

STATE OF MAINE
KENNEBEC, ss.

SUPERIOR COURT
CIVIL ACTION
DOCKET NO. CV-03-77

STATE OF MAINE and)
SECURITIES ADMINISTRATOR,)
)
Plaintiffs,)
)
v.)
)
KRISTOPHER T. SAUNDERS,)
(DOB: [REDACTED]))
[REDACTED])
[REDACTED])
Defendant.)

COMPLAINT FOR PUNITIVE
AND REMEDIAL SANCTIONS
FOR CONTEMPT OF COURT
(M.R.Civ.P. Rule 66(c))

Investigator Jaqueline M. Drouin, being duly sworn, deposes and says (upon information and belief), that the following is true:

COUNT I

Beginning on or about April 30, 2003, and continuing to the present, in the Counties of Kennebec and Penobscot, State of Maine, defendant KRISTOPHER T. SAUNDERS has committed contempt of court (M.R.Civ.P. 66(2)(A)(ii)), for which punitive sanctions (M.R.Civ.P. 66(c)(3)) and remedial sanctions (M.R.Civ.P. 66(c)(4)) are sought, by intentionally, knowingly or recklessly failing or refusing to perform an act required by a lawful court order that in fact was and is within his ability to perform, to wit, complete distribution of Edulink securities to their rightful owners and provide the Securities Administrator with an attestation to that effect no later than April 30, 2003, as required by the Consent Judgment signed by the Court on April 18, 2003 (a copy of which is attached to this Complaint and made a part hereof).

COUNT II

Beginning on or about April 30, 2003, and continuing to the present, in the Counties of Kennebec and Penobscot, State of Maine, defendant KRISTOPHER T. SAUNDERS has committed contempt of court (M.R.Civ.P. 66(2)(A)(ii)), for which punitive sanctions (M.R.Civ.P. 66(c)(3)) and remedial sanctions (M.R.Civ.P. 66(c)(4)) are sought, by intentionally, knowingly or recklessly failing or refusing to perform an act required by a lawful court order that in fact was and is within his ability to perform, to wit, provide the Securities Administrator, no later than April 30, 2003, with a complete list of investors, including each of their addresses and phone numbers, as required by the Consent Judgment signed by the Court on April 18, 2003 (a copy of which is attached to this Complaint and made a part hereof).

COUNT III

Beginning on or about May 15, 2003, and continuing to the present, in the Counties of Kennebec and Penobscot, State of Maine, defendant KRISTOPHER T. SAUNDERS has committed contempt of court (M.R.Civ.P. 66(2)(A)(ii)), for which punitive sanctions (M.R.Civ.P. 66(c)(3)) and remedial sanctions (M.R.Civ.P. 66(c)(4)) are sought, by intentionally, knowingly or recklessly failing or refusing to perform an act required by a lawful court order that in fact was and is within his ability to perform, to wit, provide the Securities Administrator, no later than May 15, 2003, with a thorough and detailed accounting of all funds SAUNDERS received from investors, as required by the Consent Judgment entered on April 18, 2003 (a copy of which is attached to this Complaint and made a part hereof).

COUNT IV

Beginning on or about June 30, 2003, and continuing to the present, in the Counties of Kennebec and Penobscot, State of Maine, defendant KRISTOPHER T. SAUNDERS has committed contempt of court (M.R.Civ.P. 66(2)(A)(ii)), for which punitive sanctions (M.R.Civ.P. 66(c)(3)) and remedial sanctions (M.R.Civ.P. 66(c)(4)) are sought, by intentionally, knowingly or recklessly failing or refusing to perform an act required by a lawful court order that in fact was and is within his ability to perform, to wit, disgorge to the Securities Administrator, no later than June 2, 2003, any funds Saunders received from investors that were not invested in Edulink shares on their behalf, as required by the Consent Judgment entered on April 18, 2003 (a copy of which is attached to this Complaint and made a part hereof).

Jacqueline M. Drouin
JAQUELINE M. DROUIN
Investigator, Office of Securities

Sworn to before me, August 7, 2003

Michele Garwood
Clerk, Superior Court

TIME AND PLACE OF A HEARING
(M.R.Civ.P. 66(c)(2)(C)(ii))

Tuesday, September 9, 2003, commencing at 8:30 a.m., at the Kennebec County Superior Court Courthouse, 95 State Street, Augusta, Maine, before the Superior Court of Kennebec County.