

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

ADMINISTRATIVE PROCEEDINGS RULINGS
Release No. 1636/July 21, 2014

ADMINISTRATIVE PROCEEDING
File No. 3-15900

In the Matter of

JOHN J. BRAVATA,
RICHARD J. TRABULSY, and
ANTONIO M. BRAVATA

:
: PREHEARING ORDER
:
:

The Securities and Exchange Commission instituted this proceeding with an Order Instituting Proceedings (OIP) on June 2, 2014, pursuant to Section 15(b) of the Securities Exchange Act of 1934 and 203(f) of the Investment Advisers Act of 1940. The proceeding is a follow-on proceeding based on United States v. Bravata, No. 2:11-cr-20314 (E.D. Mich.), in which Respondents John J. Bravata (John Bravata), Richard J. Trabulsy (Trabulsy), and Antonio M. Bravata (Antonio Bravata) were convicted of wire fraud and other offenses on December 11, 2013, April 15, 2014, and December 11, 2013, respectively; and SEC v. Bravata, No. 09-cv-12950 (E.D. Mich. May 29, 2014), in which Respondents were enjoined against violations of the antifraud and registration provisions of the securities laws. A prehearing conference was held today. All parties appeared.

Trabulsy, who was served with the OIP on June 27, 2014, affirmatively declined to defend the proceeding and was advised that the undersigned would enter an order barring him from the securities industry.

John Bravata has filed an Answer to the OIP, and Antonio Bravata has submitted his Answer (which is still in transit). The Division of Enforcement will make available its investigative file to each of them in a Concordance® format.¹ It is expected that each will have access to a computer to search the file in defending himself in these legal proceedings.² The Division of Enforcement was granted leave to file a motion for summary disposition pursuant to 17 C.F.R. § 201.250, which will be due by August 29, 2014. Respondents' oppositions will be due by September 26, 2014.

IT IS SO ORDERED.

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

¹ See Byron S. Rainer, Exchange Act Release No. 59040 (Dec. 2, 2008), 94 SEC Docket 12093; José P. Zollino, 58 S.E.C. 388 (2005).

² Each is currently incarcerated.