

## DETERMINATION DECISION 25-02

### Arts Club of Vancouver Theatre Society

#### Designated Filer: Peter Cathie White

February 5, 2025

**SUMMARY:** The designated filer for the Arts Club of Vancouver Theatre Society (the Arts Club) was found to have contravened sections 3(3) and 2.4 of the *Lobbyists Transparency Act* (LTA). The designated filer received an administrative penalty totalling \$600 for the contraventions.

**Statues considered:** *Lobbyists Transparency Act*, SBC 2001, c. 42.

**Authorities considered:** Investigation Report 17-01, Investigation Report 18-04, Determination Decision 23-03, and Determination Decision 23-04.

#### INTRODUCTION

[1] This report concerns an investigation under section 7.1 of the LTA. This section gives the Registrar of Lobbyists (the Registrar) the authority to conduct an investigation to determine compliance with the LTA and its regulations. If the Registrar or their delegate believes that the person under investigation has not complied with a provision of the LTA or its regulations, section 7.2 of the LTA requires the Registrar to give a person under investigation notice of the alleged contravention and the reasons for the Registrar's belief that the contravention has occurred. Prior to making a determination under section 7.2(2) of the LTA, the Registrar must, under section 7.2(1)(b), give the person under investigation a reasonable opportunity to be heard respecting the alleged contravention.

[2] The LTA recognizes two types of lobbyists: consultant lobbyists and in-house lobbyists. This report focuses on the activities of the Arts Club of Vancouver Theatre Society (the Arts Club), an organization that employs in-house lobbyists. An in-house lobbyist is a paid employee, officer or director of an organization who lobbies on behalf of the organization or affiliate.

[3] Section 3(3) of the LTA sets out the date by which the designated filer of an organization must file a Registration Return (a return) with the Registrar.

[4] Section 2.4 states that a lobbyist must not give or promise to give, directly or indirectly, any gift or other benefits to the public office holder the lobbyist is lobbying. This does not apply to a gift or other benefit noted at sections 2.4(2)(a) and (b).

[5] Under section 7(4)(d) of the LTA, the Registrar has delegated to me the authority to conduct this investigation, make a decision about compliance, and determine the appropriate penalties, if appropriate.

#### **ISSUES UNDER CONSIDERATION**

[6] The issues under consideration are:

- (a) Whether the designated filer contravened section 3(3) of the LTA by filing the Arts Club's initial Registration Return later than the legislated deadline;
- (b) Whether the designated filer contravened section 2.4 of the LTA when giving gifts to public office holders; and
- (c) If the designated filer did not comply with the requirements of the LTA, what, if any, administrative penalty is or penalties are appropriate in the circumstances.

#### **RELEVANT SECTIONS OF THE LTA**

[7] **"designated filer"** means

- (a) a consultant lobbyist, or
- (b) in the case of an organization that has an in-house lobbyist,
  - (i) the most senior officer of the organization who receives payment for performing the officer's functions, or
  - (ii) if there is no senior officer who receives payment, the most senior in-house lobbyist;

[8] **"public office holder"** means

- (a) a member of the Legislative Assembly and any person on the member's staff,
- (b) an officer or employee of the government of British Columbia,
- (c) a person who is appointed to any office or body by or with the approval of the Lieutenant Governor in Council, other than a person appointed on the recommendation of the Legislative Assembly,
- (d) a person who is appointed to any office or body by or with the approval of a minister of the government of British Columbia, and
- (e) an officer, director or employee of any government corporation as defined in the [\*Financial Administration Act\*](#).

but does not include a judge or a justice of the peace;

[9] **“senior public office holder”** means an individual who

- (a) is a member of the Executive Council,
- (b) is employed, other than as administrative support staff, in the office of a member of the Executive Council,
- (c) is a member of the Legislative Assembly,
- (d) is employed, other than as administrative support staff, in the office of a member of the Legislative Assembly,
- (e) is a parliamentary secretary,
- (f) occupies a senior executive position in a ministry, whether by the title of deputy minister, chief executive officer or another title,
- (g) occupies the position of associate deputy minister, assistant deputy minister or a position of comparable rank in a ministry, or
- (h) occupies a prescribed position in a Provincial entity.

[10] **Requirement to file Registration Return**

3(3) The designated filer of an organization must file with the registrar, within 10 days of the date the organization first has an in-house lobbyist, a Registration Return in the prescribed form and manner and containing the information required by section 4.

[11] **Gift-giving prohibition**

2.4 (1) A lobbyist must not give or promise to give, directly or indirectly, any gift or other benefits to the public office holder the lobbyist is lobbying.

(2) Subsection (1) does not apply to a gift or other benefits if the following apply:

- (a) the gift or benefit is given or promised to be given under the protocol or social obligation that normally accompany the duties or responsibilities of office of the public office holder;
- (b) the total value of gifts or benefits described in paragraph (a) given or promised to be given, directly or indirectly, by the lobbyist to the public office holder in a 12-month period is less than a prescribed amount.

[12] **Power to investigate**

7.1(1) If the registrar considers it necessary to establish whether there is or has been compliance by any person with this Act or the regulations, the registrar may investigate.

(2) The registrar may refuse to investigate or may cease an investigation with respect to any matter if the registrar believes that

(b) the matter is minor or trivial,

(c) dealing with the matter would serve no useful purpose because of the length of time that has elapsed since the matter arose,

[13] **Hearing and administrative penalty**

7.2 (1) If after an investigation under section 7.1 the registrar believes that a person under investigation has not complied with a provision of this Act or the regulations, the registrar must

(a) give notice to the person

(i) of the alleged contravention,

(ii) of the reasons why the registrar believes there has been a contravention, and

(iii) respecting how the person may exercise an opportunity to be heard under paragraph (b) of this subsection, and

(b) give the person a reasonable opportunity to be heard respecting the alleged contravention.

(2) If after giving a person under investigation a reasonable opportunity to be heard respecting an alleged contravention the registrar determines that the person has not complied with a prescribed provision of this Act or the regulations, the registrar

(a) must inform the person of the registrar's determination that there has been a contravention,

(b) may impose an administrative penalty of not more than \$25 000, and

(c) must give to the person notice

(i) if the registrar's determination that the person has not complied with a prescribed provision of this Act or the regulations and the reason for the decision,

(ii) if a penalty is imposed, of the amount, the reason for the amount and the date by which the penalty must be paid, and

(iii) respecting how the person may request reconsideration, under section 7.3, of the determination of non-compliance or the imposition or amount of the penalty.

**RELEVANT SECTION OF THE LOBBYISTS TRANSPARENCY REGULATION****[15] Prescribed amount for gift-giving prohibition**

6 For the purposes of section 2.4(2)(b) [*gift-giving prohibition*] of the Act, the prescribed amount is \$100.

**BACKGROUND**

[16] This Determination Decision considers two potential contraventions under the LTA.

***Section 3(3)***

[17] On March 9, 2023, the Arts Club submitted a Registration Return, number 9378-4910-1, for lobbying activity that took place on February 1, 2023. Based on this lobbying activity, the Arts Club was required to file a Registration Return under the LTA no later than February 11, 2023.

***Section 2.4***

[18] According to what it reported to the Lobbyists Registry, the Arts Club promised to give a gift valued at \$210 to a public office holder, the Minister of Tourism, Arts, Culture and Sport (the Minister) when they lobbied the Minister on February 1, 2023. The promised gift was two tickets to an Arts Club production. During a telephone conversation with Office of the Registrar of Lobbyists (ORL) staff, the Arts Club indicated that the tickets had been used by the Minister.

[19] In an email dated March 9, 2023, ORL staff advised the Arts Club to update the Lobbyists Registry to change the status of the gift from “promised” to “given,” since the tickets had been used by the public office holder (POH). ORL staff also informed the Arts Club that the LTA has a gift-giving prohibition. Specifically, that section 2.4 of the LTA prohibits a lobbyist from giving or promising a gift or benefit to a POH they are lobbying, with limited exceptions.

[20] In the same email correspondence of March 9, 2023, ORL staff requested that the Arts Club provide information about the gift, including an explanation of the circumstance and or purpose of the gift; the cost of the gift, including the total cost of food and beverages; details about the name and location of the venue where the event was held; the venue cost; and any other expenses that factored in to the value of the gift.

[21] The Arts Club responded on March 9, 2023, stating that the POH held a meeting with the designated filer and other performing arts organizations on February 1, 2023, to introduce themselves to the performing arts community; that the designated filer lobbied the POH for more funding; and that they offered the POH tickets to their locally produced production of “Forgiveness.” The Arts Club also stated that the tickets were house seats, routinely used “for

comps” with a value of \$105 each; there was no food or beverages provided. The performance took place at Stanley Industrial Alliance Stage in Vancouver on February 1, 2023, and there were no other associated costs.

## **INVESTIGATION**

[22] The ORL commenced an investigation under section 7.1 of the LTA to determine whether the designated filer had complied with ss. 3(3) and 2.4 of the LTA.

[23] On October 17, 2023, I provided the designated filer with formal notice under section 7.2(1)(a) of the LTA, outlining the basis for the allegation that the Arts Club had contravened ss. 3(3) and 2.4 of the LTA. I asked the designated filer to respond in writing to the alleged contraventions and to provide any information or documentation pertinent to the contraventions and any potential penalties.

[24] On November 21, 2023, the designated filer responded to the section 7.2(1)(a) notice. The designated filer provided the following explanations regarding the alleged contraventions.

### ***Registration Return, section 3(3) of the LTA***

[25] Regarding the late filing of the initial Registration Return, the designated filer stated that they do not define themselves as an in-house lobbyist, that as Executive Director, they are responsible for navigating the Arts Club through the difficult process of restoring their theatre company to its former status following the pandemic. They said that the past four years had been challenging due to the Covid-19 mandated closures and later audience size restrictions. They first registered with the Lobbyists Registry around January 25, 2023, prior to the February 1, 2023, meeting with the Minister, if their memory is correct. They also stated that they were advised by an Arts Club board member that they should register with the BC Lobbyists Registry since they had met with the Minister.

[26] The designated filer indicated that after their meeting with the Minister, they accessed the Lobbyists Registry, completed their first Monthly Return and exited the system, although they did not specify the date on which this occurred. They stated that they were not aware that their submission did not register in the system until they received a communication from ORL staff on March 9, 2023, notifying them of this fact. They indicated they were confused as to why their submission did not go through and requested assistance from ORL staff. The designated filer referred to and included portions of their email communications with ORL staff to confirm their request for assistance. The designated filer said they sought to rectify the matter on the same day and followed the instructions provided. They apologised for this error and indicated that the late filing was not intentional as they were under the impression that it had been submitted on time.

[27] The designated filer noted both their lack of experience with the ORL and the Lobbyists Registry portal as contributing to their confusion and apologized for the late submission. They stated that they hoped the ORL could see that they took steps to rectify the situation as soon as they knew they had not submitted the Registration Return correctly.

***Gift Giving prohibition, section 2.4 of the LTA***

[28] Regarding the gift, the designated filer stated that it was their understanding that the Minister seeing a production produced and developed by their theatre company fits within the gift giving prohibition exemptions. As the Minister had the arts in their portfolio, they said that seeing an arts and culture event with tickets given by the Arts Club “does fit under the protocol or social obligations that normally accompany the duties and responsibilities of office of the public office holder.” They also stated that the production the Minister saw was a new Arts Club commissioned work written by a BC playwright, based on a BC book.

[29] Additionally, the designated filer stated that attending a production to support the work of local BC artists is a responsibility of every Minister of Tourism, Arts, Culture and Sport as it is part of their portfolio. They do not believe that the Minister attending a production with house seats that are not normally part of their ticket sales inventory contravened section 2.4 of the LTA.

**DISCUSSION AND FINDINGS**

***Registration Return, section 3(3) of the LTA***

[30] As previously noted, the designated filer stated that they first registered with the Lobbyists Registry around January 25, 2023, prior to the February 1, 2023, meeting with the Minister. While I accept that the designated filer created an account in the Lobbyists Registry at that time, the designated filer did not complete a Registration Return. The information in the Registry shows that on March 9, 2023, the Arts Club submitted a Registration Return for lobbying activity that took place on February 1, 2023. Based on the reported lobbying activity, the Arts Club was required under the LTA to file a Registration Return no later than February 11, 2023. As such, the Registration Return was filed 26 days late.

[31] I find the Arts Club contravened section 3(3) of the LTA when they did not submit a Registration Return by the legislated deadline.

***Gift-giving prohibition, section 2.4 of the LTA***

[32] The designated filer’s submission states that as the Minister had the Arts in their portfolio, seeing one of their productions with tickets given by the Arts Club not only fits under the protocol or social obligations that normally accompany the duties and responsibilities of office of the POH, it’s also part of their responsibility as Minister. The designated filer’s

submission is silent on their position regarding the value of the gift given (two tickets valued at \$105 each, totalling \$210).

[33] Under the LTA, gifts<sup>1</sup> are considered to be anything of value given or promised for free or at a reduced rate, including tangible items such as art and jewelry. According to the *Lobbyist Gifts and Other Benefits* guidance document, tickets to cultural events meet the definition of a gift. As such, I find that the tickets given to the Minister by the Arts Club are a gift, by definition.

[34] Section 2.4 of the LTA creates a general prohibition of gift-giving by lobbyists to public office holders they are lobbying. There is an exception to the prohibition, and for it to apply, there are two conditions, both of which must be met. The first condition is that the gift must be given under the protocol or social obligations that normally accompany the duties or responsibilities of the office of the public office holder. The second condition is that the total combined valued of gifts must be less than \$100, as set out in s. 6 of the Lobbyists Transparency Regulation, within the 12-month period.

[35] In this case, the value of the gift is more than double the \$100 prescribed amount set out in the Lobbyists Transparency Regulation. Given this fact, the Arts Club has not met the second condition of section 2.4(2)(b) of the LTA, therefore the gift is prohibited.

[36] There is no need for me to consider whether the gift was given under the protocol or social obligation that normally accompany the duties or responsibilities of office of the POH, section 2.4(2)(a) of the LTA, because the gift given exceeds the prescribed limit.

[37] I find that the Arts Club has contravened section 2.4 of the LTA.

### **ADMINISTRATIVE PENALTY**

[38] Section 7.2(2) of the LTA provides that if, after giving a person under investigation a reasonable opportunity to be heard respecting an alleged contravention, the Registrar determines that the person has not complied with a prescribed provision of the Act or the regulation, the Registrar must inform the person of the Registrar's determination that there has been a contravention and may impose an administrative penalty of not more than \$25,000.

[39] Such person must be given notice of the contravention determination and, if a penalty is imposed, "the amount, the reason for the amount, and the date by which the penalty must be paid."

[40] Section 7.2 of the LTA confers discretion on the Registrar to impose administrative penalties. To provide a measure of structure in the exercise of that discretion, the ORL has

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<sup>1</sup> Lobbyist Gifts and Other Benefits, Revised: June 7, 2024.

<https://www.lobbyistsregistrar.bc.ca/handlers/DocumentHandler.ashx?DocumentID=345>



published a guidance document, *Registrar of Lobbyists: Guide to Investigations*<sup>2</sup> (guide to investigations), to advise members of the public and those engaged in lobbying about what will guide the ORL in exercising its duties under the LTA and the regulations. As the policy makes clear, its purpose is to structure discretion. It does not fetter discretion; it provides a consistent framework so lobbyists can have some certainty about the exercise of discretion. It is not law. I have considered that guidance in the exercise of my delegated discretion to determine a penalty based on the facts before me.

[41] The guide to investigations first sets out a general financial range for infractions, depending on whether they are a first, second or third infraction. Second, it provides a list of factors that will be considered in determining the amount of the administrative penalty. Finally, it includes a clear statement that the policy “does not fetter the ORL’s ability to conclude that no administrative penalty is appropriate in the circumstances, or to fashion a remedy on either side of the range set out in the general policy, in special circumstances.”

[42] In determining the appropriate administrative penalty within that range, I have taken the following factors into account:

- a. Previous enforcement actions for contraventions by this person;
- b. The gravity and magnitude of the contravention;
- c. Whether the contravention was deliberate;
- d. Whether the registrant derived any economic benefit from the contravention;
- e. Any efforts made by the registrant to report or correct the contravention;
- f. Whether a penalty is necessary for specific and general deterrence; and
- g. Any other factors that, in the opinion of the registrar or their delegate, are relevant to the administrative penalty.

[43] I have considered these factors, and the submissions made by the designated filer.

### ***Registration Returns, section 3(3) of the LTA***

[44] The failure to file a Registration Return on time undermines the transparency goal of the LTA and it prevents the public from knowing who is attempting to influence government at any point in time. The 10-day time limit is not optional or arbitrary and it is connected to the public’s right to know the information cited in section 4 of the LTA in a timely manner. In this case, the designated filer was required to file a Registration Return by February 11, 2023; however, this was done on March 9, 2023, 26 days later than required under the LTA.

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<sup>2</sup> Registrar of Lobbyists: Guide to Investigations, Revised: May 27, 2020.

<https://www.lobbyistsregistrar.bc.ca/handlers/DocumentHandler.ashx?DocumentID=345>

[45] The timeliness of reporting is a significant part of the reporting requirements of the LTA, and, in my view, while the 26-day delay is a relatively short period of time, it is enough of a delay in reporting to impact the public's right to know. For this reason, I reject the idea that this is a circumstance where no penalty is appropriate. A penalty is appropriate for the purpose of encouraging the designated filer to take their obligations under the LTA seriously and to remind all designated filers of their legal obligations in keeping registrations current and accurate.

[46] I acknowledge the Arts Club's position that they lacked familiarity with the ORL and that they found the filing process to be confusing. Even so, designated filers are responsible for meeting their obligations under the statute.

[47] The designated filer stated that their late filing was not intentional. As I do not have information before me to suggest that they took steps to avoid filing a Registration Return, I accept that their actions were not deliberate. I consider this to be a factor that weighs in favour of a lower penalty. Additionally, the steps they took to rectify the situation were done in a timely manner and I find this also weighs in favour of a penalty on the lower end of the range.

[48] I am not aware of any previous contraventions or warnings under the LTA or the LRA for the Arts Club. I consider this to be a factor that weighs in favour of a lower penalty. While filing a Registration Return 26 days late is not insignificant, I consider the magnitude of this contravention to be less serious than a lengthier delay, thus warranting a penalty on the lower end.

[49] I have no information that leads me to believe the Arts Club derived an economic benefit as a result of this contravention. I consider this to be a neutral factor.

[50] The suggested penalty found in the guide to investigations for registering late is between \$100 and \$5000 for the first instance of non-compliance. I have considered the following decisions to assist me in determining an appropriate penalty.

[51] In Investigation Report IR 17-01, a consultant lobbyist was fined \$500 under the LRA for filing of a Registration Return two months late. The designated filer had not received an ORL notification informing him the Registration Return was expiring. The designated filer depended on these notifications to maintain their registration. The investigator found the designated filer was aware of their obligations and should not have relied on notifications from the ORL to stay up to date.

[52] In IR 18-04, a consultant lobbyist was fined \$500 under the LRA for filing a Registration Return four months late. The investigator accepted that the failure to register on time was a result of a misunderstanding of the LRA and when the lobbyist was made aware of their obligations under the legislation, they registered immediately.

[53] In this case, the designated filer expressed knowing they needed to file a Registration Return and took steps to file the Registration Return after being notified that they needed to do so. The lateness of their filing is significantly less than the aforementioned circumstances and therefore, I find a lower penalty is in order.

[54] Considering all of the above factors, I find an appropriate penalty in this case is \$100 as it serves as a reminder of the importance of transparency for the public and to reinforce the designated filer's responsibility to adhere to the LTA's reporting requirements.

***Gift-giving prohibition section 2.4 of the LTA***

[55] The \$210 gift given to the POH was given in contravention of section 2.4 of the LTA. As previously stated, the designated filer believed that the gift was given under the protocol or social obligations that normally accompany the duties and responsibilities of the office of the public office holder, therefore, they believed there was no contravention.

[56] I considered and rejected the idea that this is a circumstance where no penalty is appropriate. A penalty in this circumstance is appropriate for the purpose of deterrence and encouraging all designated filers to be aware of the LTA's gift-giving prohibition and the specific exceptions to the statute. The ORL's guidance document on *Lobbyist Gifts and Other Benefits* explains the exceptions to this prohibition. The inclusion of the gift-giving prohibition in the LTA is intended to promote public trust in the decisions made by public office holders and to avoid the perception that decisions are influenced by gifts or benefits.

[57] The presence of a gift prohibition in the LTA informs us that the Legislature considered the potential for the undue influence gifts and other benefits could have on public office holders. Any gifts that do not meet the two-part limited exceptions test set out in section 2.4(2), fall squarely into the area of undue influence. Even if a gift does not result in influencing a public office holder, the perception that it may do so could undermine the integrity of the government and its public office holders. In this case, it is understandable that the public could think that providing free tickets to the person you are asking for funding could be a form of undue influence.

[58] In considering the gravity and magnitude of this contravention, it is my view that the higher the value of the gift, the greater the potential influence, regardless of the type of gift. In this case, the \$210 value of the gift is more than twice the prescribed amount, therefore, it raises the gravity and magnitude of this contravention to a moderate level. This supports a moderate penalty.

[59] I am not aware that this contravention resulted in any direct economic benefit for the Arts Club. In my view, this is a neutral factor.

[60] This is the designated filer's first contravention. I find this weighs in favour of a penalty on the lower end of the range.

[61] When considering whether this contravention was deliberate, I considered the designated filer's statement that attending a production to support the work of local BC artists is the responsibility of every Minister of Tourism, Arts, Culture and Sport. While the gift was deliberately given to showcase the organization's work, this does not demonstrate a deliberateness or intention to contravene the LTA, but rather a circumstance where the designated filer gave the gift without careful consideration and understanding of the LTA. Still, the responsibility rests with the lobbyist. If there is any doubt or questions arise, ORL staff are available to assist. All factors considered, this weighs in favour of a low to moderate penalty.

[62] The suggested penalty in the guide to investigations for giving or promising a prohibited gift is between \$1,000 and \$7,500. I have considered the following decisions in assessing an appropriate penalty.

[63] In Determination Decision (DD) 23-04, the designated filer gave a gift to a public office holder valued at \$59.35, lower than the prescribed \$100 limit over a 12-month period, but it did not meet the requirements set out in the first part of the test under section 2.4(a) of the LTA. The gift was found to be prohibited. In this case, an administrative penalty of \$1,000 was levied.

[64] In Determination Decision (DD) 23-03, an administrative penalty of \$1,200 was levied for a \$507 gift given which far exceeded the prescribed \$100 limit over a 12-month period. In that case, an additional penalty totalling \$1,000 was also levied for two gifts promised to two other public office holders (\$500 per gift promised).

[65] These decisions are similar to the present case in that there was no evidence of an economic benefit to the organizations, they were first time contraventions, and the contraventions were not deliberate. The gift given in DD 23-04 was prohibited because it did not meet the exclusion under section 2.4(2)(a) of the LTA and a penalty at the lowest end of the scale was levied. The value of that gift was much lower than in the present case. The gift given in DD 23-03 far exceeded the prescribed limit and is more than double the gift-given in this case. Taking all the circumstances set out above and these factors into consideration, I would consider a penalty of \$1,100, in the middle of the two referenced cases, to be reasonable.

[66] However, the designated filer asked for understanding in this matter. They indicated that any contraventions of the LTA were not intentional, that they rely on the goodwill of donors and patrons to survive, and that to commit some of its funds to paying fines would be detrimental to their not-for-profit charity.

[67] I have considered the organization's status as a non-profit. This fact distinguishes it from the organizations in DD 23-03 and DD 23-04 as it relies on donors, patrons and government

funding for its operations. I accept that any monetary penalty would be paid out of these funds and may impact their programs. With this in mind, I find that a reduced penalty of \$500 is reasonable to achieve the regulatory purpose of the LTA.

## **CONCLUSION**

1. Under section 7.2(2) of the LTA, I find that:
  - i. The designated filer contravened section 3(3) of the LTA when they failed to submit a Registration Return within 10 days of lobbying conducted by an in-house lobbyist. The notice of allegation has been substantiated.
  - ii. The designated filer contravened section 2.4 of the LTA by giving a prohibited gift. The notice of allegation has been substantiated.
  
2. I impose the following administrative penalties for the reasons set out above:
  - i. \$100 for contravening section 3(3) of the LTA; and
  - ii. \$500 for contravening section 2.4 of the LTA.

The total amount of administrative penalties is \$600.

3. The designated filer must pay the amount for the penalties no later than **March 19, 2025**.
  
4. If the designated filer requests reconsideration under section 7.3 of the LTA, they are to do so within 30 days of receiving this decision by providing a letter in writing directed to the Registrar of Lobbyists at the following address, setting out the grounds on which reconsideration is requested:

Office of the Registrar of Lobbyists for British Columbia  
PO Box 9038, Stn. Prov. Govt.  
Victoria, BC V8W 9A4  
Email: info@bcorl.ca

Date: February 5, 2025

ORIGINAL SIGNED BY

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Nanci Bond, Investigator and  
Delegate of the Registrar of Lobbyists