

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

TELEXPREE, INC.,  
TELEXPREE, LLC,  
JAMES M. MERRILL,  
CARLOS N. WANZELER,  
STEVEN M. LABRIOLA,  
JOSEPH H. CRAFT,  
SANDERLEY RODRIGUES DE VASCONCELOS,  
SANTIAGO DE LA ROSA,  
RANDY CROSBY and  
FAITH R. SLOAN,

Defendants,

and

TELEXPREE FINANCIAL, INC.,  
TELEXELECTRIC, LLLP and  
TELEX MOBILE HOLDINGS, INC.,

Relief Defendants.

**CHAMBERS  
COURTESY COPY**

Case No. 1:14-civ-11858-NMG

FILED  
IN CLERKS OFFICE  
2017 SEP 14 AM 9 02  
U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

**PLAINTIFF'S MOTION FOR LEAVE TO FILE  
SECOND AMENDED COMPLAINT**

Pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, plaintiff Securities and Exchange Commission ("the Commission") moves for leave to file a Second Amended Complaint in the form submitted herewith as to those defendants remaining in the case..

The Second Amended Complaint is intended to correct two errors. First, as set forth in paragraph 5 of the original Complaint (ECF #2) and the Amended Complaint (ECF #128), the Commission alleges that all defendants violated Section 5 of the Securities Act of 1933

*Motion allowed. s/AM Gorton, USDJ 9/28/17*