active Signature Falsification	Fine \$25,000 Costs \$7,500 Permanent Prohibition
<u><a href="#">Beh, Jennifer</a></u> Ontario	Discipline	February 1, 2023	Failure to Cooperate	Fine \$50,000 Costs \$7,500 Permanent Prohibition
<u><a href="#">Patel, Ramanbhai</a></u> Ontario	Settlement	March 1, 2023	Pre-Signed Forms	Fine \$25,000 Costs \$2,500 Educational Course Requirement 30 day Suspension 2 year Supervisory Suspension
<u><a href="#">Ristovski, Dejan</a></u> Alberta	Discipline	March 3, 2023	Forgery/Fraud/Theft/ Misappropriation/ Misapplication; Failure to Cooperate; Personal Financial Dealings	Fine \$100,000 Costs \$11,000 Permanent Prohibition
<u><a href="#">Rana, Baljit</a></u> British Columbia	Settlement	March 20, 2023	Signature Falsification; Pre-Signed Forms	Fine \$18,000 Costs \$2,500
<u><a href="#">Lukiwski, George</a></u> Saskatchewan	Discipline	March 22, 2023	Pre-Signed Forms	Fine \$22,500 Costs \$5,000

## Individuals (Cont)

Case Name (Province)	Type of Proceeding	Commenced	Contraventions	Sanctions Imposed
<a href="#"><u>Farmer, Autumn</u></a> Nova Scotia	Settlement	March 27, 2023	Signature Falsification; Falsification/ Misrepresentation	Fine \$5,000 Costs \$5,000
<a href="#"><u>Vaarsi, Stephanie</u></a> Ontario	Settlement	May 31, 2023	Pre-Signed Forms	Fine \$22,500 Costs \$2,500
<a href="#"><u>Cauvier, Samantha</u></a> Alberta	Settlement	June 9, 2023	Falsification/ Misrepresentation; Policy & Procedures; Trading Outside Jurisdiction	Fine \$2,500 Costs \$5,000 2 month Suspension
<a href="#"><u>Sukhai, Omadai (Amy)</u></a> Ontario	Discipline	June 15, 2023	Personal Financial Dealings; Policy & Procedures	Fine \$213,509 Costs \$10,000 Permanent Prohibition
<a href="#"><u>Hall, Martin</u></a> New Brunswick	Discipline	June 20, 2023	Pre-Signed Forms	Fine \$17,500 Costs \$2,500
<a href="#"><u>Chau, Antony</u></a> Ontario	Discipline	July 17, 2023	Falsification/ Misrepresentation	Fine \$65,000 Costs \$6,000 Permanent Prohibition
<a href="#"><u>Khamisa, Aziz</u></a> Ontario	Settlement	July 17, 2023	Falsification/ Misrepresentation	Fine \$40,000 Costs \$5,000 1 year Suspension 5 year Supervisory Suspension
<a href="#"><u>Che, Miranda</u></a> Saskatchewan	Settlement	August 3, 2023	Signature Falsification	Fine \$14,000 Costs \$5,000 3 month Suspension
<a href="#"><u>Mott, Jila Mahnaz</u></a> Ontario	Discipline	August 4, 2023	Personal Financial Dealings; Policy & Procedures	Fine \$776,100 Costs \$7,500 Permanent Prohibition

Case Name (Province)	Type of Proceeding	Commenced	Contraventions	Sanctions Imposed
<a href="#"><u>Mollons, Shawn</u></a> Manitoba	Settlement	August 8, 2023	Signature Falsification	Fine \$13,000 Costs \$2,500 2 month Suspension
<a href="#"><u>Bobb, Mei-Hui</u></a> British Columbia	Settlement	August 11, 2023	Signature Falsification; Pre-Signed Forms	Fine \$28,000 Costs \$5,000 2 month Suspension
<a href="#"><u>Friesen, Robert</u></a> Nova Scotia	Settlement	September 11, 2023	Failure to Supervise	Fine \$5,000 Costs \$2,500 Educational Course Requirement 6 month Supervisory Suspension
<a href="#"><u>Jindal, Vikram</u></a> Ontario	Settlement	October 5, 2023	Trading Outside Jurisdiction; Policy & Procedures	Fine \$5,000 Costs \$2,500
<a href="#"><u>Fawcett, Erika</u></a> Ontario	Settlement	October 5, 2023	Signature Falsification; Trading Outside Jurisdiction; Policy & Procedures; Pre-Signed Forms	Fine \$10,000 Costs \$1,500
<a href="#"><u>Shogilev, Norman</u></a> Ontario	Settlement	November 29, 2023	Trading Outside Jurisdiction; Books/Records/Client Reporting; Unauthorized/ Discretionary Trading	Fine \$25,000 Costs \$5,000 Educational Course Requirement
<a href="#"><u>Hanson, Sherry</u></a> Ontario	Settlement	December 8, 2023	Pre-Signed Forms	Fine \$26,000 Costs \$2,500

## Firms

## April 1, 2023 to March 31, 2024

Case Name (Province)	Type of Proceeding	Commenced	Contraventions	Sanctions Imposed
<a href="#"><u>TD Investment Services Inc.</u></a> Ontario	Settlement	February 15, 2024	Reporting Violations; Complaint Procedure; Supervision	Fine \$125,000 Costs \$20,000 Permanent Prohibition

# Contact Us

**T:** 1-877-442-4322

**F:** 1-888-497-6172

**E:** [investorinquiries@ciro.ca](mailto:investorinquiries@ciro.ca)

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