

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

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 59994 / May 28, 2009**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-11317**

**In the Matter of**  
  
**Putnam Investment Management, LLC,**  
  
**Respondent.**

**ORDER DIRECTING**  
**DISBURSEMENT OF FAIR FUND**

On March 30, 2007, the Commission published a notice of the Plan of Distribution (“Plan”) proposed by the Division of Enforcement in connection with this proceeding. See Exchange Act Release No. 55561. The Commission received comments, and, on July 20, 2007, the Plan was approved in modified form. See Exchange Act Release No. 56115.

The Plan provides that a Fair Fund consisting of a total of \$153,524,387 in disgorgement and civil penalties, plus additional accumulated interest, will be distributed by the Plan Administrator to injured investors according to the methodology set forth in the Plan. The Plan provides that the Commission staff will arrange for the transfer of a portion of the Fair Fund to Northern Trust Company when a validated payment file with the payee identification information required to make a distribution (“Payment File”) has been received and accepted. The Payment File for the fourth distribution, in the amount of \$4,245,929.44, has been received and accepted by the Commission staff.<sup>1</sup>

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<sup>1</sup> By a Corrected Order Directing Disbursement of Fair Fund dated August 15, 2008, the Commission authorized the first distribution in the amount of \$33,778,470.39. See Exchange Act Release No. 58369A. By an Order Directing Disbursement of Fair Fund dated December 2, 2008, the Commission authorized the second distribution in the amount of \$46,515,302.38. See Exchange Act Release No. 59041. By an Order Directing Disbursement of Fair Fund dated February 25, 2009, the Commission authorized the third distribution in the amount of \$28,128,811.12. See Exchange Act Release No. 59447.

Accordingly, it is ORDERED that the Commission staff shall arrange for the transfer of \$4,199,306.98 of the Fair Fund to Northern Trust Company, and the Plan Administrator shall distribute such amount, plus an additional \$46,622.46 from Fair Fund monies already being held at Northern Trust Company, to the payees identified in the Payment File for the fourth distribution beginning within one business day after such transfer, for a total fourth distribution of \$4,245,929.44, as provided in the Plan.<sup>2</sup>

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

Elizabeth M. Murphy  
Secretary

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<sup>2</sup> As noted above, the Payment File for the fourth distribution reflects payments totaling \$4,245,929.44. Of this amount, \$46,622.46 will be distributed from monies currently being held in an “Undistributed Pool” at Northern Trust Company (pursuant to paragraph 44 of the Plan) to payees who previously could not be located but have now been located.