UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-21405

In the Matter of
Pinnacle Investments, LLC
Respondent.

PLAN NOTICE FOR THE PINNACLE FAIR FUND

TO: Persons and entities, or their lawful successors, who may have suffered a loss as a result of paying management advisory fees to Pinnacle Investments, LLC from January 1, 2015, through December 31, 2018 (the "Relevant Period").

If you paid management advisory fees to Pinnacle during the Relevant Period and you would like to be considered for eligibility to share in the Fair Fund distribution, you must complete and submit a Certification Form online at the Pinnacle Fair Fund website www.PinnacleFairFund.com on or before 11:59 p.m. Eastern Standard Time on October 17, 2025 (the "Certification Form Deadline"). You can also submit a Certification Form by mail, in which case the completed Certification Form must be postmarked (or if not sent by U.S. Mail, received) by the Certification Form Deadline.

I. PURPOSE OF THIS PLAN NOTICE

The purpose of this Plan Notice is to inform you that you may be eligible to share in the proceeds of Pinnacle Fair Fund described herein. To be considered for eligibility to share in the Pinnacle Fair Fund, you must file a Certification Form in accordance with the steps set forth in this Plan Notice and in the SEC-approved Plan of Distribution (the "Plan").[1]

Copies of the Plan, this Plan Notice and other relevant documents are available for download on the Pinnacle Fair Fund website at www.PinnacleFairFund.com and on the SEC's webpage for this matter: https://www.sec.gov/enforcement-litigation/distributions-harmed-investors/matter-pinnacle-investments-llc-admin-proc-file-no-3-21405. You may also request a copy of the Plan, this Plan Notice, and/or the Certification Form by contacting the Fund Administrator, Simpluris, Inc. (the "Fund Administrator"), by email at info@PinnacleFairFund.com, or by calling 833-360-6854.

Certain persons are excluded from eligibility for distribution under the Plan, as summarized in Section III of this Plan Notice.

PLEASE NOTE: Receipt of this Plan Notice does not mean you are an Eligible Claimant; eligibility will be determined by the Fund Administrator in accordance with the Plan. Please read this Plan Notice carefully and in its entirety. This Plan Notice contains important information regarding your possible eligibility to share in the Pinnacle Fair Fund if you timely complete and submit a Certification Form by the Certification Form Deadline of October 17, 2025, by 11:59 p.m. EST.

II. BACKGROUND

On May 5, 2023, the SEC instituted and simultaneously settled administrative and cease-and-desist proceedings (the "Order") against Pinnacle Investments, LLC ("Pinnacle" or the "Respondent"). In the Order, the SEC found that Pinnacle, a registered investment adviser and broker-dealer, made false and misleading statements in SEC filings regarding reviews

[1] Capitalized terms used in this Plan Notice but not defined are defined in the Plan.

of advisory client accounts; failed to adequately disclose its conflicts of interests in connection with the outside business activities and related compensation arrangements of an Investment Adviser Representative with an affiliated fund; failed to adopt and implement policies and procedures reasonably designed to prevent violations of the Advisers Act concerning reviews of client accounts and conflicts of interest; and failed to deliver required information concerning advisory personnel to its clients. The SEC ordered the Respondent to pay $83,462.00 in disgorgement, $11,874.00 in prejudgment interest, and a $393,381.00 civil money penalty, for a total of $488,717.00, to the SEC according to a payment plan described in the Order. The SEC also created a Fair Fund, pursuant to Section 308(a) of the Sarbanes-Oxley Act of 2002, so the penalty collected, along with the disgorgement and prejudgment interest collected, can be distributed to harmed investors (the "Fair Fund"). The Fair Fund consists of the $495,087.68 collected from the Respondent.

III. ELIGIBILITY CRITERIA

To be eligible for a payment from the Pinnacle Fair Fund, you must satisfy certain eligibility criteria that are described in detail in the Plan. The Plan is available on the Pinnacle Fair Fund website at www.PinnacleFairFund.com and the SEC's website at https://www.sec.gov/enforcement-litigation/distributions-harmed-investors/matter-pinnacle-investments-llc-admin-proc-file-no-3-21405. You may also request a copy of the Plan from the Fund Administrator by email at info@PinnacleFairFund.com or by calling 833-360-6854. The eligibility criteria include the following:

1. **You must have paid management advisory fees to the Respondent during the Relevant Period.**
2. **Your Recognized Loss calculates to a distribution amount equal to or greater than the Minimum Distribution Amount of $20.00, as calculated under the Plan**.
3. **You submit a signed, valid Certification Form by the Certification Deadline of October 17, 2025.**
4. **You are not an Excluded Party, defined in the Plan as:**
   a. The Respondent (Pinnacle Investments, LLC);
   b. Any present or former officers of the Respondent or any assigns, creditors, heirs, distributees, spouses, parents, dependent children or controlled entities of any of the foregoing Persons or entities;
   c. Any employee or former employee of the Respondent or any of its affiliates who has been terminated for cause or has otherwise resigned, in connection with the conduct described in the Order;
   d. Any Person who, as of the Certification Date, has been the subject of criminal charges related to the conduct described in the Order or any related SEC action;
   e. The Fund Administrator, their employees, and those Persons assisting the Fund Administrator in their role as the Fund Administrator; and,
   f. Any purchaser or assignee of another Person's right to obtain recovery from the Fair Fund for value; provided, however, that this provision shall not be construed to exclude those Persons who obtained such a right by gift, inheritance or devise.

IV. PLAN OF ALLOCATION

The Plan of Allocation, available for review as Exhibit A of the Plan, states how the Recognized Losses and Distribution Payments will be calculated.

The Plan of Allocation is designed to compensate investors for management advisory fees paid to the Respondent during a four-year period, from January 1, 2015 through December 31, 2018 (the "Relevant Period"), when the Respondent failed to conduct adequate periodic reviews for certain client advisory accounts to determine whether they were being managed in accordance with their investment mandates as described in the Order. An investor who did not suffer a loss by paying management advisory fees during the Relevant Period, or who is an Excluded Party, is ineligible to recover under the Plan. An Eligible Claimant is a Person who suffered a Recognized Loss as calculated by the Plan of Allocation; who submits a valid Certification Form by the Certification Form Deadline; and who is not an Excluded Party under paragraphs14(a)-(f) of the Plan. An Eligible Claimant will be deemed a Payee and will receive a distribution payment if their Recognized Loss calculates to a distribution amount equal to or greater than $20.00.

V. THE CERTIFICATION PROCESS

THE DEADLINE TO SUBMIT A CERTIFICATION FORM IS OCTOBER 17, 2025.

ONLINE SUBMISSIONS: Online submissions are encouraged. To submit a Certification Form online, please visit the Pinnacle Fair Fund website at www.PinnacleFairFund.com and follow the instructions provided. **Certification Forms completed online must be submitted on or before 11:59 p.m. Eastern Standard Time on October 17, 2025.**

MAIL SUBMISSIONS: If you are unable to submit a Certification Form online, you may request a copy of the paper Certification Form from the Fund Administrator by email at info@PinnacleFairFund.com or by calling 833-360-6854. **Certification Forms submitted by mail must be sent to the address provided on the Certification Form and postmarked (or if not sent by U.S. Mail, received) by October 17, 2025.**

If the Fund Administrator is unable to verify the address of a Preliminary Claimant and/or a Preliminary Claimant does not timely respond to the Fund Administrator's attempts to obtain information, including any information sought in the Plan Notice, the Preliminary Claimant may be deemed an Unresponsive Preliminary Claimant. Unresponsive Preliminary Claimants will not be eligible for distribution under the Plan.

VI. ADDITIONAL INFORMATION

The Certification Form provides your Recognized Loss, calculated in accordance with the Plan of Allocation. You can also view your Recognized Loss by logging into your account on the Submit a Certification Form page of the website: www.PinnacleFairFund.com using the User ID and PIN provided in your Certification Form.

Additional information regarding Pinnacle Fair Fund, including copies of the Plan, this Plan Notice, and other relevant documents may be found at www.PinnacleFairFund.com. You may request a copy of the Plan, this Plan Notice, the Certification Form, or seek additional information by contacting the Fund Administrator by email at info@PinnacleFairFund.com, or by calling 833-360-6854.

PLEASE CHECK THE WEBSITE WWW.PINNACLEFAIRFUND.COM FREQUENTLY FOR UPDATES.