

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 97655 / June 6, 2023

ADMINISTRATIVE PROCEEDING
File No. 3-21015

In the Matter of

MARK W. HECKELE, ESQ.,

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”) 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 (“Exchange Act”) as to Respondent Mark W. Heckeles, Esq. (“Respondent”).

II.

Respondent has submitted an Offer of Settlement (the “Offer”) in the above-captioned public administrative proceeding instituted against him by the Commission on August 29, 2022, 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 paragraph III.2 below, which are admitted, Respondent consents to the entry of this Order Making Findings and Imposing Remedial Sanctions (“Order”), as set forth below.

III.

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

1. Respondent, age 43, is a resident of Friday Harbor, Washington.
2. On June 29, 2022, a final judgment was entered against Respondent, permanently enjoining him from future violations of Sections 5(a) and 5(c) of the Securities Act of 1933 (“Securities Act”, Section 10(b) of the Exchange Act and Rule 10b-5 thereunder, and Section

15(a) of the Exchange Act, in the civil action entitled *Securities and Exchange Commission v. Heckele, et al.*, Civil Action Number 20-cv-01493-MCS-SHK, in the United States District Court for the Central District of California.

3. The Commission's complaint alleged from at least January 2018 to September 2018, Respondent was the managing member of Green Growth Ventures, LLC ("GGV") and Extraction Capital Tier 1, LLC ("ECT1"), entities that engaged in unregistered securities offerings to ostensibly finance two marijuana-related businesses. The complaint alleged that: (i) Respondent made material misrepresentations to investors regarding expected returns on their investments by suggesting that GGV and ECT1 investors were guaranteed a return of 100 percent or more annually; and (ii) in offering materials he prepared, Respondent made material misrepresentations concerning the financial projections of GGV's and ECT1's underlying businesses. The complaint also alleged that Respondent sold unregistered securities and acted as an unregistered broker.

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) Respondent 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

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 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, compliance with the Commission's order and payment of any or all of the following: (a) any disgorgement or civil penalties ordered by a Court against the Respondent in any action brought by the Commission; (b) any disgorgement amounts ordered against the Respondent for which the Commission waived payment; (c) any arbitration award related to the conduct that served as the basis for the Commission order; (d) 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 (e) 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.

Vanessa A. Countryman
Secretary