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11
12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 SECURITIES AND EXCHANGE
COMMISSION,

15 Plaintiff,

16 vs.

17 DANIEL KAISER and STEPHEN H.
18 ROEBUCK,

19 Defendants.

Case No.

**COMPLAINT FOR VIOLATIONS
OF THE FEDERAL SECURITIES
LAWS**

20
21 Plaintiff Securities and Exchange Commission ("Commission") alleges as
22 follows:

23 **JURISDICTION AND VENUE**

24 1. This Court has jurisdiction over this action pursuant to Sections 20(b),
25 20(d)(1), 20(e), 20(g) and 22(a) of the Securities Act of 1933 ("Securities Act"), 15
26 U.S.C. §§ 77t(b), 77t(d)(1), 77t(e), 77t(g) & 77v(a), and Sections 21(d)(1),

1 21(d)(2), 21(d)(3)(A), 21(d)(6)(A), 21(e), and 27 of the Securities Exchange Act of
2 1934 (“Exchange Act”), 15 U.S.C. §§ 78u(d)(1), 78u(d)(2), 78u(d)(3)(A),
3 78u(d)(6)(A), 78u(e), & 78aa. Defendants have, directly or indirectly, made use of
4 the means or instrumentalities of interstate commerce, of the mails, or of the
5 facilities of a national securities exchange, in connection with the transactions,
6 acts, practices and courses of business alleged in this Complaint.

7 2. Venue is proper in this district pursuant to Section 22(a) of the
8 Securities Act, 15 U.S.C. § 77v(a), and Section 27 of the Exchange Act, 15 U.S.C.
9 § 78aa, because certain of the transactions, acts, practices, and courses of business
10 constituting violations of the federal securities laws occurred within this district,
11 and the defendants reside in this district.

12 SUMMARY

13 3. This action involves a fraudulent “pump and dump” scheme to
14 manipulate the stock price of VMT Scientific, Inc., orchestrated by defendants
15 Daniel Kaiser and Stephen H. Roebuck. The Defendants perpetrated their scheme
16 in the second half of 2005 in several carefully planned steps. First, the Defendants
17 merged VMT, a defunct Nevada shell corporation under court-supervised
18 custodianship that had no operations or revenues, with Vacuum Medical
19 Technologies, LLC, a private company owned and controlled by Kaiser that also
20 had no operations or revenues and whose only asset was the licensing rights to a
21 “tissue-enlargement” patent that had never been successfully marketed. Following
22 the “merger” of these two worthless companies, the Defendants caused over 60
23 million shares of VMT to be issued and deposited into accounts controlled by
24 Roebuck. Thereafter, the Defendants issued false and misleading press releases
25 and website proclamations touting VMT as the “opportunity of a lifetime” and a
26 company “poised for financial success” based on its newly-minted “breakthrough”

1 technology, the “VasCir(TM) System,” which the Defendants claimed, without any
2 credible medical or scientific support, stimulates blood flow, expands vascular
3 tissue, promotes vascular tissue growth, and can prevent the need for over 100,000
4 diabetes-related amputations annually. As a result of the Defendants’ fraudulent
5 activities, the trading volume and share price of VMT’s stock skyrocketed. With
6 the market for VMT stock artificially pumped up, Roebuck dumped over nine
7 million shares of VMT by selling his shares into the market, generating a total
8 profit of over \$990,000, a substantial portion of which he shared with Kaiser.

9 4. By engaging in the conduct described in this Complaint, the
10 Defendants, and each of them, have violated, and unless enjoined will continue to
11 violate, the antifraud provisions of Section 17(a) of the Securities Act, 15 U.S.C. §
12 77q(a), and Section 10b-5 of the Exchange Act, 15 U.S.C. § 78j(b), and Rule 10b-5
13 thereunder, 17 C.F.R. § 240.10b-5.

14 5. By engaging in the conduct described in this Complaint, Roebuck
15 violated, and unless enjoined will continue to violate, the securities registration
16 provisions of the Securities Act, Section 5(a) and 5(c) of the Securities Act, 15
17 U.S.C. §§ 77e(a) and 77e(c).

18 6. By this Complaint, the Commission seeks permanent injunctions
19 against each of the Defendants. The Commission also seeks disgorgement with
20 prejudgment interest, civil penalties, and penny stock bar against both Roebuck
21 and Kaiser, as well as an officer and director bar against Kaiser.

22 **THE DEFENDANTS**

23 7. Stephen H. Roebuck (“Roebuck”) resides in Las Vegas, Nevada. From
24 October 2005 to June 2006, Roebuck was a registered representative with CNP
25 Securities, Inc.

26 ///

1 8. Daniel Kaiser ("Kaiser") resides in Henderson, Nevada. Kaiser held
2 the title of Chief Technology Officer at VMT Scientific, Inc.

3 **RELATED ENTITIES**

4 9. VMT Scientific, Inc. (f.k.a. Belair International Telecommunications
5 Corporation, a.k.a. Belair Enterprises, Inc.) (hereinafter "VMT") is a defunct
6 Nevada shell corporation, with its headquarters listed in Las Vegas, Nevada.
7 VMT's shares are not registered with the Commission and are quoted on the OTC
8 Pink Sheets. It has been under a court-supervised custodianship since March 2005,
9 and has no operations or revenues.

10 10. Vacuum Medical Technologies, LLC ("Vacuum Medical"), was a
11 Nevada limited liability company in existence from July 2003 to August 2005 and
12 headquartered in Las Vegas, Nevada. During its short-lived existence it had no
13 operations or revenues.

14 **BACKGROUND**

15 **A. Kaiser's Prior Fraudulent Attempt to Market His "Tissue-**
16 **Enlargement" Patent**

17 11. On August 13, 1997, Kaiser applied for a patent from the United States
18 Patent Office for "an apparatus and method for enlargement of soft tissue, such as
19 breast," which was granted on March 28, 2000. In describing his invention in his
20 patent application, Kaiser claimed that the device consists of a "self-sealing"
21 "containment vessel or vessels also called domes or biospheres," which are
22 designed in varying depths and diameters. In summarizing his invention, Kaiser
23 claimed that when the apparatus is attached to a vacuum source, and worn for a
24 period of days, the device results in the permanent enlargement of the female
25 breast.

26 ///

1 12. Shortly after filing his patent application, Kaiser formed New Womyn,
2 Inc. ("New Womyn") to market his breast-enlargement device, which he called the
3 "Stimulations VII." In promoting the device, New Womyn and Kaiser claimed
4 that the Stimulations VII would permanently grow breast tissue, result in breast
5 enlargement of two to four cup sizes, had been scientifically proven safe and
6 effective for breast enlargement, and would even re-grow breasts that had been
7 removed by mastectomy. New Womyn and Kaiser also claimed that the device
8 had been proven safe and effective.

9 13. Acting on a consumer complaint, on September 21, 1999, the Attorney
10 General for the State of Iowa directed a Civil Investigation Demand ("CID") to
11 New Womyn and Kaiser requesting information about the company and its
12 customers. Kaiser did not comply with the CID and, on January 11, 2000, the
13 Iowa Attorney General filed a petition under the Iowa Consumer Fraud Act,
14 alleging that New Womyn and Kaiser had committed consumer fraud and
15 requesting an injunction prohibiting further marketing of the Stimulations VII.
16 Kaiser never responded to court-ordered discovery and did not appear on the date
17 set for trial. After the Iowa Attorney General presented its evidence to provide a
18 basis for the court's ultimate ruling, the Iowa State district court entered a default
19 judgment against New Womyn and Kaiser, and imposed a permanent injunction
20 barring New Womyn and Kaiser from marketing their "Stimulations VII" breast-
21 enlargement device, a \$40,000 civil penalty for fraud, and a \$311,000 order of
22 restitution in favor of Iowa purchasers. That judgment was affirmed by the Iowa
23 Supreme Court on May 12, 2004. *State of Iowa v. New Womyn, Inc. and Dan*
24 *Kaiser*, No. 39/02-1049 (May 12, 2004). In summarizing the State's evidence, the
25 Iowa Supreme Court observed:

26 While the defendants showed several pictures of women's breasts,

1 claimed by the defendants to have been enlarged by the device, many
2 of the women, including one who allegedly regained breast tissue after
3 a mastectomy, had never even used the device. A Federal Food and
4 Drug Administration employee with extensive experience in the
5 review of applications regarding new medical devices testified that
6 scientists would not accept the defendants' substantiation of their
7 claims. In fact, he testified that a breast pump similar to Stimulations
8 VII was on display in the public lobby of the FDA building in a
9 collection of what the FDA labeled "quack devices."

10 **B. Kaiser Forms Vacuum Medical.**

11 14. In July 2003, while his appeal was still pending before the Iowa
12 Supreme Court, Kaiser formed a new company, Vacuum Medical Technologies,
13 LLC ("Vacuum Medical"), in yet another attempt to exploit his "tissue-
14 enlargement" patent.

15 15. As of mid-2005, Vacuum Medical had no financing, no operations, and
16 no revenues.

17 **ROEBUCK AND KAISER PRIME THE PUMP**

18 **A. Roebuck And Kaiser Enter Into A Backdated "Investment Banking**
19 **Agreement."**

20 16. In approximately June 2005, Kaiser met Roebuck, who offered to assist
21 Kaiser in raising \$2 to \$3 million for Vacuum Medical. Roebuck told Kaiser that
22 his plan was to merge Vacuum Medical into an existing public shell company (*i.e.*,
23 VMT), take control of the unrestricted shares of the company, pump up the stock
24 price, and then sell the shares to generate \$2 to \$3 million in profits. Kaiser agreed
25 to Roebuck's plan.

26 17. As part of the Defendants' plan, in July 2005, Vacuum Medical entered
into an Investment Banking Agreement (the "IB Agreement") with Roebuck.
Although Kaiser signed the IB Agreement in July 2005, Roebuck intentionally

1 backdated the agreement to July 2004 in an attempt to avoid the securities
2 registration requirements under the federal securities laws.

3 **B. VMT Agrees to Acquire Vacuum Technologies.**

4 18. Shortly thereafter, also in July 2005, Vacuum Medical and VMT
5 entered into an Acquisition Agreement. In exchange for acquiring Vacuum
6 Medical, VMT agreed to “pay and deliver to the Shareholders of [Vacuum
7 Medical] or their nominees or assigns, 120,000,000 new restricted common voting
8 shares of [the Company]” (underline in original). Of these 120 million restricted
9 shares, Kaiser and Roebuck were each issued 60 million shares.

10 19. Thereafter, on August 15, 2005, VMT performed a reverse split of 1
11 share for every 75 old shares. VMT also increased its authorized outstanding
12 shares to 500 million.

13 20. All of these transactions were performed while VMT was under court-
14 supervised custodianship and without the required court approval.

15 **C. Roebuck Fraudulently Creates 60 Million Non-Restricted Shares In**
16 **VMT In An Unregistered Transaction Based On A Bogus Promissory**
17 **Note.**

18 21. Roebuck and Kaiser created a \$100,000 convertible promissory note in
19 July 2005 and intentionally backdated it to July 26, 2003, again in an attempt to
20 avoid the securities registration requirements under the federal securities laws.
21 The promissory note was from Vacuum Medical to Kaiser, purportedly to
22 compensate Kaiser for his time and effort in starting Vacuum Medical. As drafted,
23 the promissory note was convertible into shares of common stock of Vacuum
24 Medical at a conversion rate of \$0.001.

25 22. Pursuant to the IB Agreement, on July 15, 2005, Roebuck caused
26 Kaiser to assign to an investor group controlled by Roebuck the \$100,000

1 convertible promissory note, purportedly in exchange for certain financing
2 expenses to be incurred by the investor group.

3 23. On or about August 11, 2005, Roebuck, acting through the investor
4 group which he controlled, then converted a portion of the \$100,000 convertible
5 promissory note into 60 million shares of VMT stock. Those shares were issued
6 on a non-restricted basis pursuant to attorney opinion letters dated August 19,
7 2005, stating the shares were exempt from registration under Section 3(a)(9) of the
8 Securities Act, 15 U.S.C. § 77c(a)(9), based on VMT's transfer of the \$100,000
9 convertible promissory note to the investor group. In providing those opinion
10 letters, the attorney was never advised that the underlying promissory note
11 supporting the attorney's opinion was bogus and had been backdated for the
12 purpose of avoiding securities registration requirements under the federal securities
13 laws. These 60 million unrestricted shares were eventually deposited by Roebuck
14 into brokerage accounts in Turks and Caicos, the Cayman Islands, and Panama.

15 24. No registration statement was in effect as to these 60 million shares.

16 25. As a result of the reverse split and the unregistered distribution of non-
17 restricted stock, Roebuck, through his nominee accounts, controlled approximately
18 99% of the non-restricted shares of VMT.

19 **D. The Court's Failure to Approve VMT's Transactions.**

20 26. On September 21, 2005, after all of the aforementioned transactions
21 had been completed, VMT filed a petition seeking court approval to implement its
22 reverse stock split, and its amendment of its Articles of Incorporation to increase
23 the number of authorized shares so that newly issued shares could be used to
24 facilitate a merger or business combination. The petition also sought to discharge
25 the custodianship. That petition was never granted. As a result, none of
26 aforementioned corporate actions were authorized.

1 **ROEBUCK AND KAISER BEGIN TO PUMP UP VMT'S STOCK PRICE**

2 27. As of mid-October 2005, even though VMT was still under
3 custodianship and the court had not approved the petition or authorized any of the
4 aforementioned corporate actions, Roebuck and Kaiser commenced their
5 “campaign” to promote VMT and to sell Roebuck’s non-restricted stock.

6 **A. VMT’s Website And Its Newly-Minted “VasCir™” System.**

7 28. In anticipation of the promotional “campaign,” in July or August 2005,
8 Roebuck hired a stock promoter to help drive up VMT’s stock price. The promoter
9 hired at least three other stock promoters, who in turn hired at least two more
10 promoters, to help pump the stock. All of those promoters went into action in
11 November, 2005, when they heavily promoted VMT’s stock via the Internet and
12 other means of interstate communication.

13 29. As a further part of the “campaign,” in August 2005, Roebuck
14 instructed Kaiser to create a website for VMT to promote its newly-minted
15 “VasCir™ System.” Kaiser then created the website, which launched on or about
16 November 1, 2005. Prior to its launch, Roebuck reviewed and approved the
17 content of the VMT’s website.

18 30. On VMT’s website, the Defendants claimed that the underlying
19 patented technology of the VasCir™ System has “medical efficacy for the
20 stimulation and enhancement of Circulatory and Neurological Symptoms,” and
21 that its “revolutionary technology ... has already driven the need to file 10+
22 additional patent applications ... with many more to come, as technology and data
23 are collected during the upcoming FDA approved clinical trials.”

24 31. Reminiscent of Kaiser’s fraudulent claims for his Stimulations VII
25 breast enlarger, VMT’s website claimed that the inventor and founder of VMT (*i.e.*,
26 Kaiser) had filed for patent protection on a “safe non-invasive method of assisting

1 tissue reconstruction and tissue histogenesis [*i.e.*, tissue growth] to battle disease or
2 trauma impacting the peripheral vascular system, neurological and glandular
3 tissues, muscle tissue and the skin.” Among it various benefits, VMT’s website
4 claimed that the VasCir™ System :

5 can prevent the need for 100,000 invasive surgical procedures that
6 result in extremity amputation world wide each year;

7 results in the regeneration of neurological tissues;

8 raises blood flow and oxygen levels 300%;

9 enhances the immune system;

10 will be marketed to those suffering from diabetes, and will be used
11 to treat diabetic neuropathy and related diabetic ailments;

12 is rapidly gaining medical acceptance in several medical
13 applications -- including dentistry, limb lengthening, plastic
14 reconstructive surgery and wound healing -- based on its
15 demonstrated medical efficacy;

16 will be covered by insurance re-imbursement from Medicare based
17 on economic savings and quality of life improvements for potential
18 users.

19
20 32. Defendants also touted VMT as a viable entity and compared its growth
21 potential to that of Microsoft and Apple. As VMT’s website proclaimed to would-
22 be investors:

23 **Opportunity of a Lifetime**

24 How many times have we heard that if we had only bought
25 Microsoft™ stock when it was a dollar . . . or a little company
26 called Apple™ when it first hit the market?

1 Well, here's a chance to be on the winning side of those rhetorical
2 (sic) "what if" stories. And, more importantly, help save millions
3 of lives.

4 VMT Scientific, Inc. is a publicly traded corporation trading under
5 the Pink Sheets market and quoted electronically under the trading
6 symbol "VMTF".

7 33. As the Defendants knew, or were reckless in not knowing, VMT's
8 website was false and misleading because it failed to disclose that:

9 (a) VMT was a shell company under court-supervised custodianship;

10 (b) the court had not approved VMT's merger with Vacuum Medical
11 or any its stock changes or issuances;

12 (c) VMT had no operations or revenue;

13 (d) VMT's only source of "funding" was the proceeds derived from
14 Roebuck's sale of VMT stock as part of Defendants' fraudulent "pump and dump"
15 scheme;

16 (e) there was no credible medical or scientific support for the claimed
17 benefits of the VasCir™ System;

18 (f) there was no credible basis for the claim that the VasCir™ System
19 is rapidly gaining medical acceptance in various medical applications based on its
20 demonstrated medical efficacy; and

21 (g) Kaiser's previous attempt to exploit the "revolutionary
22 technology" behind his "tissue-enlargement" patent had been permanently
23 enjoined by the State of Iowa as a fraud upon consumers.

24 **B. Kaiser's Last-Minute Trademark Application.**

25 34. In a further effort to lend an appearance of legitimacy to the VasCir™
26 System, on November 2, 2005, Kaiser filed a trademark application with the
United States Patent and Trademark Office for the "VasCir" word mark. In that

1 application, Kaiser claimed that the VasCir™ System was a “medical device for
2 stimulating blood flow, expanding vascular tissue and promoting vascular tissue
3 growth.” He further claimed that the first use of the VasCir word mark occurred in
4 on June 15, 2005 (in other words, at approximately the same time Kaiser and
5 Roebuck hatched their scheme), and that the first use in commerce of the VasCir
6 word mark occurred on October 24, 2005, which was approximately the same time
7 the Defendants launched VMT’s website, and which was just days before the
8 Defendants commenced the final phase of their fraudulent promotional campaign.

9 **C. Defendants’ False and Misleading Press Releases.**

10 35. In an effort to pump up VMT’s trading volume and share price,
11 between November 2, 2005, and December 9, 2005, VMT issued 13 press releases
12 at Roebuck’s direction. Each of those press releases was drafted by Kaiser and
13 reviewed and approved by Roebuck. The press releases generally discussed VMT,
14 its patented “tissue-enlargement” technology, the development stage of its
15 products, and its plans to secure FDA approval for its products. Collectively, the
16 press releases conveyed that VMT was a viable entity, had obtained initial
17 financing, and that it was well on its way to actual operations and future financial
18 success based in its “breakthrough” technology, the VasCir™ System, “that may
19 make the need for Peripheral Vascular Disease (PVD) and Diabetic associated
20 amputations obsolete.”

21 36. On November 2, 2005, the Defendants issued a press release in VMT’s
22 name, in which they claimed, among other things, that VMT had patented a
23 “unique design of sophisticated negative pressure technology that leads to the first
24 controlled and repeatable method of soft tissue histogenesis [*i.e.*, tissue growth].”

25 37. On November 3, 2005, the Defendants issued another press release in
26 VMT’s name, in which they announced, among other things, that two top medical

1 researchers were able to conclude proper due diligence and evaluate the potential
2 of the VasCir™ device” and that VMT was on track to begin clinical trials.

3 38. On November 8, 2005, the Defendants issued another press release in
4 VMT’s name, in which they claimed, among other things, that VMT was “firmly
5 on track to begin Clinical Trials soon.”

6 39. On November 28, 2005, the Defendants issued another press release in
7 VMT’s name stating that VMT “is poised for a healthy financial future.” In that
8 same press release, VMT breathlessly announced that, “it had begun development
9 of its hand, finger and limb units, as well as the feet” and that “[a]fter fielding calls
10 from desperate individuals facing amputations, their Doctors, requesting to be part
11 of the trials as to help speed the testing and Medical Centers worldwide. VMT
12 Scientific, Inc. has moved its scheduled monolithic development into unilateral
13 phase, where all products will be developed along the same lines.” The press
14 release went on to claim that “the VasCir™ System is predicted to reduce the
15 number of PVD related amputations by 50% or more” and that “The Worlds
16 demand for the VasCir™ System is staggering!” VMT claimed that the “potential
17 market for [its] patented technology is in the millions of units sold annually.” As
18 the press release concluded, “If these projected estimates hold true, everybody
19 wins, the patients, the Doctors, and the Stockholders.”

20 40. On November 30, 2005, the Defendants issued another press release in
21 VMT’s name stating, among other things, that VMT “will form a fully funded
22 official Medical Advisory Board made up of some of the nation’s top medical
23 doctors and researchers in their applied fields.” As VMT explained in that press
24 release, “Bowing to public and professional pressure to accelerate the medical
25 testing of this technology, VMT Scientific feels it prudent to move ahead with this
26 step at this time.”

1 41. On December 7, 2005, the Defendants issued another press release in
2 VMT's name stating, among other things, that VMT "has secured funding that will
3 empower us to remain focused with respect in achieving proper efficacy testing of
4 the VasCir™ device."

5 42. On December 9, 2005, the Defendants issued another press release in
6 VMT's name, in which they claimed, among other things that VMT "has secured
7 funding" that will "enable us to execute and achieve our objectives as defined for
8 Phase II."

9 43. Finally, on December 9, 2007, the Defendants issued another press
10 release in VMT's in which Kaiser was quoted as saying, "Well it has begun. We
11 have been privately contacted by several large medical research centers requesting
12 information and offering possible support for our project. We are also in
13 preliminary stages of negotiations with several major medical services and/or
14 supply companies and have even drawn some powerful international government
15 action. Again, we request that all visit our new web site at <http://www.vmtf.org>."

16 44. On November 27, 2005, in the midst of the Defendants' fraudulent
17 promotional campaign, VMT's website hosting provider suspended VMT's
18 website due to suspected fraud because of massive spam promotions touting the
19 stock and declaring VMT "a clear winner." After being informed of those
20 developments, Kaiser immediately changed hosting providers and reposted VMT's
21 false and misleading website on the Internet in order to keep pump going. On
22 November 29, 2005, Kaiser attempted to cover up the fact that VMT's website had
23 been suspended by issuing yet another press release in which VMT announced that
24 it "is excited to announce due to considerable outpouring of interest from diabetics,
25 as well as doctors, its server has been flooded with emails of interest that have
26 been inspiring to say the least."

1 45. As the Defendants knew, or were reckless in not knowing, each of the
2 press releases issued by VMT were materially misleading because they failed to
3 disclose that:

4 (a) VMT was a shell corporation under court-supervised
5 custodianship;

6 (b) the court had not approved VMT's merger with Vacuum Medical
7 or any of its stock changes or issuances;

8 (c) VMT had no operations or revenue;

9 (d) VMT's only source of "funding" was the proceeds of Roebuck's
10 sale of VMT's stock as part of Defendants' "pump and dump" scheme;

11 (e) VMT had no credible medical or scientific support for the claimed
12 benefits of the VasCir™ System;

13 (f) no medical or clinical researcher had conducted or concluded
14 proper due diligence on the VacCir™ System or evaluated the potential safety or
15 medical efficacy of the device;

16 (g) VMT had not conducted any "controlled and repeatable" studies
17 demonstrating that the VasCir™ System causes tissue growth;

18 (h) VMT had not developed not developed any "hand, finger or limb
19 units;"

20 (i) VMT had no credible or objective basis to support its prediction
21 that the VasCir™ System would reduce the number of PVD amputations by 50%;

22 (j) VMT was not "on track" to commence FDA-approved Phase II
23 clinical trials as it had not yet conducted any FDA-approved Phase I studies, or any
24 other credible, scientific studies to determine the safety and efficacy of the device;
25 and

26 (k) Kaiser's previous attempt to exploit the "revolutionary

1 technology” behind his patent had been permanently enjoined by the State of Iowa
2 upon a finding that Kaiser’s “tissue-growth” product was a fraud upon consumers.

3 **D. The Increase in the Trading Volume and Share Price of VMT’s Stock**
4 **Following Defendants’ False and Misleading Promotional Campaign.**

5 46. Following the launch of VMT’s website and during the issuance of
6 VMT’s misleading press releases, the trading volume in VMT shares increased
7 dramatically. Between October 31, 2005, and December 9, 2005, VMT’s stock
8 price reached a high of \$0.45 a share, with average daily trading volume of
9 approximately one million shares. Trading volume reached a high of 8,971,846
10 shares on November 30, 2005. In contrast, between October 19, 2005 and October
11 28, 2005, immediately preceding the Defendants’ fraudulent promotional
12 campaign, VMT’s stock traded on only four days, at prices between \$0.25 and
13 \$0.30, with an average daily trading volume of only 11,212 shares.

14 **ROEBUCK’S STOCK SALES**

15 **A. Roebuck’s Dump during the Pump.**

16 47. Between November 2, 2005 and December 7, 2005, Roebuck sold
17 1,374,350 shares for proceeds of \$493,348 through a Panamanian account, 212,000
18 shares for proceeds of \$74,738 in a Turks and Caicos account, and 713,000 shares
19 for proceeds of \$222,232 in a Cayman Islands account.

20 48. On December 14, 2006, Roebuck transferred approximately \$300,000
21 to VMT. Kaiser used those funds to pay company expenses, including \$81,491 for
22 his salary and expense reimbursements.

23 **B. The Pump and Dump Ends.**

24 49. On December 6, 2005, counsel for VMT’s custodian informed Kaiser
25 that VMT was still under court-supervised custodianship and demanded that the
26 Defendants stop issuing press releases or operating a website in VMT’s name. On

1 or about December 9, 2005, Kaiser informed Roebuck of his contact with the
2 counsel for VMT's custodian, at which time the Defendants stopped issuing further
3 press releases in VMT's name and shut down VMT's website.

4 **C. Roebuck Continues to Dump His Shares.**

5 50. When the pump and dump ended, Roebuck still controlled
6 approximately 54,000,000 purportedly non-restricted shares of VMT. Although he
7 knew VMT was under court-supervised custodianship and that Kaiser had stopped
8 issuing further press releases, Roebuck continued to dump his shares. Between
9 December 14, 2005 and July 20, 2006, Roebuck sold 7,240,000 shares through a
10 Panamanian account, receiving proceeds of \$202,889.

11 **D. VMT's Current Status.**

12 51. VMT currently trades through the OTC Pink Sheets. Neither VMT,
13 nor the Defendants, has ever disclosed that VMT is a shell company under court-
14 supervised custodianship, that it has no operations or revenues, and that it had
15 failed to obtain court approval authorizing its merger with Vacuum Medical and its
16 stock changes and issuances. VMT has failed to provide the public with current
17 and accurate information about the true nature of the company.

18 **FIRST CLAIM FOR RELIEF**

19
20 **FRAUD IN THE OFFER OR SALE OF SECURITIES**
21 **Violations of Section 17(a) of the Securities Act**
22 **(Against Kaiser and Roebuck)**

23 52. The Commission realleges and incorporates by reference paragraphs 1
24 through 51 above.

25 53. Defendants, and each of them, by engaging in the conduct described
26 above, directly or indirectly, in the offer or sale of securities by the use of means or
instruments of transportation or communication in interstate commerce or by use

1 of the mails:

- 2 a. with scienter, employed devices, schemes, or artifices to
- 3 defraud;
- 4 b. obtained money or property by means of untrue statements of a
- 5 material fact or by omitting to state a material fact necessary in
- 6 order to make the statements made, in light of the circumstances
- 7 under which they were made, not misleading; or
- 8 c. engaged in transactions, practices, or courses of business which
- 9 operated or would operate as a fraud or deceit upon the
- 10 purchaser.

11 54. By engaging in the conduct described above, each of the defendants
12 violated, and unless restrained and enjoined will continue to violate, Section 17(a)
13 of the Securities Act, 15 U.S.C. § 77q(a).

14 **SECOND CLAIM FOR RELIEF**

15 **FRAUD IN CONNECTION WITH THE PURCHASE OR SALE OF**
16 **SECURITIES**

17 **Violations of Section 10(b) of the Exchange Act and Rule 10b-5 Thereunder**
18 **(Against Kaiser and Roebuck)**

19 55. The Commission realleges and incorporates by reference paragraphs 1
20 through 51 above.

21 56. Defendants, and each of them, by engaging in the conduct described
22 above, directly or indirectly, in connection with the purchase or sale of a security,
23 by the use of means or instrumentalities of interstate commerce, of the mails, or of
24 the facilities of a national securities exchange, with scienter:

- 25 a. employed devices, schemes, or artifices to defraud;
- 26 b. made untrue statements of a material fact or omitted to state a

1 material fact necessary in order to make the statements made, in
2 light of the circumstances under which they were made, not
3 misleading; or

4 c. engaged in acts, practices or courses of business which operated
5 or would operate as a fraud or deceit upon other persons.

6 57. By engaging in the conduct described above, each of the defendants
7 violated, and unless restrained and enjoined will continue to violate, Section 10(b)
8 of the Exchange Act, 15 U.S.C. § 78j(b), and Rule 10b-5 thereunder, 17 C.F.R. §
9 240.10b-5.

10 **THIRD CLAIM FOR RELIEF**

11 **UNREGISTERED OFFER AND SALE OF SECURITIES**
12 **Violations of Sections 5(a) and 5(c) of the Securities Act**
13 **(Against Roebuck)**

14 58. The Commission realleges and incorporates by reference paragraphs 1
15 through 51 above.

16 59. Defendant Roebuck, by engaging in the conduct described above,
17 directly or indirectly, made use of means or instruments of transportation or
18 communication in interstate commerce or of the mails, to offer to sell or to sell
19 securities, or to carry or cause such securities to be carried through the mails or in
20 interstate commerce for the purpose of sale or for delivery after sale.

21 60. No registration statement has been filed with the Commission or has
22 been in effect with respect to any of the offerings alleged herein.

23 61. By engaging in the conduct described above, defendant Roebuck
24 violated, and unless restrained and enjoined will continue to violate, Sections 5(a)
25 and 5(c) of the Securities Act, 15 U.S.C. §§ 77e(a) and 77(e)(c).

26 ///

PRAYER FOR RELIEF

WHEREFORE, the Commission respectfully requests that the Court:

I.

Issue findings of fact and conclusions of law that the defendants committed the alleged violations.

II.

Issue judgments, in a form consistent with Fed. R. Civ. P. 65(d), permanently enjoining defendant Roebuck and his officers, agents, servants, employees, and attorneys, and those persons in active concert or participation with any of them, who receive actual notice of the final judgment by personal service or otherwise, and each of them, from violating Sections 5(a) and 5(c) of the Securities Act, 15 U.S.C. §§ 77e(a) and 77(e)(c).

III.

Issue judgments, in a form consistent with Fed. R. Civ. P. 65(d), permanently enjoining defendants Kaiser and Roebuck and their officers, agents, servants, employees, and attorneys, and those persons in active concert or participation with any of them, who receive actual notice of the final judgment by personal service or otherwise, and each of them, from violating Section 17(a) of the Securities Act, 15 U.S.C. § 77q(a), and 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.

IV.

Order defendants Kaiser and Roebuck to disgorge all ill-gotten gains from their illegal conduct, including both profits and losses avoided, together with prejudgment interest thereon.

///

///

V.

Order defendants Kaiser and Roebuck to pay civil penalties under 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).

VI.

Issue judgments, in a form consistent with Fed. R. Civ. P. 65(d), permanently barring defendants Roebuck and Kaiser from participation in any offering of penny stock, including engaging in activities with a broker, dealer, or issuer for purposes of issuing, trading, or inducing or attempting to induce the purchase or sale of any penny stock under Section 20(g) of the Securities Act, 15 U.S.C. § 77t(g), and Section 21(d)(6) of the Exchange Act, 15 U.S.C. § 78u(d)(6).

VII.

Enter and order, pursuant to Section 20(e) of the Securities Act, 15 U.S.C. § 77t(e), and Section 21(d)(2) of the Exchange Act, 15 U.S.C. § 78u(d)(2), prohibiting defendant Kaiser from acting as an officer or director of any issuer that has a class of securities registered pursuant to Section 12 of the Exchange Act, 15 U.S.C. § 78l, or that is required to file reports pursuant to Section 15(d) of the Exchange Act, 15 U.S.C. § 78o(d)

VIII.

Retain jurisdiction of this action in accordance with the principles of equity and the Federal Rules of Civil Procedure in order to implement and carry out the terms of all orders and decrees that may be entered, or to entertain any suitable application or motion for additional relief within the jurisdiction of this Court.

///

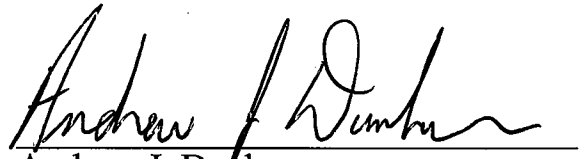
///

///

IX.

Grant such other and further relief as this Court may determine to be just and necessary.

Dated: July 8, 2008


Andrew J. Dunbar
Attorney for Plaintiff
Securities and Exchange Commission

JS 44 (Rev. 12/07)

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**

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

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

Donald W. Searles and Andrew J. Dunbar, Securities and Exchange Commission,
5670 Wilshire Boulevard, 11th Floor, Los Angeles, CA 90036; (323) 965-3998

DEFENDANTS**DANIEL KAISER and STEPHEN H. ROEBUCK**

County of Residence of First Listed Defendant **Clark County**
(IN U.S. PLAINTIFF CASES ONLY)

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

Attorneys (If Known)

Irving M. Einhorn, Law Offices of Irving M. Einhorn, 1710 10th
Street, Manhattan Beach, CA 90266; (310) 798-7216

II. BASIS OF JURISDICTION (Place an "X" in One Box 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)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- (For Diversity Cases Only)
- | | | | | | |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

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

<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 <input type="checkbox"/> 196 Franchise	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	FORFEITURE/PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <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 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 IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark 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	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input checked="" type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <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 <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
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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 (Do not cite jurisdictional statutes unless diversity):
15 U.S.C. § 77q(a); 15 U.S.C. § 78j(b) and 17 C.F.R. § 240.10b-5; 15 U.S.C. §§ 77e(a) & 77e(c) against Roebuck only
Brief description of cause:
The Complaint alleges violations of the federal securities laws.

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

July 8, 2008

SIGNATURE OF ATTORNEY OF RECORD

Andrew J. Dunbar

FOR OFFICE USE ONLY

RECEIPT # _____

AMOUNT _____

APPLYING IFP _____

JUDGE _____

MAG. JUDGE _____

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**Authority For Civil Cover Sheet**

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading 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. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I. (a) Plaintiffs-Defendants. Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.C.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.

Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. Nature of Suit. Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerks in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.

V. Origin. Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

VI. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553
Brief Description: Unauthorized reception of cable service

VII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

VIII. Related Cases. This section of the JS 44 is used to reference related pending cases if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

UNITED STATES DISTRICT COURT

for the

District of Nevada

SECURITIES AND EXCHANGE COMMISSION

Plaintiff

v.

DANIEL KAISER and STEPHEN H. ROEBUCK

Defendant

)
)
)
)
)

Civil Action No.

Summons in a Civil Action

To: *(Defendant's name and address)*

Daniel Kaiser
2272 Chestnut Bluffs Avenue
Henderson, Nevada 89052

A lawsuit has been filed against you.

Within 20 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, whose name and address are:

Donald W. Searles and/or Andrew J. Dunbar
Securities and Exchange Commission
5670 Wilshire Boulevard, 11th Floor
Los Angeles, California 90036

If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Name of clerk of court

Date: _____

Deputy clerk's signature

(Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States allowed 60 days by Rule 12(a)(3).)

Proof of Service

I declare under penalty of perjury that I served the summons and complaint in this case on _____,
by:

- (1) personally delivering a copy of each to the individual at this place, _____;
_____; or
- (2) leaving a copy of each at the individual's dwelling or usual place of abode with _____
who resides there and is of suitable age and discretion; or
- (3) delivering a copy of each to an agent authorized by appointment or by law to receive it whose name is
_____; or
- (4) returning the summons unexecuted to the court clerk on _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

Date: _____

Server's signature

Printed name and title

Server's address

UNITED STATES DISTRICT COURT

for the

District of Nevada

SECURITIES AND EXCHANGE COMMISSION

Plaintiff

v.

DANIEL KAISER and STEPHEN H. ROEBUCK

Defendant

Civil Action No.

Summons in a Civil Action

To: *(Defendant's name and address)*

Stephen H. Roebuck
3213 Bonassola Avenue
North Las Vegas, Nevada 89031

A lawsuit has been filed against you.

Within 20 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, whose name and address are:

Donald W. Searles and/or Andrew J. Dunbar
Securities and Exchange Commission
5670 Wilshire Boulevard, 11th Floor
Los Angeles, California 90036

If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Name of clerk of court

Date: _____

Deputy clerk's signature

(Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States allowed 60 days by Rule 12(a)(3).)

Proof of Service

I declare under penalty of perjury that I served the summons and complaint in this case on _____,
by:

(1) personally delivering a copy of each to the individual at this place, _____;
_____ ; or

(2) leaving a copy of each at the individual's dwelling or usual place of abode with _____
who resides there and is of suitable age and discretion; or

(3) delivering a copy of each to an agent authorized by appointment or by law to receive it whose name is
_____ ; or

(4) returning the summons unexecuted to the court clerk on _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

Date: _____

Server's signature

Printed name and title

Server's address