

2. Respondent BellaRock Capital Management, Inc. is a South Carolina corporation

registered with the South Carolina Secretary of State with an address of Post Office Box
630, Clemson, South Carolina 29633.

6. During the years 2008 and 2009, Respondents took in approximately two hundred and fifty thousand dollars (\$250,000) from at least five investors in exchange for ownership shares in a pooled stock fund to be traded by the Respondents.
7. Respondent Jones was at all times herein in control of Respondent BellaRock Capital Management, Inc.
8. The shares sold to the five investors by Respondents constitute securities as defined by the Act.
9. Respondents are not registered to sell securities in South Carolina in accordance with the Act.
10. The ownership shares sold by Respondents are not registered or notice filed with the Division, and are not otherwise exempt from registration under the Act.
11. The sale of securities by Respondents took place in Clemson, South Carolina.
12. Respondent Jones represented to the investors that the money invested in Respondent BellaRock Capital Management, Inc.'s stock pool would be invested in equities through Tradestation Securities, a registered broker-dealer located in Plantation, Florida.

and provided investment advice in and from South Carolina; and

WHEREAS, Respondents BellaRock Capital Management, Inc. and Jones are not registered as investment advisors or investment advisor representatives in South Carolina or

WHEREAS, respondents, as described above, acted as broker-dealer agents by offering

and selling securities in and from South Carolina; and

Code Ann. §§ 35-1-501, 35-1-402(a) and (d), and 35-1-501; and

WHEREAS, after due deliberation, the Division finds that it is necessary and appropriate, in the public interest, for the protection of investors, and consistent with the purposes fairly intended by the policy and provisions of the Act to issue the following Order:

CEASE AND DESIST ORDER

NOW THEREFORE, pursuant to S.C. Code Ann. § 35-1-604(a)(1), IT IS HEREBY ORDERED that Respondents and every successor, affiliate, control person, agent, servant, and employee of Respondents, and every entity owned, operated, or indirectly or directly controlled

Respondent states that the Respondent is without knowledge of information contained in this document.

belief as to the truth of an allegation, he shall so state.

Failure of a Respondent to file a written request for a hearing in this matter within the thirty (30) day period stated above shall be deemed a waiver by that Respondent of his right to such a hearing. Failure of a Respondent to file an Answer, including a request for a hearing,

