

**PETER MICHAEL DEEB**  
(Applicant)

**AND**

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

**FILE NO.: 2026-10**

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**NOTICE OF MOTION**

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**A. ORDER SOUGHT**

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

1. An Order continuing the existing Stay Order of the Tribunal until such time as a motion can be determined by the Divisional Court for a request for an order granting an interim stay of the Final Order and Decisions on Sanctions and Costs of the CIRO Panel dated February 3, 2026, as it pertains to Mr. Deeb, until the disposition of the Application for Judicial Review before the Divisional Court, 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. On February 26, 2026, Mr. Deeb brought a motion seeking a stay of the Sanctions Decision and Final Order as they pertain to him, pending the disposition of the Hearing and Review. On April 6, 2026, the Tribunal issued an Order dismissing Mr. Deeb’s motion for a stay and granting an interim stay for 10 business days.
3. On April 15, 2026, Mr. Deeb filed a Notice of Application for Judicial Review of the Tribunal’s decision on the stay motion in the Divisional Court.
4. On April 16, 2026, Mr. Deeb requested that the Tribunal extend the interim stay Order for an additional 15 business days to allow the parties time to appear before the Divisional Court to deal with a request for a further interim stay and the scheduling of the Application, without objection from any party.
5. On April 20, 2026, the Tribunal issued an Order extending the interim stay until May 11, 2026.
6. On April 20, 2026, counsel for Mr. Deeb emailed counsel for the other parties with a draft of an email the parties were to agree to, to be sent to the Divisional Court. Substantive responses were not received from the OSC or CIRO until April 29, 2026. On April 30, 2026, the email was sent to the Divisional Court wherein a case conference before the Divisional Court was requested to confirm an agreed upon timetable and to schedule a motion for an interim stay. A case conference has not yet been scheduled by the Divisional Court.
7. On May 7, 2026, the Ontario Securities Commission raised a jurisdictional objection as to the Divisional Courts ability to grant an interim order for the first time. The OSC stated

that “[t]he Divisional Court cannot grant an interim stay by simple consent of the parties when it is contrary to the Securities Act’s legislative scheme”.

8. Mr. Deeb is unable to schedule a motion and have this jurisdictional objection determined by the Divisional Court prior to the end of May 11, 2026. If the Stay Order is not extended until the Divisional Court can schedule and determine an interim motion, the suspension of Mr. Deeb’s registration would take effect prior to the Divisional Court making its determination as to whether the suspension should take effect. The previous extension of the Stay Order until May 11 was explicitly to allow the parties to get before the Divisional Court and have the Divisional Court make determinations. No jurisdictional objections as to the Divisional Court’s ability to grant an interim order were raised by any party at that time.
9. Section 8(4) of the *Securities Act*, RSO 1990, c S.5.
10. Sections 16.1 and 25.0.1 of the *Statutory Powers Procedure Act*, RSO 1990, c S.22;
11. Such further and other grounds as counsel may advise and this Tribunal may permit.

### **C. EVIDENCE**

1. Affidavit of Sabrina Heaman, sworn May 8, 2026
2. Such further evidence as counsel may advise and this Tribunal may permit.

May 8, 2026

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