

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-19646**

<p><b>In the Matter of</b></p> <p><b>United City Corp., <i>et al.</i></b></p> <p><b>Respondents.</b></p>
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**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 United City Corp. (“United City”) (CIK No. 745309) and against Worldwide Internet Marketing, Inc. (“Worldwide Internet Marketing”) (CIK No. 943657) (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 January 10, 2020, 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 the Respondents failed to answer or otherwise respond to

the OIP, the Division now seeks entry of an order finding respondents United City and Worldwide Internet Marketing 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 January 15, 2020, United City 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). United City’s answer to the OIP was due by Tuesday, January 28, 2020. However, United City has neither filed an answer nor made any other response to the OIP in this proceeding.

The Joyce Declaration also establishes that on January 11, 2020, service upon Worldwide Internet Marketing 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). Worldwide Internet Marketing’s answer to the OIP was due by Friday, January 24, 2020. Worldwide Internet Marketing 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 United City Corp. and Worldwide Internet Marketing, Inc.; and
- 3) revoke the registration of each class of their securities registered pursuant to Section 12 of the Exchange Act.

Dated: December 17, 2020

Respectfully submitted,

*Gina Joyce*

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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

**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 17th day of December, 2020, in the manner indicated below:

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

By UPS:

United City Corp.  
2700 West 15th Street  
Plano, Texas 75075

By UPS:

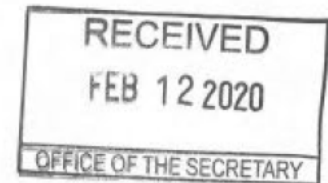
Worldwide Internet Marketing, Inc.  
14 East Main Street  
P.O. Box 309  
Los Gatos, CA 95030

*Gina Joyce*  
\_\_\_\_\_  
Gina Joyce

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**ADMINISTRATIVE PROCEEDING**  
**File No. 3-19646**

**In the Matter of**  
  
**United City 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”)<sup>1</sup> 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](http://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 United City Corp., CIK 745309 (“United City”), via Priority Mail Express, Tracking No. EJ 140717653 US, to the address shown on its most recent EDGAR filing at 2700 West 15th Street, Plano, Texas 75075. This address is taken from United City’s last filing with the Commission, which was a Form 8-K filed with the Commission on January 5, 1990. The USPS tracking system confirms that the package was delivered on January 15, 2020. *See* Exhibit 1 at pp. 1 - 2.

5. The Secretary mailed the OIP to respondent Worldwide Internet Marketing, Inc., CIK 943657 (“Worldwide Internet Marketing”), via Priority Mail Express, Tracking No. EJ 140717684 US, to the address shown on its most recent EDGAR filing at 14 East Main Street, P.O. Box 309, Los Gatos, CA 95030. This address is taken from

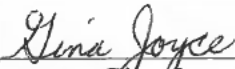
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<sup>1</sup>Each service package included the OIP, a letter from the Commission’s Secretary, and a letter from the Division offering discovery pursuant to Rule of Practice 230.

Worldwide Internet Marketing's last filing with the Commission, which was a Form 12b-25 filed with the Commission on June 12, 1998. The USPS tracking system confirms that delivery was attempted on January 11, 2020. The addressee was unknown. The package was returned. *See* Exhibit 1 at pp. 3 - 5.

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

Executed on February 12, 2020.

  
\_\_\_\_\_  
Gina Joyce

## Track Another Package +

**Tracking Number:** EJ140717653US

Remove X

Your item was delivered in or at the mailbox at 12:25 pm on January 15, 2020 in PLANO, TX 75075.

### **Delivered**

January 15, 2020 at 12:25 pm  
Delivered, In/At Mailbox  
PLANO, TX 75075

Feedback

**Get Updates** ∨

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**Text & Email Updates**



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**Proof of Delivery**



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**Tracking History**



**January 15, 2020, 12:25 pm**

Delivered, In/At Mailbox  
PLANO, TX 75075

Your item was delivered in or at the mailbox at 12:25 pm on January 15, 2020 in PLANO, TX 75075.



**January 11, 2020, 11:33 am**

Delivery Attempted - No Access to Delivery Location  
PLANO, TX 75093

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**January 11, 2020, 10:48 am**

Arrived at Post Office  
PLANO, TX 75075

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**January 11, 2020, 8:08 am**

Arrived at USPS Regional Facility  
COPPELL TX DISTRIBUTION CENTER

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**January 10, 2020, 10:54 pm**

Departed USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

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**January 10, 2020, 7:35 pm**

Arrived at USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

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Feedback

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**Product Information**



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**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:** EJ140717684US

Remove X

Your item was delivered at 11:14 am on January 13, 2020 in WASHINGTON, DC 20549 to SEC 20549 R26. The item was signed for by C HARRIS.

### **Delivered**

January 13, 2020 at 11:14 am  
Delivered  
WASHINGTON, DC 20549

**Get Updates** ∨

Feedback

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**Text & Email Updates**



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**Proof of Delivery**



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**Tracking History**



**January 13, 2020, 11:14 am**

Delivered

WASHINGTON, DC 20549

Your item was delivered at 11:14 am on January 13, 2020 in WASHINGTON, DC 20549 to SEC 20549 R26. The item was signed for by C HARRIS.

**January 13, 2020, 10:45 am**

Out for Delivery

WASHINGTON, DC 20018

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**January 13, 2020, 10:34 am**

Arrived at Post Office

WASHINGTON, DC 20018

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**January 13, 2020, 4:46 am**

Arrived at USPS Regional Facility

WASHINGTON DC DISTRIBUTION CENTER

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**January 12, 2020**

In Transit to Next Facility

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**January 11, 2020, 6:51 pm**

Arrived at USPS Regional Facility

OAKLAND CA DISTRIBUTION CENTER

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**January 11, 2020, 1:43 pm**

Arrived at USPS Facility

LOS GATOS, CA 95030

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**January 11, 2020, 12:37 pm**

Addressee Unknown

LOS GATOS, CA 95031

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**January 11, 2020, 11:02 am**

Delivery Attempted - No Access to Delivery Location

LOS GATOS, CA 95030

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**January 11, 2020, 10:18 am**

Arrived at Post Office

LOS GATOS, CA 95030

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Feedback

**January 11, 2020, 8:40 am**  
Arrived at USPS Regional Facility  
SAN JOSE CA DISTRIBUTION CENTER

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**January 10, 2020, 10:54 pm**  
Departed USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

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**January 10, 2020, 7:34 pm**  
Arrived at USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

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**Product Information**



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**See Less**

Feedback

## **Can't find what you're looking for?**

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

**FAQs**