

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

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 94658 / April 8, 2022**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-20814**

**In the Matter of**

**John William Gunn,**

**Respondent.**

**ORDER INSTITUTING**  
**ADMINISTRATIVE PROCEEDINGS**  
**PURSUANT TO SECTION 15(b) OF THE**  
**SECURITIES EXCHANGE ACT OF 1934,**  
**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 15(b) of the Securities Exchange Act of 1934 (“Exchange Act”) John William Gunn (“Gunn” or “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 paragraph III.3., below, which are admitted which are admitted, Respondent consents to the entry of this Order Instituting Administrative Proceedings Pursuant to Section 15(b) of the Securities and Exchange Act of 1934, 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. Gunn age 50, is a citizen of the United Kingdom and resides in Hong Kong. Gunn is the founder, chairman, compliance officer and principal of Global Investment Strategy UK Ltd. ("GIS"), and he is not registered in the United States, or associated with any registered entity in the United States.

2. GIS is a financial services firm registered with and regulated by the Financial Conduct Authority of the United Kingdom, and is a member of the London Stock Exchange. Its principal place of business is in London, England. GIS has never been registered as, or associated with, a registered broker-dealer in the United States, and does not qualify for an exemption to the broker-dealer registration requirements.

3. On March 22, 2022, a final judgment was entered by consent against Gunn, permanently enjoining him from future violations of Section 15(a) of the Exchange Act in the civil action entitled Securities and Exchange Commission v. Global Investment Strategy UK Ltd., et al., Civil Action Number 1:20-CV-10838, in the United States District Court for the Southern District of New York.

4. The Commission's complaint alleged that, from at least 2015 through 2019, GIS acted as a broker by effecting and inducing securities transactions in the United States for the accounts of others, in violation of Section 15(a) of the Exchange Act, 15 U.S.C. § 780(a). The complaint further alleged that Gunn provided substantial assistance to GIS's violations and, accordingly, aided and abetted GIS's violations.

### **Undertakings**

5. Respondent undertakes to provide to the Commission, within 30 days after the end of the 12-month suspension period described below, an affidavit that he has complied fully with the sanctions described in Section IV below.

### **IV.**

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

Accordingly, it is hereby ORDERED pursuant to Section 15(b)(6) of the Exchange Act, that:

A. Respondent Gunn be, and hereby is:

suspended from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization; and

suspended from participating in any offering of a penny stock, including: acting as a promoter, finder, consultant, agent or other person who engages in activities with a broker, dealer or issuer for purposes of the issuance or trading in any penny stock, or inducing or attempting to induce the purchase or sale of any penny stock,

for a period of twelve months, effective immediately upon the entry of this Order.

B. Respondent shall comply with the undertakings enumerated in Section III.5., above.

By the Commission.

Vanessa A. Countryman  
Secretary