

CITY AND COUNTY OF DENVER
DISTRICT COURT
1437 Bannock Street
Denver, CO 80202

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May 20, 2026 12:09 PM
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CASE NUMBER: 2026CV31833

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

Plaintiff,

v.

3607-2199 HY LIMITED, 3607-2199 HY LIMITED;
7DIM SPACE GAMES STUDIO; 9LINK LIMITED;
A&T INTERNATIONAL (GROUP) CO.,LTD;
A.SHINE INC; A2Z INC; ABARTH TRADING CO.,
LTD; ABC RESOURCES LLC; ABESTEL
INTERNATION INC; ABMED SERVICE INC;
ABOUTCHINA LTD; ACELUFly TRADING CO.,
LTD.; ACEMATE ROBOTICS INC.; ACME HOME
DECO CO.,LTD; ACOLIFE INC; ACRADING
TRADING CORPORATION; ADAMAN DOORS
AND WINDOWS SYSTEM (USA) INC; ADDWIN
INC.; ADOREARTISANS INC.; AFIL DIGITAL
ASSET FUND LTD; AI HUI NOVA TRADING INC;
AIDEMENG LTD.; AIKOFUL GLOBAL INC;
AINSNBOT LLC; AIOUNIYA TRADE LTD.;
AIRLAND (USA) GROUP SMART HOME CO., LTD;
AIRTEX SPORTS LIMITED; AIYI MOBI US
LIMITED; AK TRADING CO., LTD.; AL
INTERNATIONAL TRADE CO., LIMITED; AL
STUDIO INC; ALASKA TRADING LTD; ALCATEL
TRADING CO., LTD; ALFA INTERNATIONAL
TRADING CO., LTD; ALL WHALE WASHING
DAILY CHEMICAL RESEARCH INSTITUTE CO.,
LTD; ALLMAY CO., LTD; ALOK; A-LTM LIGHT
MEDICAL MANUFACTURING TECHNOLOGY
Co., LTD.; AMBER TECHNOLOGY CO., LTD;
AMERCAIN R8 FOUNDATION; AMERCIAN BYDK
FOUNDAITON; AMERCIAN DAOPORT
FOUNDATION; AMERCIAN MANGAVERSE
FOUNDATION; AMERCIAN WEB3 FRENS
FOUNDATION; AMERICA ALISHI PETROLEUM

▲ COURT USE ONLY ▲

INTERNATIONAL GROUP LTD; AMERICA
AMAZON ENERGY GROUP CO., LIMITED;
AMERICA APG INC.; AMERICA APVIS INC;
AMERICA BAJA TIRE HOLDINGS LTD;
AMERICA BIOCHEMISTRY RESEARCH
ASSOCIATION; AMERICA LACE GROUP
FURNITURE CO.,LTD; AMERICA
MULTICULTURAL FUSION DEVELOPMENT
FOUNDATION LTD.; AMERICA RED CARD
FUTURE AGRICULTURAL INC.; AMERICA
SERTA BEDDING (GROUP) CO., LIMITED;
AMERICA SIMMONS FURNITURE PRODUCTS
GROUP CO., LIMITED; AMERICA TIKIKO
TECHNOLOGY CO., LTD; AMERICA TIMES
PLANNING ARCHITECTURAL DESIGN CO., LTD;
AMERICA TOP SPORT TECHNOLOGY GROUP
INC.; AMERICA YEW TECHNOLOGY GROUP
LIMITED; AMERICA ZHONGLUBAO
TECHNOLOGY CO., LTD; AMERICAN SETTLO
INDUSTRIAL GROUP CO., LTD.; AMERICAN
AASM ACADEMY OF SLEEP MEDICINE;
AMERICAN ACADEMY OF SLEEP MEDICINE;
AMERICAN AEGIS PETROLEUM CHEMICAL
INDUSTRY CO., LTD; AMERICAN AGONEIR
FASHION CO., LTD; AMERICAN AI LAIDE
ANIMAL HUSBANDRY TECHNOLOGY LIMITED;
AMERICAN ALLIANCE INTERNATIONAL
INVESTMENT GROUP CO., LTD; AMERICAN
ANGNUOSHENGKE TOOLS INTERNATIONAL
LLC; AMERICAN ANTORFER HOLDING CO.,
LTD; AMERICAN BARCELONA MEDICAL
RESEARCH INSTITUTE CO., LTD.; AMERICAN
BLUE FLAG MODERN SCIENCE AND
TECHNOLOGY DEVELOPMENT LTD;
AMERICAN BORUNNI ENVIRONMENTAL
TECHNOLOGY CO., LIMITED; AMERICAN
BRIGHTON SEALING ENGINEERING INC;
AMERICAN CAT COMPANY; AMERICAN
CERTIFICATION INSTITUTE CENTER;
AMERICAN CERTIFICATION INTERNATIONAL
CENTER; AMERICAN COLORADO GENE CELL
ENGINEERING INSTITUTE; AMERICAN

DEBERGONG BEARING GROUP CO., LTD.; AMERICAN DESLEEP HEALTH TECHNOLOGY CO., LTD.; AMERICAN DIGITAL MARKETING ASSOCIATION; AMERICAN DUKE NANOMETER TECHNOLOGY CO.,LTD; AMERICAN FINANCIAL EXCHANGE CO.,LTD; AMERICAN FRED ENVIRONMENTAL PROTECTION GROUP CO.,LTD; AMERICAN FREDERICK HUMAN SLEEP RESEARCH AND DEVELOPMENT CENTER; AMERICAN GIANT INC.; AMERICAN HOLLYWOOD FILM ACADEMY; AMERICAN INNOVATIVE RESEARCH LIMITED; AMERICAN INTERNATIONAL EDUCATION CONSULTING ASSOCIATION; AMERICAN INTERNATIONAL INVESTMENT GROUP CO., LTD; AMERICAN INTERNATIONAL TRUST BANK CO.,LTD; AMERICAN LIN'S INDUSTRIAL INVESTMENT CO. , LIMITED; AMERICAN MAOXIANG INTERNATIONAL TRADE INC; AMERICAN MICHELLE TRADING CO., LTD.; AMERICAN NAMIRA INTERNATIONAL METAL SMART HOME PRODUCTS CO., LTD.; AMERICAN OMCCANN GROUP CO., LTD.; AMERICAN PHOTOGRAPHERS ASSOCIATION; AMERICAN PHYSICAL FITNESS IN WATER ASSOCIATION; AMERICAN RIP AGRICULTURAL CHEMICAL GROUP; AMERICAN ROCKBOARD CASA CO., LTD; AMERICAN SENLORDON HOME CO., LTD; AMERICAN SIMMONS GROUP; AMERICAN SIMMONS GROUP HOME INDUSTRY CO., LIMITED; AMERICAN SIMMONS GROUP LLC; AMERICAN SKY STAR TECHNOLOGY CO.,LTD.; AMERICAN STA NINI COMPRESSOR INTELLIGENT EQUIPMENT CO., LTD.; AMERICAN STOCK EXCHANGE CO.,LTD; AMERICAN STYLISH MATERIALS CO. , LIMITED; AMERICAN THOMSON FILTRATION INDUSTRY CO., LTD; AMERISMILE INC; ANACONDA DESIGN; ANCAS TRADING INC.; ANCORDA ELE INC; ANDANB INC.; ANDERSON TRADING INC; ANDREW W. MELLON FOUNDATION; ANNA GU LIMITED; ANNAWISE

LIMITED; ANRAFASHION US RETAIL INC; ANT TRADING CO., LTD; ANTERBOW TECH INC; ANUNNAKI MEDIA LLC; AOES INC; AOMIZH INC; APEX EBIKE INC.; AQUA FINA INTERNATIONAL TRADE INC.; ARCTON INC; ARISSAIR INTERNATIONAL INC; ARMAF INC; ARMANI (CHINA) MONOPOLY CO., LTD.; ARNOLD TRADING CO., LTD; ARTSDEKOKO DIGITAL TRADING COMPANY INC.; ARTT; ASHLEY&PLUM EDUCATION INC.; ASIA PACIFIC ACTIVITIES EXECUTIVE ALLIANCE; ASIA PACIFIC INNOVATIVE ENTERPRISE EQUITY EXCHANGE LLC; ASIAN COLLEGE OF LAW AND BUSINESS; ASIAN MAX WEALTHY LIMITED; ASSASSIN TRO&COMPLAIN INC; ASTRAL AUTO ACCESSORIES CO., LTD; ATHERSTONE BIO-SCIENCE INC; ATHOME INC; ATLAS AUTO CO.,LTD.; ATX INTERNATIONAL INC; AURORAVVIP CLOTHING CO., LTD; AUSFIT MART LTD; AUTERLON LIMITED; AVENISA CORP; AWESOME SECURITY LLC; AWEYU TRADE INC; AXE HEAD TRO&COMPLAIN INC; AYLIORUY TECHNOLOGY INC; BABY-CARE DESIGN RESEARCH CENTER; BADGE COLLECTION USA; BAICHEM INC; BAIMING GROUP CO., LTD.; BAKATATOYZ INC.; BAMBOOTECH INC; BANCO INTERNATIONAL LTD; BANNINGER&BANFF VALVE MANUFACTURING CO., LTD; BAOCHENG INC; BAOJI (USA) GROUP CO., LTD.; BAQOU TRADE INC; BATFOX TECHNOLOGY INC; BAYBANNFA LTD; BAYONET TRO&COMPLAIN INC; BAYSRAY LIMITED; BBING TRADING CO., LTD; BBT INC; BEELINK COMMERCE INC.; BEICHEN LTD.; BEIMING TIANCHI INC.; BERISCOIN LTD; BERNARD TRADING INC; BEST ALLERGY PREVENTION CORP; BEST DRINKING INC; BESTAR HOSPITALITY INC.; BESTMAE GLOBAL INC; BESTON PHARMACEUTICAL (USA) CO., LIMITED; BESTVALUE LTD; BESTWELL LIMITED; BESTWIN TOOLS. INC; BESYBATH

INC; BEYOND TRADING CO., LTD; BGF ASSET FUND LTD; BIAOBANG CAR CARE INDUSTRY INC; BICYMOTO LTD; BIGO LIMITED; BIGTREE AMERICA LLC; BININBOX INTERNATIONAL INC.; BINING ZHAO INC; BIRDS OF AURORA LTD; BIRDS OF COLORADO LTD; BIRDS OF DENVER LTD; BIRDZ INC; BIT TIMES; BITFLY TECHNOLOGY COMPANY LIMITED; BITFUT LIMITED; BITPLUS USA INC; BITTER SWEET INC; BITTRADE TECHNOLOGY LTD.; BITWIRED LTD; BLACKROCK INFORMATION LTD; BLACKSTONE FX LTD; BLANCE AUDIO ELETRONIC TECHNOLOGY INC; BLICSHYF TRADING INC.; BLOBBYCRAFT INC.; BLOOM TRADING LTD.; BLUE MOON LTD; BLUE SEAHORSE INC.; BLUE STARLIGHT TECHNOLOGY US LIMITED; BLUE SUNSHINE INC; BLUE WHALE TIMES US LIMITED; BLUZOR DIGITAL ASSET EXCHANGE LTD; BMEX GLOBAL CO., LTD.; BOB FOUNDATION; BODATU SHOES AND CLOTHING LTD.; BODI TARDING USA CORPORATION; BOLISS FURNITURE DESIGN CO.,LTD; BOLLINCOLN AUTOMATION CONTROL EQUIPMENT CO., LTD.; BOM LINKS INC; BORRITT LIMITED; BORUT TRADING CO., LTD; BOSIKE (ZHEJIANG) TECHNOLOGY CO., LTD; BOSTER TRADING CO., LTD.; BOTHAN MOBILE US LIMITED; BOWSLEGEND COMPANY, LLC; BOXI INTERNATIONAL TRADE INC.; BOZAN MOBILE US LIMITED; BOZIU TRADE INC; BRAIN HEALTH RESEARCH INSTITUTE LTD.; BREDA DEVICE CO., LTD; BREEZE WORLDWIDE INC; BREITLING PRIME LTD; BROKING INC; BROTUMN TRADE LTD; BSC AMERICA INC; BTOK FOUNDATION; BUBBLE CO., LIMITED; BULGE GROUP INVESTMENTS LIMITED; BUNI GLOBAL LTD.; BURKET FLUID CONTROL SYSTEM CO., LTD.; BUSINESS SCHOOL OF KARST UNIVERSI TY OF TECHNOLOGY; BUSY AROUND TRADING CO., LTD; BWCX TRADE LTD; BZONE TECHNOLOGY LTD.; C WEI GROUP

INC; C&Z AUDIO CO., LTD; C.RITCHIE
MACHINES CO., LTD.; CACTUS TRADING INC;
CAIHUA INC; CAINO INTERNATIONAL INC.;
CALARIO TRADING INC.; CALENA LIMITED;
CAMELLIA IMPORT AND EXPORT INC;
CAMELLIA LIMITED; CANABOME AUCTION
COMPANY; CANABOME AUCTION COMPANY;
CANADIAN SULFUR RESEARCH INSTITUTE
CO., LTD; CANDOR DEVICE CO., LTD; CAR
COME FOUNDATION LTD; CARICA INC; CARME
TRADING INC; CASKAR TRADING CO., LTD;
CATALK. LLC; CATHAY VORTEX LIMITED;
CCARTPAINTING INC; CD PRINTING INC.;
CDXCOIN LTD; CEA INDUSTRIAL INC;
CENTRAL EASTBAND TRADING
CORPORATION; CENTURYWAY HOME INC;
CERNER (US) HEALTH MANAGEMENT CO.,
LTD.; CFTEG USA INC; CHAIN SHANG WORLD
US LNC; CHAINWIN; CHANGYI USA INC;
CHAOKI TRADING INC.; CHARMCORNER INC;
CHC PLUS CO., LTD; CHEERS CORPORATION;
CHENGGONG OVERSEAS E-COMMERCE
LIMITED; CHENGZI OVERSEAS E-COMMERCE
LIMITED; CHEUNG FAMILY FOUNDATION;
CHIADO TECHNOLOGY CO., LTD; CHIN UP
FASHION INC.; CHINA CITIZEN BANK CO., LTD;
CHINA DRAGON INTERNATIONAL BANK
LIMITED; CHINA NATIONAL ACADEMY OF
CHINESE PAINTING; CHINA XINGAN HOLDING
GROUP LTD; CHIYODA ELECTRONIC INC;
CHOSON TRADING CO., LTD; CHUN XI
TRADING LIMITED; CHWRAR SIYDEARS INC;
CIRCFAB SOLUTION LTD; CIRCUITCENTRIC
INNOVATION AND SERVICE LIMITED;
CLEANCRAFTER INC; CLF IMPORT AND
EXPORT LIMITED; CLIF VITAMIN CO., LTD;
CLOUD CHAIN LTD.; CLOUD IMAGINATION
INC; CLOUDMALL LIMITED; CLOUDYBAY
LIGHTING SUPPLY INC; CMP FOUNDATION;
CNE INTERNATIONAL LTD.; CNET (AMERICA)
INVESTMENT MANAGEMENT GROUP LIMITED;
COASTALCART LLC; COBIY INC; COCOACTIVE

CO., LTD; COLD SPRING HARBOR GROUP LTD;
COLORADO (USA) HAI LI DE CROPS SCIENCE
INC.; COLORADO MEDICAL SCIENCE
TECHNOLOGY PRESS LTD.; COLORADO
MEDICAL SCIENCE TECHNOLOGY PRESS
LTD.COLORADO MEDICAL SCIENCE
TECHNOLOGY PRESS LTD.; COLUMBUS
BLOCKCHAIN INDUSTRY DEVELOPMENT
FUND; COMFY HOME INC.; COMPARATIVE
INNOVATION INTERNET TECHNOLOGY
LIMITED; COMPUTER SCIENCE EDUCATION
ASSOCIATION; CONDE INVESTMENTS LTD;
CONLITCH INC; CONSIDERABLE INC;
CONTRERAS TRADING ENTERPRISE INC;
CORTEST GROUP INC; COSMO COACH INC;
COUCOO INC.; COUPONBIRDS INC; CREALIGHT
SEMI-CONDUCTOR TECHNOLOGY INC;
CREATE VOYAGES FORWARD INC; CUTEBEE
DESIGN USA INC; CW TRADING INC; D REMIT
PTE LTD; DA GAMA BLOCKCHAIN
TECHNOLOGY CO., LTD; DA VINCI BUSINESS
SCHOOL LLC; DAC UNIVERSE INC; DANA O
TECHNOLOGY CO., LTD.; DANIRY TRADE INC;
DAO FOUNDATION; DAOTOM LIMITED;
DAPENG INTERNATIONAL INC; DATA
TYCOON(USA)SCIENCE AND TECHNOLOGY
DEVELOPMENT CO., LTD.; DAXING INC; DAY
DREAM INC; DAYHERB HERBALTECH INC; DCF
GLOBE LIMITED; DEAL NO1 FOUNDATION;
DECENTRALIZED GAME ORGANIZATION;
DECHO GROUP INC; DECO TRADING AND
TECHNOLOGY CO., LTD; DEEP BLUE
FOUNDATION; DEEP FORCE TECHNOLOGY
INC; DELIQUERE LIMITED; DELOSION
INTERNATIONAL TRADE LIMITED; DENARIUS
INTERNATIONAL TRADING COMPANY
LIMITED; DENMARKDCEX; DENVER BUSINESS
COLLEGE; DENVER INTERNATIOAL
ARBITRATION BOARD; DEREK
INTERNATIONAL TRADING INC; DESHENG
LIMITED; DESIGN PERSPECTIVE STUDIO INC;
DETER TRADING CO., LTD; DIGITAL

CURRENCY EXCHANGE CO.; DIGXBORDER US LIMITED; DINAMICS PHARMA INC; DING RUN TIMES CO., LTD; DINGSHEN KANGYANGXIN INDUSTRIAL LTD; DMIS MING CO., LTD; DOMYSMART INC; DOORS FINANCIAL SERVICES LIMITED; DOUBLESUN INC; DR. NIU TECHNOLOGY CO., LTD.; DR. WILLIAM GROUP INC; DR.GREEN BEE BIOMEDICAL TECHNOLOGY COMPANY; DR.STONE INC; DREAMSEDEN INC; DRY-PORT TRADING INC; DUHA GROUP (U.S.) INC; DUN DUN INC; DUSTON LIMITED; DUTCH FATA CHEMICAL GROUP COMPANY; DYL INTERNATIONAL INC; DYOUVE LTD; EAST TON (US) TECHNOLOGY LIMITED; EAZYCLUB LTD; ECHOPPOINT DIGITAL INC; ECLINK CO., LTD; EDDIE WONDERFUL JOURNEY INC; EDP FOUNDATION LTD.; EE COMPONENTS INC.; EF SYNTHETIC CHEMISTRY CO., LTD; EGOTWORLDLINK INC; ELAND INC; ELECNEST TECHNOLOGIES INC.; ELECT USA CO., LTD.; ELEGANT TREE TECHNOLOGY INC.; ELEPHANT TRO&COMPLAIN INC; ELITE TECH US LIMITED; ELK BIOTECHNOLOGY CO., LTD.; E-MEI CHEMICAL INDUSTRY LIMITED; EMIT FOUNDATION; ENAGIC INTERNATIONAL CO., LIMITED; ENE INTERNATIONAL INC; ENGAGE LUXURY KALAM LIMITED; ENMINE INC.; ENOR ELECTRONICS LIMITED; ENOUGH TRANSPORT TRADING CO., LTD; ENRISI TRADING CO., LTD; EPD COMPANY; EPS DESHENG INC; EPTECH LTD; ESIMOS CO.,LTD.; ESSEN FLUID CONTROL EQUIPMENT INC; ESSON BETAS GROUP LIMITED; ETHAN WATER TECHNOLOGY INC; ETHEREUM ROYALTY FOUNDATION; ETKN CUTLERY CO., LTD; ETWAY INTERNATIONAL INC; EUDES INC; EUHENG TRADING INC.; EVAMORY TRADE INC; EVERPURE ENVIRONMENTAL PROTECTION TECHNOLOGY LIMITED; EXCELLENCE TRADE INC; FACOI INC; FAGOO INC; FAIRY LAND INC; FANCY CPA LTD;

FANGHY TECHNOLOGY CO., LTD; FANLINE LIMITED; FANSMAD GROUP LIMITED; FAST BEAM LIMITED; FATER TRADING CO., LTD; FB LIMITED; FEDERAL EXCHANGE LIMITED; FEEX FINANCIAL FOUNDATION; FEIHONG INC.; FEIXIAOHAO TECHNOLOGY INC; FEIYUEWAI CROSS BORDER E-COMMERCE CO., LIMITED; FENICHOK USA CO., LIMITED; FERRARI CO., LTD.; FG ESSENTIALS LIMITED; FIL DIGITAL CURRENCY EXCHANGE LTD.; FILLE EN AIGUILLES INC.; FINAS TRADING CO., LTD; FINEST MORN GROUP INC; FINEX FOUNDATION; FINKES INC.; FINTON LEATHER CO., LTD; FIREFLY NETWORK LTD; FIREFOX INC; FIRST OVER ALL LTD; FIRSTLOVE TECHNOLOGY CO., LTD; FITKIT INDUSTRIAL USA, LLC; FLOWTECH LTD; FLYER TECHNOLOGY LTD; FLYING TRADING INC.; FND-X FOUNDATION LTD.; FOCUS SEARCH TECHNOLOGY LTD.; FONTES NOVI INVESTMENT INC; FOREST HOME INC; FORTURE KING LIMITED; FORTUTEC INC.; FORU USA INC.; FORWARD TRADE INC; FOUR DIMENSIONS CAPITAL LIMITED; FOX BANK CO., LTD; FOX RESOURCES INC; FRAGNA GLOBAL LIMITED; FREERATOR INC; FRESHOME INC; FRONT RANGE GLOBAL TRADE LTD; FRONTON INC.; FUJIN LIMITED; FUKUN CAPITAL; FULD ELECTRONIC INC; FUNICE GLOBAL INC.; FUNJOY TRADE LIMITED; FURRYFRIENDZ INC; FUTURE COIN EXCHANGE; FUTURE FLYING GROUP INC; FUTURE TRADE INC; FUTURENFT LTD; FUWAY INC; G2G E-COMMERCE COMPANY; GARAILE CO., LIMITED; GASPRO LATINO AMERICA SA CORP; GATEWAY TRADING INC; GAUSS TRADE INC; GB TIRE INC; GCEK TECHNOLOGIES INC; GDSCoin LTD; GE INDUSTRIAL TECHNOLOGY LIMITED; GEEBON US INC; GEEK TECHNOLOGY INC; GENERAL UNITED MEASUREMENT INC; GERMAN DUKE VALVE GROUP INC.; GERMAN MEISHI IMPORT AND

EXPORT CO., LTD.; GERMANY BOKRON
AGRICULTURAL CO., LTD.; GERMANY CO., LTD;
GERMANY STANHOPE INTERNATIONAL CO.,
LIMITED; GEYK INTERNATIONAL INC;
GGBONG INC; GKB GROUP CO., LTD; GLOBAL
ALLIANCE OF OUTSTANDING WOMEN;
GLOBAL BR GROUP LIMITED; GLOBAL
CHINESE ASSOCIATION FEDERATION; GLOBAL
COMMUNITY CAPITAL DEVELOPMENT FUND;
GLOBAL DREAMS INC; GLOBAL ECOMMERCE
INNOVATORS INC.; GLOBAL FINANCE INC.;
GLOBAL GREEN USA CO LTD; GLOBAL
HOMETECH LLC; GLOBAL LINK
COMMUNICATIONS LIMITED; GLOBAL
SECURITIES AND CURRENCY EXCHANGE CO.,
LTD.; GLOBAL SHARE INC; GLOBAL SHENGHUI
MEDIA INC.; GLOBAL SUPPLY LIMITED;
GLOBAL TECHNOLOGY CO., LTD.; GLORY
CEMET INC; GLORY DAYS INC; GNAUS CO.,
LTD; GO2EX LIMITED; GOGOBEA LIMITED;
GOGUQ TRADE LIMITED; GOLD TOP WIN
INTERNATIONAL LNC; GOLDEN INDUSTRY
INC.; GOLDEN MIAO INTERNATIONAL
LIMITED; GOLDEN MILESTONE INC.; GOLDEN
ORANGE WORLD TRADING CO., LTD; GOLDEN
TRIPOD INC.; GOLDFIELD INC; GONECY TRADE
INC.; GOOD WILL TECHNOLOGY COMPANY;
GOOD YOUNG HEALTH CO., LTD; GOODLANDS
PRECISION AGRICULTURE SERVICE CO., LTD.;
GOODWANG BLOCKCHAIN CO., LTD;
GOODWILL LIGHT INDUSTRIAL PRODUCTS
I&E LTD; GORDON SPORTS INC.; GOTOK INC;
GOYUX TRADE LIMITED; GRACE DEVELOPERS
CO., LTD; GRACE LTD; GRAND PAN TRADE
LIMITED; GRANDVIEW INTERNATIONAL INC.;
GRC COIN; GREAT ECHO LTD.; GREAT PARTS
INC.; GREATMARKT. INC; GREAT-VACUUM.
INC; GREELEY INTERNATIONAL TRADING CO.,
LIMITED; GREEN SHANG MAO
INTERNATIONAL GROUP; GREENIDEA
TECHNOLOGY INC; GREENWAY INC; GREYMA
HOME RICH LIMITED; GROUPLINK INC; GROW

KEEP INC; GSJ GROUP INC; GUANCHENG GROUP CO., LTD; GUI YANG VOYAGE FREIGHT INC; GYANTEX DE GROUP INC.; HABOMED INC; HAIDING TRADING CO., LTD; HAIHUA INC; HALF BEARINGS CORPORATION; HAMMER TRO&COMPLAIN INC; HANDSOME & PRETTY LTD; HANYU NETWORK MEDIA CO., LTD.; HAOMESIG TRADING CO., LIMITED; HAPPINESS ECOLOGICAL TECHNOLOGY LIMITED; HARDEN LTD; HARLEKI COMMERCE CO., LTD.; HARWAL INC; HASHMAX TECHNOLOGY INC; HATISAN INC.; HAVE GOT A DREAM LLC; HEALCARE INC; HELKARE LIMITED; HELLER GROUP COLLECTION INC; HELMSMAN (USA) PETROCHEMICAL GROUP CO., LTD; HENGJIA TRADING CO., LTD; HENGLONG CO., LTD; HENGRAN LIMITED; HENGXIN LIMITED; HENGYUE ELECTRONIC INC; HENGYUE USA INC; HERCULES HIGH PRESSURE EQUIPMENT CO., LTD.; HESTON TRADING INC.; HGT GROUP LIMITED; HIDYSEN INC.; HIGRAVITY INC; HIKEY INC; HILL TOP INC; HILLER INC.; HIMOBI TECHNOLOGY US LIMITED; HITNAT INC.; HKEX INC; HLDIRECT INC; HLONGMED INTERNATIONAL LTD; HOFFER MEASURING INSTRUMENTS CO., LIMITED; HOFOO ELECTRONIC CO., LIMITED; HOIMPRO INC; HOLLIERK TECHNOLOGY LTD; HOLMSTER LIMITED; HOME EARTH M CO., LTD; HOME SURROUNDED TRADING CORPORATION; HOMEWELL WOOD INC; HOMIER HOME INC; HOMLYNS INC.; HOMOACHIEVE INC; HONDEX INC.; HONGKONG XI LE AI LIMITED; HONGSHENG INTERNATIONAL GROUP INC; HONGSU ELECTRIC CO., LTD; HONJENNY PRECISION CASTING INC; HONYOUNG TRADING CO., LTD; HOOMIL INC; HOPE PRECISION INC; HOSI LTD.; HOSSAIN INC.; HOTBIT LIMITED; HOTKOKO INC; HOZODO INC; HQ INDUSTRIAL CO., LTD; HT SISTER LTD; HTH INTERNATIONAL INC; HUANRUI TRADING INC;

HUG STEP LLC; HUIYEAH INC; HULU INTERACTIVE INC; HUMAN PROTECTOR AI COMPANY INC; HUNTER TRO&COMPLAIN INC; HUNTSMAN TRO&COMPLAIN INC; HUPUN NETWORK CO., LTD.; HURRICANE TECHNOLOGY CO., LTD; HVE BIOTECHNOLOGY COMPANY; HYLEORY TRADING USA INC; IBF CO., LTD; IC GLOBAL SCHOOL OF VR; ICFIND INC; IDCP FOUNDATION; IDEABOX PROMO INC; IGREEN PRODUCTS INC; IMMORTAL HARVEST INC; IMMORTAL INTERNATIONAL ASSET COMPANY; IMPOSSMAKER INTELLIGENT EQUIPMENT CO., LTD; IMPULSE DYNAMICS LLC; INCHIO INC; INDEX BANK CORP.; INFINICLICK SOLUTION INC; INGENGO AUTOMOTIVE SYSTEMS INC; INGOODS CO., LTD; INMODE INC.; INNOSTYLE INNOVATIONS CO., LTD; INNOVATECH TECHNOLOGY CO., LTD; INNOVEXAR USA LLC; INSTITUTE OF ELECTRONICS AND COMPUTER; INTERNATIONAL AESTHETIC EDUCATION SOCIETY LIMITED; INTERNATIONAL ALLIANCE FOR INTEGRATIVE ONCOLOGY AND REHABILITATION RESEARCH; INTERNATIONAL ALLIANCE OF INTEGRATIVE RESPIRATORY MEDICINE; INTERNATIONAL BA CRAFT BEER ASSOCIATION; INTERNATIONAL BLOCKCHAIN INSTITUTE; INTERNATIONAL CHILDREN ROLLER SKATING ASSOCIATION; INTERNATIONAL COMFORT PRODUCTS INC; INTERNATIONAL COMMUNICATION ORGANIZATION; INTERNATIONAL CONSUMERS UNION (CONSUMERS WITHOUT BORDERS); INTERNATIONAL DIGITAL CURRENCY GROUP LIMITED; INTERNATIONAL GREEN FOUNDATION; INTERNATIONAL GREEN TELEVISION; INTERNATIONAL INNOVATIVE ART DESIGN ASSOCIATION; INTERNATIONAL QUANXI YIXIANG ACUPUNCTURE SOCIETY; INTERNATIONAL SCIENCE AND TECHNOLOGY PRESS;

INTERNATIONAL VOCATIONAL SKILLS
CERTIFICATION CENTER; INTERNET
INDUSTRY CLUSTER GROUP CO., LTD; INV
PRECHECK CO., LTD; INVECH LTD; IPC.US;
IPFS BLOCKCHAIN CO., LTD; IRONLINK INC;
ISRAEL HAIFA CHEMICAL INDUSTRY CO.,
LTD.; ISRAEL HAIFA DANFENG
AGROCHEMICAL INTERNATIONAL GROUP
(NEW YORK HOLDING) CO., LTD; ISRAEL HAIFA
PLANT NUTRITION INTERNATIONAL LTD;
ITALY OUWEITA CROP NUTRITION CO., LTD.;
IZEBRA INC; JACK&ROSE INDUSTRY LTD;
JAMES TRADING CO., LTD; JAMJJ LIMITED;
JAYA GUPTA INC.; JBM FINANCING &
INVESTMENT SOLUTION HOLDINGS
CORPORATION; JEANS DYNAMIC LTD;
JEAXSTORE INC; JECKLRY LTD; JERRICK
FITNESS TECHNOLOGY CO., LTD; JFSPORT
INC; JHAZE AUTO DECORATION LLC; JIA DI
JIA E-COMMERCE CO., LTD.; JIAJING INC;
JIANG WEN JIE LLC; JIARUI YUNZE INC;
JIETONG AUTOCYCLE INC.; JIM INTERNET
DATA CENTER. INC.; JIMEISEN INC; JIN QUAN
NOVA TRADING INC; JINGBO LTD.; JINGYI
TCHNOLOGY,INC.; JINHAO DEVELOPMENT
LIMITED; JINHAO TRADING COMPANY; JINHUI
INDUSTRIAL CO., LTD.; JMAUTOPARTS
LIMITED; JMER GREENERA HOUSEHOLD
ITEMS, INC; JMST INC; JMXING MEDIA CO.,
LTD.; JOHNSON (USA) HOLDING COMPANY
LIMITED; JOHNSON MEASUREMENT AND
CONTROL LTD; JOLLITO CO., LIMITED;
JORDAN (CHINA) MONOPOLY CO., LTD;
JOYFULJUNCTION INC; JP-EX CRYPTO ASSET
BANK; JSTORMTECH INC; JSY USA. INC; JUAN
TRADING CO., LIMITED; JUDICIAL MALLETT
&COMPLAIN INC; JUNZI TRADING CO.,
LTD; JUXING MEDIA CO., LTD; JVG MARKETS
LIMITED; JWN USA. INC; JWND LIMITED; JY
VENTURES; KAI PU LUBRICATING
TECHNOLOGY CO., LTD; KAIENPOWER INC;
KAILAS LTD; KANBEL MEDICAL CENTER;

KANSAS INSTITUTE OF CELL GENETIC ENGINEERING; KANVIEWS INC; KAODU LIMITED; KARBOLYTE BOILER INC.; KARLLIT LIMITED; KAWAI INTERNATIONAL INC; KBZ TECH INC; KENT TECHNOLOGY LIMITED; KESHENGDA INC; KETO NUTRITION (U.S.) INC.; KEYFAN CN; KEZHOU INTERNATIONAL TRADE INC.; KFT ELECTRIC CONTROL CO., LTD; KINGKOIL (USA) GROUP SMART HOME CO., LTD; KIRIN TRADE INC; KITCHOME USA LTD; KLNCOLL (U.S.A) SLEEP TECHNOLOGY CO., LTD.; KNL ELECTRONICS CO., LTD; KOROLA UZYTE INDUSTRIAL INC; KP FLOW LIMITED; KQT EXCHANGE LTD.; KRYPTO TRADING SERVICE INC.; KSWFWE LTD.; KUAISEN LLC; KUNGFU LTD; KUNPENG ENTERPRISES INTERNATIONAL, LTD.; KYL (USA) MACHINERY CO., LTD.; KYLEMORE HOME INC; LAMOFY TRADE INC; LAN & LAN COOPERATE INC; LANCDON INTERNATIONAL TRADE INC.; LANCDON LTD; LAND MARKETING TRADING CORPORATION; LANK INTERNATIONAL FOUNDATION; LANSER SUCCESS MEMBRANE TECHNOLOGY CO., LTD; LARAIN TRADE INC; LASFOCO CO., LTD; LATOUR TRADING INC.; LAULAU INC.; LAUREN & HAROLD DESIGN INC; LAWE INC; LAWRENCITY UNION TRADING CORPORATION; LBE TECH US LIMITED; LD ENERGY GROUP LIMITED; LDX TECHNOLOGY LIMITED; LE LAUIS INC.; LEBEN SUN INC; LEDSMaster INC.; LEGEND PACKAGING INC; LEICESTER TRADING CO., LTD; LEITE TECHNOLOGY INC; LEKATE LIMITED; LEMOHOUSE INCORPORATION; LEOO HAIR LTD; LI CLEAN BIOTECHNOLOGY CO., LTD.; LIANZE COMPANY; LIFA LIMITED; LIFERSE INC; LIGHTBIZ INC; LIGHTINGBOX LIMITED; LIJUN TRADING CO., LTD; LIMEHIGHT INTERNATIONAL ENTERTAINMENT AND MEDIA LI MITED; LIMITLESS ALLIANCE STOCK INC.; LINGO INTERNATIONAL GROUP

LABOR DISPATCH CO., LTD; LINGZHIO INC;
LINHAI ZHUOHAO LIGHTING INC; LINK IN
CART LLC; LINKHANDS SPORTS LIMITED;
LIPING TRADING CO., LTD; LIPOTEC US INC;
LISASIY INC; LITIMEE. INC; LITTLE BUNNY
TRADING INC.; LIU BIAO NOVA TRADING INC;
LIUGANG TRADING CO., LTD; LIVEVIGON BIG
DATA CO., LTD; LIYU TRADE INC; LM
HARDWARE ACCESSORIES CO., LTD.; LNC
INTERNATIONAL FOUNDATION; LOAD STAR
INTERNATION TRADE INC; LOGFRESH
BIOTECHNOLOGY CO., LTD; LOMICAR TRADE
CO., LIMITED; LONG HU SHAN LI DAO
ACADEMY IN THE UNITED STATES; LONG RED
COIN; LONG RIVER TRADE INC; LONGBIDA;
LONGKOU TRADING INC; LONICY TRADE INC;
LOOT HOOT FOUNDATION; LOOYOO CO., LTD.;
LOUFFEY TECHNOLOGY CO., LTD.;
LOUISTONE TRADING INC; LOVE LIFE
TRADING INC.; LOVEGO MEDICAL INC;
LUCKIBUY INC; LUKBABY INC.; LULY E-
COMMERCE INC; LUMINOUS WHISPER INC.;
LUNANARA CO., LTD.; LUOX INC.; LURNER
INTERNATIONAL LIMITED; LUSTROUS
INTERNATIONAL INC.; LVFENGYUAN
VENTURE CAPITAL CENTURY CO., LTD; LWSRX
INC.; LYESEANTECH INC.; M12 MICROSOFT'S
VENTURE FUND INC; MACANO TRADING CO.,
LTD

Defendants.

| | |
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| PHILIP J. WEISER, Attorney General LAUREN M. 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) 508-6000 FAX: (720) 508-6040 *Counsel of Record | Case No. Div.: |
| COMPLAINT FOR JUDICIAL DISSOLUTION | |

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

INTRODUCTION

1. This case concerns a widespread pattern of deceptive business filings that undermine the integrity of Colorado’s corporate registry and create substantial risks to consumers.

2. Colorado’s corporate registry serves a critical public function. Consumers, lenders, investors, businesses, and regulators rely on the registry to verify whether businesses are legitimate, where they can be contacted, and whether they can be held accountable through legal process.

3. Defendants are hundreds of corporations and limited liability companies (“Defendants”) that filed formation documents with the Colorado Secretary of State using the address 1312 17th Street, Box 692, Denver, Colorado (the “17th Street Address”).

4. The 17th Street Address is a virtual mailbox operated by the management company iPostal1(“iPostal”). A virtual mailbox is a type of commercial post office box operated by a management company, which scans and uploads all mail addressed to a particular address so the recipient customer can view and manage their mail online.

5. iPostal did not consent to the use of the 17th Street Address by Defendants. iPostal rented the 17th Street Address to a single individual for

personal, as opposed to business, use. That individual had no authority to consent to Defendants utilizing the 17th Street Address in filings with the Secretary of State.

6. Even if Defendants had iPostal's consent to use the 17th Street Addresses in their business filings, which they did not, these addresses are ineligible to be used as registered agent addresses in the state of Colorado.

7. Since at least 2024, Colorado law has disallowed the use of a virtual mailbox as a registered agent address. *See* C.R.S. § 7-90-102(56)(a) (providing that a registered agent address must be at the agent's "usual place of business") & C.R.S. § 7-90-102(56)(b) (further providing that "usual place of business" does *not* include a United States or commercial post office box). Nonetheless, Defendants each continue to list a virtual mailbox as their registered agent address and principal place of business address in their filings with the Secretary of State.

8. By listing this unauthorized address in their business filings, Defendants introduced false information into Colorado's corporate filing system. Those false filings created the appearance of legitimacy for entities that often could not be verified, contacted, or have their registered agent properly served at the address they claimed to occupy.

9. The Attorney General has received complaints involving entities associated with 17th Street Address alleging investment schemes and cryptocurrency-related fraud.

10. Consumers report relying on Colorado business registrations and certificates of good standing before sending money to these entities. The fraudulent filings thus created marketplace legitimacy that induced consumer transactions and caused significant consumer harm.

11. The conduct alleged here also harms more than individual consumers. Fraudulent business filings impair the ability of consumers and regulators to identify who controls an entity, where the entity actually operates, and how it may be contacted. They obstruct service of process, frustrate enforcement efforts, and undermine confidence in Colorado's business registry.

12. The continued existence of entities organized through materially false filing information perpetuates ongoing risks to consumers, financial institutions, regulators, and the public by allowing those entities to continue representing that they are legitimate Colorado businesses operating from addresses they were never authorized to use.

13. The Attorney General brings this action to stop violations of the Colorado Consumer Protection Act (“CCPA”) and dissolve Defendants pursuant to the Colorado Business Corporations Act, Colo. Rev. Stat. sections 7-114-301 through 304, and the Colorado Limited Liability Company Act, Colo. Rev. Stat. sections 7-80-810 through 813.¹

PARTIES

14. 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 provisions of the CCPA. The Attorney General is also authorized under C.R.S. §§ 7-114-301 and 7-80-810 to judicially dissolve entities that obtained their articles of organization (for LLCs) or incorporation (for corporations) through fraud or that have exceeded the authority conferred upon them by law.

15. Defendants are 834 corporations and limited liability companies that list the 17th Street Address as the location of their registered agent and principal office address. A complete listing of Defendants is attached to this Complaint as Exhibit A.²

16. Defendants also include multiple entities purporting to be colleges and universities, research institutes, and investment platforms, including DENVER BUSINESS COLLEGE (ID#: 20191457056), American Colorado Gene Cell Engineering Institute (ID: 20208005851), and American Alliance International Investment Group Co., Ltd (ID# 20211124178).

17. Some Defendants have also used names that are similar to well-known commercial brands or public institutions, including American Academy of Sleep Medicine (ID#: 20231172506), Andrew W. Mellon Foundation (ID#: 20241067439), America Serta Bedding (Group) Co., Limited (ID#: 20231905300), and AMERICA SIMMONS FURNITURE PRODUCTS GROUP CO., LIMITED (ID#: 20201362442).

¹ The Attorney General is simultaneously filing multiple complaints against entities fraudulently formed using virtual mailboxes at 1312 17th Street. The Attorney General is unable to file these actions together in one complaint due to technical constraints relating to the high number of Defendants.

² Due to the volume of fraudulent entities registered at Box 692, the Attorney General is required to file two complaints (one against the first half of entities at this box, and the other against the second half) in order to meet certain technical filing requirements.

JURISDICTION AND VENUE

18. This Court has jurisdiction to dissolve Defendants pursuant to C.R.S. §§ 7-80-811(1) and 7-114-302(1).

19. The Court also has jurisdiction under C.R.S. § 6-1-110 to make such orders or judgments as may be necessary to prevent deceptive trade practices. Registering a business using false information or for fraudulent purposes constitutes a deceptive trade practice under the CCPA. *See* C.R.S. § 6-1-105(1)(ppp) & C.R.S. § 7-90-314(5).

20. Venue is proper in Denver District Court pursuant to C.R.S. §§ 7-80-811(1) and 7-114-302(1) (dissolution proceedings “shall be brought in the district court for the county in this state in which the street address of the [limited liability company or corporation’s] principal office or the street address of its registered agent is located”). Here, Defendants each list the 17th Street Address, located in Denver County, as the address of their registered agent and as their principal office address.

21. The violations alleged herein also occurred through the access and use of the Colorado Secretary of State’s online filing system maintained in Denver, Colorado.

22. The claims against Defendants arise from the same core scheme. Each Defendant used the same virtual mailbox location at the 17th Street Address in filings with the Colorado Secretary of State despite lacking authorization to do so.

23. The claims against Defendants therefore involve common issues, including whether the entities falsely represented authorization to use the 17th Street Address, whether the filings violated Colorado law, whether the entities were organized or maintained through materially false information, and whether dissolution is warranted under the Colorado Consumer Protection Act and Title 7 of the Colorado Revised Statutes.

24. The Attorney General’s claims against Defendants will also be established through substantially overlapping evidence, including Secretary of State records, mailbox provider records, USPS authorization records, and evidence concerning the lack of authorization to use the 17th Street Address.

RELEVANT TIMES

25. The conduct giving rise to the claims in this Complaint has been ongoing since at least 2021 through the present. Defendants are all currently listed as

Colorado businesses³ within the Secretary of State's corporate registry and all continue to list the 17th Street Address as their registered agent address and principal place of business.

GENERAL ALLEGATIONS

I. The Secretary of State's online business registry and fraudulent business filings.

26. The Colorado Secretary of State maintains an online business filing system that facilitates the formation and management of corporate entities in Colorado. The system also allows consumers to search for businesses and assess their legitimacy.

27. Fraudulent business filings have long posed a significant problem in Colorado. Bad actors from around the world, largely operating out of China and Southeast Asia, have exploited Colorado's business registry to create fraudulent entities on a massive scale, and have used those entities to perpetrate scams against consumers worldwide.

28. Fraudulently filed entities are often the first step in broader fraudulent schemes. The appearance of legitimacy created by registration with the Colorado Secretary of State enables scammers to open bank accounts or obtain additional accreditations or registrations from agencies such as the United States Department of the Treasury, which are then used to further persuade unsuspecting consumers to provide money or financial information.

29. In addition to undermining the general integrity of Colorado's corporate registry system, many Defendants have also engaged in schemes directly targeting consumers, including investment scams, cryptocurrency scams, retail scams, impostor scams, and romance scams.

30. The Attorney General brings this action to protect the integrity of Colorado's business registry system and to ensure that entities formed in Colorado provide truthful and accurate information.

³ Defendants are currently in various statuses with the Secretary of State; only a judicial dissolution pursuant to C.R.S. § 7-90-1002(1)(e) will ensure that Defendants cannot later be restored to good standing at these same unauthorized addresses.

II. Defendants do not have consent to use the 17th Street Address in their business filings.

31. Each Defendant listed the 17th Street Address virtual mailbox as its registered agent address in formation documents filed with the Colorado Secretary of State. Defendants listed the same address as their principal place of business.

32. In 2024, the Colorado legislature clarified that businesses are not permitted to use virtual mailboxes as the location of their registered agents. *See* C.R.S. § 7-90-102(56)(a) & (b). Even before that law's passage, the Secretary of State interpreted previously existing law to preclude the use of a virtual mailbox as a registered agent address. *See* Report of the Fraudulent Filings Working Group at 12, ¶ 3(b)(iii) (Feb. 2023).⁴

33. At least 106 Defendants were created after the 2024 clarification of law, and all Defendants continue to list the virtual mailbox as their registered agent address nearly two years later. Part 1: Moreover, entities have continued to be registered using this address into 2026, the most recent of which was filed on May 7, 2026.

34. The virtual mailbox at issue in this case is operated by iPostal, a commercial virtual mailbox provider.

35. iPostal provides virtual mailbox and digital mail management services that allow authorized users to receive and manage mail remotely.

36. To obtain and use a virtual mailbox through iPostal, a user is required to provide accurate identifying information regarding the individual or business authorized to receive mail at the mailbox.

37. Users are also required to complete, sign, and notarize USPS Form 1583, the official United States Postal Service form authorizing a commercial mail receiving agency—including iPostal—to receive mail on the user's behalf. Federal regulations require a separate authorization for each person or business entity receiving mail through the virtual mailbox.

38. With respect to the 17th Street Address, only one individual—Chao Guan, a resident of Shenzhen, China—was authorized to receive mail at the address. Guan submitted a USPS Form 1583 solely on his own behalf as an

⁴ *Available at*

<https://www.coloradosos.gov/pubs/business/fraudWorkingGroupArchive/2023/20230210FinalReportSB22-034.pdf>

individual. Guan did not disclose to iPostal or the United States Postal Service that any business entity would receive mail at the address or use the address in corporate filings. Nor did Guan seek or obtain authorization to receive mail on behalf of any other individual or entity.

39. iPostal has confirmed that none of the Defendants had authorization or consent to use the 17th Street Address in any corporate filing and that such use violated iPostal's terms and conditions.

40. Defendants likewise failed to submit USPS Forms 1583 authorizing them to receive mail at the 17th Street Address, as required under federal postal regulations.

41. No Defendant was identified to the virtual mailbox provider or USPS as authorized to receive mail at the address.

42. Defendants were therefore fraudulently organized and/or registered in Colorado because they falsely represented that the 17th Street Address was their registered agent address and principal place of business, when none of the entities had lawful authorization or consent to use that address for those purposes.

III. Many Defendants have leveraged their Colorado business registrations to create additional false indicia of legitimacy through federal filings and regulatory registrations.

43. Some Defendants also appear to have filed registrations, notices, and other records with the United States Department of the Treasury, further compounding their unwarranted appearance of legitimacy.

44. For example, numerous Defendants have registered as Money Services Businesses ("MSBs") using the 17th Street Address despite lacking any lawful right to operate from that location.

45. A person or entity participating as an "administrator" or "exchanger" in a currency exchange service, including cryptocurrency, is a Money Services Business under federal law.

46. Generally, every MSB must register with the Financial Crimes Enforcement Network ("FinCEN"), a bureau within the United States Department of the Treasury.

47. There are approximately 4,000 registered MSBs total in the State of Colorado.

48. More than 800 of those MSBs—approximately one-fifth of all MSBs registered in Colorado—are registered to various virtual mailboxes at 1312 17th Street.

49. Approximately 36 MSBs are registered to entities purportedly located at Box 692.

50. Thus, dozens of the Defendants are representing to the United States Department of the Treasury and to Colorado consumers that they are currency administrators or exchangers operating from the 17th Street Address when they have no lawful right to use or occupy that address for business purposes.

51. These additional layers of apparent legitimacy are built upon the same foundational misrepresentation: that the businesses are legitimately located at the 17th Street Address.

IV. Many Defendants appear to have engaged in fraud.

52. Entities located at the 1312 17th Street virtual mailboxes, whether named in this Complaint or in one of the Attorney General's other concurrently filed complaints, are repeatedly identified in complaints submitted to the Colorado Attorney General's Office and in other forums. These complaints involve a wide range of alleged fraudulent activity, including investment and cryptocurrency schemes.

53. With respect to the Defendants named in the Attorney General's Complaints regarding Box 692, some examples include:⁵

- A. Bluzor (ID#: 20201977465) - After depositing cryptocurrency into an account, a Colorado consumer was told that withdrawals were blocked and the consumer needed to send additional cryptocurrency to an external wallet address to pay interest in on a loan in order to unlock or withdraw the funds. The consumer did not receive the funds.

⁵ The Attorney General is entitled to the relief requested in this Complaint due to the simple fact that Defendants submitted false information to the Secretary of State regarding their registered agents and principal places of business. The following are illustrative examples of the types of dangers that fraudulently formed entities create for consumers, but Attorney General is not required to prove that any Defendant engaged in fraud in order to obtain the requested relief.

- B. Regal Core Market (ID#: 20201940798) - A consumer complained that they had invested \$30,000 with company which then withheld these funds and refused to give them back to the consumer.
- C. FineX (ID#: 20218078622) - A consumer invested \$168,000 in the cryptocurrency exchange. When the consumer attempted to withdraw their funds, the company required the consumer to pay over \$19,000 in taxes, \$1,680 in other fees, and then requested another \$1,000 to unfreeze the funds. The consumer never received the funds.

54. The majority of complaints received by the Attorney General involving the 17th Street Address concern investment schemes, including cryptocurrency investment schemes. Many of these schemes bear the hallmarks of “pig butchering” scams. Pig butchering is a form of confidence and investment fraud in which victims are gradually persuaded to make increasing monetary contributions—commonly in cryptocurrency—to what appears to be a legitimate investment platform before the perpetrators ultimately abscond with the funds.⁶

55. Recovering money from cryptocurrency and online investment scams is often extraordinarily difficult, even for law enforcement, because the schemes are designed to move funds rapidly across jurisdictions, accounts, and technologies specifically intended to frustrate tracing and recovery efforts.

56. By the time victims recognize the fraud and report it, the funds have frequently already been converted into cryptocurrency, transferred through multiple wallets or exchanges, moved overseas, or dispersed among numerous intermediary accounts, making it extremely difficult to identify, freeze, or reclaim the assets before they disappear.

57. In addition, shell entities registered using false information (like Defendants), and their online platforms can be created and abandoned quickly. Even when law enforcement is able to successfully identify an account associated with the fraud, recovery may depend on cooperation from foreign governments, international exchanges, or third-party intermediaries, many of whom may lack records, refuse cooperation, or operate in jurisdictions with limited regulatory oversight.

⁶ Federal Deposit Insurance Corporation, Office of Inspector General, *Pig Butchering Scams*, <https://www.fdicig.gov/pig-butchering-scams>.

58. As a result, victims often suffer permanent financial losses despite substantial investigative efforts by law enforcement authorities.

FIRST CLAIM FOR RELIEF

Including an address in a document filed in the Secretary of State's office without the authority to do so

Colo. Rev. Stat. §§ 7-90-314(1)(b), 7-90-314(1)(c), & 6-1-105(1)(ppp)

59. Plaintiff incorporates by reference all allegations preceding and following this paragraph.

60. Defendants filed business registration documents with the Secretary of State's Office using an address they were not authorized to use. Specifically, Defendants identified a virtual mailbox at the 17th Street Addresses as their registered agent and principal place of business address without the consent of the owner or occupant of that address.

61. By filing business registration documents using unauthorized addresses without consent, Defendants made filings with the Secretary of State's Office without lawful authority.

62. By means of the above-described conduct, Defendants have deceived and misled the public and unlawfully acquired a benefit.

SECOND CLAIM FOR RELIEF

Judicial Dissolution due to obtaining Articles of Organization or Incorporation through fraud

Colo. Rev. Stat. §§ 7-8-810, 7-8-813, & 7-114-301 through 305

63. Plaintiff incorporates by reference all allegations preceding and following this paragraph.

64. Through the above-described conduct, Defendants obtained their articles of organization or incorporation through fraud.

65. At least some of these Defendants, including those set forth above, also abused the authority conferred upon them by law by subjecting consumers to investment fraud and other schemes.

66. The continued existence of entities formed or maintained through materially false filing information poses an ongoing risk to consumers, regulators, financial institutions, and the integrity of Colorado's corporate registry. Judicial dissolution is therefore necessary to prevent further misuse of Colorado business

registrations and to protect the public from continued deception arising from unauthorized and false business filings.

67. Because Defendants obtained their articles of organization or incorporation through fraud, the Attorney General requests that this Court enter a decree dissolving the entities pursuant to Colo. Rev. Stat. sections 7-80-810(1)(a), 7-80-810(1)(b), and 7-80-813(1) and 7-114-301(1)(a), 7-114-301(1)(b), and 7-114-304(1).

RELIEF REQUESTED

WHEREFORE, Plaintiff requests entry of judgment in his favor, and for injunctive relief as follows:

- A. A declaration that Defendants violated the Colorado Consumer Protection Act, C.R.S. § 6-1-105(1)(ppp), by including addresses in documents filed with the Colorado Secretary of State without lawful authority or consent to do so;
- B. A determination that Defendants obtained their articles of organization or incorporation through materially false or fraudulent filings, including the unauthorized use of the 17th Street Address as a registered agent address and principal office address;
- C. Pursuant to C.R.S. §§ 7-80-810 through 7-80-813 and §§ 7-114-301 through 7-114-304, entry of a decree judicially dissolving each Defendant identified in Exhibit A;
- D. Orders directing the winding up and liquidation of Defendants in accordance with applicable provisions of Title 7 of the Colorado Revised Statutes;
- E. An order directing the giving of notice to claimants in accordance with Colo. Rev. Stat. sections 7-90-911 and 7-90-912;
- F. Injunctive and equitable relief necessary to protect the public and preserve the integrity of Colorado's corporate filing system, including orders preventing Defendants from continuing to maintain or rely upon false business registration information filed with the Colorado Secretary of State, pursuant to C.R.S. § 6-1-110(1);
- G. Such additional orders as may be necessary to effectuate dissolution, provide notice to claimants, and carry out the purposes of the Court's

decree;

H. Any additional relief the Court deems just and proper.

Respectfully submitted this 20th day of May, 2026.

PHILIP J. WEISER
Attorney General

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