

DISCIPLINE COMMITTEE
OF THE ONTARIO MOTOR VEHICLE INDUSTRY COUNCIL

PANEL:	Mr. Robert MacKay, Chair	Public Member
	Mr. Christopher Pinelli	Registrant
	Mr. Joe Wade	Registrant

DISCIPLINE DECISION

IN THE MATTER OF A DISCIPLINE HEARING HELD PURSUANT TO THE MOTOR
VEHICLE DEALERS ACT 2002, S.O. 2002, C.30, Sch. B

BETWEEN :

Appearances¹:

REGISTRAR, MOTOR VEHICLE
DEALERS ACT, 2002

Mr. Rishi Nageshar
for the Registrar

- and -

AIRPORT HYUNDAI

Mr. Justin Jakubiak
for the Registrants

and

MINAZ SHAMJI

and

MAHADEEN HATTIM

Date of Hearing: September 12, 2023

¹ Also present at the hearing were the Panel's independent legal counsel Ms Karen Bernofsky, and Hearing Administrators Mr. David Dailly and Ms Tessa Lee who recorded the hearing.

Findings:

900917 Ontario Limited o/a Airport Hyundai has breached the following:

Sections 4(2) and 9(3) of the Code of Ethics, Ontario Regulation 332/08, as these sections relate to all-in pricing only.

Mahadeen Hattim has breached the following:

Sections 6(2) and 9(3) of the Code of Ethics, Regulation 332/08, as these sections relate to all-in pricing only.

DECISION AND REASONS

Introduction

This was a hearing before a panel of the Discipline Committee (the "Panel") of the Ontario Motor Vehicle Industry Council ("OMVIC") pursuant to section 17 of the *Motor Vehicle Dealers Act, 2002*, S.O. 2002, c. 30, Schedule B ("MVDA"). OMVIC has a mandate to maintain a fair and informed marketplace by protecting the rights of consumers, enhancing industry professionalism, and ensuring fair, honest, and open competition for registered motor vehicle dealers.

The hearing was convened on September 12, 2023 (the "Hearing") and held virtually using video conferencing with the consent of the parties. The Hearing proceeded on the basis of an Agreed Statement of Facts and Joint Submission on Penalty.

The Allegations

The allegations against 900917 Ontario Limited o/a Airport Hyundai, and Mr. Mahadeen Hattim (collectively the "Registrants") were set out in the Amended Notice of Complaint of Further and Other Particulars (the "Notice of Complaint"), dated June 21, 2023. The Notice of Complaint was entered as Exhibit 1 at the Hearing and is attached to these reasons as Appendix "A". It was noted at the outset that the Notice of Complaint stated

the Registrar was withdrawing all the allegations concerning Mr. Minaz Shamji. The remaining allegations set out in the Notice of Complaint were as follows:

Contravention of the Code of Ethics by the Dealer

On or before February 28, 2022, the Dealer advertised a 2017 Honda Ridgeline, Stock# (U22513A) with a selling price of \$34,995 plus tax and licensing.

On or about February 28, 2022, OMVIC investigators visited the Dealer and made inquiries about the above referenced vehicle, while posing as members of the public.

A representative of (the) Dealer advised the OMVIC investigators that the above referenced advertised vehicle price was not inclusive of a \$399 “add[itional] equip[ment]” fee. The Dealer representative went on to explain this fee represented a mandatory administration fee.

As such, the advertised price was not all-inclusive. This was contrary to section 36(7) of Ontario Regulation 333/08, as well as sections 4(2) and 9(3) of the Code of Ethics.

Contravention of the Code of Ethics by Mr. Hattim

Mr. Hattim failed to ensure that the Dealer conducted its business in compliance with the Act and Code of Ethics and thus he has personally contravened sections 6(2) and 9(3) of the Code of Ethics.

At the outset of the Hearing, counsel for the Registrar, Mr. Rishi Nageshar, advised that discussions with the responding parties had resulted in an agreement which they intended to present.

Plea of the Registrants

The Registrants did not attend the Hearing; however, they were represented by counsel. It was confirmed on the record that the Registrants were aware of the Hearing and Mr. Jakubiak would represent them at the Hearing. The Registrants admitted all the remaining allegations contained in the Notice of Complaint through their admissions in the Agreed Statement of Facts. The Panel was satisfied that the admissions of the Registrants were voluntary, informed, and unequivocal.

Agreed Statement of Facts

The Agreed Statement of Facts (the "ASF")² which had been signed by the Registrants on July 26, 2023, and the Registrar on July 27, 2023, was entered as Exhibit 2 at the Hearing. The ASF is attached to these reasons as Appendix "B". Mr. Nageshar on behalf of OMVIC, and then Mr. Jakubiak on behalf of the Registrants, took the Panel through the ASF.

The relevant portions of the ASF for the purpose of this decision are as follows:

OMVIC registrant education re: all-in pricing

Since the Act was proclaimed, OMVIC has issued various publications and webinars reminding dealers of their obligation to advertise all-inclusive vehicle prices ("all-in pricing"). The dates of said publications are attached hereto as Schedule A. All these publications continue to be available on OMVIC's website.

Direct correspondence with Dealer:

By email dated March 29, 2010, the Dealer was reminded of its all-in pricing obligations.

By letter dated March 31, 2010, the Dealer was reminded of its all-in pricing obligations.

During an inspection on or about May 7, 2013, dealers' all-in pricing obligations were discussed with the Dealer.

Dealer's Contravention of the Code of Ethics

On or before February 28, 2022, the Dealer advertised a 2017 Honda Ridgeline, Stock# (U22513A)(the "Vehicle") with a selling price of \$34,995 plus tax and licensing.

² Prior to the beginning of the Hearing, the anticipated exhibits were delivered to the Panel members electronically in the interests of hearing economy and on consent of the parties.

On or about February 28, 2022, OMVIC investigators visited the Dealer and made inquiries about the Vehicle, while posing as members of the public.

During pre-purchase discussions regarding the Vehicle and pricing, a salesperson on behalf of the Dealer advised the OMVIC investigators that the above referenced advertised price was not inclusive of a \$399 "add[itional] equip[ment]" fee. The Dealer representative went on to explain this fee represented a mandatory administration fee.

As such, the advertised price was not all-inclusive. This was contrary to section 36(7) of Ontario Regulation 333/08, as well as sections 4(2) and 9(3) of the Code of Ethics, as related to all-in pricing requirements only.

The Dealer has since provided all staff with additional training, changed its dealership software and committed to ensuring the Dealer representative involved in the above referenced circumstances successfully completes the MVDA Key Elements course.

The Panel then sought and received advice from its Independent Legal Counsel, Ms Bernofsky, before rising to deliberate on the merits portion of the Hearing.

Decision of the Panel

Upon reconvening, the Panel stated it was satisfied that the facts admitted by the Registrants in the ASF were sufficient to make findings of breaches against the Registrants as alleged in the Notice of Complaint. The Panel made findings against Airport Hyundai and Mr. Mahadeen Hattim. In reaching its decision the Panel relied exclusively on the ASF.

The Panel found that the Dealer and Mr. Hattim failed to comply with Regulation 333/08 section 36(7) and therefore made the following findings:

900917 Ontario Limited o/a Airport Hyundai has breached the following:

Sections 4(2) and 9(3) of the Code of Ethics, Ontario Regulation 332/08, as these sections relate to all-in pricing only.

Mahadeen Hattim has breached the following:

Sections 6(2) and 9(3) of the Code of Ethics, Regulation 332/08, as these sections relate to all-in pricing only.

Penalty

The Panel was presented with a Joint Submission on Penalty (the "JSP") which was entered as Exhibit 3 and is attached to these reasons as Appendix "C". The terms of the JSP are that:

1. The Dealer agrees to pay a fine in the amount of \$3,500 no later than **September 30, 2023**.
2. The Dealer agrees to ensure that the Dealer representative identified at paragraph 9 of the Notice of Complaint dated February 28, 2023, completes the MVDA Key Elements course (the "Course"), at the Dealer's expense, no later than **October 31, 2023**.
3. Mahadeen Hattim agrees to successfully complete the Course no later than **October 31, 2023**.
4. The Dealer agrees to offer all current and future sales staff the opportunity to complete the Course. Current sales staff will be offered the Course no later than **September 30, 2023**. Future sales staff will be offered the Course within 90 days of being retained in this capacity. The Dealer will incur all costs associated with this. It is understood between the parties this clause does not apply to sales staff who have completed the Course after January 1, 2009, or who are otherwise required to do so pursuant to the Act.
5. The Dealer and Hattim agree to comply with the Act and Standards of Business Practice, as may be amended from time to time.

In submissions, Mr. Nageshar, on behalf of the Registrar, among other things, drew our attention to two recent decisions³ of the Discipline Committee. They had similar facts and findings and the penalties in those matters gave the Panel a range that would be helpful.

Mr. Jakubiak in his submissions agreed with the submissions of OMVIC counsel and the authorities cited.

After calling on both parties to make submissions on penalty, the Panel sought and received advice from Ms Bernofsky on the record. Ms Bernofsky advised that the Panel could consider whether the penalty orders would serve as a general and/or specific

³ OMVIC Book of Authorities, Tabs 3 and 4.

deterrent and whether they provided any opportunity for remediation or rehabilitation on the part of the Registrants. In addition, Ms. Bernofsky reminded the Panel that it should not depart from the Joint Submission on Penalty unless it found the proposed penalty to be so unhinged from the circumstances of the offence and the offender that its acceptance would lead reasonable and informed persons, aware of all the relevant circumstances, including the importance of promoting certainty in resolution discussions, to believe that the proper functioning of the justice system had broken down.

Penalty Decision and Reasons

The Panel accepted the JSP and made an order consistent with its terms before the conclusion of the Hearing. The JSP does not pose any risk to the publicly perceived integrity of the Tribunal. The Panel had no grounds to consider rejecting it.


The Parties had come to a resolution which contemplated the relevant objectives on penalty including public protection, remediation/rehabilitation, specific deterrence for the Registrants, and general deterrence to others in the profession. Additionally, the terms of the JSP are not inconsistent with other orders made by the Discipline Committee in similar circumstances. Although not binding on this Panel, we acknowledge the authorities cited by counsel for OMVIC, and we agree that it demonstrated that the proposed penalty was indeed consistent with comparable, prior, decisions of this Tribunal.

On the basis of the foregoing, the Panel made the following order:

1. The Dealer is to pay a fine in the amount of \$3,500 no later than **September 30, 2023.**
2. The Dealer is to ensure that the Dealer representative identified at paragraph 9 of the original unamended Notice of Complaint dated February 28, 2023, completes the MVDA Key Elements course (the "Course"), at the Dealer's expense, no later than **October 31, 2023.**
3. Mahadeen Hattim is to successfully complete the Course no later than **October 31, 2023.**

4. The Dealer is to offer all current and future sales staff the opportunity to complete the Course. Current sales staff will be offered the Course no later than **September 30, 2023**. Future sales staff will be offered the Course within 90 days of being retained in this capacity. The Dealer will incur all costs associated with this. It is understood between the parties this clause does not apply to sales staff who have completed the Course after January 1, 2009, or who are otherwise required to do so pursuant to the Act.
5. The Dealer and Hattim is to comply with the Act and Standards of Business Practice, as may be amended from time to time.

I, Robert MacKay, sign this decision and reasons for the decision as Chair of this discipline Panel and on behalf of the members of the discipline Panel as listed below.



Mr. Robert MacKay, Chair

Date: October 5, 2023

Panel Members:

Mr. Robert MacKay
Mr. Christopher Pinelli
Mr. Joe Wade

Appendix "A"

IN THE MATTER OF
THE VIOLATION OF THE CODE OF ETHICS and Standards of Business Practice

TO: 900917 Ontario Limited o/a
Airport Hyundai
2294 Dundas Street
London, ON N5V1R5

AND TO: Minaz Shamji
590 Stenbeck Place
Waterloo, ON N2T1Z3

AND TO: Mahadeen ("Dean") Hattim
4336 Masterson Crescent
London, ON N6P1T4

AMENDED NOTICE OF COMPLAINT OF FURTHER AND OTHER PARTICULARS

Take notice that pursuant to section 17 of the Motor Vehicle Dealers Act, 2002, ("the Act"), the Registrar issued a Notice of Complaint against 900917 ONTARIO LIMITED o/a AIRPORT HYUNDAI and MINAZ SHAMJI for violating the Code of Ethics, as set out in Ontario Regulation 332/08.

Section 17 of the Act establishes a Discipline Committee and empowers the Discipline Committee to deal with breaches of the Code of Ethics. The Code of Ethics applies to all Registrants registered under the *Motor Vehicle Dealers Act, 2002*. Any Registrants that disregard or violate the Code of Ethics are subject to having their conduct reviewed by the Discipline Committee. The Code of Ethics requires that all Registrants conduct business with Integrity, Accountability, Compliance, Respect and Professionalism as well as ensuring that minimum requirements are met when it comes to Disclosure in Marketing and the Disclosure of Information in Contracts of Sale and Lease.

And take further notice that that the Registrar withdraws all allegations as particularized in the Notice of Complaint issued on February 28, 2023, concerning **MINAZ SHAMJI**.

And take further notice that that the Registrar also hereby amends the Notice of Complaint to add **MAHADEEN HATTIM** as a party to the proceeding.

And take further notice that the Registrar also hereby amends the Notice of Complaint to the following:

PARTICULARS

The reasons for this notice are:

Background

1. 900917 Ontario Limited o/a Airport Hyundai (the "Dealer") was first registered as a motor vehicle dealer since in around November 1998.
2. Mahadeen Hattim ("Hattim") was first registered as a motor vehicle salesperson in around June 2000. At all material times, Hattim has been the General Manager of the Dealer.

OMVIC registrant education re: all-in pricing

3. Since the Act was proclaimed, OMVIC has issued various publications and webinars reminding dealers of their obligation to advertise all-inclusive vehicle prices ("all-in pricing"). The dates of said publications are attached hereto as Schedule A. All these publications continue to be available on OMVIC's website.

Direct correspondence with Dealer:

4. By email dated March 29, 2010, the Dealer was reminded of its all-in pricing obligations.
5. By letter dated March 31, 2010, the Dealer was reminded of its all-in pricing obligations.
6. During an inspection on or about May 7, 2013, dealers' all-in pricing obligations were discussed with the Dealer.

Dealer's Contravention of the Code of Ethics

7. On or before February 28, 2022, the Dealer advertised a 2017 Honda Ridgeline, Stock# (U22513A) with a selling price of \$34,995 plus tax and licensing.
8. On or about February 28, 2022, OMVIC investigators visited the Dealer and made inquiries about the above referenced vehicle, while posing as members of the public.
9. A representative of Dealer advised the OMVIC investigators that the above referenced advertised vehicle price was not inclusive of a \$399 "add[itional] equip[ment]" fee. The Dealer representative went on to explain this fee represented a mandatory administration fee.
10. As such, the advertised price was not all-inclusive. This was contrary to section 36(7) of Ontario Regulation 333/08, as well as sections 4(2) and 9(3) of the Code of Ethics.

Hattim's contravention of the Code of Ethics

11. Hattim failed to ensure that the Dealer conducted its business in compliance with the Act and Code of Ethics and thus he has personally contravened sections 6(2) and 9(3) of the Code of Ethics.

Please provide a written Statement of Response to the particulars set out above, to OMVIC within 15 days of service of this notice.

The Discipline Committee can order one or more of the following:

- Dismiss the file;
- Order a fine up to \$25,000, per party;
- Require the registrant to take further educational courses;

- If the Registrant is a motor vehicle dealer, require the motor vehicle dealer to fund educational courses for salespersons employed by the dealer or to arrange and fund such educational courses;
- Award Costs

Decisions of the Discipline Committee will be published. Hearings before the Discipline Committee will be recorded.

APPLICATION OF THE STATUTORY POWERS PROCEDURE ACT

The *Statutory Powers Procedure Act*, (R.S.O. 1990, Chapter S.22), as amended, applies to the hearing to be held by this Discipline Committee. A party to a proceeding may be represented by counsel or an agent.

The Registrar states that the good character, propriety of conduct or competence of the Dealer shall be an issue in any hearing before the Discipline Committee and OMVIC has, therefore, furnished herein reasonable information of allegations with respect thereto.

The Rules of Practice of the Discipline Committee will apply, copy attached. A Notice of Hearing and Book of Disclosure will be provided in accordance with the Rules of Practice of the Discipline Committee.

Take note that as per the attached Rules of Practice, failure to attend a hearing before the Discipline Committee will result in a decision being determined ex parte, in your absence.

APPLICATION OF THE RULES OF PRACTICE OF THE DISCIPLINE COMMITTEE

This is to serve notice that the Registrar shall make application for its cost pursuant to Rule 13 of the Rules of Practice.

FURTHER PARTICULARS/SUPPLEMENTAL NOTICE

The Registrar may provide further and other particulars in respect of any other matters herein or in respect to any other matter including further particulars of violations of the Code of Ethics, Standards of Business Practice.

DATED at Toronto, this day of 2023.

Maureen Harquail
Registrar
Motor Vehicle Dealers Act, 2002

Appendix "B"

DISCIPLINE COMMITTEE OF THE ONTARIO MOTOR VEHICLE INDUSTRY COUNCIL

IN THE MATTER OF A DISCIPLINE HEARING HELD PURSUANT TO THE *MOTOR VEHICLE DEALERS ACT, 2002, S.O. 2002, c.30, Sch. B*

BETWEEN:

REGISTRAR, *MOTOR VEHICLE DEALERS ACT, 2002*

- and -

900917 ONTARIO LIMITED o/a AIRPORT HYUNDAI

- and -

MAHADEEN HATTIM

AGREED STATEMENT OF FACTS

900917 Ontario Limited o/a Airport Hyundai has breached the following:

Sections 4(2) and 9(3) of the Code of Ethics, Ontario Regulation 332/08, as these sections relate to all-in pricing only.

Mahadeen Hattim has breached the following:

Sections 6(2) and 93 of the Code of Ethics, Regulation 332/08, as these sections relate to all-in pricing only.

SUMMARY OF AGREEMENT

The parties to this proceeding agree that:

Background:

1. 900917 Ontario Limited o/a Airport Hyundai (the "Dealer") was first registered as a motor vehicle dealer since in or around November 1998.
2. Mahadeen Hattim ("Hattim") was first registered as a motor vehicle salesperson in or around June 2000. At all material times, Hattim was the General Manager of the Dealer.

OMVIC registrant education re: all-in pricing

3. Since the Act was proclaimed, OMVIC has issued various publications and webinars reminding dealers of their obligation to advertise all-inclusive vehicle prices ("all-in pricing"). The dates of said publications are attached to the Notice of Complaint dated February 28, 2023 as Schedule A. All these publications continue to be available on OMVIC's website.

Direct correspondence with Dealer:

4. By email dated March 29, 2010, the Dealer was reminded of its all-in pricing obligations.
5. By letter dated March 31, 2010, the Dealer was reminded of its all-in pricing obligations.
6. During an inspection on or about May 7, 2013, the Dealers' all-in pricing obligations were discussed with the Dealer.

Previous Discipline Decision:

7. On July 7, 2014, the Discipline Committee issued an order against the Dealer and Minaz Shamji because of its failure to provide purchasers with written accident repair disclosure and a non-compliant advertisement.
8. The Discipline Committee ordered a fine in the amount of \$4,000 and that future advertisements comply with the Act, among other things.
9. The previous Discipline Committee order does not factor into the Registrar's Complaint or the joint-submission on penalty due to:
 - a. the amount of time that has elapsed between the previous order and the within matter; and
 - b. the previous order involves a complaint unrelated to all-in pricing.

Dealer's Contravention of the Code of Ethics

10. On or before February 28, 2022, the Dealer advertised a 2017 Honda Ridgeline, Stock# (U22513A)(the "Vehicle") with a selling price of \$34,995 plus tax and licensing.
11. On or about February 28, 2022, OMVIC investigators visited the Dealer and made inquiries about the Vehicle, while posing as members of the public.
12. During pre-purchase discussions regarding the Vehicle and pricing, a salesperson on behalf of the Dealer advised the OMVIC investigators that the above referenced advertised price was not inclusive of a \$399 "add[itional] equip[ment]" fee. The Dealer representative went on to explain this fee represented a mandatory administration fee.
13. As such, the advertised price was not all-inclusive. This was contrary to section 36(7) of Ontario Regulation 333/08, as well as sections 4(2) and 9(3) of the Code of Ethics, as related to all-in pricing requirements only.
14. The Dealer has since provided all staff with additional training, changed its dealership software and committed to ensuring the Dealer representative involved in the above referenced circumstances successfully completes the MVDA Key Elements course.

Hattim's Contraventions of the Code of Ethics

15. Hattim failed to ensure that the Dealer conducted its business in compliance with the Act and Code of Ethics and thus he has personally contravened sections 6 and 9 of the Code of Ethics by failing to comply with the following section of Regulation 333/08:

36. Advertising

(7) If an advertisement indicates the price of a motor vehicle, the price shall be set out in a clear, comprehensible and prominent manner and shall be set out as the total of,

(a) the amount that a buyer would be required to pay for the vehicle; and

(b) subject to subsections (9) and (10), all other charges related to the trade in the vehicle, including, if any, charges for freight, charges for inspection before delivery of the vehicle, fees, levies and taxes.

16. It is thereby agreed that the Dealer has contravened the following section of the Code of Ethics, as set out in Regulation 332/08, as it relates to all-in pricing.

Disclosure and marketing

4 (2) A registrant shall ensure that all representations, including advertising, made by or on behalf of the registrant in connection with trading in motor vehicles, are legal, decent, ethical and truthful.

17. It is thereby agreed that the Dealer and Hattim have contravened the following section of the Code of Ethics, as set out in Regulation 332/08, as it relates to all-in pricing.

Professionalism

9 (3) A registrant shall use the registrant's best efforts to prevent error, misrepresentation, fraud or any unethical practice in respect of a trade in a motor vehicle.

It is thereby agreed that Hattim has contravened the following section of the Code of Ethics, as set out in Regulation 332/08;

Accountability:

6(2) A registered salesperson shall not do or omit to do anything that causes the registered motor vehicle dealer who employs or retains the salesperson to contravene this Regulation or any applicable law with respect to trading in motor vehicles.

By signature below, I acknowledge that I have read, understand, and agree with the facts outlined herein and that I exercised my right to be represented by Counsel or agent in this matter.

DATED AT _____ THIS _____ DAY OF _____, 2023

(Please print)

(signature)

I have the authority to bind the corporation:
900917 ONTARIO LIMITED o/a AIRPORT HYUNDAI

By signature below, I acknowledge that I have read, understand, and agree with the facts outlined herein and that I exercised my right to be represented by Counsel or agent in this matter.

DATED AT _____ THIS _____ DAY OF _____, 2023

Mahadeen Hattim (signature)

By signature below the Registrar agrees, acknowledges, and understands that the facts of this matter are as set out by this Agreed Statement of Facts.

DATED AT _____ THIS _____ DAY OF _____, 2023

Maureen Harquail
Registrar, *Motor Vehicle Dealers Act, 2002*

Appendix "C"

DISCIPLINE COMMITTEE OF THE ONTARIO MOTOR VEHICLE INDUSTRY COUNCIL

IN THE MATTER OF A DISCIPLINE HEARING HELD PURSUANT TO THE MOTOR
VEHICLE DEALERS ACT, 2002, S.O. 2002, c.30, Sch. B

BETWEEN:

REGISTRAR, MOTOR VEHICLE DEALERS ACT, 2002

- and -

900917 ONTARIO LIMITED o/a AIRPORT HYUNDAI

- and -

MAHADEEN HATTIM

JOINT SUBMISSION ON PENALTY:

1. The Dealer agrees to pay a fine in the amount of \$3,500 no later than September 30, 2023.
2. The Dealer agrees to ensure that the Dealer representative identified at paragraph 9 of the Notice of Complaint dated February 28, 2023, completes the MVDA Key Elements course (the "Course"), at the Dealer's expense, no later than October 31, 2023.
3. Mahadeen Hattim agrees to successfully complete the Course no later than October 31, 2023.
4. The Dealer agrees to offer all current and future sales staff the opportunity to complete the Course. Current sales staff will be offered the Course no later than September 30, 2023. Future sales staff will be offered the Course within 90 days of being retained in this capacity. The Dealer will incur all costs associated with this. It is understood between the parties this clause does not apply to sales staff who have completed the Course after January 1, 2009, or who are otherwise required to do so pursuant to the Act.
5. The Dealer and Hattim agree to comply with the Act and Standards of Business Practice, as may be amended from time to time.

DATED AT _____ THIS _____ DAY OF _____, 2023

(signature)

I have the authority to bind the corporation:

900917 ONTARIO LIMITED o/a AIRPORT HYUNDAI

DATED AT _____ THIS _____ DAY OF _____, 2023

Mahadeen Hattim (signature)

DATED AT _____ THIS _____ DAY OF _____, 2023

Maureen Harquail

Registrar, *Motor Vehicle Dealers Act, 2002*