

March 3, 2023

VIA ELECTRONIC SUBMISSION

British Columbia Securities Commission
Alberta Securities Commission
Financial and Consumer Affairs Authority of Saskatchewan
Manitoba Securities Commission
Ontario Securities Commission
Autorité des marchés financiers
Financial and Consumer Services Commission, New Brunswick
Superintendent of Securities, Department of Justice and Public Safety, Prince Edward Island
Nova Scotia Securities Commission
Office of the Superintendent of Securities, Service NL
Northwest Territories Office of the Superintendent of Securities
Office of the Yukon Superintendent of Securities
Nunavut Securities Office

C/O The Secretary
Ontario Securities Commission
20 Queen Street West
19th Floor, Box 55
Toronto, Ontario M5H 3S8
comments@osc.gov.on.ca

Re: Joint CSA and IIROC Staff Notice 23-329 - Short Selling in Canada

We commend the Canadian Securities Administrators efforts to address the short sale issues in the Canadian marketplace and welcome the opportunity to further discuss our views.

As a U.S.-based company listed in Canada, we recognize the differences in the two systems and would applaud efforts to address the regulatory framework around short-selling and consider something similar to the Securities and Exchange Commission's circuit breaker rule, implementing pre-borrow or locate requirements, and offering more transparency through reporting disclosures and in connection with prospectus offerings and private placements.

We believe that implementing these changes should help address predatory short selling activities and provide a stronger, more transparent market for all.

Please do not hesitate to contact us if you have any additional questions or comments.

Sincerely,

Gary Santo CEO

TILT Holdings (NEO: TILT)