

1 5. Beginning in or about November 2017, Di Mora and ISN Coins offered to sell
2 commodities, in the form of gold and silver coins and precious metals, under a commodity contract,
3 to at least one California resident.

4 6. The gold and silver coins and precious metals offered to be sold, under a commodity
5 contract, were commodities within the meaning of Corporations Code section 29504 of the California
6 Commodity Law of 1990.

7 Based on the foregoing findings, the Commissioner is of the opinion that Adam Di Mora aka
8 Adam Jason Di Mora and International Silver Network aka ISN and ISN Coins offered to sell
9 commodities, in the form of gold and silver coins and precious metals, under a commodity contract,
10 to at least one California resident, in violation of Corporations Code section 29520.

11 Pursuant to Corporations Code section 29542 of the California Commodity Law of 1990,
12 Adam Di Mora aka Adam Jason Di Mora and International Silver Network aka ISN and ISN Coins
13 are hereby ordered to desist and refrain from further offer or sale of commodities under a commodity
14 contract, including but not limited to gold and silver coins and precious metals, and to desist and
15 refrain from further offering or entering to a commodity contract, in the State of California, unless
16 and until those activities are not in violation of Corporations Code section 29520.

17 Based on the foregoing findings, the Commissioner is also of the opinion that Adam Di Mora
18 aka Adam Jason Di Mora and International Silver Network aka ISN and ISN Coins engaged in a
19 trade or business or otherwise acted as a commodity merchant without registration or licensure with
20 the CFTC or were otherwise exempt, in violation of Corporations Code section 29535.

21 Pursuant to Corporations Code section 29542, Adam Di Mora aka Adam Jason Di Mora and
22 International Silver Network aka ISN and ISN Coins are hereby ordered to desist and refrain from
23 engaging in a trade or business or otherwise acting as a commodity merchant unless they are
24 registered or licensed with the CFTC for each activity constituting them as commodity merchants and
25 the registration or license shall not have expired, been suspended, or revoke; or are exempt from the
26 registration by virtue of the Commodity Exchange Act or a CFTC Rule.

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

Date: August 17, 2020

MANUEL P. ALVAREZ
Commissioner of Business Oversight

By: _____
MARY ANN SMITH
Deputy Commissioner
Enforcement Division