

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

INVESTMENT ADVISERS ACT OF 1940  
Release No. 2865 / April 10, 2009

Administrative Proceeding  
File No. 3-13438

**IN THE MATTER OF GLENN MANTERFIELD**

On April 10, 2009, the Commission issued an Order Instituting Administrative Proceedings Pursuant to Section 203(f) of the Investment Advisers Act of 1940 and Notice of Hearing (Order) against Glenn Manterfield of the United Kingdom, based on the entry of an injunction in the civil action SEC v. Lydia Capital, LLC, et al., Civil Action No. 07-CV-10712-RGS, in the United States District Court for the District of Massachusetts.

On April 8, 2009, the United States District Court for the District of Massachusetts entered a Final Judgment of Permanent Injunction enjoining Manterfield from violating 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) and 206(2) of the Investment Advisers Act of 1940.

The Division of Enforcement alleges in the Order that the Commission's amended complaint alleged that from at least June 2006 through April 2007, Manterfield sold limited partnership interests and retained investors in Lydia Capital Alternative Investment Fund LP (the Fund) through a series of material misrepresentations and omissions, including but not limited to: (1) materially overstating, and in some instances completely fabricating the Fund's performance; (2) inventing business partners, offices, and investors in an attempt to legitimize the firm and concealing the truth as to why key vendors and banks ceased relationships with the Respondent; (3) making material misstatements and omissions about Manterfield's significant criminal history, and failing to disclose a February 2007 criminal asset freeze in England; (4) making material misstatements and omissions about how the Fund planned to address certain material risks and failing to disclose others; and (5) misstating the nature of the Fund's assets and its investment process. The amended complaint also alleged that Manterfield misappropriated millions of dollars of investors' funds by withdrawing investor monies to which they were not entitled.

A hearing will be scheduled before an administrative law judge to determine whether the allegations contained in the Order are true, to provide Manterfield an opportunity to dispute the allegations, and to determine what, if any, remedial action is appropriate and in the public interest pursuant to Section 203(f) of the Investment Advisers Act of 1940. The Order requires the Administrative Law Judge to issue an initial decision no later than

210 days from the date of service of the Order, pursuant to Rule 360(a)(2) of the Commission's Rules of Practice.