

**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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**PLAINTIFF'S MOTION FOR ENTRY OF AGREED FINAL JUDGMENT**

Plaintiff Securities and Exchange Commission (the "Commission") respectfully moves this Court for entry of the proposed agreed final judgment as to Jeffrey R. Neufeld ("Neufeld") and Paridon Capital Management, LLC f/k/a Tritone Capital Management, LLC ("Paridon") (collectively, the "Defendants"), a copy of which is attached as Exhibit 1. In support of the motion, the Commission states as follows:

1. On April 19, 2010, the Commission filed a Complaint against Defendants for violating the federal securities laws. (Docket No. 1) The Commission alleges that Paridon, an unregistered investment adviser, and its owner, Neufeld, fraudulently operated the TCM Global Strategy Fund, LP an unregistered investment commodity pool, by reporting false and fictitious rates of returns and assets under management to investors and prospective investors. The Court entered a Preliminary Injunction Order on April 21, 2010.

2. The Defendants on April 27, 2010 consented to the entry of an order that permanently enjoined them from violating Section 17(a) of the Securities Act of 1933, Sections 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5 thereunder, Sections 206(1),

206(2), 206(3), and 206(4) of the Investment Advisers Act of 1940 (“Advisers Act”) and Rule 206(4)-8 thereunder. (Docket No. 20) The Defendants also agreed to pay \$53,182.33 in disgorgement and prejudgment interest to an investor in the Paridon Currency Fund, LP, an unregistered investment pool also managed by Defendants. The order did not resolve the appropriateness or amount of a civil penalty.

3. The Defendants now agree to the entry of the proposed final judgment which sets a civil penalty in the amount of \$75,000 pursuant to Section 209(e) of the Advisers Act [15 U.S.C. 80b-9(e)] against Neufeld and no civil penalty against Paridon. Defendants executed a consent to the entry of the proposed final judgment, a copy of which is attached as Exhibit 2.

4. The entry of the proposed final judgment obviates the need for a hearing on the merits, conserves judicial resources, and resolves this lawsuit.

Dated: November 10, 2011

Respectfully submitted,

By: /s/ Andrew Shoenthal

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*Attorneys for the Plaintiff Securities and  
Exchange Commission*

**CERTIFICATE OF SERVICE**

I hereby certify that, on November 10, 2011, I caused a copy of the foregoing **Plaintiff's Motion for Entry of Agreed Final Judgment** to be served upon the following counsel by the Court's ECF system and email:

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**/s/ Andrew Shoenthal**  
Andrew Shoenthal