

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**v.**

**BENJAMIN DANIEL DEHAAN and  
LIGHTHOUSE FINANCIAL  
PARTNERS, LLC,**

**Defendants**

**Civil Action File No.**

**1:12-CV-1996-TWT**

**ORDER OF PERMANENT INJUNCTION AS TO DEFENDANTS DEHAAN  
AND LIGHTHOUSE, AND ORDER CONTINUING FREEZE AND OTHER  
ANCILLARY RELIEF**

The Securities and Exchange Commission having filed a Complaint and Defendants Benjamin Daniel DeHaan (“DeHaan”) and Lighthouse Financial Partners, LLC (“Lighthouse”) each having entered a general appearance; consented to the Court’s jurisdiction over them and the subject matter of this action; consented to entry of this Order of Permanent Injunction without admitting or denying the allegations of the Complaint (except as to jurisdiction); waived findings of fact and conclusions of law; and waived any right to appeal from this Order of Permanent Injunction:

**I.**

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that Defendant Lighthouse was at all relevant times an “investment adviser” within the meaning of Section 202(a)(11) of the Investment Advisers Act of 1940 (“Advisers Act”) [15 U.S.C. § 80b-2(a)(11)], and that defendants Lighthouse and DeHaan (as the alter-ego of Lighthouse), and their agents, servants, employees, attorneys, and all persons in active concert or participation with them who receive actual notice of this Order of Permanent Injunction by personal service or otherwise are hereby permanently restrained and enjoined directly or indirectly: (a) while acting knowingly or recklessly, employing devices, schemes, or artifices to defraud any client or prospective client; or (b) engaging in transactions, practices, or courses of business which operate as fraud or deceit upon a client or prospective client, by misrepresenting to clients how their funds will be or have been applied, in violation of Sections 206(1) and 206(2) of the Advisers Act of 1934 [15 U.S.C. §§ 80b-6(1), (2)], including, but not limited to, the unlawful taking of the investment funds of Lighthouse investment advisory clients.

**II.**

**IT IS FURTHER ORDERED** that, pending a later Motion To Set Disgorgement and Civil Penalties, the assets of defendants DeHaan and Lighthouse

shall continue to remain frozen, pursuant to the terms of earlier orders of this Court.

**III.**

**IT IS FURTHER ORDERED** that Defendants and their officers, agents, employees, servants, attorneys, any bank or financial institution holding any assets of the Defendants and all persons in active concert or participation with them, and each of them, are restrained and enjoined from destroying, transferring or otherwise rendering illegible all books, records, papers, ledgers, accounts, statements and other documents employed in any of such Defendants' businesses, which reflect the business activities of either of the Defendants, or which reflect the transactions described in the Commission's Complaint.

**IV.**

**IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED** that Defendants DeHaan and Lighthouse shall pay disgorgement of ill-gotten gains, prejudgment interest thereon, and a civil penalty pursuant to Section 209(e) of the Investment Advisers Act [15 U.S.C. § 80b-9]. The Court shall determine the amounts of the disgorgement and civil penalty upon motion of the Commission at a later date. Prejudgment interest shall be calculated from May 1, 2012, based on the rate of interest used by the Internal Revenue Service for the underpayment of federal income tax as set forth in 26 U.S.C. § 6621(a)(2). In

connection with the Commission's motion for disgorgement and/or civil penalties, and at any hearing held on such a motion: (a) Defendants will be precluded from arguing that he/it did not violate the federal securities laws as alleged in the Complaint; (b) Defendants may not challenge the validity of the Consent or this Order of Permanent Injunction; but may challenge the appropriateness of the amount of disgorgement to be ordered and/or the amount of the civil penalty to be ordered; (c) solely for the purposes of such motion, the allegations of the Complaint shall be accepted as and deemed true by the Court; and (d) the Court may determine the issues raised in the motion on the basis of affidavits, declarations, excerpts of sworn deposition testimony or sworn investigative testimony, and documentary evidence, without regard to the standards for summary judgment contained in Rule 56(c) of the Federal Rules of Civil Procedure. In connection with the Commission's motion for disgorgement and/or civil penalties, the parties may take discovery, including discovery from appropriate non-parties.

**V.**

**IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that the Consent of defendants DeHaan and Lighthouse are incorporated herein with the same force and effect as if fully set forth herein, and that Defendants shall comply with all of the undertakings and agreements set forth therein.

**VI.**

**IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that this Order does not alter the status of the court-appointed receivership of Defendant Lighthouse, which shall remain open until all matters related thereto have been concluded, including but not limited to disposal of the remaining properties held by the receiver estate.

**VII.**

**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 Order of Permanent Injunction.

Dated: October 10, 2012

/s/Thomas W. Thrash  
Thomas W. Thrash, Judge  
United States District Court