

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 106000 / July 28, 2026

ADMINISTRATIVE PROCEEDING
File No. 3-21405

	:	
In the Matter of	:	ORDER DIRECTING DISBURSEMENT
	:	OF FAIR FUND
Pinnacle Investments, LLC,	:	
	:	
Respondent.	:	
	:	

On June 30, 2025, the Division of Enforcement, pursuant to delegated authority, published a Notice of Proposed Plan of Distribution and Opportunity for Comment (“Notice”),¹ pursuant to Rule 1103 of the Commission’s Rules on Fair Fund and Disgorgement Plans (“Commission’s Rules”);² and simultaneously posted the Proposed Plan of Distribution (the “Proposed Plan”). The Notice advised interested persons that they could obtain a copy of the Proposed Plan from the Commission’s public website or by submitting a written request to Sondra Panahi, United States Securities and Exchange Commission, 801 Brickell Ave, Suite 1950, Miami, FL 33131. The Notice also advised that all persons desiring to comment on the Proposed Plan could submit their comments, in writing, within 30 days of the Notice. The Commission received no comments on the Proposed Plan during the comment period.

¹ Exchange Act Rel. No. 103346 (June 30, 2025).

² 17 C.F.R. § 201.1103.

On July 11, 2025, the Commission issued an order appointing Simpluris, Inc., as the Fund Administrator to oversee the administration and distribution of the Fair Fund.³

On August 27, 2025, the Division of Enforcement, pursuant to delegated authority, issued an order approving the Modified Plan of Distribution,⁴ and posted the approved Modified Plan of Distribution (the “Plan”).⁵

The Plan provides for the distribution of the Fair Fund, plus accumulated interest, less taxes, fees, and expenses, to the harmed investors according to the methodology set forth in the Plan.

Pursuant to the Plan, the Fund Administrator has submitted a payment file to Commission staff with a reasonable assurances letter as to the completeness and accuracy of the information contained therein. The Commission staff has reviewed and accepted the payment file and requests, pursuant to Rule 1101(b)(6) of the Commission’s Rules, 17 C.F.R. § 201.1101(b)(6), that the Commission authorize the transfer of \$174,555.85 from the Fair Fund to the Fair Fund’s escrow account at Huntington National Bank for distribution by the Fund Administrator in accordance with the Plan.

Accordingly, it is hereby ORDERED, that Commission staff shall transfer \$174,555.85 from the Fair Fund to the Fair Fund’s escrow account, for a total distribution of \$174,555.85 by the Fund Administrator in accordance with the Plan.

For the Commission, by the Division of Enforcement, pursuant to delegated authority.⁶

Vanessa A. Countryman
Secretary

³ See Exchange Act Rel. No. 103441 (July 11, 2025)

⁴ See Exchange Act Rel. No. 103791 (Aug. 27, 2025)

⁵ The Proposed Plan was modified to name Simpluris, Inc. as the Fund Administrator.

⁶ 17 C.F.R. § 200.30-4(a)(21)(v).