

FP Canada Standards Council™

and

Sarah Chilton (nee Davie), QAFP™

STATEMENT OF ALLEGATIONS

THE QAFP™ PROFESSIONAL

1. Sarah Chilton (“Ms. Chilton” or “the Respondent”) became certified as a QAFP™ certificant on February 1, 2020. Ms. Chilton completed the CFP® Professional Education Program delivered by the FP Canada Institute™ (the “Institute”), in April 2021. As of the date of this Statement of Allegations, Ms. Chilton is a QAFP professional in good standing. She does not have a discipline history with the FP Canada Standards Council™ (the “Standards Council”).
2. With the exception of a two-month period in 2021, Ms. Chilton has been and remains employed as an Associate Financial Advisor at Raymond James Ltd. (“Raymond James”) since November 2014.
3. Ms. Chilton resides in Victoria, British Columbia.

HISTORY OF THE PROCEEDINGS

4. On June 16, 2021, a representative of Raymond James advised the Institute that they were in possession of documents showing that two of their employees registered in the CFP® Professional Education Program may have engaged in academic misconduct. Specifically, the firm was in possession of documents which showed that Ms. Chilton’s colleague emailed two (2) assignments and the colleague’s final assessment, to Ms. Chilton.
5. On August 25, 2021, following a review of the matter, the Institute determined that Ms. Chilton engaged in conduct that constituted a violation of Article 6.4 of the *FP Canada Institute Student Handbook* in that she engaged in academic misconduct by, amongst other things, plagiarizing another student’s work. The Institute referred the matter to the Standards Council.

6. Being found to have engaged in academic misconduct is a presumptive bar to continued certification pursuant to the *Fitness Standards* contained in the *Standards of Professional Responsibility*.
7. In accordance with Article 4.7 of the *FP Canada Standards Council Disciplinary Rules and Procedures ("DRP")*, Ms. Chilton was afforded the opportunity to submit a Request for Reconsideration and ask that she be allowed to maintain her certification. Ms. Chilton submitted a Request for Reconsideration dated October 19, 2021.
8. The Standards Council instructed an investigation into Ms. Chilton's conduct on November 19, 2021. The investigation revealed, amongst other things, that a total of six (6) assignments and the final assessment were shared with Ms. Chilton and that she was not forthright with the Institute when they were conducting their review.
9. On March 22, 2022, the Conduct Review Panel ("CRP") convened and referred this matter to a Hearing Panel.

NOTICE

10. Further to the direction of the CRP, and in accordance with Article 5.1 of the *DRP*, I hereby give notice of the Standards Council's request that a hearing date be set with respect to the matter identified as: *FP Canada Standards Council™ and Sarah Chilton (nee Davie), QAFP™*.
11. The Standards Council requests that the hearing in respect of this matter be held in writing.

APPLICABLE STANDARDS

12. Ms. Chilton's conduct occurred between April 2020 and July 2021 and accordingly, her conduct is governed by the *Standards of Responsibility* in force between January 1, 2020 and April 30, 2022. In addition, the finding of academic misconduct by the Institute on August 25, 2021 triggered a presumptive bar to Ms. Chilton's continued certification. Accordingly, a presumptive bar to continued certification was triggered in relation to Ms. Chilton's conduct pursuant to the *Fitness Standards* in force between July 1, 2021 and April 30, 2022.
13. The applicable Principles, Rules of Conduct and Fitness Standards are as follows:

<p><i>Standards of Responsibility (July 1, 2021 to April 30, 2022)</i> Fitness Standard</p>	<p>Each of the below is a presumptive bar to new, continued or reinstated certification and may, following review, result in a finding that an individual should be denied new or continued certification by FP Canada.</p> <p>Being found by an FP Canada-Approved education provider to have breached the education provider's code of ethics or</p>
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	code of conduct, and/or to have engaged in academic misconduct.
Standards of Professional Responsibility (January 1, 2020 to April 30, 2022)	<p>Principle 2: Integrity - A Certificant shall always act with integrity. Integrity means rigorous adherence to the moral rules and duties imposed by honesty and justice. Integrity requires the Certificant to observe both the letter and the spirit of the Code of Ethics.</p> <p>Principle 8 (Professionalism) - A Certificant shall act in a manner reflecting positively upon the profession. Professionalism refers to conduct that inspires confidence and respect from clients and the community, and embodies all of the other principles within the Code of Ethics.</p> <p>Rule 1 - A Certificant shall not engage in or associate with individuals engaged in conduct involving dishonesty, fraud, deceit or misrepresentation, or knowingly make a false or misleading statement to clients or any other parties.</p> <p>Rule 2 - A Certificant shall not engage in any conduct that reflects adversely on his or her integrity or fitness as a Certificant, the certification marks or the profession.</p>

ALLEGATIONS

The Standards Council makes the following allegations against the Respondent:

1. As a result of the Respondent being found by an FP Canada-Approved education provider, on August 25, 2021, to have engaged in academic misconduct, the Respondent is presumptively barred from continued certification pursuant to the *Fitness Standards* in the *Standards of Responsibility* in force between July 1, 2021 and April 30, 2022;
2. Between April 2020 and February 2021, the Respondent engaged in academic misconduct by plagiarizing another student's work in contravention of section 6.4 of the *FP Canada Institute Student Handbook* in place at the relevant time, and as such, she failed to act with integrity and professionalism and engaged in conduct which reflects adversely on the certification marks and the profession, contrary to Principles 2 and 8 and Rule 2 of the *Standards of Responsibility* in force between January 1, 2020 and June 30, 2021.

3. Between June 14, 2021 and July 19, 2021, by failing to be forthright with the Institute when they were conducting their review, the Respondent engaged in conduct involving dishonesty, deceit or misrepresentation, or knowingly making false or misleading statements to the Institute, failed to act with integrity and engaged in conduct which reflects adversely on the certification marks and the profession, contrary to Principle 2 and Rules 1 and 2 of the *Standards of Responsibility* in force between January 1, 2020 and April 30, 2022.

Dated the 6th day of May, 2022

"Tamara Center"

Tamara Center
Director, Professional Conduct and Enforcement
Counsel to the FP Canada Standards Council™