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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 U.S. SECURITIES AND EXCHANGE
12 COMMISSION,

13 Plaintiff,

14 v.

15 NATHANIEL BROWN, BENJAMIN WYLAM,
16 NAVEEN SOOD, MARCUS BANNON,
17 MATTHEW RAUCH, and NARESH RAMAIYA,

18 Defendants.

Case No. 3:21-cv-04594-EMC

**FINAL JUDGMENT AS TO
DEFENDANT NATHANIEL
BROWN**

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20 The Securities and Exchange Commission having filed a Complaint, and Defendant
21 Nathaniel Brown (“Defendant”) having entered a general appearance; consented to the Court’s
22 jurisdiction over Defendant and the subject matter of this action; consented to entry of this Final
23 Judgment; waived findings of fact and conclusions of law; and waived any right to appeal from
24 this Final Judgment:
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I.

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2 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that Defendant is
3 permanently restrained and enjoined from violating, directly or indirectly, Section 10(b) of the
4 Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. § 78j(b), and Rule 10b-5
5 thereunder, 17 C.F.R. § 240.10b-5, by using any means or instrumentality of interstate
6 commerce, or of the mails, or of any facility of any national securities exchange, in connection
7 with the purchase or sale of any security:

- 8
- 9 (a) to employ any device, scheme, or artifice to defraud;
 - 10 (b) to make any untrue statement of a material fact or to omit to state a material fact
11 necessary in order to make the statements made, in the light of the circumstances
12 under which they were made, not misleading; or
 - 13 (c) to engage in any act, practice, or course of business which operates or would
14 operate as a fraud or deceit upon any person.

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16 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as provided in
17 Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also binds the following who
18 receive actual notice of this Judgment by personal service or otherwise: (a) Defendant’s officers,
19 agents, servants, employees, and attorneys; and (b) other persons in active concert or
20 participation with Defendant or with anyone described in (a).

21 II.

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23 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Defendant’s Consent
24 is incorporated herein with the same force and effect as if fully set forth herein, and that
25 Defendant shall comply with all of the undertakings and agreements set forth therein.
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III.

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2 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, for purposes of
3 exceptions to discharge set forth in Section 523 of the Bankruptcy Code, 11 U.S.C. § 523, the
4 allegations in the Complaint are true and admitted by Defendant, and further, any debt for
5 disgorgement, prejudgment interest, civil penalty or other amounts due by Defendant under this
6 Final Judgment or any other judgment, order, consent order, decree or settlement agreement
7 entered in connection with this proceeding, is a debt for the violation by Defendant of the federal
8 securities laws or any regulation or order issued under such laws, as set forth in Section
9 523(a)(19) of the Bankruptcy Code, 11 U.S.C. § 523(a)(19).
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IV.

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12 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that this Court shall retain
13 jurisdiction of this matter for the purposes of enforcing the terms of this Final Judgment.
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16 Dated: February 7, 2022


UNITED STATES DISTRICT JUDGE