

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 admitting the Commission’s jurisdiction over him and the subject matter of these proceedings, and the findings contained in Section III.2. below, Respondent consents to the entry of this Order Instituting Administrative Proceedings Pursuant to Rule 102(e) 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. Conratt, age 35, resides in Denver, Colorado. Conratt is licensed to practice law in Maryland. From September 2008 through October 2009, Conratt was a registered representative associated with a broker-dealer and an investment adviser registered with the Commission. He passed his series 7 exam in February 2009.

2. On December 26, 2013, a judgment was entered by consent against Conratt, permanently enjoining him from future violations of Section 10(b) of the Exchange Act and Rule 10b-5 thereunder, in the civil action entitled SEC v. Conratt, Civil Action No. 12 – 8676-JSR, in the United States District Court for the Southern District of New York. .

3. The Commission’s complaint alleged, among other things, that Conratt’s roommate misappropriated material nonpublic information about International Business Machines Corporation’s 2009 acquisition of SPSS Inc., illegally traded, and tipped that information to Conratt. The Commission further alleged that Conratt used that information to illegally trade and tipped the information to others who traded, and that the illegal trading resulted in ill-gotten gains exceeding \$1 million. The Commission alleged that, by knowingly or recklessly engaging in the conduct described in the complaint, Conratt violated Section 10(b) of the Exchange Act, and Rule 10b-5 thereunder.

IV.

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

Accordingly, it is hereby ORDERED pursuant to Rule 102(e)(3)(i) of the Commission's Rules of Practice, effective immediately, that Conradt is suspended from appearing or practicing before the Commission as an attorney.

By the Commission.

Elizabeth M. Murphy
Secretary