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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

**PETER ROOR (individually and d/b/a Oxford Savings Club, Ltd. and Manumit Unlimited),
RONALD L. TEMPLIN (individually and d/b/a American Leadership Network, Saratoga Holdings LLC, Secured Private Placements, The 650 Club, Internet Marketing Partners and Private Party Loan Program), and
LAURIE ELIZABETH WEISS,**

Defendants.

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COMPLAINT

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Plaintiff Securities and Exchange Commission ("Commission"), for its Complaint against defendants Peter Roor ("Roor") (individually and d/b/a Oxford Savings Club, Ltd. ("Oxford") and Manumit Unlimited ("Manumit")), Ronald L. Templin ("Templin") (individually and d/b/a American Leadership Network ("ALN"), Saratoga Holdings LLC ("Saratoga"), Secured Private Placements ("SPP"), The 650 Club ("650"), Internet Marketing Partners ("IMP") and Private Party Loan Program ("PPL")), and Laurie Elizabeth Weiss ("Weiss") (collectively, the "Defendants"), alleges as follows:

SUMMARY OF ALLEGATIONS

1. Since at least November 1998, the Defendants have used the Internet to conduct and promote numerous fraudulent investment schemes through which they have bilked thousands of investors of a total of at least \$1.25 million. Each of these fraudulent schemes is ongoing.

2. Although the schemes have different names, they each follow the same general pattern: the Defendants claim to pool investors' money to invest in secret offshore "trading programs" and assure investors that they will receive astronomical returns (between 10% and 400% per month) with little or no risk of loss. These representations are false. In fact, there are no "trading programs" that generate such risk-free returns, the Defendants have not paid, and do not have the ability to pay, such returns by investing in such programs, and investors are at risk of losing their entire investment. Hundreds of thousands of dollars of investors' funds have been transferred to foreign bank accounts or diverted to at least one defendant's personal benefit.

3. Roor operates a website on the Internet through which he has sold, and continues to sell, investment schemes, including Oxford and Manumit. Templin operates a website through which he has promoted the sale of investments in Oxford and Manumit, and through which he sells investments in at least four other investment schemes of his own: SPP, 650, IMP and PPL. Weiss has operated a website on which she has promoted the sale of investments in Oxford, SPP and 650.

4. The Defendants, directly or indirectly, singly or in concert, have engaged, are engaging, and are about to engage in, and, unless enjoined and restrained, will again engage, in transactions, acts, practices and courses of business that constitute violations of Section 17(a) of

the Securities Act of 1933 ("Securities Act"), 15 U.S.C. § 77q(a), and Section 10(b) of the Securities Exchange Act of 1934 ("Exchange Act"), 15 U.S.C. § 78j(b), and Rule 10b-5, 17 C.F.R. § 240.10b-5, promulgated thereunder.

5. Unless temporarily, preliminarily, and permanently restrained and enjoined, the Defendants will continue to engage in the transactions, acts, practices and courses of business described below, and in similar transactions, acts, practices, and courses of business.

JURISDICTION AND VENUE

6. The Commission brings this action pursuant to the authority conferred upon it by Section 20(b) of the Securities Act, 15 U.S.C. § 77t(b), and Section 21(d) of the Exchange Act, 15 U.S.C. § 78u(d), seeking to enjoin permanently the Defendants from future violations of the federal securities laws. Because the fraudulent schemes are ongoing, the Commission also seeks a temporary restraining order and preliminary injunction restraining and enjoining the Defendants from future violations of the federal securities laws. Against Roor and Templin, the Commission also seeks: (a) disgorgement of ill-gotten gains plus prejudgment interest; (b) an asset freeze pendente lite; (c) an accounting; (d) an order requiring the repatriation of all assets abroad which were obtained or derived from the violation of the federal securities laws; (e) an order prohibiting the acceptance or deposit of funds received from investors; and (f) such other equitable relief that may be deemed appropriate.

7. The Commission also brings this action pursuant to Section 20(d) of the Securities Act, 15 U.S.C. § 77t(d), and Section 21(d) of the Exchange Act, 15 U.S.C. § 78u(d) for civil penalties against the Defendants.

8. This Court has jurisdiction over this action, and venue is proper, pursuant to Sections 20(d) and 22(a) of the Securities Act, 15 U.S.C. § 77t(d) and § 77v(a), and Sections 21(d), 21(e) and 27 of the Exchange Act, 15 U.S.C. §§ 78u(d), 77u(e) and 78aa.

9. The Commission, pursuant to authority conferred upon it by Sections 10(b) and 23(a) of the Exchange Act, 15 U.S.C. §§ 78j(b), 78w(a), has promulgated Rule 10b-5, 17 C.F.R. § 240.10b-5. Rule 10b-5 was in effect at the time of the transactions and events alleged in this Complaint and it remains in effect.

10. The Defendants, directly or indirectly, singly or in concert, made use of the means or instruments of transportation and communication in, and the means or instrumentalities of, interstate commerce, or of the mails, in connection with the transactions, acts, practices and courses of business alleged herein. Certain of the transactions, acts, practices and courses of business alleged herein took place in the Southern District of New York, including, but not limited to, use of the mails and of telephones to communicate with investors in connection with Defendants' fraudulent schemes.

DEFENDANTS

11. Roor, 46, is a Dutch citizen residing in Amsterdam, Netherlands. He holds himself out to be Oxford's Director of International Operations and Manumit's Director

12. Templin, 58, is a resident of Kokomo, Indiana, and does business as ALN, Saratoga, SPP, 650, IMP and PPL.

13. Weiss, 45, is a resident of Waynesville, Missouri. Weiss is self-employed.

FACTS

Roor Sells Investments In Oxford

14. Since at least December 1998, Roor has used the Internet and other means to offer and sell investments in Oxford. In or about March 1999, Roor changed Oxford's name to Manumit. In or about April 1999, Roor changed its name again to Top Return on Investment ("TROI").

15. Roor has made at least two trips to the United States to offer and sell investments in Oxford in person. Roor maintains at least one telephone number in New York, New York, where investors can leave voicemail messages concerning Oxford and to which investors can fax their investment applications.

16. Roor also uses a website at "www.oxford-club.com" on which he has offered and sold investments in Oxford. Oxford's website was available to millions of prospective investors throughout the United States, including in the Southern District of New York. Roor has also sent to hundreds of investors by mail written materials, including a letter signed by Roor.

17. In Oxford's website and written materials, Roor represented that Oxford is a "registered club" with its main office in Antigua but that "people from all countries may join. . . ." Investors in Oxford may invest from a minimum of \$25 to a maximum of \$325,000. Investors are directed to send their checks to Oxford at a post office box address in the Netherlands.

18. In Oxford's website and written materials, Roor represents that Oxford pays investors a return on their investment of 10% per month, or a compound rate of 213.8% per year. Oxford claims to generate such high returns by pooling funds from individual investors to invest in

secret foreign trading markets. Oxford purportedly “combines small loans from many individuals” enabling it to “invest large amounts in the Money Market.”

19. In addition, Roor represents that Oxford pays additional returns to those who “sponsor” new investors. According to Oxford’s website and written materials, Oxford pays up to 3% monthly “Profit Sharing” on all money invested by new referrals, as well as all money invested by referrals from the new investors “through 5 levels.”

20. Roor also emphasized the absence of risk associated with investing in Oxford by representing that “[a]ll loans are secured by Bankers Guarantees so that the funds are never in jeopardy.”

21. In Oxford’s website and written materials, Roor made false or misleading representations concerning Oxford, its profitability and the absence of risk of investing in Oxford. These fraudulent representations include the following:

a. That Oxford “has discovered a way to receive huge returns on a yearly basis” and that Oxford “combines small loans from many individuals” which “makes it possible to invest large amounts in the Money Market.” In fact, there is no “Money Market” investment which yields returns sufficient to enable Oxford to pay profits to investors as represented by Roor.

b. That, in return for an investment in Oxford, “YOU WILL RECEIVE . . . TEN PERCENT (10%) . . . INTEREST PER MONTH!” or “213.8% interest growth per year” (ellipses in original). In fact, Oxford has not paid, and does not have the ability to pay, its investors 10% interest per month by investing in the “Money Market.”

c. That Oxford pays additional returns to those who "sponsor" new investors, including up to 3% monthly "Profit Sharing" on all money invested by new referrals. In fact, Oxford does not pay such "Profit Sharing" to investors who have sponsored new investors.

d. That all investors' funds "are secured by Bankers Guarantees so that the funds are never in jeopardy." In fact, "Bankers Guarantees" do not exist, and Oxford's investors are at risk of losing their entire investment.

22. At the time Roor made the false or misleading representations described above, he had no basis in fact for making such representations and knew, or was reckless in not knowing, that such representations were false or misleading.

23. Roor has received at least 2,000 checks from Oxford's investors, including approximately 700 investors from the United States. At least one Oxford investor resides in New York, New York.

24. Roor also offered and sold investments in Oxford through others. For example, Roor provided Oxford's written materials to Templin to enable Templin to promote Oxford to prospective investors on his own website.

Templin Promotes Oxford On His website

25. Templin controls a website on the Internet at "www.opamerica2.com." Templin's website is available to millions of prospective investors in the United States, including in the Southern District of New York. Since at least December 1998, Templin advertised investments in Oxford on his website using information provided by Roor. Templin also created a separate

webpage on his website to promote Oxford.

26. On his website, Templin made the same false or misleading representations concerning Oxford described in paragraph 21 above. Templin also described Oxford as an "unlimited income opportunity."

27. Templin did not determine whether the representations concerning Oxford which he made on his website were true.

28. At the time Templin made the false or misleading representations described above, he had no basis in fact for making such representations and knew, or was reckless in not knowing, that such representations were false or misleading.

Templin Sells Investments In SPP, 650, IMP And PPL

29. Since at least November 1998, Templin has been using his website to offer and sell investments in SPP, 650, IMP and PPL. Templin's website directs investors to send their money either to Templin's home address or to wire funds directly to a bank account under his control in Latvia.

30. Templin's website represents that SPP pays investors "200% EVERY 60 DAYS (BI-MONTHLY)" on a single investment. The website describes how SPP generates such high returns: "The trading group uses the investors [sic] money to rent some security that can be leveraged into a trading program." As an example, Templin's website explains that the "trading group" uses the investors' money to borrow United States Treasury Bills from wealthy individuals at 2% of the face value of each Treasury Bill and then invests the Treasury Bills in a "trading program" which yields the profits with which to pay investors the promised returns. Templin's

website also describes SPP as a low risk investment, explaining that “[i]n many of these programs when the traders are a securities dealer or trust, they agree to keep [the investor’s money in] cash or cash equivalents on deposit to guarantee the investors [sic] initial investment against loss, but that is a small thing for them. If they are a securities dealer/broker they are also insured usually in the amount of \$10 million anyway.”

31. Templin’s website represents that, in return for an initial investment of \$650, investors in 650 receive a “current yield” of \$2,000 in the first eleven weeks, followed by an additional \$2,000 every six weeks indefinitely. The website describes 650 as a safe investment that provides investors with “Financial Security” in exchange for a single \$650 investment. Although not disclosed on his website, Templin claimed that he is using the money he received from investors in 650 to invest in various offshore programs that will yield returns of 10 to 1 within sixty days.

32. Templin’s website makes similar representations regarding both IMP and PPL. According to Templin’s website, IMP and PPL each pay investors returns of 20 to 1 on their investments in just 120 days. Templin’s website describes each program as “a very interesting loan program that returns \$20 for ever \$1 you loan.” According to the website, Templin uses investors’ funds in a secret offshore program to generate the promised return. “All Loan proceeds will be sent to an offshore program that will remain unidentified to all.” Investors’ funds will be sent to “an overseas Trust & Foundation Company. . . to be used for operational purposes of the project in the interest of an overseas Trust & Foundation firm. . . . [T]he loan plus profit will be repaid to the lender in the amount not less than 20 times of the amount loaned.” The

expected time of repayment is "approximately 120 calendar days." Templin's website also represents that IMP and PPL are very safe investments because investors "are guaranteed to at least receive \$5 for every \$1 you loan."

33. On his website, Templin made, and continues to make, false or misleading representations concerning SPP, 650, IMP and PPL. These fraudulent representations include the following:

a. That SPP pays investors returns on their investments of "200% EVERY 60 DAYS (BI-MONTHLY)." In fact, SPP has not paid, and does not have the ability to pay, investors returns of 200% every sixty days by investing in a "trading program."

b. That SPP is a safe investment because the trading programs into which investor funds are invested "guarantee the investors initial investment against loss." In fact, investors' investments are not guaranteed against loss and investors are at risk of losing their entire investment.

d. That, in return for an initial investment of \$650, investors in 650 receive a "current yield" of \$2,000 in the first eleven weeks, followed by an additional \$2,000 every six weeks indefinitely. In fact, 650 does not have the ability to pay its investors \$2,000 in the first eleven weeks, followed by an additional \$2,000 every six weeks indefinitely by investing in offshore programs.

e. That 650 is a safe investment which provides investors "Financial Security." In fact, 650 does not provide financial security and investors are at risk of losing their entire investment.

f. That IMP and PPL “return \$20 for every \$1” invested in “120 calendar days.” In fact, IMP and PPL have not paid, and do not have the ability to pay, their investors returns of 20-to-1 in 120 days by investing in an “offshore program.”

g. That IMP and PPL are safe investments because investors are “guaranteed to at least receive \$5 for every \$1” invested. In fact, IMP and PPL investors are not guaranteed to receive a 5 to 1 return on their investments and are at risk of losing their entire investment.

34. At the time Templin made the false or misleading representations described above, he had no basis for making such representations and knew, or was reckless in not knowing, that such representations were false or misleading.

35. Since November 1998, Templin has received at least \$1 million from at least 500 investors in SPP, 650, IMP and PPL.

36. Between November 1998 and March 1999, Templin diverted at least \$170,000 to himself and his family. Templin did not disclose to investors that he would divert investor funds to himself or his family. Templin has also transferred at least \$170,000 to foreign bank accounts.

Weiss Promoted Oxford, SPP And 650 On Her website

37. Weiss operates a website at “www.weissonline.com.” Since at least January 1999, Weiss used her website to promote investments in Oxford, SPP and 650. Weiss’ website was available to millions of prospective investors in the United States, including in the Southern District of New York.

38. Weiss' website contained an introductory endorsement of all of the investments on her site.

In today's global environment where changes occur by the minute, the market of Currency and Bank Instruments trading is a very dynamic, safe, and secretive market. The highest security factor is available as all deals and transactions take place through well-established arbitragers [sic] at the top banks in the world. They use highly sophisticated low-risk investment methods, techniques and tools not commonly available for any investors.

These are financial transactions that make an immediate profit without involving any risk, as the buying and selling take place at the same time instantly buying low and selling high. They are possible because of minor pricing discrepancies between markets or related instruments.

This kind of international trading between the top banks in the world is not advertised to the public, not even to other "smaller" banks. American bankers are severely restricted by regulatory procedures which make it impossible for them to offer these transactions to their U.S. clients. As a consequence, most of the trading is conducted in Europe.

* * *

I have found several various programs of this kind and have checked them out. I have selected only a very few that I felt were virtually low risk, yet offered a high return. The ones I feature here DO WORK and they do pay the interest as promised.

This is why I and my sponsors have researched the programs on this site very carefully before joining and before inviting you to join.

39. On her website, Weiss made false or misleading representations concerning Oxford, SPP and 650. These fraudulent representations included the following:
- a. That Oxford, SPP and 650 invest in the "market of Currency and Bank Instruments trading." In fact, there is no market of currency and bank instruments which

yield profits sufficient to enable Oxford, SPP or 650 to pay the returns promised to investors.

b. That Oxford, SPP and 650 "DO WORK and do pay the interest as promised." In fact, Oxford, SPP and 650 have not paid, and are not paying, the returns as promised.

c. That Oxford, SPP and 650 are safe investments because they engage in "financial transactions that make an immediate profit without involving any risk." In fact, Oxford, SPP and 650 do not engage in such transactions and investors are at risk of losing their entire investments.

d. That Weiss "researched the programs on this site very carefully. . . ." In fact, Weiss did not research the programs on her website and did not determine whether the representations she made on her website were true.

e. That Oxford pays investors returns of 10% per month and "IS NOT — A GET RICH QUICK SCAM" (emphasis in original). In fact, Oxford it does not pay, and does not have the ability to pay, its investors 10% interest per month.

f. That SPP pays investors "200% EVERY 60 DAYS (BI-MONTHLY)." In fact, SPP has not paid, and does not have the ability to pay, its investors a 200% return in 60 days.

40. Weiss did not determine whether the representations she made concerning Oxford, SPP and 650 were true.

41. At the time Weiss made the false or misleading representations described above, she had no basis in fact for making such representations and knew, or was reckless in not

knowing, that such representations were false or misleading.

42. In March 1999, Weiss replaced her promotion of Oxford on her website with a promotion for Manumit, Oxford's successor.

43. At least twenty individuals invested in Oxford, SPP and 650 through Weiss' website.

The Investment Schemes Are Ongoing

44. Solicitations for investments in Oxford continue to appear on websites on the Internet. In March 1999, Roor changed Oxford's name to Manumit and, in April 1999 changed its name to TROL. Roor continues to solicit new investors in these programs.

45. Templin's Oxford webpage currently states that "you will be contacted regarding your [Oxford] membership" and that "if you wish to become a member of the new [Manumit] Club, then an existing member must refer you to the Club."

46. Templin continues to offer and sell investments in SPP, 650, IMP and PPL on his website. Templin also maintains at least one electronic bulletin board on the Internet on which he purports to provide investors with updates on the status of their investments in each of his programs.

CLAIM FOR RELIEF

Violations of Section 17(a) of the Securities Act and Section 10(b) of the Exchange Act, and Rule 10b-5 -- Fraud in Connection with the Offer and Sale of Investments in Oxford, SPP, 650, IMP and PPL

47. The Commission realleges and incorporates by reference the allegations contained in paragraphs 1 through 46 above.

48. The investments in Oxford, SPP, 650, IMP and PPL described by the Defendants are "securities" under Section 2(1) of the Securities Act, 15 U.S.C. § 77b(1), and Section 3(a)(10) of the Exchange Act, 15 U.S.C. § 78c(a)(10).

49. The Defendants, directly or indirectly, singly or in concert, in the offer or sale, or in connection with the purchase or sale, of securities by use of the means or instruments of transportation or communication in, or the means or instrumentalities of, interstate commerce, or of the mails: (a) have been employing, and are about to employ, devices, schemes and artifices to defraud; (b) have been obtaining, and are about to obtain, money or property by means of, or otherwise have been making, and are about to make, untrue statements of material fact or omissions to state material facts necessary to make the statements made, in the light of the circumstances under which they were made, not misleading; and (c) have been engaging, and are about to engage, in transactions, acts, practices and courses of business which operated as a fraud or deceit upon purchasers of securities and other persons.

50. As part of and in furtherance of this violative conduct, as alleged above, the Defendants made material misrepresentations and omissions about the existence of, and returns on, the securities, the risks of investing in such securities and the likelihood of receiving the returns that the Defendants promised from such securities.

51. The above-described misrepresentations and omissions by the Defendants were material.

52. The Defendants knew or were reckless in not knowing that the misrepresentations and omissions alleged above were false or misleading.

53. By reason of the foregoing, the Defendants, directly or indirectly, singly or in concert, have violated, are violating, are about to violate, and, unless temporarily, preliminarily and permanently restrained and enjoined, will continue to violate Section 17(a) of the Securities Act, 15 U.S.C. § 77q(a), and Section 10(b) of the Exchange Act, 15 U.S.C. § 78j(b), and Rule 10b-5 thereunder, 17 C.F.R. § 240.10-5.

RELIEF REQUESTED

WHEREFORE, Plaintiff respectfully requests that this Court:

A. Grant a temporary restraining order and an injunction, preliminarily during the pendency of this action and permanently thereafter, restraining and enjoining the Defendants, their agents, servants, employees, attorneys, and all persons in active concert or participation with them who receive actual notice of the injunction by personal service or otherwise, and each of them, from future violations of Section 17(a) of the Securities Act, 15 U.S.C. § 77q(a), and Section 10(b) of the Exchange Act, 15 U.S.C. § 78j(b) and Rule 10b-5, 17 C.F.R. § 240.10b-5.

B. Grant an order freezing pendente lite any and all assets in the name of, in the custody of, or held for the direct or indirect benefit of, Roor and Templin.

C. Grant an Order directing Roor and Templin to file with this Court and serve upon the Commission verified accountings, signed by Roor and Templin under penalty of perjury:

D. Grant an Order requiring Roor and Templin to repatriate and deposit into the Registry of the Court all funds presently located outside the United States in an amount at least equal to that which they obtained through the conduct alleged herein.

E. Grant an order permitting expedited discovery in this action.

F. Grant an order prohibiting the Defendants from destroying, altering, deleting or concealing any documents, including any electronically stored information.

G. Grant an order restraining and enjoining Roor and Templin from negotiating or depositing into any account in which any of them has a direct or indirect beneficial interest or over which they exercise direct or indirect control any monies or assets obtained through the conduct alleged herein.

H. Grant a Final Judgment requiring Roor and Templin to disgorge all ill-gotten profits, gains, income and benefits, derived, directly or indirectly, as a result of their violative conduct, plus prejudgment interest on that amount.

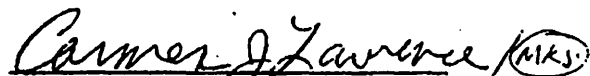
I. Grant a Final Judgment assessing penalties against each Defendant pursuant to Section 20(d) of the Securities Act, 15 U.S.C. § 77t(d), and Section 21(d) of the Exchange Act, 15 U.S.C. § 78u(d), for the violations alleged herein.

J. Grant such other and further relief as this Court shall deem just and proper.

Dated: May 9, 1999
New York, NY

Respectfully submitted,

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Regional Director

 (MKS)

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ASSISTANT REGIONAL DIRECTOR