

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 83111 / April 26, 2018**

**INVESTMENT ADVISERS ACT OF 1940**  
**Release No. 4899 / April 26, 2018**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-18455**

**In the Matter of**

**Ikenna Ikokwu,**

**Respondent.**

**ORDER INSTITUTING  
ADMINISTRATIVE PROCEEDINGS  
PURSUANT TO SECTION 15(b) OF THE  
SECURITIES EXCHANGE ACT OF 1934  
AND SECTION 203(f) OF THE  
INVESTMENT ADVISERS ACT OF 1940,  
MAKING FINDINGS, AND IMPOSING  
REMEDIAL SANCTIONS**

**I.**

The Securities and Exchange Commission (“Commission”) deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted pursuant to Section 15(b) of the Securities Exchange Act of 1934 (“Exchange Act”) and Section 203(f) of the Investment Advisers Act of 1940 (“Advisers Act”) against Ikenna Ikokwu (“Respondent”).

**II.**

In anticipation of the institution of these proceedings, Respondent has submitted an Offer of Settlement (the “Offer”) which the Commission has determined to accept. Solely for the purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, and without admitting or denying the findings herein, except as to the Commission’s jurisdiction over him and the subject matter of these proceedings and the findings contained in paragraph III.2 below, which are admitted, Respondent consents to the entry of this Order Instituting Administrative Proceedings Pursuant to Section 15(b) of the Securities Exchange Act of 1934 and Section 203(f) of the Investment Advisers Act of 1940, Making Findings, and Imposing Remedial Sanctions (“Order”), as set forth below.

### III.

On the basis of this Order and Respondent's Offer, the Commission finds that:

1. Ikenna Ikokwu, age 42, is a resident of Cumming, Georgia and the founder, majority owner, and managing member of Winning the Money Game LLC ("Money LLC"), a Georgia state-registered investment adviser, and the founder, majority owner, and president of Winning the Money Game with Ike Inc. ("Ike Inc."), both of which purport to provide financial planning and investment advice. Ikokwu is responsible for the day-to-day operations of both entities, and is solely responsible for both soliciting new clients and providing investment advice. Ikokwu is a CPA currently licensed by the State of Georgia and a Certified Financial Planner. Ikokwu does not hold any securities licenses nor has he ever been registered with the Commission in any capacity. From 2012 through April 2014, Ikokwu acted as an unregistered broker or dealer by offering for sale and selling securities issued by FutureGen Inc. ("FutureGen") to persons in the United States in interstate commerce. Ikokwu received compensation for each sale of FutureGen securities without being registered.

2. On April 3, 2018, a final judgment was entered by consent against Ikokwu, permanently enjoining him from future violations of Section 17(a) of the Securities Act of 1933 ("Securities Act"), Sections 10(b) and 15(a)(1) of the Exchange Act and Rule 10b-5 thereunder, and Sections 206(1) and 206(2) of the Advisers Act, in the civil action entitled Securities and Exchange Commission v. Ikenna Ikokwu, et al., Civil Action Number 1:16-CV-01950, in the United States District Court for the District of Columbia.

3. The Commission's complaint alleged that, in connection with the sale of FutureGen securities, Ikokwu misled his clients and customers by, among other things, failing to disclose compensation received from FutureGen for each sale, falsely claiming that he had performed extensive due diligence into FutureGen, and touting his personal and family investments in FutureGen-related entities while failing to disclose that his largest investment was delinquent. The complaint also alleged that Ikokwu and Ike Inc. acted as unregistered broker-dealers by receiving commissions for the sale of FutureGen securities.

### IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanctions agreed to in Respondent Ikokwu's Offer.

Accordingly, it is hereby ORDERED pursuant to Section 15(b)(6) of the Exchange Act, and Section 203(f) of the Advisers Act, that Respondent Ikokwu be, and hereby is barred from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization; and

Pursuant to Section 15(b)(6) of the Exchange Act Respondent Ikokwu be, and hereby is barred from participating in any offering of a penny stock, including: acting as a promoter, finder, consultant, agent or other person who engages in activities with a broker, dealer or issuer for

purposes of the issuance or trading in any penny stock, or inducing or attempting to induce the purchase or sale of any penny stock, with the right to apply for reentry after 5 years to the appropriate self-regulatory organization, or if there is none, to the Commission.

Any reapplication for association by the Respondent will be subject to the applicable laws and regulations governing the reentry process, and reentry may be conditioned upon a number of factors, including, but not limited to, the satisfaction of any or all of the following: (a) any disgorgement ordered against the Respondent, whether or not the Commission has fully or partially waived payment of such disgorgement; (b) any arbitration award related to the conduct that served as the basis for the Commission order; (c) any self-regulatory organization arbitration award to a customer, whether or not related to the conduct that served as the basis for the Commission order; and (d) any restitution order by a self-regulatory organization, whether or not related to the conduct that served as the basis for the Commission order.

By the Commission.

Brent J. Fields  
Secretary