

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

ADMINISTRATIVE PROCEEDINGS RULINGS  
Release No. 4296/October 21, 2016

ADMINISTRATIVE PROCEEDING  
File No. 3-16462

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In the Matter of

LYNN TILTON; :  
PATRIARCH PARTNERS, LLC; :  
PATRIARCH PARTNERS VIII, LLC; : ORDER  
PATRIARCH PARTNERS XIV, LLC; and :  
PATRIARCH PARTNERS XV, LLC :

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The Securities and Exchange Commission instituted this proceeding with an Order Instituting Proceedings (OIP) on March 30, 2015. The OIP alleges that Respondents violated the antifraud provisions of the Investment Advisers Act of 1940 in their operation of three collateral loan obligation funds (known as the Zohar Funds) by reporting misleading values for the assets held by the funds and failing to disclose a conflict of interest arising from Lynn Tilton's undisclosed approach to categorization of assets. The proceeding was stayed by order of the U.S. Court of Appeals for the Second Circuit between September 17, 2015, and June 2016. *See Tilton v. SEC*, 824 F.3d 276, 291 (2d Cir. 2016); *Tilton v. SEC*, No. 15-2103 (2d Cir.), ECF Nos. 76, 125. The hearing is currently scheduled to commence on October 24, 2016.

Subpoenas directed to MBIA were issued on May 27, 2015, and September 16, 2016, at Respondents' request. Under consideration are: (1) Respondents' October 5, 2016, motion to compel MBIA to produce documents responsive to the September 16, 2016, subpoena; and (2) October 20 and 21, 2016, correspondence concerning the service, or lack thereof, of the motion on MBIA. Whether, or when, service of the motion on MBIA occurred, counsel for MBIA<sup>1</sup> is now aware of the motion. MBIA will be ordered to respond to the motion by October 28, 2016.

This order shall be served on: Jonathan Hoff and Joshua P. Arnold, Cadwalader, 200 Liberty St., New York, NY 10281.

IT IS SO ORDERED.

/s/ Carol Fox Foelak  
Carol Fox Foelak  
Administrative Law Judge

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<sup>1</sup> If Jonathan Hoff of Cadwalader does not represent MBIA in this matter, he is requested to advise the parties of the identity of MBIA's legal representative.