

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE	:	
COMMISSION,	:	
	:	
Plaintiff,	:	
	:	23 Civ. 1424 (ENV) (JRC)
-against-	:	
	:	
OZY MEDIA, INC., CARLOS R. WATSON,	:	
JR., SAMIR RAO, and SUZEE HAN,	:	
	:	
Defendants.	:	
	:	
-----X		

**JOINT STIPULATION TO DISMISS AND RELEASES**

Plaintiff United States Securities and Exchange Commission (the “Commission”) and Defendant Carlos R. Watson, Jr. (“Defendant”) respectfully submit this joint stipulation (“Stipulation”).

**WHEREAS** the Commission filed its complaint in this civil enforcement action (the “Civil Action”) on February 23, 2023.

**WHEREAS**, in the exercise of its discretion, the Commission believes the dismissal of this case is appropriate.

**WHEREAS** the Commission’s decision to seek dismissal of the Civil Action does not necessarily reflect the Commission’s position on any other case.

**WHEREAS**, by this Stipulation, the Commission and the Defendant agree to have the Civil Action dismissed.

**NOW, THEREFORE,**

1. Pursuant to FED.R.CIV.P. 41(a)(1)(A)(ii), the Commission and the Defendant

stipulate that the Civil Action be dismissed with prejudice as to the conduct alleged in the Complaint through the date of the filing of this Stipulation, and without costs or fees to either party.

2. Defendant, for himself and any of his agents, attorneys, employees, or representatives, hereby waives and releases:
  - a. Any and all rights under the Equal Access to Justice Act, the Small Business Regulatory Enforcement Fairness Act of 1996, or any other provision of law to seek from the United States, or any agency, or any official of the United States acting in his or her official capacity, directly or indirectly, reimbursement of attorney's fees or other fees, expenses, or costs expended by Defendant that in any way relate to the Civil Action, including but not limited to investigative steps taken prior to commencing the Civil Action.
  - b. Any and all claims, demands, rights, and causes of action of every kind and nature, asserted or unasserted, against the Commission and its present and former officers or employees that arise from or in any way relate to the Civil Action, including but not limited to investigative steps taken prior to commencing the Civil Action.
3. Each of the undersigned represents that they have the authority to execute this Stipulation on behalf of the party so indicated.

STIPULATED AND AGREED



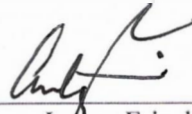
Margaret A. Ryan  
Director, Division of Enforcement  
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/s/ Hayden M. Brockett

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*Counsel for Plaintiff  
Securities and Exchange Commission*

Dated: September 12, 2025



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*Counsel for Defendant Carlos R. Watson*

Dated: September 13, 2025