



M E M O R A N D U M

To: Members of the Working Group on Fraudulent Business Filings

From: Chris Beall

Date: October 20, 2022

Re: Analysis of sample data set of one week of entity registrations

At the Working Group's last meeting, we discussed the potential for obtaining a one-week set of business registration filings as a sample for review of the registration practices that the Colorado business registry sees. In that vein, I requested the data set that accompanies this memo. (Attachment A – Business Entities in Colorado, 091822-092422.xls)

This report shows that during that one-week period in mid-September, 3,437 new business entities were registered on the Colorado business registry. A breakdown of those entities is as follows:

- Limited Liability Company – 2,920
- Corporation – 203
- Foreign Limited Liability Company – 123
- Nonprofit Corporation – 79
- Foreign Corporation – 73
- Foreign Nonprofit Corp. – 9
- Corporation-Public Benefit Corp. – 8
- Limited Liability Partnership – 6
- Foreign Other – 5
- Limited Partnership – 3
- Foreign Limited Partnership – 2
- Limited Partnership Association – 2
- Cooperative Association-Public Benefit Corp. – 1
- Foreign Limited Liability Limited Partnership – 1
- Limited Cooperative Association – 1
- Limited Liability Limited Partnership – 1

Total: **3,437**

Thirty-one percent (1,065) of these entities were registered with a business firm listed as the local registered agent, usually either a law firm or a corporate services firm but also sometimes the entity itself. The firms with more than 10 entities for which they served as local registered agents in the sample set were the following:

- Registered Agents/Colorado Registered Agent/Northwest Registered Agent – 237
- CT Corp./National Registered Agents/Cogency Global/Vcorp Services/The Corporation Co./Platinum Filings/Business Filings Inc./ – 95
- Registered Agents – 93
- Legalinc Corporate Services – 73
- United States Corporation Agents – 66
- ZenBusiness – 48
- Corporation Service Co. – 41
- Inc Authority RA – 38
- Universal Registered Agents/First Corporate Solutions/Registered Agent Solutions/InCorp Services/URS Agents – 30
- Cogency Global – 18
- Colorado Registered Agent – 18

Of the sixty-nine percent (2,372) of the entities which listed an individual human being as their local registered agent, only one individual appeared for more than ten entities: Zirun Qi. In general, most of the other individual registered agents appeared to be serving as registered agents for their own businesses or for no more than a few entities.

For the twenty-nine entities that Mr. Qi registered in mid-September as domestic limited liability companies, Mr. Qi listed the same principal address in Atlanta, Georgia: 2310 Parklake Dr NE Ste 477, Atlanta, GA 30345. That location is listed as the principal address for Mr. Qi's Georgia business entity Busineer Corp., which is a Georgia for-profit corporation with Mr. Qi as its CEO.

Mr. Qi registered these twenty-nine entities in groups of 10 on intervening days during the sample week:

- 9/19 (Mon.) – 10
- 9/21 (Wed.) – 10
- 9/23 (Fri.) – 9

The names of these twenty-nine entities were the following: Acme Pane LLC, Ardum Tech LLC, Aspintri LLC, Batch Craft LLC, Bosano Tech LLC, Brawnous LLC, Chamelea LLC, Claston LLC, Criola LLC, Daunt Tech LLC, Eloquent Tech LLC, Ersatile LLC, Gilded Tech LLC, Isthmus Tech LLC, Katabiz LLC, Kneadee LLC, Orbima LLC, Poshskill LLC, Rolleia LLC, Spiro Tech LLC, Sprout Heaven LLC, Sturdy Brick LLC, Talisman Tech LLC, Velocida LLC, Vexation LLC, Walaso Tech LLC, Witty Tech LLC, Zee Wall LLC, and Zevo Soma LLC

A further review of the Colorado business registry shows that Mr. Qi is listed as the local registered agent for a total of 189 Colorado entities. All but one of those entities lists as its principal place of business the address at 6547 N Academy Blvd PMB 1274, Colorado Springs,

CO 80918. That location is a commercial mailbox rental business, and the same mailbox number is listed for all 188 of the businesses that Mr. Qi registered there:



Finally, a check Colorado's voter registration information indicates that Mr. Qi has never been registered to vote in Colorado. Instead, it appears that Mr. Qi, at least as of February 4, 2022, lived at a residence in Gwinnett County, Georgia.

In summary, of the 3,437 entities registered during the sample week in mid-September, I could identify only 29 entities that likely were registered without a local registered agent who maintains a primary residence or a usual place of business in Colorado, as required by § 7-90-701(1)(a), C.R.S. In other words, less than one percent (0.84%) of the entities registered that week appear to lack a legally sufficient local registered agent.¹

¹ My review of the 3,437 entities registered during the sample period was not fully exhaustive. It is possible that there are other registered agents who do not have a primary residence or a usual place of business in Colorado. I simply did not find others during my review.

