

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 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. Davis, age 62, is a resident of New York, New York. Davis is a member of the New York State Bar. Davis was the chairman of the law firm of Dewey & LeBoeuf, LLP ("Dewey & LeBoeuf"), since its formation in October 2007 until around March 2012, and prior to that, Davis served as the chairman of its predecessor, LeBoeuf, Lamb, Greene & MacRae, LLP.

2. On March 6, 2014, the Commission filed a complaint against Davis in SEC v. Davis, et al., 15-cv-01528 (VEC), in the United States District Court for the Southern District of New York. On January 8, 2016, the court entered an order permanently enjoining Davis by consent, from future violations of Sections 17(a) of the Securities Act of 1933, and Section 10(b) of the Securities Exchange Act of 1934 ("Exchange Act") and Rule 10b-5 thereunder, and also prohibiting Davis from acting as an officer or director of any issuer that has a class of securities registered pursuant to Section 12 of the Exchange Act or that is required to file reports pursuant to Section 15(d) of the Exchange Act.

3. The Commission's complaint alleged, among other things, that in 2008 and 2009, Davis was aware of and supported efforts by employees and officers of Dewey & LeBoeuf to materially falsify the firm's financial statements, in order to meet certain covenants with its lenders. In 2010, Davis authorized Dewey & LeBoeuf to raise \$150 million in a private placement and to provide Dewey & LeBoeuf's fraudulent financial statements to investors in the private placement.

IV.

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

Accordingly, it is hereby ORDERED pursuant to Rule 102(e)(3)(i) of the Commission's Rules of Practice, effective immediately, that:

Davis is suspended from appearing or practicing before the Commission as an attorney.

By the Commission.

Brent J. Fields
Secretary