BRITISH COLUMBIA SECURITIES COMMISSION
Securities Act, RSBC 1996, c. 418

Citation: Re The Falls Capital Corp., 2015 BCSECCOM 422 Date: 20151125

The Falls Capital Corp., Deercrest Construction Fund Inc., West Karma Ltd. and Rodney Jack Wharram

Panel	Nigel P. Cave	Vice Chair
	Judith Downes	Commissioner
	George C. Glover, Jr.	Commissioner
	Don Rowlatt	Commissioner
Hearing date	October 19, 2015	
Decision date	November 25, 2015	

Appearing

Olubode Fagbamiye	For the Executive Director
Rodney Jack Wharram	For the Respondents

Decision

I. Introduction

[1] This is the sanctions portion of a hearing under sections 161(1) and 162 of the *Securities Act*, RSBC 1996, c. 418. The Findings of this panel on liability made on February 11, 2015 (2015 BCSECCOM 59), are part of this decision.

[2] In the Findings, the panel found that:

(a) Wharram and Falls breached section 57(b) when they took $47,500 directly from a Falls' bank account and used it for Wharram's personal expenses;

(b) Wharram, West Karma and Falls breached section 57(b) when they took $75,000 from Falls, deposited it into a West Karma account and then used it for Wharram's personal expenses;

(c) Wharram, West Karma and Deercrest breached section 57(b) when they took $130,000 from Deercrest, deposited it into a West Karma account and then used it for Wharram's personal expenses;

(d) Wharram and Deercrest breached section 57(b) when they took $265,000 directly from Deercrest's bank accounts and used it for Wharram's personal expenses; and

(e) Wharram contravened section 168.1(1)(a) when he made false statements to Commission investigators.

[3] The respondents also brought an application to vary a freeze order originally made by the Commission on June 14, 2013 (2013 BCSECCOM 290). We heard this application in conjunction with the sanctions hearing.

[4] We received oral and written submissions from all parties on the application and sanctions.

[5] This is our decision on the application and sanctions.

II. Application to vary freeze order

A. Background

[6] 0966841 BC Ltd. is a company that was incorporated by Wharram. Money held in a bank account of 0966841 is subject to the freeze order.

[7] On July 31, 2013, Wharram applied to vary the freeze order in several respects, one of which was to allow 0966841 to pay certain construction invoices in connection with the development of the Deercrest project.

[8] On August 6, 2013, the Commission dismissed this aspect of Wharram's application to vary the freeze order, on the basis that to do so would be contrary to the public interest.

[9] The respondents submit that in late 2013 Wharram negotiated a commercial transaction with certain third parties, including the developers of the Deercrest project, whereby Wharram would transfer control of 0966841 to the third parties. As part of that transfer, the following share ownership structure of 0966841 was to be implemented: the third parties - a combined 65% ownership interest; a specific individual, Mr. N., who had loaned money to Wharram – a 10% ownership interest; and Wharram's "investors" (presumably all of the investors in Deercrest and The Falls) - a 25% ownership interest (collectively, the Share Transaction).

[10] The respondents say that the third parties have agreed to complete the Share Transaction, provided that 0966841's funds are released from the freeze order. The respondents say that the intent of 0966841 would be to spend the released funds on expenditures relating to development of the Deercrest project.

B. Positions of the parties

[11] The respondents say that we may revoke or amend the freeze order under section 171 of the Act. The test under that section is whether to do so would not be prejudicial to the public interest.

[12] The respondents submit that releasing the funds from the freeze order would not be prejudicial to the public interest for the following reasons:

- the respondents have no financial interest in the Share Transaction and will receive no benefit if it is implemented;
- the funds that are in 0966841's bank account came, via West Karma, from Mr. N., who would receive a 10% ownership interest in 0966841;
- the funds in 0966841's account do not come from the offerings made by The Falls and Deercrest;
- Wharram has contacted a number of his former investors and a majority of those investors are in favour of the Share Transaction;
- the Share Transaction would provide an opportunity for the former investors in Deercrest and The Falls to participate in the further development of the Deercrest project (although, we note that there was no evidence as to what interest 0966841, or any other third party, has in the Deercrest development); and
- the funds in the 0966841 bank account would only provide a *de minimis* return to investors if they are eventually dispersed to The Falls and Deercrest investors under the Act.

[13] The executive director acknowledges that we have the authority to vary the freeze order under section 171 of the Act. He submits that varying the freeze order would be prejudicial to the public interest for the following reasons:

- the funds in 0966841's bank account came from West Karma's bank account and are investor funds, regardless of the timing of specific deposits into West Karma's account prior to its transfer of the funds to 0966841;
- Wharram only contacted a small minority of investors in The Falls and Deercrest and we should not take his sample as determinative of investor preference;
- in order to succeed under section 171, the onus is on the respondents to show that there has been a change in circumstances or new evidence that warrants a revocation or amendment of the freeze order and, in this case, there is no new evidence or change in circumstances;
- there is no provision in the Act that would allow the panel to direct the allocation of the frozen funds;
- the frozen funds may be subject to a claim by the Commission if financial sanctions are awarded by the panel against one or more of the respondents and should not be allowed to be dissipated by 0966841; and
- it would be premature to vary the freeze order to release the funds prior to any decision on financial sanctions by this panel.

C. Analysis

[14] We did not find that the submissions of the parties really focused on the relevant issues. We did not have any submissions from 0966841 which is the entity whose funds are frozen and is most directly affected by the application.

[15] Notwithstanding these problems, this application is fairly straightforward. The funds in the account of 0966841 are, in fact, legally its own funds, regardless of the submissions of the parties that we should trace the funds back to Mr. N. or to investors generally.

[16] The purpose of a freeze order is to freeze assets until such time as a court can make a determination of who is entitled to the assets that are subject to the freeze order. In this case, we have no idea who, ultimately, will be entitled to those funds and on what basis. What is clear is that if we vary the freeze order, the practical effect of the variance will be that the funds will be available to be spent by 0966841 and will cease to be available for distribution under the scheme of the Act or any other statutory procedure such as through bankruptcy. We are not in a position to determine if that is appropriate or not.

[17] Therefore, the respondents have not established that releasing the funds of 0966841 subject to the freeze order, would not be prejudicial to the public interest. We dismiss the respondents' application.

III. Sanctions

A. Position of the parties

[18] The executive director seeks the following orders against the respondents:

a) permanent prohibitions from all market activity under section 161(1) of the Act;

b) a disgorgement order in the amount of $517,500 under section 161(1)(g) of the Act; and

c) an administrative penalty of $1.6 million under section 162 of the Act.

[19] The executive director says that each of the respondents should be jointly and severally liable for each of the financial sanctions.

[20] Each of the respondents was found to have committed different frauds, in differing combinations, and Wharram was found to have committed an additional contravention of the Act by lying to Commission investigators. The executive director's submissions do not differentiate among the different respondents on the differing frauds nor do his submissions contain a separate request for a separate sanction for Wharram having lied to Commission investigators. We presume that the executive director's submission is that the entirety of the misconduct warrants the sanctions requested.

[21] The respondents say that the following are appropriate orders in the circumstances:

a) prohibitions imposed on Wharram from all market activity under section 161(1) of the Act for a period of five years, which five year period should run from June 14, 2013, being the date of the Temporary Order;

b) an order against Wharram under section 161(1)(g) in the amount of $110,000, including an order that a portion of this amount would be paid from the funds in the accounts of Wharram, Deercrest, West Karma and 0966841 and which are subject to freeze orders; and

c) no administrative fines under section 162; however, if an administrative fine is to be awarded, then an order against Wharram in the amount that he could actually afford to pay being $22,500.

[22] The respondents say that each of the corporate respondents is dormant and that no orders against these entities are necessary in the circumstances. However, if we are to make orders against the corporate respondents then they should be made jointly and severally liable for the financial sanctions imposed against Wharram.

[23] Finally, Wharram says that he would like to attempt to repay investors and that we should make an order allowing him to do so in a manner that does not require disbursement of funds under section 15.1 of the Act.

B. Factors

[24] Orders under sections 161(1) and 162 of the Act are protective and preventative, intended to be exercised to prevent future harm. See *Committee for Equal Treatment of Asbestos Minority Shareholders v. Ontario (Securities Commission)* 2001 SCC 37.

[25] In *Re Eron Mortgage Corporation* [2000] 7 BCSC Weekly Summary 22, the Commission identified factors relevant to sanction as follows (at page 24):

> In making orders under sections 161 and 162 of the Act, the Commission must consider what is in the public interest in the context of its mandate to regulate trading in securities. The circumstances of each case are different, so it is not possible to produce an exhaustive list of all of the factors that the Commission considers in making orders under sections 161 and 162, but the following are usually relevant:
>
> - the seriousness of respondent's conduct,
> - the harm suffered by investors as a result of the respondent's conduct,
> - the damage done to the integrity of the capital markets in British Columbia by the respondent's conduct,
> - the extent to which the respondent was enriched,
> - factors that mitigate the respondent's conduct,
> - the respondent's past conduct,

- the risk to investors and the capital markets posed by the respondent's continued participation in the capital markets of British Columbia,
- the respondent's fitness to be a registrant or to bear the responsibilities associated with being a director, officer or adviser to issuers,
- the need to demonstrate the consequences of inappropriate conduct to those who enjoy the benefits of access to the capital markets,
- the need to deter those who participate in the capital markets from engaging in inappropriate conduct, and
- orders made by the Commission in similar circumstances in the past.

C. Application of the Factors

Seriousness of the conduct

[26] This Commission has repeatedly found that fraud is the most serious misconduct under the Act. As noted in *Manna Trading Corp Ltd. (Re)*, 2009 BCSECCOM 595, "nothing strikes more viciously at the integrity of our capital markets than fraud".

[27] The respondents' conduct is an egregious form of fraud. In this case, Wharram raised money from investors on the basis of their intent to invest in the corporate respondents which, in turn, would engage in real estate development projects and then he simply spent a portion of the money on his personal expenses.

[28] Wharram then continued his deceit by lying under oath to Commission staff about his activities. This is serious misconduct in and of itself. As noted in *Edward Bernard Johnson*, 2007 BCSECCOM 437, "section 168.1 is important in preserving the integrity of the regulatory system by requiring those required to provide information to the commission to do so truthfully".

[29] The respondents have attempted to minimize the seriousness of their misconduct by highlighting that the panel did not find the respondents liable for another alleged fraud totaling $5.3 million. They say that only a small portion, from a dollar amount perspective, of the originally alleged fraud has been proven.

[30] We do not agree with this submission. While the quantum of enrichment associated with fraud may have an impact on the financial sanctions imposed against a respondent, fraud is still the most serious misconduct contemplated by the Act, regardless of quantum.

Harm to investors

[31] Investors in The Falls and Deercrest originally invested approximately $9.3 million in those entities. Some investors received some interest payments on their original investments. Otherwise, investors have likely lost all or substantially all of their investments in The Falls and Deercrest.

[32] The amounts invested by each investor varied in size but many of them were significant. We heard direct testimony from a number of investors which suggested that the financial impact of their losses was catastrophic.

[33] The executive director submitted a number of victim impact statements which also outlined the significant financial losses suffered by investors in this case. The respondents submit that we should disregard the victim impact statements as they are biased. They say this because the impact statement forms contain questions asking about the impact of the respondents' securities violations, which questions were asked prior to the Findings being issued and did not, at the time of circulation, contain any language that made it clear that at that time the violations referred to were "alleged" securities violations. Further, the respondents say that the impact statements are particularly biased in this case as they were submitted prior to the panel's dismissal of the second, and larger, allegation of fraud in the Findings. The fact that the executive director failed to prove the larger fraud does not diminish the losses suffered by the investors.

[34] We are concerned about some of the content of the victim impact statement forms and the timing of seeking victim impact statements before any allegations have been proven. The impact statement questionnaires do not contain cautionary language advising the investor that the allegations referred to in them are unproven at the time of request.

[35] Notwithstanding this, the magnitude of investor losses in this case is significant. The testimony of the investor witnesses established that their losses have significantly impacted retirement and other financial plans. There is no doubt that there has been significant harm to investors and our capital markets as a consequence.

Enrichment

[36] In our Findings we determined that Wharram, through the corporate respondents, misappropriated $517,500 and used it for his personal expenses. Wharram has been personally enriched by that amount.

[37] The respondents admit that $110,000 of the amounts taken for personal expenses was not repaid. The respondents submit that the rest of the $517,500 was repaid. They point to various bank account statements in support of this proposition.

[38] However, as we noted in our Findings, we were not provided with evidence in support of these bank statements to determine if various deposits were, in fact, repayments by Wharram of any particular amount that he had taken for his personal purposes. The evidence was clear that investor funds were co-mingled among the Deercrest, The Falls and West Karma accounts, which leads to even less clarity on what deposits related to what. In addition, a number of the alleged repayments supposedly made by Wharram were made to a West Karma account with no evidence to suggest that these funds ever found their way back to The Falls or Deercrest. The respondents did not establish to what extent, if at all, misappropriated funds were repaid.

Aggravating or mitigating factors

[39] None of the respondents has any history of securities regulatory misconduct.

[40] The executive director says that it is an aggravating factor that Wharram lied to Commission investigators. We do not see this as an aggravating factor. This was a separate contravention of the Act, which could warrant its own sanctions. In this case, the lie that Wharram told to investigators was not related to the fraud; the lie related to whether Wharram was still trying to raise money at the time of the interview.

[41] The respondents submit that there are mitigating factors in that they cooperated with the Commission investigation at all times. They also submit that they were ignorant of the law relating to fraud and that their misconduct was not intentional in that Wharram intended to repay all of the funds taken from The Falls and Deercrest.

[42] A failure to cooperate with a Commission investigation may be an aggravating factor. However, answering questions and supplying documents that a respondent is legally required to answer or supply is not a mitigating factor - it is expected of market participants. The absence of an aggravating factor is not the same as a mitigating factor.

[43] The respondents' submission of ignorance of the law of fraud is neither persuasive nor a mitigating factor. Fraud requires there to be the requisite *mens rea* – which includes subjective knowledge of the deceit. The respondents were aware that they were deceiving investors. Further, ignorance of the law is not a mitigating factor.

[44] There are no mitigating or aggravating factors in this case.

Fitness to continue to participate in the capital markets

[45] Wharram has been found to have committed fraud which, by definition, involves an element of deceit. His deceitfulness continued in his interview with Commission staff. Given this history of deceit in dealing with investors and the securities regulatory authority, we consider Wharram to represent a significant future risk to our capital markets.

Specific and general deterrence

[46] The sanctions we impose must be sufficient to ensure that the respondents and others will be deterred from engaging in similar misconduct.

[47] The respondents submit that the financial circumstances of Wharram must be taken into account in determining our financial sanctions. They submit that the Alberta Court of Appeal decision in *Walton v. Alberta (Securities Commission)*, 2014 ABCA 273 requires this consideration. Wharram submitted evidence that he has limited ability to pay any financial sanctions and that a large financial sanction will therefore not act as a specific deterrent.

[48] The executive director submitted that a number of decisions of this Commission support the position that a respondent's inability to pay a financial sanction is not relevant to deterrence, including *Samji (Re)*, 2015 BCSECCOM 29 and *Anderson (Re)*, 2007 BCSECCOM 350.

[49] We agree that a respondent's inability to pay a financial sanction is not relevant to the question of whether it is appropriate to make an order under section 161(1)(g). We also agree that a respondent's inability to pay an order under section 162 should not be determinative of whether such an award should be made. It should be but one of the considerations in determining what orders are appropriate for specific deterrence in the circumstances. A respondent's ability to pay is not relevant to issues of general deterrence.

Previous Orders

[50] The executive director cited previous decisions of this Commission in support of two propositions (rather than citing the decisions for any similarity to the factual circumstances of this case):

- that permanent market bans are almost universally ordered in cases of fraud; and
- that an administrative fine of two to three times the amount of the respondent's enrichment is appropriate in cases of fraud.

[51] In support of the first proposition, the executive director cites *Kim (Re)*, 2010 BCSECCOM 684, *Canada Pacific Consulting Inc. (Re)*, 2012 BCSECCOM 195, *Basi (Re)*, 2011 BCSECCOM 573, *Great White Capital Corp. (Re)*, 2011 BCSECCOM 303, and *IAC Independent Academies (Re)*, 2014 BCSECCOM 260. In support of the second proposition, the executive director cites the *Canada Pacific*, *Basi* and *Great White* decisions.

[52] The respondents submit that these decisions differ in their factual circumstances from those in the case before us. The respondents submit that we should treat the case before us as unique and not compare it to previous cases before the Commission.

[53] Further, the respondents submit that the application of a formulaic multiple of the quantum of enrichment as the mechanism for determining the amount of the administrative fine is inconsistent with a unique assessment of each respondent's misconduct and each respondent's individual circumstances.

[54] We agree with the respondents that a formulaic approach to the determination of an administrative penalty is inconsistent with the principles of specific deterrence which should take into account all relevant factors including the respondents' individual circumstances and result in a sanction that is appropriate to the misconduct.

[55] The respondents further submit that the application of a two or three times multiple to the quantum of enrichment leads to administrative penalties in decisions from this

jurisdiction that are disproportionate to administrative penalties ordered in other jurisdictions in Canada.

[56] A general comparison of administrative penalties among jurisdictions is not relevant to our analysis as we are generally seeking guidance from previous orders that have been made by this Commission and, as the respondents submit, the particular circumstances of the respondents' misconduct and circumstances in this case.

IV. Orders

A. Market prohibitions

[57] We do not find that there is a reason, in this case, to depart from the almost invariable practice of imposing permanent market prohibitions on those who commit fraud. Wharram represents a significant future risk to our capital markets. The corporate respondents should be treated accordingly with respect to any future conduct in the capital markets.

B. Section 161(1)(g) orders

[58] Orders under section 161(1)(g) of the Act are meant to encompass those amounts obtained, directly or indirectly, as a result of the respondents' contraventions of the Act.

[59] In this case, Wharram obtained $517,500 as a result of his misconduct. He obtained these funds with the complicity of the various corporate respondents and the evidence is clear that the funds of the various corporate respondents were co-mingled. The evidence was that Wharram solely controlled and directed the day to day activities of the corporate respondents.

[60] For all of these reasons, a section 161(1)(g) order in the amount of $517,500 is appropriate in the circumstances. We were not persuaded that there is any reason, in the public interest, to reduce the order under section 161(1)(g) to an amount less than what Wharram obtained as a result of his fraudulent misconduct.

[61] As the evidence is clear that funds of the various respondents were co-mingled, in this case it is appropriate to make all of the respondents jointly and severally liable for the amount of the order under section 161(1)(g).

[62] Wharram has asked for an order that any future repayment of investor losses by him not be subject to section 15.1 of the Act. We cannot make this order. With respect to the section 161(1)(g) order for $517,500, those funds, as required by the Act, must be made subject to the disbursement procedures of section 15.1. Any amounts over and above the $517,500 section 161(1)(g) order and administrative penalty ordered under section 162 that Wharram may be in a position to pay to investors would happen outside the confines of the Act in its entirety. Wharram is free to make whatever payments to investors he wants. Any such payments would not reduce his obligation to pay the orders we are making under sections 161(1)(g) and 162.

C. Administrative penalties

[63] The executive director has asked for an administrative penalty of $1.6 million to be ordered, jointly and severally, against each of the respondents.

[64] The respondents suggest that no administrative penalty should be ordered in the circumstances; however, if we find that an administrative penalty is appropriate, then it should be $22,500.

[65] As noted above, the executive director has not asked that a separate sanction be imposed for Wharram's contravention of secton 168.1(1)(a). Rather, the executive director says that this misconduct should be treated as an aggravating factor in determining the appropriate sanction in this case. We do not agree with this approach. A separate contravention of the Act is not an aggravating factor relating to the fraud (particularly where, as is the case here, the lying to Commission investigators was unrelated to the fraudulent misconduct); rather, it is a separate contravention for which a separate sanction may be appropriate in the circumstances. We have presumed that the executive director's position is that the requested sanctions are appropriate for the entirety of the misconduct.

[66] We do not agree with the executive director's request that the amount of the administrative penalty be ordered, jointly and severally, against all of the respondents. Fundamentally, an administrative penalty, applied jointly and severally, is inconsistent with the principles of sanctioning. When considering specific deterrence in the context of the quantum of an administrative penalty, we must determine the amount of financial sanction as it may apply to each respondent. An amount applied, jointly and severally, may be enforced such that each respondent pays all or none of the amount ordered, or any amount in between. A specific respondent may not end up paying any amount, and therefore, there would be no specific deterrent effect of that order. This makes it impossible to determine if the actual administrative penalty is appropriate or not.

[67] For the reasons noted above, we do not find that a formulaic approach to the determination of the amount of an administrative penalty is generally appropriate. Fundamentally, sanctions must be applied in a manner proportionate to a respondent's misconduct.

[68] In this case, the investor losses were significant. Wharram's fraudulent misconduct was significant and repeatedly deceitful. As a consequence, it is necessary, for deterrence purposes, to order a significant administrative fine. Other market participants must know that significant financial sanctions will follow this type of misconduct.

[69] However, when we consider the quantum of an administrative penalty, we do not see that a penalty of $1.6 million (three times the amount involved in the fraud) is appropriate to either the misconduct of the respondents or Wharram's personal circumstances.

[70] This is not a case where there was never a legitimate business plan or where the securities sold were not legitimate. We have considered Wharram's financial circumstances, the reputational damage that these proceedings had on Wharram and the potential impact that this reputational harm may have on his future employment opportunities. We do not find any of these circumstances to be determinative in this case.

[71] Considering, and balancing, these goals of general and specific deterrence, and considering that Wharram also contravened section 168.1(1)(a) of the Act, we believe a $500,000 administrative penalty to be appropriate.

[72] Each of the corporate respondents was directed and controlled by Wharram. Wharram, and Wharram alone, is responsible for significant damage to investors through fraud.

[73] Therefore, we would not make any orders for administrative fines against the corporate respondents.

D. Summary of orders

[74] We make the following orders, in the public interest:

(a) with respect to Wharram:

i. under section 161(1)(b) of the Act, that he cease trading permanently, and be permanently prohibited from purchasing any securities or exchange contracts;

ii. under section 161(1)(d)(i) and (ii), that he resign any position that he holds as, and be prohibited from becoming or acting as, a director or officer of any issuer, registrant, or investment fund manager;

iii. under section 161(1)(d)(iii) of the Act, that he be permanently prohibited from becoming or acting as a registrant, investment fund manager or promoter;

iv. under section161(1)(d)(iv) of the Act, that he be permanently prohibited from acting in a management or consultative capacity in connection with activities in the securities market;

v. under section 161(1)(d)(v) of the Act, that he be permanently prohibited from engaging in investor relations activities;

vi. under section 161(1)(g) of the Act, that he pay to the Commission $517,500; and

vii. under section 162 of the Act, that he pay an administrative penalty of $500,000;

(b) with respect to the Falls:

i. under section 161(1)(b) of the Act, that all persons cease trading permanently, and be permanently prohibited from purchasing any of its securities;

ii. under section 161(1)(b) of the Act, that it cease trading permanently, and be permanently prohibited from purchasing any securities or exchange contracts;

iii. under section 161(1)(d)(iii) of the Act, that it be permanently prohibited from becoming or acting as a registrant, investment fund manager or promoter;

iv. under section 161(1)(d)(v) of the Act, that it be permanently prohibited from engaging in investor relations activities; and

v. under section 161(1)(g) of the Act, that it pay to the Commission $517,500;

(c) with respect to Deercrest:

i. under section 161(1)(b) of the Act, that all persons cease trading permanently, and be permanently prohibited from purchasing any of its securities;

ii. under section 161(1)(b) of the Act, that it cease trading permanently, and be permanently prohibited from purchasing any securities or exchange contracts;

iii. under section 161(1)(d)(iii) of the Act, that it be permanently prohibited from becoming or acting as a registrant, investment fund manager or promoter;

iv. under section 161(1)(d)(v) of the Act, that it be permanently prohibited from engaging in investor relations activities; and

v. under section 161(1)(g) of the Act, that it pay to the Commission $517,500;

(d) with respect to West Karma:

i. under section 161(1)(b) of the Act, that all persons cease trading permanently, and be permanently prohibited from purchasing any of its securities;

ii. under section 161(1)(b) of the Act, that it cease trading permanently, and be permanently prohibited from purchasing any securities or exchange contracts;

iii. under section 161(1)(d)(iii) of the Act, that it be permanently prohibited from becoming or acting as a registrant, investment fund manager or promoter;

iv. under section 161(1)(d)(v) of the Act, that it be permanently prohibited from engaging in investor relations activities; and

v. under section 161(1)(g) of the Act, that it pay to the Commission $517,500; and

(e) Wharram, The Falls, Deercrest and West Karma be jointly and severally liable for the $517,500 ordered under section 161(1)(g) and that no amount in excess of $517,500 be paid by them under those orders.

November 25, 2015

For the Commission

Nigel P. Cave
Vice Chair

George C. Glover, Jr.
Commissioner

Judith Downes
Commissioner

Don Rowlatt
Commissioner