UNITED STATES OF AMERICA before the SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934 Release No. 84154 / September 17, 2018

Admin. Proc. File No. 3-14949
In the Matter of
CILL DI FIG. M. M. MCMM
CHARLES M. VAUGHN

ORDER VACATING INVESTMENT ADVISER, MUNICIPAL SECURITIES DEALER, AND TRANSFER AGENT BARS

Charles M. Vaughn seeks to vacate an order, dated October 25, 2012 (the "Order"), to the extent that it bars him from association with an investment adviser, municipal securities dealer, or transfer agent.¹ The bars at issue were imposed based solely on conduct occurring prior to July 22, 2010, the effective date of the Dodd-Frank Wall Street Reform and Consumer Protection Act.² Accordingly, in our discretion, we vacate the Order to the extent it prohibits Charles M. Vaughn from associating with an investment adviser, municipal securities dealer, or transfer agent, but otherwise leave the Order unmodified.

By the Commission.

Brent J. Fields Secretary

See Charles M. Vaughn, Securities Exchange Act Release No. 68106, 2012 WL 5267988 (Oct. 25, 2012). We previously vacated bars from associating with a municipal advisor and a nationally recognized statistical rating organization that were imposed in the Order. *Charles M. Vaughn*, Exchange Act Release No. 77944, 2016 WL 3030841 (May 27, 2016).

² See Bartko v. SEC, 845 F.3d 1217, 1225 (D.C. Cir. 2017); Commission Statement Regarding Decision in Bartko v. SEC (Feb. 23, 2017), available at https://www.sec.gov/news/statement/commission-statement-regarding-bartko-v-sec.html.