

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-16318

In the Matter of

**ALEXANDRE S. CLUG,
AURUM MINING, LLC,
PANAM TERRA, INC., and
THE CORSAIR GROUP, INC.,**

Respondents.

**BRIEF OF THE DIVISION OF
ENFORCEMENT IN OPPOSITION TO
RESPONDENT ALEXANDRE S.
CLUG’S MOTION FOR
RECONSIDERATION**

The Division of Enforcement respectfully submits this brief in opposition to the motion for reconsideration (“Mot.”) filed by Respondent Alexandre S. Clug (“Clug”) asking the Commission to reconsider the monetary sanctions imposed in its Opinion dated November 9, 2020 (“Op.”).

PRELIMINARY STATEMENT

Clug’s proven conduct in no way supports *any* reduction to the reasonable and appropriate monetary sanctions imposed by the Commission. In fact, the stunningly broad scope of Clug’s numerous securities laws violations from 2010 through 2014 deserves strong sanctions. Clug helped organize the Aurum Mining offering fraud, which fleeced investors of \$4 million, and he made repeated written and oral misrepresentations to investors. Op. at 5-15. Clug also aided and abetted fraudulent disclosures and reporting violations by PanAm Terra, a public company. Op. at 15-27. Finally, Clug caused The Corsair Group to unlawfully act as an unregistered broker dealer. Op. at 27-30. With regard to Clug’s inability-to-pay claims, the

Commission found that Clug was “not credible” because he “repeatedly failed to disclose significant financial information relevant to such a defense.” Op. at 40-42.

Instead of expressing remorse for his conduct or sympathy for the victims of his fraudulent conduct, Clug now falsely describes himself as a hero who tried to “do the right thing for investors.” Mot. at 5-6. Clug’s motion, moreover, ignores the Commission’s finding of his earlier “repeated failures to disclose significant financial information,” Op. at 41, and makes even more incomplete representations about his financial condition.

In view of Clug’s multiple and intentional violations of the securities laws, the public interest requires no reduction in the monetary sanctions. The motion for reconsideration should be denied.

ARGUMENT

Rule 470(b) of the Rules of Practice provides that a “motion for reconsideration shall briefly and specifically state the matters of record alleged to have been erroneously decided, the grounds relied upon and the relief sought.” 17 C.F.R. § 201.470(b). Rule 470 permits the Commission to reconsider its decisions only “in exceptional cases.” *Reuben D. Peters*, Exchange Act Rel. No. 51237, 2005 WL 424918 at *1 (Feb. 22, 2005).

“A motion for reconsideration is designed to correct manifest errors of law or fact or to permit the presentation of newly discovered evidence, but may not be used to repeat arguments previously made.” *Mitchell M. Maynard*, Investment Advisers Act Rel. No. 2901, 2009 WL 2082893, at *1 (July 16, 2009) (denying motion for reconsideration). *See also Philip A Lehman*, Exchange Act Rel. No. 54991, AP File No. 3-11972, 2006 WL 3751143, at *1 (Dec. 21, 2006) (denying motion for reconsideration because the “new evidence [came] . . . too late. There are

fairness as well as efficiency concerns that would be implicated were we to accept the material at this point”).

I. Clug’s Failure to Submit an Updated Sworn Financial Statement Requires Denial of the Motion

As Clug knows, Rule 630 requires him to base his inability-to-pay claim on a sworn financial disclosure done under penalty of perjury on Form D-A and “keep the statement current.” Op. at 40. Although the Commission determined that Clug’s August 2015 financial disclosure statement was incomplete and misleading, *id.*, Clug failed to submit a current sworn financial disclosure statement. Instead, Clug bases his motion on unsworn statements in his brief.

Clug had a duty under Rule 630 to update his financial condition, which he failed to do even after the completion of briefing in February 2019 and oral argument in September 2019. For this reason alone, Clug’s motion should be denied. *See, e.g., Eric J. Brown, et al.*, Exchange Act Rel. No. 66752, 2012 WL 1143573, at *4 (Apr. 5, 2012) (denying motion for reconsideration; respondent “had ample opportunity to present evidence of an inability to pay”); *Edgar R. Page*, Advisers Act Rel. No. 4454, 2016 WL 3753502 at *1 (July 14, 2016) (denying motion for reconsideration; respondent failed to submit updated financial disclosure forms).

II. Clug’s Employment

Clug’s vague and incomplete descriptions of his current employment do not support any reduction in sanctions. On the contrary, it appears that Clug does have the ability to make payments toward the amounts he owes.

Clug first states that an unidentified “acquaintance” has been paying him \$5,000 per month for unidentified “consulting” services. Mot. at 3. While Clug states that this unidentified person “was not able to pay me for several months” and that Clug does not know “how long this

work will last,” Clug is nevertheless “hopeful” that “regular payments” will resume. Mot. at 3. Although it is impossible to know the veracity of this unsworn statement, at a minimum it shows that Clug has a source of income from which payments can be made.

Clug also admits that he now has a real estate license and “hope[s] to make some inroads there.” Mot. at 3. Clug failed to disclose, however, that he is an employee of a real estate firm named Paradise Real Estate International. Appendix dated January 15, 2021 (“App.”) at 1; (Florida real estate board license); at 2-5 (Clug’s page from Paradise Real Estate International web site).

Clug also has not disclosed his apparent ongoing business relationships with two companies connected to Barry Cohen, the chief executive officer of Avra Medical Robotics, Inc. (“Avra”), where Clug had previously worked. Clug’s connections to these companies—Infinite Mind LLC and XYZMinds LLC—is shown in public records. App. at 4-9 (2019 and 2020 corporate records showing Clug as registered agent for Infinite Mind LLC); at 10-12 (2018 and 2020 corporate records showing Clug as registered agent and manager of XYZMinds LLC).

Based on this record, Clug does have a future earning potential that, taking into account the public interest factors, is more than sufficient to justify denying his motion for an ability-to-pay reduction. *See e.g. Russell C. Schalk, Jr.*, Exchange Act Rel. No. 78898, 2016 WL 5219501 at *4 (Sept. 21, 2016) (rejecting ability-to-pay argument in part based on likelihood of future earnings and ability to reduce expenses).

III. Clug's Claims Regarding the Avra Shares Are Incorrect

Clug's assertions that the Avra shares are untradeable and essentially worthless are without merit.

First, Clug does not dispute that he and his wife have beneficial ownership of more than 1 million Avra shares. Clug also does not and cannot dispute the Commission's finding that in early 2019 Avra was "trading on the over-the-counter market" at \$3 per share. Op. at 41.

Second, Clug claims that there is a "lack of a market" for Avra shares and that "[m]ost days the volume is zero." Mot. at 5. This claim is contradicted by publicly available trading data from NASDAQ showing trading activity nearly every business day during the past 12 months. App. at 13-18. The share price, moreover, has nearly doubled in recent weeks from its low point in July 2020 and now trades at over 0.50 per share. *Id.* At this price, the million shares held by Clug and his wife are worth approximately \$500,000, which—as the Commission found—is sufficient to cover Clug's monetary judgment. Op. at 41.

Third, Clug claims that the "true value" of the shares is "de minimus" because of his "inability to deposit them anywhere." Mot. at 4-5. To support this assertion, Clug points to 2018 letters from E*Trade and Ameritrade closing brokerage accounts in his name or his wife's name. *Id.* Clug, however, does not offer evidence that since 2018 he or his wife has tried and failed to open a brokerage account for the purpose of selling his Avra shares. That two firms ceased doing business with Clug in 2018 does not support Clug's position that no broker-dealer would open an account for the limited purpose of allowing for the Avra shares to be sold.

Fourth, Clug incorrectly claims that "Avra has not been reporting for a year now." *Id.* at 5. In fact, Avra remains a reporting company and its most recent filing was May 2020. App. at 19-21.

Finally, Clug’s brief devotes a single sentence to the Stock Sale and Purchase Agreement dated June 30, 2020 (“Purchase Agreement”). The Purchase Agreement purports to transfer at some future date—if and when the buyer actually pays any money to Clug’s wife—the one million Avra shares for the bargain price of \$10,000. Mot. Ex. D. Notably, Clug failed to disclose this transaction when it happened; as a result, it should be given no significance. *See Philip A. Lehman*, 2006 WL 3751143, at *2 n.5 (on a motion for reconsideration, Commission will only accept evidence that the respondent did not know about *before* entry of the order subject to the reconsideration motion).

In any event, Clug justifies this curious transaction by pointing to his “financial difficulties” and the “apparent dire prospects” for his Avra shares. Mot. at 6. It is impossible to assess whether the Purchase Agreement represents a legitimate arms-length transaction or—which seems more likely—is simply a means for Clug to justify his argument that the Avra shares are without value. The Purchase Agreement does not require Clug’s wife to transfer the shares to the buyer until the \$10,000 had been paid in full, which apparently has not yet happened. As a result, Clug’s wife remains the owner of the shares and it is unclear whether any money has been paid. The buyer could forfeit any partial payments she may have made to Clug’s wife if she fails to complete the payment by June 30, 2021. In addition, the Division has had no opportunity to question the buyer, Ann Marie Skordy, under oath about this transaction. As a result, the Purchase Agreement should be given no weight.

IV. Clug's Property Acquisitions

Clug states that he and his wife now live with his father and are renting out their Palm Beach Gardens property. This both reduces Clug's expenses and increases his income (although Clug does not disclose the amount of the rental income; nor does he disclose his wife's current income).

Clug also claims that he applied for or received a Veterans Administration mortgage loan. Section K of Form D-A, however, specifically requires disclosure of "any financial statement that you prepared for any purpose (e.g., a financial statement provided to a bank to secure a loan...)." Clug, however, has not disclosed any documents relating to his VA loan application.

Finally, Palm Beach County property records show that on December 31, 2020, Clug and his wife have acquired yet another property for \$231,000. App. at 23-24. It also appears that Clug has rented his condo at [REDACTED] for \$2,400 per month,¹ which makes three rental properties that are generating income for Clug and his wife.²

¹ See <https://www.miamicondoinvestments.com/property/900-biscayne-blvd-3307-miami-fl-33132-a10357155>

² Clug's 1/29/18 Statement of Financial Condition discloses that a property owned by Clug and his wife at 965 Laurel is being rented for \$1,890 per month.

CONCLUSION

The Division of Enforcement respectfully requests that the Commission deny Clug's motion for reconsideration.

Dated: New York, NY
 January 15, 2021

Respectfully submitted,

DIVISION OF ENFORCEMENT

/s David Stoelting

David Stoelting

Ibrahim Bah

Securities and Exchange Commission

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UNITED STATES OF AMERICA
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SECURITIES AND EXCHANGE COMMISSION

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APPENDIX

The following documents, which were obtained from publicly available sources, are referenced in the Division of Enforcement's Brief in Opposition to the Motion for Reconsideration dated January 15, 2021:

Document	Page
Excerpt from Florida real estate licensing board web site	1
Excerpt from web site of Paradise Real Estate International LLC	2
Records of Infinite Mind LLC	4
Records of XYZMinds LLC	10
Trading data of Avra Medical Robotics, Inc. between January 2020 and January 2021	13
Avra Medical Robotics, Inc.'s Notice of Late Filing Dated May 14, 2020	19
Warranty Deed dated December 31, 2020	23

Dated: January 15, 2021



Licensee

Name:	CLUG, ALEXANDRE STEPHEN	License Number:	3465459
Rank:	Real Estate Sales Associate	License Expiration Date:	09/30/2021
Primary Status:	Current	Original License Date:	02/21/2020
Secondary Status:	Active		

Related License Information

License Number	Status	Related Party	Relationship Type	Relation Effective Date	Rank	Expiration Date
1044548	Current, Active	PARADISE REAL ESTATE INTERNATIONAL LLC	Employed By	02/24/2020	Real Estate Corporation	03/31/2023

OUR AGENTS



Alex Clug

Realtor Associate

Palm Beach County

☎ 305-610-8000

✉ alex@paradiserealestateintl.com (mailto:alex@paradiserealestateintl.com)

Alex has called South Florida his home base for over two decades and his love of the area has inspired him to continue working and living locally.

Inspired by a long-time interest in real estate that began while obtaining a Masters in Business Administration from the Anderson School at UCLA, Alex has personally invested in the local real estate market for over a decade. He shares his experience and helps clients navigate the complex real estate market and reach their goals when buying or selling their property. He works tirelessly to help his clients find that special property in their neighborhood of choice that best suits all of their needs. His attention to detail makes him a genuine asset to his clients and makes purchasing or selling a home a rewarding and positive experience....whether you're a first-time or experienced buyer or seller.

A US Army veteran and West Point graduate, Alex represents his clients with the utmost integrity and ethical standards. He utilizes the latest technology to provide the greatest exposure possible when marketing clients' property or helping them purchase their dream home.

Alex is fluent in English, Spanish & French and, after over a dozen relocations in as many years, he understands the stresses of the relocation process and can help his clients smoothly navigate the process.

Alex lives in [REDACTED] with his wife and enjoys tennis, swimming and boating. If you are looking for a proactive Realtor who is as passionate about the search as you are, call Alex.

Credentials

- Fluent in Spanish & French

Specialties

- Luxury Homes & Condos
- New Construction
- Golf and Country Club Homes
- Waterfront Homes

[View Featured Listings \(/mylistings/273/\)](/mylistings/273/)

CONTACT ALEX CLUG
CONTACT US



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Palm Beach Gardens 561-203-6200 Naples 239-261-5577
Sebring 863-272-9065
Fax Number 561-203-8066
Email (</contact/>)

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([https://accounts.google.com/ServiceLogin?
service=oz&hl=en&continue=https%3A%2F%2Fplus.google.com%2F11311582](https://accounts.google.com/ServiceLogin?service=oz&hl=en&continue=https%3A%2F%2Fplus.google.com%2F11311582))

(<https://www.facebook.com/paradiserei>)
(<https://www.pinterest.com/paradiserea0102>)

2020 FLORIDA LIMITED LIABILITY COMPANY ANNUAL REPORT

DOCUMENT# L19000105008

Entity Name: INFINITE MIND, LLC

Current Principal Place of Business:

3259 PROGRESS DRIVE
SUITE 114
ORLANDO, FL 32826

Current Mailing Address:

150 WATERS EDGE DRIVE
JUPITER, FL 33477 US

FEI Number: 83-4534183

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

CLUG, ALEXANDRE S
150 WATERS EDGE DRIVE
JUPITER, FL 33477 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

Authorized Person(s) Detail :

Title MGR
Name COHEN, BARRY F
Address 1600 SE 15TH STREET, #512
City-State-Zip: FT LAUDERDALE FL 33316

Title MGR
Name MOLL, FRED
Address 4000 EAST DENNY BLAINE PLACE
City-State-Zip: SEATTLE WA 98112

Title MGR
Name POLLAK, RUTHI
Address 586 WEST PALM VALLEY DRIVE
City-State-Zip: OVIEDO FL 32765

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: BARRY COHEN

MANAGER

01/14/2020

Electronic Signature of Signing Authorized Person(s) Detail

Date



[Department of State](#) / [Division of Corporations](#) / [Search Records](#) / [Search by Officer/Registered Agent Name](#) /

Detail by Officer/Registered Agent Name

Florida Limited Liability Company

INFINITE MIND, LLC

Filing Information

Document Number	L19000105008
FEI/EIN Number	83-4534183
Date Filed	04/17/2019
Effective Date	04/15/2019
State	FL
Status	ACTIVE
Last Event	LC AMENDMENT
Event Date Filed	08/24/2020
Event Effective Date	NONE

Principal Address

3259 PROGRESS DRIVE
SUITE 114

APP-7

ORLANDO, FL 32826

Changed: 01/14/2020

Mailing Address

150 WATERS EDGE DRIVE
JUPITER, FL 33477

Registered Agent Name & Address

CLUG, ALEXANDRE S
150 WATERS EDGE DRIVE
JUPITER, FL 33477

Authorized Person(s) Detail

Name & Address

Title MGR

COHEN, BARRY F
1600 SE 15TH STREET, #512
FT LAUDERDALE, FL 33316

Title MGR

MOLL, FRED
4000 EAST DENNY BLAINE PLACE
SEATTLE, WA 98112

Annual Reports

Report Year	Filed Date
2020	01/14/2020

Document Images

[08/24/2020 -- LC Amendment](#)

[View image in PDF format](#)

[01/14/2020 -- ANNUAL REPORT](#)

[View image in PDF format](#)

[04/17/2019 -- Florida Limited Liability](#)

[View image in PDF format](#)

Florida Department of State, Division of Corporations

2020 FLORIDA LIMITED LIABILITY COMPANY ANNUAL REPORT

DOCUMENT# L18000221205

Entity Name: XYZMINDS LLC

Current Principal Place of Business:

3259 PROGRESS DRIVE
SUITE 112A
ORLANDO, FL 32826

Current Mailing Address:

150 WATERS EDGE DRIVE
JUPITER, FL 33477 US

FEI Number: 83-1958267

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

CLUG, ALEXANDRE S
150 WATERS EDGE DRIVE
JUPITER, FL 33477 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: _____

Electronic Signature of Registered Agent

Date

Authorized Person(s) Detail :

Title	MGR	Title	MGR
Name	COHEN, BARRY F	Name	CLUG, ALEXANDRE S
Address	1600 SE 15TH STREET, #512	Address	150 WATERS EDGE DRIVE
City-State-Zip:	FT LAUDERDALE FL 33316	City-State-Zip:	JUPITER FL 33477

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: ALEXANDRE CLUG

MGR

04/01/2020

Electronic Signature of Signing Authorized Person(s) Detail

Date

Trading in AVRA Stock From Jan 2020 to Jan 2021Source: www.nasdaq.com/symbol/avmr/historical

Date	Close/Last	Volume	Open	High	Low
1/14/2021	\$0.53	1962	\$0.54	\$0.54	\$0.50
1/13/2021	\$0.53	5516	\$0.54	\$0.54	\$0.53
1/12/2021	\$0.53	1200	\$0.54	\$0.54	\$0.53
1/11/2021	\$0.54	5272	\$0.54	\$0.54	\$0.38
1/8/2021	\$0.54	5053	\$0.54	\$0.54	\$0.48
1/7/2021	\$0.50	2026	\$0.54	\$0.50	\$0.50
1/6/2021	\$0.50	929	\$0.54	\$0.50	\$0.50
1/5/2021	\$0.48	100	\$0.54	\$0.48	\$0.48
1/4/2021	\$0.46	2079	\$0.54	\$0.46	\$0.42
12/31/2020	\$0.45	706	\$0.54	\$0.45	\$0.45
12/30/2020	\$0.45	2286	\$0.54	\$0.45	\$0.42
12/29/2020	\$0.35	2735	\$0.54	\$0.46	\$0.35
12/28/2020	\$0.45	1068	\$0.54	\$0.45	\$0.45
12/24/2020	\$0.44	400	\$0.54	\$0.44	\$0.44
12/23/2020	\$0.45	3721	\$0.54	\$0.45	\$0.29
12/22/2020	\$0.42	8845	\$0.54	\$0.45	\$0.36
12/21/2020	\$0.40	1000	\$0.54	\$0.50	\$0.31
12/18/2020	\$0.29	7200	\$0.54	\$0.34	\$0.29
12/17/2020	\$0.35	1700	\$0.54	\$0.44	\$0.35
12/16/2020	\$0.44	3130	\$0.54	\$0.50	\$0.28
12/15/2020	\$0.27	N/A	\$0.54	\$0.27	\$0.27
12/14/2020	\$0.27	2800	\$0.54	\$0.27	\$0.26
12/11/2020	\$0.26	3457	\$0.54	\$0.54	\$0.26
12/10/2020	\$0.49	200	\$0.54	\$0.49	\$0.49
12/9/2020	\$0.37	N/A	\$0.54	\$0.37	\$0.37
12/8/2020	\$0.37	160	\$0.54	\$0.37	\$0.37
12/7/2020	\$0.31	3600	\$0.54	\$0.31	\$0.31
12/4/2020	\$0.43	497	\$0.54	\$0.43	\$0.43
12/3/2020	\$0.31	2700	\$0.54	\$0.49	\$0.31
12/2/2020	\$0.47	130	\$0.54	\$0.47	\$0.47
12/1/2020	\$0.46	255	\$0.54	\$0.51	\$0.46
11/30/2020	\$0.45	11491	\$0.54	\$0.45	\$0.25
11/27/2020	\$0.30	1950	\$0.54	\$0.40	\$0.30
11/25/2020	\$0.34	N/A	\$0.54	\$0.34	\$0.34
11/24/2020	\$0.34	1340	\$0.54	\$0.45	\$0.24
11/23/2020	\$0.22	213	\$0.54	\$0.22	\$0.22
11/20/2020	\$0.22	9887	\$0.54	\$0.40	\$0.20
11/19/2020	\$0.35	1200	\$0.54	\$0.36	\$0.35
11/18/2020	\$0.36	N/A	\$0.54	\$0.36	\$0.36
11/17/2020	\$0.36	425	\$0.54	\$0.36	\$0.22
11/16/2020	\$0.36	270	\$0.54	\$0.36	\$0.36
11/13/2020	\$0.31	300	\$0.54	\$0.31	\$0.22
11/12/2020	\$0.36	N/A	\$0.54	\$0.36	\$0.36
11/11/2020	\$0.36	1588	\$0.54	\$0.36	\$0.21
11/10/2020	\$0.36	1880	\$0.54	\$0.36	\$0.36
11/9/2020	\$0.36	882	\$0.54	\$0.36	\$0.36

11/6/2020	\$0.36	N/A	\$0.54	\$0.36	\$0.36
11/5/2020	\$0.36	2825	\$0.54	\$0.36	\$0.22
11/4/2020	\$0.36	1000	\$0.54	\$0.36	\$0.36
11/3/2020	\$0.36	200	\$0.54	\$0.36	\$0.27
11/2/2020	\$0.36	831	\$0.54	\$0.38	\$0.30
10/30/2020	\$0.36	3954	\$0.54	\$0.36	\$0.22
10/29/2020	\$0.40	N/A	\$0.54	\$0.40	\$0.40
10/28/2020	\$0.40	N/A	\$0.54	\$0.40	\$0.40
10/27/2020	\$0.40	N/A	\$0.54	\$0.40	\$0.40
10/26/2020	\$0.40	142	\$0.54	\$0.40	\$0.40
10/23/2020	\$0.40	1111	\$0.54	\$0.40	\$0.40
10/22/2020	\$0.40	N/A	\$0.54	\$0.40	\$0.40
10/21/2020	\$0.40	1000	\$0.54	\$0.40	\$0.40
10/20/2020	\$0.31	850	\$0.54	\$0.40	\$0.21
10/19/2020	\$0.34	4857	\$0.54	\$0.40	\$0.20
10/16/2020	\$0.35	13315	\$0.54	\$0.40	\$0.21
10/15/2020	\$0.40	400	\$0.54	\$0.40	\$0.21
10/14/2020	\$0.30	8326	\$0.54	\$0.45	\$0.20
10/13/2020	\$0.50	N/A	\$0.54	\$0.50	\$0.50
10/12/2020	\$0.50	N/A	\$0.54	\$0.50	\$0.50
10/9/2020	\$0.50	525	\$0.54	\$0.54	\$0.50
10/8/2020	\$0.54	725	\$0.54	\$0.54	\$0.40
10/7/2020	\$0.53	100	\$0.54	\$0.53	\$0.53
10/6/2020	\$0.55	N/A	\$0.54	\$0.55	\$0.55
10/5/2020	\$0.55	2370	\$0.54	\$0.55	\$0.50
10/2/2020	\$0.55	N/A	\$0.54	\$0.55	\$0.55
10/1/2020	\$0.55	N/A	\$0.54	\$0.55	\$0.55
9/30/2020	\$0.55	425	\$0.54	\$0.55	\$0.45
9/29/2020	\$0.50	N/A	\$0.54	\$0.50	\$0.50
9/28/2020	\$0.50	N/A	\$0.54	\$0.50	\$0.50
9/25/2020	\$0.50	4200	\$0.54	\$0.50	\$0.25
9/24/2020	\$0.57	N/A	\$0.54	\$0.57	\$0.57
9/23/2020	\$0.57	N/A	\$0.54	\$0.57	\$0.57
9/22/2020	\$0.57	N/A	\$0.54	\$0.57	\$0.57
9/21/2020	\$0.57	100	\$0.54	\$0.57	\$0.57
9/18/2020	\$0.58	300	\$0.54	\$0.58	\$0.58
9/17/2020	\$0.53	N/A	\$0.54	\$0.53	\$0.53
9/16/2020	\$0.53	4180	\$0.54	\$0.58	\$0.18
9/15/2020	\$0.58	N/A	\$0.54	\$0.58	\$0.58
9/14/2020	\$0.58	2410	\$0.54	\$0.58	\$0.58
9/11/2020	\$0.58	N/A	\$0.54	\$0.58	\$0.58
9/10/2020	\$0.58	N/A	\$0.54	\$0.58	\$0.58
9/9/2020	\$0.58	1578	\$0.54	\$0.58	\$0.58
9/8/2020	\$0.49	348	\$0.54	\$0.53	\$0.42
9/4/2020	\$0.46	1400	\$0.54	\$0.60	\$0.37
9/3/2020	\$0.59	210	\$0.54	\$0.59	\$0.19
9/2/2020	\$0.59	3038	\$0.54	\$0.60	\$0.59

9/1/2020	\$0.24	3100	\$0.54	\$0.29	\$0.24
8/31/2020	\$0.29	4985	\$0.54	\$0.29	\$0.24
8/28/2020	\$0.27	5400	\$0.54	\$0.27	\$0.23
8/27/2020	\$0.23	4610	\$0.54	\$0.24	\$0.21
8/26/2020	\$0.23	8760	\$0.54	\$0.23	\$0.20
8/25/2020	\$0.22	3000	\$0.54	\$0.22	\$0.22
8/24/2020	\$0.24	10260	\$0.54	\$0.24	\$0.21
8/21/2020	\$0.20	4705	\$0.54	\$0.21	\$0.18
8/20/2020	\$0.23	3700	\$0.54	\$0.23	\$0.18
8/19/2020	\$0.23	3645	\$0.54	\$0.24	\$0.18
8/18/2020	\$0.24	N/A	\$0.54	\$0.24	\$0.24
8/17/2020	\$0.24	3280	\$0.54	\$0.26	\$0.18
8/14/2020	\$0.24	N/A	\$0.54	\$0.24	\$0.24
8/13/2020	\$0.24	4955	\$0.54	\$0.24	\$0.18
8/12/2020	\$0.21	5025	\$0.54	\$0.21	\$0.18
8/11/2020	\$0.24	1750	\$0.54	\$0.24	\$0.23
8/10/2020	\$0.20	23193	\$0.54	\$0.29	\$0.18
8/7/2020	\$0.24	11850	\$0.54	\$0.24	\$0.18
8/6/2020	\$0.24	951	\$0.54	\$0.24	\$0.21
8/5/2020	\$0.20	1099	\$0.54	\$0.20	\$0.18
8/4/2020	\$0.25	400	\$0.54	\$0.25	\$0.24
8/3/2020	\$0.25	1724	\$0.54	\$0.25	\$0.18
7/31/2020	\$0.25	16200	\$0.54	\$0.25	\$0.19
7/30/2020	\$0.25	N/A	\$0.54	\$0.25	\$0.25
7/29/2020	\$0.25	726	\$0.54	\$0.25	\$0.25
7/28/2020	\$0.25	9055	\$0.54	\$0.25	\$0.20
7/27/2020	\$0.24	200	\$0.54	\$0.24	\$0.24
7/24/2020	\$0.24	600	\$0.54	\$0.24	\$0.18
7/23/2020	\$0.24	445	\$0.54	\$0.24	\$0.24
7/22/2020	\$0.24	367	\$0.54	\$0.24	\$0.24
7/21/2020	\$0.25	3644	\$0.54	\$0.29	\$0.23
7/20/2020	\$0.23	550	\$0.54	\$0.23	\$0.20
7/17/2020	\$0.20	12392	\$0.54	\$0.23	\$0.20
7/16/2020	\$0.18	16890	\$0.54	\$0.23	\$0.17
7/15/2020	\$0.20	1510	\$0.54	\$0.23	\$0.17
7/14/2020	\$0.20	13301	\$0.54	\$0.23	\$0.17
7/13/2020	\$0.16	18005	\$0.54	\$0.25	\$0.15
7/10/2020	\$0.28	1100	\$0.54	\$0.28	\$0.28
7/9/2020	\$0.28	13474	\$0.54	\$0.28	\$0.15
7/8/2020	\$0.20	13670	\$0.54	\$0.20	\$0.16
7/7/2020	\$0.28	483	\$0.54	\$0.28	\$0.16
7/6/2020	\$0.28	1025	\$0.54	\$0.28	\$0.16
7/2/2020	\$0.29	26766	\$0.54	\$0.33	\$0.13
7/1/2020	\$0.30	2600	\$0.54	\$0.30	\$0.20
6/30/2020	\$0.33	125	\$0.54	\$0.33	\$0.33
6/29/2020	\$0.30	500	\$0.54	\$0.30	\$0.30
6/26/2020	\$0.30	5195	\$0.54	\$0.30	\$0.17

6/25/2020	\$0.33	130	\$0.54	\$0.33	\$0.33
6/24/2020	\$0.30	5638	\$0.54	\$0.33	\$0.30
6/23/2020	\$0.30	2826	\$0.54	\$0.30	\$0.14
6/22/2020	\$0.30	13994	\$0.54	\$0.33	\$0.30
6/19/2020	\$0.30	N/A	\$0.54	\$0.30	\$0.30
6/18/2020	\$0.30	676	\$0.54	\$0.30	\$0.29
6/17/2020	\$0.30	801	\$0.54	\$0.30	\$0.25
6/16/2020	\$0.22	34185	\$0.54	\$0.23	\$0.13
6/15/2020	\$0.30	8263	\$0.54	\$0.40	\$0.22
6/12/2020	\$0.33	N/A	\$0.54	\$0.33	\$0.33
6/11/2020	\$0.33	N/A	\$0.54	\$0.33	\$0.33
6/10/2020	\$0.33	58356	\$0.54	\$0.60	\$0.15
6/9/2020	\$0.28	1354	\$0.54	\$0.30	\$0.28
6/8/2020	\$0.28	2929	\$0.54	\$0.28	\$0.25
6/5/2020	\$0.28	1395	\$0.54	\$0.28	\$0.28
6/4/2020	\$0.28	1225	\$0.54	\$0.30	\$0.28
6/3/2020	\$0.28	4315	\$0.54	\$0.29	\$0.28
6/2/2020	\$0.28	8660	\$0.54	\$0.30	\$0.15
6/1/2020	\$0.28	15948	\$0.54	\$0.30	\$0.23
5/29/2020	\$0.25	2271	\$0.54	\$0.30	\$0.25
5/28/2020	\$0.25	935	\$0.54	\$0.30	\$0.25
5/27/2020	\$0.25	2700	\$0.54	\$0.27	\$0.15
5/26/2020	\$0.23	2364	\$0.54	\$0.23	\$0.23
5/22/2020	\$0.23	5450	\$0.54	\$0.25	\$0.23
5/21/2020	\$0.25	376	\$0.54	\$0.25	\$0.25
5/20/2020	\$0.25	2274	\$0.54	\$0.30	\$0.20
5/19/2020	\$0.25	5203	\$0.54	\$0.30	\$0.20
5/18/2020	\$0.25	2760	\$0.54	\$0.30	\$0.25
5/15/2020	\$0.25	100	\$0.54	\$0.25	\$0.25
5/14/2020	\$0.25	16633	\$0.54	\$0.25	\$0.25
5/13/2020	\$0.25	4341	\$0.54	\$0.25	\$0.20
5/12/2020	\$0.25	1240	\$0.54	\$0.25	\$0.25
5/11/2020	\$0.25	1526	\$0.54	\$0.25	\$0.12
5/8/2020	\$0.24	100	\$0.54	\$0.24	\$0.24
5/7/2020	\$0.24	11539	\$0.54	\$0.25	\$0.11
5/6/2020	\$0.25	7800	\$0.54	\$0.25	\$0.25
5/5/2020	\$0.25	4135	\$0.54	\$0.25	\$0.21
5/4/2020	\$0.25	215	\$0.54	\$0.25	\$0.25
5/1/2020	\$0.25	1125	\$0.54	\$0.25	\$0.25
4/30/2020	\$0.25	484	\$0.54	\$0.25	\$0.25
4/29/2020	\$0.25	5826	\$0.54	\$0.25	\$0.14
4/28/2020	\$0.25	3109	\$0.54	\$0.35	\$0.25
4/27/2020	\$0.25	400	\$0.54	\$0.25	\$0.25
4/24/2020	\$0.25	200	\$0.54	\$0.25	\$0.14
4/23/2020	\$0.25	550	\$0.54	\$0.25	\$0.25
4/22/2020	\$0.25	5856	\$0.54	\$0.25	\$0.20
4/21/2020	\$0.25	5225	\$0.54	\$0.25	\$0.14

4/20/2020	\$0.29	N/A	\$0.54	\$0.29	\$0.29
4/17/2020	\$0.29	9569	\$0.54	\$0.29	\$0.25
4/16/2020	\$0.29	437	\$0.54	\$0.29	\$0.14
4/15/2020	\$0.29	1100	\$0.54	\$0.30	\$0.29
4/14/2020	\$0.29	610	\$0.54	\$0.30	\$0.29
4/13/2020	\$0.29	6879	\$0.54	\$0.30	\$0.14
4/9/2020	\$0.30	2520	\$0.54	\$0.30	\$0.29
4/8/2020	\$0.31	100	\$0.54	\$0.31	\$0.31
4/7/2020	\$0.28	3125	\$0.54	\$0.28	\$0.18
4/6/2020	\$0.34	N/A	\$0.54	\$0.34	\$0.34
4/3/2020	\$0.34	659	\$0.54	\$0.34	\$0.34
4/2/2020	\$0.32	1982	\$0.54	\$0.34	\$0.28
4/1/2020	\$0.34	528	\$0.54	\$0.34	\$0.34
3/31/2020	\$0.30	202	\$0.54	\$0.30	\$0.30
3/30/2020	\$0.24	3605	\$0.54	\$0.30	\$0.24
3/27/2020	\$0.30	150	\$0.54	\$0.30	\$0.30
3/26/2020	\$0.29	9030	\$0.54	\$0.29	\$0.23
3/25/2020	\$0.29	600	\$0.54	\$0.30	\$0.29
3/24/2020	\$0.30	5803	\$0.54	\$0.30	\$0.25
3/23/2020	\$0.29	561	\$0.54	\$0.29	\$0.29
3/20/2020	\$0.28	4700	\$0.54	\$0.29	\$0.25
3/19/2020	\$0.30	195	\$0.54	\$0.30	\$0.30
3/18/2020	\$0.30	6301	\$0.54	\$0.30	\$0.17
3/17/2020	\$0.30	683	\$0.54	\$0.30	\$0.30
3/16/2020	\$0.20	5791	\$0.54	\$0.37	\$0.20
3/13/2020	\$0.20	4010	\$0.54	\$0.20	\$0.20
3/12/2020	\$0.37	4510	\$0.54	\$0.38	\$0.29
3/11/2020	\$0.36	N/A	\$0.54	\$0.36	\$0.36
3/10/2020	\$0.36	3100	\$0.54	\$0.36	\$0.28
3/9/2020	\$0.39	2500	\$0.54	\$0.39	\$0.39
3/6/2020	\$0.45	N/A	\$0.54	\$0.45	\$0.45
3/5/2020	\$0.45	2200	\$0.54	\$0.45	\$0.21
3/4/2020	\$0.40	630	\$0.54	\$0.40	\$0.33
3/3/2020	\$0.45	2204	\$0.54	\$0.45	\$0.33
3/2/2020	\$0.45	5500	\$0.54	\$0.45	\$0.45
2/28/2020	\$0.45	3996	\$0.54	\$0.45	\$0.25
2/27/2020	\$0.50	N/A	\$0.54	\$0.50	\$0.50
2/26/2020	\$0.50	N/A	\$0.54	\$0.50	\$0.50
2/25/2020	\$0.50	N/A	\$0.54	\$0.50	\$0.50
2/24/2020	\$0.50	278	\$0.54	\$0.50	\$0.25
2/21/2020	\$0.50	N/A	\$0.54	\$0.50	\$0.50
2/20/2020	\$0.50	717	\$0.54	\$0.50	\$0.50
2/19/2020	\$0.45	630	\$0.54	\$0.45	\$0.38
2/18/2020	\$0.50	6500	\$0.54	\$0.50	\$0.38
2/14/2020	\$0.50	1000	\$0.54	\$0.50	\$0.50
2/13/2020	\$0.50	845	\$0.54	\$0.50	\$0.35
2/12/2020	\$0.43	2200	\$0.54	\$0.50	\$0.35

2/11/2020	\$0.50	N/A	\$0.54	\$0.50	\$0.50
2/10/2020	\$0.50	2885	\$0.54	\$0.50	\$0.48
2/7/2020	\$0.50	N/A	\$0.54	\$0.50	\$0.50
2/6/2020	\$0.50	N/A	\$0.54	\$0.50	\$0.50
2/5/2020	\$0.50	698	\$0.54	\$0.50	\$0.50
2/4/2020	\$0.50	2118	\$0.54	\$0.55	\$0.35
2/3/2020	\$0.51	23352	\$0.54	\$0.60	\$0.48
1/31/2020	\$0.47	3700	\$0.54	\$0.48	\$0.42
1/30/2020	\$0.52	N/A	\$0.54	\$0.52	\$0.52
1/29/2020	\$0.52	24050	\$0.54	\$0.80	\$0.35
1/28/2020	\$0.79	1110	\$0.54	\$0.79	\$0.75
1/27/2020	\$0.80	1100	\$0.54	\$0.88	\$0.80
1/24/2020	\$0.82	900	\$0.54	\$0.82	\$0.82
1/23/2020	\$1	105	\$0.54	\$1	\$1
1/22/2020	\$1.08	3000	\$0.54	\$1.08	\$0.82
1/21/2020	\$1.00	600	\$0.54	\$1	\$0.82
1/17/2020	\$1.10	700	\$0.54	\$1.10	\$1
1/16/2020	\$1.06	1300	\$0.54	\$1.21	\$1.02
1/15/2020	\$1.24	9987	\$0.54	\$1.95	\$0.99

NT 10-K 1 ea121891-nt10k_avramedical.htm NOTIFICATION OF LATE FILING

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549**

FORM 12b-25

SEC File Number:
333-216054

NOTIFICATION OF LATE FILING

(Check One) : Form 10-K Form 20-F Form 11-K Form 10-Q Form 10-D Form N-SAR
 Form N-CSR

For Period Ended: **December 31, 2019**

- Transition Report on Form 10-K
- Transition Report on Form 20-F
- Transition Report on Form 11-K
- Transition Report on Form 10-Q
- Transition Report on Form N-SAR

For the Transition Period Ended: _____

Nothing in this form shall be construed to imply that the Commission has verified any information contained herein.

If the notification relates to a portion of the filing checked above, identify the item(s) to which the notification relates:

PART I — REGISTRANT INFORMATION

Avra Medical Robotics, Inc.

Full Name of Registrant

Former Name if Applicable

3259 Progress Drive, Suite 112A

Address of Principal Executive Office (*Street and Number*)

Orlando, FL 32826

City, State and Zip Code

PART II — RULES 12b-25(b) AND (c)

If the subject report could not be filed without unreasonable effort or expense and the registrant seeks relief pursuant to Rule 12b-25(b), the following should be completed. (Check box if appropriate.)

- (a) The reasons described in reasonable detail in Part III of this form could not be eliminated without unreasonable effort or expense;
- (b) The subject annual report, semi-annual report, transition report on Form 10-K, Form 20-F, Form 11-K, Form N-SAR or Form N-CSR, or portion thereof, will be filed on or before the fifteenth calendar day following the prescribed due date; or the subject quarterly report or transition report on Form 10-Q or subject distribution report on Form 10-D, or portion thereof, will be filed on or before the fifth calendar day following the prescribed due date; and
- (c) The accountant's statement or other exhibit required by Rule 12b-25(c) has been attached if applicable.

PART III— NARRATIVE

State below in reasonable detail why the Form 10-K, 20-F, 11-K, 10-Q, 10-D, N-SAR, N-CSR or the transition report portion thereof, could not be filed within the prescribed time period. (Attach extra sheets if needed.)

The compilation, dissemination and review of the information required to be presented in the Annual Report on Form 10-K for the year ended December 31, 2019 could not be completed and filed by May 14, 2020, without undue hardship and expense to the registrant because of the effects of the continued social distancing measures that are in place as a result of the COVID-19 outbreak. The registrant anticipates that it will file its Annual Report on Form 10-K for the year ended December 31, 2019 within the applicable “grace” period provided by Securities Exchange Act Rule 12b-25.

PART IV — OTHER INFORMATION

(1) Name and telephone number of person to contact in regard to this notification

Barry Cohen

954

478-1410

(Name)

(Area Code)

(Telephone Number)

(2) Have all other periodic reports required under Section 13 or 15(d) of the Securities Exchange Act of 1934 or Section 30 of the Investment Company Act of 1940 during the preceding 12 months or for such shorter period that the registrant was required to file such report(s) been filed? If the answer is no, identify report(s). Yes No

(3) Is it anticipated that any significant change in results of operations from the corresponding period for the last fiscal year will be reflected by the earnings statements to be included in the subject report or portion thereof?

Yes No

If so: attach an explanation of the anticipated change, both narratively and quantitatively, and, if appropriate, state the reasons why a reasonable estimate of the results cannot be made.

Avra Medical Robotics, Inc.

(Name of Registrant as Specified in Charter)

Has caused this notification to be signed on its behalf by the undersigned thereunto duly authorized.

Date: May 14, 2020

By: /s/ Barry F. Cohen

Barry F. Cohen
Chief Executive Officer

Prepared By and Return To:
Denise Waites
Distinctive Title Services, Inc.
12012 South Shore Boulevard, Suite 103
Wellington, Florida 33414

File Number: 20-305

Warranty Deed

Made this **December 31, 2020** A.D. By **Julius C. Brecht, III and Candace Brecht**, husband and wife whose address is: [REDACTED] et, Jupiter, FL [REDACTED], hereinafter called the grantor, to **Alexandre Clug and Carol Anne Wilson, husband and wife**, whose post office address is: **150 Waters Edge Drive, Jupiter, Florida 33477**, hereinafter called the grantee.

(Whenever used herein the term "grantor" and "grantee" include all the parties to this instrument and the heirs, legal representatives and assigns of individuals, and the successors and assigns of corporations)

Witnesseth, that the grantor, for and in consideration of the sum of Ten Dollars, (\$10.00) and other valuable considerations, receipt whereof is hereby acknowledged, hereby grants, bargains, sells, aliens, remises, releases, conveys and confirms unto the grantee, all that certain land situate in **Palm Beach County, Florida**, viz:

Lot 13, Block 2, SIMS CREEK, as recorded in Plat Book 30, Page 151, of the Public Records of Palm Beach County, Florida, less and except the following described portion of said Lot 13:

Begin at the Northeast corner of said Lot 13 and run North 88 Degrees 38 Minutes 08 Seconds West, along the North line of said Lot 13 a distance of 90.0 feet; thence South 01 Degrees 59 Minutes 03 Seconds West, a distance of 71.43 feet; thence South 88 Degrees 00 Minutes 57 Seconds East, a distance of 14.09 feet; thence North 52 Degrees 44 Minutes 45 Seconds East, along the common wall of two single story apartments and its extensions thereof, a distance of 60.00 feet; thence South 88 Degrees 00 Minutes 57 Seconds East, a distance of 29.70 feet; thence North 01 Degrees 59 Minutes 03 Seconds East, along the East line of said Lot 13, a distance of 34.60 feet to the Point of Beginning.

Parcel ID Number: **30-42-41-02-10-002-0131**

Together with all the tenements, hereditaments and appurtenances thereto belonging or in anywise appertaining.


To Have and to Hold, the same in fee simple forever.

And the grantor hereby covenants with said grantee that the grantor is lawfully seized of said land in fee

simple; that the grantor has good right and lawful authority to sell and convey said land; that the grantor hereby fully warrants the title to said land and will defend the same against the lawful claims of all persons whomsoever; and that said land is free of all encumbrances except taxes accruing subsequent to December 31, 2020.

In Witness Whereof, the said grantor has signed and sealed these presents the day and year first above written.

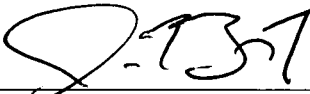
Signed, sealed and delivered in our presence:



Witness Printed Name Denise Waites




Witness Printed Name MARY P. GREIFEL



(Seal)

Julius C. Brecht, III

Address:



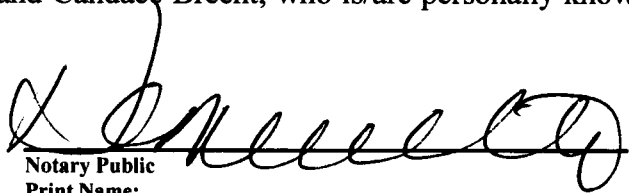
(Seal)

Candace Brecht

Address:

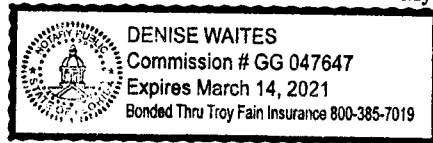
State of FLORIDA
County of PALM BEACH

The foregoing instrument was acknowledged before me by means of physical presence or online notarization, this 31st day of December, 2020, by Julius C. Brecht, III and Candace Brecht, who is/are personally known to me or who has produced Drivers License as identification.



Notary Public
Print Name: _____

My Commission Expires: _____



CERTIFICATE OF SERVICE

Pursuant to Rule 151(d) of the Commission's Rules of Practice and the Commission's Order in re: Pending Administrative Proceedings dated March 18, 2020, I, Ibrahim Bah, hereby certify that on January 15, 2021, I caused the following documents to be sent:

- The Division of Enforcement's Brief in Opposition to Respondent Clug's Motion for Reconsideration dated January 15, 2021;
- Appendix dated January 15, 2021; and
- Certificate of Service and Certificate of Compliance.

By email to:

Office of the Secretary at apfilings@sec.gov

Alexandre S. Clug, *Pro Se*, via email at aclug@thedolphingroupllc.com.

Dated: January 15, 2021
New York, New York

Respectfully submitted,

DIVISION OF ENFORCEMENT

/s Ibrahim Bah

Ibrahim Bah - (212) 336-0418
SECURITIES AND EXCHANGE COMMISSION
New York Regional Office
200 Vesey Street, Suite 400
New York, NY 10281

CERTIFICATE OF COMPLIANCE

I hereby certify pursuant to Rule 450(d) of the Commission's Rules of Practice that the Division of Enforcement's Opposition Brief to Respondent Clug's Motion for Reconsideration complies with the length limitations set forth in the Commission's Order Requesting Additional Written Submissions dated December 15, 2020. The Division's Response is 1,895 words.

/s David Stoelting
David Stoelting