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March 10, 2013

Ontario Securities Commission
20 Queen Street West, Suite 1903
Toronto, ON M5H 3S8

In the Matter of IIROC and Steven George Conville, I humbly request an Oral Hearing review of the IIROC Decision of June 11th, 2012 and its subsequent penalty decision dated Feb 12, 2013. In this review I intend to demonstrate that:

1. the panel proceeded on an incorrect principle;
2. the panel erred in law;
3. the panel overlooked material evidence;
4. the panel was prevented from reviewing vital and compelling evidence that if presented at the time of the hearing would have drastically altered their findings in this case.

And that;

5. the actions of IIROC staff conflicts with that of the public interest as well as the OSC.

This case is extremely complicated and requires an examination of documents and evidence far greater than I could ever hope to provide in any one letter. However, please find below a brief outline of some of the issues in this matter.

The Participants

- Mahanaz Mahourvand -- the Mortgage Broker
- KH -- My friend, former employee, and Mortgage applicant and purchaser of home
- Dashiel Vasquez -- My friend and Mortgage applicant and purchaser of home

- Jackie Bishop-Martin -- My friend and Mortgage applicant and purchaser of home on the previous two deals

- RO, my former employee -- the purported verifier of the employment letter of KH

- Kathy Ference -- the mortgage under writer

- Ray Fadavi -- the real estate agent

- Bradley Barns -- The Lawyer

- The other lawyer -- for KH and Dashiell

- Steven Conville

3 registrants purportedly involved in this transaction:

- Steven(B), RO(B), and KH(W)

- IIROC chose to charge RO and Steven

Issues:

- There were 4 Mortgage applications - 1st with Jackie, 2nd with Jackie and Dashiell, 3rd with Jackie, Dashiell, and KH, 4th Dashiell and KH

- IIROC only subpoenaed the 4th deal and the Castlewood deal

- The panel never saw I believe the pattern of the Mortgage brokers or under writers behaviour

- I believe you have a copy of my credit bureau where it shows all of my refinance attempts, IIROC never subpoenaed those which would clearly show I never altered a document on any application

- The premise is that I was desperate and I forged documents but it makes no sense

- There are all my applications, If forging would have solved the problem, then why wouldn't I forge my own application, there would be no need to involve others

- a review of all the applications would have shown the true picture

- KH sent 95 % of her documents directly to Mahnaz, between Mahnaz and Kathy all of those documents were altered, by not calling the mortgage broker as a witness and the Mortgage under writer the panel never got to see who actually was a party to the changes

- In application 2 Dashiell through me sent an application that said he made 37000, that was the only document of his I ever handled

- In application 4 he made 47000, did application 2 say 37000 or did Mahnaz change it from application 2 or just on 4, did Kathy tell Mahnaz in order for 4 to be approved 37000 was not enough, there is too much behind the scenes that the panel was never presented

- There was a fake employment letter, from the very beginning RO said he had nothing to do with it. IIROC took the view that we had to be close friends, he took a call, verified the employment of KH

- The only thing that could lead to that conclusion was our colour, he and I were not close, I had seen him once in the previous 3 years and there were at least 7 former employees that I had a better relationship with

- the corporate security checked the signature on the letter and it did not match

- Kathy said she called a man with an "Indian Accent" named RO and when IIROC subpoenaed his phone records and there was no record of a call from Kathy to him moreover IIROC only investigated RO as an accomplice never as a victim and they only investigated Kathy as a victim and never an accomplice

- the net result is the panel or I never got to examine Kathy or her evidence

- RO aggressively pursued IIROC and Kathy, after his motion to cross examine Kathy, Scotia Bank and Kathy refused to Participate in the hearing and IIROC dropped their charges against RO as we were charged jointly

- IIROC amended their hearing notice and removed all reference to RO but they were not calling the Mortgage broker and they were not calling the under writer, now the 2 people with access to all the documents in their original and final forms were not part of the process

- how can we discuss what was forged and what was not forged without testimony from either or both of these individuals, again the panel only saw approximately 15% of what happened and formed their opinion of me

- The panel in its decision implied I had something to do with the letter or knew about it, the letter was prepared on letter head from a location that I never worked at or had access to -- I believe the letter was manufactured by a professional. It had to come from either the mortgage broker or the under writer -- to many things do not add up

- Dashiel Vasquez's job letter does not match his application, it says he makes 47000. But the application says he makes 37000. Dashiel's pay stub says he paid bi weekly, but his job letter says he paid semi-monthly

- two issues, Kathy Ference approved this deal and it was sent to the lawyers for signing, why did she not notice the fact that pay stub and the job letter did not match. There is no way a seasoned Mortgage Broker or Under Writer would miss this, the panel never saw this and this again hurt my chances to a fair verdict

- I was applying for my own refinancing, IIROC could have checked those applications. As a registrant they can request those financials, they could have verified my story
- when I was interviewed I told IIROC that Mahnaz called and told me that I had been approved for a mortgage and asked me to send a copy of my portfolio statements
 - my statements were altered, either by the mortgage broker or the or the under writer
- Stephanie Vicari, my associate, was put on the statements as the advisor, but neither the Mahnaz or Kathy called Stephanie to verify the statements, this make no sense
 - if I was involved, i would have asked Stephanie to lie for me to verify the call for the bank, but the bank never called? why how? I never got a chance to ask this question of Kathy, the panel never got hear or see this and this impacted the verdict
- When HSBC corporate security interviewed Mahnaz he asked her where she got the holms/vasquez mortgage application she said she got the entire file from "Sara Khan" who was this mystery lady? why did she not just say Steven? none of this makes sense
 - When IIROC interviewed me, they asked me who is Sara Khan... I had no idea... it was on disclosure I saw why they asked me that
- When IIROC interviewed Holms they asked her about Sara Khan, she had no clue either
 - By not compelling Mahnaz the panel never had a chance at making an objective verdict, 85% of what took place never was in their hands
- CI and Macquarie's compliance both interviewed Mahnaz. After they talked Mahnaz, with 20 mins they were more than confident I was telling the truth
- IIROC was also aware that there was something fishy with the law firm Bradly Barns, from what I understand it was a "fake" firm they promised to follow up and never did
- IIROC was forced to cut a deal with RO, and as a result in exchange for his release he had to refuse to provide evidence against then -- the panel could never hear his evidence
 - IIROC never interviewed the real estate agent, either lawyer, Jackie Bishop Martin, Dashiel Vasquez, did not compel KH or Kathy Ference or Mahnaz but they did investigate charge and prosecute me -- of 10 participants in a transaction the panel only saw me. -- There's nothing fair about this
- There has been such difficulty to explain things and under the circumstances you could see why it is hard to communicate, they accused me due to timing of emails of forging Dashiel and KH's purchase and sale agreement, this makes no sense
- Dashiel had signed a purchase and sale agreement on the second and third application and KH has told IIROC that she had no problem signing the purchase offer as she was buying the house

- I was very busy, did not check my Macquarie email in a timely fashion. I got a call from Mahnaz saying she had the updated purchase offer and she needed me to sign. She said she sent it to my hotmail, I log on and printed the document signed it and sent it back. -- without the panel hearing from all parties, my story seems weak, but once the two internal investigation I went through spoke with Mahnaz it was clear to two independent companies I was telling the truth and if the panel had the same opportunity I would be vindicated. Moreover, the Panel in its decision finds KH's testimony to lack credibility. However, they also use that same testimony to find against me. This is not right.

As a result of the IIROC decision and process, I was forced to leave the industry, sell my business at a reduced value and unfavourable terms and an end an otherwise 14 year spotless career. Moreover, in addition to the 6 month suspension, the \$65 000 required for me to re-enter the industry I love is a barrier to high for me to presently surmount. It is my hope that after an OSC panel reviews all evidence that was available to IIROC staff, but unavailable to the IIROC Panel, a stay of the IIROC decision against me, and its subsequent penalty, will be granted. I would also like the OSC to also review the conduct of IIROC as it pertains to the leaking of the penalty decision and the Regulators subsequent conduct which contributed to a 4 month to 6 month delay in this process and ultimately lead to the end of my employment at Macquarie Private Wealth.

Thanks for your attention in this matter,

Steven Conville