

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**INVESTMENT ADVISERS ACT OF 1940**  
**Release No. 6282 / April 12, 2023**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-21120**

**In the Matter of**

**TIMOTHY ALLCOTT,**

**Respondent.**

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

**I.**

On September 21, 2022, the Securities and Exchange Commission (“Commission”) instituted proceedings pursuant to Section 203(f) of the Investment Advisers Act of 1940 (“Advisers Act”) against Timothy Allcott (“Respondent” or “Allcott”).

**II.**

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 Section III, 2 below, which are admitted, Respondent consents to the entry of this Order Making Findings and Imposing Remedial Sanctions Pursuant to Section 203(f) of the Investment Advisers Act of 1940.

**III.**

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

1. Between July 2015 and January 2018, Allcott, 61 years of age, was associated with unregistered investment adviser ARO Equity, LLC (“ARO Equity”). Respondent is a resident of Peabody, Massachusetts.

2. On July 27, 2020, Allcott pleaded guilty to wire fraud in violation of Title 18 United States Code, Section 1349, before the United States District Court for the District of

Massachusetts in United States v. Allcott, et al., Crim. Information No. 20-cr-10109-GAO. Respondent has not yet been sentenced.

3. The single count of the criminal information to which Respondent pleaded guilty alleged, among other things, that ARO Equity was a self-described private investment firm that claimed to invest in various business ventures throughout New England. It alleged that Respondent was an equity owner and purported manager of ARO Equity. The criminal information alleged that Respondent and another person conspired to fraudulently solicit and raise funds from victims to invest with ARO Equity. It alleged that Respondent and his co-conspirator raised funds for ARO Equity through materially false and misleading statements to investors and misappropriated large portions of the investments. The criminal information alleged that the conspiracy caused investor losses of more than \$4 million.

#### IV.

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

Accordingly, it is hereby ORDERED:

Pursuant to Section 203(f) of the Advisers Act, Respondent shall 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