

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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Securities and Exchange Commission, :
: :
Plaintiff, :
: :
- against - :
: :
Sandra Venetis, Systematic Financial Services, Inc., :
Systematic Financial Associates, Inc., and Systematic :
Financial Services, LLC, :
: :
Defendants, :
: :
- and - :
: :
Venetis LLC, Jennifer Venetis, and Kevin Persley, :
: :
Relief Defendants. :
: :
-----X

**10 Civ. 4493 (JAP)
ECF Case**

R E C E I V E D

MAR 13 2012

**AT 8:30 _____ M
WILLIAM J. WELSH
CLERK**

~~PROPOSED~~ FINAL JUDGMENT

WHEREAS, on September 2, 2010, the Court permanently enjoined defendants Sandra Venetis, Systematic Financial Services, Inc., Systematic Financial Associates, Inc., and Systematic Financial Services, LLC (collectively, "Defendants") from violating Sections 5 and 17(a) of the Securities Act of 1933 ("Securities Act"), Section 10(b) of the Securities Exchange Act of 1934 ("Exchange Act") and Rule 10b-5 thereunder; permanently enjoined defendants Sandra Venetis and Systematic Financial Associates, Inc. from violating Sections 206(1) and 206(2) of the Investment Advisers Act of 1940 ("Advisers Act"); and further ordered Defendants to pay disgorgement, prejudgment interest, and civil penalties, and relief defendant Venetis LLC to pay disgorgement plus

prejudgment interest, in amounts to be determined by the Court upon motion of the Commission;

WHEREAS, on October 1, 2010, the Court appointed Joshua Markowitz as receiver for the purposes of marshaling and preserving all assets of Defendants and relief defendant Venetis LLC;

WHEREAS, defendant Sandra Venetis has entered a plea of guilty in the related criminal action, United States v. Sandra Venetis, 11-cr-278 (D.N.J.), and has been sentenced to incarceration and to pay restitution of \$11,547,935; and

WHEREAS, defendants Systematic Financial Services, Inc., Systematic Financial Associates, Inc., and Systematic Financial Services, LLC and relief defendant Venetis LLC, through their attached consent ("Consent"), have consented to entry of this Final Judgment;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:

I.

The SEC's claims for monetary relief pursuant to Section 20(d) of the Securities Act, Section 21(d)(3) of the Exchange Act, and Section 209(e) of the Advisers Act against defendants Sandra Venetis, Systematic Financial Services, Inc., Systematic Financial Associates, Inc., and Systematic Financial Services, LLC, and against relief defendant Venetis LLC are hereby dismissed.

II.

The SEC's claims against relief defendants Jennifer Venetis and Kevin Persley are hereby dismissed.

III.

The Court's prior judgment, dated September 2, 2010, entering permanent injunctions against Defendants is incorporated in full, with the exception of Paragraph V ordering payment of disgorgement, prejudgment interest, and civil money penalties, into this Final Judgment.


IV.

Defendants Systematic Financial Services, Inc., Systematic Financial Associates, Inc., and Systematic Financial Services, LLC and relief defendant Venetis LLC's Consent to the entry of this Final Judgment is incorporated herein with the same force and effect as if fully set forth herein.

V.

This Court shall retain jurisdiction of this matter for the purposes of enforcing the terms of this Final Judgment.

Dated: March 13, 2012



The Honorable Joel Pisano
United States District Judge