

**BEFORE THE INVESTOR PROTECTION DIRECTOR
FOR THE STATE OF DELAWARE**

Andrew Zahlan,	:	Investor Protection Matter Nos. 21-0137, 22-0119
Redacted	:	
Cho Hui-Chun,	:	
Hao Li,	:	
Hồ Hoài Nam,	:	
Hoang Van Phuc,	:	
Hoang Van Thuy,	:	
Hung Ka Ho,	:	
Li MengYen,	:	
Nguyen Ba Thieu,	:	
Nguyen Thi Huong Cuc,	:	
Nguyen Thi Mai Huong,	:	
Nguyen Thi Phuong,	:	
Nguyen Van Phoung,	:	
Nguyen Van Thach,	:	
Nguyen Van Ton,	:	
Ogu-eke Munachimso Mctony,	:	
Pintu Digital Pte Ltd,	:	
Thuyet Nguyen Duy,	:	
Trinh Duc Luat,	:	
Vo Thanh Dong,	:	
And Does 1- 30,	:	
	:	
Respondents.	:	

SUMMARY ORDER TO CEASE AND DESIST

Based upon a preliminary investigation conducted by the staff of the Investor Protection Unit of the Delaware Department of Justice (the “Unit”), pursuant to Title 6, §73-601(c) of the Delaware Securities Act (the “Act”) and Rule 263 of the Rules Pursuant to the Delaware Securities Act, the Unit has determined that evidence exists to support the entry of this Summary Order to Cease and Desist. This order is believed to be in the best interest of victims identified below, as well as victims not yet identified.

Findings of Fact

1. On November 23, 2021, the Unit received a complaint from a Delaware resident.
2. The complaint indicated that the complainant had met a person online who went by the name of Xi Lin. Xi Lin, who used Jason as an English name, purportedly befriended the complainant to teach her about short-term investments, and recommended that she use cryptocurrency to invest in a specific company, Carrod Securities. The complainant was not informed of any risks and was led to believe that she was making a legitimate investment for which she was likely to receive a return.
3. The complainant followed the advice of Xi Lin and purchased cryptocurrency, which she believed would then be invested with Carrod Securities.
4. Xi Lin's statements were untrue and misleading; when the complainant tried to withdraw the funds, she was informed that the funds were being held until she paid taxes on them.
5. On June 7, 2022, the Unit received a similar complaint from a second Delaware resident. The two complainants are together referred to as the "Delaware Victims."
6. Respondents are persons and entities who may be using aliases and who are, on information and belief, either personally involved, or working in conjunction, with individuals who are contacting people online, including people in Delaware and the Delaware Victims identified above, for purposes of defrauding them by recommending investments using cryptocurrency and then moving the cryptocurrency to accounts unknown to the victims.
7. Inca Digital is a cryptocurrency intelligence company that provides data, analytics, and expertise on cryptocurrency.
8. Through preliminary investigations conducted internally by the Unit, and with Inca Digital acting at the direction of the Unit, it is believed Respondents are part of a larger ongoing scam that uses cryptocurrency and sham companies to fraudulently obtain funds from victims, including the Delaware Victims.
9. These fraudulently obtained funds are being held on cryptocurrency exchanges and by other cryptocurrency financial services providers.
10. Carrod Securities is a sham company used in this ongoing fraudulent activity.
11. Carrod Securities' accounts with cryptocurrency exchanges and cryptocurrency financial services providers contain fraudulently obtained funds.

12. Upon information and belief, these fraudulently obtained funds are now located in various accounts on online cryptocurrency platforms, including but not limited to accounts associated with the following names and email addresses:

	Email Address	Name
1	ngocdiepp2311@gmail.com	<i>*Not Provided*</i>
2	andyrcon@gmail.com	Andrew Zahlan
Redacted		
4	kelly654911@gmail.com	Cho Hui-Chun
5	lihao@capitalmu.com	Hao Li
6	namhh289@gmail.com	Hồ Hoài Nam
7	phuccidv@gmail.com	Hoang Van Phuc
8	hoangthuy86keyboard@gmail.com	Hoang Van Thuy
9	supportleekachiu_ilove86@protonmail.com	Hung Ka Ho
10	plzcooper@pm.me	Li MengYen
11	bathjeu@gmail.com	Nguyen Ba Thieu
12	caunoi999@gmail.com	Nguyen Thi Huong Cuc
13	vanliembkhn@gmail.com	Nguyen Thi Huong Cuc
14	bellaxinh1996@gmail.com	Nguyen Thi Mai Huong
15	aragonrn123@gmail.com	Nguyen Thi Phuong
16	caunoi900@gmail.com	Nguyen Van Phoung
17	nvthach242@gmail.com	Nguyen Van Thach
18	nvton9999@gmail.com	Nguyen Van Ton
19	crysetbox@gmail.com	Ogu-eke Munachimso Mctony
20	pintudigital@pintu.co.id	Pintu Digital Pte Ltd
21	thuyetxuan07@yahoo.com	Thuyet Nguyen Duy
22	tienaogiare.com@gmail.com	Trinh Duc Luat
23	vominhquan191@gmail.com	Vo Thanh Dong

*Associated through shared IP address, Device ID, or Internal Transaction.

13. Inca Digital, at the direction of the Unit, has tracked the fraudulently obtained investments to the accounts referenced above.

Statutory Scheme

14. “The purpose of the Delaware Securities Act is to prevent the public from being victimized by unscrupulous or overreaching broker-dealers, investment advisers or agents in the context of selling securities or giving investment advice, as well as to remedy any harm caused by securities law violations. This prophylactic and remedial purpose shall be deemed of paramount importance in the interpretation of the provisions of this chapter and particularly in any judicial review of sanctions or penalties imposed by the Investor Protection Director and of motions or request by persons affected to stay such sanctions or penalties.” § 73-101(b) of the Act.
15. “Whenever it appears that a person has violated or is about to violate this chapter by ... engaging in fraud or other prohibited conduct, the Director may summarily issue a cease and desist order against that person.” § 73-601(c).
16. The sham purchases by the Delaware Victims using cryptocurrencies are securities within the meaning of § 73-103(a)(23).
17. “It is unlawful for any person, in connection with the offer, sale or purchase of any security, directly or indirectly: ... to make any untrue statement of material fact or to omit to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they are made, not misleading.” §73-201(2).

Conclusions of Law

18. The Respondents falsely presented the investments as legitimate, while encouraging the Delaware Victims to make these fraudulent investments using cryptocurrency. There was never a real investment and there was no intent to return any money.
19. Respondents have thus engaged in fraudulent conduct prohibited by the Act and the Rules promulgated thereunder and as described herein, forming the basis for issuance of this Summary Order to Cease and Desist pursuant to § 73-601 of the Act and Rule 263.

Order to Cease and Desist

WHEREAS, after due deliberation, the Unit finds that it is necessary and appropriate, in the public interest, for the protection of investors, and is consistent with the purposes fairly intended by the policy and provisions of the Delaware Securities Act to issue the following Order:

NOW, THEREFORE, by the authority of §73-601(c) of the Delaware Securities Act and the Rules promulgated thereunder, IT IS ORDERED that:

Respondents, cryptocurrency exchanges, cryptocurrency financial services providers, and every successor, affiliate, control person, agent, servant, and employee of them, and every entity owned, operated, or indirectly or directly controlled or hereinafter organized by or on behalf of them, shall immediately CEASE and DESIST any activity involving funds included in accounts outlined above, as they have a known affiliations with an active investigation.

Respondents, and every successor, affiliate, control person, agent, servant, and employee of them, and every entity owned, operated, or indirectly or directly controlled or hereinafter organized by or on behalf of them, shall immediately CEASE and DESIST from engaging in acts and practices that violate the Delaware Securities Act.

Respondents, and every successor, affiliate, control person, agent, servant, and employee of them, and every entity owned, operated, or indirectly or directly controlled or hereinafter organized by or on behalf of them, shall immediately CEASE and DESIST from engaging in contact with Delaware citizens for purposes of soliciting investments in cryptocurrencies.

Within twenty-five (25) days of receipt of written notification that this Order has been issued, Respondent(s) desiring to have this order vacated or modified may file a written request for a hearing on the matter with the Unit.

Upon receipt of such a written request for a hearing, the matter will be set down for a hearing to commence within fifteen (15) days after receipt of the request, unless the person making such a request consents to a later date.

If no hearing is requested, this Order shall remain in effect until modified or vacated by the Director.

FAILURE TO COMPLY WITH THIS ORDER MAY RESULT IN CRIMINAL PROSECUTION, INJUNCTIVE PROCEEDINGS, CIVIL CONTEMPT PROCEEDINGS (RESULTING IN THE ASSESSMENT OF CIVIL MONETARY PENALTIES) AND, SUBJECT TO THE RIGHT OF HEARING AFFORDED RESPONDENTS UNDER THE DELAWARE SECURITIES ACT, THE IMPOSITION OF ADMINISTRATIVE MONETARY ASSESSMENTS AND STATUTORY BARS.

SO ORDERED this 23rd day of September, 2022.

BY ORDER OF THE DIRECTOR

A handwritten signature in black ink, appearing to read 'JLazar', is written over a horizontal line.

Jillian Lazar
Investor Protection Director
State of Delaware