

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934

Release No. 57064 / December 28, 2007

ADMINISTRATIVE PROCEEDING

File No. 3-12916

In the Matter of

MONEESH K. BAKSHI, Esq.

Respondent.

ORDER INSTITUTING PUBLIC
ADMINISTRATIVE PROCEEDINGS AND
IMPOSING TEMPORARY SUSPENSION
PURSUANT TO RULE 102(e)(3) OF THE
COMMISSION'S RULES OF PRACTICE

I.

The Securities and Exchange Commission ("Commission") deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted pursuant to Rule 102(e)(3)¹ of the Commission's Rules of Practice against Moneesh K. Bakshi ("Respondent" or "Bakshi").

¹ Rule 102(e)(3)(i) provides, in relevant part, that:

The Commission, with due regard to the public interest and without preliminary hearing, may, by order, . . . suspend from appearing or practicing before it any . . . attorney . . . who has been by name . . . (A) permanently enjoined by any court of competent jurisdiction, by reason of his or her misconduct in an action brought by the Commission, from violating . . . any provision of the Federal securities laws or of the rules and regulations thereunder; or (B) found in any court of competent jurisdiction in an action brought by the Commission to which he or she is a party . . . to have violated (unless the violation was found not to have been willful) . . . any provision of the Federal securities laws or of the rules and regulations thereunder.

II.

The Commission finds that:

A. RESPONDENT

1. Bakshi is and has been an attorney licensed to practice in the State of New York, the Commonwealth of Massachusetts, and the District of Columbia.

B. COURT FINDINGS & INJUNCTION

2. On October 25, 2007, the U.S. District Court for the Southern District of New York issued a Memorandum of Decision finding that Bakshi knowingly violated Sections 5 and 17(a) of the Securities Act of 1933, and Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5 thereunder, and knowingly aided and abetted Ramoil Management, Ltd.'s violation of Section 15(d) of the Securities Exchange Act of 1934 and Rule 15d-1 thereunder. Also on October 25, 2007, the court entered its final judgment against Bakshi, permanently enjoining him from future violations of those securities laws. Securities and Exchange Commission v. Ramoil Management, Ltd., et al., Case No. 01-CV-9057 (S.D.N.Y.).

3. The court found that Bakshi knowingly filed a Form 10-KSB that included an unsigned and falsified audit report that, among other things, stated it had been audited by a certified public accountant when in fact the named individual was not a CPA and had not conducted any audit. The court also found that Bakshi knowingly made false representations in each of four Forms S-8 and supporting opinion letters that he filed on behalf of Ramoil, which purported to issue shares in exchange for consulting services that were never actually rendered.

III.

Based upon the foregoing, the Commission finds that a court of competent jurisdiction has permanently enjoined Bakshi, an attorney, from violating the Federal securities laws within the meaning of Rule 102(e)(3)(i)(A) of the Commission's Rules of Practice. The Commission also finds that a court of competent jurisdiction has found that Bakshi, an attorney, violated the Federal securities laws within the meaning of Rule 102(e)(3)(i)(B) of the Commission's Rules of Practice. In view of these findings, the Commission deems it appropriate and in the public interest that Bakshi be temporarily suspended from appearing or practicing before the Commission.

IT IS HEREBY ORDERED that Bakshi be, and hereby is, temporarily suspended from appearing or practicing before the Commission. This Order will be effective upon service on the Respondent.

IT IS FURTHER ORDERED that Bakshi may, within thirty days after service of this Order, file a petition with the Commission to lift the temporary suspension. If the Commission receives no petition within thirty days after service of the Order, the suspension will become permanent pursuant to Rule 102(e)(3)(ii).

If a petition is received within thirty days after service of this Order, the Commission will, within thirty days after the filing of the petition, either lift the temporary suspension, or set the matter down for hearing at a time and place to be designated by the Commission, or both. If a hearing is ordered, following the hearing, the Commission may lift the suspension, censure the petitioner, or disqualify the petitioner from appearing or practicing before the Commission for a period of time, or permanently, pursuant to Rule 102(e)(3)(iii).

This Order shall be served upon Bakshi personally or by certified mail at his last known address.

By the Commission.

Nancy M. Morris
Secretary