

**STATE OF ILLINOIS
SECRETARY OF STATE
SECURITIES DEPARTMENT**

IN THE MATTER OF:)
)
)
JKONSULTING, INC., its managers, officers, affiliates,)
subsidaries, representatives, successors, and assigns, and;) **File No. 1900508**
)
KEVIN ADEREMI, an individual, and;)
)

TEMPORARY ORDER OF PROHIBITION

TO THE RESPONDENTS:

JKonsulting, Inc.
4512 Jefferson Drive
Richton Park, IL 60471

Kevin Aderemi
8828 South Mozart Avenue
Evergreen Park, IL 60805

WHEREAS, pursuant to the authority granted under Section 11.F of the Illinois Securities Law of 1953 [815 ILCS 5] (the "Act"), the Secretary of State has determined that the offer or sale of securities and/or the engagement in the business of investment adviser in or from the State of Illinois by JKonsulting, Inc. and Kevin Aderemi are subject to a Temporary Order of Prohibition.

COUNT I

FRAUD

1. Respondent JKonsulting, Inc. ("JKonsulting") is an Illinois corporation which is now listed as not in good standing and has a last known business address of 4512 Jefferson Drive, Richton Park, IL 60471.
2. Respondent Kevin Aderemi ("Aderemi") is the President of Respondent JKonsulting, and has the last known address of 8828 South Mozart Avenue, Evergreen Park, IL 60805.
3. In September 2017, Investor A, an Illinois resident, was solicited by Respondent Aderemi to invest the sum of \$2,000 in Respondent JKonsulting.

Temporary Order of Prohibition
-1900508-

4. Investor A signed a contract with Respondent JKonsulting whereby, Respondent JKonsulting holding itself out as a brokerage firm, would use funds received from investors, to invest in biotech, technology, oil, minerals, currency, and social media.
5. Respondent JKonsulting has not registered and has never been registered as a broker dealer in the State of Illinois, nor has Respondent Aderemi been registered or has ever been registered as a securities salesperson in the State of Illinois.
6. Respondent JKonsulting guaranteed the investment stating: "The deposited money you enter into our fund will be your safety deposit and will be insured by JKonsulting as your minimal payout if you ever choose to leave our brokerage. This means regardless of how bad our firm is doing you will never lose anything you originally put in."
7. Investor A signed the contract with Respondents JKonsulting and Aderemi on September 29, 2017 and transferred \$2,000 to Respondent JKonsulting's account.
8. The investment in Respondent JKonsulting constitutes the offer or sale of a security as those terms are defined in Sections 2.1, 2.5, and 2.5a of the Illinois Securities Law of 1953 [815 ILCS 5/1 *et. seq.*] (the "Act").
9. Investor A received several updates in 2017 from Respondents regarding his investment, including one update which informed him that he had made \$300 from his original investment.
10. During the years 2018 and 2019, Investor A has made several attempts to take out his original \$2,000 investment from Respondent JKonsulting. He has attempted to call, text, email, and contact on social media Respondent Aderemi requesting the return of his money.
11. Respondent JKonsulting maintains a website at jkonsultinginc.com. Respondents continue to offer investments in cryptocurrency which are insured up to \$2,000. Respondents claim that you will always be able to get back your initial investment up to \$2,000.
12. Moreover, Respondents offer "Team Elite" training programs through membership in JKonsulting which purports to train members how to day trade and make a profit. Respondent JKonsulting claims to have 84 members on its website.
13. To date, Respondents JKonsulting and Aderemi have not contacted Investor A or returned any of his \$2,000 investment as guaranteed by the contract and the website.
14. Section 12.F states *inter alia* it shall be a violation of the provisions of this Act for any person to engage in any transaction, practice or course of business in connection with the

Temporary Order of Prohibition
-1900508-

sale of securities which works or tends to work a fraud or deceit upon the purchaser or seller thereof.

15. Section 12.G of the Act states *inter alia* that it shall be a violation of this Act for any person to obtain money or property through the sale of securities by means of any untrue statement of a material fact or any omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading.
16. By virtue of the foregoing, Respondents JKonsulting and Aderemi have each violated Sections 12.F and 12.G of the Illinois Securities Law of 1953.

COUNT II

SALE OF UNREGISTERED SECURITIES

17. Paragraphs 1 through 16 are incorporated by reference.
18. As stated above, the investment in Respondent JKonsulting constitutes the offer or sale of a security as those terms are defined in Sections 2.1, 2.5, and 2.5a of the Act.
19. Section 5 of the Act requires the registration of a security being offered or sold in the State of Illinois unless an exemption applies.
20. No security or exemption has been registered or filed with the Illinois Secretary of State.
21. Section 12.B of the Act states *inter alia* that it shall be a violation of the provisions of this Act for any person to deliver to a purchaser any security required to be registered under Section 5, Section 6, or Section 7 hereof unless accompanied or preceded by a prospectus that meets the requirements of the pertinent subsection of Section 5, Section 6, and Section 7.
22. By virtue of the foregoing, Respondents JKonsulting and Aderemi have each violated Section 12.B of the Illinois Securities Law of 1953.

COUNT III

FAILURE TO REGSITER AS A BROKER DEALER

23. Paragraphs 1 through 22 are incorporated by reference.
24. As stated above, Investor A signed a contract with Respondent JKonsulting whereby, Respondent JKonsulting held itself out as a brokerage firm.

25. Respondent JKonsulting has not registered and has never been registered as a broker dealer in the State of Illinois, nor has Respondent Aderemi been registered or has ever been registered as a securities salesperson in the State of Illinois.
26. Section 8.A of the Act states *inter alia* that every dealer, salesperson, investment adviser, and investment adviser representative shall be registered as such with the Secretary of State.
27. Section 12.C of the Act states *inter alia* that it shall be a violation of the provisions of this Act for any person to act as a dealer, salesperson, investment adviser or investment adviser representative, unless registered as such, where such registration is required, under the provisions of this Act.
28. By virtue of the foregoing, Respondents JKonsulting and Aderemi have each violated Section 12.C of the Illinois Securities Law of 1953.

COUNT IV

FAILURE TO PRODUCE

29. Paragraphs 1 through 28 are incorporated by reference.
30. During the course of its investigation, the Illinois Secretary of State issued a subpoena to Respondents JKonsulting and Aderemi at their last known addresses requesting the production of books and records, papers and other relevant documents relating to Illinois investors pursuant to Section 11.D of the Act.
31. A response to the Department's subpoena was due by November 1, 2019.
32. Respondents JKonsulting and Aderemi failed to respond or produce the requested relevant documents in furtherance of the Department's investigation.
33. Section 12.D of the Act states *inter alia* that it shall be a violation of the provisions of this Act for any person to fail to file with the Secretary of State any application, report or document required to be filed under the provisions of this Act or any rule or regulation made by the Secretary of State pursuant to this Act or to fail to comply with the terms of any order of the Secretary of State issued pursuant to Section 11 hereof.
34. By virtue of the foregoing, Respondents JKonsulting and Aderemi have each violated Section 12.D of the Illinois Securities Law of 1953.
35. Section 11.F(2) of the Act states *inter alia* the Secretary of State may temporarily prohibit, for a maximum period of 90 days, by an order effective immediately, the offer or sale of securities, or the offer or sale of securities by any person, or the business of rendering investment advice without the notice and prior hearing in this subsection

Temporary Order of Prohibition
-1900508-

prescribed, if the Secretary of State shall in his or her opinion, based on credible evidence, deem it necessary to prevent an imminent violation of the Act or to prevent losses to investors which the Secretary of State reasonably believes will occur as a result of a prior violation of this Act.

36. The entry of this **Temporary Order** prohibiting **Respondents JKonsulting, Inc. and Kevin Aderemi** from offering or selling securities, or from engaging in any course of business related to investment adviser activities, in or from the State of Illinois is in the public interest and for the protection of the investing public and is consistent with the purposes intended by the provisions of the Act.

NOW IT IS HEREBY ORDERED THAT:

Respondent **JKONSULTING, INC.**, and any of its representatives, is **PROHIBITED** from the offer or sale of securities in or from the State of Illinois, and **PROHIBITED** from engaging in the business of an investment adviser and/or an investment adviser representative in or from the State of Illinois for a period of 90 days, subject to further order of the Secretary of State.

Respondent **KEVIN ADEREMI** is **PROHIBITED** from the offer or sale of securities in or from the State of Illinois, and **PROHIBITED** from engaging in the business of an investment adviser and/or an investment adviser representative in or from the State of Illinois for a period of 90 days, subject to further order of the Secretary of State.

Delivery of this Order or any subsequent notice to the designated representative of any Respondent constitutes service upon such Respondent.

NOTICE is hereby given that Respondent may request a hearing on this matter by transmitting such request in writing to Enforcement Attorney, Frank LoScuito, Illinois Securities Department, 69 W. Washington Street, Suite 1220, Chicago, Illinois 60602. Such request must be made within thirty (30) calendar days of the date of entry of the Temporary Order of Prohibition. Upon receipt of a request for hearing, a hearing will be scheduled as soon as reasonably practicable. A request for hearing will not stop the effectiveness of this Temporary Order and will extend the effectiveness of this Temporary Order for sixty days from the date the hearing request is received by the Department.

YOUR FAILURE TO REQUEST A HEARING WITHIN THIRTY (30) DAYS AFTER ISSUANCE OF THIS ORDER SHALL CONSTITUTE AN ADMISSION OF ANY FACTS ALLEGED HEREIN AND SHALL CONSTITUTE A SUFFICIENT BASIS TO MAKE THIS ORDER FINAL.


You are further notified that if you request a hearing that you may be represented by legal counsel, may present evidence; may cross-examine witnesses and otherwise participate. Failure to so appear shall constitute default unless any Respondent has upon due notice moved for and obtained a continuance.

Temporary Order of Prohibition
-1900508-

A copy of the Rules and Regulations promulgated under the Illinois Securities Law and pertaining to hearings held by the Office of the Secretary of State, Illinois Securities Department, are available at the Departments website:

<http://www.cyberdriveillinois.com/departments/securities/abtil.html>

Date of Mailing: 20th day of November 2019



JESSE WHITE
Secretary of State
State of Illinois

Attorneys for the Secretary of State:
Frank LoScuito
Office of the Secretary of State
Illinois Securities Department
69 West Washington Street, Suite 1220
Chicago, Illinois 60602
Telephone: (312) 793-3385