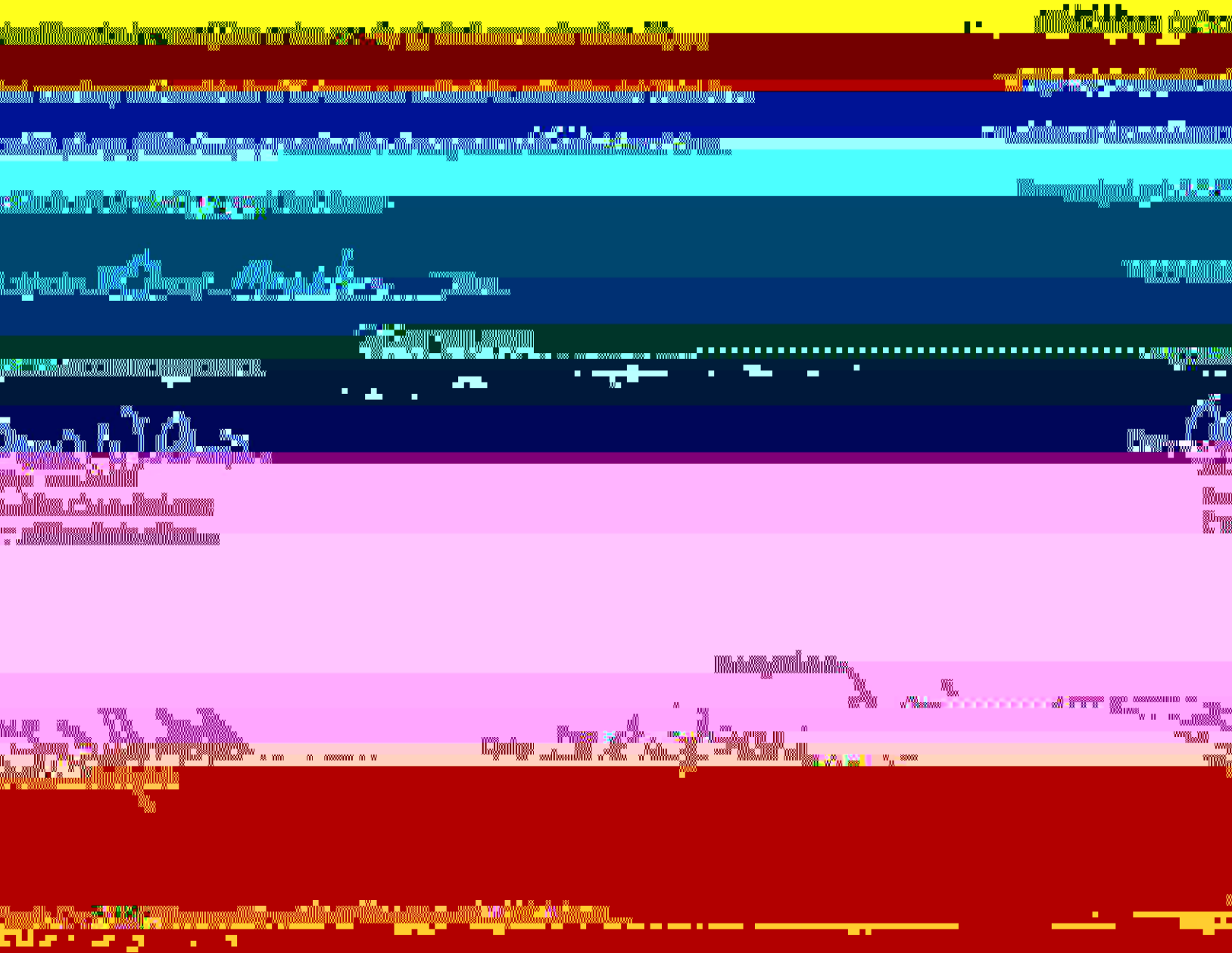


in the Order to Cease and Desist. The Respondent elects to waive permanently any right to a

If the Respondent breaches this agreement, the Securities Commissioner may vacate this Order.
Order. Nothing in this paragraph affects the Respondent's: (i) testimonial obligations or (ii) right
to take differing legal or factual positions in litigation or other legal proceedings.



By: *[Signature]*

Date: *5/16/2021*

Jonathan B. Williams
Assistant Deputy Attorney General