

UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549

ADMINISTRATIVE PROCEEDINGS RULINGS  
Release No. 4633/February 28, 2017

ADMINISTRATIVE PROCEEDING  
File Nos. 3-17818 and 3-17819

In the Matters of

GL CAPITAL PARTNERS, LLC, and  
GL INVESTMENT SERVICES, LLC

ORDER REGARDING  
SERVICE

On January 30, 2017, the Securities and Exchange Commission issued two orders instituting proceedings (OIPs) under Section 203(e) of the Investment Advisers Act of 1940 against Respondents. The two proceedings were consolidated on February 17, 2017. *GL Capital Partners, LLC*, Admin. Proc. Rulings Release No. 4609, 2017 SEC LEXIS 496.

The Division of Enforcement filed a declaration of service on February 22, 2017, which states that the Office of the Secretary sent the OIPs to Respondents at 400 5th Avenue, Waltham, MA 02451, the address shown on their most recent Form ADV filings. Jones Decl. at 2. The postal service reports that the OIP sent to Respondent GL Capital Partners was “undeliverable as addressed.” Jones Decl. Ex. 1. As to Respondent GL Investment Services, the evidence reveals that at various times, the OIP was “out for delivery” or “in transit to destination” or had arrived at a postal facility. Jones Decl. Ex. 2. The evidence does not reveal whether the postal service attempted delivery or was unable to do so. *Id.*

I take official notice under Rule of Practice 323, 17 C.F.R. § 201.323, that the last Form ADV each Respondent filed with the Commission states that they are located at 400 Fifth Ave. 6th Floor, Waltham, MA 02451. Comparison of this address with the address to which the Office of the Secretary mailed the OIPs reveals that the Secretary’s mailing omitted the floor on which Respondents are located. This may explain why GL Capital Partners’ OIP was undeliverable as addressed and the lack of evidence regarding GL Investment Services’ OIP.<sup>1</sup> Given the foregoing, I ORDER the Division to properly serve the OIPs on Respondents.

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<sup>1</sup> According to the postal service’s inspector general, reasons that a mailing might be undeliverable as addressed include “an incomplete address . . . [or] an illegible or incorrect address.” See Office of Inspector Gen., U.S. Postal Serv., Undeliverable as Addressed Mail Audit Report, 13 (July 14, 2014), <https://www.uspsoidg.gov/sites/default/files/document-library-files/2015/ms-ar-14-006.pdf>.

The OIPs allege that Respondents are controlled by Daniel Thibeault, who is not a party to this proceeding. OIPs at 1. The Division should consider whether Mr. Thibeault should also be served with the OIPs to give Respondents further opportunity to defend themselves in this proceeding. *See* 17 C.F.R. § 201.102(b) (allowing a member of a partnership or bona fide officer of a corporation to appear and represent the corporation). I will set a date for a telephonic prehearing conference after the Division submits evidence that the OIPs have been serviced in accordance with Rule 141.

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James E. Grimes  
Administrative Law Judge