

BEFORE THE ARKANSAS SECURITIES COMMISSIONER

RECEIVED

CASE NO. S-10-0111

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ARKANSAS SECURITIES DEPT.

IN THE MATTER OF:

Order No. S-10-0111-11-OR01

**Claymore Securities Defined Portfolios,
Series 637 (Global Water
Equities Portfolio, Series 17)**

RESPONDENT

CONSENT ORDER

This Consent Order is entered pursuant to the Arkansas Securities Act, codified at Ark. Code Ann. §§ 23-42-101 through 23-42-509 (“Act”), the Rules of the Arkansas Securities Commissioner (“Rules”) promulgated under the Act, and the Arkansas Administrative Procedures Act, codified at Ark. Code Ann. §§ 25-15-201 through 25-15-219 in accordance with an agreement by and between the Staff of the Arkansas Securities Department (“Staff”) and Claymore Securities Defined Portfolios, Series 637 (Global Water Equities, Series 17) (“Claymore Series 637”) in full and final settlement of all claims that could be brought against Claymore Series 637 by the Staff on the basis of the facts set forth herein.

Claymore Series 637 admits the jurisdiction of the Act and the Arkansas Securities Commissioner (“Commissioner”), waives its right to a formal hearing, consents to the entry of this order, and agrees to abide by its terms. Claymore Series 637 also agrees that entry of this order has no impact on its civil liability to Arkansas investors under Ark. Code Ann. § 23-42-106 for the violations detailed below.

FINDINGS OF FACT

1. On or about November 17, 2009, Claymore Series 637 filed a Form NF with the Arkansas Securities Department (“Department”). As part of this notice filing the

Department received a \$150.00 filing fee from Claymore Series 637 for an amount of securities to be offered in Arkansas for \$150,000. The filing became effective on November 19, 2009.

2. Agents or employees of Claymore Series 637 made sales of securities in a Claymore Series 637 offering in excess of the \$150,000 in the amount of \$346,503.62. Sales were made in excess by \$143,211.41 on February 19, 2010, \$4,995.38 on March 11, 2010, \$7,010.51 on April 13, 2010, and \$41,286.32 on May 20, 2010.

3. Claymore Series 637 did not file an amendment increasing the amount of securities to be sold in Arkansas until November 2, 2010, shortly before the filing was to expire on November 19, 2010.

4. In violation of Ark. Code Ann. § 23-42-509(b), Claymore Series 637 failed to file an amendment increasing the amount of securities proposed to be offered in Arkansas until after the sales were made.

5. In settlement of this matter, Claymore Series 637 has agreed to pay a fine and reevaluate its procedures for estimating the appropriate notice filing fee pursuant to Ark. Code Ann. § 23-42-509(a)(1)(A).

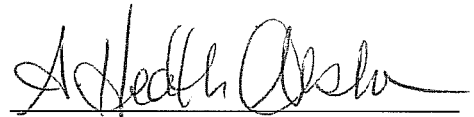
CONCLUSIONS OF LAW

6. A notice filing relating to a covered security may be amended after its effective date so as to increase the securities specified as proposed to be offered pursuant to Ark. Code Ann. § 23-42-509(b). Claymore Series 637's filing of an amendment increasing the amount of securities to be sold in Arkansas with the Department approximately seven months after the sale of securities in the Claymore Series 637 offerings to Arkansas residents as detailed in paragraphs 1-4 is a violation of Ark. Code Ann. § 23-42-509(b).

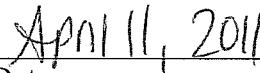
7. Entry of this Order does not affect the civil liability of Claymore Series 637 under Ark. Code Ann. § 23-42-106 for Arkansas investors in the Claymore Series 637 offerings.

ORDER

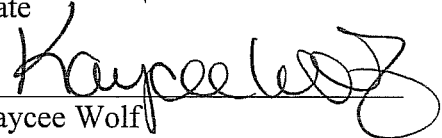
IT IS THEREFORE ORDERED that Claymore Series 637 pay a fine in the amount of \$500.00 and reevaluate its procedures for estimating the appropriate notice filing fee pursuant to Ark. Code Ann. § 23-42-509(a)(1)(A).



A. Heath Abshure
Arkansas Securities Commissioner

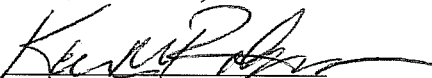


Date



Kaycee Wolf
Staff Attorney

Claymore Securities Defined
Portfolios, Series 637
(Closed-End National Municipal
Portfolio, Series 16)

By: 

Title: _____

Date: _____