



Brinen & Associates, LLC

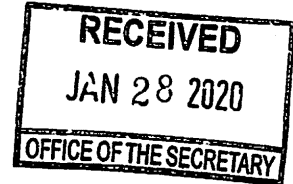
HARD COPY

Joshua D. Brinen
Attorney at Law
New York Office
jbrinen@brinenlaw.com

Member New York, New Jersey, Florida, California, Texas & Nevada Bar
LL.M. in Taxation

January 27, 2020

VIA FACSIMILE & OVERNIGHT MAIL



Office of the Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Facsimile: (703) 813-9793

Re: Petitioner Falcon Technologies, Supplemental Brief in Support of Application of Falcon Technologies, Inc for Review of Action taken by FINRA
In the Matter of Falcon Technologies, Inc., et al.
Securities and Exchange Commission,
SECURITIES EXCHANGE ACT OF 1934
Release No. 87472 / November 5, 2019
Admin. Proc. File No. 3-19575
FINRA, Case No. CAS-65999-D4D0V6
Our File No.: Falcon 11.FINRA

To the Members of the Commission:

My firm represents the Petitioner, Falcon Technologies, Inc. ("Falcon") in the above-referenced matter before the Commission.

The Petitioner, Falcon filed an appeal for review of action taken by FINRA following its determination of September 4, 2019. FINRA, Case No. CAS-65999-D4D0V6.

Petitioner seeks a review of FINRA's refusal to approve: 1) a name change from Falcon Technologies, Inc. to Eco Growth Strategies Inc.; and 2) a symbol change to ECGS.

On December 3, 2019, Petitioner filed and served its Brief on the Commission and FINRA in support of its appeal for review of action taken by FINRA. On January 6, 2020, FINRA filed and served its Opposition Brief on the Commission and the Petitioner. On January 11, 2020, Petitioner filed and served its Reply Brief on the Commission and FINRA.

90 Broad Street, Tenth Floor
New York, New York 10004
Telephone: (212) 330-8151
Facsimile: (212) 227-0201

1700 Post Oak Boulevard
2 Boulevard Place, Suite 600
Houston, Texas 77056
Telephone: (281) 815-4368
Facsimile: (281) 241-4444

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On January 16, 2020, this firm as Petitioner's attorney of record received an electronic mail message entitled "OTC Corporate Actions" from Mr. Mike Kurkjian, FINRA, Market Operations stating that upon FINRA's consideration of Petitioner's submission for a symbol change to ECGS that this name change was now acceptable and approved of by FINRA. A copy of this electronic message is attached as **Exhibit A**.

Mr. Kurkjian made no representation or statement in his electronic mail message as to whether FINRA had reconsidered or reversed its original decision in refusing to approve Petitioner's name change from Falcon Technologies, Inc. to Eco Growth Strategies Inc.

This development transpired after Petitioner filed and served its Reply Brief on the Commission and FINRA on January 11, 2020.

Petitioner having the name Falcon Technologies, Inc., while using the symbol ECGS on the OTC Markets will undoubtedly cause unnecessary confusion in the minds of perspective investors. FINRA's action in the electronic correspondence of January 16, 2020, will not ensure the protection of investors, the public interest and not maintain fair and orderly markets. Instead it runs contrary to the spirit of FINRA Rule 6490.

This matter is brought to the Commission's attention as a material matter which the Commission should be made aware of before determining Petitioner Falcon's appeal of FINRA's determination of September 4, 2019.

Should you have any questions, please do not hesitate to contact me at the New York office or via electronic mail at jbrinen@brinenlaw.com.

Yours truly,

Brinen & Associates, LLC


Joshua D. Brinen

Enclosure

cc: FINRA
Client

JDB:mew

CERTIFICATE OF SERVICE

I hereby certify that on this day, I caused one facsimile original and one non-facsimile original of the foregoing Supplemental Brief in Support of Application of Falcon Technologies, Inc, for Review of Action Taken by FINRA, Case No. CAS-65999-D4D0V6, to be served on each of the parties listed below.

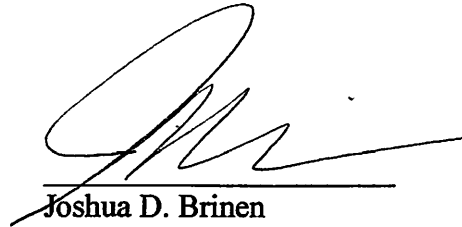
Office of the Secretary
Securities and Exchange Commission
1 00 F Street, NE
Washington, DC 20549-1090

Via Priority Mail
Via Facsimile: (202) 772-9324

Jante C. Turner
FINRA - Office of General Counsel
1735 K Street, NW
Washington, DC 20006

Via Priority Mail
Via Facsimile: (202) 728-8264

Dated: New York, New York
January 27, 2020



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Brinen & Associates, LLC
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New York, New York 10004
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(212) 227-0201 (Fax)
jbrinen@brinenlaw.com
Attorneys for Petitioner
Falcon Technologies, Inc.

Exhibit A

From: Joshua D. Brinen jbrinen@brinenlaw.com
Subject: Re: [CAS-68699] FINRA Second Lapsed Notice of Corporate Actions - Falcon Technologies, Inc. (FLCN)
CRM:0059000001865
Date: January 24, 2020 at 1:30 PM
To: OTC Corporate Actions otccorpactions@finra.org
Cc: Brian Begley bbegley@falconminerals.com, Bill Delgado djwilc@hotmail.com, service@brinenlaw.com



Mr. Kurkjian:

We are seeking review of that action by the Securities and Exchange Commission. We filed a petition, FINRA opposed, and we submitted our reply brief.

We will wait for the Securities and Exchange Commission's decision.

Should you have any questions, please do not hesitate to contact me at the below number or via electronic mail at jbrinen@brinenlaw.com.

Yours truly,

Joshua D. Brinen

On Jan 17, 2020, at 8:09 AM, OTC Corporate Actions <otccorpactions@finra.org> wrote:

Joshua,

Thank you for confirming. We've announced the symbol change on today's daily list. Effective Tuesday, the new symbol will be ECGS.

Please note that the CUSIP Service Bureau still has the current CUSIP (30609L105) suspended in preparation for the name change to Eco Growth Strategies Inc. Please reach out to them to have them reactivate the current CUSIP.

Please also note that Oregon also processed this name change to Eco Growth Strategies Inc. We'd ask that you undo this action with Oregon as this name change was not announced.

Thank you,

Mike Kurkjian
FINRA Market Operations
9509 Key West Avenue
Rockville, Maryland 20850
866.776.0800

From: Joshua D. Brinen <jbrinen@brinenlaw.com>
Sent: Thursday, January 16, 2020 4:01 PM
To: OTC Corporate Actions <otccorpactions@finra.org>
Cc: Brian Begley <bbegley@falconminerals.com>
Subject: Re: [CAS-68699] FINRA Second Lapsed Notice of Corporate Actions - Falcon Technologies, Inc. (FLCN)
CRM:0059000001865

EXTERNAL: Verify sender before opening attachments or links.

Mike-

Thank you. My client accepts.

Should you have any questions, please do not hesitate to contact me at the below number or via electronic mail at jbrinen@brinenlaw.com.

Yours truly,

Joshua D. Brinen

On Jan 16, 2020, at 3:31 PM, OTC Corporate Actions <otccorpactions@finra.org> wrote:

Joshua,

After further review, we will accept this documentation.

Please confirm the requested symbol ECGS is acceptable and we will make our announcement on tomorrow's daily list.

Thank you,

Mike Kurkjian
FINRA Market Operations
9509 Key West Avenue
Rockville, Maryland 20850
866.776.0800

From: Joshua D. Brinen <jbrinen@brinenlaw.com>
Sent: Thursday, January 16, 2020 12:07 PM
To: OTC Corporate Actions <otccorpactions@finra.org>
Cc: Brian Begley <bbegley@falconminerals.com>
Subject: Re: [CAS-68699] FINRA Second Lapsed Notice of Corporate Actions - Falcon Technologies, Inc. (FLCN) CRM:0059000001865

EXTERNAL: Verify sender before opening attachments or links.

Mike-

We have what was provided and the attached explanation.

It passed in our prior go around.

-Joshua Brinen

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Joshua D. Brinen Principal Attorney

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t: [\(212\) 330-8151](tel:(212)330-8151)

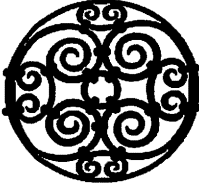
f: [\(212\) 227-0201](tel:(212)227-0201)

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<image003.jpg>



Joshua D. Brinen | Principal Attorney

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