# UNITED STATES OF AMERICA Before the SECURITIES AND EXCHANGE COMMISSION

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ADMINISTRATIVE PROCEEDING File No. 3-19317

In the Matter of

BTHC X, Inc., et al.,

Respondents.

## DIVISION OF ENFORCEMENT'S MOTION FOR DEFAULT AGAINST KAMA RESOURCES AND BRIEF IN SUPPORT

The Division of Enforcement ("Division"), by counsel, pursuant to Rules of Practice 154(a) and 155(a)(2), respectfully moves the Commission for an order entering a default against Kama Resources Inc. ("Kama") in these proceedings and ordering that the registration of each class of Kama's securities registered pursuant to Section 12 of the Securities Exchange Act of 1934 (the "Exchange Act") be revoked.

#### Argument

On August 6, 2019, the Commission issued an Order Instituting Proceedings (the "OIP") against Kama, which has securities registered with the Commission under Section 12(g) of Exchange Act. The OIP alleges that Kama is delinquent in filing its mandated periodic reports. To date, Kama has failed to answer or otherwise respond to the OIP. Accordingly, the Division seeks entry of an order finding respondent Kama Resources Inc. to be in default in this proceeding.

The Declaration of Joseph Griffin to Assist Secretary with Record of Service (attached hereto as Exhibit 1) establishes that Kama was served with the Order Instituting Proceedings

("OIP") by actual Express Mail delivery in accordance with Commission Rule of Practice 141(a)(2)(ii). In addition to the OIP, Kama was also served with a letter offering the Division's investigative file for inspection and copying pursuant to Rule of Practice 230. Kama has not filed an answer in this proceeding

Based on Kama's failure to answer, the Division additionally seeks an order revoking the registration of each class of Kama's securities. Kama is delinquent in its filings with the Commission and has been delinquent for over two years. Accordingly, the Division moves for an order, pursuant to Rule 155(a)(2), finding these respondents to be in default in this proceeding and ordering that the registration of each class of their securities registered pursuant to Exchange Act Section 12 be revoked.

#### Conclusion

For the reasons set forth above, the Division respectfully requests that the Commission:
(1) grant this Motion; (2) enter an order of default against Kama; and (3) revoke the registration of each class of Kama's securities registered pursuant to Section 12 of the Exchange Act.

Kama filed a Form 15 on September 6, 2019, one month after the OIP was filed, and long after Kama's answer to the OIP was due. As noted above, Kama has failed to file an answer to the OIP. The Division requests an order finding Kama in default and entering an order of revocation against it before Kama's Form 15 becomes effective on December 5, 2019. Revocation is the appropriate remedy for Kama's failure to file its periodic reports, particularly since, absent an order of revocation, Kama's stock can continue to trade on the Pink Sheets both before and after its Form 15 becomes effective.

Revocation will ensure that until Kama becomes current and compliant on its past and current filings, its shares cannot be traded publicly on the open market (but may be traded privately). See Eagletech Communications, Inc., Exchange Act Release No. 54095, 2006 SEC LEXIS 1534 at \*9 (July 5, 2006) (revocation would lessen, but not eliminate, shareholders abilities to transfer their securities) and Blink Technologies, Initial Decision Release No. 1134, 2017 LEXIS 1405 at \*8-9 (May 11, 2017) (noting that issuer's stock might trade on OTC Link, but no member of a national securities exchange, broker, or dealer would be able to participate).

Dated: September 27, 2019

Respectfully submitted,

James Carlson

(202) 551-3711

Joseph Griffin

(202) 551-4832

Securities and Exchange Commission

100 F Street, N.E., Room 5703

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 Motion for Default and Brief in Support were served on the following on this September 27, 2019, in the manner indicated below:

By Hand:

The Office of the Secretary Securities and Exchange Commission 100 F Street, N.E. Washington, D.C. 20549-2557

By Certified Mail
American Corporate Register Inc.
711 Carson Street, Suite 6
Carson City, NV 89701
(Registered Agent for Kama Resources, Inc.)

James Carlson

# EXHIBIT 1



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

ADMINISTRATIVE PROCEEDING File No. 3-19317

In the Matter of

BTHC X, Inc., et al.,

Respondents.

## DECLARATION OF JOSEPH GRIFFIN TO ASSIST SECRETARY WITH RECORD OF SERVICE

JOSEPH GRIFFIN, pursuant to 28 U.S.C. § 1746, declares:

- 1. I am a Senior Counsel with the Division of Enforcement ("Division") of the Securities and Exchange Commission, and co-counsel for the Division in the captioned administrative proceeding. I am submitting this Declaration to assist the Secretary in maintaining a record of service on the respondents in the captioned proceedings pursuant to Rule 141(a)(3).
- 2. Among other means, Securities and Exchange Commission ("Commission")
  Rule of Practice 141(a)(2)(ii) permits service on a corporation or entity by delivering a
  copy of an Order Instituting Administrative Proceedings ("OIP") to an agent authorized
  by appointment or law to receive such service or, in the case of an issuer with a class of
  securities registered with the Commission, by sending the OIP via U.S. Postal Service
  certified, registered, or Express Mail and obtaining a confirmation of attempted delivery
  on the most recent address shown on the entity's most recent filing with the Commission.

Further, the OIP in this matter authorizes service of the OIP "by any means permitted by the Commission's Rules of Practice." Therefore, the Division asked the Commission's Secretary to first attempt service on the Respondents via U.S. Priority Mail Express.

- 3. The Office of the Secretary provided me with the U.S. Priority Mail Express tracking numbers for the copies of the Order Instituting Proceedings ("OIP")<sup>1</sup> that were mailed by the Secretary to the respondents in these proceedings. I input each of the tracking numbers into the U.S. Postal Service's ("USPS's") package tracking system on its Internet website located at <a href="www.usps.com">www.usps.com</a>, and printed out the tracking confirmations in order to obtain confirmation of the delivery or attempted delivery of the OIP on each respondent. A true copy of the tracking confirmations for all of the respondents for whom express mail service was attempted is attached as Exhibit 1, hereto.
- 4. The Secretary mailed the OIP to respondent Eco Building Products, Inc., CIK 1409885 ("ECOB"), via Priority Mail Express, Tracking No. EF 200198683 US, to the address shown on its most recent EDGAR filing at 11568 Sorrento Valley Road Suite 13, San Diego, CA 92121. This address is taken from ECOB's last filing with the Commission, which was a Form 8-K filed with the Commission on April 3, 2018. The USPS tracking system confirms that Delivery was attempted on August 9, 2019. The package was returned as addressee unknown. See Exhibit 1 at p. 7.
- 5. In order to determine if mail service is an acceptable means of service in the United Kingdom, I determined that both the United Kingdom and the United States are signatories to the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters ("The Hague Convention"), 20 U.S.T. 361,

<sup>&</sup>lt;sup>1</sup>Each service package included the OIP, a letter from the Commission's Secretary, and a letter from the Division offering discovery pursuant to Rule of Practice 230.

T.I.A.S. 6638, 658 U.N.T.A. 163 (1964). Article 10(a) of the Hague Convention provides that, unless the country of destination objects, parties may send judicial documents directly to persons abroad through postal channels. The United Kingdom does not object to such service. Richardson v. Att'y Gen. of the Virgin Is., 2013 U.S. Dist. LEXIS 117763, at \*29 (D. V.I. Aug. 20, 2013); Guy Carpenter & Co., L.L.C. v. Samengo-Turner, 2007 U.S. Dist. LEXIS 42730 at \*7 (S.D.N.Y. June 14, 2007). The Secretary mailed the OIP to respondent BTHC X, Inc., CIK 1375685 ("BTXI"), via Priority Mail Express, Tracking No. EZ 092340277 US, to the address shown on its most recent EDGAR filing at 1st Floor, Chapel House, 1-3 Chapel Street, Guildford, Surrey GU1 3UH, United Kingdom. This address is taken from BTXI's last filing with the Commission, which was a Form 8-K/A filed with the Commission on August 28, 2017. The USPS tracking system confirms that Delivery was attempted on August 13, 2019. The package was returned on September 3, 2019. See Exhibit 1 at pp. 1-2.

6. Although its last address is in China, Kama Resources Inc., CIK 1479239 ("KAMX"), KAMX is a defaulted Nevada corporation. A search of the website of the Nevada Secretary of State revealed that name and address KAMX's registered agent are American Corporate Register Inc., 711 Carson Street, Suite 6, Carson City, Nevada 89701. A true copy of a printout of the KAMX's corporate status page from that website is attached hereto as Exhibit 2. Therefore, the Division provided this address to the Office of the Secretary and requested that the Secretary attempt service KAMX's Nevada registered agent via Priority Express Mail. The Secretary mailed the OIP to KAMX's registered agent at the address referenced above via Express Mail, Tracking No.

EF200198652US. My search of the USPS tracking system, at <a href="www.usps.com">www.usps.com</a>, confirmed that the package was delivered on August 8, 2019. See Exhibit 1 at p. 11.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 26, 2019.

4

# EXHIBIT 1

## USPS Tracking FAQs > (https://www.usps.com/faqs/uspstracking-faqs.htm)

### Track Another Package +

Tracking Number: EZ092340277US

Remove X

**Scheduled Delivery by** 

### **TUESDAY**

13 AUGUST 2019 ()

Feedbac

## **Oblivered**

September 3, 2019 at 8:03 am Delivered WASHINGTON, DC 20549

Get Updates ✓

**Text & Email Updates** 

**V** 

**Tracking History** 

ヘ

September 3, 2019, 8:03 am

Delivered

WASHINGTON, DC 20549

Your item was delivered at 8:03 am on September 3, 2019 in WASHINGTON, DC 20549 to SEC 20549 R26. The item was signed for by R WILLIS.

September 3, 2019, 6:27 am Arrived at Post Office WASHINGTON, DC 20018

September 2, 2019, 5:19 am
Departed USPS Regional Facility
WASHINGTON DC DISTRIBUTION CENTER

September 2, 2019, 4:31 am
Arrived at USPS Regional Facility
WASHINGTON DC DISTRIBUTION CENTER

September 1, 2019, 5:44 pm
Arrived at USPS Regional Facility
JAMAICA NY INTERNATIONAL DISTRIBUTION CENTER

September 1, 2019, 11:24 am Processed Through Facility ISC NEW YORK NY(USPS)

August 16, 2019, 10:15 am Attempted Delivery Abroad UNITED KINGDOM

August 16, 2019, 6:07 am Arrival at Post Office UNITED KINGDOM

August 15, 2019, 12:49 pm Incorrect Address - Will attempt delivery on next working day UNITED KINGDOM

August 13, 2019, 7:34 pm Attempted Delivery Abroad UNITED KINGDOM

#### August 13, 2019, 10:38 am

Addressee not available - Scheduled for another delivery attempt today UNITED KINGDOM

August 13, 2019, 6:07 am Arrival at Post Office UNITED KINGDOM

August 12, 2019, 11:06 am
Processed through Facility
COVENTRY PARCELFORCE, UNITED KINGDOM

August 12, 2019, 11:04 am Processed Through Facility UNITED KINGDOM

August 9, 2019, 9:04 am
Departed
LONDON, UNITED KINGDOM

August 8, 2019, 7:31 pm
Departed
NEW YORK, UNITED STATES

August 8, 2019, 4:05 pm Arrived NEW YORK, UNITED STATES

August 8, 2019, 12:50 pm
Processed Through Regional Facility
JAMAICA NY INTERNATIONAL DISTRIBUTION CENTER

August 8, 2019, 12:49 pm
Arrived at Regional Facility
JAMAICA NY INTERNATIONAL DISTRIBUTION CENTER

August 7, 2019, 10:21 pm
Departed USPS Regional Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

August 7, 2019, 8:32 pm

Arrived at USPS Regional Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

August 7, 2019, 5:14 pm Departed Post Office WASHINGTON, DC 20002

August 7, 2019, 4:03 pm USPS in possession of item WASHINGTON, DC 20002

**Product Information** 

~

See Less ∧

## Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs (https://www.usps.com/faqs/uspstracking-faqs.htm)

## USPS Tracking FAQs > (https://www.usps.com/faqs/uspstracking-faqs.htm)

#### Track Another Package +

Remove X Tracking Number: EF200198683US Scheduled Delivery by **FRIDAY** 12:00pm (i) **⊘** Delivered August 13, 2019 at 11:03 am Delivered WASHINGTON, DC 20549 Get Updates ∨ **Text & Email Updates Proof of Delivery Tracking History** 

Your item was delivered at 11:03 am on August 13, 2019 in WASHINGTON, DC 20549 to SEC

August 13, 2019, 11:03 am

WASHINGTON, DC 20549

20549 R26. The item was signed for by C HARRIS.

Delivered

Exhibit 1, Page 6

August 13, 2019, 10:19 am Arrived at Post Office WASHINGTON, DC 20018

August 13, 2019, 8:21 am
Arrived at USPS Regional Facility
WASHINGTON DC V STREET DISTRIBUTION CENTER

August 12, 2019, 7:19 pm
Arrived at USPS Regional Facility
DENVER CO DISTRIBUTION CENTER

August 12, 2019, 3:29 pm Arrived at USPS Facility DENVER, CO 80218

August 10, 2019, 7:52 pm
Departed USPS Regional Facility
DENVER CO DISTRIBUTION CENTER

August 9, 2019, 10:51 am Addressee Unknown DENVER, CO 80203

August 9, 2019, 10:11 am Addressee Unknown DENVER, CO 80203

August 9, 2019, 8:53 am Arrived at Post Office DENVER, CO 80218

August 8, 2019, 3:55 pm Forwarded DENVER, CO August 8, 2019, 3:53 pm Arrived at Post Office DENVER, CO 80266

August 8, 2019, 3:45 pm USPS in possession of item DENVER, CO 80266

August 8, 2019, 3:25 pm
Arrived at USPS Regional Facility
DENVER CO DISTRIBUTION CENTER

August 8, 2019, 1:03 pm Departed USPS Facility DENVER, CO 80204

August 8, 2019, 9:33 am Arrived at USPS Facility DENVER, CO 80204

August 8, 2019, 8:26 am
Departed USPS Regional Facility
DENVER CO DISTRIBUTION CENTER

August 8, 2019, 7:25 am
Arrived at USPS Regional Facility
DENVER CO DISTRIBUTION CENTER

August 7, 2019, 10:21 pm
Departed USPS Regional Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

August 7, 2019, 8:25 pm
Arrived at USPS Regional Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

#### See Less ∧

### Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs (https://www.usps.com/faqs/uspstracking-faqs.htm)

# Feedback

### The easiest tracking number is the one you don't have to know.

With Informed Delivery®, you never have to type in another tracking number. Sign up to:

- See images\* of incoming mail.
- Automatically track the packages you're expecting.
- Set up email and text alerts so you don't need to enter tracking numbers.

## USPS Tracking® FAQs > (https://www.usps.com/faqs/uspstracking-faqs.htm)

### Track Another Package +

Tracking Number: EF200198652US

Remove X

Your item was delivered at 10:56 am on August 8, 2019 in CARSON CITY, NV 89701. The item was signed for by H I.

## **⊘** Delivered

August 8, 2019 at 10:56 am Delivered CARSON CITY, NV 89701

Get Updates ✓

Feedback

Text & Email Updates	~
Proof of Delivery	<b>\</b>
Tracking History	^

August 8, 2019, 10:56 am

Delivered

CARSON CITY, NV 89701

Your item was delivered at 10:56 am on August 8, 2019 in CARSON CITY, NV 89701. The item was signed for by H I.

August 8, 2019, 10:06 am Arrived at Post Office CARSON CITY, NV 89701

August 8, 2019, 7:37 am
Arrived at USPS Regional Facility
RENO NV DISTRIBUTION CENTER

August 7, 2019, 10:21 pm
Departed USPS Regional Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

August 7, 2019, 8:25 pm

Arrived at USPS Regional Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

Product Information S

See Less ∧

### Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs (https://www.usps.com/faqs/uspstracking-faqs.htm)

# EXHIBIT 2

NTITY INFORMATION	 		 	
ENTITY INFORMATION				
Entity Name:				
KAMA RESOURCES INC.		•	•	
Entity Number:				
E0567482009-3				
Entity Type:				
Domestic Corporation (78)				
Entity Status:				
Default				
Formation Date:				
10/19/2009				
NV Business ID:				
NV20091507883				
Termination Date:				
Perpetual				
Annual Report Due Date:				
10/31/2018				
REGISTERED AGENT INFORMATION	 		 N	
Name of Individual or Legal Entity:	 			

AMERICAN CORPORATE REGISTER INC.

Active
CRA Agent Entity Type:
CRA - Corporation
Registered Agent Type:
Commercial Registered Agent
NV Business ID:
Office or Position:
Jurisdiction:
NEVADA
Street Address:
711 S CARSON STREET STE 6, Carson City, NV, 89701, USA
Email Address:
newcorporation@aol.com
Mailing Address:
Individual with Authority to Act:
Contact Phone Number:
Fictitious Website or Domain Name:
PRINCIPAL OFFICE ADDRESS
Address:
Mailing Address:

Status:

OFFICER INFORMATION											
☐ VIEW HISTORICAL DATA											
Title	Name	Address				Last Updated	Status				
President	DAYONG SUN	711 S CAI USA	RSON ST., STE	6, CARSON CITY	, NV, 89701,	10/31/2017	Active				
Secretary	Daylong Sun	711 S CAI USA	rson St., Ste	6, CARSON CITY	, NV, 89701,	10/31/2017	Active				
Treasurer	DAYONG SUN	711 S CAI USA	RSOŅ ST., STE	6, CARSON CITY	, NV, 89701,	10/31/2017	Active				
Director	DAYONG SUN	711 S CA	RSON ST., STE	6, CARSON CITY	, NV, 89701,	10/31/2017	Active				
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0											
Total Aut	horized Capital:		•								
75,000											
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