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July 20, 2026

Michelle Walsh-Doucette
Commission Clerk
Island Regulatory and Appeals Commission
5th Floor, National Bank Tower
134 Kent Street, P.O. Box 577
Charlottetown, PE C1A 7L1
By email: mwalshdoucette@irac.pe.ca

Re: Appeal LA26008 – Request for Complete Appeal Record, Further Disclosure and Preservation

Dear Ms. Walsh-Doucette,

We act for the Appellants, James and Suzanne Jordan in Appeal LA26008.

AMENDED NOTICE OF APPEAL

The Jordans had initially been self-represented due to difficulties finding non-conflicted counsel in PE and filed a preliminary notice of appeal on their own. The Appellants filed their original Notice of Appeal within the statutory appeal period while they were self-represented and before they had obtained legal advice or access to the complete application and decision record. The original Notice was sufficient to commence this appeal, but it was necessarily prepared without the benefit of counsel, without the signed decision, and without the Appeal Record. The Appellants have since retained Quinn Law Inc. and have instructed us to file the enclosed Amended Notice of Appeal as a wholesale redraft and particularization of their appeal.

The enclosed Amended Notice concerns the same Appellants and the same June 4, 2026 decision that are the subject of Appeal LA26008. It does not add a new appellant, discontinue the existing appeal, or commence a new appeal. Rather, it more accurately identifies the decision and statutory framework, particularizes the Appellants' standing and grounds of appeal, clarifies the relief sought, and organizes the issues that will require determination after production of the complete Appeal Record. The Appellants' instructions are that the enclosed Amended Notice is to supersede and replace the original Notice of Appeal as the operative pleading for all further purposes in this proceeding, while preserving the original filing date and continuity of Appeal LA26008.

Subsection 28(5) of the *Planning Act* requires a notice of appeal to be in writing and to state the grounds of appeal and the relief sought. Subsection 28(7) provides that the Commission determines its

own procedure in planning appeals, subject to the applicable regulations and the rules of natural justice. The Commission's Rules of Practice and Procedure then expressly provide the procedural mechanism for amending a Notice of Appeal

In particular:

Rule 27(1) permits a party to amend a Notice of Appeal at any time before fourteen days prior to the hearing date, after which the Commission's consent is required;

Rule 27(2) requires Commission consent where an amendment adds a party;

Rule 27(3) requires the amended document to bear the date of the original Notice and to use the original title preceded by the word "Amended";

Rule 27(4) requires additions to be underlined and deletions to be shown by striking through the original text;

Rule 27(5) permits the Commission to consider prejudice, the timing of notice to the other parties, and any other relevant factors; and

Rule 27(6) requires the amended Notice to be filed with the Commission and served on all parties.

No hearing date has been fixed, the amendment is being delivered at an early stage of the proceeding, and it does not add a party. The amendment therefore falls within Rule 27(1) and does not require prior leave of the Commission. It is also consistent with the Commission's June 24, 2026 procedural correspondence, which expressly contemplated that the Appellants could particularize and clarify the grounds set out in their original Notice after reviewing the Appeal Record.

Accordingly, the Appellants request that the Commission:

1. file the enclosed Amended Notice of Appeal in Appeal LA26008;
2. treat the Amended Notice as superseding and replacing the original Notice for all further procedural and substantive purposes;
3. place both the original Notice and the Amended Notice in the Commission's record, while treating the Amended Notice as the operative pleading; and
4. direct that all future responses, disclosure, procedural steps and hearing preparation address the grounds and relief set out in the Amended Notice.

For compliance with Rule 27(4), a marked version showing the amendment is enclosed. Because the amendment is a wholesale redraft, the marked copy reproduces the substantive wording of the original Notice in strike-through and the complete replacement pleading in underline. A clean copy is enclosed for ease of reading. Counsel's Concordance and Schedule of Amendments and Enclosures is also enclosed to identify where the original grounds and particulars have been preserved, narrowed, omitted, or particularized. A copy of the original Notice is included for reference, although it already forms part of the Commission's record.

In the alternative, should the Commission conclude that its consent is required because of the extent of the redrafting or for any other procedural reason, the Appellants respectfully request that consent be

granted. The amendment is made promptly following the retention of counsel, concerns the same decision and parties, is being delivered before a hearing date has been fixed, and will assist all parties and the Commission by clearly defining the issues. No responding party will suffer procedural prejudice that cannot be addressed through an appropriate timetable for responding to the Amended Notice.

REQUEST FOR DISCLOSURE

This request identifies the documents that should be included in the Appeal Record and requests preservation and production of further relevant information presently in the custody or control of the Minister, the Developer, or their agents and consultants.

The request is made so that the record can be completed efficiently. It relies on the Commission's Practice Direction on Appeal Records and Rules 32(f), 32(h), 34, 46 and 48 of the Rules of Practice and Procedure. Those provisions authorize the Commission to address access to information, direct further disclosure, establish interrogatories, request further material required for a complete understanding of an issue, and order the exchange of documents. We note that we are still gathering documents from the Appellant intended to be relied upon in the appeal. We anticipate having the majority of the Appellants' relied upon documentation filed with the Commission and served upon the Developer by the end of the week. We note that the developer has been given a date in August in which to respond to the Appellants' appeal materials. We are happy to consent to a longer period, given the grounds of appeal being raised in the Amended Notice of Appeal.

This is not a request that the Respondent or Developer create studies that do not exist. Where a requested study, report, analysis or plan was not obtained before the decision, the Appellants ask that the record state that fact expressly. The absence of material that would ordinarily inform the statutory planning analysis may itself be relevant to the appeal. Documents created after June 4, 2026 are sought as supplementary disclosure only where they identify the plan or conditions actually approved, explain design matters deferred to later permitting, bear on standing or relief, or provide the factual basis for official compliance representations.

Foundational decision and application record

1. The signed, dated and complete June 4, 2026 decision concerning File 64362, including all schedules, conditions, approved plans, stamps and attachments.
2. The complete application associated with File 64362, including the application form, fee record, ownership authorizations, legal description, surveys, plans and every revision.
3. Documents identifying whether the June 4 decision was preliminary or final subdivision approval, a consolidation, an attachment of land, a change of use, a development permit, or a combination of approvals.
4. Every other decision issued on or about June 4, 2026 respecting the proposed golf course, PIDs 812917, 812941 or 115519, including any decision under Case #2025-018.

5. The complete Case #2025-018 change-of-use file, including the application, the October 10, 2025 notice and attached nine-hole sketch, every plan and revision, public submissions, staff analysis, recommendation and decision.
6. Any order of the Lieutenant Governor in Council under subsection 28(2) of the Planning Act purporting to curtail a right of appeal because of an approval under the Environmental Protection Act or Water Act, together with the reasons, supporting record and all correspondence concerning any such order; or express confirmation that no such order exists.
7. The statutory delegation, appointment or other authority relied upon by each person who reviewed, recommended, approved or signed the decision.
8. The complete planning staff report, recommendation, checklist, decision memorandum, reasons, draft reasons and approval chronology.

Project evolution and technical review

9. The complete record for the original nine-hole proposal, including the original project description, all plans, technical materials, comments, departmental referrals and correspondence.
10. The written withdrawal, rejection, provisional rejection or other disposition of the nine-hole proposal and all correspondence explaining why it did not proceed in its submitted form.
11. Every revised nine-hole, ten-hole, eleven-hole and twelve-hole concept, layout or drawing, whether formal or informal, including native electronic and GIS files, revision dates, authors, transmittal records and any notation identifying whether the version was submitted, reviewed, rejected, withdrawn, approved or superseded.
12. A plan-version and approval crosswalk identifying the precise course plan, parcel configuration, number of holes, irrigation concept and supporting project description before the decision-maker at each stage, including the Environmental Impact Assessment approval, Case #2025-018, File 64362, any development permit and each subsequent permit.
13. All records identifying detailed design elements left to subsequent permitting, the legal and technical basis for deferring them, the limits or parameters imposed on later design, and the process for determining whether a later design change requires a revised application, referral, notice, approval or appeal period.
14. All documents concerning the addition or use of PID 115519 and all analysis of whether that change required a fresh application, notice, referral, public meeting or environmental review.
15. The membership, mandate, meeting dates, agendas, minutes, notes, recommendations, marked plans and correspondence of any technical review committee or interdepartmental review group.
16. Every proponent response to technical-review comments, deficiency requests or redesign directions.

Public notice, consultation and procedural fairness

17. All notices, advertisements and property-owner mailing lists used for the nine-hole proposal, including the October 10, 2025 notice and attached sketch; the GIS, cadastral or other analysis used to identify owners within 100 metres; the source assessment-roll address for each recipient; the date and method of mailing; any Canada Post manifest or proof; returned or undeliverable mail; and records concerning postal disruption, delayed delivery, or use of 10012 Northside Road rather than 12360 Northside Road for the Jordans.
18. The complete record of the October 29, 2025 public meeting, including presentation materials, recordings, transcripts, minutes, attendance records, written questions and answers.
19. All public submissions and departmental summaries of those submissions, including every submission from James or Suzanne Jordan and proof of when and by whom each was reviewed.
20. All internal communications concerning delivery or late receipt of the notice by the Jordans, their attendance at the public meeting, the decision to accept late comments, the treatment of those comments, and whether any assumption of no objection was recorded or relied upon.
21. All analysis or decisions concerning whether the replacement twelve-hole proposal required renewed public notice, a further meeting, further referrals or a renewed comment period.
22. All communications with affected neighbouring owners, including Linda MacDonald or any owner or occupier of PID 843243.
23. Archived copies and metadata for every public website posting relating to Case #2025-018, File 64362, the nine-hole proposal, the twelve-hole proposal, the Environmental Impact Assessment approval and the June 4 decision, including the date each version was posted, altered or removed.

Planning compatibility, nuisance and public safety

24. All planning analysis concerning compatibility with the Jordans' jointly owned and occupied approximately 16.19-acre coastal residential property and the reasonable enjoyment of PID 921791, including home-based contract work, artistic work, gardens, orchard development, reforestation, outdoor living, the private well and on-site sewage system.
25. All surveyed or calculated distances and all GIS or cadastral overlays from tees, greens, fairways, practice areas, parking, maintenance buildings, pumps, wells, pathways, restaurants or concessions to PID 921791, its property lines, residence, well, septic system and principal outdoor-use areas, including the analysis underlying the Department's determination that the Jordans were within the 100-metre notice radius.
26. Any golf-course routing, errant-ball, safety-zone, setback, netting, berm, fencing, signage or risk assessment.
27. Any acoustic, noise, vibration, lighting, dust, odour, operating-hours or construction-impact assessment.
28. All traffic, parking, entrance, emergency-access, pedestrian-safety and road-capacity assessments.
29. All security, trespass, surveillance, public-access and shoreline-access plans.

Water, irrigation, drainage and wastewater

30. The final irrigation plan and every draft, including well locations, design capacity, pump specifications, storage, water-source assumptions and operating schedule.
31. All water-demand calculations, irrigation budgets and assumptions, including any material referring to capacity of or demand exceeding 2,000,000 gallons per week.
32. All well logs, pump tests, aquifer tests, hydrogeological assessments, groundwater models and cumulative water-use assessments.
33. All applications, permits, approvals, conditions, monitoring requirements and correspondence respecting irrigation wells, water withdrawal, water allocation, well construction, pumping or storage under the Water Act or any other applicable enactment.
34. All inventories, maps or analyses of private wells and on-site sewage systems considered in the review, and every proposal or condition for baseline and ongoing monitoring of neighbouring wells, including any monitoring contemplated for PID 921791.
35. All analysis of salt-water intrusion, drought, climate vulnerability, effects on neighbouring wells, wetlands, agriculture and septic systems.
36. All final and draft grading, contour, topographic, drainage, stormwater, erosion-and-sediment-control and hydrological plans.
37. All wastewater, septic, wash-water, clubhouse, restaurant or concession servicing plans and approvals.

Wetlands, watercourses, coast and environmental review

38. Every environmental project description, environmental-screening document, Environmental Impact Assessment submission, addendum, deficiency response, recommendation, decision and approval concerning either proposal, including the precise plan version and project description approved.
39. The signed Environmental Impact Assessment approval, every schedule and specific Ministerial condition, all amendments or clarifications, every compliance deadline, and all materials showing that the approval was obtained before the June 4 planning decision as required by section 5 of the Subdivision and Development Regulations.
40. All before-and-after plans, calculations, correspondence and technical analysis showing how the approved project was modified to avoid major wetland impacts, together with the decision, rationale and calculation supporting the conclusion that no wetland compensation was required.
41. All inspection reports, field notes, photographs, drone imagery, GPS records, survey measurements, staff communications and technical analysis supporting the conclusions that observed shoreline erosion was attributable to natural coastal processes, required buffer setbacks remained in place, ongoing work complied with the approval, and there were no major environmental concerns.

42. A complete permit and condition-status record identifying every additional permit or approval required after the Environmental Impact Assessment approval, each application and supporting design submitted, each permit issued, refused or outstanding, the responsible authority, all conditions, and any design change from the plan considered before June 4, 2026.
43. All records reviewed, created or relied upon in preparing and approving the Minister of Land and Environment's responses to Suzanne Jordan dated May 20 and June 11, 2026, including internal referrals, drafts, briefing material and instructions, excluding privileged legal advice but subject to a proper privilege log.
44. Every wetland and watercourse delineation, buffer calculation, survey, GIS layer and field note, including all work by Granville Ridge or any other consultant.
45. All applications, advice, permits or proposed conditions under the Environmental Protection Act and the Watercourse and Wetland Protection Regulations.
46. All plans for vegetation clearing, grading, pathways, bridges, boardwalks, staircases, beach access or other work within or near a wetland, watercourse, coastal bank or buffer.
47. All coastal-erosion, bank-stability, geotechnical, slope-hazard, public-safety and shoreline-moratorium analysis.
48. All records respecting the former shore road, public or historic access, Crown-owned lands or any proposed crossing, occupation or restriction of access.
49. All federal or provincial species-at-risk, Bank Swallow, nesting-bank, habitat or migratory-bird assessments, referrals, advice and mitigation plans.
50. All correspondence with Environment and Climate Change Canada, Fisheries and Oceans Canada, or any other federal agency.

Chemicals, turf management and operational commitments

51. A complete list of proposed fertilizers, herbicides, fungicides, insecticides and other products, with anticipated application rates, annual quantities, storage, mixing, spill-response and monitoring plans.
52. The turfgrass and vegetation-management plan, including the proposed use of fescue and any limitation on irrigated or intensively maintained areas.
53. The integrated pest-management plan and all analysis of runoff, leaching, groundwater or neighbouring-property exposure.
54. All documents concerning electric maintenance equipment, walking-only operation, golf carts, alcohol service, food service, hours of operation and course-access controls.
55. A matrix identifying each material mitigation or operating representation made by the Developer, whether the Minister relied on it, and the enforceable approval condition or agreement—if any—securing it.

Land title, parcel configuration and statutory landholding conditions

56. Current and historical title searches, deeds, plans and parcel descriptions for PIDs 812917, 812941 and 115519 and any parcel required for access, utilities, drainage or course operation.
57. All subdivision, consolidation, attachment, boundary-adjustment and conveyance plans relating to the proposal.
58. All Executive Council orders, Lands Protection Act applications, conditions, undertakings, variations or cancellations applying to the Developer, related entities or the subject lands.
59. All analysis of any condition that the acquired lands not be subdivided and whether File 64362 is consistent with that condition.
60. All records concerning any provincial or Crown-owned former road or strip crossing the project, including licences, easements, permissions, applications and refusals.

Construction, site alteration, compliance and enforcement

61. All inspection notes, photographs, complaints, warnings, stop-work orders, compliance directions, offence investigations and enforcement correspondence concerning cutting, logging, clearing, excavation, grading, wood burial, borrow pits, sand importation, depositing or stockpiling fill, or other site work from March 1, 2025 onward, including work on land added to the revised proposal.
62. All records concerning “wood vaulting,” wood-burial pits, methane, groundwater separation, impervious encapsulation, geotechnical testing, borrow-material extraction and backfilling.
63. All records determining whether work constituted development requiring a permit and whether the Developer complied with any stop-work direction.
64. All submissions, certifications, reports or other materials required by any approval condition by June 30, 2026 or another deadline, and every inspection, determination or communication confirming, disputing or extending compliance with those conditions.
65. All as-built surveys, drone imagery, progress reports and photographs held by the Respondent or supplied by the Developer.

Internal communications, consultant records and electronic information

66. All relevant emails, text messages, Teams or other electronic communications among the Respondent, the Minister's office, the Developer, consultants, technical reviewers, inspectors and decision-makers, including communications concerning the Jordans' submissions, project redesign, notice, inspections, compliance, permit sequencing and the June 4 decision.
67. All consultant terms of reference, retainers, instructions, draft reports, peer reviews, comments and final reports relied upon or considered.
68. All handwritten notes, telephone memoranda, calendar entries and meeting records relating to the application or decision.

69. All internal routing records, briefing notes, draft responses and approvals concerning correspondence from James or Suzanne Jordan, including the May-June 2026 Ministerial correspondence, sufficient to identify the information and officials relied upon in responding.
70. Native-format copies of material plans, GIS files, spreadsheets, models and databases where their functionality or metadata is relevant.
71. A list and description of any responsive document withheld for privilege, confidentiality or another reason, sufficient to permit the Appellants to assess the claim without disclosure of privileged substance.

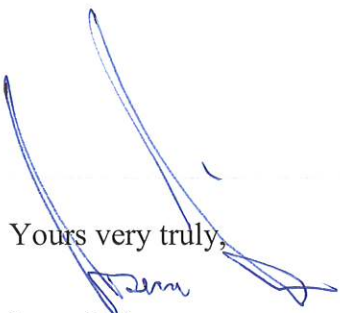
Requested directions and certification

The Appellants respectfully request that the Commission:

72. direct the Respondent to include all documents that were before, generated by, or materially considered by the decision-maker in the certified Appeal Record;
73. direct the Respondent and Developer to advise expressly which requested categories do not exist or were not obtained before the decision;
74. direct the Respondent to identify the final controlling plan and conditions at each approval stage, and to identify expressly every design element deferred to a later permit;
75. direct the Respondent to produce any order under subsection 28(2) of the Planning Act or confirm formally that no such order exists;
76. direct production of relevant documents outside the strict decision record where necessary for a fair hearing, or establish an interrogatory process under Rule 34;
77. require a privilege or withholding log for any responsive documents not produced;
78. direct all parties to preserve relevant paper and electronic records, including native files, metadata, text messages and drafts;
79. permit the Appellants to supplement and further particularize their grounds after the completed record and any ordered disclosure are received; and
80. set a reasonable timetable for objections, production, any preliminary hearing, expert evidence and the Appellants' substantive response.

To promote proportionality, we invite the Respondent and Developer to identify any category they consider unclear, unduly broad or outside their custody or control. We are prepared to confer promptly, but do not waive the Appellants' right to seek a preliminary hearing or further direction under Rules 32, 34, 46 and 48.

Please confirm by July 31st, 2026 whether the requested materials will be included voluntarily and identify the anticipated production date. If the parties cannot agree, we ask that this letter be treated as a request that the disclosure and record-completeness issues be placed on the agenda for the earliest available pre-hearing conference or preliminary hearing.



Yours very truly,

Isaac Quinn
Quinn Law Inc.

cc: Eugene Lloyd, Manager, Development Control, Minister of Land and Environment
Sticks and Stones Developments Inc.
James Jordan and Suzanne Jordan

Enclosures:

1. Proposed Amended Notice of Appeal - clean copy;
2. Proposed Amended Notice of Appeal - Rule 27 marked copy;
3. Counsel's Concordance and Schedule of Amendments and Enclosures; and
4. Original Notice of Appeal and attachment - for reference.

Authorities referred to:

Planning Act, R.S.P.E.I. 1988, c. P-8, ss. 27.1 and 28, including s. 28(2); *Planning Act Subdivision and Development Regulations*, ss. 3-5, 11, 13, 29 and 31-32; *Island Regulatory and Appeals Commission, Rules of Practice and Procedure*, rr. 21-23, 32-34, 46, 48, 50-52 and 61; *Practice Direction on Appeal Records*; Commission correspondence dated June 24, 2026 in Appeal LA26008.

**PRINCE EDWARD ISLAND REGULATORY AND APPEALS COMMISSION
APPEAL LA26008**

PROPOSED AMENDED NOTICE OF APPEAL - RULE 27 MARKED COPY

MARKING CONVENTION: Because the amendment is a wholesale redraft, the substantive wording of the original Notice is reproduced below in strike-through, followed by the complete replacement pleading in underline. The original signatures and the planning-decision printout attached to the original Notice remain in the Commission file and are not treated as deleted evidentiary material.

TEXT DELETED FROM THE ORIGINAL NOTICE OF APPEAL

Notice of Appeal

~~(Pursuant to Section 28 of the Planning Act)~~

~~TO: The Island Regulatory and Appeals Commission, National Bank Tower, Suite 501, 134 Kent Street, P.O. Box 577, Charlottetown PE C1A 7L1.~~

~~TAKE NOTICE that I/we hereby appeal the decision made by the Minister responsible for the administration of various development regulations of the Planning Act on the 4th day of June, 2026, wherein the Minister made a decision to allow rezoning of land to allow construction of a golf course.~~

~~The decision lists PID 812917 however the appeal is for any decision for the combined property which includes PID 812941 and 115519.~~

~~AND FURTHER TAKE NOTICE that, in accordance with the provisions of Section 28.(5) of the Planning Act, the grounds for this appeal are as follows:~~

~~Grounds for appeal are based on 27.1 (d) of the Planning Act which state "an individual who in good faith believes the decision will adversely affect the reasonable enjoyment of the individuals property..."~~

~~Details of specific anticipated nuisance arising from the proposed development are listed on the attached document.~~

~~AND FURTHER TAKE NOTICE that, in accordance with the provisions of Section 28.(5) of the Planning Act, I/we seek the following relief:~~

~~We seek to have the development disallowed. The proponent has not demonstrated that any of the substantial adverse affects listed on the attached document to be unfounded nor provided any mitigation measures.~~

~~Appellants: James & Suzanne Jordan; 12360 Northside Road, Route 16, Monticello, PE C0A 2B0;
james.jordan.3927@gmail.com; 647-878-5435; dated June 21, 2025.~~

Notice of Appeal Attachment

~~We have previously expressed our opposition to the proposed golf course development as it conflicts with our current and intended land (PID 921791) use which is full-time residence, working from home, small-scale agriculture and reforestation. The development now also directly impacts the adjoining landowner residing on PID 843243. The developer also intends to construct the project on provincially owned land and we do not consider this a reasonable or legal use. The land was a previously used road from Naufrage to the mouth of the Cow River.~~

~~Our understanding of the Planning Act, Environmental Protection Act and interpretation of civil law leads me to believe that this development should have been denied at an earlier stage. This appeal will focus on the specific grounds allowed under legislation which is the infringement on an individuals right to enjoy one's private property. A review of previous submissions should however be considered for context.~~

~~Construction and operation of a commercial golf course immediately adjacent to an existing private residence without their consent would be unprecedented. By their nature, golf courses are a source of many potential hazards and annoyances and any reasonable developer would seek to locate their operation away from the general population. Standards developed in the golf industry, such as minimum separation distance to homes, were developed for masterplanned golf communities or where housing developments were built beside an existing golf course. Those standards cannot be imposed on home owners where the opposite situation exists.~~

~~Specific anticipated nuisances and damage which would adversely affect the reasonable enjoyment of our property are as follows:~~

- ~~• Errant balls causing injury or damage to property and the ever present fear of being struck oneself of having a ball strike a visitor;~~
- ~~• Construction noise and dust;~~

- Persistent noise from multiple sources such as yelling, balls being hit, lawn mowers, sprinklers, etc. will be present not only throughout the operating hours but also in the early morning or late evening when maintenance is being performed;
- Trespassing along the over 600-m boundary is anticipated given the lack of any separation to the area of play and lack of any physical barrier;
- Security, both personal and for property is a concern;
- Odour from the restaurant;
- Diminished property values;
- Increase home insurance costs;
- Groundwater and well contamination from pesticides and fertilizer;
- Crop and garden contamination from pesticides;
- Disruption of groundwater or surface water causing flooding or septic system issues;
- Health hazards such as elevated risk of cancer and Parkinson's Disease have been identified in persons living near or working on golf courses;
- interference with our means of livelihood due to persistent noise.

TEXT ADDED TO REPLACE THE ORIGINAL NOTICE OF APPEAL

CANADA

PROVINCE OF PRINCE EDWARD ISLAND

IN THE MATTER OF THE

PLANNING ACT, R.S.P.E.I. 1988, c. P-8

AND IN THE MATTER OF APPEAL LA26008 BEFORE THE

PRINCE EDWARD ISLAND REGULATORY AND APPEALS COMMISSION

BETWEEN:

JAMES JORDAN and SUZANNE JORDAN

Appellants

AND:

MINISTER OF LAND AND ENVIRONMENT

Respondent

AND:

STICKS AND STONES DEVELOPMENTS INC.

Developer

PROPOSED AMENDED NOTICE OF APPEAL

(Planning Act, ss. 27.1 and 28; Commission Rule 27)

The Appellants, James Jordan and Suzanne Jordan, appeal the decision described below and state as follows:

PART I - DECISION UNDER APPEAL

Decision presently identified.

1. The appeal concerns the June 4, 2026 decision of the Minister responsible for the administration of the Planning Act respecting provincial planning File 64362 and PID 812917 at Northside Road / Route 16, Monticello. The Province's public planning decision page describes the matter as an approved one-lot subdivision and identifies the application detail as "Golf Course."

Related planning process.

2. The Department's October 10, 2025 notice identifies Case #2025-018 as an application to change the use of PIDs 812917 and 812941 from Resource (Forestry) to Recreational (Golf Course) use for a nine-hole course. Later materials describe a replacement twelve-hole proposal involving PIDs 812917, 812941 and 115519. The Appellants require the certified Appeal Record to establish the relationship among Case #2025-018, File 64362, the Environmental Impact Assessment approval and any development permit, and whether the June 4 decision was a preliminary subdivision approval, final subdivision approval, change-of-use authorization, development permit, or a combination of contemporaneous decisions.

Scope of appeal.

3. The Appellants appeal the June 4, 2026 decision and any written decision incorporated into it or issued contemporaneously as part of the same approval process, to the extent each such decision was made, posted or served within the statutory appeal period. The Province has separately confirmed an approval under the Environmental Protection Act. No order of the Lieutenant Governor in Council under subsection 28(2) of the Planning Act curtailing this appeal has been disclosed. The Appellants require production of any such order and do not purport to appeal the environmental approval itself or an unidentified future permit or approval.

Particularization after production.

4. The Appellants reserve the right, with leave if required, to further particularize the legal description, statutory stage and conditions of the appealed decision after production of the signed decision, approved plans and complete Appeal Record.

PART II - APPELLANTS AND STANDING

Ownership and occupation.

5. The Appellants hold title to PID 921791 as joint tenants under a deed dated March 6, 2024 and registered March 7, 2024. An occupancy permit was issued for the dwelling on September 16, 2025. The Appellants occupy the approximately 16.19-acre coastal property at 12360 Northside Road, Monticello, as their full-time residence. Their property is immediately adjacent to or in unusually close proximity to the lands and course components affected by the decision.

Statutory standing.

6. Each Appellant is an aggrieved person within paragraph 27.1(d) of the Planning Act because each, in good faith, believes the decision will adversely affect the reasonable enjoyment of property owned and occupied by them.

Objective and site-specific basis.

7. The October 10, 2025 Departmental notice stated that only property owners within 100 metres of the subject property would receive a letter, and the notice was sent to the Appellants. That is government-generated evidence that PID 921791 was treated as falling within the immediate notice radius. The registered deed and survey, occupancy permit, permit site plans and land-use plan further identify an occupied coastal home, private well, on-site sewage system, home-based work and artistic uses, gardens and orchard development, reforestation, greenhouse and storage areas, and substantial outdoor use.

Decision-linked adverse effects.

8. Available cadastral mapping and preliminary site plans place the project lands along the western side of the Appellants' parcel and indicate proposed playing or operational areas near the boundary, although exact distances and the final approved routing require professional confirmation. The reasonably apprehended effects include errant golf balls; intrusive play, maintenance, pump, vehicle and construction noise; early-morning and evening disturbance; trespass and security impacts; altered drainage, erosion or flooding; interference with well-water quantity or quality; and pesticide, fertilizer, sediment or other runoff through a credible site pathway. The Appellants will support these matters with survey, mapping, photographic, affidavit and expert evidence as appropriate.

Excluded generalized claims.

9. The Appellants do not rely for standing on generalized opposition to golf courses, loss of view, commercial competition, an unparticularized decline in property value, or generalized medical causation. Any such matter will be advanced only if it becomes legally relevant and is supported by admissible expert evidence.

PART III - GROUNDS OF APPEAL

Failure to identify the legal decision and give intelligible reasons.

10. The public posting and materials served to date do not disclose the signed decision, statutory source, approval stage, approved plan, conditions, delegation or reasons. The Minister failed to provide a transparent and intelligible basis showing what was approved, under what authority, and why the applicable statutory and regulatory criteria were satisfied.

Failure to decide the actual and complete proposal.

11. The approval process appears to have evolved from a nine-hole golf-course proposal involving PIDs 812917 and 812941 into a materially revised twelve-hole proposal involving PIDs 812917, 812941 and 115519. The Minister failed to ensure that the decision was made on a complete, current and internally consistent application reflecting the proposal actually intended to be constructed and operated.

Inadequate treatment of material redesign.

12. The prior nine-hole proposal was withdrawn or replaced following public and technical review. If the Appeal Record confirms material changes to the number and location of holes, affected parcels, wetland or coastal encroachments, irrigation, access, parking, maintenance facilities or other project components, the Minister failed to require a fresh and complete assessment of those changes and failed to explain whether renewed agency referral, notice or consultation was required.

Procedural fairness and meaningful participation.

13. The October 10, 2025 notice concerned the earlier nine-hole proposal, set a November 7 comment deadline, stated that a non-response would be treated as no objection, and advised that only owners within 100 metres would be notified. The Appellants allege the mailed notice was actually received after the October 29 public meeting and the stated comment deadline, although they independently attended and the Department later accepted comments. The Minister failed to demonstrate when notice was mailed or received, whether the Appellants' submissions were before and considered by the decision-maker, and whether the materially revised twelve-hole proposal required renewed notice, referral or a further opportunity for affected adjoining owners to address the actual proposal before approval.

Sound planning principles and suitability.

14. The approval is inconsistent with sections 3 and 13 of the Subdivision and Development Regulations, and with the applicable change-of-use and development-permit requirements, because the record does not demonstrate that the land and proposed lot configuration are suitable for the expressly identified golf-course use, having regard to compatibility with surrounding uses, topography, drainage and effects on adjoining land, traffic and access, utilities and services, wastewater, water supply and natural features.

Failure to assess compatibility with established residential use.

15. The Minister failed to rationally assess whether a commercial golf course, its routing and its associated parking, maintenance, irrigation, traffic and operational activities are compatible with the Appellants' pre-existing full-time residence, home-based work, artistic work, gardens, orchard, reforestation and outdoor uses, or to identify evidence-based setbacks, barriers, routing changes or operating conditions sufficient to address the conflict.

Inadequate application information.

16. The Minister failed to require, obtain or assess information reasonably necessary to evaluate the proposal under the Regulations, including a complete final twelve-hole course plan; legal survey and parcel configuration; final grading and topography; drainage and stormwater design; irrigation design and water budget; water-source and well information; hydrogeological analysis; wetland, watercourse and coastal delineation; erosion and sediment controls; traffic and entrance information; sewage and servicing; golf-ball safety; noise; security; and operating and maintenance parameters.

Improper deferral of essential design.

17. The Minister of Land and Environment stated in correspondence dated June 11, 2026 that more detailed design elements may continue to be finalized through subsequent permitting processes. To the extent core planning matters - including final routing, irrigation, grading, drainage, wetland and coastal layout, access, parking, servicing, safety or mitigation - were unresolved when the June 4 decision was made, the Minister approved an indeterminate proposal and deferred matters necessary to the statutory planning analysis without defined parameters, renewed review, notice or an effective opportunity to appeal the later design.

Water supply and groundwater effects.

18. The proposal contemplates substantial irrigation demand in a coastal area. The Minister failed to obtain or assess competent evidence respecting sustainable yield, cumulative water use, seasonal drought, salt-water intrusion, neighbouring wells, wetland hydrology and the relationship between water withdrawal, irrigation return flow and the Appellants' private well and on-site sewage system, or to establish appropriate baseline and ongoing monitoring.

Wetland, watercourse and coastal features.

19. The Province has represented that the project received Environmental Impact Assessment approval subject to specific Ministerial conditions, that the approved project was modified to avoid major wetland impacts, and that no wetland compensation was required. Those conditions, modification plans and calculations have not been disclosed. Without inviting a free-standing appeal of the environmental approval, the Appellants allege that the Minister failed to establish that the June 4 planning decision concerned the same final modified plan, accurately identified the remaining wetland, watercourse and coastal disturbance, and incorporated or otherwise secured the conditions on which the planning analysis relied.

Species-at-risk and reliability of technical materials.

20. The project description and related materials appear to have confused Bank Swallows with Cliff Swallows and to have relied on mitigation developed for a different species or context. The

Minister failed to resolve material errors and inconsistencies in the technical record before relying on it, and failed to demonstrate that species-specific mitigation was adequate, enforceable and compatible with the course operating season.

Drainage, grading and adjoining-property effects.

21. The Minister failed to assess the final post-construction grading, surface-water pathways, storm events, erosion, sediment movement and potential effects on the Appellants' lands, well, on-site sewage system, gardens, orchard, reforestation and outdoor-use areas. Approval without a final grading and drainage basis was premature and inconsistent with the mandatory suitability analysis.

Golf-ball safety and public safety.

22. The Minister failed to obtain or assess a professional routing and shot-dispersion analysis addressing the location of tees, landing areas and greens relative to the Appellants' boundary, residence and occupied outdoor areas; the foreseeable range and direction of errant balls; appropriate setbacks, orientation, barriers or netting; and the risk created by the apparent proximity of playing areas to an existing residence.

Noise and operational compatibility.

23. The Minister failed to obtain or assess competent evidence concerning construction noise, impulsive golf-ball impact noise, player noise, mowing, irrigation pumps, maintenance activity, vehicles, deliveries, parking and early-morning or evening operations. The Minister further failed to establish enforceable limits concerning hours, equipment, routing, screening and other mitigation necessary to protect the reasonable enjoyment of adjoining residential and home-work uses.

Security, trespass and access.

24. The Minister failed to adequately assess parking, access, fencing, signage, trespass prevention, retrieval of balls from adjoining or protected lands, emergency access, public access along any former shore road, and the legal authority to use or cross any Crown-owned strip or former road required by the project.

Unenforceable or undocumented mitigation representations.

25. The Developer represented, among other things, that the course would be walking-only, would not use carts, would use fescue, would reduce water, fertilizer and pesticide use, would use electric maintenance equipment, and would restrict player access to buffer areas. To the extent the Minister relied on such representations, the Minister erred by failing to document them accurately and secure them through clear, measurable and enforceable conditions or a development agreement.

Failure to impose adequate conditions and monitoring.

26. The decision and present record do not demonstrate conditions proportionate to the identified risks, plan-change controls, compliance monitoring, reporting, inspection rights, contingency measures, neighbouring-well monitoring or financial security where authorized. The existence of separate and presently undisclosed Environmental Impact Assessment conditions does not cure the planning decision unless the Minister established their content, applicability, enforceability and relationship to the final planning plan.

Segmentation and cumulative effects.

27. The Minister failed to assess the practical and cumulative effects of the subdivision, change of use, course layout, parking, maintenance, irrigation, water withdrawal, drainage, access, wetland crossings and related facilities as an integrated development. The project was instead segmented among the Environmental Impact Assessment, subdivision, change-of-use, development-permit and later permitting processes in a manner that prevented a complete suitability and compatibility analysis and obscured which final plan was actually approved.

Required outside approvals and prematurity.

28. Section 5 of the Regulations requires specified outside approvals to be obtained, as appropriate, before approval under the Regulations. The Province has confirmed that an Environmental Impact Assessment approval existed, but the approval, date, final plan and conditions have not been produced. The Minister failed to demonstrate that the same project plan was approved in each process and that all other approvals required at that stage - including any Lands Protection Act, Roads Act, Fire Prevention Act, Crown-land or other prerequisite authorization - were in place. The Appellants do not ask the Commission to determine a free-standing environmental or other regulatory appeal outside its jurisdiction.

Lands Protection Act and title conditions.

29. Published Executive Council orders concerning acquisitions by Sticks and Stones Developments Inc. appear to contain conditions that certain real property not be subdivided. If File 64362 subdivides, consolidates, attaches or otherwise alters a parcel subject to such a condition, and no valid variation or cancellation exists, the Minister failed to establish that the approval was legally available. Final particulars are reserved pending production of title records, surveys, Executive Council orders and any variations.

Crown land and former shore road.

30. The Minister failed to establish the Developer's legal authority over every area required for the course, access, pathways, utilities or related works, including any former shore road or Crown-owned strip traversing or adjoining the project lands, and failed to address the effect of the approval on lawful access and public safety.

Prior site work and compliance history.

31. The Appellants observed significant cutting or clearing, excavation, grading and sand importation or stockpiling beginning around March 2025, winter logging on land later associated with the revised proposal, and renewed clearing, excavation, grading and sand importation in spring 2026. The Appellants do not allege that every observed activity was unauthorized. They allege that the Minister failed to obtain and consider the complete inspection, stop-work, enforcement and compliance history, and to determine whether site conditions, application information and proposed mitigation accurately reflected work already undertaken.

Failure to consider relevant evidence.

32. The Minister failed to demonstrate a transparent assessment of the Appellants' submissions, the official 100-metre notice relationship, neighbouring land-use conflicts, technical-review

comments, agency advice, project revisions, prior compliance concerns and the reliability of the Developer's technical materials.

Irrelevant or unsupported considerations.

33. To the extent the decision relied on generalized community support, unverified economic benefit, the Developer's personal intentions, or non-binding statements of environmental responsibility, the Minister relied on considerations incapable of replacing the statutory suitability, compatibility and evidentiary analysis.

Unreasonableness.

34. The decision was unreasonable because the outcome and reasoning, viewed against the statutory scheme and the evidence required for a coastal golf-course development beside an established occupied residence, do not demonstrate a rational chain of analysis, an adequate and final evidentiary foundation, or meaningful engagement with the principal constraints and risks.

Further particulars.

35. These grounds are pleaded on the information presently available. The Appellants reserve the right, subject to Rule 27 and Commission direction, to add or refine particulars disclosed by the signed decision, complete applications, prior nine-hole file, final twelve-hole plan, Environmental Impact Assessment approval and conditions, technical-review materials, title documents, agency referrals, consultant reports, inspection records, later permits, correspondence and approval conditions.

PART IV - RELIEF REQUESTED

36. An order allowing the appeal and rescinding the June 4, 2026 decision;
37. Alternatively, an order varying the decision or remitting the application to the Minister for a fresh determination on a complete and current application, in accordance with the Planning Act, the Regulations and procedural fairness;
38. A direction that the Respondent file a complete and certified Appeal Record, including the signed decision, reasons, delegation, conditions, complete application history, all plan versions, Case #2025-018 materials, the prior nine-hole file, the Environmental Impact Assessment approval and conditions, wetland-avoidance modifications, inspection records, subsequent permit and plan-version records, any subsection 28(2) order, title and Executive Council materials, technical-review records, agency referrals, reports, notes and correspondence, together with a privilege log identifying any withheld document;
39. A preliminary conference or hearing to determine standing, identify the precise decision and approval stage, resolve Appeal Record and disclosure deficiencies, settle the issues and establish directions for expert evidence and the merits hearing;
40. Interrogatories or other procedural directions if material factual gaps remain after completion of the Appeal Record;
41. If the decision is not rescinded, such lawful and evidence-based conditions as are necessary respecting the controlling course plan, future plan-change approval, course routing, setbacks, errant-ball protection, water use, baseline and ongoing well monitoring, drainage, wetland and coastal protection, pesticide and fertilizer management, hours of operation, noise, lighting, access, parking, security, compliance monitoring and financial security where authorized;

42. A finding or declaration, to the extent within the Commission's jurisdiction, that the subdivision approval does not itself authorize construction, site alteration, water withdrawal, wetland or watercourse alteration, pesticide application, buildings, sewage systems, highway-access changes, food or beverage operations, or any activity requiring a separate permit or approval; and
43. Such further relief within the Commission's jurisdiction as is just.

PART V - DATE, CONTACT INFORMATION AND SERVICE

44. The original Notice was dated June 21, 2025. The reference to 2025 was a clerical error. The correct date of the original Notice is June 21, 2026.

DATED at Charlottetown, Prince Edward Island, this _____ day of July, 2026

ISAAC QUINN

TO: Prince Edward Island Regulatory & Appeals Commission
5th Floor, National Bank Tower
134 Kent Street, P.O. Box 577
Charlottetown, PE C1A 7L1

AND TO: Minister of Land and Environment, c/o Eugene Lloyd, Manager, Development Control
J. Elmer Blanchard Building
31 Gordon Drive
Charlottetown, PE C1A 6B8

AND TO: Sticks and Stones Developments Inc.
2887 St Marys Rd - Rte 224
New Glasgow, PE C0A 1N0

SCHEDULE A - PARTICULARS TO BE SUPPORTED BY EVIDENCE

- Registered title to PID 921791 in the Appellants as joint tenants, the September 16, 2025 occupancy permit, and continuous full-time occupation of the residence;
- The October 10, 2025 Departmental notice stating that only property owners within 100 metres of the subject property would receive a letter, together with the original notice and envelope;
- The registered survey, deed description, permit site plans and land-use plan locating the residence, boundary, well, on-site sewage system, shoreline, wetland, abandoned road, gardens, orchard, reforestation, greenhouse, storage and outdoor-use areas;
- The Appellants' present residential, home-based contract, artistic, gardening, orchard, reforestation and outdoor uses, distinguishing existing uses from future plans;
- Certified survey, GIS or professional measurement of the distance and orientation between the Appellants' lands and the final approved course components;
- The final twelve-hole routing and the location of tees, landing areas, greens, parking, maintenance, pumps, wells, pathways, bridges and access points;
- Existing drainage, wetland, watercourse and coastal pathways, including any observed ponding, erosion or water movement;
- Existing ambient sound conditions and the location and timing of noise-sensitive residential, home-work, artistic and outdoor uses;
- Original message exports, emails, public-meeting materials, full-resolution photographs and drone images documenting representations, project changes and site conditions; and
- Observed cutting, clearing, grading, excavation, logging, sand importation, stockpiling, access or other work, with the most accurate available dates, locations and photographs.

SCHEDULE B - MATTERS RESERVED PENDING THE APPEAL RECORD

- The signed June 4, 2026 decision, reasons, conditions, delegation and preliminary or final status;
- The relationship between File 64362, Case #2025-018, the Environmental Impact Assessment approval and any contemporaneous development or change-of-use approval;
- Whether any order under subsection 28(2) of the Planning Act exists or is asserted to curtail this appeal;
- The signed Environmental Impact Assessment approval, the final plan and project description to which it applies, and every specific Ministerial condition;
- The modifications said to avoid major wetland impacts, the no-compensation determination, and the inspection record supporting shoreline, buffer and compliance conclusions;
- Every detailed design element deferred to later permitting, and every subsequent permit application, plan, condition, approval or outstanding requirement;
- The complete parcel, title and survey history for PIDs 812917, 812941 and 115519;
- The application of any Lands Protection Act condition and any variation or cancellation;
- The complete nine-hole application, its withdrawal, and every subsequent twelve-hole revision;
- All technical-review committee materials and the Developer's responses;
- All existing consultant reports, agency referrals, environmental screening, inspection records, permits and approvals;
- The complete public-notice and public-meeting records, evidence that the Appellants' submissions were considered, and any related appealable decision for PID 812941 or PID 115519 made within the statutory appeal period.

**PRINCE EDWARD ISLAND
REGULATORY AND APPEALS COMMISSION**

**APPEAL LA26008
PROCEEDING COMMENCED AT
CHARLOTTETOWN, QUEENS COUNTY,
PRINCE EDWARD ISLAND**

**PROPOSED AMENDED NOTICE OF APPEAL
RULE 27 MARKED COPY**



Quinn Law

A LITIGATION BOUTIQUE

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CANADA
PROVINCE OF PRINCE EDWARD ISLAND

IN THE MATTER OF THE
PLANNING ACT, R.S.P.E.I. 1988, c. P-8
AND IN THE MATTER OF APPEAL LA26008 BEFORE THE
PRINCE EDWARD ISLAND REGULATORY AND APPEALS COMMISSION

BETWEEN:

JAMES JORDAN and SUZANNE JORDAN
Appellants

AND:

MINISTER OF LAND AND ENVIRONMENT
Respondent

AND:

STICKS AND STONES DEVELOPMENTS INC.
Developer

PROPOSED AMENDED NOTICE OF APPEAL

(Planning Act, ss. 27.1 and 28; Commission Rule 27)

The Appellants, James Jordan and Suzanne Jordan, appeal the decision described below and state as follows:

PART I - DECISION UNDER APPEAL

1. Decision presently identified. The appeal concerns the June 4, 2026 decision of the Minister responsible for the administration of the Planning Act respecting provincial planning File 64362 and PID 812917 at Northside Road / Route 16, Monticello. The Province's public planning decision page describes the matter as an approved one-lot subdivision and identifies the application detail as "Golf Course."

2. Related planning process. The Department's October 10, 2025 notice identifies Case #2025-018 as an application to change the use of PIDs 812917 and 812941 from Resource (Forestry) to Recreational (Golf Course) use for a nine-hole course. Later materials describe a replacement twelve-hole proposal involving PIDs 812917, 812941 and 115519. The Appellants require the certified Appeal Record to establish the relationship among Case #2025-018, File 64362, the Environmental Impact Assessment approval and any development permit, and whether the June 4 decision was a preliminary subdivision approval, final subdivision approval, change-of-use authorization, development permit, or a combination of contemporaneous decisions.

3. Scope of appeal. The Appellants appeal the June 4, 2026 decision and any written decision incorporated into it or issued contemporaneously as part of the same approval process, to the extent each such decision was made, posted or served within the statutory appeal period. The Province has separately confirmed an approval under the Environmental Protection Act. No order of the Lieutenant Governor in Council under subsection 28(2) of the Planning Act curtailing this appeal has been disclosed. The Appellants require production of any such order and do not purport to appeal the environmental approval itself or an unidentified future permit or approval.

4. Particularization after production. The Appellants reserve the right, with leave if required, to further particularize the legal description, statutory stage and conditions of the appealed decision after production of the signed decision, approved plans and complete Appeal Record.

PART II - APPELLANTS AND STANDING

5. Ownership and occupation. The Appellants hold title to PID 921791 as joint tenants under a deed dated March 6, 2024 and registered March 7, 2024. An occupancy permit was issued for the dwelling on September 16, 2025. The Appellants occupy the approximately 16.19-acre coastal property at 12360 Northside Road, Monticello, as their full-time residence. Their property is immediately adjacent to or in unusually close proximity to the lands and course components affected by the decision.

6. Statutory standing. Each Appellant is an aggrieved person within paragraph 27.1(d) of the Planning Act because each, in good faith, believes the decision will adversely affect the reasonable enjoyment of property owned and occupied by them.

7. Objective and site-specific basis. The October 10, 2025 Departmental notice stated that only property owners within 100 metres of the subject property would receive a letter, and the notice was sent to the Appellants. That is government-generated evidence that PID 921791 was treated as falling within the immediate notice radius. The registered deed and survey, occupancy permit, permit site plans and land-use plan further identify an occupied coastal home, private well, on-site sewage system, home-based work and artistic uses, gardens and orchard development, reforestation, greenhouse and storage areas, and substantial outdoor use.

8. Decision-linked adverse effects. Available cadastral mapping and preliminary site plans place the project lands along the western side of the Appellants' parcel and indicate proposed playing or operational areas near the boundary, although exact distances and the final approved routing require professional confirmation. The reasonably apprehended effects include errant golf balls; intrusive play, maintenance, pump, vehicle and construction noise; early-morning and evening disturbance; trespass and security impacts; altered drainage, erosion or flooding; interference with well-water quantity or quality; and pesticide, fertilizer, sediment or other runoff through a credible site pathway. The Appellants will support these matters with survey, mapping, photographic, affidavit and expert evidence as appropriate.

9. Excluded generalized claims. The Appellants do not rely for standing on generalized opposition to golf courses, loss of view, commercial competition, an unparticularized decline in property value, or generalized medical causation. Any such matter will be advanced only if it becomes legally relevant and is supported by admissible expert evidence.

PART III - GROUNDS OF APPEAL

10. Failure to identify the legal decision and give intelligible reasons. The public posting and materials served to date do not disclose the signed decision, statutory source, approval stage, approved plan, conditions, delegation or reasons. The Minister failed to provide a transparent and intelligible basis showing what was approved, under what authority, and why the applicable statutory and regulatory criteria were satisfied.

11. Failure to decide the actual and complete proposal. The approval process appears to have evolved from a nine-hole golf-course proposal involving PIDs 812917 and 812941 into a materially revised twelve-hole proposal involving PIDs 812917, 812941 and 115519. The Minister failed to ensure that the decision was made on a complete, current and internally consistent application reflecting the proposal actually intended to be constructed and operated.

12. Inadequate treatment of material redesign. The prior nine-hole proposal was withdrawn or replaced following public and technical review. If the Appeal Record confirms material changes to the

number and location of holes, affected parcels, wetland or coastal encroachments, irrigation, access, parking, maintenance facilities or other project components, the Minister failed to require a fresh and complete assessment of those changes and failed to explain whether renewed agency referral, notice or consultation was required.

13. Procedural fairness and meaningful participation. The October 10, 2025 notice concerned the earlier nine-hole proposal, set a November 7 comment deadline, stated that a non-response would be treated as no objection, and advised that only owners within 100 metres would be notified. The Appellants allege the mailed notice was actually received after the October 29 public meeting and the stated comment deadline, although they independently attended and the Department later accepted comments. The Minister failed to demonstrate when notice was mailed or received, whether the Appellants' submissions were before and considered by the decision-maker, and whether the materially revised twelve-hole proposal required renewed notice, referral or a further opportunity for affected adjoining owners to address the actual proposal before approval.

14. Sound planning principles and suitability. The approval is inconsistent with sections 3 and 13 of the Subdivision and Development Regulations, and with the applicable change-of-use and development-permit requirements, because the record does not demonstrate that the land and proposed lot configuration are suitable for the expressly identified golf-course use, having regard to compatibility with surrounding uses, topography, drainage and effects on adjoining land, traffic and access, utilities and services, wastewater, water supply and natural features.

15. Failure to assess compatibility with established residential use. The Minister failed to rationally assess whether a commercial golf course, its routing and its associated parking, maintenance, irrigation, traffic and operational activities are compatible with the Appellants' pre-existing full-time residence, home-based work, artistic work, gardens, orchard, reforestation and outdoor uses, or to identify evidence-based setbacks, barriers, routing changes or operating conditions sufficient to address the conflict.

16. Inadequate application information. The Minister failed to require, obtain or assess information reasonably necessary to evaluate the proposal under the Regulations, including a complete final twelve-hole course plan; legal survey and parcel configuration; final grading and topography; drainage and stormwater design; irrigation design and water budget; water-source and well information; hydrogeological analysis; wetland, watercourse and coastal delineation; erosion and sediment controls; traffic and entrance information; sewage and servicing; golf-ball safety; noise; security; and operating and maintenance parameters.

17. Improper deferral of essential design. The Minister of Land and Environment stated in correspondence dated June 11, 2026 that more detailed design elements may continue to be finalized through subsequent permitting processes. To the extent core planning matters - including final routing, irrigation, grading, drainage, wetland and coastal layout, access, parking, servicing, safety or mitigation - were unresolved when the June 4 decision was made, the Minister approved an indeterminate proposal and deferred matters necessary to the statutory planning analysis without defined parameters, renewed review, notice or an effective opportunity to appeal the later design.

18. Water supply and groundwater effects. The proposal contemplates substantial irrigation demand in a coastal area. The Minister failed to obtain or assess competent evidence respecting sustainable yield, cumulative water use, seasonal drought, salt-water intrusion, neighbouring wells, wetland hydrology and the relationship between water withdrawal, irrigation return flow and the Appellants' private well and on-site sewage system, or to establish appropriate baseline and ongoing monitoring.

19. Wetland, watercourse and coastal features. The Province has represented that the project received Environmental Impact Assessment approval subject to specific Ministerial conditions, that the approved project was modified to avoid major wetland impacts, and that no wetland compensation was required.

Those conditions, modification plans and calculations have not been disclosed. Without inviting a free-standing appeal of the environmental approval, the Appellants allege that the Minister failed to establish that the June 4 planning decision concerned the same final modified plan, accurately identified the remaining wetland, watercourse and coastal disturbance, and incorporated or otherwise secured the conditions on which the planning analysis relied.

20. Species-at-risk and reliability of technical materials. The project description and related materials appear to have confused Bank Swallows with Cliff Swallows and to have relied on mitigation developed for a different species or context. The Minister failed to resolve material errors and inconsistencies in the technical record before relying on it, and failed to demonstrate that species-specific mitigation was adequate, enforceable and compatible with the course operating season.

21. Drainage, grading and adjoining-property effects. The Minister failed to assess the final post-construction grading, surface-water pathways, storm events, erosion, sediment movement and potential effects on the Appellants' lands, well, on-site sewage system, gardens, orchard, reforestation and outdoor-use areas. Approval without a final grading and drainage basis was premature and inconsistent with the mandatory suitability analysis.

22. Golf-ball safety and public safety. The Minister failed to obtain or assess a professional routing and shot-dispersion analysis addressing the location of tees, landing areas and greens relative to the Appellants' boundary, residence and occupied outdoor areas; the foreseeable range and direction of errant balls; appropriate setbacks, orientation, barriers or netting; and the risk created by the apparent proximity of playing areas to an existing residence.

23. Noise and operational compatibility. The Minister failed to obtain or assess competent evidence concerning construction noise, impulsive golf-ball impact noise, player noise, mowing, irrigation pumps, maintenance activity, vehicles, deliveries, parking and early-morning or evening operations. The Minister further failed to establish enforceable limits concerning hours, equipment, routing, screening and other mitigation necessary to protect the reasonable enjoyment of adjoining residential and home-work uses.

24. Security, trespass and access. The Minister failed to adequately assess parking, access, fencing, signage, trespass prevention, retrieval of balls from adjoining or protected lands, emergency access, public access along any former shore road, and the legal authority to use or cross any Crown-owned strip or former road required by the project.

25. Unenforceable or undocumented mitigation representations. The Developer represented, among other things, that the course would be walking-only, would not use carts, would use fescue, would reduce water, fertilizer and pesticide use, would use electric maintenance equipment, and would restrict player access to buffer areas. To the extent the Minister relied on such representations, the Minister erred by failing to document them accurately and secure them through clear, measurable and enforceable conditions or a development agreement.

26. Failure to impose adequate conditions and monitoring. The decision and present record do not demonstrate conditions proportionate to the identified risks, plan-change controls, compliance monitoring, reporting, inspection rights, contingency measures, neighbouring-well monitoring or financial security where authorized. The existence of separate and presently undisclosed Environmental Impact Assessment conditions does not cure the planning decision unless the Minister established their content, applicability, enforceability and relationship to the final planning plan.

27. Segmentation and cumulative effects. The Minister failed to assess the practical and cumulative effects of the subdivision, change of use, course layout, parking, maintenance, irrigation, water withdrawal, drainage, access, wetland crossings and related facilities as an integrated development. The project was instead segmented among the Environmental Impact Assessment, subdivision, change-of-use,

development-permit and later permitting processes in a manner that prevented a complete suitability and compatibility analysis and obscured which final plan was actually approved.

28. Required outside approvals and prematurity. Section 5 of the Regulations requires specified outside approvals to be obtained, as appropriate, before approval under the Regulations. The Province has confirmed that an Environmental Impact Assessment approval existed, but the approval, date, final plan and conditions have not been produced. The Minister failed to demonstrate that the same project plan was approved in each process and that all other approvals required at that stage - including any Lands Protection Act, Roads Act, Fire Prevention Act, Crown-land or other prerequisite authorization - were in place. The Appellants do not ask the Commission to determine a free-standing environmental or other regulatory appeal outside its jurisdiction.

29. Lands Protection Act and title conditions. Published Executive Council orders concerning acquisitions by Sticks and Stones Developments Inc. appear to contain conditions that certain real property not be subdivided. If File 64362 subdivides, consolidates, attaches or otherwise alters a parcel subject to such a condition, and no valid variation or cancellation exists, the Minister failed to establish that the approval was legally available. Final particulars are reserved pending production of title records, surveys, Executive Council orders and any variations.

30. Crown land and former shore road. The Minister failed to establish the Developer's legal authority over every area required for the course, access, pathways, utilities or related works, including any former shore road or Crown-owned strip traversing or adjoining the project lands, and failed to address the effect of the approval on lawful access and public safety.

31. Prior site work and compliance history. The Appellants observed significant cutting or clearing, excavation, grading and sand importation or stockpiling beginning around March 2025, winter logging on land later associated with the revised proposal, and renewed clearing, excavation, grading and sand importation in spring 2026. The Appellants do not allege that every observed activity was unauthorized. They allege that the Minister failed to obtain and consider the complete inspection, stop-work, enforcement and compliance history, and to determine whether site conditions, application information and proposed mitigation accurately reflected work already undertaken.

32. Failure to consider relevant evidence. The Minister failed to demonstrate a transparent assessment of the Appellants' submissions, the official 100-metre notice relationship, neighbouring land-use conflicts, technical-review comments, agency advice, project revisions, prior compliance concerns and the reliability of the Developer's technical materials.

33. Irrelevant or unsupported considerations. To the extent the decision relied on generalized community support, unverified economic benefit, the Developer's personal intentions, or non-binding statements of environmental responsibility, the Minister relied on considerations incapable of replacing the statutory suitability, compatibility and evidentiary analysis.

34. Unreasonableness. The decision was unreasonable because the outcome and reasoning, viewed against the statutory scheme and the evidence required for a coastal golf-course development beside an established occupied residence, do not demonstrate a rational chain of analysis, an adequate and final evidentiary foundation, or meaningful engagement with the principal constraints and risks.

35. Further particulars. These grounds are pleaded on the information presently available. The Appellants reserve the right, subject to Rule 27 and Commission direction, to add or refine particulars disclosed by the signed decision, complete applications, prior nine-hole file, final twelve-hole plan, Environmental Impact Assessment approval and conditions, technical-review materials, title documents, agency referrals, consultant reports, inspection records, later permits, correspondence and approval conditions.

PART IV - RELIEF REQUESTED

- (a) An order allowing the appeal and rescinding the June 4, 2026 decision;
- (b) Alternatively, an order varying the decision or remitting the application to the Minister for a fresh determination on a complete and current application, in accordance with the Planning Act, the Regulations and procedural fairness;
- (c) A direction that the Respondent file a complete and certified Appeal Record, including the signed decision, reasons, delegation, conditions, complete application history, all plan versions, Case #2025-018 materials, the prior nine-hole file, the Environmental Impact Assessment approval and conditions, wetland-avoidance modifications, inspection records, subsequent permit and plan-version records, any subsection 28(2) order, title and Executive Council materials, technical-review records, agency referrals, reports, notes and correspondence, together with a privilege log identifying any withheld document;
- (d) A preliminary conference or hearing to determine standing, identify the precise decision and approval stage, resolve Appeal Record and disclosure deficiencies, settle the issues and establish directions for expert evidence and the merits hearing;
- (e) Interrogatories or other procedural directions if material factual gaps remain after completion of the Appeal Record;
- (f) If the decision is not rescinded, such lawful and evidence-based conditions as are necessary respecting the controlling course plan, future plan-change approval, course routing, setbacks, errant-ball protection, water use, baseline and ongoing well monitoring, drainage, wetland and coastal protection, pesticide and fertilizer management, hours of operation, noise, lighting, access, parking, security, compliance monitoring and financial security where authorized;
- (g) A finding or declaration, to the extent within the Commission's jurisdiction, that the subdivision approval does not itself authorize construction, site alteration, water withdrawal, wetland or watercourse alteration, pesticide application, buildings, sewage systems, highway-access changes, food or beverage operations, or any activity requiring a separate permit or approval; and
- (h) Such further relief within the Commission's jurisdiction as is just.

PART V - DATE, CONTACT INFORMATION AND SERVICE

The original Notice was dated June 21, 2025. The reference to 2025 was a clerical error. The correct date of the original Notice is June 21, 2026.

DATED at Charlottetown, Prince Edward Island, this 20th day of July, 2026.

Isaac Quinn
 Counsel for James Jordan and Suzanne Jordan
 Quinn Law Inc.
 129 Water Street
 Charlottetown, PE C1A 1A8
 isaac@quinn-law.ca | 902-569-0038

TO: Prince Edward Island Regulatory & Appeals Commission

AND TO: Minister of Land and Environment, c/o Eugene Lloyd, Manager, Development Control

AND TO: Sticks and Stones Developments Inc.

SCHEDULE A - PARTICULARS TO BE SUPPORTED BY EVIDENCE

- Registered title to PID 921791 in the Appellants as joint tenants, the September 16, 2025 occupancy permit, and continuous full-time occupation of the residence;
- The October 10, 2025 Departmental notice stating that only property owners within 100 metres of the subject property would receive a letter, together with the original notice and envelope;
- The registered survey, deed description, permit site plans and land-use plan locating the residence, boundary, well, on-site sewage system, shoreline, wetland, abandoned road, gardens, orchard, reforestation, greenhouse, storage and outdoor-use areas;
- The Appellants' present residential, home-based contract, artistic, gardening, orchard, reforestation and outdoor uses, distinguishing existing uses from future plans;
- Certified survey, GIS or professional measurement of the distance and orientation between the Appellants' lands and the final approved course components;
- The final twelve-hole routing and the location of tees, landing areas, greens, parking, maintenance, pumps, wells, pathways, bridges and access points;
- Existing drainage, wetland, watercourse and coastal pathways, including any observed ponding, erosion or water movement;
- Existing ambient sound conditions and the location and timing of noise-sensitive residential, home-work, artistic and outdoor uses;
- Original message exports, emails, public-meeting materials, full-resolution photographs and drone images documenting representations, project changes and site conditions; and
- Observed cutting, clearing, grading, excavation, logging, sand importation, stockpiling, access or other work, with the most accurate available dates, locations and photographs.

SCHEDULE B - MATTERS RESERVED PENDING THE APPEAL RECORD

- The signed June 4, 2026 decision, reasons, conditions, delegation and preliminary or final status;
- The relationship between File 64362, Case #2025-018, the Environmental Impact Assessment approval and any contemporaneous development or change-of-use approval;
- Whether any order under subsection 28(2) of the Planning Act exists or is asserted to curtail this appeal;
- The signed Environmental Impact Assessment approval, the final plan and project description to which it applies, and every specific Ministerial condition;
- The modifications said to avoid major wetland impacts, the no-compensation determination, and the inspection record supporting shoreline, buffer and compliance conclusions;
- Every detailed design element deferred to later permitting, and every subsequent permit application, plan, condition, approval or outstanding requirement;
- The complete parcel, title and survey history for PIDs 812917, 812941 and 115519;
- The application of any Lands Protection Act condition and any variation or cancellation;
- The complete nine-hole application, its withdrawal, and every subsequent twelve-hole revision;
- All technical-review committee materials and the Developer's responses;
- All existing consultant reports, agency referrals, environmental screening, inspection records, permits and approvals;
- The complete public-notice and public-meeting records, evidence that the Appellants' submissions were considered, and any related appealable decision for PID 812941 or PID 115519 made within the statutory appeal period.

**PRINCE EDWARD ISLAND
REGULATORY AND APPEALS COMMISSION**

**APPEAL LA26008
PROCEEDING COMMENCED AT
CHARLOTTETOWN, QUEENS COUNTY,
PRINCE EDWARD ISLAND**

PROPOSED AMENDED NOTICE OF APPEAL



Quinn Law

A LITIGATION BOUTIQUE

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CANADA
PROVINCE OF PRINCE EDWARD ISLAND

IN THE MATTER OF THE
PLANNING ACT, R.S.P.E.I. 1988, c. P-8
AND IN THE MATTER OF APPEAL LA26008 BEFORE THE
PRINCE EDWARD ISLAND REGULATORY AND APPEALS COMMISSION

BETWEEN:

JAMES JORDAN and SUZANNE JORDAN
Appellants

AND:

MINISTER OF LAND AND ENVIRONMENT
Respondent

AND:

STICKS AND STONES DEVELOPMENTS INC.
Developer

COUNSEL'S CONCORDANCE AND SCHEDULE OF AMENDMENTS AND ENCLOSURES

(Commission Rule 27)

PART I - PURPOSE AND FILING POSITION

1. This concordance is provided to assist the Commission and the parties in reviewing the Appellants' proposed amendment under Rule 27. The original Notice was filed by the Appellants while self-represented and before they had the signed decision, the Appeal Record, or legal advice. The proposed amendment concerns the same Appellants and the same June 4, 2026 decision in Appeal LA26008. It adds no party, withdraws no appeal, and is intended to supersede the original Notice as the operative pleading while preserving the original filing date and continuity of the appeal.
2. Because the proposed amendment is a wholesale redraft, the Rule 27 marked copy uses a full-deletion/full-addition convention: the substantive wording of the original Notice is shown in strike-through and the complete replacement pleading is shown in underline. A clean copy is provided for ease of reading. The original signed Notice and its planning-decision printout remain part of the Commission record.
3. The amendment narrows or removes allegations that should not be advanced without expert evidence, particularizes standing and decision-linked effects, identifies the legal and procedural issues more precisely, and reserves further particulars pending production of the complete Appeal Record.

PART II - CONCORDANCE OF THE ORIGINAL NOTICE AND THE AMENDED NOTICE

ORIGINAL NOTICE MATERIAL	AMENDED NOTICE	TREATMENT AND REASON
Decision challenged and project parcels	Paras. 1-4	Recasts the original description of a rezoning/golf-course approval by identifying File 64362, Case #2025-018, the June 4, 2026 decision, the nine-hole and twelve-hole histories, the relevant PIDs, and the need to determine the precise statutory decision and approval stage.
Standing / "aggrieved person"	Paras. 5-9	Particularizes registered ownership, occupancy, the Department's 100-metre notice radius, site-specific residential and land uses, and decision-linked adverse effects. Expressly excludes generalized property-value, view, commercial, and medical-causation claims unless later supported and legally relevant.

ORIGINAL NOTICE MATERIAL	AMENDED NOTICE	TREATMENT AND REASON
Residential and land-use conflict	Paras. 5, 7-8, 14-15; Sch. A	Preserves the original reliance on full-time residence, home-based work, small-scale agricultural and reforestation uses, while grounding those matters in the statutory suitability and compatibility analysis.
Provincial land / former shore road	Paras. 24, 30; Sch. B	Preserves and particularizes the original Crown-land concern as a title, access, authority, public-safety, and former-road issue pending production of the relevant land records.
General allegation that approval should have been denied	Paras. 10-35	Replaces a generalized legality objection with defined grounds concerning reasons, completeness, redesign, fairness, planning criteria, technical evidence, deferral, environmental-plan consistency, title, compliance history, and reasonableness.
Immediate adjacency / incompatibility	Paras. 7-8, 14-17, 22-24	Retains the core concern but avoids asserting that the development is categorically unprecedented. Focuses on evidence-based compatibility, setbacks, routing, safety, noise, access, and mitigation.
Relief: development "disallowed"	Paras. 36-43	Reframes the requested relief within the Commission's jurisdiction: rescission, variation, remittal, completion of the Appeal Record, preliminary directions, conditions, and clarification of what the approval does not authorize.
Original date stated as June 21, 2025	Para. 44	Identifies the year 2025 as a clerical error and confirms the correct original date as June 21, 2026.
Signatures, service and counsel information	Part V	Replaces self-represented contact and signature information with counsel's execution and service particulars, without changing the identity of the Appellants.

PART III - CONCORDANCE OF THE ORIGINAL NUISANCE PARTICULARS

ORIGINAL PARTICULAR	AMENDED NOTICE	TREATMENT
Errant golf balls	Paras. 8, 22, 41	Retained and particularized through routing, shot-dispersion, setbacks, barriers, netting, and professional safety evidence.
Construction noise and dust	Paras. 8, 23, 31, 41	Retained, linked to construction and compliance records, and tied to enforceable mitigation.
Operational and maintenance noise	Paras. 8, 15, 23, 41	Retained and particularized by source, timing, hours, equipment, screening, and home-work impacts.
Trespass along the common boundary	Paras. 8, 24, 41	Retained and expanded to include ball retrieval, fencing, signage, public access, and security controls.
Personal and property security	Paras. 8, 24, 41	Retained as a site-specific operational and access issue.
Restaurant odour	Not pleaded as a stand-alone ground	Not presently advanced without an identified approved restaurant design, servicing record, or evidence of a material planning impact. Related servicing and operational records remain requested.
Diminished property value	Para. 9	Expressly not relied upon for standing or merits unless later shown to be legally relevant and supported by admissible expert evidence.
Increased home-insurance cost	Not presently pleaded	Removed as speculative and unsupported. May be revisited only if competent evidence and legal relevance emerge.
Groundwater and well contamination / quantity	Paras. 8, 18, 21, 26, 41	Retained and reframed as water demand, hydrogeology, monitoring, drainage, and credible pathway issues.
Crop and garden contamination	Paras. 8, 15, 21, 25-26, 41	Retained only as a site-specific runoff, pesticide, fertilizer, drainage, mitigation, and monitoring issue.
Flooding or septic-system impacts	Paras. 8, 18, 21, 41	Retained and linked to final grading, drainage, stormwater, water withdrawal, and on-site sewage evidence.

ORIGINAL PARTICULAR	AMENDED NOTICE	TREATMENT
Cancer / Parkinson's disease allegations	Para. 9	Expressly excluded absent admissible expert evidence and legal relevance.
Interference with livelihood from noise	Paras. 7-8, 15, 23; Sch. A	Retained as interference with identified home-based contract and artistic work, subject to proof of use and noise effects.

PART IV - NEWLY PARTICULARIZED GROUNDS

GROUND	AMENDED NOTICE	PURPOSE
Decision identity, authority and reasons	Paras. 10, 34	Added because the signed decision, statutory source, approval stage, approved plan, conditions, delegation, and reasons have not been disclosed.
Complete proposal and material redesign	Paras. 11-13	Added to address the evolution from the nine-hole proposal to a materially revised twelve-hole proposal and the adequacy of renewed review and participation.
Mandatory planning criteria and incomplete information	Paras. 14-16	Added to connect the appeal to suitability, compatibility, drainage, servicing, access, water, natural features, and the completeness of the application record.
Improper deferral of essential design	Para. 17	Added in light of the Province's statement that detailed design could be finalized through later permitting.
Water, wetlands, coast and environmental-plan consistency	Paras. 18-21	Added to require proof that the planning decision concerned the same final plan and conditions as the environmental approval and adequately addressed water and drainage effects.
Safety, noise, security and access	Paras. 22-24	Particularizes the core neighbour impacts by reference to objective plans, assessments, and enforceable controls.
Representations, conditions and monitoring	Paras. 25-26	Added to distinguish voluntary statements from enforceable conditions and to seek plan-change controls, monitoring, and compliance measures.
Segmentation and outside approvals	Paras. 27-28	Added to address the cumulative development and the relationship among subdivision, change of use, development, environmental, water, and other approvals.
Lands Protection Act, title and Crown land	Paras. 29-30	Particularizes legal availability, title, subdivision conditions, and authority over any former road or Crown strip.
Prior work and compliance history	Para. 31	Added cautiously to require the inspection, stop-work, enforcement, and compliance record without alleging that every observed activity was unauthorized.
Relevant evidence, unsupported considerations and reasonableness	Paras. 32-34	Added to frame review of the decision-making process and evidentiary foundation.
Further particulars after the record	Para. 35; Schs. A-B	Reserves targeted refinement after production while identifying the evidence the Appellants expect to adduce and the matters still within the Respondent's record.

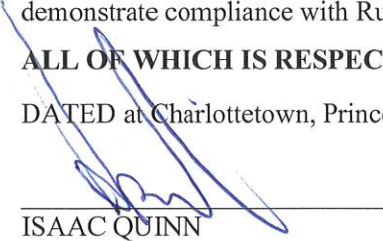
PART V - SCHEDULE OF ENCLOSURES / FILING PACKAGE

1. Disclosure and Complete Appeal Record Request dated July 20, 2026;
2. Proposed Amended Notice of Appeal - clean copy;
3. Proposed Amended Notice of Appeal - Rule 27 marked copy;
4. Counsel's Concordance and Schedule of Amendments and Enclosures; and
5. Original Notice of Appeal and its attachment - included for reference, although the original is already in the Commission record.

The same enclosure package should be served on the Respondent and the Developer. The clean Amended Notice is intended to be the operative pleading; the marked copy and this concordance are provided to demonstrate compliance with Rule 27 and to assist review.

ALL OF WHICH IS RESPECTFULLY SUBMITTED.

DATED at Charlottetown, Prince Edward Island, this 20th day of July, 2026.



ISAAC QUINN

Quinn Law Inc.

Counsel for the Appellants

**PRINCE EDWARD ISLAND
REGULATORY AND APPEALS COMMISSION**

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