

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 89139 / June 24, 2020

ADMINISTRATIVE PROCEEDING
File No. 3-19832

In the Matter of

TODD H. LAHR, ESQ.,

Respondent.

**ORDER INSTITUTING ADMINISTRATIVE
PROCEEDINGS PURSUANT TO RULE 102(e)
OF THE COMMISSION'S RULES OF
PRACTICE, MAKING FINDINGS, AND
IMPOSING REMEDIAL SANCTIONS**

I.

The Securities and Exchange Commission (“Commission”) deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted against Todd H. Lahr, Esq. (“Lahr” or “Respondent”) pursuant to Rule 102(e)(3)(i) of the Commission’s Rules of Practice.¹

II.

In anticipation of the institution of these proceedings, Respondent has submitted an Offer of Settlement (the “Offer”) which the Commission has determined to accept. Solely for the purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, Respondent admits the Commission’s jurisdiction over him and the subject matter of these proceedings, and the findings contained in Sections III.2. and III.4 below, and consents to the entry of this Order Instituting Administrative

¹ Rule 102(e)(3)(i) provides, in relevant part, that:

The Commission, with due regard to the public interest and without preliminary hearing, may, by order, . . . suspend from appearing or practicing before it any attorney . . . who has been by name (A) [p]ermanently enjoined by any court of competent jurisdiction, by reason of his or her misconduct in an action brought by the Commission, from violating or aiding and abetting the violation of any provision of the Federal securities laws or of the rules and regulations thereunder; or (B) [f]ound by any court of competent jurisdiction in an action brought by the Commission to which he or she is a party . . . to have violated (unless the violation was found not to have been willful) or aided and abetted the violation of any provision of the Federal securities laws or of the rules and regulations thereunder.

Proceedings Pursuant to Rule 102(e) of the Commission’s Rules of Practice, Making Findings, and Imposing Remedial Sanctions (“Order”), as set forth below.

III.

On the basis of this Order and Respondent’s Offer, the Commission finds that:

1. Lahr, age 60, resides in Nazareth, Pennsylvania. Lahr has been licensed to practice law in the Commonwealth of Pennsylvania since 1987. From 2008 to 2010, Lahr was associated with an investment adviser registered with the Commission.
2. On March 24, 2020, the Commission filed a complaint against Lahr in *SEC v. Lahr, et al.* (Civil Action No. 20-1593) in the United States District Court for the Eastern District of Pennsylvania. On June 23, 2020, the court entered an order permanently enjoining Lahr by consent, from future violations of Sections 5(a), 5(c), and 17(a) of the Securities Act of 1933, and Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5 thereunder.
3. The Commission’s complaint alleged, among other things, that from at least 2014 through 2017, Lahr knowingly orchestrated and operated an offering fraud and Ponzi scheme through which he raised over \$1.4 million in investor funds from the unregistered sale of securities consisting of promissory notes in THL Holdings, LLC (“THL Holdings”) and common stock and warrants in Ferran Global Holdings, Inc. (“Ferran”). Lahr misappropriated a substantial portion of those funds, using almost \$400,000 to pay earlier investors in a Ponzi scheme, and at least \$130,000 for personal expenses and other expenses unrelated to THL Holdings’ and Ferran’s purported investments.
4. On April 23, 2020, Lahr pleaded guilty to one count of conspiracy to commit securities and wire fraud in violation of 18 U.S.C. § 371, two counts of securities fraud in violation of Section 10(b) of the Exchange Act and Rule 10b-5 thereunder, and four counts of wire fraud in violation of 18 U.S.C. § 1343 before the United States District Court for the Eastern District of Pennsylvania, in *United States v. Todd H. Lahr* (Criminal Action No. 5:19-cr-496).

IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanction agreed to in Respondent Lahr's Offer.

Accordingly, it is hereby ORDERED pursuant to Rule 102(e)(3)(i) of the Commission's Rules of Practice, effective immediately, that:

A. Lahr is suspended from appearing or practicing before the Commission as an attorney.

By the Commission.

Vanessa A. Countryman
Secretary