

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

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UNITED STATES SECURITIES AND  
EXCHANGE COMMISSION,

Plaintiff,

Case No.: 11-CV-8264

v.

Judge Charles P. Kocoras

PATRICK G. ROONEY and  
SOLARIS MANAGEMENT, LLC

Defendants.

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**AGREED MOTION FOR ENTRY OF JUDGMENT  
OF PERMANENT INJUNCTIONS AGAINST ALL DEFENDANTS**

Plaintiff Securities and Exchange Commission (the “Commission”) respectfully moves this Court for entry of the proposed agreed judgment for permanent injunctions against Defendants Patrick G. Rooney (“Rooney”) and Solaris Management, LLC (collectively, “Defendants”), a copy of which is attached as exhibits to Defendants’ signed consents.<sup>1</sup> In support of the motion, the Commission states as follows:

1. On November 18, 2011, the Commission filed a Complaint against Defendants for violating the federal securities laws. (Docket No. 1) The proposed Judgment, among other things, permanently enjoins Defendants from violating Sections 206(1), 206(2), and 206(4) of the Investment Advisers Act of 1940 (“Advisers Act”) [15 U.S.C. § 80b-6(1), 80b-6(2), and 80b-6(4)] and Rules 206(4)-8(a)(1) and (a)(2) thereunder [17 C.F.R. § 275.206(4)-8(a)(1) and (a)(2)]; Section 17(a) of the Securities Act of 1933 (the “Securities Act”) [15 U.S.C. § 77q(a)]; and Sections 10(b) and 13(d)(1) of the Securities Exchange Act of 1934 (the “Exchange Act”) [15

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<sup>1</sup> Pursuant to the Court’s standing instructions, a copy of the proposed judgment was emailed to chambers.

U.S.C. § 78j(b) and 78m(d)(1)] and Rules 10b-5 and 13d-1 thereunder [17 C.F.R. § 240.10b-5 and 240.13d-1

2. Defendants executed consents to the entry of the proposed Judgment, copies of which are attached as Exhibits 1 and 2 to this motion.

3. The entry of the proposed Judgment obviates the need for a hearing on the merits and conserves judicial resources.

4. The proposed Judgment does not – at this time – impose disgorgement or civil penalties against Defendants or an officer and director bar against Rooney. The parties agree that after limited discovery the Commission will file a motion asking the Court to determine whether: (i) Rooney should be prohibited from acting as an officer or director of any issuer that has a class of securities registered pursuant to Section 12 of the Exchange Act [15 U.S.C. § 78l] or that is required to file reports pursuant to Section 15(d) of the Exchange Act [15 U.S.C. § 78o(d)]; and (ii) Defendants should pay disgorgement of ill-gotten gains and a civil penalty pursuant to Section 20(d) of the Securities Act [15 U.S.C. § 77t(d)], Section 21(d)(3) of the Exchange Act [15 U.S.C. § 78u(d)(3)], and Section 209(e) of the Advisers Act [15 U.S.C. § 80b-9(e)] and, if so, the amounts of the disgorgement and civil penalty. (*See* attachments to Exhibits 1 and 2, Sections VI and VII.)

Dated: December 16, 2013

By: /s Daniel Hayes

Daniel Hayes  
Andrew Shoenthal  
175 West Jackson Boulevard, Suite 900  
Chicago, IL 60604  
Telephone: 312.353.7390

*Plaintiff United States Securities and  
Exchange Commission*

**CERTIFICATE OF SERVICE**

I, Daniel Hayes, hereby certify that, on December 16, 2013, I caused a copy of the foregoing **Agreed Motion for Entry of Judgment of Permanent Injunctions Against All Defendants** to be filed with the Clerk of the Court via the Court's ECF/CM system, which will automatically send a copy to all counsel of record.

**/s Daniel Hayes**