

**STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION**

IN THE MATTER OF:)	
)	ADMINISTRATIVE ORDER
STAREKCO.COM,)	
Yi Yi, whose identity is otherwise unknown)	
BKYHYO-LTD.COM,)	NO. CD-2024-0001
W D, whose identity is otherwise unknown,)	
LACAPTRADING.COM,)	
Ma Ming, whose identity is otherwise)	
unknown, and One Other)	
Website Purported to be)	
Established by Ma Ming and)	
Identified in Exhibit A to this Order)	
)	
RESPONDENTS)	

CEASE AND DESIST ORDER

The Alabama Securities Commission ("Commission"), having the authority to administer and provide for the enforcement of all provisions of Title 8, Chapter 6, Code of Alabama 1975, the Alabama Securities Act ("Act"), and upon due consideration of the subject matter hereof, has determined as follows:

RESPONDENTS

1. **STAREKCO.COM** ("STAREKCO") is an online entity that purports to be an online crypto currency and forex trading platform. **STAREKCO** was accessible via the website www.starekco.com and may be served through: (1) its domain registrar Namecheap, Inc. located at 4600 East Washington Street, Suite 305, Phoenix, AZ 85034 and via electronic mail at legal@namecheap.com, or (2) via the email address yijsggagh1123@gmail.com, which was provided to Namecheap.com by the purchaser when the domain was purchased.

2. **YI YI** is the owner of **STAREKCO**. **STAREKCO** is a trading website established by **YI YI** which purports to be an online forex, crypto currency trading platform and may be served through: (1) their domain registrar Namecheap, Inc. located at 4600 East Washington Street, Suite

305, Phoenix, AZ 85034 and via electronic mail at legal@namecheap.com, or (2) via the email address yijsggagh1123@gmail.com, which was provided to Namecheap.com by **YI YI**.

3. **BKYHYO-LTD.COM (“BKYHYO”)** is an online entity that purports to be an online crypto currency and forex trading platform. **BKYHYO** was accessible via the website www.bkyhyo-ltd.com and may be served through: (1) its domain registrar Namecheap, Inc. located at 4600 East Washington Street, Suite 305, Phoenix, AZ 85034 and via electronic mail at legal@namecheap.com, or (2) via the email address whd536085@outlook.com, which was provided to Namecheap.com by the purchaser when the domain was purchased.

4. **W D** is the owner of **BKYHYO**. **BKYHYO** is a trading website established by **W D** which purports to be an online forex, crypto currency trading platform and may be served through: (1) their domain registrar Namecheap, Inc. located at 4600 East Washington Street, Suite 305, Phoenix, AZ 85034 and via electronic mail at legal@namecheap.com, or (2) via the email address whd536085@outlook.com, which was provided to Namecheap.com by **W D**.

5. **LACAPTRADING.COM (“LACAPTRADING”)** is an online entity that purports to be an online crypto currency and forex trading platform. **LACAPTRADING** was accessible via the website www.lacaptrading.com and may be served through: (1) its domain registrar Namecheap, Inc. located at 4600 East Washington Street, Suite 305, Phoenix, AZ 85034 and via electronic mail at legal@namecheap.com, or (2) via the email address bifen3333@outlook.com, which was provided to Namecheap.com by the purchaser when the domain was purchased.

6. **Ma Ming** is the owner of **LACAPTRADING**, and three other trading websites identified in Exhibit A to this order. **LACAPTRADING** and the other three websites established by **Ma Ming** purport to be online forex, and crypto currency trading platforms and may be served through: (1) their domain registrar Namecheap, Inc. located at 4600 East Washington Street, Suite 305, Phoenix, AZ 85034 and via electronic mail at legal@namecheap.com, or (2) via the email address whd536085@outlook.com, which was provided to Namecheap.com by **Ma Ming**.

STATEMENT OF FACTS

7. On February 3, 2023, the Alabama Securities Commission (“Commission”) received a complaint from an Alabama resident pertaining to fraudulent investments in forex trading platforms. The Alabama resident detailed in their complaint that they invested \$131,446.21 in **STAREKCO**, **BKYHYO**, and **LACAPTRADING**. The resident advised in their complaint they were guided to invest in these forex trading platforms by a subject named Abby Lin, and a subject identified as the “Account Specialist.” The Alabama resident was advised what trades to make and when to make them by Abby Lin, and Abby Lin advised this information came from an analyst.

8. Through an interview conducted with the Alabama resident, the Commission confirmed the Alabama resident met Abby Lin on WhatsApp in March of 2022. The Alabama resident spoke with Abby Lin almost daily for approximately two weeks after meeting. Through WhatsApp message records provided by the Alabama resident, the Commission learned on April 8, 2022, Abby Lin told the Alabama resident she made \$27,300.00 in “foreign exchange transaction[s],” and that the Alabama resident could do it as well. Abby Lin also told the Alabama resident, “I can teach you.” Abby Lin then directed the Alabama resident to download the Metatrader 5 application to the Alabama resident’s phone, and through a series of screenshots directed the Alabama resident to Roden Global Limited. Abby Lin had the Alabama resident establish a demo account with Roden Global Limited and again using screenshots walked the Alabama resident through conducting a transaction. Abby Lin then stated to the Alabama resident, “I think you can register a real trading account and inject funds, so that you can learn and make money at the same time. I think it will be very helpful for you,” and Abby Lin told the Alabama resident, “Now I’ll ask the account opening specialist for a link to register a real trading account for you.” Abby Lin provided https://user.roden-fx.com/register/email?promo_code=d497188c7c15&promo_type=1&lang=en&is_partner=0 as the link to register for a real account with Roden Global Limited.

9. The Alabama resident did not complete the registration process through this link until May 25, 2022. The Alabama resident was unable to add funds to their account, so Abby Lin then provided the Alabama resident with https://user.starekco.com/register/email?promo_code=118d88d557&promo_type=1&lang=en&is_partner=0 as the link to complete the Alabama resident’s registration. Abby Lin also provided telephone number +447865124908 to the Alabama resident and stated, “Now you can add an

account opening specialist, who will help you increase and withdraw funds.” When the Alabama resident advised Abby Lin how much money the Alabama resident intended to invest Abby Lin stated, “40 dollars? Oh, my God, this is too little.” Abby Lin later told the Alabama resident she (Abby Lin) did not add less than \$10,000.00.

10. WhatsApp conversations provided by the Alabama resident indicate the Alabama resident contacted +447865124908 on May 25, 2023. The Alabama resident attempted to invest \$40 and was advised the minimum amount was \$500.00. The Alabama resident agreed to invest \$500.00 and was then directed to download the crypto.com application to the Alabama resident’s phone. The Alabama resident was then provided screenshots directing the Alabama resident to purchase \$500.00 worth of USD Coin (USDC). The Alabama resident was then directed to send the 500.00 USDC to 0x0bd3285b72628E2D60eC2f28Fe95662B91654b63. Crypto.com froze the transaction stating, “This address was added within 24 hours, for security reasons please wait 24 hours before withdrawing to this address.” The Alabama resident completed the transfer to the provided address on May 26, 2022, and on May 27, 2022, Abby Lin instructed the Alabama resident when and how to conduct a trade. Based on this trade, the Alabama resident made \$86.00 and paid \$10.00 in commissions.

11. On May 30, 2022, the Alabama resident was again instructed by Abby Lin when and how to conduct another trade. This time the Alabama resident was told by Abby Lin the Alabama resident made \$90.00 in profit, while **STAREKCO** showed the Alabama resident made \$176.00 in profit and paid \$20.00 in commissions. After the trade was completed, the Alabama resident contacted the “Account Specialist” on telephone number +447865124908 and requested to add \$4,500.00 to the Alabama resident’s account. The “Account Specialist” provided the Alabama resident with screenshots directing the Alabama resident on how to add funds to the Alabama resident’s account. The Alabama resident sent 4,500.00 USDC to 0x0bd3285b72628E2D60eC2f28Fe95662B91654b63.

12. On May 31, 2022, the Alabama resident again added funds to the Alabama resident’s account with the assistance of the “Account Specialist.” The Alabama resident sent 15,000.00 USDC to 0x0bd3285b72628E2D60eC2f28Fe95662B91654b63.

13. On June 1, 2022, Abby Lin again directed the Alabama resident to conduct a trade. After Abby Lin directed the Alabama resident to conduct the trade the Alabama resident was informed the Alabama resident made \$2,450.00. Later in the conversation on June 1, 2022, Abby Lin stated,

“I want to tell you that the more money, the lower our risk and the higher our profit, which is why I will deposit more money in my trading account. You can do it, [Alabama resident’s name]. Think about it. How long do you have to work to earn the income from a transaction?”

14. On June 7, 2022, the Alabama resident was again directed by Abby Lin to conduct a trade. The Alabama resident at the direction of Abby Lin placed the trade and made \$3,430.00. Abby Lin advised the Alabama resident that she (Abby Lin) made \$39,200.00 on the trade. Abby Lin then stated to the Alabama resident, “The analyst told me a good news, because of the Middle East war, there will be a big market trend for crude oil, but they fluctuate greatly. The analyst suggested that all members should prepare \$100,000 to join the plan.” Abby Lin continued to tell the Alabama resident that Abby Lin believed the Alabama resident could join, and told the Alabama resident, “If you have \$100,000 in your trading account, the income from each transaction is about \$15,000.” Abby Lin and the Alabama resident later had a conversation regarding the Alabama resident selling property or taking out a loan. Abby Lin suggested the Alabama resident get a loan due to it taking too long to sell property, and stated in the WhatsApp conversation, “So you just need to get a loan, add it to your trading account as soon as possible, and get ready for our next transaction.”

15. Between June 7 and June 9, 2022, the Alabama resident obtained a loan for \$75,000.00. On June 9, 2022, with the aid of the “Account Specialist,” the Alabama resident wired the funds to Crypto.com and then purchased 74,700.00 USDC. The “Account Specialist” then had the Alabama resident transfer the 74,700.00 USDC to 0x0bd3285b72628E2D60eC2f28Fe95662B91654b63.

16. On June 10, 2022, Abby Lin again advised the Alabama resident to make a trade and the Alabama resident followed Abby Lin’s instructions. The Alabama resident was then told the Alabama resident made 9,000.00 yuan. Abby Lin directed the Alabama resident to make additional trades between June 10, 2022, and June 15, 2022, all which led to the Alabama resident making a profit. On June 15, 2022, Abby Lin stated, “I talked a lot with analysts these days. He told me that the gold market and crude oil market will be very good next. In order to make the transaction safer, the analyst told me to increase the funds in the trading account next time, and then I could trade two products at the same time. So, I also suggest that you increase the funds in your trading account together.” Abby Lin later informed the Alabama resident that the Alabama resident needed to add \$250,000.00 to the Alabama resident’s account.

17. On June 22, 2022, after trying to obtain additional loans the Alabama resident was able to borrow money from other individuals. The Alabama resident again contacted the “Account Specialist” and was directed to purchase 19,000 USDC through Crypto.com. The Alabama resident was then advised to transfer these funds to 0x0bd3285b72628E2D60eC2f28Fe95662B91654b63. After the Alabama resident completed the transfer, the Alabama resident was told they qualified to be a “senior member.” The Alabama resident was directed by the “Account Specialist” to enter BKYHYO Ltd. into the Metatrader 5 search bar and then log into BKYHYO Ltd., which the Alabama resident did.

18. On June 30, 2022, the Alabama resident asked the “Account Specialist” if the Alabama resident could create a second smaller account. The “Account Specialist” sent the Alabama resident

https://m.bkyhyoltd.com/#/email_reg?promo_code=f6c515273405&promo_type=1&lang=en&is_partner=0 as the link to apply for a second account and on July 4, 2022, the Alabama resident completed the application. The Alabama resident was then guided by the “Account Specialist” to purchase 1,031 USDC on Crypto.com. The “Account Specialist” then had the Alabama resident send the 1,031 USDC to 0x0bd3285b72628E2D60eC2f28Fe95662B91654b63.

19. On July 22, 2022, the Alabama resident contacted the “Account Specialist” and advised the Alabama resident wished to transfer \$5,200.00 to the Alabama resident’s account. The Alabama resident was again walked through transferring funds to the Alabama resident’s account and was advised to transfer 5,200.00 USDC to 0x0bd3285b72628E2D60eC2f28Fe95662B91654b63.

20. On July 27, 2022, the Alabama resident was advised by Abby Lin to make a trade. During the trading process, the Alabama resident was informed through **BKYHYO** that the Alabama resident lost \$208,320.00, which meant the Alabama resident owed \$2,787.05. The Alabama resident reached out to Abby Lin and Abby Lin advised the Alabama resident may have lost funds due to the trading account having insufficient funds to “resist the market fluctuations.” Abby Lin then proceeded in later conversations to tell the Alabama resident to attempt to get additional loans, or mortgage property to friends.

21. On August 5, 2022, the Alabama resident contacted the “Account Specialist” and advised the “Account Specialist” they wished to deposit \$2,800.00. The Alabama resident was

then walked through the steps to deposit the funds into the Alabama resident's account. The Alabama resident sent 2,800.00 USDC to 0x0bd3285b72628E2D60eC2f28Fe95662B91654b63.

22. On September 2, 2022, the Alabama resident sent an additional 4,500.00 USDC to 0x0bd3285b72628E2D60eC2f28Fe95662B91654b63. The Alabama resident then attempted to check the **BKYHYO** platform but was unable to view it, and the application stated it was disconnected in Metatrader 5. The Alabama resident reached out to the "Account Specialist" and the Alabama resident was told the account had to be debugged. The Alabama resident was later told the platform was being upgraded, and on September 7, 2022, the Alabama resident was told the account had been upgraded. The "Account Specialist" then told the Alabama resident to go to <https://crm.lacaptrading.com/index/register?fromuser=75&group=STAND&lang=en> and fill out the personal information.

23. On September 13, 2022, the Alabama resident again reached out to the "Account Specialist" for assistance in adding funds to the Alabama resident's account. The Alabama resident added 1,200 USDC to their account with **LACAPTRADING**.

24. On September 18, 2022, the Alabama resident reached out to the "Account Specialist" requesting assistance with the Alabama resident's account. The "Account Specialist" advised the platform was being upgraded and on September 21, 2022, the Alabama resident was directed to visit <https://user.bkyhyo->

[ltd.com/register/email?promo_code=76007e2e4f84&promo_type=1&lang=en&is_partner=0](https://user.bkyhyo-ltd.com/register/email?promo_code=76007e2e4f84&promo_type=1&lang=en&is_partner=0). The Alabama resident again filled out their personal information and completed the registration process. The Alabama resident was then directed to delete the Metatrader 5 application and told to visit <https://bspkcj.cn/kctnv6> and follow prompts to complete the download.

25. On September 27, 2022, the Alabama resident made the Alabama resident's last deposit. This deposit to the trading account was 2,500.00 USDC bringing the total amount sent to 130,931.00 USDC. The Alabama resident again followed the same steps as previous deposits.

26. On September 30, 2022, the Alabama resident reached out to the "Account Specialist" to withdraw \$500.00 from the Alabama resident's trading account. The Alabama resident was told that the payment system was being updated. On October 6, 2022, the Alabama resident was told to send the "Account Specialist" the Alabama resident's cryptocurrency address. On October 10, 2022, the Alabama resident requested assistance locating the Alabama resident's cryptocurrency address and the "Account Specialist" walked the Alabama resident through locating the Alabama

resident's address in Crypto.com. The Alabama resident then provided the "Account Specialist" the Alabama resident's address and received 500.00 USDT (Tether).

27. After the withdrawal of the 500.00 USDT, the Alabama resident kept the application the Alabama resident had downloaded but did not trade anymore due to believing the Alabama resident was victim of a scam. The Alabama victim had read an article pertaining to individuals who were victims of scams which followed a similar fact pattern to that of the Alabama resident's involvement with the **RESPONDENTS**.

28. The Alabama resident spoke with Abby Lin again in January of 2023. Abby Lin again directed the Alabama resident to the "Account Specialist" and attempted to get the Alabama resident to invest. The Alabama resident did contact the "Account Specialist" on January 19, 2023, and the Alabama resident was told on January 23, 2023, the Alabama resident's account was frozen due to inactivity and required 20% of the account balance be paid to unlock the account. The Alabama resident then asked where the funds should be sent, and the "Account Specialist" provided 0x34648f5677c5450a834cF82156F4bc237C47Febd as the new address to which funds should be sent.

29. After receiving the initial complaint from the Alabama resident, the Commission was able to locate another Alabama resident that had invested with **BKYHYO**. This Alabama resident met a female subject named "Linda" on TikTok and continued to communicate with "Linda" on WhatsApp beginning on July 28, 2021. While communicating through WhatsApp, "Linda" told this Alabama resident that "Linda" utilized MT 5 (Metatrader 5) to invest. "Linda" also told the Alabama resident that the stock market was a bear market, and "Linda" told the Alabama resident that "Linda" would teach the Alabama resident how to invest. "Linda" provided the Alabama resident instructions on how to access the **BKYHYO** application and taught the Alabama resident how to use the application.

30. Furthermore, "Linda" advised the Alabama resident that **BKYHYO** was registered with the National Futures Association (NFA) and was registered with Companies House of United Kingdom.

31. "Linda" provided this second Alabama resident with telephone number +447723127290, and the Alabama resident was to contact this telephone number on WhatsApp for help setting up a **BKYHYO** account. On August 9, 2021, the Alabama resident contacted

+447723127290 utilizing WhatsApp. The Alabama resident was told to go to the “official website of BKYHYO LTD., (www.bkyhyoltd.com),” and was walked through setting up an account.

32. Beginning August 9, 2021, through November 15, 2021, the Alabama resident was provided with the following addresses by +447723127290 to which the Alabama resident sent a total of 192,714.427773 USDT in ten transactions:

- a. 0xA5E6270ef1773a166357bcdF10EE8a58c2FC6d83
- b. 0x67B2deA97767Fe2068bFD01A95Bed60E6FF905Be
- c. 0x1b2c8FFcc1c17D3FA7d6D5Be61Fc12BA08cDEce3
- d. 0x19F0f0909ca40E62B78deFB31956E20293da1790

33. On August 13, 2021, the second Alabama resident was advised by “Linda” to conduct a trade. “Linda” told the Alabama resident how to complete the trade and after the trade was completed “Linda” stated, “My profit this time is 19141 dollars. Many times, more than you. Because I have more principal than yours, I bought 29 shares in this transaction.” “Linda” continued to direct the Alabama resident on trades completed by the Alabama resident from August 15, 2021, through August 18, 2021. On August 18, 2021, “Linda” promoted the idea of the Alabama resident putting additional funds into the Alabama resident’s account so the Alabama resident would have access to a “Broker Mentor.” The Alabama resident and “Linda” also discussed how the “Broker Mentor” would receive 1% commissions on each trade.

34. On August 19, 2021, the Alabama resident provided additional funds to the Alabama resident’s account in order to reach a balance in excess of \$10,000.00. The Alabama resident then requested a “Broker Mentor” from the “Account Specialist.” The Alabama resident was then contacted through WhatsApp by a subject identified as “Jane” who was the Alabama resident’s “Broker Mentor.” “Jane” told the Alabama resident when, what and how much to trade. “Jane” also encouraged the Alabama resident to invest additional funds. “Jane” also confirmed “Jane” was to receive a commission based on the Alabama resident’s trades when “Jane” stated, “I hope you can trade more, the longer the trade, so that I can get more commission. I’m sorry. I’m a little selfish.”

35. On October 25, 2021, the Alabama resident was advised by +447723127290 that the Alabama resident’s account had been frozen due to “buying” and “selling” at the same time. The Alabama resident was told for the account to be unblocked the Alabama resident would have to submit personal identification information and pay 50% of the total amount of the account, which

meant the Alabama resident would have to pay \$54,962.20. On November 1, 2021, the Alabama resident provided 55,469.49 in USDT to have the Alabama resident's account unlocked.

36. On November 2, 2021, the Alabama resident attempted to withdraw funds from the Alabama resident's **BKYHYO** account. The Alabama resident was then told by +447723127290 that the Ethereum address the Alabama resident provided was abnormal. The Alabama resident was then advised that due to the abnormal address, the Alabama resident brought risk to **BKYHYO** and had to pay \$20,000.00 to resolve the issue and if it was not completed within seven days the account would be frozen. The Alabama resident was then advised the Alabama resident could wait to pay the \$20,000.00 until November 15, 2021. On November 15, 2021, the Alabama resident sent 20,246 USDT to **BKYHYO**. Once the funds were sent, the Alabama resident did not receive any additional responses from +447723127290, or "Linda," and received no additional trade instructions from "Jane."

37. The websites were searched in the National Futures Association (NFA) Basic database, and it was determined Roden Global Limited, **STAREKCO**, and **BKYHYO** were registered with NFA but were non-members. As non-members, **STAREKCO** and **BKYHYO** were not subject to NFA oversight. A search for **LACAPTRADING** was conducted and it was determined **LACAPTRADING** was not registered.

38. A search of <https://find-and-update.company-information.service.gov.uk> revealed Roden Global, **STAREKCO**, and **BKYHYO** were registered companies in the United Kingdom.

39. IP addresses obtained from Namecheap, Inc. showed that **YI YI, W D**, and **Ma Ming** logged into their accounts, from Hong Kong, China to conduct transactions, place orders, and create domains.

40. On December 13, 2023, a review of the registration files of the Alabama Securities Commission revealed no registration for the **RESPONDENTS** in any capacity.

41. A review of the Alabama Secretary of State's online database revealed no business filing for the **RESPONDENTS** as domestic or foreign businesses.

CONCLUSIONS OF LAW

42. Pursuant to section 8-6-2(10), Code of Alabama, 1975, the definition of a security includes investment contracts and profit-sharing agreements. The investment plans outlined by **RESPONDENTS** require the investment of money in the investment/forex trading program

managed by **RESPONDENTS**, and the Alabama investor expected profits to be derived from the trading and algorithm of **RESPONDENTS**, and therefore, are securities as defined by the Act.

43. Pursuant to section 8-6-2(5), Code of Alabama, 1975, an Issuer is every person who proposes to issue, has issued, or shall hereafter issue any security. Any person who acts for a compensation or a consideration as a promoter for or on behalf of a corporation, trust, unincorporated association, or partnership of any kind to be formed shall be deemed to be an issuer. **RESPONDENTS** issued a security in the form of an investment contract with the Alabama investor and are an Issuer as defined in the Act.

44. Pursuant to section 8-6-2(18), Code of Alabama, 1975, an Investment Adviser is any person who, for compensation, advises others, either directly or indirectly, as to the value of, or the advisability of investing in securities. The definition includes those who manage portfolios or the accounts of other investors. **RESPONDENTS** provided guidance on when, what and how much to trade along with encouraging further investment with **RESPONDENTS** while receiving a commission; and therefore, are Investment Advisers as defined in the Act.

45. Pursuant to section 8-6-3(a), Code of Alabama, 1975, it is unlawful for any person to transact business in this State as a dealer or agent for securities unless such person is registered under the Act. It is unlawful for any dealer or issuer to employ an agent unless the agent is registered. **RESPONDENTS** employed agents who affected securities transactions for at least one Alabama resident and were not registered as securities dealers or agents in the state of Alabama in violation of the Act.

46. Pursuant to section 8-6-4, Code of Alabama, 1975, it is unlawful for any person to offer or sell any security in this state unless: (1) it is registered under the Act; (2) The security is exempt from registration under Section 8-6-10; or (3) the transaction is exempt under Section 8-6-11. **RESPONDENTS** sold a security as defined under 8-6-2(10), Code of Alabama 1975, while that security was neither exempt nor registered with the state, in violation of the Act.

47. Pursuant to section 8-6-17(a)(1), Code of Alabama, 1975, it is unlawful for any person, in connection with the offer, sale, or purchase of any security, directly or indirectly, to employ any device, scheme, or artifice to defraud. **RESPONDENTS** reported fictitious account values and imposed undisclosed fees in violation of the Act.

This Order is appropriate in the public interest for the protection of investors and is consistent with the purposes of the Act.

This Order does not prevent the Commission from seeking such other civil or criminal remedies that may be available to it under the Alabama Securities Act.

Additionally, if the allegations set forth herein are found to be true, through either administrative adjudication, failure of the **RESPONDENTS** to make a timely request for hearing, or default of the **RESPONDENTS**, it is the intention of the Commission to impose sanctions upon the **RESPONDENTS**. Such sanctions may include, inter alia, an administrative assessment imposed on **RESPONDENTS**, an additional administrative assessment for investigative costs arising from the investigation of the violations described herein against **RESPONDENTS**, and a permanent order to bar **RESPONDENTS** from participation in any securities-related industry in the State of Alabama.

ACCORDINGLY, IT IS HEREBY ORDERED that **RESPONDENTS CEASE AND DESIST** from further offers or sales of any security into, within or from the State of Alabama.

Entered at Montgomery, Alabama, this 8th day of January, 2024.



ALABAMA SECURITIES COMMISSION
445 Dexter Avenue, Suite 12000
Montgomery, AL 36104
(334) 242-2984

BY:

A handwritten signature in blue ink, appearing to read "A. Senn", is written over a horizontal line.

Amanda L. Senn
Director

STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION

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Exhibit A

ctrltld.com