

OF AMERICA
the
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT ADVISERS ACT OF 1940
Release No. 5424/January 15, 2020

ADMINISTRATIVE PROCEEDING
File No. 3-19635



In the Matter of

STEPHEN CONDON PETERS,

Respondent.

ANSWER
(pro se)

Respondent Stephen C. Peters ("Peters") answer the allegations as follows:

I.

I have appealed my conviction to the United States Court of Appeals for the Fourth Circuit. I dispute that there is "no genuine material issue regarding Peters' criminal conviction that exists" hence the appeal. I deny that a Summary Disposition of this matter is appropriate until I have completed the appeal of my conviction. I request that this proceeding be stayed until the completion of my appeal and any subsequent proceedings in the trial court that may result from the appeal.

II.

Admit that the records appear to be public documents related to Peters' criminal trial, but deny that these (5) public documents are undisputed. I have appealed my conviction to the United States Court of Appeals for the Fourth Circuit and oppose the findings of fact. I request that this proceeding be stayed until the completion of my appeal and any subsequent proceedings in the trial court that may result from the appeal.

III.

Admit that a pre-hearing conference call with Division Representatives occurred on February 6th, 2020.

Admit that Division's Counsel, Edward G. Sullivan ("Division's Counsel") provided his intentions for Summary Disposition as well as timing regarding administrative proceedings during this pre-hearing conference call on February 6th, 2020. During pre-hearing conference call, I advised Division's Counsel that I was confined in the FCC - Petersburg Medium Facility in Petersburg, Virginia. Additionally, I advised that I would be representing myself in this matter. Lastly, I committed to putting forth a "best effort" to meeting all deadlines and standards of the Division, but asked for "grace" as it relates to deadlines under my current circumstances.

In all legal cases cited by Division's Counsel, none of the cases were granted a Summary Disposition while the defendant was in the midst of an appeal. None of the legal cases referenced by Division's Counsel had defendants that were appealing their conviction at the time of these rulings. I have appealed my conviction to the United States Court of Appeals for the Fourth Circuit. I request that this proceeding be stayed until the completion of my appeal and any subsequent proceedings in the trial court that may result from the appeal.

IV.

Division's Counsel has made preposterous and inconsistent claims for immediate action on the basis of potential, future and substantial harm to investors as well as the need to apply "standards" in the "best interest of the public."

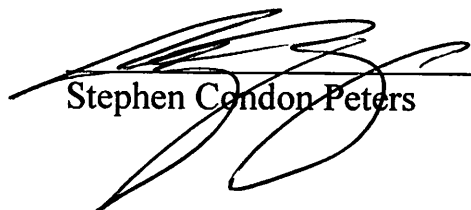
I am serving a 480 month prison sentence and there is no potential harm to investors while I am incarcerated and appealing my conviction to the United States Court of Appeals for the Fourth Circuit. To claim that I represent a "potential, future and substantial harm to investors" is preposterous.

Furthermore, the "various IA firm employees" who testified at Peters' criminal trial, under oath, testified that they committed Investment Advisor Fraud, Fraud in the Sale of Securities, Wire Fraud, Making and Using False Documents, Falsifying or Concealing Records, Corrupting to Influence a Federal Agency, and Aggravated Identify Theft. If immediate action, as Division Counsel is suggesting, is required

to ensure that "standards" are applied for the "best interest of the public" then these Investment Advisors would be facing swift administrative proceedings. The inaction in applying the "standards" in the "best interest of the public" is proof that the need for an immediate Summary Disposition is inconsistent with how Division has handled other matters relevant to this case.

I maintain my innocence. Maintaining innocence should never be considered an action of a defiant individual, but an action from someone who desires and believes in due process. Respectfully, I request that this proceeding be stayed until the completion of my appeal and any subsequent proceedings in the trial court that may result from my appeal.

Signed the 12th day of March, 2020.



Stephen Condon Peters

CERTIFICATE OF SERVICE

On March 12, 2020, I mailed an original plus three copies of this Answer to:

Office of the Secretary
US Securities and Exchange Commission
100 F Street NE, Mail Stop 1090
Washington, DC 20549

And mailed a copy to:

Edward G. Sullivan
Atlanta Regional Office
Securities and Exchange Commission
950 East Paces Ferry Road, Suite 900
Atlanta, GA 30326



Stephen Condon Peters

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

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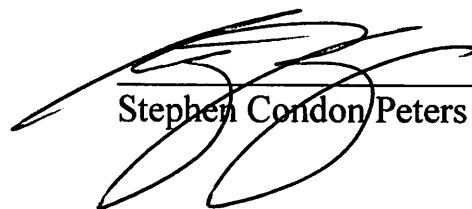
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Signed the 12th day of March, 2020.



Stephen Condon Peters


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Office of the Secretary
US Securities and Exchange Commission
100 F Street NE, Mail Stop 1090
Washington, DC 20549

And mailed a copy to:

Edward G. Sullivan
Atlanta Regional Office
Securities and Exchange Commission
950 East Paces Ferry Road, Suite 900
Atlanta, GA 30326



Stephen Condon Peters