

**THE ONTARIO SECURITIES COMMISSION**  
**(Applicant)**

- and -

**ROBERT GEORGE FREEMAN**  
**(Respondent)**

**File No. 2024-12**

**MOTION OF THE ONTARIO SECURITIES COMMISSION**

(For Extension of a Temporary Order Under Subsections 127(8) and 127(1)  
of the *Securities Act*, RSO 1990, c. S.5)

**A. ORDER SOUGHT**

The Ontario Securities Commission (the **Commission**) requests, with notice, that the Capital Markets Tribunal (the **Tribunal**) make the following orders:

1. An order extending the temporary order of the Commission dated July 29, 2024, made with respect to the respondent, Robert George Freeman (**Freeman**), until the conclusion of the enforcement proceeding in relation to the Commission's Application for Enforcement Proceeding filed on February 3, 2026, including the Tribunal's release of its decision on sanctions and costs, if any;
2. An order abridging the time required for service and filing of the Commission's motion and motion record, pursuant to Rules 3, 16(4), and 21(1) of the Capital Market Tribunal's *Rules of Procedure* (the **Rules**), if necessary;
3. An order that this motion be heard in writing pursuant to Rule 9(6); and
4. Such further orders as the Tribunal considers appropriate.

**B. GROUNDS**

The grounds for the motion are:

### **The Investigation**

4. An investigation was conducted in relation to the resales of shares in Qu Biologics Inc. (**QBI**) by Freeman;
5. On February 3, 2026, the Commission filed an Application for Enforcement Proceeding naming Freeman and his wholly owned corporation, Plover Mills Farms Inc. (**Plover**) as respondents. The allegations include:
  - a. Freeman and Plover engaged or participated in acts, practices or course of conduct relating to securities that they knew or reasonably ought to have known perpetrated a fraud on persons or companies, contrary to subsection 126.1(1)(b) of the Act;
  - b. Freeman engaged in distributions of securities without a preliminary prospectus or prospectus having been filed and without applicable exemptions from the prospectus requirement, contrary to subsection 53(1) of the Act;
  - c. Freeman engaged in, or held himself out as engaging in, the business of trading in securities without being registered and without an applicable exemption from the registration requirement, contrary to subsection 25(1) of the Act; and
  - d. Freeman engaged in conduct that was contrary to the public interest and harmful to the integrity of the Ontario capital markets.

### **The Temporary Order and Extensions**

6. On July 29, 2024, the Commission issued the Temporary Order, ordering that:

- a. all trading in the securities of QBI by Freeman, directly or indirectly, or by any person on behalf of Freeman shall cease, including but not limited to any act, advertisement, solicitation, conduct, or negotiation, directly or indirectly in furtherance of a trade;
  - b. any exemptions contained in Ontario securities law do not apply to Freeman; and
  - c. the Temporary Order shall take effect immediately and shall expire on the 15th day after its making unless extended by order of the Tribunal.
7. On August 8, 2024, a Panel of the Tribunal extended the Temporary Order until September 25, 2024;
8. On September 24, 2024, a Panel of the Tribunal extended the Temporary Order until February 13, 2025;
9. On February 11, 2025, a Panel of the Tribunal further extended the Temporary Order until February 27, 2025;
10. On February 21, 2025, a Panel of the Tribunal further extended the Temporary Order until August 13, 2025;
11. On August 12, 2025, a Panel of the Tribunal further extended the Temporary Order until August 29, 2025; and
12. On August 25, 2025, a Panel of the Tribunal further extended the Temporary Order until the earlier of: (i) 20 days after the issuance of an Application for Enforcement Proceeding naming Freeman as a respondent; or (ii) February 13, 2026;
13. The Temporary Order will expire on February 13, 2026;
14. The order sought by the Commission is necessary to protect investors from serious and ongoing harm and is in the public interest;

15. Subsections 127(1) and 127(8) of the Act;
16. Rules 3, 9(6), 16(4), 21(1) and
17. Such further grounds as counsel may advise and the Tribunal may permit.

### **C. EVIDENCE**

The Commission intends to rely on the following evidence for the motion:

16. The Commission's Application for Enforcement Proceeding filed on February 3, 2026;
17. The materials filed with the Tribunal previously in connection with this proceeding;
18. The Affidavit of Louisa Fiorini sworn on February 4, 2026; and
19. Such further and other materials as counsel may advise and the Tribunal may permit.

**Date:** February 4, 2026

**ONTARIO SECURITIES COMMISSION**

20 Queen Street West, 22<sup>nd</sup> Floor  
Toronto, ON M5H 3S8

**Sakina Babwani**

Litigation Counsel

Email: [sbabwani@osc.gov.on.ca](mailto:sbabwani@osc.gov.on.ca)

Tel: (416) 263-3763