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**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:

Zenith Asset Tech Foundation;
Cirkor Inc.;

Quantum Prosperity Consortium Tech
Foundation;

Novabit Inc.;

InnovaTech Foundation;

EtherGalaxy Inc.;

Wealthtutor Corp.;

Lencoin Tech Corp.;

Dreamadviser Corp.;

Opacoin Tech Corp.;

Fortunebuild Foundation;

Malcoin Tech Corp.;

XR Lily Trading Inc.;

Blue Star CZY Trading LLC;

LPC Wholesales Inc.;

Innovare Fushion Limited;

Airio Inte Ltd;

East Rain Transportation Inc.;

Junxin Qiao;

Rong Fa Trade Inc.,

Respondents.

Order No. S-24-3882-25-SC01

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

THE STATE OF WASHINGTON TO:

**Zenith Asset Tech Foundation
Cirkor Inc.
Quantum Prosperity Consortium Tech
Foundation
Novabit Inc.
InnovaTech Foundation
EtherGalaxy Inc.
Wealthtutor Corp. (CRD 323744)
Lencoin Tech Corp.
Dreamadviser Corp. (CRD 330534)
Opacoin Tech Corp.
Fortunebuild Foundation
Malcoin Tech Corp.
XR Lily Trading Inc.
Blue Star CZY Trading LLC**

**LPC Wholesales Inc.
Innovare Fushion Limited
Airio Inte Ltd
East Rain Transportation Inc.
Junxin Qiao
Rong Fa Trade Inc.**

STATEMENT OF CHARGES

Please take notice that the Securities Administrator of the State of Washington has reason to believe that Respondents Zenith Asset Tech Foundation, Cirkor Inc., Quantum Prosperity Consortium Tech Foundation, Novabit Inc., InnovaTech Foundation, EtherGalaxy Inc., Wealthtutor Corp., Lencoin Tech Corp., Dreamadviser Corp., Opacoin Tech Corp., Fortunebuild Foundation, Malcoin Tech Corp., XR Lily Trading Inc., Blue Star CZY Trading LLC, LPC Wholesales Inc., Innovare Fushion Limited, Airio Inte Ltd, East Rain Transportation Inc., Junxin Qiao, and Rong Fa Trade Inc. (collectively “Respondents”) violated the Securities Act of Washington. The Securities Administrator believes these violations justify the entry of an order against Respondents Zenith Asset Tech Foundation, Cirkor Inc., Quantum Prosperity Consortium Tech Foundation, Novabit Inc., InnovaTech Foundation, EtherGalaxy Inc., Wealthtutor Corp., Lencoin Tech Corp., Dreamadviser Corp., Opacoin Tech Corp., Fortunebuild Foundation, Malcoin Tech Corp., XR Lily Trading Inc., Blue Star CZY Trading LLC, LPC Wholesales Inc., Innovare Fushion Limited, Airio Inte Ltd, East Rain Transportation Inc., Junxin Qiao, and Rong Fa Trade Inc. to cease and desist from such violations, to impose a fine, and to charge costs pursuant to RCW 21.20.390 and RCW 21.20.395. The Securities Administrator finds as follows:

1 **TENTATIVE FINDINGS OF FACT**

2 **Respondents**

3 Foundation Respondents

4 1. Zenith Asset Tech Foundation (“Zenith”) dba “Zenith Asset Investment Education
5 Foundation,” is a Colorado nonprofit corporation with its principal place of business purportedly in
6 Lakewood, Colorado. Zenith was incorporated on May 16, 2024.

7 2. Quantum Prosperity Consortium Tech Foundation (“QP.IEF”) dba “Quantum Prosperity
8 Consortium Investment Education Foundation” is a Colorado nonprofit corporation with its principal place of
9 business purportedly in Lakewood, Colorado. QP.IEF was incorporated on May 16, 2024.

10 3. InnovaTech Foundation (“InnovaTech”) d/b/a “InnovaTech Investment Education
11 Foundation” (f/k/a: AI Pioneer Tech Foundation) is a Colorado nonprofit corporation with its principal place
12 of business purportedly in Lakewood, Colorado.¹ InnovaTech was incorporated on May 16, 2024.

13 4. Wealthtutor Corp. (“WT Finance”) d/b/a “WT Finance” is a New York corporation with its
14 principal place of business purportedly in Albany, New York. Wealthtutor was incorporated on September
15 20, 2022. WT Finance’s CRD number is 323744.

16 5. Dreamadviser Corp. (“DAF”) d/b/a “DAF Finance Institute” is a New York corporation with
17 its principal place of business purportedly in New York, New York. DAF was incorporated on February 1,
18 2024. DAF’s CRD number is 330534.

19 6. Fortunebuild Foundation (“FB Finance”) d/b/a “FB Finance Institute” is a Colorado nonprofit
20 corporation with its principal place of business purportedly at 18121 E Hampden Ave, Unit C, Num 1228,
21 Aurora, CO 80013 (“PM 1228”).² FB Finance was incorporated on May 29, 2024.

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23 ¹ InnovaTech changed its name from AI Pioneer Tech Foundation on June 12, 2024.

² This is a private mailbox address managed by a Colorado franchisee of private mailbox rental services. As discussed further below, this address was used for the incorporation of multiple entities involved in this scheme.

1 14. Respondents Cirkor, Novabit, Lencoinc, Opacoin, EtherGalaxy, and Malcoin will collectively
2 be referred to in this Statement of Charges as “Platform Respondents.” The Platform Respondents all claimed
3 that their principal offices were located at 324 Diamond Bar Blvd, PMB 717, Diamond Bar, CA 91765 (“PM
4 717”)⁴ and used this address as their mailing address. The Platform Respondents all claimed to be
5 cryptocurrency trading platforms.

6 *P2P Respondents*

7 15. XR Lily Trading Inc. (“XR Lily”) is a New York corporation with its principal place of
8 business in Costa Mesa, California. XR Lily was incorporated on July 3, 2024, and was engaged in currency
9 exchanges for investors to trade with the Platform Respondents.

10 16. Blue Star CZY Trading LLC (“Blue Star”) is a New York limited liability company formed on
11 February 28, 2024, with its principal place of business purportedly in Irvine, California. Blue Star claimed in
12 state incorporation filings to run a jewelry store in Irvine, California, but was engaged in currency exchanges
13 for investors to trade with the Platform Respondents.

14 17. LPC Wholesales Inc. (“LPC Wholesales”) is a Virginia corporation with its principal place of
15 business purportedly in Arlington, Virginia. LPC Wholesales was incorporated on September 3, 2024, and
16 was engaged in currency exchanges for investors to trade with the Platform Respondents.

17 18. Innovare Fusion Limited (“Innovare Fusion”) is a UK limited liability company formed on
18 September 10, 2024, with its principal place of business purportedly in England, the United Kingdom.
19 Innovare Fusion was engaged in currency exchanges for investors to trade with the Platform Respondents.

20 19. Airio Inte Ltd. (“Airio”) is a UK limited liability company formed on August 1, 2024, with its
21 principal place of business purportedly in London, England. Airio claimed in its incorporation filings to be a
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⁴ This is a private mailbox address managed by a California franchisee of private mailbox rental services.

1 graphic and digital studio that designs and develops eCommerce websites, apps, and tailor-made digital
2 solutions, but was engaged in currency exchanges for investors to trade with the Platform Respondents.

3 20. East Rain Transportation Inc. (“ERT”) is a California corporation with its principal place of
4 business purportedly in West Covina, California. ERT was incorporated on June 26, 2020. ERT claimed in
5 state incorporation filings to run a transportation warehousing and logistics business but was engaged in
6 currency exchanges for investors to trade with the Platform Respondents.

7 21. Junxin Qiao has been the Chief Executive Officer, Secretary, and Chief Financial Officer of
8 ERT since January 14, 2023. He is the sole control person of ERT’s bank account at Bank of America, which
9 was used to effectuate transactions in the cryptocurrency investment schemes.

10 22. Rong Fa Trade Inc. (“RFT”) is a Washington corporation with its principal place of business
11 purportedly in Flushing, New York. RFT was incorporated on May 14, 2024. RFT was engaged in currency
12 exchanges for investors to trade with the Platform Respondents.

13 23. Respondents XR Lily, Blue Star, LPC Wholesales, Innovare Fusion, Airio, ERT, and RFT will
14 collectively be referred to in this Statement of Charges as “P2P Respondents.” The Platform Respondents
15 instructed investors to wire transfer funds to accounts in the names of the P2P Respondents, who would
16 purportedly convert the funds to Tether (USDT)⁵ and then deposit the converted funds into the investors’
17 accounts with the Platform Respondents.

18 **Related Parties**

19 24. AinoTrust Incorporations Corp. (“AinoTrust”) is a Colorado corporation with its principal
20 place of business purportedly at 1360 S. Valley Vista Dr., Diamond Bar, CA, 91765. AinoTrust was
21 incorporated on October 11, 2022. AinoTrust served as registered agent and incorporated hundreds of entities
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⁵ USDT is a cryptocurrency stablecoin and pegged to the US dollar (e.g., 1 USDT = 1 USD). See <https://tether.to/en/how-it-works>.

1 in the U.S., including one of the Foundation Respondents, DAF. AinoTrust was also a purported private fund
2 which DAF claimed to advise.

3 25. Nanjing Ainuo Business Consulting Co., Ltd., (“Nanjing Ainuo”) d/b/a “AinoTrust” is a
4 Chinese limited liability company with its principal place of business in China. Nanjing Ainuo was formed
5 on May 18, 2020, and purportedly maintains a U.S. office at 1360 S. Valley Vista Dr., Diamond Bar, CA,
6 91765, the same address as AinoTrust.

7 26. Yilu Ji (“Ji”) is the executive and shareholder of Nanjing Ainuo. Ji applied for PM 717 on
8 March 13, 2023, which has been used to incorporate the Platform Respondents in Washington between April
9 9, 2024 and May 20, 2024. Ji also applied for PM 1228 and PM 2955, which have been used to incorporate
10 two of the Foundation Respondents, FB Finance Institute and InnovaTech, respectively.

11 **Overview**

12 27. The Respondents defrauded investors through elaborate cryptocurrency scams that utilized
13 fake education foundations, fake securities token offerings, fake AI generated investment trading signals, and
14 fake trading platforms. At least 38 investors lost nearly \$9.9 million in these scams, including three
15 Washington residents who invested approximately \$49,000.

16 28. The scams typically started from advertisements by alleged financial educational institutions
17 (“Foundation Respondents”) on social media, including Facebook, Instagram, and LinkedIn. The Foundation
18 Respondents claimed to provide free investment trainings to potential investors, touting AI systems that could
19 provide investors with trade signals that effectively timed the cryptocurrency investment markets. Interested
20 investors then joined chat groups on WhatsApp and Telegram to receive trainings and trade signals for further
21 participation.

22 29. Inviting investors to test out the trading signals, the Foundation Respondents asked investors
23 to place test trades in cryptocurrency on designated trading platforms (“Platform Respondents”), accessible

1 from both websites and apps. These designated trading platforms would later turn out to be fraudulent and a
2 key part of the overall scam. After investors opened an account on the trading platform and made a few
3 successful trades, the Foundation and Platform Respondents convinced investors to invest their personal
4 funds.

5 30. The Foundation and Platform Respondents directed investors to third parties to assist with
6 depositing funds onto the fraudulent trading platforms (“P2P Respondents”). The role of the P2P Respondents
7 was to purportedly convert the investors’ investment funds into cryptocurrencies and deposit them into
8 investor accounts at the trading platforms.

9 31. The Platform Respondents further defrauded investors through an advance fee scam. The
10 Platform Respondents misrepresented to investors that they would be allowed to withdraw their purported
11 investment gains after paying various previously-undisclosed fees. In desperation, many investors paid this
12 advance fee, but none received any of their investment funds back.

13 **Nature of the Conduct**

14 *The Zenith / Cirkor Scheme*

15 32. From approximately January 2024 to June 2025, Zenith (assetoc.com) and Cirkor
16 (clockbits.com) defrauded at least 14 investors (including at least one Washington investor) out of almost \$7.4
17 million. Zenith lured investors to a purported crypto asset trading platform, Cirkor, which claimed to hold
18 regulatory licenses. Zenith gained investors’ confidence with purportedly AI-generated investment signals,
19 manipulated investors into investing in fictitious security token offerings (“STOs”), and caused investors to
20 pay fraudulent fees to withdraw funds.

21 33. Zenith solicited investors to join WhatsApp groups by posting advertisements on social media
22 platforms for free educational training regarding investments in financial markets. While claiming to be a
23 nonprofit educational institution, Zenith acted as an investment adviser by entering into Personalized Service

1 Donation Agreements (“Donation Agreements”) with the investors, pursuant to which Zenith would provide
2 investors purported “trading signals” (i.e., timing and quantity of trading) for currency surfing,⁶ utilizing a
3 quantitative intelligence system named “FINQbot.” In exchange, investors would pay Zenith a certain
4 percentage of the profits gained during the service term. According to FINQbot’s brochure, FINQbot claimed
5 that its prediction achieved “a market accuracy of over 85%” and that “in multiple test groups,” its “user
6 satisfaction score exceed[ed] 90%.”

7 34. In the WhatsApp group chats, Zenith distributed investment lectures and trading signals.
8 Zenith also required investors to follow the trading signals strictly by uploading screenshots of each
9 transaction.

10 35. The Donation Agreement provided six levels of membership based on the initial deposits of
11 investment funds, ranging from \$10,000 to become a “Premium Member 1” to \$3,000,000 to qualify as a
12 “Shareholder Member TOP 1.” In promotional materials, Zenith claimed that higher levels of membership
13 would enable members to use FINQbot more frequently, leading to greater profits. For example, “Premium
14 Members,” with an initial investment of \$10,000, could receive FINQbot signals 3 to 5 times a day, while
15 “Shareholder Members” who deposited \$3,000,000 could supposedly receive unlimited FINQbot signals and
16 a free family Royal Caribbean cruise.

17 36. Under the Donation Agreement, investors had to deposit investment funds in their accounts
18 with Cirkor. To transfer investment funds, Cirkor required investors to deposit funds through bank accounts
19 held by the P2P respondents, including XR Lily, Blue Star, LPC Wholesales, Innovare Fusion, and Airio, as
20 well as through cryptocurrency transfers to designated digital wallets. Cirkor also provided purported short-
21 term loans to investors in preparation for securities token offerings. These loans were not real in the sense that
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⁶ Currency surfing refers to short-term cryptocurrency transactions on trading platforms.

1 money was not actually loaned to investors. Rather, they were a means to defraud investors by requiring
2 investors to repay the purported loan before they could withdraw funds from Cirkor.

3 37. Zenith promoted different token offerings, including self-issued ZIA tokens, EVH tokens, and
4 HMB tokens. In October 2024, Zenith issued 300 million ZIA tokens through Cirkor, purportedly to support
5 the development of FINQbot. Zenith gifted 2,000 ZIA tokens to each investor who participated in the test of
6 the FINQbot system. Investors could also earn more ZIA tokens via raffles on the Zenith website. As of
7 December 18, 2024, Zenith claimed that the ZIA token had a market value exceeding \$500 million. However,
8 on January 13, 2025, Zenith claimed that the ZIA tokens plunged to “less than \$150 million” because Zenith
9 had supposedly guaranteed loans which investors had failed to repay.

10 38. In November 2024, Zenith promoted the EVH project and represented that 80 million EVH
11 tokens would be publicly offered, with at least \$240 million to be raised. Zenith represented that the EVH
12 project aimed to fund the development of EvaHealth, a blockchain-based platform for the healthcare industry.
13 By repeatedly advertising “zero risk” in each stage of the subscription and promising an increase of 8 to 10
14 times the value in EVH tokens, Zenith encouraged investors to make the “fastest, earliest, and largest
15 subscriptions.” Cirkor later announced that investors could subscribe to a total of 400 million EVH tokens in
16 USDT between November 26, 2024 and December 3, 2024. The tokens would be allocated with priorities
17 given to earlier subscriptions and larger subscription amounts. At least one investor made a \$176,400
18 investment, purportedly subscribing to 6,063 EVH tokens.

19 39. In December 2024, Zenith promoted a fake HMB token offering associated with the
20 HumanBlock project (<https://www.humanblock.site/>), a humanoid robot platform, without disclosing the
21 issuer or developer of the token. The HumanBlock project was credited to a “John Doe,” who purportedly had
22 over 15 years of robotics and automation industry experience and developed several robotic projects that the
23 Securities Division was not able to verify. Cirkor assigned HMB a high rating as a good investment,

1 encouraging investors to subscribe to a total of 500 million HMB tokens at the unit price of 4.5 USDT between
2 December 23, 2024 and December 30, 2024. On January 5, 2025, Cirkor announced that HMB would
3 officially launch for spot trading with the opening price set at 101.66 USDT, and suggested investors contact
4 Zenith for “tailored trading advice.”

5 40. Following the trading, investors could see purported profits in their Cirkor accounts. However,
6 they were unable to withdraw any profits without paying various advance fees, including the donation as set
7 out in the Donation Agreement, repayment of purported Cirkor loans, or service fees. Investors were not
8 allowed to offset the fees with profits earned, but could only pay with their additional personal funds. While
9 one investor reported \$600 of successful withdrawals before he became a premium member, no other investor
10 contacted by the Securities Division has successfully withdrawn any of their investment or alleged profit.⁷

11 *The QP.IEF / Novabit Scheme*

12 41. From approximately July 2024 to February 2025, QP.IEF (<https://www.quantumcut.com/>) and
13 Novabit (<https://www.novabit.store/>) defrauded at least nine investors (including at least one Washington
14 investor) out of at least \$66,000. QP.IEF lured investors to a purported crypto asset trading platform, Novabit,
15 which claimed to hold regulatory licenses. QP.IEF gained investors’ confidence with purportedly AI-
16 generated investment signals, manipulated investors into investing in fictitious STOs, and caused investors to
17 pay fraudulent fees to withdraw funds.

18 42. QP.IEF advertised itself on Facebook as a nonprofit organization that provided investment
19 educational training to investors. QP.IEF advised investors to follow the trading signals, which were
20 purportedly generated by FINQbot, the same quantitative intelligence system advertised by Zenith.

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⁷ Allowing early withdrawals of small amounts to induce victims to invest larger amounts is a common scam tactic. *See*
<https://www.michigan.gov/consumerprotection/protect-yourself/consumer-alerts/scams/cryptocurrency-scam-pig-butchering>.

1 47. From approximately August 2024 to February 2025, InnovaTech
2 (<https://www.intelligentech.com>) and EtherGalaxy (<https://h5.etherbits.com>) defrauded at least five investors
3 (including at least one Washington investor) out of at least \$280,000. InnovaTech lured investors to a
4 purported crypto asset trading platform, EtherGalaxy, which claimed to hold regulatory licenses. InnovaTech
5 gained investors' confidence with purportedly AI-generated investment signals, manipulated investors into
6 investing in fictitious STOs, and caused investors to pay fraudulent fees to withdraw funds.

7 48. InnovaTech advertised itself on Facebook as a nonprofit organization that provided investment
8 educational training to investors. InnovaTech advised investors to follow the trading signals purportedly
9 generated by FINQbot, the same quantitative intelligence system advertised by Zenith.

10 49. While InnovaTech initially provided free financial advice to investors, it required investors to
11 enter into a Currency Surfing Asset Allocation Cooperation Agreement ("Cooperation Agreement") to acquire
12 premium membership status, which allowed investors to access more trading signals with fewer restrictions
13 on transactions.

14 50. Under the Cooperation Agreement, InnovaTech promised to provide investment advice on
15 "Currency Surfing" and to achieve a 200% to 300% return for investors. The investors, in exchange, would
16 invest in the surfing account with EtherGalaxy, which was the supervising party under the Cooperation
17 Agreement. Investors had to "donate" a certain percentage of the realized profits to InnovaTech before they
18 could withdraw any funds. At least two investors entered into the Cooperation Agreements with InnovaTech
19 and EtherGalaxy.

20 51. InnovaTech and EtherGalaxy took funds from investors through designated bank accounts, as
21 well as through cryptocurrency transfers to designated digital wallets. InnovaTech even told at least one
22 investor to lie to their bank about the purpose of the transfer as "buying electrical appliances" instead of crypto
23 investment. Like Cirko, EtherGalaxy also provided purported short-term loans to investors in preparation for

1 STOs. EtherGalaxy did not disburse any cash loan proceeds to investors. Rather, investors would only see a
2 purported increase of their account balance so that they could use it to subscribe to fictitious STOs.

3 52. Investors used the funds to trade tokens, including INH tokens issued by InnovaTech as well
4 as fictitious STOs such as HMB and EVH that were also promoted by Zenith.

5 53. In September 2024, InnovaTech issued fake INH tokens to purportedly raise funds for the
6 development of FINQbot, the same AI algorithm allegedly used by Zenith and QP.IEF. EtherGalaxy later
7 announced the INH airdrop event and falsely stated that the INH token was listed on its exchange in 2019,
8 contradicting the INH White Paper published in 2024. Each investor who registered with EtherGalaxy would
9 receive free INH tokens. By showing fabricated graphs and price charts, InnovaTech told investors to prepare
10 enough funds to buy larger quantities of INH because the price of INH tokens would increase from \$1 to \$3
11 in half a year and finally to \$10 in a year.

12 54. In November 2024, InnovaTech promoted the EVH pre-STO project, which was also
13 announced via the EtherGalaxy platform. InnovaTech claimed that EVH would be launched to the general
14 public in the following week, and used a variety of high-pressure tactics to encourage at least one investor to
15 put more funds into EVH, such as claiming that “the sooner you subscribe to EVH, the greater your chance
16 of winning.” The EVH whitepaper claimed that the token would be used to power the EvaHealth platform, a
17 blockchain-based platform designed to be implemented in the healthcare industry. InnovaTech claimed to at
18 least one investor that the subscription of the EVH at the pre-STO stage was a “risk-free” project and the
19 investor’s funds would be “multiplied several times” after successful subscriptions.

20 55. Starting in December 2024, InnovaTech and EtherGalaxy promoted the same fake HMB token
21 as Zenith and Cirkor. Ethergalaxy announced HMB’s opening price as 101.66 USDT and suggested the
22 investors contact the Foundation service provider for “tailored trading advice.” InnovaTech repeatedly stated
23 that the HMB was expected to earn a return of 1500% to 2700% and urged investors to take out P2P loans to

1 prepare the funds for subscription, representing that “I can guarantee that you will make 100% profit. If you
2 don’t make money, you don’t have to pay interest.”

3 56. At least one investor reported an increase of the EtherGalaxy account balance to over \$3.1
4 million, after trading with an initial investment of \$100,000. However, investors were unable to withdraw any
5 profits without paying undisclosed fees, such as repayment of P2P loans and donations to InnovaTech.
6 EtherGalaxy asked investors to make new deposits for loan repayments instead of offsetting them with alleged
7 profits. While one investor reported one initial successful withdrawal, no other investor has been able to
8 withdraw any of their investment or alleged profits.

9 *The WT Finance / Lencoin Scheme*

10 57. From approximately August 2024 to December 2024, WT Finance
11 (<https://www.wealthtutor.com>) and Lencoin (<https://lencoin.net>) defrauded at least six investors out of almost
12 \$2 million. WT Finance lured investors to a purported crypto asset trading platform, Lencoin, which claimed
13 to hold regulatory licenses. Lencoin gained investors’ confidence with purportedly AI-generated investment
14 signals; manipulated investors into investing in fictitious STOs; and caused investors to pay fraudulent fees to
15 withdraw funds.

16 58. WT Finance advertised itself on Facebook as a nonprofit organization that provided investment
17 educational training to investors. WT Finance filed a Form ADV with the Securities and Exchange
18 Commission (“SEC”) to claim exempt reporting adviser (“ERA”) status, but withdrew its ERA status on July
19 11, 2024, and has not registered as an investment adviser since then.

20 59. WT Finance invited investors to WhatsApp groups to receive investment advice purportedly
21 provided by an AI-driven analytical system. WT Finance later invited investors to enter into an “Ai Wealth
22 Creation 4.0 Strategic Partnership Investment Agreement” (“Partnership Agreement”) to facilitate the launch
23 of the “Ai Wealth Creation 4.0 investment system” by participating in AI-driven crypto trades.

1 60. The Partnership Agreement involved three parties: WT Finance as Party A to provide
2 customized investment advice to investors with targeted return during the contract terms; Investors as Party
3 B to participate in the testing of the Ai Wealth Creation 4.0 system by trading WFI tokens issued by WT
4 Finance; and Lencoin as Party C to facilitate the transactions via its platform.

5 61. Under the Partnership Agreement, investors were required to deposit a certain amount of
6 investment funds in Lencoin while WT Finance promised to provide investment advice in achieving the
7 targeted return. Investors were not allowed to withdraw any funds prior to the expiration of the Partnership
8 Agreement. Additionally, if investors achieved the target return, they were obligated to pay a certain
9 percentage of the net profits to subscribe the Ai system post-launch and to pay for WT Finance’s service fees
10 before they could withdraw any funds.

11 62. As instructed by WT Finance and Lencoin, investors wire transferred money or transferred
12 cryptocurrencies to accounts held by some of the P2P Respondents, including East Rain Transportation Inc.⁸
13 and Rong Fa Trade Inc.

14 63. Upon setting up accounts with Lencoin, investors participated in fake crypto trading as well as
15 Initial DEX Offerings (“IDOs”)⁹ and Initial Coin Offerings (“ICOs”), following purported AI-generated
16 trading signals. In addition, WT Finance initiated an IDO by supposedly minting 1 billion WFI tokens, 150
17 million of which would be offered in the IDO. The offering was purportedly to raise funds for the research
18 and development of the “Ai Wealth Creation 4.0” investment system. The whitepaper of the WFI token,
19 however, was nearly identical to the whitepaper of the DAF token, another fictitious token described below in
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22 ⁸ ERT’s primary business specified in its Articles of Incorporation was “transportation,” and it has never been registered as a
money services business.

23 ⁹ An Initial DEX Offering is a decentralized crowdfunding method where blockchain projects sell tokens directly to the public
through a decentralized exchange (DEX). *See* <https://academy.binance.com/en/glossary/initial-dex-offering-ido>.

1 “the DAF/Opacoin Scheme.” WT Finance also promoted several tokens promoted by other companies
2 involved in this scheme, such as BCX, QBL, and MFN.

3 64. WT Finance encouraged investors to invest in the token offering as much and as early as
4 possible, even by taking out “loans” from Lencoin. However, Lencoin never actually disbursed funds from
5 these “loans” to investors, and the only documentation of the “loans” was a purported increase in investors’
6 account value on the Lencoin platform. The loan contracts also required investor-borrowers to deposit a
7 “collateral amount” equal to 10% of the loan amount prior to obtaining the full loan proceeds.

8 65. Investors were initially shown purported investment profits in Lencoin accounts, but were told
9 they would be unable to withdraw any profits without paying various advance fees, such as service fees to
10 WT Finance or repayment of Lencoin loans. Neither WT Finance nor Lencoin disclosed that investors were
11 not allowed to offset the obligations with profits earned but could only pay with their additional personal
12 funds. To the Securities Division’s knowledge, no investor has been able to withdraw any of their investment
13 or alleged profits.

14 *The DAF / Opacoin Scheme*

15 66. From approximately July 2024 to April 2025, DAF (<https://www.dreamadviser.com/>) and
16 Opacoin (<https://h5.opacoin.vip>) defrauded at least four investors (including at least one Washington investor)
17 out of approximately \$132,500. DAF lured investors to purported crypto asset trading platform, Opacoin,
18 which claimed to hold regulatory licenses. DAF gained investors’ confidence with purportedly AI-generated
19 investment signals; manipulated investors into investing in fictitious STOs; and caused investors to pay
20 fraudulent fees to withdraw funds.

21 67. DAF advertised itself on Facebook as a nonprofit organization that provided investment
22 educational training to investors. DAF also filed a Form ADV with the SEC to claim ERA status. Though
23 DAF reported its CRD Number as 330534, it withdrew its ERA status on December 2, 2024. Additionally,

1 the contact person listed in both the ERA filing and in DAF's incorporation filing lives in Texas and does not
2 appear to be involved in the financial or cryptocurrency industries.

3 68. When interested investors contacted DAF for more information, DAF invited them to
4 WhatsApp chats, where DAF posted lectures and investment advice purportedly provided by an AI-driven
5 analytical system.

6 69. DAF later invited investors to enter into an "Ai Profit Algorithms 4.0 Strategic Partnership
7 Investment Agreement" ("Partnership Investment Agreement"). Investors would purportedly test out the AI
8 algorithm by participating in the AI-driven crypto trading on the Opacoin platform. DAF offered a total of six
9 levels of partnership with different funding requirements. Higher levels of partnership received more frequent
10 trading signals and were promised higher return rates, much like the Zenith/Cirkor scheme.

11 70. DAF required investors to strictly follow the "trading signals" purportedly generated by the AI
12 algorithm. The trading signals specified the name of the smart contract (token name), leverage ratio, order
13 type, direction (sell or buy), and contract quantity. After each trade, investors had to upload screenshots of
14 their transactions and profits earned to the group chat for verification.

15 71. Upon registering with Opacoin, investors deposited investment funds through wire transfers as
16 well as transfers of cryptocurrencies to accounts designated by DAF and Opacoin. Investors participated in
17 fake crypto trading as well as IDOs and ICOs.

18 72. For example, DAF issued one billion DAF tokens to raise funds for the research and
19 development of the "Ai Profit Algorithms 4.0" system. DAF's White Paper was nearly identical to the WFI
20 White Paper. DAF also promoted tokens such as BCX, QBL, and MFN, the same IDOs/ICOs as in WT
21 Finance's scheme. Additionally, Opacoin required investors to pay DAF "a certain percentage of the net
22 profits" as a service fee before they could withdraw any assets from their accounts.

1 73. Investors could see purported profits in Opacoin accounts, but were told they would be unable
2 to withdraw any profits without paying various advance fees. Neither DAF nor Opacoin disclosed that
3 investors were not allowed to offset the fees with trading profits but could only pay with their additional
4 personal funds. To the Securities Division’s knowledge, no investor has been able to withdraw any of their
5 investment or alleged profits.

6 *The FB Finance Institute / Malcoin Scheme*

7 74. From approximately June 2024 to the June 2025, FB Finance Institute
8 (<https://www.fortunebuild.com>) and Malcoin (<https://h5.macltd.vip/>; <https://malcoin.vip>; <https://malcoin.ltd>;
9 <https://globalmalcoin.net>) defrauded at least five investors out of at least \$674,550. FB Finance lured investors
10 to a purported crypto asset trading platform, Malcoin, which claimed to hold regulatory licenses. FB Finance
11 gained investors’ confidence with purportedly AI-generated investment signals, manipulated investors into
12 investing in fictitious STOs, and caused investors to pay fraudulent fees to withdraw funds.

13 75. FB Finance Institute advertised itself on social media as a nonprofit organization that provided
14 investment education. When interested investors contacted FB Finance Institute for more information, they
15 were invited to WhatsApp groups, where FB Finance Institute posted lectures and investment advice,
16 including “trading signals” purportedly generated by an AI-driven analytical system, “AI Financial Genie
17 4.0.”

18 76. FB Finance Institute designated Malcoin as the trading platform for investors to trade
19 cryptocurrencies. Upon registering with Malcoin, investors deposited investment funds through wire transfers
20 as well as transfers of cryptocurrencies to accounts designated by FB Finance Institute and Malcoin. Malcoin
21 also provided fake short-term loans to investors in preparation for STOs, like other Platform Respondents in
22 similar schemes.

1 77. FB Finance Institute provided investors with trading signals, which specified the contract name
2 (token name to trade), leverage ratio, order type, position size, and direction (e.g., buy in or sell out). FB
3 Finance Institute required investors to follow these trading signals on Malcoin, and to post screenshots of their
4 transactions to the WhatsApp group after each transaction.

5 78. Investors also participated in fake token offerings, such as FFI and MAL. FB Finance Institute
6 issued one billion FFI tokens to “propel the development of the ‘AI Financial Genie 4.0’ investment system,”
7 which it claimed as an AI-driven quantitative analysis tool to assist in making financial investment decisions.

8 79. Investors could see purported profits in Malcoin accounts. Malcoin failed to disclose that
9 investors had to make new deposits for loan repayments, instead of offsetting them with purported trading
10 profits. While one investor reported successful withdrawals initially, there are no other known instances of
11 investors successfully withdrawing profits without paying various advance fees.

12 *Omissions and Misrepresentations by the Foundation and Platform Respondents*

13 80. The Foundation Respondents, Zenith, QP.IEF, and InnovaTech misrepresented the existence
14 of the FINQbot system, which purportedly generated trading signals for investors to follow in trading tokens
15 such as ZIA, EVH, HMB, QPC, and INH. The Securities Division, however, was not able to find any records
16 of the tokens being traded or listed in any legitimate trading platforms, meaning that FINQbot was providing
17 fraudulent “advice” on nonexistent tokens.

18 81. Even if the FINQbot system existed, the Foundation Respondents, Zenith, QP.IEF, and
19 InnovaTech failed to disclose material information related to the function of the FINQbot system. For
20 example, FINQbot’s brochure claimed that it could complete complex market analysis and provide highly
21 accurate investment advice (“FINQbot achieves a market prediction accuracy of over 85%”), but failed to
22 disclose the source of data, the assumptions used to program the quantification system, the deviation rate from
23 the actual result, why it could promise a 100% return, and what risks were associated with the program’s

1 application in crypto surfing (e.g. automated trading embedded in the investor’s account, unspecified leverage,
2 or data breaches).

3 82. The Platform Respondents claimed that they registered as Money Services Businesses with
4 FinCEN, but failed to disclose that these registrations did not represent FinCEN’s recommendation, approval,
5 or endorsement of the Platform Respondents. In addition, the Platform Respondents failed to disclose that
6 they and the P2P respondents were required to obtain a Money Transmitter or Currency Exchange license
7 from Washington State to effectuate investments in cryptocurrencies from investors’ personal funds. Rather,
8 Zenith, Cirkor, WT Finance, and Lencoin misrepresented the business nature of XR Lily, Blue Star, LPC
9 Wholesales, Innovare Fusion Limited, Airio, ERT, and RFT, misleading investors to believe that the entities
10 were legitimately in the business of effecting cryptocurrency transactions. For example, ERT claimed to run
11 a transportation warehousing and logistics business, but acted as a conduit to send investor funds to
12 EtherGalaxy.

13 83. The Foundation and Platform Respondents failed to disclose that the donation fee or service
14 fee must be paid with investors’ personal funds rather than the profits earned in cryptocurrencies.

15 84. The Foundation Respondents and Platform Respondents misrepresented material information
16 related to the companies’ incorporation information, including misrepresenting the Foundation Respondents
17 as nonprofit organizations and fabricating long business histories to earn trust from investors.

18 **Registration Status**

19 85. Zenith Asset Tech Foundation, Quantum Prosperity Consortium Tech Foundation, InnovaTech
20 Foundation, Wealthtutor Corp., Lencoin Tech Corp., Dreamadviser Corp., Fortunebuild Foundation, and
21 Malcoin Tech Corp. are not, and have never been registered to sell their securities in the state of Washington,
22 nor have they filed a claim of exemption from registration.

23

1 registration section of the Securities Act of Washington, by offering and/or selling said securities while not
2 being registered as a securities salesperson or broker-dealer in the state of Washington.

3 4. Respondents Zenith Asset Tech Foundation, Quantum Prosperity Consortium Tech
4 Foundation, InnovaTech Foundation, Wealthtutor Corp., Dreamadviser Corp., and Fortunebuild Foundation
5 violated RCW 21.20.040, the licensee registration section of the Securities Act of Washington, by transacting
6 business as an investment adviser while not being registered or claiming any exemption from registration in
7 the state of Washington.

8 5. Respondents Zenith Asset Tech Foundation, Quantum Prosperity Consortium Tech
9 Foundation, InnovaTech Foundation, Wealthtutor Corp., Dreamadviser Corp., and Fortunebuild Foundation
10 violated RCW 21.20.020 by engaging in an act, practice, or course of business which operated as a fraud or
11 deceit upon investors.

12 6. Respondents Zenith Asset Tech Foundation, Cirkor Inc., Quantum Prosperity Consortium
13 Tech Foundation, Novabit Inc., InnovaTech Foundation, EtherGalaxy Inc., Wealthtutor Corp., Lencoin Tech
14 Corp., Dreamadviser Corp., Opacoin Tech Corp., Fortunebuild Foundation, Malcoin Tech Corp., XR Lily
15 Trading Inc., Blue Star CZY Trading LLC, LPC Wholesales Inc., Innovare Fushion Limited, Airio Inte Ltd,
16 East Rain Transportation Inc., Junxin Qiao, and Rong Fa Trade Inc. violated RCW 21.20.010, the anti-fraud
17 section of the Securities Act of Washington.

18 **NOTICE OF INTENT TO ORDER THE RESPONDENT TO CEASE AND DESIST**

19 Pursuant to RCW 21.20.390(1), and based upon the Tentative Findings of Fact and Conclusions of
20 Law, the Securities Administrator intends to order Respondents Zenith Asset Tech Foundation, Quantum
21 Prosperity Consortium Tech Foundation, InnovaTech Foundation, Wealthtutor Corp., Dreamadviser Corp.,
22 and Fortunebuild Foundation, and their agents and employees, to each permanently cease and desist from
23 violating RCW 21.20.140 and RCW 21.20.020, and Respondents Zenith Asset Tech Foundation, Cirkor Inc.,

1 Quantum Prosperity Consortium Tech Foundation, Novabit Inc., InnovaTech Foundation, EtherGalaxy Inc.,
2 Wealthtutor Corp., Lencoin Tech Corp., Dreamadviser Corp., Opacoin Tech Corp., Fortunebuild Foundation,
3 Malcoinc Tech Corp., XR Lily Trading Inc., Blue Star CZY Trading LLC, LPC Wholesales Inc., Innovare
4 Fusion Limited, Airio Inte Ltd, East Rain Transportation Inc., Junxin Qiao, and Rong Fa Trade Inc. and their
5 agents and employees, to each permanently cease and desist from violating RCW 21.20.040 and RCW
6 21.20.010.

7 **NOTICE OF INTENT TO IMPOSE FINES**

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

10 a. Zenith Asset Tech Foundation and Cirkor Inc. shall be jointly and severally liable for and shall
11 pay a fine of \$280,000;

12 b. Quantum Prosperity Consortium Tech Foundation and Novabit Inc. shall be jointly and
13 severally liable for and shall pay a fine of \$120,000;

14 c. InnovaTech Foundation and EtherGalaxy Inc. shall be jointly and severally liable for and shall
15 pay a fine of \$100,000;

16 d. Wealthtutor Corp. and Lencoin Tech Corp. shall be jointly and severally liable for and shall
17 pay a fine of \$120,000;

18 e. Dreamadviser Corp. and Opacoin Tech Corp. shall be jointly and severally liable for and shall
19 pay a fine of \$80,000;

20 f. Fortunebuild Foundation and Malcoinc Tech Corp. shall be jointly and severally liable for and
21 shall pay a fine of \$120,000;

22 g. XR Lily Trading Inc. shall be liable for and shall pay a fine of \$40,000;

23 h. Blue Star CZY Trading LLC shall be liable for and shall pay a fine of \$20,000;

- 1 i. LPC Wholesales Inc. shall be liable for and shall pay a fine of \$20,000;
- 2 j. Innovare Fusion Limited shall be liable for and shall pay a fine of \$20,000;
- 3 k. Airio Inte Ltd shall be liable for and shall pay a fine of \$20,000;
- 4 l. East Rain Transportation Inc. and Junxin Qiao shall be liable for and shall pay a fine of
5 \$40,000; and
- 6 m. Rong Fa Trade Inc. shall be liable for and shall pay a fine of \$20,000.

7 **NOTICE OF INTENT TO CHARGE COSTS**

8 Pursuant to RCW 21.20.390, and based upon the Tentative Findings of Fact and Conclusions of Law,
9 the Securities Administrator intends to order that Respondents Respondents Zenith Asset Tech Foundation,
10 Cirkor Inc., Quantum Prosperity Consortium Tech Foundation, Novabit Inc., InnovaTech Foundation,
11 EtherGalaxy Inc., Wealthtutor Corp., Lencoin Tech Corp., Dreamadviser Corp., Opacoin Tech Corp.,
12 Fortunebuild Foundation, Malcoin Tech Corp., XR Lily Trading Inc., Blue Star CZY Trading LLC, LPC
13 Wholesales Inc., Innovare Fushion Limited, Airio Inte Ltd, East Rain Transportation Inc., and Rong Fa Trade
14 Inc. shall be jointly and severally liable for and shall pay the costs, fees, and other expenses incurred in the
15 administrative investigation and hearing of this matter, in an amount not less than \$45,000; and that Junxin
16 Qiao shall be liable for and shall pay the costs, fees, and other expenses incurred in the administrative
17 investigation and hearing of this matter, in an amount not less than \$10,000.

18 **AUTHORITY AND PROCEDURE**

19 This Statement of Charges is entered pursuant to the provisions of Chapter 21.20 RCW and is subject
20 to the provisions of Chapter 34.05 RCW. Respondents Respondents Zenith Asset Tech Foundation, Cirkor
21 Inc., Quantum Prosperity Consortium Tech Foundation, Novabit Inc., InnovaTech Foundation, EtherGalaxy
22 Inc., Wealthtutor Corp., Lencoin Tech Corp., Dreamadviser Corp., Opacoin Tech Corp., Fortunebuild
23 Foundation, Malcoin Tech Corp., XR Lily Trading Inc., Blue Star CZY Trading LLC, LPC Wholesales Inc.,

1 Innovare Fushion Limited, Airio Inte Ltd, East Rain Transportation Inc., Junxin Qiao, and Rong Fa Trade Inc.
2 may each make a written request for a hearing as set forth in the Notice of Opportunity for Hearing
3 accompanying this Order. If a respondent does not make a hearing request in the time allowed, the Securities
4 Administrator intends to adopt the above Tentative Findings of Fact and Conclusions of Law as final and to
5 enter a permanent order to cease and desist as to that respondent, to impose any fines sought against that
6 respondent, and to charge any costs sought against that respondent.

7
8 SIGNED and ENTERED this 22 day of April, 2026.



14 /s/

15
16 _____
Faith L. Anderson
Acting Securities Administrator

17 Approved by:

Presented by:

18 /s/

/s/

19 _____
Brian J. Guerard
Chief of Enforcement

20 _____
Qinwei Fan
Financial Legal Examiner

21 Reviewed by:

22 /s/

23 _____
Adam N. Yeaton
Financial Legal Examiner Supervisor