STATE OF WASHINGTON DEPARTMENT OF FINANCIAL INSTITUTIONS SECURITIES DIVISION

IN THE MATTER OF DETERMINING
 Whether there has been a violation of the
 Commodity Transactions Act by:

Order No. S-20-3045-22-CO01

CONSENT ORDER

5 Rosland Capital LLC, Marin Aleksov,

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Respondents

INTRODUCTION

9 Pursuant to the Commodity Transactions Act, RCW 21.30, the Securities Division and Respondents
10 Rosland Capital LLC and Marin Aleksov do hereby enter into this Consent Order in settlement of the matters
11 alleged herein. Respondents Rosland Capital LLC and Marin Aleksov neither admit nor deny the Findings of
12 Fact and Conclusions of Law as stated below.

FINDINGS OF FACT

Respondents

1. Rosland Capital LLC ("Rosland") is a Delaware entity formed on June 19, 2008 with its principal place of business located in Los Angeles, California. Rosland is in the business of offering and selling precious metals in the form of gold, silver, and platinum coins through its Internet website, through television advertising, and over the telephone.

2. Marin Aleksov resides in Los Angeles, California. Marin Aleksov is the Chief Executive Officer and the managing member and owns 55% of Rosland. Marin's brother, Julian Aleksov, owns the remaining 45% and is a director of Rosland. Julian Aleksov resides outside the United States.

Nature of the Offering

CONSENT ORDER

3. From December 2017 through at least April 2021, Rosland offered and sold gold, silver, and platinum coins to Washington self-directed IRA customers. During that time, Rosland sold more than \$1.6 million worth of gold, silver, and platinum coins with delivery delays of more than 28 days after payment to at least 14 Washington customers. The coins were shipped anywhere from 33 days to 168 days after the coins were purchased.

4. The Commodity Transactions Act of Washington (the "Act") regulates the offer and sale of commodities, including the offer and sale of gold, silver, and platinum coins. A commodity transaction does not include any transaction where the commodity is delivered within 28 days after payment. Any commodity that takes longer than 28 days for delivery does fall under the Act unless an exemption applies.

Registration Status

5. Rosland is not currently registered with the Commodity Futures Trading Commission as a futures commission merchant or as a leverage transaction merchant, and is not currently registered with the Department of Financial Institutions as a commodities broker-dealer or commodities sales representative under the Commodity Transactions Act, and has not previously been so registered.

6. Marin Aleksov is not currently registered with the Commodity Futures Trading Commission as a futures commission merchant or as a leverage transaction merchant, and is not currently registered with the Department of Financial Institutions as a commodities broker-dealer or commodities sales representative under the Commodity Transactions Act, and he has not previously been so registered.

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

CONCLUSIONS OF LAW

The gold, silver, and platinum coins described above are a commodity as defined in RCW
 21.30.010(9) and (17).

CONSENT ORDER

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2. The offer and/or sale of the gold, silver, and platinum coins constitutes the offer and/or sale of a commodity, commodity contract, or commodity option in the state of Washington as defined in RCW 21.30.010(10), (11), (14) and (15).

3. Respondents Rosland and Marin Aleksov violated RCW 21.30.020 because the Respondents offered and/or sold said commodity, commodity contract, or commodity option while not covered by an exemption under RCW 21.30.030, and the transaction or contract was not exempt under RCW 21.30.040.

4. Respondents Rosland and Marin Aleksov each violated RCW 21.30.050 because they offered and/or sold said commodity, commodity contract, or commodity option while not registered under the Commodity Futures Trading Commission as a futures commission merchant, or as a leverage transaction merchant, and while not registered as a commodities broker-dealer or commodities sales representative with the Department of Financial Institutions under the Commodity Transactions Act.

5. Respondent Marin Aleksov controlled Rosland in his role as Rosland's Chief Executive Officer and its managing member. Pursuant to RCW 21.30.070, Aleksov is therefore liable for any violation of the Commodity Transactions Act committed by Rosland and its employees, and to the same extent as Rosland and its employees.

Based upon the foregoing and finding it in the public interest:

CONSENT ORDER

IT IS AGREED AND ORDERED that Respondents Rosland Capital LLC and Marin Aleksov, and their agents and employees, shall each cease and desist from offering and/or selling any commodity, commodity contract, or commodity option in any manner in violation of RCW 21.30.020, the commodity transactions or options section of the Commodity Transactions Act.

IT IS AGREED AND ORDERED that Respondents Rosland Capital LLC and Marin Aleksov, and their agents and employees, shall each cease and desist from offering and/or selling any commodity,

CONSENT ORDER

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1	commodity contract, or commodity option in any manner in violation of RCW 21.30.050, the registration
2	section of the Commodity Transactions Act.
3	IT IS AGREED AND ORDERED that Respondents Rosland Capital LLC and Marin Aleksov shall
4	be jointly and severally liable for and pay a civil penalty in the amount of \$20,000.
5	IT IS AGREED that Respondents Rosland Capital LLC and Marin Aleksov enter into this Consent
6	Order freely and voluntarily and with a full understanding of its terms and significance.
7	IT IS AGREED that the Securities Division has jurisdiction to enter this order.
8	IT IS AGREED that in consideration of the foregoing, the Respondent waives their right to a hearing
9	and to judicial review of this matter pursuant to Chapter 34.05 RCW.
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11	WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.
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13	Signed this26 day of July, 2022
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15	Signed by:
16	Rosland Capital LLC
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18	Marin Aleksov CEO and Managing Member
19	Signed by:
20	Signed by.
21	 Marin Aleksov, Individually
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23	
	CONSENT ORDER DEPARTMENT OF FINANCIAL INSTITUTIONS
	Securities Division PO Box 9033 Olympia, WA 98507-9033 360-902-8760

1	Approved as to form by:
2 3	_/s/
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5	SIGNED and ENTERED this <u>4th</u> day of <u>August</u> , 2022
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7	Million M Seats
8	
9	William M. Beatty Securities Administrator
10	Approved by: Presented by:
11	G. II Jamet Do
12	Brian J. Guerard Janet So
13	Chief of Enforcement Financial Legal Examiner
14	Reviewed by:
15	Kungh
16	Huong Lam Financial Legal Examiner Supervisor
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360-902-8760