

**ADMINISTRATIVE PROCEEDING
BEFORE THE
SECURITIES COMMISSIONER OF SOUTH CAROLINA**

IN THE MATTER OF:

**The Para Firm Corporation, Nathan
Halydier, and Garrett Halydier,**

Respondents.

ORDER TO CEASE AND DESIST

File No. 14039

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

S.C. Code Ann. § 35-1-101, *et seq.*, the South Carolina Uniform Securities Act of 2005 (the

"Act")

II. RESPONDENTS

2. Para Firm was a South Carolina corporation with a last known address of 1320 Main

Street Suite 200 Columbia South Carolina 29201

Drive, Columbia, South Carolina 29210.

4. Garrett Halydier has a last known address of 1531 Alencastre Street, Honolulu, Hawaii 96816.

5. Para Firm was incorporated on or about May 24, 2012

13. To invest, the Respondents stated that Investor A should let the Respondents borrow her credit information to obtain loans for Para Firm.

14. The Respondents further stated that Investor A should let a third party company (the

15. The Respondents further stated that Investor A should let a third party company (the

required for a credit application (the "Funding Agreement").

21. Investor A did not personally complete the Funding Agreement; rather, the Funding Agreement was completed and returned to the Nevada Company by the Respondents. Investor A did, however, electronically sign the Funding Agreement with the assistance of the Respondents.
22. The Funding Agreement stated that the Nevada Company would take a fee of 7.9% of the total value of the accounts it was able to open.
23. In or around April 2013, using Investor A's personal information supplied by the Respondents, the Nevada Company was able to open three lines of credit in Investor A's

credit in Investor A's name.¹

29. With knowledge that the credit lines were personal lines of credit in Investor A's name, the Respondents continued to miss payments on and charge personal expenses to the lines of credit.

30. On or about December 31, 2013, Investor A sent an email to the Respondents expressing concern that one of Investor A's personal credit accounts, which she had opened before

she invested with the Respondents, had its limit reduced to \$1,000 from \$10,000 due to late payments with other credit companies, specifically the credit companies with which the Respondents had missed payments on Investor A's behalf.

31. On or about January 2, 2014, Garrett Halydier replied to Investor A's December 31, 2013 email, assuring Investor A that the Respondents were working on a solution for her.

32. On or about January 4, 2014, Investor A sent another email to the Respondents in which she wrote that another one of her personal credit accounts, which she had opened before she invested with the Respondents, had been closed, again due to late payments with other credit companies. Investor A also stated that her credit score had been reduced to

the payments themselves, consult credit counseling organizations, and consider personal

44. Since the default, Nathan Halydier has entered into personal bankruptcy and Para Firm is defunct.

15 Investor A is now the sole responsible party for the \$26,000 of debt plus interest and late

report and the default harmed her credit score.

51. Contrary to the representations made to Investor A by the Respondents in connection with the offer of the investment opportunity, the \$4,269 fee drawn from Investor A's credit account by the Nevada Company with the Respondents' approval was in excess of the 7.9% fee stated in the Funding Agreement.

Investor B

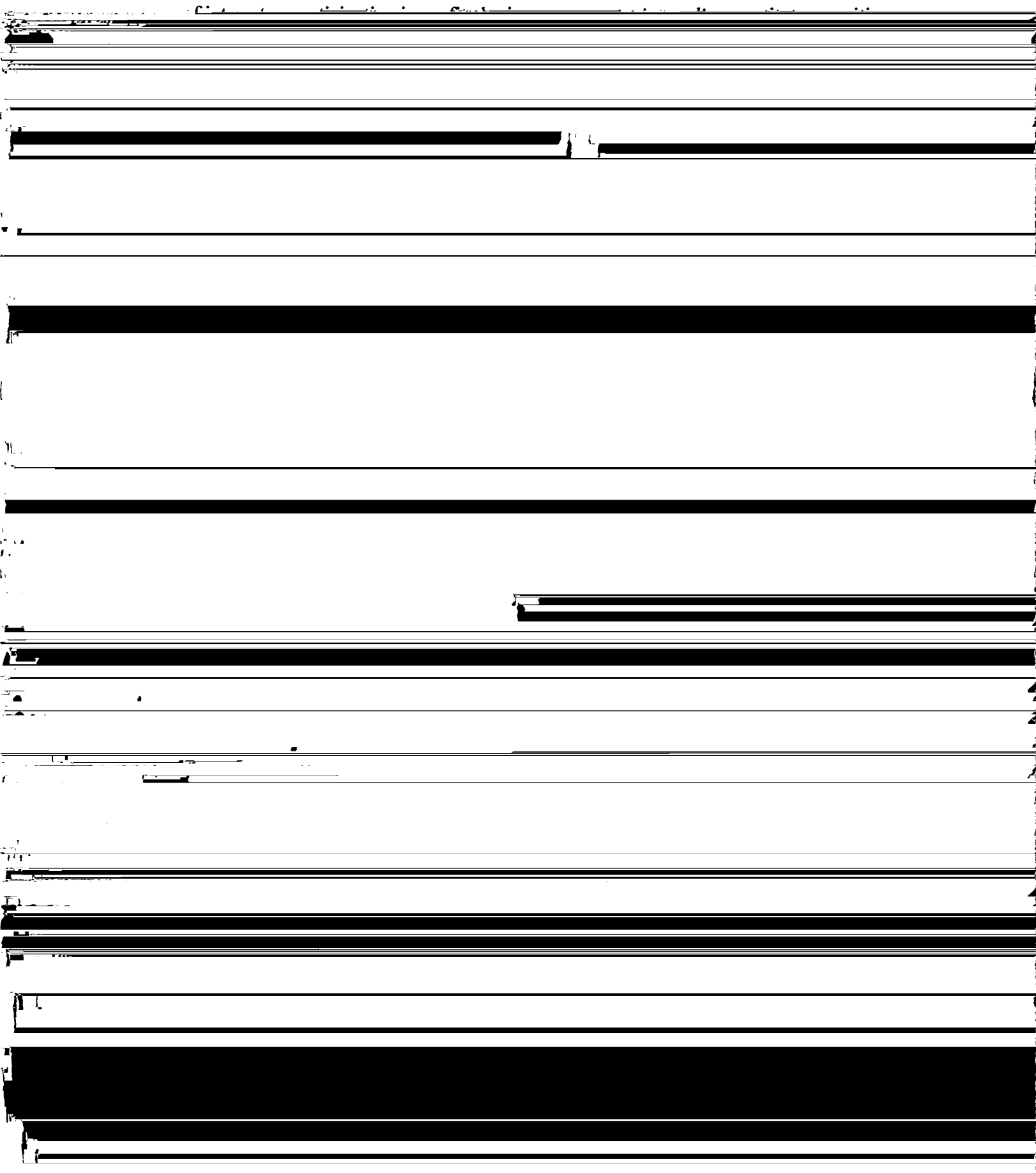
52. The Respondents similarly approached a Hawaii resident ("Investor B") and convinced

c. Expenses at numerous restaurants and bars; and

d. Repeated DVD rentals at Redbox kiosks.

58. *Continued to the next page on last page of the Document in connection*

66. Pursuant to S.C. Code Ann. § 35-1-102(29), investment contracts, stock, and certificates



upon another person.

73 The securities offered and sold by the Respondents were not federal covered securities

exempt from registration, nor registered with the United States Securities and Exchange

Commission or the Division and were therefore offered and sold in violation of S.C.

Code Ann. § 35-1-301.

74 Respondent Nathan Heludius on at least one occasion transacted business in this State as

V. CEASE AND DESIST ORDER

15.

ORDERED that:

- a. Respondent Para Firm and every successor, affiliate, control person, agent, servant, and employee of Para Firm, and every entity owned, operated, or indirectly or directly controlled by or on behalf of Para Firm **CEASE AND DESIST** from transacting business

the actual cost of investigation or proceeding; and

- f. Respondent Garrett Halydier pay a civil penalty in the amount of twenty-five thousand dollars (\$25,000) if this Order becomes effective by operation of law, or, if Garrett



STATE OF SOUTH CAROLINA
OFFICE OF THE ATTORNEY GENERAL

CERTIFICATE OF SERVICE AND

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UNIVERSITY OF SOUTH CAROLINA

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