IN THE MATTER OF THE SECURITIES ACT R.S.N.S. 1989, C. 418, S. 135, AS AMENDED ("Act")

- and -

IN THE MATTER OF JEREMIAH DAVID LANGILLE formerly known as JERRY WAYNE LANGILLE ("Respondent")

<u>STATEMENT OF ALLEGATIONS</u> OF STAFF OF THE NOVA SCOTIA SECURITIES COMMISSION

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

- 1. The Respondent is a resident of Halifax Regional Municipality, Nova Scotia.
- 2. The Respondent changed his name from Jerry Wayne Langille to Jeremiah David Langille on September 24, 2004 under provisions of the *Change of Name Act*.
- 3. At all relevant times, the Respondent was a registrant of the Commission and therefore subject to Nova Scotia securities laws.
- 4. Beginning in July, 2001 the Respondent was employed as a Sales Person by Canadian Retirement Services ("CRS"), an investment firm registered with the Commission. Prior to July, 2001, the Respondent was employed as a Sales Person by Optifund Investments Inc. ("Optifund"), which was also an investment firm registered with the Commission.
- 5. While employed with CRS, the Respondent was the Recognized Agent, President and sole Director of L & L Financial Group Incorporated ("L&L") and Lanmark Investment Strategies ("Lanmark"). Both L&L and Lanmark are Nova Scotia incorporated companies.
- 6. Neither L&L nor Lanmark were registered with the Commission.
- 7. While employed with CRS and controlling L&L and Lanmark, the Respondent:
 - (a) advised and encouraged clients to sign blank Letters of Direction ("Letters");
 - (b) effected transfers of client accounts from other investment representatives to the Respondent, without the permission or knowledge of clients by using the Letters;
 - (c) converted client funds for his own personal and or corporate use and enrichment without the explicit pre-approval and competent knowledge of his clients;
 - (d) provided false and misleading portfolio statements to clients;

- (e) used his position as a financial advisor to his own advantage and enrichment;
- (f) dealt with clients in a manner which was not fair, honest, in good faith, nor in their best interests.
- 8. The Respondent was terminated by CRS on July 12, 2002. A uniform termination notice was forwarded to the Commission on that same date.
- 9. The Respondent acted in a manner which contravened sections of 44(1)(b), 44(2), and 44A(2) of the Act and sections 30(1), 31(1)(a), 33(1), 36, 40(1), 40(2) and 61 of the General Securities Rules and in a manner contrary to the public interest.

DATED this 20th day of April, 2006.

_____"Abel H. Lazarus"_____ Abel H. Lazarus, CA, CFE Investigator Nova Scotia Securities Commission.