

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

In the Matter of : INITIAL DECISION MAKING FINDINGS AND
: IMPOSING SANCTION BY DEFAULT
JENNY E. COPLAN : May 1, 2014

APPEARANCE: Amie Riggle Berlin for the Division of Enforcement,
Securities and Exchange Commission

BEFORE: Carol Fox Foelak, Administrative Law Judge

SUMMARY

This Initial Decision bars Jenny E. Coplan (Coplan) from the securities industry.

I. BACKGROUND

The Securities and Exchange Commission (Commission) instituted this proceeding with an Order Instituting Proceedings (OIP) on March 18, 2014, pursuant to Section 15(b) of the Securities Exchange Act of 1934 (Exchange Act). The OIP alleges that Coplan was enjoined against violations of the antifraud and registration provisions of the federal securities laws. She was served with the OIP in accordance with 17 C.F.R. § 201.141(a)(2)(i) on April 10, 2014, and her Answer to the OIP was due within twenty days of service of the OIP on her. See OIP at 2; 17 C.F.R. § 201.220(b). She has not filed an Answer to date. Accordingly, she has failed to answer or otherwise to defend the proceeding within the meaning of 17 C.F.R. § 201.155(a)(2). Therefore, Coplan is in default, and the undersigned finds that the allegations in the OIP are true.¹ See OIP at 2-3; 17 C.F.R. §§ 201.155(a), .220(f).

II. FINDINGS OF FACT

Coplan is permanently enjoined from violating these antifraud and registration provisions: Sections 5(a), 5(c), and 17(a) of the Securities Act of 1933 and Sections 10(b) and

¹ Coplan was previously advised that if she failed to file an Answer within the time provided, she would be deemed to be in default, and the undersigned would enter an order barring her from the securities industry. See Jenny E. Coplan, Admin. Proc. Rulings Release No. 1362, 2014 SEC LEXIS 1217 (A.L.J. Apr. 7, 2014).

15(a)(1) of the Exchange Act and Rule 10b-5 thereunder. SEC v. Coplan, No. 13-cv-62127 (S.D. Fla. Feb. 24, 2014).² Additionally, she was ordered to pay disgorgement of \$878,000 plus prejudgment interest of \$58,756.97 and a civil penalty in an amount to be determined. Id.

Coplan, age 54, of Tamarac, Florida, was the president and managing member of Immigration General Services, LLC (Immigration Services), from at least January 2009 until at least October 2011. Neither she nor her company was registered with the Commission in any capacity. In the conduct underlying her injunction, Coplan acted as an unregistered broker-dealer by regularly participating at key points in the distribution of Immigration Services securities, soliciting prospective investors in person and on the telephone, recommending to prospective investors that they purchase Immigration Services' promissory notes and investment contracts, discussing the returns and safety of the investment, and receiving transaction-based compensation. In doing so, Coplan operated an affinity fraud and Ponzi scheme, misappropriated investor funds, made false representations to investors about the safety of the investment and use of investor funds, and otherwise engaged in a variety of conduct that operated as a fraud and deceit on investors. Additionally, she sold unregistered securities and acted as an unregistered broker-dealer.

III. CONCLUSIONS OF LAW

Coplan has been permanently enjoined "from engaging in or continuing any conduct or practice in connection with any such activity" as a broker or dealer within the meaning of Sections 15(b)(4)(C) and 15(b)(6)(A)(iii) of the Exchange Act.

IV. SANCTION

Coplan will be barred from the securities industry.³ This sanction will serve the public interest and the protection of investors, pursuant to Section 15(b) of the Exchange Act, and accord with Commission precedent and the sanction considerations set forth in Steadman v. SEC, 603 F.2d 1126, 1140 (5th Cir. 1979). As described in the Findings of Fact, Coplan's unlawful conduct was recurring and egregious and involved a high degree of scienter; extending over a period of almost three years, Coplan's scheme resulted in the misappropriation of hundreds of thousands of dollars. There is a reasonable foreseeable risk that, if she were allowed to resume her former business activities, she would engage in similar criminal conduct. Because of the Commission's obligation to ensure honest securities markets, an industry-wide bar is appropriate.

² Official notice pursuant to 17 C.F.R. § 201.323 is taken of the docket report and the court's orders in SEC v. Coplan.

³ The fact that Coplan was not associated with a registered broker-dealer during her wrongdoing does not insulate her from a bar. See Vladislav Steven Zubkis, Exchange Act Release No. 52876 (Dec. 2, 2005), 86 SEC Docket 2618, 2627 (barring unregistered associated person of an unregistered broker-dealer from association with a broker or dealer), recon. denied, Exchange Act Release No. 53651 (Apr. 13, 2006), 87 SEC Docket 2584.

V. ORDER

IT IS ORDERED that, pursuant to Section 15(b) of the Securities Exchange Act of 1934, 15 U.S.C. § 78o(b), JENNY E. COPLAN IS BARRED from associating with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization and from participating in an offering of penny stock.⁴

This Initial Decision shall become effective in accordance with and subject to the provisions of Rule 360 of the Commission's Rules of Practice, 17 C.F.R. § 201.360. Pursuant to that Rule, a party may file a petition for review of this Initial Decision within twenty-one days after service of the Initial Decision. A party may also file a motion to correct a manifest error of fact within ten days of the Initial Decision, pursuant to Rule 111 of the Commission's Rules of Practice, 17 C.F.R. § 201.111. If a motion to correct a manifest error of fact is filed by a party, then that party shall have twenty-one days to file a petition for review from the date of the undersigned's order resolving such motion to correct a manifest error of fact. The Initial Decision will not become final until the Commission enters an order of finality. The Commission will enter an order of finality unless a party files a petition for review or a motion to correct a manifest error of fact or the Commission determines on its own initiative to review the Initial Decision. If any of these events occur, the Initial Decision shall not become final.⁵

Carol Fox Foelak
Administrative Law Judge

⁴ Thus, she will be barred from acting as a promoter, finder, consultant, or agent; or otherwise engaging in activities with a broker, dealer, or issuer for purposes of the issuance or trading in any penny stock, or inducing or attempting to induce the purchase or sale of any penny stock, pursuant to Exchange Act Section 15(b)(6)(A), (C).

⁵ A respondent may also file a motion to set aside a default pursuant to 17 C.F.R. § 201.155(b). See Alchemy Ventures, Inc., Exchange Act Release No. 70708, 2013 SEC Lexis 3459, at *5-6 (Oct. 17, 2013).