

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES SECURITIES AND  
EXCHANGE COMMISSION,

Plaintiff,

Case Number 09-12950  
Honorable David M. Lawson

v.

JOHN J. BRAVATA, RICHARD J.  
TRABULSY, ANTONIO M. BRAVATA,  
BBC EQUITIES, LLC, BRAVATA  
FINANCIAL GROUP, LLC, and SHARI A.  
BRAVATA,

Defendants.

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**AMENDED JUDGMENT**

In accordance with the opinion and order granting the plaintiff's motion for summary judgment entered on March 6, 2014, the consent of defendant Richard J. Trabulsy filed on June 27, 2013, and the order granting the government's motion to dismiss remaining claims and for entry of final judgment entered on this date,

It is **ORDERED AND ADJUDGED** that defendants John J. Bravata, Antonio M. Bravata, Richard J. Trabulsy, BBC Equities, LLC, and Bravata Financial Group, LLC, their agents, servants, employees, attorneys, and all persons in active concert or participation with them who receive actual notice of this Judgment by personal service or otherwise, are **PERMANENTLY RESTRAINED AND ENJOINED** from violating, directly or indirectly, Section 10(b) of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C. § 78j(b), and Rule 10b-5 promulgated thereunder, 17 C.F.R. § 240.10b-5, by using any means or instrumentality of interstate commerce, or of the mails,

or of any facility of any national securities exchange, in connection with the purchase or sale of any security:

- (a) to employ any device, scheme, or artifice to defraud;
- (b) to make any untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; or
- (c) to engage in any act, practice, or course of business which operates or would operate as a fraud or deceit upon any person.

It is **ORDERED AND ADJUDGED** that defendants John J. Bravata, Antonio M. Bravata, Richard J. Trabulsy, BBC Equities, LLC, and Bravata Financial Group, LLC, their agents, servants, employees, attorneys, and all persons in active concert or participation with them who receive actual notice of this Judgment by personal service or otherwise, are **PERMANENTLY RESTRAINED AND ENJOINED** from violating Section 17(a) of the Securities Act of 1933 (the “Securities Act”), 15 U.S.C. § 77q(a), in the offer or sale of any security by the use of any means or instruments of transportation or communication in interstate commerce or by use of the mails, directly or indirectly:

- (a) to employ any device, scheme, or artifice to defraud;
- (b) to obtain money or property by means of any untrue statement of a material fact or any omission of a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading; or
- (c) to engage in any transaction, practice, or course of business which operates or would operate as a fraud or deceit upon the purchaser.

It is **ORDERED AND ADJUDGED** that defendants John J. Bravata, Antonio M. Bravata, Richard J. Trabulsy, BBC Equities, LLC, and Bravata Financial Group, LLC, their agents, servants, employees, attorneys, and all persons in active concert or participation with them who receive actual notice of this Judgment by personal service or otherwise, are **PERMANENTLY RESTRAINED AND ENJOINED** from violating Section 5(a) and 5(c) of the Securities Act, 15 U.S.C. §§ 77e(a) and 77e(c), by, directly or indirectly, in the absence of any applicable exemption:

- (a) Unless a registration statement is in effect as to a security, making use of any means or instruments of transportation or communication in interstate commerce or of the mails to sell such security through the use or medium of any prospectus or otherwise;
- (b) Unless a registration statement is in effect as to a security, carrying or causing to be carried through the mails or in interstate commerce, by any means or instruments of transportation, any such security for the purpose of sale or for delivery after sale; or
- (c) Making use of any means or instruments of transportation or communication in interstate commerce or of the mails to offer to sell or offer to buy through the use or medium of any prospectus or otherwise any security, unless a registration statement has been filed with the Commission as to such security, or while the registration statement is the subject of a refusal order or stop order or (prior to the effective date of the registration statement) any public proceeding or examination under Section 8 of the Securities Act, 15 U.S.C. § 77h.

It is **ORDERED AND ADJUDGED** that defendants John J. Bravata, Antonio M. Bravata, Richard J. Trabulsy, BBC Equities, LLC, and Bravata Financial Group, LLC, their agents, servants, employees, attorneys, and all persons in active concert or participation with them who receive actual

notice of this Judgment by personal service or otherwise, are **PERMANENTLY RESTRAINED AND ENJOINED** from violating Section 15(a) of the Exchange Act, 15 U.S.C. § 77o(a), by making use of the mails or any means or instrumentality of interstate commerce to effect any transactions in, or to induce or attempt to induce the purchase or sale of, any security (other than an exempted security or commercial paper, bankers acceptances, or commercial bills), without registering with the Commission as a broker or dealer.

It is **ORDERED AND ADJUDGED** that defendants John J. Bravata and Shari Bravata, jointly and severally, pay to the United States Securities and Exchange Commission, for distribution according to further order of the Court, disgorgement of ill-gotten gains in the amount of \$5,201,494.89 that they received as proceeds of the BBC Equities scheme, plus prejudgment interest of \$1,251,074.02.

It is **ORDERED AND ADJUDGED** that defendant Antonio M. Bravata shall pay to the United States Securities and Exchange Commission, for distribution according to further order of the Court, disgorgement of ill-gotten gains in the amount of \$444,384 that he received as proceeds of the BBC Equities enterprise, plus prejudgment interest of \$98,474.14.

It is **ORDERED AND ADJUDGED** that defendant John J. Bravata pay to the United States Securities and Exchange Commission a civil penalty pursuant to Section 20(d) of the Securities Act, 15 U.S.C. § 77t(d), and Section 21(d)(3) of the Exchange Act, 15 U.S.C. § 78u(d)(3), in the amount of \$1,820,000.

It is **ORDERED AND ADJUDGED** that defendant Antonio M. Bravata pay to the United States Securities and Exchange Commission a civil penalty pursuant to Section 20(d) of the

Securities Act, 15 U.S.C. § 77t(d), and Section 21(d)(3) of the Exchange Act, 15 U.S.C. § 78u(d)(3), in the amount of \$130,000.

It is **ORDERED AND ADJUDGED** that defendant Richard J. Trabulsy, pay to the United States Securities and Exchange Commission a civil penalty pursuant to Section 20(d) of the Securities Act, 15 U.S.C. § 77t(d), and Section 21(d)(3) of the Exchange Act, 15 U.S.C. § 78u(d)(3), in the amount of \$130,000.

It is **ORDERED AND ADJUDGED** that this Court will retain jurisdiction of this matter for the purpose of enforcing the terms of this Judgment.

It is further **ORDERED AND ADJUDGED** that the complaint in all other respects is **DISMISSED WITH PREJUDICE**.

s/David M. Lawson  
DAVID M. LAWSON  
United States District Judge

Dated: May 29, 2014

**PROOF OF SERVICE**

The undersigned certifies that a copy of the foregoing order was served upon each attorney or party of record herein by electronic means or first class U.S. mail on May 29, 2014.

s/Shawntel Jackson  
SHAWNTEL JACKSON