and Crossroads Investments, LLC (individually, "Holtzman," "Kadee," and "Crossroads," respectively; collectively, the "Respondents"); and

WHEREAS, in connection with that investigation, the Division determined that certain acts of the Respondents constituted violations of the Act, and on or about July 9, 2018, issued an

Order to Cease and Desist agamst the Respondents for the aneged violations (the Cease and Desist Order"); and

WHEREAS, Holtzman is the managing member of both Kadee and Crossroads, and he has authority to act on behalf of Kadee and Crossroads, as well as on his own behalf; and

WHEREAS, Holtzman acknowledges having been served with the Cease and Dismiss Order in this action and admits the Securities Commissioner's jurisdiction over him and the subject

matter of this Order, and

	ten (10) calendar days after the date of execution of this Order, figurdate Radee, LLC and pay the
	investor referred to in paragraph 10 of the Cease and Desist Order the sum of thirty six thousand
	·
j	
	Account after the payment of tax preparation expenses and liquidation costs to facilitate the
	liquidation.
	C. If (i) Holtzman fails to pay the investor referred to in paragraph 10 of the Cease and
	Desist Order the above referenced sum within fifteen business days after the date of execution of
	this Order or (ii) proof that the remedy provided in B. above has been completed is not provided



Jonathan D. Willian

Assistant Deputy Audiney General