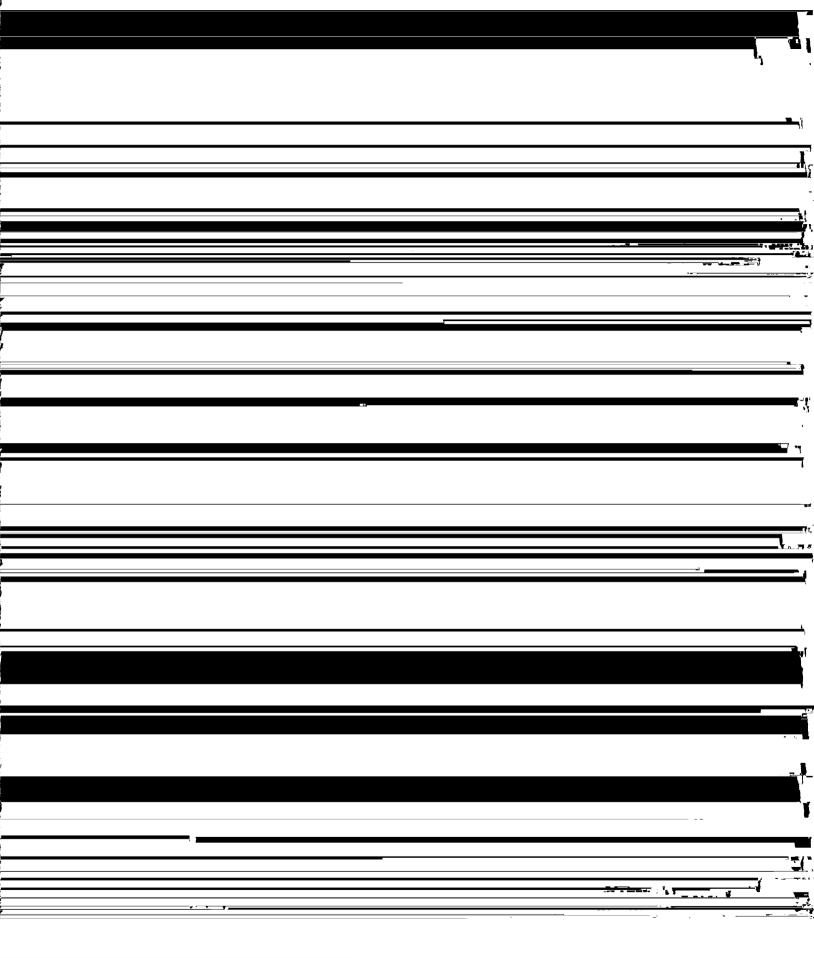


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7. During the course of its investigation the Division determined that, between January of 2014 and February of 2016, Dufresne converted at least \$453,000 from seven (7) customers (the "Victims") through various deceptive and manipulative means, including the use of fabricated distribution requests to the insurers who held the Victims' variable annuities.



South Carolina;
NOW, THEREFORE, it is hereby ORDERED, and the Respondent expressly consents
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a. SagePoint will implement the policies and procedures agreed upon with the
Division; b. Sagepoint will reimburse the Division for its costs incurred in the
investigation of this matter in the amount of fifteen thousand dollars
(\$15,000): and
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