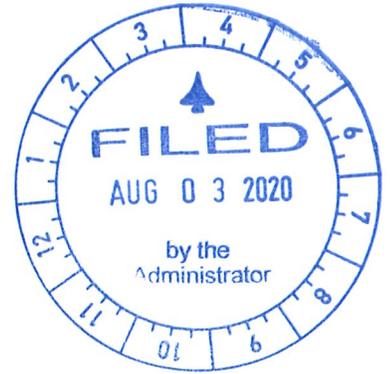


STATE OF OKLAHOMA  
DEPARTMENT OF SECURITIES  
204 NORTH ROBINSON, SUITE 400  
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:

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

Respondents.

ODS File 20-019

**SUMMARY ORDER SUSPENDING REGISTRATIONS**

The Administrator of the Oklahoma Department of Securities (“**Administrator**” and “**Department**”) issues this Order pursuant to Section 1-411 of the Oklahoma Uniform Securities Act of 2004 (“**Act**”), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011 and Supp. 2019). The Administrator hereby adopts the Findings of Fact and Conclusions of Law set forth below.

**Findings of Fact**

1. Pentecost Capital Management, Inc. (“**PCM**”) is an Oklahoma corporation that has been registered under Oklahoma’s securities laws as an investment adviser during the time periods April 2003 to December 2003, and February 2007 to the present. PCM was registered under federal law as an investment adviser during the time periods February 1997 to July 2003, and December 2003 to March 2007.

2. C. Daniel Pentecost (“**Pentecost**”) is a registered investment adviser representative of PCM under Oklahoma’s securities laws and has been since March 1997. At all times material hereto, Pentecost has been the president, sole owner, and sole investment adviser representative of PCM.

3. On August 3, 2020, the Department commenced an administrative proceeding against PCM and Pentecost by filing an Enforcement Division Recommendation (“**Recommendation**”) with the Administrator. In the pending proceeding, the Department seeks to revoke Respondents’ registrations under the Act based on insolvency and unethical practices in the securities business as described in the Recommendation and incorporated herein by reference.

To the extent any of these Findings of Fact are more properly characterized as Conclusions of Law, they should be so considered.

## Authority

Section 1-411 of the Act provides, in pertinent part:

F. The Administrator may summarily postpone an application or summarily suspend a registration before final determination of an administrative proceeding. Upon the issuance of the order, the Administrator shall promptly notify each person subject to the order that the order has been issued, the reasons for the action, and that within fifteen (15) days after the receipt of a request in a record from the person the matter will be scheduled for a hearing and such hearing shall be commenced within fifteen (15) days of the matter being set for hearing. If a hearing is not requested and none is ordered by the Administrator, within thirty (30) days after the date of service of the order, the order becomes final by operation of law. If a hearing is requested or ordered, the Administrator, after notice of and opportunity for hearing to each person subject to the order, may modify or vacate the order or extend the order until final determination.

## Conclusions of Law

1. The Administrator is authorized under Section 1-411(F) of the Act to summarily suspend Respondents' registrations under the Act pending a final determination of the administrative proceeding.

2. It is in the public interest for the Administrator to summarily suspend Respondents' registrations under the Act pending a final determination of the administrative proceeding.

To the extent any of these Conclusions of Law are more properly characterized as Findings of Fact, they should be so considered.

**NOW THEREFORE, IT IS HEREBY ORDERED** that Respondents' registrations under the Act are summarily suspended.

Witness my Hand and the Official Seal of the Oklahoma Department of Securities this 3<sup>rd</sup> day of August, 2020.

(SEAL)

  
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MELANIE HALL, ADMINISTRATOR OF THE  
OKLAHOMA DEPARTMENT OF SECURITIES

**NOTICE OF OPPORTUNITY FOR HEARING**

Pursuant to Section 1-411 of the Act, the Administrator hereby gives notice to Respondents of their right to request a hearing. The request for hearing must be received by the Administrator within thirty (30) days after service of this Order. The request for hearing must be in writing.

Within fifteen (15) days after receipt of a request for hearing from Respondents, this matter will be scheduled for hearing. The hearing shall commence within fifteen (15) days of the matter being set for hearing. Notice of the date, time and location of the hearing shall be given to Respondents. If a hearing is requested, the Administrator, after notice and opportunity for hearing to Respondents, may modify or vacate this Order or extend it until final determination.

If Respondents do not request a hearing within thirty (30) days after the date of service of this Order and none is ordered by the Administrator, the Order becomes final as to Respondents by operation of law.

Witness my Hand and the Official Seal of the Oklahoma Department of Securities this 3<sup>rd</sup> day of August, 2020.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 3<sup>rd</sup> day of August, 2020, a true and correct copy of the above and foregoing Order was sent by certified mail, return receipt requested, delivery restricted, to:

C. Daniel Pentecost  
4630 S. Columbia Ave.  
Tulsa, OK 74105

Pentecost Capital Management, Inc.  
1909 West C Street  
Jenks, OK 74037

  
Brenda London, Paralegal