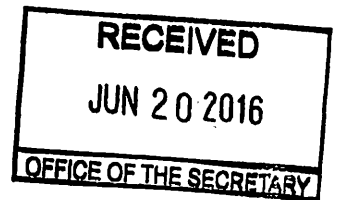


Paul White, [REDACTED]  
[REDACTED] - [REDACTED]  
P.O. Box 2002  
Dannemora, NY [REDACTED]



Honorable James E. Grimes  
Administrative Law Judge  
U.S. S.E.C.  
100 F. Street, N.E.  
Washington, DC 20549-2557

Re: File No. 3-17210: Violations, pursuant to both the  
Constitution of the United States of America and  
the New York State Constitution

June 8, 2016

Dear Honorable Judge Grimes,

I, Respondent, have discussed in previous communications, violations of Respondent's inalienable rights, pursuant to "Due Process", protected by both the Constitution of the United States of America and the New York State Constitution. In Respondent's opinion, there appears to be a continued course of misconduct in the case at bar. In fact, to support yet another Due Process Right violation, today, Respondent received "DIVISION OF ENFORCEMENT'S MEMORANDUM OF LAW IN OPPOSITION TO RESPONDENT'S SECOND MOTION FOR MORE DEFINITE STATEMENT" dated June 7, 2016.

In the MEMORANDUM, Alexander Janghorbani Esq. ("JANGHORBANI") states:

"These motions [Respondent's Motions for More Definite Statement] are dated May 18 and 19, 2016, but postmarked May 25, 2016. (See Resp. Br. at 36 (Envelope showing post-marked date)). The undersigned [JANGHORBANI] received these documents on June 1, 2016."

"On May 26, 2016, the Court denied Respondent's first motion for a more definite statement."

"On June 6, 2016, the Court denied Respondent's request to issue subpoenas."

To date, Respondent has not received a copy of the "Division's" "Resp. Br. at 36 (envelope showing post-marked date)" as referenced in JANGANGHORBANI'S MEMORANDUM in non-conformity to 17 C.F.R. §201.150(a) which states:

"In every proceeding as defined in Rule 101(a), each paper, including each notice of appearance, written motion, brief, or other written communication, shall be served upon each party in the proceeding in accordance with the provisions of this rule"

Although "exhibits" to motions, responses etc. are not specifically listed in Rule 150(a), it is logical, which Respondent believes the United States Court of Appeals, Second Circuit would also agree, that a party must serve a copy of all papers on all other parties, specifically and most importantly, their opposition. Therefore, Respondent respectfully submits that the Honorable Court should not consider Plaintiff's "Resp. Br." and rule in Respondent's favor accordingly as unopposed by his adversary. In addition, Respondent has not received a copy of "the Court's May 26, 2016" and "June 6, 2016" decisions as referenced in JANGHORBANI'S MEMORANDUM dated June 7, 2016. Respondent respectfully requests that the Honorable Court furnish him with a copy of the Court's decisions described above, in conformance of 17 C.F.R. §201.140 and §150. Respondent's Due Process Rights are being compromised, irreparably prejudicing his defense, by the Court's failure to furnish him with a copy of its decisions, wherefrom an appeal may be taken, pursuant to 17 C.F.R. §201.400 and §410. Respondent also finds it extremely interesting that many of the "Rules" contain the following language:

"In considering all motions or requests pursuant to paragraph (a) [Extension of Time] or (b) [Considerations in Determining Whether to Extend Time] of this rule, the Commission or the hearing officer should adhere to a policy of strongly disfavoring such requests ..." (Rule 161(b)(1))

**"Petitions by parties for interlocutory review are disfavored"(Rule 400(a))**

Respondent respectfully submits to the Honorable Court, if it seeks to be prosecutor, judge, jury and executioner having developed a pre-determined bias, in the case at bar, against Respondent, he respectfully requests that the Honorable Court not waste any more time or effort that may be expended by Plaintiff or Respondent, in the case at bar, and simply, if the Court wishes, issue its pre-meditated ruling that has been pre-determined before Respondent can properly defend his position and, thereby, violating his Constitutionally protected Due Process Rights. Throughout my 58 years of life, I have experienced similar situations and they always seem to end up in the same place, which, in the case at bar, will be the United States Court of Appeals, Second Circuit, after the SEC "rubber stamps" the Administrative Law Judge's decision, which is obvious to predict will be adverse to the Respondent.

Based upon information and Respondent's research, it must be near impossible for an employee, such as yourself, to remain neutral and detached, when you are working for your employer, the S.E.C., as well as possibly making adverse rulings (if this ever occurs) against your employer. In addition, if you have not had the "pleasure" of attending law school, studying for the bar exam, and practiced in the legal profession, the normal and customary pleadings procedure is as follows:

1. Petitioner submits pleading (i.e. Motion etc.)
2. Respondent is afforded a reasonable time to respond to Petitioner's pleading.
3. Petitioner is afforded a reasonable time to reply to Respondent's Opposition to Petitioner's pleading.

4. Court makes decision after considering both sides of the pleading argument.

This is known by the common term, "Due Process", and is Constitutionally protected, even if the Plaintiff is the United States Government, having sovereign immunity. Your Honor, if you are not an attorney and, thereby, not bound by Cannon's Code of Professional Responsibility or the New York State Code of Professional Conduct (Obviously there is no SEC Code of Judicial Conduct), such as my adversary, JANGHOBANI, you do not have to be concerned with disbarment only ridicule by your employer peers and "colleagues", if the Second Circuit overturns your Judicial Decision(s).

Respondent believes that our forefathers, framers of our Constitutions, would be appalled by the prejudicial biased "Administrative Proceeding" that Respondent has experienced, thus far, in violation of his Constitutional protected Due Process Rights. Our forefathers attempted to eliminate or reduce Governmental prejudice by instituting the "separation of powers" in our Constitutions. That failing, they framed the Second Amendment to protect, us citizens, against Governmental tyranny. Grounded upon Respondent's limited ability to do legal research, due to my incarceration for a crime that I truly did not commit, as previously discussed in several pleadings, it appears that the United States District Court, Southern District of New York, are beginning to understand biased S.E.C.'s Administrative Proceedings. If the Honorable Court seeks to discover the basis for Respondent's previous comment, the Court may read the dictum in Gupta v. SEC, 796 F.Supp.2d 503 (U.S.D.C. S.D. [NY] 2011.

In conclusion, the Respondent is trying as hard as he possibly can to both expedite the PROCEEDING as well as adequately and effectively answer Plaintiff's Order Instituting Proceedings. To illustrate an analogy to respondent's situation, imagine your law clerk working a full time job, approximately 40 hours per week,

as Respondent is forced to do and, thereafter, be permitted to only work approximately one(1) hour per week (i.e. Prison Law Library Time) to do the work you require from him/her. Therefore, Respondent is forced to respectfully request extensions of time to respond which should not be denied by the Honorable Court because it constructively violates a Prisoner's Due Process and Equal Protection Rights to "Access to the Courts" protected by the Sixth and Fourteenth Amendments of the Constitution of the United States of America and the New York State Constitution.

Dated: June 8, 2016  
Dannemora, NY



Paul White, [REDACTED]  
Respondent Pro Se  
[REDACTED]  
[REDACTED]  
Dannemora, NY [REDACTED]

cc: Brent Fields, Secretary  
Alexander Janghobani Esq.