



**III. FINDINGS OF FACT**

5. At all times relevant to this Order, Respondent Crowder was the president, chair, registered agent, and chief control person of Respondent Redworc.
6. In early 2016, Respondent Crowder began soliciting an employee of a Rock Hill branch of a financial institution to purchase a bond issued by the Respondents and in the name of Respondent Redworc (the "Redworc Bond").
7. Respondent Crowder continued making such solicitations until at least May 1, 2016.

placement memorandum dated December 31, 2015 and containing certain misrepresentations of material fact, including, but not limited to, the following:

... that ... has been claimed by ...

... the ... of ... and ...

Ann. § 35-1-301.

22. Respondent Crowder, on at least one occasion, transacted business in this State as an unregistered agent in violation of S.C. Code Ann. § 35-1-402

23. Respondent Redworc, on at least one occasion, employed or associated with an unregistered agent who transacted business on behalf of Respondent Redworc while that agent was not registered in violation of S.C. Code Ann. § 35-1-402.

24. The Respondents, on at least one occasion and in connection with the offer 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 business that operated or

thousand dollars (\$30,000) if this Order becomes effective by operation of law, or, if Redworc seeks a hearing and any legal authority resolves this matter, pay a civil penalty in an amount not to exceed \$10,000 for each violation of the Act by Redworc and the actual cost of investigation or proceeding.

Respondent Robert L. Crowder Jr. pay a civil penalty in the amount of thirty thousand

dollars (\$30,000) if this Order becomes effective by operation of law, or, if Crowder seeks a hearing and any legal authority resolves this matter, pay a civil penalty in an

amount not to exceed \$10,000 for each violation of the Act by Crowder, and the actual

a record from the Respondent, will schedule a hearing for that Respondent.

In the written Answer, the Respondent, in addition to requesting a hearing, shall admit or deny each factual allegation in this Order, shall set forth specific facts on which the Respondent relies, and shall set forth concisely the matters of law and affirmative defenses upon which the Respondent relies. If the Respondent is without knowledge or information sufficient to form a belief as to the truth of an allegation, he shall so state.

Failure by a Respondent to file a written request for a hearing in this matter within the

of the Respondent of the right

such a hearing. Failure of a Respondent to file an Answer, including a request for a hearing, shall result in this Order, including the stated civil penalty and any assessed costs, becoming final as to that Respondent by operation of law.

This Order does not prevent the Division, or any other agency, including, without limitation, civil and criminal law enforcement agency from seeking additional civil or criminal remedies as are available under the Act, including remedies related to the offers and sales of

STATE OF SOUTH CAROLINA  
OFFICE OF THE COMPTROLLER OF PUBLIC ACCOUNTS

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... by placing a copy of said document in the hands of the Commissioner of the State of South Carolina and by placing a copy of said document in the hands of the

state prepaid and addressed to:

Robert L. Crowder, Jr.  
2110 East Park Drive, Suite 205

...

... via, SC 29211-1349

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