

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



**ADMINISTRATIVE PROCEEDING**  
**File No. 3-17693**

**In the Matter of**

**SEAN P. FINN and**  
**M. DWYER LLC,**

**Respondents.**

**DIVISION OF ENFORCEMENT'S REPLY**  
**TO RESPONDENT'S MAY 2019 FILING**

On September 27, 2019, the ALJ issued an order (the "Order") permitting Respondent Sean P. Finn to respond to the Division of Enforcement's motion for summary disposition by November 15, 2019. Division counsel promptly served a copy of the Order on Finn by UPS. The Division has not received any response from Finn and has confirmed with the ALJ's office that it has not received Finn's response either.

The Order also permitted the Division to respond to Finn's May 2019 response (the "Response") if Finn did not submit a new response by November 15, 2019. Finn's substantive opposition to the motion for summary disposition is found in a single sentence of his Response. He claims that he objects to the "unfounded summations, and assemblage of evidence, contained in the 'Motion of Summary Disposition' in its entirety." Response, p. 2. The Division replies that its motion for summary disposition complies with all applicable Rules of Practice and adequately supports, with citations to the record and applicable case law, the Division's request for summary disposition. The Division therefore respectfully requests that the ALJ enter a new initial decision of default on the grounds that Respondents still have not filed an answer, a response to the ALJ's order to show cause, or a meritorious response to the Division's motion for summary disposition.

Dated: December 4, 2019

Respectfully submitted,

/s/ Melissa Armstrong \_\_\_\_\_

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COUNSEL FOR  
DIVISION OF ENFORCEMENT

CERTIFICATE OF SERVICE

I certify that on December 4, 2019, I served a true and correct copy of the foregoing document on Respondents by mailing it by UPS to Respondent Sean P. Finn at the following address:

Sean P. Finn



Pahrump, NV 89060

/s/ Melissa Armstrong  
Melissa Armstrong