

<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO 1437 Bannock Street Denver, Colorado 80202</p> <hr/> <p>PHILIP J. WEISER, COLORADO ATTORNEY GENERAL, in his official capacity,</p> <p>Plaintiff,</p> <p>v.</p> <p>NEEX LLC</p> <p>Defendant.</p>	<p>DATE FILED May 20, 2026 8:49 AM FILING ID: 51C33D546BB5D CASE NUMBER: 2026CV31825</p> <p>▲ COURT USE ONLY ▲</p>
<p>PHILIP J. WEISER, Attorney General LAUREN DICKEY, 45773* First Assistant Attorney General CONOR A. KRUGER, 54111* SARAH C. BARRON, 62530* Assistant Attorneys General Ralph L. Carr Judicial Center 1300 Broadway, 9th Floor Denver, CO 80203 Telephone: (720) 508-6200 *Counsel of Record</p>	<p>Case No.</p> <p>Div.:</p>
<p style="text-align: center;">COMPLAINT FOR JUDICIAL DISSOLUTION OF LIMITED LIABILITY COMPANY, NEEX LLC</p>	

Plaintiff Philip J. Weiser, Attorney General for the State of Colorado, in his official law enforcement capacity, alleges as follows:

INTRODUCTION

1. This is an action for judicial dissolution brought by the Attorney General for the State of Colorado, Philip J. Weiser, in his official capacity, pursuant to the Colorado Limited Liability Company Act, Colo. Rev. Stat. sections 7-80-810 through 813. The Attorney General seeks dissolution of the fraudulently formed and operated business entity “Neex LLC.”

2. Defendant Neex LLC (SOS ID#: 20251160194) (“Fraudulent Neex” or “Defendant”) fraudulently filed its articles of organization with the Colorado Secretary of State by listing as its principal office and registered agent address a Colorado-based commercial building with no connection to the company.

3. On information and belief, Defendant used this address in its filings with the Colorado Secretary of State because the property is a commercial office building with multiple tenants. Using a commercial property is a common tactic among individuals who register fraudulent entities.

4. Defendant’s name is nearly identical to a legitimate company named “Neex (Pty) Ltd.” (Neex Ltd. or “legitimate Neex”). Neex Ltd. is a private company incorporated at No. 5 Murano, Corner Bellairs and Comaro Drive, Glenvista, Gauteng 2058, South Africa.

5. Neex Ltd. operates as a CFD (Contract for Differences) Broker offering online investment services. It represents on its website, www.neex.com, that it is an authorized Financial Services Provider (FSP No. 49937).

6. The Neex entity at issue here—the Fraudulent Neex—also claimed to operate an online investment platform. Upon information and belief, Fraudulent Neex was intentionally incorporated in Colorado for the purpose of impersonating the legitimate Neex Ltd., misleading consumers, and inducing them to deposit investment funds on the fraudulent Neex LLC platform.

7. As set forth above and below, Neex LLC procured its articles of organization through fraud and abused the authority conferred upon it by law. The Attorney General therefore requests that this Court order the judicial dissolution of Neex LLC.

PARTIES

8. Plaintiff Philip J. Weiser is the duly elected Attorney General of the State of Colorado and is authorized under Colo. Rev. Stat. section 7-80-810(1) to initiate proceedings to dissolve fraudulently established limited liability companies (“LLCs”).

9. Defendant Neex LLC is currently registered with the Colorado Secretary of State. This entity lists its principal office address and registered agent address as 1600 Stout St, Denver, Colorado 80202 (“Stout Street Address”).

10. Defendant Neex LLC was formed on February 8, 2025. In its articles of organization, Defendant listed “MUNOZ CHRISTOPHER RORFRT” as its registered agent. It listed the Stout Street Address as its principal office street address, principal office mailing address, registered agent street address, and registered agent mailing address. But there is no such company or registered agent located at the Stout Street Address.

JURISDICTION AND VENUE

11. Pursuant to Colo. Rev. Stat. sections 7-80-810(1)(a) and (b), this Court has jurisdiction to dissolve a Colorado LLC if the Attorney General establishes that the LLC obtained its articles of organization through fraud or that the LLC has exceeded or abused the authority conferred upon it by law.

12. Venue is proper in Denver District Court. Under Colo. Rev. Stat. section 7-80-811(1), “[a] judicial proceeding by the attorney general to dissolve a limited liability company shall be brought in the district court for the county in this state in which the street address of the limited liability company’s principal office or the street address of its registered agent is located[.]” Here, the Defendant lists the Stout Street Address, located in Denver County, as both its principal office address and as the address of its registered agent.

RELEVANT TIMES

13. The conduct that gives rise to the claims in this Complaint began no later than February 2025 and continues through the present.

STATUTORY BACKGROUND

14. The Colorado Limited Liability Companies Act (“the Act”) sets forth the procedure for judicial dissolution of an LLC. *See* C.R.S. §§ 7-80-810 – 813.

15. The Act provides that an LLC may be dissolved in a proceeding by the Attorney General if it is established that the LLC obtained its articles of organization through fraud or if the LLC has continued to exceed or abuse the authority conferred upon it by law. *See* C.R.S. § 7-80-810(1)(a) and (b).

16. In such a proceeding, the Court may, after a hearing, determine that “one or more grounds exist for judicial dissolution under Colo. Rev. Stat. section 7-80-810” and enter a decree dissolving the LLC. C.R.S. § 7-80-813(1).

17. The Clerk of the Court shall then deliver a certified copy of the decree to the Secretary of State for filing. *Id.*

18. After the Court enters the decree, “the court shall direct the winding up and liquidation of the [LLC’s] business and affairs in accordance with [Colo. Rev. Stat.] section 7-80-803 and the giving of notice to claimants in accordance with sections 7-90-911 and 7-90-912.” C.R.S. §7-80-813(2).

ALLEGATIONS

I. Fraudulent Websites and Activity

19. Defendant Neex LLC was formed with the Colorado Secretary of State on February 8, 2025.

20. Upon information and belief, after forming the fraudulent Neex LLC in Colorado, the individuals responsible for establishing this entity created multiple websites (the “Fraudulent Websites”) meant to mimic the legitimate Neex Ltd.’s website and deceive consumers out of potentially millions of dollars.

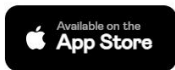
21. These unknown individuals created, at a minimum, the websites <https://neex-llc.com>, <https://neex-llc.net>, <https://neexllc.com>, <https://neexllcpro.com>, <https://neexllc.net>, and <https://neexllcpro.net>.

22. All of these websites bearing the Neex LLC name were created between February 11 and February 12, 2025.¹

23. These sites were nearly identical to one another:

¹ <https://viewdns.info/whois/?domain=www.neex-llc.com>, <https://viewdns.info/whois/?domain=neexllc.com>, <https://viewdns.info/whois/?domain=neexllc.com>, <https://viewdns.info/whois/?domain=neexllcpro.com>, <https://viewdns.info/whois/?domain=neexllc.net>, <https://viewdns.info/whois/?domain=neexllcpro.net>

Buy, trade, and hold 350+ cryptocurrencies on the best platform.

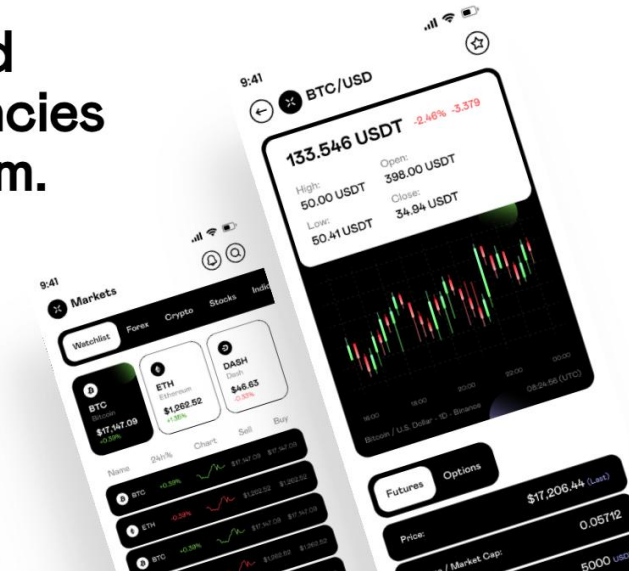


✦ Application

Mobile banking that throws out the role book and gives you a precision tool for managing your finances.

✦ Crypto deposit

By using cryptocurrency for deposit, an additional layer of security is obtained, and quick transaction processing is ensured.



<https://neexllc.com/#/>

NEEX LLC Home Market Smart trading Stock pre sale Loan NFTs Account Language ▾ Login Sign up

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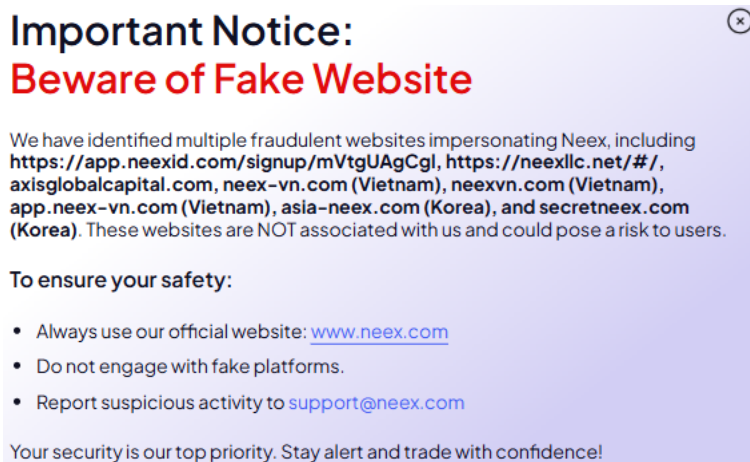
<https://neexllc.net/#/>

24. The Fraudulent Websites included a list of purported “Partners” on each of their websites; those “partners” included former SEC Chairman Gary Gensler, American investor Jim Rogers, American hedge fund manager Steve Cohen, CEO and Chairman of JPMorgan Chase Jamie Dimon, and American hedge fund manager Raymond Thomas Dalio. See <https://neexllc.com/#/aboutUs>.

25. Upon information and belief, none of these individuals were “partners” of the Fraudulent Neex.

26. The Fraudulent Websites used similar markings to the legitimate Neex Ltd.’s website and offered similar services to the legitimate Neex Ltd.

27. The legitimate Neex Ltd. was aware of these imposters and urged consumers to contact them about the fraudulent imposter sites. Until recently, the landing page of the legitimate Neex Ltd.'s website displayed the following pop-up:



28. At least one Colorado senior citizen reported losing over \$125,000 to a pig butchering scam¹ perpetrated by www.neex-llc.com.

29. In June 2025, upon learning about the fraudulent Neex LLC and its victims, the Attorney General contacted the webhost for the Fraudulent Websites, “Gname.” The Attorney General alerted Gname to the fraudulent Neex LLC’s activities as a business imposter and provided information showing that the Fraudulent Websites were violating Gname’s Terms of Service. In response, Gname took down the Fraudulent Websites. The Fraudulent Websites have not been operational since that time.

II. Fraudulent Address

30. Defendant Neex LLC was organized with the Colorado Secretary of State on February 8, 2025, by an individual purported to be named “MUNOZ CHRISTOPHER RORFRT” (“Rorft”). The articles of organization identified the Stout Street Address as Defendant’s principal office address and as the location of its purported registered agent, Rorft.

¹ A pig butchering scam is a type of scam in which the victim is encouraged to make increasing financial “investments” over a period of time, whether in cryptocurrency or other types of investments. The scammer builds trust with the victim through online communication, persuading them to invest more and more, until the scammer disappears with the victim’s money.

31. Upon information and belief, “Munoz Christopher Rorfrt” is not a real person, and instead is a false name submitted to the Secretary of State by the unknown individual(s) who organized the Fraudulent Neex.

32. At the time Neex LLC was organized, the Stout Street Address was owned by 1600 Stout LLC.

33. The Stout Street Address has been owned by 1600 Stout LLC and managed by 1600 Stout Management LLC since September 2024.

34. 1600 Stout Management LLC has the exclusive right to lease, manage, and sell the properties at the Stout Street Address.

35. Neither Defendant nor Rorfrt owned or leased office space at the Stout Street Address at the time the fraudulent Neex LLC was formed, nor is there evidence that Defendant or Rorfrt ever owned or leased office space at that location.

36. 1600 Stout LLC and 1600 Stout Management LLC did not consent to Defendant’s use of the Stout Street Address in its business filings.

37. There is no evidence that an individual named “Rorfrt” ever owned or occupied the Stout Street Address, including before 1600 Stout LLC managed this property.

38. There is no evidence that “Rorfrt” otherwise resided at the Stout Street Address or had permission to use this address in his business filings.

39. “Rorfrt” did not have permission to list or use the Stout Street Address as the principal office address or registered agent address for Neex LLC.

40. “Rorfrt” fraudulently organized Neex LLC in Colorado by falsely listing the Stout Street Address—the commercial address of Colorado businesses with no relationship to this entity—as Defendant Neex LLC’s principal office address and registered agent address.

41. Upon information and belief, Defendant Neex LLC was created for the sole purpose of deceiving consumers, including Colorado consumers, out of hundreds of thousands of dollars or more.

42. Neex LLC has remained an LLC within the Colorado Secretary of State registry.

43. Defendant Neex LLC was thus fraudulently organized with the Colorado Secretary of State through use of an unauthorized address and subsequently abused the authority conferred on it by law.

CLAIM FOR RELIEF

Judicial Dissolution Due to Obtaining Articles of
Organization Through Fraud and Abusing the
Authority Conferred Upon It By Law
Colo. Rev. Stat. §§ 7-80-810 & 7-80-813

44. Plaintiff incorporates by reference the allegations contained in Paragraphs 1 through 43 of this Complaint.

45. Through the above-described conduct, Defendant obtained its articles of organization through fraud and abused the authority conferred upon it by law.

46. Specifically, Defendant Neex LLC was organized using the Stout Street Address as its principal office address and registered agent address, when in fact Defendant had no association with that address.

47. The individual(s) who filed Defendant's organization papers then used the similarity of Defendant's business name to a legitimate entity to deceive consumers and unlawfully convert funds directed to the legitimate entity. Upon information and belief, the fraudulent Neex LLC was formed for this very purpose.

48. The continued existence of Defendant Neex LLC in Colorado allows for the possibility of this same scheme to be replicated with other consumers.

49. Because Defendant obtained its articles of organization through fraud and abused the authority conferred upon it by law, the Attorney General requests that this Court enter a decree dissolving Neex LLC, pursuant to Colo. Rev. Stat. sections 7-80-810(1)(a), 7-80-810(1)(b), and 7-80-813(1).

RELIEF REQUESTED

WHEREFORE, Plaintiff requests the following relief:

A. Pursuant to Colo. Rev. Stat. sections 7-80-810(1)(a), 7-80-810(1)(b), and 7-80-813(1), an Order entering a decree that dissolves Neex LLC.

B. Pursuant to Colo. Rev. Stat. section 7-80-813(2), an Order directing: (1) the winding up and liquidation of business and affairs in accordance with Colo. Rev. Stat. section 7-80-803 for Neex LLC; and (2) the giving of notice to claimants in accordance with Colo. Rev. Stat. sections 7-90-911 and 7-90-912.

Dated this 20th day of May, 2026.

PHILIP J. WEISER
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