#### TRAVIS J. ILES SECURITIES COMMISSIONER

# CLINTON EDGAR DEPUTY SECURITIES COMMISSIONER

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## Texas State Securities Board

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

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E. WALLY KINNEY CHAIR

> ROBERT BELT MEMBER

MELISSA TYROCH MEMBER

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IN THE MATTER OF GSBGLOBAL.CO, CARSON WILLIAMS, SHEILA THOMPSON, PATRICK SNIDER, AND KENETH HENDERSON

Order No. ENF-24-CDO-1880

**Gsbglobal.co** is being served by (1) registered mail addressed to Gsbglobal.co at Große Bleichen 35, 20354 Hamburg, Germany, (2) certified mail, return receipt requested, addressed to Gsbglobal.co c/o NameSilo LLC at 1300 E. Missouri Avenue, Phoenix, Arizona 85014, and (3) addressed to Gsbglobal.co c/o PrivacyGuardian.org LLC at 8825 N. 23rd Avenue, Suite 100, Phoenix, Arizona 85021.

**Carson Williams** is being served by registered mail addressed to Gsbglobal.co at Große Bleichen 35, 20354 Hamburg, Germany.

**Sheila Thompson** is being served by registered mail addressed to Gsbglobal.co at Große Bleichen 35, 20354 Hamburg, Germany.

**Patrick Snider** is being served by registered mail addressed to Gsbglobal.co at Große Bleichen 35, 20354 Hamburg, Germany.

**Keneth Henderson** is being served by registered mail addressed to Gsbglobal.co at Große Bleichen 35, 20354 Hamburg, Germany.

## **EMERGENCY CEASE AND DESIST ORDER**

This is your OFFICIAL NOTICE of the issuance by the Securities Commissioner of the State of Texas ("Securities Commissioner") of an EMERGENCY CEASE AND DESIST ORDER pursuant to Section 4007.104 of The Securities Act, Tex. Gov't Code Ann. §§ 4001.001-4008.105 (the "Securities Act").

The Enforcement Division of the Texas State Securities Board (the "Enforcement Division") has presented evidence sufficient for the Securities Commissioner to find that:

### SUMMARY

1. The Securities Commissioner is entering this Emergency Cease and Desist Order to stop a fraudulent investment scheme spoofing GSB Gold Standard Corporation AG and misleading the public through the use of photographs and images attributable to other entities.

### THE RESPONDENTS

- 2. Gsbglobal.co ("Respondent GSBGlobal") is being served by registered mail addressed to Große Bleichen 35, 20354 Hamburg, Germany.
- 3. Carson Williams ("Respondent Williams") purports to be the Chairman of the Board of Respondent GSBGlobal. He is being served by registered mail addressed to Große Bleichen 35, 20354 Hamburg, Germany.
- 4. Sheila Thompson ("Respondent Thompson") purports to be the Vice-Chairman of the Board of Respondent GSBGlobal. She is being served by registered mail addressed to Große Bleichen 35, 20354 Hamburg, Germany.
- 5. Patrick Snider ("Respondent Snider") purports to be a Corporate Director of Respondent GSBGlobal. He is being served by registered mail addressed to Große Bleichen 35, 20354 Hamburg, Germany.
- 6. Keneth Henderson ("Respondent Henderson") purports to be a Mining Consultant for Respondent GSBGlobal. He is being served by registered mail addressed to Große Bleichen 35, 20354 Hamburg, Germany.
- 7. The Enforcement Division is also sending this Emergency Cease and Desist Order to the following parties through the following means:
  - A. NameSilo, LLC, the registrar of the website accessible at gsbglobal.co (the "GSBGlobal Website"), via email addressed to abuse@namesilo.com, through a form accessible for its website at namesilo.com, and by certified mail, return receipt requested, addressed to 1300 E. Missouri Avenue, Phoenix, Arizona 85014.
  - B. PrivacyGuardian.org LLC, the registrant contact for GSBGlobal Website, via certified mail, return receipt requested, addressed to 8825 N. 23rd Avenue, Suite 100, Phoenix, Arizona 85021.

# THE PUBLIC SOLICITATION OF INVESTMENTS TIED TO MINING PHYSICAL GOLD AND DIGITAL ASSETS

- 8. Respondents GSBGlobal, Williams, Thompson, Snider and Henderson (collectively the "Respondents") are soliciting investors through GSBGlobal Website.
- 9. Respondent GSBGlobal is the issuer of the investments, and they are described in greater detail as follows:
  - A. Investors purchasing the Basic Investment Plan must transfer digital assets valued at \$200 or more, and they thereafter purportedly earn 1% per day over a term of seven days; and

- B. Investors purchasing the Premium Investment Plan must transfer digital assets valued at \$10,000 or more, and they thereafter purportedly earn 3% per day over a term of seven days.
- 10. Investors must transfer digital assets, and not fiat currency, to purchase the Basic and Premium Investments Plans. The assets accepted by Respondents, and the wallet addresses used by Respondent GSBGlobal, include the following:
  - A. Investors may pay using Ether (ETH) or Tether (USDT) sent to 0x59796cff96fabe32d2c95c187fc9e6059c330e4d,
  - B. Investors may pay using Bitcoin (BTC) sent to 14J4TDLQPfieMcYFp9jzbG4Nw1y4WPh7HJ, and
  - C. Investors may pay using Bitcoin Cash (BCH) sent to qqsl25w6y3zhf2y5099ap9vurdekc7a3tusna67wk5.

### **THE REFERRAL PROGRAM**

11. Investors registering accounts through the GSBGlobal Website are assigned a referral link. They are purportedly able to use the link to advertise on behalf of Respondents and earn commissions for each referred client that purchases the Basic or Premium Investment Plan.

### THE SPOOFING OF GSB GOLD STANDARD CORPORATION AG

- 12. Respondents are using the GSBGlobal Website, a website accessible at gsbglobal.co, to spoof GSB Gold Standard Corporation AG ("GSB Gold Standard"), a company that maintains a website at gsb.gold (the "GSB Gold Standard Website").
- 13. In furtherance of the scheme, Respondents are falsely representing the website is maintained by GSB Gold Standard, using the logo of GSB Gold Standard, using the name of a principal of GSB Gold Standard, Josip Heit, and providing other information drawn from the GSB Gold Standard Website and other content previously published by GSB Gold Standard.
- 14. In truth and in fact, on or about January 16, 2024, Josip Heit, on behalf of GSB Gold Standard, filed a complaint with the World Intellectual Property Organization Arbitration and Mediation Center relating to the GSBGlobal Website. The complaint alleged violations of the following Paragraphs of the Uniform Domain Name Dispute Resolution Policy (the "Policy") and was filed pursuant to the following Paragraphs of the Rules for Uniform Domain Name Dispute Resolution Policy (the "Rules"):
  - A. Policy, Paragraph 4(a)(i), and Rules, Paragraphs 3(b)(viii), (b)(ix)(1): the domain name is identical or confusingly similar to a trademark or service mark in which the GSB Gold Standard has rights,

- B. Policy, Paragraph 4(a)(ii), and Rules, Paragraph 3(b)(ix)(2): the Respondent has no rights or legitimate interests in respect of the domain name(s), and
- C. Policy, Paragraphs 4(a)(iii), 4(b), Rules, Paragraph 3(b)(ix)(3): the domain name(s) was/were registered and is/are being used in bad faith.

# THE SPOOFING OF A NATURAL RESOURCES COMPANY AND AN ORGANIZATION THAT PROVIDES IDENTITY MANAGEMENT SERVICES

- 15. The GSBGlobal Website presents portraits that purportedly depict Respondents Williams, Thompson, Snider and Henderson and describes their purported role with Respondent GSBGlobal. Despite its representations, the portraits are actually images of officers of a diversified natural resources company with shares listed on the Toronto Stock Exchange and New York Stock Exchange.
- 16. The GSBGlobal Website also presents photographs of other persons and creates the appearance these persons are affiliated with Respondent GSBGlobal. Despite this appearance, the photographs are actually images of persons associated with an international organization that provides identity management services.

### STOCK IMAGES DEPICTING MINING OPERATIONS AND GOLD

- 17. The GSBGlobal Website also presents images that purportedly show gold bars and mining operations and creates the appearance persons and events depicted in the images are associated with Respondent GSBGlobal. Despite this appearance, the photographs are actually stock photographs.
- 18. Notwithstanding the foregoing, Respondents are providing copyright information for photographs that appear in GSBGlobal. This copyright information falsely claims the content was obtained from Adobe and does not, in any way, identify GSB Gold Standard, the aforementioned diversified natural resources company or the aforementioned identity management organization.

### **REGISTRATION VIOLATIONS**

- 19. Respondents have not been registered with the Securities Commissioner as dealers or agents at any time material hereto.
- 20. The Basic and Premium Investment Plans have not been registered by qualification, notification, or coordination and no permit has been granted for their sale in Texas at any time material hereto.

### FRAUD, DECEPTION, AND THE SPOOFING SCHEME

21. In connection with the offer and sale of the Basic and Premium Investment Plans, Respondents are intentionally failing to disclose the following material facts:

- A. The aforementioned portraits of Respondents Williams, Thompson, Snider, and Henderson are actually images of officers or employees of a diversified natural resources company, and
- B. The aforementioned photographs of other persons are actually photographs of officers or employees of an international organization that provides identity management services.
- 22. In connection with the offer and sale of the Basic and Premium Investment Plans, Respondents are misrepresenting they are GSB Gold Standard, a relevant fact, and intentionally failing to disclose they have no relationship or affiliation with GSB Gold Standard, a material fact.
- 23. Respondents are describing GSB Gold Standard and using its logo in the GSBGlobal Website. Their statements are materially misleading or otherwise likely to deceive the public because they are not disclosing Josip Heit, on behalf of GSB Gold Standard, filed a complaint with the World Intellectual Property Organization Arbitration and Mediation Center relating to the GSBGlobal Website.

## FRAUD AND THE CONCEALMENT OF OPERATIONAL INFORMATION

- 24. In connection with the offer and sale of the Basic and Premium Investment Plans, Respondents are intentionally failing to disclose the following material facts relating to its principals and operations:
  - A. The true identity of its owners and principals, as well as their business repute, experience and qualifications,
  - B. The location and physical address of its office or offices,
  - C. Its assets, liabilities, revenue and other financial information relating to its capitalization, and
  - D. Information showing its success, if any, in generating profits and paying returns to purchasers of the Basic and Premium Investment Plans.

### **DECEPTION AND THE REFERRAL PROGRAM**

- 25. As described herein, Respondents are providing all clients with a referral link that purportedly affords them the opportunity to earn commissions for referring new clients to Respondent GSBGlobal. Its statements relating to the referral program are materially misleading or otherwise likely to deceive the public because:
  - A. Parties offering the Basic or Premium Investment Plans in or from Texas are offering unregistered securities in violation of Section 4003.001 of the Securities Act, and

B. Parties offering the Basic or Premium Investment Plans in or from Texas are offering securities in violation of Section 4004.051 of the Securities Act unless the parties registered as dealers or agents.

### **CONCLUSIONS OF LAW**

- 1. The Basic and Premium Investment Plans are as securities as that term is defined in Section 4001.068 of the Securities Act.
- 2. Respondents are violating Section 4003.001 of the Securities Act by offering securities for sale in Texas at a time when the securities are not registered with or permitted by the Securities Commissioner.
- 3. Respondents are violating Section 4004.051 of the Securities Act by offering securities for sale in Texas without being registered pursuant to the provisions of Section 4004.051 of the Securities Act.
- 4. Respondents are engaging in fraud in connection with the offer for the sale of securities.
- 5. Respondents are making offers containing statements that are materially misleading or otherwise likely to deceive the public.
- 6. Respondents' conduct, acts, and practices threaten immediate and irreparable harm.
- 7. The foregoing violations constitute bases for the issuance of an Emergency Cease and Desist Order pursuant to Section 4007.104 of the Securities Act.

### **ORDER**

- 1. It is therefore ORDERED that Respondents immediately CEASE AND DESIST from offering for sale any security in Texas until the securities are registered with the Securities Commissioner or is offered for sale pursuant to an exemption from registration under the Texas Securities Act.
- It is further ORDERED that Respondents immediately CEASE AND DESIST from acting as securities dealers, agents, investment advisers, or investment adviser representatives in Texas until they are registered with the Securities Commissioner or are acting pursuant to an exemption from registration under the Texas Securities Act.
- 3. It is further ORDERED that Respondents immediately CEASE AND DESIST from engaging in any fraud in connection with the offer for sale of any security in Texas.
- 4. It is further ORDERED that Respondents immediately CEASE AND DESIST from offering securities in Texas through an offer containing a statement that is materially misleading or otherwise likely to deceive the public.

### NOTICE

Pursuant to Section 4007.104 of the Securities Act, you may request a hearing before the 31st day after the date you were served with this Order. The request for a hearing must be in writing, directed to the Securities Commissioner, and state the grounds for the request to set aside or modify the Order. Failure to request a hearing will result in the Order becoming final and non-appealable.

You are advised under Section 4007.206 of the Securities Act that any knowing violation of an order issued by the Securities Commissioner under the authority of Section 4007.104 of the Securities Act is a criminal offense punishable by a fine of not more than \$10,000.00, or imprisonment in the penitentiary for two to ten years, or by both such fine and imprisonment.

SIGNED AND ENTERED by the Securities Commissioner this 29<sup>th</sup> day of February 2024.

TRAVIS J. ILES

Securities Commissioner