

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT ADVISERS ACT OF 1940
Release No. 5368 / September 25, 2019

ADMINISTRATIVE PROCEEDING
File No. 3-19513

In the Matter of

JOSEPH B. BRONSON,

Respondent.

ORDER INSTITUTING
ADMINISTRATIVE PROCEEDINGS
PURSUANT TO SECTION 203(f) OF THE
INVESTMENT ADVISERS ACT OF 1940,
MAKING FINDINGS, AND IMPOSING
REMEDIAL SANCTIONS

I.

The Securities and Exchange Commission (“Commission”) deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted pursuant to Section 203(f) of the Investment Advisers Act of 1940 (“Advisers Act”) against Joseph B. Bronson (“Respondent” or “Bronson”).

II.

In anticipation of the institution of these proceedings, Respondent has submitted an Offer of Settlement (the “Offer”) which the Commission has determined to accept. Solely for the purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, and without admitting or denying the findings herein, except as to the Commission’s jurisdiction over him and the subject matter of these proceedings and the findings contained in paragraph III.1 below, which is admitted, Respondent consents to the entry of this Order Instituting Administrative Proceedings Pursuant to Section 203(f) of the Investment Advisers Act of 1940, Making Findings, and Imposing Remedial Sanctions (“Order”), as set forth below.

III.

On the basis of this Order and Respondent's Offer, the Commission finds that

1. On August 21, 2019, a final judgment was entered by consent against Bronson, permanently enjoining him from future violations of Sections 17(a)(1) and 17(a)(2) of the Securities Act of 1933 [15 U.S.C. §77q(a)]; Section 10(b) of the Securities Exchange Act of 1934 [15 U.S.C. §78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5]; Sections 206(1), 206(2), 206(4), 207 of the Advisers Act [15 U.S.C. §§ 80b-6(1), (2), (4), 80b-7] and Rule 206(4)-7 thereunder [17 C.F.R. § 275.206(4)-7], in the civil action entitled Securities and Exchange Commission v. Strong Investment Management, et al., Civil Action Number 8:18-CV-00293-JLS, in the United States District Court for the Central District of California.

2. The Commission's complaint alleged, in substance, that from at least January 2012 through July 2016, Strong Investment Management ("Strong") and its co-founder, owner, president, and chief executive officer, Bronson, engaged in a fraudulent trade allocation scheme, or "cherry-picking," that harmed their advisory clients. It further alleged that during this time, Bronson aided and abetted Strong's failure to implement policies and procedures reasonably designed to prevent cherry-picking.

IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanctions agreed to in Respondent Bronson's Offer.

Accordingly, it is hereby ORDERED pursuant to Section 203(f) of the Advisers Act, that Respondent Bronson be, and hereby is barred from association with any investment adviser, broker, dealer, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization, provided, however, that Bronson may, for a period of 60 days, associate with Strong Investment Management ("Strong") for the purpose of winding down Strong's business.

Any reapplication for association by the Respondent will be subject to the applicable laws and regulations governing the reentry process, and reentry may be conditioned upon a number of factors, including, but not limited to, the satisfaction of any or all of the following: (a) any disgorgement ordered against the Respondent, whether or not the Commission has fully or partially waived payment of such disgorgement; (b) any arbitration award related to the conduct that served as the basis for the Commission order; (c) any self-regulatory organization arbitration award to a customer, whether or not related to the conduct that served as the basis for the Commission order;

and (d) any restitution order by a self-regulatory organization, whether or not related to the conduct that served as the basis for the Commission order.

By the Commission.

Vanessa A. Countryman
Secretary