

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 59458 / February 26, 2009

INVESTMENT ADVISERS ACT OF 1940
Release No. 2847 / February 26, 2009

ADMINISTRATIVE PROCEEDING
File No. 3-13382

In the Matter of

ROSS OWEN HAUGEN,

Respondent.

**ORDER INSTITUTING
ADMINISTRATIVE PROCEEDINGS
PURSUANT TO SECTION 15(b) OF THE
SECURITIES EXCHANGE ACT OF 1934
AND 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 15(b) of the Securities Exchange Act of 1934 (“Exchange Act”) and Section 203(f) of the Investment Advisers Act of 1940 (“Advisers Act”) against Ross Owen Haugen (“Respondent” or “Haugen”).

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 the entry of this Order Instituting Administrative Proceedings Pursuant to Section 15(b)

of the Securities Exchange Act of 1934 and 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 Respondents’ Offer, the Commission finds that:

1. Haugen, 55, resides in greater Minneapolis, Minnesota and was Vice President of Sales & Marketing and a director of Coadum Advisors, Inc. (“Coadum”) from early 2006 through approximately September 2007. During various periods between 1984 and September 2006, Haugen was associated as a registered representative with five broker-dealers. Further, until September 2007, Haugen was associated with an investment adviser.

2. On February 5, 2009, an order of permanent injunction was entered by consent against Haugen, permanently enjoining him from future violations of Section 17(a) of the Securities Act of 1933 and Sections 10(b) and 15(a) of the Exchange Act and Rule 10b-5 thereunder, in the civil action entitled Securities and Exchange Commission v. Ross Owen Haugen, Civil Action Number 1:09-CV-0129-ODE, in the United States District Court, Northern District of Georgia, Atlanta Division.

3. The Commission’s complaint alleged that, from at least January 2006 through January 2008, Coadum and another entity fraudulently raised approximately \$30 million from approximately 150 investors who purchased interests in four entities. As Vice President of Sales & Marketing for Coadum, Haugen directly solicited and sold more than 50% of the securities in the offerings.

4. The Commission’s complaint further alleged that Haugen told investors, falsely, that their investment principal was risk free, insured and never left the escrow account or was otherwise guaranteed against loss. In fact, Haugen knew that investors’ funds were being invested in off-shore trading programs. The complaint also alleged that contrary to representations to investors in the private placement memoranda for the offerings which stated that no commissions would be paid on investments, Haugen received substantial commissions from investor funds.

IV.

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

Accordingly, it is hereby ORDERED:

Pursuant to Section 15(b) of the Exchange Act and Section 203(f) of the Advisers Act, that Respondent Haugen be, and hereby is barred from association with any broker-dealer or investment adviser; and

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.

For the Commission, by its Secretary, pursuant to delegated authority.

Elizabeth M. Murphy
Secretary