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CLERK'S OFFICE COURT  
DISTRICT OF NEVADA

BY \_\_\_\_\_ DEPUTY

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12 UNITED STATES  
13 DISTRICT

CV-S-05-0365-LDG-RJJ

14 SECURITIES AND EXCHANGE  
15 COMMISSION,

16 Plaintiff,

17 v.

18 SHANNON L. BALDINO,

19 Defendant.

COMPLAINT FOR VIOLATION  
OF AN ORDER ISSUED BY THE  
SECURITIES AND EXCHANGE  
COMMISSION

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

22 **JURISDICTION AND VENUE**

23 1. This Court has jurisdiction over this action pursuant to Sections 21(e)  
24 and 27 of the Securities Exchange Act of 1934 ("Exchange Act"), 15 U.S.C.  
25 §§ 78u(e) & 78aa.

26 2. Venue is proper in this district pursuant to Section 27 of the  
27 Exchange Act, 15 U.S.C. § 78aa, because the defendant is found, is an inhabitant  
28 of and/or transacts business in this District.

**THE DEFENDANT**

3. Defendant Shannon L. Baldino ("Baldino") resides in Henderson,  
Nevada. She was the sole owner, officer, director, and employee of Silverado

1 Stock Transfer, Inc. ("Silverado"), a transfer agent registered with the  
2 Commission, from its inception until it ceased acting as a transfer agent in  
3 November 2003.

4 **BALDINO HAS VIOLATED A COMMISSION ORDER**

5 4. On May 11, 2004, the Commission instituted an administrative and  
6 cease-and-desist proceeding against Silverado and Baldino for violations of  
7 statutes and rules under the Exchange Act applicable to registered transfer agents.  
8 In the Matter of Silverado Stock Transfer, Inc. And Shannon L. Baldino,  
9 Administrative Proceeding File No. 3-11484. The Commission simultaneously  
10 accepted the settlement offer of Silverado and Baldino, and issued an order that,  
11 among other things, required Baldino to pay a \$25,000 civil penalty to the United  
12 States Treasury within 180 days (by November 9, 2004) (the "Commission  
13 Order"). Baldino has failed to pay any of the penalty.

14 **CLAIM FOR RELIEF**

15 **VIOLATION OF COMMISSION ADMINISTRATIVE ORDER**

16 5. Paragraphs 1 through 4 are realleged and incorporated herein by  
17 reference.

18 6. Baldino's failure to pay the \$25,000 civil penalty violated the  
19 Commission Order.

20 7. By reason of the foregoing, Baldino violated, and unless enjoined,  
21 will continue to violate the terms of the Commission Order, which is enforceable  
22 by this Court pursuant to Section 21(e) of the Exchange Act, 15 U.S.C. § 78u(e).

23 **PRAYER FOR RELIEF**

24 WHEREFORE, the Commission respectfully requests that the Court:

25 **I.**

26 Issue findings of fact and conclusions of law that Baldino violated the  
27 Commission Order as alleged above.

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**II.**

Issue an Order, pursuant to Section 21(e) of the Exchange Act, 15 U.S.C. § 78u(e), requiring Baldino to comply with the Commission Order.

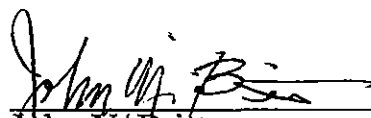
**III.**

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

**IV.**

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

DATED: March 17, 2005

  
\_\_\_\_\_  
John Y. Britt  
Attorney for Plaintiff  
Securities and Exchange Commission