

ORIGINAL CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

SECURITIES AND EXCHANGE COMMISSION

804 CV 2098-M

(b) County of Residence of First _____
(EXCEPT IN U.S. PLAINTIFF CASES)

DEFENDANTS

KELLY, MARK; LATVAHO, CHAD;;
ANGEL, MARTIN S. and BUCK, JOHN R.

County of Residence of First Listed Dallas, Texas
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE
LAND INVOLVED.

(c) Attorney's (Firm Name, Address, and Telephone Number)

Securities and Exchange Commission
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San Francisco, CA 94102
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Attorneys (If Known)

SEE ATTACHMENT

II. BASIS OF JURISDICTION

(Place an "X" in One Box Only) **CITIZENSHIP OF PRINCIPAL PARTIES** (For Diversity Cases Only)

- ☒ 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)

- Citizen of This State ☐ 1 ☐ 1 Incorporated or Principal Place of Business In This State
- Citizen of Another State ☐ 2 ☐ 2 Incorporated and Principal of Business In Another State
- Citizen or Subject of a Foreign Country ☐ 3 ☐ 3 Foreign Nation ☐ 6 ☐ 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury—Med. Malpractice <input type="checkbox"/> 365 Personal Injury—Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage, Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609

V. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

- ☒ 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
- ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

(Cite the U.S. Civil Statute under which you are filing and write brief statement of cause.)

Do not cite jurisdictional statutes unless diversity.)

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

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

ATTACHMENT TO CIVIL COVER SHEET
SECURITIES AND EXCHANGE COMMISSION v. MARK KELLY, CHAD
LATVAHO, MARTIN S. ANGEL, and JOHN R. BUCK

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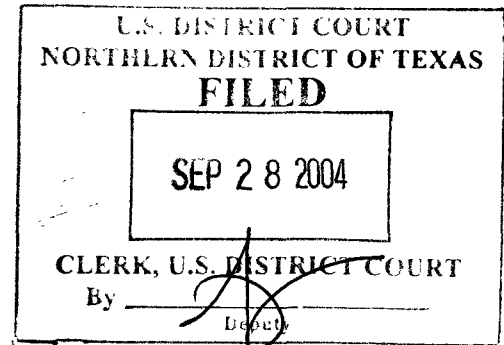
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304 CV 2098-M

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

MARK KELLY, CHAD LATVAHO,
MARTIN S. ANGEL, and
JOHN R. BUCK,

Defendants.

Case No.

COMPLAINT FOR A
PERMANENT
INJUNCTION, CIVIL
MONETARY PENALTIES
AND OTHER RELIEF

JURY TRIAL DEMAND

For its Complaint, plaintiff United States Securities and Exchange Commission (“Commission”) alleges against defendants Mark Kelly (“Kelly”), Chad Latvaaho (“Latvaaho”), Martin Angel (“Angel”) and John Buck (“Buck”) (collectively, “Defendants”):

INTRODUCTION

1. This is an insider trading case arising from Kelly’s tip of information about a forthcoming corporate merger to two of his long-time friends so that they could profit by purchasing short-term call options. As the chief financial officer of Dallas-based Auto One Finance (“Auto One”), Kelly learned in early May 2002 that Citibank, F.S.B. (“Citibank”) was planning to acquire Auto One’s parent company, Golden State Bancorp, and that he was to work at a Dallas hotel to assist Citibank’s representatives in conducting their due diligence. Rather than using that valuable, and highly confidential, information about the acquisition for its intended purpose of assisting Golden State Bancorp in consummating the merger, Kelly told Latvaaho and Angel that Golden State Bancorp was being acquired.

2. Latvaaho and Angel then purchased call options on Golden State Bancorp stock and tipped others about the merger. Latvaaho provided information about the acquisition to a friend, who then purchased Golden State Bancorp call options, while Angel told Buck about the acquisition. Buck purchased Golden State Bancorp call options and shares for himself, and also purchased Golden State Bancorp shares for two investment accounts under his control. When Citibank announced its proposed acquisition of Golden State Bancorp in late May 2002, Latvaaho, Angel and Buck derived a combined profit of approximately \$250,000 from their call option and stock purchases. Afterwards, Kelly arranged with Latvaaho and Angel to provide a false cover story for their insider trading by claiming that they purchased call options based upon their independent

research of Golden State Bancorp, and not based upon Kelly's tip to them of the planned acquisition.

JURISDICTION AND VENUE

3. The Commission brings this action pursuant to Sections 21(d), 21(e) and 21A of the Securities Exchange Act of 1934 ("Exchange Act"). 15 U.S.C. §§ 78u(d), 78u(e) and 78u-1. This Court has jurisdiction over the Commission's action pursuant to Sections 21(e), 21A and 27 of the Exchange Act. 15 U.S.C. §§ 78u(e), 78u-1 and 78aa.

4. Defendants directly or indirectly made use of the means or instrumentalities of interstate commerce, or of the mails, or of the facilities of a national securities exchange in connection with the transactions, acts, practices and courses of business alleged herein. Defendants directly and indirectly have engaged in transactions, acts, practices and courses of business that constitute violations of Section 10(b) of the Exchange Act and Rule 10b-5 promulgated thereunder. 15 U.S.C. § 78j(b); 17 C.F.R. § 240.10b-5 (2004).

5. Venue in the Northern District of Texas is proper pursuant to Section 27 of the Exchange Act. 15 U.S.C. § 78aa. Three of the Defendants resides in this District, and some of the alleged wrongful conduct occurred in the Northern District.

6. Assignment to the Dallas Division is appropriate because defendants Kelly, Angel and Buck reside in Dallas and because many of the pertinent events occurred there.

GENERAL ALLEGATIONS

Kelly's Relationship With Angel, Latvaaho and Buck

7. Kelly joined Auto One, a Dallas-based automobile financing company, in 1994. At the time, Auto One was owned by Millard Morris. When he joined Auto One, Kelly met Angel and Buck, who were officers of Auto One, and the three worked together until 1997. Kelly and Angel

also became best friends while working together, and have maintained their close friendship to the present time. Additionally, Kelly became friends with Latvaaho, who performed automobile repossessions for Auto One.

8. In 1996, Millard Morris sold Auto One to Golden State Bancorp, a Delaware corporation based in San Francisco, California. At the time, Golden State Bancorp was a bank holding company that owned financial institutions including Glendale Federal Savings and CalFed Bank. Golden State Bancorp's common stock traded on the New York Stock Exchange under the symbol "GSB" and its options traded on the American Stock Exchange. Following the sale, Angel resigned from Auto One, and is now the president of Marine One Finance. Buck also resigned from Auto One, and is now the president of Dumont Management Group. Both Marine One Finance and Dumont Management Group are owned by Millard Morris.

9. Kelly remained with Auto One following its sale to Golden State Bancorp, and became Auto One's chief financial officer in 1997. As chief financial officer, Kelly frequently had the assignment of conducting due diligence into possible acquisitions by Auto One. Kelly worked closely with Randy Staff ("Staff"), a vice president of Golden State Bancorp, on some of those due diligence projects. Staff reported to Gerald Ford, the chief executive officer of Golden State Bancorp.

Kelly's Knowledge of Citicorp's Proposed Acquisition

10. On April 3, 2002, Gerald Ford met with Robert Willumsted, the president of Citigroup, Inc., to discuss a possible acquisition of Golden State Bancorp by Citibank. Shortly after the meeting, Golden State Bancorp retained the Goldman Sachs investment banking firm to provide financial advice regarding a possible acquisition by Citibank.

11. On April 10, 2002, Gerald Ford met again with Willumsted to discuss the price and terms of a potential acquisition by Citibank of Golden State Bancorp. On April 26, 2002, Gerald Ford and Willumsted reached a tentative agreement on the price and terms of Citibank's potential acquisition of Golden State Bancorp.

12. Subsequently, on May 9, 2002, Auto One's president, Daniel Leonard ("Leonard"), told Kelly about Citibank's proposed acquisition of Golden State Bancorp. He instructed Kelly to clear his calendar so that Kelly would be available for due diligence meetings in Dallas, Texas with representatives of Citibank.

Kelly Tips Angel and Latvaaho About the Proposed Acquisition

13. On the same day that he learned of the planned acquisition, Kelly spoke by telephone with Angel. During the telephone conversation, Kelly told Angel that they could not play golf that weekend because Kelly had to work. Kelly also told Angel that Golden State Bancorp was being acquired.

14. Based upon the information he received from Kelly, Angel purchased 330 call option contracts – representing the right to purchase 33,000 shares of Golden State Bancorp at a price of between \$35 and \$40 per share – during the period of May 10, 2002 to May 17, 2002. When he purchased those call option contracts, Angel was purchasing an ostensibly risky security because the price of Golden State Bancorp's stock was currently below \$35 per share. As a result, unless Golden State Bancorp's share price increased within the next five weeks, Angel would lose all of his investment on the call option contracts.

15. Angel told co-workers about his conversation with Kelly and the news that Golden State Bancorp was being acquired. One of those co-workers was Buck, the good friend of both Kelly

and Angel. Using the information from Kelly and Angel, Buck purchased 150 call option contracts – representing the right to purchase 15,000 Golden State Bancorp shares at a price between \$35 and \$40 per share – between May 10 and May 17, 2002. Like Angel’s option purchase, Buck’s investment was ostensibly risky because he would lose his money on the call option contracts unless Golden State Bancorp’s stock price rose in the near future. Buck also purchased 2,000 shares of Golden State Bancorp. Buck furthermore purchased a total of 34,000 Golden State Bancorp shares for two investment accounts that he managed.

16. On May 9, 2002, Kelly also had a telephone conversation with his friend, Latvaaho. Kelly told Latvaaho that Kelly had to cancel a planned trip to a business conference and a future fishing trip. Kelly also told Latvaaho that Golden State Bancorp was being sold and that the transaction would be profitable for Kelly because he owned stocks and options. Kelly also told Latvaaho, who did repossession work for Auto One, that Latvaaho should not worry about having his repossession bills paid because the Golden State Bancorp’s buyer was paying a large amount of money. On May 15, 2002, Latvaaho used the information provided by Kelly to purchase 100 call option contracts – representing the right to purchase 10,000 Golden State Bancorp shares at the price of \$35 per share. Because Golden State Bancorp’s stock was trading at under \$35 per share, Latvaaho would lose his investment in the options contracts unless the price for Golden State Bancorp’s stock rose above \$35 per share in the next few weeks.

17. Latvaaho also told his friend, John Snyder (“Snyder”), that he was purchasing call option contracts on Golden State Bancorp shares and that Golden State Bancorp’s stock was a good deal. Based on that information, on May 20, 2002, Snyder purchased 50 call option contracts – representing the right to purchase 5,000 Golden State Bancorp shares at \$35 per share. Because

Golden State Bancorp's stock was currently trading at under \$35 per share, Snyder would lose his investment in the options contracts unless the price rose above \$35 per share in the next few weeks.

18. After Citibank announced the proposed acquisition of Golden State Bancorp on May 21, 2002 following the market's close, the price of Golden State Bancorp's shares rose eight percent the next day to a closing price of \$39.34. Angel sold his Golden State Bancorp call option contracts that same day for a net profit on \$62,437. Buck sold his Golden State Bancorp call option contracts and shares on May 22, 2002 for a net profit of \$49,076. Buck also sold the Golden State Bancorp shares in the two accounts managed by him for a net profit of \$106,601. Latvaaho sold his Golden State Bancorp call option contracts on May 22, 2002 for a net profit of \$30,857. Snyder sold his Golden State Bancorp call option contracts on May 22, 2002 for a net profit on \$8,649.

Kelly Arranges A Cover-up Of His Tipping And His Friends' Insider Trading

19. After Angel, Buck and Latvaaho traded in Golden State Bancorp, Kelly tried to coordinate an "innocent" explanation for their trading. On or about May 20, 2002, Kelly e-mailed an article to Kelly about Golden State Bancorp. That article discussed speculation that Golden State Bancorp might be a take-over candidate. Kelly's purpose in sending the article to Angel was to try to provide Angel with a purported explanation for his decision to purchase Golden State Bancorp call option contracts after being tipped by Kelly.

20. Kelly also tried to provide Latvaaho with an explanation for his trading. Kelly told Latvaaho to say that Kelly had merely suggested that Golden State Bancorp might be a good investment and that Latvaaho then did his own research before investing in Golden State Bancorp. Kelly also said that only a few people knew that he had passed along information about the proposed acquisition and that nothing could be proven against them if they all stuck to their story. Kelly also

said that he would go to jail if Latvaaho disclosed the source of his information about Golden State Bancorp.

LEGAL CLAIMS

FIRST CAUSE OF ACTION

(Insider Trading Against All Defendants)

21. The allegations in paragraphs 1 through 20, above, are incorporated herein by reference as though fully set forth.

22. By virtue of his employment as the chief financial officer of a Golden State Bancorp subsidiary and work on the acquisition due diligence for Golden State Bancorp, Kelly was an insider of Golden State Bancorp. Kelly therefore owed a fiduciary duty to Golden State Bancorp and its securities holders not to trade in Golden State Bancorp securities, either directly or indirectly, based on material, nonpublic information and not to use such information for his own benefit. Kelly breached that duty when he disclosed material, non-public information about Golden State Bancorp to Angel and Latvaaho on May 9, 2002 so that they could profit from the information. By reason of their long-time, close personal relationship, Kelly obtained a personal, non-monetary benefit by disclosing this information to Angel and Latvaaho so that Angel and Latvaaho could trade and tip others, including Buck.

23. By virtue of their familiarity with Kelly and his employment by a Golden State Bancorp subsidiary, Angel, Latvaaho and Buck knew or had reason to know that Kelly was acting in breach of his fiduciary duty to Golden State Bancorp and its securities holders by disclosing on May 9, 2002, the material, non-public information about the acquisition of Golden State Bancorp. As a result, Angel, Latvaaho and Buck had the duty to refrain from misusing the non-public

information about Golden State Bancorp by trading in the securities of Golden State Bancorp. Angel, Latvaaho and Buck breached that duty by purchasing Golden State Bancorp call options and/or stock between May 10, 2002 and May 15, 2002.

24. Angel also had the duty not to misuse the information by tipping other persons about the proposed acquisition so that those other persons could also trade in the securities of Golden State Bancorp. Angel breached that duty when he provided information about the acquisition of Golden State Bancorp to Buck so that Buck could purchase Golden State Bancorp securities.

25. Defendants, with scienter, directly or indirectly:

- a. employed devices, schemes, or artifices to defraud;
- b. 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; and
- c. engaged in acts, practices, or courses of business which operated or would operate as a fraud or deceit upon other persons, including purchasers and sellers of securities;

in connection with the purchase or sale of securities, by the use of means or instrumentalities of interstate commerce, of the mails, or the facilities of a national securities exchange.

26. By reason of the foregoing, Defendants violated, and unless restrained and enjoined will continue to violate, 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:

A. Permanently enjoin Defendants and their agents, servants, employees and attorneys, and those persons in active concert or participation with them who receive actual notice of the final judgment of permanent injunction by personal service or otherwise, and each of them, from directly

or indirectly violating 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;

B. Enter an Order requiring Defendants to disgorge an amount equal to their illegal trading profits from the securities transactions complained of herein, plus prejudgment interest;

C. Enter an Order requiring Defendants to pay civil penalties under Section 21A of the Exchange Act [15 U.S.C. § 78u 1]; and

D. Grant such other relief as this Court may deem just and appropriate.

Date: September 24, 2004

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Cary S. Robnett
Kevin M. Gross

By: 

John S. Yun

Attorneys for Plaintiff

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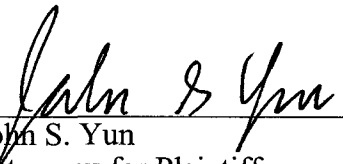
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DEMAND FOR JURY TRIAL

Plaintiff Securities and Exchange Commission hereby requests a trial by jury.

September 24, 2004

SECURITIES AND EXCHANGE COMMISSION

By: 
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Attorneys for Plaintiff