

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**  
**October 12, 2005**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-12084**

**In the Matter of**  
  
**Robert Radano**  
  
**Respondent.**

**ORDER INSTITUTING ADMINISTRATIVE  
PROCEEDINGS PURSUANT TO SECTION  
203(f) OF THE INVESTMENT ADVISERS  
ACT OF 1940 AND NOTICE OF HEARING**

**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 203(f) of the Investment Advisers Act of 1940 (“Advisers Act”) against Robert Radano (“Respondent” or “Radano”).

**II.**

After an investigation, the Division of Enforcement alleges that:

**A.     RESPONDENT**

1.       Radano, 50, is currently the sole owner and principal of the investment advisory firm Washington Investment Network (“WIN”). Radano and WIN are both registered as investment advisers in the State of Connecticut.

**B.     ENTRY OF THE INJUNCTION**

1.       On September 22, 2005, a final judgment was entered against Radano, permanently enjoining him from future violations of Sections 203(f), 206(1) and 206(2) of the Advisers Act in the civil action entitled Securities and Exchange Commission v. Steven M. Bolla, Washington Investment Network, Susan Bolla and Robert Radano, Civil Action Number 1:02CV01506, before the United States District Court for the District of Columbia.

2.       The Commission’s complaint alleges, among other things, that Radano aided and abetted WIN’s violation of a Commission Order issued on June 20, 2000 barring Steven

Bolla from associating with an investment adviser. The Complaint charges that, following the Commission's June 2000 bar order against Bolla, Radano allowed Bolla to associate with WIN by managing the firm's finances for nine months, acting as the investment adviser to WIN clients for ten months, and making business communications on behalf of WIN for three months. The Commission's Complaint also alleges that Radano aided and abetted WIN's violation of the antifraud provisions of the Advisers Act by failing to disclose Bolla's disciplinary history to WIN's clients on behalf of the firm.

3. Following a bench trial, the Honorable Colleen Kollar-Kotelly held, among other things, that Radano committed securities fraud by failing to disclose to the firm's clients that, in June 2000, the SEC had barred Bolla from associating with any investment adviser based on his role in an earlier securities fraud. Judge Kollar-Kotelly held that as a principal of WIN, Radano had a duty to inform the firm's clients that the SEC had barred Bolla from acting as an investment adviser. Judge Kollar-Kotelly also ruled that Radano violated Section 203(f) of the Advisers Act by allowing Bolla to associate with WIN in violation of the SEC bar order. Judge Kollar-Kotelly found that, at the time they formed WIN in 1998, Radano and Bolla believed the SEC would likely bar Bolla from associating with any investment adviser. Judge Kollar-Kotelly found that WIN was established "as a front for Mr. Bolla to continue to operate with his wife as a mere nominee [owner] to officially mask his true interest and control." Judge Kollar-Kotelly further found that after the SEC had barred Bolla, Radano took instructions from Bolla regarding client accounts, permitted Bolla to remain a point of contact for WIN clients and allowed Bolla to continue concealing his association with the firm by using his wife as a nominee. Judge Kollar-Kotelly held that Radano's actions and omissions, individually and on behalf of WIN, permitted Bolla to continue associating with WIN in violation of his bar.

### **III.**

In view of the allegations made by the Division of Enforcement, the Commission deems it necessary and appropriate in the public interest that public administrative be instituted to determine:

A. Whether the allegations set forth in Section II are true and, in connection therewith, to afford Respondent an opportunity to establish any defenses to such allegations; and

B. What, if any, remedial action is appropriate in the public interest against Respondent pursuant to Section 203(f) of the Advisers Act.

### **IV.**

IT IS ORDERED that a public hearing for the purpose of taking evidence on the questions set forth in Section III hereof shall be convened at a time and place to be fixed, and before an Administrative Law Judge to be designated by further order as provided by Rule 110 of the Commission's Rules of Practice, 17 C.F.R. § 201.110.

IT IS FURTHER ORDERED that Respondent shall file an Answer to the allegations contained in this Order within twenty (20) days after service of this Order, as provided by Rule 220 of the Commission's Rules of Practice, 17 C.F.R. § 201.220.

If Respondent fails to file the directed answer, or fails to appear at a hearing after being duly notified, the Respondent may be deemed in default and the proceedings may be determined against him upon consideration of this Order, the allegations of which may be deemed to be true as provided by Rules 155(a), 220(f), 221(f) and 310 of the Commission's Rules of Practice, 17 C.F.R. §§ 201.155(a), 201.220(f), 221(f) and 201.310.

This Order shall be served forthwith upon Respondent personally or by certified mail.

IT IS FURTHER ORDERED that the Administrative Law Judge shall issue an initial decision no later than 210 days from the date of service of this Order, pursuant to Rule 360(a)(2) of the Commission's Rules of Practice.

In the absence of an appropriate waiver, no officer or employee of the Commission engaged in the performance of investigative or prosecuting functions in this or any factually related proceeding will be permitted to participate or advise in the decision of this matter, except as witness or counsel in proceedings held pursuant to notice. Since this proceeding is not "rule making" within the meaning of Section 551 of the Administrative Procedure Act, it is not deemed subject to the provisions of Section 553 delaying the effective date of any final Commission action.

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

Jonathan G. Katz  
Secretary