STATE OF WASHINGTON DEPARTMENT OF FINANCIAL INSTITUTIONS **SECURITIES DIVISION**

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IN THE MATTER OF DETERMINING

Whether there has been a violation of the

Securities Act of Washington by:

Amito Trading Limited,

Chushong Industry Limited,

RS Import Export Trading LLC,

Beautiplus LLC,

Sunny Pacific LLC,

Shuwen Chen,

Jinling Chen,

Rain Shun,

Jin L Sun,

Sun Qian;

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Order No. S-24-3697-24-FO01

AND ENTRY OF **FINDINGS** OF **FACT** CONCLUSIONS OF LAW AND FINAL ORDER TO CEASE AND DESIST, TO IMPOSE FINES, AND TO CHARGE COSTS AS TO AMITO TRADING LIMITED, BEAUTIPLUS LLC, SHUWEN CHEN, CHUSHONG INDUSTRY LIMITED, JINLING CHEN, SUNNY PACIFIC LLC, AND SUN QIAN

THE STATE OF WASHINGTON TO:

Respondents.

Amito Trading Limited Beautiplus LLC Shuwen Chen Chushong Industry Limited, Jinling Chen **Sunny Pacific LLC** Sun Qian

On July 1, 2024, the Securities Administrator of the state of Washington issued Statement of Charges and Notice of Intent to Enter Order to Cease and Desist, To Impose a Fine, and to Charge Costs, Order No. S-24-3697-24-SC01 ("Statement of Charges"). The Statement of Charges, together with a Notice of Opportunity for Hearing ("Notice") and an Application for Adjudicative Hearing ("Application"), were served on Respondents Amito Trading Limited, Beautiplus LLC, Shuwen Chen, Chushong Industry Limited, Jinling Chen, RS Import Export Trading LLC, Rain Shun, Jin L Sun, Sunny Pacific LLC, and Sun Qian (collectively, the "Respondents"), on July 2, 2024. The Notice advised the Respondents that the Application must be received within twenty days from the date of service. Respondents Amito Trading Limited, Beautiplus LLC,

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Shuwen Chen, Chushong Industry Limited, Jinling Chen, Sunny Pacific LLC, and Sun Qian failed to request an administrative hearing within twenty days of service.

The Securities Administrator therefore adopts as final the following Findings of Fact and Conclusions of Law as set forth in the Statement of Charges and enters a final order against Amito Trading Limited, Beautiplus LLC, Shuwen Chen, Chushong Industry Limited, Jinling Chen, Sunny Pacific LLC, and Sun Qian to cease and desist from violations of the Securities Act, and to impose the fines and costs sought in the Statement of Charges.

FINDINGS OF FACT

Respondents

- 1. Amito Trading Company ("Amito") is a New York entity formed on or around April 5, 2023, with its principal place of business in New York.
- 2. Beautiplus LLC ("Beautiplus") is a New Jersey domestic limited-liability company formed on or around August 30, 2023, with its principal place of business in New Jersey.
- 3. Shuwen Chen resided in New Jersey. Shuwen Chen is the sole member of Beautiplus and the sole signatory on its bank account.
- 4. Chushong Industry Limited ("Chushong") is a New York domestic business corporation formed on or around May 2, 2023, with its principal place of business in Brooklyn, New York.
- 5. Jinling Chen resided in New York. Jingling Chen is the president of Chushong and the sole signatory on its bank account.
- 6. RS Import Export Trading LLC ("RS Import") is a Georgia limited liability company formed on or around September 11, 2012, with its principal place of business in Tucker, Georgia.
- 7. Rain Shun resided in Georgia. Rain Shun is a member of RS Import and is a signatory on its bank account.

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- 8. Jin L. Sun resided in Georgia. Jin L. Sun is a member of RS Import and is a signatory on its bank account.
- 9. Sunny Pacific LLC ("Sunny Pacific") is a California limited liability company formed on or around September 18, 2023, with its principal place of business in Agoura Hills, California.
- 10. Sun Qian resided in Diamond Bar, California. Sun Qian is a member of Sunny Pacific and the sole signatory on its bank account.

Related Entities and Person

- 11. Stellar-Finance.com is purportedly a New York firm that offers personalized investment plans to U.S. residents.
- 12. MetaQuotes Software Corp. is a Cyprus corporation that provides software products for financial markets. MetaTrader 5, a product of MetaQuotes Sofware Corp. is a trading platform designed to provide brokerage services directly to customers.

Overview

13. The Respondents participated in a scheme, along with Stellar-Finance.com, to defraud C.N., a Washington resident, out of \$360,000. From approximately April to December of 2023, Stellar-Finance.com and its agents made false or misleading claims about its forex trading platform and offerings and directed C.N. to wire investment funds to the Respondents. The Respondents wired C.N.'s funds to foreign, unrelated entities. C.N. has not been able to withdraw any of her investment or purported gains from Stellar-Finance.com.

Nature of the Conduct

14. In or around 2020, C.N. began using WhatsApp to communicate with friends involved in a social group. Around the same time, C.N. joined the Online Trading Academy, a WhatsApp group, to discuss

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investments and the stock market. In late 2020, C.N. took note of another WhatsApp group that professed to help lay investors learn about investment strategy—the Infinity Learning Group.

- 15. In or around March or April of 2023, C.N. joined the Infinity Learning Group. Within the group, people began to share that they had met the CEO of Stellar-Finance.com (the "CEO"). The CEO led discussions about the stock market, investment strategy, and the Forex market.
- 16. Later, Alice, the administrator of the group and purported assistant to the Stellar-Finance.com CEO, invited C.N. to invest with Stellar-Finance.com by enrolling in an "exclusive" investment plan. Alice, via WhatsApp, guided C.N. through the process of funding the investment plan account. This process included an enrollment form which asked, "What rate of return do you expect on your personalized exclusive investment plan?"—the designated choices being either 100%, 300%, or More.
- 17. Neither Stellar-Finance.com nor Alice provided C.N. with any information regarding the investment—no disclosures, no terms, no relevant financial information.
- 18. Alice initially requested C.N.'s funds be transferred to Stellar-Finance.com from a cryptocurrency wallet. When C.N. shared that she did not have such a wallet, Alice directed her to contact Stellar-Finance.com via chat for wire instructions.
- 19. Stellar-Finance.com customer service, via chat, instructed C.N. to wire funds to RS Import. Stellar-Finance.com directed C.N. that "[i]t's important to avoid filling in any remarks in the wire transfer remarks section. (Highly Important)." However, if "you're required to fill in a nickname, remarks, memos, or transaction purposes, please fill in "Goods and Services". This will allow your funds to be better reflected in your trading account."

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- 20. On or around October 16, 2023, C.N. wired \$30,000 to RS Import's Bank of America account in Tucker, Georgia¹. C.N. funded the deposit by cashing out a certificate of deposit set aside for savings. Alice promised C.N. a 150% return on her investment.
- 21. The same month, RS Import received 49 wires, including C.N.'s funds, amounting to over \$1.8 million dollars. Bank records indicate none of these funds were subsequently transferred to Stellar-Finance.com. Instead, nearly all the money was wired to one of two unrelated entities located in China and Hong Kong.
- 22. C.N. began to initiate "trades" using signals provided to her by Stellar-Finance.com through WhatsApp and the Stellar-Finance.com "app" hosted by MetaTrader 5.
- 23. Soon, C.N.'s returns were purportedly growing at such a rate that she decided to apply for a HELOC to invest more funds into her Stellar-Finance.com investment plan.
- 24. On or around October 20, 2023, Stellar-Finance.com directed C.N. to wire a \$60,000 investment to Sunny Pacific's PNC Bank account in Lynwood, California.
- 25. The same month, Sunny Pacific received four wires, including C.N.'s funds, amounting to over \$235,000—none of which was transferred to Stellar-Finance.com.
- 26. On or around October 31, 2023, Stellar-Finance.com directed C.N. to wire \$20,000 of additional investment funds to Amito's Blue Ridge Bank account in Luray, Virgina.
- 27. On or around November 6, 2023, Stellar-Finance.com directed C.N. to wire \$130,000 to Chushong's PNC Bank Account in Raritan, New Jersey.

 $^{^{\}scriptsize 1}$ The Department of Financial Institutions analyzed bank records associated with the Respondents through December 31, 2023.

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- 28. The same month, Chushong received sixteen wires, including C.N.'s funds, amounting to over \$2.7 million dollars. Bank records indicate no Chushong funds were subsequently transferred to Stellar-Finance.com. Instead, nearly all the money was wired to a single unrelated entity in Hong Kong.
- 29. On or around November 6, 2023, Stellar-Finance.com directed C.N. to wire \$60,000 to Beautiplus's Citibank account in New York, New York.
- 30. The same month, Beautiplus received eleven wires, including C.N.'s funds, amounting to nearly \$700,000. Bank records indicate no Beautiplus funds were subsequently transferred to Stellar-Finance.com. Instead, nearly all the money was wired to a single unrelated entity in Hong Kong.
- 31. At some point, C.N. asked Stellar-Finance.com why it used a network of various, seemingly unrelated business accounts for the wire transfers, including Respondents Amito, Beautiplus, Chushong, RS Import, and Sunny Pacific; Stellar-Finance.com explained that it was a global business with so many money transfers that it needed to use a myriad of accounts to accept the wires.
- 32. After the series of wire transfers, despite the bank records revealing no transfers to Stellar-Finance.com, C.N.'s Stellar-Finance.com account reflected her "deposits."
- 33. C.N.'s investment account balance continued to grow and display significant financial gain. As such, C.N. wanted to withdraw some of her investment profits. Alice provided C.N. a complex set of directions to make a withdrawal from her account, which included downloading a cryptocurrency application. The directives were so confusing that C.N. reached out to a trusted teller at her local bank branch. The teller urged C.N. to not provide any further personal information as she was likely victim of an ongoing fraud.
 - 34. The Respondents provided no response to subpoenas issued by the Securities Administrator. Based upon the above Findings of Fact, the following Conclusions of Law are made:

CONCLUSIONS OF LAW

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- 1. The offer and/or sale of the forex trading program described above constitutes the offer and/or sale of a security as defined in RCW 21.20.005(14) and (17).
- 2. The Respondents Amito Trading Limited, Beautiplus LLC, Shuwen Chen, Chushong Industry Limited, Jinling Chen, Sunny Pacific LLC, and Sun Qian each violated RCW 21.20.010(3), the anti-fraud section of the Securities Act of Washington, by engaging in an act, practice, or course of business which operates or would operate as a fraud or deceit upon any person.

Based upon the foregoing and finding it in the public interest:

FINAL ORDER

IT IS HEREBY ORDERED that Respondents Amito Trading Limited, Beautiplus LLC, Shuwen Chen, Chushong Industry Limited, Jinling Chen, Sunny Pacific LLC, and Sun Qian, and their agents and employees, shall each cease and desist from violating RCW 21.20.010, the anti-fraud section of the Securities Act of Washington.

IT IS FURTHER ORDERED that the Respondents shall be liable for and pay fines in the amounts as follows:

- a. Amito Trading Limited shall be liable for and shall pay a fine of \$10,000;
- b. Beautiplus LLC shall be liable for and shall pay a fine of \$20,000;
- c. Shuwen Chen shall be liable for and shall pay a fine of \$20,000;
- d. Chushong Industry Limited shall be liable for and shall pay a fine of \$10,000;
- e. Jinling Chen shall be liable for and shall pay a fine of \$10,000;
- f. Sunny Pacific LLC shall be liable for and shall pay a fine of \$10,000; and
- g. Sun Qian shall be liable for and shall pay a fine of \$10,000.

IT IS FURTHER ORDERED that the Respondents shall be jointly and severally liable for and pay costs in the amount of \$10,000.

AUTHORITY AND PROCEDURE

This FINAL ORDER is entered pursuant to RCW 21.20.390 and is subject to Chapter 34.05 RCW. Respondents have the right to petition the superior court for judicial review of this agency action under Part V of Chapter 34.05 RCW. Pursuant to RCW 21.20.395(4), a certified copy of this Final Order may be filed in superior court. If so filed, the clerk shall treat the Final Order in the same manner as a superior court judgment as to the fine, and the fine may be recorded, enforced, or satisfied in like manner.

WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.

/s/

SIGNED and ENTERED this 31st day of July, 2024.



William M. Beatty
Securities Administrator
Presented by:
/s/

Megan Campbell Financial Legal Examiner

Approved by:

Brian J. Guerard

Reviewed by:

Chief of Enforcement

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FINAL ORDER

/s/	
Holly Mack-Kretzler Financial Legal Examiner Supervisor	
Financial Legal Examiner Supervisor	