

APR 11 2012

STATE OF INDIANA
OFFICE OF THE SECRETARY OF STATE
SECURITIES DIVISION

INDIANA
SECRETARY OF STATE

IN THE MATTER OF:

VALIANT HEALTH CARE, INC. DBA ACCESSIBLE
HOME HEALTH CARE, VALIANT ACMS, INC. F/K/A
VALIANT HEALTHCARE, INC., ACCESSIBLE HEALTHCARE
SERVICES, INC. DBA ACCESSIBLE HOME HEALTH CARE,
AARIF DOHAD, JOHN ROWSELL, MIRELLA SALEM, AND
STEVEN TURNER,

Respondents.

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) Cause No. 11-0248 CD
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ORDER TO SHOW CAUSE AND TO CEASE AND DESIST

The Staff of the Office of the Secretary of State, Securities Division, has filed an Administrative Complaint against Valiant Health Care, Inc. d/b/a Accessible Home Health Care ("VHC"), Valiant ACMS, Inc. f/k/a Valiant Healthcare, Inc. ("Valiant Delaware"), Accessible Healthcare Services, Inc. d/b/a Accessible Home Health Care ("AHS"), Aarif Dohad ("Dohad"), John Rowsell ("Rowsell"), Mirella Salem ("Salem"), and Steven Turner ("Turner"), alleging violations of the Indiana Franchise Act, Ind. Code 23-2-2.5 ("Act"), and requesting, *inter alia*, that Respondents show cause why administrative penalties should not be levied against them and/or why the registration of VHC as a franchisor should not be revoked in the state of Indiana and that Respondents be ordered to cease and desist from violating the Act.

Pursuant to Ind. Code § 23-2-2.5-34, the duly appointed Administrative Law Judge ("ALJ") may issue an Order to Show Cause and to Cease and Desist without a hearing if there exists a substantial threat of immediate irreparable harm whenever it appears to the ALJ, upon investigation,

that a person has engaged in or is about to engage in an act or practice constituting a violation of the Act.

The ALJ, having reviewed the Administrative Complaint and being duly advised, finds that grounds exist under the Act for ordering the Respondents to show cause as to why administrative penalties should not be levied against them and/or why the registration of VHC as a franchisor should not be revoked in the state of Indiana. The ALJ further finds that such an order is in the public interest.

The ALJ ORDERS Respondents VHC, Valiant Delaware, AHC, Salem, and Turner to immediately CEASE AND DESIST from making false representations of material fact and/or omitting to state material facts in Franchise Disclosure Documents filed with the Indiana Secretary of State, Securities Division ("Division") in violation of Ind. Code §§ 23-2-2.5-13, 27, and/or 16 CFR 436.5(b).

The ALJ ORDERS Respondents Valiant Delaware, Dohad, Rowsell, and Salem to immediately CEASE AND DESIST from making false representations of material fact and/or omitting to state material facts in connection with the offer or sale of a franchise to prospective franchisees in violation of Ind. Code § 23-2-2.5-27.

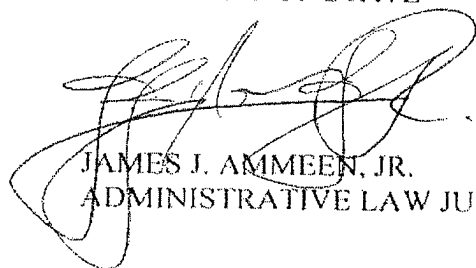
IT IS, therefore, ORDERED that the Respondents file a written response to the Administrative Complaint within fifteen (15) days of service hereof and appear before the ALJ at 9:30 a.m. ~~pm~~ on WEDNESDAY, MAY 16, 2012, in the conference room of the Securities Division, located in room E-111 of the Indiana Government Center South, 302 West Washington Street, Indianapolis, Indiana 46204 then and there to SHOW CAUSE, if any they have, as to why administrative penalties should not be levied against them and/or why the registration of VHC as a franchisor in the state of Indiana should not be revoked.

Respondents shall be deemed to be in default if an answer is not filed within the time provided and the allegations of the Administrative Complaint will be deemed admitted.

ORDERED at Indianapolis, Indiana this 11th day of APRIL, 2012.



CONNIE LAWSON
SECRETARY OF STATE



JAMES J. AMMEEN, JR.
ADMINISTRATIVE LAW JUDGE