

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**SECURITIES EXCHANGE ACT OF 1934**

**Release No. 68048 / October 12, 2012**

**ADMINISTRATIVE PROCEEDING**

**File No. 3-15063**

**In the Matter of**

**JODY DUNN,**

**Respondent.**

**ORDER INSTITUTING  
ADMINISTRATIVE PROCEEDINGS  
PURSUANT TO SECTION 15(b) OF THE  
SECURITIES EXCHANGE ACT OF 1934,  
MAKING FINDINGS, AND IMPOSING  
REMEDIAL SANCTIONS**

**I.**

The Securities and Exchange Commission (“Commission”) deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted pursuant to Section 15(b) of the Securities Exchange Act of 1934 (“Exchange Act”) against Jody Dunn (“Dunn” or “Respondent”).

**II.**

In anticipation of the institution of these proceedings, Respondent has submitted an Offer of Settlement (the “Offer”) which the Commission has determined to accept. Solely for the purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, and without admitting or denying the findings herein, except as to the Commission’s jurisdiction over him and the subject matter of these proceedings and the findings contained in Section III.2 below, which are admitted, Respondent consents to the entry of this Order Instituting Administrative Proceedings Pursuant to Section 15(b) of the Securities Exchange Act of 1934, 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. Dunn, who is deaf, on behalf of Imperia Invest IBC ("Imperia"), a foreign internet-based entity that purported to invest in Traded Endowment Policies ("TEP"), solicited investments from approximately 7,133 investors, most of whom are deaf, in unregistered transactions. Dunn was the president, sole shareholder and a director of Global Wealth Lifepath, Inc. ("GWL") and Dunn World Investments ("DWI"), companies Dunn used to open bank accounts into which investor funds were deposited and from which the funds were wired to offshore bank accounts and Paypal-type accounts controlled by Imperia. Dunn purported to charge investors a fee for each transaction. Dunn has never been registered with the Commission or held any securities licenses. Dunn, 43 years old, is a resident of Corinth, Texas.

2. On September 29, 2012, a final judgment was entered by consent against Dunn, permanently enjoining him from future violations of Sections 5(a), 5(c), and 17(a) of the Securities Act of 1933 ("Securities Act"), Sections 10(b) and 15(a) of the Exchange Act and Rule 10b-5 thereunder, in the civil action entitled Securities and Exchange Commission v. Jody Dunn, et al., Civil Action Number 4:11-cv-00577, in the United States District Court for the Eastern District of Texas.

3. The Commission's complaint alleged that, in connection with the sale of TEPs through Imperia, Dunn misused and misappropriated investor funds; made material misrepresentations to investors; omitted material facts that would have been useful in investors' decisions to invest; transferred investor funds to his personal bank accounts; used the mail or other means or instrumentality of interstate commerce to effect the transactions in, or to induce the purchase and sale of securities while not registered as a broker-dealer or associated with a registered broker-dealer; failed to conduct any due diligence on Imperia prior to soliciting investors; and otherwise engaged in a variety of conduct which operated as a fraud and deceit on investors. The complaint also alleged that Dunn sold unregistered securities.

### IV.

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

Accordingly, it is hereby ORDERED pursuant to Section 15(b)(6) of the Exchange Act that Respondent Dunn be, and hereby is:

barred from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization; and

barred from participating in any offering of a penny stock, including: acting as a promoter, finder, consultant, agent or other person who engages in activities with a

broker, dealer or issuer for purposes of the issuance or trading in any penny stock, or inducing or attempting to induce the purchase or sale of any penny stock.

Any reapplication for association by the Respondent will be subject to the applicable laws and regulations governing the reentry process, and reentry may be conditioned upon a number of factors, including, but not limited to, the satisfaction of any or all of the following: (a) any disgorgement ordered against the Respondent, whether or not the Commission has fully or partially waived payment of such disgorgement; (b) any arbitration award related to the conduct that served as the basis for the Commission order; (c) any self-regulatory organization arbitration award to a customer, whether or not related to the conduct that served as the basis for the Commission order; and (d) any restitution order by a self-regulatory organization, whether or not related to the conduct that served as the basis for the Commission order.

By the Commission.

Elizabeth M. Murphy  
Secretary