

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 53023 / December 27, 2005**

**INVESTMENT ADVISERS ACT OF 1940**  
**Release No. 2468 / December 27, 2005**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-12135**

**In the Matter of**

**BRADFORD C. BLEIDT,**

**Respondent.**

**ORDER INSTITUTING**  
**ADMINISTRATIVE PROCEEDINGS**  
**PURSUANT TO SECTION 15(b) OF THE**  
**SECURITIES EXCHANGE ACT OF 1934**  
**AND SECTION 203(f) OF THE**  
**INVESTMENT ADVISERS ACT OF 1940,**  
**MAKING FINDINGS, AND IMPOSING**  
**REMEDIAL SANCTIONS**

**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 15(b) of the Securities Exchange Act of 1934 (“Exchange Act”) and Section 203(f) of the Investment Advisers Act of 1940 (“Advisers Act”) against Bradford C. Bleidt (“Respondent” or “Bleidt”).

**II.**

In anticipation of the institution of these proceedings, Respondent has submitted an Offer of Settlement (the “Offer”) which the Commission has determined to accept. Solely for the purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, and without admitting or denying the findings herein, except as to the Commission’s jurisdiction over him and the subject matter of these proceedings, and the findings contained in Section III.2 below, which are admitted, Respondent consents to the entry of this Order Instituting Administrative Proceedings Pursuant to Section 15(b)

of the Securities Exchange Act of 1934 and Section 203(f) of the Investment Advisers Act of 1940, Making Findings, and Imposing Remedial Sanctions (“Order”), as set forth below.

### III.

On the basis of this Order and Respondent’s Offer, the Commission finds that:

1. Bleidt was the sole shareholder, officer and director of Allocation Plus Asset Management Company, Inc., an investment adviser registered with the Commission, and was chief executive officer, principal shareholder and director of Financial Perspectives Planning Services, Inc., also an investment adviser registered with the Commission. From at least January 1991 through November 12, 2004, Bleidt was also a registered representative associated with broker-dealers registered with the Commission. Bleidt, 51 years old and currently incarcerated, was a resident of Manchester-By-The-Sea, Massachusetts.

2. On July 26, 2005, Bleidt pled guilty to 115 counts of mail fraud in violation of Title 18 United States Code, Section 1341 and 1342 and one count of money laundering in violation of Title 18 United States Code, Section 1957, in the District of Massachusetts, in United States v. Bradford C. Bleidt, Crim. Information No. 05-10144-WGY. On December 5, 2005, the court entered a judgment of conviction for these offenses and sentenced Bleidt to 135 months in prison followed by three years of supervised release.

3. The offenses of which Bleidt was convicted involve, inter alia, defrauding investors and obtaining money and property by means of materially false and misleading statements and using the United States mails to send false account statements.

### IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanctions agreed to in Respondent Bleidt’s Offer.

Accordingly, it is hereby ORDERED:

Pursuant to Section 15(b)(6) of the Exchange Act and Section 203(f) of the Advisers Act, that Respondent Bleidt be, and hereby is barred from association with any broker, dealer, or investment adviser.

Any reapplication for association by the Respondent will be subject to the applicable laws and regulations governing the reentry process, and reentry may be conditioned upon a number of factors, including, but not limited to, the satisfaction of any or all of the following: (a) any disgorgement ordered against the Respondent, whether or not the Commission has fully or partially waived payment of such disgorgement; (b) any arbitration award related to the conduct that served as the basis for the Commission order; (c) any self-regulatory organization arbitration award to a

customer, whether or not related to the conduct that served as the basis for the Commission order; and (d) any restitution order by a self-regulatory organization, whether or not related to the conduct that served as the basis for the Commission order.

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

Nancy M. Morris  
Secretary