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Texas State Securities Board

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MEMBER

IN THE MATTER OF
WIND WIDE COIN AKA WWC INC., CHARLES
ROMAN, FRED ANDREW AND JOHN ANNY

§
§ **Order No. ENF-18-CDO-1764**
§

TO: WIND WIDE COIN AKA WWC, INC.
5015 Mitchelldale, Suite #120, Houston, Texas 77082, and
RF 12, Lake City, Florida 32025

CHARLES ROMAN
5015 Mitchelldale, Suite #120, Houston, Texas 77082, and
RF 12, Lake City, Florida 32025

FRED ANDREW
5015 Mitchelldale, Suite #120, Houston, Texas 77082, and
RF 12, Lake City, Florida 32025

JOHN ANNY
5015 Mitchelldale, Suite #120, Houston, Texas 77082, and
RF 12, Lake City, Florida 32025

EMERGENCY CEASE AND DESIST ORDER

This is your OFFICIAL NOTICE of the issuance by the Securities Commissioner of the State of Texas (hereinafter referred to as "**Securities Commissioner**") of an EMERGENCY CEASE AND DESIST ORDER pursuant to Section 23-2 of The Securities Act, TEX. REV. CIV. STAT. ANN. arts. 581-1 to 581-45 (West 2010 & Supp. 2017) (hereinafter referred to as "**Securities Act**").

The Enforcement Division of the Texas State Securities Board has presented evidence sufficient for the Securities Commissioner to find that:

FINDINGS OF FACT

1. Wind Wide Coin aka WWC Inc. (hereinafter referred to as "**Respondent Wind Wide Coin**") purports to maintain addresses at 5015 Mitchelldale, Suite #120, Houston, Texas 77082, and RF 12, Lake City, Florida 32025.

2. Charles Roman (hereinafter referred to as “**Respondent Roman**”) is the Manager of Investment for Respondent Wind Wide Coin. He can be served with process at 5015 Mitchelldale, Suite #120, Houston, Texas 77082, and RF 12, Lake City, Florida 32025.
3. Fred Andrew (hereinafter referred to as “**Respondent Andrew**”) is a sales agent for Respondent Wind Wide Coin. He can be served with process at 5015 Mitchelldale, Suite #120, Houston, Texas 77082, and RF 12, Lake City, Florida 32025.
4. John Anny (hereinafter referred to as “**Respondent Anny**”) is a sales agent for Respondent Wind Wide Coin. He can be served with process at 5015 Mitchelldale, Suite #120, Houston, Texas 77082, and RF 12, Lake City, Florida 32025.

BACKGROUND

5. Respondent Wind Wide Coin maintains an internet website accessible by the public at <https://www.windwidecoin.com> (hereinafter referred to as the “**Wind Wide Coin Website**”).
6. The Wind Wide Coin Website represents Respondent Wind Wide Coin “believe[s] in complete transparency,” that it “believe[s] frauds and scams harms [sic] bitcoin as a whole” and that it has “strong moral values and would never steal or cheat anyone.”
7. The Wind Wide Coin Website describes Respondent Wind Wide Coin as a “legally registered” company even though Respondent Wind Wide Coin has not filed with the Texas Secretary of State and is not authorized to transact business in Texas as a domestic or foreign corporation.
8. The Wind Wide Coin Website represents Respondent Wind Wide Coin maintains an address at 5015 Mitchelldale, Suite #120, Houston, Texas 77082, even though this street address does not exist.

THE OFFER OF INVESTMENTS IN A CRYPTOCURRENCY TRADING PROGRAM

9. The Wind Wide Coin Website describes Respondent Wind Wide Coin as a company that employs “bitcoin and ethereum trading professionals” and that uses an “automatic trading bot” to offer “a highly profitable investment for everyone.”
10. The Wind Wide Coin Website offers potential investors the opportunity to purchase investments in its cryptocurrency trading program.
11. The Wind Wide Coin Website provides that returns paid to investors are contingent upon the amount of their principal deposit, not the success of the automatic trading bot or the bitcoin and ethereum trading professionals. The Wind Wide Coin Website defines the returns as follows:

- A. Investors can invest a minimum of 0.05 Bitcoin in the “Baby” plan and receive a payment of 0.1 Bitcoin after a term of twelve hours,
 - B. Investors can invest a minimum of 0.10 Bitcoin in the “Standard” plan and receive a payment of 1.00 Bitcoin after a term of twenty-four hours,
 - C. Investors can invest a minimum of 0.50 Bitcoin in the “Premium” plan and receive a payment of 2.00 Bitcoin after a term of two days,
 - D. Investors can invest a minimum of 1.00 Bitcoin in the “X-Boost” plan and receive a payment of 4.00 Bitcoin after a term of four days, and
 - E. Investors can invest a minimum of 2.00 Bitcoin in the “Ultimate” plan and receive a payment of 8.00 Bitcoin after a term of seven days.
12. Respondents are touting the security of investment in the cryptocurrency trading program. They are claiming as follows:
- A. Respondent Wind Wide Coin and Respondent Roman, acting through a sales agent, are telling potential investors they “will get income” and it is “100% sure,”
 - B. Respondent Wind Wide Coin and Respondent Roman, acting through Respondent Andrew, are stating that “there is no risk” and “everything is 100% secure,” and
 - C. Respondent Wind Wide Coin and Respondent Roman, acting through Respondent Anny, are asserting that investors “can’t lose money” and that Wind Wide Coin “is a company so your investment is safe.”
13. Respondent Wind Wide Coin and Respondent Roman, acting through Respondent Anny, are telling investors that Respondent Wind Wide Coin does not need a license to operate.
14. The Wind Wide Coin Website has been publishing photographs of people that purport to be clients of Respondent Wind Wide Coin, providing false names for these purported clients, and attributing testimonials to these purported clients. These testimonials include the following:
- A. The Wind Wide Coin Website has been publishing a photograph of Charles Philip Arthur George, the Prince of Wales and Earl of Chester, falsely identifying him as “Mark Robert,” and promoting a testimonial that claims he is a client of Respondent Wind Wide Coin. The Wind Wide Coin Website now provides a photograph of “Johnson Smith,” and his testimonial is a verbatim reproduction of the testimonial purportedly from Prince Charles,
 - B. The Wind Wide Coin Website has been publishing a photograph of actress Jennifer Aniston, falsely identifying her as “Kate Jennifer,” and promoting a

testimonial that claims she is a client of Respondent Wind Wide Coin. The Wind Wide Coin Website now provides a photograph of “Edwin Allli,” and his testimonial is a verbatim reproduction of the testimonial purportedly from Ms. Aniston, and

- C. The Wind Wide Coin Website has been publishing a photograph of Matti Taneli Vanhanen, the former Prime Minister of Finland, falsely identifying him as “Niinistö Ann,” and promoting a testimonial that claims he is a client of Respondent Wind Wide Coin. The Wind Wide Coin Website now provides a photograph of “Davis Lucas,” and his testimonial is a verbatim reproduction of the testimonial purportedly from Prime Minister Vanhanen.

REGISTRATION VIOLATIONS

- 15. Respondent Wind Wide Coin has not been registered with the Securities Commissioner as a dealer at any time material hereto.
- 16. Respondent Roman, Respondent Andrew, and Respondent Anny have not been registered with the Securities Commissioner as agents of Respondent Wind Wide Coin at any time material hereto.
- 17. The investments in the cryptocurrency trading program have not been registered by qualification, notification or coordination, and no permit has been granted for their sale in Texas.

FRAUD IN CONNECTION WITH THE OFFER OF INVESTMENTS IN THE CRYPTOCURRENCY TRADING PROGRAM

- 18. In connection with the offer of investments in the cryptocurrency trading program, Respondents are intentionally failing to disclose the following material facts:
 - A. Respondents are intentionally failing to disclose the identity and background of the principals of Respondent Wind Wide Coin,
 - B. Respondents are intentionally failing to disclose sufficient information for investors to evaluate the business repute and qualifications of the principals of Respondent Wind Wide Coin,
 - C. Respondents are intentionally failing to disclose the assets, liabilities, and capitalization of Respondent Wind Wide Coin, and
 - D. Respondents are intentionally failing to disclose the principal place of business of Respondent Wind Wide Coin.
- 19. In connection with the offer of investments in the cryptocurrency trading program, Respondent Wind Wide Coin is representing that it is a “licensed company,” is using a corporate designation and is claiming to maintain an address at 5015

Mitchelldale, Suite #120, Houston, Texas 77082. These statements constitute misrepresentations of relevant facts because:

- A. Respondent Wind Wide Coin has not filed with the Texas Secretary of State and is not authorized to do business in Texas as a domestic or foreign corporation,
- B. Respondent Wind Wide Coin does not maintain an address at 5015 Mitchelldale, Suite #120, Houston, Texas 77082, and
- C. The street address identified as 5015 Mitchelldale, Suite #120, Houston, Texas 77082, does not exist.

MISLEADING AND DECEPTIVE STATEMENTS AND
THE OFFER OF INVESTMENTS IN THE CRYPTOCURRENCY TRADING PROGRAM

- 20. Respondents are promising that investors will be paid considerable profits while being exposed to little or no risk, which is materially misleading or otherwise likely to deceive the public because they are not disclosing the risks associated with investments in the cryptocurrency trading program, including the following risks:
 - A. Governments may adopt legislation or regulations that may negatively impact the use, transfer, exchange, or price of cryptocurrencies,
 - B. Cryptocurrencies are volatile and the price of a cryptocurrency, as it relates to fiat currency and to other cryptocurrencies, may decrease over a short period of time resulting in significant loss to purchasers or traders of the cryptocurrency,
 - C. A system failure, technical failure, or deficient source code may negatively impact the ability to exchange cryptocurrencies and the price of cryptocurrencies,
 - D. A hacking incident or malicious attack may negatively impact the price of cryptocurrencies,
 - E. Transaction fees relating to the exchange of cryptocurrencies are volatile and differ significantly between exchanges for the same cryptocurrency, which may negatively impact the profitability of a trade, and
 - F. Cryptocurrencies compete with all other cryptocurrencies, and this competition may negatively impact the price of a specific cryptocurrency.
- 21. Respondents are representing that an investment in the cryptocurrency trading program will provide investors with a fixed return over a fixed term, which is materially misleading or otherwise likely to deceive the public because:

- A. Respondents are not disclosing any material information about Respondent Wind Wide Coin's methodology for trading cryptocurrencies in a manner that will generate a fixed return over a fixed term, and
 - B. Respondents are not disclosing any information about the source of funds that will be used to pay investors fixed returns at the conclusion of the fixed terms if the methodology used to trade cryptocurrencies fails to generate the necessary profits.
22. Respondents Wind Wide Coin, Roman and Anny are telling investors that Respondent Wind Wide Coin does not need a license to operate, which is materially misleading or otherwise likely to deceive the public because Respondent Wind Wide Coin must be registered with the Securities Commissioner as a dealer before offering investments in the cryptocurrency trading program in Texas.
23. Respondent Wind Wide Coin is publishing photographs of people who purport to be clients of Respondent Wind Wide Coin, falsely identifying these purported clients by name and promoting testimonials from these purported clients. The use of these photographs, names, and testimonials is materially misleading or otherwise likely to deceive the public because:
- A. The Wind Wide Coin Website has been publishing a photograph of Charles Philip Arthur George, the Prince of Wales and Earl of Chester, falsely identifying him as "Mark Robert," and promoting a testimonial that claims he is a client of Respondent Wind Wide Coin. The Wind Wide Coin Website now provides a photograph of "Johnson Smith," and his testimonial is a verbatim reproduction of the testimonial purportedly from Prince Charles,
 - B. The Wind Wide Coin Website has been publishing a photograph of actress Jennifer Aniston, falsely identifying her as "Kate Jennifer," and promoting a testimonial that claims she is a client of Respondent Wind Wide Coin. The Wind Wide Coin Website now provides a photograph of "Edwin Allli," and his testimonial is a verbatim reproduction of the testimonial purportedly from Ms. Aniston, and
 - C. The Wind Wide Coin Website has been publishing a photograph of Matti Taneli Vanhanen, the former Prime Minister of Finland, falsely identifying him as "Niinistö Ann," and promoting a testimonial that claims he is a client of Respondent Wind Wide Coin. The Wind Wide Coin Website now provides a photograph of "Davis Lucas," and his testimonial is a verbatim reproduction of the testimonial purportedly from Prime Minister Vanhanen.
24. Respondent Wind Wide Coin and Respondent Roman are representing they "believe in complete transparency," they "believe frauds and scams harms [sic] bitcoin as a whole" and they have "strong moral values and would never steal or cheat anyone," which is materially misleading or otherwise likely to deceive the public because Respondents are engaging in fraud and making an offer containing

statements that are materially misleading or otherwise likely to deceive the public as described herein.

CONCLUSIONS OF LAW

1. The investments in the cryptocurrency trading program are “securities” as that term is defined in Section 4.A of the Securities Act.
2. Respondents are violating Section 7 of the Securities Act by offering securities for sale in Texas at a time when the securities are not registered with the Securities Commissioner.
3. Respondents are violating Section 12 of the Securities Act by offering securities for sale in Texas without being registered pursuant to the provisions of Section 12 of the Securities Act.
4. Respondents are engaging in fraud in connection with the offer for sale of securities.
5. Respondents are making offers containing statements that are materially misleading or otherwise likely to deceive the public.
6. Respondents’ conducts, acts, and practices threaten immediate and irreparable harm.
7. The foregoing violations constitute bases for the issuance of an Emergency Cease and Desist Order pursuant to Section 23-2 of the Securities Act.

ORDER

1. It is therefore ORDERED that Respondents immediately CEASE AND DESIST from offering for sale any security in Texas until the security is registered with the Securities Commissioner or is offered for sale pursuant to an exemption from registration under the Securities Act.
2. It is further ORDERED that Respondents immediately CEASE AND DESIST from acting as securities dealers or agents in Texas until they are registered with the Securities Commissioner or are acting pursuant to an exemption from registration under the Securities Act.
3. It is further ORDERED that Respondents immediately CEASE AND DESIST from engaging in any fraud in connection with the offer for sale of any security in Texas.
4. It is further ORDERED that Respondents immediately CEASE AND DESIST from offering securities in Texas through an offer containing a statement that is materially misleading or otherwise likely to deceive the public.

NOTICE

Pursuant to Section 23-2 of the Securities Act, you may request a hearing before the 31st day after the date you were served with this Order. The request for a hearing must be in writing, directed to the Securities Commissioner, and state the grounds for the request to set aside or modify the Order. Failure to request a hearing will result in the Order becoming final and non-appealable.

You are advised under Section 29.D of the Securities Act that any knowing violation of an order issued by the Securities Commissioner under the authority of Section 23-2 of the Securities Act is a criminal offense punishable by a fine of not more than \$5,000, or imprisonment in the penitentiary for not more than two years, or by both such fine and imprisonment.

SIGNED AND ENTERED by the Securities Commissioner this 15th day of May, 2018.



TRAVIS J. ILES
Securities Commissioner