



of the Commission's Rules of Practice, 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. Reeves, age 61, is an attorney licensed to practice in the State of Florida.
2. On February 5, 2013, the Commission filed a complaint against Reeves in SEC v. William G. Reeves. (S.D. Fl., Civil Action No. 2:13-cv-14048-KMM). On February 27, 2013, the court entered an order permanently enjoining Reeves, by consent, from future violations of Sections 5(a) and 5(c) of the Securities Act of 1933 ("Securities Act") and providing permanent injunctive relief under Sections 17(a)(2) and 17(a)(3) of the Securities Act .
3. The Commission's complaint alleged, among other things, that Reeves participated in an offering fraud conducted by We the People, Inc. of the United States ("WTP"), while serving as WTP's vice president and regulatory counsel. The Commission alleged that WTP sold its products without filing any registration statement and without a valid exemption from registration. Moreover, the Commission alleged, among other things, that WTP's marketing materials and offering documents misrepresented several important features of WTP's product, including its value and the safety and security of the investment.

### IV.

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

Accordingly, it is hereby ORDERED, effective immediately, as follows:

- A. Reeves is suspended from appearing or practicing before the Commission as an attorney for 5 years from the date of the Order.
- B. After 5 years from the date of the Order, Respondent may request that the Commission consider his application to resume appearing and practicing before the Commission as an attorney. The application should be sent to the attention of the Office of the General Counsel.
- C. In support of such an application, Respondent must provide a certificate of good standing from each state bar where Respondent is a member.
- D. In support of such an application, Respondent must also submit an affidavit truthfully stating, under penalty of perjury:
  1. that Respondent has complied with the Order;

2. that Respondent:
  - a. is not currently suspended or disbarred as an attorney by a court of the United States (or any agency of the United States) or the bar or court of any state, territory, district, commonwealth, or possession; and
  - b. since the entry of the Order, has not been suspended as an attorney for an offense involving moral turpitude by a court of the United States (or any agency of the United States) or the bar or court of any state, territory, district, commonwealth, or possession, except for any suspension concerning the conduct that was the basis for the Order;
3. that Respondent, since the entry of the Order, has not been convicted of a felony or misdemeanor involving moral turpitude as set forth in Rule 102(e)(2) of the Commission's Rules of Practice; and
4. that Respondent, since the entry of the Order:
  - a. has not been found by the Commission or a court of the United States to have committed a violation of the federal securities laws, except for any finding concerning the conduct that was the basis for the Order;
  - b. has not been charged by the Commission or the United States with a violation of the federal securities laws, except for any charge concerning the conduct that was the basis for the Order;
  - c. has not been found by a court of the United States (or any agency of the United States) or any state, territory, district, commonwealth, or possession, or any bar thereof, to have committed an offense involving moral turpitude, except for any finding concerning the conduct that was the basis for the Order; and
  - d. has not been charged by the United States (or any agency of the United States) or any state, territory, district, commonwealth, or possession, or any bar thereof, with having committed an offense involving moral turpitude, except for any charge concerning the conduct that was the basis for the Order.

E. If Respondent provides the documentation required in Paragraphs C and D, and the Commission determines that he truthfully attested to each of the items required in his

affidavit, he shall by Commission order be permitted to resume appearing and practicing before the Commission as an attorney.

F. If Respondent is not able to truthfully attest to the statements required in Subparagraphs D(2)(b) or D(4), Respondent shall provide an explanation as to the facts and circumstances pertaining to the matter and the Commission may hold a hearing to determine whether there is good cause to permit him to resume appearing and practicing before the Commission as an attorney.

By the Commission.

Elizabeth M. Murphy  
Secretary