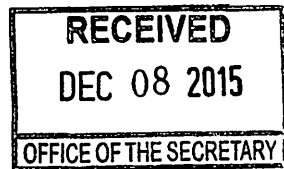


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UNITED STATES OF AMERICA
before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
FILE NO. 3-16946

In the Matter of

GEORGE CHARLES CODY PRICE,

Respondent.

RESPONDENT GEORGE CHARLES
CODY PRICE'S ANSWER TO
ORDER INSTITUTING
ADMINISTRATIVE PROCEEDING

ANSWER TO ORDER INITIATING ADMINISTRATIVE PROCEEDING

Respondent George Charles Cody Price ("PRICE") in answer to the Order Instituting Administrative Proceedings ("OIP") respectfully states as follows:

A. RESPONDENT.

1. Admits the allegations in paragraph 1, that he (Price) was the sole, owner, manager and president and CEO of ABS Manager, LLC, that he is not registered with the Commission, but has a CRD number, that he is 37 years of age, and that he resides in La Jolla, CA. Respondent further states he is without sufficient knowledge or information to form a belief as to the allegation in paragraph 1 that ABS Manager, LLC "managed three unregistered investment funds."

B. ENTRY OF THE INJUNCTION.

2. Admits the allegation in paragraph 2.

3. Admits the allegation in paragraph 3, with the caveat that the consent decree referenced in paragraph 2 was entered into by Respondent *without admitting or denying* the allegations in the Commission's complaint, the various contentions therein which were objected to by Respondent at various instances in the underlying proceeding presided over by Judge Gonzolo P. Curiel.

4. Respondent generally denies the allegations contained in the Commission's complaint for purposes of this Answer.

C. VIOLATIONS.

5. Assuming, without admitting, the above allegations discussed in paragraph 3, which reference some of the allegations contained in the Commission's complaint, these matters were not

material to the investors of any of the funds managed by Respondent's company, ABS Manager, LLC, nor would any investor in any of these funds would have considered them material or significant in terms of the total sum of information available ABS Manager, LLC regarding any of the funds which it managed.

D. AFFIRMATIVE DEFENSES.

6. Respondent states that, as he is without sufficient knowledge or information to form a belief as to the allegations contained in paragraph 1 or 3 of the Commission's OIP, that he is therefore without sufficient knowledge or information to know which (if any) affirmative defenses may apply and therefore, states that consistent with the reservation of rights, Respondent reserves the right to add any affirmative defenses which may apply

E. RESERVATIONS.

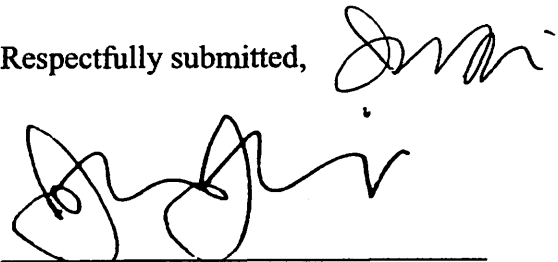
7. Respondent reserves the right to supplement and amend this Answer as necessary and appropriate.

8. To the extent any allegation is not specifically addressed herein, such allegation is denied.

9. Respondent demands strict proof of all allegations, and the underlying facts, as made in the OIP.

DATED: December 7, 2015

Respectfully submitted,



John E. Dolkart, Jr., Esq. (702) 275-2181 1750
Kettner Blvd, Suite 416 San Diego, CA 92101
COUNSEL FOR RESPONDENT GEORGE
CHARLES CODY PRICE

In the Matter of George Charles Cody Price
Administrative Proceeding File No. 3-16946

Service List

Pursuant to Commission Rule of Practice 151(17 C.F.R. § 201.151), I certify that the attached:

ANSWER TO THE OIP BY RESPONDENT GEOREGE CHARLES CODY PRICE

On December 7, 2015.

By: Facsimile and Overnight Mail

Brent J. Fields, Secretary
Securities and Exchange Commission
100 F. Street, N.E., Mail Stop 1090
Washington, DC 20549-1090
Facsimile: (202) 772-9324
(Original and three copies)

By: Email


Honorable Brenda P. Murray
Administrative Law Judge
Securities and Exchange Commission
100 F Street, N.E., Mail Stop 2557
Washington, DC 20549-2557
Email: alj@sec.gov

By: Email and U.S. Mail

Lynn M. Dean, Esq.
Division of Enforcement, Los Angeles Regional Office Securities and Exchange Commission
444 S. Flower Street, Suite 900
Los Angeles, California 90071-9591
Email: deanl@sec.gov

DATED: December 7, 2015

BY:



John E. Dolkart, Jr., Esq.

