

UNITED STATES OF AMERICA  
BEFORE THE  
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT ADVISERS ACT OF 1940  
Release No. 5505 / May 20, 2020

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In the Matter of :  
 :  
Edmunds Private Capital, LLC :  
10831 Ridgefield Parkway :  
Richmond, Virginia 23233 :  
 :  
(803-00246) :  
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ORDER UNDER SECTION 202(a)(11)(H) OF THE INVESTMENT ADVISERS ACT OF 1940

Edmunds Private Capital, LLC (the “Applicant”) filed an application on April 13, 2018, and amendments thereto on October 17, 2018, April 11, 2019, September 23, 2019, December 19, 2019, and January 29, 2020 for an order under section 202(a)(11)(H) of the Investment Advisers Act of 1940 (“Act”). The order would declare Applicant to be a person not within the intent of section 202(a)(11) of the Act, which defines the term “investment adviser.”

On April 24, 2020, a notice of the filing of the application was issued (Investment Advisers Act Release No. IA-5488). The notice gave interested persons an opportunity to request a hearing and stated that an order granting the application would be issued unless a hearing was ordered. No request for a hearing has been filed, and the Commission has not ordered a hearing.

The matter has been considered and it is found, on the basis of the information set forth in the application and the amendments thereto, that Applicant is a person not within the intent of section 202(a)(11) of the Act. Accordingly,

IT IS ORDERED, under section 202(a)(11)(H) of the Act, that the requested exemption by the Applicant (File No. 803-00246) is hereby granted, effective immediately, subject to the conditions in the application as amended.

For the Commission, by the Division of Investment Management, under delegated authority.

J. Matthew DeLesDernier  
Assistant Secretary