

**IN THE MATTER OF THE SECURITIES ACT  
R.S.O. 1990, c. S.5, AS AMENDED**

**- and -**

**IN THE MATTER OF  
BENNETT ENVIRONMENTAL INC., JOHN BENNETT,  
RICHARD STERN, ROBERT GRIFFITHS, and  
ALLAN BULCKAERT**

**SETTLEMENT BETWEEN STAFF OF THE  
ONTARIO SECURITIES COMMISSION and  
ROBERT GRIFFITHS**

**O R D E R  
(Section 127)**

**WHEREAS** on June 2, 2006 the Ontario Securities Commission (the “Commission”) issued a Notice of Hearing (the “Notice of Hearing”) pursuant to section 127 of the *Securities Act*, R.S.O. 1990, c.S.5, as amended (the “Act”), in respect of Robert Griffiths (“Griffiths”);

**AND WHEREAS** Griffiths entered into a settlement agreement with Staff of the Commission, dated November 21, 2006 (the “Settlement Agreement”), in which the parties have proposed a settlement of the proceeding commenced by the Notice of Hearing, subject to the approval of the Commission;

**AND UPON** reviewing the Settlement Agreement and the Statement of Allegations of Staff of the Commission, and upon hearing submissions from the counsel for Griffiths and from Staff of the Commission;

**AND WHEREAS** the Commission is of the opinion that it is in the public interest to make this Order;

**IT IS HEREBY ORDERED THAT:**

1. the Settlement Agreement is hereby approved;
2. Griffiths shall be prohibited from trading in securities for a period of 15 years, with the exception that after 2 years from the date of this Order, Griffiths may trade for the account of his personal registered retirement savings plan (as defined in the *Income Tax Act* (Canada));
3. Griffiths shall be prohibited from acting as an director or officer of any issuer for a period of 15 years from the date of this Order; and
4. Griffiths shall immediately pay to the Commission the sum of \$150,000 as an administrative penalty designated for allocation to or for the benefit of third parties in accordance with subsection 3.4(2) of the Act.

**DATED** at Toronto this 30<sup>th</sup> day of November, 2006.

“Paul M. Moore”

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Paul M. Moore

“Robert L. Shirriff”

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Robert L. Shirriff

“David L. Knight”

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David L. Knight