

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

Administrative Proceedings Rulings  
Release No. 5201 / October 25, 2017

Administrative Proceeding  
File No. 3-18119

In the Matter of

**James M. Palladino**

**Order to Show Cause**

The Securities and Exchange Commission issued an order instituting proceedings (OIP) against Respondent on August 18, 2017, pursuant to Section 15(b) of the Securities Exchange Act of 1934.

I found that Respondent was personally served with the OIP on September 21, 2017, and that his answer was due by October 11, 2017. *James M. Palladino*, Admin. Proc. Rulings Release No. 5092, 2017 SEC LEXIS 2991 (ALJ Sept. 25, 2017). Respondent has not filed an answer.

Accordingly, I ORDER Respondent to SHOW CAUSE by November 13, 2017, why this proceeding should not be determined against him due to his failure to file an answer or otherwise defend this proceeding. If Respondent fails to respond to this order, I will ask the Division of Enforcement to file a motion for default and sanctions, after which Respondent may be deemed in default and the proceeding determined against him. *See* OIP at 2-3; 17 C.F.R. §§ 201.155(a)(2), .220(f). If Respondent would like to attend a telephonic prehearing conference he should notify this office by November 13, 2017, and I will schedule one at a date and time convenient to the parties.

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Jason S. Patil  
Administrative Law Judge