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

ADMINISTRATIVE PROCEEDINGS RULINGS Release No. 3971/July 7, 2016

ADMINISTRATIVE PROCEEDING File No. 3-16463

In the Matter of

AEGIS CAPITAL, LLC, CIRCLE ONE WEALTH MANAGEMENT, LLC, DIANE W. LAMM, STRATEGIC CONSULTING ADVISORS, LLC, AND DAVID I. OSUNKWO ORDER ON DIVISION'S OBJECTIONS

The Division of Enforcement has filed objections to the witness and exhibit lists filed by Respondents Strategic Consulting Advisors, LLC, and David I. Osunkwo. On relevance grounds, the Division objects to the inclusion of three witnesses on Respondents' witness list. The Division objects to Respondents' exhibit list because, although the parties were obligated to file exhibit lists and exchange pre-marked exhibits by June 27, 2016, Respondents waited until July 4, 2016, to e-mail their exhibit list and, as of July 5, 2016, have not provided pre-marked copies of their exhibits.

The Division's objection to Respondents' witnesses is DENIED without prejudice to renewal during the hearing. I will defer consideration of the Division's objection to Respondents' exhibits. Respondents shall forthwith respond to the Division's objection and explain the reason for their delay in complying with the deadline related to exhibits and their exhibit list. The Division's deadline to file motions in limine related to Respondents' exhibits is extended to July 14, 2016. Owing to their delay in submitting their exhibit list, Respondents shall have until 1:00 p.m. EDT on July 19, 2016, to respond to any such motion in limine. The Division's current objection, Respondents' response, and any motion in limine related to Respondents' exhibits will be addressed during a prehearing conference currently scheduled to occur on July 20, 2016. That conference will take place at 1:30 p.m. EDT.

James E. Grimes Administrative Law Judge