

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

Administrative Proceedings Rulings
Release No. 5788 / June 11, 2018

Administrative Proceeding
File No. 3-18492

In the Matter of

**Play La Inc. and
Titan Trading Analytics, Inc.**

**Order Regarding Service
and Postponing Hearing**

On May 17, 2018, the Securities and Exchange Commission issued an order instituting proceedings (OIP) against Respondents pursuant to Section 12(j) of the Securities Exchange Act of 1934, alleging that each Respondent has securities registered with the Commission and is delinquent in its periodic filings. A hearing is scheduled for June 12, 2018.

On June 7, 2018, the Division of Enforcement submitted a declaration regarding service of the OIP on Respondents. Play La Inc. is a British Virgin Islands corporation. The Division sent the OIP to Play La by UPS. Delivery was attempted, but the package was refused on May 25, 2018. This attempted service is not one of the methods authorized for international service by 17 C.F.R. § 201.141(a)(2)(iv). It fails under (iv)(A) because attempted delivery is only effective when the OIP is sent by “U.S. Postal Service certified, registered, or Express Mail.” *See id.* § 201.141(a)(2)(ii). It does not satisfy (iv)(B) because the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents does not “affirmatively *authorize*[] service by mail”—it merely does not interfere with the freedom to serve process through postal channels. *Water Splash, Inc. v. Menon*, 137 S. Ct. 1504, 1513 (2017); *see Brockmeyer v. May*, 383 F.3d 798, 804 (9th Cir. 2004) (holding that service by mail is not an “internationally agreed means reasonably calculated to give notice, such as those means authorized by the Hague Convention”). It does not qualify under (iv)(C) because there is no evidence this method is “prescribed by” Virgin Islands law and there was no

letter rogatory or “delivery.” Finally, (iv)(D) is not satisfied because there was no order by the Commission or hearing officer authorizing this method.¹ The Division should attempt to serve Play La by one of the methods in Rule 141(a)(2)(iv)(A)-(D).

The Division’s declaration, however, establishes that Titan Trading Analytics, Inc., was served on May 29, 2018, by U.S. Postal Service Priority Mail Express International attempted delivery at its most recent address on its most recent filing with the Commission. 17 C.F.R. § 201.141(a)(2)(ii), (iv)(A). Titan Trading’s answer is due today, June 11, 2018. OIP at 3; 17 C.F.R. § 201.160(b).

I ORDER that the hearing scheduled for June 12, 2018, is POSTPONED. A telephonic prehearing conference will be scheduled once the Division supplies evidence of service on Play La.

Brenda P. Murray
Chief Administrative Law Judge

¹ Prior to the 2016 amendments to the Rules of Practice, service on Play La may have been effective because Rule 141(a)(2)(iv) allowed service “by any other method reasonably calculated to give notice, provided that the method of service used is not prohibited by the law of the foreign country.” The amendments added more specific requirements.