

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 63184/October 27, 2010**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-14099**

**In the Matter of**

**STUART E. RAWITT,**

**Respondent.**

**ORDER INSTITUTING**  
**ADMINISTRATIVE PROCEEDINGS**  
**PURSUANT TO SECTION 15(b) OF THE**  
**SECURITIES EXCHANGE ACT OF 1934,**  
**MAKING FINDINGS, AND IMPOSING**  
**REMEDIAL SANCTIONS**

**I.**

The Securities and Exchange Commission (“Commission”) deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted pursuant to Section 15(b) of the Securities Exchange Act of 1934 against Stuart E. Rawitt (“Rawitt” or “Respondent”).

**II.**

In anticipation of the institution of these proceedings, Respondent has submitted an Offer of Settlement (the “Offer”) which the Commission has determined to accept. Solely for the purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, and without admitting or denying the findings herein, except as to the Commission’s jurisdiction over him and the subject matter of these proceedings, and the findings contained in Section III.2 below, which are admitted, Respondent consents to the entry of this Order Instituting Administrative Proceedings Pursuant to Section 15(b) of the Securities Exchange Act of 1934, Making Findings, and Imposing Remedial Sanctions (“Order”), as set forth below.

**III.**

On the basis of this Order and Respondent’s Offer, the Commission finds that

1. From September 2008 to January 2009, Rawitt offered for sale and sold securities without a having a securities license or being associated with a registered broker or dealer. Rawitt, 42 years old, is a resident of Marina Del Rey, California.

2. On July 15, 2010, an agreed judgment was entered by consent against Rawitt, permanently enjoining him from future violations of Sections 5(a) and 5(c) of the Securities Act of 1933, and Section 15(a) of the Exchange Act, in the civil action entitled Securities and Exchange Commission v. Rockwell Energy of Texas, LLC, et al., Civil Action Number 4:09-cv-4080, in the United States District Court for the Southern District of Texas.

3. The Commission's Complaint alleged that Rawitt sold limited partnership interests in a fraudulent and unregistered oil-and-gas offering based in Texas. According to the complaint, Rawitt received, directly or indirectly, sales or other promotional commissions as high as 40%, and pocketed \$275,000 in investor proceeds. The Complaint alleges he solicited investors through cold calls, and was neither licensed nor associated with a registered broker or dealer.

#### IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanctions agreed to in Respondent's Offer.

Accordingly, it is hereby ORDERED:

Pursuant to Section 15(b)(6) of the Exchange Act, that Respondent Rawitt be, and hereby is barred from association with any broker or dealer.

Any reapplication for association by the Respondent will be subject to the applicable laws and regulations governing the reentry process, and reentry may be conditioned upon a number of factors, including, but not limited to, the satisfaction of any or all of the following: (a) any disgorgement ordered against the Respondent, whether or not the Commission has fully or partially waived payment of such disgorgement; (b) any arbitration award related to the conduct that served as the basis for the Commission order; (c) any self-regulatory organization arbitration award to a customer, whether or not related to the conduct that served as the basis for the Commission order; and (d) any restitution order by a self-regulatory organization, whether or not related to the conduct that served as the basis for the Commission order.

For the Commission, by its Secretary, pursuant to delegated authority.

Elizabeth M. Murphy  
Secretary

Service List

Rule 141 of the Commission's Rules of Practice provides that the Secretary, or another duly authorized officer of the Commission, shall serve a copy of the Order Instituting Administrative Proceedings Pursuant to Section 15(b) of the Securities Exchange Act of 1934, Making Findings, and Imposing Remedial Sanctions ("Order") on the Respondent and his legal agents.

The attached Order has been sent to the following parties and other persons entitled to notice:

Honorable Brenda P. Murray  
Chief Administrative Law Judge  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549-2557

Jason C. Rodgers, Esq.  
Fort Worth Regional Office  
801 Cherry Street, Suite 1900  
Fort Worth, TX 76102

Mr. Stuart E. Rawitt  
c/o Richard C. Leonard, Esq.  
Leonard, Dicker & Schreiber, LLP  
9430 Olympic Blvd., Suite 400  
Beverly Hills, CA 90212

Richard C. Leonard, Esq.  
Leonard, Dicker & Schreiber, LLP  
9430 Olympic Blvd., Suite 400  
Beverly Hills, CA 90212  
(Counsel for Respondent)