

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT ADVISERS ACT OF 1940
Release No. 6109 / September 8, 2022

ADMINISTRATIVE PROCEEDING
File No. 3-21045

In the Matter of

BENJAMIN BIN CHOW,

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 Benjamin Bin Chow (“Respondent”).

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) and III(4) 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. Chow, age 48, formed Canyon Bridge Management Corp. (“Canyon Bridge Management”) in 2016. Canyon Bridge Management was a Commission-registered investment adviser that provided non-discretionary advice to Canyon Bridge Fund I, LP (“Canyon Bridge Fund”), a private investment fund organized in Delaware.

2. On August 25, 2022, a final judgment was entered by consent against Chow, permanently enjoining him from future violations of Sections 10(b) of the Exchange Act and Rule 10b-5 thereunder, in the civil action entitled Securities and Exchange Commission v. Yin, et al., Civil Action Number 1:17-cv-00972-JPO, in the United States District Court for the Southern District of New York.

3. The Commission’s complaint alleged that while working as the lead negotiator for Canyon Bridge Fund during talks to acquire Lattice Semiconductor Corp. (“Lattice”), Chow tipped a friend and former colleague, Shaohua Michael Yin, with material non-public information about the impending deal in violation of the antifraud provisions of the federal securities laws.

4. On April 24, 2018, Chow was convicted of one count of conspiracy to commit securities fraud in violation of Title 18 United States Code Section 371 and six counts of securities fraud in violation of Title 18 United States Code, Sections 78j(b) and 78ff and Title 17 of the Code of Federal Regulations, Section 240.10b-5 before the United States District Court for the Southern District of New York, in United States v. Benjamin Bin Chow, Case No. 1:17-cr-00667-GHW. On July 2, 2019, an amended judgment in the criminal case was entered against Chow. He was sentenced to a term of incarceration of 3 months, 2 years of supervised release, and ordered to pay restitution in the amount of \$1,383,477.18.

5. In connection with that conviction, the jury found that Chow had violated 18 U.S.C. § 371, conspiracy to commit securities fraud, and 18 U.S.C. §§ 78j(b) and 78ff and 17 C.F.R. § 240.10b-5, securities fraud.

IV.

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

Accordingly, it is hereby ORDERED pursuant to Section 203(f) of the Advisers Act, that Respondent Chow 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.

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