

ADMINISTRATIVE PROCEEDING

BEFORE THE

SECURITIES COMMISSIONER OF SOUTH CAROLINA

IN THE MATTER OF:)

)

[² Asset Management LLC and _____))

AMENDED ORDER TO
CEASE AND DESIST.

Respondents.)

WHEREAS, the Securities Division of the Office of the Attorney General of the State of

chief control person of Respondent G² Asset Management.

III. FINDINGS OF FACT

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In or around early 2010, the Defendants approached a South Carolina resident (the

[REDACTED]

15. Contrary to the Respondents' representations, the Respondents' trades did not produce an annual return of ten to twelve percent (10-12%) for the Investor; indeed, the Investor did not receive any profits at all.
16. Contrary to the Respondents' representations, the Investor has not received any return of principal from the Respondents to date.
17. Respondent Guzman represented Respondent G² Asset Management in effecting the above advisory services.
18. At no time relevant to the events stated herein was Respondent G² Asset Management registered with the Division as an investment adviser, and no exemption from registration has been claimed by Respondent G² Asset Management

24. Pursuant to S.C. Code Ann. § 35-1-403(a), it is unlawful for an individual to transact business in this State as an investment adviser unless the person is registered as an investment adviser or is exempt from registration

25. Pursuant to S.C. Code Ann. § 35-1-404(a), it is unlawful for an individual to transact business in this State as an investment adviser representative unless the person is

or no loss) as a result of the advice that will be rendered constitutes dishonest and unethical conduct.

34. The Respondents' guaranteeing profits, guaranteeing no loss of the Investor's investment, and fabricating financial documents constitute dishonest and unethical conduct in violation of S.C. Code Regs. § 13-502.

35. It is in the public interest for the protection of investors and consistent with the purposes

above-enumerated practices, which constitute violations of the Act, and pay an

operated, or indirectly or directly controlled by or on behalf of G² Asset Management, LLC are **PERMANENTLY BARRED** from participating in any aspect of the securities industry in or from the State of South Carolina beginning on the date of execution of this order; and

- f. Respondent Gustavo Guzman is **PERMANENTLY BARRED** from participating in any aspect of the securities industry in or from the State of South Carolina beginning on the date of execution of this order.

IT IS FURTHER ORDERED that, pursuant to S.C. Code Ann. §§ 35-1-604(a)(2) and

(b) ~~respondents from registration with the Division upon which the Respondents may claim~~

This Order does not prevent the Division or any other agency, including, without
limit,

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Handwritten signature

January 2019

ALAN WILSON
SECURITIES COMMISSIONER

Handwritten signature
TRACY A. MEYERS
Deputy Securities Commissioner

Handwritten signature

STATE OF SOUTH CAROLINA
OFFICE OF THE ATTORNEY GENERAL

AFFIDAVIT OF COMPLIANCE

and dated August 22, 2016, by filing the original of said document with the Office of the Commissioner of the State of South Carolina and by placing a copy of said document in the United States mail, certified mail

entity is in compliance with

Section 5-1-611, Code of Laws of South Carolina.

[Handwritten Signature]

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