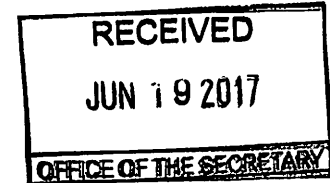


UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION



Administrative Proceeding

File No. 3-17210

Date: June 9, 2017

-----X

In the matter of

PAUL LEON WHITE II,

Respondent.

-----X

**RESPONDENT'S REPLY TO THE DIVISION'S RESPONDENT'S MOTION FOR  
RECONSIDERATION AND TO EXTEND TIME TO RE-FILE BRIEF**

Paul Leon White II, Respondent, respectfully submits this Reply to The Division's Response to Respondent's Motion For Reconsideration And To Extend Time To Re-File His Brief ("RESPONSE"), dated June 7, 2017, that was received by Respondent on June 9, 2017.

**RELEVANT PROCEDURAL HISTORY**

In the RESPONSE, the Securities and Exchange Commission's Division of Enforcement ("SEC") erroneously stated:

"Respondent is serving a term of twenty-one to sixty-one years' imprisonment after his criminal conviction on several counts of grand larceny and scheme to defraud."

In truth, Respondent's sentence was statutorily reduced to ten to twenty years, pursuant to New York Penal Law section 70.30.

Presently, Respondent is awaiting re-schedule of a hearing, based upon actual innocence, and thereby, Respondent should be released from prison shortly, due to the fact, that Respondent's conviction was unconstitutionally obtained as well as Respondent now possess unquestionable exonerating evidentiary proof, valid property deeds, which is explained in detail in Respondent's Brief ("BRIEF"), that is currently in the Honorable Court's possession.

**COMMISSION SHOULD GRANT RESPONDENT'S MOTION FOR RECONSIDERATION**

Due to the fact, that Respondent is being constructively denied Access to the Courts, and thus, violating Respondent's rights, pursuant to the Due Process Clauses in both the Constitution of the United States and the New York Constitution, Respondent requires excess time, at least seven(7) weeks to re-write the BRIEF, as Ordered by the Court, commencing from the date, Respondent receives the Court's Decision on Respondent's Motion for Reconsideration ("RECONSIDERATION MOTION"), due to the fact, that Respondent is only being provided approximately four(4) sheets of plain white 8 1/2" X 11" paper ("PAPER") per request, when Respondent is permitted to attend the [REDACTED] [REDACTED] [REDACTED] Law Library. As previously discussed in the RECONSIDERATION MOTION, CCF is violating both Federal Law, pursuant to the United States Supreme Court's decision in Bounds v. Smith, 430 U.S. 817, 97 S.Ct. 1491 (U.S.S.C. [DC] 1977) and its progeny, as well as CCF further violating New York Administrative Law, pursuant to the New York Department of Corrections and Community Services ("DOCCS") Directive No. 4498(III)(b). Therefore, the Respondent must be afforded sufficient time to adequately and effectively re-write the BRIEF, or preferably, accept the BRIEF "as is".

As the Honorable Court may glean from the form and content of the BRIEF, Respondent expects the Court to issue an unfavorable decision, against Respondent, who will in turn proceed on Appeal to the United States Court of Appeals, Second Circuit. In fact, one of Respondent's the major arguments, in the BRIEF, is that, the Administrative Law Judge, James E. Grimes, an inferior officer, was never properly appointed by the President or Head of a Governmental Department (i.e. SEC is an Agency), in violation of the "Appointment's Clause, pursuant to the Second Amendment of the Federal Constitution. Presently, there are split decisions, in the United States Courts of Appeals, Second Circuit, ruled in favor of Respondent's argument and the DC Circuit ruled against. Therefore, this particular issue is ripe to be heard by the United States Supreme Court.

Truthfully, no matter what Decision the Honorable Court issues, Respondent will appeal to the Second Circuit, favorable or unfavorable, such that the People of the United States may have a definitive ruling on this important Constitutional subject matter as well as the Respondent's "Separation of Powers" argument, which also requires judicial interpretation, by the Court of Appeals, and hopefully, the United States Supreme Court.

**SEC CONGEDES, THAT IF THE COURT DOES NOT GRANT  
RESPONDENT'S RECONSIDERATION MOTION, THAT THE COURT SHOULD GRANT A  
SEVEN WEEK EXTENSION OF TIME FOR RESPONDENT TO RE-FILE BRIEF**

Due to the fact, that the SEC's attorney, Preethi Krishnamurthy will be on a "long scheduled family vacation", coupled with the fact, that the SEC will be forced to respond to a similar or identical BRIEF, when Respondent appeals the Courts Decision to the Second Circuit, the Honorable Court should consider allowing the Respondent to utilize the pre-existing BRIEF and permit attorney Krishnamurthy as much time as he requires to adequately and effectively respond to the BRIEF, in order for the Respondent's Constitutional arguments to be fully addressed by the Commission, and thereafter, by the United States. Court of Appeals, Second Circuit.

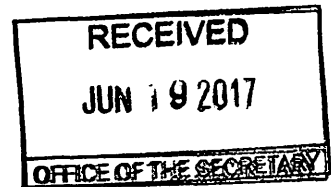
**Dated: June 9, 2017  
Dannemora, NY**



**Paul Leon White II, [REDACTED]  
respondent. Pro [REDACTED]**

**P.O. Box 2002  
Dannemora, NY [REDACTED]**

UNITED STATE OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION



Administrative Proceeding  
File No. 3-17210  
June 9, 2017

-----X  
In the Matter of  
PAUL LEON WHITE II,  
Respondent.

-----X  
CERTIFICATE OF SERVICE

I, Paul Leon White II, Respondent, proceeding Pro Se, hereby certify, that on June 9, 2017, I served the persons listed below, the Respondent's Reply To The Division's Response to Respondent's Motion For Reconsideration And To Extend Time To Re-File Brief ("REPLY"), by depositing an original or true copy of the REPLY in individual wrappers addressed to the persons below and attaching an AUTHORIZED ADVANCED REQUEST thereon, for the [REDACTED] [REDACTED] [REDACTED] Correspondence Department to affix sufficient United States First Class Mail postage thereon and depositing same into a mail receptacle at CCF.


The wrappers were addressed to the following persons:

Brent Fields, Secretary  
Office of Secretary  
U.S. S.E.C.  
100 F. Street, N.E.  
Washington, DC 20549-2557  
(Original & one copy)

Preethi Krishnamurthy Esq.  
U.S. S.E.C.  
200 Vesey Street, Suite 400  
New York, NY 10281-1022  
(one copy)

Dated: June 9, 2017

Danmore, NY

  
\_\_\_\_\_  
Paul Leon White II, Respondent