

**STATE OF NEVADA**  
**OFFICE OF THE SECRETARY OF STATE**  
**SECURITIES DIVISION**  
2250 LAS VEGAS BOULEVARD NORTH, SUITE 400  
NORTH LAS VEGAS, NEVADA 89030

**In the Matter of:**

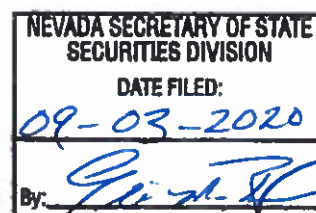
**CATAMOUNT STRATEGIC ADVISORS,  
LLC, CRD No. 150823; COBB HOSKINS  
SADLER, CRD No. 4225742**

**Respondents.**

**ADMINISTRATIVE CONSENT ORDER**

**File No. CIC19-081**

**TO: Catamount Strategic Advisors, LLC  
Cobb Hoskins Sadler  
1565 Pine Cone Circle  
Incline Village, NV 89451**



**WHEREAS** CATAMOUNT STRATEGIC ADVISORS, LLC (Catamount), CRD No. 150823, is a registered investment advisory firm located at 1565 Pine Cone Circle, Incline Village, NV 89147;

**WHEREAS**, Cobb Hoskins Sadler, CRD No. 4225742, is a Nevada registered investment advisor and the sole owner of Catamount. He resides and works at 1565 Pine Cone Circle, Incline Village, NV 89147;

**WHEREAS**, on June 5, 2019, Compliance/Audit Investigators with the Nevada Securities Division, Office of the Secretary of State (Division), pursuant to the Administrator's authority under NRS § 90.410, conducted an inspection of Respondents to verify compliance with Nevada's Uniform Securities Act (Act);

**WHEREAS**, pursuant to NAC § 90.380(2), an investment advisor is required to update its Form ADV within 30 days after the event that requires the filing of the amendment;

**WHEREAS**, the Division discovered during the aforementioned inspection that Respondent Sadler failed to file the required annual updating amendments to the Form ADV as required by NAC § 90.380(2);

**WHEREAS**, the Division discovered during the aforementioned inspection that Respondents have failed to maintain certain required financial records in violation of NAC § 90.387;

**WHEREAS**, the Division discovered that Respondents had not independently verified whether or not certain clients were considered qualified investors for purposes of fee assessment as required by both Nevada and the SEC, a violation of NAC § 90.387;

**WHEREAS**, Respondents have advised the Division of their desire to resolve the above failures to comply with the requirements of the Act, on the terms specified within this Administrative Consent Order;

**WHEREAS**, Respondents elect to permanently and expressly waive any right to a hearing and appeal under the Act and/or to seek judicial review under the Nevada Administrative Procedure Act, NRS Chapter 233B with respect to this Order.

**NOW THEREFORE**, the Administrator, pursuant to the Act, hereby enters the following:

**ORDER**

Finding the following appropriate and in the public interest, and on the basis of the foregoing, and Respondents' consent to the entry of this Order,

**IT IS HEREBY ORDERED:**

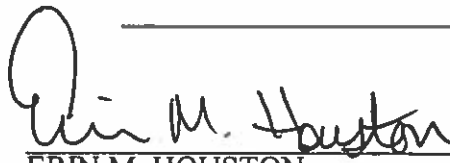
1. Respondents will cease from violating the Act and will comply with said Act.
2. Respondents will pay the Nevada Secretary of State a civil penalty in the cumulative amount of Ten Thousand Dollars and No Cents (\$10,000.00).
3. Respondents shall submit a check made payable to the Secretary of State in the amount of One Thousand Dollars and No Cents (\$1,000.00) for its fee for the inspection of Catamount's records performed under NRS § 90.410. This is due upon the signing of this Order.
4. All amounts submitted under this section shall be remitted to:  
  
Nevada Secretary of State  
c/o Stacey Roter  
2250 Las Vegas Boulevard North, Suite 400  
North Las Vegas, NV 89030
5. Respondents will, within five days of this agreement, file its annual updating amendments to the Form ADV (Parts 1 and 2). The Division notes that Respondents have updated its Form ADV in July 2020.
6. Respondents shall timely file all future annual updating amendments to the Form ADV (Parts 1 and 2) within ninety (90) days of its fiscal year end as mandated by NAC 90.380(3).
7. Respondents shall maintain adequate books and records as mandated by NAC § 90.387.

8. Respondents shall procure missing documentation for all client files. The Division notes that Respondents have provided the Division with such documentation.
9. Respondents shall hire an independent consultant or compliance person. The Division notes that Respondents have engaged an independent consultant in July 2020.
10. In consideration, the Division will take no further enforcement action based upon the circumstances covered by this inspection and this Order, and close its administrative investigation of Respondents in connection with the aforementioned activities.
11. Nothing in this Order shall be construed as a waiver of the Division's right to investigate and pursue any violations by Respondents in connection with other activity not set forth herein.
12. Nothing in this Order is intended to limit or create for third parties any private remedies against Respondents.
13. This Order shall be effective as of the date on which it is signed by the Administrator as set forth below.

Dated this 3<sup>rd</sup> day of September, 2020.

**BY ORDER OF THE ADMINISTRATOR**

Nevada Securities Division, Office of the Secretary of State

  
\_\_\_\_\_  
ERIN M. HOUSTON  
Deputy Secretary for Securities  
Securities Administrator

**CONSENT TO ENTRY OF ADMINISTRATIVE ORDER**


Catamount Strategic Advisors, LLC, by and through its authorized representative, Cobb Hoskins Sadler, and Cobb Hoskins Sadler individually (collectively, Respondents), hereby acknowledge that they have been served with a copy of this Administrative Consent Order (ACO), have read the foregoing ACO, are aware of their right to a hearing and appeal in this matter, and have waived the same.

Respondents admit the jurisdiction of the Securities Division of the Office of the Secretary of State, State of Nevada, and consent to entry of this ACO by the Administrator of the Division as settlement of the issues contained in this ACO.

Respondents aver that no promise of any kind or nature, other than the consideration set forth in the Order, has been made to Respondent to induce them to enter into this ACO and that they have entered into this ACO voluntarily.

Dated this 27th day of August, 2020.

CATAMOUNT STRATEGIC ADVISORS, LLC

By:   
Cobb Hoskins Sadler  
Authorized Representative, and in his individual capacity



Ragghianti|Freitas LLP

ATTORNEYS AT LAW

1101 FIFTH AVENUE, SUITE 100  
SAN RAFAEL, CA 94901-2903  
TELEPHONE 415.453.9433  
FACSIMILE 415.453.8269  
WWW.RFLAWLLP.COM

JACK G. MARTEL  
JMARTEL@RFLAWLLP.COM

September 2, 2020

VIA FEDERAL EXPRESS

Nevada Secretary of State  
c/o Stacey Roter  
2250 Las Vegas Boulevard North, Suite 400  
North Las Vegas, NV 89030

NEVADA  
SECRETARY OF STATE

SEP 03 2020

SECURITIES DIVISION  
\$1,000.00  
\$10,000.00

RE: Catamount Strategic Advisors, LLC, CRD No. 150823; Cobb Hoskins Sadler, CRD No. 4225742; File No. CIC19-081

Dear Ms. Roter:

Please find enclosed an original of the Administrative Consent Order in the above-referenced matter executed by Respondents. Also included are checks in the amount of \$1,000 and \$10,000, each made payable to the Nevada Secretary of State, for the inspection fee and civil penalty, respectively, as set forth in the Consent Order.

Please forward a copy of the Consent Order countersigned by the Administrator when available.

Very truly yours,

Jack G. Martel

cc: Brett Olin (via email only)  
Cobb Sadler (via email only)