

The Ontario Securities Commission

# OSC Bulletin

February 7, 2019

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The Ontario Securities Commission administers the *Securities Act* of Ontario (R.S.O. 1990, c. S.5) and the *Commodity Futures Act* of Ontario (R.S.O. 1990, c. C.20)

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## Notices / News Releases

### 1.1 Notices

#### 1.1.1 CSA Staff Notice 45-325 Filing Requirement and Fee Payable for Exempt Distributions Involving Fully Managed Accounts



Canadian Securities  
Administrators

Autorités canadiennes  
en valeurs mobilières

### CSA Staff Notice 45-325 *Filing Requirement and Fee Payable for Exempt Distributions Involving Fully Managed Accounts*

February 7, 2019

#### Purpose

This notice is intended to clarify when Form 45-106F1 *Report of Exempt Distribution* (**Form 45-106F1**) of National Instrument 45-106 *Prospectus Exemptions* (**NI 45-106**) is required to be filed, and fees paid, for exempt distributions involving fully managed accounts.

#### Background

In 2016, the Canadian Securities Administrators (the **CSA**) introduced a streamlined and harmonized version of Form 45-106F1 as part of an effort to reduce the compliance burden for issuers and underwriters distributing securities under prospectus exemptions, while ensuring Form 45-106F1 continues to provide securities regulators with the necessary information to facilitate more effective regulatory oversight of the exempt market and improve analysis for policy development purposes.

Among other changes made, the reporting of exempt distributions involving fully managed accounts was simplified to reduce regulatory burden on issuers and underwriters. In all jurisdictions, Form 45-106F1 only requires issuers and underwriters to provide information on the trust company, trust corporation or registered adviser who had purchased securities on behalf of a fully managed account in item 7 and Schedule 1 and no longer requires information about the beneficial owners of the fully managed account.

While Form 45-106F1 has been harmonized, the requirement to file and pay filing fees for Form 45-106F1 continues to be governed by the securities legislation of each CSA jurisdiction.

#### Reporting requirement for exempt distributions involving fully managed accounts

Issuers and underwriters who rely on the accredited investor prospectus exemption (the **AI Exemption**) in section 2.3 of NI 45-106 to distribute securities are required to file a Form 45-106F1 within a prescribed timeframe.<sup>1</sup> An accredited investor includes:

- a trust company or trust corporation registered or authorized to carry on business under the *Trust and Loan Companies Act* (Canada) or under comparable legislation in a jurisdiction of Canada or a foreign jurisdiction, acting on behalf of a fully managed account managed by the trust company or trust corporation;<sup>2</sup> and
- a person acting on behalf of a fully managed account managed by that person, if that person is registered or authorized to carry on business as an adviser or the equivalent under the securities legislation of a jurisdiction of Canada or a foreign issuer.<sup>3</sup>

Section 2.3(2) of NI 45-106 states that for the purpose of the AI Exemption, a trust company or trust corporation described in paragraph (p) of the definition of “accredited investor” in section 1.1 of NI 45-106 is deemed to be purchasing as principal.

<sup>1</sup> In Ontario, the accredited investor exemption is set out under subsection 73.3(2) of the *Securities Act* (Ontario).

<sup>2</sup> See paragraph (p) of the definition of “accredited investor” in section 1.1 of NI 45-106.

<sup>3</sup> See paragraph (q) of the definition of “accredited investor” in section 1.1 of NI 45-106.

Similarly, section 2.3(4) of NI 45-106 states that for the purpose of the AI Exemption, a person described in paragraph (q) of the definition of “accredited investor” in section 1.1 of NI 45-106 is deemed to be purchasing as principal. Instruction 4 of Form 45-106F1 requires issuers and underwriters to provide information on the trust company, trust corporation or registered adviser who had purchased securities on behalf of a fully managed account and not the beneficial owners of the fully managed account.

### Filing and Fee Requirements

In accordance with Instruction 1 of Form 45-106F1, if a distribution is made in more than one jurisdiction of Canada, the issuer may complete a single Form 45-106F1 and file it in each jurisdiction of Canada in which the distribution occurs. In order to determine the fee payable in each jurisdiction, please refer to Annex A.

In each jurisdiction other than Manitoba, Québec and Saskatchewan, the requirement to file Form 45-106F1 in respect of a distribution involving a fully managed account is based on the location of the trust company, trust corporation or registered adviser deemed to be purchasing the securities as principal in accordance with section 2.3(2) or 2.3(4) of NI 45-106, as applicable. The requirement to pay a fee in these jurisdictions is triggered by the requirement to file Form 45-106F1. Accordingly, there is no requirement to file Form 45-106F1 or to pay a fee in these jurisdictions based on the location of the beneficial owner of a fully managed account.

In Manitoba and Québec, the requirements to file Form 45-106F1 and pay fees are based on the location of the beneficial owner of a fully managed account. A Form 45-106F1 is not required to be filed in these jurisdictions if only the trust company, trust corporation or registered adviser who had purchased securities on behalf of a fully managed account is located in the jurisdiction and there are no beneficial owners in the jurisdiction. Because Form 45-106F1 does not require issuers to provide information on the beneficial owners of fully managed accounts, the regulators in these jurisdictions require that issuers file an accompanying letter with the Form 45-106F1 stating the gross value of securities distributed to beneficial owners located in those jurisdictions.

In Saskatchewan, the requirement to file Form 45-106F1 and pay a fee is based on the location of the distribution. This could mean that the form should be filed in Saskatchewan if the trust company, trust corporation or registered adviser who had purchased securities on behalf of a fully managed account and/or the beneficial owner of a fully managed account is located in Saskatchewan. The Financial and Consumer Affairs Authority of Saskatchewan has issued blanket relief to waive the filing requirements in respect of a distribution to the beneficial owner of a fully managed account where the trust company, trust corporation or registered adviser who had purchased securities on behalf of a fully managed account is not located in Saskatchewan. As no filing will be required in these cases, no fee is triggered.

### Questions

Please refer your questions to any of the following:

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**Annex A – Fee payable in each jurisdiction**

**How to determine the fee payable in each jurisdiction**

- **In Alberta:** Please refer to Alberta Securities Commission Rule 13-501 *Fees* sec.11.
- **In British Columbia:** Please refer to *Securities Regulation*, B.C. Reg. 196/97, sec. 22, item 16(1).
- **In Manitoba:** Please refer to s.1(2)(z), Schedule A, of the *Securities Regulation* 491/88R.
- **In New Brunswick:** Please refer to sections 2.5 and 2.19 of Local Rule 11-501.
- **In Newfoundland and Labrador:** Please refer to section 7(2) of the fee schedule approved by s. 143 of the *Securities Act*.
- **In Nova Scotia:** Please refer to section 24, Appendix A, of Rule 11-508.
- **In Northwest Territories:** Please refer to *Securities Fees Regulations* R-066-2008 as amended, Schedule, Paragraph 1(p).
- **In Nunavut:** Please refer to Local Rule 31-504, Schedule A, Item (p).
- **In Ontario:** Please refer to Ontario Securities Commission Rule 13-502 *Fees*, Appendix C, Row B2.
- **In Prince Edward Island:** Please refer to the Schedule to the *Securities Act*.
- **In Québec:** Please refer to section 267(4) of *Securities Regulation*, CQLR, chapter V-1.1, r. 50. Fees are payable on the gross value of the securities distributed to beneficial owners located in Quebec.
- **In Saskatchewan:** Please refer to Appendix A – Table 1, s. 4(c) of *The Securities Regulations*.
- **In Yukon:** Please refer to *Securities Fee Regulation*, (O.I.C. 2009/66), Schedule 1, para. 1(p).



**1.1.2 Notice of Ministerial Approval of Arrangements Regarding the Access, Collection, Storage and Use of Derivatives Data**

**NOTICE OF MINISTERIAL APPROVAL OF  
ARRANGEMENTS REGARDING THE ACCESS, COLLECTION,  
STORAGE AND USE OF DERIVATIVES DATA**

On January 24, 2019, the Minister of Finance approved, pursuant to section 143.10 of the *Securities Act* (Ontario), arrangements that the Ontario Securities Commission entered into with each of

- the Office of the Superintendent of Securities, Newfoundland and Labrador,
- the Office of the Superintendent of Securities, Prince Edward Island,
- the Office of the Superintendent of Securities, Northwest Territories,
- the Office of the Superintendent of Securities, Nunavut and
- the Office of the Superintendent of Securities, Yukon (each, a “**Partner Jurisdiction**”).

The arrangements set out an understanding between the OSC and each Partner Jurisdiction that the OSC will act as an agent for the purposes of accessing, collecting, storing, analyzing and reporting on derivatives data, as collected by relevant trade repositories (together, the “**Derivatives Data Arrangements**”). The Derivatives Data Arrangements were published in the Bulletin on December 13, 2018 at (2018), 41 OSCB 9691. The Derivatives Data Arrangements are effective January 24, 2019. The text of the Derivatives Data Arrangements is reproduced in Chapter 5 of this Bulletin.

Questions may be referred to:

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**1.4 Notices from the Office of the Secretary**

**1.4.1 Dennis L. Meharchand and Valt.X Holdings Inc.**

**FOR IMMEDIATE RELEASE  
January 31, 2019**

**DENNIS L. MEHARCHAND and  
VALT.X HOLDINGS INC.,  
File No. 2017-4**

**TORONTO** – The Commission issued its Reasons and Decision on Sanctions and Costs and an Order in the above noted matter.

A copy of the Reasons and Decision on Sanctions and Costs and the Order dated January 30, 2019 are available at [www.osc.gov.on.ca](http://www.osc.gov.on.ca).

OFFICE OF THE SECRETARY  
GRACE KNAKOWSKI  
SECRETARY TO THE COMMISSION

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For investor inquiries:

OSC Contact Centre  
416-593-8314  
1-877-785-1555 (Toll Free)

**1.4.2 Benedict Cheng et al.**

**FOR IMMEDIATE RELEASE  
February 5, 2019**

**BENEDICT CHENG,  
FRANK SOAVE,  
JOHN DAVID ROTHSTEIN and  
ERIC TREMBLAY,  
File No. 2017-13**

**TORONTO** – Following the hearing on the merits in the above noted matter, the Commission issued its Reasons and Decision.

A copy of the Reasons and Decision dated February 4, 2019 is available at [www.osc.gov.on.ca](http://www.osc.gov.on.ca).

OFFICE OF THE SECRETARY  
GRACE KNAKOWSKI  
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## Chapter 2

# Decisions, Orders and Rulings

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### 2.1 Decisions

#### 2.1.1 Mackenzie Financial Corporation et al.

##### Headnote

National Policy 11-203 Process for Exemptive Relief Applications in Multiple Jurisdictions – Relief granted to exchange-traded mutual funds for extensions of the lapse date of their prospectus – Filer will incorporate offering of the ETFs under the same offering documents as related family of funds when they are renewed – Extension of lapse date will not affect the currency or accuracy of the information contained in the current prospectus.

##### Applicable Legislative Provisions

Securities Act, R.S.O. 1990, c. S.5, as am., s. 62(5).

January 28, 2019

IN THE MATTER OF  
THE SECURITIES LEGISLATION OF  
ONTARIO  
(the Jurisdiction)

AND

IN THE MATTER OF  
THE PROCESS FOR EXEMPTIVE RELIEF APPLICATIONS  
IN MULTIPLE JURISDICTIONS

AND

IN THE MATTER OF  
MACKENZIE FINANCIAL CORPORATION  
(the Filer)

AND

MACKENZIE CANADIAN SHORT TERM FIXED INCOME ETF,  
MACKENZIE CORE PLUS CANADIAN FIXED INCOME ETF,  
MACKENZIE CORE PLUS GLOBAL FIXED INCOME ETF,  
MACKENZIE FLOATING RATE INCOME ETF,  
MACKENZIE GLOBAL HIGH YIELD FIXED INCOME ETF,  
MACKENZIE UNCONSTRAINED BOND ETF,  
MACKENZIE GLOBAL LEADERSHIP IMPACT ETF,  
MACKENZIE IVY GLOBAL EQUITY ETF AND  
MACKENZIE PORTFOLIO COMPLETION ETF  
(the Funds)

DECISION

##### Background

The principal regulator in the Jurisdiction has received an application from the Filer on behalf of the Funds for a decision under the securities legislation of the Jurisdiction (the **Legislation**) that the time limits for the renewal of the long form prospectus of the Funds dated April 3, 2018 (the **Prospectus**) be extended to those time limits that would apply if the lapse date of the Prospectus was June 20, 2019 (the **Exemption Sought**).

Under the Process for Exemptive Relief Applications in Multiple Jurisdictions (for a passport application):

- (i) the Ontario Securities Commission is the principal regulator for this application; and
- (ii) the Filer has provided notice that section 4.7(1) of Multilateral Instrument 11-102 *Passport System* (**MI 11-102**) is intended to be relied upon in each of the other provinces and territories of Canada (together with Ontario, the **Canadian Jurisdictions**).

### Interpretation

Terms defined in National Instrument 14-101 *Definitions* and MI 11-102 have the same meaning if used in this decision, unless otherwise defined.

### Representations

This decision is based on the following facts represented by the Filer:

1. The Filer is a corporation existing under the laws of the Province of Ontario. The Filer's head office is located in Toronto, Ontario.
2. The Filer is registered as an investment fund manager, portfolio manager, exempt market dealer and commodity trading manager in Ontario. The Filer is also registered as a portfolio manager and exempt market dealer in the Canadian Jurisdictions and as an investment fund manager in Newfoundland and Labrador and Québec.
3. The Filer is the trustee and investment fund manager of the Funds.
4. Each of the Funds is an exchange-traded mutual fund (an **ETF**) established under the laws of Ontario, and is a reporting issuer as defined in the securities legislation of each of the Canadian Jurisdictions.
5. Neither the Filer nor any of the Funds are in default of securities legislation in any of the Canadian Jurisdictions.
6. The Funds currently distribute securities in the Canadian Jurisdictions under the Prospectus.
7. Pursuant to subsection 62(1) of the *Securities Act* (Ontario) (the **Act**), the lapse date of the Prospectus is April 3, 2019 (the **Lapse Date**). Accordingly, under subsection 62(2) of the Act, the distribution of securities of each of the Funds would have to cease on the Lapse Date unless: (i) the Funds file a *pro forma* prospectus at least 30 days prior to the Lapse Date; (ii) the final prospectus is filed no later than 10 days after the Current Lapse Date; and (iii) a receipt for the final prospectus is obtained within 20 days of the Lapse Date.
8. The Filer is the investment fund manager of 19 other ETFs as listed in Schedule "A" (the **Other Funds**) that currently distribute their securities under a prospectus with a lapse date of June 20, 2019 (the **Other Funds Prospectus**).
9. The Filer wishes to combine the Prospectus with the Other Funds Prospectus into a prospectus dated on or about June 20, 2019 in order to reduce renewal, printing and related costs. Offering the Funds and the Other Funds under one prospectus would facilitate the distribution of the Funds in the Canadian Jurisdictions under the same prospectus and enable the Filer to streamline disclosure across the Filer's fund platform. As the Funds and the Other Funds are managed by the Filer, offering them under the same prospectus would allow investors to more easily compare their features.
10. It would be unreasonable to incur the costs and expenses associated with preparing two separate renewal prospectuses given how close in proximity the Lapse Date is with the lapse date of the Other Funds Prospectus.
11. Except as otherwise disclosed within Amendment No. 1 to the Prospectus dated October 10, 2018 (**Amendment No. 1**), there have been no material changes in the affairs of the Funds since the date of the Prospectus. Amendment No. 1 was accompanied with the following amended ETF facts document filings: (i) for Mackenzie Unconstrained Bond ETF, Mackenzie Floating Rate Income ETF, Mackenzie Core Plus Canadian Fixed Income ETF, Mackenzie Global High Yield Fixed Income ETF, Mackenzie Global Leadership Impact ETF, Mackenzie Portfolio Completion ETF, Mackenzie Ivy Global Equity ETF and Mackenzie Canadian Short Term Fixed Income ETF, to announce a reduction in management fees, effective October 10, 2018; and (ii) for Mackenzie Unconstrained Bond ETF to reflect a change in its risk rating from "Low to Medium" to "Low" (together, the **Amended ETF Facts**). Accordingly, the Prospectus, Amendment No. 1, the Amended ETF Facts and the current ETF facts document of Mackenzie Core Plus Global Fixed Income ETF, represent the current information of the Funds.

12. Given the disclosure obligations of the Funds, should a material change in the affairs of any of the Funds occur, the Prospectus and the current ETF facts document(s) of the applicable Fund(s) will be amended as required under the Legislation.
13. New investors in the Funds will receive delivery of the most recently filed ETF facts document(s) of the applicable Fund(s). The Prospectus and Amendment No. 1 will still be available upon request.
14. The Exemption Sought will not affect the accuracy of the information contained in the Prospectus and therefore will not be prejudicial to the public interest.

**Decision**

The principal regulator is satisfied that the decision meets the test set out in the Legislation for the principal regulator to make the decision.

The decision of the principal regulator under the Legislation is that the Exemption Sought is granted.

“Darren McKall”  
Manager,  
Investment Funds and Structured Products  
Ontario Securities Commission

**SCHEDULE “A”**

**THE OTHER FUNDS**

Mackenzie Maximum Diversification Canada Index ETF  
Mackenzie Maximum Diversification US Index ETF  
Mackenzie Maximum Diversification Developed Europe Index ETF  
Mackenzie Maximum Diversification All World Developed Index ETF  
Mackenzie Maximum Diversification Emerging Markets Index ETF  
Mackenzie Maximum Diversification All World Developed ex North America Index ETF  
Mackenzie China A-Shares CSI 300 Index ETF  
Mackenzie Canadian Large Cap Equity Index ETF  
Mackenzie Canadian Equity Index ETF  
Mackenzie US Large Cap Equity Index ETF  
Mackenzie US Large Cap Equity Index ETF (CAD-Hedged)  
Mackenzie International Equity Index ETF  
Mackenzie International Equity Index ETF (CAD-Hedged)  
Mackenzie Canadian Aggregate Bond Index ETF  
Mackenzie Canadian Short-Term Bond Index ETF  
Mackenzie Canadian All Corporate Bond Index ETF  
Mackenzie US TIPS Index ETF (CAD-Hedged)  
Mackenzie US Investment Grade Corporate Bond Index ETF (CAD-Hedged)  
Mackenzie US High Yield Bond Index ETF (CAD-Hedged)

## 2.1.2 Accelerate Financial Technologies Inc. et al.

### Headnote

National Policy 11-203 Process for Exemptive Relief Applications in Multiple Jurisdictions – Relief to permit exchange-traded mutual fund prospectus to omit an underwriter's certificate – Relief granted from take-over bid requirements for normal course purchases of securities on a marketplace – Relief granted to facilitate the offering of exchange-traded mutual funds.

### Applicable Legislative Provisions

Securities Act, R.S.O. 1990, c. S.5, as am., ss. 59(1), 147.

National Instrument 62-104 Take-Over Bids and Issuer Bids, Part 2 and s. 6.1.

**Citation:** *Re Accelerate Financial Technologies Inc.*, 2019 ABASC 13

January 18, 2019

IN THE MATTER OF  
THE SECURITIES LEGISLATION OF  
ALBERTA AND ONTARIO  
(the Jurisdictions)

AND

IN THE MATTER OF  
THE PROCESS FOR EXEMPTIVE RELIEF APPLICATIONS  
IN MULTIPLE JURISDICTIONS

AND

IN THE MATTER OF  
ACCELERATE FINANCIAL TECHNOLOGIES INC.  
(the Filer)

AND

ACCELERATE ABSOLUTE RETURN HEDGE FUND,  
ACCELERATE ENHANCED CANADIAN BENCHMARK ALTERNATIVE FUND,  
ACCELERATE PRIVATE EQUITY ALPHA FUND  
(the Proposed ETFs)

DECISION

### Background

The securities regulatory authority or regulator in each of the Jurisdictions (each a **Decision Maker**) has received an application from the Filer on behalf of the Proposed ETFs and such other exchange-traded mutual funds as may be managed by the Filer or an affiliate of the Filer in the future (the **Future ETFs**, and together with the Proposed ETFs, the **ETFs** and each an **ETF**) for a decision under the securities legislation of the Jurisdictions (the **Legislation**) that:

- (a) exempts the Filer and each ETF from the requirement to include a certificate of an underwriter in an ETF's prospectus (the **Underwriter's Certificate Requirement**); and
- (b) exempts a person or company purchasing Listed Securities (as defined below) in the normal course through the facilities of the Toronto Stock Exchange (**TSX**) or another Marketplace (as defined below) from the Take-over Bid Requirements (as defined below)

(collectively, the **Exemption Sought**).

Under the Process for Exemptive Relief Applications in Multiple Jurisdictions (for a dual application):

- (a) the Alberta Securities Commission is the principal regulator for this application;

- (b) the Filer has provided notice that subsection 4.7(1) of Multilateral Instrument 11-102 *Passport System (MI 11-102)* is intended to be relied upon in each of the provinces and territories of Canada (the **Offering Jurisdictions**), other than Ontario; and
- (c) the decision is the decision of the principal regulator and evidences the decision of the securities regulatory authority or regulator in Ontario.

### Interpretation

Terms defined in National Instrument 14-101 *Definitions* or MI 11-102 have the same meaning if used in this decision, unless otherwise defined herein.

**Affiliate Dealer** means a registered dealer that is an affiliate of an Authorized Dealer or Designated Broker and that participates in the resale of Creation Units (as defined below) from time to time.

**Authorized Dealer** means a registered dealer that has entered, or intends to enter, into an agreement with the manager of an ETF authorizing the dealer to subscribe for, purchase and redeem Creation Units from one or more ETFs on a continuous basis from time to time.

**Basket of Securities** means, in relation to the Listed Securities of an ETF, a group of securities identified from time to time that collectively reflect the constituents of the portfolio of an ETF.

**Designated Broker** means a registered dealer that has entered, or intends to enter, into an agreement with the manager of an ETF to perform certain duties in relation to the ETF, including the posting of a liquid two-way market for the trading of the ETF's Listed Securities on the TSX or another Marketplace.

**Form 41-101F2** means Form 41-101F2 *Information Required in an Investment Fund Prospectus*.

**Listed Securities** means a series of securities of an ETF distributed pursuant to a long form prospectus prepared pursuant to NI 41-101 and Form 41-101F2 that is listed on the TSX or another Marketplace.

**Marketplace** means a "marketplace" as defined in National Instrument 21-101 *Marketplace Operation* that is located in Canada.

**NI 41-101** means National Instrument 41-101 *General Prospectus Requirements*.

**NI 81-102** means National Instrument 81-102 *Investment Funds*.

**Other Dealer** means a registered dealer that acts as authorized dealer or designated broker to exchange-traded funds that are not managed by the Filer.

**Prescribed Number of Listed Securities** means the number of Listed Securities of an ETF determined by the Filer from time to time for the purpose of subscription orders, exchanges, redemptions or for other purposes.

**Securityholders** means beneficial or registered holders of Listed Securities or Unlisted Securities (as defined below) as applicable.

**Take-over Bid Requirements** means the requirements of National Instrument 62-104 *Take-Over Bids and Issuer Bids* relating to take-over bids, including the requirement to file a report of a take-over bid and to pay the accompanying fee, in each Jurisdiction.

**Unlisted Securities** means a series of securities of an ETF offered only on a private placement basis pursuant to available prospectus exemptions, including the accredited investor exemption, under securities laws.

### Representations

This decision is based on the following facts represented by the Filer:

#### *The Filer*

1. The Filer is a corporation incorporated under the *Business Corporations Act* (Alberta), with its head office located in Calgary, Alberta.



2. The Filer has applied for registration as an investment fund manager, portfolio manager and exempt market dealer in Alberta and Ontario.
3. The Filer will be the investment fund manager of the ETFs and will be the trustee of the ETFs where the ETF is a trust.
4. The Filer is not in default of securities legislation in any of the Offering Jurisdictions.

***The ETFs***

5. Each Proposed ETF will be an alternative mutual fund (as defined in NI 81-102) structured as a trust that is governed by the laws of a Jurisdiction. The Future ETFs will be either trusts or corporations or classes thereof governed by the laws of a Jurisdiction or the laws of Canada.
6. Subject to any exemptions that have been, or may be, granted by the applicable securities regulatory authorities, each ETF will be an open-ended mutual fund subject to NI 81-102, and Securityholders of each ETF will have the right to vote at a meeting of Securityholders in respect of matters prescribed by NI 81-102.
7. Each ETF may issue more than one series of securities, including, but not limited to Listed Securities and Unlisted Securities.
8. The Filer has filed, or will file, a long form prospectus prepared in accordance with NI 41-101 in respect of the Listed Securities, subject to any exemptions that may be granted by the applicable securities regulatory authorities.
9. Because the Listed Securities will be distributed pursuant to a long form prospectus prepared pursuant to NI 41-101 and Form 41-101F2, each ETF will be a reporting issuer in the Offering Jurisdictions in which its securities are distributed.
10. Listed Securities will be distributed on a continuous basis in one or more of the Offering Jurisdictions under a prospectus. Listed Securities may generally only be subscribed for or purchased directly from the ETFs (**Creation Units**) by Authorized Dealers or Designated Brokers. Generally, subscriptions or purchases may only be placed for a Prescribed Number of Listed Securities (or a multiple thereof) on any day when there is a trading session on the TSX or other Marketplace. Authorized Dealers or Designated Brokers subscribe for Creation Units for the purpose of facilitating investor purchases of Listed Securities on the TSX or another Marketplace.
11. In addition to subscribing for and reselling Creation Units, Authorized Dealers, Designated Brokers and Affiliate Dealers will also generally be engaged in purchasing and selling Listed Securities of the same class or series as the Creation Units in the secondary market. Other Dealers may also be engaged in purchasing and selling Listed Securities of the same class or series as the Creation Units in the secondary market despite not being an Authorized Dealer, Designated Broker or Affiliate Dealer.
12. Each Designated Broker or Authorized Dealer that subscribes for Creation Units must deliver, in respect of each Prescribed Number of Listed Securities to be issued, payment consisting of, depending on the terms of the agreement with the Designated Broker or Authorized Dealer or at the Filer's discretion, a Basket of Securities and cash, cash only or a combination of securities and cash, in each case in an amount sufficient so that the value of the Basket of Securities and cash, cash or securities and cash delivered is equal to the net asset value of the Listed Securities subscribed for next determined following the receipt of the subscription order.
13. Upon notice given by the Filer from time to time and, in any event, not more than once quarterly, a Designated Broker may be contractually required to subscribe for Creation Units of an ETF for cash in an amount not to exceed a specified percentage of the net asset value of the ETF or such other amount established by the Filer.
14. The Designated Brokers and Authorized Dealers will not receive any fees or commissions in connection with the issuance of Creation Units to them. On the issuance of Creation Units, the Filer or the ETF may, at the Filer's discretion, charge a fee to a Designated Broker or an Authorized Dealer to offset the expenses incurred in issuing the Creation Units.
15. Each ETF will appoint a Designated Broker to perform certain other functions, which include standing in the market with a bid and ask price for Listed Securities for the purpose of maintaining liquidity for the Listed Securities.
16. Except for Authorized Dealer and Designated Broker subscriptions for Creation Units, as described above, and other distributions that are exempt from the prospectus requirement under the Legislation, Listed Securities generally will not be available for purchase directly from an ETF. Investors are generally expected to purchase and sell Listed Securities, directly or indirectly, through dealers executing trades through the facilities of the TSX or another Marketplace. Listed

Securities may also be issued directly to Securityholders upon a reinvestment of distributions of income or capital gains.

17. Securityholders that are not Designated Brokers or Authorized Dealers that wish to dispose of their Listed Securities may generally do so by selling their Listed Securities on the TSX or other Marketplace, through a registered dealer, subject only to customary brokerage commissions. A Securityholder that holds a Prescribed Number of Listed Securities or multiple thereof may exchange such Listed Securities for, at the discretion of the Filer, Baskets of Securities or other securities and/or cash. Securityholders may also redeem Listed Securities for cash at a redemption price equal to 95% of the closing price of the Listed Securities on the TSX or other Marketplace on the date of redemption, subject to a maximum redemption price of the applicable net asset value per Listed Security.
18. Holders of Unlisted Securities may redeem such securities in any number for cash at a redemption price per Unlisted Security equal to the net asset value per Unlisted Security on the effective day of redemption.

***Underwriter's Certificate Requirement***

19. Authorized Dealers and Designated Brokers will not provide the same services in connection with a distribution of Creation Units as would typically be provided by an underwriter in a conventional underwriting.
20. The Filer will generally conduct its own marketing, advertising and promotion of the ETFs to the extent permitted by its registrations.
21. Authorized Dealers and Designated Brokers will not be involved in the preparation of an ETF's prospectus, will not perform any review or any independent due diligence as to the content of an ETF's prospectus, and will not incur any marketing costs or receive any underwriting fees or commissions from an ETF or the Filer in connection with the distribution of Listed Securities. The Authorized Dealers and Designated Brokers generally seek to profit from their ability to create and redeem Listed Securities by engaging in arbitrage trading to capture spreads between the trading prices of Listed Securities and their underlying securities and by making markets for their clients to facilitate client trading in Listed Securities.

***Take-over Bid Requirements***

22. As equity securities that will trade on the TSX or another Marketplace, it is possible for a person or company to acquire a percentage of the outstanding Listed Securities that will trigger the Take-over Bid Requirements. However:
  - (a) it will not be possible for one or more Securityholders to exercise control or direction over an ETF, as the constating documents of each ETF will provide that only the Filer may call a meeting of the Securityholders;
  - (b) it will be difficult for purchasers of Listed Securities to monitor compliance with the Take-over Bid Requirements because the number of outstanding Listed Securities will always be in flux as a result of the ongoing issuance and redemption of Listed Securities by each ETF; and
  - (c) the way in which the Listed Securities will be priced deters anyone from either seeking to acquire control, or offering to pay a control premium for outstanding Listed Securities because pricing for each Listed Security will generally reflect the net asset value of the Listed Securities.
23. The application of the Take-over Bid Requirements to the ETFs would have an adverse impact on the liquidity of the Listed Securities, because they could cause Designated Brokers and other large Securityholders to cease trading Listed Securities once a Securityholder has reached the prescribed threshold at which the Take-over Bid Requirements would apply. This, in turn, could serve to provide conventional mutual funds with a competitive advantage over the ETFs.

**Decision**

Each of the Decision Makers is satisfied that the decision meets the test set out in the Legislation for the Decision Maker to make the decision.

The decision of the Decision Makers under the Legislation is that the Exemption Sought is granted.

"Timothy Robson"  
Manager, Legal  
Corporate Finance  
Alberta Securities Commission

**2.2 Orders**

**2.2.1 Dennis L. Meharchand and Valt.X Holdings Inc. – ss. 127(1), 127.1**

**FILE NO.:** 2017-4

**IN THE MATTER OF  
DENNIS L. MEHARCHAND and  
VALT.X HOLDINGS INC.**

Timothy Moseley, Vice-Chair and Chair of the Panel  
Deborah Leckman, Commissioner  
Robert P. Hutchison, Commissioner

January 30, 2019

**ORDER**

(Subsection 127(1) and section 127.1 of the  
*Securities Act*, RSO 1990, c S.5)

WHEREAS on December 18, 2018, the Ontario Securities Commission held a hearing at the offices of the Commission, located at 20 Queen Street West, 17th Floor, Toronto, Ontario, to consider the sanctions and costs that the Commission should impose on the respondents as a result of the findings in the Commission's Reasons and Decision on the merits, issued on October 19, 2018;

ON READING the materials filed by Staff of the Commission (**Staff**), and on hearing the submissions of Staff and of Dennis L. Meharchand, appearing on his own behalf and on behalf of Valt.X Holdings Inc. (the **Respondents**);

IT IS ORDERED THAT:

1. pursuant to paragraph 2 of subsection 127(1) of the Act, trading in any securities by the Respondents shall cease permanently;
2. pursuant to paragraph 2.1 of subsection 127(1) of the Act, the Respondents are prohibited permanently from acquiring securities;
3. pursuant to paragraph 3 of subsection 127(1) of the Act, the exemptions contained in Ontario securities law shall not apply to the Respondents permanently;
4. pursuant to paragraphs 7 and 8.1 of subsection 127(1) of the Act, Mr. Meharchand shall resign any positions he holds as a director or officer of an issuer or a registrant;
5. pursuant to paragraphs 8 and 8.2 of subsection 127(1) of the Act, Mr. Meharchand is prohibited permanently from becoming or acting as a director or officer of any issuer or registrant;
6. pursuant to paragraph 8.5 of subsection 127(1) of the Act, Mr. Meharchand is prohibited permanently from becoming or acting as a registrant or as a promoter;
7. pursuant to paragraph 9 of subsection 127(1) of the Act, Mr. Meharchand shall pay an administrative penalty of \$550,000, which amount shall be designated for allocation or use by the Commission in accordance with subclause 3.4(2)(b)(i) or (ii) of the Act;
8. pursuant to paragraph 10 of subsection 127(1) of the Act, the Respondents shall be required, jointly and severally, to disgorge to the Commission the sums of C\$1.45 million and US\$140,000, which amounts shall be designated for allocation or use by the Commission in accordance with subclause 3.4(2)(b)(i) or (ii) of the Act;
9. pursuant to section 127.1 of the Act, Mr. Meharchand shall pay costs of \$165,083.17 to the Commission; and
10. pursuant to section 127.1 of the Act, Valt.X shall pay costs of \$110,055.45 to the Commission.

"Timothy Moseley"

"Deborah Leckman"

"Robert P. Hutchison"

## 2.2.2 NWQ Investment Management Company, LLC – s. 80 of the CFA

### Headnote

Section 80 of the Commodity Futures Act (Ontario) – Foreign adviser exempted from the adviser registration requirement in paragraph 22(1)(b) of the CFA where such adviser acts as an adviser in respect of commodity futures contracts or commodity futures options (Contracts) for certain investors in Ontario who meet the definition of “permitted client” in National Instrument 31-103 Registration Requirements, Exemptions and Ongoing Registrant Obligations – Contracts are primarily traded on commodity futures exchanges outside of Canada and primarily cleared outside of Canada.

Terms and conditions of exemption correspond to the relevant terms and conditions of the comparable exemption from the adviser registration requirement available to international advisers in respect of securities set out in section 8.26 of National Instrument 31-103 Registration Requirements, Exemptions and Ongoing Registrant Obligations – Exemption also subject to a “sunset clause” condition.

### Applicable Legislative Provisions

Commodity Futures Act, R.S.O. 1990, c. C.20. as am., ss. 1(1), 22(1)(b), 80.

Securities Act, R.S.O. 1990, c. S.5, as am., s. 25(3).

National Instrument 31-103 Registration Requirements, Exemptions and Ongoing Registrant Obligations, ss. 1.1, 8.26.

Ontario Securities Commission Rule 13-502 Fees.

January 15, 2019

**IN THE MATTER OF  
THE COMMODITY FUTURES ACT,  
R.S.O. 1990, CHAPTER C.20, AS AMENDED  
(the CFA)**

**AND**

**IN THE MATTER OF  
NWQ INVESTMENT MANAGEMENT COMPANY, LLC**

**ORDER  
(Section 80 of the CFA)**

**UPON** the application (the **Application**) of NWQ Investment Management Company, LLC (the **Applicant**) to the Ontario Securities Commission (the **Commission**) for an order, pursuant to section 80 of the CFA (the **Order**), that the Applicant, and any individuals engaging in, or holding themselves out as engaging in, the business of advising others as to trading in Contracts (as defined below) on the Applicant’s behalf (the **Representatives**), be exempt, for a specified period of time, from the adviser registration requirement in paragraph 22(1)(b) of the CFA, subject to certain terms and conditions;

**AND UPON** considering the Application and the recommendation of staff of the Commission;

**AND WHEREAS** for the purposes of this Order:

“**CFA Adviser Registration Requirement**” means the provisions of section 22 of the CFA that prohibit a person or company from acting as an adviser with respect to trading in Contracts unless the person or company is registered in the appropriate category of registration under the CFA;

“**CFTC**” means the Commodity Futures Trading Commission of the United States;

“**Contract**” has the meaning ascribed to that term in subsection 1(1) of the CFA;

“**Foreign Contract**” means a Contract that is primarily traded on one or more organized exchanges that are located outside of Canada and primarily cleared through one or more clearing corporations that are located outside of Canada;

“**International Adviser Exemption**” means the exemption set out in section 8.26 of NI 31-103 from the OSA Adviser Registration Requirement;

“**NI 31-103**” means National Instrument 31-103 *Registration Requirements, Exemptions and Ongoing Registrant Obligations*, as amended from time to time;

“**OSA**” means the *Securities Act*, R.S.O. 1990, c. S.5, as amended from time to time;

“**OSA Adviser Registration Requirement**” means the provisions of section 25 of the OSA that prohibit a person or company from acting as an adviser with respect to investing in, buying or selling securities unless the person or company is registered in the appropriate category of registration under the OSA;

“**Permitted Client**” means a client in Ontario that is a “permitted client”, as that term is defined in section 1.1. of NI 31-103, except that for purposes of this Order such definition shall exclude a person or company registered under the securities or commodities futures legislation of a jurisdiction of Canada as an adviser or dealer;

“**Previous Order**” means the exemption from the CFA Adviser Registration Requirement in respect of providing advice to Permitted Clients as to the trading of Foreign Contracts (subject to certain terms and conditions), granted by the Commission to the Applicant on January 17, 2014, and expiring on January 17, 2019;

“**SEC**” means the Securities and Exchange Commission of the United States;

“**specified affiliate**” has the meaning ascribed to that term in Form 33-109F6 to National Instrument 33-109 *Registration Information*;

“**U.S. or United States**” means the United States of America; and

“**U.S. Advisers Act**” means the *Investment Advisers Act of 1940* of the United States, as amended from time to time.

**AND UPON** the Applicant having represented to the Commission that:

1. The Applicant is a limited liability company organized under the laws of the State of Delaware, United States. The Applicant’s principal place of business is located in Los Angeles, California.
2. The Applicant is an indirect, wholly-owned, subsidiary of Teachers Insurance and Annuity Association of America, the principal office of which is located in New York, New York.
3. The Applicant is registered in the United States with the SEC as an investment adviser under the U.S. Advisers Act and is exempted from registration as a commodity trading adviser with the CFTC.
4. The Applicant engages in the business of an adviser with respect to securities and with respect to other investments, including Contracts, in California and its other offices in the United States. As of December 31, 2017, the Applicant managed approximately U.S.\$12.2 billion in assets.
5. The Applicant provides its advisory services in a broad array of fixed income, equity and other investment strategies, including: government securities of the U.S. and other countries; debt securities, preferred securities, and equity securities of U.S. and non-U.S. companies, including depository receipts of these securities; convertible securities; exchange traded funds and shares of mutual funds; securities of master limited partnerships; shares of business development companies; and money market instruments including certificates of deposit, time deposits, bankers acceptances notes, commercial paper, repurchase agreements, and money market funds. Depending on the particular strategy, the Applicant may invest in a variety of securities and other financial instruments, including, in certain cases, derivatives, and employ various methods of analysis and investment techniques. In the United States, the Applicant instructs trades for fixed income futures, commodity futures, options on equity securities, options on commodity futures, and credit default swaps, all on a limited basis for a variety of strategies.
6. The Applicant is registered in a category of registration, or operates under an exemption from registration, under the applicable securities legislation or commodity futures legislation of the United States that permits it to carry on the activities in the United States that registration as an adviser under the CFA in the category of commodity trading manager would permit it to carry on in Ontario.
7. The Applicant advises Permitted Clients with respect to foreign securities in reliance on the International Adviser Exemption and therefore is not registered under the OSA.
8. The Applicant is not registered in any capacity under the CFA.
9. In reliance on, and in accordance with the terms and conditions of, the Previous Order, the Applicant provides discretionary advisory services to Permitted Clients in respect of Foreign Contracts in connection principally with respect to foreign currency and interest rate futures, options, and forwards.

10. As it does pursuant to the Previous Order, the Applicant proposes to continue providing advisory services in respect of Foreign Contracts to Permitted Clients (**Advisory Services**).
11. The Applicant is not in default of securities legislation, commodity futures legislation, or derivatives legislation of any jurisdiction in Canada. The Applicant is in compliance in all material respects with the securities laws, commodity futures laws, and derivatives laws of the United States.
12. If the advisory services were being provided by the Applicant with respect to securities (as defined in subsection 1(1) of the OSA), the Applicant would be able to rely on the International Adviser Exemption to provide such services to Permitted Clients on a basis that would be exempt from the OSA Adviser Registration Requirement.
13. There is currently no exemption from the CFA Adviser Registration Requirement that is equivalent to the International Adviser Exemption. Consequently, in the absence of the Order, the Applicant would be required to satisfy the CFA Adviser Registration Requirement to provide the Advisory Services by applying for and obtaining registration in Ontario as an adviser under the CFA in the category of commodity trading manager.
14. In connection with the Previous Order, the Applicant has submitted to the Commission a completed *Submission to Jurisdiction and Appointment of Agent for Service* substantially in the form attached as Appendix "A" to the Order.
15. To the best of the Applicant's knowledge, the Applicant confirms that there are currently no regulatory actions of the type contemplated by the Notice of Regulatory Action attached as Appendix "B" to the Order, except as otherwise disclosed to the Commission.

**AND UPON** being satisfied that it would not be prejudicial to the public interest for the Commission to make this Order.

**IT IS ORDERED**, pursuant to section 80 of the CFA, that the Applicant and the Representatives are exempt from the adviser registration requirement in paragraph 22(1)(b) of the CFA in respect of providing advice to Permitted Clients as to the trading of Foreign Contracts, provided that:

- (a) the Applicant provides advice to Permitted Clients only as to trading in Foreign Contracts and does not advise any Permitted Client as to trading in Contracts that are not Foreign Contracts, unless providing such advice is incidental to its providing advice on Foreign Contracts;
- (b) the Applicant's head office or principal place of business remains in the United States;
- (c) the Applicant is registered in a category of registration, or operates under an exemption from registration, under the applicable securities legislation or commodity futures legislation of the United States, that permits it to carry on the activities in the United States that registration as an adviser under the CFA in the category of commodity trading manager would permit it to carry on in Ontario;
- (d) the Applicant continues to engage in the business of an adviser, as defined in the CFA, in the United States;
- (e) as at the end of the Applicant's most recently completed financial year, not more than 10% of the aggregate consolidated gross revenue of the Applicant, its affiliates, and its affiliated partnerships (excluding the gross revenue of an affiliate or affiliated partnership of the Applicant if the affiliate or affiliated partnership is registered under securities legislation, commodity futures legislation, or derivatives legislation of a jurisdiction of Canada) was derived from the portfolio management activities of the Applicant, its affiliates, and its affiliated partnerships in Canada (which, for greater certainty, includes both securities-related and commodity futures-related activities);
- (f) before advising a Permitted Client with respect to Foreign Contracts, the Applicant notifies the Permitted Client of all of the following:
  - (i) the Applicant is not registered in Ontario to provide the advice described under paragraph (a) of this Order;
  - (ii) the foreign jurisdiction in which the Applicant's head office or principal place of business is located;
  - (iii) all, or substantially all, of the Applicant's assets may be situated outside of Canada;
  - (iv) there may be difficulty enforcing legal rights against the Applicant because of the above; and
  - (v) the name and address of the Applicant's agent for service of process in Ontario;

- (g) the Applicant has submitted to the Commission a completed *Submission to Jurisdiction and Appointment of Agent for Service* in the form attached as Appendix "A";
- (h) the Applicant notifies the Commission of any regulatory action initiated after the date of this Order with respect to the Applicant or, to the best of the Applicant's knowledge and after reasonable inquiry, any predecessors or the specified affiliates of the Applicant by filing Appendix "B" within 10 days of the commencement of each such action; and
- (i) if the Applicant is not subject to the requirement to pay a participation fee in Ontario because it is not registered under the OSA and does not rely on the International Adviser Exemption, by December 31st of each year, the Applicant pays a participation fee based on its specified Ontario revenues for its previous financial year in compliance with the requirements of Part 3 and section 6.4 of Ontario Securities Commission Rule 13-502 *Fees* as if the Applicant relied on the International Adviser Exemption; and

**IT IS FURTHER ORDERED** that this Order will terminate on the earliest of:

- (a) the expiry of any transition period as may be provided by law, after the effective date of the repeal of the CFA;
- (b) six months, or such other transition period as may be provided by law, after the coming into force of any amendment to Ontario commodity futures law (as defined in the CFA) or Ontario securities law (as defined in the OSA) that affects the ability of the Applicant to act as an adviser to a Permitted Client; and
- (c) five years after the date of this Order.

**DATED** at Toronto, Ontario this 15th day of January, 2019.

"Cecilia Williams"  
Commissioner  
Ontario Securities Commission

"AnneMarie Ryan"  
Commissioner  
Ontario Securities Commission

APPENDIX "A"

SUBMISSION TO JURISDICTION AND APPOINTMENT OF AGENT FOR SERVICE

INTERNATIONAL DEALER OR INTERNATIONAL ADVISER EXEMPTED FROM  
REGISTRATION UNDER THE COMMODITY FUTURES ACT, ONTARIO

1. Name of person or company ("International Firm"):
2. If the International Firm was previously assigned an NRD number as a registered firm or an unregistered exempt international firm, provide the NRD number of the firm:
3. Jurisdiction of incorporation of the International Firm:
4. Head office address of the International Firm:
5. The name, e-mail address, phone number and fax number of the International Firm's individual(s) responsible for the supervisory procedure of the International Firm, its chief compliance officer, or equivalent.  
  
Name:  
E-mail address:  
Phone:  
Fax:
6. The International Firm is relying on an exemption order under section 38 or section 80 of the *Commodity Futures Act* (Ontario) that is similar to the following exemption in National Instrument 31-103 *Registration Requirements, Exemptions and Ongoing Registrant Obligations* (the "Relief Order"):  
  
☐ Section 8.18 [*international dealer*]  
☐ Section 8.26 [*international adviser*]  
☐ Other [specify]:
7. Name of agent for service of process (the "Agent for Service"):
8. Address for service of process on the Agent for Service:
9. The International Firm designates and appoints the Agent for Service at the address stated above as its agent upon whom may be served a notice, pleading, subpoena, summons or other process in any action, investigation or administrative, criminal, quasi-criminal or other proceeding (a "Proceeding") arising out of or relating to or concerning the International Firm's activities in the local jurisdiction and irrevocably waives any right to raise as a defence in any such proceeding any alleged lack of jurisdiction to bring such Proceeding.
10. The International Firm irrevocably and unconditionally submits to the non-exclusive jurisdiction of the judicial, quasi-judicial and administrative tribunals of the local jurisdiction in any Proceeding arising out of or related to or concerning the International Firm's activities in the local jurisdiction.
11. Until 6 years after the International Firm ceases to rely on the Relief Order, the International Firm must submit to the regulator:
  - (a) a new Submission to Jurisdiction and Appointment of Agent for Service in this form no later than the 30th day before the date this Submission to Jurisdiction and Appointment of Agent for Service is terminated;
  - (b) an amended Submission to Jurisdiction and Appointment of Agent for Service no later than the 30th day before any change in the name or above address of the Agent for Service;
  - (c) a notice detailing a change to any information submitted in this form, other than the name or above address of the Agent for Service, no later than the 30th day after the change.
12. This Submission to Jurisdiction and Appointment of Agent for Service is governed by and construed in accordance with the laws of the local jurisdiction.



**Decisions, Orders and Rulings**

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Dated: \_\_\_\_\_

\_\_\_\_\_  
(Signature of the International Firm or authorized signatory)

\_\_\_\_\_  
(Name of signatory)

\_\_\_\_\_  
(Title of signatory)

**Acceptance**

The undersigned accepts the appointment as Agent for Service of \_\_\_\_\_ [*Insert name of International Firm*]  
under the terms and conditions of the foregoing Submission to Jurisdiction and Appointment of Agent for Service.

Dated: \_\_\_\_\_

\_\_\_\_\_  
(Signature of the Agent for Service or authorized signatory)

\_\_\_\_\_  
(Name of signatory)

\_\_\_\_\_  
(Title of signatory)

This form, and notice of a change to any information submitted in this form, is to be submitted through the Ontario Securities Commission's Electronic Filing Portal:

<https://www.osc.gov.on.ca/filings>

## APPENDIX "B"

## NOTICE OF REGULATORY ACTION

## 1. Settlement agreements

Has the firm, or any predecessors or specified affiliates<sup>1</sup> of the firm entered into a settlement agreement with any financial services regulator, securities or derivatives exchange, SRO or similar agreement with any financial services regulator, securities or derivatives exchange, SRO or similar organization?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, provide the following information for each settlement agreement:

Name of entity
Regulator/organization
Date of settlement (yyyy/mm/dd)
Details of settlement
Jurisdiction

## 2. Disciplinary history

Has any financial services regulator, securities or derivatives exchange, SRO or similar organization:

	Yes	No
(a) Determined that the firm, or any predecessors or specified affiliates of the firm violated any securities regulations or any rules of a securities or derivatives exchange, SRO or similar organization?	_____	_____
(b) Determined that the firm, or any predecessors or specified affiliates of the firm made a false statement or omission?	_____	_____
(c) Issued a warning or requested an undertaking by the firm, or any predecessors or specified affiliates of the firm?	_____	_____
(d) Suspended or terminated any registration, licensing or membership of the firm, or any predecessors or specified affiliates of the firm?	_____	_____
(e) Imposed terms or conditions on any registration or membership of the firm, or predecessors or specified affiliates of the firm?	_____	_____
(f) Conducted a proceeding or investigation involving the firm, or any predecessors or specified affiliates of the firm?	_____	_____
(g) Issued an order (other than an exemption order) or a sanction to the firm, or any predecessors or specified affiliates of the firm for securities or derivatives-related activity (e.g., cease trade order)?	_____	_____

If yes, provide the following information for each action:

Name of entity	
Type of action	
Regulator/organization	
Date of action (yyyy/mm/dd)	Reason for action
Jurisdiction	

<sup>1</sup> Terms defined in Form 33-506F6 *Firm Registration* to Ontario Securities Commission Rule 33-506 (*Commodity Futures Act*) *Registration Information* have the same meaning if used in this Appendix except that any reference to "firm" means the person or company relying on relief from the requirement to register as an adviser or dealer under the *Commodity Futures Act* (Ontario).

**3. Ongoing investigations**

Is the firm aware of any ongoing investigation of which the firm or any of its specified affiliate is the subject?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, provide the following information for each investigation:

Name of entity
Reason or purpose of investigation
Regulator/organization
Date investigation commenced (yyyy/mm/dd)
Jurisdiction

**Authorized signing officer or partner**

Name of firm
Name of firm's authorized signing officer or partner
Title of firm's authorized signing officer or partner
Signature
Date (yyyy/mm/dd)

**Witness**

The witness must be a lawyer, notary public or commissioner of oaths.

Name of witness
Title of witness
Signature
Date (yyyy/mm/dd)

This form is to be submitted through the Ontario Securities Commission's Electronic Filing Portal:

<https://www.osc.gov.on.ca/filings>

## Chapter 3

# Reasons: Decisions, Orders and Rulings

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### 3.1 OSC Decisions

#### 3.1.1 Dennis L. Meharchand and Valt.X Holdings Inc. – ss. 127(1), 127.1

IN THE MATTER OF  
DENNIS L. MEHARCHAND and  
VALT.X HOLDINGS INC.

REASONS AND DECISION ON SANCTIONS AND COSTS  
(Subsection 127(1) and section 127.1 of the  
*Securities Act*, RSO 1990, c S.5)

**Citation:** *Meharchand (Re)*, 2019 ONSEC 7

**Date:** 2019-01-30

**File No.** 2017-4

**Hearing:** December 18, 2018

**Decision:** January 30, 2019

<b>Panel:</b>	Timothy Moseley	Vice-Chair and Chair of the Panel
	Deborah Leckman	Commissioner
	Robert P. Hutchison	Commissioner

<b>Appearances:</b>	Dennis L. Meharchand	For himself and Valt.X Holdings Inc.
	Kate McGrann	For Staff of the Commission

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## REASONS AND DECISION

### I. OVERVIEW

- [1] In a merits decision dated October 19, 2018 (the **Merits Decision**),<sup>1</sup> the Ontario Securities Commission (the **Commission**) found that the respondents Dennis L. Meharchand and Valt.X Holdings Inc. (**Valt.X**; together, the **Respondents**) illegally distributed securities of Valt.X and engaged in the business of trading in securities of Valt.X without being registered.
- [2] Through these activities, the Respondents raised at least C\$1.5 million and US\$140,000 from investors. Less than C\$50,000 was returned to investors.
- [3] The Commission also found that Mr. Meharchand defrauded existing and potential investors by making false statements to them regarding the use of their funds, and by using invested funds for improper purposes.
- [4] At a first attendance to schedule the sanctions and costs hearing, Staff of the Commission (**Staff**) brought a motion for an interim order, pending the release of this decision, prohibiting the Respondents from trading in or acquiring securities, and denying the availability of exemptions provided for under Ontario securities law. We granted that order, with reasons to follow. Our reasons for that decision are set out in paragraphs [22] to [31] below.
- [5] At the sanctions and costs hearing, Staff requested an order that:
- a. the Respondents be removed permanently from Ontario's capital markets, as more particularly described below;
  - b. the Respondents be required to disgorge C\$1,450,000 and US\$140,000;
  - c. Mr. Meharchand pay an administrative penalty in the range of \$500,000 to \$700,000; and
  - d. Mr. Meharchand and Valt.X be required to pay costs of \$165,083.17 and \$110,055.45, respectively.
- [6] For the reasons that follow, we find that it is in the public interest to order:
- a. the permanent bans requested by Staff;
  - b. that the Respondents be required, jointly and severally, to disgorge C\$1,450,000 and US\$140,000; and
  - c. that Mr. Meharchand pay an administrative penalty of \$550,000.
- [7] We also find that the Respondents should be required to pay the costs requested by Staff.

### II. PRELIMINARY MATTERS

- [8] Before beginning our analysis of the appropriate sanctions and costs, we address several preliminary matters, beginning with the events leading up to the sanctions and costs hearing.

#### A. Scheduling the sanctions and costs hearing

- [9] On November 9, 2018, the Commission held a hearing to schedule the sanctions and costs hearing. At that hearing, we ordered that the sanctions and costs hearing proceed on December 19, 2018, despite Mr. Meharchand's request for more time so that he could retain counsel. The relevant facts, and our reasons for making that order, are as follows.
- [10] The Merits Decision, which was delivered to the parties on October 19, 2018, required that the parties contact the Registrar to arrange a first attendance to deal with scheduling a sanctions and costs hearing. The following day, Mr. Meharchand wrote to the Registrar and to Staff to advise that he was available any day between November 5 and 9, 2018.
- [11] By email dated October 24, 2018, the Registrar advised that the first attendance hearing would take place at 8:30am on November 9, 2018.

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<sup>1</sup> *Meharchand (Re)*, 2018 ONSC 51, (2018) 41 OSCB 8434.

- [12] On November 5, 2018, Staff wrote to the Respondents, proposing that the sanctions and costs hearing take place between December 13 and 21, 2018, with Staff's and the Respondents' materials to be delivered by November 23 and December 7, respectively.
- [13] On November 7, 2018, Mr. Meharchand replied to Staff. He proposed to retain counsel by December 21, 2018, and to deliver his materials by January 21, 2019. He also suggested that the sanctions and costs hearing take place in late February 2019. On November 8, 2018, Staff replied to Mr. Meharchand, advising that it was concerned about the delay that would result from his proposed schedule, and that the matter would be raised at the first attendance hearing the following day.
- [14] At 8:23am on November 9, seven minutes before the first attendance hearing was to begin, Mr. Meharchand sent an email to the Registrar and to Staff. In the email, Mr. Meharchand stated: "As I previously indicated [in his email of November 7 to Staff] I am no longer resident in Ontario and unable to attend in person. Please re-schedule so that I can attend via phone."
- [15] Seven minutes later, at 8:30am, the scheduled start time of the first attendance hearing, Mr. Meharchand sent another email to the Registrar and to Staff. In that email, Mr. Meharchand stated: "I wish to be represented by Counsel. Suggesting a 6 week adjournment to seek representation via the Legal Assistance program."
- [16] The hearing commenced at 8:35am in the absence of the Respondents. Staff made brief submissions to this Panel as to how Staff wished to proceed. We marked three documents as exhibits, including the two emails from Mr. Meharchand referred to above. At 8:43am, the hearing was recessed briefly so that the Registrar could attempt to contact Mr. Meharchand by telephone.
- [17] The Registrar was successful. At 8:57am, the hearing resumed with Mr. Meharchand present by telephone. Mr. Meharchand advised that he was not prepared to "discuss anything with the Commission" unless he was represented by counsel.<sup>2</sup> He stated that he wanted an opportunity to apply to the Commission's Litigation Assistance Program, which offers the services of lawyers acting *pro bono*, and through which the Respondents had received representation for attendances leading up to the merits hearing.
- [18] In response to questions from the Panel, Mr. Meharchand advised that he had not yet applied to the program for representation in connection with the sanctions and costs hearing.
- [19] After hearing submissions from the parties, we decided to fix December 18, 2018, as the date for the sanctions and costs hearing. We were not prepared to await the Respondents' retaining counsel before fixing a date, for numerous reasons:
- a. in the three weeks since Mr. Meharchand had received the Merits Decision, he had taken no steps to retain counsel;
  - b. even if the Respondents had insufficient funds to pay for counsel (a position not asserted by the Respondents), Mr. Meharchand was fully familiar with the Commission's Litigation Assistance Program, having benefited from it many months earlier, and having referred to it in his second email on November 9, 2018;
  - c. despite that familiarity, Mr. Meharchand had not applied to the program for representation in connection with the sanctions and costs hearing, and he offered no explanation for not having done so;
  - d. the content of Mr. Meharchand's two emails, the timing of those emails, the fact that the Registrar was able to reach Mr. Meharchand immediately, and the fact that Mr. Meharchand was able to participate in the hearing despite his request to "re-schedule so that [he could] attend via phone" all demonstrated to us that Mr. Meharchand was simply seeking to delay this proceeding;
  - e. Staff confirmed that for the purposes of sanctions, it would rely on the Merits Decision and the evidentiary record from the merits hearing, and would adduce no additional evidence;
  - f. it was in the public interest for this proceeding to move forward without unreasonable or unnecessary delay; and

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<sup>2</sup> Hearing transcript, *Meharchand (Re)*, November 9, 2018, at 12 line 16-17.



- g. in all the circumstances, a two-month period between the issuance of the Merits Decision and the sanctions and costs hearing allowed more than enough time for the Respondents to retain and instruct counsel, if they chose to do so.

[20] We note that at no time following the attendance on November 9, up to and including the sanctions and costs hearing on December 18, did the Respondents or anyone on their behalf suggest that the Respondents were in fact taking steps to retain counsel, through the Litigation Assistance Program or otherwise.

## **B. Interim order**

[21] The second preliminary matter arises from Staff's request that the Commission issue an interim order, pending the release of these reasons, that would restrict the Respondents' participation in the capital markets.

### **1. Background**

[22] On October 26, 2018, Staff served the Respondents, by email and by courier, with a motion record in support of Staff's request for an interim order pending the release of this decision. During the first attendance hearing on November 9, 2018, Mr. Meharchand initially claimed that he had not received the motion record. However, after a further exchange, Mr. Meharchand confirmed that he had received the motion record by email. We find that the Respondents were properly served with the motion record.

[23] Staff's requested order would, pending the release of this decision:

- a. prohibit the Respondents from trading in or acquiring any securities, pursuant to paragraphs 2 and 2.1 of subsection 127(1) of the *Securities Act*<sup>3</sup> (the **Act**); and
- b. deny the availability of any exemptions provided for under Ontario securities law, pursuant to paragraph 3 of subsection 127(1) of the Act.

[24] In support of its request, Staff relied not only on the Merits Decision, but also on evidence that the Respondents continued to solicit investments in Valt.X on the company's website since the release of the Merits Decision. Between the conclusion of the merits hearing and the release of the Merits Decision, the Respondents also continued to solicit investments in Valt.X by email.

[25] The Respondents offered no evidence to contradict the evidence presented by Staff; nor did they deny its accuracy. We accept Staff's evidence in this regard. We find that the Respondents continued to solicit investments following the conclusion of the merits hearing and following the release of the Merits Decision.

### **2. Legal framework**

[26] Subsection 127(1) of the Act lists orders that the Commission may make where it is in the public interest to do so. The Commission must exercise this jurisdiction in a manner consistent with the purposes of the Act, including the protection of investors from unfair, improper or fraudulent practices, and the fostering of fair and efficient capital markets and confidence in the capital markets.<sup>4</sup>

[27] The Supreme Court of Canada has held that the public interest jurisdiction and the orders listed in subsection 127(1) of the Act are protective and preventative and are intended to be exercised to prevent future harm to Ontario's capital markets.<sup>5</sup>

### **3. Analysis**

[28] Typically, the measures listed in subsection 127(1) of the Act are imposed either following the conclusion of a sanctions and costs hearing, or through a temporary order granted under subsection 127(5) or extended under subsections 127(7) or 127(8). Staff's request for an interim order pending the release of the sanctions and costs decision is atypical. However, the scope of section 127 permits such an order to be made. There is nothing in the section to suggest otherwise and no statutory impediment to our issuing such an order.

[29] The interim order sought by Staff would not impose sanctions for past conduct. Rather, Staff sought an order protecting investors pending a determination of what the appropriate sanctions will be. While Staff's request is not made pursuant

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<sup>3</sup> RSO 1990, c S.5.

<sup>4</sup> The Act, s 1.1.

<sup>5</sup> *Committee for Equal Treatment of Asbestos Minority Shareholders v Ontario (Securities Commission)*, 2001 SCC 37 at paras 42-43.

to the temporary order provisions in subsections 127(5), (7) and (8), we consider the purposes of such a temporary order, and of the interim order sought here, to be similar. Both forms of order seek to protect investors and the capital markets by restricting activity temporarily.

- [30] The Respondents benefitted from the same procedural protections in connection with the requested interim order as any respondent would receive relating to sanctions requested at the conclusion of a full sanctions and costs hearing. The Respondents received notice of Staff's request, and they had the opportunity to attend at and fully participate in the hearing regarding that request, including by adducing evidence and making submissions. Staff's request was properly made, at an appropriate stage of the proceeding.
- [31] As to the merits of Staff's request, given the particularly serious findings in the Merits Decision, the Respondents' apparent unwillingness to abide by Ontario securities law, and the risk to investors and the capital markets, we concluded that it was in the public interest to issue the order sought.

**C. Respondents' participation in the sanctions and costs hearing**

- [32] The sanctions and costs hearing proceeded as scheduled on December 18, 2018. Mr. Meharchand participated, at least initially, by telephone.
- [33] Staff began by filing an affidavit that established proper service on the Respondents of Staff's written submissions, authorities, and affidavit evidence relating to costs. In an email sent to Staff and to the Registrar in the early morning hours of December 18, and at the sanctions and costs hearing itself, Mr. Meharchand claimed not to have received the materials.
- [34] We reject Mr. Meharchand's assertion. He claimed that the email address used by Staff "is not approved in our system for receiving emails", even though he previously exchanged emails with Staff at that same address. He also previously denied receiving emails relating to this proceeding, even though that denial also proved to be untrue (see paragraph [22] above). Further, despite knowing that Staff was required to serve materials by November 23, Mr. Meharchand did not attempt to contact Staff to find out where those materials were. Finally, Mr. Meharchand asserted in the hearing that he had asked Staff to serve him at a business location in the United States of America; however, he offered no evidence of that request and Staff advised that no such request was received. We find that he indeed received Staff's materials in a timely way.
- [35] Following that discussion with the Panel, Mr. Meharchand advised that he would not participate any further, stating "You can continue without me."<sup>6</sup> He disconnected from the telephone call. At the Panel's request, the Registrar immediately sent an email to the Respondents, advising that the line would remain open should Mr. Meharchand wish to call back. The hearing proceeded in his absence and concluded without Mr. Meharchand rejoining the call.
- [36] The Respondents did not file written submissions. Mr. Meharchand disconnected from the call without making any oral submissions regarding specific sanctions or Staff's request for costs. We were therefore left without any submissions on the Respondents' behalf.

**D. Representation of Valt.X**

- [37] The final preliminary matter relates to the representation of Valt.X in this proceeding.
- [38] At the beginning of the merits hearing on May 14, 2018, Mr. Meharchand explicitly confirmed that he was representing Valt.X at the hearing.<sup>7</sup>
- [39] No contrary advice was provided to the Commission, by Mr. Meharchand or anyone else, at any time, until November 10, 2018, the day following the first attendance hearing. Upon receipt of the Commission's order resulting from that attendance, Mr. Meharchand sent an email to the Registrar and to Staff, advising "yet again that At [sic] no time in any of the Hearings have I represented Valt.X Holdings Inc.". This assertion was clearly incorrect.
- [40] At the beginning of the sanctions and costs hearing, Mr. Meharchand explicitly confirmed that he was representing Valt.X at that hearing,<sup>8</sup> although as noted above, Mr. Meharchand disconnected from the call shortly thereafter.

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<sup>6</sup> Hearing transcript, *Meharchand (Re)*, December 18, 2018, at 9 line 27.

<sup>7</sup> Hearing transcript, *Meharchand (Re)*, May 14, 2018, at 5 line 27.

<sup>8</sup> Hearing transcript, *Meharchand (Re)*, December 18, 2018, at 6 line 21.

### III. ANALYSIS – SANCTIONS

[41] We turn now to consider what sanctions would be in the public interest.

#### A. Introduction

[42] The sanctions listed in subsection 127(1) of the Act are protective and are intended to be exercised to prevent future harm to Ontario's capital markets.

[43] The Commission has identified a non-exhaustive list of factors to be considered with respect to sanctions generally, including the seriousness of the misconduct, the size of the profit made from the illegal conduct, any mitigating factors, and the likely effect that any sanction would have on the respondent ("specific deterrence") as well as on others ("general deterrence"). Sanctions must be proportionate to the respondent's conduct in the circumstances of the case.<sup>9</sup>

#### B. Contraventions of the Act

##### 1. Illegal distribution of securities

[44] The requirement to provide sufficient disclosure to those who are investing in securities is a cornerstone of Ontario securities law. The delivery of a proper prospectus that reviews the risks associated with an investment helps investors make an informed decision about that investment.<sup>10</sup>

[45] In this case, the Respondents traded in securities of Valt.X, where such trades were distributions. No prospectus was ever filed or delivered. The distributions, which were contrary to subsection 53(1) of the Act, raised at least C\$1.5 million and US\$140,000 from more than 100 investors.

[46] The Respondents attempted to avail themselves of the accredited investor exemption from the prospectus requirement. However, as the Commission found in the Merits Decision, the Respondents relied entirely on the investors' self-certification as to their own qualifications as accredited investors. The Respondents undertook no inquiry to assess whether a particular investor's circumstances were sufficient to justify that investor not receiving prospectus disclosure. The accredited investor exemption was therefore improperly relied upon by the Respondents.

##### 2. Engaging in the business of trading securities without being registered

[47] Registration is another cornerstone of Ontario securities law. It protects investors and promotes confidence in the capital markets by seeking to ensure that those who sell or promote securities are proficient and solvent and that they act with integrity. When an unregistered individual or firm engages in activity that requires registration, the individual or firm defeats some of the necessary legal protections, shields the activity somewhat from regulatory monitoring, puts investors at risk, and undermines the integrity of the capital markets.

[48] The Commission found that the Respondents engaged in the business of trading in securities of Valt.X, without being registered, contrary to subsection 25(1) of the Act. The Respondents did so regularly and continuously over many years.

##### 3. Fraud

[49] Mr. Meharchand engaged in fraudulent conduct contrary to clause 126.1(1)(b) of the Act, by making false statements to existing and potential investors about the use to which invested funds would be put, and by using invested funds for improper purposes. In doing so, he knowingly put investors' funds at risk.

[50] Specifically, the Commission found in the Merits Decision that:

- a. Mr. Meharchand actively and repeatedly solicited investor funds over a number of years;
- b. contrary to Mr. Meharchand's representations, the Respondents did not meaningfully carry on a legitimate cybersecurity business during the relevant time period;

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<sup>9</sup> *Bradon Technologies Ltd (Re)*, 2016 ONSEC 19, (2016) 39 OSCB 4907 at para 28; and at para 47, citing *Cartaway Resources Corp (Re)*, 2004 SCC 26 at para 60.

<sup>10</sup> *M P Global Financial Ltd (Re)*, 2011 ONSEC 22, (2011) 34 OSCB 8897 at para 117.

- c. Mr. Meharchand used investor funds to bet on horses, to pay the mortgage on his home, to pay credit card bills, to satisfy what he claimed were debts owing to him, and for other unknown and undocumented purposes;
- d. Mr. Meharchand adduced no documentary evidence, and no reliable oral evidence, to establish that investor funds were used for legitimate purposes;
- e. as Mr. Meharchand admitted, he routinely commingled investor funds with his own personal funds; and
- f. Mr. Meharchand's activities resulted in a loss of virtually all of the investor funds.

[51] The circumstances of this case amply demonstrate why the Commission has consistently held that fraud is "one of the most egregious securities regulatory violations".<sup>11</sup> Typically, fraudulent activity causes direct and immediate harm to its victims, many of whom entrust a substantial portion of their savings to those who abuse that trust. Fraud significantly undermines confidence in the capital markets and therefore has wide-ranging negative effects on investor interests and on capital formation.

[52] Mr. Meharchand's conduct showed callous disregard for the financial security of existing and potential investors in Valt.X.

### **C. Application of the relevant factors**

[53] The misconduct in this case was very serious. It was recurring, it extended over many years, and it affected many investors. The manner in which the Respondents raised funds denied investors the protections to which they were entitled. In addition, the Respondents exerted pressure on potential investors, both by imposing artificial deadlines for investment opportunities, and by urging investors to borrow against their homes to invest in the CrowdBuy program.

[54] We consider the Respondents' admitted and cavalier commingling of funds, the absence of any records, and the failure to engage even rudimentary bookkeeping assistance, to be aggravating circumstances that increase the seriousness of the misconduct. These factors preclude a reliable and complete accounting of the extent of investor losses. The Respondents ought not to be able to benefit from the uncertainty that they themselves created.

[55] As explained above, Mr. Meharchand's conduct was particularly serious, given its fraudulent nature and his callous disregard for investors' interests.

[56] As a result of the Respondents' misconduct, they obtained at least C\$1.5 million and US\$140,000 from investors. That is a significant sum. Less than \$50,000 was returned to investors.

[57] Mr. Meharchand expressed no remorse. While there is no obligation on a respondent to express remorse, and a respondent's failure to express remorse is not an aggravating factor, we note the absence of remorse in this case. Mr. Meharchand has neither recognized the seriousness of his misconduct nor shown any concern for the harm he has caused.

[58] There are no mitigating factors.

### **D. Sanctions sought by Staff**

#### **1. Introduction**

[59] Staff seeks market bans, disgorgement of the funds obtained by the Respondents and an administrative penalty.

#### **2. Market bans**

[60] Staff asks that the Commission:

- a. permanently prohibit the Respondents from acquiring or trading in securities or derivatives;
- b. order that the exemptions contained in Ontario securities law shall not apply to the Respondents permanently;

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<sup>11</sup> *Al-Tar Energy Corp (Re)*, 2010 ONSC 11, (2010) 33 OSCB 5535 at para 214, quoting D. Johnston & K.D. Rockwell, *Canadian Securities Regulation*, (4<sup>th</sup> ed., Markham: LexisNexis, 2007) at 420.

- c. require Mr. Meharchand to resign any position he holds as a director or officer of an issuer, registrant or investment fund manager, and prohibit him from ever holding any such position; and
- d. permanently prohibit Mr. Meharchand from becoming or acting as a registrant, as an investment fund manager or as a promoter.

- [61] Participation in the capital markets is a privilege, not a right.<sup>12</sup> Staff's requested order would essentially deny that privilege to the Respondents.
- [62] The Commission's role is to deny that privilege where it concludes, based on a respondent's past conduct, that the respondent's continued participation in the capital markets "may well be detrimental to the integrity of [the] capital markets."<sup>13</sup>
- [63] Mr. Meharchand's egregious and fraudulent conduct, and his refusal to accept responsibility for his actions, lead us to conclude that he cannot be trusted to participate in those markets in any way. His conduct demonstrates a serious risk to the public.
- [64] As the Commission has found in similar circumstances,<sup>14</sup> only a permanent removal from the capital markets would be proportionate to the type of misconduct found in this case, would be sufficient to protect investors from Mr. Meharchand, and would deliver the necessary deterrent message to others who might contemplate similar misconduct.
- [65] We note Staff's requested order would refer explicitly to both "registrants" and to "investment fund managers". We adopt the Commission's reasons in *Inverlake Property Investment Group Inc (Re)*<sup>15</sup> and *Vantooren (Re)*,<sup>16</sup> in which the Commission found such a distinction unnecessary, given that the definition of "registrant" in subsection 1(1) of the Act includes an investment fund manager, by virtue of subsection 25(4) of the Act. As a result, the order we shall issue refers to registrants, which term includes investment fund managers.

### 3. Disgorgement

- [66] Paragraph 10 of subsection 127(1) of the Act provides that if "a person or company has not complied with Ontario securities law", the Commission may, if it determines it to be in the public interest to do so, issue "an order requiring the person or company to disgorge to the Commission any amounts obtained as a result of the non-compliance."
- [67] The purpose of a disgorgement order is not to provide restitution; rather, it is a remedy that seeks to prevent wrongdoers from benefiting from their breaches of Ontario securities law, and to deter those wrongdoers and others from engaging in similar misconduct.<sup>17</sup>
- [68] While the Commission is authorized to order disgorgement of the full amount obtained by respondents, it need not do so. The Commission has set out various factors that it will take into account in determining whether a disgorgement order is appropriate, and if so, in what amount:
- a. whether an amount was obtained by a respondent as a result of the non-compliance with Ontario securities law;
  - b. the seriousness of the misconduct and whether that misconduct caused serious harm, whether directly to original investors or otherwise;
  - c. whether the amount obtained as a result of the non-compliance is reasonably ascertainable;
  - d. whether those who suffered losses are likely to be able to obtain redress; and
  - e. the deterrent effect of a disgorgement order on the respondents and on other market participants.<sup>18</sup>

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<sup>12</sup> *Erikson v Ontario (Securities Commission)*, 2003 CanLII 2451, [2003] OJ No 593 (Div Ct) at paras 55-56.

<sup>13</sup> *Mithras Management Ltd (Re)* (1990), 13 OSCB 1600 at 1610-11.

<sup>14</sup> *2196768 Ontario Ltd (Re)*, 2015 ONSEC 9, (2015) 38 OSCB 2374 at para 51; *Lyndz Pharmaceuticals Inc (Re)*, 2012 ONSEC 25, (2012) 35 OSCB 7357 (*Lyndz*) at para 80.

<sup>15</sup> *Inverlake Property Investment Group Inc (Re)*, 2018 ONSEC 35, (2018) 41 OSCB 5309 at para 39.

<sup>16</sup> *Vantooren (Re)*, 2018 ONSEC 36, (2018) 41 OSCB 5603 at para 30.

<sup>17</sup> *Pro-Financial Asset Management (Re)*, 2018 ONSEC 18, (2018) 41 OSCB 3512 (*PFAM*) at para 48.

<sup>18</sup> *PFAM* at para 56.

[69] We will now apply each of those factors to the circumstances of this case.

**(a) Did the Respondents obtain an amount as a result of the non-compliance with Ontario securities law?**

[70] In the Merits Decision, the Commission found that the Respondents obtained investor funds in a manner that contravened Ontario securities law. We therefore conclude that both Respondents may be subject to a disgorgement order in respect of the funds raised.

**(b) Seriousness of the misconduct and whether the misconduct caused serious harm**

[71] As noted above, the Respondents' conduct was very serious. Mr. Meharchand perpetrated a fraud on investors, and the misconduct of both Respondents caused investors to lose virtually all of their funds.

**(c) Is the amount obtained as a result of the non-compliance reasonably ascertainable?**

[72] As Mr. Meharchand admitted, his personal funds and those of Valt.X were commingled. There are no records that would permit a proper accounting. While the absence of records precludes a precise accounting, the evidence does clearly establish that the amounts obtained were at least C\$1.5 million and US\$140,000. Staff limits its requested disgorgement order to those amounts, less C\$50,000 that was returned to investors.

**(d) Are those who suffered losses likely to be able to obtain redress?**

[73] The onus does not lie on Staff to demonstrate that victims of misconduct are unlikely to obtain redress. The difficulties inherent in such a determination would impose a burden that is inconsistent with the Commission's investor protection mandate. Rather, if the Respondents were to show that those who suffered losses are likely to obtain redress, the Commission might reduce the disgorgement amount, or not order any disgorgement at all.<sup>19</sup>

[74] The Respondents adduced no such evidence.

**(e) Deterrent effect on the Respondents and others**

[75] It is essential both for the protection of investors and for the promotion of confidence in the capital markets that those entrusted with investor money strictly adhere to sound practices that reflect the importance of that trust.

[76] The Respondents disregarded their obligations to investors in Valt.X. Their repeated, deliberate and dishonest conduct, and the need to deter them and others from engaging in similar conduct, require us to demonstrate unequivocally, to the Respondents and others, that such behaviour is unacceptable. It is in the public interest to require the Respondents, jointly and severally, to disgorge the sums of C\$1,450,000 and US\$140,000, being the amount that the Respondents obtained as a result of their contraventions of sections 25 and 53 of the Act less the amount of funds returned to investors.

**4. Administrative penalty**

[77] Staff proposes an administrative penalty of between \$500,000 and \$700,000 against Mr. Meharchand. Staff submits that an administrative penalty in this range would be appropriate and proportionate due to the seriousness of the breaches and the fact that the breaches, including the fraud, occurred over a prolonged period of time.

[78] The Commission has stated in previous decisions that the purpose of administrative penalties is to "deter the particular respondents from engaging in the same or similar conduct in the future and to send a clear deterrent message to other market participants that the conduct in question will not be tolerated in Ontario capital markets."<sup>20</sup> Thus, the Commission intends that administrative penalties will achieve both specific and general deterrence.

[79] In support of its position, Staff directed our attention in particular to six previous decisions of the Commission.

[80] In *Maple Leaf Investment Fund Corp (Re) (Maple Leaf)*,<sup>21</sup> an individual respondent engaged in unregistered trading and illegal distribution of securities of a corporate respondent. The two respondents purported to rely on the accredited investor exemption but made no effort to determine whether the investors were qualified. They also perpetrated a fraud on the investors by providing false information regarding the use of investor funds and the activities of the corporate respondent. Of the \$4.5 million that the respondents raised from 80 investors over a period of 19 months, \$1.3 million

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<sup>19</sup> PFAM at para 70.

<sup>20</sup> *Limelight Entertainment Inc (Re)*, 2008 ONSC 28, (2008) 31 OSCB 12030 at para 67.

<sup>21</sup> *Maple Leaf Investment Fund Corp (Re)*, 2012 ONSC 8, (2012) 35 OSCB 3075.

was returned to investors. The Commission ordered that the individual respondent pay an administrative penalty of \$450,000.<sup>22</sup>

- [81] We note that *Maple Leaf* did involve an additional breach not applicable in this case, i.e., making prohibited representations to potential investors about a future listing on a stock exchange.
- [82] In *Lyndz*, the Commission imposed administrative penalties of \$500,000 and \$600,000 on two individual respondents, following findings that the corporate respondent had no true underlying business, and that the individual respondents had fraudulently used a substantial portion of the approximately \$2.1 million raised from investors for personal expenses. The respondents' activities in *Lyndz* extended over ten years, involving investors in Ontario and the United Kingdom.
- [83] *New Found Freedom Financial (Re)*<sup>23</sup> resulted in administrative penalties of \$250,000 against each of two individual respondents who persuaded investors to advance funds for foreign exchange trading on the promise of unrealistic returns. Instead, the respondents used the funds to pay earlier investors and themselves. The Commission found that the respondents had engaged in the business of trading in securities and had conducted illegal distributions, through which they perpetrated a fraud, depriving investors of at least \$1.1 million.
- [84] In *Bradon Technologies Ltd (Re) (Bradon)*,<sup>24</sup> the Commission found that the two individual respondents had perpetrated a fraud on investors by purporting to sell securities of one of the corporate respondents to at least 46 investors, causing a net aggregate loss to those investors of approximately \$1.6 million. In doing so, the respondents engaged in the business of trading securities without being registered, and illegally distributed those securities. As in *Maple Leaf*, the *Bradon* respondents committed a breach not present in this case, i.e., making a prohibited representation regarding listing on an exchange. The Commission imposed administrative penalties of \$500,000 and \$300,000 on the individual respondents, taking into account the differing extent of each respondent's contact with investors.
- [85] *Portfolio Capital Inc (Re) (Portfolio)*<sup>25</sup> also involved respondents who engaged in the business of trading securities without being registered and who conducted illegal distributions of securities. The respondents raised approximately US\$980,000 and C\$544,000 from more than 200 investors over almost five years. Even though the *Portfolio* respondents were not found to have defrauded investors, the Commission imposed administrative penalties of \$500,000 and \$150,000 on the two individual respondents. Once again, the differing amounts reflected the role that each respondent played.
- [86] Finally, the respondents in *Black Panther Trading Co*<sup>26</sup> raised more than \$425,000 from 16 individuals, on promises to invest the funds and produce specified returns. Instead, the respondents fraudulently used the funds to pay earlier investors and family members, or for personal expenses. The Commission ordered that the respondents be jointly and severally liable for an administrative penalty of \$300,000.
- [87] In our view, given the seriousness of Mr. Meharchand's misconduct, an administrative penalty of \$550,000 is proportionate, is sufficient to act as a specific and general deterrent, and is appropriate in all the circumstances. That amount lies within the range of the administrative penalties referred to above. Its location toward the high end of that range reflects the aggravating factors we have cited.

#### IV. ANALYSIS – COSTS

##### A. Introduction

- [88] We turn now to consider Staff's request that the Respondents pay some of the costs associated with this matter.
- [89] Given the Commission's finding that the Respondents did not comply with Ontario securities law, section 127.1 of the Act empowers the Commission to order them to pay the costs of the investigation and/or hearings in this matter. Such an order is not a sanction; instead it allows the Commission to recover some of the costs expended in connection with the investigation and hearings.

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<sup>22</sup> *Maple Leaf* at para 44.

<sup>23</sup> *New Found Freedom Financial (Re)*, 2013 ONSEC 26, (2013) 36 OSCB 6758.

<sup>24</sup> *Bradon Technologies Ltd (Re)*, 2016 ONSEC 19, (2016) 39 OSCB 4907.

<sup>25</sup> *Portfolio Capital Inc (Re)*, 2015 ONSEC 27, (2015) 38 OSCB 7357.

<sup>26</sup> *Black Panther Trading Co (Re)*, 2017 ONSEC 8, (2017) 40 OSCB 3727.

**B. Relevant factors**

- [90] The issues at stake in this proceeding are important. While there is little about the Respondents' conduct that was novel or precedent-setting, the misconduct that occurred was very serious and had a significant effect on numerous investors. It was important that there be an appropriate regulatory response.
- [91] There was nothing about Staff's conduct that unduly lengthened the proceeding. The Commission found that the Respondents contravened the Act in all of the ways alleged by Staff. Both of Staff's witnesses were required in order to prove Staff's case, and Staff delivered both witnesses' evidence in writing, greatly contributing to a shorter hearing.
- [92] We do not find the Respondents' conduct during this proceeding to be a relevant factor in determining costs. While we have been critical of that conduct when addressing adjournment requests and evidentiary issues, we recognize that the Respondents were unrepresented by counsel for some of the preliminary attendances and throughout the merits hearing. Staff does not seek an adjustment to whatever costs order we might otherwise make, based on the Respondents' conduct. We need not make any such adjustment.

**C. Staff's request**

- [93] Staff submitted evidence supporting total costs of the investigation and proceeding in this matter of \$892,629.47. That sum is made up of Staff time of \$880,412.50 and disbursements of \$12,216.97. The amount for Staff time is based on hourly rates previously approved by the Commission, and excludes, among other things, time spent by law clerks, students-at-law, and members of Staff who recorded 35 or fewer hours on the file.
- [94] Staff seeks costs of \$275,138.62, which represents a discount of 69% from the total recorded. Staff submits that the total should be divided so that Mr. Meharchand and Valt.X pay costs of \$165,083.17 and \$110,055.45, respectively. These amounts are 60% and 40% of the total, based on three contraventions having been proven against Mr. Meharchand (being engaged in the business of trading, illegal distributions, and fraud), and two contraventions having been proven against Valt.X (being engaged in the business of trading, and illegal distributions).

**D. Conclusion as to costs**

- [95] The total amount sought by Staff is both appropriate and proportionate. It reflects a significant discount from the total costs recorded, but adequately respects the principle that wrongdoers ought to pay some portion of the costs associated with investigations and proceedings.
- [96] In our view, Staff's proposed basis for apportionment of costs between the two Respondents is reasonable. We will therefore make the order requested.

**V. CONCLUSION**

- [97] For the reasons set out above, we shall issue an order as follows:
- a. pursuant to paragraph 2 of subsection 127(1) of the Act, trading in any securities by the Respondents shall cease permanently;
  - b. pursuant to paragraph 2.1 of subsection 127(1) of the Act, the Respondents are prohibited permanently from acquiring securities;
  - c. pursuant to paragraph 3 of subsection 127(1) of the Act, the exemptions contained in Ontario securities law shall not apply to the Respondents permanently;
  - d. pursuant to paragraphs 7 and 8.1 of subsection 127(1) of the Act, Mr. Meharchand shall resign any positions he holds as a director or officer of an issuer or a registrant;
  - e. pursuant to paragraphs 8 and 8.2 of subsection 127(1) of the Act, Mr. Meharchand is prohibited permanently from becoming or acting as a director or officer of any issuer or registrant;
  - f. pursuant to paragraph 8.5 of subsection 127(1) of the Act, Mr. Meharchand is prohibited permanently from becoming or acting as a registrant or as a promoter;
  - g. pursuant to paragraph 9 of subsection 127(1) of the Act, Mr. Meharchand shall pay an administrative penalty of \$550,000, which amount shall be designated for allocation or use by the Commission in accordance with subclause 3.4(2)(b)(i) or (ii) of the Act;



- h. pursuant to paragraph 10 of subsection 127(1) of the Act, the Respondents shall be required, jointly and severally, to disgorge to the Commission the sums of C\$1.45 million and US\$140,000, which amounts shall be designated for allocation or use by the Commission in accordance with subclause 3.4(2)(b)(i) or (ii) of the Act;
- i. pursuant to section 127.1 of the Act, Mr. Meharchand shall pay costs of \$165,083.17 to the Commission; and
- j. pursuant to section 127.1 of the Act, Valt.X shall pay costs of \$110,055.45 to the Commission.

Dated at Toronto this 30th day of January, 2019.

“Timothy Moseley”

“Deborah Leckman”

“Robert P. Hutchison”

**3.1.2 Benedict Cheng et al.**

**IN THE MATTER OF  
BENEDICT CHENG,  
FRANK SOAVE,  
JOHN DAVID ROTHSTEIN and  
ERIC TREMBLAY**

**REASONS AND DECISION**

**Citation:** *Cheng (Re)*, 2019 ONSC 8

**Date:** 2019-02-04

**File No.** 2017-13

**Hearing:** September 4, 6, 7, 10, 11, 13, 14, 18, 21, 24 and November 9, 2018

**Decision:** February 4, 2019

<b>Panel:</b>	Philip Anisman	Commissioner and Chair of the Panel
	Deborah Leckman	Commissioner
	Robert P. Hutchison	Commissioner

<b>Appearances:</b>	Yvonne B. Chisholm	For Staff of the Commission
	Jennifer M. Lynch	
	Christina C. Galbraith	
	Ryan M. Lapensee (student-at-law)	

David Hausman	For the respondent, Frank Soave
Brad Moore	
Jonathan Wansbrough	

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APPENDIX CHRONOLOGY OF EVENTS, JUNE 11-13, 2014

## REASONS AND DECISION

## I. INTRODUCTION

- [1] The fair and efficient operation of securities markets requires timely disclosure of information that is likely to affect the value of securities that are traded so that investors have equal access to it when they make investment decisions. Trading by persons who have material information about an issuer that is not generally available to investors is inconsistent with this goal; it erodes market integrity and confidence in the fairness of our securities market.
- [2] Accordingly the *Securities Act* (Ontario) (the **Act**) prohibits any “person in a special relationship with an issuer” whose securities are publicly traded from purchasing or selling the issuer’s securities with knowledge of a material fact with respect to the issuer that has not been generally disclosed.<sup>1</sup> As information is easily transmissible, the Act also prohibits a person in a special relationship from informing another person (a **tippee**) of an undisclosed material fact, except in the necessary course of business, and includes the tippee as a “person in a special relationship” so that the tippee cannot trade with or further disseminate the information.
- [3] A “special relationship” thus includes persons in a direct relationship with an issuer, such as directors, officers, employees and persons conducting business with the issuer, and a potentially unending chain of tippees and subtippees. To avoid catching persons who trade innocently, the definition of “person in a special relationship with an issuer” includes only tippees who know or reasonably ought to know that their informer is in a special relationship with the issuer.<sup>2</sup>
- [4] As knowledge is subjective, direct evidence of knowledge is often not available, and proof of insider trading and a person’s status as a tippee must be based on circumstantial evidence. For this reason, and because information may be conveyed in many, sometimes subtle ways, it may be difficult for staff of the Commission (**Staff**) to prove improper insider trading, especially by a tippee.
- [5] This proceeding, relating to the purchase by the respondent, Frank Soave, of shares in Amaya Gaming Group Inc. (**Amaya**) shortly before it announced an acquisition that would make it the world’s largest online gaming company (the **Acquisition**), provides an example of this difficulty. Staff allege that John David Rothstein, an officer of Aston Hill Asset Management Inc. (**AHAM**) which was participating in the financing of Amaya’s Acquisition, informed Mr. Soave of AHAM’s participation and the imminent announcement of the Acquisition and that Mr. Soave purchased 5,000 shares of Amaya following receipt of this information, which he sold the day after the announcement at a profit of \$38,166.<sup>3</sup> For the reasons that follow, the Commission hearing panel (the **Panel**) have concluded that Staff have not proved that Mr. Soave knew or should have known that Mr. Rothstein was in a special relationship with Amaya when he purchased the shares and that the case against him must be dismissed.

## II. BACKGROUND

## A. Amaya’s Acquisition

- [6] At 9:24 p.m. on June 12, 2014, Amaya announced that it had reached an agreement to acquire Oldford Group Limited (**Oldford**), the parent company of Rational Group Ltd., the world’s largest poker business, which owned PokerStars, the world’s largest online poker site, for cash consideration of US\$4.9 billion.<sup>4</sup> The purchase price was to be financed through a combination of (i) cash on hand, (ii) senior secured credit facilities of US\$2.1 billion underwritten by three large banks, (iii) US\$800 million senior secured term loans from these banks and affiliates of GSO Capital Partners LP (**GSO**), the credit division of The Blackstone Group (**Blackstone**), and an investment manager subsequently identified as BlackRock Financial Management, Inc. (**BlackRock**), and (iv) a convertible preferred share private placement of US\$1 billion in which GSO and the investment manager would participate. Amaya would also receive (v) \$500 million through the issuance, in an underwritten bought-deal private placement, of subscription rights priced at \$20 and convertible into common shares on a one-for-one basis upon completion of the Acquisition, with an additional \$140 million underwriter’s option, and (vi) a commitment from GSO to purchase common shares for gross proceeds of up to US\$55 million.

<sup>1</sup> RSO 1990, c S.5, s 76(1). The section says “knowledge of a material fact or material change”. A material change relates to an issuer’s timely disclosure obligations and is invariably a material fact as well; see *AiT Advanced Information Technologies Corp (Re)*, 2008 ONSEC 3, (2008) 31 OSCB 712 at paras 209-215 (**AiT**). As the distinction between the two is not relevant in this proceeding, these reasons use only “material fact”.

<sup>2</sup> Act, s 76(5) “person in a special relationship” (e).

<sup>3</sup> They also allege that Mr. Soave made misrepresentations to Staff in a compelled examination, when he denied these allegations.

<sup>4</sup> Unless otherwise indicated, all references to currency in these reasons are to Canadian dollars.

- [7] At the time of the announcement, Amaya's business was primarily providing technology-based gaming solutions to the regulated gaming industry, with an online poker outlet that was ranked nearly 30th in online poker traffic. The Acquisition would make it the world's largest publicly traded online gaming company, would provide strong cash flow from its combined operations, and was expected immediately to increase its combined earnings significantly.
- [8] Discussions leading to the announcement began over six months earlier, in December, 2013, and Amaya, Oldford and holders of a majority of its shares entered a letter of intent on January 13, 2014. In the six months leading up to the announcement, the parties to the proposed agreement conducted due diligence and negotiated the terms of the Acquisition and its financing, and the underwriter sought purchasers of the subscription rights.
- [9] During this period there was speculation among analysts and in blogs about Amaya's prospects and a possible acquisition. Analysts commented on Amaya having pursued an acquisition strategy in developing its business. In late May, rumours of the possibility of an acquisition of PokerStars were published on websites and in market blogs, accompanied by increases in the market price and trading volume of Amaya shares. In response to these rumours and trading activity, Amaya published a press release on May 26, 2014 stating that while acquisitions were a part of its growth strategy, it did not publicly comment on potential acquisitions before there was a binding legal agreement and that it would not comment further on the current rumours unless and until comment was warranted.
- [10] Between May 26 and June 10, 2014, Amaya's shares traded between approximately \$10 and \$11 with relatively consistent trading volumes. On June 11, the volume increased substantially and its shares closed at just over \$12.
- [11] On June 12, Bloomberg News Service published an article (the **Bloomberg Article**) at 9:07 a.m. announcing a \$1 billion financing by Blackstone for an acquisition by an existing client that would make the client a global player in its industry; this information was repeated in an email from a blog known as "SeekingAlpha.com" (**SeekingAlpha**) sent at 10:15 a.m. Mr. Soave purchased 5,000 shares of Amaya for \$60,755 (\$12.15 per share) at 10:35 a.m. The price of Amaya's shares rose to \$14.08 by 12:22 p.m., when trading was halted by the Investment Industry Regulatory Organization of Canada (**IIROC**). Amaya published its press release announcing the Acquisition that evening, and its shares opened the following day at \$19.05 and closed at \$20, the offering price of Amaya's subscription rights.

**B. AHAM and Mr. Rothstein**

- [12] On April 29, 2014, AHAM signed a non-disclosure agreement to enable it to receive information about and participate in the private placement of Amaya's subscription rights for common shares. AHAM was a registered investment fund manager, exempt market dealer and portfolio manager specializing in mutual funds. It managed its own funds and third-party mutual funds under a subadvisory contract with Industrial Alliance Clarington (**Clarington**), a mutual fund company.
- [13] AHAM was a subsidiary of Aston Hill Financial Inc. (**AHF**), a financial company that managed, marketed, distributed and administered mutual funds, private equity funds, hedge funds, segregated institutional funds and other investment products.
- [14] Benedict Cheng, a respondent in this proceeding, was the president and chief investment officer of AHF and the co-chief investment officer at AHAM and was responsible for managing AHAM's staff. He was registered as a portfolio manager, managed the Clarington mutual funds and authorized the signing of the non-disclosure agreement by AHAM; he also supervised the management of other funds and the general operations of AHAM. In June, 2018, Mr. Cheng entered a settlement agreement with Staff in which he admitted that he told Mr. Rothstein of the Acquisition and suggested that Mr. Rothstein inform Mr. Soave.<sup>5</sup> He testified as a Staff witness at the hearing.
- [15] AHAM's president was Michael Killeen, a lawyer, who was also AHF's chief operating officer. Mr. Killeen was a Staff witness at the hearing.
- [16] The chief executive officer and chair of AHF was Eric Tremblay. Mr. Tremblay was also the chair of Argent Energy Trust (**Argent**), a public trust that held oil and gas assets, whose units traded on the Toronto Stock Exchange. AHF was responsible for Argent's general administration; Mr. Tremblay was in charge of AHF's management and administration contract with Argent and his primary responsibility as CEO and chair of AHF was dealing with Argent. Mr. Tremblay also entered a settlement agreement with Staff in this proceeding.
- [17] John David Rothstein was AHAM's senior vice president and national sales manager. Mr. Rothstein managed AHAM's internal and external sales teams and reported to Mr. Cheng. His primary functions were to act as a "wholesaler", engaging with investment advisers, mainly in the greater Toronto area, to encourage them to invest funds they managed for clients in AHAM's mutual funds. To this end, he facilitated contact between AHAM's portfolio managers

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<sup>5</sup> Exhibit 240, Settlement Agreement with Mr. Cheng; (2018) 41 OSCB 5131.

and these investment advisers by arranging meetings in which AHAM portfolio managers would discuss the market, AHAM's mutual funds and their favourite securities holdings. These meetings occurred at the offices of the investment advisers and at lunches and dinners elsewhere. If an investment adviser was interested in information on an issuer covered by the portfolio managers, Mr. Rothstein attempted to ensure that a portfolio manager addressed the investment adviser's questions. He also conveyed recommendations and analyses of portfolio managers to these advisers in emails and orally.

- [18] Mr. Rothstein was interviewed by Staff in compelled examinations pursuant to a summons under section 13 of the Act on three occasions. On June 15, 2016, in his first interview, although he admitted that he might have given Mr. Soave a "heads up", he denied having been told of the Acquisition by Mr. Cheng and denied any knowledge of Mr. Soave's purchase of Amaya shares. In his second interview, on January 24, 2017, he admitted that he lied in his first interview, that Mr. Cheng had told him about the Acquisition and told him to inform Mr. Soave and that he did so in a telephone conversation on June 12, 2014. On April 12, 2017, Mr. Rothstein entered a settlement agreement with Staff based on his evidence in this interview.<sup>6</sup> In his third interview, on October 23, 2017, Mr. Rothstein corrected his statement that he spoke to Mr. Soave and other statements in his second interview and in his settlement agreement.

### C. The Respondent

- [19] Mr. Soave was a registered investment adviser and vice president at CIBC World Markets Inc. (**CIBC**) who was initially registered in 1986. He joined CIBC's Thornhill branch in 2001. In June, 2014, he had assets under management of approximately \$175 million, most of which were invested in managed funds, including AHAM's mutual funds. Other than in this matter, he has not been the subject of discipline by an employer or of a regulatory proceeding.
- [20] Mr. Soave had known Mr. Rothstein for over ten years and had recommended him to Mr. Cheng for his position with AHAM. CIBC's Thornhill branch was Mr. Rothstein's most significant firm by holdings and Mr. Soave was Mr. Rothstein's most significant investment adviser.

### D. The Tip

- [21] Mr. Soave had invested approximately \$1 million of his clients' money and had invested personally in Argent on the basis of a presentation by Mr. Tremblay. Other investment advisers at the CIBC Thornhill branch also invested in Argent. In 2014 Argent's securities deteriorated significantly; Mr. Soave and other investment advisers in his branch became dissatisfied with their investment and with the information they were receiving from Mr. Tremblay. Mr. Soave, particularly, expressed strong dissatisfaction to Mr. Rothstein, who was concerned that Mr. Soave would cease to invest in and withdraw his investments from AHAM's mutual funds because of Mr. Tremblay's association with AHAM.
- [22] Mr. Rothstein expressed these concerns to Mr. Cheng. As a result, Mr. Cheng told Mr. Rothstein of Amaya's impending Acquisition and suggested he tell Mr. Soave and the other investment advisers at his branch to purchase shares in Amaya. Mr. Cheng testified that he told Mr. Rothstein in late May or early June; Mr. Rothstein testified that he received the information on or about June 11, as he himself purchased Amaya shares immediately after he received the information from Mr. Cheng. While it is likely Mr. Rothstein's recollection is accurate, when he received this information is less significant than what he did with it.
- [23] On June 11, 2014, Mr. Rothstein sent Mr. Soave text messages recommending that he purchase shares in Amaya. He testified that in the morning of June 12, 2014, he telephoned Mr. Soave and left a voicemail message informing him of the impending Acquisition. Although it is clear that Mr. Rothstein said something about the Acquisition – in June and July, 2014, he told Mr. Cheng and Mr. Killeen that he had done so, as both testified – he does not remember specifically what he said in his voicemail message. As a result, Staff bases much of their case on records of communications between Mr. Rothstein and Mr. Soave on June 11 and 12, 2014, on the timing and amount of Mr. Soave's purchase of Amaya shares and on his sale the following day at a significant profit, none of which is contested.
- [24] Staff prepared a chronology of events on June 11, 12 and 13, 2014 that included telephone calls, emails and text messages between Mr. Rothstein, Mr. Soave and other persons at CIBC's Thornhill branch and elsewhere with whom they communicated.<sup>7</sup> The communications between Mr. Rothstein and Mr. Soave, which form the central elements of Staff's case, and Mr. Soave's trades in Amaya follow:

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<sup>6</sup> Exhibit 234, Settlement Agreement with Mr. Rothstein; (2017) 40 OSCB 3718.

<sup>7</sup> Exhibit 57, Staff Chronology of Events. This chronology with the Panel's addition of other significant events on June 11, 12 and 13 accompanies these reasons as an appendix.

**June 11, 2014**

- at 11:54 a.m., Mr. Rothstein called Mr. Soave's cell phone, but there is no record of the call having been received;
- at 11:55 a.m., Mr. Rothstein sent Mr. Soave a text saying "Call me if you get a chance. Thx";
- at 2:56 p.m., Mr. Rothstein telephoned Mr. Soave's cell phone, but there is no record of the call having been received;
- at 4:05 p.m., Mr. Rothstein sent Mr. Soave a text saying "AYA", which was Amaya's trading symbol;
- at 7:58 p.m., Mr. Soave texted Mr. Rothstein, saying "Sorry never owned it should I";
- at 8:13 p.m., Mr. Rothstein sent a reply text saying "Yes";

**June 12, 2014**

- at 9:45 a.m., Mr. Rothstein telephoned Mr. Soave's cell phone and left a voicemail message; the call lasted 1 minute and 19 seconds;
- at 10:10 a.m., Mr. Soave telephoned his cell phone from his office phone; the call lasted 1 minute and 4 seconds;
- at 10:15 a.m., Mr. Soave sent an email to Mr. Rothstein saying "Thanks";
- at 10:18 a.m., Mr. Rothstein sent a reply email to Mr. Soave saying "Blackrock, blackstone and another huge one behind it";
- at 10:35 a.m., Mr. Soave purchased 5,000 shares of Amaya for \$60,755 (at \$12.10 per share);
- at 12:22 p.m., IIROC halted trading in Amaya shares;
- at 1:23 p.m., Mr. Soave sent a text to Mr. Rothstein saying "Wholy [sic] Shit";

**July 13, 2014**

- before the markets opened, Mr. Soave reallocated the Amaya shares to three trading accounts in his wife's and his name;
- at 9:32 a.m., Mr. Soave sold the 1,780 Amaya shares in one of these trading accounts for \$20 per share;
- at 9:33 a.m., Mr. Soave sold the 2,370 Amaya shares in a second trading account for an average price of \$19.73 per share;
- at 9:38 a.m., Mr. Soave sent Mr. Rothstein a text saying "Thank You";
- at 10:31 a.m., Mr. Rothstein phoned Mr. Soave's cell phone, but there is no record of the call having been received;
- at 10:54 a.m., Mr. Rothstein sent a text to Mr. Soave saying "Unbelievable";
- at 12:16 p.m., Mr. Soave sold the 850 Amaya shares in the third trading account for \$19.77 per share;
- at 12:18 p.m., Mr. Soave sent Mr. Rothstein a text saying "What fund won on the Trade";
- at 12:21 p.m., Mr. Rothstein sent an email to the gaming industry analyst at AHAM asking "Which funds got an allotment to Amaya?"

[25] These facts are not contested. The inferences to be drawn from the messages between Mr. Rothstein and Mr. Soave are key questions in this proceeding.

### III. ISSUES

- [26] Section 76 of the Act prohibits a person in a special relationship with an issuer from purchasing or selling securities of the issuer with knowledge of a material fact with respect to the issuer that has not been generally disclosed.
- [27] The questions in this proceeding are whether Mr. Soave was in a special relationship with Amaya and contravened section 76 when he purchased shares in Amaya on June 12, 2014. The definition of a “person in a special relationship with an issuer” includes a person who learns of a material fact with respect to the issuer from any other person in a special relationship with it and who “knows or ought reasonably to have known that the other person” was in a special relationship.
- [28] As AHAM had entered into a non-disclosure agreement on April 29, 2014, it was engaging in a business activity or was considering or evaluating whether or proposing to engage in a business activity with Amaya and was therefore in a special relationship with Amaya.<sup>8</sup> As officers and employees of AHAM, Mr. Cheng and Mr. Rothstein were also in a special relationship with Amaya.<sup>9</sup>
- [29] The issues to be resolved are thus whether Mr. Soave received from Mr. Rothstein a material fact, whether the material fact had been generally disclosed by 10:35 a.m. on June 12, 2014, when he purchased shares in Amaya, and whether he knew or should have known that Mr. Rothstein was in a special relationship with Amaya. The first two issues are components of the alleged prohibited conduct, that Mr. Soave purchased shares in Amaya with knowledge of a material fact that was not generally disclosed; the third issue, his knowledge of Mr. Rothstein’s special relationship, determines whether he was subject to the prohibition in subsection 76(1).<sup>10</sup>
- [30] Staff has the onus of proving each of these matters on a balance of probabilities.<sup>11</sup> If it is necessary to draw inferences, both the facts on which the inferences are based and the facts inferred must satisfy this same standard of proof; it must be more likely than not that they occurred.<sup>12</sup>

### IV. EVIDENCE AND FINDINGS

#### A. Knowledge of a Material Fact

- [31] A material fact is “a fact that would reasonably be expected to have a significant effect on the market price or value” of the securities to which it relates.<sup>13</sup> Materiality is thus an objective standard, based on the likely market impact of an event and its effect on investor expectations and investment decisions, influenced by the probability of the event occurring and its magnitude with respect to the securities’ value if it occurs.<sup>14</sup> Such facts are commonly understood to include facts relating to a possible merger, takeover bid, other corporate acquisition and other significant changes in a business’s operations.<sup>15</sup>
- [32] The parties do not contest that Amaya’s proposed acquisition of PokerStars was a material fact; in light of its impact on Amaya’s position in the internet gaming industry and on its income, there is no doubt that it was. The question is whether Mr. Soave was informed of it in the messages from Mr. Rothstein before his purchase of shares at 10:35 a.m. on June 12, 2014.

<sup>8</sup> Act, s 76(5) “person in a special relationship with an issuer” (b).

<sup>9</sup> Act, s 76(5) “person in a special relationship with an issuer” (c)(iv).

<sup>10</sup> Mr. Soave’s knowledge of a material fact is addressed in section IV.A of these Reasons; general disclosure is addressed in section IV.B; and Mr. Soave’s knowledge of Mr. Rothstein’s status is addressed in section IV.C.

<sup>11</sup> *F.H. v McDougall*, 2008 SCC 53 at para 40; *Azeff (Re)*, 2015 ONSEC 11, (2015) 38 OSCB 2983 at paras 41-42, affirmed 2018 ONCA 61 (CanLII), leave to appeal denied 2017 CanLII 84246 (SCC) (*Azeff*). This standard is often described as requiring clear, cogent and convincing evidence. This does not indicate a standard of proof other than a balance of probabilities. The Commission previously applied a standard that required clear, cogent and convincing evidence in proceedings for serious offences like insider trading and proceedings affecting a person’s livelihood, which standard was treated as more onerous than a balance of probabilities and less than the criminal beyond-a-reasonable-doubt; see e.g. *Donnini (Re)*, (2002) 25 OSCB 6225 at paras 100-101 and 229, affirmed 76 OR (3d) 43, 2005 CanLII 1622 (CA); *ATI Technologies Inc (Re)*, 2005 ONSEC 14, (2005) 28 OSCB 8558 at paras 13-15 (*ATI Technologies*); *A/T* at para 196. The Supreme Court’s 2008 decision determined that there is only one civil standard of proof; clear, cogent and convincing evidence means only sufficient evidence to prove a fact on a balance of probabilities; *McDougall* at paras 45-46.

<sup>12</sup> *R v Munoz*, (2006) 86 OR (3d) 134; *Walton v Alberta (Securities Commission)*, 2014 ABCA 273, leave to appeal denied, 2015 CanLII 14759 (SCC); *Azeff* at paras 43-49.

<sup>13</sup> Act, s 1(1) “material fact”.

<sup>14</sup> The Commission’s decisions on this standard are summarized in *Canaco Resources Inc (Re)*, 2013 BCSECCOM 310 at para 84; see also *SEC v Texas Gulf Sulphur Co*, (1968) 401 F2d 978 (2d Cir) at 985, cert denied (1969) 394 US 976.

<sup>15</sup> See e.g. *National Policy 51-201 – Disclosure Standards (NP 51-201)*, para 4.2.



**1. Evidence**

[33] Whether Mr. Soave was informed of a material fact must be determined in the context of the facts identified in Staff's chronology.<sup>16</sup> To summarize, in the afternoon and evening of June 11, 2014, Mr. Rothstein sent Mr. Soave text messages identifying Amaya and recommending that he purchase its shares. The following morning at 9:45 a.m., Mr. Rothstein called Mr. Soave's cell phone and left a voicemail message; the call lasted 1 minute and 19 seconds. Mr. Soave called his cell phone from his office at 10:10 a.m.; this call lasted 1 minute and 4 seconds.<sup>17</sup> Four minutes later, at 10:15 a.m., Mr. Soave sent Mr. Rothstein an email saying "Thanks". Three minutes after this, at 10:18 a.m., Mr. Rothstein sent a reply email saying "Blackrock, blackstone and another huge one behind it". Seventeen minutes later, at 10:35 a.m., Mr. Soave purchased 5,000 Amaya shares, which he sold the following day.

[34] The content of Mr. Rothstein's voicemail message is central to whether Mr. Soave had knowledge of a material fact.

**(a) Mr. Cheng's Testimony**

[35] Mr. Cheng testified that he told Mr. Rothstein of AHAM's participation in financing the Acquisition and that he could tell Mr. Soave and other individuals at CIBC's Thornhill branch who had invested in Argent to purchase shares of Amaya. He said Mr. Rothstein subsequently asked him about the financial backers of the Acquisition and he identified Blackstone and BlackRock. After the announcement, Mr. Rothstein told him he had informed Mr. Soave of the deal. Mr. Cheng so informed Mr. Tremblay and Mr. Killeen in late June and July. Mr. Cheng's evidence, however, does not indicate what Mr. Rothstein said in his voicemail message to Mr. Soave.

**(b) Mr. Killeen's Testimony**

[36] In late June, Mr. Killeen informed Mr. Cheng and Mr. Tremblay that he was conducting a compliance review of possible trading by employees of AHAM and another AHF affiliate in shares of Amaya before the announcement. He then learned from Mr. Tremblay that Mr. Cheng told Mr. Rothstein "to tell Frank Soave to buy the stock".<sup>18</sup> Mr. Cheng confirmed that following his request, Mr. Rothstein "passed on the tip" to Mr. Soave "who then traded and made large profits."<sup>19</sup> After learning this, Mr. Killeen questioned Mr. Rothstein, who said that he had traded personally "shortly after Ben [Cheng] asked him to tell Frank Soave to buy the stock."<sup>20</sup> Mr. Killeen testified that he wrote his two memoranda shortly after receiving this information. His evidence, however, does not address what Mr. Rothstein actually said, beyond indicating that he "passed on the tip" and told Mr. Soave to buy Amaya shares.

**(c) Mr. Rothstein's Testimony**

[37] As neither Mr. Cheng nor Mr. Killeen was able to provide direct evidence of what Mr. Soave was told, Mr. Rothstein's evidence is the most relevant. This brings Mr. Rothstein's credibility into issue. Mr. Rothstein, as he admitted in his testimony, has a poor memory and lied to Staff in his first interview. In that interview, although he admitted that he might have given Mr. Soave a "heads up", he denied that Mr. Cheng told him of the Acquisition, denied tipping Mr. Soave and denied knowing that Mr. Soave purchased shares.<sup>21</sup>

[38] In his second interview, he admitted having lied about each of these matters and said that Mr. Cheng told him to tell Mr. Soave and others in CIBC's Thornhill branch to buy shares in Amaya. He said he spoke with Mr. Soave by telephone on June 12, 2014 and had no specific recollection of the conversation, but probably told Mr. Soave that Mr. Cheng said to call and inform him of Amaya's Acquisition and the urgency of his purchasing. He said Mr. Soave asked him who was involved in financing Amaya's Acquisition and that he obtained that information and subsequently sent the email identifying BlackRock and Blackstone to Mr. Soave. Basing his evidence on the information provided to him by Staff concerning the timing of his telephone call to Mr. Soave that afternoon, the content of his texts to Mr. Soave and a telephone call from Mr. Cheng inviting him to a meeting in AHAM's boardroom, he said Mr. Cheng gave him the information in the boardroom around noon on June 11. He had no recollection of speaking to anyone else at CIBC's Thornhill branch.<sup>22</sup>

[39] In his third interview, Staff informed Mr. Rothstein that they had new information showing that his telephone call to Mr. Soave resulted in a voicemail message and that he could not have spoken to him on his 9:45 a.m. call on June 12. Mr.

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<sup>16</sup> See para 24, above.

<sup>17</sup> The fifteen-second difference was likely the time required for Mr. Rothstein to listen to the voicemail greeting on Mr. Soave's cell phone before he left his message.

<sup>18</sup> Exhibit 201, Killeen Memorandum, July 2, 2014.

<sup>19</sup> Exhibit 202, Killeen Memorandum, July 12, 2014.

<sup>20</sup> *Ibid.*

<sup>21</sup> Exhibit 241, Compelled Interview of John David Rothstein, June 15, 2016.

<sup>22</sup> Exhibit 235, Continued Compelled Interview of J D Rothstein, January 24, 2017.

Rothstein then said that the information he gave Mr. Soave could have been in a voicemail. Mr. Rothstein was also informed that Staff had seen calendar entries relating to his visit to AHAM's boardroom on June 11, which showed that he was called to a meeting in the boardroom with a third party relating to an acquisition of AHAM; as a result, Mr. Rothstein said he was likely not informed of the Acquisition by Mr. Cheng in that meeting, but must have been informed of it that day, as he recalled purchasing shares of Amaya immediately after receiving the information. In addition, Staff informed Mr. Rothstein that they had recently obtained telephone records showing that he had three calls with the Thornhill branch manager on June 11, 2014; Mr. Rothstein said he had not recalled them, but he thought the discussion with the branch manager was limited to Argent.<sup>23</sup>

- [40] In his testimony in the hearing, Mr. Rothstein said he lied in his first interview because he was trying to protect Mr. Cheng, who was his supervisor at AHAM, and Mr. Soave. He testified that Mr. Cheng informed him of the Acquisition and AHAM's participation in it and told him to pass the information on to Mr. Soave and other investment advisers at CIBC's Thornhill branch who had invested in Argent. He testified that in his voicemail message on June 12, he informed Mr. Soave of the fact that Amaya had a deal and of the immediacy to make sure Mr. Soave would buy shares and told him that AHAM funds were participating in the transaction.
- [41] On cross-examination, he admitted that his evidence in his interviews about being informed of the Acquisition in AHAM's boardroom on June 11 was an assumption. He also admitted that his statement about having spoken with Mr. Soave was incorrect; he said he had remembered that there was a telephone call, but not that he had left a voicemail message. He said again that he could not be sure what he said; his best recollection was that he said there was a deal, conveyed the immediacy of the situation and said that Mr. Soave should buy Amaya shares. He admitted his testimony that he informed Mr. Soave of AHAM's participation in the transaction was only an assumption. He also admitted that because he had left a voicemail message, Mr. Soave could not have talked to him. He could not explain his subsequent email concerning BlackRock and Blackstone.

**(d) Mr. Soave's Testimony**

- [42] Mr. Soave testified that after he received Mr. Rothstein's recommendation to purchase shares of Amaya on the evening of June 11, he conducted research into Amaya on his computer, looking at two websites, and was aware of the published rumours of Amaya's Acquisition of PokerStars. He said that the following morning, June 12, 2014, he reviewed newswire information, spoke to another adviser in his office who was familiar with Amaya and who himself owned Amaya shares and that his decision to purchase shares was based on Mr. Rothstein's June 11 recommendation, his own research, his discussion with the other adviser and the increase in Amaya's share price. He did not see the Bloomberg Article; he received the email from SeekingAlpha because he held shares in Blackstone, but said he did not connect it to Amaya.<sup>24</sup> He had no recollection of the voicemail message or of having listened to it and said his email thanking Mr. Rothstein at 10:15 a.m., four minutes after his call to his cell phone, related to the recommendation on June 11. He also said he did not connect Mr. Rothstein's 10:18 a.m. email about BlackRock and Blackstone to Amaya.

**2. Findings**

- [43] Mr. Hausman, counsel for Mr. Soave, submitted that in view of Mr. Rothstein having lied on his first interview, his poor memory and his assumptions, Mr. Rothstein's evidence concerning what he told Mr. Soave in his voicemail message should not be relied on in any manner.
- [44] There is no doubt that Mr. Rothstein's memory was poor. For example, he did not recall having spoken to the Thornhill branch manager on June 11 and even when shown the three calls with the branch manager, his recollection of their content was based on assumption, as he admitted in cross-examination. He had no recollection of the specifics of any of his conversations and was often mistaken about events. Much of his evidence in his second and third interviews and in the hearing reflected assumptions based on the undisputed facts concerning his telephone, email and other messages and the responses to them. These included his initial evidence about where Mr. Cheng informed him of the Acquisition, his statement that he spoke to Mr. Soave on June 12 and that Mr. Soave asked him about Amaya's financial supporters, again as he admitted in cross-examination.
- [45] After his first interview, Mr. Rothstein acknowledged these failings. Overall, he attempted to be honest in the hearing and his evidence, including his admissions on cross-examination, was credible with respect to his recollection that he informed Mr. Soave of the Acquisition and its imminent announcement and encouraged him to buy shares immediately. His testimony to this effect was consistent, including his statements in his three interviews. In his first interview, although denying almost everything about his conduct, he said he may have given Mr. Soave a "heads up". Following

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<sup>23</sup> Exhibit 236, Continuing Compelled Interview of John David Rothstein, October 23, 2017.

<sup>24</sup> See para 11, above.

this interview, he consistently testified to a telephone call and to telling Mr. Soave that there was a deal, of its immediacy and that he should trade. This evidence was not shaken on cross-examination.

- [46] It was also consistent with the telephone calls and messages between Mr. Rothstein and Mr. Soave and with Mr. Soave's conduct. On June 11, Mr. Rothstein recommended that Mr. Soave purchase shares in Amaya. In view of the reason for the tip and the length of the voicemail message which followed this recommendation on June 12, it is reasonable to infer that more was said in explanation. Mr. Rothstein's recollection that he informed Mr. Soave of the impending transaction and the imminence of the announcement so that he would buy shares is credible. Despite his failure to remember doing so, it is much more likely than not that Mr. Soave listened to this message at 10:10 a.m. His 10:15 a.m. email thanking Mr. Rothstein is best understood as a response to Mr. Rothstein's voicemail message.
- [47] Mr. Rothstein replied three minutes later saying in his email, "Blackrock, blackstone and another huge one behind it". Staff argued that this email itself disclosed a material fact by identifying BlackRock because BlackRock's identity was not disclosed by Amaya until its management information circular was published on June 30, 2014. Although identification of a participant in a financing may provide additional certainty about the probability of a transaction and therefore be a material fact,<sup>25</sup> it need not be determined whether it was in this instance. In the context of the email from SeekingAlpha received by Mr. Soave at 10:15 a.m., which reported Blackstone's US\$1 billion financing for an existing client, Mr. Rothstein's 10:18 a.m. email clearly linked BlackRock and Blackstone to the Acquisition; it said they and "another huge one" were "behind it". This email thus confirmed the material fact, namely, the Acquisition, disclosed in his voicemail message.
- [48] Even though Mr. Soave had received the 10:15 a.m. SeekingAlpha email, he testified that he did not connect Mr. Rothstein's 10:18 a.m. email with the Amaya transaction. He said he found it "a bit weird". This is not surprising in view of the fact that he had no recollection of the voicemail message. Whether or not he associated the email with Mr. Rothstein's preceding voicemail message, the only reasonable inference, on a balance of probabilities, is that Mr. Soave's purchase seventeen minutes later was motivated by the information he received from Mr. Rothstein. In all of the circumstances, there can be little doubt that Mr. Soave was informed of the impending announcement of Amaya's Acquisition of PokerStars.

## **B. General Disclosure**

- [49] A person with privileged access to material facts about an issuer who trades with an informational advantage does not incur the same risks as investors who do not have equal access to the information. With equal access, that is, once information is equally available to public investors, the information will generally be reflected in the market price of securities. The Act therefore prohibits insider trading only when the material facts known to an insider have not been generally disclosed.<sup>26</sup>
- [50] General disclosure, however, is not defined in the Act or the regulations and rules under it. Reflecting the policy in the Act, regulators have consistently held that a material fact has not been generally disclosed until it has been disseminated in a manner that ensures it reaches the marketplace and public investors have had reasonable time to consider its implications.<sup>27</sup> This has long been the Commission's position,<sup>28</sup> and is reflected in NP 51-201.<sup>29</sup> While disclosure originates with and is usually made by issuers, it is possible that material information may be generally disclosed by others.<sup>30</sup>

### **1. Evidence**

- [51] There were rumours of an acquisition by Amaya in May, 2014, which appear to have resulted in increased trading volume and prices for Amaya's shares. On May 23, 2014, for example, a blogger called "goldencalf" wrote a three-line post headed "fact or fiction" on Stockhouse, an internet site with market information about securities; it asked whether anyone had heard the rumour that Amaya might be buying PokerStars.net, stating "someone I know high up at a major brokerage firm mentioned this to me the other day."<sup>31</sup> This was followed by a second post by "solarman2013" the same day which suggested that the trading in Amaya's shares supported the rumour, concluding "I suspect they have the biggest acquisition yet lined up and that the current level of \$10+ will be far surpassed when they announce."<sup>32</sup>

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<sup>25</sup> See e.g. *SEC v Mayhew*, (1997) 121 F3d 44 at 51 (2d Cir) (**Mayhew**).

<sup>26</sup> Act, s 76(1).

<sup>27</sup> See e.g. *Faberge, Inc*, Securities Exchange Act Release No 10174, May 25, 1973, [1973] CCH Fed Sec L Rep, ¶ 79,378 (SEC).

<sup>28</sup> See *Connor (Re)*, [1976] OSCB 149 at 174-177 (suggesting a minimum one-day waiting period) (**Connor**).

<sup>29</sup> NP 51-201, para 3.5.

<sup>30</sup> See e.g. *Lum (Re)*, 2015 BCSECCOM 189 at paras 70-73.

<sup>31</sup> Exhibit 190, Stockhouse post, May 23, 2014 (goldencalf).

<sup>32</sup> Exhibit 191, Stockhouse post, May 23, 2014 (solarman2013).

- [52] On May 24, 2014, a website called “CalvinAyre.com” (**CalvinAyre**) published an article referring to unidentified sources that said “that an agreement is in place that would see Amaya assume ownership of the Isle of Man-based online poker colossus” that owned PokerStars. This article stated, however, that on its face, the “mechanics of the deal don’t seem feasible ... [PokerStars] asking price would presumably be seriously out of Amaya’s budget.” It concluded with a question as to whether this was smoke or fire or a towering inferno.<sup>33</sup> Another internet article the same day was entitled “Amaya Gaming Soaring share price triggers takeover speculation”, but it did not contain additional information.<sup>34</sup>
- [53] A subsequent post on May 26, 2014, again by goldencalf, reasserted the rumours and concluded that the only possible buyer of PokerStars was a gambling enterprise other than Amaya. In response to these rumours, Amaya published its May 26 press release stating that it did not comment on acquisitions unless and until there was a binding legal agreement.<sup>35</sup> And on May 29, 2014, poker-online.com, an internet website, published an article entitled “Rumored Amaya-PokerStars Merger Might Not Happen.”<sup>36</sup>
- [54] There were no further significant reports until June 12, 2014, when at 9:07 a.m., the Bloomberg Article was published online stating that at an investor conference in New York, the head of Blackstone’s credit business said Blackstone was preparing to announce its largest ever credit deal with a commitment of over US\$1 billion for an acquisition financing deal with a North American company that was an existing client of GSO to which it had lent funds two years previously and that the acquisition would make the company a global player in its industry.<sup>37</sup> This information was circulated later that morning by SeekingAlpha in the email received by Mr. Soave at 10:15 a.m.<sup>38</sup> Although neither of these reports identified Amaya or PokerStars, Amaya was GSO’s existing client.
- [55] An article published in the Financial Post at 1:54 p.m., after the trading halt, said PokerStars was “near a deal to be acquired by” Amaya and that a knowledgeable person who asked not to be named “because the talks aren’t public” said it might be announced that day. The article referred to GSO as among Amaya’s backers, to the US\$1 billion financing amount and to the purchase of PokerStars’ parent corporation. It also said a spokesman for Amaya declined to comment, “citing company policy not to comment on rumours or speculation” and that spokespersons for PokerStars and Blackstone also declined to comment.<sup>39</sup>

## 2. Expert Evidence

- [56] Dr. Jennifer Marietta-Westberg, a senior economist at Cornerstone Research and a member of the Investor Advisory Committee of the US Securities and Exchange Commission (**SEC**), was called as an expert witness on behalf of Mr. Soave. Prior to joining Cornerstone Research, Dr. Marietta-Westberg obtained a Ph.D. in finance, was an assistant professor at Michigan State University, and worked for ten years at the SEC, ultimately as deputy chief economist/deputy director from 2013 to 2016. Dr. Marietta-Westberg’s testimony was advanced to provide context to assist the Commission in determining what information was available in the market and not to provide an opinion on general disclosure. A majority of the Panel qualified Dr. Marietta-Westberg to provide expert evidence, primarily to ensure that Mr. Soave had a full opportunity to present his defence.<sup>40</sup>
- [57] Dr. Marietta-Westberg’s report and testimony were based on her review of information relating to Amaya contained in analyst and news reports, including websites and blogs, that were published between March, 2013 and June 12, 2014, and her analysis of trading volumes and prices of Amaya’s shares during this period. Characterizing the publications as “public speculation of the likelihood, timing, financing and target of an upcoming Amaya acquisition”, she concluded that prior to Amaya’s announcement on June 12, 2014, “a reasonably informed market participant would have been able to obtain from multiple public sources, including analyst reports and message boards, relevant information related to the likelihood, timing, financial and ultimate target of Amaya’s acquisition of ... [PokerStars and that this] information would have been available to traders and other market participants trading in Amaya’s common stock prior to the official announcement date.”<sup>41</sup> She also concluded that the daily market movements in Amaya’s common stock were “consistent with market participants trading on the early public news dissemination regarding Amaya’s potential upcoming acquisition.”<sup>42</sup>

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<sup>33</sup> Exhibit 182, CalvinAyre article, May 24, 2014.

<sup>34</sup> Exhibit 183, Recentpoker.com article, May 24, 2014.

<sup>35</sup> Exhibit 54, Amaya Press Release, May 26, 2014 at 388; see para 9, above.

<sup>36</sup> Exhibit 187, poker-online.com article, May 29, 2014.

<sup>37</sup> Exhibit 193, Email from AHAM gaming analyst to AHAM portfolio manager.

<sup>38</sup> Exhibit 62, Soave documents at 55.

<sup>39</sup> Exhibit 224, “Amaya Gaming said to be near takeover deal of PokerStars gambling site”, June 12, 2014.

<sup>40</sup> Commissioner Anisman would not have qualified Dr. Marietta-Westberg. In his view, her evidence was not necessary to assist the Panel in determining whether Amaya’s intended Acquisition of PokerStars was generally disclosed or with respect to Mr. Soave’s knowledge; see *White Burgess Langille Inman v Abbott and Haliburton Co*, 2015 SCC 23 at paras 19-23; *R v Mohan*, [1994] 2 SCR 9 at paras 21-22.

<sup>41</sup> Exhibit 308, Expert Report of Jennifer Marietta-Westberg, Ph.d., paras 8(a) and 15.

<sup>42</sup> *Ibid*, paras 8(h) and 19.

- [58] Having heard this evidence, the Panel concluded that it was of little assistance in determining whether Amaya's imminent announcement of the Acquisition was generally disclosed when Mr. Soave purchased its shares; nor did it assist in determining whether Mr. Soave was aware that he was receiving inside information from Mr. Rothstein.

### 3. Findings

- [59] Mr. Hausman submitted that the publications preceding Amaya's announcement contained sufficient information to disclose generally Amaya's Acquisition of PokerStars and its imminent announcement. He argued that this was supported by the increase in Amaya's trading volume and price in May and June and, particularly, by the increases on June 12, following publication of the Bloomberg Article and the SeekingAlpha email. He argued that the Financial Post article in the afternoon of June 12 indicated that the information about Amaya's Acquisition had been generally disclosed prior to IIROC's trading halt. In his submission, the one-day waiting period suggested by the Commission in its 1976 Connor decision is neither appropriate nor necessary in the internet age.
- [60] The Panel does not agree that the Acquisition was generally disclosed when Mr. Soave made his purchase. Rumours are not themselves facts; they lack the certainty required to be factual rather than speculative.<sup>43</sup> While the reports in May drew attention to the possibility of an acquisition by Amaya, none of them contained any specific information and none suggested that the Acquisition would actually occur or even that it was likely. They did not constitute general disclosure of a transaction that Amaya itself refused to acknowledge on May 26, 2014, when it issued a press release saying it did not as a matter of policy confirm rumours and that if there were a transaction to announce, it would be announced only when an agreement was signed.
- [61] Mr. Hausman characterized Amaya's May 26 press release as a "non-denial denial". Although the existence of negotiations relating to the Acquisition may have been a material fact, Amaya was not required to disclose them until they constituted a material change in its business, operations or capital, and a denial of ongoing negotiations would have been a misrepresentation.<sup>44</sup> Amaya's press release reflected its policy concerning its timely disclosure obligations for acquisitions. The prohibition against insider trading applies in such circumstances so that persons who are aware of the negotiations may not trade before the fact that negotiations are being conducted has been generally disclosed. In the context of the Act's provisions, the characterization of Amaya's press release as a "non-denial denial" highlights the fact that the Acquisition was not then generally disclosed.
- [62] The Bloomberg Article and SeekingAlpha email on June 12 also did not generally disclose the Acquisition. While a sophisticated investor might have been able to draw inferences from them, they did not provide sufficient certainty or specificity to generally disclose the imminent announcement of the Acquisition to the public marketplace, let alone to give public investors adequate time to assess it with a view to making their own investment determinations.<sup>45</sup> This is evident from the fact that Mr. Soave himself did not relate Mr. Rothstein's 10:18 a.m. email identifying BlackRock and Blackstone to Amaya's Acquisition, even though he had received the SeekingAlpha email three minutes earlier. It is reinforced by the characterization of these reports by Amaya's spokesman in the subsequent Financial Post article as rumours and speculation. In any event, as the Financial Post article followed IIROC's trading halt, it does not reflect general disclosure of the Acquisition prior to Mr. Soave's purchase of Amaya shares over three hours earlier.
- [63] As a result, it is not necessary to address the appropriate waiting period in light of the development of the internet. Nevertheless, it should be noted that the minimum one-day waiting period suggested in the Connor decision to ensure public investors have an opportunity to analyze material information published by an issuer before its insiders can trade was a guideline, not a mandatory requirement applicable in all cases. As the Commission said in *Connor*:

[t]here can be no firm rule as to what time interval this will normally be. It very much depends upon the nature and complexity of the information, the nature of the market for the stock, the place of the market for the stock, the place of the company's operations and the place of the dissemination of the news release. We do feel confident in saying, however, that an insider may not trade with the release of the news ...<sup>46</sup>

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<sup>43</sup> See e.g. *Compact Edition of the Oxford English Dictionary* (OUP 1971) at 2601 ("statement or report circulating in a community, of the truth of which there is no clear evidence"); *Oxford Living Dictionaries English*, <https://en.oxforddictionaries.com/definition/rumour> ("currently circulating story or report of uncertain or doubtful truth"); *Oxford Living Dictionaries, English: Thesaurus*, <https://en.oxforddictionaries.com/thesaurus/rumour> (synonym: speculation; antonym: hard facts).

<sup>44</sup> Act, s 1(1) "material fact" and ss 75 (timely disclosure "where a material change occurs") and 126.2 (misleading statements); and see *Ati* at paras 209-223.

<sup>45</sup> See *Waheed (Re)*, 2014 ONSC 23, (2014) 37 OSCB 8007 at para 396; see also *Mayhew* at 50-51.

<sup>46</sup> *Connor* at 174. It is also worth noting that *Connor* was decided when the Act contained only a civil remedy for persons harmed when an insider made use of undisclosed specific confidential information for his or her own benefit or advantage and did not prohibit insider trading; *Securities Act*, RSO 1970, c 426, s 113. "Insider" was then defined as a director, senior officer or ten-per-cent shareholder of a public corporation; ss 109(1)(b) and (c). See also NP 51-201 at para 3.5 n 21 (time parameters in *Connor* may not be "appropriate for modern technology").

In other words, each case must turn on its own facts. While the principle concerning the timing of trading by insiders is well-established, the implications of electronic communications for the length of the one-day minimum waiting period must await a proceeding in which a determination is required on the facts presented.

- [64] On the facts in this proceeding, the Panel find that Mr. Soave purchased the Amaya shares with knowledge of a material fact that had not been generally disclosed at the time of his purchase. This finding, however, does not resolve this matter. Whether Mr. Soave was in a special relationship with Amaya when he made the purchase must now be addressed.

### C. Special Relationship

- [65] The prohibition against insider trading is intended to prevent insiders from taking advantage of material information that is not available to other market participants and thus engaging in potentially riskless trading to obtain an unfair advantage from their privileged access to the information. Because of the difficulties of demonstrating use of such information or intention, the prohibition is premised on the insiders' "special relationship" with the issuer and knowledge of a material fact.<sup>47</sup> A person not in a direct fiduciary, professional or business relationship with an issuer who receives material information is defined by the Act as being in a special relationship only if the recipient "knows or ought reasonably to have known" that the person providing the information is a person in a special relationship.

- [66] Mr. Soave would thus have been in a special relationship with Amaya only if he knew or reasonably should have known that Mr. Rothstein was in such a relationship when he delivered the voicemail and other messages. Mr. Soave would have known this if Mr. Rothstein had informed him that AHAM signed the non-disclosure agreement or was participating in the financing of Amaya's Acquisition or had provided other information that clearly indicated its derivation from a privileged source,<sup>48</sup> however that information was conveyed.

#### 1. Mr. Soave's Knowledge

##### (a) Evidence

- [67] Although Mr. Rothstein testified that he told Mr. Soave that AHAM funds were participating in the financing of Amaya's Acquisition, he did not recall the specific content of his voicemail message and he said in cross-examination that his testimony concerning this information was not a recollection but was an assumption. Mr. Soave was aware that insider trading was prohibited under the Act and in CIBC's policy manual. He testified that he had no recollection of receiving or listening to the voicemail message. While he knew that a mutual fund could participate in a private placement, he testified that he did not know when this occurred and that he was not aware that AHAM was participating in the financing of Amaya's Acquisition until he was examined by Staff in the course of their investigation. He knew that AHAM funds held shares in Amaya and said he believed Mr. Rothstein's recommendation and messages came from a portfolio manager or analyst at AHAM. There is thus no direct evidence that Mr. Soave was told that AHAM was participating in Amaya's Acquisition or that he knew that Mr. Rothstein was in a special relationship with Amaya.
- [68] Much of the evidence related to Mr. Rothstein's activities as a wholesaler and his efforts to encourage Mr. Soave and other investment advisers to invest in AHAM's mutual funds. Mr. Rothstein arranged meetings with portfolio managers who provided information about their top holdings to investment advisers. Mr. Soave said that wholesalers passed on such recommendations to him all the time, that Mr. Rothstein and other wholesalers provided access to recommendations from their portfolio managers and often summarized the recommendations of their portfolio managers outside of meetings, primarily by email. Mr. Cheng identified such an email about an issuer other than Amaya that was sent to colleagues of Mr. Soave by Mr. Rothstein on May 13, 2014 as typical.<sup>49</sup>
- [69] Mr. Soave often invested in securities based on such recommendations, sometimes placing his order during a portfolio manager's presentation in a meeting. Jordan Zale, a former colleague at CIBC's Thornhill branch, testified that Mr. Soave had a large risk appetite. Mr. Soave said he accepted greater personal risks than he would for his clients and adduced evidence concerning his personal investments. He produced and reviewed a number of statements from 2014 and 2015 for his and his family's accounts, which he administered, and identified twenty-two purchases between approximately \$28,000 and \$300,000, twenty of which were based on recommendations from portfolio managers. Of

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<sup>47</sup> The Act's original prohibition against improper insider trading contained a defence if a person proved "that he did not make use of [his] knowledge of the material fact" in selling or purchasing a security; *Securities Act*, 1978, SO 1978, c 47, s 75. The "make use of" standard enabled a person who traded with knowledge of an undisclosed material fact to avoid liability on the basis that the knowledge did not influence his or her decision to purchase or sell and was therefore not used; see e.g. *Green v Charterhouse Group Canada Ltd*, (1976) 12 OR (2d) 280 (CA) at 306-308; *Connor* at 169-170. The Act was amended in 1987 to adopt the approach in section 76; see *Securities Act*, RSO 1980, c 466, s 75, as amended by SO 1987, c 7, s 7.1. Tippees were added to the definition of "special relationship" at this time.

<sup>48</sup> It is not necessary that the ultimate source be identified; see e.g. *Azeff* at paras 177, 180 and 202-205.

<sup>49</sup> Exhibit 254, Email from Mr. Rothstein to CIBC investment advisers, May 13, 2014.

these twenty, twelve purchases were greater than \$60,000 and six of these were \$100,000 and more. All purchases in these “pro accounts” had to be reviewed by a branch administrator and his branch manager.<sup>50</sup>

- [70] Although he had not previously held shares in Amaya, Mr. Soave had invested in two gaming companies, one of which had been acquired by Amaya. After Amaya’s announcement he sent emails to AHAM’s gaming analyst inquiring whether the Amaya transaction would be beneficial for the gaming company in which he still held securities; the book value of this investment was approximately \$92,000.<sup>51</sup> In March, 2015, he purchased shares of NYX Gaming Group Ltd. for over \$70,000 for his wife’s account after a luncheon meeting in which it was recommended by a non-AHAM portfolio manager.
- [71] Following his Amaya purchase and the trading halt, Mr. Soave sent a number of emails to Mr. Rothstein and to colleagues concerning Amaya. The first was to Mr. Rothstein at 1:23 p.m. on June 12, 2014, in which Mr. Soave simply said “Wholy [sic] Shit”. He explained this email as a response to the price increase in Amaya’s shares after his purchase and the fact that by the time of the trading halt he had made \$10,000. He subsequently sent emails to Mr. Zale and to his assistant about Amaya; after he informed Mr. Zale at 1:24 p.m. that it was up \$2, he asked his assistant how many shares he had purchased and when told 5,000, he responded “Shit I wish I had bought more”.<sup>52</sup>
- [72] The next morning, prior to the opening of the market, he reallocated his Amaya shares to three different accounts before selling the shares; the reallocation required approval by a CIBC Thornhill branch administrator who could refer it to his branch manager. Mr. Soave also sent texts or email messages to a colleague at CIBC informing her of his purchase, to others in the industry asking whether they held Amaya shares, to a client who held shares in Amaya asking about his holdings, and to his branch manager, whom he told he had held 5,000 Amaya shares.<sup>53</sup>
- [73] Mr. Soave also sent a text message to Mr. Rothstein at 12:18 p.m. on June 13 asking him “What fund won on the Trade”. Mr. Rothstein interpreted this question as relating to Amaya’s private placement and at 12:21 p.m. sent an email to AHAM’s gaming analyst asking which funds received an allotment. Mr. Rothstein testified that this was his understanding, but on cross-examination, he admitted that in his second interview by Staff, he had interpreted this question as meaning which AHAM fund held Amaya shares and that he could not be sure that his initial understanding was accurate. Mr. Soave testified that he was asking which fund benefitted from the price increase as a result of its holdings in Amaya.

**(b) Findings**

- [74] Mr. Hausman submitted that knowledge of Mr. Rothstein’s special relationship can only be demonstrated by direct evidence. This is not the case. Knowledge of a tipper’s relationship with an issuer, like knowledge of a material fact, is frequently a matter of inference.<sup>54</sup> It goes without saying that any such inference must reasonably flow from facts that are proved in evidence.<sup>55</sup>
- [75] Factors that are relevant to such an inference are the tippee’s position and knowledge, the tipper’s position and relationship with the tippee, the nature of the disclosed information, the timing of the receipt of the information and the tippee’s trades, whether the tippee conducts any research or makes inquiries of the tipper, the tippee’s prior ownership of the securities traded, the significance of the trade in light of the tippee’s prior trading, portfolio and assets, and any attempt by the tippee to conceal the trading. An inference of knowledge must take these factors into account, to the extent they are relevant, in the context of all of the evidence.
- [76] At the time of his purchase, Mr. Soave had been a registrant for twenty-eight years and had managed client accounts at CIBC’s Thornhill branch since 2001. He knew that mutual funds receive confidential information in connection with private placement transactions in which they participate and that Mr. Rothstein was employed by a fund manager. Mr. Rothstein had never previously recommended a specific security in the manner he recommended Amaya in his text messages on June 11, 2014, and Mr. Soave received material information in Mr. Rothstein’s voicemail and subsequent email the following morning, which led him to purchase the Amaya shares.<sup>56</sup> Although he looked at two websites to obtain information on Amaya the night before, looked at newswire information and spoke to another investment adviser in the morning on June 12, and was aware of the rumours of the Acquisition, he did not ask Mr. Rothstein how he knew there was a deal. Instead he made a \$60,000 purchase almost immediately after he received Mr. Rothstein’s email at

<sup>50</sup> A “pro account” is an account of a registrant or a member of the registrant’s family with the same residence as the registrant.

<sup>51</sup> Exhibit 294, Soave CIBC Account Statement, June 2014, Tab 2A.

<sup>52</sup> Exhibit 57, Staff Chronology of Events; see Appendix, below.

<sup>53</sup> Exhibit 239, Emails with Mr. Soave at 110-111 (branch manager); and see Appendix, below.

<sup>54</sup> See e.g. *Suman (Re)*, 2012 ONSEC 29, (2012) 35 OSCB 2809 at para 307 (*Suman*); *Azeff* at para 43; see also e.g. *SEC v Michel*, (2007) 521 F Supp 2d 795 at 823-825.

<sup>55</sup> *Suman* at paras 305-309; the use of circumstantial evidence is fully discussed in *Suman* at paras 288-304; see also para 30, above.

<sup>56</sup> See paras 45-48, above.

10:18 a.m., and he sold the shares the next day at a substantial profit. These facts, taken alone, could lead to an inference that he knew that Mr. Rothstein was in a special relationship with Amaya, as Staff submitted.

- [77] When viewed in light of all the evidence, however, this inference is less than compelling. Mr. Soave had dealt with Mr. Rothstein as a wholesaler for AHAM and other fund managers for over ten years and he had not received inside information from him during that time. He customarily received recommendations from Mr. Rothstein and other wholesalers that reflected the views of their portfolio managers. Although he had never before received a recommendation from Mr. Rothstein like the one on June 11, the manner in which it was sent was not sufficiently different from other recommendations to lead him to believe that Mr. Rothstein was in a special relationship with the issuer.
- [78] The information he received in Mr. Rothstein's voicemail and subsequent email was also not sufficient to alert him to Mr. Rothstein's special relationship. Mr. Rothstein told him in the voicemail that a deal was about to be announced in which he should invest quickly. While this was a material fact that influenced his purchase,<sup>57</sup> it was not information that could only have come from a confidential source in a special relationship with the issuer. In this respect, it is unlike detailed, very specific information such as the price and timing of a future takeover bid, which could only come from an insider source, as was the case in the Commission's *Azeff* decision.<sup>58</sup> It should be noted in this context that the Commission in *Azeff* suggested that on the facts of that case, a tip that the target was "in play" could have been based on a rumour.<sup>59</sup> In short, the information in Mr. Rothstein's voicemail message would not necessarily lead to an inference by Mr. Soave that it came from a person in a special relationship with Amaya.
- [79] Nor would Mr. Rothstein's subsequent email identifying BlackRock and Blackstone. Although the identification of BlackRock might provide a basis for an inference of knowledge, it was not sufficient in the context to inform Mr. Soave of a special relationship in view of his belief that the source of Mr. Rothstein's information was a portfolio manager conveying information about an issuer whose securities were held by AHAM and followed by its portfolio managers and its gaming analyst. This belief could also explain why he did not ask Mr. Rothstein where he obtained the information, especially as Mr. Rothstein's position as a sales manager and wholesaler would not ordinarily be expected to give him access to confidential information relating to a proposed private placement or non-disclosure agreement.
- [80] Although Mr. Soave purchased Amaya shares virtually immediately following his receipt of Mr. Rothstein's information, the purchase was consistent with his trading practice. The uncontroverted evidence was that he had an appetite for risk and often purchased securities quickly after receiving a recommendation from a portfolio manager, sometimes during the course of the manager's presentation. The size of his Amaya purchase was also not out of the ordinary; he frequently made such investments in amounts greater than \$60,000. The amount of this one was in the middle of those presented in evidence. There was also evidence of his selling securities quickly to obtain a relatively small profit. In light of this evidence, the fact that he had not purchased shares in Amaya previously is not a sufficient basis for an inference of knowledge, especially as he had previously made equally significant investments in issuers in the gaming industry and did so again the following year.
- [81] Staff argued that Mr. Soave's texted query, "What fund won on the Trade", demonstrated his awareness of AHAM's participation in Amaya's financing. Although Mr. Rothstein so understood it, as is clear from his email to AHAM's gaming analyst three minutes later, Mr. Soave testified that he was asking which mutual fund held Amaya shares and benefitted from the increase in their trading price. Both understandings are possible in view of the ambiguity of Mr. Soave's question. Mr. Rothstein's understanding, and Staff's reading, interprets "won" as meaning which fund received an allotment of subscription rights. On the other hand, Mr. Soave's evidence interprets "won on" to mean "benefitted from" and "trade" to mean Amaya's transaction. Both interpretations are equally difficult and equally plausible.
- [82] Finally, Mr. Soave's conduct on June 12 and 13 following his purchase is relevant to his knowledge when he traded. Conduct that attempts to conceal a trade, including after the trade occurred, suggests a consciousness of impropriety and may indicate knowledge that a tippee's informer was in a special relationship.<sup>60</sup> Although the converse will not always reflect a lack of knowledge, conduct following a trade that suggests a lack of awareness of impropriety may be taken into account when considering whether knowledge should be inferred.

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<sup>57</sup> See *ibid*; see also *Mayhew* at 51 (confirmation of rumours "transformed the likelihood of a ... merger from one that was ... possible to one that was highly probable quite soon").

<sup>58</sup> *Azeff* at paras 138, 146-148, 197 and 203(d).

<sup>59</sup> *Ibid* at para 203(d). This was a determination which reflected the facts before the Commission panel; a different conclusion might be reached in other circumstances.

<sup>60</sup> See e.g. *ATI Technologies* at para 71. On the use of post-offence circumstantial evidence to support an inference of intention or knowledge, see e.g. *R v S.B.1*, 2018 ONCA 807.



- [83] Mr. Soave's conduct following his purchase must be considered. His first response to Mr. Rothstein at 1:23 p.m., following the \$2 price increase and the trading halt, "Wholy [sic] Shit", suggests surprise and is inconsistent with his knowing he received inside information, which goes with knowledge of a special relationship. Had he known this, the price increase would likely have been expected. His comment to his assistant at 1:28 p.m. that he should have bought more is to the same effect. Mr. Soave's communications with colleagues and others on June 13 revealing that he owned Amaya shares also suggest no consciousness of impropriety. This is especially so with respect to his emails to his branch manager about his Amaya holding, as the purchase and his reallocation of Amaya shares earlier that day had to be reviewed and his email on June 13 would have drawn the branch manager's attention to Mr. Soave's purchase the day before.
- [84] Although an inference of knowledge is possible, taking into account all the evidence, it has not been shown on a balance of probabilities that Mr. Soave knew that Mr. Rothstein was in a special relationship with Amaya. There is no direct evidence to so link him, as the recommendation and other information received by Mr. Soave from Mr. Rothstein did not indicate that AHAM had signed a non-disclosure agreement or was participating in the financing of Amaya's Acquisition. Nor is an inference of knowledge compelled by the facts, as Mr. Rothstein's recommendation and other messages were consistent with his activities as a wholesaler. It was not unreasonable in the circumstances for Mr. Soave to have believed that these communications reflected recommendations from a portfolio manager as his post-purchase conduct suggests and as he testified.
- [85] The Panel find, therefore, that it has not been proved that Mr. Soave knew that Mr. Rothstein was in a special relationship with Amaya when he purchased Amaya shares.

## 2. Whether Mr. Soave should have known

- [86] The same factors apply to a determination of whether Mr. Soave ought reasonably to have known that Mr. Rothstein was in a special relationship.<sup>61</sup> Unlike actual knowledge, this is an objective standard based on what a reasonable person with Mr. Soave's knowledge and experience should have inferred in the circumstances.<sup>62</sup>
- [87] Under this standard Mr. Soave's status as a registrant and his experience in the industry should be given greater weight, as "a higher standard of alertness is expected of" a registrant than of a member of the general public.<sup>63</sup> Although section 76 does not expressly impose a positive obligation to conduct due diligence, this higher standard reflects the expectations that accompany registration, namely, that the training, experience and ethical conduct required of registrants will be taken into account.<sup>64</sup> For example, a registrant's failure to ask questions may be more significant when determining what the registrant ought to have understood from information of which he or she was aware when trading.
- [88] In light of his experience as a registrant and having received material information about Amaya's Acquisition and its immediacy in the voicemail message, the SeekingAlpha email and the subsequent email identifying BlackRock and Blackstone, which information triggered his purchase, it can be concluded that Mr. Soave should have known that Mr. Rothstein was in a special relationship. Even though he did not, it is arguable that a reasonable securities professional in his position, knowing what he knew, should have realized that it came from a privileged source and special relationship.
- [89] Mr. Soave's experience as a registrant, however, includes his relationships with wholesalers for fund managers and their practice. In the circumstances, it was not unreasonable for him to believe that the information came from a portfolio manager or analyst who was following Amaya for the reasons expressed above with respect to his actual knowledge.<sup>65</sup> A portfolio manager or gaming sector analyst following Amaya would be expected to know of rumours and other developments, including information in the SeekingAlpha email that Blackstone was financing the transaction.<sup>66</sup> The additional identification of BlackRock in Mr. Rothstein's 10:18 a.m. email would likely not have indicated to a person who was not following Amaya with the same intensity that its source must have been a person in a special relationship.

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<sup>61</sup> See para 75, above; *Azeff* at paras 43 and 64-65; see also *Re Investors Management Co, Inc*, Securities Exchange Act Release No 9267, July 29, 1971, [1970-1971] CCH Fed Sec C Rep, ¶ 78,163 at 80,520-80,521.

<sup>62</sup> *Azeff* at para 63.

<sup>63</sup> *Ibid* at para 64(c).

<sup>64</sup> See e.g. *Danuke (Re)*, (1981) 2 OSCB 31C (September 18) at 40C-41C.

<sup>65</sup> See paras 77-79, above.

<sup>66</sup> In fact, AHAM's gaming analyst was aware of this information, as he sent an email with a copy of the 9:07 a.m. Bloomberg Article to an AHAM portfolio manager at 9:11 a.m.; Exhibit 193, Email from AHAM gaming analyst to AHAM portfolio manager.

[90] As a result, whether Mr. Soave should have known of Mr. Rothstein's special relationship with Amaya is a close question, with the evidence permitting either inference. This does not satisfy the standard of proof. In the Panel's view, Staff have not proved on a balance of probabilities that Mr. Soave should have known of Mr. Rothstein's relationship.

[91] For these reasons, the Panel find that Mr. Soave was not in a special relationship with Amaya when he purchased its shares on June 12, 2014.

**D. Misrepresentations to Staff**

[92] Staff also alleged that Mr. Soave made misrepresentations in his compelled examination when he denied that Mr. Rothstein informed him of material facts on the basis of which he purchased shares in Amaya and when he provided false explanations of texts and emails.<sup>67</sup> In their oral submissions, Staff conceded that if Mr. Soave is not found to have contravened section 76 of the Act, these allegations cannot be maintained.

[93] For all of these reasons, the proceeding against Mr. Soave is dismissed.

**V. STAFF CONDUCT**

[94] In his submissions, Mr. Hausman alleged that Staff unfairly published Mr. Rothstein's settlement agreement and the initial Statement of Allegations in this proceeding, both dated April 12, 2017, because they incorrectly said that Mr. Rothstein had spoken with Mr. Soave when he had not and that Staff had not disclosed this fact to the Commission panel that approved Mr. Rothstein's settlement. He argued that publication of the incorrect statements damaged Mr. Soave's reputation and should not have occurred. Although he did not request any form of relief, he submitted that the Panel should address this alleged unfairness. Although this submission does not affect the merits of this proceeding, it involves a serious allegation and should be addressed.

[95] Staff have an obligation to act honestly and fairly in all their enforcement activities, and the Commission relies on Staff to do so.<sup>68</sup> If Staff fail to conduct themselves in accordance with these standards, any unfairness can be addressed on an application or a motion by a person who is affected, assuming that a remedy is sought.<sup>69</sup>

[96] Mr. Hausman's submission is premised on Staff having been aware at the time of Mr. Rothstein's settlement that Mr. Rothstein had not spoken to Mr. Soave. The record in this case does not support this premise. Mr. Rothstein's settlement agreement was consistent with the evidence he provided to Staff in his second interview on January 24, 2017.<sup>70</sup> Christine George, a senior forensic accountant in the Enforcement Branch of the Commission who was the primary investigator in this matter and was called by Staff as a witness, testified that at the time of Mr. Rothstein's second interview, she did not have all the office telephone lines from CIBC's Thornhill branch.<sup>71</sup> In Mr. Rothstein's third interview on October 23, 2017, Staff said that since his prior interview, they had made further inquiries of CIBC and had obtained information which indicated that he had left a voicemail message on June 12, 2014 and had not spoken with Mr. Soave.<sup>72</sup> They then questioned him concerning this new information.

[97] Following this third interview, Staff amended the Statement of Allegations to delete the references to a telephone conversation, as well as making other corrections.<sup>73</sup> In the circumstances, this was the appropriate action. On the basis of the record in this proceeding, there is no support for Mr. Hausman's allegation concerning Staff's conduct.

Dated at Toronto this 4th day of February, 2019.

"Philip Anisman"

"Deborah Leckman"

"Robert P. Hutchison"

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<sup>67</sup> Exhibit 212, Amended Statement of Allegations, October 26, 2017, (2017) 40 OSCB 8817.

<sup>68</sup> See e.g. *RBC Dominion Securities Inc (Re)*, 2017 ONSC 24, (2017) 40 OSCB 5551 at para 13; *Assante Capital Management Ltd (Re)*, 2017 ONSC 45, (2018) 41 OSCB 99 at para 7(h).

<sup>69</sup> See *Ontario Securities Commission Rules of Procedure and Forms*, (2017) 40 OSCB 8988, rr 17 and 28. An application or motion would require a full record. For example, the Panel was not provided with the panel's reasons for approving Mr. Rothstein's settlement; see *Cheng (Re)*, 2017 ONSC 14, (2017) 40 OSCB 4451. When referring to the facts admitted in the settlement agreement, the panel said those "facts remain unproven against the remaining respondents" (para 3). In summarizing the facts, they said only that Mr. Rothstein "contacted Frank Soave" and the following day "provided further confidential information" to him (para 8).

<sup>70</sup> Exhibit 234, Settlement Agreement with Mr. Rothstein; (2017) 40 OSCB 3718; and see para 38, above.

<sup>71</sup> Transcript, September 7, 2018 at 150, lines 1-11.

<sup>72</sup> See para 39, above.

<sup>73</sup> Exhibit 212, Amended Statement of Allegations, October 26, 2017; (2017) 40 OSCB 8817; Exhibit 213, Blacklined Amended Statement of Allegations.

**APPENDIX**  
**Chronology of Events, June 11-13, 2014\***

**Wednesday, June 11, 2014 – JD Rothstein Contacts Frank Soave**

Time	Event	From	To	Description
11:49 AM	Email	JD Rothstein	CIBC Thornhill Branch Manager (BM)	Re: Could we have a chat today? "Hope you are well. Cheers, JD"
11:54 AM	Call	JD Rothstein	Frank Soave	Call from Rothstein (office) (1 minute) to Soave (cell) (no record of call received)
11:55 AM	SMS	JD Rothstein	Frank Soave	<b>"Call me if you get a chance. Thx"</b>
12:00 PM	Lunch			Ben Cheng, JD Rothstein and others attended lunch with [*third party] at Aston Hill offices
12:12 PM	Email	Ben Cheng	JD Rothstein	"Boardroom. Come on down."
12:16 PM	Email	BMO InvestorLine	JD Rothstein	Re: Your email address has been updated
1:00 PM	Email	BM	JD Rothstein	Re: Could we have a chat today? "At my desk"
2:09 PM	Call	JD Rothstein	BM	Call from Rothstein (office) (15 minutes) to BM (office)
2:49 PM	Trade			JD Rothstein buys 700 Amaya shares in Rothstein trading account at BMO InvestorLine [Market order filled at \$11.875 for \$8,322]
2:50 PM	Call	JD Rothstein	BM	Call from Rothstein (office) (1 minute) to BM (office)
2:56 PM	Call	JD Rothstein	Frank Soave	Call from Rothstein (office) (1 minute) to Soave (cell) (no record of call received)
3:30 PM	Taxi			Cheng taxi pickup for airport
3:49 PM	Email	JD Rothstein	Eric Tremblay	Re: Argent Feedback "Eric, I ain't going to lie that I'm doing some damage control at CIBC currently ... I am doing my best to ease the situation so that these guys will be more receptive in a few months from now."
4:05 PM	SMS	JD Rothstein	Frank Soave	<b>"AYA"</b>
4:09 PM	Call	JD Rothstein	BM	Call from Rothstein (office) (3 minutes) to BM (office)
5:40 PM	Flight			Cheng/Killeen/LT [*LT was an AHAM employee]/Tremblay flight Toronto to New York
7:04 PM	Email	JD Rothstein	LA [*LA was an employee at AHAM]	JD Rothstein just left the Aston office

\* Boldfaced words in the description column are boldfaced in Exhibit 57; the Panel's additions are identified by an asterisk.

**Reasons: Decisions, Orders and Rulings**

Time	Event	From	To	Description
7:35 PM	Arrival			Cheng/Killeen/LT/Tremblay – arrival in New York
7:58 PM	SMS	Frank Soave	JD Rothstein	<b>“Sorry never owned it should I”</b>
8:13 PM	SMS	JD Rothstein	Frank Soave	<b>“Yes”</b>
9:25 PM	Flight			Cheng/Killeen/LT/Tremblay flight from New York to Brazil

**Thursday, June 12, 2014 – Frank Soave Buys Amaya Shares**

Time	Event	From	To	Description
7:55 AM	Flight			JD Rothstein – Toronto to Sudbury
8:20 AM	Arrival			Cheng/Killeen/LT/Tremblay – arrival in Brazil
9:01 AM	Arrival			JD Rothstein – arrival in Sudbury
9:07 AM*	News			Bloomberg Article
9:45 AM	Call	Rothstein JD	Frank Soave	JD Rothstein (cell) (1 minute, 19 seconds) calls Frank Soave (cell) (voicemail message)
10:10 AM	Call	Frank Soave	Frank Soave	Frank Soave (office) (1 minute, 4 seconds) calls Frank Soave (cell)
10:15 AM	Email	Frank Soave	JD Rothstein	Re: <b>Thanks</b>
10:15 AM*	Email	SeekingAlpha	Frank Soave	“Blackstone investor day: Rooting for a correction”
10:18 AM	Email	JD Rothstein	Frank Soave	Re: Thanks <b>“Blackrock, blackstone and another huge one behind it”</b>
10:35 AM	Trade			Frank Soave bought 5,000 shares for \$60,755
12:22 PM	News			Amaya Gaming Group Inc. stock (TSX: AYA) is halted by IIROC
1:23 PM	SMS	Frank Soave	JD Rothstein	<b>“Wholy [sic] Shit”</b>
1:23 PM	SMS	Frank Soave	Jordan Zale	“Did u see AYA”
1:24 PM	SMS	Jordan Zale	Frank Soave	“No what happenned [sic]”
1:24 PM	SMS	Frank Soave	Jordan Zale	“Up \$2”
1:25 PM	PIN	Frank Soave	Soave’s Assistant (JW)	“How many AYA did I buy today”
1:28 PM	PIN	JW	Frank Soave	“5000”
1:29 PM	PIN	Frank Soave	JW	“Shit I wish I had bought more”
1:30 PM	PIN	JW	Frank Soave	“Smooth move Frank. Where did you get that tip?”
2:06 PM	PIN	Frank Soave	JW	“Did it reopen”
2:07 PM	PIN	JW	Frank Soave	“Yes bid and. Ask 14.04”

Time	Event	From	To	Description
2:11 PM	SMS	Frank Soave	Jordan Zale	"What's going on with AYA"
2:34 PM	SMS	Jordan Zale	Frank Soave	"Halted"
2:36 PM	SMS	Frank Soave	Jordan Zale	"Still"
2:37 PM	SMS	Jordan Zale	Frank Soave	"Yes"
2:40 PM	PIN	Frank Soave	JW	"Are u sure it's trading"
2:41 PM	PIN	JW	Frank Soave	"No it actually not trading ... sorry"
3:26 PM	SMS	Frank Soave	Jordan Zale	"What are u hearing? Do u own any?"
3:27 PM	SMS	Jordan Zale	Frank Soave	"None"
3:30 PM	Flight			JD Rothstein flight from Sudbury to Toronto
4:38 PM	Arrival			JD Rothstein – arrival in Toronto
6:01 PM	SMS	Jordan Zale	Frank Soave	"Call me when u have a minute. Tks"
9:24 PM	News			Amaya Press Release re: PokerStars transaction

## Friday, June 13, 2014 – Frank Soave Sells Amaya Shares

Time	Event	From	To	Description
8:24 AM	Email	Jordan Zale	Frank Soave	Re: you are rich "Pre market on aya is 19.05"
Before markets open	Trade			Frank Soave cancels the 5,000 buy trade in his spouse's CASH trading account and buys Amaya for a total of 5,000 shares in three trading accounts: 850 shares in his spouse's CASH account, 2,370 shares in her TFSA account and 1,780 shares in Frank Soave's TFSA account.
9:32 AM	Trade			Frank Soave sold all the 1,780 Amaya shares in his TFSA trading account [Limit order at \$19.95, filled immediately at \$20.00]
9:33 AM	Trade			Frank Soave sold all the 2,370 Amaya shares in his spouse's TFSA trading account [Limit order at 9:33:15 at \$19.90, changed at 9:33:51 to \$19.65, filled by 9:35:22 at average price of \$19.73]
9:38 AM	SMS	Frank Soave	JD Rothstein	"Thank You"
9:42 AM	SMS	Frank Soave	BBT	"AYA" [*BBT is a colleague at another CIBC branch office]
9:45 AM	SMS	BBT	Frank Soave	"Wow! Clairvoyant or what?"
9:50 AM	Email	Frank Soave	KS	Re: Were u long AYA [*KS was a business associate of Soave]
10:04 AM	Email	Frank Soave	DM	Re: Tell me you are still long AYA!!!!!!!!!!!!!! [*DM was a business associate of Soave]

**Reasons: Decisions, Orders and Rulings**

Time	Event	From	To	Description
10:31 AM	Call	JD Rothstein	Frank Soave	Call from Rothstein (office) (1 minute) to Soave (cell) (no record of call received)
10:54 AM	SMS	JD Rothstein	Frank Soave	<b>"Unbelievable"</b>
12:16 PM	Trade			Frank Soave sold all the 850 Amaya shares in his spouse's Cash trading account [Limit order at \$19.77, filled immediately at \$19.77]
12:18 PM	SMS	Frank Soave	JD Rothstein	<b>"What fund won on the Trade"</b>
12:21 PM	Email	JD Rothstein	AHAM gaming analyst ( <b>MK</b> )	Re: Which funds got an allotment to Amaya?
12:33 PM	Email	MK	JD Rothstein	Re: Which funds got an allotment to Amaya "We are participating but have not been given out [sic] total fill yet"
3:54 PM	Trade			JD Rothstein sold all the 700 Amaya shares in the Rothstein [*trading] account [Market order filled at \$19.77 for \$13,829]
4:47 PM*	Email	Frank Soave	LG (client)	"How did you do with Amaya a gaming today?"
4:57 PM*	Email	LG	Frank Soave	"Most I ever made on one stock. I did not sell yet. What is your advise [sic]"
5:11 PM*	Email	Frank Soave	LG	"I had 5000 I sold did u get any of the issue at \$20"
5:13 PM*	Email	Frank Soave	BM	Re: Did u own any Amaya
5:17 PM*	Email	BM	Frank Soave	Re: Did u own any Amaya: "Yes"
5:21 PM*	Email	Frank Soave	BM	Re: Did u own any Amaya: "Big"
5:22 PM*	Email	BM	Frank Soave	Re: Did u own any Amaya: "Not much"
5:22 PM*	Email	Frank Soave	BM	Re: Did u own any Amaya: "Pro or client I had 5000"

## Chapter 4

# Cease Trading Orders

### 4.1.1 Temporary, Permanent & Rescinding Issuer Cease Trading Orders

Company Name	Date of Temporary Order	Date of Hearing	Date of Permanent Order	Date of Lapse/Revoke
Rosehearty Energy Inc.	12 May 2015	25 May 2015	25 May 2015	30 January 2019

### Failure to File Cease Trade Orders

Company Name	Date of Order	Date of Revocation
Abattis Bioceuticals Corp.	01 February 2019	
Azema Sciences Inc.	04 February 2019	
Bexar Ventures Inc.	01 February 2019	
Biosenta Inc.	01 February 2019	
Braille Energy Systems Inc.	01 February 2019	
DMG Blockchain Solutions Inc.	01 February 2019	
Global Gardens Group Inc.	01 February 2019	
Grand Peak Capital Corp.	01 February 2019	
Greenshield Explorations Limited	01 February 2019	
Mag One Products Inc.	01 February 2019	
Pepcap Resources, Inc.	01 February 2019	
ProSmart Enterprises Inc.	01 February 2019	
Silk Road Energy Inc.	01 February 2019	

### 4.2.1 Temporary, Permanent & Rescinding Management Cease Trading Orders

Company Name	Date of Order	Date of Lapse
Leviathan Cannabis Group Inc.	07 January 2019	04 February 2019
LGC Capital Ltd.	30 January 2019	

### 4.2.2 Outstanding Management & Insider Cease Trading Orders

Company Name	Date of Order or Temporary Order	Date of Hearing	Date of Permanent Order	Date of Lapse/Expire	Date of Issuer Temporary Order
Performance Sports Group Ltd.	19 October 2016	31 October 2016	31 October 2016		

**Cease Trading Orders**

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<b>Company Name</b>	<b>Date of Order</b>	<b>Date of Lapse</b>
Blocplay Entertainment Inc.	04 December 2018	
LGC Capital Ltd.	30 January 2019	
Katanga Mining Limited	15 August 2017	
Leviathan Cannabis Group Inc.	07 January 2019	04 February 2019



## Chapter 5

# Rules and Policies

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### 5.1.1 Arrangements Regarding the Access, Collection, Storage and Use of Derivatives Data

#### ARRANGEMENT REGARDING THE ACCESS, COLLECTION, STORAGE AND USE OF DERIVATIVES DATA

This Arrangement is made as of the 24<sup>th</sup> day of January 2019 (the “Effective Date”).

#### **BETWEEN:**

**Service NL, Government of Newfoundland and Labrador (“Partner Jurisdiction”)**

-- and --

**Ontario Securities Commission (“OSC”)**

#### **PURPOSE**

The purpose of this Arrangement is to set out the understanding between the Partner Jurisdiction and the OSC with respect to

- the OSC’s role in acting as agent for the Partner Jurisdiction for the purposes of accessing, collecting, storing, analysing and reporting on data reported to a recognized trade repository pursuant to Multilateral Instrument 96-101 *Trade Repositories and Derivatives Data Reporting* (“MI 96-101”), and
- the OSC’s use of such data.

#### **DEFINITIONS**

For the purposes of this Arrangement:

- 1(1) “Partner Jurisdiction data” means data related to a local counterparty of the Partner Jurisdiction that is held at a recognized trade repository and is reportable pursuant to Part 3 of MI 96-101, and includes any documents, analysis and reports generated by the OSC for the Partner Jurisdiction exclusively using that data.
- 1(2) “OSC data” means data related to an Ontario local counterparty that is held at a recognized trade repository that is reportable pursuant to Part 3 of OSC 91-507, and includes any documents, analysis and reports generated by the OSC exclusively using that data and/or using that data commingled with Partner Jurisdiction data as permitted under section 5 of this Arrangement.

#### **APPOINTMENT OF AGENT**

- 2(1) The Partner Jurisdiction appoints the OSC to act as agent of the Partner Jurisdiction for the purpose of accessing, collecting, storing, analysing and reporting on Partner Jurisdiction data.

- 2(2) The Partner Jurisdiction and OSC will act in compliance with applicable laws in respect of matters under this Arrangement.

#### **SCOPE OF ACTIVITIES UNDERTAKEN ON BEHALF OF THE PARTNER JURISDICTION**

- 3(1) The OSC agrees to access and collect Partner Jurisdiction data from a recognized trade repository and to store the data on behalf of the Partner Jurisdiction.
- 3(2) The OSC agrees to provide the Partner Jurisdiction with regular market, participant and product reports on the Partner Jurisdiction data, the frequency, content and format of which will be mutually agreed upon from time to time by both parties.
- 3(3) In the event the Partner Jurisdiction or the OSC wants to make changes to the activities undertaken by the OSC on its behalf, the changes will be discussed and mutually agreed upon in writing by the parties.
- 3(4) The OSC will not charge fees for the activities undertaken under this Arrangement. In the event that the Partner Jurisdiction requests special or non-standard reports, the customized treatment of data or increased data capabilities, the OSC will determine the incremental costs of undertaking such activities and the parties will agree to a reasonable fee.

#### **INTELLECTUAL PROPERTY**

- 4(1) The Partner Jurisdiction owns and retains all right, title and interest (including intellectual property rights) in and to the Partner Jurisdiction data.
- 4(2) The OSC owns and retains all right, title and interest (including intellectual property rights) in and to OSC data.
- 4(3) The OSC may access and use Partner Jurisdiction data to undertake the activities on behalf of the Partner Jurisdiction and as otherwise permitted under Section 5. The OSC will own any data models and the format of any reports it generates for the Partner Jurisdiction under this Arrangement, but not the content.

#### **OSC USE OF PARTNER JURISDICTION DATA AND OSC DATA**

- 5(1) The Partner Jurisdiction agrees that the OSC may access, collect, store, perform quality analysis, commingle and use Partner Jurisdiction data in connection with the fulfillment of its regulatory mandate, including but not limited to market and product analysis, policy development, and systemic risk assessment.
- 5(2) The Partner Jurisdiction agrees that the OSC may also use and disclose the Partner Jurisdiction data collected hereunder for enforcement purposes where appropriate. In these circumstances, the OSC will provide a minimum of three (3) business days' notice to the Partner Jurisdiction prior to the commencement of any administrative proceedings under the *Ontario Securities Act* or the *Commodity Futures Act*, quasi-criminal proceedings or criminal proceedings.
- 5(3) For greater certainty, no restrictions apply and no reasonable notice is required to be given to the Partner Jurisdiction in respect of the OSC's use of OSC data.

## **CONFIDENTIALITY AND FREEDOM OF INFORMATION REQUESTS**

- 6(1) Except as may be required or permitted by law, or as contemplated by subsections 5(1) and 5(2), or otherwise with the consent of the Partner Jurisdiction, and subject to what is already public information, the OSC agrees to keep Partner Jurisdiction Data in confidence, including for greater certainty individual transaction data or data that identifies individual counterparties or transactions, both during the period of this Arrangement and at any time after.
- 6(2) Subject to section 5 and subsection 6(1), the OSC agrees not to disclose Partner Jurisdiction data to any third party without the prior written consent of the Partner Jurisdiction, both during the period of this Arrangement and at any time after.
- 6(3) The Partner Jurisdiction acknowledges that freedom of information legislation in Ontario applies to and governs all records in the custody or under the control of the OSC. In the event that the OSC receives an information request that relates to Partner Jurisdiction data or enforcement files related to Partner Jurisdiction data, the OSC will notify the Partner Jurisdiction and will not disclose any information related to the request unless required to do so by law.

## **DATA SECURITY**

- 7(1) The OSC agrees to hold and transmit Partner Jurisdiction data in a secure manner and in accordance with its own standards, policies and procedures.
- 7(2) The OSC agrees to restrict access to Partner Jurisdiction data to OSC personnel who require access to such data for the purpose of undertaking the activities on behalf of the Partner Jurisdiction in accordance with this Arrangement, or for another regulatory or enforcement purpose permitted under this Arrangement.
- 7(3) The OSC will advise the Partner Jurisdiction as soon as reasonably possible in the event there is a data security breach related to Partner Jurisdiction data.

## **TERMINATION**

- 8(1) Any party may terminate its participation in this Arrangement upon giving ninety (90) business days' notice in writing to the other parties.
- 8(2) Upon termination of this Arrangement, the OSC must transfer and deliver to the Partner Jurisdiction all Partner Jurisdiction data.
- 8(3) Following termination of this Arrangement and upon the Partner Jurisdiction's written request, the OSC must destroy all Partner Jurisdiction data in its possession or under its control. For greater certainty, the OSC will retain OSC data in accordance with its own records retention requirements.

## **NOTICE**

- 9(1) Any notice under this Arrangement must be in writing and be delivered personally to the party to whom it is given or sent by courier, by prepaid registered mail, or by electronic mail, addressed as follows:

To the Government of Newfoundland and Labrador:

**Superintendent of Securities**

**Service NL**

P.O. Box 8700, St. John's, NL A1B 4i6

**Attention:** Renee Dyer, Director, Financial Services Regulation Division

Tel: 709-729-4909

E-mail: reneedyer@gov.nl.ca

To the OSC:

**Ontario Securities Commission**

20 Queen Street W., 22nd Floor

Toronto, ON M5H 3S8

Attention: Kevin Fine, Director of Derivatives

Tel: 416-593-8109

E-mail: kfine@osc.gov.on.ca

**EFFECTIVE DATE**

- 10(1) Cooperation in accordance with this Arrangement will begin on the Effective Date provided that the OSC has obtained its endorsement by the applicable Ministry in accordance with the applicable legislation.

**Government of Newfoundland and Labrador**

**Per:** << "Renee Dyer" >>

Renee Dyer, Director

**Date:** 4 Dec 2018

**Ontario Securities Commission**

<< "Maureen Jensen" >>

Maureen Jensen, Chair

**Date:** 10 Dec 2018

**ARRANGEMENT REGARDING THE  
ACCESS, COLLECTION, STORAGE AND USE OF DERIVATIVES DATA**

This Arrangement is made as of the 24<sup>th</sup> day of January 2019 (the “Effective Date”).

**BETWEEN:**

**Prince Edward Island Office of the Superintendent of Securities (“Partner Jurisdiction”)**

-- and --

**Ontario Securities Commission (“OSC”)**

**PURPOSE**

The purpose of this Arrangement is to set out the understanding between the Partner Jurisdiction and the OSC with respect to

- the OSC’s role in acting as agent for the Partner Jurisdiction for the purposes of accessing, collecting, storing, analysing and reporting on data reported to a recognized trade repository pursuant to Multilateral Instrument 96-101 *Trade Repositories and Derivatives Data Reporting* (“MI 96-101”), and
- the OSC’s use of such data.

**DEFINITIONS**

For the purposes of this Arrangement:

- 1(1) “Partner Jurisdiction data” means data related to a local counterparty of the Partner Jurisdiction that is held at a recognized trade repository and is reportable pursuant to Part 3 of MI 96-101, and includes any documents, analysis and reports generated by the OSC for the Partner Jurisdiction exclusively using that data.
- 1(2) “OSC data” means data related to an Ontario local counterparty that is held at a recognized trade repository that is reportable pursuant to Part 3 of OSC 91-507, and includes any documents, analysis and reports generated by the OSC exclusively using that data and/or using that data commingled with Partner Jurisdiction data as permitted under section 5 of this Arrangement.

**APPOINTMENT OF AGENT**

- 2(1) The Partner Jurisdiction appoints the OSC to act as agent of the Partner Jurisdiction for the purpose of accessing, collecting, storing, analysing and reporting on Partner Jurisdiction data.
- 2(2) The Partner Jurisdiction and OSC will act in compliance with applicable laws in respect of matters under this Arrangement.

**SCOPE OF ACTIVITIES UNDERTAKEN ON BEHALF OF THE PARTNER JURISDICTION**

- 3(1) The OSC agrees to access and collect Partner Jurisdiction data from a recognized trade repository and to store the data on behalf of the Partner Jurisdiction.

- 3(2) The OSC agrees to provide the Partner Jurisdiction with regular market, participant and product reports on the Partner Jurisdiction data, the frequency, content and format of which will be mutually agreed upon from time to time by both parties.
- 3(3) In the event the Partner Jurisdiction or the OSC wants to make changes to the activities undertaken by the OSC on its behalf, the changes will be discussed and mutually agreed upon in writing by the parties.
- 3(4) The OSC will not charge fees for the activities undertaken under this Arrangement. In the event that the Partner Jurisdiction requests special or non-standard reports, the customized treatment of data or increased data capabilities, the OSC will determine the incremental costs of undertaking such activities and the parties will agree to a reasonable fee.

#### **INTELLECTUAL PROPERTY**

- 4(1) The Partner Jurisdiction owns and retains all right, title and interest (including intellectual property rights) in and to the Partner Jurisdiction data.
- 4(2) The OSC owns and retains all right, title and interest (including intellectual property rights) in and to OSC data.
- 4(3) The OSC may access and use Partner Jurisdiction data to undertake the activities on behalf of the Partner Jurisdiction and as otherwise permitted under Section 5. The OSC will own any data models and the format of any reports it generates for the Partner Jurisdiction under this Arrangement, but not the content.

#### **OSC USE OF PARTNER JURISDICTION DATA AND OSC DATA**

- 5(1) The Partner Jurisdiction agrees that the OSC may access, collect, store, perform quality analysis, commingle and use Partner Jurisdiction data in connection with the fulfillment of its regulatory mandate, including but not limited to market and product analysis, policy development, and systemic risk assessment.
- 5(2) The Partner Jurisdiction agrees that the OSC may also use and disclose the Partner Jurisdiction data collected hereunder for enforcement purposes where appropriate. In these circumstances, the OSC will provide a minimum of three (3) business days' notice to the Partner Jurisdiction prior to the commencement of any administrative proceedings under the *Ontario Securities Act* or the *Commodity Futures Act*, quasi-criminal proceedings or criminal proceedings.
- 5(3) For greater certainty, no restrictions apply and no reasonable notice is required to be given to the Partner Jurisdiction in respect of the OSC's use of OSC data.

#### **CONFIDENTIALITY AND FREEDOM OF INFORMATION REQUESTS**

- 6(1) Except as may be required or permitted by law, or as contemplated by subsections 5(1) and 5(2), or otherwise with the consent of the Partner Jurisdiction, and subject to what is already public information, the OSC agrees to keep Partner Jurisdiction Data in confidence, including for greater certainty individual transaction data or data that identifies individual counterparties or transactions, both during the period of this Arrangement and at any time after.

- 6(2) Subject to section 5 and subsection 6(1), the OSC agrees not to disclose Partner Jurisdiction data to any third party without the prior written consent of the Partner Jurisdiction, both during the period of this Arrangement and at any time after.
- 6(3) The Partner Jurisdiction acknowledges that freedom of information legislation in Ontario applies to and governs all records in the custody or under the control of the OSC. In the event that the OSC receives an information request that relates to Partner Jurisdiction data or enforcement files related to Partner Jurisdiction data, the OSC will notify the Partner Jurisdiction and will not disclose any information related to the request unless required to do so by law.

#### **DATA SECURITY**

- 7(1) The OSC agrees to hold and transmit Partner Jurisdiction data in a secure manner and in accordance with its own standards, policies and procedures.
- 7(2) The OSC agrees to restrict access to Partner Jurisdiction data to OSC personnel who require access to such data for the purpose of undertaking the activities on behalf of the Partner Jurisdiction in accordance with this Arrangement, or for another regulatory or enforcement purpose permitted under this Arrangement.
- 7(3) The OSC will advise the Partner Jurisdiction as soon as reasonably possible in the event there is a data security breach related to Partner Jurisdiction data.

#### **TERMINATION**

- 8(1) Any party may terminate its participation in this Arrangement upon giving ninety (90) business days' notice in writing to the other parties.
- 8(2) Upon termination of this Arrangement, the OSC must transfer and deliver to the Partner Jurisdiction all Partner Jurisdiction data.
- 8(3) Following termination of this Arrangement and upon the Partner Jurisdiction's written request, the OSC must destroy all Partner Jurisdiction data in its possession or under its control. For greater certainty, the OSC will retain OSC data in accordance with its own records retention requirements.

#### **NOTICE**

- 9(1) Any notice under this Arrangement must be in writing and be delivered personally to the party to whom it is given or sent by courier, by prepaid registered mail, or by electronic mail, addressed as follows:

To the PEIOSS:

**Prince Edward Island Office of the Superintendent of Securities**

95 Rochford Street, PO Box 2000

**Attention:** Steve Dowling, Superintendent of Securities

Tel: 902-368-4551

E-mail: [sddowling@gov.pe.ca](mailto:sddowling@gov.pe.ca)

To the OSC:

**Ontario Securities Commission**

20 Queen Street W., 22nd Floor

Toronto, ON M5H 3S8

Attention: Kevin Fine, Director of Derivatives

Tel: 416-593-8109

E-mail: [kfine@osc.gov.on.ca](mailto:kfine@osc.gov.on.ca)

**EFFECTIVE DATE**

10(1) Cooperation in accordance with this Arrangement will begin on the Effective Date provided that the OSC has obtained its endorsement by the applicable Ministry in accordance with the applicable legislation.

**Financial and Consumer Services Commission**

**Per:** << "Steve Dowling" >>

Steve Dowling, Superintendent of Securities

**Date:** 12 Sept 2018

**Ontario Securities Commission**

<< "Maureen Jensen" >>

Maureen Jensen, Chair

**Date:** 10 Dec 2018



**ARRANGEMENT REGARDING THE  
ACCESS, COLLECTION, STORAGE AND USE OF DERIVATIVES DATA**

This Arrangement is made as of the 24<sup>th</sup> day of January 2019 (the “Effective Date”).

**BETWEEN:**

**Office of the Superintendent of Securities, Northwest Territories (“Partner Jurisdiction”)**

-- and --

**Ontario Securities Commission (“OSC”)**

**PURPOSE**

The purpose of this Arrangement is to set out the understanding between the Partner Jurisdiction and the OSC with respect to

- the OSC’s role in acting as agent for the Partner Jurisdiction for the purposes of accessing, collecting, storing, analysing and reporting on data reported to a recognized trade repository pursuant to Multilateral Instrument 96-101 *Trade Repositories and Derivatives Data Reporting* (“MI 96-101”), and
- the OSC’s use of such data.

**DEFINITIONS**

For the purposes of this Arrangement:

- 1(1) “Partner Jurisdiction data” means data related to a local counterparty of the Partner Jurisdiction that is held at a recognized trade repository and is reportable pursuant to Part 3 of MI 96-101, and includes any documents, analysis and reports generated by the OSC for the Partner Jurisdiction exclusively using that data.
- 1(2) “OSC data” means data related to an Ontario local counterparty that is held at a recognized trade repository that is reportable pursuant to Part 3 of OSC 91-507, and includes any documents, analysis and reports generated by the OSC exclusively using that data and/or using that data commingled with Partner Jurisdiction data as permitted under section 5 of this Arrangement.

**APPOINTMENT OF AGENT**

- 2(1) The Partner Jurisdiction appoints the OSC to act as agent of the Partner Jurisdiction for the purpose of accessing, collecting, storing, analysing and reporting on Partner Jurisdiction data.
- 2(2) The Partner Jurisdiction and OSC will act in compliance with applicable laws in respect of matters under this Arrangement.

**SCOPE OF ACTIVITIES UNDERTAKEN ON BEHALF OF THE PARTNER JURISDICTION**

- 3(1) The OSC agrees to access and collect Partner Jurisdiction data from a recognized trade repository and to store the data on behalf of the Partner Jurisdiction.

- 3(2) The OSC agrees to provide the Partner Jurisdiction with regular market, participant and product reports on the Partner Jurisdiction data, the frequency, content and format of which will be mutually agreed upon from time to time by both parties.
- 3(3) In the event the Partner Jurisdiction or the OSC wants to make changes to the activities undertaken by the OSC on its behalf, the changes will be discussed and mutually agreed upon in writing by the parties.
- 3(4) The OSC will not charge fees for the activities undertaken under this Arrangement. In the event that the Partner Jurisdiction requests special or non-standard reports, the customized treatment of data or increased data capabilities, the OSC will determine the incremental costs of undertaking such activities and the parties will agree to a reasonable fee.

#### **INTELLECTUAL PROPERTY**

- 4(1) The Partner Jurisdiction owns and retains all right, title and interest (including intellectual property rights) in and to the Partner Jurisdiction data.
- 4(2) The OSC owns and retains all right, title and interest (including intellectual property rights) in and to OSC data.
- 4(3) The OSC may access and use Partner Jurisdiction data to undertake the activities on behalf of the Partner Jurisdiction and as otherwise permitted under Section 5. The OSC will own any data models and the format of any reports it generates for the Partner Jurisdiction under this Arrangement, but not the content.

#### **OSC USE OF PARTNER JURISDICTION DATA AND OSC DATA**

- 5(1) The Partner Jurisdiction agrees that the OSC may access, collect, store, perform quality analysis, commingle and use Partner Jurisdiction data in connection with the fulfillment of its regulatory mandate, including but not limited to market and product analysis, policy development, and systemic risk assessment.
- 5(2) The Partner Jurisdiction agrees that the OSC may also use and disclose the Partner Jurisdiction data collected hereunder for enforcement purposes where appropriate. In these circumstances, the OSC will provide a minimum of three (3) business days' notice to the Partner Jurisdiction prior to the commencement of any administrative proceedings under the *Ontario Securities Act* or the *Commodity Futures Act*, quasi-criminal proceedings or criminal proceedings.
- 5(3) For greater certainty, no restrictions apply and no reasonable notice is required to be given to the Partner Jurisdiction in respect of the OSC's use of OSC data.

#### **CONFIDENTIALITY AND FREEDOM OF INFORMATION REQUESTS**

- 6(1) Except as may be required or permitted by law, or as contemplated by subsections 5(1) and 5(2), or otherwise with the consent of the Partner Jurisdiction, and subject to what is already public information, the OSC agrees to keep Partner Jurisdiction Data in confidence, including for greater certainty individual transaction data or data that identifies individual counterparties or transactions, both during the period of this Arrangement and at any time after.

- 6(2) Subject to section 5 and subsection 6(1), the OSC agrees not to disclose Partner Jurisdiction data to any third party without the prior written consent of the Partner Jurisdiction, both during the period of this Arrangement and at any time after.
- 6(3) The Partner Jurisdiction acknowledges that freedom of information legislation in Ontario applies to and governs all records in the custody or under the control of the OSC. In the event that the OSC receives an information request that relates to Partner Jurisdiction data or enforcement files related to Partner Jurisdiction data, the OSC will notify the Partner Jurisdiction and will not disclose any information related to the request unless required to do so by law.

#### **DATA SECURITY**

- 7(1) The OSC agrees to hold and transmit Partner Jurisdiction data in a secure manner and in accordance with its own standards, policies and procedures.
- 7(2) The OSC agrees to restrict access to Partner Jurisdiction data to OSC personnel who require access to such data for the purpose of undertaking the activities on behalf of the Partner Jurisdiction in accordance with this Arrangement, or for another regulatory or enforcement purpose permitted under this Arrangement.
- 7(3) The OSC will advise the Partner Jurisdiction as soon as reasonably possible in the event there is a data security breach related to Partner Jurisdiction data.

#### **TERMINATION**

- 8(1) Any party may terminate its participation in this Arrangement upon giving ninety (90) business days' notice in writing to the other parties.
- 8(2) Upon termination of this Arrangement, the OSC must transfer and deliver to the Partner Jurisdiction all Partner Jurisdiction data.
- 8(3) Following termination of this Arrangement and upon the Partner Jurisdiction's written request, the OSC must destroy all Partner Jurisdiction data in its possession or under its control. For greater certainty, the OSC will retain OSC data in accordance with its own records retention requirements.

#### **NOTICE**

- 9(1) Any notice under this Arrangement must be in writing and be delivered personally to the party to whom it is given or sent by courier, by prepaid registered mail, or by electronic mail, addressed as follows:

To the Office of the Superintendent of Securities, Northwest Territories:

**Office of the Superintendent of Securities, Northwest Territories**

**GNWT Department of Justice, Legal Registries Division**

PO Box 1320

**Yellowknife, NT**

X1A 2L9

**Attention:** Thomas W. Hall, Superintendent of Securities

Tel: 867-767-9305

E-mail: Tom\_Hall@gov.nt.ca

To the OSC:

**Ontario Securities Commission**

20 Queen Street W., 22nd Floor

Toronto, ON M5H 3S8

Attention: Kevin Fine, Director of Derivatives

Tel: 416-593-8109

E-mail: [kfine@osc.gov.on.ca](mailto:kfine@osc.gov.on.ca)

**EFFECTIVE DATE**

10(1) Cooperation in accordance with this Arrangement will begin on the Effective Date provided that the OSC has obtained its endorsement by the applicable Ministry in accordance with the applicable legislation.

**Office of the Superintendent of Securities,  
Northwest Territories**

**Per:** << "Thomas W. Hall" >>

Thomas W. Hall, Superintendent of Securities

**Date:** 31 Aug 2018

**Ontario Securities Commission**

<< "Maureen Jensen" >>

Maureen Jensen, Chair

**Date:** 10 Dec 2018

**ARRANGEMENT REGARDING THE  
ACCESS, COLLECTION, STORAGE AND USE OF DERIVATIVES DATA**

This Arrangement is made as of the 24<sup>th</sup> day of January 2019 (the “Effective Date”).

**BETWEEN:**

**Office of the Superintendent of Securities, Nunavut (“Partner Jurisdiction”)**

-- and --

**Ontario Securities Commission (“OSC”)**

**PURPOSE**

The purpose of this Arrangement is to set out the understanding between the Partner Jurisdiction and the OSC with respect to

- the OSC’s role in acting as agent for the Partner Jurisdiction for the purposes of accessing, collecting, storing, analysing and reporting on data reported to a recognized trade repository pursuant to Multilateral Instrument 96-101 *Trade Repositories and Derivatives Data Reporting* (“MI 96-101”), and
- the OSC’s use of such data.

**DEFINITIONS**

For the purposes of this Arrangement:

- 1(1) “Partner Jurisdiction data” means data related to a local counterparty of the Partner Jurisdiction that is held at a recognized trade repository and is reportable pursuant to Part 3 of MI 96-101, and includes any documents, analysis and reports generated by the OSC for the Partner Jurisdiction exclusively using that data.
- 1(2) “OSC data” means data related to an Ontario local counterparty that is held at a recognized trade repository that is reportable pursuant to Part 3 of OSC 91-507, and includes any documents, analysis and reports generated by the OSC exclusively using that data and/or using that data commingled with Partner Jurisdiction data as permitted under section 5 of this Arrangement.

**APPOINTMENT OF AGENT**

- 2(1) The Partner Jurisdiction appoints the OSC to act as agent of the Partner Jurisdiction for the purpose of accessing, collecting, storing, analysing and reporting on Partner Jurisdiction data.
- 2(2) The Partner Jurisdiction and OSC will act in compliance with applicable laws in respect of matters under this Arrangement.

**SCOPE OF ACTIVITIES UNDERTAKEN ON BEHALF OF THE PARTNER JURISDICTION**

- 3(1) The OSC agrees to access and collect Partner Jurisdiction data from a recognized trade repository and to store the data on behalf of the Partner Jurisdiction.

- 3(2) The OSC agrees to provide the Partner Jurisdiction with regular market, participant and product reports on the Partner Jurisdiction data, the frequency, content and format of which will be mutually agreed upon from time to time by both parties.
- 3(3) In the event the Partner Jurisdiction or the OSC wants to make changes to the activities undertaken by the OSC on its behalf, the changes will be discussed and mutually agreed upon in writing by the parties.
- 3(4) The OSC will not charge fees for the activities undertaken under this Arrangement. In the event that the Partner Jurisdiction requests special or non-standard reports, the customized treatment of data or increased data capabilities, the OSC will determine the incremental costs of undertaking such activities and the parties will agree to a reasonable fee.

#### **INTELLECTUAL PROPERTY**

- 4(1) The Partner Jurisdiction owns and retains all right, title and interest (including intellectual property rights) in and to the Partner Jurisdiction data.
- 4(2) The OSC owns and retains all right, title and interest (including intellectual property rights) in and to OSC data.
- 4(3) The OSC may access and use Partner Jurisdiction data to undertake the activities on behalf of the Partner Jurisdiction and as otherwise permitted under Section 5. The OSC will own any data models and the format of any reports it generates for the Partner Jurisdiction under this Arrangement, but not the content.

#### **OSC USE OF PARTNER JURISDICTION DATA AND OSC DATA**

- 5(1) The Partner Jurisdiction agrees that the OSC may access, collect, store, perform quality analysis, commingle and use Partner Jurisdiction data in connection with the fulfillment of its regulatory mandate, including but not limited to market and product analysis, policy development, and systemic risk assessment.
- 5(2) The Partner Jurisdiction agrees that the OSC may also use and disclose the Partner Jurisdiction data collected hereunder for enforcement purposes where appropriate. In these circumstances, the OSC will provide a minimum of three (3) business days' notice to the Partner Jurisdiction prior to the commencement of any administrative proceedings under the *Ontario Securities Act* or the *Commodity Futures Act*, quasi-criminal proceedings or criminal proceedings.
- 5(3) For greater certainty, no restrictions apply and no reasonable notice is required to be given to the Partner Jurisdiction in respect of the OSC's use of OSC data.

#### **CONFIDENTIALITY AND FREEDOM OF INFORMATION REQUESTS**

- 6(1) Except as may be required or permitted by law, or as contemplated by subsections 5(1) and 5(2), or otherwise with the consent of the Partner Jurisdiction, and subject to what is already public information, the OSC agrees to keep Partner Jurisdiction Data in confidence, including for greater certainty individual transaction data or data that identifies individual counterparties or transactions, both during the period of this Arrangement and at any time after.

- 6(2) Subject to section 5 and subsection 6(1), the OSC agrees not to disclose Partner Jurisdiction data to any third party without the prior written consent of the Partner Jurisdiction, both during the period of this Arrangement and at any time after.
- 6(3) The Partner Jurisdiction acknowledges that freedom of information legislation in Ontario applies to and governs all records in the custody or under the control of the OSC. In the event that the OSC receives an information request that relates to Partner Jurisdiction data or enforcement files related to Partner Jurisdiction data, the OSC will notify the Partner Jurisdiction and will not disclose any information related to the request unless required to do so by law.

#### **DATA SECURITY**

- 7(1) The OSC agrees to hold and transmit Partner Jurisdiction data in a secure manner and in accordance with its own standards, policies and procedures.
- 7(2) The OSC agrees to restrict access to Partner Jurisdiction data to OSC personnel who require access to such data for the purpose of undertaking the activities on behalf of the Partner Jurisdiction in accordance with this Arrangement, or for another regulatory or enforcement purpose permitted under this Arrangement.
- 7(3) The OSC will advise the Partner Jurisdiction as soon as reasonably possible in the event there is a data security breach related to Partner Jurisdiction data.

#### **TERMINATION**

- 8(1) Any party may terminate its participation in this Arrangement upon giving ninety (90) business days' notice in writing to the other parties.
- 8(2) Upon termination of this Arrangement, the OSC must transfer and deliver to the Partner Jurisdiction all Partner Jurisdiction data.
- 8(3) Following termination of this Arrangement and upon the Partner Jurisdiction's written request, the OSC must destroy all Partner Jurisdiction data in its possession or under its control. For greater certainty, the OSC will retain OSC data in accordance with its own records retention requirements.

#### **NOTICE**

- 9(1) Any notice under this Arrangement must be in writing and be delivered personally to the party to whom it is given or sent by courier, by prepaid registered mail, or by electronic mail, addressed as follows:

To the OASN:

**Office of the Superintendent of Securities, Nunavut**

P.O. Box 1000, Station 570

Iqaluit, Nunavut, X0A0H0

**Attention:** Jeff Mason, Director, Legal Registries

Tel: 867-975-6591

E-mail: [jmason@gov.nu.ca](mailto:jmason@gov.nu.ca)

To the OSC:

**Ontario Securities Commission**

20 Queen Street W., 22nd Floor

Toronto, ON M5H 3S8

Attention: Kevin Fine, Director of Derivatives

Tel: 416-593-8109

E-mail: [kgine@osc.gov.on.ca](mailto:kgine@osc.gov.on.ca)

**EFFECTIVE DATE**

10(1) Cooperation in accordance with this Arrangement will begin on the Effective Date provided that the OSC has obtained its endorsement by the applicable Ministry in accordance with the applicable legislation.

**Office of the Superintendent of Securities,  
Nunavut**

**Ontario Securities Commission**

**Per:** << "Jeff Mason" >>

<< "Maureen Jensen" >>

Jeff Mason, Chair

Maureen Jensen, Chair

**Date:** 7 Sept 2018

**Date:** 10 Dec 2018



**ARRANGEMENT REGARDING THE  
ACCESS, COLLECTION, STORAGE AND USE OF DERIVATIVES DATA**

This Arrangement is made as of the 24<sup>th</sup> day of January 2019 (the “Effective Date”).

**BETWEEN:**

**Superintendent of Securities, Yukon (“Partner Jurisdiction”)**

-- and --

**Ontario Securities Commission (“OSC”)**

**PURPOSE**

The purpose of this Arrangement is to set out the understanding between the Partner Jurisdiction and the OSC with respect to

- the OSC’s role in acting as agent for the Partner Jurisdiction for the purposes of accessing, collecting, storing, analysing and reporting on data reported to a recognized trade repository pursuant to Multilateral Instrument 96-101 *Trade Repositories and Derivatives Data Reporting* (“MI 96-101”), and
- the OSC’s use of such data.

**DEFINITIONS**

For the purposes of this Arrangement:

- 1(1) “Partner Jurisdiction data” means data related to a local counterparty of the Partner Jurisdiction that is held at a recognized trade repository and is reportable pursuant to Part 3 of MI 96-101, and includes any documents, analysis and reports generated by the OSC for the Partner Jurisdiction exclusively using that data.
- 1(2) “OSC data” means data related to an Ontario local counterparty that is held at a recognized trade repository that is reportable pursuant to Part 3 of OSC 91-507, and includes any documents, analysis and reports generated by the OSC exclusively using that data and/or using that data commingled with Partner Jurisdiction data as permitted under section 5 of this Arrangement.

**APPOINTMENT OF AGENT**

- 2(1) The Partner Jurisdiction appoints the OSC to act as agent of the Partner Jurisdiction for the purpose of accessing, collecting, storing, analysing and reporting on Partner Jurisdiction data.
- 2(2) The Partner Jurisdiction and OSC will act in compliance with applicable laws in respect of matters under this Arrangement.

**SCOPE OF ACTIVITIES UNDERTAKEN ON BEHALF OF THE PARTNER JURISDICTION**

- 3(1) The OSC agrees to access and collect Partner Jurisdiction data from a recognized trade repository and to store the data on behalf of the Partner Jurisdiction.

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- 3(3) In the event the Partner Jurisdiction or the OSC wants to make changes to the activities undertaken by the OSC on its behalf, the changes will be discussed and mutually agreed upon in writing by the parties.
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#### **INTELLECTUAL PROPERTY**

- 4(1) The Partner Jurisdiction owns and retains all right, title and interest (including intellectual property rights) in and to the Partner Jurisdiction data.
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- 5(1) The Partner Jurisdiction agrees that the OSC may access, collect, store, perform quality analysis, commingle and use Partner Jurisdiction data in connection with the fulfillment of its regulatory mandate, including but not limited to market and product analysis, policy development, and systemic risk assessment.
- 5(2) The Partner Jurisdiction agrees that the OSC may also use and disclose the Partner Jurisdiction data collected hereunder for enforcement purposes where appropriate. In these circumstances, the OSC will provide a minimum of three (3) business days' notice to the Partner Jurisdiction prior to the commencement of any administrative proceedings under the *Ontario Securities Act* or the *Commodity Futures Act*, quasi-criminal proceedings or criminal proceedings.
- 5(3) For greater certainty, no restrictions apply and no reasonable notice is required to be given to the Partner Jurisdiction in respect of the OSC's use of OSC data.

#### **CONFIDENTIALITY AND FREEDOM OF INFORMATION REQUESTS**

- 6(1) Except as may be required or permitted by law, or as contemplated by subsections 5(1) and 5(2), or otherwise with the consent of the Partner Jurisdiction, and subject to what is already public information, the OSC agrees to keep Partner Jurisdiction Data in confidence, including for greater certainty individual transaction data or data that identifies individual counterparties or transactions, both during the period of this Arrangement and at any time after.

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#### **DATA SECURITY**

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#### **NOTICE**

- 9(1) Any notice under this Arrangement must be in writing and be delivered personally to the party to whom it is given or sent by courier, by prepaid registered mail, or by electronic mail, addressed as follows:

To the Superintendent of Securities, Yukon:

**The Office of the Yukon Superintendent of Securities**

307 Black Street

**Whitehorse, Yukon, Y1A 2N1**

**Attention:** Rhonda Horte, Deputy Superintendent of Securities

Tel: (867) 667-5466

E-mail: Rhonda.Horte@gov.yk.ca

To the OSC:

**Ontario Securities Commission**

20 Queen Street W., 22nd Floor

Toronto, ON M5H 3S8

Attention: Kevin Fine, Director of Derivatives

Tel: 416-593-8109

E-mail: [kfine@osc.gov.on.ca](mailto:kfine@osc.gov.on.ca)

**EFFECTIVE DATE**

10(1) Cooperation in accordance with this Arrangement will begin on the Effective Date provided that the OSC has obtained its endorsement by the applicable Ministry in accordance with the applicable legislation.

**Superintendent of Securities, Yukon**

**Per:** << "*Fred Pretorius*" >>

Fred Pretorius, Superintendent of Securities

**Date:** 24 Aug 2018

**Ontario Securities Commission**

<< "*Maureen Jensen*" >>

Maureen Jensen, Chair

**Date:** 10 Dec 2018

## Chapter 7

# Insider Reporting

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The following is a weekly summary of insider transactions by insiders of *Ontario reporting issuers* in SEDI ® (the System for Electronic Disclosure by Insiders).<sup>1</sup> The weekly summary contains insider transactions reported during the 7-day period ending Sunday at 11:59 p.m. (i.e. the Sunday prior to the Bulletin Issue date).<sup>2</sup>

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### Guide to Codes

#### Relationship of Insider to Issuer (Rel=n)

- |   |   |
|---|---|
| 1 | Issuer  |
| 2 | Subsidiary of Issuer  |
| 3 | 10% Security Holder of Issuer   |
| 4 | Director of Issuer  |
| 5 | Senior Officer of Issuer  |
| 6 | Director or Senior Officer of 10% Security Holder                                   |
| 7 | Director or Senior Officer of Insider or Subsidiary of Issuer (other than in 4,5,6) |
| 8 | Deemed Insider – 6 Months before becoming Insider                                   |

#### Nature of Transaction (T/O)

- |    |   |
|----|---|
| 00 | Opening Balance-Initial SEDI Report   |
| 10 | Acquisition or disposition in the public market                               |
| 11 | Acquisition or disposition carried out privately                              |
| 15 | Acquisition or disposition under a prospectus                                 |
| 16 | Acquisition or disposition under a prospectus exemption                       |
| 22 | Acquisition or disposition pursuant to a take-over bid, merger or acquisition |
| 30 | Acquisition or disposition under a purchase/ ownership plan                   |
| 35 | Stock dividend  |
| 36 | Conversion or exchange  |
| 37 | Stock split or consolidation  |
| 38 | Redemption, retraction, cancellation, repurchase                              |
| 40 | Short sale  |
| 45 | Compensation for property   |
| 46 | Compensation for services   |
| 47 | Acquisition or disposition by gift  |
| 48 | Acquisition by inheritance or disposition by bequest                          |
| 50 | Grant of options  |
| 51 | Exercise of options   |
| 52 | Expiration of options   |
| 53 | Grant of warrants   |
| 54 | Exercise of warrants  |
| 55 | Expiration of warrants  |
| 56 | Grant of rights   |
| 57 | Exercise of rights  |
| 59 | Exercise for cash   |
| 70 | Acquisition or disposition (writing) of third party derivative                |
| 71 | Exercise of third party derivative  |
| 72 | Other settlement of third party   |
| 73 | Expiration of third party derivative  |
| 90 | Change in nature of ownership   |
| 97 | Other   |
| 99 | Correction of Information   |

Note: The asterisk in the "Date/Month End Holding" column indicates the insider disagreed with the system calculated balance when the transaction was reported.

1 SEDI® is a registered trademark owned by CDS INC.

2 ©CDS INC.

**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/ Disposed
66 Resources Corp.	Common Shares	Dake, Michael R.	4, 5	1/24/2019	10	0.13	1,038,500	5,000
Abacus Health Products, Inc.	Options	Antelman, Perry	4, 5	1/29/2019	00		194,395	
Abacus Health Products, Inc.	Proportionate Shares	Voting Antelman, Perry	4, 5	1/29/2019	00		9,293	
Abacus Health Products, Inc.	Options	Hague III, Henry Russell	5	1/29/2019	00		64,798	
Abacus Health Products, Inc.	Subordinate Shares	Voting Hague III, Henry Russell	5	1/29/2019	00		100	
Abacus Health Products, Inc.	Options	Henderson, Phillip Charles	4	1/29/2019	00		97,917	
Abacus Health Products, Inc.	Proportionate Shares	Voting Henderson, Phillip Charles	4	1/29/2019	00		681	
Abacus Health Products, Inc.	Subordinate Shares	Voting Henderson, Phillip Charles	4	1/29/2019	00		100	
Abacus Health Products, Inc.	Options	Kaplan, Jesse Armin	4	7/18/2018	00			
Abacus Health Products, Inc.	Options	Kaplan, Jesse Armin	4	1/29/2019	11	3.09	32,399	32,399
Abacus Health Products, Inc.	Subordinate Shares	Voting Kaplan, Jesse Armin	4	7/18/2018	00			
Abacus Health Products, Inc.	Subordinate Shares	Voting Kaplan, Jesse Armin	4	1/29/2019	11		26,500	26,500
Abacus Health Products, Inc.	Options	Rosenthal, Eyal Shimon	4	1/29/2019	00		32,399	
Abattis Bioceuticals Corp.	Common Shares	Wilson, Cedric Paul	4	1/23/2019	10		0	-150,000
Abitibi Royalties Inc.	Common Shares	Ball, Ian	4, 5	2/1/2019	10	11.27	31,050	100
Advantage Oil & Gas Ltd.	Rights Deferred Share Units	Angevine, Jill Terilee	4	1/31/2019	56		44,327	2,541
Advantage Oil & Gas Ltd.	Rights Deferred Share Units	Balog, Stephen	4	1/31/2019	56		53,446	2,540
Advantage Oil & Gas Ltd.	Rights Deferred Share Units	Fagerheim, Grant Bradley	4	1/31/2019	56		55,030	1,270
Advantage Oil & Gas Ltd.	Rights Deferred Share Units	Haggis, Paul	4	1/31/2019	56		59,629	2,795
Advantage Oil & Gas Ltd.	Rights Deferred Share Units	McIntosh, Ronald A	4	1/31/2019	56		81,982	3,862
ADVANZ Corp. (formerly Concordia International Corp.)	PHARMA (formerly Concordia International Corp.)	MIP Exchangeable Shares	FORD, ROBERT DAVID	7	5/22/2017	00		
ADVANZ Corp. (formerly Concordia International Corp.)	PHARMA (formerly Concordia International Corp.)	MIP Exchangeable Shares	FORD, ROBERT DAVID	7	11/16/2018	56	2,373	2,373
ADVANZ Corp. (formerly Concordia International Corp.)	PHARMA (formerly Concordia International Corp.)	Limited Voting Shares	Solus Alternative Asset Management LP	3	1/25/2019	10	25.11	8,415,973
ADVANZ Corp. (formerly Concordia International Corp.)	PHARMA (formerly Concordia International Corp.)	Limited Voting Shares	Solus Alternative Asset Management LP	3	1/29/2019	10	24.7	8,415,673
ADVANZ Corp. (formerly Concordia International Corp.)	PHARMA (formerly Concordia International Corp.)	Limited Voting Shares	Solus Alternative Asset Management LP	3	1/30/2019	10	25	8,412,373
Adventus Corporation	Zinc	Common Shares	Murphy, Barry	4	1/23/2019	00		
Adventus Corporation	Zinc	Common Shares	Murphy, Barry	4	1/23/2019	00		
Adventus Corporation	Zinc	Options	Murphy, Barry	4	1/23/2019	00		
Adventus Corporation	Zinc	Options	Murphy, Barry	4	1/23/2019	00		
AF1 Capital Corp.	Common Shares	Dai, Meng Mike	3, 4	1/29/2019	00		600,000	

**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
AF1 Capital Corp.	Options	Dai, Meng Mike	3, 4	1/29/2019	00		150,000	
AF1 Capital Corp.	Common Shares	Galloro, Michael Bernardino	3, 4, 5	1/29/2019	00		1,200,000	
AF1 Capital Corp.	Options	Galloro, Michael Bernardino	3, 4, 5	1/29/2019	00		300,000	
AF1 Capital Corp.	Common Shares	Simeon, Peter Emmanouil	4	12/24/2018	00		200,000	
AF1 Capital Corp.	Options	Simeon, Peter Emmanouil	4	12/24/2018	00			
AF1 Capital Corp.	Options	Simeon, Peter Emmanouil	4	1/29/2019	50		50,000	50,000
AgraFlora Organics International Inc.	Common Shares	Hornung, Christopher Paul	4	1/25/2019	10	0.285	3,979,825	-128,000
AgraFlora Organics International Inc.	Common Shares	Hornung, Christopher Paul	4	1/25/2019	10	0.2884	3,857,825	-122,000
AgraFlora Organics International Inc.	Common Shares	Hornung, Christopher Paul	4	1/31/2019	51	0.168	4,107,825	250,000
AgraFlora Organics International Inc.	Options	Hornung, Christopher Paul	4	1/31/2019	51	0.168	500,000	-250,000
Aimia Inc.	Common Shares	Mittleman Investment Management, LLC	3	1/30/2019	97		27,973,047	-360,000
Akumin Inc.	Common Shares	Adams, AMy Michelle	5	11/24/2017	00			
Akumin Inc.	Common Shares	Adams, AMy Michelle	5	1/24/2019	30		42	42
Akumin Inc.	Common Shares	Fitzgerald, Chris	5	3/1/2018	00			
Akumin Inc.	Common Shares	Fitzgerald, Chris	5	1/24/2019	30		67	67
Akumin Inc.	Common Shares	Kassa, Laura Mae	5	11/24/2017	00			
Akumin Inc.	Common Shares	Kassa, Laura Mae	5	1/24/2019	30		196	196
Akumin Inc.	Common Shares	Luckey, Michael	5	11/24/2017	00			
Akumin Inc.	Common Shares	Luckey, Michael	5	1/24/2019	30		102	102
Akumin Inc.	Common Shares	Meredith, Michael	5	11/24/2017	00			
Akumin Inc.	Common Shares	Meredith, Michael	5	1/24/2019	30		107	107
Akumin Inc.	Common Shares	Moore, Karen	7	8/9/2017	00			
Akumin Inc.	Common Shares	Moore, Karen	7	1/24/2019	30		17	17
Akumin Inc.	Common Shares	Quesenberry, Marcus	5	11/24/2017	00			
Akumin Inc.	Common Shares	Quesenberry, Marcus	5	1/24/2019	30		153	153
Akumin Inc.	Common Shares	Richardson, Jason	5	11/24/2017	00			
Akumin Inc.	Common Shares	Richardson, Jason	5	1/24/2019	30		182	182
Alcanna Inc. (formerly Liquor Stores N.A. Ltd.)	Deferred Shares (Common Shares)	Booth, Terry	4	12/31/2018	56			10,198
Alcanna Inc. (formerly Liquor Stores N.A. Ltd.)	Deferred Shares (Common Shares)	Booth, Terry	4	12/31/2018	30		10,198	10,198
Alexco Resource Corp.	Common Shares	Clark, Michael	5	1/29/2019	57	1.34	75,048	10,000
Alexco Resource Corp.	Common Shares	Clark, Michael	5	1/30/2019	10	1.32	69,481	-5,567
Alexco Resource Corp.	Restricted Share Units	Clark, Michael	5	1/29/2019	57	1.27		-10,000
Alexco Resource Corp.	Restricted Share Units	Clark, Michael	5	1/29/2019	57	1.34	83,332	-10,000
Alexco Resource Corp.	Common Shares	Krepiakevich, Terry	5	1/29/2019	57	1.34	149,374	6,667
Alexco Resource Corp.	Common Shares	Krepiakevich, Terry	5	1/30/2019	10	1.32	145,171	-4,203
Alexco Resource Corp.	Restricted Share Units	Krepiakevich, Terry	5	1/29/2019	57	1.34	59,999	-6,667
Alexco Resource Corp.	Common Shares	Sanders, Elaine	4	1/29/2019	57	1.34	101,116	6,667
Alexco Resource Corp.	Common Shares	Sanders, Elaine	4	1/29/2019	10	1.32	97,404	-3,712
Alexco Resource Corp.	Restricted Share Units	Sanders, Elaine	4	1/29/2019	57	1.34	33,333	-6,667
Alexco Resource Corp.	Common Shares	Van Nieuwenhuysse, Rick	4	1/29/2019	57	1.34	85,274	6,667
Alexco Resource Corp.	Common Shares	Van Nieuwenhuysse, Rick	4	1/29/2019	10	1.32	81,562	-3,712
Alexco Resource Corp.	Restricted Share Units	Van Nieuwenhuysse, Rick	4	1/29/2019	57	1.34	59,999	-6,667
Alexco Resource Corp.	Common Shares	Winn, Michael D.	4	1/29/2019	57	1.34	155,001	6,667
Alexco Resource Corp.	Restricted Share Units	Winn, Michael D.	4	1/29/2019	57	1.34	59,999	-6,667
Alexco Resource Corp.	Common Shares	Zimmer, Richard Norman	4	1/29/2019	57	1.34	139,755	6,667

**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Alexco Resource Corp.	Common Shares	Zimmer, Richard Norman	4	1/30/2019	10	1.32	136,392	-3,363
Alexco Resource Corp.	Restricted Share Units	Zimmer, Richard Norman	4	1/29/2019	57	1.34	59,999	-6,667
Algoma Central Corporation	Common Shares	Stevenson, Eric Arthur	7	12/31/2018	30	14.35	2,629	403
Alianza Minerals Ltd. (formerly Tarsis Resources Ltd.)	Common Shares	Brown, Mark Thomas	4	1/25/2019	10	0.075	395,000	5,000
Alianza Minerals Ltd. (formerly Tarsis Resources Ltd.)	Common Shares	Brown, Mark Thomas	4	1/25/2019	10	0.075	9,722,515	10,000
Alimentation Tard Inc.	Couche-Subordinate Voting Shares Catégorie B	Cunnington, Kathy	5	12/31/2018	30	60.33	3,418	189
Alimentation Tard Inc.	Couche-Subordinate Voting Shares Catégorie B	Davis, Darrell J.	7	12/31/2018	30	60.43		415
Alimentation Tard Inc.	Couche-Subordinate Voting Shares Catégorie B	Davis, Darrell J.	7	12/31/2018	30	60.43	7,293	416
Alimentation Tard Inc.	Couche-Subordinate Voting Shares Catégorie B	Descheneaux, Mathieu	5	12/31/2018	30	61.04	431	39
Alimentation Tard Inc.	Couche-Subordinate Voting Shares Catégorie B	Hannasch, Brian Patrick	4, 5	12/31/2018	30	60.37	6,255	331
Alimentation Tard Inc.	Couche-Subordinate Voting Shares Catégorie B	Madsen, Jørn	7	12/31/2018	30	60.95	1,008	427
Alimentation Tard Inc.	Couche-Subordinate Voting Shares Catégorie B	Miller, Alex	5	12/31/2018	30	60.78	2,233	409
Alimentation Tard Inc.	Couche-Subordinate Voting Shares Catégorie B	Strand, Ina	7	12/31/2018	30	60.5	181	137
Alimentation Tard Inc.	Couche-Subordinate Voting Shares Catégorie B	Strand, Ina	7	12/31/2018	30	60.82	299	118
Alimentation Tard Inc.	Couche-Subordinate Voting Shares Catégorie B	Tewell, Dennis	5	12/31/2017	30	60.49		7
Alimentation Tard Inc.	Couche-Subordinate Voting Shares Catégorie B	Tewell, Dennis	5	12/31/2017	30	60.49	1,668	303
Alimentation Tard Inc.	Couche-Subordinate Voting Shares Catégorie B	Tewell, Dennis	5	12/31/2018	30	60.82	1,675	7
Alimentation Tard Inc.	Couche-Subordinate Voting Shares Catégorie B	Tewell, Dennis	5	12/31/2018	30	60.76	1,943	268
Alimentation Tard Inc.	Couche-Subordinate Voting Shares Catégorie B	Trudel, Stéphane	5	12/31/2018	30	60.73	371	274
AltaGas Ltd.	Common Shares	Wright, David Robert	7	1/1/2019	00			
AltaGas Ltd.	Common Shares	Wright, David Robert	7	1/1/2019	00		47,438	
AltaGas Ltd.	Common Shares	Wright, David Robert	7	1/1/2019	00		2,332	
AltaGas Ltd.	Common Shares	Wright, David Robert	7	1/1/2019	00		1,662	
Alternate Health Corp.	Common Shares	Chidgey, Robert	5	1/22/2019	00		550	
Alternate Health Corp.	Common Shares	Chidgey, Robert	5	1/22/2019	10	1.2	1,100	550
Alternate Health Corp.	Common Shares	Chidgey, Robert	5	1/30/2019	99	1.2	550	-550
Alternate Health Corp.	Common Shares	Kemper, Kyle	4	1/22/2019	00			
American Creek Resources Ltd.	Options	Blaney, Darren	3, 4, 5	1/21/2019	50	0.05	11,295,000	2,200,000
American Creek Resources Ltd.	Options	Edwards, Dennis Gibb	4	1/21/2019	50	0.05	400,000	50,000
American Creek Resources Ltd.	Options	Edwards, Robert Nathan	5	1/21/2019	50	0.05	7,285,000	1,000,000
American Creek Resources Ltd.	Options	Pownall, Sean Patrick	4	1/21/2019	50	0.05	950,000	250,000
American Hotel Income Properties REIT LP	Restricted Stock	McAuley, Ian	5	2/1/2019	57		52,290	-10,180
American Hotel Income Properties REIT LP	Restricted Stock	McAuley, Ian	5	2/1/2019	58 - Expiration of rights		0	-52,290
American Hotel Income Properties REIT LP	Units	McAuley, Ian	5	2/1/2019	57		119,646	6,580
American Hotel Income Properties REIT LP	Units	McAuley, Ian	5	2/1/2019	57		30,552	3,600



**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/ Disposed
American Hotel Income Properties REIT LP	Units	O'Neill, John Christopher	5	1/29/2019	30	7.14	392,440	3,058
Aphria Inc. (formerly, Black Sparrow Capital Corp.)	Common Shares	Leong, Gary Joseph	5	1/28/2019	54	20000	180,129	20,000
Aphria Inc. (formerly, Black Sparrow Capital Corp.)	Warrants	Leong, Gary Joseph	5	1/28/2019	54	1.5	0	-20,000
Aquarius Surgical Technologies Inc. (formerly Aquarius Coatings Inc.)	Common Shares	Hennigar, David John	4, 6, 5	1/31/2019	10	0.3	138,500	21,000
Arctic Star Exploration Corp.	Common Shares	Power, Patrick Edward	4, 5	1/28/2019	10	0.035		100,000
Arctic Star Exploration Corp.	Common Shares	Power, Patrick Edward	4, 5	1/28/2019	10	0.035		100,000
AREV Brands International Ltd. (Formerly, AREV Nutrition Sciences Inc)	Common Shares	Withrow, Mike Withrow	4	2/1/2019	10	0.29	13,247,500	16,000
AREV Brands International Ltd. (Formerly, AREV Nutrition Sciences Inc)	Common Shares	Withrow, Mike Withrow	4	2/1/2019	11	0.1		2,000,000
AREV Brands International Ltd. (Formerly, AREV Nutrition Sciences Inc)	Common Shares	Withrow, Mike Withrow	4	2/1/2019	11	0.1	11,247,500	-2,000,000
ARHT Media Inc. (formerly known as Vast Exploration Inc.)	Options	Wetherald, David	4	11/28/2018	00			
ARHT Media Inc. (formerly known as Vast Exploration Inc.)	Options	Wetherald, David	4	1/31/2019	50	0.14	65,000	65,000
Artis Real Estate Investment Trust	Preferred Series A	Shares	Artis Real Estate Investment Trust	1	1/24/2019	38	-2,000	-7,200
Artis Real Estate Investment Trust	Preferred Series E	Shares	Artis Real Estate Investment Trust	1	1/24/2019	38	-1,200	-7,500
Artis Real Estate Investment Trust	Preferred Series G	Shares	Artis Real Estate Investment Trust	1	1/24/2019	38	-1,000	-6,600
Artis Real Estate Investment Trust	Units	Artis Real Estate Investment Trust	1	1/31/2019	38		-170,376	-1,842,588
Artis Real Estate Investment Trust	Units	Johnson, David Lyall	5	12/14/2018	30	12.523	4,057	299
Artis Real Estate Investment Trust	Units	Johnson, David Lyall	5	1/15/2019	30	9.9991	4,073	16
Artis Real Estate Investment Trust	Units	Johnson, David Lyall	5	1/24/2019	10	10.1	4,413	340
Artis Real Estate Investment Trust	Units	Johnson, David Lyall	5	12/14/2018	30	12.531	559	37
Artis Real Estate Investment Trust	Units	Johnson, David Lyall	5	1/15/2019	10	9.9991		2
Artis Real Estate Investment Trust	Units	Johnson, David Lyall	5	1/15/2019	30	9.9991	561	2
Asian Television Network International Limited	Common Shares	CHANDRASEKAR, SUBRAHMAN	4, 5	1/30/2019	10	0.14	16,605,018	100,000
Athabasca Corporation	Oil	Options	Broen, Robert Anthony	5	10/31/2018	52	4,323,100	-80,500
Aura Minerals Inc.	Common Shares	Barbosa, Rodrigo Cardoso	5	12/31/2018	37		2,080	-18,720
Aura Minerals Inc.	Options	Barbosa, Rodrigo Cardoso	5	12/31/2018	37		86,745	-780,705
Aura Minerals Inc.	Options	Castanho, Sergio	5	12/31/2018	37		43,373	-390,352
Aura Minerals Inc.	Common Shares	Cornejo Rojas, Fernando Alonso	5	6/1/2015	00			
Aura Minerals Inc.	Common Shares	Cornejo Rojas, Fernando Alonso	5	1/22/2019	51	15	225	225

**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Aura Minerals Inc.	Common Shares	Cornejo Rojas, Fernando Alonso	5	1/22/2019	51	10	2,109	1,884
Aura Minerals Inc.	Common Shares	Cornejo Rojas, Fernando Alonso	5	1/22/2019	51	8.5	3,174	1,065
Aura Minerals Inc.	Options	Cornejo Rojas, Fernando Alonso	5	12/31/2018	37		124,060	-9,000
Aura Minerals Inc.	Options	Cornejo Rojas, Fernando Alonso	5	12/31/2018	37		106,960	-17,100
Aura Minerals Inc.	Options	Cornejo Rojas, Fernando Alonso	5	12/31/2018	37		88,960	-18,000
Aura Minerals Inc.	Options	Cornejo Rojas, Fernando Alonso	5	12/31/2018	37		71,860	-17,100
Aura Minerals Inc.	Options	Cornejo Rojas, Fernando Alonso	5	12/31/2018	37		13,306	-58,554
Aura Minerals Inc.	Options	Cornejo Rojas, Fernando Alonso	5	1/22/2019	51	15	12,306	-1,000
Aura Minerals Inc.	Options	Cornejo Rojas, Fernando Alonso	5	1/22/2019	51	10	10,406	-1,900
Aura Minerals Inc.	Options	Cornejo Rojas, Fernando Alonso	5	1/22/2019	51	10	8,406	-2,000
Aura Minerals Inc.	Options	Cornejo Rojas, Fernando Alonso	5	1/22/2019	51	8.5	6,506	-1,900
Aura Minerals Inc.	Common Shares	Goodman, Ryan	5	12/30/2016	37		5,625	-50,625
Aura Minerals Inc.	Common Shares	Goodman, Ryan	5	1/5/2017	37			-50,625
Aura Minerals Inc.	Common Shares	Goodman, Ryan	5	12/31/2018	37		562	-5,063
Aura Minerals Inc.	Common Shares	Goodman, Ryan	5	1/28/2019	51	12	1,208	646
Aura Minerals Inc.	Common Shares	Goodman, Ryan	5	1/28/2019	51	10	2,174	966
Aura Minerals Inc.	Common Shares	Goodman, Ryan	5	1/28/2019	51	10	3,140	966
Aura Minerals Inc.	Common Shares	Goodman, Ryan	5	1/28/2019	51	8.5	4,261	1,121
Aura Minerals Inc.	Options	Goodman, Ryan	5	6/29/2012	50		150,000	150,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	1/2/2013	50			170,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	1/2/2013	50		320,000	170,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	1/22/2014	37			17,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	1/22/2014	37			17,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	1/22/2014	37		303,000	-17,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	7/13/2015	37			40,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	7/13/2015	37		263,000	-40,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	2/5/2016	37			20,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	2/5/2016	37		243,000	-20,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	12/31/2018	37		239,070	-15,300
Aura Minerals Inc.	Options	Goodman, Ryan	5	12/31/2018	37		221,070	-18,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	12/31/2018	37		203,070	-18,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	12/31/2018	37		185,070	-18,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	12/31/2018	37		146,037	-39,033
Aura Minerals Inc.	Options	Goodman, Ryan	5	1/22/2019	51		144,337	-1,700
Aura Minerals Inc.	Options	Goodman, Ryan	5	1/22/2019	51		142,337	-2,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	1/22/2019	51		140,337	-2,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	1/22/2019	51		138,337	-2,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	6/29/2012	50			150,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	1/2/2013	50			170,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	1/22/2014	50			170,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	1/22/2014	37			17,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	7/13/2015	50	0.1		400,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	7/13/2015	37			40,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	2/5/2016	50			200,000
Aura Minerals Inc.	Options	Goodman, Ryan	5	2/5/2016	37			20,000
Aura Minerals Inc.	Common Shares	Keith, Stephen	4	12/31/2018	37		1,000	-9,000
Aura Minerals Inc.	Common Shares	Keith, Stephen	4	2/1/2019	51	12	3,000	2,000
Aura Minerals Inc.	Common Shares	Keith, Stephen	4	2/1/2019	51	10	3,045	45
Aura Minerals Inc.	Options	Keith, Stephen	4	8/22/2011	50	1.87	260,000	260,000

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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Aura Minerals Inc.	Options	Keith, Stephen	4	1/6/2012	50	1.47	360,000	100,000
Aura Minerals Inc.	Options	Keith, Stephen	4	1/2/2013	50	0.3	560,000	200,000
Aura Minerals Inc.	Options	Keith, Stephen	4	1/22/2014	50	0.12	760,000	200,000
Aura Minerals Inc.	Options	Keith, Stephen	4	7/13/2015	50	0.1	985,000	225,000
Aura Minerals Inc.	Options	Keith, Stephen	4	2/5/2016	50		1,085,000	400,000
Aura Minerals Inc.	Options	Keith, Stephen	4	8/22/2016	52	1.87	825,000	-260,000
Aura Minerals Inc.	Options	Keith, Stephen	4	11/30/2016	37			-180,000
Aura Minerals Inc.	Options	Keith, Stephen	4	12/30/2016	37		645,000	-180,000
Aura Minerals Inc.	Options	Keith, Stephen	4	1/22/2018	52			-200,000
Aura Minerals Inc.	Options	Keith, Stephen	4	1/22/2018	52			-200,000
Aura Minerals Inc.	Options	Keith, Stephen	4	12/31/2018	37		64,500	-18,000
Aura Minerals Inc.	Options	Keith, Stephen	4	12/31/2018	37		44,250	-20,250
Aura Minerals Inc.	Options	Keith, Stephen	4	12/31/2018	37		8,250	-36,000
Aura Minerals Inc.	Options	Keith, Stephen	4	1/22/2019	51		6,250	-2,000
Aura Minerals Inc.	Options	Keith, Stephen	4	1/22/2019	51		4,000	-2,250
Aura Minerals Inc.	Options	Keith, Stephen	4	1/22/2019	51		0	-4,000
Aura Minerals Inc.	Options	Keith, Stephen	4	8/22/2011	50	1.87		260,000
Aura Minerals Inc.	Options	Keith, Stephen	4	1/6/2012	50	1.47		100,000
Aura Minerals Inc.	Options	Keith, Stephen	4	1/2/2013	50	0.3		200,000
Aura Minerals Inc.	Options	Keith, Stephen	4	1/2/2013	50	0.3		200,000
Aura Minerals Inc.	Options	Keith, Stephen	4	1/22/2014	50	0.12		200,000
Aura Minerals Inc.	Options	Keith, Stephen	4	7/13/2015	50	0.1		225,000
Aura Minerals Inc.	Options	Keith, Stephen	4	2/5/2016	50			400,000
Aura Minerals Inc.	Options	Keith, Stephen	4	8/22/2016	52	1.87		-260,000
Aurelius Minerals Inc. (formerly Galena International Resources Ltd.)	Common Shares	MacGillivray, Lorna	5	1/23/2019	00		500,000	
Aurelius Minerals Inc. (formerly Galena International Resources Ltd.)	Common Shares	MacGillivray, Lorna	5	1/23/2019	00			
Aurelius Minerals Inc. (formerly Galena International Resources Ltd.)	Options	MacGillivray, Lorna	5	1/23/2019	00			
Aurelius Minerals Inc. (formerly Galena International Resources Ltd.)	Options	MacGillivray, Lorna	5	1/23/2019	50	0.06	225,000	225,000
Aurelius Minerals Inc. (formerly Galena International Resources Ltd.)	Warrants	MacGillivray, Lorna	5	1/23/2019	00		500,000	
Aurelius Minerals Inc. (formerly Galena International Resources Ltd.)	Warrants	MacGillivray, Lorna	5	1/23/2019	00			
Aurelius Minerals Inc. (formerly Galena International Resources Ltd.)	Options	Turner, Randy	3, 4, 5	1/23/2019	50		1,223,400	400,000
Aurinia Pharmaceuticals Inc.	Options	Bourgeault, Dennis	5	1/29/2019	50	8.04	665,776	70,000
Aurinia Pharmaceuticals Inc.	Options	Dickerson, Bradley	5	1/29/2019	50	8.04	448,601	70,000
Aurinia Pharmaceuticals Inc.	Options	Eglite, Erik	5	1/29/2019	50	8.04	517,500	87,500
Aurinia Pharmaceuticals Inc.	Common Shares	Glickman, Richard	4	1/29/2019	10	8.1	1,021,206	3,700
Aurinia Pharmaceuticals Inc.	Common Shares	Glickman, Richard	4	1/29/2019	10	8.1	110,689	1,200
Aurinia Pharmaceuticals Inc.	Common Shares	Glickman, Richard	4	1/29/2019	10	8.1	113,789	3,100

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Aurinia Pharmaceuticals Inc.	Options	Gluck, Rashieda	5	1/29/2019	50	8.04	295,695	87,500
Aurinia Pharmaceuticals Inc.	Options	Hagan, Joseph Patrick	4	1/29/2019	50	8.04	80,000	30,000
Aurinia Pharmaceuticals Inc.	Options	Hayden, Michael Reuben	4	1/29/2019	50	8.04	80,000	30,000
Aurinia Pharmaceuticals Inc.	Options	Huizinga, Robert	5	1/29/2019	50	8.04	592,537	70,000
Aurinia Pharmaceuticals Inc.	Options	Jayne, David Roland Walker	4	1/29/2019	50	8.04	120,000	30,000
Aurinia Pharmaceuticals Inc.	Options	Lee, Hyuek Joon	4	1/29/2019	50	8.04	120,000	30,000
Aurinia Pharmaceuticals Inc.	Options	Martin, Michael Robert	4, 5	2/1/2019	50	8.04	497,439	70,000
Aurinia Pharmaceuticals Inc.	Options	Milne, George M	4	1/29/2019	50	8.04	110,000	30,000
Aurinia Pharmaceuticals Inc.	Options	Rovinski, Benjamin	4	1/29/2019	50	8.04	130,000	30,000
Aurinia Pharmaceuticals Inc.	Common Shares	Solomons, Neil	5	1/28/2019	10	8.073	394,099	-8,000
Aurinia Pharmaceuticals Inc.	Common Shares	Solomons, Neil	5	1/29/2019	10	8.3	392,099	-2,000
Aurinia Pharmaceuticals Inc.	Options	Solomons, Neil	5	1/29/2019	50	8.04	584,439	70,000
Auryn Resources Inc.	Common Shares	Cook, Steven Mark	4	1/28/2019	51		90,000	70,000
Auryn Resources Inc.	Options	Cook, Steven Mark	4	1/28/2019	51		100,000	-70,000
Auxly Cannabis Group Inc.	Common Shares	Cartwright, Robert Hugh	3	1/29/2019	10	1.11	380,115	-1,200
Auxly Cannabis Group Inc.	Common Shares	Cartwright, Robert Hugh	3	1/29/2019	10	1.2	378,115	-2,000
Avcorp Industries Inc.	Common Shares	Panta Holdings B.V.	3	9/18/2018	54	0.07	262,006,481	30,714,118
Avcorp Industries Inc.	Warrants	Panta Holdings B.V.	3	9/18/2018	54		0	-30,714,118
Azarga Uranium Corp.	Common Shares	MAYS, JOHN	5	1/28/2019	10	0.24	72,000	-3,000
Azarga Uranium Corp.	Common Shares	MAYS, JOHN	5	1/29/2019	10	0.24	53,500	-18,500
Badger Daylighting Ltd.	Common Shares	Badger Daylighting Ltd.	1	1/31/2019	38	34.985	34,923	34,923
Badger Daylighting Ltd.	Common Shares	Badger Daylighting Ltd.	1	2/1/2019	38	34.925	69,846	34,923
Badger Daylighting Ltd.	Performance Share Unit	Tunney, Michael James	5	12/31/2018	56			6,162
Badger Daylighting Ltd.	Performance Share Unit	Tunney, Michael James	5	12/31/2018	56		12,536	5,177
Bank of Nova Scotia, The	Rights Performance Share Units (PSU)	Arellano, Ian	5	12/31/2018	30		48,423	1,180
Bank of Nova Scotia, The	Rights Director Deferred Stock Units (DDSU)	Aufreiter, Nora Anne	4	1/29/2019	56	74.32	9,297	757
Bank of Nova Scotia, The	Rights Director Deferred Stock Units (DDSU)	Aufreiter, Nora Anne	4	1/29/2019	30	74.32	9,394	97
Bank of Nova Scotia, The	Rights Director Deferred Stock Units (DDSU)	Babatz, Guillermo	4	1/29/2019	56	74.32	10,128	488
Bank of Nova Scotia, The	Rights Director Deferred Stock Units (DDSU)	Babatz, Guillermo	4	1/29/2019	30	74.32	10,238	110
Bank of Nova Scotia, The	Rights Director Deferred Stock Units (DDSU)	Bonham, Scott Barclay	4	1/29/2019	56	74.32	9,694	790
Bank of Nova Scotia, The	Rights Director Deferred Stock Units (DDSU)	Bonham, Scott Barclay	4	1/29/2019	30	74.32	9,796	102
Bank of Nova Scotia, The	Common Shares	Branion, Andrew	5	12/31/2018	30		56	3
Bank of Nova Scotia, The	Rights Performance Share Units (PSU)	Branion, Andrew	5	12/31/2018	30		30,037	1,398

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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Bank of Nova Scotia, The	Rights Director Deferred Stock Units (DDSU)	Dallara, Charles Harry	4	1/29/2019	56	74.32	10,354	487
Bank of Nova Scotia, The	Rights Director Deferred Stock Units (DDSU)	Dallara, Charles Harry	4	1/29/2019	30	74.32	10,467	113
Bank of Nova Scotia, The	Rights Performance Share Units (PSU)	Deschamps, Ignacio	5	12/31/2018	30		117,409	5,040
Bank of Nova Scotia, The	Common Shares	Lawrence, Jason	5	12/31/2018	30		2,400	10
Bank of Nova Scotia, The	Rights Director Deferred Stock Units (DDSU)	Macklem, Richard Tiffany	4	1/29/2019	56	74.32	12,727	925
Bank of Nova Scotia, The	Rights Director Deferred Stock Units (DDSU)	Macklem, Richard Tiffany	4	1/29/2019	30	74.32	12,862	135
Bank of Nova Scotia, The	Common Shares	Mason, Barbara Frances	5	12/31/2018	30		2,366	213
Bank of Nova Scotia, The	Rights Performance Share Units (PSU)	Mason, Barbara Frances	5	12/31/2018	30		53,931	2,458
Bank of Nova Scotia, The	Common Shares	Moore, Daniel	5	12/31/2018	30		12,423	76
Bank of Nova Scotia, The	Rights Performance Share Units (PSU)	Moore, Daniel	5	12/31/2018	30		43,868	1,764
Bank of Nova Scotia, The	Common Shares	Neate, James	5	12/31/2018	30		6,353	10
Bank of Nova Scotia, The	Rights Director Deferred Stock Units (DDSU)	O'Neill, Thomas Charles	4	1/29/2019	56	74.32	57,590	1,513
Bank of Nova Scotia, The	Rights Director Deferred Stock Units (DDSU)	O'Neill, Thomas Charles	4	1/29/2019	30	74.32	58,231	641
Bank of Nova Scotia, The	Common Shares	O'Sullivan, James Patrick	5	12/31/2018	30		59,456	2,637
Bank of Nova Scotia, The	Rights Performance Share Units (PSU)	O'Sullivan, James Patrick	5	12/31/2018	30		84,480	3,277
Bank of Nova Scotia, The	Rights Director Deferred Stock Units (DDSU)	Pacheco, Eduardo	4	1/29/2019	56	74.32	11,056	791
Bank of Nova Scotia, The	Rights Director Deferred Stock Units (DDSU)	Pacheco, Eduardo	4	1/29/2019	30	74.32	11,173	117
Bank of Nova Scotia, The	Rights Director Deferred Stock Units (DDSU)	Penner, Michael D.	5	1/29/2019	56	74.32	4,971	790
Bank of Nova Scotia, The	Rights Director Deferred Stock Units (DDSU)	Penner, Michael D.	5	1/29/2019	30	74.32	5,019	48
Bank of Nova Scotia, The	Common Shares	Porter, Brian J	4, 5	12/31/2018	30		119,925	233
Bank of Nova Scotia, The	Rights Deferred Stock Units (DSU)	Porter, Brian J	4, 5	12/31/2018	30		17,494	733
Bank of Nova Scotia, The	Rights Performance Share Units (PSU)	Porter, Brian J	4, 5	12/31/2018	30		241,554	10,660
Bank of Nova Scotia, The	Rights Director Deferred Stock Units (DDSU)	Power, Una Marie	4	1/29/2019	56	74.32	9,760	958
Bank of Nova Scotia, The	Rights Director Deferred Stock Units (DDSU)	Power, Una Marie	4	1/29/2019	30	74.32	9,860	100
Bank of Nova Scotia, The	Common Shares	Rees, Daniel Llewellyn	5	12/31/2018	30		11,668	695
Bank of Nova Scotia, The	Rights Performance Share Units (PSU)	Rees, Daniel Llewellyn	5	12/31/2018	30		29,780	941
Bank of Nova Scotia, The	Rights Director Deferred Stock Units (DDSU)	Regent, Aaron William	4	1/29/2019	56	74.32	22,126	925

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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/ Disposed
Bank of Nova Scotia, The	Rights Deferred Stock Units (DDSU)	Director Regent, Aaron William	4	1/29/2019	30	74.32	22,368	242
Bank of Nova Scotia, The	Rights Deferred Stock Units (DDSU)	Director Samarasekera, Indira Vasanti	4	1/29/2019	56	74.32	36,486	488
Bank of Nova Scotia, The	Rights Deferred Stock Units (DDSU)	Director Samarasekera, Indira Vasanti	4	1/29/2019	30	74.32	36,897	411
Bank of Nova Scotia, The	Rights Deferred Stock Units (DDSU)	Director Segal, Susan Louise	4	1/29/2019	56	74.32	26,503	908
Bank of Nova Scotia, The	Rights Deferred Stock Units (DDSU)	Director Segal, Susan Louise	4	1/29/2019	30	74.32	26,796	293
Bank of Nova Scotia, The	Rights Deferred Stock Units (DDSU)	Director Thomas, Barbara Susan	4	1/29/2019	56	74.32	29,444	790
Bank of Nova Scotia, The	Rights Deferred Stock Units (DDSU)	Director Thomas, Barbara Susan	4	1/29/2019	30	74.32	29,772	328
Bank of Nova Scotia, The	Rights Deferred Stock Units (DDSU)	Director Thomson, Scott	4	1/29/2019	56	74.32	8,912	790
Bank of Nova Scotia, The	Rights Deferred Stock Units (DDSU)	Director Thomson, Scott	4	1/29/2019	30	74.32	9,005	93
Bank of Nova Scotia, The	Common Shares	Viswanathan, Rajagopal	5	12/31/2018	30		14,302	98
Bank of Nova Scotia, The	Rights Performance Share Units (PSU)	Viswanathan, Rajagopal	5	12/31/2018	30		11,960	235
Bank of Nova Scotia, The	Rights Deferred Stock Units (DDSU)	Director Warmbold, Benita Marie	4	1/29/2019	56	74.32	783	757
Bank of Nova Scotia, The	Common Shares	Zerbs, Michael	5	12/31/2018	30		392	131
Bank of Nova Scotia, The	Rights Deferred Stock Units (DSU)	Zerbs, Michael	5	12/31/2018	30		21,304	672
Bank of Nova Scotia, The	Rights Performance Share Units (PSU)	Zerbs, Michael	5	12/31/2018	30		38,553	1,328
Banyan Gold Corp.	Options	Christie, Tara	4	1/31/2019	52		2,300,000	-100,000
Banyan Gold Corp.	Options	Rutt, David	3, 4, 5	1/31/2019	52		403,350	-100,000
Barker Minerals Ltd.	Common Shares	Kristian, Jerry Archie	3, 4	2/1/2019	10	0.01	25,421,621	-20,000
Barkerville Gold Mines Ltd.	Options	Burzynski, John Feliks	4, 6	1/31/2019	50		150,000	75,000
Barkerville Gold Mines Ltd.	Options	Kutkevicius, John Joseph	4	1/31/2019	50		1,850,000	75,000
Barkerville Gold Mines Ltd.	Options	Lodder, Chris Andrea	4	1/31/2019	50		2,850,000	75,000
Barkerville Gold Mines Ltd.	Rights Restricted Share Units	Lodder, Chris Andrea	4	1/31/2019	56		1,350,000	600,000
Barkerville Gold Mines Ltd.	Options	Makuch, Anthony Paul	4	1/31/2019	50		2,025,000	75,000
Barkerville Gold Mines Ltd.	Options	OBRADOVICH, THOMAS JOHN	4	1/31/2019	50		2,275,000	100,000
Barkerville Gold Mines Ltd.	Options	Prychidny, Morris	4	1/31/2019	50		1,450,000	100,000
Barkerville Gold Mines Ltd.	Options	St-Germain, Andree	4	1/31/2019	50		650,000	75,000
Barkerville Gold Mines Ltd.	Rights Restricted Share Units	Tinajero, Andres	5	1/31/2019	56		700,000	450,000
Bayhorse Silver Inc.	Common Shares	O'Neill, Graeme	5	1/29/2019	36	0.125	3,338,478	1,602,120
Bayhorse Silver Inc.	Common Shares	O'Neill, Graeme	5	1/29/2019	36	0.125	3,605,498	267,020
Bayhorse Silver Inc.	Common Shares	O'Neill, Graeme	5	1/29/2019	36	0.125	6,542,718	2,937,220
Bayhorse Silver Inc.	Convertible Debentures	O'Neill, Graeme	5	12/19/2018	16	5000		\$55

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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Bayhorse Silver Inc.	Convertible Debentures	O'Neill, Graeme	5	12/19/2018	16	6469		\$355,795
Bayhorse Silver Inc.	Convertible Debentures C\$0.125	@ O'Neill, Graeme	5	8/22/2018	16	6518		\$195,540
Bayhorse Silver Inc.	Convertible Debentures C\$0.125	@ O'Neill, Graeme	5	8/22/2018	16	6518	\$200,265	\$200,265
Bayhorse Silver Inc.	Convertible Debentures C\$0.125	@ O'Neill, Graeme	5	9/27/2018	16	6522		\$32,612
Bayhorse Silver Inc.	Convertible Debentures C\$0.125	@ O'Neill, Graeme	5	9/27/2018	16	6522	\$234,022	\$33,757
Bayhorse Silver Inc.	Convertible Debentures C\$0.125	@ O'Neill, Graeme	5	12/19/2018	16	6469		\$355,795
Bayhorse Silver Inc.	Convertible Debentures C\$0.125	@ O'Neill, Graeme	5	12/19/2018	16	6469	\$601,174	\$367,152
Bayhorse Silver Inc.	Convertible Debentures C\$0.125	@ O'Neill, Graeme	5	1/29/2019	36	0.125	\$400,909	(\$200,265)
Bayhorse Silver Inc.	Convertible Debentures C\$0.125	@ O'Neill, Graeme	5	1/29/2019	36	0.125	\$367,152	(\$33,757)
Bayhorse Silver Inc.	Convertible Debentures C\$0.125	@ O'Neill, Graeme	5	1/29/2019	36	0.125	\$0	(\$367,152)
Baytex Energy Corp.	Common Shares	LaFehr, Edward David	5	1/28/2019	10	2.18	464,444	5,000
BCE Inc.	Common Shares	Denison, David Francis	4	1/15/2018	35	58.54	1,071	12
BCE Inc.	Common Shares	Denison, David Francis	4	4/16/2018	35	54.63	1,085	14
BCE Inc.	Common Shares	Denison, David Francis	4	7/16/2018	35	55.89	1,099	14
BCE Inc.	Common Shares	Denison, David Francis	4	10/15/2018	35	51.44	1,115	16
BCE Inc.	Common Shares	Rovinescu, Calin	4	1/15/2018	35	58.11	136	1
BCE Inc.	Common Shares	Rovinescu, Calin	4	4/15/2018	35	53.83	137	1
BCE Inc.	Common Shares	Rovinescu, Calin	4	7/15/2018	35	56.03	138	1
BCE Inc.	Common Shares	Rovinescu, Calin	4	10/15/2018	35	51.59	139	1
BCE Inc.	Common Shares	Rovinescu, Calin	4	1/15/2018	35	58.11	19,931	227
BCE Inc.	Common Shares	Rovinescu, Calin	4	4/15/2018	35	53.83	20,193	262
BCE Inc.	Common Shares	Rovinescu, Calin	4	7/15/2018	35	56.03	20,448	255
BCE Inc.	Common Shares	Rovinescu, Calin	4	10/15/2018	35	51.59	20,729	281
BCE Inc.	Common Shares	Rovinescu, Calin	4	4/15/2018	35	53.83	135	1
BCE Inc.	Common Shares	Rovinescu, Calin	4	7/15/2018	35	56.03	136	1
BCE Inc.	Common Shares	Rovinescu, Calin	4	10/15/2018	35	51.59	137	1
Bear Creek Mining Corporation	Options	Hawkshaw, Anthony Grant	4, 5	2/1/2019	50		1,150,000	150,000
Beleave Inc. (formerly Stream Ventures Inc.)	Options	Heselton, Mark	4	3/1/2018	00			
Beleave Inc. (formerly Stream Ventures Inc.)	Options	Heselton, Mark	4	3/1/2018	50		100,000	100,000
Beleave Inc. (formerly Stream Ventures Inc.)	Options	Heselton, Mark	4	3/1/2018	37			600,000
Beleave Inc. (formerly Stream Ventures Inc.)	Options	Heselton, Mark	4	3/1/2018	37			600,000
Beleave Inc. (formerly Stream Ventures Inc.)	Options	Heselton, Mark	4	11/5/2018	37		700,000	600,000
Beleave Inc. (formerly Stream Ventures Inc.)	Options	Miles, Mark	4	3/1/2018	00			
Beleave Inc. (formerly Stream Ventures Inc.)	Options	Miles, Mark	4	3/1/2018	50		100,000	100,000
Beleave Inc. (formerly Stream Ventures Inc.)	Options	Miles, Mark	4	11/5/2018	37		700,000	600,000
Benchmark Botanics Inc.	Common Shares	Stowell, Claude Clifford	4	1/28/2019	10	0.45	1,014,600	-250,000
Big Rock Brewery Inc.	Common Shares	Noone, Patrick Donnell	4	1/24/2019	10	4.11	1,650,400	1,000

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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/ Disposed
Big Rock Brewery Inc.	Common Shares	Noone, Patrick Donnell	4	1/25/2019	10	4.24	1,655,400	5,000
Big Rock Brewery Inc.	Common Shares	Noone, Patrick Donnell	4	1/29/2019	10	4.11	1,674,400	19,000
Big Rock Brewery Inc.	Common Shares	Noone, Patrick Donnell	4	1/30/2019	10	4.34	1,694,400	20,000
Big Rock Brewery Inc.	Common Shares	Noone, Patrick Donnell	4	1/31/2019	10	4.44	1,700,800	6,400
Biomark Diagnostics Inc.	Common Shares	HUANG, GUOYU	5	1/31/2019	10	0.045	1,529,500	30,000
BioSynt Inc.	Common Shares	D'Souza, Alfred	5	1/30/2019	10	8.086	1,426,300	-23,500
Bold Capital Enterprises Ltd.	Common Shares	8419175 Canada Corp.	3	1/22/2019	00		700,000	
Bold Capital Enterprises Ltd.	Common Shares	Ishak, Nabil	4	1/22/2019	00		400,000	
Bold Capital Enterprises Ltd.	Common Shares	paradias, john	4	1/22/2019	00		800,000	
Bold Capital Enterprises Ltd.	Common Shares	Rona, Peter	5	9/17/2018	00			
Bold Capital Enterprises Ltd.	Common Shares	Rona, Peter	5	9/17/2018	00		400,000	
Bonterra Energy Corp.	Common Shares	Fink, George Frederick	3, 4, 5	1/28/2019	10	5.833	3,551,799	4,000
Bragg Gaming Group Inc. (formerly Breaking Data Corp.)	Common Shares	Petric, Matja	7	1/28/2019	00		134,000	
Bragg Gaming Group Inc. (formerly Breaking Data Corp.)	Common Shares	Waterlow, Rick	7	1/28/2019	00			
Bragg Gaming Group Inc. (formerly Breaking Data Corp.)	Common Shares	Waterlow, Rick	7	1/28/2019	00			
Bragg Gaming Group Inc. (formerly Breaking Data Corp.)	Common Shares	Waterlow, Rick	7	1/28/2019	00		82,181	
Bragg Gaming Group Inc. (formerly Breaking Data Corp.)	Options	Waterlow, Rick	7	1/28/2019	00			
Bragg Gaming Group Inc. (formerly Breaking Data Corp.)	Options	Waterlow, Rick	7	1/28/2019	00			
Bragg Gaming Group Inc. (formerly Breaking Data Corp.)	Options	Waterlow, Rick	7	1/28/2019	00		400,000	
Braveheart Resources Inc.	Common Shares	Berzins, Ian Martin	4, 5	1/31/2019	10	0.095	1,800,500	15,000
Brigadier Gold Limited	Common Shares	Hall, Grant	5	4/20/2018	10	0.1		50,000
Brigadier Gold Limited	Common Shares	Hall, Grant	5	4/20/2018	10	0.1	1,593,000	500,000
Brigadier Gold Limited	Common Shares	Hall, Grant	4, 5	11/15/2017	11	0.1	862,500	862,500
Brigadier Gold Limited	Common Shares	Hall, Grant	4, 5	11/19/2018	10			1,362,500
Brigadier Gold Limited	Common Shares	Hall, Grant	4, 5	11/19/2018	10		-500,000	-1,362,500
Brookfield Management Inc.	Asset	Preferred Shares Cass A Series 18	1	1/16/2019	38	20.78	1,107	1,107
Brookfield Management Inc.	Asset	Preferred Shares Cass A Series 18	1	1/16/2019	38		0	-1,107
Brookfield Management Inc.	Asset	Preferred Shares Cass A Series 18	1	1/17/2019	38	20.717	1,107	1,107
Brookfield Management Inc.	Asset	Preferred Shares Cass A Series 18	1	1/17/2019	38		0	-1,107
Brookfield Management Inc.	Asset	Preferred Shares Cass A Series 18	1	1/18/2019	38	20.952	1,107	1,107
Brookfield Management Inc.	Asset	Preferred Shares Cass A Series 18	1	1/18/2019	38		0	-1,107
Brookfield Management Inc.	Asset	Preferred Shares Cass A Series 18	1	1/21/2019	38	20.961	1,107	1,107
Brookfield Management Inc.	Asset	Preferred Shares Cass A Series 18	1	1/21/2019	38		0	-1,107
Brookfield Management Inc.	Asset	Preferred Shares Cass A Series 18	1	1/22/2019	38	20.55	1,107	1,107
Brookfield Management Inc.	Asset	Preferred Shares Cass A Series 18	1	1/22/2019	38		0	-1,107



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Issuer Name		Security		Insider Name		Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/ Disposed
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38	20.4	1,107	1,107
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38		0	-1,107
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38	20.8	1,200	1,200
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38		0	-1,200
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38	20.8	1,232	1,232
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38		0	-1,232
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38	20.921	1,232	1,232
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38		0	-1,232
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38	20.884	1,232	1,232
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38		0	-1,232
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38	20.51	1,232	1,232
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38		0	-1,232
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38	20.123	1,232	1,232
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38		0	-1,232
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38	18.45	1,358	1,358
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38		0	-1,358
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38	18.236	1,358	1,358
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38		0	-1,358
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38	17.899	1,358	1,358
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38		0	-1,358
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38	17.502	1,358	1,358
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38		0	-1,358
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38	18.107	1,584	1,584
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38		0	-1,584
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38	17.95	500	500
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38		0	-500
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38	18.362	1,584	1,584
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38		0	-1,584
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38	17.87	1,584	1,584
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38		0	-1,584
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38	17730	1,584	1,584
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38		0	-1,584
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/24/2019	38	17.252	1,584	1,584

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Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/24/2019	38		0	-1,584
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38	16.49	3,420	1,710
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38		1,710	-1,710
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38	16.459	3,420	1,710
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38		1,710	-1,710
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38	16.355	3,410	1,700
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38		1,710	-1,700
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38	15.785	3,010	1,300
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38		1,710	-1,300
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38	15.84	3,420	1,710
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38		1,710	-1,710
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38	15.64	3,420	1,710
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38		1,710	-1,710
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38	22.5	2,184	2,184
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38		0	-2,184
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38	22.211	2,184	2,184
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38		0	-2,184
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38	22.325	2,184	2,184
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38		0	-2,184
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38	22.299	2,184	2,184
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38		0	-2,184
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38	22.26	2,184	2,184
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38		0	-2,184
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/24/2019	38	21.522	2,184	2,184
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/24/2019	38		0	-2,184
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38	22.987	3,239	3,239
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38		0	-3,239
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38	22.95	3,239	3,239
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38		0	-3,239
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38	23	3,239	3,239
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38		0	-3,239
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38	22.887	3,239	3,239
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38		0	-3,239

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Issuer Name		Security		Insider Name		Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/ Disposed
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38	22.533	3,239	3,239
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38		0	-3,239
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38	22.408	3,239	3,239
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38		0	-3,239
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38	20.7	1,271	1,271
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38		0	-1,271
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38	20.69	1,271	1,271
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38		0	-1,271
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38	20.794	1,271	1,271
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38		0	-1,271
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38	20.617	1,271	1,271
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38		0	-1,271
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38	20.23	1,271	1,271
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38		0	-1,271
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38	20.26	1,271	1,271
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38		0	-1,271
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38	21.3	1,199	1,199
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38		0	-1,199
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38	21.359	1,199	1,199
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38		0	-1,199
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38	21.508	1,199	1,199
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38		0	-1,199
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38	21.308	1,199	1,199
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38		0	-1,199
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38	21.085	1,199	1,199
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38		0	-1,199
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38	22.23	1,644	1,644
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38		0	-1,644
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38	22.11	1,644	1,644
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38		0	-1,644
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38	22.229	1,644	1,644
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38		0	-1,644
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38	22	1,644	1,644

**Insider Reporting**

Issuer Name		Security		Insider Name		Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38		0	-1,644
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38	21.911	1,644	1,644
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38		0	-1,644
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38	21.74	1,644	1,644
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38		0	-1,644
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38	20.6	1,132	1,132
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38		0	-1,132
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38	20.406	1,132	1,132
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38		0	-1,132
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38	20.419	1,132	1,132
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38		0	-1,132
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38	20.05	1,132	1,132
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38		0	-1,132
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38	19.997	1,132	1,132
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38		0	-1,132
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/24/2019	38	19.303	1,132	1,132
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/24/2019	38		0	-1,132
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38	21.272	2,085	2,085
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38		0	-2,085
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38	21.38	2,085	2,085
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38		0	-2,085
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38	21.253	2,085	2,085
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38		0	-2,085
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38	20.99	2,085	2,085
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38		0	-2,085
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38	20.39	2,085	2,085
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38		0	-2,085
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38	21.14	1,400	1,400
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38		0	-1,400
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38	21.437	1,400	1,400
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38		0	-1,400
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38	21.26	1,400	1,400
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38		0	-1,400

**Insider Reporting**

Issuer Name		Security		Insider Name		Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38	20.76	1,400	1,400
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38		0	-1,400
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38	20.43	1,400	1,400
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38		0	-1,400
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38	26	400	400
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38		0	-400
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38	26.041	1,746	1,746
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38		0	-1,746
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38	26.021	1,746	1,746
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38		0	-1,746
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38	26	1,746	1,746
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38		0	-1,746
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38	25.86	1,746	1,746
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38		0	-1,746
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38	25.602	1,746	1,746
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38		0	-1,746
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/24/2019	38	25.665	1,746	1,746
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/24/2019	38		0	-1,746
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38	25.2	2,183	2,183
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38		0	-2,183
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38	25.41	2,183	2,183
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38		0	-2,183
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38	25.5	2,183	2,183
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38		0	-2,183
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38	25.5	2,183	2,183
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38	25.657	4,366	2,183
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38		2,183	-2,183
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38	25.344	4,366	2,183
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38		2,183	-2,183
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38	25.25	4,366	2,183
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38		2,183	-2,183
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/24/2019	38	25.279	4,366	2,183
Brookfield Management Inc.	Asset	Preferred	Shares	Brookfield Management Inc.	Asset	1	1/24/2019	38		2,183	-2,183

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Issuer Name		Security		Insider Name		Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Brookfield Management Inc.	Asset	Preferred Class A Series 48	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38	24.65	3,123	3,123
Brookfield Management Inc.	Asset	Preferred Class A Series 48	Shares	Brookfield Management Inc.	Asset	1	1/16/2019	38		0	-3,123
Brookfield Management Inc.	Asset	Preferred Class A Series 48	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38	24.7	3,123	3,123
Brookfield Management Inc.	Asset	Preferred Class A Series 48	Shares	Brookfield Management Inc.	Asset	1	1/17/2019	38		0	-3,123
Brookfield Management Inc.	Asset	Preferred Class A Series 48	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38	24.51	1,300	1,300
Brookfield Management Inc.	Asset	Preferred Class A Series 48	Shares	Brookfield Management Inc.	Asset	1	1/18/2019	38		0	-1,300
Brookfield Management Inc.	Asset	Preferred Class A Series 48	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38	24.57	3,123	3,123
Brookfield Management Inc.	Asset	Preferred Class A Series 48	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38	24.57		3,123
Brookfield Management Inc.	Asset	Preferred Class A Series 48	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38	24.57		3,123
Brookfield Management Inc.	Asset	Preferred Class A Series 48	Shares	Brookfield Management Inc.	Asset	1	1/21/2019	38		0	-3,123
Brookfield Management Inc.	Asset	Preferred Class A Series 48	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38	24.47	3,123	3,123
Brookfield Management Inc.	Asset	Preferred Class A Series 48	Shares	Brookfield Management Inc.	Asset	1	1/22/2019	38		0	-3,123
Brookfield Management Inc.	Asset	Preferred Class A Series 48	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38	24.399	3,123	3,123
Brookfield Management Inc.	Asset	Preferred Class A Series 48	Shares	Brookfield Management Inc.	Asset	1	1/23/2019	38		0	-3,123
BTB Investment Trust	Real Estate	Parts avec restrictions		Cyr, Benoit		5	1/25/2019	57	4.5675	21,838	-10,504
BTB Investment Trust	Real Estate	Trust Units		Cyr, Benoit		5	12/31/2018	35	4.489	97,282	8,547
BTB Investment Trust	Real Estate	Trust Units		Cyr, Benoit		5	1/25/2019	57	4.5675	107,786	10,504
BTB Investment Trust	Real Estate	Trust Units		Cyr, Benoit		5	1/25/2019	35	4.5675	111,206	3,420
BTB Investment Trust	Real Estate	Parts avec restrictions		Léonard, Michel		4, 5	1/25/2019	57	4.5675	65,040	-23,253
BTB Investment Trust	Real Estate	Trust Units		Léonard, Michel		4, 5	1/25/2019	57	4.5675	126,615	23,253
BTB Investment Trust	Real Estate	Trust Units		Léonard, Michel		4, 5	1/25/2019	35	4.5675	134,186	7,571
Buhler Industries Inc.	Common Shares			Buhler, John		3, 4	1/30/2019	10	3.61	3,799,786	200
Bunker Hill Mining Corp. (formerly, Liberty Silver Corp.)	Common Shares			Parsons, Wayne	Steven	4	1/22/2019	00		333,333	
Bunker Hill Mining Corp. (formerly, Liberty Silver Corp.)	Warrants			Parsons, Wayne	Steven	4	1/22/2019	00		333,333	
Cabral Gold Inc.	Options			Carter, Alan		4, 6, 5	10/30/2017	00			
Cabral Gold Inc.	Options			Carter, Alan		4, 6, 5	1/23/2019	50	0.25		500,000
Cabral Gold Inc.	Options			Carter, Alan		4, 6, 5	1/23/2019	50	0.25	500,000	500,000
Cabral Gold Inc.	Options			Hansed, Paul Taylor		5	10/30/2017	00			
Cabral Gold Inc.	Options			Hansed, Paul Taylor		5	1/23/2019	50	0.25	200,000	200,000
Calian Group Ltd.	Common Shares			Basler, Raymond Gregory		4	2/1/2019	30	30.75	44,630	113
Calian Group Ltd.	Common Shares			Gauthier, Jacqueline		5	2/1/2019	30	30.75	18,851	1,068
Calian Group Ltd.	Common Shares			Park, Young		4	9/1/2017	00			
Calian Group Ltd.	Common Shares			Park, Young		4	2/1/2019	30	30.75	113	113
Calian Group Ltd.	Common Shares			Poirier, Jo-Anne Cecile		4	2/1/2019	30	30.75	230	113
Calian Group Ltd.	Common Shares			Vickers, Richard Allan		4	2/1/2019	30	30.75	4,984	113
Calian Group Ltd.	Common Shares			weber, george brian		4	2/1/2019	30	30.75	3,366	113
California Gold Mining Inc.	Gold Mining	Options		Rasenberg, Scott Michael		4	1/25/2019	50	0.5	500,000	380,000
Canacol Energy Ltd.	Restricted Share Units			Baena, Luis Alfredo		5	1/26/2019	59		20,000	-25,000

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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Canacol Energy Ltd.	Restricted Share Units	Baena, Luis Alfredo	5	1/28/2019	56		83,000	63,000
Canacol Energy Ltd.	Restricted Share Units	Bednar, Jason Michael	5	1/26/2019	59		20,000	-25,000
Canacol Energy Ltd.	Restricted Share Units	Bednar, Jason Michael	5	1/28/2019	56		83,000	63,000
Canacol Energy Ltd.	Common Shares	Canacol Energy Ltd.	1	1/25/2019	38	4.4317	134,578	21,000
Canacol Energy Ltd.	Common Shares	Canacol Energy Ltd.	1	1/28/2019	38	4.411		17,500
Canacol Energy Ltd.	Common Shares	Canacol Energy Ltd.	1	1/28/2019	38	4.4082	147,978	13,400
Canacol Energy Ltd.	Common Shares	Canacol Energy Ltd.	1	1/29/2019	38	4.4168	173,204	25,226
Canacol Energy Ltd.	Common Shares	Canacol Energy Ltd.	1	1/30/2019	38	4.4407	204,330	31,126
Canacol Energy Ltd.	Common Shares	Canacol Energy Ltd.	1	2/1/2019	38	4.3448	224,330	20,000
Canacol Energy Ltd.	Restricted Share Units	Carvajal, Diego Alfonso	5	1/26/2019	59		7,500	-12,500
Canacol Energy Ltd.	Restricted Share Units	Carvajal, Diego Alfonso	5	1/28/2019	56		64,500	57,000
Canacol Energy Ltd.	Restricted Share Units	Cisneros Fajardo, Oswaldo Jesus	4	1/26/2019	59		3,000	-3,750
Canacol Energy Ltd.	Restricted Share Units	Cisneros Fajardo, Oswaldo Jesus	4	1/28/2019	56		12,500	9,500
Canacol Energy Ltd.	Restricted Share Units	Diaz Salazar, Francisco	4	1/26/2019	59		3,000	-3,750
Canacol Energy Ltd.	Restricted Share Units	Diaz Salazar, Francisco	4	1/28/2019	56		12,500	9,500
Canacol Energy Ltd.	Restricted Share Units	Elliott, Greg	4	1/26/2019	59		3,000	-3,750
Canacol Energy Ltd.	Restricted Share Units	Elliott, Greg	4	1/28/2019	56		12,500	9,500
Canacol Energy Ltd.	Restricted Share Units	Fernandez-Tinoco, Gonzalo	4	11/8/2018	00			
Canacol Energy Ltd.	Restricted Share Units	Fernandez-Tinoco, Gonzalo	4	1/28/2019	56		9,500	9,500
Canacol Energy Ltd.	Restricted Share Units	Flick, Kevin James	5	1/26/2019	59		5,000	-6,250
Canacol Energy Ltd.	Restricted Share Units	Flick, Kevin James	5	1/28/2019	56		17,500	12,500
Canacol Energy Ltd.	Restricted Share Units	Gamba, Charle	4, 5	1/26/2019	59		20,000	-37,500
Canacol Energy Ltd.	Restricted Share Units	Gamba, Charle	4, 5	1/28/2019	56		105,000	85,000
Canacol Energy Ltd.	Restricted Share Units	Hibberd, Michael John	4	1/26/2019	59	4.45	4,000	-5,000
Canacol Energy Ltd.	Restricted Share Units	Hibberd, Michael John	4	1/28/2019	56	4.42	16,667	12,667
Canacol Energy Ltd.	Restricted Share Units	Sharma, Ravi	5	1/26/2019	59		20,000	-25,000
Canacol Energy Ltd.	Restricted Share Units	Sharma, Ravi	5	1/28/2019	56		83,000	63,000
Canacol Energy Ltd.	Restricted Share Units	Teare, Mark Reginald	5	1/26/2019	59		20,000	-25,000
Canacol Energy Ltd.	Restricted Share Units	Teare, Mark Reginald	5	1/28/2019	56		83,000	63,000
Canacol Energy Ltd.	Restricted Share Units	Winter, David A	4	1/26/2019	59		3,000	-3,750
Canacol Energy Ltd.	Restricted Share Units	Winter, David A	4	1/28/2019	56		12,500	9,500
Canacol Energy Ltd.	Restricted Share Units	Zaidi, Anthony Amar	5	1/26/2019	59		20,000	-25,000
Canacol Energy Ltd.	Restricted Share Units	Zaidi, Anthony Amar	5	1/28/2019	56		83,000	63,000
Canada Jetlines Ltd.	Common Shares Common & Variable Voting Shares	Surintas, Zygimantas	4	1/20/2019	00			
Canadian Apartment Properties Real Estate Investment Trust	Trust Units	Cody, Gina Parvaneh	4	5/24/2017	00		9,000	
Canadian Apartment Properties Real Estate Investment Trust	Trust Units	Cody, Gina Parvaneh	4	12/21/2018	15	45.5	11,000	2,000
Canadian Apartment Properties Real Estate Investment Trust	Trust Units	Cody, Gina Parvaneh	4	5/24/2017	00		6,500	
Canadian Apartment Properties Real Estate Investment Trust	Trust Units	Cody, Gina Parvaneh	4	12/21/2018	15	45.5	8,500	2,000
Canadian Apartment Properties Real Estate Investment Trust	Trust Units	Cody, Gina Parvaneh	4	5/24/2017	00		2,000	
Canadian Metals Inc.	Warrants	Cantore, Victor	4, 5	6/9/2017	55	0.25	0	-140,000
Canadian National Railway Company	Common Shares	Finn, Sean	5	1/31/2019	51	52.78	24,176	10,426
Canadian National Railway Company	Common Shares	Finn, Sean	5	1/31/2019	10	109.98	13,750	-10,426
Canadian National Railway Company	Options	Finn, Sean	5	1/31/2019	51	52.78		-10,426

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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Canadian National Railway Company	Options	Finn, Sean	5	1/31/2019	51	52.78		-10,426
Canadian National Railway Company	Options	Finn, Sean	5	1/31/2019	51	52.78		-10,426
Canadian National Railway Company	Options	Finn, Sean	5	1/31/2019	51	52.78	125,744	-10,426
Canadian National Railway Company	Common Shares	Madigan, Kimberley A.	5	1/31/2019	10	83.42	4,164	-14,500
Canadian Resources Limited	Options	Bieber, Corey B.	5	2/1/2019	50	35.27	385,000	67,500
Canadian Resources Limited	Common Shares	Cassidy, Trevor James	5	12/31/2018	30	42.1	24,080	1,975
Canadian Resources Limited	Options	Cassidy, Trevor James	5	2/1/2019	50	35.27	190,500	47,500
Canadian Resources Limited	Common Shares	Cusson, Réal, Michel	5	2/2/2019	30	40.37	708,688	8,265
Canadian Resources Limited	Options	Cusson, Réal, Michel	5	2/1/2019	50	35.27	195,500	47,500
Canadian Resources Limited	PSUs	Edwards, Norman Murray	4, 5	12/31/2018	30		342,583	4,424
Canadian Resources Limited	PSUs	Edwards, Norman Murray	4, 5	12/31/2018	30		345,418	2,835
Canadian Resources Limited	Options	Fichter, Darren	5	2/1/2019	50	35.27	472,500	67,500
Canadian Resources Limited	Options	Frankiw, Allan E	5	2/1/2019	50	35.27	240,000	47,500
Canadian Resources Limited	Options	Kim, Ronald Dae Jung	5	2/1/2019	50	35.27	59,510	15,000
Canadian Resources Limited	Options	McKay, Timothy Shawn	5	2/1/2019	50	35.27	1,177,500	187,500
Canadian Resources Limited	Options	Stagg, Kendall W.	5	2/1/2019	50	35.27	402,500	47,500
Canadian Resources Limited	Options	Stainthorpe, Mark Allen	5	2/1/2019	50	35.27	59,800	15,000
Canadian Resources Limited	Options	Yee, Betty	5	2/1/2019	50	35.27	83,275	15,000
Canadian Resources Limited	Options	Zabek, Robin Sean	5	2/1/2019	50	35.27	165,750	47,500
Canadian Railway Limited	Options	Brooks, John Kenneth	5	1/25/2019	50	205.31	33,770	7,484
Canadian Railway Limited	Options	Bullard, Coby Wade	5	1/25/2019	50	205.31	8,125	2,028
Canadian Railway Limited	Common Shares	Canadian Railway Limited	1	1/2/2019	38	241.31	130,000	30,000
Canadian Railway Limited	Common Shares	Canadian Railway Limited	1	1/2/2019	38		80,000	-50,000
Canadian Railway Limited	Common Shares	Canadian Railway Limited	1	1/3/2019	38	237.77	110,000	30,000
Canadian Railway Limited	Common Shares	Canadian Railway Limited	1	1/3/2019	38		60,000	-50,000
Canadian Railway Limited	Common Shares	Canadian Railway Limited	1	1/4/2019	38	241.68	87,000	27,000
Canadian Railway Limited	Common Shares	Canadian Railway Limited	1	1/4/2019	38		57,000	-30,000
Canadian Railway Limited	Common Shares	Canadian Railway Limited	1	1/7/2019	38	244.3	82,000	25,000
Canadian Railway Limited	Common Shares	Canadian Railway Limited	1	1/7/2019	38		52,000	-30,000
Canadian Railway Limited	Common Shares	Canadian Railway Limited	1	1/8/2019	38	249	72,000	20,000
Canadian Railway Limited	Common Shares	Canadian Railway Limited	1	1/8/2019	38		45,000	-27,000
Canadian Railway Limited	Common Shares	Canadian Railway Limited	1	1/9/2019	38	251.59	62,300	17,300
Canadian Railway Limited	Common Shares	Canadian Railway Limited	1	1/9/2019	38		37,300	-25,000



**Insider Reporting**

Issuer Name		Security	Insider Name		Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/10/2019	38	251.66	55,782	18,482
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/10/2019	38		35,782	-20,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/11/2019	38	251.84	55,782	20,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/11/2019	38		38,482	-17,300
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/14/2019	38	254.89	53,582	15,100
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/14/2019	38		35,100	-18,482
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/15/2019	38	257.91	50,100	15,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/15/2019	38		30,100	-20,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/16/2019	38	256.97	45,100	15,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/16/2019	38		30,000	-15,100
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/17/2019	38	258.14	45,000	15,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/17/2019	38		30,000	-15,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/18/2019	38	262.01	45,000	15,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/18/2019	38		30,000	-15,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/21/2019	38	262.23	45,000	15,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/22/2019	38	261.36	60,000	15,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/22/2019	38		45,000	-15,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/23/2019	38	261.29	60,000	15,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/23/2019	38		30,000	-30,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/24/2019	38	268.94	45,000	15,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/24/2019	38		30,000	-15,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/25/2019	38	271.78	45,000	15,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/25/2019	38		30,000	-15,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/28/2019	38	268	40,000	10,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/28/2019	38		25,000	-15,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/29/2019	38	271	35,000	10,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/29/2019	38		20,000	-15,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/30/2019	38	273	30,000	10,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/30/2019	38		20,000	-10,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/31/2019	38	269	30,000	10,000
Canadian Railway Limited	Pacific	Common Shares	Canadian Railway Limited	Pacific	1	1/31/2019	38		20,000	-10,000
Canadian Railway Limited	Pacific	Options	Clements, Dominic Luther	James	5	1/25/2019	50	271.5	37,197	3,324
Canadian Railway Limited	Pacific	Options	Creel, Keith E.		5	1/25/2019	50	205.31	616,896	54,202

**Insider Reporting**

Issuer Name		Security		Insider Name		Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Canadian Railway Limited	Pacific	Options		Ellis, Jeffrey		5	1/25/2019	50	271.5	23,655	7,307
Canadian Railway Limited	Pacific	Options		Foran, Mike		5	1/25/2019	50	271.5	17,440	2,373
Canadian Railway Limited	Pacific	Options		Gray, Ian Robert		5	1/25/2019	50	271.5	8,083	1,638
Canadian Railway Limited	Pacific	Options		Hardy, Joan		5	1/25/2019	50	271.5	8,775	2,218
Canadian Railway Limited	Pacific	Options		Johnson, Robert Allen		5	1/25/2019	50	205.31	53,261	9,367
Canadian Railway Limited	Pacific	Options		MacDonald, Stanley Scott		5	1/25/2019	50	271.5	53,788	4,197
Canadian Railway Limited	Pacific	Options		Marquis, Tony		5	1/25/2019	50	271.5	39,961	4,556
Canadian Railway Limited	Pacific	Options		Meyer, Justin Dale		5	1/25/2019	50	271.5	17,726	2,684
Canadian Railway Limited	Pacific	Options		Pitz, Laird Joseph		5	1/25/2019	50	205.31	26,634	7,484
Canadian Railway Limited	Pacific	Options		Redd, Mark Ashley		5	1/25/2019	50	205.31	23,113	3,996
Canadian Railway Limited	Pacific	Options		Redeker, Michael		5	1/25/2019	50	271.5	36,853	3,324
Canadian Railway Limited	Pacific	Options		Rolstad, Chad		5	1/25/2019	50	205.31	4,326	1,433
Canadian Railway Limited	Pacific	Options		Velani, Nadeem		5	1/25/2019	50	271.5	42,813	16,313
Canadian Railway Limited	Pacific	Options		WAHBA, JONATHAN SHERIF		5	1/25/2019	50	271.5	12,783	2,285
Canadian Corporation, Limited	Tire	Non-Voting Class A	Shares	Canadian Corporation, Limited	Tire	1	1/28/2019	38	148.19	22,800	22,800
Canadian Corporation, Limited	Tire	Non-Voting Class A	Shares	Canadian Corporation, Limited	Tire	1	1/28/2019	38		0	-22,800
Canadian Corporation, Limited	Tire	Non-Voting Class A	Shares	Canadian Corporation, Limited	Tire	1	1/29/2019	38	148.39	22,800	22,800
Canadian Corporation, Limited	Tire	Non-Voting Class A	Shares	Canadian Corporation, Limited	Tire	1	1/29/2019	38		0	-22,800
Canadian Corporation, Limited	Tire	Non-Voting Class A	Shares	Canadian Corporation, Limited	Tire	1	1/30/2019	38	148.49	22,800	22,800
Canadian Corporation, Limited	Tire	Non-Voting Class A	Shares	Canadian Corporation, Limited	Tire	1	1/30/2019	38		0	-22,800
Canadian Corporation, Limited	Tire	Non-Voting Class A	Shares	Canadian Corporation, Limited	Tire	1	1/31/2019	38	150.25	22,800	22,800
Canadian Corporation, Limited	Tire	Non-Voting Class A	Shares	Canadian Corporation, Limited	Tire	1	1/31/2019	38		0	-22,800
Canadian Corporation, Limited	Tire	Non-Voting Class A	Shares	Canadian Corporation, Limited	Tire	1	2/1/2019	38	148.95	22,800	22,800
Canadian Corporation, Limited	Tire	Non-Voting Class A	Shares	Canadian Corporation, Limited	Tire	1	2/1/2019	38		0	-22,800
Canadian Corporation, Limited	Tire	Deferred Share Units		Wetmore, Stephen Gerald		4, 5	12/31/2018	35	162.52	68,000	1,389
Canadian Limited	Utilities	Non-Voting Class A	Shares	SIMPSON, JAMES W.		4	1/31/2019	90		8,200	2,000
Canadian Limited	Utilities	Non-Voting Class A	Shares	SIMPSON, JAMES W.		4	1/31/2019	90		0	-2,000
Canadian Western Bank		Common Shares		Bibby, Andrew John		4	1/3/2019	30	26.009	9,212	91
Canadian Western Bank		Common Shares		Bibby, Andrew John		4	1/3/2019	30	26.009	1,124	11
Canadian Western Bank		Preferred Series 9	Shares	Christensen, Lars Kurt		5	12/1/2006	00			
Canadian Western Bank		Preferred Series 9	Shares	Christensen, Lars Kurt		5	1/29/2019	15	25		800
Canadian Western Bank		Preferred Series 9	Shares	Christensen, Lars Kurt		5	1/29/2019	15	25		800
Canadian Western Bank		Preferred Series 9	Shares	Christensen, Lars Kurt		5	12/1/2006	00			
Canadian Western Bank		Preferred Series 9	Shares	Christensen, Lars Kurt		5	1/29/2019	15	25	800	800

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Canadian Western Bank	Preferred Series 9	Shares	Eastwood, Michael Glen	5	2/1/2011	00			
Canadian Western Bank	Preferred Series 9	Shares	Eastwood, Michael Glen	5	1/29/2019	15	25	1,500	1,500
Canadian Western Bank	Preferred Series 9	Shares	Fowler, Christopher Hector	5	11/1/2003	00			
Canadian Western Bank	Preferred Series 9	Shares	Fowler, Christopher Hector	5	11/1/2003	00			
Canadian Western Bank	Preferred Series 9	Shares	Fowler, Christopher Hector	5	1/29/2019	15	25	1,800	1,800
Canadian Western Bank	Preferred Series 9	Shares	Furlan, Mario Vittorio	5	1/1/2009	00			
Canadian Western Bank	Preferred Series 9	Shares	Furlan, Mario Vittorio	5	1/29/2019	15	25	1,000	1,000
Canadian Western Bank	Preferred Series 9	Shares	Graham, Carolyn Joan	5	5/8/2003	00			
Canadian Western Bank	Preferred Series 9	Shares	Graham, Carolyn Joan	5	1/29/2019	15	25	1,000	1,000
Canadian Western Bank	Preferred Series 9	Shares	Manning, Robert Adrian	4	11/27/2002	00			
Canadian Western Bank	Preferred Series 9	Shares	Manning, Robert Adrian	4	1/29/2019	15	25	10,000	10,000
Canadian Western Bank	Preferred Series 9	Shares	Manning, Robert Adrian	4	11/27/2002	00			
Canadian Western Bank	Preferred Series 9	Shares	Manning, Robert Adrian	4	1/29/2019	15	25	10,000	10,000
Canadian Western Bank	Preferred Series 9	Shares	Rowe, Alan Macdonald	4	1/1/2004	00			
Canadian Western Bank	Preferred Series 9	Shares	Rowe, Alan Macdonald	4	1/29/2019	15	25	6,000	6,000
Canadian Western Bank	Preferred Series 9	Shares	Rudd, Robin Matthew	5	4/23/2018	00			
Canadian Western Bank	Preferred Series 9	Shares	Rudd, Robin Matthew	5	1/29/2019	15	25	600	600
Canadian Western Bank	Preferred Series 9	Shares	Thomson, David Leslie John	5	12/15/2010	00			
Canadian Western Bank	Preferred Series 9	Shares	Thomson, David Leslie John	5	1/29/2019	15	25	2,000	2,000
Canarc Resource Corp.	Common Shares		Eldridge, Scott Richard	4, 5	1/25/2019	10	0.065	580,500	24,000
Canarc Resource Corp.	Common Shares		Eldridge, Scott Richard	4, 5	1/28/2019	10	0.065	619,500	39,000
Canarc Resource Corp.	Common Shares		Eldridge, Scott Richard	4, 5	1/29/2019	10	0.065	636,500	17,000
Candente Copper Corp.	Common Shares		Barry, Paul H.	4	1/30/2019	16	0.05	1,947,244	800,000
Candente Copper Corp.	Common Shares		Freeze, Joanne Constance	4, 5	1/30/2019	16	0.05	2,194,500	600,000
Canfor Corporation	Common Shares		Feldinger, Mark Andrew	7, 5	12/31/2018	30	26.78	1,643	1,587
Canlan Ice Sports Corp.	Common Shares		The Article 6 Marital Trust created under the First Amended and Restated Jerry Zucker Revocable Trust dated 4-2-07	3	1/23/2019	10	4.68	2,270,800	1,400
Canlan Ice Sports Corp.	Common Shares		The Article 6 Marital Trust created under the First Amended and Restated Jerry Zucker Revocable Trust dated 4-2-07	3	1/24/2019	10	4.65	2,271,100	300
Canlan Ice Sports Corp.	Common Shares		The Article 6 Marital Trust created under the First Amended and Restated Jerry Zucker Revocable Trust dated 4-2-07	3	1/24/2019	10	4.68	2,271,200	100

**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/ Disposed
Canlan Ice Sports Corp.	Common Shares	The Article 6 Marital Trust created under the First Amended and Restated Jerry Zucker Revocable Trust dated 4-2-07	3	1/28/2019	10	4.68	2,272,400	1,200
Canlan Ice Sports Corp.	Common Shares	The Article 6 Marital Trust created under the First Amended and Restated Jerry Zucker Revocable Trust dated 4-2-07	3	1/29/2019	10	4.65	2,272,700	300
Canlan Ice Sports Corp.	Common Shares	The Article 6 Marital Trust created under the First Amended and Restated Jerry Zucker Revocable Trust dated 4-2-07	3	1/29/2019	10	4.68	2,272,800	100
Canlan Ice Sports Corp.	Common Shares	The Article 6 Marital Trust created under the First Amended and Restated Jerry Zucker Revocable Trust dated 4-2-07	3	1/29/2019	10	4.7	2,273,200	400
Canlan Ice Sports Corp.	Common Shares	The Article 6 Marital Trust created under the First Amended and Restated Jerry Zucker Revocable Trust dated 4-2-07	3	1/30/2019	10	4.65	2,273,400	200
Canlan Ice Sports Corp.	Common Shares	The Article 6 Marital Trust created under the First Amended and Restated Jerry Zucker Revocable Trust dated 4-2-07	3	1/31/2019	10	4.68	2,273,500	100
Canlan Ice Sports Corp.	Common Shares	The Article 6 Marital Trust created under the First Amended and Restated Jerry Zucker Revocable Trust dated 4-2-07	3	1/31/2019	10	4.71	2,273,800	300
Canlan Ice Sports Corp.	Common Shares	The Article 6 Marital Trust created under the First Amended and Restated Jerry Zucker Revocable Trust dated 4-2-07	3	2/1/2019	10	4.65	2,274,400	600
Cannabix Technologies Inc	Common Shares	Clarke, Thomas William	4	1/28/2019	10	2	60,500	-15,300
Cannara Biotech Inc. (formerly, Dunbar Capital Corp.)	Common Shares	Carroll, Donal	6	1/30/2019	10	0.197	0	-500,000
Cannvas MedTech Inc.	Common Shares	Loutskou, Steve	3, 4, 5	1/30/2019	10	0.295	7,030,404	10,000
Cannvas MedTech Inc.	Common Shares	Loutskou, Steve	3, 4, 5	1/31/2019	10	0.29	7,032,904	2,500
Cannvas MedTech Inc.	Common Shares	Moniz, Shawn	3, 4, 5	1/30/2019	10	0.2789	7,204,291	38,500
Canoe EIT Income Fund	Preferred Shares B	Lake, Darcy Malcolm	5	1/30/2019	10	24.31	4,000	400
Canoe EIT Income Fund	Preferred Shares B	Lake, Darcy Malcolm	5	2/1/2019	10	24.31	4,400	400
Canoe EIT Income Fund	Preferred Shares B	Lake, Darcy Malcolm	5	2/1/2019	10	24.47	4,000	-400
Canopy Corporation	Growth Rights	Restricted Stock Units	Hanson, Robert Lee	4	11/2/2018	00		
Canopy Corporation	Growth Rights	Restricted Stock Units	Hanson, Robert Lee	4	12/13/2018	56	3,650	3,650
Canopy Corporation	Growth Options		Krahn, Reinhold	5	12/24/2018	50	265,000	15,000
Canopy Corporation	Growth Options		Linton, Bruce	3, 4, 5	12/24/2018	50	959,873	250,000
Canopy Corporation	Growth Options		Pryce, Dave	5	12/24/2018	50	170,000	50,000

**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Canopy Corporation	Growth Options	Saunders, Timothy Rob	5	12/24/2018	50		683,333	250,000
Canopy Corporation	Growth Options	Shaer, Phillip	5	12/24/2018	50		203,334	100,000
Canopy Corporation	Growth Options	Wadasinghe, Ru	5	12/24/2018	50		250,001	100,000
Canopy Corporation	Growth Options	Zekulin, Mark Anthony Nicholas	5	12/24/2018	50		783,333	250,000
Canopy Rivers Inc.	Options	Alexandrian, Narbe	5	1/17/2019	00		400,000	
Capital Corporation	Power Common Shares	DeNeve, Bryan	5	1/23/2019	10	28.538	55,540	-200
Capital Corporation	Power Options	TRUFYN, DARCY	5	1/25/2019	59	28.75	388,721	-450
Capital Corporation	Power Common Shares	Vaasjo, Brian Tellef	4, 5	1/21/2019	10	28.61	118,192	-36,401
Capital Corporation	Power Common Shares	Vaasjo, Brian Tellef	4, 5	1/22/2019	10	28.58	118,192	-60,000
Capital Corporation	Power Common Shares	Vaasjo, Brian Tellef	4, 5	1/23/2019	51	24.27	118,192	65,000
Capital Corporation	Power Options	Vaasjo, Brian Tellef	4, 5	1/23/2019	51		1,611,807	-65,000
Capstone Mining Corp.	Common Shares	Howe, Jason Paul	5	1/29/2019	57		673,694	138,620
Capstone Mining Corp.	Common Shares	Howe, Jason Paul	5	1/29/2019	57	0.6	758,390	84,696
Capstone Mining Corp.	Performance Share Units	Howe, Jason Paul	5	1/29/2019	57	0.6	409,932	-84,696
Capstone Mining Corp.	Performance Share Units	Howe, Jason Paul	5	1/29/2019	57	0.6	218,492	-191,440
Capstone Mining Corp.	Restricted Share Units	Howe, Jason Paul	5	1/29/2019	57	0.6	246,763	-138,620
Capstone Mining Corp.	Restricted Share Units	Howe, Jason Paul	5	1/29/2019	97	0.6	109,247	-137,516
Capstone Mining Corp.	Common Shares	King, Wendy	7	1/29/2019	57	0.6	255,477	138,620
Capstone Mining Corp.	Common Shares	King, Wendy	7	1/29/2019	57	0.6	340,173	84,696
Capstone Mining Corp.	Performance Share Units	King, Wendy	7	1/29/2019	57	0.6	395,548	-84,696
Capstone Mining Corp.	Performance Share Units	King, Wendy	7	1/29/2019	97	0.6	204,108	-191,440
Capstone Mining Corp.	Restricted Share Units	King, Wendy	7	1/29/2019	57	0.6	239,570	-138,620
Capstone Mining Corp.	Restricted Share Units	King, Wendy	7	1/29/2019	97	0.6	102,054	-137,516
Capstone Mining Corp.	Common Shares	Mercer, Bradley	5	1/29/2019	57	0.6	254,965	190,625
Capstone Mining Corp.	Common Shares	Mercer, Bradley	5	1/29/2019	57	0.6	371,436	116,471
Capstone Mining Corp.	Performance Share Units	Mercer, Bradley	5	1/29/2019	56	0.6		-116,471
Capstone Mining Corp.	Performance Share Units	Mercer, Bradley	5	1/29/2019	57	0.6	501,996	-116,471
Capstone Mining Corp.	Performance Share Units	Mercer, Bradley	5	1/29/2019	57	0.6		-250,115
Capstone Mining Corp.	Performance Share Units	Mercer, Bradley	5	1/29/2019	57	0.6	251,881	-250,115
Capstone Mining Corp.	Restricted Share Units	Mercer, Bradley	5	1/29/2019	57	0.6	301,902	-190,625
Capstone Mining Corp.	Restricted Share Units	Mercer, Bradley	5	1/29/2019	57	0.6	125,941	-175,961
Capstone Mining Corp.	Common Shares	Pylot, Darren Murvin	4, 5	1/29/2019	57	0.6	2,074,554	834,289
Capstone Mining Corp.	Common Shares	Pylot, Darren Murvin	4, 5	1/29/2019	57	0.6	2,584,304	509,750
Capstone Mining Corp.	Performance Share Units	Pylot, Darren Murvin	4, 5	1/29/2019	57	0.6	2,245,188	-509,750
Capstone Mining Corp.	Performance Share Units	Pylot, Darren Murvin	4, 5	1/29/2019	97	0.6	1,093,006	-1,152,182
Capstone Mining Corp.	Restricted Share Units	Pylot, Darren Murvin	4, 5	1/29/2019	57	0.6	1,374,146	-834,289
Capstone Mining Corp.	Restricted Share Units	Pylot, Darren Murvin	4, 5	1/29/2019	97	0.6	546,504	-827,642
Cardinal Energy Ltd.	Debentures	Cardinal Energy Ltd.	1	1/14/2019	38	945	\$6	\$6
Cardinal Energy Ltd.	Debentures	Cardinal Energy Ltd.	1	1/15/2019	38	945	\$12	\$6
Cardinal Energy Ltd.	Debentures	Cardinal Energy Ltd.	1	1/16/2019	38	945	\$18	\$6
Cardinal Energy Ltd.	Debentures	Cardinal Energy Ltd.	1	1/17/2019	38	945	\$24	\$6
Cardinal Energy Ltd.	Debentures	Cardinal Energy Ltd.	1	1/18/2019	38	945	\$30	\$6
Cardinal Energy Ltd.	Debentures	Cardinal Energy Ltd.	1	1/23/2019	38	945	\$36	\$6

**Insider Reporting**

Issuer Name	Security		Insider Name		Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/ Disposed
Cardinal Energy Ltd.	Debentures		Cardinal Energy Ltd.		1	1/24/2019	38	945	\$42	\$6
Cardinal Energy Ltd.	Debentures		Cardinal Energy Ltd.		1	1/25/2019	38	955	\$48	\$6
Cardinal Energy Ltd.	Debentures		Cardinal Energy Ltd.		1	1/30/2019	38	930	\$49	\$1
Carl Data Solutions Inc.	Common Shares		Scharfe, Bradley Nixon		3	1/28/2019	10	0.095	8,173,918	45,000
Celestica Inc.	Restricted Share Units		Chawla, Mandeep		5	1/30/2019	57	12.7	80,885	-18,395
Celestica Inc.	Restricted Share Units		Chawla, Mandeep		5	1/31/2019	57	12.9	76,614	-4,271
Celestica Inc.	Subordinate Shares	Voting	Chawla, Mandeep		5	1/30/2019	57	12.7	25,770	8,548
Celestica Inc.	Subordinate Shares	Voting	Chawla, Mandeep		5	1/31/2019	57	12.9	27,754	1,984
Celestica Inc.	Restricted Share Units		Cooper, Christopher	Todd	5	1/30/2019	57	9.62	307,069	-20,298
Celestica Inc.	Subordinate Shares	Voting	Cooper, Christopher	Todd	5	1/4/2018	00			
Celestica Inc.	Subordinate Shares	Voting	Cooper, Christopher	Todd	5	1/30/2019	57	9.62	10,891	10,891
Celestica Inc.	Restricted Share Units		DelBianco, Elizabeth		7, 5	1/30/2019	57	12.7	73,466	-19,346
Celestica Inc.	Restricted Share Units		DelBianco, Elizabeth		7, 5	1/31/2019	57	12.9	56,079	-17,387
Celestica Inc.	Subordinate Shares	Voting	DelBianco, Elizabeth		7, 5	1/30/2019	57	12.7	88,713	8,990
Celestica Inc.	Subordinate Shares	Voting	DelBianco, Elizabeth		7, 5	1/31/2019	57	12.9	96,792	8,079
Celestica Inc.	Restricted Share Units		Lawless, John Joseph		5	1/30/2019	57	9.62	78,468	-20,932
Celestica Inc.	Restricted Share Units		Lawless, John Joseph		5	1/31/2019	57	9.82	60,166	-18,302
Celestica Inc.	Subordinate Shares	Voting	Lawless, John Joseph		5	1/30/2019	57	9.62		11,020
Celestica Inc.	Subordinate Shares	Voting	Lawless, John Joseph		5	1/30/2019	57	9.62	62,878	11,020
Celestica Inc.	Subordinate Shares	Voting	Lawless, John Joseph		5	1/31/2019	57	9.82	72,514	9,636
Celestica Inc.	Restricted Share Units		McCaughey, Michael		7, 5	1/30/2019	59	12.7	80,956	-21,567
Celestica Inc.	Restricted Share Units		McCaughey, Michael		7, 5	1/31/2019	59	12.7		-21,567
Celestica Inc.	Restricted Share Units		McCaughey, Michael		7, 5	1/31/2019	59	12.9		-18,912
Celestica Inc.	Restricted Share Units		McCaughey, Michael		7, 5	1/31/2019	59	12.9	62,044	-18,912
Celestica Inc.	Restricted Share Units		Mionis, Robert Andrew		4, 7, 5	1/30/2019	57	9.62	316,894	-91,341
Celestica Inc.	Restricted Share Units		Mionis, Robert Andrew		4, 7, 5	1/31/2019	57	9.82	249,789	-67,105
Celestica Inc.	Subordinate Shares	Voting	Mionis, Robert Andrew		4, 7, 5	1/30/2019	57	9.62	245,313	55,398
Celestica Inc.	Subordinate Shares	Voting	Mionis, Robert Andrew		4, 7, 5	1/31/2019	57	9.82	286,012	40,699
Celestica Inc.	Restricted Share Units		Phillips, Jason		5	1/30/2019	57	9.62	80,085	-8,880
Celestica Inc.	Restricted Share Units		Phillips, Jason		5	1/31/2019	57	9.82	72,764	-7,321
Celestica Inc.	Subordinate Shares	Voting	Phillips, Jason		5	1/30/2019	57	9.62	30,233	6,242
Celestica Inc.	Subordinate Shares	Voting	Phillips, Jason		5	1/31/2019	57	9.82	35,379	5,146
Celestica Inc.	Restricted Share Units		Pujet, Nicolas		5	1/30/2019	57	9.62	26,204	-7,612
Celestica Inc.	Restricted Share Units		Pujet, Nicolas		5	1/31/2019	57	9.82	20,713	-5,491
Celestica Inc.	Subordinate Shares	Voting	Pujet, Nicolas		5	7/31/2016	00			
Celestica Inc.	Subordinate Shares	Voting	Pujet, Nicolas		5	1/30/2019	57	9.62	5,377	5,377
Celestica Inc.	Subordinate Shares	Voting	Pujet, Nicolas		5	1/31/2019	57	9.82	9,256	3,879
CERRO DE PASCO RESOURCES (formerly Genius Properties Ltd.)	Common Shares		Goulet, Guy		4, 5	1/29/2019	10	0.258	3,106,544	2,000
Cervus Corporation	Equipment	Common Shares	Cervus Corporation	Equipment	1	1/29/2019	38	13.45	1,800	1,800
Cervus Corporation	Equipment	Common Shares	Cervus Corporation	Equipment	1	1/30/2019	38	13.352	3,500	1,700
Cervus Corporation	Equipment	Common Shares	Cervus Corporation	Equipment	1	1/31/2019	38	13.24	4,000	500

**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Cervus Corporation	Equipment Common Shares	Cervus Corporation	1	2/1/2019	38	13.457	5,800	1,800
CGI Group Inc.	Subordinate Voting Shares Classe A	Boulanger, François	5	1/28/2019	30	78.487	11,589	587
CGI Group Inc.	Subordinate Voting Shares Classe A	Boyajian, Mark	5	1/28/2019	30	78.443	44	13
CGI Group Inc.	Subordinate Voting Shares Classe A	Boyajian, Mark	5	1/28/2019	30	78.438	1,760	556
CGI Group Inc.	Subordinate Voting Shares Classe A	Dube, Benoit	5	1/28/2019	30	78.475	2,011	230
CGI Group Inc.	Subordinate Voting Shares Classe A	Dube, Benoit	5	1/28/2019	30	78.424	5,889	231
CGI Group Inc.	Subordinate Voting Shares Classe A	Godin, Julie	4	1/28/2019	30	78.962	4,049	391
CGI Group Inc.	Subordinate Voting Shares Classe A	Godin, Serge	3, 4	1/28/2019	30	80.223	1,015	1,015
CGI Group Inc.	Subordinate Voting Shares Classe A	Gorber, Lorne Shawn	5	1/28/2019	30	82.474	91	38
CGI Group Inc.	Subordinate Voting Shares Classe A	Henderson, Dave	5	1/28/2019	30	60.608	9,428	626
CGI Group Inc.	Subordinate Voting Shares Classe A	Hurlebaus, Timothy	5	1/28/2019	30	60.616	8,701	588
CGI Group Inc.	Subordinate Voting Shares Classe A	Imbeau, André	3, 4, 5	1/28/2019	30	82.343	212	183
CGI Group Inc.	Subordinate Voting Shares Classe A	Keating, Michael John	5	1/28/2019	30	54.406	5,217	19
CGI Group Inc.	Subordinate Voting Shares Classe A	Keating, Michael John	5	5/30/2017	00		24	
CGI Group Inc.	Subordinate Voting Shares Classe A	Keating, Michael John	5	1/28/2019	30	79.565	354	330
CGI Group Inc.	Subordinate Voting Shares Classe A	Linder, Kevin Morris	5	1/28/2019	30	81.795	103	103
CGI Group Inc.	Subordinate Voting Shares Classe A	Mattackal, George Jacob	5	1/28/2019	30	60.207	1,232	306
CGI Group Inc.	Subordinate Voting Shares Classe A	MCGEEHAN, TARA	5	1/28/2019	30	61.448	1,481	346
CGI Group Inc.	Subordinate Voting Shares Classe A	Nikku, Heikki	5	1/28/2019	30	61.771	1,275	430
CGI Group Inc.	Subordinate Voting Shares Classe A	Perron, Steve	5	1/28/2019	30	78.443	2,468	285
CGI Group Inc.	Subordinate Voting Shares Classe A	Rocheleau, Daniel	5	1/28/2019	30	78.438	1,978	484
CGI Group Inc.	Subordinate Voting Shares Classe A	Schindler, George Donald	4, 5	1/28/2019	30	60.67	29,680	1,101
CGI Group Inc.	Subordinate Voting Shares Classe A	Strass, Torsten	5	1/28/2019	30	62.947	3,038	310
CGI Group Inc.	Subordinate Voting Shares Classe A	Vigeant, Guy	5	1/28/2019	30	78.483	20,219	345
CGI Group Inc.	Deferred Stock Unit (DSUs) / Unités d'actions différées UAD	Waller, Kathy Nadine	4	1/17/2019	56	86.39		182
CGI Group Inc.	Deferred Stock Unit (DSUs) / Unités d'actions différées UAD	Waller, Kathy Nadine	4	1/17/2019	56	86.39	241	241
Chemesis International Inc.	Common Shares	Parmar, Amandeep Singh	4	1/25/2019	10	1.5	7,377,133	12,000
Chimata Gold Corp.	Common Class A Shares	Rosner, Robert	4	9/25/2017	50	0.15		500,000
Chimata Gold Corp.	Common Class A Shares	Rosner, Robert	4	9/25/2017	50	0.15		500,000
Chimata Gold Corp.	Common Class A Shares	Rosner, Robert	4	12/1/2017	50	0.15		500,000
Chimata Gold Corp.	Common Class A Shares	Rosner, Robert	4	12/1/2017	50	0.15		500,000

**Insider Reporting**

Issuer Name	Security		Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Chimata Gold Corp.	Common Class A	Shares	Rosner, Robert	4	6/11/2018	50	0.15		200,000
Chimata Gold Corp.	Common Class A	Shares	Rosner, Robert	4	6/11/2018	50	0.15		200,000
Chimata Gold Corp.	Options		Rosner, Robert	4	1/21/2017	00			
Chimata Gold Corp.	Options		Rosner, Robert	4	9/25/2017	50	0.15	500,000	500,000
Chimata Gold Corp.	Options		Rosner, Robert	4	12/1/2017	50	0.15	1,000,000	500,000
Chimata Gold Corp.	Options		Rosner, Robert	4	6/11/2018	50	0.15	1,200,000	200,000
Chinook Energy Inc.	Options		Wierzba, P. Grant	4, 5	1/8/2019	50			155,000
Chinook Energy Inc.	Options		Wierzba, P. Grant	4, 5	1/8/2019	50		553,800	155,000
Choom Holdings Inc.	Common Shares		Chris, Bogart	4	1/22/2019	10	0.47	3,459,750	30,000
Choom Holdings Inc.	Common Shares		Chris, Bogart	4	1/23/2019	10	0.4517	3,474,750	15,000
Choom Holdings Inc.	Common Shares		Chris, Bogart	4	1/28/2019	10	0.438	3,499,750	25,000
Choom Holdings Inc.	Common Shares		Chris, Bogart	4	1/29/2019	10	0.4378	3,544,750	45,000
CIBT Education Group Inc.	Common Shares		Chu, Toby	4, 5	1/24/2019	10	0.65	6,025,347	20,000
CIBT Education Group Inc.	Common Shares		CIBT Education Group Inc	1	1/23/2019	10	0.6613	2,031,000	7,500
CIBT Education Group Inc.	Common Shares		CIBT Education Group Inc	1	1/24/2019	10	0.65	2,098,500	67,500
CIBT Education Group Inc.	Common Shares		CIBT Education Group Inc	1	1/25/2019	10	0.69	2,106,000	7,500
CIBT Education Group Inc.	Common Shares		CIBT Education Group Inc	1	1/28/2019	10	0.69	2,113,500	7,500
CIBT Education Group Inc.	Common Shares		CIBT Education Group Inc	1	1/29/2019	10	0.69	2,121,000	7,500
CIBT Education Group Inc.	Common Shares		CIBT Education Group Inc	1	1/30/2019	10	0.67	2,128,500	7,500
CIBT Education Group Inc.	Common Shares		Weir, Shane	4	1/24/2019	10	0.63	1,080,000	10,000
Cineplex Inc.	Deferred Share Units		Banks, Jordan	4	12/31/2018	30		13,965	649
Cineplex Inc.	Deferred Share Units		Bruce, Robert W.	4	12/31/2018	30		21,342	1,054
Cineplex Inc.	Performance Share Units		Campbell, Susan Linda Helen	5	12/31/2018	30		4,711	216
Cineplex Inc.	Restricted Share Units		Campbell, Susan Linda Helen	5	12/31/2018	30		725	37
Cineplex Inc.	Deferred Share Units		Dea, Joan	4	12/31/2018	30		16,976	844
Cineplex Inc.	Deferred Share Units		Fitzgerald, Anne Tunstall	5	12/31/2018	30		8,727	470
Cineplex Inc.	Performance Share Units		Fitzgerald, Anne Tunstall	5	12/31/2018	30		8,107	436
Cineplex Inc.	Restricted Share Units		Fitzgerald, Anne Tunstall	5	12/31/2018	30		970	49
Cineplex Inc.	Deferred Share Units		Fukakusa, Janice Rose	4	12/31/2018	30		6,528	218
Cineplex Inc.	Deferred Share Units		Greenberg, Ian	4	12/31/2018	30		25,818	1,212
Cineplex Inc.	Deferred Share Units		Hayes, Donna Marie	4	12/31/2018	30		6,469	238
Cineplex Inc.	Deferred Share Units		Jacob, Ellis	4, 5	12/31/2018	30		109,967	5,952
Cineplex Inc.	Performance Share Units		Jacob, Ellis	4, 5	12/31/2018	30		110,987	5,836
Cineplex Inc.	Restricted Share Units		Jacob, Ellis	4, 5	12/31/2018	30		10,867	552
Cineplex Inc.	Performance Share Units		Kennedy, Michael	5	12/31/2018	30		12,196	655
Cineplex Inc.	Restricted Share Units		Kennedy, Michael	5	12/31/2018	30		1,451	74
Cineplex Inc.	Performance Share Units		Mandryk, Suzanna	5	12/31/2018	30		7,087	381
Cineplex Inc.	Restricted Share Units		Mandryk, Suzanna	5	12/31/2018	30		880	45
Cineplex Inc.	Deferred Share Units		Marwah, Sarabjit	4	12/31/2018	30		23,224	1,157
Cineplex Inc.	Deferred Share Units		McGrath, Daniel F.	5	12/31/2018	30		8,667	673
Cineplex Inc.	Performance Share Units		McGrath, Daniel F.	5	12/31/2018	30		30,435	1,632
Cineplex Inc.	Restricted Share Units		McGrath, Daniel F.	5	12/31/2018	30		3,623	184
Cineplex Inc.	Deferred Share Units		Mohamed, Nadir	4	12/31/2018	30		5,962	193
Cineplex Inc.	Deferred Share Units		Nelson, Gordon	5	12/31/2018	30		9,302	596



**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/ Disposed
Cineplex Inc.	Performance Share Units	Nelson, Gordon	5	12/31/2018	30		20,566	1,103
Cineplex Inc.	Restricted Share Units	Nelson, Gordon	5	12/31/2018	30		2,453	125
Cineplex Inc.	Deferred Share Units	Nonis, Paul	5	12/31/2018	30		7	7
Cineplex Inc.	Performance Share Units	Nonis, Paul	5	12/31/2018	30		7,313	392
Cineplex Inc.	Restricted Share Units	Nonis, Paul	5	12/31/2018	30		978	50
Cineplex Inc.	Performance Share Units	Sautter, George	5	12/31/2018	30		6,824	356
Cineplex Inc.	Restricted Share Units	Sautter, George	5	12/31/2018	30		815	41
Cineplex Inc.	Deferred Share Units	Sonshine, Edward	4	12/31/2018	30		23,056	1,148
Cineplex Inc.	Performance Share Units	Stanghieri, Fabrizio	5	12/31/2018	30		7,109	381
Cineplex Inc.	Restricted Share Units	Stanghieri, Fabrizio	5	12/31/2018	30		978	50
Co-operators General Insurance Company	Preferred Shares Class A Series B	Daniel, Kevin	7	1/31/2019	30	100	1,768	1
Co-operators General Insurance Company	Preferred Shares Class A Series B	Daniel, Kevin	7	2/1/2019	30	100	1,784	16
Co-operators General Insurance Company	Preferred Shares Class A Series B	Guglietti, Lisa	5	2/1/2019	30	100	2,303	41
Co-operators General Insurance Company	Preferred Shares Class A Series B	Hanna, Paul	7	1/31/2019	30	100	979	1
Co-operators General Insurance Company	Preferred Shares Class A Series B	Hanna, Paul	7	2/1/2019	30	100	988	9
Co-operators General Insurance Company	Preferred Shares Class A Series B	McCombie, Richard Allen	7	1/31/2019	30	100	3,560	4
Co-operators General Insurance Company	Preferred Shares Class A Series B	McCombie, Richard Allen	7	2/1/2019	30	100	3,616	56
Co-operators General Insurance Company	Preferred Shares Class A Series B	Wesseling, Robert	4, 7, 5	2/1/2019	30	100	7,657	164
Cogeco Communications Inc.	Unité d'action différée/Deferred Share Unit	Abdoulah, Colleen	4	1/11/2019	00			
Cogeco Communications Inc.	Unité d'action différée/Deferred Share Unit	Abdoulah, Colleen	4	1/30/2019	56	65.85	1,209	1,209
Cogeco Communications Inc.	Unité d'action différée/Deferred Share Unit	Bell, Mary-Ann	4	1/30/2019	56	65.85	1,221	494
Cogeco Communications Inc.	Unité d'action différée/Deferred Share Unit	Cherry, James Charles	4	1/11/2019	00			
Cogeco Communications Inc.	Unité d'action différée/Deferred Share Unit	Cherry, James Charles	4	1/30/2019	56	65.85	1,177	1,177
Cogeco Communications Inc.	Unité d'action différée/Deferred Share Unit	Curadeau-Grou, Patricia	4	1/30/2019	56	65.85	12,139	1,823
Cogeco Communications Inc.	Unité d'action différée/Deferred Share Unit	Dunn, Philippa (Pippa)	4	1/11/2019	00			
Cogeco Communications Inc.	Unité d'action différée/Deferred Share Unit	Dunn, Philippa (Pippa)	4	1/30/2019	56	65.85	912	912
Cogeco Communications Inc.	Unité d'action différée/Deferred Share Unit	Ferstman, Joanne Shari	4	1/30/2019	56	65.85	6,568	2,051
Cogeco Communications Inc.	Unité d'action différée/Deferred Share Unit	Gibson, Lib	4	1/30/2019	56	65.85	1,406	547
Cogeco Communications Inc.	Unité d'action différée/Deferred Share Unit	Legault, Normand	7	1/30/2019	56	65.85	4,865	1,975
Cogeco Communications Inc.	Unité d'action différée/Deferred Share Unit	McAusland, David L.	4	1/30/2019	56	65.85	11,590	1,140

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Issuer Name		Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Cogeco Inc		Unité d'action différée/Deferred Share unit	Bell, Mary-Ann	4	1/30/2019	56	58.86	4,828	553
Cogeco Inc		Unité d'action différée/Deferred Share unit	Cherry, James Charles	4	1/30/2019	56	58.86	6,655	1,572
Cogeco Inc		Unité d'action différée/Deferred Share unit	Elhage, Samih	4	1/11/2019	00			
Cogeco Inc		Unité d'action différée/Deferred Share unit	Elhage, Samih	4	1/30/2019	56	58.86	816	816
Cogeco Inc		Unité d'action différée/Deferred Share unit	McAusland, David L.	4	1/30/2019	56	58.86	12,154	1,275
Colibri Corporation	Resource	Common Shares	McGavney, Ian	5	1/31/2019	10	0.045	324,000	10,000
Cominar Real Investment Trust	Estate	Trust Units	Bechard, Todd Patrick	5	12/31/2018	30	12.49	9,195	1,462
Cominar Real Investment Trust	Estate	Trust Units	Bechard, Todd Patrick	5	12/31/2018	35	12.63	9,420	225
Cominar Real Investment Trust	Estate	Trust Units	Boutin, Marie-Andrée	5	12/31/2018	30	12.01		203
Cominar Real Investment Trust	Estate	Trust Units	Boutin, Marie-Andrée	5	12/31/2018	30	12.01	203	203
Cominar Real Investment Trust	Estate	Trust Units	Commisso, Osvaldo	5	12/31/2018	30	12.49	21,090	1,978
Cominar Real Investment Trust	Estate	Trust Units	Commisso, Osvaldo	5	12/31/2018	35	12.59	21,911	821
Cominar Real Investment Trust	Estate	Trust Units	Cossette, Sylvain	4, 5	12/31/2018	30	12.41		7,900
Cominar Real Investment Trust	Estate	Trust Units	Cossette, Sylvain	4, 5	12/31/2018	30	12.41		7,901
Cominar Real Investment Trust	Estate	Trust Units	Cossette, Sylvain	4, 5	12/31/2018	30	12.41	32,143	7,901
Cominar Real Investment Trust	Estate	Trust Units	Cossette, Sylvain	4, 5	12/31/2018	35	12.55		1,806
Cominar Real Investment Trust	Estate	Trust Units	Cossette, Sylvain	4, 5	12/31/2018	35	12.55	33,950	1,807
Cominar Real Investment Trust	Estate	Trust Units	Dallaire, Alain	5	12/31/2018	30	12.43		4,911
Cominar Real Investment Trust	Estate	Trust Units	Dallaire, Alain	5	12/31/2018	30	12.43	121,975	4,912
Cominar Real Investment Trust	Estate	Trust Units	Dallaire, Alain	5	12/31/2018	35	12.6		2,658
Cominar Real Investment Trust	Estate	Trust Units	Dallaire, Alain	5	12/31/2018	35	12.6	124,633	2,658
Cominar Real Investment Trust	Estate	Trust Units	Deslauriers, Manon	5	12/31/2018	30	12.49	24,565	2,088
Cominar Real Investment Trust	Estate	Trust Units	Deslauriers, Manon	5	12/31/2018	35	12.53	24,964	399
Cominar Real Investment Trust	Estate	Trust Units	Hamel, Gilles	5	12/31/2018	30	12.49	72,881	4,693
Cominar Real Investment Trust	Estate	Trust Units	Hamel, Gilles	5	12/31/2018	35	12.56	74,139	1,258
Cominar Real Investment Trust	Estate	Trust Units	Laramée, Jean	5	12/31/2018	30	12.49	15,892	3,583
Cominar Real Investment Trust	Estate	Trust Units	Laramée, Jean	5	12/31/2018	35	12.54	16,619	727
Cominar Real Investment Trust	Estate	Trust Units	Pepin, Carl	5	12/31/2018	30	12.47	16,036	2,357
Cominar Real Investment Trust	Estate	Trust Units	Pepin, Carl	5	12/31/2018	35	12.69	17,058	1,022
Cominar Real Investment Trust	Estate	Trust Units	Racine, Michael	5	12/31/2018	30	12.49	20,566	2,033
Cominar Real Investment Trust	Estate	Trust Units	Racine, Michael	5	12/31/2018	35	12.6	21,752	1,186

**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Compass Corporation	Gold Common Shares	Phillips, Larry	4	1/31/2019	10	0.1275	940,900	196,150
Compass Corporation	Gold Common Shares	Pugliese, William	4	1/31/2019	10	0.1297	1,268,000	160,000
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Common Shares	Hsieh, Yu-Chung (Jim)	4, 5	10/26/2017	00			
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Common Shares	Hsieh, Yu-Chung (Jim)	4, 5	1/25/2019	22		945	945
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Common Shares	Hsieh, Yu-Chung (Jim)	4, 5	10/26/2017	00			
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Common Shares	Hsieh, Yu-Chung (Jim)	4, 5	1/25/2019	22		1,807,043	1,807,043
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Convertible Preferred Shares Series D Preferred Shares	Hsieh, Yu-Chung (Jim)	4, 5	10/26/2017	00			
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Convertible Preferred Shares Series D Preferred Shares	Hsieh, Yu-Chung (Jim)	4, 5	1/25/2019	22		207	207
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Convertible Preferred Shares Series D Preferred Shares	Hsieh, Yu-Chung (Jim)	4, 5	10/26/2017	00			
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Convertible Preferred Shares Series D Preferred Shares	Hsieh, Yu-Chung (Jim)	4, 5	1/25/2019	22		396,064	396,064
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Common Shares	Luquain, Serge	4, 7	1/24/2019	00			
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Common Shares	Luquain, Serge	4, 7	1/25/2019	22		945	945
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Common Shares	Luquain, Serge	4, 7	1/24/2019	00			
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Common Shares	Luquain, Serge	4, 7	1/25/2019	22		37,960,189	37,960,189
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Convertible Preferred Shares Series D Preferred Shares	Luquain, Serge	4, 7	1/24/2019	00			
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Convertible Preferred Shares Series D Preferred Shares	Luquain, Serge	4, 7	1/25/2019	22		207	207
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Convertible Preferred Shares Series D Preferred Shares	Luquain, Serge	4, 7	1/24/2019	00			
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Convertible Preferred Shares Series D Preferred Shares	Luquain, Serge	4, 7	1/25/2019	22		8,320,041	8,320,041
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Bonds Convertible Bonds Tranche B	Zhang, Sicheng	3, 4	11/25/2015	00			
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Bonds Convertible Bonds Tranche B	Zhang, Sicheng	3, 4	1/25/2019	22		\$31,915	\$31,915
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Common Shares	Zhang, Sicheng	3, 4	1/25/2019	37		5,800,000	-23,200,000
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Common Shares	Zhang, Sicheng	3, 4	1/25/2019	22		5,800,945	945
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Common Shares	Zhang, Sicheng	3, 4	11/25/2015	00			
Composite Group Inc. (formerly CanAsia Financial Inc.)	Alliance Common Shares	Zhang, Sicheng	3, 4	1/25/2019	22		41,904,117	41,904,117

**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Composite Alliance Group Inc. (formerly CanAsia Financial Inc.)	Convertible Preferred Shares Series D Preferred Shares	Zhang, Sicheng	3, 4	11/25/2015	00			
Composite Alliance Group Inc. (formerly CanAsia Financial Inc.)	Convertible Preferred Shares Series D Preferred Shares	Zhang, Sicheng	3, 4	1/25/2019	22		207	207
Composite Alliance Group Inc. (formerly CanAsia Financial Inc.)	Convertible Preferred Shares Series D Preferred Shares	Zhang, Sicheng	3, 4	11/25/2015	00			
Composite Alliance Group Inc. (formerly CanAsia Financial Inc.)	Convertible Preferred Shares Series D Preferred Shares	Zhang, Sicheng	3, 4	1/25/2019	22		9,184,464	9,184,464
Constantine Resources Ltd.	Metal Common Shares	Green, Darwin	5	1/23/2019	10	0.48	400,125	-100,000
Constantine Resources Ltd.	Metal Common Shares	Irwin, Brian Clarke	4	1/28/2019	10	0.49	562,500	-50,000
Constantine Resources Ltd.	Metal Common Shares	Morfopoulos, Aris	5	1/23/2019	10	0.48	17,500	-45,000
Constantine Resources Ltd.	Metal Common Shares	Morfopoulos, Aris	5	1/31/2019	10	0.5	15,000	-2,500
Copper Mountain Mining Corporation	Options	Strickland, Donald	5	1/28/2019	00			
Copper Mountain Mining Corporation	Options	Strickland, Donald	5	1/28/2019	00			
Copper Mountain Mining Corporation	Options	Strickland, Donald	5	1/28/2019	00		361,800	
COPPER REEF MINING CORPORATION	Common Shares	Masson, Stephen Leo	3	1/30/2019	10	0.02	3,380,016	10,000
CORAL GOLD RESOURCES LTD.	Common Shares	Andrews, Ronald D.	4	1/31/2019	51	0.24	619,500	100,000
CORAL GOLD RESOURCES LTD.	Options	Andrews, Ronald D.	4	1/31/2019	51	0.24	300,000	-100,000
Coro Mining Corp.	Options	Rivera, Sergio	5	1/3/2019	52		1,500,000	-400,000
Coronado Resources Ltd.	Warrants	Guidi, Alex P.	3	1/18/2019	55		0	-600,000
Corridor Resources Inc.	Common Shares	Hachey, Lisette France	5	1/24/2019	10	0.78	41,489	-500
Corridor Resources Inc.	Common Shares	Hachey, Lisette France	5	1/28/2019	10	0.78	39,489	-2,000
Cotinga Pharmaceuticals Inc. (formerly, Critical Outcome Technologies Inc.)	Common Shares	Drake, John C.	3, 5	1/29/2019	10	2.41	588,957	241,000
Crest Resources Inc.	Common Shares	Reynolds, Christopher	6	1/31/2019	10	0.1	2,233,000	300,000
Critical Control Energy Services Corp.	Common Shares	2209021 Ontario Inc.	3	1/24/2019	00			
Critical Control Energy Services Corp.	Common Shares	2209021 Ontario Inc.	3	1/24/2019	00		6,087,182	
Critical Control Energy Services Corp.	Common Shares	2209021 Ontario Inc.	3	1/28/2019	10	0.08	9,552,182	3,465,000
Critical Control Energy Services Corp.	Preferred Series A Shares	2209021 Ontario Inc.	3	1/24/2019	00		14,000	
Critical Control Energy Services Corp.	Common Shares	Boeckh Investments Inc.	3	1/28/2019	10	0.08	7,409,000	-182,850
Crown Capital Partners Inc.	Common Shares	Crown Capital Partners Inc.	1	1/31/2019	10	9.8858	1,200	1,200
Crown Mining Corp.	Common Shares	Dunn, Stephen Ronald	4	1/28/2019	10	0.085	4,774,600	35,000
Cryptanite Blockchain Technologies Corp. (formerly, Westbay Ventures Inc.)	Common Shares	Eagleton, John	3, 4, 5	1/31/2019	10	0.0357	9,034,755	20,000
Currency Exchange International, Corp.	Common Shares	Mickleborough, Mark Douglas	4	1/25/2019	10	26.93	4,520	220
Cypress Development Corp.	Common Shares	Chow, Amanda	4	1/29/2019	51	0.08	70,000	70,000
Cypress Development Corp.	Options	Chow, Amanda	4	1/29/2019	51	0.08	466,000	-70,000

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Issuer Name		Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Cypress Corp.	Development	Common Shares	Huston, Donald Carl	4, 5	1/29/2019	51	0.08	334,559	130,000
Cypress Corp.	Development	Options	Huston, Donald Carl	4, 5	1/29/2019	51	0.08	842,500	-130,000
Cypress Corp.	Development	Common Shares	Myers, Donald George	4	1/29/2019	51	0.08	120,000	120,000
Cypress Corp.	Development	Options	Myers, Donald George	4	1/29/2019	51	0.08	742,500	-120,000
Cypress Corp.	Development	Common Shares	PETTIT, JAMES, GAYDON	5	1/31/2019	51	0.08	234,600	130,000
Cypress Corp.	Development	Options	PETTIT, JAMES, GAYDON	5	1/31/2019	51	0.08	773,000	-130,000
Cypress Corp.	Development	Common Shares	WILLOUGHBY, WILLIAM WESLEY	4	1/30/2019	46	0.165	331,241	74,410
Datable Technology Corporation (formerly 3TL Technologies Corp.)	Technology	Options	Craig, Rob	4, 5	12/22/2017	50		80,000	-200,000
Datable Technology Corporation (formerly 3TL Technologies Corp.)	Technology	Options	Craig, Rob	4, 5	12/22/2017	50		280,000	200,000
Datable Technology Corporation (formerly 3TL Technologies Corp.)	Technology	Options	Craig, Rob	4, 5	12/22/2017	38		200,000	-80,000
Datable Technology Corporation (formerly 3TL Technologies Corp.)	Technology	Options	Craig, Rob	4, 5	12/22/2017	50		280,000	80,000
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	AI Limited	Common Shares	Frank, Michael	5	1/25/2019	16	0.05	3,474,347	1,000,000
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	AI Limited	Warrants	Frank, Michael	5	1/25/2019	16	0.05	1,666,500	1,000,000
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	AI Limited	Common Shares	Kang, Byungjoo (Steve)	5	1/25/2019	16	1E+06	3,220,000	1,200,000
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	AI Limited	Warrants	Kang, Byungjoo (Steve)	5	1/25/2019	16	0.05	2,180,000	1,200,000
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	AI Limited	Common Shares	Ryu, Andrew Jong Soo	3, 4, 7, 5	1/25/2019	16	0.05	14,601,000	5,300,000
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	AI Limited	Common Shares	Ryu, Andrew Jong Soo	3, 4, 7, 5	1/25/2019	16	0.05	5,200,000	700,000
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	AI Limited	Warrants	Ryu, Andrew Jong Soo	3, 4, 7, 5	1/25/2019	16	0.05	8,900,000	5,300,000
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	AI Limited	Warrants	Ryu, Andrew Jong Soo	3, 4, 7, 5	6/8/2017	00			
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	AI Limited	Warrants	Ryu, Andrew Jong Soo	3, 4, 7, 5	1/25/2019	16	0.05	700,000	700,000
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	AI Limited	Common Shares	Stevens, Jeff	5	6/7/2017	00			
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	AI Limited	Common Shares	Stevens, Jeff	5	1/25/2019	16	0.05	1,000,000	1,000,000
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	AI Limited	Common Shares	Stevens, Jeff	5	1/25/2019	16	0.05	2,840,000	400,000
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	AI Limited	Common Shares	Stevens, Jeff	5	1/25/2019	16	0.05	2,200,000	1,000,000
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	AI Limited	Warrants	Stevens, Jeff	5	6/7/2017	00			

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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/ Disposed
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	Warrants	Stevens, Jeff	5	1/25/2019	16	0.05	1,000,000	1,000,000
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	Warrants	Stevens, Jeff	5	6/7/2017	00			
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	Warrants	Stevens, Jeff	5	1/25/2019	16	0.05	400,000	400,000
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	Warrants	Stevens, Jeff	5	1/25/2019	16	0.05	1,460,000	1,000,000
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	Common Shares	Stone, Richard Gerald	4	1/7/2019	00			
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	Common Shares	Stone, Richard Gerald	4	1/25/2019	16	0.05	200,000	200,000
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	Warrants	Stone, Richard Gerald	4	1/7/2019	00			
DataMetrex AI Limited (previously, Everfront Ventures Corp.)	Warrants	Stone, Richard Gerald	4	1/25/2019	16	0.05	200,000	200,000
DHX Media Ltd.	Equity Swap - Long Position (1,000,000 common shares - expires April 24, 2019)	EastBay Asset Management, LLC	3	10/24/2017	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (1,000,000 common shares - expires April 24, 2019)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (1,000,000 common shares - expires January 30, 2020)	EastBay Asset Management, LLC	3	10/23/2017	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (1,000,000 common shares - expires January 30, 2020)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (100,000 common shares - expires November 2, 2020)(12/10/18)	EastBay Asset Management, LLC	3	12/10/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (100,000 common shares - expires November 2, 2020)(12/10/18)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (100,000 common shares - expires November 3, 2027)(12/18/18)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (100,000 common shares - expires November 3, 2027)(12/18/18)	EastBay Asset Management, LLC	3	12/18/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (100,000 common shares - expires November 6, 2020)(12/10/18)	EastBay Asset Management, LLC	3	12/10/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (100,000 common shares - expires November 6, 2020)(12/10/18)	EastBay Asset Management, LLC	3	12/18/2018	00			

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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/ Disposed
DHX Media Ltd.	Equity Swap - Long Position (100,000 common shares - expires November 6, 2020)(12/17/18)	EastBay Asset Management, LLC	3	12/17/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (100,000 common shares - expires November 6, 2020)(12/17/18)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (100,000 common shares - expires June 10, 2022)	EastBay Asset Management, LLC	3	12/11/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (100,000 common shares - expires June 10, 2022)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (110,000 common shares - expires November 6, 2020)(12/04/18)	EastBay Asset Management, LLC	3	12/4/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (110,000 common shares - expires November 6, 2020)(12/04/18)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (12,300 common shares - expires November 2, 2020)	EastBay Asset Management, LLC	3	11/1/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (12,300 common shares - expires November 2, 2020)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (120,000 common shares - expires November 6, 2020)	EastBay Asset Management, LLC	3	10/23/2017	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (120,000 common shares - expires November 6, 2020)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (133,409 common shares - expires November 19, 2020)	EastBay Asset Management, LLC	3	11/21/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (133,409 common shares - expires November 19, 2020)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (150,000 common shares - expires November 6, 2020)	EastBay Asset Management, LLC	3	10/24/2017	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (150,000 common shares - expires November 6, 2020)	EastBay Asset Management, LLC	3	12/18/2018	00			

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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
DHX Media Ltd.	Equity Swap - Long Position (150,000 common shares - expires November 6, 2020)(10/26/17)	EastBay Asset Management, LLC	3	10/26/2017	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (150,000 common shares - expires November 6, 2020)(10/26/17)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (150,000 common shares - expires November 6, 2020)(10/27/17)	EastBay Asset Management, LLC	3	10/27/2017	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (150,000 common shares - expires November 6, 2020)(10/27/17)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (150,000 common shares - expires November 6, 2020)(10/30/17)	EastBay Asset Management, LLC	3	10/30/2017	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (150,000 common shares - expires November 6, 2020)(10/30/17)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (150,000 common shares - expires November 6, 2020)(12/04/18)	EastBay Asset Management, LLC	3	12/4/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (150,000 common shares - expires November 6, 2020)(12/04/18)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (180,000 common shares - expires November 6, 2020)	EastBay Asset Management, LLC	3	10/25/2017	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (180,000 common shares - expires November 6, 2020)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (180,700 common shares - expires November 2, 2020)(11/02/18)	EastBay Asset Management, LLC	3	11/2/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (180,700 common shares - expires November 2, 2020)(11/02/18)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (184,000 common shares - expires November 3, 2027)(10/31/17)	EastBay Asset Management, LLC	3	10/31/2017	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (184,000 common shares - expires November 3, 2027)(10/31/17)	EastBay Asset Management, LLC	3	12/18/2018	00			



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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/ Disposed
DHX Media Ltd.	Equity Swap - Long Position (19,400 common shares - expires November 19, 2020)	EastBay Asset Management, LLC	3	11/19/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (19,400 common shares - expires November 19, 2020)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (200,000 common shares - expires November 2, 2020)(11/01/18)	EastBay Asset Management, LLC	3	11/1/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (200,000 common shares - expires November 2, 2020)(11/01/18)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (200,000 common shares - expires November 3, 2027)(12/11/18)	EastBay Asset Management, LLC	3	12/11/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (200,000 common shares - expires November 3, 2027)(12/11/18)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (200,000 common shares - expires November 6, 2020)(11/27/18)	EastBay Asset Management, LLC	3	11/27/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (200,000 common shares - expires November 6, 2020)(11/27/18)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (250,000 common shares - expires November 6, 2020)(12/07/18)	EastBay Asset Management, LLC	3	12/7/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (250,000 common shares - expires November 6, 2020)(12/07/18)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (250,000 common shares - expires October 31, 2019)	EastBay Asset Management, LLC	3	10/24/2017	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (250,000 common shares - expires October 31, 2019)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (300,000 common shares - expires November 6, 2020)(11/30/18)	EastBay Asset Management, LLC	3	11/30/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (300,000 common shares - expires November 6, 2020)(11/30/18)	EastBay Asset Management, LLC	3	12/18/2018	00			

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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
DHX Media Ltd.	Equity Swap - Long Position (300,000 common shares - expires November 6, 2020)(12/11/18)	EastBay Asset Management, LLC	3	12/11/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (300,000 common shares - expires November 6, 2020)(12/11/18)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (300,000 common shares - expires October 31, 2019)	EastBay Asset Management, LLC	3	10/23/2017	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (300,000 common shares - expires October 31, 2019)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (322,412 common shares - expires May 26, 2020)	EastBay Asset Management, LLC	3	11/26/2018	70			1
DHX Media Ltd.	Equity Swap - Long Position (322,412 common shares - expires May 26, 2020)	EastBay Asset Management, LLC	3	11/26/2018	70			1
DHX Media Ltd.	Equity Swap - Long Position (322,412 common shares - expires May 26, 2020)	EastBay Asset Management, LLC	3	11/26/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (322,412 common shares - expires May 26, 2020)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (34,600 common shares - expires November 19, 2020)	EastBay Asset Management, LLC	3	11/20/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (34,600 common shares - expires November 19, 2020)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (35,500 common shares - expires January 30, 2020) (10/20/17)	EastBay Asset Management, LLC	3	10/20/2017	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (35,500 common shares - expires January 30, 2020) (10/20/17)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (350,000 common shares - expires November 6, 2020)(11/28/18)	EastBay Asset Management, LLC	3	11/28/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (350,000 common shares - expires November 6, 2020)(11/28/18)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (350,000 common shares - expires November 6, 2020)(12/06/18)	EastBay Asset Management, LLC	3	12/6/2018	70		1	1

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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
DHX Media Ltd.	Equity Swap - Long Position (350,000 common shares - expires November 6, 2020)(12/06/18)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (360,000 common shares - expires November 6, 2020)(11/29/18)	EastBay Asset Management, LLC	3	11/29/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (360,000 common shares - expires November 6, 2020)(11/29/18)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (400,000 common shares - expires November 6, 2020)(12/03/18)	EastBay Asset Management, LLC	3	12/3/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (400,000 common shares - expires November 6, 2020)(12/03/18)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (50,000 common shares - expires June 10, 2022)	EastBay Asset Management, LLC	3	12/17/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (50,000 common shares - expires June 10, 2022)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (6,600 common shares - expires November 19, 2020)	EastBay Asset Management, LLC	3	12/10/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (6,600 common shares - expires November 19, 2020)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (61,200 common shares - expires November 2, 2020)(11/06/18)	EastBay Asset Management, LLC	3	11/6/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (61,200 common shares - expires November 2, 2020)(11/06/18)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (66,300 common shares - expires November 6, 2020)(12/07/18)	EastBay Asset Management, LLC	3	12/7/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (66,300 common shares - expires November 6, 2020)(12/07/18)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (68,400 common shares - expires November 2, 2020)(11/05/18)	EastBay Asset Management, LLC	3	11/5/2018	70		1	1

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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
DHX Media Ltd.	Equity Swap - Long Position (68,400 common shares - expires November 2, 2020)(11/05/18)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (698,900 common shares - expires October 31, 2019)	EastBay Asset Management, LLC	3	10/20/2017	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (698,900 common shares - expires October 31, 2019)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (75,000 common shares - expires November 3, 2027)(12/17/18)	EastBay Asset Management, LLC	3	12/17/2018	70			1
DHX Media Ltd.	Equity Swap - Long Position (75,000 common shares - expires November 3, 2027)(12/17/18)	EastBay Asset Management, LLC	3	12/17/2018	70			1
DHX Media Ltd.	Equity Swap - Long Position (75,000 common shares - expires November 3, 2027)(12/17/18)	EastBay Asset Management, LLC	3	12/17/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (75,000 common shares - expires November 3, 2027)(12/17/18)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (85,000 common shares - expires November 6, 2020)(12/10/18)	EastBay Asset Management, LLC	3	12/10/2018	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (85,000 common shares - expires November 6, 2020)(12/10/18)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Equity Swap - Long Position (950,000 common shares - expires October 31, 2019)	EastBay Asset Management, LLC	3	10/25/2017	70		1	1
DHX Media Ltd.	Equity Swap - Long Position (950,000 common shares - expires October 31, 2019)	EastBay Asset Management, LLC	3	12/18/2018	00			
DHX Media Ltd.	Variable Shares	Voting EastBay Asset Management, LLC	3	12/18/2018	00		3,650,306	
DHX Media Ltd.	Variable Shares	Voting EastBay Asset Management, LLC	3	12/20/2018	10	1.68	3,679,906	29,600
DHX Media Ltd.	Variable Shares	Voting EastBay Asset Management, LLC	3	12/18/2018	00		17,529,705	
DHX Media Ltd.	Variable Shares	Voting EastBay Asset Management, LLC	3	12/21/2018	10	1.79	17,608,421	78,716
DHX Media Ltd.	Variable Shares	Voting EastBay Asset Management, LLC	3	12/21/2018	10	1.81	17,708,421	100,000
DHX Media Ltd.	Variable Shares	Voting EastBay Asset Management, LLC	3	12/24/2018	10	1.71	17,808,421	100,000
DHX Media Ltd.	Variable Shares	Voting EastBay Asset Management, LLC	3	12/28/2018	10	1.65	17,908,421	100,000
DHX Media Ltd.	Variable Shares	Voting EastBay Asset Management, LLC	3	1/7/2019	10	1.84		100,000

**Insider Reporting**

Issuer Name	Security		Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
DHX Media Ltd.	Variable Shares	Voting	EastBay Asset Management, LLC	3	1/7/2019	10	1.84		100,000
DHX Media Ltd.	Variable Shares	Voting	EastBay Asset Management, LLC	3	1/7/2019	10	1.84	18,008,421	100,000
DHX Media Ltd.	Variable Shares	Voting	EastBay Asset Management, LLC	3	1/8/2019	10	1.84	18,108,421	100,000
DHX Media Ltd.	Variable Shares	Voting	EastBay Asset Management, LLC	3	1/9/2019	10	1.84	18,142,321	33,900
DHX Media Ltd.	Variable Shares	Voting	EastBay Asset Management, LLC	3	12/18/2018	00		3,169,316	
DHX Media Ltd.	Variable Shares	Voting	EastBay Asset Management, LLC	3	12/21/2018	10	1.79	3,190,600	21,284
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/18/2018	00			
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/18/2018	00			
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/20/2018	90	3.32		-29,600
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/20/2018	90	1.68		-29,600
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/20/2018	90	1.68		-29,600
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/21/2018	10	3.31		78,716
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/21/2018	10	1.79		78,716
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/21/2018	10	1.79		78,716
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/21/2018	10	3.34		100,000
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/21/2018	10	1.81		100,000
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/21/2018	10	1.81		100,000
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/24/2018	10	3.15		100,000
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/24/2018	10	1.71		100,000
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/24/2018	10	1.71		100,000
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/28/2018	10	3.08		100,000
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/28/2018	10	1.65		100,000
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/28/2018	10	1.65		100,000
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	1/7/2019	10	1.84		100,000
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	1/7/2019	10	1.84		100,000
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	1/8/2019	10	1.84		100,000
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	1/8/2019	10	1.84		100,000
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	1/9/2019	10	1.84		33,900
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	1/9/2019	10	1.84		33,900
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/18/2018	00			
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/18/2018	00			
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/20/2018	90	3.32		29,600
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/20/2018	90	1.68		29,600

**Insider Reporting**

Issuer Name	Security		Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/ Disposed
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/20/2018	90	1.68		29,600
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/18/2018	00			
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/18/2018	00			
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/21/2018	10	3.31		21,284
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/21/2018	10	1.79		21,284
DHX Media Ltd.	Variable Shares	Voting	Landry, Steve Michael	4	12/21/2018	10	1.79		21,284
Diagnos Inc.	Options		Chakor Djelthia, Hadi	5	1/28/2019	50	0.05	550,000	60,000
Diagnos Inc.	Options		Hébert, Georges	4	1/28/2019	50	0.05	2,100,000	600,000
Diagnos Inc.	Options		Larente, André	4, 5	1/28/2019	50	0.05	4,037,684	600,000
Diagnos Inc.	Options		MacLellan, Reid	4	1/28/2019	50	0.05	1,000,000	500,000
Diagnos Inc.	Options		Massue, Marc-André	5	1/28/2019	50	0.05	1,500,000	300,000
Diagnos Inc.	Options		Moreno Robles, Guillermo	5	1/28/2019	50	0.05	585,000	60,000
Diagnos Inc.	Options		Yale, Jean-Francois	4	1/28/2019	00			
Diagnos Inc.	Options		Yale, Jean-Francois	4	1/28/2019	50	0.05	500,000	500,000
DionyMed Brands Inc. (formerly Sixonine Ventures Corp.)	Options		Moyer, Brett Allen	4	11/27/2018	00		600,000	
Diversified Royalty Corp.	Common Shares		Gutmanis, Greg	5	12/31/2018	30		8,252	579
Diversified Royalty Corp.	Common Shares		Gutmanis, Greg	5	12/31/2018	30		66,770	207
Diversified Royalty Corp.	Common Shares		Gutmanis, Greg	5	12/31/2018	30		10,726	758
Drone Delivery Canada Corp. (formerly Asher Resources Corporation)	Common Shares		Buzbuzian, Richard	3, 4, 5	1/28/2019	51		1,418,583	60,000
Drone Delivery Canada Corp. (formerly Asher Resources Corporation)	Options		Buzbuzian, Richard	3, 4, 5	1/28/2019	51		1,891,250	-60,000
Dundee Precious Metals Inc.	Common Shares		GMT Capital Corp	3	1/28/2019	10	2.87	5,385,190	19,900
Dundee Precious Metals Inc.	Common Shares		GMT Capital Corp	3	1/29/2019	10	2.94	5,387,890	2,700
Dundee Precious Metals Inc.	Common Shares		GMT Capital Corp	3	1/28/2019	10	2.87	6,870,370	26,400
Dundee Precious Metals Inc.	Common Shares		GMT Capital Corp	3	1/29/2019	10	2.94	6,873,970	3,600
Dundee Precious Metals Inc.	Common Shares		GMT Capital Corp	3	1/28/2019	10	2.87	10,190,900	40,200
Dundee Precious Metals Inc.	Common Shares		GMT Capital Corp	3	1/29/2019	10	2.94	10,196,400	5,500
Dundee Precious Metals Inc.	Common Shares		GMT Capital Corp	3	1/28/2019	10	2.87	283,880	700
Dundee Precious Metals Inc.	Common Shares		GMT Capital Corp	3	1/29/2019	10	2.94	283,980	100
Dundee Precious Metals Inc.	Common Shares		GMT Capital Corp	3	1/28/2019	10	2.87	1,066,400	4,200
Dundee Precious Metals Inc.	Common Shares		GMT Capital Corp	3	1/29/2019	10	2.94	1,067,000	600
DXI Energy Inc.	Options		Matheson, David Norman	5	1/25/2019	50	0.06	3,900,000	3,500,000
dynaCERT Inc. (formerly Dynamic Fuel Systems Inc.)	Common Shares		Hoffman, Raymond Wayne	4	2/1/2019	47	0.32	6,772,200	-200,000
E Split Corp.	Common Class A	Shares	Brasseur, Jeremy	6	1/25/2019	10	13.5	20,000	10,000
E Split Corp.	Common Class A	Shares	Brasseur, Jeremy	6	1/30/2019	10	13.5	20,300	300
East Coast Investment Grade Income Fund	Units		Arrow Capital Management Inc.	7	1/29/2019	10	9.3	0	-1,900

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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
East Coast Investment Grade Income Fund	Units	Arrow Capital Management Inc.	7	1/29/2019	10	9.3	0	-700
Eastmain Inc.	Resources	Common Shares	Fazzini, Joseph	5	9/18/2018	57	0.18	74,925
Eastmain Inc.	Resources	Common Shares	Fazzini, Joseph	5	9/18/2018	57	0.18	510,166
Eastmain Inc.	Resources	Common Shares	Fazzini, Joseph	5	1/28/2019	57	0.15	742,819
Eastmain Inc.	Resources	Options	Fazzini, Joseph	5	1/28/2019	50	0.15	777,556
Eastmain Inc.	Resources	Restricted Share Units (Time-based)	Fazzini, Joseph	5	9/18/2018	57	0.18	-74,925
Eastmain Inc.	Resources	Restricted Share Units (Time-based)	Fazzini, Joseph	5	9/18/2018	57	0.18	183,334
Eastmain Inc.	Resources	Restricted Share Units (Time-based)	Fazzini, Joseph	5	1/28/2019	56		415,987
Eastmain Inc.	Resources	Restricted Share Units (Time-based)	Fazzini, Joseph	5	1/28/2019	57	0.15	183,334
Eastmain Inc.	Resources	Common Shares	Lemasson, Claude	4, 5	9/18/2018	57	0.18	108,225
Eastmain Inc.	Resources	Common Shares	Lemasson, Claude	4, 5	9/18/2018	57	0.18	2,433,333
Eastmain Inc.	Resources	Common Shares	Lemasson, Claude	4, 5	1/28/2019	57	0.15	2,932,126
Eastmain Inc.	Resources	Options	Lemasson, Claude	4, 5	1/28/2019	50	0.15	1,337,935
Eastmain Inc.	Resources	Restricted Share Units (Time-based)	Lemasson, Claude	4, 5	9/18/2018	57	0.18	-108,225
Eastmain Inc.	Resources	Restricted Share Units (Time-based)	Lemasson, Claude	4, 5	9/18/2018	57	0.18	275,001
Eastmain Inc.	Resources	Restricted Share Units (Time-based)	Lemasson, Claude	4, 5	1/28/2019	56		613,794
Eastmain Inc.	Resources	Restricted Share Units (Time-based)	Lemasson, Claude	4, 5	1/28/2019	57	0.15	275,001
Eastmain Inc.	Resources	Common Shares	McGuinty, William John	5	1/28/2019	57	0.15	359,545
Eastmain Inc.	Resources	Options	McGuinty, William John	5	1/28/2019	50	0.15	421,515
Eastmain Inc.	Resources	Restricted Share Units (Time-based)	McGuinty, William John	5	1/28/2019	56		199,549
Eastmain Inc.	Resources	Restricted Share Units (Time-based)	McGuinty, William John	5	1/28/2019	57	0.15	105,002
eCobalt Solutions Inc.	Common Shares	Rabideau, Monique Therese	4	4/10/2018	00			
eCobalt Solutions Inc.	Common Shares	Rabideau, Monique Therese	4	1/9/2019	10	0.58	13,000	13,000
eCobalt Solutions Inc.	Common Shares	Rabideau, Monique Therese	4	1/11/2019	10	0.55	30,000	17,000
Eguana Technologies Inc.	Options	Pollard, Gregory Ian	5	1/31/2019	52	0.2	833,333	-66,667
Eloro Resources Ltd.	Common Shares	Berka, Dusan	4	1/30/2019	16	0.4	264,664	12,500
Eloro Resources Ltd.	Warrants	Berka, Dusan	4	1/30/2019	16	0.4	6,250	6,250
Emblem Corp. (formerly Saber Capital Corp.)	Common Shares	GRIMALDI, LORETO	4	11/6/2018	00		10,000	
Emera Incorporated	Common Shares	Janega, Richard	5	1/22/2019	51	21.99	11,319	3,000
Emera Incorporated	Options	Janega, Richard	5	1/22/2019	51	21.99	138,300	-3,000
Empire Industries Ltd.	Options	Chang, Li-Ting (Jack)	4	1/25/2019	51			-75,000
Empire Industries Ltd.	Options	Chang, Li-Ting (Jack)	4	1/25/2019	51			-75,000
Empire Industries Ltd.	Options	Chang, Li-Ting (Jack)	4	1/25/2019	52		0	-75,000
Empire Industries Ltd.	Options	Francis, Allan Ross	5	1/25/2019	52		140,000	-150,000
Empire Industries Ltd.	Options	Macdonald, Ian Mor	4	1/25/2019	52		187,500	-75,000
Empire Industries Ltd.	Options	Marshall, Robert Glenn	4	1/25/2019	52		87,500	-75,000
Empire Industries Ltd.	Options	Zhou, Ye	7	1/25/2019	52		176,250	-163,750
Endeavour Mining Corporation	Common Shares	Carroll, Morgan Denis	5	1/25/2019	10	21.95	106,633	-14,000

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Issuer Name		Security		Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Endeavour Corporation	Mining	Common Shares		de Joux, Henri	5	1/28/2019	10	22.1	19,779	-12,000
Endeavour Corporation	Mining	Performance Units	Share	de Joux, Henri	5	1/30/2017	56			100,000
Endeavour Corporation	Mining	Performance Units	Share	de Joux, Henri	5	1/30/2017	56		100,021	71,004
Endeavour Corporation	Mining	Performance Units	Share	de Sébastien	Montessus, 4, 5	10/8/2016	56			332,500
Endeavour Corporation	Mining	Performance Units	Share	de Sébastien	Montessus, 4, 5	10/8/2016	56		261,833	219,283
Endeavour Corporation	Mining	Performance Units	Share	de Sébastien	Montessus, 4, 5	1/30/2017	56			380,000
Endeavour Corporation	Mining	Performance Units	Share	de Sébastien	Montessus, 4, 5	1/30/2017	56		689,579	269,813
Endeavour Corporation	Mining	Performance Units	Share	de Sébastien	Montessus, 4, 5	2/12/2018	56			475,000
Endeavour Corporation	Mining	Performance Units	Share	de Sébastien	Montessus, 4, 5	2/12/2018	56		955,415	265,836
Endeavour Corporation	Mining	Performance Units	Share	de Sébastien	Montessus, 4, 5	12/5/2018	57			-157,934
Endeavour Corporation	Mining	Performance Units	Share	de Sébastien	Montessus, 4, 5	12/5/2018	57			-157,933
Endeavour Corporation	Mining	Performance Units	Share	de Sébastien	Montessus, 4, 5	12/5/2018	57		797,482	-157,933
Endeavour Corporation	Mining	Performance Units	Share	de Sébastien	Montessus, 4, 5	1/16/2019	57			-332,500
Endeavour Corporation	Mining	Performance Units	Share	de Sébastien	Montessus, 4, 5	1/16/2019	57		578,199	-219,283
Energy Fuels Inc.		Common Shares		Bovaird, James Birks	4	1/27/2019	36	2.92	95,403	42,763
Energy Fuels Inc.		Common Shares		Bovaird, James Birks	4	2/1/2019	10	2.872	79,295	-16,108
Energy Fuels Inc.		Rights Restricted Stock Units		Bovaird, James Birks	4	1/27/2019	36	2.92	62,285	-42,763
Energy Fuels Inc.		Common Shares		Carroll, Paul Aylward	4	1/27/2019	36	2.92	68,229	35,635
Energy Fuels Inc.		Common Shares		Carroll, Paul Aylward	4	2/1/2019	10	2.872	56,234	-11,995
Energy Fuels Inc.		Rights Restricted Stock Units		Carroll, Paul Aylward	4	1/27/2019	36	2.92	49,896	-35,635
Energy Fuels Inc.		Common Shares		Chalmers, Stephen	Mark 5	1/27/2019	36	2.92	176,709	115,963
Energy Fuels Inc.		Common Shares		Chalmers, Stephen	Mark 5	2/1/2019	10	2.872	122,976	-53,733
Energy Fuels Inc.		Rights Restricted Stock Units		Chalmers, Stephen	Mark 5	1/27/2019	36	2.92	285,035	-115,963
Energy Fuels Inc.		Common Shares		Eshleman, Benjamin	4	1/27/2019	36	2.92		30,481
Energy Fuels Inc.		Common Shares		Eshleman, Benjamin	4	1/27/2019	36	2.92	32,993	29,493
Energy Fuels Inc.		Rights Restricted Stock Units		Eshleman, Benjamin	4	1/27/2019	36	2.92		-30,481
Energy Fuels Inc.		Rights Restricted Stock Units		Eshleman, Benjamin	4	1/27/2019	36	2.92	52,597	-29,493
Energy Fuels Inc.		Common Shares		Filas, Barbara Appelin	4	3/12/2018	00			
Energy Fuels Inc.		Common Shares		Filas, Barbara Appelin	4	1/27/2019	36	2.92	14,647	14,647
Energy Fuels Inc.		Rights Restricted Stock Units		Filas, Barbara Appelin	4	1/27/2019	36	2.92	39,761	-14,647
Energy Fuels Inc.		Common Shares		Frydenlund, David C.	5	1/27/2019	36	2.92	203,052	106,885
Energy Fuels Inc.		Common Shares		Frydenlund, David C.	5	2/1/2019	10	2.872	153,287	-49,765
Energy Fuels Inc.		Rights Restricted Stock Units		Frydenlund, David C.	5	1/27/2019	36	2.92	196,972	-106,885
Energy Fuels Inc.		Common Shares		Goranson, William Paul	5	1/27/2019	36	2.92	200,431	103,488
Energy Fuels Inc.		Common Shares		Goranson, William Paul	5	2/1/2019	10	2.872	153,211	-47,220
Energy Fuels Inc.		Rights Restricted Stock Units		Goranson, William Paul	5	1/27/2019	36	2.92	193,575	-103,488
Energy Fuels Inc.		Common Shares		Hansen, Bruce Douglas	4	1/27/2019	36	2.92	102,935	40,029
Energy Fuels Inc.		Rights Restricted Stock Units		Hansen, Bruce Douglas	4	1/27/2019	36	2.92	58,087	-40,029
Energy Fuels Inc.		Common Shares		Higgs, Dennis	4	1/27/2019	36	2.92		32,903



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Energy Fuels Inc.	Common Shares	Higgs, Dennis	4	1/27/2019	36	2.92	298,467	32,902
Energy Fuels Inc.	Common Shares	Higgs, Dennis	4	2/1/2019	10	2.872	287,021	-11,446
Energy Fuels Inc.	Rights Restricted Stock Units	Higgs, Dennis	4	1/27/2019	36			-32,903
Energy Fuels Inc.	Rights Restricted Stock Units	Higgs, Dennis	4	1/27/2019	36		47,753	-32,902
Energy Fuels Inc.	Common Shares	Kirkwood, William	Robert	4	1/27/2019	36	2.92	31,068
Energy Fuels Inc.	Common Shares	Kirkwood, William	Robert	4	1/27/2019	36	2.92	212,640
Energy Fuels Inc.	Rights Restricted Stock Units	Kirkwood, William	Robert	4	1/27/2019	36	2.92	-31,068
Energy Fuels Inc.	Rights Restricted Stock Units	Kirkwood, William	Robert	4	1/27/2019	36	2.92	57,170
Energy Fuels Inc.	Common Shares	Moore, Curtis		5	1/27/2019	36	2.92	68,704
Energy Fuels Inc.	Common Shares	Moore, Curtis		5	2/1/2019	10	2.872	50,297
Energy Fuels Inc.	Rights Restricted Stock Units	Moore, Curtis		5	1/27/2019	36	2.92	54,598
Energy Fuels Inc.	Common Shares	Tarnowski, John	Matthew	5	1/27/2019	36	2.92	38,337
Energy Fuels Inc.	Common Shares	Tarnowski, John	Matthew	5	2/1/2019	10	2.872	26,582
Energy Fuels Inc.	Rights Restricted Stock Units	Tarnowski, John	Matthew	5	1/27/2019	36	2.92	42,074
Energy Fuels Inc.	Common Shares	White, John Howell		5	1/27/2019	36	2.92	40,611
Energy Fuels Inc.	Common Shares	White, John Howell		5	2/1/2019	10	2.872	21,309
Energy Fuels Inc.	Rights Restricted Stock Units	White, John Howell		5	1/27/2019	36	2.92	58,174
Enghouse Systems Limited	Common Shares	Sadler, Stephen		3, 4, 5	1/28/2019	37		7,670,400
Entree Resources Ltd.	Common Shares	McLeod, Elizabeth	Susan	5	1/24/2019	10	0.53	158,352
Entree Resources Ltd.	Common Shares	McLeod, Elizabeth	Susan	5	1/29/2019	10	0.54	186,352
Epsilon Energy Ltd.	Common Shares	Clanton, Henry Nelson		5	1/5/2017	00		
Epsilon Energy Ltd.	Common Shares	Clanton, Henry Nelson		5	12/31/2018	56		17,500
Epsilon Energy Ltd.	Options	Clanton, Henry Nelson		5	1/30/2019	37		30,000
Epsilon Energy Ltd.	Common Shares	Epsilon Energy Ltd.		1	1/25/2019	38	5.61	57,353
Epsilon Energy Ltd.	Common Shares	Epsilon Energy Ltd.		1	1/28/2019	38	5.6	59,553
Epsilon Energy Ltd.	Common Shares	Roebuck, Ryan		4	1/28/2019	37		23,000
Epsilon Energy Ltd.	Common Shares	Roebuck, Ryan		4	1/28/2019	37		46,025
Equinox (formerly Inc.)	Gold Corp. Mining	Bailie, Rhylin Arkinstall	Pauline	5	12/31/2018	57	1	2,510
Equinox (formerly Inc.)	Gold Corp. Mining	Bailie, Rhylin Arkinstall	Pauline	5	1/10/2019	57	1.07	7,530
Equinox (formerly Inc.)	Gold Corp. Mining	Bailie, Rhylin Arkinstall	Pauline	5	12/31/2018	57	1	79,601
Equinox (formerly Inc.)	Gold Corp. Mining	Bailie, Rhylin Arkinstall	Pauline	5	1/10/2019	57	1.07	87,131
Equinox (formerly Inc.)	Gold Corp. Mining	Bailie, Rhylin Arkinstall	Pauline	5	1/28/2019	50	1.05	146,800
Equinox (formerly Inc.)	Gold Corp. Mining	Bailie, Rhylin Arkinstall	Pauline	5	1/28/2019	56		102,166
Equinox (formerly Inc.)	Gold Corp. Mining	Bailie, Rhylin Arkinstall	Pauline	5	1/28/2019	56		102,718
Equinox (formerly Inc.)	Gold Corp. Mining	Boggio, Lenard		4	1/28/2019	50	1.05	502,040

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Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share	Restricted Units - Time Based	Boggio, Lenard		4	1/28/2019	56		109,342	60,000
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Options		Currie, Alexander	James	5	11/6/2018	00			
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Options		Currie, Alexander	James	5	1/28/2019	50	1.05	121,800	121,800
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share	Restricted Units - Performance Based	Currie, Alexander		5	11/6/2018	00			
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share	Restricted Units - Performance Based	Currie, Alexander		5	1/28/2019	56		67,000	67,000
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share	Restricted Units - Time Based	Currie, Alexander		5	1/28/2019	56		259,000	134,000
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Options		D'Amici, Sebastian		5	1/28/2019	50	1.05	280,400	85,400
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share	Restricted Units - Performance Based	D'Amici, Sebastian		5	1/28/2019	56		194,333	47,000
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share	Restricted Units - Time Based	D'Amici, Sebastian		5	1/28/2019	56		259,250	94,000
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Options		de Groot, Marcel H.		3, 4, 5	1/23/2019	52	3.31	182,167	-62,015
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Options		de Groot, Marcel H.		3, 4, 5	1/28/2019	50	1.05	291,257	109,090
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share	Restricted Units - Time Based	de Groot, Marcel H.		3, 4, 5	1/28/2019	56		116,842	60,000
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Options		Hardie, Peter Jeremie		5	1/28/2019	50	1.05	337,700	122,700
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share	Restricted Units - Performance Based	Hardie, Peter Jeremie		5	1/28/2019	56		214,833	67,500
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share	Restricted Units - Time Based	Hardie, Peter Jeremie		5	1/28/2019	56		236,824	135,000
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Options		Heffernan, Robert Scott		5	1/28/2019	50	1.05	305,900	90,900
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share	Restricted Units - Performance Based	Heffernan, Robert Scott		5	1/28/2019	56		197,333	50,000
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share	Restricted Units - Time Based	Heffernan, Robert Scott		5	1/28/2019	56		192,887	100,000
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Options		Koval, Marshall		4	1/28/2019	50	1.05	318,590	109,090
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share	Restricted Units - Time Based	Koval, Marshall		4	1/28/2019	56		109,342	60,000
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Options		McMullen, Jacques		4	1/28/2019	50	1.05	502,040	109,090
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share	Restricted Units - Time Based	McMullen, Jacques		4	1/28/2019	56		109,342	60,000
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Options		Milau, Christian		4, 5	1/28/2019	50	1.05		177,200

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Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Options	Milau, Christian	4, 5	1/28/2019	50	1.05	417,200	177,200
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share Units - Performance Based	Milau, Christian	4, 5	1/28/2019	56		392,166	97,500
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share Units - Time Based	Milau, Christian	4, 5	1/28/2019	56		327,750	195,000
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Options	Smith, Gregory	4	1/23/2019	52	3.31	281,861	-31,007
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Options	Smith, Gregory	4	1/28/2019	50	1.05		177,200
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Options	Smith, Gregory	4	1/28/2019	50	1.05	459,061	177,200
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share Units - Performance Based	Smith, Gregory	4	9/17/2009	00			
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share Units - Performance Based	Smith, Gregory	4	1/28/2019	56		97,500	97,500
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share Units - Time Based	Smith, Gregory	4	1/28/2019	56		610,000	195,000
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Options	Toews, Susan Caroline	5	4/4/2018	00			
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Options	Toews, Susan Caroline	5	1/28/2019	50	1.05	66,200	66,200
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share Units - Performance Based	Toews, Susan Caroline	5	4/4/2018	00			
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share Units - Performance Based	Toews, Susan Caroline	5	1/28/2019	56		36,400	36,400
Equinox (formerly Inc.)	Gold Trek	Corp. Mining	Rights Share Units - Time Based	Toews, Susan Caroline	5	1/28/2019	56		157,800	72,800
Equitable Group Inc.			Common Shares	Wilson, Timothy James	5	1/28/2019	90		33	-185
Equitorial Corp.	Exploration		Common Shares	Power, Patrick Edward	4, 5	1/28/2019	10	0.035	346,000	100,000
Equitorial Corp.	Exploration		Common Shares	Power, Patrick Edward	4, 5	1/28/2019	10	0.03	350,000	4,000
European Dividend Fund	Focused		Trust Units	European Focused Dividend Fund	1	1/28/2019	38	7.7943	888,800	4,400
European Dividend Fund	Focused		Trust Units	European Focused Dividend Fund	1	1/29/2019	38	7.831	889,800	1,000
European Dividend Fund	Focused		Trust Units	European Focused Dividend Fund	1	1/30/2019	38	7.8763	890,600	800
Eviana Corporation	Health		Common Shares	Benloulou, Olivier Robert Francis	3	1/25/2019	10	0.75	2,924,200	-10,000
Excelsior Mining Corp.			Common Shares	Paine, Sheila Margaret	5	1/25/2019	10	0.81	10,000	-11,000
Filo Mining Corp.			Common Shares	Wodzicki, Wojtek Alexander	4, 5	1/24/2019	51	0.5	472,050	100,000
Filo Mining Corp.			Common Shares	Wodzicki, Wojtek Alexander	4, 5	2/1/2019	10	2.2	452,050	-20,000
Filo Mining Corp.			Options	Wodzicki, Wojtek Alexander	4, 5	1/24/2019	51	0.5	825,000	-100,000
First Majestic Corp.	Silver		Common Shares	Anthony, Todd Olson	5	1/30/2019	10	7.64	35,000	5,000
First Mexican Gold Corp.			Common Shares	Voisin, James Arthur Robert	4	1/29/2019	10	0.02	41,300	-120,000
First National Financial Corporation			Common Shares	First National Securities Corporation	3	1/30/2019	47		16,094,860	-35,064

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First National Financial Corporation	Common Shares	FNSC Holdings Inc.	3	1/30/2019	10	28.53	6,944,115	35,064
First National Financial Corporation	Common Shares	Smith, Stephen	4, 7, 5	1/30/2019	47		16,094,860	-35,064
First National Financial Corporation	Common Shares	Smith, Stephen	4, 7, 5	1/30/2019	10	28.53	6,944,115	35,064
Five Star Diamonds Limited	Common Shares	Waraich, Aneel Singh	4	1/28/2019	10	0.06	111,800	10,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Common Shares	Flow Capital Corp.	1	8/17/2018	00			
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Common Shares	Flow Capital Corp.	1	8/17/2018	38	0.155	89,500	89,500
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Common Shares	Flow Capital Corp.	1	8/31/2018	38	0.17	360,500	271,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Common Shares	Flow Capital Corp.	1	10/19/2018	38	0.16	369,500	9,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Common Shares	Flow Capital Corp.	1	12/13/2018	38	0.125	394,500	25,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Common Shares	Flow Capital Corp.	1	12/14/2018	38	0.125	472,500	78,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Common Shares	Flow Capital Corp.	1	12/20/2018	38	0.125	648,500	176,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Common Shares	Flow Capital Corp.	1	12/21/2018	38	0.125	869,500	221,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Common Shares	Flow Capital Corp.	1	12/31/2018	38	0.125	950,500	81,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Common Shares	Flow Capital Corp.	1	1/4/2019	38	0.12	1,101,500	151,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Common Shares	Flow Capital Corp.	1	1/11/2019	38	0.12	1,356,500	255,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Common Shares	Flow Capital Corp.	1	1/16/2019	38	0.12	1,518,000	161,500
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Common Shares	Flow Capital Corp.	1	1/18/2019	38	0.12	1,785,500	267,500
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Common Shares	Flow Capital Corp.	1	1/21/2019	38	0.12	2,085,500	300,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Common Shares	Flow Capital Corp.	1	1/21/2019	38	0.12	2,155,500	70,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 7%	Flow Capital Corp.	1	8/17/2018	00			
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 7%	Flow Capital Corp.	1	8/31/2018	38	75	\$10,000	\$10,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 7%	Flow Capital Corp.	1	11/23/2018	38	75	\$13,000	\$3,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 7%	Flow Capital Corp.	1	11/27/2018	38	75	\$17,000	\$4,000

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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/ Disposed
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 7%	Flow Capital Corp.	1	12/7/2018	38	75	\$36,000	\$19,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 7%	Flow Capital Corp.	1	12/10/2018	38	75	\$38,000	\$2,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 7%	Flow Capital Corp.	1	12/13/2018	38	75	\$41,000	\$3,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 7%	Flow Capital Corp.	1	12/20/2018	38	75	\$79,000	\$38,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 7%	Flow Capital Corp.	1	12/21/2018	38	75	\$80,000	\$1,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 7%	Flow Capital Corp.	1	12/31/2018	38	75	\$86,000	\$6,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 7%	Flow Capital Corp.	1	1/7/2019	38	75	\$91,000	\$5,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 8%	Flow Capital Corp.	1	8/17/2018	00			
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 8%	Flow Capital Corp.	1	8/20/2018	38	89	\$10,000	\$10,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 8%	Flow Capital Corp.	1	8/31/2018	38	89	\$25,000	\$15,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 8%	Flow Capital Corp.	1	9/20/2018	38	89	\$36,000	\$11,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 8%	Flow Capital Corp.	1	9/28/2018	38	89	\$40,000	\$4,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 8%	Flow Capital Corp.	1	10/22/2018	38	89	\$41,000	\$1,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 8%	Flow Capital Corp.	1	11/14/2018	38	92	\$48,000	\$7,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 8%	Flow Capital Corp.	1	11/15/2018	38	92	\$79,000	\$31,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 8%	Flow Capital Corp.	1	11/23/2018	38	92	\$83,000	\$4,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 8%	Flow Capital Corp.	1	11/27/2018	38	92	\$84,000	\$1,000
Flow Capital Corp. (formerly LOGiQ Asset Management Inc.)	Convertible Debentures - 8%	Flow Capital Corp.	1	11/30/2018	38	92	\$94,000	\$10,000

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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Flow Capital Corp. (formerly LOGIQ Asset Management Inc.)	Convertible Debentures - 8% Convertible Debentures	Flow Capital Corp.	1	1/22/2019	38	93.5	\$158,000	\$64,000
Flower One Holdings Inc. (formerly Theia Resources Ltd.)	Common Shares	Newell, Steven	3	1/30/2019	10	1.42	2,425,948	10,000
Foremost Income Fund	Trust Units	MacLennan, Bruce	4	1/31/2019	90		40,000	-6,233
Foremost Income Fund	Trust Units	MacLennan, Bruce	4	12/28/2005	00			
Foremost Income Fund	Trust Units	MacLennan, Bruce	4	1/31/2019	90		6,233	6,233
Founders Advantage Capital Corp.	Common Class A Shares	Bell, James Geral	4	2/1/2019	10	1.32	26,916	850
Founders Advantage Capital Corp.	Common Class A Shares	Bell, James Geral	4	2/1/2019	10	1.32	28,815	1,565
Franco-Nevada Corporation	Options	Blanchette, John	7	9/1/2018	00			
Franco-Nevada Corporation	Options	Blanchette, John	7	12/11/2018	50		20,000	20,000
Franco-Nevada Corporation	Rights Share Units (Performance)	Blanchette, John	7	9/1/2018	00			
Franco-Nevada Corporation	Rights Share Units (Performance)	Blanchette, John	7	12/11/2018	56		154	154
Franco-Nevada Corporation	Rights Share Units (Time-based)	Blanchette, John	7	9/1/2018	00			
Franco-Nevada Corporation	Rights Share Units (Time-based)	Blanchette, John	7	12/11/2018	56		154	154
Franco-Nevada Corporation	Options	Brink, Paul	5	8/20/2018	50		152,599	39,777
Franco-Nevada Corporation	Options	Brink, Paul	5	12/11/2018	50		170,385	17,786
Franco-Nevada Corporation	Rights Share Units (Performance)	Brink, Paul	5	12/11/2018	56		11,211	4,901
Franco-Nevada Corporation	Rights Share Units (Time-based)	Brink, Paul	5	12/11/2018	56		8,003	4,901
Franco-Nevada Corporation	Rights Share Units (Performance)	de Vries, Boris	7	12/11/2018	56		1,009	463
Franco-Nevada Corporation	Rights Share Units (Time-based)	de Vries, Boris	7	12/11/2018	56		827	463
Franco-Nevada Corporation	Options	Gray, Eaun Harrison	5	12/11/2018	50		77,484	4,509
Franco-Nevada Corporation	Rights Share Units (Performance)	Gray, Eaun Harrison	5	12/11/2018	56		2,525	1,242
Franco-Nevada Corporation	Rights Share Units (Time-based)	Gray, Eaun Harrison	5	12/11/2018	56		1,865	1,242
Franco-Nevada Corporation	Options	Harquail, David	4, 5	12/11/2018	50		206,668	31,188
Franco-Nevada Corporation	Rights Share Units (Performance)	Harquail, David	4, 5	12/11/2018	56		27,026	8,594
Franco-Nevada Corporation	Rights Share Units (Time-based)	Harquail, David	4, 5	12/11/2018	56		17,568	8,594
Franco-Nevada Corporation	Options	Hong, Lloyd Hyunsoo	5	12/11/2018	50		95,171	9,881
Franco-Nevada Corporation	Rights Share Units (Performance)	Hong, Lloyd Hyunsoo	5	12/11/2018	56		7,872	2,723

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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Franco-Nevada Corporation	Rights Restricted Share Units (Time-based)	Hong, Lloyd Hyunsoo	5	12/11/2018	56		5,272	2,723
Franco-Nevada Corporation	Options	O'Connell, Jason	5	12/11/2018	50		39,477	4,797
Franco-Nevada Corporation	Rights Restricted Share Units (Performance)	O'Connell, Jason	5	12/11/2018	56		3,746	1,322
Franco-Nevada Corporation	Rights Restricted Share Units (Time-based)	O'Connell, Jason	5	12/11/2018	56		2,497	1,322
Franco-Nevada Corporation	Options	Rana, Sandip	5	12/11/2018	50		126,109	10,869
Franco-Nevada Corporation	Rights Restricted Share Units (Performance)	Rana, Sandip	5	12/11/2018	56		8,724	2,995
Franco-Nevada Corporation	Rights Restricted Share Units (Time-based)	Rana, Sandip	5	12/11/2018	56		5,820	2,995
Franco-Nevada Corporation	Common Shares	Sparkes, Kerry Elwyn	5	12/31/2018	30		686	8
Franco-Nevada Corporation	Options	Sparkes, Kerry Elwyn	5	12/11/2018	50		11,154	2,590
Franco-Nevada Corporation	Rights Restricted Share Units (Performance)	Sparkes, Kerry Elwyn	5	12/11/2018	56		2,191	714
Franco-Nevada Corporation	Rights Restricted Share Units (Time-based)	Sparkes, Kerry Elwyn	5	12/11/2018	56		1,423	714
Franco-Nevada Corporation	Common Shares	Wilson, Philip Dane	5	12/31/2018	30		11,139	89
Franco-Nevada Corporation	Common Shares	Wilson, Philip Dane	5	9/7/2010	00			
Franco-Nevada Corporation	Common Shares	Wilson, Philip Dane	5	12/31/2018	30		16	16
Franco-Nevada Corporation	Common Shares	Wilson, Philip Dane	5	12/31/2018	30		65	12
Franco-Nevada Corporation	Options	Wilson, Philip Dane	5	12/11/2018	50		64,136	2,782
Franco-Nevada Corporation	Rights Restricted Share Units (Performance)	Wilson, Philip Dane	5	12/11/2018	56		3,541	1,150
Franco-Nevada Corporation	Rights Restricted Share Units (Time-based)	Wilson, Philip Dane	5	12/11/2018	56		1,531	767
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	6/17/2015	30	16.68	1,402	2
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	6/17/2015	30	16.68	1,407	5
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	7/17/2015	30	14.31	1,409	2
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	7/17/2015	30	14.31	1,415	6
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	8/19/2015	30	11.1	1,418	3
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	8/19/2015	30	11.1	1,426	8
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	9/17/2015	30	9.8	1,429	3
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	9/17/2015	30	9.8	1,438	9
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	10/19/2015	30	11.37	1,440	2
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	10/19/2015	30	11.37	1,446	6
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	11/18/2015	30	10.2	1,448	2
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	11/18/2015	30	10.2	1,455	7
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	12/21/2015	30	9.44	1,458	3
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	12/21/2015	30	9.44	1,465	7
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	1/19/2016	30	9.13	1,468	3
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	1/19/2016	30	9.13	1,476	8
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	2/18/2016	30	9.57	1,479	3
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	2/18/2016	30	9.57	1,486	7
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	3/17/2016	30	10.65	1,488	2
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	3/17/2016	30	10.65	1,494	6

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Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	4/19/2016	30	9.9	1,495	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	4/19/2016	30	9.9	1,499	4
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	5/18/2016	30	10.83	1,500	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	5/18/2016	30	10.83	1,503	3
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	6/17/2016	30	11.1	3,669	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	6/17/2016	30	11.1	3,680	11
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	7/19/2016	30	11.14	3,681	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	7/19/2016	30	11.14	3,692	11
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	8/17/2016	30	10.7	3,693	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	8/17/2016	30	10.7	3,705	12
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	9/15/2016	30	11.26	3,706	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	9/15/2016	30	11.26	3,717	11
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	10/17/2016	30	13.084	3,718	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	10/17/2016	30	13.084	3,728	10
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	11/15/2016	30	12.221	3,729	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	11/15/2016	30	12.221	3,739	10
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	12/15/2016	30	14.937	3,740	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	12/15/2016	30	14.937	3,748	8
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	1/16/2017	30	13.291	3,749	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	1/16/2017	30	13.291	3,758	9
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	2/15/2017	30	13.12	11,159	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	2/15/2017	30	13.12	11,169	10
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	3/15/2017	30	13.96	11,170	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	3/15/2017	30	13.96	11,179	9
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	4/17/2017	30	14.05	11,180	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	4/17/2017	30	14.05	11,191	11
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	5/15/2017	30	13.04	11,192	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	5/15/2017	30	13.04	11,204	12
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	6/15/2017	30	13.007	11,205	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	6/15/2017	30	13.007	11,217	12
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	7/17/2017	30	13.3	11,218	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	7/17/2017	30	13.3	11,230	12
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	8/15/2017	30	14.175	11,231	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	8/15/2017	30	14.175	11,242	11
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	9/15/2017	30	14.214	11,243	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	9/15/2017	30	14.214	11,254	11
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	10/16/2017	30	14.84	11,255	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	10/16/2017	30	14.84	11,266	11
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	11/15/2017	30	16.057	11,267	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	11/15/2017	30	16.057	11,277	10
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	12/15/2017	30	13.97	11,278	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	12/15/2017	30	13.97	11,290	12
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	1/15/2018	30	14.385	11,291	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	1/15/2018	30	14.385	11,302	11
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	2/15/2018	30	12.677	11,303	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	2/15/2018	30	12.677	11,316	13
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	3/15/2018	30	12.41	11,317	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	3/15/2018	30	12.41	11,330	13
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	4/16/2018	30	13.238	22,731	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	4/16/2018	30	13.238	22,784	53
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	4/16/2018	30	13.238	22,789	5
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	5/15/2018	30	13.41	22,790	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	5/15/2018	30	13.41	22,842	52
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	5/15/2018	30	13.41	22,846	4
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	6/15/2018	30	12.148	22,847	1
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	6/15/2018	30	12.148	22,905	58
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	6/15/2018	30	12.148	22,909	4
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	7/16/2018	30	12.349	22,910	1



**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/ Disposed	
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	7/16/2018	30	12.349	22,968	58	
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	7/16/2018	30	12.349	22,972	4	
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	8/15/2018	30	11.83	22,974	2	
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	8/15/2018	30	11.83	23,034	60	
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	8/15/2018	30	11.83	23,042	8	
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	9/17/2018	30	11.312	23,044	2	
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	9/17/2018	30	11.312	23,107	63	
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	9/17/2018	30	11.312	23,115	8	
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	10/15/2018	30	10.582	23,117	2	
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	10/15/2018	30	10.582	23,185	68	
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	10/15/2018	30	10.582	23,193	8	
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	11/15/2018	30	9.3583	23,195	2	
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	11/15/2018	30	9.3583	23,272	77	
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	11/15/2018	30	9.3583	23,280	8	
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	12/17/2018	30	8.4899	30,782	2	
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	12/17/2018	30	8.4899	30,790	8	
Freehold Royalties Ltd.	Common Shares	Mullane, Tom	4, 5	12/17/2018	30	8.4899	30,876	86	
Fronsac Real Estate Investment Trust	Participation Units	Trudeau, Michel Claude	4	2/1/2019	10	0.53	1,940,741	300,000	
Frontenac Mortgage Investment Corporation	Common Shares	Barnes, Robert	4	1/30/2019	30	30	51,848	806	
Frontenac Mortgage Investment Corporation	Common Shares	Blanchard, Andrew	4	1/30/2019	30	30	662	33	
Frontenac Mortgage Investment Corporation	Common Shares	Calvert, William	4	1/30/2019	30	30	13,087	100	
Frontenac Mortgage Investment Corporation	Common Shares	Chesney, Cara	4	1/30/2019	30	30	0	12	
Frontenac Mortgage Investment Corporation	Common Shares	Cruikshank, Kevin	5	1/30/2019	30	30	16,884	824	
Frontenac Mortgage Investment Corporation	Common Shares	Dinelle, Eric	4	1/30/2019	30	30	1,808	92	
Frontenac Mortgage Investment Corporation	Common Shares	Giroux, Marcel	5	1/30/2019	30	30	1,460	106	
Frontenac Mortgage Investment Corporation	Common Shares	Jacobs, Sheldon	4	1/30/2019	30	30	12,188	5	
Frontenac Mortgage Investment Corporation	Common Shares	Kehoe, Amber	5	1/30/2019	30	30	489	6	
Frontenac Mortgage Investment Corporation	Common Shares	Kelk, Margaret	4	1/30/2019	30	30	21,390	1,933	
Frontenac Mortgage Investment Corporation	Common Shares	REISER, DAWN	5	1/30/2019	30	30	1,726	70	
Frontenac Mortgage Investment Corporation	Common Shares	Robinson, Alison	7	1/30/2019	30	30	8,287	418	
Frontenac Mortgage Investment Corporation	Common Shares	Robinson, David Wayne	7	1/30/2019	30	30	2,100	106	
Frontenac Mortgage Investment Corporation	Common Shares	Robinson, Matthew James	7	1/30/2019	30	30	6,339	319	
Frontenac Mortgage Investment Corporation	Common Shares	Robinson, Wayne	5	1/30/2019	30	30	7,470	377	
Galway Metals Inc.	Common Shares	SUTTON, MICHAEL WILLIAM	4	1/28/2019	10	0.2058	1,667,673	10,000	
Generation Limited	Mining	levy, Jamie	4	1/29/2019	10	0.1	251,000	1,000	
Genesis Development Corp.	Land	Options	Stefaniuk, Arnold Leslie	5	6/14/2015	59	3.26	125,000	-45,000
Genesis Development Corp.	Land	Options	Stefaniuk, Arnold Leslie	5	6/30/2016	38			-170,000
Genesis Development Corp.	Land	Options	Stefaniuk, Arnold Leslie	5	6/30/2016	38	0		-125,000
GENIUS METALS INC.	Common Shares	Goulet, Guy	5	1/28/2019	10	0.185	845,686	1,000	
Global Innovation Dividend Fund	Trust Units	Brasseur, Jeremy	6	1/25/2019	10	9.4352	101,200	-62,200	
Global Innovation Dividend Fund	Trust Units	Brasseur, Jeremy	6	1/29/2019	10	9.3615	96,600	-4,600	

**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Global Innovation Dividend Fund	Trust Units	Brasseur, Jeremy	6	1/30/2019	10	9.45	90,000	-6,600
Global Innovation Dividend Fund	Trust Units	Global Innovation Dividend Fund	1	1/28/2019	38	9.259	760,400	1,000
Global Innovation Dividend Fund	Trust Units	Global Innovation Dividend Fund	1	1/29/2019	38	9.3014	761,100	700
Global Innovation Dividend Fund	Trust Units	Global Innovation Dividend Fund	1	1/31/2019	38	9.458	762,100	1,000
Global Real Estate & E-Commerce Dividend Fund	Trust Units	Brasseur, Jeremy	6	1/25/2019	10	9.3292	0	-41,236
Global Real Estate & E-Commerce Dividend Fund	Trust Units	Global Real Estate & E-Commerce Dividend Fund	1	1/28/2019	38	9.2703	195,500	3,100
Global Real Estate & E-Commerce Dividend Fund	Trust Units	Global Real Estate & E-Commerce Dividend Fund	1	1/29/2019	38	9.4831	198,700	3,200
Global Real Estate & E-Commerce Dividend Fund	Trust Units	Global Real Estate & E-Commerce Dividend Fund	1	1/30/2019	38	9.5	199,300	600
Global Real Estate & E-Commerce Dividend Fund	Trust Units	Global Real Estate & E-Commerce Dividend Fund	1	1/31/2019	38	9.4735	208,400	9,100
Globex Enterprises Inc.	Mining Common Shares	Globex Enterprises Inc.	1	1/28/2019	38	0.29	9,500	9,500
Globex Enterprises Inc.	Mining Common Shares	Globex Enterprises Inc.	1	1/29/2019	38	0.285	10,500	1,000
Globex Enterprises Inc.	Mining Common Shares	STOCH, DIANNE	4, 5	1/28/2019	10	0.29	1,139,647	25,000
Globex Enterprises Inc.	Mining Common Shares	STOCH, JACK	4, 5	1/28/2019	10	0.29	812,282	25,000
goeasy Ltd. (formerly, easyhome Ltd.)	Deferred Share Unit Plan	Appel, David Harry	4	1/31/2019	56	39.68	60,851	84
goeasy Ltd. (formerly, easyhome Ltd.)	Deferred Share Unit Plan	Basian, Karen	4	1/31/2019	56	39.68	19,939	85
goeasy Ltd. (formerly, easyhome Ltd.)	Deferred Share Unit Plan	Doniz, Susan	4	1/31/2019	56	39.68	3,770	84
goeasy Ltd. (formerly, easyhome Ltd.)	Common Shares	goeasy Ltd	1	1/21/2019	38	41.375	51,998	3,200
goeasy Ltd. (formerly, easyhome Ltd.)	Common Shares	goeasy Ltd	1	1/22/2019	38	40.224	56,398	4,400
goeasy Ltd. (formerly, easyhome Ltd.)	Common Shares	goeasy Ltd	1	1/22/2019	38		7,598	-48,800
goeasy Ltd. (formerly, easyhome Ltd.)	Common Shares	goeasy Ltd	1	1/23/2019	38	40.284	13,098	5,500
goeasy Ltd. (formerly, easyhome Ltd.)	Common Shares	goeasy Ltd	1	1/24/2019	38	39.96	17,798	4,700
goeasy Ltd. (formerly, easyhome Ltd.)	Common Shares	goeasy Ltd	1	1/25/2019	38	39.602	24,798	7,000
goeasy Ltd. (formerly, easyhome Ltd.)	Common Shares	goeasy Ltd	1	1/28/2019	38	39.19	29,098	4,300
goeasy Ltd. (formerly, easyhome Ltd.)	Common Shares	goeasy Ltd	1	1/29/2019	38	39.46	35,698	6,600
goeasy Ltd. (formerly, easyhome Ltd.)	Common Shares	goeasy Ltd	1	1/29/2019	38		10,898	-24,800
goeasy Ltd. (formerly, easyhome Ltd.)	Common Shares	goeasy Ltd	1	1/30/2019	38	41.5	16,198	5,300
goeasy Ltd. (formerly, easyhome Ltd.)	Common Shares	goeasy Ltd	1	1/31/2019	38	41.5	21,994	5,796
goeasy Ltd. (formerly, easyhome Ltd.)	Deferred Share Unit Plan	Johnson, Donald Kenneth	3, 4	1/31/2019	56	39.68	69,205	84
goeasy Ltd. (formerly, easyhome Ltd.)	Deferred Share Unit Plan	Morrison, Sean	4	1/31/2019	56	39.68	7,301	84
goeasy Ltd. (formerly, easyhome Ltd.)	Deferred Share Unit Plan	Thomson, David J.	4	1/31/2019	56	39.68	24,752	85
Gold Standard Ventures Corp.	Common Shares	Awde, Jonathan Charles Timothy	4, 6, 5	1/26/2019	57		865,194	39,494

**Insider Reporting**

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Gold Standard Ventures Corp.	Rights Subscription Restricted Share Units	Awde, Jonathan Charles Timothy	4, 6, 5	1/26/2019	57		78,989	-39,494
Gold Standard Ventures Corp.	Options	Boldt, Zara Elizabeth	4	1/31/2019	50	1.74	466,047	92,262
Gold Standard Ventures Corp.	Rights Subscription Restricted Share Units	Boldt, Zara Elizabeth	4	1/31/2019	56	1.74	81,269	44,540
Gold Standard Ventures Corp.	Options	Clayton, Ronald Wayne	4	1/31/2019	50	1.74	392,262	92,262
Gold Standard Ventures Corp.	Rights Subscription Restricted Share Units	Clayton, Ronald Wayne	4	1/30/2018	00			
Gold Standard Ventures Corp.	Rights Subscription Restricted Share Units	Clayton, Ronald Wayne	4	1/31/2019	56	1.74	44,540	44,540
Gold Standard Ventures Corp.	Common Shares	Jackson, Mac Roy	5	1/26/2019	57		188,447	19,747
Gold Standard Ventures Corp.	Rights Subscription Restricted Share Units	Jackson, Mac Roy	5	1/26/2019	57		39,494	-19,747
Gold Standard Ventures Corp.	Common Shares	Kumoi, Glenn Yoshiaki	5	1/26/2019	57		39,806	19,806
Gold Standard Ventures Corp.	Options	Kumoi, Glenn Yoshiaki	5	1/31/2019	50	1.74	530,207	85,842
Gold Standard Ventures Corp.	Rights Subscription Restricted Share Units	Kumoi, Glenn Yoshiaki	5	1/26/2019	57		39,613	-19,806
Gold Standard Ventures Corp.	Rights Subscription Restricted Share Units	Kumoi, Glenn Yoshiaki	5	1/31/2019	56	1.74	81,189	41,576
Gold Standard Ventures Corp.	Rights Subscription Restricted Share Units	Kumoi, Glenn Yoshiaki	5	1/31/2019	56	1.74	100,844	19,655
Gold Standard Ventures Corp.	Common Shares	McLeod, Robert John	4	1/31/2019	56	1.74	109,540	44,540
Gold Standard Ventures Corp.	Options	McLeod, Robert John	4	1/31/2019	50	1.74	217,262	92,262
Gold Standard Ventures Corp.	Options	Morrison, Alexander	4	1/31/2019	50	1.74	466,047	92,262
Gold Standard Ventures Corp.	Rights Subscription Restricted Share Units	Morrison, Alexander	4	1/31/2019	56	1.74	81,269	44,540
Gold Standard Ventures Corp.	Options	Strauss, James Digby Ronald	4	1/31/2019	50	1.74	616,047	92,262
Gold Standard Ventures Corp.	Rights Subscription Restricted Share Units	Strauss, James Digby Ronald	4	1/31/2019	46	1.74	81,269	44,540
Gold Standard Ventures Corp.	Common Shares	Waldkirch, Michael	5	1/26/2019	57		371,874	12,874
Gold Standard Ventures Corp.	Rights Subscription Restricted Share Units	Waldkirch, Michael	5	1/26/2019	57		25,748	-12,874
Goldcorp Inc.	Common Shares	Oraziotti, Richard	5	12/31/2018	30	15.61	29,868	1,703
Goldeneye Resources Corp.	Common Shares	Bal, Jatinder Singh	4	1/25/2019	10	0.085	2,936,850	-100,000
Goldeneye Resources Corp.	Common Shares	Bal, Jatinder Singh	4	1/28/2019	11	0.09	2,254,500	-682,350
GoldQuest Mining Corp.	Options	Michaels, Patrick	4	3/8/2018	52		2,510,000	-400,000
GoldQuest Mining Corp.	Options	Michaels, Patrick	4	12/19/2018	52		2,250,000	-260,000
GoldQuest Mining Corp.	Options	Michaels, Patrick	4	1/21/2019	50	0.15	3,000,000	750,000
Gran Tierra Energy Inc.	Common Shares	GMT Capital Corp	3	1/25/2019	10	2.14	1,526,900	630,000
Great Canadian Gaming Corporation	Common Shares	Newsome, Matthew Alexander	5	12/31/2018	30	42.43	3,110	148
Great Panther Silver Limited	Common Shares	Rees, Helena Elise	4	1/21/2019	10	0.81	7,500	2,500

**Insider Reporting**

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Green Growth Brands Inc. (formerly Xanthic Biopharma Inc.)	Proportionate Voting Shares	All Js Greenspace LLC	3	1/25/2019	11		40,698	2,504
Greenfields Corporation	Petroleum Options	Harkins, John Wilfrid Hugh	4, 5	10/16/2018	37	2.9		-270,000
Greenfields Corporation	Petroleum Options	Harkins, John Wilfrid Hugh	4, 5	10/16/2018	37	2.9	33,000	-270,000
Greenfields Corporation	Petroleum Options	Harkins, John Wilfrid Hugh	4, 5	1/29/2019	38	32.5	30,000	-3,000
Greenfields Corporation	Petroleum Options	Hibberd, Michael John	4	10/11/2018	52	3.2	0	-30,000
Guyana Goldfields Inc.	Common Shares	Holloway, Perry Lee	5	1/1/2019	00			
Guyana Goldfields Inc.	Options	Holloway, Perry Lee	5	1/1/2019	00			
Guyana Goldfields Inc.	Rights Restricted Share Units	Holloway, Perry Lee	5	1/1/2019	00		89,745	
Guyana Goldfields Inc.	Warrants	Holloway, Perry Lee	5	1/1/2019	00			
Harte Gold Corp.	Options	Flach, George Andrew	4, 5	1/18/2019	50			1,000,000
Harte Gold Corp.	Options	Flach, George Andrew	4, 5	1/18/2019	50			1,000,000
Harte Gold Corp.	Options	Flach, George Andrew	4, 5	1/18/2019	50			1,000,000
Havilah Corporation	Mining Common Shares	Schultz, Blair	4, 5	1/30/2019	10	0.28	289,875	8,500
Havilah Corporation	Mining Common Shares	Schultz, Blair	4, 5	1/31/2019	10	0.28	308,875	19,000
Havilah Corporation	Mining Common Shares	Schultz, Blair	4, 5	2/1/2019	10	0.28	311,375	2,500
Healthcare Opportunities Fund	Special Trust Units Class A	LDIC Inc.	3	1/29/2019	10	11.193	2,500,838	-1,525
Healthcare Opportunities Fund	Special Trust Units Class A	LDIC Inc.	3	1/30/2019	10	11.19	2,500,738	-100
Healthcare Opportunities Fund	Special Trust Units Class A	LDIC Inc.	3	1/31/2019	10	11.19	2,498,038	-2,700
HI HO SILVER RESOURCES INC.	Common Shares	Gubash, Milan	4	1/31/2019	46	0.1	655,000	150,000
HI HO SILVER RESOURCES INC.	Warrants	Gubash, Milan	4	1/31/2019	46		655,000	150,000
HI HO SILVER RESOURCES INC.	Common Shares	Jorgenson, Dennis	4	1/31/2019	46	0.1	601,000	50,000
HI HO SILVER RESOURCES INC.	Warrants	Jorgenson, Dennis	4	1/31/2019	46		90,000	50,000
HI HO SILVER RESOURCES INC.	Common Shares	Jorgenson, Kevin	5	1/31/2019	46	0.1	210,000	150,000
HI HO SILVER RESOURCES INC.	Warrants	Jorgenson, Kevin	5	1/31/2019	46		210,000	150,000
HI HO SILVER RESOURCES INC.	Common Shares	Jorgenson, Steve	5	1/31/2019	46	0.1	530,000	250,000
HI HO SILVER RESOURCES INC.	Warrants	Jorgenson, Steve	5	1/31/2019	46		530,000	250,000
HI HO SILVER RESOURCES INC.	Common Shares	jorgenson, william george	4	1/31/2019	46	0.1	1,600,000	250,000
HI HO SILVER RESOURCES INC.	Warrants	jorgenson, william george	4	1/31/2019	46		1,500,000	250,000
Hilltop Cybersecurity Inc.	Common Shares	Marshall, Corby Wayne	5	1/25/2019	36		3,000,000	3,000,000
Horizon North Logistics Inc.	Rights RSU	Anderson, William Herald	5	2/1/2019	59		43,668	-8,333
Horizon North Logistics Inc.	Rights RSU	Murray, Warren Petrie	7	2/1/2019	59			-15,000
Horizon North Logistics Inc.	Rights RSU	Murray, Warren Petrie	7	2/1/2019	56		47,500	15,000
Hornby Bay Mineral Exploration Ltd. (formerly, Unor Inc.)	Options	Irwin, Christopher	4	2/3/2010	00			
Hornby Bay Mineral Exploration Ltd. (formerly, Unor Inc.)	Options	Irwin, Christopher	4	1/28/2019	50	0.05	500,000	500,000

**Insider Reporting**

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Hornby Bay Mineral Exploration Ltd. (formerly, Unor Inc.)	Options	Ramos, Arvin	5	9/13/2017	00			
Hornby Bay Mineral Exploration Ltd. (formerly, Unor Inc.)	Options	Ramos, Arvin	5	1/28/2019	50		500,000	500,000
Hudbay Minerals Inc. (formerly HudBay Minerals Inc.)	Common Shares	Waterton Resource Management, Inc.	3	1/24/2019	10	7.25	15,669,925	6,100
Hudbay Minerals Inc. (formerly HudBay Minerals Inc.)	Common Shares	Waterton Resource Management, Inc.	3	1/24/2019	10	7.25	15,669,933	6,100
Hunt Mining Corp	Common Shares	Chan, Alan Pui Fai	4, 5	1/30/2019	10	0.18	14,000	-2,500
Hut 8 Mining Corp. (formerly, Oriana Resources Corporation)	Common Shares	Kiguel, Andrew	4, 5	4/2/2018	00			
Hut 8 Mining Corp. (formerly, Oriana Resources Corporation)	Common Shares	Kiguel, Andrew	4, 5	1/7/2019	11	1.2	20,833	20,833
Hut 8 Mining Corp. (formerly, Oriana Resources Corporation)	Common Shares	Novogratz, Michael Edward	4	3/2/2018	00			
Hut 8 Mining Corp. (formerly, Oriana Resources Corporation)	Common Shares	Novogratz, Michael Edward	4	1/7/2019	11	1.2	20,833	20,833
Hut 8 Mining Corp. (formerly, Oriana Resources Corporation)	Common Shares	Tai, William (Bill) Ping	4	1/7/2019	11	1.2	689,286	20,833
Hut 8 Mining Corp. (formerly, Oriana Resources Corporation)	Common Shares	Vaiopoulos, Demetrios	5	7/10/2018	00			
Hut 8 Mining Corp. (formerly, Oriana Resources Corporation)	Common Shares	Vaiopoulos, Demetrios	5	1/28/2019	11	1.2	4,167	4,167
Hut 8 Mining Corp. (formerly, Oriana Resources Corporation)	Common Shares	Vavilovs, Valerijs	4	3/2/2018	00			
Hut 8 Mining Corp. (formerly, Oriana Resources Corporation)	Common Shares	Vavilovs, Valerijs	4	1/7/2019	11	1.2	20,833	20,833
IAMGOLD Corporation	Common Shares	MacDougall, Stephen	5	12/31/2018	30	6.06	126,047	10,137
IAMGOLD Corporation	Common Shares	Snow, Alexander	5	12/31/2018	30	6.06	211,552	9,743
IGM Financial Inc.	Executive Performance Share Units	Asman, Todd	7	1/31/2019	30	33.78	8,771	144
IGM Financial Inc.	Restricted Share Units	Asman, Todd	7	1/31/2019	30	33.78	1,012	17
IGM Financial Inc.	Executive Performance Share Units	Bast, Esther	7	1/31/2019	30	33.78	2,947	48
IGM Financial Inc.	Restricted Share Units	Bast, Esther	7	1/31/2019	30	33.78	1,078	18
IGM Financial Inc.	Senior Executive Share Units	Bast, Esther	7	1/31/2019	30	33.78	12,776	209
IGM Financial Inc.	Executive Performance Share Units	Carney, Jeffrey	4, 5	1/31/2019	30	33.78	93,764	1,536
IGM Financial Inc.	Senior Executive Share Units	Carney, Jeffrey	4, 5	1/31/2019	30	33.78	9,787	161
IGM Financial Inc.	Executive Performance Share Units	Dibden, William	7	1/31/2019	30	33.78	7,216	118
IGM Financial Inc.	Restricted Share Units	Dibden, William	7	1/31/2019	30	33.78	2,887	48
IGM Financial Inc.	Executive Performance Share Units	Elavia, Tony	7	1/31/2019	30	33.78	20,439	335
IGM Financial Inc.	Restricted Share Units	Elavia, Tony	7	1/31/2019	30	33.78	2,976	49

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Issuer Name	Security		Insider Name		Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
IGM Financial Inc.	Senior Share Units	Executive	Elavia, Tony		7	1/31/2019	30	33.78	4,295	70
IGM Financial Inc.	Executive Performance Units	Share	Goldberg, Rhonda		5	1/31/2019	30	33.78		73
IGM Financial Inc.	Executive Performance Units	Share	Goldberg, Rhonda		5	1/31/2019	30	33.78		73
IGM Financial Inc.	Executive Performance Units	Share	Goldberg, Rhonda		5	1/31/2019	30	33.78	4,472	74
IGM Financial Inc.	Restricted Share Units		Goldberg, Rhonda		5	1/31/2019	30	33.78	1,112	18
IGM Financial Inc.	Executive Performance Units	Share	Gould, J. Luke		5	1/31/2019	30	33.78	6,520	107
IGM Financial Inc.	Restricted Share Units		Gould, J. Luke		5	1/31/2019	30	33.78	1,269	21
IGM Financial Inc.	Equity Forward - IGM 13		IGM Financial Inc.		1	1/31/2019	30	33.78	5	1
IGM Financial Inc.	Equity Forward - IGM7		IGM Financial Inc.		1	1/31/2019	30	33.78	8	1
IGM Financial Inc.	Equity Forward Contract - IGM 6		IGM Financial Inc.		1	1/31/2019	30	33.78	11	1
IGM Financial Inc.	Equity Swap - IGM14		IGM Financial Inc.		1	1/31/2019	30	33.78	4	1
IGM Financial Inc.	Equity Swap - IGM15		IGM Financial Inc.		1	1/31/2019	30	33.78	3	1
IGM Financial Inc.	Executive Performance Units	Share	Kinzel, Mark Richard		7	1/31/2019	30	33.78	12,530	205
IGM Financial Inc.	Restricted Share Units		Kinzel, Mark Richard		7	1/31/2019	30	33.78	1,451	24
IGM Financial Inc.	Executive Performance Units	Share	Lawrence, Ian		7	1/31/2019	30	33.78	2,619	43
IGM Financial Inc.	Restricted Share Units		Lawrence, Ian		7	1/31/2019	30	33.78	975	15
IGM Financial Inc.	Executive Performance Units	Share	McDevitt, Charles		7	1/31/2019	30	33.78	16,251	266
IGM Financial Inc.	Executive Performance Units	Share	McInerney, Barry		7	1/31/2019	30	33.78	51,010	836
IGM Financial Inc.	Executive Performance Units	Share	Milne, Douglas		7	1/31/2019	30	33.78	2,399	39
IGM Financial Inc.	Restricted Share Units		Milne, Douglas		7	1/31/2019	30	33.78	960	16
IGM Financial Inc.	Executive Performance Units	Share	Sen, Subhas		7	1/31/2019	30	33.78	3,194	52
IGM Financial Inc.	Restricted Share Units		Sen, Subhas		7	1/31/2019	30	33.78	949	15
IGM Financial Inc.	Executive Performance Units	Share	Shewchuk, Blaine		7	1/31/2019	30	33.78	4,539	74
IGM Financial Inc.	Restricted Share Units		Shewchuk, Blaine		7	1/31/2019	30	33.78	926	15
IGM Financial Inc.	Senior Share Units	Executive	Tretiak, Dennis	Gregory	4, 6	1/31/2019	30	33.78	8,496	139
IMPACT Silver Corp.	Common Shares		TANAKA, AKIRA	VICTOR	4	1/31/2019	11	0.27	50,000	50,000
IMPACT Silver Corp.	Warrants		TANAKA, AKIRA	VICTOR	4	6/11/2003	00			
IMPACT Silver Corp.	Warrants		TANAKA, AKIRA	VICTOR	4	1/31/2019	11	0.35	50,000	50,000
Imperial Oil Limited	Common Shares		Exxon Corporation	Mobil	3	1/24/2019	38	36.65	542,760,544	-112,001
Imperial Oil Limited	Common Shares		Exxon Corporation	Mobil	3	1/25/2019	38	36.99	542,648,543	-112,001
Imperial Oil Limited	Common Shares		Exxon Corporation	Mobil	3	1/28/2019	38	36.74	542,536,542	-112,001
Imperial Oil Limited	Common Shares		Exxon Corporation	Mobil	3	1/29/2019	38	36.6	542,424,541	-112,001

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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Imperial Oil Limited	Common Shares	Exxon Mobil Corporation	3	1/30/2019	38	37.27	542,312,540	-112,001
Imperial Oil Limited	Common Shares	Jolly, Bruce	7	3/31/2018	30	34.51	23,247	196
Imperial Oil Limited	Common Shares	Jolly, Bruce	7	3/31/2018	30	34.42	23,246	-1
Imperial Oil Limited	Common Shares	Jolly, Bruce	7	4/30/2018	30	34.96	23,452	206
Imperial Oil Limited	Common Shares	Jolly, Bruce	7	4/30/2018	30	33.81	23,451	-1
Imperial Oil Limited	Common Shares	Jolly, Bruce	7	5/31/2018	30	40.64	23,525	74
Imperial Oil Limited	Common Shares	Jolly, Bruce	7	5/31/2018	30	39.39	23,524	-1
Imperial Oil Limited	Common Shares	Jolly, Bruce	7	6/30/2018	30	43.12	23,594	70
Imperial Oil Limited	Common Shares	Jolly, Bruce	7	6/30/2018	30	42.43	23,593	-1
Imperial Oil Limited	Common Shares	Jolly, Bruce	7	7/31/2018	30	43.67	23,764	171
Imperial Oil Limited	Common Shares	Jolly, Bruce	7	7/31/2018	30	43.38	23,763	-1
Imperial Oil Limited	Common Shares	Jolly, Bruce	7	8/31/2018	30	42.43	23,834	71
Imperial Oil Limited	Common Shares	Jolly, Bruce	7	8/31/2018	30	44.01	23,833	-1
Imperial Oil Limited	Common Shares	Jolly, Bruce	7	9/30/2018	30	39.9	23,908	75
Imperial Oil Limited	Common Shares	Jolly, Bruce	7	9/30/2018	30	40.58	23,907	-1
Imperial Oil Limited	Common Shares	Jolly, Bruce	7	10/31/2018	30	42.31	24,086	179
Imperial Oil Limited	Common Shares	Jolly, Bruce	7	10/31/2018	30	42.66	24,085	-1
Imperial Oil Limited	Common Shares	Jolly, Bruce	7	11/30/2018	30	41.75	24,157	72
Imperial Oil Limited	Common Shares	Jolly, Bruce	7	11/30/2018	30	41.32	24,156	-1
Imperial Oil Limited	Common Shares	Jolly, Bruce	7	12/31/2018	30	41.61	24,281	125
Imperial Oil Limited	Common Shares	Murphy, Barry	5	11/30/2018	30	42.19	4,331	30
Imperial Oil Limited	Common Shares	Murphy, Barry	5	11/30/2018	30	41.32	4,330	-1
Imperial Oil Limited	Common Shares	Murphy, Barry	5	12/31/2018	30	41.2	4,436	106
Imperial Oil Limited	Common Shares	Redburn, Theresa B.	7	1/31/2018	30	38.5	3,253	14
Imperial Oil Limited	Common Shares	Redburn, Theresa B.	7	1/31/2018	30	39.11	3,252	-1
Imperial Oil Limited	Common Shares	Redburn, Theresa B.	7	2/28/2018	30	38.7	3,251	-1
Imperial Oil Limited	Common Shares	Redburn, Theresa B.	7	3/31/2018	30	34.42	3,250	-1
Imperial Oil Limited	Common Shares	Redburn, Theresa B.	7	4/30/2018	30	34.47	3,265	15
Imperial Oil Limited	Common Shares	Redburn, Theresa B.	7	4/30/2018	30	33.81	3,264	-1
Imperial Oil Limited	Common Shares	Redburn, Theresa B.	7	5/31/2018	30	39.39	3,263	-1
Imperial Oil Limited	Common Shares	Redburn, Theresa B.	7	6/30/2018	30	42.42	3,262	-1
Imperial Oil Limited	Common Shares	Redburn, Theresa B.	7	7/31/2018	30	43.47	3,276	14
Imperial Oil Limited	Common Shares	Redburn, Theresa B.	7	7/31/2018	30	43.38	3,275	-1
Imperial Oil Limited	Common Shares	Redburn, Theresa B.	7	8/31/2018	30	44.01	3,274	-1
Imperial Oil Limited	Common Shares	Redburn, Theresa B.	7	9/30/2018	30	40.58	3,273	-1
Imperial Oil Limited	Common Shares	Redburn, Theresa B.	7	10/31/2018	30	41.2	3,288	15
Imperial Oil Limited	Common Shares	Redburn, Theresa B.	7	10/31/2018	30	42.66	3,287	-1
Imperial Oil Limited	Common Shares	Redburn, Theresa B.	7	11/30/2018	30	41.32	3,286	-1
Imperial Oil Limited	Common Shares	Wetmore, Jonathan	5	10/31/2018	30	42.69	9,252	115
Imperial Oil Limited	Common Shares	Wetmore, Jonathan	5	10/31/2018	30	42.66	9,251	-1
Imperial Oil Limited	Common Shares	Wetmore, Jonathan	5	11/30/2018	30	41.75	9,324	73
Imperial Oil Limited	Common Shares	Wetmore, Jonathan	5	11/30/2018	30	41.32	9,323	-1
Imperial Oil Limited	Common Shares	Wetmore, Jonathan	5	12/31/2018	30	41.61	9,451	128
Inca One Gold Corp.	Common Shares	Kelly, Edward John	4	1/29/2019	47	0.05	3,680,127	-1,000,000
Integrity Gaming Corp. (formerly, Poydras Gaming Finance Corp.)	Common Shares	morfe y, steven ryan	3	1/28/2019	10	0.455	3,943,000	100,000
Integrity Gaming Corp. (formerly, Poydras Gaming Finance Corp.)	Common Shares	morfe y, steven ryan	3	1/30/2019	10	0.455	4,016,000	73,000
Integrity Gaming Corp. (formerly, Poydras Gaming Finance Corp.)	Common Shares	morfe y, steven ryan	3	1/31/2019	10	0.455		500
Integrity Gaming Corp. (formerly, Poydras Gaming Finance Corp.)	Common Shares	morfe y, steven ryan	3	1/31/2019	10	0.455		500
Integrity Gaming Corp. (formerly, Poydras Gaming Finance Corp.)	Common Shares	morfe y, steven ryan	3	1/31/2019	10	0.455	4,016,500	500

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Interfor Corporation	Common Shares	Interfor Corporation	1	1/24/2019	38	15.892	173,000	18,000
Interfor Corporation	Common Shares	Interfor Corporation	1	1/29/2019	38		43,000	-130,000
International Prospect Ventures Ltd. (formerly Uranium Valley Mines Ltd.)	Common Shares	Valliant, Robert Irwin	4	1/31/2019	45	0.15	1,600,000	1,600,000
Intrinsyc Technologies Corporation	Common Shares	Intrinsyc Technologies Corporation	1	1/28/2019	10	1.58	200	200
Intrinsyc Technologies Corporation	Common Shares	Intrinsyc Technologies Corporation	1	1/28/2019	10	1.57	1,300	1,100
Intrinsyc Technologies Corporation	Common Shares	Intrinsyc Technologies Corporation	1	1/28/2019	10	1.55	3,300	2,000
Intrinsyc Technologies Corporation	Common Shares	Intrinsyc Technologies Corporation	1	1/28/2019	38		0	-3,300
INV Metals Inc.	Restricted Share Units	Clucas, James David	4, 5	1/28/2019	56		86,538	44,872
INV Metals Inc.	Restricted Share Units	Farsangi, Parviz	4	1/28/2019	56		80,129	55,129
INV Metals Inc.	Restricted Share Units	Klein, Eric	4	1/28/2019	56		113,463	55,129
INV Metals Inc.	Restricted Share Units	MacGibbon, Terry	4	1/28/2019	56		462,821	79,488
INV Metals Inc.	Restricted Share Units	Pollock, Robert	4	1/28/2019	56		43,590	43,590
INV Metals Inc.	Restricted Share Units	Weisman, Robin Leslie	4	11/15/2017	00			
INV Metals Inc.	Restricted Share Units	Weisman, Robin Leslie	4	1/28/2019	56		41,026	41,026
Invesque Inc. (formerly, Mainstreet Health Investments Inc.)	Common Shares	Invesque, Inc.	1	12/27/2018	38	6.7397		7,900
Invesque Inc. (formerly, Mainstreet Health Investments Inc.)	Common Shares	Invesque, Inc.	1	12/27/2018	38	6.7397		7,900
Invesque Inc. (formerly, Mainstreet Health Investments Inc.)	Common Shares	Invesque, Inc.	1	12/27/2018	38	6.5311	54,500	7,900
Invesque Inc. (formerly, Mainstreet Health Investments Inc.)	Common Shares	Invesque, Inc.	1	12/28/2018	38	6.5259	60,300	5,800
Invesque Inc. (formerly, Mainstreet Health Investments Inc.)	Common Shares	Invesque, Inc.	1	1/17/2019	38		0	-60,300
Invesque Inc. (formerly, Mainstreet Health Investments Inc.)	Common Shares	Invesque, Inc.	1	1/27/2019	38	6.7397		7,900
Invesque Inc. (formerly, Mainstreet Health Investments Inc.)	Common Shares	Invesque, Inc.	1	1/27/2019	38	6.7397		7,900
Invesque Inc. (formerly, Mainstreet Health Investments Inc.)	Common Shares	Invesque, Inc.	1	1/28/2019	38	6.5311		5,800
Invesque Inc. (formerly, Mainstreet Health Investments Inc.)	Common Shares	Invesque, Inc.	1	1/28/2019	38	6.5311		5,800
Invictus MD Strategies Corp.	Options	Bowden, Aaron	4	1/28/2019	50	1.2	715,000	150,000
Invictus MD Strategies Corp.	Options	Kveton, George Edward	5	1/28/2019	50	1.2	2,090,000	600,000
Invictus MD Strategies Corp.	Options	Sparkes, Paul David	5	1/28/2019	50	1.2	550,000	150,000
Invictus MD Strategies Corp.	Options	Stein, Keith	4	1/11/2019	00			
Invictus MD Strategies Corp.	Options	Stein, Keith	4	1/28/2019	50	1.2	150,000	150,000
Ivanhoe Mines Ltd.	Rights Restricted Share Units	Bawlf, Martin Forrester	5	2/1/2019	59		164,479	-31,035
Ivanhoe Mines Ltd.	Rights Restricted Share Units	Bos, Matthieu	7	2/1/2019	59		141,048	-19,000
Ivanhoe Mines Ltd.	Rights Restricted Share Units	Cloete, Martie	7, 5	2/1/2019	59		229,276	-46,687
Ivanhoe Mines Ltd.	Rights Restricted Share Units	Farren, Mark Sean	5	2/1/2019	59		273,175	-58,106



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Ivanhoe Mines Ltd.	Common	Shares	Friedland, Robert	Martin	3, 4, 6, 5	2/1/2019	57		34,370,270	122,262
Ivanhoe Mines Ltd.	Rights	Restricted Share Units	Friedland, Robert	Martin	3, 4, 6, 5	2/1/2019	57		525,838	-122,262
Ivanhoe Mines Ltd.	Rights	Restricted Share Units	Johansson, Lars-Eric		7, 5	2/1/2019	59		542,530	-122,262
Ivanhoe Mines Ltd.	Rights	Restricted Share Units	Makhesha, Patricia	Setha	7	2/1/2019	59		189,340	-35,793
Ivanhoe Mines Ltd.	Common	Shares	Mikhael, Elia		7	2/1/2019	57		228,898	33,334
Ivanhoe Mines Ltd.	Rights	Restricted Share Units	Mikhael, Elia		7	2/1/2019	57		54,788	-33,334
Ivanhoe Mines Ltd.	Rights	Deferred Share Units	Sun, Yufeng		4	12/4/2018	56			17,304
Ivanhoe Mines Ltd.	Rights	Deferred Share Units	Sun, Yufeng		4	1/1/2019	56			74,819
Ivanhoe Mines Ltd.	Rights	Restricted Share Units	Sun, Yufeng		4	9/19/2018	00			
Ivanhoe Mines Ltd.	Rights	Restricted Share Units	Sun, Yufeng		4	12/4/2018	56		17,304	17,304
Ivanhoe Mines Ltd.	Rights	Restricted Share Units	Sun, Yufeng		4	1/1/2019	56		92,123	74,819
Ivanhoe Mines Ltd.	Common	Shares	Vincelli, Mary		5	2/1/2019	57		42,155	3,517
Ivanhoe Mines Ltd.	Rights	Restricted Share Units	Vincelli, Mary		5	2/1/2019	59		53,212	-3,517
Ivanhoe Mines Ltd.	Rights	Restricted Share Units	Vincelli, Mary		5	2/1/2019	57		49,695	-3,517
Jinhua Corporation	Capital	Common Shares	Browne, Robert		3	1/18/2019	00		446,000	
Kalytera Therapeutics, Inc.	Options		Erickson, Ronald Peter		4, 7	1/25/2019	50		4,141,083	1,129,318
Kalytera Therapeutics, Inc.	Options		Farrell, Robert Edward		4, 7, 5	1/25/2019	50		13,870,849	1,246,092
Kalytera Therapeutics, Inc.	Options		paley, jeffrey		4	1/25/2019	50		3,761,618	1,129,318
Kalytera Therapeutics, Inc.	Options		Rudman, Victoria Diana		7, 5	1/25/2019	50		897,360	300,000
Kelt Exploration Ltd.	Common	Shares	Franks, Alan G.		5	12/31/2018	30	7	23,982	5,825
Kelt Exploration Ltd.	Common	Shares	Gigg, Bruce Douglas		5	2/3/2019	30	7	80,701	5,701
Kelt Exploration Ltd.	Common	Shares	MacArthur, Douglas Owen		5	12/31/2018	30	7	714,294	5,825
Kelt Exploration Ltd.	Common	Shares	Miles, Patrick	William George	5	12/31/2018	30	7	839,958	5,825
Keyera Corp.	Common	Shares	Haughey, Douglas J.		4	12/31/2018	30	33.11	11,719	579
Keyera Corp.	Common	Shares	Haughey, Douglas J.		4	12/31/2018	30	33.44	11,140	-579
Keyera Corp.	Common	Shares	Koshman, Richard N		5	12/31/2018	30	33.11	7,890	390
Keyera Corp.	Common	Shares	Koshman, Richard N		5	12/31/2018	30	33.44	7,500	-390
Keyera Corp.	Common	Shares	Kostiuk, Dion Otto		5	12/31/2018	30	33.11	17,857	882
Keyera Corp.	Common	Shares	Kostiuk, Dion Otto		5	12/31/2018	30	33.44	16,975	-882
Keyera Corp.	Common	Shares	Kroeker, Steven	Barney	5	12/31/2018	30	33.08	106,207	5,060
Keyera Corp.	Common	Shares	Kroeker, Steven	Barney	5	12/31/2018	30	33.41	101,147	-5,060
Keyera Corp.	Common	Shares	Lock, Bradley Wayne		5	12/31/2018	30	33.09	173,682	8,666
Keyera Corp.	Common	Shares	Nelson, Donald J.		4	12/31/2018	30	33.33	73,244	920
Keyera Corp.	Common	Shares	Nelson, Donald J.		4	12/31/2018	30	33.11	76,097	2,853
Keyera Corp.	Common	Shares	Nelson, Donald J.		4	12/31/2018	30	33.44	73,244	-2,853
Keyera Corp.	Common	Shares	Nelson, Donald J.		4	12/31/2018	30	33.33	6,924	345
Keyera Corp.	Common	Shares	Nelson, Donald J.		4	12/31/2018	30	33.33	1,971	94
Keyera Corp.	Common	Shares	Setoguchi, Curtis Dean		5	12/31/2018	30	33.14	199,957	9,415
Keyera Corp.	Common	Shares	Setoguchi, Curtis Dean		5	12/31/2018	30	33.47	190,542	-9,415
Keyera Corp.	Common	Shares	Woodruff, Janet	Patricia	4	12/31/2018	30	33.09	578	25

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Kincora Copper Limited		Common Shares	Marks, Lewis		4	1/9/2019	46	0.155	40,258	32,258
Kontrol Energy Corp.		Common Shares	Del Vasto, Claudio		4	1/21/2019	97	0.6	708,735	100,000
Kontrol Energy Corp.		Common Shares	Lavereau, Kristian		5	1/21/2019	97	0.6	1,250,667	100,000
Labrador Iron Mines Holdings Limited		Common Shares	Kearney, John Francis		4, 5	1/25/2019	10	0.01	145,201	10,500
Labrador Iron Mines Holdings Limited		Common Shares	Kearney, John Francis		4, 5	1/30/2019	10	0.01	146,201	1,000
Labrador Iron Mines Holdings Limited		Common Shares	Kearney, John Francis		4, 5	1/31/2019	10	0.01	200,601	54,400
Largo Resources Ltd.		Common Shares	BRACE, WALLACE	DAVID	4	1/25/2019	51		57,727	15,000
Largo Resources Ltd.		Common Shares	BRACE, WALLACE	DAVID	4	1/25/2019	10	2.73	42,727	-15,000
Largo Resources Ltd.		Options	BRACE, WALLACE	DAVID	4	1/25/2019	51		473,000	-15,000
Leucrotta Inc.	Exploration	Common Shares	Brussa, John Albert		4	12/31/2018	30	1.68	452,365	2,784
Leucrotta Inc.	Exploration	Common Shares	Chicoine, Gregory	Nolan	5	12/31/2018	30	1.6782	502,118	25,920
Leucrotta Inc.	Exploration	Common Shares	Cochrane, Peter James Roy		5	12/31/2018	30	1.6782	698,966	25,920
Leucrotta Inc.	Exploration	Common Shares	Eckert, Helmut		5	1/28/2019	90	1.02	240,891	102,068
Leucrotta Inc.	Exploration	Common Shares	Eckert, Helmut		5	8/6/2014	00			
Leucrotta Inc.	Exploration	Common Shares	Eckert, Helmut		5	1/28/2019	90	1.02	63,499	63,499
Leucrotta Inc.	Exploration	Common Shares	Eckert, Helmut		5	1/28/2019	90	1.02	270,013	-46,457
Leucrotta Inc.	Exploration	Common Shares	Eckert, Helmut		5	1/28/2019	90	1.02	206,514	-63,499
Leucrotta Inc.	Exploration	Common Shares	Eckert, Helmut		5	1/28/2019	90	1.02	194,677	46,457
Leucrotta Inc.	Exploration	Common Shares	Eckert, Helmut		5	8/6/2014	00			
Leucrotta Inc.	Exploration	Common Shares	Eckert, Helmut		5	1/28/2019	90	1.02	63,499	63,499
Leucrotta Inc.	Exploration	Common Shares	Eckert, Helmut		5	12/31/2018	30	1.6782	644,521	25,920
Leucrotta Inc.	Exploration	Common Shares	Eckert, Helmut		5	1/28/2019	90	1.02	542,453	-102,068
Leucrotta Inc.	Exploration	Common Shares	Eckert, Helmut		5	1/28/2019	90	1.02	478,954	-63,499
Leucrotta Inc.	Exploration	Common Shares	Sereda, Douglas	Richard	5	12/31/2018	30	1.6782	901,706	27,171
Leucrotta Inc.	Exploration	Common Shares	Trudeau, Terry		5	12/31/2018	30	1.6782	1,220,205	32,772
Leucrotta Inc.	Exploration	Common Shares	Zakresky, Robert John		5	12/31/2018	30	1.6782	5,332,720	32,772
Libby K Industries Inc.		Common Shares	Kiesman, Robert Jalun		4, 5	7/5/2018	00			
Libby K Industries Inc.		Common Shares	Kiesman, Robert Jalun		4, 5	8/20/2018	11	0.05	599,999	599,999
Libby K Industries Inc.		Common Shares	Kiesman, Robert Jalun		4, 5	1/5/2019	11	0.05	600,000	1
Liberty Health Sciences Inc. (formerly, SecureCom Mobile Inc.)		Options	McKinnon, Ian Murray		4	1/18/2019	00			
Liberty Health Sciences Inc. (formerly, SecureCom Mobile Inc.)		Options	McKinnon, Ian Murray		4	1/24/2019	50		900,000	900,000
Loblaw Limited	Companies	Rights - Deferred Share Units	Pritchard, Beth Marie		4	11/1/2018	22			3,266
Loblaw Limited	Companies	Rights - Deferred Share Units	Pritchard, Beth Marie		4	11/1/2018	22		20,566	3,264
Loblaw Limited	Companies	Rights - Deferred Share Units	Raiss, Sarah		4	11/1/2018	22			5,828
Loblaw Limited	Companies	Rights - Deferred Share Units	Raiss, Sarah		4	11/1/2018	22		36,682	5,821

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Issuer Name		Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/ Disposed
Loblaw Limited	Companies	Rights - Deferred Share Units	Raiss, Sarah	4	12/31/2018	56			813
Loblaw Limited	Companies	Rights - Deferred Share Units	Raiss, Sarah	4	12/31/2018	56		37,674	814
Lomiko Metals Inc.		Common Shares	AJS Management Corp.	4	1/28/2019	99	0.05	2,439,300	380,550
Lomiko Metals Inc.		Common Shares	AJS Management Corp.	4	1/29/2019	10	0.045	0	-2,439,300
Lomiko Metals Inc.		Common Shares	Gill, Amrit Paul Singh	5	1/29/2019	11	0.045	4,699,910	2,439,300
Lomiko Metals Inc.		Common Shares	Gill, Amrit Paul Singh	5	1/31/2019	10	0.05	4,819,910	120,000
Lucky Minerals Inc.		stock options	Cozine, Steven Brandt	4	1/25/2019	50	0.2	300,000	100,000
Lucky Minerals Inc.		stock options	Perron, François	4	10/17/2017	00			
Lucky Minerals Inc.		stock options	Perron, François	4	1/24/2019	50	0.2	850,000	850,000
Lundin Gold Inc.		Common Shares	Lorito Holdings S.à.r.l.	3	1/28/2019	10	4.824	977,100	977,100
Lundin Gold Inc.		Common Shares	Zebra Holdings and Investments S.à.r.l.	3	1/28/2019	10	4.824	38,744,031	977,100
Lupaka Gold Corp.		Options	Bravo, Luis Felipe	5	2/1/2019	00			
Lupaka Gold Corp.		Options	Bravo, Luis Felipe	5	2/1/2019	50		500,000	500,000
LXRandCo, Inc. (formerly Gibraltar Growth Corporation)		Deferred Share Units	San Juan, Javier	4	1/30/2019	56		145,885	87,085
M2 Cobalt Corp.		Common Shares	Jervois Mining Limited	3	1/21/2019	00		16,282,040	
Madison Properties Inc.	Pacific	Non-Voting Class C Shares	Heung, Raymond	3	1/30/2019	10	3.27	6,756,717	-3,500
Madison Properties Inc.	Pacific	Non-Voting Class C Shares	Heung, Raymond	3	1/30/2019	10	3.26	6,756,117	-600
Madison Properties Inc.	Pacific	Non-Voting Class C Shares	Heung, Raymond	3	1/30/2019	10	3.25	6,737,217	-18,900
Madison Properties Inc.	Pacific	Non-Voting Class C Shares	Heung, Raymond	3	1/31/2019	10	3.27	6,736,817	-400
Madison Properties Inc.	Pacific	Non-Voting Class C Shares	Heung, Raymond	3	1/31/2019	10	3.26	6,735,617	-1,200
Madison Properties Inc.	Pacific	Non-Voting Class C Shares	Heung, Raymond	3	1/31/2019	10	3.25	6,712,217	-23,400
Mag One Products Inc.		Common Shares	Skalbania, Nelson Mathew	4	1/25/2019	10	0.105	1,610,000	-33,000
Mag One Products Inc.		Common Shares	Skalbania, Nelson Mathew	4	1/25/2019	10		697,700	-33,000
Maple Gold Mines Ltd. (formerly Aurvista Gold Corporation)		Options	Borthwick, Michelle	5	4/6/2018	00			
Maple Gold Mines Ltd. (formerly Aurvista Gold Corporation)		Options	Borthwick, Michelle	5	1/23/2019	50		450,000	450,000
Maple Gold Mines Ltd. (formerly Aurvista Gold Corporation)		Options	Broughton, David	4	1/23/2019	50		800,000	500,000
Maple Gold Mines Ltd. (formerly Aurvista Gold Corporation)		Options	Chmelauskas, Jay	4	1/23/2019	50	0.16	700,000	400,000
Maple Gold Mines Ltd. (formerly Aurvista Gold Corporation)		Options	Hornor, Brent Matthew	4, 5	1/23/2019	50		4,250,000	1,250,000
Maple Gold Mines Ltd. (formerly Aurvista Gold Corporation)		Options	Lang, Jones	5	1/23/2019	50		700,000	500,000
Maple Gold Mines Ltd. (formerly Aurvista Gold Corporation)		Options	North, Janine Marie	4	1/23/2019	50	0.16	800,000	500,000
Maple Gold Mines Ltd. (formerly Aurvista Gold Corporation)		Options	Orr, Gregg	5	1/23/2019	50		950,000	650,000
Maple Gold Mines Ltd. (formerly Aurvista Gold Corporation)		Options	Speidel, Friedrich	5	1/23/2019	50		925,000	675,000

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Maple Gold Mines Ltd. (formerly Aurvista Gold Corporation)		Options	Tagami, Maurice Alan		4	1/23/2019	50		800,000	500,000
Marathon Corporation	Gold	Common Shares	Spiteri, Joseph George		4	1/31/2019	51	0.32	329,050	50,000
Marathon Corporation	Gold	Options	Spiteri, Joseph George		4	1/31/2019	51	0.32	788,500	-50,000
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.3	1,900	1,900
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.31	3,100	1,200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.32	4,000	900
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.33	4,400	400
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.34	4,900	500
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.35	5,200	300
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.36	8,900	3,700
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.37	10,500	1,600
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.38	11,700	1,200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.39	14,200	2,500
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.4	20,600	6,400
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.41	24,500	3,900
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.415	24,600	100
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.42	29,000	4,400
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.425	29,200	200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.43	31,800	2,600
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.44	36,300	4,500
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.45	41,520	5,220
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.46	46,420	4,900
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.47	47,920	1,500
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.48	49,220	1,300
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38	12.49	49,420	200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/28/2019	38		0	-49,420
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.24	800	800
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.25	4,700	3,900
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.26	13,200	8,500
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.27	16,400	3,200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.275	16,700	300
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.28	22,300	5,600
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.29	23,600	1,300

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Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.3	25,300	1,700
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.305	25,400	100
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.31	28,100	2,700
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.32	30,700	2,600
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.33	35,300	4,600
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.34	37,300	2,000
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.35	39,600	2,300
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.36	43,700	4,100
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.37	44,300	600
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.38	44,500	200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.39	45,200	700
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.4	45,700	500
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.41	46,700	1,000
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.42	48,420	1,720
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.43	49,020	600
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38	12.44	49,420	400
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/29/2019	38		0	-49,420
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.27	200	200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.28	400	200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.29	3,100	2,700
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.3	5,800	2,700
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.31	9,000	3,200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.315	9,100	100
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.32	11,200	2,100
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.33	11,300	100
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.34	13,300	2,000
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.36	13,800	500
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.37	14,400	600
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.38	16,900	2,500
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.4	18,900	2,000
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.41	20,500	1,600
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.42	22,500	2,000
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.43	23,500	1,000

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Issuer Name		Security	Insider Name		Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/ Disposed
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.44	29,000	5,500
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.45	31,200	2,200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.46	35,800	4,600
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.47	39,800	4,000
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.48	42,600	2,800
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.49	45,300	2,700
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.5	45,500	200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.54	45,520	20
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.55	45,820	300
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.56	47,020	1,200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.57	47,220	200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38	12.58	49,420	2,200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/30/2019	38		0	-49,420
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.57	1,000	1,000
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.575	1,100	100
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.58	4,600	3,500
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.59	8,300	3,700
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.6	13,700	5,400
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.61	17,920	4,220
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.62	19,520	1,600
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.63	22,420	2,900
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.64	24,320	1,900
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.65	26,920	2,600
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.66	27,520	600
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.67	28,320	800
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.68	29,520	1,200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.69	30,420	900
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.7	33,820	3,400
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.71	34,620	800
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.72	35,420	800
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.73	36,720	1,300
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.74	37,120	400
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.75	38,220	1,100

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Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.76	38,420	200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.77	38,720	300
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.78	39,120	400
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.79	41,420	2,300
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.8	42,720	1,300
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.81	43,420	700
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.82	44,420	1,000
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.83	45,120	700
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.84	47,520	2,400
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.85	49,020	1,500
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38	12.86	49,420	400
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	1/31/2019	38		0	-49,420
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.26	1,700	1,700
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.27	1,900	200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.28	3,100	1,200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.29	7,200	4,100
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.295	8,100	900
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.3	13,100	5,000
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.31	15,500	2,400
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.32	19,800	4,300
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.33	22,000	2,200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.335	22,100	100
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.34	25,000	2,900
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.345	27,100	2,100
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.35	30,520	3,420
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.36	31,020	500
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.37	31,720	700
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.38	33,120	1,400
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.39	33,320	200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.41	34,320	1,000
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.42	34,820	500
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.44	36,020	1,200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.45	37,820	1,800

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Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.46	38,220	400
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.47	39,920	1,700
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.49	40,520	600
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.5	41,320	800
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.51	42,420	1,100
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.52	43,320	900
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.54	44,720	1,400
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.55	45,520	800
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.57	46,320	800
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.59	46,620	300
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.6	46,820	200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.61	47,120	300
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.62	49,020	1,900
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.65	49,220	200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38	12.4	49,420	200
Martinrea Inc.	International	Common Shares	Martinrea Inc.	International	1	2/1/2019	38		0	-49,420
Matica Enterprises Inc.		Options	Brown, George Andrew		4	8/23/2018	50	0.175	9,000,000	2,000,000
Matica Enterprises Inc.		Options	Ziger, Boris Ivan		4	8/23/2018	50		9,500,000	2,000,000
MBN Corporation		Units	MBN Corporation		1	1/25/2019	38	7.1619	1,600	1,600
MBN Corporation		Units	MBN Corporation		1	1/25/2019	38		0	-1,600
MBN Corporation		Units	MBN Corporation		1	1/28/2019	38	7.16	200	200
MBN Corporation		Units	MBN Corporation		1	1/28/2019	38		0	-200
MBN Corporation		Units	MBN Corporation		1	1/29/2019	38	7.1633	900	900
MBN Corporation		Units	MBN Corporation		1	1/29/2019	38		0	-900
MBN Corporation		Units	MBN Corporation		1	1/30/2019	38	7.1474	6,600	6,600
MBN Corporation		Units	MBN Corporation		1	1/30/2019	38		0	-6,600
MBN Corporation		Units	MBN Corporation		1	1/31/2019	38	7.0044	6,600	6,600
MBN Corporation		Units	MBN Corporation		1	1/31/2019	38		0	-6,600
MCAN Corporation	Mortgage	Common Shares	Horton, Robert		5	2/15/2018	30	17.953	6,565	40
MCAN Corporation	Mortgage	Common Shares	Horton, Robert		5	2/28/2018	30	18.231	6,604	39
MCAN Corporation	Mortgage	Common Shares	Horton, Robert		5	3/15/2018	30	17.89	6,645	41
MCAN Corporation	Mortgage	Common Shares	Horton, Robert		5	3/29/2018	30	17.379	6,786	141
MCAN Corporation	Mortgage	Common Shares	Horton, Robert		5	4/2/2018	30	17.651	6,828	42
MCAN Corporation	Mortgage	Common Shares	Horton, Robert		5	4/13/2018	30	17.78	6,869	41
MCAN Corporation	Mortgage	Common Shares	Horton, Robert		5	4/30/2018	30	18.13	6,909	40
MCAN Corporation	Mortgage	Common Shares	Horton, Robert		5	5/15/2018	30	18.13	6,949	40
MCAN Corporation	Mortgage	Common Shares	Horton, Robert		5	5/31/2018	30	18.05	6,990	41
MCAN Corporation	Mortgage	Common Shares	Horton, Robert		5	6/18/2018	30	18.153	7,030	40



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MCAN Corporation	Mortgage	Common Shares	Horton, Robert	5	6/29/2018	30	17.979	7,071	41
MCAN Corporation	Mortgage	Common Shares	Horton, Robert	5	6/29/2018	30	17.691	7,217	146
MCAN Corporation	Mortgage	Common Shares	Horton, Robert	5	7/13/2018	30	18.138	7,257	40
MCAN Corporation	Mortgage	Common Shares	Horton, Robert	5	8/7/2018	30	18.2	7,297	40
MCAN Corporation	Mortgage	Common Shares	Horton, Robert	5	8/31/2018	30	18.93	7,336	39
MCAN Corporation	Mortgage	Common Shares	Horton, Robert	5	9/12/2018	30	19.41	7,374	38
MCAN Corporation	Mortgage	Common Shares	Horton, Robert	5	9/14/2018	30	19.11	7,412	38
MCAN Corporation	Mortgage	Common Shares	Horton, Robert	5	9/27/2018	30	17.44	7,454	42
MCAN Corporation	Mortgage	Common Shares	Horton, Robert	5	9/28/2018	30	17.781	7,607	153
MCAN Corporation	Mortgage	Common Shares	Horton, Robert	5	10/15/2018	30	15.99	7,653	46
MCAN Corporation	Mortgage	Common Shares	Horton, Robert	5	10/30/2018	30	15.99	7,699	46
MCAN Corporation	Mortgage	Common Shares	Horton, Robert	5	11/14/2018	30	13.459	7,753	54
MCAN Corporation	Mortgage	Common Shares	Horton, Robert	5	11/29/2018	30	14.022	7,805	52
MCAN Corporation	Mortgage	Common Shares	Horton, Robert	5	12/13/2018	30	1.74	7,858	53
MCAN Corporation	Mortgage	Common Shares	Horton, Robert	5	1/2/2019	30	12.469	8,059	201
MCAN Corporation	Mortgage	Common Shares	Horton, Robert	5	1/14/2019	30	14.001	8,111	52
MCAN Corporation	Mortgage	Common Shares	Horton, Robert	5	1/23/2019	30	14.03	8,172	61
MCAN Corporation	Mortgage	Performance Deferred Share Units	Horton, Robert	5	6/29/2018	30	18.064	8,256	48
MCAN Corporation	Mortgage	Performance Deferred Share Units	Horton, Robert	5	6/29/2018	30	18.064	8,320	64
MCAN Corporation	Mortgage	Performance Deferred Share Units	Horton, Robert	5	6/29/2018	30	18.064	8,379	59
MCAN Corporation	Mortgage	Performance Deferred Share Units	Horton, Robert	5	9/28/2018	30	17.989	8,428	49
MCAN Corporation	Mortgage	Performance Deferred Share Units	Horton, Robert	5	9/28/2018	30	17.989	8,494	66
MCAN Corporation	Mortgage	Performance Deferred Share Units	Horton, Robert	5	9/28/2018	30	17.989	8,552	58
MCAN Corporation	Mortgage	Performance Deferred Share Units	Horton, Robert	5	1/2/2019	30	12.721	8,613	61
MCAN Corporation	Mortgage	Performance Deferred Share Units	Horton, Robert	5	1/2/2019	30	12.721	8,695	82
MCAN Corporation	Mortgage	Performance Deferred Share Units	Horton, Robert	5	1/2/2019	30	12.721	8,764	69
MCAN Corporation	Mortgage	Common Shares	Weaver, Karen H.	4	1/4/2018	30	17.4	533	11
MCAN Corporation	Mortgage	Common Shares	Weaver, Karen H.	4	4/3/2018	30	17.56	544	11
MCAN Corporation	Mortgage	Common Shares	Weaver, Karen H.	4	7/5/2018	30	17.93	555	11
MCAN Corporation	Mortgage	Common Shares	Weaver, Karen H.	4	10/2/2018	30	18.3	565	10
MCAN Corporation	Mortgage	Common Shares	Weaver, Karen H.	4	4/3/2018	30	17.56	49	1
MCAN Corporation	Mortgage	Common Shares	Weaver, Karen H.	4	7/5/2018	30	17.93	50	1
MCAN Corporation	Mortgage	Common Shares	Weaver, Karen H.	4	10/2/2018	30	18.3	51	1

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MCAN Corporation	Mortgage	Common Shares	Weaver, Karen H.		4	4/3/2018	30	17.56	5,682	118
MCAN Corporation	Mortgage	Common Shares	Weaver, Karen H.		4	7/5/2018	30	17.93	5,800	118
MCAN Corporation	Mortgage	Common Shares	Weaver, Karen H.		4	10/2/2018	30	18.3	5,920	120
McCoy Global Inc.		Common Shares	Deng, Bing		5	1/22/2018	00			
McCoy Global Inc.		Common Shares	Deng, Bing		5	1/22/2018	00		18,592	
McCoy Global Inc.		Common Shares	Deng, Bing		5	1/22/2018	00			
McCoy Global Inc.		Common Shares	Deng, Bing		5	1/22/2018	00			
Melcor Ltd.	Developments	Common Shares	Melcor Ltd.	Developments	1	1/28/2019	38	12.891	22,030	1,262
Melcor Ltd.	Developments	Common Shares	Melcor Ltd.	Developments	1	1/29/2019	38	12.997	23,292	1,262
Melcor Ltd.	Developments	Common Shares	Melcor Ltd.	Developments	1	1/30/2019	38	12.922	24,554	1,262
Melcor Ltd.	Developments	Common Shares	Melcor Ltd.	Developments	1	1/31/2019	38	12.9	25,754	1,200
Melcor Ltd.	Developments	Common Shares	Melcor Ltd.	Developments	1	2/1/2019	38	12.884	27,016	1,262
Metallic Minerals Corp.		Common Shares	Harris, William Glen		4	1/28/2019	10	0.165	1,738,200	2,000
Metal Manufacturing Inc. (formerly Muskrat Minerals Incorporated)		Common Shares	Hennigar, David John		4, 5	2/1/2019	45	0.285	2,383,149	87,719
Metal Manufacturing Inc. (formerly Muskrat Minerals Incorporated)		Common Shares	MacKenzie, Francis		4	1/31/2019	10	0.32	1,151,848	500
Metal Manufacturing Inc. (formerly Muskrat Minerals Incorporated)		Common Shares	MacKenzie, Francis		4	1/31/2019	10	0.3	1,152,848	1,000
Metro inc.		Options	Allaire, Martin		5	1/31/2019	50	47.51	40,300	6,300
Metro inc.		Performance Share Unit (PSU) / Unité d'actions au rendement	Allaire, Martin		5	1/31/2019	56	47.51	9,330	2,210
Metro inc.		Options	Bacon, Marie-Claude		5	1/31/2019	50	47.51	12,700	3,100
Metro inc.		Performance Share Unit (PSU) / Unité d'actions au rendement	Bacon, Marie-Claude		5	1/31/2019	56	47.51	5,820	1,290
Metro inc.		Options	Bich, Geneviève		5	1/31/2019	50	47.51	64,800	6,800
Metro inc.		Performance Share Unit (PSU) / Unité d'actions au rendement	Bich, Geneviève		5	1/31/2019	56	47.51	15,180	4,100
Metro inc.		Options	Boulanger, Serge		5	1/31/2019	50	47.51	85,520	7,900
Metro inc.		Performance Share Unit (PSU) / Unité d'actions au rendement	Boulanger, Serge		5	1/31/2019	56	47.51	18,590	4,740
Metro inc.		Options	Bourbonnière, Christian		5	1/31/2019	50	47.51	188,700	19,300
Metro inc.		Performance Share Unit (PSU) / Unité d'actions au rendement	Bourbonnière, Christian		5	1/31/2019	56	47.51	38,873	11,050
Metro inc.		Options	Desjarlais, Mireille		5	1/31/2019	50	47.51	18,800	3,600
Metro inc.		Performance Share Unit (PSU) / Unité d'actions au rendement	Desjarlais, Mireille		5	1/31/2019	56	47.51	6,000	1,470
Metro inc.		Options	Fortino, Carmine		5	1/31/2019	50	47.51	146,900	21,200
Metro inc.		Performance Share Unit (PSU) / Unité d'actions au rendement	Fortino, Carmine		5	1/31/2019	56	47.51	49,630	20,100
Metro inc.		Options	Legault, Frédéric		5	1/31/2019	50	47.51	33,100	6,300

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Metro inc.		Performance Unit (PSU) / Share d'actions au rendement	Legault, Frédéric	5	1/31/2019	56	47.51	9,110	2,210
Metro inc.		Options	RICHER LA FLÈCHE, ERIC	4, 5	1/31/2019	50	47.51	1,137,400	105,200
Metro inc.		Performance Unit (PSU) / Share d'actions au rendement	RICHER LA FLÈCHE, ERIC	4, 5	1/31/2019	56	47.51	129,020	31,570
Metro inc.		Options	Rivet, Simon	5	1/31/2019	50	47.51	61,900	6,300
Metro inc.		Performance Unit (PSU) / Share d'actions au rendement	Rivet, Simon	5	1/31/2019	56	47.51	8,680	2,210
Metro inc.		Options	Sbrugnera, Roberto	5	1/31/2019	50	47.51	27,300	3,100
Metro inc.		Performance Unit (PSU) / Share d'actions au rendement	Sbrugnera, Roberto	5	1/31/2019	56	47.51	5,820	1,290
Metro inc.		Options	Thibault, François	5	1/31/2019	50	47.51	238,000	19,300
Metro inc.		Performance Unit (PSU) / Share d'actions au rendement	Thibault, François	5	1/31/2019	56	47.51	45,580	11,050
Metro inc.		Options	Vézina, Yves	5	1/31/2019	50	47.51	79,900	6,300
Metro inc.		Performance Unit (PSU) / Share d'actions au rendement	Vézina, Yves	5	1/31/2019	56	47.51	9,330	2,210
Middlefield Healthcare & Wellness Dividend Fund		Trust Units	Middlefield Healthcare & Wellness Dividend Fund	1	1/28/2019	38	10.3	5,390,959	600
Middlefield Healthcare & Wellness Dividend Fund		Trust Units	Middlefield Healthcare & Wellness Dividend Fund	1	1/30/2019	38	10.25	5,392,259	1,300
Middlefield Healthcare & Wellness Dividend Fund		Trust Units	Middlefield Healthcare & Wellness Dividend Fund	1	1/31/2019	38	10.333	5,392,859	600
Midland Exploration Inc.		Common Shares	Masson, Mario	5	1/28/2019	51	0.6	150,000	20,000
Midland Exploration Inc.		Options	Masson, Mario	5	1/28/2019	51	0.6	355,000	-20,000
Minera Alamos Inc.		Common Shares	Millar, Chester F.	4	1/22/2019	10	0.1	1,689,750	-25,000
Minera Alamos Inc.		Common Shares	Millar, Chester F.	4	1/28/2019	10	0.1046	1,314,750	-375,000
Minera Alamos Inc.		Common Shares	Ramshaw, William Douglas	4, 5	1/28/2019	10	0.105	3,407,200	250,000
Minera Alamos Inc.		Common Shares	Ramshaw, William Douglas	4, 5	2/1/2019	50	0.11		50,000
Minera Alamos Inc.		Common Shares	Ramshaw, William Douglas	4, 5	2/1/2019	10	0.11	3,457,200	50,000
Minnova Corp		Common Shares	Glenn, Gorden	4	1/28/2019	70	0.38		-350,000
Minnova Corp		Common Shares	Glenn, Gorden	4	1/28/2019	70	0.38		-350,000
Minnova Corp		Common Shares	Glenn, Gorden	4	1/28/2019	51	0.38	352,000	350,000
Minnova Corp		Options	Glenn, Gorden	4	1/28/2019	11		291,436	-350,000
Miramont Corp.	Resources	Common Shares	Hennigh, Quinton Todd	4	1/31/2019	11	0.35	1,219,600	70,000
Miramont Corp.	Resources	Warrants	Hennigh, Quinton Todd	4	11/14/2017	00			
Miramont Corp.	Resources	Warrants	Hennigh, Quinton Todd	4	1/31/2019	11	0.5	70,000	70,000
Miramont Corp.	Resources	Common Shares	Pincus, William	4, 5	1/31/2019	11	0.35	1,163,775	57,142
Miramont Corp.	Resources	Warrants	Pincus, William	4, 5	1/31/2019	11	0.5	640,475	57,142
MJardin Group, Inc. (formerly, Sumtra Diversified Inc.)		Options	Brown, Arthur	5	11/14/2018	50	12		30,000

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MJardin Group, Inc. (formerly, Sumtra Diversified Inc.)	Options	Brown, Arthur	5	11/14/2018	50		30,000	30,000
MJardin Group, Inc. (formerly, Sumtra Diversified Inc.)	Options	Franz, Benjamin	5	11/14/2018	50	12		175,000
MJardin Group, Inc. (formerly, Sumtra Diversified Inc.)	Options	Franz, Benjamin	5	11/14/2018	50		175,000	175,000
MJardin Group, Inc. (formerly, Sumtra Diversified Inc.)	Options	Gautam, Rishi	4, 5	11/14/2018	50	12		50,000
MJardin Group, Inc. (formerly, Sumtra Diversified Inc.)	Options	Gautam, Rishi	4, 5	11/14/2018	50		50,000	50,000
MJardin Group, Inc. (formerly, Sumtra Diversified Inc.)	Options	Kocur, Roman	4	11/14/2018	50	12		50,000
MJardin Group, Inc. (formerly, Sumtra Diversified Inc.)	Options	Kocur, Roman	4	11/14/2018	50		50,000	50,000
MJardin Group, Inc. (formerly, Sumtra Diversified Inc.)	Options	Marr, Graham	4	11/14/2018	50	12		50,000
MJardin Group, Inc. (formerly, Sumtra Diversified Inc.)	Options	Marr, Graham	4	11/14/2018	50		50,000	50,000
MJardin Group, Inc. (formerly, Sumtra Diversified Inc.)	Options	Nardulli, Massimiliano	5	11/14/2018	50	12		100,000
MJardin Group, Inc. (formerly, Sumtra Diversified Inc.)	Options	Nardulli, Massimiliano	5	11/14/2018	50		100,000	100,000
MJardin Group, Inc. (formerly, Sumtra Diversified Inc.)	Options	Seto, Chris	5	12/31/2018	50	6.67		50,000
MJardin Group, Inc. (formerly, Sumtra Diversified Inc.)	Options	Seto, Chris	5	12/31/2018	50		50,000	50,000
MJardin Group, Inc. (formerly, Sumtra Diversified Inc.)	Common Shares	Travaglini, Francis	John	4	11/13/2018	00	508,305	
MJardin Group, Inc. (formerly, Sumtra Diversified Inc.)	Options	Travaglini, Francis	John	4	11/14/2018	50	12	50,000
MJardin Group, Inc. (formerly, Sumtra Diversified Inc.)	Options	Travaglini, Francis	John	4	11/14/2018	50	50,000	50,000
Mogo Finance Technology Inc.	Common Shares	Wekerle, Michael A.	3	2/1/2019	10	3	2,549,163	100,000
Morguard Real Estate Investment Trust	Units	King, David	6	1/31/2001	00		16,875	
Morguard Real Estate Investment Trust	Units	King, David	6	10/19/2004	51	8	26,875	10,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	12/31/2018	38	0.47	238,500	3,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	1/2/2019	38		0	-3,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	1/4/2019	38	0.47	22,000	22,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	1/4/2019	38	0.47	40,000	18,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	1/4/2019	38	0.45	47,000	7,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	1/4/2019	38	0.45	72,000	25,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	1/7/2019	38	0.46	76,000	4,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	1/8/2019	38	0.46	76,500	500
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	1/10/2019	38	0.47	77,500	1,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	1/14/2019	38	0.49	78,000	500
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	1/16/2019	38	0.49	103,000	25,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	1/19/2019	38	0.49	122,000	19,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	1/23/2019	38	0.5	137,500	15,500

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Morien Resources Corp.	Common Shares	Morien Resources Corp	1	1/25/2019	38	0.5	144,500	7,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	1/28/2019	38	0.5	169,500	25,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	1/28/2019	38	0.5	172,000	2,500
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	1/28/2019	38	0.5	197,000	25,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	1/29/2019	38	0.48	207,000	10,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	2/1/2019	38		185,000	-22,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	2/1/2019	38		167,000	-18,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	2/1/2019	38		160,000	-7,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	2/1/2019	38		135,000	-25,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	2/1/2019	38		131,000	-4,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	2/1/2019	38		130,500	-500
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	2/1/2019	38		129,500	-1,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	2/1/2019	38		110,500	-19,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	2/1/2019	38		110,000	-500
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	2/1/2019	38		85,000	-25,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	2/1/2019	38		69,500	-15,500
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	2/1/2019	38		62,500	-7,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	2/1/2019	38		37,500	-25,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	2/1/2019	38		35,000	-2,500
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	2/1/2019	38		10,000	-25,000
Morien Resources Corp.	Common Shares	Morien Resources Corp	1	2/1/2019	38		0	-10,000
MYM Nutraceuticals Inc.	Options	Steinberg, Howard	4, 5	2/1/2019	50	0.79	5,000,000	2,000,000
Namaste Technologies Inc. (formerly Next Gen Metals Inc.)	Common Shares	Dollinger, Sefi	5	1/28/2019	10	1.59	1,141,721	-10,000
NameSilo Technologies Corp (formerly known as Brisio Innovations Inc.)	Common Shares	Andreola, Gianpaolo Fabrisio	4	1/31/2019	10	0.34	3,555,100	7,500
NameSilo Technologies Corp (formerly known as Brisio Innovations Inc.)	Common Shares	Andreola, Gianpaolo Fabrisio	4	2/1/2019	10	0.345	2,009,366	23,000
NameSilo Technologies Corp (formerly known as Brisio Innovations Inc.)	Common Shares	Andreola, Gianpaolo Fabrisio	4	2/1/2019	10	0.34	2,109,366	100,000
NameSilo Technologies Corp (formerly known as Brisio Innovations Inc.)	Common Shares	Andreola, Gianpaolo Fabrisio	4	2/1/2019	10	0.33	2,141,366	32,000
NameSilo Technologies Corp (formerly known as Brisio Innovations Inc.)	Common Shares	Malberg, Miko	3	1/29/2019	00			
NameSilo Technologies Corp (formerly known as Brisio Innovations Inc.)	Common Shares	Malberg, Miko	3	1/29/2019	00		1,000,000	
NameSilo Technologies Corp (formerly known as Brisio Innovations Inc.)	Common Shares	Malberg, Miko	3	1/19/2019	00			
NameSilo Technologies Corp (formerly known as Brisio Innovations Inc.)	Common Shares	Malberg, Miko	3	1/29/2019	00		487,500	
NameSilo Technologies Corp (formerly known as Brisio Innovations Inc.)	Common Shares	Malberg, Miko	3	1/29/2019	00		4,409,500	
NameSilo Technologies Corp (formerly known as Brisio Innovations Inc.)	Common Shares	Malberg, Miko	3	1/19/2019	00			
NameSilo Technologies Corp (formerly known as Brisio Innovations Inc.)	Common Shares	Malberg, Miko	3	1/29/2019	00		4,187,500	
Nanotech Security Corp.	Common Shares	Blakeway, Douglas Hayward	4	1/29/2019	57	0.62	6,307,500	187,500
Nanotech Security Corp.	Rights Deferred Share Units	Blakeway, Douglas Hayward	4	1/29/2019	57	0.62	0	-187,500
NanoXplore Inc.	Options	Gascon, Benoît	4	1/30/2019	50	1.41	180,133	100,000
National Bank of Canada	Common Shares	Banque Nationale du Canada	1	1/7/2019	38	56.5	200	200

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National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.51	300	100
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.52	400	100
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.53	600	200
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.54	700	100
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.56	1,000	300
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.58	1,200	200
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.59	1,800	600
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.6	2,200	400
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.61	2,600	400
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.63	2,800	200
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.64	3,400	600
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.65	3,800	400
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.66	3,900	100
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.67	4,500	600
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.68	4,900	400
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.69	5,500	600
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.7	5,800	300
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.71	6,000	200
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.72	7,300	1,300
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.73	8,700	1,400
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.74	9,100	400
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.75	10,000	900
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.76	10,600	600
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.77	13,000	2,400
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.78	13,600	600
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.79	13,900	300
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.8	15,000	1,100
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.81	15,600	600
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.815	15,700	100
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.82	16,300	600
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.83	17,000	700
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.84	17,300	300
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.85	17,500	200

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National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.87	18,000	500
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.88	19,500	1,500
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.885	20,000	500
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.89	20,300	300
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.9	20,400	100
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.93	20,600	200
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.95	20,700	100
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.96	21,100	400
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.97	21,400	300
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	56.99	21,600	200
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57	21,800	200
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.01	22,100	300
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.03	22,200	100
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.06	22,500	300
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.08	22,800	300
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.13	23,300	500
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.14	23,400	100
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.15	23,800	400
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.16	24,200	400
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.17	24,400	200
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.18	24,800	400
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.2	25,100	300
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.21	25,600	500
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.22	26,200	600
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.23	26,600	400
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.24	27,200	600
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.245	27,300	100
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.25	27,900	600
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.26	28,200	300
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.27	29,600	1,400
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.28	30,400	800
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.29	32,700	2,300
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.3	34,900	2,200

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National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.31	37,200	2,300
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.315	37,400	200
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.32	40,100	2,700
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.325	40,900	800
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.33	42,700	1,800
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.335	42,900	200
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.34	44,100	1,200
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.35	45,400	1,300
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.36	46,800	1,400
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.37	47,500	700
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.38	48,300	800
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.39	48,800	500
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.4	49,300	500
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.43	49,800	500
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/7/2019	38	57.47	50,000	200
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.78	50,800	800
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.79	51,100	300
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.8	51,900	800
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.81	52,100	200
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.82	52,200	100
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.83	52,800	600
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.84	53,000	200
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.85	53,500	500
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.86	54,100	600
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.87	54,400	300
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.88	55,700	1,300
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.89	56,800	1,100
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.9	58,000	1,200
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.91	58,800	800
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.92	60,700	1,900
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.93	62,400	1,700
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.94	63,100	700
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.95	64,300	1,200



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National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.96	65,900	1,600
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.97	66,900	1,000
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.975	67,000	100
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.98	68,100	1,100
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	56.99	69,500	1,400
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57	70,100	600
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.01	70,200	100
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.03	70,600	400
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.04	71,100	500
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.05	71,800	700
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.07	72,500	700
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.11	72,700	200
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.12	72,900	200
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.13	73,100	200
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.14	73,500	400
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.15	74,100	600
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.17	74,500	400
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.18	74,700	200
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.19	75,200	500
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.22	75,400	200
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.24	75,500	100
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.25	75,800	300
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.26	76,100	300
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.27	77,100	1,000
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.28	78,100	1,000
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.29	78,200	100
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.3	79,200	1,000
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.31	80,300	1,100
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.32	80,900	600
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.33	82,500	1,600
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.335	82,600	100
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.34	83,500	900
National Canada	Bank	of	Common Shares	Banque	Nationale	du	1	1/8/2019	38	57.35	85,000	1,500

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National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.36	88,500	3,500
National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.365	89,300	800
National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.37	92,200	2,900
National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.375	92,500	300
National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.38	93,400	900
National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.39	94,500	1,100
National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.4	95,400	900
National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.41	96,500	1,100
National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.43	97,800	1,300
National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.47	98,000	200
National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.49	98,100	100
National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.54	98,300	200
National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.55	98,600	300
National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.57	98,800	200
National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.58	99,000	200
National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.6	99,300	300
National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.61	99,400	100
National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.68	99,500	100
National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.725	99,600	100
National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.73	99,700	100
National Canada	Bank	of	Common Shares	Banque Nationale du Canada			1	1/8/2019	38	57.77	100,000	300
Nautilus Minerals Inc.			Warrants	Deep Sea Mining Finance Ltd.			3	1/17/2019	00		75,171,816	
Nevada Corporation	Zinc		Common Shares	Norvista Capital Corporation			3	1/28/2019	10	0.095	2,741,094	5,000
Nevsun Resources Ltd.			Common Shares	1178180 B.C. Ltd.			3	1/23/2019	22	6		218,248
Nevsun Resources Ltd.			Common Shares	1178180 B.C. Ltd.			3	1/23/2019	22	6	286,565,810	218,248
Nevsun Resources Ltd.			Common Shares	Zijin Mining Group Co., Ltd.			3	1/23/2019	22	6	286,565,810	218,248
New Look Vision Group Inc. (formerly New Look Eyewear Inc.)			Common Class A Shares	Chicoyne, Denyse			4	1/15/2019	00			
New Look Vision Group Inc. (formerly New Look Eyewear Inc.)			Common Class A Shares	Matuszewski, Pierre			4	5/10/2018	00			
New Look Vision Group Inc. (formerly New Look Eyewear Inc.)			Common Class A Shares	Pearson, Emmett	Charles		4, 6	12/31/2018	35	28.63		652
New Look Vision Group Inc. (formerly New Look Eyewear Inc.)			Common Class A Shares	Pearson, Emmett	Charles		4, 6	12/31/2018	35	28.63	125,177	651
New Point Exploration Corp.			Common Shares without par value	Greenway, Charles	David		4	1/24/2019	10	0.1	154,500	20,000
New Point Exploration Corp.			Common Shares without par value	Greenway, Charles	David		4	1/28/2019	10	0.1	293,000	138,500

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New Point Exploration Corp.	Common Shares without par value	Greenway, Charles	4	1/29/2019	10	0.1	318,000	25,000
New Point Exploration Corp.	Common Shares without par value	Greenway, Charles	4	1/30/2019	10	0.085	318,500	500
New Point Exploration Corp.	Options transferable Non-stock options	Ryan, John Patrick	4	1/18/2019	00		75,000	
Nexa Resources S.A. (formerly, VM Holding S.A.)	Common Shares	Nexa Resources SA	1	1/28/2019	38	9.1125	274,123	43,799
NexgenRx Inc.	Common Shares	Crossett, Paul Everett	3	1/31/2019	10	0.28	6,676,500	1,500
NexgenRx Inc.	Common Shares	Crossett, Paul Everett	3	2/1/2019	10	0.28	6,684,500	8,000
Nexus Real Estate Investment Trust	Trust Units	Cutsey, Bradley	4	1/24/2019	46	1.8766	21,646	5,279
Nexus Real Estate Investment Trust	Trust Units	Forgione, Mario	4	1/24/2019	46	1.8766	1,438,718	3,854
Nexus Real Estate Investment Trust	Trust Units	Jacobson, Lorne	4	1/24/2019	46	1.8766	67,748	5,265
Nexus Real Estate Investment Trust	Trust Units	Lagopoulos, Nicholas Alexander	4	1/24/2019	46	1.8766	80,657	4,592
Nexus Real Estate Investment Trust	Trust Units	Rodney, Benjamin Ryan	4	1/24/2019	46	1.877	102,214	3,854
NGEx Resources Inc.	Common Shares	Lorito Holdings S.à.r.l.	3	1/31/2019	16	1	24,500,000	5,056,000
NGEx Resources Inc.	Common Shares	Zebra Holdings and Investments S.à.r.l.	3	1/31/2019	16	1	64,553,436	7,056,000
Nighthawk Gold Corp.	Common Shares	Cudney, Robert Douglas	3	1/22/2019	10	0.37	31,255,189	248,500
Nighthawk Gold Corp.	Common Shares	Cudney, Robert Douglas	3	1/24/2019	10	0.3622	31,616,689	361,500
Nighthawk Gold Corp.	Common Shares	Cudney, Robert Douglas	3	1/28/2019	10	0.365	32,916,689	1,300,000
Nighthawk Gold Corp.	Common Shares	Cudney, Robert Douglas	3	1/28/2019	10	0.4056	32,941,689	25,000
Nighthawk Gold Corp.	Common Shares	Prychidny, Morris	4	1/28/2019	10	0.41	769,975	75,000
NioBay Metals Inc. (formerly MDN INC.)	Common Shares	Dufresne, Claude	4, 5	1/31/2019	10	0.21	361,700	20,000
North Bud Farms Inc.	Common Shares	Brown, Ryan	4, 5	1/22/2019	10	0.23	1,406,441	5,000
North Bud Farms Inc.	Common Shares	Brown, Ryan	4, 5	1/22/2019	10	0.25	1,410,941	4,500
North Bud Farms Inc.	Common Shares	Brown, Ryan	4, 5	1/22/2019	10	0.235	1,415,941	5,000
North Bud Farms Inc.	Common Shares	Brown, Ryan	4, 5	1/22/2019	10	0.245	1,422,441	6,500
North Bud Farms Inc.	Common Shares	Brown, Ryan	4, 5	1/22/2019	10	0.24	1,427,441	5,000
North Bud Farms Inc.	Common Shares	Brown, Ryan	4, 5	1/23/2019	10	0.23	1,437,941	10,500
NORTHERN LIGHTS RESOURCES CORP.	Common Shares	Bahnsen, Jason	4, 5	2/1/2019	10	0.04	1,349,000	10,000
Obsidian Energy Ltd.	Common Shares	French, David	4, 5	12/31/2018	30	1.23	437,323	55,423
Obsidian Energy Ltd.	Common Shares	French, David	4, 5	12/31/2018	30	1.23	39,816	18,479
Obsidian Energy Ltd.	Common Shares	Hendry, David Warren	5	12/31/2018	30	1.23	219,720	53,569
Obsidian Energy Ltd.	Common Shares	Hodgson, Mark Alan	5	12/31/2018	30	1.23		51,155
Obsidian Energy Ltd.	Common Shares	Hodgson, Mark Alan	5	12/31/2018	30	1.23	85,734	51,155
Obsidian Energy Ltd.	Common Shares	Loukas, Stephen	4	1/28/2019	90		52,005	-4,503,400
Obsidian Energy Ltd.	Common Shares	Smith, Aaron	5	7/9/2018	00			
Obsidian Energy Ltd.	Common Shares	Smith, Aaron	5	12/31/2018	30	1.03	2,234	2,234
Obsidian Energy Ltd.	Common Shares	Smith, Aaron	5	7/9/2018	00			
Obsidian Energy Ltd.	Common Shares	Smith, Aaron	5	12/31/2018	30	1.03	4,469	4,469
Obsidian Energy Ltd.	Common Shares	Sweerts, Andrew Francis	5	12/31/2018	30	1.31	186,625	16,538
Oceanus Resources Corporation	Options	Gordon, Richard Basil	4, 5	2/3/2019	52	0.4	1,168,334	41,667
Olympia Financial Group Inc.	Common Shares	Bahnuik, Jonathan Marvin	5	1/28/2019	30	41.012	1,238	26
Oncolytics Biotech Inc.	Common Shares	Coffey, Matthew	4, 5	12/21/2018	10	1.742		12,500
Oncolytics Biotech Inc.	Common Shares	Coffey, Matthew	4, 5	12/21/2018	99	1.7266	36,623	1,250

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ONEX CORPORATION	Subordinate Shares	Voting	Heersink, Ewout R.	4, 5	1/31/2019	47		32,617	-675
Orezone Corporation	Gold	Common Shares	Archambeault, Louis	5	1/31/2019	00		154,300	
Orezone Corporation	Gold	Options	Archambeault, Louis	5	1/31/2019	00		250,000	
Orezone Corporation	Gold	Options	Batt, Ronald	4	1/31/2019	52	0.65	825,000	-150,000
Orezone Corporation	Gold	Common Shares	Downey, Patrick	4	1/31/2019	10	0.51	3,030,000	40,000
Orezone Corporation	Gold	Common Shares	Downey, Patrick	4	1/31/2019	10	0.51	3,048,000	18,000
Orezone Corporation	Gold	Options	Downey, Patrick	4	1/31/2019	52	0.65	2,175,000	-150,000
Orezone Corporation	Gold	Common Shares	Halvorson, Michael	4	1/23/2019	51	0.36	3,159,113	150,000
Orezone Corporation	Gold	Common Shares	Halvorson, Michael	4	1/23/2019	51	0.4	3,459,113	300,000
Orezone Corporation	Gold	Options	Halvorson, Michael	4	1/23/2019	51	0.36	1,225,000	-150,000
Orezone Corporation	Gold	Options	Halvorson, Michael	4	1/23/2019	51	0.4	925,000	-300,000
Orezone Corporation	Gold	Options	Halvorson, Michael	4	1/30/2019	52	0.65	775,000	-150,000
Orezone Corporation	Gold	Options	Marquis, Pascal	5	1/31/2019	52	0.65	1,550,000	-200,000
Orezone Corporation	Gold	Options	McCoy, Joseph	5	1/31/2019	52	0.65	925,000	-15,000
Orezone Corporation	Gold	Options	Oussen, Derra	7	1/31/2019	52	0.65	380,000	-75,000
Organigram Holdings Inc. (formerly, Inform Exploration Corp.)	Common Shares		Bourque, Michel	4	1/30/2019	10	0.74	47,000	-36,057
Organigram Holdings Inc. (formerly, Inform Exploration Corp.)	Common Shares		Bourque, Michel	4	1/30/2019	10	7.4503	0	-47,000
Organigram Holdings Inc. (formerly, Inform Exploration Corp.)	Common Shares		De Luca, Paolo	5	1/30/2019	10	7.42	10,000	6,000
Organto Foods Inc.	Options		Klenda, Jeffrey T.	4	1/28/2019	50	0.135	1,250,000	300,000
Organto Foods Inc.	Options		Langner, Ralf	5	1/1/2018	00			
Organto Foods Inc.	Options		Langner, Ralf	5	1/28/2019	50		350,000	350,000
Osisko Mining Inc.	Common Shares		Burzynski, John Feliks	4, 5	1/24/2019	11	2.6	2,060,967	-250,000
Osisko Mining Inc.	Common Shares		Burzynski, John Feliks	4, 5	1/28/2019	10	2.717	2,010,967	-50,000
Osisko Mining Inc.	Common Shares		Burzynski, John Feliks	4, 5	1/29/2019	10	2.698	1,960,967	-50,000
Osisko Mining Inc.	Common Shares		Burzynski, John Feliks	4, 5	1/29/2019	10	2.7	1,937,467	-23,500
Osisko Mining Inc.	Common Shares		Burzynski, John Feliks	4, 5	1/31/2019	10	2.686	1,910,967	-26,500
Osisko Mining Inc.	Common Shares		Gaumont, André	6	1/21/2019	54	1.44	307,310	83,350
Osisko Mining Inc.	Common Shares		Gaumont, André	6	1/23/2019	54	1.44	83,350	83,350
Osisko Mining Inc.	Warrants 2016		Gaumont, André	6	1/21/2019	54	1.44	0	-83,350
Osisko Mining Inc.	Warrants 2016		Gaumont, André	6	1/23/2019	54	1.44	0	-83,350
Osisko Mining Inc.	Common Shares		Vizquerra, Jose	5	1/30/2019	54	1.44	5,107,135	834,000
Osisko Mining Inc.	Warrants		Vizquerra, Jose	5	1/30/2019	54	1.44	554,917	-834,000
Pacific Empire Minerals Corp.	Common Shares		Peters, Bradley	4, 5	1/23/2019	10	0.06	1,058,500	5,000
Palamina Corp.	Common Shares		Thomson, Andrew	4	1/28/2019	10	0.31	1,401,369	2,500
Palamina Corp.	Common Shares		Thomson, Andrew	4	1/29/2019	10	0.31	219,016	2,000
Palamina Corp.	Common Shares		Thomson, Andrew	4	2/1/2019	10	0.27	351,584	35,500
Pancontinental Resources Corporation	Common Shares		Croft, Thomas Layton	4	2/1/2019	10	0.045	2,030,000	100,000
Parex Resources Inc.	Common Shares		Bartlett, Curtis Darrell	4	1/1/2019	90		0	-1,000,000
Parex Resources Inc.	Common Shares		Bartlett, Curtis Darrell	4	11/6/2009	00			
Parex Resources Inc.	Common Shares		Bartlett, Curtis Darrell	4	1/1/2019	90		1,000,000	1,000,000
People Corporation	Common Shares		Canning, Brevan	5	1/29/2019	57	8.15	914,420	8,290

**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
People Corporation	Rights Restricted Stock Units	Canning, Brevan	5	1/29/2019	57	3.59	45,151	-16,713
People Corporation	Common Shares	Chwartacki, Bonnie	5	1/29/2019	57	8.15	1,335,554	9,326
People Corporation	Rights Restricted Stock Units	Chwartacki, Bonnie	5	1/29/2019	57	3.59	46,652	-18,802
People Corporation	Common Shares	Goldberg, Laurie Marc	3, 4, 5	1/29/2019	57	8.15	181,693	18,652
People Corporation	Rights Restricted Stock Units	Goldberg, Laurie Marc	3, 4, 5	1/29/2019	57	3.59	90,533	-37,604
People Corporation	Common Shares	Stewner, Dennis Douglas	5	1/29/2019	57	8.15	90,497	4,063
People Corporation	Rights Restricted Stock Units	Stewner, Dennis Douglas	5	1/29/2019	57	2.87	42,133	-8,190
People Corporation	Common Shares	Villani, Lisa Dawn	5	1/29/2019	57	8.15	12,606	5,829
People Corporation	Rights Restricted Stock Units	Villani, Lisa Dawn	5	1/29/2019	57	3.59	33,953	-12,535
Perpetual Energy Inc.	Common Shares	Ward, Howard	4	3/24/2016	37			-44,873
Perpetual Energy Inc.	Common Shares	Ward, Howard	4	3/24/2016	37			-44,876
Perpetual Energy Inc.	Common Shares	Ward, Howard	4	3/24/2016	37		2,361	-44,874
Perpetual Energy Inc.	Common Shares	Ward, Howard	4	3/24/2016	37			-15,803
Perpetual Energy Inc.	Common Shares	Ward, Howard	4	3/24/2016	37		831	-15,804
Perpetual Energy Inc.	Common Shares	Ward, Howard	4	3/24/2016	37			-169,281
Perpetual Energy Inc.	Common Shares	Ward, Howard	4	3/24/2016	37		8,909	-169,282
Phivida Holdings Inc.	Common Shares	Belfontaine, John David Alexander	3	1/29/2019	10	0.5	2,524,040	-10,000
Phivida Holdings Inc.	Common Shares	Belfontaine, John David Alexander	3	1/30/2019	10	0.51	2,514,040	-10,000
Phivida Holdings Inc.	Common Shares	Belfontaine, John David Alexander	3	1/31/2019	10	0.58	2,489,040	-25,000
Phivida Holdings Inc.	Common Shares	Belfontaine, John David Alexander	3	1/31/2019	10	0.56	2,457,420	-31,620
Phivida Holdings Inc.	Common Shares	Belfontaine, John David Alexander	3	1/31/2019	10	0.54	2,430,420	-27,000
Phivida Holdings Inc.	Common Shares	Belfontaine, John David Alexander	3	2/1/2019	10	0.5505	2,270,420	-160,000
Pine Cliff Energy Ltd.	Common Shares	Disbrow, Robert	3	1/25/2019	10	0.2643	18,056,987	64,500
Pine Cliff Energy Ltd.	Common Shares	Disbrow, Robert	3	1/28/2019	10	0.26	18,092,487	35,500
Pine Cliff Energy Ltd.	Common Shares	Disbrow, Robert	3	1/28/2019	10	0.25	16,800,000	37,500
Pinnacle Renewable Energy Inc.	RSU	Bell, Patrick Ward	4	12/31/2018	56		1,734	531
Pinnacle Renewable Energy Inc.	RSU	MacDiarmid, John Hugh	4	12/31/2018	56		1,734	531
Pinnacle Renewable Energy Inc.	RSU	O'Hagan, Jane	4	12/31/2018	56		1,734	531
Pitchblack Resources Ltd. (formerly Cash Minerals Ltd.)	Common Shares	Sulliden Mining Capital Inc.	3	6/22/2016	00			
Pitchblack Resources Ltd. (formerly Cash Minerals Ltd.)	Common Shares	Sulliden Mining Capital Inc.	3	6/22/2016	00			
Pivot Exploration Inc.	Common Shares	Kalt, Ryan	3	1/30/2019	10	0.09	3,263,500	5,500
Plateau Energy Metals Inc.	Common Shares	Disbrow, Robert	3	1/25/2019	10	0.666	6,573,663	25,000
Poda Technologies Ltd.	Options	Gray, Patrick Shaun	4	1/31/2019	37	0.16	66,548	-233,452
Poda Technologies Ltd.	Common Shares	Karkairan, Ryan	4, 5	1/31/2019	37		34,318	-120,388
Poda Technologies Ltd.	Options	Karkairan, Ryan	4, 5	1/31/2019	37		255,102	-894,898
Poda Technologies Ltd.	Options	Morrison, Jon	5	1/31/2019	37	0.16	66,548	-233,452
Poda Technologies Ltd.	Common Shares	Selby, Ryan	4, 5	1/31/2019	37		62,321	-218,624
Poda Technologies Ltd.	Options	Selby, Ryan	4, 5	1/31/2019	37		510,204	-1,789,796
Polymet Mining Corp.	Common Shares	Dreisinger, David Bruce	4	1/25/2019	10	0.7817	362,501	-30,000
Polymet Mining Corp.	Common Shares	Dreisinger, David Bruce	4	1/28/2019	10	0.785	359,169	-3,332
Polymet Mining Corp.	Common Shares	Hunter, Stephanie	5	1/30/2019	51	0.711	62,470	2,600
Polymet Mining Corp.	Options	Hunter, Stephanie	5	1/30/2019	59	0.711	165,600	-47,400
Polymet Mining Corp.	Options	Hunter, Stephanie	5	1/30/2019	51	0.711	163,000	-2,600

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Power Corporation of Canada	Subordinate Voting Shares	Vial, Arnaud	5	12/31/2018	30	30.148		2,288
Power Corporation of Canada	Subordinate Voting Shares	Vial, Arnaud	5	12/31/2018	30	30.148		2,288
Premium Brands Holdings Corporation	Common Shares	McKinnon, Crawford Hugh	4	5/31/2018	36		73,982	2,777
Premium Brands Holdings Corporation	Subscription Receipts	McKinnon, Crawford Hugh	4	5/31/2018	36		0	-2,777
Pro Real Estate Investment Trust	Units	Levitt, John	4	1/31/2019	10	2.19	81,504	20,465
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Bees, William Charles Henry Labossiere	7	12/4/2018	56	0.39		93,600
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Bees, William Charles Henry Labossiere	7	12/4/2018	56	0.39	300,725	124,800
Prometic Life Sciences Inc.	Options	BEST, SIMON GEOFFREY	4	1/24/2019	50	0.3	1,936,004	1,622,620
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Booth, Jonathan	5	12/4/2018	56	0.39		81,000
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Booth, Jonathan	5	12/4/2018	56	0.39	296,900	108,000
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Burton, Steven J.	7	12/4/2018	56	0.39		93,600
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Burton, Steven J.	7	12/4/2018	56	0.39	330,275	124,800
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Chen, Dwun-Hou	7	12/4/2018	56	0.39		93,600
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Chen, Dwun-Hou	7	12/4/2018	56	0.39	495,600	124,800
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Duguay, Rachel	7	12/4/2018	56	0.39		93,600
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Duguay, Rachel	7	12/4/2018	56	0.39	257,900	124,800
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Gagnon, Lyne	7	12/4/2018	56	0.39		93,600
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Gagnon, Lyne	7	12/4/2018	56	0.39	295,839	124,800
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Harris, Frederick Gordon	7	12/4/2018	56	0.39		81,000
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Harris, Frederick Gordon	7	12/4/2018	56	0.39	281,180	108,000
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Leclerc, Martin	5	12/4/2018	56	0.39		93,600
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Leclerc, Martin	5	12/4/2018	56	0.39	207,300	124,800
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Lortie, Murielle	5	12/4/2018	56	0.39		93,600
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Lortie, Murielle	5	12/4/2018	56	0.39	124,800	124,800
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Moran, John Edward	5	12/4/2018	56	0.39		861,867

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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/ Disposed
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Moran, John Edward	5	12/4/2018	56	0.39	2,203,964	1,156,447
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Pritchard, Bruce	5	12/4/2018	56	0.39		1,252,770
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Pritchard, Bruce	5	12/4/2018	56	0.39	3,065,767	1,688,589
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Sartore, Patrick	5	12/4/2018	56	0.39		1,022,647
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Sartore, Patrick	5	12/4/2018	56	0.39	2,606,057	1,377,201
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Wendel, Bruce	5	12/4/2018	56	0.39		710,127
Prometic Life Sciences Inc.	Unités d'actions restreintes / Restricted Share Units	Wendel, Bruce	5	12/4/2018	56	0.39	946,836	946,836
ProMIS Neurosciences Inc.	Common Shares	Johanne, Kaplan	5	7/18/2016	00			
ProMIS Neurosciences Inc.	Common Shares	Johanne, Kaplan	5	1/23/2019	16	0.173	289,017	289,017
ProMIS Neurosciences Inc.	Options	Johanne, Kaplan	5	1/4/2019	50	0.25	2,500,000	1,000,000
ProMIS Neurosciences Inc.	Warrants	Johanne, Kaplan	5	7/18/2016	00			
ProMIS Neurosciences Inc.	Warrants	Johanne, Kaplan	5	1/23/2019	16	0.48	289,017	289,017
Prophecy Development Corp.	Common Shares without par value	Panneton, Gerald	4, 5	1/31/2019	10	0.245	1,440,000	20,000
Prophecy Development Corp.	Common Shares without par value	Panneton, Gerald	4, 5	2/1/2019	10	0.245		20,000
Prophecy Development Corp.	Common Shares without par value	Panneton, Gerald	4, 5	2/1/2019	10	0.245		20,000
Puma Exploration Inc.	Common Shares	Robillard, Marcel	4, 5	1/28/2019	10	0.035	2,896,465	15,000
Pure Multi-Family REIT LP	Restricted Units	Evans, Steve	4, 5	1/23/2019	56	8.23	67,108	34,740
Pushfor Investments Inc.	Common Shares	Ayrapetian, Aram	4, 5	3/29/2018	00			
Pushfor Investments Inc.	Stock Option	Ayrapetian, Aram	4, 5	3/29/2018	00			
Pushfor Investments Inc.	Warrant	Ayrapetian, Aram	4, 5	3/29/2018	00			
Pushfor Investments Inc.	Common Shares	Bonacci, Carmine (Carlo)	4, 5	4/30/2018	00			
Pushfor Investments Inc.	Stock Option	Bonacci, Carmine (Carlo)	4, 5	4/30/2018	00			
Pushfor Investments Inc.	Warrant	Bonacci, Carmine (Carlo)	4, 5	4/30/2018	00			
QMX Gold Corporation (formerly Alexis Minerals Corporation)	Common Shares	Humphrey, Bradley Dean	4, 5	10/11/2016	00			
QMX Gold Corporation (formerly Alexis Minerals Corporation)	Common Shares	Humphrey, Bradley Dean	4, 5	2/1/2019	10	0.085	100,000	100,000
QMX Gold Corporation (formerly Alexis Minerals Corporation)	Common Shares	Humphrey, Bradley Dean	4, 5	5/31/2017	10			10,000
QMX Gold Corporation (formerly Alexis Minerals Corporation)	Common Shares	Humphrey, Bradley Dean	4, 5	5/31/2017	10			10,000
QMX Gold Corporation (formerly Alexis Minerals Corporation)	Common Shares	Humphrey, Bradley Dean	4, 5	9/10/2018	10	0.085		40,000
QMX Gold Corporation (formerly Alexis Minerals Corporation)	Common Shares	Humphrey, Bradley Dean	4, 5	9/10/2018	10	0.085		40,000

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QMX Gold Corporation (formerly Alexis Minerals Corporation)	Common Shares	Humphrey, Bradley Dean	4, 5	9/10/2018	10	0.08		50,000
QMX Gold Corporation (formerly Alexis Minerals Corporation)	Common Shares	Humphrey, Bradley Dean	4, 5	9/10/2018	10	0.08		50,000
Quebecor Inc.	Subordinate Voting Shares Catégorie B	Bélanger, Chantal	4	1/25/2019	10	30.45	1,000	1,000
RavenSource Fund (formerly The First Asia Income Fund)	Trust Units	Reid, Scott	3	1/28/2019	10	17.25	157,227	-800
RavenSource Fund (formerly The First Asia Income Fund)	Trust Units	Reid, Scott	3	1/31/2019	10	17.25	156,627	-600
Razor Energy Corp.	Common Shares	Braun, Kevin Edward	5	1/31/2019	10	3.393	10,750	750
Razor Energy Corp.	Common Shares	Braun, Kevin Edward	5	1/31/2019	30	2.39	10,802	52
Razor Energy Corp.	Common Shares	Braun, Kevin Edward	5	1/31/2019	30	2.39	8,819	32
Razor Energy Corp.	Common Shares	Mueller, Lisa Ann	5	1/25/2019	10	2.39	93,790	500
Razor Energy Corp.	Common Shares	Mueller, Lisa Ann	5	1/25/2019	10	2.4	94,290	500
Razor Energy Corp.	Common Shares	Mueller, Lisa Ann	5	1/31/2019	30	2.39	94,588	298
Razor Energy Corp.	Common Shares	Mueller, Lisa Ann	5	1/31/2019	30	2.39	21,324	51
Razor Energy Corp.	Common Shares	Mueller, Lisa Ann	5	1/31/2019	30	2.39	23,139	106
Razor Energy Corp.	Common Shares	Muller, Frank Peter	4, 5	1/31/2019	30	2.39	975,941	573
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/2/2019	38	3.7817	21,100	21,100
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/2/2019	38	3.7817	0	-21,100
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/3/2019	38	4.1013	23,900	23,900
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/3/2019	38	4.1013	0	-23,900
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/4/2019	38	4.0637	39,400	39,400
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/4/2019	38	4.0637	0	-39,400
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/7/2019	38	4.0745	11,500	11,500
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/7/2019	38	4.0745	0	-11,500
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/8/2019	38	4.0723	12,900	12,900
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/8/2019	38	4.0723	0	-12,900
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/9/2019	38	4.0514	4,100	4,100
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/9/2019	38	4.0514	0	-4,100
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/10/2019	38	4.0673	6,800	6,800
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/10/2019	38	4.0673	0	-6,800
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/11/2019	38	4.1312	9,900	9,900
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/11/2019	38	4.1312	0	-9,900
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/14/2019	38	4.05	400	400
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/14/2019	38	4.05	0	-400
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/15/2019	38	4.0414	12,900	12,900
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/15/2019	38	4.0414	0	-12,900
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/16/2019	38	4.0247	26,300	26,300
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/16/2019	38	4.0247	0	-26,300
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/17/2019	38	4.0896	36,100	36,100
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/17/2019	38	4.0896	0	-36,100
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/18/2019	38	3.9885	5,700	5,700
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/18/2019	38	3.9885	0	-5,700
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/21/2019	38	3.962	2,900	2,900
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/21/2019	38	3.962	0	-2,900
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/22/2019	38	3.8837	12,400	12,400
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/22/2019	38	3.8837	0	-12,400
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/23/2019	38	3.8567	40,600	40,600
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/23/2019	38	3.8567	0	-40,600
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/24/2019	38	3.9108	4,600	4,600
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/24/2019	38	3.9108	0	-4,600
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/25/2019	38	3.8734	9,200	9,200
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/25/2019	38	3.8734	0	-9,200
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/28/2019	38	3.9513	9,800	9,800



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Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/28/2019	38	3.9513	0	-9,800
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/29/2019	38	3.8681	12,100	12,100
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/29/2019	38	3.8681	0	-12,100
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/30/2019	38	3.8692	21,200	21,200
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/30/2019	38	3.8692	0	-21,200
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/31/2019	38	4.0645	30,400	30,400
Real Matters Inc.	Common Shares	Real Matters Inc.	1	1/31/2019	38	4.0645	0	-30,400
Real Matters Inc.	Options	Vukanovich, Peter Michael	4	1/31/2019	00		15,000	
RediShred Capital Corp.	Options	Foster, Brad Edward	4	1/30/2019	50		159,150	71,150
RediShred Capital Corp.	Options	MacMillan, Mark Jeffrey	4, 5	1/30/2019	50		97,950	25,450
RediShred Capital Corp.	Options	Richardson, Robert	4	1/30/2019	50		152,450	27,450
Redline Communications Group Inc.	Common Shares	de Gaspe Beaubien, Philippe III	3, 4	1/25/2019	10	1.2201	2,467,735	-40,000
Redline Communications Group Inc.	Common Shares	de Gaspe Beaubien, Philippe III	3, 4	1/28/2019	10	1.24	2,283,735	-184,000
Redline Communications Group Inc.	Common Shares	de Gaspe Beaubien, Philippe III	3, 4	1/29/2019	10	1.24	2,228,835	-54,900
Relay Medical Corp. (formerly, ChroMedX Corp).	Common Shares	Invidx Corp	3	2/1/2019	10		17,667,052	-49,000
Relay Medical Corp. (formerly, ChroMedX Corp).	Common Shares	Kent, William Gordon Clark	4, 5	1/22/2019	10	0.21	969,452	15,000
Relay Medical Corp. (formerly, ChroMedX Corp).	Common Shares	Kent, William Gordon Clark	4, 5	1/23/2019	10	0.21	979,452	10,000
Renforth Resources Inc.	Options	Breede, Kurt	4	11/30/2018	00			
Renforth Resources Inc.	Options	Breede, Kurt	4	1/30/2019	50	0.07	150,000	150,000
Restaurant Brands International Inc.	Common Shares	Kobza, Joshua	5	1/23/2019	00		24,510	
Restaurant Brands International Inc.	Exchangeable Units of Restaurant Brands International LP	Kobza, Joshua	5	1/23/2019	00		5,413	
Restaurant Brands International Inc.	Options	Kobza, Joshua	5	1/23/2019	00		1,069,261	
Restaurant Brands International Inc.	Units Restricted Shares	Kobza, Joshua	5	1/23/2019	00		441,841	
Restaurant Brands International Limited Partnership	Units Class B Exchangeable Limited Partnership	Kobza, Joshua	7	1/23/2019	00		5,413	
Resverlogix Corp.	Common Shares	Shenzhen Hepalink Pharmaceutical Co., Ltd.	3	1/31/2019	16	3	77,233,398	2,213,398
Resverlogix Corp.	Warrants	Shenzhen Hepalink Pharmaceutical Co., Ltd.	3	1/31/2019	16		8,440,055	1,106,699
Richelieu Hardware Ltd.	Options	Auclair, Antoine	5	1/24/2019	50	25.27	175,000	10,000
Richelieu Hardware Ltd.	Options	Godeau, Yannick	5	1/24/2019	50	25.27	13,000	2,000
Richelieu Hardware Ltd.	Options	Grenier, Guy	5	1/24/2019	50	25.27	94,000	10,000
Richelieu Hardware Ltd.	Options	Lord, Richard	4, 5	1/24/2019	50	25.27	477,000	51,000
Richelieu Hardware Ltd.	Options	Pomerleau, Pierre	4	1/24/2019	50	25.27	9,000	3,000
Richelieu Hardware Ltd.	Options	Vachon, Sylvie	4	1/24/2019	50	25.27	12,000	3,000
Ridgewood Canadian Investment Grade Bond Fund	Units	Ridgewood Capital Asset Management	3	1/25/2019	10	14.89	8,111,002	530
Ridgewood Canadian Investment Grade Bond Fund	Units	Ridgewood Capital Asset Management	3	1/25/2019	10	14.89	8,110,965	-37
Ridgewood Canadian Investment Grade Bond Fund	Units	Ridgewood Capital Asset Management	3	1/25/2019	10	14.89		530

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Ridgewood Canadian Investment Grade Bond Fund	Units		Ridgewood Capital Asset Management		3	1/25/2019	10	14.89		530
Ridgewood Canadian Investment Grade Bond Fund	Units		Ridgewood Capital Asset Management		3	1/29/2019	10	14.89	8,110,831	-134
Ridgewood Canadian Investment Grade Bond Fund	Units		Ridgewood Capital Asset Management		3	1/29/2019	10	14.89	8,110,963	132
Ridgewood Canadian Investment Grade Bond Fund	Units		Ridgewood Capital Asset Management		3	1/30/2019	10	14.89	8,111,405	442
Ridgewood Canadian Investment Grade Bond Fund	Units		Ridgewood Capital Asset Management		3	1/30/2019	10	14.89	8,111,257	-148
Ridgewood Canadian Investment Grade Bond Fund	Units		Ridgewood Capital Asset Management		3	1/31/2019	10	14.89	8,112,508	1,251
Ridgewood Canadian Investment Grade Bond Fund	Units		Ridgewood Capital Asset Management		3	1/31/2019	10	14.89	8,112,441	-67
RIOCAN REAL ESTATE INVESTMENT TRUST	Performance Unit	Equity	Ballantyne, John		5	1/31/2019	30	562	12,950	562
RIOCAN REAL ESTATE INVESTMENT TRUST	Performance Units	Equity	Ballantyne, John		5	1/31/2019	30		24,641	1,007
RIOCAN REAL ESTATE INVESTMENT TRUST	REU for Executives	Senior	Ballantyne, John		5	1/31/2019	30		5,906	256
RIOCAN REAL ESTATE INVESTMENT TRUST	Performance Units	Equity	Duncan, William	Andrew	5	1/31/2019	30		13,038	528
RIOCAN REAL ESTATE INVESTMENT TRUST	Restricted Units (REUs)	Equity	Duncan, William	Andrew	5	8/23/2018	57	25.22	3,765	-1,069
RIOCAN REAL ESTATE INVESTMENT TRUST	Restricted Units (REUs)	Equity	Duncan, William	Andrew	5	1/31/2019	30		3,963	198
RIOCAN REAL ESTATE INVESTMENT TRUST	REU for Executives	Senior	Duncan, William	Andrew	5	1/31/2019	30		2,569	111
RIOCAN REAL ESTATE INVESTMENT TRUST	Performance Unit	Equity	Gittlin, Jonathan		5	1/31/2019	30		12,950	562
RIOCAN REAL ESTATE INVESTMENT TRUST	Performance Units	Equity	Gittlin, Jonathan		5	1/31/2019	30		24,641	1,007
RIOCAN REAL ESTATE INVESTMENT TRUST	REU for Executives	Senior	Gittlin, Jonathan		5	1/31/2019	30		5,906	247
RIOCAN REAL ESTATE INVESTMENT TRUST	REUs for Employees		Jageshar, Bibi		8	1/31/2019	30		862	30
RIOCAN REAL ESTATE INVESTMENT TRUST	REUs for Employees		Levy, Sandra Elizabeth		5	1/31/2019	30		2,879	56
RIOCAN REAL ESTATE INVESTMENT TRUST	Performance Unit	Equity	Ross, Jeffrey		5	1/31/2019	30		12,950	562
RIOCAN REAL ESTATE INVESTMENT TRUST	Performance Units	Equity	Ross, Jeffrey		5	1/31/2019	30		24,641	1,007
RIOCAN REAL ESTATE INVESTMENT TRUST	REU for Executives	Senior	Ross, Jeffrey		5	1/31/2019	30		5,906	256
RIOCAN REAL ESTATE INVESTMENT TRUST	REUs for Employees		Smith, Franca		5	1/31/2019	30		3,556	154
RIOCAN REAL ESTATE INVESTMENT TRUST	Performance Unit	Equity	Sonshine, Edward		4, 5	1/31/2019	30		78,762	3,417
RIOCAN REAL ESTATE INVESTMENT TRUST	Performance Units	Equity	Sonshine, Edward		4, 5	1/31/2019	30		147,351	6,032
RIOCAN REAL ESTATE INVESTMENT TRUST	REU for Executives	Senior	Sonshine, Edward		4, 5	1/31/2019	30		73,864	3,205
RIOCAN REAL ESTATE INVESTMENT TRUST	Restricted Units (REUs)	Equity	Sturm, Naftali		8	1/31/2019	30		3,544	68
RIOCAN REAL ESTATE INVESTMENT TRUST	REUs for Employees		Sturm, Naftali		8	1/31/2019	30		10,070	437
RIOCAN REAL ESTATE INVESTMENT TRUST	Performance Units	Equity	Suess, Jennifer		5	1/31/2019	30		4,428	171
RIOCAN REAL ESTATE INVESTMENT TRUST	REU for Executives	Senior	Suess, Jennifer		5	1/31/2019	30			159

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RIOCAN REAL ESTATE INVESTMENT TRUST	REU for Executives	Senior	Suess, Jennifer	5	1/31/2019	30	1,805	78
RIOCAN REAL ESTATE INVESTMENT TRUST	Performance Units	Equity	Tang, Qi	5	1/31/2019	30	14,650	868
RIOCAN REAL ESTATE INVESTMENT TRUST	REU for Executives	Senior	Tang, Qi	5	1/31/2019	30	3,667	159
RISE Life Science Corp.	Options		Mills, James Gregory	4	1/29/2019	00	200,000	
RISE Life Science Corp.	Common Shares		Secord, Lawrence Scott	4	1/28/2019	10	0.205	79,000
RISE Life Science Corp.	Common Shares		Secord, Lawrence Scott	4	2/1/2019	10	0.25	189,500
RISE Life Science Corp.	Warrants		Secord, Lawrence Scott	4	10/3/2018	00		
RISE Life Science Corp.	Warrants		Secord, Lawrence Scott	4	1/25/2019	53	0.15	1,000,000
Rogers Sugar Inc.	Common Shares		Discepola, Diana Roccarosa	5	12/31/2018	30	5.6476	1,600
Rogers Sugar Inc.	Common Shares		Musuele, Vanessa	5	12/31/2018	30	5.71	1,831
Royal Nickel Corporation	Common Shares		2176423 Ontario Ltd.	3	1/28/2019	10	0.63	47,137,042
Royal Nickel Corporation	Common Shares		2176423 Ontario Ltd.	3	1/29/2019	10	0.63	47,237,042
Royal Nickel Corporation	Common Shares		Goudie, Peter James	4	1/25/2019	51	0.27	1,235,644
Royal Nickel Corporation	Common Shares		Goudie, Peter James	4	1/25/2019	10	0.64	40,000
Royal Nickel Corporation	Common Shares		Goudie, Peter James	4	1/25/2019	10	0.64	40,000
Royal Nickel Corporation	Common Shares		Goudie, Peter James	4	1/25/2019	10	0.64	1,195,644
Royal Nickel Corporation	Options		Goudie, Peter James	4	1/25/2019	51	1,830,000	-40,000
Royal Nickel Corporation	Rights Restricted Share Units		Goudie, Peter James	4	1/23/2019	56	727,648	24,194
Royal Nickel Corporation	Rights Restricted Share Units		Goudie, Peter James	4	1/28/2019	59	645,231	-82,417
Royal Nickel Corporation	Rights Share Appreciation Rights		Goudie, Peter James	4	1/28/2019	59	52,000	-50,000
Royal Nickel Corporation	Common Shares		Hand, Scott McKee	4, 5	1/24/2019	57		3,213,412
Royal Nickel Corporation	Common Shares		Hand, Scott McKee	4, 5	1/24/2019	51	0.27	3,273,412
Royal Nickel Corporation	Options		Hand, Scott McKee	4, 5	1/24/2019	51	0.27	3,420,000
Royal Nickel Corporation	Rights Restricted Share Units		Hand, Scott McKee	4, 5	1/23/2019	56	1,692,768	50,403
Royal Nickel Corporation	Rights Restricted Share Units		Hand, Scott McKee	4, 5	1/24/2019	57	1,521,065	-171,703
Royal Nickel Corporation	Rights Share Appreciation Rights		Hand, Scott McKee	4, 5	1/28/2019	59	78,000	-75,000
Royal Nickel Corporation	Common Shares		Hollaar, Timothy Lee	5	1/24/2019	57	476,914	85,714
Royal Nickel Corporation	Rights Restricted Share Units		Hollaar, Timothy Lee	5	12/31/2018	56	664,533	27,222
Royal Nickel Corporation	Rights Restricted Share Units		Hollaar, Timothy Lee	5	1/23/2019	56	702,638	38,105
Royal Nickel Corporation	Rights Restricted Share Units		Hollaar, Timothy Lee	5	1/24/2019	57	616,924	-85,714
Royal Nickel Corporation	Rights Restricted Share Units		Hollaar, Timothy Lee	5	1/28/2019	59	361,924	-255,000
Royal Nickel Corporation	Rights Restricted Share Units		Huet, Paul André	4	11/19/2018	00		
Royal Nickel Corporation	Rights Restricted Share Units		Huet, Paul André	4	1/23/2019	56	5,785	5,785
Royal Nickel Corporation	Rights Restricted Share Units		Kei, Wendy Wai Ting	4	1/23/2019	56	56,204	24,194
Royal Nickel Corporation	Rights Restricted Share Units		Leddy, John Joseph	5	12/31/2018	56	722,676	37,333
Royal Nickel Corporation	Common Shares		Marzoli, Frank	4	1/28/2019	51	0.27	97,051
Royal Nickel Corporation	Options		Marzoli, Frank	4	12/12/2013	50	0.27	40,000
Royal Nickel Corporation	Options		Marzoli, Frank	4	12/12/2013	50	0.27	40,000
Royal Nickel Corporation	Options		Marzoli, Frank	4	1/28/2019	51	1,990,000	-40,000
Royal Nickel Corporation	Rights Restricted Share Units		Marzoli, Frank	4	1/28/2019	59	490,988	-68,681

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Royal Nickel Corporation	Rights Share Appreciation Rights	Marzoli, Frank	4	1/28/2019	59		52,000	-50,000
Royal Nickel Corporation	Common Shares	McInnes, Donald Arthur	4	1/24/2019	57		1,283,835	78,549
Royal Nickel Corporation	Rights Restricted Share Units	McInnes, Donald Arthur	4	1/24/2019	56		623,826	24,194
Royal Nickel Corporation	Rights Restricted Share Units	McInnes, Donald Arthur	4	1/24/2019	57		545,277	-78,549
Royal Nickel Corporation	Common Shares	Muinonen, Johnna Louise	5	1/24/2019	57		71,015	41,015
Royal Nickel Corporation	Common Shares	Muinonen, Johnna Louise	5	1/24/2019	57		114,765	43,750
Royal Nickel Corporation	Common Shares	Muinonen, Johnna Louise	5	1/25/2019	51	0.27	227,265	112,500
Royal Nickel Corporation	Common Shares	Muinonen, Johnna Louise	5	1/25/2019	10	0.6456	114,765	-112,500
Royal Nickel Corporation	Options	Muinonen, Johnna Louise	5	1/25/2019	51		2,200,000	-112,500
Royal Nickel Corporation	Rights Restricted Share Units	Muinonen, Johnna Louise	5	12/31/2018	56		655,932	27,222
Royal Nickel Corporation	Rights Restricted Share Units	Muinonen, Johnna Louise	5	1/23/2019	56		694,037	38,105
Royal Nickel Corporation	Rights Restricted Share Units	Muinonen, Johnna Louise	5	1/24/2019	57		653,022	-41,015
Royal Nickel Corporation	Rights Restricted Share Units	Muinonen, Johnna Louise	5	1/24/2019	57		609,272	-43,750
Royal Nickel Corporation	Rights Restricted Share Units	Muinonen, Johnna Louise	5	1/28/2019	59		593,601	-15,671
Royal Nickel Corporation	Rights Restricted Share Units	Muinonen, Johnna Louise	5	1/28/2019	59		515,243	-78,358
Royal Nickel Corporation	Rights Restricted Share Units	Muinonen, Johnna Louise	5	1/28/2019	59		260,243	-255,000
Royal Nickel Corporation	Rights Share Appreciation Rights	Muinonen, Johnna Louise	5	1/28/2019	59		62,000	-97,500
Royal Nickel Corporation	Common Shares	Selby, Mark Thomas	5	1/24/2019	51	0.27	2,275,000	150,000
Royal Nickel Corporation	Common Shares	Selby, Mark Thomas	5	1/24/2019	57		2,343,359	68,359
Royal Nickel Corporation	Common Shares	Selby, Mark Thomas	5	1/24/2019	57		2,416,275	72,916
Royal Nickel Corporation	Options	Selby, Mark Thomas	5	1/24/2019	51	0.27	4,075,000	-150,000
Royal Nickel Corporation	Rights Restricted Share Units	Selby, Mark Thomas	5	12/31/2018	56		2,122,096	90,741
Royal Nickel Corporation	Rights Restricted Share Units	Selby, Mark Thomas	5	1/23/2019	56		2,200,846	78,750
Royal Nickel Corporation	Rights Restricted Share Units	Selby, Mark Thomas	5	1/24/2019	57		2,132,487	-68,359
Royal Nickel Corporation	Rights Restricted Share Units	Selby, Mark Thomas	5	1/24/2019	57		2,059,571	-72,916
Royal Nickel Corporation	Rights Restricted Share Units	Selby, Mark Thomas	5	1/28/2019	59		1,807,085	-252,486
Royal Nickel Corporation	Rights Restricted Share Units	Selby, Mark Thomas	5	1/28/2019	59		1,756,588	-50,497
Royal Nickel Corporation	Rights Restricted Share Units	Selby, Mark Thomas	5	1/28/2019	59		906,588	-850,000
Royal Nickel Corporation	Rights Share Appreciation Rights	Selby, Mark Thomas	5	1/28/2019	59		94,000	-150,000
Royal Nickel Corporation	Common Shares	Sprott, Eric S.	3	1/28/2019	10	0.63	47,137,042	400,000
Royal Nickel Corporation	Common Shares	Sprott, Eric S.	3	1/29/2019	10	0.63	47,237,042	100,000
Royal Nickel Corporation	Common Shares	St-Jean, Joseph Alger Raymond	5	12/10/2010	00			
Royal Nickel Corporation	Common Shares	St-Jean, Joseph Alger Raymond	5	1/24/2019	57		8,203	8,203
Royal Nickel Corporation	Common Shares	St-Jean, Joseph Alger Raymond	5	1/24/2019	57		16,953	8,750

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Royal Nickel Corporation	Common Shares	St-Jean, Joseph Alger Raymond	5	1/28/2019	51	0.27	129,453	112,500
Royal Nickel Corporation	Common Shares	St-Jean, Joseph Alger Raymond	5	1/28/2019	10	0.6399	61,510	-67,943
Royal Nickel Corporation	Options	St-Jean, Joseph Alger Raymond	5	1/28/2019	51		2,309,000	-112,500
Royal Nickel Corporation	Rights Restricted Share Units	St-Jean, Joseph Alger Raymond	5	12/31/2018	56		621,630	27,222
Royal Nickel Corporation	Rights Restricted Share Units	St-Jean, Joseph Alger Raymond	5	1/23/2019	56		659,735	38,105
Royal Nickel Corporation	Rights Restricted Share Units	St-Jean, Joseph Alger Raymond	5	1/24/2019	57		651,532	-8,203
Royal Nickel Corporation	Rights Restricted Share Units	St-Jean, Joseph Alger Raymond	5	1/24/2019	57		642,782	-8,750
Royal Nickel Corporation	Rights Restricted Share Units	St-Jean, Joseph Alger Raymond	5	1/28/2019	59		564,424	-78,358
Royal Nickel Corporation	Rights Restricted Share Units	St-Jean, Joseph Alger Raymond	5	1/28/2019	59		548,753	-15,671
Royal Nickel Corporation	Rights Restricted Share Units	St-Jean, Joseph Alger Raymond	5	1/28/2019	59		293,753	-255,000
Royal Nickel Corporation	Rights Share Appreciation Rights	St-Jean, Joseph Alger Raymond	5	1/28/2019	59		62,000	-97,500
Royal Road Minerals Limited	Options	Keshishian, Ardem	5	1/23/2019	00			
Royal Road Minerals Limited	Options	Keshishian, Ardem	5	1/24/2019	50		1,000,000	1,000,000
Royal Road Minerals Limited	Ordinary Shares	Keshishian, Ardem	5	1/23/2019	00		100,000	
Rubicon Organics Inc.	Common Shares	Savics, Eric	3	1/29/2019	10	2	274,600	100,000
Rupert Resources Ltd.	Common Shares	Brimacombe, Alan Douglas	3	2/1/2019	10	1.04	19,903,400	-25,000
Sanatana Resources Inc.	Common Shares	Smith, Ian Barrowman	4	1/29/2019	00		600,000	
Seabridge Gold Inc.	Common Shares	Trujillo, Gloria M.	8	2/1/2019	51	10.45	30,794	6,667
Seabridge Gold Inc.	Options	Trujillo, Gloria M.	8	2/1/2019	51	10.45	23,333	-6,667
Seahawk Ventures Inc.	Common Shares	Gasbarro, Giovanni	4	1/29/2019	51	0.4	2,154,000	100,000
Seahawk Ventures Inc.	Options	Gasbarro, Giovanni	4	1/28/2019	51		250,000	-100,000
Sernova Corp.	Common Shares	Toleikis, Philip Michael	4, 5	1/27/2019	51	0.15	4,758,423	650,000
Sernova Corp.	Options	Toleikis, Philip Michael	4, 5	1/27/2019	51		2,750,000	-650,000
SHAW COMMUNICATIONS INC.	Non-Voting Class "B" Shares	Estate of James R. Shaw	3	1/30/2019	30	25.858	340	8
SHAW COMMUNICATIONS INC.	Non-Voting Class "B" Shares	Shaw, Bradley	4, 5	1/30/2019	30	25.858	4,501	40
SHAW COMMUNICATIONS INC.	Non-Voting Class "B" Shares	Shaw, Bradley	4, 5	1/30/2019	30	25.858	3,022	50
SHAW COMMUNICATIONS INC.	Non-Voting Class "B" Shares	Shaw, Bradley	4, 5	1/30/2019	30	25.858	3,022	50
SHAW COMMUNICATIONS INC.	Non-Voting Class "B" Shares	Shaw, Bradley	4, 5	1/30/2019	30	25.858	3,022	50
SHAW COMMUNICATIONS INC.	Non-Voting Class "B" Shares	Shaw, Bradley	4, 5	1/30/2019	30	25.858	120	2
SHAW COMMUNICATIONS INC.	Non-Voting Class "B" Shares	Shaw, Heather Ann	3	1/30/2019	30	25.858	3,127	50
SHAW COMMUNICATIONS INC.	Non-Voting Class "B" Shares	Shaw, JR	3, 4, 5	1/30/2019	30	25.858	59,866	330

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SHAW COMMUNICATIONS INC.	Non-Voting Class "B"	Shares	Shaw, Julie	5	1/30/2019	30	25.858	29,092	120
SHAW COMMUNICATIONS INC.	Non-Voting Class "B"	Shares	Shaw, Julie	5	1/30/2019	30	25.858	5,449	59
SHAW COMMUNICATIONS INC.	Non-Voting Class "B"	Shares	Shaw, Julie	5	1/30/2019	30	25.858	4,788	56
SHAW COMMUNICATIONS INC.	Non-Voting Class "B"	Shares	Shaw, Julie	5	1/30/2019	30	25.858	4,788	56
Shopify Inc.	Multiple Voting Shares Class B Multiple Voting Shares		Finkelstein, Michael	Harley	5	1/31/2019	51	0.152	4,791
Shopify Inc.	Multiple Voting Shares Class B Multiple Voting Shares		Finkelstein, Michael	Harley	5	1/31/2019	36	0	-4,791
Shopify Inc.	Options		Finkelstein, Michael	Harley	5	1/31/2019	51	0.152	196,465
Shopify Inc.	Subordinate Shares Class A Subordinate Voting Shares	Voting Class A	Finkelstein, Michael	Harley	5	1/31/2019	36	4,791	4,791
Shopify Inc.	Subordinate Shares Class A Subordinate Voting Shares	Voting Class A	Finkelstein, Michael	Harley	5	1/31/2019	30	162.51	0
Shopify Inc.	Subordinate Shares Class A Subordinate Voting Shares	Voting Class A	Lutke, Tobias Albin	4, 5	1/28/2019	30	159.94	175,000	-5,000
SITKA GOLD CORP.	Common Shares		Coe, Corwin	4, 5	1/25/2019	10	0.095	1,054,000	27,000
SITKA GOLD CORP.	Common Shares		Coe, Corwin	4, 5	1/25/2019	10	0.1	1,077,000	23,000
SITKA GOLD CORP.	Common Shares		Coe, Corwin	4, 5	1/28/2019	10	0.1	1,085,000	8,000
SLANG Worldwide Inc. (formerly Fire Cannabis Inc.)	Options		Driessen, Christopher Lee	4	1/28/2019	50		750,000	333,528
SLANG Worldwide Inc. (formerly Fire Cannabis Inc.)	Options		Ehler, Kelly Tyler	5	1/28/2019	50	1.5	75,000	25,000
SLANG Worldwide Inc. (formerly Fire Cannabis Inc.)	Common Shares		Levy, William	4, 5	1/21/2019	00		2,250,000	
SLANG Worldwide Inc. (formerly Fire Cannabis Inc.)	Options		Levy, William	4, 5	1/21/2019	00		250,000	
SLANG Worldwide Inc. (formerly Fire Cannabis Inc.)	Options		Levy, William	4, 5	1/22/2019	50	1.5	2,750,000	2,500,000
SLANG Worldwide Inc. (formerly Fire Cannabis Inc.)	Rights Restricted Share Units		Levy, William	4, 5	1/21/2019	00			
SLANG Worldwide Inc. (formerly Fire Cannabis Inc.)	Rights Restricted Share Units		Levy, William	4, 5	1/22/2019	56		1,800,000	1,800,000
SLANG Worldwide Inc. (formerly Fire Cannabis Inc.)	Options		Rutherford, Patrick Alexander	Mikel	5	1/28/2019	50	250,000	100,000
Slate Office REIT	Deferred Units		Baker, Montgomery	Robert	4	9/30/2018	30	8,891	165
Slate Office REIT	Deferred Units		Baker, Montgomery	Robert	4	12/31/2018	30	12,402	221
Slate Office REIT	Deferred Units		Duke, Nora		4	3/31/2018	30	8,838	151
Slate Office REIT	Deferred Units		Duke, Nora		4	6/30/2018	30	10,089	206
Slate Office REIT	Deferred Units		Duke, Nora		4	6/30/2018	30	10,295	206
Slate Office REIT	Deferred Units		Duke, Nora		4	9/30/2018	30	11,530	237
Slate Office REIT	Deferred Units		Duke, Nora		4	12/31/2018	30	13,255	267

**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Slate Office REIT	Deferred Units	O'Bryan, John Charles	4	3/31/2018	30		31,589	651
Slate Office REIT	Deferred Units	O'Bryan, John Charles	4	6/30/2018	30		35,582	794
Slate Office REIT	Deferred Units	O'Bryan, John Charles	4	9/30/2018	30		39,375	893
Slate Office REIT	Deferred Units	O'Bryan, John Charles	4	12/31/2018	30		44,485	987
Slate Office REIT	Deferred Units	Spackman, Pamela Jean	4	3/31/2018	30		21,722	439
Slate Office REIT	Deferred Units	Spackman, Pamela Jean	4	6/30/2018	30		23,861	507
Slate Office REIT	Deferred Units	Spackman, Pamela Jean	4	9/30/2018	30		25,980	560
Slate Office REIT	Deferred Units	Spackman, Pamela Jean	4	12/31/2018	30		28,675	613
Sleep Country Canada Holdings Inc.	Performance Units (PSU)	Share Friesema, David	4	12/31/2018	30	25.76	38,751	94
Sleep Country Canada Holdings Inc.	Performance Units (PSU)	Share Masson, Robert	5	12/31/2018	30	25.76	17,927	38
Sleep Country Canada Holdings Inc.	Performance Units (PSU)	Share Schaefer, Stewart	5	12/31/2018	30	25.76	34,870	79
Sleep Country Canada Holdings Inc.	Performance Units (PSU)	Share Will, Sieg	5	12/31/2018	30	25.76	15,501	38
SmartCentres Real Estate Investment Trust (formerly, Smart Real Estate Investment Trust)	Options	Goldhar, Mitchell	3	1/30/2019	51	20.1	2,640,731	-16,241
SmartCentres Real Estate Investment Trust (formerly, Smart Real Estate Investment Trust)	Trust Units	Goldhar, Mitchell	3	1/30/2019	51	20.1	1,956,617	16,241
SNC-Lavalin Group Inc.	Restricted Units/Unités d'actions inaccessibles	Share Wilkinson, Jonathan David	5	1/28/2019	00		7,199	
SNC-Lavalin Group Inc.	Unités de participation en actions/Performance Share Units	Wilkinson, Jonathan David	5	1/28/2019	00		10,798	
Société d'exploration minière Vior Inc.	Common Shares	Fedosiewich, Mark Brian	5	1/28/2019	10	0.095	4,793,000	5,000
Sonoro Metals Corp.	Common Shares	Darch, John Michael	4	1/31/2019	10	0.175	390,000	10,000
Spacefy Inc.	Common Shares	Scharfe, Bradley Nixon	4	1/28/2019	10	0.22	1,066,000	-66,000
Spacefy Inc.	Common Shares	Scharfe, Bradley Nixon	4	1/28/2019	10	0.225	1,076,000	10,000
Spark Power Group Inc. (formerly Canaccord Genuity Acquisition Corp.)	Common Shares	CG Investments Inc.	3	1/28/2019	10	2.3	717,936	1,500
Spark Power Group Inc. (formerly Canaccord Genuity Acquisition Corp.)	Units Class A Restricted Voting Units	CG Investments Inc.	3	1/21/2019	10	2.3	1,300	1,300
Spark Power Group Inc. (formerly Canaccord Genuity Acquisition Corp.)	Units Class A Restricted Voting Units	CG Investments Inc.	3	1/25/2019	10	2.3	2,500	1,200
Spot Coffee (Canada) Ltd.	Common Shares	AYOUB, MICHEL ANTON	4, 5	1/28/2019	10	0.14	2,015,458	3,000
Spot Coffee (Canada) Ltd.	Common Shares	AYOUB, MICHEL ANTON	4, 5	1/29/2019	10	0.135	2,018,458	3,000
Spot Coffee (Canada) Ltd.	Common Shares	AYOUB, MICHEL ANTON	4, 5	1/30/2019	10	0.12	2,022,458	4,000
Spot Coffee (Canada) Ltd.	Common Shares	Lorenzo, John Michael	4	1/25/2019	10	0.135	8,208,857	5,000
Spot Coffee (Canada) Ltd.	Common Shares	Lorenzo, John Michael	4	1/28/2019	10	0.138	8,224,857	16,000
Spot Coffee (Canada) Ltd.	Common Shares	Lorenzo, John Michael	4	1/29/2019	10	0.135	8,240,857	16,000
Spot Coffee (Canada) Ltd.	Common Shares	Lorenzo, John Michael	4	1/30/2019	10	0.125	8,252,857	12,000

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Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Spot Coffee (Canada) Ltd.	Common Shares	Lorenzo, John Michael	4	1/31/2019	10	0.136	8,272,857	20,000
Sprott Inc.	Common Shares	George, Whitney	5	2/27/2015	00			
Sprott Inc.	Common Shares	George, Whitney	5	1/29/2019	00		1,750,000	
Sprott Inc.	Common Shares	George, Whitney	5	2/27/2015	00			
Sprott Inc.	Common Shares	George, Whitney	5	1/29/2019	00		666,500	
Sprott Inc.	Common Shares	George, Whitney	5	2/27/2015	00			
Sprott Inc.	Common Shares	George, Whitney	5	1/29/2019	00		6,998,556	
Sprott Inc.	Rights Restricted Stock Unit	George, Whitney	5	2/27/2015	00			
Sprott Inc.	Rights Restricted Stock Unit	George, Whitney	5	1/29/2019	00			
Sprott Resource Holdings Inc. (formerly Adriana Resources Inc. )	EPSP Designation	Yuzpe, Stephen Mark	4, 5	1/31/2019	56	1.08	213,874	3,121
SQL Diagnostics Inc.	Warrants	Beddoe, Clive	4	1/26/2019	55		26,548,649	-1,000,000
SQL Diagnostics Inc.	Warrants	Connor, Gerald R.	4	1/26/2019	55		993,500	-212,100
SQL Diagnostics Inc.	Warrants	Connor, Gerald R.	4	1/26/2019	55		0	-51,000
SQL Diagnostics Inc.	Warrants	Connor, Gerald R.	4	1/26/2019	55		12,559,967	-15,000
SQL Diagnostics Inc.	Warrants	Connor, Gerald R.	4	1/26/2019	55		73,367	-281,400
SQL Diagnostics Inc.	Warrants	Cumberland Private Wealth Management Inc.	3	1/26/2019	55		0	-20,000
SQL Diagnostics Inc.	Warrants	Matthews, Wilmot Leslie	4	1/26/2019	55		1,000,000	-850,000
St-Georges Eco-Mining Corp.	Common Shares	Dumas, Francois	4, 5	2/1/2019	10	0.12	5,816,641	50,000
Stantec Inc.	Common Shares	DiManno, Valentino	7, 5	12/31/2018	30	33.063	9,885	940
Stantec Inc.	Common Shares	Morrison, Kirk Murray	7	12/31/2018	30	32.988	3,530	644
Stantec Inc.	Common Shares	Morrison, Kirk Murray	7	12/31/2018	30	32.987	3,474	613
Stantec Inc.	Common Shares	Murray, Scott Lynn	7, 5	12/31/2018	30	25.628	20,253	4,198
Stantec Inc.	Common Shares	Murray, Scott Lynn	7, 5	12/31/2018	30	25.94	24,571	259
Stantec Inc.	Common Shares	Wlad, Russell Edward	7	12/31/2018	30	32.98	6,779	860
Stantec Inc.	Common Shares	Wlad, Russell Edward	7	12/31/2018	30	33.096	737	97
Stantec Inc.	Common Shares	Wlad, Russell Edward	7	12/31/2018	30	33.096	6,204	99
Star Corporation	Diamond Common Shares	Read, George Henry	5	1/25/2019	10	0.245	1,913,380	-80,500
Star Corporation	Diamond Common Shares	Read, George Henry	5	1/28/2019	10	0.245	1,830,380	-83,000
Star Corporation	Diamond Common Shares	Read, George Henry	5	1/29/2019	10	0.2416	1,743,880	-86,500
Star Corporation	Diamond Common Shares	Read, George Henry	5	2/1/2019	51	300000		300,000
Star Corporation	Diamond Common Shares	Read, George Henry	5	2/1/2019	51	0.18	2,043,880	300,000
Star Corporation	Diamond Options	Read, George Henry	5	2/1/2019	51	0.18	1,525,000	-300,000
Star Navigation Systems Group Ltd.	Common Shares	LARMOR, JEAN-LOUIS	5	1/22/2019	10	0.06	1,642,067	-30,000
Star Navigation Systems Group Ltd.	Common Shares	LARMOR, JEAN-LOUIS	5	1/24/2019	10	0.065	1,612,067	-30,000
Stelco Holdings Inc.	Common Shares	Fairfax Financial Holdings Limited	3	1/21/2019	10	15.8	1,855,200	21,400
Stelco Holdings Inc.	Common Shares	Fairfax Financial Holdings Limited	3	1/22/2019	10	15.745	1,879,800	24,600
Stelco Holdings Inc.	Common Shares	Fairfax Financial Holdings Limited	3	1/23/2019	10	15.972	1,932,500	52,700
Stelco Holdings Inc.	Common Shares	Fairfax Financial Holdings Limited	3	1/21/2019	10	15.8	2,462,100	23,100
Stelco Holdings Inc.	Common Shares	Fairfax Financial Holdings Limited	3	1/22/2019	10	15.745	2,488,400	26,300
Stelco Holdings Inc.	Common Shares	Fairfax Financial Holdings Limited	3	1/23/2019	10	15.972	2,545,200	56,800



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Stelco Holdings Inc.	Common Shares	Fairfax Financial Holdings Limited	3	1/21/2019	10	15.8	1,486,100	23,100
Stelco Holdings Inc.	Common Shares	Fairfax Financial Holdings Limited	3	1/22/2019	10	15.745	1,512,400	26,300
Stelco Holdings Inc.	Common Shares	Fairfax Financial Holdings Limited	3	1/23/2019	10	15.972	1,569,200	56,800
Stella-Jones Inc.	Common Shares	Laflamme, Karen	4	1/25/2019	10	41.9	2,000	1,000
Steppe Gold Ltd.	Common Shares	Waraich, Aneel Singh	4, 5	1/22/2019	10	0.83	523,593	700
Steppe Gold Ltd.	Common Shares	Waraich, Aneel Singh	4, 5	1/22/2019	10	0.82	524,093	500
Steppe Gold Ltd.	Common Shares	Waraich, Aneel Singh	4, 5	1/24/2019	10	0.81	524,863	770
Steppe Gold Ltd.	Common Shares	Waraich, Aneel Singh	4, 5	1/28/2019	10	0.83	526,363	1,500
Steppe Gold Ltd.	Common Shares	Waraich, Aneel Singh	4, 5	1/23/2019	10	0.84	2,444,551	500
Steppe Gold Ltd.	Common Shares	Waraich, Aneel Singh	4, 5	1/23/2019	10	0.83	2,445,051	500
Steppe Gold Ltd.	Common Shares	Waraich, Aneel Singh	4, 5	1/24/2019	10	0.82	2,445,701	650
Steppe Gold Ltd.	Common Shares	Waraich, Aneel Singh	4, 5	1/24/2019	10	0.81	2,446,251	550
Steppe Gold Ltd.	Common Shares	Waraich, Aneel Singh	4, 5	1/28/2019	10	0.81	2,446,801	550
Stornoway Corporation	Diamond Performance Share Units	Gervais, Sylvie	5	1/21/2019	56	0.2126	624,290	484,290
Stornoway Corporation	Diamond Common Shares	LeBoutillier, John	4	1/28/2019	10	0.2	26,500	26,500
Stornoway Corporation	Diamond Common Shares	LeBoutillier, John	4	1/29/2019	10	0.2	100,000	73,500
Stornoway Corporation	Diamond Common Shares	Sevigny, Patrick	5	1/28/2019	00			
Stornoway Corporation	Diamond Common Shares	Sevigny, Patrick	5	1/28/2019	00			
Stornoway Corporation	Diamond Options	Sevigny, Patrick	5	1/28/2019	00		700,000	
Stornoway Corporation	Diamond Performance Share Units	Sevigny, Patrick	5	1/28/2019	00		624,290	
Sunshine Oilsands Ltd.	Common Shares Class A	Sun, Kwok Ping	3, 4	1/17/2019	10	0.025	742,839,500	200,000
Sunvest Minerals Corp.	Options	England, Michael Bruno John Franz	4	1/28/2019	50	0.05	850,000	600,000
Sunvest Minerals Corp.	Options	Masters, John Parker	4	1/28/2019	50	0.05	600,000	300,000
Sunvest Minerals Corp.	Options	McKinnon, Donald Laughlin	4	1/25/2019	50	0.05	600,000	300,000
Surge Energy Inc.	Common Shares	O'Neil, Peter Dan	5	9/5/2014	54	5.17		2,272
Surge Energy Inc.	Common Shares	O'Neil, Peter Dan	5	9/5/2014	54	5.17		2,272
Surge Energy Inc.	Common Shares	O'Neil, Peter Dan	5	10/2/2014	99			2,272
Surge Energy Inc.	Common Shares	O'Neil, Peter Dan	5	10/2/2014	99		0	-1,000
Surge Energy Inc.	Common Shares	O'Neil, Peter Dan	5	1/22/2019	10	1.29		5,000
Surge Energy Inc.	Common Shares	O'Neil, Peter Dan	5	1/22/2019	99		63,850	-143,968
Surge Energy Inc.	Common Shares	O'Neil, Peter Dan	5	1/22/2019	10	1.29		4,600
Surge Energy Inc.	Common Shares	O'Neil, Peter Dan	5	1/22/2019	10	1.29	8,460	4,600
Surge Energy Inc.	Common Shares	O'Neil, Peter Dan	5	4/13/2010	00			
Surge Energy Inc.	Common Shares	O'Neil, Peter Dan	5	4/13/2010	00		152,965	
Surge Energy Inc.	Common Shares	O'Neil, Peter Dan	5	4/13/2010	00		5,243	
Surge Energy Inc.	Common Shares	O'Neil, Peter Dan	5	6/27/2014	99			1,833
Surge Energy Inc.	Common Shares	O'Neil, Peter Dan	5	6/27/2014	99			47,014
Surge Energy Inc.	Common Shares	O'Neil, Peter Dan	5	6/27/2014	99			61,771
Surge Energy Inc.	Common Shares	O'Neil, Peter Dan	5	6/27/2014	99		45,728	41,771
Surge Energy Inc.	Common Shares	O'Neil, Peter Dan	5	6/27/2014	99			4,076
Surge Energy Inc.	Common Shares	O'Neil, Peter Dan	5	6/27/2014	99		10,790	9,076
Tamarack Valley Energy Ltd.	Rights PSUs	Christensen, David Keith	5	4/30/2014	00			
Tamarack Valley Energy Ltd.	Rights PSUs	Christensen, David Keith	5	5/29/2018	56		95,000	95,000
Tamarack Valley Energy Ltd.	Rights PSUs	Cruikshank, Ken	5	6/17/2010	00			
Tamarack Valley Energy Ltd.	Rights PSUs	Cruikshank, Ken	5	5/29/2018	56		85,000	85,000

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Tamarack Valley Energy Ltd.	Rights PSUs	Hozjan, Ronald Steve	5	6/17/2010	00			
Tamarack Valley Energy Ltd.	Rights PSUs	Hozjan, Ronald Steve	5	5/29/2018	56		120,000	120,000
Tamarack Valley Energy Ltd.	Rights PSUs	Reimond, Scott William	5	10/15/2012	00			
Tamarack Valley Energy Ltd.	Rights PSUs	Reimond, Scott William	5	5/29/2018	56		85,000	85,000
Tamarack Valley Energy Ltd.	Rights PSUs	Schmidt, Brian Leslie	5	6/17/2010	00			
Tamarack Valley Energy Ltd.	Rights PSUs	Schmidt, Brian Leslie	5	5/29/2018	56		175,000	175,000
Tamarack Valley Energy Ltd.	Rights PSUs	Screen, Kevin	5	9/7/2011	00			
Tamarack Valley Energy Ltd.	Rights PSUs	Screen, Kevin	5	5/29/2018	56		95,000	95,000
Target Capital Inc.	Common Shares	MacDonald, William Colin	4	1/28/2019	10	0.04	4,450,000	50,000
Taylor North American Equity Opportunities Fund	Units	Caranci, Mark A.	4, 5	1/29/2019	22		0	-3,000
Taylor North American Equity Opportunities Fund	Units	Kikuchi, Craig	4, 7, 5	1/15/2019	30	9.21	749	4
Taylor North American Equity Opportunities Fund	Units	Kikuchi, Craig	4, 7, 5	1/29/2019	22		0	-749
Taylor North American Equity Opportunities Fund	Units	Kikuchi, Craig	4, 7, 5	1/15/2019	30	9.23	4,200	23
Taylor North American Equity Opportunities Fund	Units	Kikuchi, Craig	4, 7, 5	1/29/2019	22		0	-4,200
TELUS Corporation	Restricted Share Units	French, Douglas	5	1/31/2019	30		97,926	1,171
TELUS Corporation	Restricted Share Units	French, Douglas	5	1/31/2019	30	45.033	96,770	-1,156
TELUS Corporation	Common Shares	Fuller, David	5	1/31/2019	30		49,007	1,532
TELUS Corporation	Common Shares	Fuller, David	5	1/31/2019	30		51,779	2,772
TELUS Corporation	Restricted Share Units	Fuller, David	5	12/31/2018	38		106,847	-49,850
TELUS Corporation	Restricted Share Units	Fuller, David	5	1/31/2019	30		108,140	1,293
TELUS Corporation	Restricted Share Units	Fuller, David	5	1/31/2019	30	45.033	104,890	-3,250
TELUS Corporation	Restricted Share Units	Geheran, Tony	5	1/31/2019	30		89,794	1,074
TELUS Corporation	Restricted Share Units	Geheran, Tony	5	1/31/2019	30	45.033	87,323	-2,471
TELUS Corporation	Restricted Share Units	Gratton, Francois	5	1/31/2019	30		87,714	1,049
TELUS Corporation	Restricted Share Units	Gratton, Francois	5	1/31/2019	30	45.033	85,076	-2,638
TELUS Corporation	Restricted Share Units	McIntosh, Sandy	5	1/31/2019	30		96,690	1,156
TELUS Corporation	Restricted Share Units	McIntosh, Sandy	5	1/31/2019	30	45.033	95,488	-1,202
TELUS Corporation	Restricted Share Units	Spadotto, Eros	7	1/31/2019	30		109,586	1,310
TELUS Corporation	Restricted Share Units	Spadotto, Eros	7	1/31/2019	30	45.033	106,316	-3,270
Tempus Capital Inc.	Options	Tanz, Bernie	4	5/28/2015	00			
Tempus Capital Inc.	Options	Tanz, Bernie	4	10/17/2017	50	0.1	100,000	100,000
THE CALDWELL PARTNERS INTERNATIONAL INC.	Common Shares	Morris, Darcy	4	1/29/2019	10	1.303	3,096,800	1,056,700
The Green Organic Dutchman Holdings Ltd.	Options	Ravinder, Kumar	5	1/14/2019	50	2.76	600,000	600,000
The Green Organic Dutchman Holdings Ltd.	Options	Ravinder, Kumar	5	1/21/2019	50	2.76		600,000
The Supreme Cannabis Company, Inc.	Common Shares	Azeez, Omer Hyder	5	9/25/2017	00			
The Supreme Cannabis Company, Inc.	Common Shares	Azeez, Omer Hyder	5	1/22/2019	10	1.7	14,405	14,405
The Supreme Cannabis Company, Inc.	Common Shares	Walters, Scott Robertson	4	4/25/2016	00			
The Supreme Cannabis Company, Inc.	Common Shares	Walters, Scott Robertson	4	1/23/2019	10	1.72	5,000	5,000

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The Bank	Toronto-Dominion	Rights Deferred Share Units (DSU)	Bennett, William E.	4, 7	1/31/2019	46	73.73	103,215	89
The Bank	Toronto-Dominion	Rights Deferred Share Units (DSU)	Brinkley, Amy Woods	4, 7	1/31/2019	46	73.73	48,977	500
The Bank	Toronto-Dominion	Rights Deferred Share Units (DSU)	Brinkley, Amy Woods	4, 7	1/31/2019	46	73.73	49,180	203
The Bank	Toronto-Dominion	Rights Deferred Share Units (DSU)	Ferguson, Brian Charles	4	1/31/2019	46	73.73	16,209	483
The Bank	Toronto-Dominion	Rights Deferred Share Units (DSU)	Goggins, Colleen	4	1/31/2019	46	73.73	31,470	449
The Bank	Toronto-Dominion	Rights Deferred Share Units (DSU)	Haddad, Mary Jo	4	1/31/2019	46	73.73	14,545	229
The Bank	Toronto-Dominion	Rights Deferred Share Units (DSU)	Halde, Jean-Rene	4	1/31/2019	46	73.73	12,463	449
The Bank	Toronto-Dominion	Rights Deferred Share Units (DSU)	Levitt, Brian	4	1/31/2019	46	73.73	90,959	788
The Bank	Toronto-Dominion	Rights Deferred Share Units (DSU)	MacGibbon, Alan	4, 7	1/31/2019	46	73.73	28,868	470
The Bank	Toronto-Dominion	Rights Deferred Share Units (DSU)	Maidment, Karen	4	1/31/2019	46	73.73	39,699	610
The Bank	Toronto-Dominion	Rights Deferred Share Units (DSU)	Miller, Irene Ruth	4	1/31/2019	46	73.73	79,565	483
The Bank	Toronto-Dominion	Rights Deferred Share Units (DSU)	Mohamed, Nadir	4	1/31/2019	46	73.73	55,434	381
The Bank	Toronto-Dominion	Rights Deferred Share Units (DSU)	Mongeau, Claude	4	1/31/2019	46	73.73	15,610	449
The Bank	Toronto-Dominion	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/2/2019	38	69.63	300,000	300,000
The Bank	Toronto-Dominion	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/2/2019	38	69.63	0	-300,000
The Bank	Toronto-Dominion	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/3/2019	38	69.63	300,000	300,000
The Bank	Toronto-Dominion	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/3/2019	38	69.63	0	-300,000
The Bank	Toronto-Dominion	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/4/2019	38	69.62	300,000	300,000
The Bank	Toronto-Dominion	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/4/2019	38	69.62	0	-300,000
The Bank	Toronto-Dominion	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/7/2019	38	69.62	300,000	300,000
The Bank	Toronto-Dominion	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/7/2019	38	69.62	0	-300,000
The Bank	Toronto-Dominion	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/9/2019	38	69.62	300,000	300,000
The Bank	Toronto-Dominion	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/9/2019	38	69.62	0	-300,000
The Bank	Toronto-Dominion	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/10/2019	38	69.63	300,000	300,000
The Bank	Toronto-Dominion	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/10/2019	38	69.63	0	-300,000
The Bank	Toronto-Dominion	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/11/2019	38	69.62	300,000	300,000
The Bank	Toronto-Dominion	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/11/2019	38	69.62	0	-300,000
The Bank	Toronto-Dominion	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/14/2019	38	69.61	300,000	300,000
The Bank	Toronto-Dominion	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/14/2019	38	69.61	0	-300,000
The Bank	Toronto-Dominion	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/15/2019	38	69.62	300,000	300,000
The Bank	Toronto-Dominion	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/15/2019	38	69.62	0	-300,000
The Bank	Toronto-Dominion	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/16/2019	38	69.63	300,000	300,000
The Bank	Toronto-Dominion	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/16/2019	38	69.63	0	-300,000

**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
The Toronto-Dominion Bank	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/17/2019	38	69.62	300,000	300,000
The Toronto-Dominion Bank	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/17/2019	38	69.62	0	-300,000
The Toronto-Dominion Bank	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/18/2019	38	69.64	300,000	300,000
The Toronto-Dominion Bank	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/18/2019	38	69.64	0	-300,000
The Toronto-Dominion Bank	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/21/2019	38	69.64	300,000	300,000
The Toronto-Dominion Bank	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/21/2019	38	69.64	0	-300,000
The Toronto-Dominion Bank	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/22/2019	38	69.63	300,000	300,000
The Toronto-Dominion Bank	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/22/2019	38	69.63	0	-300,000
The Toronto-Dominion Bank	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/23/2019	38	69.62	300,000	300,000
The Toronto-Dominion Bank	Common Shares CUSIP 891160 50 9	The Toronto-Dominion Bank	1	1/23/2019	38	69.62	0	-300,000
The Yield Growth Corp.	Common Shares	Glance Technologies Inc.	3	1/28/2019	10	0.465	8,520,000	-20,000
The Yield Growth Corp.	Common Shares	Glance Technologies Inc.	3	1/29/2019	10	0.455	8,500,000	-20,000
The Yield Growth Corp.	Common Shares	Glance Technologies Inc.	3	1/30/2019	10	0.48	8,480,000	-20,000
The Yield Growth Corp.	Common Shares	Glance Technologies Inc.	3	1/31/2019	10	0.51	8,460,000	-20,000
The Yield Growth Corp.	Common Shares	Glance Technologies Inc.	3	2/1/2019	10	0.87	8,440,000	-20,000
theScore, Inc.	Options	Albright, John	3, 4	1/23/2019	50		440,000	100,000
theScore, Inc.	Options	Lean, Ralph E.	4	1/23/2019	50		480,000	100,000
theScore, Inc.	Subordinate Voting Shares - Class A	Lean, Ralph E.	4	12/31/2018	30	0.21	136,502	38,139
theScore, Inc.	Options	Levy, Benjamin David	4, 5	1/23/2019	50		3,500,000	500,000
theScore, Inc.	Subordinate Voting Shares - Class A	Levy, Benjamin David	4, 5	12/31/2018	30	0.22	1,342,860	155,242
theScore, Inc.	Options	Levy, John S.	3, 4, 5	1/23/2019	50		7,000,000	600,000
theScore, Inc.	Subordinate Voting Shares - Class A	Levy, John S.	3, 4, 5	12/31/2018	30	0.22	5,331,517	297,052
theScore, Inc.	Warrants Expire March 5, 2018	Levy, John S.	3, 4, 5	3/5/2018	55		0	-1,492,000
theScore, Inc.	Options	Schneider, Lorry H.	4	1/23/2019	50		440,000	100,000
theScore, Inc.	Subordinate Voting Shares - Class A	Schneider, Lorry H.	4	12/31/2018	30	0.21	181,670	72,744
theScore, Inc.	Options	Scholes, Mark A.	4	1/23/2019	50		480,000	100,000
theScore, Inc.	Subordinate Voting Shares - Class A	Scholes, Mark A.	4	12/31/2018	30	0.21	148,234	38,140
theScore, Inc.	Options	Thomson, William	4	1/23/2019	50		480,000	100,000
theScore, Inc.	Subordinate Voting Shares - Class A	Thomson, William	4	12/31/2018	30	0.21	145,002	38,139
theScore, Inc.	Options	Zega, Mark	4	1/23/2019	50		480,000	100,000
theScore, Inc.	Subordinate Voting Shares - Class A	Zega, Mark	4	12/31/2018	30	0.21	156,502	43,139
Thomson Corporation	Reuters Common Shares	Masterson, Neil Thomas	7, 5	1/31/2019	30		25,391	1,606
Thomson Corporation	Reuters Deferred Share Units	Masterson, Neil Thomas	7, 5	1/31/2019	30	48.31	24,763	-3,060
ThreeD Inc.(formerly Brownstone Energy Inc.)	Capital Common Shares	LONE, ALLEN	4	1/23/2019	10	0.08	453,666	-150,000
Titan Mining Corporation	Common Shares	Warke, Richard William	4	1/31/2019	10	1	5,003,933	500,000

**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Toachi Mining Inc.	Convertible Debentures into common shares	Goodman, Jonathan Carter	4, 5	1/23/2019	16			\$325,000
Toachi Mining Inc.	Convertible Debentures into common shares	Goodman, Jonathan Carter	4, 5	1/23/2019	16		\$325,000	\$325,000
Toachi Mining Inc.	Convertible Debentures into common shares	Goodman, Jonathan Carter	4, 5	1/24/2019	16			\$325,000
Torex Gold Resources Inc.	Common Shares	Batoff, Mary Delores	5	1/29/2019	57		9,510	846
Torex Gold Resources Inc.	Rights Performance Share Units under Employee Share Unit Plan	Batoff, Mary Delores	5	1/24/2019	56		17,496	6,839
Torex Gold Resources Inc.	Rights Performance Share Units under Employee Share Unit Plan	Batoff, Mary Delores	5	1/29/2019	57		16,650	-846
Torex Gold Resources Inc.	Rights Restricted Share Units under Employee Share Unit Plan	Batoff, Mary Delores	5	1/24/2019	56		11,100	4,559
Torex Gold Resources Inc.	Common Shares	Crombie, James A.	4	1/24/2019	57		38,106	919
Torex Gold Resources Inc.	Options	Crombie, James A.	4	1/24/2019	50		88,917	8,352
Torex Gold Resources Inc.	Rights Restricted Share Units ("RSU's")	Crombie, James A.	4	1/24/2019	57		4,013	-919
Torex Gold Resources Inc.	Rights Restricted Share Units ("RSU's")	Crombie, James A.	4	1/24/2019	56		11,212	7,199
Torex Gold Resources Inc.	Common Shares	Davis, Franklin Lorie	4	1/31/2019	10	14.3	15,000	-12,902
Torex Gold Resources Inc.	Rights Restricted Share Units ("RSU's")	Davis, Franklin Lorie	4	1/24/2019	56		16,310	10,799
Torex Gold Resources Inc.	Rights Restricted Share Units ("RSU's")	Davis, Franklin Lorie	4	1/24/2019	59		5,511	-10,799
Torex Gold Resources Inc.	Common Shares	Fennell, David	4	1/24/2019	57			4,013
Torex Gold Resources Inc.	Common Shares	Fennell, David	4	1/24/2019	57		5,390	4,013
Torex Gold Resources Inc.	Common Shares	Fennell, David	4	1/30/2019	10	14.05	1,390	-4,000
Torex Gold Resources Inc.	Options	Fennell, David	4	1/24/2019	50		104,043	16,704
Torex Gold Resources Inc.	Rights Restricted Share Units ("RSU's")	Fennell, David	4	1/24/2019	57		1,378	-4,013
Torex Gold Resources Inc.	Rights Restricted Share Units ("RSU's")	Fennell, David	4	1/24/2019	56		4,978	3,600
Torex Gold Resources Inc.	Rights Performance Share Units under Employee Share Unit Plan	Kuzenko, Jody Lynne Mary	5	1/24/2019	56		62,645	29,020
Torex Gold Resources Inc.	Rights Restricted Share Units under Employee Share Unit Plan	Kuzenko, Jody Lynne Mary	5	1/24/2019	56		41,764	19,347
Torex Gold Resources Inc.	Rights Performance Share Units under Employee Share Unit Plan	Loyer, Harold Bernard	6	1/24/2019	56		32,404	10,947
Torex Gold Resources Inc.	Rights Restricted Share Units under Employee Share Unit Plan	Loyer, Harold Bernard	6	1/24/2019	56		23,534	7,298

**Insider Reporting**

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Torex Inc.	Gold	Resources	Common Shares	MacGibbon, Terry		4	1/25/2019	10	14	99,800	-58,000
Torex Inc.	Gold	Resources	Common Shares	MacGibbon, Terry		4	1/28/2019	10	14.01	57,800	-42,000
Torex Inc.	Gold	Resources	Rights Restricted Share Units ("RSU's")	MacGibbon, Terry		4	1/24/2019	56		10,799	10,799
Torex Inc.	Gold	Resources	Rights Restricted Share Units ("RSU's")	MacGibbon, Terry		4	1/24/2019	59		0	-10,799
Torex Inc.	Gold	Resources	Common Shares	Murphy, Darren	Michael	4	1/24/2019	57		13,554	12,177
Torex Inc.	Gold	Resources	Common Shares	Murphy, Darren	Michael	4	1/24/2019	51	11.5	63,554	50,000
Torex Inc.	Gold	Resources	Common Shares	Murphy, Darren	Michael	4	1/29/2019	10	13.978	42,977	-20,577
Torex Inc.	Gold	Resources	Options	Murphy, Darren	Michael	4	1/24/2019	51		27,979	-50,000
Torex Inc.	Gold	Resources	Rights Restricted Share Units ("RSU's")	Murphy, Darren	Michael	4	1/24/2019	57		18,772	-1,378
Torex Inc.	Gold	Resources	Rights Restricted Share Units ("RSU's")	Murphy, Darren	Michael	4	1/24/2019	56		29,571	10,799
Torex Inc.	Gold	Resources	Rights Restricted Share Units ("RSU's")	Murphy, Darren	Michael	4	1/24/2019	57		18,772	-10,799
Torex Inc.	Gold	Resources	Rights Performance Share Units under Employee Share Unit Plan	Proudfoot, McNabb	Dawson	5	1/24/2019	56		29,220	9,585
Torex Inc.	Gold	Resources	Rights Restricted Share Units under Employee Share Unit Plan	Proudfoot, McNabb	Dawson	5	1/24/2019	56		21,262	6,390
Torex Inc.	Gold	Resources	Rights Performance Share Units under Employee Share Unit Plan	Sanchez, Micaela	Gabriela	5	1/24/2019	56		14,520	5,964
Torex Inc.	Gold	Resources	Rights Restricted Share Units under Employee Share Unit Plan	Sanchez, Micaela	Gabriela	5	1/24/2019	56		9,680	3,976
Torex Inc.	Gold	Resources	Options	Shaver, William M		4	1/24/2019	50		28,637	8,352
Torex Inc.	Gold	Resources	Rights Restricted Share Units ("RSU's")	Shaver, William M		4	1/24/2019	56		18,899	7,199
Torex Inc.	Gold	Resources	Rights Performance Share Units under Employee Share Unit Plan	Stanford, McLae	Frederick	4, 5	1/24/2019	56		174,773	79,916
Torex Inc.	Gold	Resources	Rights Restricted Share Units under Employee Share Unit Plan	Stanford, McLae	Frederick	4, 5	1/24/2019	56		116,515	53,277
Torex Inc.	Gold	Resources	Common Shares	Stephen, Elizabeth	Anne	5	1/25/2019	51	11.5	11,166	10,000
Torex Inc.	Gold	Resources	Common Shares	Stephen, Elizabeth	Anne	5	1/25/2019	10	11.5		10,000
Torex Inc.	Gold	Resources	Common Shares	Stephen, Elizabeth	Anne	5	1/25/2019	10	14.234		10,000
Torex Inc.	Gold	Resources	Common Shares	Stephen, Elizabeth	Anne	5	1/25/2019	10	14.234	1,166	-10,000
Torex Inc.	Gold	Resources	Common Shares	Stephen, Elizabeth	Anne	5	1/28/2019	51	11.5	11,166	10,000
Torex Inc.	Gold	Resources	Common Shares	Stephen, Elizabeth	Anne	5	1/28/2019	10	14.045	1,166	-10,000
Torex Inc.	Gold	Resources	Options	Stephen, Elizabeth	Anne	5	1/25/2019	51		26,553	-10,000
Torex Inc.	Gold	Resources	Options	Stephen, Elizabeth	Anne	5	1/28/2019	51		16,553	-10,000

**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Torex Gold Resources Inc.	Rights Performance Share Units under Employee Share Unit Plan	Stephen, Anne Elizabeth	5	1/24/2019	56		19,278	8,085
Torex Gold Resources Inc.	Rights Restricted Share Units under Employee Share Unit Plan	Stephen, Anne Elizabeth	5	1/24/2019	56		12,852	5,390
Torex Gold Resources Inc.	Rights Performance Share Units under Employee Share Unit Plan	Thomas, Steven John	5	1/24/2019	56		116,353	30,151
Torex Gold Resources Inc.	Rights Restricted Share Units under Employee Share Unit Plan	Thomas, Steven John	5	1/24/2019	56		79,361	20,101
Torex Gold Resources Inc.	Rights Performance Share Units under Employee Share Unit Plan	Thorpe, Mark Bramley	5	1/24/2019	56		21,032	8,845
Torex Gold Resources Inc.	Rights Restricted Share Units under Employee Share Unit Plan	Thorpe, Mark Bramley	5	1/24/2019	56		14,022	5,897
Torex Gold Resources Inc.	Options	Wademan, Anne Elizabeth	4	1/24/2019	50		26,930	4,176
Torex Gold Resources Inc.	Rights Restricted Share Units ("RSU's")	Wademan, Anne Elizabeth	4	1/24/2019	56		19,610	8,999
Total Energy Services Inc.	Common Shares	Total Energy Services Inc	1	1/30/2019	38		0	-24,100
Tourmaline Oil Corp.	Common Shares	Rose, Mike	5	1/31/2019	10	17.918	10,499,740	2,500
Tourmaline Oil Corp.	Common Shares	Rose, Mike	5	2/1/2019	10	17.878	10,502,240	2,500
Tourmaline Oil Corp.	Common Shares	Rose, Mike	5	2/1/2019	10	17.803	10,504,740	2,500
TransCanada PipeLines Limited	Common Shares	TransCanada Corporation	3	1/31/2019	11	55.61	891,181,548	3,848,228
Transcontinental Inc.	Participation Units d'actions différées (UAD-administrateurs) / (DSU-directors)	Brues, Peter	4	1/27/2019	56	20.93	2,073	1,218
Transcontinental Inc.	Participation Units d'actions différées (UAD-administrateurs) / (DSU-directors)	Cote, Jacynthe	4	1/27/2019	56	20.93	13,021	1,338
Transcontinental Inc.	Participation Units d'actions différées (UAD-administrateurs) / (DSU-directors)	Fortin, Richard	4	1/27/2019	56	20.93	94,633	1,517
Transcontinental Inc.	Participation Units d'actions différées (UAD-administrateurs) / (DSU-directors)	Leduc, Yves	4	1/27/2019	56	20.93	5,580	1,194
Transcontinental Inc.	Participation Units d'actions différées (UAD-administrateurs) / (DSU-directors)	Martini, Anna	4	1/27/2019	56	20.93	45,242	1,374
Transcontinental Inc.	Participation Units d'actions différées (UAD-administrateurs) / (DSU-directors)	Plourde, Mario	4	1/27/2019	56	20.93	17,374	1,290
Transcontinental Inc.	Participation Units d'actions différées (UAD-administrateurs) / (DSU-directors)	Raymond, Jean	4	1/27/2019	56	20.93	7,693	1,218
Transcontinental Inc.	Participation Units d'actions différées (UAD-administrateurs) / (DSU-directors)	Thabet, Annie	4	1/27/2019	56	20.93	11,341	669
Traverse Energy Ltd.	Common Shares	smith, laurie james	3, 4, 5	1/25/2019	10	0.05	8,130,206	50,000
Treasury Metals Inc.	Common Shares	Ferron, Greg	5	1/25/2019	10	0.3	458,600	15,000
Treasury Metals Inc.	Common Shares	Ferron, Greg	5	1/28/2019	10	0.3	473,600	15,000

**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Trilogy International Partners Inc.	Common Shares	Mohamed, Nadir	4	5/4/2018	30	4.2675		3,824
Trilogy International Partners Inc.	Common Shares	Mohamed, Nadir	4	5/4/2018	30	4.2675		3,824
Trilogy International Partners Inc.	Common Shares	Mohamed, Nadir	4	5/4/2018	30	4.2675		3,824
Triumph Gold Corp.	Common Shares	Palisade Global Investments Ltd.	3	1/28/2019	10	0.44	14,440,833	4,000
Triumph Gold Corp.	Common Shares	Palisade Global Investments Ltd.	3	1/28/2019	10	0.445	14,444,833	4,000
Triumph Gold Corp.	Common Shares	Palisade Global Investments Ltd.	3	1/29/2019	10	0.435	14,448,833	4,000
Triumph Gold Corp.	Common Shares	Palisade Global Investments Ltd.	3	1/29/2019	10	0.4365	14,453,833	5,000
Triumph Gold Corp.	Common Shares	Palisade Global Investments Ltd.	3	1/29/2019	10	0.445	14,457,833	4,000
Triumph Gold Corp.	Common Shares	Palisade Global Investments Ltd.	3	1/29/2019	10	0.455	14,467,833	10,000
Triumph Gold Corp.	Common Shares	Palisade Global Investments Ltd.	3	1/29/2019	10	0.482	14,472,833	5,000
Triumph Gold Corp.	Common Shares	Palisade Global Investments Ltd.	3	1/31/2019	10	0.454	14,482,833	10,000
Triumph Gold Corp.	Common Shares	Palisade Global Investments Ltd.	3	1/31/2019	10	0.455	14,502,833	20,000
Troilus Gold Corp. (formerly Pitchblack Resources Ltd.)	Common Shares	Sulliden Mining Capital Inc.	3	1/10/2018	10	1.8074	15,175,000	25,000
Troilus Gold Corp. (formerly Pitchblack Resources Ltd.)	Common Shares	Sulliden Mining Capital Inc.	3	3/9/2018	11	1.64	14,443,293	-731,707
Troilus Gold Corp. (formerly Pitchblack Resources Ltd.)	Common Shares	Sulliden Mining Capital Inc.	3	1/25/2019	10	0.645	8,443,293	-1,000,000
Troilus Gold Corp. (formerly Pitchblack Resources Ltd.)	Common Shares	Sulliden Mining Capital Inc.	3	1/28/2019	10	0.65	8,040,793	-402,500
Troilus Gold Corp. (formerly Pitchblack Resources Ltd.)	Common Shares	Sulliden Mining Capital Inc.	3	1/29/2019	10	0.65	7,865,793	-175,000
Troilus Gold Corp. (formerly Pitchblack Resources Ltd.)	Common Shares	Sulliden Mining Capital Inc.	3	1/29/2019	10	0.65	7,765,793	-100,000
Troilus Gold Corp. (formerly Pitchblack Resources Ltd.)	Common Shares	Sulliden Mining Capital Inc.	3	1/29/2019	10	0.65	7,575,000	-190,793
Troilus Gold Corp. (formerly Pitchblack Resources Ltd.)	Common Shares	Sulliden Mining Capital Inc.	3	6/22/2016	00			
Troilus Gold Corp. (formerly Pitchblack Resources Ltd.)	Common Shares	Sulliden Mining Capital Inc.	3	6/22/2016	00			
Troilus Gold Corp. (formerly Pitchblack Resources Ltd.)	Common Shares	Sulliden Mining Capital Inc.	3	3/9/2018	11	1.64		783,293
Troilus Gold Corp. (formerly Pitchblack Resources Ltd.)	Common Shares	Sulliden Mining Capital Inc.	3	3/9/2018	11	1.64		783,293
True North Commercial Real Estate Investment Trust	Trust Units	Allison, Margaret Ann	5	12/31/2018	30	6.2269	1,073	89
True North Commercial Real Estate Investment Trust	Trust Units	Cardy, Roland	4	12/31/2018	30	6.2269	30,212	26
True North Commercial Real Estate Investment Trust	Trust Units	Drimmer, Daniel	3, 4	12/31/2018	30	6.2269	4,113,448	120,233
True North Commercial Real Estate Investment Trust	Trust Units	Drimmer, Daniel	3, 4	12/31/2018	30	6.2269	4,146,543	33,095



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True North Commercial Real Estate Investment Trust	Trust Units	Drimmer, Daniel	3, 4	12/31/2018	30	6.2269	116,124	8,540
True North Commercial Real Estate Investment Trust	Trust Units	Drimmer, Daniel	3, 4	12/31/2018	30	6.2269	133,405	17,281
True North Commercial Real Estate Investment Trust	Trust Units	Ossip, Alon Samuel	4	12/31/2018	30	6.2269	320,288	43,788
True North Commercial Real Estate Investment Trust	Trust Units	Poklar, Sandy Ivan	4	12/31/2018	30	6.2269	2,641	62
True North Commercial Real Estate Investment Trust	Trust Units	Poklar, Sandy Ivan	4	12/31/2018	30	6.2269	21,898	1,030
True North Commercial Real Estate Investment Trust	Trust Units	Sherren, Tracy	4, 5	12/31/2018	30	6.2269	12,153	1,101
U.S. Financials Income Fund	Trust Units Class A (CAD \$)	World Financial Split Corp.	8	1/30/2019	10	7.1132	171,100	-1,900
UGE International Ltd.	Options	Shah, Pratik	5	1/31/2019	52		0	-200,000
Uni-Select Inc.	Unités d'actions différées (UAD) / Deferred Share Unit Plan	Courville, André	4, 5	2/1/2019	56	19.43	42,532	2,573
Upco International Inc.	Common Shares	COSERFI s.r.l.	3	1/25/2019	11	0.075		-5,000,000
Upco International Inc.	Common Shares	COSERFI s.r.l.	3	1/25/2019	11	0.075	18,140,840	-1,000,000
Uranium Energy Corp.	Common Shares	ABRAHAM, Edward Spencer	4	2/1/2019	46	1.3	127,837	2,500
Uranium Energy Corp.	Common Shares	ABRAHAM, Edward Spencer	4	2/1/2019	46	1.3	128,991	1,154
Uranium Energy Corp.	Common Shares	Ballesta, Gloria	4	2/1/2019	46	1.3	1,806	913
Uranium Energy Corp.	Common Shares	Della Volpe, Vincent	4	2/1/2019	46	1.3	147,423	1,154
Uranium Energy Corp.	Common Shares	Kong, David	4	2/1/2019	46	1.3	70,230	1,141
Uranium Energy Corp.	Common Shares	MANI, GANPAT	4	2/1/2019	46	1.3	74,379	1,154
Uranium Energy Corp.	Common Shares	Melbye, Scott Eric	5	2/1/2019	46	1.3	234,599	2,826
Uranium Energy Corp.	Common Shares	Obara, Pat	5	2/1/2019	46	1.3	345,627	1,337
Valener Inc.	Common Shares	Bell, Mary-Ann	4	1/15/2018	35	21.78	7,869	102
Valener Inc.	Common Shares	Bell, Mary-Ann	4	4/16/2018	35	19.98	10,011	142
Valener Inc.	Common Shares	Bell, Mary-Ann	4	7/16/2018	35	19.83	10,156	145
Valener Inc.	Common Shares	Bell, Mary-Ann	4	10/15/2018	35	18.08	10,318	162
VALEO PHARMA INC.	Common Shares Class A	Manitex Capital Inc.	3	2/1/2019	35	0.4	20,166,288	-1,228,747
Vecima Networks Inc.	Common Shares	Vecima Networks Inc.	1	1/28/2019	38		1,100	-8,128
Vecima Networks Inc.	Common Shares	Vecima Networks Inc.	1	1/31/2019	38		0	-1,100
Velocity Minerals Ltd.	Common Shares	Kopple, Robert Charles	3	1/29/2019	10	0.209	637,000	50,000
Ventripoint Diagnostics Ltd. (formerly Luca Capital Inc.)	Debentures	Adams, George	4, 5	1/25/2019	11	0.155	\$233,050	\$233,000
Ventripoint Diagnostics Ltd. (formerly Luca Capital Inc.)	Warrants	Adams, George	4, 5	1/25/2019	11		3,968,218	1,398,000
Vermilion Energy Inc.	Common Shares	Donadeo, Lorenzo	4, 5	12/31/2018	30	41.319	2,739,294	7,332
Vermilion Energy Inc.	Rights Share Awards	Donadeo, Lorenzo	4, 5	12/31/2018	30	40.984	12,006	694
Vermilion Energy Inc.	Common Shares	Engbloom, Robert John	5	12/31/2018	30	40.742	34,713	16
Vermilion Energy Inc.	Rights Share Awards	Engbloom, Robert John	5	12/31/2018	30	41.169	9,652	558
Vermilion Energy Inc.	Common Shares	Hergott, Terrance Gerald	5	12/31/2018	30	40.912	39,436	2,890
Vermilion Energy Inc.	Rights Share Awards	Hergott, Terrance Gerald	5	12/31/2018	30	41.169	21,751	1,255
Vermilion Energy Inc.	Common Shares	Jasinski, Mona Jean	5	12/31/2018	30	41.093	32,408	1,467
Vermilion Energy Inc.	Common Shares	Jasinski, Mona Jean	5	1/28/2019	10	31.134	35,238	2,830
Vermilion Energy Inc.	Rights Share Awards	Jasinski, Mona Jean	5	12/31/2018	30	41.169	54,662	3,156
Vermilion Energy Inc.	Rights Share Awards	Knickel, Carin Shirley	4	12/31/2018	30	36.86	9,060	226

**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/ Disposed
Vermilion Energy Inc.	Common Shares	Leiker, Loren Michael	4	12/31/2018	30	41.523	19,384	1,022
Vermilion Energy Inc.	Rights Share Awards	Leiker, Loren Michael	4	12/31/2018	30	41.169	9,652	558
Vermilion Energy Inc.	Common Shares	Macdonald, Larry	4	12/31/2018	30	42.895	60,492	34
Vermilion Energy Inc.	Rights Share Awards	Macdonald, Larry	4	12/31/2018	30	41.169	10,829	626
Vermilion Energy Inc.	Common Shares	Michaleski, Robert B.	4	12/31/2018	30	41.312	11,797	227
Vermilion Energy Inc.	Rights Share Awards	Michaleski, Robert B.	4	12/31/2018	30	40.984	8,746	500
Vermilion Energy Inc.	Common Shares	Roby, William	4	12/31/2018	30	40.145	2,868	113
Vermilion Energy Inc.	Rights Share Awards	Roby, William	4	12/31/2018	30	40.738	8,746	500
Vermilion Energy Inc.	Common Shares	Schut, Gerard	5	11/27/2018	10	24.67	44,180	2,000
Vermilion Energy Inc.	Common Shares	Schut, Gerard	5	12/10/2018	10	22.7	45,180	1,000
Vermilion Energy Inc.	Common Shares	Schut, Gerard	5	12/14/2018	10	22	46,180	1,000
Vermilion Energy Inc.	Common Shares	Schut, Gerard	5	12/17/2018	10	21	47,180	1,000
Vermilion Energy Inc.	Common Shares	Tan, Jenson Jit-Chang	5	12/31/2018	30	41.084	34,888	1,702
Vermilion Energy Inc.	Rights Share Awards	Tan, Jenson Jit-Chang	5	12/31/2018	30	41.237	25,471	1,434
Vermilion Energy Inc.	Common Shares	Williams, Catherine L.	4	9/6/2018	10	41		1,000
Vermilion Energy Inc.	Common Shares	Williams, Catherine L.	4	12/31/2018	30	41.312	9,649	559
Vermilion Energy Inc.	Common Shares	Williams, Catherine L.	4	9/6/2018	10	41	2,500	1,000
Vermilion Energy Inc.	Rights Share Awards	Williams, Catherine L.	4	12/31/2018	30	41.169	9,653	558
VersaBank	Common Shares	Johnston, Joanne Marie	5	1/30/2019	10	7.48	3,970	100
VersaBank	Common Shares	Johnston, Joanne Marie	5	1/30/2019	10	7.5	5,470	1,500
VersaBank	Common Shares	Johnston, Joanne Marie	5	1/30/2019	10	7.54	6,570	1,100
VersaBank	Common Shares	Johnston, Joanne Marie	5	1/30/2019	10	7.58	7,870	1,300
VersaBank	Common Shares	TAYLOR, DAVID ROY	4, 5	1/31/2019	10	7.49	351,200	200
Victoria Gold Corp. (formerly Victoria Resource Corporation)	Options	Ayranto, Mark	5	1/25/2019	50	0.5	2,671,817	700,000
Victoria Gold Corp. (formerly Victoria Resource Corporation)	Options	George, Anthony Paul	5	1/25/2019	50	0.5	1,800,000	600,000
Victoria Gold Corp. (formerly Victoria Resource Corporation)	Options	Gray, Paul Dunstan	5	1/25/2019	50	0.5	1,340,000	400,000
Victoria Gold Corp. (formerly Victoria Resource Corporation)	Options	Harvey, T. Sean	4	1/25/2019	50	0.5	2,280,000	620,000
Victoria Gold Corp. (formerly Victoria Resource Corporation)	Options	Hill, Christopher Thomas	4	1/25/2019	50	0.5	1,730,000	430,000
Victoria Gold Corp. (formerly Victoria Resource Corporation)	Options	MacLachlan, Letha	4	12/1/2018	00			
Victoria Gold Corp. (formerly Victoria Resource Corporation)	Options	MacLachlan, Letha	4	1/25/2019	50	0.5	350,000	350,000
Victoria Gold Corp. (formerly Victoria Resource Corporation)	Options	McConnell, John Charles	4, 5	1/25/2019	50	0.5	4,210,000	1,000,000
Victoria Gold Corp. (formerly Victoria Resource Corporation)	Options	McInnis, Michael D.	4	1/25/2019	50	0.5	2,175,000	390,000
Victoria Gold Corp. (formerly Victoria Resource Corporation)	Options	Perron, Jacques	6	1/25/2019	50	0.5	780,000	430,000
Victoria Gold Corp. (formerly Victoria Resource Corporation)	Options	Rendall, Marty	5	1/25/2019	50	0.5	2,880,000	700,000
Victoria Gold Corp. (formerly Victoria Resource Corporation)	Options	Roosen, Sean	4, 6	1/25/2019	50	0.5	730,000	380,000

**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Victoria Gold Corp. (formerly Victoria Resource Corporation)	Options	Rouleau, David Kenneth	5	1/25/2019	50	0.5	600,000	100,000
VIQ Solutions Inc.	Common Shares	Kempff, George Peter	5	1/28/2019	51	0.07	1,148,119	102,500
VIQ Solutions Inc.	Options	Kempff, George Peter	5	1/28/2019	51	0.07	543,055	-102,500
VIQ Solutions Inc.	Common Shares	Macallum, Malcolm John	5	1/28/2019	51	0.07	1,341,500	125,000
Vizsla Resources Corp.	Common Shares	Parry, Craig Andrew	4	12/21/2018	00			
Vizsla Resources Corp.	Common Shares	Parry, Craig Andrew	4	1/22/2019	22			105,000
Vizsla Resources Corp.	Common Shares	Parry, Craig Andrew	4	1/22/2019	22		1,050,001	1,050,001
Wallbridge Mining Company Limited	Common Shares	2176423 Ontario Ltd.	3	1/23/2019	10	0.165	58,244,229	868,000
Wallbridge Mining Company Limited	Common Shares	2176423 Ontario Ltd.	3	1/24/2019	10	0.165	58,269,229	25,000
Wallbridge Mining Company Limited	Common Shares	2176423 Ontario Ltd.	3	1/25/2019	10	0.165	58,282,729	13,500
Wallbridge Mining Company Limited	Common Shares	2176423 Ontario Ltd.	3	1/28/2019	10	0.175	58,569,729	287,000
Wallbridge Mining Company Limited	Common Shares	2176423 Ontario Ltd.	3	1/29/2019	10	0.175	58,580,729	11,000
Wallbridge Mining Company Limited	Options	Pesner, Michael	4	1/28/2019	00			
Wallbridge Mining Company Limited	Options	Pesner, Michael	4	1/28/2019	50		200,000	200,000
Wallbridge Mining Company Limited	Common Shares	Sprott, Eric S.	3	1/23/2019	10	0.165	58,244,229	868,000
Wallbridge Mining Company Limited	Common Shares	Sprott, Eric S.	3	1/24/2019	10	0.165	58,269,229	25,000
Wallbridge Mining Company Limited	Common Shares	Sprott, Eric S.	3	1/25/2019	10	0.165	58,282,729	13,500
Wallbridge Mining Company Limited	Common Shares	Sprott, Eric S.	3	1/28/2019	10	0.175	58,569,729	287,000
Wallbridge Mining Company Limited	Common Shares	Sprott, Eric S.	3	1/29/2019	10	0.175	58,580,729	11,000
Waste Connections, Inc. (formerly Progressive Waste Solutions Ltd.)	Common Shares	Hansen, Eric Olin	5	2/1/2019	00		7,005	
Waste Connections, Inc. (formerly Progressive Waste Solutions Ltd.)	Performance Share Units	Hansen, Eric Olin	5	2/1/2019	00		17,282	
WELL Health Technologies Corp.	Common Shares	Javidan, Amir	5	1/14/2019	00		200,000	
WELL Health Technologies Corp.	Options	Javidan, Amir	5	1/14/2019	00			
WELL Health Technologies Corp.	Options	Javidan, Amir	5	1/22/2019	50		300,000	300,000
WELL Health Technologies Corp.	Restricted Share Units	Javidan, Amir	5	1/14/2019	00			
WELL Health Technologies Corp.	Restricted Share Units	Javidan, Amir	5	1/22/2019	56		200,000	200,000
WELL Health Technologies Corp.	Restricted Share Units	Javidan, Amir	5	1/22/2019	56		440,000	240,000
West Fraser Timber Co. Ltd.	Common Shares	West Fraser Timber Co. Ltd.	1	1/28/2019	38	75.895	60,000	15,000
West Fraser Timber Co. Ltd.	Common Shares	West Fraser Timber Co. Ltd.	1	1/29/2019	38	76.01	75,000	15,000
West Fraser Timber Co. Ltd.	Common Shares	West Fraser Timber Co. Ltd.	1	1/30/2019	38	77.25	90,000	15,000
West Fraser Timber Co. Ltd.	Common Shares	West Fraser Timber Co. Ltd.	1	1/31/2019	38	77.917	105,000	15,000
West Fraser Timber Co. Ltd.	Common Shares	West Fraser Timber Co. Ltd.	1	2/1/2019	38	78.264	120,000	15,000
West Fraser Timber Co. Ltd.	Common Shares	West Fraser Timber Co. Ltd.	1	2/1/2019	38		30,000	-90,000
Western Forest Products Inc.	Common Shares	Western Forest Products Inc.	1	1/2/2019	38	1.9304	506,346	161,900

**Insider Reporting**

Issuer Name	Security	Insider Name	Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/Disposed
Western Forest Products Inc.	Common Shares	Western Forest Products Inc.	1	1/3/2019	38	1.9192	678,569	172,223
Western Forest Products Inc.	Common Shares	Western Forest Products Inc.	1	1/4/2019	38	1.9232	850,792	172,223
Western Forest Products Inc.	Common Shares	Western Forest Products Inc.	1	1/7/2019	38	1.9079	1,023,015	172,223
Western Forest Products Inc.	Common Shares	Western Forest Products Inc.	1	1/8/2019	38	1.9627	1,195,238	172,223
Western Forest Products Inc.	Common Shares	Western Forest Products Inc.	1	1/9/2019	38	2.0377	1,364,638	169,400
Western Forest Products Inc.	Common Shares	Western Forest Products Inc.	1	1/10/2019	38	2.0588	1,536,861	172,223
Western Forest Products Inc.	Common Shares	Western Forest Products Inc.	1	1/11/2019	38	2.0546	1,709,084	172,223
Western Forest Products Inc.	Common Shares	Western Forest Products Inc.	1	1/14/2019	38	2.0321	1,881,307	172,223
Western Forest Products Inc.	Common Shares	Western Forest Products Inc.	1	1/15/2019	38	2.0246	2,000,000	118,693
Western Forest Products Inc.	Common Shares	Western Forest Products Inc.	1	1/31/2019	38		0	-2,000,000
WestJet Airlines Ltd.	Rights Deferred Share Units	Beddoe, Clive	5	12/28/2018	56			67
WestJet Airlines Ltd.	Rights Deferred Share Units	Beddoe, Clive	5	12/28/2018	30		8,174	67
WestJet Airlines Ltd.	Rights Deferred Share Units	Bolton, Hugh John	4	12/28/2018	56			255
WestJet Airlines Ltd.	Rights Deferred Share Units	Bolton, Hugh John	4	12/28/2018	30		31,368	255
WestJet Airlines Ltd.	Rights Deferred Share Units	Brenneman, Ron A.	4	12/28/2018	56			97
WestJet Airlines Ltd.	Rights Deferred Share Units	Brenneman, Ron A.	4	12/28/2018	30		11,927	97
WestJet Airlines Ltd.	Rights Deferred Share Units	Burley, Christopher Michael	4	12/28/2018	56			151
WestJet Airlines Ltd.	Rights Deferred Share Units	Burley, Christopher Michael	4	12/28/2018	30		18,533	151
WestJet Airlines Ltd.	Rights Deferred Share Units	Godfrey, Brett Alan	4	12/28/2018	56			111
WestJet Airlines Ltd.	Rights Deferred Share Units	Godfrey, Brett Alan	4	12/28/2018	30		13,637	111
WestJet Airlines Ltd.	Rights Deferred Share Units	Jackson, Allan William	4	12/28/2018	56			525
WestJet Airlines Ltd.	Rights Deferred Share Units	Jackson, Allan William	4	12/28/2018	30		64,626	525
WestJet Airlines Ltd.	Rights Deferred Share Units	Jackson, Steven Barry	4	12/28/2018	56			389
WestJet Airlines Ltd.	Rights Deferred Share Units	Jackson, Steven Barry	4	12/28/2018	30		47,885	389
WestJet Airlines Ltd.	Rights Deferred Share Units	Menard, L. Jacques	4	12/28/2018	56			204
WestJet Airlines Ltd.	Rights Deferred Share Units	Menard, L. Jacques	4	12/28/2018	30		25,025	204
WestJet Airlines Ltd.	Rights Deferred Share Units	Rennie, Janice Gaye	4	12/28/2018	56			209
WestJet Airlines Ltd.	Rights Deferred Share Units	Rennie, Janice Gaye	4	12/28/2018	30		25,639	209
WestJet Airlines Ltd.	Rights Deferred Share Units	Sheriff, Karen	4	12/28/2018	56			131
WestJet Airlines Ltd.	Rights Deferred Share Units	Sheriff, Karen	4	12/28/2018	30		16,016	131
WSP Global Inc.	Restricted Shares	Langlois, David	5	4/15/2018	35	57.79	2,136	5
WSP Global Inc.	Restricted Shares	Langlois, David	5	7/15/2018	35	69.06	2,140	4
WSP Global Inc.	Restricted Shares	Langlois, David	5	10/15/2018	35	69.22	2,144	4

**Insider Reporting**

Issuer Name	Security		Insider Name		Rel'n	Transaction Date	T/O	Unit Price	Date/Month End Holdings	Acquired/ Disposed
WSP Global Inc.	Restricted Units	Shares	Langlois, David		5	1/15/2019	35	58.4	2,796	5
WSP Global Inc.	Restricted Units	Shares	Langlois, David		5	1/25/2019	59	58.4		721
WSP Global Inc.	Restricted Units	Shares	Langlois, David		5	1/25/2019	59	58.4	2,075	-721
WSP Global Inc.	Restricted Units	Shares	Meyer, Jan Magnus		5	4/15/2018	35	57.79	1,030	7
WSP Global Inc.	Restricted Units	Shares	Meyer, Jan Magnus		5	7/15/2018	35	69.06	1,036	6
WSP Global Inc.	Restricted Units	Shares	Meyer, Jan Magnus		5	10/15/2018	35	69.06	1,042	6
WSP Global Inc.	Restricted Units	Shares	Meyer, Jan Magnus		5	1/15/2019	35	58.4	1,049	7
WSP Global Inc.	Restricted Units	Shares	Meyer, Jan Magnus		5	1/25/2019	59	58.4	0	-1,049
WSP Global Inc.	Restricted Units	Shares	Naysmith, Mark		5	4/15/2018	35	57.79	1,107	7
WSP Global Inc.	Restricted Units	Shares	Naysmith, Mark		5	7/15/2018	35	69.06	1,113	6
WSP Global Inc.	Restricted Units	Shares	Naysmith, Mark		5	10/15/2018	35	69.22	1,119	6
WSP Global Inc.	Restricted Units	Shares	Naysmith, Mark		5	1/15/2019	35	58.4	1,126	7
WSP Global Inc.	Restricted Units	Shares	Naysmith, Mark		5	1/25/2019	59	58.4	0	-1,126
XORTX Therapeutics Inc. (formerly: APAC Resources Inc.)	Common Shares		Davidoff, Allen Warren		4, 5	1/22/2019	10	0.175	4,435,077	1,000
XORTX Therapeutics Inc. (formerly: APAC Resources Inc.)	Common Shares		Rowlands, Bruce	William	4	1/24/2019	10	0.16	277,000	10,000
XORTX Therapeutics Inc. (formerly: APAC Resources Inc.)	Common Shares		Rowlands, Bruce	William	4	1/24/2019	10	0.165	283,500	6,500
XORTX Therapeutics Inc. (formerly: APAC Resources Inc.)	Common Shares		Rowlands, Bruce	William	4	1/25/2019	10	0.17	295,500	12,000
XORTX Therapeutics Inc. (formerly: APAC Resources Inc.)	Common Shares		Rowlands, Bruce	William	4	1/30/2019	10	0.18	304,500	9,000
Yamana Gold Inc.	Common Shares		CAMPBELL, RICHARD		5	1/23/2019	10	3.1	45,155	-2,187
Yamana Gold Inc.	Common Shares		Fernandez-Tobar, Gerardo		5	1/23/2019	10	3.1	110,811	-2,998
Yamana Gold Inc.	Common Shares		Racine, Daniel		5	1/23/2019	10	3.1	270,906	-2,515
Yamana Gold Inc.	Common Shares		Tsakos, Sofia		5	1/23/2019	10	3.1	240,633	-3,311
ZCL Composites Inc.	Options		Bachmeier, Marvin	Ronald	7	9/7/2018	38		35,577	-34,367
Zedcor Energy Inc.	Common Shares		Swanberg, Sylvan	Dean	3, 4, 5	2/1/2019	11	0.0715	11,512,359	145,605
Zonetail Inc.	Common Shares		Crandall, Daniel Gary		5	1/29/2019	10	0.08	210,000	8,000
Zonetail Inc.	Common Shares		Crandall, Daniel Gary		5	1/29/2019	10	0.085	220,000	10,000
Zonetail Inc.	Common Shares		Crandall, Daniel Gary		5	1/29/2019	10	0.095	246,000	26,000
Zonte Metals Inc.	Options		MacEachen, Brian		5	1/28/2019	50	0.29	625,000	150,000

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## Chapter 11

# IPOs, New Issues and Secondary Financings

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### INVESTMENT FUNDS

**Issuer Name:**

RBC Private Canadian Growth and Income Equity Pool  
Principal Regulator – Ontario

**Type and Date:**

Amendment #4 to Final Simplified Prospectus dated  
January 31, 2019

Received on January 31, 2019

**Offering Price and Description:**

Series F and Series O units

**Underwriter(s) or Distributor(s):**

RBC Global Asset Management Inc. (other than Series A)

Royal Mutual Funds Inc. (Series A)

Royal Mutual Funds Inc./RBC Direct Investing Inc.

The Royal Trust Company

RBC Dominion Securities Inc.

Phillips, Hager & North Investment Funds Ltd.

**Promoter(s):**

RBC Global Asset Management Inc. (other than Series A)

**Project #2774740**

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**Issuer Name:**

BMO Balanced Yield Plus ETF Portfolio

BMO Fixed Income Yield Plus ETF Portfolio

BMO Laddered Corporate Bond Fund

Principal Regulator – Ontario

**Type and Date:**

Amendment #3 to Final Simplified Prospectus dated  
January 28, 2019

Received on January 29, 2019

**Offering Price and Description:**

–

**Underwriter(s) or Distributor(s):**

BMO Investments Inc.

**Promoter(s):**

BMO Investments Inc.

**Project #2744768**

**Issuer Name:**

Brompton Split Banc Corp.

Principal Regulator – Ontario

**Type and Date:**

Preliminary Shelf Prospectus (NI 44-102) dated January  
29, 2019

NP 11-202 Preliminary Receipt dated January 30, 2019

**Offering Price and Description:**

Maximum: \$300,000,000

Preferred Shares: \$10.00 and Class A Shares: \$13.12.

**Underwriter(s) or Distributor(s):**

N/A

**Promoter(s):**

N/A

**Project #2868784**

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**Issuer Name:**

Canopy Rivers Inc.

Principal Regulator – Ontario

**Type and Date:**

Preliminary Short Form Prospectus (NI 44-101) dated

Received on February 4, 2019

**Offering Price and Description:**

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**Underwriter(s) or Distributor(s):**

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**Promoter(s):**

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**Project #2871197**

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**Issuer Name:**

Evolve Blockchain ETF

Principal Regulator – Ontario

**Type and Date:**

Amendment #1 to Final Long Form Prospectus dated

January 30, 2019

Received on February 1, 2019

**Offering Price and Description:**

–

**Underwriter(s) or Distributor(s):**

N/A

**Promoter(s):**

Evolve Funds Group Inc.

**Project #2725272**

**Issuer Name:**

Exemplar Tactical Corporate Bond Fund  
Principal Regulator – Ontario

**Type and Date:**

Amendment #2 to Final Simplified Prospectus dated  
January 31, 2019

Received on February 4, 2019

**Offering Price and Description:**

–

**Underwriter(s) or Distributor(s):**

N/A

**Promoter(s):**

Arrow Capital Management Inc.

Project #2780252

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**Issuer Name:**

Franklin Bissett Canadian Equity Fund  
Franklin Bissett Microcap Fund  
Principal Regulator – Ontario

**Type and Date:**

Amendment #4 to the Annual Information Form dated  
February 4, 2019

Received on February 4, 2019

**Offering Price and Description:**

–

**Underwriter(s) or Distributor(s):**

Franklin Templeton Investments Corp.  
Bissett Investment Management, a division of Franklin  
Templeton Investments Corp.

**Promoter(s):**

N/A

Project #2758148

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**Issuer Name:**

Lorica Canadian Fixed Income Fund (formerly Marquest  
Canadian Fixed Income Fund)  
Principal Regulator – Ontario

**Type and Date:**

Amended and Restated to Final Simplified Prospectus  
dated January 28, 2019

Received on January 29, 2019

**Offering Price and Description:**

–

**Underwriter(s) or Distributor(s):**

N/A

**Promoter(s):**

N/A

Project #2864971

**Issuer Name:**

Sphere FTSE Europe Sustainable Yield Index ETF  
Sphere FTSE Canada Sustainable Yield Index ETF  
Principal Regulator – Ontario

**Type and Date:**

Amendment #1 to Final Long Form Prospectus dated  
January 30, 2019

Received on February 1, 2019

**Offering Price and Description:**

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**Underwriter(s) or Distributor(s):**

N/A

**Promoter(s):**

N/A

Project #2736046

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**Issuer Name:**

Timbercreek Global Real Estate Income Fund  
Principal Regulator – Ontario

**Type and Date:**

Amended and Restated to Final Simplified Prospectus  
dated January 24, 2019

Received on January 30, 2019

**Offering Price and Description:**

–

**Underwriter(s) or Distributor(s):**

N/A

**Promoter(s):**

N/A

Project #2782123



**Issuer Name:**

AGFiQ Enhanced Core Canadian Equity ETF (previously, QuantShares Enhanced Core Canadian Equity ETF)  
AGFiQ Enhanced Core Emerging Markets Equity ETF (previously, QuantShares Enhanced Core Emerging Markets Equity ETF)  
AGFiQ Enhanced Core Global Multi-Sector Bond ETF  
AGFiQ Enhanced Core International Equity ETF (previously, QuantShares Enhanced Core International Equity ETF)  
AGFiQ Enhanced Core US Equity ETF (previously, QuantShares Enhanced Core US Equity ETF)  
AGFiQ Enhanced Global ESG Factors ETF  
AGFiQ Enhanced Global Infrastructure ETF  
AGFiQ Global Equity Rotation ETF (previously, QuantShares Global Equity Rotation ETF)  
AGFiQ MultiAsset Allocation ETF (previously, QuantShares MultiAsset Allocation ETF)  
AGFiQ MultiAsset Income Allocation ETF (previously, QuantShares MultiAsset Income Allocation ETF)  
Principal Regulator – Ontario

**Type and Date:**

Final Long Form Prospectus dated January 31, 2019  
NP 11-202 Receipt dated February 1, 2019

**Offering Price and Description:**

units @ net asset value

**Underwriter(s) or Distributor(s):**

N/A

**Promoter(s):**

N/A

**Project #2857713**

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**Issuer Name:**

Barometer Disciplined Leadership Balanced Fund  
Barometer Disciplined Leadership Equity Fund  
Barometer Disciplined Leadership Tactical Income Growth Fund  
Principal Regulator – Ontario

**Type and Date:**

Final Simplified Prospectus dated January 25, 2019  
NP 11-202 Receipt dated January 31, 2019

**Offering Price and Description:**

Class A, F and I units @ net asset value

**Underwriter(s) or Distributor(s):**

N/A

**Promoter(s):**

N/A

**Project #2858083**

**Issuer Name:**

RBC Private Canadian Growth and Income Equity Pool  
Principal Regulator – Ontario

**Type and Date:**

Amendment #4 to Final Simplified Prospectus dated January 31, 2019

NP 11-202 Receipt dated February 4, 2019

**Offering Price and Description:**

Series F and Series O units

**Underwriter(s) or Distributor(s):**

RBC Global Asset Management Inc. (other than Series A)  
Royal Mutual Funds Inc. (Series A)  
Royal Mutual Funds Inc./RBC Direct Investing Inc.  
The Royal Trust Company  
RBC Dominion Securities Inc.  
Phillips, Hager & North Investment Funds Ltd.

**Promoter(s):**

RBC Global Asset Management Inc. (other than Series A)

**Project #2774740**

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**Issuer Name:**

BMO Balanced Yield Plus ETF Portfolio  
BMO Fixed Income Yield Plus ETF Portfolio  
BMO Laddered Corporate Bond Fund  
Principal Regulator – Ontario

**Type and Date:**

Amendment #3 to Final Simplified Prospectus dated January 28, 2019

NP 11-202 Receipt dated February 1, 2019

**Offering Price and Description:**

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**Underwriter(s) or Distributor(s):**

BMO Investments Inc.

**Promoter(s):**

BMO Investments Inc.

**Project #2744768**

**Issuer Name:**

CMP 2019 Resource Limited Partnership  
Principal Regulator – Ontario

**Type and Date:**

Final Long Form Prospectus dated January 29, 2019  
NP 11-202 Receipt dated January 31, 2019

**Offering Price and Description:**

Limited partnership units @ net asset value

**Underwriter(s) or Distributor(s):**

Scotia Capital Inc.  
CIBC World Markets Inc.  
National Bank Financial Inc.  
RBC Dominion Securities Inc.  
BMO Nesbitt Burns Inc.  
TD Securities Inc.  
Industrial Alliance Securities Inc.  
Echelon Wealth Partners Inc.  
Canaccord Genuity Corp.  
Desjardins Securities Inc.  
Raymond James Ltd.

**Promoter(s):**

Goodman & Company, Investment Counsel Inc.  
**Project #2857342**

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**Issuer Name:**

EHP Guardian Alternative Fund  
EHP Advantage Alternative Fund  
EHP Guardian International Alternative Fund  
EHP Advantage International Alternative Fund  
EHP Select Alternative Fund  
EHP Global Arbitrage Alternative Fund  
Principal Regulator – Ontario

**Type and Date:**

Amended and Restated to Final Simplified Prospectus  
dated January 1, 2019  
NP 11-202 Receipt dated February 1, 2019

**Offering Price and Description:**

–

**Underwriter(s) or Distributor(s):**

N/A

**Promoter(s):**

EdgeHill Partners  
**Project #2786290**

**Issuer Name:**

Empire Life Dividend Growth Mutual Fund  
Empire Life Emblem Aggressive Growth Portfolio  
Empire Life Emblem Balanced Portfolio  
Empire Life Emblem Conservative Portfolio  
Empire Life Emblem Diversified Income Portfolio  
Empire Life Emblem Growth Portfolio  
Empire Life Emblem Moderate Growth Portfolio  
Empire Life Monthly Income Mutual Fund  
Principal Regulator – Ontario

**Type and Date:**

Final Simplified Prospectus dated January 29, 2019  
NP 11-202 Receipt dated February 4, 2019

**Offering Price and Description:**

–

**Underwriter(s) or Distributor(s):**

N/A

**Promoter(s):**

N/A

**Project #2857840**

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**Issuer Name:**

Franklin FTSE Canada All Cap Index ETF  
Franklin FTSE Europe ex U.K. Index ETF  
Franklin FTSE Japan Index ETF  
Franklin FTSE U.S. Index ETF  
Principal Regulator – Ontario

**Type and Date:**

Final Long Form Prospectus dated February 1, 2019  
NP 11-202 Receipt dated February 4, 2019

**Offering Price and Description:**

Units @ net asset value

**Underwriter(s) or Distributor(s):**

N/A

**Promoter(s):**

Franklin Templeton Investments Corp  
**Project #2854744**

---

**Issuer Name:**

Mackenzie Credit Absolute Return Fund  
Mackenzie Global Long/Short Equity Fund  
Mackenzie Global Macro Fund  
Principal Regulator – Ontario

**Type and Date:**

Final Simplified Prospectus dated January 31, 2019  
NP 11-202 Receipt dated February 1, 2019

**Offering Price and Description:**

Series A, F, FB, O, PW, PWFB and PWX units

**Underwriter(s) or Distributor(s):**

N/A

**Promoter(s):**

Mackenzie Financial Corporation  
**Project #2853423**

**Issuer Name:**

Ninepoint 2019 Flow-Through Limited Partnership  
Principal Regulator – Ontario

**Type and Date:**

Final Long Form Prospectus dated January 29, 2019  
NP 11-202 Receipt dated January 30, 2019

**Offering Price and Description:**

Maximum: \$50,000,000 – 2,000,000 Limited Partnership  
Units

Minimum: \$5,000,000 – 200,000 – Limited Partnership  
Units

Price per Unit: \$25

**Underwriter(s) or Distributor(s):**

RBC Dominion Securities Inc.  
CIBC World Markets Inc.  
TD Securities Inc.  
National Bank Financial Inc.  
BMO Nesbitt Burns Inc.  
Scotia Capital Inc.  
GMP Securities L.P.  
Industrial Alliance Securities Inc.  
Manulife Securities Incorporated  
Raymond James Ltd.  
Canaccord Genuity Corp.  
Desjardins Securities Inc.  
Echelon Wealth Partners Inc.

**Promoter(s):**

Ninepoint 2019 Corporation

**Project #2858073**

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## NON-INVESTMENT FUNDS

**Issuer Name:**

Buckhaven Capital Corp.  
Principal Regulator – British Columbia

**Type and Date:**

Preliminary CPC Prospectus dated January 30, 2019  
NP 11-202 Preliminary Receipt dated January 31, 2019

**Offering Price and Description:**

OFFERING: \$322,500.00 (2,150,000 COMMON SHARES)

Price: \$0.15 per Common Share

**Underwriter(s) or Distributor(s):**

Haywood Securities Inc.

**Promoter(s):**

Murray Sinclair & Robert Buchan

**Project #2870019**

**Issuer Name:**

Chemistree Technology Inc. (Formerly Whattozee Networks Inc.)

Principal Regulator – British Columbia

**Type and Date:**

Preliminary Short Form Prospectus dated February 1, 2019  
Received on February 4, 2019

**Offering Price and Description:**

Up to \$[\*] 10% Unsecured Convertible Debenture Units

Price \$1,000.00 per Convertible Debenture Unit

**Underwriter(s) or Distributor(s):**

–

**Promoter(s):**

–

**Project #2871072**

**Issuer Name:**

Euro Sun Mining Inc. (formerly Carpathian Gold Inc.)  
Principal Regulator – Ontario

**Type and Date:**

Preliminary Short Form Prospectus dated January 29, 2019  
NP 11-202 Preliminary Receipt dated January 29, 2019

**Offering Price and Description:**

Up To \$10,000,000.00

Up To \* Units

PRICE: \$\* PER UNIT

**Underwriter(s) or Distributor(s):**

BMO Nesbitt Burns Inc.  
Canaccord Genuity Corp  
GMP Securities L.P.  
Haywood Securities Inc..

**Promoter(s):**

–

**Project #2868578**

**Issuer Name:**

Euro Sun Mining Inc. (formerly Carpathian Gold Inc.)  
Principal Regulator – Ontario

**Type and Date:**

Amendment #1 dated January 29, 2019 to Preliminary Short Form Prospectus dated January 29, 2019  
NP 11-202 Preliminary Receipt dated January 30, 2019

**Offering Price and Description:**

Up To \$10,000,000.00

Up To 25,000,000 Units

PRICE: \$0.40 PER UNIT

**Underwriter(s) or Distributor(s):**

BMO Nesbitt Burns Inc.  
Canaccord Genuity Corp  
GMP Securities L.P.  
Haywood Securities Inc..

**Promoter(s):**

–

**Project #2868578**

**Issuer Name:**

The Alkaline Water Company Inc.  
Principal Regulator – British Columbia

**Type and Date:**

Preliminary Prospectus – MJDS dated January 30, 2019  
NP 11-202 Preliminary Receipt dated January 31, 2019

**Offering Price and Description:**

US\$50,000,000.00

Common Stock

Preferred Stock

Debt Securities

Warrants

Subscription Receipts

Units

**Underwriter(s) or Distributor(s):**

–

**Promoter(s):**

–

**Project #2870082**

**Issuer Name:**

Alphanco Venture Corp.  
Principal Regulator – British Columbia

**Type and Date:**

Final CPC Prospectus dated January 25, 2019  
NP 11-202 Receipt dated January 30, 2019

**Offering Price and Description:**

Offering: \$400,000.00 – 4,000,000 Common Shares

Price: \$0.10 per Common Share

**Underwriter(s) or Distributor(s):**

Canaccord Genuity Corp.

**Promoter(s):**

Joanne Yan

**Project #2859020**

**Issuer Name:**

Bond Resources Inc.  
Principal Regulator – British Columbia

**Type and Date:**

Final Long Form Prospectus dated February 1, 2019  
NP 11-202 Receipt dated February 1, 2019

**Offering Price and Description:**

Offering of \$350,000.00  
1,750,000 Shares at \$0.20 per Share

**Underwriter(s) or Distributor(s):**

Mackie Research Capital Corporation

**Promoter(s):**

Robert Eadie  
Gary Arca

**Project #2839457**

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**Issuer Name:**

Hampton Bay Capital Inc.  
Principal Regulator – Ontario

**Type and Date:**

Final CPC Prospectus dated January 29, 2019  
NP 11-202 Receipt dated January 31, 2019

**Offering Price and Description:**

Minimum Offering: \$300,000.00 (3,000,000 Common Shares)

Maximum Offering: \$800,000.00 (8,000,000 Common Shares)

Price: \$0.10 per Offered Share

**Underwriter(s) or Distributor(s):**

Echelon Wealth Partners Inc.

**Promoter(s):**

Jeremy Edelman

**Project #2841297**

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**Issuer Name:**

Heritage Cannabis Holdings Corp. (formerly Umbral Energy Corp.)

Principal Regulator – British Columbia

**Type and Date:**

Final Short Form Prospectus dated January 30, 2019  
NP 11-202 Receipt dated February 1, 2019

**Offering Price and Description:**

\$7,500,000.00 – 30,000,000 Units Issuable upon Exercise or Deemed Exercise

of 30,000,000 Special Warrants

**Underwriter(s) or Distributor(s):**

Cormack Securities Inc.

Canaccord Genuity Corp.

**Promoter(s):**

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**Project #2855242**

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## Chapter 12

# Registrations

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### 12.1.1 Registrants

Type	Company	Category of Registration	Effective Date
New Registration	Durham Asset Management Inc.	Investment Fund Manager, Portfolio Manager and Exempt Market Dealer	January 29, 2019
New Registration	Clearpool Execution Services (Canada) Limited	Investment Dealer	February 1, 2019

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## Chapter 13

# SROs, Marketplaces, Clearing Agencies and Trade Repositories

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### 13.2 Marketplaces

#### 13.2.1 TSX Inc. – Dark Trading Enhancements – Notice of Approval

##### TSX INC.

##### NOTICE OF APPROVAL

##### DARK TRADING ENHANCEMENTS

In accordance with the *Process for the Review and Approval of the Information Contained in Form 21-101F1 and the Exhibits Thereto*, TSX Inc. (TSX) has adopted, and the Ontario Securities Commission has approved, amendments to the TSX Rule Book to reflect enhancements to the Market on Close facility operated by TSX (the Amendments).

##### Summary of the Amendments

Rule 1-101 of the TSX Rule Book will be amended to add a definition for the new “MOC Closing Offset Order” order type, and the definition of “MOC Order” will be amended to include the MOC Closing Offset Order.

Rule 4-902 will be amended to:

- (i) provide when MOC Closing Offset Orders may be entered, cancelled and modified;
- (ii) provide for the entering of the MOC Closing Offset Orders in the MOC Book on either side of the MOC Imbalance;
- (iii) provide for the prioritization of limit orders and amended to include dark limit orders and MOC Closing Offset Orders; and
- (iv) correct typographical errors.

The Amendments were published for comment on November 1, 2018 and no comments were received. A copy of the Amendments can be found at [www.osc.gov.on.ca](http://www.osc.gov.on.ca).

The Amendments will be effective in the second quarter of 2019, following a notice by TSX.

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## Chapter 25

# Other Information

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### 25.1 Revocations

#### 25.1.1 Husky Energy Inc.

##### Headnote

National Policy 11-203 Process for Exemptive Relief Applications in Multiple Jurisdictions – Revocation of order exempting issuer from requirements in NI 51-101 that qualified reserves evaluator or auditor be independent from the issuer, that an independent qualified reserves evaluator or auditor execute the required annual filing – issuer intends to engage independent qualified oil and gas reserves evaluators or auditors and to require such independent qualified reserves evaluator or auditor to complete and execute Form 51-101F2 in accordance with NI 51-101.

##### Applicable Legislative Provisions

National Instrument 51-101 Standards of Disclosure for Oil and Gas Activities.  
Securities Act, R.S.O. 1990, c. S.5, as am., s.144.

**Citation:** Re Husky Energy Inc., 2019 ABASC 17

January 28, 2019

IN THE MATTER OF  
THE SECURITIES LEGISLATION OF  
ALBERTA AND ONTARIO  
(the Jurisdictions)

AND

IN THE MATTER OF  
THE PROCESS FOR EXEMPTIVE RELIEF APPLICATIONS  
IN MULTIPLE JURISDICTIONS

AND

IN THE MATTER OF  
HUSKY ENERGY INC.  
(the Filer)

REVOCATION

##### Background

The securities regulatory authority or regulator in each of the Jurisdictions (the **Decision Maker**) has received an application from the Filer for a decision under the securities legislation of the Jurisdictions (the **Legislation**) revoking the decision of the Decision Makers dated December 17, 2010 (cited as *Re Husky Energy Inc.*, 2010 ABASC 586) which exempted the Filer from the requirements contained in the Legislation:

- (a) that the qualified reserves evaluators or auditors appointed under section 3.2 of National Instrument 51-101 *Standards of Disclosure for Oil and Gas Activities* (**NI 51-101**) be independent of the Filer and that each of the qualified reserves evaluators or auditors who execute the report required under item 2 of section 2.1 of NI 51-101 (the **Evaluator Report**) be independent of the Filer (collectively, the **Independent Evaluator Requirement**); and
- (b) that the Evaluator Report be in accordance with Form 51-101F2 *Report on [Reserves Data][Contingent Resources Data][and][Prospective Resources Data]* by Independent Qualified Reserves Evaluator or Auditor (**Form 51-101F2**) and that the report required under item 3 of section 2.1 of NI 51-101 (the **Management Report**) be in accordance with Form 51-101F3 *Report of Management and Directors on Oil and Gas*

*Disclosure (Form 51-101F3 and, together with Form 51-101F2, the **Related Form Requirements**), to the extent necessary for such reports to reflect changes which are consequential to the exemption from the Independent Evaluator Requirement*

(the **NI 51-101 Decision**).

Under the Process for Exemptive Relief Applications in Multiple Jurisdictions (for a dual passport application):

- (a) the Alberta Securities Commission is the principal regulator for this application;
- (b) the Filer has provided notice that section 4.7(1) of Multilateral Instrument 11-102 Passport System (MI 11-102) is intended to be relied upon in British Columbia, Saskatchewan, Manitoba, Québec, New Brunswick, Nova Scotia, Newfoundland and Labrador, Prince Edward Island, Nunavut, Yukon and Northwest Territories; and
- (c) the decision is the decision of the principal regulator and evidences the decision of the securities regulatory authority or regulator in Ontario.

### Interpretation

Terms defined in National Instrument 14-101 *Definitions* or MI 11-102 have the same meanings if used in this decision, unless otherwise defined.

### Representations

This decision is based on the following facts represented by the Filer:

1. The Filer is a corporation existing under the *Business Corporations Act* (Alberta).
2. The Filer's head office is located in Calgary, Alberta.
3. The Filer is a reporting issuer in each of the provinces of Canada.
4. The Filer is not in default of securities legislation in any jurisdiction of Canada.
5. The authorized capital of the Filer consists of an unlimited number of common shares (the **Husky Shares**) and an unlimited number of preferred shares, issuable in series. As at November 30, 2018 there were 1,005,121,738 Husky Shares issued and outstanding.
6. The Husky Shares are listed for trading on the Toronto Stock Exchange (the **TSX**) under the symbol "HSE".
7. In connection with amendments to NI 51-101 that became effective on December 30, 2010, Husky applied for and received the NI 51-101 Decision.
8. Husky intends, commencing for the year ending December 31, 2018, to engage an independent qualified oil and gas reserves evaluator or auditor in respect of Husky's reserves reporting under NI 51-101 and to require such independent qualified reserves evaluator or auditor to complete and execute Form 51-101F2 in accordance with NI 51-101, and to complete and execute Form 51-101F3 in accordance with NI 51-101.

### Decision

Each of the Decision Makers is satisfied that the decision meets the test set out in the Legislation for the Decision Maker to make the decision.

The decision of the Decision Makers under the Legislation is that the NI 51-101 Decision is revoked.

For the Commission:

"Tom Cotter"  
Vice-Chair

"Kari Horn"  
Vice-Chair

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