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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11
12 **SECURITIES AND EXCHANGE**
13 **COMMISSION,**

14 Plaintiff,

15 v.

16 **INVESTSOURCE, INC., and**
17 **SONGKRAM ROY SAHACHAISERE,**

18 Defendants.

Case No. **SACV 10-01041 DOC (RNBx)**
COMPLAINT

19
20 Plaintiff Securities and Exchange Commission ("Commission") alleges as
21 follows:

22 1. This Court has jurisdiction over this action pursuant to Sections 20(b),
23 20(d)(1) and 22(a) of the Securities Act of 1933 ("Securities Act"), 15 U.S.C.
24 §§ 77t(b), 77t(d)(1) and 77v(a), and Sections 21(d)(1), 21(d)(3)(A), 21(e) and 27 of
25 the Securities Exchange Act of 1934 ("Exchange Act"), 15 U.S.C. §§ 78u(d)(1),
26 78u(d)(3)(A), 78u(e) and 78aa. Defendants InvestSource, Inc. and Songkram Roy
27 Sahachaisere have, directly or indirectly, made use of the means or
28 instrumentalities of interstate commerce, or the mails, or of the facilities of a

1 national securities exchange in connection with the transactions, acts, practices and
2 courses of business alleged in this Complaint.

3 2. Venue is proper in this District pursuant to Section 22(a) of the
4 Securities Act, 15 U.S.C. § 77v(a), and Section 27 of the Exchange Act, 15 U.S.C.
5 § 78aa, because certain of the transactions, acts, practices and courses of conduct
6 constituting violations of the federal securities laws occurred within this District,
7 both Defendants transact business in this District, Defendant InvestSource, Inc. is
8 located in this District, and Defendant Songkram Roy Sahachaisere resides in this
9 District.

10 SUMMARY

11 3. This is a securities fraud case brought against an Orange County stock
12 promotion company, InvestSource, Inc. (“InvestSource”), and its founder and sole
13 owner, Songkram Roy Sahachaisere (“Sahachaisere”) (collectively, “Defendants”).

14 4. From approximately March 2008 through March 2009, Defendants
15 engaged in massive email campaigns promoting the penny stocks of their clients,
16 including the seven issuers discussed in this Complaint, often sending such emails to
17 hundreds of thousands of recipients. These email touts failed to disclose that
18 Defendants had been compensated for their promotions. Furthermore, Defendants
19 made misleading statements on InvestSource’s website regarding the nature of the
20 compensation received for InvestSource providing services to its penny stock issuer
21 clients. Finally, both the email touts and the website failed to disclose that
22 Defendants were selling the very securities they were recommending that investors
23 buy.

24 5. By engaging in the conduct alleged in this Complaint, Defendants
25 violated, and unless restrained and enjoined will continue to violate, the antifraud
26 provisions of Section 17(a) of the Securities Act, 15 U.S.C. § 77q(a), and
27 Section 10(b) of the Exchange Act, 15 U.S.C. § 78j(b), and Rule 10b-5 thereunder,
28 17 C.F.R. § 240.10b-5, and the prohibition against accepting undisclosed

1 compensation for touting stocks , Section 17(b) of the Securities Act, 15 U.S.C.
2 § 77q(b). Defendants reaped ill-gotten gains of approximately \$276,726 as a result
3 of their illegal conduct.

4 **DEFENDANTS**

5 6. **InvestSource, Inc.** (“InvestSource”) is a California corporation based
6 in Huntington Beach, California. At all times relevant to this action, InvestSource
7 provided “investor relations services” to penny stock issuers.

8 7. **Songkram Roy Sahachaisere**, (“Sahachaisere”), age 40, resides in
9 Huntington Beach, California. He founded InvestSource in late 2003 and is its sole
10 owner and officer. He is also an officer and director of FIMA, Inc., one of the
11 issuers whose securities he promoted and sold. During all relevant times,
12 Sahachaisere also controlled Thorne Legal, Inc., which was renamed Thorne
13 Industries, Inc. (“Thorne”). Sahachaisere sold securities through accounts which
14 he controlled in his own name, and in the names of InvestSource and Thorne.
15 From January 1997 through September 2003, Sahachaisere was employed for
16 varying periods by six different broker-dealer firms registered with the
17 Commission, and held various securities licenses.

18 **THE FRAUDULENT SCHEME**

19 **A. Defendants Promoted Penny Stocks**

20 8. At all times relevant to this action, InvestSource provided “investor
21 relations services” to penny stock issuers, including touting in InvestSource’s daily
22 email newsletter, called the “Daily Digest,” that was sent to thousands of potential
23 investors; creating and posting clients’ “company profiles” on InvestSource’s
24 website; and distributing press releases.

25 9. The term “penny stock” is defined in Commission Rule 3a51-1, 17
26 C.F.R. § 240.3a51-1. The stocks touted and traded by Defendants qualify as
27 “penny stocks” because, among other things, they had a price of less than \$5 per
28 share, as set forth in Rule 3a51-1(d). The prices of the penny stocks touted and

1 traded by Defendants were quoted over-the-counter on the “OTC Bulletin Board”
2 or in the “Pink Sheets.”

3 10. Between January 2008 and March 2009, InvestSource had
4 approximately 85 clients, almost all penny stock issuers. Most clients paid
5 InvestSource in securities, not cash. In some circumstances, clients paid the
6 securities to Sahachaisere or his entity Thorne, instead of InvestSource.

7 11. InvestSource sent its Daily Digest to the email addresses in its
8 database nearly every weekday. The size of InvestSource’s email campaigns grew
9 over time, and by the autumn of 2008, InvestSource routinely sent email messages
10 to several hundred thousand addresses. Between January 1, 2008 and March 31,
11 2009, InvestSource sent nearly 450 email messages to over 24 million recipients.

12 12. InvestSource varied the format of its Daily Digest, changing the
13 number of clients promoted or the type of information presented, such as a
14 company profile, press release, or alerts about the price or volume of stock trading.
15 InvestSource’s theme, however, did not change: it described its clients and their
16 business prospects in positive terms and explicitly or implicitly recommended that
17 investors purchase the securities of the featured companies.

18 13. When InvestSource and Sahachaisere started promoting a particular
19 client’s securities through its Daily Digest, they also created and posted a
20 “company profile” on InvestSource’s website at www.investsourceinc.com. Those
21 profiles included several different types of information about the issuer, including
22 a summary page containing a short description of the issuer along with securities
23 trading data, a description of the issuer’s management, and InvestSource’s
24 newsletters about that issuer.

25 14. InvestSource’s promotions often correlated with increases in
26 securities’ trading volume. For example, five of the seven securities at issue in this
27 action (China Forestry, Inc., FIMA, Inc., Heart Health, Inc., New Asia Gold Corp.,
28 and Praebius Communications, Inc.) experienced significant increases in trading

1 volume during InvestSource's promotions. Its promotion of PureSpectrum, Inc.
2 correlated with a huge increase in price, from \$0.14 to \$0.42 per share, with a high
3 of \$0.77 per share during the promotion.

4 **B. Defendants' Misrepresentations and Omissions**

5 15. Undisclosed to the email newsletter recipients, InvestSource and
6 Sahachaisere repeatedly sold the stock of the issuers they promoted while engaged
7 in the promotional activities. InvestSource and Sahachaisere did not disclose the
8 compensation received or their securities trading in any of InvestSource's email
9 newsletters. Instead, each email included the word "disclaimer" and a link to
10 InvestSource's website. The link took investors to InvestSource's "main
11 disclaimer" website page, which stated in relevant part:

12 The companies listed on the 'Featured Companies' section of our
13 website **may have compensated the Company [InvestSource] to be**
14 **profiled on this website.** These companies (or some of these
15 companies) have retained us to perform public relations, or media
16 relations or even investor relation services including promotional
17 services that consist of the placement of the profiled companies on
18 our website. **Such compensation has been or will be made in cash**
19 **and or [sic] issuance of securities** of the profiled company. The
20 specific compensation type and amounts that the company has been
21 paid from each respective company is set forth on the transcript box
22 accessible from each respective company page within our site. We
23 may liquidate any securities that we receive as compensation when
24 deemed appropriate to do so, however, **we attempt to liquidate such**
25 **securities upon receipt thereof prior to performing any services**
26 **for such company.** Such liquidation may have a negative impact on
27 the securities being liquidated.

28 [emphasis added].

1 16. This “main disclaimer” was materially false and misleading because it
2 stated that: (1) InvestSource “may” have been compensated for its services when,
3 in fact, InvestSource or its principal, Sahachaisere, was always compensated;
4 (2) InvestSource attempted to liquidate securities it received as compensation for
5 its services upon receipt thereof prior to performing any services, when, in fact, as
6 set forth below with respect to specific stocks, Defendants sold the securities after
7 several touts recommending their purchase, and profited thereby; and (3) the
8 statement that InvestSource planned to sell securities before promoting them was
9 materially false because its practice was to sell securities while promoting them.

10 17. InvestSource’s website contained additional disclosures located
11 elsewhere. Each of the clients’ “company profile” sections included many tabs
12 from which to select, and one of these tabs was labeled “disclaimer.” These
13 company-specific disclaimers, however, were inadequate because they omitted
14 disclosure regarding securities sales. After Defendants were contacted during the
15 Commission’s investigation, they revised the company-specific disclaimer website
16 pages to list the number of shares sold and the amount of sales proceeds, but still
17 failed to disclose that they were continuing to sell the securities while promoting
18 them. Defendants similarly failed to correct the main disclaimer website page to
19 accurately disclose that Defendants were always compensated for promoting the
20 securities, that the compensation was almost always in securities, and that
21 Defendants promoted the purchase of the stock to potential buyers before, during
22 and after their sales of those same stocks.

23 18. Between March 2008 and March 2009, Defendants fraudulently
24 recommended purchase of the following seven penny stocks without adequately
25 disclosing their compensation and their simultaneous sales of those same stocks:
26 China Forestry, Inc. (CHFY); FIMA, Inc. (FIMA); Heart Health, Inc. (HHEL);
27 New Asia Gold Corporation (NWAG); Obee’s Franchise Systems, Inc. (OBEE);
28 Praebius Communications, Inc. (PRCM); and Pure Spectrum, Inc. (PSPM).

1 Sahachaisere maintained nearly three dozen brokerage accounts at 18 different
 2 broker-dealers, and sold the above stocks through many of these brokerage
 3 accounts. As set forth in the chart below, Defendants sold over 5 million shares of
 4 these seven issuers, illegally reaping profits of \$276,726:

Penny Stock Issuer	Dates of Promotion	Dates of Stock Sales	Number of Shares Sold	Proceeds of Stock Sales
CHFV	10/15/08 to 1/22/09	11/17/08 and 12/31/08	207,000	\$127,262
FIMA	3/25/08 to 6/25/08	4/16/08 to 6/26/08	70,000	\$24,591
HHEL	9/2/08 to 10/23/08	10/7/08 to 2/11/09	271,080	\$15,141
NWAG	8/18/08 to 11/19/08	8/21/08 to 11/20/08	606,475	\$27,280
OBEE	10/14/08 to 10/24/08	10/8/08 to 2/12/09	64,200	\$11,788
PRCM	10/3/08 to 10/23/08	10/7/08 to 1/27/09	4,490,254	\$49,215
PSPM	7/23/08 to 3/12/09	8/27/08 to 3/23/09	94,600	\$21,449
Summary	3/25/08 to 3/12/09	4/16/08 to 3/23/09	5,803,609	\$276,726

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1 **1. Fraudulent Touting of the Stock of China Forestry, Inc.**
2 **("China Forestry")**

3 19. China Forestry issued securities, falling within the meaning of a
4 "penny stock," that were quoted on the OTC Bulletin Board under the symbol
5 CHFY. In September 2008, InvestSource and Sahachaisere were retained by
6 China Forestry to provide investor relations services. On or about September 19,
7 2008, they received 240,000 shares of stock as compensation.

8 20. Between October 15, 2008 and January 22, 2009, Sahachaisere caused
9 InvestSource to transmit multiple emails touting China Forestry stock.

10 InvestSource's emails promoted China Forestry as "a forest investment group
11 offering U.S. investors the unique opportunity to participate in the booming
12 Chinese forestry industry." Sahachaisere also caused InvestSource to include
13 China Forestry's company profile on InvestSource's website beginning on or about
14 October 20, 2008. During this same time, undisclosed to the recipients of the
15 touts, Defendants sold CHFY shares as described above and reaped profits.

16 21. Defendants also did not disclose the stock compensation in the
17 "disclaimer" link in the email touts and in InvestSource's "main disclaimer"
18 website page.

19 **2. Fraudulent Touting of the Stock of FIMA, Inc. ("FIMA")**

20 22. On or about February 12, 2008, Sahachaisere was appointed
21 Chairman of the Board and Chief Executive of FIMA, a company purportedly
22 engaged in land development in Latin America. FIMA issued securities, falling
23 within the meaning of a "penny stock," that were quoted on the Pink Sheets under
24 the symbol FIMA. On or about February 15, 2008, FIMA transferred 100,000
25 shares of stock to an InvestSource brokerage account. On or about March 5, 2008,
26 pursuant to Sahachaisere's employment agreement with FIMA, Sahachaisere was
27 issued 11,250,000 FIMA shares, constituting 17.3% of the company's stock.

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1 23. Between March 25 and June 25, 2008, Sahachaisere caused
2 InvestSource to transmit multiple emails touting FIMA stock, as well as issuing
3 several press releases. At least three of the email touts occurred on or before
4 April 9, 2008. Beginning on or about April 2, 2008, Sahachaisere also caused
5 InvestSource to include FIMA's company profile, which he helped write, on its
6 website.

7 24. During this same time, undisclosed to the recipients of the touts,
8 Defendants sold FIMA shares as described above and reaped profits.

9 25. Defendants also did not disclose the stock compensation in the
10 "disclaimer" link in the email touts and in InvestSource's "main disclaimer"
11 website page.

12 **3. Fraudulent Touting of the Stock of Heart Health, Inc.**
13 **("Heart Health")**

14 26. Heart Health issued securities, falling within the meaning of a "penny
15 stock," that were quoted on the Pink Sheets under the symbol HHEL. In August
16 2008, InvestSource and Sahachaisere were retained by Heart Health to provide
17 investor relations services. On or about October 2, 2008, they received one million
18 shares of Heart Health stock as compensation.

19 27. Between September 2 and October 23, 2008, Sahachaisere caused
20 InvestSource to send out multiple emails touting Heart Health stock.
21 InvestSource's emails included glowing descriptions of Heart Health, touting that
22 it will "revolutionize the way in which people monitor the health of their hearts."
23 In addition, one email included a "trade alert" that Heart Health stock just
24 experienced a "50% increase from .20 to .30 with no resistance." Finally,
25 InvestSource sent out email spam strongly recommending that investors buy three
26 stocks that were InvestSource clients, including Heart Health, with the tout: "3
27 Picks to Click -- Add some punch to your portfolio with these emerging growth
28 companies." Sahachaisere also caused InvestSource to include Heart Health's

1 company profile on InvestSource's website beginning on or about October 17,
2 2008. During this same time, undisclosed to the recipients of the touts, Defendants
3 sold HHEL shares as described above and reaped profits.

4 28. Defendants also did not disclose the stock compensation in the
5 "disclaimer" link in the email touts and in InvestSource's "main disclaimer"
6 website page.

7 4. **Fraudulent Touting of the Stock of New Asia Gold Corp.**
8 **("New Asia")**

9 29. New Asia issued securities, falling within the meaning of a "penny
10 stock," that were quoted on the Pink Sheets under the symbol NWAG. In July
11 2008, InvestSource and Sahachaisere were retained by NWAG to provide investor
12 relations services. On or about August 18, 2008, they received 9,375 shares of
13 stock as compensation, and on or about October 17, 2008, they received an
14 additional 1 million shares of stock.

15 30. Between August 18 and November 19, 2008, Sahachaisere caused
16 InvestSource to transmit multiple emails touting New Asia stock. The emails
17 included New Asia's company profile containing glowing descriptions of New
18 Asia. One email included a "trade and volume alert" concerning NWAG stock and
19 touted that "many other gold companies have found significant success in the
20 current market, and New Asia Gold is confident that the Company can duplicate or
21 even exceed that success." Sahachaisere also caused InvestSource to include New
22 Asia's company's profile on InvestSource's website beginning on or about
23 August 18, 2008. During this same time, undisclosed to the recipients of the touts,
24 Defendants sold NWAG shares as described above and reaped profits.

25 31. Defendants also did not disclose the stock compensation in the
26 "disclaimer" link in the email touts and in InvestSource's "main disclaimer"
27 website page.

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1 **5. Fraudulent Touting of the Stock of Obee's Franchise**
2 **Systems, Inc. ("Obee")**

3 32. Obee issued securities, falling within the meaning of a "penny stock,"
4 that were quoted on the Pink Sheets under the symbol OBEE. InvestSource and
5 Sahachaisere were retained by Obee to provide investor relations services. On or
6 about October 2, 2008, they received 800,000 shares of stock as compensation,
7 and, on or about October 31, 2008, they received another 800,000 shares.

8 33. Between October 14 and 24, 2008, Sahachaisere caused InvestSource
9 to transmit multiple emails touting Obee stock. One email included a "trade and
10 volume alert" about Obee stock. Sahachaisere also caused InvestSource to include
11 Obee's profile on InvestSource's website beginning on or about October 24, 2008.
12 During this same time, undisclosed to the recipients of the touts, Defendants sold
13 OBEE shares as described above and reaped profits.

14 34. Defendants also did not disclose the stock compensation in the
15 "disclaimer" link in the email touts and in InvestSource's "main disclaimer"
16 website page.

17 **6. Fraudulent Touting of the Stock of Praebius**
18 **Communications, Inc. ("Praebius")**

19 35. Praebius issued securities, falling within the meaning of a "penny
20 stock," that were quoted on the Pink Sheets under the symbol PRCM.
21 InvestSource and Sahachaisere were retained by Praebius to provide investor
22 relations services. On or about October 2, 2008, they received 2,500,000 shares of
23 stock as compensation, on or about October 21, 2008, they received another
24 800,000 shares, and on or about November 25, 2008, they received another
25 800,000 shares.

26 36. Between October 3 and 23, 2008, Sahachaisere caused InvestSource
27 to transmit multiple emails touting Praebius stock. InvestSource sent out email
28 spam strongly recommending that investors buy three stocks that were

1 InvestSource clients, including Heart Health, discussed above, and Praebius, with
2 the tout: "3 Picks to Click -- Add some punch to your portfolio with these
3 emerging growth companies." Sahachaisere also caused InvestSource to include
4 Praebius' profile on InvestSource's website beginning on or about October 17,
5 2008. During this same time, undisclosed to the recipients of the touts, Defendants
6 sold PRCM shares as described above and reaped profits.

7 37. Defendants also did not disclose the stock compensation in the
8 "disclaimer" link in the email touts and in InvestSource's "main disclaimer"
9 website page.

10 7. **Fraudulent Touting of the Stock of PureSpectrum, Inc.**
11 **("PureSpectrum")**

12 38. PureSpectrum issued securities, falling within the meaning of a
13 "penny stock," that were quoted on the Pink Sheets under the symbol PRCM.
14 InvestSource and Sahachaisere were as retained by PureSpectrum to provide
15 investor relations services. On or about July 1, 2008, they received 58,600 share of
16 stock as compensation, and on or about January 20, 2009, they received another
17 36,000 shares.

18 39. Between July 23, 2008 and March 12, 2009, Sahachaisere caused
19 InvestSource to transmit multiple emails touting PureSpectrum stock. One email
20 touted stated that PureSpectrum had engaged consultants so that it could "elevate
21 its stock to the American Stock Exchange" and explained why this change would
22 be good for shareholders. Another email included price predictions for PSPM
23 stock. Sahachaisere also caused InvestSource to include PureSpectrum's profile on
24 InvestSource's website beginning on or about July 11, 2008. During this same
25 time, undisclosed to the recipients of the touts, Defendants sold PSPM shares as
26 described above and reaped profits.

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1 40. Defendants also did not disclose the stock compensation in the
2 “disclaimer” link in the email touts and in InvestSource’s “main disclaimer”
3 website page.

4 **FIRST CLAIM FOR RELIEF**

5 **Fraud In The Offer Or Sale Of Securities**

6 **Violations Of Section 17(a) Of The Securities Act, 15 U.S.C. § 77q(a)**

7 41. The Commission realleges and incorporates by reference paragraphs 1
8 through 40 above.

9 42. Defendants InvestSource and Sahachaisere, and each of them, by
10 engaging in the conduct described above, in the offer or sale of securities by the
11 use of means or instruments of transportation or communication in interstate
12 commerce or by use of the mails, directly or indirectly:

- 13 a. with scienter, employed devices, scheme, or artifices to defraud;
14 b. obtained money or property by means of untrue statements of a
15 material fact or by omitting to state a material fact necessary in order
16 to make the statements made, in light of the circumstances under
17 which they were made, not misleading; or
18 c. engaged in transactions, practices, or courses of business which
19 operated or would operate as a fraud or deceit upon the purchaser.

20 43. By engaging in the conduct described above, InvestSource and
21 Sahachaisere violated, and unless restrained and enjoined will continue to violate,
22 Section 17(a) of the Securities Act , 15 U.S.C. § 77q(a).

23 **SECOND CLAIM FOR RELIEF**

24 **Fraud In Connection With The Purchase Or Sale Of Securities**

25 **Violations Of Section 10(b) Of The Exchange Act, 15 U.S.C. § 78j(b),**

26 **And Rule 10b-5 Thereunder, 15 U.S.C. § 240.10b-5**

27 44. The Commission realleges and incorporates by reference paragraphs 1
28 through 40 above.

1 45. Defendants InvestSource and Sahachaisere, and each of them, by
2 engaging in the conduct described above, directly or indirectly, in connection with
3 the purchase or sale of a security, by the use of means or instrumentalities of
4 interstate commerce, of the mails, or of the facilities of a national securities
5 exchange, with scienter:

- 6 a. employed devices, schemes, or artifices to defraud;
- 7 b. made untrue statements of a material fact or omitted to state a material
8 fact necessary in order to make the statements made, in the light of the
9 circumstances under which they were made, not misleading; or
- 10 c. engaged in acts, practices, or courses or business which operated or
11 would operate as a fraud or deceit upon other persons.

12 46. By engaging in the conduct describe above, InvestSource and
13 Sahachaisere violated, and unless restrained and enjoined will continue to violate,
14 Section 10(b) of the Exchange Act, 15 U.S.C. § 78j(b), and Rule 10b-5 thereunder,
15 17 C.F.R. § 240.10b-5.

THIRD CLAIM FOR RELIEF

Undisclosed Compensation For Stock Touting

Violations Of Section 17(b) Of The Securities Act, 15 U.S.C. § 77q(b)

18 47. The Commission realleges and incorporates by reference paragraphs 1
19 through 40 above.

20 48. Defendants InvestSource and Sahachaisere, by engaging in the
21 conduct described above, by use of means or instruments of transportation or
22 communication in interstate commerce, or by the use of the mails, published, gave
23 publicity to, or circulated notices, circulars, advertisements, newspapers, articles,
24 letters, investment services or communications which, though not purporting to
25 offer securities for sale, described such securities for consideration received or to
26 be received, directly or indirectly, from an issuer, underwriter, or dealer, without
27 fully disclosing the receipt, whether past or prospective, of such consideration and
28

1 the amounts thereof.

2 49. By reason of the foregoing, InvestSource and Sahachaisere have
3 violated, and unless enjoined will continue to violate, Section 17(b) of the
4 Securities Act, 15 U.S.C. § 77q(b).

5 **PRAYER FOR RELIEF**

6 Wherefore, the Commission respectfully requests that this Court:

7 **I.**

8 Issue findings of fact and conclusions of law that Defendants committed the
9 alleged violations.

10 **II.**

11 Issue judgments, in forms consistent with Fed. R. Civ. P. 65(d), permanently
12 enjoining InvestSource and Sahachaisere and their officers, agents, servants,
13 employees, and attorneys, and those persons in active concert or participation with
14 any of them, who receive actual notice of the judgment by personal service or
15 otherwise, and each of them, from violation of Sections 17(a) and 17(b) of the
16 Securities Act, 15 U.S.C. §§ 77q(a) and 77q(b), and Section 10(b) of the Exchange
17 Act, 15 U.S.C. § 78j(b), and Rule 10b-5 thereunder, 17 C.F.R. § 240.10b-5.

18 **III.**

19 Order each Defendant to disgorge all ill-gotten gains from their illegal
20 conduct, together with prejudgment interest thereon.

21 **IV.**

22 Order each Defendant to pay a civil penalty under Section 20(d) of the
23 Securities Act, 15 U.S.C. § 77t(d), and Section 21(d)(3) of the Exchange Act, 15
24 U.S.C. § 78u(d)(3).

25 **V.**

26 Enter an order, pursuant to pursuant to Section 20(e) of the Securities Act,
27 15 U.S.C. § 77t(e), and Section 21(d)(2) of the Exchange Act, 15 U.S.C.
28 § 78u(d)(2), barring Defendant Sahachaisere from acting as an officer or director

1 of any issuer that has a class of securities registered pursuant to Section 12 of the
2 Exchange Act, 15 U.S.C. § 781, or that is required to file reports pursuant to
3 Section 15(d) of the Exchange Act, 15 U.S.C. § 78o(d).

4 **VI.**

5 Enter an order barring Defendant Sahachaisere from participating in the
6 offering of any penny stock pursuant to Section 20(g) of the Securities Act, 15
7 U.S.C. § 77t(g) and Section 21(d)(6) of the Exchange Act [15 U.S.C. § 78u(d)(6).

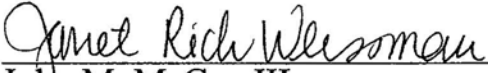
8 **VII.**

9 Retain jurisdiction of this action in accordance with the principles of equity
10 and the Federal Rules of Civil Procedure in order to implement and carry out the
11 terms of all orders and decrees that may be entered, or to entertain any suitable
12 application or motion for additional relief within the jurisdiction of this Court.

13 **VIII.**

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

16
17 Dated: July 9, 2010



John M. McCoy III
Janet Rich Weissman
Attorneys for Plaintiff
Securities and Exchange Commission