

UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDINGS RULINGS  
Release No. 676/June 8, 2011

ADMINISTRATIVE PROCEEDING  
File No. 3-14082

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In the Matter of	:	
	:	ORDER DISCONTINUING
FREEDOMTREE MUTUAL FUNDS AND	:	PROCEEDING WITHOUT
ASSET MANAGEMENT, LLC, D/B/A	:	PREJUDICE
FREEDOMTREE ASSET MANAGEMENT, LLC,	:	
SPENCE-LINGO & COMPANY, LTD., D/B/A	:	
FREEDOMTREE TRANSFER AGENCY, and	:	
JERMAINE EZEKIEL SPENCE	:	

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The Securities and Exchange Commission issued an Order Instituting Proceedings (OIP) on September 30, 2010, pursuant to Sections 15(b), 17A and 21C of the Securities Exchange Act of 1934 (Exchange Act) and Sections 203(e), (f) and (k) of the Investment Advisers Act of 1940. The proceeding has ended as to FreedomTree Mutual Funds and Asset Management, LLC, d/b/a FreedomTree Assset Management, LLC and Spence-Lingo & Company, Ltd., d/b/a FreedomTree Transfer Agency. See FreedomTree Mutual Funds and Asset Management, LLC, d/b/a FreedomTree Asset Management, LLC, Exchange Act Release No. 64483 (May 13, 2011). On June 7, 2011, the Division of Enforcement (Division) filed a motion pursuant to 17 C.F.R. § 200.30-10(a)(8) requesting that the proceeding be discontinued without prejudice against Jermaine Ezekiel Spence (Spence) (Motion). The Division represents that it has been unable to serve Spence with the OIP despite diligent and substantial efforts to do so, such as engaging a process server who attempted to serve Spence at multiple addresses in both Atlanta and Philadelphia. The Division has no further information and no leads to pursue to accomplish service, nor does it believe it will be able to serve Spence in the near future.

**Ruling**

FOR GOOD CAUSE SHOWN, I GRANT the Division's Motion and discontinue the proceeding without prejudice, pursuant to 17 C.F.R. § 200.30-10(a)(8).

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Brenda P. Murray  
Chief Administrative Law Judge