

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

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CASE NUMBER: 2026CV31836

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

Plaintiff,

v.

360 PHOTO SPHERE STUDIOS INC.; 9MX GROUP
INC; A CHESTNUT LTD.; AAVE-LOAN; ABING
ELECTRONIC TECHNOLOGY INC.; ABLE
RESEARCH TECHNOLOGY LTD; ABRDN
CANADA LIMITED; ABTT INTERNATIONAL
LTD.; ACCURATE INC; ACME INTERNATIONAL
INC; ACR INVESTMENT MANAGEMENT
BUSINESS SCHOOL INC; ADFEVER TRADING
CO., LTD; ADGAI INC; ADIANT LOTUS
ENTERPRISES INC; ADT MARKETS LTD;
AETHERCODE AUTONOMOUS SYSTEMS LTD.;
AETHERIS TECHNOLOGIES LTD; AFONZO
PROMOTION INC; AGORAX INC; AI TRADING
LTD; AIASST FOUNDATION; AID FINANCIAL
LTD; AIEX CLOUD CULTURE AND
TECHNOLOGY CO., LTD.; AIGM FINANCIAL
GROUP LTD; AIMARKET LTD; AIQ LABS INC;
AIRLAND INC; AITOPX GLOBAL LIMITED;
AJNCOIN TECH LTD; AKB CAPITAL
FOUNDATION LTD; ALADDIN ECOLOGICAL
FOUNDATION LLC; ALGO PULSE
INVESTMENTS LTD; ALL WIN SUPPLY CHAIN
INC.; ALLBYCOIN; ALLSTAR HOMEWARE LLC;
ALLTECH INTERNATIONAL INC; ALPHA FUND;
AMCEBASE LTD; AMERICA VELTRAN BANK
CORP; AMERICAN BERRYLAND PLANT
NUTRITION CO., LTD.; AMERICAN BESTET
TECHNOLOGY CO., LTD.; AMERICAN CENTRAL
INSTITUTE OF TECHNOLOGY INC; AMERICAN
CHAIN LIBRARY FOUNDATION; AMERICAN
CORDIER GROUP LTD; AMERICAN KING KOIL

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HOME GROUP CO., LIMITED; AMERICAN KINWAI SMART TECHNOLOGY FURNITURE GROUP CO., LIMITED; AMERICAN LEISI GROUP CO., LTD.; AMERICAN SHUDA GROUP CO., LTD; AMERICAN SHUDA GROUP LTD; AMERICAN SHUNDE EXPORTS LIMITED; AMERICAN SILIAN INTELLIGENT TECHNOLOGY FURNITURE LIMITED; AMERICAN SQUIRREL ROBOTICS CO., LTD.; AMERICAN XINYU TRADING INC; AMPSON NUTRITION INSTITUTE, INC; ANDREESSEN HOROWITZ INVESTMENT TRUST LTD; AODANAICAI INC; APEX INNOVATIONS LTD.; APEXCRYPTO EXCHANGE INC; APEXGLOBE TRADING CO., LTD; APLUS INTERIOR SUPPLY, INC.; APOGEE LTD; APOLLO VENTURES TRADING LIMITED; APPWALLETS INC; ARCMED MEDIA CO., LTD; ARNARS TRADING LTD.; ARROW SPORT INC; ARTIAN CONSTRUCTION INC; ASIA DIGITAL ASSET EXCHANGE CENTER INC; ASIA INTERNATIONAL COMMODITY TRADING CENTER INC; ATCROSS GLOBAL INC; ATHENA HERA LIMITED; ATX QUANTUM ADVANTAGE LTD; AVEYAS INC; BABAK LTD.; BAIRUNDA TECHNOLOGY SERVICE CO., LTD; BAKER FUND MANAGEMENT LIMITED; BALLAPPART CAPITAL FOUNDATION; BAMIAN INTERNATIONAL TRADING LIMITED; BANLOLE TECHNOLOGY CO., LTD; BAO TMARKETS LTD; BARYANDE INC; BATECOIN LTD; BB&BARCLAYS GROUP LTD; BC CFD LTD; BC PARTNERS LIMITED; BCS RESEARCH INSTITUTE LTD; BCX FINANCIAL TECHNOLOGY CO., LTD; BEAUTYGLOW INC; BEAUTYHIVE INNOVATIONS LTD.; BECCA CONSTRUCTION INC; BELGO TECH LTD.; BERNIE INC; BEST COIN CO., LTD; BESTGOODS LTD; BETTER AND BETTER INC; BEZES INC; BGAMFX GROUP LIMITED; BIG BAO TRADING CO., LTD; BILLION MARKETS INC; BINGOOD GLOBAL TRADE INC; BITBJ LTD; BITCOINESE INC; BITFINGFX GLOBAL LIMITED; BITLAND

GLOBAL LIMITED; BITNEST LTD; BITTOCOIN
GLOBAL CRYPTO INVESTMENT FOUNDATION
LTD; BITTON EXCHANGE INC; BITWIN LTD;
BITYI INTERNATIONAL TRADE LTD; BLACK
CORE INTERNATIONAL ASSOCIATION LTD;
BLING HAIR FASHION COMPANY LTD.; BLUE
POINT GAMES INC; BLUE WHALE ECOLOGY
LTD; BLUESKY TECHNOLOGIES, INC.; BOKA
RIZTH CO., LTD.; BOOST SPORT INC; BOPOREA
TRADING LIMITED; BOSHENG TECHNOLOGY
CO., INC; BOWIN CO., LTD; BOZEI LTD;
BRAINWAVE CRYPTO LLC; BRANCH CAPITALS
LTD; BRANDON CONSTRUCTION INC; BRAVE
BEAR INC; BRIGHT GLOBE INC; BRIGHT TRADE
LIMITED; BRIGHTEN FOREX LTD.; BRILLIANT
DECORATION INC; BRISKANNA INC; BRITNEY
SKY INC; BUEFHEWE INC; BULLPROFITS
LIMITED; BUMBLEBEE FINANCIAL LIMITED;
BWS ALKALI INC.; BYEX TECHNOLOGY
LIMITED; CABEYES TRADING INC.; CABOEX
LTD; CACCIA INC.; CAESARS GLOBAL CAPITAL
LLC; CALINKON TRADE INC; CAMRY BRAND
MANAGEMENT CO., LTD.; CANTON LINK
TRADE LIMITED; CAPITAL GROUP FUND INC;
CAPITANO INC; CASHEL FINANCIAL
INVESTMENT CORPORATION; CAUSEY
CLOTHING LTD.; CBB CAPITAL FOUNDATION
LTD; CEPHALON INC.; CERBERUS CAPITAL
MANAGEMENT LTD; CFM. LTD; CG SIGN
GROUP INC; CHAINCLOUD TECHNOLOGIES
CO., LTD; CHAINTRADE LTD; CHANGYUE
SEMON INC; CHENG YU INTERNATIONAL
TRADE LTD; CHENHAO QIXIU INC; CHINA
(JIANGSU) HARDWARE CASTING
TECHNOLOGY INC; CHINBER LTD.;
CHOCOLATE PLANET INC; CHOU XIANG FU
SHI LTD.; CHRONOBEAT LTD; CINVEN
LIMITED; CITIZENS FINANCIAL GROUP, INC.;
CLARISONIC INNOVATIONS INC; CLARISONIC
INNOVATIONS TECHNOLOGY INC; CLEARLY
TRADING INC.; CLOUD GEEK EXPRESS LLC;
CLOUD-BITCOIN; CO STYLE INC.; COIN8

EXCHANGE LTD; COINCRAFT LIMITED;
COINGREW LTD; COINHOUSE INTERNATIONAL
LTD; COINLANCE TECHNOLOGIES INC;
COINLEEK LTD; COINLIFEE LTD; COINMUM
LTD; COINPARKS LTD; COINSUPERB LTD.;
COINTASTE LTD; COMFORTNOOK CO.,
LIMITED; COODUB LTD; COOYOO INC; CORA
DECORATION INC; COSMHEART INC; COTCITY
LIMITED; CROBWK TRADE INC; CROSS
INTERNATIONAL TRADE CO., LTD; CROSSCOIN
FUND LIMITED; CROSSEA VENTURES LTD.;
CRYPTONIX LTD; CRYPTORAX EXCHANGE INC;
CT INNOVATIONS INC.; CUBOBO LTD.;
CURIOUS PAWS INC.; CWJFDC LTD.; CYGNUS
LTD; CZRT SUPPLY CHAIN CO., LTD; D&L
INTERNATIONAL TRADING USA LIMITED; DALI
TRADING LIMITED; DANIEL TRADING INC.;
DASHREALM LIMITED; DATORAMA BOT
TECHNOLOGY LTD; DAVIDTEC INC; DAWEI
FOREVER STRONG INC; DAWINNEWMERICA
INC; DEANIC HOME PRODUCTS INC; DECHO
INTERNATIONAL LLC; DEFIWALLET-LENDING;
DEFM; DENTUSHINE INC; DENZAM INC;
DEPULE TECHNOLOGY CO., LTD; DESIGNED
DECORATION INC; DESON VALVE, INC; DEVIN
LANPAI IMPORT AND EXPORT INC; DEZZ
TRADING INC; DIGITAL CORPORATION;
DIGITAL CURRENCY GROUP LTD; DIGITAL
INVESTMENT BANK OF AMERICA INC;
DIGITAL WHALE TECH INC; DIGITRADET LTD;
DINGGUO INTERNATIONAL INC; DINGNENG
IMPORT AND EXPORT TRADING INC; DINGNUO
TRADING LIMITED; DINGPEI TECHNOLOGY
NETWORK LIMITED; DISEN INNOVATION
INVESTMENT INC.; DIYFORME TRADING INC.;
DLDJ FOUNDATION; DMFOREST
INTERNATIONAL INC.; DNM LTD; DODOCAT
LIMITED; DOME SKY TECHNOLOGY INC;
DONGFANG INTERNATIONAL TRADE INC;
DONOTA LTD; DOO PRIME FX LTD; DOTTORE
INC; DOUBLE CIRCLES. INC; DOUBLEFREE
TRADING INC; DOUVAJOGOSHOP INC;

DOUWAN DAOLE LTD; DOW CHEMICAL LTD;
DR FANG TECH LTD; DRAGON TECHNICAL
SERVICE LIMITED; DRAWSEE QUAN LTD.;
DREAM RING INC; DREAM STAR GLOBAL
HOLDINGS. INC; DREAMBEGINNING E-
COMMERCE INC; DREAMFORGE DYNAMICS
LTD.; DUDIDI INC; DUNG GROUP INC; DUOLE
DAILY CHEMICAL INC.; DUOMIFUN INC.;
DURHAM TRADING INC.; DWS ASSET
MANAGEMENT LTD; EAGLE WING
TECHNOLOGIES INC; EAGLE WING
TECHNOLOGIES INC; EAGLEVOLT
INNOVATIONS LTD.; EASICOIN FINTECH
LIMITED; EAST PACIFIC INVESTMENT
HOLDING CORPORATION LIMITED; EASY
COMMUNICATIONS INTERNATIONAL
TECHNOLOGY LIMITED; EASYFEX EXCHANGE
FOUNDATION LTD; EASYFUNDCOME INC;
EATON TRADE CO.,LTD; EBANG
COMMUNICATION LIMITED; ECO GLAM PRO
INC; ECOPLANETPRO GROUP LTD; ECOSCOIN
CAPITAL FOUNDATION LTD; ECOTERRA LTD.;
EDIKANI EBIKE LTD.; EDU TEK COMPANY LTD;
EECOINS LTD; EFSANE WEALTH
MANAGEMENT CONSULTING CO., LTD; EGGBIT
TECHNOLOGY LIMITED; ELEMENTARY
FURNITURE CO. INC; ELEMENTGUARD CAMO
CORP; ELITE TRADE PARTNERS INC; EMDIAL
LTD; EMERALD DIAMOND LTD; EMPSTY USA
INC; EONE TECH LTD.; EQUITYBULL LIMITED;
EQUITYRISE LTD; ESG ASSET HK
MANAGEMENT LIMITED; ESG ASSET
MANAGEMENT LIMITED; ESUNM INC;
ETHEREUM EXPRESS NETWORK LLC;
EURASIAN FRONTIER FINANCIAL CAPITAL
LIMITED; EURASIAN GOLD MERCHANTS LTD;
EVENCOIN LTD; EVOKE ELM LTD; EVOLUX
LTD.; EXCELCOIN LTD; EXCELLENCE TRADING
CO., LTD; EXSCOIN LTD; EXWORTH GLOBAL;
FANG ADORA INC; FANXY BIOTECHNOLOGY
INTERNATIONAL TRADE LIMITED; FANYIN
LTD; FAST VIDEO LTD; FASTESTCOIN LTD;

FAZIYO LIGHTING CO., LTD.; FEI ART COMMUNICATION INC.; FEIHU SULFUR (USA) MINERAL ELEMENTS CO., LTD; FEISHDEK LTD.; FENTANYL FOUNDATION; FFDC FOUNDATION; FFDDL TRADE INC; FIJUAN E-COMMERCE GLOBAL INC.; FINANCECHICAGO LTD; FINARA LTD; FINE INDUSTRY INC; FINOTRAX HOLDINGS LTD; FINSCOPE GLOBAL LIMITED; FINYRA TECHNOLOGIES INC.; FIRE RABBIT FOUNDATION LTD; FIREDRUMS INC.; FIREFLYSTOUT LTD.; FIRSTLIGHT GLOBAL TRADING INC.; FONSO PONYE INC.; FOREVER YOUNG MEDICAL TECHNOLOGY USA INC.; FOREX CHECK LIMITED; FOSMARA IFC INC; FOUND DAWN&FUTURE INC; FPEACE CO., LTD.; FRANK WU WORLD INC; FREE TRAVELBUG INC; FREEBOY INC.; FREEDOM ASSET MANAGEMENT (ASIA) LIMITED; FRESH GIFT INTERNATIONAL INC.; FROGBT TECHNOLOGY LTD.; FTK GLOBAL INVESTMENT CO., LTD; FULLVIBA TRADING INC; FULLY HOLDING LTD; FUTURAEDGE CAPITAL INC; FUTURE FOUNDATION LTD; FUTURE STAR FINANCIAL ASSETS MANAGEMENT INC; FUTURE VISION INC; FXOMD GLOBAL LIMITED; FX-SPEED PTE LTD; FXT CAPITAL FOUNDATION INC.; FXU SOLUTIONS LTD; FYRNAX GLOBAL LIMITED; GALAXY AI WEALTH INNOVATORS, INC; GAMIKI TRADE INC.; GARTRIP INC.; GAXEX LTD; GBG PAY LTD.; GBOT LTD; G-BOX TRADING INC; GCT GLOBAL HOLDING INC; GDBN LTD; GEA AUTO PARTS INC.; GECKO BROS INC.; GEFOLLY TECHNOLOGY CO., LTD; GEMINIBLU LIMITED; GENBELL TRADING INC.; GENERAL CATALYST LTD; GENSIS C16K SOCIAL MOBILE INC; GERMANY EASTER CHEMICAL CO., LTD; GIMOSARO LTD.; G-INFINITY LTD; GLAYTOS DIGITAL ASSETS INC.; GLIMMERGLEAM TECHNOLOGY INC; GLOBAL DIGITAL CAPITAL LTD; GLOBALNEX INC.; GLO-TECH COMPANY LIMITED; GOING START INC.;

GOKYE LTD; GOLDEN AGE FOOTBALL;
GOLDEN FEATHER EXCHANGE LTD; GOLDEN
PROSPERITY COMPANY; GOLDPOCKET INC;
GOOSE FARM CO., LTD; GORGETUMN INC.;
GOUT TECHNOLOGIES INC; GRACEHOMEE
MING LTD.; G-RAPID LLC; GRAVITATIONAL
SPACETIME LTD.; GREATCAKESMCN INC;
GREEN LEAF INTERNATIONAL TRADE LTD;
GREEN MORISHGRE INC; GREEN YUMSEM
INC; GREENHILI & GCLLP. INC; GROKCOIN
GROUP LIMITED; GROSVENOR INTL TRADE
INC.; GS OUTLETS TRADING SERVICES CO.,
LTD; GSMARTECK E-COMMERCE INC.; GT
CARZONE INC; GTCR INC; GUANGHUI
TECHNOLOGY LTD; GUIBERSON DYNAMICS
INC.; GZHYS LIMITED; HABSO STORAGE
FURNITURE LLC; HANDMADE TRADING LTD.;
HAOHUIDA TECHNOLOGY CO., LTD; HAVE
HAIPI LTD; HAZZTON TRADING INC; HD CAR
ACCESSORIES INC; HEALINGMOSEY INC;
HEARTBRIDGE FOUNDATION; HEARTLINK
FOUNDATION; HEAVENXD INC; HEHEE
FOUNDATION; HENDERSON GROUP LTD;
HENGCHUANG TRADING CO., LTD;
HENGDESFX LTD; HERLLEN TRADING INC;
HEROGAMS TECHNOLOGY INC; HESSEE
CAPITAL FOUNDATION; HESSEE CAPITAL INC;
HI FUN TRADING INC.; HIFIVE FOUNDATION;
HIGH TRADING INC; HIGHTALL GLOBAL
TRADE INC.; HILL BOULDER LTD; HIPLUS
NUTRICOSMETICA INC; HOMIKRA INC.;
HONCHE GOLBAL INC; HONG KONG STARTUP
ECOLOGICAL AGRICULTURE GROUP LIMITED;
HONG KONG ZHONGJIA BIOTECHNOLOGY
LIMITED; HONG YI TRADING CO., LTD;
HONKITAA INC.; HORCARM LTD.; HORIZON
CAPITAL GROUP INC; HORIZON HEALTH
TECHNOLOGY LIMITED; HOSBROS INC.;
HOTOK LTD; HOWELL INTERNATIONAL
HOLDINGS CO., LTD; HPEX LTD; HRTC GLOBAL
INC; HUAGUAN FIAS INC; HUAHONG IMPORT
AND EXPORT TRADING INC; HUAYU

TECHNOLOGY INC; HUGGY COMMERCIAL LTD;
HUGO CROSS BORDER TECHNOLOGY CO., LTD;
HUIHUA INTERNATIONAL TRADING CO., LTD;
HUIMING DESIGN INC; HUIXIN HOME
FURNISHINGS CO., LTD; HULE VIRTUAL
ENTERTAINMENT LTD; HYAGRO
BIOTECHNOLOGY INC.; HYDRA
INTERNATIONAL TRADE CO., LTD; HYHLB
LIMITED; HYPERHAUL INTERNATIONAL INC;
HZBLSM INC; IBBCLEAN LIMITED; ICAHN
ENTERPRISES INC.; ICARUS LABS LTD; ICARUS
LABS LTD; ICEBLUE INTERNATIONAL LTD.;
ICECO TRADING INC.; ICG CAPITAL LTD;
ICHCOIN TECH CORP.; IDEACRYPTO
EXCHANGE LLC; IKUN FURNITURE INC.;
INFINITE FUTURE LTD; INFINITY HORIZON
ENTERPRISES INC.; INFINITY TECHNOLOGY
LIMITED; INOVERGESO INC.; INSIGHTQUANT-
AI TECHNOLOGIES INC.; INTELLI QUANTIFY
HUB LTD.; INTELLIBYTE LTD;
INTERNATIONAL YOUTH BONE HEALTH
ASSOCIATION; INVESCO FUND MANAGEMENT
COMPANY; INVESTEARN LTD; INVESTWFG
LTD; INVESTWOLF LIMITED; IREALGARDEN
INC; ISAAH CONSTRUCTION INC; ISLAND JOY
INC; ISRAEL KANGBAF CROP PROTECTION CO.,
LTD; ITECH MEDIA LIMITED; ITXXY
FOUNDATION LTD; IWAWA INC.; IX CAM
GROUP INC; JALIKING E-COMMERCE GLOBAL
INC.; JANNOUX TRADING INC.; JARCOIN TECH
CORP.; JAYHOO CO., LIMITED; JAZHOPE
TRADING INC; JDG-GAME STOCK GROUP LTD;
JHMFx GLOBAL LIMITED; JIABEI INC.;
JIAZHUO INTERNATIONAL TRADING INC;
JINBOWEN INDUSTRIAL TECHNOLOGY INC;
JINGXING TRADE INC; JINJUN
INTERNATIONAL TRADE LIMITED; JINNING
TRADE LTD.; JIUSHIEN TECHNOLOGY INC.; JK
EXTENSION TECHNOLOGY LIMITED.; JKBAIGE
SUPPLY CHAIN LTD.; JMEX LTD.; JOINGO
GLOBAL TRADING INC.; JOLLY DEPOT INC;
JOY POND TRADING INC; JRH LTD; JUMOFF

BLOOM LIMITED; JUMPLE FX LIMITED; JUNE INTERNATIONAL TRADE LTD.; JUNXING LTD.; JUYING ASSET MANAGEMENT LTD.; JWCJ FOUNDATION; K.D.S INC; K2 GLOBAL INC; KAIJIN MACHINERY TRADING INC; KAKUCOIN LTD; KALANDER INC.; KANGSHAN DEPARTMENT CO., LIMITED; KAYC TRADING INC.; KEETA LTD; KEGAT INTERNATIONAL TRADING INC; KEKEE TRADE INC; KEQU PARTY SUPPLIES LTD.; KERORO DECORATION INC; KESIONTT TEC INC; KIMBERLEY TRADING INC.; KIMI TECHNOLOGY CO. LIMITED; KKR PRO LTD; KKR-TOP; KKTOP INTERNATIONAL TRADING CO., LTD.; KLEIN LABS LTD.; KOALA REMIT (HK) LIMITED; KODDPA LTD; KODDPW LTD; KOTENG TECHNOLOGY LTD.; KREATIVTOYS TECHNOLOGY INC; KUY COIN LTD; L LOOK AHEAD LTD; L T. ONE HEALTH INC; LA JIEMEITE TECHNOLOGY INC.; LABONTI LIMITED; LAKEWOOD UNIVERSITY; LAMA TECHNOLOGY (US) LIMITED; LAOMENIE INTERNATIONAL TRADE INC.; LAVASTRA INC; LAYWELL TRADING INC.; LAYYOUU INTERNATIONAL INC.; LBM INDUSTRIES, INC; LCVTOS INC.; LEACREE COMPANY; LEAD PAY USA INC; LEAFORA NATURALS INC; LEAO CAPITAL ADVISOR LTD.; LEAO CAPITAL LTD.; LEBEN ELECTRONICS LTD.; LEFTSTAR E-COMMERCE INC.; LEMAI ELECTRONICALLY TRADING INC; LEMON SOFTPRY INC; LENOS CORPORATION LIMITED; LEXO EXCHANGE INC; LGM MARKETS GLOBAL FOREX LTD; LHABBETTVIEW FINANCIAL LTD; LI MAO INC; LIANHE TECHNOLOGY CO., LTD; LIAOHUAYUAN LTD; LIBERTY FRONTIER INNOVATIONS CO; LIBERTY TRADE PARTNERS INC; LIBERTYART CO.; LIBERTYLINK TRADING LIMITED; LIBFX LTD; LIDCOIN TECH CO., LTD; LIGHTKEEYS LTD.; LIGHTSPEED INC; LIKESCOIN LTD; LINGHAI INTERNATIONAL TRADE CO., LTD; LINGYUN BLOCK LTD;

LINLAIKEJI INC; LISSE INTERNATIONAL TRADING COMPANY LTD; LISUOKEJI INC Defendants.	
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 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 569 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

16. Defendants also include multiple entities purporting to be colleges and universities, research institutes, and investment platforms, including Lakewood University (ID#: 20221784595), American Central Institute of Technology Inc. (ID#: 20231812923), and FTK Global Investment Co., Ltd (ID#: 20248054113).

17. Some Defendants have also used names that are similar to well-known commercial brands or other public institutions, including Dow Chemical Ltd (ID#:

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.

20241524974), Invesco Fund Management Company (ID#: 20241510239), Citizens Financial Group, Inc. (ID#: 20241312602), Cephalon Inc. (ID#: 20231234383), and Clarisonic Innovations Inc. (ID#: 20241948781).

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 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.

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.

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 209 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.

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.

⁴ *Available at*

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

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 NBICOIN 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 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

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.

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. Hesse Inc (ID#: 20248269727) and Hesse 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 Hesse to learn futures trading. The consumer eventually paid 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

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

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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