

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 89762

ADMINISTRATIVE PROCEEDING
File No. 3-19960

In the Matter of

Token Communities Ltd.,

Respondent.

**DIVISION OF ENFORCEMENT'S
RESPONSE IN OPPOSITION TO
RESPONDENT'S MOTIONS TO
DISMISS**

The Division of Enforcement (“Division”), by counsel, hereby submits this response in opposition to respondent Token Communities Ltd.’s Notice of Appearance and Motion. The respondent argues that this proceeding should be dismissed because of (1) purported “inaccuracies” contained in the Order Instituting Proceeding (“OIP”) and (2) improper service. On September 19, 2020, the Division filed an amended OIP correcting the “inaccuracies,” and thus rendering the respondent’s initial claim moot. In addition, under Commission precedent and its Rules of Practice, improper service is not grounds for dismissal. Accordingly, the respondent’s motions should be denied.

ARGUMENT

On or about September 11, 2020, the respondent filed a combined notice of appearance and motion. The filing was served on the Division of Enforcement on September 14, 2020. The respondent argues that the OIP should be dismissed because it inaccurately describes its corporate status and names the wrong location for its office. On September 18, 2020, the Division filed an amended OIP which accurately describes the respondent as a good standing Delaware corporation located in Flushing, NY. Notwithstanding, the inaccuracies in the OIP do not affect the Division’s legal position as to Token Communities, Ltd. Respondent is over one year delinquent in its periodic filings having not filed any periodic reports since it filed a Form 10-K for the period ended June 30, 2018.

The respondent also argues for dismissal based on improper service. However, improper service is not a grounds for dismissal. Where it is determined that service is improper, the Division has to attempt other methods of service. *See BDO China Dahua CPA Co. et al.*, Securities Exchange Act 1934 Rel. No. 3627 (February 6, 2015) (Commission denied issuer’s motion for summary disposition noting that dismissal is not an available remedy for improper service under the Commission’s Rules of Practice.). The Division is in the process of serving the

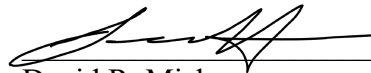
amended OIP and all other prior documents on the respondent at the correct address in accordance with the Commission's Rules of Practice.

Conclusion

For the reasons set forth above, the Division respectfully requests that the Commission deny the motions.

Dated: September 21, 2020

Respectfully submitted,



David R. Mislér (202) 551-2210

Sandhya C. Harris (202) 551-4882

Securities and Exchange Commission

100 F Street, N.E.

Washington, D.C. 20549-6010

COUNSEL FOR
DIVISION OF ENFORCEMENT

CERTIFICATE OF SERVICE

I hereby certify that true copies of the Division of Enforcement's Response in Opposition to Respondent's Motion to Dismiss were caused to be served on the following on September 21, 2020, in the manner indicated below:

By Email:

apfilings@sec.gov


By First Class Mail:

Token Communities Ltd.
136-20 38th Avenue, Suite 9C
Flushing, NY 11354

By Email.

Jeffery M. Stein, Esq.
jstein@jmslg.com

(Counsel for Respondent)


Sandhya C. Harris