



Ontario  
Securities  
Commission

Commission des  
valeurs mobilières  
de l'Ontario

22<sup>nd</sup> Floor  
20 Queen Street West  
Toronto ON M5H 3S8

22e étage  
20, rue queen ouest  
Toronto ON M5H 3S8

File No.:

**IN THE MATTER OF**

**STRIKE HOLDINGS INC., KM STRIKE MANAGEMENT INC.,  
MICHAEL AONSO AND KEVIN CARMICHAEL**

**MOTION OF STAFF**

**OF THE ONTARIO SECURITIES COMMISSION**

(For Extension of a Temporary Order Under Subsections 127(8) and 127(1)  
of the *Securities Act*, RSO 1990 c S.5)

**A. ORDER SOUGHT**

The Applicant, Staff of the Ontario Securities Commission (**Staff**), requests that the Ontario Securities Commission (the **Commission**) make the following orders:

1. An Order extending the Temporary Order of the Commission dated May 3, 2021 signed by Commissioner Haber at a Hearing conducted on May 3, 2021, made with respect to Strike Holdings Inc., (**Strike Holdings**), KM Strike Management Inc., (**KMSM**), Michael Aonso (**Aonso**) and Kevin Carmichael (**Carmichael**) for such period as it considers necessary if satisfactory information is not provided to the Commission within the fifteen-day period pursuant to subsection 127(8) of the *Securities Act*, RSO 1990, c S.5 (the **Act**).
2. If necessary, an Order abridging the time required for service pursuant to Rules 3 and 4(2) of the Ontario Securities Commission *Rules of Procedure*; and
3. Such other Order as the Commission considers appropriate in the public interest.

## B. GROUNDS

The grounds for the request are:

1. In July 2020, Staff commenced an investigation into Strike Holdings, KMSM, Aonso and Carmichael;
2. During the course of the investigation, Staff found evidence that Strike Holdings, KMSM, Aonso and Carmichael appeared to have traded securities without registration and without an exemption to the registration requirement, and without a prospectus having been filed or receipted and without an applicable exemption to the prospectus requirement contrary to subsections 25(1) and 53(1) of the Act, respectively;
3. Staff are also investigating whether Strike Holdings, KMSM, Aonso and Carmichael have engaged in a course of conduct relating to securities that they know, or reasonably ought to know, perpetrates a fraud on any person or company, contrary to subsection 126.1(1)(b) of the Act;
4. On April 21, 2021, the Commission issued a temporary Order (the **Temporary Order**);
5. The Temporary Order provided that:
  - (a) pursuant to clause 2 of subsection 127(1) of the Act, all trading in any securities by Respondents shall cease;
  - (b) pursuant to clause 3 of subsection 127(1) of the Act, that the exemptions contained in Ontario securities law do not apply to the Respondents; and
  - (c) pursuant to subsection 127(6) of the Act, that this order shall take effect immediately and shall expire on the 15th day after its making unless extended by order of the Commission;
6. On May 3, 2021 the Temporary Order was extended by the Commission pursuant to subsection 127(8) and paragraph 2 of subsection 127(1) of the Act until June 2, 2021.
7. The investigation into the conduct described in the Temporary Order and this Application is continuing;

8. The Order sought by Staff is necessary to protect investors from serious and ongoing harm and is in the public interest;
9. Subsections 127(1) and 127(8) of the Act; and
10. Such further grounds as counsel may advise and the Commission may permit.

### **C. DOCUMENTS TO BE RELIED UPON**

The Applicant intends to rely on the following evidence at the Hearing:

1. The Affidavit of Wayne Vanderlaan, to be filed; and
2. Such further evidence as counsel may advise and the Commission may permit.

**Date:** May 26, 2021

**STAFF OF THE  
ONTARIO SECURITIES COMMISSION**

**Dihim Emami**  
Senior Litigation Counsel  
Enforcement Branch  
LSO No. 57402S

Tel: 416-596-4253  
Fax: 416-593-2319  
Email: [demami@osc.gov.on.ca](mailto:demami@osc.gov.on.ca)