

October 10, 2019, the Commission issued an order approving the Proposed Plan,³ and posted the Plan of Distribution (the “Plan”).

The Plan provides for the distribution of the Net Fair Fund⁴ to harmed investors according to the methodology set forth in the Plan. Since the Net Fair Fund exceeds the total amount of consulting fees paid by the Eligible Investors, each Eligible Investor will receive a distribution payment equal to the full amount of the consulting fees they paid, as listed in paragraph 10 of the Plan.

Pursuant to the Plan, the Fund Administrator has compiled the payee information and prepared the attached payment file in a Commission-approved format. The Commission staff has reviewed the payment file and request that, pursuant to Rule 1101(b)(6) of the Commission’s Rules on Fair Fund and Disgorgement Plans,⁵ the Commission direct the payment of \$224,071 from the Fair Fund for distribution by the Fund Administrator to the Eligible Investors in accordance with the Plan.

Accordingly, it is hereby ORDERED that Commission staff shall direct the payment of \$224,071 from the Fair Fund to the Eligible Investors in accordance with the Plan.

By the Commission.

Vanessa A. Countryman
Secretary

³ See Order Approving Plan of Distribution, Exchange Act Rel. No. 87284 (Oct. 10, 2019).

⁴ All capitalized terms used herein but not defined shall have the same meanings ascribed to them in the Plan.

⁵ 17 C.F.R. § 201.1101(b)(6).