

IN THE MATTER OF THE SECURITIES ACT  
R.S.N.S. 1989, CHAPTER 418, AS AMENDED

- AND -

IN THE MATTER OF  
Russel Dan Keogan ("Keogan")

**STATEMENT OF ALLEGATIONS**

Staff of the Nova Scotia Securities Commission ("Commission") make the following allegations:

1. CST Consultants Inc. ("CST") is an extra provincial corporation located in Don Mills, Ontario and is registered as a Scholarship Plan Dealer with the Commission.
2. Keogan is a resident of Dartmouth, Nova Scotia.
3. Keogan held registration with the Commission as a salesperson for CST from December 12, 2002 until December 12, 2005.
4. In October, 2003, Keogan opened a CST scholarship plan account ("2003 Account") for Scott and Heidi Sim ("the Sims").
5. In August, 2005, Keogan opened a second CST scholarship plan account ("2005 Account") for the Sims.
6. In opening the 2005 Account, Keogan used the banking information on file from the application for the 2003 Account, and he signed each of the Sims' names to the application without authorization.
7. Keogan failed to deal fairly, honestly and in good faith with the Sims, thereby contravening s. 61 of the General Securities Rules.

DATED this 4<sup>th</sup> day of January, 2007.

\_\_\_\_\_"M. Lianne Bradshaw"\_\_\_\_\_  
M. Lianne Bradshaw  
Investigator, Compliance and Enforcement  
Nova Scotia Securities Commission