UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 89785 / September 8, 2020

ADMINISTRATIVE PROCEEDING
File No. 3-19965

In the Matter of Alexander S. Gould, Respondent.	ORDER DIRECTING PAYMENT OF CERTAIN FUNDS RECEIVED BY THE COMMISSION

On September 8, 2020, the Securities and Exchange Commission ("Commission") issued an Order (the "Order")[1] that simultaneously instituted and settled public administrative and cease-and-desist proceedings against Alexander S. Gould ("Gould"). The Commission found that in 2018, Gould, an investment adviser to a private fund, diverted the fund's money to pay for his personal expenses, in violation of Sections 206(1) and 206(2) of the Investment Advisers Act of 1940 (the "Advisers Act"). The Commission ordered Gould to cease and desist from committing or causing any violations and any future violations of Sections 206(1) and 206(2) of the Advisers Act. The Commission also ordered that Gould be

(i) barred from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization, and

(ii) prohibited from serving or acting as an employee, officer, director, member of an advisory board, investment adviser or depositor of, or principal underwriter for, a registered investment company or affiliated person of such investment adviser, depositor, or principal underwriter,

with the right to apply for reentry after five (5) years to the appropriate self-regulatory organization, or if there is none, to the Commission. The Commission further ordered Gould to pay disgorgement of $476,033.19, prejudgment interest of $50,137.33, and civil penalties of $200,000. The Commission created a Fair Fund (the "Fair Fund") pursuant to Section 308(a) of the Sarbanes-Oxley Act of 2002 so the disgorgement, prejudgment interest, and civil penalty could be

[1] Investment Advisers Act Rel. No. 5574 (Sept. 8, 2020).

distributed to the investors that were harmed by Gould's violations as described in the Order (the "Investors").

The payment of disgorgement, prejudgment interest, and civil penalty constitutes a qualified settlement fund ("QSF") under Section of 468B(g) of the Internal Revenue Code (IRC), 26 U.S.C. § 468B(g), and related regulations, 26 C.F.R. §§ 1.468B-1 through 1.468B-5.

After receipt of the disgorgement, interest, and penalty amounts referenced above, the Commission staff will seek the appointment of a tax administrator to establish a reserve for taxes and related administrative expenses (the "Reserve"). Upon establishing and withholding the Reserve, the Commission staff shall disburse $526,169.01 to the Investors, which is the total loss to the Investors due to the violations described in the Order as determined by the Commission staff, plus reasonable interest.[2] The distribution to each Investor as determined by the Commission staff is reflected in Exhibit 1. After the distribution payments and all taxes and administrative expenses are paid, the Commission staff will transfer the remaining funds, if any, that are infeasible to return to investors, to the general fund of the United States Treasury subject to Section 21F(g)(3) of the Securities Exchange Act of 1934 ("Exchange Act").

Accordingly, it is ORDERED that:

A. After the receipt of funds simultaneously ordered in this proceeding, the Commission staff shall seek the appointment of a tax administrator to, among other things, comply with tax-related obligations of the QSF and establish the Reserve;

B. After withholding the Reserve, the Commission staff shall disburse $526,169.01 to the Investors as set forth in Exhibit 1; and

C. Any amounts remaining in the Fair Fund after completion of A and B above, that are infeasible to return to investors, and any amounts returned to the Fair Fund in the future that are infeasible to return to investors, shall be transferred to the general fund of the U.S. Treasury, subject to Section 21F(g)(3) of the Exchange Act.

By the Commission.

Vanessa A. Countryman
Secretary

[2] This amount includes reasonable interest calculated using the short-term Applicable Federal Rate plus three percentage points, compounded quarterly from July 25, 2018, through June 30, 2020.

Exhibit 1

Investor	Amount
Investor A	$169,740.70
Investor B	$84,870.35
Investor C	$67,896.28
Investor D	$135,765.40
Investor E	$33,948.14
Investor F	$33,948.14
Total	$526,169.01