

RECONSIDERATION DECISION 23-07

(DETERMINATION DECISION 23-07)

DESIGNATED FILER: Brian Kuntz

March 28, 2024

SUMMARY:

In Determination Decision 23-07, an Investigator found that the designated filer for Uber Canada Inc. (Uber) contravened sections 4(1)(f) and (g), 4.1 and 5(1) of the *Lobbyists Transparency Act* (LTA), and issued an administrative penalty totaling \$4,500. Uber requested a reconsideration by challenging certain conclusions underlying the decision, but not the amount fined if the findings were to be upheld. The Registrar of Lobbyists confirmed the findings of, and the administrative penalty imposed by the Investigator.

Statutes Considered: *Lobbyists Transparency Act*, S.B.C. 2001, c. 42.

Authorities Considered: Determination Decision 23-07

INTRODUCTION

[1] On November 15, 2023, a delegate (the “Delegate”) of the Registrar of Lobbyists (“Registrar”) determined that the designated filer for Uber Canada Inc. (“Uber”) had contravened ss. 4(1)(f) and (g), 4.1 and 5(1) of the *Lobbyists Transparency Act*, S.B.C. 2001, c. 42 (the “LTA” or the “Act”). In particular, the designated filer had failed to list the name and address of its affiliates, failed to file monthly returns by the required dates, and entered inaccurate information into the Lobbyists Registry (“Registry”) and certified the information was true.

[2] Uber has requested a reconsideration of this decision, challenging five of the findings that underly her conclusions. If the findings are upheld on reconsideration, Uber concedes that the administrative penalty imposed by the Delegate is appropriate.

RELEVANT SECTIONS OF THE LTA

[3] The LTA imposes certain requirements on the “designated filer”. The term “designated filer” is defined in s. 1 of the Act as meaning in part:

- (b) in the case of an organization that has an in-house lobbyist,
 - (i) the most senior officer of the organization who receives payment for performing the officer’s functions, or
 - (ii) if there is no senior officer who receives payment, the most senior in-house lobbyist;

[4] Section 1 also defines the term “lobby”, which means in part “to communicate with a public office holder in an attempt to influence” any of the following:

- (i) the development of any legislative proposal by the government of British Columbia, a Provincial entity or a member of the Legislative Assembly,
- (ii) the introduction, amendment, passage or defeat of any Bill or resolution in or before the Legislative Assembly,
- (iii) the development or enactment of any regulation, including the enactment of a regulation for the purposes of amending or repealing a regulation,
- (iv) the development, establishment, amendment or termination of any program, policy, directive or guideline of the government of British Columbia or a Provincial entity,
- (v) the awarding, amendment or termination of any contract, grant or financial benefit by or on behalf of the government of British Columbia or a Provincial entity,
- (vi) a decision by the Executive Council or a member of the Executive Council to transfer from the Crown for consideration all or part of, or any interest in or asset of, any business, enterprise or institution that provides goods or services to the Crown, a Provincial entity or the public, or

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- (vii) a decision by the Executive Council or a member of the Executive Council to have the private sector instead of the Crown provide goods or services to the government of British Columbia or a Provincial entity,

[5] The Act specifically excludes certain activities from its scope. In accordance with s. 2(2), the Act does not apply to oral or written submissions made to a public officer holder in direct response to a written request from the public office holder (s. 2(2)(c)). It likewise does not apply to oral or written submissions concerning the interpretation of any Act or regulation (s. 2(2)(b)(i)).

[6] In accordance with s. 3(3) of the Act, within 10 days of the date on which an organization first has an in-house lobbyist, the designated filer of the organization must file with the Registrar a Registration Return in the prescribed form, containing the information required by s. 4. Section 4(1)(f) and (g) specifically requires Registration Returns to include the name and business address of each affiliate and subsidiary of the corporation:

- 4 (1)** Each registration return filed under section 3 must include the following information, as applicable:

...

- (f) if the client or organization is a corporation, the name and business address of each affiliate of the corporation that, to the designated filer's knowledge after making reasonable inquiries, has a direct interest in the outcome of the activities of each lobbyist named in the registration return who lobbies on behalf of the client or organization;
- (g) without limiting paragraph (f), if the client or organization is a corporation that is a subsidiary of another corporation, the name and business address of the other corporation;

[7] Thereafter, every designated filer who has filed a Registration Return is required to complete a Monthly Return no later than 15 days after the end of every month (s. 4.1). A Monthly Return must include the particulars of any change to the information in the registration return (s. 4.2(2)(e)(i)), such as any change to the designated filer for the organization. There is no requirement to file a Monthly Return if no lobbying activity occurred in the applicable month (s. 4.2(5)). However, a designated filer's Registration Return will be cancelled after six months if the designated filer does not file any Monthly Returns and does not file a return swearing no lobbying activities have taken place in that period (ss. 4.2(6-7)).

[8] Section 5(1) of the Act requires individuals who submit a document, including a return, to certify “that, to the best of the individual’s knowledge and belief, the information contained in the document is true.”

[9] The Registrar is designated in s. 7 of the Act. In accordance with s. 7.1(1), the Registrar is permitted to conduct an investigation if the Registrar considers it necessary to establish whether there is or has been compliance with the Act or its regulations. If the Registrar determines that there has been non-compliance, then the Registrar has the authority to, amongst other orders, impose a monetary administrative penalty (s. 7.2(2)(b)).

[10] A person who has been informed of a contravention in accordance with s. 7.2 may, within 30 days, request the Registrar reconsider a decision. On receiving a request, the Registrar must do all of the following (s. 7.3(3)):

- (a) consider the grounds on which the reconsideration is requested;
- (b) confirm or rescind the decision referred to in any or all of section 7.2 (2) (a), (b) or (b.1), as applicable, or confirm or vary the monetary amount or the prohibition duration;
- (c) if the monetary amount is confirmed or varied, confirm or extend the date by which the amount must be paid;
- (d) if the prohibition duration is confirmed or varied, specify the dates that the prohibition starts and ends;
- (e) notify the person in writing of the matters under paragraphs (b) to (d) of this subsection, as applicable, and of the reasons for the decision to rescind, confirm or vary under this section.

[11] Relevant to this reconsideration, the LTA was previously called the *Lobbyists Registration Act* [LRA]. The LRA was amended and renamed as the LTA effectively May 4, 2020, at which time a new Registry was launched.

[12] In light of the COVID-19 pandemic, as Registrar, I extended the transition period for lobbyists to register and file in the new Registry from June 15 to September 15, 2020. All lobbyists were required to submit accurate records on or before September 15, 2020. If lobbyists did not comply, then my office retained the authority to initiate a compliance

investigation for any compliance issues that may have arisen from May 4, 2020 to September 15, 2020.

BACKGROUND

[13] Uber was registered under the LRA prior to May 4, 2020. Uber did not update its registration after the new Registry launched. As a result, in July 2020, Office of the Registrar of Lobbyists (“ORL”) staff informed Uber that its registration would terminate automatically on September 16, 2020.

[14] Uber did not file its first Registration Return until January 8, 2021. Also on January 8, 2021, it submitted a Monthly Return declaring two lobbying activities, specifically:

- In Lobbying Activity Report **#2985-4919**, Uber declared lobbying that occurred on December 18, 2020, specifically communication with the office of the Minister of Public Safety and Solicitor General concerning commission caps on food delivery service fees.
- In Lobbying Activity Report **#2985-15558**, Uber declared lobbying activity that occurred on December 21, 2020, specifically an introductory meeting with representatives from the Ministry of Labour (the “**Ministry of Labour Communications**”).

[15] Thereafter, on July 16, 2021, Uber’s Registration Return was flagged for termination due to a failure to file Monthly Returns. On July 1, 2021, ORL staff wrote to Uber to remind it that its Registration Return was approaching termination. On July 2, 2021, Uber filed an updated Registration Return with an effective date of March 10, 2021, based on lobbying activity it had undertaken on March 10, 2021. No Monthly Return had yet been filed with respect to that lobbying activity. ORL staff provided Uber with a guidance document with instructions for reporting lobbying activity.

[16] On November 2, 2021, a consultant lobbyist, lobbying on behalf of Uber, submitted a Registration Return which did not list any affiliates or a parent company. Uber had likewise not listed any affiliates or parent companies in any of its past registration returns dating back to October 2018.

[17] The ORL staff returned the November 2, 2021 Registration Return to the consultant lobbyist for review, and sought further information from Uber. Uber’s representative then

informed ORL staff that Uber's parent company was Uber Technologies Inc., and that the following entities were affiliates of Uber: Uber Rasier Canada Inc., Uber Portier Canada Inc., Uber Castor Canada Inc., Uber Holdings Canada Inc. (direct parent of Rasier, UCI, Portier and Castor), Uber Canada Inc., Uber B.V., Rasier Operations B.V., and Uber Portier B.V.

[18] On or about November 15, 2021, the designated filer submitted an updated Registration Return, which included some, but not all, of the affiliates identified by its representative to the ORL. After ORL staff noted the discrepancy to Uber's representative, it filed a further updated Registration Return that listed all affiliates and the parent company.

[19] On January 13, 2022, about six months after ORL staff provide Uber with information about how to report lobbying activity, Uber submitted four Lobbying Activity Reports, all concerning lobbying activities that took place between January and November 2021, specifically:

- In Lobbying Activity Report #2985-15559, Uber declared lobbying activity that occurred on January 12, 2021, specifically communication with a government official about assistance with vaccine efforts (the "**Vaccine Communications**")
- In Lobbying Activity Report #2985-15562, Uber declared lobbying activity that occurred on March 24, 2021, specifically communication with a government official with respect to Uber's advocacy concerning benefits for app-based independent contractors (the "**Flexible Work+ Communications**")
- In Lobbying Activity Report #2985-15566 and #2985-15568, Uber declared lobbying activity that occurred on November 21 and 22, 2021, specifically communications with senior public office holders concerning exemptions from fuel rationing restrictions (the "**Fuel Rationing Communications**")

[20] On January 13, 2022, Uber's representative wrote to the ORL and sought instructions about how to update Uber's designated filer to Lola Kassim. ORL staff asked the representative to confirm that the new filer was the most senior paid officer at Uber. The Representative replied on January 18, 2022, that the representative was the most senior officer at Uber.

[21] On February 3, 2022, having still not received an updated Registration Return amending the designated filer, ORL staff sought an update from Uber's representative. On February 11,

2022, the representative sought information on what constituted a “senior officer”, which ORL staff provided.

[22] On February 22, 2022, Uber submitted a change to its Registration Return, identifying a different person than first indicated: Robert Wu. On February 24, 2022, Uber’s representative informed ORL staff that Robert Wu became the most senior paid officer of Uber on or about January 1, 2022.

[23] The Delegate commenced her investigation on or about May 30, 2022.

DISCUSSION AND FINDINGS

[24] Uber challenges certain conclusions the Delegate reached in connection with each of her findings of non-compliance. I address each in turn.

A. Breach of Sections 4(f) and (g) of the LTA – Listing of Affiliates in Registration Returns

[25] The Delegate found that Uber had breached ss. 4(f) and (g) of the LTA by filing Registration Returns that did not list any of its affiliates. She noted that Uber had submitted five Registration Returns dating back three years, from October 2018 to November 2021, and did not list any affiliates or its parent corporation until it was directly asked by the ORL whether it had any affiliates in the fall of 2021.¹ The Delegate considered Uber’s position that it is a “globally recognized brand and mark,” but found that “some of the affiliates disclosed by Uber do not necessarily identify with the brand and mark of Uber. The public should not be expected to guess or know which companies have a direct interest in Uber’s lobbying activities. That is why organizations are required to list affiliates in their Registration Returns.”²

[26] In any event, the Delegate found that the LTA is clear that Uber should have verified or confirmed whether it had affiliates or a parent company and submitted that information in its Registration Return, which is clearly required by Registry forms.³ The Delegate further found that the requirement to list affiliates has been in place since prior to the recent amendments to the LRA, and the designated filer should have been aware of their obligation to enter that information into the Registry.⁴

¹ Decision, para. 38

² Decision, para. 39

³ Decision, paras. 40-41

⁴ Decision, paras. 42-44

[27] Uber seeks reconsideration of the finding in paragraph 39 of the Decision that “some of the affiliates disclosed by Uber do not necessarily identify with the brand and mark of Uber.” Uber refers to the affidavit evidence of its representative, who deposed that the global Uber entities use the same branding, and carry on business in Canada under the trade name “Uber” (or “**Uber Eats**”). Thus, Uber says that all the affiliates identify with the brand and mark of Uber.

[28] I do not consider that Uber’s arguments provide a basis for reconsideration. As the Delegate found, and as I accept, the LTA and the Registry’s forms have always been clear that lobbyists must enter affiliate and parent company information. It was incumbent on Uber to verify and list all its affiliates. Even accepting Uber’s arguments that its affiliates share its branding, that fact has no bearing on the clear requirement in the LTA to list its affiliates and parent company in its registration returns.

[29] The Delegate found that Uber had breached ss. 4(f) and (g) of the LTA, and entered inaccurate information into the Registry contrary to s. 5(1) of the *LTA*. I confirm that aspect of the decision.

B. Breach of Section 4.1 – Late Lobbying Activity Reports - #2985-15562

[30] The Delegate found that Uber filed Lobbying Activity Report #2985-15562 (concerning the Flexible Work+ Communication) late. The lobbying activities took place March 24, 2021, and as a result the return for the activity ought to have been filed on April 15, 2021. The return was not filed until January 2022.⁵ The Delegate rejected Uber’s argument that it had been provided a grace period for filing its returns until July 2021, noting that there is no indication of the grace period in the communication with ORL staff, and Uber had otherwise not supported its claim of a grace period with evidence.⁶

[31] Uber seeks reconsideration of paragraph 56 of the Decision, where the Delegate found that the evidence did not support a conclusion that the ORL had offered Uber an enforcement grace period up until July 2021. Uber notes that its affiant had attested that she had been informed by ORL representatives that the ORL was granting lobbyists a grace period on all enforcement of the new lobbying registration regime. Uber also points to a July 12, 2021 email sent by their affiant to other Uber staff, where the representative notes, “We are currently still under a grace period by which they will act on any compliance issues.”⁷ Uber also suggests that

⁵ Decision, p. 10 (unnumbered paragraph)

⁶ Decision, para. 56

⁷ Affidavit #1 of Yanique Williams made July 14, 2022, Ex. JJ

the ORL could have undertaken some investigations into what transpired in telephone conversations given the grace period was allegedly extended by ORL staff.

[32] I do not see this as a basis for reconsideration. Like the Delegate, I do not accept Uber's evidence it had been offered an enforcement grace period. If such a grace period had been formally offered, I would have expected it to be recorded in written communication from ORL staff to Uber's representative. The communication between Uber employees referring to a grace period does not amount to confirmation from ORL staff.

[33] Even if Uber had been offered a grace period to July 2021, it did not file its Monthly Return concerning its March 2021 lobbying activity until January 2022. That is significantly beyond the timelines mandated under the LTA, and prevented the public from timely notice of Uber's lobbying activities.

[34] The Delegate found that the designated filer contravened s. 4.1 of the LTA when they failed to submit a Lobbying Activity Report by the deadline for lobbying activity that took place on March 24, 2021 (LAR #2985-15562). I confirm that aspect of the decision.

C. Breach of Section 4.1 – Late Lobbying Activity Reports - #2985-15566 and #2985-15568

[35] The Delegate found that the Lobbying Activity Reports #2985-15566 and #2985-15568 (concerning the Fuel Rationing Order Communications) were filed late.

[36] In response to flooding in British Columbia in the fall of 2021, the Government issued Ministerial Order 451/2021 (the "**Fuel Rationing Order**") — a fuel rationing order that rationed non-essential fuel purchases. Uber stated it was unclear from the Order whether rideshare drivers would be exempted as essential vehicles on the basis that they are "taxis". As it does on this reconsideration, Uber argued before the Delegate that the Fuel Rationing Order Communications were merely seeking clarity on whether rideshare drivers were exempt from the fuel rationing restrictions, and therefore were exempt from the Act pursuant to s. 2(2)(b)(i).

[37] The Delegate rejected this argument. The Delegate noted that an Uber representative had sent a text message to a senior public office holder where they stated "I trust the government will correct the [oversight] as the ride sharing is included in the definition of 'taxi'", and asks "[w]ill the update to the Order be shared today or tomorrow?"⁸ In light of that evidence, she found that Uber had attempted to have the Fuel Rationing Order, which on its face did not apply to rideshare drivers, clarified and corrected. In her view, doing so

⁸ Decision, paras. 65-66

constituted an attempt to influence a senior public office holder to amend a directive, and thus constituted lobbying.⁹

[38] Uber seeks reconsideration of the finding in paragraph 68 that Uber had engaged in lobbying with respect to the Fuel Rationing Order. Uber suggests it required clarity in the interpretation of the Fuel Rationing Order because rideshare vehicles fall within the definition of “taxi” in the *Motor Vehicle Act*, but statements in the media indicated government officials had stated rideshare vehicles were not “essential vehicles”. Uber suggests that the text message’s reference to the need to correct an “oversight” was intended to refer to the “oversight” of government mixed messages.

[39] I decline to reconsider the Decision on this basis. The text messages before the Delegate support her conclusion that Uber was attempting to influence a senior public office holder to amend an order to make it clear that rideshare drivers were exempt from it. To the extent Uber was “seeking clarity”, it is clear to me that it wanted clarity in the form of an amendment to the Fuel Rationing Order. I agree with the Delegate that seeking an amendment to the Fuel Rationing Order clearly meets the definition of lobbying, and the activity is not excluded from the Act pursuant to s. 2(2)(b)(ii) of the Act.

[40] The Delegate found that the designated filer contravened s. 4.1 of the LTA when they failed to submit a lobbyist activity report within the timelines set out in s. 4.1 of the LTA, to report lobbying activity that took place on November 21, 2021 and November 22, 2021 (LAR #2985-15566 and LAR #2985-15568).¹⁰ I confirm that aspect of the decision.

D. Breach of Section 4.1 – Late Change of Designated Filer

[41] The Delegate found that Uber had filed a return changing its designated filer to Robert Wu after the deadlines mandated in the LTA. She found that Mr. Wu became Uber’s most senior paid officer on or about January 1, 2022. Uber filed an amended Registration Return on February 22, 2022, when it ought to have been filed on February 15, 2022.¹¹ The Delegate rejected Uber’s argument that the definition of designated filer was unclear, with reference to the definition in the legislation. She found it was clear that Uber’s “CEO” was its most senior officer who receives payment for Uber.¹²

⁹ Decision, para. 68

¹⁰ Decision, para. 69

¹¹ Decision, para. 77

¹² Decision, para. 71

[42] Uber requests reconsideration of the Delegate’s finding at paragraph 71 that the definition of “designated filer” is clear. Uber takes the position that ORL staff gave Uber two “completely different” meanings for designated filer. In November 2019, ORL staff stated that the Designated Filer should be “the most senior paid person for the organization whose lobbying activities are being registered (in this case, Uber Canada Inc.)” Then in January 2022, ORL staff stated that the designated filer is the person who “oversees the day-to-day operations of Uber Canada Inc. on a full time basis.” Uber also argues that it does not, and has never appointed a senior officer into the role of CEO (although it has had a President and Secretary). Uber also disagrees that Uber’s leadership structure is easily accessible online, emphasizing that Uber’s Canadian business was largely split into two tiers, each with different leadership structures.

[43] I agree with the Delegate that the definition in the legislation is clear: the designated filer must be the “most senior officer of the organization who receives payment for performing the officer’s functions.” The advice Uber received in 2019 (that the designated filer is the “most senior paid person” for Uber) and 2022 (that the designated filer is the “most senior officer who receives payment”, and that a senior officer “oversees... day-to-day operations”) are both consistent with that statutory definition.

[44] Whether he receives remuneration as CEO or for some other function, there is no dispute that Mr. Wu has been Uber’s most senior paid officer since January 1, 2022, and that a return confirming he is the designated filer ought to have been filed by February 15, 2022. It was filed seven days after that date, with the result that the designated filer contravened s. 4.1 of the LTA.

[45] The Delegate found that the designated filer contravened s. 4.1 of the LTA when they failed to file a Monthly Return, on or before February 15, 2022, with information required under s. 4.2(2)(e)(i) of the LTA, about the change to its designated filer.¹³ I confirm that aspect of the decision.

E. Breach of Section 5(1) – Filing an Inaccurate Return - LAR #2985-15558 and #2985-15559

[46] In the course of the investigation, Uber took the position that a number of activities for which it filed Monthly Returns were excluded from the scope of the Act. In Uber’s submission, the Monthly Returns characterizing its activities as lobbying were made out of an “abundance of caution”.

¹³ Decision, para. 78

[47] The Delegate accepted Uber's argument that the Ministry of Labour Communications (reported in LAR #2985-15558) were not lobbying activities. The Ministry of Labour Communications did not amount to lobbying because there was no attempt to influence the public office holder.¹⁴

[48] However, the Delegate emphasized the importance of filing correct returns, which is embodied in s. 5(1) of the Act. She confirmed the purpose of the Lobbyists Registry is to provide transparency about lobbying activities in British Columbia, both past and present, so the public can know who is attempting to influence government at any point in time.¹⁵ She found that by submitting Monthly Returns with information on lobbying activities that did not actually occur, Uber undermined a fundamental tenant of the LTA, which is to promote transparency in lobbying communications. The false return prevented the public from knowing who is lobbying and the purpose of the activity.¹⁶

[49] Uber requests a reconsideration of the Delegate's finding that the designated filer had breached s. 5(1) by filing an inaccurate return. Uber takes the position that in light of the designated filer's evidence she had recorded the interactions out of an "abundance of caution" in good faith, and certified the information was true to the best of her knowledge and belief, there was no breach of s. 5(1). Uber would restrict the application of s. 5(1) to situations where a certification is made in bad faith, made untruthfully, or made with intent to deceive. In its submission, a good faith but ultimately inaccurate entry does not violate s. 5(1) so long as the individual follows the process required by s. 5(1) and believes the information to be true. Uber emphasizes that while s. 5(1) imposes a requirement to follow a certain procedure, it does not impose a substantive requirement for the information to be error free before it is submitted.

[50] With respect to the Ministry of Labour Communications (LAR #2985-15558), I agree with the Delegate that Uber entered inaccurate information into the Registry and certified it to be true, in breach of s. 5(1) of the Act. I also agree that doing so caused confusion and undermined the public's ability to know.

[51] I accept there may well be circumstances where a designated filer makes an honest mistake and an inaccurate return is not contrary to s. 5(1). But that is not what happened here. In this case, Uber's designated filer certified Uber's activities constituted lobbying, but the organization changed its mind when facing regulatory consequences. This pattern suggests

¹⁴ Decision, paras. 26-27

¹⁵ Decision, para. 85

¹⁶ Decision, para. 87

that Uber's designated filer did not take appropriate care and make adequate inquiries prior to filing its monthly returns.

[52] The Delegate found that the designated filer contravened s. 5(1) by entering inaccurate information in their Monthly Returns in LAR #2985-15558 and certifying it to be true. I confirm that aspect of the decision.

[53] The Delegate also may have found that the Vaccine Communications (reported in LAR #2985-15559) were lobbying.¹⁷ I agree with Uber that it is unclear whether the Delegate found that doing so was in breach of s. 5(1) of the Act. The Delegate made no finding as to whether the Vaccine Communications were excluded from the scope of the LTA, but went on to say that Uber submitted inaccurate information into the Lobbyists Registry in connection with that filing.¹⁸ Given the Delegate did not make a finding either way with respect to whether the Vaccine Communications were excluded from the scope of the LTA or not, it was not open to her to conclude that the information in that Lobbying Activity Report was inaccurate. Ultimately, however, the Delegate did not impose an administrative penalty for the filing of any inaccurate information in LAR #2985-15559.

[54] To the extent it is necessary for me to do so, I vary the Delegate's determination that the designated filer entered inaccurate information into the Registry in LAR #2985-15559. I confirm the Decision not to impose any administrative penalty.

CONCLUSION

[55] For the foregoing reasons, I confirm the Delegate's findings that Uber breached ss. 4.1(f) and (g), 4.1 and 5(1) of the LTA, except to the extent the Delegate found that inaccurate information was entered into the Registry contrary to s. 5(1) in LAR #2985-15559.

[56] Uber has not challenged the amount of administrative penalties imposed by the Delegate, and I note that no administrative penalty was imposed in connection with LAR #2985-15559. I therefore also confirm the Delegate's imposition of the following administrative penalties: a penalty of \$2,500 for contravening ss. 4(1)(f) and 4(1)(g) of the LTA; a penalty of \$1,500 for contravening s. 4.1 of the LTA; and a penalty of \$500 for entering inaccurate information into its Registration Return and certifying it to be true under s. 5(1) of the LTA. The total amount of administrative penalties is confirmed to be \$4,500.

¹⁷ Decision, para. 53

¹⁸ Decision, paras. 54, 88

[57] Pursuant to s. 7.3(3)(c) of the Act, I extend the date by which the administrative penalty must be paid to **May 13, 2024**.

Date: March 28, 2024

ORIGINAL SIGNED BY

Michael McEvoy
Registrar of Lobbyists for British Columbia