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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SECURITIES AND EXCHANGE COMMISSION, Plaintiff, v. TERREN S. PEIZER and ACUITAS GROUP HOLDINGS, LLC, Defendants.	2:23-cv-01511-DSF-MBK **JOINT STIPULATION TO DISMISS AND RELEASES**

<u>JOINT STIPULATION TO DISMISS AND RELEASES</u>

Plaintiff, the Securities and Exchange Commission ("Commission") and Defendants Terren S. Peizer and Acuitas Group Holdings, LLC ("Defendants"), respectfully submit this joint stipulation to dismiss and releases ("Stipulation").

WHEREAS the Commission filed its complaint in this civil enforcement action (the "Civil Action") on March 1, 2023.

WHEREAS, in the exercise of discretion, the Commission believes that dismissal of this case is appropriate.

WHEREAS the Commission's decision to dismiss the Civil Action does not necessarily reflect the Commission's positions in any other case.

WHEREAS, by this Stipulation, the Commission and Defendants agree to have the Civil Action dismissed.

NOW THEREFORE,

1. Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the Commission and Defendants stipulate that the Civil Action be dismissed with prejudice, and without costs or fees to either party.

2. Defendants, for themselves and any of their agents, attorneys, employees, or representatives, hereby waive and release:

   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[s] that in any way relate to the Civil Action, including but not limited to investigative steps taken prior to commencing the Civil Action.

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 Civil Action, including but not limited to investigative steps taken prior to commencing the Civil Action.

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:

/s/ James P. Connor
James P. Connor (*pro hac vice*)
Kevin Guerrero (*pro hac vice*)
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/s/ David Karl Willingham
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Dated: August 7, 2026