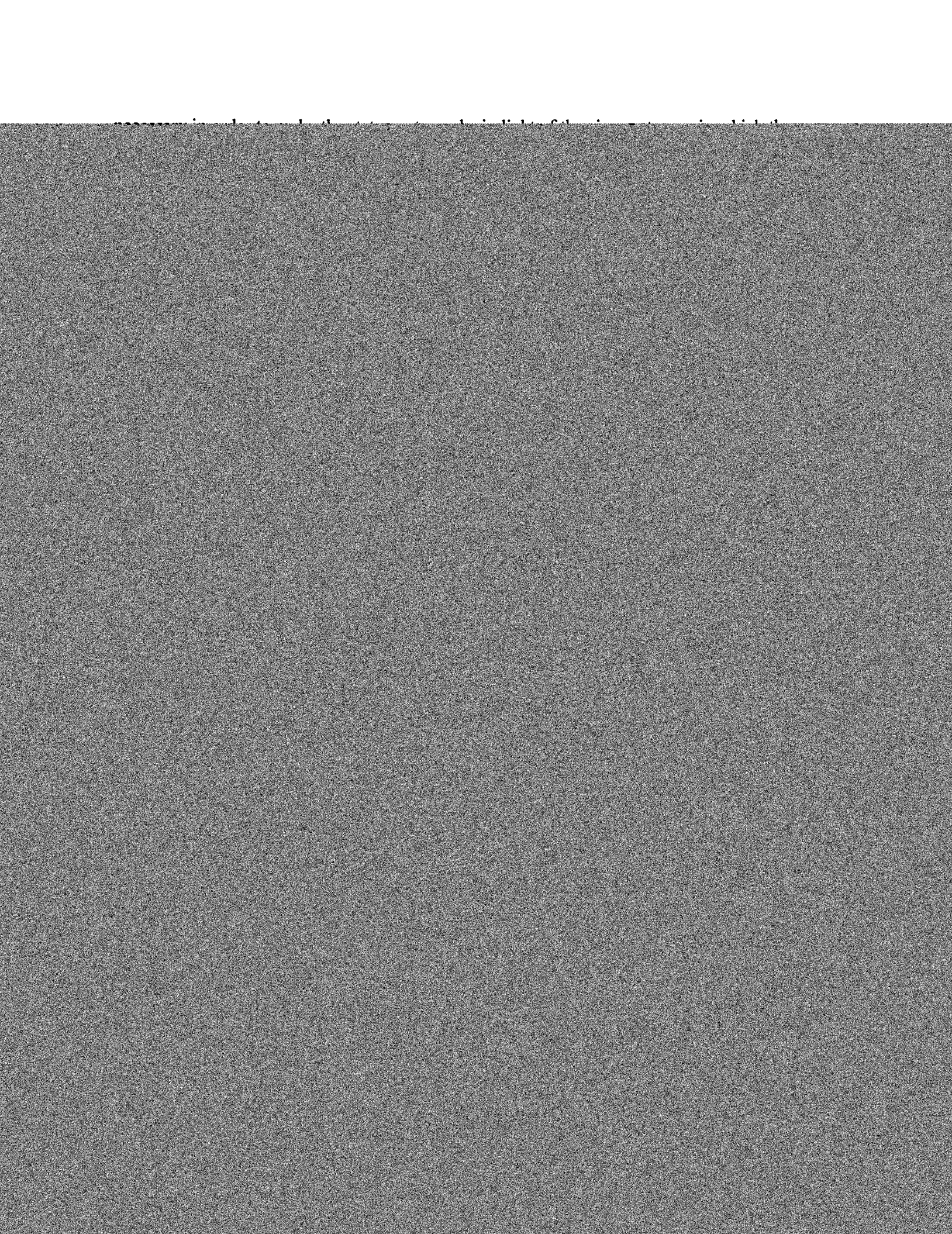


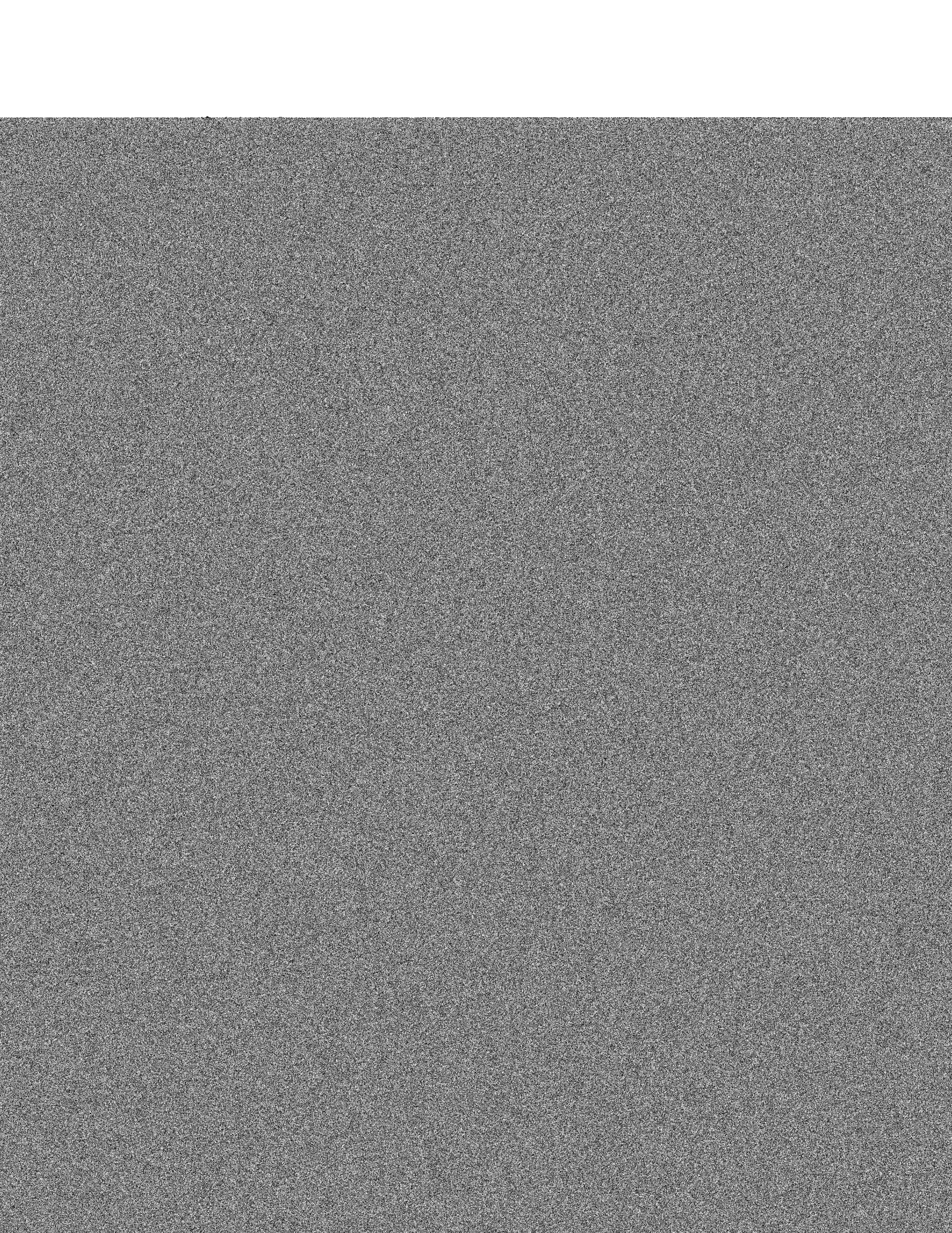
II. RESPONDENTS

2. James Shepard is a California resident with a last known address of 1414 Harbour Way South Suite 1400, Richmond, California 94804.

3. Vetrizzo was a Delaware limited liability company with a last known address of







shall result in this Order, including the stated civil penalty and any assessed costs, becoming final as to that Respondent by operation of law.

This Order does not prevent the Division or any other law enforcement agency from seeking such other civil or criminal remedies that are available under the Act, including remedies related to offers or sales of securities by the Respondent above.


CONTINUING TO ENGAGE IN ACTS PROHIBITED BY THIS ORDER
SIMILAR ACTS MAY RESULT IN THE DIVISION'S FILING ADDITIONAL ACTIONS
AND/OR SEEKING FURTHER CIVIL REMEDIES AVAILABLE UNDER THE ACT
OR ORDER COULD RESULT IN CRIMINAL PENALTIES PURSUANT TO S.C. CODE
35-1-508.

ENTERED, this the 24th day of February, 2014.

ALAN WILSON
SECURITIES COMMISSIONER

By: Tracy Meyers
TRACY A. MEYERS
Deputy Securities Commissioner

ISSUANCE REQUESTED BY:


IAN P. WELCH
Assistant Attorney General
Securities Division
Rembert C. Dennis Building
1000 Assembly Street
Columbia, S. C. 29201

