UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 85473 / March 29, 2019

ADMINISTRATIVE PROCEEDING
File No. 3-14893

In the Matter of **QUANTEK ASSET MANAGEMENT, LLC, BULLTICK CAPITAL MARKETS HOLDINGS, LP, JAVIER GUERRA, and RALPH PATINO ,** **Respondents.**	**NOTICE OF PROPOSED PLAN OF DISTRIBUTION AND OPPORTUNITY FOR COMMENT**

Notice is hereby given, pursuant to Rule 1103 of the United States Securities and Exchange Commission's ("Commission") Rules on Fair Fund and Disgorgement Plans, 17 C.F.R. § 201.1103, that the Division of Enforcement has submitted to the Commission a proposed plan of distribution (the "Plan") for the monies paid in the above-captioned matter.

On May 29, 2012, the Commission issued a settled Order Instituting Administrative and Cease-and-Desist Proceedings Pursuant to Section 8A of the Securities Act of 1933, Sections 203(e), 203(f), and 203(k) of the Investment Advisers Act of 1940, and Section 9(b) of the Investment Company Act of 1940, Making Findings, and Imposing Remedial Sanctions and Cease-and-Desist Orders ("Order") [1] against Quantek Asset Management, LLC ("Quantek"), Bulltick Capital Markets Holdings, LP ("Bulltick"), Javier Guerra ("Guerra"), and Ralph Patino ("Patino") (collectively, the "Respondents"). The Commission found that, from 2006 through 2008, Quantek, a Latin American-focused hedge fund adviser, misled investors about three important attributes of funds that it managed: (1) whether management had "skin in the game"; (2) the funds' investment process; and (3) certain related-party transactions.

As a result of the conduct described in the Order, the Commission ordered Quantek and Guerra to jointly and severally disgorge $2,056,446, and pay prejudgment interest in the amount of $219,585. The Commission also ordered that Quantek pay a civil money penalty of $375,000; Bulltick pay a civil money penalty of $300,000; Guerra pay a civil money penalty of $150,000; and Patino pay a $50,000 civil money penalty. The Commission also ordered that a Fair Fund (the "Fair Fund") be created, pursuant to Section 308(a) of the Sarbanes-Oxley Act of 2002 for the disgorgement, interest, and penalties paid by the Respondents. The Respondents made the

[1] Securities Act Rel. No. 9326 (May 29, 2012).

payments as required by the Order, with the exception of Patino, who has an outstanding balance of $58.33.

The Fair Fund is subject to the continuing jurisdiction and control of the Commission and has been deposited at the United States Department of the Treasury's Bureau of the Fiscal Service for investment.

OPPORTUNITY FOR COMMENT

Pursuant to this Notice, all interested persons are advised that they may obtain a copy of the Plan from the Commission's public website at http://www.sec.gov/litigation/fairfundlist.htm. Interested persons may also obtain a written copy of the Plan by submitting a written request to Keshia W. Ellis, Esq., United States Securities and Exchange Commission, 100 F Street, NE, Washington, DC 20549-5876. All persons who desire to comment on the Plan may submit their comments, in writing, no later than (30) days from the date of this Notice:

1. to the Office of the Secretary, United States Securities and Exchange Commission, 100 F Street, NE, Washington, DC 20549-1090;

2. by using the Commission's Internet comment form (http://www.sec.gov/litigation/admin.shtml); or

3. by sending an e-mail to rule-comments@sec.gov.

Comments submitted should include "Administrative Proceeding File No. 3-14893" in the subject line. Comments received will be publicly available. Persons should submit only information they wish to make publicly available.

THE PLAN

The Fair Fund is comprised of the $3,151,031.00 in disgorgement, prejudgment interest, and civil money penalties paid by the Respondents plus accumulated interest and earnings thereon. The Plan proposes to transfer the funds to the United States Treasury and terminate the Fair Fund. Within (30) calendar days of Commission approval of the Distribution Plan, the funds will be paid to the general fund of the United States Treasury, subject to Exchange Act Section 21F(g)(3).

By the Commission.

Vanessa A. Countryman
Acting Secretary