

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-19488

In the Matter of

Sea Breeze Power Corp., et al.

Respondents.

DIVISION OF ENFORCEMENT'S MOTION FOR
DEFAULT AND BRIEF IN SUPPORT

The Division of Enforcement (“Division”), by counsel, pursuant to Commission Rules of Practice Rules 154(a) and 155(a)(2) respectfully moves the Securities and Exchange Commission (“Commission”) for an order entering a default against Sea Breeze Power Corp. (CIK No. 1278145) (“Sea Breeze Power”) and 1701 Productions, Inc. (CIK No. 1558916) (“1701 Productions”) (collectively “Respondents”) in this proceeding and ordering the revocation of the registration of each class of Respondents’ securities registered pursuant to Section 12 of the Securities Exchange Act of 1934 (“Exchange Act”).

Argument

On September 23, 2019, the Commission issued an Order Instituting Proceedings (“OIP”) against Respondents which have securities registered with the Commission under Section 12(g) of the Exchange Act. The OIP alleges the Respondents are delinquent in filing their mandated periodic reports. Because each of the Respondents failed to answer or

otherwise respond to the OIP, the Division now seeks entry of an order finding respondents Sea Breeze Power and 1701 Productions to be in default in this proceeding.

Commission Rule of Practice 220(b) states that where an answer is required to be filed by rule or order, the respondent “shall do so within 20 days after service upon the respondent of the order instituting proceedings” unless a different period is provided by rule or order. Here, the OIP requires “an Answer [to be filed] to the allegations contained in this Order within ten (10) days after service of this Order.” OIP at IV. Commission Rule of Practice 160(a) provides that Saturdays, Sundays and Federal legal holidays are to be counted as part of the 10 day period, and Commission Rule of Practice 160(b) extends that time by three days if service is made by mail.

The Declaration of Gina Joyce to Assist Secretary with Record of Service (attached hereto as Exhibit A) (“Joyce Declaration”) establishes that on October 9, 2019, service upon Sea Breeze Power of the OIP, along with a letter from the Commission’s Secretary, and a letter from the Division offering discovery pursuant to Rule of Practice 230 (collectively the “Service Documents”), was attempted by Registered Mail at the address provided in its last EDGAR filing with the Commission, in accordance with Commission Rule of Practice 141(a)(2)(ii). Sea Breeze Power’s answer to the OIP was due by Tuesday, October 22, 2019. However, Sea Breeze Power has neither filed an answer nor made any other response to the OIP in this proceeding.

The Joyce Declaration also establishes that on September 25, 2019, service upon 1701 Productions of the of the Service Documents was attempted by Express Mail delivery at the address provided in its last EDGAR filing with the Commission, in accordance with Commission Rule of Practice 141(a)(2)(ii). The answer of 1701 Productions to the OIP was due on Tuesday,

October 8, 2019. However, 1701 Productions has neither filed an answer nor made any other response to the OIP in this proceeding.

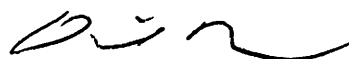
The Respondents at issue are delinquent in their filings with the Commission and have been delinquent for over two years. In addition, the Respondents' failure to answer supports revocation of the registration of each class of the Respondents' securities. Accordingly, the Division moves for an order, 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 the Division's Motion; 2) enter an order of default against Sea Breeze Power and 1701 Productions; and 3) revoke the registration of each class of their securities registered pursuant to Section 12 of the Exchange Act.

Dated: November 20, 2019

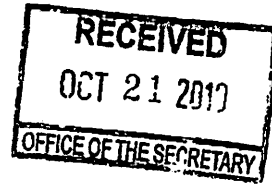
Respectfully submitted,



David Misler (202) 551-2210
Gina Joyce (202) 551-4850
Securities and Exchange Commission
100 F Street, N.E., Room 5120
Washington, D.C. 20549-5010

COUNSEL FOR
DIVISION OF ENFORCEMENT

EXHIBIT A



UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-19488

In the Matter of

Sea Breeze Power Corp., *et al.*,

Respondents.

**DECLARATION OF GINA JOYCE
TO ASSIST SECRETARY WITH RECORD OF SERVICE**

GINA JOYCE, 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 Sea Breeze Power Corp., CIK 1278145 (“Sea Breeze Power”), via Registered Mail, Tracking No. RB 843519656 US, to the address shown on its most recent EDGAR filing at Lobby Mail Box 91, 14th Floor - 333 Seymour Street, Vancouver, BC V6B 5A6, Canada. This address is taken from Sea Breeze Power’s last filing with the Commission, which was a Form 12b-25 filed with the Commission on November 30, 2009. The USPS tracking system confirms that delivery was attempted on October 9, 2019. The addressee could not be located. The package was returned. *See* Exhibit 1 at pp. 1 - 4.

5. The Secretary mailed the OIP to respondent 1701 Productions, Inc., CIK 1558916 (“1701 Productions”), via Priority Mail Express, Tracking No. EJ 140718265 US, to the address shown on its most recent EDGAR filing at P.O. Box 21271,

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.

Catonsville, MD 21228. This address is taken from 1701 Productions's last filing with the Commission, which was a Form 10-Q filed with the Commission on November 18, 2013. The USPS tracking system confirms that delivery was attempted on September 25, 2019. The addressee was unknown. The package was returned to the SEC. See Exhibit 1 at pp. 5 - 6.

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

Executed on October 21, 2019.



Gina Joyce

Track Another Package +

Tracking Number: RB843519656US

[Remove X](#)

Your package is moving within the USPS network and is on track to be delivered to its final destination. It is currently in transit to the next facility.

In-Transit

October 17, 2019
In Transit to Next Facility

[Get Updates](#) ✓

Feedback

Text & Email Updates



Tracking History



October 17, 2019

In Transit to Next Facility

Your package is moving within the USPS network and is on track to be delivered to its final destination. It is currently in transit to the next facility.

October 16, 2019, 8:12 am

Arrived at USPS Regional Facility

WASHINGTON DC DISTRIBUTION CENTER

October 15, 2019, 10:51 pm
Arrived at USPS Facility
DULLES, VA 20101

October 15, 2019, 10:44 pm
Arrived at Unit
DULLES, VA 20101

October 15, 2019, 12:37 am
Departed USPS Facility
SAN FRANCISCO, CA 94188

October 13, 2019, 4:08 pm
Arrived at USPS Regional Facility
SAN FRANCISCO CA DISTRIBUTION CENTER

October 13, 2019, 9:27 am
Processed Through Facility
ISC SAN FRANCISCO (USPS)

Feedback

Origin Post is Preparing Shipment

October 9, 2019, 9:35 am
Addressee cannot be located - Item returned to sender
CANADA

October 8, 2019, 9:20 am
Processed Through Facility
CANADA

October 8, 2019, 9:20 am
Customs Clearance
CANADA

October 8, 2019, 6:48 am

Departed
VANCOUVER, CANADA

October 7, 2019, 6:44 pm

Departed
NEW YORK, UNITED STATES

October 7, 2019, 6:43 am

Arrived
NEW YORK, UNITED STATES

October 1, 2019, 8:23 am

Processed Through Regional Facility
JAMAICA NY INTERNATIONAL DISTRIBUTION CENTER

October 1, 2019, 8:06 am

Arrived at Regional Facility
JAMAICA NY INTERNATIONAL DISTRIBUTION CENTER

September 26, 2019, 8:26 pm

Arrived at USPS Facility
DULLES, VA 20101

September 25, 2019, 10:36 pm

Departed USPS Facility
WASHINGTON, DC 20066

September 24, 2019, 10:22 pm

Arrived at USPS Regional Facility
WASHINGTON DC DISTRIBUTION CENTER

September 24, 2019, 5:02 pm

Departed Post Office
WASHINGTON, DC 20002

Feedback

September 24, 2019, 3:33 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](#)

[Feedback](#)

USPS Tracking®

[FAQs >](#)

[Track Another Package +](#)

Tracking Number: EJ140718265US

[Remove X](#)

Scheduled Delivery by

THURSDAY

26

SEPTEMBER
2019 ⓘ

by

12:00pm ⓘ

 **Delivered**

September 26, 2019 at 10:54 am

Delivered

WASHINGTON, DC 20549

[Get Updates](#) ▾

Text & Email Updates ▾

Proof of Delivery ▾

Tracking History ▲

September 26, 2019, 10:54 am

Delivered

WASHINGTON, DC 20549

Your item was delivered at 10:54 am on September 26, 2019 in WASHINGTON, DC 20549 to SEC 20549 R26. The item was signed for by M BIGBE.

10/4/2019

USPS.com® - USPS Tracking® Results

September 26, 2019, 10:21 am
Arrived at Post Office
WASHINGTON, DC 20018

September 25, 2019, 10:31 pm
Departed USPS Regional Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

September 25, 2019, 11:13 am
Addressee Unknown
CATONSVILLE, MD 21228

September 25, 2019, 8:55 am
Addressee Unknown
CATONSVILLE, MD 21228

September 24, 2019, 10:42 pm
USPS in possession of item
ROSEDALE, MD 21237

September 24, 2019, 7:40 pm
Arrived at USPS Regional Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

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

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 26 day of November, 2019, in the manner indicated below:

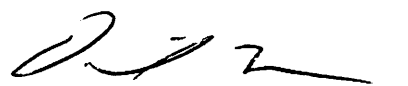
By Hand:
Office of the Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-2557

By UPS:

1701 Productions, Inc.
P.O. Box 21271
Catonsville, MD 21228

By UPS:

Sea Breeze Power Corp.
Lobby Mail Box 91
14th Floor - 333 Seymour Street
Vancouver, BC V6B 5A6
Canada



David Misler