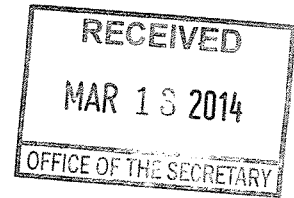


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING
File No. 3-15671

In the Matter of

PATRICK G. ROONEY

Respondent.


**DIVISION OF ENFORCEMENT'S
MOTION FOR SUMMARY
DISPOSITION AGAINST
RESPONDENT PATRICK G.
ROONEY**

The Division of Enforcement ("Division") hereby moves for summary disposition pursuant to Rules 154 and 250 of the Securities and Exchange Commission's Rules of Practice. The Division respectfully submits that summary disposition is appropriate and that the Court should resolve this proceeding in favor of the Division and impose a collateral bar in the public interest against Respondent Patrick G. Rooney.

In support of this Motion, the Division relies upon the accompanying memorandum of law and supporting exhibits. The Division respectfully requests that the Court grant this Motion.

Dated: March 12, 2014

Respectfully Submitted,

By: 

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