# UNITED STATES OF AMERICA Before the SECURITIES AND EXCHANGE COMMISSION

# SECURITIES EXCHANGE ACT OF 1934 Release No. 76977 / January 27, 2016

# ADMINISTRATIVE PROCEEDING File No. 3-17068

In the Matter of

#### SALVATORE RENALDI,

**Respondent.** 

# ORDER INSTITUTING ADMINISTRATIVE PROCEEDINGS PURSUANT TO SECTION 15(b) OF THE SECURITIES EXCHANGE ACT OF 1934 AND NOTICE OF HEARING

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 ("Exchange Act") against Salvatore Renaldi ("Respondent").

## II.

After an investigation, the Division of Enforcement alleges that:

## A. <u>RESPONDENT</u>

1. From 2012 through September 2015, Respondent was the Chief Executive Officer and majority shareholder of Sanctum Publishing & Marketing, Limited, Inc. ("SPM") and Sanctum Media Group, Inc. ("SMG"). During the time period alleged in the complaint below, Respondent raised at least \$1.5 million dollars for SPM and SMG through offerings of stock, notes, and debentures to at least 15 investors in Florida and elsewhere. Renaldi solicited investors directly and through sales agents, to whom he paid commissions and provided offering materials for investors. During this time period, Respondent was neither registered as a broker-dealer nor associated with a broker-dealer. Respondent, 48 years old, is a resident of Wellington, Florida.

#### B. <u>ENTRY OF THE INJUNCTION/RESPONDENT'S CRIMINAL CONVICTION</u>

2. On January 5, 2016, a default judgment was entered against Respondent, permanently enjoining him from future violations of Sections 15(a) and 17(a) of the Securities Act of 1933, and Section 10(b) of the Exchange Act and Rule 10b-5 thereunder, in the civil action entitled *Securities and Exchange Commission v. Salvatore Renaldi, et al.*, Civil Action Number 9:15-CV-81342, in the United States District Court for the Southern District of Florida.

3. The Commission's complaint alleged that, from at least 2012 until September 2015, Respondent raised at least \$1.5 million dollars through offerings of stock, notes, and debentures to investors in Florida and elsewhere. Respondent misappropriated investor funds, falsely stated to investors that their funds were invested, falsely touted his financial industry expertise, yet failed to disclose his prior civil and criminal violations of the securities laws, and otherwise engaged in a variety of conduct that operated as a fraud and deceit on investors. The complaint also alleged that Respondent solicited investors directly and through sales agents, to whom he paid commissions and provided offering materials for investors, at a time when he was neither registered as nor associated with a broker-dealer. The complaint also alleged that Respondent used the mail and instrumentalities of interstate commerce to offer and sell securities.

## III.

In view of the allegations made by the Division of Enforcement, the Commission deems it necessary and appropriate in the public interest that public administrative proceedings be instituted to determine:

A. Whether the allegations set forth in Section II hereof are true and, in connection therewith, to afford Respondent an opportunity to establish any defenses to such allegations; and

B. What, if any, remedial action is appropriate in the public interest against Respondent pursuant to Section 15(b) of the Exchange Act.

## IV.

IT IS ORDERED that a public hearing for the purpose of taking evidence on the questions set forth in Section III hereof shall be convened at a time and place to be fixed, and before an Administrative Law Judge to be designated by further order as provided by Rule 110 of the Commission's Rules of Practice, 17 C.F.R. § 201.110.

IT IS FURTHER ORDERED that Respondent shall file an Answer to the allegations contained in this Order within twenty (20) days after service of this Order, as provided by Rule 220 of the Commission's Rules of Practice, 17 C.F.R. § 201.220.

If Respondent fails to file the directed answer, or fails to appear at a hearing after being duly notified, the Respondent may be deemed in default and the proceedings may be determined against him upon consideration of this Order, the allegations of which may be deemed to be true as provided by Rules 155(a), 220(f), 221(f) and 310 of the Commission's Rules of Practice, 17 C.F.R. §§ 201.155(a), 201.220(f), 201.221(f) and 201.310.

This Order shall be served forthwith upon Respondent as provided for in the Commission's Rules of Practice.

IT IS FURTHER ORDERED that the Administrative Law Judge shall issue an initial decision no later than 210 days from the date of service of this Order, pursuant to Rule 360(a)(2) of the Commission's Rules of Practice.

In the absence of an appropriate waiver, no officer or employee of the Commission engaged in the performance of investigative or prosecuting functions in this or any factually related proceeding will be permitted to participate or advise in the decision of this matter, except as witness or counsel in proceedings held pursuant to notice. Since this proceeding is not "rule making" within the meaning of Section 551 of the Administrative Procedure Act, it is not deemed subject to the provisions of Section 553 delaying the effective date of any final Commission action.

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

Brent J. Fields Secretary