

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-21345

<p>In the Matter of</p> <p>BERNARD M. PARKER,</p> <p>Respondent.</p>

**THE DIVISION OF ENFORCEMENT’S MOTION FOR ENTRY OF
AN ORDER OF DEFAULT AND THE IMPOSITION OF REMEDIAL
SANCTIONS AGAINST RESPONDENT BERNARD M. PARKER**

Pursuant to Rule 155(a) of the Securities and Exchange Commission’s Rules of Practice and the Commission’s Order to Show Cause dated July 31, 2024, the Division of Enforcement (the “Division”) respectfully moves for default and sanctions in the form of an order barring Respondent Bernard M. Parker (“Parker”) from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization, and from participating in any offering of a penny stock pursuant to Section 15(b)(6)(A)(iii) of the Securities Exchange Act of 1934 (“Exchange Act”) and Section 203(f) of the Investment Advisor’s Act of 1940.

As set forth in the accompanying brief, default is appropriate in this follow-on proceeding, after a Final Judgment in the action brought by the Commission against Parker in the United States District Court for the Western District of Pennsylvania for conducting an unregistered and fraudulent securities offering that raised more than \$1.2 million from at least twenty-two (22) investors.

On November 24, 2020, the District Court granted Plaintiff Securities and Exchange Commission's motion for summary judgment and made specific factual findings that Parker was liable for violating Sections 5(a), 5(c), and 17(a) of the Securities Act of 1933 ("Securities Act") [15 U.S.C. §§ 77e(a), 77e(c), 77q(a)] and Section 10(b) of the Securities Exchange Act of 1934 ("Exchange Act") and Rule 10b-5 thereunder [15 U.S.C. § 78j(b); 17 C.F.R. § 240.10b-5] and permanently enjoined Parker from future violations thereof. *SEC v. Parker*, Case No. 15-cv-1535 CB (W.D.PA. November 24, 2020) (*See also* Dkt. Nos. 33-35).

The Division made specific allegations in the Order Instituting Proceedings ("OIP") that mirror the allegations in the federal action for which Parker was found liable. Although Parker was personally served with the OIP on March 29, 2023, he has failed to appear, including after the Commission ordered him to show cause as to why a default should not be entered against him. Under Rule 155(a), the allegations in the OIP may be deemed true where, as here, a party has failed to defend himself. Thus, the only substantive issue for the Commission concerns what sanctions are appropriate against Parker. As shown in the accompanying brief, a full bar is in the public interest, and the Commission should order all available remedial sanctions.

September 6, 2024

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of September, 2024, I caused a true and correct copy of the foregoing Motion for Entry of An Order of Default and the Imposition of Remedial Sanctions Against Respondent Bernard M. Parker to be served upon the respondent by email at bernieparker@hotmail.com. In addition, a copy of same will be delivered via UPS, signature requested, to Parker at his last known address: [REDACTED]

[REDACTED].

[REDACTED]

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Before the
SECURITIES AND EXCHANGE COMMISSION

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File No. 3-21345

<p>In the Matter of</p> <p>BERNARD M. PARKER,</p> <p>Respondent.</p>

**THE DIVISION OF ENFORCEMENT’S BRIEF IN SUPPORT OF ITS
MOTION FOR DEFAULT AND REMEDIAL SANCTIONS
AGAINST RESPONDENT BERNARD M. PARKER**

Pursuant to Rule 155(a) of the Securities and Exchange Commission’s Rules of Practice and the Commission’s Order to Show Cause dated July 31, 2024, the Division of Enforcement (the “Division”) respectfully submits this brief in support of its motion for default and sanctions against Respondent Bernard M. Parker (“Parker”).

The Commission filed a complaint against Parker in the United States District Court for the Western District of Pennsylvania. *SEC v. Parker*, Case No. 15-cv-1535 CB (W.D.PA. November 24, 2020) (the “District Court Action”). On November 24, 2020, the district court granted the Commission’s motion for summary judgment and found Parker liable for violating Sections 5(a), 5(c), and 17(a) of the Securities Act of 1933 (“Securities Act”) [15 U.S.C. §§ 77e(a), 77e(c), 77q(a)], as well as Section 10(b) of the Securities Exchange Act of 1934 (“Exchange Act”) and Rule 10b-5 thereunder [15 U.S.C. § 78j(b); 17 C.F.R. § 240.10b-5]. The court entered a final judgment against Parker, which, among other things, made specific factual findings and permanently enjoined Parker from future violations of the above listed Sections.

See District Court Action, Dkt. Nos. 33-35. Parker was also charged with securities fraud (among other things), tried, and convicted by a jury in federal criminal proceedings arising out of the same misconduct.

In this follow-on proceeding, the Division made specific allegations as reflected in the Commission's Order Instituting Proceedings ("OIP") that Parker violated the same statutes and rules at issue in the District Court Action. *Bernard M. Parker*, Exchange Act Release No. 97166, 2023 WL 2582386 (Mar. 20, 2023).

Parker was personally served with a copy of the OIP on March 29, 2023. Although Parker was served and is aware of this proceeding, he has failed to appear, including after the Commission ordered him to show cause as to why a default should not be entered against him. Under Rule 155(a), default may be granted based on the allegations in the OIP, which may be deemed true where, as here, a party has failed to defend himself.

Thus, the only substantive issue for the Commission concerns which sanctions are appropriate against Parker. As detailed below, the facts here demonstrate that Parker's conduct warrants removal from the industry. Section 15(b)(6) of the Exchange Act and Section 203(f) of the Investment Advisers Act of 1940 ("Advisers Act") authorize the Commission to bar a person from the securities industry if such a bar is in the public interest and the person: (i) was associated with a broker or dealer (Section 15(b)(6)) or an investment adviser (Section 203(f)) at the time of the alleged misconduct; and (ii) was convicted within ten years of the commencement of the proceeding of, among other offenses, a felony involving the purchase or sale of a security or was enjoined from engaging in any conduct or practice in connection with the purchase or sale of a security. See, Exchange Act §§ 15(b)(4)(B)(i), 15(b)(4)(C), 15(b)(6); Advisers Act §§

203(e)(2)(A), 203(e)(4), 203(f). Exchange Act Section 15(b)(6) also authorizes a penny stock bar on these grounds.

BACKGROUND

A. The Commission Filed A Civil Action Against Parker and the Criminal Authorities Filed a Parallel Criminal Action

On November 23, 2015, the Commission filed the District Court Action. A copy of the complaint is attached as Exhibit 1. The Complaint alleged that from 2008 through 2014, Parker “conducted an unregistered and fraudulent offering of securities that raised more than \$1.2 million from at least 22 investors through Parker Financial Services (‘Parker Financial’), a company controlled by Parker and operated out of his home in Indiana, Pennsylvania.” Ex. 1, ¶ 1.

On the same day the Complaint was filed, the Court unsealed an Indictment in a parallel criminal action against Parker, charging him with one count of securities fraud, in violation of 15 U.S.C. §§ 78j(b), 78ff(a), and 17 C.F.R. § 240.10b-5, and one count of mail fraud, in violation of 18 U.S.C. § 1341. *United States v. Bernard M. Parker*, 15 CR 253 RBW, Dkt. No. 2 (the “Criminal Case”). A copy of the Indictment is attached as Exhibit 2. On February 9, 2016, a Superseding Indictment was filed which added four tax related counts. Criminal Case, Dkt. No. 24. A copy of the Superseding Indictment is attached as Exhibit 3. The fraud scheme described in the Criminal Case involves the same the misconduct detailed in the SEC’s Complaint.

On June 22, 2017, a jury found Parker guilty of all charges in the Superseding Indictment, and on October 16, 2017, he was sentenced to eighty-seven (87) months’ imprisonment. Criminal Case, Dkt. No. 98. A copy of the judgment is attached as Exhibit 4. The Court also ordered restitution of \$1,223,863.93, and imposed a \$600 special assessment.

On June 7, 2019, the United States Court of Appeals for the Third Circuit affirmed Parker's conviction and sentence. *United States v. Parker*, 776 F. App'x 756, 757 (3d Cir. 2019). A copy of that decision is attached as Exhibit 5.

On March 17, 2020, the SEC filed a motion for summary judgment. District Court Action, Dkt. Nos. 26-29. Parker, proceeding *pro se*, opposed the motion. *Id.* at Dkt. Nos. 30, 32. On November 24, 2020, the court granted the SEC's motion for summary judgment, and entered a final judgment, which enjoined Parker from future violations of Section 10(b) of the Exchange Act and Rule 10b-5 thereunder, and Sections 5 and 17(a) of the Securities Act. *Id.*, Dkt. Nos. 33, 34. Copies of the order and final judgment are attached as Exhibits 6 and 7.

B. The Commission Issued An OIP To Which Parker Has Not Responded

On March 20, 2023, the Commission issued an OIP, pursuant to Section 15(b) of the Exchange Act and Section 203(f) of the Adviser's Act. *Bernard M. Parker*, Exchange Act Release No. 97166, 2023 WL 2582386 (Mar. 20, 2023). The OIP contains detailed factual allegations, including:

[F]rom 2008 through 2014, Parker made material misrepresentations and omissions to investors when he told them he would pool their money and use it to invest in tax liens and pay them a specified interest rate using the profit earned from investments in tax liens. Parker solicited investments from his customers at Edward Jones and claimed to invest through his company, Parker Financial. Parker collected more than \$1.2 million from 2008 to 2013, and lied to his employer Edward Jones and failed to disclose the existence of Parker Financial. Parker misappropriated over \$1 million of investor money to pay his personal expenses, and the balance (approximately \$188,000) in interest payments to investors who did not "roll over" their interest into new investments.

OIP, ¶ 3.

The OIP further noted that on June 22, 2017, Parker was convicted of securities fraud and related charges in the Criminal Case and later sentenced to eighty-seven (87) months'

imprisonment. As noted in the OIP, the “criminal case concerned the same conduct at issue underlying the Commission’s Complaint.” OIP, ¶¶ 4-5.

The OIP further noted that on November 24, 2020, a final judgment was entered in the District Court Action against Parker, permanently enjoining him from future violations of the federal securities laws charged in that action. OIP, ¶ 2.

Parker was personally served with a copy of the OIP on March 29, 2023. A copy of the Certificate of Service is attached as Exhibit 8.

Over a year later, Parker had not responded to the OIP. On July 31, 2024, the Commission issued an Order to Show Cause, which ordered Parker to file any response no later than August 14, 2024. *Bernard M. Parker*, Exchange Act Release No. 100621, 2024 WL 3640010.

To date, Parker has not filed an answer or other response to the OIP or to the Order to Show Cause. Because Parker has defaulted, the facts set forth in the OIP may be taken as true for purposes of determining an appropriate remedy. *See* SEC Rule of Practice 155. Therefore, the Division now seeks a default judgment against Parker and an order granting remedial sanctions.

ARGUMENT

The Commission should enter a default against Parker because he failed to answer the OIP after being personally served and did not respond to the Commission’s Order to Show Cause. In addition, the Commission should grant the Division’s request to bar Parker from associating with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization bar, and from participating in any offering of a penny stock because all three statutory elements are satisfied:

Parker was associated with a broker-dealer and investment adviser at the time of the misconduct, the Court permanently enjoined him from all future violations of Section 10(b) of the Exchange Act and Rule 10b-5 thereunder, and Sections 5 and 17(a) of the Securities Act, and the requested bars are in the public interest.

A. The Commission Should Enter A Default Judgment

The Commission should enter a default judgment against Parker for failing to file a timely response to the OIP. A party to a proceeding “may be deemed to be in default and the Commission or hearing officer may determine the proceeding against that party upon consideration of the record, including the order instituting proceedings, the allegations of which may be deemed to be true, if that party fails . . . [t]o answer, to respond to a dispositive motion within the time provided, or otherwise to defend the proceeding.” Commission Rule of Practice 155(a)(2); *see, e.g., In re Barzilay*, Exchange Act Release No. 46536, 2002 WL 31116124, at *1, 2 (Sept. 24, 2002) (due to respondent’s failure to file a timely response to OIP, Commission accepted allegations in the OIP as true, granted default judgment, and found it “necessary and appropriate for the protection of investors” to bar Respondents from association with a broker or dealer pursuant to Section 15(b) of the Exchange Act). Here, the OIP contains detailed allegations of the unlawful conduct, Parker failed to respond to the OIP, and a default judgment is appropriate.

The Division served the OIP on Parker on March 29, 2023. *See*, Exhibit 8, Certificate of Service. Parker failed to answer or otherwise defend the proceeding, as required by Rules 155(a) and 220(f).

The Commission then issued an Order to Show Cause as to why a default should not be entered against Parker for his failure to respond. Parker did not file an answer or any other

response. As the Commission recognized in the Order to Show Cause, the failure to timely oppose is itself a basis for a default judgment. Rules of Practice 155(a)(2), 180(c), 17 C.F.R. §§ 201.155(a)(2), 201.180(c). *See, e.g., Barzilay*, 2002 WL 31116124, at *1 (granting default); *see also, In re McBarron Capital LLC*, Exchange Act Release No. 81789, 2017 WL 4350655, at *3-5 (Sep. 29, 2017) (finding respondent lacked good cause to reopen after defaulting because respondent had not filed an opening brief or responded to a motion to dismiss).

B. Remedial Sanctions Are Appropriate

The Commission should grant the Division's request for associational and penny stock bars against Parker.

Section 15(b)(6) of the Exchange Act and Section 203(f) of the Advisers Act authorize the Commission to bar a person from the securities industry if such a bar is in the public interest and the person (i) was associated with a broker or dealer (Section 15(b)(6)) or an investment adviser (Section 203(f)) at the time of the alleged misconduct and (ii) was convicted within ten years of the commencement of the proceeding of, among other offenses, a felony involving the purchase or sale of a security or was enjoined from engaging in any conduct or practice in connection with the purchase or sale of a security. *See* Exchange Act §§ 15(b)(4)(B)(i), 15(b)(4)(C), 15(b)(6); Advisers Act §§ 203(e)(2)(A), 203(e)(4), 203(f). Exchange Act Section 15(b)(6) also authorizes a penny stock bar on these grounds.

As noted above, the District Court found Parker liable for violating Section 10(b) of the Exchange Act and Rule 10b-5 thereunder, as well as Sections 5 and 17(a) of the Securities Act. Exhibits 6, 7. The court then permanently enjoined Parker from future violations of these provisions. *Id.*

In addition, as indicated in the OIP:

From April 2008 through 2014, Respondent was a registered representative associated with Edward Jones & Co., L.P. (“Edward Jones”), a dually-registered broker-dealer and investment adviser. For a portion of the time in which he engaged in the conduct underlying the indictment and complaint described below, Respondent was also a registered representative associated with broker-dealers registered with the Commission.

Therefore, Parker was associated with a dually registered broker-dealer and investment advisor at the time.

And on June 22, 2017, a jury in the Criminal Case convicted Parker of securities fraud, mail fraud, and three counts of tax related offenses. OIP, ¶ 4. The court then sentenced Parker to a lengthy term of incarceration as explained above. *Id.*, Exhibit 4. As noted in the OIP, the “criminal case concerned the same conduct at issue underlying the Commission’s Complaint.” OIP, ¶ 5.

Parker cannot challenge the District Court’s findings and its imposition of an injunction. “It is well established that the Commission does not permit a respondent to relitigate issues that were addressed in a previous civil proceeding against the respondent...” *In re Peter J. Eichler, Jr.*, Initial Dec. Rel. No. 1032, 2016 WL 4035559, at *2 (July 8, 2016) (collecting cases).

Just as the District Court recognized in enjoining Parker, a full bar is in the public interest here. In determining whether “industry and penny stock bars . . . are in the public interest,” the Commission,

consider[s], among other things, the egregiousness of the respondent’s actions, the isolated or recurrent nature of the infraction, the degree of scienter involved, the sincerity of the respondent’s assurances against future violations, the respondent’s recognition of the wrongful nature of his conduct, and the likelihood that the respondent’s occupation will present opportunities for future violations.

In re David R. Wulf, Exchange Act Release No. 77411, at 5-6, 2016 WL 1085661, *4 (Mar. 21, 2016), *vacated in part by* Exchange Act Release No. 86309, 2019 WL 2903943 (July 5, 2019) (vacating as to bars relating only to conduct prior to July 22, 2010); *SEC v. Desai*, 145 F. Supp.

3d 329, 337 (D.N.J. 2015), *aff'd*, 672 F. App'x 201 (3d Cir. 2016). Here, these factors weigh in favor of a complete industry ban.

Applying the above factors to the unique facts and circumstances of Parker's case, the requested relief is clearly supported. *Shawn K. Dicken*, Exchange Act Release No. 89526, 2020 WL 4678066, at *1 (Aug. 12, 2020); *Rapoport v. SEC*, 682 F.3d 98, 108 (D.C. Cir. 2012) (requiring the SEC to provide "some meaningful explanation for imposing sanctions.").

First, Parker's actions were egregious. Parker, a registered representative associated with Edward Jones, a dually-registered broker-dealer and investment adviser, solicited over \$1.2 million from his Edward Jones customers to invest in Parker Financial. OIP, ¶ 1, 3. Parker told those customers that he was going to pool their money and invest in tax liens, and then pay them a specified interest rate based on the profit earned. OIP, ¶ 3. Instead, Parker lied to both his employer, Edward Jones, and his customers, and misappropriated over \$1 million of investor money to pay his personal expenses. *Id.*

And these customers that Parker preyed on were not random, faceless strangers. As the evidence at trial in the Criminal Case showed, many of the victim-investors had known Parker for decades. The jury's verdict of guilty as to Count One, Securities Fraud, had a list of special interrogatories which listed sixteen (16) securities fraud victim-investors by name. A copy of the verdict sheet and special interrogatory, redacted to remove the signatures of the jurors, is attached hereto and marked as Exhibit 9. The jury found Parker committed securities fraud beyond a reasonable doubt as to twelve (12) of the sixteen (16) victim-investors. Ex. 9.

The first victim-investor listed was Mrs. Higginson, an eighty-year-old widow who testified at trial. An excerpt of Mrs. Higginson's trial testimony, redacted to remove her home address, is attached as Exhibit 10. Mrs. Higginson had known Parker for at least 50 years as

Parker lived down the street from the Higginson's as a kid and went to the same school as the Higginson's children. Ex. 10 at 3, 4. Very often during Parker's formative years, he would be at the Higginson's home, playing with the Higginson children, and swimming in the Higginson's pool. Ex. 10 at 4.

Parker began investing with Mr. Higginson early on in Parker's career, perhaps as early as the 1980s, an investing relationship that continued until Mr. Higginson's death in 2007. *Id.* at 4, 5. In 2008, after assisting Mrs. Higginson with the paperwork pertaining to the proceeds of Mr. Higginson's life insurance policy, Parker paid Mrs. Higginson a visit to solicit funds from her for his Parker Financial investment scheme, with Parker promising interest rates between 5.5% and 7.5%. *Id.* at 6-8, 10, 12. Based on Parker's misrepresentations, and in reliance on decades of trust, Mrs. Higginson invested thousands of dollars on five separate occasions. But Parker misappropriated her money for personal expenses. *Id.* at 9-12.

Another one of the victim-investors, Mr. Rado, special interrogatory question number 6 (Ex. 9), also had a long history with Mr. Parker. A copy of the transcript of Mr. Rado's trial testimony is attached as Exhibit 11. Mr. Rado began investing with Parker in 1999. Ex. 11 at 2. During one of Parker's visits to the Rado residence, he discussed the tax lien investment scheme, and promised Mr. Rado a 9% rate of return. *Id.* at 3-4. Persuaded by Parker's pitch, Mr. Rado invested \$10,000, money which Parker did not invest by purchasing tax liens, but instead spent on personal expenses. *Id.* at 4-5.

Mrs. Rado spoke at Parker's sentencing hearing, and a copy of that transcript is attached as Exhibit 12. As she explained, the Rados thought of Parker as a friend, and Parker took advantage of that friendship. Ex. 12 at 2. Mrs. Rado highlighted that Parker's pitch to invest in Parker Financial came at a very difficult time as they were dealing with the death of their twenty-

six year old son due to [REDACTED]. *Id.* at 2. To make matters worse, after Parker's scheme unraveled, Parker persisted in sending Mr. Rado text messages. *Id.* Mrs. Rado stated that she and her husband, "suffered emotional anguish and distress in fearing of other losses" through their investments with Parker. *Id.* at 3.

Parker's betrayal of trust cannot be overstated. He completely took advantage of victim-investors who he had known for decades. And he did so knowing these individuals were particularly vulnerable, preying on their grief after the loss of loved ones. Parker's conduct was clearly egregious.

Second, this was not an isolated or one-time lapse in judgment. As set forth in the OIP, and as the District Court expressly found, Parker engaged in a systematic and calculated plan to deceive investors over the course of approximately six years, from 2008 to 2014.

Third, as the District Court found, Parker knowingly and willfully engaged in securities fraud, as well as mail fraud, and filing false tax returns. He was a securities industry professional who knew the fraud he was engaged in was against the law, yet over the course of several years, he carried out his scheme to defraud in an effort to illegally raise money for his own use and benefit.

Fourth and fifth, Parker has provided no assurances that he will not violate the law again, and he has not acknowledged the wrongful nature of his conduct at any time. Parker has refused to answer the Commission's OIP, as well as the Order to Show Cause. His actions (and inactions) demonstrate unwillingness to accept responsibility for his wrongdoing. *See e.g. SEC v. Coplan*, Case No. 13-cv-62127, 2014 WL 695393, *8 (S.D. Fla. Feb. 24, 2014) (by virtue of failing to appear, the defendant "neither recognized the wrongful nature of her alleged conduct nor provided any assurances against future violations").

And sixth, although the Division is not aware if Parker is currently employed in the securities industry, there is a likelihood that the respondent's occupation could present opportunities for future violations. It is worth noting that the District Court issued an injunction even though it lacked knowledge of whether Parker was currently employed in the securities industry. Similarly, it is still appropriate to enjoin Parker from holding such employment.

In addition, although the mere existence of a past violation is itself insufficient basis to impose a bar, as the Supreme Court has recognized, the “‘degree of intentional wrongdoing evident in a defendant's past conduct’ is an important indication of the defendant's propensity to subject the trading public to future harm.” *In re Tzemach David Netzer Korem*, Exchange Act Release No. 70044, 2013 WL 3864511 at *6 & n.50 (July 26, 2013) (citing *Aaron v. SEC*, 446 U.S. 680, 701 (1980)). “[T]he existence of a violation raises an inference that it will be repeated.” *Geiger v. SEC*, 363 F.3d 481, 489 (D.C. Cir. 2004). Here too, this factor favors a bar.

Moreover, the “securities industry presents continual opportunities for dishonesty and abuse, and depends heavily on the integrity of its participants and on investors' confidence.” *Don Warner Reinhard*, Exchange Act Release No. 63720, 2011 WL 121451 at *8 (Jan. 14, 2011), citing *Conrad P. Seghers*, Advisers Act Rel. No. 2656 (Sept. 26, 2007), 91 SEC Docket 2293, 2304; see also *Charles Phillip Elliott*, 50 S.E.C. 1273, 1276 (1992) (stating that the securities industry is “a business that presents many opportunities for abuse and overreaching”), *aff'd*, 36 F.3d 86 (11th Cir. 1994) (per curiam). Parker's multi-year fraud scheme raises an inference that he will engage in such conduct again, and he has offered no evidence to rebut that inference.

For these reasons, imposing the requested bar is in the public interest and appropriate under Section 15(b) of the Exchange Act and Section 203(f) of the Adviser's Act. Further, under

15 U.S.C. § 78u, Parker should be prohibited in participating in an offering of penny stock.

While the test for imposing a penny stock bar differs slightly between Circuits, they share the common and similar factors, including whether the defendant's conduct was "egregious."

SEC v. Fierro, No. CV 20-02104 (GC) (JBD), 2024 WL 2292054, at *3 (D.N.J. May 21, 2024).

For all the factors described above, the penny stock bar is also warranted.

CONCLUSION

For the reasons discussed above, the Division asks the Commission to enter a default and sanctions against Parker by barring him from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization, and from participating in any offering of a penny stock.

September 6, 2024

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of September, 2024, I caused a true and correct copy of the foregoing Motion for Entry of An Order of Default and the Imposition of Remedial Sanctions Against Respondent Bernard M. Parker to be served upon the respondent by email at bernieparker@hotmail.com. In addition, a copy of same will be delivered via UPS, signature requested, to Parker at his last known address: [REDACTED]

[REDACTED]

[REDACTED]

Judson T. Mihok

UNITED STATES OF AMERICA
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ADMINISTRATIVE PROCEEDING
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INDEX OF EXHIBITS TO
DIVISION OF ENFORCEMENT'S BRIEF IN SUPPORT OF ITS
MOTION FOR DEFAULT AND REMEDIAL SANCTIONS AGAINST
RESPONDENT BERNARD M. PARKER

<u>Exhibit</u>	<u>Description</u>
1	Complaint <i>SEC v. Parker, 2:15-cv-01535 (2015)</i>
2	Indictment <i>USA v. Parker, 2:15-cr-00253 (2015)</i>
3	Superseding Indictment <i>USA v. Parker, 2:15-cr-00253 (2016)</i>
4	Judgment in a Criminal Case <i>USA v. Parker, 2:15-cr-00253</i>
5	Third Circuit Decision <i>USA v. Parker, 776 Fed. Appx. 756 (2019)</i>
6	Order <i>SEC v. Parker, 2:15-cv-01535</i>
7	Final Judgment as to Defendant Parker <i>SEC v. Parker, 2:15-cv-01535</i>
8	Certificate of Service <i>Administrative Proceeding File No. 3-21345</i>

- 9 Verdict Sheet and Special Interrogatory
 USA v. Parker, 2:15-cr-00253
- 10 Mrs. Higginson's Trial Testimony
 USA v. Parker, 2:15-cr-00253
- 11 Mr. Rado's Trial Testimony
 USA v. Parker, 2:15-cr-00253
- 12 Mr. Rado's Testimony at Sentencing Proceedings
 USA v. Parker, 2:15-cr-00253