

UNITED STATES OF AMERICA
BEFORE THE
SECURITIES EXCHANGE COMMISSION

In The Matter Of
Release No. 88549
No Borders, Inc.
Joseph Snyder

Petitioners,

PETITION FOR TERMINATION
OF SUSPENSION OF TRADING
IN THE SECURITIES OF
NO BORDERS, INC.

**PETITIONERS' NO BORDERS, INC AND JOSEPH SNYDER SWORN
PETITION FOR TERMINATION OF SUSPENSION OF TRADING OF SECURITIES**

No Borders, Inc., (hereinafter "NBDR" or the "Company"), and Joseph Snyder (hereinafter "SNYDER") in his capacity as President, CEO, and director of NBDR hereby files this Petition for Termination of Suspension of Trading of Securities (hereinafter "Petition"), pursuant to the Securities and Exchange Commission (hereinafter the "SEC") Rules of Practice Section 550.

In support thereof, NBDR and Snyder allege as follows:

1. NBDR, a Nevada corporation, specializes in the acquisition, creation, and scaling of commercial and consumer products.
2. SNYDER is the President, CEO, and director of NBDR.

3. No Borders Dental Resources Inc. is a subsidiary of NBDR and sells medical and dental products under the trade name of MediDent Supplies (hereinafter “MediDent”).

4. On April 6, 2020, the SEC pursuant to Section 12(k) of the Securities Exchange Act of 1934, as amended (hereinafter the “Exchange Act”), announced the temporary suspension of NBDR’s securities (hereinafter “Suspension Order”).

5. Pursuant to the Suspension Order, the suspension commenced at 9:30 a.m. EST on April 6, 2020 and terminates at 11:59 p.m. EST on April 20, 2020.

6. Petitioners NBDR and SNYDER will show that the Suspension Order is unnecessary in the interest of the public and is also unnecessary for the protection of investors.

7. Both Petitioners NBDR and SNYDER, individually and collectively, have suffered economic damages due to the trading suspension of NBDR’S securities and continue to be adversely affected.

8. The Suspension Order has damaged NBDR’S business, business opportunities, access to the capital markets, and reputation to its character which has created a presumption of fraudulent business activity by NBDR.

9. The Suspension Order has effectively eliminated the trading of NBDR’S securities which has caused the shareholders of NBDR to lose the cost of their investment.

10. NBDR’S securities were previously quoted on the OTCMarkets Pink Open Market platform under the trading symbol “NBDR”.

11. In his capacity as an officer and director of NBDR, SNYDER owes the shareholders of NBDR a fiduciary duty, which includes the duty to provide compliance for the trading market of NBDR'S securities.

STATEMENT OF FACTS ON WHICH PETITIONER RELIES

12. NBDR was incorporated on May 28, 1999 and is located at 18716 E. Old Beau Trail, Queen Creek, AZ 85142.

13. MediDent is a provider of equipment and supplies to medical and dental professionals. MediDent sells its products throughout the U.S. and is the successor to a business whose assets and supplier relationships NBDR acquired in 2018. The prior business had been operating for approximately 5 years.

14. Beginning sometime in January 2020, the U.S. took notice of a rapidly contagious virus that was entering or had entered into the U.S. The virus is called coronavirus (hereinafter "Coronavirus" or "COVID-19") and the resulting infection is called COVID-19. COVID-19 may become fatal to individuals.

15. The Coronavirus began in China and upon entering the U.S. began to quickly spread in an uncontrollable manner. In the U.S. there are over 500,000 confirmed cases and over 20,000 deaths from COVID-19. These numbers continue to increase at this time. It is estimated that the Coronavirus may kill between 60,000 to 200,000 people in the U.S. The spread of the Coronavirus has not yet slowed in the U.S. population.

16. The U.S. economy is greatly suffering, non-essential businesses have been forced to close and unemployment is exploding. Most states have implemented mandatory stay-at-home orders, imposed social distancing requirements, and have just about closed all schools.

17. The uncontrollable rapid growth of the Coronavirus has caused severe medical products shortages including but not limited to: masks, gloves, hand sanitizers, personal protective equipment (“PPE”), tests to confirm the Coronavirus and rapid serological tests to confirm antibodies, sample collection tests, and temporary PPE (collectively, the “Medical Products”).

18. The Federal and state governments, and medical and healthcare industries either cannot find, nor can they purchase enough of the Medical Products to protect their employees and those they serve. The State of California on April 7, 2020, announced it will spend \$1 billion dollars to purchase 200 million masks, subject to availability.

19. Additionally, the public is living in fear of Coronavirus and is attempting to purchase the Medical Products which has compounded the magnitude of the shortage of Medical Products.

20. In early March, 2020, MediDent approached their sourcing agents in the Far East to purchase the Medical Products that had become subject to the shortages in the U.S. China which was the original epicenter of the Coronavirus had already begun, through their manufacturing industries, to increase the manufacturing of the Medical Products.

21. MediDent used new and pre-existing foreign business relationships to locate, source, and purchase the Medical Products. Most of the various Medical Products do not require any new or additional FDA approval for manufacturing and sale.

22. Prior to March 16, 2020, Liming-Bio had submitted an Emergency Use Authorization application (hereinafter "EUA") to the FDA for the manufacturing of their ANTIBODY TEST KITS and had completed the notification process as required by the FDA's validation review. Liming-Bio was added to the FDA's approved list of manufacturers of ANTIBODY TEST KITS.

23. On March 16, 2020, based upon the severe shortage of a specialized test kit, the Rapid Serological COVID-19 test kit (hereinafter "ANTIBODY TEST KITS") MediDent, contracted with a sourcing agent in the Far East to purchase Liming-Bio's ANTIBODY TEST KITS to sell them in the U.S. in accordance with the FDA guidelines that existed at the time of purchase.

24. All ANTIBODY TEST KITS sold by MediDent were manufactured by Liming-Bio and have been sold in compliance with the EUA filed by Liming-Bio.

25. On February 29, 2020, the FDA issued guidance for submitting EUA notifications and requests for ANTIBODY TEST KITS and specimen collection kits.

26. Pursuant to the February 29, 2020, FDA guidance, the following Q/A was listed on the FDA's FAQ document regarding At Home Test and Specimen collection kits:

Q: Can I offer my test for home use and/or self-collection under the Policy Diagnostic Tests for Coronavirus Disease-2019?

A: As noted in the guidance, the policies outlined in the Policy for Diagnostic Tests for Coronavirus Disease-2019 do not apply to at-home testing, including self-collection of samples to be sent to a clinical laboratory.

FDA encourages developers to discuss their validation of home use and/or self-collection tests with us early in their development process.”

27. On March 16, 2020, the FDA issued guidance which superseded the February 29, 2020 guidance. This March 16, 2020, guidance allowed manufactures to distribute tests before receiving an EUA for a reasonable period of time (of approximately 15 days) after the manufacturer had internally validated the test. Furthermore, Section 5.D. of the new guidance stated: “This policy does not apply to at home testing.”

28. On March 16, 2020, NBDR issued a press release that fully complied with the March 16, 2020, FDA guidance. The press release was titled: “No Borders, Inc. (Ticker: NBDR) Subsidiary MediDent Supplies Launches Stay at Home Covid-19 Home Specimen Collection Kit Nationwide.” This press release does not contain a false or misleading statement.

29. On March 20, 2020, NBDR issued press release that fully complied with the March 16, 2020, FDA guidance. The press release was titled: “No Borders, Inc. (ticker: NBDR) Subsidiary MediDent Supplies Begins Air Freight Shipments of Medical Supplies into the USA”. This press release does not contain a false or misleading statement.

30. On March 23, 2020, NBDR issued a press release that fully complied with the March 16, 2020, FDA guidance. The press release was titled: “No Borders, Inc. (Ticker: NBDR) Subsidiary MediDent Supplies Announces New Stay At Home 15 minute Covid-19 Blood Tests.” This press release does not contain a false or misleading statement.

31. On March 26, 2020, due to the rapid mounting confusion over the filing and issuance of EUA’s, the myriad of policy changes that were contemplated by the FDA, and the

dire need for Medical Products; NBDR retained specialized FDA legal counsel, Benjamin L. England & Associates, LLC.

32. On April 3, 2020, NBDR issued a press release that fully complied with the March 16, 2020, FDA guidance. The press release was titled: “No Borders, Inc. (ticker: NBDR) Has Begun Receiving and Shipping of the 15 Minute Covid-19 Serological Tests in the USA”. This press release did not contain a false or misleading statement.

33. After the March 23, 2020, NBDR press release but before the April 3, 2020 press release the FDA again issued guidance that ANTIBODY TEST KITS could not be used for home use and the “at home” words were not included in the April 3, 2020, NBDR press release.

34. The March 25, 2020; March 26, 2020; March 26, 2020; and April 3, 2020, NBDR press releases did not contain false or misleading statements.

35. On April 2, 2013, the SEC issued a press release titled: “SEC Says Social Media OK for Company Announcements if Investors are Alerted”. NBDR has repeatedly notified their investors that it would use Twitter, its website, and YouTube to inform its investors. NBDR has consistently disseminated information to its investors through these social media channels during the past three years.

36. In keeping with its standard policy of using social media to inform investors and since March 11, 2020, NBDR and Snyder have issued Tweets disseminating information that referenced the information contained in NBDR’s press releases. Additionally, NBDR has continued to update its website to provide information. Neither the social media channels used by NBDR or Snyder nor NBDR’s website contain a false or misleading statement.

37. NBDR is current and has been current on all of its filings with the OTCMarkets since current management took over control of NBDR and has qualified for a Current Information listing for many years. The current filings include: two Annual reports and subsequent Quarterly Reports; two Annual Disclosure Statements and subsequent Reports; current Attorney Letter covering all relevant information for non-audited companies; and the NBDR Company Profile has been verified through OTCIQ. There are no false or misleading statements contained in an OTCMarkets filings.

38. NBDR has never hired, retained, and has not ever had any understanding with an individual or entity to promote, or tout the Company or its business to the public.

39. On April 1, 2020, the SEC contacted NBDR and gave NBDR a few hours to gather documents, deliver the documents and have a conference call with SEC lawyers. NBDR did its best to comply in a very short time frame and was unable to adequately and properly prepare for the conference call. NBDR and Snyder are upset and dismayed at the SEC over the inadequate time that NBDR was given to allow for the preparation of a full response to such an important inquiry with such far-reaching consequences to NBDR, Snyder, and shareholders. NBDR and Snyder were not allowed to reschedule the conference call in order to prepare a full response to a fully prepared SEC informal inquiry. Based upon the potential negative impact of the SEC's allegations and the immediacy of the requested response, this was a classic "Deer in headlights" situation for NBDR and Snyder. NBDR and Snyder were not provided with any document requests list or an opportunity to furnish follow up documentation or answer questions to any specific areas or items of interest by the SEC after the impromptu conference call.

SUSPENSION IS NOT NECESSARY IN THE PUBLIC INTEREST

Petitioner incorporates paragraphs 1 through 39.

40. The Suspension Order is unwarranted and not necessary because it was improperly based upon:

- A. Incomplete understanding of the FDA Policy Guidelines.
- B. Misinterpretations of the FDA Policy Guidelines and their applications to the MediDent business of NBDR.
- C. Misapplication of the FDA Policy Guidelines to the MediDent business of NBDR.
- D. Failure to acknowledge the prior use of social media communications by NBDR and Snyder to NBDR investors as previously and consistently used social media channels of information dissemination.
- E. Misunderstanding of NBDR's website.
- F. Incomplete analysis of the submissions by NBDR to the OTCMarkets.
- G. The SEC's incomplete understanding of the policies provided by the FDA for the issuance of EUA's, the manufacturing and distribution of ANTIBODY TEST KITS which is allowed prior to the issuance of an EUA.
- H. The SEC's retroactive mistaken application of subsequent policy decisions by the FDA that stated ANTIBODY TEST KITS and collection specimen kits could not be used at home to earlier NBDR press releases which were compliant with the then existing FDA policy guidelines. This updated policy by the FDA was issued after the March 23, 2020 press release by

NBDR. At the time of the March 16, March 20, and March 23 press releases the FDA's March 16, 2020, policy was the controlling policy and it did not prohibit at home use of ANTIBODY TEST KITS.

41. The Suspension Order is not necessary and not in the public interest because:
 - A. NBDR has not acted in a fraudulent, deceitful, or manipulative manner.
 - B. Each NBDR press release was based upon facts that were true at the time the statements were made.
 - C. NBDR worked with U.S. Congressman Kevin McCarthy's office and U.S. Congressman Paul Gosar's office in NBDR's dealings with the U.S. Customs and Border Patrol for shipment clearing and release as well as being introduced to contacts with FEMA/FDA by said congressional offices in regard to EUA filings and the distribution of the Medical Products and proper public disclosure.
 - D. Due to the Suspension Order a significant amount of Medical Products will not be brought into the U.S. This loss of Medical Products will increase the shortage of Medical Products and may substantially increase the time before Medical Products are available to the public.
 - E. Neither NBDR, investors, or the general public have been enriched.
 - F. There has been no promotion or touting of NBDR's stock.
 - G. The damage to the reputation of NBDR has virtually cut-off all access to the capital markets. The Reg A+ offering that NBDR invested significant time and capital to have it qualified in 2019 is not viable due to the Suspension Order. The Suspension Order has severely affected NBDR's

efforts to raise investment capital which affects the needed working capital to procure the Medical Products before they are sold in the U.S.

- H. The Suspension Order has caused those companies that were doing business with NBDR to lose potential business which in turn magnifies the public's need for Medical Products.
- I. The Suspension Order may cause NBDR to go out of business causing the loss of jobs for employees during a time of deep economic uncertainty due to the Coronavirus.

How sadly ironic that the misapplication of the FDA's guidance on the Coronavirus may cause NBDR's employees to lose their jobs when NBDR was working to procure needed Medical Products to help American's through the Coronavirus pandemic.

- J. Since the time that Snyder took control of NBDR, neither NBDR nor Snyder has ever had any history of any regulatory problems or violations.
- K. Any concern on the part of the SEC should have been and may still be discussed, clarified, and resolved between the parties.
- L. The damage to NBDR, its employees, and the public outweighs the unfounded premises and assumptions that the SEC used to issue the Suspension Order.
- M. There is not a valid legal reason to prevent NBDR's shares from trading based upon (1) social media posts since March 11, 2020; (2) press releases since March 16, 2020; (3) NBDR's website since March 24, 2020; and (4) submissions to the OTCMarkets Group, Inc. since March 25, 2020.

THE SUSPENSION IS NOT NECESSARY FOR THE PROTECTION OF INVESTORS

Petitioner incorporates paragraphs 1 through 41.

42. All past, current, and prospective investors have access to all public information of NBDR and its businesses.

43. NBDR is current with all filings as required by the OTCMarkets.

44. NBDR has not been involved in any promotion or touting of its stock.

45. No officer, director, or any affiliate of NBDR since current management took control of NBDR in 2018 has ever sold a share of NBDR's securities.

46. NBDR or Snyder has not undertaken or acted in any fraudulent, deceitful, or manipulative manner regarding the business of NBDR or the trading of NBDR's securities.

47. There are times when based upon world and national events that situations arise that may become ripe for unscrupulous behavior to take advantage or attempt to profit in an illegal manner at the expense of the unknowing public; however, such has not been the nature, behavior, and has not been the actions of NBDR and Snyder.

48. To the contrary, NBDR and Snyder worked with the offices of two U.S. Congressmen (Reps. McCarthy and Gosar), hired a law firm in Washington D.C. with specialized expertise in working with the FDA, and made timely disclosure of important NBDR information.

49. NBDR has acted as a transparent and fully compliant public company.

WHEREFORE, Petitioners respectfully request that the Commission enters an order terminating the suspension of trading in the securities of No Borders, Inc. since the suspension is not necessary in the public interest or for the protection of investors. Alternatively, Petitioners

request that the SEC state with specificity the information which caused the issuance of the Suspension Order so that Petitioners can properly reply pursuant to SEC Rule 550.

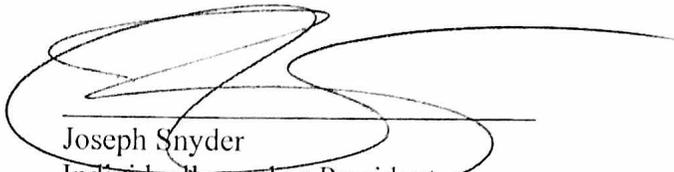
Respectfully submitted,

By: 
Rowland W. Day II
California Bar No. 110433
1 Hampshire Court
Newport Beach, CA 92660
Tel. 949-350-6500
rday@rdaylaw.com

PETITIONER JOSEPH SNYDER'S SWORN STATEMENT

I, Joseph Snyder, individually, and as President and Chief Executive Officer of No Borders, Inc., being duly sworn, state that I have read the foregoing Petition for Termination of Suspension of Trading in the Securities of No Borders, Inc., and have personal knowledge of the facts contained therein and that such facts are true and correct.

Date: April 13, 2020



Joseph Snyder
Individually, and as President
and Chief Executive Officer
NO BORDERS, INC.

STATE OF CALIFORNIA

COUNTY OF _____

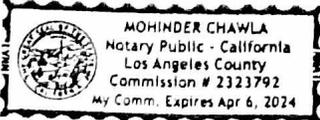
I HEREBY CERTIFY, that on this day, before me, an officer duly authorized I, the State and country aforesaid, to take acknowledgments, personally appeared _____,
Who [] is personally known to me OR [] has produced _____
as identification and who did take an oath.

SWORN TO and subscribed before this __ day of April, 2020.

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California, County of KERN
Subscribed and sworn to (or affirmed) before me
on this 13th day of APRIL, 2020,
by JOSEPH ALLEN SNYDER,
proved to me on the basis of satisfactory evidence to
be the person(s) who appeared before me.
Signature: Mohinder Chawla

Printed/Typed Name: MOHINDER CHAWLA
Notary Public-State of California
Commission Number: 2323792
My Commission Expires: April 6/2024



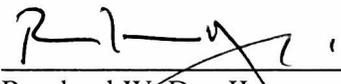
CERTIFICATE OF SERVICE

I, **HEREBY CERTIFY** that a true and correct copy of the foregoing was filed on April 13, 2020 by electronic delivery to apfilings@sec.gov.

Pursuant to Release No. 88415, dated March 18, 2020, Petitioner and Petitioner's legal counsel, Rowland W. Day II, agree to waive all paper service of all opinions and orders, and agree to accept service of all opinions and orders by email delivery. Their email addresses are:

jsnyder@nbdr.co and rday@rdaylaw.com

By:



Rowland W. Day II
California Bar No. 110433
Email: rday@rdaylaw.com