

**HARD COPY**

**ADMINISTRATIVE PROCEEDING  
FILE NO. 3-17070**

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

**In the Matter of**

**3C ADVISORS & ASSOCIATES,  
INC., STEPHEN JONES, and  
DAVID PROLMAN**

**Respondents.**

**STIPULATED PROTECTIVE  
ORDER**

On January 27, 2016, the Division of Enforcement of the Securities and Exchange Commission (“Division”) filed an Order Instituting Proceedings against David Prolman (“Respondent”), which was served on Respondent on or before February 2, 2016. Respondent retained counsel who meet and conferred with Division counsel for the first time on March 3, 2016.

In compliance with Rule 230, on March 3, 2016 the Division offered Respondent the opportunity to review and inspect documents required to be made available by Rule 230 at its offices in Los Angeles, California. The Division represents that certain documents required to be made available to Respondents for inspection and copying contain Personally Identifiable Information (“PII”), such as social security numbers, taxpayer-identification numbers, birth dates, names of individuals known to be minors, mother’s maiden name, and financial-account numbers.

In light of the sensitive and confidential nature of the PII contained in certain documents to be made available to Respondents for inspection and copying, and because there is no clear benefit

to public disclosure of PII, but there is potential harm to the public from disclosure of such information, the Division and Respondent hereby stipulate and agree as follows:

**IT IS HEREBY STIPULATED AND ORDERED:**

**1. Division's Production**

a. The Division stipulates and agrees that the Division shall commence to produce documents to Respondent, at the Division's expense, within 7 days of the entry of this Stipulated Protected Order and without any redactions of PII.

**2. Protection of PII**

a. Respondent stipulates and agrees that any documents made available to Respondent for inspection and copying that contain PII shall not be used or disclosed by Respondent or Respondent's counsel for any purpose other than to prepare for and to conduct these proceedings, including any appeals.

b. Respondent further stipulates and agrees that only the following categories of persons are authorized to review any documents containing PII:

(i) Respondent and Respondent's counsel of record in the above-captioned proceedings, and their partners, employees and/or agents assisting such counsel with these proceedings, including any appeals from these proceedings.

(ii) Consultants, investigators, and/or experts employed or retained by Respondent or Respondent's counsel in connection with these proceedings, including any appeals from these proceedings.

(iii) Any potential witness in these proceedings.

(iv) The Division, including (but not limited to) the Office of the Secretary and the Office of Administrative Law Judges.

(v) Other persons by written consent of the Division or upon order of the Hearing Officer or a court on such conditions as may be agreed or ordered.

**3. Redaction of PII in Documents Filed With the Commission**

a. The Division and Respondent further stipulate and agree that any documents included as exhibits to, or quoted in, any brief, memorandum, pleading, or other submission in these proceedings, including any appeals, that contain PII, shall be redacted so as to reveal only:

- (i) The last four digits of the social-security number and taxpayer-identification number;
- (ii) The year of the individual's birth;
- (iii) The minor's and mother's maiden name initials; and
- (iv) The last four digits of the financial account number.

**4. Obligations upon Conclusion of Litigation**

Unless otherwise agreed or ordered, this Protective Order shall remain in force after dismissal or entry of final judgment not subject to further appeal.

**5. Non-Waiver**

Entry of this Protective Order is without waiver of and does not prejudice any future request by Respondent for production of documents or information, including by the Division.

**6. Order Subject to Modification**

This Protective Order shall take effect when entered and shall be binding on the Division, Respondents, Respondents' counsel, and persons made subject to this Protective Order by its terms.

**So Ordered.**

Dated:

\_\_\_\_\_  
Cameron Elliot  
Administrative Law Judge

**WE SO MOVE/STIPULATE and agree to abide by the terms of this Order.**

DATED: March 4, 2016

DIVISION OF ENFORCEMENT  
By its Attorneys:

*Lynn Dean - MM*

Lynn M. Dean (323) 965-3245  
Securities and Exchange Commission  
Los Angeles Regional Office  
444 South Flower Street, Suite 900  
Los Angeles, CA 90071  
(213) 443-1904 (*facsimile*)

DATED: March \_\_, 2016

\_\_\_\_\_  
Eric Dobberteen (213) 629-5700  
Clark Trevithick PLC  
800 Wilshire Boulevard, 12th Floor  
Los Angeles, CA 90017  
(213) 624-9441 (*facsimile*)  
Counsel for David Prolman

**So Ordered.**

Dated:

\_\_\_\_\_  
Cameron Elliot  
Administrative Law Judge

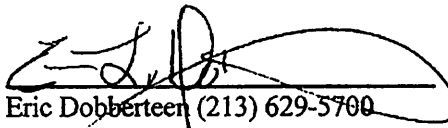
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(213) 443-1904 (*facsimile*)

DATED: March 3, 2016

  
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Los Angeles, CA 90017  
(213) 624-9441 (*facsimile*)  
Counsel for David Prolman

Certificate of Service

I certify that on March 4, 2016, I caused the foregoing to be served on the following persons by the method of delivery indicated below.

Brent J. Fields, Secretary  
Securities and Exchange Commission  
100 F. Street, NE, Mail Stop 1090  
Washington, D.C. 20549

(by United Parcel Service)  
(original and three copies)

Honorable Cameron Elliot  
Administrative Law Judge  
100 F Street, NE, Mail Stop 2557  
Washington, D.C. 20549-2557  
Email: alj@sec.gov

(by United Parcel Service and by  
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Counsel for 3C Advisors & Associates, Inc.,  
and Stephen Jones

(by email)

  
\_\_\_\_\_  
Lynn M. Dean