

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA  
HARRISBURG DIVISION**

**U.S. SECURITIES AND  
EXCHANGE COMMISSION,**

**Plaintiff,**

**vs.**

**SEAN NATHAN HEALY,**

**Defendant,**

**and**

**SHALESE HEALY and  
SAND DOLLAR INVESTING PARTNERS,  
LLC,**

**Relief Defendants.**

**Civil Action  
No.**

***EX PARTE* MOTION FOR A TEMPORARY RESTRAINING ORDER,  
ORDER FREEZING ASSETS AND GRANTING OTHER RELIEF,  
AND FOR AN ORDER TO SHOW CAUSE ON A PRELIMINARY  
INJUNCTION**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiff Securities and Exchange Commission (“Commission” or “SEC”) hereby moves this Court *ex parte* for an Order directing Defendant Sean Nathan Healy (“Defendant” or “Healy”), and Relief Defendants Shalese Healy and

Sand Dollar Investing Partners LLC (collectively, the “Relief Defendants”) to show cause why an order should not be entered pending a final disposition of this action: (i) preliminarily enjoining the Defendant from violating Section 17(a) of the Securities Act of 1933, 15 U.S.C. § 77q(a), and Section 10(b) of the Securities Exchange Act of 1934, 15 U.S.C. § 78j(b), and Rule 10b-5 thereunder, 17 C.F.R. § 240.10b-5; (ii) freezing the assets of the Defendant and the Relief Defendants; (iii) requiring the Defendant and Relief Defendants to each provide a verified accounting; (iv) preventing the destruction or alteration of evidence; (v) appointing a Receiver over the Defendant’s assets and the Relief Defendants’ assets traceable to the fraud as set forth in the proposed order, and (vi) other appropriate relief.

During the pendency of its Motion for an Order to Show Cause described above, the Commission further respectfully moves this Court, *ex parte*, for an Order: (i) temporarily restraining the Defendant from violating Section 17(a) of the Securities Act of 1933, 15 U.S.C. § 77q(a), and Section 10(b) of the Securities Exchange Act of 1934, 15 U.S.C. § 78j(b), and Rule 10b-5 thereunder, 17 C.F.R. § 240.10b-5; (ii) freezing the assets of the Defendant and Relief Defendants; (iii) directing the Defendant and Relief Defendants to provide a verified accounting; (iv) providing that the parties may take expedited discovery in preparation for a preliminary injunction

hearing; (v) preventing the destruction or alteration of evidence; (vii) providing for alternative means of service; (viii) appointing a Receiver over the Defendant's assets and the Relief Defendants' assets traceable to the fraud as set forth in the proposed order; and (ix) other appropriate relief.

The grounds supporting this Motion are fully set forth in the accompanying documents, including the Commission's Complaint, the supporting Memorandum, and all Declarations and Exhibits attached thereto or referenced therein.

The undersigned counsel certifies, in his Declaration attached to the Memorandum in Support pursuant to Rule 65(b) of the Federal Rules of Civil Procedure, that investor funds are in jeopardy, and that, therefore, no advance written notice was given to the Defendant or Relief Defendants prior to filing this Motion and the accompanying papers with the Court.

A proposed order is being filed with this Motion.

Respectfully submitted,

Dated: July 12, 2009

          /s/ Fred L. Block          /  
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