

**HARD COPY**



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

**ADMINISTRATIVE PROCEEDING  
File No. 3-16876**

**In the Matter of**

**EFIM AKSANOV,**

**Respondent.**

**THE DIVISION OF ENFORCEMENT'S  
REPLY MEMORANDUM OF LAW IN SUPPORT OF ITS  
MOTION FOR SUMMARY DISPOSITION AGAINST EFIM AKSANOV**

On December 11, 2015, the Division of Enforcement submitted a motion for summary disposition pursuant to Rule 250 of the Securities and Exchange Commission's Rules of Practice, 17 C.F.R. § 201.250, and simultaneously served the motion papers upon Respondent Efim Aksanov. Through the motion, the Division seeks an Order barring Aksanov from participating in an offering of penny stock, pursuant to Section 15(b)(6)(A)(ii) of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C. § 78o(b)(6)(A)(ii), in light of his conviction, based on his guilty plea, for conspiracy to commit securities fraud in *United States v. Aksanov*, S2 13 Cr. 410-NRB-5 (S.D.N.Y. Mar. 31, 2015).

According to the briefing schedule established at the prehearing conference, Aksanov's opposition to the motion was due last Friday January 8, 2016. Aksanov has not submitted any opposition to the motion.<sup>1</sup> And, although he claimed to have sent an answer to the order instituting proceedings, no answer has been received. Consequently, the motion for summary disposition is

---

<sup>1</sup> The Secretary's Office has confirmed that it neither received an answer to the order instituting proceedings nor an opposition to the Division's motion for summary disposition.

unopposed. For that reason, and for the reasons set forth in the Division's opening brief, the Court should grant the motion and bar Aksanov from participating in an offering of penny stock.

Dated: New York, New York  
January 12, 2016

Respectfully submitted,



---

Paul G. Gizzi  
Rhonda L. Jung  
Division of Enforcement  
Securities and Exchange Commission  
New York Regional Office  
200 Vesey Street, Suite 400  
New York, NY 10281  
(212) 336-0077 (Gizzi)  
Email: [gizzip@sec.gov](mailto:gizzip@sec.gov)  
(212) 336-0479 (Jung)  
Email: [jungr@sec.gov](mailto:jungr@sec.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that on January 12, 2016, I caused the original and three copies of the foregoing reply memorandum of law to be filed by UPS and email with:

Brent J. Fields  
Secretary  
Securities and Exchange Commission  
100 F Street NE, Mail Stop 1090  
Washington, DC 20549

I further certify that I caused to be served a copy of the foregoing via UPS upon:

Efim Aksanov

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
Pensacola, Florida [REDACTED]

I further certify that I caused a courtesy copy of the foregoing to be provided by UPS and email to:

The Honorable Cameron Elliot  
Administrative Law Judge  
Securities and Exchange Commission  
100 F Street NE, Mail Stop 2582  
Washington, DC 20549

  
Rhonda Jung