[illegible]

[illegible]

[illegible]

Plaintiff,

[illegible]

vs.

[illegible]

[illegible]

[illegible]

Defendants.

[illegible]

Plaintiff, [illegible] (collectively, "Plaintiff"), for [illegible] against Defendants [illegible], together with numerous [illegible] affiliated entities such as [illegible] (collectively, "Defendants"), allege:

[illegible]

1. Plaintiff bring this action to [illegible] violations resulting [illegible] from [illegible] and [illegible] in the course of their business activities in the United States [illegible] in violation of New York's [illegible].

[illegible]

2. By virtue of the conduct alleged herein Defendants directly or indirectly engage in [illegible] transactions or conducts [illegible] business practices, schemes and devices of [illegible].

   2.1. [illegible] Section [illegible] of the U.S.C. [illegible] Sale and Service Plan of the Securities Exchange Act of [illegible] Rule [illegible] [illegible] and Section [illegible] of the Securities Act of [illegible] [illegible].

   2.2. [illegible]