

The Law

1. Pursuant to New Hampshire RSA 421-B:3-301(since 2016), and RSA 421-B:11 (before 2016) it is unlawful for any person to offer or sell any security in this state unless the security is registered pursuant to RSA 421-B, the security, offer, or transaction is exempt under RSA 421-B:2-201 through 2-203 (since 2016) or RSA 421-B:17 (before 2016), or the security is federally covered. Respondent Access is subject to this provision.
 2. Pursuant to RSA 421-B:3-302 (since 2016) and RSA 421-B:11(I-a)(e) (before 2016), Access, which sold a federal covered security as described in section 18(b)(4)(F) of the Securities Act of 1933, was required to notice file with the Bureau within fifteen (15) days of the first sale in New Hampshire yet, as outlined above, Access filed its notice filing on August 30, 2019, more than one year after the first sale of covered securities in New Hampshire.
 3. Pursuant to RSA 421-B:6-614(d)(2)(since 2016) and RSA 421-B:31(IV)(b) (before 2016), any notice filing delinquent by more than one (1) year may be subject to the fines and penalties outlined in RSA 421-B:6-603, 6-604, and 5-508 (since 2016) or RSA 421-B:23, 24, 25, and 26 (before 2016). Respondent Access is subject to these provisions.
 4. Pursuant to RSA 421-B:31(I)(h) (before 2016) notice filed securities covered under section 18(b)(4)(F) of the Securities Act of 1933 must pay an annual renewal notice fee of \$500. Respondent Access is subject to this provision.
- II. In view of the foregoing, Respondent agrees to the following undertaking and sanctions:
1. Respondent Access agrees that that it has voluntarily consented to the entry of this Order and represents and avers that no employee or representative of the Bureau has made any promise, representation, or threat to induce its execution.
 2. Respondent Access agrees to waive its right to an administrative hearing and any appeal therein under this chapter.
 3. Respondent Access agrees that this Order is entered into for purpose of resolving only the matter as described herein. This Order shall have no collateral estoppel, res judicata or evidentiary effect in any other lawsuit, proceeding, or action, not described herein. Likewise, this Order shall not be construed to restrict the Bureau's right to initiate an administrative investigation or proceeding relative to conduct by Respondent which the Bureau has no knowledge at the time of the date of final entry of this Order.

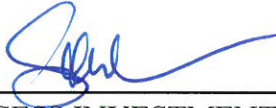
4. Respondent Access agrees not to take any action or make or permit to be made any public statement, including in regulatory filings or otherwise, denying, directly or indirectly, any allegation in this Consent Order or create the impression that the Consent Order is without factual basis. Nothing in this provision affects Respondent's testimonial obligations or right to take legal positions in litigation in which the State of New Hampshire is not a party.
5. Respondent Access agrees not to engage in future violations of NH RSA 421-B.
6. Respondent Access agrees to submit payment to the State of New Hampshire representing administrative penalties in the amount of Two Thousand Five Hundred Dollars (\$2,500).
7. Respondent Access agrees to submit payment to the State of New Hampshire representing back renewal fees in the amount of Five Thousand Dollars (\$5,000).
8. Upon execution of this Order by Respondent Access, Access agrees to pay a total of Seven Thousand Five Hundred Dollars (\$7,500) to the State of New Hampshire, which will be applied to settlement of the above-captioned matter. Payment must be made by 1) business check, certified check, or postal money order; 2) made payable to the State of New Hampshire; and 3) mailed to the Bureau of Securities Regulation, Department of State, State House, Room 204, Concord, New Hampshire, 03301.
9. This Consent Order is not intended to indicate that Respondent should be subject to any statutory disqualification set forth in (a) the federal securities laws or regulations promulgated thereunder, (b) the rules and regulations of any self-regulatory organizations, or (c) various states' securities laws, including any disqualifications from relying upon exemptions from registration or associated safe harbor provisions. The Bureau confirms that disqualification under 17 C.F.R. § 230.506(d)(1)(iii)(A)-(B) is not intended to arise as a consequence of this Consent Order.

III. Based on the foregoing, the Bureau deems it appropriate and in the public interest to accept and enter into this Order. **THEREFORE, IT IS HEREBY ORDERED THAT:**

1. Respondent not engage in further violations of the New Hampshire Securities Act pursuant to RSA 421-B.
2. Respondent pay administrative penalties in the amount of Two Thousand Five Hundred Dollars (\$2,500).
3. Respondent pay back renewal fees in the amount of Five Thousand Dollars (\$5,000).

4. Respondent comply with the above-referenced undertakings and sanctions.

Executed this 12 day of JUNE, 2020.



ACCESS INVESTMENT, LLC

By: Stephen Pollack
Manager of Lighthouse Management, LLC

Its: Manager of Access Investment, LLC

Entered this 25th day of June, 2020.



Barry Glennon, Director
N.H. Bureau of Securities Regulation