STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION

IN THE MATTER OF:

STOCKINVESTMENTFX,
POLA WHITE, whose identity is otherwise unknown, and 1 Other Trading Website Purported to be Established by POLA WHITE and Identified in Exhibit A to this Order,

TRADESQUARES,
KINGSLEY OTEDJERE, whose identity is otherwise unknown, and 112 Other Trading Websites Purported to be Established by KINGSLEY OTEDJERE and Identified in Exhibit B to this Order,

STOCKSIGS,
MICHAEL FLEMING, whose identity is otherwise unknown, and 7 Other Trading Websites Purported to be Established by MICHAEL FLEMING and Identified in Exhibit C to this Order

RESPONDENTS

ADMINISTRATIVE ORDER
NO. CD-2022-0014

CEASE AND DESIST ORDER

The Alabama Securities Commission ("Commission"), having the authority to administer and provide for the enforcement of all provisions of Title 8, Chapter 6, Code of Alabama 1975, the Alabama Securities Act ("Act"), upon due consideration of the subject matter hereof, has determined as follows:

RESPONDENTS

1. STOCKINVESTMENTFX ("STOCKINVESTMENTFX") is an online entity that purports to be an online crypto currency, commodities, stocks, contract for difference, and foreign exchange trading platform, having a business address of 1074 Beeghley Street, Huntsville, Alabama 35816. STOCKINVESTMENTFX is accessible via the website
https://stockinvestmentfx.com and may be served through its domain registrar **NAMESILO** located at 8825 North 23\textsuperscript{rd} Avenue, Suite 100, Phoenix, AZ 85021 via legal@namesilo.com.

2. **POLA WHITE**, whose identity is otherwise unknown, is the owner of **STOCKINVESTMENTFX** and the 1 other trading website identified in Exhibit A to this order. **STOCKINVESTMENTFX** and the other 1 trading website purport to be online trading platforms and may be served through their domain registrar **NAMESILO** located at 8825 North 23\textsuperscript{rd} Avenue, Suite 100, Phoenix, AZ 85021 via legal@namesilo.com.

3. **TRADESQUARES** ("**TRADESQUARES**") is an online entity that purports to be an online crypto currency, commodities, stocks, contract for difference, and foreign exchange trading platform, having a business address of 1074 Beeghley Street, Huntsville, Alabama 35816. **TRADESQUARES** is accessible via the website https://tradesquares.net and may be served through its domain registrar **NAMECHEAP, INC** located at 4600 East Washington Street, Suite 305, Phoenix, AZ 85034 via legal@namecheap.com.

4. **KINGSLEY OTEDJERE**, whose identity is otherwise unknown, is the owner of **TRADESQUARES** and the 112 other trading websites identified in Exhibit B to this order. **TRADESQUARES** and the other 112 trading websites purport to be online trading platforms and may be served through their domain registrar **NAMECHEAP, INC** located at 4600 East Washington Street, Suite 305, Phoenix, AZ 85034 via legal@namecheap.com.

5. **STOCKSIGS** ("**STOCKSIGS**") is an online entity that purports to be an online crypto currency, commodities, stocks, contract for difference, and foreign exchange trading platform, having a business address of 1074 Beeghley Street, Huntsville, Alabama 35816. **STOCKSIGS** is accessible via the website https://stocksigs.com and may be served through its domain registrar **NAMECHEAP, INC** located at 4600 East Washington Street, Suite 305, Phoenix, AZ 85034 via legal@namecheap.com.

6. **MICHAEL FLEMING**, whose identity is otherwise unknown, is the owner of **STOCKSIGS** and the 7 other trading websites identified in Exhibit C to this order. **STOCKSIGS**
and the other 7 trading websites purport to be online trading platforms and may be served through their domain registrar NAMECHEAP, INC located at 4600 East Washington Street, Suite 305, Phoenix, AZ 85034 via legal@namecheap.com.

STATEMENT OF FACTS

7. On February 23, 2022, an online complaint was forwarded to the Commission from the New York State Office of the Attorney General by way of the Alabama Office of the Attorney General regarding an investment made with a crypto currency trading platform named STOCKINVESTMENTFX. The victim first contacted Catalina Vladimir (Vladimir) after seeing her name in the comments section of a YouTube video. According to Vladimir’s Instagram page, she claimed to be a financial consultant, forex expert, expert crypto trader and trusted manager.

8. Vladimir advised the victim, “I will have to create an investment account for you over here to avoid errors and loss of signals during trading due to IP difference and proxy server errors, I will create it here with our unique system and fund it here as well then link it to my trading system to generate winning signals for trading to gives you tentative trades and earn you huge profits weekly.” Vladimir also advised the victim, “I will be the one to handle everything about your trading and management..., you will have access to your trade account and you will be able to monitor it while I trade on your behalf... you don’t have to trade... I charge 20% of your profit earn as my commission.”

9. Vladimer instructed the victim how to set up a crypto currency wallet, fund it, and send the first investment of 0.020602 BTC ($774.30) on February 4, 2022, to her to fund the victim’s trading account. Vladimer then requested the victim’s full name, email address, cell number, sex, date of birth, address, country, city, to set up the victim’s trading account at stockinvestmentfx.com.

10. After the victim’s trading account was established, the victim received an email that stated, “Before your account can start earning profits it’s need to be activated. To do that you will need a software that will synchronized your investment account to company trading portal. And the software is called Signals, which is an algorithm automated robotic signal. The Signals suitable
for your investment account is called Meta trader4 (MT4) V3.6.2.1.0.1 It’s at a net cost of $690.00 USD.” After receiving the email, the victim suspected a scam and stopped all communications.

11. The investigation revealed the STOCKINVESTMENTFX business address of 1074 Beeghley Street, Huntsville, Alabama 35816, does not exist and there were multiple online trading platforms representing a business address of 1074 Beeghley Street, Huntsville, Alabama 35816. Two other trading platforms representing a business address of 1074 Beeghley Street, Huntsville, Alabama 35816 were TRADESQUARES and STOCKSIGS.

12. Legal process served during the investigation revealed the owner of STOCKINVESTMENTFX was NameSilo Username “polawhite” with NameSilo subscriber name of POLA WHITE. It further revealed “polawhite” had created 1 more website through NameSilo with the same business address of 1074 Beeghley Street, Huntsville, Alabama 35816. The websites have similar names such as the changing of only a few characters, the same manner of headers, navigation bars, main menus, mega menus, feature images, hero images, and footers. See Exhibit A for the aforementioned 1 website that operates in the same manner as STOCKINVESTMENTFX.

13. Legal process served during the investigation revealed the owner of TRADESQUARES was Namecheap Inc. Username “Otedjere” with Namecheap Inc. subscriber name of KINGSLEY OTEDJERE. It further revealed “Otedjere” had created 112 more websites through NameCheap Inc. that have similar names such as the changing of only a few characters, the same manner of headers, navigation bars, main menus, mega menus, feature images, hero images, footers, and business addresses in Huntsville, Alabama.

14. Legal process served during the investigation revealed the owner of STOCKSIGS was Namecheap Inc. username “michaelflem” with Namecheap Inc. subscriber name of MICHAEL FLEMING. It further revealed “michaelflem” had created 7 more websites through NameCheap Inc. that have similar names such as the changing of only a few characters, the same manner of headers, navigation bars, main menus, mega menus, feature images, hero images, and footers.
15. IP addresses analyzed that were used by "POLA WHITE, KINGSLEY OTEDJERE, and MICHAEL FLEMING" when logging in, conducting transactions, placing orders, and creating domains on Namecheap Inc. and NameSilo originated from around the globe.


17. A review of the Alabama Secretary of State's online database revealed no record for the RESPONDENTS as domestic or foreign businesses.

18. A review of the websites that were created by POLA WHITE, KINGSLEY OTEDJERE, and MICHAEL FLEMING were checked in the National Futures Association (NFA) Basic database and none of the websites were registered.

CONCLUSIONS OF LAW

19. Pursuant to section 8-6-2(10), Code of Alabama, 1975, the definition of a security includes investment contracts and profit-sharing agreements. The investment plans outlined by RESPONDENTS require the investment of money in the investment program managed by RESPONDENTS from which the investor expected profits to be derived from the efforts of RESPONDENTS and therefore, are securities as defined by the Act.

20. Pursuant to section 8-6-2(18), Code of Alabama, 1975, an Investment Adviser is any person who, for compensation, advises others, either directly or indirectly, as to the value of, or the advisability of investing in securities. The definition includes those who manage portfolios or the accounts of other investors. RESPONDENTS represented that they managed and traded the account of the investor and therefore, are Investment Advisers as defined in the Act.

21. Pursuant to section 8-6-3(a), Code of Alabama, 1975, it is unlawful for any person to transact business in this State as a dealer or agent for securities unless such person is registered under the Act. RESPONDENTS represented their business headquarters were in Alabama,
affected securities transactions for a victim and were not registered as a securities dealer in the state of Alabama in violation of the Act.

22. Pursuant to section 8-6-17(b)(2), Code of Alabama, 1975, it is unlawful for any person who receives, directly or indirectly, any consideration from another person for advising the other person as to the value of securities or their purchase or sale, whether through the issuance of analyses or reports or otherwise to employ any device, scheme, or artifice to defraud the other person. **RESPONDENTS** promised excessive returns to investors, reported fictitious account values, and imposed undisclosed fees in violation of the Act.

This Order is appropriate in the public interest for the protection of investors and is consistent with the purposes of the Act.

This Order does not prevent the Commission from seeking such other civil or criminal remedies that may be available to it under the Alabama Securities Act.

Additionally, if the allegations set forth herein are found to be true, through either administrative adjudication, failure of the **RESPONDENTS** to make a timely request for hearing, or default of the **RESPONDENTS**, it is the intention of the Commission to impose sanctions upon the **RESPONDENTS**. Such sanctions may include, inter alia, an administrative assessment imposed on **RESPONDENTS**, an additional administrative assessment for investigative costs arising from the investigation of the violations described herein against **RESPONDENTS**, and a permanent order to bar **RESPONDENTS** from participation in any securities-related industry in the State of Alabama.

**ACCORDINGLY, IT IS HEREBY ORDERED** that **RESPONDENTS** CEASE AND DESIST from further offers or sales of any security into, within or from the State of Alabama.

Entered at Montgomery, Alabama, this 27th day of June, 2022.
BY:

Edwin L. Reed
Deputy Director - Administration
IN THE MATTER OF:

STOCKINVESTMENTFX,
POLA WHITE, whose identity is otherwise unknown, and 1 Other Trading Website Purported to be Established by POLA WHITE and Identified in Exhibit A to this Order,
TRADESQUARES,
KINGSLEY OTEDJERE, whose identity is otherwise unknown, and 112 Other Trading Websites Purported to be Established by KINGSLEY OTEDJERE and Identified in Exhibit B to this Order,
STOCKSIGS,
MICHAEL FLEMING, whose identity is otherwise unknown, and 7 Other Trading Websites Purported to be Established by MICHAEL FLEMING and Identified in Exhibit C to this Order

RESPONDENTS

Exhibit A

wolvestradefx.com
IN THE MATTER OF:

STOCKINVESTMENTFX, POLA WHITE, whose identity is otherwise unknown, and 1 Other Trading Website Purported to be Established by POLA WHITE and Identified in Exhibit A to this Order,

TRADESQUARES, KINGSLEY OTEDJERE, whose identity is otherwise unknown, and 112 Other Trading Websites Purported to be Established by KINGSLEY OTEDJERE and Identified in Exhibit B to this Order,

STOCKSIGS, MICHAEL FLEMING, whose identity is otherwise unknown, and 7 Other Trading Websites Purported to be Established by MICHAEL FLEMING and Identified in Exhibit C to this Order,

RESPONDENTS

ADMINISTRATIVE ORDER NO. CD-2022-0014

Exhibit B

247tradecapitals.com
cointradespot.com
crypto24livetrading.com
cryptoexpert247.com
cryptoinvestmentproexchange.com
cryptoinvestments247.com
cryptoprofitearnerners.com
cryptotradingscore.com
destcrypto.com
eлитсолачэлдержининг.com
totopay.com
c-trade ltd.com
expertcoinmultipliers.com
expertcryptotraders.com
expertfxearnerners.com
expertinvestment247.com
expertstockearnerners.com
experttradeanalysis.com
financesolachelding.com
finallycrypto.com
firstbitcoininvestment.com
IN THE MATTER OF:

STOCKINVESTMENTFX,

POLA WHITE, whose identity
    is otherwise unknown, and 1 Other
    Trading Website Purported to be
    Established by POLA WHITE and
    Identified in Exhibit A to this Order,

TRADEQUARES,

KINGSLEY OTEDJERE, whose identity
    is otherwise unknown, and 112 Other
    Trading Websites Purported to be
    Established by KINGSLEY OTEDJERE
    and Identified in Exhibit B to this
    Order,

STOCKSIGS,

MICHAEL FLEMING, whose identity
    is otherwise unknown, and 7 Other
    Trading Websites Purported to be
    Established by MICHAEL FLEMING
    and Identified in Exhibit C to this Order

RESPONDENTS

Exhibit C

bitdoves.com
bitoxy24.com
hendersyield.com
kloooex.com
legendaryfxt.com
proavaras.com
sprouttrades.com