

**ADMINISTRATIVE PROCEEDING**

**BEFORE THE**

**SECURITIES COMMISSIONER OF SOUTH CAROLINA**

**IN THE MATTER OF:** )  
 )  
**Paul Pomfret,** )  
**PDP Management, LP** )  
**(d/b/a "PDP Capital Investments"), and** )  
**PDP Growth Fund, LP,** )  
 )

**CEASE AND DESIST ORDER**

**File No. 11026**













