



**“III. NO “BAD ACTOR” DISQUALIFICATION**

Pursuant to 17 C.F.R. § 230.506(d)(2)(iii), the Court advises that “Bad Actor” disqualification under 17 C.F.R. § 230.506(d)(1) should not arise as a consequence of this Order.”

4. The parties are prepared to discuss the merits of this provision at the upcoming hearing. As part of their agreed resolution of this preliminary injunction, the SEC and Brunson will both defer and adhere to the Court’s ruling regarding the inclusion of this additional provision.

5. Further, during that hearing the receiver is prepared to update the Court on the status of the receivership.

Dated: December 10, 2021

Respectfully submitted,

**UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION**

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**CERTIFICATE OF SERVICE**

On December 10, 2021, I caused the foregoing filing to be transmitted to the following attorneys by email.

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