

**STATE OF ALABAMA  
ALABAMA SECURITIES COMMISSION**

**IN THE MATTER OF:** ) **ADMINISTRATIVE ORDER**  
 ) **NO. CD-2023-0025**  
**AGRIDIME, LLC.** )  
**JOSHUA LINK** )  
\_\_\_\_\_  
**RESPONDENTS** )

**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. AGRIDIME, LLC ("AGRIDIME") is a limited liability company organized under the laws of Texas on April 13, 2017, having a business address listed as 3000 South Hulen Street, Fort Worth, Texas, 76109. AGRIDIME operates at least one storefront located at 1019 N. Colorado Street, Ste. 100 Gilbert, Arizona 85233.

2. JOSHUA LINK ("LINK") is a co-owner and Executive Director of AGRIDIME and is a resident of Arizona.

**STATEMENT OF FACTS**

3. AGRIDIME advertises itself as a meat distribution company with a "Proprietary beef supply chain."

4. As of April 18, 2023, RESPONDENTS have operated the website Agridime.com/buy-cattle-here, which was accessible to Alabama residents and invites potential investors to "make money raising cattle without having to do all the work."

5. The AGRIDIME website identifies LINK as one of the co-owners and the Executive Director of the company.

6. Since at least October 10, 2021, AGRIDIME began advertising this investment on Facebook with an animated video titled “Make 15%-20% Yearly Returns by Purchasing Cattle With Us.”

7. According to AGRIDIME, there are two methods of cattle investment. Prior to September 2023, investors were solicited to “purchase” a steer or heifer for \$2,000 per head. The cattle would be raised by AGRIDIME’s contractors, and the funds were purportedly to be used to cover feed, healthcare, processing, and other expenses for the life of the cattle.

8. According to the website, the contract for this investment is not available to the investor until after the purchase is completed. Upon request, AGRIDIME will send a sample contract to potential investors.

9. The sample “Commercial Livestock Contract” obtained by the Commission contained no risk disclosures and the contract’s signing authority is “Josh Link, Co-Owner, Executive Director, Agridime, LLC.”

10. Once the cattle have been processed, AGRIDIME “sell[s] the beef to our online store and grocery store customers.” In exchange for their capital, investors are promised “guaranteed 15-20% yearly profits.” The guarantee is displayed frequently throughout AGRIDIME’S website, as in the example below:



#### BUY LIVE CATTLE

Have you ever wanted to make money raising cattle without having to do all the work?

We know it sounds too good to be true, however, in order to meet increased demand we are partnering with individuals and organizations to contract cattle into our beef supply chain.

We supply retail outlets, meat distributors and restaurant food service companies with farm fresh beef. We are inviting individuals and organizations to purchase cattle with us in order to supply beef to these customers.

All cattle purchased during Q2 of 2023 will be guaranteed 15-20% yearly profits. We also offer 20% yearly profits on contracts of 50 or more.

11. Beginning in September 2023, AGRIDIME changed their investment concept from \$2,000 per cow to \$4,500 per “bred cow.” The cow remains in the AGRIDIME supply chain while being fed and provided healthcare until giving birth. One year and seven days after investment, AGRIDIME will purchase the cow and calf for \$5,500 resulting in a guaranteed return of 22%.

12. On or about September 1, 2023, a sales consultant with AGRIDIME solicited an investment to an Alabama resident. According to the sales consultant “[T]he contract works the exact same way except the bred cows cost you 4500 and then the buyback one year and 7 days later is 5500/head. That comes in at a little over 22%.”

13. Upon information and belief Respondents entered into at least one investment contract with an Alabama resident that included the following terms: the Alabama investor agrees to purchase five steers and/or heifers for \$2,000 per steer or heifer (\$10,000) and AGRIDIME agrees to pay 15% per year profit on those cattle. Guaranteed yearly profits of 15%.

14. The contract is signed by LINK and includes instructions on how the resident could issue their investment funds to AGRIDIME via wire or ACH transfer.

15. There are no risk disclosures on the investment contract issued to the Alabama investor.

16. A review of the registration files of the Commission revealed no registration for RESPONDENTS in any capacity as of September 13, 2023.

17. A review of the Alabama Secretary of State’s online database revealed no record for a domestic or foreign business registered in Alabama for RESPONDENTS.

## CONCLUSIONS OF LAW

18. Pursuant to Section 8-6-2(10), Code of Alabama 1975, the definition of "security" includes an investment contract. The "commercial livestock contracts" offered and made available from RESPONDENTS to Alabama citizens in which investors invest monetary value in the purchase of cattle from which profits would be derived from the efforts of RESPONDENTS are investment contracts and such contracts are securities as defined by the Act.

19. Pursuant to Section 8-6-2(5), Code of Alabama 1975, the definition of "issuer" includes "every person who proposes to issue, has issued, or shall hereafter issue any security." RESPONDENTS are representing themselves to be issuing securities in the form of investment contracts and are issuers as defined by the Act.

20. Pursuant to Section 8-6-2(2), Code of Alabama 1975, the definition of an "agent" includes any individual who represents a dealer or issuer in attempting to affect the sale of a security. LINK represents AGRIDIME, an unregistered issuer, in attempting to affect the sale of securities, the investment contracts called "commercial livestock contract," and is an agent as defined by 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. Additionally, it is unlawful to employ any person as an agent for sale of securities unless that person is registered. AGRIDIME employed LINK, an unregistered agent, to assist in effecting sales of securities on behalf of AGRIDIME, the "commercial livestock contract," in violation of the Act. LINK acted as an agent of AGRIDIME while not registered as such with the Commission in violation of the Act.

22. Pursuant to Section 8-6-4, Code of Alabama 1975, it is unlawful to offer any security in this state unless it is registered under the Act or is subject to a perfected exemption from registration. RESPONDENTS offered a security to an Alabama citizen while that security was not registered, nor subject to a perfected exemption from registration in violation of the Act.

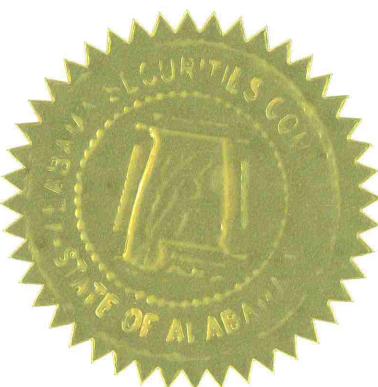
This Order does not prevent the Commission from seeking such other civil or criminal remedies that are available to it under the Act.

This Order is appropriate in the public interest for the protection of investors and is consistent with the purposes of the 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 a 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 the RESPONDENTS, an additional administrative assessment for investigative cost arising from the investigation of the violation(s) described herein against the RESPONDENTS, and a permanent order to bar the RESPONDENTS from participation in any securities related industry in the state of Alabama.

**ACCORDINGLY, IT IS HEREBY ORDERED** that the **RESPONDENTS** immediately **CEASE AND DESIST** from further violations of the Act.

Entered at Montgomery, Alabama, this 20<sup>th</sup> day of November 2023.



ALABAMA SECURITIES COMMISSION  
P.O. Box 304700  
Montgomery, AL 36130-4700  
(334) 242-2984  
BY:

A handwritten signature in blue ink that appears to read "Amanda Senn".

Amanda Senn  
Director