

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT ADVISERS ACT OF 1940
Release No. 4873 / April 2, 2018

In the Matter of

Ajenifuja Investments, LLC
5226 Klinge Street NW
Washington, DC 20016

File No. 801-99358

**Order Granting Hearing on
Cancellation and Scheduling
Filing of Statements**

On November 29, 2016, the Division of Investment Management (“Division”), for the Securities and Exchange Commission (“Commission”) pursuant to delegated authority, issued a notice of intention (the “Notice”) to cancel the registration of Ajenifuja Investments, LLC, hereinafter referred to as the registrant, under Section 203(h) of the Investment Advisers Act of 1940 (the “Act”).¹ Section 203(h) provides, in pertinent part, that if the Commission finds that any person registered under Section 203, or who has pending an application for registration filed under that section, is no longer in existence, is not engaged in business as an investment adviser, or is prohibited from registering as an investment adviser under Section 203A, the Commission shall, by order, cancel the registration of such person.

The registrant is registered with the Commission in reliance on rule 203A-2(e) under the Act, which provides an exemption from the prohibition on registration for an adviser that provides investment advice to all of its clients exclusively through the adviser’s interactive website, except that the adviser may advise fewer than 15 clients through other means during the preceding 12 months. The Notice stated the Commission’s belief that the registrant did not, at the time of its Form ADV filings and thereafter, advise clients through an interactive website, and that the registrant is therefore prohibited from registering as an investment adviser under Section 203A of the Act.² On December 28, 2016, the registrant submitted a request for an in-person hearing.³

¹ In the Matter of Ajenifuja Investments, LLC, Investment Advisers Act Release No. 4576 (Nov. 29. 2016).

² *Id.*

³ The registrant submitted the hearing request via email to Division staff on December 28, 2016.

The Commission finds that the registrant raised a material issue of law relevant to issues the Commission must consider in deciding to cancel the registration pursuant to rule 0-5 under the Act – specifically, whether an adviser may rely on rule 203A-2(e) to be registered with the Commission without having an operational interactive website or engaging in business as an investment adviser.⁴ Further, the Commission hereby establishes that the registrant may file an additional written statement regarding the potential cancellation of its registration.⁵ The written statement should address, among any other issues the registrant deems appropriate, whether an adviser may rely on rule 203A-2(e) to be registered with the Commission without having an operational interactive website or engaging in business as an investment adviser. The written statement should not exceed 20 double-spaced pages, including exhibits, with a minimum 12-point font size. The written statement should be submitted to the Commission on or before April 23, 2018 at 5:30 P.M. Any such written statement should be addressed to: Secretary, Securities and Exchange Commission, 100 F Street, NE, Washington, D.C. 20549.

This process will provide an opportunity for the Commission to fully assess the issues that the registrant raised. The registrant is hereby notified that any arguments related to the cancellation of registrant’s registration that are not discussed in the written statement shall be deemed waived. Further, the Commission has determined that the presentation of facts and legal arguments would not be significantly aided by oral argument.

Accordingly, IT IS ORDERED, that pursuant to rule 0-5(c) under the Act, the registrant’s request for a hearing on the cancellation is granted.

It is further ORDERED that on or before April 23, 2018 at 5:30 P.M., the registrant may submit to the Commission an additional written statement regarding cancellation in accordance with this order.

By the Commission.

Brent J. Fields
Secretary

⁴ 17 CFR 275.0-5(c). Rule 0-5(c) provides that the Commission will order a hearing on a matter, upon the request of an interested person or upon its own motion, if it appears that a hearing is “necessary or appropriate in the public interest or for the protection of investors.”

⁵ 17 CFR 201.451(a) (“...The Commission will consider appeals, motions and other matters properly before it on the basis of the papers filed by the parties without oral argument unless the Commission determines that the presentation of facts and legal arguments in the briefs and record and the decisional process would be significantly aided by oral argument.”)