ADMINISTRATIVE PROCEEDING FILE NO. 3-11692

UNITED STATES OF AMERICA Before the SECURITIES AND EXCHANGE COMMISSION November 29, 2004

SECURITIES & EXCHANGE COMMISSION MAILED FOR SERVICE

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FIRST CLASS

In the Matter of

RAYMOND JAMES FINANCIAL SERVICES, INC.,
J. STEPHEN PUTNAM, and
DAVID LEE ULLOM

ORDER GRANTING UNOPPOSED REQUEST FOR DEPOSITIONS

The Securities and Exchange Commission ("Commission") instituted this proceeding on September 30, 2004, pursuant to Section 8A of the Securities Act of 1933, Sections 15(b) and 21C of the Securities Exchange Act of 1934, and Section 203(f) of the Investment Advisers Act of 1940.

On November 23, 2004, the Division of Enforcement ("Division") filed: (1) an Unopposed Motion for the Depositions of Rashed Al Bloushi and Mohamed Hamad¹ ("Motion"), pursuant to Rule 233 of the Commission's Rules of Practice; (2) a Memorandum in Support of the Motion; and (3) a proposed order. See 17 C.F.R. § 201.233. The Division represents that Rashed Mohamed Mehran Al Bloushi and Mohamed Babouker Hamad, residents of the United Arab Emirates, have agreed to have their depositions taken in London. The Division further represents that: (1) the gentlemen will not be in the United States at the time of the public hearing; (2) the gentlemen will likely give testimony that is material to the issues in this administrative proceeding; (3) taking the depositions will serve the interests of justice; and (4) respondents do not object to the Motion.

Ruling

I GRANT the Motion because the Division has satisfied the criteria of Rule 233(b). 17 C.F.R. § 201.233(b). I ORDER that:

¹ The name Hamed and Hamad appear in the pleadings. I will use Hamad to cover both spellings.

- 1. On December 17, 2004, Rashed Mohamed Mehran Al Bloushi and Mohamed Babouker Hamad will give consecutive depositions beginning at 9:30 a.m at the U.S. Embassy, London, at 55-56 Upper Brook Street, London W1A 2 LQ, United Kingdom, (Ph) [44] (0)20-7499-9000;
- 2. Mary Daschbach or other Vice Consul of the U.S. Embassy, London, is designated as the deposition officer for the purpose of administering the necessary oaths before the depositions;
- 3. The depositions will address the topics set forth in the Order Instituting Proceedings issued by the Commission on September 30, 2004, including, but not limited to, Rashed Mohamed Mehran Al Bloushi's investment in Brite Business Corporation's activities and communications related to that investment;
- 4. The depositions will be videotaped and recorded by stenographic means;
- 5. Upon receiving copies of the deposition transcripts, videos, and related exhibits, the Division shall file the original transcripts, videos, and exhibits with the Commission's Secretary. A copy of the deposition transcripts, videos, and exhibits shall be available to the deponents and each party to the proceeding for purchase at a prescribed rate; and
- 6. Leah Willersdorf or other court reporter affiliated with Harry Counsell & Co., Court Reporters, is hereby designated to be the deposition officer for the purpose of recording and transcribing verbatim the questions propounded and all answers or objections, and preparing and certifying the deposition transcripts, videos, and exhibits.

Brenda P. Murray

Chief Administrative Law Judge