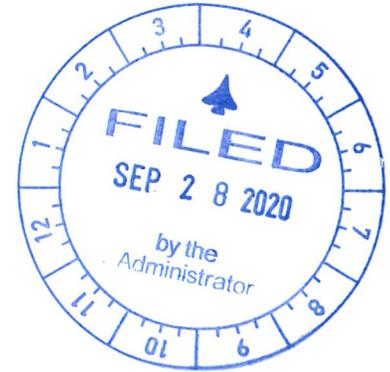


STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:

Pentecost Capital Management, Inc. (CRD #106078) and
C. Daniel Pentecost (CRD #1066678),

Respondents.

ODS File 20-019

**ORDER DENYING MOTION TO DISMISS SUMMARY ORDER SUSPENDING
REGISTRATIONS AND EXTENDING SUMMARY ORDER SUSPENDING
REGISTRATIONS UNTIL FINAL DETERMINATION**

The Administrator of the Oklahoma Department of Securities (the “Administrator” and the “Department”) issues this Order under Section 1-411 of the Oklahoma Uniform Securities Act of 2004 (the “Act”), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011 and Supp. 2019), and 660:2-9-2 of the Rules of the Oklahoma Securities Commission and the Administrator of the Oklahoma Department of Securities (the “Rules”), Okla. Admin. Code §§ 660:1-1-1 through 660:25-7-1.

On August 3, 2020, the Enforcement Division of the Department initiated an administrative proceeding against Pentecost Capital Management, Inc., and C. Daniel Pentecost (collectively, the “Respondents”) by filing an Enforcement Division Recommendation (the “Recommendation”) with the Administrator in support of the issuance of an order revoking the Respondents’ registrations under the Act for alleged violations of the Act and Rules as set forth in the Recommendation. The Recommendation alleged insolvency of the Respondents and their engagement in unethical practices in the securities business. On the same day, based on the Recommendation, the Administrator issued an order summarily suspending the Respondents’ registrations pending a final determination of the administrative proceeding (the “Summary Order”).

On August 21, 2020, Respondents filed answers to the Recommendation and Summary Order, including motions to dismiss, and requested hearings on the Recommendation and the Summary Order.

On September 3, 2020, the Administrator issued an order setting a hearing on the Summary Order to commence at 10:00 a.m. on September 18, 2020, in the offices of the Oklahoma Department of Securities located at 204 North Robinson Avenue, Suite 400, Oklahoma City, Oklahoma. The Administrator also ordered that a hearing officer, if appointed, make a

recommendation to the Administrator to modify or vacate the Summary Order or extend the Summary Order until final determination.

On September 3, 2020, the Administrator further ordered that a hearing on the matters set forth in the Recommendation commence at 10:00 a.m. on November 18, 2020, in the offices of the Oklahoma Department of Securities located at 204 North Robinson Avenue, Suite 400, Oklahoma City, Oklahoma. The Administrator also ordered that a hearing officer, if appointed, prepare a proposed order for submission to the Administrator when deemed appropriate under the circumstances.

On September 14, 2020, the Administrator issued an order, effective August 29, 2020, appointing Danné Johnson as the Hearing Officer to conduct the individual proceeding or proceedings in this matter, and delegating to her the authority to do all things necessary and appropriate to discharge the duties of Hearing Officer as set forth in 660:2-9-2(f) of the Rules.

A hearing on the Summary Order was held on September 18, 2020, before the appointed Hearing Officer. On September 28, 2020, the Hearing Officer filed her report and recommendations with the Administrator, a copy of which is attached hereto as Exhibit "A".

The Hearing Officer found that Respondents did not present information in their Answer to the Summary Order or present evidence during the hearing to refute the findings of fact and conclusions of law relating to the Respondents' insolvency and unethical practices set forth in the Recommendation and incorporated by reference in the Summary Order. The Hearing Officer, finding the issuance of the Summary Order to be within the Administrator's statutory authority, further found it to be in the public interest that the Respondents' registrations continue to be suspended until the final determination of the administrative proceeding.

The Hearing Officer recommended that Respondents' motion to dismiss the Summary Order be denied and that the suspensions of registration be extended until the final determination of the administrative proceeding.

THEREFORE, IT IS HEREBY ORDERED that the Respondents' motion to dismiss the Summary Order Suspending Registrations be denied and that the Summary Order Suspending Registrations continue in effect until final determination of the administrative proceeding, for which a hearing is scheduled to commence on November 18, 2020, at 10:00 a.m.

28th Witness my Hand and the Official Seal of the Oklahoma Department of Securities this day of September, 2020.

(SEAL)



MELANIE HALL, ADMINISTRATOR
OKLAHOMA DEPARTMENT OF SECURITIES

CERTIFICATE OF MAILING

The undersigned hereby certifies that on the 28th day of September, 2020, a true and correct copy of the above and foregoing *Order Denying Motion to Dismiss Summary Order Suspending Registrations and Extending Summary Order Suspending Registrations until Final Determination* was sent by First Class mail and email to:

By email only:

Terra Bonnell
tbonnell@securities.ok.gov

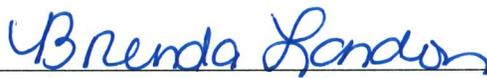
Amanda Cornmesser
acornmesser@securities.ok.gov

Counsel for the Oklahoma Department of Securities

By First Class mail and email to:

Gerald J. Lovoi
Attorney at Law
616 South Boston #403
Tulsa, OK 74119
glovoi@aol.com

Counsel for Respondents


Brenda London
Brenda London, Paralegal