

1 **STATE OF WASHINGTON**  
2 **DEPARTMENT OF FINANCIAL INSTITUTIONS**  
3 **SECURITIES DIVISION**

4 IN THE MATTER OF DETERMINING  
5 Whether there has been a violation of the  
6 Securities Act of Washington by:

7 Tryp Technologies, Inc. and  
8 Robert John McNulty a.k.a. Bob McNulty,

9 Respondents

Order No. S-19-2791-21-SC01

**STATEMENT OF CHARGES AND  
NOTICE OF INTENT TO  
ENTER ORDER TO CEASE AND DESIST,  
TO IMPOSE FINES, AND TO CHARGE COSTS**

10 THE STATE OF WASHINGTON TO:

**Tryp Technologies, Inc.  
and  
Robert John McNulty**

11 **STATEMENT OF CHARGES**

12 Please take notice that the Securities Administrator of the state of Washington has reason to believe  
13 that Respondents Tryp Technologies, Inc. and Robert John McNulty a.k.a. Bob McNulty have each violated  
14 the Securities Act of Washington. The Securities Administrator believes those violations justify the entry of  
15 an order against the Respondents Tryp Technologies, Inc. and Robert John McNulty to cease and desist from  
16 such violations and to charge costs pursuant to RCW 21.20.390, and under RCW 21.20.395 to impose a fine.

17 The Securities Administrator finds as follows:

18 **TENTATIVE FINDINGS OF FACT**

19 **Respondents**

20 1. Tryp Technologies, Inc. (“Tryp”) is a Wyoming corporation with its principal place of  
21 business in Las Vegas, Nevada. Tryp is in the business of offering on demand ride sharing services in which  
22 the drivers pay the company a monthly fee in exchange for receiving 100% of fares, tips and other benefits.

23 2. Robert John McNulty, (“McNulty”) a resident of Henderson, Nevada, is the founder and Chief  
Executive Officer of Tryp.

1 **Prior Securities Law Violations**

2 3. On October 10, 1995, an Order was issued against McNulty by the U.S. District Court for the  
3 Southern District of New York, to which McNulty consented, permanently enjoining him from violations of  
4 various provisions of the federal securities laws, including antifraud. In the complaint filed by the Securities  
5 and Exchange Commission (“SEC”) in 1994, McNulty was charged with orchestrating a complex scheme to  
6 defraud investors by using the proceeds of securities offerings to finance the operations of affiliated  
7 companies rather than for the stated purpose of funding the issuers' operations. In connection with this  
8 scheme, McNulty and the other defendants caused false and misleading registration statements and reports  
9 to be filed with the SEC and caused the companies' books and records to be false. The Court also ordered  
10 McNulty to disgorge ill-gotten gains of \$70,000.

11 4. On May 8, 2013, the Pennsylvania Department of Banking and Securities (“Department”)  
12 entered a Final Order that affirmed the January 25, 2012 Summary Order to Cease and Desist against Robert  
13 J. McNulty and others from violations of state securities laws, including antifraud provisions. The  
14 Department alleged that McNulty failed to disclose the bankruptcy and NASD/FINRA bar from the  
15 brokerage industry of a co-respondent; that McNulty had been enjoined by the SEC in 1995 from violating  
16 federal securities laws; and that McNulty failed to disclose that promissory notes offered to investors were  
17 not registered or exempt from registration under federal securities laws.

18 **Nature of the Conduct**

19 5. In 2018, a Tryp agent told a Washington resident (“Resident”) about Tryp’s new ride sharing  
20 company that had a network marketing structure. The agent told the Resident that the Tryp compensation  
21 plan provided its drivers with 100% of the fare. The agent told the Resident that Tryp made its money by  
22 recruiting Influencers and Drivers who would pay a sign-up fee and a flat monthly fee. The agent told the  
23 Resident that signing up could enable one to receive Tryp Technologies stock options.

1           6.       McNulty spoke to the Resident by telephone and explained that Tryp would be putting  
2 millions into advertising and having endorsers such as Shaquille O’Neal.

3           7.       In a subsequent telephone call, McNulty told the Resident about the opportunity to buy  
4 \$100,000 of Tryp stock. The Resident told McNulty that the Resident could only afford to purchase \$25,000  
5 of shares. The Resident sent \$25,000 by wire to Tryp Technologies. Tryp sent the Resident a stock certificate  
6 for 33,000 shares of Tryp stock and representing a share price of about \$0.76 a share. McNulty previously  
7 told the Resident that when Tryp Technologies went public, the shares would be valued at about \$75 a share.

8           8.       Tryp emailed the Resident its Tryp Influencer “Compensation Plan” that explained the  
9 different ways one could earn compensation and the different forms of compensation that were available  
10 such as cash bonuses, vacation trips, vehicles and its “Stock Option Bonus Program.” To be eligible to qualify  
11 for the stock option program, Tryp required prospective Drivers to sign up as a “Driver Influencer” and pay  
12 a set-up fee of \$399 and a \$199 a monthly “Influencer Fee.”

13           9.       During 2018 and 2019, Tryp maintained a website at [www.tryp.com](http://www.tryp.com). On the website, Tryp  
14 advertised to potential drivers and Influencers that they were planning to provide ride share services in Seattle  
15 in the coming months. The Official Company Statement posted on the website said that Tryp was committed  
16 to providing Drivers with a stock option plan.

17           10.      Tryp and McNulty failed to provide the Resident with material information regarding the sale  
18 of Tryp stock and the opportunity to participate in the Tryp stock option plan such as failing to disclose  
19 McNulty’s litigation history, the risks of the investment and the financial condition of the company.

20           11.      Tryp and McNulty failed to have and provide a reasonable basis for the claim made to the  
21 Resident regarding a possible valuation of \$75 a share in a public stock offering of Tryp shares.

22           12.      To date, Tryp’s stock offering has not gone public.  
23

1 **Registration Status**

2 13. Tryp is not currently registered to sell securities in the state of Washington and has not previously  
3 been so registered.

4 14. McNulty is not currently registered as a securities salesperson or broker-dealer in the state of  
5 Washington and has not previously been so registered.

6 Based upon the above Tentative Findings of Fact, the following Conclusions of Law are made:

7 **CONCLUSIONS OF LAW**

8 1. The offer and/or sale of stock and stock option plan described above constitute the offer and/or  
9 sale of a security as defined in RCW 21.20.005(14) and (17).

10 2. Tryp and McNulty have each violated RCW 21.20.140, because, as set forth in the Tentative  
11 Findings of Fact, Respondents offered and/or sold securities for which no registration is on file with the  
12 Securities Administrator.

13 3. McNulty has violated RCW 21.20.040 by offering and/or selling said securities while not  
14 being registered as a securities salesperson or broker-dealer in the state of Washington.

15 4. Tryp and McNulty have each violated RCW 21.20.010, because, as set forth in the Tentative  
16 Findings of Fact, Respondents made untrue statements of material fact or omitted to state material facts  
17 necessary to make the statements made, in light of the circumstances in which they were made, not  
18 misleading.

19 **NOTICE OF INTENT TO ORDER THE RESPONDENT TO CEASE AND DESIST**

20 Based upon the above Tentative Findings of Fact and Conclusions of Law, the Securities  
21 Administrator intends to order, pursuant to RCW 21.20.390(1), that Tryp and McNulty, their agents and  
22 employees each shall cease and desist from violations of RCW 21.20.140 and RCW 21.20.010 and that  
23 Respondent McNulty shall cease and desist from violations of RCW 21.20.040.

1 **NOTICE OF INTENT TO IMPOSE FINES**

2 Pursuant to RCW 21.20.395, and based upon the Tentative Findings of Fact and Conclusions of Law,  
3 the Securities Administrator intends to order that:

4 Respondents Tryp and McNulty shall be jointly and severally be liable for and shall pay a fine of  
5 \$25,000.

6 **NOTICE OF INTENT TO CHARGE COSTS**

7 Pursuant to RCW 21.20.390, and based upon the Tentative Findings of Fact and Conclusions of Law,  
8 the Securities Administrator intends to order that Respondents Tryp and McNulty shall be liable for shall be  
9 jointly liable for and shall pay the costs, fees, and other expenses incurred in the administrative investigation  
10 and hearing of this matter, in an amount not less than \$9,000.

11 **AUTHORITY AND PROCEDURE**

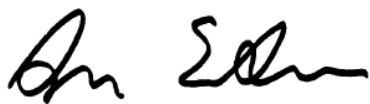
12 This Statement of Charges is entered pursuant to the provisions of Chapter 21.20 RCW and is subject  
13 to the provisions of Chapter 34.05 RCW. The Respondents Tryp and McNulty may each make a written  
14 request for a hearing as set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY  
15 FOR HEARING accompanying this Order. If a Respondent does not make a hearing request in the time  
16 allowed, the Securities Administrator intends to adopt the above Tentative Findings of Fact and Conclusions  
17 of Law as final and to enter a permanent order to cease and desist as to that Respondent, to impose any fines  
18 sought against that respondent, and to charge any costs sought against that Respondent.

19 Signed and Entered this \_\_\_\_\_ day of May, 2021.

22 \_\_\_\_\_  
23 William M. Beatty  
Securities Administrator

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Approved by:



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Suzanne Sarason  
Chief of Enforcement

Presented by:



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Martin Cordell  
Financial Legal Examiner

Reviewed by:



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Jack McClellan  
Financial Legal Examiner Supervisor