

with the subject matter of the processing, unless the controller is

investigation into Dufresne and SagePoint.

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

and agrees and.

- 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

14 August

Agan Wilson

Securities Commissioner  
State of South Carolina

PLIV

7/20/2017

*[Handwritten signature]*