

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT ADVISERS ACT OF 1940
Release No. 6130

ADMINISTRATIVE PROCEEDING
File No. 3-21097

In the Matter of

GRENDA GROUP, LLC,

Respondent.

INVESTMENT ADVISERS ACT OF 1940
Release No. 6131

ADMINISTRATIVE PROCEEDING
File No. 3-21098

In the Matter of

GREGORY M. GRENDA,

Respondent.

BRIEF OF THE DIVISION OF ENFORCEMENT

The Division of Enforcement (“Division”) respectfully submits this brief pursuant to the *Order Requesting Briefs* dated March 10, 2023, which seeks “the view of the parties on whether it is appropriate to consolidate” the *Matter of Grenda Group, LLC* and *Matter of Gregory M. Grenda* proceedings.

The Division’s position is that consolidation of the two proceedings is appropriate and consistent with Rule of Practice 201(a), which permits the Commission to consolidate “proceedings involving a common question of law or fact.” 17 C.F.R. § 201.201(a). The orders

instituting proceedings were instituted under the Investment Advisers Act of 1940, arise from final judgments entered on the same day in the same underlying proceeding, following jury verdicts in the same trial, and both matters require a determination of whether relief is in the public interest based on the same underlying conduct. In these circumstances, consolidation is appropriate. *See Matters of Jocelyn Murphy and Michael Sean Murphy*, Rel. No. 91797, 2021 WL 1835414, *1 (May 7, 2021) (granting Respondents' motion to consolidate two follow-on proceedings arising from the same underlying proceeding).

Dated: March 22, 2023

Respectfully submitted,

/s/ David Stoelting

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