

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT ADVISERS ACT OF 1940
Release No. 6481 / November 8, 2023

ADMINISTRATIVE PROCEEDING
File No. 3-21795

In the Matter of

JEREMY SHOR,

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 Jeremy Shor (“Shor” or “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 Section III, paragraphs 2 and 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. Shor, age 51, resides in Brooklyn, New York. Shor worked at Premium Point Investments LP ("Premium Point"), a Delaware limited partnership and New York-based registered investment adviser, as a director and trader of non-agency securities from the spring of 2014 until he resigned in March 2016. Before working at Premium Point, Shor was associated with a broker-dealer registered with the Commission.

2. On November 7, 2023, a final judgment was entered by consent against Shor, permanently enjoining him from future violations of Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5(a) and (c) thereunder, Sections 17(a)(1) and (3) of the Securities Act of 1933, and Advisers Act Sections 206(1), (2), and (4) and Rule 206(4)-8(a)(2) thereunder, in the civil action entitled Securities and Exchange Commission v. Premium Point Investments LP, et al., 18 Civ. 4145 (JPC), in the United States District Court for the Southern District of New York.

3. The Commission's amended complaint alleged that, from at least September 2015 through March 2016, Shor participated in a fraudulent scheme to inflate the value of securities held by several private investment funds managed by Premium Point. The amended complaint further alleged that Shor and others at Premium Point sought to hide the funds' poor performance, both to stem redemptions and to persuade investors to invest in a new fund.

4. On April 22, 2022, Shor pleaded guilty to one count of securities fraud [15 U.S.C. §§ 78j(b) and 78ff; 17 C.F.R. § 240.10b-5] before the United States District Court for the Southern District of New York, in United States v. Ahuja, et al., 18 Cr. 328 (KPF) (S.D.N.Y.).

5. The count of the indictment to which Shor pleaded guilty alleged that Shor defrauded investors by participating in an effort to deceptively mismark the value of certain securities held by private funds Premium Point managed, and thus fraudulently inflated the net asset value of the funds as reported to investors.

IV.

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

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