

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 68323 / November 29, 2012

INVESTMENT ADVISERS ACT OF 1940
Release No. 3507 / November 29, 2012

ADMINISTRATIVE PROCEEDING
File No. 3-15112

_____	:	ORDER INSTITUTING ADMINISTRATIVE
In the Matter of	:	PROCEEDINGS PURSUANT TO SECTION
	:	15(b) OF THE SECURITIES EXCHANGE ACT
ANGELO A. ALLECA,	:	OF 1934 AND SECTION 203(f) OF THE
	:	INVESTMENT ADVISERS ACT OF 1940,
Respondent.	:	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 15(b) of the Securities Exchange Act of 1934 (“Exchange Act”) and Section 203(f) of the Investment Advisers Act of 1940 (“Advisers Act”) against Angelo A. Alleca (“Respondent” or “Alleca”).

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, and without admitting or denying the findings herein, except as to the Commission’s jurisdiction over him and the subject matter of these proceedings and the findings contained in Section III.2 below, which are admitted, Respondent consents to the entry of this Order Instituting Administrative Proceedings Pursuant to Section 15(b) of the Securities Exchange Act of 1934 and 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. Alleca was the president, chief operating officer, and chief compliance officer of two investment advisers registered with the Commission: Summit Wealth Management, Inc. ("Summit Wealth Management"), based in Atlanta, Georgia, and Summit Wealth Partners, Inc., based in Orlando, Florida. Alleca owned both companies through National Advisory Services, Inc., a holding company. Alleca has been associated with various registered broker-dealers, including G-2 Trading, LLC, and Trend Trader, LLC, and has held FINRA securities licenses including series 3, 7, 8, 9, 10, 24, 28, 55, 63, and 65 licenses. Alleca, 42 years old, is a resident of Buffalo, New York and Atlanta, Georgia.

2. On September 19, 2012, an order was entered by consent against Alleca, permanently enjoining him from future violations of Section 17(a) of the Securities Act of 1933 ("Securities Act"), Section 10(b) of the Exchange Act and Rule 10b-5 thereunder, and Sections 206(1) and 206(2) of the Advisers Act, in the civil action entitled Securities and Exchange Commission v. Angelo A. Alleca, et al., Civil Action Number 1:12-cv-3261, in the United States District Court for the Northern District of Georgia.

3. The Commission's complaint alleged, in part, as follows: Alleca and Summit Wealth Management offered and sold interests in Summit Investment Fund, LP ("Summit Fund"), which they told their clients was operating as a fund-of-funds – meaning they were investing their money in other funds and investment products rather than directly in stocks and other securities. Alleca, instead, engaged in active securities trading with some of the money he raised from his clients for Summit Fund and he thereby incurred substantial losses. Alleca concealed the Summit Fund trading losses from investors and provided them with false account statements. Alleca subsequently created at least two additional hedge funds to raise money from Summit Wealth Management clients – Private Credit Opportunities Fund, LLC ("Credit Fund") and Asset Class Diversification Fund, LP ("Asset Fund"). Alleca planned to – and did – illegally misappropriate monies raised from the new funds in a Ponzi-like fashion in order to meet redemption requests in Summit Fund. Alleca's plan to cover up the losses in Summit Fund was unsuccessful because Credit Fund and Asset Fund incurred further trading losses. Alleca continued to issue false account statements to investors in Summit Fund, and he also issued false account statements to investors in Credit Fund and Asset Fund in order to hide the actual losses on the clients' investments. Alleca raised approximately \$17 million from approximately 200 clients of Summit Wealth Management and dissipated virtually all of this sum in connection with his scheme.

IV.

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

Accordingly, it is hereby ORDERED pursuant to Section 15(b)(6) of the Exchange Act and Section 203(f) of the Advisers Act that Respondent Alleca 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; and

barred from participating in any offering of a penny stock, including: acting as a promoter, finder, consultant, agent or other person who engages in activities with a broker, dealer or issuer for purposes of the issuance or trading in any penny stock, or inducing or attempting to induce the purchase or sale of any penny stock.

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, the satisfaction of any or all of the following: (a) any disgorgement ordered against the Respondent, whether or not the Commission has fully or partially waived payment of such disgorgement; (b) any arbitration award related to the conduct that served as the basis for the Commission order; (c) 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 (d) 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.

Elizabeth M. Murphy
Secretary