



STATE OF MISSOURI
OFFICE OF SECRETARY OF STATE

IN THE MATTER OF:)
)
GARLAND E. HARRIS; and) Case No. AP-19-02
TROPTIONS CORPORATION,)
)
Respondents.)
)
Serve: Garland E. Harris)
1011 Adams Street)
West Palm Beach, Florida 33407)
)
and)
)
Troptions Corporation)
Garland Harris, Registered Agent)
1011 Adams Street)
West Palm Beach, Florida 33407)

**AMENDED ORDER TO CEASE AND DESIST AND ORDER TO SHOW CAUSE WHY
RESTITUTION, CIVIL PENALTIES, AND COSTS SHOULD NOT BE IMPOSED**

On May 1, 2019, the Enforcement Section of the Missouri Securities Division of the Office of Secretary of State ("Enforcement Section"), through Director of Enforcement Steven C. Reed, submitted Motion for Leave to file an Amended Petition for Order to Cease and Desist and Order to Show Cause Why Restitution, Civil Penalties, and Costs Should Not Be Imposed ("Petition"). After reviewing the Motion for Leave and the proposed Amended Petition and being fully advised in the premises, the Commissioner issues the following order:

The Petition alleges the following facts:

I. SUMMARY OF ALLEGATIONS

Since at least November 20, 2018, Garland E. Harris ("Harris"), Troptions Corporation ("Troptions Corp.") and a now-defunct business called Global Troption Partners Corp., have been operating several websites where they offer and sell TROPTIONS, a cryptocurrency, to Missouri and other investors. The primary website is found at <https://troptionsxchange.com>. Troptions Corp. offers investors the opportunity to purchase TROPTIONS coins, exchange TROPTIONS for

cash, trade them for other cryptocurrencies, or trade them for items of value. The Troptions websites and social media sites do not explain whether TROPTIONS are a product, commodity or security. The sites do not disclose fees or commissions charged to buy and sell the coin. Many statements appear to be materially misleading or likely to deceive the public and seem to be made to inflate the supposed value of TROPTIONS to the investing public.

The Amended Petition identifies several Missouri investors who invested cash, property, services and other items of value in TROPTIONS cryptocurrency based upon representations by the Respondents that TROPTIONS were an investment that would increase in value and produce a profit to TROPTIONS holders because of the efforts of others.

II. ALLEGATIONS OF FACT

A. Respondents and Related Parties

1. Global Trading Partners Corp. was organized in the state of Florida on or around December 2, 2003, with an address at 4809 Northwest 19th Street, Coconut Creek, Florida 33166. Its registered agent was Harris with an address at 4809 Northwest 19th Street, Coconut Creek, Florida 33063. On or around May 9, 2008, Global Trading Partners Corp. changed its name to Global Troption Partners Corp.
2. A check of the Central Registration Depository (“CRD”) indicates that at all times relevant, there was no registration, granted exemption, or notice filing indicating status as a “federal covered security” for any securities issued by Global Trading Partners Corp.
3. Global Troption Partners Corp. was a Florida corporation with a purported address at 1011 Adams Street, West Palm Beach, Florida 33407. Its registered agent was Harris. Global Troption Partners Corp.’s business registration has been inactive since September 25, 2009.
4. A check of the records maintained by the Commissioner indicates that at all times relevant, there was no registration, granted exemption, or notice filing indicating status as a “federal covered security” for any securities issued by Global Troption Partners Corp.
5. Harris is a 61 year-old Florida resident with a last known address at 1011 Adams Street, West Palm Beach, Florida 33407.
6. A check of the records maintained by the Commissioner indicates that at all times relevant, Harris was not registered as a broker-dealer, broker-dealer agent, investment adviser, investment adviser representative, and/or issuer agent.
7. Troptions Corp. is a corporation registered in the state of Florida on March 16, 2017, with a last known address of 1011 Adams Street, West Palm Beach, Florida 33407. Its registered agent is Harris.

8. A check of the records maintained by the Commissioner indicates that at all times relevant, Troptions Corp. was not registered as a broker-dealer, broker-dealer agent, investment adviser, investment adviser representative, and/or issuer agent.
9. Upon information found in the National Futures Association's BASIC database, at all times relevant to this matter, Global Trading Partners Corp., Global Troption Partners Corp., Troptions Corp. and Harris were never registered as any type of commodity merchant or intermediary in connection with futures trading.¹
10. Upon information found in the U.S. Securities and Exchange Commission's EDGAR database, at all times relevant to this matter, Global Trading Partners Corp., Global Troption Partners Corp., Troptions Corp. and Harris were never registered as any type of National Securities Exchange.²
11. Upon information found in the U.S Treasury's Financial Crimes Enforcement Network database, at all times relevant to this matter, Global Trading Partners Corp., Global Troption Partners Corp., Troptions Corp. and Harris were never registered as any type of Money Service Business.³

B. Enforcement Section Investigation

12. Since at least November 20, 2018, Troptions Corp. and Harris have been operating websites accessible to Missouri investors including, but not limited to: troptionsxchange.com; troptionsexchange.com; troptions.io; bartertobillions.com; and social media sites.
13. The Troptions Corp. "LinkedIn" page claims that its headquarters is located in Branson, Missouri.
14. Troptions Corp. purports in an October 16, 2017 press release to have purchased the Liberty Lodge in Branson "valued at \$1.9 million dollars" by "providing the owners with 163,935,000 worth of TROPTIONS which equates to a value of over \$500,000 as a down payment."
15. Troptions Corp. websites' claim it offers educational workshops and weekly calls for holders of TROPTIONS and other cryptocurrency, with seminars held at the Liberty Lodge in Branson, Missouri,⁴ and St. Charles, Missouri.

¹ BASIC is the database where futures commission merchants or intermediaries must register in order to be considered registered with the Commodities Futures Trading Commission.

² EDGAR (Electronic Data Gathering, Analysis, and Retrieval) is an online public database administered by the SEC where individuals and companies can file forms required by federal law.

³ Among other things, a Money Service Business includes a currency dealer or exchanger. See 31 CFR 1010.100 (ff) for a complete definition of a Money Service Business.

⁴ The only seminar in Branson reportedly took place at Liberty Lodge on June 21, 2018.

16. Troptions Corp. purports to have “sponsored the American Arena League as well as its 13 member teams for the sum of two million fifty thousand dollars (\$2,050,000.00) in cryptocurrency for the 2018 season”.
17. Troptions Corp. sponsors NASCAR truck racing with TROPTIONS.
18. Troptions Corp. claims the following, among others items, were purchased using TROPTIONS cryptocurrency:
 - a. Metro Capital for \$26 million in TROPTIONS;
 - b. NextG Exempt Telecommunications for \$25 million in TROPTIONS;
 - c. Singk Technology Company/Invested \$135 million in TROPTIONS; and
 - d. Insurance Company/\$500 million in TROPTIONS.
19. The websites claim Troptions Corp. has “bought over 1.5 Billion dollars in assets.”
20. Among other things, Troptions purports to be a cryptocurrency that has been in existence for at least fourteen years.
21. Users of the websites can purchase TROPTIONS coins, exchange TROPTIONS coins for cash, trade TROPTIONS coins for other cryptocurrencies, or trade TROPTIONS for items of value.
22. The history of TROPTIONS is described in its “Whitepaper”, authored by Harris, and in the following posts on their websites:
 - a. “In 2003, Garland E. Harris founded the concept of ‘TROPTION’ in a business plan for a company called Global Trading Partners Corp. The word ‘TROPTION’ was the simple combination of two words-‘Trade’ and ‘Option.’”;
 - b. “In 2004, Global Trading Partners Corp. used the previously developed business plan to write and file a private placement memorandum under Rule 504 Regulation D with the Securities and Exchange Commission. TROPTION, renamed TROPTIONS for blockchain purposes, has officially existed as a digital currency, since that SEC filing in 12/27/2004. Global Trading Partners Corp. was renamed Global Troption Partners Corp. in 2008.”;
 - c. “If TROPTIONS are a security, they have certainly passed the required one year waiting period to be freely traded.”; and
 - d. “TROPTIONS found its niche as a financial instrument that helped dozens of small private companies raise capital and in some cases go public with millions of dollars in public funding.”

23. A review of Troptions Corp.'s various websites and social media sites on or around December 5, 2018, revealed numerous statements that are materially misleading or otherwise likely to deceive the public including, but not limited to, the following:
- a. "Did you know crypto currency will create more millionaires and billionaires then [*sic*] any product or service since the beginning of time?";
 - b. "Troptions the coin of Kings and Queens where billionaires and millionaires are being created daily";
 - c. "Troptions continues to go up in value each day";
 - d. "Troptions currency should be purchased over other currencies";
 - e. "Troptions gained a 13 percent appreciation in 9 days";
 - f. "Troptions projects to be worth between 2-20 times that in a year";
 - g. "As an asset TROPTIONS have value, hold value, and can be used for savings of value";
 - h. "Troptions is a great value and price and it is not subject to wild swings"; and
 - i. "Troptions is like holding other assets, it can preserve value and purchasing power in a form that is immune from any nation's efforts to control it."
24. These statements are misleading because:
- a. other cryptocurrencies have decreased in value;
 - b. government regulations can affect the value of cryptocurrency; and
 - c. competition among different cryptocurrencies can affect the value of TROPTIONS cryptocurrency.
25. The troptionsxchange.com website omitted to disclose material information including, but not limited to, the following:
- a. specific information to support the assertion that TROPTIONS cryptocurrency will never decrease in value;
 - b. specific information regarding how TROPTIONS cryptocurrency is valued;
 - c. that Global Troption Partners Corp.'s Florida business registration has not been active since September 25, 2009;

- d. that although Global Trading Partners Corp. did file an exemption from securities registration with the SEC in 2004, no filings were made after its name was changed to Global Troption Partners Corp. in 2008;
- e. specific information about Troptions Corp.'s principals, including past business experience;
- f. specific information about Troptions Corp.'s past and current financial history; and
- g. fees or commissions associated with buying, selling, or trading TROPTIONS cryptocurrency.

C. Missouri Investors

26. Among those falling victim to Respondents' schemes to convince people to purchase Troptions cryptocurrency are the following:

Missouri Resident 1 ("MR1")

- 27. A 39-year-old Kimberling City, Missouri, resident ("MR1") learned about TROPTIONS when interviewing for a job with Respondents at Liberty Lodge in Branson, Missouri.
- 28. Respondents persuaded MR1 to work as an assistant to Respondent Harris on or about April 6, 2018.
- 29. Harris promised to pay MR1 a salary of 50% U.S. Dollars and 50% Troptions cryptocurrency for a total of \$1,000 per week.
- 30. As part of his inducement to hire MR1 and accept the investment in Troptions cryptocurrency, Harris claimed:
 - a. TROPTIONS would grow in value and by the end of the year MR1 would be a millionaire;
 - b. TROPTIONS, more specifically, XTROPTIONS.GOLD, TROPTIONS.GOLD, AND XTROPTIONS.AUS would be worth 100 times what they are now;
 - c. Harris's last assistant was making \$100,000 per year after 3 months and Harris would pass on raises quickly as TROPTIONS keeps going up in value;
 - d. Harris was doing deals for millions of dollars with TROPTIONS cryptocurrency including buying a 2.5 million dollar home, buying hotels, and sponsoring a professional Atlanta football team.
- 31. Harris further induced MR1 to stay on as his assistant and maintain MR1's investment with promises of:

- a. Getting a TROPTIONS credit card to allow TROPTIONS holders to go to any ATM and withdraw cash for their TROPTIONS;
 - b. A hedge fund buying in to be part of Troptions Corp. and allow holders to liquidate their TROPTIONS;
 - c. An exchange established wherein TROPTIONS could be used and exchanged for other cryptocurrencies like Bitcoin and Ethereum and cash.
32. MR1 has never been able to redeem the one-half of her salary paid in TROPTIONS and is currently owed \$34,500 in salary that was paid as an investment in TROPTIONS.

Missouri Resident 2 (“MR2”)

33. A Branson, Missouri, hotel owner, “MR2” met Harris sometime in October 2017.
34. Harris told MR2 that TROPTIONS was a cryptocurrency and guaranteed TROPTIONS would be soon be on an exchange for trading.
35. Harris assured MR2 that if MR2 invested in TROPTIONS he would make millions, that MR2 was guaranteed to be paid, and MR2 could cash out anytime.
36. Based on Harris’s representations, in November 2017, MR2 entered into an agreement with Harris to lease three hotels in the Branson area to Harris for cash and TROPTIONS cryptocurrency.
37. By the spring of 2018, Harris stopped making lease payments and quit paying ordinary expenses for the hotels leading MR2 to terminate the leases and regain possession of the hotels.
38. Harris made no mention to MR2 that TROPTIONS was a “barter coin” that could be used to trade for goods and services. Instead, Harris referred to Troptions as the “King of Coins” and led MR2 to believe TROPTIONS were an investment.
39. MR2 states that he has a wallet with TROPTIONS cryptocurrency but has never been able to exchange his TROPTIONS for cash as promised by Harris.
40. To date, MR2 is deprived of about \$200,000 by Harris’ efforts to deceive MR2 into accepting TROPTIONS cryptocurrency as lease payments.

Missouri Resident 3 (“MR3”)

41. A 63 year-old St. Louis, Missouri, resident (“MR3”) met Harris at a meeting in O’Fallon, Missouri, in the fall of 2018.

42. At the meeting in O'Fallon, Harris presented a seminar on cryptocurrency where Harris represented that TROPTIONS is a coin that had monetary value.
43. Harris stated at the presentation that people should buy as much TROPTIONS cryptocurrency as you can as fast as you can because the investment was going to be big.
44. Harris used Bitcoin as an example of the tremendous growth that TROPTIONS was capable of.
45. Harris promised that MR3 would never lose the initial cash investment and that MR3 could cash in TROPTIONS at any time.
46. MR3 invested \$3,435 on or about October 20, 2018, into TROPTIONS with Harris and Troptions Corp.
47. MR3 has made multiple requests for the return of the initial investment and has been unable to obtain a return of the investment.

Missouri Resident 4 ("MR4")

48. A 64 year-old resident of St. Charles, Missouri, ("MR4") was introduced to Troptions Corp. and Harris in November, 2018.
49. On November 23, 2018, MR4 attended a meeting to listen to the CEO and founder of Troptions Corp., Garland E. Harris, present TROPTIONS and talk about cryptocurrency.
50. Harris handed out website information and a "White Paper" on how TROPTIONS cryptocurrency came about.
51. MR4 attended another seminar by Harris in December 2018.
52. Harris stated that TROPTIONS cryptocurrency was backed by gold and property and was on the Bitcoin blockchain.
53. Harris and others on his behalf stated that you can create a free wallet and store your TROPTIONS cryptocurrency there.
54. Harris claimed TROPTIONS would continue to increase in value based on proof of use and deals done using TROPTIONS.
55. MR4 invested \$7,300 on or about November 22, 2018, in TROPTIONS cryptocurrency and is unable to obtain a return of his investment.

Missouri Resident 5 (“MR5”)

- 56. A 58 year-old resident of O’Fallon, Missouri, (“MR5”) owns a barter trade company called Absolute Barter Company in Weldon, Spring, Missouri.
- 57. Harris signed up Liberty Lodge, Troptions Corp., and himself as barter members.
- 58. Harris explained that TROPTIONS was a cryptocurrency like Bitcoin, that Troptions Corp. was not a barter company, but that you could barter through Harris’s cryptocurrency network using TROPTIONS.
- 59. Harris told MR5 that he owned hotels and homes in Branson and Florida.
- 60. Harris represented a return of tens of thousands of dollars with an investment in TROPTIONS cryptocurrency.
- 61. Harris promised MR5 that TROPTIONS could be cashed in for money at any time.
- 62. MR5 invested \$4,786.81 on December 15, 2018, into Troptions cryptocurrency and has been unable to get the investment back or any return thereon.

Missouri Resident 6 (“MR6”)

- 63. A 61 year- old resident of Lake St. Louis, Missouri, (“MR6”) learned about TROPTIONS while attending a meeting in St. Charles in the winter of 2018 where TROPTIONS cryptocurrency was presented.
- 64. The presenters at the meeting represented that investing in TROPTIONS carried no risk and that MR6 could get the initial investment back at any time.
- 65. No information was provided on the financial state of Troptions Corp. or other entity.
- 66. MR6 invested \$200 by buying TROPTIONS but has been unable to obtain a return of the investment.

D. Other Investors

Florida Resident (“FR”)

- 67. A Florida resident (“FR”) was an employee of Respondents from January 2018 to January 2019.
- 68. Harris made an agreement to pay FR for web development and IT services from January 2018 to January 2019 in TROPTIONS cryptocurrency.

- 69. Harris led FR to believe that FR could exchange TROPTIONS for cash or use them to purchase goods and services.
- 70. Harris claimed TROPTIONS would increase in value like Bitcoin.
- 71. Harris represented that the TROPTIONS paid to FR have value like Bitcoin and are worth the value of services performed by FR.
- 72. Harris paid FR in TROPTIONS, which FR claims have no value and cannot be monetized.
- 73. FR claims the value of his services from January 2018 to January 2019 is \$80,000 but FR has not received any payments.

More Investors to be Identified

- 74. The Enforcement Section of the Missouri Securities Division believes, based upon its investigation to date, that there are many more investors in TROPTIONS cryptocurrency as identified by “wallets” held by individuals and entities, the identity of whom is known by Respondents.

III. COMMISSIONER’S DETERMINATION AND FINDING

Multiple Violations of Offering and Selling Unregistered, Non-Exempt Securities

- 75. **THE COMMISSIONER DETERMINES** that Respondents offered and/or sold unregistered, non-exempt securities, by, among other things:
 - a. Through troptionsxchange.com and other websites, Respondents offered and sold investment contracts, in that:
 - i. investors invested funds in a common enterprise with Respondents;
 - ii. investors’ funds were to be used by Respondents to sell the investors TROPTIONS cryptocurrency;
 - iii. investors expected a profit from the efforts of Respondents and not from investors’ own efforts; and
 - iv. investors’ expected profits were interwoven with and dependent upon the efforts of Respondents.
- 76. The purchasers of TROPTIONS cryptocurrency invested money with a reasonable expectation of profits, including through the increased value of their investments in secondary trading, based on the managerial efforts of others.⁵

⁵ See *SEC v. Edwards*, 540 U.S. 389, 393 (2004); *SEC v. W.J. Howey Co.*, 328 U.S. 293, 301 (1946)

77. At all times relevant to this matter, there was no registration, granted exemption, or notice filing indicating status as a “federal covered security” for the securities offered and sold by Respondents.
78. Respondents, through troptionsxchange.com, offered and sold securities in Missouri without these securities being (1) a federal covered security, (2) exempt from registration under Sections 409.2-201 or 409.2-203,⁶ or (3) registered under the Missouri Securities Act of 2003.
79. Respondents’ conduct in violation of Section 409.3-301 constitutes an illegal act, practice, or course of business and such conduct is, therefore, subject to the Commissioner’s authority under Section 409.6-604.

Multiple Violations of Transacting Business as an Unregistered Agent

80. **THE COMMISSIONER FURTHER DETERMINES** that Respondents transacted business as unregistered agents in the state of Missouri.
81. Respondents offered and/or sold securities to investors in Missouri.
82. These activities constitute transacting business as an agent in the state of Missouri under Section 409.1-102(1).
83. At all times relevant to this matter, Respondents were not registered as agents in the state of Missouri.
84. Respondents offered and/or sold securities to investors in Missouri without being registered or exempt from registration as an agent in violation of Section 409.4-402(a), and engaged in an illegal act, practice, or course of business, and such conduct is, therefore, subject to the Commissioner’s authority under Section 409.6-604.

Multiple Violations of Making an Untrue Statement, Omitting to State Material Facts or Engaging in An Act, Practice, or Course of Business that Would Operate as a Fraud or Deceit Upon Another Person in Connection with the Offer or Sale of a Security

85. **THE COMMISSIONER FURTHER DETERMINES** that in connection with the offer, sale or purchase of a security as described above, Respondents, through troptionsxchange.com, and other websites and social media sites, made untrue statements of material fact or omitted to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading, including, but not limited to, the following:
- a. claiming that TROPTIONS cryptocurrency will never decrease in value;

⁶ Unless otherwise noted, all statutory references are to the 2016 Revised Statutes of Missouri.

- b. specific information to support the assertion that TROPTIONS cryptocurrency will never decrease in value;
 - c. specific information regarding how TROPTIONS cryptocurrency is valued;
 - d. that Global Troption Partners Corp.'s Florida business registration has not been active since September 25, 2009;
 - e. that although Global Trading Partners Corp. did file an exemption from securities registration with the SEC in 2004, no filings was made after its name was changed to Global Troption Partners Corp. in 2008;
 - f. specific information about Troptions Corp.'s principals including past business experience;
 - g. specific information about Troption Corp.'s past and current financial history; and
 - h. omitting to disclose fees or commissions associated with the purchase, sale, or trading of TROPTIONS cryptocurrency;
 - i. claiming that an investment in TROPTIONS could be monetized or cashed out at any time;
 - j. asserting that there was no risk involved in investing in TROPTIONS;
 - k. stating that TROPTIONS will increase in value, that TROPTIONS were backed by gold and property, and that holders will become millionaires.
86. **THE COMMISSIONER FURTHER DETERMINES** that in connection with the offer, sale or purchase of a security as described above, Respondents, through troptionsxchange.com, and other websites and social media, made an untrue statement of material fact, omitted to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading or engaged in an act, practice, or course of business that would operate as a fraud or deceit upon another person in violation of Section 409.5-501, and engaged in an illegal act, practice, or course of business, and such conduct is, therefore, subject to the Commissioner's authority under Section 409.6-604.
87. An order is in the public interest and is consistent with the purposes of the Missouri Securities Act of 2003. *See* Section 409.6-605(b).

IV. ORDER

NOW, THEREFORE, it is hereby ordered that Respondents, their agents, employees and servants, and all other persons participating in or about to participate in the above-described

violations with knowledge of this order be prohibited from violating or materially aiding in any violation of:

- A. Section 409.3-301, by offering or selling any securities as defined by Section 409.1-102(28) in the State of Missouri unless those securities are registered with the Securities Division of the Office of the Secretary of State in accordance with the provisions of Section 409.3-301;
- B. Section 409.4-402(a), by transacting business as an unregistered agent; and
- C. Section 409.5-501, by, in connection with the offer or sale of securities, making an untrue statement of a material fact or omitting to state a material fact necessary in order to make the statement made, in light of the circumstances under which it is made, not misleading or engaging in an act, practice, or course of business that operates or would operate as a fraud or deceit upon another person.

V. STATEMENT

Pursuant to Section 409.6-604, the Commissioner hereby states that he will determine whether to grant the Enforcement Section's requests for:

- A. \$15,000 civil penalty against each Respondent for more than one violation of Section 409.3-301 when at least one of these violations was committed against an elderly person;
- B. \$15,000 civil penalty against each Respondent for more than one violation of Section 409.4-402(a) when at least one of these violations was committed against an elderly person;
- C. \$15,000 civil penalty against each Respondent for more than one violation of Section 409.5-501 when at least one of these violations was committed against an elderly person;
- D. an order against Respondents to pay restitution for any loss, including the amount of any actual damages that may have been caused by the conduct, and interest at the rate of 8% per year from the date of the violation causing the loss or disgorge any profits arising from the violation of Sections 409.4-402 and 409.5-501, in the final order, unless Respondents request a hearing and show cause why this restitution or disgorgement should not be imposed;
- E. an order that rescission of the contracts for purchase of TROPTIONS is appropriate and that the purchasers recover the consideration paid for the security and interest at eight percent per annum from the date of purchase; and
- F. an order against Respondents to pay the costs of the investigation in this proceeding, after a review of evidence of the amount submitted by the Enforcement Section.

SO ORDERED:

WITNESS MY HAND AND OFFICIAL SEAL OF MY OFFICE AT JEFFERSON CITY,
MISSOURI THIS 7th DAY OF MAY, 2019.



JOHN R. ASHCROFT
SECRETARY OF STATE



DAVID M. MINNICK
COMMISSIONER OF SECURITIES



STATE OF MISSOURI
OFFICE OF SECRETARY OF STATE

IN THE MATTER OF:)
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GARLAND E. HARRIS; and) Case No. AP-19-02
TROPTIONS CORPORATION,)
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Respondents.)
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Serve: Garland E. Harris)
1011 Adams Street)
West Palm Beach, Florida 33407)
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and)
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Troptions Corporation)
Garland Harris, Registered Agent)
1011 Adams Street)
West Palm Beach, Florida 33407)

NOTICE

TO: Respondents and any unnamed representatives aggrieved by this Amended Order:

You may request a hearing in this matter within thirty (30) days of the receipt of this Order pursuant to Section 409.6-604(b), RSMo 2016, and 15 CSR 30-55.020. Any request for a hearing before the Commissioner must contain:

- a. a brief statement of the facts;
- b. a summary of the factual and legal issues involved;
- c. a request for relief;
- d. suggestions in support of the relief sought, including the relevant statutes;
- e. the name of the party requesting the hearing; and
- f. the name of the attorney representing the party, if any.

Within fifteen (15) days after receipt of a request in a record from a person or persons subject to this order, the Commissioner will schedule this matter for a hearing.

A request for a hearing must be mailed or delivered, in writing, to:

David M. Minnick, Commissioner of Securities
Office of the Secretary of State, Missouri
600 West Main Street, Room 229
Jefferson City, Missouri, 65102

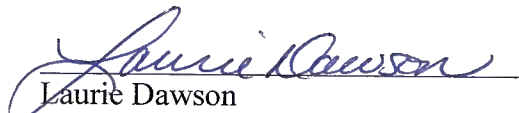
CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of May, 2019, a copy of the foregoing Amended Order to Cease and Desist and Order to Show Cause Why Restitution, Civil Penalties, and Costs Should Not Be Imposed in the above styled case was **mailed by certified U.S. mail to:**

Garland E. Harris
1011 Adams Street
West Palm Beach, Florida 33407

Troptions Corporation
Garland E. Harris, Registered Agent
1011 Adams Street
West Palm Beach, Florida 33407

Todd Zuckerbrod
Attorney at Law
40 SE 5th Street
Suite 400
Boca Raton, FL 33432
tz@tzbrokerlaw.com


Laurie Dawson
Securities Office Manager