

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

ADMINISTRATIVE PROCEEDINGS RULINGS
Release No. 2551/April 16, 2015

ADMINISTRATIVE PROCEEDING
File No. 3-16427

In the Matter of

ROBERT J. LUNN

PROCEDURAL ORDER

On March 10, 2015, the Securities and Exchange Commission instituted this proceeding against Respondent pursuant to Section 15(b) of the Securities Exchange Act of 1934 and Section 203(f) of the Investment Advisers Act of 1940. The parties have filed a joint prehearing conference statement, discussing the items in Rule of Practice 221(c). Respondent's Answer is due April 22, 2015.

I ORDER the following procedural schedule as to summary disposition pursuant to Rule of Practice 250:

- April 29, 2015: The Division's motion for summary disposition is due.
- May 27, 2015: Respondent's opposition is due.
- June 3, 2015: The Division's reply, if any, is due.

The Division's motion shall include: 1) proposed findings of fact with citations to supporting evidence or documents; 2) proposed conclusions of law addressing, among any other issues, the statutory basis for this action and why the Division believes summary disposition is appropriate; and 3) what sanctions are in the public interest, including a discussion of the public interest factors under *Steadman v. SEC*, 603 F.2d 1126, 1140 (5th Cir. 1979), *aff'd on other grounds*, 450 U.S. 91 (1981), with citations to supporting evidence or documents. *See Ross Mandell*, Exchange Act Release No. 71668, 2014 SEC LEXIS 849, at *7-8 (Mar. 7, 2014). In his opposition, Respondent will then address whether he agrees or disagrees with the Division's arguments and the relief it seeks, and may set forth his own proposed findings and conclusions, with supporting evidence or documents. The parties are encouraged to file their supporting evidence or documents, if any, with a declaration identifying each exhibit with a short description.

The parties' submissions and any evidence or documents in support shall be filed with the Commission's Office of the Secretary in hard-copy paper format, pursuant to Rules 151 and 152. 17 C.F.R. §§ 201.151, .152. Electronic courtesy copies of the parties' submissions should be emailed to ALJ@sec.gov in both PDF text-searchable format and MS Word format. Electronic copies of the parties' exhibits should not be combined into a single PDF file, but submitted as separate attachments.

If upon consideration of the parties' submissions I find that a hearing is necessary, I will direct the parties to agree to a hearing date and prehearing procedural schedule.

Jason S. Patil
Administrative Law Judge