

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

GLOBAL ASSET PARTNERS, LTD.,
GLOBAL SERVICES GROUP, LLC,
GLOBAL INTERNET FUND GROUP, INC., and
WILLIAM L. HAYNES,

Defendants, and

CENTURION INTERNATIONAL, LLC

Relief Defendant.

CASE NO. 01 - 8862
CIV-MIDDLEBROOKS

MAGISTRATE JUDGE
BANDSTRA

NIGHT BOX
FILED
SEP 28 2001

CLARENCE MADDOX
CLERK, USDC / SDFL / MIA

COMPLAINT FOR INJUNCTIVE AND OTHER RELIEF

Plaintiff, Securities and Exchange Commission ("SEC" or "Commission") alleges and states as follows:

INTRODUCTION

1. The SEC brings this action to enjoin Defendants from continuing to violate the federal securities laws in connection with their ongoing, fraudulent offering of securities through their unregistered broker-dealer, Global Asset Partners, Ltd. ("Global Asset"), and misappropriation of investor funds. Since at least May 1999, Defendants have raised at least \$7 million from over 300 hundred investors in the U.S. and abroad through the fraudulent offering and sale of securities, primarily alleged pre-initial-public-offering ("pre-IPO") stock. Defendants employed a network of sales agents and made material misrepresentations and omissions to investors and prospective investors in order to induce them to purchase pre-IPO stock that was

purportedly set to "go public" in a matter of weeks for several times the purchase price. In fact, contrary to representations made to investors and prospective investors, the offerings for the pre-IPO stock were not imminent. Moreover, Defendants failed to disclose, among other things, that they had acquired the stock at 800% to 1,600% less than the price Defendants sold the stock to investors. Finally, Defendants also misappropriated over \$1 million in investor funds.

DEFENDANTS

2. Upon information and belief, Global Asset is a Bahamian corporation that was incorporated in 1998. Global Asset performed all of its substantive activities from its office located at 225 Mizner Boulevard in Boca Raton, Florida.

3. Global Services Group, LLC ("Global Services") is a Wyoming limited liability company organized in July 2000. Based on information and belief, Global Services' principal office is located at 225 Mizner Boulevard in Boca Raton, Florida and performed all of its activities from Boca Raton, Florida.

4. Global Internet Fund Group, Inc. ("Global Internet") is a Florida corporation incorporated in January 2000. Based on information and belief, Global Internet's principal office is located at 225 Mizner Boulevard in Boca Raton, Florida and performed all of its activities from Boca Raton, Florida.

5. William L. Haynes ("Haynes") is thirty-five (35) years old and a resident of Boca Raton, Florida. Haynes is the director and fund manager of Global Asset, and the Chief Executive Officer and sole shareholder of Global Services and Global Internet. Haynes is the director and sole shareholder of the corporate Defendants, and manages their day-to-day operations, including, but not limited to, hiring all employees and sales agents, selecting the pre-IPO stock

offered for sale, and controlling certain of the corporate Defendants' bank and brokerage accounts.

RELIEF DEFENDANT

6. Centurion International, LLC ("Centurion") is a Nevada corporation incorporated by Haynes in May 2000. Upon information and belief, Centurion's principal office is located at 225 Mizner Boulevard in Boca Raton, Florida and performed all of its activities from Boca Raton, Florida. Centurion has received at least \$18,000 of investor funds.

JURISDICTION AND VENUE

7. This Court has jurisdiction over this action pursuant to Sections 20(b), 20(d) and 22(a) of the Securities Act of 1933 ("Securities Act"), 15 U.S.C. §§ 77t(b), 77t(d) and 77v(a); and, Sections 21(d), 21(e), and 27 of the Securities Exchange Act of 1934 ("Exchange Act"), 15 U.S.C. §§ 78u(d), 78u(e) and 78aa.

8. The Southern District of Florida is the proper venue for this action. Certain actions and transactions alleged and stated herein constitute violations of the Securities Act and the Exchange Act and have occurred within the Southern District of Florida. In addition, Defendants Global Asset, Global Services and Global Internet are located and transacted business within the Southern District of Florida and elsewhere, and Defendant Haynes resides in the Southern District of Florida.

10. Defendants, directly and indirectly, have made use of the means and instrumentalities of interstate commerce, the means and instruments of transportation and communication in interstate commerce, and the mails, in connection with the acts, practices, and courses of business complained of herein.

OVERVIEW OF GLOBAL'S ACTIVITIES

Offer And Sale Of Pre-Ipo Stock And Exchange Traded Securities

11. Since at least May, 1999, Defendants have sold and offered for sale, through their unregistered broker-dealer, Global Asset, pre-IPO stock and exchange-traded securities from the inventory of stock purportedly owned by the corporate defendants, Global Asset, Global Services and Global Internet (collectively, "Global"). Over at least the last two years, Global has raised approximately \$7-8 million from at least 300 investors located worldwide, including the United States, from offices in Boca Raton, Florida and elsewhere.

12. Global operated out of its Boca Raton, Florida, office, employing a network of sales agents who used "lead lists" containing the names of professionals in foreign countries and the U.S., to make unsolicited telephone calls to prospective investors or sent unsolicited notices by facsimile. Global also posted information about the pre-IPO stock it offered for sale on two Internet websites, which were another source of Global's lead lists.

13. During the initial call, the sales agents offered investors the opportunity to purchase either well-known, exchange-traded securities, such as AT&T Corp., or pre-IPO stock. In the case of pre-IPO stock, the sales agents usually told investors that the issuers of the private securities would engage in an IPO in the next one to six months, at an offering price of two to three times the price Global was offering the stock.

14. Defendant Haynes determined which securities Global offered and sold to investors, and the price at which these securities were offered and sold. Defendant Haynes knew or should have known that Global was selling these securities to investors with mark-ups between approximately 800% - 1,600% from the price that Global had paid for the securities.

15. If a potential investor agreed to purchase the pre-IPO stock during the initial phone call, or otherwise indicated interest, Global sent the prospective investor a set of offering

documents, describing the pre-IPO stock for sale, as well as additional written materials describing Global Asset as a "private asset management company" and touting Global's investment background and purported history of success. Global's written materials claimed that Global Asset: "ha[s] invested in several successful initial public offerings involving Internet companies;" that Global "monitor[s] global industry, and political intelligence around the clock;" that Global Asset has a "rigid screening process" for its "investment advisors;" and that Global Asset has a "veteran Research Department" that "offers expert technical and fundamental analysis." Global's materials also offered investors the opportunity to purchase exchange-traded securities through Global.

16. If an investor agreed to purchase either pre-IPO or exchange-traded stock from Global, Global sent the investor a confirmation document that included the name, amount, and purchase price of the securities purchased. The investor was directed to sign and return the confirmation document in order to confirm his or her "order." Global also sent the investor a document that provided the name of the bank or brokerage account where the investor should wire the funds necessary to pay for the securities. When the investor returned the executed documents to Global, Global provided the investor with an account number and represented that it had deposited the share certificates into the "fund."

17. Among the documents executed by investors is a "Private Mutual Fund Client Trading Account Agreement" that expressly represented to investors that their "client trading account agreement can be terminated at any time by [Global Asset] or the [investor] within a thirty day period in written form," after which Global would be obligated "to deliver to the client the proceeds of any sales made on best efforts or the applicable share certificates." Additionally,

Global's "Individual Equity Trading Agreement" represented that either party could terminate the agreement upon one day's written notice.

18. Global's sales agents further represented to investors that they could close their accounts at anytime and receive either the cash value of the accounts or physical possession of their stock certificates.

19. Defendant Haynes solicited at least two prospective investors personally, and repeatedly communicates with current investors in person, over the telephone, and by written correspondence, including e-mail.

20. All of Global's written offering materials were posted on one or both of its Internet sites that are accessible by the general public worldwide.

Defendants' Material Misrepresentations and Omissions

21. The representations made by Global's sales agents to prospective investors were materially false and misleading. Global's written materials also contained numerous material misrepresentations and omissions in a number of respects:

(i) The "Imminence" of the Offerings for Pre-IPO Stock

22. Global's sales agents falsely told investors that the public offering for the pre-IPO stock being offered for sale by Global was "imminent" – usually representing that the stock would go public in one to six months. At the time Global represented that such public offerings were "imminent," Defendants knew, or should have known, that the issuers of the pre-IPO securities offered by Global could not even register to take those companies public for at least another 18-24 months. A company cannot go public until it files a registration statement with the Commission and that registration statement is subsequently declared "effective."

23. Defendant Haynes was aware, through investor complaints, that Global's sales agents were falsely telling prospective investors that the pre-IPO securities would be going public within one to six months.

(ii) False Representations and Omissions Concerning Price

24. Global made price predictions to investors and potential investors concerning the anticipated price the pre-IPO stock would trade at upon becoming public; specifically, sales agents, at the direction of Defendants, represented to potential investors that when the stock went public it would trade at a price at least two to three times the investor's initial purchase price. Defendants, however, made these price predictions without any reasonable basis.

25. For example, Global sold pre-IPO stock of one issuer to investors at \$4 a share, promising investors that it would soon trade between \$8-12 a share when it went public. At that time, the issuer, typical of the pre-IPO companies whose shares Global offered, had few assets, little or no revenue and limited prospects. In fact, after the company's small business registration statement (Form 10SB12G) went effective, the company's shares started trading on the over-the-counter bulletin board market at approximately \$.75 a share, quickly fell to \$.25 a share, and currently trade at \$.37 a share.

26. Defendants knew or should have known that the price predictions they made to prospective investors concerning the pre-IPO stock were false, or otherwise did not have a reasonable basis in fact. As described above, most of the companies touted by Global had few assets and little or no revenue. More significantly, Global had purchased the pre-IPO stock at substantially lower prices than it sold the stock to investors. Global sold the pre-IPO stock to investors at a price approximately 800% - 1,600% above the price that Global paid for the same shares.

(iii) False Representations Concerning Stock Ownership

27. Investors were falsely led to believe that they had individual, segregated accounts and that their ownership interests in their securities were protected. Global's offering materials represented to investors that Global would open for each investor/client a "non-marginable cash account" on behalf of the client and that Global Asset would act as an "investment broker" for purchase and sale of securities. Global further represented that "all [stock] certificates [would] be held in safe keeping by Global Asset or its affiliates..." Further, the investor's purchase confirmation states that "your original certificates will be maintained in your [Global Asset] account unless otherwise noted."

28. Contrary to these and other representations in their written materials, Global did not create individual investor accounts or register the pre-IPO certificates or exchange-traded shares in the individual investor's name. Rather, Global held the pre-IPO securities in its own name and held the exchange-traded securities in accounts under Global's name at third-party broker-dealers that were not identified as being for the benefit of individual investors. Therefore, both the pre-IPO securities and the exchange-traded securities were (and remain) potentially subject to liens, hypothecation and misappropriation by Global.

(iv) False Representations Regarding Termination of Accounts

29. Global's written materials falsely informed potential investors that they could close their accounts upon a day's written notice. Global's sales agents also falsely told potential investors that, if they closed their accounts, they could receive the cash value of the securities held in their accounts.

30. Contrary to these representations, some investors seeking to close their accounts were told that they must wait an extended period of time, sometimes up to twenty-four months, before they could close their individual accounts. Other investors were told that their accounts

were closed and their certificates were forwarded to them; however, those investors never received the certificates. Finally, Global never provided the full cash value of the stock to investors who requested a cash liquidation. Instead, Global required those investors to accept less than the cash value of their individual accounts.

(v) **False Representations and Omissions
Regarding Global's Operations and Expertise**

31. Global misrepresented its track record concerning Internet company IPOs. Global falsely told investors that Global and its clientele invested in several successful IPOs involving Internet companies. In fact, Global has not invested in any successful initial public offerings involving Internet companies.

32. Global also misrepresented its purported "expertise" in research and analysis. Global stated that it monitored global markets, industry and political intelligence around the clock, but in fact did not. Furthermore, while prospective investors were told that Global had a veteran research department with employees that had expert technical and fundamental analysis qualifications, Global did not have a research department at all.

33. Global also falsely touted the background and expertise of its "investment advisors" and claimed to have "a rigid screening process" for its "investment advisors." Defendants knew or should have known that this representation was false as none of the sales agents or marketers that were offering and selling securities to investors were licensed "investment advisors" and Global did not do reference checks on sales agents prior to their being hired.

Misappropriation of Investor Funds

34. Global misrepresented to investors that it would sell them certain exchange-traded securities. Instead, Global misappropriated funds that investors sent for the purchase of those securities.

35. Global's own customer records show a shortfall of approximately \$1.1 million between the actual value of exchange-traded securities that Global currently holds for investors and the value of the securities that it purports to hold for investors. According to Global's own customer records, the current market value of exchange-traded securities that Global sold to investors is at least approximately \$1.2 million, however, Global only holds about \$100,000 of the exchange-traded securities.

COUNT I

**SALE OF UNREGISTERED SECURITIES IN
VIOLATION OF SECTIONS 5(a) AND 5(c) OF THE SECURITIES ACT**

36. The Commission realleges and repeats its allegations set forth at paragraphs 1 through 35 of this Complaint.

37. No registration statement was filed or in effect with the Commission pursuant to the Securities Act, and no exemption from registration exists, with respect to the securities and transactions described herein.

38. Since a date unknown but since at least May 1999 to the present, Defendants, Global Asset, Global Services, Global Internet and Haynes, directly or indirectly, have:

(a) made use of the means or instruments of transportation or communication in interstate commerce or of the mails to sell securities as described herein, through the use or medium of a prospectus or otherwise;

(b) carried securities or caused such securities, as described herein, to be carried through the mails or in interstate commerce, by any means or instruments of transportation, for the purpose of sale or delivery after sale; and/or

(c) made use of the means or instruments of transportation or communication in interstate commerce or of the mails to offer to sell or offer to buy through the use or medium of any prospectus or otherwise, as described herein, without a registration statement having been filed or being in effect with the Commission as to such securities.

39. By reason of the foregoing, Defendants, Global Asset, Global Services, Global Internet and Haynes have violated, and unless enjoined, will continue to violate Sections 5(a) and 5(c) of the Securities Act, 15 U.S.C. §§ 77e(a) and 77e(c).

COUNT II

**FRAUD IN VIOLATION OF
SECTION 17(a)(1) OF THE SECURITIES ACT**

40. The Commission realleges and repeats its allegations set forth at paragraphs 1 through 35 of this Complaint.

41. Since a date unknown but since at least May 1999 to the present, Defendants, Global Asset, Global Services, Global Internet and Haynes, directly or indirectly, by use of the means or instruments of transportation or communication in interstate commerce or by use of the mails, in the offer or sale of securities, as described herein, have, knowingly, willfully or recklessly employed devices, schemes or artifices to defraud.

42. By reason of the foregoing, Defendants, Global Asset, Global Services, Global Internet and Haynes, directly and indirectly, have violated and, unless enjoined, will continue to violate Section 17(a)(1) of the Securities Act, 15 U.S.C. § 77q(a)(1).

COUNT III

**FRAUD IN VIOLATION OF
SECTIONS 17(a)(2) AND 17(a)(3) OF THE SECURITIES ACT**

43. The Commission realleges and repeats its allegations set forth at paragraphs 1 through 35 of this Complaint.

44. Since a date unknown but since at least May 1999 to the present, Defendants, Global Asset, Global Services, Global Internet and Haynes, directly and indirectly, by use of the means or instruments of transportation or communication in interstate commerce and by the use of the mails, in the offer or sale of securities, as described herein, have: (a) obtained money or property by means of untrue statements of material facts and 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/or (b) engaged in transactions, practices and courses of business

which operated and would have operated as a fraud or deceit upon the purchasers of such securities.

45. By reason of the foregoing, Defendants, Global Asset, Global Services, Global Internet and Haynes, directly and indirectly, have violated and, unless enjoined, will continue to violate Sections 17(a)(2) and 17(a)(3) of the Securities Act, 15 U.S.C. §§ 77(q)(a)(2) and 77(q)(a)(3).

COUNT IV

FRAUD IN VIOLATION OF SECTION 10(b) OF THE EXCHANGE ACT AND RULE 10b-5

46. The Commission realleges and repeats its allegations set forth at paragraphs 1 through 35 of this Complaint.

47. Since a date unknown but since at least May 1999 to the present, Defendants, Global Asset, Global Services, Global Internet and Haynes, directly and indirectly, by use of the means and instrumentality of interstate commerce, or of the mails, or of any facility of any national securities exchange, in connection with the purchase or sale of securities, as described herein, have knowingly, willfully or recklessly: (a) employed devices, schemes or artifices to defraud; (b) made untrue statements of material facts and omitted to state material facts necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; and/or (c) engaged in acts, practices and courses of business which operated, and would have operated as a fraud or deceit upon the purchasers of such securities.

48. By reason of the foregoing, Defendants Global Asset, Global Services, Global Internet and Haynes, directly or indirectly, have violated and, unless enjoined, will continue to violate Section 10(b) of the Exchange Act, 15 U.S.C. § 78j(b), and Rule 10b-5, 17 C.F.R. § 240.10b-5, thereunder.

COUNT V

**FRAUD IN VIOLATION OF
SECTION 15(a)(1) OF THE EXCHANGE ACT**

49. The Commission realleges and repeats its allegations set forth at paragraphs 1 through 35 of this Complaint.

50. Since a date unknown but since at least May 1999 to the present, Defendants, Global Asset, Global Services, Global Internet and Haynes, directly or indirectly, by use of the mails or any means or instrumentality of interstate commerce, while acting as a broker or dealer engaged in the business of effecting transactions in securities for the accounts of others, effected transactions in securities, or induced or attempted to induce the purchase or sale of securities, without registering as a broker-dealer in accordance with Section 15(a)(1) of the Exchange Act, 15 U.S.C. § 78o.

51. By reason of the foregoing, Defendants, Global Asset, Global Services, Global Internet and Haynes, directly and indirectly, violated and, unless enjoined, will continue to violate Section 15(a)(1) of the Exchange Act, 15 U.S.C. § 78o(a)(1).

RELIEF REQUESTED

WHEREFORE, the Commission respectfully requests that the Court:

I.

Declaratory Relief

Declare, determine and find that Defendants, Global Asset, Global Services, Global Internet and Haynes, committed the violations of the federal securities laws alleged herein.

II.

Permanent Injunctive Relief

Issue a Permanent Injunction, restraining and enjoining Defendants, Global Asset, Global Services, Global Internet and Haynes, their officers, agents, servants, employees, attorneys, and all persons in active concert or participation with them, and each of them, from violating: (i) Sections 5(a) and 5(c) of the Securities Act, 15 U.S.C. §§ 77e(a) and 77e(c); (ii) Section 17(a)(1) of the Securities Act, 15 U.S.C. § 77q(a); (iii) Sections 17(a)(2) and 17(a)(3) of the Securities Act, 15 U.S.C. §§ 77(q)(a)(2) and 77(q)(a)(3); (iv) Section 10(b) of the Exchange Act, 15 U.S.C. § 78j(b), and Rule 10b-5, 17 C.F.R. § 240.10b-5, thereunder and (v) Section 15(a)(1) of the Exchange Act, 15 U.S.C. § 78o(a)(1).

III.

Asset Freeze and Accounting

Issue an Order temporarily freezing all assets of Defendants, Global Asset, Global Services, Global Internet and Haynes, and Relief Defendant Centurion until further Order of the Court, and requiring accountings by Defendants Global Asset, Global Services, Global Internet and Haynes and Relief Defendant Centurion.

IV.

Disgorgement

Issue an Order requiring Defendants, Global Asset, Global Services, Global Internet and Haynes, and Relief Defendant Centurion, to disgorge all profits or proceeds that they have received as a result of the acts and/or courses of conduct complained of herein, with prejudgment interest.

V.

Penalties

Issue an Order directing Defendant Haynes to pay a civil fine and/or penalty 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. § 78(d)(3).

VI.

Appointment of Receiver

Issue an order appointing a Receiver of the assets of Defendants Global Asset, Global Services and Global Internet to marshal and safeguard all of said assets, and any other duties the Court deems appropriate, and to prepare a report to the Court and the Commission detailing the activities of all Defendants with respect to the conduct alleged herein and the whereabouts of investor funds.

VII.

Records Preservation

Issue an Order requiring Defendants, Global Asset, Global Services, Global Internet and Haynes, and Relief Defendant Centurion to preserve any records related to the subject matter of this lawsuit that are in their custody, possession or subject to their control.

VIII.

Repatriation of Investor Funds

Issue an Order requiring Defendants, Global Asset, Global Services, Global Internet and Haynes, and Relief Defendants Centurion, to repatriate from abroad all investor funds that they have received as a result of the acts and/or courses of conduct complained of herein that violate

Section 17(a) of the Securities Act and Section 10(b) of the Exchange Act. with prejudgment interest.

IX.
Further Relief

Grant such other and further relief as may be necessary and appropriate.

X.
Retention of Jurisdiction

Further, the Commission respectfully requests that the Court retain jurisdiction over this action in order to implement and carry out the terms of all orders and decrees that may hereby be entered, or to entertain any suitable application or motion by the Commission for additional relief within the jurisdiction of this Court.

Respectfully submitted,

Dated: ~~October 28~~ ^{September} 28, 2001

By: 

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NIGHT BOX FILED SEP 28 2006

CLARENCE MADDOX CLERK, USDC - SDF/LIMA

DEFENDANTS Global Asset Partners, Ltd., Global Services Group, LLC, Global Internet Fund Group, Inc., and William L. Haynes, Defendants, Centurion International, LLC, Relief Defendants.

I. (a) PLAINTIFFS

SECURITIES AND EXCHANGE COMMISSION

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF (EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT (IN U.S. PLAINTIFF CASES ONLY)

A-WPB/olw 8862 middlebrooks

NOTE: IN LAND CONDEMNATION CASES USE THE LOCATION OF THE TRACT OF LAND INVOLVED

(c) ATTORNEY'S FIRM NAME, ADDRESS AND TELEPHONE NUMBER: Teresa J. Verges, Esq. (305) 982-6384 Suzanne P. Pope, Esq. (305) 982-6392 SEC, 1401 Brickell Avenue, Suite 200 Miami, Florida 33131

ATTORNEYS (IF KNOWN): Carl F. Schoeppl, Esq. Russell C. Weigel III, Esq.

(d) CIRCLE COUNTY WHERE ACTION AROSE: DADE, MONROE, BROWARD, PALM BEACH, MARTIN, ST LUCIE, INDIAN RIVER, OKEECHOBEE HIGHLANDS

II. BASIS OF JURISDICTION

- 1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES

- Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country
Incorporated or Principal Place of Business in This State
Incorporated and Principal Place of Business in Another State
Foreign Nation

IV. ORIGIN

- 1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from another district (specify)
6 Multidistrict Litigation
Appeal to District Judge from Magistrate Judgment

V. NATURE OF SUIT

Table with 5 columns: A CONTRACT, A TORTS, FORFEITURE/PENALTY, A LABOR, A BANKRUPTCY, A OTHER STATUTES. Contains various legal categories and checkboxes.

VI. CAUSE OF ACTION

15 U.S.C. §§ 77e(a) and 77e(c); 15 U.S.C. § 77q(a)(1); 15 U.S.C. §§ 77(q)(a)(2) and 77(q)(3); 15 U.S.C. § 78j(b) and 17 C.F.R. § 240.10b-5; 15 U.S.C. § 78o; 15 U.S.C. § 78o(a)(1).

LENGTH OF TRIAL: Violations of the federal securities laws.

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER FRCP 23 DEMAND \$ Demand: Inj., Asset Freeze, Disgorgement, Civil Penalties. CHECK YES only if demanded in complaint. JURY DEMAND: YES NO

VIII. RELATED CASE(S) IF ANY

JUDGE DOCKET NUMBER

DATE: 9/28/06 SIGNATURE OF ATTORNEY OF RECORD: Teresa J. Verges, Senior Trial Counsel