

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

- against -

WG TRADING INVESTORS, L.P, WG TRADING  
COMPANY, LIMITED PARTNERSHIP,  
WESTRIDGE CAPITAL MANAGEMENT INC.,  
PAUL GREENWOOD and STEPHEN WALSH

Defendants,

- and -

ROBIN GREENWOOD and JANET WALSH

Relief Defendants.

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Civ. No.  
09-CIV-1750 (GBD)

**ANSWER**

Defendant Paul Greenwood, by his undersigned counsel, Hafetz & Necheles,  
states:

Mr. Greenwood is a defendant in a criminal case in the Federal District Court for  
the Southern District of New York, *U.S. v. Greenwood*, et al., 09-mj-502 (Feb 24,  
2009)(Eaton). The criminal complaint raises factual issues substantially similar to  
plaintiff's claims in this action.

Accordingly, upon the advice of counsel, Mr. Greenwood reserves his right to  
amend his Answer and respond in substance when circumstances permit, and responds to  
the allegations in the Complaint as follows:

1. Declines to answer paragraph 1 on the ground that his answer may tend to  
incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-  
incrimination.

2. Declines to answer paragraph 2 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

3. Declines to answer paragraph 3 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

4. Declines to answer paragraph 4 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

5 (a). Avers that the allegations in paragraph 5 (a) state conclusions of law to which no responsive pleading is required. To the extent a response is required, declines to answer paragraph 5(a) on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

5(b). Avers that the allegations in paragraph 5 (b) state conclusions of law to which no responsive pleading is required. To the extent a response is required, declines to answer paragraph 5(b) on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

5(c). Avers that the allegations in paragraph 5 (c) state conclusions of law to which no responsive pleading is required. To the extent a response is required, declines to answer paragraph 5(c) on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

5(d). Avers that the allegations in paragraph 5 (d) state conclusions of law to which no responsive pleading is required. To the extent a response is required, declines to answer

paragraph 5(d) on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

6. Declines to answer paragraph 6 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

7. Avers that the allegations in paragraph 7 state conclusions of law to which no responsive pleading is required. To the extent a response is required, declines to answer paragraph 5(d) on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

8. Avers that the allegations in paragraph 8 state the relief sought by plaintiff to which no responsive pleading is required. To the extent a response is required, declines to answer paragraph 8 on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

9. Avers that the allegations in paragraph 9 state the relief sought by plaintiff to which no responsive pleading is required. To the extent a response is required, declines to answer paragraph 9 on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

10. Avers that the allegations in paragraph 10 state conclusions of law to which no responsive pleading is required. To the extent a response is required, declines to answer paragraph 10 on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

11. Avers that the allegations in paragraph 11 state conclusions of law to which no responsive pleading is required. To the extent a response is required, declines to answer

paragraph 11 on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

12. Declines to answer paragraph 12 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

13. Declines to answer paragraph 13 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

14. Declines to answer paragraph 14 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

15. Declines to answer paragraph 15 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

16. Declines to answer paragraph 16 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

17. Declines to answer paragraph 17 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

18. Declines to answer paragraph 18 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

19. Declines to answer paragraph 19 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

20. Declines to answer paragraph 20 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

21. Declines to answer paragraph 21 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

22. Declines to answer paragraph 22 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

23. Declines to answer paragraph 23 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

24. Declines to answer paragraph 24 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

25. Declines to answer paragraph 25 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

26. Declines to answer paragraph 26 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

27. Declines to answer paragraph 27 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

28. Declines to answer paragraph 28 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

29. Declines to answer paragraph 29 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

30. Declines to answer paragraph 30 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

31. Declines to answer paragraph 31 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

32. Declines to answer paragraph 32 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

33. Declines to answer paragraph 33 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

34. Declines to answer paragraph 34 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

35. Declines to answer paragraph 35 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

36. Declines to answer paragraph 36 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

37. Declines to answer paragraph 37. on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

38. Declines to answer paragraph 38 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

39. Declines to answer paragraph 39 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

40. Declines to answer paragraph 40 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

41. Declines to answer paragraph 41 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

42. Declines to answer paragraph 42 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

43. Declines to answer paragraph 43 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

44. Declines to answer paragraph 44 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

45. Declines to answer paragraph 45 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

46. Avers that the allegations in paragraph 46 state conclusions of law to which no responsive pleading is required. To the extent a response is required, declines to answer paragraph 46 on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

47. Avers that the allegations in paragraph 47 state conclusions of law to which no responsive pleading is required. To the extent a response is required, declines to answer paragraph 47 on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

48. Avers that the allegations in paragraph 48 state conclusions of law to which no responsive pleading is required. To the extent a response is required, declines to answer paragraph 48 on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

49. Avers that the allegations in paragraph 49 state conclusions of law to which no responsive pleading is required. To the extent a response is required, declines to answer paragraph 49 on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

50. Declines to answer paragraph 50 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

51. Avers that the allegations in paragraph 51 state conclusions of law to which no responsive pleading is required. To the extent a response is required, declines to answer paragraph 49 on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

52. Avers that the allegations in paragraph 52 state conclusions of law to which no responsive pleading is required. To the extent a response is required, declines to answer paragraph 52 on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

53. Avers that the allegations in paragraph 53 state conclusions of law to which no responsive pleading is required. To the extent a response is required, declines to answer paragraph 53 on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

54. Declines to answer paragraph 54 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

55. Avers that the allegations in paragraph 55 state conclusions of law to which no responsive pleading is required. To the extent a response is required, declines to answer paragraph 55 on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

56. Avers that the allegations in paragraph 56 state conclusions of law to which no responsive pleading is required. To the extent a response is required, declines to answer paragraph 56 on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

57. Avers that the allegations in paragraph 57 state conclusions of law to which no responsive pleading is required. To the extent a response is required, declines to answer paragraph 57 on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

58. Declines to answer paragraph 58 on the ground that his answer may tend to incriminate him, pursuant to this Fifth Amendment privilege against compulsory self-incrimination.

59. Avers that the allegations in paragraph 59 state conclusions of law to which no responsive pleading is required. To the extent a response is required, declines to answer paragraph 59 on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

60. Avers that the allegations in paragraph 60 state conclusions of law to which no responsive pleading is required. To the extent a response is required, declines to answer paragraph 60 on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

61. Avers that the allegations in paragraph 61 state conclusions of law to which no responsive pleading is required. To the extent a response is required, declines to answer paragraph 61 on the ground that his answer may tend to incriminate him, pursuant to his Fifth Amendment privilege against compulsory self-incrimination.

#### **AFFIRMATIVE DEFENSE**

The SEC's claims are barred in whole or in part by the applicable statutes of limitations and/or by the doctrine of laches.

Dated: New York, New York  
March 26, 2009

HAFETZ & NECHELES

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/s/

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