

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**INVESTMENT ADVISERS ACT OF 1940**  
**Release No. 2428 / September 14, 2005**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-12039**

**In the Matter of**  
  
**MARVIN I. FRIEDMAN,**  
  
**Respondent.**

**ORDER INSTITUTING**  
**ADMINISTRATIVE PROCEEDINGS**  
**PURSUANT TO SECTION 203(f) OF THE**  
**INVESTMENT ADVISERS ACT OF 1940,**  
**MAKING FINDINGS, AND IMPOSING**  
**REMEDIAL SANCTIONS**

**I.**

The Securities and Exchange Commission (“Commission”) deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted pursuant to Section 203(f) of the Investment Advisers Act of 1940 (“Advisers Act”) against Marvin I. Friedman (“Respondent”).

**II.**

In anticipation of the institution of these proceedings, Respondent has submitted an Offer of Settlement (the “Offer”) which the Commission has determined to accept. Solely for the purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, and without admitting or denying the findings herein, except as to the Commission’s jurisdiction over him and the subject matter of these proceedings, and the findings contained in Section III.2 below, which are admitted, Respondent consents to the entry of this Order Instituting Administrative Proceedings Pursuant to Section 203(f) of the Investment Advisers Act of 1940, Making Findings, and Imposing Remedial Sanctions (“Order”), as set forth below.

**III.**

On the basis of this Order and Respondent’s Offer, the Commission finds that:

1. Friedman was a Managing Member of L.F. Global Investments, LLC (“LF Global”) and participated in the control of both LF Global and Global Money Management, L.P. (“GMM”). GMM was a California limited partnership located in San Diego, California, holding itself out as a private hedge fund. GMM was not registered with the Commission in any capacity. LF Global was a California limited liability company located in San Diego, California. It was the

general partner and investment adviser of GMM. Friedman, 65, resided in San Diego, California while managing LF Global and GMM, and now resides in Arizona.

2. On September 6, 2005, a final judgment was entered by consent against Friedman, permanently enjoining him from future violations of Section 17(a) of the Securities Act of 1933, Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5 thereunder, and Sections 206(1) and 206(2) of the Advisers Act, in the civil action entitled Securities and Exchange Commission v. Global Money Management, L.P., et al., Civil Action Number 04 CV 00521 BTM (WMC), in the United States District Court for the Southern District of California.

3. The Commission's complaint alleged the following: that Friedman sold, in an unregistered offering from 1993 to March 2004, limited partnership interests in GMM, a purported private hedge fund that claimed to invest in securities, such as stock and stock options; that Friedman misrepresented to investors that the hedge fund held assets ranging from \$60 million to over \$100 million; from at least December 2002 to March 2004, however, the securities GMM held were worth no more than \$11 million; and that Friedman touted his investment experience but did not tell investors about his disciplinary history, including that he had been barred from association with any member of the NASD.

#### IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanctions agreed to in Respondent Friedman's Offer.

Accordingly, it is hereby ORDERED:

Pursuant to Section 203(f) of the Advisers Act, that Respondent Friedman be, and hereby is barred from association with any investment adviser;

Any reapplication for association by the Respondent will be subject to the applicable laws and regulations governing the reentry process, and reentry may be conditioned upon a number of factors, including, but not limited to, the satisfaction of any or all of the following: (a) any disgorgement ordered against the Respondent, whether or not the Commission has fully or partially waived payment of such disgorgement; (b) any arbitration award related to the conduct that served as the basis for the Commission order; (c) any self-regulatory organization arbitration award to a customer, whether or not related to the conduct that served as the basis for the Commission order; and (d) any restitution order by a self-regulatory organization, whether or not related to the conduct that served as the basis for the Commission order.

By the Commission.

Jonathan G. Katz  
Secretary