

DISTRICT COURT, TELLER COUNTY,
COLORADO
101 W. Bennett Avenue
P.O. Box 997
Cripple Creek, Colorado 80813

DATE FILED
May 20, 2026 3:14 PM
FILING ID: 8322D4E0BD5E2
CASE NUMBER: 2026CV30051

PHILIP J. WEISER, ATTORNEY GENERAL, in his
official capacity,

Plaintiff,

v.

GARRETTFORU LIMITED LIABILITY COMPANY;
ACE POKER LLC; ADJACENT INC; ADVANCE
NETWORK TECHNOLOGY LLC; AESANMIN INC;
AETHERIUD LTD; AHMADTRAD INC;
ALLSTATES TRADE INC; ALTAINWEN INC;
ALTESSE INC; AMBERHUI INC; ANQIYE LLC;
ANTONETTE INC; APERITORCY INC; APEX
BRAND MANUFACTURING INC; APEX GLOBAL
SOURCING LLC; APPARON INC; ARGENT INC;
ARTYWEI INC; ASCENULLAH INC; ATLANTIC
BREWER INC; ATLANTIC HORIZON TRADING
CO INC; ATLAS SOURCE GROUP INC; AUREN
GROUP INC; AVERIN INC; AVERSOURUMCCY
INC; AVIRA GROUP LTD; BAIFENDI COMMERCE
AND TRADE CO., LIMITED; BARBELLZE INC;
BEAUTYSOLD INC; BLOOMKAI INC;
BLOVASTRAXUE INC; BLUEBRIDGE TRADING
CO.; BLUEPEAK TRADING LLC; BOLDER
INTERNATIONAL LIMITED; BORTHWICK INC;
BRAVOTAO INC; BREEZEWEN INC; BRIGHTLY
TRADING LLC; BRISTLEWU INC; BRYUTEYGIH
INC; BURSTEN INC; CALM ENTERPRISE LLC;
CARTIKIM INC; CASOTTHUI INC; CELESTIUM
INC; CENTIONS INC; CHENCAI TRADING
LIMITED; CHERHUA LLC; CHINEMIE INC;
CLARONJIE INC; CLASSICZU INC; CODEEDGE
INC; COLLETT TRADING LIMITED LLC;
COMMUNICATIONLIU INC; CONSILIO LLC;
COREZHIRO INC; CROSSLINK TRADING INC;
CRYPTOORBIT LTD; DAINTYBIRDH INC; DAMAI

TRADING CO., LTD; DARINIC INC; DAY PLUS INC; DEPARTURE INC; DETAILSAIT INC; DEWALLAH INC; DIVINITY INTERIORS INC; DONGYANG CITY FEILONG CAP CO., LTD.; EAGLEPORT INC; EASTBAY TRADING CO; ELEVEMIXGUI INC; ELITE BUREAU GROUP INC; ELYSIANSHI INC; ELYVIA INC; EMBER TRADE INC; EMERFOXZHAN INC; EMICREAHU INC; EQUINOX INC; ERSUMER INC; EVAQUINETTC INC; EVERGREEN TREE INC; EVERRISE TRADING LLC; FALLENFIRE INC; FAST SHIPPING INC; FEIDAO TECHNOLOGY CO., LTD; FINSTENCHAN INC; FIRMAMENT INC; FLONLIAO INC; FLUVIRIAN INC; FLUX NEURAL NETWORKS LLC; FORGEPAD LTD; FORTEZHI INC; FOSHAN CITY NANHAI DISTRICT MINGSHI NAJES TRADING FIRM LLC; FRAGRANCE VOYAGE US LLC; FRNITY INC; FTAEXCHANGE LTD; FULONG TRADING COMPANY CO__LTD; FULONG TRADING COMPANY INC; FUROLIE INC; FUSIONQUEST SERVICES INC; FUTIGLOBAL INC; FUTUREMATRIX LTD; FUTURETECH INC; FY BIO INC; GEARFLOW MACHINERY INC; GESTALT INC; GLOBAL BEST GOODS TRADING LLC; GLOBAL NEXUS INC; GLOBALEDGE LLC; GLOBERISE INC; GOICE LLC; GOLDBRID LLC; GOLDEN GALLOP INC; GOODTSL INC; GRANDAXIS LLC; GRAYSCALE LUMINARY INC; GRAYSLUMINARY INC; GREEN WALLFLOWER INC; GREENDAGGER INC; GTZEBEAN INC; GUANGZHOU HONGYI AUTO PARTS CO., LTD.; H&J BIOLOGY USA INC; HAOALLEYLI INC; HAWKEYE INC; HELORAAI LTD; HELVEXIN INC; HENGMINGSHUNCHENG MEDIA INC; HONGXINGLIAN BAG CO__LTD; HORIZONLINK LLC; HUNDRED LIONS INTERNATIONAL TRADE INC; HUSHAMANNCW INC; IMPACTLI INC; INNOPEPTIDE LTD.; JHT BUSINESS TRADE INC; JIAMA ENGINEERING MACHINERY CO__LTD; JING HONG INC; JINHUA FANYUE OUTDOOR PRODUCTS CO.,

LTD.; JINHUA FEIMA BAG CO., LTD; JINHUA HENGFA INDUSTRY CO., LTD.; JINHUA JUDE PACKAGING CO., LTD.; JINZHAI COUNTY BLOSSOM IMPORT AND EXPORT TRADING CO., LTD; JUMBLETONXIAN LLC; JX INTERNATIONAL TRADE COMPANY LLC; JYF METAL PRODUCTS CO., LTD.; KAILUN HARDWARE PRODUCTS LLC; KANGZHIYUAN LIMITED; KANZAKI LLC; KERIOR TRADING INC; KEYUE GLOBAL HOLDING LLC; KINSTARXU INC; KOKUTAN INC; LAPISENCUU INC; LAYERLI INC; LEATHERCHILD INC; LEDAUT LIMITED; LIBAI LLC; LIDA INDUSTRIAL USA INC; LINGHANGWEILAI CO., LTD; LINKAGE TRADE INC; LINVERSE INC; LIORA GLOBAL LLC; LOSIX INC; LUMENFLOW HAIR LLC; LUMICORE PRO BEAUTY CO., LTD; LUNAREX INC; LUXTRADE TRADING INC; LUXURY BRAND PRODUCTS CO., LTD; LY GLOBAL ERA INC; LYNXTRADE INTERNATIONAL INC; MAIN ORANGE INC; MAJORBRIGHT INC; MARGATEJIA INC; MATTERSUPPLY INC; MECHLINK MACHINERY CO., LTD; MEGAMART TRADING INC; MERIDIAN TRADE INC; MERIVON INC; MESAMUNDI INC; MINGLUX INC; MINGYUN BUSINESS TRADE INC; MOMOWO CO., LTD.; MONTYAN INC; MOODEYU INC; MOREAN SERVICES INC; MORTAR INC; MYRIADBYTES INC; NAPING LLC; NEOTRADE INC; NEXTWAVE IMPORTS LLC; NEXUS BROADCAST GROUP INC; NEXUS TRADE DYNAMICS INC; NIGHT SAILING SHIP INC; NINGBO BOTO TRADING CO., LTD.; NOLTR TRADING LIMITED; NONHALLHUA INC; NOVATECH SOLUTIONS INC; NOVATRADE CORP LLC; NOVAWORLD TRADE LLC; NOVELZONE INC; NOVERA TRADE INC; NOVO BATHWARE LLC; NUCLEAR HEAVY PROGRAMMING BIOTECHNOLOGY CO., LTD.; NUMMARIA INC; ONLYSOLD INC; ORCHILDJIE INC; ORIGIN EDGE STUDIO INC; ORION GLOBAL LLC; ORIYOUNGJIAN INC; OUFA

MACHINERY CO., LTD; PACIBIAJIA INC;
PANASIA TRADE INC; PANGECAI INC;
PANLAXU INC; PATARRONG INC; PAZIENTE
INC; PEAROCHRICHT INC; PILLOWPIX INC;
PILOTCONG INC; PINCLETRADE LTD; PIONMEI
INC; POIGNANT INC; POPOBUY IMPORT AND
EXPORT CO., LTD.; PORTALANTEC INC; PRIME
GATHERING INC; PRIME GATHERING TRADE
INC; PRIMEPORT GLOBAL INC; PRIMETRADE
INC; PUJIANG JINLETONG CRAFTS CO., LTD.;
PULMINLIN INC; PULSEMIST INC;
PUMPAGEGER INC; PURERPMG INC;
QINGTONG ENGINEERING MACHINERY CO.,
LTD.; QUANZHOU FENGZE DISTRICT
SHENGHESHENG TRADING CO., LTD.;
QUIESCENT INC; RACING AUTOMOTIVE
SUPPLY CO., LTD.; RADAR INC;
RADINATLUSSEX INC; RAIDENER INC; REULIN
INC; RICHIE PRO HK LIMITED; ROSETTE INC;
ROTHWALD INC; ROUNDPHASE INC; ROY
TRADING INC; RUNNING RIP INC;
SAUMONDYING INC; SAYAKAYU INC;
SCIGENHONG INC; SEKELIONASER INC; SENLI
IMPORTS INC; SHENGHESHENG CO., LTD;
SHENGKE INTERNATIONAL TRADING CO;
SHIMMARA INC; SHIOCEAN INC; SHUGUANG
AUDIO EQUIPMENT CO., LTD; SIDEFAN INC;
SILVER ENVELOPE INC; SILVER GUS INC;
SILVER YADDA INC; SIMPLE TRADING INC;
SIMUS GLOBAL LTD; SINAHONG INC;
SMITHLIU INC; SOLIVRA INC; SOLOYAO INC;
SOLRISE AUDIO INC; SOUTH MAPLE TRADING
LIMITED; SP PIONEER INTERNATIONAL
TRADE INC; SPARKAD CREATIVE CO.;
SPECIKEA LLC; STARLINK TRADING INC;
SUMMITTRADE CO; SUPER BRAIN LLC;
SURAMIEFKSH INC; SUTAI TRADING INC;
SWIFTDAIL TRADING INC; SY&DA TRADING
INC; TARGARYYI INC; TDGJ INC; TEHERAZHI
INC; TEHERLING INC; TENGRUI TRADING INC;
TERRANOVA IMPORTS LLC; TERRATRADE LLC;
TESPRO ELECTRONICS INC; THDAWEI INC;

THEVGPRO LTD; THIEKAYWEN INC;
THINGEYAO INC; THOON HEALTH USA INC;
TIANQING MACHINERY TRADING CO., LTD.;
TIERRAALQIN INC; TIGER PAY INC; TIME
WARNER INC.; TITANBRIDGE GLOBAL LLC;
TITANTRADE GROUP LLC; TORRONEY INC;
TOURMALICTT INC; TRADEAXIS
INTERNATIONAL INC; TRANSPACIFIC LINK
INC; TRENDMASSM INC; TRISYNCAUG INC;
TRISYN CJUL INC; TRISYN CSEP INC; TROTHIAN
INC; TULIP WINGS INC; TWELVESS INC; UMI
UMI TRADING CO., LTD; UNCOMMONGOODS
INC; UNIONGATE TRADING LLC; UNITEK
TRADING INC; VADASTRATTOG INC; VANTAGE
DYNAMICS INC; VASTROOTS TRADING LLC;
VELA SUMMIT INC; VELOCETRADE INC;
VERULUME INC; VERVE COMMERCE
INTERNATIONAL INC.; VESTRA GLOBAL INC;
VIANYONG INC; VILDIANCAI INC; VOYAGER
ENTERPRISES INC; VOYANT TRADE INC;
WAKOOL INC; WANGKING INC; WANGLOB
TLUCK CORP; WELLORA BIOTECH LLC;
WHITERIVERXU INC; WINDYUF INC;
WORDFIRELI INC; WUKONG TRADE INC;
XIAMEN FLUORESCENT HAOYUE TRADE CO.,
LTD; XIN NINE LIMITED; XINGHUO
MACHINERY TRADING INC.; XIWA LLC;
XIYANG MEDIA INC; XUANCHANG
CONSTRUCTION MACHINERY INC.; YALE
PROMO INC; YANFLOORS INC; YANGXIN INC;
YEDU LLC; YELLIGAECOT INC; YEOSSALLI
INC; YIDA TIANCHUANG CO., LTD. LLC; YIWU
GUUI E-COMMERCE CO., LTD; YIWU MEIDA
IMPORT AND EXPORT CO. LTD; YIWU OLD MAN
AND SEA CLOTHING CO., LTD.; YIWU ORANGE
LIGHT FUTURE TECHNOLOGY CO., LTD.; YIWU
POPOBUY IMPORT AND EXPORT CO., LTD.;
YIWU SIDAN E-COMMERCE CO., LTD.; YIWU
WANGLEI E-COMMERCE FIRM CO., LTD.; YIWU
YAMANZI COSMETICS CO., LTD.; YIWU YIZHEN
JEWELRY CO., LTD.; YIWU YUZHONG IMPORT
AND EXPORT CO., LTD.; YOUNGERDU INC;

<p>YOUNTED INC; YUNDUAN PURPLE POTTERY INC; YUNNANJIA INC; YUNXIANG TRADING CO., LTD.; YUNYIKUAJING INC; ZAZHENPAN INC; ZENITHBRIDGE LLC; ZEPHYRTECH LLC; ZHAOSHEN FOREIGN TRADE CO., LTD; ZHEJIANG GREEN HOME INDUSTRY & TRADE CO., LTD; ZHEJIANG JUPENG DRINKWARE CO., LTD; ZHENGZHOU COREY MACHINERY EQUIPMENT CO__ LTD; ZHENVAE INC; ZUNIVEBERSEO INC,</p> <p>Defendants.</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>PHILIP J. WEISER, Attorney General CONOR KRUGER, 54111* SARAH BARRON, 62530* Assistant Attorneys General NOAH HOFFMAN, 62387* Assistant Attorney General Fellow Ralph L. Carr Judicial Center 1300 Broadway, 9th Floor Denver, CO 80203 Telephone: (720) 508-6195 Conor.Kruger@coag.gov Sarah.Barron@coag.gov Noah.Hoffman@coag.gov *Counsel of Record</p>	<p>Case No.</p> <p>Div.:</p>
<p style="text-align: center;">COMPLAINT FOR JUDICIAL DISSOLUTION</p>	

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

INTRODUCTION

1. Theresa and Thomas (the Homeowners) have lived with their two adult children in their home in Cripple Creek since 2016. They have owned their home since 2021, and Thomas’s small business is registered at their home.

2. To the Homeowners’ and their children’s surprise, Thomas’s business is not the only one using the Homeowners’ address in its business filings. Rather, 370 other entities registered with the Colorado Secretary of State list the Homeowners’ home as either their principal place of business or the address of their registered agent in their business filings.

3. The entities using the Homeowners' address in their business filings purport to be involved in international trade,¹ ecommerce,² machinery,³ and biotechnology.⁴

4. The Homeowners have no connection to or association with these entities, and they did not consent to the use of their home address in these entities' business filings.

5. Because the Homeowners did not consent to the use of their address in these entities' business filings, each of the 370 entities obtained its articles of organization or incorporation or changed its status through fraud. *See* C.R.S. § 7-90-314. The Homeowners are victims of this fraud—their address seemingly having been picked out of the phonebook to use in filings with the Secretary of State.

6. The Homeowners are not the only victims of this fraud. The Secretary of State has received complaints about 53 of the 370 entities. Each of the 53 complaints, submitted by other Coloradans, states that the entity at issue also lists, in addition to the Homeowners' address, the complainant's home address in the entity's business filings, without that complainant's knowledge or consent.

7. Colorado consumers are also victims of this fraud. Coloradans use the Secretary of State's corporate registry to confirm the validity of the businesses they encounter and to identify where to address questions, concerns, demands, or legal process.

8. Fraudulent business filings can be dangerous tools in the hands of bad actors. The veneer of legitimacy provided by a registered corporation or limited liability company (LLC) can be used to deceive consumers into transacting with, including extending credit to, a business that has supplied false information. And if a business filing is fraudulent, a consumer may be unable to contact the business with concerns or legal process.

9. To help combat the problem of fraudulent business filings and to protect both Colorado homeowners and consumers, the Colorado General Assembly passed SB 22-034 to enable the Secretary of State and Attorney General to take coordinated administrative action against fraudulent business filings. Under this law, including an address in a document filed with the Secretary of State without

¹ Examples include Hundred Lions International Trade INC, Shengke International Trading Co., and JX International Trade Company LLC.

² Examples include Yiwu Wanglei E-Commerce Firm Co., ltd. and Yiwu Sidan E-Commerce Co., Ltd.

³ Examples include Mechlink Machinery Co., Ltd. and Gearflow Machinery Inc.

⁴ Examples include Wellora Biotech LLC and Nuclear Heavy Programming Biotechnology Co., Ltd.

the consent of the owner or occupant of that address constitutes a deceptive trade practice actionable by the Attorney General. C.R.S. §§ 6-1-103, -105(1)(ppp).

10. Defendant Garrettforu Limited Liability Company (“Garrettforu”) is one of the 370 entities fraudulently listing the Homeowners’ address in its business filings. Specifically, Garrettforu was formed with the Homeowners’ address as its principal street and registered agent address. Because the Homeowners did not consent to Garrettforu’s use of their address, Garrettforu obtained its articles of organization through fraud.

11. Garrettforu is also the registered agent for the other 369 Defendant entities named in this Complaint, each of which fraudulently listed the Homeowners’ address in its business filings. Specifically, each Defendant entity falsely lists the Homeowners’ address, without consent, as the address of its registered agent. Thus, each Defendant entity obtained its articles of organization or incorporation, or otherwise changed its business status, through fraud.

12. The Attorney General asks this Court to judicially dissolve Garrettforu and each of the 369 Defendant entities that lists Garrettforu as its registered agent and the Homeowners’ address as its registered agent address.

13. Pursuant to C.R.S. §§ 7-114-301(1)(a) and 7-80-810(1)(a), this Court has jurisdiction to dissolve a Colorado corporation or LLC if the Attorney General establishes that the corporation or LLC obtained its articles of incorporation or organization through fraud.

14. Likewise, under the Colorado Consumer Protection Act (“the CCPA”), this Court has broad authority to issue orders to protect the Homeowners, other Colorado homeowners, and Colorado consumers from deceptive trade practices such as fraudulent business filings. *See* C.R.S. § 6-1-110(1).

PARTIES

15. Plaintiff Philip J. Weiser is the duly elected Attorney General of the State of Colorado and is authorized under C.R.S. § 6-1-103 to enforce the CCPA.

16. The Attorney General is also authorized under C.R.S. § 7-80-810(1) to initiate proceedings to dissolve LLCs that obtained their articles of organization through fraud or are exceeding or abusing the authority conferred upon them by law.

17. Lastly, the Attorney General is authorized under C.R.S. § 7-114-301(1) to initiate proceedings to dissolve corporations that obtained their articles of incorporation through fraud or are exceeding or abusing the authority conferred upon them by law.

18. Defendant Garrettforu Limited Liability Company is registered with the Colorado Secretary of State. This entity lists its principal office address and registered agent address as the Homeowners' address, 210 W Carr Avenue, Cripple Creek, Colorado 80813 ("Carr Avenue Address").

19. Garrettforu was formed on September 19, 2024. In its articles of organization, it listed the Carr Avenue Address as its principal office street address and registered agent's street address.

20. On April 17, 2025, Garrettforu submitted a statement of change form with the Colorado Secretary of State, changing the name of its registered agent. On the form, Garrettforu again listed the Carr Avenue Address as the address of its registered agent.

21. Since Garrettforu was formed, 369 entities, all Defendants named in this Complaint, have either listed Garrettforu as their registered agent in their articles of organization or incorporation or changed their registered agent information to list Garrettforu as their registered agent.

22. Consequently, Garrettforu is currently the registered agent for the other 369 Defendant entities. Each entity is registered with the Secretary of State, and the Homeowners' Carr Avenue Address is listed as the registered agent's address.

JURISDICTION AND VENUE

23. Pursuant to C.R.S. § 6-1-110(1), this Court has jurisdiction to "make such orders or judgments as may be necessary to prevent the use or employment by [a] person of any . . . deceptive trade practice or that may be necessary to completely compensate or restore to the original position of any person injured by means of any [deceptive trade] practice or to prevent any unjust enrichment by any person through the use or employment of any deceptive trade practice."

24. Pursuant to C.R.S. § 7-80-810(1)(a), this Court has jurisdiction to dissolve Colorado LLCs if the Attorney General establishes that the LLC has obtained its articles of organization through fraud or that the LLC has exceeded or abused the authority conferred upon it by law.

25. Pursuant to C.R.S. § 7-114-301(1), this Court has jurisdiction to dissolve Colorado corporations if the Attorney General establishes that the corporation has obtained its articles of incorporation through fraud or that the corporation has exceeded or abused the authority conferred upon it by law.

26. Venue is proper in Teller County District Court under C.R.S. § 6-1-103, which states that actions instituted pursuant to C.R.S. § 6-1-110(1) “may be brought in the county where an alleged deceptive trade practice occurred or where any portion of a transaction involving an alleged deceptive trade practice occurred, or in the county where the principal place of business of any defendant is located, or in the county in which any defendant resides.” Here, Defendant Garrettforu’s principal place of business is listed as the Carr Avenue Address, located in Teller County, and Garrettforu and each of the other 369 Defendant entities fraudulently list the Carr Avenue Address as the address of their registered agent. Thus, the alleged deceptive trade practice occurred at the Carr Avenue Address, and venue is proper in Teller County.¹

RELEVANT TIMES

27. The conduct that gives rise to the claims in this Complaint began in July 2022 and continues through the present.

STATUTORY BACKGROUND

28. The Colorado Corporations and Associations Act (“the CCAA”) sets forth procedures for filing documents to form and change LLCs and corporations. *See* C.R.S. §§ 7-90-301 – 814.

29. The CCAA provides that “[i]ncluding an address in a document filed in the Secretary of State’s office under this part 3 [of the CCAA] without the consent of

¹ Venue is also proper in Teller County District Court pursuant to C.R.S. § 7-80-811(1), which states that “[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 address of Garrettforu’s principal office and registered agent (the Carr Avenue Address) is located in Teller County. The address of all other Defendants’ registered agent is located in Teller County. Venue is also proper under C.R.S. § 7-114-302(1), which states that “[a] proceeding by the attorney general to dissolve a corporation shall be brought in the district court for the county in this state in which the street address of the corporation's principal office or the street address of its registered agent is located[.]” Here, each of the 370 entities, 322 of which are corporations, list the Carr Avenue Address, located in Teller County, as the address of their registered agent.

the owner of or occupant of the included address” constitutes a fraudulent act. C.R.S. § 7-90-314(1)(b).

30. The Colorado Consumer Protection Act (“the CCPA”) further provides that a person engages in a deceptive trade practice when the person “[v]iolates section 7-90-314(1)[.]” C.R.S. § 6-1-105(ppp).

31. Additionally, the CCPA states that a person engages in a deceptive trade practice when the person “[e]ither knowingly or recklessly engages in any unfair, unconscionable, deceptive, deliberately misleading, false, or fraudulent act or practice[.]” C.R.S. § 6-1-105(rrr).

32. When the Attorney General has cause to believe that a person has engaged in any deceptive trade practice, the CCPA empowers the Attorney General to apply for and obtain a temporary restraining order or injunction, and “[t]he court may make such orders or judgments as may be necessary to prevent the use or employment by the person of any such deceptive trade practice or that may be necessary to completely compensate or restore to the original position of any person injured by means of any such practice or to prevent any unjust enrichment by any person through the use or employment of any deceptive trade practice.” C.R.S. § 6-1-110(1).

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

34. The CLLCA 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).

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

36. The Colorado Business Corporation Act (“the CBCA”) sets forth the procedure for judicial dissolution of a corporation. *See* C.R.S. §§ 7-114-101 – 401.

37. The CBCA provides that a corporation may be dissolved in a proceeding by the Attorney General if it is established that the corporation obtained its articles of incorporation through fraud or if the corporation has continued to exceed or abuse the authority conferred upon it by law. *See* C.R.S. § 7-114-301(1)(a) and (b).

38. In such a proceeding, the Court may, after a hearing, determine that “one or more grounds for judicial dissolution described in section 7-114-301 exist” and enter a decree dissolving the corporation. C.R.S. § 7-114-304(1).

39. After the court enters a decree dissolving an LLC or a corporation, the Clerk of the Court shall then deliver a certified copy of the decree to the Secretary of State for filing. *See* C.R.S. § 7-80-813(1) (LLCs); C.R.S. § 7-114-304(1) (corporations).

40. After the Court enters the decree, “the court shall direct the winding up and liquidation of the [LLC’s or corporation’s] business and affairs in accordance with [C.R.S. § 7-80-803 (LLCs) or C.R.S. § 7-114-105 (corporations)] 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); C.R.S. § 7-114-304(2).

GENERAL ALLEGATIONS

41. Garrettforu was organized with the Colorado Secretary of State on September 19, 2024. The articles of organization identified the Carr Avenue Address as the principal office street and mailing address, registered agent’s street and mailing address, address of the person forming the LLC, and address of the individual causing the document to be delivered for filing. The articles listed “JIAFENG FANG” as the registered agent, person forming the LLC, and individual causing the document to be delivered for filing.

42. At the time Garrettforu was organized and at all times since, the Carr Avenue Address was owned and occupied by the Homeowners.

43. Until receiving a letter referencing Garrettforu, neither the Homeowners nor any other resident of the Carr Avenue Address had heard of Garrettforu. Nor did the Homeowners nor any other resident of the Carr Avenue Address consent to use of the Carr Avenue Address in Garrettforu’s business filings.

44. Until approached by an investigator from the Colorado Attorney General’s Office, neither the Homeowners nor any other resident of the Carr Avenue Address had ever heard of any person by the name of JIAFENG FANG.

45. There is no evidence that anybody by the name of JIAFENG FANG has ever resided or transacted business at the Carr Avenue Address. Nonetheless, the Carr Avenue Address was used to register Garrettforu with the Colorado

Secretary of State, and JIAFENG FANG was listed as the registered agent and person forming the LLC.

46. Thus, JIAFENG FANG did not have permission to list or use the Carr Avenue Address as the principal office address or registered agent address for Garrettforu LLC.

47. On April 17, 2025, Garrettforu's registered agent information was changed when a Statement of Change form was filed with the Colorado Secretary of State. The Statement of Change form listed XIANNA LU as the new registered agent and as the person causing the form to be delivered for filing. The Statement of Change form again listed the Carr Avenue Address as the registered agent's street and mailing address and as the address of the person causing the form to be delivered for filing.

48. Until approached by an investigator from the Colorado Attorney General's Office, neither the Homeowners nor any other resident of the Carr Avenue Address had ever heard of any person by the name of XIANNA LU.

49. There is no evidence that anybody by the name of XIANNA LU has ever resided or transacted business at the Carr Avenue Address. Nonetheless, XIANNA LU was listed as the new registered agent on the Statement of Change form and the Carr Avenue Address was again listed as the registered agent's address with the Colorado Secretary of State.

50. XIANNA LU therefore did not have permission to list or use the Carr Avenue Address as the registered agent address for Garrettforu LLC.

51. In the time since Garrettforu LLC was formed on September 19, 2024, 47 limited liability companies and 322 corporations, totaling 369 entities, have either (1) been formed with the Colorado Secretary of State with Garrettforu as the registered agent and the Carr Avenue Address as the registered agent's address or (2) had their registered agent changed through a Statement of Change form filed with the Colorado Secretary of State to make Garrettforu the registered agent and the Carr Avenue Address the registered agent's address.

52. Until approached by an investigator from the Colorado Attorney General's Office, neither the Homeowners nor any other resident of the Carr Avenue Address had heard of any of these 369 entities. Nor did the Homeowners or any other resident of the Carr Avenue Address consent to use of the Carr Avenue Address in any of the 369 entities' business filings.

53. Thus, neither Garrettforu nor any of the 369 other Defendant entities had permission to list or use the Carr Avenue Address as their registered agent address.

54. Of the 369 entities, 11 were formed before Garrettforu was formed (with the first being formed on July 26, 2022 and the last being formed on September 13, 2024) and 358 were formed after Garrettforu was formed (with the first being formed on October 11, 2024 and the last being formed on November 21, 2025, an average of almost one new entity per day).

55. Of the 358 entities formed after Garrettforu was formed, the vast majority listed Garrettforu as the registered agent and the Carr Avenue Address as the registered agent's address in their original articles of organization or incorporation.

56. Of the 369 entities, 366 list their principal office street addresses as apparently random Colorado addresses. Another lists its principal office street address as a Texas address, one as a Nevada address, and one as an Alabama address. Of the 366 principal office street addresses listed in Colorado, only nine are duplicates, meaning that the 369 entities list 357 unique Colorado addresses as their principal office street addresses. Most but not all of the 357 unique Colorado addresses are residential addresses.

57. The Secretary of State has received complaints about 53 of the 369 Defendant entities that list Garrettforu as the registered agent and the Carr Avenue Address as the registered agent's address. Each of the complaints states that the entity lists the complainant's home address as the entity's principal office street and mailing address without the complainant's knowledge or consent.

FIRST CLAIM FOR RELIEF

Judicial Dissolution of Garrettforu LLC Due to
Obtaining Articles of Organization Through
Fraud and Abusing the Authority Conferred
Upon It by Law

C.R.S. §§ 7-80-810(1) and 7-80-813(1)

58. Plaintiff incorporates by reference the allegations contained in Paragraphs 1 through 57 of this Complaint.

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

60. Specifically, Garrettforu was organized using the Carr Avenue Address as its principal office address and registered agent address, when, in fact, Garrettforu had no association with that address.

61. Garrettforu was then listed as the registered agent for 369 other entities, each of which listed the Carr Avenue Address as its registered agent address, when, in fact, the entities had no association with that address.

62. The continued existence of Garrettforu in Colorado allows for the possibility of even more entities being fraudulently created with Garrettforu as the registered agent and the Carr Avenue Address as the registered agent's address.

63. Because Garrettforu 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 Garrettforu Limited Liability Company, pursuant to C.R.S. §§ 7-80-810(1)(a), 7-80-810(1)(b), and 7-80-813(1).

SECOND CLAIM FOR RELIEF

Judicial Dissolution of All Defendant Entities
that Listed Garrettforu LLC as the Registered
Agent and the Carr Avenue Address as the
Registered Agent's Address on their Articles of
Organization or Incorporation, Due to Obtaining
Articles of Organization or Incorporation Through
Fraud and Abusing the Authority Conferred
Upon Them by Law
C.R.S. §§ 7-80-810(1), 7-80-813(1), 7-114-301(1),
and 7-114-304(1)

64. Plaintiff incorporates by reference the allegations contained in Paragraphs 1 through 63 of this Complaint.

65. Through the above-described conduct, all Defendant entities that listed Garrettforu as the registered agent and the Carr Avenue Address as the registered agent's address on their articles of organization or incorporation obtained their articles of organization or incorporation through fraud and abused the authority conferred upon them by law.

66. Specifically, each of these entities was organized or incorporated using the Carr Avenue Address as its registered agent address, when in fact it had no association with that address.

67. According to complaints filed with the Secretary of State, many of these entities also listed private residential Colorado addresses as their principal office addresses without the consent of the owners of or occupants of the included address.

68. The continued existence of these entities in Colorado allows for private residential addresses, including the Carr Avenue Address, to be used by business entities without the consent of the owners and occupiers of those addresses.

69. Because each Defendant entity obtained its articles of organization or incorporation through fraud and abused the authority conferred upon it by law, the Attorney General requests that this Court enter a decree dissolving each Defendant entity that listed Garrettforu Limited Liability Company as the registered agent and the Carr Avenue Address as the registered agent's address on its articles of organization or incorporation, pursuant to C.R.S. §§ 7-80-810(1)(a), 7-80-810(1)(b), 7-80-813(1), 7-114-301(1)(a), 7-114-301(1)(b), and 7-114-304(1).

THIRD CLAIM FOR RELIEF

Judicial Dissolution of Garrettforu LLC and All
Entities that List Garrettforu LLC as the
Registered Agent and the Carr Avenue Address
as the Registered Agent's Address on Filings in
the Secretary of State's Office Due to Knowingly
or Recklessly Engaging in a Fraudulent Act
C.R.S. §§ 7-90-314(1)(b), 6-1-105(ppp) and (rrr),
and 6-1-110(1)

70. Plaintiff incorporates by reference the allegations contained in Paragraphs 1 through 69 of this Complaint.

71. Through the above-described conduct, all entities that listed Garrettforu as the registered agent and the Carr Avenue Address as the registered agent's address on documents filed with the Secretary of State engaged in a fraudulent act.

72. Specifically, Garrettforu and all entities that listed Garrettforu as the registered agent and the Carr Avenue Address as the registered agent's address on

documents filed with the Secretary of State used the Carr Avenue Address as their registered agent address without the consent of the owner of or occupant of the included address.

73. Thus, Garrettforu and each entity that listed Garrettforu as the registered agent and the Carr Avenue Address as the registered agent's address on documents filed with the Secretary of State engaged in a deceptive trade practice.

74. The continued existence of these entities in Colorado allows for private residential addresses, including the Homeowners' Carr Avenue Address, to be used by business entities without the consent of the owners and occupiers of those addresses.

75. The dissolution of these entities will restore to the State its original position before Garrettforu and the other Defendant entities' conduct alleged in this action, as well as prevent unjust enrichment to each entity.

76. Because Garrettforu and the other Defendant entities engaged in a deceptive trade practice, the Attorney General requests that this Court enter a decree dissolving Garrettforu and each Defendant entity pursuant to C.R.S. § 6-1-110(1).

RELIEF REQUESTED

WHEREFORE, Plaintiff requests the following relief:

- A. Pursuant to C.R.S. §§ 7-80-810(1)(a), 7-80-810(1)(b), and 7-80-813(1), an Order entering a decree that dissolves Garrettforu Limited Liability Company.
- B. Pursuant to C.R.S. § 7-80-813(2), an Order directing: (1) the winding up and liquidation of business and affairs in accordance with C.R.S. § 7-80-803 for Garrettforu Limited Liability Company; and (2) the giving of notice to claimants in accordance with C.R.S. §§ 7-90-911 and 7-90-912.
- C. Pursuant to C.R.S. §§ 7-80-810(1)(a), 7-80-810(1)(b), 7-80-813(1), 7-114-301(1)(a), 7-114-301(1)(b), and 7-114-304(1), an Order entering a decree that dissolves each Defendant entity that listed Garrettforu Limited Liability Company as the registered agent and the Carr Avenue Address as the registered agent's address on its articles of organization or incorporation.

D. Pursuant to C.R.S. §§ 7-80-813(2) and 7-114-304(2), an Order directing: (1) the winding up and liquidation of business and affairs in accordance with C.R.S. §§ 7-80-803 and 7-114-105 for each Defendant entity that listed Garrettforu Limited Liability Company as the registered agent and the Carr Avenue Address as the registered agent's address on its articles of organization or incorporation; and (2) the giving of notice to claimants in accordance with C.R.S. §§ 7-90-911 and 7-90-912.

E. Pursuant to C.R.S. § 6-1-110(1), an Order entering a decree that dissolves Garrettforu LLC and each Defendant entity that listed Garrettforu LLC as the registered agent and the Carr Avenue Address as the registered agent's address on documents filed with the Secretary of State.

F. Pursuant to C.R.S. § 6-1-110(1) and in accordance with the Judicial Dissolution processes available to the Attorney General in Title 7, C.R.S. §§ 7-80-809 to 7-80-813 and 7-114-301 to 7-114-305, an Order directing: (1) the winding up and liquidation of business and affairs in accordance with C.R.S. §§ 7-80-803 and 7-114-105 for Garrettforu LLC and each Defendant entity that listed Garrettforu Limited Liability Company as the registered agent and the Carr Avenue Address as the registered agent's address on documents filed with the Secretary of State; and (2) the giving of notice to claimants in accordance with C.R.S. §§ 7-90-911 and 7-90-912.

Dated this 20th day of May, 2026.

PHILIP J. WEISER
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