

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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SECURITIES AND  
EXCHANGE COMMISSION,

Plaintiff,

Case No.: 10-CV-2399

v.

Judge John F. Grady

JEFFREY R. NEUFELD and  
PARIDON CAPITAL MANAGEMENT LLC  
f/k/a TRITONE CAPITAL MANAGEMENT, LLC

Magistrate Judge Nolan

Defendants.

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**FINAL JUDGMENT AS TO DEFENDANTS**

The Securities and Exchange Commission (the “Commission”) having filed a Complaint and Defendants Jeffrey R. Neufeld (“Neufeld”) and Paridon Capital Management, LLC f/k/a Tritone Capital Management, LLC (“Paridon”) (collectively, the “Defendants”), having entered general appearances; consented to the Court’s jurisdiction over Defendants and the subject matter of this action; consented to entry of a Judgment for Permanent Injunctions and Disgorgement (Docket No. 20); consent to entry of this Final Judgment without admitting or denying the allegations of the Complaint (except as to jurisdiction); waived findings of fact and conclusions of law; and waived any right to appeal from this Judgment:

I.

**IT IS ORDERED** that this Court sets a civil penalty in the amount of \$75,000 pursuant to Section 209(e) of the Investment Adviser Act of 1940 [15 U.S.C. 80b-9(e)] against Neufeld

and no civil penalty against Paridon. In light of the pending Chapter 13 case filed by Jeffrey R. Neufeld ("Neufeld"), In re: Jeffrey R. Neufeld, Case No. 11-25742 (Bk. N.D. Ill. 2011), the Commission shall enforce its judgment through the bankruptcy proceeding. Within 14 days following the entry of this Final Judgment, Neufeld shall amend the Neufeld bankruptcy plan to include the civil penalty amount of \$75,000 as an unsecured nonpriority claim. Any payments made pursuant to the bankruptcy plan shall be by certified check, bank cashier's check, or United States postal money order payable to the Securities and Exchange Commission. The payment shall be delivered or mailed to the Office of Financial Management, Securities and Exchange Commission, 100 F Street, NE, Stop 6042, Washington DC 20549, and shall be accompanied by a letter identifying Defendant Jeffrey R. Neufeld as a defendant in this action; setting forth the title and civil action number of this action and the name of this Court; and specifying that payment is made pursuant to this Final Judgment. Neufeld agrees to provide counsel for the Commission with evidence of any payments. The Commission shall remit the funds paid pursuant to this paragraph to the United States Treasury. Nothing in this judgment shall prevent the Commission from enforcing its judgment outside the bankruptcy proceeding if the bankruptcy is dismissed, the automatic stay is lifted, or Neufeld is not granted a discharge.

II.

**IT IS FURTHER ORDERED** that the Consents are incorporated herein with the same force and effect as if fully set forth herein, and that Defendants shall comply with all of the undertakings and agreements set forth therein.

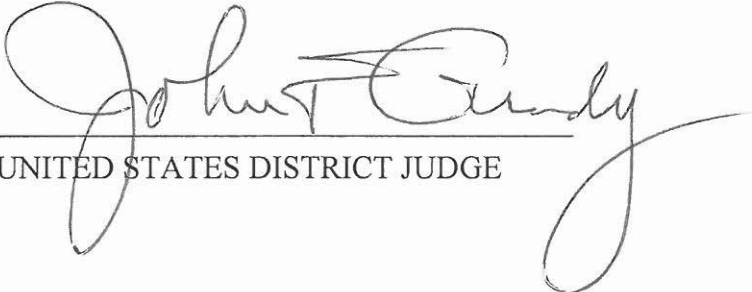
III.

**IT IS FURTHER ORDERED** that this Court retains jurisdiction of this matter for the purposes of enforcing the terms of this Final Judgment.

IV.

There being no just reason for delay, pursuant to Rule 54(b) of the Federal Rules of Civil Procedure, the Clerk is ordered to enter this Final Judgment forthwith and without further notice.

Dated: 11/17/2011

  
UNITED STATES DISTRICT JUDGE