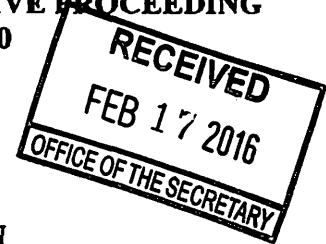


ADMINISTRATIVE PROCEEDING  
FILE NO. 3-17070



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 Securities and Exchange Commission ("Commission") filed an Order Instituting Proceedings against 3C Advisors & Associates, Inc., and Stephen Jones ("Respondents"), which was served on Respondents on or before February 10, 2016. Respondents' Answer is due March 1, 2016.

In connection with these proceedings, pursuant to Commission Rule of Practice 230, the Division of Enforcement (the "Division"), unless otherwise ordered by the Commission or the hearing officer, is required to commence making documents available to Respondents for inspection and copying no later than 7 days after service of the Order Instituting Proceedings. In compliance with Rule 230, the Division, on February 4, 2016, offered Respondents the opportunity to review the 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 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 Respondents 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 Respondents, 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. Respondents stipulates and agrees that any documents made available to Respondents for inspection and copying that contain PII shall not be used or disclosed by Respondents or Respondents' counsel for any purpose whatsoever, other than to prepare for and to conduct these proceedings, including any appeals.

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

(i) Respondents and Respondents' 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 Respondents or Respondents' counsel in connection with these proceedings, including any appeals from these proceedings.

(iii) Any potential witness in these proceedings.

(iv) The Commission, 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 Commission 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 Respondents 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 Respondents for production of documents or information, including by the Commission.

**6. Order Subject to Modification**

This Protective Order shall take effect when entered and shall be binding on the Commission, 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: February \_\_, 2016

DIVISION OF ENFORCEMENT  
By its Attorneys:

\_\_\_\_\_  
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: February \_\_, 2016

\_\_\_\_\_  
Frank J. Polek (619) 550-2455  
3033 Fifth Ave., Suite 225  
San Diego, CA 92103  
(619) 274-8166 (*facsimile*)  
Counsel for 3C Advisors & Associates, Inc.,  
and Stephen Jones

**5. Non-Waiver**

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

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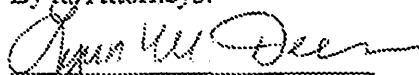
**So Ordered.**

Dated:


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

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

DATED: February 17, 2016

DIVISION OF ENFORCEMENT  
By its Attorneys:  
  
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: February 17, 2016

  
Frank J. Polek (619) 550-2455  
3033 Fifth Ave., Suite 225  
San Diego, CA 92103  
(619) 274-8166 (facsimile)  
Counsel for 3C Advisors & Associates, Inc.,  
and Stephen Jones

**In the Matter of 3C Advisors & Associates, Inc., Stephen Jones, and David Prolman**  
Administrative Proceeding File No. [3-17070]

Service List

Pursuant to Commission Rule of Practice 151 (17 C.F.R. § 201.151), I certify that the attached:

**STIPULATED PROTECTIVE ORDER**

was served on February 17, 2016, upon the following parties as follows:

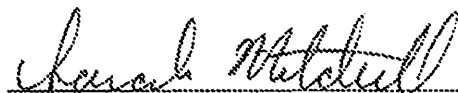
**By Facsimile and Overnight Mail**  
Brent J. Fields, Secretary  
Securities and Exchange Commission  
100 F. Street, N.E., Mail Stop 1090  
Washington, DC 20549-1090  
Facsimile: (703) 813-9793  
(Original and three copies)

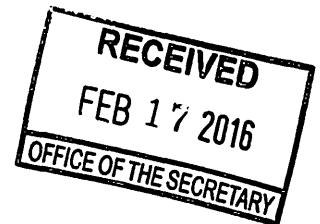
**By Email**  
Honorable Cameron Elliot  
Administrative Law Judge  
Securities and Exchange Commission  
100 F Street, N.E., Mail Stop 2557  
Washington, DC 20549-2557  
alj@sec.gov

**By Email and U.S. Mail**  
Frank Polek, Esq.  
Polek Law  
3033 Fifth Ave., Suite 225  
San Diego, CA 92103  
frank@poleklaw.com  
*Counsel for Respondents 3C Advisors & Associates, Inc. and Stephen C. Jones*

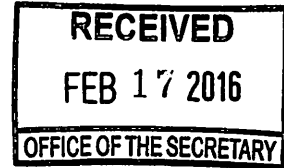
**By Email and U.S. Mail**  
Mr. David Prolman  
[REDACTED]  
Solana Beach, CA [REDACTED]  
dprolman@3Cadvisorsinc.com  
*Respondent*

Dated: February 17, 2016

  
Sarah Mitchell



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
100 F St. NE  
Washington, D.C. 20549



**FAX TRANSMITTAL**

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Attached please find the following two documents for filing in the matter of 3C Advisors & Associates, Inc., Stephen Jones, and David Prolman (AP No. 3-17070):

- Joint Status Report and Request for Pre-Hearing Conference
- Stipulated Protective Order

The signed original and three copies will follow by UPS.

***Sarah Mitchell, ACP***

Paralegal

U.S. Securities and Exchange Commission

Los Angeles Regional Office

Division of Enforcement

444 S. Flower Street, Suite 900

Los Angeles, CA 90071

Direct: (323) 965-3262 | Email: MitchellS@SEC.gov