



Comprehensive/Fact Based Standards for Financial Advisors



Benefits Alliance (“BA”) is pleased to participate in this important consultation as we strongly believe that there is a growing need for higher standards, professionalism, and specialization within the financial services sector. We look forward to working with the Financial and Consumer Affairs Authority of Saskatchewan (“FCAA”) and would like to provide the following thoughts for your consideration.

About Us

BA is a national organization consisting of 28 independent member firms with more than 250 advisors, which collectively administer over 8,000 employee benefit plans, covering approximately 550,000 employees, with \$1.4 billion of group insurance premiums, as well as 1,500 group retirement plans that have over \$3.5 billion in plan assets.

We are highly selective in who qualifies to join BA, and prospective firms are peer nominated. Given the important role that Group Advisors play in the lives of all Canadians from coast-to-coast, to coast, only the best Group Advisors who are committed to the highest level of professionalism are invited into our membership.

BA is an industry advocate promoting professionalism and excellence in client service, and from a policy perspective, we want to ensure that all Canadians receive the best advice available.

Our mission is to represent the best interests of our clients and their employees. We are committed to continuing education and professional development to ensure our members provide the highest standards of service and excellence.

General Comments

The distinguishing feature that separates an FA and an FP is that the FP has committed to additional studies relevant to creating a comprehensive and integrated financial plan for their client. However, in most cases, those who have qualified to holdout as FPs do not create financial plans for their clients and operate more from the FA platform.

All advisors, inclusive of those who qualify for the use of the title FA or FP, in performing their KYC will be dealing with matters related to estate planning, tax planning, retirement planning, investment planning, financial management and insurance and risk management, elements identified as specific to FPs. In a holistic and comprehensive financial plan, a client can reasonably expect that each of these elements will be addressed. But this does not mean that all FPs will perform these tasks for each client. Nor does it mean that only FPs perform these tasks.

The reality is that all licensees, even those who do not qualify for the use of the title FA or FP are required to know their client and provide the services necessary to achieve the outcome the client has identified through their engagement with the licensee. Accordingly, a licensee who has not qualified to holdout as an FA or an FP will still address matters related to estate planning, tax planning, retirement planning, investment planning, financial management and insurance and risk management. Further, a licensee who has not qualified as an FA or an FP may also create a financial plan for their client.

Any discussion about raising the professional bar, higher levels of professionalism among licensees who are providing advice in the financial services sector, and enhanced consumer protection, must first appreciate the common base level entry requirements and role played by all licensees prior to developing a framework. An enhancement must move beyond the baseline established.



The *Fair Dealing Model* (“FDM”) published by the Ontario Securities Commission in 2004 identified that within financial services we have moved beyond a product-based environment and into an advice-driven business model. The FDM called for regulation to be advice-centric and not product-centric. Ontario Bill 157, *The Financial Advisors Act, 2014*, was the first attempt to professionalize FAs and FPs and recognized the advice-based nature of licensees and the drive to higher professional standards. Bill 157 was followed by the *Expert Committee to Review Regulation of Financial Advisors and Planners* (“Expert Committee”), which was established by the Government of Ontario in 2015. Ultimately, *The Financial Professionals Title Protection Act, 2019*, was introduced and implemented. In the interest of harmonization, the Ontario reform formula is now being considered in Saskatchewan by the FCAA with their legislative equivalent, *The Financial Planners and Financial Advisors Act* (“FPFAA”).

BA believes that both the Financial Services Regulatory Authority of Ontario (“FSRA”) and the FCAA are on the correct course but have made a fundamental error in the characterization of what licensees, FAs, and FPs do. The result is that the Baseline Competency Profile (“BCP”) for FAs is flawed. As the FA BCP premise is flawed, raising the professional bar, achieving higher levels of professionalism and consumer protection are not appropriately achieved. Below, we identify the areas of concern prior to responding to the questions posed by the FCAA in its consultation document.

With respect to the enhanced professionalism model proposed by the FCAA and FSRA we see an artificial professional division being created between the professional standards for an FA versus an FP. We also see the distinction between mere licensing and qualifying for the use of the FA title as being so similar, making the distinction between the two almost meaningless. Consumers correctly view the titles of FA and FP as equivalent, the exception being that those qualifying for the use of the title FP have undertaken additional and detailed studies related to the development and implementation of a comprehensive and integrated financial plan. BA believes that the current draft proposed regulations should be amended to properly represent consumer and advisor expectations and understanding of the comparable natures of FAs and FPs. Care must be taken on the part of the FCAA to avoid establishing an artificial professional division that will prove harmful to the consumer.

Current attempts to establish criteria to qualify as an FA fail to recognize the skills, training and education needed to operate as an FA as currently envisioned by consumers. This unfortunately may lead to an ex-post as opposed to an ex-ante approach being employed going forward. An ex-post approach to professionalism is counterintuitive. One would not expect a lawyer or accountant to qualify to use their professional title, and, ex-post, develop the requisite skill and expertise through continuing education. An ex-ante approach must be taken. This necessitates a re-examination of the views that have informed the FCAA and FSRA with respect to what an FA does and what should be expected of them above and beyond licensing requirements, and in comparison to FP title users.

What we are witnessing in relation to FAs is the bar being set so low that virtually anyone can qualify for the use of the title FA. The harm in doing so is two-fold:

1. It results in anyone using the title FA being equated with the lowest possibly qualifying FA. Meaning, individuals who have a high level of sophistication, and experience who hold out as FAs being equated with someone who is licensed and taken what many view as substandard courses that are not appropriately focused on core fundamentals.
2. The credentials required to qualify as an FP are far superior to those to qualify as an FA. The result, under the current formula in Ontario and potentially in Saskatchewan, is that we are witnessing an artificial professional division being established whereby the title FP becomes the “professional” standard while the FA title and designation is diminished.



Both the FCAA and FSRA need to keep foremost in their mind that consumers view the two titles, FA and FP, as essentially equivalent. The decision on the part of regulators to set the BCP so low for FAs serves no useful purpose and flies in the face of consumer understanding and protection.

BA would propose that the FCAA and The Government of Saskatchewan:

- Establish the standard sufficiently high for FAs, and set the bar much higher than licensing; and
- Establish the proper criteria (BCP for FAs) – adopting a comprehensive approach as is the case for BCP for FPs, to ensure better outcomes for consumers and meaningful consumer protection.

These are the cornerstones for any discussion for the FA BCP.

Consumer expectations related to FAs and FPs are driven by industry (product manufacturers, dealers, and advisors) who promote advice as professional and assisting consumers achieve financial health and well-being. To artificially establish any meaningful gulf between the work performed by an FA and an FP represents a serious risk to consumers. Governments and regulators will and should be held accountable for inflated client expectations when engaging an FA and the negative consequences that will flow from the product-focused approach to FA BCP that sets the bar too low. Arguably, if the FCAA follows the path established by the FSRA with respect to BCP for FAs the initial identified problem relating to consumer confusion and protection, and the raising of the professional bar will remain largely unchanged. However, through the codification of the status quo by governments and regulators, the existing confusion and risks to consumers become sanctioned by government and regulators. We do not believe this is the intent of the government or regulator. The FCAA has the opportunity to correct this error.

BA strongly encourages the FCAA to move forward with FA title protection predicated on a BCP comparable or equal to that of the FP, with the exception of expertise required in the development of a financial plan. The FCAA must ensure that an FA is knowledgeable and competent to address all aspects of a client's financial situation and needs.

Accordingly, to harmonize to the current threshold established in Ontario is undesirable and harmful to consumers, the industry, and experienced FAs. If the FCAA is going to effect change in terms of delineating the difference between an FA and someone who is only licensed, then it is incumbent on them to properly recognize the similarities between FAs and FPs and to establish a meaningful threshold whereby both titles are distinguishable from licensees. An ex-ante approach is mandatory in our view.

Primary Structural Concerns – A Closer Examination

The primary areas of concern with title protection legislation can be traced to two critical premises upon which the BCP for those using the title FA rests. The first is the use of a product-based approach to the identification of the role of FAs, and the second is the limited scope attributed to work done by an FA.

The Ontario Approach

While Ontario does not set out in its legislation or rules what an FA or an FP does, the FSRA's approach is captured through its understanding of FAs and FPs as stated in the FAQ section of their website.



The FSRA states:

“Financial Planners should have the breadth and depth of knowledge to develop integrated financial plans for clients. These financial plans would include a holistic analysis of a client’s financial circumstances. Financial planners are expected to be proficient in all of the core personal finance areas, *which include estate planning, tax planning, retirement planning, investment planning and alternatives, finance management, and insurance/risk management* [emphasis added].”

“Financial Advisors should have technical knowledge about at least *one common investment product* [emphasis added], as well as the necessary expertise and experience to develop suitable financial and investment recommendations for retail clients, based on their specific type of licence or designation.”

The FSRA takes a very narrow and product-centric view of what an FA does. Yet in reality, FAs and FPs, as well as all licensees, are bound by the KYC, KYP, and Conduct Rules which clearly evidence an expanded scope beyond what the FSRA contemplates in its title protection legislation and rules. The FSRA’s view of FAs appears out of step with current insurance and regulatory requirements and the findings of the FDM, subsequent committees, and legislation, all of which accepted the modern view of an advice driven business model.

While the FCAA and FSRA identified that some FAs, FPs and licensees may focus on a specific product or specific sector in the provision of advice, one cannot conclude that this restriction or specialization then applies to all within the group of FAs, FPs or licensees. Individuals within these broader groups may restrict the scope of their practise to focus on one class of product or sector in providing solutions. However, such specialization or restrictions should not minimize the broader educational requirements to qualify as an FA or an FP. In the case of an FA or an FP who selects to restrict their practise they must, nevertheless, have the requisite broad-based educational requirements. Such an approach makes the curative measure of disclosure effective – for example: J. Smith FA (Mutual Funds), J. Smith FA (Group Advisor) or J. Smith (Insurance Advisor). This ensures that the consumer gets advice from someone with comprehensive knowledge who may select products to achieve the client’s goals but only from the area of concentration or specialization. A requirement ensuring comprehensive knowledge assures clients that even FAs or FPs who work within a specialized area of concentration has the breadth of knowledge equal to the most advanced FAs or FPs.

The Saskatchewan Approach

The relevant sections within, *The Proposed Financial Planners and Financial Advisors Regulations* (“Proposed Regulations”) that replicate the errant thinking of the FSRA are found in Part 6 and 7.

Part 6 (1) relating to FPs states:

(b) subject to such educational requirements related to financial planning and associated matters that provide the technical knowledge, professional skills and competencies that would reasonably be expected of an individual providing financial planning recommendations and preparing financial plans, including, without limitation, educational requirements related to:

- (i) the Canadian financial services marketplace and regulatory environment;
- (ii) *estate planning, tax planning, retirement planning, investment planning, finance management and insurance and risk management* [emphasis added];
- (iii) ethical practices and professional conduct;
- (iv) dealing with conflicts of interest;
- (v) collecting personal and financial information;



- (vi) identifying client objectives, needs and priorities;
- (vii) providing suitable financial planning and investment recommendations to a client;
- (viii) *developing and presenting an integrated financial plan for a client* [emphasis added].

Part 7 (1) relating to FAs states:

(b) subject to such educational requirements related to financial advising and associated matters that provide the technical knowledge, professional skills and competencies that would reasonably be expected of an individual providing financial advice, including, without limitation, educational requirements related to:

- (i) the Canadian financial services marketplace and regulatory environment;
- (ii) *the products and services provided by the individual* [emphasis added];
- (iii) ethical practices and professional conduct;
- (iv) dealing with conflicts of interest;
- (v) collecting personal and financial information;
- (vi) identifying client objectives, needs and priorities;
- (vii) providing suitable financial and investment recommendations to a client.

Dispensing first with the absence of a section (viii) in Part 7 we note that it correctly captures the difference between the expertise that distinguishes an FP from an FA. The FP has the additional training, and experience necessary to create a comprehensive and integrated financial plan for their client. On this point it should be recognized that retail investors rarely have their FP prepare a financial plan. Further, the production of a financial plan is increasingly automated with the advisor inputting information into required fields that then generate a financial plan for the advisor to present to the client. Lastly, even absent the advanced training in developing financial plans, an FA, a licensed individual, or an individual who is not licensed by either the insurance or securities regulators can create a financial plan for their client.

The evolution within the fintech sector is redefining how financial advice and planning are consumed by clients. For instance, even those who are not credentialed to use the titles FA or FP can access sophisticated software that will prompt the advisor on the inputs needed with respect to the client so that a detailed financial plan can be generated. Further, technology has advanced to the point where consumers can work in a fully automated environment absent engaging a person, licensed or otherwise. This illustrates the problem associated with artificially establishing a low threshold for FAs in comparison to FPs. While FPs have undertaken advanced financial planning training, the fact that this process is now largely automated and used by FAs, contributes to consumers of advice seeing both FAs and FPs interchangeably. It further supports the notion that the BCP for both FAs and FPs should be more aligned.

Our concerns with items (ii) in Part 7, is the narrow and product-based focus. The reality is that FAs provide more than simply product-based recommendations. The product recommendation is provided only after an FA has discussed with the client their needs, objectives and goals as is required under KYC provisions in both the insurance and securities sector. Accordingly, an FA does engage in **estate planning, tax planning, retirement planning, investment planning, finance management** and insurance and risk management just as an FP may. We are strongly of the view that Part 7(1)(b)(ii) should be redrafted and replicate Part 6 (1)(b)(ii).

If a licensee elects to qualify to use the title FA or FP there must be a requirement that they have a comprehensive knowledge of areas relevant to their license and the areas of importance to their clients. Consumers rightly assume that FAs and FPs operate at a higher professional threshold. As such, it is incumbent on governments and regulators to ensure consumer protection by establishing rules and



regulations that both reflect the reality of what FAs and FPs do, as well as establish a threshold that meaningfully elevates the expectations on knowledge and advice provided well above the licensing requirements. Only then does the product recommendation come into play.

Part 6 and 7 of the Proposed Regulations rests on the same flawed premise we see in Ontario, which arbitrarily fixes a substandard threshold for FAs. The flawed premise is used to then develop an artificial gap between the level of professionalism and services provided by FAs in comparison to FPs. This will prove harmful to consumers as well as the evolution of financial services in an advice-based market increasingly impacted by fintech and Artificial Intelligence.

Consultation Question

Question 1

Credentialing Bodies – Process when Approval Revoked or Operations Cease

The FCAA is seeking feedback on how to transition credential holder from a credentialing body that is no longer active or approved for some reason, such as their approval was revoked or it is winding down operations. For title users that obtained a credential from an inactive or unapproved credentialing body please provide feedback as to whether those individuals should be able to continue using the FP or FA title in the absence of oversight by a credentialing body for a period of time and, if yes, how long that period of time should be.

While being mindful of concerns of FAs and FPs should their credentialing body either be unapproved as a credentialing body or cease operations as a credentialing body for any reason, the primary focus must be on the impact to clients who rely on the credential and credentialing body for both ensuring that standards are met and that conduct is monitored.

There are two discrete issues to be addressed. The first relates to supervision and oversight, and the second relates to standards established by credentialing bodies to qualify for the use of the title FA or FP.

With respect to oversight and supervision, a “client first” or “client’s best interest” approach would dictate that an FA or an FP does not go unsupervised for any length of time. From an FA or an FP perspective the cessation of a credentialing body should have minimal impact on their credential as the credentialing body was approved and in good standing when the credential was granted. As such, it can be argued that a short period of time between the cessation of the credentialing body and the absorption of FA or FP credential holders by a subsequent credentialing body seems inconsequential. However, complaints, investigations and misconduct cannot be ignored due to administrative gaps during transition periods. Credentialing bodies play an important role in the oversight of the conduct of FAs and FPs, and consumer interest dictates that oversight be seamless and continuous.

In any event where a credentialing body is no longer performing its duties, either an existing credentialing body must be assigned or selected for ongoing oversight of the FA or FP, or the FCAA must assume the role of the credentialing body until such a time when the FA or FP is absorbed by another credentialing body.

Subsequent to such selection or assignment, the continuing credentialing body can review the new FA or FP credentials to determine if they are acceptable to their membership, or if additional education or training is required. As the FCAA and FSRA have set minimum standards to qualify as a credentialing body, this does not preclude a credentialing body from setting standards for the use of the title FA or FP above those established by other approved credentialing bodies. Therefore, an FA or an FP may be required to successfully complete additional courses to qualify for the use of the title FA or FP with



the new credentialing body. While pursuing the required courses to qualify with a new credentialing body, a period of time can be granted for the continued use of the FA or FP title. A failure to successfully complete the required course(s) will result in the immediate loss of the right to the use of the title of FA or FP.

Question 2

Approval Criteria for FA Credentials

We are seeking feedback on whether the BCP for FA should be revised to take a broader approach to proficiency in technical areas and bring it closer to that of an FP. The technical knowledge requirement would include knowledge and competency in all of the same core financial technical areas the FP BCP (i.e. estate planning, tax planning, retirement planning, financial management, and insurance and risk management). The key difference between the FP BCP and the FA BCP would be that the FP will require knowledge and competency in respect of developing and presenting an integrated financial plan for the client; whereas an FA will require knowledge and competency in respect of providing suitable recommendations to a client with respect to broad-based financial and investment strategies. In considering this approach please comment on the potential advantages of the Comprehensive Approach identified above, namely better alignment with client expectation and better alignment with other existing financial sector regulatory frameworks. Also, please comment on whether there are any other advantages the Comprehensive Approach has over the Product-Focused Approach not identified in this paper.

We share the same serious concerns with other stakeholders speaking on behalf of consumers and advisors in noting deficiencies regarding the BCP for FAs. As Group Advisors we urge the FCAA to revisit and strengthen the BCP for FAs to align with the BCP of FPs. As noted earlier in our comments, the differentiator between an FA and an FP is the specialization with respect to developing a comprehensive and integrated financial plan for their client. We also emphasize that FAs can also create financial plans for their clients, and that fintech and IT advancements have resulted in software and engagement methods for FAs and licensees to produce financial plans for their clients. It makes little sense, given the fintech solutions at the disposal of anyone within the financial services field, consumer included, to place too great an emphasis on the specialized skills required to use the title of FP. Technology has leveled the playing field. Therefore, to artificially create a professional gap between one using the title FA over FP makes little common sense.

Title protection's primary objectives include a move to higher professionalism and enhanced consumer protection. As such, setting the threshold so low for the use of the title FA results in virtually no additional consumer protection. Further, it is an affront to FAs who currently operate to a level equal or comparable to FPs. Consider for the moment that most FPs do not create financial plans for their clients. They operate as FAs when not completing a financial plan. We call on the FCAA to establish a threshold for FAs that will make a meaningful impact on both the raising of the professional bar and consumer protection, and a recognition that FAs are and should be viewed and held to the standards of an FP absent the advanced planning requirements required to holdout as an FP.

The solution to the above noted concerns, as identified by the FCAA in its consultation document, is to focus on advice-based solutions and regulation. A product-focused approach to the BCP for FAs is counterintuitive and has resulted in the development of competencies that are out of step with the reality of what an FA does, and what a client would expect from an FA. A product-based approach results in redundancy with current licensing requirements established in both the insurance and securities sectors with respect to all licensees' know their product and know their client rules.



An FA is any qualified person/entity engaging in the business of providing financial advice to individuals or groups of individuals, including the collection and analysis of information about a person/group or business in developing strategies to achieve identified goals:

- To identify needs and risks
- To establish financial objectives
- To establish strategies to address identified needs and risks, and achieve the established financial objective

FAs must continuously monitor the needs and risks and progress towards the established financial objectives which would include all of or a combination of the following:

- The monitoring of cashflow management
- Capital needs assessment
- Education planning
- Retirement planning
- Investment planning
- Taxation and estate planning
- Insurance planning
- Business succession planning
- Employee benefits and retirement planning

The curriculum for any credential qualified for the use of the title FA must go beyond specific product knowledge and must demonstrate a mastery over a broad spectrum of requirements and knowledge.

Question 3

Decrease in Harmonization

Note that taking the above approach to require additional knowledge and competency for FAs would result in decreased harmonization between the FCAA framework and the FSRA's framework. This may result in different standards to meet and may mean that credentialing bodies would need to develop different educational programs. Furthermore, individuals who have a credential in Ontario may need additional qualifications to satisfy the criteria for Saskatchewan. While taking this alternate approach may reduce harmonization with Ontario's framework, it would also potentially improve the FA BCP alignment with client expectations and other existing financial regulatory frameworks. As such, we ask that you also address in your comments whether the benefits of increasing the proficiency required to hold an FA credential outweighs the decreased harmonization. Also please provide comments regarding any other disadvantages of the Comprehensive Approach not identified in this paper. If an increase in qualifications required to obtain an FA results in a need for consequential amendments to other aspects of the Proposed Regulations, please identify those amendments. One potential revision we have identified and would like comments on concerning whether the transition period for an FA's compliance with the FPFAA set out in section 9 (3) of the Proposed Regulations should be lengthened to match that of the FP.



With respect to decreased harmonization with the FSRA

Harmonization should never be placed above the needs and protection of clients/consumers.

Saskatchewan has identified an unintended flaw in the FSRA title protection framework as it relates to the BCP for FAs which cannot be ignored for the purposes of harmonization.

With respect to cost to market participants should Saskatchewan set the bar higher for FAs

Suggesting that a failure to replicate the to FSRA approach to BCP for FAs will result in a lack of harmonization and additional costs as participants will need to have two different standards depending on the jurisdiction they are operating under is a false narrative.

The FCAA and FSRA in establishing FA BCP note that they are setting a minimum standard which does not preclude participating credentialing bodies from exceeding these minimum standards. The FCAA may well set standards with respect to the BCP for FAs such that they reflect the true nature of what consumers expect from an FA. There is no additional cost associated should the credentialing body operating in Ontario adopt the higher standards established in Saskatchewan. One would expect a willingness on the part of credentialing bodies to want higher standards that will enhance consumer protection and outcomes. The FCAA in adopting a comprehensive approach in setting a BCP for FAs will be setting the stage for a race to the top. Such an approach invites other jurisdictions contemplating title protection to harmonize to a higher standard.

With respect to alignment with existing financial regulatory approach

Licensing requirements in the insurance and securities sectors require the licensee to know their product and know their client.

The KYP requirements in both the insurance and securities sectors cover the product knowledge requirements for licensees. To use a product-based approach for FA BCP is inconsistent with the evolution to regulation that started with the FDM. Absent a sound explanation by regulators for their bifurcated approach with respect the BCPs for FAs and FPs, we are of the view that the same comprehensive approach used for FPs be employed.

Question 4

Mandatory Disclosure of Credentials

We are seeking further feedback specifically on an enhanced disclosure requirement for FAs that would require FAs to disclose the product, if any that they are authorized to sell. Please comment on whether this additional disclosure requirement is preferred and the form that it should take. Please also comment on whether this additional disclosure is warranted if the Comprehensive Approach to the FA BCP, as described under the Approval criteria for credential heading, is adopted.

Disclosure should not focus on product, rather it should focus on advice and service. A focus on advice and service will naturally lead to product decisions.



To avoid risks associated with FAs or FPs who may limit their practise to a particular sector, product, or area of specialization, appropriate disclosure should be required. Examples would be an FA or an FP who is insurance licensed only, mutual funds licensed only, dual-licensed or selects to specialize such as a group advisor. Disclosure could be in writing on cards, letterhead, communications, corporate websites, and credentialing bodies' websites as follows:

- J. Doe FA (Insurance);
- J. Doe FP (Insurance);
- J. Doe FA (Mortgages);
- J. Doe FP (Mortgages);
- J. Doe FA (Mutual Funds);
- J. Doe FP (Mutual Funds);
- J. Doe FA (Insurance and Securities);
- J. Doe FP (Insurance and Securities);
- J. Doe FA (Group Advisor);
- J. Doe FP (Group Advisor).

An FA and an FP operating from the comprehensive approach to BCP would have considerable broad-based knowledge as a result of the credentialing process so the client can be assured that users of the protected title have the necessary broad-based competencies. However, development and implementation of advice from an advisor who has limited their services to a specific sector or limited product shelf, or a specialization that may not fit the client's needs may result in suboptimal results for the client. Ensuring appropriate disclosure is an effective curative measure that ensures consumers are able to identify an appropriate professional to assist them in achieving their financial goals.

Conclusion

The FCAA has the opportunity to address an unintended but inherent weakness which stems from a failure to properly establish the BCP for FAs. If left unaddressed this weakness will artificially establish a gulf between the professional standards between FAs and FPs, and place consumers at increased risk.

Thank you for the opportunity to provide our thoughts and BA looks forward to ongoing dialogue with the FCAA on this and future issues. Should you have any questions or require any clarification, please don't hesitate in contacting the undersigned.

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