

MOTION

**IN THE MATTER OF
JOSEPH DEBUS**

FILE NO: 2019-16

**MOTION
OF JOSEPH DEBUS**

For a stay of the original decision until the hearing and review
Under s.8(4) of the *Securities Act*, RSO 1990, c. S.5 and/or Rule 14(3)

A. ORDER SOUGHT

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

1. An Order under s. 8(4) of the *Securities Act* granting a stay of the original decision until the hearing and review is concluded.

B. GROUNDS

The grounds for the motion are:

1. The Moving Party does not present a threat to investors in the community;
2. The Moving Party is under supervision and has been for the past several years and has had no incidents of concern;
3. The Moving Party will suffer grave harm and prejudice if he's unable to provide financially for his young family that includes three children in school; and
4. There is *prima facie* merit to the grounds for this appeal including ineffective representation by a paralegal representative.

C. EVIDENCE

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

1. The decision that is the subject of the request for a hearing and review and the related reasons;

2. The application or other documents by which the original proceeding was commenced;
3. Any interim orders made in the original proceedings;
4. Any documentary evidence filed in the original proceedings, subject to any limitation expressly imposed by any statute, regulation or rules;
5. Any other relevant documents in the original proceedings;
6. Any transcript of the oral evidence given at the original hearings; and
7. Other evidence that may assist the Commission.

DATED this 26th day of June, 2019

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