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SECURITIES COMMISSIONER



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## Texas State Securities Board

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ROBERT BELT  
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IN THE MATTER OF	§
PROACTIVE EXPERT TRADING; RELIABLE MINERS;	§
BITCOIN FX OPTIONS AKA BITCOINFX OPTIONS;	§
SURE TRADE EARNINGS; CRYPTOTRADEFXWAY	§
AKA CRYPTOTRADE FX WAY; PROACTIVE	§
EXPERTTRADE; RELIABLEFX INTERNAL TRADE;	§
MAXFX INTERNAL TRADE; ANTPOOLTOP MINING;	§
EXPERTTRADE247 AND JAMES BLUNDELL	§

**Order No.  
ENF-20-CDO-1824**

### PROACTIVE EXPERT TRADING

Service by certified mail, return receipt requested, addressed to (1) 5452 Detroit, Texas; (2) care of Privacy Protect, LLC, the Registrant, Technical Contact and Administrative Contact for its website, at 10 Corporate Drive, MA 01803; (2) care of Hostinger UAB, the Registrar of its website, at Jonavos g. 60C, 44192, Kuanas, Lithuania, and 61 Lordou Vironos Street, 6023 Larnaca, Cyprus; (3) 3520 Nasa Parkway, Seabrook, Texas 77586; and (4) 1120 Clay Road, Houston, Texas 77041.

### RELIABLE MINERS

Service by certified mail, return receipt requested, addressed to (1) 857 Main Street, 102 Avenue, Washington, DC; (2) care of Privacy Protect, LLC, the Registrant, Technical Contact and Administrative Contact for its website, at 10 Corporate Drive, MA 01803; (3) care of Hostinger UAB, the Registrar of its website, at Jonavos g. 60C, 44192, Kuanas, Lithuania, and 61 Lordou Vironos Street, 6023 Larnaca, Cyprus; (4) 3520 Nasa Parkway, Seabrook, Texas 77586; and (5) 1120 Clay Road, Houston, Texas 77041.

### BITCOIN FX OPTIONS AKA BITCOINFX OPTIONS

Service by certified mail, return receipt requested, addressed to (1) care of Privacy Protect, LLC, the Registrant, Technical Contact and Administrative Contact for its website, at 10 Corporate Drive, MA 01803; (2) care of Hostinger UAB, the Registrar of its website, at Jonavos g. 60C, 44192, Kuanas, Lithuania, and 61 Lordou Vironos Street, 6023 Larnaca, Cyprus; (3) 3520 Nasa Parkway, Seabrook, Texas 77586; and (4) 1120 Clay Road, Houston, Texas 77041.

### SURE TRADE EARNINGS

Service by certified mail, return receipt requested, addressed to (1) 5452 Detroit, Texas; (2) care of Privacy Protect, LLC, the Registrant, Technical Contact and Administrative Contact for its website, at 10 Corporate Drive, MA 01803; (3) care of Hostinger UAB, the Registrar of its website, at Jonavos g. 60C, 44192, Kuanas, Lithuania, and 61 Lordou

Vironos Street, 6023 Larnaca, Cyprus; (4) 3520 Nasa Parkway, Seabrook, Texas 77586; and (5) 1120 Clay Road, Houston, Texas 77041.

#### CRYPTOTRADEFXWAY AKA CRYPTOTRADE FX WAY

Service by certified mail, return receipt requested, addressed to (1) Tower 12, 18-22 Bridge Street, Deansgate, Manchester, United Kingdom; (2) care of Privacy Protect, LLC, the Registrant, Technical Contact and Administrative Contact for its website, at 10 Corporate Drive, MA 01803; (3) care of Hostinger UAB, the Registrar of its website, at Jonavos g. 60C, 44192, Kuanas, Lithuania, and 61 Lordou Vironos Street, 6023 Larnaca, Cyprus; (4) 3520 Nasa Parkway, Seabrook, Texas 77586; and (5) 1120 Clay Road, Houston, Texas 77041.

#### PROACTIVE EXPERTTRADE

Service by certified mail, return receipt requested, addressed to (1) care of WhoisGuard, Inc., the Registrant, Technical Contact and Administrative Contact for its website, at P.O. Box 0823-03411 Panama PA; (2) care of Namecheap, Inc., the Registrar of its website, at 4600 East Washington Street, Suite 305, Phoenix, Arizona 90064; (3) 3520 Nasa Parkway, Seabrook, Texas 77586; and (4) 1120 Clay Road, Houston, Texas 77041.

#### RELIABLEFX INTERNAL TRADE

Service by certified mail, return receipt requested, addressed to (1) 27 Colmore Row, Birmingham, United Kingdom; (2) care of WhoisGuard, Inc., the Registrant, Technical Contact and Administrative Contact for its website, at P.O. Box 0823-03411 Panama PA; (3) care of Namecheap, Inc., the Registrar of its website, at 4600 East Washington Street, Suite 305, Phoenix, Arizona 90064; (4) 3520 Nasa Parkway, Seabrook, Texas 77586; and (5) 1120 Clay Road, Houston, Texas 77041.

#### MAXFX INTERNAL TRADE

Service by certified mail, return receipt requested, addressed to (1) 17216 Lafayette Trails Drive, Glenco, Missouri 63038; (2) care of WhoisGuard, Inc., the Registrant, Technical Contact and Administrative Contact for its website, at P.O. Box 0823-03411 Panama PA; (3) care of Namecheap, Inc., the Registrar of its website, at 4600 East Washington Street, Suite 305, Phoenix, Arizona 90064; (4) 3520 Nasa Parkway, Seabrook, Texas 77586; and (5) 1120 Clay Road, Houston, Texas 77041.

#### ANTPOOLTOP MINING

Service by certified mail, return receipt requested, addressed to (1) 9111 Cross Park Drive, Suite D100, Knoxville, Nashville Tennessee; (2) care of Privacy Protect, LLC, the Registrant, Technical Contact and Administrative Contact for its website, at 10 Corporate Drive, MA 01803; (3) PDR Ltd. dba PublicDomainRegistry.com, the Registrar of its website, at 501 IT Building No. 3, NESCO IT Park, NESCO Complex, Western Express Highway, Goregaon (East), Mumbia – 400063, Maharashtra, India; (4) 3520 Nasa Parkway, Seabrook, Texas 77586; and (5) 1120 Clay Road, Houston, Texas 77041.

#### EXPERTTRADES247

Service by certified mail, return receipt requested, addressed to (1) 5421 Houston Texas; (2) care of WhoisGuard, Inc., the Registrant, Technical Contact and Administrative Contact for its website, at P.O. Box 0823-03411 Panama PA; (3) care of Namecheap,

Inc., the Registrar of its website, at 4600 East Washington Street, Suite 305, Phoenix, Arizona 90064; (4) 3520 Nasa Parkway, Seabrook, Texas 77586; and (5) 1120 Clay Road, Houston, Texas 77041.

JAMES BLUNDELL

Service by certified mail, return receipt requested, addressed to (1) 3520 Nasa Parkway, Seabrook, Texas 77586; and (2) 1120 Clay Road, Houston, Texas 77041.

### **EMERGENCY CEASE AND DESIST ORDER**

This is your OFFICIAL NOTICE of the issuance by the Securities Commissioner of the State of Texas ("**Securities Commissioner**") of an EMERGENCY CEASE AND DESIST ORDER pursuant to Section 23-2 of The Securities Act, Tex. Rev. Civ. Stats. Ann. arts. 581-1-581-45 (the "**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. The respondents are engaging in an illegal internet scheme to advertise, hype and sell fraudulent cryptocurrency investments.
2. In furtherance of the scheme, James Blundell is broadly soliciting victims through numerous social media platforms.
3. To add legitimacy to the scheme, James Blundell is using a forged driver license that falsely purports to be issued by Texas and a forged trading license that falsely purports to be issued by Texas City, Texas.
4. James Blundell and the other respondents are also concealing highly material information, such as the identity of their principals and their business plans and strategies for actually earning profits. Many parties are also using phony or non-existent addresses or otherwise concealing their actual location.
5. The Securities Commissioner is entering this Emergency Cease and Desist Order to stop the illegal and fraudulent securities offering and protect Texans from immediate and irreparable harm.

#### **RESPONDENT PROACTIVE EXPERT TRADING**

6. Proactive Expert Trading ("**Respondent Proactive Expert Trading**") maintains a website accessible at [www.proactiveexperttrading.com](http://www.proactiveexperttrading.com) (the "**Proactive Expert Trading Website**").
7. The Proactive Expert Trading Website represents its address is 5452 Detroit, Texas.

8. Privacy Protect, LLC, is the Registrant, Technical Contact and Administrative Contact for the Proactive Expert Trading Website, and its address is 10 Corporate Drive, MA 01803.
9. Hostinger UAB is the Registrar of the Proactive Expert Trading Website and its address is Jonavos g. 60C, 44192, Kuanas, Lithuania, and 61 Lordou Vironos Street, 6023 Larnaca, Cyprus.
10. Respondent Proactive Expert Trading is also being served at addresses associated with Respondent Blundell at 3520 Nasa Parkway, Seabrook, Texas 77586, and 1120 Clay Road, Houston, Texas 77041.

#### RESPONDENT RELIABLE MINERS

11. Reliable Miners ("**Respondent Reliable Miners**") maintains a website accessible at reliableminers.com (the "**Reliable Miners Website**").
12. The Reliable Miners Website represents its address is 857 Main Street, 102 Avenue, Washington, DC.
13. Privacy Protect, LLC, is the Registrant, Technical Contact and Administrative Contact for the Reliable Miners Website, and its address is 10 Corporate Drive, MA 01803.
14. Hostinger UAB is the Registrar of the Reliable Miners Website and its address is Jonavos g. 60C, 44192, Kuanas, Lithuania, and 61 Lordou Vironos Street, 6023 Larnaca, Cyprus.
15. Respondent Reliable Miners is also being served at addresses associated with Respondent Blundell at 3520 Nasa Parkway, Seabrook, Texas 77586, and 1120 Clay Road, Houston, Texas 77041.

#### RESPONDENT BITCOINFX OPTIONS

16. Bitcoin FX Options aka BitcoinFX Options ("**Respondent BitcoinFX Options**") maintains a website accessible at bitcoinfxoptions.com (the "**BitcoinFX Options Website**").
17. The BitcoinFx Options Website represents its address is Wall Street, New York, United States.
18. Privacy Protect, LLC, is the Registrant, Technical Contact and Administrative Contact for the BitcoinFX Options Website, and its address is 10 Corporate Drive, MA 01803.
19. Hostinger UAB is the Registrar of the BitcoinFX Options Website and its address is Jonavos g. 60C, 44192, Kuanas, Lithuania, and 61 Lordou Vironos Street, 6023 Larnaca, Cyprus.

20. Respondent BitcoinFX Options is also being served at addresses associated with Respondent Blundell at 3520 Nasa Parkway, Seabrook, Texas 77586, and 1120 Clay Road, Houston, Texas 77041.

#### RESPONDENT SURE TRADE EARNINGS

21. Sure Trade Earnings ("**Respondent Sure Trade Earnings**") maintains a website accessible at suretradeearnings.com (the "**Sure Trade Earnings Website**").
22. The Sure Trade Earnings Website represents its address is 5452 Detroit, Texas.
23. Privacy Protect, LLC, is the Registrant, Technical Contact and Administrative Contact for the Sure Trade Earnings Website, and its address is 10 Corporate Drive, MA 01803.
24. Hostinger UAB is the Registrar of the Sure Trade Earnings Website and its address is Jonavos g. 60C, 44192, Kuanas, Lithuania, and 61 Lordou Vironos Street, 6023 Larnaca, Cyprus.
25. Respondent Sure Trade Earnings is also being served at addresses associated with Respondent Blundell at 3520 Nasa Parkway, Seabrook, Texas 77586, and 1120 Clay Road, Houston, Texas 77041.

#### RESPONDENT CRYPTOTRADE FXWAY

26. CryptoTradeFXWay aka CryptoTrade FX Way ("**Respondent CryptoTradeFXWay**") maintains a website accessible at cryptotradefxway.com (the "**CryptoTradeFXWay Website**").
27. The CryptoTradeFX Way Website represents its address is Tower 12, 18-22 Bridge Street, Deansgate, Manchester, United Kingdom.
28. Privacy Protect, LLC, is the Registrant, Technical Contact and Administrative Contact for the CryptoTradeFXWay Website, and its address is 10 Corporate Drive, Massachusetts 01803.
29. Hostinger UAB is the Registrar of the CryptoTradeFXWay Website and its address is Jonavos g. 60C, 44192, Kuanas, Lithuania, and 61 Lordou Vironos Street, 6023 Larnaca, Cyprus.
30. Respondent CryptoTradeFX Way is also being served at addresses associated with Respondent Blundell at 3520 Nasa Parkway, Seabrook, Texas 77586, and 1120 Clay Road, Houston, Texas 77041.

### RESPONDENT PROACTIVE EXPERTTRADE

31. Proactive ExpertTrade ("**Respondent Proactive ExpertTrade**") maintains a website accessible at proactiveexperttrade.com (the "**Proactive ExpertTrade Website**").
32. The Proactive ExpertTrade Website represents its address is in New York.
33. WhoisGuard, Inc. is the Registrant, Technical Contact and Administrative Contact for the Proactive ExpertTrade Website and its address is P.O. Box 0823-03411 Panama PA.
34. Namecheap, Inc. is the Registrar of the Proactive ExpertTrade Website and its address is 4600 East Washington Street, Suite 305, Phoenix, Arizona 90064.
35. Respondent Proactive ExpertTrade is also being served at addresses associated with Respondent Blundell at 3520 Nasa Parkway, Seabrook, Texas 77586, and 1120 Clay Road, Houston, Texas 77041.

### RESPONDENT RELIABLEFX INTERNAL TRADE

36. ReliableFX Internal Trade ("**Respondent ReliableFX Internal Trade**") maintains a website accessible at reliablefxinternaltrade.com (the "**ReliableFX Internal Trade Website**").
37. The ReliableFX Internal Trade Website represents its address is 27 Colmore Row, Birmingham, United Kingdom.
38. WhoisGuard, Inc. is the Registrant, Technical Contact and Administrative Contact for the ReliableFX Internal Trade Website and its address is P.O. Box 0823-03411 Panama PA.
39. Namecheap, Inc. is the Registrar of the ReliableFX Internal Trade Website and its address is 4600 East Washington Street, Suite 305, Phoenix, Arizona 90064.
40. Respondent ReliableFX Internal Trade is also being served at addresses associated with Respondent Blundell at 3520 Nasa Parkway, Seabrook, Texas 77586, and 1120 Clay Road, Houston, Texas 77041.

### RESPONDENT MAXFX INTERNAL TRADE

41. MaxFX Internal Trade ("**Respondent MaxFX Internal Trade**") maintains a website accessible at maxfxinternaltrade.com (the "**MaxFX Internal Trade Website**").
42. The MaxFX Internal Trade Website represents its address is 17216 Lafayette Trails Drive, Glenco, Missouri 63038.

43. WhoisGuard, Inc. is the Registrant, Technical Contact and Administrative Contact for the MaxFX Internal Trade Website and its address is P.O. Box 0823-03411 Panama PA.
44. Namecheap, Inc. is the Registrar of the MaxFX Internal Trade Website and its address is 4600 East Washington Street, Suite 305, Phoenix, Arizona 90064.
45. Respondent MaxFX Internal Trade is also being served at addresses associated with Respondent Blundell at 3520 Nasa Parkway, Seabrook, Texas 77586, and 1120 Clay Road, Houston, Texas 77041.

#### RESPONDENT ANTPOOLTOP MINING

46. AntPoolTop Mining ("**Respondent AntPoolTop Mining**") maintains a website accessible at antpooltopmining.com (the "**AntPoolTop Mining Website**").
47. The AntPoolTop Mining Website represents its address is 9111 Cross Park Drive, Suite D100, Knoxville, Nashville, Tennessee.
48. Privacy Protect, LLC, is the Registrant, Administrative Contact and Technical Contact for the AntPoolTop Mining Website and its address is 10 Corporate Drive, Burlington, Massachusetts 01803.
49. PDR Ltd. dba PublicDomainRegistry.com is the Registrar of the AntPoolTop Mining Website and its address is 501 IT Building No. 3, NESCO IT Park, NESCO Complex, Western Express Highway, Goregaon (East), Mumbai – 400063, Maharashtra, India.
50. Respondent AntPoolTop Mining is also being served at addresses associated with Respondent Blundell at 3520 Nasa Parkway, Seabrook, Texas 77586, and 1120 Clay Road, Houston, Texas 77041.

#### RESPONDENT EXPERTTRADES247

51. ExpertTrades247 ("**Respondent ExpertTrades247**") maintains a website accessible at experttrades247.com (the "**Expert Trades Website**").
52. The Expert Trades Website represents its address is 5421 Houston, Texas.
53. WhoisGuard, Inc. is the Registrant, Technical Contact and Administrative Contact for the ExpertTrades247 Website and its address is P.O. Box 0823-03411 Panama PA.
54. Namecheap, Inc. is the Registrar of the ExpertTrades247 Website and its address is 4600 East Washington Street, Suite 305, Phoenix, Arizona 90064.

55. Respondent ExpertTrades247 is also being served at addresses associated with Respondent Blundell at 3520 Nasa Parkway, Seabrook, Texas 77586, and 1120 Clay Road, Houston, Texas 77041.

RESPONDENT BLUNDELL

56. James Blundell ("**Respondent Blundell**") is being served at 3520 Nasa Parkway, Seabrook, Texas 77586, and 1120 Clay Road, Houston, Texas 77041.

THE CRYPTOCURRENCY INVESTMENTS

57. The Proactive Expert Trading Website, the Reliable Miners Website, the BitcoinFX Options Website, the Sure Trade Earnings Website, the CryptoTradeFXWay Website, the Proactive ExpertTrade Website, the ReliableFX Internal Trade Website, the MaxFX Internal Trade Website, the AntPoolTop Mining Website and the ExpertTrades247 Website are publicly soliciting cryptocurrency investments that purport to pay lucrative fixed returns over a fixed term – typically measured in hours, and not months or years.
58. The websites generally refer to the cryptocurrency investments as the Silver, Diamond, Gold, Gold+ and/or Platinum Plans and describe them as follows:
- A. The Proactive Expert Trading Website, the Reliable Miners Website, the Sure Trade Earnings Website, the Proactive Expert Trade Website and the Reliable FX Internal Trade Website and the ExpertTrades247 represent investors can purchase investments in the Silver Plan for a minimum of \$300, the Diamond Plan for a minimum of \$1,500 and the Gold Plan for a minimum of \$5,000;
  - B. The BitcoinFX Options Website represents investors can purchase investments in the Silver Plan for a minimum of \$500, the Diamond Plan for a minimum of \$1,500, the Gold Plan for a minimum of \$2,500 and the Gold+ Plan for a minimum of \$4,000;
  - C. The CryptoTradeFXWay Website and MaxFX Internal Trade Website represent investors can purchase investments in the Silver Plan for an unidentified amount of principal, the Diamond Plan for a minimum of \$1,500 and the Gold Plan for a minimum of \$5,000; and
  - D. The AntPoolTop Mining Website represents investors can purchase investments in the Silver Plan for a minimum of \$250, the Gold Plan for a minimum of \$1,000 and the Platinum Plan for a minimum of \$1,500.
59. The Proactive Expert Trading Website, the Reliable Miners Website, the BitcoinFX Options Website, the Sure Trade Earnings Website, the CryptoTradeFXWay Website, the Proactive ExpertTrade Website, the ReliableFX Internal Trade Website and the MaxFX Internal Trade Website also represent investors can purchase investments in the following plans that pay profits on an hourly basis:



- A. They are representing investors can purchase investments in a plan for \$500 to \$4,999 and receive a profit of 42 percent per hour for 24 hours;
  - B. They are representing investors can purchase investments in a plan for \$5,000 to \$9,999 and receive a profit of 60 percent per hour for 24 hours; and
  - C. They are representing investors can purchase investments in a plan for \$10,000 to \$1,000,000 and receive a profit of 80 percent per hour for 24 hours.
60. The AntPoolTop Mining Website and the ExpertTrades247 Website do not provide the same detail about the three-tiered investment structure. They do, however, represent their investments accrue profits every hour and investors can withdraw principal at any time.
61. The websites serve as platforms for purchasing the cryptocurrency investments, as investors can register accounts, deposit principal and designate their plan through the websites.
62. The websites represent at least one Texas resident is a client of each platform.

#### THE REFERRAL PROGRAMS

63. Respondents Proactive Expert Trading, Reliable Miners, BitcoinFX Options, Sure Trade Earnings, CryptoTradeFXWay, Proactive ExpertTrade, ReliableFX Internal Trade and MaxFX Internal Trade are recruiting salespersons to refer new clients.
64. Respondents Proactive Expert Trading, Reliable Miners, BitcoinFX Options, Sure Trade Earnings, CryptoTradeFXWay, Proactive ExpertTrade, ReliableFX Internal Trade and MaxFX Internal Trade are typically providing salespersons with tools to recruit new investors, such as referral links that salespersons can use in electronic mail and websites that solicit investments.
65. Respondents Proactive Expert Trading, Reliable Miners, BitcoinFX Options, Sure Trade Earnings, CryptoTradeFXWay, Proactive ExpertTrade, ReliableFX Internal Trade and MaxFX Internal Trade are promising to pay commissions to salespersons who successfully refer new clients.

#### THE PHONY ADDRESSES

66. The Proactive Expert Trading Website represents its address is 5452 Detroit, Texas. This address does not resolve to a physical address in Texas.
67. The Reliable Miners Website represents its address is 857 Main Street, 102 Avenue, Washington, DC. This address does not resolve to a physical address in

Washington, DC, and Respondent Reliable Miners is not providing any other information that reflects the location of its offices.

68. The BitcoinFx Options Website represents its address is Wall Street, New York, United States. This address does not resolve to a physical address in New York, and Respondent BitcoinFx Options is not providing any other information that reflects the location of its offices.
69. The Sure Trade Earnings Website represents its address is 5452 Detroit, Texas. This address does not resolve to a physical address in Texas, and Respondent Sure Trade Earnings is not providing any other information that reflects the location of its offices.
70. The Proactive ExpertTrade Website represents its address is in New York. Respondent Proactive ExpertTrade is not providing any other information that reflects the location of its offices.
71. The ExpertTrades247 Website represents its address is 5421 Houston Texas. Respondent ExpertTrades247 is not providing any other information that reflects the location of its offices.

#### RESPONDENT BLUNDELL IS USING SOCIAL MEDIA TO SOLICIT INVESTORS

72. Respondent Blundell operates at least three social media accounts through Instagram, seven social media accounts through Facebook and one social media account through LinkedIn.
73. Respondent Blundell is using these social media accounts to advertise investment services related to binary options trading, forex trading, cryptocurrency trading, and Bitcoin mining.
74. Respondent Blundell is encouraging the public to contact him, and he is providing a WhatsApp number that potential investors can use to place a call to him.

#### RESPONDENT BLUNDELL AND RESPONDENT PROACTIVE EXPERT TRADING'S OFFERING OF INVESTMENTS

75. Respondent Blundell is directing potential investors to Respondent Proactive Expert Trading, and he is encouraging them to register an account through the Proactive Expert Trading Website and purchase an investment issued by Respondent Proactive Expert Trading.
76. Respondent Blundell is telling potential investors that, after they purchase an investment issued by Respondent Proactive Expert Trading, he will manage and trade in their account in return for the payment of a commission equal to ten percent of their profits.

77. Respondent Blundell is telling investors the investments issued by Respondent Proactive Expert Trading will pay rates of return over terms that differ from the information set forth in the Proactive Expert Trading Website. He is representing as follows:
- A. Respondent Blundell is representing that a minimum investment in the amount of \$300.00 will return \$4,500.00 after five days of trading;
  - B. Respondent Blundell is representing that a minimum investment in the amount of \$400.00 will return \$6,000.00 after five days of trading;
  - C. Respondent Blundell is representing that a minimum investment in the amount of \$500.00 will return \$7,500.00 after five days of trading;
  - D. Respondent Blundell is representing that a minimum investment in the amount of \$600.00 will return \$9,000.00 after five days of trading;
  - E. Respondent Blundell is representing that a minimum investment in the amount of \$700.00 will return \$10,500.00 after five days of trading;
  - F. Respondent Blundell is representing that a minimum investment in the amount of \$800.00 will return \$12,000.00 after five days of trading;
  - G. Respondent Blundell is representing that a minimum investment in the amount of \$900.00 will return \$13,500.00 after five days of trading; and
  - H. Respondent Blundell is representing that a minimum investment in the amount of \$1,000.00 will return \$15,000.00 after five days of trading.
78. Respondent Blundell is also guaranteeing investors a 98 percent winning rate on trades.

#### THE FORGED TRADING LICENSE

79. Respondent Blundell is recruiting potential investors by falsely claiming he is licensed as a binary options trader by Texas City, Texas.
80. Respondent Blundell is providing potential investors with a forged certificate that falsely shows he is licensed as a binary options trader by Texas City, Texas.

#### THE FORGED TEXAS DRIVER LICENSE

81. Respondent Blundell is recruiting potential investors by falsely claiming he holds a Texas driver license.
82. Respondent Blundell is providing potential investors with an image of a forged Texas driver license.

## REGISTRATION VIOLATIONS

83. Respondents Proactive Expert Trading, Reliable Miners, BitcoinFX Options, Sure Trade Earnings, CryptoTradeFXWay, Proactive ExpertTrade, ReliableFX Internal Trade, MaxFX Internal Trade, AntPoolTop Mining, ExpertTrades247 and Blundell (collectively the "**Respondents**") have not been registered with the Securities Commissioner as dealers or agents at any time material hereto.
84. The cryptocurrency investments have not been registered by qualification, notification, or coordination at any time material hereto, and no permit has been granted for their sale in Texas.

## FRAUD AND THE FAILURE TO DISCLOSE THE IDENTITY AND QUALIFICATIONS OF PRINCIPALS

85. In connection with the offer of the cryptocurrency investments, Respondents Proactive Expert Trading and Blundell are intentionally failing to disclose the identity of Respondent Proactive Expert Trading's principals, as well as their business repute and qualifications, and this information constitutes a material fact.
86. In connection with the offer of the cryptocurrency investments, Respondent Reliable Miners is intentionally failing to disclose the identity of its principals, as well as their business repute and qualifications, and this information constitutes a material fact.
87. In connection with the offer of the cryptocurrency investments, Respondent Bitcoin FX Options is intentionally failing to disclose the identity of its principals, as well as their business repute and qualifications, and this information constitutes a material fact.
88. In connection with the offer of the cryptocurrency investments, Respondent Sure Trade Earnings is intentionally failing to disclose the identity of its principals, as well as their business repute and qualifications, and this information constitutes a material fact.
89. In connection with the offer of the cryptocurrency investments, Respondent CryptoTradeFXWay is intentionally failing to disclose the identity of its principals, as well as their business repute and qualifications, and this information constitutes a material fact.
90. In connection with the offer of the cryptocurrency investments, Respondent Proactive Expert Trade is intentionally failing to disclose the identity of its principals, as well as their business repute and qualifications, and this information constitutes a material fact.
91. In connection with the offer of the cryptocurrency investments, Respondent ReliableFX Internal Trade is intentionally failing to disclose the identity of its

principals, as well as their business reputes and qualifications, and this information constitutes a material fact.

92. In connection with the offer of the cryptocurrency investments, Respondent MaxFX Internal Trade is intentionally failing to disclose the identity of its principals, as well as their business reputes and qualifications, and this information constitutes a material fact.
93. In connection with the offer of the cryptocurrency investments, Respondent AntPoolTop Mining is intentionally failing to disclose the identity of its principals, as well as their business reputes and qualifications, and this information constitutes a material fact.
94. In connection with the offer of the cryptocurrency investments, Respondent ExpertTrades247 is intentionally failing to disclose the identity of its principals, as well as their business reputes and qualifications, and this information constitutes a material fact.

**FRAUD AND THE FAILURE TO  
DISCLOSE INFORMATION RELATING TO BUSINESS OPERATIONS**

95. In connection with the offer of the cryptocurrency investments, Respondents Proactive Expert Trading and Blundell are intentionally failing to disclose Respondent Proactive Expert Trading's strategy for generating the represented profits over the represented terms, and this information constitutes a material fact.
96. In connection with the offer of the cryptocurrency investments, Respondent Reliable Miners is intentionally failing to disclose its strategy for generating the represented profits over the represented terms, and this information constitutes a material fact.
97. In connection with the offer of the cryptocurrency investments, Respondent Bitcoin FX Options is intentionally failing to disclose its strategy for generating the represented profits over the represented terms, and this information constitutes a material fact.
98. In connection with the offer of the cryptocurrency investments, Respondent Sure Trade Earnings is intentionally failing to disclose its strategy for generating the represented profits over the represented terms, and this information constitutes a material fact.
99. In connection with the offer of the cryptocurrency investments, Respondent CryptoTradeFXWay is intentionally failing to disclose its strategy for generating the represented profits over the represented terms, and this information constitutes a material fact.
100. In connection with the offer of the cryptocurrency investments, Respondent Proactive Expert Trade is intentionally failing to disclose its strategy for generating

the represented profits over the represented terms, and this information constitutes a material fact.

101. In connection with the offer of the cryptocurrency investments, Respondent ReliableFX Internal Trade is intentionally failing to disclose its strategy for generating the represented profits over the represented terms, and this information constitutes a material fact.
102. In connection with the offer of the cryptocurrency investments, Respondent MaxFX Internal Trade is intentionally failing to disclose its strategy for generating the represented profits over the represented terms, and this information constitutes a material fact.
103. In connection with the offer of the cryptocurrency investments, Respondent AntPoolTop Mining is intentionally failing to disclose its strategy for generating the represented profits over the represented terms, and this information constitutes a material fact.
104. In connection with the offer of the cryptocurrency investments, Respondent ExpertTrades247 is intentionally failing to disclose its strategy for generating the represented profits over the represented terms, and this information constitutes a material fact.

#### FRAUD AND THE FAILURE TO DISCLOSE FINANCIAL INFORMATION

105. In connection with the offer of the cryptocurrency investments, Respondent Proactive Expert Trading is intentionally failing to disclose its assets, liabilities and any other financial information that reflects its ability to pay fixed returns over fixed terms regardless of the profitability of the underlying investment activity, and this information constitutes a material fact.
106. In connection with the offer of the cryptocurrency investments, Respondent Reliable Miners is intentionally failing to disclose its assets, liabilities and any other financial information that reflects its ability to pay fixed returns over fixed terms regardless of the profitability of the underlying investment activity, and this information constitutes a material fact.
107. In connection with the offer of the cryptocurrency investments, Respondent Bitcoin FX Options is intentionally failing to disclose its assets, liabilities and any other financial information that reflects its ability to pay fixed returns over fixed terms regardless of the profitability of the underlying investment activity, and this information constitutes a material fact;
108. In connection with the offer of the cryptocurrency investments, Respondent Sure Trade Earnings is intentionally failing to disclose its assets, liabilities and any other financial information that reflects its ability to pay fixed returns over fixed terms regardless of the profitability of the underlying investment activity, and this information constitutes a material fact.

109. In connection with the offer of the cryptocurrency investments, Respondent CryptoTradeFXWay is intentionally failing to disclose its assets, liabilities and any other financial information that reflects its ability to pay fixed returns over fixed terms regardless of the profitability of the underlying investment activity, and this information constitutes a material fact.
110. In connection with the offer of the cryptocurrency investments, Respondent Proactive Expert Trade is intentionally failing to disclose its assets, liabilities and any other financial information that reflects its ability to pay fixed returns over fixed terms regardless of the profitability of the underlying investment activity, and this information constitutes a material fact.
111. In connection with the offer of the cryptocurrency investments, Respondent ReliableFX Internal Trade is intentionally failing to disclose its assets, liabilities and any other financial information that reflects its ability to pay fixed returns over fixed terms regardless of the profitability of the underlying investment activity, and this information constitutes a material fact.
112. In connection with the offer of the cryptocurrency investments, Respondent MaxFX Internal Trade is intentionally failing to disclose its assets, liabilities and any other financial information that reflects its ability to pay fixed returns over fixed terms regardless of the profitability of the underlying investment activity, and this information constitutes a material fact.

#### FRAUD AND THE PHYSICAL LOCATION OF THE ISSUERS

113. In connection with the offer of the cryptocurrency investments, Respondent Proactive Expert Trading is representing its address is 5452 Detroit, Texas. This representation constitutes a knowing misrepresentation of a relevant fact because this address does not resolve to a physical address in Texas.
114. In connection with the offer of the cryptocurrency investments, Respondent Reliable Miners is representing its address is 857 Main Street, 102 Avenue, Washington, DC. This representation constitutes a knowing misrepresentation of a relevant fact because this address does not resolve to a physical address in Washington, DC.
115. In connection with the offer of the cryptocurrency investments, Respondent Reliable Miners is intentionally failing to disclose any other information that reflects the location of its offices, and this information constitutes a material fact.
116. In connection with the offer of the cryptocurrency investments, Respondent Bitcoin FX Options is representing its address is Wall Street, New York, United States, and is not providing any other information that identifies the location of its offices. Respondent Bitcoin FX Options is intentionally failing to disclose any other information that reflects the location of its offices, and this information constitutes a material fact.

117. In connection with the offer of the cryptocurrency investments, Respondent Sure Trade Earnings is representing its address is 5452 Detroit, Texas. This representation constitutes a knowing misrepresentation of a relevant fact because this address does not resolve to a physical address in Texas.
118. In connection with the offer of the cryptocurrency investments, Respondent Sure Trade Earnings is also intentionally failing to disclose any other information that reflects the location of its offices, and this information constitutes a material fact.
119. In connection with the offer of the cryptocurrency investments, Respondent Proactive ExpertTrade is representing its address is in New York and is not providing any other information that identifies the location of its offices. Respondent Proactive ExpertTrade is intentionally failing to disclose any other information that reflects the location of its offices, and this information constitutes a material fact.
120. In connection with the offer of the cryptocurrency investments, Respondent ExpertTrades247 is representing its address is 5421 Houston Texas. This representation constitutes a knowing misrepresentation of a relevant fact because this address does not resolve to a physical address in Texas.
121. In connection with the offer of the cryptocurrency investments, Respondent ExpertTrades247 is also intentionally failing to disclose any other information that reflects the location of its offices, and this information constitutes a material fact.

FRAUD AND THE CONCEALMENT OF  
THE RISKS ASSOCIATED WITH CRYPTOCURRENCIES

122. In connection with the offer of the cryptocurrency investments, Respondents are intentionally failing to disclose the following risks associated with cryptocurrencies and investments tied to cryptocurrencies, and these risks constitute material facts:
  - 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 may decrease over a short period of time, resulting in significant loss to owners of cryptocurrencies;
  - C. A system or technical failure, or deficient source code, may negatively impact the ability to exchange cryptocurrencies for fiat currencies, as well as the price of cryptocurrencies;
  - D. A hacking incident or malicious attack may negatively impact the price of cryptocurrencies; and



- E. Cryptocurrencies compete with all other cryptocurrencies, and this competition may negatively impact the price of a specific cryptocurrency.

### DECEPTION AND THE REFERRAL PROGRAMS

123. As described herein, Respondents Proactive Expert Trading, Reliable Miners, BitcoinFX Options, Sure Trade Earnings, CryptoTradeFXWay, Proactive ExpertTrade, ReliableFX Internal Trade and MaxFX Internal Trade are promising to pay commissions to salespersons who refer new clients.
124. These representations are materially misleading or otherwise likely to deceive the public because Respondents Proactive Expert Trading, Reliable Miners, BitcoinFX Options, Sure Trade Earnings, CryptoTradeFXWay, Proactive ExpertTrade, ReliableFX Internal Trade and MaxFX Internal Trade are not disclosing the following information:
- A. Persons who offer and sell securities in Texas, including their cryptocurrency investments, and are not registered as dealers or agents may violating Section 12 of the Securities Act; and
  - B. Persons who offer and sell their cryptocurrency investments in Texas may be offering unregistered securities in violation of Section 7 of the Securities Act.

### FRAUD AND THE FORGED TRADING LICENSE AND DRIVER LICENSE

125. In connection with the offer of cryptocurrency investments, Respondent Blundell is presenting the forged trading license described herein, and the presentment of this forged trading license constitutes a knowing misrepresentation of a relevant fact.
126. In connection with the offer of cryptocurrency investments, Respondent Blundell is presenting the forged Texas driver license described herein, and the presentment of this forged Texas driver license constitutes a knowing misrepresentation of a relevant fact.

### CONCLUSIONS OF LAW

1. The cryptocurrency investments are securities as the term is defined by Section 4.A of the Securities Act.
2. Respondents are violating Section 7 of the Securities Act by offering securities for sale in Texas and 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 Proactive Expert Trading, Reliable Miners, BitcoinFX Options, Sure Trade Earnings, CryptoTradeFXWay, Proactive ExpertTrade, ReliableFX Internal Trade, and MaxFX Internal Trade have made an offer containing statements that are materially misleading or otherwise likely to deceive the public.
6. Respondents' conduct, acts, and practices threaten immediate and irreparable public 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 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 pursuant to an exemption from registration under the Securities Act.
2. It is further ORDERED Respondents immediately CEASE AND DESIST from acting as securities dealers or agents in Texas until Respondents are registered with the Securities Commissioner or is acting pursuant to an exemption from registration under the Securities Act.
3. It is further ORDERED 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 Respondents Proactive Expert Trading, Reliable Miners, BitcoinFX Options, Sure Trade Earnings, CryptoTradeFXWay, Proactive ExpertTrade, ReliableFX Internal Trade, and MaxFX Internal Trade 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 Texas 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 Texas Securities Act that any knowing violation of an order issued by the Securities Commissioner under the authority of Section 23-2 of the Texas Securities Act is a criminal offense punishable by a fine of not more than \$10,000, or imprisonment in the penitentiary for two to ten years, or by both such fine and imprisonment.

SIGNED AND ENTERED by the Securities Commissioner this 18<sup>th</sup> day of November, 2020.



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TRAVIS J. ILES  
Securities Commissioner