

UNITED STATES OF AMERICA  
BEFORE THE  
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT ADVISERS ACT OF 1940  
Release No. 5708; March 26, 2021

ORDER CANCELLING REGISTRATIONS OF CERTAIN INVESTMENT ADVISERS  
PURSUANT TO SECTION 203(h) OF THE INVESTMENT ADVISERS ACT OF 1940

The investment advisers whose names appear in the attached Appendix, hereinafter referred to as the “registrants,” are registered as investment advisers pursuant to section 203 of the Investment Advisers Act of 1940.

On February 22, 2021, a notice of intention to cancel registrations of certain investment advisers, including the registrants, was issued (Investment Advisers Act Release No. 5688). The notice gave interested persons an opportunity to request a hearing and stated that an order or orders cancelling the registrations would be issued unless a hearing was ordered. No request for a hearing has been filed, and the Commission has not ordered a hearing.

The Commission has found that the 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 of the Investment Advisers Act of 1940.

Accordingly,

IT IS ORDERED, pursuant to section 203(h) of the Investment Advisers Act of 1940, that the registration of each of said registrants be, and hereby is, cancelled.

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

J. Matthew DeLesDernier  
Assistant Secretary

*[Appendix follows on next page]*

## APPENDIX:

<b>SEC Number</b>	<b>Full Legal Name</b>
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
801-115109	KEE MULTI FAMILY OFFICE CORP.
801-68831	LEBENTHAL ASSET MANAGEMENT, LLC
801-79208	LEBENTHAL PARTNERS LLC
801-78930	LEBENTHAL WEALTH ADVISORS, 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
801-112406	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