UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT ADVISERS ACT OF 1940
Release No. 5270 / July 2, 2019

INVESTMENT COMPANY ACT OF 1940
Release No. 33540 / July 2, 2019

ADMINISTRATIVE PROCEEDING
File No. 3-19235

In the Matter of **THE PARRISH GROUP, LLC and DARYL M. DAVIS,** **Respondents.**	**ORDER INSTITUTING ADMINISTRATIVE AND CEASE-AND-DESIST PROCEEDINGS PURSUANT TO SECTIONS 203(e), 203(f), AND 203(k) OF THE INVESTMENT ADVISERS ACT OF 1940 AND SECTION 9(b) OF THE INVESTMENT COMPANY ACT OF 1940, MAKING FINDINGS, AND IMPOSING REMEDIAL SANCTIONS AND A CEASE-AND-DESIST ORDER**

I.

The Securities and Exchange Commission ("Commission") deems it appropriate and in the public interest that public administrative and cease-and-desist proceedings be, and hereby are, instituted pursuant to Sections 203(e) and 203(k) of the Investment Advisers Act of 1940 ("Advisers Act") against The Parrish Group, LLC ("Parrish Group"), and Sections 203(f) and 203(k) of the Advisers Act and Section 9(b) of the Investment Company Act of 1940 ("Investment Company Act") and Daryl M. Davis ("Davis") (collectively "Respondents").

II.

In anticipation of the institution of these proceedings, Respondents have submitted Offers of Settlement (the "Offers") 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 them and the subject matter of these proceedings, which are admitted, and except as provided herein in Section V, Respondents consent to the entry of this Order Instituting Administrative and Cease-and-Desist Proceedings Pursuant to Sections 203(e), 203(f), and 203(k) of the Investment Advisers Act of 1940 and Section 9(b) of the

Investment Company Act of 1940, Making Findings, and Imposing Remedial Sanctions and a Cease-and-Desist Order ("Order"), as set forth below.

III.

On the basis of this Order and Respondents' Offers, the Commission finds that:

Summary

This matter concerns material misrepresentations by Parrish Group, an investment adviser, and Davis, Parrish Group's founder, sole owner, and sole manager, regarding Parrish Group's investment advisory business. Specifically, Parrish Group and Davis repeatedly misled prospective clients about, among other things, Parrish Group's assets under management, its clients, the number and identity of its employees, and its registration status with the SEC. Through their conduct, Parrish Group and Davis violated Sections 206(1) and 206(2) of the Advisers Act.

Respondents

1. **The Parrish Group, LLC**, a Virginia limited liability company headquartered in the District of Columbia, was registered as an investment adviser with the Commission from June 14, 2007 until it filed Form ADV-W on February 20, 2008. Thereafter, Parrish Group continued operating as an unregistered investment adviser. Davis is Parrish Group's founder and has always been its sole owner and manager.

2. **Daryl M. Davis**, age 40 and a current resident of Buford, Georgia, and former resident of the District of Columbia, is the founder, sole owner, and sole manager of Parrish Group. He held a FINRA Series 6 license at a previous employer until July 2003 and does not currently hold any active securities licenses.

Facts

A. Background

3. Davis formed Parrish Group in 2007 to provide financial services, including investment advisory services, to individual and institutional clients. Davis operated Parrish Group consistent with this business plan through at least June 2018. At all times, Parrish Group and Davis charged clients fees for the services they provided, including investment advisory services.

B. False Disclosures To Prospective Investment Advisory Clients

4. From at least July 2016 to November 2017, Parrish Group and Davis used a brochure (the "Firm Overview") to advertise Parrish Group's investment advisory services to prospective clients, including athletes starting their professional careers and their parents. Davis drafted the Firm Overview and was responsible for its content. Davis or a Parrish Group

representative acting at his direction emailed the Firm Overview to prospective clients at least 80 times during this period.

5. The Firm Overview contained multiple material misrepresentations. For example, the Firm Overview claimed Parrish Group managed over $1 billion in assets; in fact, the firm never managed any significant assets. Similarly, the Firm Overview represented that Parrish Group had 14 employees; in fact, the firm never had more than one other employee besides Davis.

6. In addition, the Firm Overview identified certain prominent individuals and entities as Parrish Group's purported clients, including a specific prominent business executive, professional athlete, pension fund, and employee health system. In reality, none of these individuals or entities was ever a Parrish Group client.

7. The Firm Overview further falsely named three individuals as the firm's: (1) Executive Vice President and Director of Finance and Tax, (2) Executive Vice President, General Counsel, and Director of Corporate Finance & Investment Banking, and (3) Executive Vice President, Investment Strategist, and Portfolio Manager. None of these individuals held these purported positions or any other position at Parrish Group.

8. On multiple occasions, Davis sent a cover email transmitting the Firm Overview that falsely represented that Parrish Group managed $1.4 billion in assets and that the prominent business executive and professional athlete referenced in paragraph 6 above were Parrish Group clients.

9. In January 2018, a professional athlete, who was receiving non-advisory services from Parrish Group, responded to Davis's recommendation that he open an investment advisory account by asking Davis, among other things, what registrations Parrish Group held. Davis falsely responded that Parrish Group was registered with the Commission as an investment adviser. In fact, Parrish Group had not been registered with the Commission since February 2008.

Violations

10. As a result of the conduct described above, Parrish Group and Davis willfully violated Section 206(1) of the Advisers Act, which prohibits an investment adviser from employing any device, scheme, or artifice to defraud any client or prospective client.

11. By virtue of the same conduct, Parrish Group and Davis willfully violated Section 206(2) of the Advisers Act, which prohibits an adviser from engaging in any transaction, practice, or course of business which operates as a fraud or deceit upon any client or prospective client.

IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest, to impose the sanctions agreed to in Respondents' Offers.

Accordingly, pursuant to Sections 203(e), 203(f), and 203(k) of the Advisers Act and Section 9(b) of the Investment Company Act, it is hereby ORDERED that:

A. Parrish Group and Davis cease and desist from committing or causing any violations and any future violations of Sections 206(1) and 206(2) of the Advisers Act.

B. Parrish Group is censured.

C. Davis be, and hereby is:

barred from association with any investment adviser, broker, dealer, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization; and

prohibited from serving or acting as an employee, officer, director, member of an advisory board, investment adviser or depositor of, or principal underwriter for, a registered investment company or affiliated person of such investment adviser, depositor, or principal underwriter.

Any reapplication for association by Davis 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 Davis, 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.

D. Respondents, jointly and severally, shall, within 10 days of the entry of this Order, pay a civil money penalty in the amount of $184,767 to the Securities and Exchange Commission for transfer to the general fund of the United States Treasury, subject to Exchange Act Section 21F(g)(3). If timely payment is not made, additional interest shall accrue pursuant to 31 U.S.C. § 3717.

Payment must be made in one of the following ways:

(1) Respondents may transmit payment electronically to the Commission, which will provide detailed ACH transfer/Fedwire instructions upon request;

(2) Respondents may make direct payment from a bank account via Pay.gov through the SEC website at http://www.sec.gov/about/offices/ofm.htm; or

(3) Respondents may pay by certified check, bank cashier's check, or United States postal money order, made payable to the Securities and Exchange Commission and hand-delivered or mailed to:

Enterprise Services Center
Accounts Receivable Branch
HQ Bldg., Room 181, AMZ-341
6500 South MacArthur Boulevard
Oklahoma City, OK 73169

Payments by check or money order must be accompanied by a cover letter identifying Parrish Group and Davis as Respondents in these proceedings, and the file number of these proceedings; a copy of the cover letter and check or money order must be sent to Adam S. Aderton, Co-Chief, Asset Management Unit, Division of Enforcement, Securities and Exchange Commission, 100 F St., NE, Washington, DC 20549-5012.

E. Amounts ordered to be paid as civil money penalties pursuant to this Order shall be treated as penalties paid to the government for all purposes, including all tax purposes. To preserve the deterrent effect of the civil penalty, Respondents agree that in any Related Investor Action, they shall not argue that they are entitled to, nor shall they benefit by, offset or reduction of any award of compensatory damages by the amount of any part of Parrish Group or Davis's payment of a civil penalty in this action ("Penalty Offset"). If the court in any Related Investor Action grants such a Penalty Offset, Respondents agree that they shall, within 30 days after entry of a final order granting the Penalty Offset, notify the Commission's counsel in this action and pay the amount of the Penalty Offset to the Securities and Exchange Commission. Such a payment shall not be deemed an additional civil penalty and shall not be deemed to change the amount of the civil penalty imposed in this proceeding. For purposes of this paragraph, a "Related Investor Action" means a private damages action brought against Parrish Group and/or Davis by or on behalf of one or more investors based on substantially the same facts as alleged in the Order instituted by the Commission in this proceeding.

V.

It is further Ordered that, solely for purposes of exceptions to discharge set forth in Section 523 of the Bankruptcy Code, 11 U.S.C. § 523, the findings in this Order are true and admitted by Davis, and further, any debt for disgorgement, prejudgment interest, civil penalty or other amounts due by Davis under this Order or any other judgment, order, consent order, decree or settlement agreement entered in connection with this proceeding, is a debt for the violation by Davis of the federal securities laws or any regulation or order issued under such laws, as set forth in Section 523(a)(19) of the Bankruptcy Code, 11 U.S.C. § 523(a)(19).

By the Commission.

Vanessa A. Countryman
Secretary