UNITED STATES OF AMERICA Before the SECURITIES AND EXCHANGE COMMISSION

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ADMINISTRATIVE PROCEEDING File No. 3-16358

In the Matter of

SPECTRUM CONCEPTS, LLC, DONALD JAMES WORSWICK, MICHAEL NICHOLAS GROSSO, and MICHAEL PATRICK BROWN,

Respondents.

DIVISION OF ENFORCEMENT'S MOTION TO DEEM RESPONDENT GROSSO IN DEFAULT PURSUANT TO RULE 155(a)(2)

The Division of Enforcement ("the Division") hereby moves the Court, pursuant to Rule 155(a)(2) of the Commission's Rules of Practice, for an Order which deems Respondent Michael Nicholas Grosso to be in default.

 2015. Mr. Grosso's Answer was due not later than March 15, 2015. Since that date, Grosso has not filed an Answer to the OIP.

As Grosso has failed to file an Answer as Ordered by the Commission in the OIP and this case is scheduled for trial commencing May 11, 2015, the Division moves the Court to enter an order which deems Grosso to be in default pursuant to Rule 155(a)(2) of the Commission's Rules of Practice. That order of default should include as findings against Mr. Grosso, all of the relevant allegations that the OIP contains. Among those default findings is that Grosso received \$27,500 of investor proceeds from a co-respondent. (OIP, ¶6). That is the amount that should be ordered as disgorgement against Mr. Grosso. Mr. Grosso should also be ordered to pay prejudgment interest on that amount. A prejudgment interest calculator printout is attached hereto as Exhibit A showing that prejudgment interest on \$27,500 totals \$2,056.76. In addition, given the blatant nature of the prime bank fraudulent scheme outlined in the OIP, the fact that Mr. Grosso assisted his co-Respondents by selling the "Enhancement Agreements" (See OIP, ¶2) which promised outlandish returns ranging from 900% in 20 days to 4,627% annually (See OIP, ¶3), the Court should also impose at least a third tier civil penalty against Mr. Grosso, if not a separate third tier penalty for each of the investors who Grosso solicited and who invested through the use of the offering document "Enhancement Agreements." Finally, the default order against Mr. Grosso should include a directive that the Respondent cease and desist from further fraudulent conduct.

Respectfully submitted, this 16th day of March, 2015.

Edward G. Sullivan

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U.S. Securities and Exchange Commission Division of Enforcement

Prejudgment Interest Report

Michael Nicholas Grosso

Quarter Range	Annual Rate	Period Rate	Quarter Interest	Principal+Interest
Violation Amount				\$27,500.00
10/01/2012-12/31/2012	3%	0.75%	\$207.38	\$27,707.38
01/01/2013-03/31/2013	3%	0.74%	\$204.96	\$27,912.34
04/01/2013-06/30/2013	3%	0.75%	\$208.77	\$28,121.11
07/01/2013-09/30/2013	3%	0.76%	\$212.64	\$28,333.75
10/01/2013-12/31/2013	3%	0.76%	\$214.25	\$28,548.00
01/01/2014-03/31/2014	3%	0.74%	\$211.18	\$28,759.18
04/01/2014-06/30/2014	3%	0.75%	\$215.10	\$28,974.28
07/01/2014-09/30/2014	3%	0.76%	\$219.09	\$29,193.37
10/01/2014-12/31/2014	3%	0.76%	\$220.75	\$29,414.12
01/01/2015-02/28/2015	3%	0.48%	\$142.64	\$29,556.76
Prejudgment Violation Range			Quarter Interest Total	Prejudgment Total
10/01/2012-02/28/2015			\$2,056.76	\$29,556.76

