

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff,

Case No.: 09-CV-1775

v.

Magistrate Judge Gilbert

THE NUTMEG GROUP, LLC,
ET AL.

Defendants,

**PLAINTIFF’S MOTION FOR DISGORGEMENT
AGAINST DAVID GOULDING,
DAVID GOULDING, INC., AND DAVID SAMUEL, LLC**

Pursuant to court-approved settlements, Plaintiff Securities and Exchange Commission (“the SEC”) respectfully requests that this Court order Defendant David Goulding and Relief Defendants David Goulding, Inc. and David Samuel, LLC to pay disgorgement and prejudgment interest as a consequence of Nutmeg’s violations of the Investment Advisers Act of 1940. The Court should order David Goulding to pay \$97,639.83 in disgorgement, plus \$43,787 in prejudgment interest, for a total of \$141,426.83. The Court should order David Goulding, Inc. to pay \$3,317.75 in disgorgement, plus \$1,587 in prejudgment interest, for a total of \$4,904.75. And the Court should order David Samuel, LLC to pay \$9,769.44 in disgorgement, plus \$4,430 in prejudgment interest, for a total of \$14,199.44.

In support of this motion, the SEC also submits an accompanying memorandum of law and the Declaration of Ann Tushaus.

Dated: March 5, 2018

By: /s/ Robert Moye

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Plaintiff Securities and Exchange Commission

CERTIFICATE OF SERVICE

I hereby certify that, on March 5, 2018, I caused a copy of Plaintiff's **Motion for Disgorgement Against David Goulding, David Goulding, David Goulding, Inc., and David Samuel, LLC** to be served upon all parties and counsel of record by the Court's ECF system.

/s/ Robert Moyer