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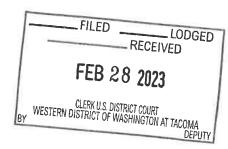
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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON

Alain Hensley

Plaintiff(s),

v.
TD AMERITRADE, INC.
TD AMERITRADE, INC.,
WATERHOUSE SECURITIES, INC.,
TD WATERHOUSE INVESTOR
SERVICES, INC., TD WATERHOUSE
INVESTOR SERVICES, INC.

GTS EQUITY PARTNERS LLC GTS EXECUTION SERVICES LLC GTS SECURITIES LLC GLOBAL TRADING SYSTEMS, GTS SECURITIES LLC, GTS MISCHLER

CHARLES SCHWAB & CO., INC. SCHWAB HOLDINGS, INC.

FINANICAL INDUSTRY REGULATORY AUTHORITY "FINRA"

And dose 1-100 Inclusive,

Defendant(s)

CASE NO. 23 CU 5/59 DGE
[to be filled in by Clerk's Office]

COMPLAINT FOR A CIVIL CASE

Jury Trial:

✓ Yes

✓ No





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	Pro Se 1 2022	
1	Defendant No. 3	
2		CHARLES SCHWAB & CO., INC.,
3	Name	SCHWAB HOLDINGS, INC.
5	Job or Title (if known)	
4	Street Address	211 MAIN STREET
5	City and County	SAN FRANCISCO
6	State and Zip Code	CA 94105
_	Telephone Number	(415)-636-7000
7		
8		
9	Defendant No.4	
10		FINANICAL INDUSTRY REGULATORY
11	Name Job or Title (if known)	AUTHORITY "FINRA"
12	Street Address	1735 K Street, NW
13	City and County	
14	State and Zip Code	Washington, DC 20006
15	Telephone Number	(202) 728-8000
16		*
17	The plaintiff Alain Hensley is a citizen of the county of Pierce within the State of	
18	Washington.	
19	The Defendant(s) TD AMERITRADE, INC. TD AMERITRADE, INC.,	
20	WATERHOUSE SECURITIES, INC., TD WATERHOUSE INVESTOR SERVICES, INC., TD	
21	WATERHOUSE INVESTOR SERVICES, INC. is incorporated under the laws of the State of	
22	Delaware and has its principal place of business in the State of Nebraska.	
23	GTS EQUITY PARTNERS LLC GTS EXECUTION SERVICES LLC GTS	
24	SECURITIES LLC, GLOBAL TRADING SYSTEMS, GTS SECURITIES LLC, GTS	



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MISCHLER is incorporated under the laws of the State of Delaware, and has its principal place of business in the State of New York

CHARLES SCHWAB & CO., INC. SCHWAB HOLDINGS, INC. is incorporated under the laws of the State of Delaware and has its principal place of business in the State of California.

FINRA

AND DOSE 1-200, INCLUSIVE

Statement of Claim

- 1. Plaintiff is a owner of Meta Materials shares ("MMAT") as well as the class A preferred shares ("MMTLP"). The MMTLP shares were offered by TD Ameritrade Holding Corporation, TD Ameritrade, Inc., TD Ameritrade Clearing, Inc., TD Ameritrade Investment Management, LLC, or any corporate parent, corporate subsidiary, or employee of the same and The Charles Schwab Corporation or any corporate parent, corporate subsidiary, or employee of the same in 2022 and prior.
- 2. Plaintiff is informed, believes, and thereon alleges that Defendants were negligent and failed in their fiduciary duty to Plaintiff by failing to ensure that Defendant's securities were genuine registered certificates. Plaintiff also alleges, along with other parties in the Financial Industry, including on information and belief GTS and Market Makers who illegally created, shorted, traded, synthetic, counterfeit, unregistered, and unauthorized share certificates as well as fraudulently concealing the fact that they did not have the authentic, registered share certificates in their possession, MetaMeterials, Inc. had been subjected to a corporate hijacking by fraudsters with the assistance of The Defendants, and that Defendants knew that the fraud had compromised the DTCC depository.



They are choosing to misrepresent it and cover this up, thereby intentionally harming the interests of retail investors. Plaintiff asserts a variety of federal and state, civil, and criminal claims and seeks prohibitive injunctive relief, monetary settlement, and punitive damages. Plaintiff requests that the Court enjoin such unethical and illegal conduct.

- 3. On about June 28, 2021, Torchlight Energy Resources merged with and became MetaMaterials ("MMAT"). MMAT is the maker of nanocomposite materials. Subsequently, additional shares were issued as preferred MMTLP shares which eventually brought us to Next Bridge Hydrocarbons ("NBH"). Without the entity's consent, Market Makers traded MMTLP and flooded the marketplace with unlawful securities. Although the Approximate sum of 165,000,000 shares were to be issued in MMTLP to go into NBH, in order to maximize their profits, and with the assistance and consent of Defendants knowingly, with full knowledge and contrary to the law, allowed Market Makers to sell and market false, nonexistent and illegal shares to the public including Plaintiff herein. The illegal shares were utilized to reduce the stock price of MMTLP On, to harm the interests of retail investors and Plaintiff, and to create an environment where the stock market was not operating per law or fairly.
- 4. On information and belief, Defendants and market makers, always relevant herein, acted with the intention to harm retail investors. Defendant has been doing business within Pierce County since the issuance of the shares and until today. Plaintiff does not know the true names, capacities, or basis for liability of Defendants sued herein as Does 1-200, inclusive, as each fictitiously named Defendants is in some manner liable to Plaintiff. Plaintiff will amend this Complaint to allege their true names and capacities when ascertained. Plaintiff is informed and believes, and thereon alleges, that at all relevant times mentioned in this Complaint, each of the fictitiously named Defendants are responsible in some manner for the injuries and damages to



DOCKET

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