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To:

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 of New  
Brunswick Superintendent of Securities, Department of Justice and Public Safety, Prince Edward  
Island  
Nova Scotia Securities Commission  
Securities Commission of Newfoundland and Labrador  
Registrar of Securities, Northwest Territories  
Registrar of Securities, Yukon  
Territory Superintendent of Securities, Nunavut

I am writing this letter in response to proposed changes to NI 31-103 Section 13.8.0/1, the payment of Referral Fees to external Referring Parties be limited to 25% of total Management Fees charged with a maximum payment period of 36 months.

These proposed changes are punitive and threaten not only my business model, but the financial well being of the 200 families that my office diligently serves with professional financial advice. The referral model that my office has chosen for suitable clients involves the payment of a referral arrangement fee that should more accurately be called a financial planning fee. This fee covers on going services to the families we work with in several areas such as, but not limited to:

- Retirement Planning
- Education Funding
- Tax and Estate Planning
- Investment Policy Statements
- Risk Assessment and Management
- Emotional Coaching as it relates to Financial Markets

These services are provided on a continuous and consistent basis, with families being contacted on average 18 times annually. Contact occurs with face to face meetings to update the various plans in place to achieve financial goals at a minimum annually, telephone conversations to assist and answer queries, and information and educational email campaigns. Our office allows clients to choose a minimum number of times my office contacts them with the use of a call/meeting rotation using our Customer Relationship Management Software. My office is proactive with our client contact, not reactive. Limiting a financial planning fee in amount and tenure will remove all these services provided by referring advisors and create inequities with individuals offering mutual funds, segregated funds, and other investment platforms.

The referral fee model works well for our clients. It removes any investment choice bias by the advisor, allows the advisor to focus on matching an asset mix to a client's risk tolerance, time horizon, and financial goals, and directs the focus of the client advisor relationship to the creation, monitoring, and maintenance of financial plans. The referral fee platform is completely transparent regarding fees, it creates personalized portfolios, and gives clients access to their portfolio manager. With these portfolio managers having a required fiduciary duty to act in the best interest of the client, my families are comfortable and confident in the handling of their life savings.

The proposed changes should not have a limit on payment period to reflect the on-going nature of professional planning services and should be offered in scope as an equal to the service fees available on other investment platforms.

Thank you for your consideration.

Best Regards,



Jamie Graham, CFP



