



May 15, 2008

Mr. John Stevenson, Secretary
Ontario Securities Commission
And
The Honorable Iris Evans
Minister of Finance Province of Alberta

RE: Proposed NI31-103

We attended the information session in Calgary that dealt with the exempt market dealers section of the above and found it to be somewhat perplexing. The proposed changes appear to start at the end goal and work backwards from there.

For example, there is no educational course that is offered to this market, but your mission is for everyone to take a course that has no instructions relevant to the exempt industry. This is a quick fix to reach an end goal. Before all the changes are set out why doesn't the commission start at the beginning with an educational course relevant to the real estate investing market: a course on creating wealth, leverage and an overview of tax issues. This course could incorporate the basics taken from the current securities course, but focus on what really matters in our industry. Start at the beginning and move forward. Take your time to setup the appropriate steps to meet your end objectives. Again we believe you are starting at the end and moving backwards.

As was mentioned in the information session, the industry is changing and billions of dollars are being invested in the exempt market place. This tells you that private investors are interested in new ways of creating wealth. We do not disagree that the Securities Commission wants to make changes to regulate, but we do disagree with what changes that are being presented. It is very clear that the changes being promoted by the commission are simply trying to fit the exempt market into an existing structure with rules and regulations that already exist for other securities promoters. As mentioned, this is an exempt, or if worded differently, a different market, therefore, in our opinion you cannot fit this market into a standard classification and follow the same guidelines. Again, start at the beginning and work step-by-step to make it relevant and appropriate for the industry.

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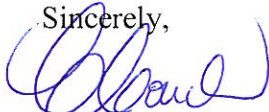
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As far as investor interactions and all the proposed risk, KYC forms, etc. It is our position that the investor is already very well protected with the offering memorandum that is prepared. This disclosure tells all and warns everyone of the risk. A Risk Acknowledgement form is not just signed once but two or three times. It is also important to note that the fact that investors are investing billions in this industry shows us that they are ready for change in their investment needs. They have chosen to invest with private corporations for a reason. We have spoken to many investors about why they choose to invest in our product; the number one reason is diversification leading to wealth creation. The investor is not content being offered and policed by the commission on what they can and cannot invest in. These investors want change and have the right to make their own investment decisions.

Further to that, the KYC is a form that has personal and confidential information. Investors are not receiving investment advice from our Sales Consultants. They do not pretend to be Financial Advisors. All they are conveying is the details of the project and reviewing the paperwork including the Risk Acknowledgement forms. The changes proposed again are a quick fix to a problem that does not exist. We urge you again to start at the beginning and work step by step to the end.

In our opinion the exempt market does not need to change, but guidelines need to be clearly outlined and available.

Sincerely,


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