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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

- v. -

$30,619.27 IN UNITED STATES CURRENCY FORMERLY ON DEPOSIT IN INTERACTIVE BROKERS LLC ACCOUNT NUMBER U13270608 HELD IN THE NAME OF LING ZHANG;

$1,755,148.73 IN UNITED STATES CURRENCY FORMERLY ON DEPOSIT IN INTERACTIVE BROKERS LLC ACCOUNT NUMBER U13786978 HELD IN THE NAME OF JIALIN ZHANG;

$427,628.20 IN UNITED STATES CURRENCY FORMERLY ON DEPOSIT IN INTERACTIVE BROKERS LLC ACCOUNT NUMBER U13787253 HELD IN THE NAME OF ANNA FU;

$30,661.05 IN UNITED STATES CURRENCY FORMERLY ON DEPOSIT IN INTERACTIVE BROKERS LLC ACCOUNT NUMBER U13895181 HELD IN THE NAME OF HUA ZHANG;

$1,160,658.67 IN UNITED STATES CURRENCY FORMERLY ON DEPOSIT IN INTERACTIVE BROKERS LLC ACCOUNT NUMBER U15527285 HELD IN THE NAME OF JIANWEI LI;

$1,164,051.26 IN UNITED STATES CURRENCY FORMERLY ON DEPOSIT IN INTERACTIVE

VERIFIED CIVIL COMPLAINT FOR <u>FORFEITURE</u>

26 Civ. 5543

BROKERS LLC ACCOUNT NUMBER U15692398 HELD IN THE NAME OF SHAOYAN HUANG;

$3,040.30 IN UNITED STATES CURRENCY FORMERLY ON DEPOSIT IN INTERACTIVE BROKERS LLC ACCOUNT NUMBER U15923821 HELD IN THE NAME OF LIAN WU;

$485,963.70 IN UNITED STATES CURRENCY FORMERLY ON DEPOSIT IN INTERACTIVE BROKERS LLC ACCOUNT NUMBER U16282676 HELD IN THE NAME OF MING SHAN;

$1,266,774.99 IN UNITED STATES CURRENCY FORMERLY ON DEPOSIT IN INTERACTIVE BROKERS HONG KONG ACCOUNT NUMBER U16295386 HELD IN THE NAME OF NGAI SING WONG; and

$3,947,313.45 IN UNITED STATES CURRENCY FORMERLY ON DEPOSIT IN INTERACTIVE BROKERS HONG KONG ACCOUNT NUMBER U19832813 HELD IN THE NAME OF YUANBIN ZOU;

Defendants-*in-rem*.

Plaintiff United States of America, by its attorney, Jay Clayton, United States Attorney for the Southern District of New York, for its verified civil complaint, alleges, upon information and belief, as follows:

I. JURISDICTION AND VENUE

1. This is a civil action *in rem* commenced by the United States of America pursuant to Title 18, United States Code, Sections 981(a)(1)(A) and (C), seeking to forfeit the following accounts:

a. $30,619.27 in United States currency formerly on deposit in Interactive Brokers LLC Account Number U13270608 held in the name of Ling Zhang ("Subject Account-1");

b. $1,755,148.73 in United States currency formerly on deposit in Interactive Brokers LLC Account Number U13786978 held in the name of Jialin Zhang ("Subject Account-2");

c. $427,628.20 in United States currency formerly on deposit in Interactive Brokers LLC Account Number U13787253 held in the name of Anna Fu ("Subject Account-3");

d. $30,661.05 in United States currency formerly on deposit in Interactive Brokers LLC Account Number U13895181 held in the name of Hua Zhang ("Subject Account-4");

e. $1,160,658.67 in United States currency formerly on deposit in Interactive Brokers LLC Account Number U15527285 held in the name of Jianwei Li ("Subject Account-5");

f. $1,164,051.26 in United States currency formerly on deposit in Interactive Brokers LLC Account Number U15692398 held in the name of Shaoyan Huang ("Subject Account-6");

g. $3,040.30 in United States currency formerly on deposit in Interactive Brokers LLC Account Number U15923821 held in the name of Lian Wu ("Subject Account-7");

h. $485,963.70 in United States currency formerly on deposit in Interactive Brokers LLC Account Number U16282676 held in the name of Ming Shan ("Subject Account-8");

i. $1,266,774.99 in United States currency formerly on deposit in Interactive Brokers Hong Kong Account Number U16295386 held in the name of Ngai Sing Wong ("Subject Account-9"); and

j. $3,947,313.45 in United States currency formerly on deposit in Interactive Brokers Hong Kong Account Number U19832813 held in the name of Yuanbin Zou ("Subject Account-10")

(Subject Account-1 through Subject Account-10, collectively, the "Defendants-*in-rem*").

2. This Court has original jurisdiction over this forfeiture action pursuant to Title 28, United States Code, Sections 1345 and 1355.

3. Venue is proper pursuant to Title 28, United States Code, Section 1395 because the Defendants-*in-rem* is currently held in the Seized Asset Deposit Fund Account of the

United States Marshals Service (the "USMS") located within the judicial district for the Southern District of New York. Venue is also proper pursuant to Title 28, United States Code, Section 1355 (b)(1)(A) because the acts and omissions giving rise to the forfeiture took place in the Southern District of New York.

4. As set forth below, there is cause to believe that the Defendants-*in-rem* are subject to forfeiture pursuant to (a) Title 18, United States Code, 981(a)(1)(C), as property constituting or derived from proceeds traceable to (i) wire fraud, in violation of Title 18, United States Code, Section 1343; and (ii) securities fraud, in violation of Title 15, United States Code, Sections 78j(b) & 78ff; Title 17 Code of Federal Regulations, Section 240.10b-5; and (b) Title 18, United States Code, Section 981(a)(1)(A), as property involved in money laundering, in violation of Title 1956 and 1957 (money laundering) (collectively, the "Subject Offenses").

II. BASIS FOR FORFEITURE

5. This action arises out of an investigation conducted by the Federal Bureau of Investigation ("FBI") into CTRL Group Limited ("CTRL Group"), a British Virgin Islands-registered holding company based in Hong Kong. CTRL Group purports to provide integrated marketing and advertising services and specializes in "mobile games promotions" in the Hong Kong market through its wholly-owned subsidiary, CTRL Media Limited.

6. On January 22, 2025, CTRL Group filed a prospectus with the SEC announcing an initial public offering ("IPO") of 2,000,000 ordinary shares of CTRL Group, and an additional 1,750,000 ordinary shares to be resold by certain existing shareholders, at a public

offering price of $4.00 per share. CTRL Group's ordinary shares were approved to be listed on Nasdaq under the symbol "MCTR."[1]

7. CTRL Group's IPO closed on January 23, 2025, and was fully subscribed. On January 25, 2025, the underwriters of the IPO exercised an option to purchase an additional 300,000 "over-allotment" shares, which purchase closed on January 27, 2025. The 2,000,000 share IPO, the underwriter's purchase of 300,000 over-allotment shares, and the public resale by existing shareholders of 1,750,000 shares accounted for approximately 26.5% of the 15,300,000 total shares issued and outstanding by CTRL Group.

8. On January 22, 2025, the first day CTRL Group's shares publicly traded on Nasdaq, the stock closed at $4.44 per share with approximately 2,400,000 shares traded. The following day, MCTR closed at $6.79 per share with approximately 8,900,000 shares traded.

9. Between January 24, 2025 and March 13, 2025, the closing stock price for MCTR fluctuated between a low of $4.00 per share and a high of $7.00 per share, with similar daily low and high prices. During that same time period, MCTR experienced relatively low trading volume, with an average of approximately 103,000 shares trading each day.

10. On March 14, 2025, CTRL Group filed a Form 6-K with the SEC in which it disclosed its financial results for the six-month period between March 31, 2024 and September 30, 2024, including a cash and cash equivalent balance of $378,575, unaudited revenue of $2,266,865 and unaudited net income of $103,676. That day, MCTR closed at $7.77 per share (an increase of 10.88% compared to the prior day), with an intra-day high of $8.60 per share (an

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[1] On July 21, 2025, CTRL Group changed its name to TJGC Group Limited and on December 10, 2025, CTRL Group's symbol changed from MCTR to TJGC. Because the events at issue took place before these name changes, this Affidavit refers to the company as CTRL Group and the symbol as MCTR.

increase of 16.37% compared to the prior day), and approximately 189,000 shares trading throughout the day (an increase of 11.37% compared to the prior day).

11. Between March 14, 2025 and July 18, 2025, CTRL Group did not make any further public disclosures.

12. Between March 15, 2025 and June 2, 2025, MCTR experienced relatively minor volatility and trading activity, with a closing low price of $4.72 per share and a closing high price of $8.25 per share, similar intra-day high and low prices, a daily low of zero shares traded and a daily high of approximately 113,000 shares traded, with an average throughout the time period of approximately 17,000 shares traded per day.

13. In late May and early June 2025, various social media accounts on X and Reddit, among other platforms, began to post hundreds of identical comments touting MCTR as a stock that was going to increase in value. For instance, these users would make a post saying "$MCTR Here We Go" or "$MCTR New alerts have been posted in the last hours," followed by a link to a Discord group chat that purported to offer investment advice. Other users would post about similar group chats on WhatsApp and touted that they recommended their followers purchase MCTR earlier that day and it was already up 353%. Some example screenshots of these coordinated social media promotions of MCTR are below:

Diane Christensen @EVAJONE38478931 · May 31
$SMCTR Here We Go:- discord.gg/PKTT2aPaHB
4

JIEARING @jiearing11526 · May 31
$SMCTR Here we go 📊 discord.gg/UE3wWXTszQ
3

Cecelia Osborne @ELISARO34833753 · May 31
$SMCTR New alerts have been posted in the Last hours- discord.gg/PeqwXj5jPX
4

Chris Jones @CHRISJO79766015 · May 31
$SMCTR New alerts have been posted in the Last hours- discord.gg/PeqwXj5jPX
5

Brittany Hansen @Brittan48189818 · May 31
$SMCTR New alerts have been posted in the last hours:- discord.gg/gAgNaHpHvH
4

Hudson Claxton @HClaxton77385 · May 31
$mctr Here we go 📊 💲 ➡️ discord.com/invite/GZ3Xc87...
7

Price Pro @Signal_Trader08 · Jun 1
$mctr Here we go. 💰🎯💯 discord.com/invite/GZ3Xc87...
6

Riley Tierney @RileyT10515 · Jun 1
$mctr Here we go. 💰🎯💯 discord.com/invite/GZ3Xc87...
11

JIEARING @jiearing11526 · Jun 1
$SMCTR Here we go 📊 discord.gg/UE3wWXTszQ
3

Brittany Hansen @Brittan48189818 · Jun 1
$SMCTR New alerts have been posted in the last hours:- discord.gg/gAgNaHpHvH
4

Hudson Claxton @HClaxton77385 · May 31
$mctr Here we go... 📊 ➡️ discord.com/invite/GZ3Xc87...
6

Brittany Hansen @Brittan48189818 · May 31
$SMCTR New alerts have been posted in the last hours:-... discord.gg/gAgNaHpHvH
6

Brittany Hansen @Brittan48189818 · May 31
$SMCTR New alerts have been posted in the last hours:-.. discord.gg/gAgNaHpHvH
5

Clyde
@marohaalhob1

Hi everyone, I shared my purchase of $MCTR on WhatsApp yesterday.

Now it has risen to $22.2, a 353% increase.

I will share more detailed analysis and trading strategies in my WhatsApp group.

Welcome to join my private WhatsApp group

MCTR
CTRL Group Limited · NASDAQ
Electronic Technology · Electronic Equipment/Instruments
22.20 USD +17.30 +353.07%
Market open

2:19 PM · Jun 3, 2025 · **1,284** Views

1 1 9

Jonathan
@minds_macro

I recommended $MCTR in a WhatsApp discussion this morning and it has already gone up 353%.

Fans who bought $MCTR please join my WhatsApp.

I provide stock analysis and trading guidance on WhatsApp.

Join my WhatsApp group to get the latest news

MCTR
CTRL Group Limited · NASDAQ
Electronic Technology · Electronic Equipment/Instruments
22.20 USD
+17.30 +353.07%

2:23 PM · Jun 3, 2025 · **539** Views

14. On June 3, 2025, MCTR experienced a sudden surge in stock price and trading volume. MCTR opened the prior day at $4.73 per share, closed the day at approximately $4.90 per share, experienced an intra-day low of $4.55 per share and an intra-day high of $5.00 per share, with approximately 63,000 shares trading that day. On June 3, MCTR opened at $7.12 per share (an increase of 50.53% compared to the prior day), experienced an intra-day high of $33.69 per share (an increase of 573.8% compared to the prior day), and closed at $32.90 per share (an increase of 571.43% compared to the prior day), with approximately 44,200,000 shares trading that day (an increase of 70,059% compared to the prior day). CTRL Group did not publish any news that would account for the sudden and drastic change in stock price. The surge in MCTR's price and volume was accompanied by a surge in social media activity promoting MCTR.

15. On June 4, 2025, the surge in MCTR's price continued. MCTR opened at $38.52 per share, experienced an intra-day high of $54.91 per share, and closed at $15.40 per share, with approximately 17,800,000 shares trading that day. CTRL Group did not publish any news that would account for the sudden and drastic change in stock price.

16. On June 5, 2025, MCTR's volatility continued. MCTR opened at $20.97 per share, with an intra-day high of $21.59, and closed at $7.40 per share, with approximately 16,400,000 shares trading that day. CTRL Group did not publish any news that would account for the sudden and drastic change in stock price.

17. On June 6, 2025, MCTR's pricing stabilized, opening at $6.40 per share, experiencing an intra-day high of $6.75 per share and an intra-day low of $5.36 per share, and closing at $5.76 per share, in line with MCTR's historical pricing before June 2, 2025. By the end of June 2025, MCTR's stock price had declined to $2.82 per share. Similarly, the surge of social media promotion ceased.

18. As of March 23, 2026, MCTR's stock price fell to $0.50 per share, with relatively little daily trading volume.

Subject Account-1

19. Subject Account-1 was opened on February 6, 2025 under the name Ling Zhang, with a residential address in Guangdong Province, China.

20. Between February 26 and March 10, 2025, Subject Account-1 purchased 100,928 shares of MCTR for $548,814.07, at an average price of $5.44 per share. 100 additional shares were purchased and sold on March 10, 2025.

21. On June 5, 2025, during the period of market manipulation described above, Subject Account-1 sold all 100,928 shares of MCTR at an average price of $7.67 per share, earning proceeds of $774,137.35 and net profits of $225,323.28.

22. On June 10, 2025, Subject Account-1 initiated a disbursement for $822,369. That same day, the funds were sent via wire transfer to an account at a Hong Kong bank with Ling Zhang, listed as the beneficiary.

23. MCTR was the only stock purchased or sold in Subject Account-1 in 2025.

Subject Account-2

24. Subject Account-2 was opened on October 29, 2024 under the name Jialin Zhang, with a residential address in Guangdong Province, China.

25. Beginning on January 22, 2025, the day of CTRL Group's IPO, and ending on March 7, 2025, Subject Account-2 purchased 123,367 shares of MCTR for $539,299.88, at an average price of $4.37 per share.

26. Between February 26 and March 6, 2025, Subject Account-2 sold 16,270 shares of MCTR at an average price of $5.06 per share, earning proceeds of $81,402.50 and net

profits of approximately $14,280.84 calculated using First-In, First-Out ("FIFO") methodology.[2] Between June 3 and 5, 2025, during the period of market manipulation described above, Subject Account-2 sold all remaining 107,097 shares of MCTR at an average price of $11.30 per share, earning proceeds of $2,019,492.39 and net profits of approximately $1,547,314.17 calculated using FIFO methodology.

27. On June 10, 2025, Subject Account-2 initiated a disbursement for $3,000,000. The next day, funds were sent via wire transfer to an account at a Chinese bank with Jialin Zhang, the owner of Subject Account-2, listed as the beneficiary.

28. MCTR was the only microcap stock purchased or sold in Subject Account-2 in 2025.

Subject Account-3

29. Subject Account-3 was opened on October 29, 2024 under the name Anna Fu, with a residential address in Guangdong Province, China.

30. Beginning on January 22, 2025, the day of CTRL Group's IPO, and ending on March 11, 2025, Subject Account-3 purchased 123,059 shares of MCTR for $542,617.29, at an average price of $4.61 per share.

31. Between January 23 and March 11, 2025, Subject Account-3 sold 115,993 shares of MCTR at an average price of $5.01 per share, earning proceeds of $604,639.98 and net profits of approximately $98,913.48 calculated using FIFO methodology.

32. Between June 4 and 5, 2025, during the period of market manipulation described above, Subject Account-3 sold all remaining 7,066 shares of MCTR at an average price

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[2] Under the FIFO method, the cost of the first shares purchased are matched with proceeds of the first shares sold to determine the net profit.

of $48.21 per share, earning proceeds of $349,546.29 and net profits of approximately $312,655.50 calculated using FIFO methodology.

33. MCTR was the only microcap stock purchased or sold in Subject Account-3 in 2025.

Subject Account-4

34. Subject Account-4 was opened on December 24, 2024 under the name Hua Zhang, with a residential address in Guangdong Province, China.

35. Between February 25 and March 5, 2025, Subject Account-4 purchased 101,756 shares of MCTR for $567,766.28, at an average price of $5.56 per share.

36. On June 5, 2025, during the period of market manipulation described above, Subject Account-4 sold all 101,756 shares of MCTR at an average price of $9.53 per share, earning proceeds of $966,145.41 and net profits of $398,379.13.

37. On June 10, 2025, Subject Account-4 initiated a disbursement for $938,315. That same day, the funds were sent via wire transfer to an account at a Hong Kong bank with Hua Zhang, the owner of Subject Account-4, listed as the beneficiary.

38. MCTR was the only stock purchased or sold in Subject Account-4 in 2025.

Subject Account-5

39. Subject Account-5 was opened on October 14, 2024 under the name Jianwei Li, with a residential address in Guangdong Province, China.

40. Beginning on January 22, 2025, the day of CTRL Group's IPO, and ending on March 10, 2025, Subject Account-5 purchased 157,414 shares of MCTR for $705,349.85, at an average price of $4.53 per share.

41. Between January 22 and March 11, 2025, Subject Account-5 sold 100,835 shares of MCTR at an average price of $4.96 per share, earning proceeds of $506,972.51 and net profits of approximately $82,579.81 calculated using FIFO methodology.

42. On June 5, 2025, during the period of market manipulation described above, Subject Account-5 sold all remaining 56,579 shares of MCTR at an average price of $17.03 per share, earning proceeds of $963,762.86 and net profits of approximately $682,805.71 calculated using FIFO methodology.

43. MCTR was the only microcap stock purchased or sold in Subject Account-5 in 2025.

Subject Account-6

44. Subject Account-6 was opened on February 8, 2025 under the name Shaoyan Huang, with a residential address in Guangdong Province, China.

45. On June 3, 2025, at the start of the period of market manipulation described above, Subject Account-6 purchased 63,300 shares of MCTR for $491,568.75, at an average price of $7.72 per share.

46. Two days later, on June 5, 2025, during the period of market manipulation described above, Subject Account-6 sold all 63,300 shares of MCTR at an average price of $18.53 per share, earning proceeds of $1,121,291.89 and net profits of $629,723.14.

47. MCTR was the only microcap stock purchased or sold in Subject Account-6 in 2025.

Subject Account-7

48. Subject Account-7 was opened on February 12, 2025 under the name Lian Wu, with a residential address in Fujian Province, China.

49. Beginning on February 14, 2025—two days after the account was opened—and ending on March 6, 2025, Subject Account-7 purchased 30,346 shares of MCTR for $150,989.40, at an average price of $4.86 per share.

50. Between March 6 and 14, 2025, Subject Account-7 sold 17,298 shares of MCTR at an average price of $5.79 per share, earning proceeds of $98,499.90 and net profits of approximately $10,064.90 calculated using FIFO methodology. On June 4, 2025, during the period of market manipulation described above, Subject Account-7 sold all remaining 13,048 shares of MCTR at an average price of $19.51 per share, earning proceeds of $254,622.75 and net profits of approximately $192,068.35 calculated using FIFO methodology.

51. On June 9, 2025, Subject Account-7 initiated a disbursement for $2,039,000. The next day, the funds were sent via electronic transfer to an account at the Hong Kong branch of a Chinese bank. MCTR was one of only two microcap stocks purchased or sold in Subject Account-7 in 2025, the other of which was another Chinese issuer listed on Nasdaq that also experienced significant price volatility consistent with a pump and dump scheme in April 2025.

Subject Account-8

52. Subject Account-8 was opened on January 26, 2025 under the name Ming Shan, with a residential address in Jiangxi Province, China.

53. Between February 27 and March 10, 2025, Subject Account-8 purchased 69,002 shares of MCTR for $383,730.53, at an average price of $5.50 per share.

54. On June 5, 2025, during the period of market manipulation described above, Subject Account-8 sold all 69,002 shares of MCTR at an average price of $8.09 per share, earning proceeds of $558,500.35 and net profits of $174,769.82.

55. On June 11, 2025, Subject Account-8 initiated a disbursement for $534,625. That same day, the funds were sent via wire transfer to an account at a Hong Kong bank with Ming Shan, the owner of Subject Account-8, listed as the beneficiary.

56. MCTR was the only microcap stock purchased or sold in Subject Account-8 in 2025.

Subject Account-9

57. Subject Account-9 was opened on February 7, 2025 under the name Ngai Sing Wong, with a residential address in Guangdong Province, China. Subject Account-9 was an account maintained with Interactive Brokers Hong Kong, an affiliate of U.S.-based Interactive Brokers LLC, and a subsidiary of U.S.-based Interactive Brokers Group.

58. Beginning on May 28, 2025 and ending on June 3, 2025—at the start of the period of market manipulation described above—Subject Account-9 purchased 101,545 shares of MCTR for $801,367.24, at an average price of $7.91 per share.

59. On June 5, 2025, during the period of market manipulation described above, Subject Account-9 sold all 101,545 shares of MCTR at an average price of $11.71 per share, earning proceeds of $1,233,512.89 and net profits of $432,145.65.

60. MCTR was the only microcap stock purchased or sold in Subject Account-9 in 2025.

61. The MCTR trades executed in Subject Account-9 were executed through an Interactive Brokers LLC omnibus account maintained by Interactive Brokers Hong Kong. The MCTR stock and cash underlying each trade was settled in the United States using Interactive Brokers LLC's omnibus account for Interactive Brokers Hong Kong, and Subject Account-9's assets and cash were credited or debited accordingly by Interactive Brokers Hong Kong.

Subject Account-10

62. Subject Account-10 was opened on June 23, 2024 under the name Yuanbin Zou, with a residential address in Hong Kong, China. Subject Account-10 was an account maintained with Interactive Brokers Hong Kong, an affiliate of U.S.-based Interactive Brokers LLC, and a subsidiary of U.S.-based Interactive Brokers Group.

63. Beginning on January 22, 2025 the day of CTRL Group's IPO and ending on February 19, 2025, Subject Account-10 purchased 194,596 shares of MCTR for $903,287.25, at an average price of $5.00 per share.

64. Between January 23 and March 26, 2025, Subject Account-10 sold 11,300 shares of MCTR at an average price of $9.89 per share, earning proceeds of $119,860.00 and net profits of approximately $74,159.00 calculated using FIFO methodology

65. On June 3, 2025, during the period of market manipulation described above, Subject Account-10 sold all remaining 183,296 shares of MCTR at an average price of $11.12 per share, earning proceeds of $2,313,937.37 and net profits of approximately $1,456,351.12 calculated using FIFO methodology.

66. On June 4, 2025, Subject Account-10 initiated a disbursement of $999,000. That same day, the funds were sent via wire transfer to an account at a Hong Kong bank with Yuanbin Zou, the owner of Subject Account-10, listed as the beneficiary. In addition, on December 31, 2025, Subject Account-10 initiated a disbursement of $200,000. That same day, the funds were sent via wire transfer to an account at a different Hong Kong bank with Yuanbin Zou, the owner of Subject Account-10, listed as the beneficiary. MCTR was one of two microcap stocks purchased or sold in Subject Account-10 in 2025, the other of which was another Chinese issuer listed on Nasdaq.

67. The MCTR trades executed in Subject Account-10 were executed through an Interactive Brokers LLC omnibus account maintained by Interactive Brokers Hong Kong. The MCTR stock and cash underlying each trade was settled in the United States using Interactive Brokers LLC's omnibus account for Interactive Brokers Hong Kong, and Subject Account-10's assets and cash were credited or debited accordingly by Interactive Brokers Hong Kong.

Combined MCTR Sales Proceeds

68. In total, the Subject Accounts cumulatively earned proceeds from the fraud scheme in the amount of approximately $11,966,324.44 from selling 1,065,313 shares of MCTR, for net profits of approximately $6,331,533.90.

Shared IP Addresses and Device MAC Addresses

69. Subject Accounts-1, 2, 3, 4, 5, 6, 7, and 9 listed a separate residential address in China. However, according to account login records, multiple Subject Accounts were accessed by users using the same IP address[3] on the same days. In addition, according to account login records, multiple Subject Accounts were accessed by users from the same Media Access Control device address ("MAC address"), indicating that Subject Accounts-1, 2, 3, 4, 5, 6, 7, and 9 were accessed using the same computer.[4] Specifically:

a. On January 15, 2025, Subject Accounts-2 and 3 were both accessed from the same IP address ("IP Address-1");

b. On January 15, 16, and 17, 2025, Subject Accounts-2, 3, and 5 were each accessed from the same IP address ("IP Address-2");

[3] An Internet Protocol ("IP") address is a unique number assigned to each device connected to the internet and acts as a digital fingerprint.
[4] A MAC address is a unique identifier assigned to a specific computer device.

c. On January 22, 23, and 24, 2025, Subject Accounts-2, 3, and 5 were each accessed from the same IP address ("IP Address-3");

d. On February 5 and 6, 2025, Subject Accounts-2, 3, and 5 were each accessed from the same IP address ("IP Address-4"). On February 7, 2025, Subject Accounts-3 and 5 were both accessed from IP Address-4;

e. On February 8, 9, 11, and 13 2025, Subject Accounts-3 and 5 were both accessed from the same IP address ("IP Address-5"). On February 10 and 12 2025, Subject Accounts-2, 3, and 5 were each accessed from IP Address-5;

f. On February 9 and 10, 2025, Subject Accounts-1 and 4 were both accessed from the same IP address ("IP Address-6");

g. On February 10, 2025, Subject Accounts-1 and 4 were both accessed from the same IP address ("IP Address-7");

h. On February 23 and 25, 2025, Subject Accounts-3 and 5 were both accessed from the same IP address ("IP Address-8"). On February 24, 26, 27, and 28, 2025, Subject Accounts-2, 3, and 5 were each accessed from IP Address-8;

i. On March 1, 4, and 5, 2025, Subject Accounts-3 and 5 were both accessed from the same IP address ("IP Address-9"). On March 3, 6, and 7, 2025, Subject Accounts-2, 3, 5, and 7 were each accessed from IP Address-9;

j. On March 4 and 6, 2025, Subject Accounts-1 and 4 were both accessed from the same IP address ("IP Address-10");

k. On March 6, 2025, Subject Accounts-6 and 9 were both accessed from the same IP address ("IP Address-11");

l. On March 7 and 12, 2025, Subject Accounts-2, 3, and 5 were each accessed from the same IP address ("IP Address-12"). On March 10 and 13, 2025, Subject Accounts-3 and 5 were both accessed from IP Address-12. On March 11, 2025, Subject Accounts-2, 3, 5, and 7 were each accessed from IP Address-12. On March 14, 2025, Subject Accounts-3, 5, and 7 were each accessed from IP Address-12;

m. On March 12, 2025, Subject Accounts-2 and 7 were both accessed from the same IP address ("IP Address-13");

n. On March 14, 2025, Subject Accounts-3, 5, and 7 were each accessed from the same IP address ("IP Address-14"). On March 17, 2025, Subject Account-3 and 5 were both accessed from IP Address-14. On March 19, 2025, Subject Accounts-2, 3, and 5 were each accessed from IP Address-14. On March 20, 2025, Subject Accounts-3, 6, and 9 were each accessed from IP Address-14. On March 21, 2025, Subject Accounts-6 and 9 were each accessed from IP Address-14;

o. On March 17, 2025, Subject Accounts-1 and 4 were both accessed from the same IP address ("IP Address-15");

p. On March 19, 2025, Subject Accounts-6 and 9 were both accessed from the same IP address ("IP Address-16");

q. On March 25, 2025, Subject Accounts-3, 5, and 6 were each accessed from the same IP address ("IP Address-17");

r. On April 1, 2025, Subject Accounts-5 and 9 were each accessed from the same IP address ("IP Address-18");

s. On April 7, 2025, Subject Accounts-3 and 9 were each accessed from the same IP address ("IP Address-19"). On April 8 and 14, 2025, Subject Accounts-3 and 5 were each accessed from IP Address-19;

t. On April 25, 2025, Subject Accounts-2, 6, and 9 were each accessed from the same IP address ("IP Address-20");

u. On May 2, 2025, Subject Accounts-2 and 3 were both accessed from the same IP address ("IP Address-21");

v. On May 6, 2025, Subject Accounts-2, 3, 6, and 9 were each accessed from the same IP address ("IP Address-22");

w. On May 14, 2025, Subject Accounts-2, 6, and 9 were each accessed from the same IP address ("IP Adddress-23"). On May 15, 2025, Subject Accounts-3, 5, and 9 were each accessed from IP Address-23. On May 16 and 19 2025, Subject Accounts-2 and 9 were both accessed from IP Address-23;

x. On May 21, 2025, Subject Accounts-2, 6, and 9 were each accessed from the same IP address ("IP Address-24");

y. On May 28, 2025, Subject Accounts-5 and 9 were both accessed from the same IP address ("IP Address-25"). On May 30, 2025, Subject Accounts-2 and 9 were both accessed from IP Address-25. On June 2, 2025, Subject Accounts-2 and 5 were both accessed from IP Address-25;

z. On June 3 and 5, 2025—during the period of market manipulation described above—as well as June 6, 2025, Subject Accounts-2, 3, 5, 6, and 9 were each accessed from the same IP address ("IP Address-26"). On June 4, 2025—during the period of market manipulation described above— Subject Accounts-2, 5, 6, and 9 were each accessed from IP Address-26;

aa. On June 3 and 4, 2025, Subject Accounts-1 and 4 were both accessed from the same IP address ("IP Address-27");

bb. On June 10, 2025, Subject Accounts-1 and 4 were both accessed from the same IP address ("IP Address-28");

cc. On June 12, 2025, Subject Accounts-5 and 9 were both accessed from the same IP address ("IP Address-29");

dd. On June 16, 2025, Subject Accounts-1 and 4 were both accessed from the same IP address ("IP Address-30");

ee. On June 18, 2025, Subject Accounts-2 and 9 were both accessed from the same IP address ("IP Address-31");

ff. On June 19, 2025, Subject Accounts-5, 6, and 9 were each accessed from the same IP address ("IP Address-32");

gg. On July 1, 2025, Subject Accounts-5 and 9 were both accessed from the same IP address ("IP Address-33");

hh. On August 6, 2025, Subject Accounts-3 and 6 were both accessed from the same IP address ("IP Address-34");

ii. On August 11, 2025, Subject Accounts-1 and 4 were both accessed from the same IP address ("IP Address-35");

jj. On August 14, 15, and 18, 2025, Subject Accounts-1 and 4 were both accessed from the same IP address ("IP Address-36");

kk. On various dates between January 14, 2025 and July 17, 2025, Subject Accounts-2, 3, 5, and 9 were each accessed from a device registered to the same MAC address and with the same device key[5] ("MAC Address-1" and "Device Key-1");

ll. On various dates between January 15, 2025 and June 3, 2025, Subject Accounts-2, 3, 6, and 7 were each accessed from a device registered to the same MAC address and with the same device key ("MAC Address-2" and "Device Key-2");

mm. On various dates between January 15, 2025 and June 6, 2025, Subject Accounts-2 and 3 were both accessed from a device registered to the same MAC address and with the same device key ("MAC Address-3" and "Device Key-3");

nn. On April 7, 2025, Subject Account-3 was accessed from a device registered to the same MAC address and with the same device key as a device with the same MAC address and device key that accessed Subject Account-2 on March 12, 2025 ("MAC Address-4" and "Device Key-4");

oo. On various dates between March 3 and 19, 2025, Subject Accounts-6 and 9 were both accessed from a device registered to the same MAC address and with the same device key ("MAC Address-5" and "Device Key-5");

pp. On various dates between January 16, 2025 and April 1, 2025, Subject Accounts-2 and 5 were both accessed from a device registered to the same MAC address and with the same device key ("MAC Address-6" and "Device Key-6");

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[5] A device key is a unique access token used to communicate with a specific application or server.

qq. On various dates between May 6, 2025 and June 6, 2025, Subject Accounts-6 and 9 were both accessed from a device registered to the same MAC address and with the same device key ("MAC Address-7" and "Device Key-7");

rr. On various dates between May 13, 2025 and January 22, 2026, Subject Accounts-2 and 7 were both accessed from a device registered to the same MAC address and with the same device key ("MAC Address-8" and "Device Key-8"); and

ss. Furthermore, on January 30, 2026, Subject Account-9 was accessed from the same IP address from which the Provider-1 email account associated with Subject Account-2 registered was accessed on that same day.

70. The sudden unexplained surges as outlined above in the daily trading volume and stock price of foreign issuer microcap companies, such as CTRL Group, is indicative of a type of market manipulation known as a "ramp and dump" or a "pump and dump." In such schemes, bad actors obtain a microcap issuer's stock at a relatively cheap price, manipulate the price of the microcap issuer's stock through various means, including unsubstantiated social media promotional campaigns (the ramp or the pump), and then suddenly sell their entire holdings of the microcap issuer's stock once the price has sufficiently increased (the dump), allowing the bad actors to profit at the expense of other innocent and unsuspecting investors who are unaware that the stock price has been artificially inflated through the scheme.

71. User logins across different accounts from the same IP address or MAC address as outlined above generally indicate commonality of ownership, control, and access. The use of multiple accounts ostensibly registered to different, unaffiliated individuals but actually sharing commonality of ownership and access is indicative of an attempt to conceal coordinated criminal actions. Specifically, in the context of pump and dump market manipulation schemes, the

use of multiple different accounts is a common technique to make it appear that there is wide and diverse interest in a particular security, to mitigate the risk that a single account engaging in significant manipulative activity will be flagged as suspicious, and to conceal the common control of the proceeds resulting from the pump and dump market manipulation and their disbursement.

Seizure of Subject Accounts

72. On or about February 18, 2026, Subject Accounts-1 through 10 were frozen by Interactive Brokers' Compliance Department for suspected market manipulation of MCTR.

73. On or about May 14, 2026, the Honorable Sarah Netburn, United States Magistrate Judge for the Southern District of New York, issued a seizure warrant, 26 Mag. 1858, authorizing the seizure for the Defendants-*in-rem* (the "May 14 Seizure Warrant").[6]

74. On or about June 1, 2026, Interactive Brokers LLC tendered the FBI with ten checks representing all monies, assets, and funds contained in Subject Accounts-1 through 10. On or about June 8, 2026, the ten checks were transferred to the custody of the USMS.

III. FIRST CLAIM FOR FORFEITURE

Forfeiture Under 18 U.S.C. § 981(a)(1)(C) (Property Constituting or Derived from Proceeds Traceable to a Violation of 18 U.S.C. §§ 1343, or Property Traceable to Such Property)

75. Paragraphs 1 through 74 of this Complaint are repeated and re-alleged as if fully set forth herein.

[6] Based on the information known at the time, the May 14 Seizure Warrant incorrectly identified Subject Accounts-9 and 10 as being held by Interactive Brokers LLC, instead of the associated entity, Interactive Brokers Hong Kong. After the May 14 Seizure Warrant was served on Interactive Brokers LLC, Interactive Brokers LLC requested that Interactive Brokers Hong Kong voluntarily transfer the funds maintained in Subject Accounts-9 and 10 to Interactive Brokers LLC, with which request Interactive Brokers Hong Kong complied. On or about June 23, 2026, the Honorable Ona T. Wang, United States Magistrate Judge for the Southern District of New York, issued a seizure warrant, 26 Mag. 2483, for the $1,266,774.99 in United States currency formerly on deposit in Interactive Brokers Hong Kong account number U16295386 held in the name of Ngai Sing Wong, and all funds traceable thereto, and $3,947,313.45 in United States currency formerly on deposit in Interactive Brokers Hong Kong account number U19832813 held in the name of Yuanbin Zou, and all funds traceable thereto, which funds were then in the possession of USMS.

76. Pursuant to Title 18, United States Code Section 981(a)(1)(C), any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of any offense constituting "specified unlawful activity" as defined in Section 1956(c)(7) of this title, or a conspiracy to commit such offense, is subject to forfeiture to the United States. 18 U.S.C. § 981(a)(1)(C).

77. For purposes of Section 1956, "specified unlawful activity" includes "[a]ny act or activity constituting an offense listed in section 1961(1) of this title…" 18 U.S.C. § 1956(c)(7)(A). Section 1961(1) lists, among other things, wire fraud (Section 1343) and fraud in the sale of securities.

78. By reason of the foregoing the Defendants-*in-rem* are subject to forfeiture to the United States pursuant to (i) Title 18, United States Code, Section 981(a)(1)(C) as property constituting or derived from proceeds traceable to wire fraud and securities fraud and (ii) Title 18, United States Code, Section 981(a)(1)(A) as property involved in money laundering.

IV. SECOND CLAIM FOR FORFEITURE

79. Paragraphs 1 through 74 of this Complaint are repeated and re-alleged as if fully set forth herein.

80. Title 18, United States Code, Section 981(a)(1)(A) subjects to forfeiture "[a]ny property, real or personal, involved in a transaction or attempted transaction in violation of section 1956, 1957 or 1960 of this title, or any property traceable to such property."

81. Title 18, United States Code, Section 1956(a)(1)(B)(i) imposes criminal penalties on any person who:

> knowing that the property involved in a financial transaction involves the proceeds of some form of unlawful activity, conducts or attempts to conduct such a financial transaction which in fact involves the proceeds of specified unlawful activity . . .

> knowing that the transaction is designed in whole or in part (i) to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity[.]

82. Under Title 18, United States Code, 1956(c)(7)(A), "specified unlawful activity," includes, among other things, "an offense racketeering activity as defined in 18 U.S.C. § 1961(1)." Section 1961(1) provides in turn that racketeering activity includes, among other things, "any act ... dealing in a controlled substance or listed chemical (as defined in section 102 of the Controlled Substances Act), which is chargeable under State law and punishable by imprisonment for more than one year."

83. As set forth above, "specified unlawful activity," includes, among other things, wire fraud and securities fraud.

84. Title 18, United States Code, Section 1957(a) imposes criminal penalties on any person who:

> knowingly engages or attempts to engage in a monetary transaction in criminally derived property of a value greater than $10,000 and is derived from specified unlawful activity.

85. Title 18, United States Code, Section 1957(f)(3) provides that "the term[] 'specified unlawful activity'…shall have the meaning given [that] term in section 1956 of this title."

86. By reason of the foregoing, the Defendants-*in-rem* are subject to forfeiture to the United States of America pursuant to Title 18, United States Code, Section 981(a)(1)(A), because the Defendants-*in-rem* constitute property involved in monetary transactions in property derived from specified unlawful activity, to wit, securities fraud and wire fraud.

V. **CONCLUSION**

WHEREFORE, plaintiff United States of America prays that process issue to enforce the forfeiture of the Defendants-*in-rem* and that all persons having an interest in the Defendants-*in-rem* be cited to appear and show cause why the forfeiture should not be decreed, and that this Court decree forfeiture of the Defendants-*in-rem* to the United States of America for disposition according to law, and that this Court grant plaintiff such further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Dated: New York, New York
June 30, 2026

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