

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING

File No. 3-21358

In the Matter of

ROBERTO MEJILL-TELLADO,

Respondent.

**RESPONDENT'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL AFFIDAVIT
IN FURTHER SUPPORT OF PETITION FOR LIMITED MODIFICATION OF BAR**

Respondent Roberto Mejill-Tellado ("Respondent"), proceeding pro se, respectfully moves for leave to file the attached Supplemental Affidavit in further support of his Petition for Limited Modification of Bar pursuant to Rule 193 of the Commission's Rules of Practice.

I. PURPOSE OF THE SUPPLEMENTAL AFFIDAVIT

1. The Supplemental Affidavit is submitted to further clarify Respondent's compliance with Rule 193(c) and to ensure that the administrative record fully addresses the factors set forth in Rule 193(e).
2. The Supplemental Affidavit does not introduce new legal arguments, new theories of relief, or new requests beyond those already presented in Respondent's Petition and Reply Brief.
3. Rather, it provides additional sworn clarification concerning compliance with the Commission's April 4, 2023 Order; ongoing compliance with court-ordered restitution obligations; completion of supervised release; corporate and employment-related clarifications previously discussed; and the structural safeguards proposed to ensure that any limited modification would remain consistent with the public interest.

II. NO PREJUDICE TO THE DIVISION

- 4. The requested leave will not prejudice the Division of Enforcement.
- 5. The Supplemental Affidavit does not expand the scope of the Petition, alter the requested relief, or seek to reopen briefing.
- 6. It serves solely to ensure that the Commission has a complete and fully sworn factual record when evaluating the public interest under Rule 193.

III. INTEREST OF A COMPLETE ADMINISTRATIVE RECORD

- 7. Proceedings under Rule 193 involve a fact-specific and individualized public interest determination.
- 8. Respondent respectfully submits that permitting the filing of the Supplemental Affidavit will assist the Commission in conducting its forward-looking analysis without expanding or complicating the issues presented.
- 9. The submission is made in good faith and in the interest of procedural completeness.

IV. CONCLUSION

For the foregoing reasons, Respondent respectfully requests that the Commission grant leave to file the attached Supplemental Affidavit in further support of his Petition for Limited Modification of Bar.

[REDACTED]
[REDACTED] Respectfully submitted,

/s/ Roberto Mejill-Tellado

Roberto Mejill-Tellado

Respondent, Pro Se

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dated: February 22, 2026

CERTIFICATE OF SERVICE

Pursuant to Rule 150 of the Commission's Rules of Practice, I hereby certify that on February 22, 2026, a true and correct copy of the foregoing Motion for Leave to File Supplemental Affidavit was filed using the Commission's eFAP system and served via E-mail on:

Russell Koonin, Esq.

Senior Trial Counsel

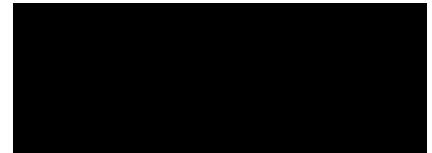
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Roberto Mejill-Tellado