

1 SEAN FINN  
2 NEVADA SOUTHERN  
3 DETENTION CENTER  
4 AGENCY #  
5 2190 MESQUITE AVE.  
6 PAHRUMP, NEVADA 89060



7 **UNITED STATES OF AMERICA**  
8 **before the**  
9 **SECURITIES AND EXCHANGE COMMISSION**  
10 **ADMINISTRATIVE PROCEEDING**

11 SECURITIES AND EXCHANGE )  
12 COMMISSION )

13 Plaintiff, )

14 v, )

15 MALOM GROUP, AG et al )

16 Defendant )

FILE NO.: 3-17693

**SEAN FINN'S RESPONSE TO SEC'S  
DIVISION OF ENFORCEMENT'S  
MOTION FOR SUMMARY  
DISPOSITION AND IMPOSITION OF  
SANCTIONS**

17 **CERTIFICATION: This Response is being filed timely**

18 Sean Finn Pro Se, hereby responds to the SEC's Division of Enforcement's, Motion for  
19 Summary Disposition and Imposition of Sanctions, filed on March 8, 2019.

20 On April 1, 2019, Finn sent this division a letter in response to the above Motion, informing the  
21 Division that, Finn has filed a Motion with the district court of Nevada, to dismiss the case-in-chief, No.  
22 2:13-cv-02280, *SEC v. Finn*.

23 The Division replied to Finn's letter, with another letter, claiming that Finn needs to follow the  
24 rules of the administrative proceedings described in 17 C.F.R. § 201, and numerous other rules, that could  
25 be found at a specific website. Not one CFR is contained, in the diluted version of "Lexis Nexis" that is  
26 available to Finn, nor does Finn have access to a computer, which allows internet research. Accordingly,  
27 Finn files this motion to the best of his ability, considering the circumstances of Finn being incarcerated  
28 and Pro Se, whereby he is now defending himself in 3 separate courts, for the same alleged crimes.

Therefore, Finn hereby files this in response to the Division of Enforcement's Motion for  
Summary Disposition and Imposition of Sanctions, whereby Finn is requesting this Court to Stay all  
Administrative Proceedings, until the determination of Finn's Motion to dismiss the case-in-chief 2:13-

1 cv-02280, *SEC v. Finn*. with the District Court, filed on March 29, 2019, via “mail system” First Class  
2 Mail from the Nevada Southern Detention Center.

3 The described dismissal, was timely, and clearly proves that, the “Final Default Judgment” was  
4 fallaciously obtained by the Securities and Exchange Commission (Stephen Simpson), and upon the  
5 District Court dismissing the case-in-chief, consequently, the Division of Enforcement’s actions will  
6 become moot. In the unlikely event that, the District Court does not dismiss this case, Finn will  
7 immediately appeal to the 9<sup>th</sup> Circuit Court of Appeals.

8 In the event this Stay is not granted, Finn hereby objects to the unfounded summations, and  
9 assemblage of evidence, contained in the “Motion of Summary Disposition” in its entirety,

10 **CONCLUSION**

11 For the above stated reason's, these “Administrative Proceedings” should be stayed until the final  
12 outcome of the case-in-chief.

13  
14 **DATED: May 8, 2019**


  
Sean Finn – Pro Se

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**PROOF OF SERVICE**

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I Sean Finn, hereby declare that the forgoing document was deposited with the facilities mail system, to be sent, via first class mail on May 8, 2019 from Nevada Southern Detention Center, to the Commission's Secretary, 100 F. Street NE, Mail Stop 1090, Washington, DC 20549



Sean Finn



**DIVISION OF  
ENFORCEMENT**

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION**

100 F Street N.E.  
Washington, DC 20549

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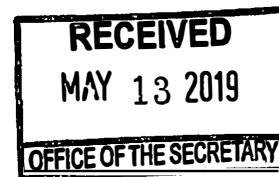
April 29, 2019

**Via UPS**

Sean P. Finn

Inmate [REDACTED]

[REDACTED],  
Pahrump, NV [REDACTED]



Re: *Securities and Exchange Commission File No. 3-17698*

Dear Mr. Finn:

Thank you for your letter dated April 1, 2019. Please be advised that your letter to me does not constitute a filing with the Office of Administrative Law Judges. Kindly see the attached which contains filing instructions for your information.

Sincerely,

Hemma R. Lomax  
Senior Counsel

Enclosures: ALJ Instructions for Defendant