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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

SECURITIES AND EXCHANGE COMMISSION, Plaintiff, vs. STEPHEN LUSCKO, GREGORY NEU, JUSTIN MEDLIN, EMERGING HOLDINGS, INC., MASSCLICK, INC., and CHINA SCORE, INC., Defendants, and LYONS CHECKSHOP, INC., MARC PRIMO PULISCI, and TYSON SU, Relief Defendants.	CV 07 2783 DDP (AGRx) Case No.: **COMPLAINT FOR VIOLATIONS OF THE FEDERAL SECURITIES LAWS**

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

JURISDICTION AND VENUE

1. This Court has jurisdiction over this action pursuant to Sections 20(b), 20(d)(1), and 22(a) of the Securities Act of 1933 ("Securities Act"), 15 U.S.C. §§ 77t(b), 77t(d)(1), & 77v(a), and Sections 21(d)(1), 21(d)(3)(A), 21(e), and 27 of the Securities Exchange Act of 1934 ("Exchange Act"), 15 U.S.C. §§ 78u(d)(1), 78u(d)(3)(A), 78u(e), & 78aa. Defendants have, directly or indirectly, made use of the means or instrumentalities of interstate commerce, of the mails, or of the facilities of a national securities exchange, in connection with the transactions, acts, practices, and courses of business alleged in this complaint.

2. Venue is proper in this district 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, because certain of the transactions, acts, practices, and courses of conduct constituting violations of the federal securities laws occurred within this district. Specifically, fraudulent spam e-mails were sent to individuals residing in this district, and individuals residing in this district purchased the defendant companies' securities.

SUMMARY

3. This case involves a fraudulent "pump and dump" market manipulation scheme orchestrated by defendants Stephen Luscko ("Luscko"), Gregory Neu ("Neu"), and Justin Medlin ("Medlin") between March and August 2004. Defendants Luscko, Neu, and Medlin artificially inflated the stock price and volume of certain companies whose stock traded on the over-the-counter market by inundating the public with millions of false and misleading spam e-mails touting those companies.

4. After "pumping" up the stock price and volume through the false and misleading e-mail spam, defendants Neu and Luscko, and the companies they

controlled, "dumped" the stock into the open market by selling their shares at the artificially inflated prices. As a result, Neu and Luscko and their companies netted over $6.5 million in trading profits.

5. Defendants Neu and Luscko manipulated the stock of four companies: eDollars, Inc.; and defendants Emerging Holdings, Inc.; Massclick, Inc.; and China Score, Inc. (collectively, the "Issuers"). With the assistance of Medlin, Neu and Luscko conducted widespread spam e-mail campaigns as part of their manipulative scheme. Neu, Luscko, and Medlin employed a similar pattern in manipulating the stock of each of the Issuers.

6. First, Neu and Luscko formed a company and recruited cohorts to act as company officers or serve on the board of directors ("company nominees"), or Neu and Luscko acted in a similar capacity themselves.

7. Second, Neu and Luscko enlisted different nominees and arranged, or directed their company nominees to arrange, for the company to conduct unregistered stock offerings, and then to transfer the stock sold in these offerings to a different set of nominees ("trading nominees"). These transfers were shams designed to bypass Commission regulations that required that the shares distributed in the unregistered offering be restricted from being resold into the open market. Neu and Luscko directed their trading nominees to initiate trading in that company's stock on the over-the-counter market.

8. Third, Neu and Luscko drafted false press releases about the company and employed Medlin to begin a widespread spam e-mail campaign touting the company and its stock. Neu and Luscko wrote the text for the spam e-mail, which included false statements about the company's operations and short-term and long-term price targets for the company's stock. Medlin edited the e-mail and sent out millions of the spam e-mail over a weekend. The press release and weekend spam e-mail campaign generated investors' interest because these touts immediately and significantly increased the company's stock trading price and volume when trading

for the company's stock resumed on the Monday business day following the weekend spam campaign, and for several days after.

9. Fourth, while the company's stock price and volume were artificially high, Neu and Luscko sold their stock, or directed their trading nominees to sell their stock in the instances where Neu and Luscko did not hold these shares directly.

10. After the Defendants' "pump" phase ceased, the stock price declined rapidly.

11. Neu, Luscko, Emerging Holdings, Massclick, and China Score's conduct violated the securities registration provisions of the federal securities laws. Additionally, Neu, Luscko, and Medlin violated the antifraud provisions of the federal securities law. Medlin also violated the anti-touting provisions of the federal securities laws. By this action, the Commission seeks permanent injunctive relief and disgorgement with prejudgment interest of the defendants' ill-gotten gains. Furthermore, the Commission seeks civil penalties, as well as a penny stock bar, against Neu, Luscko, and Medlin, and conduct-based injunctive relief against Neu and Luscko prohibiting either from conducting unregistered securities offerings.

12. The Commission also seeks disgorgement from various relief defendants who received proceeds from the fraudulent scheme.

THE DEFENDANTS

13. Stephen Luscko, age 39, is a resident of Sarasota, Florida. Luscko was the president of eDollars. Along with Neu, Luscko orchestrated the Issuers' stock to become quoted on the Pink Sheets, an electronic quotation system that displays quotes for many over-the-counter securities. Luscko formerly worked as a licensed securities professional for a stock brokerage firm. In July 2005, the New York Stock Exchange censured Luscko and barred him for five years for making unauthorized trades in 2001 and 2002.

14. Gregory Neu, age 30, is a resident of Miami, Florida. Neu was the CEO of eDollars, and owns Lyons Checkshop, Inc, one of the relief defendants in this action. Neu is Luscko's wife's cousin. Along with Luscko, Neu caused the Issuers' stock to become quoted on the Pink Sheets, and directed defendant Medlin to embark on the weekend spam e-mail campaigns promoting the Issuers' stock.

15. Justin Medlin, age 25, last known residence was San Diego, California. Working with Neu, Medlin disseminated millions of false and misleading spam e-mails to the investing public. In 2003, Medlin entered into a settlement with a well known Internet service provider relating to illicit mass e-mail spamming he conducted through that provider's e-mail service.

16. Emerging Holdings, Inc. is a Nevada corporation formed in July 2004 and is based in Reston, Virginia, out of a townhouse owned by the parents of the company's president. Emerging Holdings purportedly is involved in technology sales in emerging foreign markets. The president of the company, who is also its secretary, treasurer and director, was a childhood acquaintance of Neu. Emerging Holdings is quoted on the Pink Sheets under the symbol EMRH.

17. Massclick, Inc. is a Nevada corporation formed in July 2004 and is based in Hollywood, Florida. Massclick is purportedly an Internet marketing company that brokers the sales of goods and services online. The president of the company, who is also its secretary, treasurer and director, is an associate of Neu. Massclick is quoted on the Pink Sheets under the symbol MSCK.

18. China Score, Inc. is a Nevada corporation formed in July 2004 and is based in Las Vegas, Nevada. China Score was purportedly formed to create a credit scoring system for individuals in China. The president of the company, who is also its secretary, treasurer and director, is a business associate of Neu. China Score is quoted on the Pink Sheets under the symbol CIAS.

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THE RELIEF DEFENDANTS

19. Lyons Checkshop, Inc. is a New Jersey corporation based in Newark and owned and operated by Neu and his father. Several million dollars worth of proceeds from Neu's, Luscko's and their nominees' stock sales were funneled through Lyons Checkshop's bank accounts. Neu and Luscko also used Lyons Checkshop to fund several of their nominee traders' brokerage accounts and subsequent stock purchases.

20. Marc Primo Pulisci is an attorney who resides in Los Angeles, California, and has been licensed to practice law there since 2001. In April 2004, Pulisci established RNTTY Funds, LLC, a Nevada company. Between July 9 and September 17, 2004, Lyons Checkshop wired $540,000 to a bank account controlled by RNTTY. The funds wired to RNTTY were meant to be payment to Medlin for the spam e-mail campaign.

21. Tyson Su, age 31, is a resident of New York, New York. Su is Neu's former college classmate. Between May and August 2004, Su owned and traded shares of eDollars and Emerging Holdings. In July 2004, Su received 9.75 million purportedly unrestricted shares of Massclick in an unregistered transaction. Su subsequently sold 170,300 of these shares. Su wired $300,000 of the proceeds of his sales to a bank account controlled by Massclick.

THE FRAUDULENT SCHEME

22. Defendants Neu, Luscko, and Medlin carried out their scheme manipulating the stock of four companies: eDollars, Emerging Holdings, Massclick and China Score. Their schemes operated as follows:

A. EDOLLARS

23. Neu and Luscko formed eDollars in February 2004. Information contained on its website represented that eDollars was an "online payday loan company." But, contrary to the statements on its website, eDollars did not have any customers, and had never processed any "payday loans" or engaged in any

other kind of business. eDollars had never generated any revenue, nor did it own any proprietary software or any other intellectual property. Trading was initiated in the company's stock on February 23, 2004, when a brokerage firm received a customer's purported unsolicited buy order for 2,000 shares at $.10 per share, at which time the ticker symbol for eDollars was created.

24. Immediately after it incorporated, eDollars, Neu, and Luscko engaged attorney David Stocker ("Stocker") to provide a legal opinion as to the propriety of its proposed sale and issuance of 16 million shares of common stock to two entities.

25. Under Section 5 of the Securities Act of 1933, a company may not conduct an offering of securities without first registering the offering with the Commission unless the company can prove that a valid exemption from registration exists. With few exceptions, securities issued in an exempt transaction are restricted, meaning, among other things, that these shares may not be resold by the purchaser for at least one year from the date of acquisition.

26. Stocker prepared a letter dated February 24 and provided it to eDollars' board of directors (which consisted of Neu and Luscko). The letter stated that eDollars could issue millions of shares of stock in an unregistered offering and that there was no restriction on the resale of those shares of stock.

27. Neu and Luscko used this letter as a pretext for eDollars to conduct an unregistered stock offering and issue millions of shares of purportedly unrestricted stock. Indeed, within days of receiving Stocker's February 24 letter, two of Neu and Luscko's nominees, Frederic Cole and Edward Farley ("Cole" and "Farley"), received over 10 million shares of purportedly unrestricted eDollar stock.

28. Cole and Farley then deposited their shares into brokerage accounts they had opened a few months earlier. Both Neu and Luscko provided their nominees with the necessary documentation to open their respective brokerage accounts.

29. By arming Cole and Farley with eDollars stock and brokerage accounts to use for trading, defendants Neu and Luscko set the stage for their stock manipulation. eDollars' first reported trade took place on March 5, 2004, consisting of 2,000 shares at $.85 per share.

MARCH SPAM E-MAIL CAMPAIGN AND SUBSEQUENT TRADING ACTIVITY

30. On March 8, 2004, Neu and Luscko created and issued a press release in which eDollars announced its formation and described itself as engaged in the business of "payday loans." Concurrent with eDollars' press release, Neu directed defendant Medlin to begin an e-mail campaign in early March 2004, touting eDollars' "tremendously profitable business model" and its potential to make millions of dollars of profit within a few months of operation. The spam e-mails falsely stated that they were distributed by an Internet publication entitled "Breaking Market News," but they were actually written by Neu and Luscko and edited by Medlin. The spam e-mails also failed to disclose Medlin's compensation, which he received through his former attorney, relief defendant Pulisci.

31. Medlin's strategy was to begin bombarding potential investors with the spam e-mails on Friday afternoon, and continue spamming all weekend, to generate a high level of investor interest before trading began on Monday morning. The volume of spam e-mail Medlin disseminated was very high; one recipient reported receiving a dozen different e-mails touting eDollars. Similar touting material was posted to other microcap investment webpages, such as www.hedge-hog.com.

32. The press release in combination with the weekend spam e-mail campaign had a significant effect on eDollars' trading volume and share price. Between Monday, March 8, and Thursday, March 18, eDollars' share price fluctuated between $.35 and $1.80, and its share volume ranged between 650,171

and 3,872,154 shares traded per day. During this same period, nearly two million shares of eDollars were sold from Cole and Farley's brokerage accounts for a net combined gain of $1,690,622. Almost all of the proceeds of these sales were transferred to bank accounts controlled by Neu and Luscko, including bank accounts held by relief defendant Lyons Checkshop.

33. In April 2004, Pulisci established RNTTY Funds, LLC, a Nevada company. Between July 9 and September 17, 2004, Lyons Checkshop wired $540,000 to a bank account controlled by RNTTY. In late April, 2005, RNTTY wrote a check to Pulisci's law firm for $250,000, and on May 25, 2005, RNTTY wired $285,000 to a bank account controlled by Pulisci. The funds wired to RNTTY were meant to be payment to Medlin for the spam e-mail campaign.

MAY SPAM E-MAIL CAMPAIGN AND SUBSEQUENT TRADING ACTIVITY

34. On May 14, 2004, Neu and Luscko created and issued another eDollars' press release describing a "strategic alliance" it had entered into with an online lender. Concurrent with the issuance of this press release, Medlin disseminated spam e-mails at Neu's direction that provided short and long-term price projections for eDollars stock. The e-mails, written by Neu and Luscko and edited by Medlin, claimed that within ten days, eDollars' share price, then trading at $.44 per share, would reach $1.93 per share, and within six months would reach $3.79 per share. These price projections were baseless and were made with the intent of manipulating upward the price of eDollar's stock in the short term. The spam e-mails also discussed and provided a link to the company's press release. The spam e-mails did not disclose the compensation Medlin received for sending the e-mails.

35. During the same period, Cole and Farley's brokerage accounts became active after a one-month period of dormancy, selling a total of 494,280 eDollars shares through their two accounts, for a combined net profit of $179,220. While these accounts were selling shares, several of Neu and Luscko's other

friends were purchasing shares of eDollars. Upon Luscko's recommendation, another of Luscko's friends, Steven Hasenfus ("Hasenfus"), had opened a brokerage account in February 2004. Hasenfus did not begin trading in the account until May 2004, when he wired $22,500 from his bank account (money he had originally obtained from relief defendant Lyons Checkshop) into his brokerage account and began purchasing shares of eDollars. On at least three occasions, between May 20 and May 27, 2004, Hasenfus purchased the exact amount of shares sold from the accounts of Cole and Farley, although at slightly different prices due to the differences in market price at the time of execution.

36. Two of Neu's other friends also began purchasing large amounts of eDollars shares in mid-May. Between May 14 and May 25, 2004, another former college classmate of Neu's, relief defendant Su, purchased 91,303 shares of eDollars through his brokerage account. On May 28, 2004, Lyons Checkshop wired $14,157 into Su's brokerage account. Su eventually sold his entire position in eDollars in July 2004, for a net loss of $10,122.

37. In addition to the trading activity through Su's account, another of Neu's former business associates, Peter Bragansa ("Bragansa"), purchased 45,000 shares of eDollars on May 18, 2004. Bragansa's account was partially funded with a $9,500 wire deposit from Lyons Checkshop. Bragansa eventually sold his entire position in eDollars in late June, and wired the proceeds of the sale to Lyons Checkshop on July 23, 2004.

<u>June Spam E-Mail Campaign And Subsequent Trading Activity</u>

38. On June 16, 2004, Neu and Luscko issued another eDollars press release, announcing the signing of an 18-month agreement with an "industry leading consultancy firm" that purportedly agreed to provide consulting services in the form of "business plan analysis, advisement on potential mergers and acquisitions with other payday lenders and the formal alliance with or acquisition of a federally chartered bank."

39. As in March and May 2004, defendant Medlin, at Neu's direction, conducted a spam e-mail campaign in conjunction with the issuance of the June 16, 2004 press release. The spam e-mails, purportedly sent out by an Internet publication entitled "Emerging Equity Alert," were actually written by Neu and Luscko and edited by Medlin, discussed the recently issued press release, and set a "short-term" price target of $.95 and a "long-term" price target of $2.00. These price projections were baseless and were made with the intent of manipulating upward the price of eDollars' stock in the short term. The spam e-mails did not disclose the compensation Medlin received for sending the e-mails.

40. During this time, Cole and Farley continued to sell eDollars shares through their brokerage accounts. Between June 18 and July 8, 2004, Cole and Farley sold 399,750 shares for a cumulative net gain of $116,256.

41. Since mid-July 2004, in the absence of press releases and spam e-mail campaigns, the price of eDollars stock rapidly declined and soon became worthless. In January 2006, Luscko transferred eDollars to new management.

B. Emerging Holdings

42. In July 2004, Neu and Luscko helped form Emerging Holdings, which incorporated on July 1, 2004. The company is based out of a townhouse owned by the parents of Mohamad Motazedi ("Motazedi"), the company's president, secretary and treasurer. Motazedi was Neu's neighbor while both were children in Florida.

43. On July 6, 2004, at Neu and Luscko's direction, Stocker drafted a securities subscription agreement between Emerging Holdings and a holding company. The agreement provided for Emerging Holdings to sell the holding company 10 million shares of stock for $100,000. Emerging Holdings never received payment of $100,000 from the holding company.

44. On July 7, 2004, Stocker wrote an opinion letter to Emerging Holdings' board of directors as to the propriety of the unregistered stock issuance

to the holding company. Emerging Holdings used this letter as a pretext to conduct an unregistered stock offering and issue millions of shares of purportedly unrestricted stock to the holding company.

45. On July 7, 2004, the holding company received 10 million shares of purportedly unrestricted stock in an unregistered transaction. On that same day, the holding company transferred 9.6 million shares to Neu and Luscko, jointly. Neu and Luscko deposited 9.55 million of these shares into a shared brokerage account, thereby priming themselves to sell the stock as soon as they pumped up the share price.

46. Immediately after Neu and Luscko transferred the Emerging Holdings shares into the shared brokerage account, they caused the company to begin issuing press releases. On Friday, July 9, 2004, Neu and Luscko concocted a press release that the company issued stating that Emerging Holdings was "pleased to announce their Initial Public Offering, with shares to begin trading Monday, July 12, 2004 under the symbol EMRH." Contrary to the representations in the company's July 9 press release, Emerging Holdings did not conduct an initial public offering.

47. Emerging Holdings stock began trading on the over-the-counter market on July 9, 2004, when Farley, at Luscko's direction, placed an unsolicited buy order through his brokerage account for 1,000 shares at $1.00 per share. This transaction effectively set the market price for Emerging Holdings shares.

48. At Neu's direction, Medlin began a spam e-mail campaign at the same time the company issued its press release on July 9 regarding its alleged IPO. The spam e-mail, purportedly sent by "Emerging Equity Alert," falsely stated that Emerging Holdings was involved in "high technology" in the Middle East and China, and referenced the upcoming "IPO." As with the eDollars spam e-mails, the Emerging Holdings e-mail set short-term and long-term price targets for the stock, including an "IPO price" of $1.00 per share, and a three-month target of $15.00 per share. These price projections were baseless, and were made with the

intent of manipulating upward the price of Emerging Holding's stock in the short term. Medlin commenced his intensive spam e-mail campaign, sending out millions of spam e-mails between Friday, July 9 and the morning of Monday, July 12. The spam e-mails did not disclose the compensation Medlin received for sending the e-mails.

49. The press release and spam e-mails had an immediate and significant impact on Emerging Holdings' stock price. Between Monday, July 12 and July 19, 2004, the stock price increased from $1.00 to $1.36, hitting a high of $1.76 by July 13, its second day of trading. Trading volume was also high, reaching over 3 million shares on July 12. In the absence of any subsequent efforts to tout the stock, the price of the stock has fallen rapidly since July 2004. The stock is currently trading at less than $.01 a share.

50. Neu and Luscko immediately began selling their Emerging Holdings shares as soon as the stock price and volume rose in response to the press releases and spam e-mails. Between July 12 and September 22, 2004, their joint brokerage account sold over 2.3 million shares for a net gain of $2,645,939. The majority of their profits came before the end of July 2004, by which time they had netted over $2.5 million in sales. On July 23, Neu and Luscko wired $2.43 million from their brokerage account into Luscko's bank account. On the same day, Luscko wired $1 million from his own bank account to Emerging Holdings' bank account. On July 26, Luscko wired $1.4 million to Lyons Checkshop's bank account.

C. <u>MASSCLICK</u>

51. In July 2004, Neu enlisted another of his friends, Brian Brunette ("Brunette"), to form Massclick. A July 26, 2004 issuer information and disclosure statement issued by the company described Massclick as an "Internet marketing company that brokers the sales of goods and services online." Brunette served as Massclick's president, secretary and treasurer. On July 28, Neu wired $10,000 into Massclick's bank account.

52. Neu and Luscko engaged Stocker to write an opinion letter to Massclick's board of directors as to the propriety of its proposed unregistered sale and issuance of 10 million shares of common stock of Massclick. Massclick used this letter as a pretext to conduct an unregistered stock offering and issue millions of shares of purportedly unrestricted stock.

53. Also on July 26, 2004, Brunette, on behalf of Massclick, executed a securities subscription agreement with a holding company. Pursuant to the terms of the agreement, Massclick agreed to sell 10 million shares of common stock to the holding company for $.01 per share, for a total of $100,000. The next day, Massclick issued 10 million shares of purportedly unrestricted common stock to the holding company in an unregistered offering; the holding company never paid Massclick for these shares. The same day, the holding company transferred 9.75 million shares to relief defendant Su, as well as 250,000 shares to other entities.

54. On Friday, July 30, 2004, Neu and Luscko created a press release issued by Massclick announcing its "Public Offering" with shares scheduled to begin trading on Monday, August 2, 2004. The press release also falsely stated that the company was founded in July 2000 and, contrary to its statement only four days earlier, now claimed to provide "performance-based Internet marketing services and Internet technology solutions to publishers and advertisers nationwide."

55. At the same time the press release was issued, Medlin, at Neu's direction, began another prolific spam e-mail campaign. The spam e-mails, written by Neu and Luscko and edited by Medlin, were similar to the eDollars and Emerging Holdings spam e-mails discussed above. The spam e-mail falsely represented that the company had developed "a proprietary software platform to track and manage sales and advertising for ecommerce companies." The spam e-mail also provided short-term and long-term price projections, including an "IPO" price of $2.12 per share, and a one-month price target of $11.42 per share. These

price projections were baseless, and were made with the intent of manipulating upward the price of Massclick's stock in the short term. Medlin sent millions of spam e-mails between Friday, July 30 and Monday, August 2. The spam e-mails did not disclose the compensation Medlin received for sending the e-mails.

56. The press release and spam e-mail campaign had a significant and immediate effect on Massclick's share price. The company's stock began trading at $2.12 on Monday, August 2, 2004 and rose to $2.75 on August 3. The share price closed as high as $2.00 on August 6, and remained above $1.00 through August 18. Volume was also initially high, peaking at 693,706 shares traded on August 2. After the initial pump, the stock price declined rapidly. The stock currently trades at $.05 per share on low volume.

57. Su deposited the 9.75 million Massclick shares into a brokerage account he opened in July 2004. Between July 30 and August 6, 2004, Su dumped 175,300 shares of Massclick into the open market, selling them for a net gain of $408,142. In mid-September, Su wired $300,884 out of his brokerage account and into his personal bank account, and immediately wired $295,874 into Massclick's bank account.

D. CHINA SCORE

58. Neu directed another business associate, Hongren "Henry" Zhang ("Zhang"), to form China Score in July 2004. Zhang served as the president, secretary and treasurer of the company.

59. In late July 2004, Zhang received a package of documents from Stocker relating to China Score. Neu told Zhang that Stocker was the attorney that he had previously used to bring eDollars public, and that he could do the same for China Score.

60. On August 5, 2004, China Score issued 10 million shares of unrestricted common stock to a holding company in an unregistered offering. The next day, the holding company transferred 10 million shares to one of Luscko's

friends, Hasenfus. Luscko instructed Hasenfus to sign a note promising to pay China Score $1 million in exchange for the shares Hasenfus received. Hasenfus deposited the China Score shares into a newly established brokerage account.

61. On August 7, 2004, Stocker wrote an opinion letter to China Score's board of directors as to the propriety of its just completed sale and issuance of 10 million shares of common stock to the holding company.

62. A few days later, Stocker sent Zhang a securities subscription agreement between China Score and the holding company, by which China Score would sell the holding company 10 million shares of common stock for $.01 per share, or $100,000 total. China Score never received payment for the shares it issued to the holding company.

63. On Friday, August 27, 2004, Neu and Luscko created a press release issued by China Score announcing that the company's "Initial Public Offering" would begin on Monday, August 30. Contrary to the August 27 press release, China Score did not conduct an initial public offering and had no plans to do so. The company issued another press release on September 22, "clarifying" the August 27 release. The September 22 press release represented that "unlike a traditional initial public offering (IPO), this new issue of stock represents the first opportunity for general investors to purchase shares in the company."

64. Concurrent with the August 27 press release, Medlin, at Neu's direction, began a spam e-mail campaign touting China Score's "IPO." According to the spam e-mail, China Score was the "next IPO after the hugely successful Google" IPO. The spam e-mail also set an IPO price-target of $.75, a three-day target of $2.00, and a "longer term" target of $5.10. These price projections were baseless, and were made with the intent of manipulating upward the price of China Score's stock in the short term. As with the eDollars and Emerging Holdings spam e-mails, these spam e-mails were purportedly sent out by "Emerging Equity Alert," but were actually written by Neu and Luscko and edited by Medlin. The investing

public was bombarded with spam e-mails between Friday, August 27 and Monday, August 30. The spam e-mails did not disclose the compensation Medlin received for sending the e-mails.

65. The August 27 press release and subsequent spam e-mails had an immediate and significant effect on China Score's stock price. China Score began trading at $.75 on Monday, August 30 on trading volume of 1,622,761 shares, and reached a high of $1.55 within two days. The pumping activity subsequently ceased, and the stock is currently trading at $.01 per share on low volume.

66. Between September 1 and September 30, 2004, Hasenfus sold 1,856,109 shares of China Score, for a net gain of $1,710,084. Between September 13 and October 1, Hasenfus wired $1.7 million from his brokerage account into his bank account. Lyon's Checkshop ultimately received $1 million of these proceeds.

FIRST CLAIM FOR RELIEF

UNREGISTERED OFFER AND SALE OF SECURITIES

Violations of Sections 5(a) and 5(c) of the Securities Act

(Against Defendants Neu, Luscko, Emerging Holdings, Massclick, and China Score)

67. The Commission realleges and incorporates by reference paragraphs 1 through 66 above.

68. Defendants Neu, Luscko, Emerging Holdings, Massclick, and China Score, and each of them, by engaging in the conduct described above, directly or indirectly, made use of means or instruments of transportation or communication in interstate commerce or of the mails, to offer to sell or to sell securities, or to carry or cause such securities to be carried through the mails or in interstate commerce for the purpose of sale or for delivery after sale.

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

70. By engaging in the conduct described above, defendants Neu, Luscko, Emerging Holdings, Massclick, and China Score violated, and unless restrained and enjoined will continue to violate, Sections 5(a) and 5(c) of the Securities Act, 15 U.S.C. §§ 77e(a) and 77e(c).

SECOND CLAIM FOR RELIEF

FRAUD IN CONNECTION WITH THE PURCHASE OR SALE OF SECURITIES

Violations of Section 10(b) of the Exchange Act and Rule 10b-5 Thereunder

(Against Defendants Neu, Luscko, and Medlin)

71. The Commission realleges and incorporates by reference paragraphs 1 through 66 above.

72. Defendants Neu, Luscko, and Medlin, and each of them, by engaging in the conduct described above, directly or indirectly, in connection with the purchase or sale of a security, by the use of means or instrumentalities of interstate commerce, of the mails, or of the facilities of a national securities exchange, with scienter:

a. employed devices, schemes, or artifices to defraud;

b. made untrue statements of a material fact or omitted to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; or

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

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

THIRD CLAIM FOR RELIEF

FRAUD IN THE OFFER OR SALE OF SECURITIES

Violations of Section 17(b) of the Securities Act

(Against Defendant Medlin)

74. The Commission realleges and incorporates by reference paragraphs 1 through 66 above.

75. Defendant Medlin, by engaging in the conduct described above, by use of means or instrumentalities of interstate commerce or of the mails, gave publicity to a security for consideration received, directly or indirectly, from an issuer, without fully disclosing the receipt of such consideration and the amount thereof.

76. By engaging in the conduct described above, defendant Medlin violated, and unless restrained and enjoined will continue to violate, Section 17(b) of the Securities Act, 15 U.S.C. § 77q(b).

FOURTH CLAIM FOR RELIEF

(Against the Relief Defendants)

77. The Commission realleges and incorporates by reference paragraphs 1 through 66 above.

78. In the manner described above, each relief defendant received ill-gotten gains for which they gave no consideration and to which they have no legitimate claim.

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.

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II.

Issue judgments, in a form consistent with Fed. R. Civ. P. 65(d), permanently enjoining defendants Neu, Luscko, Emerging Holdings, Massclick, and China Score, 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 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 77e(c).

III.

Issue judgments, in a form consistent with Fed. R. Civ. P. 65(d), permanently enjoining defendants Neu, Luscko, and Medlin 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 judgment by personal service or otherwise, and each of them, from violating 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.

Issue judgments, in a form consistent with Fed. R. Civ. P. 65(d), permanently enjoining defendant Medlin 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 judgment by personal service or otherwise, and each of them, from violating Section 17(b) of the Securities Act, 15 U.S.C. § 77q(b).

V.

Order defendants Neu, Luscko, Medlin, Emerging Holdings, Massclick, and China Score, and relief defendants Lyons Checkshop, Pulisci, and Su to disgorge all ill-gotten gains from their illegal conduct, together with prejudgment interest thereon.

VI.

Order defendants Neu, Luscko, and Medlin 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).

VII.

Issue judgments, in a form consistent with Fed. R. Civ. P. 65(d), permanently barring defendants Neu, Luscko, and Medlin 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)].

VIII.

Issue judgments, in a form consistent with Fed. R. Civ. P. 65(d), permanently enjoining defendants Neu and Luscko from participating in the sale or offer to sell any security in an unregistered transaction.

IX.

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.

X.

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

DATED: April 27, 2007

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Securities and Exchange Commission