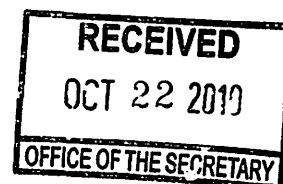


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING
File No. 3-19443

In the Matter of

Innocom Technology Holdings, Inc., The
Pulse Beverage Corporation, and
Ystrategies Corp.,

Respondents.

**DIVISION OF ENFORCEMENT'S MOTION FOR
DEFAULT AS TO INNOCOM TECHNOLOGY HOLDINGS, INC., THE PULSE
BEVERAGE CORPORATION, AND
YSTRATEGIES CORP., FOR EXPEDITED CONSIDERATION AS TO
YSTRATEGIES CORP., AND BRIEF IN SUPPORT**

Motion

On September 13, 2019, the Commission issued an Order Instituting Proceedings against Innocom Technology Holdings, Inc., The Pulse Beverage Corporation, and Ystrategies Corp (the "Respondents"), all of which have securities registered with the Commission under Section 12(g) of the Securities Exchange Act of 1934 ("Exchange Act") and are delinquent in filing their mandated periodic reports. The Division hereby moves that the Commission find that Respondents Innocom Technology Holdings, Inc. ("INCM"), The Pulse Beverage Corporation ("PLSB"), and Ystrategies Corp. ("YSTR") are in default in this proceeding and enter an order revoking the registration of each class of their securities registered pursuant to Exchange Act Section 12(g). The Division further moves that the Commission expedite its consideration of

this Motion as to YSTR and enter its decision prior to December 12, 2019, when a Form 15-12G filed by YSTR becomes effective.

Brief in Support

I. Status of the Proceeding

As shown in the Declaration of Charles Davis to Assist Secretary with Record of Service, a copy of which is attached as Exhibit 1, hereto, the Respondents were served by Priority Mail Express by or before October 8, 2019, in accordance with Rule 141(a)(2)(ii) of the Commission's Rules of Practice. None of the Respondents filed answers on or before the deadline for filing answers based on the date of service, and thus all are in default.

III. Motion for Default.

The Respondents are delinquent in their filings with the Commission. Each issuer has a class of securities registered pursuant to Exchange Act Section 12(g). The Respondents have each failed to file any periodic reports for 24 months. The Respondents failed to file answers or otherwise appear in this proceeding. Accordingly, the Division moves for an order, pursuant to Rule 155(a)(2), finding the 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.

IV. YSTR's Form 15 and Request for Expedited Consideration of this Motion as to YSTR

On September 13, 2019, presumably in response to this proceeding, YSTR filed a Form 15-12G to terminate the registration of its securities. This form will not take effect until December 12, 2019. The Division requests that the Commission give expedited consideration of this Motion as to YSTR such that any final order be entered prior to the effective date of the Form 15-12G. While YSTR's Form 15-12G would suspend its duty to file reports coming due

after the Form's effective date, it does not erase or excuse YSTR's past violations of the reporting requirements or remove YSTR securities from the market. The temporary trading suspension associated with this proceeding expired on September 27, 2019. Further, the CEO of YSTR has informed the staff that the company is in the process of preparing a Regulation A, Tier 1 offering. Should the Form 15-12G take effect, YSTR would be able to continue trading and to further delay the required filings, thus enabling the company to solicit additional funds from unsuspecting investors. Administrative Law Judges have previously held that a Form 15-12G does not preclude entry of a revocation order in similar situations. *EarthDragon Resources, Inc.*, Initial Decision Rel. No. 786, Admin. Proc. File No. 3-16467 (May 4, 2015)(on entry of default). *Blink Technologies, Inc.*, Initial Decision Rel. No. 17865, Admin. Proc. File No. 3-17865 (May 11, 2017)(contested proceeding).

Conclusion

For the reasons set forth above, the Division respectfully requests that the Commission grant the Division's Motion for Default as to the Respondents, and enter an order revoking the registration of each class of their securities registered pursuant to Exchange Act Section 12(g). The Division further requests that the Commission consider its Motion as to YSTR on an expedited basis with a final decision being entered prior December 12, 2019, *i.e.* the effective date of the Form 15-12G, after which the Commission will lose jurisdiction to enter the remedies available under Exchange Act Section 12(j).

Dated: October 21, 2019

Respectfully submitted,

Charles Davis

Charles Davis 202/551-4444
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-5553

COUNSEL FOR
DIVISION OF ENFORCEMENT

CERTIFICATE OF SERVICE

I hereby certify that I caused true copies of the Division of Enforcement's Motion for Default as to. Innocom Technology Holdings, Inc., The Pulse Beverage Corporation, and Ystrategies Corp., for Expedited Consideration as to Ystrategies Corp., and Brief in Support, and Exhibits thereto, to be served on the following on October 22, 2019, in the manner indicated below:

By Hand:

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

By Certified Mail:

Innocom Technology Holdings, Inc.
Unit 2807, 28/F., The Center
99 Queen's Road Central
Hong Kong

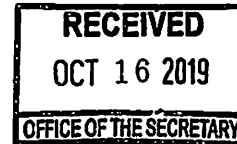
The Pulse Beverage Corporation
11678 N. Huron St. Suite 200
Northglenn, CO 80234

Ystrategies Corp.
6101 Penn Avenue, Suite 102
Pittsburgh, PA 15206

Charles Davis

Charles Davis

Exhibit 1



UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-19443

In the Matter of

Innocom Technology Holdings, Inc., *et al.*,

Respondents.

**DECLARATION OF CHARLES DAVIS
TO ASSIST THE SECRETARY WITH RECORD OF SERVICE**

CHARLES DAVIS, 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. 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 notice or, in the case of an issuer with a class of securities registered with the Commission, by sending the OIP addressed to the most recent address shown on each entity’s most recent filing with the Commission by U.S. Postal Service certified, registered, or Express Mail and obtaining a confirmation of attempted delivery. 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 each respondent for whom express mail service was attempted is attached as Exhibit 1, hereto.

4. The Secretary mailed the OIP to respondent The Pulse Beverage Corporation, CIK 1420569 (“PLSB”), via Priority Mail Express, Tracking No. EJ140717931US, to the address shown on its most recent EDGAR filing at 11678 N. Huron St. Suite 200, Northglenn, CO 80234. This address is taken from PLSB’s last filing with the Commission, which was a Form 12b-25 filed with the Commission on March 30, 2018. The USPS tracking system confirms that delivery was attempted on September 14, 2019 however there was no access to the delivery location. The item was returned to sender. See Exhibit 1 at pages 1-3.

5. The Secretary mailed the OIP to respondent Innocom Technology Holdings, Inc., CIK 1076541 (“INCM”), via Priority Mail Express, Tracking No. EZ092342012US, to the address shown on its most recent EDGAR filing at Unit 2807, 28/F., The Center 99

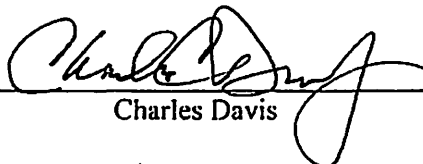
¹Each service package included the OIP, a letter from the Commission’s Secretary, and a letter from the Division offering discovery pursuant to Rule of Practice 230.

Queen's Road Central Hong Kong. This address is taken from INCM's last filing with the Commission, which was a Form 12b-25 filed with the Commission on May 15, 2018. The USPS tracking system confirms that delivery was attempted on September 18, 2019. The package was held at the post office and the addressee was notified. *See Exhibit 1 at page 5.*

6. The Secretary mailed the OIP to respondent Ystrategies Corp., CIK 1510891 ("YSTR"), via Priority Mail Express, Tracking No. EJ140717945US, to the address shown on its most recent EDGAR filing at 6101 Penn Avenue, Suite 102, Pittsburgh, PA 15206. This address is taken from YSTR's last filing with the Commission, which was a Form 12b-25 filed with the Commission on May 14, 2018. The USPS tracking system confirms that an authorized recipient was not available and notice was left on October 8, 2019. *See Exhibit 1 at page 8.*

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

Executed on 10/16, 2019.



Charles Davis