

TRAVIS J. ILES
SECURITIES COMMISSIONER



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MEMBER

IN THE MATTER OF THE INVESTMENT §
ADVISER REGISTRATION OF §
THE PILOT'S ADVISOR, LLC §

Order No. REG-24-CAF-09

TO: The Pilot's Advisor, LLC (CRD No. 160241)
940 Falling Waters Lane
Seneca, SC 29672

DISCIPLINARY ORDER

Be it remembered that The Pilot's Advisor, LLC ("Respondent") appeared before the Securities Commissioner of the State of Texas ("Securities Commissioner") and consented to the entry of this order ("Order") and the Findings of Fact and Conclusions of Law contained herein.

FINDINGS OF FACT

1. Respondent has waived (a) Respondent's right to notice and hearing in this matter; (b) Respondent's right to appear and present evidence in this matter; (c) Respondent's right to appeal this Order; and (d) all other procedural rights granted to the Respondent by The Securities Act, Tex. Gov't Code §§ 4001.001-4008.105 ("Texas Securities Act"), and the Administrative Procedure Act, Tex. Gov't Code Ann. §§ 2001.001-2001.903.
2. On May 6, 2024, Respondent applied for registration with the Securities Commissioner as an investment adviser, as required by Section 4004.052 of the Texas Securities Act. This application is currently pending.
3. Pursuant to Section §116.1(b)(2)(A)(iv) of the Rules and Regulations of the Texas State Securities Board (the "Board Rules"), which exempts from the registration requirements of the Texas Securities Act an investment adviser who does not have a place of business located in Texas and during the preceding twelve-month period, has had five (5) or fewer clients who are Texas residents, Respondent notice filed with the Securities Commissioner on September 28, 2017.

4. However, beginning in or around October 2020, Respondent acquired more than five (5) clients who are Texas residents.

CONCLUSIONS OF LAW

1. From September 2017 through May 2024, Respondent acted as an “investment adviser” in Texas as the term “investment adviser” is defined by Section 4001.059 of the Texas Securities Act.
2. From October 2020 through May 2024, Respondent violated Section 4004.052 of the Texas Securities Act by rendering services as an investment adviser in Texas at a time when Respondent was not registered with the Securities Commissioner as an investment adviser.
3. Pursuant to Section 4007.105(a)(13)(A) of the Texas Securities Act, the aforementioned violation of Section 4004.052 of the Texas Securities Act constitutes a basis for the issuance of an Order reprimanding Respondent.
4. Pursuant to Section 4007.106(a)(3) of the Texas Securities Act, Respondent’s aforementioned violation of Section 4004.052 of the Texas Securities Act constitutes a basis for the assessment of an administrative fine against Respondent.

ORDER

1. It is therefore ORDERED that The Pilot’s Advisor, LLC’s application for registration as an investment adviser with the Securities Commissioner is hereby GRANTED.
2. It is further ORDERED that The Pilot’s Advisor, LLC is hereby REPRIMANDED.
3. It is further ORDERED that The Pilot’s Advisor, LLC shall pay an ADMINISTRATIVE FINE in the amount of eight thousand five hundred dollars (\$8,500.00). Payment shall be made by delivery of a cashier’s check to the Securities Commissioner in the amount of eight thousand five hundred dollars (\$8,500.00), payable to the State of Texas, contemporaneously with the delivery of this Order.

SIGNED AND ENTERED BY THE SECURITIES COMMISSIONER this 19th day of December, 2024.



TRAVIS J. ILES
Securities Commissioner

Respondent:

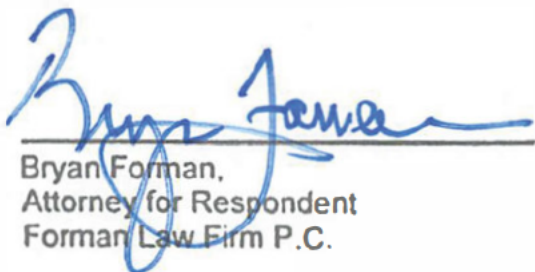
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The Pilot's Advisor, LLC
By: Ryan Fleming
Chief Compliance Officer

Approved as to Form:



Cristi Ramón Ochoa,
Deputy Securities Commissioner



Bryan Forman,
Attorney for Respondent
Forman Law Firm P.C.



Elliott Wolf,
Attorney
Legal and Investigations Division