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**STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS
SECURITIES DIVISION**

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

24XploitTrade;

Respondent

Order No.: S-21-3099-21-SC01

STATEMENT OF CHARGES AND
NOTICE OF INTENT TO
ENTER ORDER TO CEASE AND DESIST,
TO IMPOSE A FINE,
AND TO CHARGE COSTS

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THE STATE OF WASHINGTON TO: 24XploitTrade

STATEMENT OF CHARGES

Please take notice that the Securities Administrator of the State of Washington has reason to believe that Respondent 24XploitTrade has violated the Securities Act of Washington. The Securities Administrator believes those violations justify the entry of an order against the Respondent to cease and desist from such violations and to charge costs pursuant to RCW 21.20.390, and under RCW 21.20.395 to impose a fine. The Securities Administrator finds as follows:

TENTATIVE FINDINGS OF FACT

Respondent

1. 24XploitTrade is an unincorporated entity that held itself out as a cryptocurrency trading platform with its principal place of business purportedly in London, England.

Overview

2. From approximately December 2020 to January 2021, 24XploitTrade defrauded A.H., a Washington resident, by making false or misleading claims about its cryptocurrency trading platform and offerings. Specifically, 24XploitTrade, or persons acting on its behalf, promised exorbitant returns using its

1 cryptocurrency trading program, then did not pay these returns and attempted to charge a 20% fee to A.H. to
2 withdraw the money she had supposedly earned through the trading program.

3 **Nature of the Conduct**

4 3. A.H. is a member of a Facebook community for persons interested in trading binary options,
5 and had, in late 2020, become interested in investing in Bitcoin. In December 2020, A.H. was contacted via
6 Facebook by a person claiming to be named Sarah Benson (“Benson”), who supposedly worked for
7 24XploitTrade. Benson solicited A.H. to invest in cryptocurrency through 24XploitTrade, and claimed that
8 24XploitTrade had a program that could turn \$100 of cryptocurrency investment into \$930 in one week.
9 Benson communicated with A.H. only through Facebook and WhatsApp.

10 4. In reliance on Benson’s claims, A.H. established an account on 24XploitTrade’s website in
11 mid-December 2020, purchased \$100 of Bitcoin, then transferred it to a cryptocurrency wallet purportedly
12 maintained by 24XploitTrade. A.H. did not direct or manage any cryptocurrency trades with these funds, but
13 relied on 24XploitTrade to do so. After about two weeks, A.H.’s account showed that her initial \$100 was
14 worth \$14,000. However, when she attempted to withdraw her earnings from the account, Benson told her
15 that she would need to pay an additional \$2800 in fees before making a withdrawal. Neither 24XploitTrade
16 nor Benson had previously disclosed these fees to A.H., who ultimately did not pay the money.

17 5. In soliciting A.H. to invest in its cryptocurrency trading program, 24XploitTrade
18 misrepresented or failed to disclose material information. For example, 24XploitTrade failed to disclose any
19 information about its cryptocurrency trading strategy, including how the strategy worked generally, how it
20 could earn a 930% return in one week, and any risks associated with earning such a return.

21 6. 24XploitTrade failed to respond to a subpoena from the Securities Division for information
22 concerning its transactions with Washington residents. Additionally, although its purported location is at a
23 residential address in London, IP address information provided by 24XploitTrade’s domain registrar indicates

1 that the site is operated from an African IP address, most likely Nigeria.¹ The Securities Division was also
2 unable to find any record showing that 24XploitTrade is registered with any UK financial authority.

3 **Registration Status**

4 7. 24XploitTrade is not, and has never been, registered in any capacity in the State of Washington,
5 including as a broker-dealer or securities salesperson.

6 8. 24XploitTrade's cryptocurrency trading program is not registered as a security in the State of
7 Washington.

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

9 **CONCLUSIONS OF LAW**

10 1. The offer and/or sale of the cryptocurrency trading program described above constitute the
11 offer and/or sale of a security as defined in RCW 21.20.005(14) and (17).

12 2. 24XploitTrade has violated RCW 21.20.140, because, as set forth in the Tentative Findings of
13 Fact, it offered and/or sold securities for which no registration is on file with the Securities Administrator.

14 3. 24XploitTrade violated RCW 21.20.010, because, as set forth in the Tentative Findings of Fact,
15 it made untrue statements of material fact or omitted to state material facts necessary to make the statements
16 made, in light of the circumstances in which they were made, not misleading.

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19 ¹ The Securities Division also found numerous similar-looking websites operated by the same account at the domain registrar,
20 including the following: 24xploittrade.com; abitexpert.com; abitoptions.com; affixtrade.com; amymaxtrade.com;
21 apexfxcapital.com; astrobitminers.co.uk; astrologyfxtrade.com; astrologyfxtrade.co.uk; astrosignalsfx.com; bamexcf.com;
22 bamexcfds.co.uk; baxchain.com; bestfxoption.com; betexptions.com; birexoptions.com; bminingcompany.com; cbc-
23 intercontinental.com; coinlog.net; companieshouses.uk; cryptoexchangesecurity.com; cryptoexchangesecurity.top;
cryptoprofxmarket.com; cryptotraderbroker.com; defexlogistics.com; endole-license.cok.uk; epextrade.com; expertuniontrade.com;
forexbeg.com; fxgoldentrade.com; fxgoldentrade.co.uk; fxtradeguard.top; gbedu.com; hexatrade.com; hexatrade.live;
hexatrade.website; interfxtrade.com; ironfacenetwork.com; liveoptiontrade.com; marketreview.top; nimestrade.com;
offshorecreditubank.com; oscafx.com; policescamreport.com; policescamreport.top; rhemabc.online; smartfxindex.com;
upbitexchange.com; vadwellfx.com; vadwelltrade.com; wamexcf.com; wavefxcapital.com; weltradefx.online; and
xploittrade.com. While these websites are not being charged with violating the Securities Act, consumers should exercise caution
when deciding whether to do business with them.

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

2 Based upon the above Tentative Findings of Fact and Conclusions of Law, the Securities
3 Administrator intends to order, pursuant to RCW 21.20.390(1), that Respondent 24XploitTrade, and its agents
4 and employees, each shall cease and desist from violations of RCW 21.20.010 and RCW 21.20.140.

5 **NOTICE OF INTENT TO IMPOSE FINES**

6 Pursuant to RCW 21.20.395, and based upon the Tentative Findings of Fact and Conclusions of Law,
7 the Securities Administrator intends to order that Respondent 24XploitTrade shall be liable for and shall pay
8 a fine of \$20,000;

9 **NOTICE OF INTENT TO CHARGE COSTS**

10 Pursuant to RCW 21.20.390, and based upon the Tentative Findings of Fact and Conclusions of Law,
11 the Securities Administrator intends to order that Respondents 24XploitTrade shall be liable for and shall pay
12 the costs, fees, and other expenses incurred in the administrative investigation and hearing of this matter, in
13 an amount not less than \$1,000.

14 **AUTHORITY AND PROCEDURE**

15 This Statement of Charges is entered pursuant to the provisions of Chapter 21.20 RCW and is subject
16 to the provisions of Chapter 34.05 RCW. The Respondent, 24XploitTrade, may make a written request for a
17 hearing as set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR
18 HEARING accompanying this Order. If a Respondent does not make a hearing request in the time allowed,
19 the Securities Administrator intends to adopt the above Tentative Findings of Fact and Conclusions of Law
20 as final and to enter a permanent order to cease and desist as to that Respondent, to impose any fines sought
21 against that respondent, and to charge any costs sought against that Respondent.

22 Signed and Entered this 6th day of October, 2021.
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William M. Beatty
Securities Administrator

Approved by:



Suzanne Sarason
Chief of Enforcement

Presented by:



Adam N. Yeaton
Financial Legal Examiner