

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 86564 / August 5, 2019

ACCOUNTING AND AUDITING ENFORCEMENT
Release No. 4062 / August 5, 2019

ADMINISTRATIVE PROCEEDING
File No. 3-19307

In the Matter of

NANDU THONDAVADI,

Respondent.

**ORDER OF SUSPENSION PURSUANT
TO RULE 102(e)(2) OF THE
COMMISSION'S RULES OF PRACTICE**

I.

The Securities and Exchange Commission deems it appropriate to issue an order of forthwith suspension of Nandu Thondavadi (“Thondavadi”) pursuant to Rule 102(e)(2) of the Commission’s Rules of Practice [17 C.F.R. 201.102(e)(2)].¹

II.

The Commission finds that:

1. Thondavadi was the Chief Executive Officer of Quadrant 4 System Corp., an Illinois corporation headquartered in Schaumburg, Illinois. At the time of Thondavadi’s misconduct relevant to his guilty plea below, QFOR did not have any class of securities registered with the Commission, but was a reporting company pursuant to Section 15(d) of the Securities Exchange Act of 1934.

2. On November 28, 2018, Thondavadi pleaded guilty to wire fraud in *U.S. v. Nandu Thondavadi and Dhru Desai*, 16-cr-772, in the United States District Court for the Northern District of Illinois. ECF No. 93. According to Thondavadi’s plea agreement, Thondavadi and others “knowingly devised, intended to devise and participated in a scheme to defraud Quadrant

¹ Rule 102(e)(2) provides in pertinent part: “Any ... person who has been convicted of a felony or a misdemeanor involving moral turpitude shall be forthwith suspended from appearing or practicing before the Commission.”

4 System Corporation ('QFOR') and QFOR's shareholders, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and by concealment of material facts. ECF No. 94 at 2.

3. On June 6, 2019, Thondavadi was sentenced to 60 months in prison and \$2.916 million in restitution. ECF No. 122 at 2, 7.

III.

In view of the foregoing, the Commission finds that Thondavadi has been convicted of a felony within the meaning of Rule 102(e)(2) of the Commission's Rules of Practice.

Accordingly, it is ORDERED, that Nandu Thondavadi is forthwith suspended from appearing or practicing before the Commission pursuant to Rule 102(e)(2) of the Commission's Rules of Practice.

By the Commission.

Vanessa A. Countryman
Secretary