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STATE OF CALIFORNIA
BUSINESS, TRANSPORTATION AND HOUSING AGENCY
DEPARTMENT OF CORPORATIONS

TO: Boston Trading and Research, LLC
Ahmet Devrim Akyil
Craig Anthony Karlis
100 Franklin Street
Boston, MA 02110

DESIST AND REFRAIN ORDER

(For violations of sections 29520, 29535 and 29536 of the California Corporations Code)

The California Corporations Commissioner (“Commissioner”) finds that:

1. At all relevant times, Boston Trading and Research, LLC (“BTR”) is or was a Delaware limited liability company with its principal place of business located at 100 Franklin Street, Boston, Massachusetts, 02110.
2. At all relevant times, Ahmet Devrim Akyil, (“Akyil”) was a founder and President of BTR.
3. At all relevant times, Craig Anthony Karlis (“Karlis”) was a founder and Managing Director of BTR.
4. Beginning in or before January 2008, BTR, Akyil and Karlis sold, purchased, or offered to sell or purchase commodities, namely foreign currency offered through the off-exchange foreign currency (“FOREX”) markets, under commodities contracts, or offered to enter into or entered into transactions, as sellers or purchasers of commodities contracts in the State of California.
5. Through the use of marketing materials, live sales presentations and commissioned brokers and salespersons, BTR offered members of the public, including California residents, the opportunity to invest in and to purchase commodities and commodities contracts, namely foreign currency. As a result of this solicitation, California residents opened accounts and deposited funds with BTR for the purpose of purchasing and investing in commodities and commodities contracts involving foreign currency.

1 6. The foreign currency purchased or sold, or offered to be purchased or sold under commodity
2 contracts were commodities within the meaning of section 29504 of the California Commodity Law
3 of 1990 (Corporations Code sections 29500 *et seq.*).

4 7. In relation to these commodities transactions, BTR, Akyil and Karlis, directly or indirectly,
5 made untrue statements of material fact and omitted to state material facts necessary in order to make
6 the statements made, in light of the circumstances under which they were made, not misleading in
7 violation of section 29536 of the California Commodity Law of 1990. Specifically, these statements
8 and omissions included but are not limited to:

9 a. Neither BTR, Akyil, nor Karlis were registered with the Commodity Futures Trading
10 Commission;

11 b. BTR must comply with the California Commodity Law of 1990 and cannot avail itself
12 of any exceptions or exemptions under the California Commodity Law of 1990;

13 c. BTR, Akyil, and Karlis were acting as unlicensed commodities merchants in these
14 transactions in violation of section 29535 of the California Commodity Law of 1990; and,

15 d. Investor funds would be placed in highly speculative leveraged trades.

16 Based upon the foregoing, the Commissioner is of the opinion that Boston Trading and
17 Research, LLC, Ahmet Devrim Akyil and Craig Anthony Karlis sold, purchased, or offered to sell or
18 purchase commodities under commodities contracts, or offered or entered into, as sellers or
19 purchasers, commodity contracts in violation of section 29520 of the California Commodity Law of
20 1990.

21 Pursuant to section 29542 of the California Commodity Law of 1990, Boston Trading and
22 Research, LLC, Ahmet Devrim Akyil and Craig Anthony Karlis are hereby ordered to desist and
23 refrain from the further sale or purchase or offer to sell or purchase any commodity under any
24 commodity contract or under any commodity option, or offer to enter into, or enter into, as seller or
25 purchaser, any commodity contract or any commodity option, in the State of California, unless and
26 until such activity is not in violation of Corporations Code section 29520.

27 Further, the California Corporations Commissioner is of the opinion that Boston Trading and
28 Research, LLC, Ahmet Devrim Akyil and Craig Anthony Karlis engaged in business or acted as a

1 commodity merchant without being registered with the Commodity Futures Trading Commission in
2 violation of Corporations Code section 29535 of the California Commodity Law of 1990.

3 Pursuant to Corporations Code section 29542 of the California Commodity Law of 1990,
4 Boston Trading and Research, LLC, Ahmet Devrim Akyil and Craig Anthony Karlis are hereby
5 ordered to desist and refrain from engaging in business or otherwise acting as a commodity merchant
6 unless and until they are in compliance with Corporations Code Section 29535.

7 Based on the foregoing findings, the California Corporations Commissioner is also of the
8 opinion that, in connection with the offer and sale of commodities or commodities contracts, Boston
9 Trading and Research, LLC, Ahmet Devrim Akyil and Craig Anthony Karlis willfully made untrue
10 statements of material fact and omitted to state material facts necessary in order to make the
11 statements made, in light of the circumstances under which they were made, not misleading in
12 violation of section 29536 of the California Commodity Law of 1990.

13 Pursuant to section 29542 of the California Commodity Law of 1990, Boston Trading and
14 Research, LLC, Ahmet Devrim Akyil and Craig Anthony Karlis are hereby ordered to desist and
15 refrain from purchasing or selling or offering to purchase or sell commodities or commodities
16 contracts and from offering to enter into or entering into commodities contracts in the State of
17 California by employing any untrue statement of material fact or omitting to state material facts
18 necessary in order to make statements made, in light of the circumstances under which they were
19 made, not misleading.

20 This order is necessary, in the public interest, for the protection of investors and consistent
21 with the purposes, policies, and provisions of the California Commodity Law of 1990.

22 Dated: March 1, 2011
23 Los Angeles, California

24 Preston DuFauchard
25 California Corporations Commissioner

26
27 By _____
28 Alan S. Weinger
Deputy Commissioner
Enforcement Division