

NOW THEREFORE, the parties stipulate, and the Commissioner makes findings and conclusions as follows:

FINDINGS OF FACT

1. Respondent is a firm with a principal place of business at 325 9th Street, San Francisco, California.
2. Respondent sells and/or has sold securities in Vermont that are subject to the notice filing requirements in 9 V.S.A. § 5302 and Rule S-2016-01, § 4-3.
3. On July 23, 2018, Respondent made a first sale to a Vermont resident.
4. On January 7, 2019, Respondent delivered to the Department via EFD a complete notice filing which included a Form D and filing fee of \$600. This filing arrived 153 days late.

CONCLUSIONS OF LAW

5. The securities offered and sold by Respondent were federal covered securities under 15 U.S.C. § 77r(b)(4)(F) and subject to the filing requirements of Rule S-2016-01, § 4-3(b).
6. Respondent violated Rule S-2016-01, § 4-3(b) by selling federal covered securities in Vermont without notice filing a Form D and paying the required fee within 15 days of the first sale.
7. Respondent is subject to a civil penalty under 9 V.S.A. § 5604 for violating Rule S-2016-01, § 4-3(b).

ORDER

On the basis of the Findings of Fact, Conclusions of Law and Respondent's consent to the entry of this Order, the Commissioner ORDERS:

8. Respondent shall pay an administrative penalty in the amount of \$500.00 to the Vermont Department of Financial Regulation.

BY ORDER OF THE COMMISSIONER

Entered at Montpelier, Vermont, this 2nd day of October, 2019



MICHAEL S. PIECIAK, Commissioner
Vermont Department of Financial Regulation

AGREED AND ACCEPTED BY:

Authorized agent for Respondent, TrustToken, Inc.:

Printed Name: Michael Bland

Title: Corporate Counsel

Signature: 

Date: 9/16/19