

U.S. SECURITIES AND EXCHANGE COMMISSION

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Matter of

CHRISTOPHER M. GIBSON,

A.P. No. 3-17184

Respondent.

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**RESPONDENT'S MOTION FOR PROTECTIVE ORDER**

The Respondent Christopher Gibson ("Respondent"), by and through his undersigned counsel, pursuant to Rules 322 and 630(c) of the Commission's Rules of Practice<sup>1</sup>, hereby files Respondent's Motion for Protective Order to limit disclosure to the public or parties other than the Division of the information submitted on Form D-A and its required attachments.

The Form D-A and attachments present evidence of Respondent's inability to pay monetary sanctions. As such, the evidence includes detailed financial information on Respondent's assets, liabilities, income and expenses. The financial information is highly confidential and contains personally identifiable information, which would result in substantial harm if released to the public. There is no benefit to the public if it were permitted to be publicly disclosed, and the Division will still receive copies of the financial disclosure statement for their consideration. Respondent believes that the harm for disclosure would greatly outweigh any potential benefit. *See* Rule 322(b) ("A motion for a protective order shall be granted only upon a finding that the harm resulting from disclosure would outweigh the benefits of disclosure.").

The Respondent seeks to keep the following confidential and non-public:

- 1) Form D-A (sworn financial disclosure statement).

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<sup>1</sup> 17 C.F.R. §§ 201.322, 201.630.

- 2) Net worth documents and footnotes for years 2011-2019, attached to Form D-A as Attachments 1-6.
- 3) Screenshots of accounts from Bank of America Checking, Fidelity, Capital One Credit Card, and Bank of America Business Credit Card, attached to Form D-A as Attachments 7-10.
- 4) Income/Payments and Expenses/Disbursement document and footnotes, attached to Form D-A as Attachments 11-12.
- 5) Financial Statements for 2016, attached to Form D-A as Attachments 13.
- 6) James Hull Demand Note Chattel Paper, attached to Form D-A as Attachment 15.
- 7) Tax Returns for 2011-2012 and 2018, attached to Form D-A as Attachments 16-17 and 23.

WHEREFORE, the Respondent respectfully request the entry of a Protective Order preventing the release of Respondent's financial disclosure statement and its attachments to the public.

Dated: September 13, 2019

Respectfully submitted,

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### **Certificate of Service and Filing**

Pursuant to Rule 150(c)(2), I certify that on September 13, 2019, I caused the foregoing to be sent: **(1) By Facsimile** transmission and by **FedEx (original and 3 copies)** directed to the Office of the Secretary, Securities and Exchange Commission, 100 F Street NE, Washington DC 20549-1090, with a copy by **email** to [apfilings@sec.gov](mailto:apfilings@sec.gov). **(2) By email** to the Honorable James E. Grimes, Administrative Law Judge, Securities and Exchange Commission, at [alj@sec.gov](mailto:alj@sec.gov). **(3) By email** to Gregory R. Bockin and Nicholas C. Margida, Securities and Exchange Commission, at [bocking@sec.gov](mailto:bocking@sec.gov) and [margidan@sec.gov](mailto:margidan@sec.gov).

/s/ Thomas A. Ferrigno