

Court File No. CV-21-00672880-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

B E T W E E N:

BAO YING CAO and 13364097 CANADA INC.

Applicants

and

XIAODONG YANG and USERS OF SUNRISE TECHNOLOGY

Respondents

APPLICATION RECORD

December 3, 2021

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TO: **XIAODONG YANG**

Respondent

AND TO: **USERS OF SUNRISE TECHNOLOGY**

Respondents

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Court File No.

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

Electronically issued : 30-Nov-2021
Délivré par voie électronique : 30-Nov-2021
Toronto

Bao Ying Cao and 13364097 Canada Inc.

Applicants

and

Xiaodong Yang and Users of Sunrise Technology

Respondents

**NOTICE OF APPLICATION
(Ex Parte)**

TO THE RESPONDENT

A LEGAL PROCEEDING HAS BEEN COMMENCED by the applicant. The claim made by the applicant appears on the following page.

THIS APPLICATION will come on for a hearing

- In person
- By telephone conference
- By video conference

at the following location:

330 University Avenue, 9th Floor, Toronto ON M5G 1R7 on December 7, 2021 at 12:00 p.m. before a judge presiding over the Commercial List

IF YOU WISH TO OPPOSE THIS APPLICATION, to receive notice of any step in the application or to be served with any documents in the application, you or an Ontario lawyer acting for you must forthwith prepare a notice of appearance in Form 38A prescribed by the *Rules of Civil Procedure*, serve it on the applicant's lawyer or, where the applicant does not have a lawyer, serve it on the applicant, and file it, with proof of service, in this court office, and you or your lawyer must appear at the hearing.

IF YOU WISH TO PRESENT AFFIDAVIT OR OTHER DOCUMENTARY EVIDENCE TO THE COURT OR TO EXAMINE OR CROSS-EXAMINE WITNESSES ON THE APPLICATION, you or your lawyer must, in addition to serving your notice of appearance, serve a copy of the evidence on the applicant's lawyer or, where the applicant does not have a

lawyer, serve it on the applicant, and file it, with proof of service, in the court office where the application is to be heard as soon as possible, but at least four days before the hearing.

IF YOU FAIL TO APPEAR AT THE HEARING, JUDGMENT MAY BE GIVEN IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO OPPOSE THIS APPLICATION BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

Date November 30, 2021

Issued by _____
Local Registrar

Address of court office: Superior Court of Justice
330 University Avenue, 9th Floor
Toronto ON M5G 1R7

APPLICATION

1. The applicants, 13364097 Canada Inc. and Bao Ying Cao, make an *ex parte* application for:
 - (a) A declaration that a conflict exists among the respondents regarding their claims to a fund or funds held by 13364097 Canada Inc. and Bao Ying Cao (the “**Contested Funds**”);
 - (b) A declaration that the applicants have no beneficial claim to the Contested Funds, having received the Contested Funds innocently as a result of a fraudulent scheme perpetrated by the respondent Xiaodong Yang;
 - (c) An order under Rules 43.04(1) and 43.04(2)(g) directing 13364097 Canada Inc. and Bao Ying Cao to transfer the Contested Funds to a receiver, and directing the receiver to determine and report on a plan for the fair and equitable distribution of the Contested Funds to the respondents;
 - (d) An order under Rule 41.03 appointing BDO Canada Limited as the receiver on terms to be furnished prior to the hearing of this application;
 - (e) An order under Rule 43.04(1)(c) that the costs of the applicants be paid out of the proceeds of the Contested Funds;
 - (f) An order under Rule 43.04(1)(b) that upon compliance with the order of this Court, the liability of the applicants in respect of the Contested Funds is extinguished;

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(g) Such further and other Relief as to this Honourable Court may seem just.

2. The grounds for the application are:

(a) Bao Ying Cao is an individual residing in Richmond Hill, Ontario. She is the sole director and shareholder of 13364097 Canada Inc (“**13364097**”).

Cao’s inducement into the fraudulent scheme

(a) On July 25, 2021, Cao replied to a part-time trading job ad posted on the Chinese-Canadian forum yorkbbs.ca. Cao and the poster of the ad, who later identified himself as Xiaodong Yang and claimed to live in Shanghai, China, began to communicate over WeChat and WhatsApp.

(b) Yang told Cao that he was seeking her assistance in trading USDT, a form of cryptocurrency. Yang said that he would send money to Cao to buy USDT, which she would then transfer to him.

(c) Yang promised to pay Cao a 5% commission for each transaction. Cao sent Yang her e-transfer email addresses to receive funds from Yang. Cao told Yang that she did not need a password to receive these funds because she had enabled auto-deposit on her accounts.

Cao’s participation in the scheme

(d) In August, Yang’s operation evolved beyond what he originally represented to Cao. Yang asked Cao to help process transactions for his customers. He told Cao

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that he operated a cryptocurrency trading platform called Sunrise Technology where customers could order USDT. Yang told Cao that customers would send funds to her bank accounts, and she should use that money to purchase and transfer USDT to him to distribute to his customers.

- (e) Yang also often asked Cao to send money back to customers. He told her that these were either customer refunds or payments to customers who sold USDT on his platform.
- (f) Cao initially trusted that Yang was running a legitimate business. As an administrative assistant, Cao was not financially sophisticated and did not understand the nature of cryptocurrency trading. She relied on Yang to direct her as to every aspect of the operation.
- (g) Cao processed numerous transactions per day at Yang's direction. Yang told Cao to open additional bank accounts in order to bypass each account's daily transaction limit. Ultimately, at Yang's instruction, Cao used six bank accounts and two alternative payment methods to facilitate the transactions:
 - (i) two existing personal bank accounts at HSBC and Scotiabank;
 - (ii) an existing PayPal account;
 - (iii) a personal account at CIBC opened August 31, 2021;

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- (iv) a business account opened September 23, 2021 under the name of the applicant 13364097 Canada Inc., a business which Cao incorporated for this purpose;
 - (v) an EQ Bank Canada account opened September 10, 2021, whose purpose was to purchase USDT;
 - (vi) a personal account at RBC opened September 28, 2021; and
 - (vii) a Wise Payments Canada Inc. money transfer account, opened September 28, 2021.
- (h) Yang asked Cao to process an increasing number of transactions throughout September and October. By the end of September, Cao became alarmed at the volume of funds flowing into the accounts and became suspicious as to the legitimacy of Yang's business. She demanded that Yang provide reassurance as to the legality and propriety of the business and sought further details about Yang's identity. Yang responded by providing a scanned copy of what he represented to be his passport, and convened a meeting with an individual Yang represented to be a Shanghai-based lawyer.
- (i) Cao was unsatisfied by Yang's responses to her inquiries. She told him she no longer wished to facilitate the transactions and asked Yang to stop marketing the business. Yang responded by threatening Cao, including by claiming that customers would file charges with the police should Cao stop moving funds as he directed her to do.

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Cao's recourse to legal counsel

- (j) On October 5, Cao sought legal advice from a local lawyer. After several discussions with various Ontario-based counsel, Cao retained Polley Faith LLP on October 27, 2021. Shortly after being retained, Polley Faith LLP determined that Cao had been a victim of a fraudulent Ponzi scheme, advised her to stop communicating with Yang and engaging in transactions, and moved to preserve the funds held in the various accounts holding the Contested Funds.
- (k) Through further investigation, Polley Faith LLP determined that despite telling Cao he was operating a USDT trading platform, Yang was in fact marketing a scheme under the name Sunrise Technologies in which users were offered “commissions” for placing false e-commerce orders through a downloadable application. The company’s website (www.sunrise-tech.ca) claimed that Sunrise Technologies was a subsidiary of Omnicom Group, an international communications company, with annual revenues of \$15 billion. In fact, Omnicom Group had no relationship with Sunrise Technology. Upon learning of the misrepresentation, Omnicom Group moved to have Sunrise Technology’s website taken down.
- (l) Polley Faith LLP determined that Yang’s supposed business, including the application and website marketed as Sunrise Technologies, was a form of Ponzi scheme designed to entice users to make small payments and receive small returns, and to gradually make larger investments that Yang had no intention to

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repay. Yang concealed the true purpose of his scheme from Cao, principally through representations made through the WhatsApp and WeChat encrypted communications platforms. Yang's true identity and location are unknown.

Mitigation of losses to users

- (m) In all, Yang convinced Cao to purchase approximately \$150,000 in USDT using the Contested Funds and to transfer these to his cryptocurrency wallet. Although he demanded that Cao purchase and transfer far more than this amount, Cao declined to do so. As such, the majority of the amounts transferred by users to the applicants' bank accounts has been preserved.
- (n) Cao has voluntarily reported Yang's operation to the York Regional Police Service and has fully cooperated with its investigation. The scope of Yang's fraud and the identities of the victims are unknown at this time, but it is estimated that there may be over 500 victims of Sunrise Technology.

Relief sought

- (o) The applicants claim no beneficial interest in these funds and are innocent holders of property over which there are competing claims by the respondents.
- (p) Accordingly, the applicants seek an urgent interpleader order directing the applicants to transfer the Contested Funds to a receiver and directing the receiver to determine and report on a plan for the fair and equitable distribution of the

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Contested Funds to the respondents. The applicants have contacted the Ministry of the Attorney General, which has no objection to this civil application.

- (q) The applicants additionally seek the appointment of BDO Canada Limited as a receiver on terms to be furnished prior to the hearing of this application. Since there may be over 500 victims of Yang's fraud, a court-appointed receiver will be the most efficient process to distribute these funds and avoid a multitude of court proceedings.
- (r) The applicants seek this interpleader order on an *ex parte* basis. It would be impracticable to notify all potential claimants of this application and Yang's true identity and address are unknown at this time.
- (s) The applicants seek a declaration that their costs be paid out of the Contested Funds and that their liability in respect of the proceeds is extinguished after compliance with the interpleader orders.

Urgency of the relief sought

- (t) Users of Sunrise Technology have contacted Cao directly to demand the return of their money with increasingly intensity and urgency. Three individuals have attended at her family's residence, whose address is listed on the incorporation documents of the applicant 13364097 Canada Inc. The York Regional Police have advised Cao that unidentified users have threatened to attend her family's residence as a group to demand the return of their money. Cao and her family fear for their safety.

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- (u) *Rules of Civil Procedure:*
 - (i) Rules 43.01, 43.02(1), 43.03, and 43.04 with respect to interpleader applications;
 - (ii) Rules 41.02, 41.03, and 41.05 with respect to the appointment of a receiver.
 - (v) Sections 101(1) and (2) of the *Courts of Justice Act*.
 - (w) Such further and other grounds as the lawyers may advise.
3. The following documentary evidence will be used at the hearing of the application:
- (a) The affidavit of Bao Ying Cao;
 - (b) The affidavit of Jeffrey Wang;
 - (c) The affidavit of Angelo Consoli of BDO Canada Limited;
 - (d) Such further and other evidence as the lawyers may advise and this Honourable Court may permit.

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(Date of issue)

November 30, 2021

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13364097 Canada Inc.

BAO YING CAO AND 13364097 CANADA INC.
Applicants

-and- **XIAODONG YANG AND USERS OF SUNRISE TECHNOLOGY**
Respondents

Court File No.

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

**PROCEEDING COMMENCED AT
TORONTO**

NOTICE OF APPLICATION

POLLEY FAITH LLP
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Inc.

Court File No. CV-21-00672880-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

BETWEEN:

BAO YING CAO and 13364097 CANADA INC.

Applicants

and

XIAODONG YANG and USERS OF SUNRISE TECHNOLOGY

Respondents

AFFIDAVIT OF BAO YING CAO

I, Bao Ying Cao, of the Richmond Hill, in the Province of Ontario, MAKE OATH AND SAY:

1. I am one of the applicants in this proceeding, and, as such, have knowledge of the matters contained in this affidavit. Where my affidavit is based on the information of others, I state the source of this information and believe it to be true.
2. I immigrated to Canada at the age of 16. After high school, I attended Seneca College for the Travel and Tourism program. Currently I am working as an assistant to a real estate broker. I do not have a corporate or business background and I have never been involved with cryptocurrency before July 25, 2021.

My initial interactions with Yang

3. On July 25, 2021, I was browsing a Chinese-Canadian online forum called yorkbbs.ca. I came across a part-time trading job advertisement on this forum. The advertisement had little information and provided a WeChat contact for more information.
4. I messaged the WeChat profile on the same day. The person I messaged told me that he needed help buying USDT, which I learned is a form of cryptocurrency. He told me that he would transfer me money to purchase USDT, which I would then transfer back to him. He told me that I would be paid a 5% commission for each transaction. I told him that I had no experience in cryptocurrency or this type of transaction, but he did not ask me for further qualifications or credentials relating to this job.
5. I later found out that the person I was messaging claimed that his name was Xiaodong Yang and that he lived in Shanghai, China. I only spoke to Yang over WeChat and WhatsApp. I never saw his face other than the photo on what he said was his passport.
6. Over the next few days, I told Yang that I preferred to receive money through e-transfers and sent Yang my e-transfer email address, which was linked to my HSBC bank account. I told him that I did not need a security password to receive e-transfer funds because I had auto-deposit enabled on my bank accounts. I also downloaded Binance, which is a cryptocurrency trading platform, at Yang's instruction. I sent him a photo of my passport.
7. On August 3, 2021, Yang transferred me money to then transfer to one of his "customers". Yang told me that this was a customer refund. This was the first time he mentioned that there were customers involved in this job. I did not understand his request, but I then trusted

his assurances that this was a legitimate part of his business, and I sent the e-transfer through my HSBC account.

8. On August 4, 2021, Yang taught me how to purchase USDT through Binance. I made my first USDT purchase that day at Yang's instruction. On August 5, 2021, Yang sent me a QR code to his "imToken" digital wallet – which allowed me to transfer cryptocurrency to Yang – and told me to transfer the USDT that I had purchased to this wallet. I complied with his instructions.

9. I asked Yang for details about his business during this time. He told me that he operated a cryptocurrency platform and purchased USDT for customers who did not know how to purchase cryptocurrency themselves. He also told me that customers used his service because he had access to a USDT discount. I later learned that his platform was called Sunrise Technology. Yang told me that customers would send money to my accounts, which I should use to purchase USDT. He told me to then send that USDT to him to distribute to the customers.

10. Since I had no experience in business or cryptocurrency, I did not then understand that anything Yang had asked me to do was improper or unusual. Further, as Yang had not asked me to contribute any of my personal funds in the venture, I did not believe then that he was operating a fraud or unlawful enterprise. I therefore agreed to Yang's plan and complied with his instructions.

I begin participating in Yang's operation

11. In August 2021, Yang involved me in many aspects of his operation very quickly. On August 6, I began to receive e-transfers from Yang's customers into my bank accounts. Yang

also began sending me a daily list of customers to whom I needed to send money. He told me that these were either customer refunds or payments for USDT traded on his platform.

12. I performed these daily transactions from August 6, 2021 to October 26, 2021. All customer funds I received into my bank accounts were through e-transfers. The vast majority of funds I sent back to customers were also through e-transfer. I used PayPal to transact with customers who preferred this method. Later in September, I used the Wise platform, which is an application that allows for an unlimited number of daily e-transfers, to send money to customers. I also sent bank drafts from my CIBC Business account for customers who required them.

13. As the operation continued through August and September of 2021, the volume of customer transactions increased. I initially used both my Scotiabank and HSBC accounts to transact with customers. However, these accounts imposed a daily transaction limit. Yang repeatedly asked me to open up new bank accounts. On August 31, 2021, I opened a CIBC personal account to be able to process more transactions.

14. On September 6, 2021, I met a cryptocurrency trader on Binance named Chenda Lin. Lin received payment for USDT trades through his EQ account and recommended to Yang and I that we also open an EQ bank account. This was because there was a large \$30,000 daily transfer limit between EQ accounts. After hearing this, Yang told me to open an EQ account. I opened the account as he instructed. I used this EQ account to purchase USDT and to send money to my Wise account for customer transactions. Before I opened this EQ account, I purchased USDT with my other bank accounts.

15. In mid-September 2021, I was no longer comfortable with the volume of customer funds that came into my personal bank accounts. I talked to Yang about incorporating a business for this operation and he was supportive of this idea. On September 21, my accountant incorporated 13364097 Canada Inc. ("133"). On September 23, 2021, I opened a CIBC business account linked to 133. From this point onwards, I primarily used this account to process customer transactions, although some customers who had already sent money to my other accounts continued to send money to those accounts. I only incorporated 133 to hold funds from Yang's customers and to increase the number of daily transactions I could perform. I did not mix personal funds with the funds in 133.

16. Attached as Appendix "A" is a summary of all the bank accounts and other platforms I operated for Yang's operation.

17. Yang also instructed me to purchase USDT on Binance and then transfer it to his imToken digital wallet. Yang told me that the USDT I sent to him would be redistributed to the "customers" who had been sending me funds. I would only purchase USDT when Yang asked me to, and I sent all amounts purchased to Yang. I used customer funds to purchase USDT on Binance by e-transferring the purchase price to Binance traders through my various bank accounts. Once the traders received my e-transfer, they would release the USDT to me on Binance. I would then withdraw the USDT and send it to Yang's via his imToken QR code. Yang once instructed me to sell USDT on Binance because I did not have enough money to transact with customers. I did as he instructed. I ultimately purchased \$152,588 worth of USDT and transferred these amounts to Yang. Although I believed at that time that Yang would redistribute the USDT I sent him to "customers," I do not know if he ever did so.

18. Yang also told me when to withdraw my 5% commission and how much to withdraw. When he instructed me to do so, I transferred these amounts from my chequing accounts to my HSBC and CIBC business savings accounts. Although I separated these amounts from other customer funds, I did not deplete these funds. On a single occasion, I transferred approximately \$21,000 of the monies designated as my “commissions” to a separate RBC account, but I returned this money to my HSBC account once I learned that Yang’s operation may be fraudulent. The result is that there are no longer any “customer” funds in this RBC account. I do not believe that I converted any “customer” funds to my personal use. If I have inadvertently depleted any of these funds, I am willing to repay these amounts.

19. To summarize, beginning in August 2021, I undertook the following transactions at Yang’s instruction:

- (a) Received customer funds into my Scotiabank, HSBC, CIBC Personal, CIBC Business, and PayPal accounts;
- (b) Transferred some customer funds back to customers using my Scotiabank, HSBC, CIBC Personal, CIBC Business, EQ, Wise, and PayPal accounts;
- (c) Purchased USDT from traders on Binance and transferred the USDT to Yang;
- (d) Transferred “commissions” to my HSBC and CIBC Savings accounts.

I begin to become suspicious of Yang and seek legal advice

20. On September 22, 2021, I told my boyfriend about my involvement in Yang’s operation for the first time. He questioned whether Yang was in fact distributing the USDT to customers as

he promised. Hearing his concerns made me very anxious and suspicious. I wanted to seek legal advice to make sure that Yang's business was in fact legitimate as he had represented to me.

21. On October 5, 2021, I consulted a lawyer for the first time. He was not knowledgeable in my issue and referred me to other lawyers. I continued to consult various lawyers throughout October until I retained Polley Faith LLP on October 26, 2021.

22. During October 2021, and prior to retaining Polley Faith LLP, the volume of daily customer transactions was becoming overwhelming. I barely had time to keep up with the transactions. I told Yang multiple times to stop advertising this business until I could be sure that it was legally compliant. He told me that this was not possible because he had already paid for the advertisements.

23. I continued to receive an influx of customer funds into my bank accounts. I felt obligated to continue transacting with customers during this time because I held such a large amount of customer funds. Yang also threatened that if I stopped the operation, customers would file complaints.

24. I did not understand that Yang's operation was a fraud until the Polley Faith lawyers investigated the Sunrise Technology business with me on and after October 26, 2021. After I learned of this fact, I immediately stopped communicating with Yang and did not further transact with customers.

25. Since stopping the operation, Yang has repeatedly messaged me and called me. He has threatened that customers will be taking police action. He sent me his last message on October 30 and he appears to have since blocked me on WhatsApp and WeChat.

Events since retaining Polley Faith LLP

26. Since retaining Polley Faith LLP, I have learned that Yang's operation was not as he had represented to me. Instead of providing a USDT trading platform, in fact, Yang had advertised an entirely different business to the public. I now understand that Yang's Sunrise Technology business was an application which offered commissions for users' participation in a scheme said to involve placing fake orders on various e-commerce platforms. Yang never mentioned anything remotely related to this scheme. I knew nothing of the real Sunrise Technology application and have never downloaded it. As I have affirmed above, Yang had told me that all customer funds I had received and sent were specifically for trading in USDT.

27. I understand that my lawyers have contacted the banks with which I have accounts to disable the auto-deposit feature. I believe the last auto-deposit I received from a Sunrise Technology customer was on November 5, 2021.

28. Since I stopped transacting with customers, many customers have emailed me directly to demand the return of the money that they believed they had loaded onto the Sunrise Technology platform. Some customers are also asking for further commission withdrawals from Sunrise Technology. Many of these customers are very desperate. Since I used my family's address as the address of 133 (then believing that Yang and his business were legitimate, and so having nothing to hide myself), three customers have come to my family's home to demand the return of their money. I am very afraid for my family's safety.

29. I have filed a complaint about Yang and his business with the York Regional Police, and am fully cooperating with their investigation, including by providing a large package of

evidence. I provided a statement to Detective Matthew Robinson-Vincent on November 18, 2021. I understand that Sunrise Technology customers have also been in contact with Mr. Robinson-Vincent.

30. To the best of my knowledge, I now hold over \$1.3 million of customer funds in all my bank accounts combined, most of which are not intermingled with my personal funds. The only accounts in which this has occurred is my HSBC and Scotiabank accounts, both of which together now hold under \$50,000. I now understand that these funds do not belong to me and I have no interest in these funds. My only interest is to ensure that these funds are returned to people who were defrauded by Yang. I am committed to returning these funds to the respondents entitled to them in whatever manner is directed by the Court. I have not colluded with either Yang or any users of Sunrise Technology in making this application.

31. Due to the complexity and volume of transactions I performed and the number of accounts and platforms I used, I am unable to determine how and to whom I should return the customers' funds. A detailed accounting of my bank records will likely be required. It is for this reason that I am seeking the assistance of the Court.

32. Additionally, as an assistant to a real estate broker with an annual salary of approximately \$60,000, I would suffer financially if I were required to personally finance the cost of bringing this application.

SWORN by Bao Ying Cao of the ~~the~~, in the ~~the~~,
before me at the [city/town], in the [region],
on December 3, 2021 in
accordance with O. Reg. 431/20,
Administering Oath or Declaration Remotely.

Richmond Hill, Ontario before me (remotely)
in Toronto, Ontario *BL*



Commissioner for Taking Affidavits
(or as may be)



BAO YING CAO

B. KIRKHAM
70643W

Appendix A

Account	Account Number/Name	Date Opened	Used As	Approximate Balance of Contested Funds	Intermingled funds
Scotiabank	28472-03879-83	Open prior to meeting Yang	Used as a personal account prior to meeting Yang. Used as one of the accounts for this operation	Unknown (intermingled with personal funds)	Contains intermingled funds
CIBC Personal	83-72195 (Branch Transit Number: 02242)	August 31	Used as one of the accounts for this operation	Chequing - \$7334.20 Savings - \$0	Does not contain intermingled funds
CIBC Business Chequing	90-39112 (Branch Transit Number: 02242)	September 23	Used as the primary account for this operation after it was opened	\$1,230,610.15	Does not contain intermingled funds
CIBC Business Savings	90-39317 (Branch Transit Number: 02242)	September 23	Currently holds part of the 5% commission that Cao thought she was entitled to.	\$66,520.81	Does not contain intermingled funds

HSBC Chequing	332-135217-152	August 18	Used as one of the accounts for this operation	\$29,121.95 (HSBC has locked Cao out of her account, so we cannot be sure of this amount)	Contains a minimal amount of intermingled funds (few hundred dollars)
HSBC Savings	332-135217-203	August 18	Used to hold part the 5% commission that Cao thought she was entitled to	\$5.82 (HSBC has locked Cao out of her account, so we cannot be sure of this amount)	Does not contain intermingled funds
RBC	03012-5089206	September 28	Once held part of the 5% commission that Cao thought she was entitled to, or about \$21,000. This amount has since been transferred to the HSBC account.	\$0	Does not contain customer funds
EQ	107-237-917	September 10	Used to purchase USDT and to transfer money to the Wise platform	\$26.62	Does not contain intermingled funds
Wise	200110136648	September 28	Used to send e-transfers to customers	\$20,766.75 (Wise has deactivated this account)	Does not contain intermingled funds

PayPal	ivycao23@hotmail.com	August 4	Used to receive funds from and send funds to customers who prefer this method	\$65.00	Does not contain intermingled funds
PayPal	Baoyingcao1987@outlook.com	Unknown	Used to receive funds from and send funds to customers who prefer this method	\$326.16	Does not contain intermingled funds

BAO YING CAO et al.
Applicants

-and- XIAODONG YANG et al.
Respondents

Court File No. CV-21-00672880-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

**PROCEEDING COMMENCED AT
TORONTO**

AFFIDAVIT OF BAO YING CAO

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Lawyers for the applicants

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SUPERIOR COURT OF JUSTICE
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B E T W E E N:

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XIAODONG YANG and USERS OF SUNRISE TECHNOLOGY

Respondents

**AFFIDAVIT OF JEFFREY WANG
(DECEMBER 3, 2021)**

I, Jeffrey Wang, of the City of Toronto, in the Province of Ontario, AFFIRM:

1. I am an articling student at Polley Faith LLP, counsel for the applicants. In that capacity, I have knowledge of the facts in this affidavit. Where my affidavit is based on the information of others, I state the source of this information and believe it to be true.
2. I have assisted Polley Faith LLP in investigating the Sunrise Technology application. I first learned of Sunrise Technology after Bao Ying Cao retained our firm on October 26, 2021. Ms. Cao told me that she had been communicating with Xiaodong Yang, who told her that he operated a cryptocurrency trading platform called Sunrise Technology. Ms. Cao told me that she has operated multiple bank accounts at Yang's instruction to enable customers to transact with Sunrise Technology.
3. I have determined that Yang has lied to Ms. Cao about the nature of Sunrise Technology and that the Sunrise Technology platform is a fraud.

Our firm's investigation

4. Upon learning from Ms. Cao that Yang called his business "Sunrise Technology", members of my firm, including myself, performed several Google searches that led to a website with the URL "www.sunrise-tech.ca". At the time of affirming this affidavit, the website is down (the reason for which I detail below), however I preserved screenshots of the website attached to this affidavit as "**Exhibit A**". I believe that this website was connected to Yang based on its name as well as its logo, which matched the logo used by Yang in his Whatsapp chats with Ms. Cao. The website described Sunrise Technology as a multibillion-dollar marketing company and linked to an app available on the Apple Store and Google Play platforms.

5. As part of our investigation, I downloaded a copy of the Sunrise Technology application from the Google Play store and signed up with a pseudonym. I learned from this that the Sunrise Technology application is a mobile application that allows users to earn "commissions" by placing false e-commerce orders. To place orders, users must first upload funds onto the application in the form of Canadian dollars or USDT cryptocurrency. Each user can perform up to twenty (20) orders per day. Users can then withdraw their commissions in the form of Canadian dollars or USDT cryptocurrency. Attached as **Exhibit "B"** are relevant screenshots of the Sunrise Technology application.

6. I was able to confirm that the Sunrise Technology application that I investigated is associated with Yang's operation. I discovered that this application contains the same imToken QR codes that Yang provided to Ms. Cao when he asked her to send him USDT. The imToken QR codes on the application enabled users to send USDT directly to Yang's digital wallet. Attached as **Exhibit "C"** are screenshots of the QR codes.

7. From my investigation, I determined that the funds that Cao was receiving into her bank accounts – which Yang represented as customers placing USDT orders – were obtained from Sunrise Technology users who believed that they were loading funds onto the application. I determined this not only from the fact that the Sunrise Technology app was associated to Yang’s operation, but also from emails I had viewed in which customers had demanded the return of money that they had sent to Ms. Cao by e-transfer, believing that they had loaded these funds onto the Sunrise Technology application. A sample of these emails is attached as **Exhibit “D”**.

8. I also believe, although did not determine with certainty, that the funds that Yang told Cao to send back to customers – which Yang had represented were refunds or payments for a USDT trade – were in fact paid to Sunrise Technology users who believed they were “withdrawing” their commissions.

I believe that Sunrise Technology is a fraud

9. For the following reasons, I believe that Yang’s operation was a fraudulent scheme:

- (a) Yang received proceeds from his scheme by the USDT transfers that Yang told Sunrise Technology users and Ms. Cao to send to his imToken digital wallet. According to my limited knowledge of cryptocurrency, I believe that such digital wallets are difficult, if not impossible, to trace;
- (b) The website for Sunrise Technology (sunrise-tech.ca) claimed that the company was a subsidiary of Omnicom Group, an international communications company with annual revenues of \$15 billion. Andrew Faith, a partner of our firm, contacted the Associate General Counsel of Omnicom Group, who confirmed that

the company has no affiliation with Sunrise Technology. Attached as **Exhibit “E”** is a copy of the email between Omnicom Group and Mr. Faith. I believe that Omnicom Group has since taken action to remove the Sunrise Technology website. Attached as **Exhibit “F”** is a copy of the email from Omnicom Group to Mr. Faith to this effect;

- (c) Although Sunrise Technology has now accumulated over \$1.3 million in user funds, the entirety of this money was moved through unsophisticated methods such as e-transfers and PayPal. The application also used unsophisticated methods such as WhatsApp to communicate with its users;
- (d) Yang recruited Cao to work on Sunrise Technology on a Chinese-Canadian online forum called yorkbbs.ca. This initial job posting has now been deleted. Yang did not inquire into Ms. Cao’s qualifications and immediately involved her in all aspects of the operation. As his operation expanded, Yang posted similar ads containing his WeChat contact information on yorkbbs.ca and other Chinese-Canadian forums looking for additional help. Attached as **Exhibit “G”** are screenshots of these later ads;
- (e) According to Ms. Cao, Yang never appeared on camera and only communicated with Ms. Cao via encrypted apps such as WhatsApp and WeChat;
- (f) Many users of Sunrise Technology have reported that the application is fraudulent. On the Google app store, many reviews of the application claim that Sunrise Technology will only allow a limited number of commission withdrawals.

Many users have reported that they have lost money to the application. Attached as **Exhibit “H”** is a screenshot of these reviews;

- (g) Customers have emailed our firm stating that they had lost money to the Sunrise Technology application by sending e-transfers to other recipient accounts not associated with Ms. Cao. Attached as **Exhibit “I”** are examples of these emails.
- (h) Following Ms. Cao’s refusal to engage further with Yang shortly after she retained our firm, Yang has failed to assert any legitimate ownership of or rights to his business or the funds held by Ms. Cao. In fact, I understand from Ms. Cao that she is no longer able to contact Yang on his WhatsApp and WeChat accounts.

Events since Ms. Cao retained Polley Faith LLP

10. Our firm advised Ms. Cao to stop participating in the Sunrise Technology scheme as soon as we were retained on October 26, 2021. Soon after, the Sunrise Technology application published a notice that from October 28 onwards, the application would no longer accept cash deposits and withdrawals. I believe that this loss of functionality was likely due to Ms. Cao’s refusal to further transact with customers. Attached as **Exhibit “J”** is screenshot of this message in the Sunrise Technology application.

11. Many Sunrise Technology users have been contacting Ms. Cao and our firm to demand the return of their money. Many have represented that they are no longer able to withdraw their commissions despite loading money onto the application and have lost significant amounts of money.

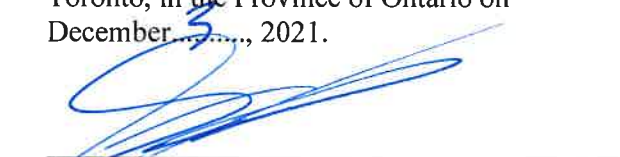
12. Our firm has been in contact with the York Regional Police and Michael Fawcett, the Crown Counsel assigned to this case. Mr. Fawcett has agreed that this civil interpleader order and the appointment of a receiver is the best way to distribute customer funds back to the entitled respondents, as opposed to a criminal forfeiture action. Attached as **Exhibit “K”** is the email from Michael Fawcett to Andrew Faith to this effect.

13. Following our case conference with Mr. Justice Michael Penny on November 30, 2021, our firm has tried to serve as many users of Sunrise Technology as possible with the notice of application. We have been in contact with Detective Matthew Robinson-Vincent from the York Regional Police who has access to a WhatsApp group containing 149 users of Sunrise Technology. He advised me on December 1, 2021 that he has provided the notice of application to these users.


14. Our firm has also extracted the email addresses of everyone who has transacted with the applicants in relation to the Sunrise Technology application. We have served these addresses with the notice of application on December 2, 2021. It appears that we could not access the emails of the customers who sent e-transfers to the applicants from RBC accounts, since RBC auto-generates a temporary email for e-transfer purposes.

15. Our firm has also created a dedicated email address to handle inquiries from Sunrise Technology users. We have received emails from some users suggesting that Cao and 13364097 Canada Inc. are not the only entities that hold funds relating to the Sunrise Technology fraud. Some users of Sunrise Technology may have sent funds to other accounts not controlled by Cao. Our firm has no knowledge of these accounts.

AFFIRMED BEFORE ME at the City of Toronto, in the Province of Ontario on December 5, 2021.



Commissioner for Taking Affidavits
(or as may be)



JEFFREY WANG

SANDY LOCKHART
Barrister & Solicitor
LSO #73554J

This is **Exhibit "A"** referred to in the
Affidavit of Jeffrey Wang, affirmed before me at the City of
Toronto, in the Province of Ontario, this 3rd day of December, 2021



Commissioner for Taking Affidavits (or as may be)

Sunrise Technology



Sunrise Group, known as an independently operated business under Omnicom Europe Limited, has been leading the global digital marketing business since its foundation, founded in London on September 16, 2012 and started its operation from August 18, 2016.



Chairman & CEO: John Wren



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Annual Revenue: US\$14.95 billion



Abbreviation: Sunrise



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Headquarter: Bankside 3, 90 – 100 Southwark Street, London, SE1 0SW.

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Sunrise Technology

evaluating sales performance by customized strategy in marketing, media and public relationship.

The unique marketing strategies by Sunrise group have been supporting a wide range of customers right from global marketing groups to regional enterprises, as well as millions of individual businesses. With its full range of marketing services, Sunrise users either merchants or individual users are all able to work seamlessly from anywhere, anytime. Simply by one post, Sunrise merchant users are able to optimize their operation data instantly. Supported by 1,500+ agencies in 100+ countries and regions, Sunrise is able to provide numerous of flexible & integrated marketing solutions with its global resources.

From one single marketing event to multiple & long term marketing plans, fully tailor-made solutions will be available for any customers in any region.

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Sunrise is a technology driven group which was born for value creation, it has been building key barriers since its establishment 7 years ago.

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Sunrise owns the world's leading one-stop cloud computing and data advantages. It reconstructed the supply and demand of media resources by reality, effectiveness, and continuation of digital marketing. There are two reportable departments in Sunrise group, namely the Integrated Agency Network (IAN) and the Constituency Management Group (CMG). IAN is composed of Amazon, eBAY, Lazada, Rakuten.com, Sunrise Data & Digital, and few integrated digital companies. It will also report the results of the "Company and Other" group. Sunrise is a core technology driven group with business philosophy of customer-centric. The continuous innovation has been creating value for users and partners through the powerful supply chain, data, technology and marketing models, providing efficient product and service experience to users anywhere in anytime. The main business of Sunrise is to provide e-commerce merchants, enterprises, and practitioners with a smart cloud ordering system to help users earn reasonable commissions, assist merchants and enterprises to elevate their marketing and sales performance in more cost-effective ways, helping online merchants increase their sales volume with higher efficiency.

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In the era of the epidemic: Sunrise to respond to COVID-19 together

All Sunrise members will fight side by side with you to fight the Covid-19 virus!

As the world responds to the **COVID-19 epidemic**, our idea is to work with the affected people and medical professionals who work around the clock to help those who need it most. At Sunrise, we are committed to protecting the health and well-being of our community by ensuring employee safety, developing creativity, and building a workforce to help our customers do their best to work remotely.

Ideas and solutions for COVID-19

Our business is rooted in creativity and values. Our employees are the heart and soul of the company. Sunrise will soon saw the creative response of our team, partners, and customers to slow the spread of the coronavirus, encourage action to protect the health of our community, and ensure that we are all based on facts and is not a rumor about a pandemic.

From the first hair dye shop created by McCann and L'Oréal at home, to "Stay Playful" of Martin Agency, to #TrashDayCostume of Chicago FCB, our agents around the world institutions are working with customers to raise their awareness of COVID-19 and the impact of the global economy **during COVID**

Sunrise Technology

Remote work

Sunrise recommends that all global employees do the same who can complete their work from home until the spread of the virus in the country where they work slows down. Technology plays a vital role in reducing the impact of COVID-19 on people and organizations, including helping people stay productive when they cannot work in person. In the global economy, Sunrise is ensuring that our employees and investors can work remotely without sacrificing collaboration, security, or creativity. Sunrise that employees continue to support our customers and achieve business goals together with children, pets, and family.

While they are doing this, we support our employees through continuous communication, virtual team meetings, and sharing tips about how each of us works during this time. This includes continuing to focus on our values of inclusiveness and diversity.

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Sunrise is a technology driven group which was born for value creation, it has been building key barriers since its establishment 7 years ago. With the AI-driven digitization, Sunrise's core digital technology has been reorganizing the entire industrial processes with higher cost-efficiency.



Through years of ultra high speed development, Sunrise Group has formed the strategic layout of A-B-C-D-E: A as Artificial Intelligence (artificial intelligence), B

Sunrise Technology

With large number of core technologies, solutions and services, the entire Internet ecosystem was strongly boosted and achieved the incredible rapid development. Internet applications bring not only excellent smart life experience, but also solid foundation for the digitization and intelligence of related industrial chains.

In the meanwhile, Sunrise Exploration Research Institute conducts forward-looking technology layout and new model technology research around the company's strategy, develops and applies new models for commercialization and globalization of technical services.



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WHY SUNRISE

As the parent group of Sunrise, Omnicom provide its wide range of marketing and client resources, as well as technical supports to ensure Sunrise's service satisfies customers demands. The headquartered of Sunrise is located in London, UK, responsible for group strategies in financial planning and business goals, establishing financial management and operational control, guiding personnel policies and cross industrial cooperation, as well as management in investor relations, social responsibility, supervise mergers and acquisitions.

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BUSINESS MODEL

Sunrise owns the world's leading one-stop cloud computing and data advantages. It reconstructed the supply and demand of media resources by reality, effectiveness, and continuation of digital marketing. There are two reportable departments in Sunrise group, namely the Integrated Agency Network (IAN) and the Constituency Management Group (CMG). IAN is composed of Amazon, eBay, Lazada, Rakuten.com, Sunrise Data & Digital, and few integrated digital companies. It will also report the results of the "Company and Other" group.

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LV.1 Wish

3% Commission
C\$ 10.00



LV.2 eBay

4% Commission
C\$ 5,000.00



LV.3 Walmart

5% Commission
C\$ 20,000.00



LV.4 Amazon

6% Commission
C\$ 50,000.00

THE EMERGENCE OF SUNRISE MODEL

In 2008, Amazon, eBay and other main E-commerce platforms implemented the seller rating system in four categories. Buyers can rate sellers in each of these categories from 1 to 5, with 5 being the highest score. Unlike overall feedback ratings, these ratings are anonymous; neither sellers nor other users knows how individual buyers rate sellers. In any of the four rating categories, merchants with rating under 4.3 rank low in search results. Therefore, merchants on e-commerce platforms must have a score higher than 4.5 in each category.

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BUSINESS TENDENCY & SUNRISE PLAN

The core technologies, solutions and services boosted the entire industry with incredible development, and billions of internet Apps bring not only excellent & smart life experience but also solid foundation for the digitization and intelligence of related industrial chains.

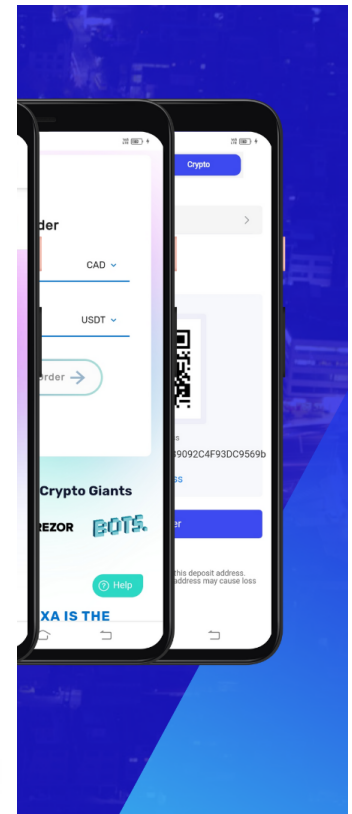


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HOW TO RECHARGE BY CRYPTO USDT-ERC20 TO SUNRISE APP



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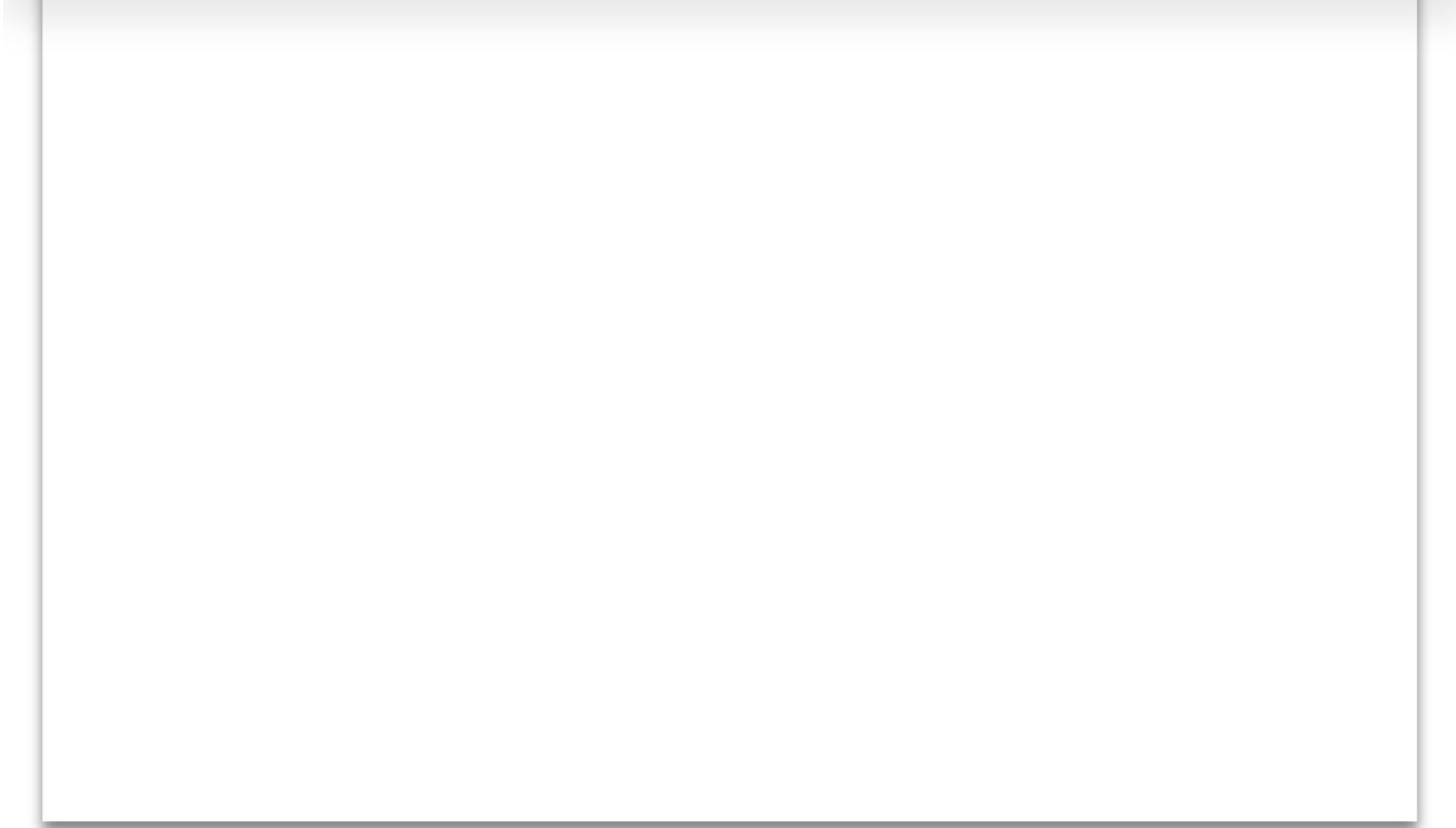
SUNRISE E-COMMERCE MARKETING MODEL LEADS THE WORLD

The Canada: With the rapid development of Internet e-commerce in recent years, e-commerce has become the global trend of economic development. More and more people are accustomed to shopping online. E-commerce industry has become the Sunrise Technology.

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Sunrise Post

COVID-19

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Model Of Sunrise



Sunrise Technology

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eBay

The World's Leading Global e-Commerce eBay, as the holding company of Sunrise, eBay provides assets as well as support to Sunrise to further guarantee that

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Recognize Sunrise Technology

Sunrise Technology originated from ebay Inc which is an American multinational e-commerce corporation based in San Jose, California as well as one of the world's

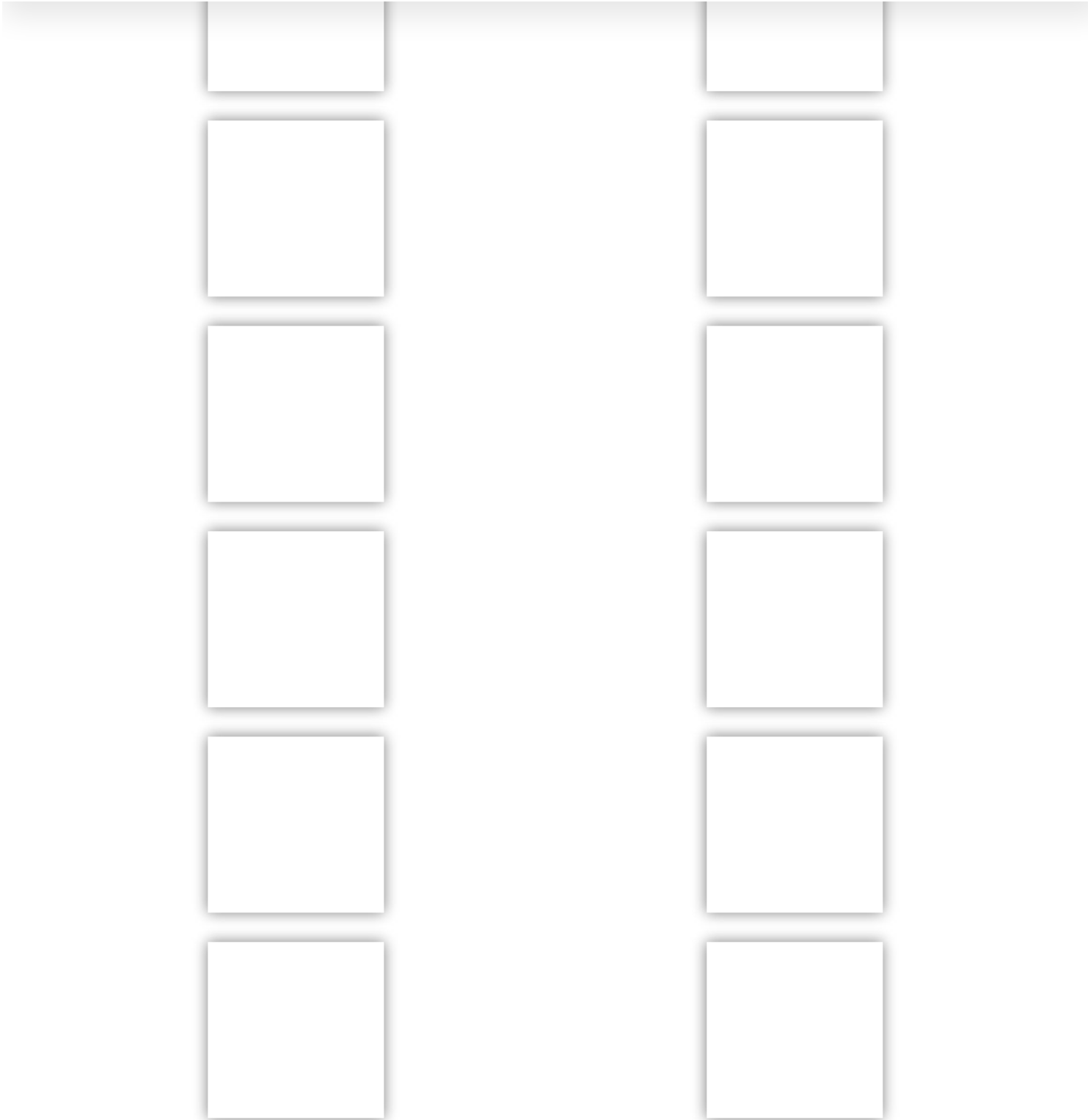
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COOPERATIVE PARTNER

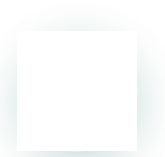


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The Emergence of Sunrise Model

Business Tendency & Sunrise Plan



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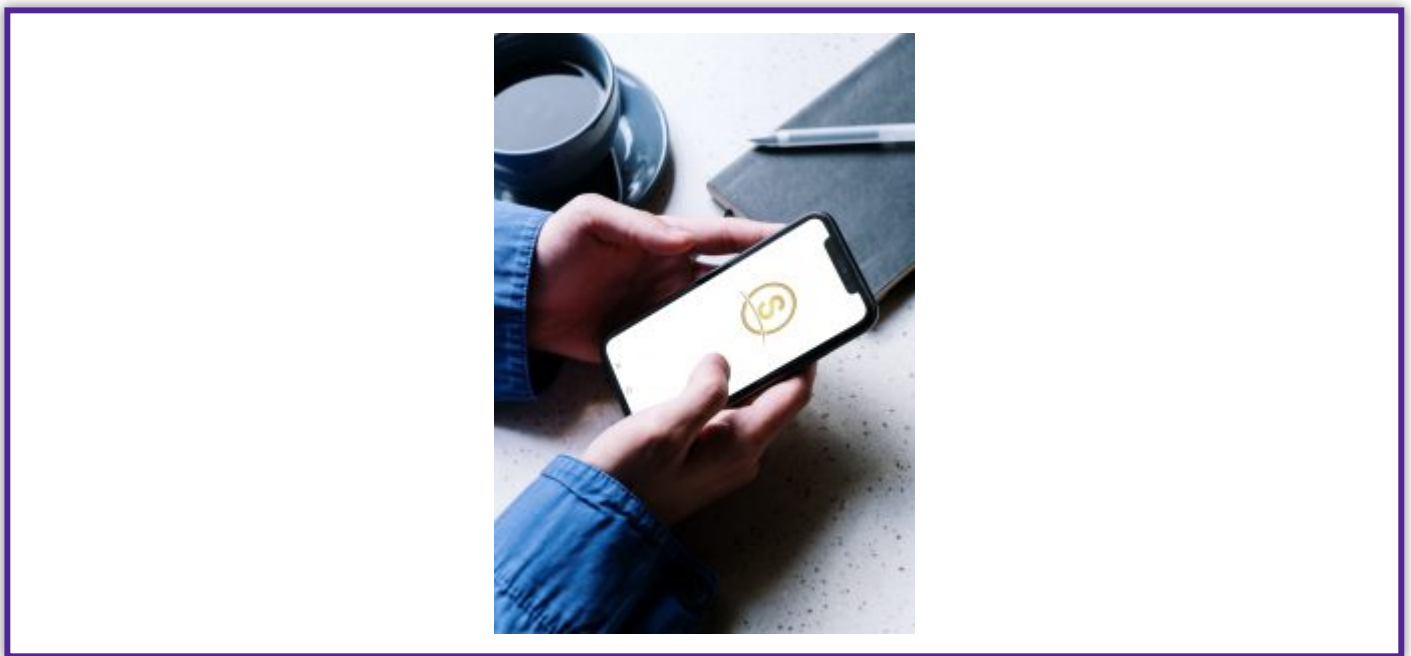


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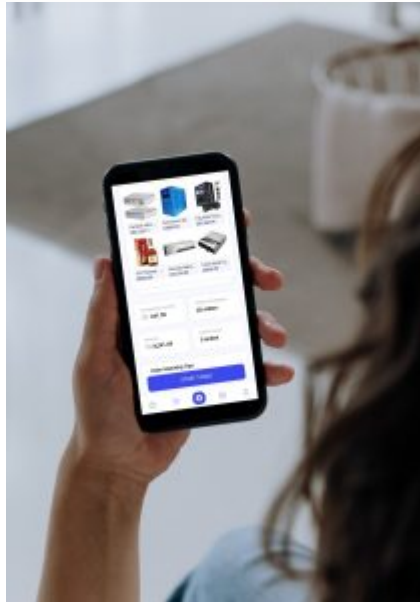
Sunrise leads the future of e-commerce technology

The Canada: Foundering Californian October 15, 2012, Sunrise is a leading global digital technology company specialize in gene commerce, cloud computing, advertising and marketing services. It has been in operation since September 1, 2016and has..

Sunrise Technology attaches importance to giving back to the society with public welfare while developing technology

The Canada: For a long time, Sunrise Tech not only adheres to the core technology-driven, customer-centered business philosophy and continuously innovates, creating value for users and partners, but also is keen on giving back to social charity.

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E-commerce innovation in 2021 will look like what was projected for 2025

In 2020, adoption of digital commerce has accelerated by multiple years in only a few months. Social commerce, evolution of omni-channel commerce, instore transformation, and headless services are e-commerce trends that will [shape the 2021](#)

The Future of eCommerce In 2021

At the start of a new year and a new years resolution is a real-time for reflection. Its grateful for you are already doing some, but not all of these activities. This New years decade is 2021. It is means, the revolutionary idea will [come...](#)

The boom of e-commerce in Covid-19 era

THE Covid-19 pandemic has forever changed the retailing industry, and one of the main shifts seen has been in the e-commerce sector, with stupendous growth just within a short time frame. Forbes noted that the pandemic accelerated e-commerce

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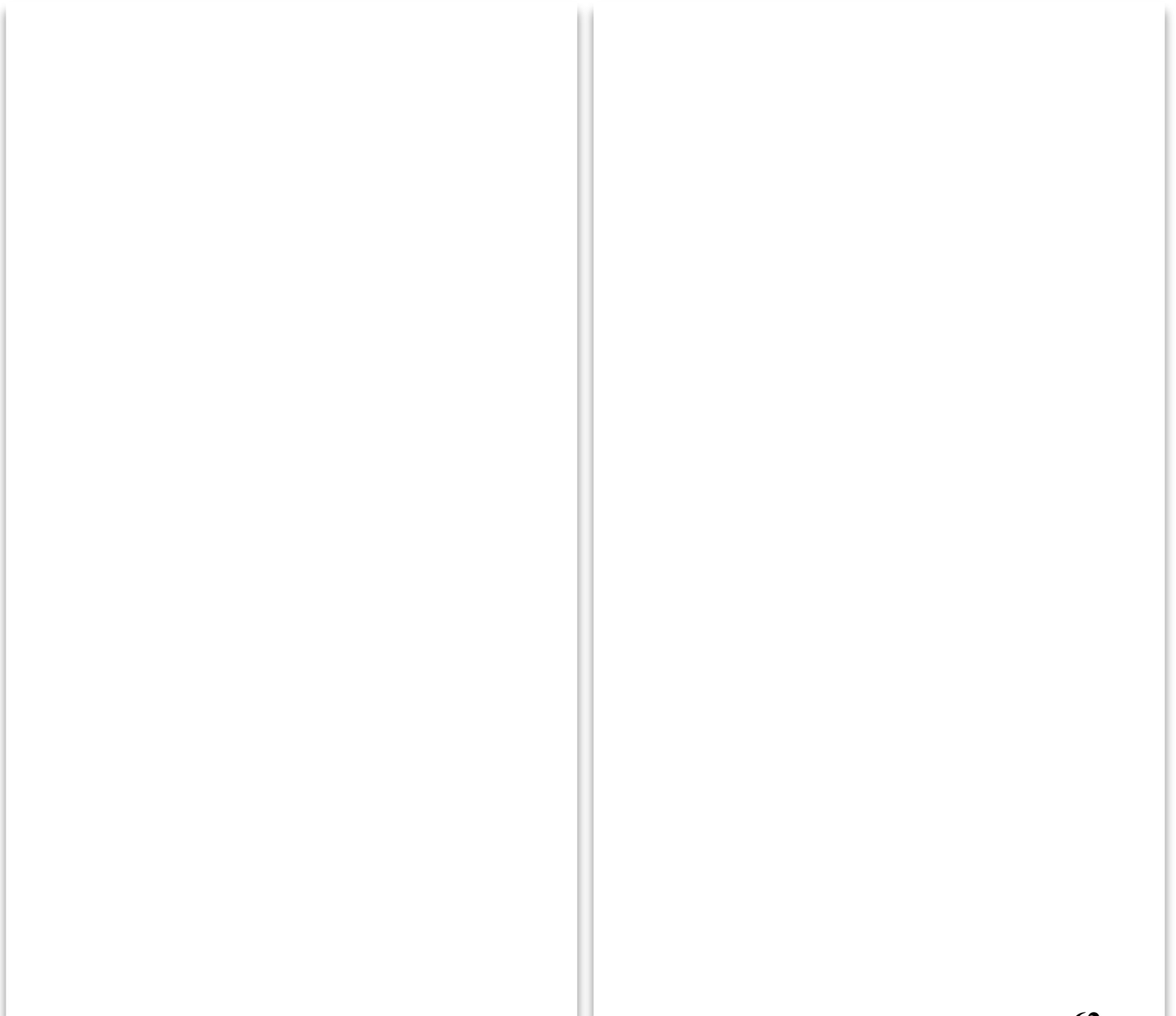
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LEARN ABOUT SUNRISE TECHNOLOGY

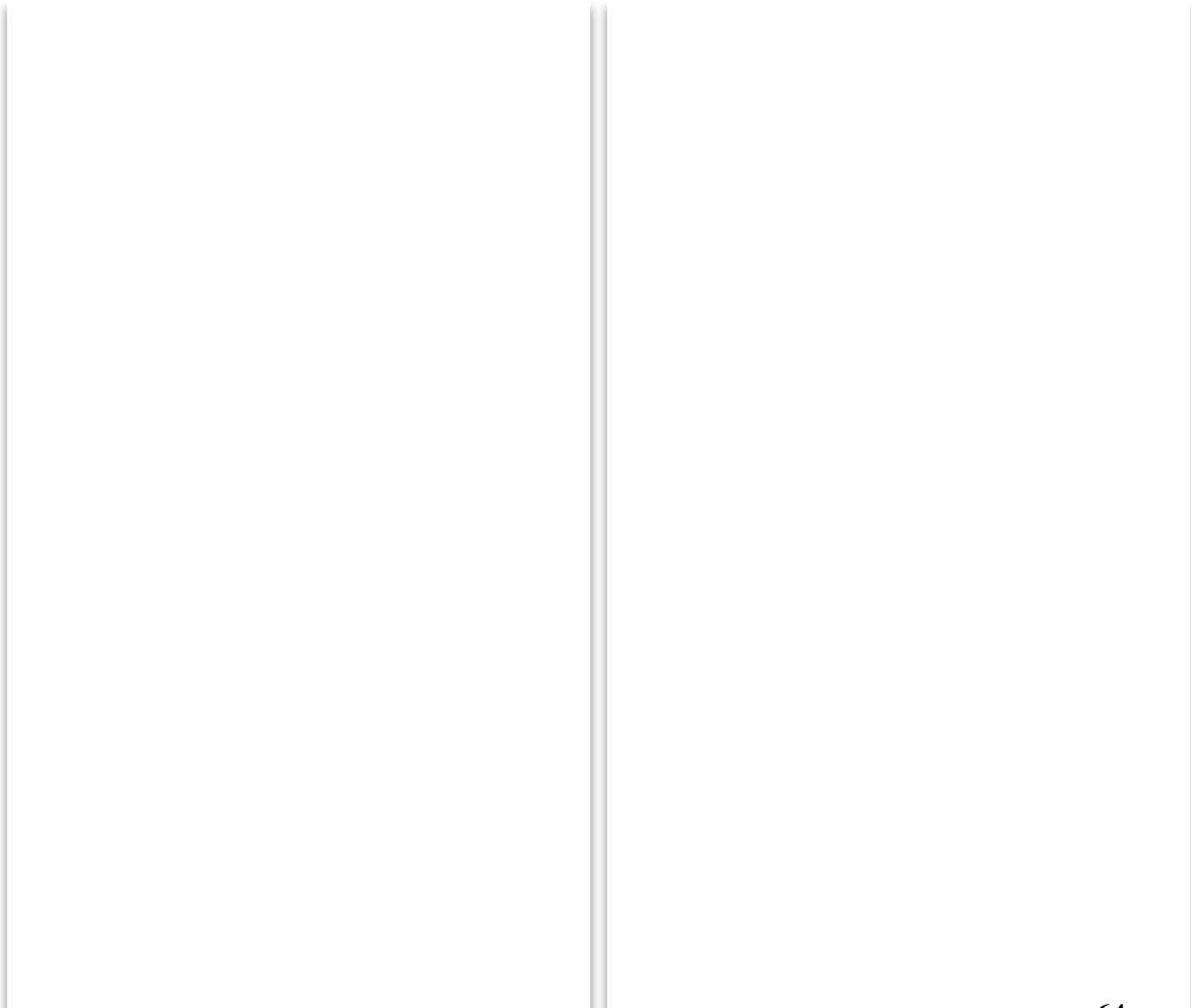
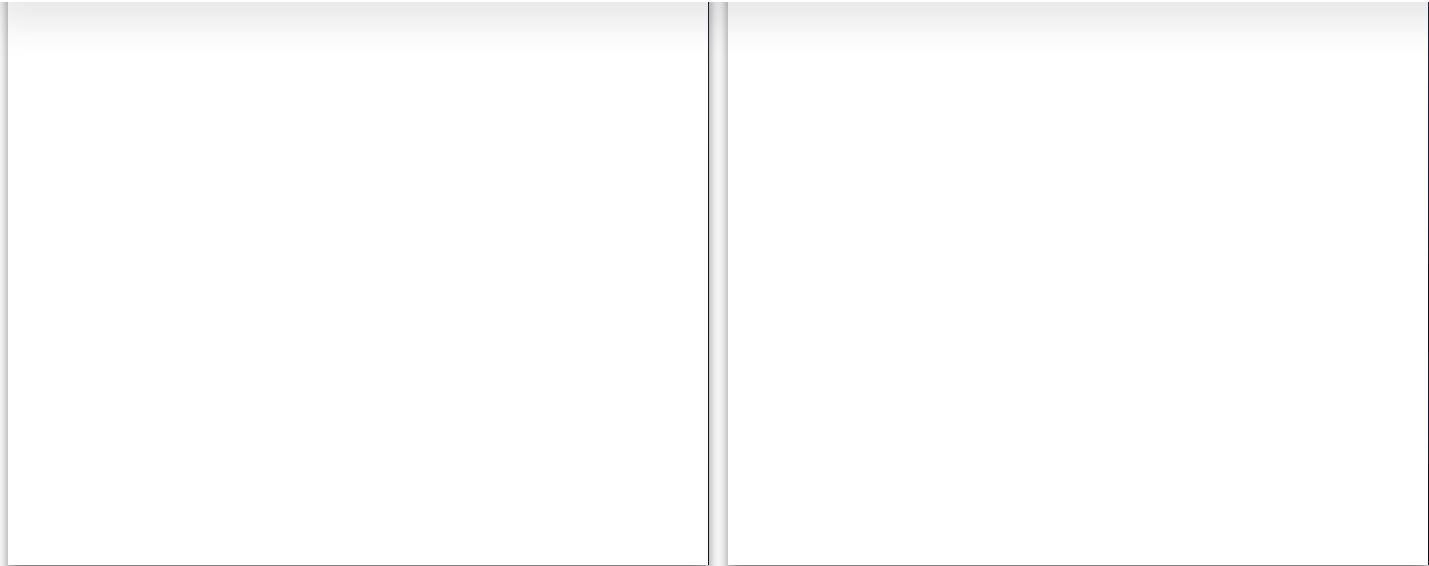


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Omnicom owns 5,000+ large scale clients in over 100+ countries around the world. Top E-commerce platforms are part of it and there are hundreds of millions products sold in thousands of categories every day. In this huge e-

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center, Sunrise data has been unique compared to other marketing platforms with advantages of real person, consumption, continuous and multi-screen.

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This is **Exhibit "B"** referred to in the
Affidavit of Jeffrey Wang, affirmed before me at the City of
Toronto, in the Province of Ontario, this 3rd day of December, 2021

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right, positioned above a horizontal line.

Commissioner for Taking Affidavits (or as may be)

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Sunrise Technology



WHY SUNRISE

As the parent group of Sunrise, Omnicom provide its wide range of marketing and client resources, as well as technical supports to ensure Sunrise's service satisfies customers demands. The headquartered of Sunrise is located in London, UK, responsible for group strategies in financial planning and business goals, establishing financial management and operational control, guiding personnel policies and cross industrial cooperation, as well as management in investor relations, social responsibility, supervise mergers and acquisitions.

 [Read More](#)



Sunrise Technology



Sunrise Technology



BUSINESS MODEL

Sunrise owns the world's leading one-stop cloud computing and data advantages. It reconstructed the supply and demand of media resources by reality, effectiveness, and continuation of digital marketing. There are two reportable departments in Sunrise group, namely the Integrated Agency Network (IAN) and the Constituency Management Group (CMG). IAN is composed of Amazon, eBay, Lazada, Rakuten.com, Sunrise Data & Digital, and few integrated digital companies. It will also report the results of the "Company and Other" group.

 [Read More](#)

Sunrise Technology



LV.1 Wish

3% Commission
C\$ 10.00



LV.2 eBay

4% Commission
C\$ 5,000.00



LV.3 Walmart

5% Commission
C\$ 20,000.00



LV.4 Amazon

6% Commission
C\$ 50,000.00

THE EMERGENCE OF SUNRISE MODEL

In 2008, Amazon, eBay and other main E-commerce platforms implemented the seller rating system in four categories. Buyers can rate sellers in each of these categories from 1 to 5, with 5 being the highest score. Unlike overall feedback ratings, these ratings are anonymous; neither sellers nor other users knows how individual buyers rate sellers. In any of the four rating categories, merchants with rating under 4.3 rank low in search results. Therefore, merchants on e-commerce platforms must have a score higher than 4.5 in each category.

 [Read More](#)

Sunrise Technology



Sunrise Technology



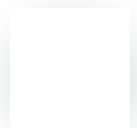
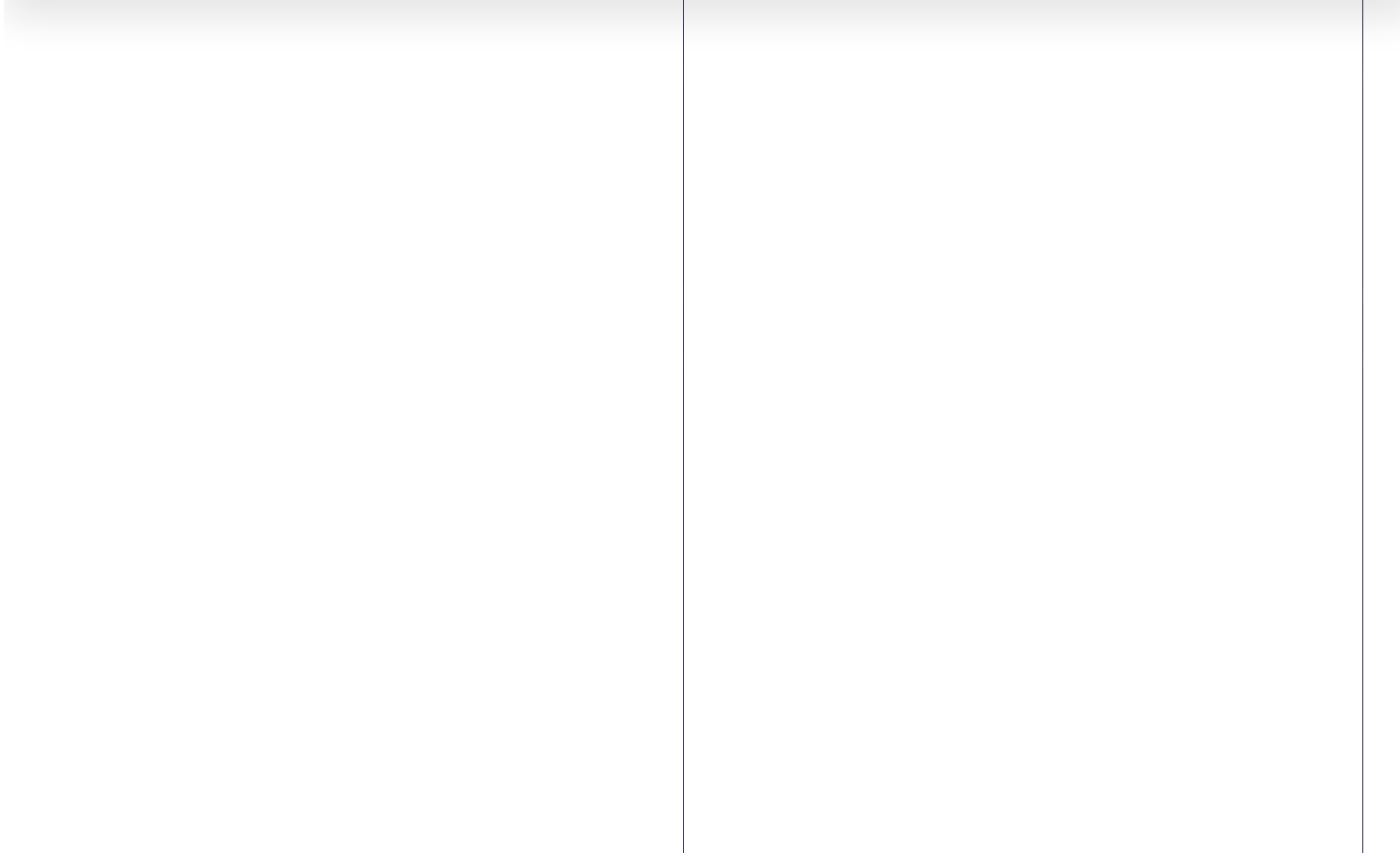
BUSINESS TENDENCY & SUNRISE PLAN

The core technologies, solutions and services boosted the entire industry with incredible development, and billions of internet Apps bring not only excellent & smart life experience but also solid foundation for the digitization and intelligence of related industrial chains.



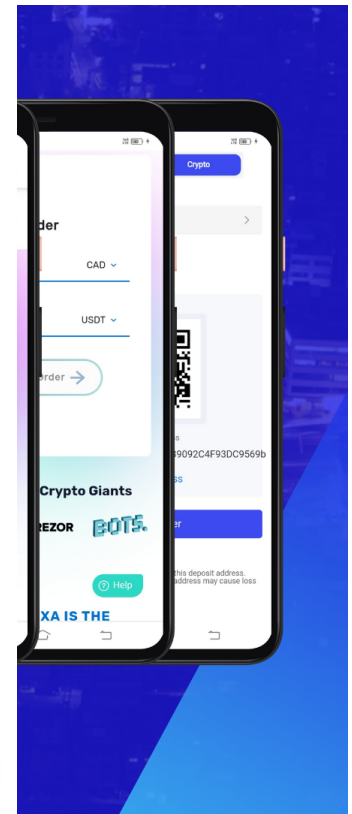
Read More

Sunrise Technology



Sunrise Technology

HOW TO RECHARGE BY CRYPTO USDT-ERC20 TO SUNRISE APP



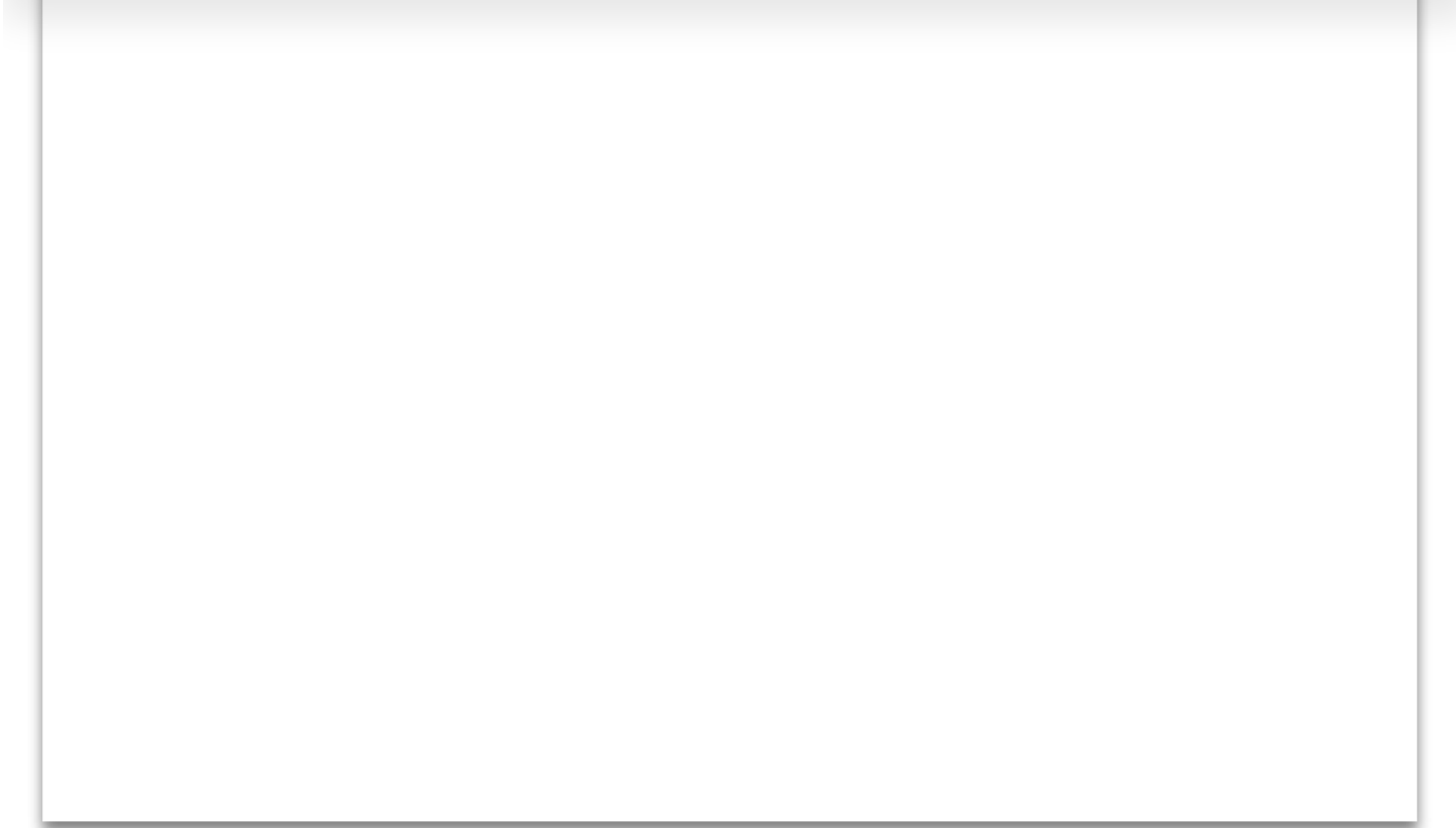
0:00 / 1:16

SUNRISE E-COMMERCE MARKETING MODEL LEADS THE WORLD

The Canada: With the rapid development of Internet e-commerce in recent years, e-commerce has become the global trend of economic development. More and more people are accustomed to shopping online. E-commerce industry has become the Sunrise Technology.

 Read More

Sunrise Technology



Sunrise Post

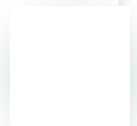
COVID-19

In the era of the epidemic: Sunrise to respond to COVID-19 together All Sunrise members will fight side by side with you to fight the

[READ MORE »](#)

2021-09-04 • No Comments

Model Of Sunrise



Sunrise Technology

[READ MORE »](#)

2021-09-04 • No Comments

eBay

The World's Leading Global e-Commerce eBay, as the holding company of Sunrise, eBay provides assets as well as support to Sunrise to further guarantee that

[READ MORE »](#)

2021-09-04 • No Comments

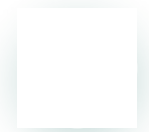
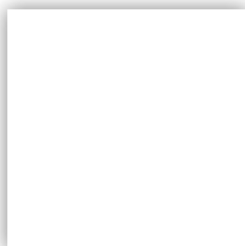
Recognize Sunrise Technology

Sunrise Technology originated from ebay Inc which is an American multinational e-commerce corporation based in San Jose, California as well as one of the world's

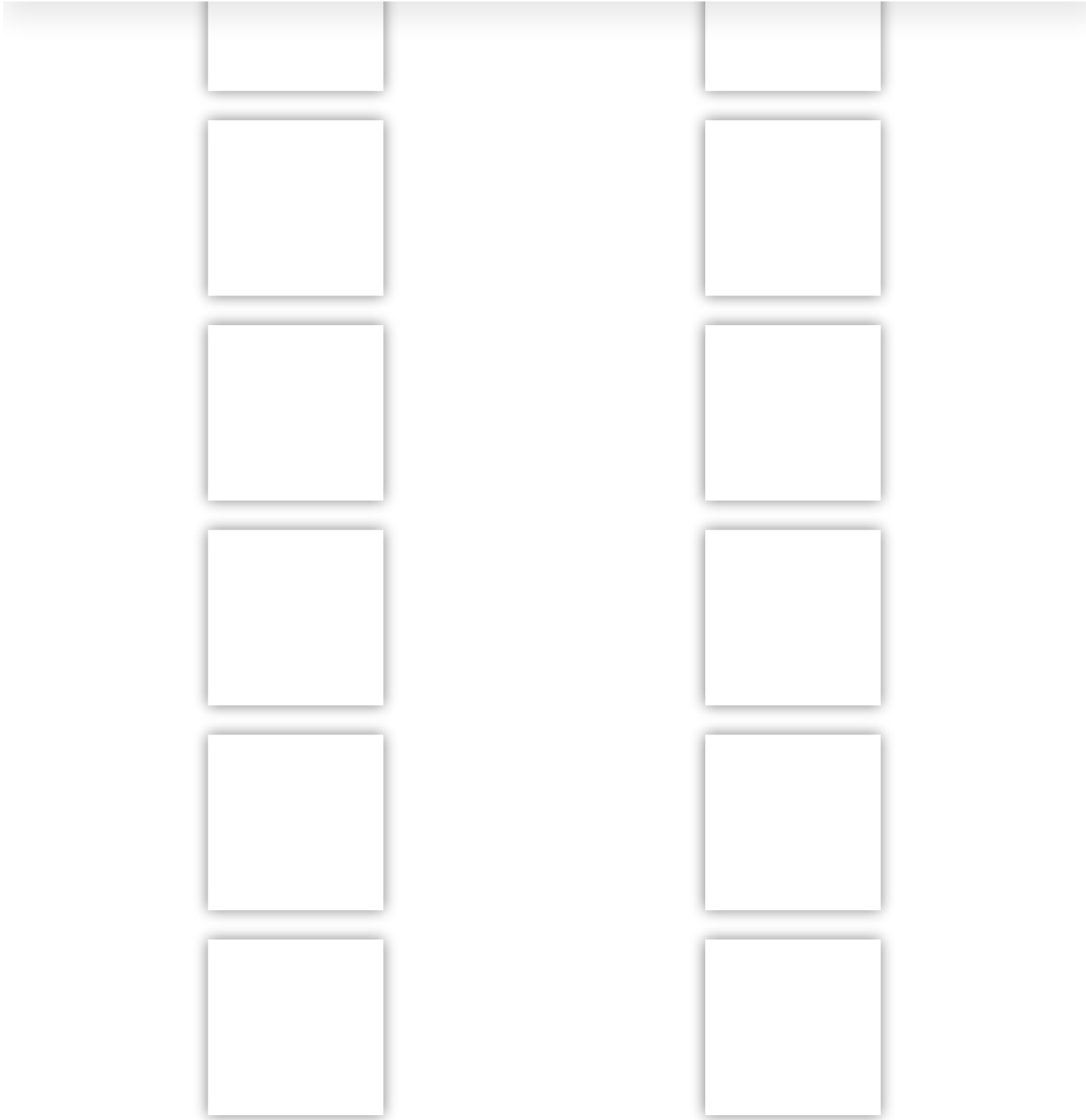
[READ MORE »](#)

2021-09-04 • No Comments

COOPERATIVE PARTNER



Sunrise Technology



The Emergence of Sunrise Model

Business Tendency & Sunrise Plan



Stay in Touch

Sunrise is a technology driven group which was born for value creation, it has been building key barriers since its establishment 7 years ago.

Mail Us



 support@sunrise-tech.ca



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Sunrise Technology



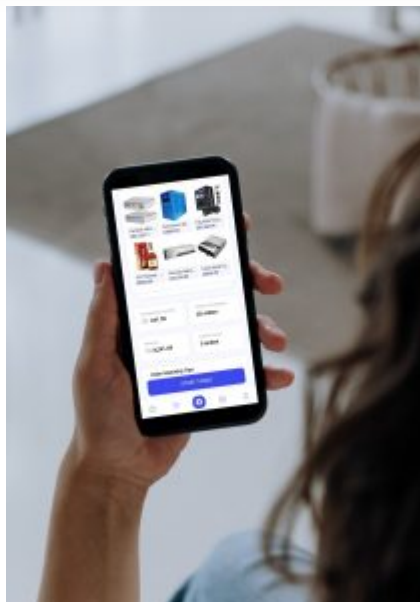
Sunrise leads the future of e-commerce technology

The Canada: Foundering Californian October 15, 2012, Sunrise is a leading global digital technology company specialize in gene commerce, cloud computing, advertising and marketing services. It has been in operation since September 1, 2016and has..

Sunrise Technology attaches importance to giving back to the society with public welfare while developing technology

The Canada: For a long time, Sunrise Tech not only adheres to the core technology-driven, customer-centered business philosophy and continuously innovates, creating value for users and partners, but also is keen on giving back to social charity.

Sunrise Technology



E-commerce innovation in 2021 will look like what was projected for 2025

In 2020, adoption of digital commerce has accelerated by multiple years in only a few months. Social commerce, evolution of omni-channel commerce, instore transformation, and headless services are e-commerce trends that will [shape the 2021](#)

The Future of eCommerce In 2021

At the start of a new year and a new years resolution is a real-time for reflection. Its grateful for you are already doing some, but not all of these activities. This New years decade is 2021. It is means, the revolutionary idea will [come...](#)

The boom of e-commerce in Covid-19 era

THE Covid-19 pandemic has forever changed the retailing industry, and one of the main shifts seen has been in the e-commerce sector, with stupendous growth just within a short time frame. Forbes noted that the pandemic accelerated e-commerce

Sunrise Technology



Stay in Touch

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Mail Us



✉ support@sunrise-tech.ca

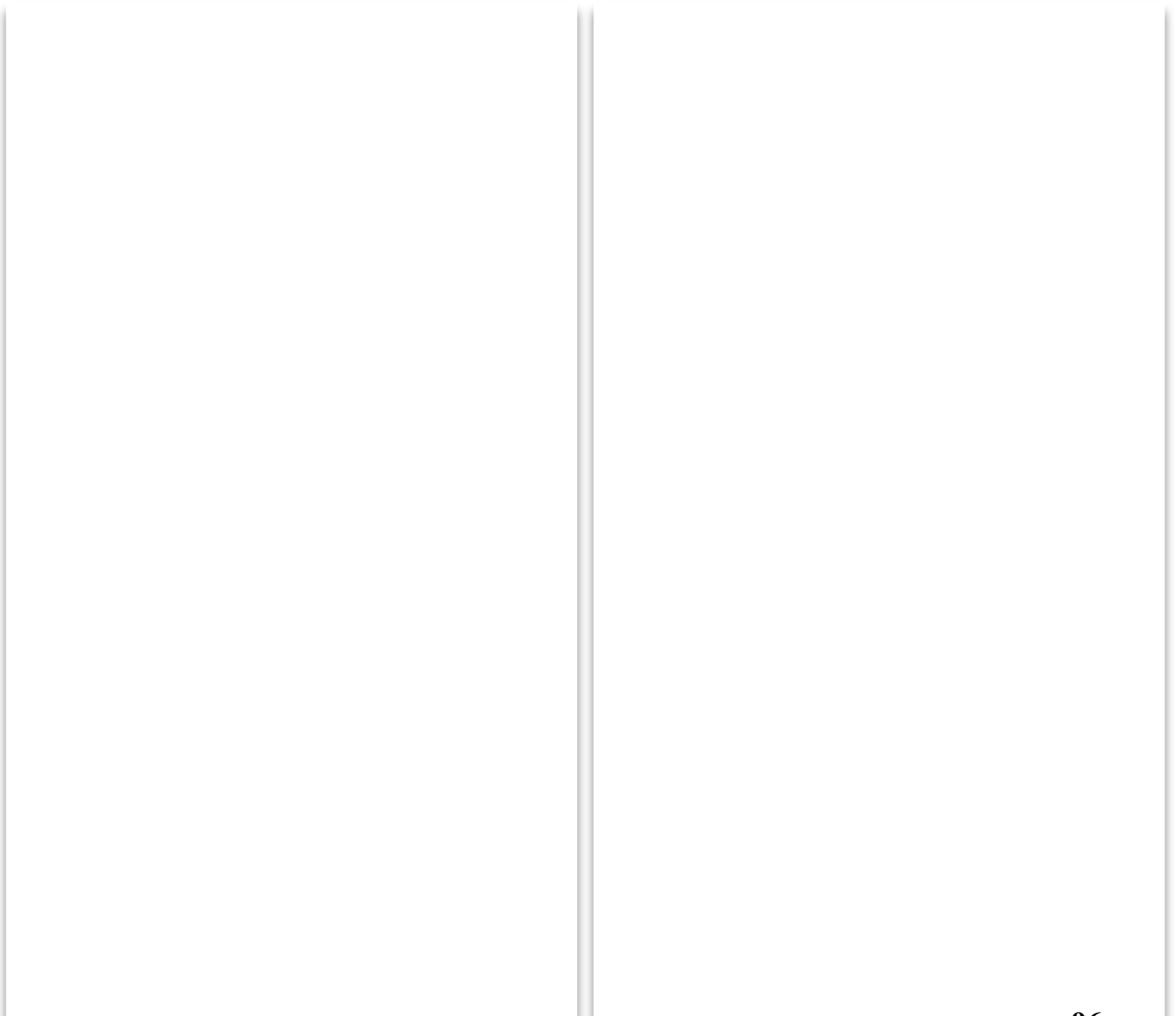
Sunrise Technology

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Sunrise Technology



LEARN ABOUT SUNRISE TECHNOLOGY

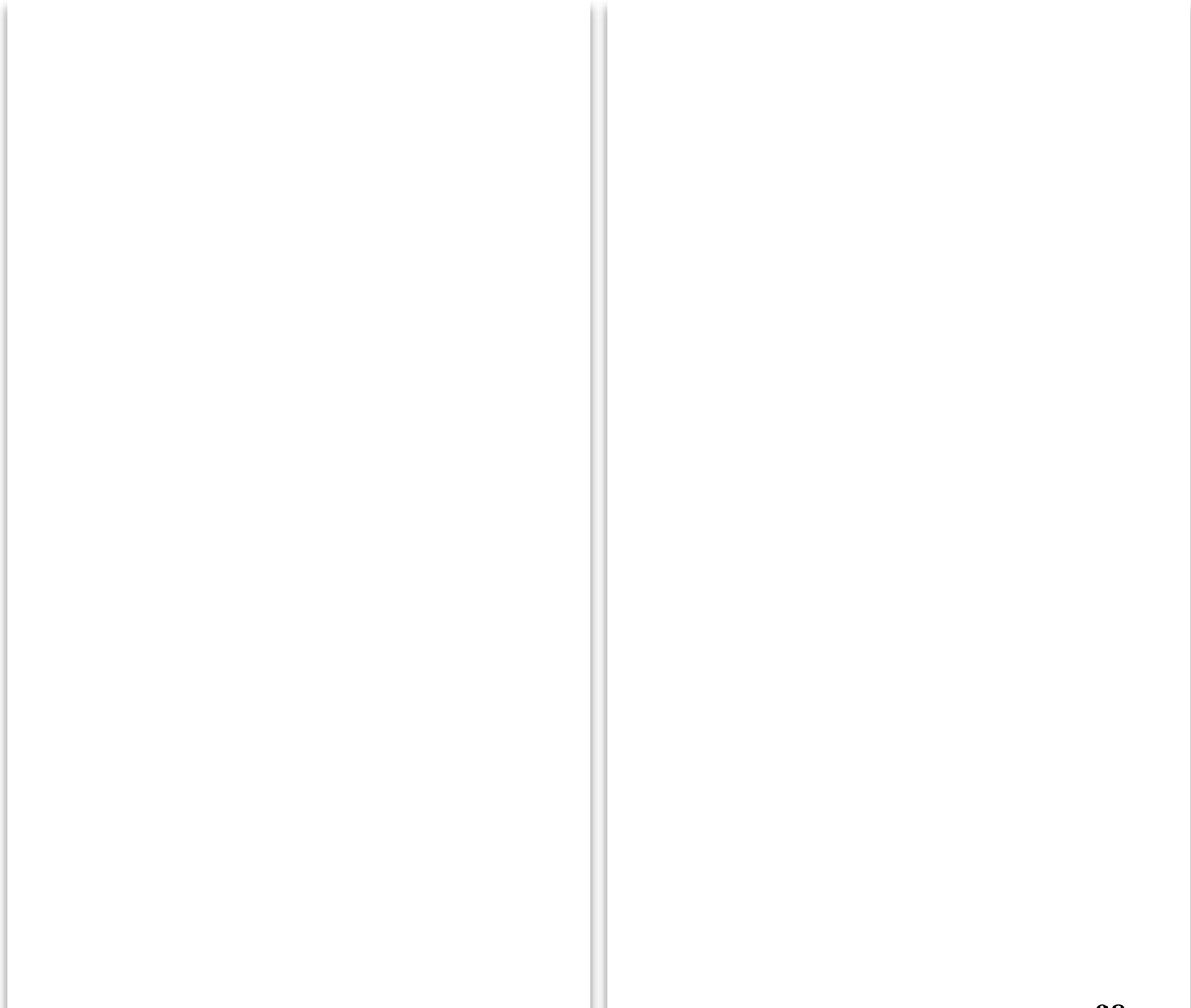
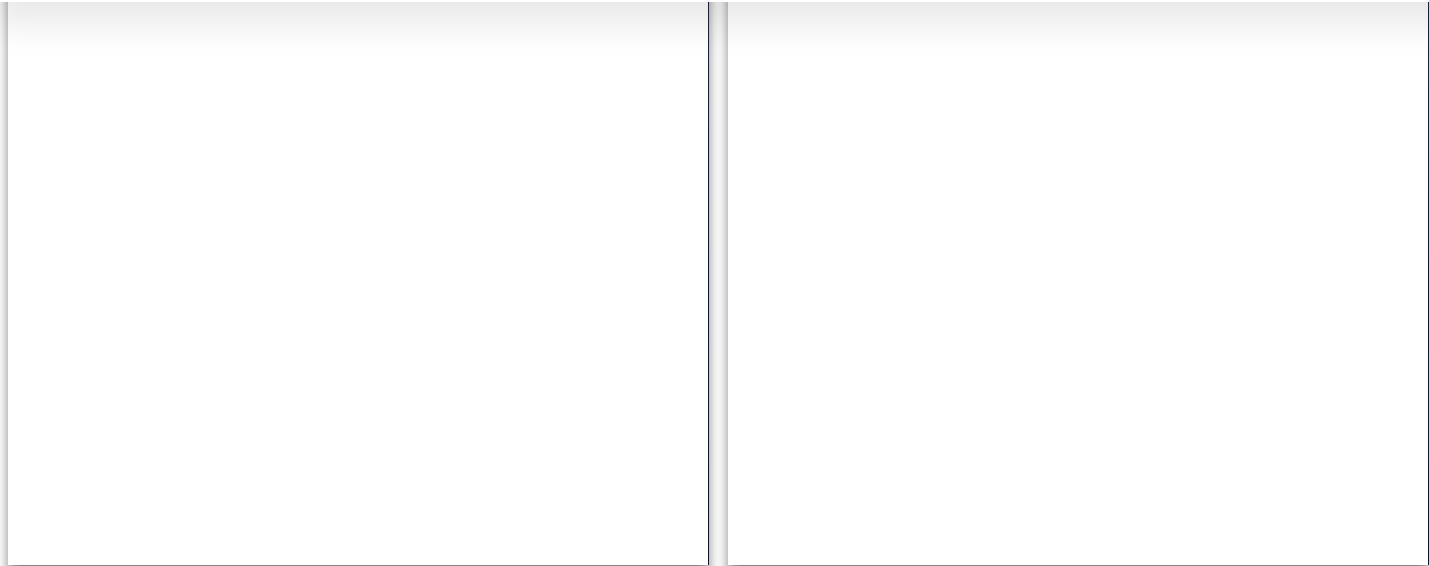


Sunrise Technology



0:00

Sunrise Technology



Sunrise Technology

Stay in Touch

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Mail Us



✉ support@sunrise-tech.ca



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Sunrise Technology



As the parent group of Sunrise, Omnicom provide its wide range of marketing and client resources, as well as technical supports to ensure **Sunrise's service** satisfies customers demands. The headquartered of Sunrise is located in London, UK, responsible for group strategies in financial planning and business goals, establishing financial management and operational control, guiding personnel policies and cross industrial cooperation, as well as management in investor relations, social responsibility, supervise mergers and acquisitions. In addition, the centralized functional services provide improvement of the company's operational efficiency, including finance and accounting, executive compensation management and recruitment assistance, employee benefits, information technology, marketing information retrieval and analysis, internal auditing, and legal services. Based on group's big data center, Sunrise is able to achieve the four elements of ideal marketing environment including precise audience, time coherence, open space, and complete closed loop, providing accurate and efficient marketing solutions for brands, merchants, and small and medium-sized enterprises.

Omnicom owns 5,000+ large scale clients in over 100+ countries around the world. Top E-commerce platforms are part of it and there are hundreds of millions products sold in thousands of categories every day. In this huge e-

Sunrise Technology

center, Sunrise data has been unique compared to other marketing platforms with advantages of real person, consumption, continuous and multi-screen.

Stay in Touch

Sunrise is a technology driven group which was born for value creation, it has been building key barriers since its establishment 7 years ago.

Mail Us



 support@sunrise-tech.ca



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This is **Exhibit "C"** referred to in the
Affidavit of Jeffrey Wang, affirmed before me at the City of
Toronto, in the Province of Ontario, this 3rd day of December, 2021

A handwritten signature in blue ink, consisting of a large, stylized initial 'J' followed by a horizontal line extending to the right.

Commissioner for Taking Affidavits (or as may be)

USDT 收款

扫二维码，转入 USDT



钱包地址

TYjR6xTaTxSoJkV3pfrwkTMiCwVTU2Re
w3



imToken
<https://token.im>





Bank Transfer

Crypto

Coins

USDT(1USDT≈C\$1.3000)



Network

ERC20

TRC20



Deposit Address

TYjR6xTaTxSoJkV3pfrwkTMiCwVTU2Rew3

[Copy Address](#)

Submit Order

Important Notice

* Please do not send non USDT coin to this deposit address. Sending any other coin or token to this address may cause loss of your deposit



USDT 收款

扫二维码，转入 USDT



钱包地址

0xF490769ec502fD7Fa0Cd49D39092C4
F93DC9569b



imToken
<https://token.im>





Bank Transfer

Crypto

Coins

USDT(1USDT≈C\$1.3000)



Network

ERC20

TRC20



Deposit Address

0xF490769ec502fD7Fa0Cd49D39092C4F93DC9569b

Copy Address

Submit Order

Important Notice

* Please do not send non USDT coin to this deposit address. Sending any other coin or token to this address may cause loss of your deposit



This is **Exhibit "D"** referred to in the
Affidavit of Jeffrey Wang, affirmed before me at the City of
Toronto, in the Province of Ontario, this 3rd day of December, 2021



Commissioner for Taking Affidavits (or as may be)

From: Yahoo <mangalagoonetilleke@yahoo.com>
Sent: Thursday, December 2, 2021 6:34 PM
To: Sunrise Application
Subject: Claim

Follow Up Flag: Follow up
Flag Status: Flagged

EXTERNAL SENDER

Hi
I have deposited \$500 with Sunrise platform and they have defrauded me of these funds.They have stopped all communications with the customers and not allowing us to withdraw money from the platform.The Sunrise App has stopped working too.Please serve justice to me and all other defrauded customers.
I have attached some screenshots of my details in this platform for your information.
Thank you
Mangalanath Goonetilleke

4:57

4G



Smart 5 (X657)...
C\$138.00



Sandtex VME -...
C\$57.60



Samsung Galax...
C\$116.66



Tricycle For Kids
C\$83.33



Baseus Car Inv...
C\$90.00



Wall Mounted...
C\$61.66

Commission Income

C\$ 40.50

Orders Completed

20 orders

Balance

C\$ 1,354.47

Orders Frozen

0 orders

Order Matching Tips:

(1) Order matching availability per day: 20 orders each account.

START TASKS

(3) Sunrise Smart Cloud matches orders instantly based on



web.thesunrisesp.club



My Account Details



Mangalanath Prasanna Bandara
Goonetilleke
mangalagoonetilleke@yahoo.com



* * * * *

Manage Payment Account

4:58

4G



Lalintha1

LV.1

ID:313247

Check-In

1,354.47

Balance

0

Wealth Boost

0

In Review

My Referral Code :

8DB8M6



Order Records



My Team



Events



Security



Referral Friends



Earn commissions with friends



History



My Account
Details



User Profile



Customer Service
Center



web.thesunrisesp.club

4:57

4G



Account History

Wallet Recharge Withdraw Orders Completed

Approved **300.00**
2021/11/04 23:32:43

Approved **200.00**
2021/11/04 01:29:31

-No more -

web.thesunrisesp.club

[Sent from Yahoo Mail for iPhone](#)

From: Darwen Jay Agujitas <d.agujitas@yahoo.com>
Sent: Thursday, December 2, 2021 7:58 PM
To: Sunrise Application
Subject: Proof of investment to Sunrise

EXTERNAL SENDER

11:32



Send Money



Confirmation

Your transfer has been sent!

REF #: 3921710777



From account

Chequing

8221731

\$469.17

To

Baoyingcao

baoyingcao1987@outlook.com

Autodeposit enabled



This transfer to 13364097 CANADA INC 13364097 CANADA INC(Baoyingcao) will be automatically deposited and can't be recalled.

Amount

\$500.00

Track this transfer

Check the status, view your transaction history or stop transactions in progress.



My accounts

New transfer

11:33



Send Money



Confirmation

Your transfer has been sent!

REF #: 3921709739



From account

Chequing

8221731

\$369.17

To

Baoyingcao

baoyingcao1987@outlook.com

Autodeposit enabled



This transfer to 13364097 CANADA INC 13364097 CANADA INC(Baoyingcao) will be automatically deposited and can't be recalled.

Amount

\$100.00

Track this transfer

Check the status, view your transaction history or stop transactions in progress.



My accounts

New transfer

9:35



Send Money



Confirmation

Your transfer has been sent!

REF #: 3916229169



From account

Chequing

8221731

\$789.18

To

Baoyingcao

baoyingcao1987@outlook.com

Autodeposit enabled



This transfer to 13364097 CANADA INC.(Baoyingcao) will be automatically deposited and can't be recalled.

Amount

\$200.00

Track this transfer

Check the status, view your transaction history or stop transactions in progress.



My accounts

New transfer

E-TRANSFER
103921710777 Baoyingcao

-\$500.00
\$469.17

9:25

LTE 



Account History

Wallet Recharge Withdraw Orders Completed W

Unreviewed 2021/10/19 10:21:54	100.00
Approved 2021/10/13 13:13:13	100.00
Unreviewed 2021/10/18 23:32:51	500.00
Approved 2021/10/12 22:07:46	200.00
Approved 2021/10/12 21:39:11	200.00

-No more -

I invested 1,000 CAD to sunrise and send the money to Mr. Bao Cao Ying..

From: elaheh a <azvancouver@gmail.com>
Sent: Wednesday, December 1, 2021 9:16 PM
To: Sunrise Application
Subject: Re: Sunrise

EXTERNAL SENDER

Following my last email,
I have attached a copy of my e- transfers and crypto transfer
Best Regards,

Elaheh Ayoubzadeh

1:17



Transfer Details



From Chequing
(00873-5002001)

Amount 2,500.00

To sunrise

Email wellpowerent@gmail.com

Notify Recipient By EMail

Through Online Banking

Sent Oct 30, 2021

Status Accepted

Transfer Type Autodeposit

Confirmation # 1943




Home


Accounts




Move Money


More

1:17



Transfer Details



From Chequing
(00873-5002001)

Amount 1,000.00

To sunrise

Email wellpowerent@gmail.com

Notify Recipient By EMail

Through Online Banking

Sent Oct 30, 2021

Status Accepted

Transfer Type Autodeposit

Confirmation # 7652



Home



Accounts



Move Money



More

To
sunrise
sunriserios123@gmail.com

Autodeposit enabled



This transfer to CHENJUN YE (sunrise) will be automatically deposited and can't be recalled.

Amount

\$200.00

Track this transfer

Check the status, view your transaction history or stop transactions in progress.



[My accounts](#)

[New transfer](#)

3:17



Withdrawal Details



Amount

4,500 USDT

Completed

Crypto transferred out of Binance. Please contact the recipient platform for your transaction receipt.

[Why hasn't my withdrawal arrived?](#)

Confirmations	50 / 1
Network	TRX
Address	TYjR6xTaTxSoJkV3pfrwkTMiCwVTU2 Rew3
Txid	<u>bdfd6a065ae4ef18ec79fe93f3657e9 bf47256ce97e474b9e3d723a632bcc 5ad</u>
Network fee	1 USDT
Date	2021-11-01 14:54:53

[Save Address](#)

1:37



Send Money



Confirmation

Your transfer has been sent!

REF #: 3927569075



From account



To

sunrise

sunriserios123@gmail.com

Autodeposit enabled



This transfer to CHENJUN YE(sunrise) will be automatically deposited and can't be recalled.

Amount

\$200.00

Track this transfer

Check the status, view your transaction history or stop



[My accounts](#)

[New transfer](#)

2:48



Account History

Wallet Recharge Withdraw Orders Completed W

Approved **2,500.00**
2021/10/30 00:14:18

Rejected **1,000.00**
2021/10/29 18:46:49

Approved **1,000.00**
2021/10/29 17:24:45

Approved **200.00**
2021/10/26 17:05:40

Rejected **200.00**
2021/10/25 13:40:22

Approved **200.00**
2021/10/24 20:00:32

-No more -

2:48



Account History

Completed

Wealth Boost

Deposit list

Withdrawal list

Approved

2021/11/01 14:56:05

5,850.00

-No more -

Sent from my iPhone

> On Dec 1, 2021, at 5:25 PM, elaheh a <azvancouver@gmail.com> wrote:

>
> Dear Polley Faith
> I have received the letter regarding "Notice of Interpleader Hearing to Receive Deposited Funds"

>
> Best Regards,

>
> Elaheh Ayoubzadeh
> 7788590975

>
>
> Sent from my iPhone

This is **Exhibit "E"** referred to in the
Affidavit of Jeffrey Wang, affirmed before me at the City of
Toronto, in the Province of Ontario, this 3rd day of December, 2021

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right.

Commissioner for Taking Affidavits (or as may be)

From: [Daniel Ricciardi \(Omnicom Group\)](#)
To: [Andrew Faith](#)
Cc: [Jeffrey Wang](#)
Subject: RE: Fraud Claim
Date: Thursday, October 28, 2021 2:54:50 PM

EXTERNAL SENDER

I took a look and can confirm that we have absolutely no affiliation and/or ownership in that company.

Daniel Ricciardi, Esq.
Associate General Counsel

Omnicom Group Inc.

P: (212) 415-3738

C: (917) 676-7989

daniel.ricciardi@omnicomgroup.com

From: Andrew Faith <afaith@polleyfaith.com>
Sent: Thursday, October 28, 2021 2:02 PM
To: Daniel Ricciardi (Omnicom Group) <daniel.ricciardi@omnicomgroup.com>
Cc: Jeffrey Wang <jwang@polleyfaith.com>
Subject: RE: Fraud Claim

Dan –

Thank you for getting back to me so quickly. I am tied up until later today, but in the meantime, please see this [link](#) to a webpage that will be self-explanatory. If you could confirm this information is false (I am 99% sure it is), I'd be grateful, but happy to discuss as well.

Andrew

From: Daniel Ricciardi (Omnicom Group) <daniel.ricciardi@omnicomgroup.com>
Sent: Thursday, October 28, 2021 1:25 PM
To: Andrew Faith <afaith@polleyfaith.com>
Subject: Fraud Claim

EXTERNAL SENDER

Mr. Faith,

My name is Dan Ricciardi and I am an Associate General Counsel at Omnicom Group.

I understand that you have a client who has been defrauded and that you believe that the person/group responsible might be impersonating one of our companies. This is obviously something that we take very seriously and I would like to understand the circumstances surrounding what occurred.

Please give me a call on my cell (917-676-7989) at your convenience.

Thanks,
Daniel Ricciardi, Esq.
Associate General Counsel

Omnicom Group Inc.

P: (212) 415-3738

C: (917) 676-7989

daniel.ricciardi@omnicomgroup.com

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This is **Exhibit "F"** referred to in the
Affidavit of Jeffrey Wang, affirmed before me at the City of
Toronto, in the Province of Ontario, this 3rd day of December, 2021



Commissioner for Taking Affidavits (or as may be)

From: [Daniel Ricciardi \(Omnicom Group\)](#)
To: [Andrew Faith](#)
Cc: [Jeffrey Wang](#)
Subject: RE: Fraud Claim
Date: Thursday, October 28, 2021 5:27:20 PM

EXTERNAL SENDER

Thanks for the information. We will obviously be doing everything we can to have the website taken down immediately.

How do you know the scope of the attempted fraud (>600 people and over \$1m)? Do you represent more than the one people you mentioned when you reached out?

Daniel Ricciardi, Esq.
Associate General Counsel

Omnicom Group Inc.

P: (212) 415-3738

C: (917) 676-7989

daniel.ricciardi@omnicomgroup.com

From: Andrew Faith <afaith@polleyfaith.com>
Sent: Thursday, October 28, 2021 5:23 PM
To: Daniel Ricciardi (Omnicom Group) <daniel.ricciardi@omnicomgroup.com>
Cc: Jeffrey Wang <jwang@polleyfaith.com>
Subject: Re: Fraud Claim

Thanks for this. I don't believe we need to discuss further, as your confirmation provides sufficient comfort. I would, however, recommend that you seek to have this website taken down (or at least that it remove the references to your company), as it appears to have been used by a Chinese-based impersonator in an attempt to defraud some 600 persons, mostly Canadians, of a significant sum of money (more than \$1 million by our current accounting). We of course acknowledge that Omnicom Group could have had no knowledge of or involvement in any of this. I would be happy to speak further should you wish to do so.

Andrew

From: Daniel Ricciardi (Omnicom Group) <daniel.ricciardi@omnicomgroup.com>
Sent: Thursday, October 28, 2021 2:54 PM
To: Andrew Faith <afaith@polleyfaith.com>
Cc: Jeffrey Wang <jwang@polleyfaith.com>
Subject: RE: Fraud Claim

EXTERNAL SENDER

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Daniel Ricciardi, Esq.
Associate General Counsel

Omnicom Group Inc.

P: (212) 415-3738

C: (917) 676-7989

daniel.ricciardi@omnicomgroup.com

From: Andrew Faith <afaith@polleyfaith.com>
Sent: Thursday, October 28, 2021 2:02 PM
To: Daniel Ricciardi (Omnicom Group) <daniel.ricciardi@omnicomgroup.com>
Cc: Jeffrey Wang <jwang@polleyfaith.com>
Subject: RE: Fraud Claim

Dan –

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Andrew

From: Daniel Ricciardi (Omnicom Group) <daniel.ricciardi@omnicomgroup.com>
Sent: Thursday, October 28, 2021 1:25 PM
To: Andrew Faith <afaith@polleyfaith.com>
Subject: Fraud Claim

EXTERNAL SENDER

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Thanks,

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Associate General Counsel

Omnicom Group Inc.

P: (212) 415-3738

C: (917) 676-7989

daniel.ricciardi@omnicomgroup.com

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This is **Exhibit "G"** referred to in the
Affidavit of Jeffrey Wang, affirmed before me at the City of
Toronto, in the Province of Ontario, this 3rd day of December, 2021



Commissioner for Taking Affidavits (or as may be)

广告位招租

416-915-5056
416-628-9108

【维多利亚教育集团】就业率最高'男神'刘杰老师
数据分析就业直通车



York Forum: Canada's first Chinese website!

約克論壇

下载约克论坛APP



Toronto 2°C

Today's oil price
134.9

CAD/RMB
4.97

请输入关键词

search

front page news Life travel Real estate car Yellow pages delicacy beauty Cloud class Sell a car
recruitment Activity discount Mall second hand

forum

My section: You are not logged in, please log in to view the favorite section

Station Service | Help

Talk about Investment and financial management Study abroad and immigration happy life Beauty parent-child Entertainment hobby
Irrigation Current al stock Financial management Study abroad migrant delicacy psychol Fashion Wedding Film and television computer sports pet
Broke the diary Taxation insurance Learn Business travel Purcha: cosmetic Yuesao music cell phone photography
make friends jin Exchange law Training English Hitchhike healthy Nursery Preschool ed Apple game gardening

Post title 请输入搜索内容

Advanced search topic Black Friday WeChat Group Dazhuo Electricity Subsidies Apple Discount Calls for Vaccines

Back to list 1 To the first Page Sure

New reply

View 528 | Reply 7

Trading company recruits ten part-time employees and international students are preferred.

atai9539

2021-10-15 02:01 | Show all | From YorkBBS iPhone App



focus Private
on 0 letters
attention fans
7 posts
Points 8
Register 2021-10-15
Status offline

1. Request to provide information to register the company to open an account.
2. Responsible for daily work related to tax reporting and accounting docking (once a month or half a year).
3. The accountant is responsible for registration and handling of legal business licenses throughout the entire process.
4. Treatment is based on monthly salary, or profit distribution.

Contact WeChat: USDTDUI

Like (1) report collect Quote reply



Forum hot posts

[Looking for a job] Formal takeaway companies are looking for market promotion, welcome international students,
[Looking for a job] Recruiting part-time game agent

[Finding a job] High-paying recruitment of consultants for study abroad, international students at school are preferred,
[Finding a job] Recruitment of HomeOffice part-time job-suitable for international students and white-collar workers

[Psychological Clinic] Dr. Wang Psychological Counseling Center (remote or on-site service available)

[Auto Repair] Hetai Automobile Maintenance and Repair Center Bayview& Ste

[Car Rental Service] Sincere Car Rental-Half price rent helps you "fight the epidemic"


[Moving Company] No hidden costs!!! Handling and unloading, commercial delivery

the co-operators 協邦保險

汽車 房屋 商業 人壽

Jason Wang

(416)-708-8829



focus Private

0 on 0 letters
attention fans

7 posts

Points 8

Register 2021-10-15

Status offline

2021-10-15 03:25 | Show all | From YorkBBS iPhone App 2nd Floor



Like (0) report Quote reply

atai9539



focus Private

0 on 0 letters
attention fans

7 posts

Points 8

Register 2021-10-15

Status offline

2021-10-16 18:54 | Show all | From YorkBBS iPhone App 3rd floor

up

Like (0) report Quote reply

atai9539



focus Private

0 on 0 letters
attention fans

7 posts

Points 8

Register 2021-10-15


Status offline

2021-10-17 01:28 | Show all | From YorkBBS iPhone App 4th floor

up

Like (0) report Quote reply

atai9539



focus Private

0 on 0 letters
attention fans

7 posts

Points 8

2021-10-17 11:56 | Show all | From YorkBBS iPhone App 5th Floor

up

Like (0) report Quote reply



Repo
sugg
ation



Register 2021-10-15
Status offline

atai9539

2021-10-17 14:10 | Show all | From YorkBBS iPhone App

6th floor



up

focus Private
on 0 letters
attention fans

7 posts

Points 8
Register 2021-10-15
Status offline

Like (0) report Quote reply

atai9539

2021-10-18 00:54 | Show all | From YorkBBS iPhone App

7th floor



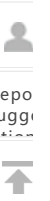
up

focus Private
on 0 letters
attention fans

7 posts

Points 8
Register 2021-10-15
Status offline

Like (0) report Quote reply



Report suggestion



◀ Back to list 1 To the first Page Sure

New reply



Advanced editor

You currently are tourists, please Login | Register

Reply to post

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留学移民

加拿大留学移民第一品牌
免费高中转学! 免费College申请!
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1-647-797-3195



Jason Zhang Scotiabank
scotia bank 房屋贷款专家
中文热线: 416-878-6918



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Recruiting foreign students or Chinese registered company for cooperative trade

Posted 2 months ago  report  collect

 3  0  0  70

Detailed description

Due to the epidemic, it is impossible to log in to the local registered company. Now recruiting overseas students or Chinese in Canada to cooperate, it is required to be able to register the company.

WeChat: USDTDUI

Comments 0 comments

Tell me your opinion...

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142

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 Assembly and disassembly workers Location: Vaughan Job type: Full-time Salary: Negotiable Main responsibilities: Assemble the motor and paint the motor. Two shifts:...
- 
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4 hours ago

Advanced Skytech Canada Ltd. has established a computer translation in Canada since 2005...

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Canadian Information Network is a more professional Chinese classified information network in Toronto. Providing free publication and inquiry of housing rentals and sales, job recruitment, second-hand goods, vehicle sales, life yellow pages and other practical information and business search in Toronto, Canada Information Network hopes to become a life platform that can serve the majority of Chinese people.

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This is **Exhibit "H"** referred to in the
Affidavit of Jeffrey Wang, affirmed before me at the City of
Toronto, in the Province of Ontario, this 3rd day of December, 2021



Commissioner for Taking Affidavits (or as may be)



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Brian Jacob

November 9, 2021



22

If i could just get my money i would rate 5 stars. There has been technical difficulties in the transaction system for weeks. I have personally been waiting 10 days to recieve my withdrawal, which I badly need to pay for expenses. (If you include withdrawal attempts that were cancelled, that's actually 15 days). I get that when updates, upgrades and maintenance are happening you need to be patient, but this is beginning to affect people's lives at this point. I know I'm not the only one.



Yollie Wells

November 15, 2021



2

the apps have been crashing lately, I don't know why I hope they'll fixed it asap ,I don't want to missed my tasks . I Uninstalled it and reinstall it again but still it doesn't open even when I go to websites . It's frustrating



Joanne Leblanc

November 27, 2021



App is a multi-level marketing scam.. Off the money you invest you click on 20 ads a day and generate income from that. It goes by the amount you invested. You never see that income nor the funds you put in. I put in \$750.00 and tried to withdraw some money after 2 months. No response from them for 2 weeks now. They have lured many people in. This app is still up so they can go scam a different group of people. They have been reported yet app is still up. Customer service is broken english



soul soul

November 8, 2021



19

This is a scam, do not put your money in it, the will pay you your first withdrawal, so that you will believe it's legit, then you will put more money and convince more people. Your second withdrawal will remain in review until the app crashes.



Moses Ben Israel

November 12, 2021



Fantastic absolutely wonderful the best thing since sliced bread what the app could be more reliable and stable but I'm sure they're working on it!



S J

November 21, 2021



1

Customer support sucks, they pretty much told me I'm not important. I would not advise us

ing this app. Maybe I'll change my rating once or if I get my withdrawal from them. All the 5 star reviews are fake.



K K

November 27, 2021



1

It is scam do not put any money in it. I never got my money back forget about about that 3% commission. They will not reply to any of my messages there is no office nothing is legit. So do not blindly trust them Like I did.



Abiel Kahssu

November 23, 2021



4

Hello everyone this app is 100% scam. I wish I knew early about this app but unfortunately I lost some money already. Please be careful do not put any money. Me and other groups are in process of reporting to authorities about this app misleading people.



Mr Nice guy

July 22, 2021



23

Well it has potential to be great however 50 dollars minimum to recharge balance is kinda much why is it I can't add lower amounts. For an app with no reviews and seems really new I'd think you need to build trust with people and not expect steep amounts to new levels and recharge. Giving the people

[Full Review](#)



Mike Jones

November 27, 2021



2

Total scam me and my mom lost \$3700 all together and we are poor to begin with pretty sad after i recruited a bunch of people and no one gonna see there money. We notified the antifraud of canada and there is police investigating them so hope we can catch these people. There more people that report them the better chance we too catch them.



Gally

November 4, 2021



10

App was working fine for a month then just crashed. I lost 500 bucks. This is a scam.



ag de

November 27, 2021



This App is a scam and shame on google and apple that although it's been reported to them many people have lost their money because of this scam they still havd not removed it and let more people loose thier money



wajid gamer

November 17, 2021



4

Don't download or sign up, its fraudulent company, I have invested over 10k, since I haven't get money back yet,



SALEM GAMING hd

November 28, 2021



1

Guys it's a scam don't put your money luckily I just lost 1 thousand, but unfortunately my friend lost 20 thousand.



arlyne Letha gray

September 29, 2021



1

Simple operation and easy to use



Morton Barns

September 30, 2021



2

Simple and practical without ads



savannah lisa

September 29, 2021



2

Very easy to use and very satisfied




cory peters

November 25, 2021






2

- DO NOT USE THIS FAKE APP, I SERIOUSLY LOST THOUSANDS. APP NEVER PAYED ANYONE. EVERYONE LOST THIER MONEY.
- 

Alfonzo Bookout
August 27, 2021


I've been using this app since it's release, very good, timely revisions, and innovative




5


- 

Layeequddin Mohammed
November 8, 2021


Absolute garbage. SCAM. SCAM. SCAM. SCAM. BEWARE.




10


- 

yazmin bove
September 29, 2021


Very easy to use, good software






- 

Glory Bullard
September 1, 2021


I changed a mobile phone before, but I still use it now, very good.




2


- 

moriahpa felicity
September 29, 2021


Functions are getting better and better.






- 

Vahid Hojjat
November 10, 2021


This site is a scam. This is a pyramid scheme. Be careful.




8


- 

Warneri Nelmsl
September 29, 2021


Very powerful, easy to use and support




1


- 

Lily Isla
November 9, 2021


It's really good for everyone to earn money 💰💰💰




1


- 

Arnold Rejoso
November 25, 2021


Do not dare to use this app i know you wanted to get rich fast but in the end they will not give your money you end up broke the only thing they give are pain and suffering. Give me back my Money!!!




4


- 

Sophie L'Ecuyer
November 15, 2021


always something with logging in the app . im always installing uninstalling the app and even website isnt stable to get on . gotta wait till my friend gets a link for me to get on and do my 20 tasks .. annoyed




2


- 

Majidhz Hajizadeh
November 22, 2021


This is the fake software and they have not pay money back. Do not waste your money and time.




3


- 

Rob Barcenass
September 29, 2021


Simple and smooth operation, very good






- 

Dustin Michaluk
November 2, 2021


App crashes. Thinkings this was a scam. Thank got its only \$50 lost




5


- 


Jeronica Kierston Lonetta Javoris
September 29, 2021


Really good, good software.




- 

Raschad Jentgens
September 26, 2021


1



- d

Software is good, this should be full score, but some functions do not need to be too flashy.
Pure personal opinion

1
- T

Tee Bars
November 13, 2021

IT IS A BIG SCAM, I alongside my friends invested over 20k Canadian dollars on this app, but none of us was able to withdraw our money till today, they kept saying their financial department is working on it and now it's over 3weeks. The chinese names the scammers used to receive money from unsuspe

Full Review

12
- K

Kiylee Priscott
September 26, 2021

I've been using it all the time. I feel it's more convenient and stable. I seldom flash back. I hope it will get better and better.
- k

koloski schaefer
September 29, 2021

Easy to use, the better it gets!
- H

Herrera Jakobsen
September 26, 2021

Apple IOS WP experience is very good, the only three platforms experience the same good application
- f

frankfr massey
September 29, 2021

Very practical, like it!
- S

Samone Judson
September 26, 2021

Originally thought it was a very rustic app, but it's really practical. It's really good
- C

Cardona Stokley
August 27, 2021

This application is really easy to use.
- Nabeel Khan**
October 8, 2021

Don't know its real or fake but if its real then its amazing
- Colours of Life**
September 20, 2021

Very bad experience. Its scam. 3days ago i was withdraw my balance. Still i Didn't get my money. Please don't wst your money.

19
- W

Weber Melanie
September 30, 2021

So thorough and getting better
- M

Manveer singh sambhi
November 21, 2021

This is a big scam don't put your hard earned money

2
- GamingFC**
October 17, 2021


Seems a great app so far, I hope it will help me to earn money
- A

Armando Ferguson
August 27, 2021



Not had very easy to use


1

not bad, very easy to use.



- 


Dearth Millsaps
August 27, 2021



Recommended by a friend! Not bad
- 


Michalik Bise
September 1, 2021



I'm picky. I don't have to be picky
- 

anthony noah Samira
September 29, 2021


Very easy to use software.
- 

Ghirmay Tesfay
November 21, 2021







3

This App is Scam. They have scamed many people by pretending to be a legit company. Don't invest your money into this, otherwise you will loose your money. They are not with Omnicom Europe Group, but they say they are. They don't have physical Address where you can get your money.... They are about



Full Review
- 


Esteban Gerth
September 30, 2021



Really good software!
- 


Rood Marcus
September 1, 2021



Friends are in use, download, not bad
- 


Mitchel Fairbank
September 1, 2021



Easy to use, download it quickly
- 


ramona adela
September 30, 2021



Updated the new version for better use
- 


natalie adonis
September 29, 2021



To be honest, it really works!
- 

Walton Johansen
September 26, 2021





There is still room for improvement, if you can buy it yourself
- 



Fargo Vip
August 25, 2021





2



oh god! finally i get a real platform to get some extra income. i hate fulltime job. So far its a great platform for earnings.
- 


Vaughna Malafe
September 26, 2021



I like it. It's almost a habit to come and have a look every day
- 


Ki yareli
September 29, 2021



A little better than other software
- 

Schultz Mma
September 26, 2021





















The app has been running steadily for a long time
- 


















2793 Ily
September 27, 2021


The new interface design is very good

- **Jeremy Ventura**
September 30, 2021
Ok! Very functional
- **Maral Keshavarzi**
November 21, 2021
SCAM.SCAM.SCAM.SCAM Has been reported to police.
- **Keylly Kiggel**
September 26, 2021
The new version is a little slow to load
- **Nickelson Christi**
September 1, 2021
So many people are using it. It's really easy to use
- **Rhodes Thorsen**
September 1, 2021
It's a good evaluation after watching so much
- **White Rogers luna**
September 29, 2021
Very nice artifact even like
- **Huffman Cathcart**
September 17, 2021
Fun fun I like it. Wish it was real money
- **Willilams Lorina**
September 1, 2021
Drop by drop, it starts well
- **Carlaysia Laughren**
September 17, 2021
Great graphics Great graphics! Fun app!
- **Andrea Mclemore**
September 29, 2021
Good software, free
- **Michael Henry**
November 25, 2021
Do not download this app this app is a full-out scam and these people are taking everybody's money around the world and not given them the money so please do not download this app
- **lovehe nichols**
September 30, 2021
Software is great! I like it!
- **Jadiel Savanah**
September 1, 2021
OK, much better than the same type of app
- **Les Hosley**
September 29, 2021
Many more features than others
- **Gonzalo Bugg**
September 30, 2021
Freshness still exists.
- **marlaky will**
September 29, 2021
It's a must-have for installation
- **Westerberg Frandsen**
September 1, 2021






-  **Jared Ming**
September 29, 2021
Excellent app to like
-  **dottyoyetr bmfkj**
September 29, 2021
Very good! So friendly!
-  **Todd Vel**
September 26, 2021
The interface is much better than before
-  **christopher necrophos**
September 29, 2021
Easy to use ,,,,,,
-  **McGinnis Alisha**
September 1, 2021
good! So easy
-  **randi jaylyn**
September 29, 2021
very useful! Great
-  **Zaakir Gant**
September 26, 2021
Easy to use, convenient
-  **Warren jennifer Ronin jacob**
September 30, 2021
New content, very few
-  **volkath bae**
September 29, 2021
Very good and powerful
-  **Whitaker Carla**
August 31, 2021
Currently a very popular software, like
-  **Brannen Jonathon**
August 31, 2021
Very promising applications
-  **Randisha Farrears**
September 26, 2021
The first time I use it, it's not bad, others are experiencing.
-  **Aminda Shawndrea Brittany**
September 29, 2021
Not bad, like it ~
-  **Shanell Guillen**
September 1, 2021
Now popular soft armour, like one
-  **FLEX Gospels**
November 6, 2021
These app is a scam, please 🙏 everyone beware I beg of you. Thanks.
-  **kenda parenl**
September 29, 2021
Best application, good
-  **darine Tetreault**





- 


August 28, 2021



I have been using this and I feel very good.
- 


Chinn Rose
September 1, 2021



It's not fussy. It's good
- 


Liam Lera
September 1, 2021



Good! Give it to super five
- 


Fortney Spain
August 31, 2021



I'm quite satisfied with this one
- 


Cinthia Flanagan
September 1, 2021



It's fun. It's climax
- 


Balls Naples
August 27, 2021



Not bad, it's worth a try.
- 


Lamonica Leandra
September 1, 2021



Good. You can have a look
- 


Perry Maeve
September 27, 2021



It refreshes almost every day
- 


Swiercz Almira
August 28, 2021



Downloaded and looked good
- 


Joice Cummins
September 17, 2021



Very enjoyable relaxing app.
- 


Laqwanda Darey
September 26, 2021



A very good practical software
- 


Anissa Lamothe
August 27, 2021



It feels good to use it all the time
- 


tamitty fegyu
September 29, 2021



Really good haha
- 


Sidak Kamboz
November 30, 2021



Its a scam they did a scam with every one
- 


djs
November 9, 2021



How do i get the invitation code for signing up
- 

Bobby Martin
September 17, 2021





Exciting, great graphics
- 

Girouard McComb
September 1, 2021







Good free software

- 




brittany leona
September 30, 2021

A feeling of height



- 




Levi Shelby
September 1, 2021

Can't miss the software!



- 




Porter Toan
September 26, 2021

Really good software!



- 




erniela katy
September 29, 2021

Downloaded it and looked good



- 



Vi Ayel
September 30, 2021


32 likes, not easy



- 

nick tofino
November 14, 2021




Scam scam scam

5
- 




AI F
November 27, 2021

Professional scammers! Please don't even download the app. Keep your money and don't give it to these scammers.



- 



Winafred Franklyn
September 26, 2021


It's worth the software you have.



- 

Kalynda Lownie
September 26, 2021




My friend is using this. It's pretty good

1
- 




Luretta Simenon
September 26, 2021

It's a big change. Keep working hard



- 



Salazar Scriven
September 27, 2021


The update is very good



- 

Gabe Rumney
October 18, 2021




This is some bullshir scam, do not use this nonsense

8
- 




Pardee Geary
September 1, 2021

At the top, good



- 




Haedyn Sebrens
September 17, 2021

Ivana sooo good!



- 



Lennon Donovan
September 26, 2021


Recommended by students



- 



Alani Archbell
September 26, 2021

I can't help looking at it every day

1
- 

Dru Brammar

- D

September 26, 2021

Very good software
- J

Josean Accombe

September 26, 2021

Not bad. Kill the time.
- L

Lin Gerardo

August 31, 2021

No missing app
- C

Cheval Atlay

September 26, 2021

I have to browse it every day
- C

Currey Carberry

August 28, 2021

It's a must have for your phone
- P

Patrick Duty

September 17, 2021

Nice Fun to play
- k

kamron brenna

September 29, 2021

Right, do n't you know it 's fun?
- d

denby Kristofer zhang

September 30, 2021

Well, as always.
- R G

November 3, 2021

This app is garbage

3
- D

Dewayne Krull

August 28, 2021

I feel pretty good, so I came to give a good comment
- B

Boger Layden

August 28, 2021

Add some photos to show me
- A

Achai Petchey

September 17, 2021

I love this app
- t

travis darrell

September 29, 2021

Still feel good! ~~
- O

Oliver Halloran

September 1, 2021

Watch this app. It must be awesome
- Ca

Ca beatrice

September 29, 2021

OK, I prefer to use
- W

Welch Numbers
















September 29, 2021

Show me a few photos
- V

Vandervort Orogian

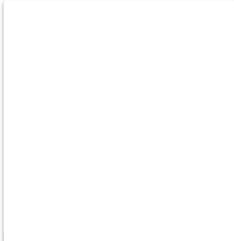
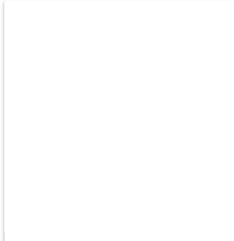
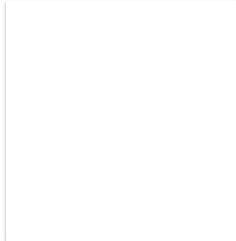
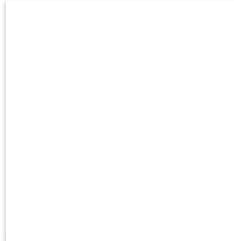
September 1, 2021

This app gives you five points.

-  **Jose Jaquan**
September 1, 2021
Great. Five points
-  **Maye Villareal**
September 1, 2021
Yes, very well
-  **Alexys Alysia**
September 1, 2021
Don't know. It's easy to use
-  **Athyna Golledge**
September 17, 2021
Best app The best
-  **Deloera Stormy**
August 27, 2021
Better than other app
-  **Hossein Ghadyani**
November 15, 2021
scam app and they website is shut down and they not withdraw people money
-  **Maedelle Daout**
September 17, 2021
Love this app
-  **Wood Ioannis**
September 26, 2021
How many times a day
-  **Sosa Ashleigh**
September 26, 2021
This software has just been installed
-  **Tyson Rachman**
September 26, 2021
I have to say it's great
-  **Cain Turk**
September 26, 2021
If you really do it with your heart
-  **Norris Timothy**
September 26, 2021
Bang Bang Da is a good software
-  **Ward Pownall**
September 26, 2021
It's got to be Zanna
-  **Mills Givens**
September 18, 2021
Great me app
-  **Beach Daria**
September 26, 2021
It's a good conscience

Similar

[See more](#)

 Buildertrend Buildertrend	 iComfort Thermostat Lennox Indust	 Neurocycle Switch on You	 SiteDocs SiteDocs
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By purchasing this item, you are transacting with Google Payments and agreeing to the Google Payments [Terms of Service](#) and [Privacy Notice](#).

This is **Exhibit "I"** referred to in the
Affidavit of Jeffrey Wang, affirmed before me at the City of
Toronto, in the Province of Ontario, this 3rd day of December, 2021

A handwritten signature in blue ink, consisting of a large, stylized initial 'J' followed by a long horizontal stroke that extends to the right and then curves slightly downwards.

Commissioner for Taking Affidavits (or as may be)

From: Ernalyn Miranda <ernalyn.miranda@icloud.com>
Sent: Wednesday, December 1, 2021 7:15 PM
To: Sunrise Application
Subject: Hello please see attachment

Follow Up Flag: Follow up
Flag Status: Flagged

EXTERNAL SENDER

5:04

◀ Camera



October 24
8:11 PM

Edit



Your *Interac* e-transfer was sent!



Reference number:
H734708802021102522112332

New account balance

~~Checking - Preferred Package (2984)~~

To



Sunriserios

Sunriserios123@gmail.com

Legal name

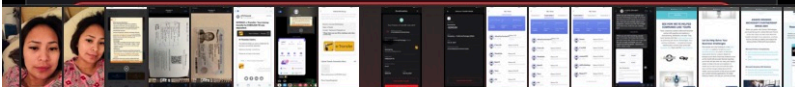
CHENJUN YE

Contact method

Email

Amount
\$200.00

Date
Oct 24, 2021



5:01



Interac e-Transfer details



DEPOSITED

Sunrise technology 2

-\$4,200.00

From

Chequing — Preferred Package (2984)

Date

Nov 5, 2021

Message

310805

Reference number

H316101012021110519233969

Make another transfer

5:01



Interac e-Transfer details



DEPOSITED

Sunrise T

-\$4,800.00

From

Chequing — Preferred Package (2984)

Date

Oct 29, 2021

Reference number

H974554522021102919172342

Make another transfer

5:00



Interac e-Transfer details



DEPOSITED

Sunriserios

-\$200.00

From

Chequing — Preferred Package (2984)

Date

Oct 25, 2021

Reference number

H734708802021102522112332

Make another transfer

5:00



Interac e-Transfer details



DEPOSITED

Sunriserios

-\$200.00

From

Chequing — Preferred Package (2984)

Date

Oct 25, 2021

Reference number

H734708802021102522112332

Make another transfer

5:00



Interac e-Transfer details



DEPOSITED

Baoyingcao

-\$100.00

From

Chequing — Preferred Package (2984)

Date

Oct 18, 2021

Reference number

H441850982021101801371210

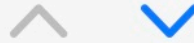
Make another transfer

Sent from my iPhone

From: jimmy noronio <jimmynoronio@yahoo.com>
Sent: Thursday, December 2, 2021 11:23 AM
To: Sunrise Application
Subject: Money back

EXTERNAL SENDER

Hi,I invested money in sunrise. Atatched are proof of e transfer.The last picture shows the total amount I invested to sunrise. Thank you.



INTERAC e-Transfer: Your money transfer to MALENA RIOS BELTRAN was deposited.



[View in browser](#) | [Français](#)



Hi NORONO, JIMMY,

The \$300.00 (CAD) you sent to MALENA RIOS BELTRAN has been successfully deposited.

Details of the Transfer:

Message: Id 309727

Reference Number: CACFZaPv

Please do not reply to this email.

[FAQs](#) | This is a secure transaction





Receipt



Transfer Status: Completed

To: Sunrise (MALENA RIOS BELTRAN)

Notifications: finance@sunrise-tech.ca

From:



Amount: \$300.00

When: Now

Service Charge: \$0.90

Total: \$300.90

Memo (Optional): Id 309727

Confirmation: 20211104102801662334

[SEND ANOTHER TRANSFER](#)

Confirmation



To



Sunrise

Sunriserios123@gmail.com

Legal name

CHENJUN YE

Contact method

Email

Amount

\$100.00

Date

Oct 24, 2021

Message

Id#: 309727

[Make another transfer](#)

[Return to home](#)

Confirmation



To



Bao

baoyingcao1987@outlook.com

Legal name

**13364097 CANADA INC (13364097
CANADA INC)**

Contact method

Email

Amount

\$200.00

Date

Oct 18, 2021

Message

Id#309727

Make another transfer

Return to home

← **Interac e-Transfer details**



DEPOSITED

Bao

-\$200.00

From

Chequing — Basic (7222)

Date

Oct 19, 2021

Message

Id#309727

Reference number

H502110352021101913281988

Make another transfer



Confirmation



Reference number:

H298623952021101418274287

New account balance

Chequing - Basic (7222)

~~\$146.48~~

To



Bao

baoyingcao1987@outlook.com

Legal name

**13364097 CANADA INC (13364097
CANADA INC)**

Contact method

Email

Amount

\$50.00

Date

Oct 13, 2021



Account History

Wallet Recharge Withdraw Orders Completed W

Approved **300.00**
2021/11/04 11:26:10

Approved **100.00**
2021/10/25 11:09:33

Approved **200.00**
2021/10/19 10:29:56

Approved **50.00**
2021/10/15 12:21:23

Approved **50.00**
2021/10/14 15:30:20

-No more -

Sent from my iPhone

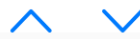
From: Ahmad Mirabedin <ahmadmirabedin@gmail.com>
Sent: Wednesday, December 1, 2021 9:39 PM
To: Sunrise Application
Subject: Seyedahmad mirabedinnazoksara

Follow Up Flag: Follow up
Flag Status: Flagged

EXTERNAL SENDER

Hi,
My name is seyedahmad Mirabedinnazoksara. I e transferred to sunrise app the sum of 2000\$canadian. These are the receipts of them.
Thanks

2:16

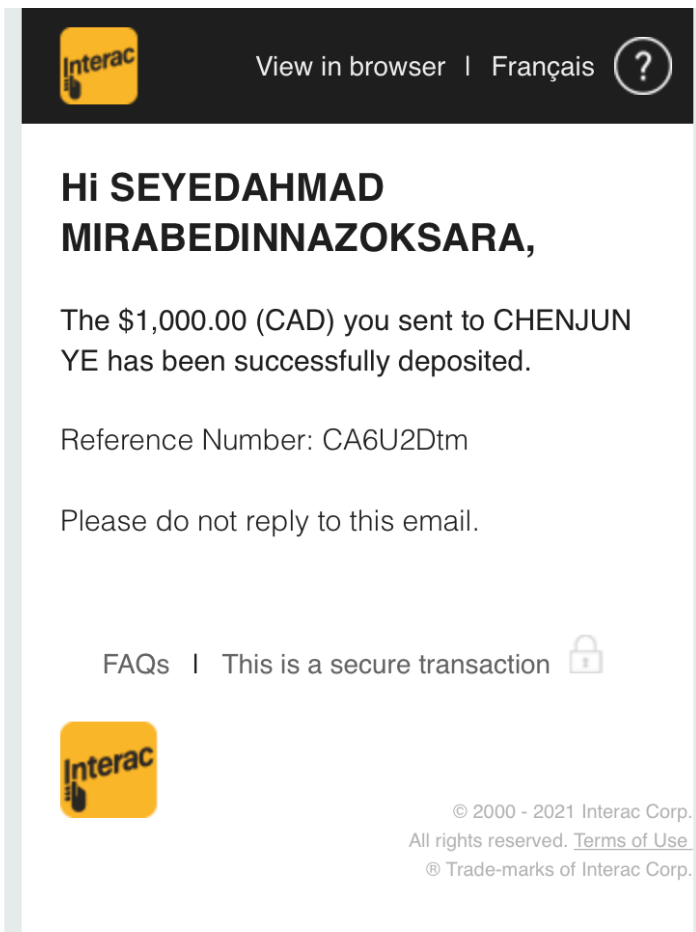


TD Canada Trust

2021-10-24

To: SEYEDAHMAD MIRABEDINNAZOKS... >

INTERAC e-Transfer: Your money transfer to CHENJUN YE was deposited.



Updated

2:15



TD Canada Trust

2021-10-26

To: SEYEDAHMAD MIRABEDINNAZOKS... >

INTERAC e-Transfer: Your money transfer to MALENA RIOSBELTRAN was deposited.

The screenshot shows an email from Interac. At the top left is the Interac logo. To its right are the links "View in browser" and "Français", followed by a help icon (a question mark in a circle). The main body of the email starts with "Hi SEYEDAHMAD MIRABEDINNAZOKSARA,". Below this, it states: "The \$1,000.00 (CAD) you sent to MALENA RIOSBELTRAN has been successfully deposited." The reference number "CAJQN7vE" is provided. A note says "Please do not reply to this email." At the bottom of the email content, there are links for "FAQs" and "This is a secure transaction" with a lock icon. The Interac logo is repeated at the bottom left of the email content. On the bottom right, there is a copyright notice: "© 2000 - 2021 Interac Corp. All rights reserved. [Terms of Use](#) © Trade-marks of Interac Corp."



Updated

Sent from my iPhone

This is **Exhibit "J"** referred to in the
Affidavit of Jeffrey Wang, affirmed before me at the City of
Toronto, in the Province of Ontario, this 3rd day of December, 2021

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right, positioned above a horizontal line.

Commissioner for Taking Affidavits (or as may be)

 **Balance**

Balance

c\$ **10.11**

Withdraw



Recharge


Recharge Instructions

Minimum Recharge:C\$50.00

Withdrawal instructions

Banks may need time to process the large volume of orders and in order to divert order pressure, Sunrise decided to accept recharge and withdraws by crypto ONLY from 2021/10/28, and withdraw orders will enjoy 3% discount on withdraw bank costs. Users who have successfully withdrawn but not yet received payments, credits will be returned to Sunrise account for re-withdraw by crypto. At the same time, we will GIFT \$10 to users whose withdraw payments arrivals been delayed for more than 4 days.

This is **Exhibit "K"** referred to in the
Affidavit of Jeffrey Wang, affirmed before me at the City of
Toronto, in the Province of Ontario, this 3rd day of December, 2021



Commissioner for Taking Affidavits (or as may be)

From: Tabir Malik
Sent: Tuesday, November 23, 2021 3:33 PM
To: Jeffrey Wang
Subject: FW: Follow up Ivy Bao Cao

From: Fawcett, Michael (MAG) <Michael.Fawcett@ontario.ca>
Sent: Tuesday, November 23, 2021 3:32 PM
To: Andrew Faith <afaith@polleyfaith.com>; Patterson, Scott (MAG) <Scott.Patterson@ontario.ca>; Wyngaarden, Jeffrey (MAG) <Jeffrey.Wyngaarden@ontario.ca>
Cc: Tabir Malik <tmalik@polleyfaith.com>
Subject: RE: Follow up Ivy Bao Cao

EXTERNAL SENDER

Hi Andrew:

We have no objection to your proposal for the appointment of a receiver to assist with the distribution of the funds back to the victims in this matter. At this point, proceeding with criminal restraint and forfeiture does not look like a realistic possibility, and so your proposal might be the only way to have some of the funds returned to the victims.

Please let me know if you need any additional information.

Mike

Michael Fawcett
Crown Counsel
Ministry of the Attorney General, Crown Law Office – Criminal
720 Bay Street, 10th Floor | Toronto, ON | M7A2S9 | Cell: (416) 268-4342

From: Andrew Faith <afaith@polleyfaith.com>
Sent: November 23, 2021 9:32 AM
To: Fawcett, Michael (MAG) <Michael.Fawcett@ontario.ca>; Patterson, Scott (MAG) <Scott.Patterson@ontario.ca>; Wyngaarden, Jeffrey (MAG) <Jeffrey.Wyngaarden@ontario.ca>
Cc: Tabir Malik <tmalik@polleyfaith.com>
Subject: Follow up Ivy Bao Cao

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

All –

Following Ivy's police statement on Thursday, we would like to move forward with a process to appoint a receiver. Having thought this through, it is the only way that the monies may be fairly returned to the Sunrise Technology "customers". As such, I would appreciate knowing whether at this juncture the Crown or YRPS would object to our bringing an interpleader motion this week before the Superior Court.

Regards,

Andrew

Polley Faith LLP

MEMBER
Largest Employer in the Firm

Andrew Faith

T: [416.365.1602](tel:416.365.1602)

F: [416.365.1601](tel:416.365.1601)

afaith@polleyfaith.com

Polley Faith LLP
The Victory Building
80 Richmond St. W.
Suite 1401
Toronto ON M5H 2A4
www.polleyfaith.com



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BAO YING CAO et al.
Applicants

-and-
XIAODONG YANG et al.
Respondents

Court File No. CV-21-00672880-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

PROCEEDING COMMENCED AT
TORONTO

**AFFIDAVIT OF JEFFREY WANG
(December 3, 2021)**

POLLEY FAITH LLP
TD North Tower
77 King St. W.
Suite 2110
Toronto ON M5K 2A1

Andrew Faith (47795H)
afaith@polleyfaith.com

Diane Shnier (77811N)
dshnier@polleyfaith.com

Tel: 416.365.1600

Lawyers for the applicants

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

B E T W E E N:

BAO YING CAO and 13364097 CANADA INC.

Applicants

and

XIAODONG YANG and USERS OF SUNRISE TECHNOLOGY

Respondents


*APPLICATION FOR INTERPLEADER ORDER AND APPOINTMENT OF RECEIVER UNDER
SECTION 101 OF THE COURTS OF JUSTICE ACT (ONTARIO)*

CONSENT

BDO Canada Limited hereby consents to act as Receiver of the property, assets and undertakings of 13364097 Canada Inc. and in particular the Contested Funds held by Bao Ying Cao and 13364097 Canada Inc. as described in the form of the draft Order included with the Applicants' Application Record with such amendments as may be ordered by the Court, such amendments on notice to and acceptable to **BDO Canada Limited**.

December 3, 2021

BDO Canada Limited

Per: 

Name: Chris Mazur
Senior Vice President

I have authority to bind the corporation

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

THE HONOURABLE) THE
JUSTICE)
DAY OF, 2021

B E T W E E N:

(Court Seal)

BAO YING CAO and 13364097 CANADA INC.

Applicants

and

XIAODONG YANG and USERS OF SUNRISE TECHNOLOGY

Respondents

INTERPLEADER ORDER

ON READING the materials filed in support of this application, on hearing the submissions of the applicants, on hearing the submissions, if any, of those respondents attending the hearing, and on reading the consent of BDO Canada Limited to act as Receiver;

Service

1. THIS COURT ORDERS that the time for service of the notice of application, application factum and application record is abridged and service is validated so that this application is properly returnable today;

Declarations as to interpleader

2. THIS COURT DECLARES that a conflict exists among the respondents regarding their claims to net funds paid (the “Contested Funds”) as part of a scheme (the “Sunrise Technology Scheme”) operated by the respondent Xiaodong Yang, some of which are currently held by 13364097 Canada Inc. and Bao Ying Cao;

3. THIS COURT DECLARES that the applicants 13364097 Canada Inc. and Bao Ying Cao have no beneficial claim to the Contested Funds, having come into possession of certain Contested Funds innocently as a result of the Sunrise Technology Scheme;

Appointment of receiver and transfer of Contested Funds held by 13364097 Canada Inc.

4. THIS COURT ORDERS that pursuant to s. 101 of the *Courts of Justice Act* and Rule 41.03 of the *Rules of Civil Procedure*, BDO Canada Limited is appointed receiver (“**Receiver**”), without security, of the Contested Funds held by the applicant 13364097 Canada Inc., and in particular the Contested Funds it holds in the CIBC Business Chequing account no. 90-39112 (Branch Transit Number 02242) and the CIBC Business Savings account 90-39317 (Branch Transit Number 02242);

5. THIS COURT ORDERS that 13364097 Canada Inc. transfer the Contested Funds it holds to the Receiver, and take whatever actions are necessary to permit the Receiver to access, control and disburse the Contested Funds held by 13364097 Canada Inc., pursuant to Rules 43.04(1)(a) and 43.04(2)(g);

Appointment of receiver and identification of Contested Funds held by Bao Ying Cao

6. THIS COURT ORDERS that pursuant to s. 101 of the *Courts of Justice Act* and Rule 41.03 of the *Rules of Civil Procedure*, BDO Canada Limited is hereby appointed Receiver,

without security, over the Contested Funds held by the applicant Bao Ying Cao, and in particular the Contested Funds she holds in the following accounts:

- a) Scotiabank account no. 28472-03879-83 (the “Scotiabank Account”);
- b) CIBC account no. 83-72195 (Transit No. 02242) (the “CIBC Account”);
- c) HSBC account no. 332-135217-152 (the “HSBC Chequing Account”)
- d) HSBC account no. 332-135217-203 (the “HSBC Savings Account”);
- e) EQ Bank account no. 107-237-917 (the “EQ Account”);
- f) Wise account no. 200110136648 (Transit No. 16001) (the “Wise Account”);
- g) The PayPal account associated with the email address "ivycao23@hotmail.com";
and
- h) The PayPal account associated with the email address
Baoyingcao1987@outlook.com (collectively the “PayPal Accounts”)

7. THIS COURT ORDERS that, Bao Ying Cao shall transfer the contents of the accounts she holds that contain exclusively Contested Funds, namely, the CIBC Account, the HSBC Savings Account, the EQ Account, the Wise Account, and both PayPal Accounts listed above, to the Receiver, and take whatever actions are necessary to permit the Receiver to access, control and disburse the Contested Funds held by Bao Ying Cao., pursuant to Rules 43.04(1)(a) and 43.04(2)(g);

8. THIS COURT ORDERS that the Receiver take all reasonable steps to identify the Contested Funds held by Bao Ying Cao and/or 13364097 Canada Inc., among the funds in the remaining accounts listed in paragraph 6, namely, the Scotiabank Account and the HSBC Chequing Account, both of which may contain intermingled personal funds and Contested Funds. For clarity, in identifying the Contested Funds held by Bao Ying Cao and/or 13364097 Canada Inc., the Receiver shall deem any funds used directly or indirectly to facilitate the Sunrise Technology Scheme, including funds transferred directly or indirectly to the respondent Xiaodong Yang, to be Contested Funds;

9. THIS COURT ORDERS that Bao Ying Cao is authorized to continue to use her Scotiabank Account and her HSBC Chequing Account with respect to what she believes to be her personal funds, while the Receiver is in the process of identifying the Contested Funds held in those accounts;

10. THIS COURT ORDERS that Bao Ying Cao provide all necessary assistance, including access to banking information, statements, financial information and other documents, to permit the Receiver to identify the Contested Funds held by her.

11. THIS COURT ORDERS that Bao Ying Cao transfer to the Receiver all Contested Funds identified by the Receiver as being held by her and/or 13364097 Canada Inc., and take whatever actions are necessary to permit the Receiver to access, control and disburse the Contested Funds, pursuant to Rules 43.04(1)(a) and 43.04(2)(g);

Transfer of Contested Funds to the Receiver

12. THIS COURT ORDERS that any financial institution holding an account that the Receiver has identified as containing Contested Funds shall, upon presentation of this Order, cooperate in transferring those Contested Funds to the Receiver;

13. THIS COURT ORDERS that if any financial records the Receiver requires to carry out its obligations under this Order are stored or otherwise contained on a computer or other electronic system of information storage controlled by one of the applicants, the applicant in possession or control of such records shall forthwith give unfettered access to the Receiver for the purpose of allowing the Receiver to recover and fully copy all of the information contained therein whether by way of printing the information onto paper or making copies of computer disks or such other manner of retrieving and copying the information as the Receiver in its discretion deems expedient, and shall not alter, erase or destroy any records without the prior written consent of the Receiver. Further, for the purposes of this paragraph, the applicants shall provide the Receiver with all such assistance in gaining immediate access to the information in the records as the Receiver may in its discretion require including providing the Receiver with instructions on the use of any computer or other system and providing the Receiver with any and all access codes, account names and account numbers that may be required to gain access to the information;

14. THIS COURT ORDERS that the Contested Funds collected by the Receiver under this Order shall be deposited into one or more new accounts to be opened by the Receiver (the "Receivership Accounts") and the monies standing to the credit of such Receivership Accounts

from time to time, net of any disbursements permitted by this Order, shall be held by the Receiver to be paid in accordance with the terms of this Order or any further Order of this Court;

Powers of receiver

15. THIS COURT ORDERS that the Receiver is hereby empowered and authorized, but not obligated, to act at once in respect of the Contested Funds and, without in any way limiting the generality of the foregoing, the Receiver is hereby expressly empowered and authorized to do any of the following where the Receiver considers it necessary or desirable:

- (a) to take possession of and exercise control over the Contested Funds and any and all proceeds, receipts and disbursements arising out of or from the Contested Funds;
- (b) to engage consultants, appraisers, agents, experts, auditors, accountants, managers, counsel and such other persons from time to time and on whatever basis, including on a temporary basis, to assist with the exercise of the Receiver's powers and duties, including without limitation those conferred by this Order;
- (c) to execute, assign, issue and endorse documents of whatever nature in respect of any of the Contested Funds, whether in the Receiver's name or in the name and on behalf of the applicants, for any purpose pursuant to this Order;
- (d) to report to, meet with and discuss with the respondents as the Receiver deems appropriate on all matters relating to the Contested Funds and the receivership, and to share information, subject to such terms as to confidentiality as the Receiver deems advisable;

(e) to obtain statements in an electronic format, and any additional information or documentation the Receiver may require, related to any account reasonably suspected of holding Contested Funds upon presentation of this Order to the institution at which such account is located;

(f) to initiate, prosecute, and continue the prosecution of proceedings in respect of the Contested Funds, and to settle or compromise any such proceedings. The authority conveyed shall extend to such appeals or applications for judicial review in respect of any order or judgment pronounced in any such proceeding; and

(g) to take any steps reasonably incidental to the exercise of these powers or the performance of any statutory obligations;

Payment from the Contested Funds

16. THIS COURT ORDERS that the Receiver and legal counsel to the Receiver shall be paid their reasonable fees and disbursements, including any disbursements incurred by the Receiver in respect of paragraph 14(b) above, out of the Contested Funds in each case at their standard rates and charges unless otherwise ordered by the Court on the passing of accounts, pursuant to Rule 43.04(2)(g);

17. THIS COURT ORDERS that the Receiver and counsel to the Receiver are granted a charge (the "Receiver's Charge") over the Contested Funds currently in the possession of the applicants, as security for such fees and disbursements, both before and after the making of this Order in respect of these proceedings, and that the Receiver's Charge shall form a first charge on the Contested Funds in priority to all security interests, trusts, liens, charges and encumbrances,

statutory or otherwise, in favour of any person, but subject to sections 14.06(7), 81.4(4), and 81.6(2) of the *Bankruptcy and Insolvency Act*;

18. THIS COURT ORDERS that the Receiver and its legal counsel shall pass its accounts from time to time, and for this purpose the accounts of the Receiver and its legal counsel are hereby referred to a judge of the Commercial List of the Ontario Superior Court of Justice;

19. THIS COURT ORDERS that prior to the passing of its accounts, the Receiver shall be at liberty from time to time to apply reasonable amounts, out of the Contested Funds it holds, against its fees and disbursements, including legal fees and disbursements, incurred at the standard rates and charges of the Receiver or its counsel, and such amounts shall constitute advances against its remuneration and disbursements when and as approved by this Court;

20. THIS COURT ORDERS that the applicants' reasonable legal costs in bringing this application shall be paid out of the Contested Funds, pursuant to Rule 43.04(1)(c);

Limitations on liability

21. THIS COURT ORDERS that no proceeding or enforcement process in any court or tribunal (each, a "Proceeding"), shall be commenced or continued against the Receiver in its capacity as receiver except with the written consent of the Receiver or with leave of this Court;

22. THIS COURT ORDERS that no Proceedings shall be commenced or continued against the applicants in respect of the Contested Funds, except with the written consent of the Receiver or with leave of this Court, and any such proceedings currently under way shall be stayed and suspended pending further Order of this Court;

23. THIS COURT ORDERS that all rights and remedies against the Receiver in its capacity as receiver and against the applicants with respect to the Contested Funds are hereby stayed and suspended except with the written consent of the Receiver or leave of this Court, provided however that this stay and suspension does not apply in respect of any "eligible financial contract" as defined in the *Bankruptcy and Insolvency Act*;

24. THIS COURT ORDERS that the Receiver shall incur no liability or obligation as a result of its appointment or carrying out the provisions of this Order, save and except for any gross negligence or wilful misconduct on its part;

25. THIS COURT ORDERS that upon compliance with the Order of this Court, the liability of the applicants in respect of the Contested Funds is extinguished, and in particular, the applicants shall not be liable for the portion of the Contested Funds taken as payment by the Receiver, or by the applicants for their reasonable legal fees, pursuant to Rule 43.04(1)(b);

Service and notice

26. THIS COURT ORDERS that the E-Service Protocol of the Commercial List (the "**Protocol**") is approved and adopted by reference herein and, in this proceeding, the service of documents made in accordance with the Protocol (which can be found on the Commercial List website at <http://www.ontariocourts.ca/scj/practice/practice-directions/toronto/e-service-protocol/>) shall be valid and effective service. Subject to Rule 17.05 this Order shall constitute an order for substituted service pursuant to Rule 16.04 of the Rules of Civil Procedure. Subject to Rule 3.01(d) of the Rules of Civil Procedure and paragraph 21 of the Protocol, service of documents in accordance with the Protocol will be effective on transmission. This Court further

orders that a Case Website shall be established in accordance with the Protocol with the following URL: ‘<https://www.bdo.ca/en-ca/extranets/sunrise-claims/>’;

27. THIS COURT ORDERS that if the service or distribution of documents in accordance with the Protocol is not practicable, the Receiver is at liberty to serve or distribute this Order, any other materials and orders in these proceedings, any notices or other correspondence, by forwarding true copies thereof by prepaid ordinary mail, courier, personal delivery or facsimile transmission to the claimants or other interested parties at their respective addresses, email addresses, or where no other means of communication is possible, messaging application, including WhatsApp, and that any such service or distribution by courier, personal delivery or facsimile transmission shall be deemed to be received on the next business day following the date of forwarding thereof, or if sent by ordinary mail, on the third business day after mailing;

General

28. THIS COURT ORDERS that the Receiver may from time to time apply to this Court for advice and directions in the discharge of its powers and duties under this Order;

29. THIS COURT HEREBY REQUESTS the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada or in the United States to give effect to this Order and to assist the Receiver and its agents in carrying out the terms of this Order. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Receiver, as an officer of this Court, as may be necessary or desirable to give effect to this Order or to assist the Receiver and its agents in carrying out the terms of this Order; and

30. THIS COURT ORDERS that the Receiver is authorized and empowered to apply to any court, tribunal, regulatory or administrative body, wherever located, for the recognition of this Order and for assistance in carrying out the terms of this Order, and that the Receiver is authorized and empowered to act as a representative in respect of the within proceedings for the purpose of having these proceedings recognized in a jurisdiction outside Canada.

(Signature of Judge)

BAO YING CAO et al.
Applicants

-and-
XIAODONG YANG et al.
Respondents

Court File No. CV-21-00672880-00CL

Xiaodong Yang
Users of Sunrise Technology

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

PROCEEDING COMMENCED AT
TORONTO

INTERLEADER ORDER

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-and-
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APPLICATION RECORD

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