

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

GA INVESTORS, and
JOHN DOES NOS. 1-4,

Defendants.

Civil Action No.

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff Securities and Exchange Commission (the “Commission”) alleges:

SUMMARY

1. This is an emergency enforcement action to stop GA Investors and John Does Nos. 1-4 (collectively, “Defendants”), the unknown owners and operators of dozens of fraudulent websites, including GA-Investors.org, from engaging in an ongoing fraudulent scheme. Defendants are soliciting investors by falsely impersonating legitimate companies and/or falsely promising exorbitant returns—in some cases as high as 61.9% in 24 hours—for investments in various securities offerings, including crypto asset mining pools.

2. In reality, this is a fraud. Defendants have no connection to the legitimate companies they are claiming to be, they have already misappropriated thousands of dollars from investors, and they are actively perpetrating fraudulent securities offerings. Further, although GA-Investors.org is no longer accessible to the public, at least 26 of the Defendants’ websites are currently active, including the newly published and similarly

named GA-Investor.org (dropping the “s” in GA-Investors). GA-Investor.org contains the same false information and representations as GA-Investors.org.

3. By engaging in the conduct alleged, Defendants violated, and unless restrained and enjoined, will continue to violate, Section 17(a) of the Securities Act of 1933 (the “Securities Act”) [15 U.S.C. § 77q(a)] and Section 10(b) of the Securities Exchange Act of 1934 (the “Exchange Act”) [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5].

4. Because this fraud is ongoing and because of the danger that investor funds will continue to be accumulated by the Defendants and will be dissipated, the Commission seeks emergency preliminary relief, including: (a) an order prohibiting Defendants from continuing to violate Section 17(a) of the Securities Act and Section 10(b) of the Exchange Act and Rule 10b-5 thereunder; (b) an order freezing the assets of Defendants held for their direct or indirect benefit, and/or subject to their direct or indirect control; (c) an order freezing all direct or indirect proceeds of the misconduct described in the Complaint; (d) an order prohibiting Defendants from soliciting, accepting or depositing any monies obtained from investors pending the resolution of this action; (e) an order requiring Defendants to repatriate assets held outside the United States; (f) an order requiring an expedited accounting of the Defendants’ assets and liabilities; (g) an order restraining Defendants from destroying, concealing, or disposing of property or documents related to the conduct alleged in this Complaint; (h) an order providing for alternative service of process; and (i) an order requiring that Defendants’ fraudulent websites soliciting investments in securities offerings be taken down forthwith.

5. The Commission also seeks: (a) entry of permanent injunctions against Defendants, prohibiting them from further violations of Section 17(a) of the Securities Act

and Section 10(b) of the Exchange Act and Rule 10b-5 thereunder; (b) disgorgement of all ill-gotten gains from the unlawful activity set forth in this Complaint, together with prejudgment interest, pursuant to Sections 21(d)(3) and 21(d)(7) of the Exchange Act [15 U.S.C. §§ 78u(d)(3) and (d)(7)]; (c) the imposition of civil monetary penalties pursuant to Sections 20(d) of the Securities Act [15 U.S.C. § 78t(d)] and Section 21(d)(3) of the Exchange Act [15 U.S.C. § 78u(d)(3)]; (d) conduct-based injunctions enjoining Defendants from directly or indirectly, including, but not limited to, through any entity owned or controlled by Defendants, participating in the purchase, offer or sale of any security to investors or potential investors, provided, however, that such injunction shall not prevent Defendants from purchasing or selling securities listed on a national securities exchange for their own personal accounts; and (e) such other relief as the Court may deem appropriate.

JURISDICTION AND VENUE

6. The Commission brings this action pursuant to the enforcement authority conferred upon it by Section 20(b) of the Securities Act [15 U.S.C. § 77t(b)] and Section 21(d) of the Exchange Act [15 U.S.C. § 78u(d)].

7. This Court has jurisdiction over this action pursuant to Section 22(a) of the Securities Act [15 U.S.C. § 77v(a)] and Sections 21(d), 21(e), and 27 of the Exchange Act [15 U.S.C. §§ 78u(d), 78u(e) and 78aa].

8. Venue lies in this District pursuant to Section 22(a) of the Securities Act [15 U.S.C. § 77(a)] and Section 27 of the Exchange Act [15 U.S.C. § 78aa], because certain of the acts, practices, transactions, and courses of business alleged in this Complaint occurred within the District, including soliciting and receiving investments from at least one Massachusetts resident.

9. In connection with the conduct described in this Complaint, GA Investors and John Does Nos. 1-4 have, directly or indirectly, made use of the means or instruments or instrumentalities of transportation or communication in interstate commerce, or of the mails, or the facilities of a national securities exchange.

10. Defendants' conduct took place in connection with the purchase or sale, and in the offer or sale, of securities.

DEFENDANTS

11. **GA Investors** ("GAI") is the entity that offered the securities described on the GA-Investors.org website and the GA-Investor.org website. GAI is not an incorporated entity in any jurisdiction and is not registered with the Commission. As described further below, GAI has impersonated and used the information of various legitimate companies, including names, addresses, website content, and stock trading information.

12. **John Does Nos. 1-4** ("DOES") are unknown individuals and/or groups of individuals responsible for and/or controlling GAI and GA-Investors.org, as well as dozens of other fraudulent websites offering securities. DOES include the individuals responsible for maintaining, organizing, and funding GA-Investors.org, as well as those persons responsible for constructing and advertising the securities offered by GAI. DOES communicated online with investors through aliases, including the alias "Brian K. Stafford."

FACTS

A. Defendants Offered Securities Through Dozens of Fraudulent Websites.

13. From at least March 2022 to the present, Defendants have offered investments through dozens of fraudulent websites. Some websites offer investments in traditional securities such as stocks and bonds, while other websites capitalize on the rise of crypto assets by offering investments in crypto asset mining pools. Some of the websites also

impersonate legitimate companies and/or promise exorbitant returns on investments, such as 61.9% in 24 hours. Over time, some of the websites have been taken down, while others remain publicly accessible on the Internet. A list of Defendants' known currently active websites is attached as Appendix A to this Complaint.

14. Through the websites, related social media sites, and via smartphone messaging applications, Defendants solicited investors from across the world, including investors in the United States, who invested approximately \$85,000 in GAI's fraudulent securities offerings on the now-defunct GA-Investors.org website.

15. GAI impersonated legitimate companies by misappropriating authentic information for fraudulent use on the GA-Investors.org website. Some of the genuine information that GAI falsely claimed as its own includes:

- a. That GAI's "District Office" is located at 6025 Metcalf Lane, Overland Park, Kansas 66202. In fact, a registered broker-dealer with a similar name—which has no affiliation with GAI or GA-Investors.org—is located at that address.
- b. That GAI's "Corporate Headquarters" is located in the "GA Investors Tower" at 301 E. Fourth St., Cincinnati, Ohio 45202. In fact, an insurance company with a similar name—which has no affiliation with GAI or GA-Investors.org—is located at that address.
- c. Stock trading data purportedly for GAI on both the London Stock Exchange and Johannesburg Stock Exchange. In fact, the stock trading data on GA-Investors.org belongs to a publicly-traded company which has no affiliation with GAI or GA-Investors.org.

16. GAI solicited investments in “Unit Trusts and [exchange-traded funds].” The GA-Investors.org website described the Unit Trusts as investments where “[y]our money is combined with the money of other investors and our investment managers use the pool of money to buy underlying investments, such as equities, bonds, cash and property” and “‘units’ . . . are allocated to you according to the amount of money you invest.”

17. GAI described the “Unit Trusts” as consisting of six “investment types,” which offered daily, guaranteed returns ranging from 2% to 4.5%, depending on the size of the investment. With respect to these investments in the Unit Trusts, GAI made numerous false statements on the GA-Investors.org website and its affiliated social media accounts, including:

- a. “Profit is guaranteed.”
- b. “Your profit starts accumulating daily, and you can withdraw at any time.”
- c. “[Y]ou own the [GAI Trust] units until you decide to sell them.”

18. Each of the statements and representations in paragraph 17 concerning GAI’s investments were false and misleading because Defendants halted investor withdrawals and misappropriated invested assets.

19. To invest, GAI required individuals to create a private account on the GA-Investors.org website. These private account pages included, among other things, a digital wallet address that was controlled by GAI. Investors were then directed to purchase crypto assets from a separate crypto asset trading platform and transfer those crypto assets to GAI by sending them to the GAI wallet address listed on the private account page. Once the transfer was complete, investors were sent a confirmation email and could then view their investment on the private account page on the GA-Investors.org website.

20. GAI displayed to its investors on their private account pages accumulated profits on investments, when no such profits existed. Defendants, at times, permitted at least some investors to make small withdrawals from their accounts after investment. But when investors sought to recoup larger portions of their investment, Defendants concocted excuses for why the funds could not be withdrawn and then froze those accounts.

21. The investments that GAI offered for sale on GA-Investors.org are investment contracts, a type of security under Section 2(a)(1) of the Securities Act and Section 3(a)(10) of the Exchange Act.

B. Defendants Solicited Investors Online With False and Misleading Statements.

22. In addition to the numerous false and misleading representations contained on the GA-Investors.org website, DOES made numerous false statements about GAI and the securities offered by GAI in direct communications with investors and potential investors using instant messaging platforms on various social media sites and smartphone applications.

23. In direct communications with investors and potential investors, DOES identified themselves as an individual named “Brian K. Stafford,” representing that Stafford was a “stakeholder” in GAI who had recently been hired as its Chief Operating Officer, and claiming that he operated a nutrition business in Texas.

24. In reality, Stafford is an alias. DOES used the Stafford figurehead, fictitious biography, and photographs misappropriated from a real person’s social media sites to solicit investors around the world, including at least one Massachusetts investor. From approximately October 2022 to January 2023, DOES used the Stafford persona to make numerous false and misleading statements to the Massachusetts investor about GAI, including the following:

- a. “[Y]ou won’t lose money it works just like your bank.” (Oct. 27, 2022).

- b. GAI is “a blockchain leading company and an Insurance Company meaning that your account and investments are insured, it’s endorsed by Elon musk [sic] and Peter Smith and Insured by the FDIC.” (Oct. 27, 2022).
- c. To receive a profit, “you have to purchase the [crypto] coins and store them in your wallet so what GA does is to help you invest them, by purchasing more crypto mining equipments [sic] and machines to speed up their mining . . . and you receive returns daily.” (Nov. 3, 2022).
- d. “[C]rypto mining” with GAI will “earn profits daily;” “with mining you earn profits everyday;” and that after depositing money “to your GA wallet . . . your account would automatically start generating daily ROIs [returns on investment].” (Oct. 26, 2022; Nov. 1, 2022; Nov. 4, 2022).

25. Each of the statements to the Massachusetts investor was false or misleading because GAI did not act like an FDIC insured bank, and investor assets were not invested in crypto mining or other projects. Rather, the Massachusetts investor’s funds were misappropriated by Defendants.

26. The Massachusetts investor agreed to invest approximately \$2,400 in GAI on or about November 4, 2022, expecting to receive a purported guaranteed daily 3% return, based on GAI’s misrepresentations as communicated by “Stafford” and posted on the GA-Investors.org website. From approximately November 11, 2022 to November 23, 2022, the Massachusetts investor invested approximately \$47,500 more in GAI, believing that all invested funds and purported profits could be withdrawn at any time.

27. From approximately November 30, 2022 to December 7, 2022, the Massachusetts investor was able to withdraw approximately \$15,000 from their GAI account.

However, when the Massachusetts investor subsequently attempted to withdraw additional money, GAI stated on December 19, 2022, that the account had been “suspended” and, subsequently on December 25, 2022, GAI stated that the Massachusetts investor would have to invest an additional \$40,000 to withdraw any more money.

28. On January 21, 2023, GAI informed the Massachusetts investor that they were “expected to make a \$20,000 deposit to unfreeze” the account.

29. At least three other investors invested a total of approximately \$35,000 in GAI, with similar claims by DOES, acting as Stafford, of exorbitant daily returns. These other investors were not able to withdraw any funds from GAI or the GA-Investors.org website.

C. Defendant DOES Own and/or Operate Dozens of Similar Fraudulent Websites and Smartphone Applications.

30. From at least March 2022 to the present, DOES have operated dozens of websites and smartphone applications through which they conducted similar fraudulent securities offerings, much as they did on GA-Investors.org, often using the same or similar templates and information. Since April 19, 2023, the GA-Investors.org website is no longer accessible, but many of DOES’ other websites and applications continue to offer similar investments in securities such as stocks, bonds, and exchange-traded funds, as well as investments in crypto asset mining, crypto asset ATMs, and other pooled investments. DOES continue to solicit investors through false statements, impersonating legitimate companies, and/or offering exorbitant returns on investment. For example, a website located at the URL GA-Investor.org (dropping the “s” in GA-Investors) is currently accessible to the public and contains the same information and representations reflected in paragraphs 15-17 above.

D. Defendants Acted With Scienter.

31. Defendants owned, controlled, and orchestrated the fraudulent GA-Investors.org website and offerings as well as the dozens of other related websites and smartphone applications, and therefore knew, or were reckless or negligent in not knowing, that the stated companies or persons were not who they claimed to be, they had no reasonable basis to advertise exorbitant returns, and there were no underlying investments in activities such as crypto asset mining pools.

NEED FOR EMERGENCY RELIEF

32. This is an ongoing fraud. Defendant DOES' fraudulent websites identified in Appendix A are currently accessible on the Internet, and Defendant DOES continue to use these to offer investments to the public. Potential investors continue to be able to place money in those investments. Further, although GA-Investors.org is no longer accessible to the public as of April 19, 2023, a website located at the URL GA-Investor.org is currently accessible to the public. The GA-Investor.org website contains the same information and representations as the GA-Investors.org website reflected in paragraphs 15 to 17 above. Emergency relief in the form of a temporary restraining order and, subsequently, preliminary injunction are necessary to stop Defendants' fraudulent solicitations and potential harm to the investing public.

33. Defendants will likely dissipate assets belonging to investors by transferring them outside the Court's jurisdiction.

34. The emergency relief requested is necessary in order to prevent further violations of the federal securities laws and further harm to investors, including further dissipation of investor assets.

35. The violations set forth in this Complaint involve fraud, deceit, manipulation, or deliberate or reckless disregard of a regulatory requirement, and such violations directly or indirectly resulted in substantial losses or created a significant risk of substantial losses to other persons.

FIRST CLAIM FOR RELIEF

Violations of Exchange Act Section 10(b) and Rule 10b-5 Thereunder (All Defendants)

36. Paragraphs 1 through 35 are re-alleged and incorporated by reference.

37. By engaging in the conduct described above, Defendants, singly or in concert with others, directly or indirectly, acting intentionally, knowingly or recklessly, by use of the means or instrumentalities of interstate commerce or of the mails, in connection with the purchase or sale of securities: (a) have employed, are employing, and are about to employ devices, schemes or artifices to defraud; (b) have made, are making, and are about to make untrue statements of material fact or have omitted, are omitting, and are about to omit to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; or (c) have engaged, are engaging, and are about to engage in acts, practices or courses of business which operate as a fraud or deceit upon certain persons.

38. By engaging in the foregoing conduct, the Defendants, directly and indirectly, violated, and unless enjoined, will again violate, Section 10(b) of the Exchange Act [15 U.S.C § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5].

SECOND CLAIM FOR RELIEF

**Violations of Securities Act Section 17(a)
(All Defendants)**

39. Paragraphs 1 through 35 are re-alleged and incorporated by reference.

40. By virtue of the foregoing, Defendants, singly or in concert with others, acting intentionally, knowingly or recklessly, or negligently, in the offer or sale of securities, by use of the means or instruments of transportation or communication in interstate commerce or by use of the mails: (a) have employed, are employing, and are about to employ devices, schemes or artifices to defraud; (b) have obtained, are obtaining, and are about to obtain money or property by means of untrue statements of material fact or omissions to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; or (c) have engaged, are engaging, and are about to engage in transactions, practices or courses of business which operate as a fraud or deceit upon the purchasers of the securities.

41. By virtue of the foregoing, Defendants, directly or indirectly, violated, and unless enjoined, will again violate, Section 17(a) of the Securities Act [15 U.S.C. § 77q(a)].

PRAYER FOR RELIEF

WHEREFORE, the Commission respectfully requests that this Court:

A. Enter a temporary restraining order which:

1. Restrains GAI and John Does Nos. 1-4, and each of their officers, agents, servants, employees, attorneys, and those persons in active concert or participation with them who receive actual notice of the order by personal service or otherwise, including facsimile transmission, electronic mail or overnight delivery service, from directly or indirectly violating Section 17(a) of the Securities Act [15 U.S.C. § 77q(a)] and Section

10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5].

2. Requires GAI and John Does Nos. 1-4, and each of their officers, agents, servants, employees, attorneys, and those persons in active concert or participation with them who receive actual notice of the order by personal service or otherwise, including facsimile transmission, electronic mail or overnight delivery service, to hold and retain all funds and other assets held for the direct or indirect benefit, or under the direct or indirect control, of GAI and John Does Nos. 1-4, to prevent any withdrawal, sale, payment, transfer, dissipation, assignment, pledge, alienation, encumbrance, diminution in value or other disposal of any such funds and other assets, including incurring charges or cash advances on any credit card, and to freeze such funds and other assets pending further order of this Court, and further require all banks, brokerage firms, other financial institutions, Internet payment agents, and other persons and entities which receive actual notice of the order by personal service or otherwise, including by facsimile transmission, electronic mail or overnight delivery service, and which hold any funds or other assets for the direct or indirect benefit, or under the direct or indirect control, of GAI and John Does Nos. 1-4, to hold and retain within their control and prohibit the withdrawal, sale, payment, transfer, dissipation, assignment, pledge, alienation, encumbrance, diminution in value or other disposal of any such funds and other assets;

3. Requires that all persons who hold or possess funds or other assets in the name, for the direct or indirect benefit, or under the direct or indirect control of the Defendants (including assets in the name of GA Investors or John Does Nos. 1-4), hold and retain such funds and other assets, prevent any withdrawal, sale, payment, transfer, dissipation, assignment, pledge, alienation, encumbrance, diminution in value or other

disposal of any or all such funds or other assets, and freeze such funds and other assets pending further order of this Court;

4. Restrains GAI and John Does Nos. 1-4 and each of their officers, agents, servants, employees and attorneys, and those persons in active concert or participation with them who receive actual notice of the order by personal service or otherwise, including facsimile transmission, electronic mail or overnight delivery service, from soliciting, accepting, or depositing into any account in which any of them has a direct or indirect beneficial interest or over which they exercise direct or indirect control, any funds or other assets obtained in connection with solicitations from actual or prospective investors pending the resolution of this action;

5. Requires that GAI and John Does Nos. 1-4, and each of their officers, agents, servants, employees and attorneys, and those persons in active concert or participation with them who receive actual notice of this Order by personal service or otherwise, including facsimile transmissions, electronic mail or overnight delivery service, and each of them, shall, within five (5) days of receiving actual notice of this Order, take such steps as are necessary to repatriate and deposit into the registry of the Court in an interest bearing account, any and all funds or assets that presently may be located outside of the United States that were obtained directly or indirectly from investors;

6. Requires GAI and John Does Nos. 1-4 to submit in writing and serve upon counsel for the Commission, within five (5) business days following service of the order, a written accounting identifying:

- a. all transfers or payments of funds to them or any other entity controlled by them from investors in connection with the misconduct described in the Complaint (the identification shall include the amount of each

such transfer or payment, the date of the transfer or payment, and the name, address, account number and financial institution or Internet payment agent of the party making and the party receiving the transfer or payment);

b. in detail, the precise disposition of each transfer or payment identified in response to paragraph 6.a above and all assets derived therefrom, including but not limited to:

- the nature and results of any investment in which the funds were used;
- any subsequent transfer or payment of the funds (the identification shall include the amount of each such transfer or payment, the date of the transfer or payment, the name, address, account number and financial institution of the party making and receiving the transfer or payment, and the reason for the transfer or payment); and
- any fees or expenses charged and a detailed statement of the nature and purpose of such fees and expenses.

c. by name and address, all persons, entities and accounts currently holding funds or assets derived from the transfers or payments described in paragraph 6.a above and the reason each received the funds or assets (the identification shall include the amount each received, the date received, the reason received, the institution and account number or location in which the funds or other assets are held and the name, address, account number and financial institution or Internet payment agent of the person or entity who provided each with the funds or other assets);

d. assets of every type and description that currently, or at the time of acquisition, has or had a value of at least one thousand dollars (\$1,000) presently owned by or held for the direct or indirect benefit, or subject to the direct or indirect control, of Defendants, whether in the United States or elsewhere; and

e. all accounts held at any bank, brokerage or other financial institution or Internet payment agent in the United States or elsewhere in the name, for the direct or indirect benefit, or under the direct or indirect control, of Defendants, or in which Defendants have or had any direct or indirect beneficial interest, at any time from January 1, 2022, to the present.

7. Restrains GAI and John Does Nos. 1-4 and each of their officers, agents, servants, employees and attorneys and those persons in active concert or participation with them who receive actual notice of the order by personal service or otherwise, including by facsimile transmission, electronic mail or overnight delivery service, from destroying, mutilating, concealing, altering, or disposing of any items, including but not limited to any books, records, documents, correspondence, contracts, agreements, assignments, obligations, tape recordings, computer media or other property relating to GAI and John Does Nos. 1-4 or any of their securities, financial, or other business dealings;

8. Provides that, pursuant to Rule 5 of the Federal Rules of Civil Procedure, service of all pleadings and other papers to be served in this action, including the Summons and Complaint, may be made by email, overnight delivery service, personally by any employee of the Commission who is not counsel of records in this matter, or any other person, or in any other manner authorized by Rule 5 of the Federal Rules of Civil Procedure, or by publication;

9. Requires GAI and John Does Nos. 1-4 to serve the statements and accountings required by the order and all other filings in this action on counsel for the Commission by email, messenger, overnight delivery service, or by facsimile to David H. London, U.S. Securities and Exchange Commission, 33 Arch Street, 24th Floor, Boston, Massachusetts 02110, LondonD@sec.gov, facsimile number (617) 573-4590; and

10. Requires that all websites associated with the Defendants that are making material misrepresentations relating to a securities offering, as identified in Appendix A, be taken down forthwith.

B. Enter a preliminary injunction extending the terms of the temporary restraining order described above;

C. Enter a permanent injunction which:

1. Restrains GAI and John Does Nos. 1-4 and each of their officers, agents, servants, employees, attorneys, and those persons in active concert or participation with them who receive actual notice of the order or injunction by personal service or otherwise, from directly or indirectly engaging in the conduct described above, or in conduct of similar purport and effect, in violation of:

a. Section 17(a) of the Securities Act [15 U.S.C. § 77q(a)], and

b. Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5];

2. Requires GAI and John Does Nos. 1-4 to disgorge their ill-gotten gains, including prejudgment interest, pursuant to Sections 21(d)(3) and 21(d)(7) of the Exchange Act [15 U.S.C. §§ 78u(d)(3) and (d)(7)];

3. Order GAI and John Does Nos. 1-4 to pay appropriate civil monetary penalties pursuant to Section 20(d) of the Securities Act [15 U.S.C. § 77t(d)] and Section 21(d)(3) of the Exchange Act [15 U.S.C. § 78u(d)(3)];

D. Enjoins GAI and John Does Nos. 1-4 from directly or indirectly, including, but not limited to, through any entity owned or controlled by GAI and/or John Does Nos. 1-4, participating in the purchase, offer or sale of any security to investors or potential investors, provided, however, that such injunction shall not prevent GAI and John Does Nos. 1-4 from purchasing or selling securities listed on a national securities exchange for their own personal accounts

E. Retain jurisdiction over this action to implement and carry out the terms of all orders and decrees that may be entered; and

F. Award such other and further relief as the Court deems just and proper.

JURY DEMAND

The Commission demands a jury in this matter for all claims so triable.

Dated: May 11, 2023

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION

By its attorneys,



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Appendix A

Website	Connection to GAI	Security Offered	Nature of Fraud
abotsmartcontract.com	Same domain registrar account as ga-investors.org	Stocks; bonds	Daily profits of 5-20%
affinitycapitals.com	Same domain registrar account as ga-investors.org	Stocks; ETFs	Daily profits of 5-12%
bluechip-brokers.com	Same domain registrar account as ga-investors.org	Stocks; ETFs	1-7-day profits of 4-90%
brix-finances.com	Same domain registrar account as ga-investors.org	Stocks	Daily profits of 0.5-5%
commercscapital.com	Same domain registrar account as ga-investors.org	Stocks; unit trusts	Impersonating legitimate company
elsavierfinance.com	Same domain registrar account as ga-investors.org	Stocks; ETFs	Daily profits of 5-14%
enkryptfinance.com	Sent to Investor A by Brian Stafford	Investment contracts; stocks; ETFs; options	Monthly profits of 13.5-25%
fortuneminters.com	Same domain registrar account as ga-investors.org	Stocks	Daily profits of 2.9-10%
g7capital.org	Same domain registrar account as enkryptfinance.com	Stocks; options	Impersonating legitimate company
ga-investor.org	Copy of ga-investors.org launched after ga-investors.org was removed	Investment contracts	Impersonating legitimate companies
galpcoin-invests.com	Same domain registrar account as ga-investors.org	Stocks; options	Claimed affiliation with legitimate company
gloprimeinvest.com	Same domain registrar account as ga-investors.org	Stocks	3-7-day profits of 2-10%
goldassetsmgtlimited.com	Same domain registrar account as ga-investors.org	Stocks	Daily profits of 2-3%
hemeraint.com	Same domain registrar account as ga-investors.org	Stocks	Daily profits of 1-5%
impacttrading.org	Same domain registrar account as ga-investors.org	Stocks	Daily profits of 18.2-43.2%
lerwick-financials.com	Same domain registrar account as ga-investors.org	Investment contracts	Daily profits of 10-30%
magnarinvestment.com	Same domain registrar account as ga-investors.org	Investment contracts	2-7-day profits of 12-50%
mettro-finance.com	Same domain registrar account as ga-investors.org	Investment contracts	2-7-day profits of 4.9-24.9%
oceanviewinvestment.com	Same domain registrar account as ga-investors.org	Investment contracts	Daily profits of 1.9-3%
prime-stake.com	Same domain registrar account as ga-investors.org	Investment contracts	1-7-day profits of 5-25%
ranfurtinvest.com	Same domain registrar account as ga-investors.org	Investment contracts	2-10-day profits of 2-10%
tab-finances.com	Same domain registrar account as ga-investors.org	Investment contracts	Daily profits of 3-5%
timestatictrading.com	Same domain registrar account as ga-investors.org	Stocks; bonds	Daily profits of 20.8-49.8%
tstradings.org	Same domain registrar account as ga-investors.org	Investment contracts	Daily profits of 1.5-5.5%
uptown-finance.com	Same domain registrar account as ga-investors.org	Investment contracts	Daily profits of 16.9-61.9%
westrockfinances.com	Same domain registrar account as ga-investors.org	Investment contracts	3-10-day profits of 2.1-5.1%