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Sept. 30, 2010

British Columbia Securities Commission  
Alberta Securities Commission  
Saskatchewan Securities Commission  
The Manitoba Securities Commission  
Ontario Securities Commission  
Autorite des marches financiers  
New Brunswick Securities Commission  
Registrar of Securities, Prince Edward Island  
Nova Scotia Securities Commission  
Superintendent of Securities, Newfoundland and Labrador  
Registrar of Securities, Northwest Territories  
Registrar of Securities, Yukon Territory  
Registrar of Securities, Nunavut

Anne-Marie Beaudoin, Corporate Secretary  
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John Stevenson, Secretary  
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**RE: Proposed amendments to National Instrument 31-103 and 33-109**

Dear Sirs and Madams,

We wish to thank the Canadian Securities Administrators (CSA) for once again providing firms with the opportunity to comment on the proposed amendments to National Instrument 31-103 and consequential changes to NI33-109.

The Registration Officers at Edward Jones have carefully reviewed the proposed amendments, specifically the NRD amendments and agree with the proposals which are minor and designed to provide clarification. We wish to provide further comments and recommendations for additional changes that we feel are significant.

**Form 33-109F3 Open a Location**

Item 2 on the above form indicates both relevant categories for IIROC and MFDA registrants: Supervisor or Branch Manager.

Form 33-109F4 Item 9.4 only shows Name of Branch Manager. Since Branch Manager is no longer an IIROC category this field should be updated to indicate Name of Supervisor or Branch Manager.

**Item 10 – Schedule G – Current Employment, other business activities**

Schedule G - Section 5. Conflict of interest

We agree with the amendments to this section which requires a response to all questions relating to conflict of interest. As IIROC member firms must also confirm whether the other business activity results in a shared premise situation with another financial services entity we recommend the addition of section 5(F) to provide a response to that question. This would ensure disclosure in a consistent format and significantly reduce deficiencies.

**Item 14 - Criminal disclosure**

In paragraph 2 of the guidance notes applicants are advised that they must disclose offences even if an absolute or condition discharge has been granted (except as per outlined exceptions) or the charge has been dismissed, withdrawn or stayed.

If charges were dismissed or withdrawn, the individual was (a) not found guilty, (b) did not receive a discharge and (c) the charges are no longer outstanding. Therefore disclosure under Item 14.1, 14.2 and Schedule K is not required or applicable. Reference to withdrawn or dismissed charges should be removed.

**Item 16 Bankruptcy**

We find the requirement to provide a listing of all individual creditors included in a bankruptcy or proposal which has been discharged to be superfluous. It should be sufficient to provide the total outstanding amount owing at the time of the bankruptcy or proposal.

**Form 33-109F4 – Instruction to applicant**

Instructions contained in Form 33-109F4 Application for Registration advises an applicant to contact the compliance, registration or legal department of the sponsoring firm or a legal advisor if they have any questions relating to the information contained on the application.

Unless the legal advisor is familiar with securities regulations pertaining to disclosures they could provide the registrant with inappropriate advice. We have had this occur on a number of occasions where applicants failed to provide required information based on advice received from an outside legal source.

We recommend the removal of the reference to legal advisor.

We appreciate your consideration of our proposals. Should you have any questions regarding our comments please contact the undersigned at the above number.

Sincerely,

Judy Nicholson  
EDWARD JONES  
Dept. Leader  
Compliance - Securities Registration