

**ONTARIO SECURITIES COMMISSION**

**IN THE MATTER OF THE *SECURITIES ACT*  
R.S.O. 1990, c. S. 5, as amended**

**AND IN THE MATTER OF  
JOSEPH DEBUS**

**AND IN THE MATTER OF A DECISION OF THE  
INVESTMENT INDUSTRY REGULATORY ORGANIZATION OF CANADA**

FILE NO: 2019-16

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**MOTION OF**

**JOSEPH DEBUS**

**(Motion for stay of decision and penalty dated August 31<sup>st</sup>, 2021)**

**Returnable**

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The Applicant, Joseph Debus, makes a motion for a stay of decision and penalty dated August 31<sup>st</sup>, 2021 .

**A. ORDER SOUGHT**

The Moving Party, Joseph Debus, requests with notice, that the Ontario Securities Commission make the following order(s):

1. An Order staying the decision of Commissioner Cecilia Williams dated August 31<sup>st</sup>, 2021;
2. An Order staying the penalty pursuant to the decision of Commissioner Cecilia Williams dated August 31<sup>st</sup>, 2021; and
3. Such further and other relief as counsel may advise and the Panel may permit.

**B. GROUNDS**

The grounds for the motion are:

1. The Applicant, Joseph Debus, is appealing the decision of Commissioner Cecilia Williams dated August 31<sup>st</sup>, 2021.
2. The Applicant, Joseph Debus, is raising serious issues in regards to errors of law and procedural fairness in the decision of Commissioner Cecilia Williams dated August 31<sup>st</sup>, 2021.
3. The Applicant, Joseph Debus, will suffer sever prejudice and irreparable harm if he is not allowed to continue in his employment pending the outcome of the application for judicial review;
4. The continuing employment of the Applicant, Joseph Debus, is not against the public interest, as he is under continuing strict supervision; and
5. Such further and other grounds as counsel may advise and the Panel may permit.

### **C. EVIDENCE**

The Moving Party intends to rely on the following evidence for the motion:

1. Any documentary evidence filed in the original proceedings, subject to any limitation expressly imposed by any statute, regulation or rules;
2. Any other relevant documents in the original proceedings;
3. Any transcript of the oral evidence given at the original hearings;
4. The oral testimony of Joseph Debus;
5. Notice of Appeal dated September 29<sup>th</sup>, 2021; and
6. Any and all other evidence that may counsel may advise that may assist the Panel.

**DATED** this 29<sup>th</sup> day of September, 2021

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