

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

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CASE NUMBER: 2026CV31840

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

Plaintiff,

v.

ABBYWAKE INC; AC INTERNATIONAL TRADE LTD; ACCUMULATION SPEED INC; ACE UNIT CULTURE MEDIA INC; ACME DOMINATOR INC; ADXC ONLINE MARKETING LIMITED; AETHER MEDIA INC; AETHERTECH INC; AGRHACKLEY AGRICULTURE INC; AHRFD CRYPTO GROUP LTD; AIDOG LTD; AIHAMAY LIMITED; AIRAURRI PNEUMATIC LIMITED; AKJ ONLINE MARKETING LIMITED; ALHAJ AJY LIMITED; ALICE BIOTECHNOLOGY CO., LTD; ALING GROUP LTD; ALISHAN TRADING INC.; ALLIANCEVENTURES INC; ALLWHEELS INC; AMERICA EURASIA RESEARCH INSTITUTE (INTERNATIONAL) PHARMACEUTICAL LTD; AMERICA RUI MI QIN JI BIOLOGY SCIENCE AND TECHNOLOGY CO., LTD; AMERICAN ACCOMPANIMENT CO., LTD; AMERICAN COMET ELECTRONIC INC; AMERICAN DOUGLAS UNIVERSITY; AMERICAN FEIXUN TRADING LTD; AMERICAN HERA YA DUN COSMETICS CO., LTD.; AMERICAN LEAP TRAVEL SERVICE LIMITED; AMERICAN MEDICAL RESEARCH INSTITUTE INC; AMERICAN PACIFIC RIM LUXURY GOODS LOUIS COCO LLC; AMERICAN PAMIO HEALTH CARE PRODUCTS CO., LTD.; AMERICAN PARDUS NEW MATERIALS CO., LTD; AMERICAN PHARMACEUTICAL ASSOCIATION; AMERICAN YANSHU INTERNATIONAL GROUP CO., LTD.; AMERICAN YAYIN CULTURAL MEDIA CO., LTD.; ANGELLIST INTERNATIONAL

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LTD; ANKEOV USA INTERNATIONAL PHARMACEUTICAL LIMITED; ANT FINANCIAL INFORMATION SERVICES INC.; AOS MEDIA INC; APE UNIVERSE LTD; APEX GLOBAL INC; APEX INNOVATIONS GROUP INC; APEX STORYWORKS INC; APEXES MANAGEMENT LTD; APEXLUMEN MEDIA LTD; APOLLOCHIP LIMITED; AQUARIUSINTERACTION MEDIA INC; ARDOUR BIOTECHNOLOGY CO., LTD; ARK TECHNOLOGY LTD.; ARKADEX EXCHANGE INC; AUHHD ONLINE MARKETING LIMITED; AUREAVault TRADING SERVICES INC; AURORA MEDIA INC; AUSTRALIA UNIVERSITY OF SYDNEY HEALTH RESEARCH INSTITUTE LIMITED; AVENUE OF STARS INC; AWHALE LIMITED; AX-KOOL FILM INDUSTRY LTD; AZETHIO CRYPTO GROUP LTD; BAOWU STEEL CO., LTD; BARINDEX WEALTH LTD; BEEGAME LTD; BELLE SOIR INC; BEYOURSUN LTD; BIG SELLER LIMITED; BINADA LTD.; BINLE INC; BIO WELLNESS INC; BIOLOGY PHARMACY LIMITED; BIOYOUTH HEATHCARE BIOTECHNOLOGY COMPANY LLC; BISBISOUS INC; BITLIA LIMITED; BITOPIA LIMITED; BLACK ANGEL CULTURE MEDIA LIMITED; BLAZEHEART INC; BLINK GADGETS LTD; BLUE LAN INTERNATIONAL INC; BLUE PHOENIX (USA) BRAND DEVELOPMENT MANAGEMENT INC; BLUE SEA IMPORT AND EXPORT INC; BLUE SEA INTELLIGENT TECH CORP; BOTANICORE LIMITED; BREUER-HOME LIMITED; BROAD FUTURE MEDIA INC; BTDUEx INC; BUBASA INFORMATION TECHNOLOGY INC; BURLAN CORPORATION; BUTNOBUTT LTD; BUYEZ CO., LIMITED; BUZZBOUNCE CREATIONS LTD; BWXY INC; CAO SHUHONG INVESTMENT INC; CASLE INC; CEHN YING INVESTMENT INC; CENTENNIAL FRONTIER INC; CFR TECHNOLOGY INC; CHAIN X GLOBAL TECHNOLOGY LTD; CHANGSHENGDA LTD; CHARMCARL LIMITED; CHEN XIAO FANG INVESTMENT INC;

CHENGTIAN NETWOR INC; CHICCOM INC;
CHINVV LIMITED; CHO INTERNATIONAL
TRADE LTD; CHRISTIE'S INTERNATIONAL
AUCTION LIMITED; CHUNPIN
BIOTECHNOLOGY CO., LTD; CIYI TRADING
LTD; CL SILVERPEAK LTD; CLARIVATE
ANALYTICS LLC; CL C FLY INTERNATIONAL
LIMITED; CLEAN MILLER LTD.; CLOUD
SHADOW ART GAME STUDIO LIMITED;
CLOUDCELULAR INFORMATION TECHNOLOGY
LTD; CLOUDFORGE TECHNOLOGIES INC.;
CMBIT HOLDINGS LTD.; CMQUEUE LIMITED;
COLOR STONE INC; COLORADO PEAK
PAINTING CO., LTD; CONVERGE TECHNOLOGY
INC.; COODO LLC; COREDRIVE INC; COZYNEST
TRADE INC; CREATOR STUDIO LLC; CREFOLD
TRADING CO., LIMITED; CRESTLINE
SOLUTIONS INC; CRESTPOINT MANAGEMENT
LTD; CRESTWAVE MEDIA INC; CROSS STREET
COMPANY LIMITED; CRYPTOXTRADES
TECHNOLOGY CO., LTD.; CRYSTALBEAUTY
LIMITED; CRYVIS CRYPTO GROUP LTD;
DAILYIO MEDIA LLC; DALIN MEDIA INC;
DAWNRISE LUXE INTERNATIONAL
ENTERPRISES LIMITED; DELL WIS
INTERNATIONAL TRADE INC; DERIWAY INC.;
DEXX LTD; DIAG MEDIA LIMITED; DINGSHENG
MEDIA INC; DIRECT CONTAINER IMPORTS
INC; DRAGON OATH CULTURE MEDIA LTD;
EAST INTERACTIVE INC; EBLETE
BIOTECHNOLOGY INC; ECHO CULTURE MEDIA
LIMITED; ECHO FOUNDRY INC; ECOMLIFE
LIMITED; EDAMAME CLUB LIMITED; EEOJN
INC; ELECTRIC ENERGIZE TOOLS
CORPORATION; EMBERBRANDS INC; ENO
INTERNATIONAL LIMITED; EOJN INC;
EOJNONE INC; ERAYAK INC.; ESTEE LAUDER
(US) INTERNATIONAL LIMITED; ETERNAL
KARLER INTERNATIONAL TRADE LLC;
ETERNAL TRADING LTD; EVERSHERE E-
COMMERCE INC; EXCEL LINK OVERSEAS LTD;
FACAI INTERNATIONAL INC; FANCYLUNA

LIMITED; FATAO INC; FCUINA LIMITED; FEIER INTERNATIONAL PHARMACEUTICAL INC; FERRYMAN LLC; FETION CULTURE MEDIA LLC; FETION TRADE LLC; FIBERMART LIMITED; FIJAH ONLINE MARKETING LIMITED; FLASH ADS LTD; FLASH TRADING LTD; FLIGHT TRADE INC; FLYING FISH TRADE LLC; FOMIKE LIMITED; FOREVISION CO., LTD; FORTUNIA MEDIA INC; FREEDOMDIGITAL SOLUTIONS INC; FRIZZLIFE INC; FU YU TECHNOLOGY INC.; FUCHEN TRADING LTD; FUPAI CULTURAL MEDIA INC; FUSHENG MEDIA INC; FUTURE METAL MANUFACTURING CO., LTD; FUTURE PIXELS MEDIA INC; GADRELY TECHNOLOGY LTD; GAO YING INVESTMENT INC; GEOATON INC; GLADYS GROUP LIMITED; GLAMOURSCENT LTD; GLIMMER HUT INC; GLOBAL APPLY TRADE INC; GLOBAL HEALTH CARE INC; GLOBAL HIGH TECH RESEARCH CENTER, INC.; GLOBAL HORIZON MANAGEMENT LTD; GLOBAL HUB LTD; GLOBAL HUI LTD; GLOBALVISTA E-SHOPPING, INC; GLORY ABCD LLC; GLOTIC MEDIA LIMITED; GLOWCREW INC; GODEN AGRO INC; GOLD FOREST INTERNATIONAL TRADE INC; GOLD MINING TRADING INC; GOLDENBRIDGE TRADING LLC; GORDEN LINK INC; GUANGDA INTERNATIONAL LTD; GUANGJIAN DEVELOPMENT CULTURE MEDIA CO., LTD; GUJI SERVICE INC; GXCYPX CRYPTO GROUP LTD; HAI LAN ZHI MI (USA) INTERNATIONAL GROUP CO., LTD; HAILIW TRADE LIMITED; HALL OF FAME CULTURE MEDIA LTD; HAN CHI WANG LINHAN INVESTMENT INC; HAOTIANW TRADE LIMITED; HAPPY PRODUCTS SALE LLC; HAPPYHOMETOWN LIMITED; HARMONIOUS LTD.; HARVARD BIOMEDICAL RESEARCH INSTITUTE CO., LTD; HATHAWAY INC; HEALTHADDS INC; HEART ENJOYING CULTURE INC; HEATWAVE MEDIA LTD; HEHUI INTERNATIONAL MACHINERY

TRADING CO., LTD; HELEN BISHOP TRADE
LLC; HELEN NETWORK CULTURE MEDIA
LIMITED; HELLO WORLD E-COMMERCE CO.,
LTD; HENCIN INC; HENRY TECHNOLOGY INC;
HESTIA MEDIA INC; HHUANGYUAN LIMITED;
HIG HOO INTERNATIONAL INC; HIGOLA
INTERNATIONAL LTD; HIINST SCENT
TECHNOLOGIES LTD; HITRER CO; HKBYTR
NETWORK INC; HO ORAN INTERNATIONAL
LIMITED; HOME OF GREAT LOVE TRADE
LIMITED; HONESTAR MARKETING LTD; HONG
KONG PHARMACY CHINESE AND WESTERN
MEDICINE RESEARCH LIMITED; HOPE UNION
LIMITED; HORIZON MANAGEMENT LTD.;
HORYXIK LTD; HUA SHENGEN INC; HUA
YANG SHE TRADING LTD; HUACE MEDIA
LIMITED; HUAMEI CAPITAL LTD; HUANG
SHAN INVESTMENT INC; HUANYU TONG
TRADING LTD; HUIDIAN TECHNOLOGY CO.,
LTD; HUNGBO LTD.; HYPERVANGUARD
FINANCIAL & CAPITAL LTD; IDAFUN LIMITED;
IDCXS CRYPTG GROUP LTD; IDCXS CRYPTO
GROUP LTD; IDOLCHRONO WATCH LTD;
ILIJAH LIMITED; IMG MODELS INC; INBRO
CONSULTING GROUP INC; INCREVO INC.;
INTERNATIONAL INSTITUTE OF ENGG
PSYCHOLOGY PUBLISHING HOUSE LLC;
INTERNATIONAL INSTITUTE OF FILM
SCIENCE AND ARTS; INTERNATIONAL
INSTITUTE OF LITERATURE AND ARTS;
INTERNATIONAL TRANSPORT ASSOCIATION
LIMITED; INTERNATIONAL VOCATIONAL
EDUCATION STANDARD COMMITTEE; IVY
LEAGUE FOR INTERNATIONAL EDUCATION; J
TAI INTERNATIONAL LTD.; JAYZON GROUP
INC; JCWC TRADE INC; JEETE TRADE LLC;
JENHO INTERNATIONAL INC; JERICHO
TRADING LLC; JFLOWERS GLOBAL LIMITED;
JIA RONG TRADING INC.; JIAGUAN
STUDYABROAD LIMITED; JIANGSU DING DING
SU PIN NETWORK TECHNOLOGY INC; JIEFENG
MEDIA INC; JIMI INTERNATIONAL TRADING

CO., LTD.; JIN KEER (USA) SLEEP TECHNOLOGY LTD; JINGCHENG TECHNOLOGY CO., LTD; JINJUN NEXUS INC; JIU MELODY COMPANY; JNS SPORT INC; JOYGROVE LLC; JUYIN MEDIA INC; KACH INTERNATIONAL TRADE LTD; KAMAOWL LIMITED; KANG HUBO INVESTMENT INC; KCC INFLATABLE INC; KEFEW LIMITED; KEYANB CRYPTO GROUP LIMITED; KGHOUSE LTD; KHAN INTERNATIONAL LTD; KING KONG BARBIE INC; KITH KIN MEDIA INC; KJHG ONLINE MARKETING LIMITED; K'LABW NATIONAL INC; KLOTHO PHARMACEUTICAL GROUP INC; KOBE .BRYANT (CHINA) CLUB; KOSA TRADING INC; KS EAGLE INC; KUAN SONG SHI DAI INC; KUKESU INC; LAIYIN INTERNATIONAL PHARMACEUTICAL INC; LANCOME (FRANCE) INTERNATIONAL GROUP CO., LTD.; LECTRON MEDIA INC; LEISON GLOBAL INC; LELAND VENTURES LIMITED; LEMON ENTERTAINMENT INC; LEPONI (SWITZERLAND) INTERNATIONAL GROUP CO., LTD.; LEVELRESS TRADING CO., LIMITED; LI DAWEI NVESTMENT INC; LI GLOBALECHO TRADE CO., LTD; LI GUOQING INVESTMENT INC; LI JIADONG INVESTMENT INC; LI ZONGWEI (CHINA) CLUB; LICHENG TRADE LIMITED; LIN YAO INVESTMENT INC; LING LONG LLC; LINOLD LIMITED; LION PACK MEDIA-US LTD; LIONHEART LEGION ENTERTAINMENT INC; LIPRESSNAILS LIMITED; LITTLE FINGER MEDIA INC; LIU QIANLIN INVESTMENT INC; LIVEU CULTURAL MEDIA INC; LIYUGEN INC; LOONGHEART INC; LOTTE MEDIA INC; LOUISFASHION LIMITED; LOUISIGA MEDIA INC; LOVEME MEIDA COMPANY LIMITED; LU BING TRADING INC; LU YI INVESTMENT INC; LU YUNYE INVESTMENT INC; LUCAS LTD; LUCKY ALWAYS LTD.; LUCKY1989 CO., LTD.; LUMENCORE LIMITED; LUMINLQ LIMITED; LUNTUS INTERNATIONAL LTD; LUXESCENT

LTD; LXGC TRADE INC; LYCHEE MIDEA LIMITED; LYUYONGFEI MORED LTD; LZ BRIDGE CONNECT CORP INC; MADAMMEI INTERNATIONAL TRADING LTD; MARIAH INTERNATIONAL LTD; MAXMIN TRADE INC; MD DIGITAL BANIK LTD; MEDACOM COLLEGE LLC; MERIDIAN CONTENT INC; MERRY TRADE. LTD; MG CARD US LTD; MICRO ERA INC; MISMI LTD; MISSFOODVERSE. LTD; MLUZI TRADE INC; MO HAIFA LTD; MONALOA LTD; MONSOON FASHION MANAGEMENT LIMITED; MOONBLOOM INC; MW AGENCY MEDIA LIMITED; NAILSROMANCE INC; NAIRBIN INC; NEBULIDS INC; NETS TECHNOLOGY LIMITED; NEW AGE TRADE CO., LTD; NEW DREAM INC; NEW WORLD SPORTS STORE PROGRAM LTD; NEWREACH SUPPLY CHAIN INC.; NEXAI INC; NEXCOMMERCE MEDIA INC; NEXORA INNOVATIONS INC; NEXTECH INNOVATIONS LTD; NEXUS NARRATIVE INC; NICEYELDA MEDIA INC; NICOLE INC; NINE TRADES INC; NINE TRADES TW INC; NIUFO CRYPTO GROUP LTD; NKSCX CRYPTO GROUP LTD; NO CAP INC; NOVABRIDGE INC; NOVAS INC; NOVATRADE GLOBAL LTD; NOVATREND LIMITED; NOVELGENESIS PUBLISHING INC; OCEANIC CROSSROADS INC; ODDA E-COMMERCE INC; OHIOSA CRYPTO GROUP LTD; ONE FREEDOM LIMITED; ONE PIECE INC; ONE PLUS ONE COMPANY; ONEADHE TRADING INC; ONLY1 INC; ORION DYNAMICS INC; OUR DR CANDY INC; OVALJEWEL LIMITED; OXFORD UNIVERSITY PHD TEAM (UK) INSTITUTE; OXYGEN HEALTH LIFE E-COMMERCE CO., LTD.; PAN JIAYU INVESTMENT INC; PANDAFE LTD; PANTRY LIMITED; PENG HUI INVESTMENT INC; PENNY PARIS INC; PERSIST TRADE INC; PESTAWAY TECHNOLOGIES INC; PETALPAW CO., LIMITED; PIPSPOOL LLC; PLASMA LTD; PLASMA OCEAN LTD; PLEXORA LTD; POPWDAO INC; PRETTY TRANSFERS LIMITED; PRIMEGATE MANAGEMENT

HOLDING GROUP LTD; PRIMEPAK MACHINERY INDUSTRIES CO.; PROMETEX AI LLC; PSA MEDIA INC; PULLA TRADING INC; PULSE COLLECTIVE INC; PULSE CREATORS INC.; PYRAMID ART AUCTION INC; QI HANG TAO JIN CULTURE MEDIA PTY INC; QIAN JIAYING INVESTMENT INC; QIANLONG CULTURE MEDIA INC; QIANYI CULTURAL MEDIA INC; QIYE INTERNATIONAL INC; QUANMIN EXCHANGE LTD; RED ROSE LTD.; REDPIG CULTURE LIMITED; RENOJ INC; RICH FAI CAI INC; RIVERSTONE ENTERPRISES INC; RRDAE LIMITED; RUGGEDCARTS INTERNATIONAL TRADE CO INC; SAFEX PRO INVESTMENT CO., LTD; SAGA US INC; SAIDFOX INC; SAINT VIATOR BOARDING LLC; SAO AGENCY LLC; SAWA MANUFACTURER INC; SCENERY TRADE CO., LIMITED; SCREAM CULTURAL MEDIA CO., LTD; SECURITY FORMULAR LTD; SEE TRADING INC; SEMSCRIM INC; SENCAI INTERNATIONAL INC; SESGAME LIMITED; SHANHAI TECHNOLOGY CO., LTD; SHENGXING INTERNATIONAL INC; SHENGYU INC.; SHENMIAO TRADING CO., LTD; SHI LAI TECHNOLOGY INC.; SHI QUAN JIU MEI LIMITED; SHINING STAR CULTURE MEDIA LIMITED; SHOPEASE INC; SHUJIE MEDIA INC; SHUJUN CULTURE MEDIA CO., LTD; SHUNWANG MEDIA LIMITED; SHUNYUAN TECHNOLOGY DEVELOPMENT INC; SIHAI KUAJING ELECTRONIC COMMERCE INC; SIKONG INC; SILVEROAK HOLDING GROUP LTD; SINCERITY STREAM MEDIA INC; SIX NINE INC; SKYSTAR MEDIA INC; SMART MONKEY INTELLIGENT TECH CORP; SMARTBB TECHNOLOGY LTD; SMILEY TRADING INC; SOFTWARE AGENCY COMPANIES INC; SOLARA INC; SOLSTICE BASICS INFORMATION TECHNOLOGY LIMITED; SOUTHERN STAR INTERNATIONAL INC.; SPARK TECHNOLOGY LTD; SPEED LIGHT LTD; SPEEDYBUY LTD; SSR DREAM INC; STAR CULTURE MEDIA INC; STAR

FIRE MEDIA LIMITED; STAR FLOW MEDIA LIMITED; STAR MAKING DREAM FACTORY INC; STAR PATH INC; STARDUST NETWORK TECHNOLOGY CO., LTD; STARFLOW MEDIA INC; STARLIGHT SHINING CULTURAL MEDIA COMPANY; STARLINE TRADING INC; STARLINK MEDIA GROUP INC; STARLINK MOBILE LIMITED; STARNETCH INC; STARRY NEST INC; STARSTREAM MEDIA INC; STARWAVE MEDIA INC; STARWIN LIMITED; STELLAR MEDIA INC; STELLARA MATRIX INC; STEVE RONKIN JUNFAN LLC; STORYFORGE STUDIOS INC; STRATUS MANAGEMENT LTD.; STRAWBERRY TECHNOLOGY CO., LTD.; SUFORE INC; SUKI TRADING INC; SUMMIT GLOBAL TRADE LTD; SUMMIT GOODS TRADING LLC; SUMMITWEST MANAGEMENT LTD; SUNSHINE MEDICINE CO., LTD; SUPERLUCKY TECHNOLOGY LIMITED; SUPETY LTD; SUREMARKET MEDIA INC; SWEETIE PAWS TRADING COMPANY; SWIFTSSELL MEDIA INC; SYSTEMATIC RISK JOINT GUARANTEE CUSTODY COOPERATION SERVICES CO., LTD; SYTF ONLINE MARKETING LIMITED; SZHUYING LIMITED; TALENTHIVE CO., LTD.; TANG WEIBIN INVESTMENT INC; TANGAN TRADING INC; TARINN INC.; TATTART INC; TENZOR INC; TERRA ALTA INC; TERRAGOODS INC; TG 10 AUTO MOBILES LLC; THE LUXE LINE LTD.; TIANYA INTERNATIONAL PHARMACEUTICAL INC; TIKTOKLIVE LTD; TIKTOP LIMITED; TK ONE INC; TONDA TECHNOLOGY INC; TONTRUST LTD; TOO SPICY LTD; TOP TEDDY LTD.; TSUKI MEDIA LIMITED; TSWHZA CRYPTO GROUP LTD; TT VIDE MALL LTD; TYRIXMA INC; TZNXC CRYPTO GROUP LTD; UBLEU CRYPTO GROUP LTD; UIMI TRADING INC; UK CAMBRIDGE SCIENCE RESEARCH INSTITUTE; UK OXFORD MEDICAL RESEARCH CENTER LTD; ULTRA ENTERTAINMENT INC; UNITED STATES XINLIAN TRADING LTD; UNITY BRIDGE

TRADING LTD; US AIDELAI AGRICULTURAL CHEMISTRY TECH LTD; US BAOJIAN INTERNATIONAL PHARMACEUTICAL INC.; US FMUKE PHARMACEUTICAL GROUP INC; US HUAFANG FOREIGN TRADE INC; US LUCKLIFE NUTRITION FOOD LTD; US MEYERINCK PHARMACEUTICAL GROUP INC.; US TAO GOLD INTERNATIONAL INC; USA BABY CHILDHOOD NUTRITION LIMITED; USA FLIGHT WORRY FREE INTERNATIONAL TRAVEL AGENCY CO., LTD; USA HARVARD ACADEMY OF BIOLOGICAL SCIENCES; VALUEBRIDGE LTD; VERDEVIRTUE LTD; VERVEVERSE RETAIL INC; VIBA SEAR INC; VIBE STAR INC; VIKING MEDIA LTD; VINETIS GROUP LIMITED; VISIONPULSE INC; VIVASTAR CULTURE MEDIA CO., LTD.; VIVID AXIS INC; VIVID VAULT LTD; VIVIDSTAR COLLECTIVE INC; VIVITIM JEWELS INC; VOLCANES INC; VUINT TRADE LIMITED; VUINT TRADE LLC; VYNTOR GLOBAL GROUP LTD; WALETOP INC; WANG LIN INVESTMENT INC; WANGLOB INC; WANTONGTUO INC; WATERMELON INC; WAYEBIO LIMITED; WAYNELIVE MEDIA INC; WE11DONE INC; WEIFENG TRADING INC; WEIMEIKANG TRADING CO., LTD; WEIYANG CHENGHE TRADING LIMITED; WEN CAIHONG INVESTMENT INC; WHALE INTERACTION MEDIA CO., LTD.; WHALE MEDIA CO., LTD.; WHALEECHO LTD; WHIG INTERNATIONAL LTD; WHITE DEER INC; WILLIKAN RAMOSTAN ENVIRONMENTAL TECHNOLOGY LTD; WILLING TECHNOLOGY INC; WIND WINGS INC; WOARY INC; WOJIN ELECTRONIC COMMERCE LTD; WOLFBACKFRAME INC; WU YUE INVESTMENT INC; WUXI TALAT STEEL CO., LTD.; XIAMEN MIJUN TRADING LIMITED; XIHAI TECHNOLOGY LIMITED; XINGLOW MEDIA LIMITED; XIONGTU TRADING INC; XMDFOIL PACKAGING TECHNOLOGY CO., LTD.; XU SHENXIANG INVESTMENT INC; YANG VERVE. LTD; YANKE MEDIA LTD; YANSHI

TRADING LTD; YANZHILIN LIMITED; YAOJU TECHNOLOGY; YCGQ TRADE INC; YELL INTERNATIONAL LTD; YELL INTERNATIONAL TRADE LTD; YF INTERNATIONAL LTD; YHERB WELLNESS GROUP INC; YICHENG BEAUTYBUREAU INC; YINHE TRADING LIMITED; YIWU HANTING E-COMMERCE LIMITED; YOKI INTERNATIONAL TRADE CO., LIMITED; YOLOCA TECH LLC; YOLOECOM LLC; YOULAN INDUSTRIAL LTD; YOURSALES TECHNOLOGY LLC; YUAN TINGXU INVESTMENT INC; YUANJIAN MACHINERY INTL TRA LTD; YUCHENG MEDIA CULTURE INC; YUHAO E-COMMERCE CO., LTD.; YUHUALONG (HK) LIMITED; YUNDING INC; YUNFA TRADING LLC; YUNMO COMPANY LIMITED; ZELING INC; ZENITH MEDIA INC; ZEPHYR LABS INC; ZHANG XIAOYAN INVESTMENT INC; ZHANG XINER INVESTMENT INC; ZHAO SHU WANG INVESTMENT INC; ZHEFU LIMITED; ZHIAI MARKETING LTD; ZHIXIN MEDIA INC; ZHONGGUODAOJIAXUEHUI LTD; ZHONGYU MEDIA INC; ZHOU YUCHEN INVESTMENT INC; ZHUO VANE INC; ZHUXU GLASS ART CO. LTD; ZIREN INTERNATIONAL TRADE LTD; ZJ INTERNATIONAL LTD; ZOOONE LIMITED; ZS HI INTERNATIONAL TRADE INC; ZTMART LIMITED; ZYINGLONG LIMITED; ZYPHSI LTD 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 2199, 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. 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 Anytime Mailbox'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 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 646 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.

16. Defendants also include multiple entities purporting to be colleges and universities, research institutes, and investment platforms, including Oxford University PhD Team (UK) Institute (ID#: 20241841606), AMERICAN DOUGLAS UNIVERSITY (ID#: 20248265593), and CryptoxTrades Technology Co., Ltd. (ID#: 20241544486).

17. Some Defendants have also used names that are similar to well-known commercial brands or public institutions, including: Estee Lauder (US) International Limited (ID#: 20251165960), American Pharmaceutical Association (ID#: 20241865092), Clarivate Analytics LLC (ID#: 20241537452), IMG Models Inc (ID#: 20251723816), and Christie’s International Auction Limited (ID#: 20241727599).

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.

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 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 also will 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 businesses² within the Secretary of State's corporate registry and all continue to list the 17th Street Address as their registered agent address and principal place of business.

GENERAL ALLEGATIONS

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

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

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

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

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

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

² Defendants are currently in various statuses with the Secretary of State; only a judicial dissolution pursuant to C.R.S. § 7-90-1002(1)(e) will ensure that Defendants cannot later be restored to good standing at these same unauthorized addresses.

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

31. Each Defendant listed the 17th Street Address virtual mailbox as its registered agent and principal office address in documents filed with the Colorado Secretary of State.

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).³

33. At least 427 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.

34. The virtual 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.

38. With respect to the 17th Street Address, only one individual—Wei Chunxin, a resident of Sichuan, China—is authorized to receive mail at the address. Wei submitted a USPS Form 1583 solely on their own behalf as an individual. Wei did not disclose to Anytime Mailbox or the United States Postal Service that any

³ *Available at*

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

business entity would receive mail at the address or use the address in corporate filings. Nor did Wei 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 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 42 MSBs are registered to entities purportedly located at Box 2199 of the 17th Street Address.

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 cryptocurrency and investment schemes.

53. With respect to the Defendants named in this specific Complaint, some examples include:⁴

- A. SafeX Pro Investment Co., Ltd (ID#: 20251065679) – Multiple consumers have complained to the Attorney General about SafeXPro. One consumer wrote that they were contacted over WhatsApp by an individual purporting to be the assistant of a professor. The consumer was convinced to invest \$160,000 with the individual. When the consumer tried to withdraw their funds, the individual refused to give the money back unless the consumer paid them \$180,000. Central to issue of their fraudulent status, the consumer noted that they researched the company found that

⁴ 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.

“SafeX Pro is registered in Denver.” The consumer lost all of their investment.

- B. HyperVanguard Financial & Capital LTD (ID#: 20238242354) – One consumer wrote that they were contacted by an individual purporting to be the assistant of a professor. The consumer was convinced to invest \$130,000 with the individual. When the consumer tried to withdraw their funds, the individual refused to give the money back. The consumer lost all of their investment.

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.⁵

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

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

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

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

⁵ Federal Deposit Insurance Corporation, Office of Inspector General, *Pig Butchering Scams*, <https://www.fdicig.gov/pig-butchering-scams>.

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.

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