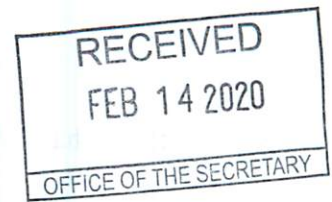


**HARD COPY**



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

**ADMINISTRATIVE PROCEEDING  
File No. 3-16386**

**In the Matter of**

**TRACI J. ANDERSON, CPA  
TIMOTHY W. CARNAHAN  
AND CYIOS CORPORATION,**

**Respondents.**

**DIVISION OF ENFORCEMENT'S BRIEF  
IN OPPOSITION TO CYIOS  
CORPORATION PETITION FOR  
REVIEW**

The Commission should reject Respondent CYIOS Corporation Petition for Review (the "Petition") and affirm the Initial Decision entered by Judge Grimes on January 10, 2020. Judge Grimes correctly found that Respondent CYIOS Corporation ("CYIOS") violated, and Respondent Timothy Carnahan ("Carnahan") caused its violations of, Section 17(a)(3) of the Securities Act of 1933 (the "Securities Act"), Section 13(a) of the Securities Exchange Act of 1934 (the "Exchange Act"), and Exchange Act Rules 13a-1 and 13a-13. Judge Grimes also found that Carnahan violated Exchange Act Rules 13a-14 and 13a-15(c). The facts supporting the Initial Decision remain undisputed and the Commission should thus reject the Petition.

**Summary of Relevant Procedural History**

The Commission instituted this administrative proceeding on February 13, 2015.<sup>1</sup> After a hearing, initial decision, and eventual reassignment to Judge James E. Grimes, Judge Grimes conducted a second hearing and issued another Initial Decision on January 10, 2020.<sup>2</sup> The Initial

<sup>1</sup> Traci J. Anderson, CPA, I.D. Rel. No. 930, 2015 SEC LEXIS 5189.

<sup>2</sup> Anderson, I.D. Rel. No. 1394. For a more detailed recitation of the procedural background prior to the hearing before Judge Grimes, see the Division of Enforcement's Post-Hearing Brief, Dkt. 110, pp. 2-3.

Decision found that CYIOS violated, and Carnahan caused CYIOS's violations of, Section 17(a)(3) of the Securities Act, Section 13(a) of the Exchange Act, and Exchange Act Rules 13a-1 and 13a-13. In addition, Judge Grimes found that Carnahan personally violated Exchange Act Rules 13a-14 and 13a-15(c). Judge Grimes issued cease-and-desist orders to CYIOS and Carnahan related to each violation of the securities laws. Judge Grimes further ordered CYIOS and Carnahan to pay civil penalties of \$500,000 and \$100,000, respectively. CYIOS was additionally ordered to disgorge \$37,500 plus prejudgment interest.

On January 13, 2020, Carnahan, purportedly on behalf of Respondents, filed a (1) Motion to Strike/Dismiss Order (Initial Decision) and Dismiss case, and (2) Motion for Recusal. On January 17, 2020, Carnahan filed a Motion to Correct Manifest Errors of Fact on behalf of Respondents. Judge Grimes denied the Respondents' Motion for recusal, and Motion to Correct Manifest Errors of Fact. Because Respondents' Motion to Strike/Dismiss the Initial Decision was filed after the initial decision and because it did not allege errors of fact in the Initial Decision, Judge Grimes ruled that he could not adjudicate that motion.<sup>3</sup>

On February 3, 2020, Florida attorney Jonathan D. Leinwand filed a Petition for Review of Initial Decision.<sup>4</sup> In that document, Leinwand claims to represent CYIOS and further claims that David Greene purchased the company from Carnahan on August 30, 2019 – after the hearing but before the Initial Decision. Leinwand asserts that Carnahan is no longer involved with CYIOS. Leinwand argues that because CYIOS is under new ownership and management, the Commission erred in ordering remedies against the company based on likelihood of future offenses.

---

<sup>3</sup> See Anderson, Admin. Proc. Rulings Release No 6728 (ALJ Jan. 30, 2020); Admin. Proc. Rulings Release No 6729 (ALJ Jan. 31, 2020).

<sup>4</sup> Because Leinwand did not send Division counsel a copy of his Petition, Division counsel did not discover the filing until February 7, 2020.

Confusing matters further, on February 10, 2020, Carnahan filed a “Motion to Strike/Remove from Record: FRAUDELENT [*sic*] FILING WITH FORGED SIGNATURES CYIOS Corporation’s Petition for Review of Initial Decision” claiming that Leinwand’s Petition was fraudulent. Likewise, on February 10, 2020, Carnahan and Leinwand copied the Division on electronic correspondence in which Carnahan claims that he “ABSOLUTELY DID NOT SIGN THOSE DOCUMENTS!!!” in response to Leinwand presenting him with an Asset Purchase Agreement, purportedly between Carnahan and David Greene. These emails are attached hereto for reference as Exhibit A.

#### Argument

Respondents have had two hearings and innumerable opportunities to present their case in this matter. As the Administrative Law Judge has often ruled, there is no evidence to counter the findings of the Initial Decision. Accordingly, it would be a tremendous waste of Commission resources to repeat or continue litigation of these issues.

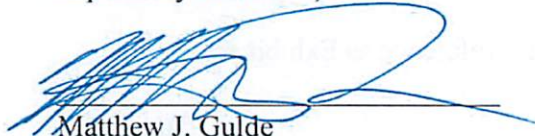
Leinwand’s Petition contains agreements purporting to show the sale of CYIOS to David Greene. But the Petition contains no declaration of Mr. Greene to authenticate the documents. Nor does Leinwand or Greene explain the circumstances of the sale or explain how both of them failed to discover – until after deadlines for post-hearing briefing – that CYIOS was even involved in this administrative proceeding. The docket of this case, with links to all documents filed, has been freely available at [www.sec.gov](http://www.sec.gov).<sup>5</sup> Counsel for the Division called Leinwand on February 7 and left a message asking for more explanation of these matters. Leinwand has not responded. In the meantime, as noted above, Carnahan has vigorously denied the authenticity of the so-called sales agreements.

---

<sup>5</sup> In Fact, a Google search for “CYIOS SEC” or “CYIOS litigation” yields, as the first item returned, the docket for this case: <https://www.sec.gov/litigation/apdocuments/ap-3-16386.xml>.

There is simply no basis in the record to contest the findings of the Initial Decision. Leinwand's eleventh-hour Petition does not change that fact. To find otherwise would needlessly waste Commission resources. Granting the Petition's relief would be particularly inappropriate in this case, where Respondents have had multiple opportunities to present evidence and arguments to the administrative law judge, including evidence of any anticipated sale of CYIOS. The Commission should reject the Petition.

Respectfully submitted,



Matthew J. Gulde  
Illinois Bar No. 6272325  
United States Securities and  
Exchange Commission  
Fort Worth Regional Office  
Burnett Plaza, Suite 1900  
801 Cherry Street, Unit 18  
Fort Worth, Texas 76102  
(817) 978-1410  
(817) 978-4927 (facsimile)

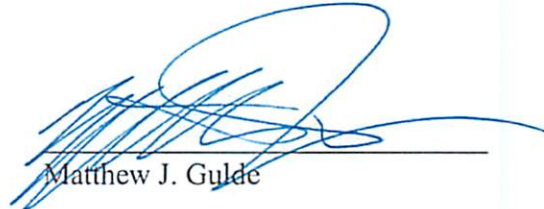
SERVICE LIST

Pursuant to Rule 150 of the Commission's Rules of Practice, I hereby certify that a true and correct copy of the Division of Enforcement's Brief in Opposition of Cyios Petition for Review Respondents was served on February 13, 2020, via either electronic mail or United Parcel Service, Overnight Mail, as indicated below

Honorable James E. Grimes  
Administrative Law Judge  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549-2557

Timothy W. Carnahan, Individually and as  
President, CEO and Chairman  
CYIOS Corporation  
Ronald Reagan Building  
1300 Pennsylvania Ave., 700  
Washington DC 20004  
*Via Electronic Mail*

Johnathan D. Leinwand  
Jonathan D. Leinwand, P.A.  
18851 NE 29<sup>th</sup> Ave.  
Suite 1011  
Aventura, FL 33180



Matthew J. Gulde

# EXHIBIT A

## Stewart, Angelia L.

---

**From:** Timothy Carnahan <carnahan@cyios.com>  
**Sent:** Monday, February 10, 2020 10:35 AM  
**To:** AL; jonathan@jdlpa.com; Stewart, Angelia L.; Gulde, Matthew  
**Subject:** Fraudulent Filing : CYIOS Corporation : 3-16386  
**Attachments:** NevadaFraudulentFilings.pdf; 3-16386-event-153-Fraudulent-filing.pdf; MotionToStrike-andRemoveFraudulentFiling.pdf

**Importance:** High

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

There has been a fraudulent filing in our case - I've attached the filing and the complaint with Secretary of State of Nevada.

Timothy Carnahan | CEO  
carnahan@cyios.com  
202-369-1984





BARBARA K. CEGAVSKE  
Secretary of State  
Commercial Recordings Division  
Attn: Fraudulent Filings  
202 North Carson Street  
Carson City, Nevada 89701-4201  
Website: [www.nvsilverflume.gov](http://www.nvsilverflume.gov)

## General Instructions for Forged or Fraudulent Filing Complaints

NRS 225.084 allows the Secretary of State's office to investigate complaints and take administrative action regarding Commercial Recordings documents offered to the Secretary of State for filing by person(s) unknown to an entity that are alleged to be in violation of NRS 225.084; the offering for filing to the Secretary of State a forged or fraudulent document.

Actions subject to complaint and possible administrative action pursuant to NRS 225.084 include without limitation the listing, without consent, of:

- The name or signature or address of a person as officer, director, registered agent, incorporator or other formal affiliate of an entity on any record filed with the Secretary of State;
- The filing of any record on an entity existing on file with the Secretary of State without the statutory authority as provided by Title 7 of NRS; the forgery or fraudulent alteration of records;
- The filing of records in bad faith or for the purpose of harassing or defrauding a person; and
- The filing of records that contain a false statement of material fact.

*The filing of a complaint is not intended for settling internal disputes between former or current business partners, spouses, family members, friends/acquaintances, co-workers, competitors, etc.  
Please seek legal counsel for any legal advice you may require.*

The complaint must be submitted on a form prescribed by the Secretary of State.

Upon receipt of the complaint, the Secretary of State will review the complaint and determine whether the complaint may be resolved through the administrative process and if the complaint should be referred to another regulatory or enforcement agency for further investigation.

The Secretary of State may refer the information obtained in a complaint or through the associated investigation to other entities for further investigation.

After review if the Secretary of State determines the complaint may be resolved through the administrative process the complainant will receive a letter acknowledging receipt of the complaint. A letter and a form requesting information will then be sent to the "respondent" (person who offered the documents to the Secretary of State allegedly in violation of NRS 225.084).

The respondent has 30 days from the date of the letter to respond. If there is no response the Secretary of State may find the allegations to be valid and may correct the record and the information at issue in the database and on the website.

Please remit to:

Secretary of State  
Commercial Recordings Division  
Attn: Fraudulent Filings  
202 N. Carson Street  
Carson City, Nevada 89701-4201

Or

Email: [sos-crfraudcomplaints@sos.nv.gov](mailto:sos-crfraudcomplaints@sos.nv.gov)



BARBARA K. CEGAVSKE  
Nevada Secretary of State  
Commercial Recordings Division



**Forged or Fraudulent  
Filing Complaint Form  
Pursuant to NRS 225.084**

**This form may be downloaded or completed online before printing. If you are unable to do so, please contact Customer Service at (775) 684-5708 for guidance.**

**Instructions:** (read General Information sheet **before** submitting complaint)

- 1) Complete and print this form
- 2) Attach/Include necessary information (see section 4)
- 3) Mail or email to:

Secretary of State  
Commercial Recordings Division  
Attn: Fraudulent Filings  
202 N. Carson Street  
Carson City, NV 89701-4201

Contact Information:  
Telephone: 775-684-5708  
Fax: 775-684-5725  
Website: [www.nvsilverflume.gov](http://www.nvsilverflume.gov)

Email: [sos-crfraudcomplaints@sos.nv.gov](mailto:sos-crfraudcomplaints@sos.nv.gov)

*The Division may begin an investigation upon receipt of this form. All information provided is deemed confidential and will not be available for public inspection except otherwise required by law.*

**SECTION 1: Complainant Information (required)**

Title:  Mr.  Mrs.  Ms.  Miss

carnahan Timothy  
Last Name First Name Middle Name

2885 Sanford Ave SW #28464 Grandville MI 49418  
Street City State Zip

Contact Phone Number: 2023691984

Additional Contact Information:  
(cell phone, email address, etc.)

Affiliation with entity or position held: (officer, director, shareholder, employee, client, partner, manager/member, etc.)

Officer, director and CEO

**SECTION 2: Information About Forged or Fraudulent Filing**

Name of entity that the false or forged filing affected: (name as registered with this office)

CYIOS Corporation

Entity File Number: 20190191296 and 20190194729

Document you believe is forged or fraudulent:\*

Name of document:  Date filed:

Reason you believe document is forged or fraudulent:

Because I never reinstated the company - I have been fighting the SEC in a case 3-16386. <https://www.sec.gov/litigation/apdocuments/ap-3-16386.xml>

General Information: Please provide names, if known, of all persons involved in the alleged violation(s):\*

<input type="text" value="greene"/>	<input type="text" value="David"/>	<input type="text"/>
Last Name	First Name	Middle Name
<input type="text" value="CYIOS"/>	<input type="text"/>	<input type="text" value="8479485431"/>
Firm Name/Doing Business As	Position/Title	Telephone
<input type="text" value="18851 NE 29th Ave Suite 1011"/>	<input type="text" value="Aventura"/>	<input type="text" value="FL"/> <input type="text" value="33180"/>
Street	City	State Zip

Web site and Email address:

Indicate any relationship between the complainant and all persons involved in the alleged violation(s) and the reasons you believe they are involved: (check all boxes that apply)\*\*

- Competitor  
 Friend/Acquaintance  
 Family/Relative  
 Spouse/Ex-Spouse  
 Business Partner  
 Co-worker  
 None  
 Other (please explain below)

**\*\*If a box other than "None" is checked in Section 2, the Secretary of State may not investigate the complaint because it may be considered a private matter. The Secretary of State's Office does not have the legal staff to determine the legitimacy of a filing when the parties involved have inherent knowledge of one another as there may be agreements in place that the Secretary of State is not aware of. The filing of a complaint is not intended for settling internal disputes between former or current business partners, spouses, family members, friends/acquaintances, co-workers, competitors, etc. Please seek legal counsel for any legal advice you may require.**

**SECTION 3: Additional Information**

Please provide any additional information which the complainant believes may be helpful in the investigation of the alleged violation(s):\*

I believe maybe since the SEC case has taken so long, these people thought they could scheme the company and start trading which they have done as of this date. What was most interesting is that when the SEC Initial Decision came out January 10th, 2020 - they must have noticed the substantial fine for the company being over 500,000. So, in my humble opinion, they are trying to intervene as a means to save face or maybe this group is a victim of fraud too. Nevertheless, this reinstatement is fraudulent. The company Incorp Services, Inc is the appears to be the registered agent who filed these two

\*attach additional pages, if needed

Have you filed a complaint or report with any other regulatory entity or agency, or with an attorney?

No  Yes, details are provided below

I will be filing with the SEC Secretary request to remove the fraudulent filing from the case. I have exhausted all my finances to fight the SEC and this compliant letter is in hopes to correct the fraud.  
I also did ask my old Registered Agent below what to do and this is how I found this form.  
American Corporate Enterprises, Inc.  
123 W. Nye Lane, Suite 129  
Carson City, NV 89705  
Toll Free (888) 274-1130 / (775) 884-0280

**SECTION 4: Attachments**


Attach photocopies of any additional information that might be useful in investigating this complaint or alleged violation(s). Documentary evidence is especially important. Please do not send originals as we cannot be responsible for their safekeeping.

Are you willing to testify in a court of Law or administrative proceeding regarding this complaint?  
 YES  NO

**DECLARATION:**

In filing this complaint, I declare under penalty of perjury under the Laws of Nevada that the information provided in this complaint is true and correct to the best of my knowledge and that the information may be used by the Secretary of State and other entities to further investigate the complaint or alleged violation(s) of NRS 225.084.

Timothy W. Camahan  
Printed Name of Complainant



2020-02-06  
Date

**Signature of Complainant**

**IF THIS COMPLAINT WAS PREPARED BY SOMEONE ON BEHALF OF THE COMPLAINANT, PLEASE INDICATE WHO PREPARED THIS REPORT**

\_\_\_\_\_  
Last Name First Name Middle Name

\_\_\_\_\_  
Name of Organization Contact Phone Number:

\_\_\_\_\_  
Street City State Zip

\_\_\_\_\_  
**Signature of Person Who Prepared Report** Date

Please make sure your response: - is complete, printed and legible  
- is signed by the Complainant  
- includes all photocopied attachments

**Stewart, Angelia L.**

---

**From:** Jonathan Leinwand <jonathan@jdlpa.com>  
**Sent:** Monday, February 10, 2020 10:43 AM  
**To:** Timothy Carnahan; ALJ; Stewart, Angelia L.; Gulde, Matthew  
**Subject:** Re: Fraudulent Filing : CYIOS Corporation : 3-16386  
**Attachments:** Asset Purchase Agreement, Ex A, resolutions.pdf

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Carnahan,

Are you claiming that you did not execute the attached documents with your notarized signature?

--  
Jonathan Leinwand, Esq.

[jonathan@jdlpa.com](mailto:jonathan@jdlpa.com)

Jonathan D. Leinwand, P.A.

18851 NE 29th Ave.  
Suite 1011  
Aventura, FL 33180  
Tel (954) 903-7856  
Fax (954) 252-4265

\*\*\*\*\*  
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---

**From:** Timothy Carnahan <carnahan@cyios.com>  
**Date:** Monday, February 10, 2020 at 11:35 AM  
**To:** ALJ <ALJ@SEC.GOV>, Jonathan Leinwand <jonathan@jdlpa.com>, "Stewart, Angelia L." <StewartAn@SEC.GOV>, "Gulde, Matthew" <GuldeM@SEC.GOV>  
**Subject:** Fraudulent Filing : CYIOS Corporation : 3-16386

There has been a fraudulent filing in our case - I've attached the filing and the complaint with Secretary of State of Nevada.

Timothy Carnahan | CEO  
carnahan@cyios.com  
202-369-1984



**Stewart, Angelia L.**

---

**From:** Timothy Carnahan <carnahan@cyios.com>  
**Sent:** Monday, February 10, 2020 10:58 AM  
**To:** Jonathan Leinwand; ALJ; Stewart, Angelia L.; Gulde, Matthew  
**Subject:** Re: Fraudulent Filing : CYIOS Corporation : 3-16386

**Importance:** High

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

ABSOLUTELY DID NOT SIGN THOSE DOCUMENTS!!!

Timothy Carnahan | CEO  
carnahan@cyios.com  
202-369-1984



---

**From:** Jonathan Leinwand <jonathan@jdlpa.com>  
**Sent:** Monday, February 10, 2020 11:43 AM  
**To:** Timothy Carnahan <carnahan@cyios.com>; ALJ <ALJ@SEC.GOV>; Stewart, Angelia L. <StewartAn@SEC.GOV>; Gulde, Matthew <GuldeM@SEC.GOV>  
**Subject:** Re: Fraudulent Filing : CYIOS Corporation : 3-16386

Mr. Carnahan,

Are you claiming that you did not execute the attached documents with your notarized signature?

--  
Jonathan Leinwand, Esq.

[jonathan@jdlpa.com](mailto:jonathan@jdlpa.com)

Jonathan D. Leinwand, P.A.

18851 NE 29th Ave.  
Suite 1011  
Aventura, FL 33180  
Tel (954) 903-7856  
Fax (954) 252-4265

\*\*\*\*\*

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---

**From:** Timothy Carnahan <carnahan@cyios.com>

**Date:** Monday, February 10, 2020 at 11:35 AM

**To:** ALJ <ALJ@SEC.GOV>, Jonathan Leinwand <jonathan@jdlpa.com>, "Stewart, Angelia L."

<StewartAn@SEC.GOV>, "Gulde, Matthew" <GuldeM@SEC.GOV>

**Subject:** Fraudulent Filing : CYIOS Corporation : 3-16386

There has been a fraudulent filing in our case - I've attached the filing and the complaint with Secretary of State of Nevada.

**Timothy Carnahan | CEO**

**carnahan@cyios.com**

**202-369-1984**



## Stewart, Angelia L.

---

**From:** Timothy Carnahan <carnahan@cyios.com>  
**Sent:** Monday, February 10, 2020 11:23 AM  
**To:** Jonathan Leinwand; ALJ; Stewart, Angelia L.; Gulde, Matthew  
**Subject:** Re: Fraudulent Filing : CYIOS Corporation : 3-16386  
**Attachments:** IC3 Complaint-FBI.pdf

**Importance:** High

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Compliant issued to FBI - see attached!  
I only include the SEC for reference.

Timothy Carnahan | CEO  
carnahan@cyios.com  
202-369-1984



---

**From:** Jonathan Leinwand <jonathan@jdlpa.com>  
**Sent:** Monday, February 10, 2020 11:43 AM  
**To:** Timothy Carnahan <carnahan@cyios.com>; ALJ <ALJ@SEC.GOV>; Stewart, Angelia L. <StewartAn@SEC.GOV>; Gulde, Matthew <GuldeM@SEC.GOV>  
**Subject:** Re: Fraudulent Filing : CYIOS Corporation : 3-16386

Mr. Carnahan,

Are you claiming that you did not execute the attached documents with your notarized signature?

—  
Jonathan Leinwand, Esq.

[jonathan@jdlpa.com](mailto:jonathan@jdlpa.com)

Jonathan D. Leinwand, P.A.

18851 NE 29th Ave.  
Suite 1011  
Aventura, FL 33180  
Tel (954) 903-7856  
Fax (954) 252-4265

\*\*\*\*\*

This e-mail, and any attachments to this e-mail, is intended only for use by the person or entity to which it is addressed and may contain confidential and/or legally privileged material. Any review, retransmission, dissemination, copying, or other use of, or taking of any action in reliance upon, this e-mail, and any attachments hereto, by persons or entities other than the intended recipient is strictly prohibited. If you received this in error, please contact the sender and permanently delete the original from any computer and destroy any printout thereof.

---

**From:** Timothy Carnahan <carnahan@cyios.com>

**Date:** Monday, February 10, 2020 at 11:35 AM

**To:** ALJ <ALJ@SEC.GOV>, Jonathan Leinwand <jonathan@jdlpa.com>, "Stewart, Angelia L." <StewartAn@SEC.GOV>, "Gulde, Matthew" <GuldeM@SEC.GOV>

**Subject:** Fraudulent Filing : CYIOS Corporation : 3-16386

There has been a fraudulent filing in our case - I've attached the filing and the complaint with Secretary of State of Nevada.

**Timothy Carnahan | CEO**

**carnahan@cyios.com**

**202-369-1984**







## Complaint Referral Form Internet Crime Complaint Center

### Victim Information

Name: Timothy W. Carnahan  
Are you reporting on behalf of a business? Yes  
Business Name: CYIOS Corporation  
Is the incident currently impacting business operations? Yes  
Age: 50 - 59  
Address: 2885 Sanford Ave SW #28464  
Address (continued):  
Suite/Apt./Mail Stop:  
City: Grandville  
County:  
Country: United States of America  
State: Michigan  
Zip Code/Route: 49418  
Phone Number: 2023691984  
Email Address: carnahan@cyios.com  
Business IT POC, if applicable:  
Other Business POC, if applicable:

### Description of Incident

Provide a description of the incident and how you were victimized. Provide information not captured elsewhere in this complaint form.

While we are fighting our case with the SEC Securities Exchange Commission, we noticed someone filed in our case acting like the Company.

We filed a complaint with the Secretary of State Nevada and Secretary of Securities Exchange Commission.

Which of the following were used in this incident? (Check all that apply.)

- Spoofed Email
- Similar Domain
- Email Intrusion
- Other Please specify:

*Law enforcement or regulatory agencies may desire copies of pertinent documents or other evidence regarding your complaint.*

*Originals should be retained for use by law enforcement agencies.*

### Information About The Subject(s) Who Victimized You

Name: Timothy Carnahan

Business Name: CYIOS Corporation  
Address: 2885 Sanford Ave SW #28464  
Address (continued):  
Suite/Apt./Mail Stop:  
City: Grandville  
Country: United States of America  
State: Michigan  
Zip Code/Route: 49418  
Phone Number: 2023691984  
Email Address: Carnahan@cyios.com  
Website:  
IP Address:

#### Other Information

If an email was used in this incident, please provide a copy of the entire email including full email headers.

This person Jonathan seems to be the lawyer of Mr. Greene, David. Jonathan is who filed this fraudulent filing with the SEC.

20900 Northeast 30th Avenue, 8th Floor, Aventura, FL, United States

Phone: +1.954.903.7856

Email: jonathan@jdlpa.com

<https://www.sec.gov/litigation/apdocuments/3-16386-event-153.pdf>

Are there any other witnesses or victims to this incident?

[No response provided]

If you have reported this incident to other law enforcement or government agencies, please provide the name, phone number, email, date reported, report number, etc.

Yes Friday and Today - We filed a complaint with the Secretary of State Nevada and Secretary of Securities Exchange Commission and with the fraudulent filer: jonathan@jdlpa.com

Check here if this an update to a previously filed complaint:

#### Who Filed the Complaint

Were you the victim in the incident described above? Yes

#### Digital Signature

By digitally signing this document, I affirm that the information I provided is true and accurate to the best of my knowledge. I understand that providing false information could make me subject to fine, imprisonment, or both. (Title 18, U.S. Code, Section 1001)

Digital Signature: Timothy W. Carnahan

Thank you for submitting your complaint to the IC3. Please save or print a copy for your records. ***This is the only time you will have to make a copy of your complaint.***