

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

ADMINISTRATIVE PROCEEDINGS RULINGS

Release No. 5513/January 23, 2018

ADMINISTRATIVE PROCEEDING

File No. 3-17621

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In the Matter of

ANDREW STITT

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ORDER

The Securities and Exchange Commission instituted this proceeding on with an Order Instituting Proceedings (OIP) October 6, 2016, pursuant to Section 15(b) of the Securities Exchange Act of 1934. The proceeding is a follow-on proceeding based on *SEC v. Team Resources, Inc.*, No. 3:15-cv-1045 (N.D. Tex. Aug. 18, 2016), in which Respondent Andrew Stitt was enjoined against violations of the antifraud and registration provisions of the federal securities laws.

The undersigned has completed the reexamination of the record as ordered by the Commission's November 30, 2017, order concerning administrative proceedings. *Pending Admin. Proc.*, Securities Act of 1933 Release No. 10440, 2017 SEC LEXIS 3724 (Remand Order). As the parties were previously notified, the Remand Order ratified the appointment of the undersigned as an Administrative Law Judge and directed her to “[r]econsider the record, including all substantive and procedural actions taken by an administrative law judge” and “[d]etermine . . . whether to ratify or revise . . . all prior actions” in proceedings, such as this one. *Id.* at \*3; *see Andrew Stitt*, Admin. Proc. Rulings Release No. 5318, 2017 SEC LEXIS 3960 (A.L.J. Dec. 7, 2017). As required by the Remand Order, the parties were invited “to submit any new evidence [they deem] relevant to the [undersigned’s] reexamination of the record” by the date when Respondent Stitt’s Answer to the OIP was due.<sup>1</sup> *Id.* No party submitted such new evidence.<sup>2</sup> The undersigned has reconsidered the record and determined to ratify “all prior actions” that she took prior to November 30, 2017.<sup>3</sup> The process required by the Remand Order has been completed.

IT IS SO ORDERED.

/S/ Carol Fox Foelak

Carol Fox Foelak

Administrative Law Judge

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<sup>1</sup> Respondent Stitt was served with the OIP by December 12, 2017, and his Answer was due within twenty days of that date. *Andrew Stitt*, Admin. Proc. Rulings Release No. 5444, 2018 SEC LEXIS 55 (A.L.J. Jan. 10, 2017).

<sup>2</sup> The Division of Enforcement filed a letter generally urging ratification.

<sup>3</sup> Previously, the Chief Administrative Law Judge ratified her designation of the undersigned as the presiding administrative law judge in this proceeding. *Andrew Stitt*, Admin. Proc. Rulings Release No. 4240, 2016 SEC LEXIS 3833 (C.A.L.J. Oct. 11, 2016); *Pending Admin. Proc.*, Admin. Proc. Rulings Release No. 5247, 2017 SEC LEXIS 3780 (C.A.L.J. Dec. 4, 2017).