

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-17650

In the Matter of

JOE LAWLER,

Respondent.

MOTION FOR
PROTECTIVE ORDER

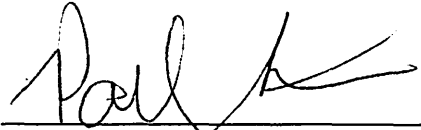
The Division of Enforcement hereby moves for entry of a protective order in the form attached hereto. As grounds for its motion, the Division states as follows:

1. Rule 230(a) of the Commission's Rules of Practice require the Division to make available for inspection and copying any party documents obtained by the Division prior to the institution of these proceedings ("Party Documents").
2. In this case, the Party Documents include confidential account information, Personally Identifiable Information, and other sensitive information such as that addressed in Fed. R. Civ. P. 5.2(a). Because the majority of the Party Documents includes this information, redaction of the documents is not practicable.
3. Additionally, in this case, Respondent is presently incarcerated, an environment in which disclosure of confidential, personal, or sensitive information may result in enhanced risk.
4. Accordingly, the Division asks that Respondent be ordered to keep the Party Documents confidential and not disclose them or divulge their contents to any person, except to counsel, to whom the records and their contents shall be disclosed solely for the purpose of properly preparing for and trying this matter.

5. The Division asks that the protective order not preclude, limit, restrict, or otherwise apply to the use of documents at any hearing, pre-hearing conference, or submission to the Court by either party.

Dated: November 16, 2016.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Polly Atkinson", written over a horizontal line.

Polly Atkinson
Division of Enforcement
Securities and Exchange Commission
Denver Regional Office
1961 Stout Street, Ste. 1700
Denver, CO 80294

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Division of Enforcement's Motion For Protective Order was served on the following on this 16th day of November, 2016, in the manner indicated below:

Securities and Exchange Commission
Brent Fields, Secretary
100 F Street, N.E.
Mail Stop 1090
Washington, D.C. 20549
(By Facsimile and original and three copies by UPS)

Hon. Judge Carol Fox Foelak
Administrative Law Judge
100 F Street, N.E.
Mail Stop 2557
Washington, D.C. 20549
(By Email)

Joe Lawler
Inmate No [REDACTED]
[REDACTED]
[REDACTED]
Herlong, CA [REDACTED]

Marla J. Pemberton

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Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-17650

In the Matter of

JOE LAWLER,

Respondent.

[Proposed]
PROTECTIVE ORDER

Upon motion by the Division of Enforcement for entry of a protective order, the Court hereby finds that:

6. Rule 230(a) of the Commission's Rules of Practice require the Division to make available for inspection and copying any party documents obtained by the Division prior to the institution of these proceedings ("Party Documents").

7. In this case, the Party Documents include confidential account information, Personally Identifiable Information, and other sensitive information such as that addressed in Fed. R. Civ. P. 5.2(a). Because the majority of the Party Documents includes this information, redaction of the documents is not practicable.

8. Additionally, in this case, Respondent is presently incarcerated, an environment in which disclosure of confidential, personal, or sensitive information may result in enhanced risk.

As a result, the Court finds that good cause exists for issuance of a protective order in this matter. Accordingly,

IT IS HEREBY ORDERED

1. Respondent shall keep the Party Documents confidential and shall in no way disclose them or divulge their contents to any person, except to counsel to whom the records and

their contents shall be disclosed solely for the purpose of properly preparing for and trying this matter.

2. The terms of this protective order do not preclude, limit, restrict, or otherwise apply to the use of documents at any hearing, pre-hearing conference, or submission to the Court.

SO ORDERED:

Dated this ___ day of _____, 2016.

BY THE COURT:
