

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

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CASE NUMBER: 2026CV31835

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

Plaintiff,

v.

LIVDRONE GLOBAL TRADE INC.; LIVEWIRES
TRADING CO., LTD; LIVSIMPLE LTD.; LLEOKKK
INC.; LONG ASIA GROUP NZ LIMITED;
LONGWOOD GLOBAL INC.; LOVISSOM LTD.;
LQH INTEGRATED LTD; LTEBK LTD.; LUCKY
YEAR INC.; LUCKYFIVE TRADE INC.;
LUCKYLIFE CO., LTD; LUMEX NETWORK
TECHNOLOGIES INC.; LUMOSENERGY INC;
LUSHIGH TRADE INC; LUXEHAVEN INC;
LUXELATEXSKIN LTD.; LUXYOO INC.; LUZ
HARBOR INC; LZ.BRAND TRADING INC;
MACROZEN LLC; MAGNA CARTA INVESTMENT
GROUP INC; MANCO LTD.; MANHATTAN (USA)
STOCK LIMITED; MANYCOIN LTD; MAPFRE S.A.
LTD; MARJUY TECH INC; MASTER MEDIA CO.,
LTD; MAXIMUCOIN LTD; MAXTOP STAR INC;
MAYLIFE TRADING CO., LTD; MB GROUP
LIMITED; MCCUE FURNITURE LTD; MDIBZCA
INC.; MEBMK TRADE INC; MEGA SUPPLY
CHAIN (USA) INC.; MELISSA INTERNATIONAL
INC.; MERIDIANLINK TRADE LIMITED; MESA
CAPITAL PARTNERS LTD; META TIGER LABS
LTD; METAARENA LIMITED; METABANK INC;
METALINK; METANING TRADING LTD; MEX
FINANCIAL LIMITED; MIAODING HOME
FURNISHINGS CO., LTD; MIC SUPPLY LTD;
MIDAS TOUCH CAPITAL LTD; MILEHIGH
MERCH CO.; MILLFER TRADING INC.;
MINEVISTA LTD; MINGLIXUN TECHNOLOGY
INC.; MING'S INTERNATIONAL INC; MINTEX
INTERNATIONAL CAPITAL LIMITED; MINTPAY

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INNOVATIONS CO., LTD; MJKJ TRADING INC.;
MMALL TRADE INC; MMI TECHNOLOGY LTD;
MOLIAN TECHNOLOGY CO., LIMITED;
MOMENTUM CAPITAL ADVISORS LTD;
MONTRAVA EQUITY LTD; MORGAN ARK
GLOBAL CAPITAL LIMITED; MORGAN CAPITAL
PTY LTD; MORGANSTANLEY FX LTD; MORO
TECHNOLOGY INC; MOROCOIN TECH CORP.;
MOSANES TECHNOLOGIES LIMITED; MOTYY
INC; MOUNTAIN FIELD LTD; MSBKK GROUP
LIMITED; MUYE TECHNOLOGY LIMITED; MVPI
CAPITAL INVESTMENT LIMITED; MYSIA
CRYPTOCURRENCY EXCHANGE LTD; NAP
FINANCE LTD; NATA OPTICS INC; NBCOIN INC;
NEURACHAIN LTD; NEURAL X FOUNDATION
LTD; NEVER OVER GOLF INC; NEW DOGEN
LTD.; NEW ERA LTD; NEW HOPE CHARITY
FOUNDATION LTD; NEW NEXT TIME; NEW
PEAK INC; NEW SANWILN INC; NEW STAR
TECHNOLOGY INC.; NEW XMZ INC; NEWEASE
TECH INC; NEWRGY IMEX INTERNATIONAL
MONETARYEXCHANGE LTD; NEWRISH LTD.;
NEWROAD ELECTRONIC COMMERCE CO US
LTD.; NEWWORLD METALS INC.; NEWYOUNG
CO.; NEXAHOME ELECTRONICS INC.; NEXERA
DYNAMICS LIMITED; NEXGEN COMMERCE
LLC; NEXORA TECH INC; NEXPULSE E-
COMMERCE CO., LTD; NEXTHORIZON FREIGHT
INC; NEXUS TRADE LTD; NEXUSTECH INC;
NFINITY TECHNOLOGY LIMITED; NIMMOO
INC; NINEHILLS TECHNOLOGY INC; NING DA
TEADE INC; NIUBDBDLNSMSAOR INC.;
NOVAGRO TECHNOLOGIES INC; NOVAX
GLOBAL EXCHANGE INC; NUOSHENG
PRECISION MANUFACTURING INC.; NUVIONX
GLOBAL CORP LNC; OAK SMART INVESTMENT
LTD.; OCEAN AI LTD; OCEAN BRIDGE INC;
OCHBEE TRADING INC.; OCSHION
TECHNOLOGY CO., LIMITED; ODYSSEY
DIVERSIFICATION LTD; OFFICEMATE INC.;
OKO INTERNATIONAL E-COMMERCE INC; OK-R
GLOBAL LTD; OMAN INVESTMENT AUTHORITY

LTD; ONE RICH HEART INC; ONEKEYON LTD;
ONETECH INC.; OPENLEDGER FOUNDATION;
OPENSHERE TRADING INC.; OPTIMUM
ANALYTICS LIMITED; ORBIONEX GLOBAL
TECHNOLOGIES INC.; ORBIS MARKETS GROUP
FOUNDATION LTD; ORION DIGITAL MEDIA
INC; ORION HOLDING LIMITED; ORPHEUS
INC.; OSMO CAPITAL MARKETS LIMITED;
OUTOES INC; PACIFIC TRADE VENTURES INC.;
PAHAJIM HZ CO., LTD; PALAMEI TRADING
INC.; PANDA'S SHOP INC.; PARAMOUNT
GLOBAL INC.; PARIS CHAN LTD; PARKERS
BOILER LIMITED; PATCAT INC.; PEACE HOMES
FOUNDATION LTD.; PEACEFIRE TRADING INC;
PEAK STATE TECHNOLOGY LTD; PEAK
TECHNOLOGY LTD; PEGNDA TRADE INC;
PENGYUE ELECTRONIC TRADING CO., LTD;
PERMANENT EXCELLENT TECH INC;
PERRYBAND LTD.; PGIM QUANTITATIVE
SOLUTIONS LTD; PHOENIX LTD; PHYCHAIN
LTD; PIMCO MTS LTD; PINAKINE LIQUIDITY
LTD; PINEFLOWER LIMITED; PINNACLE
MARKETS LIMITED; PINYOU NETWORK
TECHNOLOGY LIMITED; PIONEER PEAK
SOLUTIONS LTD; PLANET EXCHANGE
LIMITED; PLSXA LIMITED; PNBO-
TECHNOLOGY INC.; POCOIN TECH CO., LTD;
PODA TRADE CO., LTD; PODA TRADE CO.,LTD;
POKERSTARS PLAY LTD; POWELL TRADING
INC.; POWER CHAIN LINK. INC; POWER LIFE
INC.; POWERFUL GLOBAL TRADING INC;
POWERHORN INC.; PQNXZKB LTD.; PRECISE
PLANNING GROUP LIMITED; PREMIER
DECORATIONS INC; PRIMEAGRI VENTURES
LTD; PRIMECONNECT LIGHTS CO., LTD;
PROBRIXX E-COMMERCE CO., LTD; PROJECT R
INC.; PROLUXE CO LTD.; PULLBAM TRADING
INC; PURELY TECHNOLOGY LTD; PXYCOIN
LTD; QASX LTD; QIANGFEI TEADE INC;
QIHANG E-COMMERCE CO., LTD; QRS GLOBAL
LLC; QSB GLOBAL LIMITED; QUALBUY INC.;
QUANTUM FUTURE LTD; QUANTUM LEAP INC.;

QUANTUMLEA INC.; QUENCH Q TECHNOLOGY GROUP CORP; QUICKOK EXCHANGE CO., LTD; RABBANI TRADING LTD.; RADCLIFFO LTD.; RAXLING INC.; RBA CAPITAL FOUNDATION; REALHX GROUP LIMITED; REALRED TRADING INC; REFURPHONE US LTD; REVINVEST LIMITED; REWARDINBOX INC; REYNOLD INTERNATIONAL SECURITIES LTD.; RHF GLOBAL TECHNOLOGY LTD.; RICHANG LIMITED; RIDDER TRADER LIMITED; RING TONE INC.; RION COPPERATION TECH INC; RISUN HOLDINGS INC; RIVER FIELD LTD; ROCKET GLOBAL FOREX LTD; ROCKETINVEST LIMITED; ROCKY DECORATION INC; ROCTRY INC; ROLLING LIQUIDATION HUB INC.; ROOGOO INC.; ROYADATA INC.; ROYAL ANGEL DIGITAL CURRENCY GROUP LTD; ROYAL FAMILY LIMITED; ROYAL HOME CONSTRUCTION INC; ROYANUTRI BIOTECHNOLOGY INC.; RRWDBB INC; RUICHANGJIN CO., LTD; RUITIAN TRADING CO., LTD; RUNQ HOME LTD.; RUNTOO TEXTILE & GARMENT CO., LTD.; RUOYAO TRADING CO., LTD; SALEN INC; SAM FAMILY OFFICE LIMITED; SAMEPLACE LLC; SAMYEA INDUSTRY INC.; SAN POLARITY LTD; SANBAND TRADING INC.; SANDBAR GLOBAL TRADING LIMITED; SANHE XINGUANG TRADING INC; SANKODA INTERNATIONAL LTD; SAUDI INVESTMENT BANK CO., LTD.; SAYU INC.; SC TOP CO., LTD; SCANDIC HOTELS GROUP LTD; SCENTSTYLUS LLC; SCF INTERNATIONAL HOLDING COMPANY; SCIENCE AND TECHNOLOGY FRONTIER PUBLISHING CO., LTD; SEAGOLL OCEANIC CAPITAL LTD; SEELATION TRADING INC; SENLESHI INC.; SENRONG E-COMMERCE INC.; SENXAX FINTECH COMPANY; SEPURA (USA) NEW MATERIALS LIMITED; SEVENSTAR INC; SEXDOLLIFE LTD.; SHABOO INTERNATIONAL TRADING INC.; SHALLMAN TRADING INC.; SHALLWOOD GLOBAL TRADE INC;

SHAMBHALA INC.; SHARON'S FIND HUB LTD;
SHAWII VIRTUAL ENTERTAINMENT LTD;
SHELBY LTD.; SHIELDPRO TRADING INC;
SHIKE GUANGYING FILM & TELEVISION
CULTURE CO., LTD.; SHILLTON
INTERNATIONAL INC; SHIQI TRADING CO.,
LTD; SHOPSAGE SOLUTIONS LLC; SHUNXIN
TRADING LIMITED; SILIAN PHARMACEUTICAL
AND BIOLOGICAL LIMITED; SILICA CHAIN
LTD; SILICON VALLEY MELLON FOUNDATION;
SILKPRO LTD; SILVERSTONE HOME
IMPROVEMENT INC; SILVERTIDE COMMERCE
LIMITED; SILVERWIND LTD; SIMLIKE HEALTH
INC; SIMMONS (USA) HOLDINGS CO., LTD;
SIMONE INTERNATIONAL TRADING INC;
SIMPLE HAPPLE LIMITED; SIMPLEBUY
ONLINE SHOPPING SOLUTIONS INC; SIRCLE
DIGITAL LIMITED; SIRENXING LOGISTICS
SUPPLY CHAIN CO., LTD.; SKY BOULDER LTD.;
SKY FJ TRADING LIMITED; SKY VALLEY LTD;
SKYGLOW INC; SKYGLOW LTD; SKYNOVA LTD;
SKYVENTURES INC.; SMART HEALTH
FORESTRY COMPANY LIMITED; SMART HOME
INC.; SMART WEALTH INVESTMENT ACADEMY
LTD; SMOKETEA LTD.; SNABB TECHNOLOGY
INC; SNEA GLOBAL FINANCIAL TRADING
INVESTMENT LTD; SNOK ECOMMERCE
SOLUTIONS INC; SOLIMOE'S TRADING INC.;
SOLULU CLUB LTD; SONGFUN TRADING INC;
SONNETDANCE LIMITED; SOOPCASE INC.;
SOOY TRADING INC; SPARK SCIENCE LLC;
SPEOEX GLOBAL LTD; SPORTSSTYLE ATTIRE
CO.; SSHY LTD; STAR BOSS INC; STAR HUIHUA
INTERNATIONAL TRADING CO., LTD; STAR
TECHNOLOGY CO., LTD; STAR WORLD E-
COMMERCE INC; STARHILL TECHNOLOGY
NETWORK LIMITED; STARSNSTripES
COMMERCE LIMITED; STARYX WAREHOUSE
LTD; STATE OWNED INTERNATIONAL TRADE
CO., LTD; STBT LTD; STELLAR (U.S.A.) TRADING
CO., LTD; STELLARVAULT TECHNOLOGY CO.,
LTD; STERLING GROUP CO., LTD; STORM TIME

INC; SUCCEDO MARKETS LIMITED; SUDARO EXPORT FOREIGN TRADE INC; SUER ELECTRONIC PRODUCTS CO., LTD; SUMMER GROUP INC; SUN GROUP MARKETS GLOBAL LTD.; SUNBO EXCHANGE LTD; SUNFIRE TECH LLC; SUNHILLY TRADING INC.; SUNLIGHT GROUP INC; SUNTONAL INC.; SUNWALD LTD.; SUPER FUTURE TECHNOLOGY CO., LTD; SUPERFIN CORP LIMITED; SUPERSOFT CORPORATION; SUPERSOSO LTD; SUPERWINNERS TRADING INC; SUPERYOUNG GLOBAL TRADE INC.; SUPRESTA L.L.C.; SURMOON TRADING INC; SURPRISE MAKER E-COMMERCE INC.; SW INTER LTD; SWEET INTELLIGENCE INC; SWEET INTERNATIONAL TRADE CO., LIMITED; SWYSHARE LTD; SYELLOW FX LIMITED; SYGNIA ASSET MANAGEMENT LIMITED; SYNC MARKETS LTD; SYNTHRA CAPITAL LTD; TAIBAI INVESTMENTS PTE. LTD.; TAIJI TECHNOLOGY LIMITED; TAIKUA LTD; TAIYI ELECTRONIC LTD; TANIMOTO TOBAYASHI PRECISION LTD.; TANTIN GROUP LTD.; TBIFUC INC.; TBN INTERNATIONAL TRANSPORTATION AGENCY LIMITED; TEACIG LTD.; TEASMO LTD.; TEASMOKE LTD.; TECHUB CREATIONS INC; TEMP FASHION INC.; TENG LONG TRADING INC; TENGJING INTERNATIONAL TRADE INC; TERRALABS INC; THALFG GLOBAL LIMITED; THE ASIA-PACIFIC (MACAU) INTERNATIONAL MONTESSORI EDUCATION ASSOCIATION; THE MASSES CHOICE INC; THEMMASTER SPORT LTD; THIHILL GLOBAL E-COMMERCE INC.; THREAD CRAFT INTERNATIONAL INC.; THREE PIECES OF FIREWOOD TRADING INC.; TIAN TIAN HOME FURNISHINGS INC.; TIEEYO CO., LTD.; TIKAMAZING LIFE STYLE JOLLY DEPOT INC; TIMELESS GLORY LIMITED; TIONE TRADING INC; TLEX TECHNOLOGY LTD; TCM MARKETS LTD; TMS FINANCE LTD; TOBAFREE LTD.; TOP DYNASTY INC; TOPONE GLOBAL LIMITED; TORTOISE TECHNOLOGY LTD;

TRADEOPT INC; TRADESTATION CRYPTO LTD.;
TRADONA MARKETS INC; TRANS X MARKET
LTD; TRANSCONTINENTAL FREIGHT
SERVICES INC.; TRUE-C FOUNDATION;
TRUTRUST PAYMENTS LTD; TSING
CLOUDPHANT INC; TSL INVESTMENT
FINANCE LTD; TT FINMARKETS INC.; TTCHAIN
TECHNOLOGY LTD; TTL GROUP FOUNDATION
LTD; TTX FINTECH INC.; TXN CAPITAL
FOUNDATION; U S TOP ONE E-COMMERCE CO.,
LIMITED; U.S.A YUFUCHOO BEAUTY
TECHNOLOGY CO., LTD; UBI ASSET
MANAGEMENT LTD; UEWELL LTD; UK TRUST
(UKT) WEALTH MANAGEMENT LTD; UNIONE
LABS INC.; UNIPLAY GLOBAL FOUNDATION;
UNITED STATES DEPARTMENT OF
EDUCATION INFORMATION CENTER; UNITED
STATES DESCHROCK AGRICULTURAL
TECHNOLOGY DEVELOPMENT CO LTD;
UNITED STATES SILIAN MATTRESS
TECHNOLOGY CO., LTD; UNITY TRADITIONS
ENTERPRISES INC; UNIVERSITY OF
COLORADO; UNLIMITED VALUE COIN;
UOOBAL PTE. LTD.; URCYLA TRADING INC; US
JIE CHAO FASHION ALLIANCE
INTERNATIONAL CO., LTD.; US NEWBITINFO
TECHNOLOGY CO., LTD; US RISI TECHNOLOGY
CO., INC; US SEALY BEDDING INC; USA BERGE
HEITH CO., LTD; USA CARGILL FERTILIZER
GLOBAL HOLDING INC.; USA COMMERCE
NETWORK INC; USA DR.BRONNER'S INC; USA
HNK CHEMICAL INC; USA JIAGUO
BIOLOGICAL GROUP JOINT VENTURE LTD;
USA KING KOIL GROUP INC; USA MAX CROP
PROTECTION SCIENCES LTD; USA PEEK
BEARING INC.; USA SEKKO THUMB LTD; USA
SERTA HOME LIMITED; USA SIMMONS GROUP
FURNITURE CO., LTD; USA VOBAN LTD.; USA
WORLD CELEBRITY RESEARCH INSTITUTE
CO., LIMITED; USA YOUZHENG BIOSCIENCE
CO., LTD; USFINANCES LTD; USTAMP-STAND
LLC; UV MASTER INC.; VALERION

TECHNOLOGY USA CO., LTD; VALUEVISTA CO., LTD; VALURA DATA LABS LLC; VANFENEL LTD.; VANGUARD FX LTD; VANGUARDFIRST LIMITED; VANGUARDTRADE LIMITED; VANLI GLASS INC.; VANTAGE ETRADE LTD; VAPORRICE LIMITED; VEBSON LTD; VEELUME INC.; VEEPAY DIGITAL PAYMENTS LLC; VEETAO INTERNATIONAL FINANCIAL CO LTD; VEETAO INTERNATIONAL FINANCIAL CO LTD; VELOCITYPRO LTD; VENTO FINANCIAL LTD; VENTURES LTD.; VERBO CAPITAL LTD; VERITASTECH INC; VERTEX CATALYST FOUNDATION LTD; VERTEX LTD; VERVEBOX LTD.; VESPERLIFE LTD.; VIBECOMMERCE INC; VIOLET TRADING INC.; VIRCARD LIMITED; VIRTUCOGN TECH LTD.; VIRTUREYAIS TRADE INC; VISION RIGHT INDUSTRY INC; VOLCANIC CAPITAL LTD; VONZTEK INC.; VOX FOUNDATION LTD; VOYA FINANCIAL INC.; VOYAGE LTD.; VVANTAGE INTERNATIONAL LTD.; WAGECULLY E-COMMERCE GLOBAL INC.; WANBIAO INTERNATIONAL DIGITAL TECHNOLOGY CO., LTD.; WANG DE INTERNATIONAL CO., LTD; WARMSMILE TRADING INC.; WASABI GROUP LTD; WATERFALL BATHROOMS INC.; WAYWANT Q LTD; WCCTNYDY INC; WEIHE TRADING LIMITED; WELTCOIN; WEOWNCOIN INCORPORATED INC; WEPURCHASE LIMITED; WHALE LTD; WHALEFLOW GROUP LTD; WIDIN TECHNOLOGY INC; WILK DATA LIMITED; WINATALL LLC; WIND COMES LTD.; WINLINK LIMITED; WINTER WONDERLAND INC.; WINTERWINTER GROUP INC; WLHAG INC; WLTAP INC; WMAGIBIT LTD; WMBT FOUNDATION; WOKE E-COMMERCE INC.; WORACO LTD; WORLD ACADEMY OF ECOLOGY SCIENCES; WORLD CONFUCIANISM FEDERATION; WORLD NEW QUANTUM CHARITY FOUNDATION LTD; WORLD SOARING CROSS-BORDER TRADING INC; WORLDBLINK TRADING INC.; WOSOFE DESIGN USA INC;

WPAKE INC.; X DAO. LTD; X&F TEL INC; XBANK INNOVATORS SYNDICATE INC; XDY FOUNDATION; XENA TRADING INC; XIJIAN CO LTD; XIN ERVEN INC.; XINGCHENG TECHNOLOGY COMPANY; XINGHE TRADING INC.; XINGRUI BELLE INC; XINGXIAN E-COMMERCE LTD; XINHUIDA TECHNOLOGY INTERNATIONAL CO., LTD; XIXUAN WU INC; XOOEC SAFETY INC.; XUEDAI DAILY NECESSITIES CO., LTD; XUEIN TECHNOLOGY INC; XUNFENG E-COMMERCE INC; XY INDUSTRIES LIMITED; YAGA YINGDE GROUP LTD; YANGTZE TRADING CO., LTD; YANYI TRADE LTD; YAOYING INTERNATIONAL TRADING INC.; YCLOUD TRANSPORTATION INC; YELLOWWAVE INC; YIGII PRODUCTION USA INC; YIHANG TRADING INC.; YILAN TRADING CO., LTD; YIMAI INTERNATIONAL TRADING LIMITED; YIMIN TECHNOLOGY LTD.; YIMING NETWORK TECHNOLOGY CO., LIMITED; YIMING TRADING INC.; YINGER E-COMMERCE INC; YIWEI USA LTD.; YIYANG E-COMMERCE INC.; YLEHUB FX LIMITED; YOBO GLOBAL LIMITED; YOLANDALOLLIPOP TRADING INC.; YOLY MEDIA CO. LTD; YONGLI TRADING CO., LTD; YONGLLY TRADING INC; YOUMED HEALTH CORPORATION; YR&T TRADING INC; YSM TRADING INC; YUANCHANG FILM & TELEVISION MEDIA LTD; YUANCHEN BAOJIN INTERNATIONAL CO., LTD; YUANDING INTERNATIONAL TRADE INC; YUANXIN TRADING INC; YUCAI TRADING LIMITED; YUENLEE TECH INC; YUQILEI ELECTRONIC TECHNOLOGY USA INC; YUSNO TRADING INC; YUTOO TRADING CO., LTD; YUXIANGFU TRADE INC; YX PTE LIMITED; YY EMARKET INC.; ZENIYA LTD.; ZENTALIS INVESTMENT MANAGEMENT LLC; ZEPHIREX GLOBAL TECHNOLOGIES INC.; ZEROPARK EXCHANGE CO., LTD; ZETA CAPITAL (H.K.) LIMITED; ZHENG TAI INTERNATIONAL TRADE LTD; ZHICHUANGXIN INTERNATIONAL TRADE

<p>INC; ZHONGLV SHENGSHI GROUP CO., LTD; ZHONGSHI INTERNATIONAL INVESTMENT GROUP INC; ZHUHAI MARVIN TECHNOLOGY CO., LTD; ZHUIRI TECHNOLOGY CO., LIMITED; ZHUOCHEN INTERNATIONAL GOODS INC.; ZHUOYA TECHNOLOGY INC.; ZIEEO COSMETICS LTD.; ZKURODA YOUNG TRADE INC.; ZUNJING TRADING LTD.; ZUNKETS IFC INC; ZYMER TRADING LTD.; ZYN TRADING LIMITED</p> <p>Defendants.</p>	
<p>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</p>	<p>Case No.</p> <p>Div.:</p>
<p>COMPLAINT FOR JUDICIAL DISSOLUTION</p>	

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 2955, Denver, Colorado (the “17th Street Address”).

4. The 17th Street Address is a virtual mailbox operated by the management company Anytime Mailbox. 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. Anytime Mailbox did not consent to the use of the 17th Street Address by Defendants. Anytime Mailbox rented the 17th Street Address to a single individual for personal, as opposed to business, use. This 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 consent to use the 17th Street Address 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 online retail fraud, romance scams, 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 572 corporations and limited liability companies that list the 17th Street Address, Box 2955, 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

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.

16. Defendants also include multiple entities purporting to be colleges and universities, research institutes, and investment platforms, including the University of Colorado (ID#: 20211736727), Oman Investment Authority Ltd (ID#: 20251540828), and Smart Wealth Investment Academy Ltd. (ID#: 20251307343).

17. Some Defendants have also used names that are similar to well-known commercial brands or other public institutions, including MorganStanley FX LTD (ID#: 20241012169), Vanguard FX LTD (ID#: 20231967525), Paramount Global Inc. (ID#: 20241468260), US Sealy Bedding Inc (ID#: 20231861664), USA DR.BRONNER'S INC (ID#: 20191335507), USA SERTA HOME LIMITED (ID#: 20241474055), and United States Department of Education Information Center (ID#: 20221756031).

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 commercial 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 and the United States Securities and Exchange

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.

Commission, 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.

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 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 205 Defendants were created after the 2024 clarification of the law, and all Defendants continue to list the virtual mailbox as their registered agent address nearly two years later.

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

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

⁴ *Available at*

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

36. To obtain and use a virtual mailbox through Anytime Mailbox, 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 Anytime Mailbox—to receive mail on the user’s behalf. Federal regulations require a separate authorization for each person or business entity receiving mail through the mailbox.

38. With respect to the 17th Street Address, only one individual—Yilu Ji, a resident of Wuwei City, China—was authorized to receive mail at the address. Ji submitted a USPS Form 1583 solely on her own behalf as an individual. Ji did not disclose to Anytime Mailbox 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 Ji seek or obtain authorization to receive mail on behalf of any other individual or entity.

39. Anytime Mailbox 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 Anytime Mailbox’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 governmental agencies such as the United States Department of the Treasury and the United States Securities and Exchange Commission (“SEC”), 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 356 MSBs are registered to Box 2955 at the 17th Street Address.

50. Thus, hundreds of businesses 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.

52. Similarly, multiple companies registered at virtual mailboxes at 1312 17th Street have filed Form D notices with the SEC. A Form D is a notice filing used by companies claiming an exemption from federal securities registration requirements under the Securities Act of 1933, including offerings made pursuant to Rule 504 or Rule 506 of Regulation D or Section 4(a)(5) of the Securities Act.

53. For example, Defendants Able Research Technology Ltd (ID#: 20241502139), ChainTrade LTD (ID#: 20191778709), and NBCOIN INC (ID#: 20251588643) have each submitted SEC Form D filings from Box 2955 at the 17th Street Address.

IV. Many Defendants appear to have engaged in fraud.

54. 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 online retail scams, romance scams, and cryptocurrency investment schemes.

55. With respect to the Defendants named in the Attorney General's Complaints regarding the 17th Street Address, examples include the following entities.⁵

A. Business Imposter Schemes

56. The Attorney General has received multiple complaints from legitimate companies regarding imposter businesses formed or registered using the 17th Street Address.

57. As one example, the Attorney General received a complaint from Voya Financial Advisors, Inc., a Connecticut corporation, concerning a Colorado entity allegedly impersonating or misrepresenting affiliation with the company. The subject of this complaint is VOYA FINANCIAL INC (ID#: 20248219354). Its registered agent and principal place of business are both located at the 17th Street Address, Box 2955.

B. Romance Scams

58. The Attorney General has received and reviewed multiple complaints from consumers concerning a romance and cryptocurrency investment scheme associated with an entity at the 17th Street Address named PODA TRADE CO., LTD (ID#: 20241853055). There appear to be hundreds of thousands of dollars in losses associated with this entity.

A. One consumer reported meeting a man through an online dating application, who introduced the consumer to the "Poda" trading platform. The consumer observed that the company maintained a

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.

Colorado business registration and, relying in part on that apparent legitimacy, transferred substantial funds—primarily in cryptocurrency—to the company. The consumer reports losing two homes and all life savings as a result.

- B. Another consumer met a man through the same dating application, who quickly moved communications to WhatsApp and encouraged investment in the “Poda Trade” ecommerce business. The consumer reviewed the company’s Colorado registration and Certificate of Good Standing before investing more than \$170,000. According to the complaint, the company repeatedly demanded additional fees and ultimately froze the consumer’s account.
- C. A third consumer reported substantially the same pattern: meeting an individual through an online dating platform, investing more than \$100,000, facing repeated demands for additional payments, and eventually losing access to the account entirely.
- D. A fourth customer experienced the same sales pitch on a dating application inviting them to join the platform as a seller. This consumer recognized that this company was registered with the State of Colorado and reported it before investing any money.

C. Cryptocurrency Schemes

59. The majority of complaints received by the Attorney General involving Defendants concern cryptocurrency investment schemes, many of which 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 The following are examples of such schemes reported to the Attorney General involving Defendant entities at Box 2955.

60. Hessee Inc (ID#: 20248269727) and Hessee Capital Foundation (ID#: 20248269720) – The Attorney General received multiple complaints alleging that these entities operated together to deceive consumers.

- A. One consumer reported receiving a free \$500 trading credit through Hessee to learn futures trading. The consumer eventually paid

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

more than \$20,000 after the platform displayed large apparent profits but was unable to withdraw any funds without paying unexpected fees.

- B. Another consumer alleged that Hesse represented it was expanding into the United States from Australia using AI-driven trading technology capable of predicting trades. That consumer reported losing hundreds of thousands of dollars and suspected the operation constituted a pig butchering scheme.
- C. Another consumer reported that they lost over \$87,000 in the scheme.

61. EVENCOIN LTD (ID#: 20231861680) – A consumer was invited through WhatsApp to join an “Investment Experience Group” featuring a purported “Professor of Finance” claiming affiliation with Fundstrat. Over approximately two months, the consumer transferred approximately \$80,000 from Robinhood and Crypto.com into an Evencoin wallet and ultimately lost the funds.

62. ChainTrade LTD (ID #: 20191778709) – A consumer alleged that company representatives convinced the consumer to deposit more than \$10,000 into a trading account. The company then froze access to the account and demanded immediate payment from outside sources, threatening lawsuits, collections, and other consequences if payment was not made.

63. JWCJ FOUNDATION (ID#: 20251346912) – A consumer reported losing nearly \$500 after being persuaded to establish a trading account with the company and invest under the guidance of a purported “Professor.” After seeing initial apparent gains, the consumer lost access to the account and could not recover the funds.

64. Coin8 Exchange Ltd (ID#: 20241541463) – A consumer reported investing all life savings through the cryptocurrency exchange. The company allegedly refused withdrawals unless additional fees were paid. Even after borrowing funds from family members to pay the demanded fees, the consumer still did not recover the investment and remained out more than \$20,000.

65. TXN CAPITAL FOUNDATION (ID#: 20231175163) – A consumer reported being persuaded through WhatsApp communications to invest more than \$20,000 in a cryptocurrency exchange promising a tenfold return. The company allegedly refused to return either the original investment or any purported profits.

66. Aigm Financial Group Ltd (ID#: 20241277589) – The Attorney General received multiple complaints from consumers alleging losses totaling hundreds of thousands of dollars.

- A. One consumer initially succeeded in withdrawing funds from the platform but, after investing more than \$100,000, was repeatedly required to pay taxes, commissions, and other fees before eventually being informed that no funds could be recovered.
- B. Another consumer began investing with \$1,000 provided by the company, later invested \$30,000 of their personal funds after observing apparent success, and ultimately were unable to withdraw any funds from the platform.

67. 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.

68. 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.

69. 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.

70. 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)

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

72. 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.

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

74. 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

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

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

77. Many 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.

78. 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.

79. 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

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