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8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10  
11  
12 SECURITIES AND EXCHANGE  
13 COMMISSION,

Case No. 2:23-cv-08079

14 Plaintiff,

**COMPLAINT**

15 vs.

16 MARCO A. PEREZ (aka MARC  
17 PEREZ), PEDRO PEREZ, JR. (aka  
18 PETER PEREZ), and OLIVIA PEREZ  
DURBIN,

19 Defendants.  
20

21  
22 Plaintiff Securities and Exchange Commission (“SEC”) alleges:

23 **JURISDICTION AND VENUE**

24 1. The Court has jurisdiction over this action pursuant to Sections 21(d)(1),  
25 21(d)(3)(A), 21(e) and 27(a) of the Securities Exchange Act of 1934 (“Exchange  
26 Act”), 15 U.S.C. §§ 78u(d)(1), 78u(d)(3)(A), 78u(e) & 78aa(a).

27 2. Defendants have, directly or indirectly, made use of the means or  
28 instrumentalities of interstate commerce, of the mails, or of the facilities of a national

1 securities exchange in connection with the transactions, acts, practices and courses of  
2 business alleged in this complaint.

3 3. Venue is proper in this district pursuant to Section 27(a) of the Exchange  
4 Act, 15 U.S.C. § 78aa(a) because certain of the transactions, acts, practices and  
5 courses of conduct constituting violations of the federal securities laws occurred  
6 within this district. In addition, venue is proper in this district because Defendants  
7 Marco A. Perez (“Marc Perez”), Pedro Perez, Jr. (“Peter Perez”), and Olivia Perez  
8 Durbin all reside in this judicial district.

9 **SUMMARY**

10 4. This civil enforcement action concerns insider trading by defendants  
11 Marc Perez, Peter Perez, and Durbin in the securities of General Finance Corporation  
12 (“General Finance”). Defendants are siblings. Marc Perez, General Finance’s  
13 accounting manager, learned in February 2021 that United Rentals, Inc. (“United  
14 Rentals”), the world’s largest equipment rental company, was pursuing an acquisition  
15 of General Finance’s storage business. Marc Perez traded on that material non-public  
16 information and tipped his siblings, knowing that they too would trade. The day after  
17 United Rentals’ acquisition of General Finance became public in April 2021, General  
18 Finance’s stock price increased 56% on trading volume 19,000% higher than the  
19 company’s average daily volume over the prior two months. Defendants then sold,  
20 and collectively made about \$660,000 in illegal trading profits.

21 5. By engaging in this conduct, defendants Marc Perez, Peter Perez, and  
22 Durbin violated Sections 10(b) and 14(e) of the Exchange Act, 15 U.S.C. §§ 78j(b)  
23 and 78n(e), and Rules 10b-5 and 14e-3 thereunder, 17 C.F.R. §§ 240.10b-5 and  
24 240.14e-3.

25 6. With this complaint, the SEC seeks permanent injunctions prohibiting  
26 defendants’ future violations of the federal securities laws, disgorgement of  
27 defendants’ ill-gotten gains together with prejudgment interest, civil penalties from  
28 defendants, and officer and director bars as to defendants Marc Perez and Peter Perez.

1 **DEFENDANTS AND RELATED ENTITIES**

2 7. **Marco A. Perez, aka Marc Perez**, age 58, resides in Glendora,  
3 California. Marc Perez worked as General Finance’s accounting manager from 2014  
4 to October 2021. In 2014, Marc Perez acknowledged in writing that he had reviewed  
5 and would abide by General Finance’s policy prohibiting insider trading and the  
6 tipping of material non-public information.

7 8. **Pedro Perez, Jr., aka Peter Perez**, age 54, resides in Pasadena,  
8 California. Peter Perez is Marc Perez’s brother. Peter Perez is an executive vice  
9 president of a privately-held company.

10 9. **Olivia Perez Durbin**, age 46, resides in San Dimas, California. Durbin  
11 is Marc Perez’s sister. She is a pharmaceutical sales representative.

12 10. **General Finance Corporation** was a Delaware corporation with its  
13 principal place of business in Pasadena, California. General Finance provided  
14 mobile, liquid, and pod storage space. Before being acquired by United Rentals in  
15 2021, General Finance was an SEC-reporting public company and its stock traded on  
16 the Nasdaq Global Market under the ticker symbol GFN.

17 11. **United Rentals, Inc.**, is incorporated in Delaware and its principal place  
18 of business is Stamford, Connecticut. United Rentals is an equipment rental  
19 company. United Rentals is an SEC-reporting public company, and its stock is traded  
20 on the New York Stock Exchange under the ticker symbol URI.

21 **THE ALLEGATIONS**

22 **A. Marc Perez Learns About the United Rentals Acquisition Proposal**

23 12. From 2019 to February 2020, General Finance retained a financial  
24 advisor to approach potential suitors to evaluate market interest in acquiring the  
25 company.

26 13. United Rentals was one of the potential acquirors approached by General  
27 Finance’s financial advisor.

28 14. After receiving no acceptable offers, General Finance terminated that

1 process in February 2020.

2 15. In December 2020, however, General Finance began to receive  
3 unsolicited inquiries, including non-binding proposals to acquire the company.

4 16. Starting on February 16, 2021, General Finance's chairman of the board  
5 forwarded those communications to Marc Perez, who received emails that enclosed  
6 both the proposals and General Finance's analysis of the proposals.

7 17. On February 22, 2021, United Rentals contacted General Finance's chief  
8 executive officer and requested a conference call to discuss a potential acquisition.

9 18. Following the contact, Marc Perez – who worked in General Finance's  
10 head office – became aware of United Rentals' renewed interest in acquiring General  
11 Finance.

12 19. Three days later, during a February 25 conference call, General Finance  
13 encouraged United Rentals to submit an acquisition proposal no later than March 3,  
14 2021. General Finance explained to United Rentals that its board planned to meet on  
15 March 3 to consider other acquisition proposals already received from potential  
16 suitors.

17 20. On March 2, 2021, United Rentals emailed to General Finance a non-  
18 binding proposal to acquire General Finance for \$19-20 per share, subject to  
19 satisfactory due diligence and other matters. General Finance's closing price on  
20 March 2 was \$10.63 per share.

21 21. At the end of the day, General Finance's chief executive officer emailed  
22 the United Rentals \$19-20 per share acquisition proposal to General Finance's  
23 chairman of the board, who in turn forwarded the proposal to Marc Perez that same  
24 day.

25 22. From March 2 to March 15, 2021, Marc Perez learned more non-public  
26 information about the United Rentals acquisition.

27 23. In that period, General Finance's general counsel regularly asked Marc  
28 Perez to compile financial documentation related to the United Rentals acquisition.

1           24. In addition, on March 15, Marc Perez received a board package for  
2 General Finance's March 16 board of directors meeting; those materials contained  
3 United Rentals' March 14 revised acquisition proposal that suggested structuring the  
4 acquisition as a tender offer.

5 **B. Marc Perez Trades on the United Rentals Acquisition Proposal**

6           25. In 2014, Marc Perez signed an acknowledgment that he had reviewed  
7 and would abide by General Finance's policy prohibiting insider trading or tipping.

8           26. Over the years of Marc Perez's employment at General Finance, he was  
9 also told by the company's general counsel that he would need to pre-clear all of his  
10 trades in the company's stock.

11           27. From March 2 to March 3, 2021, Marc Perez purchased 31,250 shares of  
12 General Finance worth approximately \$354,000 using his brokerage account.

13           28. Prior to these trades, Marc Perez's shares in General Finance accounted  
14 for about 34% of his overall stock portfolio. Following these trades, Marc Perez's  
15 shares in General Finance accounted for 99.7% of his overall stock portfolio.

16           29. In addition, on March 3 and March 22, 2021, Marc Perez transferred  
17 about \$85,000 from his bank account to a brokerage account opened in the name of  
18 his mother.

19           30. Marc Perez had authority to trade with his mother's brokerage account.

20           31. From March 8 to March 23, 2021, Marc Perez purchased another 35,000  
21 shares of General Finance worth approximately \$421,000 using his mother's  
22 brokerage account. Marc Perez's mother had no knowledge of these trades.

23 **C. Marc Perez Tips Peter Perez and Durbin, Who Also Trade**

24           32. At family gatherings during the relevant period, Marc Perez told his  
25 brother, Peter Perez, and his sister, Durbin, that he believed that General Finance was  
26 going to be taken over and that he had more confidence that it would occur than prior  
27 takeover attempts.

28           33. At family gatherings during the relevant period, Marc Perez told his

1 brother, Peter Perez, and his sister, Durbin, that he had purchased General Finance  
2 stock and that they should too.

3 34. At family gatherings during the relevant period, Marc Perez told his  
4 brother, Peter Perez, that he was “all in” on General Finance stock.

5 **1. Peter Perez trades on the tip from his brother**

6 35. From March 29 to April 14, 2021, Peter Perez purchased approximately  
7 17,500 shares of General Finance worth approximately \$215,000 in his IRA account  
8 and a joint brokerage account with his wife.

9 36. To pay for the purchases of General Finance stock by his IRA account,  
10 Peter Perez sold all of his existing stake in a managed mutual fund tailored for  
11 investors retiring at age 65.

12 37. To pay for the purchases of General Finance stock by his joint brokerage  
13 account with his wife, Peter Perez transferred about \$137,000 in cash from his bank  
14 account.

15 **2. Durbin trades on the tip from her brother**

16 38. After being tipped by her brother, Marc Perez, Durbin opened a new  
17 brokerage account, and transferred \$65,000 into that new trading account.

18 39. From April 2 to April 6, 2021, Durbin used all of those funds to  
19 purchase about 5,100 shares of General Finance worth approximately \$62,000.

20 **D. General Finance Publicly Announces the Acquisition and Defendants Sell**  
21 **at a Profit**

22 40. After market close on April 15, 2021, General Finance and United  
23 Rentals publicly announced that United Rentals would acquire General Finance  
24 through a cash tender offer for \$19 per share of General Finance stock, followed by a  
25 merger of General Finance with a United Rentals acquisition entity.

26 41. Following the announcement, General Finance’s stock price increased  
27 \$6.78 per share from \$12.17 to \$18.95 per share.

28 42. On April 16, 2021, one day after the public announcement of the

1 acquisition, Peter Perez sold about 15,500 shares of General Finance for  
2 approximately \$333,000.

3 43. From April 20 to April 23, 2021, Marc Perez sold about 66,250 shares of  
4 General Finance for approximately \$1.3 million.

5 44. On May 6, 2021, Durbin tendered her General Finance shares as part of  
6 the acquisition for approximately \$97,000.

7 45. Defendants' profits from all of the trading alleged above totaled to about  
8 \$660,000.

9 **E. The United Rentals Acquisition Proposal Was Material Non-Public**  
10 **Information**

11 46. The information that Marc Perez learned, as alleged above, about United  
12 Rentals' acquisition of General Finance, was material and non-public.

13 47. The discussions between General Finance and United Rentals alleged  
14 above were non-public and subject to a confidentiality agreement between the two  
15 companies.

16 48. General Finance's stock price increased 56% on the public  
17 announcement of the acquisition.

18 49. On the first trading day following the announcement, trading volume in  
19 General Finance stock spiked from an average daily trading volume in the prior two  
20 months of about 26,000 shares, to about 5 million shares.

21 50. A reasonable investor would have viewed the information that Marc  
22 Perez learned about United Rentals' acquisition of General Finance as significantly  
23 altering the total mix of information available to investors.

24 **F. Marc Perez Breached His Fiduciary Duty To General Finance**

25 51. As General Finance's accounting manager, Marc Perez was a company  
26 insider. He had a duty under the terms of General Finance's insider trading policy to  
27 maintain the company's confidential information and not use it for his own benefit.

28 52. Marc Perez breached the fiduciary duties of trust and confidence he

1 owed to General Finance by trading on the material non-public information he  
2 obtained concerning the potential acquisition of General Finance by United Rentals.

3 53. Further, when tipping his siblings Peter Perez and Durbin material non-  
4 public information about United Rentals' plans to acquire General Finance, Marc  
5 Perez breached the fiduciary duties of trust and confidence he owed to General  
6 Finance, and disclosed that information for a personal benefit by giving valuable  
7 insider information to his siblings.

8 **G. Peter Perez and Durbin Knew or Should Have Known That Marc Perez**  
9 **Breached His Fiduciary Duty When Tipping Them**

10 **1. Peter Perez**

11 54. Peter Perez knew that Marc Perez worked for General Finance, that  
12 Marc Perez had access to information known only by those who worked at the  
13 company, and that his brother believed that General Finance's stock price would  
14 increase after its acquisition by United Rentals became public.

15 55. Peter Perez knew or should have known that his brother was tipping him  
16 material non-public information so that he could profit on information that the market  
17 did not yet have.

18 56. When he traded in the securities of General Finance, Peter Perez knew or  
19 should have known that his brother, Marc Perez, had tipped him material non-public  
20 information about General Finance with the intent to benefit Peter Perez.

21 57. When he traded in the securities of General Finance, Peter Perez knew or  
22 should have known that the material non-public information about General Finance  
23 that his brother, Marc Perez, had tipped him was disclosed or misappropriated by  
24 Marc Perez in breach of his fiduciary duty, or similar relationship of trust and  
25 confidence, to his employer, General Finance.

26 **2. Durbin**

27 58. Durbin knew that Marc Perez worked for General Finance, that Marc  
28 Perez had access to information known only by those who worked at the company,



1 and that her brother believed that General Finance’s stock price would increase after  
2 its acquisition by United Rentals became public.

3 59. Durbin knew or should have known that her brother was tipping her  
4 material non-public information so that she could profit on information that the  
5 market did not yet have.

6 60. When she traded in the securities of General Finance, Durbin knew or  
7 should have known that her brother, Marc Perez, had tipped her material non-public  
8 information about General Finance with the intent to benefit Durbin.

9 61. When she traded in the securities of General Finance, Durbin knew or  
10 should have known that the material non-public information about General Finance  
11 that her brother, Marc Perez, had tipped her was disclosed or misappropriated by  
12 Marc Perez in breach of his fiduciary duty, or similar relationship of trust and  
13 confidence, to his employer, General Finance.

14 **H. Defendants Acted with Scienter**

15 62. Marc Perez acted with scienter. He had acknowledged receipt of  
16 General Finance’s policy prohibiting insider trading and tipping. General Finance’s  
17 general counsel had repeatedly told Marc Perez that he needed to pre-clear his trades,  
18 but for the trading alleged above, Marc Perez did not seek pre-clearance. In March  
19 2021, Marc Perez continued buying shares of General Finance as he came to learn  
20 even more material non-public information demonstrating that the acquisition was  
21 ever more likely. Finally, Marc Perez attempted to hide the majority of his trades in  
22 General Finance by trading through a brokerage account in the name of his mother,  
23 without her knowledge.

24 63. Peter Perez knew or was reckless in not knowing that he was trading on  
25 material non-public information. Peter Perez knew that Marc Perez had gone “all in”  
26 with his General Finance stock purchases. He then liquidated his retirement holdings  
27 and transferred additional funds into another brokerage account in order to buy  
28 General Finance shares.

1           64. Durbin knew or was reckless in not knowing that she was trading on  
2 material non-public information. After being tipped by her brother, Marc Perez, she  
3 opened a new brokerage account and funded it for the sole purpose of buying General  
4 Finance stock. When Durbin could not immediately access all of the funds that she  
5 had transferred into that brokerage account, she complained to the brokerage about  
6 not being able to place trades and communicated that she urgently wanted to trade in  
7 General Finance and wanted to buy its stock before the price increased any further.

8 **I. Defendants Traded in General Finance Securities After Substantial Steps**  
9 **Had Been Taken Towards a Tender Offer While in Possession of MNPI**

10           65. Defendants' trading in the securities of General Finance alleged above  
11 occurred after United Rentals took substantial steps towards a tender offer.

12           66. When defendants began to purchase General Finance shares, United  
13 Rentals and General Finance had already entered into a confidentiality agreement  
14 concerning their merger discussions.

15           67. When defendants began to purchase General Finance shares, United  
16 Rentals and General Finance senior management had already discussed a possible  
17 acquisition.

18           68. When defendants began to purchase General Finance shares, United  
19 Rentals had already conducted preliminary due diligence of General Finance.

20           69. Marc Perez knew that he was trading on information he had directly  
21 obtained as an insider of the stock's issuer, General Finance.

22           70. Peter Perez knew or should have known that the information he was  
23 trading on – tipped to him by his brother Marc Perez, General Finance's accounting  
24 manager – was acquired directly or indirectly from an insider of the stock's issuer,  
25 General Finance.

26           71. Durbin knew or should have known that the information she was trading  
27 on – tipped to her by her brother Marc Perez, General Finance's accounting manager  
28 – was acquired directly or indirectly from an insider of the stock's issuer, General

1 Finance.

2 **FIRST CLAIM FOR RELIEF**

3 **Fraud in Connection With the Purchase Or Sale Of Securities**

4 **Violations of Section 10(b) of the Exchange Act and Rule 10b-5 Thereunder**  
5 **(Against All Defendants)**

6 72. The SEC realleges and incorporates by reference paragraphs 1 through  
7 71 above.

8 73. Marc Perez knew, or was reckless in not knowing, that the information  
9 he possessed concerning the potential acquisition of General Finance was material  
10 non-public information.

11 74. Marc Perez also knew, or was reckless in not knowing, that he owed  
12 General Finance a duty of trust or confidence to keep the material, non-public  
13 information he possessed concerning the potential acquisition of General Finance  
14 confidential.

15 75. By disclosing that material, non-public information concerning General  
16 Finance's securities to his siblings, Peter Perez and Durbin, Marc Perez  
17 misappropriated confidential information belonging to General Finance for securities  
18 trading purposes, in breach of a duty of trust or confidence he owed to General  
19 Finance.

20 76. Marc Perez tipped Peter Perez and Durbin with material non-public  
21 information concerning the potential acquisition of General Finance with the intent to  
22 benefit his siblings, Peter Perez and Durbin.

23 77. Marc Perez knew or recklessly disregarded that Peter Perez and Durbin  
24 would trade on the basis of that material non-public information.

25 78. Marc Perez, directly or indirectly, personally benefited from disclosing  
26 that material, non-public information to his siblings because giving a gift of trading  
27 information is the same as trading by the tipper followed by a gift of proceeds.

28 79. At the time he traded in the securities of General Finance, Peter Perez

1 knew or was reckless in not knowing that he was in possession of material non-public  
2 information concerning General Finance's securities.

3 80. At the time he traded in the securities of General Finance, Peter Perez  
4 knew or should have known that the material, non-public information about General  
5 Finance that Marc Perez had disclosed to him was disclosed or misappropriated by  
6 Marc Perez in breach of a fiduciary duty, or similar relationship of trust and  
7 confidence.

8 81. At the time he traded in the securities of General Finance, Peter Perez  
9 knew or should have known that Marc Perez had tipped him material non-public  
10 information about General Finance with the intent to benefit Peter Perez.

11 82. At the time she traded in the securities of General Finance, Durbin knew  
12 or was reckless in not knowing that she was in possession of material non-public  
13 information concerning General Finance's securities.

14 83. At the time she traded in the securities of General Finance, Durbin knew  
15 or should have known that the material, non-public information about General  
16 Finance that Marc Perez had disclosed to her was disclosed or misappropriated by  
17 Marc Perez in breach of a fiduciary duty, or similar relationship of trust and  
18 confidence.

19 84. At the time she traded in the securities of General Finance, Durbin knew  
20 or should have known that Marc Perez had tipped her material non-public  
21 information about General Finance with the intent to benefit Durbin.

22 85. By engaging in the conduct described above, defendants Marc Perez,  
23 Peter Perez, and Durbin, directly or indirectly, in connection with the purchase or sale  
24 of securities, by use of the means or instrumentalities of interstate commerce, or the  
25 mails, or the facilities of a national securities exchange: (a) employed devices,  
26 schemes or artifices to defraud; (b) made untrue statements of material facts or  
27 omitted to state material facts necessary in order to make the statements made, in  
28 light of the circumstances under which they were made, not misleading; and/or

1 (c) engaged in acts, practices, or courses of business which operated or would operate  
2 as a fraud or deceit upon any person in connection with the purchase or sale of any  
3 security.

4 86. By engaging in the foregoing conduct, defendants Marc Perez, Peter  
5 Perez, and Durbin violated, and unless enjoined will continue to violate, Section  
6 10(b) of the Exchange Act, 15 U.S.C. § 78j(b), and Rule 10b-5 thereunder, 17 C.F.R.  
7 § 240.10b-5.

8 **SECOND CLAIM FOR RELIEF**

9 **Violations of Section 14(e) of the Exchange Act and Rule 14e-3 Thereunder**  
10 **(Against All Defendants)**

11 87. The SEC realleges and incorporates by reference paragraphs 1 through  
12 71 above.

13 88. By the time of defendants' trading in General Finance's securities in  
14 March and April 2021, substantial steps had been taken by United Rentals to  
15 complete a tender offer to acquire General Finance's securities.

16 89. Marc Perez was in possession of material information relating to such  
17 tender offer which information he knew or had reason to know was non-public and  
18 which he knew or had reason to know he had acquired, directly or indirectly, from the  
19 offering person, and/or its officers, directors, partners, employees, or other persons  
20 acting on behalf of the offering person. Marc Perez was required to refrain from  
21 communicating that information to third-parties, including Peter Perez and Durbin,  
22 under circumstances in which it was reasonably foreseeable that such  
23 communications were likely to result in the trading of General Finance's securities.

24 90. By communicating that material non-public information concerning such  
25 tender offer to Peter Perez and Durbin, for the purpose of benefiting them and with  
26 the expectation that they would trade in General Finance's securities on the basis of  
27 that information, Marc Perez caused Peter Perez and Durbin to purchase and sell  
28 General Finance's securities.

1 91. At the time they traded in General Finance’s securities, defendants Marc  
2 Perez, Peter Perez, and Durbin were in possession of material information regarding  
3 such tender offer that they knew or had reason to know was non-public and had been  
4 acquired, directly or indirectly, by Marc Perez, an insider of General Finance, from  
5 the issuer.

6 92. By engaging in the foregoing conduct, defendants Marc Perez, Peter  
7 Perez, and Durbin violated, and unless enjoined will continue to violate, Section  
8 14(e) of the Exchange Act, 15 U.S.C. § 78n(e), and Rule 14e-3 thereunder, 17 C.F.R.  
9 § 240.14e-3.

10 **PRAYER FOR RELIEF**

11 WHEREFORE, the SEC respectfully requests that the Court:

12 **I.**

13 Issue findings of fact and conclusions of law that Defendants Marc Perez, Peter  
14 Perez, and Durbin committed the alleged violations.

15 **II.**

16 Issue judgments, in forms consistent with Rule 65(d) of the Federal Rules of  
17 Civil Procedure, permanently enjoining Defendants Marc Perez, Peter Perez, and  
18 Durbin, and their officers, agents, servants, employees and attorneys, and those  
19 persons in active concert or participation with any of them, who receive actual notice  
20 of the judgment by personal service or otherwise, and each of them, from violating  
21 Section 10(b) of the Exchange Act [15 U.S.C. §§ 78j(b)] and Rule 10b-5 thereunder  
22 [17 C.F.R. § 240.10b-5] and Section 14(e) of Exchange Act [15 U.S.C. § 78n(e)] and  
23 Rule 14e-3 thereunder [17 C.F.R. § 240.14e-3].

24 **III.**

25 Issue a judgment, in a form consistent with Rule 65(d) of the Federal Rules of  
26 Civil Procedure and pursuant to Section 21(d)(2) of the Exchange Act [15 U.S.C. §  
27 78u(d)(2) and/or Section 20(e) of the Securities Act [15 U.S.C. § 77t(e)], permanently  
28 enjoining Defendants Marc Perez and Peter Perez from acting as an officer or director

1 of any issuer that has a class of securities registered pursuant to Section 12 of the  
2 Exchange Act [15 U.S.C. § 78l] or that is required to file reports pursuant to Section  
3 15(d) of the Exchange Act [15 U.S.C. § 78o(d)].

4 **IV.**

5 Order Defendants Marc Perez, Peter Perez, and Durbin to disgorge all funds  
6 received from their illegal conduct, together with prejudgment interest thereon,  
7 pursuant to Exchange Act Sections 21(d)(3), 21(d)(5) and 21(d)(7) [15 U.S.C. §§  
8 78u(d)(5) and 78u(d)(7)].

9 **V.**

10 Order Defendants Marc Perez, Peter Perez, and Durbin to pay civil penalties  
11 under Section 21A of the Exchange Act [15 U.S.C. § 78u-1].

12 **VI.**

13 Retain jurisdiction of this action in accordance with the principles of equity and  
14 the Federal Rules of Civil Procedure in order to implement and carry out the terms of  
15 all orders and decrees that may be entered, or to entertain any suitable application or  
16 motion for additional relief within the jurisdiction of this Court.

17 **VII.**

18 Grant such other and further relief as this Court may determine to be just and  
19 necessary.

20 Dated: September 27, 2023

21 /s/ Gary Y. Leung

22 GARY Y. LEUNG

23 ROBERTO A. TERCERO

24 Attorneys for Plaintiff

25 Securities and Exchange Commission  
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28