

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 15-CV-81342-MARRA

SECURITIES AND EXCHANGE COMMISSION,	)
	)
<b>Plaintiff,</b>	)
	)
v.	)
	)
SANCTUM PUBLISHING AND MARKETING,	)
LIMITED, SANCTUM MEDIA GROUP, INC.,	)
and SALVATORE RENALDI,	)
	)
<b>Defendants,</b>	)
	)
and	)
	)
THE SANCTUM GROUP OF COMPANIES, INC.,	)
	)
<b>Relief Defendant.</b>	)
_____	)

**FINAL JUDGMENT OF DISGORGEMENT, PREJUDGMENT INTEREST,  
AND CIVIL PENALTY AS TO DEFENDANTS AND RELIEF DEFENDANT**

THIS CAUSE is before the Court upon Plaintiff ‘s Notice of Filing Consent of Defendants and Relief Defendants and Unopposed Motion for Entry of Final Judgment of Disgorgement and Prejudgment Interest [DE 36] (“Motion”). It is hereby

ORDERED AND ADJUDGED that the Motion is granted. The Securities and Exchange Commission commenced this action by filing its Complaint against Defendants Salvatore Renaldi, Sanctum Publishing and Marketing, Limited (“SPM”), and Sanctum Media Group, Inc. (“SMG”) and Relief Defendant The Sanctum Group of Companies, Inc. (“SGC”) (DE 1). In its Complaint, the Commission sought, among other relief, a permanent injunction against Renaldi, SPM, and SMG to prohibit violations of Section 17(a) of the Securities Act of 1933 (“Securities Act”), 15 U.S.C. § 77q(a), and Section 10(b) and Rule 10b-5 of the Securities Exchange Act of 1934

(“Exchange Act”), 15 U.S.C. § 78j(b) and 17 C.F.R. § 240.10b-5, and against Renaldi individually to prohibit violations of Section 15(a) of the Securities Act; disgorgement of ill-gotten gains and prejudgment interest from Renaldi, SPM, SMG and Relief Defendant SGC; and a civil penalty against Renaldi, SPM, and SMG pursuant to Section 20(d) of the Securities Act, 15 U.S.C. § 77t(d)(3) and Section 21(d)(3) of the Exchange Act, 15 U.S.C. § 78(d)(3). This Court previously entered a Judgment of Permanent Injunction and Other Relief as to Defendants and Relief Defendant (DE 33).

Defendants and Relief Defendant have entered an appearance and consented to the Court’s jurisdiction over them and over the subject matter of this action, have consented to entry of this Final Judgment of Disgorgement, Prejudgment Interest, and Civil Penalty (“Final Judgment”) without admitting or denying the allegations of the Complaint (except as to subject matter and personal jurisdiction, which they admit); waived findings of fact and conclusions of law; and waived any right to appeal from the Final Judgment. This Court, having accepted such Consent, having jurisdiction over Defendants and Relief Defendant and the subject matter of this action, and being fully advised in the premises, orders as follows:

**I.**

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that Defendants Renaldi, SPM, and SMG, are liable, on a joint and several basis, for disgorgement of \$1,589,500, representing the amounts raised as a result of the conduct alleged in the Complaint, together with prejudgment interest thereon in the amount of \$96,164.17, for a total of \$1,685,664.17. Relief Defendant SGC is liable for disgorgement of \$367,700, representing profits gained as a result of the conduct alleged in the Complaint, together with prejudgment interest thereon in the amount of \$17,821.06, for a total of \$385,521.06. Defendants shall satisfy this obligation by paying

\$1,685,664.17, and Relief Defendant shall satisfy this obligation by paying \$385,521.06, to the Securities and Exchange Commission within 14 days after entry of this Final Judgment.

Defendants and Relief 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 via Pay.gov through the SEC website at <http://www.sec.gov/about/offices/ofm.htm>. Defendants and Relief 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; Salvatore Renaldi, Sanctum Publishing and Marketing, Limited, Sanctum Media Group, Inc. as defendants, and The Sanctum Group of Companies, Inc. as a relief defendant, in this action; and specifying that payment is made pursuant to this Final Judgment.

Simultaneous to such payment, Defendants and Relief Defendant shall transmit photocopies of evidence of payment and case identifying information to the Commission's counsel in this action. By making this payment, Defendants and Relief Defendant relinquish all legal and equitable right, title, and interest in such funds and no part of the funds shall be returned to Defendants or Relief Defendant.

The Commission shall hold the funds (collectively, the "Fund") and may propose a plan to distribute the Fund subject to the Court's approval. The Court shall retain jurisdiction over the administration of any distribution of the Fund. If the Commission staff determines that the Fund

will not be distributed, 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. Defendants and Relief Defendant shall pay post judgment interest on any delinquent amounts pursuant to 28 U.S.C. § 1961.

**IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that Renaldi shall pay a civil penalty in the amount of \$1,589,500, and SPM and SMG shall each pay a civil penalty in the amount of \$775,000 to the Securities and Exchange Commission pursuant to Section 20(d) of the Securities Act [15 U.S.C. § 77t(d)] and Section 21(d)(3) of the Exchange Act [15 U.S.C. § 78u(d)(3)]. Defendants shall make this payment within 14 days after entry of this Final Judgment.

Defendants 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 via Pay.gov through the SEC website at <http://www.sec.gov/about/offices/ofm.htm>. Defendants 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

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and shall be accompanied by a letter identifying the case title, civil action number, and name of this Court; Salvatore Renaldi, Sanctum Publishing and Marketing, Limited, Sanctum Media Group, Inc. as defendants in this action; and specifying that payment is made pursuant to this Final Judgment.

Simultaneous to such payment, Defendants shall transmit photocopies of evidence of payment and case identifying information to the Commission's counsel in this action. By making this payment, Defendants relinquish all legal and equitable right, title, and interest in such funds and no part of the funds shall be returned to Defendants. The Commission shall send the funds paid pursuant to this Final Judgment to the United States Treasury. Defendants shall pay post-judgment interest on any delinquent amounts pursuant to 28 USC § 1961.

**II.**

**IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that, solely for purposes of exceptions to discharge set forth in Section 523 of the Bankruptcy Code, 11 U.S.C. §523, the allegations in the complaint are true and admitted by Defendant Renaldi, and further, any debt for disgorgement, prejudgment interest, civil penalty or other amounts due by Renaldi under this Final Judgment or any other judgment, order, consent order, decree or settlement agreement entered in connection with this proceeding, is a debt for the violation by Renaldi of the federal securities laws or any regulation or order issued under such laws, as set forth in Section 523(a)(19) of the Bankruptcy Code, 11 U.S.C. §523(a)(19).

**III.**

**IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that this Court shall retain jurisdiction of this matter for the purposes of enforcing the terms of this Final Judgment. Any

pending motions are denied as moot. This case is closed.

**DONE AND ORDERED** in Chambers in West Palm Beach, Florida on this 23<sup>rd</sup> day of  
May, 2016.



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KENNETH A. MARRA  
United States District Judge