

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

**TO:** TLC Trading LLC d/b/a Trade Like Crazy AI and TLC Trading AI  
6/4 Abelyan St., 5th Floor, Bldg. Room 506  
Ajapnyak, Yerevan, Armenia 0078  
www.tlctrading.ai  
www.tradelikecrazy.ai

Armen Sargasyan

**DESIST AND REFRAIN ORDER**  
**(For violations of sections 25110 and 25401 of the Corporations Code)**

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

1. The Department of Financial Protection and Innovation (Department) regulates the offer and sale of securities in California under the Corporate Securities Law of 1968 (Cal. Corp. Code §§ 25000-25707) (CSL).

2. At all relevant times, TLC Trading LLC (TLC Trading) doing business as Trade Like Crazy and TLC Trading AI is and was a limited liability company incorporated in Armenia on February 16, 2024, with a purported place of business at 6/4 Abelyan St., 5th Floor, Bldg. Room 506, Ajapnyak, Yerevan, Armenia 0078. TLC Trading operated the websites www.tlctrading.ai and www.tradelikecrazy.ai, as well as social media accounts on Telegram (<https://t.me/tradelikecrazy>), X (formerly known as Twitter) (@TradeLikeCrazy), and LinkedIn (<https://www.linkedin.com/company/tlc-trading-ai>).

3. At all relevant times, an individual going by the name Armen Sargasyan (Sargasyan) held himself out as the founder and CEO of TLC Trading. Sargasyan controlled and induced or knowingly provided substantial assistance to TLC Trading within the meaning of Corporations Code section 25403, subdivisions (a) and (b).

4. Beginning at least as early as October 2023, TLC Trading offered and sold securities in the form of investment contracts in California through general solicitations on its website. TLC Trading referred to these investment contracts as “Packages.”

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1           5.       TLC Trading originally operated under the name Trade Like Crazy through its website  
2 www.tradelikecrazy.ai. TLC Trading later rebranded itself as TLC Trading and started operating  
3 through its website www.tlctrading.ai.

4           6.       TLC Trading held itself out as an “AI-powered” cryptocurrency trading platform. The  
5 purported purpose of the securities offerings was for TLC Trading to use investor funds to trade  
6 cryptocurrency, which in turn would generate returns for investors who purchased Packages.

7           7.       TLC Trading claimed that the cryptocurrency trading would be conducted by its team  
8 of 20 traders, who were “experts in crypto arbitrage, futurestrading [sic], spot trading, and scalping.”

9           8.       TLC Trading’s website had a large banner proclaiming it to be the place “WHERE  
10 DREAMS TURN INTO PROFITS.”

11          9.       According to TLC Trading, its trading had “consistently achieved awe-inspiring  
12 monthly profits ranging from 20% to an astounding 80%.” The Packages were publicly available to  
13 investors in California via TLC Trading’s websites: www.tlctrading.ai and www.tradelikecrazy.ai.

14          10.       After investors created their accounts on the TLC Trading website, investors could log  
15 into their account using their username and password to monitor their purported balance and returns,  
16 deposit funds, and request withdrawals.

17          11.       TLC Trading facilitated investor deposits and withdrawals using crypto assets.

18          12.       In his role as CEO, Sargasyan helped TLC Trading solicit investors by conducting live  
19 Zoom meetings with investors and prospective investors to promote TLC Trading’s securities. In  
20 these online presentations, Sargasyan explained TLC Trading’s purported business and described  
21 how investors could make money with TLC Trading. Additionally, Sargasyan appeared in recorded  
22 interviews and video presentations promoting TLC Trading’s securities. Recordings of Sargasyan’s  
23 Zoom presentations and promotional videos were also publicly shared by TLC Trading promoters.

24          13.       In or around June 2024, Sargasyan began claiming that TLC Trading had purchased an  
25 insurance policy from Armenia’s largest insurance company that covered all of TLC Trading’s assets.  
26 Sargasyan assured investors that this insurance policy would pay investors in the event that TLC  
27 Trading went bankrupt. Sargasyan further claimed that TLC Trading was the first company in the  
28 world to offer its investors this type of protection on their invested funds. Sargasyan even showed

1 investors a copy of the insurance policy on a video meeting with investors and prospective investors.  
2 In reality, TLC Trading’s insurance policy was a product liability policy and did not cover investor  
3 funds. Furthermore, the policy was canceled in or around June 2024 (less than one month after the  
4 policy had been issued). Even after the insurance policy was canceled, TLC Trading continued to  
5 falsely represent that investor funds were insured.

6 14. As part of its solicitation efforts, TLC Trading used a pyramid scheme structure that  
7 would reward investors for inducing others to send money to TLC Trading. According to this  
8 program, investors would be paid a referral bonus based on the amount of funds deposited by the  
9 investors that they recruited. Investors would also be paid additional referral bonuses when the  
10 investors that they recruited, in turn, recruited new investors.

11 15. Investors seeking to take advantage of TLC Trading’s referral program created and  
12 posted videos to YouTube and posted content on other social media websites to recruit others to  
13 invest in TLC Trading.

14 16. The Packages offered by TLC Trading were securities that were neither qualified nor  
15 exempt from the qualification requirement under the CSL. The Department has not issued a permit or  
16 other form of qualification authorizing TLC Trading to sell these securities in California.

17 17. In connection with the offer or sale of these securities, TLC Trading and Sargasyan  
18 made, or caused to be made, untrue statements of material fact and material omissions to investors  
19 and potential investors. This includes a false claim that TLC Trading had purchased a comprehensive  
20 insurance policy that covered “every dollar invested with us” from “all potential losses.”

21 Based on the foregoing findings, the Commissioner is of the opinion that the securities offered  
22 or sold by TLC Trading LLC d/b/a Trade Like Crazy AI and TLC Trading AI were subject to  
23 qualification under the CSL and have been or are being offered or sold without first being qualified in  
24 violation of Corporations Code section 25110.

25 Moreover, the Commissioner is of the opinion that Armen Sargasyan has violated  
26 Corporations Code section 25110 by knowingly, directly or indirectly controlling or inducing or  
27 providing substantial assistance to TLC Trading LLC d/b/a Trade Like Crazy AI and TLC Trading AI  
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1 to violate Corporations Code section 25110 within the meaning of Corporations Code section 25403,  
2 subdivisions (a) and (b).

3 Pursuant to Corporations Code section 25532, TLC Trading LLC d/b/a Trade Like Crazy AI  
4 and TLC Trading AI and Armen Sargasyan are hereby ordered to desist and refrain from the further  
5 offer or sale of securities in California, including but not limited to investment contracts known as  
6 Packages, unless and until the qualification requirements of the CSL have been met.

7 In addition, the Commissioner is of the opinion that TLC Trading LLC d/b/a Trade Like  
8 Crazy AI and TLC Trading AI offered or sold securities in California by means of oral or written  
9 communications which included untrue statements of material facts or omitted to state material facts  
10 necessary in order to make the statements made, in the light of the circumstances under which they  
11 were made, not misleading, in violation of Corporations Code section 25401.

12 Further, the Commissioner is of the opinion that Armen Sargasyan has violated Corporations  
13 Code section 25401 by knowingly, directly or indirectly controlling or inducing or providing  
14 substantial assistance to TLC Trading LLC d/b/a Trade Like Crazy AI and TLC Trading AI to violate  
15 Corporations Code section 25401 within the meaning of Corporations Code section 25403,  
16 subdivisions (a) and (b).

17 Pursuant to Corporations Code section 25532, TLC Trading LLC d/b/a Trade Like Crazy AI  
18 and TLC Trading AI and Armen Sargasyan are hereby ordered to desist and refrain from offering or  
19 selling or buying or offering to buy any security in California, including but not limited to investment  
20 contracts known as Packages, by means of any written or oral communication which includes an  
21 untrue statement of a material fact or omits to state a material fact necessary in order to make the  
22 statements made, in the light of the circumstances under which they were made, not misleading.

23 Any person who with knowledge directly or indirectly controls and induces another person to  
24 violate any provision of the CSL, or knowingly provides substantial assistance to another person to  
25 violate any provision of the CSL, is deemed to be in violation of that provision to the same extent as  
26 the other person. Cal. Corp. Code § 25403(a) and (b).

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

Dated: August 20, 2024  
San Diego, California

CLOTHILDE V. HEWLETT  
Commissioner of Financial Protection and Innovation



By \_\_\_\_\_  
MARY ANN SMITH  
Deputy Commissioner  
Enforcement Division