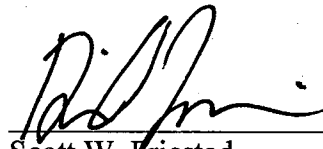


RELIEF REQUESTED

WHEREFORE, the Commission respectfully requests that this Court enter judgments:

- (a) permanently enjoining Defendants Samson, Munro, Campbell, and Whelan from violating Exchange Act Sections 30A and 13(b)(5) [15 U.S.C. §§ 78dd-1 and 78m(b)(5)], and Exchange Act Rule 13b2-1 [17 C.F.R. § 240.13b2-1], and from aiding and abetting violations of Exchange Act Sections 13(b)(2)(A) and 13(b)(2)(B) [15 U.S.C. §§ 78m(b)(2)(A) and 78m(b)(2)(B)];
- (b) ordering Defendant Samson to disgorge, with prejudgment interest, ill-gotten gains he received in connection with the bribery scheme;
- (c) ordering Defendants Samson, Munro, Campbell, and Whelan to pay civil penalties pursuant to Exchange Act Sections 21(d)(3) and 32(c) [15 U.S.C. §§ 78u(d)(3) and 78ff(c)]; and
- (d) granting such other and further relief as is just and appropriate.

Respectfully submitted,



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