## UNITED STATES OF AMERICA Before the SECURITIES AND EXCHANGE COMMISSION

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ADMINISTRATIVE PROCEEDING File No. 3-15993

In the Matter of

Accredited Business Consolidators Corp., et al.,

Respondents.

## DIVISION OF ENFORCEMENT'S MOTION TO THE COMMISSION TO DISMISS RESPONDENT AND BRIEF IN SUPPORT

The Division of Enforcement ("Division"), by counsel, hereby moves the Commission to dismiss Respondent High Plains Gas, Inc. ("High Plains") from this administrative proceeding, which was brought pursuant to Section 12(j) of the Securities Exchange Act of 1934 ("Exchange Act") to suspend or revoke High Plains' securities registration.

As explained below in its Brief in Support of this Motion, the Division seeks this relief because High Plains filed a Form 15 to voluntarily deregister its securities on August 5, 2014, which became effective today, November 3, 2014.

## **BRIEF IN SUPPORT**

The Commission initiated this administrative proceeding on July 31, 2014, against High Plains and five other Respondents. Only Accredited Business Consolidators Corp. and High Plains remains in the case. The Division has a pending motion for summary disposition against Accredited Business Consolidators Corp. On August 5, 2014, High Plains filed a valid Form 15

to voluntarily deregister its securities, and this Form 15 becomes effective today, November 3, 2014, 90 days after it was filed.

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The Division respectfully submits that the portion of this administrative proceeding that relates to High Plains should be dismissed because High Plains' securities are no longer registered under Exchange Act Section 12. Because High Plains has no securities registered under Exchange Act Section 12, there are no securities to be suspended or revoked pursuant to Section 12(j) of the Exchange Act -- the very purpose of this administrative proceeding. Accordingly, the administrative proceeding should be dismissed as to High Plains as effectively moot. See JMAR Technologies, Inc., Securities Exchange Act of 1934 Rel. No. 67503 (July 25, 2012) (Commission dismissed Exchange Act Section 12(j) proceeding where respondent filed Form 15 after OIP was instituted and therefore no longer had a class of securities registered under Section 12); BCI Telecom Holding, Inc., Securities Exchange Act of 1934 Rel. No. 62649 (Aug. 4, 2010) (Commission dismissed Section 12(j) proceeding where an unregistered issuer had been mistakenly confused with its registered corporate affiliate); FuelNation, Inc., Securities Exchange Act of 1934 Rel. No. 55863 (June 5, 2007) (Commission dismissed Section 12(j) proceeding where issuer's Section 12(b) registration was stricken by the Division of Market Regulation, and the issuer did not become registered under Section 12(g) pursuant to Exchange Act Rule 12g-2).

## Conclusion

For the reasons set forth above, the Division respectfully requests that the Commission order the dismissal of Respondent High Plains from this proceeding.