the promoters regarding their use of investor funds; and the risk of use of investor funds in a manner other than what was represented to the investor.

WHEREAS, Respondents solicited and sold investments which constitute "securities," pursuant to S.C. Code Ann. § 35-1-102(29), and did so in this State, as that term is defined by S.C. Code Ann. § 35-1-610(c); and

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