

**SEC Civil Actions and Administrative Proceedings Regarding Market Timing and Late Trading in Mutual Funds**

Civil Action / Administrative Proceeding	Date Filed	Judgment or Decision	Release No.
In the Matter of Theodore Charles Sihpol III	9/16/2003	Pending	33-8288
In the Matter of Steven B. Markovitz	10/2/2003	10/2/2003	33-8298
In the Matter of James Patrick Connelly Jr.	10/16/2003	10/16/2003	33-8304
SEC v. Justin M. Scott and Omid Kamshad (D. Mass)	10/28/2003	Pending	LR-18428
In the Matter of Putnam Investment Management, LLC	10/28/2003	11/13/2003 4/8/2004	IA-2192, IA-2226
SEC v. Martin J. Druffner, et al. (D. Mass.)	11/4/2003	Pending	LR-18784
SEC v. Invesco Funds Group, Inc. and Raymond R. Cunningham (D. Colo.); <u>settled administratively</u> : In the Matter of Invesco Funds Group, Inc., AIM Advisors, Inc., and AIM Distributors, Inc. In the Matter of Raymond R. Cunningham	12/2/2003		LR-18482
		10/8/2004	34-50506
		10/8/2004	34-50507
SEC v. Mutuals.com, Inc., et al. (N.D. Tex.)	12/4/2003	Pending	LR-18489
In the Matter of Alliance Capital Management, L.P.	12/18/2003	12/18/2003	IA-2205A
SEC v. Daniel Calugar and Security Brokerage, Inc. (D. Nev.)	12/22/2003	Pending	LR-18524
SEC v. Gary L. Pilgrim, Harold J. Baxter, and Pilgrim Baxter & Associates, Ltd. (E.D. Pa.); <u>settled administratively</u> : In the Matter of Pilgrim Baxter & Associates, Ltd. In the Matter of Gary L. Pilgrim In the Matter of Harold J. Baxter	11/20/2003		LR-18474
		6/21/2004	IA-2251
		11/17/2004	33-8505
		11/17/2004	33-8506
SEC v. Security Trust Company, N.A., Grant D. Seeger, William A. Kenyon, and Nicole McCermott (D. Ariz.) (Civil Judgment as to Nicole McDermott) (Civil Judgment as to Security Trust Co., N.A.)	11/25/2003	Pending	LR-18479
		3/3/2004	LR-18606
		3/31/2005	LR-18653
In the Matter of Paul A. Flynn	2/3/2004	Pending	33-8360
In the Matter of Massachusetts Financial Services Co., John W. Ballen, and Kevin R. Parke	2/5/2004	2/5/2004	IA-2213
SEC v. Columbia Management Advisors, Inc. and Columbia Funds Distributor, Inc. (D. Mass.); <u>settled administratively</u> : In the Matter of Columbia Management Advisors, Inc. and Columbia Funds Distributor, Inc.	2/24/2004		LR-18590
		2/9/2005	33-8534

Civil Action / Administrative Proceeding	Date Filed	Judgment or Decision	Release No.
SEC v. PIMCO Advisors Fund Management LLC, et al. (S.D.N.Y.); settled administratively as to the entities, action continues against Stephen J. Treadway and Kenneth W. Corba: In the Matter of PA Fund Management LLC, PEA Capital LLC, and PA Distributors LLC	5/6/2004	Pending	LR-18697
In the Matter of Strong Capital Management, Inc., et al.	5/20/2004	5/20/2004	34-49741; 34-51694
SEC v. Geek Securities, Inc., Geek Advisors, Inc., Kautilya "Tony" Sharma, and Neal R. Wadhwa (S.D. Fla.) (Civil Judgment as to Neal R. Wadhwa) In the Matter of Neal R. Wadhwa	6/4/2004	Pending	LR-18738
		10/14/2004	LR-18938
		11/5/2004	34-50644
In the Matter of Banc One Investment Advisors Corporation and Mark A. Beeson	6/29/2004	6/29/2004	IA-2254
In the Matter of Franklin Advisers, Inc.	8/2/2004	8/2/2004	IA-2271
In the Matter of CIHC, Inc., Conseco Services, LLC, and Conseco Equity Sales, Inc.	8/9/2004	8/9/2004	33-8455
In the Matter of Inviva, Inc. and Jefferson National Life Insurance Co.	8/9/2004	8/9/2004	33-8456
In the Matter of Janus Capital Management, LLC	8/18/2004	8/18/2004	IA-2277
SEC v. JB Oxford Holdings, Inc. et al. (C.D. Cal.)	8/25/2004	Pending	LR-18850
In the Matter of Michael D. Legoski	8/30/2004	8/30/2004	34-50289
In the Matter of Thomas A. Kolbe	8/30/2004	8/30/2004	IA-2288
In the Matter of Timothy J. Miller	8/30/2004	8/30/2004	IA-2289
In the Matter of Charles Schwab & Co., Inc.	9/14/2004	9/14/2004	34-50360
In the Matter of RS Investment Management Inc, RS Investment Management, L.P., Randall Hecht, and Steven M. Cohen	10/6/2004	10/6/2004	IA-2310
In the Matter of Fremont Advisors, Inc.	11/4/2004	11/4/2004	IA-2317
In the Matter of Nancy C. Tengler	11/4/2004	11/4/2004	IA-2318
In the Matter of Larry Adams	11/4/2004	5/19/2005	IA-2388
In the Matter of Southwest Securities, Inc., Daniel R. Leland, Kerry M. Rigdon, and Kevin J. Marsh	1/10/2005	1/10/2005	34-51002
SEC v. Scott B. Gann and George B. Fasciano (N.D. Tex.)	1/10/2005	Pending	LR-19027
In the Matter of Lawrence S. Powell and Delano N. Sta.Ana	1/11/2005	1/11/2005	34-51017
In the Matter of Banc of America Capital Management, LLC, et al.	2/9/2005	2/9/2005	33-8538
In the Matter of Erik Gustafson	2/9/2005	2/9/2005	IA-2354
In the Matter of Joseph Palombo	2/9/2005	2/9/2005	IA-2352
In the Matter of Peter Martin	2/9/2005	2/9/2005	33-8537
In the Matter of Breen Murray & Co.	2/17/2005	2/17/2005	34-51219
In the Matter of John D. Carifa	4/28/2005	4/28/2005	IA-2379
In the Matter of Gerald T. Malone	4/28/2005	4/28/2005	IA-2378
In the Matter of Michael J. Laughlin	4/28/2005	4/28/2005	34-51624