

CHARTERED PROFESSIONAL ACCOUNTANTS OF ONTARIO  
*CHARTERED PROFESSIONAL ACCOUNTANTS OF ONTARIO ACT, 2017*

**DISCIPLINE COMMITTEE**

**IN THE MATTER OF:** Allegations against **DANIEL DIAMOND, CPA, CA**, a member of the Chartered Professional Accountants of Ontario, under **Rules 104.1, 202.2 and 206.1** of the CPA Code of Professional Conduct.

**BETWEEN:**

**Chartered Professional Accountants of Ontario  
Professional Conduct Committee**

**-and-**

**Daniel Diamond**

**APPEARANCES:**

**For the Professional Conduct Committee:** Kelvin Kucey, Counsel

**For Daniel Diamond:** Present  
Matthew Sammon, Counsel

Heard: July 18, 2024

Decision and Order effective: July 18, 2024

Release of written reasons: August 15, 2024

**REASONS FOR THE DECISION AND ORDER MADE JULY 18, 2024**

**I. OVERVIEW**

- [1] The Professional Conduct Committee of the Chartered Professional Accountants of Ontario (“PCC”) has alleged that Daniel Diamond, CPA, CA (“Diamond” or the “Member”) engaged in professional misconduct, by way of five separate Allegations.
- [2] This hearing was held to determine whether the Allegations were established, whether the conduct breached Rules 104.1, 202.2 and 206.1 of the CPA Code of Professional Conduct (the “Code”) and whether the conduct amounted to professional misconduct.
- [3] Diamond obtained his Chartered Accountant designation in 2009 and at the date of the hearing he held a Public Accounting Licence (“PAL”). He commenced his professional career with TZ LLP, now TZR LLP (TZR) in 2008. In 2016, Diamond was promoted to

partner. While at TZR, Diamond worked with a wide variety of private clients, performing assurance, tax and compilation engagements.

- [4] In September 2020, a dispute emerged between Diamond and TZR, which led to Diamond initiating an arbitration against TZR and certain of its partners.
- [5] In and around January 2021, Diamond departed TZR and joined GT LLP (GT) as a partner. He has been at GT ever since.

## **II. THE COMPLAINT AND THE ALLEGATIONS**

- [6] In and around January 18, 2022, while the arbitration between Diamond and TZR was ongoing, Diamond's former TZR partners filed a complaint against him, asserting professional misconduct relating to his role as lead engagement partner in the 2019 audits of TMI, its related companies, TTI and I&SWI, and other related compilation engagements.
- [7] On April 27, 2023, the PCC appointed Jason Kowalczyk, CPA, CA, CFE and Paul Rhodes, CPA, CA (the "Investigators") to investigate Diamond's professional conduct, standards of practice and the circumstances surrounding TZR's complaint. Rhodes was retained as an expert in GAAS, GAAP, CSQC1, CSQM1<sup>1</sup> and the standards of practice of the profession.
- [8] The Investigators reviewed the following assurance engagements:
  - a. Audit of the financial statements of TMI for the year ended December 31, 2019 (Trademark);
  - b. Audit of the financial statements of TTI for the year ended December 31, 2019 (Tools);
  - c. Audit of the financial statements of I&SWI for the year ended December 31, 2019 (I&S);
  - d. Review of the financial statements of BPI for the year ended May 31, 2022 (BPI);(Doc 4); and
  - e. Audit of the financial statements of AAP Inc. for the year ended January 31, 2023.
- [9] The Investigators released their report on September 27, 2023.
- [10] The main aspects of the Allegations, amended July 2, 2024, can be summarized as follows:
  - 1. That in relation to his audit of the financial statements of TMI and TTI for the year ended December 31, 2019, Diamond allowed his professional judgment to be compromised by bias, conflict of interest or the undue influence of others in that he failed to obtain independent evidence in support of claimed charitable donations, he reduced the scope and extent of audit procedures at the request of the client, and he acted as an advocate for the client in an effort to halt a planned credit withdrawal (Rule 202.2 of the Code);

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<sup>1</sup> Generally Accepted Auditing Standards, Generally Accepted Accounting Principles; Canadian Standard on Quality Control 1, and Canadian Standard on Quality Management 11.

2. That in relation to his audit of the financial statements of TMI for the year ended December 31, 2019, Diamond failed to perform his professional services in accordance with generally accepted standards of practice in that he failed to obtain sufficient appropriate audit evidence in relation to many of the elements of the audit and he failed to consider and audit the risk of material misstatement of the financial statements resulting from fraud (Rule 206.1 of the Code);
3. That in relation to his audit of the financial statements of TTI for the year ended December 31, 2019, Diamond failed to perform his professional services in accordance with generally accepted standards of practice in that he failed to obtain sufficient appropriate audit evidence in relation to many of the elements of the audit and he failed to consider and audit the risk of material misstatement of the financial statements resulting from fraud (Rule 206.1 of the Code);
4. That in relation to his review of the consolidated financial statements of BPI for the year ended May 31, 2022, Diamond failed to perform his professional services in accordance with generally accepted standards of practice in that he failed to obtain an understanding of the entity, failed to appropriately assess risks of material misstatement, and failed to obtain limited assurance that the financial statements were not materially misstated (Rule 206.1 of the Code); and
5. That in relation to his audit of the financial statements of TMI and TTI for the year ended December 31, 2019, Diamond failed to cooperate with the regulatory processes of CPA Ontario, in that he directed removal of the TMI and TTI audit files from a mandatory file listing subject to CPA Ontario's Practice Inspection process (Rule 104.1 of the Code).

### **III. PRELIMINARY ISSUES**

- [11] Counsel for the PCC raised two preliminary issues. The first issue related to the Amended Allegations dated July 2, 2024. The Hearing Panel (the "Panel") confirmed they had received the Amended Allegations.
- [12] The second issue related to a minor amendment to the Agreed Statement of Facts ("ASF"). Counsel for the PCC requested that the Panel correct an omission at paragraph 244 of the ASF. The original paragraph 244 of the ASF reads:

*Diamond admits that his conduct as detailed in the Allegations, as attached hereto as Schedule "A", and as evidenced herein, establishes substantive breaches of Rules 104, and 206.1 of the Code and constitutes professional misconduct.*

Counsel for the PCC requested that the paragraph be amended to include reference to Rule 202.2 of the Code. As counsel for the Member had no objection, the Panel agreed to read in to paragraph 244 of the ASF a reference to Rule 202.2 of the Code.

- [13] Counsel for the Member raised no preliminary issues.

#### IV. ISSUES

- [14] The Panel identified the following issues arising from the Allegations:
- A. Did the evidence establish, on a balance of probabilities, the facts on which the Amended Allegations by the PCC were based?
  - B. If the facts alleged by the PCC were established on the evidence on a balance of probabilities, did the Amended Allegations constitute professional misconduct?
  - C. If the Panel determined that the Amended Allegations constitute professional misconduct, should the Panel accept the proposed joint submission on sanction?

#### V. DECISION

- [15] The Panel found that the evidence established, on a balance of probabilities, the facts set out in the Amended Allegations of professional misconduct.
- [16] The Panel was satisfied that the Amended Allegations constituted a breach of Rules 104.1, 202.2 and 206.1 and, having breached these Rules, the Member had committed professional misconduct.
- [17] The Panel further accepted the proposed joint submission on sanction.

#### VI. REASONS FOR THE DECISION ON MISCONDUCT

##### *Findings Regarding the Conduct of the Member*

- [18] The parties filed an ASF which was made Exhibit 1. The parties provided supporting documentation for the ASF via a Document Brief, which was made Exhibit 2. The parties tendered no further evidence in the conduct portion of the hearing.

##### ***Background Facts***

##### ***Allegation 1: Allowing Professional Judgment to be Compromised by Bias, Conflict of Interest or Undue Influence, Contrary to Rule 202.2 of the Code***

- [19] Diamond oversaw the audit of the financial statements of TMI and TTI for the year ending December 31, 2019. The audit took place between December 1, 2019 and June 30, 2020. The client pressured Diamond to cut corners and proceed with haste, and Diamond succumbed to the pressure. The salient aspects of Diamond's misconduct can be summarized as follows:
- He permitted TZR to file a corporate tax return for TMI which claimed \$1,030,359 of charitable donations without obtaining sufficient information to confirm same;
  - In March of 2020, TTI urged Diamond to reduce the sample selection for TTI revenue. Diamond complied and despite his team's misgivings, he directed his team to reduce the sample size from 27 to 20. However, the audit file indicated that the sample size was in fact 27;

- In response to pressure from the client, Diamond cut corners and admitted to “selling stories” to a bank; and
- In November 2020, a major credit card company determined that it was at risk with respect to the corporate credit cards of TTI and TMI. As a result, the credit card company informed TTI and TMI that they would be reducing their credit from \$400,000 to \$0 by February 28, 2021. In response, Diamond wrote to the major credit card company advocating for his clients in an attempt to halt the planned credit withdrawal.

***Allegations 2 and 3: Failure to Perform Professional Services in Accordance with Generally Accepted Standards of Practice, Contrary to Rule 206.1 of the Code (TMI and TTI Audits)***

[20] In overseeing the audit of TMI’s and TTI’s financial statements for the year ended December 31, 2019, Diamond generally failed to obtain sufficient evidence with respect to many of the aspects of the audit. The main elements of Diamond’s failure to obtain sufficient evidence can be summarized as follows:

- TMI’s and TTI’s audits for 2018 were performed by a different company, BBPC. Diamond failed to obtain sufficient appropriate audit evidence about the opening balances. Diamond ought to have performed additional audit procedures on the 2018 balances during the 2019 audits of TMI and TTI but failed to do so;
- Diamond failed to obtain sufficient appropriate audit evidence to support the assessed control risk. Notwithstanding this failure, Diamond assessed the control risk for TMI and TTI as either low or medium. This was inaccurate as it should have been assessed as high;
- Diamond failed to effectively plan and execute the audits in that he failed to properly identify risk assessments to properly perform the audits; and
- Diamond supported a number of significant balance sheet items such as inventory, accounts receivable, cost of sales, loans payable, loans receivable, pre-paid expenses, income taxes, accrued liabilities, operating loan, and other expenses without obtaining sufficient evidence in support and without analyzing contradictory data.

[21] In overseeing the audits of TMI and TTI for the year ended December 31, 2019, Diamond failed to appropriately consider and audit the risk of material misstatement of the financial statements resulting from fraud.

[22] Diamond did not identify any potential scenarios in which fraud could occur in either of the plans for the TMI or TTI audits and did not consider any specific procedures necessary other than professional skepticism. Management override of controls was not considered a risk because all transactions were typically approved by the controlling shareholder. Revenue, related parties, potential bias in accounting estimates and the inappropriate use of journal entries were all considered to be low fraud risks.

[23] The incentive for management to misstate the TMI and TTI financial statements should

have been identified as a fraud scenario but was not. Given the circumstances, specific fraud risk factors should have been identified but were not and the pervasive risks to the financial statements should not have been assessed as low. The scope of audit procedures should have been increased for the areas that were at risk of misstatement, which included: revenue, purchases, and inventory, including cut-off, journal entries, related parties, and estimates. An increased scope could be achieved by, for example, increasing sample sizes and performing unpredictable audit procedures compared to the 2018 audit file.

- [24] Diamond failed to audit client prepared adjusted journal entries and failed to complete audit procedures to identify subsequent events. This was particularly concerning as the adjusted journal entries recorded in the TMI file exceeded \$225,000, relative to performance materiality of \$9,800. Adjustments of a lower but similar magnitude were made in the TTI file.
- [25] Diamond failed to appropriately consider and audit the risk of material misstatement of the financial statements due to bank covenants. Bank covenant requirements were not identified as a risk of material misstatement but should have been. The final financial statements for both TMI and TTI stated the companies were in compliance with financial covenants as at December 31, 2019. This, however, was inaccurate, and the failure of TMI and TTI to meet at least one bank covenant requirement cast significant doubt over their ability to continue as a going concern.
- [26] Diamond issued an unqualified audit opinion on financial statements that were materially misstated. For example, in the TMI audit, the working capital amount was overstated by \$3,735,063, being listed as \$4,770,481 when the accurate number was \$1,035,418. A similar overstatement was made in the TTI audit. Another example from the TMI audit is that earnings from operations were overstated in the amount of \$151,483.

***Allegation 4: Failure to Perform Professional Services in Accordance with Generally Accepted Standards of Practice, Contrary to Rule 206.1 of the Code (BPI Audit)***

- [27] BPI develops and sells integrated cloud-based software systems that manage inventory, accounts payable, service department and financial reporting for motorcycle and similar dealerships. BPI sells to customers in Canada and the United States and operates in Australia through a wholly owned subsidiary, BPIT.
- [28] The BPI review engagement was of the company's consolidated financial statements for the year ended May 31, 2022. The review was conducted in accordance with the requirements of Canadian Standard on Review Engagements 2400 Engagements to Review Historical Financial Statements. The review report was dated November 24, 2022 and the BPI financial statements were prepared in accordance with Accounting Standards for Private Enterprises.
- [29] Diamond determined materiality based on total expenses and determined a final materiality of \$60,000, calculated as 1.5% of total expenses. Financial statement users were the parent company, Canada Revenue Agency, potential investors, and the

Business Development Bank of Canada.

- [30] Diamond failed to obtain an understanding of the entity, failed to appropriately assess risks of material misstatement, and failed to obtain limited assurance that the financial statements were not materially misstated.
- [31] Diamond failed to obtain an understanding of the entity in that he failed to distinguish between BPI and BPIT. This was significant because BPIT had its own in-house accountant, and its records were located and maintained overseas. Diamond failed to identify and address the risks of material misstatement arising from BPIT.
- [32] Similarly, Diamond failed to obtain limited assurance as to whether the financial statements were free from material misstatement and had insufficient evidence to support a clean review report on the consolidated financial statements. As a result, Diamond's review report may have been inappropriate in the circumstances.

***Allegation 5: Failure to Cooperate with the Regulatory Processes of CPA Ontario, Contrary to Rule 104.1 of the Code***

- [33] In July 2020, CPA Ontario's Practice Inspection division ("PI") contacted TZR to arrange an inspection of TZR's assurance practice and requested the provision of a list of TZR's clients.
- [34] In preparation for an inspection, a practice inspector selects a sample of files for review and advises the member, or firm, of the selected engagements in advance of the inspection date. A practice inspector relies on the accuracy and integrity of the member generated engagement listing.
- [35] On or about July 16, 2020, Diamond advised TZR's inspection coordinator to remove the TMI and TTI audits from the TZR list, because they were not complete. As directed by Diamond, TZR removed the TMI and TTI audits from their firm list disclosed to PI, thereby evading potential regulatory review of those engagements.
- [36] Diamond's conduct concealed the TMI and TTI audits from PI. Diamond asked that the audits be removed from his engagement list because the files still needed to be reviewed and archived at the time of the practice inspection. However, the final signoffs in the TMI and TTI audits were completed one month before Diamond made the request to have them removed from the engagement list.
- [37] The TMI and TTI audits were the only engagements that Diamond requested be removed from the list because of alleged incompleteness. The TMI and TTI audits were ultimately crossed out and labelled "not completed" on the TZR client list that was sent to PI.
- [38] Diamond suggested he did not consider the file completed in July 2020 because it still had to be reviewed and archived then. However, the audit reports for the TMI and TTI audits were dated and issued June 16, 2020, and the last signoffs in the files were on June 17, 2020. TZR did not track archive dates. TZR's CaseWare server backups of the audits as at June 30, July 31, August 31, and September 30, did not identify any changes between the audit files or signoffs of these four backup copies of the files.

### *Finding of Professional Misconduct*

- [39] Through the ASF, Diamond admitted that these facts constitute professional misconduct in relation to the Amended Allegations before the Panel.
- [40] The Panel had no difficulty finding that Diamond had engaged in professional misconduct as set out in the Amended Allegations. Diamond's conduct in relation to the TMI and TTI audits was appallingly deficient and at times intentionally misleading. His instructions to his firm to remove the TMI and TTI audits from the engagement list provided to his regulator's PI division constitutes a troubling lack of integrity which is a clear breach of the Code.
- [41] The Panel concluded that the Amended Allegations, having been proven on a balance of probabilities, through clear and cogent evidence, constituted breaches of Rules 104.1, 202.2 and 206.1 of the Code.

### **VII. DECISION AS TO SANCTION**

- [42] The parties presented a joint submission on sanction to the Panel. The salient features of the joint submission can be summarized as follows:
1. The Member's membership in CPA Ontario is suspended for nine months commencing July 18, 2024;
  2. The Member's PAL is suspended for nine months commencing July 18, 2024;
  3. Fine of \$75,000 payable on or before July 18, 2025;
  4. Publication;
  5. Revocation in the event of non-compliance; and
  6. Costs in the amount of \$35,000 payable on or before July 18, 2025.
- [43] The Panel accepted the joint submission and issued an Order accordingly.

### **VIII. REASONS FOR THE DECISION AS TO SANCTION**

#### *The Sanction Portion of the Hearing*

- [44] Neither party adduced any evidence on penalty other than the Costs Outline provided by counsel for the PCC (Exhibit 3). The only evidence pertaining to the misconduct and to the Member, adduced by the parties was the ASF (Exhibit 1), and the accompanying Document Brief (Exhibit 2). The only facts the Panel could rely on were contained in these two exhibits. The facts set out in these reasons disclose very significant deficiencies, some of which were intentional, committed by a mid-career CPA and PAL holder. The Panel was particularly concerned by the manner in which Diamond allowed himself to be influenced by demanding clients who did not appear to be above board in their financial representations.
- [45] At the sanction portion of the hearing, Diamond failed to provide any of the type of



evidence the Panel would have expected to see in mitigation of such serious misconduct, e.g. character letters, a statement of remorse, or evidence of improved practices. The parties appeared to expect that the joint submission would automatically be accepted by the Panel. Indeed, when questioned about the joint submission, counsel for the PCC suggested that the Panel defer to the recommendation of the PCC given that there were experienced PAL holders on the Committee.

- [46] The Panel had no issue with the reasonableness of the proposed sanction in terms of general and specific deterrence. A nine-month suspension coupled with a \$75,000 fine is a significant burden for any professional to bear, and an appropriate response to the severity of the misconduct. The Panel was concerned however, that the sanction did not appropriately address the risk to the public. The Panel's concern was based on the dearth of evidence regarding why Diamond conducted himself as he did and what steps he had taken to reassure the Panel and the public that he would not conduct himself similarly in the future.
- [47] In light of our concerns, the Panel wished to hear from the parties as to why professional development courses in addition to the standard requirements, or a period of practice supervision were not in order. In accordance with the process set out in *R. v. Anthony-Cook*, the Panel went back to the parties after some deliberation, relayed their concerns and sought further information and submissions from the parties.
- [48] Counsel for the PCC advised the Panel that Paul Rhodes, one of the external investigators assigned to this matter, audited Diamond's files from GT and noted no issues. Counsel for the PCC submitted that Diamond had moved from TZR to GT and his behaviour markedly changed in response to the new firm culture. In light of this, the PCC was satisfied that Diamond had "course corrected" and that public protection did not require a period of supervision or further education. The Panel found this submission to be persuasive in going some distance to alleviate their concerns about public protection.
- [49] Counsel for the Member reiterated PCC counsel's submissions regarding the expert report of Paul Rhodes. He also helpfully informed the Panel that Diamond had voluntarily undertaken approximately 43 hours of professional development ("PD") courses, all of which were completed by February 2023. The Panel requested that counsel for the Member provide them with the list of courses, and this was provided shortly after the conclusion of the hearing. The Member completed over 43 hours of PD via eight courses. Seven of the courses focused on Assurance and Audit Engagements. The Panel found counsel's submissions to be responsive to the Panel's concerns about public protection.
- [50] Having heard from counsel, the Panel was persuaded that the Member had, as PCC counsel put it, "course corrected", and that further professional development courses or a period of practice supervision was not required to protect the public.

### *Analysis*

- [51] The Panel recognizes that a joint submission is entitled to a high level of deference. A joint submission should be accepted unless it is contrary to the public interest or would bring the regulatory process into disrepute because it was beyond the reasonable range of

sanction. In the words of Justice Moldaver in the matter of *R. v. Anthony-Cook*<sup>2</sup>:

[34] ... a joint submission should not be rejected lightly, a conclusion with which I agree. Rejection denotes a submission so unhinged from the circumstances of the offence and the offender that its acceptance would lead reasonable and informed persons, aware of all the relevant circumstances, including the importance of promoting certainty in resolution discussions, to believe that the proper functioning of the justice system had broken down. This is an undeniably high threshold — and for good reason, as I shall explain.

[52] While the reasoning in *R. v. Anthony-Cook* requires the Panel to accept a joint submission unless we can demonstrate it is not in the public interest to do so, there is a corollary obligation on counsel to provide the Panel with evidence in support of a joint submission and to “amply justify their position on the facts of the case as presented in open court”:

[54] Counsel should, of course, provide the court with a full account of the circumstances of the offender, the offence, and the joint submission without waiting for a specific request from the trial judge. **As trial judges are obliged to depart only rarely from joint submissions, there is a “corollary obligation upon counsel” to ensure that they “amply justify their position on the facts of the case as presented in open court”** (Martin Committee Report, at p. 329). **Sentencing — including sentencing based on a joint submission — cannot be done in the dark.** The Crown and the defence must “provide the trial judge not only with the proposed sentence, but with a full description of the facts relevant to the offender and the offence”, in order to give the judge “a proper basis upon which to determine whether [the joint submission] should be accepted” (*DeSousa*, at para. 15; see also *Sinclair*, at para. 14).<sup>3</sup> [emphasis added]

[53] In this matter, the Panel was not initially provided with evidence about the 43.25 hours of PD undertaken by the Member. Nor was the Panel informed about the content of Paul Rhodes’ report. While reference to the report was made in the ASF, there was no reference in the ASF to the fact that the Member’s files at GT had been reviewed and found satisfactory.

[54] Ultimately, in response to the Panel’s questions, the parties satisfied the Panel that the Member had rehabilitated himself by changing firms, undergoing an audit of his files where no concerns were raised, and voluntarily completing more than 43 hours of PD in the area of assurance and audit engagements. After receiving submissions outlining this information, the Panel was satisfied that the proposed sanction served the purpose of public protection.

[55] It would have been preferable, however, had counsel provided the Panel with the report of Paul Rhodes or at least a summary thereof. Counsel could have easily summarized the portions of the Rhodes’ report relating to the GT files and included the summary in the

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<sup>2</sup> [\*R. v. Anthony-Cook\*, 2016 SCC 43 ¶ 34](#)

<sup>3</sup> *Anthony-Cook*, *supra*, ¶ 54

ASF. Similarly, the evidence of the 43.25 hours of PD could have been provided as evidence on sanction. The Panel was not made aware of this information until it presented their concerns to the parties.

- [56] When the Panel presented their concerns to the parties, PCC counsel suggested they defer to the expertise of the PCC, some members of whom hold PALs. It is disrespectful and contrary to settled law to suggest that a Panel ought to defer to the expertise of the PCC. The PCC is a party to these proceedings, not the adjudicator. It is the Panel, not the PCC who must determine penalty. Moreover, many members of the Discipline Committee from which panels are composed also hold or have held PALs.
- [57] More importantly, the suggestion that the Panel ought to defer to the expertise of the PCC runs contrary to *R. v. Anthony-Cook* in that it deprives the public of their right to have the parties' positions "amply justifi[ed] ... on the facts of the case as presented in open court".
- [58] We hope these reasons serve to inform all counsel appearing before the CPA Ontario Adjudicative Tribunals in the future to uphold their duty to provide the Tribunal with evidence justifying a joint submission. Counsel ought not to presume that the Panel will accept a joint submission in the absence of supporting evidence.

## **IX. COSTS**

- [59] The law is settled that an order against a member for costs with respect to the disciplinary proceeding is not a penalty. Costs are intended to indemnify the PCC, based on the underlying principle that the profession, as a whole, should not bear all of the costs of the investigation, prosecution and hearing arising from a member's misconduct.
- [60] Costs are awarded at the discretion of the Discipline Committee. It has become customary for the PCC to file a Costs Outline in the same form as used in civil proceedings, and to seek 2/3 of the costs incurred in the investigation and prosecution of the matter.
- [61] In this matter, the PCC filed a Costs Outline (Exhibit 3). The PCC expended \$52,352.50 on the investigation and hearing of this matter. The parties jointly agreed to a costs award of \$35,000, which is approximately 2/3 of the PCC's actual costs. The Panel considered the proposed costs award to be reasonable and ordered that the Member pay \$35,000 in costs on or before July 18, 2025.

**DATED** this 15<sup>th</sup> day of August, 2024



Bernard S. Schwartz, FCPA, FCA  
Discipline Committee – Chair

### Members of the Panel

Jana Mareckova, Public Representative  
Marianne Park-Ruffin, Public Representative  
Barbara Ramsay, Public Representative  
Jaspreet Singh, CPA, LPA

Independent Legal Counsel  
Lisa Freeman, Barrister & Solicitor