UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION, Plaintiff, v. GUY ROBERT ELLIOTT, Defendant.	No. 17-CV-7994 (AT)

JOINT STIPULATION TO DISMISS, AND RELEASES

Plaintiff Securities and Exchange Commission (the "Commission" or the "SEC") and Defendant Guy Robert Elliott (the "Defendant") respectfully submit this joint stipulation.

WHEREAS, the Commission filed its complaint in this civil enforcement action (the "Litigation") on October 17, 2017.

WHEREAS, the Commission now seeks to dismiss this case in the exercise of its discretion.

WHEREAS, the Commission's decision to seek dismissal of this Litigation does not necessarily reflect the Commission's position on any other case.

WHEREAS, by this stipulation, the Commission and the Defendant agree to have this Litigation dismissed.

NOW, THEREFORE,

1. Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the Commission and the Defendant stipulate that this Litigation be dismissed with prejudice as to the conduct alleged in the Complaint through the date of the filing of this Stipulation, and without costs or fees to either party.

2. Defendant, for himself and any of his agents, attorneys, employees, or representatives, hereby waives and releases:

a. Any and all rights under the Equal Access to Justice Act, the Small Business Regulatory Enforcement Fairness Act of 1996, or any other provision of law to seek from the United States, or any agency, or any official of the United States acting in his or her official capacity, directly or indirectly, reimbursement of attorney's fees or other fees, expenses, or costs expended by Defendant that in any way relate to the Litigation, including but not limited to investigative steps taken prior to commencing the Litigation.

b. Any and all claims, demands, rights, and causes of action of every kind and nature, asserted or unasserted, against the Commission and its present and former officers or employees that arise from or in any way relate to the Litigation, including but not limited to investigative steps taken prior to commencing the Litigation.

3. Each of the undersigned represents that they have the authority to execute this stipulation on behalf of the party so indicated.

STIPULATED AND AGREED:

John B. Timmer

John B. Timmer
timmerj@sec.gov
SECURITIES AND EXCHANGE COMMISSION
100 F Street NE
Washington, DC 20549
Tel: +1 (202) 551 7687
Counsel for Plaintiff
Dated: January 9, 2026

Theodore V. Wells, Jr.
Geoffrey R. Chepiga
Walter G. Ricciardi
gchepiga@paulweiss.com
PAUL, WEISS, RIFKIND, WARTON & GARRISON LLP
1285 Avenue of the Americas
New York, NY 10019-6064
Tel: +1 (212) 373-3421
Counsel for Defendant
Dated: November 14, 2025