

**PETER MICHAEL DEEB
(Applicant)**

AND

**CANADIAN INVESTMENT REGULATORY ORGANIZATION and ONTARIO
SECURITIES COMMISSION
(Respondents)**

FILE NO.:

NOTICE OF MOTION

[Motion to Stay Pending the Hearing of the Application under Section 8(4) of the *Securities Act*,
RSO 1990, c S.5]

A. ORDER SOUGHT

The applicant, Peter Michael Deeb (“**Mr. Deeb**”), requests with notice, that the Tribunal make the following order(s):

1. An order staying the Final Order and Decision on Sanctions and Costs of the CIRO Panel dated February 3, 2026, as it pertains to Mr. Deeb, until the disposition of the hearing and review commenced before this Tribunal (the “**Hearing and Review**”), or until further order of this Tribunal; and
2. Such further and other relief as is requested and which this Tribunal may permit.

B. GROUNDS

The grounds for the motion are:

1. Mr. Deeb has commenced a proceeding seeking a Hearing and Review of the Decision on Liability dated April 14, 2025 of the Canadian Investment Regulatory Organization (“**CIRO**”) Hearing Panel (Ontario District) (the “**CIRO Panel**”) (the “**Liability Decision**”), as it pertains to him, the Decision on Sanctions and Costs of the CIRO Panel

dated February 3, 2026 (the “**Sanctions Decision**”), as it pertains to him, and the Order dated February 3, 2026 (the “**Final Order**”), as it pertains to him.

2. In the Sanctions Decision, the CIRO Panel ordered, *inter alia*, that Mr. Deeb:
 - a. be suspended and prohibited from serving or being approved or registered as a Registered Representative with any Dealer Member or in any other capacity with a Dealer Member or Regulated Person for a period of one year;
 - b. be prohibited from serving or being approved or registered as an Executive or Supervisor of any Dealer Member or Regulated Person, or any corporation or entity of which a Dealer Member or Regulated Person is a subsidiary for a period of three years; and,
 - c. pay a fine of \$500,000, disgorgement of \$1,225,237 and costs of \$230,000.
3. The above orders in paragraph 2 are the orders for which a stay is sought. The CIRO Panel also made orders regarding Mr. Deeb’s ability to act as the UDP of Hampton Securities Limited (“**Hampton**”). That order is being contested in the Hearing and Review, however Hampton has appointed a new Interim CEO and UDP, such that a stay of that order is not necessary.
4. There are serious questions to be tried on the Hearing and Review. The CIRO Panel is alleged to have erred in numerous ways in making the Liability Decision, and a finding that any one of those errors that was committed would require the Liability Decision to be set aside and determined *de novo* by this Tribunal, which also requires the Sanctions Decision to be set aside. Further, there are additional serious errors alleged in the Sanctions Decision as well.

5. Mr. Deeb would suffer irreparable harm if the requested stay is not granted. He would be prohibited from being registered in any capacity, thus being unable to work as a Registered Representative. If he is successful in setting aside the Liability and Sanctions Decisions, it is not possible to undo what would have been an unjustified and improper suspension.
6. The CIRO Panel also purported to restrict Mr. Deeb from serving or being approved or registered as an Executive, Supervisor, or UDP of the parent company of Hampton. The CIRO Panel had no jurisdiction to make such an order. Without a stay, the Sanctions Order would illegally place restrictions on Mr. Deeb, thus causing irreparable harm.
7. The balance of convenience favours Mr. Deeb. A new Interim CEO and UDP of Hampton has been appointed. Mr. Deeb is not seeking to act as the UDP, or in a supervisory role with Hampton during the period of the stay. The events at issue in this proceeding took place in 2020. Mr. Deeb remained the CEO and UDP of Hampton since then. Recent CIRO regulatory reviews have confirmed that Hampton has a robust compliance system and none of the past issues are present. There is no harm to the public interest if a stay of the Sanctions Decision is granted pending a determination on the Hearing and Review.
8. Section 8(4) of the *Securities Act*, RSO 1990, c S.5.
9. Sections 16.1 and 25.0.1 of the *Statutory Powers Procedure Act*, RSO 1990, c S.22;
10. Such further and other grounds as counsel may advise and this Tribunal may permit.

C. EVIDENCE:

1. Affidavits, to be sworn;
2. Such further evidence as counsel may advise and this Tribunal may permit.

February 26, 2026

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