

Legislative
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Office of the Integrity Commissioner
The Honourable J. David Wake, Commissioner

Bureau du commissaire à l'intégrité
L'Honorable J. David Wake, Commissaire

CONFIDENTIAL

May 25, 2022

Leonard H. Goodman
Chairman and Founder
The Life Insurance Settlement Association of Canada
2300 Yonge Street P.O. Box 2401 Toronto, ON M4P 1E4

Sent by email: leonard@firstfinancialgroup.ca

Dear Mr. Goodman,

Re: Investigation File Number CAS-03015

On March 15, 2021, my Office advised you that I was commencing an investigation into whether you may have violated the *Lobbyists Registration Act, 1998* (the “Act”). Specifically, my investigation was to determine whether, as senior officer of Life Insurance Settlement Association of Canada (“LISAC”), you contravened subsection 6(1)(a), by failing to file a return with the registrar within two months after the day on which LISAC employed an in-house lobbyist.

I am writing to advise you that I have decided to exercise my discretion under s.17.1(3) of the Act to cease this investigation at this time.

As you are now clearly aware, the senior officer of an organization is required to file a return when the definition of in-house lobbyist is met, that is when employees, officers and directors who are compensated for their duties have collectively lobbied for 50 hours in any twelve-month period. In addition to time spent in meetings, telephone calls, and other direct communications with public office holders, senior officers are required to count time spent by employees and paid officers and directors in grass-roots communication, as this term is defined in the Act.

This investigation began because of the evidence on LISAC’s website that it was lobbying and specifically with respect to Bill 219. The Notice of Investigation was provided on March 15, 2021 but this investigation took an inordinate and inexcusable amount of time and resources because of:

- (a) your personal decision to refuse to co-operate with my investigators' requests for information and to refuse to appear for an interview in response to my summons; and
- (b) the time required to corroborate and confirm your evidence because of the significant discrepancies between your evidence and the documentary record, your refusal to answer directly relevant questions and your stated failure to recall your participation in the Bill 219 Forum for MPPs which is clearly documented.

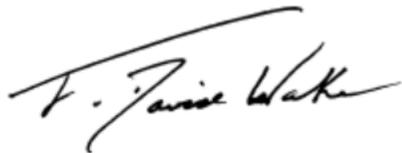
Despite your lack of co-operation, I am ceasing this investigation on the basis of the evidence gathered to date which does not support a finding that paid employees or officers of LISAC collectively lobbied for 50 hours or more within a twelve-month period.

However, I note that there is some evidence of use of resources of First Financial Group in your efforts, including your email address, and that you refused to provide the name of the person who updates the LISAC website for you. I also note that you have made public statements that you plan to campaign to pass Bill 219.

Going forward, given your clear connection to First Financial Group, I remind you that the senior officer of First Financial Group also has a responsibility to track the time spent on all lobbying activities by employees, officers, and directors who receive any form of payment or compensation. This includes a responsibility to track grass-roots communication.

A response to this letter is not required.

Yours sincerely,

A handwritten signature in black ink, appearing to read "J. David Wake". The signature is fluid and cursive, with a long horizontal stroke at the top.

The Honourable J. David Wake
Integrity Commissioner