Detailed Responses and Comments to the Proposed Plan (Administrative Proceeding File Number 3-20537)

“Reality is not a function of the event as event, but of the relationship of that event to past, and future, events.” — Robert Penn Warren

“The frame, the definition, is a type of context. And context, as we said before, determines the meaning of things. There is no such thing as the view from nowhere, or from everywhere for that matter. Our point of view biases our observation, consciously and unconsciously. You cannot understand the view without the point of view.” — Noam Shpancer

Before I jump to detailed responses to the unfairness of this Proposed plan, there are two things I must make it very clear here.

Firstly, as we all know that no one can judge a thing without knowing its context. I cited two famous quotes above to explain this. As I read through the 20 pages of the Proposed Plan, my first impression is that the Plan is totally OUT OF CONTEXT. If I just let it go like this way, the ignorance of the potential threats imposed by the transnational criminal organizations of the Chinese communist party (CCP), could not only directly lead to the death threats of 5000+ investors and their families, but also could put the authority and hardly earned credits of U.S. government agencies or country as whole in great danger.

Before GTV was launched publicly, even as we go back to the G-media times after the whistleblower movement funder and leader Miles Guo was permanently banned from Twitter, these platforms have one central duty, that is to continue to expose the criminal activities of the transnational criminal organization of CCP, which have been undertaken for decades not only inside of china but also around the world, including the USA. From February of 2017 till now, it’s more than five years, and there are thousands and thousands live streamed videos from these freedom fighters of the Chinese whistleblower movement have been recorded and published. As one tiny part of the mass followers from this movement, I have witnessed by myself about the hacker’s attacks on these platforms, and the abuses of political power of CCP on either the leader of this movement or its influential followers. Although five years has proven most of the information released by the whistleblower movement is 100% correct, with a large amount of these information I could also verified by myself with public available information. At the meantime, I also witnessed how the Big-Techs like YouTube, Twitter, Facebook, google are censoring these true informations. On top of all these facts, the Commission should also know that the CCP has been designated and confirmed by two U.S. administrations that this evil regime has committed genocide and a crime against humanity on Uyghurs and other ethnically Turkic minorities in Xinjiang. The evil deeds and crimes committed by the communists can trace back to the soviet-union times, the east Germany until today’s North Korea, Cuba, Venezuela, Iran and the communist China.

Therefore, there is no reason for the Commission to treat this case as a normal commercial activity. Any kinds of personal information leaks could lead to whole assets freezing or even disappearance or death of the investors and their family members. From the perspective of an investor, I saw CCP is the biggest benefiter from the the Commission’s actions. For myself, I lost the trust from my family because they think I just lost all my savings. The unbearable risks of the CCP’s criminal threats, plus the Commissions year long actions and wrongly definitions of this investment is illegal is the last straw that ruined all my reputation and my family is completely broken, and my child is under 4 years old. I got lucky that the CCP is still not reach me, but I have heard there are many investors have been questioned or tortured by
the CCP because of the VOG’s representative Lihong Wei, who has infiltrated the whistleblower movement successfully, and who is leaking the VOG investors personal information to the CCP. Based on all these facts, I am personally urge the Commission have to take these CONTEXT into consideration, or else, leaking of information by returning the principal to the owners might directly lead to thousands of investors, their assets and their families in danger. I don’t worry so much about the securities of all investors including myself, because I can do nothing about it. But I do worry about the potential damage on the credit and public trust of the Commission and the U.S. government, in case leaking of personal information caused mass arrest and murder by the evil CCP really happens after the Plan starting to carry out.

Secondly, the Commission defined the GTV private placement as public traded common stock is 100% incorrect. This is not just a distort of the facts, but also a clear indication of power abuse. The image of rule of law and democracy could be shadowed by further misconducts.

The reasons are quite simple: First, public signalized information does not necessarily means the information are public information. For instance, we can not treat the public available radio or satellite signals as a public source of information, because some signals are encrypted. This is exactly what happened with the GTV private placement. I have never seen there are some public announcements on sales of GTV common stocks somewhere. I have been following the Chinese whistleblower moment from the day back to 2017 when it began until today for more than five years. Given that any kinds of direct contact with the founder of the Chinese whistleblower movement could lead to a family get arrested or disappeared, and live streaming the information can not be tailed or distorted, Miles Guo has chosen this public way to communicate with the ones who truly love china, and who truly want to save the Chinese people out of the hell created by the evil communist’s regime. But this public available information are encrypted by Miles. Until today a lot of information that Miles has delivered through the live streaming, nobody can interpreted it, and we are still waiting for Miles to unravel it one day. There’re lot of people, including the fellow fighter have been tired and continuing trying to unravel the message from Miles’s broadcasts, but no one has ever reach that goal till now. Second, Public traded Common Stocks does not require the eligibility for investing. While in the current case, everyone who can invest is strictly screened, and there are many live streamed video-proofs for that. Third, the GTV private placement is only offered to those who truly support the freedom and rule of law for Chinese, who has been following the Chinese whistleblower movement for longer time, and who has obtained the ability to interpret the encrypted information delivered by the whistleblower movements. Even with such a strict control and selection, the CCP’s infiltration is still inevitable. I have personally witnessed many person protected to be a freedom fighter and a true volunteer to this movement, but some of them showed their true faces already. In this case, the VOG representative Lihong Wei (Sara), and the ones who reported this private placement carried out inside of the whistleblower movement to the Commission are 100% the infiltration power from the CCP. The infiltration power is not just limited to the ones I have just listed here, there are many of them has been exposed in the last five years. I can personally prove all these people are not facts based, data based independent thinker, they’re lying and they are cheating, and they are humiliating the Chinese people and humanity. All what I have just said have internet records as proofs, so no one can deny that, and everyone can check that. The infiltration of CCP inside of this movement is continuing till now, we don’t know exactly how many of these bad guys are still inside of this movement. The whistleblower movement as I understand, has never asked something else, except the people are fact based, data based, and be a logical independent thinker. But unfortunately, some Chinese people are sold their souls to the CCP or whatever other reasons, they are continually refusing to verify the information that has been exposed, they have never been a truly support for freedom, rule of law and democracy. I
really don’t want to see the commission is misled by these cheaters and liars, which could further lead to the damage of the hardly earned credit and public trust that takes generations of U.S. patriots to build.

As a VOG investor, I have never seen and public offered detailed investment information from Miles Guo’s live broadcasting, I got this information from Lihong Wei, after I send her a request to be a consultant to VOG. I was so surprised and happy after I get a detailed investment as answer, because I has never thought I will be qualified for this investment. And I was surprised how could she choose to trust me, I was not in the core team of VOG, and actually I did nothing for the movement or VOG, I was just following and watching and discussing some exposed information with my friends and family. But now, after I know Sara has leaked personal information to the CCP, after I experience the bank rejected my transactions with no reasons, I just start to recognized this could be a trap set up for all Chinese freedom fighter from the very beginning. I really do not want to see the Commission will fall into this trap too. Due to all the facts I have just listed, GTV private placement is not a public offered common stock that everyone can buy, a false determination from the highly respected U.S. government agencies has already leaded to unbearable consequences for the 5000+ inverters. After I put all pieces puzzles together, further personal information leaking from and after the returning the principals to the owner investors, when there will be indeed some or most of investors get disappeared or their assets get locked, the commission will inevitably be treated as a part of the CCP’s evil plan in suppressing the freedom and democracy fight of the Chinese people. I deeply trust the rule of law and democracy of USA, I admired all the free Americans could live in such a beautiful country, I really trust the Commission can never be 100% manipulated or infiltrated by the CCP, but I really don’t want to see some bad actors who might be infiltrated by CCP personal decision will completely ruined the public trust and credit which is hardly earned by generations’ efforts.

My detailed response to the Proposed Plan are as following:

The Proposed Plan has authorized unlimited power to the fair fund administrator without objective and reliable supervision, and avoided to take any corresponding responsibilities at one hand. At the other hand the Propose Plan has required fully compliance and limitless duties of the investors, and deprived their basic rights for appealing. As one of the 5000+, first time in my life, I have felt what is real racial discrimination. I am asking myself, if these 5000+ investors are Americans or Europeans, dare some one to write a such unbalanced act? We are not seeking for compensation, we are here to ask to take our own money back, due to the commission has stopped these investments. All the money are the principals of the 5000+ investors who have invested VOG, GTV or G-dollar G-coin digital asset, we should never forget that.

I have subtracted some unfair part of the Proposed plan and marked them with different colors. Text with red color represents the unlimited power from that the Commission that is authorized to the fair fund administrator, text in blue are the duties for the investors or any others who claimed to be the owners of these assets, text in yellow marked who is using this assets to make profit and where the profit goes after. All words in bold regardless color show the key contents of corresponding statements.

53. Each Third-Party Filer must establish the validity and amount of each claim in its submission. Like all other Potential Claimants to the Fair Fund, Third-Party Filers must submit such supporting documentary evidence of purchases, dispositions, and holdings of Securities as the Fund Administrator deems necessary or appropriate to substantiate each individual claim. Without limitation, this includes the complete name of the Potential Claimant (beneficial account owner) and its TIN (for individuals) or EIN (for companies), sufficient contact information to confirm the identity of the beneficial owner, and documentation from the original bank, broker or other institution of purchases and dispositions of Securities (account statements,
confirmations and other documentation of purchases and dispositions), as well as holdings of the Securities on pertinent dates.

Documentation generated by the Third-Party Filer as well as affidavits in lieu of supporting documentation, will not be accepted unless, for good cause, the Fund Administrator determines it acceptable.

The Fund Administrator will have the right to request, and the Third-Party Filer will have the burden of providing to the Fund Administrator, any additional information and/or documentation deemed necessary by the Fund Administrator to substantiate the claim(s) contained in the submission.

Documentation from a Third-Party Filer that is not acceptable to the Fund Administrator will result in rejection of the affected claim(s).

The determination of the Fund Administrator to reject a claim for insufficient documentation, as reflected on the Final Determination Notice, is final and within the discretion of the Fund Administrator.

56. The Potential Claimant has the burden of notifying the Fund Administrator of a change in his, her or its current address and other contact information, and of ensuring that such information is properly reflected on the Fund Administrator's records.

63. The Fund Administrator will have the authority, in its sole discretion, to waive technical claim deficiencies and approve claims on a case-by-case basis, or in groups of claims. All determinations made by the Fund Administrator in accordance with the Plan in any dispute, request for reconsideration, or request to cure a deficient claim will be final and not subject to appeal.

71. Prior to the disbursement of any funds, the Fund Administrator will engage an independent third-party firm (“Third-Party Reviewer”), not unacceptable to Commission staff, to perform a set of agreed upon procedures, review a statistically significant sample of claims and ensure accurate and comprehensive application of the Plan of Allocation.

76. During the term of the Escrow Agreement, the portions of the Fair Fund transferred to the Escrow Account (the “Escrow Property”), shall be invested and reinvested in short-term U.S. Treasury securities backed by the full faith and credit of the United States Government or an agency thereof.

80. All interest, dividends, and/or income earned by the Escrow Property will accrue for the benefit of the Escrow Property. All Administrative Cost associated with the Escrow and Distribution Accounts will be the responsibility of the Fund Administrator, who may be reimbursed for said costs as provided in this Plan. No such Administrative Costs may be paid to the Bank, its agents, and/or its affiliates from the Escrow Property.

93. All Administrative Costs will be paid from the Fair Fund in accordance with the Commission’s Rules.

96. All funds remaining in the Residual that are infeasible to distribute to investors will be returned to the Commission and transferred to the U.S. Treasury after the final accounting is approved by the Commission. Returning such money to Respondents would be inconsistent with the equitable principle that no person should profit from his own wrongdoing. Therefore, in these circumstances, distributing disgorged funds to the U.S. Treasury is the most equitable alternative.
100. Once the Fair Fund has been terminated and funds, if any, are transferred to the U.S. Treasury, no further claims will be allowed and no additional payments will be made whatsoever.

I don’t want to repeat everything just clearly stated in the Proposed Plan, I just want to emphasize some key points here:

1) The proposed Plan authorized unlimited power for the fair fund administrator to seeking private information from all investors, and stated in the above subtracted text that the administrator’s decision is the final and we the investor have to follow that decision and have no rights even for appealing. Given the context of the G-serious investing background I have mentioned in the first paragraph, I have seen zero detailed measures of how the Commission and the fair fund administrator will protect the investors’ private information will be not leaked. And there is also nothing was written down in the Proposed Plan for the corresponding responsibilities the commission and the fair fund administrator for having a such unlimited power, in case any information will be leaked the evil CCP’s regime, which is confirmed as Genocide and Anti-Humanity criminals by two U.S. administrations. On the other hand, the investors has full burden to comply with the demand from the fair fund administrator, and has even no right to appeal. Even the third party reviewer has to be sold determined by the Commission. I have seen darkness, but I never see so dark like the rules written down in this proposed plan. Are there any rights left for the real investors who are the owner of these assets? I want to make one point very clear here, there is no way, we will give up our rights to protect our own interests and our own investment principals, we are not afraid of the evil CCP, does anyone think that we will fear someone else in this world? We can pay for the administration cost, but we will not back one inch to get our own principal back, no matter who seize it. Considering that the commission has done nothing to the CCP controlled corrupted companies, like Alibaba, which is really steeling the west people’s money with faked financial reports, but ironically the commission has taken down the one who are exposing them, therefore we can reasonably doubt that there are high risk that the Commission and the fair fund administrator might help CCP to collect all investors private information and secretly leak this information to them. Or by a smarter way, just claim the website be hacked by CCP, and all information was leaked, so that the Commission and the fair fund administrator should not take any responsibilities. We can not influence what the Commission and the fund administrator will do, but we can make our point clear here, all investors who are disappeared or suffered any financial or physical damages from the CCP during and after they give their key private information to the fair fund administrator, the Commission and the fair fund administrator must take 100% responsibility. The reason is straightforward, all investors who are still able to contact with the fair fund administrator means their private information is very good kept for almost two years, therefore if something new damages followed by the Proposed Plan carry out have to do with this action.

2) No one except the CCP, the fair fund administrator, the Escrow Property and the U.S. Treasury are already or might be in future to profit from the principals of 5000+ investors. The reasons are quite simple. First, GTV is still in its early development stage, as we all know that it’s very expensive to running such a platform, even the private placement is not interrupted by the Commission, this money will be used for the development of GTV, therefore by no means the commission could judge this is relevant to any sort of profiting for SARACA. And the investors are having problems to get their original principal returned after one and half years, clearly they are not able to profit from this too. Second, CCP benefit from this because the commission helped the evil regime to take down the GTV platforms against them. Third, the Proposed Plan wrote very clear that the Escrow Property can profit from this asset by investment and reinvestment, what outrages is that this profit will not be used to cover All Administrative Cost associated with the Escrow and Distribution Accounts. Fourth, the fair fund administrator can profit from this, because the 5000+ investors principals minus the transaction
cost will be used to cover the whole Administrative Cost. Surprisingly there is no limit to this cost, whether this cost is reasonable or not is solely determined by the Commission. Fifth, if there is still remaining of these investors principals, the U.S. Treasury will profit from this at last. The Proposed Plan stated that no one should profit for their own wrong doings, I am only asking here, who will make the wrong doing of the Commission accountable? Why do the commission's favorites profit from the commission's wrong doings? Is the administration power, the right to written favorable and unfair rules, and the closed systems without appropriate objective supervisions, are the ways for the commission to legally seizing assets and make their partners to profit from any foreign investors which they want to hunt down? No one can stop the criminals to commit crime, but we all have the rights to tell the world about what’s really happened, and try our best to seek for justice and accountability.

3) It's a very dangerous decision to take the bloody money from the investors who might be already disappeared or arrested by the evil CCP. A very suspicious thing is why the Commission think there will be some remaining with the fact that the total amount of money in the fair fund is even not even enough to cover the principals, and we have to pay the administration cost with it? As an investor I don’t think there is any reason to make a such prejudgement. Given the fact that CCP has already arrested and tortured some investors already, is that means the Commission has already known the real situation of this investment, or the Commission has never planed to return all these principals back to their owners, or in the worst case, the commission has planned to cooperate with CCP by collecting and leaking the investors’ private information, with the help from CCP (arresting the investor or their family members as a threat) the U.S. Treasury can legally seize these assets. No matter what really happened and what will happen, take the investors principals remaining and give it to U.S. Treasury is completely unacceptable and this will be a huge and terrible mistake. The five years history of the whistleblower movements has been live streamed and well recorded on line, no one can deny these facts. We have risked our life family and everything we have to warn the world about the real threat of CCP imposing on the whole world. The time and facts has proven most of what we have exposed about CCP’s evil deeds are correct. Our actions also show the world that who we are, what we are really caring about and what we are really fighting for. We don’t care about the death threat from CCP, so we will not worry much about our money, but we will fight like hell to protect our basic human rights, specially in a place with real rule of law and democracy. We tried our best to warn the west about the CCP’s infiltration to the west, but we can’t prevent the government agencies to break and devalue their own systems or their hardly earned public trust and authority internally. Taking the bloody money from the Chinese freedom fighters who might be jailed or killed by CCP, will be a stain for any U.S. officials or government agencies who are participated in. We have our self organized organizations (Himalaya farms and the New Federal State of China), we have donated and established our own rule of law and rule of society foundations, we know the death risks to invest in a platform that supports the freedom of speech for Chinese people, we treat all the investors as brothers and sisters, we will fight like hell to make sure their principals should be returned to their own or their closest ones if they are killed by the CCP. We can not stop what the commission plan to do, but the commission also has no rights to deprive our basic human rights, we are forced to pay the administration cost, but we will not accept the principals of our lost brothers and sisters to legally seized by the U.S. government and say nothing do nothing. If the commission really want to return this money, they can contact any organizations I have just mentioned above to do that under their supervision. I am sure these organizations will not spend even a coin from to return the remaining one day.