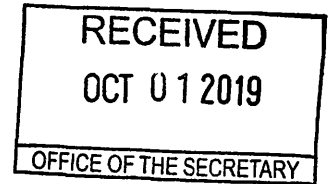


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING
File No. 3-19321

In the Matter of

Sweetwater Investing, 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 Sweetwater Investing, Inc. ("Sweetwater") and Thunor International, Inc. ("Thunor") (collectively "Respondents") in these proceedings and ordering that the registration of each class of Respondents' securities registered pursuant to Section 12 of the Securities Exchange Act of 1934 (the "Exchange Act") be revoked.

Argument

On August 7, 2019, the Commission issued an Order Instituting Proceedings (the "OIP") against Respondents, which have securities registered with the Commission under Section 12(g) of Exchange Act. The OIP alleges that Respondents are delinquent in filing their mandated periodic reports. Because both of the Respondents failed to answer or otherwise respond to the OIP, the Division seeks entry of an order finding respondents Sweetwater and Thunor 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 actual or attempted Express Mail delivery in accordance with Commission Rule of Practice 141(a)(2)(ii). In addition to the OIP, Respondents were also served with a letter offering the Division’s investigative file for inspection and copying pursuant to Rule of Practice 230. However, neither of the Respondents have filed an answer or made any other response to the OIP in this proceeding

The Respondents at issue are delinquent in their filings with the Commission and have been delinquent for over five years. In addition, the Respondents’ failure to answer supports revocation of the registration of each class of the Respondents’ securities. 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.

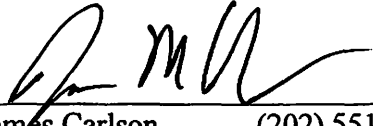
Conclusion

For the reasons set forth above, the Division respectfully requests that the Commission:

(1) grant this Motion; (2) enter an order of default against Sweetwater and Thunor; and (3) revoke the registration of each class of their securities registered pursuant to Section 12 of the Exchange Act.

Dated: October 1, 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 October 1, 2019, in the manner indicated below:

By Hand:

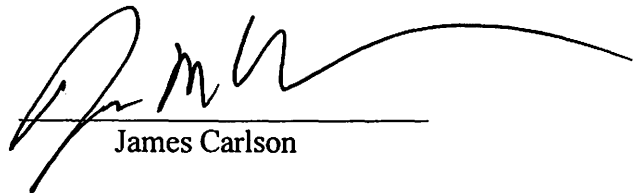
The Office of the Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-2557

By Certified Mail:

Sweetwater Investing, Inc.
167 East Mountain Peak Dr.
Draper, UT 84020

By Certified Mail:

Thunor International, Inc.
535 N. Michigan Avenue, Suite 608
Chicago, IL 60611



James Carlson

EXHIBIT 1



UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-19321

In the Matter of

Sweetwater Investing, 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”)¹ 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 www.usps.com, 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 Sweetwater Investing, Inc., CIK 1101096 (“Sweetwater”), via Priority Mail Express, Tracking No. EF 200198564 US, to the address shown on its most recent EDGAR filing at 167 East Mountain Peak Dr., Draper, UT 84020. This address is taken from Sweetwater’s last filing with the Commission, which was a Form 10QSB filed with the Commission on June 30, 2004. The USPS tracking system confirms that The package was delivered on August 8, 2019. See Exhibit 1 at p. 1.

5. The Secretary mailed the OIP to respondent Thunor International, Inc., CIK 1137261 (“Thunor”), via Priority Mail Express, Tracking No. EF 200198578 US, to the address shown on its most recent EDGAR filing at 535 N. Michigan Avenue, Suite 608,

¹Each 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.

Chicago, IL 60611. This address is taken from Thunor's last filing with the Commission, which was a Form NTN 10K filed with the Commission on March 29, 2002. The USPS tracking system confirms that The package was delivered on August 8, 2019. See Exhibit 1 at p. 4.

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

Executed on September 18, 2019.

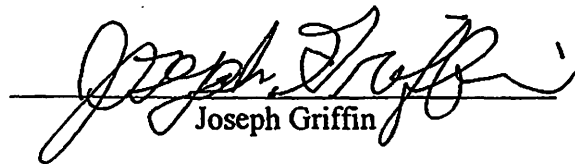

Joseph Griffin

EXHIBIT 1

Track Another Package +

Tracking Number: EF200198564US

Remove X

Your item was delivered in or at the mailbox at 11:06 am on August 8, 2019 in DRAPER, UT 84020.

 **Delivered**

August 8, 2019 at 11:06 am
Delivered, In/At Mailbox
DRAPER, UT 84020

Feedback

Get Updates 

Text & Email Updates



Proof of Delivery



Tracking History



August 8, 2019, 11:06 am
Delivered, In/At Mailbox
DRAPER, UT 84020

Your item was delivered in or at the mailbox at 11:06 am on August 8, 2019 in DRAPER, UT 84020.

August 8, 2019, 9:11 am
Arrived at Post Office
DRAPER, UT 84020

August 8, 2019, 7:33 am
Arrived at USPS Regional Facility
SALT LAKE CITY UT NETWORK DISTRIBUTION CENTER

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

August 7, 2019, 8:26 pm
Arrived at USPS Regional Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

Feedback

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>)

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.
- Enter USPS Delivery Instructions™ for your mail carrier.

Feedback

Sign Up

([https://reg.usps.com/entreg/RegistrationAction_input?](https://reg.usps.com/entreg/RegistrationAction_input?app=UspsTools&appURL=https%3A%2F%2Freg.usps.com%2Fentreg%2FRegistrationAction_input%3Fapp%3DUspsTools)

***NOTE: Black and white (grayscale) images show the outside, front of letter-sized envelopes and mailpieces that are processed through USPS automated equipment.**

Track Another Package +

Tracking Number: EF200198578US

Remove X


Your item was delivered at 11:31 am on August 8, 2019 in CHICAGO, IL 60611. Waiver of signature was exercised at time of delivery.


 **Delivered**


August 8, 2019 at 11:31 am
Delivered
CHICAGO, IL 60611

Feedback

Get Updates 

-
- Text & Email Updates** 

 - Proof of Delivery** 

 - Tracking History** 

August 8, 2019, 11:31 am
Delivered
CHICAGO, IL 60611

Your item was delivered at 11:31 am on August 8, 2019 in CHICAGO, IL 60611. Waiver of signature was exercised at time of delivery.

August 8, 2019, 9:43 am
Arrived at Post Office
CHICAGO, IL 60654

August 8, 2019, 5:40 am
Arrived at USPS Regional Facility
CHICAGO IL INTERNATIONAL DISTRIBUTION CENTER

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

August 7, 2019, 8:26 pm
Arrived at USPS Regional Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

Product Information



Feedback

See Less ^

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- Set up email and text alerts so you don't need to enter tracking numbers.
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Feedback

Sign Up

([https://reg.usps.com/entreg/RegistrationAction_input?](https://reg.usps.com/entreg/RegistrationAction_input?app=UspsTools&appURL=https%3A%2F%2Freg.usps.com%2Fentreg%2FRegistrationAction_input%3Fapp%3DUspsTools)

***NOTE: Black and white (grayscale) images show the outside, front of letter-sized envelopes and mailpieces that are processed through USPS automated equipment.**