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

ADMINISTRATIVE PROCEEDINGS RULINGS Release No. 2014 / November 13, 2014

ADMINISTRATIVE PROCEEDING File No. 3-16223

In the Matter of

SANDS BROTHERS ASSET MANAGEMENT, LLC, STEVEN SANDS, MARTIN SANDS, AND CHRISTOPHER KELLY

ORDER POSTPONING HEARING AND SCHEDULING PREHEARING CONFERENCE

The Securities and Exchange Commission commenced this proceeding on October 29, 2014, with an Order Instituting Administrative and Cease-and-Desist Proceedings (OIP) against Respondents, pursuant to Sections 203(e), 203(f), and 203(k) of the Investment Advisers Act of 1940. A hearing is scheduled for December 2, 2014.

The Division of Enforcement (Division) moves to adjourn the hearing and schedule a prehearing conference. The Division represents that Respondents have consented to its motion.

The Division's motion is GRANTED. The hearing scheduled for December 2, 2014, is POSTPONED *sine die*, and a telephonic prehearing conference shall be held on December 2, 2014, at 9:30 a.m. EST.

Cameron Elliot Administrative Law Judge