

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**INVESTMENT ADVISERS ACT OF 1940**  
**Release No. 3871 / July 3, 2014**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-15963**

**In the Matter of**  
  
**THOMAS D. RENISON,**  
  
**Respondent.**

**ORDER INSTITUTING**  
**ADMINISTRATIVE PROCEEDINGS**  
**PURSUANT TO SECTION 203(f) OF THE**  
**INVESTMENT ADVISERS ACT OF 1940,**  
**MAKING FINDINGS, AND IMPOSING**  
**REMEDIAL SANCTIONS**

**I.**

The Securities and Exchange Commission (“Commission”) deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted pursuant to Section 203(f) of the Investment Advisers Act of 1940 (“Advisers Act”) against Thomas D. Renison (“Renison” or “Respondent”).

**II.**

In anticipation of the institution of these proceedings, Respondent has submitted an Offer of Settlement (the “Offer”) which the Commission has determined to accept. Solely for the purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, and without admitting or denying the findings herein, except as to the Commission’s jurisdiction over him and the subject matter of these proceedings and the findings contained in Section III.2 below, which are admitted, Respondent consents to entry of this Order Instituting Administrative Proceedings Pursuant to Section 203(f) of the Investment Advisers Act of 1940, Making Findings, and Imposing Remedial Sanctions (“Order”), as set forth below.

### III.

On the basis of this Order and Respondent's Offer, the Commission finds that:

1. Renison, age 60, is a resident of Glastonbury, Connecticut. From January 2009 to May 2010, Renison was associated with Equity Services, Inc., an entity registered with the Commission both as an investment adviser (File No. 801-41722) and a broker-dealer (File No.008-14286). From September 1993 through March 2008, Renison was an associated person of various other investment advisers registered with the Commission. Concurrently, Renison founded and operated an unregistered firm in Hartford, Connecticut, called Connecticut Financial Group, through which he advised clients on the investment of their retirement funds and sold annuities, variable annuities, and life insurance.

2. Renison consented to an order issued by the Securities Administrator of the State of Maine on October 22, 2012, *In re Thomas D. Renison*, No. COR-11-7846 (the "Maine Order"). The Maine Order permanently bars Renison from associating with any issuer, broker-dealer or investment adviser in Maine.

3. The Maine Order found that Renison committed at least five violations of the Maine Uniform Securities Act, including provisions that, among other things, prohibit fraudulent and deceptive conduct. Specifically, it found that, in May 2008, Renison sold an investment, which was a security, to a 77-year-old retired Maine resident (the "Client") for \$600,000. The Maine Order further found that, in selling the security, Renison used a prospectus that made untrue statements of material fact and failed to disclose all material facts necessary to avoid misleading the purchaser.

4. Renison received, and used for his own purposes, a total of \$105,000 of the funds invested by the Client.

5. Subsequent to the sale of the investment and continuing during a period of time when he was associated with a registered investment adviser, Renison made a series of lulling statements in response to requests by the Client that his invested funds be repaid in accordance with the agreed upon terms.

### IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanctions agreed to in Respondent Renison's Offer.

Accordingly, it is hereby ORDERED pursuant to Section 203(f) of the Advisers Act that Respondent Renison be, and hereby is:

barred from association with any investment adviser, broker, dealer, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization.

Any reapplication for association by the Respondent will be subject to the applicable laws and regulations governing the reentry process, and reentry may be conditioned upon a number of factors, including, but not limited to, the satisfaction of any or all of the following: (a) any disgorgement ordered against the Respondent, whether or not the Commission has fully or partially waived payment of such disgorgement; (b) any arbitration award related to the conduct that served as the basis for the Commission order; (c) any self-regulatory organization arbitration award to a customer, whether or not related to the conduct that served as the basis for the Commission order; and (d) any restitution order by a self-regulatory organization, whether or not related to the conduct that served as the basis for the Commission order.

By the Commission.

Jill M. Peterson  
Assistant Secretary