

UNITES STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934  
Release No. 89980 / September 24, 2020

ADMINISTRATIVE PROCEEDING  
File No. 3-20055

In the Matter of

EMMANUEL  
KOUYOUMDJIAN  
a/k/a "MANNY K,"

Respondent.

\_\_\_\_\_ /

**ANSWER TO ORDER INSTITUTING ADMINISTRATIVE PROCEEDINGS**

I.

COME NOW, the Respondent, EMMANUEL KOUYOUMDJIAN, by and through undersigned counsel, and herewith Answers the Order Instituting Administrative Proceedings as follows:

II.

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted as to entry of the final judgment by consent. Denied as to the veracity of the Commission's allegations.
6. Admitted that the Commission's Complaint contains said allegations. Denied as to the veracity thereof.

III.

A. The Respondent denies any allegations of the Securities and Exchange Act.

B. The Respondent denies any allegations of the Securities and Exchange Act and therefore avers that no remedial action is appropriate.

WHEREFORE, having answered the Order Instituting Administrative Proceedings, the Respondent, EMMANUEL KOUYOUMDJIAN, prays the same be dismissed, with prejudice and for its costs.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via e-mail and regular U.S. Mail to all parties listed below on this 20<sup>th</sup> of October 2020.

THE LAW FIRM OF GARY S. OSTROW, P.A.  
Intracoastal Building  
3000 N.E. 30th Place, Suite 302  
Fort Lauderdale, Florida 33306  
Telephone: (954) 566-4033  
Facsimile: (954) 566-1021  
Email: [gostrow2@gmail.com](mailto:gostrow2@gmail.com)  
By: /s/ Gary S. Ostrow  
GARY S. OSTROW  
Florida Bar No.: 354694

**Service List:**

Eduardo Aleman  
Deputy Secretary  
Office of the Secretary  
U.S. Securities and Exchange Commission  
100 F. Street NE, Mail Stop 1090  
Washington, DC 20549  
Tel: 202-551-5410  
Fax: 703-813-9793  
Email: APFilings@sec.gov

Philip A. Fortino, Esq.  
New York Regional Office  
Securities and Exchange Commission  
200 Vessey Street, Suite 400  
New York, NY 10281