

File No. 52874

**STATE OF MINNESOTA
DEPARTMENT OF COMMERCE**

In the Matter of
Titan Trade Club,
Jan Hulgesse and
Pedro Holanda

**SUMMARY ORDER
TO CEASE AND DESIST**

TO: Jan Hulgesse
Titan Trade Club
16161 W. Pima Street
Goodyear, AZ 85338

Pedro Holanda
Titan Trade Club
10521 Rodeo Drive
Anaheim, CA 92804

Commissioner of Commerce Jessica Looman (Commissioner) has determined as follows:

FINDINGS OF FACT

1. Respondent Titan Trade Club (TTC) purportedly maintains a principal place of business at 16161 W. Pima Street, Goodyear, Arizona 85338. This address appears to be a single family residence. On information and belief, TTC may have relocated to Anaheim, California. The Anaheim address is also a single family residence.

2. TTC's principals are not known, but in various marketing videos available on YouTube.com, Respondent Pedro Holanda identifies himself as TTC's Worldwide Master Distributor and Respondent Jan Hulgesse as the President of TTC.

10. On June 12, 2018, the Department served an administrative subpoena on Respondent. On July 6 (the day the response to the subpoena was due) an attorney for TTC and Holanda requested an extension of time to respond. The Department extended the response date to July 27, but there has been no further response despite several attempts to reach both Holanda and the attorney.

11. It is in the public interest of the citizens of Minnesota and for the protection of investors and the Minnesota securities markets that Respondent be prohibited from continuing to violate the requirements of the Minnesota Securities Act (MSA) in connection with investment-related activity.

CONCLUSIONS OF LAW

1. The Department has statutory authority pursuant to Minn. Stat. § 45.027 subd. 5a and Minn. Stat. § 80A.81 (2016) to enter this order directing Respondent to cease and desist from engaging in acts, practices and a course of business violative of the MSA.

2. Respondent failed to comply with Minn. Stat. §§ 80A.45-.53 (2016) by selling unregistered securities.

3. Respondents failed to comply with Minn. Stat. § 45.027 subd. 1(a) and 2 (2016) by failing to respond to the Department's administrative subpoena.

4. It is appropriate and in the public interest of the citizens of Minnesota and for the protection of investors that Respondents be summarily ordered to cease and desist from engaging in violations of the MSA set forth in the Findings of Fact.

ORDER

NOW, THEREFORE, IT IS HEREBY ORDERED, pursuant to Minn. Stat. § 45.027 subd. 5a and Minn. Stat. § 80A.81 (a) (2016) that this Order is effective immediately and Respondents shall cease and desist from offering or selling a security of any kind in the State of Minnesota or to Minnesota residents;

IT IS FURTHER ORDERED, that pursuant to Minn. Stat. § 80A.81 (2016), Respondents shall jointly and severally pay to the State of Minnesota a civil penalty in the amount of \$10,000.

NOTICE

Pursuant to Minn. Stat. §§ 45.027 Subd. 5a and 80A.81 (b) (2016) Respondent may request a hearing in this matter. Such a request shall be made in writing, via certified mail, and served upon the Commissioner, whereupon a date for hearing will be set within fifteen (15) days after receipt of the request unless Respondent and the Department agree in writing to waive the 15-day time period. If no hearing is requested by Respondent within thirty (30) days of service, this Order will become final and will remain in effect until modified or vacated by the Commissioner.

Notwithstanding Minn. Stat. §§ 45.027 Subds. 5 or 5a and 80A.81 (2016), if Respondent requests a hearing, it will be held before an Administrative Law Judge to be appointed by the Chief Administrative Law Judge for the State of Minnesota, Office of Administrative Hearings, Harold E. Stassen Office Building, State Capitol Complex, 600 North Robert Street, St. Paul, Minnesota 55146. All parties have the right to represent themselves or be represented throughout the proceedings herein by legal counsel or a

person of their choice if not otherwise prohibited as the unauthorized practice of law. The hearing will be conducted in accordance with Minn. Stat. ch. 14.

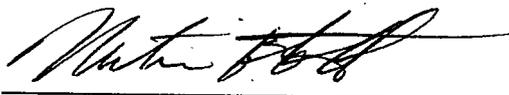
In the event a hearing is requested, the Commissioner reserves the right to seek additional remedies including costs associated with our investigation of this matter.

This order shall be effective upon signature on behalf of the Commissioner.

Dated: 11-7-2018

JESSICA LOOMAN
Commissioner

By:



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Assistant Commissioner of Enforcement
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