## TRAVIS J. ILES SECURITIES COMMISSIONER

## CLINTON EDGAR DEPUTY SECURITIES COMMISSIONER

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# Texas State Securities Board

208 E. 10th Street, 5th Floor Austin, Texas 78701-2407 www.ssb.texas.gov E, WALLY KINNEY CHAIR

MIGUEL ROMANO, JR. MEMBER

KENNY KONCABA MEMBER

ROBERT BELT MEMBER

MELISSA TYROCH MEMBER

IN THE MATTER OF	Ş
TRADEGO FOREX EXCHANGE AKA	§
TRADEGO EXCHANGE AKA TRADEGO	Ş
FOREX GLOBAL WEALTH GROUP AKA	Ş
FOREX GLOBAL TRADING AKA FOREX	Š
WEALTH GROUP; RONALD AMERAL AKA	Ş
RONALD GREG AMERAL AKA GREG	§
RONALD; DAVID NIELSON AKA DAVID	§
NEILSON; AND BRANDON NEWBERN	Š

Order No. ENF-20-CDO-1829

TradeGo Forex Exchange aka TradeGo Exchange aka TradeGo Forex Global Wealth Group aka Forex Global Trading aka Forex Wealth Group

10066 Rock Meadow Road, Lakeside, California 92040; 13465 Camino, El Cajon, CA 92021; 13465 Cam Canada, Ste 106-139, El Cajon, CA 92021-8813; 21254 E Bonanza Way, Queen Creek, AZ 85142; and 1044 E Indigo Street, Mesa, AZ 85203.

## Ronald Ameral aka Ronald Greg Ameral aka Greg Ronald

10066 Rock Meadow Road, Lakeside, California 92040; 13465 Camino, El Cajon, CA 92021; 13465 Cam Canada, Ste 106-139, El Cajon, CA 92021-8813; 21254 E Bonanza Way, Queen Creek, AZ 85142; and 1044 E Indigo Street, Mesa, AZ 85203.

#### David Nielson aka David Neilson

10066 Rock Meadow Road, Lakeside, California 92040; 13465 Camino, El Cajon, CA 92021; 13465 Cam Canada, Ste 106-139, El Cajon, CA 92021-8813; 21254 E Bonanza Way, Queen Creek, AZ 85142; and 1044 E Indigo Street, Mesa, AZ 85203.

#### **Brandon Newbern**

10066 Rock Meadow Road, Lakeside, California 92040; 13465 Camino, El Cajon, CA 92021; 13465 Cam Canada, Ste 106-139, El Cajon, CA 92021-8813; 21254 E Bonanza Way, Queen Creek, AZ 85142; and 1044 E Indigo Street, Mesa, AZ 85203.

#### **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**

- TradeGo Forex Exchange aka TradeGo Exchange aka TradeGo Forex Global Wealth Group aka Forex Global Trading aka Forex Wealth Group (hereinafter referred to as "Respondent TradeGo Forex Exchange") can be served at 10066 Rock Meadow Road, Lakeside, California 92040; 13465 Camino, El Cajon, CA 92021; 13465 Cam Canada, Ste 106-139, El Cajon, CA 92021-8813; 21254 E Bonanza Way, Queen Creek, AZ 85142; and 1044 E Indigo Street, Mesa, AZ 85203.
- 2. Ronald Ameral aka Ronald Greg Ameral aka Greg Ronald (hereinafter referred to as "Respondent Ameral") can be served at 10066 Rock Meadow Road, Lakeside, California 92040; 13465 Camino, El Cajon, CA 92021; 13465 Cam Canada, Ste 106-139, El Cajon, CA 92021-8813; 21254 E Bonanza Way, Queen Creek, AZ 85142; and 1044 E Indigo Street, Mesa, AZ 85203.
- 3. David Nielson aka David Neilson (hereinafter referred to as "Respondent Nielson") can be served at 10066 Rock Meadow Road, Lakeside, California 92040; 13465 Camino, El Cajon, CA 92021; 13465 Cam Canada, Ste 106-139, El Cajon, CA 92021-8813; 21254 E Bonanza Way, Queen Creek, AZ 85142; and 1044 E Indigo Street, Mesa, AZ 85203.
- 4. Brandon Newbern (hereinafter referred to as "Respondent Newbern") can be served at 10066 Rock Meadow Road, Lakeside, California 92040; 13465 Camino, El Cajon, CA 92021; 13465 Cam Canada, Ste 106-139, El Cajon, CA 92021-8813; 21254 E Bonanza Way, Queen Creek, AZ 85142; and 1044 E Indigo Street, Mesa, AZ 85203.

## THE PUBLIC SOLICITATION OF FOREX TRADING INVESTMENTS

- 5. Respondent TradeGo Forex Exchange and Respondent Ameral are publishing advertisements in financial services sections of Craigslist that target residents of Dallas and Houston, as well as residents of other cities located in the United States.
- 6. They have already posted more than 250 advertisements, and they are continuing to publish more advertisements.
- 7. These advertisements are promoting investments tied to forex trading issued by Respondent TradeGo Forex Exchange and refer to Respondent TradeGo Forex Exchange by various names, such as TradeGo Exchange and Forex Wealth Group.
- 8. The advertisements tout the payment of lucrative returns, including profits of \$1,000 to \$5,000 per day.

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9. The advertisements are directing potential investors to contact Respondent TradeGo Forex Exchange by responding with their name, electronic mail address, and telephone number.

### THE TERMS OF THE FOREX TRADING INVESTMENTS

- 10. Respondent TradeGo Forex Exchange, Respondent Ameral, Respondent Nielson, and Respondent Newbern (hereinafter collectively referred to as "Respondents") are communicating with persons responding to the advertisements and pitching the forex investments. They are collectively representing as follows:
  - A. Respondents will exchange client funds for Bitcoin and use Bitcoin to invest and trade in forex and, in some cases, other assets such as oil, gold, and stocks issued by publicly traded companies;
  - B. This trading program is low risk and investors cannot lose their principal;
  - C. Respondents generate returns through trading, pay 50 percent of returns to investors, and retain the remaining returns as payment for services; and
  - D. Investors will ultimately earn lucrative returns and they will receive profits after one week of trading.
- 11. Respondent Ameral is using aliases when communicating with investors.

## THE PHONY CORPORATE BANK ACCOUNTS

- 12. Respondents are directing clients to deposit money in accounts at Wells Fargo Bank, Navy Federal Credit Union, and BBVA Compass Bank.
- 13. These bank accounts are not controlled by Respondent TradeGo Forex Exchange. Instead, the Wells Fargo account is personally owned and controlled by Respondent Ameral, the Navy Federal Credit Union account is personally owned and controlled by Respondent Newbern, and the BBVA Compass Bank account is personally owned and controlled by Respondent Newbern.
- 14. Unbeknownst to potential investors, Respondents TradeGo Forex Exchange, Ameral and Newbern are commingling deposits with funds from various sources and are not using monies in the accounts for expenses associated with forex trading.

## THE CONTROL OF FUNDS

15. Respondent TradeGo Forex Exchange, Respondent Ameral, and Respondent Nielson are directing investors to open and fund accounts through an online trading platform and an online brokerage.

- 16. The trading platform and brokerage are managed by third parties, and Respondents are generally unable to access client accounts.
- 17. Respondent TradeGo Forex Exchange, Respondent Ameral, and Respondent Nielson are directing clients to provide login information for the accounts, thereby providing Respondents with access to funds.
- 18. However, once investors provide login credentials, Respondents will be able to appropriate funds without any meaningful controls implemented by the third-party trading platform or brokerage.

## THE LOCATION OF RESPONDENTS AND THEIR CORPORATE OFFICES

- 19. Respondents are not providing potential investors with their physical address or the location of the corporate offices of Respondent TradeGo Forex Exchange.
- 20. Respondent TradeGo Forex Exchange and Respondent Ameral are, however, representing Respondent TradeGo Forex Exchange maintains its headquarters in Arizona.
- 21. Although they claim Respondent TradeGo Forex Exchange maintains its headquarters in Arizona, Respondent TradeGo Forex Exchange has not filed for incorporation or organization with the Arizona Division of Corporations and has not been authorized to transact business in Arizona as a foreign or domestic entity.

## LACK OF REGISTRATION WITH THE CFTC AND NFA

- 22. Respondents are touting their experience in trading forex and describing themselves as professional forex traders.
- 23. Although Respondents are touting their experience in trading forex, they have not been registered in any capacity with the Commodity Futures Trading Commission or the National Future Association.

## **SECURITIES REGISTRATION VIOLATIONS**

- 24. Respondent TradeGo Forex Exchange has not been registered with the Securities Commissioner as a dealer at any time material hereto.
- 25. Respondent Ameral, Respondent Nielson and Respondent Newbern have not been registered with the Securities Commissioner as agents of Respondent TradeGo Forex Exchange at any time material hereto.
- 26. The investments in the forex trading programs issued by Respondent TradeGo Forex Exchange have not been registered by qualification, notification, or coordination, and no permit has been granted for their sale in Texas.

## FRAUD AND DECEPTION AND THE LOCATION OF RESPONDENT FOREX GLOBAL

- 27. In connection with the offer of investments in the forex trading program, Respondents are intentionally failing to disclose the address and physical location of Respondent TradeGo Forex Exchange, Respondent Ameral, Respondent Nielson and Respondent Newbern, and this information constitutes material facts.
- 28. As described herein, Respondent TradeGo Forex Exchange and Respondent Ameral are representing Respondent TradeGo Forex Exchange maintains its headquarters in Arizona.
- 29. This statement is materially misleading or otherwise likely to deceive the public because Respondent TradeGo Forex Exchange has not filed for incorporation or organization with the Arizona Division of Corporations and has not been authorized to transact business in Arizona as a foreign or domestic entity.

## FRAUD AND THE USE OF ALIASES AND OTHER NAMES

- 30. In connection with the offer of investments in the forex trading programs, Respondent Ameral is using aliases when communicating with investors. The use of aliases constitutes the knowing misrepresentation of a relevant fact.
- 31. Respondents TradeGo Forex Exchange previously operated under the names Forex Global Trading and Forex Wealth Group but is now operating under the names TradeGo Forex Exchange aka TradeGo Exchange aka TradeGo Forex Global Wealth Group. The use of various aliases for Respondent TradeGo Forex Exchange is materially misleading or otherwise likely to deceive the public for the following reasons:
  - A. Respondents are not disclosing that Respondent TradeGo Forex Exchange was previously known as Forex Global Trading aka Forex Wealth Group; and
  - B. Absent such information, potential investors are unable to conduct meaningful due diligence or independently verify the history of TradeGo Forex Exchange.

# FRAUD AND DECEPTION RELATING TO THE BUSINESS REPUTE AND QUALIFICATIONS OF RESPONDENTS

- 32. In connection with the offer of investments in the forex trading programs, Respondents are intentionally failing to disclose the identity of the principals of Respondent TradeGo Forex Exchange, as well as their business repute and qualifications, and this information constitutes material facts.
- 33. In connection with the offer of investments in the forex trading programs, Respondents are intentionally failing to disclose their business repute and qualifications, and this information constitutes material facts.

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- 34. As described herein, Respondents are touting their experience in trading forex and describing themselves as professional forex traders.
- 35. These statements are materially misleading or otherwise likely to deceive the public for the following reasons:
  - A. Respondents have not been and are not currently registered with the National Futures Association; and
  - B. Respondents have not been and are not currently registered with the Commodity Futures Trading Commission.

## FRAUD AND THE MANAGEMENT OF THE FOREX TRADING PROGRAMS

- 36. In connection with the offer of investments in the forex trading programs, Respondents are intentionally failing to disclose their strategies for trading foreign currencies, and this information constitutes a material fact.
- 37. In connection with the offer of investments in the forex trading programs, Respondent TradeGo Forex Exchange, Respondent Nielson, and Respondent Newbern are intentionally failing to disclose their strategies for trading oil, gold and stocks issued by publicly traded companies.
- 38. In connection with the offer of investments in the forex trading programs, Respondents are intentionally failing to disclose their procedures for securing their computers and protecting the integrity of login credentials and other data from malware, hacks, and other malicious attacks, and this information constitutes a material fact.
- 39. In connection with the offer of investments in the forex trading programs, Respondents are intentionally failing to disclose their procedures for overcoming hardware failures, power outages, network disconnections and interruptions, and other events that may impair the ability to trade forex, and this information constitutes a material fact.

#### FRAUD AND THE PHONY CORPORATE BANK ACCOUNTS

- 40. As described herein, Respondents are directing clients to deposit their principal in accounts at Wells Fargo Bank, Navy Federal Credit Union, and BBVA Compass Bank.
- 41. In connection with the offer of investments in the forex trading programs, Respondents are intentionally failing to disclose the following material facts relating to these bank accounts:

- A. The bank accounts are not owned by Respondent TradeGo Forex Exchange, and instead are personally owned and controlled by Respondent Ameral and Newbern;
- B. Respondents TradeGo Forex Exchange, Ameral and Newbern are commingling deposits from various sources in the bank accounts; and
- C. Respondents TradeGo Forex Exchange, Ameral and Newbern are not using monies in the accounts for expenses associated with forex trading.

### FRAUD AND THE RISKS ASSOCIATED WITH FOREX TRADING

- 42. In connection with the offer of investments in the forex trading programs, Respondents are intentionally failing to disclose the following risks associated with trading forex:
  - A. Fluctuations in a country's interest rates may lead to fluctuations in a currency's value, thereby negatively impacting the ability to close a trade for a profit, and this information constitutes material facts;
  - B. Fluctuations in the foreign exchange rate between the time of placing a trade and the time of closing a trade may negatively impact the price of a forex contract, and this information constitutes material facts:
  - C. A system or technical failure in a platform for executing trades may negatively impact the ability to close a trade for a profit, and this information constitutes material facts;
  - D. Leveraging transactions on margin, once called, may lead to substantial losses in excess of initial investments, and this information constitutes material facts; and
  - E. The fees associated with trading foreign currencies, and this information constitutes material facts.

# FRAUD AND THE RISKS ASSOCIATED WITH USING BITCOIN TO DEAL IN THE FOREX TRADING PROGRAM

- 43. In connection with the offer of investments in the forex trading programs, 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.

#### MISLEADING STATEMENTS ABOUT RISK

44. Respondents TradeGo Forex Exchange, Respondent Ameral, and Respondent Nielson are representing the trading program is low risk and investors cannot lose their principal. These statements are materially misleading or otherwise likely to deceive the public in light of the undisclosed risks identified herein.

## **CONCLUSIONS OF LAW**

- 1. The investments in the trading program 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 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' 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**

- 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.
- It is further ORDERED Respondents immediately CEASE AND DESIST from acting as a securities dealer or agent in Texas until Respondents are registered with the Securities Commissioner or are 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 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 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 23<sup>rd</sup> day of November, 2020.

TRAVIS J. ILES

Securities Commissioner