

1 **STATE OF WASHINGTON**
2 **DEPARTMENT OF FINANCIAL INSTITUTIONS**
3 **SECURITIES DIVISION**

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

5 Amito Trading Limited,
6 Beautiplus LLC,
7 Shuwen Chen,
8 Chushong Industry Limited,
9 Jinling Chen,
RS Import Export Trading LLC,
Rain Shun,
Jin L Sun,
Sunny Pacific LLC,
Sun Qian;

10 Respondents.

Order No. S-24-3697-24-SC01

STATEMENT OF CHARGES AND NOTICE OF
INTENT TO ENTER ORDER TO CEASE AND
DESIST, TO IMPOSE A FINE, AND TO CHARGE
COSTS

11 **THE STATE OF WASHINGTON TO:**

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
Sun Qian

12 **STATEMENT OF CHARGES**

13 Please take notice that the Securities Administrator of the State of Washington has reason to believe
14 that Respondents Amito Trading Limited, Beautiplus LLC, Shuwen Chen, Chushong Industry Limited,
15 Jinling Chen, RS Import Export Trading LLC, Rain Shun, Jin L Sun, Sunny Pacific LLC, and Sun Qian
16 (collectively, the "Respondents"); violated the Securities Act of Washington. The Securities Administrator
17 believes these violations justify the entry of an order against the Respondents to cease and desist from such
18 violations, to impose a fine, and to charge costs pursuant to RCW 21.20.390 and RCW 21.20.395. The
19 Securities Administrator finds as follows:
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STATEMENT OF CHARGES

DEPARTMENT OF FINANCIAL INSTITUTIONS
Securities Division
PO Box 41200
Olympia, WA 98504-1200
360-902-8760

1 **TENTATIVE FINDINGS OF FACT**

2 **Respondents**

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

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

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

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

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

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

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

17 8. Jin L. Sun resided in Georgia. Jin L. Sun is a member of RS Import and is a signatory on its
18 bank account.

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

21 10. Sun Qian resided in Diamond Bar, California. Sun Qian is a member of Sunny Pacific and the
22 sole signatory on its bank account.

23 **Related Entities and Person**

1 11. Stellar-Finance.com is purportedly a New York firm that offers personalized investment plans
2 to U.S. residents.

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

6 **Overview**

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

14 **Nature of the Conduct**

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

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

22 16. Later, Alice, the administrator of the group and purported assistant to the Stellar-Finance.com
23 CEO, invited C.N. to invest with Stellar-Finance.com by enrolling in an “exclusive” investment plan. Alice,

1 via WhatsApp, guided C.N. through the process of funding the investment plan account. This process
2 included an enrollment form which asked, “What rate of return do you expect on your personalized exclusive
3 investment plan?”—the designated choices being either 100%, 300%, or More.

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

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

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

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

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

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

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

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

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

7 25. The same month, Sunny Pacific received four wires, including C.N.’s funds, amounting to over
8 \$235,000—none of which was transferred to Stellar-Finance.com.

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

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

13 28. The same month, Chushong received sixteen wires, including C.N.’s funds, amounting to over
14 \$2.7 million dollars. Bank records indicate no Chushong funds were subsequently transferred to Stellar-
15 Finance.com. Instead, nearly all the money was wired to a single unrelated entity in Hong Kong.

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

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

21 31. At some point, C.N. asked Stellar-Finance.com why it used a network of various, seemingly
22 unrelated business accounts for the wire transfers, including Respondents Amito, Beautiplus, Chushong, RS
23

1 Import, and Sunny Pacific; Stellar-Finance.com explained that it was a global business with so many money
2 transfers that it needed to use a myriad of accounts to accept the wires.

3 32. After the series of wire transfers, despite the bank records revealing no transfers to Stellar-
4 Finance.com, C.N.'s Stellar-Finance.com account reflected her "deposits."

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

10 34. The Respondents provided no response to subpoenas issued by the Securities Administrator.

11 Based upon the above Tentative Findings of Fact, the following Conclusions of Law are made:

12 CONCLUSIONS OF LAW

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

15 2. The Respondents Amito Trading Limited, Beautiplus LLC, Shuwen Chen, Chushong Industry
16 Limited, Jinling Chen, RS Import Export Trading LLC, Rain Shun, Jin L Sun, Sunny Pacific LLC, and Sun
17 Qian each violated RCW 21.20.010(3), the anti-fraud section of the Securities Act of Washington, by
18 engaging in an act, practice, or course of business which operates or would operate as a fraud or deceit upon
19 any person.

20 NOTICE OF INTENT TO ORDER THE RESPONDENT TO CEASE AND DESIST

21 Pursuant to RCW 21.20.390(1) and based upon the Tentative Findings of Fact and Conclusions of
22 Law, the Securities Administrator intends to order Amito Trading Limited, Beautiplus LLC, Shuwen Chen,
23 Chushong Industry Limited, Jinling Chen, RS Import Export Trading LLC, Rain Shun, Jin L Sun, Sunny

1 Pacific LLC, and Sun Qian, and their agents and employees, to each permanently cease and desist from
2 violating RCW 21.20.010.

3 **NOTICE OF INTENT TO IMPOSE FINES**

4 Pursuant to RCW 21.20.395, and based upon the Tentative Findings of Fact and Conclusions of Law,
5 the Securities Administrator intends to order that:

- 6 a. Amito Trading Limited shall be liable for and shall pay a fine of \$10,000;
- 7 b. Beautiplus LLC shall be liable for and shall pay a fine of \$20,000;
- 8 c. Shuwen Chen shall be liable for and shall pay a fine of \$20,000;
- 9 d. Chushong Industry Limited shall be liable for and shall pay a fine of \$10,000;
- 10 e. Jinling Chen shall be liable for and shall pay a fine of \$10,000;
- 11 f. RS Import Export Trading LLC shall be liable for and shall pay a fine of \$10,000;
- 12 g. Rain Shun shall be liable for and shall pay a fine of \$10,000;
- 13 h. Jin L. Sun shall be liable for and shall pay a fine of \$10,000;
- 14 i. Sunny Pacific LLC shall be liable for and shall pay a fine of \$10,000; and
- 15 j. Sun Qian shall be liable for and shall pay a fine of \$10,000.

16 **NOTICE OF INTENT TO CHARGE COSTS**

17 Pursuant to RCW 21.20.390, and based upon the Tentative Findings of Fact and Conclusions of Law,
18 the Securities Administrator intends to order that Amito Trading Limited, Beautiplus LLC, Shuwen Chen,
19 Chushong Industry Limited, Jinling Chen, RS Import Export Trading LLC, Rain Shun, Jin L Sun, Sunny
20 Pacific LLC, and Sun Qian shall be jointly and severally liable for and shall pay the costs, fees, and other
21 expenses incurred in the administrative investigation and hearing of this matter, in an amount not less than
22 \$10,000.

23 **AUTHORITY AND PROCEDURE**

1 This Statement of Charges is entered pursuant to the provisions of Chapter 21.20 RCW and is subject
2 to the provisions of Chapter 34.05 RCW. Amito Trading Limited, Beautiplus LLC, Shuwen Chen, Chushong
3 Industry Limited, Jinling Chen, RS Import Export Trading LLC, Rain Shun, Jin L Sun, Sunny Pacific LLC,
4 and Sun Qian may each make a written request for a hearing as set forth in the Notice of Opportunity for
5 Hearing accompanying this Order. If a respondent does not make a hearing request in the time allowed, the
6 Securities Administrator intends to adopt the above Tentative Findings of Fact and Conclusions of Law as
7 final and to enter a permanent order to cease and desist as to that respondent, to impose any fines sought
8 against that respondent, and to charge any costs sought against that respondent.

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10 SIGNED and ENTERED this 1st day of July 2024.



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17 /s/

18 _____
19 William M. Beatty
20 Securities Administrator

21 Approved by:

22 Presented by:

23 /s/

/s/

Brian J. Guerard
Chief of Enforcement

Megan Campbell
Financial Legal Examiner

1 Reviewed by:

2 /s/

3 _____
4 Holly Mack-Kretzler
5 Financial Legal Examiner Supervisor
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