

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

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 62720 / August 13, 2010**

**INVESTMENT ADVISERS ACT OF 1940**  
**Release No. 3068 / August 13, 2010**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-14007**

**In the Matter of**

**PAUL GREENWOOD,**

**Respondent.**

**ORDER INSTITUTING  
ADMINISTRATIVE PROCEEDINGS  
PURSUANT TO SECTION 15(b) OF THE  
SECURITIES EXCHANGE ACT OF 1934  
AND 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 15(b) of the Securities Exchange Act of 1934 (“Exchange Act”) and Section 203(f) of the Investment Advisers Act of 1940 (“Advisers Act”) against Paul Greenwood (“Greenwood” 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.2 below, which are admitted, Respondent consents to the entry of this Order Instituting Administrative Proceedings Pursuant to Section 15(b) of the Securities Exchange Act of 1934 and 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. Greenwood, age 63, resides in North Salem, New York. From at least 1996 to February 2009, he was the co-general partner, Chief Operating Officer and Chief Financial Officer of WG Trading Company, Limited Partnership, a registered broker-dealer. Greenwood was also a minority owner of Westridge Capital Management, Inc., a registered investment adviser. Greenwood holds Series 3 and 63 licenses.

2. On July 29, 2010, a judgment was entered by consent against Greenwood, permanently enjoining him from future violations of Section 17(a) of the Securities Act of 1933, Section 10(b) of the Exchange Act and Rule 10b-5 thereunder, and Sections 206(1), 206(2) and 206(4) of the Advisers Act and Rule 206(4)-8 thereunder, in the civil action entitled Securities and Exchange Commission v. WG Trading Investors, L.P., et al., Civil Action Number 09 CV 1750 (GBD), in the United States District Court for the Southern District of New York.

3. The Commission's complaint alleged that, since at least 1996, Greenwood solicited investors by promising to invest their money in an enhanced equity index strategy. However, instead of investing the money as promised, Greenwood misappropriated investor funds for his own personal use.

### IV.

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

Accordingly, it is hereby ORDERED:

Pursuant to Section 15(b)(6) of the Exchange Act and Section 203(f) of the Advisers Act, that Respondent Greenwood be, and hereby is barred from association with any broker, dealer, or investment adviser.

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.

For the Commission, by its Secretary, pursuant to delegated authority.

Elizabeth M. Murphy  
Secretary

Service List

Rule 141 of the Commission's Rules of Practice provides that the Secretary, or another duly authorized officer of the Commission, shall serve a copy of the Order Instituting Administrative Proceedings Pursuant to Section 15(b) of the Securities Exchange Act of 1934 and Section 203(f) of the Investment Advisers Act of 1940, Making Findings and Imposing Remedial Sanctions ("Order") on the Respondent and his legal agent.

The attached Order has been sent to the following parties and other persons entitled to notice:

Honorable Brenda P. Murray  
Chief Administrative Law Judge  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549-2557

Thomas P. Smith, Jr., Esq.  
New York Regional Office  
Securities and Exchange Commission  
Three World Financial Center, Suite 400  
New York, NY 10281

Mr. Paul Greenwood  
c/o Frederick P. Hafetz, Esq.  
Hafetz Necheles & Rocco  
500 Fifth Avenue, 29<sup>th</sup> Floor  
New York, NY 10110

Frederick P. Hafetz, Esq.  
Hafetz Necheles & Rocco  
500 Fifth Avenue, 29<sup>th</sup> Floor  
New York, NY 10110  
(Counsel for Paul Greenwood)