#### STATE OF NEVADA OFFICE OF THE SECRETARY OF STATE 2 SECURITIES DIVISION 3 1 STATE OF NEVADA WAY, 3<sup>RD</sup> FLOOR LAS VEGAS, NEVADA 89119 4 5 In the Matter of: 6 CHING YIT LIM, SUSAN SU, individuals; FINAL ORDER TO CEASE AND DESIST and B9 CRYPTO a/k/a COIN 9 7 TECHNOLOGY CO., LTD., File No. <u>INV23-172</u> 8 Respondents. 9 Nevada Secretary Of State 10 Securities Division 11 JUN 05 2025 12

TO: Ching Yit Lim

200-99 Yorkville Avenue Toronto, ON M5R 3K5 Canada

B9 Crypto a/k/a Coin 9 Technology Co., Ltd. 200-99 Yorkville Avenue Toronto, ON M5R 3K5 Canada

WHEREAS, the Securities Division of the Office of the Nevada Secretary of State ("Division") duly served a copy of the Notice of Summary Order to Cease and Desist Pursuant to NRS 90.630 and Opportunity for Hearing Pursuant to NRS 90.630(3) and Summary Order filed on March 26, 2025, upon Ching Yit Lim; and B9 Crypto a/k/a Coin 9 Technology Co., Ltd.;

WHEREAS, Respondents failed to request a hearing within forty-five (45) days after the Summary Order was issued by registered mail to the last known address of Respondents as provided in NRS 90.630.

NOW THEREFORE, the Administrator of the Division, pursuant to the authority set forth in NRS 90.630, the Order to Cease and Desist (a copy of which is attached hereto and incorporated herein by this reference) is hereby final.

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#### IT IS SO ORDERED.

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DATED this day of June, 2025.

Deputy Secretary of State for Securities Securities Administrator

#### **CERTIFICATE OF MAILING**

I certify that I am an employee of the Securities Division of the Office of the Secretary of State, State of Nevada, and that on this day of June, 2025, I have caused a true and correct copy of the foregoing FINAL ORDER TO CEASE AND DESIST to be served by Registered Mail, Return Receipt Requested, and First Class Mail, to the following:

Ching Yit Lim 200-99 Yorkville Avenue Toronto, ON M5R 3K5 Canada

B9 Crypto a/k/a Coin 9 Technology Co., Ltd. 200-99 Yorkville Avenue Toronto, ON M5R 3K5 Canada

Amployee of the Nevada Securities Division

## STATE OF NEVADA

2	OFFICE OF THE SECRETARY OF STATE SECURITIES DIVISION	
3	1 STATE OF NEVADA WAY, 3 <sup>RD</sup> FLOOR LAS VEGAS, NEVADA 89119	
5	In the Matter of:	)
6 7	CHING YIT LIM, SUSAN SU, individuals; and B9 CRYPTO a/k/a COIN 9 TECHNOLOGY CO., LTD.,	) NOTICE OF SUMMARY ORDER TO ) CEASE AND DESIST )
8	Respondents.	) ) File No. <u>INV23-172</u> )
10		, ) )
11		Nevada Secretary Of State Securities Division
12	TO: Ching Yit Lim 200-99 Yorkville Avenue Toronto, ON M5R 3K5 Canada	MAR 25 2025 By: 82 71 7
14	B9 Crypto a/k/a Coin 9 Technolog	
16	200-99 Yorkville Avenue Toronto, ON M5R 3K5	
17	Canada	
18	NOTICE OF SUMMARY ORDER TO CEASE AND DESIST, INTENDED ACTION PURSUANT TO NRS 90.630(2),	
19	AND OPPORTUNITY FOR HEARING PURSUANT TO NRS 90.630(3)	
20	Administrator of the Securities Division of the O	pursuant to the legal authority granted to the
Z I	i multilitation of the occurres division of the U	THE OF THE SECRETARY OF STATE. STATE Of Nevada

Administrator of the Securities Division of the Office of the Secretary of State, State of Nevada ("Administrator"), specifically Nevada Revised Statute ("NRS") 90.630, the Administrator hereby sends notice of this COMPLAINT FOR SUMMARY ORDER TO CEASE AND DESIST to CHING YIT LIM an individual, and B9 CRYPTO a/k/a COIN 9 TECHNOLOGY CO., LTD.

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YOU ARE HEREBY FURTHER NOTIFIED that you have a right to request a hearing on the matters set forth in the Summary Order to Cease and Desist. If you do not request a hearing in writing within 45 days after receipt of this notice, you waive your right to a hearing and the Administrator may issue a permanent order. Should you request a hearing, the Administrator shall

set the matter for hearing at her earliest convenience but not less than 15 days or more than 60 days after she receives written notice of that request for a hearing. Should you request a hearing, the Administrator will notify you by registered or certified mail of the time and place set for the hearing.

YOU ARE HEREBY FURTHER NOTIFIED that the Securities Division, in addition to seeking a Final Order to Cease and Desist, may also seek any of the sanctions allowed pursuant to NRS 90.630, and may seek to hold Respondents liable for the costs of the investigation in this matter if this matter should proceed to hearing. The Nevada Securities Division does not waive the right to seek criminal prosecution pursuant to 90.650.

#### YOU ARE HEREBY FURTHER NOTIFIED:

#### NRS 90.650, Criminal penalties.

- I. A person who willfully violates:
  - (a) A provision of this chapter, except NRS 90.600, or who violates NRS 90.600 knowing that the statement made is false or misleading in any material respect;
  - (b) A regulation adopted pursuant to this chapter; or
  - (c) An order denying, suspending or revoking the effectiveness of registration or an order to cease and desist issued by the Administrator pursuant to this chapter, is guilty of a category B felony and shall be punished by imprisonment in the state prison for a minimum term of not less than I year and a maximum term of not more than 20 years, or by a fine of not more than \$500,000, or by both fine and imprisonment, for each violation. In addition to any other penalty, the court shall order the person to pay restitution and may order the person to repay the costs of investigation and prosecution incurred by the Division and the Office of the Attorney General. If the violation was committed against an older person or vulnerable person, any restitution and costs of investigation and prosecution imposed by the court must be in an amount equal to twice the amount that would otherwise have been imposed by the court. Money recovered for reimbursement of the costs of investigation and prosecution must be deposited in the State General Fund for credit to the Secretary of State's Operating General Fund Budget Account.
- 2. A person convicted of violating a regulation or order under this chapter may be fined, but must not be imprisoned, if the person proves lack of knowledge of the regulation or order.
- 3. This chapter does not limit the power of the State to punish a person for conduct which constitutes a crime under other law.

#### **CERTIFICATE OF MAILING**

I certify that I am an employee of the Securities Division of the Office of the Secretary of State, State of Nevada, and that on this day of March, 2025, I have caused a true and correct copy of the foregoing Notice of Summary Order to Cease and Desist to be served by United States Certified Mail, Return Receipt Requested, and First Class Mail, to the following:

Ching Yit Lim 200-99 Yorkville Avenue Toronto, ON M5R 3K5 Canada

B9 Crypto a/k/a Coin 9 Technology Co., Ltd. 200-99 Yorkville Avenue Toronto, ON M5R 3K5 Canada

imployee of the Nevada Securities Division

# STATE OF NEVADA OFFICE OF THE SECRETARY OF STATE SECURITIES DIVISION

2	SECURITIES DIVISION	
3	1 STATE OF NEVADA WAY, 3 <sup>RO</sup> FLOOR	
5	In the Matter of:	
6	CHING YIT LIM, SUSAN SU, individuals; ) COMPLAINT FOR SUMMARY ORDER	
7	and B9 CRYPTO a/k/a COIN 9  Output  Ou	
8	) RELIEF Respondents. )	
9	) File No. <u>INV23-172</u>	
10		
11	TO: Ching Yit Lim Nevada Secretary Of State	
12	200-99 Yorkville Avenue Securities Division	
13	Toronto, ON M5R 3K5 Canada MAR 25-3025	
14	B9 Crypto a/k/a Coin 9 Technology Co., Ltd. By	
15	200-99 Yorkville Avenue Toronto, ON M5R 3K5	
16	Canada	
7	COMPLAINT FOR SUMMARY ORDER AND FINAL ORDER	
8	TO CEASE AND DESIST AND OTHER APPROPRIATE RELIEF	
9	COMES NOW, the Securities Division of the Office of the Secretary of State, State of Nevada	
0.	("Division"), and for its complaint against the above-named Respondents for violations of the Nevada	
1	Uniform Securities Act, as codified in Chapter 90 of the Nevada Revised Statutes, alleges on	
2	information and belief unless otherwise set forth, as follows:	
3	<u>PARTIES</u>	
4	1. Respondent Ching Yit Lim ("Lim"), is an individual who, upon information and belief	
5	is a resident of Ontario, Canada.	

Respondent Susan Su ("Su"), is an individual the Division has no knowledge of her

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actual whereabouts.

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- 3. Respondent B9 Crypto a/k/a Coin 9 Technology Co., Ltd. ("B9") is a Canada incorporated business (785474107RC0001) that operates an online cryptocurrency trading platform which upon information and belief is based out of Canada.
  - 4. B9 has no physical presence, no active business licenses, or any d/b/a's in Nevada.
- 5. According to Division records, none of the Respondents have been licensed with the Division as a sales representative of a broker-dealer, investment adviser or issuer.

#### **FACTUAL BACKGROUND**

- 6. B9 has operated the following domain names in Nevada:
  - a. https://b9.com/
- 7. B9's website states that it is "[T]he safest and most efficient digital wealth platform" with the capability to instantly trade hundreds of digital assets such as Bitcoin and Ethereum. B9's website further features investment products offering "flexible term, stable return, high return, no risk."
- 8. Upon information and belief, B9 solicits investors through the use of social media profiles claiming to be successful investors in the cryptocurrency industry.
- 9. In June 2023, Respondent Su made an introduction between an Unnamed Nevada Investor ("UI") and an unknown individual who stated she was Respondent Su's aunt ("SA"), According to UI, SA presented herself as a "Brokerage Manager of Binance" and began to ask the investor about their financial and liquidity positioning and explained what services B9 could provide.
- 10. In late June 2023, SA and Respondent Su assisted UI in the creation and funding of a B9 trading account. SA conducted trading session with UI, wherein SA instructed UI on how to deposit funds, and set up and execute trades.
- 11. Upon information and belief, cryptocurrency returns generated on the B9 platform are presented to investors through screenshots by Respondents. Further, investors have limited access to facilitate any transaction and initiate withdrawals.
- 12. SA provided UI screenshots of the trades made on UI's behalf that showed a return on UI's investments.

- 13. In early July 2023, UI was notified that his B9 trading account was locked. SA informed UI that this was due to a required verification of funds and stated that UI needed to deposit more funds before he would be able to withdraw the principal value in his account.
- 14. Once UI completed the verification, his account went through additional scrutiny and was refrozen due to additional requirements set by B9, requiring additional deposits into UI's B9 trading account.
- 15. In August 2023, B9 requested additional funds from UI. If not received, UI's account would be permanently frozen and closed.
- 16. B9 has since ceased all communication with UI. As of the date of this Complaint, UI has not received the requested return of his monies from B9, Su or SA.
- 17. According to records maintained by the Division, Respondent Su has never been licensed with the Division as a sales representative of a broker/dealer or issuer. Upon information and belief, Su did not disclose this fact to UI.
- 18. According to records maintained by the Division, B9 has never filed an application for the registration of securities, nor filed a notice of exemption from registration with the Division. Respondents did not disclose this fact to either the unnamed investor or other investors who may have been solicited.

#### STATUTORY BACKGROUND

- 19. The Nevada Uniform Securities Act ("Act"), as codified in Chapter 90 of the Nevada Revised Statutes ("NRS") and regulates the offer, sale, and purchase of securities in or from the State of Nevada.
- 20. NRS 90.285 defines "sale representative" as "a natural person other than a broker-dealer, authorized to act and acting for a broker-dealer or issuer effecting or attempting to effect purchase or sales of securities."
  - 21. NRS 90.295 defines a "security" as:
    - [A] note, stock, bond, debenture, evidence of indebtedness, certificate of interest or participation in a profit-sharing agreement, a limited partnership interest, an interest in a limited-liability company, collateral-trust certificate, preorganization certificate or subscription,

transferable share, investment contract, viatical settlement investment, voting-trust certificate, certificate of deposit for a security, fractional undivided interest in an oil, gas or other mineral lease or in payments out of production of such a lease, right or royalty, a put, call, straddle or option on a security, certificate of deposit or group or index of securities including any interest therein or based on the value of any of the foregoing, or, in general, any interest or instrument commonly known as a security or any certificate of interest or participation in, temporary or interim certificate for, receipt for, whole or partial guarantee of or warrant or right to subscribe to or purchase any of the foregoing.

- 22. As set forth in NRS 90.310, it is a violation of the Act for any person to act as a broker dealer or sales representative unless licensed or exempt from licensing under the Act; additionally, it is a violation of the Act for any issuer or any licensed broker-dealer to employ or contract with a sale representative unless the sales representative is licensed or exempt from licensing under the Act.
- 23. As set forth in NRS 90.460, it is a violation of the Act for a person to offer to sell or sell any security in this State unless the security is registered or the security or transaction is exempt under the Act.
- 24. As set forth in NRS 90.550, the Administrator by order may deny or revoke an exemption specified in NRS 90.520 or 90.530, with respect to a specific security or transaction.
- 25. As set forth in NRS 90.570, in connection with the offer to sell, sale, offer to purchase or purchase of a security, a person shall not, directly or indirectly, employ any device, scheme or artifice to defraud; make an untrue statement of a material fact or omit to state a material fact necessary in order to make the statements made not misleading in the light of the circumstances under which they are made; or engage in an act, practice or course of business which operates or would operate as a fraud or deceit upon a person.
- 26. As set forth in NRS 90.630(1), if the Administrator of the Division reasonably believes that a security is being offered or has been offered or sold in violation of the Act, or that a person is acting in violation of the Act, the Administrator may issue, without a prior hearing, a Summary Order against the person engaged in the prohibited activities, directing such person to desist and refrain from further activity until the security is registered or such person is licensed under the Act.

27. Pursuant to NRS 90.630(2), the Administrator of the Division, after giving notice by registered certified mail and conducting a hearing in an administrative proceeding, unless the right to notice and hearing is waived by the person against whom the sanction is imposed, may: (a) issue an order against the person to cease and desist; (b) censure the person if he or she is a licensed broker-dealer, sales representative, investment adviser or representative of an investment adviser; (c) bar or suspend the person from association with a licensed broker-dealer or investment adviser in this State; (d) issue an order against an applicant, licensed person or other person who willfully violates this chapter, imposing a civil penalty of not more than \$25,000 for each violation, or if the violation was committed against an older person or vulnerable person, a civil penalty equal to twice the amount of the civil penalty that would otherwise have been imposed pursuant to this paragraph, not to exceed \$50,000 for each violation; or (e) initiate one or more of the actions specified in NRS 90.640.

#### COUNT I (Unlicensed Sales Representative)

- 28. The Division realleges and incorporates by reference paragraphs 1 through 29 above as if set forth fully herein.
  - 29. Respondent Su is not licensed as a sales representative with the Division.
- 30. Respondent Su, by engaging in the conduct above, has violated and continues to violate NRS 90.310 by acting as a sales representative without being licensed by the Division.

#### COUNT II (Offer or Sale of Unregistered Securities)

- 31. The Division realleges and incorporates by reference paragraphs 1 through 35 above as if set forth fully herein.
- 32. Respondents have not filed an application for the registration of securities or a notice of exemption from registration with the Division for the sale of securities as described supra.
- 33. Respondents have violated and continue to violate NRS 90.460 by offering to sell and selling securities that are not registered with the Division, are not exempt from registration with the Division, and/or are not federally-covered securities.

### COUNT III (Operating as a Deceit Upon a Person)

- 34. The Division realleges and incorporates by reference paragraphs 1 through 38 above as if set forth fully herein.
- 35. Respondents by engaging in the conduct set forth above, have employed a device, scheme, or artifice to defraud by engaging in the offer or unregistered, non-exempt securities that are not federally-covered securities.
- 36. Respondents have violated and continue to violate NRS 90.570 by engaging directly or indirectly in an act, practice, or course of business that operates or would operate as a deceit upon a person.

#### REQUEST FOR RELIEF

Based upon the foregoing, the Division respectfully requests the following:

- 1. That a Summary Order be entered requiring that the Respondents immediately Cease and Desist from violating the Act;
- 2. That a Final Order be entered requiring that the Respondents immediately Cease and Desist from violating the Act;
- 3. That a Civil Penalty not to exceed \$25,000.00 be imposed against the Respondents for each violation of the Act;
- 4. That a Civil Penalty not to exceed \$50,000.00 be imposed against the Respondents for each violation of the Act against an older person or a vulnerable person;
- 5. That the exemptions from registration set forth in NRS 90.530 be revoked for any note, evidence of indebtedness, investment contract or other security issued by Ching Yit Lim individually and doing business as B9 Crypto a/k/a Coin 9 Technology Co., Ltd. and/or sold by any Respondent.
  - 6. Reasonable attorney's fees and costs of investigation; and
  - 7. For such other and further relief as the Hearing Officer deems just and proper.

    Dated this 25<sup>th</sup> day of March, 2025

Respectfully submitted,

### NEVADA SECURITIES DIVISION OFFICE OF THE SECRETARY OF STATE

Shady Sirsy, Esq. Chief of Enforcement

Secretary of State, Securities Division

#### **CERTIFICATE OF MAILING**

I certify that I am an employee of the Securities Division of the Office of the Secretary of State, State of Nevada, and that on this zonday of March, 2025 I have caused a true and correct copy of the foregoing Complaint for Summary and Final Order to Cease and Desist and Other Appropriate Relief to be served by United States Certified Mail, Return Receipt Requested, and First Class Mail, to the following:

Ching Yit Lim 200-99 Yorkville Avenue Toronto, ON M5R 3K5 Canada

B9 Crypto a/k/a Coin 9 Technology Co., Ltd. 200-99 Yorkville Avenue Toronto, ON MSR 3K5 Canada

Employee of the Nevada Securities Division

SECRETARY OF STATE
Securities Division
I State of Nevada Way 3rd Floor
Las Vegas, NV 89119



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