

**STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION**

IN THE MATTER OF:

SMARTLNL.COM

RESPONDENT

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ADMINISTRATIVE ORDER

NO. CD-2025-0011

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:

RESPONDENT

1. **SMARTLNL.COM ("SMARTLNL")** is an entity that purports to be a cryptocurrency trading platform. **SMARTLNL** was accessible through the website www.smartlnl.com and may be served through the domain registrar, Gname.com Pte. Ltd. via electronic mail at complaint@gname.com.

STATEMENT OF FACTS

2. On February 19, 2025, a complaint was received by the Commission from an Alabama resident regarding an investment made with a cryptocurrency trading platform named **SMARTLNL**. The Alabama resident encountered the suspect after receiving a WhatsApp text message. After a few days of casual conversation, the suspect stated they earned passive income by doing *"30s ultra-short-term options trading, including gold and cryptocurrencies, using market fluctuations to make two-way profits. Whether the market does up or down, we can get 40% profit."* The suspect advised the Alabama resident they could also teach them how to earn 40% profit.

3. The suspect then sent the Alabama resident a link to the **SMARTLNL** website and began advising the Alabama resident how to purchase cryptocurrency and send it to the **SMARTLNL** trading platform. The Alabama resident created an account at **SMARTLNL** and began funding it with cryptocurrency. The Alabama resident then began trading with the suspect's guidance and began to see their account increase in unrealistic amounts and continued to watch it increase without attempting any withdrawals.

4. During the trading at **SMARTLNL**, the Alabama resident needed a minimum amount of cryptocurrency to participate in a trade that guaranteed a larger return. The Alabama resident did not have the funds, so they borrowed cryptocurrency in the form of a loan from the suspect to meet the minimum investment requirement. After four weeks of trading, the Alabama resident attempted to withdraw their funds but was unable to do so because their account had been locked due to not repaying the loan. The Alabama resident was advised the loan had to be repaid from an outside wallet address and could not be paid back from the balance they held at **SMARTLNL**. The Alabama resident then suspected a scam and notified the Commission.

5. The Alabama resident sent cryptocurrency in the below asset and blockchain to a wallet address at **SMARTLNL**:

- BTC: 351CzfgY8XFDjbT9y3X7kBawGS7KXkkyED
- USDC: 0xd09c864593e1ff2b8a673f2239eb91bfe7f90f6e

CONCLUSIONS OF LAW

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

7. Pursuant to section 8-6-17(b)(1), 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. **RESPONDENT** 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 Act.

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

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

Entered at Montgomery, Alabama, this 1st day of April, 2025.

ALABAMA SECURITIES COMMISSION
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BY:



AMANDA L. SENN
Director

