UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

SECURITIES AND EXCHANGE COMMISSION, **Plaintiff,** **v.** **ANTHONY K. WELCH,** **Defendant.**	**Civil Action File No.** **1:12-CV-_____**

COMPLAINT FOR INJUNCTIVE AND OTHER RELIEF

The plaintiff, Securities and Exchange Commission ("Commission"), files this Complaint and alleges the following:

SUMMARY

1. The Commission brings this action to enjoin violations of the antifraud provisions of Section 10(b) of the Securities Exchange Act of 1934 ("Exchange Act") and Rule 10b-5(b) thereunder by Anthony K. Welch ("Welch"), the former chairman and chief executive officer of both eHydrogen Solutions, Inc. ("eHydrogen") and ChromoCure, Inc. ("ChromoCure"). In addition to a permanent injunction against Welch for fraud, the Commission also seeks an

accounting, disgorgement plus prejudgment interest, civil penalties, a penny stock bar and an officer and director bar.

2. eHydrogen and ChromoCure are both microcap stocks that have had prior recent histories of multiple name and control changes, and are now essentially defunct entities with no assets and little to no actual business operations.

3. From at least March 2010 through August 2010, Welch issued press releases and made other public disclosures containing false and misleading information concerning, among other things, technologies acquired by and revenues generated by eHydrogen and ChromoCure. The period of the press releases coincides with suspicious price and trading volume increases in the respective issuers' stock.

VIOLATIONS

4. Defendant Welch, by virtue of his conduct, directly or indirectly, has engaged and, unless enjoined, will engage in violations of Section 10(b) of the Securities Exchange Act of 1934 ("Exchange Act") [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5]. Welch also has liability as a controlling person, pursuant to Section 20(a) of the Exchange Act for violations by eHydrogen and ChromoCure of Section 10(b) of the Exchange Act and Rule 10b-

5(b) thereunder. Welch is alternatively charged herein with aiding-and-abetting the antifraud violations of eHydrogen and ChromoCure.

JURISDICTION AND VENUE

5. The Commission brings this action pursuant to Sections 21(d) and 21(e) of the Exchange Act [15 U.S.C. §§ 78u(d)-(e)] to enjoin Defendant Welch from engaging in the transactions, acts, practices and courses of business alleged in this Complaint, and transactions, acts, practices and courses of business of similar purport and object; for disgorgement of illegally obtained funds and other equitable relief; and, for civil money penalties.

6. This Court has jurisdiction over this action pursuant to Sections 21(d), 21(e) and 27 of the Exchange Act [15 U.S.C. §§ 78u(d), 78u(e) and 78aa].

7. Defendant, directly and indirectly, has made use of the mails, the means and instruments of transportation and communication in interstate commerce, and the means and instruments of interstate commerce, in connection with the transactions, acts, practices, and courses of business alleged in this Complaint.

8. Venue lies in this Court pursuant to Section 27 of the Exchange Act [15 U.S.C. § 78aa] because certain of the transactions, acts, practices and courses of business constituting violations of the Exchange Act occurred in the Northern District of Georgia. Specifically, the press releases outlined herein were circulated at least nationwide, including within the Northern District of Georgia and upon

information and belief there are investors within the district who have purchased stock in Defendant's companies.

THE DEFENDANT

9. **Anthony K. Welch** is an American citizen, who resides in Freeport, Bahamas. News releases issued by ChromoCure indicate that Welch was the chairman and chief executive officer of ChromoCure from June 2009 through at least August 2010. News releases issued by eHydrogen indicate that Welch was the chairman and chief executive officer of eHydrogen from January 2007 through August 2010.

10. Welch's CRD file maintained by FINRA indicates he previously maintained a Series 65 license as the chairman of Maxim Advisors, LLC ("Maxim"), a state registered investment adviser he controlled that was based in Oxford, Mississippi. The State of Mississippi revoked the registration of Maxim in 2004 after an exam revealed the firm was using false and misleading promotional material.

RELATED COMPANIES

11. **eHydrogen Solutions, Inc.** is a Reno, Nevada-based company, originally incorporated in Nevada in 1987 as Golden Love, Inc. The company went through multiple name and operations changes before becoming eHydrogen on October 6, 2009. eHydrogen purported to specialize in "the development of

hydrogen production and conversion systems for internal combustion vehicles and the design and development of hydrogen powered vehicles." eHydrogen's shares are not registered with the Commission, and it has no obligation to file reports under Sections 13(a) or 15(d) of the Exchange Act. The company is eligible for the "piggyback" exception of Exchange Act Rule 15c2-11 and its stock (symbol "EHYD") is quoted on OTC Link (formerly the "Pink Sheets") operated by OTC Markets Group, Inc.

12. **ChromoCure, Inc.** is a Reno, Nevada-based company, originally incorporated in Nevada in 2004 as NuVoci, Inc. The company went through multiple name and operations changes before becoming ChromoCure on June 8, 2009. ChromoCure purported to "develop and provide proprietary cancer detection systems." ChromoCure's shares are not registered with the Commission, and it has no obligation to file reports under Sections 13(a) or 15(d) of the Exchange Act. The company is eligible for the "piggyback" exception of Exchange Act Rule 15c2-11 and its stock (symbol "KKUR") is quoted on OTC Link.

FACTS

A. False, Misleading Press Releases with eHydrogen and ChromoCure

13. eHydrogen is a non-reporting public company that purports to specialize in the acquisition and development of on-demand hydrogen production technologies for use in vehicles.

14. ChromoCure is a non-reporting public company that purports to specialize in the development and commercialization of cancer detection systems.

15. In mid-2009, Welch acquired a control position as chairman and chief executive officer for both eHydrogen and ChromoCure.

16. Prior to Welch's assuming control over the companies, both had functionally operated as shell corporations, frequently changing names and control persons since their creation and had little to no revenue or actual business operations.

17. No person other than Welch is known to have been involved in the business, corporate or operational activities of eHydrogen or ChromoCure during the relevant periods. Upon information and belief, Welch is the only person who exercised any degree of control over the issuers or their operations, and is the only person involved in drafting and preparing the press releases for these companies.

18. From approximately March through October 2010, Welch spearheaded an internet based promotional campaign for eHydrogen and

ChromoCure, pumping out a high volume of near-weekly press releases containing a wide degree of, at best, questionable assertions regarding future business operations.

19. In multiple instances such statements were intentionally false and misleading, distributed by Welch for no purpose other than to incite trading activity and artificially inflate the price and trading volume of eHydrogen and ChromoCure.

20. A press release of eHydrogen dated 3/2/2010 contained the statement "eHydrogen Solutions, Inc. announced today the completion of an Intellectual Property (IP) Transfer Agreement substantially expanding its core On Demand Hydrogen Production (ODHP) technologies. In addition to its advanced electrolysis technologies, the Company has now acquired new leading edge ODHP, including real-time hydrogen production, utilizing a combination of Reactive Metals, nanotechnology and plasma reformation. The transaction is valued at $2,000,000 purchased with a combination of Preferred Stock and minority debt."

21. The statement by defendant Welch in eHydrogen's 3/2/2010 press release set forth in the preceding paragraph was false and misleading as to the acquisition and/or the valuation, and was issued by defendant Welch without a reasonable basis to support the statement.

22. A press release dated 3/16/2010 and issued by ChromoCure contained the statement, “The Company’s proprietary Chromosomal Scanner systems have proven accurate and efficient in the measurement of the unique genomic characteristic found in 100% of all cancers and never found in normal cells. The Company’s detection technology has been proven to have an effective accuracy of 100% for all cancers at all stages. This is superior to other detection approaches presently employed by pathologists, including biomarker detections, in every measurable way.” The same press release also stated, “Research has conclusively and irrefutably demonstrated aneuploidy as a more accurate predictor of cancer than cytological/histological analysis or genetic marker-based diagnostics that are the only other methods in existence today. ChromoCure’s systems measure aneuploidy as the sole means of detecting cancer presence and measuring cancer progression. The system has a 100% effective accuracy rate.” Also, the same press release stated, “[T]he Company recently published its collaborative clinical testing with a major cancer clinic.” Finally, the 3/16/2010 press release issued by Chromocure stated, “The Company’s proprietary CS200 Chromosomal Scanner has been proven accurate and efficient in the measurement of the unique genomic characteristic found in 100% of all cancers and never found in normal cells. The Company’s detecting technology has an effective accuracy of 100% for all cancers at all stages.”

23. The representations in the 3/16/2010 press release are false or misleading, and were made by Welch and ChromoCure without any reasonable basis therefor. In fact, no 100% accurate cancer detection system is known to exist in the world. Moreover, upon information and belief, none of the purported technologies or clinical relationships touted in that press release, exist.

24. A press release dated 5/6/10 issued by ChromoCure announced that a merger agreement between ChromoCure and Genome Research Group had "a final valuation of $29,000,000 representing the valuation of the GRG operations and assets, including GRG's proprietary advanced therapeutic modeling protocols and algorithms utilizing hypothermic modulation and resonance."

25. Upon information and belief, the representations in the 5/6/2010 press release as set forth in the preceding paragraph are false and misleading, and were made by Welch and ChromoCure without any reasonable basis therefor. Although subsequent press releases inconsistently suggest both a potential name change by ChromoCure to Genome Research Group as well as referenced upcoming merger between ChromoCure and Genome Research Group, there is no known independent verification of the existence, as of 5/6/2010, of any actual legal entity known as Genome Research Group. Moreover, there was no basis to value the merged companies at $29 million.

26. A 5/18/2010 press release issued by ChromoCure states "The Company's cancer detecting system locates and measures unique genomic characteristics found in 100% of all cancers and never found in normal cells. The company's detection technology has an effective 100% accuracy rate and an effective 100% specificity therefore making 'false positives' and 'false negatives' theoretically impossible." The same press release also stated "The Company recently announced the addition of Full Spectrum ChromoSomal Scan Capability for Broad Base Cancer Progression Assessment: Further Enhancing Detection & Progression Monitoring. These new capabilities allow for comprehensive DNA-index quantification and precise measurement of chromosomal imbalance ratios and amounts; thereby providing increasing value of vital cancer progression analysis data for the precise assessment remission rates and protocol efficacy in the Company's expanded Therapeutic Research initiatives worldwide."

27. The statements contained in the 5/18/2010 press release are false or misleading, and were made by Welch and ChromoCure without any reasonable basis therefor. For example, there is no cancer detection system with 100% accuracy.

28. A 6/3/2010 press release issued by eHydrogen stated, "eHydrogen Solutions, Inc. files financial report for the period ending June 3, 2010. $15.9 million in Revenue since inception and 1,360% increase in Assets." The same

press release also stated, “The Company’s portfolio possesses of core proprietary On Demand Hydrogen Production (ODHP) technologies that have a preliminary market valuation of $6,736,000.”

29. The statements contained in the 6/3/2010 press release are false or misleading, and were made by Welch and eHydrogen without any reasonable basis therefor.

30. An 8/5/2010 press release issued by eHydrogen stated, “[I]ts advanced Hydrogen Vehicle Fuelling Module (H2VFM), in its Hydrogen Fuelling Station configuration, would enhance the recently announced Hydrogen Fuel Cell taxi being built by Lotus for the London Taxi System.”

31. The statements contained in the 8/5/2010 press release are false or misleading, and were made by Welch and eHydrogen without any reasonable basis therefor.

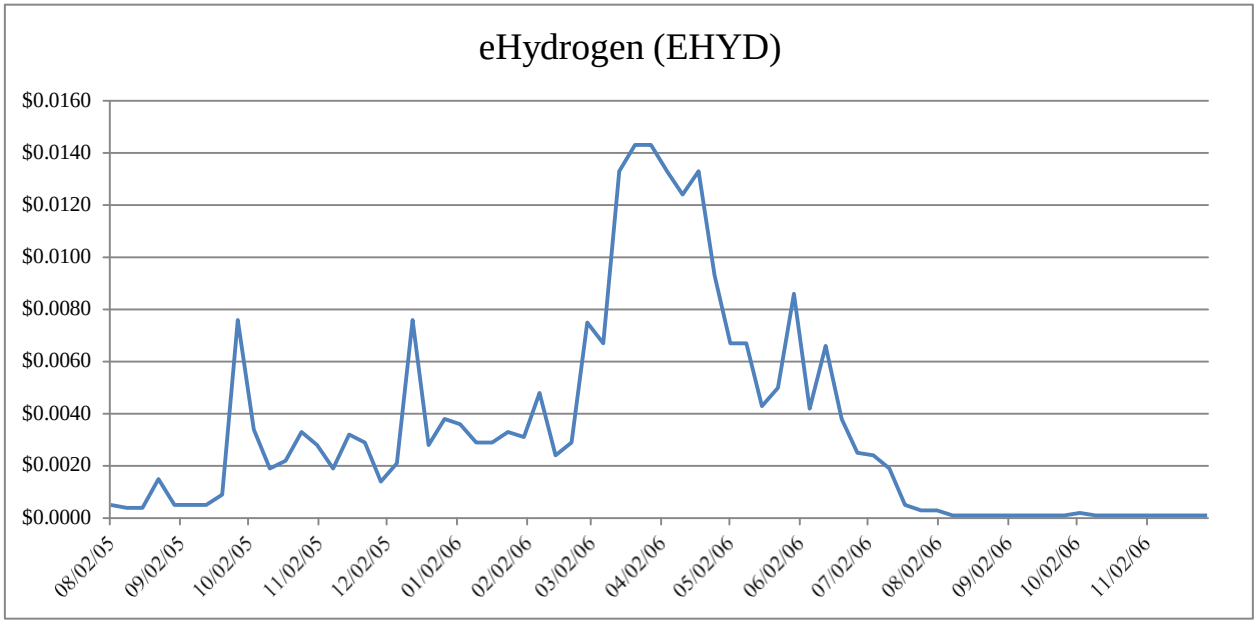
32. As with many similar promotions, Welch’s concerted press release activity appears directed at not just a single point at time, but at an overall heightened degree of activity throughout the entirety of the campaign.

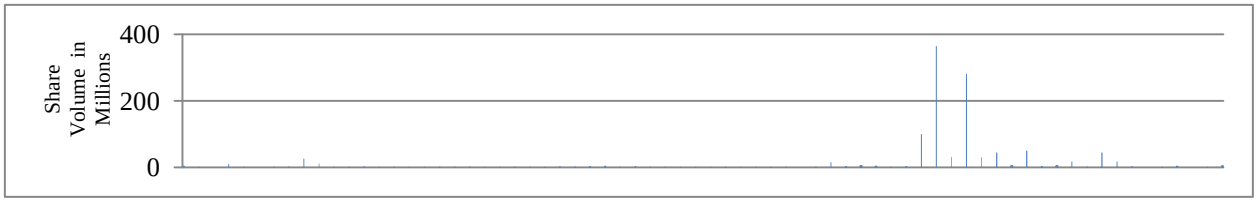
33. With respect to eHydrogen, its stock price increased nearly 600% at points throughout the campaign, from a low of $0.0024 on March 1, 2010 to an intra-campaign high of $0.0143 on March 30, 2010, with various irregular spikes throughout. Volume increased in a corresponding fashion, from no recorded

transactions on March 1, 2010 up to approximately 10.8 million shares trading on June 3, 2010.

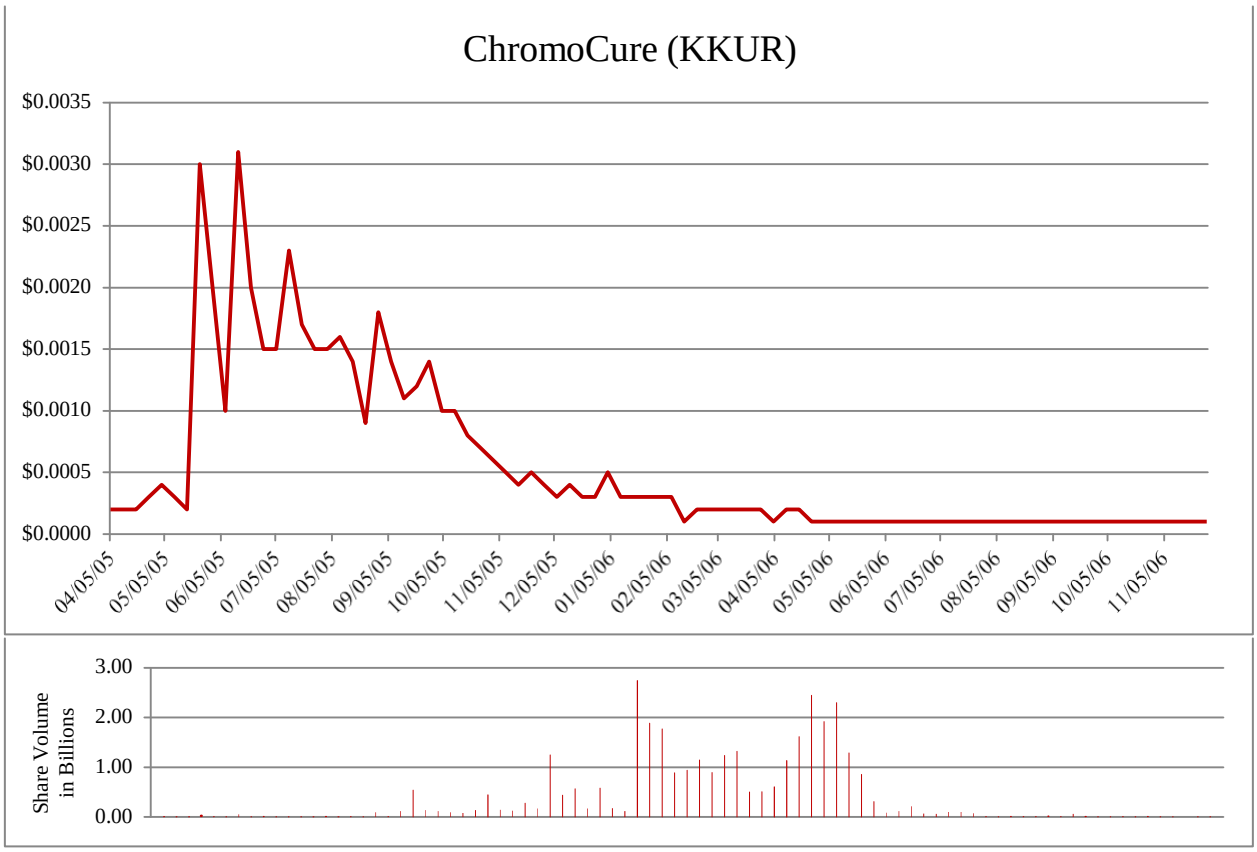
34. ChromoCure's stock exhibited similar, if not more sporadic activity, increasing approximately 300% from a pre-campaign low of $0.0001 on February 19, 2010 to $0.0003 on six separate trading days in March 2010. ChromoCure's stock volume spiked from a low of approximately 30.5 million shares on February 17, 2010 to a high of 1.8 billion shares on April 15, 2010.

35. A Price/Volume chart illustrating the highly irregular activity in eHydrogen stock following Welch's assumption of control over that issuer and the subsequent campaign of false and misleading press releases for that company looks as follows:





36. A Price/Volume chart illustrating the highly irregular activity in ChromoCure stock following Welch's assumption of control over that issuer and the subsequent campaign of false and misleading press releases for that company looks as follows:



37. Welch appears to be the individual solely responsible for the publication of the false and misleading press releases in 2010 issued by eHydrogen

and ChromoCure, and it is his scienter that establishes primary violations by those defunct companies, as aided and abetted by Welch.

COUNT I—FRAUD
Violations of Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5(b) thereunder [17 C.F.R. § 240.10b-5(b)]

38. Paragraphs 1 through 37 are hereby realleged and are incorporated herein by reference.

39. From at least March 2010 through at least August 2010, Defendant Welch, in connection with the purchase and sale of securities described herein, by the use of the means and instrumentalities of interstate commerce and by use of the mails, directly and indirectly, made untrue statements of material facts and omitted to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

40. The Defendant knowingly, intentionally, and/or recklessly made untrue statements of material facts and omitted to state material facts. In engaging in such conduct, the Defendant acted with scienter, that is, with an intent to deceive, manipulate or defraud or with a severe reckless disregard for the truth.

41. By reason of the foregoing, the Defendant, directly and indirectly, has violated and, unless enjoined, will continue to violate Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5(b) thereunder [17 C.F.R. § 240.10b-5(b)].

COUNT II—ALTERNATIVELY AIDING AND ABETTING FRAUD
Aiding and Abetting Violations of Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5(b) thereunder [17 C.F.R. § 240.10b-5(b)]

42. Paragraphs 1 through 37 are hereby realleged and are incorporated herein by reference.

43. In the alternative, Welch aided and abetted the primary violations of the antifraud provisions engaged in by eHydrogen and ChromoCure.

44. From at least March 2010 through at least August 2010, Defendant Welch, in connection with the purchase and sale of securities described herein, by the use of the means and instrumentalities of interstate commerce and by use of the mails, aided and abetted eHydrogen and ChromoCure, as those companies made untrue statements of material facts and omitted to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

45. The Defendant knowingly, intentionally, and/or recklessly made untrue statements of material facts and omitted to state material facts. In engaging in such conduct, the Defendant acted with scienter, that is, with an intent to deceive, manipulate or defraud or with a severe reckless disregard for the truth.

46. By reason of the foregoing, the Defendant, directly and indirectly, has aided and abetted violations of and, unless enjoined, will continue to aid and abet

violations of Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5(b) thereunder [17 C.F.R. § 240.10b-5].

COUNT III—CONTROL PERSON LIABILITY
Control PersonViolations of Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5(b) thereunder [17 C.F.R. § 240.10b-5], Pursuant to Section 20(a) of the Exchange Act

47. Paragraphs 1 through 37 are hereby realleged and are incorporated herein by reference.

48. As the person who, directly or indirectly, controlled eHydrogen and ChromoCure during the relevant period, Welch is liable jointly and severally and to the same extent as those entities that he controlled for the violations of the antifraud provisions committed by those entities.

49. As the control person of eHydrogen and ChromoCure, Welch directly or indirectly induced the act or acts which constituted violations by eHydrogen and ChromoCure of the antifraud provisions of Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5(b) thereunder [17 C.F.R. § 240.10b-5] by knowingly, intentionally, and/or recklessly making untrue statements of material facts and omitting to state material facts.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Commission, respectfully prays that the Court:

I.

Make findings of fact and conclusions of law in accordance with Rule 52 of the Federal Rules of Civil Procedure.

II.

Issue a permanent injunction enjoining Defendant Welch, and his agents, servants, employees, attorneys, and all persons in active concert or participation with him who receive actual notice of the order by personal service or otherwise, and each of them:

a. from violating Section 10(b) of the Exchange Act [15 U.S.C. 78j(b)] and Rule 10b-5(b) thereunder [17 C.F.R. 240.10b-5(b)];

b. in the alternative, from aiding and abetting violations of Section 10(b) of the Exchange Act [15 U.S.C. 78j(b)] and Rule 10b-5(b) thereunder [17 C.F.R. 240.10b-5(b)] committed by eHydrogen and ChromoCure; and

c. as control person of eHydrogen and ChromoCure, from violating Section 10(b) of the Exchange Act [15 U.S.C. 78j(b)] and Rule 10b-5(b) thereunder [17 C.F.R. 240.10b-5(b);

III.

Issue an Order requiring Defendant Welch to disgorge all ill-gotten gains and losses avoided as alleged in the Commission's Complaint, plus pay prejudgment interest thereon.

IV.

Issue an Order requiring Defendant Welch, pursuant to Sections 21(d)(3) and 21A of the Exchange Act [15 U.S.C. 78u(d)(3) and 78u-1], to pay civil monetary penalties.

V.

Issue an Order pursuant to Section 21(d)(2) of the Exchange Act [15 U.S.C. 78u(d)(2)] permanently prohibiting Defendant Welch from acting as an officer or director of any company that has a class of securities registered with the Commission pursuant to Section 12 of the Exchange Act [15 U.S.C. 78l] or that is required to file reports with the Commission pursuant to Section 15(d) of the Exchange Act [15 U.S.C. 78o(d)].

VI.

Issue an Order pursuant to both Section 603 of the Sarbanes-Oxley Act of 2002 (which amended Section 20 of the Securities Act and Section 21(d) of the

Exchange Act) and the inherent equitable powers of this Court, which bars Defendant Welch from participating in any offering of a penny stock, including acting as a promoter, finder, consultant, agent, or other person who engages in activities with a broker, dealer or issuer for purposes of the issuance or trading in any penny stock; or inducing or attempting to induce the purchase or sale of any penny stock.

VII.

Issue an Order that retains jurisdiction over this action in order to implement and carry out the terms of all orders and decrees that may have been entered or to entertain any suitable application or motion by the Commission for additional relief within the jurisdiction of this Court.

VIII.

Grant such other and further relief as may be necessary and appropriate.

RESPECTFULLY SUBMITTED,

/s/Edward G. Sullivan
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