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To: [OBSI Public Affairs](#)
Cc: library@chrc-ccdp.gc.ca; [Chrystia Freeland, P.C., M.P.](#); [Faircanada Info](#)
Subject: Comments solicitation deadline Jann 2023
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Dear Mr Wright

There are some bodies that need to be better informed and also to be encouraged to provide input

One in particular being the Canadian Human rights commission

Currently some of its staff aren't even aware that bank owned dealer firms come under the chrc remit. Even though the Bank act is very clear as is osfi.

So structurally if you really are in earnest about preventing investor harm the obsi also needs to improve its own staff awareness tied to discriminatory policies and practices deeply embedded in the financial/banking industry.

This tied to grounds of age given why the public open accounts, and the decades long cumulative process. And adverse effect of certain long tolerated practices (see the AG of Ont comment regarding the OSC and it's footdragging on fees that has cost the public billions)

Does your body even recognize barriers to equal opportunity to participate in the capital markets, or does it just deflect this and deceptively worded liability disclaimers as simply being a flawed decision making issue by retail investors, rather than serious compliance malfeasance and other predatory behaviours that are enable by the terms of service retail must consent to on a take it or leave it basis despite how they handcuff the retail investor and enrich the financial service industry and also sidestep best practice expectations on the part of the osfi.

I would suggest that any structural adjustments to the obsi include members that understand contract law, what informed consent is, and also have the will to address this. In addition to outright contravention of securities law and Banking regulations.

And further have the will to address self serving terms of service set out by industry rather than seeking to blame the public for flawed "decision making" .

So it isn't just refreshing the structure of board members for your organization but specific areas of competency that need to be reviewed.

The I submit this with respect. I have several examples of problematic terms of service and practices long tolerated by industry regulatory bodies that are very harmful to the investing public including those using the services of bank owned dealer members. And none of this has been addressed by the obsi. Why not?

Barrier to equal opportunity and discriminatory policies and practices can also have as serious a negative outcome as those currently targeted by venues of redress.

The lack of bit for your recommendations remains evidence of "tokenism" rather than a serious will to protect the best interests and legal right of investors using bank owned services.

Yours truly

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