

1
2
3
4
5
6
7
8
9
10

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

IN THE MATTER OF DETERMINING
Whether there has been a violation of the
Securities Act of Washington by:

Amito Trading Limited,
Beautiplus LLC,
Shuwen Chen,
Chushong Industry Limited,
Jinling Chen,
RS Import Export Trading LLC,
Rain Shun,
Sunny Pacific LLC,
Sun Qian;

Respondents.

Order No. S-24-3697-24-CO01

CONSENT ORDER
AS TO RS IMPORT EXPORT TRADING LLC AND
RAIN SHUN

11
12

INTRODUCTION

13
14
15
16
17
18
19
20
21

On July 1, 2024, the Securities Administrator of the Securities Division of the Department of Financial Institutions (“Securities Division”) issued a Statement of Charges and Notice of Intent to Enter Order to Cease and Desist, Impose Fines, and Charge Costs (“Statement of Charges”), S-24-3697-24-SC01, against Respondents Amito Trading Limited, Beautiplus LLC, Shuwen Chen, Chushong Industry Limited, Jinling Chen, RS Import Export Trading LLC, Rain Shun, Sunny Pacific LLC, and Sun Qian (collectively, the “Respondents”). Pursuant to the Securities Act of Washington, RCW 21.20, the Securities Division and the Respondents hereby enter into this Consent Order as to RS Import Export Trading LLC and Rain Shun (hereinafter, the “Consenting Parties”) in settlement of the matters alleged in the Statement of Charges. The Consenting Parties neither admit nor deny the Findings of Fact and Conclusions of Law as set forth below.

22
23

FINDINGS OF FACT

Respondents

1 1. Amito Trading Company (“Amito”) is a New York entity formed on or around April 5, 2023,
2 with its principal place of business in New York.

3 2. Beautiplus LLC (“Beautiplus”) is a New Jersey domestic limited-liability company formed on
4 or around August 30, 2023, with its principal place of business in New Jersey.

5 3. Shuwen Chen resided in New Jersey. Shuwen Chen is the sole member of Beautiplus and the
6 sole signatory on its bank account.

7 4. Chushong Industry Limited (“Chushong”) is a New York domestic business corporation
8 formed on or around May 2, 2023, with its principal place of business in Brooklyn, New York.

9 5. Jinling Chen resided in New York. Jingling Chen is the president of Chushong and the sole
10 signatory on its bank account.

11 6. RS Import Export Trading LLC (“RS Import”) is a Georgia limited liability company formed
12 on or around September 11, 2012, with its principal place of business in Tucker, Georgia.

13 7. Rain Shun resided in Georgia. Rain Shun is a member of RS Import and is a signatory on its
14 bank account.

15 8. Sunny Pacific LLC (“Sunny Pacific”) is a California limited liability company formed on or
16 around September 18, 2023, with its principal place of business in Agoura Hills, California.

17 9. Sun Qian resided in Diamond Bar, California. Sun Qian is a member of Sunny Pacific and the
18 sole signatory on its bank account.

19 **Related Entities**

20 10. Stellar-Finance.com is purportedly a New York firm that offers personalized investment plans
21 to U.S. residents.

1 11. MetaQuotes Software Corp. is a Cyprus corporation that provides software products for
2 financial markets. MetaTrader 5, a product of MetaQuotes Software Corp. is a trading platform designed to
3 provide brokerage services directly to customers.

4 **Overview**

5 12. The Consenting Parties participated in a scheme, along with Respondents Amito Trading
6 Limited, Beautiplus LLC, Shuwen Chen, Chushong Industry Limited, Jinling Chen, Sunny Pacific LLC, Sun
7 Qian, and Stellar-Finance.com, to defraud C.N., a Washington resident, out of \$360,000. From approximately
8 April to December of 2023, Stellar-Finance.com and its agents made false or misleading claims about its forex
9 trading platform and offerings and directed C.N. to wire investment funds to the Respondents. The
10 Respondents wired C.N.’s funds to foreign, unrelated entities. C.N. has not been able to withdraw any of her
11 investment or purported gains from Stellar-Finance.com.

12 **Nature of the Conduct**

13 13. In or around 2020, C.N. began using WhatsApp to communicate with friends involved in a
14 social group. Around the same time, C.N. joined the Online Trading Academy, a WhatsApp group, to discuss
15 investments and the stock market. In late 2020, C.N. took note of another WhatsApp group that professed to
16 help lay investors learn about investment strategy—the Infinity Learning Group.

17 14. In or around March or April of 2023, C.N. joined the Infinity Learning Group. Within the
18 group, people began to share that they had met the CEO of Stellar-Finance.com (the “CEO”). The CEO led
19 discussions about the stock market, investment strategy, and the Forex market.

20 15. Later, Alice, the administrator of the group and purported assistant to the Stellar-Finance.com
21 CEO, invited C.N. to invest with Stellar-Finance.com by enrolling in an “exclusive” investment plan. Alice,
22 via WhatsApp, guided C.N. through the process of funding the investment plan account. This process
23

1 included an enrollment form which asked, “What rate of return do you expect on your personalized exclusive
2 investment plan?”—the designated choices being either 100%, 300%, or More.

3 16. Neither Stellar-Finance.com nor Alice provided C.N. with any information regarding the
4 investment—no disclosures, no terms, no relevant financial information.

5 17. Alice initially requested C.N.’s funds be transferred to Stellar-Finance.com from a
6 cryptocurrency wallet. When C.N. shared that she did not have such a wallet, Alice directed her to contact
7 Stellar-Finance.com via chat for wire instructions.

8 18. Stellar-Finance.com customer service, via chat, instructed C.N. to wire funds to RS Import.
9 Stellar-Finance.com directed C.N. that “[i]t’s important to avoid filling in any remarks in the wire transfer
10 remarks section. (Highly Important).” However, if “you’re required to fill in a nickname, remarks, memos,
11 or transaction purposes, please fill in “Goods and Services”. This will allow your funds to be better reflected
12 in your trading account.”

13 19. On or around October 16, 2023, C.N. wired \$30,000 to RS Import’s Bank of America account
14 in Tucker, Georgia¹. C.N. funded the deposit by cashing out a certificate of deposit set aside for savings.
15 Alice promised C.N. a 150% return on her investment.

16 20. The same month, RS Import received 49 wires, including C.N.’s funds, amounting to over \$1.8
17 million dollars. Bank records indicate none of these funds were subsequently transferred to Stellar-
18 Finance.com. Instead, nearly all the money was wired to one of two unrelated entities located in China and
19 Hong Kong.

20 21. C.N. began to initiate “trades” using signals provided to her by Stellar-Finance.com through
21 WhatsApp and the Stellar-Finance.com “app” hosted by MetaTrader 5.

22
23 ¹ The Department of Financial Institutions analyzed bank records associated with the Respondents through December 31, 2023.

1 22. Soon, C.N.’s returns were purportedly growing at such a rate that she decided to apply for a
2 HELOC to invest more funds into her Stellar-Finance.com investment plan.

3 23. On or around October 20, 2023, Stellar-Finance.com directed C.N. to wire a \$60,000
4 investment to Sunny Pacific’s PNC Bank account in Lynwood, California.

5 24. The same month, Sunny Pacific received four wires, including C.N.’s funds, amounting to over
6 \$235,000—none of which was transferred to Stellar-Finance.com.

7 25. On or around October 31, 2023, Stellar-Finance.com directed C.N. to wire \$20,000 of
8 additional investment funds to Amito’s Blue Ridge Bank account in Luray, Virginia.

9 26. On or around November 6, 2023, Stellar-Finance.com directed C.N. to wire \$130,000 to
10 Chushong’s PNC Bank Account in Raritan, New Jersey.

11 27. The same month, Chushong received sixteen wires, including C.N.’s funds, amounting to over
12 \$2.7 million dollars. Bank records indicate no Chushong funds were subsequently transferred to Stellar-
13 Finance.com. Instead, nearly all the money was wired to a single unrelated entity in Hong Kong.

14 28. On or around November 6, 2023, Stellar-Finance.com directed C.N. to wire \$60,000 to
15 Beautiplus’s Citibank account in New York, New York.

16 29. The same month, Beautiplus received eleven wires, including C.N.’s funds, amounting to
17 nearly \$700,000. Bank records indicate no Beautiplus funds were subsequently transferred to Stellar-
18 Finance.com. Instead, nearly all the money was wired to a single unrelated entity in Hong Kong.

19 30. At some point, C.N. asked Stellar-Finance.com why it used a network of various, seemingly
20 unrelated business accounts for the wire transfers, including Respondents Amito, Beautiplus, Chushong, RS
21 Import, and Sunny Pacific; Stellar-Finance.com explained that it was a global business with so many money
22 transfers that it needed to use a myriad of accounts to accept the wires.

23

1 31. After the series of wire transfers, despite the bank records revealing no transfers to Stellar-
2 Finance.com, C.N.’s Stellar-Finance.com account reflected her “deposits.”

3 32. C.N.’s investment account balance continued to grow and display significant financial gain.
4 As such, C.N. wanted to withdraw some of her investment profits. Alice provided C.N. a complex set of
5 directions to make a withdrawal from her account, which included downloading a cryptocurrency application.
6 The directives were so confusing that C.N. reached out to a trusted teller at her local bank branch. The teller
7 urged C.N. to not provide any further personal information as she was likely victim of an ongoing fraud.

8 33. The Respondents provided no response to subpoenas issued by the Securities Administrator.
9 Based upon the above Findings of Fact, the following Conclusions of Law are made:

10 **CONCLUSIONS OF LAW**

11 1. The offer and/or sale of the forex trading program described above constitutes the offer and/or
12 sale of a security as defined in RCW 21.20.005(14) and (17).

13 2. RS Import Export Trading LLC and Rain Shun each violated RCW 21.20.010(3), the anti-
14 fraud section of the Securities Act of Washington, by engaging in an act, practice, or course of business which
15 operates or would operate as a fraud or deceit upon any person.

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

17 **CONSENT ORDER**

18 IT IS AGREED AND ORDERED that Respondents RS Import Export Trading LLC and Rain Shun,
19 and their agents and employees, shall each cease and desist from violating RCW 21.20.010, the anti-fraud
20 section of the Securities Act of Washington.

21 IT IS AGREED AND ORDERED that Respondents RS Import Export Trading LLC and Rain Shun
22 shall be liable for and pay a fine in the amount of \$20,000.
23

1 IT IS AGREED AND ORDERED that Respondents RS Import Export Trading LLC and Rain Shun
2 shall be liable for and pay costs in the amount of \$2,000.

3 IT IS AGREED that Respondents RS Import Export Trading LLC and Rain Shun entered into this
4 Consent Order freely and voluntarily and with a full understanding of its terms and significance.

5 IT IS AGREED that the Securities Division has jurisdiction to enter this order.

6 IT IS AGREED that in consideration of the foregoing, Respondents RS Import Export Trading LLC
7 and Rain Shun waives their right to a hearing and to judicial review of this matter pursuant to Chapter 34.05
8 RCW.

9 **WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.**

10
11 Signed this 18th day of September 2024.

12 Signed by:

13
14 /s/

15 _____
RS Import Export Trading LLC
Rain Shun, Member

16 Signed by:

17
18 /s/

19 _____
Rain Shun, Individually

20 Approved as to form by:

21
22 /s/

23 _____
Meng Lim, Attorney for Consenting Parties

1
2 SIGNED and ENTERED this 2nd day of October 2024.



8 _____ /s/
9 William M. Beatty
10 Securities Administrator

10 Approved by:

Presented by:

11 /s/
12 _____
13 Brian J. Guerard
14 Chief of Enforcement

11 /s/
12 _____
13 Megan Campbell
14 Financial Legal Examiner

13 Reviewed by:

14 /s/
15 _____
16 Holly Mack-Kretzler
17 Financial Legal Examiner Supervisor