

Plain Language Style Guide

June 2002



BCSC

BRITISH COLUMBIA SECURITIES COMMISSION

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The Plain Language Style Guide, a living document

We believe securities regulation should be clear and understandable to all market participants – from sophisticated securities professionals to unsophisticated investors. Instead, the opposite is true for most market participants.

It was time to do something to change this. We made using plain language in all Commission documents a strategic priority.

This guide is one of several tools we will use to help us achieve our goal. It is not the final word. Rather, see this guide as a living reference – one that will be changed periodically to accommodate our experience and your suggestions for improvement.

We recognize that using plain language effectively in all our communications is an ongoing process. We will make mistakes. However, if we encourage and help each other to follow the principles in this guide, I believe we will be successful in making plain language part of our culture and securities regulation easier to understand.

Joyce C. Maykut, QC
Vice Chair

Contents

1. Planning the Text	3
2. Designing the Text	7
General standards	7
BCSC logo	7
BCSC templates	7
Font size	7
Headings	7
Italics	7
Justification	7
Letterhead	8
Lists	8
Multi-level numbering	8
Paragraphs	8
Punctuating lists	8
Quoted text	8
Sentences	8
Typeface	8
White space	8
Standards for formal BCSC documents	9
Title	9
Date	9
Signature block	9
3. Writing the Text	13
CLARITY* – the seven plain language principles	13
Conciseness	14
Lean language	16
Active voice verbs	17
Regular and reasonable language	19
Image-evoking, concrete, and specific	21
Tight organization	26
You and your audience	32
Plain language substitutes for commonly used phrases	34
Abbreviations	36
Act, regulation and rules	36
Capitalization	37
Dates	37
Defined terms	38
Footnotes	38
Local and national instruments	38
Money	39
Numbers	40

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Punctuation	44
Colons	44
Commas	44
Hyphens	45
Periods.....	47
Semicolons.....	48
Spelling.....	49
Reflexive pronouns.....	49
Time.....	50
4. Support For Your Plain Language Writing.....	53
Basic references available on each floor	53
Plain language on the staffweb.....	53
Plain language mentors	54
Appendix A - Sample Correspondence.....	55
Single page letter.....	57
Multiple page letter	58
Memorandum.....	60
Fax cover.....	61
Envelopes	62
Appendix B - Creating a Neutral Citation Document and Publishing it on the Website.....	63
Neutral citation numbering system	65
Neutral citation document – creation and publication	66
Rules for paragraph numbering in neutral citation document	67
Example 1	70
Example 2	72

Planning the Text

Planning the Text

Read the following questions and explanations to help you think about your document. Then use the *Planning Guide Form* on the staffweb to help you plan and begin to write. You may wish to print it out to work on.

Writers vary in their needs to write at different stages in the writing process. The questions below will help with the first (writing-for-self) and second (writing-for-others) stages.

- | | |
|---|--|
| 1. Who are your readers? | Identify your audience. You may have primary, secondary and third-level readers. Write so all readers understand. |
| 2. Why are you writing? | Early in the document, clarify your purpose. You may need to jot down a few ideas before you know why you are writing. |
| 3. How do you want your readers to respond to your writing? What else might your readers want to know or do after reading your document? | Do you want them to provide views on your policy? Fill in a registration form? Follow a regulation? If you want your readers to complete a task, provide a step-by-step action guide, i.e., step 1: complete the attached form; step 2: forward to the BCSC by the deadline. Using a numbering system and providing step-by-step guidelines will help your readers complete the required task. |
| 4. What is the best format for your message? | Would it work best as a letter, brochure, policy statement, form, procedure, or formal decision? Would it help your readers understand if you used charts or another type of graphic to communicate detailed information? |
| 5. What details do your readers need? | Outline everything your readers need to know. Remember, your readers may not be experts in securities requirements. Think of how you can best communicate with your readers given their level of expertise |
| 6. Is there any part of your message that is complex? Or crucial to remember? | Break the complex parts into simple steps. Highlight deadlines or set locations and times apart with white space. |

7. What is the key point for your readers?	Use a descriptive subject heading for the most important information. The first paragraph or a summary section should provide a map for your readers.
8. In what order should you put this information to get your message across?	Think of your readers to decide the best way to logically, persuasively, or sensitively convey the information. If the message is bad news, you may need a buffer or backgrounder beforehand. Or, it may be inappropriate to keep the bad news to the end. Generally, good news should come at the start of a document.
9. Do your readers understand securities or financial language?	You are writing for an audience not for yourself. Be aware of your readers' level of expertise and their needs. Avoid jargon, legalese, or other technical terms. Explain specialist terms in plain language. Some BCSC language is not even understood by all BCSC employees, and especially not by most of the public. If you must use an acronym, define it the first time you use it in your document.
10. What design elements will best help your readers understand your message?	Think about white space, summaries, headings and subheadings, margins, examples, visuals including diagrams, flowcharts, tables and formulas, question and answer formats, and boxes or shading.
11. Should your information be segmented?	Place background or supportive material in attachments. If you want a contract signed or a form filled out and returned, separate it from the covering letter or instructions.

Designing the Text

Designing the Text

This part of the style guide sets out the general standards you will need to follow to prepare Commission documents. We have developed these standards to ensure that our documents:

1. have a consistent look
2. are easy to read on screen or on paper
3. lend themselves to an electronic database search

To apply these standards, you may have to change the way you do things.

General standards

Use these standards in all Commission documents.

BCSC logo	Refer to the staffweb or contact the Communications Branch for the specific standards that apply to the use of the BCSC logo.
BCSC templates	Use the BCSC templates when creating a new letter, memo and fax cover.
Font size	Use a 12-point font for text.
Headings	Use subject headings and subheadings to tell your story. They allow readers to skim the document and re-read relevant sections easily. Bold your headings and subheadings to differentiate them from text. Also consider using a different size font to distinguish your headings from your subheadings. If your document has two orders of headings (i.e., headings and subheadings) you may insert a space between heading and text, but do not insert one between subheading and text. If your document only has one order of headings do not insert a space between headings and text.
Italics	Avoid italics in continuous text unless you are referring to the <i>Securities Act</i> , <i>Securities Regulation</i> , or <i>Securities Rules</i> (see page 33) or to titles of reports, books or publications. Occasionally, you might use italics for emphasis.
Justification	Use <i>left align</i> to ensure consistent word spaces and use indentation to make your text flow better. Use indentation for quoted text longer than three lines and a list within a paragraph.

Letterhead	Use the BCSC letterhead for original letters. Do not add your division's name at the top of the letter. Rather, include it in the signature block.
Lists	Use lists to make your text easier to read, to create emphasis or to make points. You may use bullets, arrows or other symbols to separate each item in your list. You may also use numbers. Consider using a heading instead of a sentence with an umbrella phrase like <i>the following</i> to introduce your list.
Multi-level numbering	If you want to use a multi-level numbered list, use 1(a)(i)(A) as your multi-level numbering sequence and <i>left align</i> for your first level of numbering (i.e., 1). This will help give our documents a consistent look. Keep in mind that you are not required to use multi-level numbering in any Commission documents, except in documents that must be prepared using the neutral citation template.
Paragraphs	Use single spacing for your text and double spacing at the end of sections and between paragraphs.
Punctuating lists	Refer to the rules in the <i>punctuation section</i> of this guide for the preferred way of punctuating lists. Use common sense. It may be appropriate to depart from these rules to ensure the legal meaning of a formal document is clear.
Quoted text	If the quoted text is over three lines, introduce it with a colon, add a space before and after the quotation and indent the quoted material. If the text you are quoting is three lines or less, introduce the quote linearly in your sentence and put quotation marks around it.
Sentences	Use only one keystroke after a period (or other punctuation mark ending a sentence) and before the first word of the next sentence.
Typeface	Use the serif typeface, Times New Roman.
White space	Let your document "breathe". Include visuals (tables, charts, graphics, diagrams, etc.) for variety. Readers appreciate the clarity of appropriate visuals that are integrated into text rather than in an attachment.

Refer to Appendix A for *Sample Correspondence* prepared using these general standards and other standards specific to BCSC correspondence.

If you are creating a document using the neutral citation template follow the rules set out in Appendix B *Creating a Neutral Citation Document and Publishing it on the Website*.

Standards for formal BCSC documents

Use these standards when you prepare a Commission document under a section of the Act, Regulation or Rules, like an order, certificate, notice etc.

Title Centre the title. In the first line, describe what the document is, for example an Investigation Order, Freeze Order etc. In the second line, name the parties. In the third line, state the statutory authority relied on to issue the document. Put a space between each line.

Do not capitalize the entire title. Only capitalize the first letter of the key words (title case). Bold the title for emphasis.

Date Do not use the word “Dated”. Use *left align* and insert the date above the signature block. Use this format: *name of the month* (in full, never abbreviated or represented by figures), *day* (in figures followed by a comma), and *complete year*. Do not use “Vancouver, British Columbia”.

Signature block Use *left align* and leave four to six lines between the date and the first line of the signature block. Put the name of the person signing the document on the first line of the signature block and the title of the person, on the second line. Use title case for the position title, i.e., capitalize the first letter of key words.

Writing the Text

Writing the Text

CLARITY* – The seven plain language principles

Conciseness

Lean language

Active voice verbs

Regular and reasonable language

- Gender-neutral and gender-free language

Image-evoking, concrete and specific

Tight organization

You and your audience

Understand that there is more than one way to put documents into plain language. Use common sense when you apply these principles.

Keep your *Clarity Deskfinder* handy. It is also posted on the staffweb.

^{*}The **CLARITY** formula is copyrighted material and is used in this *Style Guide* with the permission of Wordsmith Associates Communications Consultants Ltd.

Conciseness

The conciseness principle works with the other CLARITY principles to create succinct sentences, paragraphs, and headings. A good general rule is to keep sentences under 35 words at most but to average from 20 to 25 words per sentence. This does not mean plain language writing produces short, choppy sentences. Plain language text should exhibit a variety of sentence lengths and reflect the grace and rhythm of excellent prose. Paragraphs should not exceed seven or eight lines.

- 1. Look for patterns in the writing that allow listing of comparable items. Patterns include similar actions, concepts, or steps in a process.**

Before

For discussion purposes, the draft policy has been prepared following the principle of harmonization. It follows Ontario Securities Commission By-Law No. 2, both as to substance and form. Deviations were made only to be consistent with our *Securities* legislation, except Part 2 of the *Securities Regulation*. The comments appearing in the draft policy deal with all the provisions of Part 2 of the *Securities Regulation*, and, to the extent the draft policy deviates from Part 2 of the *Securities Regulation*, the deviations are pointed out. The comments also deal with Alberta Securities Commission Codes of Conduct for members and employees. Where there are significant deviations from the draft policy, these deviations have been pointed out. Copies of Part 2 of the *Securities Regulation*, OSC By-Law No. 2 and the ASC Codes of Conduct for members and employees have been included with this memorandum.

(143 words)

After

We have prepared a draft policy for discussion modeled in both form and substance on Ontario Securities Commission (OSC) By-law No. 2. The draft policy notes differences from:

1. OSC By-law No. 2
2. part 2 of the *Securities Regulation*
3. the *Codes of Conduct* for members and employees of the Alberta Securities Commission

Included with this memorandum are copies of the three source documents.

(67 words)

2. Avoid the overly busy two-preposition structure highlighted below and abstract language such as *product structure*.

Before	After
Rules governing the operations of or service providers to the product structure	Rules for operators and service providers of the product

3. Prune out extra words and repetition to shorten the sentence.

Before	After
<p>As a result of the recent adoption of new Ontario Securities Commission (“OSC”) Rules, issuers who are reporting issuers in Ontario are subject to the following new financial statement reporting requirements for fiscal periods commencing January 1, 2001 or later:</p> <p style="text-align: right;">(40 words)</p>	<p>The Ontario Securities Commission (OSC) adopted new financial reporting rules. For fiscal periods beginning in January 2001 or later, reporting issuers in Ontario must:</p> <p style="text-align: right;">(24 words)</p>

Before	After
<p>Should any space be insufficient for your answers, a statement may be attached and marked as an exhibit cross-referencing each statement to the item to which it pertains providing it is initialled by the applicant and the Commissioner taking the affidavit.</p> <p style="text-align: right;">(41 word sentence)</p>	<p>If you run out of space for an answer:</p> <ol style="list-style-type: none"> 1. Attach a statement or continuation of your answer. 2. Mark it as an <i>Exhibit</i> at the top. 3. Write at the top of the <i>Exhibit</i> the item number you are answering. 4. Initial the <i>Exhibit</i> yourself, and ensure the Commissioner taking the affidavit initials it. <p style="text-align: right;">(one 9-, two 8-, and two 13-word segments)</p>

Lean language

The lean language principle eliminates language that is elitist, legal, bureaucratic, clichéd, pompous, wordy, dense, or redundant. It substitutes plain language for specialist languages such as legalese or financial and securities-related jargon that a reader outside the field would not know.

- 1. Avoid the language of the courts.** Use more natural language, not the highlighted legalese. Note that you should replace *with respect to* with *for* and *recommend for submits*. The sentence below uses *staff* as a plural.

Before	After
Staff submits that, with respect to the proposed penalty, the Commission ought to consider...	Staff recommend that, for the proposed penalty, the Commission consider .

- 2. Eliminate common redundant expressions.**

Before	After
Mr. XXX should not engage in investor relations activities for a period of 10 years and should pay a penalty in the amount of \$15,000.	Mr. Xxx should not engage in investor relations activities for 10 years and should pay a penalty of \$15,000.

- 3. Use verbs instead of nouns when possible.** Non-plain language writers try to inflate their language with multi-syllabic noun forms. *Implement* is easier to read than *implementation*.

Before	After
I enclose a new settlement agreement for signature by your client.	I enclose a new settlement agreement for your client to sign.

Active voice verbs

Use the active voice whenever you can, *doing rather than being done to*. To do this, identify the person or thing performing the action and place the agent before the action or verb. It is shorter, less ambiguous, more direct, and adds a human element to the document. Readers read documents in the active voice faster than those written in passive voice.

Note that using the active voice does not always mean writing personally—see the last two examples in the box below. In the first and fourth examples below, the change from passive to active voice required a new word for the active voice substitute.

Passive voice	Active voice
For the above reasons, it is requested that the requested relief be granted .	For the above reasons, <i>staff</i> (or we) recommend that the Commission grant the requested relief.
The following agreement has been reached between Alex M. Astute and the Executive Director:	Alex M. Astute and the Executive Director agree to the following:
As a result, similar information is collected, processed and maintained on several different registration systems.	As a result, several different registration systems collect, process, and maintain similar information.
The services provided and resulting remuneration must be reflected in an agreement between the dealer and the salesperson’s corporation.	The agreement between the dealer and the salesperson’s corporation must describe the services provided and the resulting remuneration.

The use of personal pronouns with active voice verbs is a characteristic of plain language. However, be careful to avoid the pitfall of repetitive structures. The *after* below illustrates different ways to both maintain the active voice and vary the sentence structure. Starting every sentence with *We + a* is monotonous. Listen to the sound and flow of your words.

Before

Within our own regulatory system in BC, **we have launched** a major effort to streamline our rules and policies and to rewrite all of our documents in plain language. **We want** to make regulation clear and to organize it logically, so market participants can easily access information and understand rules. **We have already eliminated** 140 policies and rules. **We will consolidate** the remaining ones into a single numbering system and review them annually to consider whether they are still required.

We have also emphasized education of investors and industry participants as important tools of regulation. **We presented** investor education seminars across the province to “street proof” the public from fraudulent and abusive investment schemes. **We also teamed-up** with Junior Achievement (JA) to develop and present high school programs across BC on economics and personal investing.

After

Within our own regulatory system in BC, **we have launched** a major effort to streamline our rules and policies and to rewrite all of our documents in plain language. **Our intent is to** make regulation clear and to organize it logically, so market participants can easily access information and understand rules. **Already, we have** eliminated 140 policies and rules. **Our final tasks are to consolidate** the remaining ones into a single numbering system and review them annually to consider whether we still need them.

The Commission has also emphasized education of investors and industry participants as important tools of regulation. **Our presentations of** investor education seminars across the province **helped to** “street proof” the public from fraudulent and abusive investment schemes. **Teaming up** with Junior Achievement (JA), **we developed and presented** high school programs across BC on economics and personal investing.

Regular and reasonable language

The regular and reasonable principle focuses on correct grammar, spelling, punctuation, capitalization, technical presentation issues, and gender-free or gender-neutral usage. The table below gives examples of common mistakes.

Incorrect	Correct	Problem
The interviewer can exploit this reaction by asking behavior observation questions (BOQ's).	... (BOQs).	There is no apostrophe for plural abbreviations.
The Securities Act was breached by this issuer.	This issuer breached the <i>Securities Act</i> .	Italicize references the <i>Securities Act</i> (and you could use the active voice here).
We are prepared to recommend that the prohibition excludes private issuers.	We are prepared to recommend that the prohibition exclude private issuers.	The subject and verb must match in number.
The Commission questioned Mr. Morris' credibility and listened to the witness' reply.	The Commission questioned Mr. Morris's credibility and listened to the witness's reply.	Use an 's for possession of a word with an s sound if a new syllable is formed in pronouncing the 's.
We found his explanations self serving and incredible.	We found his explanations self-serving and not credible.	Check meanings and spellings (including hyphen) in an up-to-date dictionary or the <i>Gregg Reference Manual</i> .
The Atlantic Corporation ("Atlantic")	... (Atlantic)	Delete quotation marks for defined terms, abbreviations or acronyms in parentheses.
Based on the results of the survey, the CSA rewrote the policy. (Here, the CSA is based on the results of the survey!)	The CSA rewrote the policy using the results of the survey.	Rewrite to overcome the misplaced modifier.

Gender-neutral and gender-free language

Professional writing and English teaching organizations have been promoting gender-neutral language for over 30 years. The following examples present typical challenges.

The traditional use of the masculine pronouns (*he* or *his* to stand for both masculine and feminine) is unacceptable in modern writing. **Gender-neutral language** advocates sometimes using *he or she* or *him or her*. Their occasional use may be non-intrusive. However, their repetitive use distracts and annoys readers. **Gender-free language** is preferable. The following examples illustrate gender-free strategies. The Law Reform Commission of British Columbia, as well as North American English teaching organizations, advocate this approach.

1. Eliminate the reference to the object.

Before	After
A well-advised insider will do his best to provide for anticipated changes.	A well-advised insider will provide for anticipated changes.

2. Replace his with *the* or *a*.

Before	After
This letter describes requirements that apply after a registrant receives his certificate.	This letter describes requirements that apply after a registrant receives the certificate.

3. Use the plural instead of the singular.

Before	After
The borrower who is not prompt in making the payments due under his mortgage risks losing his home through a foreclosure procedure.	Borrowers who are not prompt in making the payments due under their mortgages risk losing their homes through a foreclosure procedure.

4. Recast the sentence to eliminate the possessive reference.

Before	After
If a salesperson has been involved with money laundering, his registration will be cancelled.	The Commission will cancel the registration of a salesperson engaging in money laundering.

Image-evoking, concrete, and specific

The image-evoking principle applies to both text and design. We know that images are more memorable than abstractions. Vocabulary that creates images in the reader's mind is more persuasive and readable. Similarly, variety of text layout, white space, itemization, tables, charts, and other design or graphic features make text easier, more interesting, and quicker to process. Try to keep paragraphs to a maximum of seven or eight lines.

Examples of vivid text

The following passages engage readers because of their effective, image-evoking style. Examples of vivid language are highlighted below:

The cognitive interview

The cognitive interview is a **cousin of hypnosis**. It encourages subjects to recreate the entirety of their state of consciousness at the time of the event in question. The interviewer asks subjects to recall such elements as their emotional state, what they were smelling, the feel of clothing against the skin, background sounds, etc. In this manner, all of the senses, not just sight, **are recruited to the memory process**. **Other avenues** include asking the subject to remember events in reverse chronological order.

New detectors of securities fraud and suspect trading practices

What the program does is allow our investigators to re-create the purchase and sale of securities on stock exchanges across Canada. A key feature is the ability to identify which purchasers bought shares from a particular seller. **It's not just like being able to find the needle in the haystack. It's like finding the needle and the thread that went through it.** The software has reduced the time it takes to analyze trading data from months to weeks.

Example of image-evoking design

Before

New Ontario Financial Statement Reporting Requirements - January 2001

As a result of the recent adoption of new Ontario Securities Commission (“OSC”) Rules, issuers who are reporting issuers in Ontario are subject to the following new financial statement reporting requirements for fiscal periods commencing January 1, 2001 or later:

1. ***Interim MD&A:*** interim MD&A must be included along with interim financial statements;
2. ***Additional Prescribed Content:*** interim financial statements must now also include a balance sheet, statement of retained earnings, and income and cash flow statements for the latest three month period (and notes thereto);
3. ***Balance Sheets:*** balance sheets included in either interim or annual financial statements must include 14 specified line items, subject to certain thresholds; and
4. ***Requisite Approval:*** interim financial statements must be reviewed by either the board of directors or the audit committee, prior to filing or mailing.

These changes are a result of the implementation of OSC Rule 51-501 - AIF and MD&A (which replaces OSC Policy 5.10) and OSC Rule 52-501 – Financial Statements, and are each discussed in further detail below.

(179 words)

After

New Ontario financial statement reporting requirements

January 2001

The Ontario Securities Commission (OSC) adopted new financial reporting rules. For fiscal periods beginning in January 2001 or later, reporting issuers in Ontario must:

- 1. Interim MD&A** Include an interim MD&A with interim financial statements.
- 2. Interim financial statement** Include a balance sheet, statement of retained earnings, and income and cash flow statements for the latest three-month period (with related notes).

Have either the board of directors or the audit committee review the interim financial statements before filing or mailing.
- 3. Balance sheets for interim or annual financial statements** Include 14 specified line items, subject to certain thresholds.

These changes result from the new OSC Rule 51-501 *AIF and MD&A* (which replaces OSC Policy 5.10) and OSC Rule 52-501 *Financial Statements*, and are each discussed in further detail below.

(135 words)

Consider how the design in the *before* example makes the text more difficult to read and in the *after*, easier.

Feature	Before	After
Indentation	The left margin has three levels of indentation and presents a busy look.	We used <i>align left</i> . The look is cleaner.
Justification	The text is justified right creating uneven spaces between words in different sentences. Compare the last two lines in the original	We used <i>align left</i> .
Titles	The main heading is underlined. Underlined text fights with the letters' descenders (vertical parts of letters that hang over the line), and the bolding, and is more difficult to read.	The main heading is only bolded, not underlined.
Headings	Headings are italicized and bolded. Italics are hard to read in extended text.	Just bold headings. Bolding is preferable for a first order heading.
Relative size of headings	Perhaps the author used italics to make the subheadings different from the title.	Instead, the redesign makes the title slightly larger (13-point instead of 12).
Structure of headings	The numbered headings were a mixture of categories: documents and changes to treatment of documents.	The rewrite recombines the material under three document categories.
Verb voices	Text in the original included passive voice constructions. As well, the items camouflaged the instructions.	We have changed some sentences to active voice. See line 1 of items 1 and 4 for examples. Using the command format (imperative, which is active voice) makes procedures easier to follow.

Feature	Before	After
Punctuation	Semicolons at the ends of items are a heavy punctuation mark.	Periods are simpler.
Sentence length	The 40-word first sentence is difficult to read. The last sentence is 36 words and includes a passive voice	The rewrite is 24 words. Shorter sentences look more inviting. The rewrite breaks it into a 25- and an 8-word sentence. The active voice introduces the writers with <i>we</i> .
Spacing	The beginning “hugs” the title too closely. The page needs breathing room.	We have added space.
Correctness issues	Language such as <i>thereto</i> is intrusive. <i>Three-month</i> is not hyphenated in the <i>before</i> . (Point 2)	We corrected these items.
Sentence format	The text after the four headings is in sentence format, yet there are no capitals at beginnings of the sentences in the original.	We used standard capitalization at the beginning of sentences to create a more natural look.

Tight organization

Tight organization refers to the effective functions and connections of the various parts of a document. A helpful formula is Star → Chain → Hook. The *star*, or opening segment, introduces the purpose, focus, or theme of the document. As a star, it must attract the reader’s attention, and, if possible, save the reader time. The *chain* represents the logical links in the body of the organization. Narrative, chronological, visual (for example, parallel headings to “tell the story”) or causative links are good examples. The last segment of the organizing formula is the *hook*, usually an action hook. It makes action easy and provides the next steps, or recommendations. This is the place for deadlines, contacts, telephone numbers, or e-mail addresses.

Changing a traditional opening to a plain language *star*

Before

**IN THE MATTER OF THE SECURITIES ACT
R.S.B.C. 1996, C. 418**

AND

**IN THE MATTER OF XONO AND
YONO FINANCIAL CORPORATION**

Commission Staff’s Penalty Submission

After

Staff’s Penalty Submission

Xono and Yono Financial Corporation

Section 161 of the *Securities Act*, RSBC 1996, c. 418

Comments on changes

1. Eliminates the difficult-to-read capitals and the legalese.
2. Restructures to place the purpose of the document first.

Changing a traditional layout to a plain language *chain*

Example 1

Before

IN THE MATTER OF THE SECURITIES ACT
R.S.B.C. 1996, c. 418

AND

IN THE MATTER OF *

Appointment Under Section 39

WHEREAS * (“*”) is registered under the *Securities Act*, R.S.B.C. 1996, c. 418 (the “Act”) as a mutual fund dealer;

NOW THEREFORE the Executive Director, pursuant to section 39 of the Act, appoints * to review the business and conduct of * in order to establish that * has complied, and is complying, with the Act and the regulations;

AND TAKE NOTICE that on production of a copy of this Appointment, * may enter the business premises of * during business hours, examine the records required to be kept under the Act or the regulations, make copies of these records, and make inquiries of persons employed by * concerning the operations and procedures of*;

AND TAKE NOTICE that a person must not withhold, destroy, conceal or refuse to give any information, or produce any record or thing reasonably required for review under this Appointment.

DATED at Vancouver, British Columbia, on September 30, 2001.

Name
Director, Capital Markets Regulation

After

Appointment to Review

Atlantic Corporation

Section 39 of the *Securities Act*, RSBC 1996, c. 418

Appointment to review

Atlantic Corporation is a registrant under the Act. Under section 39 of the Act, I appoint John Smith to review the registrant's business and conduct. The purpose of the review is to determine if the registrant has complied, and is complying, with the Act and the Regulation.

Reviewer's authority and process

Once Smith gives you this order, Smith has the authority to visit the registrant's premises during business hours and can:

1. examine the records the registrant is required to keep
2. copy these records
3. ask questions of employees about the registrant's operations and procedures.

Obligation to provide information

No one may withhold, destroy, conceal, or refuse to give any information, or refuse to produce any records, document or other thing reasonably required for review.

September 30, 2001

Name

Director, Capital Markets Regulation

Comments on changes

1. The headings focus on the links in the chain of thought. The *Before* is unhelpful. Its capitalized traditional WHEREAS, NOW THEREFORE, and AND TAKE NOTICE are bewildering headings. The new headings summarize the key information in the notice.
2. The structure in the original is confusing at best. It is:
Whereas X; now therefore Y; and take notice Z; and take notice W.
The rewrite uses complete and correct sentence structure. It is easier to read.
3. The rewrite personalizes the notice but retains the appropriate degree of formality.
4. To facilitate using the document as a form, the rewrite avoids defining Atlantic Corporation (in the title or elsewhere in the document) by making it clear in the first sentence that it is a registrant and using the word *registrant* throughout.

Example 2

Before

IN THE MATTER OF THE SECURITIES ACT

R.S.B.C. 1996, c. 418

AND

IN THE MATTER OF *
(the “Registrant”)

Order for Production Under Section 141

WHEREAS the Registrant is a registrant under the *Securities Act*, R.S.B.C. 1996, c. 418 (the “*Act*”);

AND WHEREAS the following information and records are required to be provided or produced for the administration of the *Act*, and in respect of matters relating to trading in securities in the Province of British Columbia;

NOW THEREFORE pursuant to section 141 of the *Act*, the Registrant is hereby ordered to provide the following information and produce copies of the following records by delivering them, before 4:30 p.m., *, to Rodney Blook, Investigative Assistant, at 701 West Georgia Street, Vancouver, British Columbia, V7Y 1L2:

1. the account opening documents, including any trading authorization or power of attorney, for all accounts in the name of any of the following:

- (a) *;
- (b) *

(collectively, the “Accounts”); and

2. the monthly statements of account for the Accounts for the months of * through present.

DATED at Vancouver, British Columbia, on *.

Name
Director, Capital Markets Regulation

Example 2

After

<p style="text-align: center;">Order to Produce Information</p> <p style="text-align: center;">Atlantic Corporation</p> <p style="text-align: center;">Section 141 of the <i>Securities Act</i>, RSBC 1996, c. 418</p> <p>Background Atlantic Corporation is a registrant under the Act. The Act requires the registrant to provide the following information and records for the administration of the Act and for matters relating to trading in securities in British Columbia.</p> <p>The order Under section 141 of the Act, the registrant is ordered to provide copies of the following information:</p> <ol style="list-style-type: none">1. the account opening documents, including any trading authorization or power of attorney, for all accounts in the name of the following:<ol style="list-style-type: none">(a) *(b) *2. the monthly statements for these accounts for January 2001 to the present. <p>Deadline The registrant must deliver these materials before 4:30 pm, on August 15, 2001 to: Rodney Blook, Investigative Assistant, at 701 West Georgia Street, Vancouver, British Columbia, V7Y 1L2.</p> <p>January 30, 2001</p> <p>Name Director, Capital Markets Regulation</p>

Comments on changes

1. Even though this document is an order, it is not a type of order that is published on our website and therefore does not require the use of the neutral citation numbering system.
2. To facilitate using the document as a form, the rewrite avoids defining Atlantic Corporation (in the title or elsewhere in the document) by making it clear in the first sentence that it is a registrant and using the word *registrant* throughout.

Changing a traditional ending into a plain language *hook*

Before

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 9th day of April, 2001

Name
Counsel for Commission Staff

After

April 9, 2001

Name
Counsel for staff

You and your audience

Y refers to audience sensitivity and achieving the appropriate, but always professional, tone. Adjust the following factors to your readers:

vocabulary..... technical to lay language?
type of context summary to detailed?
style formal to informal?
format a notice? a letter? an order?
length..... short to long?
tone..... analytic? authoritative? persuasive? co-operative?

Some documents we prepare under securities legislation do not need to be formal. For example, you may choose to issue a certificate under section 77 of the Act as a letter.

Before

<p>CERTIFICATE</p> <p><u>under Section 77 of the Securities Act</u></p> <p>September 10, 2001</p> <p>Re: eCOMPUTER Corporation Scan ID#123456 File # X012345-4</p> <p>I certify that on this date, the information on file with the British Columbia Securities Commission indicates that eCOMPUTER Corporation is a reporting issuer pursuant to the <i>Securities Act</i>, R.S.B.C. 1996, c.418., and is not in default of filing financial statements required by the <i>Act</i> or the <i>Securities Rules</i>, B.C. Reg. 194/97 or paying fees and charges prescribed by the <i>Securities Regulation</i>, B.C. Reg. 196/97, relating to those filings.</p> <p>Name Supervisor, Financial Reporting</p>
--

After

September 10, 2001

Scan ID#123456

File # X012345-4

eCOMPUTER Corporation
P.O. Box 000
000 – 000 West Georgia Street
Vancouver, BC V1V 1V1

Dear eCOMPUTER Corporation:

Certificate under section 77 of the *Securities Act*, RSBC 1996, c. 418

I certify that, on this date, the information on file with the British Columbia Securities Commission indicates that eCOMPUTER Corporation is:

1. a reporting issuer under the Act
2. not in default of filing financial statements required by the Act or the *Securities Rules*, BC Reg. 194/97
3. not in default of paying fees and charges prescribed by the *Securities Regulation*, BC Reg. 196/97

Yours truly,

Name
Supervisor, Financial Reporting

cc: Law Firm
Barristers and Solicitors

Note: If the name of the issuer contains capital letters, type the name accordingly in any Commission document.

Plain language substitutes for commonly used phrases

Original	Suggested substitute
advised	told, informed, <i>or</i> asked
affidavit	sworn statement
apportionment of costs	apportioning costs <i>or</i> dividing up <i>or</i> deciding on the costs
arising out of	from
assemble evidence	collect evidence
determination	finding
disposition (as in “I will refer the matter to X for disposition”)	for action <i>or</i> for a decision
evidence the indebtedness of Mr. X	show Mr. X’s indebtedness
following their termination of employment	after their employment ends
further to	as a follow up <i>or</i> following our discussion
held	stated <i>or</i> concluded
I make oath and say	I swear <i>or</i> affirm
in accordance with	under <i>or</i> following
in order to	to
in respect of <i>or</i> with respect to	for, about, <i>or</i> on
in the event that	if
in the matter of	the case of <i>or</i> delete
issuance	issuing

Original	Suggested substitute
material evidence [*]	significant <i>or</i> relevant evidence
material period	the relevant period <i>or</i> the period in question <i>or</i> that period
monies	money
perpetrated a fraud	committed a fraud
pursuant to the <i>Act</i>	under the Act <i>or</i> the Act requires
receipt evidencing a loan	receipt for a loan
style of cause	title <i>or</i> name of proceeding
submits	thinks <i>or</i> believes <i>or</i> recommends
the requested relief	the request for an exemption, <i>or</i> specify the relief <i>or</i> order <i>or</i> penalty
to address the issue	to solve the problem, to respond to the issue, to consider <i>or</i> tackle an issue, to handle it, describe it, come up with a solution
undertaking	promise
valuable consideration	in exchange for (money, etc.)
waives any right	gives up any right
where	when <i>or</i> in the case of (use “where” only for location)
would not be prejudicial	would not prejudice

For more plain language substitutes, see *Mark my Words!* on the staffweb.

^{*} *Material fact* and *material change*, however, are defined in the Act. Sometimes it is appropriate to use these words. Other times, you should use a substitute. Consider the following substitute for material fact: “a fact that could significantly affect the value or price of a security”.

Abbreviations

These are the rules for abbreviations:

1. **When referring to the Commission**, use the British Columbia Securities Commission, the Commission, or the BCSC depending on the context.
2. **When referring to the Canadian Securities Administrators**, use the Canadian Securities Administrators or CSA.

Note: When using the CSA, use as the plural (The CSA are issuing a news release.).

3. **When abbreviating British Columbia** in text, use BC. When a document contains only a few references to the province, spell out its name.
4. **Do not combine abbreviations and full names** (for example, use British Columbia and Alberta; do not use, BC and Alberta).

Act, Regulation and Rules

When you first refer to the Act, Regulation or Rules in a document, use italics and write:

- *Securities Act*
- *Securities Regulation*
- *Securities Rules*

When you subsequently refer to the Act, Regulation or Rules, in the same document, use the regular font and write:

- Act
- Regulation
- Rules

If you need a citation, use the following:

- *Securities Act*, RSBC 1996, c. 418
- *Securities Regulation*, BC Reg. 196/97
- *Securities Rules*, BC Reg. 196/97

If you want a general reference to the requirements of the Act, Regulation or Rules, use securities legislation.

Capitalization

These are the rules about capitalizing words:

Do's

1. **Capitalize the first letter of the first word of every sentence**, including complete sentences in a numbered or bulleted list.
2. **Capitalize the first letter of Commission, Act, Regulation and Rules.**

Don'ts

1. **Do not capitalize the first letter of** staff, internet, website, staffweb and e-mail.
2. **Do not capitalize the first letter of defined terms** even if they are defined in the Act, the Regulation or the Rules, a definition section, or the body of the text, because capitalizing intrudes on the reading process.
3. **Do not capitalize the first letter of position or division titles in text** (including the chair, the vice-chair, a commissioner, the executive director and, any director, manager or other title), except in formal documents and in signature blocks.
4. **Do not capitalize the first letter of key words for emphasis** (for example in a heading or subheading), except in titles of documents (for example, Notice of Hearing, Temporary Order, etc.).
5. **Do not use continuous capital letters.**

Refer to the *Gregg Reference Manual* for other more specific rules on capitalization.

Dates

These are the rules for using dates:

1. **Use the following dateline format in business correspondence and other documents:** *name of the month* (in full, never abbreviated or represented by figures), the *day* (in figures followed by a comma), and the *complete year*.

April 9, 2002 (**not** Apr. 9, 2002, April 9th, 2002 or 04.09.01)

2. Note the use of commas and other punctuation in writing dates.

On October 28, 1999, we bought our house. Charges for February 2001 hit an all-time high.

The June 2001 issue of *Insight* was exceptional.
(Commas are not needed when just the month and year are used as an adjective.)

The July 15, 2001, *Globe and Mail* front page focused on Beijing winning the 2008 Olympics. (Use two commas to set off the year when a complete date serves as an adjective.)

Defined terms

Minimize the use of defined terms. Define a term only if necessary to avoid confusion and, if you do, do not use quotation marks and do not capitalize the defined term.

Footnotes

Avoid overusing footnotes. You should only use footnotes if necessary to provide an explanation that would otherwise interrupt the flow of the text.

If you must, use footnotes instead of endnotes.

Local and national instruments

The first time you refer to a local rule or a local policy, a national instrument, a companion policy or a national policy in a document, use the full name of the instrument and italicize the name of the document. For example, refer to:

- National Instrument 21-101 *Marketplace Operation*
- Companion Policy 21-101CP
- National Policy 47-201 *Trading Securities Using the Internet and Other Electronic Means*
- BC Policy 31-601 *Registration Requirements*

When you subsequently refer to the same rule or policy, you may use a variety of words. Use your judgment in the context and use the most appropriate term. For example, if you want to refer to National Instrument 21-101 *Marketplace Operation* again, you could use:

- national instrument
- instrument
- NI 21-101
- marketplace operation rule

Money

These are the rules for referring to money:

1. **Use figures, not words, and not figures and words, to express exact or appropriate amounts of money.**

\$8 about \$1900
\$13.75 nearly \$50,000

2. **For amounts of money from different currencies, use the abbreviation or symbol *before* the amount.**

Can \$10,000 (Canadian dollars)
US \$10,000 (US dollars)
Mex \$10,000 (Mexican pesos)
DM 10,000 (West German deutsche marks)
£ 10,000 (British pounds)
¥ 10,000 (Japanese yen)

3. **Do not add a decimal point or zeros to whole dollar amounts.**

X shares cost \$12.50; Y shares cost \$20, but they are still a better investment.

4. **In a column, if any amount contains cents, add the decimal point and two zeros to maintain a uniform appearance. Align the dollar signs to the left of the longest amount in the column.**

\$275.75	\$ 165.00
25.00	3,450.25
<u>8.20</u>	<u>98,932.00</u>
\$308.95	\$102,547.25

Note: the dollar sign appears before the *first* item and the total.

5. **Write money in round amounts of a million or more partially in words.**

\$23 million \$6.25 billion
\$10.5 million \$6,250 million

6. **Write related amounts in the same way.**

\$500,000 to \$1,000,000
not \$500,000 to \$1 million.

7. Repeat the word million (billion, etc.) with each figure to avoid misunderstanding.

\$5 million to \$10 million (*not* \$5 to \$10 million)

Numbers

These are the rules for using numbers:

1. Words or figures: over and under 10

In running text, generally write out numbers from one to nine in words; use figures for numbers 10 or greater.

The Commission issued eight orders this month. This was significantly lower than last month's 14 orders.

2. Figures don't begin sentence

Never begin a sentence with a figure: place the number elsewhere in the sentences, or spell it out.

Twenty employees of the Commission attended the training course.

or

The Commission had 20 employees attending the training session.

3. Numbers in technical writing

In technical writing and especially in tables and charts, figures are almost always preferable. In general business writing, use them when needed for greater emphasis and clarity.

4. Spelling out numbers

When writing out numbers in words, hyphenate all compound numbers between 21 and 99, even within larger numbers. Do not hyphenate other numbers.

twenty-one

thirty-six hundred

ninety-nine

5. Adjacent numbers

When two adjacent numbers are not separated by punctuation, spell one out and write the other in figures. Write out the shorter number.

two 7-drawer files

20 ten-drawer files

6. Series of numbers

- When a number beginning a sentence is followed by another related number, spell out both.

Thirty or forty jobs are at stake.

- When a series of three or more numbers appears in a sentence, express all in figures (even though some are under 10).

We had 12 applicants from Vancouver, 14 from Victoria, and 3 from Prince George.

- When **two** series of numbers referring to different things appear in a single sentence, avoid confusion by writing one series in words and the other in figures.

Two applicants scored 80 points, thirteen scored 75 points, and four scored 60.

7. Two numbers

When two related numbers appear in a sentence, one 10 or above and one below 10, write both in numbers.

The author found 7 mistakes when proofreading, but her colleague found 23.

8. Measurements

- Use figures before symbols or abbreviations for units of measurements.

15 cu ft

- Repeat the unit symbol in a range or a series.

20% - 40%
discounts of 5%, 10% and 15%

- If the unit is written out, you may write out the numbers as well; in a range or series, write the unit only once.

fifteen cubic feet
thirty miles
from 20 to 50 percent

9. Percentages

- You may write out *percent* in non-technical text.

Only 55 percent agreed.

- Do not hyphenate a percentage used as an adjective.

a 55 percent increase

- Use the % sign in technical materials or in tables. The % symbol is quick to read.

a 55% increase

10. Fractions and decimals

- Use words for common fractions in running text; use figures for mixed numbers (whole number plus a fraction).

One-half of the employees
7 3/4

- In tables or series, use figures . Do not add “*th*”.

1/2"
6/32
1/25 (**not** 1/25 th)

- Use decimals (not fractions) in technical and statistical writing and with metric and SI (International System) units.

1.75

- Insert a zero before the decimal point in numbers less than one (not dollar references).

0.25
0.0037

11. Abbreviation

Write *number* before a digit as an abbreviation (except at the beginning of a sentence).

No. 21 (singular)
Nos. 8511, 8532, and 8614
Number 39 follows.

12. Symbols

You may use the symbol # on business forms or in technical matter.

Invoice #002

13. Figures with abbreviations and symbols

Always use figures with abbreviations and symbols.

\$50 43% 2 in or2"
65¢ No. 21 5°C 200 km

14. Symbols in a series of numbers

Always repeat a symbol when used with a series of numbers.

Discounts of 5%, 10%, and 20%
but discounts of 5, 10, and 15 percent

Punctuation

There are two theories of punctuation that you may readily discount. One is “Use as little as possible”. The other is “Punctuate when you want to breathe”. Both are unhelpful.

The truth is that text is easier to read when the appropriate punctuation flags are neatly in place. Punctuation provides the directional or traffic signs for writing. If you follow the standard rules, the words will flow smoothly.

(See the *Gregg Reference Manual* for more details on punctuation.)

Colons

These are the rules for using colons:

- 1. Use a colon to separate two parts of a sentence when the second part further explains the first.**

Staff’s practice in cases of bankruptcy is clear: impose a condition of strict supervision on the registrant until the bankruptcy is discharged.

- 2. Use a colon in running text with an umbrella phrase (a noun phrase such *the following* or *these items*) to introduce a list.**

We reviewed all client accounts for the following: unsuitability of investments, excessive trading, improper use of discretion, and violation of disclosure requirements.

or

We reviewed all client accounts for:

1. unsuitability of investment
2. excessive trading
3. improper use of discretion
4. violation of disclosure requirements

Note: If the list is separated by white space with bulleted or numbered items and the items are short, no punctuation is necessary. It is also unnecessary to capitalize the items. Instead, use space to create emphasis.

Commas

These are the rules for using commas:

1. Use a comma to separate introductory units (a word, phrase or clause).

Also, the Commission wants to make sure that its documents are professional.

Under section 36(2) of the *Securities Act*, the Executive Director may only restrict a registration if the registrant has been given an opportunity to be heard.

If you wish to take advantage of that opportunity, please explain why the Executive Director should not accept staff's recommendations.

2. Use commas in pairs to enclose additional, or parenthetical, material.

The decision of the Director, Capital Markets Regulation, is based solely on available information.

I, George Truthful, agree to the described condition of registration.

3. Use commas to separate items in a series. Use a comma before the last *and* and you will never be wrong (leaving it out may confusingly merge the last two categories).

The administrative assistant's new duties include typing, filing, duplicating, and answering the phone.

Hyphens

These are the rules for using hyphens:

1. Use hyphens in compound adjectives consisting of two or more words which function as a unit and express a single thought. A compound adjective occurs *before* the noun.

an *up-to-date* review
a *long-term* investment
a *high-level* conference

an *eye-catching* annual report
non-public information
non-essential data

(Exceptions include *high school diploma* or *word processing centre*.)

but The decision was made at a *high level*.

I asked you to bring the style guide *up to date*.
This investment in bonds runs for a *long term*.

Note: When these expressions occur elsewhere in a sentence but are in inverted word order or an altered form, retain the hyphen.

The report was *eye-catching*.

2. Use a hyphen to link two figures in a continuous sequence, but do not leave a space before or after the hyphen.

on pages 318-340
in Articles I-III

3. Note that a number of adjective-noun combinations (such as *real estate*) and noun-noun combinations (such as *life insurance*) do not have a hyphen. They are well-known concepts or institutions easily grasped as a unit.

accounts payable records
income tax return
money market funds

4. When a noun-noun combination consists of two words of relatively equal rank, hyphenate them.

price-earnings ratio
air-sea search
the space-time continuum

5. Hyphenate a compound adjective consisting of a noun and an adjective before or after the noun.

capital-intensive
user-friendly
tax-exempt
year-round

but

yearlong worldwide
newsworthy industry wide

6. Hyphenate all compound adjectives which consist of an adjective + noun + *ed* ending before or after the noun.

tax-sheltered light-fingered
short-lived market-tested

7. Do not hyphenate an adverb participle combination if the adverb ends in *ly*.

a highly valued employee
a magnificently written decision

8. Insert a suspended hyphen in a series of adjectives with a common basic element shown only with the last term.

long- and short-term securities
private- and public-sector partnerships
10- and 20-year bonds
8 1/2 - by 11-inch paper

Periods

These are the rules for using periods:

1. Never end a sentence with two periods, even if the last word is an abbreviation.

We learned the rules for commas, semicolons, hyphens, and colons, etc.

2. Use periods, instead of semi-colons, to separate complete sentences in a list and start each item with a capital.

The Act also requires the following:

1. Within 90 days of each fiscal year, the Commission must prepare and submit to the minister a report for that fiscal year.
2. The minister must table the report before the Legislative Assembly as soon as practicable.
3. The report must contain specified information, including financial statements prepared in the form required by the minister.
4. The Commission must prepare financial statements under generally accepted accounting principles.

However, you may delete the period and other punctuation of sentence fragments. If the item takes two or more lines, then periods provide a more natural “look”.

The Act also requires that:

1. the Commission prepare and submit to the minister a report within 90 days of the end of each fiscal year
 2. the minister table the report at the Legislative Assembly as soon as practicable
 3. the report contain specified information, including financial statements prepared in the form required by the minister
 4. the Commission prepare financial statements under generally accepted accounting principles
- 3. When you have both sentence fragments and complete sentences in listed items, use periods for both. Use capitals only at the beginning of the complete sentences.**

The main uses of annual reports are:

1. *for historical purposes.* They provide a summary of the year's activities and results by department.
2. *for promotional purpose.* Department directors use the reports to highlight the yearly achievements of their departments.
3. *for job searching.* People seeking employment with the organization use them to become better informed about its operations.

Semicolons

These are the rules for using semicolons:

- 1. Use semicolons between two or more complete but related sentences. Never use a semicolon to separate a sentence fragment or a phrase from a complete sentence.**

During the interview, we will provide the registrant with a copy of a section 39 order; that order authorizes the examiner to conduct the examination.

(You may also substitute a period for the semicolon here.)

- 2. Use semicolons to separate items in a list only if commas already separate the listed items.**

The Commission mounted a comprehensive plain language program for staff: intensive, two-day training sessions; revisions to division precedents and

Time

These are the rules for referring to time:

1. Type the abbreviations *am* and *pm* in small letters without spaces or periods.

2. For time on the hour, do not use zeros.

We will break at 12 noon and begin at 1 pm (not 1:00 pm)

3. In tables, however, use minutes for all if at least one reference is in minutes.

Departure	Arrival
9:50 am	11:00 am
5:00 pm	10:10 pm

4. Do not use *am* or *pm* unless digits are used.

not *this am* but *this morning*

5. Use the forms *9 am* and *2:30 pm* for quick comprehension (rather than *o'clock*).

Support for Your Plain Language Writing

Support for Your Plain Language Writing

Basic references available on each floor

The Canadian Oxford Dictionary, Oxford: Oxford University Press, 1998.

Gregg Reference Manual, Fifth Canadian edition, for other more specific rules.

Plain language on the staffweb

Check the plain language page on the staffweb, for more information and tips on plain language. You will find:

- *Plain Language Style Guide*
 - Appendix A – *Sample Correspondence*
 - Appendix B – *Creating a Neutral Citation Document and Publishing it on the Website*
- Planning Guide Form – to help you design your text
- BCSC logo – for the standards on the use of the logo
- Glossary of Commission and industry terms, abbreviations, and acronyms
- Knowledge Centre references – for a current bibliography on plain language
- *Mark My Word!* – for plain language substitutes
- Mentors' corner
- Plurals of Latin-based English words
- Proofreaders' Marks
- Wordsmith's *Clarity Deskfinder* – for a plain language checklist on business writing
- Wordskills – for a plain language study exercises
- Websites on plain language

Plain language mentors

We have provided several staff members with special training to act as plain language mentors.

Mentors have been taught:

- how to elicit the context and background of a document
- how to provide positive, encouraging feedback
- how to help others with the plain language process through drafts
- to understand that there is more than one way to put documents into plain language
- to appreciate the value of collaborative writing.

We want mentors to provide regular feedback on the style guide and to make suggestions for improvement. We expect that their interactions with other staff in the writing process will uncover new and better ideas. Remember they are mentors and are there to help you with your plain language writing, not to do it for you.

Staff mentors are an additional resource available to help you communicate and create documents using plain language. Their names are posted on the staffweb and we encourage you to seek them out for help and advice.

APPENDIX A

Sample Correspondence

- Single page letter
- Multiple page letter
- Memo
- Fax cover
- Envelopes

February 22, 2002

File # (optional)
Scan # (optional)

Chris M. Yyy (Name of individual)
000 West Georgia Street
Vancouver BC V1V 1V1

Dear Chris Yyy:

Single page letter

Date the letter the day it is signed. Include the file and scan number if applicable. Set out the address so that it is not more than six lines and not less than three lines.

If you do not know the sex or marital status of the addressee, you may address the letter to the person by name (as above, without any middle initial). If you do, you may use Ms., Mrs., Miss or Mr. or, if you know the addressee well enough, you may say Dear Chris. A colon follows the salutation.

In addresses, follow Canada Post two-letter style for all Canadian provinces and US states, for example, BC (no periods), AB, MB, and etc. For further information visit the Canada Post website at www.canadapost.ca.

The *subject line* refers to the topic of the letter and is part of the body. Use single spacing for the body of the letter and double spacing between paragraphs. Do not use “Re:” to introduce the subject line.

Print all correspondence on Commission letterhead. Do not add the name of your division at the top of the letter. Instead, put it in the signature block

Yours truly,

Full name
Title
Division name

Writer's initials/typist's initials (optional)

cc: Full name
Title
Company

Document file name: G:\exec\correspondence.doc (optional)

By registered mail

Personal and confidential

February 22, 2002

File # (optional)

Scan # (optional)

Name of individual

Job title or department

Name of Company

P.O. Box 0000, Pacific Centre

000 West Georgia Street

Vancouver BC V1V 1V1

Dear Name of individual:

Multiple page letter

The Commission uses the full block letter style format. Begin every line of the letter at the left margin, unless you are including a list or quoted text.

Mailing notations tell the addressee how you sent the letter, for example, **By registered mail**, **By facsimile**, and **By courier**. Type them in **bold**.

Addressee notation

The addressee notation tells how to handle mail when you receive it. These notations include:

- Personal
- Confidential
- Please forward
- Personal and confidential

Type them in **bold** above the date of the letter at the left margin.

Name of individual
Page 2
February 22, 2002

Type the second and subsequent pages on the BCSC second page letterhead. Type the heading at the top of each page at line 06. The heading should include the individual's name or department, the page number and the date. On the second and subsequent pages, begin the body of the letter two to four lines below the heading.

Leave two spaces between the last paragraph of the letter and the complimentary closing. The complimentary closing for the Commission is *Yours truly*. Leave four to six blank lines for the signature.

Use reference initials to identify the typist and/or writer of the letter, and type them at the left margin two spaces below the last line of the signature block. Reference initials are optional.

When enclosing documents, type an enclosure notation one or two spaces below the complimentary closing at the left margin. If there is more than one enclosure, you may add the number or the names of the enclosures.

Type the copy notation at the left margin two spaces below the enclosure. The expression *cc* (carbon copy) is still used even though copies are commonly made by various methods. Use the blind copy notation, *bcc*, when extra copies of a letter are sent to another person but the addressee is not informed.

Yours truly,

Full name
Title
Division name

Writer's initials/typist's initials (optional)

Attachments (2) (number of attachments or enclosures is optional)

bcc: Full name
Title
Company

Document file name: G:\exec\correspondence.doc (optional)



British Columbia
Securities Commission

MEMORANDUM

To Name
 Title
 Division name (optional)

cc Name
 Title
 Division name (optional)

From Name
 Title
 Division name (optional)

Date Memo should be dated the day it is sent

Subject Memorandum

Type the body of the memo using single spacing. Use two spaces between paragraphs. Refer to the *Plain Language Style Guide* for information on how to prepare Commission documents.

There is no complimentary closing or salutation for a memo.

Writer's name (optional)

Writer's initials/typist's initials (optional)

Enclosure

Document file name: G:\exec\correspondence.doc (optional)

Envelopes

1. Postal codes are made up of six characters and must appear in the alpha, numeric, alpha, 1 space, numeric, alpha, numeric format (for example, V8V 1X4).
2. The postal code must be in upper case and placed two spaces to the right of the province with one space between the first three and last three characters. It is on the last line of the address, which includes

City name, 1 space, Province, 2 spaces, Postal Code in upper case.
(for example, Vancouver BC V7Y 1L2)

3. Follow Canada Post two-letter style for all Canadian provinces and US states, examples, BC (no periods), AB, SK, MB, ON. For further information, visit the Canada Post website at www.canadapost.ca (select Find a Postal Code, then Address Range Search, then download PDF of *Canadian Addressing Guide* at http://www.canadapost.ca/business/offerings/address_management/pdf/addressing_guide-e.pdf)
4. Type the name and address as it appears in the letter not lower than 3/4" from the bottom edge of the envelope and not higher than 1 3/4" from the bottom edge of the envelope.
5. Do not put any written information below the Postal Code.
6. Use BCSC envelope template. To install the template, go to Start and click on Settings, Control Panel, Add and Remove Programs, Scroll down to # 14 "BCSC envelope template and macro" and install, or the other alternative is to click on Tools, envelope and labels, envelope and print.

Creating a Neutral Citation Document and Publishing it on the Website

- Neutral citation numbering system
- Neutral citation document – creation and publication
- Rules for paragraph numbering in neutral citation document

Example 1

- Exemption Order

Example 2

- Excerpt from a decision to illustrate headings, subheadings, quoted text and references to numbered paragraphs in text

Creating a Neutral Citation Document and Publishing it on the Website

Neutral citation numbering system

When we stopped publishing the *Weekly Summary*, we adopted the neutral citation numbering system developed by the Canadian Citation Committee¹. Since then, the Commission has been recognized as a tribunal that has adopted the neutral citation system with our own unique identifier (BCSECCOM).

Under our plain language initiative, we will continue using this system for the documents that used to be published in chapters 2, 3 and 5 of the *Weekly Summary*. It is consistent with the practice of most Canadian and international courts and tribunals. The system involves numbering paragraphs systematically in a document to replace pagination that may be lost when documents are published electronically. Paragraph numbers are an easy way to locate references in the text of documents.

When we started using the neutral citation numbering system, we created a neutral citation template. As part of developing this style guide, we amended the template to conform it to the new standards we have set for documents. Use the revised neutral citation numbering template for the following documents:

1. notices of hearing
2. orders (including interim orders, cease-trade orders and exemption orders²)
3. settlement agreements
4. decisions

We have also decided to post our documents on the website in both *Notes format* and *PDF*. *PDF* will allow readers to print a document that is more visually appealing, while the *Notes format* will maintain the search capability of our website. The neutral citation numbering system will make it easier for our readers to move from one format to the other.

¹ The Canadian Citation Committee is a law-based organization composed of the [Department of Justice of Canada](#), the [Department of Justice of Quebec](#), [Canadian Judicial Council](#), the [Fonds pour la formation de chercheurs et l'aide à la recherche \(FCAR\) of Québec](#), [Federation of Law Societies of Canada](#), [Integer.actif](#) (formerly the Legal Research Network), [Canadian Association of Law Libraries](#) and [QuickLaw](#). You may view its website at <http://www.lexum.umontreal.ca/citation/en/>.

² We use the neutral citation standard for all exemption orders, but when we issue exemption orders under the mutual reliance system and we are not the principal jurisdiction, the exemption order does not need to conform to the standards set out in the *Plain Language Style Guide*.

Neutral citation document – creation and publication

Use the neutral citation template to create your document. The purpose of the template is to set out the basic formatting requirements for your document (e.g., margins, font and paragraph numbering). Here are the steps:

1. Click on *File – New – BCSC Template – Neutral Citation.dot*
2. Type in text (or paste in from source document) – adhere to all formatting procedures
3. Insert paragraphs where appropriate (see below for more details and tips on appropriate paragraph numbering)
4. If you require page numbers, insert them in the center of the footer at the bottom of the page (it is necessary to use a footer to avoid conflict with the neutral citation identifier in the header)
5. Save locally (document name is not important) if it is a “work in progress”
6. Once the document is final, print it out for signature on BCSC letterhead – this makes the document *official*. Remember when you print on letterhead, you must delete the header first, so that it will not interfere with the BCSC logo.

Once you have an *official* document, follow the additional steps set out below to assign a neutral citation identifier (citation) to the document and to trigger the publication process on the website (only certain people will be authorized to carry out these steps to ensure the integrity of the Commission’s website database):

1. When the document is *official* (i.e., signed) - Click on ***Publish to Web***
2. You will be prompted to save it twice.
 - By saving it on the first prompt, you will save it locally
 - By saving it on the second prompt, you will generate the document citation "2002 BCSECCOM ..."
3. Once you have the document citation, save the document in one of the following *sub directories*:
 - G:\PublicWeb\DD_Cto (Cease Trade Orders)
 - G:\PublicWeb\DD_Decisions
 - G:\PublicWeb\DD_ExemptOrders
 - G:\PublicWeb\DD_Noh (Notice of Hearing)
 - G:\PublicWeb\DD_Settlement (Includes Agreed Statement of Facts)
 - G:\PublicWeb\DD_TempOrders (Includes Extensions, Revocations, and Variations)

4. Next provide your e-mail password, when you are asked for it. This will trigger the publication process on the website. If you don't provide your e-mail password and click cancel instead, the web publishing team will not be notified to publish the document and it will not be put into the *Current Commission Documents Database*.
5. Finally, create a PDF version of the document by following these steps:
 - Open the document, click on the *Adobe* icon – Use *Acrobat Distiller* under the *General, Create Options – Create*
 - Once you have created the PDF document, save it in the same G:\PUBLICWEB\DD_ subdirectory
6. Do not delete documents from any of the G:\PUBLICWEB\DD_ sub-directories
7. If you need help, contact the web publishing team

Rules for paragraph numbering in neutral citation document

Follow these simple rules to number paragraphs in the neutral citation template:

How to number your text

Number each new paragraph consecutively. This applies only to text that is an integral part of the document. We have changed the paragraph numbering indicator from [para.] to ¶. It will show on the left side of the paragraph to be numbered. When referring to a numbered paragraph in text do not use the ¶ symbol. Instead continue to use the abbreviation para. If you want to refer to a listed item in text, refer to the paragraph and item numbers. For example, refer to “para. 17, item 1, above” or “para. 17, item 1 of [insert citation]”.

Headings

Do not number headings or subheadings. Although part of the original text, they are not an integral part of the text, nor are they paragraphs. *Tip:* to avoid having a paragraph number appear when you create a heading, create a soft return by pressing *shift enter*.

Lists

Minimize the use of lists in numbered paragraphs. If you must include a list under a numbered paragraph, do not use bullets. Instead, number the listed items without reference to the paragraph number. For example, if you have a list of five items under paragraph 1, list them as items 1, 2, 3, 4, 5, *not as* 1.1, 1.2, 1.3, 1.4, 1.5.

If you have only one level of numbering, do not use the multi-level numbering in the neutral citation template. Number the items manually.

If you use the multi-level numbering system when you only have one level of numbering for example, *1 to 5*, the next list in any subsequent paragraph will automatically start with the next level *6*, without reverting back to *1* for a new list and you will have to change it manually. Apparently this is a microsoft glitch that we simply have to work around.

If you want to refer to a listed item in text, refer to the paragraph and item numbers. For example, refer to “para. 17, item 1, above” or “para. 17, item 1 of [insert citation]”.

Punctuating lists

Refer to the rules in the *punctuation section* of this guide for the preferred way of punctuating lists. Use common sense. It may be appropriate in a neutral citation document to depart from these rules to ensure the legal meaning is clear.

Multi-level numbering

The neutral citation template contains a customized toolbar with multi-level numbering buttons. If you need more than one level of numbering in a numbered paragraph follow these steps:

1. Click on the following icons in the tool bar:
 - *ML 1 Style 1*, for the first level of numbering
 - *ML 2 Style (a)*, for the second level of numbering
 - *ML 3 Style (i)*, for the third level of numbering
 - *ML 4 Style (A)*, for the fourth level of numbering
2. If you use all four levels of numbering, the sequence will be as follows:
1(a)(i)(A)
3. To move from one level of numbering to another, click on the *increase indent* or *decrease indent* icons in the tool bar
4. If you want to refer to a sub-item of a multi-level numbered list, refer to “para. 17, item 1(a)(i)(A), above” or “para. 17, item 1(a)(i)(A) of [insert citation]”.

Quoted text

Quoted text should not have a paragraph number, even if it is longer than three lines and is preceded and followed by blank spaces. It is part of the preceding paragraph. If you are quoting from another document prepared using the neutral citation template, refer to the paragraph numbers of the document you are quoting from when you introduce the quote. For example, say “quoted in paras. 35-39, 45, 47-50 of [insert citation]:” if you want to quote paragraphs 35, 36, 37, 38 and 39, paragraph 45 and paragraphs 47, 48, 49 and 50 of another decision.

Appendices

Do not number paragraphs in appendices. Simply attach the appendices to the document.

Addenda and supplementary reasons

Occasionally, the Commission may issue an addendum to, or additional reasons for, a decision. Treat the addendum or additional reasons as a new document and insert paragraph numbers.

Example 1

Exemption Order

Xono Corporation

Section 76 of the *Securities Act*, RSBC 1996, c. 418

Background

- ¶ 1 Xono has applied for an exemption from the requirement to file and obtain receipts for a preliminary prospectus and prospectus in section 61 of the Act for certain intended trades.

Representations

- ¶ 2 Xono represents the following:

1. Xono is a reporting issuer under the securities legislation of British Columbia, Alberta and Ontario.
2. Xono is an electronic filer under National Instrument 13-101 *System for Electronic Document Analysis and Retrieval*.
3. The common shares of Xono are listed on the Canadian Venture Exchange Inc. and quoted in the United States on the over-the-counter bulletin board.
4.
5.

Order

- ¶ 3 Because it is not prejudicial to the public interest, the Executive Director orders under section 76 of the Act that a trade in securities of Xono is exempt from the requirements of section 61 of the Act, provided that Xono:

1. does this
2. does this
 - (a) with this extra condition
 - (b) with this extra condition
 - (c) with this extra condition
 - (i) with this sub condition

(ii) with this sub condition

(iii) with this sub condition

(A) with this sub sub condition

(B) with this sub sub condition

3. does this last thing too

¶ 4 March 19, 2002

Name
Executive Director

Example 2

This is an excerpt from a decision to illustrate headings, subheadings, quoted text and references to numbered paragraphs in text.

....

Findings and analysis

The public interest

- ¶ 5 The Supreme Court of Canada in *Committee for Equal Treatment of Asbestos Minority Shareholders vs. Ontario (Securities Commission)*, 2001 SCC 37 stated at para. 41:

However, the public interest jurisdiction of the OSC is not unlimited. Its precise nature and scope should be assessed by considering s. 127 in context. Two aspects of the public interest jurisdiction are of particular importance in this regard. First, it is important to keep in mind that the OSC's public interest jurisdiction is animated in part by both of the purposes of the Act described in s. 1.1, namely "to provide protection to investors from unfair, improper or fraudulent practices" and "to foster fair and efficient capital markets and confidence in capital markets". Therefore, in considering an order in the public interest, it is an error to focus only on the fair treatment of investors. The effect of an intervention in the public interest on capital market efficiencies and public confidence in the capital markets should also be considered.

- ¶ 6 The Supreme Court of Canada's articulation of the Commission's public interest jurisdiction in *Asbestos* was recently considered by this Commission in *Orr* 2001 BCSECCOM 1106. In para. 15 of *Orr*, the Commission confirmed that the court did "not fundamentally change the characterization of that jurisdiction as defined by the court in previous decisions".

....

General comments

These two examples illustrate how neutral citation documents will look using the General Standards for all Commission documents.

The title of the document uses title case (first letter of key words are capitalized), is centered and bolded. The first line describes the document, the second names the party and the third describes the section of the Act under which the discretionary power is exercised. There is a space between each line. Note *Securities Act* is italicised. Use 12-point font and Times New Roman serif typeface.

Comments on example 1

Para.1 shows how to use headings. Do not insert a space between the heading and the text. The heading is bolded for emphasis.

Para. 2 shows how to include and punctuate a list that uses complete sentences. Note that there is a colon and then a space before the list. The numbered list does not have its own paragraph number but is part of para. 2. The items in the list are complete sentences so you should end them with a period. Because it is a long list, you may want to leave a space between items for emphasis.

Para. 3 shows the multi-level numbering system used for lists. This has been built into the template. This is an example of a list that has items that are not complete sentences. Note that in this list there is no punctuation at the end of each item. Refer to the rules in the *punctuation section* of this guide for the preferred way of punctuating lists. It may be appropriate to depart from these rules to ensure the legal meaning of a formal document is clear. If a list is short, you may want to delete the spaces between the items.

Para. 4 shows how to refer to the date in a document. Refer to the name of the month in full, the day (in figures followed by a comma), and complete year. Do not use the word *Dated*. Do not use *Vancouver, British Columbia*. Do not put a period after the date. The signature block is four to six lines under the date, depending on where it fits on the page. Under the signatory's name, put the signatory's title.

Comments on example 2

Para. 5 shows how to use headings and subheadings. Put a space between the heading and subheading. Note there is no space between the subheading and the text. The headings and subheadings are bolded for emphasis. Headings and subheadings use sentence case (capitalize the first letter of the first word in the sentence only) as shown.

Para. 5 shows how to refer to a quote that is longer than three lines. The quoted text is introduced referring to the paragraph number used in the cited decision followed by a colon. It is indented and no quotations are used.

Para. 6 shows how to quote text that is three lines or less. It is introduced linearly in the sentence.