

1 JOHN B. BULGOZDY, Cal Bar. No. 219897
Email: bulgozdyj@sec.gov
2 BERNARD B. SMYTH III, Cal. Bar No. 217741
Email: smythb@sec.gov

3 Attorneys for Plaintiff
4 Securities and Exchange Commission
Michele Wein Layne, Regional Director
5 John W. Berry, Regional Trial Counsel
5670 Wilshire Boulevard, 1 1th Floor
6 Los Angeles, California 90036
Telephone: (323) 965-3998
7 Facsimile: (323) 965-3908

8
9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 SECURITIES AND EXCHANGE
12 COMMISSION,

13 Plaintiff,

14 vs.

15 NEWPOINT FINANCIAL SERVICES,
16 INC.; JOHN FARAHI; GISSOU
RASTEGAR FARAHI; and ELAHEH
AMOUEI,

17 Defendants,

18 and

19 TRIPLE "J" PLUS, LLC; QUIFF
20 INVESTMENTS, LTD.; JUSTIN P.
FARAHI; and JOSHUA A. FARAHI,

21 Relief Defendants.
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Case No. CV-10-0124 DDP (JEMx)

**STIPULATION TO DISMISS
CLAIMS FOR CIVIL PENALTY AND
FOR ENTRY OF FINAL JUDGMENT
AGAINST DEFENDANT ELAHEH
AMOUEI**

1 Plaintiff Securities and Exchange Commission (“SEC”) and Defendant
2 Elaheh Amouei (“Defendant”) hereby agree and stipulate as follows:

3 WHEREAS, on September 18, 2010, Defendant consented to entry of a final
4 judgment of permanent injunction, which, among other things, ordered Defendant
5 to pay a civil penalty in an amount to be determined at a later date; and

6 WHEREAS, the parties agree that a civil penalty pursuant to Section 20(d)
7 of the Securities Act, 15 U.S.C., § 77t(d); and Section 21(d) of the Exchange Act,
8 15 U.S.C. § 78(d)(3), is appropriate in this case; however, the SEC has determined
9 to dismiss its claim for a civil penalty, and

10 WHEREAS, Defendant agrees that, in all other respects, the provisions of
11 the Consent he signed on September 18, 2010, and filed with this Court as Docket
12 No. 192 are binding and remain in effect.

13 NOW THEREFORE, IT IS STIPULATED AND AGREED that:

14 1. The SEC and Defendant stipulate to the dismissal of the SEC’s claims
15 for a civil penalty.

16 2. The SEC and Defendant stipulate to the entry of a Final Judgment of
17 Permanent Injunction in the form agreed to and submitted to the Court as a
18 proposed order herewith.

19
20 Respectfully submitted,

21 Dated: May 23, 2014

22 /s/ John B. Bulgozdy
23 John B. Bulgozdy
24 Bernard B. Smyth III
25 Attorneys for Plaintiff
26 Securities and Exchange Commission

27 Dated: May 23, 2014

28 /s/ Clyde DeWitt
Clyde DeWitt
Law Offices of Clyde DeWitt
Attorney for Defendant
Elaheh Amouei

PROOF OF SERVICE

I am over the age of 18 years and not a party to this action. My business address is:

U.S. SECURITIES AND EXCHANGE COMMISSION, 5670 Wilshire Boulevard, 11th Floor, Los Angeles, California 90036-3648

Telephone No. (323) 965-3998; Facsimile No. (323) 965-3908.

On May 27, 2014, I caused to be served the document entitled **STIPULATION TO DISMISS CLAIMS FOR CIVIL PENALTY AND FOR ENTRY OF FINAL JUDGMENT AGAINST DEFENDANT ELAHEH AMOUEI** on all the parties to this action addressed as stated on the attached service list:

OFFICE MAIL: By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices. I am readily familiar with this agency’s practice for collection and processing of correspondence for mailing; such correspondence would be deposited with the U.S. Postal Service on the same day in the ordinary course of business.

PERSONAL DEPOSIT IN MAIL: By placing in sealed envelope(s), which I personally deposited with the U.S. Postal Service. Each such envelope was deposited with the U.S. Postal Service at Los Angeles, California, with first class postage thereon fully prepaid.

EXPRESS U.S. MAIL: Each such envelope was deposited in a facility regularly maintained at the U.S. Postal Service for receipt of Express Mail at Los Angeles, California, with Express Mail postage paid.

HAND DELIVERY: I caused to be hand delivered each such envelope to the office of the addressee as stated on the attached service list.

UNITED PARCEL SERVICE: By placing in sealed envelope(s) designated by United Parcel Service (“UPS”) with delivery fees paid or provided for, which I deposited in a facility regularly maintained by UPS or delivered to a UPS courier, at Los Angeles, California.

ELECTRONIC MAIL: By transmitting the document by electronic mail to the electronic mail address as stated on the attached service list.

E-FILING: By causing the document to be electronically filed via the Court’s CM/ECF system, which effects electronic service on counsel who are registered with the CM/ECF system.

FAX: By transmitting the document by facsimile transmission. The transmission was reported as complete and without error.

I declare under penalty of perjury that the foregoing is true and correct.

Date: May 27, 2014

/s/ John B. Bulgozdy
John B. Bulgozdy

1 **SEC v. NEWPOINT FINANCIAL SERVICES, INC., et al.**
2 **United States District Court – Central District of California**
3 **Case No. CV 10-0124 DDP (JEMx)**
4 **(LA-3663)**

5 **SERVICE LIST**

6 Byron Z. Moldo, Esq.
7 Ervin Cohen & Jessup LLP
8 9401 Wilshire Boulevard, 9th Floor
9 Beverly Hills, CA 90212-2974
10 Email: bmoldo@ecjlaw.com
11 ***Attorney for Court-Appointed Receiver for Defendant NewPoint***
12 ***Financial Services, Inc. and related companies***

13 Gary S. Lincenberg, Esq.
14 Bird, Marella, Boxer, Wolpert, Nessim, Drooks & Lincenberg
15 1875 Century Park East, 23rd Floor
16 Los Angeles, CA 90067-2561
17 Email: gsl@birdmarella.com
18 ***Attorney for Defendant John Farahi***

19 Clyde DeWitt, Esq.
20 Law Offices of Clyde DeWitt, APC
21 6525 W. Warm Springs Road, Suite 100
22 Las Vegas, NV 89118
23 Email: clydedewitt@earthlink.net
24 ***Attorney for Defendant Elaheh Amouei***

25 Jerome A. Kaplan, Esq.
26 Kaplan Kenegos & Kadin
27 9150 Wilshire Boulevard, Suite 175
28 Beverly Hills, CA 90212
29 Email: kapkenkd@pacbell.net
30 ***Attorney for Defendant Gissou Farahi and Relief Defendant Quiff***
31 ***Investments, Ltd.***

32 David K. Willingham, Esq.
33 Matthew O'Brien, Esq.
34 Caldwell Leslie & Proctor, PC
35 725 S. Figueroa Street, 31st Floor
36 Los Angeles, CA 90017
37 Email: willingham@caldwell-leslie.com
38 Email: obrien@caldwell-leslie.com
39 ***Attorneys for Relief Defendants Justin Farahi and Joshua Farahi***

40 Bruce J. Altshuler, Esq.
41 Altshuler & Spiro
42 9301 Wilshire Boulevard, Suite 504
43 Beverly Hills, CA 90210
44 Email: bjaltshuler@sbcglobal.net
45 ***Attorney for Intervenor Parviz Banafshe***