

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

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In the Matter of,

GLOBAL-ASSETS, INC.; and  
NATASHA BERKOWITZ

Respondents.

SUMMARY ORDER TO CEASE AND  
DESIST AND REVOKING EXEMPTIONS  
NOTICE OF PROPOSED ORDER FOR  
RESTITUTION AND CIVIL PENALTIES

DFI Case No. S-251708 (EX)

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**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**

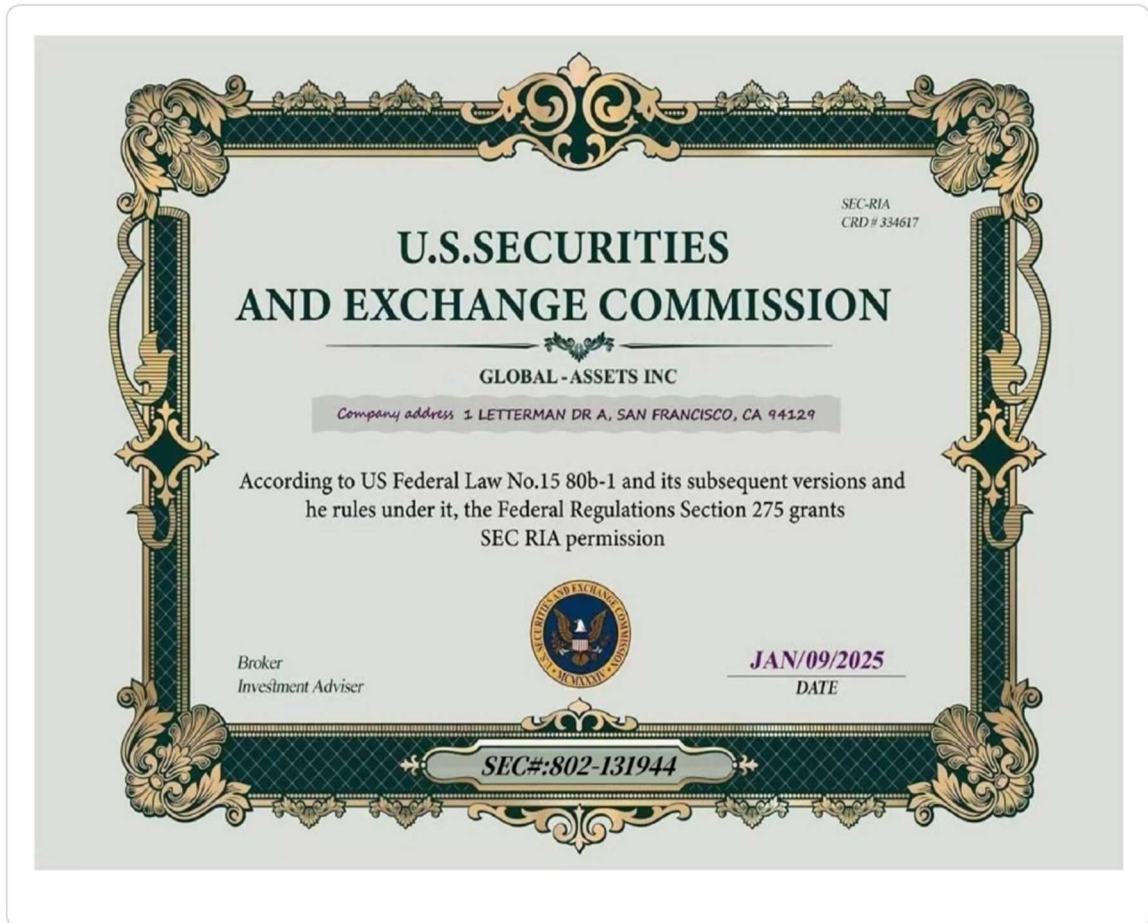
**Respondents**

1. At all relevant times, Global-Assets, Inc. (“Global-Assets”) (CRD #334617) purported to be a digital platform for conducting digital asset transactions and related services provided on its now defunct website [global-assets.com](http://global-assets.com). Its reported address is 1 Letterman Drive, Building A, San Francisco, CA 94129. Global-Assets was organized under the laws of Colorado effective January 18, 2021. Global-Assets’ registered agent is Constantin Nicolae Ivan located at 1312 17<sup>th</sup> Street, Unit Num 2955, Denver, CO 80202.
2. Domain registration information for Global-Assets lists an address of 3447 Willis Avenue, Jacksonville, Florida, 32202, which appears to be fictitious, and an email address of [alassets898@outlook.com](mailto:alassets898@outlook.com). The user who registered the website has a Hong Kong IP address linked to the internet service provider China Unicom.
3. Natasha Berkowitz (“Berkowitz”) is likely an alias for one or more control persons of Global-Assets with no known address, but was purportedly located in New York City with an email address of [natashaberkowitz7@gmail.com](mailto:natashaberkowitz7@gmail.com).

## Conduct

4. In or about December 2024 or January 2025, Wisconsin resident [REDACTED] (“Investor KS”) began communicating with Berkowitz on LinkedIn when he received her friend request. After the friend request was accepted, Berkowitz sent Investor KS direct messages on LinkedIn asking for his thoughts on gold and digital gold. Berkowitz represented to Investor KS that she lived in New York City near Central Park, that she had attended college in the area, and that she currently worked for a financial firm run by hedge fund manager Steve Cohen. Berkowitz further represented that her father had been Cohen’s college roommate, which was her entry to employment with the financial firm, and that she worked directly with Cohen.
5. Berkowitz and Investor KS continued their conversation on LinkedIn until about June 2025, when they moved their conversation to WhatsApp at the direction of Berkowitz.
6. Berkowitz began showing Investor KS numerous screenshots of purportedly large profits she was making on the website global-assets.com. Berkowitz described her activity as “volatility trades” in which she would generate returns of 100% profit within a few minutes. In one volatility trade, Berkowitz purportedly invested \$800,000 and, within a few minutes, was rewarded with a return of \$1.6 million.
7. As described by Berkowitz, the volatility trades were derivatives or options contracts based on the price of the underlying cryptocurrency asset. Berkowitz told Investor KS that if he invested, she would direct him when to buy or sell his derivative or option investments based on Steve Cohen’s analysis of the digital gold market using AI.
8. In addition to volatility trades, Berkowitz described another investment on the global-assets.com platform called “AI Arbitrage.” In an AI Arbitrage trade, the investor would select a lock-up time denominated by a number of days. The longer the lock-up period, the greater percentage return the investor would earn. Berkowitz described AI Arbitrage trading as “AI robots” and told Investor KS she would direct him as to which AI Arbitrage lock-up periods to select on the website.
9. The Global-Assets website viewed by Investor KS contained numerous representations. Among other things, it urged investors to “Invest in your future. Grow your portfolio in a fair and open financial system.” The website further claimed a 24-hour trading volume of “\$3.8 B,” and “350+ Listing digital assets” and “1.2 M Registered Users.”
10. The Global-Assets website also contained a regulatory licensing section in which it purported to be a broker and investment adviser registered with the SEC as follows:

## Regulatory license



11. In addition, Global-Assets filed a Form ADV with the SEC in which it reported to “qualify for exemption, acting solely as an adviser to private funds and have assets under management, as defined in rule 203(m)-1, in the United States of less than \$150 million.” The Form ADV stated that Global-Assets has an SEC File number of 802-131944, business hours of Monday through Friday “10:00-17:00”, and a telephone number of “001(909)3484763”. There is no CCO or Regulatory Compliance persons listed on the Form ADV, which was signed by CEO Christian James Oram on 1/9/2025.
12. The website had a page identifying its management team, including its Chief Executive Officer, Chief Technology Officer, Chief Financial Officer, Legal Adviser, Chief Operating Officer, Chief Investment Officer, Chief Credit Officer, and Director of Data and Artificial Intelligence. The website also stated: “We provide traders with lower transaction costs, better order execution and safer financial services. Joining a world-class trading broker allows you to easily participate in the global financial market.”
13. Based on Berkowitz’s representations and representations on global-assets.com, Investor KS initially invested about \$5,000 with the global-assets.com platform. Berkowitz showed Investor KS step by step how to make “volatility trades” on the platform, and the platform made it appear that Investor KS was making a large profit. For example, at one point,

Investor KS believed he was earning 2% return per day by conducting 15-day lock-up AI Arbitrage trades under Berkowitz's instructions. This led Investor KS to continue to invest.

14. In total, Investor KS made at least 12 cryptocurrency transactions in his dealings with the global-assets.com platform. These twelve cryptocurrency transactions totaled approximately \$526,188.34.
15. In July 2025, Investor KS attempted his first withdrawal from the global-assets.com platform. Investor KS deposited .264358 ETH (approximately \$790 USD at the time) as a fee to withdraw \$5,000 from the platform. The Global-Assets website customer service told Investor KS that this amount was either insufficient or was incorrectly deposited and that his \$5,000 withdrawal would not take place.
16. Shortly thereafter, on or about July 23, 2025, Investor KS received a message from global-assets.com customer service stating that Investor KS was being accused of insider trading and money laundering. Investor KS believed the accusations were based on the enormous profits he was making.
17. Eventually, global-assets.com customer service informed Investor KS he would need to close his account entirely due to the accusations. In order to close his account and receive his profits, he was instructed to make additional deposits, including fund verification fees, gas fees, and an escrow deposit. Investor KS paid all of the fees that he could, even borrowing \$50,000 from a friend to help cover them. He never received back any of his principal or profit.
18. Contrary to the representations of Global-Assets and Berkowitz, Investor KS' funds were never invested in a cryptocurrency trading platform. Instead, approximately 125,984.464321 USDC was sent to wallet addresses unknown to Investor KS. As of the date of this Order, those funds have been blocklisted by Circle. Investor KS' remaining funds were converted to USDT and Dai, routed through additional addresses and eventually sent to an exchange called Gate.io. The Gate.io account is attributed to Phuong Thao Tran of Vietnam, DOB 5/12/2000. Upon information and belief, most or all of Investor KS' funds in the Gate.io account were converted from USDT into VND (Vietnamese Dong).
19. The investment programs, namely the volatility trading program and the AI Arbitrage program, promoted by Berkowitz and Global-Assets, required the investment of money in the investment programs managed by Global-Assets from which the investor expected profits to be derived from the efforts of Global-Assets.
20. Global-Assets and Berkowitz, for compensation, engaged in the business of advising Investor KS as to the value of securities and the advisability of investing in and purchasing securities in this state.
21. Investor KS was a passive investor, providing investment funds to Global-Assets but having no control or access to the account held by Global-Assets. The investment was entirely managed by Global-Assets.

22. Respondents designed the securities investment programs to accept offers to purchase from investors in Wisconsin and allow Wisconsin investors to enroll in its passive income investment program.
23. In connection with the offers of securities, Berkowitz and Global-Assets failed to disclose the firm's financial statements, including its assets, liabilities, and profitability; the risks of investing in cryptocurrency transactions on the global-assets.com platform; and additional fees charged for withdrawal of funds from the platform. In addition, Respondents affirmatively misrepresented the platform's registration status with the SEC by posting a false certification on global-assets.com.
24. At no time were Respondents registered with the Division in any capacity.

## **B. Conclusions of Law**

### **Legal Authority and Jurisdiction**

25. The Administrator has legal authority and jurisdiction over the conduct described above, pursuant to Wis. Stat. Ch. 551 and the rules and orders promulgated thereunder.
26. Notes and other evidence of indebtedness constitute securities under Wis. Stat. § 551.102(28).
27. The purported investments programs offered and sold by Respondents to Investor KS, whereby Respondents received funds from KS to be held on account for his benefit and used to engage in profit seeking investment and speculation on the fluctuations in the value of cryptocurrencies operated entirely by third parties — as picked by Respondents — and to be later withdrawn, constituted a note or other evidence of indebtedness as provided in Wis. Stat. § 551.102(28).
28. An investment contract constitutes a security under Wis. Stat. § 551.102(28)(d)(1).
29. The transactions between Respondents and Investor KS were an investment contract, including as defined by Wis. Stat. § 551.102(28)(d)(1), because Investor KS invested in a common enterprise with the expectation of profits to be derived through the essential managerial efforts of someone other than Investor KS, namely Respondents.
30. The transactions between Respondents and Investor KS also constituted an investment contract, pursuant to Wis. Stat. § 551.102(28)(d)(2), because Respondents induced Investor KS to furnish funds to Respondents based on representations from Respondents by which Investor KS reasonably understood that a valuable benefit of some kind over and above the initial funds would accrue to Investor KS as a result of the operation of the enterprise, and with Investor KS not having the right to exercise practical and actual control over the managerial decisions of the enterprise.

31. The investment contracts sold by Respondents to Investor KS were required to be, but were not, registered with the Division.
32. Pursuant to Wis. Stat. § 551.301(1), it is unlawful to offer or sell securities in Wisconsin unless the securities are registered under Ch. 551, federally covered securities, or exempted from registration under Ch. 551.
33. A broker-dealer is a person engaged in the business of effecting transactions in securities for the account of others or for the person's own account under Wis. Stat. § 551.102(4).
34. Pursuant to Wis. Stat. § 551.401(1), it is unlawful for a person to transact business in this state as a broker-dealer unless the person is registered under Ch. 551 as a broker-dealer or is exempt from registration as a broker dealer pursuant to Wis. Stat. § 551.401(2).
35. Respondents transacted business as a broker-dealer as defined under Wis. Stat. § 551.102(4) and Wis. Admin. Code § DFI-Sec. 1.02(5).
36. Pursuant to Wis. Stat. § 551.102(15), an investment adviser is defined as a person that, for compensation, engages in the business of advising others, either directly or through publications, writings, or electronic means, as to the value of securities or the advisability of investing in, purchasing, or selling securities or that, for compensation and as a part of a regular business, issues or promulgates analyses or reports concerning securities. The term includes a financial planner or other person that, as an integral component of other financially related services, provides investment advice regarding securities to others for compensation as part of a business or that holds itself out as providing investment advice regarding securities to others for compensation.
37. Pursuant to Wis. Stat. § 551.403(1), it is unlawful for a person to transact business in Wisconsin as an investment adviser unless the person is registered under Ch. 551 as an investment adviser or is exempt from registration as an investment adviser under Wis. Stat. § 551.403(2).
38. Respondents transacted business as an investment adviser as defined under Wis. Stat. § 551.102(15).
39. Pursuant to Wis. Stat. § 551.501(1), it is unlawful for a person, in connection with the offer, sale, or purchase of a security, directly or indirectly, to employ a device, scheme, or artifice to defraud.
40. Pursuant to Wis. Stat. § 551.501(2), it is unlawful for a person, in connection with the offer, sale or purchase of a security, directly or indirectly, to make any untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

41. 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.
42. Pursuant to Wis. Stat. § 551.502(1), it is unlawful for a person that advises others for compensation, either directly or indirectly or through publications or writings, as to the value of securities or the advisability of investing in, purchasing, or selling securities or that, for compensation and as part of a regular business, issues or promulgates analyses or reports relating to securities, to employ a device, scheme, or artifice to defraud another person or to engage in an act, practice, or course of business that operates or would operate as a fraud or deceit upon another person.

### **Violations**

Through the conduct described above, Respondents engaged in the following violations:

43. Respondents violated Wis. Stat. § 551.401(1) by transacting business as a broker-dealer in Wisconsin without being registered under Ch. 551 or exempted from registration under Wis. Stat. § 551.401(2).
44. Respondents violated Wis. Stat. § 551.301 by offering and selling unregistered securities in this state to a Wisconsin investor.
45. Respondents violated Wis. Stat. § 551.403(1) by transacting business as an investment advisor in Wisconsin without being registered under Ch. 551 or exempted from registration under Wis. Stat. § 551.403(2).
46. Respondents violated Wis. Stat. § 551.501(1) - (3) by implementing a scheme to conduct business, in connection with the offer and sale of securities, so as to operate a fraud and deceit upon a Wisconsin investor, including by and through use of misleading and material misstatements or omissions of fact.
47. Respondents, as persons that advise others for compensation as to the value of securities and the advisability of investing, purchasing or selling securities, violated Wis. Stat. § 551.502(1) by employing a device, scheme or artifice to defraud a Wisconsin investor and engaging in an act, practice, or course of business that operated as a fraud or deceit upon a Wisconsin investor.

### **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. Summary Orders issued pursuant to Wis. Stat. § 551.604(2)**

- (a) IT IS ORDERED summarily that RESPONDENTS, their agents, servants, officers, employees, successors, affiliates, and every entity and person directly or indirectly controlled or organized by or on behalf of any RESPONDENT, shall cease and desist from making or causing to be made in or from Wisconsin to any person or entity any further offers or sales of securities unless and until such securities qualify as covered 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 summarily 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 any of the RESPONDENTS, their agents, servants, officers, employees, successors, affiliates, and every entity and person directly or indirectly controlled or organized by or on behalf of any RESPONDENT, are hereby revoked, pursuant to Wis. Stat. §§ 551.604(1)(b) and (2).
- (c) IT IS FURTHER ORDERED summarily 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 RESPONDENTS, their agents, servants, officers, employees, successors, affiliates, and every entity and person directly or indirectly controlled or organized by or on behalf of any RESPONDENT, are hereby revoked, pursuant to Wis. Stat. §§ 551.604(1)(c) and (2).
- (d) IT IS FURTHER ORDERED summarily that RESPONDENTS, their 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 any RESPONDENT, are prohibited from violating Wis. Stat. § 551.501 and Wis. Stat. § 551.502 or successor statutes.
- (e) IT IS FURTHER ORDERED summarily that RESPONDENTS, their 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 either RESPONDENT, are prohibited from violating Ch. 551 or successor statute that might otherwise apply to any offer or sale of a security of or by RESPONDENTS.
- (f) The existence of this Order and its terms shall be disclosed in all offering documents provided in any offering of securities pursuant to Wis. Stat. 551.201 or 551.202.
- (g) PLEASE TAKE NOTICE that the summary orders of the Administrator are effective as of the issuance of this order, pursuant to Wis. Stat. § 551.604(2). You are 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.

## **B. Proposed Orders**

- (h) IT IS PROPOSED that an order be issued against Global-Assets, Inc. and Natasha Berkowitz, jointly and severally, to pay restitution in the amount of **\$526,188.34** with interest on such amount at the legal rate under Wis. Stat. § 138.04, starting from the date of the transaction through the date of satisfaction, pursuant to Wis. Stat. § 551.604(4m). Such payment shall be made payable to the Wisconsin Department of Financial Institutions and shall be remitted to the Division no later than 30 calendar days from the date of issuance of this Order, or if a petition for a hearing is filed as provided under Wis. Stat. § 551.604(2), by a date to be fixed by a final order. Respondents shall contact the Division for written instructions to make the payments before the due date.
- (i) IT IS FURTHER PROPOSED that an order be issued imposing a civil penalty against Global-Assets, Inc. and Natasha Berkowitz, jointly and severally, in the form of an administrative assessment totaling **\$526,188.34** for the violations committed against Investor KS pursuant to Wis. Stat. § 551.604(4). Such payment shall be made payable to the Wisconsin Department of Financial Institutions and shall be remitted to the Division no later than 30 calendar days from the date of issuance of this order, or if a petition for a hearing is filed as provided under Wis. Stat. § 551.604(2), by a date to be fixed by a final order. Respondents shall contact the Division for written instructions to make the payments before the due date.
- (j) IT IS FURTHER PROPOSED that an Order be issued imposing the actual costs of the investigation or proceeding pursuant to Wis. Stat. § 551.604(5) against Respondents.
- (k) IT IS FURTHER PROPOSED that an order be issued prohibiting RESPONDENTS, their 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 RESPONDENTS, from becoming registered in any capacity under Ch. 551 or successor statute that might otherwise apply, prior to satisfying their civil liabilities under Wis. Stat. §§ 551.604(4), (5) and (4m) as ordered in the paragraphs above.

### **C. Service of Order**

- (l) IT IS FURTHER ORDERED that this order shall be sent promptly by email to each party named in the order who has filed a Consent to Electronic Service with the Division. If a Consent to Electronic Service is not on file or has been revoked by the signatory, 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.
- (m) PLEASE TAKE NOTICE that the date of the service of this order is the date it is placed in the mail if service is by certified mail. If a party or the party's attorney is personally served, the date of service is the date service is completed. The date of service by email is the date the email is transmitted. You are 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.

#### **D. Notice of Hearing Rights**

- (n) PLEASE TAKE NOTICE that you have the right to request a hearing pursuant to Wis. Stat. § 551.604(2). Every request for a hearing shall be in the form of a written petition filed with the Division, pursuant to Wis. Admin. Code § DFI-Sec. 8.01 and Wis. Stat. § 227.42. A petition for a hearing to review the order shall:
- (1) Plainly admit or deny each specific allegation, finding or conclusion in the order and incorporated papers. However, if the petitioner lacks sufficient knowledge or information to permit an admission or denial, the petition shall so state, and that statement shall have the effect of a denial; and
  - (2) State all affirmative defenses. Affirmative defenses not raised in the request for hearing may be deemed waived.
- (o) PLEASE TAKE FURTHER NOTICE that you may file your written petition:
- (1) By mailing the written petition to:  
Division of Securities  
Wisconsin Department of Financial Institutions  
P.O. Box 1768  
Madison, Wisconsin 53701;
  - (2) By delivering the written petition in person to:  
Division of Securities  
Wisconsin Department of Financial Institutions  
4822 Madison Yards Way, North Tower, 4<sup>th</sup> Floor  
Madison, Wisconsin 53705; or
  - (3) By faxing the written petition to 608-264-7979.
- (p) PLEASE TAKE FURTHER NOTICE that the petition for hearing must be filed with the Division. Pursuant to Wis. Stat. § 551.102(8), “filing” means “receipt.” Therefore, a petition is not “filed” with the Division until it is actually “received” by the Division. If the Division does not receive your written petition before midnight on the 30<sup>th</sup> day after the date of service of this order, your right to a hearing will be waived and the Summary Order shall become final by operation of law.
- (q) PLEASE TAKE FURTHER NOTICE that, within 15 days after receipt of a request in a record from you, the matter will be scheduled for a hearing or other public administrative proceedings, pursuant to Wis. Stat. §§ 551.604(2) and (3).
- (r) PLEASE TAKE FURTHER NOTICE that if you do not request a hearing and none is ordered by the Administrator within 30 days after the date of service of this order, the findings of fact, conclusions of law, and summary and proposed orders, including any

imposition of civil penalties, disgorgement, restitution, costs, and all applicable interest, become final as by operation of law, pursuant to Wis. Stat. § 551.604(2).

- (s) PLEASE TAKE FURTHER NOTICE violations of this order may be enforced by any investor, or by the Division 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.
- (t) 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.
- (u) PLEASE TAKE FURTHER NOTICE that any willful violation of an order by the Division under Ch. 551 is a criminal offense punishable under the provisions of Wis. Stat. § 551.508.

EXECUTED at Madison, Wisconsin, this 18th day of December, 2025.



A handwritten signature in blue ink, appearing to read "Matthew Lynch".

Matthew Lynch  
Chief Legal Counsel  
Department of Financial Institutions

*On behalf of the Administrator of the Division of Securities*

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



State of Wisconsin
Department of Financial Institutions

Tony Evers, Governor

Wendy K. Baumann, Secretary-designee

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 Global-Assets, Inc. at their last known business address of 1 Letterman Drive, Building A, San Francisco, CA 94129:
i. A copy of the Summary Order to Cease and Desist and Revoking Exemptions Notice of Proposed Order for Restitution and Civil Penalties; DFI Case No. S-251708 (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.

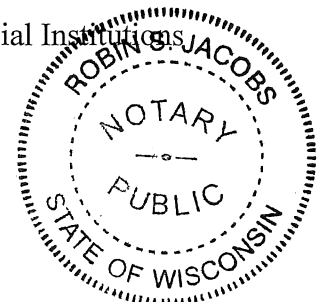
Katherine Clementi
KATHERINE CLEMENTI

State of Wisconsin
Department of Financial Institutions
Division of Securities

Subscribed and sworn to before me
This 23rd day of December, 2025.

Robin Jacobs
Notary Public, State of Wisconsin
My commission is permanent.

(Notary Seal)





State of Wisconsin
Department of Financial Institutions

Tony Evers, Governor

Wendy K. Baumann, Secretary-designee

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 Respondent Global-Assets, Inc.'s Registered Agent Constantin Nicolae Ivan at his last known business address of 1312 17th Street, Unit Num 2955, Denver, CO 80202:
i. A copy of the Summary Order to Cease and Desist and Revoking Exemptions Notice of Proposed Order for Restitution and Civil Penalties; DFI Case No. S-251708 (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.

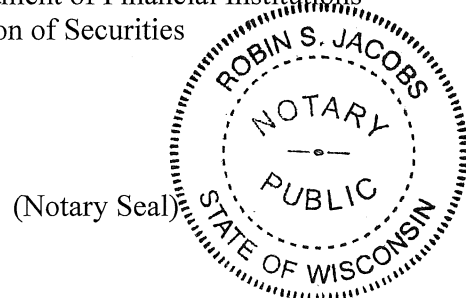
Katherine Clementi

KATHERINE CLEMENTI
State of Wisconsin
Department of Financial Institutions
Division of Securities

Subscribed and sworn to before me

This 23rd day of December, 2025.

Notary Public, State of Wisconsin
My commission is permanent.





State of Wisconsin
Department of Financial Institutions

Tony Evers, Governor

Wendy K. Baumann, Secretary-designee

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

STATE OF WISCONSIN )
) ss.
COUNTY OF DANE )

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- 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 Global-Assets, Inc. at their last known business address of 3447 Willis Avenue, Jacksonville, FL 32202:
i. A copy of the Summary Order to Cease and Desist and Revoking Exemptions Notice of Proposed Order for Restitution and Civil Penalties; DFI Case No. S-251708 (EX); and
ii. A copy of this Affidavit of Service.
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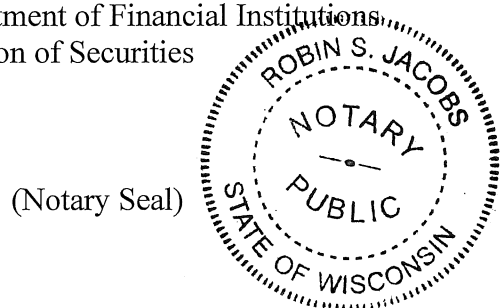
I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Katherine Clementi
KATHERINE CLEMENTI

State of Wisconsin
Department of Financial Institutions
Division of Securities

Subscribed and sworn to before me
This 23rd day of December, 2025.

Robin Jacobs
Notary Public, State of Wisconsin
My commission is permanent.





State of Wisconsin
Department of Financial Institutions

Tony Evers, Governor

Wendy K. Baumann, Secretary-designee

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 email upon Global-Assets, Inc. at alassets898@outlook.com:
i. A copy of the Summary Order to Cease and Desist and Revoking Exemptions Notice of Proposed Order for Restitution and Civil Penalties; DFI Case No. S-251708 (EX); and
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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

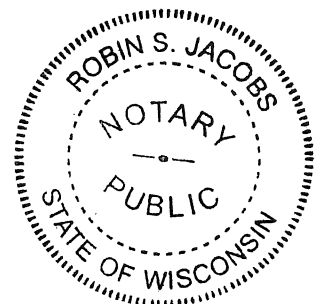
State of Wisconsin
Department of Financial Institutions
Division of Securities

Subscribed and sworn to before me
This 23rd day of December, 2025.

Robin Jacobs

Notary Public, State of Wisconsin
My commission is permanent.

(Notary Seal)





State of Wisconsin
Department of Financial Institutions

Tony Evers, Governor

Wendy K. Baumann, Secretary-designee

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 email upon Natasha Berkowitz at natashaberkowitz7@gmail.com:
i. A copy of the Summary Order to Cease and Desist and Revoking Exemptions Notice of Proposed Order for Restitution and Civil Penalties; DFI Case No. S-251708 (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
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