

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

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 101981 / December 19, 2024**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-22368**

**In the Matter of**

**CHRISTOPHER S.**  
**KNIGHT,**

**Respondent.**

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

**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 Christopher S. Knight (“Respondent”).

**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, Respondent admits the Commission’s jurisdiction over him and the subject matter of these proceedings, and the findings contained in paragraph III.2. below, and consents to the entry of this Order Instituting Administrative Proceedings Pursuant to Section 15(b) of the Securities Exchange Act of 1934, 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. Knight co-owned and operated Program Funding Advisors, LLC (“PFA”), a Delaware limited liability company with its principal place of business in Old Brookville, New York. PFA, formed in approximately January 2012, was in the business of advising businesses on how to promote stock. From January 2012 until 2019, Knight participated in offerings of publicly traded stocks, including the penny stock offerings described below. Knight, 56 years old, is a resident of Miami, Florida.

2. Knight participated in offerings of the following stocks: Mainstream Entertainment, Inc. (OTC Market symbol “MSEI”); Resort Savers, Inc. (OTC Market symbol “RSSV”); Axiom Holdings, Inc. (OTC Market symbol “AIOM”); Union Bridge Holdings, Ltd. (OTC Market symbol “UGHL”); and Virtual Medical International, Inc. (OTC Market symbol “QEBR”), each of which is a penny stock.

3. On November 18, 2020, Knight pled guilty to one count of conspiracy to commit securities fraud, in violation of 18 U.S.C. §1349; three counts of securities fraud, in violation of 18 U.S.C. §1348; one count of conspiracy to commit securities and wire fraud, in violation of 18 U.S.C. §371; two counts of securities fraud, in violation of 15 U.S.C. §§ 78j(b) and 78ff and 17 C.F.R. §240.10b-5, and 18 U.S.C. §2; and one count of wire fraud, in violation of 18 U.S.C. §1343, before the United States District Court for the Eastern District of Pennsylvania, in United States v. Christopher Knight, Criminal No. 19-711-2.

4. The counts of the superseding criminal information to which Knight pled guilty alleged, inter alia, that:

a. From at least in or about April 2012, through at least in or about May 2014, Knight and others conspired to (1) defraud investors in the securities of MSEI, (2) fraudulently obtain investor monies and pay and receive undisclosed commissions, (3) artificially inflate the value of MSEI securities, and (4) enrich the members of the conspiracy. Knight fraudulently promoted MSEI stock, including by paying undisclosed commissions to co-conspirators who cold-called potential investors for the purpose of getting them to buy shares of that company. A co-conspirator received approximately \$989,362 in illicit proceeds from the sale of MSEI stock. The co-conspirator, or entities he controlled, sent wire transfers of approximately \$685,608 to PFA, an entity controlled by Knight and a co-conspirator. Another co-conspirator, who controlled MSEI, paid kickbacks to PFA of approximately \$843,007, related to transactions in MSEI stock.

b. From at least in or about October 2015, through at least in or about December 2019, Knight and others conspired to (1) defraud investors in the securities of RSSV, AIOM, QEBR, and UGHL (“the Manipulated Companies”), (2) fraudulently obtain investor monies and pay and receive undisclosed commissions, (3) artificially inflate the value of the Manipulated Companies, and (4) enrich the members of the conspiracy. Knight and his co-conspirators agreed to pump and dump the common stock of the Manipulated Companies, and Knight

recruited an individual to fraudulently induce investors to buy stock of those companies. In substance, Knight paid kickbacks to promoters who induced investors to purchase stock in MSEI and the Manipulated Companies, using proceeds from sales of stock of those issuers placed by the issuers' control person.

#### IV.

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

Accordingly, it is hereby ORDERED pursuant to Section 15(b)(6) of the Exchange Act, that Respondent Knight 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.

By the Commission.

Vanessa A. Countryman  
Secretary