From: Chuck Higgins < chiggins@pilotlaw.ca>

Sent: February 7, 2022 9:03 PM

To: Rob Cook < rob.cook@thecse.com>

Cc: Market Regulation < marketregulation@osc.gov.on.ca>

Subject: RE: CSE rule proposal

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Rob:

I've had a look at the proposals. No comments on the NV listings.

On the venture issuer side, I really think that the CSE works well for capital raising for junior mining companies. I say this from much experience with the CSE and its predecessors since the turn of the century! Much better for all if the money goes into the ground instead of paying lawyers and regulators.

So I would not be in favour of any measures which restrict the access to capital or increase the costs of running a public company on the CSE. I would therefore be against any proposal which:

- require more frequent shareholder approvals than required by corporate or securities law;
- increase the Exchange's review and approval of corporate matters, which in my view are best left to the directors and officers of the listed companies; or
- implement more onerous listing requirements, as this will increase the cost of capital to the issuers since private capital is invariably more expensive than public capital.

As requested, I have copied the OSC with my comments.

Thanks very much

Chuck



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