

VIA COURIER

**IN THE MATTER OF the Motor Vehicle Dealers Act, 2002, S.O. 2002, Chapter 30, Schedule B
and Regulations, as amended**

- and -

**IN THE MATTER OF the registration of
MUHAMMAD ABDUL REHMAN NAEEM O/A NAEEM SPORTS**

**TO: MUHAMMAD ABDUL REHMAN NAEEM
O/A NAEEM SPORTS
446 King George Road
Brantford, ON, N3T 5L8**

NOTICE OF PROPOSAL TO REVOKE REGISTRATION

Take notice that pursuant to Section 9 of the *Motor Vehicle Dealers Act, 2002* (the "Act") the Registrar is proposing to revoke the registration of **MUHAMMAD ABDUL REHMAN NAEEM O/A NAEEM SPORTS** as a motor vehicle dealer under the Act.

REASONS

The intention and objective of the Act is to protect the public interest. In doing so, the Act prohibits the making of false statements in an application for registration or renewal and requires that Registrants be financially responsible in the conduct of business and that they carry on business in accordance with the law and with integrity and honesty. The past conduct of **MUHAMMAD ABDUL REHMAN NAEEM O/A NAEEM SPORTS**, as well as a breach of a condition of the registration are inconsistent with the intention and objective of the Act, and therefore warrant disentitlement to registration under the Act.

PARTICULARS

The reasons for this proposal are:

Background

1. Muhammad Abdul Rehman Naeem o/a Naeem Sports (the "Dealer") is a sole proprietor who is registered as a motor vehicle dealer under the Act. The Dealer was registered on or about November 28, 2025.
2. Muhammad Abdul Rehman Naeem ("Naeem") is the owner, operator, and person in charge of the day-to-day activities of the Dealer.

3. Naeem is a partner at Naeem Studios, a general partnership that has not been registered under the Act. Naeem and Naeem Studios are associated and interested persons with respect to each other pursuant to section 6(4) of the Act.

PAST CONDUCT

2025 Proposal

5. On or about July 16, 2025, the Registrar issued a Notice of Proposal to Refuse an application for registration of the Dealer (the "2025 Proposal").
6. The 2025 Proposal is attached hereto as Schedule "A".
7. The 2025 Proposal, among other things, alleged that on June 9, 2025:
 - a. the Dealer was convicted of one (1) count of trading in a motor vehicle without having been registered to do so, contrary to section 4(1) (a) of the Act;
 - b. Naeem was convicted of one (1) count of trading in a motor vehicle without having been registered to do so, contrary to section 4(1) (a) of the Act;
 - c. Naeem Studios Inc. was convicted of two (2) counts of trading in a motor vehicle without having been registered to do so, contrary to section 4(1) (a) of the Act.
8. On October 3, 2025, the 2025 Proposal was resolved by way of a License Appeal Tribunal (LAT) consent order, whereby the Dealer's registration was subject to terms and conditions.
9. In accordance with the terms and conditions of registration, the Dealer agreed to the following:
 5. Within ninety (90) days of registration, Naeem Sports will provide an irrevocable Letter of Credit ("LOC") in the amount of \$25,000 [to the benefit] of the Motor Vehicle Dealers Compensation Fund from a financial institution under the Loan and Trust Corporations Act.
10. The Dealer was required to provide the above-noted LOC by February 26, 2026.

Breach of a Condition of the Registration

11. On or about January 20, 2026, a representative of the Registrar (the "Representative") emailed the Dealer, with a reminder to abide by the deadline of February 26, 2026. In response, the Dealer requested an extension to March 31, 2026, to arrange sufficient funds.
12. On or about January 21, 2026, the Representative informed the Dealer to comply with the deadline set out in the LAT consent order.
13. On or about January 27 and February 12, 2026, the Representative sent further reminders to the Dealer regarding the Dealer's obligation to provide the required LOC.
14. On or about February 18, 2026, counsel for the Dealer, requested an extension of time to April 12, 2026, to provide the required LOC.

15. In response, on or about February 19, 2026, the Representative reiterated to comply with the terms and conditions of the LAT consent order.
16. On or about February 27, 2026, a past due notification was sent to the Dealer.
17. Counsel for the Dealer expressed the Dealer's intention to submit a LOC and requested a short grace period before taking further administrative action. In response, the Representative advised that the information would be forwarded to management.
18. On or about March 25, 2026, the Representative followed up with the Dealer to advise that the deadline had passed and requested clarification on why the ninety (90) day period provided for compliance with the LAT consent order was insufficient.
19. On or about March 25, 2026, counsel for the Dealer advised that the funds had been deposited with the bank and that the LOC process was underway.
20. On or about April 10, 2026, counsel for the Dealer further advised that the bank was reviewing the request for a LOC.
21. On or about April 20, 2026, the Representative requested an update to be reviewed by management. In response, counsel for the Dealer advised that the Dealer had followed up with the bank, albeit the LOC condition remained outstanding.
22. Despite repeated reminders, extensions requested by or on behalf of the Dealer, and multiple opportunities to comply, the Dealer has failed to provide the required LOC.
23. The Dealer thereby breached the terms and conditions of registration entered pursuant to a LAT consent order.

Outstanding Fine for Prosecution

24. On or about June 9, 2025, the Dealer pleaded guilty to one (1) count of acting as a motor vehicle dealer in connection with the trade of a 2021 Kawasaki EX400, while not registered to do so, contrary to section 4(1)(a) of the Act. As a result of the conviction particularized in paragraph 7 a., the Dealer was ordered to pay a fine totalling \$5,000 within one (1) year, which remains in default to date.
25. Naeem pleaded guilty to one (1) count of acting as a motor vehicle dealer in connection with the trade of a 2015 Chevrolet Silverado, while not registered to so, contrary to section 4(1)(a) of the Act. As a result of the conviction particularized in paragraph 7 b., Naeem was ordered to pay a fine totalling \$5,000 within one (1) year and an order of restitution payable to AB by December 9, 2025. These remain in default to date.
26. Naeem Studios Inc. pleaded guilty to two (2) counts of acting as a motor vehicle dealer in connection with the trade of a 2009 Toyota Corolla and 2022 Honda HR-V, while not registered to so, contrary to section 4(1)(a) of the Act. As a result of the conviction particularized in paragraph 7 c., Naeem Studios Inc. was ordered to pay a fine of \$2,500 each, within one (1) year, which remains in default to date.

GENERALLY

27. The past conduct of the Dealer affords reasonable grounds for the belief that it will not carry on business in accordance with the law and with integrity and honesty and therefore, the Dealer is disentitled to registration pursuant to section 6(1)(a)(ii).
28. The Dealer's breach of conditions on its registration constitutes a breach of section 6(1)(f) under the Act and further justifies the Dealer's disentanglement to registration.

RIGHT TO A HEARING

Section 9(2) of the Act provides that an Applicant/Registrant is entitled to a hearing by the Licence Appeal Tribunal in respect of this proposal, if **WITHIN 15 DAYS** after service of this proposal, the Applicant/Registrant mails or delivers a written request for a hearing, to the following parties:

Licence Appeal Tribunal
Tribunals Ontario
General Services
15 Grosvenor Street, Ground Floor
Toronto, ON M7A 2G6
Email: LATRegistrar@ontario.ca

Ontario Motor Vehicle Industry Council (OMVIC)
Registrar, *Motor Vehicle Dealers Act, 2002*
65 Overlea Blvd., Suite 300
Toronto, ON M4H 1P1

- AND TO - Email: Legal_Dept@omvic.on.ca

Note that Section 9(4) of the Act provides that where the Applicant/Registrant does not require a hearing by the Tribunal in accordance with subsection 9(2), the Registrar may carry out the proposal to refuse/revoke/suspend the registration, without further notice to you.

Section 9(5) of the Act provides that where an Applicant/Registrant requires a hearing, the Tribunal shall schedule a hearing. At that time, the Tribunal may order the Registrar to carry out, or refrain from carrying out this proposal, or may order that the Registrar take such action as the Tribunal considers appropriate, in accordance with the Act and the regulations.

Section 9 (5) of the Act provides that the Tribunal may attach such terms and conditions to its Order or to the registration, as it considers proper to give effect to the purposes of the Act.

APPLICATION OF THE STATUTORY POWERS PROCEDURE ACT

The *Statutory Powers Procedure Act*, R.S.O. 1990, Chapter S.22, as amended, applies to the hearing to be held by this Tribunal. A party to a proceeding may be represented by counsel or an agent.

The Registrar states that the good character, propriety of conduct or competence of the Applicant/Registrant shall be an issue in any hearing before the Tribunal and the Registrar has, therefore, furnished herein reasonable information of allegations with respect thereto.

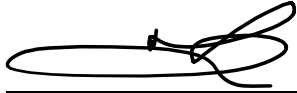
APPLICATION OF THE COMMON RULES OF PRACTICE AND PROCEDURE FOR THE LICENCE APPEAL TRIBUNAL, ANIMAL CARE REVIEW BOARD, and FIRE SAFETY COMMISSION

This is to serve as notice that the Registrar shall make application for its costs pursuant to Rule 19 of the Common Rules of Practice.

FURTHER PARTICULARS/SUPPLEMENTAL NOTICE

The Registrar may provide further and other particulars in respect of any other matters herein or in respect to any other matter including further grounds for refusal/revocation/suspension of registration.

DATED at Toronto, this 12th day of August 2026.

A handwritten signature in black ink, consisting of a large loop followed by a smaller loop and a trailing line.

Thaya Gengatharan

Deputy Registrar, Acting Registrar pursuant to s. 3(3) of the *Motor Vehicle Dealers Act, 2002*"

SCHEDULE "A"

VIA COURIER & EMAIL

**IN THE MATTER OF the Motor Vehicle Dealers Act, 2002, S.O. 2002, Chapter 30.
Schedule B and Regulations, as amended**

- and -

**IN THE MATTER OF the registration of MUHAMMAD ABDUL REHMAN NAEEM o/a
NAEEM SPORTS**

TO: Muhammed Abdul Rehman Naeem
o/a Naeem Sports
187 Marlborough Street
Brantford, ON N3S 4S8

NOTICE OF PROPOSAL TO REFUSE REGISTRATION

Take notice that pursuant to Section 9 of the *Motor Vehicle Dealers Act, 2002* (the "Act") the Registrar is proposing to refuse the registration of Muhammad Abdul Rehman Naeem o/a Naeem Sports as a motor vehicle dealer under the Act.

REASONS

The intention and objective of the Act is to protect the public interest. In doing so, the Act prohibits the making of false statements in an application for registration or renewal and requires that Registrants be financially responsible in the conduct of business and that they carry on business in accordance with the law and with integrity and honesty.

The past conduct of Muhammad Abdul Rehman Naeem o/a Naeem Sports is inconsistent with the intention and objective of the Act and therefore warrants the disentitlement of Muhammad Abdul Rehman Naeem o/a Naeem Sports to registration under the Act.

PARTICULARS:

The reasons for this proposal are:

BACKGROUND:

1. On or about March 27, 2024, Muhammad Abdul Rehman Naeem o/a Naeem Sports ("Naeem Sports") submitted an application as a sole proprietorship to be registered as a motor vehicle dealer under the Act.
2. Naeem Sports and its owner and operator, Muhammad Abdul Rehman Naeem ("Muhammad Naeem") have never been registered under the Act.

PAST CONDUCT:

Warning Letter

3. In or around April 2023, Ontario Motor Vehicle Industry Council ("OMVIC") received a complaint that Muhammad Naeem had been operating as an unregistered dealer by selling motorcycles to consumers.
4. On or about October 4, 2023, following an investigation conducted by a representative of the Registrar, a Warning Letter in lieu of charges was issued to Muhammad Naeem cautioning him that he was not registered to trade in motor vehicles under the Act and that further contraventions of the Act would result in prosecution.
5. Muhammad Naeem accepted and signed the Warning Letter as a formal caution in lieu of charges.

2021 Kawasaki EX400, VIN: *AB6748**

6. On or about March 14, 2024, Consumer A attended 1160 Strathy Avenue in Mississauga and purchased a 2021 Kawasaki EX400 motorcycle (VIN: ***AB6748).
7. Consumer A met and negotiated the purchase price of the vehicle with Muhammad Naeem.
8. The bill of sale provided to Consumer A lists "Muhammad Naeem, Owner Naeem Sports" as the seller of the motorcycle.
9. On or about June 9, 2025, Naeem Sports pled guilty to the offence of acting as an unregistered motor vehicle dealer, contrary to section 4(1)(a) of the Act. Naeem Sports was fined \$5,000.

2015 Chevrolet Silverado, VIN: *524732**

10. On or about November 25, 2024, Consumer B attended 1160 Strathy Avenue in Mississauga and purchased a 2015 Chevrolet Silverado (VIN: ***524372).
11. The bill of sale provided to Consumer B lists "Naeem Studios Inc. (Director Muhammad Naeem)" as the seller of the vehicle.
12. Naeem Studios Inc.'s sole director is Muhammad Tahla Naeem ("Tahla").
13. Naeem Studios Inc. is not registered under the Act.
14. Consumer B confirmed that they met and negotiated the purchase price with Muhammad Naeem and not Tahla.

15. After purchasing the vehicle, Consumer B advised that MTO deemed the vehicle as being unsafe, removed the plates and changed the vehicle status to unfit.
16. On or about December 12, 2024, Consumer B submitted a complaint to OMVIC.
17. On or about June 9, 2025, Muhammad pled guilty to the offence of acting as an unregistered motor vehicle dealer, contrary to section 4(1)(a) of the Act. Muhammad was fined \$5,000.

2009 Toyota Corolla, VIN: *025955**

18. On or about February 23, 2024, Consumer C observed a 2009 Toyota Corolla (VIN: ***025955) being advertised for sale through social media by Muhammad Naeem.
19. On or about February 24, 2024, Consumer C met with Muhammad Naeem and purchased the vehicle.
20. MTO records indicate the vehicle was registered to Naeem Studios Inc. prior to registration being transferred to Consumer C.
21. On or about June 9, 2025, Naeem Studios Inc. pled guilty to the offence of acting as an unregistered motor vehicle dealer, contrary to section 4(1)(a) of the Act. Naeem Studios Inc. was fined \$2,500.
22. Muhammad Naeem acted as a motor vehicle dealer when not registered to do so, contrary to section 4(1)(a) of the Act.

2022 Honda HR-V, VIN: 105280

23. In or around January 2024, Consumer D observed a 2022 Honda HR-V (VIN: ***105280) being advertised for sale through social media by Muhammad Naeem.
24. On or about January 13, 2024, Consumer D contacted Muhammad Naeem and was told to attend 1160 Strathy Avenue in Mississauga to view the vehicle.
25. On or about January 15, 2024, Consumer D attended the address provided, met with Muhammad Naeem and purchased the vehicle.
26. Muhammad Naeem identified himself as the director of Naeem Studios Inc. to Consumer D.
27. MTO records indicated the vehicle was registered to Naeem Studios Inc. prior to registration being transferred to Consumer D.
28. On or about June 9, 2025, Naeem Studios Inc. pled guilty to the offence of acting as an unregistered motor vehicle dealer, contrary to section 4(1)(a) of the Act. Naeem Studios Inc. was fined \$2,500.

29. Muhammad Naeem acted as a motor vehicle dealer when not registered to do so, contrary to section 4(1)(a) of the Act.

Grounds for Revocation:

30. Naeem Sports' past conduct disentitles Naeem Sports to registration pursuant to s.6(1)(a)(ii) of the Act.

RIGHT TO A HEARING

Section 9(2) of the Act provides that an Applicant/Registrant is entitled to a hearing by the Licence Appeal Tribunal in respect of this proposal, if **WITHIN 15 DAYS** after service of this proposal, the Appellant/Registrant mails or delivers a written request for a hearing, to the following parties:

Licence Appeal Tribunal
Tribunals Ontario
General Services
15 Grosvenor Street, Ground Floor
Toronto, ON M7A 2G6

Ontario Motor Vehicle Industry Council (OMVIC)
Registrar, *Motor Vehicle Dealers Act, 2002*
65 Overlea Blvd., Suite 300
Toronto, ON M4H 1P1

Email: LATRegistrar@ontario.ca - AND TO - Email: Legal_Dept@omvic.on.ca

Note that Section 9(4) of the Act provides that where the Appellant/Registrant does not require a hearing by the Tribunal in accordance with subsection 9(2), the Registrar may carry out the proposal to refuse/revoke/suspend the registration, without further notice to you.

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The Registrar states that the good character, propriety of conduct or competence of the Appellant/Registrant shall be an issue in any hearing before the Tribunal and the Registrar has, therefore, furnished herein reasonable information of allegations with respect thereto.

**APPLICATION OF THE COMMON RULES OF PRACTICE AND PROCEDURE FOR
THE LICENCE APPEAL TRIBUNAL, ANIMAL CARE REVIEW BOARD, and FIRE
SAFETY COMMISSION**

This is to serve as notice that the Registrar shall make application for its costs pursuant to Rule 19 of the Common Rules of Practice.

FURTHER PARTICULARS/SUPPLEMENTAL NOTICE

The Registrar may provide further and other particulars in respect of any other matters herein or in respect to any other matter including further grounds for refusal/revocation/suspension of registration.

DATED at Toronto, this 16 day of July 2025.


Maureen Harquail
Registrar, *Motor Vehicle Dealers Act, 2002*