

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

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 73606 / November 14, 2014**

**INVESTMENT ADVISERS ACT OF 1940**  
**Release No. 3968 / November 14, 2014**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-16156**

**In the Matter of**

**BLAKE RICHARDS,**

**Respondent.**

**CORRECTED ORDER MAKING  
FINDINGS AND IMPOSING REMEDIAL  
SANCTIONS PURSUANT TO SECTION  
15(b) OF THE SECURITIES EXCHANGE  
ACT OF 1934 AND SECTION 203(f) OF  
THE INVESTMENT ADVISERS ACT OF  
1940**

**I.**

On September 23, 2014, the Securities and Exchange Commission (“Commission”) instituted public administrative proceedings 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 Blake Richards (“Richards” or “Respondent”).

**II.**

In response to 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, Respondent consents to the Commission’s jurisdiction over him and the subject matter of these proceedings and to the entry of this Order Making Findings and Imposing Remedial Sanctions Pursuant to Section 15(b) of the Securities Exchange Act of 1934 And Section 203(f) of the Investment Advisers Act of 1940 (“Order”) as set forth below.

### III.

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

1. Richards (CRD #4051402), 36 years of age, was a registered representative and investment adviser representative associated with LPL, a registered broker-dealer and investment adviser. He holds the Series 7, 63 and 65 securities licenses and resides in Buford, GA. Richards utilizes two d/b/a names, Blake Richards Investments and BMO Investments. Richards was associated with Edward Jones from October 1999 until August 2004, with A.G. Edwards & Sons, Inc. from August 2004 to February 2007, with H&R Block Financial Advisors, Inc. (later acquired by Ameriprise Advisor Services, Inc.) from February 2007 to May 2009, and with LPL from May 2009 until May 3, 2013, when he was terminated by LPL.

2. On August 26, 2014, a final judgment was entered against Richards. The final judgment incorporated an earlier order of August 20, 2013, which by consent permanently enjoined Richards from future violations of Sections 17(a) of the Securities Act of 1933, Section 10(b) of the Exchange Act and Rule 10b-5 thereunder, and Sections 206(1) and 206(2) of the Advisers Act, in the civil action entitled Securities and Exchange Commission v. Blake B. Richards, Civil Action Number 1:13-cv-1729, in the United States District Court for the Northern District of Georgia.

3. The Commission's complaint alleged that, since approximately 2008, Richards misappropriated approximately \$2 million from at least six individuals who were his broker-dealer and investment advisor clients. At least two of the investors were elderly, and the majority of the misappropriated funds constituted retirement savings and/or life insurance proceeds from deceased spouses. When his clients informed Richards they had funds available to invest he instructed the investors to write out checks to one of two entities called "Blake Richards Investments" or "BMO Investments," both d/b/a entities used by Richards. Richards represented to the investors that he would invest their funds through his investment vehicle in life insurance, fixed income assets, variable annuities, or household-name stocks. After the transfers were made, Richards misappropriated the 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 Richards'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 Richards be, and hereby is:

barred from association with any broker, dealer, investment adviser, 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.

Brent J. Fields  
Secretary