# 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.

## DIVISION OF ENFORCEMENT'S MOTION FOR DEFAULT 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 Securities and Exchange Commission ("Commission") for an order entering a default against BTHC X, Inc. ("BTHC") in these proceedings and ordering that the registration of each class of BTHC'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 BTHC, which has securities registered with the Commission under Section 12(g) of Exchange Act. The OIP alleges that BTHC is delinquent in filing its mandated periodic reports. Because BTHC failed to answer or otherwise respond to the OIP, the Division seeks entry of an order finding BTHC 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 Respondents were served with the Order Instituting

Proceedings ("OIP") by attempted Express Mail delivery in accordance with Commission Rule

of Practice 141(a)(2)(ii). In addition to the OIP, BTHC was also served with a letter offering the Division's investigative file for inspection and copying pursuant to Rule of Practice 230. However, BTHC did not file an answer or make any other response to the OIP in this proceeding

BTHC is delinquent in its filings with the Commission and has been delinquent for over two years. In addition, BTHC's failure to answer supports revocation of the registration of each class of BTHC's securities. Accordingly, the Division moves for an order, pursuant to Rule 155(a)(2), finding BTHC to be in default in this proceeding and ordering that the registration of each class of its 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 BTHC; and (3) revoke the registration of each class of its securities registered pursuant to Section 12 of the Exchange Act.

Dated: October 1, 2019

Respectfully submitted,

James Carlson Joseph Griffin (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 October 1, 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 Priority Mail Express International: BTHC X, Inc. 1st Floor, Chapel House, 1-3 Chapel Street Guilford, Surrey GU1 3UH United Kingdom

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 <u>www.usps.com</u>, 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.

# 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 (i)

Feedback

### **⊘** Delivered

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

Get Updates ✓

**Text & Email Updates** 

**V** 

**Tracking History** 



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 AUGUST** 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

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

Feedback

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)

Feedbac

### 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

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 

Text & Email Updates

Proof of Delivery

August 8, 2019, 10:56 am

**Tracking History** 

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** 

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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

ENTITY	INFORMATION				
Entity	y Name:				
KAM	A RESOURCES IN	C.		•	• .
Entity	y Number:				
E056	7482009-3				
Entity	y Type:				
Dome	estic Corporation (7	<b>78</b> )			
Entity	y Status:				
Defa	ult				
Form	nation Date:				
10/19	9/2009				
NV B	Business ID:				
NV20	0091507883				
Term	nination Date:				
Perp	etual				
Annı	ual Report Due Da	ite:			
10/31	1/2018				

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 CARSON USA	I ST., STE 6,	CARSON CITY,	NV, 89701,	10/31/2017	Active
Secretary	Daylong Sun	711 S CARSON USA	I ST., STE 6,	CARSON CITY,	NV, 89701,	10/31/2017	Active
Treasurer	DAYONG SUN	711 S CARSON	I ST., STE 6,	CARSON CITY,	NV, 89701,	10/31/2017	Active
Director	DAYONG SUN	711 S CARSON USA	I ST., STE 6,	CARSON CITY,	NV, 89701,	10/31/2017	Active
Page 1 of	1, records 1 to 4 of	4					
CURREN	T SHARES						
Class/Serio	es	Туре	S	hare Number	Va	lue	
		Authorized	7	5,000,000	0.0	001000000000	
Page 1 of	1, records 1 to 1 of	1					
Number o	of No Par Value	Shares:					
0							
Total Auti	norized Capital:				•		
75,000	₹,						
		Filin	g History	Name Hist	tory Me	ergers/Conve	rsions

Return to Search

Return to Results