

Comments from Don Mosher, the President of the Venture Capital Market Association.

----- Forwarded message -----

From: "Don Mosher" <don@venturefunding.biz>

I support the changes proposed to the Rights Offering Regime as discussed at the BCSC meeting on February 3, 2015.

Reducing costs and time for listed companies will allow more money to be spent on research, development, exploration regardless of sector. These changes will not be the solution to the current situation facing the Venture Markets.

IIROC has been very successful at eliminating the transaction business by implementing the CRM, now being followed up by the CRM2. Since November 27, 2014, 8 more members of IIROC have resigned.

Vancouver was the home to over 40 independent firms with about 7 remaining. There is no viable means of reaching the retail investor in Canada with the demise of these firms. Too much liability combined with the costs have made it impossible for firms to prosper, their demise harbours the demise of the Venture Market as we know it.

“Protect the public” is the battle cry of the regulators, the CSA appears to have finally realized that there is a crisis, maybe the message should be passed onto IIROC. Every investment comes with associated risk, venture investments come with higher risk but also the potential for higher returns. The returns to the Canadian economy are the creation of jobs, companies and wealth. New listings on the TSX are predominantly ETF’s and proprietary products created by large institutions that protect the public through diversification by packaging corporate shares into a variety of baskets. If diversification reduces risk then the consolidation of the Canadian financial markets, ultimately ending up under the control of the “Big Six “ banks and a few other large institutions like Manulife is a threat to health of the Canadian Public. What is the CSA and IIROC doing to protect us?

Equities age, merge and many cases ultimately die. The Venture Market acts as an imperfect incubator producing failures and successes but all producing the jobs that train future geologists, engineers, accountants, lawyers, etc. Can a resource based country of 35 million people prosper if risk capital cannot be raised? Why would a foreign institution or investor want to invest into the Canadian equities that our own citizens are restricted from buying?

Our Venture Market is unique to Canada and needs to be nurtured. Our economy is resource based, that in itself is very risky, held hostage by the cyclical nature of commodity prices. This 5 year bear market that the Venture Market is experiencing has been amplified by the contribution of each regulatory body overseeing the public markets. Just opening an account with a broker has become a major exercise in paper work, justified by concerns about money laundering, suitability, risk tolerance and transparency.

The Canadian Public that wants to speculate or gamble has been driven to the casinos and lotteries where you can just walk into an outlet and risk your money.