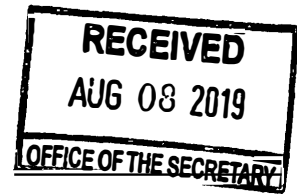


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING
File Number 3-18764

In the Matter of

MEDPRO SAFETY PRODUCTS, INC.,

Respondent.

:
: DIVISION OF
: ENFORCEMENT'S MOTION
: AND MEMORANDUM OF
: LAW FOR DEFAULT
: JUDGMENT AND
: IMPOSITION OF REMEDIAL
: SANCTIONS
:

Comes Now the Division of Enforcement ("Division") of the U.S. Securities and Exchange Commission ("Commission" or "SEC"), by and through undersigned counsel, and hereby files this Motion and Memorandum of Law for a Default Judgment and Imposition of Remedial Sanctions against Respondent MedPro Safety Products, Inc. ("MedPro"), for the reasons set forth below.

I. MOTION

On September 13, 2018, the Commission instituted an Order Instituting Proceedings ("OIP") against MedPro, and, on September 15, 2018, served it with the OIP. *See* Schroeder Decl., ¶¶ 5, 6. On September 20, 2018, MedPro filed an Answer to the OIP. *Id.*, ¶ 7.

On October 29, 2018, MedPro filed an Exchange Act Form 8-K/A ("Form 8-K/A") with the Commission, in which it announced the resignation of its sole remaining officer and director. *Id.*, ¶ 8. On April 8, 2019, MedPro withdrew its Answer to the OIP.¹ *Id.*, ¶ 10. The Division now moves for a default judgment against MedPro and the revocation of its securities registrations.

¹ In its "Withdrawal of Response," MedPro stated the following: "MedPro no longer has any operations or management."

II. STATEMENT OF FACTS²

Following the filing of its Form 8-K/A, MedPro advised the Division that it would no longer contest the proceeding against it or oppose the Division's revocation of its registrations of securities with the Commission. However, MedPro declined to enter into a settlement agreement with the Division and opted, instead, to require the Division to obtain a default judgement against it. MedPro did, however, agree to withdraw its previously-filed Answer to the OIP, and, on April 8, 2019, did so. *Id.*, ¶¶ 9, 10.

MedPro failed to file six Exchange Act Forms 10-K ("Forms 10-K"), for the periods ending December 31, 2013 (due on March 31, 2014, or 64-months late), December 31, 2014 (due on March 31, 2015, or 52-months late), December 31, 2015 (due on March 30, 2016, or 40-months late), December 31, 2016 (due on March 31, 2017, or 28-months late), December 31, 2017 (due on April 2, 2018, or 15-months late) and March 31, 2018 (due on April 1, 2019, or 3-months late). MedPro also failed to file a Notification of Late Filing on Exchange Act Forms 12b-25 ("Forms 12b-25") for each one of its delinquent Forms 10-K. *Id.*, ¶¶ 11, 12, 16, 20, 24, 28, 32.

In addition, MedPro failed to file 16 Exchange Act Forms 10-Q ("Forms 10-Q"), for the periods ending March 31, 2014 (due on May 15, 2014, or 62-months late), June 30, 2014 (due on August 14, 2014, or 59-months late), September 30, 2014 (due on November 14, 2014, or 56-months late), March 31, 2015 (due on May 15, 2015, or 50-months late), June 30, 2015 (due on August 14, 2015, or 47-months late), September 30, 2015 (due on November 16, 2015, or 44-months late), March 31, 2016 (due on May 16, 2015, or 38-months late), June 30, 2016 (due on August 15, 2016, or 35-months late), September 30, 2016 (due on November 14, 2016, or 32-

² The Division requests, pursuant to Commission Rule of Practice 323, that the Commission take official notice of all information and filings on EDGAR referred to in this brief and/or filed as exhibits.

months late), March 31, 2017 (due on May 15, 2017, or 26-months late), June 30, 2017 (due on August 14, 2017, or 23-months late), September 30, 2017 (due on November 14, 2017, or 20-months late), March 31, 2018 (due on May 15, 2018, or 14-months late), June 30, 2018 (due on August 14, 2018, or 11-months late), September 30, 2018 (due on November 14, 2018, or 8-months late) and March 31, 2019 (due on May 15, 2019, or 2-months late). Likewise, MedPro failed to file Forms 12b-25 for its delinquent Forms 10-Q. *Id.*, ¶¶ 11, 13-15, 17-19, 21-23, 25-27, 29-31, 33.

III. MEMORANDUM OF LAW

A. Since MedPro Withdrew its Answer After Being Served, It Is In Default

Rule 155(a) of the Commission's Rules of Practice states that:

A party to a proceeding may be deemed to be in default and the Commission or the hearing officer may determine the proceeding against the party upon consideration of the record, including the order instituting proceedings, the allegations of which may be deemed to be true, if that party fails: ...

- (2) To answer, to respond to a dispositive motion within the time provided, or otherwise to defend the proceeding

Since MedPro has withdrawn its Answer to the OIP, it is no longer defending this proceeding. As such, it should be found to be in default.

B. The Facts Alleged In The OIP Must Be Deemed True

As stated in the OIP, failure to file a directed answer may result in MedPro being deemed in default and the proceedings may be determined against it upon consideration of the OIP, the allegations of which may be deemed to be true. *See* OIP (¶ IV) (*citing* Rules 155(a), 220(f), and 310). In light of MedPro's withdrawal of its Answer to the OIP, the facts which may be deemed true include the following:

MedPro (CIK No. 1364896) is a revoked Nevada corporation located in Lexington, Kentucky, with a class of securities registered with the Commission pursuant to Exchange Act

Section 12(g). *Id.*, ¶ II.A.1.

MedPro is delinquent in its periodic filings with the Commission, having not filed any periodic reports since it filed a form 10-Q for the period ending September 30, 2013, which reported a net loss of \$755,393 for the prior three months. *Id.*

MedPro has repeatedly failed to meet its obligations to file timely periodic reports, and failed to heed a delinquency letter sent to it by the Division of Corporation Finance, requesting MedPro's compliance with its periodic filing obligations. *Id.*, ¶ II.B.5.

MedPro has failed to comply with the following Section and Rules of the Exchange Act: (1) Section 13(a) and the rules promulgated thereunder, which requires MedPro, as an issuer of securities pursuant to Exchange Act Section 12, to file with the Commission current and accurate information in periodic reports; (2) Rule 13a-1, which requires MedPro to file annual reports; and, (3) Rule 13a-13, which requires MedPro to file quarterly reports. *Id.*, ¶ II.B.6.

As the allegations may be deemed true because MedPro is in default, the remaining issue is whether it is necessary and appropriate for the protection of investors to suspend, for a period not exceeding twelve months, or revoke, the registration of each class of securities registered pursuant to Section 12 of the Exchange Act. *Id.*, ¶ III.B.

C. Revocation Is The Appropriate Sanction That Should Be Imposed For MedPro's Serial Violations Of Exchange Act Sections 13(a) And Rules 13a-1 And 13a-13 Thereunder

Exchange Act Section 12(j) provides that the Commission may revoke or suspend the Exchange Act Section 12 registration of an issuer's securities where it is "necessary or appropriate for the protection of investors." The Commission's determination of the appropriate sanction "turns on the effect on the investing public, including both current and prospective investors, of the issuer's violations, on the one hand, and Section 12(j) sanctions on the other hand." *Gateway International Holdings, Inc.*, Exchange Act Rel. No. 53907, 2006 SEC LEXIS 1288, at *19-20

(May 31, 2006) (“*Gateway*”). In making this determination, the Commission has said it will consider, among other things, the following factors: (1) the seriousness of the issuer’s violations; (2) the isolated or recurrent nature of the violations; (3) the degree of culpability involved; (4) the extent of the issuer’s efforts to remedy its past violations and ensure future compliance; and, (5) the credibility of the issuer’s assurances, if any, against future violations. *Id.*, see also *Steadman v. SEC*, 603 F.2d 1126, 1140 (5th Cir. 1979) (setting forth the public interest factors that informed the Commission’s *Gateway* decision). Although no one factor is controlling, in *Stansbury Holdings Corp.*, Initial Decision Rel. No. 232, 2003 SEC LEXIS 1639, at *14-15 (July 14, 2003), and *WSF Corp.*, Initial Decision rel. No. 204, 2002 SEC LEXIS 1242, at *5, *18, 14 (May 8, 2002), the Commission reaffirmed that “recurrent failure to file periodic reports” is ‘so serious that only a compelling showing with respect to other factors would justify a lesser sanction than revocation.’” *Absolute Potential, Inc. (f/k/a Absolute Waste Services, Inc.)*, Exchange Act Rel. No. 71866, 2014 SEC LEXIS, at *24 (April 4, 2014) (quoting *Impax Laboratories, Inc.*, Securities Exchange Act of 1934 Rel. No. 57864, 2008 SEC LEXIS 1197, at *27 (May 23, 2008)).

1. MEDPRO’S VIOLATIONS OF SECTION 13(a) ARE SERIOUS AND EGREGIOUS

MedPro’s violative conduct is serious and egregious. MedPro has failed to timely file a total of six Forms 10-K and 16 Forms 10-Q. See Schroeder Decl., ¶ 11. Given the central importance of the reporting requirements imposed by Section 13(a) and the rules thereunder, Administrative Law Judges have found delinquencies of a far lesser number and duration to warrant revocation.³

³ *iBIZ Technology Corp.*, Initial Decision Rel. No. 312 at 1 (June 16, 2006) (revocation granted due to the delinquency of one form 10-K and three forms 10-Q); *WSF Corp.*, 2002 SEC LEXIS 1242, at *14 (May 8, 2002) (revocation granted due to the delinquency of one Form 10-K and three Forms 10-Q); *Freedom Golf Corp.*, Initial Decision Release No. 227, 2003 SEC LEXIS 1178,

2. MEDPRO'S VIOLATIONS OF SECTION 13(a) HAVE BEEN RECURRENT FOR MANY YEARS

MedPro's violations of its periodic reporting obligations have been continuous and ongoing, for over five years. Furthermore, MedPro never filed a Form 12b-25 seeking an extension of time to file any of its delinquent Forms 10-K and 10-Q. *Id.*, ¶ 11. *See Investco, Inc.*, Initial Decision Rel. No. 240, 2003 SEC LEXIS 2792, at *6 (November 24, 2003) (delinquent issuer's actions were found to be egregious and recurrent where there was no evidence that any extensions to make the filings were sought).

3. MEDPRO HAS EVIDENCED A HIGH DEGREE OF CULPABILITY⁴

In *Gateway*, the Commission stated that, in determining the appropriate sanction in connection with an Exchange Act Section 12(j) proceeding, one of the factors it will consider is "the degree of culpability involved." The Commission found that the delinquent issuer in *Gateway* "evidenced a high degree of culpability" because it "knew of its reporting obligations, yet failed to file" twenty periodic reports and only filed two Forms 12b-25. *Gateway*, 2006 SEC LEXIS

at *5 (May 15, 2003) (revocation granted due to the delinquency of one Form 10-K and one Form 10-Q).

⁴ Although the OIP does not allege MedPro's delinquent Forms 10-Q due on November 14, 2018, and May 15, 2019, and its delinquent Form 10-K due on April 1, 2019, the Commission may consider them in determining an appropriate sanction. The Commission has applied the same principle in other contexts. *See Robert Bruce Lohmann*, 80 SEC Docket 1790, 2003 SEC LEXIS 1521, at *17 n.20 (June 26, 2003) (ALJ may properly consider lies told to staff during investigation in assessing sanctions, even though they were not charged in the OIP); *Stephen Stout*, 73 SEC Docket 1441, 2000 SEC LEXIS 2119, at *57 & n.64 (October 4, 2000) (respondent's subsequent conduct in creation of arbitration scheme, which was not charged in the OIP, was found to be relevant in determining whether bar was appropriate); *Joseph P. Barbato*, Securities Exchange Act of 1934 Rel. No. 41034, 1999 SEC LEXIS 276, at *49-50 (February 10, 1999) (respondent's conduct in contacting former customers identified as Division witnesses was found to be indicative of respondent's potential for committing future violations). *See also SEC v. Falstaff Brewing Corp.*, 629 F.2d 62, 78 (D.C. Cir. 1980) (district court properly considered defendant's conduct in continuing to solicit proxies after it was advised of deficiencies by the Commission in evaluating likelihood of future violations).

1288, at *21.

In this case, MedPro knew of its reporting obligations and nevertheless failed to file 22 periodic reports since it last filed a Form 10-Q for the period ending September 30, 2013. It also failed to file any Forms 12b-25 for its missing periodic reports. *Id.*, ¶ 11. Consequently, the Commission and investors were left in the dark; they did not know why MedPro was unable to make its periodic filings, and when it would file them. *Calais Resources, Inc.*, 2012 SEC LEXIS 2023 at *16-17 (June 29, 2012) (noting failures to file Forms 12b-25 as supporting revocation order).

MedPro has demonstrated a highly-troubling attitude towards the Commission's reporting requirements. Compliance with them is mandatory, and is not subject to MedPro's whims. MedPro's behavior demonstrates an utter disregard for the significant public policy considerations those requirements are intended to address. MedPro's repeated failures to comply with its reporting obligations over a five-year period deprived the investing public with material, timely and accurate information about MedPro's operations and financial condition. MedPro has demonstrated more than sufficient culpability to warrant the Division's requested sanction of revocation.

4. MEDPRO HAS MADE NO EFFORTS TO REMEDY PAST VIOLATIONS AND ENSURE FUTURE COMPLIANCE

MedPro has made no efforts whatsoever to remedy past violations and ensure future compliance. As such, MedPro has amply demonstrated that it is incapable of meeting its obligations as an Exchange Act Section 12 registrant.

5. MEDPRO HAS OFFERED NO ASSURANCES AGAINST FUTURE VIOLATIONS

MedPro has offered no assurances whatsoever against future violations. The likelihood of future violations can be inferred from a single past violation, including the very violation that led

to the enforcement action. *See KPMG Peat Marwick LLP*, Securities Exchange Act of 1934 Rel. No. 44050, 2001 SEC LEXIS 422, at *21-22 (March 8, 2001) (some risk of future violation “need not be very great to warrant issuing a cease-and-desist order and [] in the ordinary course absent evidence to the contrary, a finding of past violations raises a sufficient risk of future violation”).

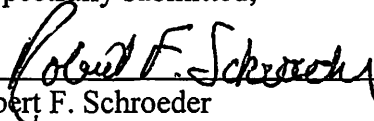
MedPro has failed to file 6 Forms 10-K, 16 Forms 10-Q, and any Forms 12b-25 for them. *Id.*, ¶ 11. It is a serial violator of its filing requirements with the Commission. It has offered nothing to suggest otherwise.

IV. CONCLUSION

MedPro has demonstrated a persistent disregard for its reporting requirements with the Commission, and an indifference to the important role those requirements play in keeping the public fully informed about its current and future business prospects. MedPro’s filing history and casual attitude strongly suggest the likelihood of continuing or future violations. For the reasons set forth herein, the Division requests that the Commission grant its Motion and Memorandum of Law for Default Judgment and Imposition of Remedial Sanctions Against MedPro, and revoke the registrations of each class of MedPro’s Section 12 registered securities.

Dated: August 7, 2019

Respectfully submitted,


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Counsel for the Division of Enforcement

CERTIFICATE OF SERVICE

I certify that on August 7, 2019, I caused the foregoing **DIVISION OF ENFORCEMENT'S MOTION AND MEMORANDUM OF LAW FOR DEFAULT JUDGMENT AND IMPOSITION OF REMEDIAL SANCTIONS AGAINST RESPONDENT MEDPRO SAFETY PRODUCTS, INC.**, to be served on the following persons by the method of delivery indicated below:

By E-Mail, Facsimile and UPS Next Day Air:

Vanessa A. Countryman
Acting Secretary
U.S. Securities and Exchange Commission
100 F Street N.E.
Washington, DC 20549-1090
apfilings@sec.gov
administrativeproceedingsfax@sec.gov

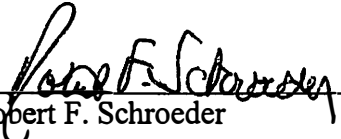
By UPS Next Day Air:

MedPro Safety Products, Inc.
817 Winchester Road, Suite 200
Lexington, KY 40505

By E-Mail and UPS Next Day Air:

Will Hart, Esq.
Hart & Hart, LLC
1624 Washington St.
Denver, CO 80203 Plaza
harttrinen@aol.com

Counsel for MedPro Safety Products, Inc.



Robert F. Schroeder

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File Number 3-18764

| | | |
|--------------------------------------|---|-------------------------------|
| In the Matter of | : | DIVISION OF |
| MEDPRO SAFETY PRODUCTS, INC., | : | ENFORCEMENT'S MOTION |
| Respondent. | : | AND MEMORANDUM OF |
| | : | LAW FOR DEFAULT |
| | : | JUDGMENT AND |
| | : | IMPOSITION OF REMEDIAL |
| | : | SANCTIONS |

DECLARATION OF ROBERT F. SCHROEDER

1. My name is Robert F. Schroeder. I am over the age of eighteen years of age and have personal knowledge of the facts set forth herein.

2. I am a Senior Trial Counsel with the Division of Enforcement ("Division") of the U.S. Securities and Exchange Commission ("Commission" or "SEC"), and co-counsel for the Division in the above-captioned proceedings.

3. I make this Declaration in support of the Division's Motion and Memorandum of Law for a Default Judgment and Imposition of Remedial Sanctions against Respondent MedPro Safety Products, Inc. ("MedPro").

4. I am familiar with the Division's files in this matter and the filings made by MedPro (CIK No. 1364896) in the Commission's EDGAR database.

5. On September 13, 2018, the Commission instituted an OIP against MedPro.

6. On September 15, 2018, the Commission served MedPro with the OIP.

7. On September 20, 2018, MedPro filed an Answer to the OIP.

8. On October 29, 2018, MedPro filed an Exchange Act Form 8-K/A (“Form 8-K/A”) with the Commission, in which it announced the resignation of its sole remaining officer and director.

9. Following the filing of its Form 8-K/A, MedPro advised the Division that it would no longer contest the proceeding against it or oppose the Division’s revocation of its registrations of securities with the Commission. However, MedPro declined to enter into a settlement agreement with the Division and opted, instead, to require the Division to obtain a default judgement against it. MedPro did, however, agree to withdraw its previously-filed Answer to the OIP.

10. On April 8, 2019, MedPro withdrew its Answer to the OIP.

11. Attached hereto as Exhibit 1 is a chart prepared from the Commission’s EDGAR database of delinquent periodic filings due from MedPro, for the period from December 31, 2013, through May 15, 2019. The first column indicates the types of delinquent periodic reports at issue. The second column indicates the period ending-date for the periodic report in question. The third column indicates the due-date for the periodic report. The fourth column indicates whether the periodic report was filed (if a periodic report was filed, its filing date is listed). The fifth column indicates the number of months that the periodic report was late. The sixth column indicates whether a Notification of Late Filing on Exchange Act Form 12b-25 (“Form 12b-25”) was filed for the periodic report in question.

12. As set forth in the first entry of Exhibit 1, MedPro’s Form 10-K, for the period ending December 31, 2013, was due on March 31, 2014. However, MedPro did not file it with the Commission, and, as of July 22, 2019, it is approximately 64-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-K.

13. As set forth in the second entry of Exhibit 1, MedPro's Form 10-Q, for the period ending March 31, 2014, was due on May 15, 2014. However, MedPro did not file it with the Commission, and, as of July 22, 2019, it is approximately 62-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-Q.

14. As set forth in the third entry of Exhibit 1, MedPro's Form 10-Q, for the period ending June 30, 2014, was due on August 14, 2014. However, MedPro did not file it with the Commission, and, as of July 22, 2019, it is approximately 59-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-Q.

15. As set forth in the fourth entry of Exhibit 1, MedPro's Form 10-Q, for the period ending September 30, 2014, was due on November 14, 2014. However, MedPro did not file it with the Commission, and, as of July 22, 2019, it is approximately 56-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-Q.

16. As set forth in the fifth entry of Exhibit 1, MedPro's Form 10-K, for the period ending December 31, 2014, was due on March 31, 2015. However, MedPro did not file it with the Commission, and, as of July 22, 2019, it is approximately 52-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-K.

17. As set forth in the sixth entry of Exhibit 1, MedPro's Form 10-Q, for the period ending March 31, 2015, was due on May 15, 2015. However, MedPro did not file it with the Commission, and, as of July 22, 2019, it is approximately 50-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-Q.

18. As set forth in the seventh entry of Exhibit 1, MedPro's Form 10-Q, for the period ending June 30, 2015, was due on August 14, 2015. However, MedPro did not file it with the

Commission, and, as of July 22, 2019, it is approximately 47-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-Q.

19. As set forth in the eighth entry of Exhibit 1, MedPro's Form 10-Q, for the period ending September 30, 2015, was due on November 16, 2015. However, MedPro did not file it with the Commission, and, as of July 22, 2019, it is approximately 44-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-Q.

20. As set forth in the ninth entry of Exhibit 1, MedPro's Form 10-K, for the period ending December 31, 2015, was due on March 30, 2016. However, MedPro did not file it with the Commission, and, as of July 22, 2019, it is approximately 40-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-K.

21. As set forth in the tenth entry of Exhibit 1, MedPro's Form 10-Q, for the period ending March 31, 2016, was due on May 16, 2016. However, MedPro did not file it with the Commission, and, as of July 22, 2019, it is approximately 38-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-Q.

22. As set forth in the eleventh entry of Exhibit 1, MedPro's Form 10-Q, for the period ending June 30, 2016, was due on August 15, 2016. However, MedPro did not file it with the Commission, and, as of July 22, 2019, it is approximately 35-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-Q.

23. As set forth in the twelfth entry of Exhibit 1, MedPro's Form 10-Q, for the period ending September 30, 2016, was due on November 14, 2016. However, MedPro did not file it with the Commission, and, as of July 22, 2019, it is approximately 32-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-Q.

24. As set forth in the thirteenth entry of Exhibit 1, MedPro's Form 10-K, for the period ending December 31, 2016, was due on March 31, 2017. However, MedPro did not file it with the Commission, and, as of July 22, 2019, it is approximately 28-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-K.

25. As set forth in the fourteenth entry of Exhibit 1, MedPro's Form 10-Q, for the period ending March 31, 2017, was due on May 15, 2017. However, MedPro did not file it with the Commission, and, as of July 22, 2019, it is approximately 26-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-Q.

26. As set forth in the fifteenth entry of Exhibit 1, MedPro's Form 10-Q, for the period ending June 30, 2017, was due on August 14, 2017. However, MedPro did not file it with the Commission, and, as of July 22, 2019, it is approximately 23-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-Q.

27. As set forth in the sixteenth entry of Exhibit 1, MedPro's Form 10-Q, for the period ending September 30, 2017, was due on November 14, 2017. However, MedPro did not file it with the Commission, and, as of July 22, 2019, it is approximately 20-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-Q.

28. As set forth in the seventeenth entry of Exhibit 1, MedPro's Form 10-K, for the period ending December 31, 2017, was due on April 2, 2018. However, MedPro did not file it with the Commission, and, as of July 22, 2019, it is approximately 15-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-K.

29. As set forth in the eighteenth entry of Exhibit 1, MedPro's Form 10-Q, for the period ending March 31, 2018, was due on May 15, 2018. However, MedPro did not file it with

the Commission, and, as of July 22, 2019, it is approximately 14-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-Q.

30. As set forth in the nineteenth entry of Exhibit 1, MedPro's Form 10-Q, for the period ending June 30, 2018, was due on August 14, 2018. However, MedPro did not file it with the Commission, and, as of July 22, 2019, it is approximately 11-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-Q.

31. As set forth in the twentieth entry of Exhibit 1, MedPro's Form 10-Q, for the period ending September 30, 2018, was due on November 14, 2018. However, MedPro did not file it with the Commission, and, as of July 22, 2019, it is approximately eight-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-Q.

32. As set forth in the twenty-first entry of Exhibit 1, MedPro's Form 10-K, for the period ending December 31, 2018, was due on April 1, 2019. However, MedPro did not file it with the Commission, and, as of July 22, 2019, it is approximately three-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-K.

33. As set forth in the twenty-second entry of Exhibit 1, MedPro's Form 10-Q, for the period ending March 31, 2019, was due on May 15, 2019. However, MedPro did not file it with the Commission, and, as of July 15, 2019, it is approximately two-months late. MedPro also did not file a Form 12b-25 with the Commission for its delinquent Form 10-Q.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

This 7th day of August 2019.

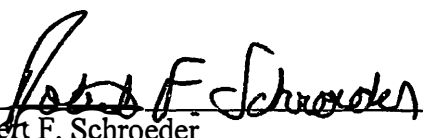

Robert F. Schroeder

Exhibit 1

MedPro Safety Products, Inc.

CIK No. 1364896

Chart of Delinquent Filings As of July 22, 2019

| Filing | Period End | Due Date | Date Filed | Months late | Form 12b-25 Filed? |
|--------|------------|----------|------------|-------------|--------------------|
| 10-K* | 12/31/13 | 03/31/14 | Not filed | 64 | No |
| 10-Q* | 03/31/14 | 05/15/14 | Not filed | 62 | No |
| 10-Q* | 06/30/14 | 08/14/14 | Not filed | 59 | No |
| 10-Q* | 09/30/14 | 11/14/14 | Not filed | 56 | No |
| 10-K* | 12/31/14 | 03/31/15 | Not filed | 52 | No |
| 10-Q* | 03/31/15 | 05/15/15 | Not filed | 50 | No |
| 10-Q* | 06/30/15 | 08/14/15 | Not filed | 47 | No |
| 10-Q* | 09/30/15 | 11/16/15 | Not filed | 44 | No |
| 10-K* | 12/31/15 | 03/30/16 | Not filed | 40 | No |
| 10-Q* | 03/31/16 | 05/16/16 | Not filed | 38 | No |
| 10-Q* | 06/30/16 | 08/15/16 | Not filed | 35 | No |
| 10-Q* | 09/30/16 | 11/14/16 | Not filed | 32 | No |
| 10-K* | 12/31/16 | 03/31/17 | Not filed | 28 | No |
| 10-Q* | 03/31/17 | 05/15/17 | Not filed | 26 | No |
| 10-Q* | 06/30/17 | 08/14/17 | Not filed | 23 | No |
| 10-Q* | 09/30/17 | 11/14/17 | Not filed | 20 | No |
| 10-K* | 12/31/17 | 04/02/18 | Not filed | 15 | No |
| 10-Q* | 03/31/18 | 05/15/18 | Not filed | 14 | No |
| 10-Q* | 06/30/18 | 08/14/18 | Not filed | 11 | No |
| 10-Q* | 09/30/18 | 11/14/18 | Not filed | 8 | No |
| 10-K* | 12/31/18 | 04/01/19 | Not filed | 3 | No |
| 10-Q* | 03/31/19 | 05/15/19 | Not filed | 2 | No |