

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 69462 / April 25, 2013

INVESTMENT ADVISERS ACT OF 1940
Release No. 3595 / April 25, 2013

ADMINISTRATIVE PROCEEDING
File No. 3-15304

In the Matter of

TIMOTHY R. REDPATH,

Respondent.

**ORDER INSTITUTING
ADMINISTRATIVE PROCEEDINGS
PURSUANT TO SECTION 15(b)(6) 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)(6) of the Securities Exchange Act of 1934 (“Exchange Act”) and Section 203(f) of the Investment Advisers Act of 1940 (“Advisers Act”) against Timothy R. Redpath (“Redpath” or “Respondent”).

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)(6) 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. Redpath, age 55, resides in Mill Valley, California. He was the part owner of Capital Solutions Management, LP, an investment adviser that was registered with the State of California from approximately 2002 through 2010, the part owner of Capital Solutions Distributors, LLC (“CSD”), a broker-dealer that was registered with the Commission from approximately 2004 through 2010, and was a registered representative associated with CSD and other broker-dealers registered with the Commission.

2. On April 16, 2013, a final judgment was entered by consent against Redpath, permanently enjoining him from future violations of Sections 17(a)(2) and (3) of the Securities Act of 1933, ordering him to pay disgorgement and prejudgment interest totaling \$685,969, and ordering him to pay a \$130,000 civil penalty, in the civil action entitled Securities and Exchange Commission v. True North Finance Corp., et al., Civil Action Number 10-cv-3995, in the United States District Court for the District of Minnesota.

3. The Commission’s complaint alleged, among other things, that Redpath failed to make adequate disclosure of the default of the sole borrower of the Capital Solutions Monthly Income Fund (“Fund”), the Fund’s foreclosure on that borrower, and the Fund’s loss of investment income resulting from the borrower’s default.

IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanctions agreed to in Respondent Redpath’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 Redpath be, and hereby is:

barred from association with any broker, dealer, investment adviser, municipal securities dealer, or transfer agent; and

barred 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.

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