

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA

COMMODITY FUTURES
TRADING COMMISSION,

Plaintiff,

Case No.: 6:20-cv-01657-CEM-GJK

v.

HIGHRISE ADVANTAGE, LLC,
BULL RUN ADVANTAGE, LLC,
GREEN KNIGHT INVESTMENTS,
LLC, KING ROYALTY LLC, SR&B
INVESTMENT ENTERPRISES,
INC., AVINASH SINGH, RANDY
ROSSEAU, DANIEL COLOGERO,
HEMRAJ SINGH, and SURUJPAUL
SAHDEO,

Defendants.

**PLAINTIFF’S [UNOPPOSED] MOTION FOR ENTRY OF CONSENT
ORDERS FOR PERMANENT INJUNCTION CIVIL MONETARY
PENALTY AND OTHER EQUITABLE RELIEF AGAINST DEFENDANTS
BULL RUN ADVANTAGE, LLC, RANDY ROSSEAU, GREEN KNIGHT
INVESTMENTS, LLC, DANIEL COLOGERO, KING ROYALTY LLC,
HEMRAJ SINGH, SR&B INVESTMENT ENTERPRISES, INC. AND
SURUJPAUL SAHDEO**

Plaintiff, Commodity Futures Trading Commission (“Commission” or
“CFTC”) filed A Complaint (ECF No. 1) against Defendants Highrise Advantage,
LLC, Bull Run Advantage, LLC, (“Bull Run”), Green Knight Investments, LLC
 (“Green Knight”), King Royalty LLC (“King Royalty”), SR&B Investment
Enterprises, Inc. (“SR&B”), Avinash Singh, Randy Rosseau (“Rosseau”), Daniel

Cologero (“Cologero”), Hemraj Singh (“Raj”), and Surujpaul Sahdeo (“Sahdeo”) , seeking injunctive and other equitable relief, as well as the imposition of civil penalties, for violations of the Commodity Exchange Act (“Act”), 7 U.S.C. §§ 1–26, and the Commission’s Regulations (“Regulations”) promulgated thereunder, 17 C.F.R. pts. 1–190 (2022). On February 1, 2021, the Commission filed an Amended Complaint. (ECF No. 98). In connection therewith, the parties have agreed to enter into proposed Consent Orders for Permanent Injunction, and Other Equitable Relief Against Bull Run and Rosseau, Green Knight and Cologero, King Royalty and Raj, and SR&B and Sahdeo (“Settling Defendants”) as set forth in Attachments A through D. Specifically, Settling Defendants agree to findings of fact that they operated feeder pools that accepted pool participant funds for the purpose of engaging in retail foreign currency transactions (“forex”) in the name of the feeder pools and that the operation of those pools operated as frauds or deceits on pool participants. The Settling Defendants also agree to the entry of conclusions of law that they violated Section 4o(1)(B) of the Act, 7 U.S.C. §6o(1)(B) and Regulations 4.20(a)(1),(b), 4.21(a)(1), 17. C.F.R. §§ 4.20(a)(1)(b), 4.21(a)(1)(2022). In addition, Bull Run, Green Knight, King Royalty and SR&B agree that they acted as commodity pool operators (CPOs”) without being registered, thereby engaging in violations of Sections 2(c)(2)(C)(iii)(I)(cc) and 4m(1) of the Act, 7 U.S.C. §§ 2(c)(2)(C)(iii)(I)(cc) and 6m(1), and Regulation

5.3(a)(2)(i), 17 C.F.R. § 5.3(a)(2)(i). Moreover, Rosseau, Cologero, Raj and Sahdeo agree that they acted as associated persons (“APs”) of a CPO without being registered and Bull Run, Green Knight, King Royalty and SR&B that they allowed Rosseua, Cologero, Raj and Sahdeo to act as APs of their respective CPOs without benefit of registration and thus all Settling Defendants engaged in violations of Section 4k(2) of the Act , 7 U.S.C.§ 6k(2) and Regulations 3.12 and 5.3(a)(2)(ii), 17 C.F.R. §§3.21m 5.3(a)(2)(ii)(2022).

The parties also agree to the entry of equitable relief in the form of permanent injunctions prohibiting the Settling Defendants from further violations of the Act and Regulations as charged, and that permanent trading and registration bans should be imposed. The parties also agree that the Settling Defendants should also be ordered to pay restitution and civil monetary penalties in the amounts set forth their respective Consent Orders.

The stipulated Consent Orders will promote judicial economy by resolving all of the contested issues in the case.

WHEREFORE, in light of the parties having agreed upon a resolution of this case, the Plaintiff respectfully requests the Court’s consideration and approval of the attached Consent Orders.

Date: June 23, 2023

Respectfully submitted,

By: /s/ Susan B. Padove
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Attorney for Plaintiff
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