

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 79824 / January 18, 2017

ADMINISTRATIVE PROCEEDING
File No. 3-17796

In the Matter of

CHARLES A. BENNETT,

Respondent.

**ORDER OF SUSPENSION PURSUANT
TO RULE 102(e)(2) OF THE
COMMISSION'S RULES OF PRACTICE**

I.

The Securities and Exchange Commission (“Commission”) deems it appropriate to issue an order of forthwith suspension of Charles A. Bennett pursuant to Rule 102(e)(2) of the Commission’s Rules of Practice [17 C.F.R. § 200.102(e)(2)].¹

II.

The Commission finds that:

1. Charles A. Bennett, age 58, at all relevant times was an attorney whose office was located in New York, New York.

2. On October 28, 2015, in *United States v. Bennett*, Crim. No. 15-cr-20 (LTS) (S.D.N.Y.), Bennett pleaded guilty to, among others, violations of Section 10(b) of the Exchange Act of 1934 (“Exchange Act”) [15 U.S.C. § 78j(b)], and Rule 10b-5 thereunder, and the Court accepted Bennett’s plea.

¹ Rule 102(e)(2) provides in pertinent part that “[a]ny attorney who has been suspended or disbarred by a court of the United States or any State;... or any person who has been convicted of a felony or a misdemeanor involving moral turpitude shall be forthwith suspended from appearing or practicing before the Commission.”

3. Bennett's conviction arose from his orchestration of a Ponzi-like scheme through which he defrauded over thirty investors—many of them his former legal clients, close friends, and family members—of several million dollars over the course of several years. Specifically, in an effort to illicitly obtain money for his personal use, Bennett had offered investors purported interests in what he described as a pool of funds that invested in joint venture opportunities with a Wyoming-based fund.

4. On May 19, 2016, the Court sentenced Bennett to a prison term of 60 months in a federal penitentiary, and on July 28, 2016, amended that judgment, and sentenced Bennett to a prison term of 60 months in a federal penitentiary, and also ordered Bennett to make restitution in the amount of \$4,569,124.00.

III.

In view of the foregoing, the Commission finds that Bennett has been convicted of a felony, within the meaning of Rule 102(e)(2) of the Commission's Rules of Practice.

Accordingly, it is ORDERED, that Charles A. Bennett is forthwith suspended from appearing or practicing before the Commission pursuant to Rule 102(e)(2) of the Commission's Rules of Practice.

By the Commission.

Brent J. Fields
Secretary