

August 20, 2015

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AUG 26 2015
OFFICE OF THE SECRETARY

Securities and Exchange Commission
Office of the Secretary
100 F Street, N.E., Room 10900
Mail Stop 1090
Washington, DC 20549-2557

Re: Administrative Proceedings
File No. 3-16668
Response to OIP

Dear Sir,

Safe Harbor Wealth Investments, Inc. (SHWI) operated as a Registered Investment Advisory firm from about 2001 until 2007. Because of the level of assets under management, SHWI was always under the oversight of the Ohio Division of Securities rather than the SEC. In 2007, SHWI ceased all activity related to its RIA license. All RIA contracts were terminated and SHWI withdrew all discretionary trading privileges for its former clients at TD Ameritrade.

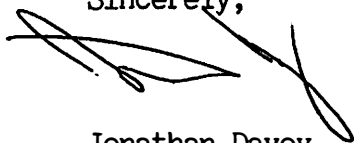
In 2007, Davey made a Reg D filing and began operating Divine Circulation Services, Ltd. Although SHWI no longer had any RIA clients or revenue and expenses from any RIA activity, SHWI and Davey did not terminate its RIA license but rather transferred it to a new and separate company in 2009 called Divine Stewardship LLC. In 2010, Divine Stewardship LLC voluntarily surrendered its license. During 2009, the State of Ohio Division of Securities performed its routine three year audit on SHWI. After discovering that SHWI had no RIA clients, it opened an investigation into SHWI and Divine Stewardship.

The State of Ohio contacted many (if not all) of SHWI's former Ohio clients. In 2010, the Ohio State Division of Securities closed its investigation on SHWI without accusing SHWI, Divine Stewardship, or Davey of any fraud, misrepresentation, or harm in any way to its clients. There is no connection between Davey's criminal conviction in February 2013 and the RIA activity of either SHWI or Divine Stewardship LLC.

Per the trial transcript of Davey's criminal trial, the conspiracy to commit securities fraud primarily dealt with Davey's failure to perform sufficient due diligence on the Black Diamond investment platform to uncover its fraudulent activity. However, per Davey's current appeal, Davey did not create any false statements or steal any client funds.

Davey asserts that the criminal penalties enforced upon him serve as a sufficient deterrent and requests that any subsequent civil enforcement not be permanent in nature.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan Davey', written over a horizontal line.

Jonathan Davey