UNITED STATES OF AMERICA Before the SECURITIES AND EXCHANGE COMMISSION



:

ADMINISTRATIVE PROCEEDING File No. 3-18405

In the Matter of

New Global Energy, Inc.

NEW GLOBAL ENERGY, INC.'S RESPONSE TO ORDER TO SHOW CAUSE

Respondent.

Respondent, New Global Energy, Inc., through undersigned counsel, hereby responds to the Securities and Exchange Commission's (the "Commission") April 3, 2018, Order to Show Cause, and says:

1.e Upon learning of the order instituting proceedings ("OIP"), undersigned counsele confirmed the date when New Global Energy, Inc. ("NGE") was served (March 20, 2018) and thereafter conferred with the Commission's counsel as to the correct response date to the OIP. A true and correct copy of the correspondence between the undersigned and the Commission's counsel is attached hereto as Exhibit "A".

2.e Undersigned counsel believed, based on conferring and agreement with thee Commission's counsel that the answer to the OIP was due twenty (20) days after service. Clearly this was an inadvertent mistake on counsel's part and one for which NGE should not suffer.

3.e Irrespective of the foregoing, NGE will be filing its answer to the OIP on ore before April 9, 2018, *i.e.*, before the response to the April 3, 2018 Order to Show Cause is due.

4.e Undersigned counsel apologizes to the Commission, as he was unaware that ae motion for extension of time was required here. To the extent that one is required, please

RENNERT VOGEL MANDLER & RODRIGUEZ, P.A., ATTORNEYS AT LAW, 29TH FLOOR, MIAMI TOWER 100 S.E. 2ND STREET, MIAMI, FLORIDA 33131-2130 • TEL. (305) 577-4177 • FAX (305) 873-6036 consider this response to serve as a nunc pro tunc motion for an additional ten (10) days to respond to OPI, *i.e.*, up to and including April 9, 2018.

WHEREFORE, NGE requests entry of an order that NGE has shown good cause in response to the Order to Show Cause, NGE's registration should not be revoked at this time, and, to the extent required, NGE be granted an additional ten (10) days to respond to the OIP, *i.e.*, up to and including April 9, 2018.

Dated: April 3, 2018.

Respectfully submitted,

RENNERT VOGEL MANDLER & RODRIGUEZ, P.A.

Counsel for Respondent, New Global Energy, Inc. Miami Tower 100 S.E. Second Street, Suite 2900 Miami, Florida 33131 Telephone: (305) 577-4177 Facsimile: (305) 533-8519

Jeffrey Tew Florida Bar No. 121291 <u>itew@rvmrlaw.com</u> Robert M. Stein Florida Bar No. 093936 <u>rstein@rvmrlaw.com</u>

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 3, 2018, a true and correct copy of the above and

foregoing was sent to the persons and parties listed below entitled to notice:

Via U.S. Postal Service first class mail and e-mail:

Leslie J. Hughes, Esq. Division of Enforcement Securities and Exchange Commission 1961 Stout Street, Suite 1700 Denver, CO 80294-1961 E-mail: <u>HughesLJ@sec.gov</u>

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The Honorable Cameron Elliot Administrative Law Judge Securities and Exchange Commission 100 F Street, N.S. Washington, D.C. 20549 E-mail: <u>alj@sec.gov</u>

Via U.S. Postal Service first class mail (original and 3 copies), and facsimile:

Brent J. Fields, Secretary Office of the Secretary Securities and Exchange Commission 100 F Street, N.E. Mail Stop 9010 Washington, D.C. 20549 (Facsimile: 202-772-9324)

Jeffrey A. Tew, Esq. By_

RENNERT VOGEL MANDLER & RODRIGUEZ, P.A., ATTORNEYS AT LAW, 2914 FLOOR, MIAMI TOWER 100 S.E. 2ND STREET, MIAMI, FLORIDA 33131-2130 • TEL. (305) 577-4177 • FAX (305) 373-6036

Tew, Jeffrey

From:	Tew, Jeffrey
Sent:	Tuesday, March 27, 2018 2:02 PM
То:	'Hughes, Leslie J.'
Cc:	Juarez, Dianelys
Subject:	RE: New Global AP - service of answer.
SentFromSession:	TEW-JEFF.jtew.3/27/2018 12:06:00 PM

Leslie: our client advises service was on 3/20 so we'll file our answer 20 days from that date – please advise if you think another date is required. Jeff

Jeffrey Tew Esq. | vCerd RENNERT VOGEL MANDLER & RODRIGUEZ, P.A. ATTORNEYS AT LAW 100 SE 2nd Street, 29th Floor | Miami, FL 33131 305-423-3405 Direct | 305-533-8501 Fax | itew@RVMRLAW.COM

DISCLAIMER

From: Tew, Jeffrey Sent: Tuesday, March 27, 2018 12:17 PM To: 'Hughes, Leslie J.' <HughesLJ@SEC.GOV> Cc: Juarez, Dianelys <djuarez@rvmrlaw.com> Subject: RE: New Global AP - service of answer.

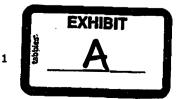
Hi Leslie: have you confirmed the date the company's registered agent was served? Jeff



DISCLAIMER

From: Hughes, Leslie J. <<u>HughesLJ@SEC.GOV></u> Sent: Friday, March 23, 2018 1:36 PM To: Tew, Jeffrey <<u>itew@RVMRLAW.COM></u> Subject: RE: New Global AP - service of answer.

Jeff,



→e Under the Commission's Rules of Practice, 17 CFR 201.220, the answer is due 20 days after service. I have reached out to the Secretary's Office to confirm the date that the Company's registered agent was served.
Leslie

Leslie J. Hughes Trial Counsel Securities and Exchange Commission 1961 Stout Street, Floor 1700 Denver, CO 80294-1961 (303)&44-1086 (303)&97-3529 faxe

From: Tew, Jeffrey [<u>mailto:itew@RVMRLAW.COM</u>] Sent: Friday, March 23, 2018 11:26 AM To: Hughes, Leslie J.; Stein, Robert M. Cc: Juarez, Dlanelys Subject: New Global AP - service of answer. postponed

Leslie: am I correct that our 10 days to answer is from the date the certified mail was served? We'll save the depo dates. Jeff

Jeffrey Tew Esq. | <u>vCard</u>e RENNERT VOGEL MANDLER & RODRIGUEZ, P.A. ATTORNEYS AT LAW 100 SE 2nd Street, 29th Floor | Miami, FL 33131 305-423-3405 Direct | 305-533-8501 Fax | itew@RVMRLAW.COM Miami Boca Raton DISCLAIMER

From: Hughes, Leslie J. <<u>HughesLJ@SEC.GOV></u> Sent: Thursday, March 22, 2018 5:28 PM To: Tew, Jeffrey <<u>itew@RVMRLAW.COM></u>; Stein, Robert <u>M. <rstein@rvmrlaw.com></u> Subject: Call on New Global postponed

Jeff and Bob,

I received Jeff's message requesting that we reset our call planned for tomorrow. That is fine. I am out of the office all of next week, but available the following week for a call on April 2 at 1:00 pm EDT or you can propose a different time or date that works for you.

On the topic of depositions, I have been contacting witnesses and have tentative dates for two depositions of a representative of Island Stock Transfer on May 8 in Clearwater or Tampa Florida, and possibly Mike Cronin on May 9 or 10 in Winter Springs Florida, outside of Orlando. Please hold those three dates. I will need to work on travel arrangements and can confirm those dates during the week of April 2 and then send the deposition notices. I am working to set two depositions the week of May 14 in Colorado for a representative of Manhattan Transfer and possibly John Knight.

On the administrative proceedings against New Global, the Order Instituting Proceedings was sent by certified mail on March 16, to the registered agent in Wyoming. I have not yet received confirmation that it was served. I received an Order from Administrative Law Judge Elliott today setting a telephonic prehearing conference for May 15, 2018 at 2:00 pm Eastern. I will make arrangements the telephone conference.

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Let me know what works best for our follow up call.

Leslie J. Hughes Trial Counsel Securities and Exchange Commission 1961 Stout Street, Floor 1700 Denver, CO 80294-1961 (303) 844-1086 (303) 297-3529 fax