

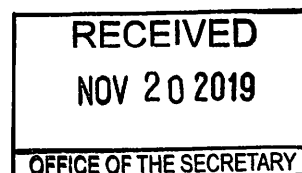
UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-19505

In the Matter of

RARAN Corporation, *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 RARAN Corp. (CIK No. 1367398) ("Raran"), Refco Public Commodity Pool, L.P. (CIK No. 1255107) ("Refco"), and Rent USA, Inc. (CIK No. 1099946) ("Rent USA") (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 24, 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 Raran, Refco, and Rent USA 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 September 26, 2019, Raran was served with 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”), 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). Raran’s answer to the OIP was due by Wednesday, October 9, 2019. However, Raran has neither filed an answer nor made any other response to the OIP in this proceeding.

The Joyce Declaration also establishes that on September 26, 2019, service upon Refco 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). Refco’s answer to the OIP was due by Wednesday, October 9, 2019. However, Refco has neither filed an answer nor made any other response to the OIP in this proceeding.

The Joyce Declaration additionally establishes that on September 27, 2019, service upon Rent USA 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). Rent USA's answer to the OIP was due by Thursday, October 10, 2019. However, Rent USA has neither filed an answer nor made any other response to the OIP in this proceeding.

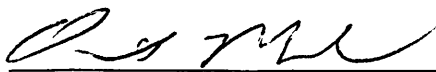
The Respondents at issue are delinquent in their filings with the Commission and have been delinquent for over two years. In addition, the Respondents' failure to answer supports revocation of the registration of each class of the Respondents' securities. Accordingly, the Division moves for an order, 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 Raran, Refco, and Rent USA; and 3) revoke the registration of each class of their securities registered pursuant to Section 12 of the Exchange Act.

Dated: November 20, 2019

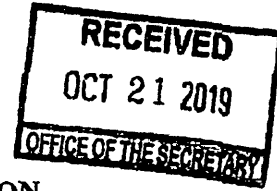
Respectfully submitted,


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. 3-19505

In the Matter of

RARAN Corporation, *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 RARAN Corporation, CIK 1367398 (“Raran”), via Priority Mail Express, Tracking No. EJ 140718185 US, to the address shown on its most recent EDGAR filing at 1300 E. Lafayette, Suite 905, Detroit, MI 48207. This address is taken from Raran’s last filing with the Commission, which was a Form 10QSB filed with the Commission on November 6, 2006. The USPS tracking system confirms that the package was delivered on September 26, 2019. *See* Exhibit 1 at pp. 1 - 2.

5. The Secretary mailed the OIP to respondent Refco Public Commodity Pool, L.P., CIK 1255107 (“Refco”), via Priority Mail Express, Tracking No. EJ 140718296 US, to the address shown on its most recent EDGAR filing at c/o RefcoFundHoldings, LLC, One World Financial Center, 200 Liberty Street -- Tower A, New York, NY 10281.

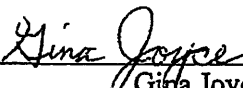
¹Each service package included the OIP, a letter from the Commission’s Secretary, and a letter from the Division offering discovery pursuant to Rule of Practice 230.

This address is taken from Refco's last filing with the Commission, which was a Form 8-K filed with the Commission on September 29, 2006. The USPS tracking system confirms that delivery was attempted on September 26, 2019. Mail forwarding had expired and the addressee was unknown. The package was returned to the SEC.. See Exhibit 1 at pp. 3 - 5.

6. The Secretary mailed the OIP to respondent Rent USA, Inc., CIK 1099946 ("Rent USA"), via Priority Mail Express, Tracking No. EJ 140718225 US, to the address shown on its most recent EDGAR filing at PO Box 10, San Dimas, CA 91733. This address is taken from Rent USA's last filing with the Commission, which was a Form 8-K/A filed with the Commission on December 5, 2000. The USPS tracking system confirms that the package was delivered on September 27, 2019, but on October 15, 2019, the package was taken to the post office to be returned to the SEC. See Exhibit 1 at pp. 6 - 8.

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

Executed on October 21, 2019.



Gina Joyce

USPS Tracking®

[FAQs >](#)

[Track Another Package +](#)

Tracking Number: EJ140718185US

[Remove X](#)

Scheduled Delivery by

FRIDAY

27 SEPTEMBER 2019 ⓘ **by 12:00pm** ⓘ

 **Delivered**

September 26, 2019 at 10:06 am
Delivered
DETROIT, MI 48207

[Get Updates](#) ▾

Text & Email Updates ▾

Proof of Delivery ▾

Tracking History ▲

September 26, 2019, 10:06 am
Delivered
DETROIT, MI 48207

Your item was delivered at 10:06 am on September 26, 2019 in DETROIT, MI 48207. Waiver of signature was exercised at time of delivery.

10/4/2019

USPS.com® - USPS Tracking® Results

September 26, 2019, 9:40 am
Arrived at Post Office
DETROIT, MI 48207

September 26, 2019, 7:22 am
Arrived at USPS Destination Facility
DETROIT, MI 48242

September 25, 2019, 8:18 pm
Departed USPS Regional Origin Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

September 25, 2019, 7:51 pm
USPS in possession of item
ROSEDALE, MD 21237

September 25, 2019, 7:36 pm
Arrived at USPS Regional Origin 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

Track Another Package +

Tracking Number: EJ140718296US

Remove X

Scheduled Delivery by

FRIDAY

27

SEPTEMBER
2019 ⓘ

by
12:00pm ⓘ

Feedback

Out for Delivery

September 30, 2019 at 11:07 am
Out for Delivery
WASHINGTON, DC 20018

Get Updates ▾

Text & Email Updates



Proof of Delivery



Tracking History



September 30, 2019, 11:07 am
Out for Delivery

WASHINGTON, DC 20018

Your item is out for delivery on September 30, 2019 at 11:07 am in WASHINGTON, DC 20018.

September 29, 2019, 6:17 am

Departed USPS Regional Facility
WASHINGTON DC DISTRIBUTION CENTER

September 28, 2019, 9:14 am

Arrived at USPS Regional Facility
WASHINGTON DC DISTRIBUTION CENTER

September 28, 2019, 3:55 am

Departed USPS Regional Facility
NEW YORK NY DISTRIBUTION CENTER

September 26, 2019, 11:44 am

Forward Expired
NEW YORK, NY 10282

September 26, 2019, 11:31 am

Addressee Unknown
NEW YORK, NY 10007

September 26, 2019, 11:08 am

Forward Expired
NEW YORK, NY 10282

September 26, 2019, 11:08 am

Arrived at Post Office
NEW YORK, NY 10007

September 26, 2019, 4:15 am

Arrived at USPS Regional Destination Facility
NEW YORK NY DISTRIBUTION CENTER

Feedback

September 25, 2019, 8:21 pm
Departed USPS Regional Origin Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

September 25, 2019, 8:06 pm
USPS in possession of item
ROSEDALE, MD 21237

September 25, 2019, 7:36 pm
Arrived at USPS Regional Origin Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

Product Information



See Less ^

Feedback

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs

[Track Another Package +](#)

Tracking Number: EJ140718225US

[Remove X](#)

Scheduled Delivery by

FRIDAY

27

SEPTEMBER
2019 ⓘ

by

12:00pm ⓘ

Feedback

Alert

October 15, 2019 at 2:05 pm
Addressee Unknown
SAN DIMAS, CA 91773

Text & Email Updates 

Proof of Delivery 

Tracking History 

October 15, 2019, 2:05 pm
Addressee Unknown
SAN DIMAS, CA 91773

Your item was returned to the sender on October 15, 2019 at 2:05 pm in SAN DIMAS, CA 91773 because the addressee was not known at the delivery address noted on the package.

September 27, 2019, 5:15 am

Delivered
SAN DIMAS, CA 91773

September 27, 2019, 5:12 am

Arrived at Post Office
SAN DIMAS, CA 91773

September 27, 2019, 12:56 am

Departed USPS Regional Destination Facility
CITY OF INDUSTRY CA DISTRIBUTION CENTER

September 26, 2019, 3:29 pm

Arrived at USPS Regional Destination Facility
CITY OF INDUSTRY CA DISTRIBUTION CENTER

September 26, 2019, 9:20 am

Arrived at USPS Facility
EL MONTE, CA 91734

September 26, 2019, 7:51 am

Departed USPS Regional Destination Facility
CITY OF INDUSTRY CA DISTRIBUTION CENTER

September 26, 2019, 7:47 am

Arrived at USPS Regional Destination Facility
CITY OF INDUSTRY CA DISTRIBUTION CENTER

September 25, 2019, 8:33 pm

Departed USPS Regional Origin Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

Feedback

September 25, 2019, 7:57 pm
USPS in possession of item
ROSEDALE, MD 21237

September 25, 2019, 7:36 pm
Arrived at USPS Regional Origin 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

Feedback

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 20th 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:

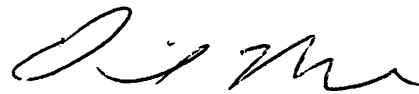
RARAN Corporation
1300 E. Lafayette, Suite 905
Detroit, MI 48207

By UPS:

Refco Public Commodity Pool, L.P.
c/o RefcoFundHoldings, LLC
One World Financial Center
200 Liberty Street -- Tower A
New York, NY 10281

By UPS:

Rent USA, Inc.
PO Box 10
San Dimas, CA 91733



David Misler