

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:12-cv-21656-JAL

SECURITIES AND EXCHANGE)
COMMISSION,)
)
Plaintiff,)
v.)
)
RECYCLE TECH, INC., KEVIN SEPE,)
RONNY J. HALPERIN, RYAN)
GONZALEZ, OTC SOLUTIONS LLC,)
ANTHONY THOMPSON, PUDONG LLC,)
JAY FUNG, and DAVID REES,)
)
Defendants,)
and)
)
CHARTER CONSULTING GROUP, INC.,)
)
Relief Defendant.)
_____)

**PLAINTIFF’S NOTICE OF FILING CONSENT OF RELIEF DEFENDANT
CHARTER CONSULTING GROUP, INC. AND REQUEST FOR ENTRY OF
FINAL JUDGMENT OF DISGORGEMENT AND OTHER RELIEF**

Plaintiff Securities and Exchange Commission files the signed Consent of Relief Defendant Charter Consulting Group, Inc. to entry of Final Judgment of Disgorgement and Other Relief. The Consent and the proposed Judgment are attached, and the Commission respectfully requests the Court enter the Judgment. The Consent and Judgment resolve all issues as to Relief Defendant Charter Consulting Group, Inc.

Respectfully submitted,

May 3, 2012

By: _____ /s James M. Carlson
James M. Carlson
Senior Trial Counsel
S.D. Florida Bar # A5501534
Telephone: (305) 982-6328
Facsimile: (305) 536-4154
E-mail: CarlsonJa@sec.gov

Attorney for Plaintiff
**SECURITIES AND EXCHANGE
COMMISSION**
801 Brickell Avenue, Suite 1800
Miami, Florida 33131
Telephone: (305) 982-6300
Facsimile: (305) 536-4154

CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2011, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel for records or *pro se* parties via the methods of service described below.

s/ James M. Carlson

Recycle Tech, Inc.
2039 NW 1st Place
Miami, FL 33127
(Not yet appeared)

Counsel for Recycle Tech, Inc.

Brad Lam
Lam Law Offices, LLC
1901 W. Littleton Blvd.
Littleton, CO 80120

Ryan Gonzalez
2039 NW 1st Place
Miami, FL 33127
(Not yet appeared)

Counsel for Ryan Gonzalez

Mark Hunter
Hunter Taubman Weiss, LLP
255 University Drive
Coral Gable, FL 33134

Kevin Sepe
17961 Biscayne Blvd., Suite B-1
Aventura, FL 33160
(Not yet appeared)

**Counsel for Kevin Sepe &
Charter Consulting Group, Inc.:**

David R. Chase
1700 East Las Olas Blvd., Ste 305
Ft. Lauderdale, FL 33301

Ronny Halperin
Ronny Halperin, PA
17961 Biscayne Blvd., Suite B-1
North Miami Beach, FL 33160
(Not yet appeared)

Counsel for Ronny J. Halperin

Richard Brodsky
66 W. Flagler Street, 9th Floor
Miami, Florida 33130

OTC Solutions LLC
4424 Montgomery Avenue, Ste. 201
Bethesda, MD 20814
(Not yet appeared)

Anthony J. Thompson, Jr.
4424 Montgomery Avenue, Ste. 201
Bethesda, MD 20814
(Not yet appeared)

Pudong LLC
900 North Federal Highway 200
Boca Raton, FL 33432
(Not yet appeared)

Jay Fung
900 North Federal Highway 200
Boca Raton, FL 33432
(Not yet appeared)

Counsel for David Rees:
Paul T. Moxley
111 East Broadway, 11th Floor
Salt Lake City, Utah 84111

Charter Consulting Group, Inc.
4770 Biscayne Blvd. Ste 1400
Miami, FL 33137
(Not yet appeared)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.

SECURITIES AND EXCHANGE)
 COMMISSION,)
)
 Plaintiff,)
 v.)
)
 [REDACTED] KEVIN SEPE,)
 [REDACTED])
)
 Defendants,)
 and)
)
 CHARTER CONSULTING GROUP, INC.)
)
 Relief Defendant.)
 _____)

**FINAL JUDGMENT AS TO RELIEF DEFENDANT
CHARTER CONSULTING GROUP, INC.**

The Securities and Exchange Commission having filed a Complaint and Relief Defendant Charter Consulting Group, Inc. having: entered a general appearance; consented to the Court's jurisdiction over it and the subject matter of this action; consented to entry of this Final Judgment without admitting or denying the allegations of the Complaint (except as to personal and subject matter jurisdiction, which Charter admits); waived findings of fact and conclusions of law; and waived any right to appeal from this Final Judgment:

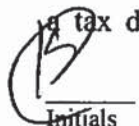


I.

DISGORGEMENT AND PREJUDGMENT INTEREST

IT IS ORDERED AND ADJUDGED that Charter is jointly and severally liable with Kevin Sepe for disgorgement of \$150,000, representing profits gained as a result of the conduct alleged in the Complaint, together with prejudgment interest thereon in the amount of \$9,125. The total amount, \$159,125, shall be due and payable within 14 days of entry of the Final Judgment. Payment shall be made by certified check, bank cashier's check, or United States postal money order payable to the Securities and Exchange Commission. The payment shall be delivered or mailed to the Office of Financial Management, Securities and Exchange Commission, 100 F Street, N E, Stop 6042, Washington DC 20549, and shall be accompanied by a letter identifying Charter as a defendant in this action; setting forth the title and civil action number of this action and the name of this Court; and specifying that payment is made pursuant to the Final Judgment. Charter shall simultaneously transmit photocopies of such payment and letter to James M. Carlson, Esq., Securities and Exchange Commission, 801 Brickell Avenue, Suite 1800, Miami, FL 33131. Charter shall pay post-judgment interest on any delinquent amounts pursuant to 28 USC § 1961. The Commission shall remit the funds paid pursuant to this paragraph to the United States Treasury.

Charter shall not seek or accept, directly or indirectly, reimbursement or indemnification from any source, including but not limited to payment made pursuant to any insurance policy, with regard to any civil penalty amounts that Charter pays pursuant to the Final Judgment, regardless of whether such penalty amounts or any part thereof are added to a distribution fund or otherwise used for the benefit of investors. Charter further shall not claim, assert, or apply for a tax deduction or tax credit with regard to any federal, state, or local tax for any penalty


Initials

amounts that Charter pays pursuant to the Final Judgment, regardless of whether such penalty amounts or any part thereof are added to a distribution fund or otherwise used for the benefit of investors.

II.

INCORPORATION OF CONSENT

IT IS FURTHER ORDERED AND ADJUDGED that the Consent is incorporated herein with the same force and effect as if fully set forth herein, and that Charter shall comply with all of the undertakings and agreements set forth therein.

III.

RETENTION OF JURISDICTION

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that this Court shall retain jurisdiction of this matter for the purposes of enforcing the terms of this Final Judgment.

Dated: _____, 2012

UNITED STATES DISTRICT JUDGE


Initials

amounts that Charter pays pursuant to the Final Judgment, regardless of whether such penalty amounts or any part thereof are added to a distribution fund or otherwise used for the benefit of investors.

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Dated: _____, 2012

UNITED STATES DISTRICT JUDGE