

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

DATE FILED
May 20, 2026 12:49 PM
FILING ID: EDC097FFEA748
CASE NUMBER: 2026CV31838

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

Plaintiff,

v.

(SYT) FOOTBALL LTD; 357 GROUP LTD; 360
SMART PHOTO BOOTH INC.; 4KARSEEN LLC; A
THREE INC.; A WARM HUT INC; ABEX LTD.;
ACE PAY LTD.; ACHIVE DREAMS INC.;
ACNCOIN LTD; ADIA EXCHANGE INC;
ADORNME CREATIONS INC; ADTRIBOSON
BIOTECHNOLOGY R&D CENTER IN THE
UNITED STATES; AEMON TECHNOLOGY LLC;
AETHERIS DIVERSIFIED INC.; AETHERWAVE
INNOVATIONS LTD; AFU TRADING CO.,
LIMITED; AHA BOUTIQUE INC; AI
INVESTMENT EDUCATION FOUNDATION LTD;
AIBUG INC.; AIDATIFY LTD; AILAND TRADING
INC; AKASA TRADING LIMITED; AKQA
INDONESIA ADVERTISING LTD; ALEATY
TRADING INC.; ALENCOIN INC.;
ALEXANDRIAUS LTD; ALLIN CAPITAL INC.;
ALLWIN FASHION INC; ALPSWAN HOME
FASHIONS INC; AM SATOSHI DIGITAL GROUP
INC; AMBEREAST CORP; AMERICAN BUSINESS
ALLIANCE INTERNATIONAL MUTUAL
ASSISTANCE ASSOCIATION; AMERICAN CHCHI
GROUP CO., LTD.; AMERICAN CORNELL LIFE
SOURCE MEDICASCIENCES INC; AMERICAN
GO ASSOCIATION; AMERICAN HEALTH
MEDICINE INC; AMERICAN NATURAL SCIENCE
AND TECHNOLOGY; AMERICAN NEW STAR
TECHNOLOGY CO., LTD.; AMERICAN
OCCULTISM ASSOCIATION; AMERICAN WATS
VALVE GROUP; AMERICAN XIANGBOTE
TRADING CO., LTD.; AMERICANGASLOGS INC;

▲ COURT USE ONLY ▲

AMIR CO., LIMITED; AMIRIS INTERNATIONAL GROUP CO., LTD; AMOURAJEWELS STUDIOS LIMITED; AMZSSSHOP LTD; ANHAI TECHNOLOGY LIMITED; ANOVASKY LLC; ANPOOL LLC; ANROLANCA INC; ANT MAN INTERNATIONAL TRADE CO., LIMITED; ANT TRADING INC; AOKKR LLC; AOTO INC.; AOTOO INC; AOVING INC; APEXTOP TECHNOLOGY CO., LTD; AQUA FOUNDATION; ARBITRAGEFREE.COM; ARCHER CAPITAL FOUNDATION; ARIES HOLDING INC; ARITHFI INC.; ARKEX LTD; ARLINGTON ASSET INVESTMENT CORP LTD; ARREBOL INTERNATIONAL TRADING CO., LTD; ARREBOL TRADING INC; ASCEND TRADE INC; ASPEN TRAIL INC.; ASTERA CAPITAL INVEST LTD.; ATDPAY PAYMENT INC; ATLANTIC TRADING CO., LTD.; ATLASPORTATION INC; ATLASTA INC; AURORA STORES INC; AUROVA INDUSTRY INC; AUSTRALIAN PLANT RESEARCH INSTITUTE BIOLOGICAL CO., LTD.; AZURE AI LIMITED; BAIGEDAILI CO., LTD; BAISHUO TRADING CO., LIMITED; BAO TMARKETS LLC; BARLEY INC.; BARON CAPITAL MANAGEMENT INC.; BEACHHEAD APPAREL CO., LTD; BEAUTY TRADING LLC; BEECHAM TRADE INC; BEETELCOM INFORMATION LTD; BEST WAY INC.; BEST WAY TRADE INC; BESTPAY INC.; BETA TECHNOLOGY INC; BETSY KEYAO TRADING INC; BETTER WORLD BUILDERS CHARITY INC; BIFYT INC; BINZHI STUDIO (USA) LTD.; BIOTECHNOLOGY RESEARCH LIMITED; BITCORE LTD.; BITLINE LTD.; BITLINK EXCHANGE LTD; BITON LIMITED; BITRIEXLTD LTD; BITSTREAM TECHNOLOGIES INC; BITTOKEN LTD.; BITVENUS; BIUBIUBIU LTD; BLACK LTD; BLACKROCK'S TRUST SERVICES (BRSTS) LTD; BLACKTHORN LIMITED; BLIDATA INC; BLOCKEL LIMITED; BLUE DIAMOND (USA) PAYMENT LTD; BLUE TRADING INC; BLUEPEAK INTERNATIONAL LIMITED; BOHAI LTD; BONWAY MARKETING

LTD; BORN WITH INC.; BOTOMANI M TECH LLC; BOUL DERY INC.; BRIGHT IMPORT LTD; BSRLOL INC; BTCXBANK FOUNDATION; BULUKE LTD; BURSTVERSE AI LIMITED; BYTEBRIDGE TECHNOLOGIES INC.; C & A INTERNATIOANL TRADE INC; C&Y TRADING INC.; CALA; CANDYBOX LTD; CANNA LNTERNATIONAL LNC; CAPCOIN CAPITAL LIMITED; CAPEWHALE INC; CARDEAL LTD; CARDFUL LTD; CARFIBO INC; CARSON FINTECH LTD; CASCADE HEIGHTS INC; CASTED FATE INC; CBADII TRADE INC; CCT HUB LLC; CENTURY GLOBAL GOLD CAPITAL LTD; CERESCARD LTD; CGPGREATFIRED INC; CHANGTENG INDUSTRY INC.; CHAOS PROTOCOL ECOLOGICAL MANAGEMENT FOUNDATION; CHARACTER DEV LLC; CHARLESQ INC; CHARM LIMITED; CHENGDU HIGH SCHOOL; CHENGDU SHISHI HIGH SCHOOL; CHENLIANG LLC; CHINA WOMEN AND CHILDREN'S DEVELOPMENT FOUNDATION; CHNGND TRADING INC; CHSHHUI TOP INC; CHUMOPH TRADE LTD; CINDY LEE INC; CIPESGROUP INC.; CITY FALCON TECHNOLOGY CO.LTD; CITY OF SKY LIMITED; CLARE COLLEGE; CLOUD LEOPARD INC; CML PRODUCTS LTD; CNMI INDUSTRIAL INC.; CODE COLLEGE; CODEFORCE TECH OUTSOURCING LIMITED; CODELTA INTERNATIONAL TRADING CO., LTD; CODETG INC; COIN CHIEF LIMITED; COINHIBT FINANCIAL LTD; COINMASKE LTD.; COINSOUK LTD; COLGATE UNIVERSITY GLOBAL; COLORADO ENGINEERING UNIVERSITY; COLORADO FOUNDATION; COLORADO SUBTLE ENERGY RESEARCH UNIVERSITY; COMOCOTTON INC; CONOCOPHILLIPS INTERNATIONAL LIMITED; COOP LTD.; CORS PROCESS CONTROL TECHNOLOGY CO., LTD; COWBULLSTRONG LLC; CROSOFMI INC; CROSSOCEAN COMMERCE INC; CRYPTO QUANTUM FUND; CRYPTOASSURE

TECHNOLOGY LTD.; CTER ONLINE INC; CTIME INC; CULINARYFUSION FOOD CORP; CXJ TRADING INC; CXRAJKHANDRE INC; CXT EXCHANGE TECHNOLOGY AND MANAGEMENT LTD; CY MAKEUP INC; CYBER FRIDAY INC; CYBERSUN LTD.; CYOU TECHNOLOGY INC; CYPRINE MARIITA LLC; DAHE INFORMATION TECHNOLOGY INC.; DAISHU ROONOVA LEAPCPRE INC; DALIAN AIDE INC.; DAMING CULTURAL COMMUNICATION LTD; DDC PRIME INC; DEBEISITE E-COMMERCE CO., LTD.; DEEPEX INC; DELI DELIGHTS FOOD CORP; DEMASH INDUSTRIAL EQUIPMENT CO., LTD; DEP ECOS LLC; DESHENG TECHNOLOGY CO., LIMITED; DETEX LTD.; DEUS TECHNOLOGY CO LTD; DIGITAL BEATS INC.; DIGITAL CURRENCY ELECTRONIC PAYMENT; DIGITALIQ LLC; DIKUR TRADING LLC; DILAZAD LTD; DINGDIAN TECHNOLOGY INC.; DINGYUAN TECHNOLOGY LTD; DISCOVERTECH LLC; DIWEN NETWORK INC.; DLEESA BATH INC.; DONI INNOVATION INC.; DOUBLEEASN INC; DRAGON DREAM LTD; DRAGON GATE INC.; DRAGON TOKEN FOUNDATION; DREAM RECORD TRADING INC; DREAM YOUNG CORPORATION; DUALTREND GROUP INC.; DUBAI SAKER INTERNATIONAL HEALTH RESEARCH INSTITUTE INC; EAC WEALTH FINANCE INC; ECHOES RESONATE TRADING INC; ECLIPSE FRONTIER INC; ECLIPTEK INC; ECOGEAR LLC; EDIBLEELEGANCE FOOD CORP; EDMUND ROTHSCHILD ASSET MANAGEMENT LTD; EDS HOLDINGS LIMITED; EEMNE LUNGZ TRADING INC; EGY INTERNATIONAL LOGISTICS INC; EJDY TRADE INC.; ELEPHANT LTD; ELITE GEAR INC; ELKCIP LLC; ELOV KJHFHEKFBH TRADING INC; EMERALD LIMITED; EMPIRETIP TRADING INC; EP1PHANY INC; ERCUS LTD.; EROSIA USA INC; ESSOGO LLC; ESTEE LAUDER INSTITUTE OF AESTHETIC INC.; EVELVE; EVERESTLURE LLC; EVERHILLS INC; EVERVITA INC.; EVOTRADE

OPTIONS; EZREALSHOES INC.; FABELUS LIFE INC.; FAIRY YUAN INC; FALCON LTD; FAN YIN BO LANG INTERNATIONAL INVESTMENT CO., LTD; FANKUN INTERNATIONAL BUSSINESS CO., LTD; FANSVALLEY LLC; FARBA MERAZ TRADING INC; FASHIONFUSIONCO INC.; FAST SEA TRADE LTD; FATHOM INVESTMENT LIMITED; FBX LIMITED; FEEKA SHOWROOM LTD.; FEELIFE TRADING INC; FEY TEDING TRADING INC; FFA WHOLESALE, INC.; FILLE MJS INTERNATIONAL LIMITED; FINX EXCHANGE LIMITED; FIRSTCOIN LTD.; FISHIE WIJERKIN INC; FIVE DIGIT LUN INC; FLAMMA FUND INC; FLOURISH INTERNATIONAL INC; FLOWER JEWELRY INC; FLYCARE INC.; FORBIDDEN TREASURES ENTERPRISES, LLC; FORD FOODS CORP; FORNEWVALUE INC; FORTUNE MAKER INC; FOUR ELEPHANTS INC.; FRAGRANCE COLLECTION COMPANY; FRANCA FENDI FAMILY LTD; FREE SPACE TRADE INC; FRESH CRAFT FOOD CORP; FRIEDENDT INC; FUNLUXURIES LIMITED; FURNITURE HAVEN INC.; FUSION STRATEGE INTERNATIONAL INC; FUTURE MOMENTUM; FUTUREBITX LTD; FUTUREX LTD; FUTURISTIC LLC; FXNN MARKETS LIMITED; G.SLAM CO., LTD; GALAXLDEA JEWELRY INC; GALAXY WALLET; GALLERY DEPARTMENT LLC.; GEARTNEEDWIN INC; GEEK USA LIMITED; GELACHARM INC; GENOLIFE BIOTECH INC; GERHOLD INC; GERMANY BERLIN UNIVERSITY OF MEDICINE; GLEEFACE INC; GLOBAL CHAIN MERCHANTS LTD; GLOBAL COVERAGE TRADING INC.; GLOBAL SHOPPING INC.; GLOBAL VOGUE INC; GLOBALCRYPTOUS LTD; GMR MARKETING LTD.; GOGOHIBT FINANCIAL LTD; GOGOTALK. LTD.; GOKASHIN LLC; GOLD COLLAR SPEED MATCHING FINANCIAL LIMITED; GOLDEN GATE TRADING CORP; GOLDEN VELOCITY INTERNATIONAL LIMITED; GOLDSMITHS UNIVERSITY; GOTO TECH CO., LTD; GOURMETELEGANCE FOOD

CORP; GQJABELHARPE INC; GRANDSHINE TRADING CO., LTD.; GREENHARVEST FOOD CORP; GRIEVANCE INC; GUOCHUANG SECURITIES LIMITED; GUOTAI WALLET INC; GUTH (USA) CO., LTD.; H-ABLEAUX GROUP INVESTMENT MANAGEMENT CO., LTD; HACKNEY MARKETING LLC; HAILINGSHAN INTERNATIONAL INC; HAIPINGGASSY INC; HALO CAPITAL LTD.; HANCASH FINANCE; HANDY WAY INC; HASSLA CAPITAL PTY LTD; HEARTBEAT ENTERTAINMENT INC; HENGERLI INC; HFJD JHKSH TRADING INC; HGUOHUI TRADE INC; HICHIC INC.; HILIVESGIFT INC; HILLFLAGAM INC; HIPPIH GROUP USA INC.; HOEA LTD; HONGDA INC; HONGKONG VTRADING TECHNOLOGY CO., LIMITED; HONGRONG INC; HONGWA TRADING INC; HONGYI TRADING CO., LTD; HONOR WELL INC; HOPOPAY LTD; HUALIU INDUSTRIAL INC; HUAXIN TECHNOLOGY LIMITED; HUIONE GLOBAL LTD; HUIYING. LTD; HUSDOW ELECTRONIC TECHNOLOGY LLC; HUZIN POZYN TRADING INC; HYPERX FOUNDATION LTD; IDSST DECENTRALIZED EXCHANGE; IFTIKHARH TECH LLC; IJEX EXCHANGE LTD; IMPERIAL COLLEGE; IMPETUP INC; IMPOSSIBLE TRIANGLE INC.; IN THE TREND INC.; INFINITE FOCUS LTD; INNOLAB LLC; INNOSTAR INC; INNOVUS CO. LTD; INNOVWAVE TECHNOLOGIES LTD; INSECEX TRADE. LTD; INTELLIGENT DATA PRODUCTS INC; ISEIU TRADING CO., LTD; ISRAEL HALFO CHEMICAL INDUSTRY COMPANY; IVANKA LIMITED; IVEY AND HYDE TRADING INC; IWM INTERNATIONAL MALL AMERICA CO LTD; JAMES FAO LIMITED; JAMES MASAI LTD.; JAPAN YAMADA LIFE RESEARCH INSTITUTE PHARMACEUTICAL INC; JAPANIEO LTD.; JASPER FINANCIAL CAPITAL LIMITED; JAWORKS LLC; JAY GIFT CARD LTD; JCLOUD AROMA TECHNOLOGY INC.; JE OVERSEAS LLC; JIA QI LIMITED; JIAKANUO INC; JIANGSU

KANGBAO PHARMACEUTICAL CO., LTD;
JIECHANG TRADING INC; JIEDIAN INC;
JIEYUN TRADING INC; JIFENG LLC; JIFENG
TRADING INC.; JINKER(USA) HOME
INTELLIGENT TECHNOLOGY INC; JINWENYOU
TRADING INC; JINX CULTURE MEDIA LIMITED;
JINYAN TRADING CO., LTD; JOYMOTION
FUTURES LTD; JP ELEC LTD; JUFU NETWORK
TECHNOLOGY CO., LTD.; JUMBE P TECH LLC;
JUNPAN LLC; JUYING CULTURE MEDIA CO.,
LTD; JYPLAYER LTD; K CORPORATE SERVICES
LTD; KAILYSHOES INC.; KAITAIPING INC.;
KAIXIN ELECTRONICS LIMITED; KAKUNI INTL
LIMITED; KANGBAO INTERNATIONAL
PHARMACEUTICAL INC; KATUSIE TRADING
INC; KELLYEE INC; KENROBB MIRAGE INC;
KERSULITE LTD; KESNY PDING TRADING INC;
KESSELE INC; KING KOIL (USA) GROUP
INTERNATIONAL BRAND LTD; KING VAN
TRADING LLC; KINGDREAMWJK INC;
KINGJEFF JEWELRY INC; KINGSDA
ADVANCED MOBILITY MATERIALS INC.;
KINGSOLDTAO LLC; KIYUCH TECHNOLOGY
CO., LTD; KNIGHT RUBBER INDUSTRIES INC;
KOREA PU YAN BIOTECH RESEARCH
INSTITUTE; KUNCHEN INC.; KYRGYZSTAN
(HANGZHOU) MEDICAL CONSULTING LTD;
LAMAR ODOM ANTI-DRUG & RECOVERY
EMPOWERMENT FOUNDATION; LAND GUARD
GARDEN INC; LANDSEN GROUP LIMITED;
LANDXES MEMBRANE TECHNOLOGY CO., LTD;
LAOJIUHUA INC; LARTOO BOUTIQUE INC.;
LDY FACTORY INC; LE TRAN COMPANY LTD;
LECHANG INNOVATION TECHNOLOGY LLC;
LELE COMMERCE INC.; LEMO GOULD BIOL
INC.; LEONARDO TRADING INC; LETEK
FITNESS INC.; LETEK WODBOX INC; LEVAO
INC; LIANBANG DIGITAL TECHNOLOGY CO.,
LTD; LIANDA TRADING INC; LIANGCC INC.;
LIANGWEN INC; LIANWEI COMMERCIAL INC;
LIBERTY PEAK MEDIA LTD; LIDETRADE LTD;
LIGHTING EQUIPMENT FACTORY INC;

LIGHTNING EXCHANGE LTD; LIN YUAN E-COMMERCE LLC; LINENS TRADING INC; LING TRADING INC.; LINKROAD LIVES INC; LITTERTALLDH LLC; LITTLEBEE TRUST US LIMITED; LIURENSP LLC; LJ HOME GROUP INC; LONGMAY TRADE LLC; LORIU USA INC; LOSIONIC INC; LOUISFONSY LTD; LQXSHOWSJS INC.; LULUSTATION INC.; LUMAMAI PTY. LTD; LUNALEDGER PTY. LTD; LUOWENYAN LLC; LUSTER INTERNATIONAL INC; LUYE FOOD CORP; LXSJING INC; M.E SUNZYMEE LTD; MAGCYAN INC.; MAGICS RADIANCE LLC; MAKABAKA INC; MANGO LIMITED; MAPLE STILL INC; MARYLIMA LTD; MASTERY MART HOME INC; MATRIXAI INC.; MAXSTRATEGY LTD; MEGASTAR VC GLOBAL LTD; MEIBANG MEDTRONIC MEDICAL EQUIPMENT INC; MEIBANG WANTAI MEDICAL EQUIPMENT INC; MEIBIT LTD.; MEIMEI WEST INC; MEIXUEMEI INC; MESTY LNEGZ TRADING INC; MICROEX CAPITAL INTERNATIONAL; MIKENZOEX LTD; MINDFORGE LLC; MINDSHIFT INC; MINGDE INC; MIXS GLOBAL LTD; MLKJ INC.; MNG FILM PRODUCTION & INVESTMENT CO.LTD; MOBIUSHIVE LTD.; MOCARD LTD; MOHEED ABDUL TECH LLC; MOMENTUM CORE INC; MOMENTUM FOUNDATION LTD.; MONEY MAKER E-COMMERCE LIMITED; MONISSAS INC; MONVIA LLC; MOONSHYA INC; MOSNEAT INC; MROOW LIMITED; MTSEEN TECH LLC; MU CHURCH CO., LIMITED; MUGEYIYU INC; MUSECHAIN GROUP INC.; MUST WIN LLC; MYCASTO TECH INC; MYSTERY BOXING INC; MYTH REALM INC; MZKBRAND INC; NADAQI INC; NAHEEDA LLC; NANA FOOD INC.; NANCY JONES INC; NATIONAL ACADEMY OF SCIENCES, ARTS, AND HUMANITIES; NATIONAL EXCHANGE DIGITAL TOKEN REGISTRATION AND SETTLEMENT SERVICES LLC; NATURELIFE VITALITY INC.; NAVIGATION LINTERNATIONAL TRUST LLC; NENGAY LLC; NEW YORK KONLON

ELECTRICAL CO., LTD; NEWTRANTS BIOTECH INC; NEXUS AURA INC.; NEXUS TRADE INC; NEXUSAI LINGXI INTELLIGENCE. LTD; NEXUSFUSION TRADE INC; NEXYPLANET INC; NFT TACTICS INC.; NICHE LAB LTD; NINEHOME INC; NINGDE INC; NONPROFIT EMPOWERED NETWORK INC; NOOBEX FOUNDATION; NOTONLY INC; NOVABRIDGE INTERNATIONAL INC; NOVAHORIZON LTD.; NOVOPUS LIMITED; NVZX TECH LTD.; OASIS GROUP INC.; OASIS GURUHI UZ E COMMERCE LIMITED; OASIS TECHNOLOGY LLC; OCEAN MEDIA LTD; OCEANIC BLISS TRADING INC; OCEANSTAR E-COMMERCE INC; OFFICIALSHOP ABCXYZ INC.; OLD PLACE POLY LLC; OLEON TRADING INC; OPINIONEWS LLC; OPTICREV LIMITED; ORANGE CHUAN INC; ORIGIN INNOVATION LLC; OUTLETS GROUP GLOBAL DIGITAL ECONOMY CO., LTD.; OWNLIFF INC; PALATE PURSUITS FOOD CORP; PALONE INC; PAMELINA LLC; PANTASELECT GROUP LIMITED; PARACOSM USA LLC; PAULITE VALVE CO., LTD; PAXA TECH LIMITED; PAYPEX INC; PEAKORMAN LLC; PENGKUN LLC; PERFECT WORLD TOUR LTD; PEST MASTER INC; PESTCON INC; PETOPIA PET PRODUCTS INC.; PETPOTTY LTD; PEXCHAIN TECH LTD.; PHOENIX ASCENT INC; PHOENIX TRADING INC; PHYNTEX GROUP LIMITED; PIN SUAN SUAN TECHNOLOGY HOLDING COMPANY LIMITED; PING FANGYU TRADING INC; PJ TECH LTD; PK MANHATTAN LLC; PLAY PULSE INC.; PLUSONE CAPITAL MARKETS INC; PMI TRADING INC; POEDAGARWATCH INC; POWBIT INC.; PQPRIME LIMITED; PRESENTSKI JEWELRY INC; PRETER INC; PRIME OPTICS CO., LTD.; PRINCIPLE INC.; PULSETTECH LLC; PUREASIS INC.; QBS HNMIU TRADING INC; QEUTRD INC; QHECOMCE INC; QIAOQIAOY TECH LLC; QIJIN MEDIA INC; QILE CO., LTD; QINGSE NETWORK INC; QINGYI INTERNATIONAL INC; QITENG

TRADE CO., LTD; QPC SEMICONDUCTOR INC;
QUANTUM X GLOBAL CAPITAL LLC;
RABBITHOLE. LTD; RARLON CULTURE MEDIA
CO., LTD.; RAYCHELLE INC.; RAYMOND JAMES
FINANCIAL INC.; RAZOO INC; RBHGROUP;
REAPS PHARMA LLC; REAYOU ELECTRONIC
COMPANY LTD.; REDREAMIDX INC;
REDSTONE MEDIA CO., LTD.; REEBOK TYCO
INC; RELYS TRADING INC.; REWE LTD.; RIDGE
CORPORATION LLC; RISING CLOUD TRADE
INC; ROCK BROTHER INC; ROUIDSANP LTD;
RUBY LIMITED; RUI TIAN YUAN LIMITED;
RUIGOO HEALTH INC; RYLAN WATCH CO.,
LTD.; S&P GROUP INC; SALLY S MARKETPLACE
LTD; SAMDREAM TRADE INC; SAPPHIRE
LIMITED; SATOSHI NAKAMOTO UNIVERSITY;
SAVVY TRADE LLC; SCRTV FILM INDONESIA
LTD.; SCKT TRADE INC; SEA ONE COMMERCE
LTD; SECURE GLOBAL SYNCHRONIZED FX
LIMITED; SEE THE MIRAGE INC.; SEMI PRO
TECH. LTD; SENMAO TECH LLC; SET SAIL
TRADING INC.; SFEPAY CO.,LIMITED;
SHABIRANBIBI LLC; SHAHID LLC;
SHALLYULAN LTD; SHAREBY LTD.; SHENG
XIONG TRADING CO., LTD.; SHENGZHEN TECH
INC.; SHENYOUNG GROUP INC.;
SHENZHENSHIRONGHUANGSHIYEOUXIANG
ONGSI INC; SHEPHERD TRADING CO., LTD;
SHEXIANG INTERNATIONAL TRADING CO.,
LTD; SHINKEN OF SWORD LLC; SHONY BROWN
TRADING LIMITED; SHOPA LTD; SHRRW INC.;
SHUDA(USA) HOME TECHNOLOGY SLEEP INC;
SIEMID AUTO PARTS CO., LTD.;
SILVERYWINGEL INC; SIMA TRADING INC.;
SIMMONS (USA) GROUP CO., LTD; SINO
TRADING CO. LTD; SIOYIE LIMITED; SKY
ANGLE INC; SKYSTAR E-COMMERCE INC.;
SMART WALLET INC; SMARTGEAR LLC;
SNOWBALL FAMILY CO., LTD; SNOWPEAK
TECH LIMITED; SO SUNSHINE INC; SOLIDLINK
INC.; SOUL READER NETWORK INC; SOUTH
GATE TRADING CO. LTD; SPARK MEDIA LTD;

SPIDER ECOLOGY RESEARCH INSTITUTE INC;
SPIERHEXIAOY INC; SPRING ROLLING INC;
STAR DREAMLAND LTD; STARKWARE CLUB
LIMITED; STARLIGHT TRADE INC.;
STRONGDRGONJL INC; STRZY ONGTN
TRADING INC; SUBSTANBO INC.; SUISUI
TRADE INC; SUNCRO ENTERPRISE
INTERNATIONAL LTD; SUNIRAYY INC;
SUNRISE TECHNOLOGY CO., LIMITED;
SUNSTAR MEDIA LTD; SUPER PANDA TECH
INC.; SUPERIOR HOME & GARDEN INC;
SUPERIOR UNIQUENESS LTD; SUPERSONIC
TECHNOLOGY INC; SUPERVISED BY
ENSKWEI PHARMACEUTICALS IN THE
UNITED STATES INC; SURE WELL INC; SUW
INTERNATIONAL LOGISTICS INC; SUZAKU
COMPUTING CO., LTD; SUZHOU CARTER
TECHNOLOGY INC; SWEETHARVEST LLC;
SYNOVUS FINANCIAL CORP.; TAKE OFF
TRADING INC.; TARGET DISTRIBUTION INC;
TASTE BUDS CATERING LLC; TASTEVOYAGE
FOOD CORP; TAUSEEOP LLC; TECHHUBB LLC;
TECHSCULPT INC.; TENG COOKING LLC;
TENGHUI INC; TENGLU TECHNOLOGY CO.,
LTD; Terecoin INTERNATIONAL
CRYPTOCURRENCY TRADING CO., LTD;
TERRAVISTA INC; THE FLOWER WALL
COMPANY LTD; THE UNITED STATES
FEDERAL COMUS INSTITUTE OF
OPHTHALMOLOGY; THE USA DENNIS
INTERNATIONAL PHARMACEUTICAL INC;
THREEFOUR INTERNATIONAL TRADE INC; TI
SECURITIES LLC; TIANHUI TECHNOLOGY
LIMITED; TIANQI LIMITED; TIKAI ST INC; TIME
ENTERTAINMENT LTD; TISVAY INC; TIWELL
INC; TKGOGO INTERNATIONAL LIMITED;
TMACTIME INC; TOKTOK LIMITED;
TONGRENTANG HEALTH INDUSTRY
PHARMACEUTICAL LTD; TOPAZ LIMITED; TOPI
TECHNOLOGY INC; TOPSHINE TECHNOLOGY
INC.; TOPUP DECORATION LTD;
TRANSGLOBAL NEXUS INC; TREASURE

FOUNDATION; TRENDS CREATOR GLOBAL LIMITED; TRIBAL FOREST INC.; TRIMAMEX CAPITAL GROUP LIMITED; TRIUMANT RESTAURANT LLC; TSHAN MARKETS PTY LTD; TTQP FOUNDATION LTD; TURING UNIVERSITY; TYRAN TRADING LLC; U.M.T INC; U.S.A SENZEBORNAE INC; U3 FINANCIAL INC.; UG FOOTBALL LTD; ULADY LIMITED; UNITED STATES KORAN MEDICAL BEAUTY PHARMACEUTICAL CO., LTD; UNITED TRADING COMPANY; UNIVERSAL INTERNATIONAL FINANCIAL SERVICES LIMITED; UNIVERSE TRADING INC.; UNLIMITED USA LTD.; UQPAY INC.; URBEAUTY INC; US JINKEER GROUP LIMITED; US OXFORD GENE INC.; USA AOKANG INTERNATIONAL PHARMACEUTICAL INC; USA ARROW GROUP TECHNOLOGY CO., LTD; USA FENGHENG MACHINERY & ELECTRONICS INC; USA GELINWEIER INTERNATIONAL ELECTRIC GROUP LIMITED; USA KANGMAILONG PHARMACEUTICAL CO., LTD.; USA NK GROUP LTD; USA PUREDIRECT BIOPHARMACEUTICAL CO., LTD; USA SEALY GROUP CO., LTD; USA SHENMU BIOTECHNOLOGY CO., LTD; USA SIMMONS SMART HOME INC; USA SIWOR LLC; USA TRUSNUS INC.; USA YANJI ORGANISM GROUP CO., LTD; USAMA SAJJAD LLC; USCHOICY INC; USLEMON INC.; VANGUARD TRADE INNOVATIONS LTD.; VANTAGEE TECHNOLOGY INC; VASTDY TRADING CO., LIMITED; VATINALLY LTD; VERACITY WEALTH (PTY) LTD; VERIACE INC; VEXFREE DEVICES LTD; VICTORIA INTERNATIONAL AGRICULTURAL INVESTMENT GROUP LIMITED; VIMANI LTD; VIMAX LTD; VINDARA LIMITED; VIVACOMPRA LTD; VKNDCBU BLOCKCHAIN TECHNOLOGY SERVICES CO., LTD.; VTON INTERNATIONAL GROUP INC.; WAEA TECHNOLOGY INC; WANGHUO LTD; WANGLONG INC; WANRUN TRADING INC; WANWANG INC; WASHINGTON MEDICINE LTD;

WATTRGY INC; WDM MARKETS LTD; WEALTH SKY BOND., LTD; WEB3 WOMEN UNION FOUNDATION; WEB3ADS INC; WEI JHWSHDJ TRADING INC; WEICHAO TRADE INC; WEILLBINGCHAN LLC; WELLCANFLY INC; WELSFORD TRADING INC; WELTA SAFETY INC; WICKSON PHARMACEUTICALS INC; WIN MAXIMUM LTD; WINDMILL SOFTWARE DEV TECHNOLOGY LLC; WINTREND LIMITED; WIQWHE UHUBD TRADING INC; WISDOMFUSION INNOVATIONS LTD; WISPE INC.; WISUNO ELECTRONIC TECHNOLOGY LLC; WITHIIN. INC; WJD IJUKWSK TRADING INC; WONHAOO INC; WOOF MEOW HEALTH INC; WORLD FREE COMMUNICATION FOUNDATION; WORLD NONPROFIT ORGANIZATIONS REGISTRATION ASSOCIATION; WORLDBRAIN FOUNDATION; WQMOON TRADING CO., LTD.; WRAPOO INC; WUYAEG TRADING INC; XDD INC; XEX LTD.; XEX TECHNOLOGIES INC.; XHPLAIN SHOP INC; XIANFENG WEALTH LIMITED; XIANGLIN LTD; XINDE INC.; XINGCHEN INC; XINGGUANG INC; XINGMAI LTD; XINJIANG SILK ROAD AUTOMOBILE IMPORT AND EXPORT TRADE CO., LTD.; XINQI INC.; XINRAN TRADING CO., LTD; XINYI NETWORK TECHNOLOGY LTD; XTREAM LIMITED; XUNZHANG INC; XV TRADING INC.; XY FASHIONS INC; YALO NET TRADING INC; YANGU DEPARTMENT STORE SUPPLY CHAIN CO., LTD.; YANSHULA INC; YARD GLOBAL LTD.; YELLOWISBRIGEHZP INC; YICHEN INTERNATIONAL TRADING CO., LTD.; YICHEN TECHNOLOGY INC; YIJIADA TRADING INC; YIRUIDA TECHNOLOGY CO LIMITED; YISHENG HEALTH INC; YIWU SEN ZIRCONIUM TRADE CO., LTD.; YK GLOBAL SECURITIES LIMITED; YO DRINK CATERING LLC; YONGLIN INTERNATIONAL TRADING CO., LTD; YONJOY TECH LLC; YOUNGFUL GROUP INC.; YUANSHENG TECHNOLOGY INC; YUANTIAN TRADING CO., LTD.; YUBINB TRADE INC.;

<p>YUHE TRADE INC; YUNFANG LIMITED; YX TRADE INC; ZEBRA TECHNOLOGY INC.; ZEDSHOES INC.; ZENITH CONSULTING INC; ZENITH ELITE INC; ZERO ICE BATH LIMITED; ZHAOHUI TRADE LIMITED; ZHIQING TRADE INC; ZHONGCHUANG YUNZHI FOUNDATION; ZHONGDE INC; ZHONGJIN INT FINANCIAL SERVICES CENTER LTD; ZHONGLEZHIYE INC; ZHONGSHEN INNOVATION INVESTMENT INC.; ZHOUIJALE LLC; ZHOULIANCHANG LLC; ZHUZONGPING LLC; ZIA JUNAID TECH LLC; ZUDOGAUS LTD.; ZYVERIS E-COMMERCE LTD.</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, at Boxes 600, 890, or 1160, in Denver, Colorado (the “17th Street Addresses”).

4. The 17th Street Addresses are virtual mailboxes operated by the management company iPostal1, LLC (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 Addresses by Defendants. iPostal rented the 17th Street Addresses to a single individual for personal, as opposed to business, use. That individual had no authority to consent to Defendants utilizing the 17th Street Addresses 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 these unauthorized addresses 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 Addresses alleging investment 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 the appearance of 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 878² corporations and limited liability companies that list the 17th Street Addresses as the location of their registered agent and principal office address. A complete listing of Defendants is attached to this Complaint as Exhibit A.

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 There are 276 entities at Box 600, 407 entities at Box 890, and 195 entities at Box 1160.

16. Defendants also include multiple entities purporting to be colleges and universities, research institutes, and investment platforms, including: Colgate University Global (ID#: 20238291417), Colorado Engineering University (ID#:20221977246), The United States Federal Comus Institute of Ophthalmology (ID#: 20241657989), and AI Investment Education Foundation Ltd (ID#: 20241661856).

17. Some Defendants have also used names that are similar to well-known commercial brands or public institutions, including: Raymond James Financial Inc. (ID#: 20231910205), ConocoPhillips International Limited (ID#: 20241130588) and Estee Lauder Institute of Aesthetic Inc. (ID#: 20251567619).

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 Addresses, located in Denver County, as the addresses of both their registered agent and principal office.

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 locations at the 17th Street Addresses 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 Addresses, 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 Addresses.

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 virtual mailboxes located at the 17th Street Address as their registered agent addresses and principal places 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.

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.

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 Addresses in their business filings.

31. Each Defendant listed the 17th Street Addresses of virtual mailboxes as its registered agent address and principal place of business in documents filed with the Colorado Secretary of State. A complete listing of Defendants with their associated mailboxes is attached as Exhibit A.

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

34. The virtual mailboxes at issue in this case are 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

⁴ *Available at*

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

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 mailbox.

38. With respect to the 17th Street Addresses, 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 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 Addresses 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 Addresses, as required under federal postal regulations.

41. No Defendant was identified to the 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 Addresses were their registered agent and principal place of business addresses, when none of the entities had lawful authorization or consent to use those addresses 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 Addresses despite lacking any lawful right to operate from those locations.

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 in 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 70 MSBs are entities purportedly operating at Box 600, 58 MSBs are entities purportedly operating at Box 890, and 17 MSBs are entities purportedly operating at Box 1160, all at the 17th Street Addresses.

50. Thus, dozens 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 Addresses when they have no consent or right to use or occupy those addresses 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 Addresses.

52. Similarly, some Defendants appear to have submitted false information to the SEC. In October 2025, the SEC filed an indictment against an individual named Guanhua Su and his co-conspirators concerning the operation of deceptive investment firms, including Aetheris Diversified Inc (ID#: 20251178164).

53. In November 2025, the SEC filed a complaint against AI INVESTMENT EDUCATION FOUNDATION LTD (20241661856), a registered entity purportedly operating at 1312 17th Street Box 600. In its complaint, the SEC alleged that AI Investment, a purported investment adviser, made misrepresentations about AI Investment’s organization, office location, assets under management, and clients.

IV. Many Defendants appear to have engaged in fraud.

54. Entities located at 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.

55. With respect to the Defendants named in this specific Complaint, some examples include:⁵

- A. Century Global Gold Capital Ltd (ID#: 20238072256) – A consumer stated that they had been a victim of the company's purported investment product and lost \$55,000, stating, "I have lost all my life earnings in this" and that they were reaching out to the Attorney General's office "in desperation."
- B. Blockel Limited (ID#: 20251440793) – A consumer received a LinkedIn connection request from a stranger, who later asked to talk over Whatsapp. The stranger promoted the success of Blockel and, over time, convinced the consumer to invest with the website. The consumer paid thousands in purported authentication fees, premium membership fees, as well as other fees on top of the amount invested in the website. Eventually, Blockel refused to allow the consumer to withdraw any funds from their account. As a result of the scheme, the consumer liquidated all of their regular and Roth IRAs, 529 plans, and personal savings, and also took out personal loans.
- C. Blockel Limited (ID#: 20251440793) – Another consumer reported that an investment instructor on WhatsApp guided the consumer to invest money in Blockel. After transferring money to the website and seeing what appeared to be returns, the consumer was told that they needed to deposit \$100,000 as a guarantee to release the funds. The consumer never received their funds.

56. The majority of complaints received by the Attorney General involving Defendants' addresses concern cryptocurrency investment schemes, many of which

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 entity engaged in fraud in order to obtain the requested relief.

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

57. 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.

58. 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.

59. 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.

60. 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)

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

62. Defendants filed business registration documents with the Secretary of State’s Office using addresses they were not authorized to use. Specifically, Defendants identified virtual mailboxes at the 17th Street Addresses as their registered agent and principal place of business addresses without the consent of

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

the owner or occupant of those addresses.

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

64. 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

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

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

67. 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.

68. 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.

69. 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 Addresses as their registered agent and principal office addresses;
- 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; and
- H. Any additional relief the Court deems just and proper.

Respectfully submitted this 20th day of May, 2026.

PHILIP J. WEISER
Attorney General

/s/ Conor A. Kruger

LAUREN M. DICKEY, 45773*
First Assistant Attorney General
CONOR A. KRUGER, 54111*
SARAH C. BARRON, 62530*

Assistant Attorneys General
Consumer Fraud Unit
Consumer Protection Section
Conor.Kruger@coag.gov
*Counsel of Record

Attorneys for Plaintiff

Plaintiff's Address
Ralph L. Carr Judicial Center
Office of the Attorney General
1300 Broadway, 10th Floor
Denver, Colorado 80203