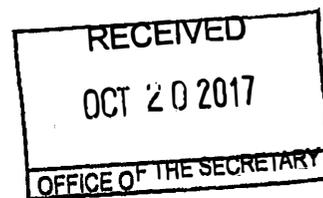


UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING  
File No. 3-17990

In the Matter of

Digital Brand Media & Marketing Group,  
Inc., *et al.*,

Respondents.

**DIVISION OF ENFORCEMENT'S RESPONSIVE POST-HEARING BRIEF**

The Division of Enforcement ("Division"), by counsel, pursuant to the Post-Hearing Order and Rule of Practice 340, respectfully submits its Responsive Post-Hearing Brief.

**Introduction**

Digital Brand's Post-Hearing Brief does not even attempt to challenge the Division's case establishing that all of the *Gateway*<sup>1</sup> factors prove that revocation is the appropriate sanction for the Respondent's two years of delinquency in its periodic reports. It is too late for Digital Brand to catch up on its multiple delinquent periodic reports, even

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<sup>1</sup> *Gateway International Holdings, Inc.*, Securities Exchange Act Rel. No. 53907, 2006 SEC LEXIS 1288 at \*19-\*20 (May 31, 2006) (quoting *SEC v. Beisinger Indus. Corp.*, 552 F.2d 15, 18 (1<sup>st</sup> Cir. 1977)).

if it could, and avoid revocation.<sup>2</sup> Instead, Digital Brand raises meritless procedural issues, some for the second time, in hopes that something may save it from revocation.

### Argument

#### **1. This is a case of a badly performing company, not bad luck.**

Digital Brand is a company that never made a profit, whose Executive Director admitted to choosing to repeatedly using toxic lending and spending its limited funds on protracted litigation with its toxic lender, Asher Enterprises, Inc., rather than filing its required periodic reports to inform investors of its status. The company also failed to apply for the hardship exemption provided by 17 CFR §232.202, yet Digital Brand improperly claims it is entitled to receive the exemption from this Court.

#### **2. Digital Brand knew well before the hearing that Assurance Dimensions was not its auditor.**

Digital Brand claims that its “new certifying accountant Assurance Dimensions disclaims any relationship with Respondent for the first time on [the] stand testifying at the hearing, after working on an 8K with the Respondent stating that Assurance Dimensions was the new certifying accountant for the Respondent.” (Digital Brand’s Post-Trial Memorandum at 4.) That is not true. The Declaration in support of the Division’s Motion for Summary Disposition, filed and served on Respondent on June 28, 2017, stated that Assurance Dimension partners Mitch Pruzansky and Michael Naparstek told Division counsel on June 27, 2017 “that Assurance Dimension, Inc. had not yet been

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<sup>2</sup>See *Absolute Potential, Inc.*, 2014 SEC LEXIS 1193 at \*16-\*32 (April 4, 2014), and related cases cited in the Division’s Post-Hearing Brief at 23.

engaged by Digital Brand because Assurance Dimension, Inc. had not completed its client acceptance procedures, had not been paid, and had not issued any engagement letters.” (Declaration, ¶ 11).

**3. The OIP issued by the Secretary on behalf of the Commission establishes that the Commission authorized this administrative proceeding.**

There is no support for Digital Brand’s argument that the Division “had no formal authorization to move proceedings forward.” (Digital Brand’s Post-Trial Memorandum at 6.) The Commission authorized a litigated action against Digital Brand and directed the Secretary of the Commission to issue the OIP in this case which was duly served on Digital Brand. The allegations in the OIP were supported by EDGAR and other publicly available information. Thus, Digital Brand’s argument that the Division had to request a Formal Order of Investigation granting it subpoena power is simply a red herring. *See* SEC Division of Enforcement Manual, Sections 2.3.3. and 2.3.4.<sup>3</sup>

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<sup>3</sup> *See also* Harnisch and Colton, ABA Business Law Section, Volume 15, Number 1, September/October 2005:

Generally, investigations begin as “informal” investigations. An investigation's designation as “informal” does not mean that the matter is not serious. In fact, the commission can opt to take enforcement action without an informal investigation ever becoming “formal.” The “informal” designation simply means that the enforcement staff cannot issue subpoenas to compel the production of documents or investigative testimony, which is an on-the-record question-and-answer session similar to a deposition.

An investigation becomes “formal” when the SEC issues a formal order of investigation (formal order). Such an order empowers the enforcement staff to issue subpoenas compelling investigative testimony and the production of documents.

**4. The Division provided Digital Brand with Rule 230 discovery on July 17, 2017, and provided copies of all hearing subpoenas and documents produced thereto before the hearing.**

Digital Brand complains that the Division failed to provide material mandated to be disclosed by Rule 230. In order to respond to these new complaints by Digital Brand, which were not raised at the final prehearing conference or at the August 9, 2017 hearing in this case, the Division is attaching to this brief a declaration and exhibits refuting these inaccurate complaints.

On May 18, 2017, Digital Brand was served by Priority Mail Express with the OIP in this case along with a May 17, 2017 letter from the Division offering discovery to Digital Brand pursuant to Rule of Practice 230. (Division of Enforcement's Declaration in Support of Responsive Post-Hearing Brief ("Div. Decl."), Exhibit ("Ex.") 1, attached hereto).

On July 17, 2017, the Division emailed a letter to Digital Brand's counsel responding to Digital Brand's July 14, 2017 discovery request, attached several documents that were produced, and included a Withheld Document List listing privileged documents by category pursuant to Rule of Practice 230. (Div. Decl. Ex. 2, attached hereto).

Digital Brand also complains that it was not provided with all of the hearing subpoenas. Respondent's counsel was copied on the July 7, 2017 email from the Division to the Court attaching the six hearing subpoenas to witnesses Boisseau, Gray, James, Pruzansky, Naparstek, and Perry. (Div. Decl. Ex. 3).

On July 31, 2017, the Division provided Respondent's counsel with an electronic drop box by Accellion which contained all of the documents that were produced to the Division by Messrs. Boisseau, Pruzansky, and Naparstek in response to the hearing subpoenas. On August 2, 2017, Division counsel informed the Court that the subpoenaed documents had been obtained and served electronically on the Respondent. (August 2, 2017 Final Prehearing Conference Tr. 19:8-11). The Accellion database maintained by the Commission shows that Respondent's counsel, using his email address as a username, downloaded the file on August 7, 2017. (Div. Decl. Exs. 4 and 5). As stated above, the Division did not obtain a formal order of investigation in this case, and therefore had no investigative testimony transcripts or documents produced by any investigative subpoenas.<sup>4</sup>

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<sup>4</sup> Digital Brand claims in its brief that the Division failed to provide it with *Brady* material. The Division had no *Brady* material, and if Respondent's counsel had reason to believe the Division had *Brady* material, he should have raised the issue at the August 2, 2017 final prehearing conference. The Court advised counsel that "a final prehearing conference, typically in my practice, would be to address anything that's pending before we have the trial." (August 2, 2017 Prehearing Conf. Tr. at 5:23-25). The Court said, "Now, Mr. Schichtman, I want to give you an opportunity to address any issues that we have not already addressed." Mr. Shichtman replied: "No, Your Honor, I think I understand perfectly where I stand on this." (*Id.* at 27:11-15).

**Conclusion**

For the reasons set forth above, and in its initial Post-Hearing Brief, the Division respectfully requests that the Administrative Law Judge revoke the registration of each class of Digital Brand's securities registered under Exchange Act Section 12.

Dated: October 20, 2017

Respectfully submitted,



Kevin P. O'Rourke (202) 551-4442  
Neil J. Welch, Jr. (202) 551-4731  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549-6010

COUNSEL FOR  
DIVISION OF ENFORCEMENT

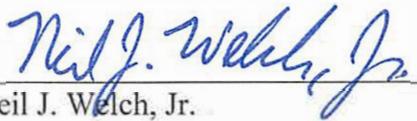
CERTIFICATE OF SERVICE

I hereby certify that true copies of the Division of Enforcement's Responsive Post-Hearing Brief and attached Declaration of Neil J. Welch, Jr. in Support of Division of Enforcement's Responsive Post-Hearing Brief were served on the following on this 20th day of October, 2017, in the manner indicated below:

By Email:

The Honorable Jason S. Patil  
Administrative Law Judge  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549-2557  
[alj@sec.gov](mailto:alj@sec.gov)

Marshal Shichtman, Esq.  
Marshal Shichtman & Associates, P.C.  
1 Old Country Rd., Suite 360  
Carle Place, NY 11514  
(Counsel for Respondent)  
[marshal@lawmsa.com](mailto:marshal@lawmsa.com)

  
\_\_\_\_\_  
Neil J. Welch, Jr.

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

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-17990**

<p><b>In the Matter of</b></p> <p><b>Digital Brand Media &amp; Marketing Group, Inc., <i>et al.</i>,</b></p> <p><b>Respondents.</b></p>
---

**DECLARATION OF NEIL J. WELCH, JR. IN SUPPORT OF  
DIVISION OF ENFORCEMENT'S RESPONSIVE POST-HEARING BRIEF**

NEIL J. WELCH, JR., pursuant to 28 U.S.C. § 1746, declares:

1. I am a Senior Investigations Counsel with the Division of Enforcement ("Division") of the Securities and Exchange Commission ("Commission"), and co-counsel for the Division in the above-captioned administrative proceeding. I submit this Declaration in support of the Division's Responsive Post-Hearing Brief to respond to new complaints made by respondent Digital Brand Media & Marketing Group, Inc. ("Digital Brand") in its Post-Trial Memorandum which were not raised at the final prehearing conference or at the August 9, 2017 hearing in this case.

2. Attached hereto as Exhibit 1 is a true copy of a May 17, 2017 letter from me to Digital Brand offering it discovery under Rule of Practice 230. The letter was served on Digital Brand with the Order Instituting Proceedings via Priority Mail Express on May 18, 2017.

3. Attached hereto as Exhibit 2 is a true copy of a letter from me to Digital Brand's counsel dated July 17, 2017, in which I respond to Digital Brand's July 14, 2017

request for discovery pursuant to Rule of Practice 230 by attaching portions of the investigative file relevant to Digital Brand, as well as a Withheld Document List of categories of documents withheld based on stated privileges.

4. Attached hereto as Exhibit 3 is a true copy of an email sent to the Court and Digital Brand's counsel on July 7, 2017, attaching the six hearing witness subpoenas that the Division requested the Court to issue.

5. Attached hereto as Exhibit 4 is a true copy of a July 31, 2017 email from me to Melissa Collins of the Division of Enforcement's Central Processing Unit. The Central Processing Unit is responsible for sending out and receiving document productions for the Division, and my email asks Ms. Collins to send the hearing subpoena document production to Digital Brand's counsel. Also attached is a true copy of Ms. Collins' July 31, 2017 email confirmation that the documents were sent to an Accellion Secure File Sharing Manager drop box for Digital Brand's counsel to access the documents.

6. Attached hereto as Exhibit 5 is a true copy of Melissa Collins' October 3, 2017 email to me attaching a printout she obtained from the Commission's Office of Information Technology ("OIT"). The printout is from the Accellion Secure File Sharing Manager database showing that Digital Brand's counsel downloaded the file from the drop box on August 7, 2017.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on October 20, 2017.

  
\_\_\_\_\_  
Neil J. Welch, Jr.

**Division Declaration Ex. 1**



UNITED STATES  
**SECURITIES AND EXCHANGE COMMISSION**

Washington, D.C. 20549-6010

**DIVISION OF  
ENFORCEMENT**

May 17, 2017

BY PRIORITY MAIL EXPRESS

Digital Brand Media & Marketing Group, Inc.  
747 Third Ave.  
New York, NY 10017

Re: *In the Matter of Digital Brand Media & Marketing Group, Inc., et al.*

Dear Sir or Madam:

Pursuant to SEC Rule of Practice § 201.230, documents related to this matter are available for inspection and copying at the Securities and Exchange Commission's headquarters in Washington, D.C. Please note, however, that pursuant to SEC Rule of Practice § 201.230(f), a respondent in an SEC proceeding is responsible for bearing the cost of copying. If you wish to make arrangements for such inspection and copying, please call me at (202) 551-4731.

Sincerely,

A handwritten signature in cursive script that reads "Neil J. Welch, Jr.".

Neil J. Welch, Jr.  
Senior Investigations Counsel

Enclosures

**Division Declaration Ex. 2**

## **Welch, Neil (Chip)**

---

**From:** Welch, Neil (Chip)  
**Sent:** Monday, July 17, 2017 3:40 PM  
**To:** marshal@lawmsa.com  
**Cc:** ORourke, Kevin  
**Subject:** Digital Brand - Division's Discovery Response

Marshal, please find attached the Division's response to your discovery request.

Chip



DivDiscovery2Di...

**Welch, Neil (Chip)**

---

**From:** Microsoft Outlook  
**To:** marshal@lawmsa.com  
**Sent:** Monday, July 17, 2017 3:40 PM  
**Subject:** Relayed: Digital Brand - Division's Discovery Response

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

marshal@lawmsa.com (marshal@lawmsa.com) <mailto:marshal@lawmsa.com>

Subject: Digital Brand - Division's Discovery Response



UNITED STATES  
**SECURITIES AND EXCHANGE COMMISSION**  
Washington, D.C. 20549-6010

**DIVISION OF  
ENFORCEMENT**

July 17, 2017

BY EMAIL

Marshal Shichtman, Esq.  
Marshal Shichtman & Associates, P.C.  
1 Old Country Rd., Suite 360  
Carle Place, NY 11514  
[marshal@lawmsa.com](mailto:marshal@lawmsa.com)

Re: *In the Matter of Digital Brand Media & Marketing Group, Inc., et al.*

Dear Mr. Shichtman:

As you know, by letter dated May 17, 2017, the Division of Enforcement offered Respondent Digital Brand Media & Marketing Group, Inc. discovery pursuant to SEC Rule of Practice 230. Pursuant to your July 14, 2017 request and SEC Rule of Practice 230, I have attached those portions of the Division's investigative file relevant to Digital Brand Media & Marketing Group, Inc. I have also enclosed, pursuant to Rule 230(c), a list of categories of documents withheld.

If you have any questions, please call me at (202) 551-4731.

Sincerely,

A handwritten signature in black ink that reads "Neil J. Welch, Jr." in a cursive script.

Neil J. Welch, Jr.  
Senior Investigations Counsel

Enclosures

**Division of Enforcement's Withheld Document List**  
**for July 17, 2017 Production to Digital Brand Media & Marketing Group, Inc.**  
*In the Matter of Digital Brand Media & Marketing Group, Inc., et al.*  
**Admin. Proceeding File No. 3-17990**

	Document or Category	Date or Dates	Author or Authors	Basis for Withholding or Redaction
1	Action memoranda and draft action memoranda	Various	Neil J. Welch, Jr. and other Commission attorneys	Attorney Work Product; Attorney Client Communications; Deliberative Process Privilege; Internal Writing of Commission Employee
2	Internal SEC emails, notes, and memoranda	Various	Neil J. Welch, Jr. and/or other Commission attorneys	Attorney Work Product; Attorney Client Communications; Deliberative Process Privilege; Internal Writing of Commission Employee
3	Phone logs	Various	Neil J. Welch, Jr. and/or other Commission attorneys	Attorney Work Product; Attorney Client Communications; Internal Writing of Commission Employee
4	Internal SEC spreadsheets and databases	Various	D. Frye and/or other Commission attorneys	Attorney Work Product; Internal Writing of Commission Employee



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

DIVISION OF  
CORPORATION FINANCE

November 15, 2013

Via Email to

Ms. Linda Perry  
Executive Director  
Digital Brand Media & Marketing Group, Inc.  
747 Third Avenue  
New York, NY 10017

Dear Ms. Perry:

We note that your August 31, 2012 financial statements were audited by Sherb & Co., LLP. On November 7, 2013, the Securities and Exchange Commission ("SEC") denied Sherb & Co., LLP the privilege of appearing or practicing before the Commission as an accountant. You can find a copy of the order at <http://www.sec.gov/litigation/admin/2013/34-70823.pdf>

As Sherb & Co., LLP is barred from practicing before the SEC, you may not include its audit report in your filings with the Commission on or after November 7, 2013. If Sherb & Co., LLP audited a year that you are required to include in your filings with the Commission, you should have a firm that is registered with the PCAOB re-audit that year.

Please advise us as to how you intend to address this matter by no later than November 29, 2013. If you have any questions, you can reach me at 202-551-3849.

Sincerely,

/s/ Jennifer Thompson for

James Allegretto  
Senior Assistant Chief Accountant



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

December 2, 2013

Via U.S. Mail and Facsimile to 646 722 2501

Linda Perry  
Executive Director  
Digital Brand Media & Marketing Group, Inc.  
747 Third Avenue  
New York, NY 10017

Re: Digital Brand Media & Marketing Group, Inc.  
File No.: 000-52838

Dear Ms. Perry:

In your letter dated November 29, 2013, you requested that the staff waive the requirement and exempt the company from a re-audit of its 2012 financial statements in its 2013 Form 10-K. The company's 2012 financial statements were audited by Sherb & Co., LLP ("Sherb").

We are unable to grant the company's request. As previously stated in a letter dated November 15, 2013, the SEC denied Sherb the privilege of appearing or practicing before the Commission as an accountant. The company should not include Sherb's audit report in any filings made on or after November 7, 2013. The company should have a firm that is permitted to practice before the Commission as an accountant and is registered with the PCAOB re-audit the 2012 financial statements included in its 2013 10-K.

The staff's conclusion is based solely on the information provided in your letter. Different or additional material facts could result in a different conclusion. If you have any questions, I can be reached at 202-551-3511.

Sincerely,

Louise M. Dorsey  
Associate Chief Accountant



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

February 27, 2017

CERTIFIED MAIL  
TRACKING # 7013 2630 0002 2660 1267  
RETURN RECEIPT REQUESTED

Linda Perry, Executive Director  
Digital Brand Media & Marketing Group, Inc.  
747 Third Avenue  
New York, NY 10017

Re: Digital Brand Media & Marketing Group, Inc.  
File No. 0-52838

Dear Ms. Perry:

We are writing to address the reporting responsibilities under the Securities Exchange Act of 1934 of the referenced company. For ease of discussion in this letter, we will refer to the referenced company as the "Registrant."

It appears that the Registrant is not in compliance with its reporting requirements under Section 13(a) of the Securities Exchange Act of 1934. If the Registrant is in compliance with its reporting requirements, please contact us (through the contact person specified below) within fifteen days from the date of this letter so we can discuss the reasons why our records do not indicate that compliance. If the Registrant is not in compliance with its reporting requirements, it should file all required reports within fifteen days from the date of this letter.

If the Registrant has not filed all required reports within fifteen days from the date of this letter, please be aware that the Registrant may be subject, without further notice, to an administrative proceeding to revoke its registration under the Securities Exchange Act of 1934. This administrative proceeding would be brought by the Commission's Division of Enforcement pursuant to Section 12(j) of the Securities Exchange Act of 1934. If the Registrant's stock is trading, it also may be subject to a trading suspension by the Commission pursuant to Section 12(k) of the Securities Exchange Act of 1934.

Finally, please consider whether the Registrant is eligible to terminate its registration under the Securities Exchange Act of 1934. If the Registrant is eligible to terminate its registration, it would do so by filing a Form 15 with the Commission. While the filing of a Form 15 may cease the Registrant's on-going requirement to file periodic and current reports, it would not remove the Registrant's obligation to file all reports required under Section 13(a) of the Securities Exchange Act of 1934 that were due on or before the date the Registrant filed its Form 15. Again, if the Registrant is eligible to terminate its registration under the Securities Exchange Act of 1934, please note that the filing of a Form 15 would not remove the Registrant's requirement to file delinquent Securities Exchange Act of 1934 reports – the Registrant would still be required to file with the Commission all periodic reports due on or before the date on which the Registrant filed a Form 15.

If you should have a particular question in regard to this letter, please contact the undersigned at (202) 551-3245 or by fax at (202) 772-9207.

Sincerely,

A handwritten signature in black ink, appearing to read "MDS" with a stylized flourish above it.

Marva D. Simpson  
Special Counsel  
Office of Enforcement Liaison  
Division of Corporation Finance

**Division Declaration Ex. 3**

## Welch, Neil (Chip)

---

**From:** Welch, Neil (Chip)  
**Sent:** Friday, July 07, 2017 2:50 PM  
**To:** Abel, Bradley; Shields, Kathy Moore  
**Cc:** ALJ; ORourke, Kevin; marshal@lawmsa.com  
**Subject:** Digital Brand, 3-17990 - Division's Subpoenas for Witnesses attached



BoisseauSubpoe...



Boisseau  
Subpoena Attac...



GraySubpoena.d...



Gray Subpoena  
Attachment.docx



JamesSubpoena...



James Subpoena  
Attachment.doc...



NaparstekSubpo...



Naparstek  
Subpoena Attac...



PerrySubpoena....



Perry Subpoena  
Attachment.doc...



PruzanskySubpo...



Pruzansky  
Subpoena Attac...

**Welch, Neil (Chip)**

---

**From:** Microsoft Outlook  
**To:** marshal@lawmsa.com  
**Sent:** Friday, July 07, 2017 2:50 PM  
**Subject:** Relayed: Digital Brand, 3-17990 - Division's Subpoenas for Witnesses attached

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

marshal@lawmsa.com (marshal@lawmsa.com) <mailto:marshal@lawmsa.com>

Subject: Digital Brand, 3-17990 - Division's Subpoenas for Witnesses attached

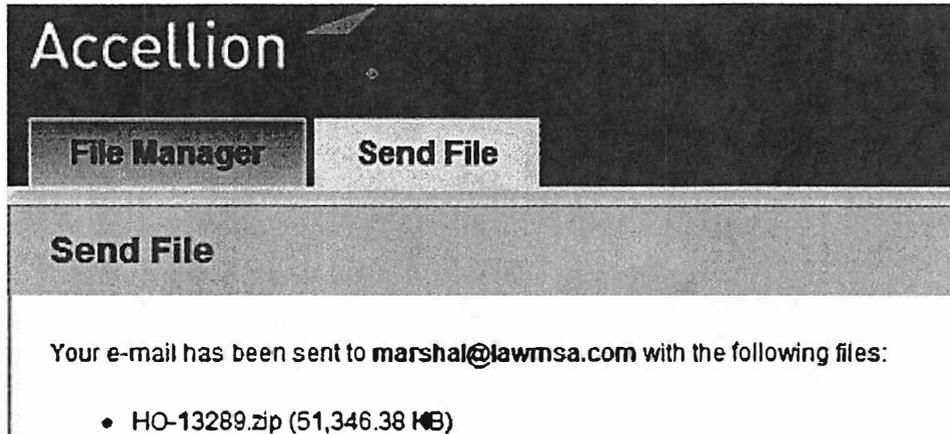
**Division Declaration Ex. 4**

## Welch, Neil (Chip)

---

**From:** Collins, Melissa I.  
**Sent:** Monday, July 31, 2017 3:54 PM  
**To:** Welch, Neil (Chip)  
**Cc:** ORourke, Kevin; Basse, Uwem (Contractor)  
**Subject:** RE: Digital Brand

All set.



---

**From:** Welch, Neil (Chip)  
**Sent:** Monday, July 31, 2017 3:48 PM  
**To:** Collins, Melissa I.  
**Cc:** ORourke, Kevin; Basse, Uwem (Contractor)  
**Subject:** Digital Brand

Melissa please send these documents to Marshal Shichtman, email address [marshal@lawmsa.com](mailto:marshal@lawmsa.com), with this message:

“Marshal, with this production of documents, you have all of the documents that we received pursuant to the issued hearing subpoenas.

We are still awaiting subpoenaed documents from your clients.

Please advise when we will receive them.

Thank you.

Chip Welch”

The files are here:

J:\HO-13001 to HO-13500\HO-13289\LITIGATION FILES\Digital Brand\Subpoenaed Productions

## Welch, Neil (Chip)

---

**From:** Collins, Melissa I.  
**Sent:** Monday, July 31, 2017 3:52 PM  
**To:** marshal@lawmsa.com  
**Subject:** SEC Matter HO-13289

**You have received 1 secure file from [CollinsMe@sec.gov](mailto:CollinsMe@sec.gov).**

Use the secure link below to download.

---

Marshal, with this production of documents, you have all of the documents that we received pursuant to the issued hearing subpoenas.

We are still awaiting subpoenaed documents from your clients.

Please advise when we will receive them.

Thank you.

Chip Welch

### **Secure File Downloads:**

Available until: 30 August 2017

Click link to download:

**[HO-13289.zip](#)**

50.14 MB, Fingerprint: 84ea233059a5e2a004280444a1702fef ([What is this?](#))

You have received attachment link(s) within this email sent via SEC's Secure File Transfer. To retrieve the attachment(s), please click on the link(s).

Secured by [Accellion](#)

**Division Declaration Ex. 5**

## Welch, Neil (Chip)

---

**From:** Collins, Melissa I.  
**Sent:** Tuesday, October 03, 2017 12:20 PM  
**To:** Welch, Neil (Chip)  
**Subject:** HO-13289 Marshal Shichtman  
**Attachments:** RE: Digital Brand; SEC Matter HO-13289

Hi Chip. Attached are the emails showing that I sent the docs to Mr. Shichtman. I do not personally have a receipt that he downloaded the docs but did reach out to Charles Famoso in OIT and he provided the below report.

The log entry shows that Mr. Shichtman downloaded the zip file provided to him on 08/07/17. Hope this helps.



## Securities and Exchange Commission (SEC) Secure File Sharing Manager

### Menu

- Home
- Appliance
- Settings
- Administration
- Manage
- Appearance
- Reports
  - Send Activity
  - Receive Activity
  - Users
  - Workspaces
  - Traffic Activity
  - Traffic Summary
  - Resource Usage
  - Usage Summary
  - Log
- Logout

### Log

Search:  Search Option:  ▾  
 From:  ▾  ▾  ▾  ▾  ▾  ▾  
 Download as  ▾

Page 1 of 1 (Total: 3 entries)

<input checked="" type="checkbox"/> Date GMT-05:00	IP Address	Username	
2017-08-07 09:39:28	47.23.5.66	marshal@lawmsa.com	Downloaded file: HO-13289.:
2017-07-31 15:52:09	172.26.248.179	CollinsMe@sec.gov	[Web] Sent e-mail - Subject
2017-07-31 15:52:07	172.26.248.179	CollinsMe@sec.gov	[Web] Attached files: HO-13:

Page 1 of 1 (Total: 3 entries)

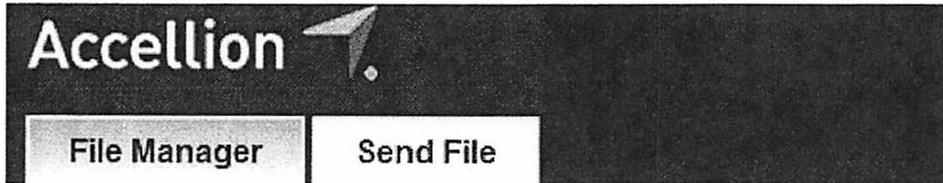
Thanks,  
Melissa

**Welch, Neil (Chip)**

---

**From:** Collins, Melissa I.  
**Sent:** Monday, July 31, 2017 3:54 PM  
**To:** Welch, Neil (Chip)  
**Cc:** ORourke, Kevin; Basse, Uwem (Contractor)  
**Subject:** RE: Digital Brand

All set.



**Send File**

Your e-mail has been sent to [marshal@lawmsa.com](mailto:marshal@lawmsa.com) with the following files:

- HO-13289.zip (51,345.38 KB)

---

**From:** Welch, Neil (Chip)  
**Sent:** Monday, July 31, 2017 3:48 PM  
**To:** Collins, Melissa I.  
**Cc:** ORourke, Kevin; Basse, Uwem (Contractor)  
**Subject:** Digital Brand

Melissa please send these documents to Marshal Shichtman, email address [marshal@lawmsa.com](mailto:marshal@lawmsa.com), with this message:

“Marshal, with this production of documents, you have all of the documents that we received pursuant to the issued hearing subpoenas.

We are still awaiting subpoenaed documents from your clients.

Please advise when we will receive them.

Thank you.

Chip Welch”

The files are here:

J:\HO-13001 to HO-13500\HO-13289\LITIGATION FILES\Digital Brand\Subpoenaed Productions

**Welch, Neil (Chip)**

---

**From:** Collins, Melissa I.  
**Sent:** Monday, July 31, 2017 3:52 PM  
**To:** marshal@lawmsa.com  
**Subject:** SEC Matter HO-13289

**You have received 1 secure file from [CollinsMe@sec.gov](mailto:CollinsMe@sec.gov).**  
Use the secure link below to download.

---

Marshal, with this production of documents, you have all of the documents that we received pursuant to the issued hearing subpoenas.

We are still awaiting subpoenaed documents from your clients.

Please advise when we will receive them.

Thank you.

Chip Welch

**Secure File Downloads:**  
Available until: 30 August 2017

Click link to download:

**[HO-13289.zip](#)**

50.14 MB, Fingerprint: 84ea233059a5e2a004280444a1702fef ([What is this?](#))

You have received attachment link(s) within this email sent via SEC's Secure File Transfer. To retrieve the attachment(s), please click on the link(s).

Secured by [Accellion](#)