

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT ADVISERS ACT OF 1940
Release No. 3851 / June 10, 2014

ADMINISTRATIVE PROCEEDING
File No. 3-15922

In the Matter of

SAUL MEYER

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 Saul Meyer. (“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, 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. Respondent, age 43, resides in Dallas, Texas. Respondent was the founder and, during the period of the conduct described below, managing partner of Aldus Equity Partners. Respondent was also the managing partner of Aldus Capital, LLC, a registered investment adviser ("Aldus"). Respondent held a Series 65 license during the relevant period.

2. On May 12, 2009, the Commission filed a Third Amended Complaint ("Complaint") naming Respondent as a defendant in a civil action pending in the United States District Court for the Southern District of New York, SEC v. Morris et al., Civil Action No. 09-CV-2518. The Commission's Complaint alleges, inter alia, that, in connection with the sale of securities to the New York Common Retirement Fund ("Common Fund") and the investment of Common Fund assets in the purchase and sale of securities, Respondent participated in a fraudulent scheme involving undisclosed kickback payments made by investment management firms, including Aldus, to Henry Morris and others.

3. On October 6, 2009, Respondent pled guilty to a felony violation of the Martin Act, New York General Business Law § 352-c(6), before the Supreme Court of the State of New York, County of New York, The People of the State of New York vs. Saul Meyer, Supreme Court Indictment No. 4755/09. In conjunction with his guilty plea, Meyer also agreed to forfeit \$1 million. On December 5, 2012, a judgment in the criminal case was entered against Respondent, and he was sentenced to a three-year period of conditional discharge.

4. On May 22, 2014, the United States District Court for the Southern District of New York entered, by consent, a final judgment against Respondent permanently enjoining him from future violations of Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5 thereunder, Section 17(a) of the Securities Act of 1933, and Sections 206(1) and (2) of the Advisers Act.

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 be, and hereby is barred from association with any broker, dealer, investment adviser, municipal securities dealer, or transfer agent, with the right to reapply for reentry after seven years to the appropriate self-regulatory organization, or if there is none, the Commission.

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.

Jill M. Peterson
Assistant Secretary