

SECURITIES AND EXCHANGE COMMISSION
Washington, D.C.

INVESTMENT ADVISERS ACT OF 1940
Release No. 2595 / March 2, 2007

Admin. Proceeding File No. 3-12579

In the Matter of Kirk S. Wright

The United States Securities and Exchange Commission (“Commission”) announced the issuance of an Order Instituting Administrative Proceedings Pursuant To Section 203(f) of the Investment Advisers Act of 1940 and Notice of Hearing against Kirk S. Wright (“Wright”). In the Order, the Division of Enforcement alleges that on February 9, 2007, Wright was permanently enjoined from future violations of Sections 17(a) of the Securities Act of 1933 and Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5 thereunder and from future violations of Sections 206(1) and 206(2) of the Investment Advisers Act of 1940 (Advisers Act). The Order further alleges that according to the complaint in the underlying injunctive action, between February 1997 and February 2006, Wright, International Management Associates, LLC (IMA) and International Management Associates Advisory Group, LLC (IMA Advisory) raised as much as \$185 million from up to 500 investors by selling investments in seven hedge funds. The complaint also alleged that since at least 2003, IMA and IMA Advisory, through Wright, have been providing investors with quarterly statements that misrepresented the amount of assets in the respective funds and misrepresented the rates of return obtained by the respective funds. According to the complaint, without disclosure to investors, virtually all of the assets of the funds have been dissipated.

A hearing will be scheduled before an administrative law judge to determine whether the allegations contained in the Order are true, to provide Wright an opportunity to dispute these allegations, and to determine what, if any, remedial sanctions against Wright are appropriate and in the public interest pursuant to the Advisers Act.