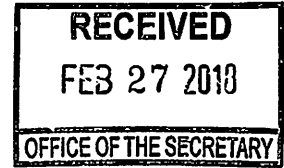


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**UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION**



Administrative Proceeding
File No. 3-16182

In the Matter of :
:
:
PAUL EDWARD "ED" LLOYD, JR. CPA :
:
Respondent. :
:
:
_____ :

**DIVISION'S RENEWED PETITION FOR CROSS REVIEW
OF THE INITIAL DECISION**

Pursuant to Rule 410(b) of the Commission's Rules of Practice, the Division of Enforcement hereby renews its cross-petition to the Commission for review of the summary disposition order of ALJ Foelak (the "Summary Disposition Order"). Specifically, the Summary Disposition Order dismissed the Division's claims under Section 17(a) of the Securities Act of 1933; Sections 10(b) and 15(a) of the Securities Exchange Act of 1934 and Rule 10b-5 thereunder; and Rule 206(4)-8 of the Investment Advisers Act of 1940. *Paul Edward "Ed" Lloyd, Jr., CPA*, Admin. Proc. Rulings Release No. 2366 (Feb. 27, 2015). Upon reassignment of the matter, ALJ Elliot ruled that he would not reconsider the Summary Disposition Order. The Division seeks review of these rulings. The Division also seeks review of ALJ Elliot's dismissal of the Division's claims under Sections 206(1) and (2) of the Advisers Act in his Initial Decision. *See Paul Edward "Ed" Lloyd, Jr., CPA*, Initial Decision No. 840 (July 27, 2015).

The Division previously cross-petitioned for review of these rulings in its Petition for Cross Review of the Initial Decision, which was filed on September 17, 2015 ("Initial Cross Petition"). That cross petition was rendered moot, however, when the Commission remanded

this case to the ALJ for ratification of the prior rulings in this matter. *See Pending Admin. Proc.*, Securities Act Release No. 10440, 2017 WL 5969234 (Nov. 30, 2017). Pursuant to that order, ALJ Elliot ratified the decisions that were the subject of the Division's initial cross petition. *See Paul Edward "Ed" Lloyd, Jr., CPA*, Admin. Proc. Rulings Release No. 5539 (Jan. 26, 2018).

The grounds for this Renewed Cross Petition are identical to those articulated in the Initial Cross Petition. The Division thus adopts and incorporates by reference herein the arguments set forth in the Initial Cross Petition.

This 26th day of February 2018.

Respectfully submitted,



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CERTIFICATE OF SERVICE


The undersigned counsel for the Division of Enforcement hereby certifies that he has served the **DIVISION's RENEWED PETITION FOR CROSS REVIEW OF THE INITIAL DECISION** by UPS overnight mail and electronic mail, to the individuals identified below:

Honorable Cameron Elliot
Administrative Law Judge
Securities and Exchange Commission
100 F Street NE
Room 2557
Washington, D.C. 20549-2557

Secretary Brent J. Fields (original and three copies)
Securities and Exchange Commission
100 F Street N.E.
Washington, DC 20549-1090

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Dated: February 26, 2018



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Attorney for Division of Enforcement