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

SECURITIES EXCHANGE ACT OF 1934 Release No. 85165 / February 19, 2019

**ADMINISTRATIVE PROCEEDING**File No. 3-19003

In the Matter of

TRUDY R. GILMOND,

Respondent.

ORDER INSTITUTING PUBLIC ADMINISTRATIVE PROCEEDINGS PURSUANT TO SECTION 15(b) OF THE SECURITIES EXCHANGE ACT OF 1934, 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") against Trudy R. Gilmond ("Respondent" or "Gilmond").

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 her 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 Public Administrative Proceedings Pursuant to Section 15(b) of the Securities Exchange Act of 1934, 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. Respondent Gilmond, age 48, is a resident of Vermont. At all relevant times, operating under the trade name "Team Fired Up," Gilmond marketed multi-level marketing programs. From at least September 2011 through August 2012, Gilmond engaged in the business of effecting transactions in securities for the account of others by working as an unregistered broker and soliciting investments in Rex Venture Group, LLC d/b/a ZeekRewards.com ("ZeekRewards"). Gilmond is not currently registered with the Commission in any capacity and was never associated with a broker-dealer registered with the Commission.
- 2. On June 21, 2017, a final judgment was entered against Gilmond, permanently enjoining her from future violations of Sections 5 and 17(a) of the Securities Act of 1933 ("Securities Act"), and Section 15(a) of the Exchange Act, in the civil action titled Securities and Exchange Commission v. Trudy R. Gilmond, Civil Action Number 3:15-cv-00591-GCM, in the United States District Court for the Western District of North Carolina (hereinafter "SEC v. Gilmond").
- 3. The Commission's complaint in <u>SEC v. Gilmond</u> alleged that, between September 2011 and August 2012, in connection with the fraudulent unregistered offer and sale of securities through Rex Venture Group, LLC d/b/a ZeekRewards.com ("ZeekRewards"), Gilmond made material misstatements and omissions to ZeekRewards investors concerning, among other things, ZeekRewards' promised 1.5% daily returns. The complaint further alleged that, in connection with her recruitment of investors for the ZeekRewards offerings, Gilmond engaged in the business of effecting transactions in securities for the accounts of others, all without registering as a broker. Finally, the complaint alleged that Gilmond used means of interstate commerce to offer and sell the ZeekRewards securities when no registration statement had been filed with the Commission or was in effect with respect to them, and when no exemption from registration was applicable.

## IV.

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

Accordingly, it is hereby ORDERED pursuant to Section 15(b)(6) of the Exchange Act that Respondent Gilmond 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

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.

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.

For the Commission, by its Secretary, pursuant to delegated authority.

Brent J. Fields Secretary