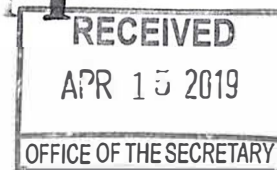


COPY HARD COPY

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING
File No. 3-18534

In the Matter of

JASON A. HALEK,

Respondent.

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

The Division of Enforcement ("Division") submits this Reply in Support of Its Motion for Summary Disposition (the "Motion") and respectfully shows as follows:

On March 28, 2019, Respondent Jason A. Halek ("Halek") emailed a brief in opposition to the Motion (the "Opposition") to the undersigned and to the ALJ@sec.gov mailbox. Halek has not informed the Division whether he filed the Opposition with the Office of the Secretary.

The Opposition does not dispute that: (1) the 2017 Judgment¹ enjoined Halek from engaging in conduct in connection with the purchase or sale of securities; (2) the 2014 Complaint, which allegations must be accepted as true, alleged that Halek acted as an unregistered broker in connection with the offer and sale of the securities at issue; and (3) the allegations in the 2014 Complaint and the other evidence submitted with the Motion support the imposition of a broker-dealer bar against Halek under the factors set forth in *Steadman v. SEC*, 603 F.2d 1126, 1140 (5th Cir. 1979), *aff'd on other grounds*, 450 U.S. 91 (1981). The Opposition also does not include any evidence or contest any of the Division's evidence.

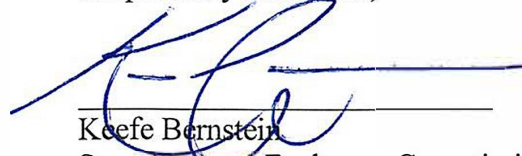
¹ Capitalized terms not defined herein have the same meanings as in the Motion.

Instead, the Opposition makes several baseless, inaccurate, and unsubstantiated allegations relating to Halek's prior counsel, Ralph Janvey. Mr. Janvey was Halek's counsel in the earlier 2010 Lawsuit. Further, Mr. Janvey does not work for the Commission and is not its agent; he is the Court-appointed receiver in the unrelated *SEC v. Stanford International Bank, LTD., et al.*, 3:09-cv-00298 (N.D. Tex. Dallas Division) litigation. The fact that Halek's counsel in the earlier 2010 Lawsuit is a Court-appointed receiver in the unrelated Stanford litigation is not relevant to the Motion and does not raise a genuine issue with regard to any material fact.

For these reasons, and the reasons set forth in the Motion, there is no genuine issue with regard to any material fact and the Division is entitled to an order of summary disposition permanently barring Halek from association with a broker or dealer as a matter of law.

Dated: April 12, 2019

Respectfully submitted,



Keefe Bernstein
Securities and Exchange Commission
Fort Worth Regional Office
Burnett Plaza, Suite 1900
801 Cherry Street, Unit 18
Fort Worth, Texas 76102
(817) 900-2607
(817) 978-4927 (facsimile)
Bernsteink@sec.gov

Counsel for Division of Enforcement

Service List

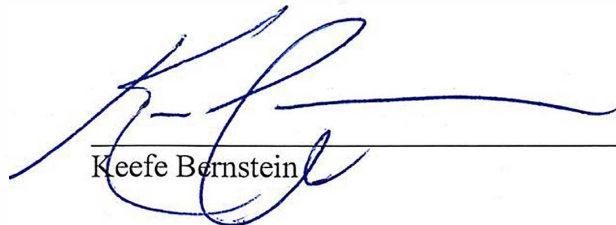
Pursuant to Rule 150 of the Commission's Rules of Practice, I certify that on April 12, 2019, a true and correct copy of the foregoing was served to the following:

Via Email and UPS

Honorable Brenda P. Murray
Chief Administrative Law Judge
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-2557
ALJ@sec.gov

Via Email, U.S. Mail and UPS

Mr. Jason A. Halek
[REDACTED]
Southlake, TX [REDACTED]
[REDACTED]*gmail.com*



Keefe Bernstein