UNITED STATES OF AMERICA Before the SECURITIES AND EXCHANGE COMMISSION

INVESTMENT ADVISERS ACT OF 1940 Release No. 5737 / May 24, 2021

ADMINISTRATIVE PROCEEDING File No. 3-20328

In the Matter of

GEORGE HECKLER,

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 George Heckler ("Respondent" or "Heckler").

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, Respondent admits the Commission's jurisdiction over him and the subject matter of these proceedings, and the findings contained in paragraphs III.2 below, and 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. Heckler was associated with and controlled Cassatt Fund Partners LLC ("Cassatt Partners"), a Pennsylvania limited liability company established in 2006, which was the investment adviser to Cassatt Short Term Trading Fund LP ("Cassatt"). He was also associated with and controlled CV Fund Partners LLC ("CV Partners"), a Pennsylvania limited liability company established in 2010, which was the investment adviser to CV Special Opportunity Fund LP ("CV Special"). Through Cassatt Partners and CV Partners, Heckler provided investment advisory services to pooled investment vehicles, Cassatt and CV Special, for a fee. Heckler, Cassatt Partners, and CV Partners were not registered with the Commission. Heckler, 64 years old, resides in Charleston, South Carolina.
- 2. On March 9, 2021, the Commission filed a complaint against Heckler in <u>SEC v. Heckler</u> (Civil Action No. 21-cv-04587) in the United States District Court for the District of New Jersey. On April 21, 2021, the court entered an order permanently enjoining Heckler, by consent, from future violations of Section 17(a) of the Securities Act of 1933, Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5 thereunder, and Sections 206(1), 206(2), and 206(4) of the Advisers Act and Rule 206(4)-8 thereunder.
- 3. The Commission's complaint alleged, among other things, that, in connection with the purchase and sale of securities, Heckler, an associated person with Cassatt Partners and CV Partners, misused and misappropriated client funds; made materially false misrepresentations to investors; failed to state material facts necessary in order to make other statements made, in light of the circumstances under which they were made, not misleading; provided investors with false account statements indicating that investors' funds were fully invested and earning positive returns; and otherwise engaged in a variety of conduct which operated as a fraud and deceit on investors in Cassatt and CV Special.

IV.

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

Accordingly, it is hereby ORDERED pursuant to Section 203(f) of the Advisers Act, that Respondent Heckler be, and hereby is barred from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization; and

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, compliance with the Commission's order and payment of any or all of the following: (a) any disgorgement or civil penalties ordered by a Court against the

Respondent in any action brought by the Commission; (b) any disgorgement amounts ordered against the Respondent for which the Commission waived payment; (c) any arbitration award related to the conduct that served as the basis for the Commission order; (d) 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 (e) 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