

**CITATION: Campbell (Re), 2025 BCRMB 12**

Date: 2025-11-20

File # INV23.251.44354

**BC FINANCIAL SERVICES AUTHORITY**

**IN THE MATTER OF THE *MORTGAGE BROKERS ACT*  
RSBC 1996, c 313 as amended**

**AND**

**IN THE MATTER OF**

**GRAHAM CAMPBELL  
(503648)**

**CONSENT ORDER**

**(Pursuant to sections 8 (1.2) of the *Mortgage Brokers Act*)**

**[This Order has been redacted before publication.]**

**WHEREAS** Graham Campbell, ("Mr. Campbell") was at all material times registered as a submortgage broker under the *Mortgage Brokers Act*, RSBC 1996, c 313 ("MBA");

**AND WHEREAS** the Registrar of Mortgage Brokers (the "Registrar") issued a Notice of Hearing to Mr. Campbell, on June 18, 2025 ("Notice of Hearing");

**AND WHEREAS** the following agreement has been reached between Mr. Campbell and the staff of the Registrar ("Staff");

**AND WHEREAS** the Registrar agrees to the following terms of a consent order:

**I. FINDINGS**

The Registrar makes the following findings against Mr. Campbell, and Mr. Campbell accepts the following findings made against him:

1. While registered as a submortgage broker, Mr. Campbell conducted mortgage business in British Columbia in a manner prejudicial to the public interest contrary to section 8(1) of the MBA when he:
  - a. misrepresented to his client that he had secured a financing rate hold with a lender when he had not; and
  - b. altered a pre-approval certificate setting out the lender's rate hold for his client and provided it to his client as if it were genuine.

## **II. ORDERS AND PENALTY**

Pursuant to section 8(1.2) of the MBA, Mr. Campbell hereby consents to, and the Registrar hereby makes the following orders:

1. Pursuant to section 8(1.2)(b) of the MBA, Mr. Campbell shall pay an administrative penalty of \$35,000 within the time period directed by the Registrar;
2. Pursuant to section 6(9) of the MBA, Mr. Campbell shall pay investigation costs in the amount of \$2,500 within the time period directed by the Registrar; and
3. All amounts must be made by cheque, bank draft, or money order, payable to the BC Financial Services Authority, and all amounts not paid in accordance with the terms of this Order will represent a debt owing and be subject to interest pursuant to the *Financial Administration Act* RSBC 1996, c.138.

## **III. AGREED FACTS**

As a basis for this Consent Order, Mr. Campbell acknowledges the following facts as correct and makes the following admissions:

1. Mr. Campbell has been registered as a submortgage broker since May 23, 2019.
2. At all relevant times Mr. Campbell was registered with Homeline Financial Services Ltd. / Dominion Lending Centres Homeline Mortgages ("Homeline").
3. In or about early February 2023, first-time home-buyer DK began a property search for a home. DK sought the services of Mr. Campbell for financing options.
4. Mr. Campbell told DK he could apply for rate holds with lenders on her behalf.
5. In or about late April 2023, Mr. Campbell told DK, based on his belief and understanding at that time, that he secured a rate hold for a 5-year term at 4.89% with [Lender 1] ("Lender 1") expiring on August 23, 2023.
6. On July 14, 2023, DK entered into a contract for purchase and sale to purchase a property located at [Property 1], Kelowna BC (the "Property") for a purchase price of \$480,000, with a \$10,000 deposit due within 24 hours of acceptance, a completion date of August 22, 2023, and possession date of August 23, 2023. The contract was subject to financing, and the subject removal date was July 28, 2023.
7. Shortly thereafter, Mr. Campbell realized that due to an administrative oversight, DK's rate hold application to [Lender 1] had not been submitted. He realized this after reviewing correspondence from [Lender 1] relating to another client's file.
8. Following this realization, Mr. Campbell continued to have discussions with DK regarding the [Lender 1] rate hold. He advised DK that [Lender 1] required additional financial information, communicating with her as though DK's file was under review by [Lender 1]. He did this knowing it was not true, and he did not tell DK that the rate hold application had not been submitted.
9. While DK endeavored to obtain information she believed was being requested by [Lender 1], Mr. Campbell confirmed a financing approval from the other lender with the 5.14% rate hold. He also suggested that she consider requesting an extension for subject removal.

10. On or about July 28, 2023, DK signed the subject removal regarding the Property relying [o]n financing approval from the other lender.
11. Under the belief that [Lender 1] would not honour their earlier rate hold, DK asked Mr. Campbell for a copy of the [Lender 1] pre-approval certificate.
12. On July 31, 2023, Mr. Campbell provided DK with a pre-approval certificate dated April 25, 2023 bearing mortgage number [redacted] and bearing DK's name. Mr. Campbell had altered an existing pre-approval certificate respecting a different client to make it appear as if it was related to DK.
13. On or about August 2, 2023, DK contacted [Lender 1] seeking clarification regarding her pre-approval and the rate hold of 4.89% that was due to expire on August 23, 2023. As part of her inquiry, DK provided the altered [Lender 1] pre-approval certificate bearing number [redacted] obtained from Mr. Campbell and text communications she had with Mr. Campbell regarding her pre-approval.
14. [Lender 1] informed DK there was no record of any mortgage application in her name.
15. [Lender 1] observed the mortgage reference number [redacted] and determined that it belonged to another client of Mr. Campbell's.
16. [Lender 1] contacted Homeline and advised it would no longer accept mortgage applications from Mr. Campbell.
17. On August 4, 2023, BCFSA received a complaint from [Lender 1] alleging that Mr. Campbell altered a [Lender 1] pre-approval letter leading his client to believe she was pre-approved with [Lender 1] when she was not.
18. DK obtained financing from the other lender, and Mr. Campbell voluntarily paid DK to cover the difference between the promised [Lender 1] rate and the new rate with the other lender, which was in excess of the gross commission before brokerage splits and expenses, totaling approximately \$5,500. This was done prior to Mr. Campbell being contacted by BCFSA investigators.
19. In November 2023, Mr. Campbell sent an email to CK acknowledging his mistake and offering to do more to rectify the situation.
20. Mr. Campbell told BCFSA that he thought he had sent the rate hold submission to [Lender 1] but realized after the fact that, by inadvertent omission or technical error, he had failed to submit the application. He told BCFSA that he panicked and attempted to find a solution for DK by securing financing with another lender at a slightly higher rate. He admits that his actions in misrepresenting the rate hold after realizing he had not secured it, and subsequently altering a pre-approval certificate, were a complete lapse in judgment on his part.
21. Mr. Campbell fully cooperated with BCFSA's investigation and has demonstrated accountability and remorse for his conduct.
22. Mr. Campbell has since implemented updated administrative processes and is operating with improved dedicated compliance support.
23. Mr. Campbell does not have any discipline history with the Registrar.

#### **IV. WAIVER**

Mr. Campbell waives his right to a hearing under sections 4 and 8 of the MBA and waives his right to appeal under section 9 of the MBA.

Approved as to form and content by:

"Original signed by Graham Campbell"

\_\_\_\_\_ this 18 day of November, 2025.

Graham Campbell

"Original signed by Catherine Davies"

\_\_\_\_\_ this 18th day of November, 2025.

Catherine Davies

Legal Counsel for the Staff of the  
Registrar of Mortgage Brokers

Issued this 19th day of November, 2025 at Vancouver, British Columbia.

"Original signed by Jonthan Vandall"

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Jonathan Vandall

Acting Registrar of Mortgage Brokers  
Province of British Columbia