

UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549

ADMINISTRATIVE PROCEEDINGS RULINGS  
Release No. 4587/February 3, 2017

ADMINISTRATIVE PROCEEDING  
File No. 3-17813

In the Matter of

WINDSOR STREET CAPITAL, L.P.  
(F/K/A/ MEYERS ASSOCIATES, L.P.) and  
JOHN DAVID TELFER

PROTECTIVE ORDER

On January 31, 2017, the Division of Enforcement submitted a motion for a protective order to cover confidential financial and personal identifying information of third parties in its investigative file. The motion notes that while Rule of Practice 230(b)(2), 17 C.F.R. § 201.230(b)(2), permits the Division to redact such confidential information before producing its investigative file, in this case redaction would be “unduly onerous.” Mot. at 2. The Division’s proposed protective order would (1) limit the parties’ use of the produced documents to this proceeding and (2) require the parties to redact any confidential information before filing it with the Office of the Secretary. *Id.* The Division notes that Respondent Windsor Street Capital, L.P. (f/k/a Meyers Associates, L.P.) does not object to the requested protective order and Respondent John David Telfer takes no position. *Id.* at 1.

I GRANT the motion and adopt the following protective order, but note that the order limits Respondents’ use of confidential information only, and does not limit their use of non-confidential information to this proceeding. I find that the harm resulting from disclosure would outweigh the benefits of disclosure. *See* 17 C.F.R. § 201.322(b).

**Protective Order**

As used in this Protective Order, the term “Confidential Information” shall mean any documents or other information containing any one or more of the following categories of personal and private documents or information: (a) social security or tax identification number; (b) financial account number, including bank account, brokerage account, and investment account information; (c) credit card or debit card number; (d) passport number, driver’s license number, or state-issued identification number; (e) home address, home telephone number, or personal email address of an individual; (f) the name of any individual person known to be less than eighteen years old; (g) dates of birth; and (h) any sensitive information concerning financial condition or medical history. It does not include the last four digits of a social security number,

financial account number, or phone number; the city and state of an individual's home address; the year of an individual's birth; the minor's and mother's maiden name initials; or copies of unredacted filings by regulated entities or registrants that are available on the Securities and Exchange Commission's public website.

The Division and Respondents shall maintain the confidentiality of the Confidential Information, shall use it solely for the purposes of this proceeding, and shall not disclose it to any third party. Should either the Division or Respondents wish to publicly file any document containing any Confidential Information in this proceeding, each will ensure that the Confidential Information is redacted in those copies submitted to the Secretary's Office for public filing.

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Brenda P. Murray  
Chief Administrative Law Judge