

SECURITIES AND EXCHANGE COMMISSION

Release No. IA-5688

NOTICE OF INTENTION TO CANCEL REGISTRATIONS OF CERTAIN INVESTMENT ADVISERS PURSUANT TO SECTION 203(h) OF THE INVESTMENT ADVISERS ACT OF 1940

February 22, 2021

Notice is given that the Securities and Exchange Commission (the “Commission”) intends to issue an order or orders, pursuant to section 203(h) of the Investment Advisers Act of 1940 (the “Act”), cancelling the registrations of the investment advisers whose names appear in the attached Appendix, hereinafter referred to as the “registrants.”

Section 203(h) of the Act 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.

Each registrant listed in the attached Appendix either (a) has not filed a Form ADV amendment with the Commission as required by rule 204-1 under the Act¹ and appears to be no longer engaged in business as an investment adviser or (b) has indicated on Form ADV that it is no longer eligible to remain registered with the Commission as an investment adviser but has not

¹ Rule 204-1 under the Act requires any adviser that is required to complete Form ADV to amend the form at least annually and to submit the amendments electronically through the Investment Adviser Registration Depository.

filed Form ADV-W to withdraw its registration. Accordingly, the Commission believes that reasonable grounds exist for a finding that these registrants are no longer in existence, are not engaged in business as investment advisers, or are prohibited from registering as investment advisers under section 203A, and that their registrations should be cancelled pursuant to section 203(h) of the Act.

Notice is also given that any interested person may, by March 19, 2021, at 5:30 P.M., submit to the Commission in writing a request for a hearing on the cancellation of the registration of any registrant listed in the attached Appendix, accompanied by a statement as to the nature of such person's interest, the reason for such person's request, and the issues, if any, of fact or law proposed to be controverted, and the writer may request to be notified if the Commission should order a hearing thereon. Any such communication should be e-mailed to the Commission's Secretary at Secretarys-Office@sec.gov.

At any time after March 19, 2021, the Commission may issue an order or orders cancelling the registrations of any or all of the registrants listed in the attached Appendix, upon the basis of the information stated above, unless an order or orders for a hearing on the cancellation shall be issued upon request or upon the Commission's own motion. Persons who requested a hearing, or who requested to be advised as to whether a hearing is ordered, will receive any notices and orders issued in this matter, including the date of the hearing (if ordered) and any postponements thereof. Any registrant whose registration is cancelled under delegated authority may appeal that

decision directly to the Commission in accordance with rules 430 and 431 of the Commission's rules of practice (17 CFR 201.430 and 431).

ADDRESS: The Commission: Secretarys-Office@sec.gov.

FOR FURTHER INFORMATION CONTACT: Lawrence Pace, Senior Counsel, at 202-551-6999; SEC, Division of Investment Management, Investment Adviser Regulation Office, 100 F Street, NE, Washington, DC 20549-8549.

For the Commission, by the Division of Investment Management, pursuant to delegated authority.²

J. Matthew DeLesDemier
Assistant Secretary

[Appendix follows on next page]

² 17 CFR 200.30-5(e)(2).

APPENDIX:

SEC Number	Full Legal Name
801-80706	ATLANTIS ASSET MANAGEMENT INTERNATIONAL CORP.
801-80669	BLUE SHORES CAPITAL MANAGEMENT LLC
801-107925	BRISTOL ADVISORS, LLC
801-28037	BUSH O'DONNELL INVESTMENT ADVISORS, INC
801-96240	CLINK SAVINGS INC.
801-80697	COPPIN COLLINGS LIMITED
801-44774	EAST PACIFIC INVESTMENT CO INC
801-108051	EMPEROR TREE CAPITAL LIMITED
801-107673	ETHIKA INVESTMENTS, LLC
801-107890	EVA CAPITAL MANAGEMENT LP
801-57393	FINANCIAL WEST INVESTMENT GROUP, INC.
801-77028	FINLES N.V.
801-71707	FINVASIA FINANCIAL SERVICES PVT LTD
801-79943	FOREFRONT CAPITAL ADVISORS, LLC
801-66757	HARDING ADVISORY LLC
801-61820	HIGH PERCH LLC
801-61381	INDEPENDENT PORTFOLIO CONSULTANTS, INC.
801-50509	INTEGRATED WEALTH MANAGEMENT, INC.
801-108178	IPC PRIVATE WEALTH PARTNERS, LLC
801-81034	KATZ FAMILY FINANCIAL ADVISORS, LLC
801-115109	KEE MULTI FAMILY OFFICE CORP.
801-68831	LEBENTHAL ASSET MANAGEMENT, LLC
801-79208	LEBENTHAL PARTNERS LLC
801-78930	LEBENTHAL WEALTH ADVISORS, LLC
801-57974	MARKETOCRACY CAPITAL MANAGEMENT LLC
801-108510	MILLENNIUM CAPITAL PARTNERS LTD.
801-111687	MOONWALK CAPITAL LLC
801-114916	POWERSCALE CAPITAL MANAGEMENT, LLC
801-79356	QUANTMETRICS CAPITAL MANAGEMENT LLP
801-36999	RENN CAPITAL GROUP, INC.
801-110578	RETIREMENT INCOME SECURITY SOLUTIONS, LLC
801-78597	SAPPHIRE CAPITAL MANAGEMENT, LTD.
801-113600	SECOND NATURE INVESTMENTS LLC
801-108811	SL2 INVESTMENTS LLC
801-115294	SLATE CREEK CAPITAL, LLC
801-112406	SOLARA INVESTMENT ADVISORS LLC
801-81062	STARBOARD ASSET MANAGEMENT, INC.
801-107824	STAUFFER, ADAM WILLIAM
801-112934	STOCKPITCH FINANCIAL CORPORATION
801-47405	TONG ROBERT WAI
801-117662	TRIDENT OS, LLC
801-117680	UNICREDIT FINANCIAL SERVICES AND INVESTMENT ADVISOR
801-113476	VENROTH PRINCIPAL MANAGEMENT

801-74490	WEALTH MANAGEMENT, LLC
801-110776	XENON PRIVATE EQUITY LTD