

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 90006 / September 25, 2020**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-19511**

**In the Matter of**

**Leonardo Cornide and  
Jorge Falcon,**

**Respondents.**

**ORDER DIRECTING FOURTH  
PAYMENT OF CERTAIN FUNDS  
RECEIVED BY THE COMMISSION**

On January 24, 2020, the Commission issued an Amended Order Instituting Cease-and- Desist Proceedings Pursuant to Section 203(k) of the Investment Advisers Act of 1940, Making Findings, and Imposing a Cease-and-Desist Order (the “Amended Order”)<sup>1</sup> that amended the order issued on September 25, 2019,<sup>2</sup> which simultaneously instituted and settled a cease-and- desist proceeding against Leonardo Cornide (“Cornide”) and Jorge Falcon (“Falcon”) (together “Respondents”). These proceedings arise out of Respondents’ failure to disclose conflicts of interest while acting as investment advisers to Premier Assurance Group, SPC Ltd. (“PSPC”), a Cayman Islands-registered insurance company.

The Commission ordered Cornide to pay disgorgement of \$2,786,925 plus accrued interest of \$274,107.19, of which \$655,350 was previously paid to PSPC; and Falcon to pay disgorgement of \$4,390,278 plus accrued interest of \$414,630.27, of which \$920,349.82 was previously paid to PSPC. The remaining disgorgement and accrued interest was ordered to be paid in four installments, with such payments to be completed within 360 days of the entry of the Order. The Commission also ordered the Respondents to each pay a \$100,000 civil money penalty to the Commission, and created a Fair Fund, pursuant to Section 308(a) of the Sarbanes- Oxley Act of 2002, so the penalties could be included with the disgorgement and accrued interest to be collected for distribution (the “Fair Fund”).

<sup>1</sup> See Advisers Act Rel. No. 5366A (Jan. 24, 2020).

<sup>2</sup> Order Instituting Cease-and-Desist Proceedings Pursuant to Section 203(k) of the Investment Advisers Act of 1940, Making Findings, and Imposing a Cease-and-Desist Order, Advisers Act Rel. No. 5366 (Sept. 25, 2019).

On February 7, 2020, the Commission directed the first payment received from the Respondents, pursuant to the payment plan detailed in the Amended Order, in the amount of \$800,000 for a first tranche payment to PSPC.<sup>3</sup>

On April 30, 2020, the Secretary, pursuant to delegated authority, issued an order directing the second payment of certain funds received by the Commission to be paid from the Fair Fund to PSPC.<sup>4</sup>

On July 23, 2020, the Secretary, pursuant to delegated authority, issued an order directing the third payment of certain funds received by the Commission to be paid from the Fair Fund to PSPC.<sup>5</sup>

The Secretary has been granted authority to issue future orders directing payment of certain funds received by the Commission, upon the Commission's receipt of any additional funds paid pursuant to the payment plan detailed in the Amended Order.

The Commission is in receipt of the fourth payments as detailed in the Amended Order.

Accordingly, it is hereby **ORDERED** that the Commission staff shall direct the fourth payment of the \$2,900,000 from the Fair Fund to PSPC.

For the Commission, by its Secretary, pursuant to delegated authority.

Vanessa A. Countryman  
Secretary

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<sup>3</sup> Exchange Act Rel. No. 88144 (Feb. 7, 2020).

<sup>4</sup> Exchange Act Rel. No. 88777 (Apr. 30, 2020).

<sup>5</sup> Exchange Act Rel. No. 89390 (July 23, 2020).