

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

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 104913 / March 2, 2026**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-22481**

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<b>In the Matter of</b>	:	<b>ORDER APPOINTING FUND</b>
	:	<b>ADMINISTRATOR, SETTING</b>
<b>North East Asset Management</b>	:	<b>ADMINISTRATOR’S BOND AMOUNT,</b>
<b>Group, Inc. and Gregory A. Zandlo,</b>	:	<b>AND AUTHORIZING THE APPROVAL</b>
	:	<b>AND PAYMENT OF THE FEES AND</b>
<b>Respondents.</b>	:	<b>EXPENSES OF ADMINISTRATION</b>
_____	:	

On June 3, 2025, the Commission issued an Order Instituting Administrative and Cease-and-Desist Proceedings, Pursuant to Section 21(c) of the Securities Exchange Act of 1934, and Sections 203(e), 203(f), and 203(k) of the Investment Advisers Act of 1940, Making Findings, and Imposing Remedial Sanctions and a Cease-and-Desist Order (the “Order”) <sup>1</sup> against North East Asset Management Group, Inc. (“North East”) and Gregory A. Zandlo (“Zandlo”) (collectively, the “Respondents”). In the Order, the Commission found that between December 1, 2020, through May 31, 2022 (the “Relevant Period”), North East, a State of Minnesota-registered investment adviser, and Zandlo, North East’s sole principal, owner, and employee, engaged in cherry-picking when they disproportionately allocated certain profitable trades to accounts for North East, Zandlo, and individuals related to Zandlo, and allocated unprofitable trades to other North East advisory clients.

<sup>1</sup> Advisors Act Rel. No. 6881 (June 3, 2025).

The Commission ordered North East to pay \$10,609.00 in disgorgement and \$2,260.36 in prejudgment interest, and ordered Zandlo to pay \$80,599.00 in disgorgement, \$17,172.47 in prejudgment interest, and a \$141,000.00 civil money penalty, for a collective total of \$251,640.83, to the Commission. The Commission also created a Fair Fund, pursuant to Section 308(a) of the Sarbanes-Oxley Act of 2002, so the penalty collected, along with the disgorgement and prejudgment interest collected, can be distributed to harmed investors (the “Fair Fund”).

The Fair Fund consists of the \$251,640.83 collected from the Respondents. The Fair Fund has been deposited in a Commission-designated account at the U.S. Department of the Treasury, and any accrued interest will be added to the Fair Fund.

The Division of Enforcement (the “Division”) now seeks the appointment of KCC Class Action Services LLC (“KCC”) as the fund administrator and requests that the administrator’s bond be set at \$251,640.83. KCC is included in the Commission’s approved pool of administrators.

The Division further requests that the Commission authorize the Office of Financial Management (“OFM”), at the direction of an Assistant Director of the Office of Distributions, to pay the Fund Administrator’s fees and expenses from the Fair Fund, so long as the total amount paid to the Fund Administrator, including the invoice to be paid, does not exceed the total amount of the approved cost proposal submitted by the Fund Administrator.

Accordingly, IT IS HEREBY ORDERED that:

- A. KCC is appointed as the Fund Administrator, pursuant to Rule 1105(a) of the Commission’s Rules on Fair Fund and Disgorgement Plans (“Commission’s Rules”);<sup>2</sup>

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<sup>2</sup> 17 C.F.R. § 201.1105(a).

- B. KCC shall obtain a bond in accordance with Rule 1105(c) of the Commission's Rules,<sup>3</sup> in the amount of \$251,640.83;
- C. the Fund Administrator will submit invoices to the Commission staff for services rendered, in accordance with Rule 1105(d) of the Commission's Rules;<sup>4</sup> and
- D. at the direction of an Assistant Director of the Office of Distributions, OFM is authorized to pay the Fund Administrator's fees and expenses from the Fair Fund, in accordance with Rule 1105(e) of the Commission's Rules,<sup>5</sup> so long as the total amount paid to the Fund Administrator, including the invoice to be paid, does not exceed the total amount of the approved cost proposal submitted by the Fund Administrator.

For the Commission, by the Division of Enforcement, pursuant to delegated authority.<sup>6</sup>

Vanessa A. Countryman  
Secretary

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<sup>3</sup> 17 C.F.R. § 201.1105(c).

<sup>4</sup> 17 C.F.R. § 201.1105(d).

<sup>5</sup> 17 C.F.R. § 201.1105(e).

<sup>6</sup> 17 C.F.R. § 200.30-4(a)(17) and 17 C.F.R. § 200.30-4(a)(21)(vi).