BEFORE THE
STATE OF WISCONSIN
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF SECURITIES

In the Matter of,	CONSENT ORDER TO CEASE & DESIST
JOHN L. ADKINS,	
Respondent.	DFI Case No. S-243677 (EX)

I.

The Administrator of the State of Wisconsin, Department of Financial Institutions, Division of Securities ("Division"), having legal authority and jurisdiction to administer and enforce the Wisconsin Uniform Securities Law, Wis. Stats. Ch. 551 ("Ch. 551") and rules and orders promulgated thereunder, and having determined that this action is necessary and appropriate in the public interest and for the protection of investors, hereby enters this Order as follows:

II.

Division staff have presented evidence sufficient for the Administrator to make the following findings of fact and conclusions of law:

A. Findings of Fact

Respondents

1. John L. Adkins ("Adkins") is an adult male resident of New Jersey with a last known address of 667 Chambers Street, Trenton, New Jersey 08611-3701.

Conduct

2. Adkins has never been registered with the Division, Financial Regulatory Authority ("FINRA"), the Securities and Exchange Commission ("SEC"), or the Commodity Futures Trading Commission ("CFTC").

3. EndoTech is an Israel-based company formed in or about 2012. EndoTech's chief executive officer is Anna Becker, and its chief operating officer is Dmitry Gooshchin. EndoTech has a last known business address of Tuwal 30, Ramat Gan, Israel 52522-42. EndoTech appears to be involved in the financial technology industry.

4. EndoTech purports to have created the Decentralized Artificial Intelligence System (also referred to as "DAISY" in its promotional literature) to purportedly trade in cryptocurrencies and fund EndoTech as a Company.

5. In or about March 2021, Adkins posted an advertisement on Craigslist for the Madison, Wisconsin posting area soliciting investors for EndoTech and for investing in artificial intelligence, cryptocurrency, and blockchain.

6. At least one Wisconsin resident responded to the advertisement and was contacted by Adkins several times via telephone and electronic mail to discuss investing in EndoTech during March 2021.

7. Adkins told the Wisconsin resident that Adkins could "sponsor" him to open an account to invest in EndoTech by opening an account to purchase "Tron" cryptocurrency, which could then be transferred to EndoTech using its "DAISY" technology. In exchange for the cryptocurrency, the Wisconsin resident would receive EndoTech stock.

8. Adkins represented to the Wisconsin resident that investors in EndoTech would receive a return on their investment when EndoTech made a profit.

9. Adkins further represented to the Wisconsin resident that EndoTech's stock would go public sometime in 2022, at which time the value would likely appreciate 1,500 percent.

10. Adkins told the Wisconsin resident that if the Wisconsin resident invested, Adkins would receive a commission for his efforts. Adkins further represented to the Wisconsin resident that the Wisconsin resident could earn his own commissions by recruiting other investors to put money into EndoTech.

11. Adkins instructed the Wisconsin resident to open an account to invest in EndoTech by using a virtual private network ("VPN") to avoid detection that the Wisconsin resident is an American citizen. Adkins acknowledged that US citizens could not legally invest in EndoTech.

12. At no time did Adkins make any inquiry regarding the Wisconsin resident's net worth or annual income.

13. The Wisconsin resident was over the age of 65 at the time Adkins contacted him to invest.

B. Conclusions of Law

Legal Authority and Jurisdiction

14. The Administrator has legal authority and jurisdiction over the conduct described above, pursuant to Wis. Stats. Ch. 551 and the rules and orders promulgated thereunder.

15. The EndoTech stock offered by Adkins is a security pursuant to Wis. Stats. § 551.102(28).

16. The EndoTech stock offered by Adkins is also a security pursuant to Wis. Stat. § 551.102(28)(d)(1).

17. Adkins transacted business in Wisconsin as an agent pursuant to Wis. Stat. § 551.102(2) and § DFI-Sec. 1.02(5), Wis. Admin. Code.

18. Pursuant to Wis. Stat. §551.301, it is unlawful for a person to offer or sell a security in this state unless the security is a federal covered security, the security, transaction, or offer is exempted from registration under Ch. 551, or the security is registered under Ch. 551.

19. Pursuant to Wis. Stat. § 551.402(1), it is unlawful for an individual to transact business in Wisconsin as an agent unless the individual is registered under Ch. 551 as an agent or is exempt from registration as an agent under Wis. Stat. § 551.401(2).

20. Pursuant to Wis. Stat. § 551.501(3) it is unlawful for a person, in connection with the offer, sale, or purchase of a security, directly or indirectly, to engage in an act, practice, or course of business that operates or would operate as a fraud or deceit upon another person.

Violations

21. Through the conduct described above in ¶¶ 1-13, Adkins violated Wis. Stat. § 551.301(1) when he offered securities which were not federally covered, registered, or exempted from registration in Wisconsin.

22. Through the conduct described above in ¶¶ 1-13, Adkins violated Wis. Stat. § 551.402(1) when he transacted business as an agent in Wisconsin without being registered under Ch. 551 or exempted from registration under § Wis. Stat. § 551.401(2).

23. Through the conduct described above in ¶¶ 1-13, Adkins violated Wis. Stat. § 551.501(3) when he engaged in an act, practice, or course of business that operates or would operate as a fraud or deceit upon another person by directing the Wisconsin resident to utilize a VPN to illegally invest in EndoTech.

III.

In view of the above findings of fact and conclusions of law, the Administrator deems it necessary and appropriate in the public interest and for the protection of investors, and pursuant to its legal authority and jurisdiction under Ch. 551, to wit Wis. Stat. § 551.604, to issue the following orders and notices:

A. Consent Orders issued pursuant to Wis. Stat. § 551.604(2)

(a) IT IS ORDERED that ADKINS, his agents, servants, officers, employees, successors, affiliates, and every entity and person directly or indirectly controlled or organized by or on behalf of ADKINS, shall cease and desist from making or causing to be made to any person or entity in Wisconsin any further offers or sales of securities unless and until such securities qualify as federal covered securities, federal exempt securities or are registered under Ch. 551 or successor statute, pursuant to Wis. Stat. §§ 551.604(1)(a) and (2).

(b) IT IS FURTHER ORDERED that all exemptions from registration set forth at Ch. 551 or successor statute that might otherwise apply to any offer or sale of any security of or by ADKINS, his agents, servants, officers, employees, successors, affiliates, and every entity and person directly or indirectly controlled or organized by or on behalf of ADKINS, are hereby revoked, pursuant to Wis. Stats. §§ 551.604(1)(b) and (2).

(c) IT IS FURTHER ORDERED that all exemptions from registration set forth in Wis. Stat. §§ 551.201 and 551.202 that may otherwise apply to a specific security, transaction or offer of or by ADKINS, his agents, servants, officers, employees, successors, affiliates, and every entity and person directly or indirectly controlled or organized by or on behalf of ADKINS, are hereby revoked, pursuant to Wis. Stats. §§ 551.604(1)(c) and (2).

(d) IT IS FURTHER ORDERED that ADKINS, his successors, affiliates, controlling persons, officers, agents, servants, employees and every entity and person directly or indirectly controlled or hereafter organized by or on behalf of ADKINS, are prohibited from violating Wis. Stat. § 551.501 or successor statute.

(e) IT IS FURTHER ORDERED that ADKINS, his successors, affiliates, controlling persons, officers, agents, servants, employees, and every entity and person directly or indirectly controlled or hereafter organized by or on behalf of ADKINS, are prohibited from violating Ch. 551 or successor statute that might otherwise apply to any offer or sale of a security of or by ADKINS.

(f) PLEASE TAKE NOTICE that the orders of the Administrator are effective as of the issuance of this order, pursuant to Wis. Stat. § 551.604(2).

B. Service of Order

(g) IT IS FURTHER ORDERED that this order shall be sent promptly by certified mail to each party named in the order at his or her last known address or to the party's attorney of record, or shall be personally served upon the party or the party's attorney of record, pursuant to Wis. Admin. Code§ DFI-Sec. 8.06. This order shall also be served upon the office of the administrator pursuant to Wis. Stat. § 551.611.

(h) PLEASE TAKE NOTICE that if service is by certified mail, the date of the service of this order is the date it is placed in the mail. If service is by personal service, the date of the service of this order is the date personal service is completed.

C. Notifications

(i) PLEASE TAKE NOTICE that this Order consented to by ADKINS prohibits ADKINS from transacting business in the State of Wisconsin per the terms of the consent orders issued pursuant to Wis. Stat. § 551.604(2), is effective upon the date issued, and shall have the same effect on ADKINS as a permanent injunction entered by a circuit court pursuant to Wis. Stat. § 551.603(2)(a).

(j) PLEASE TAKE FURTHER NOTICE that this Order is effective on the date it is issued. ADKINS is advised that any willful violation of an Order issued by the Division under Ch. 551 is a criminal offense punishable under the provisions of Wis. Stat. § 551.508.

(k) PLEASE TAKE FURTHER NOTICE failure to provide a copy of this order to prospective investors may be a material misrepresentation in violation of Ch. 551 and this order.

(l) PLEASE TAKE FURTHER NOTICE violations of this order may be enforced by any investor, or by the Division pursuant to Wis. Stat. § 551.604(7) whether acting in its own right or on behalf of the investor, by petitioning any court of competent jurisdiction to enforce the terms of the order.

EXECUTED at Madison, Wisconsin, and effective on this 26th day of May, 2021.



Leslie M. Van Buskirk
Administrator

Division of Securities
State of Wisconsin
Department of Financial Institutions
4822 Madison Yards Way
North Tower, 4th Floor
Madison, Wisconsin 53705

BEFORE THE
STATE OF WISCONSIN
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF SECURITIES

In the Matter of	WAIVER AND CONSENT TO ORDER
JOHN L. ADKINS,	
Respondent.	DFI Case No. S-243677 (EX)

The undersigned Respondent, JOHN L. ADKINS, having decided not to contest the issuance of the attached Order, hereby waives his right to a hearing with respect to this matter, including waiving findings of fact and conclusions of law as may otherwise be required for the Order, and hereby consents to the issuance of the Order.

Respondent hereby acknowledges that, in exchange for Respondent's voluntary consent and agreement to cease and desist from further violations of Ch. 551, the revocation of certain exemptions, and other conditions as described in the attached Order, the Division agrees to forgo further legal action, including injunction proceedings in a circuit court pursuant to Wis. Stat. § 551.603, and to resolve this matter by issuance of the attached Order.

The undersigned Respondent understands and agrees that the attached Order shall prohibit Respondent from transacting any securities business in the State of Wisconsin, effective on the date the Order is issued. The undersigned Respondent understands the Order, when signed by the Administrator of the Division of Securities, is effective on the date issued and that a willful violation of an Order signed by the Administrator is a criminal offense pursuant to Wis. Stat. § 551.508.

John L Adkins

JOHN L. ADKINS

State of New Jersey)
County of Middlesex)
Subscribed before me this
18 of May, 2021.

Notary Public
My commission is permanent/expires _____

Joee Taveras
ID # 50092177
Notary Public
State Of New Jersey
My Commission Expires October 15, 2023

State of Wisconsin

Department of Financial Institutions

Tony Evers, **Governor** Kathy Blumenfeld, **Secretary**

AFFIDAVIT OF SERVICE
AND COMPLIANCE WITH WIS. STAT. § 551.611

STATE OF WISCONSIN)
) ss.
COUNTY OF DANE)

I, KATHERINE CLEMENTI, first being duly sworn, depose and state:

1. I am employed with the State of Wisconsin, Department of Financial Institutions, Division of Securities.

2. On the date of this Affidavit and in the course of regularly conducted activity, I have caused to be served by certified mail upon John L. Adkins at his last known address of 667 Chambers Street, Trenton, New Jersey 08611-3701:

   i. A copy of the Consent Order to Cease & Desist, Waiver and Consent to Order; DFI Case No. S-243677 (EX); and

   ii. A copy of this Affidavit of Service.

3. In compliance with Wis. Stat. §§ 227.48, 551.611, and 891.46; and Wis. Admin. Code. §§ DFI-Sec 8.06 and 8.07, I have also caused to be served copies of those same documents upon the Administrator for the Division of Securities.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Katherine Clementi

KATHERINE CLEMENTI

State of Wisconsin
Department of Financial Institutions
Division of Securities

Subscribed and sworn to before me

This 26 day of May, 2021.

Bonnie J Kusek

Notary Public, State of Wisconsin
My commission expires 2/12/2024.

(Notary Seal)

BONNIE J. KUSEK NOTARY PUBLIC STATE OF WISCONSIN

Division of Securities
Mail: PO Box 1768 Madison, WI 53701-1768
Courier: 4822 Madison Yards Way, Madison, WI 53705
Voice: (608) 261-9555 Fax: (608) 264-7979 Web: www.wdfi.org