

Appendix “A” to the Information of Wayne Vanderlaan

1. On or between September 24, 2007 and February 27, 2008, in the Town of Markham, York Region and elsewhere in the Province of Ontario, Eric O’Brien, Abel Da Silva, Abraham Herbert Grossman, and Shallow Oil & Gas Inc. engaged or participated in an act, practice or course of conduct relating to securities that they knew or reasonably ought to have known perpetrated a fraud on persons to whom they traded securities of Shallow Oil & Gas Inc., contrary to section 126.1(b) of the *Securities Act* and thereby did commit an offence contrary to section 122(1)(c) of the *Securities Act*.
2. On or between September 24, 2007 and February 27, 2008, in the Town of Markham, York Region and elsewhere in the Province of Ontario, Eric O’Brien, Abel Da Silva, and Abraham Herbert Grossman, being directors or officers of Shallow Oil & Gas Inc., did authorize, permit or acquiesce in Shallow Oil & Gas Inc. engaging or participating in an act, practice or course of conduct relating to securities that they knew or reasonably ought to have known perpetrated a fraud on persons to whom they traded securities of Shallow Oil & Gas Inc., contrary to section 126.1(b) of the *Securities Act* and did thereby commit an offence contrary to section 122(3) of the *Securities Act*.
3. On or between September 24, 2007 and February 27, 2008, in the Town of Markham, York Region and elsewhere in the Province of Ontario, Eric O’Brien, Abel Da Silva, Abraham Herbert Grossman, and Shallow Oil & Gas Inc. traded in securities of Shallow Oil & Gas Inc., without being registered to trade in such securities as required by section 25(1)(a) of the *Securities Act* and thereby did commit an offence contrary to section 122(1)(c) of the *Securities Act*.
4. On or between September 24, 2007 and February 27, 2008, in the Town of Markham, York Region and elsewhere in the Province of Ontario, Eric O’Brien, Abel Da Silva, and Abraham Herbert Grossman, being directors or officers of Shallow Oil & Gas Inc., did authorize, permit or acquiesce in trades in securities of Shallow Oil & Gas Inc. without Shallow Oil & Gas Inc. being registered to trade in such securities as required by section 25(1)(a) of the *Securities Act* and did thereby commit an offence contrary to section 122(3) of the *Securities Act*.
5. On or between September 24, 2007 and February 27, 2008, in the Town of Markham, York Region and elsewhere in the Province of Ontario, Eric O’Brien, Abel Da Silva, Abraham Herbert Grossman, and Shallow Oil & Gas Inc. traded in securities of Shallow Oil & Gas Inc., where such trading was a distribution of such securities, without having filed a preliminary prospectus and prospectus and obtaining receipts for them from the Director, as required by section 53(1) of the *Securities Act* and did thereby commit an offence contrary to section 122(1)(c) of the *Securities Act*.

6. On or between September 24, 2007 and February 27, 2008, in the Town of Markham, York Region and elsewhere in the Province of Ontario, Eric O'Brien, Abel Da Silva, and Abraham Herbert Grossman, being directors or officers of Shallow Oil & Gas Inc., did authorize, permit or acquiesce in trades in securities of Shallow Oil & Gas Inc. by Shallow Oil & Gas Inc. where such trading was a distribution of such securities, without having filed a preliminary prospectus and prospectus and obtaining receipts for them from the Director, as required by section 53(1) of the *Securities Act* and did thereby commit an offence contrary to section 122(3) of the *Securities Act*.
7. On or between September 24, 2007 and February 27, 2008, in the Town of Markham, York Region and elsewhere in the Province of Ontario, Eric O'Brien, Abel Da Silva, Abraham Herbert Grossman, and Shallow Oil & Gas Inc., with the intention of effecting trades in securities of Shallow Oil & Gas Inc., gave undertakings as to the future value or price of securities of Shallow Oil & Gas Inc. contrary to section 38(2) of the *Securities Act* and did thereby commit an offence contrary to section 122(1)(c) of the *Securities Act*.
8. On or between September 24, 2007 and February 27, 2008, in the Town of Markham, York Region and elsewhere in the Province of Ontario, Eric O'Brien, Abel Da Silva, and Abraham Herbert Grossman, being directors or officers of Shallow Oil & Gas Inc., did authorize permit or acquiesce in the giving of undertakings by Shallow Oil & Gas Inc., with the intention of effecting trades in securities of Shallow Oil & Gas Inc., as to the future value or price of securities of Shallow Oil & Gas Inc. contrary to section 38(2) of the *Securities Act* and did thereby commit an offence contrary to section 122(3) of the *Securities Act*.
9. On or between September 24, 2007 and February 27, 2008, in the Town of Markham, York Region and elsewhere in the Province of Ontario, Eric O'Brien, Abel Da Silva, Abraham Herbert Grossman, and Shallow Oil & Gas Inc., with the intention of effecting trades in securities of Shallow Oil & Gas Inc., made representations that securities of Shallow Oil & Gas Inc. would be listed on a stock exchange contrary to section 38(3) of the *Securities Act* and did thereby commit an offence contrary to section 122(1)(c) of the *Securities Act*.
10. On or between September 24, 2007 and February 27, 2008, in the Town of Markham, York Region and elsewhere in the Province of Ontario, Eric O'Brien, Abel Da Silva, and Abraham Herbert Grossman, being directors or officers of Shallow Oil & Gas Inc., did authorize permit or acquiesce in the making of representations by Shallow Oil & Gas Inc., with the intention of effecting trades in securities of Shallow Oil & Gas Inc., that securities of Shallow Oil & Gas Inc. would be listed on a stock exchange contrary to section 38(3) of the *Securities Act* and did thereby commit an offence contrary to section 122(3) of the *Securities Act*.

11. On or between September 24, 2007 and February 27, 2008, in the Town of Markham, York Region and elsewhere in the Province of Ontario, Eric O'Brien did contravene Ontario securities law by trading in securities of Shallow Oil & Gas Inc. at a time when he was prohibited from trading in securities by order of the Ontario Securities Commission dated July 3, 2007 and did thereby commit an offence contrary to section 122(1)(c) of the *Securities Act*.
12. On or between September 24, 2007 and February 27, 2008, in the Town of Markham, York Region and elsewhere in the Province of Ontario, Abel Da Silva did contravene Ontario securities law by trading in securities of Shallow Oil & Gas Inc. at a time when he was prohibited from trading in securities by order of the Ontario Securities Commission dated May 10, 2006 and did thereby commit an offence contrary to section 122(1)(c) of the *Securities Act*.
13. On or between September 24, 2007 and February 27, 2008, in the Town of Markham, York Region and elsewhere in the Province of Ontario, Abraham Herbert Grossman did contravene Ontario securities law by trading in securities of Shallow Oil & Gas Inc. at a time when he was prohibited from trading in securities by order of the Ontario Securities Commission dated January 24, 2006 and did thereby commit an offence contrary to section 122(1)(c) of the *Securities Act*.
14. On or about December 18, 2007, in the City of Toronto, in the Province of Ontario, Abel Da Silva made a statement in an affidavit provided to the Ontario Securities Commission, to wit: "I have not engaged in any business or undertaking which is in relation to the sale of securities" that, in a material respect and at the time and in the light of the circumstances under which it was made, was misleading or untrue and did thereby commit an offence contrary to section 122(1)(a) of the *Securities Act*.
15. On or about December 21, 2007, in the City of Toronto, in the Province of Ontario, Abel Da Silva made statements, to a person acting under the authority of the Ontario Securities Commission, during cross-examination on his affidavit dated December 18, 2007, to wit: since May 2006 he had not been involved in any business or undertaking which is in relation to the sale of securities, that, in a material respect and at the time and in the light of the circumstances under which they were made, were misleading or untrue and did thereby commit an offence contrary to section 122(1)(a) of the *Securities Act*.
16. On or about March 31, 2008, in the City of Toronto, in the Province of Ontario, Abraham Herbert Grossman, made a statement in an affidavit provided to the Ontario Securities Commission, to wit: "I was not involved in any way in customer service or had any connection what so ever to the sale of securities of Shallow Oil", that, in a material respect and at the time and in the light of the circumstances under which it was made, was misleading or untrue and did thereby commit an offence contrary to section 122(1)(a) of the *Securities Act*.

17. On or about March 31, 2008, in the City of Toronto, in the Province of Ontario, Abraham Herbert Grossman, made a statement while giving evidence before the Ontario Securities Commission, to wit: “I have had nothing to do with the sale of securities” of Shallow Oil & Gas Inc., that, in a material respect and at the time and in the light of the circumstances under which it was made, was misleading or untrue and did thereby commit an offence contrary to section 122(1)(a) of the *Securities Act*.
18. On or about March 31, 2008, in the City of Toronto, in the Province of Ontario, Abraham Herbert Grossman, made a statement through material provided to the Ontario Securities Commission, to wit: altered e-mail correspondence tendered as evidence, that, in a material respect and at the time and in the light of the circumstances under which it was made, was misleading or untrue and did thereby commit an offence contrary to section 122(1)(a) of the *Securities Act*.
19. On or about March 31, 2008, in the City of Toronto, in the Province of Ontario, Abraham Herbert Grossman, made a statement while giving evidence before the Ontario Securities Commission, to wit: he had never met Wayne Matthews and never had any communications with Wayne Matthews, that, in a material respect and at the time and in the light of the circumstances under which it was made, does not state a fact that is required to be stated or that is necessary to make the statement not misleading, and did thereby commit an offence contrary to section 122(1)(a) of the *Securities Act*.