



Ontario  
Securities  
Commission

Commission des  
valeurs mobilières  
de l'Ontario

22nd Floor  
20 Queen Street West  
Toronto ON M5H 3S8

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

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**IN THE MATTER OF  
TCM INVESTMENTS LTD. carrying on business as  
OPTIONRALLY, LFG INVESTMENTS LTD., AD PARTNERS SOLUTIONS LTD.  
and INTERCAPITAL SM LTD.**

Timothy Moseley, Vice-Chair and Chair of the Panel

December 18, 2017

**ORDER**

Subsection 127(1) and Section 127.1 of the  
*Securities Act*, RSO 1990, c S.5

WHEREAS on November 15, 2017, the Ontario Securities Commission held a hearing at the offices of the Commission, located at 20 Queen Street West, 17th Floor, Toronto, Ontario, to consider the appropriate sanctions arising as a result of the Commission's finding that each of the Respondents contravened the *Securities Act*, RSO 1990, c S.5 (the **Act**) by engaging in the conduct alleged in paragraph 17 of the Statement of Allegations dated August 24, 2017; and

ON READING the Submissions of Staff of the Commission Respecting Sanctions and Costs dated October 31, 2017 and the Supplementary Submissions of Staff of the Commission Respecting Sanctions dated November 28, 2017 and on hearing the submissions of the representative for Staff of the Commission, no one appearing for the Respondents;

IT IS ORDERED THAT:

1. Pursuant to paragraph 2 of subsection 127(1) of the Act, trading in any securities or derivatives by the Respondents shall cease permanently;
2. Pursuant to paragraph 2.1 of subsection 127(1) of the Act, the acquisition of any securities by the Respondents is prohibited permanently;
3. Pursuant to paragraph 3 of subsection 127(1) of the Act, the exemptions contained in Ontario securities law do not apply to the Respondents permanently;
4. Pursuant to paragraph 8.5 of subsection 127(1) of the Act, the Respondents are prohibited permanently from becoming or acting as a registrant, as an investment fund manager or as a promoter;

5. Pursuant to paragraph 9 of subsection 127(1) of the Act, the Respondents, jointly and severally, shall pay to the Commission an administrative penalty of \$100,000, which amount shall be designated for allocation or use by the Commission in accordance with paragraphs b(i) or (ii) of subsection 3.4(2) of the Act;
6. Pursuant to paragraph 10 of subsection 127(1) of the Act, TCM Investments Ltd. shall disgorge to the Commission \$100,000, which amount shall be designated for allocation or use by the Commission in accordance with paragraphs b(i) or (ii) of subsection 3.4(2) of the Act; and
7. Pursuant to section 127.1 of the Act, the Respondents shall pay \$30,298.75 to the Commission to reimburse the costs of the investigation and hearing, for which they shall be jointly and severally liable.

*"Timothy Moseley"*

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Timothy Moseley