

FP CANADA STANDARDS COUNCIL™

AND

~~SUSANNE~~ SUZANNE (SUZIE) LEE GRAHAM, CFP® a.k.a.
SUZANNE (SUZIE) COULTER

AMENDED STATEMENT OF ALLEGATIONS

I. THE CERTIFICANT

1. ~~Susanne Suzanne~~ (Suzie) Lee Graham a.k.a Suzanne (Suzie) Coulter (“Ms. Graham” or the “Respondent”) was certified by the Financial Planning Standards Council®, now FP Canada™, as a CERTIFIED FINANCIAL PLANNER® certificant on January 1, 2008. Ms. Graham has consistently renewed her certification and as of the date of this Statement of Allegations, Ms. Graham is a CFP professional in good standing. Ms. Graham does not have a prior discipline history with the FP Canada Standards Council™ (the “Standards Council”).
2. Ms. Graham has worked in financial services since March 2008. Since 2018, Ms. Graham has been employed by IG Wealth Management Inc. as a “Certified Financial Planner”. She resides in Oakville, Ontario.
3. On April 5, 2025, Ms. Graham got married and subsequently changed her legal name to her married name, i.e. Suzanne Coulter.

II. BACKGROUND OF THE PROCEEDING

4. ~~This matter came to the attention of the~~ The Standards Council commenced its review of this matter in February 2024. on September 4, 2024, The review included information shared between ~~when~~ the Ontario Securities Commission (“OSC”) and alerted FP Canada pursuant to the Memorandum of Understanding between the two organizations. staff to a matter involving Ms. Graham.
5. Standards Council staff independently obtained and reviewed insolvency documents concerning Ms. Graham from the Office of the Superintendent of

Bankruptcy. Upon review, staff learned that Ms. Graham had entered into a Consumer Proposal on June 24, 2022, which ~~is~~ was scheduled to be discharged on June 24, 2027.

6. Ms. Graham failed to disclose her Consumer Proposal to FP Canada within fifteen (15) days of June 24, 2022 (i.e., by July 9, 2022), as required, or at any time prior to ~~September~~ February 2024, when this matter came to FP Canada's attention. As a result, Ms. Graham prevented FP Canada from considering her fitness for continued certification for over 1.5 ~~two (2)~~ years (i.e., between July 2022 and ~~September~~ February 2024).
7. Ms. Graham also misled FP Canada on her 2023/2024 CFP Renewal Application Form, filed March 28, 2023, and on her 2024/2025 CFP Renewal Application Form, filed March 25, 2024, when she answered "no" to the following Declaration, when she ought to have answered "yes":

"Since signing your last application for certification with FP Canada, have you filed or declared bankruptcy, or entered into a consumer proposal?"
8. Pursuant to the *FP Canada Standards Council Fitness Standards*, being subject to a Consumer Proposal is a presumptive bar to an individual becoming or remaining certified with FP Canada.
9. By letter dated October 29, 2024, Standards Council staff notified Ms. Graham that the Consumer Proposal triggered a presumptive bar to remaining certified by FP Canada and afforded Ms. Graham the opportunity to submit a Request for Reconsideration and request that the presumptive bar to continued certification be displaced.
10. Ms. Graham took advantage of this opportunity and submitted a Request for Reconsideration on December 4, 2023 as well as further correspondence and representations thereafter.
11. On March 18, 2025, the Conduct Review Panel ("CRP") convened and referred the allegations set out herein to a Hearing Panel.
12. On or about June 25, 2025, Ms. Graham satisfied the balance of her Consumer Proposal and the Insolvency Trustee issued a Certificate of Full Performance of Proposal. As the presumptive bar applies to Consumer Proposals which are current, the presumptive bar to Ms. Graham's certification no longer applied as of the discharge date.

III. NOTICE

13. Further to the direction of the CRP, and in accordance with Article 5.1 of the *FP Canada Standards Council Disciplinary Rules and Procedures* (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 ~~Susanne~~ Suzanne (Suzie) Lee Graham, CFP® a.k.a. Suzanne (Suzie) Coulter.*

14. The Standards Council requests that the hearing be held in writing.

IV. APPLICABLE STANDARDS

15. ~~As Ms. Graham entered into a Consumer Proposal in June 2022 which is continuing as of the date of this Statement of Allegations,~~ Ms. Graham's conduct relating to her failure to report to, and mislead, FP Canada is governed by the *Standards of Professional Responsibility* in force commencing in May 2022 and currently in force. The applicable Principles and Rules of the *Standards of Professional Responsibility* are attached at **Appendix "A"**.

V. ALLEGATIONS

The Standards Council makes the following allegations against the Respondent:

1. ~~By being subject to a Consumer Proposal, the Respondent is presumptively barred from continued certification with FP Canada.~~
2. Between July 2022 and May 2024, the Respondent failed to report the Consumer Proposal she had entered into to FP Canada within fifteen (15) days, in breach of Rule 33(b) of the *Standards of Professional Responsibility* in place between May 2022 and May 2024.
3. ~~Between June and September 2024, the Respondent failed to report the Consumer Proposals she had entered into to FP Canada within thirty (30) days, in breach of Rule 35(b) of the *Standards of Professional Responsibility* in place between June 2024 and those currently in force.~~
4. On March 28, 2023 and on March 25, 2024, the Respondent misled FP Canada on her 2023/2024 and 2024/2025 CFP Renewal Application Forms, respectively, by falsely attesting that she was not subject to a Consumer Proposal, notwithstanding that she was in a Consumer Proposal, in breach of Rules 33(a) and 37 of the *Standards of Professional Responsibility* in place between May 2022 and May 2024.
5. ~~In addition, and/or in the alternative, the Consumer Proposal reflects adversely on the Respondent's integrity or fitness as a Certificant, the certification marks or the profession; in breach of Principle 2 and Rule 2 of the *Standards of Professional Responsibility* commencing in June 2022 and those currently in force.~~

Dated: ~~April 22~~ July 14, 2025



Tamara Center

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

APPENDIX “A”

Standards of Professional Responsibility for CFP Professionals and QAFP Professionals from May 2022 – to May 2024

~~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:~~

- ~~• Currently in personal Bankruptcy proceedings or subject to a Consumer Proposal~~

~~“Consumer Proposal” means an offer made by a debtor under the Bankruptcy and Insolvency Act to modify their payment to a creditor. Such a proposal must be completed within five years.~~

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~~

~~**Rule 2:** A Certificant shall not engage in any conduct, including conduct outside of their practice, that reflects adversely on their integrity or fitness as a Certificant, the FP Canada Certification Marks or the profession.~~

Rule 33: A Certificant shall meet all FP Canada requirements for continued certification, including:

- Making full and accurate Legal Declarations when completing their Annual Renewal Form. Reportable items are outlined in the “Declarations and Professional Obligations” section of the certification renewal form and include consumer proposals and bankruptcies; involvement in civil proceedings; criminal convictions; court orders; and investigations or decisions by professional bodies and regulatory/licensing bodies;
- Advising FP Canada, in writing, of any changes to prior legal Declarations within 15 days of becoming aware of new information;

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Rule 37: A Certificant shall not make any false or misleading statement to FP Canada, the FP Canada Standards Council or any other department or division of FP Canada.

~~Standards of Professional Responsibility for CFP Professionals and QAFP Professionals from June 2024 to Present~~

~~Fitness Standards~~

~~[No Material Change]~~

~~Principle 2: Integrity~~

~~[No Material Change]~~

~~Rule 2~~

~~[No Material Change]~~

~~Rule 35:~~ A Certificant shall meet all FP Canada requirements for continued certification, including:

- ~~b) Advising FP Canada, in writing, of any changes to prior Legal Declarations as soon as possible but no later than within 30 days of becoming aware of new information;~~

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