BC Securities Commission
Invest Right

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Citation: 2026 BCSECCOM 355

Notice of Hearing

Graham Leslie Harris

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 Graham Leslie Harris under sections 161, 162 and 174 of the *Securities Act*, RSBC 1996, c. 418 (the Act), based on the following facts:

Summary

1. Graham Leslie Harris (Harris), the chairman and a director of Surge Battery Metals Inc. (Surge), engaged in insider trading when he traded shares in Surge during a trading blackout.

Background

2. Surge is a British Columbia reporting issuer. At all relevant times, it purported to be a mineral exploration company focusing on exploration for lithium. At the time, Surge's main asset was an exploratory mineral claims site in the United States.

3. Harris became a director of Surge on April 21, 2023. On June 6, 2023, Surge announced that Harris had been appointed chair of the board of directors.

4. On September 4, 2023, at 2:01 PM, Surge's head geologist emailed Harris and others with positive preliminary results from a drillhole called hole NN2301 at Surge's exploratory site.

5. Just over two hours later, at 4:16 PM, Harris emailed Surge's corporate secretary advising that the company was in receipt of material information, and asking the corporate secretary to issue a company blackout to all directors and employees.

6. At 4:38 PM, the corporate secretary emailed Harris together with the other directors and staff advising that the company was placing a blackout on any insiders trading in its stock as the company was in receipt of material information.

7. The next day, on September 5, 2023, Harris began selling his family's Surge shares.

8. On September 12, 2023, Surge issued a news release entitled "Surge Announces Highest Grade Lithium Assays to Date with up to 8070 ppm Lithium in the First 2023

Hole at [the exploratory site]". The news release set out the results from hole NN2301.

9. The blackout was lifted on September 12, 2023.

Misconduct

10. As chairman and a director of Surge, Harris was in a special relationship with Surge.

11. The information about the results from hole NN2301 was material information. It was not generally disclosed until the September 12, 2023 news release was published.

12. Between learning about the results from hole NN2301 on September 4 and the publication of the news release on September 12, Harris sold 459,600 Surge shares for proceeds of $460,564. He made the transactions in accounts in the names of four family members.

13. By trading shares of Surge while in possession of material information that had not been generally disclosed, Harris engaged in insider trading contrary to section 57.2(2) of the Act.

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 **Tuesday, December 15, 2026, 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 Respondent upon request to the Executive Director.

¶ 3 At the Hearing, the Respondent may be represented by counsel, make submissions and tender evidence. The Respondent is requested to advise the Commission of his 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 Respondent or his 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 Respondent may be made in his absence.

Peter J Brady
11/3/2026 | 8:43 AM MST

¶ 5 Peter J. Brady
Executive Director