



Ontario  
Securities  
Commission

Commission des  
valeurs mobilières  
de l'Ontario

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

**- and -**

**IN THE MATTER OF  
NATURAL BEE WORKS APIARIES INC., RINALDO LANDUCCI  
and TAWLIA CHICKALO**

**APPLICATION OF STAFF  
OF THE ONTARIO SECURITIES COMMISSION**

(For Extension of a Temporary Order under Subsection 127(8) of the *Securities Act*)

**A. ORDER SOUGHT**

The Applicant, Staff of the Ontario Securities Commission (“**Staff**”), request that the Ontario Securities Commission make the following order(s):

1. An order extending the temporary order dated February 8, 2018 (“**Temporary Order**”) as against Natural Bee Works Apiaries Inc. (“**NBW**”), Rinaldo Landucci (“**Landucci**”) and Tawlia Chickalo (“**Chickalo**”) (collectively, the “**Proposed Respondents**”) until the hearing in this matter is concluded, or if no hearing is commenced before the return of this application, for an addition 30 days; and
2. Such other orders as Staff may request and the Commission considers appropriate.

**B. GROUNDS**

1. On February 26, 2018, the Commission made an order extending the Temporary Order to June 27, 2018 (the “**Extension Order**”) in the context of an application made by Staff (the “**Initial Application**”);
2. In support of the Initial Application, Staff relied on evidence which indicates that the Proposed Respondents may have acted and may have been continuing to act contrary to the

public interest and in breach of the *Securities Act*, RSO 1990, c. S.5 (the “Act”). The Proposed Respondents filed no evidence in response to the Initial Application;

3. Staff are now in a position to commence enforcement proceedings against the Proposed Respondents;
4. On May 31, 2018, Staff served Enforcement Notices on the Proposed Respondents;
5. The alleged violations in the Enforcement Notices are supported by the evidence obtained by Staff in its investigation, including the evidence relied on by Staff on the Initial Application. The evidence obtained since the Extension Order supports and adds precision to the evidence relied on by Staff on the Initial Application;
6. The Enforcement Notices stipulate that any response which the Proposed Respondents would like Staff to consider before deciding whether to commence proceedings against them was required by June 13, 2018;
7. Subject to any such responses, Staff were anticipating issuing a Statement of Allegations against the Proposed Respondents on or about June 14, 2018;
8. At the request of Chickalo on behalf of the Proposed Respondents, the deadline for any responses to the Enforcement Notices has now been extended to June 21, 2018.
9. Subsection 127(8) of the Act;
10. Rule 13 of the *Rules of Procedure*;
11. Such further and other grounds as Staff may advise and the Commission may permit.

**C. EVIDENCE**

1. Affidavit of Laura Lavalley, sworn June 14, 2018;
2. Order of the Commission dated February 26, 2018;
3. Application Record of Staff filed in respect of the Initial Application; and

4. Supplementary Application Record of Staff filed in respect of the Initial Application.

**DATED** this 15<sup>th</sup> day of June, 2018.

Ontario Securities Commission  
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**AND TO:** **NATURAL BEE WORKS APIARIES INC.**  
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