

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

SUNSTATE FX INC.,  
ULRICH G. GARBE,  
PEGGY L. PATTERSON, and  
JOHN J. HYLAND

Defendants.

**CIVIL RIGHTS KAMP**

CASE NO.

MAGISTRATE JUDGE  
MITUNAG

**COMPLAINT FOR  
INJUNCTIVE AND  
OTHER RELIEF**

Plaintiff, Securities and Exchange Commission ("Commission") alleges that:

**INTRODUCTION**

1. The Commission brings this action to restrain and enjoin Defendants continuing to violate the federal securities laws in connection with their ongoing, fraudulent, unregistered offer and sale securities in the form of investment contracts. Unless immediately restrained and enjoined, Defendants will continue to defraud the investing public and place investor funds at serious risk of diversion and theft.

**DEFENDANTS**

2. Defendant Sunstate FX Inc. ("Sunstate") is a Florida corporation incorporated in September 1999, with principal offices located at One Royal Palm Place, 1877 S. Federal Highway, Suite 308, Boca Raton, Florida 33432.

3. Defendant Ulrich G. Garbe ("Garbe") is forty-six years old and is the chief investment officer and de-facto president of Sunstate. He resides at 2150 N. Ocean Blvd., #B5,

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Boca Raton, Florida 33431.

4. Defendant Peggy L. Patterson ("Patterson") is fifty-two years old and is the chief operating officer and treasurer of Sunstate. She resides at 2150 N. Ocean Blvd., #B5, Boca Raton, Florida 33431.

5. Defendant John J. Hyand ("Hyland") is forty years old and is the executive vice president of Sunstate. He resides at 6582 Newport Lake Circle, Boca Raton, Florida 33496.

#### **JURISDICTION AND VENUE**

6. This Court has jurisdiction over this action pursuant to Sections 20(b), 20(d) and 22(a) of the Securities Act of 1933 ("Securities Act"), 15 U.S.C. §§ 77t(b), 77t(d) and 77v(a), and Sections 21(d), 21(e), and 27 of the Securities Exchange Act of 1934 ("Exchange Act"). 15 U.S.C. §§ 78u(d), 78u(e) and 78aa.

7. Certain of the acts and transactions constituting violations of the Securities Act and the Exchange Act have occurred within the Southern District of Florida. The principal offices of Defendant Sunstate is located within the Southern District of Florida. Defendants Garbe, Patterson and Hyland reside in the Southern District of Florida. Defendants have engaged in many of the acts and practices complained of herein within the Southern District of Florida.

8. Defendants, directly and indirectly, have made use of the means and instrumentalities of interstate commerce, the means and instruments of transportation and communication in interstate commerce, and the mails, in connection with the acts, practices, and courses of business complained of herein.

## **THE FRAUDULENT SCHEME**

### **Background**

9. Sunstate is a company purportedly in the business of trading foreign currency. In the offering materials sent to potential investors, Sunstate describes itself as “a foreign currency exchange company” that “caters to the sophisticated and informed high net-worth investor.”

10. Sunstate claims to raise capital from investors to trade in the foreign currency markets. If a prospect decides to invest, Sunstate opens a foreign currency trading account for the investor and purportedly uses his funds to trade on the “Interbank currency market.” The company purportedly assigns each investor one of its “Forex-Brokers,” who executes trades for Sunstate’s investors in the currency markets.

### **Sunstate’s Offering**

11. Since at least October 1999, Sunstate has been offering and selling securities to the general public in the form of investment contracts. Sunstate has raised over \$54.6 million from approximately 160 investors nationwide and internationally to trade in the foreign currency markets. Sunstate promises investors returns of between 3% and 25% per month and accepts investors’ funds without regard to the amount of the investment. After investing with Sunstate, investors receive periodic account statements showing the purported status of their investment.

12. Sunstate’s investment contracts are offered and sold to the general public through a network of independent sales agents located throughout the United States and internationally. Sunstate does not require that the sales agents have securities licenses. The sales agents “cold call” investors and solicit funds by emphasizing the profitability, and at times, the safety of Sunstate’s foreign currency trading program. During these solicitations, Sunstate’s sales agents

tout, among other things, the company's purported successful trading history and the investment's purported high rates of returns.

13. The sales agents sometimes visit prospective investors in person to solicit funds and often encourage prospects to call Garbe for more information about the company. After the sales agent introduces Sunstate's investment opportunity to the prospect, the company sends the prospect its offering materials by overnight delivery. Sunstate pays its sales agents commissions on the investor's principal investment.

14. Sunstate also solicits investors through advertisements in newspapers across the nation and through its web page located on the Internet.

15. Sunstate's investment contracts are securities as defined by Section 2(1) of the Securities Act, 15 U.S.C. § 77b(1), and Section 3(a)(10) of the Exchange Act, 15 U.S.C. § 78c(10). No registration statement has been filed or is in effect with the Commission in connection with Sunstate's offering.

#### **Sunstate's Offering Documents**

16. Prospective investors receive offering materials describing the Sunstate investment opportunity. The offering materials being sent to prospects include, among other things, an introductory letter to investors, a one-page document entitled "How to Open Your Account With Us...", a two-page document entitled "Procedures Guide" signed by Hyland and Garbe, a "Foreign Exchange Agreement", a "Rebate and Fee Acknowledgment" form, a "Power of Attorney" form, a two-page "Risk Disclosure Document," a one-page "Customer Account Application," a section entitled "An Introduction to Foreign Exchange," and a 21-page section entitled "Diversified Trading Strategies to Profit in the Global Foreign Exchange Markets."

17. The company's website contains materials that are virtually identical to those being provided to prospective investors. In addition, some investors also received a computer disk containing a multi-media video narrated by Garbe and a slide show that tout the Sunstate investment opportunity and the foreign currency exchange markets.

18. Sunstate represents to investors in its offering materials that once they are accepted into Sunstate's trading program, a segregated account will be established for them in the company's "Customer Segregated Account." The company instructs prospective investors that they can fund their account "by T-Bills, Certified Checks, or Bank wire."

19. Sunstate's introductory letter to prospective and current investors represents that Sunstate will use investor funds to trade in the foreign exchange market. In the letter, investors are told that Sunstate "strive[s] to keep each investor on the cutting edge of the foreign exchange market through [its] direct access of the global markets twenty-four hours a day." The letter also explains that Sunstate "initiate[s] [its] trading by having an office equipped with state of the art computerized technology." In addition, the letter touts the experience of Sunstate's trading team by claiming that the team has "fifty years of combined financial market experience with well established networks in the United States and Europe."

#### **Role of Garbe**

20. Garbe, as de-facto president and chief investment officer of Sunstate, manages the day-to-day affairs of the company. Garbe also introduces himself to prospective investors on the company's multi-media video as the "founder" of Sunstate. In addition, Garbe is responsible for the company's foreign currency trading program.

21. Garbe has signatory authority over most of Sunstate's bank accounts and controls

the movement of monies in those accounts. He also approves the company's payroll and communicates directly with Sunstate's accountant during his preparation of Sunstate's financial statements.

22. Garbe solicits funds from potential investors and communicates with current investors both verbally and in writing. For example, after sending in their money, Garbe sends a letter to investors acknowledging receipt of their funds and thanking them for investing with Sunstate. He also accepts telephone calls from potential and current investors and meets with them in person. On occasion, he has given prospects tours of Sunstate's facilities.

#### **Role of Patterson**

23. Patterson is president, chief operating officer and incorporator of Sunstate. Patterson is the administrative contact for Sunstate's website. She has, along with Garbe, signatory authority over all of Sunstate's bank accounts. She also controls the movement of monies in those accounts. Patterson communicates with Sunstate's accountant during his preparation of the company's financial statements.

24. Patterson communicates with potential and current investors in person and over the telephone. Patterson has represented to investors that she is responsible for the financial records and bank accounts of Sunstate.

#### **Role of Hyland**

25. Hyland is the executive vice president of Sunstate. He is one of Sunstate's currency traders and has trading authority over the company's foreign currency accounts. In addition, Hyland solicits investor funds and communicates with investors both verbally and in writing. For example, in a letter contained in the company's offering materials, Hyland instructs

prospects how to open an account with Sunstate. Hyland also sends letters to investors acknowledging receipt of their funds and thanking them for the investment.

**Material Misrepresentations and Omissions  
in Connection with the Offer and Sale of Sunstate's Investment Contracts**

26. Sunstate's offering materials contain material misrepresentations and omissions concerning, among other things, the use of investor proceeds, commissions paid to Sunstate's sales agents and the safety of the investment.

**Use of Investor Proceeds**

27. Sunstate's offering materials are misleading prospects into believing that their funds will be used for the purpose of trading in the foreign currency markets. Bank records and trade documents show that of the \$54.6 million raised from investors, only approximately \$11 million, or 20%, was actually traded in foreign currency. In addition, of the \$11 million in investor funds invested in the foreign currency exchange markets, approximately \$5.8 million was returned back to Sunstate within a few short months. As a result, Sunstate made materially false and misleading statements and omissions to investors regarding the use of their proceeds.

28. Sunstate also fails to disclose to potential investors that a significant portion of their funds are being used to pay commissions to the company's network of independent sales agents. Although Sunstate discloses to investors in its offering materials that commissions will be charged on each foreign exchange transaction, there is no disclosure regarding the commissions that are paid to the independent sales agents for generating investor capital. More specifically, the company's bank and accounting records reveal that of the \$54.6 million raised

from investors. Sunstate's sales agents received a total of approximately \$10.6 million in commissions -- representing 19.4% of investor funds -- from the offering.

**Misappropriation of Investor Funds**

29. Bank records reveal that significant amounts of investor funds are being misappropriated by the company's principals to purchase, among other things, luxurious houses, automobiles, and other items. In total, records show that at least \$2.9 million in investor monies have been taken by Garbe, Patterson and Hyland for their own personal use.

30. Sunstate has disseminated financial statements that reflect the company as having earned \$16.8 million in gross income as of the year ended December 31, 2000. However, account statements reveal that this "gross income figure" is completely fabricated. An analysis of Sunstate's bank accounts shows that Sunstate's "gross income" actually consists almost entirely of investor funds. In fact, records show that Sunstate generated a net loss of more than \$800,000 for the year 2000 through its foreign currency trading.

**Verbal Statements to Investors Regarding the Safety of Sunstate's Foreign Currency Trading Program**

31. Sunstate's sales representatives, including Garbe, are making blatantly false and misleading verbal statements to prospective investors concerning the safety of investing in the company's foreign currency trading program. Contrary to the representations made in the company's "risk disclosure document," investors are verbally misled into believing that their funds are relatively safe in the company's foreign currency program.

32. Sunstate's sales agents have told investors that the company's foreign currency program is a "safe investment." After being solicited by a Sunstate sales representative, one



investor was left with the impression that it was “easy for Sunstate to make money and that [the] investment opportunity was a sure thing.” In another case, when an investor expressed to Garbe that he was looking for a safe investment, Garbe responded that Sunstate could guarantee him an average return of 3% per month on his investment. Similarly, Garbe told an investor that his principal would be guaranteed.

33. Considering the high risk involved in foreign currency markets, the statements being made to investors regarding the safety of the investment and the promises of guaranteed returns are grossly misleading and are nothing more than deceptive tools to lure investors into feeling comfortable with the safety of the Sunstate investment. Given the volatile and highly speculative nature of foreign currency trading, investments in Forex markets are not considered “safe,” and as such, returns cannot be “guaranteed.”

#### **Evidence of a Ponzi Scheme**

34. Sunstate’s bank records reflect that a nominal amount of investor funds actually goes to foreign currency trading. Existing investors who insist on getting their “profits” in cash are paid out of new investor funds, as what little Forex trading has been done has been far from profitable. Sunstate is thus engaged in a modified Ponzi scheme. Bank records reflect that no more than 20% of investors’ funds are actually used to trade foreign currency. Instead, as indicated, at least \$2.9 million has been misappropriated by the principals for their own personal use. In addition, unbeknownst to investors, Sunstate has paid -- out of investor proceeds -- in excess of \$10.6 million in commissions to its independent sales agents.

**COUNT I**

**SALE OF UNREGISTERED SECURITIES IN VIOLATION OF  
SECTIONS 5(a) AND 5(c) OF THE SECURITIES ACT**

35. The Commission repeats and realleges paragraphs 1 through 34 of this Complaint.

36. No registration statement was filed or in effect with the Commission pursuant to the Securities Act and no exemption from registration exists with respect to the securities and transactions described herein.

37. Since a date unknown but since at least October 1999 through the present, Defendants Sunstate, Garbe and Hyland, directly and indirectly, have been:

(a) making use of the means or instruments of transportation or communication in interstate commerce or of the mails to sell securities as described herein, through the use or medium of a prospectus or otherwise; (b) carrying securities or causing such securities, as described herein, to be carried through the mails or in interstate commerce, by any means or instruments of transportation, for the purpose of sale or delivery after sale; and/or (c) making use of the means or instruments of transportation or communication in interstate commerce or of the mails to offer to sell or offer to buy through the use or medium of any prospectus or otherwise, as described herein, without a registration statement having been filed or being in effect with the Commission as to such securities.

38. By reason of the foregoing, Sunstate, Garbe and Hyland, directly and indirectly, have violated, and unless enjoined, will continue to violate Sections 5(a) and 5(c) of the Securities Act, 15 U.S.C. §§ 77e(a) and 77e(c).

**COUNT II**

**FRAUD IN VIOLATION OF  
SECTION 17(a)(1) OF THE SECURITIES ACT**

39. The Commission repeats and realleges paragraphs 1 through 34 of the Complaint.

40. Since a date unknown but since at least October 1999 through the present, Defendants Sunstate, Garbe and Hyland directly and indirectly, by use of the means or instruments of transportation or communication in interstate commerce and by use of the mails, in the offer or sale of securities, as described herein, have been, knowingly, willfully or recklessly employing devices, schemes or artifices to defraud.

41. By reason of the foregoing, Defendants Sunstate, Garbe and Hyland, directly and indirectly, have violated and, unless enjoined, will continue to violate Section 17(a)(1) of the Securities Act, 15 U.S.C. § 77q(a)(1).

**COUNT III**

**FRAUD IN VIOLATION OF SECTION 10(b)  
OF THE EXCHANGE ACT AND RULE 10b-5 PROMULGATED THEREUNDER**

42. The Commission repeats and realleges paragraphs 1 through 34 of its Complaint.

43. Since a date unknown but since at least October 1999 through the present, Defendants Sunstate, Garbe, Patterson and Hyland, directly and indirectly, by use of the means and instrumentality of interstate commerce, and of the mails, and of any facility of any national securities exchange, in connection with the purchase or sale of the securities, as described herein, have been, knowingly, willfully or recklessly: (a) employing devices, schemes or artifices to defraud; (b) making untrue statements of material facts and omitting 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/or (c) engaging in acts, practices and courses of business which have operated, are now operating and will operate as a fraud upon the purchasers of such securities.

44. By reason of the foregoing, Defendants Sunstate, Garbe, Patterson and Hyland, directly or indirectly, have violated and, unless enjoined, will continue to violate 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.

#### **COUNT IV**

#### **FRAUD IN VIOLATION OF SECTIONS 17(a)(2) AND 17(a)(3) OF THE SECURITIES ACT**

45. The Commission repeats and realleges paragraphs 1 through 34 of its Complaint.

46. Since a date unknown but since at least October 1999 through the present, Defendants Sunstate, Garbe and Hyland, directly and indirectly, by use of the means or instruments of transportation or communication in interstate commerce and by the use of the mails, in the offer or sale of securities, as described herein, have been: (a) obtaining money or property by means of untrue statements of material facts and omissions to state material facts necessary to make the statements made, in the light of the circumstances under which they were made, not misleading; and/or (b) engaging in transactions, practices and courses of business which are now operating and will operate as a fraud or deceit upon purchasers and prospective purchasers of such securities.

47. By reason of the foregoing, Defendants Sunstate, Garbe and Hyland, directly and indirectly, have violated and, unless enjoined, will continue to violate Sections 17(a)(2) and

17(a)(3) of the Securities Act, 15 U.S.C. §§ 77(q)(a)(2) and 77(q)(a)(3).

**RELIEF REQUESTED**

**WHEREFORE**, the Commission respectfully requests that the Court:

**I.**

**Declaratory Relief**

Declare, determine and find that Defendants Sunstate, Garbe, Patterson and Hyland committed the violations of the federal securities laws alleged herein.

**II.**

**Temporary Restraining Order,  
Preliminary and Permanent Injunctive Relief**

Issue a Temporary Restraining Order, a Preliminary Injunction and a Permanent injunction, restraining and enjoining:

(1) Defendants Sunstate, Garbe and Hyland, their officers, agents, servants, employees, attorneys, and all persons in active concert or participation with them, and each of them, from violating: (a) Sections 5(a) and 5(c) of the Securities Act, 15 U.S.C. §§ 77e(a) and 77e(c); (b) Section 17(a)(1) of the Securities Act, 15 U.S.C. § 77q(a); (c) 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; and (d) Sections 17(a)(2) and 17(a)(3) of the Securities Act, 15 U.S.C. §§ 77(q)(a)(2) and 77(q)(a)(3); and

(2) Defendant Patterson, her officers, agents, servants, employees, attorneys, and all persons in active concert or participation with them, and each of them, from 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.

**III.**

**Disgorgement**

Issue an Order requiring Defendants Sunstate, Garbe, Patterson and Hyland to disgorge all ill-gotten profits or proceeds that they have received as a result of the acts and/or courses of conduct complained of herein, with prejudgment interest.

**IV.**

**Penalties**

Issue an Order directing Defendants Sunstate, Garbe, Patterson and Hyland to pay civil money penalties pursuant to Section 20(d) of the Securities Act, 15 U.S.C. § 77t(d), and Section 21(d) of the Exchange Act, 15 U.S.C. § 78(d)(3).

**V.**

**Asset Freeze and Accounting**

Issue an Order temporarily freezing the assets of Defendants Sunstate, Garbe, Patterson and Hyland until further Order of the Court, and requiring accountings by Sunstate, Garbe, Patterson and Hyland.

**VI.**

**Appointment of Receiver**

Issue an Order appointing a Receiver of the assets of Sunstate to marshal and safeguard all of said assets, and any other duties the Court deems appropriate, and to prepare a report to the Court and the Commission detailing the activities of Sunstate, Garbe, Patterson and Hyland and the whereabouts of investor funds.

**VII.**

**Records Preservation and Expedited Discovery**

Issue an Order requiring Defendants Sunstate, Garbe, Patterson and Hyland to preserve any records related to the subject matter of this lawsuit that are in their custody, possession or subject to their control, and to respond to discovery on an expedited basis.

**VIII.**

**Repatriation of Investor Proceeds**

Issue an Order requiring Defendants Sunstate, Garbe, Patterson and Hyland to take such steps as are necessary to repatriate to the territory of the United States all funds and assets of investors described in the Commission's Complaint in this action which are held by them or are under their direct or indirect control, jointly or singly, and deposit such funds into the registry of the United States District Court for the Southern District of Florida, and provide the Commission and the Court a written description of the funds and assets so repatriated.

**IX.**

**Further Relief**

Grant such other and further relief as may be necessary and appropriate.

**X.**

**Retention of Jurisdiction**

Further, the Commission respectfully requests that the Court retain jurisdiction over this action in order to implement and carry out the terms of all orders and decrees that may hereby be

# 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 REVERSE OF THE FORM.)

### I. (a) PLAINTIFFS

**Securities and Exchange Commission**

### DEFENDANTS

**Sunstate FX Inc., Ulrich G. Garbe, Peggy L. Patterson, and John J. Hyland**

CLERK OF DISTRICT COURT  
MAGISTRATE JUDGE  
TUNAC

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF  
(EXCEPT IN U.S. PLAINTIFF CASES)  
Ala Beach 01C 8328/KLR/AEV

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT Palm Beach  
(IN U.S. PLAINTIFF CASES ONLY)

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

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)  
Glenn Harris (305) 982-6341  
Margarete Bronhard (305) 982-6338  
SEC, 1401 Brickell Ave., #200 Miami, FL 33131

ATTORNEYS (IF KNOWN)

(d) CIRCLE COUNTY WHERE ACTION AROSE: DADE, MONROE, BROWARD, PALM BEACH, MARTIN, ST. LUCIE, INDIAN RIVER, OKEECHOBEE HIGHLANDS

### II. BASIS OF JURISDICTION (PLACE AN "X" IN ONE BOX ONLY)

- U.S. Government Plaintiff
- Federal Question (U.S. Government Not a Party)
- U.S. Government Defendant
- Diversity (Indicate Citizenship of Parties in Item III)

### III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN "X" IN ONE BOX FOR PLAINTIFF (For Diversity Cases Only)

- |   |                          |         |                          |   |   |                          |         |                          |   |   |
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| Citizen of This State                   | <input type="checkbox"/> | PTF DEF | <input type="checkbox"/> | 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> | PTF DEF | <input type="checkbox"/> | 4 | 5 |
| 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 | 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 | 6 |

### IV. ORIGIN (PLACE AN "X" IN ONE BOX ONLY)

- Original Proceeding
- Removed from State Court
- Remanded from Appellate Court
- Reinstated or Reopened
- Transferred from another district (specify)
- Multidistrict Litigation
- Appeal from District Court

### V. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)

A CONTRACT	A TORTS	FORFEITURE/PENALTY	A LABOR	A BANKRUPTCY	A PROPERTY RIGHTS	B SOCIAL SECURITY	FEDERAL TAX SUITS	A OTHER STATUTES	
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### 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)

15 U.S.C. §§ 77e(a) and 77e(c); 15 U.S.C. § 77q(a)(1); 17 C.F.R. § 240.10b-5; 15 U.S.C. § 78j(b)  
LENGTH OF TRIAL 15 & S.C. §§ 77q(a)(2) and 77q(a)(3). Violations of the anti-fraud and registration provisions of the federal securities laws.  
va. 5 days estimated (for both sides to try entire case)

VII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23  DEMAND \$ TRO, Prel. & Perm. Inj CHECK YES only if demanded in complaint: Disgorgement, Penalties JURY DEMAND:  YES  NO

VIII. RELATED CASE(S) (See instructions). IF ANY: JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

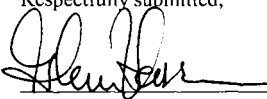
DATE 4-18-01 SIGNATURE OF ATTORNEY OF RECORD Glenn Harris

IX. OFFICE USE ONLY: RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFF \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_



entered, or to entertain any suitable application or motion by the Commission for additional relief within the jurisdiction of this Court.

April 18, 2001

Respectfully submitted,  
  
By: \_\_\_\_\_  
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