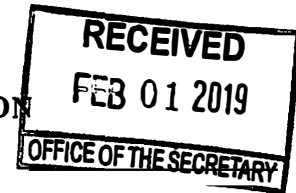


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING
File No. 3-18481

In the Matter of

ANGELA RUBBO
BECKCOM MONACO,

Respondent.

DIVISION OF ENFORCEMENT'S
REPLY IN SUPPORT OF MOTION
FOR SUMMARY DISPOSITION

The Division of Enforcement (“Division”) submits this Reply in support of its Motion for Summary Disposition against Respondent Angela Rubbo Beckcom Monaco (“Respondent”), and respectfully shows the following:

I. Respondent Fails to Raise a Genuine Issue of Material Fact

On January 28, 2019, the Division was provided with a copy of Respondent’s handwritten letter dated January 10, 2019. To the extent the Law Judge accepts Respondent’s letter as her response brief, the Division submits that nothing contained in the letter raises a genuine issue of material fact in this matter. The Commission’s May 15, 2018 Order Instituting Proceedings (“OIP”), brought pursuant to Section 15(b) of the Exchange Act, alleges among other things, that on May 1, 2018, Respondent pleaded guilty to one count of conspiracy to commit mail and wire fraud in violation of 18 U.S.C. § 1349, and one count of engaging in a monetary transaction in property derived from specified unlawful activity in violation of 18 U.S.C. § 1957 before the United States District Court for the District of Colorado in *United States v. Angela Monaco*,

Criminal Case No. 17-cr-417-RBJ. The indictment against Respondent and her plea agreement establish among other things, the following: between 2012 to the date of the plea, Respondent, her siblings and another individual each acted as part of a broader scheme to (1) use the mails to defraud multiple investors of millions of dollars, (2) commit securities fraud; and (3) engage in money laundering. Exhibit 2 to Motion for Summary Disposition, Plea Agr., p.10; Exhibit 1 to Motion for Summary Disposition, Indictment.

Nothing contained in Respondent's January 10, 2019 submission disputes the Indictment or the terms of her plea agreement. Additionally, when the conviction results from a guilty plea, the respondent is bound by the facts admitted in the plea agreement. *See Don Warner Reinhard*, 100 S.E.C. Docket 731, 2011 WL 121451, *7 (Jan. 14, 2011); *Gary M. Kornman*, Securities Exchange Act Release No. 59403 (Feb. 13, 2009), 95 SEC Docket 14246, 14257 (criminal conviction based on guilty plea precludes litigation of issues in Commission proceedings).

II. Summary Disposition is Appropriate

The undisputed facts determined in Respondent's criminal case entitle the Division to summary disposition as a matter of law. As set forth in the Division's Motion for Summary Disposition, each of the requirements of Section 15(b)(6)(A)—timely issuance of the OIP, conviction under a qualifying statute, and misconduct committed while Respondent was associated with a broker or dealer—is satisfied here. Respondent does not raise any genuine issues of fact to challenge the Division's satisfaction of these elements.

III. Industry and Penny Stock Bars are in the Public Interest and Appropriate Sanctions

Respondent's January 10, 2019 submission further illustrates why administrative sanctions are appropriate here. Despite the egregiousness of Respondent's actions, as admitted in her plea agreement, Respondent fails to recognize the wrongful nature of her conduct. Instead, the

Respondent claims she is “in this situation” because she trusted her family. See Respondent’s January 10, 2019 letter. Further, “[a]bsent ‘extraordinary mitigating circumstances,’ an individual who has been convicted cannot be permitted to remain in the securities industry.” *Frederick W. Wall*, Exchange Act Release No. 52467 at 8 (Sept. 19, 2005) (citing *John S. Brownson*, 77 SEC Docket 3636, 3640 (July 3, 2002)).

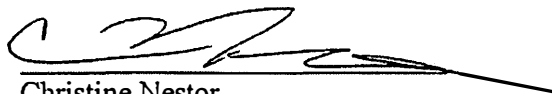
Unless she is barred from the securities industry Respondent will have the chance to again harm investors. Here, no genuine issues of material fact exist and the Law Judge should bar Respondent from the securities industry in an effort to protect the investing public from future harm.

IV. Conclusion

For the reasons discussed above and in the Division’s Motion for Summary Disposition, the Division asks the Law Judge to sanction Respondent by issuing a penny stock bar and barring her from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent or NRSRO.

January 31, 2019

Respectfully submitted,



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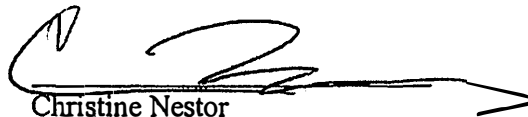
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CERTIFICATE OF SERVICE

I hereby certify that an original and three copies of the foregoing were filed with the Securities and Exchange Commission, Office of the Secretary, 100 F Street, N.E., Washington, D.C. 20549-9303, and that a true and correct copy of the foregoing has been served as indicated below, on this 31st day of January, 2019, on the following persons entitled to notice:

The Honorable Brenda P. Murray
Chief Administrative Law Judge
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549
Via E-mail

Ms. Angela Rubbo Beckcom Monaco
Register Nbr [REDACTED]
[REDACTED]
P.O. Box [REDACTED]
Sunterville, FL [REDACTED]
Via Certified Mail


Christine Nestor
Senior Trial Counsel