

**IN THE MATTER OF THE *SECURITIES ACT*
R.S.O. 1990, c.S.5, AS AMENDED**

AND

**IN THE MATTER OF MURRAY HOULT POLLITT AND
POLLITT & CO. INC.**

**ORDER
(Sections 127 and 127.1)**

WHEREAS on August 30, 2004, the Ontario Securities Commission issued a Notice of Hearing pursuant to sections 127 and 127.1 of the *Securities Act* (the "Act") in respect of Murray Houlth Pollitt ("Pollitt") and Pollitt & Co. Inc. ("Pollitt & Co.");

AND WHEREAS Pollitt and Pollitt & Co. entered into a settlement agreement with Staff of the Commission (the "Settlement Agreement"), in which they agreed to a proposed settlement of the proceeding commenced by the Notice of Hearing, subject to the approval of the Commission;

AND UPON reviewing the Settlement Agreement and the Notice of Hearing and Statement of Allegations of Staff of the Commission, and upon hearing submissions from counsel for Pollitt and Pollitt & Co. and from Staff of the Commission;

AND WHEREAS the Commission is of the opinion that it is in the public interest to make this Order;

IT IS HEREBY ORDERED THAT:

- (a) pursuant to clause 1 of subsection 127(1) of the Act, the registration of the Respondent Murray Pollitt as a trading officer be suspended effective the

close of business today for a period of 30 days effective from the date of this Order;

- (b) pursuant to subsection 127(2) and further to a review of its practices and procedures in 2002 and 2003, Pollitt & Co. forthwith retain Cassels Brock Regulatory Consulting Inc., at its sole expense, to ensure that its revised practices and procedures have been properly implemented and to ensure that compliance staff and trading officers are properly trained in their obligations, roles and responsibilities;
- (c) pursuant to clause 6 of subsection 127(1) of the Act, the Respondents are reprimanded by the Commission; and
- (d) pursuant to section 127.1 of the Act, the Respondents, or either of them, make payment by certified cheque to the Commission in the amount of \$27,000 in respect of a portion of the costs of the investigation and proceeding in relation to this matter.

DATED at Toronto this 17th day of November, 2004

“Paul M. Moore”

“Robert W. Davis”

Paul M. Moore

Robert W. Davis

“David L. Knight”

David L. Knight