

Phoebe Chan
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Feb 6, 2014

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John Stevenson, Secretary
Ontario Securities Commission
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and

Me Anne-Marie Beaudoin
Directrice du secrétariat
Autorité des marchés financiers
800, square Victoria, 22e étage
C.P. 246, tour de la Bourse
Montréal, Québec H4Z 1G3

**Re: Response to CSA Notice and Request for Comment: Proposed Amendments on NI 31-103
Registration Requirements, Exemptions and Ongoing Registrant Obligations Published December
5, 2013**

Dear Sir and Madam:

I am writing this to comment on the referenced proposed amendments to NI 31-103. As a Dealing Representative in the Exempt market, I feel that one more proposed amendment be made, the ability for a Dealing Representative to receive compensation to their corporation.

NI 31-103 came into being September 28, 2009. A little over a year later, on December 20, 2010 a consultation paper was published named "Consultation on Possible Options for the Incorporation of Individual Representatives of Registered Dealers and Advisors in Canada." This comment period was open until February 25, 2011. A "Summary of Consultation Responses" was then published June 2011 where 63 formal stakeholder wrote in and 59 of them were in favor of adopting a statutory incorporation model for Dealing Representatives. The next steps were for the "working group plans to report back to the Ministers responsible for securities regulation across Canada early this summer on results of the consultation together with recommendations for proceeding." I support these findings and recommends that NI 31-103 be amended to accommodate for incorporation of individual representatives (Dealing Representatives) of Registered Dealers and Advisors in Canada.

The benefits of Incorporation of Dealing Representatives are numerous, including more effective business, taxation and legacy planning. In particular, allowing incorporation would:

- Encourage Dealing Representatives to serve investors better through the long term business perspective that we believe incorporation fosters;
- Assist in harmonizing the application of NI 31-103 as some provinces allow incorporation and others do not;
- Reduce the conflicts and regulatory confusion created around this issue when Dealing Representatives are registered in multiple jurisdictions; and
- Harmonize Dealing Representatives with other professional financial services categories such as MFDA and Insurance that already allow compensation to an Advisors Corporation (IIROC is the only category that currently does not allow it).

If you would like further elaboration on my comments, please feel free to contact me at pchan@sloanecap.com.

Regards,

Phoebe Chan

CC:

Cora Pettipas cora@nemaonline.ca

Date: Feb 07 2014

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**Re: Response to CSA Notice and Request for Comment: Proposed Amendments on NI 31-103
Registration Requirements, Exemptions and Ongoing Registrant Obligations Published December 5,
2013**

Dear Sir and Madam:

Although I am very new to this industry, I am writing this to comment on the referenced proposed amendments to NI 31-103. As a Dealing Representative in the Exempt market, I would personally like to see the following proposed amendment be made, the ability for a Dealing Representative to receive compensation to their corporation.

As I understand, NI 31-103 came into being September 28, 2009. A little over a year later, on December 20, 2010 a consultation paper was published named "Consultation on Possible Options for the Incorporation of Individual Representatives of Registered Dealers and Advisors in Canada." This comment period was open until February 25, 2011. A "Summary of Consultation Responses" was then published June 2011 where 63 formal stakeholder wrote in and 59 of them were in favor of adopting a statutory incorporation model for Dealing Representatives. In my opinion, this ration in itself speaks to the anticipated value to Dealing Representatives if this proposed amendment is made. The next steps were for the "working group plans to report back to the Ministers responsible for securities regulation across Canada early this summer on results of the consultation together with recommendations for proceeding." I personally support these findings and recommend that NI 31-103 be amended to accommodate for incorporation of individual representatives like myself, (Dealing Representatives) of Registered Dealers and Advisors in Canada.

The benefits of Incorporation of Dealing Representatives are numerous, including more effective business, taxation and legacy planning. In particular, allowing incorporation would:

- Encourage Dealing Representatives to serve investors better through the long term business perspective that we believe incorporation fosters;
- Assist in harmonizing the application of NI 31-103 as some provinces allow incorporation and others do not;
- Reduce the conflicts and regulatory confusion created around this issue when Dealing Representatives are registered in multiple jurisdictions; and

- Harmonize Dealing Representatives with other professional financial services categories such as MFDA and Insurance that already allow compensation to an Advisors Corporation (IIROC is the only category that currently does not allow it).

If you would like further elaboration on my comments, please feel free to contact me at bcrocker@sloanecap.com or 519.476.3645 anytime.

Regards,

A square box containing a handwritten signature in blue ink, which appears to be the initials 'BC'.

Dealing Representative, Ben Crocker

CC:

Cora Pettipas cora@nemaonline.ca

February 10, 2014

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John Stevenson, Secretary
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The benefits of Incorporation of Dealing Representatives are numerous, including more effective business, taxation and legacy planning. In particular, allowing incorporation would:

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- Harmonize Dealing Representatives with other professional financial services categories such as MFDA and Insurance that already allow compensation to an Advisors Corporation (IIROC is the only category that currently does not allow it).

If you would like further elaboration on my comments, please feel free to contact me at smalboeuf@sloanecap.com 250-575-2235

Regards,

Stephane Malboeuf
Kelowna, BC

CC:
Cora Pettipas cora@nemaonline.ca

jstevenson@osc.gov.on.ca

John Stevenson, Secretary
Ontario Securities Commission
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Registration Requirements, Exemptions and Ongoing Registrant Obligations Published December
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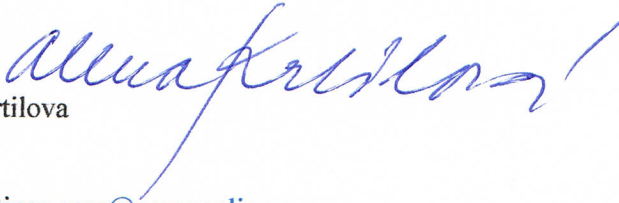
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- Harmonize Dealing Representatives with other professional financial services categories such as MFDA and Insurance that already allow compensation to an Advisors Corporation (IIROC is the only category that currently does not allow it).

If you would like further elaboration on my comments, please feel free to contact me at alena.krtilova@gmail.com, and 778-476-4650

Regards,

Alena Krtilova



February 18, 2014

CC:

Cora Pettipas cora@nemaonline.ca

March 6, 2014

jstevenson@osc.gov.on.ca

consultation-en-cours@lautorite.gc.ca

John Stevenson, Secretary
Ontario Securities Commission
20 Queen Street West
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Re: Response to CSA Notice and Request for Comment: Proposed Amendments on NI 31-103 Registration Requirements, Exemptions and Ongoing Registrant Obligations Published December 5, 2013

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If you would like further elaboration on my comments, please feel free to contact me at mvelybbert@gmail.com or 1-604-559-8420.

Regards,

Marilyn Lybbert

CC:

Cora Pettipas cora@nemaonline.ca

March 3, 2014

John Stevenson, Secretary
Ontario Securities Commission
20 Queen Street West
Suite 1900, Box 55
Toronto, Ontario M5H 3S8

and

Me Anne-Marie Beaudoin
Directrice du secrétariat
Autorité des marchés financiers
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Re: [Response to CSA Notice and Request for Comment: Proposed Amendments on NI 31-103 Registration Requirements, Exemptions and Ongoing Registrant Obligations Published December 5, 2013](#)

Dear Sir and Madam:

I am writing this to comment on the referenced proposed amendments to NI 31-103. As a Dealing Representative in the Exempt market, registered in BC, Alberta and Ontario, I feel that one more proposed amendment be made, the ability for a Dealing Representative to receive compensation to their corporation.

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If you would like further elaboration on my comments, please feel free to contact me by email or phone.
Regards,

Ted Snider

Ted (Theodore) Snider, *Private Market Specialist*

SLOANE CAPITAL CORP. 104-970 Meares Street

Victoria, BC, V8V 3J4, Cell: 250 208-7117

Work: 250 412-3021, Fax: 250 388-6748

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If you would like further elaboration on my comments, please feel free to contact me.

Regards,



Yvonne Becker

Business Development Manager and
Exempt Market Dealing Representative

C: 250-589-7714

B: 250-385-7714

Sloane Capital Corp.



This message and any attachment hereto are intended solely for the use of the designated recipient(s) and their appointed delegates and may contain confidential information. Any unauthorized use, disclosure, copying, or distribution of its contents is strictly prohibited. If you believe that you are not the intended recipient of this message, please destroy it and advise the sender immediately by phone, email, or fax.

MAR. 5, 2014

John Stevenson, Secretary
Ontario Securities Commission
20 Queen Street West
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Me Anne-Marie Beaudoin
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If you would like further elaboration on my comments, please feel free to contact me at yyang@sloanecap.com.

Regards,

Yolanda Yang (DR)

March 12th, 2014

jstevenson@osc.gov.on.ca

consultation-en-cours@lautorite.gc.ca

John Stevenson, Secretary
Ontario Securities Commission
20 Queen Street West
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If you would like further elaboration on my comments, please feel free. Contact information listed below.

Regards,



Colin Partridge

Insurance and Exempt Market Representative

M: [250.826.1893](tel:250.826.1893) | F: [778.755.5755](tel:778.755.5755)

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SLOANE CAPITAL CORP.