

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 102439 / February 18, 2025

ADMINISTRATIVE PROCEEDING
File No. 3-21943

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In the Matter of	:	
	:	
Raymond Lawrence Lent (dba The	:	ORDER CREATING A FAIR FUND AND
Putney Financial Group, Registered	:	SETTING DEADLINE TO SUBMIT A
Investment Advisors),	:	PROPOSED PLAN OF DISTRIBUTION
	:	
	:	
<u>Respondent.</u>	:	

On May 20, 2024, the Commission issued an Order Instituting Administrative and Cease-and-Desist Proceedings, Pursuant to Section 15(b) of the Securities Exchange Act of 1934 and Sections 203(e) and 203(k) of the Investment Advisers Act of 1940, Making Findings, and Imposing Remedial Sanctions and a Cease-and-Desist Order (the “Order”)¹ against Raymond Lawrence Lent (dba The Putney Financial Group, Registered Investment Advisors) (“Putney” or the “Respondent”). In the Order, the Commission found that from at least April 2016 through October 1, 2021, Putney recommended to its advisory clients, variable annuity investments sponsored by insurance companies that paid upfront sales commission to Putney’s affiliated broker, Portsmouth Financial Services (“Portsmouth”), without disclosing the financial conflict of interest in recommending these variable annuities to its clients. Putney also breached its duty of care to its advisory clients by failing to undertake any analysis as to whether these annuity contracts were in its advisory clients’ best interest.

¹ Exchange Act Rel. No. 100183 (May 20, 2024).

In addition, from at least April 2016 through April 2021, Putney selected for its advisory clients, cash sweep money market funds for which Portsmouth received revenue sharing payments and failed to disclose that these funds were more expensive than lower-cost funds available to those clients. Putney also failed to satisfy its duty of care when it failed to perform any analysis to determine whether the lower-fee money market funds were available and in the best interest of its clients when selecting cash sweep money market funds for its advisory clients. The Commission ordered the Respondent to pay \$707,129.58 in disgorgement and \$183,236.60 in prejudgment interest for a total of \$890,366.18. The Commission also ordered the Respondent to pay \$175,000.00 in civil money penalty to the Commission within 180 days of the date of the Order.

The Respondent has paid in full. The Division of Enforcement (“Division”) now requests that a Fair Fund be created pursuant to Section 308(a) of the Sarbanes-Oxley Act of 2002, so that the \$175,000.00 civil penalty paid by Putney, along with \$707,129.58 in disgorgement, \$183,236.60 in prejudgment interest, and \$3,434.35 in post-order interest for a total paid of \$1,068,800.53, can be distributed to injured investors (the “Fair Fund”).

The Division also recommends that the Commission in accordance with Rule 1101(a) of the Commission’s Rules on Fair Fund and Disgorgement Plans (the “Commission’s Rules”),² set January 9, 2026 as the date by which the Division will submit a proposed plan of distribution (the “Proposed Plan”) for the Fair Fund. In making this recommendation, the Division states that it requires sufficient time to complete the fund administrator solicitation and appointment process, develop the distribution methodology, and prepare the Proposed Plan.

² 17 C.F.R. § 201.1101(a).

Accordingly, for good cause shown, IT IS HEREBY ORDERED that,

- A. Pursuant to Section 308(a) of the Sarbanes-Oxley Act of 2002, a Fair Fund is created for the \$1,068,800.53 in disgorgement, prejudgment interest, post-order interest and civil penalty paid by the Respondent, pursuant to the Order; and
- B. in accordance with Rule 1101(a) of the Commission's Rules,³ the Division will submit the Proposed Plan for the Fair Fund by January 9, 2026.

By the Commission.

Vanessa A. Countryman
Secretary

³ 17 C.F.R. § 201.1101(a).