

Citation: 2023 BCSECCOM 369

Notice of Hearing

**Core Capital Partners Inc., Kamaldeep Thindal, Amandeep Thindal,
Yazan Al Homsy, Mani Chopra, Pardeep Luddu and
Aarun Kumar aka Aaron Rai Kumar**

(collectively, the Respondents)

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

- ¶ 1 The British Columbia Securities Commission (Commission) will hold a hearing (Hearing) at which the Executive Director will tender evidence, make submissions and apply for orders against the Respondents under sections 161, 162 and 174 of the *Securities Act*, RSBC 1996, c. 418 (the Act), based on the following facts:

Summary

1. The Respondents carried out a pump and dump scheme that created a misleading appearance of trading activity in, or an artificial price for, the securities of three reporting issuers in British Columbia. As part of the scheme, the Respondents, together and separately:
 - Concealed their control of the issuers;
 - Coordinated and caused the issuers to issue misleading news releases;
 - Arranged for misleading promotional campaigns about the issuers; and
 - Sold their shares of the issuers during the promotional periods for net proceeds of approximately \$46 million.
2. By engaging in this conduct, the Respondents contravened section 57(a) of the Act.

Background

3. Core Capital Partners Inc. (Core Capital) is a British Columbia company with its head office in Vancouver. Core Capital purports to provide merchant banking services to emerging companies and claims that it has directly raised, invested and co-invested more than \$540 million in transactions since 2005. It has never been registered under the Act.
4. Kamaldeep Thindal (K. Thindal) resides in Langley, British Columbia. He is the managing partner and sole director of Core Capital.
5. Amandeep Thindal (A. Thindal) resides in Surrey, British Columbia. He is Core Capital's CFO. A. Thindal and K. Thindal are brothers.

6. Yazan Al Homsy (Al Homsy) resides in Vancouver, British Columbia. He was Core Capital's vice-president of investments until 2017. Al Homsy continued working with Core Capital in a similar capacity after he stopped using that title in 2017.
7. Pardeep Luddu (Luddu) resides in Delta, British Columbia. He is an associate with Core Capital.
8. Aarun Kumar aka Aaron Rai Kumar (Kumar) resides in Vancouver, British Columbia. Kumar was registered under the Act as a dealing representative until January 2017, before joining Core Capital as its vice-president of corporate development.
9. Mani Chopra (Chopra) resides in West Vancouver, British Columbia. Chopra is a retired securities lawyer. Chopra participated in the scheme with the Respondents, but has no official title at Core Capital. He is Kumar's uncle.
10. K. Thindal, A. Thindal, Al Homsy, Chopra, Luddu, and Kumar engaged in the conduct in the notice of hearing individually and on behalf of Core Capital.

Misconduct

Manipulation - Reliq Health Technologies Inc.

11. Reliq Health Technologies Inc. (Reliq), formerly known as Moseda Technologies, Inc., is a healthcare technology company. It is a reporting issuer in British Columbia and its shares trade on the TSX Venture Exchange and are quoted on the over the counter markets in the United States.

The Respondents' undisclosed control

12. Starting in July 2015, the individual Respondents:
 - replaced Reliq's board of directors and CEO with nominees under their control;
 - appointed A. Thindal as Reliq's CFO, director and a bank signatory; and
 - accumulated a large share position in Reliq personally, as well as through the accounts of their relatives, corporations and nominees.
13. As of September 5, 2017, the Respondents personally, as well as through the accounts of their relatives, corporations and nominees, held approximately 25% of Reliq's 68,435,706 free-trading issued and outstanding shares.

Promotional Activities

14. Between August 1, 2017 and October 31, 2018 (Reliq promotional period):
 - a) the Respondents caused Reliq to:
 - i. issue misleading news releases;

- ii. issue misleading investor presentations; and
 - iii. pay for misleading promotional campaigns that they arranged;
- b) the Respondents also paid for some of the misleading promotional campaigns with their own funds; and
- c) Al Homsy issued highly promotional tweets about Reliq using the Twitter account @MakingMoneyNow1.
15. Core Capital assisted Reliq with fundraising through private placements during the Reliq promotional period. The promotional campaigns referred to the private placements as evidence of strong demand for Reliq’s shares.

Misleading news releases

16. Between October 2017 and January 2018, Reliq issued news releases announcing increases to the number of paid subscribers with Texas healthcare entities using its patient monitoring platform and the associated recurring monthly revenue as follows:

Date of announcement	Number of paid subscribers	Recurring monthly revenue (USD)
October 5, 2017	1,000	\$50,000
November 16, 2017	2,000	\$100,000
November 30, 2017	4,000	\$200,000
January 11, 2018	6,000	\$300,000

17. These news releases were misleading because they overstated the amount of recurring monthly revenue due to revenue that was either not collectable, or not collectable in a timely way.
18. On January 11, 2018, Reliq issued a news release announcing that it had “achieved profitability” as of December 2017. This news release was false and misleading as Reliq had not achieved profitability as of that date. In fact, Reliq would never achieve profitability during the Reliq promotional period.
19. On March 29, 2018, Reliq issued a news release announcing that it now had 12,000 patients enrolled in its patient monitoring platform and that it was adding at least 2,000 new patients per month. It did so knowing that investors would equate every additional 1,000 patients enrolled with 1,000 paid subscribers and \$50,000 in recurring monthly revenue (\$50 per patient/month). That made the news release misleading because it overstated the amount of recurring monthly revenue due to revenue that was either not collectable, or not collectable in a timely way.

20. Reliq issued similarly misleading news releases on April 5, 2018 announcing 5,000 new patients, and on June 13, 2018 announcing up to 5,000 additional patients.
21. On October 16, 2018, Reliq issued a news release admitting that it planned to restate its financial statements for the quarter ended March 31, 2018, due to the timing and certainty of receiving revenue invoiced to clients being “substantially unclear”.
22. Reliq reported about \$2 million in revenue from its patient monitoring platform during the Reliq Promotional Period. In fact, it only collected \$51,540 or about 2.6% of that amount.

Misleading investor presentations

23. The investor presentations were misleading as they repeated the misleading aspects of the news releases. They also described the educational credentials and business experience of Reliq’s registered officers and directors in promotional terms without disclosing the Respondents’ secret control of the company.

Misleading promotional campaigns

24. Reliq was the subject of paid promotional campaigns, arranged for by some of the Respondents. The promotional campaigns touted the company in advertorials on various websites, in promotional posts, newsletters, reports and in email blasts. The promotional campaigns repeated the claims in Reliq’s misleading news releases and included the following highly promotional claims about Reliq:

- “One of the most attractive and undervalued investment opportunities”;
- “Reliq has been executing flawlessly...”;
- “A best-in-class opportunity”; and
- “This healthcare technology company is quickly becoming a free cashflow machine.”

25. The Reliq promotional campaigns were also misleading as they did not inform investors that Reliq was overstating its revenue, was not profitable and was secretly controlled by the Respondents.

Misleading Tweets

26. Al Homsy promoted Reliq in hundreds of tweets on his Twitter account, @MakingMoneyNow1. His tweets repeated claims from the misleading news releases and the misleading promotional campaigns, and also made highly promotional statements including:
 - Reliq was “officially a 20 bagger and counting”;
 - “I really believe @ReliqHealth will be that billion dollar company that people will talk about years to come”; and

- “This stock isn’t even real life lol. #Beast \$RHT.TO”.

27. These tweets were misleading as they failed to include the true financial circumstances of Reliq and that Reliq was secretly controlled by the Respondents, including Al Homsy.

Increase in share price and trading volume during Reliq promotional period

28. In the month before the Reliq promotional period, Reliq’s shares were thinly-traded. On July 31, 2017, Reliq’s share price closed at \$0.105.

29. The misleading news releases, investor presentations, promotional campaigns and tweets, and Reliq’s fundraising activities, resulted in or contributed to an increase of Reliq’s share price during the Reliq promotional period. On February 12, 2018, Reliq’s share price closed above \$2.00 for the first time.

30. Reliq’s share price reached a high of \$2.62 on March 1, 2018. This represented an increase in share price of about 2,000% since the start of the Reliq promotional period and gave Reliq a market capitalization of approximately \$270 million despite being an unprofitable company.

31. During the Reliq promotional period, 518,180,016 Reliq shares traded. The year before the Reliq promotional period, 104,433,052 Reliq shares traded.

32. After the Reliq Promotional Period ended, Reliq’s share price dropped rapidly, closing at \$0.355 by the end of 2018.

The Respondents’ sold their Reliq shares

33. The Respondents dumped approximately 23 million Reliq shares throughout the Reliq promotional period for net proceeds of approximately \$20 million, as follows:

- a) K. Thindal sold over 7.6 million shares for net proceeds of over \$7.7 million;
- b) Al Homsy sold over 8.1 million shares for net proceeds of over \$7.7 million;
- c) Luddu sold almost 1.9 million shares for net proceeds of over \$810,000; and
- d) Kumar sold over 5.5 million shares for net proceeds of over \$3.2 million.

Manipulation - Block One Capital Inc.

34. Block One Capital Inc. (Block One), formerly Essex Angel Capital Inc. (Essex Angel), and now known as AI Artificial Intelligence Ventures Inc., was an investment issuer based in Vancouver, British Columbia.

35. In November 2017, the Respondents caused Essex Angel to change its name to Block One and announce it was expanding into the blockchain sector. Block One was a reporting issuer in British Columbia and its shares traded on the TSX

Venture Exchange and was quoted on the over the counter markets in the United States.

The Respondents' undisclosed control

36. From at least 2014 onwards, the Respondents accumulated a large share position in Block One, personally, as well as through the accounts of their relatives, corporations and nominees. As of March 6, 2017, Kumar, A. Thindal, Chopra and Chopra's relatives secretly held over 24% of Block One's 37,588,333 issued and outstanding shares.
37. The Respondents also installed nominees as officers and directors of Block One, who followed the Respondents' instructions with respect to the company. In addition to nominees, A. Thindal was appointed as officer and director of Block One in March 2018, and was a bank signatory.

Promotional activities

38. Between November 6, 2017 and September 5, 2018 (Block One promotional period):
- a) the Respondents caused Block One to:
 - i. enter into business transactions;
 - ii. issue misleading news releases about the business transactions that could be used in promotional campaigns;
 - iii. issue misleading investor presentations; and
 - iv. pay for misleading promotional campaigns that they arranged;
 - b) the Respondents also paid for some of the promotional campaigns with their own funds;
 - c) the Respondents' trading of Block One's shares dominated the market during certain periods; and
 - d) Al Homsy issued highly promotional tweets about Block One using the Twitter account @MakingMoneyNow1.
39. Core Capital assisted Block One with fundraising through private placements during the Block One promotional period. The promotional campaigns referred to the private placements as evidence of strong demand for Block One's shares. Some of the Respondents participated in the private placements to increase their shareholdings of Block One.

Misleading news releases

40. In a news release dated November 30, 2017, Block One announced that it had signed a binding term sheet to acquire up to 90% of TG12 Ventures Inc. (TG12 Ventures), a company engaged in cryptocurrency mining, for USD \$2.3 million. The news release stated that TG12 Ventures had entered into an agreement to acquire 1,000 cryptocurrency miners (cryptocurrency miner agreement). Block One was scheduled to acquire a 40% interest in TG12 Ventures immediately for USD \$250,000. Block One estimated that TG12 Ventures would have annual revenue of USD \$7.8 million when the miners were fully operable.
41. The November 30, 2017 news release was false and misleading as it failed to include relevant information including:
- a) TG12 Ventures had been incorporated by the Respondents two weeks earlier and was not engaged in cryptocurrency mining;
 - b) TG12 Ventures had no funds to pay for the miners under the cryptocurrency miner agreement;
 - c) The Respondents, and not TG12 Ventures, had paid for TG12 Ventures' first payment owed under the cryptocurrency miner agreement; and
 - d) Block One's acquisition of up to 90% of TG12 Ventures was not an arm's length transaction as the Respondents controlled both Block One and TG12 Ventures.
42. In a news release dated December 7, 2017, Block One announced that TG12 Ventures was doubling the amount of miners it was purchasing to 2,000 cryptocurrency miners. This news release was misleading as TG12 Ventures had no funds to pay for any miners.
43. In a news release dated January 3, 2018, Block One announced that it had entered into a binding agreement with TG12 Ventures, a newly formed private arm's length British Columbia company, to acquire 90% of TG12 Ventures' issued and outstanding shares for USD \$2.91 million. Block One added that TG12 Ventures had advanced the USD \$2.91 million as a deposit for the initial 1,000 miners and would be required to advance a further USD \$3 million to complete the purchase of the remaining 1,000 miners.
44. The January 3, 2018 news release was misleading because:
- a) Block One had, in fact, paid TG12 Ventures the equivalent of USD \$2.681 million so TG12 Ventures could make its remaining payments to acquire the

- original 1,000 miners under the cryptocurrency miner agreement. TG12 Ventures had no funds to pay for any miners otherwise;
- b) The binding agreement stated that Block One would only acquire 45% of TG12 Ventures for USD \$2.91 million, not 90%; and
 - c) TG12 Ventures was controlled by the Respondents and was not an arm's length company.
45. In a news release dated March 14, 2018, Block One announced that TG12 Ventures had commenced mining Bitcoin and had begun generating revenue. This news release was false and misleading as Block One had not begun generating revenue from mining Bitcoin as of that date. In fact, Block One did not generate revenue from mining any cryptocurrency currency during the Block One promotional period.
46. In a news release dated May 8, 2018, Block One announced that it had completed the sale of its Bitcoin mining operations to another company for \$3.115 million in shares. This was false and misleading as Block One had no Bitcoin mining operations to sell.

Misleading investor presentations

47. The investor presentations were misleading as they repeated the misleading aspects of the news releases. They also described the educational credentials and business experience of Block One's registered officers and directors in promotional terms without disclosing the Respondents' secret control of the company.

Misleading promotional campaigns

48. Block One was the subject of paid promotional campaigns arranged by some of the Respondents. The promotional campaigns touted the company in advertorials on various websites, in promotional posts, newsletters, reports and in email blasts. The promotional campaigns repeated the misleading claims in Block One's news releases and included the following highly promotional claims about Block One:
- "The time for waiting is over!";
 - "[Block One] has investors racing for a seat at the table";
 - "real, big things on the near-term horizon";
 - "The strength of leadership goes without saying when it comes to Block One's management";
 - "[Block One] is making the move to revolutionize the blockchain market"; and
 - "Block One has become a leading company to spearhead the evolution of this new technology as we know it!".

49. The Block One promotional campaigns were also misleading as they omitted to include that Block One did not generate any revenue from its cryptocurrency mining company, which was controlled by the Respondents.
50. For the year ended August 31, 2018, Block One did not generate any revenue from its cryptocurrency mining investment and lost over \$10 million.

Misleading Tweets

51. Al Homsy promoted Block One in hundreds of tweets on his Twitter account, @MakingMoneyNow1. His tweets repeated claims from the misleading news releases and the misleading promotional claims, as well as making highly promotional statements including:
 - Block One was “your next 10 bagger”;
 - “a billion dollar company in the next 12-24 months (yes a billion)”;
 - “\$36.5 Million in revenue and \$33.5 Million in net only from the crypto investment”.
52. These tweets were misleading as they failed to include the true financial circumstances of Block One or that Block One was secretly controlled by the Respondents, including Al Homsy.

Increase in share price and trading volume during Block One promotional period

53. Prior to the Block One promotional period, Block One’s shares were thinly-traded, with a share price of \$0.24 on November 3, 2017.
54. Block One’s trading volume increased from an average of zero on the market between September 12 to October 11, 2017 to 3,412,186 on December 5, 2017. During the Block One promotional period, 107,033,284 Block One shares traded. The year before the Block One promotional period, 3,054,015 Block One shares traded.
55. The misleading news releases, investor presentations, promotional campaigns, tweets and Block One’s fundraising activities, resulted in or contributed to an increase of Block One’s share price during the Block One promotional period. Block One’s share price reached a high of \$1.85 on December 5, 2017, a 671% increase from its share price of \$0.24 on November 3, 2017. This gave Block One a market capitalization of approximately \$81 million despite being an unprofitable company.
56. After the Block One promotional period ended, Block One’s share price dropped rapidly, closing at \$0.13 by the end of 2018.

The Respondents sold their Block One shares

57. During the Block One promotional period, the Respondents dumped approximately 13 million shares for net proceeds of approximately \$7.6 million as follows:
- a) K. Thindal sold over 5.5 million shares for net proceeds of over \$4.4 million;
 - b) Al Homsy sold over 3.8 million shares for net proceeds of over \$911,000;
 - c) A. Thindal sold 982,500 shares for net proceeds of roughly \$1 million;
 - d) Luddu sold 743,400 shares for net proceeds of over \$126,000;
 - e) Kumar sold over 2 million shares for net proceeds of over \$1.1 million; and
 - f) Chopra sold 82,500 shares for net proceeds of over \$13,000.

Manipulation - Integrated Cannabis Company, Inc.

58. CNRP Mining Inc., now known as LEEF Brands Inc., was a mining company based in Vancouver, British Columbia. It was a reporting issuer in British Columbia and its shares traded on the Canadian Securities Exchange and were quoted on the over the counter markets in the United States. On June 6, 2018, the Respondents caused CNRP Mining Inc. to change its name to Integrated Cannabis Company, Inc. (Integrated).

The Respondents' undisclosed control

59. The Respondents accumulated a large share position in Integrated starting in February 2017, when it secretly gained control of 60% of Integrated's 14,050,000 issued and outstanding shares. The Respondents installed nominees as directors and officers of Integrated, including Kumar's brother, who was also a bank signatory. The directors and officers followed the Respondents' instructions with respect to the company. A. Thindal was also a bank signatory for Integrated.
60. As of June 18, 2018, the Respondents, personally, as well as through the accounts of their relatives, corporations and nominees, secretly held approximately 49% of Integrated's 36,023,786 issued and outstanding shares.

Promotional activities

61. Between July 21, 2017 and March 9, 2019 (Integrated promotional period):
- a) The Respondents caused Integrated to:
 - i. enter into business transactions;
 - ii. issue misleading news releases about the business transactions that were referred to in promotional campaigns;
 - iii. issue misleading investor presentations; and
 - iv. pay for misleading promotional campaigns that they arranged;
 - b) the Respondents also paid for or directed others to pay for some of the promotional campaigns they arranged; and

- c) the Respondents' trades in Integrated's shares dominated the market for certain periods.
62. Core Capital assisted Integrated with fundraising through private placements during the Integrated promotional period. The promotional campaigns referred to the private placements as evidence of strong demand for Integrated's shares. Some of the Respondents participated in the private placements to increase their shareholdings of Integrated.

Misleading news releases

63. On July 21, 2017, Integrated announced that it had entered into a letter of intent to acquire all of the shares of 1127466 B.C. Ltd. (numbered company), which held a world-wide exclusive licence for X-Sprays through a wholly owned subsidiary. Integrated also announced a \$3 million private placement.
64. The July 21, 2017 news release was false and misleading as it failed to include the following relevant information:
- a) The Respondents caused a nominee to incorporate the numbered company the day before the news release;
 - b) Neither the numbered company nor its subsidiary had any licencing rights for X-Sprays; and
 - c) Integrated's acquisition of the numbered company was not an arm's length transaction as the Respondents controlled the numbered company and Integrated.
65. On September 6, 2017, Integrated announced that it had completed business and financial diligence on the numbered company and its assets, and was ready to move forward with the transaction.
66. This news release was misleading as it failed to include the following relevant information:
- a) The numbered company's wholly owned subsidiary had obtained a licence for X-Sprays, the numbered company's key asset, just two weeks earlier for only \$10; and
 - b) The licencing agreement was not an arm's length transaction.

67. On June 4, 2018, Integrated announced that it had completed its acquisition of the numbered company. This news release was misleading as it failed to include the relevant information that the acquisition was not an arm's length transaction as the Respondents controlled Integrated and the numbered company.
68. On Sept 27, 2018, Integrated announced that it had signed an agreement with GTEC Holdings Ltd. (GTEC) to collaborate on X-Sprays products for the Canadian market. This news release was misleading as it failed to include the relevant information that K. Thindal was a director of GTEC and, therefore, it was not an arm's length transaction. Integrated's share price closed 20% higher the next day.

Misleading investor presentations

69. The investor presentations were misleading as they repeated the misleading aspects of the news releases. They also described the educational credentials and business experience of Integrated's registered officers and directors in promotional terms without disclosing the Respondents' secret control of the company.

Misleading promotional campaigns

70. Integrated was the subject of paid promotional campaigns arranged for by some of the Respondents. The promotional campaigns touted the company in advertorials on various websites, in promotional posts, newsletters, reports and in email blasts. The promotional campaigns repeated the misleading claims in its news releases and included the following highly promotional claims about Integrated:

- "A Stock You Cannot Miss";
- "This Pot Stock Just Keep Going";
- "Marijuana stocks become a top priority on Wall Street: One Stands Out";
- "A direct line to immediate revenue? One Company could be on the verge of something BIG!"; and
- "[Integrated] is one of the key players in the marijuana industry".

71. Integrated's promotional campaigns were also misleading as they omitted to include that Integrated was never profitable during the Integrated promotional period and was controlled by the Respondents.

Increase in share price and trading volume during Integrated promotional period

72. As of January 2017, Integrated was thinly-traded, with a share price at or below \$0.05.
73. In the month before the July 21, 2017 news release, Integrated's trading volume had a total of 16,632 shares. On July 21, 2017, Integrated traded 1,270,672 shares and K. Thindal, Chopra and Luddu accounted for over 80% of the trading volume.

74. The misleading news releases, investor presentations, promotional campaigns and tweets, and Integrated's fundraising activities, resulted in or contributed to an increase of Integrated's share price during the Integrated promotional period. Integrated's share price increased from a low of \$0.40 on July 21, 2017 to a high of \$2.02 on October 16, 2018. This was an increase of 405%, giving Integrated a market capitalization of approximately \$73 million despite being an unprofitable company.
75. During the Integrated promotional period, 85,232,224 Integrated shares traded. The year before the Integrated promotional period, 4,969,762 Integrated shares traded.
76. After the Integrated promotional period ended, Integrated's share price dropped rapidly, closing at \$0.285 on March 11, 2019.

The Respondents sold their Integrated shares

77. During the Integrated promotional period, the Respondents dumped approximately 20 million shares for net proceeds of approximately \$19 million, as follows:
 - a) K. Thindal sold over 9.2 million shares for net proceeds of roughly \$10 million;
 - b) Al Homsy sold over 3.7 million shares for net proceeds of almost \$2.8 million;
 - c) A. Thindal sold 3.1 million shares for net proceeds of over \$3.4 million;
 - d) Luddu sold over 1 million shares for net proceeds of over \$736,000;
 - e) Kumar sold almost 1.3 million shares for net proceeds of roughly \$748,000; and
 - f) Chopra sold over 1.9 million shares for net proceeds of over \$1.1 million.

Total net trading proceeds

78. The Respondents' total net trading proceeds during the Reliq, Block One and Integrated promotional periods were over \$46 million. The total net trading proceeds for each individual Respondent is as follows:
 - a) K. Thindal - \$22.25 million;
 - b) Al Homsy - \$11.41 million;
 - c) A. Thindal - \$4.49 million;
 - d) Luddu - \$1.67 million;
 - e) Kumar - \$5.14 million; and
 - f) Chopra - \$1.20 million.

Contraventions of the Act

79. By engaging in the conduct set out in this notice of hearing, the Respondents directly or indirectly, engaged in or participated in conduct relating to the securities of Reliq, Block One and Integrated that they knew, or reasonably should have

known, resulted in or contributed to a misleading appearance of trading activity in, or an artificial price for, a security or exchange contract, contrary to section 57(a) of the Act.

80. While they were directors, officers, employees or agents of Core Capital, K. Thindal, A. Thindal, Al Homsy, Chopra, Luddu and Kumar authorized, permitted or acquiesced in Core Capital's contraventions of section 57(a) and therefore, by operation of section 168.2 of the Act, they also contravened the same provision.

Hearing Process

- ¶ 2 The Respondents or their counsel are required to attend at the 12th Floor Hearing Room, 701 West Georgia Street, Vancouver, British Columbia, on **Thursday, October 12, 2023, at 9:00 a.m.** if they wish to be heard before the Commission sets a date for the Hearing. Relevant information gathered by Commission Staff in the investigation of this matter will be disclosed to the Respondents upon request to the Executive Director.
- ¶ 3 At the Hearing, the Respondents may be represented by counsel, make submissions and tender evidence. The Respondents are requested to advise the Commission of their intention to attend the Hearing by informing the Hearing Office at PO Box 10142, Pacific Centre, 701 West Georgia Street, Vancouver, BC V7Y 1L2 phone: (604) 899-6500; email: hearingoffice@bcsc.bc.ca.
- ¶ 4 If the Respondents or their counsel do not appear at the Hearing, the Executive Director may apply to have questions of liability and sanction heard at the same time. Determinations adverse to the Respondents may be made in their absence.
- ¶ 5 Orders made against the Respondents in this matter may automatically take effect against them in other Canadian jurisdictions, without further notice to the Respondents.

Peter J. Brady
Jul 21 2023 2:13 PM -07:00

- ¶ 6 Peter J. Brady
Executive Director