

Office of the Secretary

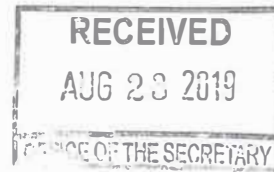
U.S. Securities and Exchange Commission

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In the Matter of Greenwood Hall, Inc., PMX Communities, Inc., and SurePure, Inc.

ADMINISTRATIVE PROCEEDING File No. 3-19339

Submission to the Office of the Secretary, U.S. Securities and Exchange Commission
as provided by Rule 220(b) of the Commission's Rules of Practice, 17 C.F.R. §
201.220(b).

August 22, 2019

Dear Sirs.

In regard to administrative proceeding, File No. 3-19339 SurePure Inc (the "Company") hereby makes submission to the Office of the Secretary, U.S. Securities and Exchange Commission as provided by Rule 220(b) of the Commission's Rules of Practice, 17 C.F.R. § 201.220(b).

Introduction and background to SurePure Group

Business Overview

SurePure Inc. market and owns the international patent for a novel liquid purification technology that uses UV, rather than heat, to sterilize liquids. Using ultraviolet C light, the photopurification process can deliver the same or superior microbiological efficacy to pasteurization on both clear and turbid liquids without the concomitant energy consumption or degradation of the liquid, either biochemically or organoleptically.

Although UV light has long been used as a surface sterilizer and has been applied to clear water successfully, this is the first technology of its kind that can process opaque or turbid liquids. Its scope of application is therefore virtually unlimited. Food-grade liquid application in beverages abound; technical application to process water and liquid raw materials, as well as liquids such as diesel are possible; even the medical application of this technology from blood to breast milk is being explored. We continue to do research work either by ourselves or in conjunction with clients to establish the efficacy on other liquids including various consumer beverages and home care products.

The heart of the SurePure photopurification technology is the Turbulator technology for which SurePure holds one United States and 16 foreign patents. The unique and self-cleaning design of the Turbulator enables the purification of turbid liquids on an industrial processing scale.

Risk analysis and financial situation

In the Form 10K of December 2016, filed with the SEC on 15 May 2017, the company highlights the risks associated with the business and these risk factors. An example of the Risk Factors that are presented follows:

- “We require immediate capital to fund our operations and repay certain obligations, and we may not be able to obtain sufficient capital and may be forced to limit the scope of our operations or to liquidate our business.
- Even if we obtain capital to fund our operations, the capital may not be sufficient to fund our strategies on which the potential growth of our business is premised.”

As regards point “A. Whether the allegations contained in Section II hereof are true and, in connection therewith, to afford the Respondents an opportunity to establish any defenses to such”

The Company does not refute the allegations and concurs with the fact that the last filing made was for the period of June 30, 2017 on Form 10-Q filed with the SEC on September 28, 2017.

As regards point “B: 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 of the Respondents identified in Section II hereof, and any successor under Exchange Act Rules 12b-2 or 12g-3, and any new corporate names of any Respondents.”

Whilst accepting the outcome of any administrative hearing the Company would like to make the following points in mitigation of the penalty:

- Filings up to Q2 2017 on Form 10-Q filed on September 28, 2017 have been made;
- Filings adequately depict the negative financial situation and risks associated therewith and the possible consequences for both current and prospective investors;
- Company is an operating business and has assets in the form of Patents for its technology;
- Company is in a process to raise additional funding;

- Company believes that the revoking of the registration of the stock would severely penalize stockholders and other parties with vested interests (including convertible note holder, creditors and employees) as funding opportunities would be further reduced;
- The Company is committed to bringing the filings to a “current” situation as a priority once the funding is secured;

In light of the above, the company would appeal to the panel for the lighter sanction.

Thank You



Guy R. Kebble.

August 22, 2019

Chief Executive Officer

SurePure, Inc.

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This document has been sent to the following parties and other persons:

BY PRIORITY MAIL EXPRESS August 22, 2019

David S. Frye, Esq.

Division of Enforcement

Securities and Exchange Commission

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