

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 101508 / November 4, 2024**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-21405**

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<b>In the Matter of</b>	:	
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	:	<b>SECOND EXTENSION ORDER</b>
<b>PINNACLE INVESTMENTS,</b>	:	
<b>LLC,</b>	:	
	:	
<b>Respondent.</b>	:	

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The Division of Enforcement (“Division”) has requested an extension of time until July 1, 2025, to submit a Proposed Plan of Distribution under Rule 1101(a) of the Commission’s Rules on Fair Fund and Disgorgement Plans, 17 C.F.R. § 201.1101(a).

On May 5, 2023, the Commission issued an Order Instituting Administrative and Cease-and-Desist Proceedings, Pursuant to Section 15(b) of the Securities Exchange Act of 1934 and Sections 203(e) and 203(k) of the Investment Advisers Act of 1940, Making Findings, and Imposing Remedial Sanctions and a Cease-and-Desist Order (the “Order”)<sup>1</sup> against Pinnacle Investments, LLC (“Pinnacle” or the “Respondent”). In the Order, the Commission found that from January 2015 to October 2022, Pinnacle, a registered investment adviser and broker-dealer, made false and misleading statements in Commission filings regarding reviews of advisory client accounts; failed to adequately disclose its conflicts of interests in connection with the outside business activities and related compensation arrangements of an Investment Adviser

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<sup>1</sup> Exchange Act Rel. No. 97488 (May 5, 2023).

Representative with an affiliated fund; failed to adopt and implement policies and procedures reasonably designed to prevent violations of the Advisers Act concerning reviews of client accounts and conflicts of interest; and failed to deliver required information concerning advisory personnel to its clients. The Commission ordered the Respondent to pay \$83,462.00 in disgorgement, \$11,874.00 in prejudgment interest, and a \$393,381.00 civil money penalty, for a total of \$488,717.00, to the Commission according to a payment plan described in the Order. The Commission also created a Fair Fund, pursuant to Section 308(a) of the Sarbanes-Oxley Act of 2002, so the penalty collected, along with the disgorgement and prejudgment interest collected, can be distributed to harmed investors (the “Fair Fund”).

The Fair Fund consists of the \$495,087.68 collected from the Respondent. The Fair Fund has been deposited in a Commission-designated account at the U.S. Department of the Treasury, and any accrued interest will be added to the Fair Fund.

On June 17, 2024, the Division, pursuant to delegated authority, issued an Extension Order,<sup>2</sup> extending the time to submit a proposed plan of distribution to November 4, 2024.

In its request for an extension of time, the Division states that additional time is needed to complete the process of appointing administrators, finalize the distribution methodology, and complete the proposed plan of distribution.

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<sup>2</sup> Exchange Act Rel. No. 100359 (June 17, 2024).

Accordingly, for good cause shown, IT IS HEREBY ORDERED that the Division's request for an extension of time until July 1, 2025, to submit a Proposed Plan of Distribution is granted.

For the Commission, by the Division of Enforcement, pursuant to delegated authority.<sup>3</sup>

Vanessa A. Countryman  
Secretary

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<sup>3</sup> 17 C.F.R. § 200.30-4(a)(21)(i).