

I. Summary of the Offense

1. Corporation declared void for tax delinquency.

The Delaware Secretary of State lists **Option Quant Inc.** (“Oquant”) – File No. 5978519 – as “**Void, AR’s or Tax Delinquent**” effective **1 March 2020**, with franchise-tax arrears of **US \$306,495** dating to 2017.20250718 Appendix F

2. Continued exercise of corporate powers.

Notwithstanding the void charter, Oquant’s principals **Muhammad (“Mo”) Ali** (Vancouver, BC) and lead investor **Elliott Donnelley II** (San Francisco, CA) have:

- solicited investment capital (representing the company as fully operational);
- hired employees and contractors worldwide (my client among them);
- executed Statements of Work and other contracts through at least **August 2023**; and
- falsely assured creditors that the company is funded and debts will be paid.20250718 Complaint

3. Applicable statutes.

Under **DGCL §§ 510-513**, once the Governor proclaims a charter repealed for non-payment of franchise tax, the corporation **loses all authority** to transact business.

- **§ 512** imposes **personal liability** on officers, directors, and stockholders for every debt contracted during the void period.
- **§ 513** makes it a **misdemeanor** for any person to “exercise or attempt to exercise any powers under the certificate of incorporation” after the proclamation. Each post-void act is a separate offense.

4. Harm to creditors and the public.

The deliberate concealment of the company’s void status enabled Ali and Donnelley to defraud workers, vendors, and prospective investors across state and national borders. My client alone is owed **US \$115,216.64** in unpaid wages; similar sums are claimed by other victims documented in the attached arbitration complaint.20250718 Complaint

II. Request for Enforcement Action

Pursuant to 29 Del. C. § 2504 and the Department's mandate to prosecute corporate-fraud offenses, I respectfully demand that the Criminal Division:

1. **Open a criminal investigation** into Ali, Donnelley, and any other responsible parties for willful violations of DGCL § 513 and related fraud statutes;
2. **Seek felony-level charges** where the conduct also constitutes theft, securities fraud, or wire fraud under Delaware or federal law;
3. **Freeze bank and brokerage accounts** under 11 Del. C. § 2311 to preserve assets for restitution;
4. **Pursue personal restitution orders** for all creditors deceived during the void period, including my client;
5. **Coordinate with the Delaware Division of Corporations and the Department of Finance** to recover all outstanding franchise taxes and penalties; and
6. **Refer the matter to federal authorities** (FBI / SEC) for parallel prosecution of interstate investment fraud.

The egregious, ongoing nature of this scheme warrants the **maximum statutory penalties** and a public enforcement action to deter similar abuses of Delaware's corporate system.

III. Evidentiary Package Provided

Attached for your immediate review are:

Exhibit Description		Pages
A	Delaware SOS status report for Option Quant Inc. (retrieved 15 July 2025)	1
B	Sworn Demand for Arbitration & Statement of Claim detailing post-2020 operations and unpaid debts	18
C	Supporting correspondence, invoices, and Zoom-call transcripts (selected)	25+

Additional documentation (bank records, investor pitches, wire-transfer misrepresentations, etc.) can be produced promptly under subpoena.

IV. Contact & Next Steps

Please acknowledge receipt of this referral at your earliest convenience. I am prepared to:

- furnish originals or certified copies of all exhibits;
- arrange sworn interviews with affected witnesses; and
- cooperate fully with any grand-jury or trial proceedings.