

**ADMINISTRATIVE PROCEEDING
BEFORE THE
SECURITIES COMMISSIONER OF MARYLAND**

IN THE MATTER OF:	*	
SANDRA FERGUSON-HUNTE	*	Securities Docket No. 2025-0508
AND	*	
SILVERTOWN VALLEY, INC.	*	
Respondents	*	
* * * * * * * * * * * *		

ORDER TO SHOW CAUSE

WHEREAS, the Securities Division of the Office of the Maryland Attorney General (the “Division”), pursuant to the authority granted in section 11-701 of the Maryland Securities Act, Corporations and Associations Article, Title 11, Annotated Code of Maryland (Repl. Vol. 2025) (the “Act” or “Securities Act”), undertook an investigation into the activities of Sandra Ferguson-Hunte (“Ferguson-Hunte”), and Silvertown Valley, Inc (“Silvertown”) (collectively “Respondents”); and

WHEREAS, on the basis of that investigation, the Securities Commissioner has determined that Respondents may have violated the registration and anti-fraud provisions of the Securities Act; and

WHEREAS, the Commissioner has determined that it is in the public interest to issue this Order to Show Cause;

NOW THEREFORE, pursuant to sections 11-301, 11-401, 11-402, 11-501, 11-701.1 and 11-801 of the Act, it is hereby:

ORDERED, that Respondents show cause why they should not be barred permanently from

engaging in the securities and investment advisory business in Maryland for or on behalf of others, or from acting as principal or consultant for any such business, why they should not be ordered to permanently cease and desist from further violations of the Act, why a monetary penalty of \$5,000 per violation should not be entered against Respondents, and why any other sanction or combination of sanctions against Respondents as permitted under section 11-701.1 should not be entered.

The Commissioner alleges the following as a basis for this Order to Show Cause:

I. JURISDICTION

1. The Commissioner has jurisdiction in this proceeding pursuant to section 11-701.1 and 11-801 of the Act.

II. RESPONDENTS

2. Ferguson-Hunte resides in Somerset County, New Jersey. She has never been registered as a broker-dealer, agent, investment adviser, or investment adviser representative in the State of Maryland.

3. Silvertown is a New Jersey corporation doing business in Union County, New Jersey. It has never been registered as a broker-dealer or investment adviser in the State of Maryland. Ferguson-Hunte is the Chief Executive Officer of Silvertown.

III. STATEMENT OF FACTS

4. On or about April 10, 2024, Maryland resident MA was solicited by Ferguson-Hunte to invest \$10,000 in a “short-term investment program that pays a projected return of 400,000 [sic] the investment amount as described below...[Silvertown agreed] to facilitate the transaction in conjunction with the Trade Platform, ADF Holdings, who will be performing the trade.” MA was promised she would “receive total payments from the trade program estimated to

be Four Hundred Thousand Dollars (\$400,000.00) completing in approximately 20 to 30 business days from funding date of the program.”

5. The same day, MA wired \$10,000 from her bank account to the bank account of Ferguson-Hunte’s son, Justin Hunte. \$9,060 was immediately wired from that account to The Top Property Group, Limited (“Top Property”).

6. Top Property appears to be a real estate development company in South Africa that raises money from investors. See <https://thetoppropertygroup.com/>.

7. Between January 19, 2024 and May 22, 2024, Justin Hunte’s bank account wired at least \$87,490 to Top Property.

8. On information and belief, the funds wired to Top Property were pooled in Justin Hunte’s bank account and came from other investors in Respondents’ securities scam.

9. Respondents did not disclose any risks to investor MA, including the risk of losing her investment funds and only emphasized to MA the profits she would make.

10. Respondents did not disclose that they were operating a securities scam and that they would use investors’ funds for an investment in Top Property.

11. Respondents did not disclose that they were not registered to offer or sell securities in Maryland and that the securities themselves were not registered or exempt from registration in Maryland.

COUNT I
(Offer and Sale of Unregistered Securities - section 11-501)
(All Respondents)

WHEREAS, the investments described herein as offered and sold by Respondents constitute “securities” within the definition contained in section 11-101(s) of the Act; and

WHEREAS, section 11-501 of the Act makes it unlawful for any person to offer or sell

securities in this State unless the security is registered, exempt from registration under Subtitle 6 of the Act, or qualifies as a federal covered security; and

WHEREAS, Respondents offered and sold securities as described in the statement of facts; and

WHEREAS, the securities offered and sold by Respondents are not registered with the Division, nor has a claim of exemption from registration or a claim that the securities are federal covered securities been filed with respect to the offering; and

WHEREAS, Respondents have offered and sold securities in violation of the registration requirements of section 11-501 of the Act; and

NOW, THEREFORE, IT IS HEREBY **ORDERED** that each Respondent show cause why a final order should not be issued against them that orders Respondents to permanently cease and desist from engaging in further violations of the securities registration provisions of section 11-501 of the Act, assesses Respondents the statutory penalty of \$5,000 per violation of section 11-501 of the Act, permanently bars Respondents from the securities and investment advisory business in Maryland, orders Respondents to permanently cease and desist from further violations of the Act, and orders any other sanction or combination of sanctions against Respondents as permitted under section 11-701.1 of the Act.

COUNT II
(Unregistered Broker-Dealer or Agent - section 11-401(a))
(All Respondents)

WHEREAS, section 11-101(c) of the Act defines “broker-dealer” to mean a person engaged in the business of effecting transactions in securities for the account of others or for his own account; and

WHEREAS, section 11-101(l) of the Act defines “issuer” to mean any person who issues

or proposes to issue a security; and

WHEREAS, section 11-101(b) of the Act defines “agent” to mean an individual other than a broker-dealer who represents a broker-dealer or issuer in effecting or attempting to effect the purchase or sale of securities; and

WHEREAS, section 11-401(a) of the Act makes it unlawful for any person to transact business in this State as a broker-dealer or agent unless that person is registered as a broker-dealer or agent; and

WHEREAS, Respondents have transacted business as a broker-dealer or agent in this State by effecting or attempting to effect securities transactions in the investments described in the statement of facts while they were not registered with the Division as a broker-dealer or agent, in violation of section 11-401(a) of the Act; and

NOW, THEREFORE, IT IS HEREBY **ORDERED** that each Respondent show cause why a final order should not be issued against them that orders Respondents to cease and desist from engaging in further violations of the registration provisions of section 11-401(a) of the Act, assesses Respondents the statutory penalty of \$5,000 per violation of section 11-401(a) of the Act, permanently bars Respondents from the securities and investment advisory business in Maryland, orders Respondents to permanently cease and desist from further violations of the Act, and orders any other sanction or combination of sanctions against Respondents as permitted under section 11-701.1 of the Act.

COUNT III
(Employment of Unregistered Agents - section 11-402(a))
(Corporate Respondent)

WHEREAS, section 11-101(l) of the Act defines “issuer” to mean any person who issues or proposes to issue a security; and

WHEREAS, section 11-101(c) of the Act defines “broker-dealer” to mean a person engaged in the business of effecting transactions in securities for the account of others or for his own account; and

WHEREAS, section 11-101(a) of the Act defines “agent” to mean an individual other than a broker-dealer who represents a broker-dealer or issuer in effecting or attempting to effect the purchase or sale of securities; and

WHEREAS, the investments described above offered by Respondents are securities under section 11-101(s) of under the Act; and

WHEREAS, section 11-402(a) of the Act makes it unlawful for any broker-dealer or issuer to employ or associate with an agent unless the agent is registered; and

WHEREAS, Respondent Silvertown employed an agent, Ferguson-Hunte, to engage in the offer and sale of securities without Ferguson-Hunte being registered in this State as an agent; and

NOW, THEREFORE, IT IS HEREBY **ORDERED** that Respondent Silvertown show cause why a final order should not be issued against it that orders Respondent Silvertown to cease and desist from engaging in activities in further violation of the agent registration provisions of section 11-402 of the Act, assesses Respondent Silvertown the statutory penalty of \$5,000 per violation of section 11-402 of the Act, permanently bars Respondent Silvertown from the securities and investment advisory business in Maryland, orders Respondent Silvertown to permanently cease and desist from further violation of the Act, and orders any other sanction or combination of sanctions against Respondent Silvertown as permitted under section 11-701.1 of the Act.

COUNT IV
(Fraud in Connection with the Offer or Sale of Securities - section 11-301)
(All Respondents)

WHEREAS, section 11-301 of the Securities Act makes it unlawful for any person, in

connection with the offer, sale or purchase of any security, directly or indirectly to:

- (1) employ any device, scheme or artifice to defraud;
- (2) make any untrue statement of a material fact or omit to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading; or
- (3) engage in any act, practice or course of business which operates or would operate as a fraud or deceit on any person; and

WHEREAS, Respondents employed a device, scheme or artifice to defraud in connection with the offer, sale or purchase of securities by failing to disclose the risks involved in the investments and claiming that investor funds would be used for an investment in a trading program as described in the statement of facts; and

WHEREAS, Respondents made untrue statements of material fact or omitted to state material facts in connection with the offer, sale or purchase of securities by, among other things, failing to disclose the risks involved in the investments, failing to disclose that the securities were unregistered and no claim for an exemption was filed, and claiming that investor funds would be used for a trading program, as described in the statement of facts; and

WHEREAS, by engaging in the offer and sale of securities as described in the statement of facts Respondents engaged in acts, practices or a course of business that operated as a fraud or deceit on the investor when they failed to disclose the risks involved in the investments and when they told the investor she would receive her returns in 20 to 30 business days; and

NOW, THEREFORE, IT IS HEREBY **ORDERED** that each Respondent show cause why a final order should not be issued against them that orders Respondents to cease and desist from engaging in the offer and sale of securities in violation of the antifraud provisions of section 11-301 of the Securities Act, assesses Respondents the statutory penalty of \$5,000 per violation,

permanently bars Respondents from engaging in the securities and investment advisory business in Maryland, orders Respondents to permanently cease and desist from further violations of the Act, and orders any other sanction or combination of sanctions against Respondents as permitted under section 11-701.1.

REQUIREMENT OF ANSWER AND NOTICE OF OPPORTUNITY FOR HEARING

IT IS FURTHER ORDERED, pursuant to section 11-701.1 of the Act and COMAR 02.02.06.06, each Respondent shall file with the Commissioner a written Answer to this Order within 15 days of service of the Order. The Answer shall admit or deny each factual allegation in the Order and shall set forth affirmative defenses, if any. A Respondent without knowledge or information sufficient to form a belief as to the truth of an allegation shall so state.

The Answer also shall indicate whether the Respondent requests a hearing. A hearing will be scheduled in this matter if one is requested in writing. Failure by any Respondent to file a written request for a hearing in this matter shall be deemed a waiver by that Respondent of the right to such a hearing.

Failure of any Respondent to file an Answer, including a request for a hearing, shall result in entry of a final order:

- (a) imposing on that Respondent a monetary penalty of up to \$5,000 per violation of the Securities Act;
- (b) barring that Respondent from engaging in the securities or investment advisory business in Maryland for or on behalf of any others, or from acting as principal or consultant in any entity so engaged;
- (c) revoking that Respondent's broker-dealer, investment adviser, agent or investment adviser representative registration;
- (d) ordering that Respondent to permanently cease and desist from further violation of the Act; and

- (e) imposing any other sanctions or combination of sanctions lawful under section 11-701.1 of the Act.

SO ORDERED:

**Commissioner's Signature on File
w/Original Documents**

April 21, 2026

Melanie Senter Lubin
Maryland Securities Commissioner

