

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-against-

GPL VENTURES LLC,  
GPL MANAGEMENT LLC,  
ALEXANDER J. DILLON,  
COSMIN I. PANAIT,  
HEMPAMERICANA, INC.,  
SALVADOR ROSILLO,  
SEASIDE ADVISORS, LLC, and  
LAWRENCE B. ADAMS,

Defendants.

21 Civ. \_\_\_\_ ( )

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S  
EMERGENCY APPLICATION FOR AN ORDER TO SHOW CAUSE,  
TEMPORARY RESTRAINING ORDER,  
AND ORDER DIRECTING ACCOUNTINGS,  
AN ASSET FREEZE, EXPEDITED DISCOVERY, AND OTHER RELIEF**

Pursuant to Federal Rule of Civil Procedure 65(b), Plaintiff Securities and Exchange Commission (the "Commission") files this emergency application for an *ex parte* order granting emergency relief against certain of the Defendants named in this action, *viz.*, GPL Ventures LLC ("GPL Ventures"), GPL Management LLC ("GPL Management"), Alexander J. Dillon, Cosmin I. Panait (collectively, the "GPL Defendants").

In support of the Application and as grounds therefore, the Commission relies upon the (a) Complaint in this action, (b) Memorandum of Law, (c) Declaration of Sohan Awon, (d) Declaration of Richard Edelson, (e) Declaration of Peter Lamore, (f) Local Rule 6.1 Declaration of Adam S. Grace, and (g) [Proposed] Order to Show Cause. As set forth in those documents, temporarily restraining and preliminarily enjoining the GPL Defendants from ongoing violations of the dealer registration requirements of the securities laws under Section 15(a) of the Securities Exchange Act of 1934 [15 U.S.C.

§ 78o(a)], including but not limited to by buying and selling blocks of securities of microcap issuers for their own account, freezing the GPL Defendant' assets and requiring repatriation of assets, requiring GPL Ventures and GPL Management to provide accountings, and permitting expedited discovery, prohibiting the destruction of documents, and permitting alternate service, will maintain the *status quo*, halt the GPL Defendants ongoing violation of the dealer registration requirements, permit the Commission to conduct expedited discovery, and preserve the Commission's ability to recover disgorgement, prejudgment interest, and civil penalties after the Commission has had an opportunity to demonstrate the GPL Defendants' violations of the dealer registration requirements, which impose strict liability and do not require that a violator act with scienter.

The Commission respectfully requests that this Application be granted.

Dated: August 13, 2021  
New York, NY

SECURITIES AND EXCHANGE COMMISSION

By: */s/ Brenda Wai Ming Chang*  
*/s/ Paul G. Gizzi*  
*/s/ John C. Lehmann*

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Brenda Wai Ming Chang (changb@sec.gov)  
Paul G. Gizzi (gizzip@sec.gov)  
John C. Lehmann (lehmannj@sec.gov)  
Securities and Exchange Commission  
New York Regional Office  
200 Vesey Street, Suite 400  
New York, NY 10281-1022  
(212) 336-1100