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equities. Lawrencia Afriyie, age 59, resides in Monmouth County, New Jersey. Lawrencia Afriyie is the mother of John Afriyie and the sole owner of a brokerage account in which John Afriyie placed trades, including trades in the ADT options which are the subject of this Complaint. During the relevant period, John Afriyie repeatedly accessed Lawrencia Afriyie's account from his home and work. Lawrencia Afriyie's account currently holds approximately \$ 1.4 million of the illicit profits from John Afriyie's insider trading, in a combination of cash and securities.

FIRST CLAIM FOR RELIEF Violations of Section 10(b) of the Exchange Act and Rule 10b-5 Thereunder (Against Defendant John Afriyie) At the time of each trade identified herein, John Afriyie was in possession of nonpublic information. The relevant information was nonpublic, and held by Investment Firm as confidential information related to potential financing for the ADT acquisition. In addition, the information was considered confidential by its source. At the time of each trade identified herein, John Afriyie was in possession of material information. The relevant information was material because it would have been important to a reasonable investor in making his or her investment decision. There is a substantial likelihood that the disclosure of the misappropriated information would have been viewed by a reasonable investor as having significantly altered the total mix of information available to investors. John Afriyie placed each of the trades identified herein using Lawrencia Afriyie's brokerage account while in possession of material nonpublic information. In each instance, John Afriyie knew, or was reckless in not knowing, that he owed a duty to Investment Firm to refrain from misappropriating confidential information for his personal benefit. In each instance, John Afriyie knew, or was reckless in not knowing, that Investment Firm owed a duty to Apollo to maintain the confidentiality of such information. By engaging in the conduct described above, John Afriyie, directly or indirectly, in connection with the purchase or sale of securities, by the use of means or instrumentalities of interstate commerce, or of the mails, with scienter: (a) employed devices, schemes, or artifices to defraud; (b) made untrue statements of material fact or omitted to state material facts necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; and (c) engaged in acts, practices, or courses of business which operated or would operate as a fraud or deceit upon other persons, including purchasers and sellers of securities. By reason of the actions alleged herein, John Afriyie has violated and, unless enjoined, will continue to violate Section 10(b) of the Exchange Act 15 U.S.C. section 78j(b) and Rule 10b-5 17 C.F.R. section 240.10b-5.

SECOND CLAIM FOR RELIEF (Equitable Claim Against Relief Defendant Lawrencia Afriyie) John Afriyie used Lawrencia Afriyie's brokerage account to execute the illegal insider trades in ADT options. As the owner of the account, Lawrencia Afriyie received and currently holds proceeds of the unlawful trades that John Afriyie executed in the account. Lawrencia Afriyie has no legitimate or good faith claim to these ill-gotten gains. Lawrencia Afriyie obtained the funds under circumstances in which it is not just, equitable, or conscionable for her to retain the funds. Lawrencia Afriyie has therefore been unjustly enriched.

Other Incident Info: U.S. SECURITIES AND EXCHANGE COMMISSION Litigation Release No. 23519 / April 14, 2016 Securities and Exchange Commission v. John Afriyie, et al., Civil Action No. 1:16-cv2777 (S.D.N.Y.) The Securities and Exchange Commission announced insider trading charges against a research analyst who allegedly reaped more than \$ 1.5 million in February through trades he made in his mother's brokerage account

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