

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

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May 20, 2026 1:00 PM
FILING ID: EA95BE5FD3107
CASE NUMBER: 2026CV31839

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

Plaintiff,

v.

MACHLOGIC TECHNOLOGY CO. LTD;
MADEOWN INTERNATIONAL TESTING
CERTIFICATION INC; MAGGIGO
INTERNATIONAL INC.; MAGICMOMENTZ INC;
MAI DUO ELECTRONIC LIMITED; MALACHILE
INC; MANGAVERSE FOUNDATION; MANGO
TECHNOLOGY INC; MANGOERP LIMITED;
MANGOEX INFORMATION TECHNOLOGY CO.,
LTD; MANNING INTERNATIONAL DIGITAL
ASSETS (US) TRADING CENTER; MAOBRO LTD;
MAOMAO PARTNER INC; MARCUIS CRAIG
KELVIN LIMITED; MARHROAS PLASTICAL
POLYMERS CORPORATION LIMITED; MARINDA
INC; MARKSMAN TRO&COMPLAIN INC;
MARMRA INC; MARTAINN TRADING INC; MARY
UNION UNIVERSITY HOLDING GROUP LTD.;
MASEI & RYLAND ECOMMERCE USA INC;
MATEX INC.; MATOLUO INC.; MATRIX
EXCHANGE LIMITED; MATRIX EXCHANGE;
MAX LIMITS WORLD TECHNOLOGY INC; MAX
TECHNOLOGY LIMITED; MAXWAY CO.,
LIMITED; MD RESEARCH LTD; MEDUSA
FOUNDATION; MEET TECH US LTD.; MEIGOU
BANG LIMITED; MEIHANG TRADING INC.;
MEIJIA CHINA LIMITED; MEIYAN OVERSEAS
CROSS BORDER E-COMMERCE CO., LTD;
MELINETY INC; MELLON INTERNATIONAL
GROUP LLC; MENBO TRADING INC; META
COMMUTER CO.,LTD; META DAO
FOUNDATION; METAINIT TECHNOLOGY INC;
METAPOCKET FOUNDATION; MFSYBERK INC;

▲ COURT USE ONLY ▲

MI SING CULTURE MEDIA CO., LTD;
MICONYCO INC; MICRO VAPORS INC.;
MICRODATA TECHNOLOGY LIMITED; MIER
(USA) SPORTS CO., LTD.; MIGNON TRADING
USA CORPORATION; MIKO INC; MILANOO
GLOBAL US LIMITED; MILLER MACHINERY
(AMERICA) LIMITED; MILLETSOFT LTD;
MILLIONSHARE. INC; MINCHO TRADING CO.,
LTD; MINGSHENG; MINGYOU INC; MINOS. INC;
MINTYAIR ECOMMERCE INC; MISOLER TRADE
INC.; MISSION INTERNATIONAL INC.; MIUBUY
INC; MIX FINTECH PTE. LTD.; MIXING MEDIA
CO., LTD.; MK GOLD LIMITED; MME MIA
INTERNATIONAL TRADE INC; MOBILIKE
TECHNOLOGY US LIMITED; MODEN
EXCHANGE GLOBAL LIMITED; MOERDENG
INC.; MOFA INC; MOFUE TRADE INC;
MONOPOLY MILLIONAIRE FOUNDATION;
MOONSUM,INC; MORCART GROUP LIMITED;
MORCYFOOL AUTOMOBILE MAINTENANCE
SERVICE (USA) LTD; MORSE DIGITAL TRADING
PLATFORM CO., LTD.; MOSS DIRECT INC;
MOUHEI INC.; MOUNTAIN PRAIRIE INC.;
MOUSE TRADING CO., LTD; MSHU TRADING
LIMITED; MSY GLOBAL BUSINESS SCHOOL
INC; MTALL FINANCE CO., LTD; MTK FX
FINANCIAL LIMITED; MUNIYA TRADING INC;
MUSKOLA INC; MUZANE TRADE INC.; MXCUS
INC; MYH INTERNATIONAL BUSINESS SCHOOL
INC; MYSTIC MODE INC.; MYSTICPAVILION
INTERACTIVE LTD; NADDAKRA TRADING CO.,
LTD; NAISMITH CO., LTD.; NANNIES TRADE
INC; NANROBOT INFORMATION TECHNOLOGY
INC; NASDAQ SECURITIES FINANCIAL GROUP
INC; NAST TRADING CO., LTD; NATSEFF USA
INC.; NATURAL SPORTS FITNESS AND
FUNCTIONAL TRAINING ASSOCIATION;
NATURE & HEALTH CO., LTD.; NATURE WISH
LIMITED; NATURELAND INC.; NB
FOUNDATION; NEDIYA LIMITED;
NEONFACTORY LIMITED; NETCO LTD;
NETHERLANDS WINDGRO AGRICULTURAL

SCIENCE CO., LTD.; NETSOLVE NETWORK TECHNOLOGY LIMITED; NEW BEE LIMITED; NEW EPOCH LIMITED; NEW GENERATION TECHNOLOGY CO., LTD.; NEW HORIZON TRADING INC.; NEW HUMAN GENOMICS AND HEALTH LLC; NEW SUNSHINE CO., LTD; NEW VISION TATTOO SUPPLIES LIMITED; NEW VISION TRADING LLC; NEW YORK DYNASTY X EXCHANGE LIMITED; NEWBORN EQUIPMENT MANUFACTURING COMPANY; NEWBOT USA INC; NEXOSPHERE INC; NEXTG LIMITED; NEXUSDEV TECHNOLOGIES INC.; NHCRYSTAL LTD; NIASAI INC; NICO LSEENER INC.; NIKE INTERNATIONAL LIMITED; NO.7 EXCHANGE; NOBEKA TRADE INC; NOOBOOSI INC.; NORDSTERN KAPITALMANAGEMENT GMBH LTD; NORTH RAY INC; NORTHFACE UNIVERSITY; NORTHVILLAGES TECHNOLOGY CO., LTD.; NOUBITE INC; NOVATION TECHNOLOGY INC.; NOVORIK TECHNOLOGIES INC.; NOWLTY INC.; NSN APPAREL CO., LLC; NUTECH GROUP LTD; NUTRAHEALTHX INC.; O&K FURNITURE COMPANY INC; OAC INTERNATIONAL FOUNDATION; OBER INTERNATIONAL TRADE INC.; OCEAN CABINETS LTD; OCEANBRIDGE INC.; OCTER INTERNATIONAL TRADE INC.; OKEX WEALTH LTD; OKRADI COMMUNICATIONS LIMITED; OMEGATF US; OMNICLOUD INTERNATIONAL FOUNDATION; ONE BY ONE LIMITED; ONE STAR SOLUTION LTD; ONE TO INFINITY INC.; ONETOO LIMITED; ONVISION INC; OP PAINT CHEMICAL (CHINA) CO., LTD.; OPTIMALLIFE INC.; OPTION-O INC; OPULENT ORNAMENTS INC; ORACLE GROUP INC; ORALJOY TRADING CO., LTD.; ORAMENT LIFE LLC; ORANGEVINE INC; ORGANIZER KING INC; ORIENTAL CULTURE PUBLISHING HOUSE; ORIENTAL STAR FLARE INC; OTT FILTRATION TECHNOLOGY INC; OVERNEL FABIO INCORPORATED; OVERSEAS STARSHINE INC; PADONY TRADE INC; PANANA TRADING USA

INC; PANGU GROUP INC; PARALLEL UNIVERSES LIMITED; PAWPLEASURE INC; PEACH; PEAK BLUE TECHNOLOGY INC.; PENTA CAPOT TRADING INC.; PERCIVAL TRADE INC; PERFSO NC TRADE LIMITED; PETERS POLO CO., LTD; PETPALACE INC; PETPERK INC; PHEMEX LTD; PHILEMON LAB INC.; PHILO INFORMATION TECHNOLOGY CO., LTD.; PHOENISATION TRADING CORPORATION; PHOENIX CONTROL INTERNATIONAL INC.; PHOENIX MOERT INC.; PHU QUOC MINE GROUP LTD; PHYSICAL ACOUSTICS CORPORATION; PHYXTRADE LTD.; PIKAPIKA TRADE LIMITED; PILLOWBEAR INC; PINGKDBIF INC; PIONEER WIRE INC.; PIONFUTUREPLAN LTD; PIP SCIENCE TECHNOLOGY LTD; PISMOCK INC; PLATO FOUNDATION; PLOUSTITIE TELECOM TECHNOLOGIES INC; POLARIS INTERNATIONAL TRADE INC; POSEIDON WORLDWIDE COMPANY LIMITED; POTALA ENTERPRISES INC.; POTENTIAL INC; POWERON TECH LIMITED; PROILPET INC; PROSCENIC TECHNOLOGY INC.; PROSPERITY TRADING CO., LTD; PRRO INC.; PRUDENTIAL FOUNDATION (USA) LTD; PURPLE MICRO CIVILIZATION INTERNATIONAL COOPERATION ORGANIZATION; PUTPIX INC.; PYHONG TRADING CO., LTD; QEX FOUNDATION; QIANBI DIGITAL TRADING PLATFORM CO., LTD.; QIANLI TECHNOLOGY CORP; QILONG LIMITED; QI'S HOLDING GROUP; QJH USA. INC; QP.CONOLID GEOLOGICAL HAZARD CONTROL INC.; QUEEN INTERNATIONAL LTD; QUEEN'S PROFESSIONAL UNIVERSITY OF BRIGHTON INC.; R&H HERITAGE AUCTIONS INC.; R8 FOUNDATION; RAHMAN INC.; RAINBOW BLOCKCHAIN INFORMATION CO., LTD; RAINBOW LIFE LLC; RAMET INC; RANAVAT LABORATORY; RANDAN INC; RAPHAEL TECHNOLOGY CO., LTD; RATELENDI

TECHNOLOGY (USA) HOLDING GROUP INC.;
RAYLAN TRADING CO., LTD; RAYS LTD.; READY
HAPPY INC.; REAL COLLECTION INC.; REALM
GROUP INCORPORATED LIMITED; RED PLUME
CLOTHING INC; REGAL CORE MARKETS
LIMITED; REITER TRADING CO., LTD;
RELIFEEL INC.; RESEARCH NETWORK
TECHNOLOGY LTD; REVERIE MARKETS LTD.;
REVERSAL NETWORK TECHNOLOGY CO., LTD.;
REVIVPRO HOLDINGS INC; RGVV INC; RHEA E-
COMMERCE INC; RICECAT INC; RICH
FLOWERS TRADING LTD; RICH INNOVATIONS
INC.; RICHMAN GROUP INC; RICHSUPPLY INC;
RIDDER TRADER PTY LTD; RILON TRADE INC.;
RIMTECH INC; ROACH LIMITED; ROALENEX
INC.; ROCKEFELLER INTERNATIONAL HIGH
SCHOOL; ROCKEFELLER TRADING INC;
ROMEX INTERNATIONAL LTD.; RONALD
DESIGN I&O CO., LTD.; RONGBERSY INC;
RONGHUI ELECTRONICS INC; RONGSHENG
INC.; ROSE HALCYON LTD.; ROSEMARY
DEVICE CO., LTD; ROSS HOME FASHION INC;
ROTHSCHILD DIGITAL BANK LIMITED;
ROTHSCHILD DIGITAL FOUNDATION; ROTORO
LTD; ROUND RABBIT TECHNOLOGY CO., LTD.;
ROVGE LIMITED; ROYAL PALM POLO SPORTS
CLUB; RRMB INC.; RUFLYING EBIKE LTD.;
RUITO INC; RUNCAI LIMITED; RUNTOO TRADE
INC.; SAFE&SAFETY INC; SANABRIA CN INC;
SANTA FE HOME INC.; SATURDAY TRADING
CO., LTD; SAYNICE INC; SEAGOD
FOUNDATION; SEAHORSE TRADING INC;
SEALY(USA) GROUP SMART HOME CO., LTD;
SEAMEW BIOMEDICAL TECHNOLOGY
LIMITED; SEBSTTI INTERNATIONAL SERVICES
LIMITED; SEEKER & EXPLORER TEXTILES
INTERNATIONAL TRADE LTD; SELISERIL INC;
SENIUMAWAY LTD; SERENADA TRADING INC;
SERTA (USA) GROUP SMART HOME CO., LTD;
SESTO ELEMENTO INC; SEVEN THOUSAND
MILES TRADING CO., LTD.; SEVEN TREE INC;
SGO INVESTMENT CO., LTD.; SHANGPO

INTERNATIONAL TRADING LIMITED; SHENGYI GROUP LIMITED; SHIELD FILM. INC; SHINY JUNE TECHNOLOGY INC.; SHUSHILAI OPTICAL CO., LTD.; SIHOO FURNITURE INDUSTRY LTD; SILK BOX INC.; SILKY CHAMBER CO., LTD.; SIMMONS (USA) GROUP SLEEP TECHNOLOGY CO., LTD.; SIMMONS INTERNATIONAL GROUP OVERALL HOME CO., LTD; SIMON LIMITED; SIMON TRADE CO., LIMITED; SINCERITY SMART TECHNOLOGY INC.; SINCLAIR AMERICA INC; SINGAPORE LORDFINN EXCHANGE; SINO TRADING INC; SINRENBER INC.; SISTRECLAER INC; SKFD TECHNOLOGY LIMITED; SKIN LOVERS LTD; SKYRHYME LNC; SLK-HOBBY CO., LTD; SMILE DENTAL GROUP INCORPORATED; SO POPULAR TECHNOLOGY LIMITED; SOAP CHEMICAL CO., LTD.; SOFT STONE INC.; SOFTBANK GROUP CORP; SOHAO INC; SOHUP INC; SOJOY CO.,LTD; SOLAR MATE INC; SONLUK ENERGY USA INC; SOUL TATTOO TIDE CO., LTD.; SOUTHERN LIGHTS LTD; SPARK VEGE INC; SPERTA (USA) ENVIRONMENTAL TECHNOLOGY INC; SPORTLINK TRADE LIMITED; SPR INC; SPRING BREEZE TRADING COMPANY; SQUARE SPACE LTD; STANAWAY ELECTRONICS TECHNOLOGY INC; STANFORD ANALYTICAL CHEMICALS INC; STAR CENTER TRADING CORPORATION; STAR MOON INTERNATIONAL INC.; STAR TRADING COMPANY; STARENJOY CLUB INC; STARGAZE INC.; STARK INDUSTRIES CO.,INC; STARLIGHT TECHNOLOGY US LIMITED; STARPLUS INC; STARRYSKY; STARRYTREE LIMITED; STARWIN TRADING; STERLING SUPPLY INC.; STEYR INC; STORMEYES FOUNDATION; STOX PIPS LIMITED; STRARY INTERNATIONAL TRADING CO., LTD; STREE TRADING CO., LTD; STROSS TRADING INC.; SUMMER STYLE I&O LIMITED; SUMMIT ENTERTAINMENT MEDIA CO., LTD; SUN HANG HANG LLC; SUN VALLEY TRADE CO., LTD; SUNBLUE INC; SUNCH BATHROOM LLC; SUNDAY SUPPLY CHAIN CO., LTD.;

SUNFAR LTD; SUNJOO INTERNATIONAL INC;
SUNLIGHT INTERNATIONAL TRADE CO., LTD;
SUNLIGHT TRADING INC; SUNRISE
INTERNATIONAL INC.; SUNRISE LTD;
SUNRISE PAX INC; SUNSHINE CULTURE
INTERNATIONAL LIMITED; SUNSHINE TRADE
CO., LTD.; SUNTON LTD; SUNWAY INT'L
TRADING COMPANY; SUOKENI INC; SUPER
DREAM CO., LTD; SUPER POWER USA INC.;
SUPERWAVE SPORTS LLC; SUPREME BOX INC;
SUPREME FACTORY LTD; SUREN INNOVATION
INC; SVEIN TRADE INC.; SWIFTREACH INC.;
SWIFTSHOPPING EXPERIENCE
INCORPORATION INC; SWISSTRADE FINANCE
INTERNATIONAL LTD; SWIX INC; SWTT
FOUNDATION LTD; SYDER TECH CO., LTD;
SYMBIOSIS INC.; SYNVAL USA BIO-TECH CO.,
LTD.; T&S INDUSTRIAL INC; TABLECASE INC;
TAILWAGGIN INC; TAIYI TRADE INC.;
TALLSTAR TECHNOLOGY INC; TANG JIUFEN
CLOTHING LIMITED; TANGMSKY INC; TAODE
TRADE LIMITED; TAOXINGZHI COLLEGE;
TASCO TRADE INC; TAURAS TECHNOLOGIES
LTD; TAYLOR SUBLIMATION LTD; TB TRADING
INC; TBEST TRADING INC; TBRPI PIPELINE
CO., LTD.; TD-ALADDIN INC.; TECH LTD;
TECOCATO IMPORT & EXPORT TRADE CO.,
LTD; TEENYUEN TRADING INC; TEKTRONIX
PLANT LIFE SCIENCE RESEARCH INSTITUTE
INC; TELAS AUTO MAINTENANCE
TECHNOLOGY CO., LTD; TEN FORTY SOLAR
LIMITED; TENGFEI TECHNOLOGY CO., LTD;
TENJOY TRADE LTD; TESSLUX BRANDS INC;
THE BEAUTY OF A FALLEN CITY INC; THE
BLUE SKY CO., LTD; THE BOARDING SCHOOL
ASSOCIATION OF AMERICA; THE DUPONT
CHEMICAL INC; THE H.D.LEE COMPANY, INC.;
THE INTERNATIONAL BOARDING SCHOOL
ASSOCIATION; THE PTEL SERIES OF CTVE
ASSOCIATION; THE UNESCO NEW YORK
ASSOCIATION; THE UNIVERSAL GROUP; THE
WORLD CHARITY FEDERATION FOR

DISTINGUISHED FIGURES; THEODORE EXCHANGE; THINHI TRADING CO., LTD; THREE TIGER INC; THUNDERBLUFF INC; TIAN CHINESES INTERNATIONAL LIMITED; TIAN HONG INC; TIELI TRADING INC; TIGER FOUNDATION; TIKARM LLC; TIL INTERNATIONAL FOUNDATION; TIMAX HOLDINGS CO.,LTD; TIME EXCHANGE OF AMERICA LTD.; TIMES INC; TIMETRADERS LTD; TIMING INC; TIMTUC INC; TINKTINKBUZZ INC.; TINOR INC; TIPTOP TEXTILE INC; TIRAPID GROUP INC; TITAN BLOCKCHAIN CO., LTD; TJDEONST. LTD; TMEX INC.; TNMALLS LTD; TOAUTO TOOLS INC; TOFFS LIMITED; TOMASH LTD.; TOMMY AXXA INC; TOMMY TRADE LIMITED; TONGDA TRADING CO., LTD.; TONGRUI CO., LIMITED; TONGTU TRADE INC; TOOLAND LTD; TOP CROWN CULTURE AND ENTERTAINMENT CO., LTD.; TOP TANK INC.; TOPSELLER CO., LTD; TOPSTARLINK INC; TOPTECH LTD; TOPWAY INC.; TOPWAY TRADE INC; TORCH TECH.INC; TOTEM INTERNATIONAL TRADING LTD; TPEX INC.; TRANSHARE LTD.; TREESYMBOL LIMITED; TREND LIGHTING LTD.; TRENWAY INC.; TREX TRADE GLOBAL INTERNATIONAL LIMITED; TRIPLETAP GEAR CO., LTD; TRUMT TRADING CO., LTD; TRUST CAPITAL LIMITED; TRUST PARTNERSHIP INC; TUBNVOOT LTD.; TYD USA INC; TYLON TRADE INC; U&M INTERNATIONAL INC.; U.S. DIGITAL ASSET BANK NO.3; U.S. NENGXIN INC.; U.S.A SIGEMU COMPANY LTD; U.S.A TIME INDUSTRIAL CO., LIMITED; U.S.A WORLD BRAND CERTIFICATION CENTER; U9 TRADE LTD; UBUTMEX; UILAME BEAUTY MANAGEMENT, LLC; ULEI COIN INC; ULIKEPARTY INC; ULTIMATE TECHNOLOGY SYSTEM LIMITED; ULTRAQ TECH INC.; UMICA TELECOM INC; UN WORLD SAFETY EMERGENCY MATERIAL RESERVE COMMITTEE; UNCC INTERNATIONAL FOUNDATION; UNIALL FOUNDATION LTD;

UNIMUT INC.; UNION DIGITAL FOUNDATION;
UNION HYGIENE PRODUCT INC.;
UNIQUEUMBRELLA INC; UNITED
COMMERCIAL BANK LTD; UNITED HANKGO
WATER SYSTEMS CO.,LTD; UNITED NATIONS
HUMANITARIAN AID AGENCY; UNITED
NATIONS JUNIOR MAYOR UNIVERSITY;
UNITED NATIONS MRS. AND MISS WORLD
PEACE COMPETITION ASSOCIATION; UNITED
STASTES INC.; UNITED STATES CORDYS
VALVE GROUP CO.,LTD; UNITED STATES JADIA
LTD; UNITED STATES OF AMERICA SALMA
RESEARCH CENTER; UNITOP TECH PTY LTD;
UNIVERSAL MUSIC GLASS LTD.; UNIVERSITY
OF EUROPE-ASIA INC; UNIVERSITY OF
SYMBIOSIS; UNO INTERNATIONAL CO., LTD;
URY BIOTECHNOLOGY GROUP; US AIALL INC.;
US ARMEST BIOENGINEERING COMPANY; US
COLORADO VALVE GROUP LTD; US CORE
ELECTRONICS CO.,LTD; US DOW CHEMICAL
INC; US DUPONT CHEMICAL INC; US
HAPBUSNISS LTD; US INTERNET LOT
FOUNDATION; US JING YING HEALTH
TECHNOLONGY COMPANY LIMITED; US MOEN
ELECTRIC LTD; US SHUDA HOME INC.; US
SIMMONS GROUP (BLACK GOLD) CO.LTD; US
ULTRON SCIENCE OF ANGRICULTURE CO.,
LTD; USA COLORADO SPOT MEDICAL
CENTER; USA ACE INTERNATINOAL GROUP
TECHNOLOGY LIMITED; USA ACEWARD
INTELLIGENT TECHNOLOGY CO., LTD; USA
ADDITIVE FREE SKIN CARE RESEARCH
CENTER; USA AIBU TECHNOLOGY CO.,
LIMITED; USA AILUSHENG BIOTECHNOLOGY
LIMITED; USA ALFA AGRO CHEMICAL
COMPANY; USA AMAZON INFORMATION
RESERACH LTD; USA AOMESIT GROUP
TECHNOLOGY LIMITED; USA AOWEIER LTD;
USA ASHVIVI CO., LTD; USA ASLINON
CHEMICAL GROUP CO.,LTD; USA BAIWEI
CRAFT BEER LTD; USA BBG KEUYMASTER
GROUP TECHNOLOGY LIMITED; USA

BEILUNNUO BIOLOGICAL ENGINEERING LTD.; USA BORAY AUTOMATIC CONTROL VALVE CO., LTD.; USA BOYIER BIOTECHNOLOGY CO., LIMITED; USA BRAMEY LIMITED; USA BULL CHEMICAL GROUP CO., LTD.; USA CARTER VALVE INC.; USA CILIOB BIOLOGY GROUP LTD; USA COLGA COMMERCIAL SERVICE CO., LTD.; USA COLORA BEER GROUP LIMITED; USA COLORADO DMANS.D TECHNOLOGY CO., LTD.; USA COLOURPOP BIOTECHNOLOGY INC; USA CORNE.D AGRONOMY COMPANY; USA CRTONS WATER SYSTEMS LIMITED; USA CTISO INDUSTRIAL DEVELOPMENT LIMITED; USA DANVERS INTERNATIONAL CROP PROTECTION CO., LTD; USA DEVENO COATING GROUP LIMITED; USA DIBO MASTER GROUP TECHNOLOGY LIMITED; USA DOW CHEMICAL HOLDINGS CO., LTD; USA DUHARMEN CO., LTD; USA DUOLUCHI LUBRICATION TECHNOLOGY LIMITED; USA DUPONT AUTOMOTIVE INSULATION FILM TECHNOLOGY CO., LTD; USA DUPONT CHEMICAL GROUP CORPORATION; USA DUPONT GROUP INTERNATIONAL CO., LTD; USA EFFENDORME BIO INC; USA ELECTROLUX ENVIRONMENTAL PROTECTION EQUIPMENT CO., LTD; USA EMBERGER BIOLOGICAL CO., LTD.; USA ENZO CO., LTD; USA ESTEY PIANO CO., LTD; USA FAMIRUI PET PRODUCTS LTD; USA FEDERAL INTERNATIONAL ART CERTIFICATION ASSOCIATION; USA FILTER INTERNATIONAL LIMITED; USA FIRASNY INTELLIGENT BATHROOM TECHNOLOGY CO., LTD; USA FIRE ENTERPRISE GROUP CO., LTD; USA FLORAIXUS BIOLOGY GROUP LIMITED; USA FLYPOSE LIMITED; USA FREYCE CHEMICAL COMPANY LTD; USA GDEB LTD; USA GENETIC ENGINEERING ANTI-AGING RESEARCH CENTER; USA GINSFIELD AGRICULTURAL IMPORT AND EXPORT CO., LTD; USA GM WULING POWER GROUP CO., LTD; USA GOLDEN KERR SLEEP LTD; USA

GREEN SOURCE INTERNATIONAL LIMITED;
USA GUCGRES TECHNOLOGY CO., LTD; USA
HAPPY WAY PETROCHEMICAL CO., LTD; USA
HAZELTON PIANO INC; USA HIMISFEI INC;
USA HOMELITE PETROCHEMICAL CO., LTD;
USA HULONGWEI INTERNATIONAL SECURITY
LIMITED; USA INTERNATIONAL COVENANT
INC.; USA J&C NUTRITION LLC; USA JIAJI
PLANT NUTRITION RESEARCH CENTER LTD;
USA JIALUBAO ART COATING GROUP
TECHNOLOGY LIMITED; USA JIAMINODE
CHEMICAL INDUSTRY COMPANY; USA JINMEI
HOLDING GROUP CO., LTD; USA LEOPOLD
INC.; USA LEVIN TUBE INT'L GROUP LTD.; USA
LUENSHA GROUP INC; USA LVDABAO ANIMAL
NUTRITION CO., LTD; USA MEDRON
INTERNATIONAL CROPS LTD; USA MELUDA
GROUP LIMITED; USA MENGSHANI ART
COATING GROUP TECHNOLOGY LIMITED; USA
MISKIN TECHNOLOGY LTD; USA MONSANTO
ERLE AGRICULTURE GROUP LTD; USA
MORGAN BIOTECH CO., LTD; USA MUSA ART
PAINTING GROUP TECHNOLOGY LIMITED;
USA MUSILAER ART COATING GROUP
LIMITED; USA NATURE INTERNATIONAL
TRADE INC; USA NEWTRULY CHEMICAL
GROUP, INC.; USA NIBER VALVE GROUP INC.;
USA NUOSHA ART COATING GROUP LIMITED;
USA ONECOIN INVESTMENT FINANCE CO.,
LIMITED; USA OUTSTANDING LIMITED; USA
OUVROD INTERNATIONAL INC; USA PANGMA
GARDENING CO., LTD; USA PECKER NEW
MATERIALS CO., LTD; USA PLAY FASHION
LIMITED; USA POLY TENG INTERNATIONAL
CO., LTD; USA PRECISE FLUID POWER INC;
USA QINGYI REAL ESTATE COMPANY; USA
RGDY INTERNATIONAL GROUP INC.; USA
RUILAI CHEMICAL GROUP LIMITED; USA
RUNRAY LLC; USA RUSM (CHINA) CHEMICAL
GROUP CO., LTD.; USA SAYRGENE COMPANY;
USA SEALS VALVE GROUP INC; USA SECOMAY
PLANT NUTRITION CO., LTD; USA SERTA

FURNLTURE GROUP COMPANY LTD; USA
SERTA GROUP TOP SLEEP CO., LTD; USA
SERTA LTD; USA SHENKER SHTORK
EQUIPMENT CO., LTD; USA SHIXI
INTERNATIONAL GROUP CO., LTD; USA SHUDA
BEDDING GROUP CO., LTD; USA SHUNLIAN
COUNTRY TRADING INC; USA SIMMONS
GROUP LUX DREAM TECHNOLOGY SLEEP INC;
USA SIMMONS GROUP TOP SLEEP
TECHNOLOGY INC; USA SIMMONS HOME
GROUP CO., LTD; USA SIMMONS TECHNOLOGY
HOME GROUP CO., LTD; USA SMEN CHEMICAL
CO., LTD; USA SMITH ELECTRIC TECHNOLOGY
CO., LTD; USA SMITH KITCHEN ELECTRICITY
LTD.; USA SMITH NEW
ENERGY(HOLDINGS)CO., LIMITED; USA
SOTURE LABS LLC; USA STUAO CHEMICAL
BIOLOGY CO. , LTD.; USA SUFEI SYNTHETIC
LUBRICATING OIL LIMITED; USA UNICME
INSWORLD INVESTMENT BANK LTD; USA
VICARD AGRI-CHEMICAL GROUP CO. , LTD.;
USA WANSHENG MACHINERY EQUIPMENT
CO., LTD; USA WENGERMU CHEMICAL
INDUSTRY GROUP LIMITED; USA WESTERN
ENERGY DEVELOPMENT CO., LTD.; USA
WILARMON CO., LTD; USA WINSTON
BIOCHEMICAL GROUP INC; USA XIN BAI LUN
LIMITED; USA XITU ENERGY SOURCE GROUP
LIMITED; USA XIYANGSEN IMPORT AND
EXPORT CO., LIMITED; USA YARNAS
INTERNATIONAL MARINE BIOTECHNOLOGY
CO., LTD; USA YOLAUN INDUSTRIAL GROUP
INC; USA YOO ZENG TECHNOLOGY INC; USA
YOUCHUANG KITCHENWARE INC; USA ZUKESI
INTERNATIONAL LTD.; USA ZUNSHANG STYLE
BEER BREWING CO., LTD; US-CHINA
INSTITUTE OF RELIGION; USHER INC;
USNOAH INC; USONIC INC; VANBOW
INTERNATIONAL INC; VANGUARD
INVESTMENT GROUP LTD; VCLIGHT CO., LTD.;
VDOT FOUNDATION; VELONTECH INC.; VEOKE
INC; VEOTIE LTD.; VERISK ANALYTICS (US)

FUND MANAGEMENT COMPANY; V-GAIN (USA) LIMITED.; VICTORIA MALL LTD; VIOFO INC.; VIRAT NETWORK TECHNOLOGY CO., LTD; VISTA TECHNOLOGY CO., LTD; VITALISMO USA INC; VITALVEDA INC; VITES FOUNDATION; VIVAFOLIN NUTRITION & HEALTH US LIMITED; VIVCMIN GROBAL INC.; VIZION INTERNATIONAL LTD; VONGLO LIMITED; VOOVIP INC; VOSSLULER LIMITED; VOVBOWS INC.; VOYAGE GLOBAL TRADING INC.; VTUVIA ELECTRIC BIKE INC; VVSMRITI INTERNATIONAL TRADING CO., LTD; VWEBCOIN LIMITED; WAGNER BIOTECHNOLOGIES INC.; WALK LAB LIMITED; WANTAI APPAREL TRADING LIMITED; WASAM INC; WASTE WALTZ (USA) INC.; WATERS LIMITED; WDH FOUNDATION; WEALTH KEY GROUP INC; WELDMART INC.; WELLSONG ENTERPRISES INC; WENLIANG TRADING CO., LTD; WENSENTE INC; WEREWOLF TRO&COMPLAIN INC; WESTROAD TRADING CORPORATION; WEWARM SMART HOME INC; WEYMICS INTERNATIONAL INC; WHELMING TECH INC; WHIMSYWAYS INC; WHISPHERE RETAIL (US) CO., LTD; WICKED STYLE INC; WIGERLON TECHNOLOGY INC; WILOMIS INC; WILSON TECH SERVICE LLC; WINDS BRO GROUP INC; WIPPI INC; WISDOM GROUP LTD; WITTON TRADE LIMITED; WONDERSCOPE TECHNOLOGIES INC; WOODHULL LLC; WOODROOM CORP.; WOODSTUDIOS; WORLD ASTRONOMY ORGANIZATION; WORLD CHINESE CUISINE INDUSTRY HEALTHY GOURMET ASSOCIATION; WORLD CITIZEN PRACTICAL UNIVERSITY SHARE LIMITED; WORLD ECOLOGY ORGANIZATION; WORLD FRONTIER SCIENCE AND TECHNOLOGY CONFERENCE; WORLD GENE ORGANIZATION; WORLD HONGMEN ASSOCIATION; WORLD HONGMEN BANK LIMITED; WORLD HONGMEN GROUP LIMITED; WORLD IMPORT & EXPORT TRADING CO.,LTD; WORLD INTELLECTUAL

PROPERTY EXCHANGE; WORLD METEORITE
INDUSTRY FEDERATION; WORLD PLANT
NUTRITION INSTITUTE; WORLD REMITTANCE
MANAGEMENT FUND LIMITED; WORLD ROCK
PAPER SCISSORS SOCIETY; WORLD
TAEKWONDO ASSOCIATION; WORLD TAOIST
ORGANIZATION; WORLD UNIFIED DIGITAL
CURRENCY GROUP LIMITED; WORLDLEAP
GROUP INC; WRCIBO TECHNOLOGY CO., LTD;
WTOKEN TECHNOLOGY LIMITED; WUTRA
INC.; WWINJOY INC; WZMENGQ LTD.; WZY
ENTERPRISE INC.; X BUSINESS SOLUTION INC;
XAUTOSTEREO LIMITED; XCOL TECHNOLOGY
INC.; XIANEN TRADE INC; XIAOMAN INC.;
XIMENCSI (USA) GROUP LIMITED; XINCLIANF
INC; XINGHONG INC.; XINGZHI INTELLIGENT
TECHNOLOGY USA INC.; XINING TRADING INC;
XINJY INC.; XINPORT INC; XUESHIDY INC; XUN
DUODUO (USA) INC.; XXLIBRARY LTD; YAMMA
LTD; YANGYANG INC.; YASING INC; YCK
ADVISORY LTD; YDW DIRECT INC; YEGIRL INC;
YES GLOBAL INC; YESCO INC.; YESCOM STAR
INC; YESURE INC; YG6 TECHNOLOGY LIMITED;
YIGO FORWAR INC.; YIGUOGUO TECHNOLOGY
CO., LTD; YIMUMU TRADING CO., LTD;
YINGBANG TECHNOLOGY INTERNATIONAL
INC.; YIQIXING TECHNOLOGY CO., LTD.;
YIRANXIN INC; YITU TRADE INC; YJ TRADE
LIMITED; YNIQUE INC; YOGADEPT INC.;
YOMIGT INC.; YONOTA TRADE INC; YOOSOOCH
CORP; YOUGUO OVERSEAS E-COMMERCE
LIMITED; YOUNGHOO CO.LTD; YOUNGTOP
CAPITAL RESEARCH LLC; YOURAN LIMITED;
YOZZI PERSONAL CARE (USA) INC.; YUAN AI
NOVA TRADING INC; YUANDONG CAPITAL
INVESTMENT HOLDING GROUP CO., LTD; YUN
SHU INTERNATIONAL TRADE LIMITED;
YUNCHANG INC; YUNGE CO., LTD;
YUNSERVER LLC; YURUI TECHNOLOGY
LIMITED; YUUTA INTERNATIONAL INC; YYS
TURKEY-SAUDI INTL LOGISTICS LTD; ZA0 LLC;
ZACKSTRAD ADVISORY LLC; ZALUCY INC;

<p>ZANCHEN INTERNATIONAL PLANT NUTRITION USA INC; ZANE R TRADING INC.; ZAVIER JOINT STOCK LIMITED COMPANY; ZENITH FINTECH GROUP; ZERMART LTD; ZEROUN. INC; ZEWU MOTOR INC; ZFFTEAMO TRADING INC; ZHEFEI E-COMMERCE CO., LTD; ZHEJIANG HUANLONG NEWMATERIAL SCIENCE&TECHNOLOGY CO., LTD; ZHENLI INTERNATIONAL CO., LTD.; ZHIHU VEHICLE MANUFACTURING CO., LTD; ZHONG SHENG AVIATIONSERVICES CO., LIMITED; ZHONGDAO MATERIA MEDICA INSTITUTE; ZHONGLING INTERNATIONAL BUSINESS SCHOOL; ZHONGTENG ACCOUNTING CO., LTD; ZHONGYI STONE LIMITED; ZI YU NOVA TRADING INC; ZIMENG INTERNATIONAL CO., LTD; ZIWEI CIVILIZATION INTERNATIONAL PUBLIC- BENEFIT CHARITY FOUNDATION; Z-L ELECTRONICS INC; ZONE PIN LIMITED; ZOORDO INC; ZOSEAXI TRADING CO., LTD; ZUNTU TRAVEL INC.; ZX TRADING INC; ZYEX FOUNDATION; ZYEX</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 692, Denver, Colorado (the “17th Street Address”).

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

5. iPostal did not consent to the use of the 17th Street Address by Defendants. iPostal rented the 17th Street Address to a single individual for personal, as opposed to business, use. That individual had no authority to consent to Defendants utilizing the 17th Street Address in filings with the Secretary of State.

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

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

8. By listing this unauthorized address in their business filings, Defendants introduced false information into Colorado’s corporate filing system. Those false filings created the appearance of legitimacy for entities that often could

not be verified, contacted, or have their registered agent properly served at the address they claimed to occupy.

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

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

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

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

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

PARTIES

14. Philip J. Weiser is the duly elected Attorney General of the State of Colorado and is authorized under C.R.S. § 6-1-103 to enforce the provisions of the CCPA. The Attorney General is also authorized under C.R.S. §§ 7-114-301 and 7-80-810 to judicially dissolve entities that obtained their articles of organization (for LLCs) or incorporation (for corporations) through fraud or that have exceeded the authority conferred upon them by law.

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.

15. Defendants are 835 corporations and limited liability companies that list the 17th Street Address as the location of their registered agent and principal office address. A complete listing of Defendants is attached to this Complaint as Exhibit A.²

16. Defendants also include multiple entities purporting to be colleges and universities, research institutes, and investment platforms, including NORTHFACE UNIVERSITY (ID#: 20181701641), World Plant Nutrition Institute (ID#: 20151027212), and Rockefeller Trading INC (ID# 20251588761).

17. Some Defendants have also used names that are similar to well-known commercial brands or public institutions, including US DOW CHEMICAL INC (ID#: 20231279527), US DUPONT CHEMICAL INC (ID#: 20231387627), NIKE INTERNATIONAL LIMITED (ID#: 20211208592), SoftBank Group Corp (ID#: 20221047892), and Vanguard Investment Group Ltd (ID#: 20201958841).

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.

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.

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

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

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

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

RELEVANT TIMES

25. The conduct giving rise to the claims in this Complaint has been ongoing since at least 2021 through the present. Defendants are all currently listed as Colorado businesses³ within the Secretary of State's corporate registry and all continue to list the 17th Street Address as their registered agent address and principal place of business.

GENERAL ALLEGATIONS

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

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

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.

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

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

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

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

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

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

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

33. At least 106 Defendants were created after the 2024 clarification of law, and all Defendants continue to list the virtual mailbox as their registered agent address nearly two years later. Part 2: Moreover, entities have continued to

⁴ *Available at*

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

be registered using this address into 2026, the most recent of which was filed on May 4, 2026.

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

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

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

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

38. With respect to the 17th Street Address, only one individual—Chao Guan, a resident of Shenzhen, China—was authorized to receive mail at the address. Guan submitted a USPS Form 1583 solely on his own behalf as an individual. Guan did not disclose to iPostal or the United States Postal Service that any business entity would receive mail at the address or use the address in corporate filings. Nor did Guan seek or obtain authorization to receive mail on behalf of any other individual or entity.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

IV. Many Defendants appear to have engaged in fraud.

52. Entities located at the 1312 17th Street virtual mailboxes, whether named in this Complaint or in one of the Attorney General’s other concurrently filed complaints, are repeatedly identified in complaints submitted to the Colorado

Attorney General’s Office and in other forums. These complaints involve a wide range of alleged fraudulent activity, including investment and cryptocurrency schemes.

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

- A. Bluzor (ID#: 20201977465) – After depositing cryptocurrency into an account, a Colorado consumer was told that withdrawals were blocked and the consumer needed to send additional cryptocurrency to an external wallet address to pay interest in on a loan in order to unlock or withdraw the funds. The consumer did not receive the funds.
- B. Regal Core Market (ID#: 20201940798) - A consumer complained that they had invested \$30,000 with company which then withheld these funds and refused to give them back to the consumer.
- C. FineX (ID#: 20218078622) - A consumer invested \$168,000 in the cryptocurrency exchange. When the consumer attempted to withdraw their funds, the company required the consumer to pay over \$19,000 in taxes, \$1,680 in other fees, and then requested another \$1,000 to unfreeze the funds. The consumer never received the funds.

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

55. Recovering money from cryptocurrency and online investment scams is often extraordinarily difficult, even for law enforcement, because the schemes are

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.

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

designed to move funds rapidly across jurisdictions, accounts, and technologies specifically intended to frustrate tracing and recovery efforts.

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

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

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

FIRST CLAIM FOR RELIEF

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

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

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

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

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

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

SECOND CLAIM FOR RELIEF
Judicial Dissolution due to obtaining Articles of Organization or
Incorporation through fraud
Colo. Rev. Stat. §§ 7-8-810, 7-8-813, & 7-114-301 through 305

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

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

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

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

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

RELIEF REQUESTED

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

- A. A declaration that Defendants violated the Colorado Consumer Protection Act, C.R.S. § 6-1-105(1)(ppp), by including addresses in documents filed with the Colorado Secretary of State without lawful authority or consent to do so;
- B. A determination that Defendants obtained their articles of organization or incorporation through materially false or fraudulent filings, including the unauthorized use of the 17th Street Address as a registered agent address and principal office address;

- C. Pursuant to C.R.S. §§ 7-80-810 through 7-80-813 and §§ 7-114-301 through 7-114-304, entry of a decree judicially dissolving each Defendant identified in Exhibit A;
- D. Orders directing the winding up and liquidation of Defendants in accordance with applicable provisions of Title 7 of the Colorado Revised Statutes;
- E. An order directing the giving of notice to claimants in accordance with Colo. Rev. Stat. sections 7-90-911 and 7-90-912;
- F. Injunctive and equitable relief necessary to protect the public and preserve the integrity of Colorado's corporate filing system, including orders preventing Defendants from continuing to maintain or rely upon false business registration information filed with the Colorado Secretary of State, pursuant to C.R.S. § 6-1-110(1);
- G. Such additional orders as may be necessary to effectuate dissolution, provide notice to claimants, and carry out the purposes of the Court's decree;
- H. Any additional relief the Court deems just and proper.

Respectfully submitted this 20th day of May, 2026.

PHILIP J. WEISER
Attorney General

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