

him and the subject matter of this proceeding, and hereby elects to waive, permanently, any right

Order; and

WHEREAS, without admitting or denying whether the Respondent's securities-related activities, which are the subject of the Division's investigation, violated the Act, the Respondent is willing to accept the remedy set forth below to conclude this matter; and

WHEREAS, the Act requires investment advisers and investment adviser representatives to properly register with the Division prior to operating and acting as such; and

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