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UNITED STATES OF AMERICA Before the SECURITIES AND EXCHANGE COMMISSION

In the Matter of

MYRIAD INTERACTIVE MEDIA, LLC.

RECEIVED JAN 07 2015 OFFICE OF THE SECRETARY

Administrative Proceeding File No. 3-16317

INFORMATION BEFORE THE COMMISSION AT THE TIME OF THE TRADING SUSPENSION

Pursuant to the Commission's Order Requesting Additional Written Submissions regarding In the Matter of Myriad Interactive Media, LLC ("Myriad"), the Division of Enforcement has attached the affidavit of Rebecca Israel setting forth the substantive facts before the Commission at the time of the trading suspension in the securities of Myriad. The affidavit does not disclose privileged analysis or sensitive information about the staff's investigative methods.

By its attorneys,

Deena R. Bernstein Senior Trial Counsel

Rebecca Israel

Senior Counsel

Securities & Exchange Commission

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UNITED STATES OF AMERICA Before the SECURITIES AND EXCHANGE COMMISSION

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In the Matter of

MYRIAD INTERACTIVE MEDIA, LLC, Administrative Proceeding File No. 3-16317

AFFIDAVIT OF REBECCA ISRAEL

I, Rebecca Israel, hereby swear:

- 1. Since October 2014, I have been employed as an enforcement attorney with the U.S. Securities and Exchange Commission (the "Commission") in the Boston Regional Office in the Division of Enforcement ("Division"). My duties include conducting investigations related to potential violations of the securities laws. I was the lead investigator for the Division in this matter.
- 2. On November 18, 2014, the Division provided the following information to the Commission in support of the issuance of the Trading Suspension Order temporarily suspending trading in the securities of Myriad Interactive Media, LLC ("Myriad"), ticker symbol "MYRY." The Division did not have other communications with the Commission concerning the factual basis in support of the issuance of the Trading Suspension Order.
- 3. Myriad is a Delaware corporation with its principal place of business in Toronto, Canada. Myriad is a company purportedly engaged in developing "corporate websites, enterprise applications and mobile apps."
- 4. In the past year alone, Myriad has represented that it is involved in the Bitcoin "world" and the "marijuana sector," but now claims to be developing an "Ebola tracking app."

Prior to its purported involvement in Internet technologies, Myriad (originally incorporated in Nevada in 1990 under the name "Investor Club of the United States") operated under seven different corporate names and cycled through several business plans. The company's common stock has been registered pursuant to Section 12(g) since February 26, 2000 when the Form 10-12G filed in December 1999 by Myriad's predecessor (Planet411.com, Inc.) became effective.

5. Myriad's common stock (ticker "MYRY") is quoted on the OTC Pink marketplace on OTC Link operated by OTC Markets Group, Inc. As of October 31, 2014, Myriad's securities had eleven market makers and were eligible for the "piggyback" exception of Exchange Act Rule 15c2-11(f)(3).

Myriad's Purported Business Plans and Poor Financial Condition

- 6. In the past year alone, Myriad has represented that it is involved in the Bitcoin "world" and the "marijuana sector," but now claims to be developing an "Ebola tracking app." Myriad also announced in April 2014 that it had formed a "gaming" division to develop a smartphone game that it said was similar to the popular mobile game Candy Crush Saga.
- 7. Since the current CEO, Derek Ivany, took over in 2005, the company has cycled through the names "Ivany Mining Inc.," "Ivany Nguyen Inc.," and finally became "Myriad Interactive Media Inc." in July 2011. Myriad currently bills itself as an "interactive marketing and development firm" and describes its business as "focused on building in house applications and technologies that the company wholly owns and can drive revenue streams."
- 8. Myriad's Form 10-K filed on October 22, 2014, for the fiscal year ended June 30, 2014, reveals that Myriad has accumulated a deficit of \$13,120,993 since its inception and that Myriad's auditors have substantial doubt that Myriad will be able to continue as a going concern. The Form 10-K notes that Myriad's ability to pursue any significant business development

activities is dependent on further financing and that it currently does not have any "firm arrangements for the required equity financing." Myriad also stated in its Form 10-K that it would "not be conducting any product research or development during the next 12 months."

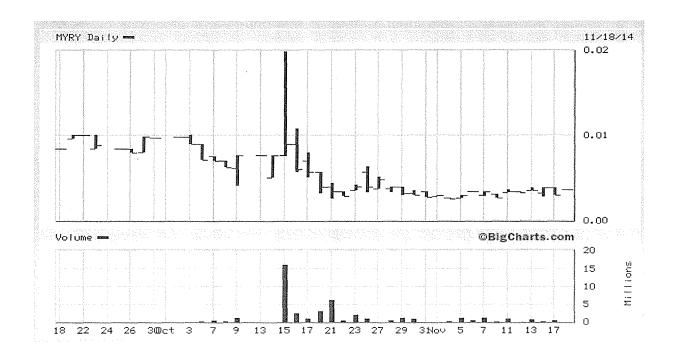
9. Despite the dire condition reported in its 10-K, Myriad has been issuing press releases, both before and after its Form 10-K filing, that tout a "fully fund[ed]," "state of the art Ebola tracking system" project that is "in development mode."

Myriad Issued Misleading Press Releases about an "Ebola Tracking System" and a Purported Contract with "Mouse LLC" and Immediately Experienced a Trading Spike

- 10. In an October 15, 2014 press release, Myriad claimed that it "ha[d] been retained by Mouse LLC to develop a new Ebola tracking system." According to the release, Myriad "signed a contract with Mouse, LLC that will fully fund the project . . . [and] will earn 15% in royalties from any or all revenue sources that are developed from the application." CEO Ivany stated that "the company has already initiated design and development" and that "[t]he Ebola tracking system will have several unique features that we cannot reveal at this time because of trade secrets."
- 11. Myriad's claims are, at a minimum, misleading in light of the disclosures in its filings regarding Myriad's inability to pursue development and the significant doubts about its viability. When one reads carefully through the "Mobile App Design Agreement," contract with Mouse LLC that was attached to the Form 10-K, the misleading nature of the statements become even more apparent.
- 12. First, the contract that Myriad alleged "will fully fund" the project and grant Myriad 15% royalties actually provides for a one-time payment of only \$2,000 and contains no mention of royalty payments.

- 13. Second, the contract provides that Myriad "will not own any rights to any designs related to the disease tracking (DTE) platform," and that ownership, copyright, and publishing rights to the website design project "belong to Mouse LLC as of October 5, 2014." The allocation of ownership in the contract would likely be of interest to investors in a company that describes itself as a firm that "has developed several in house technologies which are 100% owned and operated by [Myriad]."
- 14. Myriad alleged in its October 24, 2014 press release that it had "divested itself" of its Bitcoin stock tracking website at a "substantial premium" (despite having announced the launch of this project just seven months prior as an "additional revenue source for the company, which would be generated primarily in the form of advertising.").
- 15. The October 15, 2014 press release similarly contained an announcement that Myriad had sold its "CryptoCafe.com Bitcoin platform" also to Mouse, LLC because "Myriad has shifted focus to a handful of strategic projects and the Crypto Currency space is not one of our main focuses at this time."
- 16. Additionally, Myriad touted its "fully funded" contract without disclosing the fact that the contract was with a related party entity; Alan Sosa, currently the largest shareholder of Myriad at 13% ownership, is the principal of Mouse LLC, a Virginia corporation created in September 2014.
- 17. As Mouse has virtually no internet presence or publicly available records, the information about insider ownership, the paltry funding, and the nonexistent royalty provisions was not available to the investing public until Myriad filed its Form 10-K on October 22, 2014, well after the October 15, 2014 press release had made its market impact, as detailed below.

- 18. On October 15, 2014, Myriad's trading volume increased to over 16 million shares and closed at \$0.009 per share.
- 19. For the three months prior to October 15, Myriad's daily trading volume had consistently been below 500,000 (with the exception of an unexplained bump from October 7 through October 9, when the trading volume reached 1.3 million shares). During the same three-month period, Myriad was the subject of three penny stock touts identified by the staff.
- 20. After October 15, the share price fell, reaching a low of \$0.0029 and closing at \$0.003 per share on October 22, 2014, the day that the Form 10-K was filed.
- 21. A chart reflecting the price and volume fluctuations for Myriad during the past two months is included below.



22. Even after the October 22 filing of the Form 10-K that called into question many of the statements in the October 15 press release, Myriad continued to disseminate the same misleading claims about the Ebola tracking app to the investing public.

- 23. On October 24, 2014, Myriad issued another press release that included an "Ebola Tracking System Project Update," in which Ivany was quoted, claiming "we have completed the majority of critical designs required to begin coding . . . [w]e are now in development mode on the app and are moving at full speed."
- 24. Given Myriad's disclosures in its Form 10-K about its inability to engage in product development over the next twelve months, it is unclear what Ivany could possibly be referring to here. Further, the only relevant contract with Mouse LLC that was attached to the Form 10-K was extremely limited in duration (stating that it "continues through the 20th of October, 2014, at which point all Work is expected to be completed to [Mouse LLC's] satisfaction"). Thus, there is inadequate information to assist investors in verifying these claims.

Association with Curt Kramer and Earlier Pump and Dump in January 2014

- 25. Curt Kramer, a notorious promoter and provider of "toxic" microcap financing, controls Asher Enterprises, Inc., with whom Myriad entered into several convertible promissory notes for a total of \$107,500. The last of these notes was due on February 12, 2014. Kramer is known as a "toxic" financier because of the onerous terms habitually associated with his provision of capital, such as high-interest loans that he can convert into stock at deep discounts to market price.
- 26. In November 2013, the SEC announced a \$1.4 million settlement with Kramer and his promotion firms (Mazuma Funding Corporation and Mazuma Holding Corporation) for violations of Sections 5(a) and 5(c) of the Securities Act. *See* SEC Release No. 9485. Kramer has also been the subject of numerous FINRA referrals, and FINRA also recently denied an issuer's application for a 1-for-2,000 reverse share split because of its association with Kramer and Asher (to whom the issuer, EcoloCap, had sold convertible notes in 2013).

- 27. In December 2013 and January 2014, Myriad made numerous announcements about purported business plans related to Bitcoin and was actively promoted by two stock promotion entities named "Best Damn Pennies" and "Wall St. Cheat Sheet." Myriad's share price and trading volume correspondingly ballooned for the duration of the promotional activity, while Asher Enterprises sold about 25.7 million Myriad shares for proceeds of approximately \$311,000 over the same time period. Immediately thereafter, on January 17, 2014, Myriad issued a press release stating that it had "eliminated all Asher enterprises debt from the company."
- Whereas in the three months prior to December 10, 2013, Myriad's share price fluctuated between \$0.002 and \$0.012, and its average daily trading volume was roughly 300,000 shares, Myriad's share price shot up between December 10, 2013 (the date of the first Bitcoin-related press release) and January 15, 2014, fluctuating between \$0.04 and \$0.68. On January 14, 2014, FINRA staff scheduled an interview with CEO Ivany to discuss Myriad's financial conditions and operations but Ivany does not appear to have responded to FINRA's repeated requests for information.

Conclusion

29. A trading suspension is warranted because, among other factors, Myriad misrepresented its funding agreement and failed to disclose the related party information in its October 15 press release, which was followed by a spike in trading volume and share price, and continued to make similar misleading statements in its October 24 press release. Viewed in light of its actions over the past year, Myriad appears to be engaged in an active and ongoing campaign to pump up the price and volume of its securities through a number of suspicious or

materially misleading claims in press releases, including a recent focus on the Ebola crisis after earlier attempts to capitalize on the popularity of Bitcoin and medical marijuana.

Rebecca Israel

Senior Counsel

Securities & Exchange Commission

33 Arch Street, 23rd Floor

Boston, Massachusetts 02110

(617) 573-4582

On Jem 5th, 2015,

Robecca Jorael, a person known to me,

Dated: //5//S

personally appeared before me and swore under oath the foregoing Affidavit.

Notary Public

Commission expires:

STEPHANIE DESISTO

Notary Public

Commonwealth of Massachusetts
My Commission Expires

April 9, 2015



UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Boston Regional Office 33 Arch Street, 23rd Floor Boston, MA 02110 Telecopier: (617) 573-4590

ENFORCEMENT DIVISION

Deena Bernstein Senior Trial Counsel (617) 573-8813

January 5, 2015

By FACSIMILE AND UPS

Brent Fields, Secretary Office of the Secretary U.S. Securities and Exchange Commission 100 F Street, NE Washington, DC 20549 RECEIVED

JAN 07 2015

OFFICE OF THE SECRETARY

Re:

In the Matter of Myriad Interactive Media, Inc. Administrative Proceeding File No. 3-16317

Dear Mr. Fields:

Enclosed for filing in the above-referenced administrative proceeding, please find an original and three copies of the filing entitled "Information Before the Commission at the Time of the Trading Suspension."

Thank you for your attention to this matter.

Very truly yours,

Deena Bernstein Senior Trial Counsel

Enclosure

cc: Service List