UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION, **Plaintiff,** **v.** **STEPHEN E. BUYER,** **Defendant,** **and** **JONI L. BUYER,** **Relief Defendant.**	**No. 1:22-cv-06279-JHR**

JOINT STIPULATION TO DISMISS AND RELEASES

Plaintiff Securities and Exchange Commission (the "Commission"), Defendant Stephen E. Buyer, and Relief Defendant Joni L. Buyer (collectively "the Defendants") respectfully submit this joint stipulation ("Stipulation").

WHEREAS the Commission filed its complaint in this civil enforcement action (the "Civil Action") on July 25, 2022.

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

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

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

NOW, THEREFORE,

1. Pursuant to FED. R. CIV. P. 41(a)(1)(A)(ii), the Commission and the Defendants stipulate that the Civil Action 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. 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 Defendants 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

The Clerk of Court is directed to close the case.

SO ORDERED.

Jennifer H. Rearden, U.S.D.J.
Dated: August 25, 2026

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Dated: 8/20/2026

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Dated: 14 July 2026

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Counsel for Joni L. Buyer

Dated: July 14, 2026