

**JUDGE BAFF**

**07 CV 2762**

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APR 05 2007

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

**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**-against-**

**ALEXIS AMPUDIA,  
a/k/a ALEXIS GEANCARLOS AMPUDIA NAVALO,  
a/k/a ALEXIS EMIAS, a/k/a ALEXIS ROJAS,**

**Defendant.**

**07 CV \_\_\_\_ ( )**

**COMPLAINT**

Plaintiff Securities and Exchange Commission ("Commission"), for its Complaint against defendant Alexis Ampudia, also known as Alexis Geancarlos Ampudia Navalo, Alexis Emias and Alexis Rojas ("Ampudia" or the "Defendant"), alleges:

**SUMMARY**

1. The Commission brings this emergency action to halt a securities fraud scheme in which Ampudia combined identity theft with market manipulation. Ampudia purchased thinly-traded securities at cheap prices in his own brokerage account. He then used stolen identities to open online brokerage accounts in the names of unsuspecting identity theft victims and bought

securities of the same companies to increase artificially the securities' price. Ampudia profited by selling his own securities at artificially inflated prices. Ampudia is continuing to steal the identities of innocent victims and to use their identities to perpetrate securities fraud.

2. Since at least November 2006, Ampudia has stolen the identities of at least eight individuals ("Victims") and opened at least nine online brokerage accounts in the names of the Victims without their knowledge or consent (the "Victims' Brokerage Accounts"). During the course of his scheme, Ampudia transferred at least approximately \$1,038,250 from the Victims' bank accounts to fund the Victims' Brokerage Accounts. Ampudia then used the funds to purchase thinly-traded securities (the "targeted securities") in the Victims' Brokerage Accounts at artificially inflated prices.

3. As the price of the targeted securities surged, Ampudia sold his personal holdings of the targeted securities that he had previously purchased at lower prices. The Victims' broker-dealers suffered losses of at least approximately \$269,704 as a result of Ampudia's conduct.

4. Ampudia utilized this scheme to purchase and sell the securities of at least five different companies and has received at least \$140,000 in unlawful profits.

5. By this action, the Commission seeks to terminate this ongoing fraudulent activity, prevent the dissipation of Ampudia's assets, and compel an accounting of funds. The Commission brings this action to obtain a temporary restraining order, preliminary and permanent injunctions preventing further violations of the antifraud provisions of the federal securities laws, disgorgement of ill-gotten gains and prejudgment interest thereon, and civil penalties, and to obtain other equitable relief.























