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BRITISH COLUMBIA SECURITIES COMMISSION
Securities Act, RSBC 1996, c. 418

Citation: Re David Charles Greenway, 2025 BCSECCOM 74 Date: 20250228

Notice of Administrative Penalty

David Charles Greenway

Section 162.01 of the Securities Act, RSBC 1996, c. 418

Summary of Alleged Contraventions and Conditional Findings

1. Staff submitted a report (the Report) alleging that David Charles Greenway contravened item 7.2.1 of Form 51-102F5 *Information Circular* (the Form), by authorizing, permitting or acquiescing to acts of five reporting issuers, and recommending I impose an administrative penalty under section 162.01 of the Act.

2. Based on the information in the Report, together with staff's Supplemental Submissions dated November 26, 2024, and subject to Greenway's right to dispute the allegations or amount of the penalty under section 162.04, I consider that:

   - Greenway has contravened sections 9.1(2)(a) and 9.3 of National Instrument 51-102 *Continuous Disclosure Obligations* and item 7.2.1 of the Form; and
   - It is in the public interest to require Greenway to pay an administrative penalty of $25,000.

3. My reasons follow.

Facts

4. Greenway is a resident of British Columbia.

5. In a decision dated February 12, 2012, following an admission by Greenway that he engaged in insider trading contrary to section 57.2(2) of the Act, a hearing panel of the Commission ordered that he:

   (a) cease trading in, and be prohibited from purchasing, any securities or exchange contracts of any issuer that he was in a special relationship with for five months or until he paid his administrative penalty, and

   (b) pay an administrative penalty of $19,177 (the Order).

See *David Charles Greenway and Kjeld Werbes* 2012 BCSECCOM 59.

6. Greenway advised through counsel (via a letter dated February 5, 2024 found in Exhibit A to the Report) that he acted as a director (and in some cases, officer) of the following reporting issuers (the Reporting Issuers) for the following dates:

Reporting Issuer	**Position(s)**	**Dates (as of February 5, 2024)**
Majuba Hill Copper Corp. (formerly Bam Bam Resources Corp.)	Director CEO President	September 11, 2018 – Present
Montego Resources Inc.	Director	July 23, 2019 – Present
Quantum Battery Metals Corp.	Director CEO	April 3, 2019 – Present April 3, 2019 – April 23, 2021
Recharge Resources Ltd.	Director CEO President	May 10, 2022 – Present
Ultra Brands Ltd. (formerly Feel Foods Ltd.)	Director CEO	August 23, 2021 – Present

7. As set out in Exhibits A-K of the Report, the Reporting Issuers filed ten management information circulars (the Circulars) on the following dates. In each case, the Circulars were filed in connection with the solicitation of proxies for shareholder meetings in which Greenway was nominated for election as director.

Reporting Issuer	**Information Circular Dates & Filing Dates**
Majuba Hill Copper Corp. (formerly Bam Bam Resources Corp.)	Dated Nov 4, 2020; Filed Nov 13, 2020 Dated Nov 4, 2021; Filed Nov 15, 2021 Dated Nov 9, 2022; Filed Nov 16, 2022
Montego Resources Inc.	Dated June 28, 2021; Filed July 12, 2021 Dated May 1, 2023; Filed May 24, 2023
Quantum Battery Metals Corp.	Dated June 28, 2021; Filed July 12, 2021

Recharge Resources Ltd.	Dated July 15, 2022; Filed July 26, 2022 Dated Jun 21, 2023; Filed June 27, 2023
Ultra Brands Ltd. (formerly Feel Foods Ltd.)	Dated Oct 20, 2021; Filed Oct 25, 2021 Dated May 1, 2023; Filed May 8, 2023

8. None of the Circulars disclosed the Order.

9. The Montego Circulars dated June 28, 2021 (page 12, para. d) and May 1, 2023 (page 13, para. d) and the Quantum Battery Metals Circular dated June 28, 2021 (p. 19, para. c) stated that none of the proposed directors had been subject to any penalties or sanctions imposed by a securities regulatory authority. In other words, three of the Circulars not only omitted the Order, but also contained a false statement that Greenway had not been sanctioned or penalized by the Commission.

10. The Majuba Hill, Montego, Recharge and Ultra Brands circulars indicate that the contents of the circular and the sending or mailing to shareholders were approved by the directors or board and contain Greenway's typed-in signature, except the May 1, 2023 Montego circular contained the signature of a different director.

11. Greenway advised through counsel that to the best of his knowledge, all of the Circulars were prepared by legal counsel based on a precedent and then forwarded to Greenway and management for his review and approval. He was not aware of the requirement in item 7.2.1 of the Form to disclose the Order.

12. When asked why he did not ensure those issuers corrected those statements, Greenway advised again that he was not aware of the requirement to disclose the order in item 7.2.1 of the Form. Legal counsel would prepare the circulars based on precedents from previous years. They would then be circulated to Greenway once they were near completion for his final review. He would then review the circulars for personal and corporate information. Greenway inadvertently overlooked connecting that the sanctions previously levied against him in 2012 would be required under the relevant section of the Form.

Submissions

13. Staff submitted that Greenway contravened item 7.2.1 of the Form by authorizing, permitting or acquiescing in the Reporting Issuers' failure to disclose the Order.

14. I asked staff the following questions:

    (a) The Form itself does not require any particular person to file or send the Form on any particular timeline; it merely sets out the information that must be included in an information circular. It appears that the Form must be read together with Part 9 of NI 51-102. Are staff asserting that Mr. Greenway contravened the Form or that he contravened sections 9.1 or 9.3 of NI 51-102 (or both)?

    (b) If staff are alleging contraventions of sections 9.1 or 9.3 of NI 51-102, the reporting issuers appear to have sent and filed information circulars, so are staff saying the contravention is that the information circulars were not "completed" as required by the definition in section 1.1(1) of NI 51-102?

    (c) Section 168.1(1) of the Act prohibits false or misleading required filings. Are staff in substance alleging a contravention of the Act rather than a regulation? Contraventions of the Act cannot currently be addressed through the administrative penalty power in section 162.01 of the Act. Can a particular act be a contravention of both a regulation and the Act?

15. To summarize, staff responded that:

    (a) Item 7.2.1 of the Form must be read together with sections 9.1(2)(a) and 9.3 of NI 51-102 to determine who is responsible for compliance with that requirement.

    (b) Item 7.2.1 of the Form is a distinct regulatory requirement that when contravened can by itself form the basis for an administrative penalty under section 162.01 of the Act.

    The Form is a regulation that has the force of law. It is part of B.C. Reg. 110/2004.

    Whether a form included in legislation creates enforceable obligations is a matter of statutory interpretation: *Houde v. Quebec (Catholic School Commission)*, [1978] 1 S.C.R. 937. Unlike in *Houde*, in which the plaintiff unsuccessfully argued that a non-mandatory form for recording meeting minutes created a prohibition against secret ballots, item 7.2.1 of the Form is highly prescriptive and creates a clear and unambiguous obligation on issuers to disclose details of past penalties or sanctions.

    (c) Alternatively, Greenway contravened sections 9.1(2)(a) and 9.3 of NI 51-102 by failing to send and file a "completed" Form as required.

"Completed" is not defined in the Act or regulations and staff did not find any cases on what it means. However, they referred me to *Solara Technologies Inc. and William Dorn Beattie*, 2010 BCSECCOM 163, which considered when an offering memorandum that is not "in the required form" would render a distribution of securities under that offering memorandum illegal. The panel suggested that mere non-compliance with the form would not be enough; the distribution would be illegal when "cumulative effect" of the deficiencies renders the offering memorandum "misleading in a material respect". Staff submitted that the failure to disclose Greenway's past discipline affected the substance of the form and rendered the Circulars misleading in a material respect.

(d) The same conduct may form the basis for parallel contraventions of the Act and the regulations. The executive director has the discretion to pursue whichever enforcement action they think will result in an appropriate regulatory response in the public interest considering the specific circumstances of the conduct.

Law

16. During the period that the Circulars were filed, section 168.1(1)(b) of the Act provided as follows:

> **False or misleading statements prohibited**
>
> 168.1 (1) A person must not
>
> ...
>
> (b) make a statement or provide information in any record filed, provided, delivered or sent under this Act, or in relation to a service provided by the commission, that, in a material respect and at the time and in light of circumstances under which it is made, is false or misleading, or omit facts from the statement or information necessary to make that statement or information not false or misleading.

17. Sections 1.1(1), 9.1.(2)(a) and 9.3 of NI 51-102 provided that:

> **PART 1 DEFINITIONS AND INTERPRETATION**
>
> 1.1 Definitions and Interpretation
>
> (1) In this Instrument:
>
> …
>
> "information circular" means a completed Form 51-102F5 Information Circular; …

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PART 9 PROXY SOLICITATION AND INFORMATION CIRCULARS

9.1 Sending of Proxies and Information Circulars

…

(2) Subject to section 9.2 [Exemptions from Sending Information Circular], a person or company that solicits proxies from registered holders of voting securities of a reporting issuer must,

(a) in the case of a solicitation by or on behalf of management of a reporting issuer, send an information circular with the notice of meeting to each registered securityholder whose proxy is solicited;

…

9.3 Filing of Information Circulars and Proxy-Related Material

A person or company that is required under this Instrument to send an information circular or form of proxy to registered securityholders of a reporting issuer must promptly file a copy of the information circular, form of proxy and all other material required to be sent by the person or company in connection with the meeting to which the information circular or form of proxy relates.

18. Part 1, item (h) of the Form provided as follows:

Omitting Information

You do not need to respond to any item in this Form that is inapplicable. You may also omit information that is not known to the person or company on whose behalf the solicitation is made and that is not reasonably within the power of the person or company to obtain, if you briefly state the circumstances that render the information unavailable.

You may omit information that was contained in another information circular, notice of meeting or form of proxy sent to the same persons or companies whose proxies were solicited in connection with the same meeting, as long as you clearly identify the particular document containing the information.

19. Item 7.2.1 of the Form provided as follows:

7.2.1 Describe the penalties or sanctions imposed and the grounds on which they were imposed, or the terms of the settlement agreement and the circumstances that gave rise to the settlement agreement, if a proposed director has been subject to

(a) any penalties or sanctions imposed by a court relating to securities legislation or by a securities regulatory authority or has entered into a settlement agreement with a securities regulatory authority; …

20. Section 162.05 of the Act provides as follows:

Administrative penalty against officers or directors imposed by notice

162.05 If the executive director considers that a person other than an individual has committed a contravention, an employee, officer, director or agent of that person who authorizes, permits or acquiesces in the contravention is considered to have committed the same contravention, whether or not the executive director has issued to the person a notice of administrative penalty under section 162.01.

Analysis

21. It is clear from the Report that the Reporting Issuers solicited proxies from their security holders and so were required under NI 51-102 to send and file information circulars, which they did. The Order is the type of sanction that must be disclosed under item 7.2.1 of the Form. It is clear that the Reporting Issuers did not disclose the Order in the Circulars. It is also clear that by his review and approval of the Circulars, Greenway authorized, permitted or acquiesced in the failure to include disclosure of the Order in the Circulars.

22. I agree with staff that the Form is a regulation and has the force of law. It was adopted as part of B.C. Reg. 110/2004, which indicates it was adopted under the rule making power in section 184 of the Act.

23. That said, I respectfully disagree with staff that the requirement to disclose sanctions and penalties in the Form is a standalone requirement. The wording of Item 7.2.1 above clearly calls for a description of penalties and sanctions imposed by a securities regulator, but it does not say who must provide the disclosure or when the information circular containing it must be sent or filed. In my view, Item 7.2.1 clearly has to be read together with sections 9.1(2)(a) and 9.3 of NI 51-102, which require an issuer to send a completed information circular when proxies are solicited and file it promptly.

24. So did the Reporting Issuers contravene sections 9.1(2)(a) and 9.3 of NI 51-102 and Item 7.2.1 of the Form when they failed to disclose the Order or said that none of the proposed directors had been sanctioned?

25. The interpretive challenge is that the Reporting Issuers did send and file the Circulars in connection with their proxy solicitations, as the plain wording of sections 9.1(2)(a) and 9.3 of NI 51-102 require. The question is whether sections 9.1(2)(a) and 9.3 of NI 51-102 and the Form read, together, require an information circular to be filled out accurately. The definition of information circular in section 1.1(1) of NI 51-102 is a "completed Form 51-102F5 Information Circular". Should the word "completed" be interpreted to mean that information circulars must not contain any omissions or false statements in relation to items required by the Form?

26. Staff advised that "completed" is not defined in the Act or regulations and that they were unable to find any cases interpreting that term.

27. According to the Oxford English Dictionary (https://www.oed.com), "completed" means "finished, made complete". "Complete" means "having all its parts or members; comprising the full number or amount; embracing all the requisite items, details, topics etc.; entire, full." These definitions focus on whether "all" aspects of something are present versus the quality or accuracy of those component parts.

Circulars that Omitted Disclosure of the Order

28. Applying this definition to this case, I think it is reasonable to say that the Circulars filed by Majuba Hill, Recharge Resources and Ultra Brands that merely omitted disclosure of the Order were not "completed" because they did not contain all of the disclosure that the Form called for.

29. This interpretation is consistent with Part 1, item (h) of the Form, quoted above. Item (h) sets out the types of information that can be omitted from an information circular. Items that are inapplicable, information not known to an issuer, and information already disclosed in other proxy material for the same meeting can be omitted. The Form addresses the types of information that can be omitted. Directly relevant information like the Order against Greenway does not fall into any of the categories of information that can be omitted.

30. I considered whether there is an argument based on the *Solara* case cited above that the Circulars should be considered "completed" because they were not "misleading in a material respect", but I do not find such an argument convincing.

31. In *Solara*, the panel expressed the view at para. 143 that not every failure to comply with the disclosure requirements in the form of offering memorandum would render the offering memorandum prospectus exemption unavailable; only disclosure flaws that rendered the offering memorandum misleading in a material respect would do so. In this case, the Circulars appear to have largely complied with the Form, so perhaps one could argue that they should be considered "completed".

32. However, I do not find such an argument compelling. *Solara* addressed the issue of whether an offering memorandum was "in the required form" for the purposes of the availability of a prospectus exemption, not whether an information circular was "completed". The case interpreted different words. The panel's comments on this issue were also *obiter*, since it decided whether the prospectus exemption was available based on other factors.

33. Furthermore, even applying the test in *Solara*, I agree with staff that omitting a proposed director's disciplinary history *does* render the Circulars misleading in a material respect. In Re Patrick Aaron Dunn 2022 BCSECCOM 461 a Commission panel considered whether Mr. Dunn and his company breached sections 50(3)(a) and 168.1(1)(b) of the Act by failing to disclose details of Dunn's regulatory history in its offering documents while raising capital in reliance on the start-up crowdfunding exemption to the prospectus requirement. At para. 117, the panel finds that the omission was false or misleading in a material respect:

> Regarding the issue of materiality, we find that the statements were material on both the test of the extent to which they departed from the truth and the test of the significance of the misinformation that was false or misleading. The degree of departure from the truth is significant because the omissions misled investors to believe that there was no cause for concern about Dunn's regulatory history, when the opposite was true. The significance of the false information and omissions was, for the reasons set out above in our discussion of the section 50(3)(a) test, sufficient to meet the "material respect" requirement.

34. In summary, I find that Greenway contravened sections 9.1(2)(a) and 9.3 of NI 51-102 and Item 7.2.1 of the Form because:

(a) Majuba Hill, Recharge Resources and Ultra Brands sent and filed Circulars that were not "completed" because they omitted disclosure of the Order, and

(b) Greenway, a director of each of these issuers at the time they sent and filed the Circulars, authorized, permitted or acquiesced in these contraventions.

Circulars that Stated Greenway Had Not Been Sanctioned or Penalized

35. The Montego and Quantum Battery Metals Circulars do not merely omit the Order; they stated that no director proposed for election had been sanctioned by a securities regulatory authority. Should those Circulars be considered "completed"? In other words, does "completed" mean not only that the form requirements were addressed, but also that they were addressed accurately? In my view, the word "completed" only requires that all form items be addressed, not that all of the disclosure was accurate.

36. Going back to the dictionary definition of “completed” that is quoted above, it means that all aspects of something are present. Unlike with the other Circulars discussed above, the Montego and Quantum Battery Metals Circulars did address all of the form requirements. Based on the plain wording of NI 51-102, I think Montego and Quantum Battery Metals complied.

37. At first blush, it seems absurd that an omission would be a contravention of NI 51-102 and a false statement would not be. In my view, the purpose of sections 9.1(2)(a) and 9.3 of NI 51-102 and the Form is to provide shareholders with information to inform their voting decisions. It would undermine the purpose of those provisions if the disclosure could be inaccurate. It would be illogical to interpret NI 51-102 in this way if it meant there could be no consequences for false statements in an information circular. However, we have to read these regulations in the context of the Act. Under section 168.1(1)(b) of the Act, a person must not make a statement or provide information in a record filed or sent under the Act, that, in a material respect and at the time and in light of circumstances under which it is made, is false or misleading. So looking at the entire scheme of the Act and regulations, there can be regulatory consequences for false statements in information circulars, but they need to be addressed as contraventions of the Act, as was done in *Dunn*. Consequences for false statements exist, but they cannot be imposed through the administrative penalty procedure in section 162.01 of the Act, which is currently only available for contraventions of a regulation.

38. This outcome is consistent with the current legislative framework for administrative penalties in section 162.01 of the Act. By limiting the administrative penalty process in section 162.01 to contraventions of regulations or a decision of the Commission, unless and until a provision of the Act is prescribed under that section, it appears that the Legislature currently intends this tool to be used for less serious contraventions of securities legislation. Making a false statement is more serious than simply omitting a required form item. Therefore, it may be fitting that false statements should be prosecuted as a violation of the Act through the normal administrative enforcement hearing process before a panel, versus as a breach of a regulation through the “opportunity to be heard” process in section 162.01 of the Act.

39. In summary, I am unable to conclude that the information circulars sent and filed by Montego and Quantum Battery Metals were not “completed”. Therefore, I am unable to find that those companies contravened sections 9.1(2)(a) and 9.3 of NI 51-102 and the Form or that Greenway authorized, permitted or acquiesced in contraventions of those requirements.

Administrative Penalties

40. Since I have found that Greenway contravened NI 51-102, including the Form, I must consider whether it is in the public interest to require Greenway to pay an administrative penalty, and if so, what amount is appropriate in the circumstances considering the factors set out below from section 162.02(1) of the Act. Penalties are protective and preventative and intended to prevent future harm. They can address general as well as specific deterrence and must be proportionate and reasonable.

41. Staff submitted that it would be in the public interest to require Greenway to pay an administrative penalty in the range of $30-40,000 assuming contraventions in all ten Circulars.

Past Conduct

42. As discussed above, in 2012 Greenway admitted to insider trading and received market bans and a $19,177 administrative penalty. In its sanction decision, the panel accepted that Greenway's contravention was unintentional and based on ignorance of the law.

Seriousness of the Conduct

43. In seven Circulars, Greenway failed to disclose a significant fact that could have impacted investors' voting decisions or decisions to buy shares of the relevant companies. However, there is no specific evidence of investor harm. I acknowledge that companies and their directors and officers make mistakes in their required disclosure from time to time and many of them are not serious enough to warrant a formal sanction.

44. I also have no basis to question Greenway's assertion that he was unaware of the requirement to disclose the Order in Item 7.2.1 of the Form.

45. However, while Greenway's contraventions may not have been intentional, on the facts of this case, they were serious.

46. In 2010 when the insider trading that gave rise to the Order occurred, Greenway was in his early 30s. The panel found at paragraph 44 of their decision that he "lacked the knowledge and sophistication necessary" to earn his living in public markets without getting into trouble. By the time of the contraventions in this case, Greenway was a lot more experienced. In fact, the Montego Circulars dated June 28, 2021 and May 1, 2023 say the following:

> Mr. Greenway brings more than two decades of experience in managing, financing and developing growth strategies for various TSX Venture Exchange- and Canadian Securities Exchange-listed companies, including involvement in acquisitions, business valuations and investor relations. *His key expertise lies in the management and development of junior public resource companies*,

> especially in the mining and oil and gas sectors. He has held directorships, senior management and business development positions, including his role as the chief executive officer of Stamper Oil & Gas Corp., Veritas Pharma Inc., Chief Consolidated Gold Mines, SNS Silver Corp., Moneta Resources Inc. and Sterling Mining Company, and his board position in Mountain View Conservation Centre. Mr. Greenway attended University in Bournemouth, England, where he studied accounting and finance. [emphasis added]

47. Greenway knew from his previous sanction in 2012 that serious consequences can arise from a failure to know the rules, and that ignorance of the law is not an excuse. Despite this knowledge, Greenway's evidence was that he simply reviewed the drafts the companies' lawyers sent him. Greenway's conduct demonstrates a serious lack of diligence falling below what is expected of a public company director and officer – especially an experienced one who had been disciplined for a past contravention based on lack of knowledge.

48. I also note that two of the Circulars contained disclosure that should have caused Greenway to inquire whether disclosure of the Order was required:

    (a) The Quantum Battery Metals Circular contained disclosure that another proposed director had been the subject of a Commission temporary order.

    (b) The October 20, 2021 Ultra Brands Circular contained disclosure that one of the proposed directors had been subject to cease trade orders.

    These were obvious warning signs that disclosure of the Order might have been required, which should have caused Greenway to ask the companies' professional advisors whether the Order needed to be disclosed. There is no indication that he did.

Mitigating Factors

49. I agree with staff that there are no significant mitigating factors in this case.

The Need to Demonstrate Consequences for, and Deter, Inappropriate Conduct

50. I agree with staff that these two factors can be considered together. I further agree with staff that a penalty is needed to encourage Greenway to exercise appropriate diligence to learn and comply with the law. Further, there is a need to demonstrate to the market that there will be consequences for non-disclosure of past sanctions, and for failing to exercise diligence to understand disclosure obligations.

Past Orders in Similar Circumstances

51. Staff referred me to the sanction decision in the Dunn matter referred to above: Dunn, 2023 BCSECCOM 251. Dunn was found to have breached the terms of a previous settlement for an illegal distribution. He also authorized, permitted or acquiesced in his company's failure to disclose his past settlement in a crowdfunding offering document.

Dunn was ordered to pay an administrative penalty of $60,000. He was also ordered to cease trading in securities and participating in a broad range of market activities for seven years. His company was ordered to pay a $10,000 administrative penalty for failing to disclose Dunn's past sanction.

52. Dunn's conduct was at the higher end of the range of seriousness. He was a former registrant, he started breaching the settlement terms almost immediately, he hid his ongoing involvement in his company, and his failure to disclose the settlement in the offering document was held not to be an innocent mistake. The repeated breaches in a number of areas of misconduct in violation of the settlement led the panel to conclude he was at risk of future breaches. In contrast, Greenway did not breach the Order and he did not know that disclosure of the Order was required. On the other hand, Dunn only omitted his past sanction once versus Greenway's seven omissions, and Dunn remedied any harm by offering all relevant investors their money back.

53. Given all the differences between Dunn and Greenway's conduct, I agree with staff that the most helpful guidance for this case comes from the $10,000 penalty Dunn's company was ordered to pay for omitting Dunn's regulatory history. Greenway's sanctions should be higher than that given that there were seven contraventions.

54. Staff submitted that it would be in the public interest to require Greenway to pay an administrative penalty in the range of $30-40,000, but that was based on ten contraventions including three that involved false statements, versus the seven contraventions by omission I have found. Taking into account all of the above factors, including Greenway's past $19,177 penalty and the panel's comments in *Dunn* about the materiality of past sanction disclosures, I find that the right penalty amount is $25,000.

Requirement to Pay or Dispute the Administrative Penalty

55. Under section 162.01 of the Act, and subject to Greenway's right to dispute the alleged contraventions or penalty amount under section 162.04 of the Act, I consider it in the public interest to require Greenway to pay an administrative penalty of $25,000 for the alleged contraventions.

56. Under section 162.04(1) of the Act, by April 11, 2025, Greenway must:
    - pay the administrative penalty; or
    - give me written notice requesting an opportunity to be heard to dispute the alleged contraventions or the amount of the administrative penalty.

57. Under section 162.04(2.1) of the Act, Greenway will be deemed to have contravened sections 9.1(2)(a) and 9.3 of NI 51-102 and Item 7.2.1 of the Form, and the administrative penalty set out in this notice will be payable to the commission, if Greenway:
    - pays the administrative penalty; or
    - fails to pay the full amount of the administrative penalty, or request an opportunity to be heard to dispute the alleged contraventions or the amount of the administrative penalty, by April 11, 2025.

February 28, 2025

Peter J. Brady
Executive Director