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

AND

IN THE MATTER OF RODNEY INTERNATIONAL, CHOEUN CHHEAN (ALSO KNOWN AS PAULETTE C. CHHEAN) AND MICHAEL A. GITTENS (ALSO KNOWN AS ALEXANDER M. GITTENS)

STATEMENT OF ALLEGATIONS OF STAFF OF THE ONTARIO SECURITIES COMMISSION

Staff of the Ontario Securities Commission ("Staff") make the following allegations in support of a Notice of Hearing to extend the Temporary Order dated June 4, 2008 pending completion of Staff's investigation:

I. THE RESPONDENTS

- 1. Rodney International ("Rodney") is a Sole Proprietorship registered under the *Business Names Act*. The Sole Proprietor of Rodney is Choeun Chhean (also known as Paulette C. Chhean) ("Chhean").
- 2. Chhean is an individual who resides in Windsor, Ontario.
- 3. Michael A. Gittens (also known as Alexander M. Gittens) ("Gittens") is an individual and resides in Windsor, Ontario.

II. ALLEGATIONS

4. Staff allege that:

- (a) during April and March 2008, the Respondents traded securities without being registered to trade securities in accordance with Ontario securities law contrary to section 25(1)(a) of the *Securities Act*, R.S.O. c.S.5, as amended (the "Act"); and
- (b) during April and March 2008, the Respondents traded securities which would be a distribution of the securities without a preliminary prospectus and a prospectus having been filed and receipts having been issued by the Director contrary to section 53(1) of the *Act*.

III. CONDUCT CONTRARY TO THE ONTARIO SECURITIES LAW AND CONTRARY TO THE PUBLIC INTEREST

- 5. Staff allege that the conduct alleged above constitutes conduct contrary to Ontario securities law and/or conduct contrary to the public interest.
- 6. Staff reserve the right to make such other allegations as Staff may advise and the Commission may permit.

Dated at Toronto this 5th day of June, 2008.