

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 11-60673-CIV-DIMITROULEAS/Snow**

**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**v.**

**JAMES CLEMENTS AND ZEINA SMIDI,**

**Defendants.**

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**FINAL JUDGMENT AS TO DEFENDANT ZEINA SMIDI**

It is hereby **ORDERED AND ADJUDGED** the Final Judgment is entered against Defendant Zeina Smidi as follows:

**DISGORGEMENT & CIVIL PENALTY**

Defendant is liable for disgorgement of \$2,492,000, representing profits gained as a result of the conduct alleged in the Complaint, together with prejudgment interest thereon in the amount of \$611,837.60, and a civil penalty in the amount of \$2,492,000. Defendant shall satisfy this obligation by paying \$5,595,837.60, within 14 days after the entry of this Final Judgment.

**PAYMENT INSTRUCTIONS**

Defendant may transmit payment electronically to the Commission, which will provide detailed ACH transfer/Fedwire instructions upon request. Payment may also be made directly from a bank account or by credit or debit card via Pay.gov through the SEC website at <http://www.sec.gov/about/offices/ofm.htm>. Defendant may also pay by certified check, bank

cashier's check, or United States postal money order payable to the Securities and Exchange Commission, which shall be delivered or mailed to

Enterprise Services Center  
Accounts Receivable Branch  
6500 South MacArthur Boulevard  
Oklahoma City, OK 73169

and shall be accompanied by a letter identifying the case title, civil action number, and name of this Court; Zeina Smidi as a defendant in this action; and specifying that payment is made pursuant to this Final Judgment.

Defendant shall simultaneously transmit photocopies of evidence of payment and case identifying information to: Adam Schwartz, Senior Trial Counsel, U.S. Securities & Exchange Commission, 801 Brickell Avenue, Suite 1800, Miami, FL, 33131. By making this payment, Defendant relinquishes all legal and equitable right, title, and interest in such funds and no part of the funds shall be returned to Defendant. The Commission shall send the funds paid pursuant to this Final Judgment to the United States Treasury.

The Commission may enforce the Court's judgment for disgorgement and prejudgment interest by moving for civil contempt (and/or through other collection procedures authorized by law) at any time after 14 days following entry of this Final Judgment. Defendant shall pay post judgment interest on any delinquent amounts pursuant to 28 U.S.C. § 1961.

The Defendant shall not seek or accept, directly or indirectly, reimbursement or indemnification from any source, including but not limited to payment made pursuant to any insurance policy, with regard to any civil penalty amount she pays pursuant to this Final Judgment, regardless of whether such penalty amounts or any party thereof are added to a distribution fund or otherwise used for the benefit of investors. The Defendant further shall not

claim, assert, or apply for tax deduction or tax credit with regard to any federal, state, or local tax for any penalty amounts she pays pursuant to this Final Judgment, regardless of whether such penalty amounts or any part thereof are added to a distribution fund or otherwise used for the benefit of investors.

**DONE AND ORDERED** in chambers, on this 21 day of May, 2012,  
at Fort Lauderdale, Broward County, Florida.

  
**WILLIAM P. DIMITROULEAS**  
UNITED STATES DISTRICT JUDGE

Copies to counsel ~~and parties of record~~