

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 102470 / February 20, 2025**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-22382**

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<b>In the Matter of</b>	:	
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<b>TAI MO SHAN LIMITED,</b>	:	<b>EXTENSION ORDER</b>
	:	
<b>Respondent.</b>	:	
_____	:	

The Division of Enforcement (“Division”) has requested an extension of time until February 20, 2026, to submit a Proposed Plan of Distribution under Rule 1101(a) of the Commission’s Rules on Fair Fund and Disgorgement Plans, 17 C.F.R. § 201.1101(a).

On December 20, 2024, the Commission issued an Order Instituting Cease-and-Desist Proceedings Pursuant to Section 8A of the Securities Act of 1933, Making Findings, and Imposing a Cease-and-Desist Order (the “Order”)<sup>1</sup> against Tai Mo Shan Limited (the “Respondent”). In the Order, the Commission found that from January 2021 to May 2022, Tai Mo Shan, directly or indirectly, offered and sold securities through the use of interstate commerce when no registration statement was in effect with respect to these offers and sales. According to the Order, Tai Mo Shan acted as a statutory underwriter with respect to certain of its offers and sales of LUNA, a crypto asset issued by Terraform Labs PTE Ltd. (“Terraform”) and offered and sold as a security. The Commission found that, as a result of this conduct, Tai

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<sup>1</sup> Securities Act Rel. No. 11349 (Dec. 20, 2024).

Mo Shan violated Sections 5(a) and (c) of the Securities Act. The Commission further found Tai Mo Shan negligently engaged in a course of conduct in May 2021 that misled members of the investing public about the efficacy of Terraform’s so-called “algorithmic stablecoin,” UST, when it dropped in value from its \$1 peg (“de-peg”). According to the Order, in light of prior statements by Terraform that its algorithmic mechanism would maintain UST’s \$1 peg, Tai Mo Shan acted negligently by trading UST in a manner that deceived the market that Terraform’s algorithmic mechanism was working as intended to stabilize UST’s price at \$1. The Commission found that as a result of its negligent conduct, Tai Mo Shan violated Section 17(a)(3) of the Securities Act.

The Commission ordered the Respondent to pay \$73,452,756.00 in disgorgement, \$12,916,153.00 in prejudgment interest, and a \$36,726,378.00 civil money penalty, for a total of \$123,095,287.00, to the Commission. The Commission also created a Fair Fund pursuant to Section 308(a) of the Sarbanes-Oxley Act of 2002, so the penalty collected, along with the disgorgement and prejudgment interest collected, can be distributed to harmed investors (the “Fair Fund”).

The Fair Fund consists of the \$123,095,287.00 collected from the Respondent. The Fair Fund has been deposited in a Commission-designated account at the U.S. Department of the Treasury, and any accrued interest will be added to, and become a part of, the Fair Fund.

In its request for an extension of time, the Division states that additional time is needed to, among other things, complete the fund administrator solicitation and appointment process; develop the distribution methodology; coordinate, as appropriate, with the anticipated distribution of funds paid in connection with *SEC v. Terraform Labs PTE, Ltd., et al.*, 23-cv-1346-JSR (S.D.N.Y.); and prepare the proposed plan of distribution.

Accordingly, for good cause shown, IT IS HEREBY ORDERED that the Division's request for an extension of time until February 20, 2026, to submit a Proposed Plan of Distribution is granted.

For the Commission, by the Division of Enforcement, pursuant to delegated authority.<sup>2</sup>

Vanessa A. Countryman  
Secretary

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<sup>2</sup> 17 C.F.R. § 200.30-4(a)(21)(i).