

UNITED STATES OF AMERICA
before the
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT ADVISERS ACT OF 1940
Release No. 4180 / August 19, 2015

ADMINISTRATIVE PROCEEDING
File No. 3-16223

In the Matter of

SAND BROTHERS ASSET MANAGEMENT, LLC;
STEVEN SANDS;
MARTIN SANDS; and
CHRISTOPHER KELLY

ORDER GRANTING EXTENSION

Chief Administrative Law Judge Brenda P. Murray has moved, pursuant to Commission Rule of Practice 360(a)(3), for an extension of six months to issue the initial decision in these proceedings.¹ The initial decision is currently due by August 30, 2015.

We adopted Rule of Practice 360(a) to enhance the timely and efficient adjudication and disposition of Commission administrative proceedings by setting deadlines for issuance of an initial decision.² That rule provides for extensions of those deadlines under certain circumstances if supported by a motion from the Chief Administrative Law Judge and if we determine that "additional time is necessary or appropriate in the public interest."³ From our review of the present motion, it appears appropriate in the public interest to grant the Chief Administrative Law Judge's request and extend the time period for filing the initial decision.

¹ On October 29, 2014, we issued an Order Instituting Proceedings against Sand Brothers Asset Management, LLC, Steven Sands, Martin Sands, and Christopher Kelly, which provided for issuance of the initial decision within 300 days after service of the OIP. *Sands Brothers Asset Management, LLC*, Advisers Act Release No. 3960, 2014 WL 5464813 (Oct. 29, 2014).

² 17 C.F.R. § 201.360(a); see *Adopting Release*, Exchange Act Release No. 48018, 2003 WL 21354791, at *2 (June 11, 2003) ("[T]he Commission has determined that timely completion of proceedings can be achieved more successfully through the adoption of mandatory deadlines and procedures designed to meet these deadlines.").

³ 17 C.F.R. § 201.360(a)(3).

Accordingly, it is ORDERED that the deadline for filing the initial decision in these proceedings is extended to February 29, 2016.

By the Commission.

Brent J. Fields
Secretary