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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

CARLOS EDUARDO REYES ALVAREZ,

Defendant.

COMPLAINT

23 Civ. _____ ()

ECF CASE

JURY TRIAL DEMANDED

Plaintiff, Securities and Exchange Commission (“Commission”), for its Complaint against Defendant Carlos Eduardo Reyes Alvarez (“Reyes”), alleges as follows:

SUMMARY OF ALLEGATIONS

1. Beginning in about November 2017 and continuing through at least April 2019, Reyes engaged in numerous fraudulent schemes involving the securities of at least 28 microcap companies.

2. On at least 50 occasions, Reyes acquired large positions in thinly-traded over-the-counter (“OTC”) stocks and then generated investor interest in these stocks through fraudulent means, most often by causing the issuance of press releases that had not been authorized by the companies.

3. In connection with at least four companies, Reyes engaged in wash trading to create the appearance of an active market and move up the company’s stock price.

4. Reyes’s fraudulent activity increased the price of the securities he targeted, and he profited from these schemes by selling the securities after these fraud-induced price increases. By means of these schemes, Reyes obtained ill-gotten profits of approximately \$387,000.

VIOLATIONS

5. By virtue of the conduct alleged herein, Defendant, directly or indirectly, has violated Section 17(a) of the Securities Act of 1933 (“Securities Act”) [15 U.S.C. § 77q(a)]; and Sections 9(a)(1), 9(a)(2), and 10(b) of the Securities Exchange Act of 1934 (“Exchange Act”) [15 U.S.C. §§ 78i(a)(1), 78i(a)(2), and 78j(b)], and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5].

6. Unless Defendant is restrained and enjoined, he will engage in the acts, practices, transactions, and courses of business set forth in this Complaint, or in acts, practices, transactions and courses of business of similar type and object.

NATURE OF THE PROCEEDINGS AND RELIEF SOUGHT

7. The Commission brings this action pursuant to the authority conferred upon it by Securities Act Sections 20(b) and (d) [15 U.S.C. §§ 77t(b) and (d)], and Exchange Act Section 21(d) [15 U.S.C. § 78u(d)].

8. The Commission seeks a final judgment: (a) permanently restraining and enjoining Defendant from violating the federal securities laws and rules this Complaint alleges he has violated; (b) ordering Defendant to disgorge all ill-gotten gains he received as a result of the violations alleged here and to pay prejudgment interest thereon pursuant to Exchange Act Sections 21(d)(3), 21(d)(5) and 21(d)(7) [15 U.S.C. §§ 78u(d)(3), 78u(d)(5) and 78u(d)(7)]; (c) ordering Defendant to pay civil money penalties pursuant to Securities Act Section 20(d) [15 U.S.C. § 77t(d)] and Exchange Act Section 21(d)(3) [15 U.S.C. § 78u(d)(3)]; (d) permanently prohibiting Reyes from serving as an officer or director of any company that has a class of securities registered under Exchange Act Section 12 [15 U.S.C. § 78l] or that is required to file reports under Exchange Act Section 15(d) [15 U.S.C. § 78o(d)], pursuant to Securities Act Section 20(e) [15 U.S.C. § 77t(e)] and Exchange Act Section 21(d) of the Exchange Act [15 U.S.C. § 78u(d)(2)]; (e) permanently prohibiting Reyes from participating in any offering of a penny stock, pursuant to Securities Act Section 20(g) [15 U.S.C. § 77t(g)] and Exchange Act Section 21(d)(6) [15 U.S.C. § 78u(d)(6)]; (f) enjoining Defendant from engaging in any activity for the purpose of inducing or attempting to induce the purchase or sale of any security; causing any person or entity to engage in any activity for the purpose of inducing or attempting to induce the purchase or sale of any security; or deriving compensation from any activity engaged in for the purpose of inducing or attempting to induce the purchase or sale of any security, pursuant to Exchange Act Section 21(d)(5) [15 U.S.C. § 78u(d)(5)], unless that security is: (i) listed on a

national securities exchange; and (ii) has had a market capitalization of at least \$50,000,000 for 90 consecutive days; and (g) ordering any other and further relief that the Court may deem just and proper.

JURISDICTION AND VENUE

9. This Court has jurisdiction over this action pursuant to Securities Act Section 22(a) [15 U.S.C. § 77v(a)] and Exchange Act Section 27 [15 U.S.C. §78aa].

10. Defendant, directly and indirectly, has made use of the means or instrumentalities of interstate commerce or of the mails in connection with the transactions, acts, practices, and courses of business alleged herein.

11. Venue lies in this district pursuant to Securities Act Section 22(a) [15 U.S.C. § 77v(a)] and Exchange Act Section 27 [15 U.S.C. § 78aa]. Certain of the acts, practices, transactions and courses of business alleged in this Complaint occurred within the Southern District of New York, and were affected, directly or indirectly, by making use of means or instrumentalities of transportation or communication in interstate commerce, or the mails. Among other things, Reyes distributed fraudulent press releases to one or more entities located in this district, and at all relevant times Reyes traded securities via an alternative trading system based in this district.

DEFENDANT

12. Reyes, born in 1988, is a resident of Port Saint Lucie, Florida.

FACTS

13. Reyes engaged in two types of schemes. The first type was a “pump-and dump” scheme wherein Reyes, sometimes within a matter of days, purchased shares of a thinly-traded stock, caused a newswire service to put out a press release concerning the issuer, and then sold

all the shares he had just bought at a profit.

14. In the second type of scheme, Reyes engaged in wash trading to move up the share price of an OTC issuer. While engaged in this trading, Reyes would also buy and sell additional shares as the price increased.

I. THE PUMP-AND-DUMP SCHEMES

A. Overview

15. On at least 50 occasions from late 2017 through about April 2019, involving the stock of 25 companies, Reyes engaged in a pump-and-dump scheme.

16. On all 50 occasions, Reyes (i) acquired shares of a microcap issuer; (ii) caused a press release, appearing to originate from the issuer, to be submitted to a newswire service for dissemination, and after the press release was issued, the microcap issuer's stock price and trading volume increased; and (iii) immediately sold his shares for a profit.

17. For his scheme, Reyes consistently identified thinly-traded stocks of issuers that were not traded on an exchange, were financially precarious, and on occasion were dormant or defunct. These characteristics made it easier for Reyes to manipulate the stock price and generate investor demand, by issuing press releases to generate interest.

18. Initially, Reyes used an account in his own name to purchase shares of the targeted issuer prior to promoting it.

19. After a broker-dealer closed one of Reyes's accounts, Reyes opened accounts that he controlled that were in the names of family and friends to acquire and sell stock. Reyes opened such accounts in the name of his mother-in-law, stepfather, wife, and the brother-in-law of his wife, among others.

20. Thereafter, Reyes used these accounts to engage in each of the pump-and-dump

schemes.

21. Notwithstanding the names on these accounts, the accounts belonged to Reyes and he alone controlled them.

22. In connection with at least four of the pump-and-dump schemes, Reyes purchased websites and email domains in the names of, or with names confusingly similar to the name of, an issuer.

23. He used emails with those domain names to communicate with newswire services about disseminating press releases, as though he were an authorized representative of the issuer.

24. Reyes sometimes used his wife's name to register the misleading websites and domains.

25. In connection with each of the 25 issuers, Reyes, through entities he controlled or other intermediaries, caused one or more press releases to be issued in the name of the issuer.

26. Reyes frequently had no prior relationship with the issuer and merely hijacked the issuer's name for the purposes and duration of his scheme.

27. On at least ten occasions, involving at least nine of the issuers, the newswire service, an internet message board, or the issuer published a notice to disregard the unauthorized press release, soon after the Reyes press release was disseminated.

28. Reyes used at least four different newswire services to forestall these services from associating him with a pattern of unauthorized press releases.

29. In each instance, the trading volume and price of the targeted security rose following Reyes's press releases and touting, and Reyes immediately sold his shares at a profit.

B. Nexus Energy Services, Inc. (“Nexus”)

30. One of the securities Reyes manipulated was the stock of Nexus Energy Services, Inc., which traded under the symbol “IBGR.”

31. On November 28, 2017, Reyes purchased the email domain name nexusenergyservicesinc.com. The company did not have an official web site or email domain.

32. At that time, Nexus was “dark,” having not published any disclosures for approximately 18 months.

33. A few weeks later, on December 18, 2017, accounts controlled by Reyes purchased 18,676,729 Nexus shares for approximately \$26,158.

34. Later that day, after purchasing the Nexus shares, Reyes paid for a newswire service to disseminate a press release he had provided, purporting to be from Nexus.

35. The press release falsely announced: “Nexus Energy Services, Inc. Announces Bitcoin Implementation to its Oil Business.”

36. Reyes deceived the newswire service into distributing the false and unauthorized press release by sending the newswire service an email purporting to be from the CFO of Nexus and coming from an email address Reyes created, with the name of the purported CFO followed by “@nexusenergyservicesinc.com,” the domain name that Reyes created.

37. Unbeknownst to the newswire service, the CFO who supposedly authorized the issuance of the December 18, 2017 press release was no longer employed by the company.

38. After the press release was distributed, the actual CEO of Nexus contacted the newswire service, informing them that the press release had not been authorized and that the person who supposedly authorized the press release had not worked at the company for two years.

39. In the meantime, following the bogus press release, Nexus's stock price rose to an intraday high of \$0.0052 per share, ten times its previous closing price of \$0.0005 per share. The share price at closing was \$0.0025 per share.

40. By the end of the day, Reyes sold all his shares that day for about \$35,852, for a profit of approximately \$9,694 and a one-day gain of more than 37 percent.

41. After the market closed, the newswire service issued a statement, informing the public that they should disregard the December 18, 2017 Nexus press release.

42. On the following day, the closing share price dropped sharply to \$0.0007 per share.

C. Aim Exploration Inc. ("Aim")

43. In the case of Aim, Reyes conducted the scam twice, first in February 2018 and again in March 2018.

44. From February 16, 2018 through February 21, 2018, Reyes accumulated approximately 14.9 million Aim shares, for approximately \$20,988, in a brokerage account he owned that was in the name of a friend.

45. On February 21, Reyes purchased the domain name "aimexxploration.com" with an extra "X" in the name of the domain. AIM's actual website address was www.AIMExploration.com.

46. Later that day, Reyes used an email address he created with the aimexxploration.com domain to communicate with a newswire service, and to pretend that Aim itself was authorizing the issuance of a press release.

47. On February 22, 2018, a newswire service disseminated a press release that Reyes had provided to the service and paid for.

48. The press release, purporting to be from Aim, announced “AIM Exploration Cancels Reverse Split and Initiates Cryptocurrency Coal Coin Project.”

49. After the press release, Aim’s stock price rose to an intraday high of \$0.0023 per share, 1.5 times its previous closing price of \$0.0015 per share.

50. Reyes sold his entire position in Aim stock for approximately \$25,460, a profit of approximately \$4,472, for a gain of more than 21 percent. A couple of hours after the press release was circulated, but after Reyes’s sales, the newswire service issued a statement, saying that it had been informed by Aim that the public should disregard the press release from earlier in the day.

51. Thereafter, the share price fell, closing lower than the closing price on the day before.

52. The following month, Reyes manipulated the stock again, using the same account, in the name of his friend, to accumulate a position of approximately 5.4 million shares, for approximately \$6,469, early in the day on March 15, 2018.

53. At 2:34pm on March 15, 2018, a newswire service disseminated a press release that Reyes had arranged.

54. The press release, purporting to be from Aim, announced “Aim Exploration (AEXE) and U.S. Highland, Inc. Raised \$32M Investment From Kroger.”

55. On that day, Aim’s stock price rose to an intraday high of \$0.0021 per share, 1.75 times its previous close of \$0.0012 per share.

56. By the end of that day, Reyes sold his entire position in Aim stock for approximately \$10,483, a profit of approximately \$4,015, a one-day gain of more than 61 percent.

57. After the market close, the newswire service issued a statement, saying that it had been informed by Aim that the public should disregard the press release from earlier in the day.

D. Total Profit

58. From December 2017 to April 2019, Reyes repeated this scheme—buying shares of an issuer; getting a newswire service to issue a press release, prompting a rise in the stock price; and then immediately dumping his shares for a profit—at least 50 times, manipulating the securities of 25 microcap companies.

59. The 50 iterations of this scheme are summarized in the following chart:

Dates of Press Releases	No. of Press Releases	Issuer / Security Name	Approximate Net Profits
December 13, 2017 - April 4, 2018	11	Com-Gard Inc.	\$23,630
December 18, 2017	1	Nexus Energy Services, Inc.	\$9,744
December 14, 2017 - March 2, 2018	3	TGI Solar Power Group, Inc.	\$7,038
January 5, 2018	1	PMX Communities, Inc.	\$7,599
January 8, 2018	1	ERHC Energy Inc.	\$8,000
January 9, 2018	1	Golden Matrix Group, Inc.	\$13,715
January 9, 2018 - January 10, 2018	2	Elayaway, Inc.	\$8,122
January 11, 2018	1	Discovery Minerals Ltd.	\$10,837
January 12, 2018	1	Strategic Asset Leasing Inc.	\$9,589

Dates of Press Releases	No. of Press Releases	Issuer / Security Name	Approximate Net Profits
January 16, 2018	1	Embarr Downs, Inc.	\$9,843
January 17, 2018	1	Arcis Resources Corp.	\$953
January 17, 2018	1	Turbodyne Technologies Inc.	\$4,215
January 25, 2018	1	Falconridge Oil Technologies Corp.	\$5,043
January 25, 2018	1	PTA Holdings, Inc.	\$18,710
January 26, 2018	1	Dakshidin Corp.	\$10,262
February 20, 2018 - March 28, 2018	7	Quantum Medical Transport, aka A Clean Slate, Inc.	\$23,906
February 22, 2018 - March 15, 2018	2	AIM Exploration, Inc.	\$8,487
March 8, 2018	1	HPIL Holding	\$14,820
April 2, 2018	1	Tonner-One World Holdings, Inc.	\$9,506
April 18, 2018	2	Neuro-Hitech, Inc.	\$15,110
May 30, 2018	1	Bemax Inc.	\$22,754
July 17, 2018 - August 9, 2018	5	SOHM Inc.	\$12,149
April 3, 2019	1	AVEW Holdings Inc.	\$2,833
April 4, 2019	1	Dutch Gold Resources, Inc.	\$3,355
April 9, 2019	1	Southcore Capital, Inc.	\$9,879
	TOTAL: 50		TOTAL: \$270,099

60. Reyes's total profit from these schemes was approximately \$270,099.

II. THE WASH TRADING SCHEMES

A. Overview

61. With respect to at least four issuers, Reyes used accounts under his control to engage in wash trading.

62. A “wash trade” is an order to buy or sell securities resulting in no change of beneficial ownership for the purpose of (1) creating a false or misleading appearance of active trading in any publicly traded security; or (2) creating false or misleading appearance with respect to the market for any such security.

63. Reyes used at least nine accounts he controlled for wash trading, including accounts in the name of his wife, mother-in-law and friends.

64. While engaging in wash trades, Reyes also purchased additional shares in the manipulated stocks while the price was still low, and then sold those shares after he had manipulated the price higher.

B. Dana Resources (“Dana”)

65. An example of this type of scheme involved the securities of Dana Resources (ticker symbol: DANR), and occurred over the course of two days in August 2018.

66. On August 9 and 10, 2018, using two accounts he controlled, one in the name of his stepfather and one in the name of friends, Reyes engaged in more than 50 wash trades.

67. In each instance Reyes simultaneously bought a specific number of shares in one of these accounts and sold the same amount of shares in the other account.

68. Reyes entered each buy order from one account within a few minutes, and often within seconds, of entering each matching sell order from the other account.

69. On August 9, 2018, by means of the unlawful wash trading, Reyes “walked up”

the share price of Dana stock from \$0.0014 to \$0.0022 per share. At about 12:25pm, Reyes traded over 2.3 million Dana shares between these two accounts at \$0.0014 per share. About 10 minutes later, he traded 400,000 Dana shares between these accounts at \$0.0015 per share. About 20 minutes after that, he traded over a million Dana shares between these accounts at \$0.0017 per share. Several minutes after that, he traded between these accounts at \$0.0019 per share.

70. Reyes continued in this fashion, raising the share price by about one-hundredth of a penny at a time, until about 1:21 pm, when he traded 210,000 Dana shares between these accounts at \$0.0022 per share.

71. Reyes had also purchased additional Dana stock throughout the day, for the purpose of selling after his wash sales had raised the price of the stock.

72. On August 9, 2018, Reyes's trading accounted for about 97% of the trading volume in the market for Dana stock that day. At the end of the day, the two Reyes-controlled accounts held more than 17 million Dana shares.

73. By the end of the day on August 10, 2018, Reyes had sold virtually every Dana share held in his accounts, for a profit from this trading of approximately \$26,044.

C. Total Profit

74. Reyes engaged in wash trading schemes on six occasions from October 2017 to October 2018, manipulating the stock of four microcap issuers.

75. The six iterations of this scheme are summarized in the following chart:

Dates	Issuer / Security Name	Approximate Net Profits
October 19, 2017 – October 2, 2018 (Three instances during this period)	Com-Gard Inc.	\$45,645

Dates	Issuer / Security Name	Approximate Net Profits
March 1, 2018 – March 14, 2018	Tonner-One World Holdings, Inc.	\$41,258
August 9, 2018 – August 10, 2018	Dana Resources	\$26,044
August 14, 2018 – August 15, 2018	Get Fugu, Inc.	\$3,899
		TOTAL: \$116,846

76. Reyes' total profits from the six wash trading schemes totaled approximately \$116,846.

FIRST CLAIM FOR RELIEF

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

77. The Commission re-alleges and incorporates by reference here the allegations contained in paragraphs 1 through 76.

78. Reyes, directly or indirectly, singly or in concert, in connection with the purchase or sale of securities and by the use of means or instrumentalities of interstate commerce, or the mails, or the facilities of a national securities exchange, knowingly or recklessly has: (i) employed one or more devices, schemes, or artifices to defraud, (ii) made one or more untrue statements of a material fact or omitted to state one or more material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading, and/or (iii) engaged in one or more acts, practices, or courses of business which operated or would operate as a fraud or deceit upon any person.

79. By reason of the foregoing, Reyes, directly or indirectly, singly or in concert, violated and, unless enjoined, will again violate Exchange Act Section 10(b) [15 U.S.C. § 78j(b)]

and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5].

SECOND CLAIM FOR RELIEF
Violations of Section 17(a) of the Securities Act

80. The Commission re-alleges and incorporates by reference here the allegations in paragraphs 1 through 76.

81. Reyes, directly or indirectly, singly or in concert, in the offer or sale of securities and by use of the means or instruments of transportation or communication in interstate commerce or the mails: (1) knowingly or recklessly has employed one or more devices, schemes, or artifices to defraud, (2) knowingly, recklessly or negligently has obtained money or property by means of one or more untrue statements of a material fact or omissions of a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, and/or (3) knowingly, recklessly or negligently has engaged in one or more transactions, practices, or courses of business which operated or would operate as a fraud or deceit upon the purchaser.

82. By reason of the foregoing, Reyes, directly or indirectly, singly or in concert, have violated and, unless enjoined, will again violate Securities Act Section 17(a) [15 U.S.C. § 77q(a)].

THIRD CLAIM FOR RELIEF
Violations of Section 9(a)(1) of the Exchange Act

83. The Commission re-alleges and incorporates by reference here the allegations contained in paragraphs 1 through 76.

84. Reyes directly or indirectly, by use of the mails or any means or instrumentality of interstate commerce, or of any facility of any national securities exchange, for the purpose of creating a false or misleading appearance of active trading in any security other than a government security, or a false or misleading appearance with respect to the market for any such

security (A) effected transactions in such security which involved no change in the beneficial ownership thereof, or (B) entered an order or orders for the purchase of such security with the knowledge that an order or orders of substantially the same size, at substantially the same time, and at substantially the same price, for the sale of such security had been or would be entered by or for the same or different parties, or (C) entered any order or orders for the sale of such security with the knowledge that an order or orders of substantially the same size, at substantially the same time, and at substantially the same price, for the purchase of such security had been or would be entered by or for the same or different parties.

85. By reason of the foregoing, Reyes directly or indirectly, singly or in concert, has violated and, unless enjoined, will again violate Exchange Act Section 9(a)(1) [15 U.S.C. § 78i(a)(1)].

FOURTH CLAIM FOR RELIEF
Violations of Section 9(a)(2) of the Exchange Act

86. The Commission re-alleges and incorporates by reference here the allegations contained in paragraphs 1 through 76.

87. Reyes directly or indirectly, by the use of the mails or any means or instrumentality of interstate commerce, or of any facility of any national securities exchange, effected, alone or with one or more other persons, a series of transactions in any security registered on a national securities exchange, or any security not so registered, creating actual or apparent active trading in such security, or raising or depressing the price of such security, for the purpose of inducing the purchase or sale of such security by others.

88. By reason of the foregoing, Reyes directly or indirectly, singly or in concert, has violated and, unless enjoined, will again violate Exchange Act Section 9(a)(2) [15 U.S.C. § 78i(a)(2)].

PRAYER FOR RELIEF

WHEREFORE, the Commission respectfully requests that the Court enter a Final Judgment:

I.

Permanently enjoining Reyes, his agents, servants, employees and attorneys, and those persons in active concert or participation with him, from violating, directly or indirectly, Securities Act Section 17(a) [15 U.S.C. § 77q(a)], Exchange Act Sections 9(a)(1), 9(a)(2), and 10(b) [15 U.S.C. §§ 78i(a)(1), 78i(a)(2), and 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5].

II.

Ordering Reyes to disgorge all ill-gotten gains he received directly or indirectly, with prejudgment interest thereon, as a result of the alleged violations, pursuant to Exchange Act Sections 21(d)(3), 21(d)(5) and 21(d)(7) [15 U.S.C. §§ 78u(d)(3), 78u(d)(5) and 78u(d)(7)].

III.

Ordering Reyes to pay civil monetary penalties under Securities Act Section 20(d) [15 U.S.C. § 77t(d)] and Exchange Act Section 21(d)(3) [15 U.S.C. § 78u(d)(3)].

IV.

Permanently prohibiting Reyes from serving as an officer or director of any company that has a class of securities registered under Exchange Act Section 12 [15 U.S.C. § 78l] or that is required to file reports under Exchange Act Section 15(d) [15 U.S.C. § 78o(d)], pursuant to Securities Act Section 20(e) [15 U.S.C. § 77t(e)] and Exchange Act Section 21(d)(2) [15 U.S.C. § 78u(d)(2)].

V.

Permanently prohibiting Reyes from participating in any offering of a 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, pursuant to Exchange Act Section 21(d)(6) of the Exchange Act [15 U.S.C. § 78u(d)(6)].

VI.

Permanently enjoining Reyes, pursuant to Exchange Act Section 21(d)(5) [15 U.S.C. § 78u(d)(5)], from directly or indirectly: engaging in any activity for the purpose of inducing or attempting to induce the purchase or sale of any security; causing any person or entity to engage in any activity for the purpose of inducing or attempting to induce the purchase or sale of any security; or deriving compensation from any activity engaged in for the purpose of inducing or attempting to induce the purchase or sale of any security; unless that security is: (i) listed on a national securities exchange; and (ii) has had a market capitalization of at least \$50,000,000 for 90 consecutive days; and

VII.

Granting such other and further relief as this Court may deem just and proper.

JURY DEMAND

The Commission demands a trial by jury.

Dated: New York, New York
April 24, 2023

By: /s/ Antonia M. Apps

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