

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

Administrative Proceedings Rulings  
Release No. 5590 / February 14, 2018

Administrative Proceeding  
File No. 3-18221

In the Matter of

**Guardian 8 Holdings,  
Idaho North Resources  
Corporation,  
Mecklermedia Corporation, and  
Verde Science, Inc.**

**Order Ratifying Prior Actions**

The Securities and Exchange Commission remanded this case to me following the issuance of an initial decision. *See Pending Admin. Proc.*, Securities Act of 1933 Release No. 10440, 2017 WL 5969234, at \*1-2 (Nov. 30, 2017). Consistent with the Commission's remand order, the parties were given the opportunity to submit new evidence that they deemed relevant to my reexamination of the record. *See Guardian 8 Holdings*, Admin Proc. Rulings Release No. 5321, 2017 SEC LEXIS 3963 (ALJ Dec. 7, 2017). The Division of Enforcement submitted a letter urging that I ratify my prior rulings, including the initial decision. No other submissions have been received from parties.

But an individual claiming to be a "major shareholder" of Mecklermedia Corporation emailed my office requesting a six-month stay to provide time for another entity to purchase Mecklermedia and bring it current. I construed the email as a motion on behalf of Mecklermedia and denied it because shareholders may not represent corporations in Commission administrative proceedings. *See Guardian 8 Holdings*, Admin. Proc. Rulings Release No. 5465, 2018 SEC LEXIS 114, at \*1 (ALJ Jan. 16, 2018). I will nevertheless consider the email as new evidence that may be relevant to my reconsideration of the record. *See* 17 C.F.R. § 201.320(a); *Pending Admin. Proc.* 2017 WL 5969234, at \*2.

The material facts have not changed since I issued the initial decision. *See Guardian 8 Holdings*, Initial Decision Release No. 1218, 2017 WL 4996775, at \*2 (ALJ Nov. 2, 2017). Mecklermedia has not filed a periodic report since it filed a Form 10-Q for the period ended September 30, 2015. *See Mecklermedia Corp., Quarterly Report (Form 10-Q)* (Nov. 6, 2015). There is no evidence that it has the financial wherewithal to file a single delinquent report. *See, e.g., id.* at 4 (reporting a net loss of \$2,672,000 for prior nine months).

The shareholder’s nonspecific representations do not alter my assessment of these facts. It is simply too late for Mecklermedia to bring itself current to avoid revocation. Even where a delinquent issuer becomes current in its periodic reports during an administrative proceeding, the public interest normally requires revocation of its securities registration as a deterrent to the respondent and other issuers. *Absolute Potential, Inc.*, Securities Exchange Act of 1934 Release No. 71866, 2014 WL 1338256, at \*3-8 (Apr. 4, 2014); *see Citizens Capital Corp.*, Exchange Act Release No. 67313, 2012 WL 2499350, at \*2-7 (June 29, 2012) (revoking registration despite issuer’s efforts to become current); *Calais Res. Inc.*, Exchange Act Release No. 67312, 2012 WL 2499349, at \*2-7 (June 29, 2012) (same). Only a “strongly compelling showing” regarding the other public interest factors—which has not been made here—would justify a lesser sanction than revocation for a respondent’s recurrent failures to file periodic reports. *Absolute Potential*, 2014 WL 1338256, at \*6.

Upon reconsideration of the record, I therefore find nothing that requires revision. I RATIFY all prior actions taken by an administrative law judge in this proceeding.<sup>1</sup> The process contemplated by the Commission’s November 30 order is complete.

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Jason S. Patil  
Administrative Law Judge

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<sup>1</sup> My designation as the presiding administrative law judge in this proceeding has already been ratified. *Pending Admin. Proc.*, Admin. Proc. Rulings Release No. 5247, 2017 SEC LEXIS 3780 (ALJ Dec. 4, 2017).