

ADMINISTRATIVE PROCEEDING

BEFORE THE

SECURITIES COMMISSIONER OF SOUTH CAROLINA

IN THE MATTER OF:)
)
Jonathan Turecki and Palmetto)
Pub Company, LLC,)
)
)
Respondents.)

ORDER TO CEASE AND DESIST

File No. 15065

WHEREAS, the Securities Division of the Office of the Attorney General of the State of

South Carolina (the "Division") has been authorized and directed by the Securities
Commissioner of South Carolina (the "Securities Commissioner") to administer the provisions of

II. RESPONDENTS

Avenue, North Myrtle Beach, South Carolina 29582.

Agreement, the Respondents stated that Investor A's investment would be used solely for the business expenses of the Respondents.

the business expenses of the Respondents.

21. Contrary to the Respondents' representations, Investor B did not receive a twenty-five percent (25%) return on his investment.
22. Contrary to the Respondents' representations, the Respondents did not repay Investor B on January 15, 2014.
23. Contrary to the Respondents' representations, Investor B's investment was used for the personal expenses of the Respondents.
24. Respondent Turecki represented Respondent Palmetto Pub in effecting the above transactions in securities.
25. At no time relevant to the events stated herein was Respondent Turecki registered with the Division as an agent, and no exemption from registration has been claimed by Respondent Turecki.
26. At no time relevant to the events stated herein were the securities at issue registered with the Division or federal covered securities, and no exemption from registration has been claimed by the Respondents.

IV. CONCLUSIONS OF LAW

27 The South Carolina Uniform Securities Act of 2005, S.C. Code Ann. § 25-1-101, et seq.

proposes to issue a security.

31. Pursuant to S.C. Code Ann. § 35-1-402(a), an "agent" includes an individual other than

an issuer, who represents an issuer in effecting or attempting to effect purchases or sales of securities.

32. Pursuant to S.C. Code Ann. § 35-1-402(a), it is unlawful for an individual to transact business in this State as an agent unless that individual is registered or exempt from

unregistered agent who transacted business on behalf of Palmetto Pub while that agent was not registered.

38. The Respondents, on at least two occasions and in connection with the offer, sale, or purchase of a security, directly or indirectly (1) employed a device, scheme, or artifice to defraud; (2) made an untrue statement of a material fact or omitted to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading; or (3) engaged in an act, practice, or course of

thereof;

- c. Respondent Palmetto Pub Company, LLC pay a civil penalty in the amount of thirty thousand dollars (\$30,000) if this Order becomes effective by operation of law, or, if

penalty in an amount not to exceed \$10,000 for each violation of the Act by Palmetto Pub

and the actual cost of investigation or proceeding; and

In the written answer, the Respondent, in addition to requesting a hearing, shall admit or deny the factual allegations and, if it does, shall set forth specific facts on which the Respondent relies, and shall set forth concisely

the reasons therefor. If the Respondent admits the allegations, it shall also state the reasons therefor. If the Respondent denies the allegations, it shall state the reasons therefor.

Within 10 days of the date of the written answer, the Respondent shall file with the Commission a copy of the written answer and a copy of the reasons therefor.

The Commission may, at its discretion, require the Respondent to file a copy of the written answer and a copy of the reasons therefor with the Commission.

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BY: _____

10/1/2018

KEVIN WILSON
SECURITIES COMMISSIONER

BY: 
TRACY WILLIAMS
SECURITIES COMMISSIONER

10/1/2018

10/1/2018

CERTIFICATE OF SERVICE AND AFFIDAVIT OF COMPLIANCE

FILE NUMBER 13003

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FILE NUMBER 13003

South Carolina

Mailed January 28, 2016 from Columbia, South Carolina

service of process

FILE NUMBER 13003

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AMERICAN UNIVERSITY
SCHOOL OF INTERNATIONAL AFFAIRS
WASHINGTON, D.C.

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Washington, D.C. 20002

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The American University School of International Affairs is pleased to announce the appointment of a new Director of the Center for Global Health and Human Rights. The position is a full-time, senior-level position and will report to the Dean of the School of International Affairs. The successful candidate will be responsible for the overall management and development of the Center, including the recruitment and supervision of staff, the development of the Center's budget, and the oversight of the Center's programs and activities. The Center's primary focus will be on the promotion and protection of human rights and the health of vulnerable populations in developing countries. The Center will also be responsible for the coordination of the School's efforts in the area of human rights and health.

Interested candidates should send their curriculum vitae, a letter of interest, and three references to the following address:

Director
Center for Global Health and Human Rights
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Washington, D.C. 20002

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