

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

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 66879 / April 30, 2012**

**INVESTMENT ADVISERS ACT OF 1940**  
**Release No. 3402 / April 30, 2012**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-14859**

**In the Matter of**

**EDWARD D. PUTTICK, SR.,**

**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 Edward D. Puttick, Sr. (“Respondent” or “Puttick”).

**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. From August 1991 through August 2006, Respondent was President of Advanced Planning Securities, Inc. (“Advanced Planning”), a broker-dealer that, during this period, was registered with the Commission pursuant to Section 15(b) of the Exchange Act. Puttick has been a registered representative with Waterford Investors Services, Inc., a broker-dealer and investment adviser registered with the Commission, from January 2, 2009 through the present. Puttick, age 72, resides in Setauket, New York.

2. On April 12, 2012, a final judgment was entered by consent against Puttick, permanently enjoining him from future violations of Sections 5(a) and 5(c) of the Securities Act of 1933, in the civil action entitled Securities and Exchange Commission v. Charles C. Slowey, Jr., et al., Civil Action Number 09 Civ. 4547 (LDW) (ETB), in the United States District Court for the Eastern District of New York.

3. The Commission’s complaint alleges that from approximately March 2004 through August 2006, Puttick authorized registered representatives at Advanced Planning to sell interests in the Endeavor Real Estate Fund I, LLC, Endeavor Real Estate Fund II, LLC, Endeavor America Fund, LLC, and Windsor Lake Estates, LLC (collectively, the “Endeavor Funds”). There was no registration statement in effect for interests in the Endeavor Funds, and no exemption from the registration requirements applied to these interests.

### IV.

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

Accordingly, it is hereby ORDERED:

Pursuant to Section 15(b) of the Exchange Act and Section 203(f) of the Exchange Act, that Respondent Puttick be, and hereby is:

- (a) suspended from association with any broker, dealer, investment adviser, municipal securities dealer, or transfer agent for a period of twelve months, effective on the second Monday following entry of this Order; and
- (b) suspended from participating in any offering of a penny stock, including: acting as a promoter, finder, consultant, agent or other person who engages in activities with a broker, dealer or issuer for purposes of the issuance or trading in any penny stock, or inducing or attempting to induce the purchase or sale of any penny stock for a period of twelve months, effective on the second Monday following entry of this Order.

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.

By the Commission.

Elizabeth M. Murphy  
Secretary