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

-and-

IN THE MATTER OF DENNIS WING

STATEMENT OF ALLEGATIONS OF STAFF OF THE ONTARIO SECURITIES COMMISSION

Staff of the Ontario Securities Commission ("Staff") make the following allegations:

A. Overview

1. On or about August 28, 2015, Dennis Wing ("Mr. Wing") traded securities contrary to an order made by the Ontario Securities Commission (the "Commission") on June 24, 2015 that he cease trading securities permanently and thereby breached subsection 122(1)(c) of the *Securities Act*, R.S.O. 1990, c. S.5 (as amended) (the Act).

B. The Respondent

2. Mr. Wing is a resident of Toronto.

C. Background to allegations:

- (i) The June 24, 2015 Order
- 3. On June 24, 2015, the Commission made an order against Mr. Wing that provided, among other things, that trading in any securities by him cease permanently.
 - (ii) The August 28, 2015 Trades
- 4. On August 28, 2015, Mr. Wing sold 130,000 shares of Just Energy Group Inc. from his BMO InvestorLine account 225-43929 for proceeds of \$1,040,417.

D. Conduct contrary to Ontario securities law and contrary to the public interest

- 5. By trading securities on August 28, 2015 in breach of the June 24, 2015 cease trade order made by the Commission against him, Mr. Wing violated subsection 122(1)(c) of the Act and thereby acted 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 4th day of May, 2017.