

3. Paragraph III of the Judgment provided, “[u]pon motion of the Commission, the Court shall determine whether it is appropriate to order a civil penal[t]y pursuant to Section 21A of the Exchange Act[.]”

4. The Commission is not seeking a civil penalty in this matter.

Now, therefore, the parties respectfully request that the Court enter the proposed order and Final Judgment as set forth below.

Respectfully submitted,

**SECURITIES AND EXCHANGE
COMMISSION**

/s/ Alfred A. Day
Alfred A. Day (BBO# 654436)
Martin F. Healey (BBO# 227550)
Asita Obeyesekere (DC Bar# 451637)
Nita Klunder (BBO# 689304)
Securities and Exchange Commission
Boston Regional Office
33 Arch Street, 24th Floor
Boston, MA 02110
(617) 573-4537

Attorneys for Plaintiff

BRUCH HANNA LLP

/s/ Sandra M. Hanna
Sandra M. Hanna (*pro hac vice*)
1099 New York Avenue, Suite 500
Washington, DC 20001
(202) 969-1630

Attorneys for Defendant

Dated: September 7, 2021

**[PROPOSED] ORDER ENTERING FINAL
JUDGMENT AS TO DEFENDANT MARK J. AHN**

Pursuant to the foregoing stipulation of the parties, the Court hereby orders as follows:

I.

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that Paragraph III of the Judgment (Dkt. No. 14) is stricken.

II.

IT IS FURTHER ORDERED ADJUDGED AND DECREED that the Judgment, as modified, is the Final Judgment in this matter.

Dated: 9/8/2021


UNITED STATES DISTRICT JUDGE