

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

**INVESTMENT ADVISERS ACT OF 1940**

**Release No. 2442 / October 12, 2005**

**ADMINISTRATIVE PROCEEDING**

**File No. 3-12084**

**PUBLIC ADMINISTRATIVE PROCEEDINGS INSTITUTED AGAINST ROBERT RADANO**

On October 12, 2005, the Securities and Exchange Commission (Commission) entered an Order Instituting Public Administrative Proceedings Pursuant to Section 203(f) of the Investment Advisers Act of 1940 (Order) against Robert Radano. In the Order, the Division of Enforcement alleges that, 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 Investment Advisers Act of 1940 ("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.

The Commission's complaint alleges 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.

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.

A hearing will be scheduled before an administrative law judge to determine whether the allegations contained in the Order are true, to provide Radano an opportunity to dispute these allegations, and to determine what remedial sanctions, if any, are appropriate and in the public interest. The Commission directed that an administrative law judge shall issue an initial decision in this matter within 210 days from the date of service of the Order Instituting Proceedings.