ADMINISTRATIVE PROCEEDING

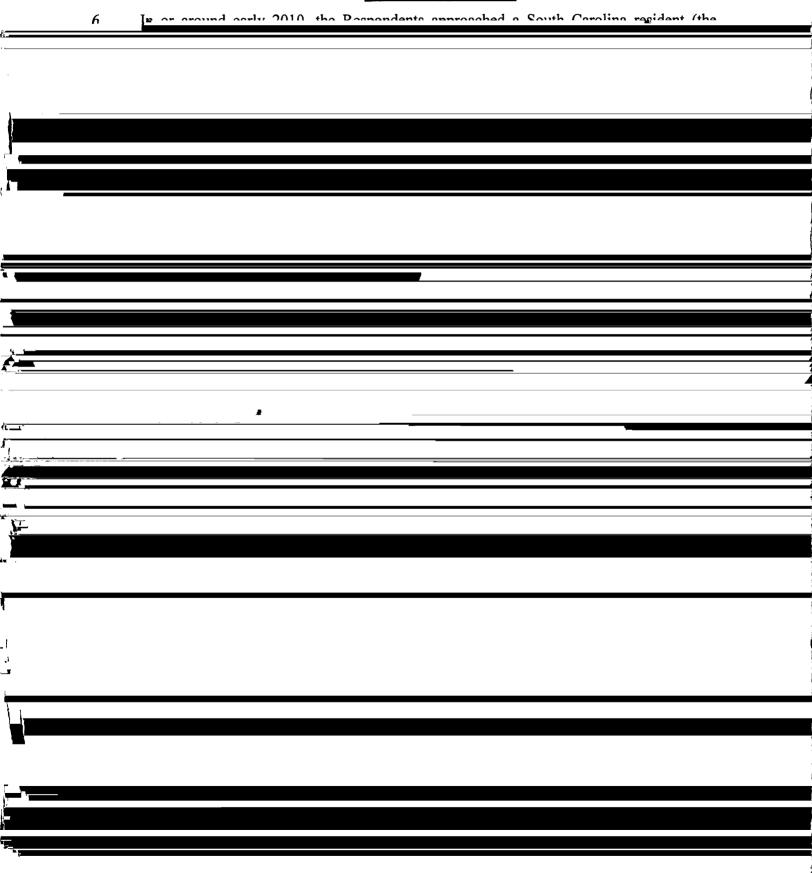
BEFORE THE

SECURITIES COMMISSIONER OF SOUTH CAROLINA

Respondents. WINEDE AS the Securities Division of the Office of the Atternational of the State of		IN THE MATTER OF:)	AMENDED ORDER TO	
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chief control person of Respondent G² Asset Management.

III. FINDINGS OF FACT



	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 G ² Asset Management in effecting the
<u> </u>		above advisory services.
	18.	At no time relevant to the events stated herein was Respondent G ² Asset Management
		registered with the Division as an investment adviser, and no exemption from registration
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	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
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	25.	Pursuant to S.C. Code Ann. § 35-1-404(a), it is unlawful for an individual to transact
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unethical conduct. The Respondents' guaranteeing profits, guaranteeing no loss of the Investor's investment, 34. and fabricating financial documents constitute dishonest and unethical conduct in violation of S.C. Code Regs. § 13-502. It is in the nublic interest for the protection of investors, and consistent with the nurnoses

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

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

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 my significan with the Division was which the Dognandante more claim

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