



MINISTRY OF TRANSPORTATION

~~PROCEDURES FOR
PROCESSING THE
CONSULTANT'S
INFRACTION REPORT~~



MINISTRY OF TRANSPORTATION

PROCEDURES FOR
PROCESSING THE
ENGINEERING

SERVICE PROVIDER INFRACTION REPORT

Qualification Committee

September 2015

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MINISTRY OF TRANSPORTATION ONTARIO

PROCEDURES FOR PROCESSING THE CONSULTANT'S ENGINEERING SERVICE PROVIDER INFRACTION REPORT

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1. PURPOSE and INTENT

The purpose of these procedures is to provide an administrative routine process for handling the Infraction Report. ~~The~~ These procedures apply to engineering, and define the roles of the Engineering Service Providers (includes including Engineering Consultants, Construction Contract Administration Consultants, and Laboratories) and the Ministry of Transportation (“MTO”, “ministry”). The intent is to ensure that Infraction Reports are issued in circumstances that are appropriate, and are processed in a timely manner while respecting the rights and obligations of all parties. ~~These procedures supersede those contained in other ministry guides.~~

The intent of the infraction process is to provide the Engineering Service Provider (Service Provider) with a series of progressive /staged warnings, and the opportunity to correct a deficiency, before an Infraction Report is issued unless the situation is sufficiently serious to warrant the immediate issuance a Warning or of an Infraction Report without prior verbal or written notification or warning.

In keeping with the progressive warning principle approach, if a performance or behaviour issue occurs, the matter persists after one or more ministry agreement administrator should give a verbal warnings have been given, the matter or written notification, with initial preference given to verbal warning.

The formal written notice, if issued, will be communicated to the Service Provider’s Key Contact listed in RAQS and to the Service Provider’s Project Manager by way of a formal written notice, and include including the following information:

- (a) Description of the subject activity, and nature of the concern.
- (b) Date and location of the incident, as applicable or issue.
- (c) Assignment Agreement* terms and conditions/clause(s), as applicable) with which the Service Provider is not complying.
- (d) Specified time frame in which corrective action is to be taken, as applicable.
- (e) State that the matter could lead to further administrative action such as the issuance of a Warning of Infraction Report or an Infraction Report, if applicable.
- (f) Other information as applicable that is relevant to the matter such as photographs.

~~Nevertheless, situations~~ Situations may arise that are sufficiently serious to warrant the immediate issuance of a Warning of Infraction Report or an Infraction Report without any prior warning verbal or written warnings or notifications, such as wilful a wilful violation of the Assignment Agreement, severe and imminent risk to ~~the~~ workers and/or public safety or the natural environment resulting from the Service Provider’s failure to exercise due diligence and properly control activities related to the services; contractual breaches where the ministry could be held liable for third party damages due to safety or environmental impacts; offering inducements to ~~the MTO Project Manager/Agreement Administrator~~ Contractor staff or ministry representatives; serious defects in the quality of the services; failure to meet the requirements of the contract Contract; breaches to the rules governing tendering; or other appropriate serious situations.

* Where, Assignment Agreement refers to the executed agreement resulting from this Request for Proposal/Request for Quotation signed by the ministry and the Service Provider.

Joint Ventures

A Service Provider Joint Venture is treated as an ~~an Equal~~ Partnership of two (2) or more firms. If there is a consortium or a legal partnership involved, each partner will be impacted by the ~~infraction~~ Infraction Report, if the Committee decides to impose sanctions.

Application of the infraction process and decisions are to be guided by the following principles:

- i. Applied in circumstances that are appropriate and in a manner that respects the rights and obligations of all parties.
- ii. Support a fair, equitable and transparent environment for tendering and delivery of the services.
- iii. Support a strong working relationship between all parties, based on mutual respect, the principles of fairness, equity, transparency and accountability.
- iv. The infraction sanction (“sanction”) process is not to be used ~~as a means to~~ negotiate matters in dispute under the ~~contract~~ Contract.
- v. Promote the consistent application of the infraction process by ~~ministry~~ the ministry staff at the project level and across the ~~ministry~~ ministry.

2. WARNING OF INFRACTION AND INFRACTION REPORT

2.1. Warning of Infraction Reports

If ~~changes~~ appropriate corrective actions are not ~~forthcoming~~ taken after issuance of ~~the above noted~~ verbal and written warning, then the Engineering Service Provider is issued a ~~formal~~ written Warning of Infraction Report. ~~A copy of the (Form PH-EC-901). The form is shown in Appendix I. The available on the MTO Technical Publications website (TechPubs).~~ The Engineering Service Provider Warning of Infraction Report and all accompanying documents are electronically transmitted to the Engineering Service Provider through Registry, Appraisal & Qualification System (“RAQS”~~”~~), or via email with a copy to the Engineering Service Provider’s ~~corporate office~~ key contact in RAQS, a copy to the Engineering Service Provider’s Project Manager, and a copy sent to the Secretary, Qualification Committee (“Secretary”~~”~~) via email at qualificationcommittee@ontario.ca. This serves to put the Engineering Service Provider on notice that, should the problems continue, an Infraction Report will be issued.

The Engineering Service Provider may, and is encouraged to, request a formal meeting to discuss the Warning of Infraction Report. If the meeting is requested by the Engineering Service Provider, then in addition to the MTO Project Manager/Agreement Administrator, the ~~ministry~~ ministry will arrange for the ~~Regional/Office Manager~~ Manager and the MTO Project Manager/Agreement Administrator to attend the meeting. The meeting will be scheduled promptly (no more than ~~ten (10) business days~~ Business Days from the day meeting is requested), ~~so as~~ to ensure a timely discussion ~~of~~ on the matter of concern. If the situation giving rise to the Warning of Infraction Report is not corrected or adequately addressed, an

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Infraction Report may be issued regardless of whether a formal meeting has been held or not.

A Warning of Infraction Report that is not followed by an Infraction Report is not considered by Qualification Committee (“Committee”). A Warning of Infraction Report cannot be withdrawn once it is issued.

2.2. Infraction Reports

Infraction Reports are issued only to the prime Engineering Service Provider firm, or all firms involved in the joint venture.

The circumstances that can lead to the issuing of an Infraction Report vary widely with respect to both the nature of the incident and its seriousness/severity. However, an Infraction Report will normally only be issued for a serious incident (or multiple occurrences of similar incidents) and are used to record breaches of the Assignment Agreement including:

- ~~i. Failure to comply with the terms and conditions of the Assignment;~~
- ~~ii. Failure to provide adequate organization, co-operation, personnel or equipment to deliver the services;~~
- ~~iii. Failure to comply with the MOL / Occupational Health and Safety requirements;~~
- ~~iv. Delayed delivery / failure to complete the Assignment or key components in a timely manner.~~

(A) Quality of services rendered by Engineering Service Provider (or sub-Engineering Service Provider) is found to be in major violation of the Agreement.

~~v. (B) Failure to abide by the tendering requirements;~~

(C) Failure to provide adequate organization, cooperation, personnel or equipment to perform the services.

~~vi. (D) Tender declarations that are incomplete, inaccurate, or are not adhered to;~~

(E) Failure to discharge liabilities.

~~vii. (F) Offering inducements to the MTO Project Manager/Agreement Administrator;~~

~~Willful (G) Failure to comply with terms and conditions of the Agreement.~~

~~viii. (H) Willful disregard of written instruction to correct/adjust the services or practices, which are specified under the Assignment, and which, if not corrected, may cause a reportable event to the Ministry of Labour, Ministry of Environment, Ministry of Natural Resources and Forestry, Fisheries and Oceans Canada, Conservation Authorities or other governing/regulating authority;~~

~~ix. (I) Serious defects in quality of the services and deliverables;~~

~~x. (J) Severe contractual/contract breaches, including default;~~

(K) Failure to complete the Agreement deliverables in a timely manner.

- (L) Failure to follow ~~direction~~instructions given by the MTO Project Manager/Agreement Administrator;
xi. _____ Administrator;
(M) Fraud, Collusion, Conflict of Interest, Deceit or Falsifying Documents
xii. (N) Other circumstances which may lead to a deteriorated working relationship.

An Infraction Report should not be issued in lieu of matters more appropriately recorded in the Consultant Performance Appraisal.

3. PROCEDURES FOR COMPLETING, ISSUING, AND RESPONDING TO AN INFRACTION REPORT

3.1. Completing the Infraction Report

The decision ~~whether~~ to issue an Infraction Report is made within the ministry's issuing office and will normally involve the MTO Project Manager/Agreement Administrator and ~~Regional~~ Office Manager.

If an Infraction Report is required, it should be issued in a timely fashion, and preferably within ~~fifteen (15) business days~~ Business Days of the incident. The ~~Consultant's~~ Engineering Service Provider Infraction Report (Form PH-EC-900) is to be completed in accordance with the instructions contained on ~~the~~ Owner standard form. ~~A copy of the form is shown in Appendix II. PH-EC-900 available on TechPubs.~~ All supporting information must be attached. It is particularly important to state how the Assignment Agreement was violated, and the actions taken by the ~~ministry~~ ministry and the Engineering Service Provider. Where possible, the impact costs of the violation to the ~~ministry~~ ministry should be given. Note that for safety and environmental violations, the impact statement may be descriptive. All information must be factual. The form is signed by the person completing the ~~infraction~~ Infraction Report (the MTO Agreement Administrator) and countersigned by the ~~Regional~~ Office Manager.

An Infraction Report is not to be used as an instrument of negotiation and cannot be withdrawn once it has been signed by the ~~Regional~~ Office Manager.

3.2. Issuing the Infraction Report

The Infraction Report will be issued through Contract Management System (CMS). The Infraction Report, and a copy of all supporting information, must also be given to the Engineering Service Provider's Key Contact listed in RAQS and Project Manager, in a mandatory formal meeting.

~~The ministry's~~ At the meeting, the ministry's representative ~~should~~ must explain the reasons for issuing the Infraction Report and advise the Engineering Service Provider that any response must be received by the Secretary within ~~fifteen (15) business days~~ Business Days of the receipt of the Infraction Report, with a copy to the applicable ministry's issuing office. A copy of the Infraction Report, supporting documentation, and minutes of the meeting with the Engineering Service Provider are to be sent to the Secretary ~~-~~ (qualificationcommittee@ontario.ca).

The only exception to holding a mandatory formal meeting is when the Engineering Service Provider's designated contact is not available. In this case, the completed form will be issued in Contract Management System (CMS) or RAQS or via email with a copy to the Engineering Service Provider's ~~corporate office.~~ Project Manager. The Engineering Service Provider can request a formal meeting with the ~~ministry's regional~~ ministry's representative following the issuance of the infraction.

In the event that a formal mandatory meeting was not held after the Infraction Report has been received by the Engineering Service Provider, the ~~ministry~~ ministry must initiate a telephone call to:

- i) verify that the ~~infraction report has been~~ Infraction Report was received,
- ii) define the start of the ~~fifteen (15) business day~~ Business Day period for the Engineering Service Provider's response,
- iii) answer any questions from the Engineering Service Provider with respect to the Infraction Report. Minutes of the call must be written, and a copy must be provided to the Engineering Service Provider and the Secretary.

Once the Infraction Report has been issued, the Secretary will have an independent ~~8~~ 8

investigation of the Infraction Report conducted and produce the Statement of Facts by a person with no direct prior involvement with the matter. ~~The Committee decides the outcome of the Infraction Report.~~

3.3. Engineering Service Provider's Response to the Infraction Report

The Engineering Service Provider has the option, and is encouraged, to respond to the Infraction Report by sending a written response to the Secretary (qualificationcommittee@ontario.ca) and a copy to the issuing office Manager, within ~~fifteen (15) business days~~ Business Days of the site meeting (or, if there was no site meeting, within ~~fifteen (15) business days~~ Business Days of the telephone call ~~which followed~~following the courier or registered mail delivery). The ~~addresses of ministry offices are given in Appendix III. The ministry~~ministry requires that responses be factual and supported by documentation. Failure to respond will be taken as agreement with content of the Infraction Report.

4. STATEMENT OF FACTS

The Secretary is responsible for the investigation of the incident(s) that led to the issuing of the Infraction Report, and the preparation of a Statement of Facts.

The Statement of Facts summarizes the facts of the infraction as understood by the Secretary. Both the Regionrespective Office Manager and the Engineering Service Provider can provide comments in writing with respect to the Statement of Facts. The Statement of Facts, the comments from the ConsultantEngineering Service Provider and the comments from the Regionministry's issuing office are to be presented to the Committee.

A copy of the Statement of Facts and all accompanying documents is provided to the Engineering Service Provider and the ministry'sministry's lead office with an invitation to review and comment on it. Any comments must be received, in writing, by the Secretary within the period specified in the covering letter (not normally less than ~~ten~~fifteen (105) business days).

The Statement of Facts, Infraction Report, Engineering Service Provider Response, ministry'sministry's issuing office Response and all accompanying/supporting documents provided to the Committee will also be provided to the Engineering Service Provider and Office Manager, including changes or additions made prior to being presented to the Committee.

The Engineering Service Provider can request a formal extension, to the Secretary, prior to the due date of the response with justification as to why more time is required for the response. The ministryministry will review the request, and based on the information provided by the ConsultantEngineering Service Provider to support the request, will either grant an extension, detailing the duration of the extension, or deny the extension. The ministryministry will not unreasonably deny aConsultant'san Engineering Service Provider's request for an extension to the time giving consideration to the information provided by the ConsultantEngineering Service Provider and the nature and complexity of the matter.

5. ROLE OF QUALIFICATION COMMITTEE

All Infraction Reports are considered by the Committee, ~~and which~~ will normally be placed on the agenda for the next scheduled meeting following the deadline for the receipt of responses to the Statement of Facts.

The Service Provider will have an opportunity to request one meeting, to make an oral presentation to the Committee regarding the infraction. Such meeting shall occur prior to any decision made by the Committee. The Secretary will inform the Service Provider of the date, time, and location of the meeting. ~~The meeting will usually be held in the MTO St. Catharines Office.~~ The Service Provider's delegation at the meeting shall be limited to ~~three~~ (3) persons.

That meeting will provide an opportunity for the Service Provider to be present and to listen to the information about the Infraction Report that is presented to the Committee by the Secretary (or designee). At the same meeting, the Service Provider may make an oral presentation to the Committee in respect to the Infraction Report. The Service Provider will have up to sixty (60) minutes to make their oral presentation. The Service Provider is encouraged to provide all information related to the infraction to be presented to the Committee, via the Secretary, at least one (1) week in advance of the meeting.

~~In advance of the meeting, the Service Provider can make a request to the Secretary, with justification, for an increase to the sixty (60) minute presentation time. The Qualification Committee Chair will review the request and will either grant an extension, detailing the new presentation time limit, or deny the extension.~~

A ministry representative will have the opportunity to attend the meeting and listen to the information about the Infraction Report that is presented by the Service Provider to the Committee by the Secretary as well as the Service Provider's oral presentation to the Committee. ~~During the oral presentation, all communication by the ministry representative and Service Provider to the Committee will be facilitated via the Secretary.~~

~~The Committee considers the Statement of Facts, responses to the Statement of Facts, the content from a presentation made by the Service Provider (as applicable), and will issue a final written decision.~~

~~Details regarding the Committee's role, purpose, mandate, membership and structure are accessible in the most recent edition of the "Qualification Committee Procedures" document.~~

Possible Actions for an Infraction Report:

~~The Committee will assess an Infraction Report, the Statement of Facts, and associated supporting documents and determine the most appropriate action to affect positive change and improve the Service Provider's performance. These available actions include:~~

- ~~• No Action, or~~
- ~~• Warning Letter, or~~
- ~~• Prevention Plan, or~~
- ~~• Disqualified bid suspensions for a specified period, and / or~~
- ~~• Actions specific to the infraction~~

~~When a disqualified bid suspension is imposed, its duration and effective dates will also be decided by the Committee.~~

~~Detailed descriptions for the criteria used by the Committee with respect to the available actions (No Action, Warning Letter, Prevention Plan, Disqualification(s)) as well as the sanction's duration and effective dates are available in the most recent edition of the "Qualification Committee Procedures" document.~~

~~In the case of consortia, any sanction imposed by the Committee will be applied equally to all qualified Service Providers.~~

~~The written decision of the Committee regarding the infraction will include the following components and will be sent to the Service Provider and to the MTO lead office:~~

- ~~i. Reason(s) for the decision and the basis for such findings.~~
- ~~ii. Reference to the Assignment's provisions, if applicable.~~
- ~~iii. If a sanction is imposed a statement will be included confirming that the Committee has given consideration to all other contractual consequences that have been or may be assessed against the Service Provider with respect to the infraction.~~

~~Sanctions are effective the date of the letter notifying the Service Provider of the Committee's decision. Decisions of the Committee are final, confidential and are available only to the Service Provider, Committee members, to the Regional Director and Regional Manager in the Region that issued the Infraction Report.~~

~~For details about the roles and responsibilities of the Qualification Committee, refer to Qualification Committee Procedures available at [TechPubs](#) site.~~

6. REFERENCE DOCUMENTS

~~The following documents are available on the [ministry's TechPubs](#) site:~~

- ~~• Qualification Procedures for [Contractors Engineering Service Providers \(ESPs\) – Policy and Guidelines](#)~~
- ~~• Qualification Committee Procedures~~
 - ~~• [Procedures for Processing the Contractor Pre-Qualification Exclusion](#)~~

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- ~~Contractor~~Consultant Performance ~~Rating Manual~~
and Selection System (CPSS) - Procedures Guide

APPENDIX I



Ministry of
Transportation

WARNING OF INFRACTION REPORT

SERVICE PROVIDER: _____ ASSIGNMENT NO.: _____

REGION: _____ HWY NO: _____ LOCATION: _____

INSTRUCTIONS

TO REGION:

1. The Warning of Infraction is to include the following components:
 - Description of subject activity of the Service Provider, date and location.
 - What is the Assignment term and condition/clause(s) violated, as applicable?
 - When did the Service Provider violate the Assignment term and condition/clause(s)?
 - Explanation of how the subject activity is contrary to contract requirements.
 - List of previous verbal warnings or/and written warnings and to whom was it given (attach copies as applicable).
 - Explanation of any corrective action taken by the Service Provider to modify their operations, as applicable.
 - Cost description of impact of subject conduct, if applicable and if known.
 - Attach copies of the Service Provider's written responses to prior notices, if applicable.
 - Statement of whether the matter constituted a reportable event to a governing / regulatory authority including: Ministry of Environment, Ministry of Natural Resources and Forestry, Ministry of Labour, Fisheries and Oceans Canada, Conservation Authorities, or other governing / regulating authority (attach a copy of the incident report from the governing/regulatory authority, if applicable).
2. Present the completed form to the Service Provider's Key Contact listed in RAQS and Project Manager.
3. Send copy to the Service Provider's corporate office.
4. Send copy electronically / fax / mail to the Secretary, Qualification Committee, Construction & Engineering Contracts Section, Ministry of Transportation, 301 St. Paul St., St. Catharines, ON L2R 7R4, Fax: 905-704-2040.

TO SERVICE PROVIDER:

Unless corrective action is taken, the ministry will issue an Infraction Report, which will be assessed by Qualification Committee and may have an impact on the Service Provider's

~~qualification rating. The Service Provider is encouraged to act immediately and contact the MTO's Project Manager/Agreement Administrator to arrange for a meeting to discuss this matter.~~

Prepared by: _____ Title: _____ Date: _____

APPENDIX H



Ministry of
Transportation

CONSULTANT'S INFRACTION REPORT

SERVICE PROVIDER: _____ ASSIGNMENT NO.: _____

REGION: _____ HWY NO: _____ LOCATION: _____

INSTRUCTIONS

TO REGION:

1. Complete form by marking "X" in applicable boxes.
2. Provide supporting evidence of the infraction, in the form of a chronological summary as an attachment.
3. The following should be addressed to support the Consultant's Infraction Report:
 - * Description of subject activity of the Service Provider, date and location.
 - * What is the Assignment term and condition/clause(s) violated?
 - * When did the Service Provider violate the term and condition/clause(s)?
 - * Explanation of how the subject activity is contrary to contractual requirements.
 - * What action did the ministry take (e.g. verbal and/or written warnings, Warning of Infraction)? List of previous verbal warnings or/and written warnings and to whom was it given and Warning of Infraction (attach copies as applicable).
 - * Explanation of any corrective action taken by the Service Provider, as applicable.
 - * Cost description of impact of subject conduct, if applicable and if known.
 - * State and attach copies of Service Provider written responses to prior notices, if applicable.
 - * Statement of whether the matter constituted a reportable event to a governing/regulatory authority including: Ministry of Environment, Ministry of Natural Resources and Forestry, Department of Ocean and Fisheries and Oceans Canada, Ministry of Labour, Conservation Authorities (attach a copy of the incident report from the governing/regulatory authority, if applicable).
 - * State if the subject of the Service Provider's Infraction Report (Infraction Report) is also the subject of a pre-existing dispute; if yes, state the status of the dispute.
4. All supporting evidence must be made available to the Service Provider upon issuing the infraction.
5. Hold meeting with the Service Provider to present Infraction Report².
6. Forward one copy to Secretary, Qualification Committee, Construction and Engineering Contracts Section, Ministry of Transportation, 301 St. Paul St., St. Catharines, ON L2R 7R4, together with the minutes of the meeting to present the Infraction Report.

²An Infraction Report should be followed by a telephone call to explain the reasons for issuing the Report.

TO SERVICE PROVIDER:

Qualification Committee will deal with this Infraction Report. Any response or comments are to be sent to the Secretary, Qualification Committee within 15 business days of the receipt of this Infraction Report, with a copy to the Manager in the applicable office.

TYPE OF INFRACTION:

- (A) Poor quality of services attributable to Service Provider (or sub-Service Provider)
- (B) Failure to abide by the tendering requirements.
- (C) Failure to provide adequate organization, cooperation, personnel or equipment to perform the services.
- (C) Tender declarations that are incomplete, inaccurate, or are not adhered to.
- (D) Failure to discharge liabilities
- (E) Offering inducements to MTO Project Manager/Agreement Administrator.
- (D) Failure to comply with terms and conditions of the Assignment.
- (E) Wilful disregard of written instruction to correct/adjust services or practices.
- (F) Serious defects in quality of the services and deliverables.
- (H) Severe contractual breaches, including default
- (I) Failure to adhere to the specifications, special provisions, or any contract specific clause.
- (J) Failure to complete the Assignment deliverables in a timely manner.
- (K) Failure to follow direction given by the MTO Project Manager/Agreement Administrator.
- (L) Other circumstances which may lead to a deteriorated working relationship.

Specify: _____

Prepared by: _____ Title: _____ Date: _____

Regional/Office Manager: _____ Date: _____

Date Presented to Service Provider: _____

APPENDIX III
Addresses of Ministry of Transportation Offices

~~Secretary, Qualification Committee
Ministry of Transportation
Contract Management Office, Construction and Engineering Section 301
St. Paul St.
St. Catharines, ON
L2R 7R4
General Enquiries 905-704-2203
Fax 905-704-2040~~

~~Ministry of Transportation (West Region)
659 Exeter Rd.
London, ON
N6E 1L3~~

~~Ministry of Transportation (Central Region) 1201
Wilson Avenue, Bldg D
Downsview, ON
M3M 1J8~~

~~Ministry of Transportation (Eastern Region)
Postal Bag 4000
1355 John Counter Blvd.
Kingston, ON
K7L 5A3~~

~~Ministry of Transportation (Northeastern Region)
447 McKeown Avenue
North Bay, ON P1B
9S9~~

~~Ministry of Transportation (Northwestern Region)
615 South James St.
Thunder Bay, ON
P7E 6P6~~

~~Ministry of Transportation (Head Office)
1201 Wilson Avenue, Bldg D Downsview,
ON
M3M 1J8~~

~~or~~

~~2nd Floor, 301 St. Paul St.
St. Catharines, ON
L2R 7R4~~

~~Note: Use P.O. Box number for mail, and street address for courier deliveries.~~