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10 UNITED STATES DISTRICT COURT  
11 FOR THE DISTRICT OF ARIZONA

12 SECURITIES AND EXCHANGE  
13 COMMISSION,

14 Plaintiff,

15 vs.

16 DAVID B. STOCKER, and  
17 CARRERA CAPITAL, INC.,

18 Defendants.

19 ) No.

20 ) COMPLAINT

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

23 **I. INTRODUCTION**

24 1. This complaint concerns multiple instances of corporate identity theft  
25 perpetrated by David B. Stocker, an attorney in Phoenix, Arizona, and Carrera Capital,  
26 Inc., a Texas corporation that Stocker controls. Beginning in early 2006, Stocker found  
27 several companies whose stock had once traded in the public markets, but that had  
28 become defunct corporations and were no longer operating. Such companies have value  
in the market as public shell companies. When he found such a company, he  
incorporated a new company under the same name in the same State and, using his

1 authority to act for the new company, purported to act on behalf of the old company.  
2 Specifically, Stocker and Carrera Capital caused stock in the old companies to be  
3 exchanged for stock in the new companies under the false pretense that the old company  
4 was undergoing a reverse stock split. These exchanges constituted sales of securities by  
5 Stocker and Carrera Capital, and such sales were not registered with the Commission.  
6 Stocker then caused the new companies to issue large blocks of stock to Carrera Capital  
7 or to other persons, such that he or the other persons beneficially held 99% of the stock  
8 in the new companies. Through this scheme, Stocker and Carrera Capital were able to  
9 gain control of public shells without having to pay for them or otherwise deal with their  
10 former control persons. Stocker and Carrera Capital profited from the scheme by  
11 selling the shells.

12 2. Between April 2006 and July 2006, Defendant David B. Stocker  
13 employed a device, scheme, or artifice to defraud shareholders of at least seven  
14 corporations by acquiring control of each corporate entity through untrue statements  
15 about his relationship with each corporation, and then using his control to sell each  
16 corporation to third parties in exchange for money or property. He made untrue  
17 statements or omissions of material facts about the true identity of the corporate entity  
18 that was offering to sell or purchase shares of seven corporations. He engaged in acts,  
19 practices and courses of conduct that operated as a fraud on the purchasers of the seven  
20 corporations. Through these actions, discussed in more detail below, Stocker violated  
21 the anti-fraud provisions of Section 17(a) of the Securities Act of 1933 as amended  
22 (Securities Act) [15 U.S.C. § 77q(a)], Section 10(b) of the Securities Exchange Act of  
23 1934, as amended, (Exchange Act) [15 U.S.C. § 78j(b)] and Rule 10b-5 adopted under  
24 the Exchange Act [17 C.F.R. § 240.10b-5].

25 3. Defendant Stocker and a corporation that he controlled, defendant Carrera  
26 Capital, Inc., directly and indirectly, offered to sell and sold shares of the seven  
27 corporations when no registration statement had been filed or was in effect with the  
28 Commission to register the defendants' transactions. The defendants' offers and sales

1 of these securities violated the securities registration provisions of Sections 5(a) and (c)  
2 of the Securities Act [15 U.S.C. § 77e (a) and (c)].

3 4. Defendant David B. Stocker is an attorney admitted to the practice of law  
4 before the bar of the State of Arizona. During all times material to this complaint,  
5 Stocker lived, worked, and effected the transactions at issue in or from Phoenix,  
6 Arizona.

7 5. Defendant Carrera Capital, Inc. was a corporation formed in Texas on  
8 June 21, 2005, and during all times material to this complaint, effected the transactions  
9 from its principal place of business, the law offices of David B. Stocker, located in  
10 Phoenix, Arizona. Carrera Capital acted through and is responsible for the acts of, its  
11 officers, directors, employees, or agents.

12 6. Stocker was the president and sole director of Carrera Capital, Inc. during  
13 all times material to this complaint. Stocker, directly or indirectly, controlled Carrera  
14 Capital, Inc. and induced the act or acts constituting the violations or causes of action  
15 alleged in this complaint.

16 7. Stocker, directly and indirectly, has engaged in and unless restrained and  
17 enjoined by this Court will in the future engage in, transactions, acts, practices, and  
18 courses of business that violate Sections 5(a), 5(c), and 17(a) of the Securities Act,  
19 Section 10(b) of the Exchange Act, and Rule 10b-5.

20 8. Carrera Capital, directly and indirectly, has engaged in and unless  
21 restrained and enjoined by this Court will in the future engage in, transactions, acts,  
22 practices, and courses of business that violate Sections 5(a) and 5(c) of the Securities  
23 Act.

24 9. In connection with the transactions, acts, practices, and courses of  
25 business described in this Complaint, each of the defendants, directly and indirectly,  
26 have made use of the means or instrumentalities of interstate commerce, of the mails, or  
27 of the means and instruments of transportation or communication in interstate  
28 commerce.



1                                   **III. STOCKER ENGAGED IN SECURITIES FRAUD**

2           **A. Stocker Engaged in Securities Fraud By Creating a New Corporation,**  
3           **Ergonomic Enterprises Inc., which Fraudulently Assumed the**  
4           **Identity of an Existing Inactive Shell, Avalon Stores, Inc.**

5           16. Upon information and belief, Stocker knew in April 2006 that a public  
6 company named Avalon Stores, Inc. had been previously incorporated in the State of  
7 Minnesota, that the company's shares had been publicly traded in the over-the-counter  
8 market under the trading symbol "AVNS" with the unique CUSIP number 053479101,  
9 and that the company's shares were no longer actively trading. This pre-existing public  
10 company is referred to in this complaint as "Avalon Stores Old." A CUSIP number is a  
11 unique number assigned to a particular security by Standard & Poor's.

12           17. With knowledge of the pre-existing company, Stocker incorporated a new  
13 company with the same name, Avalon Stores Inc., with the State of Minnesota. He  
14 signed articles of incorporation and, using the means of interstate commerce or the  
15 mails, caused the articles of incorporation to be filed with the State of Minnesota on  
16 April 17, 2006. This new company is referred to in this complaint as "Avalon Stores  
17 New."

18           18. Stocker was the sole officer and director of Avalon Stores New.

19           19. On April 21, 2006, Stocker, acting as the sole officer and director of  
20 Avalon Stores New and also as the president of its purported majority shareholder,  
21 Carrera Capital, signed a Unanimous Written Consent of the Board of Directors and  
22 Majority Shareholder in Lieu of Special Meeting (Avalon Consent) that changed the  
23 name of Avalon Stores New to Ergonomic Enterprises Inc. and authorized the company  
24 to conduct a 1 share for 100 share reverse split of its common stock. In the Avalon  
25 Consent, Stocker falsely represented that Carrera Capital was the majority shareholder  
26 of Avalon Stores, Inc. However, contrary to the representation, Carrera Capital did not  
27 own any shares of Avalon Stores New or Avalon Stores Old as of this date.

28

1           20.    In furtherance of his scheme, Stocker caused amended articles of  
2 incorporation to be filed with the State of Minnesota on April 20, 2006, changing the  
3 name of the company from Avalon Stores, Inc. to Ergonomic Enterprises, Inc.

4           21.    On April 25, 2006, Stocker contracted with Manhattan Transfer Registrar  
5 Company (Manhattan Transfer), located in Miller Place, New York, to serve as the  
6 transfer agent for Ergonomic Enterprises and provide transfer services including the  
7 issuance and transfer of new stock certificates.

8           22.    On May 3, 2006, Stocker sent a letter to The Nasdaq Stock Market, Inc.,  
9 with a copy to Manhattan Transfer, in which he represented that Avalon Stores Inc.,  
10 which traded under the symbol "AVNS" with CUSIP number 053479101, was changing  
11 its name to Ergonomic Enterprises, Inc. and conducting a reverse split of 1 share for 100  
12 shares. He also represented that shareholder approval had been obtained, and submitted  
13 a copy of the Avalon Consent.

14           23.    Stocker's statements to The Nasdaq Stock Market, Inc. and Manhattan  
15 Transfer in the May 3, 2006 letter were false and misleading. Avalon Stores New had  
16 never traded under the symbol "AVNS." The common stock of Avalon Stores Old had  
17 been assigned the unique CUSIP number 053479101. Stocker omitted to disclose the  
18 material fact that Avalon Stores New and Avalon Stores Old, while sharing the same  
19 name, were different entities. He omitted to disclose that he was not an officer or  
20 director, and Carrera Capital was not a shareholder, of Avalon Stores Old on May 3,  
21 2006. He misrepresented that the Avalon Consent was from the shareholders of Avalon  
22 Stores Old. He did not possess a board of directors' resolution and shareholder consent  
23 from Avalon Stores Old. In fact, Avalon Stores Old had not authorized a name change  
24 or reverse split.

25           24.    Stocker knew that his statements to The Nasdaq Market, Inc. and  
26 Manhattan Transfer in the May 3, 2006 letter were untrue and that he had omitted  
27 material facts necessary to make the statements he had made not misleading. He knew  
28 from his participation in the incorporation of Avalon Stores New on April 17, 2006, that

1 he was the president and director of Avalon Stores New rather than the pre-existing  
2 company known as Avalon Stores Old, which had traded under the symbol "AVNS" or  
3 CUSIP number 053479101. He also knew that Avalon Stores New was the entity that  
4 was changing its name and offering to sell shares under the guise of a reverse split  
5 rather than Avalon Stores Old as he represented to Manhattan Transfer and The Nasdaq  
6 Stock Market, Inc. He knew that Carrera Capital did not own any shares of Avalon  
7 Stores Old or Avalon Stores New on May 3, 2006.

8 25. Based on Stocker's May 3, 2006 letter, The Nasdaq Stock Market, Inc.  
9 posted an announcement on its Daily List on May 14, 2006, that Avalon Stores Old was  
10 changing its name to Ergonomic Enterprises Inc. and conducting a 1 for 100 reverse  
11 split. The Daily List was republished on the Internet at <http://www.otcbb.com/dailylist> .

12 26. Stocker caused Manhattan Transfer to submit a Transfer Agent  
13 Verification Form on May 4, 2006 to The Nasdaq Stock Market, Inc., that falsely  
14 represented that Avalon Stores Old, with CUSIP number 053479101, was changing its  
15 name effective May 15, 2006, and conducting a reverse split to reduce its outstanding  
16 shares from 830,000 to 8,300.

17 27. Stocker caused Manhattan Transfer to send a notice to the Depository  
18 Trust & Clearing Company that Avalon Stores Old was changing its name to  
19 Ergonomic Enterprises, Inc. and conducting a reverse split of 1 share for 100 shares  
20 effective on May 15, 2006. Manhattan Transfer's communication with the Depository  
21 Trust & Clearing Company was in effect an offer by Stocker and Carrera Capital to  
22 purchase Avalon Stores Old shares in exchange for new shares in Ergonomic  
23 Enterprises, Inc.

24 28. The Depository Trust & Clearing Company is a central securities  
25 repository where stock certificates are exchanged. The Depository Trust & Clearing  
26 Company holds stock certificates on behalf of shareholders and brokerage firms, and  
27 records exchanges of ownership through entries on its books and records. When a  
28 reverse split is announced The Depository Trust & Clearing Company submits the stock

1 certificates that it holds, on behalf of shareholders and brokerage firms, for exchange  
2 into the new certificates.

3 29. In response to Stocker's offer, the Depository Trust & Clearing Company  
4 sent by means of interstate commerce stock certificates for 107,313 shares of Avalon  
5 Stores Old to Manhattan Transfer to be exchanged for 1,075 shares of Ergonomic  
6 Enterprises. This transaction constituted the purchase or sale of securities, in that a  
7 security of one company was exchanged for a security of another company.

8 30. Stocker obtained property, the 107,313 shares of Avalon Stores Old from  
9 the Depository Trust & Clearing Company, by means of untrue statements that Avalon  
10 Stores Old was changing its name to Ergonomic Enterprises and conducting a 1 share  
11 for 100 share reverse split.

12 31. Stocker's transaction, practice, and course of business in creating a new  
13 corporation with the same name as Avalon Stores Old, and fraudulently taking over the  
14 identity of the pre-existing company, operated as a fraud or deceit upon the Depository  
15 Trust & Clearing Company and other shareholders, because Depository Trust &  
16 Clearing Company exchanged the Avalon Stores Old shares it held on behalf of various  
17 public shareholders for Ergonomic Enterprises shares under the false belief that it was  
18 receiving shares in the same company, when in fact it was receiving shares in a new and  
19 unrelated company.

20 32. On or about June 13, 2006, Stocker instructed Manhattan Transfer to issue  
21 50,000,000 shares of Ergonomic Enterprises to Carrera Capital. After this transaction,  
22 Carrera Capital owned over 99 percent of the shares of Ergonomic Enterprises.

23 33. Through the actions described above, Stocker created the false appearance  
24 that he had taken over Avalon Stores Old and changed its name to Ergonomic  
25 Enterprises. He then offered the company for sale as a publicly traded shell.

26 34. On or about June 13, 2006, Stocker, acting as the director of Ergonomic  
27 Enterprises and as the sole principal of Carrera Capital, sold 50,000,000 shares and  
28 control of Ergonomic Enterprises, to a third party for approximately \$150,000. Stocker

1 and Carrera obtained the \$150,000 by means of untrue statements that Ergonomic  
2 Enterprises was the successor to the publicly traded Avalon Stores Old.

3 **B. Stocker Engaged in Securities Fraud By Creating a New Corporation,**  
4 **Viking Consolidated Inc., which Fraudulently Assumed the Identity**  
5 **of an Existing Inactive Shell, Westmark Group Holdings Inc.**

6 35. Upon information and belief, Stocker knew in April 2006 that a public  
7 company named Westmark Group Holdings, Inc. had been previously incorporated in  
8 the State of Delaware, that the company had filed periodic reports with the Commission,  
9 that the company's shares had been publicly traded in the over-the-counter market under  
10 the trading symbol "WGHI" with CUSIP number 960577401, and that the company's  
11 shares were no longer actively trading. This pre-existing public company is referred to  
12 in this complaint as "Westmark Old."

13 36. With knowledge of the pre-existing company, Stocker incorporated a new  
14 company with the same name, Westmark Group Holdings, Inc., with the State of  
15 Delaware. He signed a certificate of incorporation and, using the means of interstate  
16 commerce or the mails, caused the certificate to be filed with the State of Delaware on  
17 April 17, 2006. This new company is referred to in this complaint as "Westmark  
18 New."

19 37. Stocker was the sole officer and director of Westmark New.

20 38. On April 18, 2006, Stocker, acting as the sole officer and director of  
21 Westmark New and also as the president of its purported majority shareholder, Carrera  
22 Capital, signed a Unanimous Written Consent of the Board of Directors and Majority  
23 Shareholder in Lieu of Special Meeting (Amended) (Westmark Consent) that changed  
24 the company's name to Viking Consolidated, Inc. and authorized the company to  
25 conduct a 1 share for 100 shares reverse split of Westmark common stock on the  
26 effective date of May 15, 2006. In the Westmark Consent, Stocker falsely represented  
27 that Carrera Capital was the majority shareholder of Westmark Group Holdings, Inc. In  
28

1 fact, Carrera Capital owned no shares of either Westmark Old or Westmark New on  
2 April 18, 2006.

3 39. In furtherance of his scheme, Stocker caused a Certificate of Amendment  
4 of Certificate of Incorporation to be filed with the State of Delaware on April 18, 2006  
5 changing the name of Westmark Group Holdings, Inc. to Viking Consolidated, Inc. He  
6 falsely represented that a special meeting of shareholders had been held and the  
7 necessary number of shares as required by statute were voted in favor of the  
8 amendment. In fact, Carrera Capital did not own any shares in Westmark Old or  
9 Westmark New as of April 18, 2006.

10 40. On April 21, 2006, Stocker contracted with Manhattan Transfer to serve  
11 as the transfer agent for Viking Consolidated, Inc. and provide transfer services  
12 including the issuance, and transfer of new stock certificates.

13 41. In late April or early May, 2006, Stocker told one of the partners of  
14 Manhattan Transfer that Viking Consolidated, Inc. was formerly Westmark Group  
15 Holdings, Inc., and that it was the same company as the Westmark Old, which had been  
16 publicly traded in the over-the-counter market under the trading symbol "WGHI" and  
17 CUSIP number 960577401. Stocker falsely represented that he was an officer and  
18 director of Westmark Old, and that Westmark Old had changed its name to Viking  
19 Consolidated, Inc. and was conducting a reverse split of its shares.

20 42. On April 28, 2006, Stocker sent an email to one of the partners at  
21 Manhattan Transfer advising him that:

22 I checked the SEC filings for these [companies].

23 Viking Consolidated fka Westmark Group: 3,768,377

24 MMT Resources fka Electronic Transmission Corp.: 16,249,997

25 SN United fka Accel International Corp.: 9,997,234

26 Please prepare Nasdaq t/a forms.

27 Upon information and belief, the numbers Stocker inserted next to the name of each  
28 company reflected the number of outstanding shares last reported.

1           43.     In furtherance of the scheme, Stocker also filed with the Commission on  
2 April 28, 2006, a Form 15 on behalf of Westmark Old in which he falsely represented  
3 that he was the president of Westmark Old, and requested that the company's duty to  
4 file reports be terminated or suspended under Rule 12g-4(a)(1)(i) of the Exchange Act.

5           44.     On May 3, 2006, Stocker sent a letter to The Nasdaq Stock Market, Inc.  
6 with a copy to Manhattan Transfer in which he represented that Westmark Old, which  
7 had traded under the symbol "WGHI" with CUSIP number 960577401, was changing  
8 its name to Viking Consolidated, Inc. and conducting a reverse split of 1 share for 100  
9 shares. He also represented that shareholder approval had been obtained, and  
10 submitted a copy of the Westmark Consent.

11           45.     Stocker's statements to The Nasdaq Stock Market, Inc. and Manhattan  
12 Transfer in the May 3, 2006 letter were false and misleading. Westmark New had never  
13 traded under the symbol "WGHI." The common stock of Westmark Old had been  
14 assigned the unique CUSIP number 960577401. Stocker omitted to disclose the  
15 material fact that Westmark New and Westmark Old, while sharing the same name,  
16 were different entities. He omitted to disclose that he was not an officer or director, and  
17 Carrera Capital was not a shareholder, of Westmark Old on May 3, 2006. He  
18 misrepresented that the Westmark Consent had been obtained from the shareholders of  
19 Westmark Old. He did not possess a board of directors' resolution and shareholder  
20 consent from Westmark Old. In fact, Westmark Old had not authorized a name change  
21 or reverse split.

22           46.     Stocker knew that his statements to The Nasdaq Market, Inc. and  
23 Manhattan Transfer in the May 3, 2006 letter were untrue and that he had omitted  
24 material facts necessary to make the statements he had made not misleading. He knew  
25 from his participation in the incorporation of Westmark New on April 14, 2006, that he  
26 was the president and director of Westmark New rather than the pre-existing company  
27 known as Westmark Old that had traded under the symbol "WGHI" or CUSIP number  
28 960577401. He also knew that Westmark New was the entity that was changing its

1 name and offering to sell shares in the guise of a reverse split rather than Westmark Old.  
2 He knew that Carrera Capital did not own any shares of Westmark Old or Westmark  
3 New on May 3, 2006.

4 47. Stocker caused Manhattan Transfer to submit a Transfer Agent  
5 Verification Form to The Nasdaq Stock Market, Inc. on May 4, 2006, that falsely  
6 represented that Westmark Old, with CUSIP number 960577401, was changing its  
7 name effective May 15, 2006, and conducting a reverse split to reduce its outstanding  
8 shares from 3,700,000 to 37,000.

9 48. Stocker caused Manhattan Transfer to send a notice to the Depository  
10 Trust & Clearing Company that Westmark Old was changing its name to Viking  
11 Consolidated, Inc. and conducting a reverse split of 1 share for 100 shares effective on  
12 May 15, 2006. Manhattan Transfer's communication with the Depository Trust &  
13 Clearing Company was in effect an offer by Stocker and Carrera Capital to purchase the  
14 Westmark Old shares it held on behalf of various public shareholders in exchange for  
15 new shares in Viking Consolidated, Inc.

16 49. In response to Stocker's offer, the Depository Trust & Clearing Company  
17 sent by means of interstate commerce the stock certificates for 2,872,784 shares of  
18 Westmark Old to Manhattan Transfer to be exchanged for 28,769 shares of Viking  
19 Consolidated, Inc. Additional brokerage firms and shareholders submitted separate  
20 requests to receive additional shares of Viking Consolidated, Inc. in exchange for  
21 fractional shares of Westmark Old. These transactions constituted sales of securities, in  
22 that a security of one company was exchanged for a security of another company.

23 50. Stocker obtained property, the 2,872,784 shares of Westmark Old from  
24 the Depository Trust & Clearing Company and other shareholders, by means of untrue  
25 statements that Westmark Old was changing its name to Viking Consolidated, Inc. and  
26 conducting a 1 share for 100 share reverse split.

27 51. Stocker's transaction, practice, and course of business in creating a new  
28 corporation with the same name as Westmark Old, and fraudulently taking over the

1 identity of the pre-existing company, operated as a fraud or deceit upon the Depository  
2 Trust & Clearing Company and other shareholders, because they exchanged their shares  
3 of Westmark Old for shares of Viking Consolidated Inc. under the false belief that they  
4 were receiving shares in the same company when in fact they were receiving shares in a  
5 new and unrelated company.

6 52. On or about June 12, 2006, Stocker instructed Manhattan Transfer to issue  
7 50,000,000 shares of Viking Consolidated, Inc. to Carrera Capital. After this  
8 transaction, Carrera Capital owned over 99 percent of the shares of Viking  
9 Consolidated, Inc.

10 53. By means of the actions described above, Stocker created the false  
11 appearance that he had taken over Westmark Old, which then became Viking  
12 Consolidated, Inc. He then offered the company for sale as a publicly traded shell.

13 54. On or about June 13, 2006, Stocker, acting as the director of Viking  
14 Enterprises, Inc, and as the as the sole principal of Carrera Capital, offered and sold the  
15 50,000,000 shares of Viking Consolidated, Inc. to a third party (Boodoosingh) for an  
16 unknown amount of money or property. Stocker and Carrera obtained the money or  
17 property as consideration for these shares by means of the untrue statements that Viking  
18 Consolidated, Inc. was the successor to the publicly traded Westmark Old.

19 **C. Stocker Engaged in Securities Fraud By Creating a New Corporation,**  
20 **MMT Resources, Inc., which Fraudulently Assumed the Identity of**  
21 **an Existing Inactive Shell, Electronic Transmissions Corp.**

22 55. Upon information and belief, Stocker knew in April 2006 that a public  
23 company named Electronic Transmission Corp. had been previously incorporated in the  
24 State of Delaware, that the company had filed periodic reports with the Commission,  
25 that the company's shares had been publicly traded in the over-the-counter market under  
26 the trading symbol "ETSM" with CUSIP number 286002209, and that the company's  
27 shares were no longer actively trading. This pre-existing public company is referred to  
28

1 in this complaint as “Electronic Transmission Old.” See allegation in paragraph 42  
2 above which are incorporated into this paragraph.

3 56. With knowledge of the pre-existing company, Stocker incorporated a new  
4 company with the same name, Electronic Transmission Corp., with the State of  
5 Delaware. He signed a certificate of incorporation and, using the means of interstate  
6 commerce or transportation or the mails, caused the certificate to be filed with the State  
7 of Delaware on April 17, 2006. This new company is referred to in this complaint as  
8 “Electronic Transmission New.”

9 57. Stocker was the sole officer and director of Electronic Transmission New.

10 58. On April 18, 2006, Stocker, acting as the sole officer and director of  
11 Electronic Transmission New and also as the president of its purported majority  
12 shareholder, Carrera Capital, signed a Unanimous Written Consent of the Board of  
13 Directors and Majority Shareholder in Lieu of Special Meeting (Amended) (referred to  
14 as the Electronic Transmission Consent) which changed the name of Electronic  
15 Transmission New to MMT Resources Inc. In the Electronic Transmission Consent,  
16 Stocker falsely represented that Carrera Capital was the majority shareholder of  
17 Electronic Transmission Corporation. However, Carrera Capital did not own any shares  
18 of Electronic Transmission New or Electronic Transmission Old as of this date.

19 59. In furtherance of his scheme, Stocker filed a Certificate of Amendment of  
20 Certificate of Incorporation with the State of Delaware on April 18, 2006, representing  
21 that the name of Electronic Transmission Corporation had been changed to MMT  
22 Resources, Inc. He falsely represented that a special meeting of shareholders had been  
23 held and that the necessary number of shares as required by statute had been voted in  
24 favor of the amendment.

25 60. On April 21, 2006, Stocker contracted with Manhattan Transfer to serve  
26 as the transfer agent for Electronic Transmission and provide transfer services including  
27 the issuance and transfer of new stock certificates.

28

1           61.    On April 28, 2006, Stocker sent a letter to The Nasdaq Stock Market, Inc.,  
2 with a copy to Manhattan Transfer, in which he represented that Electronic  
3 Transmission Corporation, which had traded under the symbol “ETSM,” was changing  
4 its name to MMT Resources, Inc. and conducting a reverse split of 1 share for 100  
5 shares. He also represented that shareholder approval had been obtained, and  
6 submitted a copy of the Electronic Transmission Consent.

7           62.    Stocker’s statements to the Nasdaq Stock Market, Inc. and Manhattan  
8 Transfer in the April 28, 2006 letter were false and misleading. Electronic  
9 Transmission New had never traded under the symbol “ETSM.” Stocker omitted to  
10 disclose the material fact that Electronic Transmission New and Electronic  
11 Transmission Old, while sharing the same name, were different entities. He omitted to  
12 disclose that he was not an officer or director, and Carrera Capital was not a shareholder  
13 of Electronic Transmissions Old. He did not possess any resolution or consent from the  
14 board of directors and shareholders of Electronic Transmission Old. In fact, Electronic  
15 Transmission Old had not authorized a name change or reverse split.

16           63.    Stocker sent an email on April 28, 2006, to one of the partners of  
17 Manhattan Transfer and advised him that MMT Resources fka Electronic Transmission  
18 Corp. had 16,249,997 shares outstanding as reported in its SEC filings.

19           64.    On May 1, 2006, Stocker sent an email to one of the partners of  
20 Manhattan Transfer and falsely represented that Electronic Transmission New had the  
21 trading symbol “EMTS” and the CUSIP number 286002209. Stocker knew Electronic  
22 Transmission New had not traded under the symbol “EMTS” and that the common  
23 stock of Electronic Transmission Old had been assigned the unique CUSIP number  
24 960577401.

25           65.    Stocker caused Manhattan Transfer to submit a Transfer Agent  
26 Verification Form to The Nasdaq Stock Market, Inc. on May 1, 2006, that falsely  
27 represented that Electronic Transmission Old, with CUSIP number 286002209, was  
28

1 changing its name effective May 8, 2006, and conducting a reverse split to reduce its  
2 outstanding shares from 16,249,997 to 162,500.

3 66. Stocker knew that his statements to The NASDAQ Market, Inc. and  
4 Manhattan Transfer in the April 28, 2006 letter and emails to Manhattan Transfer were  
5 untrue and that he had omitted material facts necessary to make the statements he had  
6 made not misleading. He knew from his participation in the incorporation of Electronic  
7 Transmission New on April 17, 2006, that he was the president and director of  
8 Electronic Transmission New rather than the pre-existing company known as Electronic  
9 Transmission Old, which had traded under the symbol "ETSM" or CUSIP number  
10 286002209. He also knew that Electronic Transmission New was the entity that was  
11 changing its name and offering to sell shares under the guise of a reverse split rather  
12 than Electronic Transmission Old as he represented to The NASDAQ Market, Inc. and  
13 Manhattan Transfer. He knew that Carrera Capital did not own any shares of Electronic  
14 Transmission Old or Electronic Transmission New on April 28, 2006.

15 67. Based on Stocker's April 28, 2006 letter, The Nasdaq Stock Market, Inc.  
16 posted an announcement on its Daily List on May 8, 2006, that Electronic Transmission  
17 Old was changing its name to MMT Resources Inc. and conducting a 1 for 100 reverse  
18 split. The Daily List was republished on the Internet at <http://www.otcbb.com/dailylist>.

19 68. Stocker caused Manhattan Transfer to send a notice to the Depository  
20 Trust & Clearing Company that Electronic Transmission was changing its name to  
21 MMT Resources, Inc. and conducting a reverse split of 1 share for 100 shares effective  
22 on May 8, 2006. Manhattan Transfer's communication with the Depository Trust &  
23 Clearing Company was in effect an offer by Stocker and Carrera Capital to purchase the  
24 Electronic Transmission Old shares it held on behalf of public shareholders in exchange  
25 for new shares in MMT Resources, Inc.

26 69. In response to Stocker's offer, the Depository Trust & Clearing Company  
27 sent by means of interstate commerce stock certificates for 2,379,433 shares of  
28 Electronic Transmission Old to Manhattan Transfer to be exchanged for 23,794 shares

1 of MMT Resources, Inc. This transaction constituted the purchase or sale of securities,  
2 in that a security of one company was exchanged for a security of another company.

3 70. Stocker obtained property, the 2,379,433 shares of Electronic  
4 Transmission Old from the Depository Trust & Clearing Company, by means of untrue  
5 statements that Electronic Transmission Old was changing its name to MMT Resources,  
6 Inc. and conducting a 1 share for 100 share reverse split.

7 71. Stocker's transaction, practice, and course of business in creating a new  
8 corporation with the same name as Electronic Transmission Old, and fraudulently  
9 taking over the identity of the pre-existing company, operated as a fraud or deceit upon  
10 the Depository Trust & Clearing Company and other shareholders, because they  
11 exchanged their shares of Electronic Transmission Old for shares of MMT Resources,  
12 Inc. under the false belief that they were receiving shares in the same company when in  
13 fact they were receiving shares in a new and unrelated company.

14 72. On or about May 9, 2006, Stocker instructed Manhattan Transfer to issue  
15 50,000,000 shares of MMT Resources, Inc. to Carrera Capital and send the certificate  
16 by Federal Express to Carrera Capital in Phoenix, Arizona. After this transaction,  
17 Carrera Capital owned over 99 percent of the shares of MMT Resources, Inc.

18 73. Through the actions described above, Stocker created the false appearance  
19 that he had taken over Electronic Transmission Old and changed its name to MMT  
20 Resources, Inc.

21 74. On May 10 and 11, 2006, attorneys for Acceptus, Inc., which was  
22 formerly known as Electronic Transmission Corporation Old, contacted Stocker and  
23 Manhattan Transfer by telephone and letters complaining that Stocker had  
24 misappropriated the CUSIP number 286002209 that was assigned to Electronic  
25 Transmission Corporation when it became a public company. They complained that the  
26 notification Stocker authorized to be sent to shareholders about the reverse split and  
27 name change to MMT Resources, Inc., using the CUSIP number previously granted to  
28 Electronic Transmission Old, was causing significant confusion, which if not corrected

1 would damage the shareholders of Acceptius, Inc. The attorneys requested that Stocker  
2 “fix” the matter, so that none of the shareholders of Acceptius, Inc. would be out of  
3 money, lose their certificates or other evidences of ownership.

4 75. As a result of these letters, Stocker took a series of actions to reverse his  
5 misappropriation of the identity of Electronic Transmissions Old, including cancelling  
6 the MMT Resources shares issued to Carrera, advising the Nasdaq Stock Market Inc.  
7 that MMT Resources, Inc. was changing its name back to Electronic Transmission  
8 Corporation, authorizing a forward split of 1 for 100 shares, and reversing the share  
9 conversions with The Depository Trust & Clearing Corporation and other shareholders.

10 **D. Stocker Engaged in Securities Fraud By Creating a New Corporation,**  
11 **SN United Enterprises, Inc., which Fraudulently Assumed the**  
12 **Identity of an Existing Inactive Shell, Accel International**  
13 **Corporation.**

14 76. Upon information and belief, Stocker knew in April 2006 that a public  
15 company named Accel International Corporation had been previously incorporated in  
16 the State of Delaware, that the company had filed periodic reports with the Commission,  
17 that the company’s shares had been publicly traded in the over-the-counter market under  
18 the trading symbol “ACLE” with CUSIP number 004299103, and that the company’s  
19 shares were no longer actively trading. See allegation in paragraph 42 above which are  
20 incorporated into this paragraph. This pre-existing public company is referred to in this  
21 complaint as “Accel Old.”

22 77. With knowledge of the pre-existing company, Stocker incorporated a new  
23 company with the same name, Accel International Corporation, with the State of  
24 Delaware. He signed a certificate of incorporation and, using the means of interstate  
25 commerce or transportation, or the mails, caused the certificate to be filed with the State  
26 of Delaware on April 17, 2006. This new company is referred to in this complaint as  
27 “Accel New.”

28 78. Stocker was the sole officer and director of Accel New.

1           79.    On April 18, 2006, Stocker, acting as the sole officer and director of Accel  
2 New and also as the president of its purported majority shareholder, Carrera Capital,  
3 signed a Unanimous Written Consent of the Board of Directors and Majority  
4 Shareholder in Lieu of Special Meeting (Amended) (Accel Consent) that changed the  
5 name of Accel New to SN United Enterprises, Inc. and authorized the company to  
6 conduct a 1 share for 100 shares reverse split of Accel common stock. In the Accel  
7 Consent, Stocker falsely represented that Carrera Capital was the majority shareholder  
8 of Accel International Corporation. However, contrary to this representation, Carrera  
9 Capital did not own any shares of Accel New or Accel Old as of April 18, 2006.

10           80.    In furtherance of his scheme, Stocker filed a Certificate of Amendment of  
11 Certificate of Incorporation with the State of Delaware on April 18, 2006 representing  
12 that the name of Accel International Corporation had been changed to SN United  
13 Enterprises, Inc. He falsely represented that a special meeting of shareholders had been  
14 held and that the necessary number of shares as required by statute had been voted in  
15 favor of the amendment.

16           81.    On April 21, 2006, Stocker contracted with Manhattan Transfer to serve  
17 as the transfer agent for the company and provide transfer services including the  
18 issuance and transfer of new stock certificates.

19           82.    In an April 28, 2006 email sent to one of the partners of Manhattan  
20 Transfer, Stocker falsely represented that SN United was formerly known as Accel  
21 International Corporation and its SEC filings indicated it had 9,997,234 shares  
22 outstanding. He omitted to disclose the material fact that the SEC filings and  
23 outstanding shares referred to the pre-existing corporation Accel Old rather than Accel  
24 New, which was the corporation Stocker had incorporated on April 17, 2006. On May 1,  
25 2006, Stocker falsely represented to Manhattan Transfer in an email that the CUSIP  
26 number 004299103 belonged to Accel International. However, he omitted to disclose  
27 that this CUSIP number had been assigned to Accel Old, rather than Accel New.

28

1           83.     On April 28, 2006, Stocker sent a letter to The Nasdaq Stock Market, Inc.,  
2 with a copy to Manhattan Transfer, in which he falsely represented that Accel  
3 International Corporation, which traded under the symbol “ACLE,” was changing its  
4 name to SN United Enterprises, Inc. and conducting a reverse split of 1 share for 100  
5 shares. He represented that shareholder approval had been obtained and submitted a  
6 copy of the Accel Consent.

7           84.     Stocker’s statements to The Nasdaq Stock Market, Inc. and Manhattan  
8 Transfer in the April 28, 2006 letter were false and misleading. Accel New had never  
9 traded under the symbol “ACLE.” The common stock of Accel Old had been assigned  
10 the unique CUSIP number 004299103. Stocker omitted to disclose the material fact that  
11 Accel New and Accel Old, while sharing the same name, were different entities. He  
12 omitted to disclose that he was not an officer or director, and Carrera Capital was not a  
13 shareholder of Accel Old on April 28, 2006. He misrepresented that the Accel Consent  
14 was from the shareholders of Accel Old. He did not possess a board of directors’  
15 resolution and shareholder consent from Accel Old. In fact, Accel Old had not  
16 authorized a name change or reverse split.

17           85.     Stocker caused Manhattan Transfer to submit a Transfer Agent  
18 Verification Form on May 1, 2006 to The Nasdaq Stock Market, Inc., that falsely  
19 represented that Accel Old, with CUSIP number 004299103, was changing its name  
20 effective May 8, 2006, and conducting a reverse split to reduce its outstanding shares  
21 from 9,997,234 to 99,972.

22           86.     Based on Stocker’s May 1, 2006 letter, The Nasdaq Stock Market, Inc.  
23 posted an announcement on its Daily List on May 8, 2006, that Avalon Stores Old was  
24 changing its name to Ergonomic Enterprises Inc. and conducting a 1 for 100 reverse  
25 split. The Daily List was republished on the Internet at <http://www.otcbb.com/dailylist> .

26           87.     Stocker knew that his statements made to The NASDAQ Market, Inc. and  
27 Manhattan Transfer about the name change for Accel Old and the reverse split were  
28 untrue and that he had omitted material facts necessary to make the statements he had

1 made not misleading. He knew from his participation in the incorporation of Accel  
2 New on April 17, 2006, that he was the president and director of Accel New rather than  
3 the pre-existing company known as Accel Old, which had traded under the symbol  
4 “ACLE” or CUSIP number 004299103. He also knew that Accel New was the entity  
5 that was changing its name and offering shares in the guise of a reverse split rather than  
6 Accel Old. He knew that Carrera Capital did not own any shares of Accel Old or Accel  
7 New on May 1, 2006.

8 88. Stocker caused Manhattan Transfer to send a notice to the Depository  
9 Trust & Clearing Company that Accel Old was changing its name to SN United  
10 Enterprises, Inc. and conducting a reverse split of 1 share for 100 shares effective on  
11 May 8, 2006. Manhattan Transfer’s communication with the Depository Trust &  
12 Clearing Company was in effect an offer by Stocker and Carrera Capital to purchase the  
13 Accel Old shares it held on behalf of the public shareholders in exchange for new shares  
14 in SN United Enterprises, Inc.

15 89. In response to Stocker’s offer, the Depository Trust & Clearing Company  
16 sent on May 10, 2006, by means of interstate commerce, the share certificates for  
17 8,006,019 shares of Accel Old to Manhattan Transfer to be exchanged for 80,080 shares  
18 of SN United Enterprises, Inc. This transaction constituted a sale of securities, in that a  
19 security of one company was exchanged for a security of another company.

20 90. Stocker obtained property, the 8,006,019 shares of Accel Old from the  
21 Depository Trust & Clearing Company, by means of untrue statements that Accel Old  
22 was changing its name to SN United Enterprises, Inc. and conducting a 1 share for 100  
23 share reverse split.

24 91. Stocker’s transaction, practice, and course of business in creating a new  
25 corporation with the same name as Accel Old, and fraudulently taking over the identity  
26 of the pre-existing company, operated as a fraud or deceit upon the Depository Trust &  
27 Clearing Company and other shareholders, because they exchanged their shares of  
28 Accel Old for shares of SN United Enterprises, Inc. under the false belief that they were

1 receiving shares in the same company when in fact they were receiving shares in a new  
2 and unrelated company.

3 92. On May 9, 2006, Stocker instructed Manhattan Transfer to issue  
4 50,000,000 shares of SN United Enterprises, Inc. to Carrera Capital. After this  
5 transaction, Carrera Capital owned over 99 percent of the shares of SN United  
6 Enterprises, Inc.

7 93. By means of the transactions described above, Stocker created the false  
8 appearance that he had taken over Accel Old, and changed its name to SN United  
9 Enterprises, Inc. He then offered the company for sale as a publicly traded shell.

10 94. On or about May 24, 2006, Stocker, as the sole principal of Carrera  
11 Capital, offered and sold the 50,000,000 shares of SN United Enterprises, Inc. held in  
12 the name of Carrera Capital to a third party (Gary Whiting) for \$150,000. Stocker and  
13 Carrera obtained the \$150,000 for these shares by means of the untrue statement that the  
14 company was the successor to the publicly traded company, Accel Old.

15 **E. Stocker Engaged in Securities Fraud By Creating a New Corporation,**  
16 **Access Developers, Inc., which Fraudulently Assumed the Identity of**  
17 **an Existing Inactive Shell, Royal Alliance Ventures Corporation.**

18 95. Upon information and belief, Stocker knew in April 2006 that a public  
19 company named Access Developers, Inc. had been previously incorporated in the State  
20 of Florida, that the company's shares had been publicly traded in the over-the-counter  
21 market under the trading symbol "AONE" with CUSIP number 00431D100, and that  
22 the company's shares were no longer actively trading. This pre-existing public  
23 company is referred to in this complaint as "Access Old."

24 96. With knowledge of the pre-existing company, Stocker incorporated a new  
25 company with the same name, Access Developers, Inc., with the State of Florida. He  
26 signed a certificate of incorporation and, using the means of interstate commerce or the  
27 mails, caused the certificate to be filed with the State of Florida on April 20, 2006.  
28 This new company is referred to in this complaint as "Access New."

1           97.    Stocker was the sole director of Access New.

2           98.    On or about May 25, 2006, Stocker and Carrera Capital entered into a  
3 Stock Purchase Agreement with Antal (Tony) Markus to sell 50,000,000 shares of  
4 Royal Alliance Ventures Corporation in exchange for money, the amount of which is  
5 unknown. As a result of this transaction, Markus was appointed as an officer and  
6 director of Royal Alliance Ventures Corporation.

7           99.    At the direction of Stocker, Markus signed a Unanimous Written Consent  
8 of Board of Directors and Majority Shareholder in Lieu of Special Meeting (Access  
9 Consent) as of May 25, 2008, authorizing the corporation to change its name from  
10 Access Developers, Inc. to Royal Alliance Ventures Corp. and to conduct a 1 share for  
11 1,000 share reverse split of its common stock to be effective June 12, 2006.

12           100.   At the direction of Stocker, Markus, acting as the president of Access  
13 New, filed an amendment to the Articles of Incorporation for Access Developers, Inc.  
14 with the State of Florida on May 30, 2006, changing the name of the company to Royal  
15 Alliance Ventures Corporation.

16           101.   On June 1, 2006, Stocker obtained a CUSIP number for Royal Alliance  
17 Ventures Corporation.

18           102.   On June 2, 2006, Stocker sent a letter to The Nasdaq Stock Market, Inc.  
19 and subsequently to Manhattan Transfer, in which he falsely represented that Access  
20 Developers, Inc., which had traded under the symbol "AONE" with CUSIP number  
21 00431D100, was changing its name to Royal Alliance Ventures Corporation and  
22 conducting a reverse split of 1 share for 1,000 shares on the proposed effective date of  
23 June 12, 2006. He also represented that shareholder approval had been obtained and  
24 submitted a copy of the Access Consent.

25           103.   Stocker's statements to The Nasdaq Stock Market, Inc. and Manhattan  
26 Transfer in the June 2, 2006 letter were false and misleading. Access New had never  
27 traded under the symbol "AONE." The common stock of Access Old had been  
28 assigned the unique CUSIP number 00431D100 rather than the common stock of

1 Access New. Stocker omitted to disclose the material fact that Access New and Access  
2 Old, while sharing the same name, were different entities. He omitted to disclose that  
3 he and Markus were not officers or directors, and Carrera Capital was not a shareholder  
4 of Access Old on June 2, 2006. He misrepresented that the Access Consent was from  
5 the shareholders of Access Old. He did not possess a board of directors' resolution and  
6 shareholder consent from Access Old. In fact, Access Old had not authorized a name  
7 change or reverse split.

8 104. Stocker knew that his statements to The Nasdaq Market, Inc. and  
9 Manhattan Transfer in the June 2, 2006 letter were untrue and that he had omitted  
10 material facts necessary to make the statements he had made not misleading. He knew  
11 from his participation in the incorporation of Access New on April 20, 2006, that he  
12 was the director of Access New rather than the pre-existing company known as Access  
13 Old. Stocker knew at the time he wrote the June 2, 2006 letter that Access New, the  
14 entity that he had incorporated on April 20, 2006, had never traded under the symbol  
15 "AONE" with CUSIP number 00431D100. He also knew that Access New was the  
16 entity changing its name and offering to sell shares under the guise of a reverse split  
17 rather than Access Old as he represented to Manhattan Transfer and The Nasdaq  
18 Market, Inc. He knew that Carrera Capital did not own any shares of Access Old or  
19 Access New on June 2, 2006.

20 105. Based on Stocker's June 2, 2006 letter, The Nasdaq Stock Market, Inc.  
21 posted an announcement on its Daily List on June 9, 2006, that Access Old was  
22 changing its name to Royal Alliance Ventures Corporation and conducting a 1 for 1,000  
23 reverse split. The Daily List was republished on the Internet at  
24 <http://www.otcbb.com/dailylist> .

25 106. On or about June 6, 2006, Manhattan Transfer was retained to serve as the  
26 transfer agent for Royal Alliance Ventures Corporation and provide transfer services  
27 including the issuance and transfer of new stock certificates.

28

1           107. Stocker caused Manhattan Transfer to submit a Transfer Agent  
2 Verification Form to The Nasdaq Stock Market, Inc. and the Depository Trust &  
3 Clearing Corporation on June 6, 2006, that falsely represented that Access Old, with  
4 CUSIP number 00431D100, was changing its name to Royal Alliance Ventures  
5 Corporation effective June 12, 2006, and conducting a reverse split to reduce its  
6 outstanding shares from 75,000,000 to 75,000. Manhattan Transfer's communication  
7 with the Depository Trust & Clearing Company was in effect an offer by Stocker and  
8 Carrera Capital to purchase the Access Old shares it held on behalf of public  
9 shareholders in exchange for new shares in Royal Alliance Ventures Corporation.

10           108. In response to Stocker's offer, the Depository Trust & Clearing Company  
11 and other shareholders sent on June 14, 2006 and the following days, by means of  
12 interstate commerce, the share certificates for at least 17,319,252 shares of Access Old  
13 to Manhattan Transfer to be exchanged for at least 17,354 shares of Royal Alliance  
14 Ventures Corporation. These transactions constituted sales of securities, in that a  
15 security of one company was exchanged for a security of another company.

16           109. Stocker obtained property, the 17,319,252 shares of Access Old from the  
17 Depository Trust & Clearing Company and other shareholders, by means of untrue  
18 statements that Access Old was changing its name to Royal Alliance Ventures  
19 Corporation and conducting a 1 share for 1,000 share reverse split.

20           110. Stocker's transaction, practice, and course of business in creating a new  
21 corporation with the same name as Access Old, and fraudulently taking over the identity  
22 of the pre-existing company, operated as a fraud or deceit upon the Depository Trust &  
23 Clearing Company and other shareholders, because they exchanged their shares of  
24 Access Old for shares of Royal Alliance Ventures Corporation under the false belief  
25 that they were receiving shares in the same company when in fact they were receiving  
26 shares in a new and unrelated company.

27           111. On or about June 12, 2006, Markus, as the director of Royal Alliance  
28 Ventures Corporation, instructed Manhattan Transfer to issue 50,000,000 shares of

1 Royal Alliance Ventures Corporation to Carrera Capital in the form of stock certificate  
2 #1004. After this transaction, Carrera Capital owned over 99 percent of the shares of  
3 Royal Alliance Ventures Corporation.

4 112. Through the actions described above, Stocker created the false appearance  
5 that he had taken over Access Old, and changed its name to Royal Alliance Ventures  
6 Corporation. He then delivered the stock certificate #1004 to Markus or his agent as  
7 part of a Stock Purchase Agreement.

8 113. On or about July 11, 2006, Stocker reported to Manhattan Transfer that  
9 Markus had not fully paid Carrera Capital for the 50,000,000 shares of Royal Alliance  
10 and counsel for Markus refused to return the stock certificate #1004. Stocker, acting as  
11 a director of Royal Alliance and president of Carrera Capital, submitted a second  
12 Unanimous Written Consent of Board of Directors and Majority Shareholder in Lieu of  
13 Special Meeting (Second Access Consent) to Manhattan Transfer directing it to place a  
14 hold on stock certificate #1004 and replace it with a new certificate. Manhattan Transfer  
15 issued new stock certificate #1015 for 50,000,000 shares of Royal Alliance to Carrera  
16 Capital and delivered it to Stocker in Phoenix, Arizona.

17 114. Upon information and belief, on or about July 21, 2006, Stocker and  
18 Carrera Capital offered and sold the 50,000,000 shares of Royal Alliance to two third-  
19 parties (Griffdom and Testre) and received in exchange two wire transfers of \$75,000  
20 each into Stocker's IOLTA Trust Account at BNC Bank. Stocker then wrote a check  
21 for \$150,000 drawn on that account payable to Carrera Capital and noted on the check  
22 that it was for "RYAV," which was the trading symbol for Royal Alliance.

23 **F. Stocker Engaged in Securities Fraud By Creating a New Corporation,**  
24 **Medivisor Marketing, Inc., which Fraudulently Assumed the Identity**  
25 **of an Existing Inactive Shell, Chemtrak, Inc.**

26 115. Upon information and belief, Stocker knew in April 2006 that a public  
27 company named Chemtrak, Inc. had been previously incorporated in the State of  
28 Delaware, that the company's shares had been publicly traded in the over-the-counter

1 market under the trading symbol “CMTR” with CUSIP number 163877202, and that the  
2 company’s shares were no longer actively trading. This pre-existing public company is  
3 referred to in this complaint as “Chemtrak Old.”

4 116. With knowledge of the pre-existing company, Stocker incorporated a new  
5 company with the same name, Chemtrak, Inc., with the State of Delaware. He signed a  
6 certificate of incorporation and, using the means of interstate commerce or the mails,  
7 caused the certificate to be filed with the State of Delaware on April 21, 2006. This  
8 new company is referred to in this complaint as “Chemtrak New.”

9 117. Stocker was the incorporator of Chemtrak New.

10 118. On or about May 1, 2006, Stocker entered into an agreement to sell  
11 Chemtrak, Inc. to Candido Luzzi in exchange for at least \$30,000. Stocker  
12 misrepresented that Chemtrak New had formerly traded under the symbol “CMTR” and  
13 had approximately 3,500,000 shares outstanding. .

14 119. At the direction of Stocker, Luzzi filed a Certificate of Amendment of  
15 Certificate of Incorporation for Chemtrak, Inc. with the State of Delaware on May 1,  
16 2006, changing the name of the company to Medivisor Marketing, Inc.

17 120. On May 3, 2006, Stocker obtained a new CUSIP number for Medivisor  
18 Marketing, Inc.

19 121. On May 3, 2006, Stocker sent a letter to The Nasdaq Stock Market, Inc.,  
20 with a copy to Manhattan Transfer, in which he falsely represented that Chemtrak, Inc.,  
21 which had traded under the symbol “CMTR” with CUSIP number 163877202, was  
22 changing its name to Medivisor Marketing, Inc. and conducting a reverse split of 1  
23 share for 100 shares on the proposed effective date of May 15, 2006.

24 122. Stocker’s statements to The Nasdaq Stock Market, Inc. and Manhattan  
25 Transfer in the May 3, 2006 letter were false and misleading. Chemtrak New had never  
26 traded under the symbol “CMTR.” The common stock of Chemtrak Old had been  
27 assigned the unique CUSIP number 163877202. Stocker omitted to disclose the  
28 material fact that Chemtrak New and Chemtrak Old, while sharing the same name, were

1 different entities. He omitted to disclose that he and Luzzi were not officers or directors  
2 of Chemtrak Old on May 3, 2006. He did not possess a name change amendment from  
3 the board of directors of Chemtrak Old. In fact, Chemtrak Old had not authorized a  
4 name change or reverse split

5 123. Stocker knew that his statements to The Nasdaq Market, Inc. and  
6 Manhattan Transfer in the May 3, 2006 letter were untrue and that he had omitted  
7 material facts necessary to make the statements he had made not misleading. He knew  
8 from his participation in the incorporation of Chemtrak New on April 21, 2006, that he  
9 was the incorporator and Luzzi was the director of Chemtrak New rather than the pre-  
10 existing company known as Chemtrak Old. Stocker knew that Chemtrak New, the  
11 entity that he had incorporated on April 21, 2006, had never traded under the symbol  
12 "CMTR" with CUSIP number 163877202. He also knew that Chemtrak New was the  
13 entity changing its name and offering to sell shares under the guise of a reverse split  
14 rather than Chemtrak Old as he represented to Manhattan Transfer and The Nasdaq  
15 Market, Inc.

16 124. Based on Stocker's May 3, 2006 letter, The Nasdaq Stock Market, Inc.  
17 posted an announcement on its Daily List on May 15, 2006, that Chemtrak Old was  
18 changing its name to Medivisor Marketing, Inc. and conducting a 1 for 100 reverse  
19 split. The Daily List was republished on the Internet at <http://www.otcbb.com/dailylist> .

20 125. At the direction of Stocker, Luzzi contracted with Manhattan Transfer to  
21 serve as the transfer agent for Medivisor Marketing, Inc. and provide transfer services  
22 including the issuance and transfer of new stock certificates.

23 126. Stocker caused Manhattan Transfer to submit a Transfer Agent  
24 Verification Form to The Nasdaq Stock Market, Inc. and the Depository Trust &  
25 Clearing Corporation on May 4, 2006, that falsely represented that Chemtrak Old, with  
26 CUSIP number 163877202, was changing its name to Medivisor Marketing, Inc. on  
27 May 15, and conducting a reverse split to reduce its outstanding shares from 3,500,000  
28 to 3,000. Manhattan Transfer's communication with the Depository Trust & Clearing

1 Company was in effect an offer by Stocker and Carrera Capital to purchase the shares of  
2 Chemtrak Old held by The Depository Trust & Clearing Corporation on behalf of  
3 various public shareholders in exchange for new shares in Medivisor Marketing, Inc.

4 127. In response to Stocker's offer, the Depository Trust & Clearing Company  
5 and other shareholders sent on May 19, 2006, by means of interstate commerce, the  
6 share certificates for at least 3,750,252 shares of Chemtrak Old to Manhattan Transfer  
7 to be exchanged for at least 37,510 shares of Medivisor Marketing, Inc. These  
8 transactions constituted sales of securities, in that a security of one company was  
9 exchanged for a security of another company.

10 128. Stocker obtained property, the 3,750,252 shares of Chemtrak Old from the  
11 Depository Trust & Clearing Company and other shareholders, by means of untrue  
12 statements that Chemtrak Old was changing its name to Medivisor Marketing, Inc. and  
13 conducting a 1 share for 100 share reverse split.

14 129. Stocker's transaction, practice, and course of business in creating a new  
15 corporation with the same name as Chemtrak Old, and fraudulently taking over the  
16 identity of the pre-existing company, operated as a fraud or deceit upon the Depository  
17 Trust & Clearing Company and other shareholders, because they exchanged their shares  
18 of Chemtrak Old for shares of Medivisor Marketing, Inc. under the false belief that they  
19 were receiving shares in the same company when in fact they were receiving shares in a  
20 new and unrelated company.

21 130. On May 16, 2006, Luzzi caused Medivisor Inc. to pay to Stocker at least  
22 \$30,000 for the purchase of Chemtrak, Inc.

23 131. At Stocker's direction, Luzzi instructed Manhattan to issue 20,000,000  
24 shares of Medivisor Marketing, Inc. to Luzzi on May 23, 2006.

25 132. In August 2006, Luzzi requested that Stocker reverse the previous  
26 transaction, by changing the name of Medivisor Marketing, Inc. back to Chemtrak, Inc.

27  
28

1           **G.     Stocker Engaged in Securities Fraud By Creating a New Corporation,**  
2           **Trendsetter Solar Products, Inc., which Fraudulently Assumed the**  
3           **Identity of an Existing Inactive Shell, Computer Communications,**  
4           **Inc.**

5           133. Upon information and belief, Stocker knew in April 2006 that a public  
6 company named Computer Communications, Inc. had been previously incorporated in  
7 the State of Nevada, that the company's shares had been publicly traded in the over-the-  
8 counter market under the trading symbol "CCMM" with CUSIP number 204885107,  
9 and that the company's shares were no longer actively trading. This pre-existing public  
10 company is referred to in this complaint as "Computer Communications Old."

11           134. With knowledge of the pre-existing company, Stocker incorporated a new  
12 company with the same name, Computer Communications, Inc., with the State of  
13 Nevada. He signed a certificate of incorporation and, using the means of interstate  
14 commerce or the mails, caused the certificate to be filed with the State of Nevada on  
15 April 21, 2006. This new company is referred to in this complaint as "Computer  
16 Communications New."

17           135. Stocker was the incorporator of Computer Communications New.

18           136. On or about May 31, 2006, Stocker entered into an agreement to sell  
19 Computer Communications, Inc. to James Holmes in exchange for an unknown amount  
20 of consideration.

21           137. At the direction of Stocker, Holmes filed a Certificate of Amendment for  
22 Computer Communications, Inc. with the State of Nevada on May 31, 2006, changing  
23 the name of the company to Trendsetter Solar Products, Inc.

24           138. At the direction of Stocker, Holmes signed a Unanimous Written Consent  
25 of the Board of Directors and Majority Shareholder in Lieu of Special Meeting  
26 (Computer Consent) that changed the name of Computer Communications Inc. to  
27 Trendsetter Solar Products, Inc., and authorized the company to conduct a 1 share for  
28 1,000 share reverse split of its common stock.

1           139. On June 2, 2006, Stocker sent a letter to The Nasdaq Stock Market, Inc.,  
2 with a copy to Manhattan Transfer, in which he falsely represented that Computer  
3 Communications, Inc., which had traded under the symbol "CCMM" with CUSIP  
4 number 204885107, was changing its name to Trendsetter Solar Products, Inc. and  
5 conducting a reverse split of 1 share for 1,000 shares on the proposed effective date of  
6 May 15, 2006. He submitted a copy of the Computer Consent with his letter.

7           140. Stocker's statements to The Nasdaq Stock Market, Inc. and Manhattan  
8 Transfer in the June 2, 2006 letter were false and misleading. Computer  
9 Communications New had never traded under the symbol "CCMM." The common  
10 stock of Computer Communications Old had been assigned the unique CUSIP number  
11 204885107. Stocker omitted to disclose the material fact that Computer  
12 Communications New and Computer Communications Old, while sharing the same  
13 name, were different entities. He omitted to disclose that he and Holmes were not  
14 officers or directors of Computer Communications Old. He misrepresented that the  
15 Computer Consent was from the shareholders of Computer Communications Old.

16           141. Stocker knew that his statements to The Nasdaq Market, Inc. and  
17 Manhattan Transfer in the June 2, 2006 letter were untrue and that he had omitted  
18 material facts necessary to make the statements he had made not misleading. He knew  
19 from his participation in the incorporation of Computer Communications New on April  
20 21, 2006, that he was the incorporator, and Holmes was the director of Computer  
21 Communications New rather than the pre-existing company known as Computer  
22 Communications Old. Stocker knew that Computer Communications New had never  
23 traded under the symbol "CCMM" with CUSIP number 204885107. Rather than  
24 symbol and CUSIP number had been assigned to Computer Communications Old, the  
25 pre-existing company. He also knew that Computer Communications New was the  
26 entity changing its name and offering to sell shares under the guise of a reverse split,  
27 rather than Computer Communications Old as he represented in the letter to Manhattan  
28 Transfer and The Nasdaq Market, Inc. He did not possess a name change amendment

1 from the board of directors of Computer Communications Old. Instead, he submitted  
2 the Computer Consent signed by Holmes as the director of Computer Communications  
3 New.

4 142. Based on Stocker's June 2, 2006 letter, The Nasdaq Stock Market, Inc.  
5 posted an announcement on its Daily List on June 9, 2006, that Computer  
6 Communications Old was changing its name to Trendsetter Solar Products, Inc. and  
7 conducting a 1 for 1,000 reverse split. The Daily List was republished on the Internet at  
8 <http://www.otcbb.com/dailylist> .

9 143. At the direction of Stocker, Holmes contracted with Manhattan Transfer to  
10 serve as the transfer agent for Trendsetter Solar Products, Inc. and provide transfer  
11 services including the issuance and transfer of new stock certificates.

12 144. Stocker caused Manhattan Transfer to submit a Transfer Agent  
13 Verification Form to The Nasdaq Stock Market, Inc. and the Depository Trust &  
14 Clearing Corporation on June 6, 2006, that falsely represented that Computer  
15 Communications Old, with CUSIP number 204885107, was changing its name to  
16 Trendsetter Solar Products, Inc. on June 12, 2006, and conducting a reverse split to  
17 reduce its outstanding shares from 25,000,000 to 25,000. Manhattan Transfer's  
18 communication with the Depository Trust & Clearing Company was in effect an offer  
19 by Stocker and Carrera Capital to purchase the shares of Computer Communications  
20 Old that the Depository Trust & Clearing Corporation held on behalf of various public  
21 shareholders in exchange for new shares in Trendsetter Solar Products, Inc.

22 145. In response to Stocker's offer, the Depository Trust & Clearing Company  
23 and other shareholders sent on June 22, 2006, by means of interstate commerce, the  
24 share certificates for at least 5,544,643 shares of Computer Communications Old to  
25 Manhattan Transfer to be exchanged for at least 5,544 shares of Trendsetter Solar  
26 Products, Inc. These transactions constituted sales of securities, in that a security of one  
27 company was exchanged for a security of another company.

28

1           146. Stocker obtained property, the 5,544,643 shares of Computer  
2 Communications Old from the Depository Trust & Clearing Company and other  
3 shareholders, by means of untrue statements that 5,544,643 shares of Computer  
4 Communications Old was changing its name to Trendsetter Solar Products, Inc. and  
5 conducting a 1 share for 1,000 share reverse split.

6           147. Stocker's transaction, practice, and course of business in creating a new  
7 corporation with the same name as 5,544,643 shares of Computer Communications Old,  
8 and fraudulently taking over the identity of the pre-existing company, operated as a  
9 fraud or deceit upon the Depository Trust & Clearing Company and other shareholders,  
10 because they exchanged their shares of 5,544,643 shares of Computer Communications  
11 Old for shares of Trendsetter Solar Products, Inc. under the false belief that they were  
12 receiving shares in the same company when in fact they were receiving shares in a new  
13 and unrelated company.

14           148. Through the actions described above, Stocker created the false appearance  
15 that he had taken over 5,544,643 shares of Computer Communications Old, and  
16 changed its name to Trendsetter Solar Products, Inc.

17           149. Upon information and belief, third parties paid Stocker at least \$25,000  
18 for the purchase of Computer Communications, Inc.

19  
20           **IV. STOCKER AND CARRERA CAPITAL MADE UNREGISTERED  
21 OFFERS AND SALES OF SECURITIES**

22           150. On or about May 4, 2006, Stocker and Carrera Capital, through  
23 communications with Manhattan Transfer, offered and sold 1,075 shares of Ergonomic  
24 Enterprises to the Depository Trust & Clearing Company in exchange for receipt of  
25 107,313 shares of Avalon Stores Old.

26           151. On or about June 13, 2006, Stocker, and Carrera Capital offered and sold  
27 50,000,000 shares of Ergonomic Enterprises to a third party (Milligan or Testre) in  
28 exchange for \$150,000.

1           152. On June 13, 2006, payment of the \$150,000 was sent by wire transfer  
2 through interstate commerce to the bank account David B. Stocker Ltd. at BNC  
3 National Bank rather than to the account of Carrera Capital.

4           153. On or about May 4, 2006, Stocker and Carrera Capital, through  
5 communications with Manhattan Transfer, offered and sold at least 29,026 shares of  
6 Viking Consolidated, Inc. to the Depository Trust & Clearing Company and other  
7 shareholders in exchange for receipt of at least 2,872,784 shares of Westmark Old.

8           154. On or about June 13, 2006, Stocker and Carrera Capital offered and sold  
9 50,000,000 shares of Viking Consolidated, Inc. to a third party (Deonarine  
10 Boodoosingh) in exchange for an unknown amount of money or property.

11           155. On or about May 1, 2006, Stocker and Carrera Capital, through  
12 communications with Manhattan Transfer, offered and sold at least 23,794 shares of  
13 MMT Resources, Inc. to the Depository Trust & Clearing Company and other  
14 shareholders in exchange for receipt of at least 2,379,433 shares of Electronic  
15 Transmission Old.

16           156. On or about May 1, 2006, Stocker and Carrera Capital, through  
17 communications with Manhattan Transfer, offered and sold at least 80,080 shares of SN  
18 United Enterprises, Inc. to the Depository Trust & Clearing Company and other  
19 shareholders in exchange for receipt of at least 8,006,019 shares of Accel Old .

20           157. On or about May 24, 2006, Stocker and Carrera Capital offered and sold  
21 50,000,000 shares of SN United Enterprises, Inc. to a third party (Gary Whiting) in  
22 exchange for \$150,000.

23           158. On or about June 12, 2006, Stocker and Carrera Capital, through  
24 communications with Manhattan Transfer, offered and sold at least 17,354 shares of  
25 Royal Alliance Ventures Corporation to the Depository Trust & Clearing Company and  
26 other shareholders in exchange for receipt of at least 17,319,252 shares of Access Old .

27           159. On or about May 25, 2006, Stocker, acting as the president of Carrera  
28 Capital, and Carrera Capital entered into a Stock Purchase Agreement to offer and sell

1 50,000,000 shares of Access Old to Markus in exchange for money or other  
2 consideration.

3 160. After changing the name of Access Old to Royal Alliance Ventures  
4 Corporation, Markus at the direction of Stocker issued 50,000,000 shares of Royal  
5 Alliance to Carrera Capital in the form of stock certificate #1004. Stocker then  
6 delivered the stock certificate to Markus

7 161. When Markus failed to pay the full consideration for the shares of Royal  
8 Alliance Ventures Corporation, Stocker rescinded the transaction, cancelled the  
9 previously issued stock certificate #1004, and directed Manhattan Transfer to issue a  
10 replacement certificate #1015 to Carrera Capital.

11 162. On or about July 21, 2006, Stocker and Carrera Capital offered and sold  
12 the 50,000,000 shares of Royal Alliance Ventures Corporation to two third-parties in  
13 exchange for \$150,000, which funds were paid to Stocker's IOLTA bank account at  
14 BNC Bank by wire transfer.

15 163. Carrera Capital owned shares of Ergonomic Enterprises, Viking  
16 Consolidated, Inc., SN United Enterprises, Inc., MMT Resources, Inc., and Royal  
17 Alliance Ventures Corporation, which it offered and sold when no registration statement  
18 was on file or in effect with the Commission for these transactions.

19 164. Stocker, as the sole officer, director, and principal of Carrera Capital, was  
20 a necessary participant in the offer and sale of the shares of these five companies owned  
21 by Carrera Capital. He negotiated the terms of the sales, delivered the certificates, and  
22 signed the corporate resolutions authorizing the sale. No registration statement was on  
23 file or in effect with the Commission for these transactions by Stocker.

24 165. During May 2006, Stocker, through communications with Manhattan  
25 Transfer, offered and sold at least 37,510 shares of Medivisor Marketing, Inc. to the  
26 Depository Trust & Clearing Company and other shareholders in exchange for receipt  
27 of at least 3,750,252 shares of Chemtrak Old.

28







1 **PRAYER FOR RELIEF**

2 WHEREFORE, the Commission respectfully request that the Court:

3 **I.**

4 Find that the defendants committed the violations alleged.

5 **II.**

6 Enter an Order of Permanent Injunction as to each defendant, in a form  
7 consistent with Rule 65(d) of the Federal Rules of Civil Procedure, enjoining each  
8 defendant from further violations of the provisions of law and rules alleged in this  
9 complaint.

10 **III.**

11 Enter an Order requiring the defendants to prepare an accounting of the proceeds  
12 they obtained from the unlawful transactions and activities described above. .

13 **IV.**

14 Enter an Order requiring defendants to disgorge all ill-gotten gains resulting from  
15 their participation in the conduct described above, including pre-judgment, and post  
16 judgment interest.

17 **V.**

18 Enter an Order requiring each defendants to pay third-tier civil penalties pursuant  
19 to Section 20(d) of the Securities Act and Section 21(d)(3) of the Exchange Act, 15  
20 U.S.C. §§ 77t(d) and 78u(d)(3).

21 **VI.**

22 Enter an Order barring all defendants from participating in any offering of penny  
23 stock pursuant to Section 20(g) of the Securities Act and Section 21 of the Exchange  
24 Act, 15 U.S.C. §§ 77t(g) and 78u(d)(6).  
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**VII.**

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

DATED this 11th day of August, 2008.

Respectfully submitted,

s/ Leslie J. Hughes  
\_\_\_\_\_  
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