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To: [Member Regulation Policy](#)
Cc: TradingandMarkets@osc.gov.on.ca; [CIRO-Reporting](#)
Subject: Support for Proposed Incorporated Approved Person Compensation Option (CIRO Bulletin 26-0150)
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Attachments: [image.png](#)

[EXTERNAL EMAIL / COURRIEL EXTERNE]

To Whom It May Concern,

I am writing as a financial advisor with CI Assante Wealth Management to express my support for the letter CI Wealth submitted on CIRO's proposed rule amendments relating to the adoption of an Incorporated Approved Person compensation option.

The proposal represents an important modernization of the Canadian wealth management industry. Advisors today operate sophisticated businesses that often provide comprehensive financial planning, retirement planning, insurance, estate planning, and wealth management services to Canadian families and businesses. The proposed framework better reflects the realities of how advisory practices operate while maintaining appropriate regulatory oversight and investor protection.

I believe the proposed incorporated advisor model will create greater consistency across registration categories and eliminate regulatory distinctions that currently result in different outcomes for advisors performing substantially similar functions. This harmonization will support a more efficient and competitive wealth management industry.

The ability to operate through an incorporated structure will also provide advisors with greater flexibility to invest in their businesses, support succession planning, recruit and develop future advisors, and enhance the long-term sustainability of advisory practices. These benefits can ultimately improve access to professional financial advice for Canadian investors.

I encourage CIRO to support allowing advisors to utilize holding companies and family trusts, providing greater flexibility for tax, estate and succession planning. Many Advisors already have these structures in place and accommodating them would help avoid unnecessary restructuring, potential adverse tax consequences, and additional costs.

Importantly, I support the continuation of appropriate investor protection safeguards and dealer supervision requirements. The proposed framework preserves the principle

that advisors remain accountable for their conduct while allowing greater business flexibility.

I encourage CIRO to move forward with the proposal and implement a practical transition process that allows existing advisors to adopt the new framework efficiently and with minimal administrative burden.

Thank you for the opportunity to provide my comments and support for this important initiative.

Sincerely,

Jake Geisler, CFP®

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