



**COMMISSIONER OF SECURITIES
STATE OF GEORGIA**

In the matter of

**Ikenna Ikokwu (CRD #4170987),
Winning the Money Game, LLC
(CRD #149578), and Winning the
Money Game with Ike, Inc.**

Respondents

Case Number: ENSC-140446

CONSENT ORDER

Pursuant to O.C.G.A. § 10-5-71(a)(1) of the Georgia Uniform Securities Act of 2008, O.C.G.A. § 10-5-1, et seq. (“Act”), the Commissioner of Securities for the State of Georgia (“Commissioner”) caused an investigation to be made into Ikenna Ikokwu (“Ikokwu”), Winning the Money Game, LLC (“WTMG”), and Winning the Money Game with Ike, Inc. (“Ike Inc.”) (collectively “Respondents”) to determine whether Respondents had violated the Act or a rule adopted by the Commissioner thereunder (“Rules”). The Commissioner subsequently determined that Respondents had in fact engaged in actions constituting violations of the Act and the Rules. As a result, pursuant to O.C.G.A. § 10-5-73, the Commissioner issued Respondents a Proposed Order to Cease and Desist Revoking Registrations and Notice of Opportunity for Hearing dated May 15, 2018 (“Proposed Order”).

On June 13, 2018, Respondents timely requested a pre-hearing conference pursuant to Rule 590-4-6-.12. Respondents’ request for a pre-hearing conference was duly accepted by the Commissioner, thereby tolling the thirty (30) day time period for requesting and setting any formal hearing before the Commissioner. Having considered information provided by Respondents and representations made by Respondents during the pre-hearing conference period, the Commissioner and Respondents hereby agree to the terms and conditions set forth herein.

CONSENT TO JURISDICTION AND WAIVER

1. Respondents consent to the jurisdiction of the Commissioner over Respondents and this matter pursuant to the Act.

2. Without Respondents admitting or denying the Findings of Fact and Conclusions of Law herein, Respondents and the Commissioner stipulate and agree to the issuance of this Consent Order without further proceedings in this matter, agreeing to be fully bound by the terms and conditions specified herein.

3. Respondents agree not to take any action or to make or permit to be made any public statements creating the impression that this Consent Order is without factual basis.

4. Respondents stipulate and agree with the Commissioner that should any facts herein prove to be false, the Commissioner reserves the right to pursue any and all legal or administrative remedies at his disposal.

5. Respondents, through the execution of this Consent Order, voluntarily waive their rights to a formal hearing on this matter and to judicial review of this Consent Order.

6. Respondents enter into this Consent Order voluntarily and represent that no threats, offers, promises, or inducements of any kind have been made by the Commissioner or any member, officer, employee, agent, or representative of the Commissioner to induce Respondents to enter into this Consent Order.

FINDINGS OF FACT

7. Ikokwu was registered with the Commissioner as an investment adviser representative of WTMG. Ikokwu's registration with WTMG as an investment adviser representative was approved on April 7, 2009 and terminated voluntarily on June 4, 2018. Ikokwu's CRD Number is 4170987. Ikokwu's principal place of business is 1050 Cambridge Square, Suite D, Alpharetta, Georgia 30009.

8. WTMG is registered with the Commissioner as an investment adviser. WTMG's registration as an investment adviser was approved on April 7, 2009. WTMG's CRD Number is 149578. WTMG's principal place of business is 1050 Cambridge Square, Suite D, Alpharetta, Georgia 30009.

9. Ike Inc. is a Georgia corporation with a principal business address of 1050 Cambridge Square, Suite D, Alpharetta, Georgia 30009. Ikokwu is the Chief Executive Officer ("CEO") and Chief Financial Officer ("CFO") of Ike Inc. Ike Inc. provides financial planning services and is not registered with the Commissioner in any capacity.

10. Respondents are subject to the provisions of the Act and the Rules and Regulations

(“Rules”) promulgated thereunder.

11. On March 21, 2018, the Respondents consented to a civil action filed by the Securities and Exchange Commission (“SEC”) entitled Securities and Exchange Commission v. Ikenna Ikokwu, et al., Civil Action Number 1:16-CV-01950, in the United States District Court for the District of Columbia. The final judgment in the civil action was filed on April 2, 2018.

12. On April 26, 2018, the SEC accepted an Offer of Settlement from the Respondents to close administrative proceedings against the Respondents. The administrative proceedings are entitled In the Matter of Winning the Money Game With Ike, Inc., Administrative Proceeding File No. 3-18456 and In the Matter of Ikenna Ikokwu, Administrative Proceeding File No. 3-18455.

13. The SEC’s complaint against the Respondents alleged that from 2012 through April 2014, Ike Inc. acted as an unregistered broker-dealer by offering for sale and selling securities issued by FutureGen, Inc. (“FutureGen”). The SEC alleged that Ikokwu acted as an unregistered broker-dealer agent for the same offer for sale and sale of FutureGen securities. The SEC alleged that both Ike Inc. and Ikokwu received compensation for the sale of the FutureGen securities. The SEC exposed FutureGen as a Ponzi-like fraud perpetrated by Lawrence Schmidt (“Schmidt”).

14. The SEC alleged that, Ike Inc. and Ikokwu “mislead its customers by, among other things, failing to disclose compensation received from FutureGen for each sale, falsely claiming that Ikokwu had performed extensive due diligence into FutureGen, and touting Ikokwu’s personal and family investments in FutureGen related entities while failing to disclose that his largest investment was delinquent.”

15. Respondents consented to the SEC’s findings and the imposition of sanctions. The Respondents were ordered, on a joint and several basis, to pay disgorgement of one hundred sixty nine thousand three hundred eleven dollars and sixty-four cents (\$169,311.64) and prejudgment interest of six thousand eight hundred sixty nine dollars and ninety-three cents (\$6,869.93). Additional sanctions imposed included:

WTMG:

- a) permanently restrained and enjoined from violating Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5 promulgated thereunder;
- b) permanently restrained and enjoined from violating Section 17(a) of the Securities Act of 1933; and
- c) permanently restrained and enjoined from violating Sections 206(1) and (2) of the Investment Advisers Act of 1940.

Ike Inc.:

- a) permanently restrained and enjoined from violating Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5 promulgated thereunder;
- b) permanently restrained and enjoined from violating Section 15(a)(1) of the Securities Exchange Act of 1934;
- c) permanently restrained and enjoined from violating Section 17(a) of the Securities Act of 1933;
- d) permanently restrained and enjoined from violating Sections 206(1) and (2) of the Investment Advisers Act of 1940;
- e) barred for at least five (5) years from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization; and
- f) barred for at least five (5) years from participating in any offering of a penny stock, including: acting as a promoter, finder, consultant. Agent or other person who engages in activities with a broker, dealer or issuer for purpose of the issuance or trading in any penny stock, or inducing or attempting to induce the purchase or sale of any penny stock.

Ikokwu:

- a) permanently restrained and enjoined from violating Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5 promulgated thereunder;
- b) permanently restrained and enjoined from violating Section 15(a)(1) of the Securities Exchange Act of 1934;
- c) permanently restrained and enjoined from violating Section 17(a) of the Securities Act of 1933;
- d) permanently restrained and enjoined from violating Sections 206(1) and (2) of the Investment Advisers Act of 1940;
- e) barred for at least five (5) years from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization; and
- f) barred for at least five (5) years from participating in any offering of a penny stock, including: acting as a promoter, finder, consultant. Agent or other person who engages in activities with a broker, dealer or issuer for purpose of the issuance or trading in any penny stock, or inducing or attempting to induce the purchase or sale of any penny stock.

CONCLUSIONS OF LAW

16. Paragraphs 1 through 15 are incorporated by reference as though fully set forth herein.

17. The Commissioner has jurisdiction over this matter pursuant to the Act.¹

18. Pursuant to O.C.G.A. § 10-5-70, *et seq.*, the Commissioner is authorized to institute this investigation and issue this Order.

19. Pursuant to O.C.G.A. § 10-5-41(b), the Commissioner may issue an order revoking the registration of a registrant if the Commissioner finds that it is in the public interest and the Commissioner's action is authorized by O.C.G.A. § 10-5-41(d).

20. Pursuant to O.C.G.A. § 10-5-41(c), the Commissioner may issue an order imposing a bar on a registrant if the Commissioner finds that it is in the public interest and the Commissioner's action is authorized by O.C.G.A. § 10-5-41(d).

21. A person may be disciplined pursuant to O.C.G.A. § 10-5-41(d)(5)(C) if the person is the subject of an order, issued after notice and opportunity for hearing by the SEC.

22. A person may be disciplined pursuant to O.C.G.A. § 10-5-41(d)(6) if the person is the subject of an adjudication or determination, after notice and opportunity for hearing, by the SEC that the person willfully violated the Securities Act of 1933, the Securities Exchange Act of 1934, or the Investment Advisers Act of 1940.

23. The SEC actions against the Respondents are actionable events pursuant to O.C.G.A. §§ 10-5-41(d)(5)(C) and 10-5-41(d)(6) and therefore, under O.C.G.A. §§ 10-5-41(b) and (c) Respondents are subject to discipline.

ORDER

WHEREFORE, by the authority vested in me as the Commissioner of Securities for the State of Georgia, **IT IS HEREBY ORDERED**:

1. **Winning the Money Game, LLC** will voluntarily terminate its registration with the Commissioner of Securities as an investment adviser pursuant to O.C.G.A. § 10-5-34.

2. **Ikenna Ikokwu** is **BARRED** from association with any broker, dealer, or investment adviser for a period of five (5) years with the right to apply for registration no sooner than April 26, 2023.

3. **Winning the Money Game, LLC** is **BARRED** from registering with the Commissioner as an investment adviser or broker-dealer for a period of five (5) years with the right to apply for registration no sooner than April 26, 2023.

¹ See O.C.G.A. §§ 10-5-70 and 10-5-71.

4. **Ikenna Ikokwu CEASE AND DESIST** from all violations of the Georgia Uniform Securities Act of 2008.

5. **Winning the Money Game, LLC CEASE AND DESIST** from all violations of the Georgia Uniform Securities Act of 2008.

6. **Winning the Money Game with Ike, Inc. CEASE AND DESIST** from all violations of the Georgia Uniform Securities Act of 2008.

The entry of this Consent Order is deemed to be in the public interest, and shall not be deemed to constitute findings or conclusions relating to other persons unrelated to the Respondents and shall not be deemed to be a waiver or estoppel on the part of the Commissioner from proceeding in individual actions against any person who may have violated the Act or any transactions not specifically referred to herein or not known to the Commissioner at the time this Order was issued. If at any time it appears to the Commissioner that Respondents have failed to comply with this Consent Order or has made any other material misrepresentations or omissions in regards to this matter, the Commissioner may take further action.

SO ORDERED this 23rd day of August, 2018.

BRIAN P. KEMP
SECRETARY OF STATE
COMMISSIONER OF SECURITIES

By:


C. Ryan Germany
Assistant Commissioner of Securities

CONSENT OF ENTRY OF CONSENT ORDER BY IKENNA IKOKWU, WINNING THE MONEY GAME, LLC, AND WINNING THE MONEY GAME WITH IKE, INC.

Ikenna Ikokwu ("Ikokwu"), Winning the Money Game, LLC ("WTMG"), and Winning the Money Game with Ike, Inc. ("Ike Inc") (collectively "Respondents") hereby acknowledge that they have been served with a copy of this Consent Order, have read the foregoing Consent Order, are aware of their rights to a hearing and appeal in this matter, and have waived the same.

Respondents admit the jurisdiction of the Georgia Commissioner of Securities and consent to entry of this Consent Order as settlement of the issues contained in this Consent Order.


Respondents agree that they shall not claim, assert, or apply for a tax deduction or tax credit with regard to any state, federal, or local tax for any administrative monetary penalty that Respondents shall pay pursuant to this Consent Order.

Respondents state that no promise of any kind or nature whatsoever was made to them to induce them to enter into this Consent Order and that they have entered in this Consent Order voluntarily.

Ikokwu represents that he is an officer of WTMG and Ike Inc and that, as such, has been authorized by WTMG and Ike Inc to enter into this Consent Order for and on behalf of WTMG and Ike Inc.

Dated this 17 day of AUGUST 2018

Winning the Money Game, LLC




BY: Ikenna Ikokwu

TITLE: Organizer

State of GA

County of Fulton

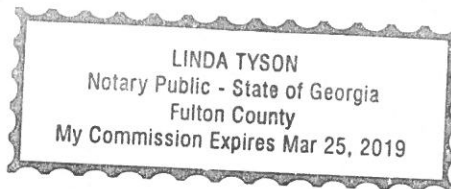
SUBSCRIBED AND SWORN TO before me this 17th day of Aug, 2018



Notary Public

My commission expires:

3/25/19



Dated this 17th day of Aug, 2018

Ikenna Ikokwu

[Signature]

BY: Ikenna Ikokwu
TITLE: Individual

State of GA

County of Fulton

SUBSCRIBED AND SWORN TO before me this 17th day of Aug, 2018

[Signature]

Notary Public

My commission expires:

3/25/19



Dated this 17th day of Aug, 2018

Winning the Money Game with Ike, Inc.

[Signature]

BY: Ikenna Ikokwu
TITLE: Chief Executive Officer

State of GA

County of Fulton

SUBSCRIBED AND SWORN TO before me this 17th day of Aug, 2018

[Signature]

Notary Public

My commission expires:

3/25/19

