

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 91628 / April 22, 2021

ADMINISTRATIVE PROCEEDING
File No. 3-20266

In the Matter of	:	
	:	
	:	ORDER INSTITUTING PUBLIC
	:	ADMINISTRATIVE PROCEEDINGS,
	:	MAKING FINDINGS AND IMPOSING
AMIT TANDON, Esq.	:	REMEDIAL SANCTIONS PURSUANT TO
	:	RULE 102(e) OF THE COMMISSION'S
	:	RULES OF PRACTICE
Respondent.	:	
	:	
	:	
	:	

I.

The Securities and Exchange Commission (“Commission”) deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted against Amit Tandon (“Respondent” or “Tandon”) pursuant to Rules 102(e)(3)(i)(A) of the Commission's Rules of Practice (17 C.F.R. § 201.102(e)(3)(i)(A)).¹

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

¹ Rule 102(e)(3)(i) provides, in relevant part, that:

The Commission, with due regard to the public interest and without preliminary hearing, may, by order, . . . suspend from appearing or practicing before it any attorney . . . who has been by name (A) [p]ermanently enjoined by any court of competent jurisdiction, by reason of his or her misconduct in an action brought by the Commission, from violating or aiding or abetting the violation of any provision of the Federal securities laws or of the rules and regulations thereunder; or (B) [f]ound by any court of competent jurisdiction in an action brought by the Commission to which he or she is a party . . . to have violated (unless the violation was found not to have been willful) or aided and abetted the violation of any provision of the Federal securities laws or of the rules and regulations thereunder.

the Commission's jurisdiction over him and the subject matter of these proceedings, and the findings contained in Section III below, which are admitted, Respondent consents to the entry of this Order Instituting Administrative Proceedings Pursuant to Rule 102(e) of the Commission's Rules of Practice, 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. Tandon, at all relevant times, was an attorney who was admitted to practice in the State of New York.

2. On November 8, 2018, the Commission filed an injunctive action against Tandon, his brother Ajay Tandon and SeeThruEquites, LLC ("SeeThru") in the United States District Court for the Southern District of New York, *SEC v. SeeThru Equity, LLC, et al.*, Civil Action No. 1:18-cv-10374-LSS (S.D.N.Y.),

3. The complaint alleged, among other things that Tandon and the other two defendants purported to issue independent, "unbiased," and "not paid for" research reports for small and microcap issuers. In fact, between January 2014 and November 2018, SeeThru received at least \$500,000 from the companies that it covered, mostly through fees that SeeThru charged the issuers to present at investor conferences organized by SeeThru. In addition, the complaint alleged that Tandon and his brother directed SeeThru employees to inflate the stock price targets for companies for which SeeThru published research reports.

4. On August 22, 2020, the United States District Court entered an order that, among other things, enjoined Tandon from future violations of Section 17(b) of the Securities Act of 1933, Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5 thereunder. Tandon consented to the entry of that injunction without admitting or denying the allegations of the complaint.

5. The Commission's claims against Tandon for disgorgement and prejudgment interest, civil penalties, conduct-based injunctions, and penny stock and officer and director bars remain pending in the federal court litigation.

IV.

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

Accordingly, it is hereby ORDERED pursuant to Rule 102(e)(3)(i) of the Commission's Rules of Practice, effectively immediately, that Tandon is suspended from appearing or practicing before the Commission as an attorney.

By the Commission.

Vanessa A. Countryman
Secretary