

01 CV - 9057

Wayne M. Carlin (WC-2114)
Securities and Exchange Commission
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

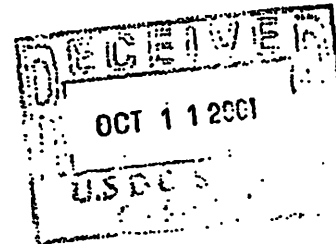
SECURITIES AND EXCHANGE COMMISSION

Plaintiff,

v.

RAMOIL MANAGEMENT, LTD., d/b/a JUMP
AUTOMOTIVE EXPERTS, INC.; EDWARD A.
DURANTE, a/k/a ED SIMMONS; BERKSHIRE
CAPITAL PARTNERS, INC.; DOTTEHNOFF
FINANCIAL LTD.; GALTON SCOTT & GOLETT
INC.; COMMONWEALTH ASSOCIATES, LTD.;
PROVIDENT PARTNERS, LTD.; FAIRMONT
CONSULTING, INC.; ZIMMENN IMPORTING AND
EXPORTING, INC.; TREVOR KOENIG; RODOLJUB
"MISHA" RADULOVIC; ALEXANDER
TAFLEVICH; THOMAS HAUKE; MONEESH K.
BAKSHI,

Defendants.



01 Civ.

COMPLAINT

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

NATURE OF THE ACTION

1. This action concerns Defendants' fraudulent scheme to manipulate the public market for Ramoil Management Ltd. ("RAMO") common stock. The scheme took place during the period from approximately December 1999 to July 2000 and involved: (a) creating large blocks

of purportedly unrestricted shares in violation of the registration provisions of the federal securities laws; (b) executing manipulative public market trades to create artificial increases in the trading volume and price of RAMO's common stock, which was quoted on the NASD's Over-The-Counter Bulletin Board ("OTC-BB"); and (c) issuing false and misleading press releases and Commission filings.

2. As a result, between December 1999 and February 2000, RAMO's stock price rose from a low of \$7.0625 per share to an all time high of \$20.00 per share. Between March and early April 2000, RAMO traded at prices that slowly fell from \$16.00 per share to \$8.00 per share. On April 14, 2000, RAMO declared a 5-to-1 forward stock split. RAMO traded at prices ranging between \$2.125 and \$1.00 per share for several months after the stock split, until around June 2000, when its share price began a rapid and steady decline to its current range of under \$.10 per share.

3. Defendant Edward A. Durante ("Durante"), while operating under the alias "Ed Simmons," used multiple offshore entities to hide his involvement in the manipulation of RAMO between at least December 1999 and July 2000. Durante engaged in manipulative trading in order to inflate RAMO's stock price. Durante then sold over one million RAMO shares to unsuspecting investors at artificially high prices, reaping profits of approximately \$3.3 million. Defendant Trevor Koenig ("Koenig") acted as Durante's broker during the course of the scheme and executed all of the manipulative trades on Durante's behalf through various nominee accounts controlled by Durante.

4. Defendants Rodoljub Radulovic ("Radulovic") and Alexander Taflevich ("Taflevich") caused RAMO to distribute several materially false and misleading press releases

and Commission filings. These misrepresentations concerned: RAMO's purported attempts to become listed on the NASDAQ Small Cap market; baseless revenue and profit predictions related to construction projects RAMO claimed to be involved with in the United Arab Emirates ("UAE"); certain consulting agreements RAMO claimed to have entered into; and a forged audit opinion concerning RAMO's 1999 year-end financial statements. The forged audit opinion was prepared by Defendant Thomas Hauke ("Hauke"), a licensed CPA, and the fraudulent Commission filings were prepared by Defendant Moneesh K. Bakshi ("Bakshi"), RAMO's corporate lawyer. Radulovic and Taflevich also provided Durante with over one million purportedly unrestricted RAMO shares in order to give Durante with control over RAMO's public float to implement the manipulation scheme.

5. By knowingly or recklessly engaging in the fraudulent conduct described herein, Defendants RAMO, Durante, Koenig, Radulovic, Taflevich, Bakshi and the related offshore entities violated the antifraud provisions of the federal securities laws, specifically, Sections 17(a) of the Securities Act of 1933 ("Securities Act") [15 U.S.C. § 77q(a)], and Section 10(b) of the Securities Exchange Act of 1934 ("Exchange Act") [15 U.S.C. § 78j(b)], and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5].

6. By knowingly or recklessly engaging in the fraudulent conduct described herein, Defendant Hauke violated the antifraud provisions of the federal securities laws, specifically, Section 10(b) of the Securities Exchange Act of 1934 ("Exchange Act") [15 U.S.C. § 78j(b)], and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5].

7. By engaging in the conduct described herein, Defendants RAMO, Durante, Radulovic, Taflevich, Bakshi, and the related offshore entities violated the registrations

provisions of the federal securities laws, specifically, Sections 5(a) and 5(c) of the Securities Act [15 U.S.C. §§ 77e(a), 77e(c)].

8. By engaging in the conduct described herein Defendant RAMO violated the reporting provisions of the federal securities laws, specifically, Section 15(d) of the Exchange Act [15 U.S.C. § 78o(d)] and Rules 15d-1 and 15d-13 thereunder [17 C.F.R. §§ 240.15d-1, 240.15d-13]. Defendants Radulovic and Taflevich are liable for RAMO's violations of Section 15(d) of the Exchange Act and Rule 15d-1 thereunder as a controlling person of RAMO pursuant to Section 20(a) of the Exchange Act [15 U.S.C. § 78t(a)]. Defendants Hauke and Bakshi are liable for RAMO's violations of Section 15(d) of the Exchange Act and Rule 15d-1 thereunder as aiders and abettors pursuant to Section 20(e) of the Exchange Act [15 U.S.C. § 78t(e)].

9. The SEC seeks an order permanently enjoining these Defendants from future violations, requiring disgorgement of their illegal profits, and other relief, pursuant to Sections 20(b) and 20(d)(1) of the Securities Act [15 U.S.C. §§77t(b) and 77t(d)(1)], Sections 21(d)(1) and (e) of the Exchange Act [15 U.S.C. §§78u(d)(1) and (e)]. Unless enjoined, the Defendants will continue to engage in transactions, acts, practices and courses of business similar to those described herein. The SEC also seeks an award of civil penalties, pursuant to Section 20(d) of the Securities Act [15 U.S.C. §77t(d)] and Section 21(d)(3) of the Exchange Act [15 U.S.C. §78u(d)(3)]. The violations described below involve fraud, deceit or deliberate or reckless disregard of regulatory requirements, and have resulted in substantial losses or significant risk of substantial losses to other persons.

JURISDICTION

10. This Court has jurisdiction of this action pursuant to Section 22(a) of the Securities Act [15 U.S.C. §§ 77v(a)] and Section 27 of the Exchange Act [15 U.S.C. § 78aa]. Certain of the transactions, acts, practices, and courses of business alleged herein occurred within this District, and venue is proper pursuant to Section 22(a) of the Securities Act and Section 27 of the Exchange Act.

11. Defendants, directly or indirectly, have made use of the means and instrumentalities of interstate commerce, or of the mails, or of the facilities of a national securities exchange in connection with the acts, practices, and courses of business alleged herein.

DEFENDANTS

12. Ramoil Management Ltd. ("RAMO") is a Delaware corporation with its principal offices in Las Vegas, Nevada. During the relevant period, RAMO's offices were based in Boca Raton, Florida. RAMO's common stock was quoted on the OTC-BB between January 2000 and March 2001. On March 28, 2001, RAMO was removed from the OTC-BB by the NASD for failing to file current financial statements with the Commission in accordance with Regulation S-X. Although RAMO is a reporting company, it has failed to make its required filings since September 30, 2000. On September 17, 2001, RAMO announced a name change to Jump Automotive Experts, Inc.

13. Edward A. Durante ("Durante"), age 50, is a stock promoter and a former registered securities professional who resides in Gardiner, New York. Using the alias "Ed Simmons," Durante founded several offshore entities, which he used to conceal his illegal stock promotion

and manipulative trading activities. One of these offshore entities was Carib Securities, Ltd. ("Carib"), located in the Turks & Caicos Islands.

14. **Berkshire Capital Partners, Inc. ("Berkshire"), Dottenhoff Financial Ltd. ("Dottenhoff"), Galton Scott & Golett Inc. ("Galton"), Commonwealth Associates, Ltd. ("Commonwealth Associates"), Provident Partners, Ltd. ("Provident"), and Fairmont Consulting, Inc. ("Fairmont")** are all corporations organized under the laws of Nevis, British West Indies and controlled by Durante. During the relevant period, Durante engaged in manipulative trading and sold stock at artificially inflated prices through brokerage accounts in the names of each of these companies at Union Securities, a Canadian broker-dealer located in British Columbia.

15. **Zimenn Importing and Exporting Inc. ("Zimenn")** is a California corporation based in the Philippines that is controlled by Durante. During the relevant period, Durante engaged in manipulative trading and sold stock at artificially inflated prices through brokerage accounts in the names of both these companies at Union Securities.

16. **Trevor Koenig ("Koenig"), 38, resides in British Columbia, Canada.** Koenig is a broker employed by Union Securities. Koenig was Durante's broker during the course of the RAMO scheme.

17. **Rodoljub Radulovic ("Radulovic"), 52, resides in Lighthouse Point, Florida and was the CEO of RAMO from inception through January 2001.**

18. **Alexander Taflevich ("Taflevich"), 55, resides in Boca Raton, Florida and was RAMO's president from 1996 through January 2001.**

19. **Thomas Hauke** ("Hauke"), 53, is a Certified Public Accountant ("CPA") licensed in the State of New York and a partner in the accounting firm of Van Buren & Hauke.

20. **Moneesh K. Bakshi** ("Bakshi"), 37, a Middletown, New York resident, is corporate lawyer licensed in the State of New York.

THE FRAUDULENT SCHEME

Carib Agreement

21. In or around November 1999, Radulovic and Taflevich began discussions with Durante concerning financing for RAMO. During these discussions, Durante explained that Carib could raise capital for RAMO by manipulating the market for RAMO stock and selling RAMO shares to the public at artificially inflated prices. RAMO and Carib entered into a stock promotion and financing agreement in December 1999.

22. The agreement initially required RAMO to deliver 1.5 million shares to accounts designated by Durante, with an additional 4 million shares to follow. In exchange, Carib promised to raise \$25 million in financing for RAMO. Durante's fee was to be 10% of the amount raised for RAMO, or \$2.5 million. The agreement stated that, once the initial 1.5 million shares were delivered, Carib would "begin utilizing its own market-makers, institutional and retail buyers in the marketplace to buy and hold additional [RAMO] shares in the open market." The agreement also contained a clause that prevented any "insiders" from selling their shares "on increased liquidity and price."

Durante Obtains Control of Float

23. Between December 1999 and February 2000, Radulovic caused 387,264 non-restricted shares of RAMO to be transferred to a Durante-controlled brokerage account at Union

Securities in Canada in the name of Galton. Radulovic transferred 57,000 of these shares from his personal brokerage account and instructed his brother, Zarko Radulovic ("Zarko"), to transfer 330,264 shares from an account in the name of RCI, srl ("RCI"), which Zarko controlled. The restrictive legends were removed from the shares that were held by RCI pursuant to an attorney opinion letter that was issued in December 1999. This opinion letter stated that the stock qualified under the registration exemption set forth in Securities Act Rule 144 because, according to representations made by RCI and Radulovic: (1) the shares had been issued to RCI approximately three years earlier; and (2) neither RCI nor any of its officers were affiliates of RAMO. Contrary to the opinion letter, Zarko had been a vice-president and director of RAMO since at least May 1999.

24. In March 2000, RAMO registered 1,080,000 shares by filing four separate Forms S-8 with the Commission. The Forms S-8 registered 270,000 shares each, which were purportedly issued to four different offshore companies, but each of them was controlled by Durante. The companies were: DOC Consulting, Ltd.; Fairmont Consulting, Ltd.; Provident Partners, Ltd.; and Shropshire Offshore Consulting, Ltd. (the "Offshore Consultants"). The Forms S-8 falsely stated that the shares were being provided to the Offshore Consultants in exchange for unidentified "consulting services" that they had provided to RAMO. RAMO did not have any agreements with the Offshore Entities.

25. The Forms S-8 were drafted and filed with the Commission by Bakshi. Bakshi also issued attorney opinion letters, which were incorporated into the Forms S-8. These opinion letters falsely stated that the shares that were registered pursuant to the Forms S-8 were "duly

authorized for issue and that the Shares, when issued as authorized by the Board of Directors of the Company, will be duly authorized and validly issued, fully paid and non-assessable.”

26. In March 2000, Radulovic instructed RAMO’s transfer agent to issue the 1,080,000 Form S-8 shares to a Durante-controlled account at Union Securities in the name of Berkshire. The Forms S-8 and Bakshi’s opinion letters were submitted to the transfer agent in order to have any restrictive legends removed from the shares. Once this transfer was completed, Durante directly controlled 69% of RAMO’s unrestricted shares. All four Forms S-8 were signed by Radulovic and Taflevich. RAMO’s 1999 Form 10-K, which was also signed by Radulovic and Taflevich, and prepared by Bakshi, further described the issuance of the 1,080,000 shares, stating that “[o]n April 4, 2000 [RAMO] issued 1,080,000 shares of common stock registered on Form S-8 to four (4) consulting firms pursuant to consulting agreements between the consulting firms and [RAMO].”

27. RAMO’s 1999 Form 10-K, the Forms S-8, and Bakshi’s opinion letters were materially misleading because: (a) RAMO never had any agreements with the Offshore Consultants; (b) the Offshore Consultants never rendered any bona fide services to RAMO; and (c) it was illegal to register the shares pursuant to Form S-8, which cannot be used to register securities that are being issued in return for, among other things, services that are in connection with the offer or sale of securities in a capital raising transaction.

Manipulative Trading

28: In furtherance of the fraudulent scheme, Durante and his broker, Koenig, placed orders to purchase and sell RAMO stock in a manner designed to create artificial increases in the quotations for RAMO posted by market-makers on the OTC-BB. Among other things, Durante

bought RAMO shares from and sold RAMO shares to certain market-makers at prices that allowed these market-makers to realize a guaranteed profit on their RAMO transactions. In response, the market-makers increased the bid quotations for RAMO stock and purchased RAMO shares at increasingly high levels. These activities raised both the trading volume and the price of RAMO stock.

29. Durante purchased 650,000 RAMO shares and sold 1.8 million RAMO shares in order to support RAMO's stock price and compensate market-makers. These manipulative trades were knowingly or recklessly executed by Koenig through the following nominee accounts that Durante controlled at Union Securities: Berkshire, Dottenhoff, Galton, Commonwealth Associates, Provident, Fairmont, and Zimenn. Koenig was compensated for his role in the scheme through the substantial commissions he earned as the broker for these nominee accounts.

**False and Misleading Press Releases,
Commission Filings, and Internet Promotions**

NASDAQ Small Cap Listing

30. On February 10, 2000, RAMO issued a press release stating that "the company has submitted its application for listing on the NASDAQ Small Cap" Market. The press release further stated that "[t]he company believes that it has met all criteria, including net asset value and market capitalization to become listed on NASDAQ." Radulovic approved this press release.

31. The February 10, 2000 press release was materially misleading because RAMO never had a good faith belief that it had met the criteria for listing on the NASDAQ Small Cap. In

addition, although RAMO delivered a NASDAQ Small Cap listing application to the NASD in January 2000, the application was returned on February 22, 2000 because RAMO had failed to submit the \$10,000 application fee.

32. Even if RAMO did believe it had met the NASDAQ Small Cap listing criteria, RAMO was made aware that its application was inadequate shortly after the press release was publicly disseminated, but never issued an updating or correcting press release. Within a few weeks after the application was returned, the NASD informed RAMO's counsel that the application had not contained necessary information. RAMO's counsel informed Radulovic of this discussion no later than March 2000. No revised application was ever submitted.

The Saadiyat Project

33. On or around February 24, 2000, a promotional firm called Market Surveys International published a profile of RAMO on its Internet web-site. Radulovic reviewed and approved this profile before it was made public. The profile gave a detailed description of several supposed RAMO development projects, including the "Saadiyat Project." The Saadiyat Project was described as a new port facility that was being constructed by the UAE, which was "to become a leading financial and commodities center to bridge the time-zone difference between London and Singapore/Hong Kong." According to the profile, RAMO had been offered an opportunity become a "founder" of the Saadiyat Project. As a "founder" RAMO would be qualified to serve as a contractor for various projects associated with the project. The profile predicted that RAMO would earn revenues of \$1.6 billion and attain operating profits of \$331 million by "supplying concrete to the Saadiyat Project and other significant constructions in the

UAE.” The profile stated that RAMO expected to earn these tremendous revenues and profits by the year 2004.

34. The revenue and profit predictions contained in the Market Surveys International profile were materially misleading because they were completely baseless. Moreover, according to RAMO’s Commission filings, RAMO would have been required to make an investment of \$50 million in order to actually become a “founder” of the Saadiyat Project. RAMO never had sufficient funding, or even the promise or commitment of sufficient funding, to make this \$50 million investment.

SocoFinance Merger

35. On or around March 7, 2000, RAMO announced that it had entered into a letter of intent to purchase 45 percent of an unnamed Swiss Finance Company valued at over \$150 million dollars. The press release, which was approved by Radulovic, stated that “[t]he specific terms of the transaction were not disclosed.” The Swiss Finance Company referred to in the press release was SocoFinance, S.A., a brokerage firm located in Geneva, Switzerland. RAMO’s Form 10-K for the period ending December 31, 1999, which was filed on April 13, 2000, also discussed the purported SocoFinance transaction. The 10-K stated that RAMO “has signed a letter of intent to purchase 45% of a Swiss Company valued at over \$150 million.” The Form 10-K went on to describe the company, which was still not identified by name, as being “established for over two decades” and having “diversified trading operations in foreign exchange, precious metals, and energy.” This filing was signed by Radulovic and Taflevich.

36. RAMO’s public statements concerning the proposed SocoFinance merger were materially misleading because no specific merger terms were ever discussed and virtually no

steps were taken to make this merger occur. The so-called letter of intent, which was signed by Radulovic on January 27, 2000, was a one-paragraph document stating only that RAMO was "willing to merge with SocoFinance, S.A." The letter did not contain any specific terms for the proposed merger and there was no language concerning what percentage of SocoFinance that RAMO intended to purchase or how RAMO intended to finance the merger. The SocoFinance merger ultimately never took place.

The Audit Opinion

37. RAMO filed a Form 10-K with the Commission for the period ending December 31, 1999 on April 13, 2000. This filing was signed by Radulovic and Taflevich. RAMO's 1999 Form 10-K contained an unqualified audit opinion that was purportedly signed by "Charles R. Eisenstein, C.P.A." This audit opinion was materially misleading because it was not prepared by Eisenstein and no audit had been performed.

38. The audit opinion contained in RAMO's 1999 Form 10-K was actually prepared by Hauke, a CPA who had been paid \$50,000 by Durante in March 2000. Hauke never actually audited RAMO's financials. Instead, Hauke prepared a fraudulent audit opinion, substituted Eisenstein's name for his own, and submitted it to Bakshi for incorporation into RAMO's 1999 Form 10-K.

39. Bakshi incorporated the forged audit opinion into RAMO's 1999 Form 10-K and filed it with the Commission on behalf of RAMO. The only auditor Bakshi dealt with in connection with the 1999 Form 10-K was Hauke. Bakshi had never spoken to Eisenstein before and had never even heard Eisenstein's name prior to seeing it on the forged audit opinion. Although the forged audit opinion contained Eisenstein's typewritten name, it did not contain an actual

signature. Bakshi never received a signed audit opinion concerning RAMO's 1999 year-end financials.

Proceeds of the Fraud

40. Between March and June 2000, Durante sold 1.8 million shares of RAMO from accounts in the names of Berkshire, Dottenhoff, Galton, Commonwealth, Provident, Fairmont, and Zimenn, for net profits of approximately \$3.3 million. During the same time period, Durante wired approximately \$1.6 million to a company controlled by Radulovic; of those funds, \$1.4 million was then sent to RAMO and its subsidiaries.

41. Out of the \$1.4 million received by RAMO from the scheme, at least \$250,000 was used by Radulovic for personal expenses. Taflevich sold approximately 31,000 RAMO shares in February 2000 at prices ranging between \$13.50 and \$19.125 per share. His proceeds from these sales totaled approximately \$547,000.

CLAIM ONE

[VIOLATIONS OF SECTION 17(a) OF THE SECURITIES ACT BY RAMO, DURANTE, BERKSHIRE, DOTTENHOFF, GALTON, COMMONWEALTH ASSOCIATES, PROVIDENT, FAIRMONT, ZIMENN, KOENIG, AND RADULOVIC – FRAUDULENT MARKET MANIPULATION SCHEME]

42. Paragraphs 1 through 41 are hereby realleged and incorporated by reference.

43. Defendants RAMO, Durante, Berkshire, Dottenhoff, Galton, Commonwealth Associates, Provident, Fairmont, Zimenn, Koenig, and Radulovic, and each of them, directly or indirectly, in the offer or sale of securities, by the use of the means or instruments of transportation or communication in interstate commerce or by use of the mails, knowingly or recklessly, have: (a) employed devices, schemes or artifices to defraud; (b) obtained money or

property by means of untrue statements of material fact and omissions 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 transactions, acts, practices and courses of business which operated or would operate as a fraud upon purchasers of securities.

44. As part of and in furtherance of this violative conduct, Defendants Durante, Berkshire, Dottenhoff, Galton, Commonwealth Associates, Provident, Fairmont, Zimenn, and Koenig knowingly or recklessly executed manipulative trades designed to cause artificial increases in RAMO's stock price. Defendants RAMO and Radulovic knowingly or recklessly entered into an illicit agreement with Durante to manipulate RAMO's stock price and provided Durante with millions of unrestricted RAMO shares for purposes of furthering the scheme.

45. By reason of the foregoing, Defendants RAMO, Durante, Berkshire, Dottenhoff, Galton, Commonwealth Associates, Provident, Fairmont, Zimenn, Koenig, and Radulovic, and each of them, have violated, and unless enjoined will again violate, Section 17(a) of the Securities Act [15 U.S.C. §77q(a)].

CLAIM TWO

[VIOLATIONS OF SECTION 10(b) OF THE EXCHANGE ACT AND RULE 10b-5 THEREUNDER BY RAMO, DURANTE, BERKSHIRE, DOTTENHOFF, GALTON, COMMONWEALTH ASSOCIATES, PROVIDENT, FAIRMONT, ZIMENN, KOENIG, AND RADULOVIC – FRAUDULENT MARKET MANIPULATION SCHEME]

46. Paragraphs 1 through 45 are hereby realleged and incorporated by reference.

47. Defendants RAMO, Durante, Berkshire, Dottenhoff, Galton, Commonwealth Associates, Provident, Fairmont, Zimenn, Koenig, and Radulovic, and each of them, directly and

indirectly, by the use of the means and instrumentalities of interstate commerce, or of the mails, or of the facilities of a national securities exchange in connection with the purchase and sale of securities, knowingly or recklessly, have: (a) employed devices, schemes or artifices to defraud; (b) made untrue statements of material facts or omissions 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 any person.

48. As part of and in furtherance of this violative conduct, Defendants Durante, Berkshire, Dottenhoff, Galton, Commonwealth Associates, Provident, Fairmont, Zimenn, and Koenig knowingly or recklessly executed manipulative trades designed to cause artificial increases in RAMO's stock price. Defendants RAMO and Radulovic knowingly or recklessly entered into an illicit agreement with Durante to manipulate RAMO's stock price and provided Durante with millions of unrestricted RAMO shares for purposes of furthering the scheme.

49. By reason of the foregoing, Defendants RAMO, Durante, Berkshire, Dottenhoff, Galton, Commonwealth Associates, Provident, Fairmont, Zimenn, Koenig, and Radulovic, and each of them, have violated, and unless enjoined will again violate, Section 10(b) of the Exchange Act [15 U.S.C. §78j(b)] and Commission Rule 10b-5 [17 C.F.R. §240.10b-5].

CLAIM THREE

**[VIOLATIONS OF SECTION 17(a) OF THE SECURITIES ACT
BY RAMO, RADULOVIC, TAFLEVICH, AND BAKSHI --
MATERIAL MISREPRESENTATIONS AND OMISSIONS]**

50. Paragraphs 1 through 49 are hereby realleged and incorporated by reference.

51. Defendants RAMO, Radulovic, Taflevich, and Bakshi, and each of them, directly or indirectly, in the offer or sale of securities, by the use of the means or instruments of transportation or communication in interstate commerce or by use of the mails, knowingly or recklessly, have: (a) employed devices, schemes or artifices to defraud; (b) obtained money or property by means of untrue statements of material fact and omissions to state materials 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 transactions, acts, practices and courses of business which operated or would operate as a fraud upon purchasers of securities.

52. As part of and in furtherance of this violative conduct, Defendants RAMO, Radulovic, Taflevich, and Bakshi, and each of them, recklessly or knowingly made materially misleading statements to the public concerning, among other things, certain consulting agreements purportedly entered into by RAMO. These statements were contained in RAMO's March 2000 Forms S-8, which were signed by Radulovic and Taflevich and drafted and filed with the Commission by Bakshi.

53. By reason of the foregoing, Defendants RAMO, Radulovic, Taflevich, Hauke, and Bakshi, and each of them, have violated and, unless enjoined will again violate, Section 17(a) of the Securities Act [15 U.S.C. §77q(a)].

CLAIM FOUR

**[VIOLATIONS OF SECTION ~~10b-5~~ OF THE EXCHANGE ACT
AND RULE 10b-5 THEREUNDER BY RAMO, RADULOVIC,
TAFLEVICH, HAUKE, AND BAKSHI -- MATERIAL
MISREPRESENTATIONS AND OMISSIONS]**

54. Paragraphs 1 through 53 are hereby realleged and incorporated by reference.

55. Defendants RAMO, Radulovic, Taflevich, Hauke, and Bakshi, and each of them, directly and indirectly, by the use of the means and instrumentalities of interstate commerce, or of the mails, or of the facilities of a national securities exchange in connection with the purchase and sale of securities, knowingly or recklessly, have: (a) employed devices, schemes or artifices to defraud; (b) made untrue statements of material facts or omissions 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 any person.

56. As part of and in furtherance of this violative conduct, Defendants RAMO, Radulovic, Taflevich, Hauke, and Bakshi, and each of them, recklessly or knowingly made materially misleading statements to the public concerning RAMO and its securities through press releases, Internet profiles, and/or Commission filings. Defendant Radulovic drafted and approved press releases, Internet profiles, and Commission filings which contained material misrepresentations and omitted material facts concerning: RAMO's purported attempts to be listed on the NASDAQ Small Cap; consulting agreements purportedly entered into by RAMO; profit and revenue predictions concerning RAMO's purported construction projects in the UAE; and a forged audit opinion concerning RAMO's 1999 year-end financial statements. Defendant

Hauke prepared the fraudulent audit opinion and Defendant Bakshi prepared RAMO's fraudulent Commission filings.

57. By reason of the foregoing, Defendants RAMO, Radulovic, Taflevich, Hauke, and Bakshi, and each of them, have violated and, unless enjoined will again violate, Section 10(b) of the Exchange Act [15 U.S.C. §78j(b)] and Commission Rule 10b-5 [17 C.F.R. §240.10b-5].

CLAIM FIVE

**[VIOLATIONS OF SECTIONS 5(a) AND 5(c) OF
THE SECURITIES ACT BY RAMO, DURANTE,
BERKSHIRE, GALTON, RADULOVIC, TAFLEVICH,
AND BAKSHI -- OFFER AND SALE OF UNREGISTERED SECURITIES]**

58. Paragraphs 1 through 57 are hereby realleged and incorporated by reference.

59. Defendants RAMO, Durante, Berkshire, Galton, Radulovic, Taflevich, and Bakshi, and each of them, directly or indirectly, have made use of the means or instruments of transportation or communication in interstate commerce or of the mails to offer and sell securities through the use or medium of prospectus or otherwise when no registration statement had been filed or was in effect as to such securities and when no exemption from registration was available.

60. As part of and in furtherance of this violative conduct, Radulovic and Taflevich caused over 1 million unregistered shares, for which no registration exemption was available, to be issued by RAMO and delivered to Durante. Bakshi issued a fraudulent attorney opinion letter in connection with the shares that were purportedly registered by RAMO pursuant to the March 2000 Forms S-8. Durante then sold these unregistered shares through Berkshire and Galton.

61. By reason of the foregoing, Defendants RAMO, Durante, Berkshire, Galton, Radulovic, Taflevich, and Bakshi, and each of them, have violated and, unless enjoined will again violate Sections 5(a) and 5(c) of the Securities Act [15 U.S.C. §§ 77e(a) and 77e(c)].

CLAIM SIX

**[VIOLATIONS OF SECTION 15(d) OF THE EXCHANGE ACT
AND RULES 15d-1 AND 15d-13 THEREUNDER BY RAMO --
FAILURE TO MEET REPORTING OBLIGATIONS]**

62. Paragraphs 1 through 61 are hereby realleged and incorporated by reference.

63. RAMO failed to file with the Commission, in accordance with the rules and regulations prescribed by the Commission, such supplementary and periodic information, documents, and reports as the Commission has prescribed.

64. As part of and in furtherance of this violative conduct, RAMO filed a Form 10-K for its fiscal year ending December 31, 1999, which contained materially misleading financial statements that falsely purported to have been audited by a CPA. RAMO failed to file an annual report for its fiscal year ending December 31, 2001 and quarterly reports for its first and second quarters of 2001.

65. By reason of the foregoing, Defendant RAMO has violated, and unless enjoined will again violate, Section 15(d) of the Securities Act [15 U.S.C. § 78o(d)] and Rules 15d-1 and 15d-13 thereunder [17 C.F.R. §§ 240.15d-1, 240.15d-13].

CLAIM SEVEN

**[LIABILITY OF RADULOVIC AND TAFLEVICH
FOR VIOLATIONS OF SECTIONS 15(d) OF THE EXCHANGE ACT
AND RULE 15d-1 THEREUNDER AS CONTROL PERSONS
UNDER SECTION 20(a) OF THE EXCHANGE ACT]**

66. Paragraphs 1 through 65 are hereby realleged and incorporated by reference.

67. At all times relevant hereto, Radulovic and Taflevich were controlling persons of RAMO for the purposes of Section 20(a) of the Exchange Act [15 U.S.C. §78t(a)].

68. As alleged in paragraphs 62 through 65, RAMO engaged in violations of Sections 15(d) of the Exchange Act [15 U.S.C. § 78o(d)] and Commission Rule 15d-1 [17 C.F.R. §240.15d-1] by filing a Form 10-K containing materially misleading financial statements with the Commission. Radulovic and Taflevich signed this Form 10-K and caused it to be filed with the Commission.

69. By reason of the foregoing, Radulovic and Taflevich are liable as controlling persons pursuant to Section 20(a) of the Exchange Act [15 U.S.C. § 78t(a)] for RAMO's violations, as alleged in paragraphs 62 through 65 above, of Sections 15(d) of the Exchange Act [15 U.S.C. § 78o(d)] and Commission Rule 15d-1 [17 C.F.R. §240.15d-1]; and unless he is enjoined, Radulovic and Taflevich will again engage, as controlling persons, in conduct that would render them liable, pursuant to Section 20(a) of the Exchange Act [15 U.S.C. § 78t(a)] for violations of Sections 15(d) of the Exchange Act [15 U.S.C. § 78o(d)] and Commission Rule 15d-1 [17 C.F.R. §240.15d-1].

CLAIM EIGHT

**[LIABILITY OF HAUKE AND BAKSHI FOR VIOLATIONS
OF SECTIONS 15(d) OF THE EXCHANGE ACT
AND RULE 15d-1 THEREUNDER AS AIDER AND
ABETTORS UNDER SECTION 20(e) OF THE EXCHANGE ACT]**

70. Paragraphs 1 through 69 are hereby realleged and incorporated by reference.

71. Defendants Hauke and Bakshi knowingly or recklessly substantially assisted RAMO's violations of Sections 15(d) of the Exchange Act [15 U.S.C. § 78o(d)] and Commission Rule 15d-1 [17 C.F.R. § 240.15d-1].

72. As alleged in paragraphs 62 through 65, RAMO engaged in violations of Sections 15(d) of the Exchange Act [15 U.S.C. § 78o(d)] and Commission Rule 15d-1 [17 C.F.R. §240.15d-1] by filing a Form 10-K containing a materially misleading audit opinion with the Commission. Hauke knowingly or recklessly prepared this fraudulent audit opinion and submitted it to Bakshi to be incorporated into the Form 10-K. Bakshi then knowingly or recklessly included the fraudulent audit opinion in the Form 10-K and filed it with the Commission.

73. By reason of the foregoing, Hauke and Bakshi are liable as aiders and abettors pursuant to Section 20(e) of the Exchange Act [15 U.S.C. § 78t(e)] for RAMO's violations, as alleged in paragraphs 62 through 65 above, of Sections 15(d) of the Exchange Act [15 U.S.C. § 78o(d)] and Commission Rule 15d-1 [17 C.F.R. §240.15d-1]; and unless he is enjoined, Hauke and Bakshi will again engage, aider and abettors, in conduct that would render them liable, pursuant to Section 20(e) of the Exchange Act [15 U.S.C. § 78t(e)] for violations of Sections 15(d) of the Exchange Act [15 U.S.C. § 78o(d)] and Commission Rule 15d-1 [17 C.F.R.

§240.15d-1].

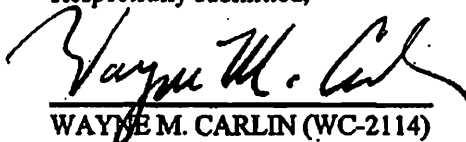
PRAYER FOR RELIEF

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

- a. against Defendants RAMO, Durante, Berkshire, Dottenhoff, Galton, Commonwealth Associates, Provident, Fairmont, Zimenn, Koenig, Radulovic, Taflevich, Hauke, and Bakshi:
 - (i) permanently enjoining each of them, and their officers, agents, servants, employees, attorneys, and those persons in active concert or participation with them, with the exception of Hauke, from violating, directly or indirectly, Section 17(a) of the Securities Act, Section 10(b) of the Exchange Act, and Rule 10b-5 thereunder and permanently enjoining Hauke and his officers, agents, servants, employees, attorneys, and those persons in active concert or participation with him from violating, directly or indirectly, Section 10(b) of the Exchange Act and Rule 10b-5 thereunder;
 - (ii) permanently enjoining Defendants RAMO, Durante, Berkshire, Galton, Radulovic, Taflevich, and Bakshi, and their officers, agents, servants, employees, attorneys, and those persons in active concert or participation with them from violating, directly or indirectly, Sections 5(a) and 5(c) of the Securities Act;

- (iii) permanently enjoining RAMO, and its officers, agents, servants, employees, attorneys, and those persons in active concert or participation with it from violating, directly or indirectly, Section 15(d) of the Exchange Act and Rules 15d-1 and 15d-13 thereunder and permanently enjoining Radulovic, Taflevich, Hauke, and Bakshi, and their officers, agents, servants, employees, attorneys, and those persons in active concert or participation with them from violating, directly or indirectly, Section 15(d) of the Exchange Act and Rule 15d-1 thereunder;
 - (iv) barring Defendants Radulovic and Taflevich from acting as officers or directors of any issuer required to file reports under Sections 12(b), 12(g) or 15(d) of the Exchange Act, pursuant to Section 20(e) of the Securities Act and Section 21(d)(2) of the Exchange Act; and
 - (v) ordering each of them to disgorge unjust enrichment, and prejudgment interest thereon, and each of them, with the exception of RAMO, to pay civil money penalties pursuant to Section 20(d) of the Securities Act and Section 21(d)(2) of the Exchange Act;
- b. Granting such other relief as this Court may deem just and proper.

Respectfully submitted,



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Dated: October 10, 2001.
New York, NY