

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

<b>IN THE MATTER OF:</b>	)	
	)	<b>CONSENT ORDER</b>
<b>Daniel R. Holtzman, Kadee, LLC,</b>	)	
<b>and Crossroads Investments, LLC,</b>	)	<b>File No. 20162782</b>
	)	
<b>Respondents.</b>	)	
<hr/>	)	

**WHEREAS**, the Securities Division of the Office of the Attorney General of the State of South Carolina (the “Division”), pursuant to authority delegated by the Securities Commissioner of South Carolina (the “Securities Commissioner”) pursuant to the authority granted to him in the South Carolina Uniform Securities Act of 2005 (the “Act”), S.C. Code Ann. § 35-1-101 *et. seq.* (Supp. 2016), initiated an investigation into certain activities of Daniel R. Holtzman, Kadee, LLC, 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 against the Respondents for the alleged 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

**WHEREAS**, Holtzman admits the allegations of the Cease and Desist Order relating to personal and subject matter jurisdiction and denies the remaining allegations contained therein; and

**WHEREAS**, Holtzman, acting on behalf of all of the Respondents, acknowledges his desire to resolve the Cease and Desist Order by Consent Order rather than by exercising the Respondents' rights to a formal hearing; and

**WHEREAS**, I, as Securities Commissioner for the State of South Carolina, having jurisdiction over the Respondents and the subject matter of these proceedings, find the remedies that the parties have both proposed and agreed to, as set forth in this Consent Order, both appropriate and in the public interest, for the protection of the investors and the capital markets of the State of South Carolina;

**NOW, THEREFORE**, it is **HEREBY ORDERED**, that:

A. Holtzman agrees that he will not participate in any aspect of the securities industry in or from South Carolina for twenty-four (24) months from the date of this Order; and

B. Holtzman, in his role as Managing Member of Respondent Kadee, LLC, will, within ten (10) calendar days after the date of execution of this Order, liquidate Kadee, LLC and pay the investor referred to in paragraph 10 of the Cease and Desist Order the sum of thirty six thousand two hundred sixty seven and 44/100 (\$36,267.44), which is the balance of funds in the Kadee 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

to the Securities Division within fifteen business days thereafter, Holtzman agrees that he shall be in default of this Consent Order and that the forty thousand dollars (\$40,000) civil penalty set forth in the Cease and Desist Order will be due to the Division immediately.

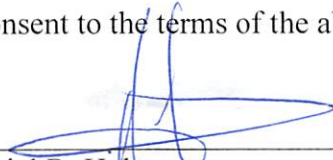
Upon execution by the Securities Commissioner, this Consent Order resolves Administrative Proceeding 20162782, and matters at issue in the Cease and Desist Order. The Division has the right to initiate a new investigation should additional information or facts come to light that would warrant further activity by the Division.

The parties to this Order further agree that this Consent Order does not and should not be interpreted to waive any (i) criminal cause of action, (ii) private cause of action that may have accrued to any investor(s), (iii) action of any kind in any type of bankruptcy proceeding(s), or (iv) other causes of action which may result from any activity of the Respondents not detailed above or which may hereafter arise.

**IT IS SO ORDERED** this 14<sup>th</sup> day of January, 2020.

  
\_\_\_\_\_  
The Honorable Alan Wilson  
Securities Commissioner  
State of South Carolina

I consent to the terms of the above Consent Order.

  
\_\_\_\_\_  
Date: 1-11-21  
Daniel R. Holtzman,  
acting on behalf of himself and as  
Managing Member of Kadee, LLC, and as  
Managing Member of Crossroads Investments, LLC

The Securities Division consents to the terms of the above Consent Order.  
South Carolina Securities Division:

By:  \_\_\_\_\_ Date: 1/14/21 \_\_\_\_\_

**Jonathan B. Williams**  
**Assistant Deputy Attorney General**