

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

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 77852 / May 18, 2016**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-17068**

**In the Matter of**

**SALVATORE RENALDI,**

**Respondent.**

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

**I.**

The Securities and Exchange Commission (“Commission”) previously instituted public administrative proceedings against Salvatore Renaldi (“Renaldi” or “Respondent”) pursuant to Section 15(b) of the Securities Exchange Act of 1934 (“Exchange Act”) on January 27, 2016. The Commission now deems it appropriate and in the public interest to enter this Order Making Findings and Imposing Remedial Sanctions Pursuant to Section 15(b) of the Securities Exchange Act of 1934 (“Order”).

**II.**

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.B.1 below, which are admitted, Respondent consents to the entry of this Order, as set forth below.

**III.**

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

**A. RESPONDENT**

From May 2012 to approximately September 2015, Respondent acted as an unregistered broker. Specifically, Respondent solicited investors through the phone and other means to make investments in companies that purportedly provided mobile marketing, publishing and advertising services. Respondent used several companies to solicit funds from investors: Sanctum Publishing & Marketing, Limited, Inc. (“SPM”), Sanctum Media Group, Inc. (“SMG”), and The Sanctum Group of Companies, Inc. (“SGC”) (collectively, “Sanctum”), and was the CEO

of each of the Sanctum entities. Respondent solicited money from investors by making materially false and fraudulent representations, and by concealing and omitting material facts concerning, among other things, his financial industry experience, the profitability of the investments offered, and the misappropriation of money from investors for the benefit of Respondent and his sales agents. Specifically, Respondent and his sales agents falsely represented to investors that invested funds would be used to grow the Sanctum entities' mobile marketing, publishing, and finance businesses. Instead, Respondent misappropriated funds and spent investor money on personal expenses. Respondent hired sales agents, gave them offering materials for each of the Sanctum entities' securities offerings, and compensated them for their solicitation efforts. Respondent, 48 years old, is a resident of Wellington, Florida.

## **B. ENTRY OF THE JUDGMENT AGAINST RESPONDENT**

1. On January 5, 2016, a final 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.

2. 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.

## **IV.**

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

Accordingly, it is HEREBY ORDERED pursuant to Section 15(b)(6) of the Exchange Act, that Respondent Renaldi be, and hereby is barred from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization; and

Pursuant to Section 15(b)(6) of the Exchange Act Respondent Renaldi be, and hereby is barred from participating in any offering of a penny stock, including: acting as a promoter, finder, consultant, agent or other person who engages in activities with a broker, dealer or issuer for purposes of the issuance or trading in any penny stock, or inducing or attempting to induce the purchase or sale of any penny stock.

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.

By the Commission.

Brent J. Fields  
Secretary