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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

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12 Securities and Exchange Commission,
13 Plaintiff,
14 vs.
15 Abhi Batra a/k/a Abhimanyu Batra,
16 Defendant.
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Case No.

COMPLAINT

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19 Plaintiff Securities and Exchange Commission (“SEC”) alleges:

20 **JURISDICTION AND VENUE**

21 1. The Court has jurisdiction over this action pursuant to Sections
22 21(d)(1), 21(d)(3)(A), 21(e) and 27(a) of the Securities Exchange Act of 1934
23 (“Exchange Act”), 15 U.S.C. §§ 78u(d)(1), 78u(d)(3)(A), 78u(e) & 78aa(a).

24 2. Defendant has, directly or indirectly, made use of the means or
25 instrumentalities of interstate commerce, of the mails, or of the facilities of a
26 national securities exchange in connection with the transactions, acts, practices and
27 courses of business alleged in this complaint.

28 3. Venue is proper in this district pursuant to Section 27(a) of the

1 Exchange Act, 15 U.S.C. § 78aa(a), because certain of the transactions, acts,
2 practices and courses of conduct constituting violations of the federal securities
3 laws occurred within this district. In addition, venue is proper in this district
4 because Defendant resides in this district.

5 **SUMMARY**

6 4. This action involves a fraudulent “free-riding” securities trading
7 scheme perpetrated by Defendant Abhi Batra a/k/a Abhimanyu Batra (“Batra”),
8 which allowed Batra to trade risk-free and avoid losses from his trading in
9 securities in the form of options from June 2016 through January 2020. “Free-
10 riding” generally involves the purchase and sale of securities without paying for
11 them.

12 5. Batra carried out his free-riding scheme by depositing money from
13 bank accounts to brokerage accounts via Automated Clearing House (“ACH”)
14 transfers. Batra used the funds to purchase securities in the form of options
15 contracts. After he completed his trades, Batra recalled the ACH transfers by
16 falsely representing to banks that he did not authorize the ACH transfers. Batra’s
17 actions caused the banks to pull back the funds from the brokerage firms, leaving
18 the brokerage firms with losses. Batra recalled funds when his trading was not
19 profitable, as well as when it was profitable. When Batra’s trading was profitable,
20 he withdrew his trading profits, and at times recalled the ACH transfers, leaving a
21 negative balance in the account.

22 6. When brokerage firms discovered Batra’s fraud, they imposed trading
23 restrictions on him. To evade these restrictions, Batra opened and/or used
24 brokerage accounts in the names of six nominees, consisting of family and friends.
25 Batra concealed from the brokerage firms the fact that he was opening and
26 accessing the brokerage accounts in the names of other persons, to continue his
27 fraudulent free-riding scheme.

28 7. In addition, Batra made misstatements of material facts, and failed to

1 disclose material information necessary to make the statements as made true.
2 Batra made material misstatements to the banks in connection with his recall of
3 ACH transfers, by falsely claiming various reasons that the transfer was not
4 authorized, while failing to disclose that Batra had, in fact, authorized and made
5 each ACH transfer. Batra also made material misstatements in his
6 communications with brokerage firms, including by depositing funds for the
7 purpose of trading without disclosing that he intended to recall the funds, and by
8 impersonating others to conceal his involvement in using certain accounts to trade.

9 8. Between June 2016 and January 2020, Batra opened or accessed 44
10 accounts in his name and the names of six nominees, at 14 different brokerage
11 firms. In total, Batra purchased more than \$8 million in options contracts in these
12 accounts. Batra recalled over \$1 million in ACH transfers.

13 9. Batra's trading was largely unprofitable, and the brokerage firms
14 incurred losses estimated at \$665,000, which was comprised of approximately
15 \$557,000 in trading losses, \$10,000 in unpaid fees and other charges, and \$98,000
16 in profits that Batra withdrew from the accounts during the course of the scheme.

17 10. By this conduct, Batra violated Section 10(b) of the Exchange Act [15
18 U.S.C. §§ 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5]. The SEC
19 requests that the Court make findings of facts and conclusions of law that
20 Defendant engaged in the alleged conduct, and seeks permanent injunctive relief
21 including conduct-based injunctions, disgorgement, prejudgment interest, and civil
22 penalties against the Defendant.

23 **THE DEFENDANT**

24 11. Defendant **Abhi Batra a/k/a Abhimanyu Batra**, age 33, is a resident
25 of Los Angeles, California.

26 **THE ALLEGATIONS**

27 **A. Batra Engaged in a Fraudulent Free-Riding Trading Scheme**

28 12. Batra engaged in the fraudulent free-riding scheme from at least June

1 2016 through January 2020.

2 13. Batra's scheme operated as follows: Batra would transfer money
3 from bank accounts in his name or which he held jointly with others, via ACH
4 transfer, to brokerage accounts in his name or which he controlled. Batra then
5 used the funds to engage in the purchase and sale of speculative options contracts
6 in the brokerage accounts. After engaging in trading, Batra would recall the ACH
7 transfer by claiming that the transfer was unauthorized.

8 14. Batra recalled the initial deposits when his securities trading resulted
9 in losses. Batra successfully recalled over \$1 million in ACH transfers that he had
10 made. Batra's fraudulent conduct left the brokerage firms with approximately
11 \$557,000 in trading losses and \$10,000 in unpaid fees and expenses in the
12 brokerage accounts he used.

13 15. At times Batra also recalled the initial deposits when his securities
14 trading resulted in profits. In such cases, prior to recalling the ACH deposits, Batra
15 transferred his trading profits out of the account. Batra thus profited by keeping
16 the trading profits, and recalling the amounts used to generate those profits. Batra
17 withdrew approximately \$98,000 in net trading profits during his fraudulent
18 activities.

19 16. Batra modified his scheme over time, as brokerage firms identified
20 him as engaging in fraudulent free-riding trading activities and as he incurred
21 negative balances in brokerage accounts in his name.

22 17. Initially, Batra engaged in the free-riding scheme in brokerage
23 accounts in his name. When these brokerage firms discovered that Batra was
24 recalling ACH transfers after he had used the funds to trade, they placed fraud
25 restrictions on the accounts and/or closed the accounts. At times, brokerage firms
26 placed restrictions on accounts before Batra was able to purchase or sell securities.

27 18. To avoid the trading restrictions and evade detection, Batra: (1)
28 opened accounts in his name at other brokerage firms that he had not yet

1 victimized, and (2) opened nominee accounts in the names of friends and family,
2 sometimes at brokerage firms that had restricted his activities.

3 19. Between March 2018 and January 2020, Batra used brokerage
4 accounts in the names of six nominees to perpetrate his free-riding scheme.

5 20. Batra opened and used some accounts with the permission of the
6 individuals whose names were on the accounts.

7 21. Batra opened and used some accounts in the names of other
8 individuals without their knowledge or permission.

9 22. Batra attempted to conceal his identity from the brokerage firms when
10 he used accounts held in the name of nominees. Batra used some of his personal
11 information, such as his telephone number or email address, for these accounts,
12 thus tying him to the accounts.

13 23. When brokerage firms learned that Batra was accessing the accounts
14 of others, for example by connecting Batra's personal information or internet
15 protocol address ("IP Address") to the accounts, the brokerage firms placed fraud
16 restrictions on the accounts or closed the accounts.

17 24. The following chart shows the time frames for which Batra used the
18 identities of six nominees in his free-riding scheme:

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<u>Account Holder</u>	<u>Dates Accounts Used</u>
Abhi Batra	June 2016 – Dec 2019
Individual A	Mar 2018 – July 2018
Individual B	May 2018 – Feb 2019
Individual C	Dec 2018 – Jan 2020
Individual D	Mar 2019 – July 2019
Individual E	Mar 2019 – Dec 2019
Individual F	June 2019 – Dec 2019

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28 25. In the accounts in his name and in the nominee accounts, Batra

1 primarily purchased securities in the form of options contracts on securities of
2 Tesla, Nvidia, Netflix, and Amazon.

3 26. Between June 2016 and January 2020, Batra purchased more than \$8
4 million in securities, in 44 different accounts at 14 different brokerage firms.

5 **1. Batra's fraudulent activity in accounts in his name**

6 27. Batra perpetrated his fraudulent free-riding scheme in brokerage
7 accounts in his name. Between June 2016 and December 2019, Batra fraudulently
8 recalled ACH transfers in 7 accounts in his name at 7 different brokerages. Batra
9 recalled the ACH transfers after he had used the money to purchase securities, both
10 when his trading was unprofitable and when it was profitable.

11 28. As an example, Batra opened an account in his name at Brokerage A
12 on or about February 1, 2018. Between approximately February 2 and February
13 26, 2018, Batra transferred a total of \$55,000 via ACH from bank accounts in his
14 name into his brokerage account at Brokerage A.

15 29. Between February 2 and March 6, 2018, Batra used the \$55,000 on
16 deposit to purchase Nvidia and Tesla options contracts.

17 30. The options positions were closed by March 19, 2020, and resulted in
18 approximately \$54,000 in losses.

19 31. Between approximately March 19 and March 21, 2018, Batra caused
20 his bank to recall the entire \$55,000 in ACH transfers that he had already used for
21 his unsuccessful options trading.

22 32. Batra's recall of the ACH deposits he had made into the brokerage
23 account caused a negative balance of over \$55,000 in his account at Brokerage A.

24 33. Batra's fraudulent conduct caused Brokerage A to incur \$55,000 in
25 losses connected to Batra's trading, while he was able wrongfully to recoup the
26 \$55,000 that he had used to purchase the options.

27 34. Brokerage A closed Batra's account on or about March 21, 2018.

28 35. In another example, Batra opened an account in his name at

1 Brokerage B on or about October 11, 2019.

2 36. On or about October 16, 2019, Batra deposited \$30,000 via ACH from
3 his bank account into his brokerage account at Brokerage B.

4 37. Between approximately October 17 and October 22, 2019, Batra used
5 the \$30,000 on deposit to purchase options contracts in the securities of Netflix.

6 38. The options positions were closed by October 25, 2019. Batra's
7 trading resulted in profits of more than \$13,000. By the end of October 2019,
8 Batra's account balance was approximately \$43,000.

9 39. On or about November 19, 2019, Batra withdrew the \$43,000
10 (\$30,000 initial deposit plus \$13,000 in trading profits) from the account at
11 Brokerage B to one of his bank accounts.

12 40. On or about December 2, 2019, Batra caused his bank to recall the
13 initial \$30,000 ACH transfer to the account at Brokerage B.

14 41. By recalling the \$30,000, Batra was able to recoup the money that he
15 had used to trade, while still keeping the profits from his trading.

16 42. Batra's recall of the \$30,000 initial deposit caused a negative balance
17 of approximately \$30,000 in his account at Brokerage B.

18 **2. Batra's use of accounts in the name of third parties for his scheme**

19 43. Batra also perpetrated his free-riding scheme in accounts in the names
20 of six other individuals. Some of those individuals permitted Batra to open and/or
21 access accounts in their names. Other individuals were unaware of and did not
22 authorize Batra to open and use brokerage accounts in their names.

23 44. From March 2018 through January 2020, Batra opened and/or
24 accessed 32 brokerage accounts in the names of the six nominees. During this
25 period, Batra made deposits of approximately \$900,000 into these brokerage
26 accounts via ACH transfers, and subsequently recalled those ACH transfers on
27 fraudulent bases.

28 45. Some of the individuals gave Batra permission to trade in certain

1 accounts in their name.

2 46. For example, Individual B permitted Batra to trade in certain accounts
3 in her name, which he used for his free-riding scheme. Batra then opened
4 additional accounts in Individual B's name without her knowledge, and used those
5 accounts in his free-riding scheme.

6 47. On other occasions, Batra misappropriated personal information of
7 others, which he used to open or use accounts in their name. Batra impersonated
8 those other individuals to carry out the scheme in accounts in their names.

9 48. For example, Individual E did not authorize Batra to open or use
10 accounts in his name. Yet, Batra opened three brokerage accounts in the name of
11 Individual E, and took control of a fourth, existing account, without Individual E's
12 knowledge or consent. Batra used these accounts in his free-riding scheme.

13 49. When Batra opened and/or used accounts in the names of nominees,
14 Batra deliberately tried to conceal his association with the accounts from the
15 brokerage firms to evade restrictions on trading imposed by the brokerage firms.

16 50. For example, Batra used an account in his own name at Brokerage A,
17 until Brokerage A shut down his account and restricted his activity. Batra
18 subsequently opened an account at Brokerage A in the name of Individual E.

19 51. Individual E was unaware of and did not authorize Batra to open an
20 account in his name at Brokerage A.

21 52. Batra concealed from Brokerage A that he had opened and was
22 controlling the account in the name of Individual E, by providing false information
23 and documents to Brokerage A, including a falsified utility bill in the name of
24 Individual E.

25 53. In or about June 2019, Batra also completed and submitted documents
26 to Brokerage A falsely attesting that he was Individual E.

27 54. In another example, Batra opened an account at Brokerage C in
28 Individual E's name without the consent or knowledge of Individual E.

1 55. In order to link Batra’s bank account to the brokerage account at
2 Brokerage C in the name of Individual E, Batra falsified his bank statement by
3 adding Individual E’s name to the statement to make it appear that Individual E
4 was a joint account holder. At no time was Individual E a joint account holder on
5 the bank account.

6 56. On or about August 8, 2019, Batra also falsely stated that he was
7 Individual E on a call with Brokerage C.

8 57. Despite Batra’s efforts to conceal his control of the accounts in the
9 names of the six individuals, the accounts contain information linking Batra to
10 them.

11 58. For example, Batra opened and accessed many of the nominee
12 accounts from IP Addresses belonging to Batra, including 172.248.35.224 and
13 70.187.162.204. Accounts at Brokerage D in the names of Batra, Individual A,
14 and Individual B were all opened using IP Address 70.187.162.204. This IP
15 Address was also used to make trades in all three of the accounts.

16 59. As discussed in more detail below, Batra’s IP Addresses also accessed
17 certain nominee accounts on the dates that ACH transfers—which Batra
18 subsequently reported as unauthorized—were made.

19 60. Account applications and other records for the nominee accounts also
20 contain personal information belonging to Batra. For example, Batra provided his
21 phone number and/or email addresses associated with him as the contact
22 information for accounts in the names of all six nominees.

23 61. Through Batra’s deliberate deception of the brokerage firms as to who
24 was controlling the accounts in the names of the six nominees, he was able to carry
25 out the free-riding scheme in accounts in their names.

26 **B. Batra Made Materially False and Misleading Statements to Banks and**
27 **Brokerage Firms, and Omitted Material Information**

28 62. From at least June 2016 through January 2020, Batra made numerous

1 materially false and misleading statements to banks and brokerage firms, and
2 omitted material information necessary to make the statements made otherwise not
3 misleading.

4 63. Batra falsely stated to banks where he held accounts that he had not
5 authorized the ACH deposits to brokerage firms. Batra took advantage of ACH
6 regulations designed to protect consumers that allow a customer to order a recall
7 for up to 60-days where they are victims of fraud. Batra made numerous, different
8 false statements in recorded calls and written forms submitted to his banks to cause
9 the banks to recall the ACH transfers. In addition, Batra omitted to disclose
10 material information to the banks that he had authorized and made the ACH
11 transfers, that he was now claiming were fraudulent. Batra made these material
12 misstatements and omissions to banks in connection with his purchase and sale of
13 securities in the brokerage accounts.

14 64. Batra caused the banks to recall the funds he had deposited with
15 brokerage firms by falsely stating that he was a victim of fraud and had not
16 authorized the initial ACH transfer.

17 65. Batra caused banks to recall funds he had deposited with brokerage
18 firms by falsely stating that his account had been hacked.

19 66. Batra caused banks to recall funds he had deposited with brokerage
20 firms by falsely stating that he did not know the beneficiaries of his funds.

21 67. Batra caused banks to recall funds he had deposited with brokerage
22 firms by falsely stating that he did not do business with the brokerage firms that
23 had received his funds.

24 68. Batra caused banks to recall funds he had deposited with brokerage
25 firms by falsely stating that an unknown thief had used his bank account
26 information.

27 69. In fact, Batra made the ACH transfers by depositing money with the
28 brokerage firms. Batra used that money to trade, and then fraudulently caused the

1 banks to recall the funds by presenting himself as a victim of theft.

2 70. Batra's IP Addresses were used to access the brokerage accounts and
3 make transfers.

4 71. Some examples of Batra's material misstatements and omissions to
5 banks are:

6 (a) In or about February 2018, Batra called Brokerage A and stated
7 that he had opened an account in his name, made a deposit of \$10,000, and wanted
8 to trade options. Batra then used the \$10,000 to trade. Batra also deposited
9 additional money into this account using ACH transfers. Batra incurred losses in
10 this trading account at this time. Batra then submitted a form to his bank falsely
11 representing that he "did not authorize the Originator to debit my account" and
12 asking them to recall the funds. Batra omitted material information that he had
13 actually authorized and made the transaction.

14 (b) On or about March 26, 2019, Batra accessed from his IP
15 Address an account in the name of Individual C at Brokerage D. Batra then
16 transferred \$10,000 via ACH from his bank account into Individual C's account at
17 Brokerage D. Batra used those funds to purchase options contracts in the account.
18 Batra subsequently contacted his bank and requested that the bank recall the
19 \$10,000 ACH deposit (and other deposits he made). Batra falsely represented to
20 his bank that his bank account information had been compromised and someone
21 made the transfer without his authorization.

22 (c) On or about August 8, 2019, Batra called Brokerage C and
23 falsely represented that he was Individual E, and discussed money that had been
24 transferred into the account and options trades that he planned to make. Over the
25 next several months, Batra deposited additional funds from his bank account into
26 Individual E's brokerage account at Brokerage C. Batra used the funds to purchase
27 and sell options contracts. Batra's trading in the account was not profitable. In or
28 about December 2019, Batra contacted his bank and requested that it recall the

1 ACH transfers, and falsely stated that he had never done business with Brokerage
2 C and did not authorize the transfer of funds to Brokerage C. Batra omitted
3 material information that he had authorized the ACH deposits and used the funds
4 to trade in Individual E's brokerage account.

5 (d) On or about November 29, 2019, Batra accessed Individual E's
6 account at Brokerage E from his IP Address. Batra then authorized a \$30,000
7 ACH deposit from his bank account into Individual E's brokerage account at
8 Brokerage E on or about the same date. On December 10, 2019, Batra contacted
9 his bank to recall the transfer, and falsely stated on a recorded call that he did not
10 know Individual E, had never dealt with Brokerage E, and did not transfer the
11 funds to Individual E's account at Brokerage E. Batra omitted material
12 information that he had authorized the transfer and used the funds to trade in
13 Individual E's brokerage account.

14 72. Batra made material misrepresentations of material fact, and omitted
15 material information necessary to make the statements not misleading, to
16 brokerage firms in connection with his purchase and sale of securities.

17 73. Batra deposited funds into his accounts at brokerage firms, and in so
18 doing represented that those funds were available to pay for his trading. Batra
19 failed to disclose to the brokerage firms that he intended to recall his ACH
20 deposits, thus causing losses to the brokerage firms.

21 74. Batra made materially false and misleading statements to brokerage
22 firms when he opened and accessed accounts in the names of nominees, in an
23 effort to conceal his involvement with the accounts and evade trading restrictions
24 imposed on him by the brokerage firms. Batra omitted material information that
25 he was the principal depositing funds and trading securities in the accounts held in
26 the name of these third parties.

27 75. Batra made materially false and misleading statements to brokerage
28 firms when he falsely represented that he was the individual who owned the

1 account, and intentionally hid his identity. He omitted material information as to
2 his true identity.

3 **C. Batra Acted With a High Level of Scierter**

4 76. Batra acted with a high level of scierter.

5 77. Batra intentionally deceived brokerage firms where he held accounts
6 in his name by representing that funds he deposited using ACH transfers were
7 available to pay for his trading. Batra intentionally defrauded those brokerage
8 firms by recalling the deposits, thus causing the brokerage firms to pay for Batra's
9 trading and assume his losses.

10 78. Batra also intentionally deceived banks by making false claims to
11 support his requests to recall ACH transfers.

12 79. Batra intentionally deceived brokerage firms by opening accounts in
13 the names of six nominees, to conceal his identity and involvement in the accounts,
14 and evade trading restrictions.

15 80. Batra also intentionally deceived banks by making false claims to
16 support his requests to recall ACH transfers he had made to brokerage accounts
17 held in the names of the nominees.

18 81. Batra's fraudulent conduct caused brokerage firms to incur losses in
19 excess of \$665,000, consisting of approximately \$557,000 in trading losses that
20 Batra wrongfully avoided by recalling ACH transfers; \$10,000 in unpaid fees and
21 other expenses incurred in the accounts in which Batra carried out the free-riding
22 scheme; and \$98,000 in trading profits that Batra withdrew from the accounts.

23 82. Batra used means and instrumentalities of interstate commerce, such
24 as wire transfers of funds using the ACH system, telephones, the internet, and
25 national securities exchanges, to accomplish his fraud.

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1 **FIRST CLAIM FOR RELIEF**

2 **Fraud in Connection with the Purchase or Sale of Securities**

3 **Violations of Section 10(b) of the Exchange Act and Rules 10b-5(a) and (c)**

4 83. Paragraphs 1 through 82 are realleged and incorporated by reference.

5 84. By reason of the conduct described above, in particular paragraphs 12
6 through 61 and 76 through 82, Defendant Batra, directly or indirectly, with
7 scienter, in connection with the purchase or sale of securities, by use of the means
8 or instrumentalities of interstate commerce or the facilities of a national securities
9 exchange or the mail: (a) employed devices, schemes, or artifices to defraud; and
10 (c) engaged in acts, practices, or courses of business which operated or would
11 operate as a fraud or deceit upon other persons.

12 85. By engaging in the conduct described above, Defendant Batra
13 violated, and unless restrained and enjoined will continue to violate, Section 10(b)
14 of the Exchange Act, 15 U.S.C. § 78j(b), and Rules 10b-5(a) and (c) thereunder, 17
15 C.F.R. §§ 240.10b-5(a) and (c).

16 **SECOND CLAIM FOR RELIEF**

17 **Fraud in Connection with the Purchase or Sale of Securities**

18 **Violations of Section 10(b) of the Exchange Act and Rule 10b-5(b)**

19 86. Paragraphs 1 through 82 are realleged and incorporated by reference.

20 87. By reason of the conduct described above, in particular paragraphs 62
21 through 82, Defendant Batra, directly or indirectly, in connection with the purchase
22 or sale of securities, by use of the means of instrumentalities of interstate
23 commerce or of the mails, or of any facility of any national securities exchange,
24 with scienter, made untrue statements of material fact or omitted to state material
25 facts necessary in order to make the statements made, in light of the circumstances
26 under which they were made, not misleading.

27 88. By engaging in the conduct described above, Defendant Batra
28 violated, and unless restrained and enjoined will continue to violate, Section 10(b)

1 of the Exchange Act, 15 U.S.C. § 78j(b), and Rule 10b-5(b) thereunder, 17 C.F.R.
2 §§ 240.10b-5(b).

3 **PRAYER FOR RELIEF**

4 WHEREFORE, the SEC respectfully requests that the Court:

5 **I.**

6 Issue findings of fact and conclusions of law that Defendant committed the
7 alleged violations.

8 **II.**

9 Issue judgments, in forms consistent with Rule 65(d) of the Federal Rules of
10 Civil Procedure, permanently enjoining Defendant Batra and his officers, agents,
11 servants, employees and attorneys, and those persons in active concert or
12 participation with any of them, who receive actual notice of the judgment by
13 personal service or otherwise, and each of them, from violating Section 10(b) of
14 the Exchange Act [15 U.S.C. §§ 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. §
15 240.10b-5]; and permanently enjoining Defendant Batra and his officers, agents,
16 servants, employees and attorneys, and those persons in active concert or
17 participation with any of them, who receive actual notice of the judgment by
18 personal service or otherwise, and each of them, from (1) directly or indirectly
19 opening a brokerage account without first providing to the brokerage firm a copy
20 of the complaint filed in this matter and any resulting judgment, and (2) directly or
21 indirectly accessing any brokerage account of any third-party, including doing so
22 with the consent of the account holder, without first providing to the brokerage
23 firm a copy of the complaint filed in this matter and any resulting judgment.

24 **III.**

25 Order Defendant Batra to disgorge all funds received from his illegal
26 conduct, together with prejudgment interest thereon.

27 **IV.**

28 Order Defendant Batra to pay civil penalties under Section 21(d)(3) of the

1 Exchange Act [15 U.S.C. § 78u(d)(3)].

2 **V.**

3 Retain jurisdiction of this action in accordance with the principles of equity
4 and the Federal Rules of Civil Procedure in order to implement and carry out the
5 terms of all orders and decrees that may be entered, or to entertain any suitable
6 application or motion for additional relief within the jurisdiction of this Court.

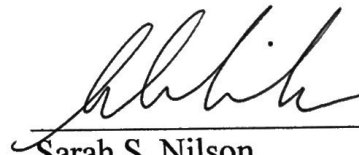
7 **VI.**

8 Grant such other and further relief as this Court may determine to be just and
9 necessary.

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11 Dated: January 15, 2021

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Sarah S. Nilson
John B. Bulgozdy
Attorneys for Plaintiff
Securities and Exchange Commission

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