

1 STATE OF CALIFORNIA
2 BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
3 DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION

4 TO: swift360pays.com, summittrade24.com, smartoption24.com, tradehubs24.com,
5 supergains360.com, Ikan Raymond Naeni, Markus Kunze
6 369 S 21st St
7 San Jose, CA 95116
8 support@swift360pays.com
9 support@summittrade24.com
10 support@smartoption24.com
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12 support@supergains360.com
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15 **DESIST AND REFRAIN ORDER**
16 **(For violations of Corporations Code sections 25210, 25230, 25401, 29520, and 29536)**

17 The Commissioner of Financial Protection and Innovation (Commissioner) finds that:

18 1. At all relevant times, swift360pays.com (Swift360Pays) is and was an entity of
19 unknown form and domicile maintaining a website on the internet at www.swift360pays.com. On its
20 website, Swift360Pays offers investments in cryptocurrencies, CFDs (Contracts For Differences,
21 identified by the U.S. Securities and Exchange Commission (SEC) as illegal security-based swaps),
22 and binary options. There is no record of any corporate filings in California or with the SEC, or
23 licenses with the Department of Financial Protection and Innovation (DFPI) or the SEC, for an entity
24 named Swift360Pays or swift360pays.com.

25 2. On its website, Swift360Pays identifies two purported business addresses – a
26 residence at 369 S 21st Street, San Jose, California 95116, and the incomplete and invalid address of
27 “5A Canoga Park, Carlifornia [sic], United States.” The website also provides a telephone number of
28 437-370-0368, and an email address of support@swift360pays.com. The website further indicates
that the SEC has awarded Swift360Pays “as one of the best Trading platform [sic] of 2018.” The SEC
does not endorse regulated industries or entities operating therein.

3. At all relevant times, summittrade24.com (SummitTrade24) is and was an entity of
unknown form and domicile maintaining a website on the internet at www.summittrade24.com. On

1 its website, SummitTrade24 offers investments in CFDs, cryptocurrencies, foreign currencies,
2 business investments, binary options, and ETFs (exchange traded funds). There is no record of any
3 corporate filings in California or with the SEC, or licenses with the DFPI or the SEC, for an entity
4 named SummitTrade24 or summittrade24.com.

5 4. On its website, SummitTrade24 identifies itself as summittrade24 LLC, and provides a
6 purported business location at the incomplete and invalid address of “5A Canoga Park, Carlifornia
7 [sic], United States.” The website also provides a telephone number of 623-562-1592, and an email
8 address of support@summittrade24.com.

9 5. At all relevant times, smartoption24.com (SmartOption24) is and was an entity of
10 unknown form and domicile maintaining a website on the internet at www.smartoption24.com. On its
11 website, SmartOption24 offers investments in CFDs, cryptocurrencies, foreign currencies, business
12 investments, binary options, and ETFs. There is no record of any corporate filings in California or
13 with the SEC, or licenses with the DFPI or the SEC, for an entity named SmartOption24 or
14 smartoption24.com.

15 6. On its website, SmartOption24 identifies itself as Smartoption24 LLC, and provides a
16 purported business location at the incomplete and invalid address of “5A Canoga Park,” “Carlifornia
17 [sic], United States.” The website also provides a telephone number of 442-243-3570, and an email
18 address of support@smartoption24.com.

19 7. At all relevant times, tradehubs24.com (TradeHubs24) is and was an entity of
20 unknown form and domicile maintaining a website on the internet at www.tradehubs24.com. On its
21 website, TradeHubs24 offered investments in CFDs, cryptocurrencies, foreign currencies, business
22 investments, binary options, and ETFs. There is no record of any corporate filings in California or
23 with the SEC, or licenses with the DFPI or the SEC, for an entity named TradeHubs24 or
24 tradehubs24.com.

25 8. On its website, TradeHubs24 identified itself as tradehubs24 LLC, and provided a
26 purported business location at the incomplete and invalid address of “5A Canoga Park,” “Carlifornia
27 [sic], United States.” The website also provided a telephone number of 425-247-1290, and an email
28 address of support@tradehubs24.com.

1 9. At all relevant times, supergains360.com (SuperGains360) is and was an entity of
2 unknown form and domicile maintaining a website on the internet at www.supergains360.com. On its
3 website, SuperGains360 offers investments in CFDs, cryptocurrencies, foreign currencies, business
4 investments “without loss,” binary options, and ETFs, and offers financial advising. There is no
5 record of any corporate filings in California or with the SEC, or licenses with the DFPI or the SEC,
6 for an entity named SuperGains360 or supergains360.com.

7 10. On its website, SuperGains360 identifies addresses at 20 Lonos Street, 4th Floor,
8 Flat/Office 401, 2406 Egkomi, Nicosia, Cyprus and “5A Canoga Park, CA, United States.” The
9 website also provides a telephone number of 781-656-4023, and an email address of
10 support@supergains360.com. The website further indicates that “Withdrawals are processed
11 immediately.”

12 11. On or about April 28, 2020, several residents of the Czech Republic contacted
13 Swift360pays, SummitTrade24, SmartOption24, TradeHubs24, and SuperGains360 through the
14 contact information provided on their websites seeking to invest in securities and cryptocurrencies.
15 Ikan Raymond Naeni (ikannaeni@gmail.com, 786-453-6450) and Markus Kunze
16 (markuskunze72@gmail.com, 669-237-0141) contacted these investors in reply, purportedly from a
17 branch office in Florida and a headquarters in California, respectively. There is no record of any
18 license held by Naeni or Kunze with either the DFPI or the SEC.

19 12. Naeni and Kunze solicited the investors to make payments to Swift360pays,
20 SummitTrade24, SmartOption24, TradeHubs24, and SuperGains360, purportedly for investment
21 advice and the purchase of securities and cryptocurrencies. Naeni and Kunze accepted such payments
22 and confirmed receipt of the investment funds.

23 13. On approximately January 13, 2021, the investors requested withdrawal of their
24 purported investments. In response, Naeni and Kunze made no payments and instead pressed the
25 investors for additional investments.

26 14. To date, the investors have not received any payments in return for their investments,
27 and neither Swift360pays, SummitTrade24, SmartOption24, TradeHubs24, SuperGains360, Naeni,
28

1 nor Kunze have responded to their numerous attempts to communicate and secure repayment of their
2 investments.

3 15. Neither Swift360pays, SummitTrade24, SmartOption24, TradeHubs24,
4 SuperGains360, Ikan Raymond Naeni, nor Markus Kunze has been issued a license by the
5 Commissioner authorizing any of these entities or individuals to engage in the business of a broker-
6 dealer or investment advisor under the California Corporate Securities Law (Corp. Code, §25000 et
7 seq.), nor are they exempt from the licensing requirements of Corporations Code sections 25210 and
8 25230.

9 16. By reason of the foregoing, Swift360pays, SummitTrade24, SmartOption24,
10 TradeHubs24, SuperGains360, Ikan Raymond Naeni, and Markus Kunze have:

- 11 A. (1) Acted as broker-dealers and induced or attempted to induce the purchase of
12 securities without a license, and (2) have conducted business as investment
13 advisors without a license, in violation of Corporations Code sections 25210
14 and 25230, respectively;
- 15 B. Offered to sell or purchase commodities under a commodity contract, and
16 entered into commodities contracts as a seller or purchaser, in violation of
17 Corporate Code section 29520 of the California Commodity Law of 1990
18 (Corp. Code, §29000 et seq.);
- 19 C. Offered to sell securities in this state by means of untrue statements of material
20 fact and omissions of material facts needed to make the statements not
21 misleading in violation of Corporations Code section 25401.
- 22 D. Offered to sell, purchase, or enter into contracts for commodities, or sold,
23 purchased, or entered into contracts for commodities in violation of Corporate
24 Code section 29536 by:
 - 25 i. Willfully employing a device, scheme, or artifice to defraud;
 - 26 ii. Willfully making untrue statements of material fact and/or omitting
27 material facts needed to make the statements not misleading;
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This order is necessary, in the public interest, for the protection of California investors, and is consistent with the purposes, policies, and provisions of the California Corporate Securities Law.

Dated: June 24, 2021
Sacramento, CA

CHRISTOPHER S. SHULTZ
Acting Commissioner
Department of Financial Protection and Innovation



By _____
MARY ANN SMITH
Deputy Commissioner
Enforcement Division