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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

G. Thomas Cooper, Jr. Circuit Court Judge

Case No. 2014-CP-40-3389  
Appellate Case No. 2014-001652

RECEIVED  
JUN 18 2015  
SC Court of Appeals

Alan Wilson, Securities Commissioner of South Carolina,.....Respondent,

v.

Integrated Capital Strategies, LLC,.....Appellant.

**MOTION IN SUPPORT OF VERIFIED APPLICATION OF  
CHRISTOPHER STALEY, ESQUIRE FOR ADMISSION *PRO HAC VICE***

We, Tracey C. Green and Chad N. Johnston (“Movants”), hereby move this Honorable Court for an Order pursuant to Rules 240 and 404 of the South Carolina Appellate Court Rules, admitting Christopher Staley, Esquire *pro hac vice* to practice before this Court for the sole purpose, in conjunction with the undersigned, of submitting an *Amicus Curiae* Brief on issues contained in the above-captioned appeal.

In support thereof, Movants would show:

1. Christopher Staley, Esquire is a member in good standing of the Bar of Virginia and is employed by the North American Securities Administrators Association, Inc., with offices at 750 First Street, N.E., Suite 1140, Washington, DC 20002.

2. Movants are members of the law firm of Willoughby & Hoefler, P.A., 931 Richland Street (Post Office Box 8416), Columbia, South Carolina 29201, and are members in good standing with the South Carolina Bar (S.C. Bar Nos. 9342 and 73752, respectively), and residents of South Carolina.

3. Movants have been associated and are simultaneously submitting a motion for leave to file an *Amicus Curiae* Brief, along with conditionally filed copies of same, in conjunction with Mr. Staley in this appeal.

4. Mr. Staley agrees to be subject to and abide by the ethical standards governing the practice of law in South Carolina and before this Court, which are incorporated herein by this reference.

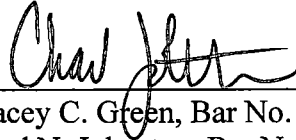
5. A Verified Application for Admission *Pro Hac Vice* in the State of South Carolina for Christopher Staley has been completed and filed with the Supreme Court of South Carolina, Office of Bar Admissions, together with the requisite filing fee of \$250.00. The original Verified Application for Admission is attached and incorporated herein by this reference.

6. The undersigned have communicated with counsel of record for the parties in this appeal who have no objection to this motion.

WHEREFORE, Movants pray that Mr. Staley be admitted to practice *pro hac vice* before this Court in this appeal.

[SIGNATURE PAGE FOLLOWS]

Respectfully Submitted,



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Tracey C. Green, Bar No. 9342  
Chad N. Johnston, Bar No. 73752  
**WILLOUGHBY & HOEFER, P.A.**  
930 Richland Street  
PO Box 8416  
Columbia, SC 29202  
803-252-3300

June 18, 2015  
Columbia, South Carolina

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*  
IN THE STATE OF SOUTH CAROLINA**

Alan Wilson, Securities Commissioner of  
South Carolina

Appellate Case No. 2014-001652

South Carolina Court of  
Appeals

Plaintiff

Case No.

Court

vs.

Integrated Capital Strategies, LLC  
Defendant

Mailing Address of Court: Calhoun Building  
1220 Senate Street  
Columbia, SC 29201

Comes now Christopher Staley, applicant herein, and respectfully represents the following:

1. Applicant resides at:

1305 22<sup>nd</sup> Street, N.W., Apt. 4

Street Address

Washington

City

\_\_\_\_\_ County

DC

State

20037

Zip Code

937-524-9280

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) North

American Securities Administrators Association, Inc., with offices at, at

750 First Street, N.E. Suite 1140

Street Address

Washington

City

\_\_\_\_\_ County

DC

State

20002

Zip Code

202-737-0900

Telephone

202-783-3571

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by North American Securities Administrators Association, Inc. to provide legal representation in connection with the above case now pending before the above named court of the State of South Carolina.

4. Since October of 2009, applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of Virginia where applicant regularly practices law. Attached is a certificate of good standing.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:	Date Admitted:
Supreme Court of Virginia	October 16, 2009

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below:  
(List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

9. Local counsel of record associated with applicant in this case is Tracey C. Green and Chad N. Johnston, of the Willoughby & Hoefler, P.A. law firm, which has offices at:

930 Richland Street (Post Office Box 8416)

Street Address

Richland

County

(803) 252-3300

Telephone

Columbia

City

South Carolina

State

29202

Zip Code

If applicable list all other firms/attorneys you are associated with in this matter

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 15th day of June, 2015.

Christopher M Staley  
APPLICANT

VERIFICATION

STATE OF District of Columbia

COUNTY OF Washington

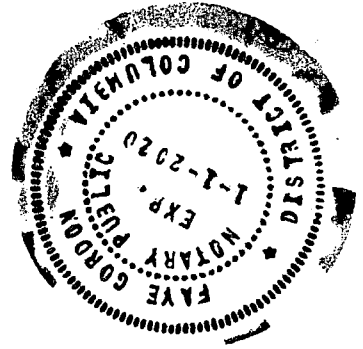
I, Christopher Staley, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

Christopher M Staley  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 15 day of June, 2015.

[Signature]  
Notary Public for the State of District of Columbia

My Commission Expires: January 1, 2020



LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this \_\_\_\_ day of \_\_\_\_, 20 \_\_\_\_.

LOCAL COUNSEL OF RECORD

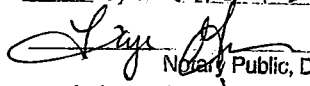
CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this \_\_\_\_ day of June, 2015.

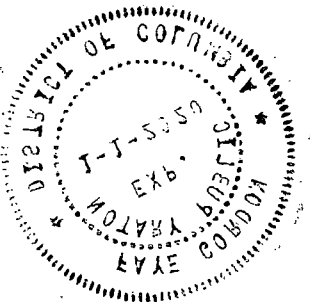
Christopher M Staley  
APPLICANT/AFFIANT

District of Columbia: SS

Subscribed and sworn to before me, in my presence,  
this 15 day of June, 2015

  
Notary Public, D.C.

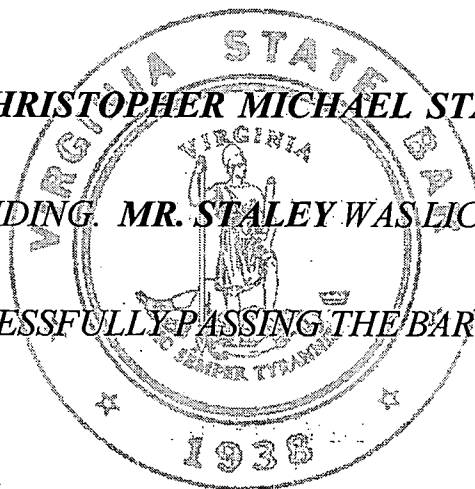
My commission expires January 1, 2020



# VIRGINIA STATE BAR

## CERTIFICATE OF GOOD STANDING

THIS IS TO CERTIFY THAT **CHRISTOPHER MICHAEL STALEY** IS AN ACTIVE MEMBER OF THE VIRGINIA STATE BAR IN GOOD STANDING. **MR. STALEY** WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON **OCTOBER 16, 2009**, AFTER SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.



Issued May 19, 2015

A handwritten signature in black ink, appearing to read "Karen A. Gould".

KAREN A. GOULD  
EXECUTIVE DIRECTOR AND  
CHIEF OPERATING OFFICER

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

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SC Court of Appeals

Alan Wilson, Securities Commissioner of South Carolina,.....Respondent,

v.

Integrated Capital Strategies, LLC,.....Appellant.

**PROOF OF SERVICE**

This is to certify that I, a paralegal with the law firm Willoughby & Hoefler, P.A., have caused to be served this day one (1) copy of a the **Motion and Verified Application for Admission *Pro Hac Vice*** of Christopher Staley by placing same in the care and custody of the United States Postal Service with first class postage affixed thereto and addressed as follows:

Tracy A. Meyers, Esquire  
Ian P. Weschler, Esquire  
South Carolina Attorney General's Office  
P.O. Box 11549  
Columbia, S.C. 29211-1549

James M. Griffin, Esquire  
Margaret N. Fox, Esquire  
1513 Hampton Street  
Columbia, S.C. 29201

*Breanna M. Karns*

Breanna M. Karns

Columbia, South Carolina  
This 18th day of June 2015

**WILLOUGHBY & HOEFER, P.A.**

ATTORNEYS & COUNSELORS AT LAW  
930 RICHLAND STREET  
P.O. BOX 8416  
COLUMBIA, SOUTH CAROLINA 29202-8416

MITCHELL M. WILLOUGHBY  
JOHN M.S. HOEFER  
RANDOLPH R. LOWELL\*\*  
TRACEY C. GREEN  
BENJAMIN P. MUSTIAN\*\*  
ELIZABETH ZECK\*  
ELIZABETHANN LOADHOLT CARROLL  
CHAD N. JOHNSTON  
JOHN W. ROBERTS  
ANDREW J. D'ANTONI

AREA CODE 803  
TELEPHONE 252-3300  
TELECOPIER 256-8062

ELIZABETH S. MABRY  
OF COUNSEL

\*ALSO ADMITTED IN TX  
\*\*ALSO ADMITTED IN WASHINGTON, D.C.

June 18, 2015

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JUN 18 2015

SC Court of Appeals

**VIA HAND DELIVERY**

Honorable Jenny A. Kitchings  
Clerk of Court  
**South Carolina Court of Appeals**  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: Alan Wilson, Securities Commissioner of South Carolina v. Integrated Capital Strategies, LLC;  
Case No. 2014-CP-40-3389  
Appellant Case No. 2014-001652


Dear Ms. Kitchings:

Pursuant to Rules 240 and 404, of the South Carolina Appellate Court Rules, please find for filing the enclosed original and seven (7) copies of the **Motion and Verified Application for Admission Pro Hac Vice** of Christopher Staley, in the above-captioned matter. A copy of the Verified Application has been filed with the Office of Bar Admissions with a request that the receipt of same be certified forthwith to you. Also enclosed is a check in the amount of \$25.00 for the motion fee. I would appreciate your acknowledging receipt of the motion by file stamping the extra copy and returning it to me via our courier.

If you have any questions or need additional information, please contact me at your convenience. With best regards, I am

Respectfully,

**WILLOUGHBY & HOEFER, P.A.**

  
Chad N. Johnston

Honorable Jenny A. Kitchings

June 18, 2015

Page 2

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Enclosures

cc: Tracy A. Meyers, Esquire (via U.S. Mail)  
Ian P. Weschler, Esquire (via U.S. Mail)  
James M. Griffin, Esquire (via U.S. Mail)  
Margaret N. Fox, Esquire (via U.S. Mail)