

3. In connection with the offer and sale of Homeland's securities, the Defendants are making numerous material misrepresentations and omissions to investors through the Homeland website, telemarketers, and a private placement memorandum ("PPM"), including bogus promises of an initial public offering ("IPO").

4. The Defendants also falsely represent they will spend investor proceeds on marketing, obtaining additional Federal Communications Commission ("FCC") licenses, and acquiring a privately-held New Hampshire telecommunications company.

5. All of these claims are patently false. Homeland has never filed a registration statement with the Commission or made any other attempt to go public. Homeland has no FCC licenses or pending FCC license applications, and has not acquired the New Hampshire company. Additionally, the Defendants have failed to disclose that contemporaneous with the Defendants' offering of Homeland securities, Pennsylvania and Texas issued cease-and-desist orders against Homeland to stop selling its unregistered securities in those states.

6. Contrary to the Defendants' representations to investors about how they will spend the money, Labarre is misappropriating investors' funds, and has funneled nearly \$2 million to her family members and the Relief Defendants, which are companies LaBarre and her family control.

7. Through their conduct, the Defendants each are violating Sections 5(a), 5(c), and 17(a) of the Securities Act of 1933 ("Securities Act"), 15 U.S.C. §§ 77e(a), 77e(c), and 77q(a); and Section 10(b) and Rule 10b-5 of the Securities Exchange Act of 1934 ("Exchange Act"), 15 U.S.C. § 78j(b) and 17 C.F.R. § 240.10b-5. Based on the ongoing nature of their violations and the scienter the Defendants have demonstrated through their willful and wanton disregard for the federal securities laws, the Defendants have shown they will continue to violate the law unless the Court grants the injunctive and other relief the Commission seeks.

