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File Number: 145191

August 21, 2023

BY COURIER AND EMAIL: COMMSEC@BCSC.BC.CA

British Columbia Securities Commission
12th Floor - 701 West Georgia Street
Vancouver, BC V7Y 1L2

Attention: Commission Hearing Office

Dear Hearing Officer:

**Re: Review of Decision of Canadian Investment Regulatory Organization (“CIRO”) made
July 23, 2023 in the matter of The Investment Dealer and Partially Consolidated Rules
and Dominic Spooner**

We act as counsel for Dominic Spooner.

We write pursuant to sections 28 and 165 of the Securities Act, R.S.B.C. 1996, c. 418 and Part 7 of BC Policy 15-601. Mr. Spooner applies for a hearing and review of the decision of the Canadian Investment Regulatory Organization made July 23, 2023 in the matter of the Investment Dealer and Partially Consolidated Rules and Dominic Spooner (the “Decision”). A copy of the Decision is enclosed.

Mr. Spooner is the subject of the Decision and is clearly a person affected by it.

Without intending to limit the grounds for review that Mr. Spooner will rely on in this hearing – all of which will be further detailed in his Statement of Points, for now Mr. Spooner in general terms identifies the following grounds for review:

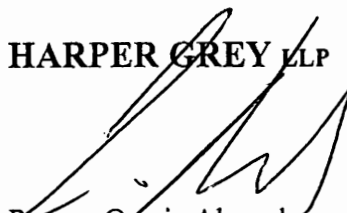
1. The sanctions ordered by the CIRO hearing panel are unduly harsh and not proportionate to the conduct admitted to by Mr. Spooner in the agreed statement of facts entered into between Mr. Spooner and Staff of CIRO;
2. The hearing panel made unreasonable factual findings based on the limited evidence that it did hear at the hearing;
3. The Decision was unreasonable;
4. The CIRO hearing panel erred in law; and

5. Such further and other grounds as counsel may advise.

We respectfully request that the Commission schedule a pre-hearing conference to discuss, *inter alia*, a time schedule for delivery of the record by CIRO and the delivery of written submissions by the parties.

Yours truly,

HARPER GREY LLP


Per: Owais Ahmed
*Personal Law Corporation

OZA/cxl

cc: Sandra Poree, National Hearing Officer, CIRO (via email)
Counsel for CIRO Staff, Lorne Herlin (via email)
Executive Director of the BC Securities Commission (via email)