

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

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 97312 / April 14, 2023**

**INVESTMENT ADVISERS ACT OF 1940**  
**Release No. 6285 / April 14, 2023**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-21370**

**In the Matter of**  
  
**AMIN MAJIDI,**  
  
**Respondent.**

**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**

**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 Amin Majidi (“Majidi” or “Respondent”).

**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, Respondent admits the Commission’s jurisdiction over him and the subject matter of these proceedings, and the findings contained in Section III, paragraphs 2 and 4 below, and 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. Majidi, age 56, resides in Armonk, New York. From November 2008 to June 2016, Majidi worked at Premium Point Investments LP (“Premium Point”), a Delaware limited partnership and New York-based Commission-registered investment adviser, initially as its chief risk officer and, beginning in 2014, as the portfolio manager of one of its funds. Before, during, and after working at Premium Point, including from March 2010 to July 2016, Majidi was associated with several broker-dealers registered with the Commission.

2. On April 11, 2023, a final judgment was entered by consent against Majidi, permanently enjoining him from future violations of Exchange Act Section 10(b) and Rule 10b-5(a) and (c) thereunder, Sections 17(a)(1) and (3) of the Securities Act of 1933, and Advisers Act Sections 206(1), (2), and (4) and Rule 206(4)-8(a)(2) thereunder, in the civil action entitled Securities and Exchange Commission v. Premium Point Investments LP, et al., 18 Civ. 4145 (JPC), in the United States District Court for the Southern District of New York.

3. The Commission’s amended complaint alleged that, from at least September 2015 through March 2016, Majidi participated in a fraudulent scheme to inflate the value of securities held by several private investment funds managed by Premium Point. The amended complaint further alleged that Majidi and others at Premium Point sought to hide the funds’ poor performance, both to stem redemptions and to persuade investors to invest in a new fund.

4. On October 31, 2018, Majidi pleaded guilty to one count of securities fraud [15 U.S.C. §§ 78j(b) and 78ff; 17 C.F.R. § 240.10b-5], one count of conspiracy to commit securities fraud [18 U.S.C. § 371], one count of wire fraud [18 U.S.C. § 1343], and one count of conspiracy to commit wire fraud [18 U.S.C. § 1349] before the United States District Court for the Southern District of New York, in United States v. Ahuja et al., 18 Cr. 328 (KPF) (S.D.N.Y.).

5. The counts of the indictment to which Majidi pleaded guilty alleged that Majidi defrauded investors by participating in an effort to deceptively mismark the values of certain securities held by private funds Premium Point managed, and thus fraudulently inflated the net asset values of the funds as reported to investors.

### IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanctions agreed to in Respondent Majidi’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 Majidi 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.

Pursuant to Section 15(b)(6) of the Exchange Act, Respondent Majidi be, and hereby is 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, compliance with the Commission's order and payment of any or all of the following: (a) any disgorgement or civil penalties ordered by a Court against the Respondent in any action brought by the Commission; (b) any disgorgement amounts ordered against the Respondent for which the Commission waived payment; (c) any arbitration award related to the conduct that served as the basis for the Commission order; (d) 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 (e) 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.

Vanessa A. Countryman  
Secretary