

UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549

ADMINISTRATIVE PROCEEDINGS RULINGS  
Release No. 2112/December 9, 2014

ADMINISTRATIVE PROCEEDING  
File No. 3-15858

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In the Matter of	:	
	:	ORDER
STANLEY JONATHAN	:	
FORTENBERRY (A/K/A S.J.	:	
FORTENBERRY, JOHN	:	
FORTENBERRY, AND	:	
JOHNNY FORTENBERRY)	:	

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During the hearing in this matter, reference was made to \$100,000 invested by Dr. Allen Anderson. *See* Transcript at 237, 342, 695, 722, 747. The Division of Enforcement has argued that “Dr. Allen Anderson invested *approximately* \$100,000 in Premier,” Division Brief at 14 (emphasis added), apparently recognizing that the dollar figures listed in its brief and by its expert do not add up to \$100,000. *See id.*; Division Exhibit 149 at Exhibit C. The figures in the Division’s brief instead appear to yield a figure of \$98,000 and the figures in the expert’s report appear to yield a figure of \$97,900. Accordingly, within 14 days, the parties are each ORDERED to submit a letter or memorandum explaining the exact amount of Dr. Anderson’s investment. The parties shall support this explanation with reference to the exact payments Dr. Anderson made and the dates on which he made them. In addition to filing the letter or memorandum with the Office of the Secretary, the parties are encouraged to send a courtesy copy to [alj@sec.gov](mailto:alj@sec.gov).

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James E. Grimes  
Administrative Law Judge