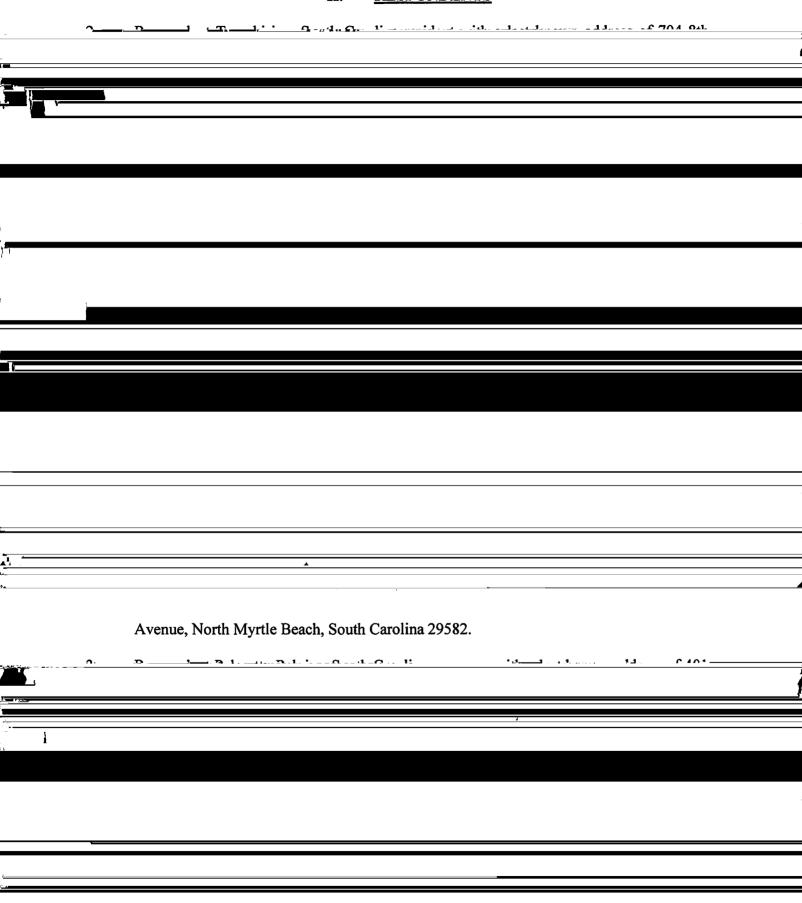
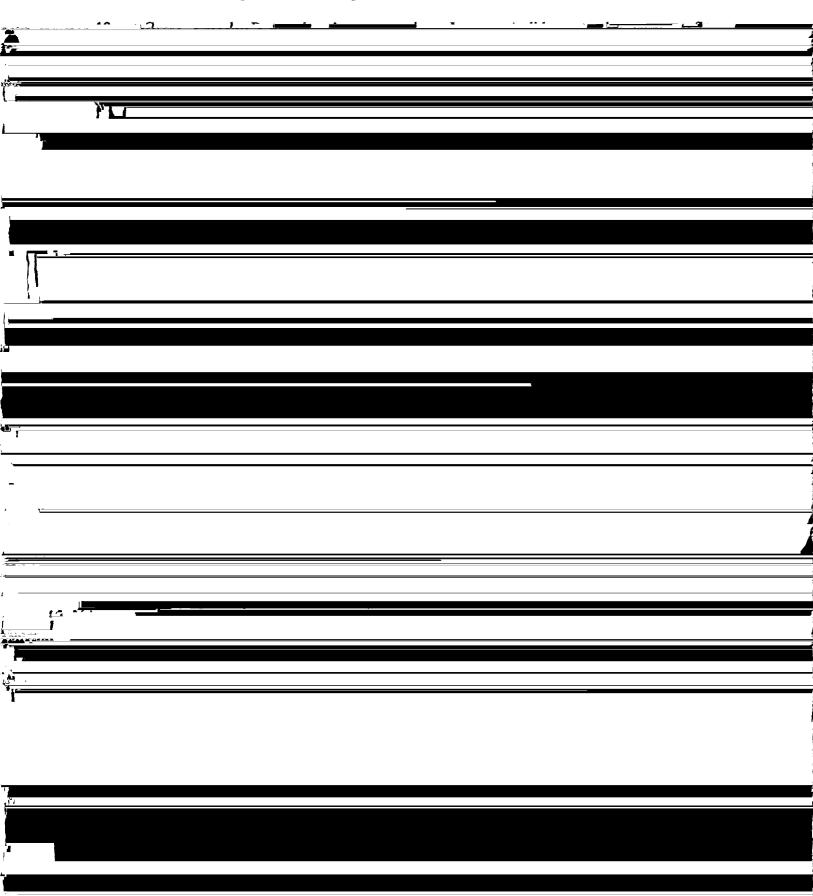
## ADMINISTRATIVE PROCEEDING

SECURITIES COMMISSION	ONER OF SOUTH CAROLINA
IN THE MATTER OF:  Jonathan Turecki and Palmetto Pub Company, LLC,  Respondents.	ORDER TO CEASE AND DESIST File No. 15065
<u>WHEREAS</u> . the Securities Division o	f the Office of the Attorney General of the State of
	en authorized and directed by the Securities
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# II. <u>RESPONDENTS</u>

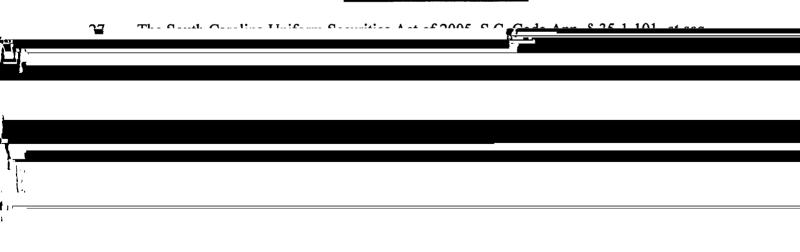


Agreement, the Respondents stated that Investor A's investment would be used solely for the business expenses of the Respondents.



- 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.

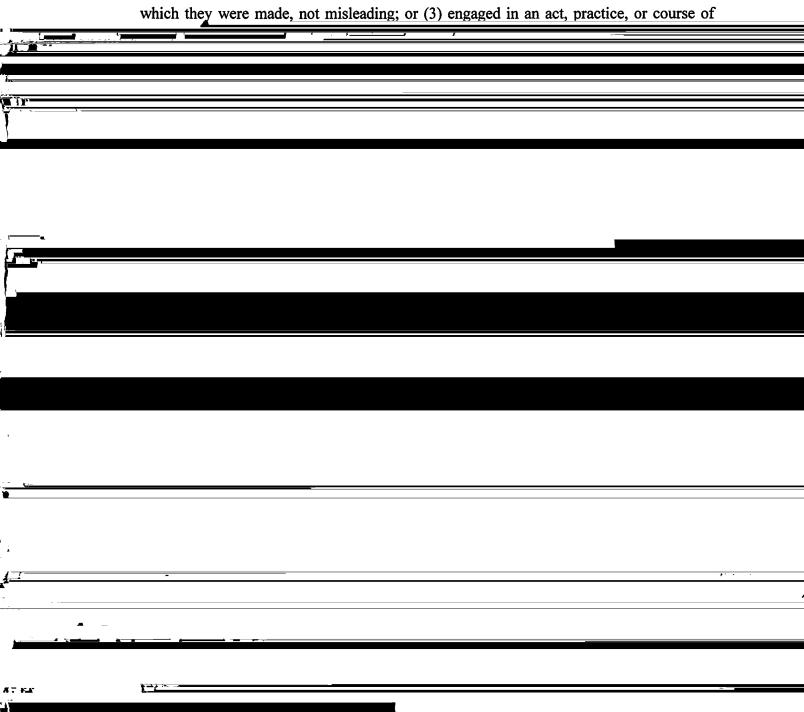
### IV. CONCLUSIONS OF LAW



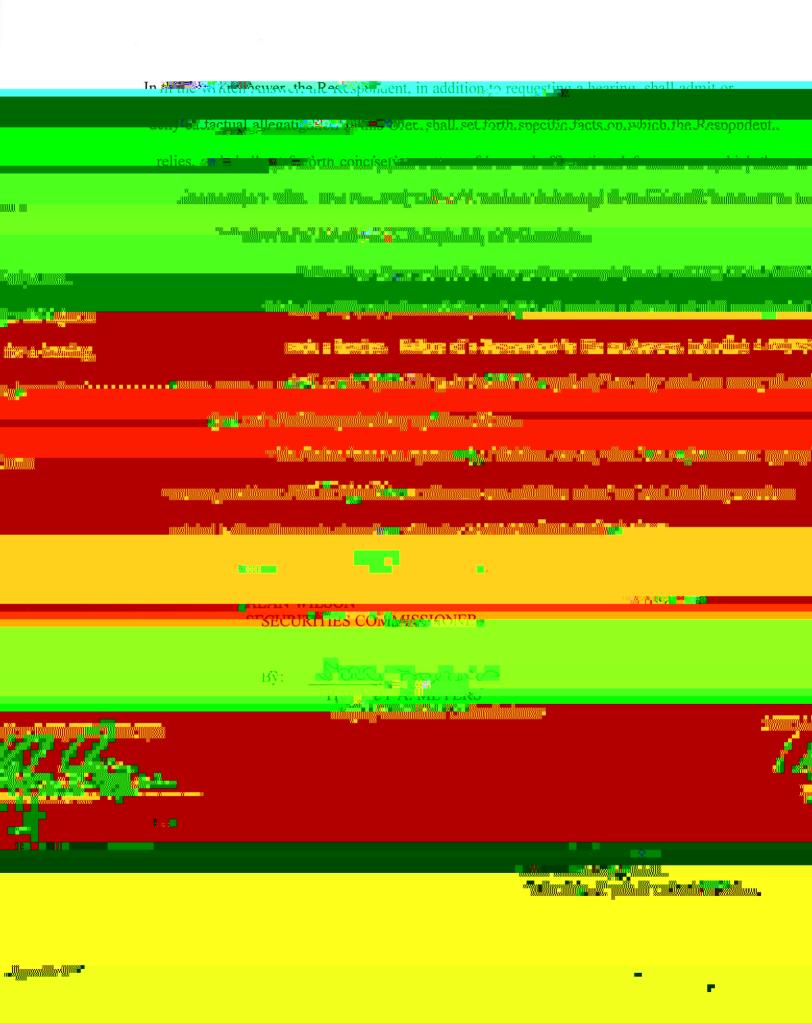
proposes to issue a security. Dimensione to S.C. Carla Ama 125 1 1 1222 on "cocont" includes on individual other than an issuer, who represents an issuer in effecting or attempting to effect purchases or sales of securities. Pursuant to S.C. Code Ann. § 35-1-402(a), it is unlawful for an individual to transact 32.

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
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<u>;</u>	penalty in an amount not to exceed \$10.000 for each violation of the Act by Palmetto Pub
	penalty in an amount not to exceed \$10.000 for each violation of the Act by Palmetto Pub
<u>;</u>	penalty in an amount not to exceed \$10.000 for each violation of the Act by Palmetto Pub
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<u> </u>	and the actual cost of investigation or proceeding; and
	and the actual cost of investigation or proceeding; and
<u> </u>	and the actual cost of investigation or proceeding; and





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