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AUSTIN, TEXAS 78711-3167

## Texas State Securities Board

ROBERT BELT  
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MEMBER

Phone: (512) 305-8300  
Facsimile: (512) 305-8310

208 E. 10th Street, 5th Floor  
Austin, Texas 78701-2407  
www.ssb.texas.gov

EJIKE E OKPA II  
MEMBER

SOAH DOCKET NO. 312-21-2937

TEXAS STATE SECURITIES BOARD,  
Petitioner,

§ BEFORE THE STATE OFFICE

v.

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OF

ADMINISTRATIVE HEARINGS

### TRUE BULLION LLC DBA GOLD SILVER INTERNATIONAL EXCHANGE DBA GSI EXCHANGE LLC

Service by certified mail, return receipt requested, addressed to (1) 4440 PGA Boulevard, #600, Palm Beach Gardens, Florida 33410; (2) 26635 West Agoura Road, #220, Calabasas, California 91302; (3) 3838 Oak Lawn Avenue, Dallas, Texas 75219; (4) its Registered Agent for Service of Process in Delaware, Harvard Business Services, Incorporated, at 16192 Coastal Highway, Lewes, Delaware 19958; (5) its Registered Agent for Service of Process in California, Anthony Allen Anderson, at 26635 West Agoura Road, #220, Calabasas, California 91302; and (6) its Registered Agent for Service of Process in Florida, Anthony Allen Anderson, at 4440 PGA Boulevard, #600, Palm Beach Gardens, Florida 33410.

### ANTHONY ALLEN ANDERSON

Service by certified mail, return receipt requested, addressed to (1) 4440 PGA Boulevard, #600, Palm Beach Gardens, Florida 33410; (2) 26635 West Agoura Road, #220, Calabasas, California 91302; and (3) 3838 Oak Lawn Avenue, Dallas, Texas 75219.

### NOTICE OF HEARING

This is your OFFICIAL NOTICE that a hearing will commence at **9:00 AM on OCTOBER 19, 2021** before an Administrative Law Judge. The hearing is being held via videoconference for the purpose of determining whether to issue a proposal for decision that orders True Bullion LLC dba Gold Silver International Exchange dba GSI Exchange LLC ("Respondent GSI Exchange") and Anthony Allen Anderson ("Respondent

**Anderson**") to pay a refund to all investors who purchased the services described herein on or after September 1, 2019, and were subject to the illegal and/or fraudulent acts set forth herein.

This hearing will be held pursuant to The Securities Act, Tex. Rev. Civ. Stat. Ann. arts. 581-1-581-45 (the "**Securities Act**"), the Rules and Regulations of the State Securities Board, 7 Tex. Admin. Code §§101.1-139.27 (2019) (Tex. State Sec. Bd.) (the "**Board Rules**"), the Administrative Procedure Act, Tex. Gov't Code Ann. §§2001.001-2001.902 (the "**Administrative Procedure Act**"), and the Rules of Practice and Procedure of the State Office of Administrative Hearings, 1 Tex. Admin. Code Chapter 155 (2019) (State Ofc. of Admin. Hearings) (the "**SOAH Rules**").

### THE PURPOSE OF THE HEARING

1. The Enforcement Division of the Texas State Securities Board (the "**Enforcement Division**") is bringing this action and praying for a proposal for a decision that orders Respondents to pay refunds to all investors who purchased the services described herein on or after September 1, 2019, and were subject to the illegal and/or fraudulent acts set forth herein.

### OVERVIEW OF THE CASE

2. Respondents GSI Exchange and Anderson are engaging in an illegal nationwide advisory scheme involving more than 450 investors and more than \$32 million in principal.
3. As part of the illegal nationwide advisory scheme, Respondents GSI and Anderson are advising investors to liquidate securities and use the proceeds to purchase precious metals.
4. Respondents are gouging investors, charging a fraudulent spread of as much as 30 percent or more on the front-end of the transactions.
5. As a result, trust records reflect investors have lost as much as 39 percent of their principal investment.
6. The Securities Commissioner is entering this emergency cease and desist order to protect the public from immediate and irreparable harm.

### RESPONDENT GSI EXCHANGE

7. On or about August 18, 2014, Respondent GSI Exchange organized as a limited liability company with the State of Delaware, Department of State, Division of Corporations.

8. On or about September 5, 2014, Respondent GSI Exchange filed an Application to Register a Foreign or Domestic Limited Liability Company with the California Secretary of State.
9. On or about March 5, 2018, Respondent GSI Exchange represented to the California Secretary of State that it was a "Coin Stamp Retailer."
10. The California Franchise Tax Board forfeited Respondent GSI Exchange for failure to meet tax requirements. Respondent GSI Exchange is no longer authorized to do business as a domestic or foreign limited liability company with the California Secretary of State.
11. On or about August 14, 2019, Respondent GSI Exchange announced it was opening its first regional office in Dallas, Texas.
12. Respondent GSI Exchange did not file or organize as a domestic or foreign limited liability company with the Texas Secretary of State. Respondent GSI Exchange is not authorized to do business as a domestic or foreign limited liability company with the Texas Secretary of State.

#### THE ILLEGAL ADVISORY SCHEME

13. Respondents are soliciting senior citizens and other persons residing in Texas and throughout the country.
14. Respondents are encouraging these potential investors to provide personal information, including financial information describing securities purchased from dealers and/or managed by investment advisers.
15. Respondents are representing these securities are not safe investments and maintaining ownership of these securities subject owners to significant risks of loss.
16. Respondents are then encouraging potential investors to protect their investments by liquidating their securities and using the proceeds to purchase precious metals through self-directed individual retirement accounts at STRATA Trust Company ("**STRATA Trust**").
17. They are claiming these investments in precious metals are reliable investments that will protect wealth regardless of market fluctuations, inflation and the devaluation of the dollar.
18. As part of the scheme, Respondents are assisting potential investors in liquidating their securities and transferring funds for the purchase of precious metals. The assistance includes, but is not limited to, contacting dealers and investment advisers and directing the liquidation of holdings and the sale of securities.

19. Respondents have already secured more than 450 clients from 44 states, and their transactions involve more than \$32 million.

INVESTOR EXAMPLE: R.H.

20. On or about July 20, 2020, an investor identified by his or her initials as R.H. purchased 413 gold coins from Respondent GSI Exchange for approximately \$647.20 per gold coin.
21. On or about the same day, Respondent GSI Exchange purchased the 413 gold coins from a coin wholesaler for approximately \$503.00 per, a difference of around 25 percent of the amount paid per gold coin by the investor.
22. STRATA Trust records reflect the market value of the gold coins was only \$473.03 per coin on December 31, 2020, a difference of around 27 percent of the amount paid per gold coin by the investor.

INVESTOR EXAMPLE: W.C. PART I

23. On or about July 23, 2020, an investor identified by his or her initials as W.C. purchased 186 gold coins from Respondent GSI Exchange for approximately \$704.05 per coin.
24. On or about the same day, Respondent GSI Exchange purchased the 186 gold coins from a coin wholesaler for approximately \$521.50 per gold coin, a difference of around 25 percent of the amount paid per gold coin by the investor.
25. STRATA Trust records reflect the market value of the coins was only \$473.03 per gold coin on December 31, 2020, a difference of around 33 percent of the amount paid per gold coin by the investor.

INVESTOR EXAMPLE: W.C. PART II

26. On or about July 23, 2020, W.C. also purchased 100 gold coins from Respondent GSI Exchange for approximately \$707.21 per gold coin.
27. On or about the same day, Respondent GSI Exchange also purchased the 100 gold coins from a coin wholesaler for approximately \$516.90 per gold coin, a difference of around 25 percent of the amount paid per gold coin by the investor.
28. STRATA Trust records reflect the market value of the gold coins was only \$473.03 per coin on December 31, 2020, a difference of around 33 percent of the amount paid per gold coin by the investor.

### INVESTOR EXAMPLE: W.C. PART III

29. On or about July 23, 2020, W.C. purchased 979 silver coins from Respondent GSI Exchange for approximately \$52.08 per silver coin.
30. On or about the same day, Respondent GSI Exchange purchased the 979 silver coins from a coin wholesaler for approximately \$37.54 per silver coin, a difference of around 25 percent of the amount paid per silver coin by the investor.
31. STRATA Trust records reflect the market value of the silver coins was only \$39.48 per coin on December 31, 2020, a difference of around 25 percent of the amount paid per silver coin by the investor.

### INVESTOR EXAMPLE: B.R. PART I

32. On or about March 4, 2020, an investor identified by his or her initials as B.R. purchased 250 gold coins from Respondent GSI Exchange for approximately \$612.12 per gold coin.
33. On or about the same day, Respondent GSI Exchange purchased the 250 gold coins from a coin wholesaler for approximately \$452.88 per, a difference of around 25 percent of the amount paid per gold coin by the investor.
34. On or about July 19, 2020, B.R. passed away. At the time of B.R.'s death, STRATA Trust records reflect the market value of the gold coins was only \$448.38 per gold coin, a difference of around 27 percent of the amount paid per gold coin by the investor.

### INVESTOR EXAMPLE: B.R. PART II

35. On or about March 4, 2020, B.R. also purchased 3,847 silver coins from Respondent GSI Exchange for approximately \$39.50 per silver coin.
36. On or about the same day, Respondent GSI Exchange purchased the 3,847 silver coins from a coin wholesaler for approximately \$29.48 per, a difference of around 25 percent of the amount paid per silver coin by the investor.
37. At the time of B.R.'s death, STRATA Trust records reflect the market value of the silver coins was only \$27.82 per silver coin, a difference of around 30 percent of the amount paid per silver coin by the investor.

### THE WAIVERS

38. Respondents are requiring investors to represent and warrant they possess the necessary knowledge, experience and financial resources to choose to purchase coins or other metals from Respondent GSI Exchange without reliance on any statement or information from Respondent GSI Exchange.

39. Respondents are also requiring investors to waive express and implied warranties and limit legal recourse for the potential investors.

#### THE WARNING AND INITIAL REQUEST TO CEASE AND DESIST

40. In February 2021, the Enforcement Division informed Respondents that Respondents may be acting as investment advisers and/or investment adviser representatives.
41. The Enforcement Division also informed Respondents they may be violating Sections 12 and 12-1, relating to the registration and notice-filing requirements of the Securities Act.
42. The Enforcement Division therefore requested Respondents immediately cease and desist from engaging in any acts or practices that may violation Sections 12 and 12-1 of the Securities Act.
43. Respondents failed to agree to cease and desist from engaging the acts or practices that may violation Sections 12 and 12-1 of the Securities Act and continued to perpetrate the advisory scheme set forth herein.

#### THE SUBPOENA

44. In February 2021, the Texas Securities Commissioner issued a subpoena that was served on Respondent GSI Exchange.
45. The subpoena demanded the production of records and indicated it was issued as part of an investigation to detect and prevent violations of the Securities Act.
46. After being served with the subpoena, Respondents GSI Exchange and Anderson continued to perpetrate the advisory scheme set forth herein.

#### THE CONCEALMENT AND OBSTRUCTION OF THE INVESTIGATION

47. After Respondents GSI Exchange and Anderson received the initial request to cease and desist and the subpoena, the Enforcement Division began contacting investors.
48. At the time, Respondents GSI Exchange and Anderson did not tell investors it was subpoenaed as part of an investigation to detect and prevent violations of the Securities Act, and it did not disclose its correspondence with the Enforcement Division.
49. Instead, Respondents GSI Exchange and Anderson falsely claimed the Enforcement Division was contacting investors for wholly unrelated reasons.

50. They explained the Enforcement Division was contacting them because “of a Gold and Silver supply-chain breakdown that hit many dealers that have not delivered metals to clients in the allotted 30-day period” and that the “Texas State Securities Board is just checking to make sure all clients’ orders are filled.”
51. They also encouraged investors to “respond with a simple **‘I’m pleased with GSI’**” to Joe Rotunda, the Director of the Enforcement Division.
52. Respondents GSI Exchange and Anderson continued to solicit these clients, telling them “Gold and Silver are in short supply and we should all load up now before they become unobtainable!”

### REGISTRATION VIOLATIONS

53. Respondent GSI Exchange is acting as an investment adviser because Respondent GSI Exchange is a person who, for compensation, is engaging in the business of advising another, either directly or through publications or writings, with respect to the value of securities or to the advisability of investing in, purchasing, or selling securities.
54. Respondent GSI Exchange has not been registered or notice-filed as an investment adviser with the Securities Commissioner pursuant to Sections 12 and 12-1 of the Securities Act at any time material hereto.
55. Respondent Anderson is acting as an investment adviser representative because he is a person who, for compensation, is employed, appointed, or authorized by Respondent GSI Exchange to solicit clients for Respondent GSI Exchange and he, on behalf of Respondent GSI Exchange, is providing investment advice to Respondent GSI Exchange’s clients.
56. Respondent Anderson has not been registered or notice-filed as an investment adviser representative with the Securities Commissioner pursuant to Section 12 and 12-1 or the Securities Act at any time material hereto.

### FRAUD AND DECEIT AND THE SPREAD

57. Respondents GSI Exchange and Anderson are or are about to, in connection with the rendering of investment advice, intentionally fail to disclose the magnitude of the difference between the purchase price charged by Respondent GSI Exchange and the purchase price charged by its coin wholesaler.
58. The scheme described herein also constitutes a device or other artifice to obtain an underwriting or promotion fee or profit, selling or managing commission or profit, so gross or exorbitant as to be unconscionable.

## FRAUD AND BUSINESS REPUTE, QUALIFICATIONS AND SUCCESS

59. Respondents GSI Exchange and Anderson are and/or are about to, in connection with the rendering of investment advice, intentionally fail to disclose the following material facts about their experience with financial services and products:
- A. Their business repute, qualifications and experience in advising another, either directly or through publications or writings, with respect to the value of securities or to the advisability of investing in, purchasing, or selling securities;
  - B. Their business repute, qualifications and experience in forecasting economic conditions, such as the likelihood of recessions and the possibility of inflation, as well as predicting the exchange rate of the dollar;
  - C. Their business repute, qualifications and experience in determining the impact on the value of securities resulting from changes in economic conditions, recessions, inflation, and changes in the exchange rate of the dollar;
  - D. Their business repute, qualifications and experience in determining whether securities and other investments constitute suitable products; and
  - E. Their success in generating profits for clients after they liquidate securities and then purchase precious metals.

## FRAUD AND DECEIT AND THE WAIVERS

60. Respondents GSI Exchange and Anderson are advising and/or are about to advise potential investors to invest in precious metals without regard to their age, occupation, experience or background. As such, Respondents GSI Exchange and Anderson are and/or are about to, in connection with the rendering of investment advice, misrepresent relevant facts because they are also requiring potential investors to represent and warrant they possess the necessary knowledge, experience and financial resources to choose to purchase precious metals from Respondent GSI Exchange without reliance on any statement of information from Respondent GSI Exchange.
61. Respondent GSI Exchange and Anderson are requiring and/or are about to require investors to waive express and implied warranties and to agree to limit their legal recourse. These statements are materially misleading or otherwise likely to deceive the public because Section 33.L of the Securities Act provides that a condition, stipulation, or provision binding a purchaser of services rendered by an investment adviser or investment adviser representative to waive compliance with a provision of the Securities Act or a rule or requirement under the Securities Act, including provisions relating to civil liability of the rendering of unregistered investment advisory services, is void.

**FRAUD AND THE CONCEALMENT  
AND OBSTRUCTION OF THE STATE INVESTIGATION**

62. Respondents GSI Exchange and Anderson are and/or are about to, in connection with the rendering of investment advice, intentionally fail to disclose the following material facts:
- A. The Enforcement Division requested Respondents GSI Exchange and Anderson immediately cease and desist from engaging in any acts or practices that may violation Sections 12 and 12-1 of the Securities Act,
  - B. That Respondents GSI Exchange and Anderson failed to agree to cease and desist from engaging the acts or practices that may violation Sections 12 and 12-1 of the Securities Act and continued to perpetrate the advisory scheme set forth herein.
63. Respondents GSI Exchange and Anderson are and/or are about to, in connection with the rendering of investment advice, intentionally fail to disclose the following material facts:
- A. The Texas Securities Commissioner issued a subpoena that was served on Respondent GSI Exchange;
  - B. The subpoena demanded the production of records and indicated it was issued as part of an investigation to detect and prevent violations of the Securities Act; and
  - C. Respondents GSI Exchange and Anderson continued to perpetrate the advisor scheme set forth herein.
64. Respondents GSI Exchange and Anderson are and/or are about to, in connection with the rendering of investment advice, intentionally fail to disclose the following material facts:
- A. Respondents GSI Exchange and Anderson misrepresented to investors the Enforcement Division was contacting the investors because “of a Gold and Silver supply-chain breakdown that hit many dealers that have not delivered metals to clients in the allotted 30-day period” and that the “Texas State Securities Board is just checking to make sure all clients’ orders are filled;” and
  - B. Respondents GSI Exchange and Anderson knew the Enforcement Division was investigating to detect and prevent violations of the Securities Act.

## THE VIOLATIONS

65. Respondent GSI Exchange is acting as an investment adviser as that term is defined in Section 4.N of the Securities Act.
66. Respondent GSI Exchange is violating Sections 12 and/or 12-1 of the Securities Act by rendering services as an investment adviser in Texas without being registered or notice-filed as an investment adviser.
67. Respondent Anderson is acting as an investment adviser representative as that term is defined in Section 4.P of the Securities Act.
68. Respondent Anderson is violating Section 12 and/or 12-1 of the Securities Act by rendering services as an investment adviser representative in Texas without being registered or notice-filed as an investment adviser representative.
69. Respondents GSI Exchange and Anderson are engaging or are about to engage in fraud in connection with the rendering of investment advice.
70. Respondents have made an offer containing a statement that is materially misleading or otherwise likely to deceive the public.

## THE EMERGENCY CEASE AND DESIST ORDER

71. On July 22, 2021, the Securities Commissioner entered Emergency Cease and Desist Order No. ENF-21-CDO-1844 (the “**Emergency Order**”) against Respondents pursuant to Section 23-2 of the Securities Act.<sup>1</sup> The Emergency Cease and Desist Order found that Respondents have been engaging in conduct, acts and practices that threaten immediate and irreparable harm.<sup>2</sup>
72. The Emergency Order also ordered Respondents as follows:
  - A. It ordered Respondent GSI Exchange to immediately cease and desist from acting as an investment adviser in Texas until it is registered or notice-filed with the Securities Commissioner pursuant to Sections 12 and/or 12-1 of the Securities Act or it is acting pursuant to an exemption under the Securities Act;
  - B. It ordered Respondent Anderson to immediately cease and desist from acting as an investment adviser representative in Texas until he is

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<sup>1</sup> The Alabama Securities Commission also entered a Cease and Desist Order No. CD-2021-0009 against Respondents and others purportedly affiliated with Respondent GSI Exchange.

<sup>2</sup> Pursuant to Section 23-2, Respondents may request a hearing to modify or set aside the Emergency Order before the 31st day after the date of service of the Emergency Order. At this time, Respondents have not requested a hearing to modify or set aside the Emergency Order. Should Respondents file a timely and legal request for a hearing, however, the Enforcement Division will amend this Notice of Hearing to incorporate the case into this cause.

registered or notice-filed with the Securities Commissioner pursuant to Sections 12 and/or 12-1 of the Securities Act or he is acting pursuant to an exemption under the Securities Act;

- C. It ordered Respondents GSI Exchange and Anderson to immediately cease and desist from making an offer containing a statement that is materially misleading or otherwise likely to deceive the public; and
- D. It ordered Respondents GSI Exchange and Anderson to immediately cease and desist from engaging in any fraud in connection with the rendering of investment advice in Texas.

### THE HEARING

- 73. A hearing to determine whether to issue a proposal for decision that orders Respondents to pay refunds to all investors who purchased the services described herein on or after September 1, 2019, and were subject to the illegal and/or fraudulent acts set forth herein, will be held at the State Office of Administrative Hearings. It will commence at **9:00 AM on OCTOBER 19, 2021**.
- 74. The State Office of Administrative Hearings may conduct the hearing via Zoom. Zoom is a video conferencing platform for meetings held through the internet. The State Office of Administrative Hearings will provide instructions for accessing the hearing via Zoom.
- 75. At the hearing, the Enforcement Division will present testimony and other admissible evidence in support of its prayer. Respondents will be afforded the right to present such testimony and evidence relating to issues identified herein.

### REFUND

- 76. As described herein, pursuant to Section 32-1 of the Securities Act, the Enforcement Division is praying for a proposal for decision that includes an order Respondents to pay refunds to all investors who purchased the services described herein on or after September 1, 2019, and were subject to the illegal and/or fraudulent acts set forth herein. The Enforcement Division is praying the order calculate the refund as the amount of each investor's principal investment less the fair market value of assets contained in each investor's account at STRATA.
- 77. Alternatively, the Enforcement Division may agree to waive its prayer solely as it relates to a particular investor if Respondent GSI agrees to refund the entirety of said investor's principal investment in exchange for his or her agreement to return all gold or silver coins to Respondent GSI.

## LEGAL NOTIFICATIONS

78. Legal authority and jurisdiction for this matter exist under 32-1 of the Securities Act, Section 2003.021(b) of the Texas Government Code and Rule 155.51 of the SOAH Rules.
79. **IF YOU DO NOT FILE A WRITTEN ANSWER OR OTHER WRITTEN RESPONSIVE PLEADING TO THIS NOTICE OF HEARING ON OR BEFORE THE 20TH DAY AFTER THE DATE ON WHICH THIS NOTICE WAS MAILED TO YOU OR PERSONALLY SERVED ON YOU, THE FACTUAL ALLEGATIONS IN THIS NOTICE COULD BE DEEMED ADMITTED, AND THE SECURITIES COMMISSIONER MAY DISPOSE OF THIS CASE WITHOUT A HEARING AND MAY GRANT THE RELIEF SOUGHT IN THIS NOTICE. THE RESPONSE MUST BE FILED IN AUSTIN, TEXAS WITH THE SECURITIES COMMISSIONER AND THE STATE OFFICE OF ADMINISTRATIVE HEARINGS, AND ALSO SERVED ON THE STAFF OF THE STATE SECURITIES BOARD. IF YOU FAIL TO ATTEND THE HEARING, EVEN IF A WRITTEN ANSWER OR OTHER RESPONSIVE PLEADING HAS BEEN FILED AND SERVED, THE FACTUAL ALLEGATIONS IN THIS NOTICE COULD BE DEEMED ADMITTED, AND THE SECURITIES COMMISSIONER MAY DISPOSE OF THIS CASE WITHOUT A HEARING AND MAY GRANT THE RELIEF SOUGHT IN THIS NOTICE.**
80. **PARTIES THAT ARE NOT REPRESENTED BY AN ATTORNEY MAY OBTAIN INFORMATION REGARDING CONTESTED CASE HEARINGS ON THE PUBLIC WEBSITE OF THE STATE OFFICE OF ADMINISTRATIVE HEARINGS AT [WWW.SOAH.TEXAS.GOV](http://WWW.SOAH.TEXAS.GOV), OR IN PRINTED FORMAT UPON REQUEST TO THE STATE OFFICE OF ADMINSTRATIVE HEARINGS.**
81. Respondents may access the Securities Act and the Board Rules through the website of the Texas State Securities Board at [www.ssb.texas.gov](http://www.ssb.texas.gov). Respondents may also access the SOAH Rules through the website of the State Office of Administrative Hearings at [www.soah.texas.gov](http://www.soah.texas.gov) and the Administrative Procedure Act through Texas Legislature Online at [statutes.capitol.texas.gov](http://statutes.capitol.texas.gov).
82. The Securities Act authorizes the Texas State Securities Board to pursue administrative, civil or criminal enforcement cases. The Securities Act and Board Rules also authorize the Texas State Securities Board to share information with and refer cases to other governmental agencies with administrative, civil or criminal jurisdiction. These other governmental agencies include, without limitation, state and federal regulatory agencies, law enforcement agencies and prosecutors' offices. Therefore, any information provided, filed or otherwise supplied by Respondents may be shared with these other government agencies and/or used in other cases. Whether the Texas State Securities Board makes its files available to other governmental agencies or refers cases to other government agencies is confidential pursuant to Section 28 of the Texas Securities Act.

83. Pursuant to Board Rule 105.13, the Enforcement Division is now respectfully requesting and will continue to respectfully request the State Office of Administrative Hearings order that all costs charged to the Texas Securities Board by any court reporting service be assessed against Respondents.

#### CONTACT AND FILING INFORMATION

84. The Enforcement Division is represented by Jeramy Heintz, Attorney, Enforcement Division. Mr. Heintz's State Bar Card Number is 24074390, his work address is 208 E. 10th Street, 5th Floor, Austin, Texas 78701, his telephone number is 512-305-8392, his facsimile number is 512-355-0404 and his email address is [jheintz@ssb.texas.gov](mailto:jheintz@ssb.texas.gov).
85. The Docketing Office of the State Office of Administrative Hearings is located at 300 W. 15th Street, Austin, Texas 78701, and it may be contacted by telephone at 512-745-3445 and by facsimile at 512-475-4994.
86. The State Office of Administrative Hearings may conduct the hearing via audio or video conferencing. The audio and video conferencing platforms are secure, free meetings held telephonically or through the internet. The State Office of Administrative Hearings will provide instructions for all hearings held telephonically or through a video conferencing platform.
87. Persons with disabilities who need special accommodations at the hearing, whether held at the State Office of Administrative Hearings or through an audio or video conferencing platform, should contact the Docketing Department of the State Office of Administrative Hearings at 512-475-4993 at least one week prior to the hearing.
88. Pursuant to Board Rule 105.8, all documents filed by any party, other than business records and transcripts, must be contemporaneously served upon Marlene Sparkman, General Counsel and Securities Commissioner's Representative. Ms. Sparkman's address is 208 E. 10th Street, 5th Floor Austin, Texas 78701, her telephone number is 512-305-8300, her facsimile number is 512-305-8336, and her email address is [msparkman@ssb.texas.gov](mailto:msparkman@ssb.texas.gov).

Signed on this, the 22nd day of July, 2021

By: \_\_\_\_\_

Joe Rotunda  
State Bar No. 24029808  
Division Director, Enforcement Division  
Texas State Securities Board  
208 E. 10th Street, 5th Floor  
Austin, Texas 78701  
T: 512-305-8392  
F: 512-355-0404  
E: [jrotunda@ssb.texas.gov](mailto:jrotunda@ssb.texas.gov)

## CERTIFICATE OF SERVICE

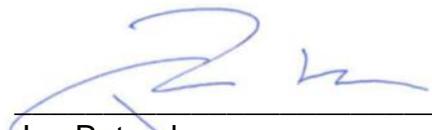
I hereby certify that on this, the 22nd day of July, 2021, true and correct copies of this Notice of Hearing, as well as the exhibits referenced herein, are being served on the following parties through the means set forth below:

**MARLENE SPARKMAN**, General Counsel for the Texas State Securities Board and the Securities Commissioner's Representative, by hand delivery at 208 E. 10th Street, 5th Floor, Austin, Texas 70701, and by electronic mail addressed to [msparkman@ssb.texas.gov](mailto:msparkman@ssb.texas.gov).

**TRUE BULLION LLC DBA GOLD SILVER INTERNATIONAL EXCHANGE DBA GSI EXCHANGE LLC**, by certified mail, return receipt requested, to (1) 4440 PGA Boulevard, #600, Palm Beach Gardens, Florida 33410; (2) 26635 West Agoura Road, #220, Calabasas, California 91302; (3) 3838 Oak Lawn Avenue, Dallas, Texas 75219; (4) its Registered Agent for Service of Process in Delaware, Harvard Business Services, Incorporated, 16192 Coastal Highway, Lewes, Delaware 19958; (5) its Registered Agent for Service of Process in California, Anthony Allen Anderson, 26635 West Agoura Road, #220, Calabasas, California 91302; and (6) its Registered Agent for Service of Process in Florida, Anthony Allen Anderson, 4440 PGA Boulevard, #600, Palm Beach Gardens, Florida 33410.

**ANTHONY ALLEN ANDERSON**, by certified mail, return receipt requested, to (1) 4440 PGA Boulevard, #600, Palm Beach Gardens, Florida 33410; (2) 26635 West Agoura Road, #220, Calabasas, California 91302; and (3) 3838 Oak Lawn Avenue, Dallas, Texas 75219.

By:



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