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UNITED STATES OF AMERICA Before the SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING FILE No. 3-19303

In the Matter of

QUICKSILVER STOCK TRANSFER, LLC, aka QUICKSILVER STOCK TRANSFER CORPORATION,

Respondent.

ANSWER TO ALLEGATIONS IN ORDER INSTITUTING ADMINISTRATIVE PROCEEDINGS PURSUANT TO SECTION 17A(c)(3)(A) OF THE SECURITIES EXCHANGE ACT OF 1934 AND NOTICE OF HEARING

Respondent, Quicksilver Stock Transfer, LLC, which has been sold and is now known as Quicksilver Stock Transfer Corporation, by and through their attorney, Barney C. Ales, Esq. of Barney C. Ales, Ltd, and hereby submit their Answer to Allegations in Order Instituting Administrative Proceedings Pursuant to Section 17A(c)(3)(A) of the Securities Exchange Act of 1934 and Notice of Hearing ("Order and Notice") as follow:

1. These answering respondents deny each and every allegation contained in the Order and Notice that is hereinafter not expressly admitted or otherwise pled to.

2. In response to section II. A. paragraph 1 contained in the Order and Notice, these answering respondents admit that Quicksilver Stock Transfer Corporation is a Nevada corporation, and currently has its principal place of business in Las Vegas, Nevada; and further

admits that it predecessor, Quicksilver Stock Transfer, LLC, was initially registered with the Securities and Exchange Commission as a transfer agent in or about August, 2007.

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3. In response to section II. B. paragraph 2 contained in the Order and Notice, these answering respondents, acknowledge that on or about July 26, 2019, a final judgment was entered against Quicksilver Stock Transfer, LLC permanently enjoining it from violating the Securities Exchange Act of 1934 ("Exchange Act") in the civil action entitled *Securities and Exchange Commission v. Quicksilver Stock Transfer, LLC, et al.*, Civil Action Number 2:18-cv-00131, in the United States District Court for the District of Nevada ("Civil Action").

4. In response to section II. B. paragraphs 3, 4, 5, 6, 7, 8, 9, 10, 11, and 12 contained in the Order and Notice, these answering respondents, acknowledge that the Securities and Exchange Commission ("Commission") filed the Civil Action and in its complaint filed therein made to the allegations set forth in said paragraphs.

5. In response to section II. B. paragraph 13 contained in the Order and Notice, these answering respondents deny there was a diversion of \$630,000 of China Energy's funds for unauthorized purposes; but, do acknowledge that Quicksilver Stock Transfer, LLC, made a series of payments to DTCC as well as did pay \$500,000 on or about October 2, 2013 and \$225,000 on or about October 4, 2013. As to the remainder of the allegations set forth in said paragraph, these answering respondents deny those allegations.

6. In response to section II. B. paragraphs 14 and 15 contained in the Order and Notice, these answering respondents admit the allegations contained therein.

7. In response to section II. B. paragraph 16 contained in the Order and Notice, these answering respondents acknowledge that Quicksilver Stock Transfer, LLC filed an independent accountant's report with the Commission on or about January 13, 2015 for the period ending

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December 31, 2013; as to the remainder of the allegations set forth in said paragraph, these answering respondents deny those allegations.

8. In response to section II. B. paragraph 17 contained in the Order and Notice, these answering respondents acknowledge that on or about March 1, 2019, Quicksilver Stock Transfer, LLC was sold to Quicksilver Stock Transfer Corporation pursuant to a Bill of Sale that set forth the terms of the sale; and thereafter, Quicksilver Stock Transfer Corporation properly filed a form TA-1/A, which form accurately set forth all information required by that form.

9. In response to section II. B. paragraph 18 contained in the Order and Notice, these answering respondents deny all the allegations set forth in said paragraph.

10. In response to section III. A. and B. contained in the Order and Notice, these answering respondents acknowledge they should be provided an adequate opportunity to respond to the allegations set forth in the Order and Notice as well as provided due process of law to establish their defenses to said allegations.

Dated August 29, 2019.

Respectfully Submitted,

By: <u>/s/ Barney C. Ales</u> Barney C. Ales BARNEY C. ALES, LTD. 222 Guidance Ridge Ct. Henderson, NV 89012 Mailing address: P.O. Box 20563 Las Vegas, NV 89112 Telephone: 702-998-9576 Email: attorneyales@gmail.com

In the Matter of Quicksilver Stock Transfer, LLC Administrative Proceeding File No. 3-19303 <u>SERVICE LIST</u>

Pursuant to Commission Rule of Practice 151 (17 C.F.R. §201.151), I certify that the attached:

ANSWER TO ALLEGATIONS IN ORDER INSTITUTING ADMINISTRATIVE PROCEEDINGS PURSUANT TO SECTION 17A(c)(3)(A) OF THE SECURITIES EXCHANGE ACT OF 1934 AND NOTICE OF HEARING

was served on August 29, 2019, upon the following parties as follows:

Vanessa Countryman, Acting Secretary Securities and Exchange Commission 100 F. Street, N.E., Mail Stop 1090 Washington, DC 20549-1090

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(By USPS Priority Express Mail) (Original and three copies)

with courtesy copy sent via electronic mail to: <u>APFilings@sec.gov</u>

Donald W. Searles Securities and Exchange Commission 444 S. Flower Street, Suite 900 Los Angeles, CA 90071 Email: searlesd@sec.gov

Dated: August 29, 2019

(By electronic mail and USPS)

<u>/s/ Barney C. Ales</u> Barney C. Ales