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ARKANSAS SECURITIES DEPT.

**BEFORE THE ARKANSAS SECURITIES COMMISSIONER
CASE NO. S-22-0045**

IN THE MATTER OF:

EXPERT-TRADING FX

RESPONDENT

REQUEST FOR CEASE AND DESIST ORDER

The Staff of the Arkansas Securities Department (“Staff”) has received information and has in its possession certain evidence indicating that Expert-Trading FX (“Expert-Trading”) has violated provisions of the Arkansas Securities Act (“Act”), Ark. Code Ann. §§ 23-42-101 through 23-42-509, and the Rules of the Arkansas Securities Commissioner (“Rules”).

ADMINISTRATIVE AUTHORITY

1. This matter is brought in connection with violations of the Act and Rules and is therefore properly before the Arkansas Securities Commissioner (“Commissioner”) in accordance with Ark. Code Ann. § 23-42-209.

RESPONDENTS

2. Expert-Trading is an online entity that claims to have expertise in cryptocurrency and binary trading. During the violative time period from on or about January 2021 until October 2022, Expert-Trading operated its business through a public website at www.expert-tradingfx.org, which as of the date of this Order is no longer accessible. The Staff obtained screenshots of certain Expert-Trading webpages prior to their removal, which are attached and incorporated by reference as Exhibit A. Expert-Trading can be served through its registrar, NameCheap, Inc., at 4600 East Washington Street, Suite 305, Phoenix, AZ 85034.
3. Expert-Trading has never been registered with the Arkansas Securities Department (“Department”) in any capacity.

4. Carolynn Gill (“Gill”) claimed to be an employee of Expert-Trading. Gill may be served through Expert-Trading’s registrar, NameCheap, Inc., at 4600 East Washington Street, Suite 305, Phoenix, AZ 85034. Gill has never been registered with the Department in any capacity.
5. An unidentifiable individual claimed to be an employee of Nino Finance, Inc. (“CoinTracker”), a legitimate business that specializes in cryptocurrency wallets as well as cryptocurrency and Bitcoin taxes. Upon further research, the Staff found no evidence that the alleged employee was affiliated with CoinTracker.
6. An unidentifiable individual claimed to be an employee of Coinbase Inc. (“Coinbase”), a legitimate business that specializes in cryptocurrency trading. Coinbase has been registered with the Department since 2014 as a licensed money transmitter pursuant to the Arkansas Uniform Money Services Act. Upon further research, the Staff found no evidence that this alleged employee was affiliated with Coinbase.
7. The Staff believes that the two above-referenced unidentifiable employees were fraudulently claiming to be affiliated with Coinbase and CoinTracker to further the deceptive scheme described herein. This Request is not a pleading against Coinbase or CoinTracker.

FACTS SUPPORTING REQUEST FOR CEASE AND DESIST ORDER

8. Expert-Trading was brought to the Staff’s attention in August 2022, when the Department received a written complaint from an Arkansas resident (“AR1”). AR1 was contacted in January 2022 by Expert-Trading’s agent, Gill, through LinkedIn about a forex Bitcoin mining opportunity. Over the next three months, AR1 was contacted and solicited for an investment opportunity through the Expert-Trading platform by Gill and the employees claiming to work for CoinTracker and Coinbase (together with Gill, collectively, “Expert-Trading Marketers”).

9. Through its website, Expert-Trading claimed that its focus was to provide its affiliates with daily and constant profits in cryptocurrency and binary markets. Expert-Trading asserted that it was a regulated foreign exchange (“forex”) broker and was an officially registered company. Upon further review, the Staff determined that Expert-Trading was not a regulated forex broker, nor was it a registered entity with any financial regulator.
10. In order to invest with Expert-Trading, customers opened an account through Expert-Trading’s website and made their first deposit based on the investment plan they selected. Expert-Trading provided the following types of investment plans:
- a. The Basic Plan that required a minimum deposit of \$500 with a 100% return.
 - b. The Classic Plan that required a minimum deposit of \$1,001 with a 120% return.
 - c. The VIP Plan that required a minimum deposit of \$5,001 with a 170% return.
 - d. The Ruby Plan that required a minimum deposit of \$10,001 with a 200% return.
 - e. The Platinum Plan that required a minimum deposit of \$25,001 with a 250% return.
 - f. The Presidential Plan that requires a minimum deposit of \$50,001 with a 300% return.
11. Expert-Trading indicated that once a customer made their initial deposit, all the customer had to do was watch their earnings grow in their account. Once the customer reached a desirable amount of profit, Expert-Trading stated that the withdrawal process would be instant and easy.
12. After reviewing Expert-Trading’s website, AR1 selected the Basic Plan and invested an initial \$500 to begin receiving profits, which was the first deposit of many made by AR1 during a three-month period from on or about January 2022 to March 2022. In total, AR1 deposited \$26,700 into the Expert-Trading platform. Of AR1’s deposited \$26,700, the

majority of the sum deposited, a total of \$26,200, went to pay for certain Expert-Trading fees and taxes before AR1 could allegedly realize a profit.

13. From the start, the Expert-Trading Marketers continuously contacted AR1, demanded AR1 deposit more funds, and delayed AR1 from withdrawing any alleged profits from their account. The Expert-Trading Marketers provided updates regarding AR1's account and the profit in the account. They also told AR1 many times that additional fees and taxes were required to be paid and certain other issues remedied (i.e., Blockchain problems and an unexplained freeze on AR1's account) prior to AR1 being allowed to make withdrawals. However, AR1 was never able to withdraw any profits and never had proof of actual profits.
14. In one such instance, AR1 was told by the Expert-Trading Marketers that to remove an unexplained freeze on AR1's account, AR1 must first pay an additional \$23,500. AR1 then became concerned that Expert-Trading was operating a scam and that the profit in AR1's account was likely fake. Subsequently, AR1 contacted the Expert-Trading Marketers to request a refund of their original invested total of \$26,700. While the Expert-Trading Marketers continued to assure AR1 that Expert-Trading was a legitimate business and not a scam, AR1 never received any returned funds from Expert-Trading, was never able to withdraw profits, and ultimately lost all of their money invested with Expert-Trading.
15. In total, AR1 lost \$26,700 through their investments in the scam operated by Expert-Trading and propagated by the Expert-Trading Marketers.
16. The Staff's review of Department records found that the investment opportunities offered by Expert-Trading and the Expert-Trading Marketers were not registered pursuant to the Act. Additionally, the Staff found no record of a filing evidencing a proof of exemption in

accordance with the Act and no notice filing pursuant to federal law in connection with a covered security.

APPLICABLE LAW

17. Ark. Code Ann. § 23-42-102(17)(A)(xi) defines “security” to include investment contracts.

18. Ark. Code Ann. § 23-42-102(10) defines “issuer” to mean every person who issues or proposes to issue any security.

19. Ark. Code Ann. § 23-42-102(1)(A)(i) defines “agent” to mean an individual, other than a broker-dealer, who represents a broker-dealer or issuer in effecting or attempting to effect purchases or sales of securities.

20. Ark. Code Ann. § 23- 42-301(a) states that it is unlawful for a person to transact business in this state as a broker-dealer or agent without first being registered pursuant to the Act.

21. Ark. Code Ann. § 23- 42-301(b)(1) states that it is unlawful for an issuer to employ an unregistered agent except a nonresident agent who is registered by any other state securities administrator and who effects transactions in Arkansas exclusively with registered broker-dealers.

22. Ark. Code Ann. § 23-42-501 states that it is unlawful for any person to offer or sell any security in this state unless: 1) it is registered under the Act; 2) the security or transaction is exempted under Ark. Code Ann. § 23-42-503 or § 23-42-504; or 3) it is a covered security.

23. Ark. Code Ann. § 23-42-507(2) states that it is unlawful for any person, in connection with the offer, sale, or purchase of any security, directly or indirectly, to make any untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they are made, not misleading.

24. Ark. Code Ann. § 23-420-507(3) states that it is unlawful for any person, in connection with the offer, sale, or purchase of any security, directly or indirectly, to engage in any act, practice, or course of business which operates or would operate as fraud or deceit upon any person.

25. Ark. Code Ann. § 23-42-209(a) states that whenever it appears to the Commissioner, upon sufficient grounds or evidence satisfactory to the Commissioner, that any person has engaged or is about to engage in any act or practice constituting a violation of any provision of the Act, the Commissioner may summarily order the person to cease and desist from the act or practice.

CONCLUSIONS OF LAW

26. The investment plans offered by Expert-Trading including the plan offered to AR1, where investors would invest monetary value into an investment plan common enterprise with a reasonable expectation of profits to be derived from the efforts of Expert-Trading, and through no efforts of the investor, were securities in the form of investment contracts under Ark. Code Ann. § 23-42-102(17)(A)(xi).

27. Expert-Trading acted as an issuer under Ark. Code. Ann. § 23-42-102(10) by engaging in the business of issuing investment contracts in the form of investment plans as described above.

28. The securities offered by Expert-Trading were not registered with the Department, exempt from registration with the Department, or covered securities under federal law. Therefore, Expert-Trading violated Ark. Code Ann. § 23-42-501 when it offered securities to AR1 through its public website.

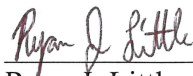
29. The Expert-Trading Marketers were employed by Expert-Trading to assist in the promotion of and the sale of the investment contracts. The Expert-Trading Marketers were acting as

- agents as defined by Ark. Code Ann. § 23-42-102(1)(A)(i) and without being properly registered as agents with the Department, in violation of Ark. Code Ann. § 23-42-301(a).
30. Expert-Trading, as an issuer, employed the Expert-Trading Marketers as unregistered agents in violation of Ark. Code Ann. § 23- 42-301(b)(1).
31. Expert-Trading and its agents, the Expert-Trading Marketers, violated Ark. Code Ann. § 23-42-507(2) by making false and misleading statements of material facts including, but not limited to, the following: promising guaranteed returns on investments in the investment plans; claiming to have expertise in the cryptocurrency and binary markets; claiming Expert-Trading was a registered entity; claiming Expert-Trading was a registered forex broker; representing that AR1's account had earned profits; saying additional fees had to be paid by AR1 before profits could be withdrawn; providing fictitious reasons why AR1's withdrawals were disallowed; and providing false information regarding the background and employment of the Expert-Trading Marketers by it and other cryptocurrency entities.
32. Expert-Trading violated Ark. Code Ann. § 23-42-507(3) by operating a website that published false and misleading statements for the purpose of soliciting investors.
33. The conduct, acts, and practices of Expert-Trading threaten immediate and irreparable public harm. A cease and desist order is in the public's interest and is appropriate in accordance with Ark. Code Ann. § 23-42-209(a).

PRAYER FOR RELIEF

WHEREFORE, the Staff respectfully requests that the Commissioner summarily order Respondents to immediately cease and desist from offering and selling fraudulent, unregistered securities to the residents of Arkansas; acting as an unregistered investment adviser; and committing fraud in the connection with the offer and sale of securities in Arkansas.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Ryan J. Little", is written over a horizontal line.

Ryan J. Little
Staff Attorney
Arkansas Securities Department

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Expert-tradingFX is a company formed by a team of PROFESSIONAL TRADERS with EXPERTISE in one of the biggest financial markets of today, the CRYPTOCURRENCY/Binary. Our focus is to provide our affiliates with daily and constant profits in these markets.

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EXHIBIT

A

**3456**

Running Days

**\$ 2620965.4708**

Total Deposited

**\$ 533171.87**

total withdrawal

**9459**

Total Accounts

**1000**

Users Online

**AUG 18, 2008**

Started Day

Become a member of

Become a member of
our company to **start growing** your funds
every day!

1000
Users Online

AUG 18, 2008
Started Day

100%
Basic Plan

- Plan Terms: Forever
- Min Deposit: \$500
- Withdrawals: Instant
- Max Deposit: \$2000

120%
Classic Plan

- Plan Terms: Forever
- Min Deposit: \$1001
- Withdrawals: Instant
- Max Deposit: \$5000

- Min Deposit: \$5001
- Max Deposit: \$10000

200%
Ruddy

- Plan Terms: For
- Withdrawals: Ins

- Min Deposit: \$25001
- Max Deposit: \$50000

300%
Presidential
Plan

- Plan Terms: I
- Withdrawals:

200

200.00

Daily Profit
\$ 1400.00

Weekly Profit
\$ 6000.00

WELCOME TO EXPERT-TRADINGFX

Expert-tradingFX is a true opportunity to earn on cryptocurrency/binary

Expert-tradingFX is a company formed by a team of PROFESSIONAL TRADERS with EXPERTISE in one of the biggest financial markets of today, the CRYPTOCURRENCY/BINARY. Our focus is to provide our affiliates with daily and constant profits in these markets.

Expert-tradingFX is an officially registered company which gives its clients all required guarantees, including confidentiality of data provided by clients at the registration process. Apart from this we guarantee accrual of requested payments in due time and amount. Our company's system, including support service, works 24 hours, which means you are always welcome to contact our experts in case you have any questions.

Expert-tradingFX is a regulated forex broker, dedicated to providing its clients with the best trading solutions, regardless of prior knowledge or experience. With Expert-tradingFX you can begin trading immediately on any of our powerful platforms. You also can withdraw your investment with our customized ATM cards.

Expert-tradingFX Features



24/7 Customer Support

We provide 24/7 customer support through e-mail. Our support representatives are always available to answer any questions.



Dedicated Server

We use a dedicated server with the highest level of DDoS protection to ensure that your funds are always safe with us.



EV SSL

Our website is secured with 256-bit encryption from Comodo with Extended Validation that verifies the authenticity of our company.



Registered Company

Our company is legally registered in the Europe as "Expert-tradingFX LTD".



Instant Withdrawals

Our withdrawals are all processed instantly after they are requested. Minimum



DDoS Protected System

We use the highest level of protection. Our website can resist attacks of any size.

Forex Trading for Beginners #1: What is Forex tr...

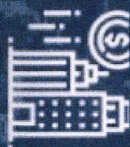
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What is
Forex
Trading

Watch on YouTube

Trading with Rayner

Our company is legally registered in the
Europe as "Expert-tradingFX LTD".



Registered Company

Our company is legally registered in the
Europe as "Expert-tradingFX LTD".

Our withdrawals are all processed instantly
after they are requested. Minimum



Instant Withdrawals

Our withdrawals are all processed instantly
after they are requested. Minimum
withdrawal is only \$2.

We use the highest level of protection. Our
website can resist attacks of any size.



DDoS Protected System




We use the highest level of protection. Our
website can resist attacks of any size.

st Deposits

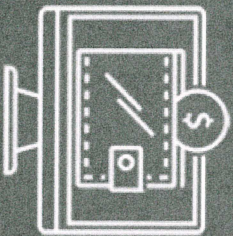
\$500.00		
\$350.00		
\$450.00		
\$550.00		
moparttrader	\$3000.00	
trevat	\$800.00	
naeem786	\$400.00	
raju	\$1000.00	
sosgamez	\$4000.00	
tailgods	\$1500.00	
naeem786	\$400.00	
slognat	\$1000.00	
sosgamez	\$450.59	

Latest Withd

laurent	\$41000	
Nizambic	\$7500	
righteous	\$930	
revised	\$2300	
shadowman	\$3700.60	
Vidmantas	\$52000.00	
Adjeiwolako1983	\$4900.00	
osman007	\$1000.00	
Magnata	\$4900.00	
eycofcu	\$9000.00	
shadowman	\$6000.60	
Vidmantas	\$5000.00	
Adjeiwolako1983	\$20000.00	

Tailgods	\$300.00	
Tailgods	\$600.00	
Tailgods	\$350.00	

onus mission n new member makes a deposit of 6%.















\$22,989
(0.04%)



Bitcoin
BTC/USD



	Exchange	Pair	Price
	Binance	BTC / USDT	\$23.023
			\$3,736,447,500
	Currency.com	BTC / USD	\$22.960
			\$102,169,039
	Digifinex	BTC / USDT	\$22.981
			\$502,722,168
	Binance	BTC / BUSD	\$22.968
			\$1,324,057,139
	Dcoin	BTC / USDT	\$22.983
			\$198,179,621
	WhiteBIT	ETH / BTC	\$22.982
			\$53,386,004

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Perfect Money

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Your Full Name

Your E-mail Address

Your Username

Reset Your E-mail

Secret Question

Secret Answer

Enter Password

Repeat Password

To open an account, simply click on the "Register New Account" button on the main page. The next page is the registration form that you need to fill out. This shouldn't take more than a few minutes. Once you've done that, you'll receive an email confirmation from us, and you're done. You are now an official member of our site!

OPEN AN ACCOUNT

LOGIN TO MEMBER'S AREA

Once you've opened an account, the next thing would be to familiarize yourself with how different sections of your account works. To start, go to the login page and enter your registration username and chosen password. After you are logged in, you can explore your account and get a feel of how everything works, such as making deposits, requesting withdrawals, etc.

Username

Password

Remember Password

LOGIN

10%
Daily Profit

Plan Terms: Forever
Withdrawals: Instant
Min Deposit: \$20
Max Deposit: \$100

15%
Daily Profit

Plan Terms: Forever
Withdrawals: Instant
Min Deposit: \$500
Max Deposit: \$100

To start growing your funds, you need to make a deposit. You can do this from the deposit section of your account. There are 6 investment plans ranging from 10%-30% daily depending on the amount of your deposit. The minimum deposit amount is \$20, and you are allowed to make as many deposits as you want. However, every deposit is treated as a separate investment.

MAKE YOUR FIRST DEPOSIT

YOUR ACCOUNT BALANCE: 0.00 BTC

REQUEST WITHDRAWALS

It only takes a few seconds to make your withdrawals and have your earnings paid to you. All of our withdrawals are instant, and your withdrawal will be sent to the wallet and account address you provided during registration.

Your Bitcoin Account

You have no funds to withdraw.

REFER YOUR FRIENDS

You don't need an active deposit to take advantage of our referral program. As long as you are a registered member, you only need to use your personal affiliate link from your member's area and share it with your friends. You will get rewarded as soon as they join and make their first deposit!

Referrals:

Active Referrals:

Total Referral Commission:


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From:

Aug

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2018



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Affiliate Program

Even if you do not make a deposit to our program, it is still possible to earn with Expert-tradingfx! You can still take part in our referral program which offers a 2-level referral commission of 6% - 2%. That means you earn 6% of the deposit for any member who joins us through your referral link. If that member refers a new member who makes a deposit, you will earn 2% of that new member's deposit. Your referral commission is always immediately credited to your account and can be withdrawn instantly!



HOW TO START EARNING

To start referring members with our referral program, simply register a new account by clicking on the "Register" link. After signing up, log in to your member's area and you will see your referral link with your username. Use this link to promote our program and start earning referral commission!



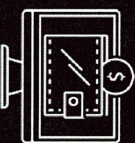
REFERRAL TOOLS

We give you the tools you need to advertise our program! To use our banner links, log in to your account and click "Banners" on the user menu. There you will find banners of different size with code underneath. All of the banner codes already have your referral link included. Use these banners to promote our program, and you will earn a referral bonus from any member who makes a deposit!

6% Referral Bonus

Level 1 Referral Commission

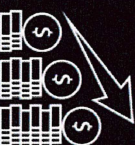
We offer 6% referral bonus for each new member you invite to our program. After he makes a deposit you receive a referral commission of 6%.



2% Referral Bonus

Level 2 Referral Commission

We offer an extra bonus of 2% for any new member who is invited by your referral. After he makes a deposit you receive a referral commission of 2%.



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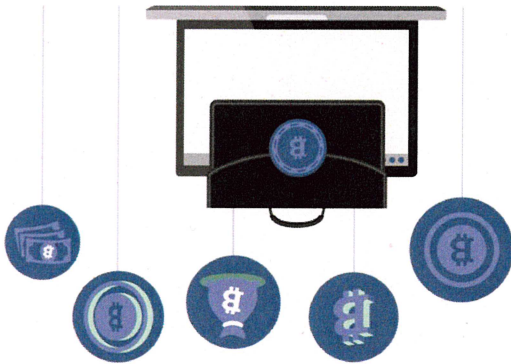
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WELCOME TO EXPERT-TRADINGFX

Expert-tradingfx is a true opportunity to earn on cryptocurrency/binary. Nowadays cryptocurrency/binary is one of the main payment instruments, which can be used online. Expert-tradingfx has been using this kind of digital payment for quite a while to gain and raise profit.

Expert-tradingfx is an officially registered company which gives its clients all required guarantees, including confidentiality of data provided by clients at the registration procedure. Apart from this we guarantee accrual of requested payments in due time and full amount. The company's system, including support service, works 24 hours, which means you are always welcome to contact our experts in case you have any questions.

Expert-tradingfx provides its clients with an opportunity to invest money into mining farms located all around the world to obtain quite a big income later, which can be done even without client's direct participation. The company actively uses trading bots on digital currency stock-markets, which is very convenient and profitable. We also try to attract new partners and share our experience with the like-minded people all over the world.



Expert-tradingfx Features

24/7 Customer Support



We provide 24/7 customer support through e-mail. Our support representatives are always available to answer any questions.

Seychelles Registered Company



Our company is legally registered in the Seychelles as Expert-tradingfx MINING TECHNOLOGIES, LTD.

Dedicated Server



We use a dedicated server with the highest level of DDOS protection to ensure that your funds are always safe with us.

Instant Withdrawals



Our withdrawals are all processed instantly after they are requested. Minimum withdrawal is only \$2.

DDOS Protected System



We use the highest level of protection. Our website can resist attacks of any size.

EV SSL



Our website is secured with 256-bit encryption from Comodo with Extended Validation that verifies the authenticity of our company.

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