

UNITED STATES OF AMERICA
before the
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT ADVISERS ACT OF 1940
Release No. 3613 / May 30, 2013

ADMINISTRATIVE PROCEEDING
File No. 3-15342

<p>In the Matter of</p> <p style="text-align:center">JOHN ALEXANDER GRANT,</p> <p>Respondent.</p>
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**ORDER INSTITUTING
ADMINISTRATIVE PROCEEDINGS
PURSUANT TO SECTION 203(f) OF THE
INVESTMENT ADVISERS ACT OF 1940,
MAKING FINDINGS, AND IMPOSING
REMEDIAL SANCTIONS**

I.

The Securities and Exchange Commission (“Commission”) deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted against John A. Grant (“Respondent”) pursuant to Section 203(f) of the Investment Advisers Act of 1940 (“Advisers Act”).

II.

In anticipation of the institution of these proceedings, Respondent has submitted an Offer of Settlement (the “Offer”) which the Commission has determined to accept. Solely for the purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, and without admitting or denying the findings herein, except as to the Commission’s jurisdiction over him and the subject matter of these proceedings and the findings contained in Section III.2 below, which are admitted, Respondent consents to the entry of this Order Instituting Administrative Proceedings Pursuant to Section 203(f) of the Investment Advisers Act of 1940 as set forth below.

III.

On the basis of this Order and Respondent’s Offer, the Commission finds that:

1. John A. (“Jack”) Grant, age 70, is a resident of Yarmouth Port, Massachusetts. He is and has been an attorney licensed to practice in the Commonwealth of Massachusetts.

2. On May 20, 2013, a final judgment was entered by consent against Jack Grant, permanently enjoining him from future violations of Sections 206(1) and 206(2) of the Advisers Act, in the civil action entitled Securities and Exchange Commission v. John A. Grant, et al., Civil Action Number 1:11-CV-11583, in the United States District Court for Massachusetts. Jack Grant was also ordered to pay \$50,000 in disgorgement plus prejudgment interest of \$1,392.27, and a \$150,000 civil penalty.

3. The Commission’s complaint, filed on September 1, 2011, alleged that in 1988, the Commission obtained a permanent injunction against Jack Grant based on his sale of unregistered securities and misappropriation of investor funds. The Commission then issued an order barring Jack Grant from associating with a broker-dealer, investment adviser, investment company, or municipal securities dealer. It further alleged that since at least the mid-1990s, Jack Grant violated the Commission’s bar order by providing investment advice for compensation, including advising clients to place their assets with First Wilshire Securities Management, Inc., and advising them to place their investment using his son Lee Grant, who worked first at First Wilshire itself, then at Wedbush Morgan Securities, and, since 2005, as the founder and sole owner of Sage Advisory Group LLC (“Sage”). Jack Grant is alleged to have continued to provide investment advice for compensation through 2011, advising individuals and small businesses on the management of their assets and investments, and associating with Sage, his son’s investment advisory firm. The complaint alleges that Jack Grant, Lee Grant, and Sage did not disclose to Sage’s advisory clients that Jack Grant is barred from associating with an investment adviser. In addition, Lee Grant and Sage are alleged not to have disclosed Jack Grant’s disciplinary history in Sage’s application for investment adviser registration on Form ADV.

IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanction agreed to in Respondent’s Offer.

Accordingly, it is hereby ORDERED pursuant to Section 203(f) of the Advisers Act that John A. Grant be, and hereby is, barred from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization.

Any reapplication for association by the Respondent will be subject to the applicable laws and regulations governing the reentry process, and reentry may be conditioned upon a number of factors, including, but not limited to, the satisfaction of any or all of the following: (a) any disgorgement ordered against the Respondent, whether or not the Commission has fully or partially waived payment of such disgorgement; (b) any arbitration award related to the conduct that served as the basis for the Commission order; (c) any self-regulatory organization arbitration award to a

customer, whether or not related to the conduct that served as the basis for the Commission order;
and (d) any restitution order by a self-regulatory organization, whether or not related to the conduct
that served as the basis for the Commission order.

By the Commission.

Elizabeth M. Murphy
Secretary