

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

Administrative Proceedings Rulings
Release No. 5681 / April 11, 2018

Administrative Proceeding
File No. 3-18325

In the Matter of
Global Digital Solutions, Inc.

**Order for Supplemental
Evidence and Briefing**

On April 9, 2018, I held oral argument to address the Division of Enforcement's motion for summary disposition, Respondent's opposition, and the Division's reply. Respondent's position, in its opposition and during oral argument, is that summary disposition is inappropriate because there are disputed, genuine issues of material fact regarding the public interest factors used to determine whether to revoke the registration of Respondent's registered securities. *See Opp.* at 3-5; 17 C.F.R. § 201.250(b). Respondent has evidenced such disputes with affidavits, including one from Respondent's new CEO. *Opp.*, Ex. B. In addition to facts disputed in the affidavit, *e.g.*, *id.* ¶¶ 13-14, 17(a)-(c), the CEO identified additional material evidence that will be available by the end of May 2018. *Id.* ¶¶ 18-19 (referring to schedule for filing delinquent reports and paying off settlement with Commission).

By June 1, 2018, Respondent shall file an affidavit attaching all such evidence, along with any other evidence then available that supports its position that genuine issues of material fact are in dispute. Respondent's filing shall be accompanied by a brief of no more than five pages discussing the significance of that evidence to its opposition. By June 15, 2018, the Division shall file a brief of no more than five pages addressing Respondent's submission and, if circumstances warrant, may attach any relevant evidence. If the Division submits new evidence, Respondent will have until June 22, 2018, to submit a reply of no more than 5 pages.

Jason S. Patil
Administrative Law Judge