

UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING  
File No. 3-16374

**In the Matter of**  
  
DAVID R. WULF  
  
**Respondent**

**THE DIVISION OF ENFORCEMENT'S  
MOTION FOR SUMMARY DISPOSITION  
AGAINST RESPONDENT DAVID WULF**

The Division of Enforcement ("Division") hereby moves for summary disposition against Respondent David Wulf (collectively, "Respondent"), pursuant to Rule 154 and Rule 250 of the Commission's Rules of Practice. The Division respectfully submits that summary disposition is appropriate and that the Court should resolve this proceeding in favor of the Division and impose a collateral bar in the public interest against Respondent.

In support of this Motion, the Division relies upon the accompanying Memorandum of Law and the exhibits attached thereto. The Division respectfully requests that the Court grant this motion.

Dated: April 6, 2015

Respectfully submitted:

A handwritten signature in blue ink, appearing to read "Jonathan S. Polish".

Jonathan S. Polish  
Ana D. Petrovic  
Attorneys for the Division of Enforcement  
U.S. Securities and Exchange Commission  
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**CERTIFICATE OF SERVICE**

Ana D. Petrovic, an attorney, certifies that on April 6, 2015, she caused a true and correct copy of the Division of Enforcement's Motion for Summary Disposition Against Respondent David Wulf, and the Memorandum of Law in Support Thereof, to be served on the following:

Honorable James E. Grimes  
Administrative Law Judge  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549-2557  
(via UPS and email)

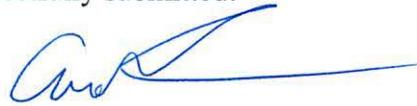
Mr. David R. Wulf



(via certified mail)

Dated: April 6, 2015

Respectfully submitted:



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UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
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ANA PETROVIC  
SENIOR ATTORNEY  
DIVISION OF ENFORCEMENT

DIRECT TELEPHONE: (312) 886-0831  
EMAIL: PetrovicA@sec.gov

April 6, 2015

**VIA UPS NEXT DAY AIR**

Brent J. Fields, Secretary  
Office of the Secretary  
Securities and Exchange Commission  
100 F. Street, N.E.  
Washington D.C. 20549

Re: *In the Matter of David R. Wulf*  
(Admin. Proc. File No. 3-16374)

Dear Mr. Fields:

Enclosed for filing in the above-referenced matter please find the original and three copies of the Division of Enforcement's Motion for Summary Disposition Against Respondent David R. Wulf, the Memorandum of Law in Support of the Division's Motion, with exhibits, and the related Certificate of Service.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ana D. Petrovic".

Ana D. Petrovic

Enclosures

Copies to: Hon. James E. Grimes, ALJ (via UPS and email)  
David R. Wulf (via certified mail)