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## UNITED STATES OF AMERICA Before the SECURITIES AND EXCHANGE COMMISSION Washington, D.C. 20549

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In the Matter of

DONALD J. ANTHONY, JR., FRANK H. CHIAPPONE, RICHARD D. FELDMANN, WILLIAM P. GAMELLO, ANDREW G. GUZZETTI, WILLIAM F. LEX, THOMAS E. LIVINGSTON, BRIAN T. MAYER, PHILIP S. RABINOVICH, and RYAN C. ROGERS,

ADMINISTRATIVE PROCEEDING File No. 3-15514

Respondents.

## NOTICE OF MOTIONS TO CORRECT MANIFEST ERROR OF FACT AND TO SUBMIT ADDITIONAL EVIDENCE.

PLEASE TAKE NOTICE, that upon the Affidavit of Frank H. Chiappone, the Affirmation of Roland M. Cavalier, and the exhibits thereto, Frank H. Chiappone makes this motion to the Hon. Brenda P. Murray, Chief Administrative Law Judge, to correct a computational error in here Initial Decision, dated February 25, 2015, pursuant to SEC Rule 410, coupled with a motion to the Commission for permission to submit additional evidence relating to the computational error, made pursuant to SEC Rule 452. The specific corrections requested to be made to the Initial Decision and the reasons for such request are set forth the Affidavit of Frank H. Chiappone. The statement of the reasonale grounds for the failure to adduce the additional evidence relating to

the computation error are set forth in the Affidavit of Frank H. Chiappone and the Affirmation of

Roland M. Cavalier.

Dated: March **3**, 2015 Albany, New York

Roland M. Cavalier, Esq. Tuczinski, Cavalier & Gilchrist, PC

To:

Hon. Brenda P. Murray, Chief ALJ U.S. Securities and Exchange Commission 100 F. Street, NE Mail Stop 1090 Washington, D.C. 20549

Securities & Exchange Commission Office of the Secretary U.S. Securities and Exchange Commission 100 F. Street, NE Mail Stop 1090 Washington, D.C. 20549

David Stoelting, Michael D. Birnbaum & Haimavathi V. Marlier Securities & Exchange Commission Division of Enforcement 200 Vesey Street – Suite 400 New York, NY 10281-1022