Ontario Securities Commission Commission des valeurs mobilières de l'Ontario

P.O. Box 55, 19th Floor 20 Queen Street West Toronto ON M5H 3S8

CP 55, 19e étage 20, rue queen ouest Toronto ON M5H 3S8

IN THE MATTER OF THE SECURITIES ACT

R.S.O. 1990, c. S.5, AS AMENDED (the "Act")

- and -

IN THE MATTER OF

CERTAIN DIRECTORS, OFFICERS AND OTHER INSIDERS OF RESEARCH IN MOTION LIMITED

(BEING THE PERSONS AND COMPANIES LISTED IN SCHEDULE "A" HERETO)

STATEMENT OF ALLEGATIONS OF STAFF OF THE ONTARIO SECURITIES COMMISSION

Staff of the Ontario Securities Commission make the following allegations:

- 1. Research in Motion Limited ("RIM") is incorporated under the *Business Corporations Act* (Ontario) and is a reporting issuer in the Province of Ontario.
- 2. Each of the persons and companies listed in Schedule "A" (individually, a "Respondent" and collectively, the "Respondents") is, or was, at some time since the end of the period covered by the last financial statements filed by RIM, namely June 3, 2006, a director, officer or other insider of RIM and during that time had, or may have had, in the ordinary course access to or received material information with respect to RIM that has not been generally disclosed.
- 3. On October 13, 2006, RIM issued and subsequently filed on SEDAR a press release disclosing that it would delay the release of its interim financial statements for the 3 months ended September 2, 2006 and management's discussion and analysis relating to those interim financial statements (collectively, the "Second Quarter Disclosure Documents").

- 4. RIM did not file the Second Quarter Disclosure Documents by the prescribed deadline under Ontario securities law, namely October 17, 2006.
- 5. RIM has not filed the Second Quarter Disclosure Documents as of the date hereof.
- 6. RIM is in default of the requirements of Ontario securities law for the reason that RIM has not filed the Second Quarter Disclosure Documents within the time period required by Ontario securities law.
- 7. It would be prejudicial to the public interest to allow the Respondents to trade in the securities of RIM until such time as all disclosure required by Ontario securities law has been made by RIM.
- 8. It is therefore in the public interest that an order be issued that all trading in and all acquisitions of securities of RIM, whether direct or indirect, by any of the Respondents shall cease until two full business days following the receipt by the Commission of all filings RIM is required to make pursuant to Ontario securities law.

October 24, 2006

Schedule "A"

Asthana, Atul

Balsillie, James Laurence

Bawa, Frenny

Bawa, Karima

Bidulka, Brian

Bose, Robert

Boudreau, Jesse Joseph

Broughall, Peter

Brown, Wade

Caci, Joe

Castell, William David

Conlee, Larry

Cork, Edwin Kendall

Cort, Gary

Costanzo, Rito Natale

Crow, Robert Eric

Davies, William Aubrey

Devenyi, Peter John

Dikun, Raymond Michael

Donald, Paul David

Ebbs, Edel Bridget Anne

Efstathiou Jr., Chris

Eggberry, Charmaine

Estill, James

Fregin, Douglas Edgar

Gagne, Alain

Gould, Peter James

Guibert, Mark

Hind, Hugh Robert Faulkner

Hoddle, Ian James

Jarmuszewski, Perry

Kavelman, Dennis

Kempf, Paul Hans

Labrador, Christopher

Landry, Richard

Lazaridis, Michael

LeBlanc, Anthony Dale

Lewis, Allan

Lo, Norm Wai Keung

Loberto, Angelo

Maybee, Bradley Warren

McAndrews, Mike Patrick

McDowell, Jeffrey Wayne

McLennan, Craig Arthur

Miller, Deborah Glee

Morrison, Donald

Morrissey, Michael Paul

Neumann, Ronald Scott

Pacey, Dean Leslie

Panezic, Alan Tom

Payne, Susan

Pecen, Mark Edward

Periyalwar, Suresh

Pillar, Catherine Jean

Richardson, John

Rivers, Brian Thomas

Robinson, Clint

Roe Pfeifer, Mary Elizabeth Anne

Rooks, Michael

Sanchez, Tom Carl

Spence, Patrick Alexander

Tendler, Benson

Werezak, David

Witteveen, Roger

Wright, Dr. Douglas

Yach, David

1258700 Ontario Limited

1258701 Ontario Limited

1258702 Ontario Limited