

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

ADMINISTRATIVE PROCEEDINGS RULINGS

Release No. 5762/May 30, 2018

ADMINISTRATIVE PROCEEDING

File No. 3-17849

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In the Matter of

ANGEL OAK CAPITAL PARTNERS, LLC, : PREHEARING ORDER  
PERAZA CAPITAL & INVESTMENT, LLC, :  
SREENIWAS PRABHU, and :  
DAVID W. WELLS :

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The Securities and Exchange Commission instituted this proceeding with a Corrected Order Instituting Proceedings (OIP), pursuant to Sections 15(b) and 21C of the Securities Exchange Act of 1934, on February 16, 2017.<sup>1</sup> Only Peraza Capital & Investment, LLC, remains in the proceeding: the OIP, pursuant to Respondents' Offers of Settlement, made various findings of fact and conclusions of law, imposed various sanctions on them, and ordered additional proceedings to determine what, if any, disgorgement and civil penalties are appropriate as to Peraza Capital. *Angel Oak Capital Partners*, Exchange Act Release No. 80053, 2017 SEC LEXIS 474 (Feb. 16, 2017). Thereafter, on the Division of Enforcement's motion for summary disposition, the presiding Administrative Law Judge decided certain legal issues concerning disgorgement and civil penalties. *Angel Oak Capital Partners*, Admin. Proc. Rulings Release No. 5636, 2018 SEC LEXIS 630 (A.L.J. Feb. 28, 2018). A procedural schedule to address remaining issues was set, then postponed when Peraza Capital's counsel withdrew. *Angel Oak Capital Partners*, Admin. Proc. Rulings Release Nos. 5655, 2018 SEC LEXIS 759 (A.L.J. Mar. 19, 2018); 5670, 2018 SEC LEXIS 840 (A.L.J. Apr. 4, 2018). On May 17, 2018, new counsel for Peraza Capital entered their notice of appearance.

A prehearing conference was held today. John D. Worland, Jr., Fuad Rana, and Christina M. Adams, Esqs. appeared on behalf of the Division, and Mark David Hunter and Jenny D. Johnson-Sardella, Esqs., of Hunter Taubman Fischer & Li LLC, on behalf of Peraza Capital.

The parties will address issues that they wish to argue concerning the Division's previous request for disgorgement of approximately \$1,180,487.98 and a first-tier civil penalty of \$75,000 in filings according to the following schedule: June 28, 2018 – opening briefs; July 12, 2018 – replies.

IT IS SO ORDERED.

/S/ Carol Fox Foelak  
Carol Fox Foelak  
Administrative Law Judge

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<sup>1</sup> The undersigned was designated presiding Administrative Law Judge as of May 11, 2018. *Angel Oak Capital Partners*, Admin. Proc. Rulings Release No. 5723, 2018 SEC LEXIS 1114 (C.A.L.J. May 11, 2018).