

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

ADMINISTRATIVE PROCEEDINGS RULINGS
Release No. 3212/October 9, 2015

ADMINISTRATIVE PROCEEDING
File No. 3-16678

In the Matter of

ARRIN CORPORATION,
GUNDAKER/JORDAN AMERICAN HOLDINGS
(A/K/A JORDAN AMERICAN HOLDINGS, INC.),
LIBERTY PETROLEUM CORPORATION,
MIKOJO INCORPORATED,
ROYAL INVEST INTERNATIONAL CORP., AND
SAN JOAQUIN BANCORP

ORDER

On July 8, 2015, the Securities and Exchange Commission issued an Order Instituting Proceedings pursuant to Section 12(j) of the Securities Exchange Act of 1934. On August 3, 2015, Respondent Gundaker/Jordan American Holdings filed its Answer, and on August 6, 2015, I ordered a briefing schedule for motions for summary disposition. *Arrin Corp.*, Admin. Proc. Rulings Release No. 3018, 2015 SEC LEXIS 3218. The Division of Enforcement filed its motion for summary disposition on August 19, 2015.

On or about September 18, 2015, this Office received an undated letter from Gundaker with no indication that it was served on the Office of the Secretary or the Division. This Office furnished a copy to the Office of the Secretary. The twelve-page letter, with an attached marketing brochure, primarily discusses Gundaker's history and Warren Buffett. Only the last two pages of the letter seem to address this proceeding and Gundaker's alleged failure to file periodic reports.

The letter's similarity to Gundaker's Answer led me to initially construe it as merely a duplicate copy of the Answer. Closer scrutiny suggests that it may have been intended as an opposition to the Division's motion for summary disposition, and I now construe it (liberally) as such. Although I previously ordered Gundaker to comply with the Rules of Practice, it did not properly file the letter or serve it on the Division, so the Division is not required to file a reply. If the Division wishes to file a reply, however, it shall file it no later than October 30, 2015.

SO ORDERED.

Cameron Elliot
Administrative Law Judge