



**OFFICE OF THE ETHICS COMMISSIONER
PROVINCE OF ALBERTA**

Report

**of the Investigation
under the *Conflicts of Interest Act***

by

**Hon. Marguerite Trussler, Q.C.,
Ethics Commissioner**

into allegations involving

Minister Doug Schweitzer, MLA Calgary- Elbow

July 6, 2020

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Introduction

In a letter dated December 17, 2019, Duff Conacher, representing Democracy Watch, requested an investigation into the conduct of Minister of Justice and Solicitor General, Doug Schweitzer, in relation to his participation in the decision to appoint Jackson Stephens (Steve) Allan as an inquiry commissioner under the *Public Inquiries Act*. The letter specifically questioned whether the Minister had a conflict of interest under s. 2(1) and s.3 of the *Conflicts of Interest Act*.

Sometimes an event, on the face of it and on the basis of the allegations presented in the news and on social media, appears to observers to be malodorous and warrants an investigation. This situation is one such event.

However, often with the media and particularly social media, the truth is inconvenient and facts are of no interest at all. As a result, it is my legislated obligation to establish the truth and to determine if the established facts constitute a breach of the *Conflicts of Interest Act*.

Scope and Authority

As I have stated on previous occasions, it is important to understand the jurisdiction of the Ethics Commissioner. The Office of the Ethics Commissioner is created by the *Conflicts of Interest Act*, R.S.A. 2000, c.C-23. The Act sets out the obligations of Ministers and Members, as well as the parameters of the jurisdiction of the Ethics Commissioner. The Ethics Commissioner has no power beyond that given by the Act. Notwithstanding some broad-reaching philosophical provisions in the preamble to the Act, the scope of the Act is narrow, in that it only deals with the private interests of Members. The object of the Act is to make sure that no Member, Member's partner, child or other direct associate, as defined by the Act, obtains a personal financial or other benefit, as a result of being a Member, through such things as insider knowledge, influence or inappropriate gifts, to name a few examples. The Act also prevents Members from improperly benefitting other family members and friends. The Act does not deal with moral integrity.

The authority for conducting an investigation is found under part 5 of the Act. The appropriate sections are s. 24 and 25.

Relevant Legislation

The provisions of the Act that are relevant to this investigation are s. 2(1) and s. 3:

2(1) A Member breaches this Act if the Member takes part in a decision in the course of carrying out the Member's office or powers knowing that the decision might further a private interest of the Member, a person directly associated with the Member or the Member's minor or adult child.

3 A Member breaches this Act if the Member uses the Member's office or powers to influence or to seek to influence a decision to be made by or on behalf of the Crown to further a private interest of the Member, a person directly associated with the Member or the Member's minor child or to improperly further another person's private interest.

Private interest is defined in the negative in s. 1 (1)(g) of the Act:

Private interest does not include:

- (i) an interest in a matter
 - (A) that is of general application,
 - (B) that affects an individual as one of a broad class of the public,
or
 - (C) that concerns the remuneration and benefits of an individual;
- (ii) an interest that is trivial;
- (iii) an interest of an individual relating to publicly traded securities held in that individual's blind trust or in an investment arrangement.

The definition of 'direct associate' is set out in s. 1(5):

For the purpose of this Act, a person is directly associated with a Member if that person is

- (a) the Member's spouse or adult interdependent partner,

(b) a corporation having share capital and carrying on business or activities for profit or gain and the Member is a director or senior officer of the corporation,

(c) a private corporation carrying on business or activities for profit or gain and the Member owns or is the beneficial owner of shares of the corporation,

(d) a partnership

(i) of which the Member is a partner, or

(ii) of which one of the partners is a corporation directly associated with the Member by reason of clause (b) or (c),

or

(e) a person or group of persons acting with the express or implied consent of the Member.

Investigative Process

As part of the investigation I interviewed, under oath, the Honourable Doug Schweitzer and Steve Allan.

I also interviewed Grant Sprague, Deputy Minister of Energy, Jay O'Neill, Executive Director, Market Access Branch, Energy, Frank Bosscha, Deputy Minister of Justice and Solicitor General, and Craig Bellefontaine, Chief of Staff to Minister Schweitzer.

I requested documents pursuant to s. 25(5) of the Act from Executive Council, the Department of Energy, Doug Schweitzer and Steve Allan.

I received co-operation from all parties throughout and received the requested relevant documents.

Facts

Doug Schweitzer was first briefly introduced to Steve Allan when he was an articling student. Many years later, when the Minister was a partner at Dentons law firm in Calgary, Steve Allan had offices in excess space that Dentons had leased. Steve Allan was a very good friend of one the partners of Dentons, Quincy Smith, who offered him the space. At that point, Steve

Allan was chair of Calgary Economic Development and was in need of office space. His home had been destroyed in the Calgary flood of 2013 and there was no place to work in the small condo where he and his wife were residing while their house was being rebuilt. He was an accountant by background and had forensic accounting experience. His firm had joined Ernst and Young and he left that firm in 2013. Mr. Allan did not pay rent for his office space at Dentons. Dentons provided the space and parking as a contribution to Calgary Economic Development.

It was around this time that Doug Schweitzer joined Dentons. He and Mr. Allan saw each other in the hallway from time to time. On a couple of occasions, they had a lengthy discussion. On one occasion, they had lunch. Doug Schweitzer invited Steve Allan to several conservative party events but it does not appear that the invitations were accepted. The emails exchanged between them numbered in the single digits.

Their conversations were mainly about economic strategy and flood mitigation.

They were not social friends. There was a generation between them. Steve Allan was not a member of any of the various conservative parties. In fact, his records show that at times he financially also supported the Liberals, the NDP and the Alberta Party. His contributions were modest, with the largest being \$1250. He made a \$1000 donation for Doug Schweitzer's United Conservative Party leadership campaign, nothing for his nomination quest and \$50 in January of 2019 to the Calgary-Elbow constituency association.

Steve Allan was considered to be a community leader in Calgary and was interested in a number of worthy projects.

Steve Allan's son, Toby, was a partner at Dentons, based in the Calgary office, from 2009 to early 2020. There were about 100 lawyers in the Dentons Calgary office and he practised in a different area than Doug Schweitzer did. Doug Schweitzer did not interact with him regularly.

When Doug Schweitzer decided to run as leader of the newly formed United Conservative Party, Steve Allan was approached to support him. Steve Allan made it quite clear that he would not do so unless Doug Schweitzer supported flood mitigation, which, under the circumstances, was understandable. He supported Doug Schweitzer for leader because he was socially progressive. He made a donation of \$1000 to his leadership

campaign and he, along with two others, hosted a reception for Doug Schweitzer at the Calgary Golf and Country Club. The bill for the reception was \$ 1,244.26 in total, of which Steve Allan paid his share of \$414. He also invited Doug Schweitzer to his home, along with a number of his neighbours, so that Doug Schweitzer could explain his position on flood mitigation. He was not active in Mr. Schweitzer's campaign when the general election was held in April of 2019.

Doug Schweitzer resigned from Dentons when he was elected as a Member of the Legislative Assembly. The resignation took place around April 28 or 29, 2019. His relationship was fully severed. He owed no further obligation to Dentons and vice versa. He was sworn in as Minister of Justice and Solicitor General on April 30, 2019.

One of the campaign promises of the United Conservative Party was to hold an inquiry into foreign money supporting opposition to the Alberta oil and gas industry. Doug Schweitzer did not participate in the development of this item for the campaign.

The *Public Inquiries Act*, RSA 2000, c. P-39 is not often used in Alberta. Given that there was a learning curve in setting one up, it was assigned to Justice to initiate and it was Minister Schweitzer who was tasked to provide the framework and get all necessary approvals. The Minister of Justice and Solicitor General is responsible for the *Public Inquiries Act* by virtue of s. 14 of the *Designation and Transfer of Responsibility Regulation*, AR 44/2019.

After discussions with the Premier and his Department, Minister Schweitzer took the matter to the Resource Development Action Ministerial Task Force for discussion and approval on May 31, 2019.

With respect to who should lead the inquiry, a wide variety of suggestions were put forward: a sitting judge, a retired judge, a senior lawyer and a business leader. The task force decided that it wanted someone with a forensic accounting background. It was also thought that the person should be non-partisan, a community leader and not overly tied to the oil and gas industry. The Minister was requested to return to the task force in two weeks with further recommendations as to an inquiry commissioner. The goal was to announce the inquiry prior to the Stampede Parade in July.

Given the requirements, the list of prospective candidates narrowed dramatically. There is not a surplus of forensic accountants in Alberta and

the majority are with large accounting firms and have hourly rates that were not compatible with the proposed budget for the inquiry.

Minister Schweitzer's staff looked, without success, into the possibility of finding someone in the oil and gas industry. As Steve Allan had emailed the Minister several times and chatted with him at least once after the election, pressing for action on flood mitigation and economic development for Calgary, it is no surprise that Mr. Allan's name came to mind for the inquiry. As an aside, there was no suggestion that the Minister owed anything to Mr. Allan. The emails were of the type that interested members of the public send to politicians all the time.

The Minister asked his staff to investigate if Steve Allan would be suitable and also conferred with the Premier.

Steve Allan met all the requirements for the position. He was an experienced forensic accountant, he had a high and reputable profile in Calgary as chair of Calgary Economic Development and for community work, and was reasonably non-partisan as he has supported all major political parties in the past. [See Appendix A – biographies of Steve Allan.]

A decision was made in collaboration with the Premier's office to take Steve Allan's name forward. He was available and agreed to the same compensation as that of a provincial court judge.

The Minister first contacted Steve Allan by telephone the evening of June 2, 2019 to find out if he would be available. The Minister explained about the inquiry and asked Steve Allan if he would be interested. Mr. Allan's term as chair of Calgary Economic Development was almost finished and he was looking for something to occupy his time. He indicated an interest.

A further telephone discussion took place on June 4, 2019 between the Minister and Steve Allan. It was during that call that Minister Schweitzer indicated that the inquiry commissioner would be able to hire his own legal counsel and advisors but that details would need to be worked out with Justice Ministry officials. At some point, Steve Allan had indicated that he would want to hire his own advisors if he took on the position. The majority of the call was to gauge Mr. Allan's interest and to outline what the inquiry would entail.

Most of the June 4th call centred on scheduling a meeting to talk about the purpose of the inquiry.

The meeting was eventually held in Edmonton on June 10th. It was held at the office of the Deputy Minister of Justice. Several Department officials were present. The Minister was not present but his chief of staff, Craig Bellefontaine, was present for some of the meeting. It was at this meeting that Steve Allan indicated that he wanted David Mann, who is a lawyer at Dentons in Calgary, as counsel for the inquiry, although the discussion of counsel was only a couple of minutes. Mr. Allan indicated that he wanted to retain Dentons, as he wanted counsel he knew and was comfortable with. Being able to choose counsel was important to him. None of the Justice Department officials, including the Minister's chief of staff, knew that Steve Allan's son was a partner at Dentons at that time.

There was considerable further follow-up with legal counsel from Justice, as the Department was tasked with preparing a service agreement to support the public inquiry.

On June 19, 2019, the matter was back on the agenda of the Resource Development Action Ministerial Task Force. The Task Force recommended that cabinet approve the proposal to establish the Foreign Funding Inquiry and announce it prior to July 5, 2019. This recommendation included supporting the proposed nominee, Steve Allan, confirming that the Minister of Justice and Solicitor General was empowered to finalize a service agreement to come into force once the Commissioner was appointed by order in council and confirming that work could continue on developing the terms of reference of the inquiry.

Another meeting was held by video conference on June 24, 2019. Steve Allan called from Dentons in Calgary and lawyers from Dentons were in attendance. The Minister also attended the meeting at Dentons in Calgary, as he was in Calgary at that time, while Department officials were in Edmonton. The purpose of the meeting appears to have been to firm up the terms of reference. Mr. Allan appears to have already decided that he would retain Dentons by that time.

On July 2, 2019, cabinet approved an order in council to set up the public inquiry and appoint Jackson Stephens Allan as the commissioner.

The public inquiry was announced on July 3, 2019 in Calgary.

Steve Allan entered into an engagement agreement with the Province on July 8, 2019. [See Appendix B.] The signatory on behalf of the Province is the Minister of Energy, as represented by the Deputy Minister of Energy.

Findings

Minister Schweitzer's own private interest is not in issue in this investigation, nor is the private interest of his children or any of his direct associates as defined in the Act. Mr. Allan does not meet the definition of a 'direct associate' of the Minister in the Act. Neither the Minister, his children, nor his direct associates had any personal or particular interest in, or anything to gain from, the appointment of Mr. Allan as inquiry commissioner. Setting up the inquiry was simply part of the Minister's official duties. Just because Mr. Allan made political donations to Minister Schweitzer in the past does not make the subsequent appointment of Mr. Allan as inquiry commissioner a private interest for the Minister. I find that Minister Schweitzer did not take part in a decision knowing that the decision might further his private interest or that of his direct associates or children. In my view, Minister Schweitzer did not breach s.2 of the *Conflicts of Interest Act*.

On the other hand, it is clear that Mr. Allan had a private interest in being appointed as inquiry commissioner. It was a high-profile appointment that entailed remuneration. The question, therefore, is whether Minister Schweitzer breached s.3 of the Act by using his office or powers to influence or seek to influence a decision to be made by or on behalf of the Crown to improperly further Mr. Allan's private interest. Since Minister Schweitzer, in his capacity as Minister of Justice and Solicitor General, participated in the recommendation to cabinet that Mr. Allan be appointed as inquiry commissioner, I find that he did use his office and powers to influence a decision to be made by or on behalf of the Crown that would further Mr. Allan's private interest. The remaining issue is whether the Minister did so to "improperly" further that interest.

In my March 11, 2020 investigation report into allegations involving Member Shane Getson ("Getson Report"), I set out the five factors to be considered when determining whether the actions of a Member were to "improperly" further another person's private interest. Those factors apply in this investigation as well.

1. Relationship between the Member and the other person

The first factor to consider is the relationship between Minister Schweitzer and Mr. Allan, particularly whether the nature of the relationship is such that it might suggest preferential treatment. In my review, the relationship between Minister Schweitzer and Mr. Allan does not weigh in favour of a finding of impropriety in this investigation. They were simply acquaintances in Calgary who occasionally communicated about issues such as economic strategy and flood mitigation. They were not friends and their relationship was not close. Further, as I stated in the Getson Report, a political donation (such as the one that the Minister received from Mr. Allan for his leadership campaign) does not lead to a finding of impropriety, as long as that donation does not exceed legislated limits.

The Minister's relationship with Mr. Allan's son, Toby, also does not weigh in favour of a finding of impropriety. Although they both worked at the Calgary office of Dentons, they were not friends, practised in different areas, and did not interact with each other often.

2. Degree of the Member's involvement in the decision or the process leading to it

Regarding the second factor, I find that the extent of Minister Schweitzer's involvement in the decision to appoint Mr. Allan as inquiry commissioner does not weigh in favour of a finding of impropriety. Although he proposed Mr. Allan as the candidate and took part in some meetings leading up to the appointment and the establishment of the inquiry, he did so because it was his official duty as Minister of Justice and Solicitor General to set up the inquiry. As previously noted, the Minister of Justice and Solicitor General is responsible for the *Public Inquiries Act* pursuant to s.14 of the *Designation and Transfer of Responsibility Regulation*, AR 44/2019. The Minister's participation was at a high-level and the details of arranging the appointment and the inquiry were left to Department of Justice staff.

3. Whether the Member acted for an improper purpose

With respect to the third factor, I find that Minister Schweitzer did not act for an improper purpose when he recommended that Mr. Allan be appointed as inquiry commissioner. He was tasked with recommending a suitable candidate for the position and he was genuinely of the view that Mr. Allan was highly qualified in that regard. Minister Schweitzer did not owe Mr. Allan anything and there is nothing to suggest that he acted for the purpose of giving Mr. Allan preferential treatment or because Mr. Allan made political donations to him in the past.

While the Minister knew in passing that Mr. Allan wanted to appoint Dentons in Calgary as legal counsel for the inquiry, he appropriately followed the convention that inquiry commissioners are independent and entitled to choose their own counsel and so did not intervene. It also should be noted that Dentons appears to have been engaged before the Minister was aware of the firm's involvement. In any event, at that point, the Minister had no financial interest in Dentons or relationship with the law firm and therefore the potential engagement of Dentons as counsel for the inquiry was of no importance to his obligations under the *Conflicts of Interest Act*.

4. The process used for the decision

The fourth factor to be considered is the process used by the Minister to arrive at the decision to recommend Mr. Allan for appointment as inquiry commissioner. On one hand, a fair, open and transparent process or one that adheres to the applicable standard rules, policies and processes would weigh against a finding of impropriety (see e.g. The Ford (Ontario, March 2019); The Philpott Report (Canada, December 2016); The Clement Report (Canada, July 2012)). On the other hand, a process based on preferential treatment or that departs from the usual applicable rules, policies and processes would weigh in favour of a finding of impropriety (see e.g. The Paradis 1 Report (Canada, March 2012); The Finley Report (Canada, March 2015)), as generally would a process that clearly lacks rigor or is flawed (see e.g. The Finley Report (Canada, March 2015)).

As previously mentioned, the *Public Inquiries Act* has not been used frequently in Alberta. There was a learning curve in setting the inquiry up in this case and no established rules, policies or processes for selecting an inquiry commissioner. That being said, I find that the process for the appointment of Mr. Allan that was followed in this case was not based on preferential treatment or clearly flawed. It does not weigh in favour of a finding of impropriety.

The Minister of Justice and Solicitor General is responsible for the *Public Inquiries Act* pursuant to s.14 of the *Designation and Transfer of Responsibility Regulation*, AR 44/2019. It was for that reason that establishing the inquiry and recommending a commissioner was within Minister Schweitzer's purview. There is nothing to suggest that the process undertaken by the Minister to complete these tasks was inappropriate in the circumstances. Minister Schweitzer took the matter to the Resource Development Action Ministerial Task Force on two occasions for discussion and approval. The committee considered the requirements necessary for the position and approved Mr. Allan's name for recommendation to cabinet. The Minister's staff also had looked into the possibility of other candidates and whether Mr. Allan would be a viable candidate. Collaboration with the Premier's office also took place. Development of the terms of reference and service agreement for the inquiry was left to legal counsel from the Department of Justice.

5. Whether there was an objective basis for the decision

The inquiry commissioner position required a candidate with a forensic accounting background and who was non-partisan, a community leader and not overly tied to the oil and gas industry. These requirements significantly narrowed the list of potential candidates and there was a short timeline for establishing the inquiry. As an experienced forensic accountant, a community leader in Calgary, and somebody who had supported a range of political parties in the past, Mr. Allan met all of the requirements. Mr. Allan was available for the role and agreed to take it on for compensation that fit within the proposed budget for the inquiry.

For these reasons, I find that there was an objective basis for the decision to recommend Mr. Allan as inquiry commissioner. This factor weighs against a finding of impropriety.

Conclusion

As a result of my findings set out above, I find that Minister Schweitzer did not breach the *Conflicts of Interest Act* in relation to his participation in the decision to appoint Steve Allan as public inquiry commissioner.

It is important to note that a public inquiry commissioner under the *Public Inquiries Act* is independent. Once the terms of reference are settled and the order in council is passed by cabinet, the Government has no jurisdiction over, and cannot instruct or give guidance to, the public inquiry commissioner. It is standard practice for a public inquiry commissioner to engage their own legal counsel and advisors.

I have no jurisdiction with respect to Steve Allan. It does stretch credibility that Mr. Allan did not consider whether or not there may possibly be a conflict of interest in his engaging of Dentons as counsel for the inquiry, given that, for all intents and purposes, the firm gave him free office space and both his close friend (although that alone is not significant) and his son were partners at the firm.



Hon. Marguerite Trussler, Q.C.
Ethics Commissioner

Appendix A

STEVE ALLAN Curriculum Vitae

Steve Allan has been a Chartered Accountant (now CPA) for more than 45 years with experience in corporate restructuring, bankruptcies, receiverships, complex corporate litigation matters, and corporate governance.

He was involved in some of the most high profile and complex files in Alberta, including Abacus Cities Ltd, the Principal Group Ltd, Bre-X, and Canadian Pacific Airlines. As well, he assisted numerous small and medium sized businesses and their stakeholders through the insolvency and restructuring process. His practice also focused on investigative accounting and he was qualified as an expert witness in criminal and civil matters in courts and tribunals in Alberta and Ontario. He was listed as one of Canada's top 20 expert witnesses by LEXPERT magazine in 2005.

Steve also assisted many community organizations in financial difficulty over the years. Of particular note was his pro bono service in the restructuring of the Calgary Stampeder Football Club in 1986 and the Calgary Philharmonic Orchestra in 2003.

Steve was an active member of numerous professional organizations throughout his career including the Canadian Association of Insolvency and Restructuring Professionals, the Insolvency Institute of Canada, the Institute of Management Consultants of Alberta, and the Turnaround Management Association. He was active throughout his career with the Institute of Chartered Accountants of Alberta (now CPA Alberta) and served as President of the ICAA in 1992-93. He served as a director of the Chartered Accountants Education Foundation and volunteered in various roles with the ICAA throughout his career. He continues to volunteer for CPA Alberta.

Steve is now retired from the practice of restructuring and investigative/litigation accounting and spends his time and energy in corporate governance, with an emphasis on not for profit organizations. Throughout his career Steve was active in a volunteer leadership role with many community organizations, that included the Calgary Exhibition and Stampede (Past President), the Calgary Stampede Foundation (Past Chair), Rotary International (Past President Rotary Club of Calgary and Past District Governor), the University of Calgary (Board of Governors, Director of McMahon Stadium Society and University Technologies Inc), the Calgary Zoological Society (Past Trustee and Member of Executive Committee), and the Calgary Foundation (Past Director). He is currently the volunteer Chair of the Boards of Calgary Economic Development, and McMahon Stadium Society.

He was appointed by the Mayor to serve as volunteer Co-Chair of the Calgary Poverty Reduction Initiative (CPRI-a joint initiative of the City of Calgary and the United Way of Calgary). The recommendations of the CPRI report, "Enough For All" were approved by the United Way and the City of Calgary and are in the process of being implemented by Vibrant Communities Calgary.

Steve was also appointed by the Mayor in 2012 as volunteer Chair of the Project Advisory Committee for the Refresh of Calgary's Economic Strategy. The refreshed strategy, "Building On Our Energy" was approved by City Council in December of 2014. The Strategy was refreshed again in 2018 and is now called Calgary in the New Economy. Calgary Economic Development has been charged by City Council to implement the Strategy, and Steve co-chairs the Leadership Implementation Team for the Strategy, reporting to the Priorities and Finance Committee of the City.

Steve was selected by the Government of Canada in February 2008 to take on the chairmanship of the Board of Directors of the Canadian Tourism Commission (CTC- now Destination Canada).

As the Chairman of the CTC, Canada's national tourism marketing organization, he was responsible for guiding the governance of the organization and became an expert and advocate for the Canadian tourism industry. He led the CTC at major international travel marketplace events, building valuable relationships and gathering critical knowledge in support of Canada's tourism industry.

Steve served as a Director and Chair of the Audit, Finance and Risk Committee for Compton Petroleum Corporation and was Chair of the Independent Review Committee for Citadel Group of Funds.

He currently serves as Vice Chair of Neyaskweyahk Trust Fund, the beneficiary of which is the Ermineskin Cree Nation. He is also an independent director of three Private Companies and is on the Executive Organizing Committee of the Top 7 Over 70 Awards and is a Director of the related InterGen Canada. These organizations are focused on creating opportunities for retired business and professional people to mentor entrepreneurs.

Steve also currently serves on the City of Calgary's Event Centre Assessment Committee and the Foothills Park Redevelopment Advisory Committee.

Professional Experience

Price Waterhouse & Co. 1967-1971 (Staff Accountant)

- Price Waterhouse Management Consultants 1971 to 1975 (Senior Consultant)
- Left PW & Co. in 1975 upon his fathers' death to assume control of his general accounting, audit and tax practice; in 1976 merged this practice with Collins Barrow, Chartered Accountants

Collins Barrow, Chartered Accountants (Calgary) 1976-1991

- Partner in charge of Special Services (incorporating the firms' practice of insolvency, management consulting, business valuations, litigation support services)
- Chairman, Collins Barrow Limited (Trustees, Receivers and Liquidators)
- Chairman, National Insolvency Committee for Collins Barrow, 1987-1988
- Member, Collins Barrow (Calgary) Management Committee, 1979-1991
- Left Collins Barrow to assume the position of Insolvency Practice Director at Ernst & Young, a position left vacant due to the serious illness of the incumbent.

Ernst & Young Inc.

- Senior Vice President
- Partner
- Practice Director
- Corporate Recovery and Insolvency Practice
- Forensic and Litigation Accounting Group

Member — Ernst & Young National Insolvency Practice Committee 1991-1995

In 1996 established the firm Allan & Taylor Inc. with a focus on corporate insolvency and forensic and litigation accounting. Merged with Richter, Usher & Vineberg in January 1, 2001 and name changed to Richter, Allan & Taylor Inc.; name subsequently changed in 2004 to RSM Richter Inc. In December 2011,

RSM Richter merged with Ernst & Young and Steve was a Senior Advisor with Ernst & Young until April, 2013.

Academic Qualifications and Professional Designations

Degrees and Designations

- B. Comm — University of Calgary, 1967
- Chartered Accountant (CA), 1969
- Trustee in Bankruptcy, 1979
- Canadian Association of Insolvency and Restructuring Professionals (CIRP), and predecessor organizations, 1982
- Institute of Corporate Directors (ICD.D), 2006

Memberships and professional organizations

- Member and Past President, Institute of Chartered Accountants of Alberta (CPA Alberta)
- Past Member, Insolvency Institute of Canada (by invitation)
- Past Member Canadian Association of Insolvency and Restructuring Professionals
- Past Member, Association of Certified Fraud Examiners
- Past Member and Director, Alberta Insolvency Practitioners Association
- Past Member and Director, Institute of Management Consultants of Alberta
- Member, Institute of Corporate Directors

Professional Offices

- President, Institute of Chartered Accountants of Alberta (ICAA), 1992-1993
- Member Governing Council ICAA, 1987-1993
- Governor, Canadian Institute of Chartered Accountants, (CICA) 1992-1993
- Governor, Chartered Accountants Education Foundation, 1993-96
- Member, ICAA Complaints Inquiry Committee, 2002 — 2005
- Member Achievement Awards Review Committee ICAA/CPA Alberta 2013-present
- Appointed as Investigator and Chair/ Member of various tribunals relating to professional conduct complaints-ongoing
- Honorary Chair, Pay It Forward Campaign for financial literacy education for Alberta students 2010-2012

Other Directorships; Public Company and Crown Corporation Appointments

- Director and Chairman of the Audit, Finance and Risk Committee, Compton Petroleum Corporation, 2007 — 2011
- Chairman, Citadel Group of Funds - Independent Review Committee, 2007 - 2009
- Chair of the Board, Canadian Tourism Commission, 2008 - 2014
- Trustee and Vice Chair, Neyaskweyahk Trust Fund, for the Ermineskin Cree Nation, 2011 present
- Director, several private limited partnerships.

Community Activities

- Vice Chair, The McMahon Stadium Society, 2007-2012
- Chair, The McMahon Stadium Society, 2012-present
- Director and Vice-Chair, Calgary Stampede Foundation, 2007 — 2015
- Chair, Calgary Stampede Foundation, 2015-2017

- Director, Calgary Exhibition and Stampede, 1994 — 2009
- Chairman of the Board and President, Calgary Exhibition & Stampede, 2005-2007
- Director, Saddledome Foundation, 2007 - 2009
- Member, Calgary Committee to End Homelessness and Co-Chair Communications and Outreach Sub-Committee, 2007 — 2008
- Director, The Calgary Foundation, 1997 — 2006
- Director, University Technologies Inc., 2003 — 2009
- Chairman, Rideau-Roxboro Community Traffic Committee, 2000 — 2009
- President, Whitefish Lake Lodge Home Owners Association. 2012-2018
- Member and Past President, the Rotary Club of Calgary
- Member and Volunteer Mentor, Rotary Stay-in-School Awards Committee, 1994 — Present
- Member of the Steering Committee for the Rotary Tom Jackson Aboriginal Stay-in-School program, 2011- present
- District Governor, Rotary International District 5360, 2009-2010
- Past President, Calgary Golf & Country Club
- Co-Chair, Calgary Poverty Reduction Initiative, 2011 — 2015
- Chair, Project Advisory Committee for Refreshing Calgary's Economic Strategy 2013-2015
- Chair, Leadership Implementation Committee, Calgary's Economic Strategy 2015-present
- Chair, Calgary Economic Development, 2014-present
- Executive Committee, Top 7 Over70 Awards Committee, 2017-present
- Director InterGen Canada, 2018-present
- Member, City of Calgary Event Centre Assessment Committee, 2018-present
- Member, City of Calgary Foothills Park Redevelopment Committee, 2019

Awards and Honors

- Inducted into the Alberta Order of Excellence, 2017
- Fellow of the Institute of Chartered Accountants of Alberta (FCA), 1992
- Life Member of the Institute of Chartered Accountants of Alberta, 1993
- ICAA Distinguished Service Award, 2004
- Recipient, Lifetime Achievement Award, Institute of Chartered Accountants of Alberta, 2008
- Paul Harris Fellow (Rotary Club), 1996
- Presented with Honorary Chieftainship (Rides Many Horses) by the Five Tribes of the Treaty Seven Nations of Indian Village, Stampede Park, 2005
- Presented with Distinguished Service Medallion by General Rick Hillier, Chief of Defense Staff, Canadian Armed Forces, 2006, for enabling an enhanced relationship between the Canadian Forces and the Stampede and being an advocate for the men and women of the Canadian Forces
- Fellow, Calgary Golf & Country Club, 2006
- Named, along with Vern Kimball and George Brookman, as "Business Persons of the Year (2006)" by Calgary Inc. Magazine
- Citizen of the Year, City of Calgary Awards, 2006
- Honorable Mention, Turnaround Management Association (North America) — Pro Bono Turnaround of the Year (re Calgary Philharmonic Orchestra), 2003
- Award of Distinction, National Post Award for Business in the Arts (re Calgary Philharmonic Orchestra), 2003
- Listed as one of the Top 20 Expert Witnesses in Canada by LEXPERT Magazine, Oct 2005

- Recipient, Alberta Centennial Medal, 2005
- Recipient, Queen's Diamond Jubilee Medal, 2012
- Presented with "Heart of Calgary Award" by Volunteer Calgary in 2008 for lifetime volunteer contributions to the community
- Calgary Board of Education, Distinguished Alumni of the Year Award, 2009
- Named by Alberta Venture Magazine as one of Alberta's 50 Most Influential People, 2010
- Recipient of the CPA Education Foundation Impact Award, 2013

Steve Allan

Steve is a Fellow of the Chartered Professional Accountants of Alberta. He practiced in the area of corporate restructuring, insolvency and forensic accounting and throughout his career was involved in some of the most high profile and complex files in Alberta. He is a graduate of the University of Calgary with a B.Comm degree and holds the ICD.D designation with the Institute of Corporate Directors.

Steve is Chair of Calgary Economic Development and the McMahon Stadium Society, and Board Vice-Chair of the Opportunity Calgary Investment Fund and Neyaskweyahk Trust of the Ermineskin Cree Nation. Steve served as Chair of the Canadian Tourism Commission (now known as Destination Canada) for seven years and he recently completed a five year term as Governor of the University of Calgary. He also served as Co-Chair of the Calgary Poverty Reduction Initiative and chaired the Committee to Refresh Calgary's Economic Strategy.

Steve is currently serving on the City of Calgary's Event Centre Assessment Committee and the Foothills Athletic Park Redevelopment Advisory Committee.

Steve served as a Director of Compton Petroleum Corp. and chaired Compton's Audit Committee. He also served as the Chair of the Independent Review Committee of Citadel Group of Funds. He currently serves as a Director of three Limited Partnerships, two involving real estate development and one focused on distress business opportunities. Steve is one of the founders of the Top 7 Over 70 Awards program, and serves on the board of the successor organization, InterGen Canada, dedicated to creating opportunities for retired business people to mentor entrepreneurs.

He is Past President of the Institute of Chartered Accountants of Alberta and has volunteered for the Institute (now CPA Alberta) throughout his career.

Steve has been a committed member of the Rotary Club of Calgary Downtown since 1980 and served as Club President in 1994-95. He served as Governor of Rotary District #5360 in 2009-10. He remains active with Rotary as a mentor in the club's Stay in School program and is one of the stewards of the Rotary Tom Jackson Stay in School program, focused on First Nations students.

Steve has served as Trustee of the Calgary Zoological Society, a Director of the Calgary Foundation, a Director of University Technologies Inc., and was a member of the Committee to End Homelessness in Calgary.

Steve has been a volunteer of the Calgary Exhibition and Stampede since 1974 and served as Chairman of the Board and President of the Stampede from 2005-2007. He also recently stepped down as Chair of the Calgary Stampede Foundation after fulfilling a ten year term on that Board.

Steve was inducted into the Alberta Order of Excellence in October 2017. He was recognized as Calgary's 'Citizen of the Year' for 2006. He also was recognized with the Lifetime Achievement Award by the Institute of Chartered Accountants and was named Distinguished Alumni of the Year by the Calgary Board of Education in 2009. He is very proud to be an Honorary Treaty Seven Chief, "Rides Many Horses".

A former marathoner, Steve still enjoys running, fitness, skiing, cycling and golf.

ENGAGEMENT AGREEMENT

(this "Agreement")

THIS AGREEMENT IS MADE EFFECTIVE AS OF THE 2nd DAY OF JULY, 2019.

BETWEEN:

**Her Majesty the Queen in right of Alberta as represented by the
Minister of ENERGY
(the "Minister")**

- and -

**JACKSON STEPHENS ALLAN
(the "Commissioner")**

**AGREEMENT RELATING TO THE CONDUCT OF AN INQUIRY
UNDER THE *PUBLIC INQUIRIES ACT***

RECITALS

1. By Commission (attached as Appendix A), the Lieutenant Governor in Council has:
 - a) directed that a public inquiry be held to inquire into anti-Alberta energy campaigns that are supported, in whole or in part, by foreign organizations (the "Inquiry") and,
 - b) appointed Jackson Stephens Allan as the Commissioner to conduct the Inquiry.
2. The Minister and the Commissioner wish to enter into this Agreement regarding the terms of the Commissioner's engagement to conduct the Inquiry.

THEREFORE the parties agree as follows:

1. Term of this Agreement

- 1.1 The term of this Agreement is from July 2, 2019 and will continue until the end of the day on July 2, 2020 (the "Term"), unless terminated earlier in accordance with this Agreement.

2. Conduct

- 2.1 The Commissioner agrees to devote his full attention to the performance of the duties required to fulfill his obligations to conduct the Inquiry in accordance with the Terms of Reference referred to in the Commission in Appendix A. The Commissioner will not be involved in any appointment, business or undertaking or employment other than his engagement under this Agreement ("Concurrent Engagement") except with the prior written approval of the Minister. The Minister, in her sole discretion, reserves the right to revoke approval for Concurrent Engagement.
- 2.2 The Commissioner agrees to review and comply with the *Code of Conduct and Ethics for the Public Service of Alberta*, and supplemental codes of conduct and policies and rules

of the Minister respecting the performance and the conduct of employees generally as if he were an employee in the public service.

2.3 The Commissioner will act with independence and impartiality in the conduct of the Inquiry and the preparation of the Report.

3. Responsibilities of the Commissioner

In the conduct of the Inquiry

3.1 The Commissioner shall:

- a) prepare an interim report on the work related to the Inquiry and submit the report to the Minister no later than January 31, 2020;
- b) prepare and deliver a final report (the "Report") setting out the findings and recommendations of the Commissioner and submit the Report to the Minister no later than July 2, 2020 in accordance with the *Public Inquiries Act*; and
- c) fulfill all duties and obligations as described in the Terms of Reference for the Inquiry referred to in the Commission in Appendix A.

4. Financial Controls

4.1 The Commissioner will submit to the Minister for her approval a budget (the "Budget") for making the Inquiry prior to July 31, 2019. The Minister has approved funding of \$2,500,000 (the "Maximum Cost") for all costs of the Inquiry.

4.2 Before the Minister is obligated to pay for any Inquiry-related costs, the Commissioner shall establish and implement a system of internal budget monitoring and spending oversight acceptable to the Minister that ensures that the Commissioner:

- a) does not direct any monies for any purpose other than the conduct of the Inquiry, including the payment of witness and intervener fees, and the preparation of the Report;
- b) is able to account for all monies expended;
- c) complies with the financial reporting requirements under clause 6 of this Agreement;
- d) complies with the audit requirements under clause 5.1(c) of this Agreement; and
- e) will transfer to the Province any Capital Assets as required under clause 7.

5. Financial Records

5.1 The Commissioner shall:

- a) maintain adequate financial records relating to all expenditures for conducting the Inquiry;

- b) keep proper books, accounts and records of the cost of the materials, services or resources funded under this Agreement in accordance with Public Sector Accounting Standards;
- c) have the financial records, books, accounts and records of costs available at all times during the Term of this Agreement for copying, review and examination by the Minister or the Auditor General of Alberta. The Commissioner shall permit a representative of the Minister or Auditor General to examine and audit these books, accounts and records of costs and to take copies and extracts of them; and,
- d) on the expiry of the Term or termination of this Agreement, provide the financial records, books, accounts and records to the Minister.

6. Financial Reporting

- 6.1 During the Term, the Commissioner shall provide the Minister with a financial update within two (2) weeks of a request from the Minister.
- 6.2 The Commissioner shall, within 90 days of the expiry or termination of this Agreement, provide the Minister with financial reports on the Inquiry in accordance with Public Sector Accounting Standards and in a form acceptable to the Minister.

7. Capital Assets on Expiry or Termination

- 7.1 The Commissioner shall, within ninety days of the expiry or termination of this Agreement, transfer or return all capital assets, including but not limited to items such as equipment, furnishings, office supplies, computer equipment, telecommunication devices or equipment, reference materials, sound and light control equipment and recording devices ("Capital Assets") to the Province of Alberta. The Minister shall assist the Commissioner to transfer or return the assets to the Province of Alberta.

8. Funding Responsibilities of the Minister

- 8.1 The Minister shall pay for all costs of the Inquiry as determined and requested by the Commissioner, if those costs do not exceed the Maximum Cost.
- 8.2 The Minister shall provide the Services and incur the expenditures referred to in Appendix A on behalf of the Commissioner.

9. Compensation and Payment to the Commissioner for the Conduct of the Inquiry

- 9.1 The Commissioner will be paid a biweekly base salary of \$11,226.06, (the "Base Salary") less required deductions and withholdings. The Base Salary will be accounted for in the budget for the Inquiry.
- 9.2 The Commissioner shall not be entitled to any of the rights and benefits afforded to employees of the public service of Alberta except as provided for in this Agreement.
- 9.3 The Commissioner is eligible for the following benefits described in the *Public Service Employment Regulation* (the "Regulation") in accordance with the Regulation:

- a) Vacation leave;
- b) Vacation Supplement;
- c) Paid Holidays;
- d) Eighteen (18) days of illness leave, if required.

9.4 The Commissioner will be entitled to reimbursement of reasonable business expenses incurred while performing the duties of the inquiry as if he were an employee in the public service in accordance with the *Public Service Relocation and Employment Expenses Regulation* and the Treasury Board's *Travel, Meal and Hospitality Expenses Directive*.

10. Resourcing of the Inquiry

- 10.1 The Commissioner shall identify to the Minister any resources required to conduct the inquiry, including legal counsel, clerks, reporters, assistants, experts, persons having specialized or other knowledge or any other qualified persons.
- 10.2 Upon receiving from the Commissioner a request for services or resources, the Minister shall provide those services to or retain those resources on behalf of the Commissioner. The Minister may also assign staff to assist the Commissioner with the conduct of the inquiry.
- 10.3 The Minister acknowledges the independent role of the Commissioner as per section 16.1, and as such, the Minister confirms it is procuring the resources as an administrator only on behalf of the Commissioner. In accordance with the Commissioner's role, the Commissioner shall be entitled to select those resources at the Commissioner's sole discretion. Any contracts between the Minister and resources contracted to provide services to the Commissioner shall designate the Commissioner as the contact. The Minister's role under these contracts shall be limited to payments only.
- 10.4 The Commissioner may request Capital Assets from the Minister to support the inquiry, and the Minister will provide those Capital Assets or a reasonable alternative for the Commissioner's use.

11. Responsibility of the Minister limited to amount Specified in the Approved Budget

- 11.1 The Minister shall have no obligation to disburse any monies to the Commissioner or to pay any costs of the inquiry that exceed the Maximum Cost.

12. Records

- 12.1 The inquiry is not a public body pursuant to section 1(p) of the *Freedom of Information and Protection of Privacy Act* (the "FOIP Act") and, therefore, is not subject to the FOIP Act.
- 12.2 For greater clarity, all records collected and created by the Commissioner are owned by the Commissioner and are under the Commissioner's exclusive custody and control.

13. Non-Disclosure of Information

- 13.1 All records and information shall be collected and used by the Commissioner in accordance with the *Public Inquiries Act*.
- 13.2 All records and information may only be disclosed to the public in accordance with the *Public Inquiries Act*. For greater clarity, such disclosure includes the posting of records and information on the inquiry website.
- 13.3 In disclosing any record or information, the Commissioner shall take reasonable steps to disclose only the records and information necessary to the issues being dealt with in the inquiry.
- 13.4 The Commissioner shall make reasonable security arrangements against unauthorized access, use, disclosure, loss, destruction or alteration of all records and information obtained, generated, provided or collected by the inquiry. The Commissioner shall immediately advise the source of the record or information and the Minister of any unauthorized access, use, disclosure, loss or destruction, and shall provide any assistance reasonably required to rectify such a situation.
- 13.5 The Commissioner shall store all records and information obtained, generated, provided or collected by the inquiry only in Canada.
- 13.6 Prior to the release, transfer or destruction of any records or information obtained, generated, provided or collected during the inquiry, the Commissioner must obtain the consent of the Minister.
- 13.7 The Commissioner acknowledges that this Agreement, including without limitation, the name of the Commissioner, compensation payable, the Term, and details of the responsibilities of the Commissioner may be subject to disclosure under the *Freedom of Information and Protection of Privacy Act*.
- 13.8 Should the Commissioner receive an access request under the *Freedom of Information and Protection of Privacy Act*, the Commissioner shall not respond to it, but shall immediately forward the access request to the Minister for further handling.
- 13.9 No press release or public announcement relating to this inquiry shall be made by the Commissioner without the prior written approval of the Minister.

14. Termination

- 14.1 This Agreement shall terminate forthwith before July 2, 2020 if:
- a) the Lieutenant Governor in Council terminates the inquiry;
 - b) the Commissioner resigns; or,
 - c) the Commissioner becomes unable or unwilling to fulfill its obligations under this Agreement.
- 14.2 Upon termination of this Agreement, the Minister shall only be liable to pay for services provided or costs incurred under this Agreement up to and including the date of termination.

- 14.3 The Commissioner will be given written notice of the termination of this Agreement. The notice is intended to replace common law reasonable notice with certainty. The required termination notice will be the greater of entitlement pursuant to the *Employment Standards Code* or four (4) weeks (the "Notice Period").
- 14.4 In lieu of termination notice the Minister may, in its sole discretion, pay the Commissioner an amount equal to the Base Salary for the Notice Period, or a combination of termination notice and pay in lieu of notice (the "Severance Payment").
- 14.5 In exchange for the Severance Payment as described in clauses 14.4, the Commissioner agrees to execute a restrictive agreement and release that includes at least the following terms:
- [x] The Commissioner acknowledges and agrees that clauses 14.3 and 14.4 of the Agreement are reasonable and accepts the termination notice, payment in lieu of notice or combination thereof in full satisfaction of any claims or actions, including for common law entitlement. The Commissioner releases and discharges the Minister, the Government of Alberta and its agents and employees from any and all claims, complaints or causes of action which the Commissioner had, now has or may have in the future:
 - a) arising out of or related to the Commissioner's appointment or the termination of the Commissioner's engagement with the Minister; and,
 - b) arising under the *Employment Standards Code, Alberta Human Rights Act, Workers Compensation Act, Occupational Health and Safety Act, Freedom of Information and Protection of Privacy Act*, and any amendments or regulations passed under those enactments.

15. **Termination by Commissioner**

- 15.1 The Commissioner may terminate this Agreement by providing at least four (4) weeks' written notice to the Minister. The Minister reserves the right to waive all or part of the notice period, in which case the Commissioner will be paid the Base Salary during the waived period.
- 15.2 This Agreement will automatically end on the death of the Commissioner and no notice or pay in lieu of notice will apply.

16. **Relationship of the Parties**

- 16.1 The Commissioner is appointed under the *Public Inquiries Act* and is independent of the Minister. For greater certainty, the Commissioner is not a partner, joint venture, servant, or agent of the Minister and the Commissioner shall not purport to retain, contract with or employ any person on behalf of the Minister.

17. **Notice of Publication**

- 17.1 The Commissioner consents and agrees that this Agreement and any records and information created or collected pursuant to the Commissioner's engagement (including, but not limited to, name, salary, benefits) may be disclosed by the Minister. Decisions about disclosure are in the Minister's sole discretion.

18. Waiver

18.1 The failure of either party to this Agreement to enforce any of its terms, provisions or covenants will not be construed as a waiver of the same or of the right of such party to enforce the same. Waiver by either party hereto of any breach by the other party of any terms or provisions of this Agreement will not operate as a waiver of any other breach or default.

19. Notices, Approvals and Requests

19.1 Notices, approvals and requests referred to in this Agreement shall be in writing and, if under clauses 14 Termination and 15 Termination by Commissioner, shall be personally delivered or sent by recorded mail to the Minister or Commissioner at the address provided below.

TO THE MINISTER:

Grant Sprague
Deputy Minister of Energy
8th fl Petroleum Plaza NT
9945 - 108 Street
Edmonton, AB, T5K 2G6

TO THE COMMISSIONER:

Jackson Stephens Allan
C/O Dentons Canada LLP
15th Floor, Bankers Court,
850-2nd Street SW
Calgary, AB, T2P 0R8

Notices, approvals and requests are deemed to have been served as follows:

- (a) If personally delivered, upon delivery;
- (b) If by registered mail, on the third day after mailing.

19.2 All other notices, approvals and requests under this Agreement that are not referred to in clause 19.1 may be given in accordance with clause 19.1 or by e-mail and are deemed to have been provided 72 hours after the time of sending.

19.3 The contact information for notices, approvals and requests may be changed by notice to the other party.

20. Insurance and Indemnity

20.1 The Minister acknowledges that the Commissioner has liability coverage under the Crown's Risk Management Fund as a public official and under a Crown employee indemnity authorized under the *Financial Administration Act*, subject to the terms of those coverages.

21. Severability

21.1 If a term of this Agreement is held to be invalid, illegal or unenforceable, that term is deemed to be severed and the remaining terms of this Agreement continue to operate.

22. Governing Law

22.1 This Agreement shall be interpreted, governed and resolved in accordance with the laws of the Province of Alberta.

22.2 The Commissioner shall comply with the provisions of all laws, now in force or in force after the signing of this Agreement, that expressly or by implication apply to the Commissioner in performing the services.

23. Entire Agreement and Interpretation

23.1 The parties agree that the attached Appendices form part of this Agreement.

23.2 The provisions of this Agreement constitute the entire Agreement between the parties with respect to the subject matter of this Agreement, and supersede any prior Agreements or understandings whether written or oral between the parties and there are no Agreements, guarantees, representations or warranties of any sort made by either party, other than those contained herein, that form part of the Agreement between the parties hereto or that have been relied on by either party.

23.3 Notwithstanding that it is the intention of the parties that this Agreement expresses the whole of the contractual relations between them, the Minister and the Commissioner may add to, delete, vary, amend or extend the terms of this Agreement by a written amending Agreement signed by both parties.

23.4 Should there be a conflict between the provisions of this Agreement and the Terms of Reference referred to in the Commission in Schedule A, the Terms of Reference shall supersede the terms of this Agreement.

23.5 This Agreement shall enure to the benefit of and be binding upon the parties hereto and their successors and permitted assigns.

24. Participation in Legal Proceedings

24.1 After the termination or expiry of this Agreement, the Commissioner may be requested by the Minister to provide testimony in legal proceedings that involved the work performed by the Commissioner during the Term. The Commissioner will be compensated for assisting the Minister at the hourly rate of \$110.60 to the daily maximum of \$801.85 per day. Reasonable business expenses will be reimbursed in accordance with clause 9.4.

25. Survival of Terms

25.1 Despite any other provision of this Agreement, those clauses which by their nature continue after the conclusion or termination of this Agreement shall continue after such conclusion or termination, including but not limited to clauses 5.1(d), 13, 14, and 24.

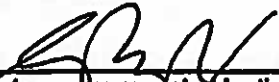
26. Assignment

26.1 The Commissioner shall not assign or subcontract this Agreement or any part of it without the prior written consent of the Minister.

27. Execution

27.1 This Agreement may be executed in counterparts, and delivered in PDF format by email or fax. A signature delivered by way of email or fax shall be as binding and effective as an original signature.

IN WITNESS WHEREOF, notwithstanding the dates of signature below, the parties hereto have made this Agreement to be effective as of the day, month and year first above written.

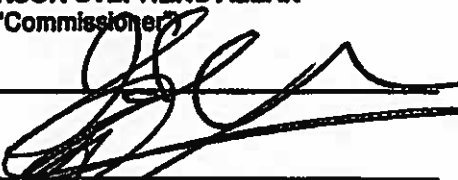


(the "Minister as represented by the Deputy Minister of Energy")

Grant Sprague

July 18, 2019
Date

JACKSON STEPHENS ALLAN
(the "Commissioner")



July 8, 2019
Date

Witness to the signature of the Commissioner