

**BEFORE THE INVESTOR PROTECTION DIRECTOR
FOR THE STATE OF DELAWARE**

Andrew Zahlan, : Investor Protection Matter Nos. 21-0137, 22-0119
et al. :
 :
Respondents. :

ORDER

WHEREAS, on September 23, 2022, the Investor Protection Unit of the Delaware Department of Justice (the “Unit”) issued a Summary Order to Cease and Desist (“Summary Order”) against multiple respondents following a preliminary investigation in the captioned matter;

WHEREAS, the investigation into this matter is ongoing;

WHEREAS, respondent Ogu-eke Munachimso Mctony (“Mr. Mctony”) requested a hearing in the timeframe permitted by Rule 265(b) of the Rules Pursuant to the Delaware Securities Act;

WHEREAS, further investigation into Mr. Mctony’s role led the Unit to conclude that Mr. Mctony should no longer be listed as a respondent;

NOW, THEREFORE, IT IS ORDERED that Mr. Mctony is no longer a respondent in the captioned matter, and the Summary Order issued on September 23, 2022, no longer applies to him. The Summary Order otherwise remains in effect.

DATED: December 2, 2022

/s/ Jillian Lazar

Jillian Lazar
Presiding Officer
Delaware Department of Justice