

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**INVESTMENT ADVISERS ACT OF 1940**  
**Release No. 3880 / July 23, 2014**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-15981**

**In the Matter of**  
  
**JOHN VINCENT GRECO,**  
  
**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 John Vincent Greco (“Greco” 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, Respondent consents to the Commission’s jurisdiction over him and the subject matter of these proceedings and 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. Greco is a resident of Darien, Connecticut. From approximately August 2009 to December 2011, Greco served as the President of DFS Capital Management, LP ("DFS"). DFS was registered under the Connecticut Uniform Securities Act as an investment adviser from August 6, 2009 to December 31, 2011, when it failed to renew its registration.

2. On May 1, 2013, Greco consented to an order issued by the Connecticut Department of Banking in In the Matter of DFS Capital Management, LP, John Vincent Greco, and DFS Fund, LP., No. CO-12-8048-S. The order barred Greco for ten years from the securities and investment adviser business in Connecticut.

3. The order alleged that Greco transacted business as an unregistered investment adviser agent of DFS by providing investment advice regarding securities to DFS Fund, LP, DFS' investment advisory client, for compensation even though Greco was not registered as an investment adviser agent under the Connecticut Uniform Securities Act; Greco made misrepresentations and omissions regarding DFS Fund to at least two investors, and two investors in DFS Fund each incurred more than \$100,000 in trading losses. The order also alleged that Greco made a false or misleading statement to the Connecticut Department of Banking during its investigation. The order stated that Greco violated Sections 36b-4(a), 36b-4(b), 36b-6(c)(2), and 36b-23 of the Connecticut Uniform Securities Act. On July 25, 2013, the Connecticut Department of Banking found that Greco violated the terms of the order by failing to repay one investor pursuant to the terms of the order and that, as a result, the allegations were deemed admitted by Greco.

### IV.

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

Accordingly, it is hereby ORDERED pursuant to Section 203(f) of the Advisers Act that Respondent Greco 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

with the right to apply for reentry after ten years to the appropriate self-regulatory organization, or if there is none, to 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 or any state securities commission (or any agency or officer performing like functions), whether or not related to the conduct that served as the basis for the Commission order.

By the Commission.

Jill M. Peterson  
Assistant Secretary