

1 2. According to its website, TradersFXinc.com is a “secure multi-trading platform,”
2 “[a]ll clients’ funds are held in segregated accounts, meaning completely separate from the
3 company’s account,” and “[c]lients’ funds are kept by ICC Intercertus Capital Limited in first class
4 banks.”

5 3. Beginning in at least 2019, TradersFXinc.com offered or sold securities in the form of
6 investment contracts involving options and cryptocurrency. TradersFXinc.com asserted that it trades,
7 exchanges, purchases or sells various securities for consumers’ profit through the consumers’
8 account. TradersFXinc.com represented on its website that it would give \$20 “Free” and “Pay Out An
9 Average Of \$1,570 Per Trader Each Week.” TradersFXinc.com claimed “You don't need to know
10 how to trade because we do that for you,” and that “[w]e help you earn money and only collect
11 percentage of your earnings.”

12 4. TradersFXinc.com offered and sold securities in this state in issuer transactions, but it
13 never sought, nor did the Department of Financial Protection and Innovation ever issue, a permit or
14 other form of qualification authorizing TradersFXinc.com or any person to offer or sell such
15 securities in this state.

16 5. The Corporate Securities Law of 1968 (“CSL”) defines “broker-dealer” in
17 Corporations Code section 25004 as “any person engaged in the business of effecting transactions in
18 securities in this state for the account of others or for his own account.” Section 25210, subdivision
19 (a), prohibits a broker-dealer from effecting “any transaction in, or induce or attempt to induce the
20 purchase or sale of, any security in this state unless the broker-dealer has first applied for and secured
21 from the commissioner a certificate, then in effect, authorizing that person to act in that capacity.”

22 6. TradersFXinc.com has never sought or obtained a certificate to act as a broker-dealer
23 under section 25210, or identified or noticed any exemption from the licensure requirement offered
24 by the CSL.

25 7. In connection with the offer and sale of these securities under a fictitious Avila Beach,
26 California address, TradersFXinc.com made untrue statements of material fact. An investor paid \$500
27 via Bitcoin transfer to invest with TradersFXinc.com, and in a matter of weeks TradersFXinc.com
28 falsely represented to that investor that the investment had grown to over \$73,000. TradersFXinc.com

1 then asked the investor to pay a \$1,598 management fee in response to the investor's request to
2 withdraw \$73,000, which the investor did. TradersFXinc.com then asked the investor to pay an
3 additional \$3,000 upgrade fee, which the investor declined. To date, TradersFXinc.com has neither
4 paid any investment proceeds nor returned any portion of the original investment to the investor.

5 8. Additionally, TradersFXinc.com engaged in unlicensed securities transactions. David
6 Robinson solicited a California investor to pay \$5,000 to Orlin Aguilera at Vaultradex.com, and
7 Brandon King transferred the account to TradersFXinc.com. TradersFXinc.com emailed the investor
8 to pay a "signal fee" of \$5,327.20. The California investor did not pay the signal fee, and requested to
9 be put on a "3 weeks" trading account. TradersFXinc.com represented to that investor that the
10 investment had grown to \$62,673.88. On January 27, 2021, the California investor sent
11 TradersFXinc.com a request to withdraw \$60,000, and TradersFXinc.com responded by requesting a
12 swift code. To date, TradersFXinc.com has neither paid any investment proceeds nor returned any
13 portion of the original investment to the California investor.

14 Based on the foregoing, the Commissioner finds that the securities offered and sold by
15 TradersFXinc.com, also operating as OptionsBitPro.com, Seiin Real Estate, visumoptilab.com,
16 ZeitMediaDigital.com, Vaultradex.com, and Pryaska.com (collectively referred to herein as
17 TradersFXinc.com), are subject to qualification under the CSL. These securities were offered and
18 sold without being qualified or exempt, in violation of Corporations Code section 25110.

19 Pursuant to Corporations Code section 25532, TradersFXinc.com is hereby ordered to desist
20 and refrain from the further offer or sale in California of securities, including, but not limited to
21 investment contracts involving options and cryptocurrency, unless and until qualification has been
22 made under said law or unless exempt.

23 Also, based on the foregoing findings, the Commissioner is of the opinion that
24 TradersFXinc.com is subject to the laws regulating broker-dealers under the CSL. Furthermore, the
25 Commissioner finds that it has effected transactions in, or induced or attempted to induce the
26 purchase or sale of, securities as broker-dealers, without having first applied for and secured from the
27 Commissioner a certificate authorizing it to act in that capacity in violation of Corporations Code
28 section 25210.

1 Pursuant to Corporations Code section 25532, TradersFXinc.com is hereby ordered to desist
2 and refrain from conducting business as a broker-dealer, unless and until the Commissioner certifies
3 it or it demonstrates that it is exempt from certification.

4 Further, the Commissioner is of the opinion that TradersFXinc.com offered securities, in the
5 form of investment contracts involving options and cryptocurrency, in California by written and/or
6 oral communications, and that these communications included untrue statements of material fact or
7 omissions of material facts necessary to make the statements made not misleading in violation of
8 Corporations Code section 25401.

9 Pursuant to Corporations Code section 25532, TradersFXinc.com is hereby ordered to desist
10 and refrain from offering, selling, buying, or offering to buy any security in California by means of
11 any written or oral communication that includes an untrue statement of material fact or omits a
12 material fact necessary to make the statements not misleading.

13 This Order is necessary, in the public interest, for the protection of investors and consistent
14 with the purposes, policies and provisions of the Corporate Securities Law of 1968.

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16 Dated: March 1, 2021
17 Sacramento, California

MANUEL P. ALVAREZ
Commissioner of Financial Protection and Innovation

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19 By _____
20 MARY ANN SMITH
21 Deputy Commissioner
22 Enforcement Division
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