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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON**

	)	
<b>UNITED STATES SECURITIES</b>	)	
<b>AND EXCHANGE COMMISSION,</b>	)	
<b>Plaintiff,</b>	)	<b>CIVIL ACTION</b>
v.	)	<b>FILE NO. CV-08-028-RHW</b>
<b>INTERNATIONAL BROADCASTING</b>	)	<b>COMPLAINT OF PLAINTIFF</b>
<b>CORPORATION</b>	)	<b>U.S. SECURITIES AND</b>
<b>Defendant.</b>	)	<b>EXCHANGE COMMISSION</b>
	)	

**COMPLAINT**

Plaintiff, the United States Securities and Exchange Commission (“SEC”),  
alleges as follows:

**NATURE OF THE ACTION**

1. This matter involves a fraud perpetrated by International Broadcasting  
Corporation, now known as Copper King Mining Corporation (“International

1 Broadcasting”). As part of the fraud, International Broadcasting, through its former  
2 Chief Executive Officer (“CEO”) Daryn P. Fleming (“Fleming”), issued false press  
3 releases about its business operations. In addition, Fleming made false public  
4 statements about the press releases and the company’s business operations on  
5 behalf of International Broadcasting. Finally, International Broadcasting issued a  
6 Form 10-QSB containing material misrepresentations about one of the false press  
7 releases.

8 2. International Broadcasting principally operates in Spokane,  
9 Washington and runs a radio network broadcast over the internet and through local  
10 radio station affiliates, with programming including “Stock Talk Live,” a microcap  
11 stock news talk show broadcast live to the public. On December 19, 2007,  
12 International Broadcasting changed its name to Copper King Mining Ventures.

13 3. Through the activities alleged in this complaint, International  
14 Broadcasting has, and unless enjoined, will continue to, directly and indirectly,  
15 engage in transactions, acts, practices or courses of business which are violations of  
16 Section 10(b) of the Securities Exchange Act of 1934 (the “Exchange Act”) [15  
17 U.S.C. § 78j(b)] and Rule 10b-5 [17 C.F.R. § 240.10b-5] promulgated thereunder.

18 4. The SEC brings this action pursuant to Sections 21(d) and (e) of the  
19 Exchange Act [15 U.S.C. §§ 78u(d) and 78u(e)].

1 **JURISDICTION**

2 5. This Court has jurisdiction pursuant to Section 27 of the Exchange Act  
3 [15 U.S.C. § 78aa] and 28 U.S.C. § 1331.

4 6. The acts, practices and courses of business constituting the violations  
5 alleged herein occurred within the jurisdiction of the United States District Court  
6 for the Eastern District of Washington and elsewhere.

7 7. International Broadcasting is located in, and transacts business in, the  
8 Eastern District of Washington and elsewhere.

9 8. International Broadcasting, directly or indirectly, has made, and is  
10 making, use of the mails or the means or instrumentalities of interstate commerce in  
11 connection with the transactions, acts, practices and courses of business alleged  
12 herein, in the Eastern District of Washington and elsewhere.

13 **DEFENDANT**

14 9. International Broadcasting Corporation is a publicly-held Nevada  
15 corporation with its principal place of business in Spokane, Washington.

16 International Broadcasting was formed as a news media company.

17 10. International Broadcasting operates a radio network broadcast over the  
18 internet and through local radio station affiliates, with programming including  
19 “Stock Talk Live,” a microcap stock news talk show broadcast live to the public.

1 FACTS

2 **DEFENDANT INTERNATIONAL BROADCASTING ISSUED**

3 **FALSE PRESS RELEASES**

4 **The False October 28, 2005 Press Release**

5 11. On October 28, 2005, Fleming caused International Broadcasting to  
6 issue a press release announcing that it had acquired an AM radio affiliate, WIBQ-  
7 AM 1220 in Sarasota, Florida (“WIBQ”) to carry International Broadcasting  
8 programming. This press release quoted station general manager Scott Jacobson  
9 regarding his enthusiasm for acquiring International Broadcasting programming,  
10 particularly “Stock Talk Live.” This press release also claimed that WTMY and  
11 WWPR were International Broadcasting affiliates.

12 12. The October 28, 2005 press release was false. WIBQ never played  
13 International Broadcasting programming, no one at WIBQ ever had any  
14 communications with anyone at International Broadcasting, and no one named  
15 Scott Jacobson worked at WIBQ. WTMY and WWPR were no longer  
16 International Broadcasting affiliates.

17 13. Fleming knew, or was reckless in not knowing, that the October 28,  
18 2005 press release was materially false.

1 **The False November 10, 2005 Press Release**

2 14. On November 10, 2005, Fleming caused International Broadcasting to  
3 issue another press release, announcing that it had acquired a 100,000 Watt FM  
4 radio affiliate, WTKS 104.1 FM in Cocoa Beach, Florida (“WTKS”) to carry  
5 International Broadcasting programming. The press release quoted WTKS  
6 program director Katherine Brown regarding her enthusiasm for acquiring  
7 International Broadcasting programming, particularly “Stock Talk Live.” This  
8 press release claimed that International Broadcasting now had four affiliates:  
9 WTMY, WWPR, WIBQ, and WTKS.

10 15. The November 10, 2005 press release was also false. WTKS had  
11 never agreed to carry International Broadcasting programming. Furthermore,  
12 Katherine Brown, the WTKS program director, was never interviewed or ever  
13 spoke the words attributed to her in the November 10 press release.

14 16. On November 14, 2005, International Broadcasting issued a press  
15 release retracting the November 10, 2005 release “due to erroneous content and  
16 fabricated quotes . . . . In fact, there have been no communications between  
17 [WTKS] and [International Broadcasting].”

18 17. Fleming knew, or was reckless in not knowing, that the November 10,  
19 2005 press release was materially false.

1       **DEFENDANT INTERNATIONAL BROADCASTING’S FORMER CEO**  
2       **MADE MATERIAL MISREPRESENTATIONS OVER THE COMPANY’S**  
3       **RADIO BROADCAST**

4                               **November 14, 2005 Misrepresentations**

5           18.    On November 14, 2005, Fleming made public statements on a “Stock  
6    Talk Live” radio broadcast.

7           19.    During that radio broadcast, an International Broadcasting investor  
8    called into the show and stated that he had been told by Katherine Brown that the  
9    November 10, 2005 press release was false. Fleming stated that the November 10,  
10   2005 press release was not false, but that the owners of the radio station mentioned  
11   in that press release had made a “mistake.”

12           20.    When the investor asked Fleming whether any previous International  
13   Broadcasting press releases were also mistakes, Fleming stated that there were no  
14   other mistakes, and that International Broadcasting had three affiliates. Fleming  
15   also stated that the problem was related to the fact that the radio station discussed in  
16   the November 10, 2005 press release was in the process of being sold.

17           21.    The public statements made by Fleming on November 14, 2005 were  
18   false. The radio station discussed in the November 10, 2005 press release was not  
19   being sold, and International Broadcasting had no affiliates playing the company’s  
20   programming.

1 22. Fleming knew, or was reckless in not knowing, that these public  
2 statements he made on November 14, 2005 were false.

3 **November 16, 2005 Misrepresentations**

4 23. On November 16, 2005, Fleming made public statements on a “Stock  
5 Talk Live” radio broadcast.

6 24. During that radio broadcast, an International Broadcasting investor  
7 called into the show and stated that he had previously called the radio stations  
8 mentioned in the October 28, 2005 and November 10, 2005 press releases to  
9 confirm those press releases and was told by both stations that the releases were  
10 false.

11 25. Fleming stated that the owner of the radio station mentioned in the  
12 November 10, 2005 press release “forced” International Broadcasting to issue the  
13 November 14, 2005 retraction “for legal reasons because of a change in  
14 ownership.” Fleming also stated that the radio station mentioned in the October 28,  
15 2005 press release was incorrect in claiming that the press release was false due to  
16 “ownership overlap” with a new station manager coming in. Finally, Fleming  
17 stated that International Broadcasting would be back on that station again.

18 26. These public statements made by Fleming on November 16, 2005  
19 were false. There was never any potential purchase of either radio station

1 anywhere near the time of these announcements, nor had been there any change of  
2 ownership or “ownership overlap,” or even any contemplation of adding  
3 International Broadcasting programming to their broadcasts.

4 27. Fleming knew, or was reckless in not knowing, that these public  
5 statements he made on November 16, 2005 were false.

#### 6 **November 28, 2005 Misrepresentations**

7 28. On November 28, 2005, Fleming made public statements on a “Stock  
8 Talk Live” radio broadcast.

9 29. During that radio broadcast, an agent of International Broadcasting,  
10 Mathew Bruce (“Bruce”) called into the show to explain the controversies over the  
11 October 28, 2005 and November 10, 2005 press releases. Bruce stated that  
12 International Broadcasting had entered into an affiliation agreement with potential  
13 buyers of the radio station mentioned in the November 10, 2005 press release, but  
14 because that potential purchase of that station fell through, this affiliation did as  
15 well. Bruce claimed that the November 10, 2005 release was true but that the  
16 owner of the radio station forced International Broadcasting to release the  
17 November 14, 2005 retraction anyway. Bruce also claimed that the radio station  
18 mentioned in the October 28, 2005 press release was in fact playing International  
19 Broadcasting programming around the time of that press release. Bruce also



1 claimed that this radio station was now interested in playing International  
2 Broadcasting on its overnight block of programming.

3 30. In response to most of Bruce’s public statements made on November  
4 28, 2005, Fleming indicated his agreement, interjecting “correct,” “that’s right,” or  
5 “yeah.” After Bruce finished speaking, Fleming stated:

6 There you go, ladies and gentlemen. That clears the air for what  
7 happened, as I said, I would talk about, and there you have it. . . .

8 [T]hat's Matt Bruce, a man of honor and integrity in helping us get the  
9 job done.

10 31. The public statements made by Bruce on November 28, 2005 were  
11 false, and thus the affirmations and adoptions of those statements by Fleming on  
12 behalf of the company were also false. There was never any potential sale of either  
13 radio station in question, nor did either ever agree to or contemplate carrying  
14 International Broadcasting content.

15 32. Fleming knew, or was reckless in not knowing, that the public  
16 statements made on November 28, 2005 were false.

17 **DEFENDANT INTERNATIONAL BROADCASTING MADE MATERIAL**  
18 **MISREPRESENTATIONS IN ITS FORM 10-QSB FILED ON JANUARY 13,**  
19 **2006**

33. On January 13, 2006, International Broadcasting filed its Form 10-

1 QSB for the quarter ending September 30, 2005, signed and certified by Fleming.

2 Under Item 2, Management's Discussion and Analysis, the 10-QSB stated:

3 On November 10, 2005, the Company announced that it had secured a  
4 radio station affiliate to carry our programming. The announcement  
5 was premature and was based upon a prospective sale of the radio  
6 station, which did not happen. We were forced to put out a press  
7 release retracting the radio station affiliate announcement by the  
8 current owner of that station. However, the material events and quotes  
9 in that press release were correct as announced.

10 34. These assertions were false. There was never any prospective sale of  
11 the radio station, and the material events and quotes in the November 10, 2005  
12 press release were false.

13 35. Fleming knew, or was reckless in not knowing, that the assertions  
14 made in the company's Form 10-QSB for the quarter ending September 30, 2005  
15 were false.

16 **COUNT I**  
17 **Violations of Section 10(b) of the Exchange Act,**  
18 **and Exchange Act Rule 10b-5**

18 36. Paragraphs 1 through 35 are re-alleged and incorporated by reference  
19 as though fully set forth herein.



1 charged and alleged herein.

2 **II.**

3 Grant an Order of Permanent Injunction, in a form consistent with Rule 65(d)  
4 of the Federal Rules of Civil Procedure, permanently restraining and enjoining  
5 Defendant International Broadcasting, its officers, agents, servants, employees,  
6 attorneys and those persons in active concert or participation with them who  
7 receive actual notice of the Order, by personal service or otherwise, and each of  
8 them from, directly or indirectly, engaging in the transactions, acts, practices or  
9 courses of business described above, or in conduct of similar purport and object, in  
10 violation of Section 10(b) of the Exchange Act [15 U.S.C. § 78j] and Rule 10b-5  
11 [17 C.F.R. § 240.10b-5] thereunder.

12 **III.**

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

17 **IV**

18 Grant an Order for any other relief this Court deems appropriate.  
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Respectfully submitted,

s/ Jonathan S. Polish  
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Dated: January 23, 2008