

UNITED STATES OF AMERICA  
before the  
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934  
Release No. 90846 / January 4, 2021

INVESTMENT ADVISERS ACT OF 1940  
Release No. 5660 / January 4, 2021

INVESTMENT COMPANY ACT OF 1940  
Release No. 34162 / January 4, 2021

Admin. Proc. File No. 3-18061

IN THE MATTER OF  
THOMAS ROSE, DAVID LEEMAN, and  
DAVID FEATHERSTONE

NOTICE THAT INITIAL DECISION HAS BECOME FINAL

The time for filing a petition for review of the initial decision in this proceeding has expired. No such petition has been filed by Thomas Rose, David Leeman, David Featherstone, or the Division of Enforcement, and the Commission has not chosen to review the decision on its own initiative.

Accordingly, notice is hereby given, pursuant to Rule 360(d) of the Commission's Rules of Practice,<sup>1</sup> that the initial decision of the administrative law judge has become the final decision of the Commission with respect to Thomas Rose, David Leeman, and David Featherstone.<sup>2</sup> The orders contained in that decision are hereby declared effective. The initial decision ordered that: (a) pursuant to 17 C.F.R. §§ 201.322 and 201.630(c), pages 1505 to 1514 of Respondents' appendix and accompanying exhibits shall be maintained under seal; (b) pursuant to Section 8A(e) of the Securities Act of 1933 and Sections 21B(e) and 21C(e) of the Securities Exchange Act of 1934, David Featherstone shall disgorge \$60,380, plus prejudgment interest; David Leeman shall disgorge \$24,343.50, plus prejudgment interest; and Thomas Rose shall disgorge \$297,360, plus prejudgment interest; (c) pursuant to Section 8A(g) of the Securities Act of 1933 and Section 21B(a)(1)-(2) of the Securities Exchange Act of 1934, David Featherstone, David Leeman, and Thomas Rose shall each pay a civil money penalty in

<sup>1</sup> 17 C.F.R. § 201.360(d).

<sup>2</sup> *Retirement Surety LLC, Crescendo Financial LLC, Thomas Rose, David Leeman, and David Featherstone*, Initial Decision Release No. 1392, 2019 WL 7284955 (Dec. 20, 2019).

the amount of \$3,750; and (d) pursuant to 17 C.F.R. § 201.1100, any funds recovered by disgorgement, prejudgment interest, and civil penalties be placed in a fair fund for the benefit of investors harmed by the violations.

For the Commission, by the Office of the General Counsel, pursuant to delegated authority.

Vanessa A. Countryman  
Secretary