

4. Respondent Holmes is a Georgia resident.
5. Upon information and belief, the last known home address for Respondent Holmes is 2034 Nelms Pointe Landing, Lawrenceville, Georgia 30043-7970.
6. Respondent Holmes operated and solicited investments for Respondent SERES.

7. Respondent SERES is a Georgia corporation organized in Georgia in 2006.

and was dissolved in or about August, 2009.

8. During the relevant period Respondent SERES conducted business from 106 Pennington

17. The Note given to Respondent KH in return for her funds, dated July 10, 2008, and signed by Respondent Holmes in the name of Respondent SERES, promised:
18. In or around July, 2008, South Carolina investor KH invested \$30,000.00 with the Respondents. Investor KH received a Note in return for her investment.
19. The Note given to South Carolina investor KH in return for her funds, dated July 10, 2008, and signed by Respondent Holmes in the name of Respondent SERES, promised:
- a. KH would be paid interest on the investment at the rate of 12.000% per annum,
 - b. Monthly principal and interest payments would be paid on the first day of each month beginning August 9, 2008, and
 - c. The Note would be paid in full not later than August 9, 2009.
20. In or around August, 2008, South Carolina investor VK invested \$20,000.00 with the Respondents. Investor VK received a Note in return for her investment.

the Respondents two payments of \$500.00 each. No further payments have been received as of May 1, 2010.

25. Investor VK, as of May 1, 2010, has not been paid interest or the return of her principal as promised.
26. At the time the Respondents accepted VK's investment they did not intend and/or had no ability to fulfill the duties to VK evidenced by the Note.
27. Neither of the offerees was instructed they needed to do anything other than provide

Respondents with no express or implied authority indicated on the Note to receive the promised

returns.

28. The investment opportunities offered by Respondents constitute "securities" pursuant to the Act.

29. Neither the Note nor the investment opportunities constituted a contract with VK or any other

b. Make investing “easy,” as within sixty days after investing the Respondents were in default with one or more investors and investor attempts to receive interest and, later, recover principal invested, as promised, were met with continual delays, unkept promises and, ultimately, failure.

34. At the time of the solicitation of funds Respondent Holmes had an outstanding tax lien, filed November 29, 2006, and also had been previously convicted of a criminal felony.

Holmes both had an outstanding tax lien, and (iii) that Holmes had been previously convicted of a criminal felony.

WHEREAS, the investments offered by SERES, Grant and Holmes are “securities”

within the meaning of S.C. Code Ann. § 35-1-102(29); and

have engaged, are engaging, and/or are about to engage in acts and practices which violate S.C.

WHEREAS, the 11th Judicial District of South Carolina, in its jurisdiction over the

In the event that the Defendant, in addition to requesting a hearing, shall admit to