

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

Administrative Proceedings Rulings
Release No. 6648 / August 5, 2019

Administrative Proceeding
File No. 3-17184

In the Matter of

Christopher M. Gibson

Post-Hearing Order

The hearing in this administrative proceeding concluded August 2, 2019. During the hearing, I issued instructions to the parties. This order memorializes and supplements those instructions:

(1) The parties are responsible for filing copies of their exhibits, both admitted and offered but not admitted, in hardcopy with the Securities and Exchange Commission's Office of the Secretary, and must do so by August 23, 2019. *See* 17 C.F.R. §§ 201.350, .351. If they have not already done so, the parties should also provide electronic copies of these exhibits to my office.

(2) When the parties file copies of their exhibits, they must also email to my office a list of exhibits admitted and offered but not admitted. The list should be in MS Excel or Word format and specify the exhibit number; description of the exhibit; Bates-stamp numbers, if any; and page(s) in the hearing transcript in which the exhibit was offered and admitted, if applicable.

(3) The parties may file simultaneous opening post-hearing briefs by September 13, 2019. Opening post-hearing briefs must not exceed 14,000 words. A motion for leave to exceed the word limit must be filed by September 6, 2019.

(4) If Gibson argues under 17 C.F.R. § 201.630 that he lacks the ability to pay disgorgement, interest, or penalties, he should file a completed Form D-A with his post-hearing brief.¹

(5) The parties may file proposed findings of fact and conclusions of law, consistent with 17 C.F.R. § 201.340, at the time opening post-hearing briefs are filed. Proposed findings of fact must be numbered and supported by citations to specific portions of the record. Each citation must be accompanied by a quotation of the language that supports the proposed finding. Proposed conclusions of law must be numbered and must be supported by citation to legal authority. Each citation must be accompanied by a quotation of the language from the legal authority that supports the proposed conclusion. Argument is not permitted in proposed findings and conclusions. I will strike findings or conclusions that contain argument.

(6) Any responsive post-hearing briefs are due by September 27, 2019, and must not exceed 7,000 words.

James E. Grimes
Administrative Law Judge

¹ A blank version of this form, including instructions on completing the form and requesting a protective order, is available at <https://www.sec.gov/alj/form-da.pdf>.