

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**JAMES T. PATTEN, PETER L. COKER, SR.,
AND PETER L. COKER, JR.,**

Defendants.

Civil Action No. 22-CV-5703

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff Securities and Exchange Commission (the “SEC” or “Commission”), 1617 JFK Boulevard, Suite 520, Philadelphia, Pennsylvania 19103, files this Complaint against the following three Defendants:

1. James T. Patten
219 Lucerne Ln.
Winston Salem, NC 27104
2. Peter L. Coker, Sr.
12804 Morehead
Chapel Hill, NC 27517
3. Peter L. Coker, Jr.
Pacific Place Apartments, Suite 3009
88 Queensway Central
Hong Kong (SAR)

The SEC alleges as follows:

SUMMARY OF THE ACTION

4. Defendants James T. Patten (“Patten”), Peter L. Coker, Sr. (“Coker Sr.”), and Peter L. Coker, Jr. (“Coker Jr.”) (collectively, “Defendants”) perpetrated two fraudulent manipulative trading schemes.

5. Defendants took control of the issued and outstanding shares of two companies: Makamer Holdings, Inc. (f/k/a Hometown International, Inc.) (“Hometown International”), an entity that had operations consisting only of a single deli in southern New Jersey, and EZRaider Co. (f/k/a E-Waste Corporation) (“E-Waste Corp.”), a shell company that had no substantive operations. Defendants artificially inflated the price of these companies’ stock through manipulative trading that Defendants executed through affiliated and nominee accounts they controlled, often using the same IP addresses to execute the trades. In so doing, Defendants artificially raised the price and trading volume of the entities’ common stock, creating the false appearance of active trading and a rising price for the security.

6. Via their scheme, Defendants artificially inflated the price of common stock of Hometown International to more than \$13.00 per share, which produced a market capitalization of approximately \$100 million for a single-store deli with less than \$40,000 in annual revenue.

7. At around the same time, Defendants artificially inflated the price of E-Waste Corp. common stock from \$0.10 to \$10.00 per share, which resulted in a market capitalization of approximately \$120 million for a shell company with no revenue.

8. Defendants have profited from their scheme via selling and holding the stock of Hometown International and E-Waste Corp. at artificially inflated values and by causing the companies to transfer funds to them, directly or through purported “consulting” agreements.

9. In addition, Defendants have injured innocent investors who purchased the stock of Hometown International and E-Waste Corp. at artificially inflated prices.

10. By engaging in the conduct described in this Complaint, Patten, Coker Sr., and Coker Jr. violated, and unless enjoined will continue to violate, Sections 17(a)(1) and (3) of the Securities Act of 1933 (“Securities Act”) [15 U.S.C. § 77q(a)(1) and (3)] and Section 10(b) of the Securities Exchange Act of 1934 (“Exchange Act”) [15 U.S.C. § 78j(b)] and Rules 10b-5(a) and (c) thereunder [17 C.F.R. § 240.10b-5(a) and (c)]. In addition, Patten is liable for violating Section 9(a)(1) of the Exchange Act [15 U.S.C. § 78i(a)(1)], and Coker Sr. and Coker Jr. are liable for aiding and abetting Patten’s violations of Section 9(a)(1) of the Exchange Act [15 U.S.C. § 78t(e)].

JURISDICTION AND VENUE

11. The Commission brings this action pursuant to Sections 20(b) and 20(d) of the Securities Act [15 U.S.C. § 77t(b) and (d)] and Sections 20(e) and 21(d) of the Exchange Act [15 U.S.C. §§ 78t(e), 78u(d)] to enjoin such acts, practices, and courses of business, and to obtain disgorgement, prejudgment interest, and civil money penalties. The Commission also seeks a judgment prohibiting Defendants from participating in an offering of any penny stock pursuant to Section 20(g) of the Securities Act [15 U.S.C. § 77t(g)] and Section 21(d)(6) of the Exchange Act [15 U.S.C. § 78u(d)(6)]. The Commission also seeks any other and further relief the Court may deem just and appropriate.

12. The Court has jurisdiction pursuant to Sections 20(d) and 22(a) of the Securities Act [15 U.S.C. §§ 77t(d) and 77v(a)] and Sections 21(d) and 27 of the Exchange Act [15 U.S.C. §§ 78u(d) and 78aa]. Defendants, directly or indirectly, made use of the mails, or the means and instrumentalities of interstate commerce, or the facility of national security exchanges, in

connection with the transactions, acts, practices, and courses of business alleged in this Complaint.

13. Venue is proper pursuant to Section 27 of the Exchange Act [15 U.S.C. § 78aa], because certain of the acts, practices, and courses of business constituting the alleged violations occurred within the District of New Jersey.

DEFENDANTS

14. **James T. Patten (previously defined as “Patten”)**, age 63, resides in Winston Salem, North Carolina. Patten is employed by Tryon Capital LLC, which is controlled by Coker Sr. and another individual (“Individual 1”). Patten also controls Benchmark Capital LLC and is Vice President of Global Equity Limited. In 2006, FINRA barred Patten from associating with any member firm. Prior to that time, Patten was associated with several broker-dealers and was the subject of repeated disciplinary actions by FINRA.

15. **Peter L. Coker Sr. (previously defined as “Coker Sr.”)**, age 80, is a resident of Chapel Hill, North Carolina. Along with Individual 1, Coker Sr. controls Tryon Capital LLC and Europa Capital Investments LLC. From 1999 to 2003, Coker Sr. was a registered broker.

16. **Peter L. Coker Jr. (previously defined as “Coker Jr.”)**, age 53, is a resident of Hong Kong. Coker Jr. is the son of Coker Sr. and is the former Chief Executive Officer and Chairman of the Board of Hometown International. Coker Jr. served as Chairman of the Board of Hometown International from February 2020 through April 2022 and as Chief Executive Officer of the company from May 2021 through April 2022. Coker Jr. has served on the board of other private and public companies located in Hong Kong and New Zealand. Coker Jr. controls a number of Hong Kong and U.S.-based nominee entities, which defendants used to

perpetrate the schemes alleged in this case, including Global Equity Limited, IPC-Trading Company, RTO Limited, and VCH Limited. Coker Jr. was previously registered as a broker.

RELATED ENTITIES AND INDIVIDUAL

17. **Makamer Holdings, Inc. (f/k/a Hometown International, Inc.) (previously defined as “Hometown International”)** is incorporated in Nevada with a current principal place of business in Los Angeles, California. The company’s shares are quoted on OTC Link, whose parent company is OTC Markets Group, Inc., under the trading symbol HWIN. Hometown International voluntarily files quarterly and annual reports with the SEC. In April 2022, the company completed its acquisition of a private Delaware corporation and changed its name with the State of Nevada from Hometown International, Inc. to Makamer Holdings, Inc. At the same time, Coker Jr. was replaced as Chief Executive Officer by Makamer Holdings’ President. Makamer Holdings purports to develop and market biodegradable resins. The single deli that comprised Hometown International’s operations was located in New Jersey. In addition, from the time Hometown International was formed until May 2021, the President and Vice President of Hometown International were individuals who resided in New Jersey. Patten communicated with these individuals regarding Hometown International while they were in New Jersey. In addition, Patten communicated with at least one nominee account holder residing in New Jersey whose brokerage account Patten used to engage in manipulative trading in connection with the schemes alleged herein.

18. **EZRaider Co. (f/k/a E-Waste Corporation) (previously defined as “E-Waste Corp.”)** is incorporated in Nevada with a current principal place of business in Kent, Washington. The company’s shares are quoted on OTC Link under the trading symbol EZRG. E-Waste Corp. voluntarily files quarterly and annual reports with the SEC. In September 2021,

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