UNITED STATES OF AMERICA before the SECURITIES AND EXCHANGE COMMISSION

SECURITIES ACT OF 1933 Release No. 10946 / June 14, 2021

SECURITIES EXCHANGE ACT OF 1934 Release No. 92165 / June 14, 2021

INVESTMENT ADVISERS ACT OF 1940 Release No. 5751 / June 14, 2021

INVESTMENT COMPANY ACT OF 1940 Release No. 34299 / June 14, 20215

Admin. Proc. File No. 3-14404

In the Matter of

ANDREW W. LIMPERT

ORDER VACATING MUNICIPAL SECURITIES DEALER, MUNICIPAL ADVISOR, TRANSFER AGENT, AND NATIONALLY RECOGNIZED STATISTICAL RATING ORGANIZATION BARS

Andrew W. Limpert seeks to vacate an order, dated July 11, 2012 (the "Order"), to the extent that it bars him from association with a municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization. The bars at issue were imposed based solely on conduct occurring prior to July 22, 2010, the effective date of the Dodd-Frank Wall Street Reform and Consumer Protection Act. Accordingly, in our discretion, we vacate the Order to the extent it prohibits Andrew W. Limpert from associating with a municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization, but otherwise leave the Order unmodified.

By the Commission.

Vanessa A. Countryman Secretary

See Andrew W. Limpert, Securities Act Release No. 9335, 2012 WL 2836956 (July 11, 2012).

² See Bartko v. SEC, 845 F.3d 1217, 1225 (D.C. Cir. 2017); Commission Statement Regarding Decision in Bartko v. SEC (Feb. 23, 2017), available at https://www.sec.gov/news/statement/commission-statement-regarding-bartko-v-sec.html.