

May 13, 2005

There is a crisis facing the OTC market today in the lack of short sale position reporting and disclosure for OTC issues. This lack of transparency regarding short selling in the OTC market allows fraudulent acts to go undiscovered and manipulative short sellers to hide.

I believe regulators should fix the problem. Small issuers traded on the Pink Sheets and the OTCBB deserve the same transparency and regulatory oversight of short selling as those listed on Exchanges or NASDAQ.

Therefore, Pink Sheets has petitioned the SEC to cause the amendment of NASD Rule 3360 and require NASD broker dealers to maintain a record of total "short" positions in all customer and proprietary firm accounts in all publicly traded equity securities as well as report this information to the NASD for public dissemination of the short positions by security. The SEC's action is urgently needed to prevent fraudulent acts, expose market manipulation, promote fair principles of trade and protect investors.

A change request is available for you to read at:
<http://sec.gov/rules/petitions/petn4-500.pdf> and comments by other concerned OTC market participants are available at:
<http://sec.gov/rules/petitions/4-500.shtml>

This issue is particularly important to me as one company I have invested in, CMKM Diamonds (symbol CMKX) is embroiled in litigation partially due to the manipulation and possible naked short selling of its stock.

Respectfully sent,

Sergio Chavez