

Respondent consents to the entry of this Order Instituting Administrative Proceedings Pursuant to Rule 102(e) of the Commission's Rules of Practice, Making Findings, and Imposing Remedial Sanctions ("Order"), as set forth below.

III.

On the basis of this Order and Respondent's Offer, the Commission finds that:

1. Novinger, age 38, is a resident of Cypress, California and has been an attorney licensed to practice in the State of California since 1999. From at least February 2007 through at least November 2007, Novinger issued legal opinions for the benefit of certain shareholders of Mobile Ready Entertainment Corp. ("Mobile Ready"), opining as to whether such shareholders could sell shares of Mobile Ready acquired in unregistered offerings and bearing restrictive legends into the public market, absent registration, pursuant to Rule 144 of the Securities Act of 1933 ("Securities Act").

2. On July 31, 2009, a final judgment was entered against Novinger, permanently enjoining her from future violations of Sections 5(a), 5(c) and 17(a) of the Securities Act and Section 10(b) of the Securities Exchange Act of 1934 ("Exchange Act") and Rule 10b-5 thereunder, in the civil action entitled Securities and Exchange Commission v. Albert J. Rasch, Jr., et al., Civil Action Number 1:09-CV-1190, in the United States District Court for the Northern District of Georgia. Novinger was also: (a) ordered to pay a \$10,000 civil monetary penalty; (b) ordered to pay post-judgment interest pursuant to 28 U.S.C. § 1961 on the civil penalty amount; and (c) barred Novinger for five years from participating in an offering of a penny stock. Novinger consented to the entry of the judgment without admitting or denying any of the allegations in the complaint.

3. The Commission's complaint alleged, among other things, that the legal opinions provided by Novinger to shareholders of Mobile Ready contained false and misleading statements of material fact, cited to nonexistent documents, and concluded without basis that more than 20 million shares acquired in unregistered offerings and bearing restrictive legends could be sold into the public market absent registration pursuant to Securities Act Rule 144.

IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanction agreed to in Respondent Novinger's Offer.

Accordingly, it is hereby ORDERED, effective immediately, that Novinger is suspended from appearing or practicing before the Commission as an attorney for five years. Furthermore, after five years from the date of this Order, Novinger has the right to apply for reinstatement by submitting an affidavit to the Commission's Office of the General Counsel truthfully stating, under

penalty of perjury, that she has complied with this Order, that she is not subject to any suspension or disbarment as an attorney by a court of the United States or of any state, territory, district, commonwealth, or possession, and that she has not been convicted of a felony or misdemeanor involving moral turpitude as set forth in Rule 102(e)(2) of the Commission's Rules of Practice.

By the Commission.

Elizabeth M. Murphy
Secretary