File No.:

### IN THE MATTER OF

## BUFFALO GRAND HOTEL INC., STINSON HOSPITALITY MANAGEMENT INC., STINSON HOSPITALITY CORP., RESTORATION FUNDING CORPORATION, and HARRY STINSON

## APPLICATION 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 March 20, 2020 made with respect to Buffalo Grand Hotel Inc. (**BGHI**), Stinson Hospitality Management Inc. (**SHMI**), Stinson Hospitality Corp. (**SHC**), Restoration Funding Corporation (**Restoration**), and Harry Stinson (**Stinson**), 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 August 2018, Staff commenced an investigation into BGHI, SHMI, SHC, Restoration, and Stinson;

2. During the course of the investigation, Staff found evidence that BGHI, SHMI, SHC, Restoration, and Stinson 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. During the course of the investigation, Staff found evidence that one or more of BGHI, SHMI, SHC, Restoration, and Stinson appeared to have made statements that were untrue or omitted information necessary to prevent them from being false or misleading and that a reasonable investor would consider relevant in deciding whether to enter into or maintain a trading relationship with the person or company, contrary to subsection 44(2) of the Act;

4. On March 20, 2020, the Commission issued a temporary Order (the **Temporary Order**);

- 5. The Temporary Order provided that:
  - (a) all trading in any securities by BGHI, SHMI, SHC, Restoration, and Stinson or by any person on their behalf shall cease, including but not limited to any act, advertisement, solicitation, conduct, or negotiation, directly or indirectly in furtherance of a trade;
  - (b) all trading in securities related to the Buffalo Grand Hotel shall cease, including:
    - i. trading relating to Buffalo Grand Hotel suites or 'units';
    - ii. trading relating to Buffalo Grand Hotel 'wholesale room blocks';
  - (c) any exemptions contained in Ontario securities law do not apply to BGHI, SHMI,
    SHC, Restoration, and Stinson; and
  - (d) the Temporary Order shall take effect immediately and shall expire on the 15th day after its making unless extended by order of the Commission;

6. The investigation into the conduct described in the Temporary Order and this Application is continuing;

7. The Order sought by Staff is necessary to protect investors from serious and ongoing harm and is in the public interest;

- 8. Subsections 127(1) and 127(8) of the Act; and
- 9. Such further grounds as counsel may advise and the Commission may permit.

#### B. GROUNDS

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

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

**Date:** March 25, 2020

### STAFF OF THE ONTARIO SECURITIES COMMISSION

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