

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 16-cv-81413-RLR-JMH

SECURITIES AND EXCHANGE COMMISSION,)
)
 Plaintiff,)
 v.)
)
 GLOBAL DIGITAL SOLUTIONS, INC., et al.)
)
 Defendants.)
 _____)

**PLAINTIFF’S NOTICE OF FILING CONSENT OF DEFENDANT GLOBAL DIGITAL
SOLUTIONS, INC. AND REQUEST FOR ENTRY OF
JUDGMENT OF PERMANENT INJUNCTION AND OTHER RELIEF**

Plaintiff Securities and Exchange Commission hereby files the attached signed Consent of Defendant Global Digital Solutions, Inc. (“GDSI”) to Judgment of Permanent Injunction and Other Relief (“Judgment”) and respectfully requests entry of the attached proposed Judgment.

The entry of this Judgment will resolve the issue of liability as to Defendant GDSI. After the entry of the Judgment, the Commission staff will attempt to resolve the remaining issues of disgorgement and civil penalty with the GDSI, or in the event it is unable to do so, file the appropriate motion.¹

¹ Although as indicated in the Commission’s filing on December 21, 2017, [DE 28] the Commission and GDSI had previously reached an agreement in principle as to disgorgement and civil penalty as well, at this stage the parties have been unable to officially consummate this agreement due to a failure of GDSI to meet a contingency. Thus, in lieu of a complete resolution, the parties have agreed to resolve the issue of liability now, and bifurcate the issues of disgorgement and civil penalty, with the aim of reaching a resolution without the need for the Commission to file a motion.

As to Defendant Sullivan, the Commission staff has reached a settlement in principle, in full, as to issues of liability, civil penalty, and officer and director and penny stock bar, and Mr. Sullivan has met his requisite contingency. The staff is currently in the process of seeking the approval of the current two-member Commission in Washington, D.C., and anticipates, if approval is granted, to be able to file Mr. Sullivan’s consent accompanied by a proposed Final Judgment as to Mr. Sullivan in approximately 30 days.

Dated: March 7, 2017

Respectfully submitted,

By: /s/Russell Koonin
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 7, 2017, the foregoing document is being served on all counsel of record or *pro se* parties identified on the below Service List via e-mail and U.S. mail.

/s/ Russell Koonin

Russell Koonin

SERVICE LIST

I HEREBY CERTIFY that on March 7, 2017, the foregoing document was served by filing on CM/ECF to counsel of record authorized to receive notice via CM/ECF and sent via U.S. and electronic mail to *pro se* litigant Richard Sullivan, 713 Presidential Drive, Boynton Beach, FL 33435, sullivanrichard96@yahoo.com.