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

In the Matter of, CHOICETRADEEDGE.COM; KEITH FLETCHER; CLINTON KUPAY ONYEISI; SIMON SOLOMON; EUGENE OKEOGHENE AMINOMO; EMMANUEL OGEDENGBE; AND CHIKESIRIM ADELE, Respondents.	SUMMARY ORDER TO CEASE AND DESIST, REVOKING EXEMPTIONS, AND IMPOSING RESTITUTION AND CIVIL PENALTIES DFI Case No. S-252398 (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. At all relevant times, choicetradeedge.com was a website which hosted a purported digital asset trading platform. Choicetradeedge.com was registered with NameSilo effective December 28, 2025 by persons operating out of Nigeria.

2. Keith Fletcher ("Fletcher") is likely an alias for one or more control persons of choicetradeedge.com. His WhatsApp phone number which was used to communicate with a Wisconsin investor is 813-508-4476.

3. Clinton Kupay Onyeisi ("Onyeisi"), of Nigeria, owned or controlled a crypto account with Bybit through which a Wisconsin investor's stolen funds were received and transferred out. The email address associated with his Bybit account is: youdylearnwork@gmail.com.

4. Simon Solomon ("Solomon"), of Nigeria, owned or controlled a crypto account with Bybit through which a Wisconsin investor's stolen funds were received and transferred out. The email address associated with his Bybit account is: grantemerson379@gmail.com.

5. Eugene Okeoghene Aminomo ("Aminomo"), of Nigeria, owned or controlled a crypto account with Bybit through which a Wisconsin investor's stolen funds were received and transferred out. The email address associated with his Bybit account is: eugene.okeoghene@gmail.com.

6. Emmanuel Ogedengbe ("Ogedengbe"), of Nigeria, owned or controlled a crypto account with Binance through which a Wisconsin investor's stolen funds were received and transferred out. The email address associated with his Binance account is: ovezebabatunde@gmail.com.

7. Chikesirim Adele ("Adele"), of Nigeria, owned or controlled a crypto account with Binance through which a Wisconsin investor's stolen funds were received and transferred out. The email address associated with his Binance account is: chikeadele@gmail.com.

Conduct

CHOICETRADEEDGE.COM

8. The landing page for choicetradeedge.com stated in relevant part: "Stock Trading For the serious. Multi-asset investing with industry-leading yields. Stocks, bonds, crypto, and options – all in one powerful platform."

9. The regulatory information page for choicetradeedge.com stated choicetradeedge.com was a registered broker-dealer under the name of Trade Capital Markets North America, LLC, and claimed membership with the SEC, FINRA and SIPC. This information is false. No entity with the name Trade Capital Markets North America, LLC has ever been a member of FINRA or the SEC or SIPC.

10. The CRD number provided on choicetradeedge.com's regulatory information page belongs to a legitimate registered financial firm with a similar name, Trade Capital Markets (TCM) North America LLC ("TCM"). The legitimate firm TCM was formed in 2021 and is located in Tennessee. Further, TCM does not have a website. Thus, choicetradeedge.com was impersonating TCM's regulatory status on its website.

11. The regulatory information page for choicetradeedge.com also claimed choicetradeedge.com was a registered investment advisor with the SEC under the name Trade All Markets Group LLC. This information is false. No entity with the name Trade All Markets Group LLC has ever been a member of FINRA or the SEC.

12. The regulatory information page also asserted protection under FDIC and claimed to have a network of 20+ partner banks. It also provided customer service contact information for filing complaints: compliance@choicetradeedge.com and 1-800-TRADE-01.

13. The choicetradeedge.com's customer service phone number belongs to Crown Lake Resort & Spa in Arkansas.

Investor [redacted] ("ED")

14. On or about January 2026, Investor ED of Cuba City, Wisconsin was searching online for opportunities to invest her Roth IRA funds in the amount of approximately $70,000.

15. Eventually, ED joined a Facebook group called DCI Dividend and Income Compounding Club ("DCI Group"). After she posted in the DCI Group Facebook page, ED received numerous messages from group members telling her to reach out to Fletcher on WhatsApp at 813-508-4476.

16. Unbeknownst to ED, DCI Group was an imposter scam of a private, subscription-based investment service which alerted the public to scams of its business on September 2, 2025 on a blog post.

17. ED followed the imposter DCI Group's instructions and reached out to Fletcher on WhatsApp. Fletcher explained that under his mentorship program he would send out trading signals via WhatsApp and Telegram that users would then use to make profitable cryptocurrency trades.

18. Fletcher described the mentorship program to ED as follows:

> "I offer a comprehensive mentorship program designed to guide stock traders/investors of all levels toward achieving their investment goals. This includes step-by-step support for setting up brokerage accounts, mastering stock trading strategies, and understanding market fundamentals. Along with this, I provide strategic stock trading signals based on detailed market analysis, offering clear instructions on when to enter and exit trades to help you capitalize on opportunities.
>
> Additionally, I offer portfolio management strategies to balance short-term trades and long-term investments for maximum returns, all while managing risk effectively. Educational support, including resources on technical analysis, market trends, and risk management, is also part of the program. To ensure your success, I create personalized plans that align with your financial goals and trading style."

19. ED told Fletcher she did not have "a clue" how to invest her money and that she had never participated in a mentorship program before. He responded:

> "I'll be introducing you to options/day trading where you'll actively trade your own account using the strategy I provide. At your stage, 2-3 trades per day is ideal. With consistency and proper execution you can reasonably target weekly returns in the range of 15-100% depending on market conditions. I will recommend a trading broker that allow you to set conditional orders (e.g., limit orders, stop-loss) to automate trade execution. This can help you manage trades even if you're unavailable at that moment. You can use tools like signal integration to execute trades for you. This way you won't have to constantly monitor signals it won't disrupt your work or rest schedule."

20. Among other things, ED asked Fletcher how he would be compensated for his services, Fletcher replied "we don't charge until you multiplied your initial investment by 10X and then we receive 5%." Fletcher also stated, "This performance-based model ensures that my success is directly tied to yours, aligning our goals to maximize your investment returns without any upfront costs." Fletcher also claimed the fees came only from profits, and that he did not have custody of her funds.

21. ED continued to communicate with Fletcher for a few weeks before ultimately deciding to invest.

22. At Fletcher's direction, on or about February 14, 2026, ED opened a Coinbase account, purchased $20,000 of ETH and transferred the funds to her newly created Exodus Wallet. At Fletcher's direction she then transferred the ETH from her Exodus Wallet to an address 0xce4...350aeb79. Unbeknownst to ED, this address had been the subject of a Chainabuse complaint dated January 30, 2026 alleging the owner of the address was conducting an imposter teaching and trading scam using a fake trading platform.

23. Flether then sent ED the following message via WhatsApp:

> "The options trading brokerage I'm recommending is choicetradeedge.com. It's a platform that involves ETH and XRP-funding method. It operates internationally and is built for speed, flexibility and access to leveraged trades. ETH is preferred because of its low transaction fees and quick confirmation times. Once funded, the ETH is instantly converted to USD within the trading platform to execute stock, crypto and option trades.
> Option trading works on both stock and crypto and we can dive in whichever at any moment."

24. He described how the program works as follows:

> "I'll provide you with trading signals and insights needed to identify where and what to invest, determine how much to invest and analyze trends to gauge potential stock movements. My goal is to empower you to make informed decisions.
> The program is a personalized, one-on-one mentorship, offering real-time guidance and tailored support to suit your goals, so no need to worry about making mistakes. The focus is on building your confidence and competence while growing your portfolio."

25. ED proceeded to conduct trades on the so-called choicetradeedge.com platform with Fletcher's assistance. She regularly expressed her confusion to Fletcher and asked for clarification, as set forth in the following exchange which occurred on February 17, 2026:

> **ED**: "When you have a minute can you explain what I just did there? Like whats the 2x, 8 hrs, stop loss 20 and all those inputs mean? No rush. I know you're busy."
> **Fletcher**: "Sure!"
> (the next day)
> **Fletcher**: "Good morning!"
> "The 2x Leverage, this means the position size is doubled relative to the capital allocated. So instead of controlling 15,000 worth of shares, the position controls 30,000. Leverage amplifies both gains and losses, which is why we pair it with strict risk management.

8-Hour Time Interval, this refers to the chart timeframe used for analysis. Each candlestick represents 8 hours of price movement. It helps identify the trend and timing for entry and exit. You don't need to be glued to your screen all day as the trade will automatically close in the 8 hour time interval

Stop Loss – 20, This is the maximum loss threshold set on the trade. If the position reaches this risk limit, it will automatically close to protect capital. This ensures we control downside risk.

Every part of the setup is structured to balance opportunity with risk control. The leverage, stop loss, and take profit are all there to make sure we're managing the trade professionally rather than emotionally."

ED: "Will do. Thank you for all this great info!"

Fletcher: "You are welcome! I want to be transparent with you I can't guarantee how often I'll be able to send signals on a weekly basis as it depends on market conditions and portfolio sizing. That said your account is performing well and to help you take more signals consistently, it would be beneficial to move some of your other investments into your options trading account. This will give us more flexibility, allow me to provide more signals and help push your account forward. It also puts you on the right path toward qualifying for our elite GoldLine group where you can learn about the trade, which is ideal once you have $100-200K and above in your portfolio."

26. When ED informed Fletcher she may have more money to invest, he sent ED the following message to encourage further investments:

> "To comfortably pursue your targets, increasing your portfolio to the 100-200k range would put us in a much stronger position. It allows for proper allocation across multiple trades while maintaining disciplined risk management. This gives us room to operate strategically rather than forcing limited capital into fewer opportunities.
> You don't need to worry at all, that's exactly what I'm here for.
> Our program is structured so that I handle the strategy, timing and risk management, and I guide you step by step. Having more funds does give us greater flexibility. It allows for better allocation across multiple trades and stronger risk management without overexposing any single position. We'll grow this strategically and responsibly. And as we move forward, you'll understand more and more about how everything works. If you ever have questions, I'm always here to explain."

27. ED continued to follow Fletcher's instructions for what she thought were four or five successful trades. She believed those trades netted her approximately $1,600 return on her initial $20,000 investment of ETH. Because ED believed she was making profitable trades based on Fletcher's management, she decided to invest additional funds into the platform.

28. Accordingly, on or about February 24, 2026, ED purchased approximately $50,000 worth of ETH on her Coinbase application, sent the ETH to her Exodus Wallet and then ultimately transferred the ETH to the address 0xce4…350aeb79 associated with choicetradeedge.com. Shortly after the $50,000 deposit, withdrawals were no longer working on the choicetradeedge.com platform.

29. The Division's investigation disclosed that ED made two ETH transactions totaling 35.50891196 ETH, equivalent to approximately $68,181 in USD. Through various transactions and swaps, her ETH was swapped to USDT on the Tron blockchain. From there, her funds were broken up and/or commingled with additional cryptocurrencies and sent out to various VASPs including Bybit, Binance, and KuCoin.

30. Some of ED's funds were sent to Bybit accounts. 1200 USDT of commingled funds was sent to Bybit account TTNs...PpqDjz. Bybit's KYC information indicates this account was owned by Onyeisi. As of March 2026, only approximately $2.01 remained in the account.

31. In addition, 1000 USDT of commingled funds was sent to Bybit account TKvSo...bC8YCk. Bybit's KYC information indicates this account was owned by Solomon. As of March 2026, this account had a zero balance.

32. In addition, 8030 USDT of commingled funds was sent to Bybit account TVDV...JJQE. Bybit's KYC information indicates this account was owned by Aminomo. As of March 2026, this account had a balance of approximately $712.77.

33. Some of ED's funds were sent to Binance accounts. 8000.784 USDT of commingled funds was sent to address TQ2A...GZdjo. Binance's KYC information indicates this account was owned by Ogedengbe. As of March 2026, $7,274.54 remained in this account.

34. In addition, 350.1 USDT of commingled funds was sent to Binance address TWXbp...BhBA. Binance's KYC information indicates this account was owned by Adele. As of March 2026, this account had a balance of approximately $1.40.

35. Division staff were able to blocklist 64,558.918095 USDT of commingled funds which was sent to an unhosted wallet address: TQsUub...5eW6. ED's share of ETH held at that address is 23000 USDT, which is about 35% of the total blocklisted amount.

36. Upon information and belief, the following individuals materially aided Fletcher and choicetradeedge.com to employ an act, practice and a course of business in connection with the offer, sale or purchase of a security which constitute violations of the Wisconsin Uniform Securities Law: Onyeisi; Solomon; Aminomo; Ogedengbe; and Adele.

37. The Facebook DCI Group was an imposter scam which was viewed by ED and directed her to Fletcher and the choicetradeedge.com website. The website misrepresented its customer service phone number, its regulatory status, and its business expertise. Fletcher falsely promoted a one-to-one mentorship program promising outrageous returns, and no commissions until ED achieved 10X returns. In addition, Fletcher falsely stated that he did not have custody ED's funds and sent out fake signals of fake trades with false returns. He falsely represented his identity, expertise, the security of ED's investments, and presented choicetradeedge.com as a legitimate trading platform, which it was not.

38. The Respondents Fletcher and choicetradeedge.com's one-to-one mentorship program described above required the investment of money into the investment programs managed

by Fletcher and choicetradeedge.com from which the investor expected profits to be derived from the efforts of Fletcher and choicetradeedge.com.

39. Respondents Fletcher and choicetradeedge.com, for compensation, engaged in the business of advising investors like ED as to the value of securities and the advisability of investing in and purchasing securities in this state.

40. Respondents Fletcher and choicetradeedge.com's investment program was a passive investment opportunity entirely managed by them, with no control or input from the investors. As Fletcher informed ED: "I handle the strategy, timing and risk management, and I guide you step by step."

41. Respondents Fletcher and choicetradeedge.com 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.

42. At no time were any of the Respondents registered with the Division in any capacity.

B. Conclusions of Law

Legal Authority and Jurisdiction

43. 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.

44. Notes and other evidence of indebtedness constitute securities under Wis. Stat. § 551.102(28).

45. The purported investments programs offered by Respondents Fletcher and choicetradeedge.com to ED, whereby Respondents were to receive funds from ED to be held on account for her benefit and were used to engage in profit seeking investment and speculation based on the recommendations of the Respondents, constituted a note or other evidence of indebtedness as provided in Wis. Stat. § 551.102(28).

46. An investment contract constitutes a security under Wis. Stat. § 551.102(28)(d)(1).

47. The Respondents Fletcher and choicetradeedge.com's purported investment programs were an investment contract, including as defined by Wis. Stat. § 551.102(28)(d)(1), because they involved investing in a common enterprise with the expectation of profits to be derived through the essential managerial efforts of someone other than the investor, namely Respondents Fletcher and choicetradeedge.com.

48. The Respondents Fletcher and choicetradeedge.com's purported investment programs also constituted an investment contract, pursuant to Wis. Stat. § 551.102(28)(d)(2), because Respondents induced investors to furnish funds to Respondents based on their representations, where the funds would be subject to the risks of the enterprise, and the representations would give rise to a reasonable understanding that a valuable benefit of

some kind over and above the initial funds would accrue to investors as a result of the operation of the enterprise, and where investors did not have the right to exercise practical and actual control over the managerial decisions of the enterprise.

49. The notes, evidence of indebtedness, and investment contracts offered by Respondents to ED were required to be, but were not, registered with the Division.

50. 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.

51. 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).

52. 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).

53. Respondents Fletcher and choicetradeedge.com transacted business as broker-dealers as defined under Wis. Stat. § 551.102(4) and Wis. Admin. Code § DFI-Sec. 1.02(10).

54. 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.

55. 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).

56. Respondents Fletcher and choicetradeedge.com transacted business as an investment adviser as defined under Wis. Stat. § 551.102(15).

57. 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.

58. 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.

59. 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.

60. Pursuant to Wis. Stat. § 551.502(1)(a) and (b), 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:

61. Respondents Fletcher and choicetradeedge.com 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).

62. Respondents Fletcher and choicetradeedge.com violated Wis. Stat. § 551.301 by offering unregistered securities in this state to a potential Wisconsin investor.

63. Respondents Fletcher and choicetradeedge.com 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).

64. Respondents Fletcher and choicetradeedge.com violated Wis. Stat. § 551.501(1) and Wis. Admin. Code § DFI-Sec. 6.01 when in connection with the offer, sale, or purchase of a security, Respondents employed a device, scheme or artifice to defraud ED. The Facebook DCI Group was an imposter scam which was viewed by ED and directed her to Fletcher and the choicetradeedge.com website. The website misrepresented its customer service phone number, its regulatory status, and its business expertise. Fletcher falsely promoted a one-to-one mentorship program promising outrageous returns, and no commissions until ED achieved 10X returns. In addition, Fletcher falsely stated that he did not custody ED's funds and sent out fake signals of fake trades with false returns. He falsely represented his identity, expertise, the security of ED's investments, and presented choicetradeedge.com as a legitimate trading platform, which it was not.

65. The individual Respondents Onyeisi, Solomon, Aminomo, Ogedengbe, and Adele materially aided Respondents Fletcher and choicetradeedge.com to violate Wis. Stat. § 551.501(1) and Wis. Admin. Code § DFI-Sec. 6.01 by owning and controlling crypto

accounts with Bybit and Binance through which ED's stolen funds were received and transferred out.

66. Respondents Fletcher and choicetradeedge.com, materially aided by Onyeisi, Solomon, Aminomo, Ogedengbe, and Adele, violated Wis. Stat. § 551.501(2) when in connection with the offer, sale, or purchase of a security, Respondents omitted statements of material fact and made misrepresentations of material facts to ED, including by, among other things, creating the imposter Facebook DCI Group which was viewed by ED and directed her to Fletcher and the choicetradeedge.com website. The website misrepresented its customer service phone number, its regulatory status, and its business expertise. Fletcher falsely promoted a one-to-one mentorship program promising outrageous returns, and no commissions until ED achieved 10X returns. In addition, Fletcher falsely stated that he did not have custody ED's funds and sent out fake signals of fake trades with false returns. He falsely represented his identity, expertise, the security of ED's investments, and presented choicetradeedge.com as a legitimate trading platform, which it was not.

67. Respondents Fletcher and choicetradeedge.com, materially aided by Onyeisi, Solomon, Aminomo, Ogedengbe, and Adele, violated Wis. Stat. § 551.501(3) when in connection with the offer, sale, or purchase of a security, Respondents omitted statements of material fact and made misrepresentations of material facts to ED, including by, among other things, creating the imposter Facebook DCI Group which was viewed by ED and directed her to Fletcher and the choicetradeedge.com website. The website misrepresented its customer service phone number, its regulatory status, and its business expertise. Fletcher falsely promoted a one-to-one mentorship program promising outrageous returns, and no commissions until ED achieved 10X returns. In addition, Fletcher falsely stated that he did not custody ED's funds and sent out fake signals of fake trades with false returns. He falsely represented his identity, expertise, the security of ED's investments, and presented choicetradeedge.com as a legitimate trading platform, which it was not.

68. Respondents Fletcher and choicetradeedge.com, as persons that advise others for compensation as to the value of securities and the advisability of investing, purchasing or selling securities, and materially aided by Onyeisi, Solomon, Aminomo, Ogedengbe, and Adele, violated Wis. Stat. § 551.502(1)(a) by employing a device, scheme or artifice to defraud ED including by, among other things, creating the imposter Facebook DCI Group which was viewed by ED and directed her to Fletcher and the choicetradeedge.com website. The website misrepresented its customer service phone number, its regulatory status, and its business expertise. Fletcher falsely promoted a one-to-one mentorship program promising outrageous returns, and no commissions until ED achieved 10X returns. In addition, Fletcher falsely stated that he did not custody ED's funds and sent out fake signals of fake trades with false returns. He falsely represented his identity, expertise, the security of ED's investments, and presented choicetradeedge.com as a legitimate trading platform, which it was not.

69. Respondents Fletcher and choicetradeedge.com, as persons that advise others for compensation as to the value of securities and the advisability of investing, purchasing or selling securities, and materially aided by Onyeisi, Solomon, Aminomo, Ogedengbe, and

Adele, violated Wis. Stat. § 551.502(1)(b) by engaging in an act, practice, or course of business that operated as a fraud or deceit upon ED including by, among other things, creating the imposter Facebook DCI Group which was viewed by ED and directed her to Fletcher and the choicetradeedge.com website. The website misrepresented its customer service phone number, its regulatory status, and its business expertise. Fletcher falsely promoted a one-to-one mentorship program promising outrageous returns, and no commissions until ED achieved 10X returns. In addition, Fletcher falsely stated that he did not have custody ED's funds and sent out fake signals of fake trades with false returns. He falsely represented his identity, expertise, the security of ED's investments, and presented choicetradeedge.com as a legitimate trading platform, which it was not.

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) 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

(g) IT IS PROPOSED that an order be issued against Fletcher and choicetradeedge.com, jointly and severally, to pay restitution in the amount of $70,000 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 Fletcher and choicetradeedge.com shall contact the Division for written instructions to make the payments before the due date.

(h) IT IS FURTHER PROPOSED that an order be issued imposing a civil penalty against Fletcher and choicetradeedge.com, jointly and severally, in the form of an administrative assessment totaling $70,000 for the violations committed against Investor ED 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 Fletcher and choicetradeedge.com 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 the actual costs of the investigation or proceeding pursuant to Wis. Stat. § 551.604(5) against RESPONDENTS Fletcher and choicetradeedge.com.

(j) 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

(k) 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 US 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 and Wis. Stat. § 227.48. This order shall also be served upon the office of the administrator pursuant to Wis. Stat. § 551.611.

(l) 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 US 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

(m) 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.

(n) 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, 4th Floor
Madison, Wisconsin 53705; or

(3) By faxing the written petition to 608-264-7979.

(o) 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 30th 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.

(p) 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).

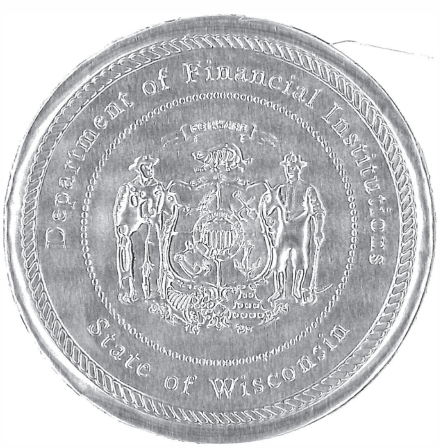
(q) PLEASE TAKE FURTHER NOTICE that if you do not request a hearing and none is ordered by the Administrator within 30 days after the date of service of this order, the findings of fact, conclusions of law, and summary and proposed orders, including any imposition of civil penalties, disgorgement, restitution, costs, and all applicable interest, become final as by operation of law, pursuant to Wis. Stat. § 551.604(2).

(r) 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.

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

(t) 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 28th day of April, 2026.



Leslie M. Van Buskirk
Administrator

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 WhatsApp upon Keith Fletcher at 813-508-4476:

   i. A copy of the Summary Order to Cease and Desist, Revoking Exemptions, and Imposing Restitution and Civil Penalties; DFI Case No. S-252398 (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 30th day of April, 2026.

Robin Jacobs

Notary Public, State of Wisconsin

My commission is permanent.

(Notary Seal)

ROBIN S. JACOBS
NOTARY
PUBLIC
STATE OF WISCONSIN

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 Clinton Kupay Onyeisi at youdylearnwork@gmail.com:

   i. A copy of the Summary Order to Cease and Desist, Revoking Exemptions, and Imposing Restitution and Civil Penalties; DFI Case No. S-252398 (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 30th day of April, 2026.

Rai Jacobs

Notary Public, State of Wisconsin
My commission is permanent.

(Notary Seal)

ROBIN S. JACOBS
NOTARY
PUBLIC
STATE OF WISCONSIN

**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 Simon Solomon at grantemerson379@gmail.com:

   i. A copy of the Summary Order to Cease and Desist, Revoking Exemptions, and Imposing Restitution and Civil Penalties; DFI Case No. S-252398 (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 30th day of April, 2026.

Robin Jacobs

Notary Public, State of Wisconsin

My commission is permanent.

(Notary Seal) ROBIN S. JACOBS NOTARY PUBLIC STATE OF WISCONSIN

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 Eugene Okeoghene Aminomo at eugene.okeoghene@gmail.com:

   i. A copy of the Summary Order to Cease and Desist, Revoking Exemptions, and Imposing Restitution and Civil Penalties; DFI Case No. S-252398 (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 30th day of April, 2026.

Robin Jacobs

Notary Public, State of Wisconsin
My commission is permanent.

(Notary Seal)

ROBIN S. JACOBS NOTARY PUBLIC STATE OF WISCONSIN

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 Emmanuel Ogedengbe at ovezebabatunde@gmail.com:

   i. A copy of the Summary Order to Cease and Desist, Revoking Exemptions, and Imposing Restitution and Civil Penalties; DFI Case No. S-252398 (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 30th day of April, 2026.

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

(Notary Seal) ROBIN S. JACOBS NOTARY PUBLIC STATE OF WISCONSIN

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 Chikesirim Adele at chikeadele@gmail.com:

   i. A copy of the Summary Order to Cease and Desist, Revoking Exemptions, and Imposing Restitution and Civil Penalties; DFI Case No. S-252398 (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 30th day of April, 2026.

Robin Jacobs

Notary Public, State of Wisconsin

My commission is permanent.

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ROBIN S. JACOBS
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STATE OF WISCONSIN