

I am BIA counselor as of March 10, 2016. I have read through the proposed directives and there is only one main concern that I have.

In the proposed directives you are grouping financial literacy and credit rebuilding in with the Third-Party Debt Advisors. I work with a trustee firm in Calgary a couple times a week doing the counseling sessions on their behalf. My full-time business is teaching Canadians how to improve their credit scores and removing errors of their credit reports. I understand that there are many credit rebuilding companies that deal with debt as well. My business, eCredit Fix is unique in that it only offers services for improving credit scores and removing errors from credit reports. I don't see how my services would fall under the title of "conflict of interest". Paragraph 18(2) would further demonstrate that eCredit Fix services and business model do not fall under your "conflict of interest" label. "Where the insolvency counselor or an organization or person which the insolvency counsellor has a relationship, has in the **past** or may **during** the administration of the individual bankrupt's insolvency proceeding, receive any form of payment or remuneration directly or indirectly from the individual bankruptcy or consumer debtor, for any financial advisory product or service, other than prescribed fees paid to the LIT in respect of insolvency counselling. I get paid a portion of the prescribed fees when I conduct a counseling session. eCredit fix services only occur after someone has completed a bankruptcy or proposal so I would never be paid anything **before** or **during** the insolvency proceedings.

Under the definition of "Third-party Debt Advisor" it states "such services may include, but are not limited to: **financial evaluations, representation**, restructuring services, credit rebuilding, loans in various forms, or insurance.

The definition of "Third-party Debt Advisor" is too broad. Wouldn't financial evaluations and representations would also include accountants. Net worth statements, filing taxes on behalf of a consumer, financial literacy or providing tax advice are all services that are commonly provided by an accountant. Credit rebuilding, or loans could also relate to Mortgage Brokers or someone who works with a bank. I don't see how financial evaluations, representation, or credit rebuilding would be a conflict of interest. Based on your research it is third-party debt advisors and companies that creating the conflict. So make the definition any company that offer services such as debt restructuring or debt consultations.

In addition, there seems to be implied that all companies that would be labeled "Third-party Debt Advisor", are receiving or giving referrals. To date I have not taken any client that I previously had done a counseling session for. The issues mentioned email feels like an attempt by the OSB to paint those in financial services as the conflict when many would only be trying to help Canadians. If you have any questions please feel free to contact me.

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