

STATE OF NEW JERSEY
BUREAU OF SECURITIES
P.O. Box 47029
Newark, New Jersey 07101
(973) 504-3600

IN THE MATTER OF:

Bulk Investments,

Respondent.

**SUMMARY CEASE
AND DESIST ORDER**

Pursuant to the authority granted to Christopher W. Gerold, Chief of the New Jersey Bureau of Securities (“Bureau Chief”), under the Uniform Securities Law (1997), N.J.S.A. 49:3-47 to -89 (“Securities Law”) and certain regulations thereunder, and based upon documents and information obtained during the investigation by the New Jersey Bureau of Securities (“Bureau”), the Bureau Chief hereby finds that there is good cause and it is in the public interest to enter this Summary Cease and Desist Order (“Order”) against Bulk Investments (“Bulk Investments”).

The Bureau Chief makes the following findings of fact and conclusions of law:

FINDINGS OF FACT

A. The Respondent

1. Bulk Investments conducts its business on the internet, principally by means of a website accessible at <https://www.bulkinvestmentscorp.com/> (“Bulk Investments’ Website”).

2. Bulk Investments holds itself out as an on-line trading system offering 24-hour access, multi-language support and a broad array of investment products and services backed by knowledgeable and experienced financial professionals. Bulk Investments markets itself to “every level traders [sic] or investors.” Bulk Investments purports to be located in the Netherlands at “Hagelaarweg 148, Best, Noord-Brabant.”

3. Bulk Investments is not and has never been registered in any capacity with the Bureau.

B. The Bulk Investments Securities

4. Bulk Investments offers several services including, cryptocurrency investments, loans, a hedge fund marketplace, and real estate investing. According to Bulk Investments' Website, "Bulk Investments focus [sic] on the usability of crypto and invest [sic] in real estate and stocks and makes it easy to users who wants to get started with investments get in easily."

5. Bulk Investments' Website offers six different investment options (collectively, the Bulk Investments Plans). Bulk Investments publishes the following graphics on the Bulk Investments' Website to demonstrate the terms:

Plan Name	Return	Term	Minimum	Maximum	Daily Returns	Referral Commission
Newbie Plan	10%	14 days	\$ 100	\$ 9999	-0.71%	5%
Silver Plan	25%	30 days	\$ 10000	\$ 49999	-0.83%	10%
Platinum Plan	35%	30 days	\$ 50000	\$ 99999	-1.16%	15%
Bulk Plan	39%	30 days	\$ 100000	\$ 999999	-1.30%	20%
NFP Plan	100%	3 days	\$ 30000	\$ 300000	-33.30%	30%
Retirement Plan	15%	30 days	\$ 500	\$ 500000	-0.50%	30%

6. Bulk Investments' Website offers little information regarding each service. Bulk Investments' Website states it "offers everyone who wishes to have stable extra earnings in the long term to invest in our Company.ce [sic] you make a deposit, you will start getting daily interest and continue earning until your deposit term expires" and promises "after that you can either withdraw your deposit or invest it again, for another term, to continue getting daily interest." Bulk Investments' Website also states "the money which we attract through our website will be used to increase our current assets and consequently, increase our profit to share it with you as our investor."

7. Bulk Investments offers a three-step process to start: i) create an account, ii) deposit funds and iii) invest and earn profits.

8. As described on Bulk Investments' Website, Bulk Investment purportedly charges a 20% administrative fee for a "contractual withdrawal" from its Registration Agreement "within 14 days from the date of [T]ransferring funds of the account [sic], without giving any reason" but does not disclose any fees when an investor attempts to withdraw funds beyond 14 days from the registration agreement.

9. The Bulk Investments Plans are securities as defined by N.J.S.A. 49:3-49(m).

10. Bulk Investments offers the Bulk Investments Plans to the general public, including New Jersey residents.

11. The Bulk Investments Plans are neither registered with the Bureau, nor "federally covered," nor exempt from registration, as required by the Securities Law.

12. Bulk Investments is not registered with the Bureau as a broker-dealer or in any capacity.

C. Bulk Investments' Website

13. Bulk Investments' Website does not provide any information regarding Bulk Investments' officers, directors, or management team, and does not indicate the credentials, qualifications or experience of these individuals.

14. Bulk Investments' Website merely states, “[w]e are a group of the skilled financial professionals having a high level of knowledge and long term practice in the investment field.”

15. Bulk Investments' Website states: “Bulk Investments is a legally registered company in the field of fiduciary management and long-term investments.” However, searches of the United States Securities and Exchange Commission’s Edgar database and of the Netherland’s Business.gov.nl database failed to identify any results for Bulk Investments.

D. Omissions of Material Facts to Potential Investors by Bulk Investments in the Offer of the Bulk Investments' Plans

16. In connection with the offer of securities on Bulk Investments' Website, Bulk Investments' omissions of material fact includes:

- a. The identity of its principals and management;
- b. How Bulk Investments invests investors' money;
- c. The company's financial statements, including its assets, liabilities, and profitability;
- d. The risks of Bulk Investments' Plans;
- e. The organization or regulator that registered Bulk Investments as a “legally registered company in the field of fiduciary management and long-term investments;”

- f. Additional fees that will be charged for the withdrawal of funds after the 14 day registration; and
- g. That Bulk Investments' Plans are not registered with the Bureau as required by the Securities Law.

E. New Jersey Investor

17. At least one New Jersey resident invested with Bulk Investments (the "New Jersey Investor"). The New Jersey Investor purchased Bitcoin from Coinmama, a separate business on the internet, accessible at www.coinmama.com, and invested it in Bulk Investments' NFP Plan which at the time was found on a prior iteration of the Bulk Investments Website located at www.bulkinvestments.com.

18. The New Jersey Investor sent Bitcoin worth \$74,900 to Bulk Investments for the NFP Plan between July 8, 2020 and January 14, 2021.

19. In or about November 2020, Bulk Investments emailed the New Jersey Investor stating that its original web address www.bulkinvestments.com was hacked and changed to www.bulkinvestmentscorp.com.

20. Bulk Investments told the New Jersey Investor that in order to withdraw the funds, an additional 10% tax fee of \$59,812 would be required to be paid.

21. Despite requests, the New Jersey Investor has not received any of his principal or profits back from Bulk Investments.

CONCLUSIONS OF LAW

22. Bulk Investments' Plans are "securities" as defined by N.J.S.A. 49:3-49(m).

23. Bulk Investments is offering securities that are neither registered with the Bureau, nor "federally covered," nor exempt from registration, in violation of N.J.S.A. 49:3-60.

24. Bulk Investments is effecting or attempting to effect transactions in securities for the accounts of others without registration as a broker-dealer in violation of N.J.S.A. 49:3-56.

25. In connection with the offer of the Bulk Investments' Plans, Bulk Investments is omitting to state material facts necessary in order to make the statements made in light of the circumstances under which they were made, not misleading to investors, in violation of N.J.S.A. 49:3-52(b).

26. N.J.S.A. 49:3-67 empowers the Bureau Chief to issue orders that are reasonably necessary to carry out the provisions of the Law.

27. N.J.S.A. 49:3-69(a)(1) empowers the Bureau Chief to issue a cease and desist order against persons engaged in prohibited activities, directing them to cease and desist from further illegal activity or doing acts in furtherance thereof.

28. Bulk Investments violations are continuous and ongoing, therefore making a cease and desist order in the public interest and an appropriate remedy.

ORDER

THEREFORE, it is on this 27th day of October 2021, **ORDERED** that:

1. Bulk Investments and any person, employee, officer, director, entity, agent, representative, or independent contractor under Bulk Investments' direction or control immediately **CEASE AND DESIST** from:

- a. offering for sale any security in New Jersey until the security is registered with the Bureau, is offered for sale pursuant to an exemption from registration under the Securities Law, or is a federally covered security;
- b. acting as broker-dealers or agents in New Jersey until each is registered with the Bureau or are acting pursuant to an exemption from registration under the Securities Law;

- c. making material misstatements of fact, or omitting to state material facts necessary in order to make the statements made, in light of the circumstances under which they are made, not misleading in connection with its offer and/or sale of securities in New Jersey; and
 - d. violating any other provisions of the Securities Law and any rules promulgated thereunder for the sale of any security in New Jersey.
2. All exemptions contained in N.J.S.A. 49:3-50 subsection (a) paragraph 9, 10, and 11 and subsection (b) are hereby **DENIED** as to Bulk Investments.
3. All exemptions to the registration requirements provided by N.J.S.A. 49:3-56(b), N.J.S.A. 49:3-56(c) and N.J.S.A. 49:3-56(g) are hereby **DENIED** as to Bulk Investments.

Christopher W. Gerold

Christopher W. Gerold
Chief, New Jersey Bureau of Securities

NOTICE OF RIGHT TO HEARING

Pursuant to N.J.S.A. 49:3-69(a)(1)(i) the Bureau Chief shall entertain on no less than three days' notice a written application to lift the Order to Cease and Desist on written application of the person subject thereto and in connection therewith may, but need not, hold a hearing and hear testimony, but shall provide to the person subject thereto a written statement of the reasons for the Order to Cease and Desist.

Pursuant to N.J.S.A. 49:3-69(a)(1)(ii), upon service of notice of the Order to Cease and Desist issued by the Bureau Chief, the person subject thereto shall have up to 15 days to respond to the Bureau in the form of a written answer and written request for a hearing. The Bureau Chief shall, within five days of receiving the answer and request for a hearing, either transmit the matter to the Office of Administrative Law for a hearing or schedule a hearing at the Bureau of Securities.

Orders issued pursuant to N.J.S.A. 49:3-69 shall be subject to an application to vacate upon 10 days' notice, and a preliminary hearing on the Order shall be held in any event within 20 days after it is requested, and the filing of a motion to vacate the Order shall toll the time for filing an answer and written request for a hearing.

Pursuant to N.J.S.A. 49:3-69(a)(1)(iii), if any person subject to the Order fails to respond by filing a written answer and written request for a hearing with the Bureau or moving to vacate the order within the 15 day prescribed period, that person shall have waived the opportunity to be heard. The Order will be a Final Order and shall remain in effect until modified or vacated.

NOTICE OF OTHER ENFORCEMENT REMEDIES

You are advised that the Uniform Securities Law provides several enforcement remedies, which are available to be exercised by the Bureau Chief, either alone or in combination. These remedies include, in addition to this action, the right to seek and obtain injunctive and ancillary relief in a civil enforcement action, N.J.S.A. 49:3-69, and the right to seek and obtain civil penalties in an administrative or civil action, N.J.S.A. 49:3-70.1.

You are further advised that the entry of the relief requested does not preclude the Bureau Chief from seeking and obtaining other enforcement remedies against you in connection with the claims made against you in this action.