

UNITED STATES OF AMERICA
before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 102354 / February 5, 2025

INVESTMENT ADVISERS ACT OF 1940
Release No. 6846 / February 5, 2025

Admin. Proc. File No. 3-21849

In the Matter of

KEY INVESTMENT SERVICES LLC, and
KEYBANC CAPITAL MARKETS INC.

ORDER GRANTING EXTENSION OF TIME

On February 9, 2024, the Securities and Exchange Commission issued an order instituting administrative and cease-and-desist proceedings under Sections 15(b) and 21C of the Securities Exchange Act of 1934 and Sections 203(e) and 203(k) of the Investment Advisers Act of 1940, making findings, and imposing remedial sanctions and a cease-and-desist order against Key Investment Services LLC and KeyBanc Capital Markets Inc.¹ On January 30, 2025, the respondents filed a motion to modify the ordered undertakings, to stay the effectiveness of certain undertakings, and for an administrative stay. On February 3, 2025, the Division of Enforcement filed a request for a one-week extension of time to respond to the respondents' motion. Under the circumstances, it appears appropriate to grant the Division's request for good cause shown.²

Accordingly, it is ORDERED that the Division shall file its response to the respondents' motion by February 13, 2025.

¹ *Key Investment Services LLC*, Exchange Act Release No. 99500, 2024 WL 517497 (Feb. 9, 2024).

² See Rule of Practice 161(a), 17 C.F.R. § 201.161(a); *see also Pending Administrative Proceedings*, Exchange Act Release No. 88415, 2020 WL 1322001 (Mar. 18, 2020) (providing that, pending further order of the Commission, reasonable requests for extensions of time will not be disfavored as stated in Rule of Practice 161).

For the Commission, by its Secretary, pursuant to delegated authority.³

Vanessa A. Countryman
Secretary

³ 17 C.F.R. § 200.30-7(a)(4).