

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
(Tampa Division)**

United States Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-4030
Plaintiff,

vs.

Aleksey Kamardin,
Defendant.

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: Civil Action No.
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COMPLAINT FOR INJUNCTIVE AND OTHER RELIEF

For its complaint against Aleksey Kamardin Plaintiff the United States Securities and Exchange Commission states as follows:

SUMMARY

1. This action is brought for violations of the Federal securities laws arising from the Defendant Aleksey Kamardin's course of conduct in using the Internet and the World Wide Web to regularly execute securities transactions in his account at approximately the same time that unsuspecting victims' accounts were intruded and high jacked to create liquidity and to manipulate the price of securities for Kamardin's pecuniary benefit. Defendant Kamardin devised and participated in a scheme whereby he bought shares of thinly-traded issues while others, acting in concert, surreptitiously usurped the online trading accounts of the victim investors at various broker-dealers, liquidated the investors' existing equity positions, and using the resulting proceeds purchased thinly-traded stocks in the investors' accounts in order to create the appearance of trading activity and to inflate the price of the stocks. Simultaneously with the unauthorized intrusions into these accounts, Kamardin sold off the shares he purchased in his

own account for a gain caused by the unauthorized, concurrent, intrusive trading of the same stocks without the knowledge of the account holder. Kamardin's gains resulted from his continued business of fraudulently manipulating stock prices by the buying and selling of the same stock on the same day in investor victim's accounts without their knowledge or authority.

2. Between July 13 and August 25, 2006, Kamardin carried on a business of trading in a total of seventeen (17) issuers whose stock prices were manipulated through unauthorized online intrusions into unknowing investors' accounts on the same days as his trades. In each of these instances, Kamardin made it a business to buy shares in a thinly traded issuer just prior to, or simultaneously with, intrusions into the client accounts of online broker-dealers. The intrusions were in order to sell any securities so that the client accounts became liquid and had funds to purchase the same issuer's securities which he had purchased in his own account, and shortly thereafter sell all of his shares at prices inflated by the sale of the issuer's stock in the victims' accounts. In all but three (3) of the fourteen (14) stocks he used Kamardin realized profits totaling \$82,960.18.

3. On August 28 and 29, 2006, Kamardin wired his ill-gotten proceeds from his online brokerage account to a domestic bank account, and subsequently transferred the funds to a second account owned by his Russian-born roommate. The roommate then immediately wired the funds to a bank account located in Riga, Latvia. Kamardin is believed to have fled from the United States to Russia to conceal his whereabouts.

4. By virtue of his conduct, Kamardin has engaged and, unless enjoined, will continue to engage, in violations of Section 17(a) of the Securities Act of 1933 [15 U.S.C. § 77q(a)] and Section 10(b) of the Securities Exchange Act of 1934 [15 U.S.C. § 78j(b)] and Rule 10b-5 promulgated thereunder [17 C.F.R. § 240.10b-5].

JURISDICTION AND VENUE

5. The Commission brings this action, and this Court has jurisdiction over this action, pursuant to authority conferred by Sections 20(b), 20(d) and 22(a) of the Securities Act [15 U.S.C. §§ 77t(b), 77t(a) 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].

6. This Court has personal jurisdiction over Kamardin and venue is proper in the Middle District of Florida pursuant to Section 27 of the Exchange Act [15 U.S.C. § 78aa] because many of the transactions, acts, practices, and courses of business constituting the violations alleged herein occurred within this District, because Kamardin carried on his course of conduct while located and residing in this District, and because several of the investor victims whose accounts were intruded and fraudulently used are residents of the State of Florida.

7. Kamardin, directly and indirectly, has made use of the means and instrumentalities of interstate commerce, and the means and instruments of transportation and communication in interstate commerce, in connection with the transactions, acts, practices, and courses of business alleged in this Complaint.

DEFENDANT

8. Kamardin is a twenty-one year old student whose last known address is 7009 Interbay Boulevard, Apartment 106, Tampa, Florida. At all relevant times, Kamardin had access to a computer which was connected to the Internet and the World Wide Web at his home. At all relevant times he maintained an Internet-accessible securities brokerage account at E*Trade Securities. According to his account opening application, Kamardin is a United States citizen and has a liquid net worth of \$15,000.

KAMARDIN'S FRAUDULENT SCHEME

9. While residing in Tampa, Florida, on July 13, 2006, Kamardin opened an online brokerage account at E*Trade titled in his individual name. .

10. From July 13 to August 25, 2006, Kamardin traded in seventeen (17) very thinly traded companies whose securities were the subject of unauthorized purchases and price manipulations on the same day Karmadin traded in the stocks. The accounts were intruded into at various broker-dealers, including E*Trade Securities, Scottrade, Inc., TD Ameritrade, Inc., J.P. Morgan Chase & Co. and Charles Schwab & Co., Inc.

11. Kamardin's trading pattern was the same for each intrusion. Kamardin would purchase in his account shares in a thinly traded stock on the same day, just prior to or simultaneously with, one or more intrusions into an online brokerage account. A series of unauthorized purchases of the same thinly traded stock purchased by Kamardin was made in other investors' accounts resulting in an increase in the price of the stock. Immediately, or shortly thereafter, Kamardin sold all of his shares in that stock at the inflated prices. Kamardin realized a profit from his fraudulent trading in all but three (3) of the seventeen (17) issues he manipulated. The account holders and the brokerage firms suffered direct losses from the intruders' control of their accounts and the fraudulently unauthorized purchases and sells of stock issues used by Kamardin.

KAMARDIN'S FRAUDULENT TRADES

12. Gales Industries, Inc. is a Bay Shore, NY-based manufacturer of aircraft structural parts quoted on the National Association of Securities Dealers' (NASD) Over-the-Counter Bulletin Board quotation service under the ticker symbol GLDS. On August 25, 2006, an account at TD Ameritrade was accessed by being "hacked" and the equity was used to purchase

GLDS shares. On August 25, GLDS opened at \$.50 per share and increased to an inter-day high of \$.70 per share on volume of 533,400 shares, compared to its 15-day average trading volume of 20,756 shares. Kamardin's trades in GLDS were as follows:

| | |
|-------------------------|--|
| 9:34 a.m. to 11:17 a.m. | Kamardin purchases 55,000 shares of GLDS at prices ranging from \$.50 to \$.55 per share. |
| 2:22 p.m. to 3:59 p.m. | A total of 245,000 GLDS shares are purchased in an intruded TD Ameritrade account. |
| 3:15 p.m. | Kamardin sells all 55,000 GLDS shares at \$.66 per share realizing a profit of \$7,008.95. |

13. Fuego Entertainment, Inc. is a Miami, Florida-based company purportedly engaged in the production and distribution of entertainment products. The company's shares are quoted on the Over-the-Counter Bulletin Board under the symbol FUGO. On August 24, 2006, one or more unauthorized intruders accessed accounts at E*Trade, TD Ameritrade, Schwab and Scottrade and purchased a total of 458,600 shares of FUGO. On August 24, FUGO opened at \$.88 per share and increased to an inter-day high of \$1.28 per share on volume of 1,118,070 shares, compared to its 15-day average trading volume of 2,280 shares. Kamardin's trades coincided as follows:

| | |
|-------------------------|---|
| 11:51 a.m. to 1:03 p.m. | Kamardin purchases 55,000 FUGO shares at prices ranging from \$.88 to \$1.15 per share. |
| 1:08 p.m. to 2:22 p.m. | A total of 199,000 FUGO shares are purchased in five intruded accounts at TD Ameritrade. |
| 1:39 p.m. to 1:40 p.m. | A total of 15,500 FUGO shares are purchased in an intruded account at Scottrade. |
| 1:51 p.m. to 3:04 p.m. | A total of 109,100 FUGO shares are purchased in three intruded E*Trade accounts. |
| 2:36 p.m. to 3:00 p.m. | A total of 135,000 FUGO shares are purchased in an intruded account at Schwab. |
| 2:19 p.m. to 3:05 p.m. | Kamardin sells all of his FUGO shares at prices ranging from \$1.20 to \$1.28 per share realizing a profit of \$9,164.28. |

14. ITEX Corp. is a Bellevue, Washington-based company that administers a cashless trade exchange. ITEX's shares also are quoted on the Over-the-Counter Bulletin Board, and trade under the symbol ITEX. On August 23, 2006, two accounts at TD Ameritrade were illegally accessed and the equity used to purchase ITEX shares. On August 23, ITEX opened at \$.58 per share and increased to an inter-day and 52-week high of \$.98 per share on volume of 1,588,001 shares, compared to its 15-day average trading volume of 11,583 shares. Kamardin realized a profit of more than \$15,000 through his trading in ITEX:

| | |
|--------------------------|--|
| 11:07 a.m. to 11:47 a.m. | Kamardin purchases 50,000 ITEX shares at prices ranging from \$.60 to \$.65 per share. |
| 12:10 p.m. to 1:14 p.m. | A total of 235,000 ITEX shares are purchased in two intruded TD Ameritrade accounts. |
| 12:46 p.m. | Kamardin sells all 50,000 of his ITEX shares at \$.94 per share realizing a profit of \$15,046.64. |

15. Butler National Corp. is an Olathe, Kansas, company providing electronic monitoring of water pumping stations, whose shares are quoted on the Over-the-Counter Bulletin Board under the symbol BUKS. On August 22, 2006, two accounts at E*Trade were impermissibly accessed and the equity was used to purchase 505,000 BUKS shares. On August 22, BUKS opened at \$.30 per share and increased to an inter-day high of \$.54 per share on volume of 1,327,903 shares, compared to its 15-day average trading volume of 30,401 shares. Once again, Kamardin profited generously from his trading:

| | |
|--------------------------|--|
| 11:13 a.m. to 12:22 p.m. | Kamardin purchases 94,900 BUKS shares at prices ranging from \$.32 to \$.38 per share. |
| 1:22 p.m. | A total of 15,000 shares are purchased in an intruded TD Ameritrade account. |
| 1:37 p.m. to 2:20 p.m. | A total of 165,000 BUKS shares are purchased in an intruded E*Trade account. |
| 1:45 p.m. to 2:50 p.m. | A total of 340,000 BUKS shares are purchased in a second intruded E*Trade account. |
| 2:15 p.m. to 2:32 p.m. | Kamardin sells all 94,900 BUKS shares at prices ranging from \$.44 to \$.48 per share realizing a profit of \$10,540.76. |

16. Thomas Equipment Ltd. is a Milwaukee, Wisconsin-based manufacturer and distributor of farm equipment whose shares are traded on the American Stock Exchange under the symbol THM. On August 21, 2006, accounts at E*Trade, TD Ameritrade and Schwab were accessed by “hacking” and the equity used to purchase THM shares. On August 21, THM opened at \$.26 per share and increased to an inter-day high of \$.80 per share on volume of 426,700 shares, compared to its 15-day average trading volume of 43,120 shares. Kamardin’s trading pattern was consistent with his other trades:

| | |
|------------------------|--|
| 2:10 p.m. to 2:36 p.m. | Kamardin purchases 43,000 THM shares at prices ranging from \$.42 to \$.43 per share. |
| 1:29 p.m. to 3:41 p.m. | An unauthorized intruder purchases a total of 60,900 THM shares in two TD Ameritrade accounts. |
| 3:28 p.m. | An unauthorized intruder purchases a total of 20,000 THM shares in a Schwab account. |
| 3:32 p.m. to 3:55 p.m. | An unauthorized intruder purchases a total of 68,000 THM shares in an E*Trade account. |
| 3:36 p.m. to 3:43 p.m. | Schwab cancels orders to purchase a total of 50,000 THM shares in a second intruded account. |
| 3:35 p.m. to 3:53 p.m. | Kamardin sells all 43,000 THM shares at prices ranging from \$.40 to \$.80 per share realizing a profit of \$13,158. |

17. Cyber Defense Systems, Inc. is a St. Petersburg, Florida, company whose shares are quoted on the Over-the-Counter Bulletin Board under the symbol CYDF. On August 18, 2006, one or more individuals intruded into an account at E*Trade and used the equity to purchase CYDF shares. On August 18, CYDF opened at \$.36 per share and increased to an inter-day and 52-week high of \$.85 per share on volume of 983,282 shares, compared to its 15-day average trading volume of 24,830 shares. Kamardin’s trades corresponded as follows:

| | |
|--------------------------|--|
| 10:04 a.m. to 10:41 a.m. | Kamardin purchases 39,000 CYDF shares at prices ranging from \$.36 to \$.40 per share. |
| 12:23 p.m. to 1:20 p.m. | A total of 67,406 CYDF shares are purchased in an intruded E*Trade account. |
| 12:28 p.m. to 1:31 p.m. | A total of 75,000 CYDF shares are purchased in two intruded TD Ameritrade accounts. |
| 12:39 p.m. to 1:11 p.m. | A total of 44,900 CYDF shares are purchased in an intruded Schwab account. |
| 1:12 p.m. | Kamardin sells all 39,000 CYDF shares for \$.73 per share realizing a profit of \$13,499.19. |

18. Northwater Resources, Inc. is purported to be a Vancouver-based mining company. Its shares are quoted on the Pink Sheets quotation service under the symbol NWRS. On August 11, 2006, accounts at E*Trade, J.P. Morgan and Scottrade were accessed by “hacking” and the equity was used to purchase NWRS shares. On August 11, NWRS opened at \$.90 per share and increased to an intraday and 52-week high of \$2.09 per share on volume of 748,220 shares, compared to its 15-day average trading volume of 2,305 shares. Kamardin’s trading pattern again was similar:

| | |
|--------------------------|--|
| 9:50 a.m. to 10:03 a.m. | Kamardin purchases 7,460 NWRS shares at prices ranging from \$1 to \$1.15 per share. |
| 9:43 a.m. to 11:08 a.m. | A total of 89,400 NWRS shares are purchased in two intruded accounts at Scottrade. |
| 10:04 a.m. to 11:14 a.m. | A total of 210,000 NWRS shares are purchased in an intruded J.P. Morgan account. |
| 10:39 a.m. to 11:10 a.m. | A total of 30,000 NWRS shares are purchased in an intruded E*Trade account. |
| 11:03 a.m. to 11:04 a.m. | Kamardin sells all of his NWRS shares at \$2 per share for a total profit of \$6,953.59. |

19. MCF Corporation is a San Francisco, California-based securities broker-dealer and investment bank whose shares are traded on the American Stock Exchange under the symbol MEM. On August 8, 2006, one or more unauthorized intruders accessed accounts at TD

Ameritrade, Schwab and Scottrade and purchased MEM shares. On August 8, 2006, MEM opened at \$.76 per share and increased to an inter-day high of \$.83 per share on volume of 808,400 shares, compared to its 15-day average trading volume of 509,360 shares. Kamardin's trades coincided as follows:

| | |
|---------------------------------------|---|
| Aug. 7, 2006 3:32 p.m. | Kamardin purchases 10,500 MEM shares at \$.76 per share. |
| Aug. 8, 2006 12:14 p.m. to 1:12 p.m. | An intruder purchases 175,200 MEM shares in two TD Ameritrade accounts. |
| Aug. 8, 2006 12:03 p.m. to 12:06 p.m. | A total of 45,000 MEM shares are purchased in an intruded Schwab account. |
| Aug. 8, 2006 10:03 a.m. to 1:10 p.m. | An intruder purchases 98,000 MEM shares in a Scottrade account. |
| Aug. 8, 2006 12:22 p.m. | Kamardin sells all of his MEM shares at \$.82 per share realizing a profit of \$348.75. |

20. Mamma.com, Inc., is a Canadian provider of online direct marketing services whose shares are traded on the Nasdaq Capital Market under the symbol MAMA. On August 2, 2006, an account at TD Ameritrade was accessed by "hacking" and the equity in the account used to purchase 118,000 shares of MAMA. On August 2, 2006, MAMA opened at \$1.07 per share and increased to an inter-day high of \$1.42 per share on volume of 293,093 shares, compared to its 15-day average trading volume of 47,610 shares. Once again, Kamardin purchased shares prior to the intrusion and sold them at the inflated prices:

| | |
|------------------------|---|
| 9:51 a.m. | Kamardin purchases 6,200 shares of MAMA at \$1.12 per share. |
| 2:09 p.m. to 3:24 p.m. | One or more unauthorized intruders buy a total of 118,000 MAMA shares in a TD Ameritrade account. |
| 3:40 p.m. | Kamardin sells his MAMA shares at \$1.32 per share realizing a profit of \$1,213.76. |

21. U.S. Lec Corp. is an Internet service provider operating out of Charlotte, North Carolina,

whose shares are traded on the Nasdaq Global Market under the symbol CLEC. On July 28, 2006, an account at E*Trade was illegally accessed and the equity was used to purchase shares of CLEC. On July 28, 2006, CLEC opened at \$3.54 per share and increased to an inter-day high of \$5.87 per share on volume of 880,615 shares, compared to its 15-day average trading volume of 44,738 shares. Kamardin's trades coincided as follows:

| | |
|--------------------------|--|
| 10:03 a.m. | Kamardin purchases 2,465 CLEC shares at \$3.65 per share. |
| 12:08 p.m. to 12:32 p.m. | A total of 200,000 shares of CLEC are purchased in an intruded account at E*Trade. |
| 12:38 p.m. | Kamardin sells his CLEC shares at \$4.85 per share realizing a profit of \$2,931.65. |

22. Kuhlman Company, Inc. is an apparel wholesaler and retailer based in Minneapolis, Minnesota, whose shares are traded on the American Stock Exchange under the symbol KUL. On July 24, 2006, an E*Trade account was illegally accessed and used to purchase shares of KUL. On July 24, KUL opened at \$.27 per share and increased to an inter-day high of \$.45 per share on volume of 442,900 shares, compared to its 15-day average trading volume of 110,600 shares. Kamardin's trading pattern again was similar:

| | |
|-------------------------|---|
| 12:41 p.m. to 2:19 p.m. | Kamardin purchases 15,000 KUL shares at \$.27 and \$.28 per share. |
| 3:11 p.m. | A total of 151,000 KUL shares are purchased in an intruded E*Trade account. |
| 3:12 p.m. | Kamardin sells all of his KUL shares at \$.44 per share realizing a profit of \$2,124.82. |

23. Quantum Energy, Inc. is a purported British Columbia-based oil and gas exploration company whose shares are quoted on the Over-the-Counter Bulletin Board under the symbol QEGY. On July 24, 2006, a total of four (4) accounts at E*Trade were surreptitiously accessed and the equity in the accounts used to purchase shares of QEGY. On July 24, 2006, QEGY

opened at \$2.45 per share and increased to an inter-day high of \$2.53 per share on volume of 805,893 shares, compared to its 15-day average trading volume of 182,627 shares. Kamardin's trades corresponded as follows:

| | |
|------------------------|--|
| 10:01 a.m. | Kamardin purchases 1,600 QEGY shares at \$3.65 per share. |
| 9:33 a.m. to 1:34 p.m. | A total of 268,650 shares of QEGY are purchases in four intruded E*Trade accounts. |
| 11:55 a.m. | Kamardin sells his QEGY shares at \$2.52 per share realizing a profit of \$53.89. |

24. WTS Dime Bancorp, Inc. is a New York-based company currently in bankruptcy whose shares trade as litigation tracking warrants on the Nasdaq Global Market under the symbol DIMEZ. On July 21, 2006, an intruder accessed an account at E*Trade and purchased shares of DIMEZ. On July 21, DIMEZ opened at \$.13 per share and increased to an inter-day high of \$.14 per share on volume of 514,514 shares. The prior 15-day average trading volume for DIMEZ was 1,478,250 shares, an aberration apparently due to a number of intrusions and large unauthorized purchases at other broker-dealers on July 6, 2006. Kamardin made approximately \$84 from his trading in DIMEZ, but his trading pattern was similar to the other trades:

| | |
|---|---|
| July 17, 2006 3:08 p.m. | Kamardin purchases 20,000 DIMEZ shares at \$.13 per share. |
| July 21, 2006 3:40 p.m. to 3:43 p.m. | A total of 140,400 shares of DIMEZ are purchased in an intruded account at E*Trade. |
| July 21, 2006 2:19 p.m. | Kamardin sells his DIMEZ shares at \$.14 per share realizing a profit of \$83.93. |

25. eLinear, Inc. is a Houston, Texas-based provider of information technology services whose shares on July 14, 2006 were traded on the American Stock Exchange under the symbol ELU. On July 14, an intruder impermissibly accessed an account at TD Ameritrade and purchased 130,000 shares of ELU stock. ELU opened on July 14 at \$.20 per share and increased

to an inter-day high of \$.45 per share on volume of 1,149,500 shares, compared to its 15-day average trading volume of 53,293 shares. Kamardin's trades corresponded as follows:

| | |
|--|---|
| July 13, 2006 2:54 p.m. to 3:06 p.m. | Kamardin purchases 10,000 shares of ELU at \$.21 per share. |
| July 14, 2006 12:41 p.m. to 12:51 p.m. | A total of 130,000 ELU shares are purchased in an intruded TD Ameritrade account. |
| July 14, 2006 10:21 a.m. | Kamardin sells all of his ELU shares at \$.33 per share for a profit of \$831.88. |

26. As a result of his fraudulent trading in the seventeen (17) issuers, Kamardin netted a total profit of \$82,960.18.

27. On August 28 and 29, 2006, Kamardin wired all of his ill-gotten proceeds from his E*Trade account to a Wachovia bank account, and subsequently transferred the funds to a second account titled in the name of his Russian-born roommate. The roommate then immediately wired the funds overseas to a bank account located in Riga, Latvia.

**CLAIMS FOR RELIEF
COUNT I**

**Violations of Section 17(a) of the Securities Act
[15 U.S.C. § 77q(a)]**

28. The Commission re-alleges and incorporates by reference paragraphs 1 through 27 above.

29. Kamardin, in the offer or sale of securities, by the use of the means or instruments of transportation or communication in interstate commerce or by the use of the mails, directly or indirectly employed devices, schemes, or artifices to defraud, obtained money or property by means of untrue statements of material facts or omissions to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made,

not misleading, or engaged in acts, practices, or courses of business which operate or would operate as a fraud or deceit upon the purchasers of such securities with scienter.

30. By reason of the foregoing, Kamardin has violated Section 17(a) of the Securities Act [15 U.S.C. § 77q(a)].

COUNT II

Violations of Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5]

31. The Commission re-alleges and incorporates by reference paragraphs 1 through 30 above.

32. Kamardin, in connection with the purchase or sale of securities, by use of the means or instrumentalities of interstate commerce or by the use of the mails or of the facilities of a national securities exchange, directly or indirectly, employed devices, schemes, or artifices to defraud, made untrue statements of material facts or 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, or has engaged in acts, practices, or courses of business which operate, or would operate, as a fraud or deceit upon any person with scienter.

33. By reason of the foregoing, Kamardin has violated Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5].

PRAYER FOR RELIEF

WHEREFORE, the Commission respectfully requests that this Court enter a judgment that:

I.

Permanently restrains and enjoins Kamardin, and his agents, servants, employees, attorneys, and all persons in active concert or participation with him 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, Section 10(b) of the Exchange Act, and Rule 10b-5 thereunder;

II.

Orders Kamardin to disgorge all monies obtained through the illegal and fraudulent activities stated, plus prejudgment and post judgment interest thereon, as well as to pay civil penalties pursuant to Section 20(d) of the Securities Act and Section 21(d) of the Exchange Act; and

III.

Grants such other relief as this Court deems just and proper.

January 22, 2007

Respectfully Submitted,

S/ Carl A. Tibbetts

Carl A. Tibbetts, Trial Counsel
Assistant Chief Litigation Counsel
John Reed Stark, Chief
Thomas A. Sporkin, Deputy Chief
Office of Internet Enforcement
N. Blair Vietmeyer, Senior Counsel
Sarit Klein, Senior Counsel
Attorneys for Plaintiff,
**U.S. SECURITIES AND EXCHANGE
COMMISSION**
100 F Street, N.E.
Washington, D.C. 20549-4030
(202) 551-4483 (Tibbetts)
(202) 772-9245 (Fax)
Email: TibbettsC@Sec.Gov