

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT ADVISERS ACT OF 1940
Release No. 3230 / July 1, 2011

ADMINISTRATIVE PROCEEDING
File No. 3-14449

In the Matter of

Jeffrey R. Neufeld,

Respondent.

**ORDER INSTITUTING
ADMINISTRATIVE PROCEEDINGS
PURSUANT TO 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 203(f) of the Investment Advisers Act of 1940 (“Advisers Act”) against Jeffrey R. Neufeld (“Neufeld” 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. 3 below, which are admitted, Respondent consents to the entry of this Order Instituting Administrative Proceedings Pursuant to 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. Neufeld, age 36, is the founder, owner, and manager of Paridon Capital Management, LLC (“Paridon”), an unregistered investment adviser. Neufeld is not registered with the Commission and lives in Elgin, Illinois.

2. Paridon is an Illinois limited liability corporation based in Elgin, Illinois. Neufeld started Paridon in January 2006 as Tritone Capital Management, LLC but changed its name in April 2009. Paridon is the general partner and investment adviser to the TCM Global Strategy Fund, LP, (“TCM Fund” or the “Fund”), an unregistered investment commodity pool that, among other things, invested in securities. Neufeld handled the day-to-day management of the TCM Fund and oversaw the Fund’s investment portfolio on Paridon’s behalf. Paridon was also the general partner and investment adviser to the Paridon Currency Fund, LP, an unregistered investment pool.

3. On April 27, 2011, a judgment was entered by consent against Neufeld and Paridon permanently enjoining them from future violations of Section 17(a) of the Securities Act of 1933, Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5 thereunder, and Sections 206(1), 206(2), 206(3), and 206(4) of the Advisers Act and Rule 206(4)-8 thereunder, in the civil action entitled Securities and Exchange Commission v. Jeffrey R. Neufeld and Paridon Capital Management, LLC f/k/a Tritone Capital Management, LLC, Civil Action Number 10-2399, in the United States District Court for the Northern District of Illinois.

4. The Commission’s complaint alleged, among other things, that since 2006, Neufeld and Paridon reported and disseminated false and fictitious rates of returns and assets under management to TCM Fund investors and prospective investors. Neufeld and Paridon also used false performance and assets under management to lure prospective investors to join the TCM Fund and continued to report false rates of return to hide trading losses from investors. Neufeld and Paridon also engaged in improper self-dealing by having the TCM Fund purchase \$75,000 of “debt securities” from its general partner, Paridon. Investors were never told about this purchase, which was actually a loan by the Fund to Paridon.

IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanctions agreed to in Respondent’s Offer.

Accordingly, it is hereby ORDERED pursuant to Section 203(f) of the Advisers Act that Respondent Jeffrey R. Neufeld be, and hereby is:

barred from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization.

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