

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 REVOKING
18 v.) INVESTMENT ADVISER CERTIFICATE
19 EEH INVESTMENTS, LLC,) (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 Liability
24 Company with its principal place of business at 1025 Folsom Ranch Drive Unit 302, Folsom, CA
25 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 Depository
28 (CRD) Number 310204.

1 3. Kirk Alden Hahlbeck, CRD Number 1791931, is the owner of EEH Investments.

2 4. Pursuant to California Code of Regulations, title 10, section 260.241.4, subdivision
3 (e), a licensed investment adviser shall file an annual updating amendment, in accordance with the
4 instruction in Form ADV, with IARD in accordance with its procedures for transmission to the
5 Commissioner within ninety (90) days of the end of the investment adviser’s fiscal year.

6 5. Corporations Code section 25241 requires an Investment Adviser to file any report
7 and to maintain records as required by Commissioner.

8 6. On June 30, 2022 the Commissioner instructed EEH Investments to file an annual
9 updating amendment to its Form ADV in the Investment Adviser Registration Depository (IARD)
10 no later than 30 days after June 30, 2022 to be in compliance with the law.

11 7. According to the IARD, EEH Investments has not filed an annual updating
12 amendment to its Form ADV for 2021 as requested by the Commissioner.

13 8. On September 8, 2022, the Commissioner issued an Order to Discontinue Violation
14 against EEH Investments and served it by certified mail return receipt and electronic mail.

15 9. To date, the Commissioner still has not received a response from EEH Investments
16 and EEH Investments is in violation of the Order to Discontinue Violation.

17 10. On November 7, 2022, the Commissioner issued an Order Summarily Suspending
18 Investment Adviser Certificate (Suspension Order) against EEH Investments and served it by
19 certified mail return receipt and electronic mail.

20 11. To date, the Commissioner still has not received a response from EEH Investments
21 and EEH Investments is in violation of the Suspension Order.

22 12. The Commissioner finds that EEH Investments violated Corporations Code section
23 25241 by failing to file any report required under section 25241 within 10 days after notice by the
24 Commissioner that the report is due.

25 13. The Commissioner finds that EEH Investments violated Corporations Code section
26 25241 by failing to maintain records as required by Commissioner.

27 14. The Commissioner finds that EEH Investments violated California Code of
28 Regulations, title 10, section 260.241.4, subdivision (e), by failing to file an annual updating

1 amendment, in accordance with the instruction in Form ADV, with IARD in accordance with its
2 procedures for transmission to the Commissioner within ninety (90) days of the end of the
3 investment adviser’s fiscal year

4 15. Pursuant Corporations Code section 25242, subdivision (c)(2) and (c)(6) the
5 Commissioner may summarily revoke the certificate of the Investment Adviser if the Investment
6 Adviser fails to file any report required under section 25241 within 10 days after notice by the
7 Commissioner that the report is due and or fails to maintain records as required by the
8 Commissioner.

9 NOW, BASED UPON THE FOREGOING AND GOOD CAUSE APPEARING, IT IS
10 HEREBY ORDERED under Corporations Code section 25242, subdivision (c), that the Investment
11 Adviser certificate of EEH Investments, LLC is summarily revoked. This Order is effective
12 immediately. EEH Investments, LLC is precluded from soliciting or facilitating new business,
13 including existing clients. This summary suspension does not preclude EEH Investments, LLC from
14 engaging in activities necessary to wind down the business, such as liquidating transactions,
15 transferring accounts, forwarding checks received to the clearing firm, responding to regulatory
16 inquiries, filing Form U-5s for registered representatives, fielding client requests for account
17 servicing or documents, for up to 60 days after the date of this Order.

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

21 Dated: December 19, 2022

CLOTHILDE V. HEWLETT
Commissioner of Financial Protection and Innovation



22
23 By: _____
24 BALBIRO KAZLA
25 Deputy Commissioner
26 Broker-Dealer Investment Adviser Division
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