

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

FILED
JUL 14 2008
Phil Lombardi, Clerk
U.S. DISTRICT COURT

SECURITIES AND EXCHANGE COMMISSION, :

Plaintiff, :

v. :

MARK BYRON LINDBERG, :

Defendant. :

Civil Action No.

08 CV - 402 CVE SAJ

COMPLAINT

Plaintiff Securities and Exchange Commission (the "Commission") alleges:

SUMMARY

1. This is a market manipulation and scalping case concerning Defendant Mark Lindberg's role in a Shell Creation Group ("SCG") that manipulated at least three penny stocks from 2004 through 2006, by means of promotional materials and coordinated trading activity and reaped profits in excess of \$20 million. The three stocks were National Storm Management Group, Inc. ("NLST"), Deep Rock Oil and Gas, Inc. ("DPRK"), and Global Beverages Solutions, Inc. ("GBVS). Two of these manipulations attempted to take advantage of investors' emotions during the Hurricane Katrina and Rita crises in the summer and fall of 2005. Lindberg and other key members of the SCG were supported by numerous other individuals, as well as nominee entities that the SCG beneficially owned and/or controlled. Acting in concert, the SCG helped to set up and finance these three companies and profited from selling shares of each into the rising market generated by SCG orchestrated false and misleading publicity and manipulative coordinated trading. Mark Lindberg personally reaped millions of dollars in ill-gotten gains from this illegal conduct.

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