ORDER UNDER SECTION 202(a)(11)(G) OF THE INVESTMENT ADVISERS ACT OF 1940

WLD Enterprises, Inc. filed an application on January 27, 2005, and an amendment and restatement thereto on October 17, 2008, for an order under section 202(a)(11)(G) of the Investment Advisers Act of 1940 ("Act"). The order would declare applicant, certain of applicant’s affiliates specified in the application, and their respective employees acting within the scope of their employment to be persons not within the intent of section 202(a)(11) of the Act, which defines the term "investment adviser."

On October 17, 2008, a notice of the filing of the application was issued (Investment Advisers Act Release No. 2804). The notice gave interested persons an opportunity to request a hearing and stated that an order disposing of the application would be issued unless a hearing was ordered. No request for a hearing has been filed, and the Commission has not ordered a hearing.

The matter has been considered and it is found, on the basis of the information set forth in the application and the amendment thereto, that applicant, certain of applicant’s affiliates specified in the application, and their respective employees acting within the scope of their employment are persons not within the intent of section 202(a)(11) of the Act. Accordingly,
IT IS ORDERED, under section 202(a)(11)(G) of the Act, that the requested exemption by WLD Enterprises, Inc. (File No. 803-180) is hereby granted, effective immediately, subject to the conditions in the application as amended.

For the Commission, by the Division of Investment Management, under delegated authority.

Florence E. Harmon
Acting Secretary