Before the
State of Wisconsin
Department of Financial Institutions
Division of Securities

In the Matter of,	Summary Order to Cease and Desist and Revoking Exemptions
Sertexity Labs, Inc.	
Respondent.	DFI Case No. S-252902 (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

Respondent

1. Sertexity Labs, Inc. ("Sertexity"), organized under the laws of Florida effective January 5, 2026, purports to be a digital asset trading platform focusing on cryptocurrency arbitrage to generate passive income. See www.sertexity.com. Its headquarters is reportedly located inside the Miami Tower, 100 SE 2nd Street, Suite 3010, Miami, Florida 33131. However, Suite 3010 is actually the management office of the Miami Tower. Sertexity's registered agent is Evan Hartmore, located at the same address, who is also Sertexity's CEO. Upon information and belief, Evan Hartmore is a fictitious person.

Conduct

Sertexity

2. Sertexity promotes its purported digital asset trading platform through its website, www.sertexity.com. It also has an active profile on Twitter/X and Telegram and briefly had a YouTube channel. Among other things, Sertexity's website claims:
    - 10,000+ active users – Investors from around the world trust Sertexity with their capital every day.

- $20M+ in managed assets – A volume that reflects real trust – not marketing.
- $3M+ paid out monthly – Real withdrawals, processed daily – to real people.

3. Sertexity's homepage describes its arbitrage activity as follows:

Sertexity Arbitrage

Automated system that exploits price differences of the same asset across multiple exchanges, executing trades instantly without user intervention.

- Fully automated system with no trading skills or market experience required
- Profit generated from price gaps, not market direction
- Works in both bullish and bearish market conditions

4. The home page contains additional claims regarding its regulatory compliance and consistent returns:

REGULATED

Built on compliance, backed by law

Sertexity is a fully registered entity operating under FATF, AML, and KYC frameworks - so your capital is always in safe hands.

CONSISTENT

Returns that hold, whatever the market does

Our arbitrage model captures price gaps across exchanges - not market direction. Your yield stays consistent whether prices go up or down.

FAST

Earning starts within a day

Deposit once, and your first payout arrives within 24 hours. Daily settlements run automatically - no manual steps, no waiting.

ACCESSIBLE

Start from $50

No large commitment required. Try the platform with just $50, see how it works, and scale when you're ready.

5. Sertexity's homepage also outlines a four-step process to begin investing with Sertexity:

01
Create your account
Sign up in minutes and get instant access to your personal dashboard.

02
Pick your asset
Browse and select from a wide range of supported cryptocurrencies.

03
Activate arbitrage
Deposit funds and let the AI engine start generating returns automatically.

04
Claim your earnings
Withdraw profits whenever you want - no lock-ups, no delays.

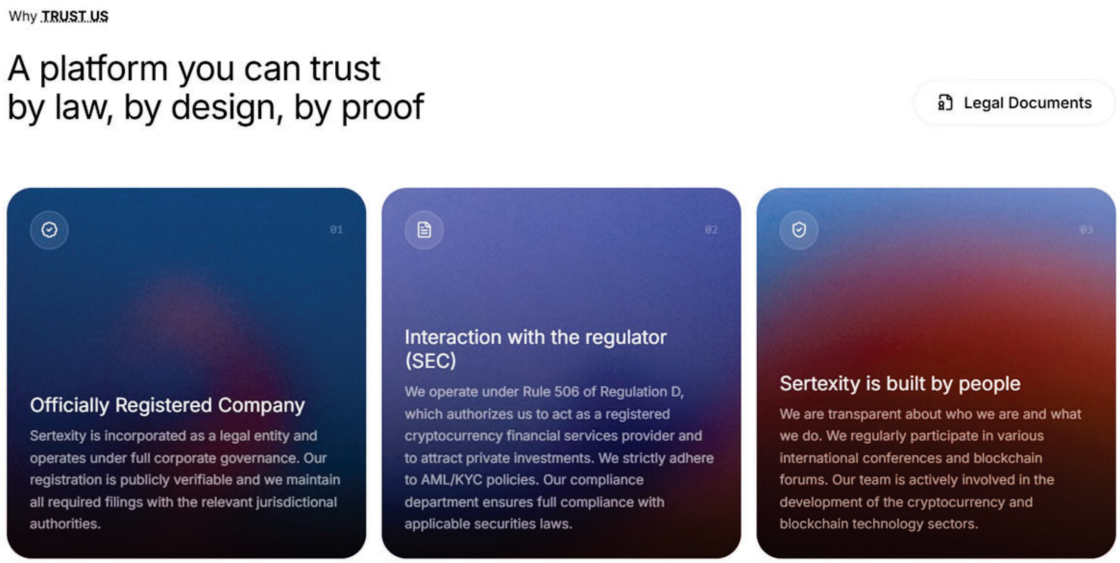
Start now and get first profit within 24 hours!

Create Account

6. The “About Us” page also outlines Sertexity’s purported mission:

> Professional trading desks have exploited crypto price differences across exchanges for years. We built the infrastructure to make that same edge available to any individual – regardless of technical background or trading experience. Our proprietary algorithms monitor hundreds of trading pairs across global exchanges in real time, executing thousands of micro-arbitrage operations daily. Users simply deposit assets and earn – the engine handles everything else.

7. Finally, Sertexity claims to be trustworthy because it is purportedly officially registered, regulated by the SEC, and transparent:



8. However, contrary to the claims in the above infographic, Sertexity’s Reg D 506(c) filing, dated May 11, 2026, does not authorize it to act as a “registered cryptocurrency financial services provider.” Sertexity’s claim (on its “Legal & regulatory documentation” page) that the Form D filing is “accepted by states securities regulator” is also untrue, as states do not accept or register Reg D filings. At best, states receive notice filings of Reg D offerings. Wisconsin has not received any notices of Reg D filings from Sertexity.

9. Moreover, the Form D filing lists Evan Hartmore as the CEO. An online search of Hartmore yields no results, which is unlikely for an individual who leads a global digital asset trading platform. Furthermore, upon information and belief, the “team” presented on the Sertexity website is fictitious – as they have little to no official online presence. This is highly unusual given the claim that Sertexity employees “regularly participate in various international conferences and blockchain forums” and are “actively involved in the development of the cryptocurrency and blockchain technology sectors.”

10. In addition to false regulatory and compliance claims, Sertexity makes numerous unsubstantiated statements on its website which are hallmarks of fraud, including daily profit accrual for investors, a fully automated trading system (“no decisions, no monitoring required”), and automated risk controls for “protecting capital before losses can

compound." In addition, Sertexity filed a deceptive Form D with the SEC, and posted a false address, and false information about its principals and management team on the Sertexity website.

11. Sertexity uses paid media blasts and forums to post fake, identical reviews and to announce purported new technologies, such as its "full-scale liquidity ecosystem model" which allows users to "participate in a shared liquidity pool and earn rewards generated by the ecosystem."[1]

12. In an online chat with a potential Wisconsin investor, Sertexity confirmed that Wisconsin residents can invest with Sertexity on its platform. Sertexity informed the Wisconsin investor that he could not use fiat currency for his Sertexity investments, so he would have to deposit cryptocurrency into a Sertexity wallet address.

13. When asked about registration with the SEC, Sertexity told the investor that its Form D filing allowed the company to "accept investments from qualified private individuals." However, Sertexity did not explain that it could only offer investments to accredited investors and did not ask the Wisconsin investor if he qualified as an accredited investor.

14. Although Sertexity claims to be headquartered in the United States, the registrar for the domain is headquartered and operates in Russia. The domain was registered effective December 12, 2025.

15. The Division contacted Sertexity through their compliance and legal email addresses requesting specific documentation related to their purported investment offerings and requesting interviews with its CEO and COO. Sertexity did not respond to the Division.

16. Upon information and belief, Sertexity intentionally hides the fact that there are no automated trading engines or institutional tools generating the promised daily yields. Sertexity fails to disclose critical, material facts about its operations, including that its executives have no real-world professional history, background, or physical presence. Company headshots are likely generated by AI rather than featuring real employees. Sertexity touts its Form D filing to make investors feel safe but fails to disclose this is a standard notice for a private offering and not a government stamp of approval.

17. Sertexity's investment opportunities are passive investments entirely managed by the business with no control or input from the investors.

18. Sertexity designed the securities investment opportunities so that Sertexity could accept offers to purchase from Wisconsin investors and allow Wisconsin investors to enroll in its passive income investment programs.

19. At no time was Sertexity registered with the Division in any capacity.

[1] https://markets.businessinsider.com/news/stocks/sertexity-launches-its-own-liquidity-ecosystem-1036234915

B. Conclusions of Law

Legal Authority and Jurisdiction

20. 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.

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

22. The purported investments opportunities offered by Respondent to at least one Wisconsin investor, whereby the Respondent would receive funds from the investor to be held on account for his benefit and would be used to engage in profit seeking investment and speculation based on the recommendations and automated trading engines of the Respondent, constitute notes or other evidence of indebtedness as provided in Wis. Stat. § 551.102(28).

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

24. The investment opportunities offered by the Respondent are investment contracts, including as defined by Wis. Stat. § 551.102(28)(d)(1), because the investor invests in a common enterprise with the expectation of profits to be derived through the essential managerial efforts of someone other than the investor, namely the Respondent.

25. The investment opportunities offered by the Respondent also constitute investment contracts pursuant to Wis. Stat. § 551.102(28)(d)(2) because the Respondent induced a Wisconsin investor to furnish funds to the Respondent based on representations from the Respondent by which the investor would reasonably understand that a valuable benefit of some kind over and above the initial funds would accrue to the investor as a result of the operation of the enterprise and with the investor not having the right to exercise practical and actual control over the managerial decisions of the enterprise.

26. The investment contracts offered by the Respondent to a Wisconsin investor were required to be, but were not, registered with the Division.

27. 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.

28. 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.

29. 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.

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

Violations

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

31. The Respondent violated Wis. Stat. § 551.301 by offering and selling unregistered securities in this state to a Wisconsin investor.

32. The Respondent violated Wis. Stat. § 551.501(1) when in connection with the offer, sale, or purchase of a security they employed a device, scheme, or artifice to defraud Wisconsin investors by claiming to have: a digital asset trading platform, a fully automated arbitrage system that generates daily profits, an expert management team, full regulatory compliance with the SEC, and headquarters in Florida – none of which is true. They also omitted statements of material facts including failing to disclose the true principals and founders of Sertexity and its true location and address.

33. The Respondent violated Wis. Stat. § 551.501(2) when in connection with the offer, sale, or purchase of a security they made misrepresentations of material facts to defraud Wisconsin investors by claiming to have: a digital asset trading platform, a fully automated arbitrage system that generates daily profits, an expert management team, full regulatory compliance with the SEC, and headquarters in Florida – none of which is true. They also omitted statements of material facts including failing to disclose the true principals and founders of Sertexity and its true location and address.

34. The Respondent violated Wis. Stat. § 551.501(3) when in connection with the offer, sale, or purchase of a security they engaged in an act, practice, or course of business that operates as a fraud or deceit upon Wisconsin investors by claiming to have: a digital asset trading platform, a fully automated arbitrage system that generates daily profits, an expert management team, full regulatory compliance with the SEC, and headquarters in Florida – none of which is true. They also fail to disclose the true principals and founders of Sertexity, and its true location and address.

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 Sertexity, their agents, servants, officers, employees, successors, affiliates, and every entity and person directly or indirectly controlled or organized by or on behalf of Sertexity, 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 Sertexity, their agents, servants, officers, employees, successors, affiliates, and every entity and person directly or indirectly controlled or organized by or on behalf of Sertexity, 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 Sertexity, their agents, servants, officers, employees, successors, affiliates, and every entity and person directly or indirectly controlled or organized by or on behalf of Sertexity, are hereby revoked, pursuant to Wis. Stat. §§ 551.604(1)(c) and (2).

(d) It is further ordered summarily that Sertexity, 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 Sertexity, are prohibited from violating Wis. Stat. § 551.501 and Wis. Stat. § 551.502 or successor statutes.

(e) It is further ordered summarily that Sertexity, 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 Sertexity, are prohibited from violating Ch. 551 or successor statute that might otherwise apply to any offer or sale of a security of or by Sertexity.

(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. Service of Order

(h) 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.

(i) Please take further 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.

C. Notice of Hearing Rights

(j) Please take further 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.

(k) 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.

(l) 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.

(m) 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).

(n) 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).

(o) Please take further notice that 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.

(p) Please take further notice that failure to provide a copy of this order to prospective investors may be a material misrepresentation in violation of Ch. 551 and this order.

(q) 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 1st day of July, 2026.

Leslie M. Van Buskirk

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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 US mail and email upon Respondent Sertexity Labs, Inc.'s Registered Agent Evan Hartmore at his last known business address of 100 SE 2nd Street, Suite 3010, Miami, Florida 33131 and legal@sertexity.com:

   i. A copy of the Summary Order to Cease and Desist and Revoking Exemptions; DFI Case No. S-252902 (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.

CHRISTOPHER N. GREEN
NOTARY
PUBLIC
STATE OF WISCONSIN

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

Subscribed and sworn to before me

This 2nd day of July, 2026.

Chris N Green
Christopher N. Green
Notary Public, State of Wisconsin
My commission is permanent.

(Notary Seal)