

1 CLOTHILDE V. HEWLETT  
Commissioner  
2 MARY ANN SMITH  
Deputy Commissioner  
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11 BEFORE THE DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION  
12 OF THE STATE OF CALIFORNIA  
13

14 In the Matter of: ) CRD NO. 310204  
15 )  
16 THE COMMISSIONER OF FINANCIAL )  
PROTECTION AND INNOVATION, )  
17 Complainant, ) ORDER SUMMARILY SUSPENDING  
18 v. ) INVESTMENT ADVISER  
EEH INVESTMENTS, LLC, ) CERTIFICATE  
19 ) (Corp. Code, § 25242, subdivision (c))  
20 Respondent. )  
21 )

22 The Commissioner of Financial Protection and Innovation (Commissioner) finds:

- 23 1. EEH INVESTMENTS, LLC (EEH INVESTMENTS), is a California Limited  
24 Liability Company with its principal place of business at 1025 FOLSOM RANCH DRIVE UNIT  
25 302, FOLSOM, CA 95630.  
26 2. On January 21, 2021, the Commissioner issued an investment adviser certificate to  
27 EEH INVESTMENTS pursuant to Corporations Code section 25230, Central Registration  
28 Depository (CRD) Number 310204.

1           3.       HAHLBECK, KIRK, ALDEN, CRD Number 179193, is the owner of EEH  
2 INVESTMENTS.

3           4.       According to the Investment Adviser Registration Depository (IARD), investment  
4 adviser has not filed an annual updating amendment to its Form ADV for 2021. Pursuant to  
5 California Code of Regulations, title 10, section 260.241.4, subdivision (e), a licensed investment  
6 adviser shall file an annual updating amendment, in accordance with the instruction in Form ADV,  
7 with IARD in accordance with its procedures for transmission to the Commissioner within ninety  
8 (90) days of the end of the investment adviser’s fiscal year.

9           5.       By March 31, 2022, the investment adviser had not updated its Form ADV on IARD.

10          6.       On September 8, 2022, the Commissioner issued an Order to Discontinue Violation  
11 against EEH INVESTMENTS and served it by certified mail return receipt and electronic mail.

12          7.       To date, the Commissioner still has not received a response from EEH  
13 INVESTMENTS and EEH INVESTMENTS is in violation of the Order to Discontinue Violation.

14          8.       The Commissioner finds that EEH INVESTMENTS violated Cal. Code of Regs., tit.  
15 10, section 260.241.4, subdivision (e), investment advisers are required to file any report required  
16 under Corporations Code section 25241 within 10 days after notice by the Commissioner that the  
17 report is due.

18          9.       Under Corporations Code section 25242, subdivision (c)(2), the Commissioner may  
19 summarily suspend the certificate of the investment adviser if the investment adviser fails to file any  
20 report required under Cal. Code of Regs., tit. 10, section 260.241.4 and Corporations Code section  
21 25241 within 10 days after notice by the Commissioner that the report is due.

22          10.       Under Corporations Code section 25242, subdivision (c)(6), the Commissioner may  
23 summarily suspend the certificate the investment adviser if the investment adviser fails to maintain  
24 records as required by Cal. Code of Regs., tit. 10, section 260.241.4 and Corporations Code section  
25 25241.

26               NOW, BASED UPON THE FOREGOING AND GOOD CAUSE APPEARING, IT IS  
27 HEREBY ORDERED under Corporations Code section 25242, subdivision (c), that the investment  
28 adviser certificate of EEH INVESTMENTS, LLC is summarily suspended for thirty (30) days. This

1 Order is effective immediately. EEH INVESTMENTS, LLC is precluded from soliciting or  
2 facilitating new business, including existing clients. This summary suspension does not preclude  
3 EEH INVESTMENTS, LLC from engaging in activities necessary to wind down the business, such  
4 as liquidating transactions, transferring accounts, forwarding checks received to the clearing firm,  
5 responding to regulatory inquiries, filing Form U-5s for registered representatives, fielding client  
6 requests for account servicing or documents, for up to 30 days after the date of this Order.

7 The Commissioner finds this action is appropriate, in the public interest, for the protection of  
8 investors, and consistent with the purposes fairly intended by the policies and procedures of the  
9 Corporate Securities Law of 1968 (Corp. Code, § 25000 et seq.).

10 Dated: November 7, 2022

CLOTHILDE V. HEWLETT  
Commissioner of Financial Protection and Innovation



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12  
13 By: \_\_\_\_\_  
14 BALBIRO KAZLA  
15 Deputy Commissioner  
16 Broker-Dealer Investment Adviser  
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