

**GENTECH HOLDINGS, INC. [GTEH]**

November 30, 2021

John Fieldsend  
Sean Harrison  
Office of Rulemaking  
Division of Corporation Finance  
U.S. Securities and Exchange Commission  
100 F Street NE  
Washington, DC 20549

VIA ELECTRONIC MAIL Re: Release Nos. 33-10911; 34-90773; File No. S7-24-20

As the CEO of a small public company that trades on the OTC Markets, I fully support the commissions efforts to recharacterize Rule 144 to stop what is known on the OTC Markets as a “death spiral” funding. The ability for any lender to wait the current 180 period before it can re-sell securities has devastated hundreds of OTC companies as serial sales of stock, after the initial 18- day waiting period, causes severe shareholder dilution. The current “tack back” provision harms small public companies like ours because it creates a scenario where there is no investment intent, but rather simply, a short-term loan that gets repaid with the company’s stock after 18 days.

Most, if not all these toxic funders funders start selling within a few days after holding for 180 days and many of these funders convert and sell out within a matter of weeks, not caring at all whether they make money on a company’s stock appreciation through the hard work of a company’s management team. Their intent is to solely take advantage of the current statute to make money based on their conversion discount.

Thank You

A handwritten signature in black ink, appearing to read "D. Lovatt". The signature is written in a cursive style with a horizontal line underneath the name.

David Lovatt, CEO.