

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

ADMINISTRATIVE PROCEEDINGS RULINGS
Release No. 4642/February 28, 2017

ADMINISTRATIVE PROCEEDING
File No. 3-17551

In the Matter of

MED-X, INC.

ORDER GRANTING MOTIONS TO
CORRECT HEARING TRANSCRIPT

The hearing in this proceeding was held on January 10 and 25, 2017. On February 17, 2017, the parties submitted separate motions proposing transcript corrections. *See* 17 C.F.R. § 201.302(c). Thereafter, each party withdrew certain proposed corrections and stated it had no objections to the other side's remaining proposed corrections.

I GRANT the parties' respective motions to correct and ORDER that the parties' proposed corrections are adopted as attached, with a few minor modifications. The court reporter is requested to issue a complete, amended hearing transcript. The amended transcript should also be provided in electronic format to my office.

Jason S. Patil
Administrative Law Judge

Division of Enforcement's Proposed Changes

Date Taken: January 10, 2017	Witness: Sebastian Gomez Abero	
Page	Line	Change
12	5	change "Hogan Law Office" to "Hogan Lovells"
12	22	strike "of"
13	3	change "of" to "to"
14	3	change "exception" to "exemption"
14	6	change "was that" to "was it in"
14	13	strike "of office"
15	20	change "exceptions" to "exemption"
15	21	change "exception" to "exemption"
15	23	change "exception" to "exemption"
22	16	insert space between "Form" and "1"
23	15	strike "or"
25	20	change "issue" to "issuer"
27	20	change "the" to "then"
29	25	change "is the" to "is this"
31	17	change "issue" to "issuer"
32	20	change "issue" to "issuer"
33	13	change "()" to "(F)"
33	16	change "Rule 257" to "Rule 257(b)"
33	17	insert closing quotation mark after "sale."

34	23	change “identified” to “he identified”
36	15	change “Murphy” to “O’Rourke”
40	11	change “and” to “on”
42	19	change “on” to “in”
44	21	change “it” to “is”
47	17	change “Hensler” to “Henseler”
48	4	change “Hensler” to “Henseler”
48	19	insert “day” after “120”
50	15-16	change “was it” to “it was”
58	6	change “facts” to “factors”
58	13	change “base” to “scienter based”
59	1	change “first the” to “the first”
64	8	change “disqualification” to “qualification”
72	22	change “issue” to “issuer”
76	12	change “tis” to “this”
79	6	change “be made” to “make it”
79	17	insert “in” after “with”
82	25	change “16” to “9-A”
89	8	change “Hensler” to “Henseler”
89	24	change “Hensler” to “Henseler”
91	6	insert opening quotation mark before “if”
91	7	change “of Commission” to “the Commission”

91	8	insert “;” after “undersigned”
91	9	change “Hensler” to “ Henseler”
91	9	insert closing quotation mark after “Abero.”
91	16	change “Hensler” to “ Henseler”
92	5	change “Hensler” to “ Henseler”
92	24	change “qualified” to “qualified for”
94	16	change “Terms, Conditions, or Requirements” to “ Term, Condition, or Requirement”
96	13	change “ruling” to “referring”
101	9	change “wit” to “with”
104	23	insert comma after “insignificant”
104	24	change “should be” to “should not be”
106	9	change “company” to “Commission”
108	7	change “wouldn’t it” to “it wouldn’t”
133	15	insert “the” after “was”
134	18	strike “because” after “it’s”
137	14	strike “it”

Date Taken: January 25, 2017	Witness: Christopher Reilly	
Page	Line	Change
143	2	insert "do" after "you"
145	5	change "calculation" to "calculations"
145	5	change "was" to "were"
146	16	insert "dotted" after "that"
147	6	insert "a" before "series"
147	11	change "investment" to "investments"
150	5	insert "of" after "percent"

Date Taken: January 25, 2017	Witness: Gerald Laporte	
Page	Line	Change
197	22	strike “,” and “a” after “essentially”
197	22	insert “it” after “violate”
198	13	insert “an” after “without”
199	24	insert opening quotation mark before “the”
200	1	insert closing quotation mark after period
201	3	insert comma after “Company A”
201	4	insert comma after “to you”
201	5	change comma after “A+” to semicolon
201	12	insert semicolon after “done”
202	7	strike “D”
202	10	change “D (3)” to “(d)(3)”
203	17	change “number ‘I’” to “numeral (i)”
203	17	insert semicolon after “capital ‘F’”
204	6	change “filing” to “filings”
207	13	insert “is” after “this”
207	25	change “line” to “dots”
209	17	change “16(a)” to “16-A”
209	23	insert “a” after “it’s”
209	24	insert “a” after “have”

210	10	insert “not” after “are”
211	7	change “5” to “I”
211	15	change “filing” to “filings”
211	15	insert opening bracket and quotation mark before “aggravating”
211	16	insert closing bracket and quotation mark after “circumstances”
211	17	insert closing quotation mark after “purpose.”
217	23	strike “to”
218	23	change “violation” to “violations”
225	16	change “you” to “your”
228	20	change “A-2” to “(a)(2)”
228	22	insert “was” after “reg”
228	23	insert comma after “Commission”
228	23	change “Right” to “right”
229	2	strike opening quotation mark
229	13	change “is” to “does”
229	17	insert comma after “believes”
229	18	change “Rule 251 D(3)” to “Rule 251(d)(3)”
239	3	change “Jay” to “J.”

Date Taken: January 25, 2017	Witness: Mark Richardson	
Page	Line	Change
255	16	change "Jurzowski" to "Tchorzewski"
266	6	change "key" to "keyed"
268	9	change "the" to "T"
277	8	change "Jurzowski" to "Tchorzewski"
281	23	change "Hensler" to "Henseler"
282	18	change "Hensler" to "Henseler"
284	5	change "Hensler" to "Henseler"

Date Taken: January 25, 2017	Witness: Matthew Mills	
Page	Line	Change
297	13	change "raise" to "raised"
298	5	change "raise" to "raised"
298	15	insert "you" after "did"
299	25	change "your" to "you"
300	9	change "taped" to "tapered"
301	4	change "we'd" to "we"
306	15	insert comma after "asking"
307	6	insert "said" after "also"
307	21	change "that" to "than"
308	15	insert a period after "filings"
308	15	capitalize "b" in "but"
308	15	insert "about" after "much"
312	16	change "we" to "were"
315	18	insert opening quotation mark before "cold"
315	19	insert closing quotation mark after "called"
315	21	insert opening and closing quotation marks for "cold called"
321	23	change "cold called" to "cold-called"
321	25	insert single opening and closing quotation marks for 'Pre-IPO'
322	3	change "sell" to "sells"
322	7	change "the sale" to "sale the"

322	8	insert closing quotation mark after “resident”
322	11	change “operation” to “operations”
322	13	insert single quotation mark before “what”
322	14	insert single quotation mark after “opportunity,”
322	15	change “no-brain er” to “no-brainer”
324	11	change “?” to period
325	20	change “incident” to “incentive”
325	21	insert opening and closing quotation marks for “cold call”
329	13	insert “this” after “Is”
329	16	insert “the” after “is”
330	8	change “product” to “products”
330	12	change “district” to “distribute”
330	13	insert “to be” after “products”
330	14	change “Gen” to “Jen”
330	14	change “GenX” to “Jen-X”
330	14	change “distribute” to “distributes”
330	18	change “a” to “an”
330	19	change “and” to “/”
331	4	change “cold calling” to “cold-calling”
331	6	change “offerers” to “offered”
331	6	insert “or” before “sold”
335	9	insert “a” before “number”
335	22	change “herein” to “therein”

Respondent's Proposed Changes

Testimony of Gerald J. Laporte

Page: line	Current	Should be
157:13	“nominated, the commissioners”	“nominated as commissioners”
159:14-15	“small reporting”	“smaller reporting”
160:9-10	“order of certain kinds were disqualified”	“orders of certain kinds were disqualifying”
161:12	“Title A”	“Title 4”
166:8	“Boggs & Low”	“Boggs & Blow”
166:10	“eight a half”	“eight and a half”
174:21	“there’s enforcement”	“there’s no enforcement”
187:20-21	“but you can what’s called Rule 506(b). You can”	“but under what’s called Rule 506(b) you can”
187:23	“investors as long as – general”	“investors and use general”
191:2	“It’s has in”	“It says in”
192:14	“got-you rule”	“gotcha rule”
192:16	“got-you rules”	“gotcha rules”
198:9	“our Division director”	“our Deputy Division Director”
204:21	“hands securities”	“hand securities”
204:25	“when I they”	“when they”
205:1	“continuous or self-registration”	“for continuous or shelf registration”
205:7-8	“a billion dollars of shelf”	“billion dollar shelf”

214:14	“the afterward market”	“the aftermarket”
215:21	“I’m sorry. The charts, are we”	“I’m sorry. What charts are we”
216:11	“to Regulation A offerers”	“to a Regulation A offering”
224:1	“laughe”	“laughed”
224:13-14	“It’s an theoretical option, especially these”	“It’s a theoretical option, especially for these”
224:21-22	“times million”	“times more million”
224:23	“theoretically option”	“theoretical option”
239:21	“been used”	“been revised”
241:19	“registration exemption”	“registration revocation”

Testimony of Mark Richardson, Esq.

Page: line	Current	Should be
244:17	“To the”	“The laws”
252:13	“and eligibilities”	“and eligibility”
253:5-6	“distribution between the main section of where”	“distribution in the main section where”
255:15-16	“from. Med-X 1 E-mail from Ron Jurzowski”	“from Ron Tchorzewski”
260:14	“2016”	“2017”
268:9	“When the read”	“When I read”
269:3	“the day before”	“the Friday before”
277:8	“Jurzowski”	“Tchorzewski”

Testimony of Matthew Mills

Page: line	Current	Should be
287:17-18	“were hoping to be done in a sooner time the Regulation A+ of the JOBS Act and”	“were hoping would be done more quickly -- Regulation A+ of the JOBS Act – and”
289:13	“day where people who partake using Cannabis on”	“day when people using Cannabis partake in”
290:15	“investor”	“investors”
291:15	“With advertising, like other”	“Like with advertising, other”
295:2	“going this”	“going through this”
295:25	“2015”	“2016”
309:10	“to go and”	“to get”
336:1	“herein”	“in the Order”