

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

---

In the Matter of,

SCA COMMUNITY;  
TITANXEXCHANGE;  
EVANDER ELLIS; and  
KATHERINE MONROE

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

Respondents.

DFI Case No. S-251636 (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. Stat. 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. Upon information and belief, at all relevant times, SCA Community purported to be an unincorporated association offering investors AI related investment services and education. Division staff identified two websites for the SCA Community located at [www.scacommunity.com](http://www.scacommunity.com) and [www.sca-ai.com](http://www.sca-ai.com). The SCA Community has an email address of [service@sca-ai.com](mailto:service@sca-ai.com). The SCA Community has a purported physical address of 15050 NE 36<sup>th</sup> Street, Redmond, WA 98052. However, this address is associated with a campus building owned by Microsoft. Domain registration information indicates the domain users are located in China and Vietnam.
2. At all relevant times, TitanXExchange has been affiliated with the website [www.titanexchange.com](http://www.titanexchange.com) and is an online investment platform and cryptocurrency exchange. The website is registered with InterNetX GmbH out of Germany, which was not responsive to a subpoena issued by the Division to determine ownership of the website. The website was registered on July 4, 2025. TitanXExchange does not have a physical

address or phone number, but users were directed to communicate via email to [service@titanxexchange.com](mailto:service@titanxexchange.com).

3. Evander Ellis (“Ellis”) is the purported founder of the SCA Community. Ellis is described on the SCA Community website as having over 30 years of experience on Wall Street and as having held “senior positions at several top hedge funds, serving as both a quantitative analyst and investment manager.” Despite the claims made about his tenure and experience, the Division was unable to locate any substantial online presence for Ellis. His Telegram Handle is @SCA\_Club.
4. Katherine Monroe (“Monroe”) is likely an alias for one or more control persons of SCA Community and/or TitanXExchange. Her Telegram Handle is @Happy\_KM01.

## Conduct

### *SCA COMMUNITY*

5. The SCA Community’s main website is [www.scacommunity.com](http://www.scacommunity.com). According to the website, “At SCA, we are driven by a passion for empowering investors with cutting-edge tools and knowledge to maximize profitability and ensure long-term financial success. Our focus is to help you enhance your investment skills, grow your wealth, and minimize risks through a combination of expert education, AI-powered solutions, and proven strategies.”
6. The SCA Community website offered online courses, “expert financial guidance,” and “high-quality services,” and it touted that it was “trusted by investors worldwide.” Although the SCA Community claimed to have been in business for over 30 years, the website had been registered for only a few months by a user located in China. Furthermore, the SCA Community boasted of overall returns exceeding 85% and having a 98% satisfaction rate.
7. The cornerstone of the SCA Community’s products and services was artificial intelligence. According to the website, “SCA’s AlgoFusion system leverages advanced AI to provide personalized investment strategies, real-time analysis, and enhanced decision-making.”
8. The SCA Community website identified five people as part of their “team”:
  - Evander Ellis – Founder
  - Michael Johnson – CFA
  - David Anderson – Quantitative Trader
  - James Williams – CFP
  - Sarah Thompson – MBA
9. Utilizing a reverse image search, the Division determined that the photograph used to depict Sarah Thompson is actually the photo of an executive of another corporate firm.
10. The SCA Community has a secondary website, [www.sca-ai.com](http://www.sca-ai.com), which falsely states that the SCA Community is located at 15050 NE 36<sup>th</sup> Street, Redmond WA 98052. In fact, that

address is associated with a campus building owned by Microsoft. Further, the website had been recently registered by a domain user located in Vietnam.

### ***TITANXEXCHANGE***

11. The TitanXExchange, located at [www.titanxexchange.com](http://www.titanxexchange.com), promoted itself as an online investment platform and cryptocurrency exchange. The website was registered on July 4, 2025.
12. Even though it had only been registered for a few months, the website boasted that TitanXExchange was “the choice of tens of millions of WEB 3.0 practitioners.”
13. TitanXExchange offered cryptocurrency trading, futures trading, ICO token purchasing, stock trading, and staking of cryptocurrency (hereinafter referred to as TitanXExchange’s “Securities Offerings”). The website also advertised “AI artificial intelligence algorithm trading.” For its staking offerings, TitanXExchange offered percentage rates ranging from 10.5% to 65%.
14. Finally, in the “About Us” section of the website, TitanXExchange claimed that its parent company is a “top international financial technology group ranked in the top 10 in the world.”

### ***The Securities Offering to a Wisconsin Investor***

15. On or about July of 2025, the SCA Community contacted [REDACTED] (“Investor LL”), a resident of Mazomanie, Wisconsin, via the social media communications application WhatsApp. Thereafter, Investor LL became part of an online group called “SCA Market Signals” on WhatsApp. Investor LL believed the SCA Community delivered a well-balanced investment platform, blending AI powered tools with hands on financial education.
16. A member of the online group who referred to herself as Monroe promoted investment opportunities on TitanXExchange, directed Investor LL to the platform, and walked him through the process of setting up a TitanXExchange account.
17. Once an account was established, on or about July 23, 2025, Investor LL began making deposits into the TitanXExchange investment account by transferring cryptocurrency from his Coinbase account. Investor LL sent a total of \$32,652.24 to TitanXExchange for the purpose of investing.
18. Investor LL was able to log into the TitanXExchange website and view trades that had been conducted in his account. When the account began losing value, Investor LL conducted a test withdrawal of \$100, which was successful.
19. Investor LL then attempted to withdraw \$9,000 from his TitanXExchange account, but that withdrawal did not go through. Investor LL then began receiving messages on the

TitanXExchange platform informing him that his account was on a temporary hold due to having frequent large deposits and withdrawals from the account. Investor LL's attempts to contact the platform were unsuccessful.

20. On September 3, 2025, Investor LL discovered that a total of \$30,833.73 had been withdrawn from his TitanXExchange account, leaving him with a balance of only \$375.04. At that point, Investor LL contacted the Dane County Sheriff's Office to report the fraud.
21. The SCA Community's main website, which was viewed by Investor LL, contained numerous misrepresentations. Among other things, it touted a business history and expertise that were non-existent and exaggerated rates of return. It also falsely identified at least one person on its management team and failed to provide accurate contact information for the business or its employees. The SCA Community's secondary website provided a false physical address.
22. Similarly, the TitanXExchange website, which was also viewed by Investor LL, also contained numerous misrepresentations. For example, the website, which had only been registered for a few months, falsely claimed to be "the choice of tens of millions of WEB 3.0 practitioners" and promoted exaggerated returns of up to 65% for its staking program. Furthermore, TitanXExchange claimed its parent company was a "top international financial technology group ranked in the top 10 in the world." However, the business failed to disclose the identity of the parent company anywhere on its website.
23. Contrary to the representations of Respondents, Investor LL's funds were never invested in a cryptocurrency trading platform. Instead, Investor LL's funds were commingled with other cryptocurrencies, converted from USDC to Tether, split up into a plethora of different smaller amounts, and transferred through multiple unhosted wallets, ultimately landing on multiple different exchanges. Based on the movements of the funds, Division staff have determined that Investor LL's funds are not recoverable.
24. The TitanXExchange's Securities Offerings promoted by Respondents required the investment of money in the investment programs managed by Respondents, from which the investor expected profits to be derived from the efforts of others.
25. Respondents, for compensation, engaged in the business of advising Investor LL as to the value of securities and the advisability of investing in and purchasing securities in this state.
26. Investor LL was a passive investor, providing investment funds to Respondents, but having no control or access to the account held by TitanXExchange. The investment was entirely managed by Respondents.
27. Respondents designed the securities investment programs to accept offers to purchase from investors in Wisconsin and allow Wisconsin investors to enroll in their passive income investment program.

28. In connection with the offers of securities, Respondents failed to disclose the firm's financial statements, including its assets, liabilities, and profitability; the risks of investing in cryptocurrency transactions on the TitanXExchange platform; the true nature of their Securities Offerings; and restrictions on withdrawal of funds from the platform.
29. In addition, Respondents affirmatively misrepresented the location of the SCA Community and TitanXExchange, the identity and location of the principals and control persons, the number of traders using the platform and the rate of return of their Securities Offerings.
30. At no time were Respondents registered with the Division in any capacity.

## **B. Conclusions of Law**

### **Legal Authority and Jurisdiction**

31. 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.
32. Notes and other evidence of indebtedness constitute securities under Wis. Stat. § 551.102(28).
33. The Securities Offerings offered and sold by Respondents to Investor LL, whereby Respondents received funds from Investor LL 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).
34. An investment contract constitutes a security under Wis. Stat. § 551.102(28)(d)(1).
35. The transactions between Respondents and Investor LL were an investment contract, including as defined by Wis. Stat. § 551.102(28)(d)(1), because Investor LL invested in a common enterprise with the expectation of profits to be derived through the essential managerial efforts of someone other than Investor LL, namely Respondents.
36. The transactions between Respondents and Investor LL also constituted an investment contract, pursuant to Wis. Stat. § 551.102(28)(d)(2), because Respondents induced Investor LL to furnish funds to Respondents based on representations from Respondents by which Investor LL reasonably understood that a valuable benefit of some kind over and above the initial funds would accrue to him as a result of the operation of the enterprise, and with Investor LL not having the right to exercise practical and actual control over the managerial decisions of the enterprise.
37. The investment contracts sold by Respondents to Investor LL were required to be, but were not, registered with the Division.

38. 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, are federally covered securities, or are exempted from registration under Ch. 551.
39. 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).
40. 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).
41. Respondents transacted business as a broker-dealer as defined under Wis. Stat. § 551.102(4) and Wis. Admin. Code § DFI Sec. 1.02(5).
42. 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.
43. 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).
44. 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.
45. 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.
46. 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.
47. 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:

48. Respondents violated Wis. Stat. § 551.301 by offering and selling unregistered securities in this state to a Wisconsin investor.
49. 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).
50. 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).
51. 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.
52. Respondents violated Wis. Stat. § 551.502(1) when advising others for compensation as to the value of securities and the advisability of investing, purchasing, or selling securities employed a device, scheme, or artifice to defraud upon a Wisconsin investor and engaged 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 Respondents, jointly and severally, to pay restitution in the amount of **\$30,833.73** 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 reach out to 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 Respondents, jointly and severally, in the form of an administrative assessment totaling **\$30,833.73** for the violations committed against Investor LL 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 reach out to 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
- (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", written over a horizontal line.

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 email upon SCA Community at service@sca-ai.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-251636 (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.

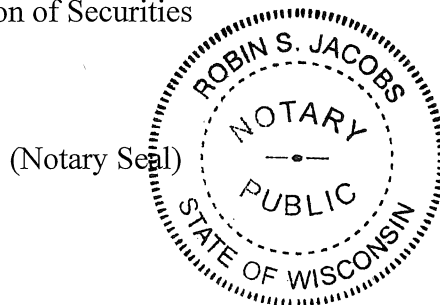
Katherine Clementi
KATHERINE CLEMENTI

State of Wisconsin
Department of Financial Institutions
Division of Securities

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

[Signature of Robin S. 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 certified mail upon SCA Community at their last known business address 15050 NE 36th Street, Redmond, WA 98052:
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-251636 (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.

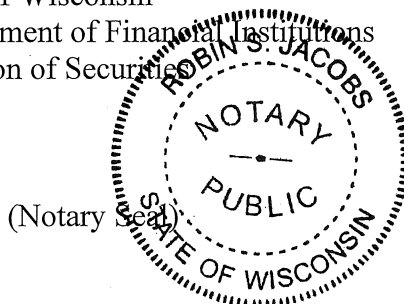
I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Katherine Clementi
KATHERINE CLEMENTI

State of Wisconsin
Department of Financial Institutions
Division of Securities

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

Ravi Jain
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 TitanXExchange at service@titanxexchange.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-251636 (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

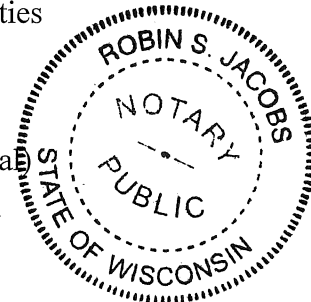
State of Wisconsin
Department of Financial Institutions
Division of Securities

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

Rain Davis

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, VALERIE SCHMIDT, 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 via Telegram upon Evander Ellis at @SCA\_Club:
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-251636 (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.

Valerie Schmidt
VALERIE SCHMIDT

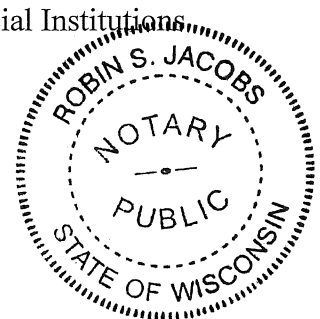
State of Wisconsin
Department of Financial Institutions
Division of Securities

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, VALERIE SCHMIDT, 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 via Telegram upon Katherine Monroe at @Happy\_KM01:
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-251636 (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.

Valerie Schmidt
VALERIE SCHMIDT

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.

