

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

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-21264**

**In the Matter of**

**PETER JOSEPH POLINSKI TRUST,**

**Respondent.**

**THE DIVISION OF ENFORCEMENT'S**  
**MOTION FOR SUMMARY DISPOSITION AND FOR REMEDIAL SANCTIONS**

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The Division of Enforcement ( “Division”), pursuant to the Securities and Exchange Commission’s (“Commission”) Rules of Practice (“Rules”) 154(a) [17 C.F.R. § 201.154(a)] and 250(b) [17 C.F.R. § 201.250(b)], respectfully moves the Commission for summary disposition on all claims—as there is no genuine issue with regard to any material fact and the Division is entitled to summary disposition as a matter of law—and for entry of an order revoking, under Section 17A(c)(3) of the Securities Exchange Act of 1934 (“Exchange Act”) [15 U.S.C. § 78q-1(c)(3)], Respondent Peter Joseph Polinski Trust’s (“Respondent” or “Polinski Trust”) registration as a transfer agent.

## **I. INTRODUCTION**

The Commission’s Order Instituting Proceedings (“OIP”) alleges that Polinski Trust filed an inaccurate Form TA-1 when registering as a transfer agent by providing the address of a post office as the place where transfer agent activities would be performed; failed to amend its registration form to provide an accurate address; and failed to file required annual reports. The OIP alleges that Polinski Trust thereby violated Section 17A(c)(2) of the Exchange Act [15 U.S.C. § 78q-1(c)(2)] and Rules 17Ac2-1(a) [17 C.F.R. § 240.17Ac2-1(a)] and 17Ac2-2(a)(1) [17 C.F.R. § 240.17Ac2-2(a)] thereunder; and Section 17A(d)(1) of the Exchange Act [15 U.S.C. § 78q-1(d)(1)]. Polinski Trust later filed an answer that does not dispute the Division’s allegations set out in the OIP, and instead asserts that Polinski Trust did not commit the alleged violations with any intention of breaking the law. In part because scienter is not an element of the Division’s claims, summary disposition is appropriate. The Commission should revoke Polinski Trust’s registration as a transfer agent based on the undisputed facts.

## **II. RELEVANT PROCEDURAL HISTORY**

### **A. The Commission's OIP**

On December 27, 2022, the Commission issued the OIP, in which the Division alleges that Polinski Trust filed an inaccurate Form TA-1 when registering as a transfer agent by providing the address of a post office as the place where transfer agent activities would be performed; failed to amend its registration form to provide an accurate address; and failed to file required annual reports. The OIP alleges that Polinski Trust thereby violated Section 17A(c)(2) of the Exchange Act and Rules 17Ac2-1(a) and 17Ac2-2(a)(1) thereunder; and Section 17A(d)(1) of the Exchange Act. None of these provisions requires any showing of intent or scienter, as the plain text of the provisions shows. 15 U.S.C. § 78q1(c)(2); 17 C.F.R. § 240.17Ac2-1(a); 17 C.F.R. § 240.17Ac2-2(a); 15 U.S.C. § 78q-1(d)(1).

### **B. Service of the OIP and Discovery**

On December 28, 2022, the Division sent a discovery letter to Polinski Trust, explaining Respondent's right to inspect documents related to the instant matter in the Division's possession. Declaration to Assist with Record of Service ("Declaration"), filed on February 6, 2023, in eFAP at ¶ 6.

Copies of the OIP and Secretary's letter were served on Respondent on January 11, 2023, at 1:42 p.m., at [REDACTED], which is the address Polinski Trust provided in its publicly filed registration form. *Id.* at ¶ 9.

On February 6, 2023, the Division emailed a copy of the Declaration to Peter Polinski (“Polinski”), who is listed on Polinski Trust’s registration form as its “Treasurer.”<sup>1</sup> The same day, Polinski responded to the Division’s email, indicating he was going to send out “the other 2 copies i missed.” *See* Attachment 1 (Feb. 6 email).

### **C. Polinski Trust’s Answer**

On February 8, 2023 two days after Polinski initially responded to the Division’s email, the Division received another email from Polinski to which were attached two .pdfs each labelled “pjresponsetosec” and titled “Answer to Allegations.”<sup>2</sup> The .pdfs appear to be two copies of the same document.<sup>3</sup> The document bears the handwritten signature of “Peter Polinski R.H. of Polinski” and contains information and averments in direct response to the Division’s allegations. *See* Attachment 3 (Respondent’s Answer).

Polinski Trust’s “pjresponsetosec” document also contains a certificate of service, bearing a handwritten signature of “Peter Joseph, Royal House of Polinski,” which twice describes the document as an “Answer.” *See* Attachment 3 (Respondent’s Answer). As such, the Division recognizes, and treats, the “pjresponsetosec” document as Polinski Trust’s Answer to the allegations set out in the OIP.

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<sup>1</sup> The February 6 email is submitted as Attachment 1.

<sup>2</sup> The February 8 email is submitted as Attachment 2. The message in Polinski’s February 8 email transmission was: “eFap will not let me upload the file.....i keep getting this error message.... ADF\_FACES-60097:For more information, please see the server's error log for an entry beginning with: ADF\_FACES-60096:Server Exception during PPR, #8 will try again tomorrow this email was written with good faith and honor.”

<sup>3</sup> A copy of “pjresponsetosec” is submitted as Attachment 3 (“(Respondent’s Answer”).

In its Answer, Polinski Trust does not dispute the Division's allegations. Instead, Respondent merely declares: "Violations of not keeping an updated TA-1 with proper address and not updating my TA-2 for the years 2019, 2020, 2021, forgetting to update the phone number within 60 days are in fact not violated on purpose or with any ill intent." Attachment 3 (Respondent's Answer) at 1. Further, Respondent states:

When it comes to these violations let it be known that I have not committed any securities fraud, no estate embezzlement, also no banking fraud. I simply have been so busy with spiritually teaching, taking care of my grandmothers health and their bills, also doing court work all pro bona [*sic*] that I forgot that I have to keep all records up to date in a professional and timely manner within the laws and rules of the Commission.

*Id.* Polinski Trust acknowledges and admits the violations alleged in the OIP and simply characterizes them as potentially negligent but without intent to violate the law. *See* Attachment 3 (Respondent's Answer).

### **III. STATEMENT OF FACTS: THE OIP'S UNDISPUTED ALLEGATIONS**

The legal provisions alleged in the OIP require no shower of intent or scienter for the Division to prove a violation and as stated above, Respondent's sole substantive response to the Division's allegations is that the violations were unintentional. Therefore, the Division's allegations in the OIP should be treated as admitted. Rule 220(c) [17 C.F.R. § 201.220(c)] ("Any allegation not denied shall be deemed admitted."); *In re Anthony C. Zufelt*, SEC Release No. 1374, 2019 WL 1761611, at \*2 (ALJ Apr. 22, 2019)(citing Rule 220(c)). The undisputed facts alleged in the OIP are recited below.

**A. Polinski Trust Filed an Inaccurate Form TA-1**

Transfer agents must register with the Commission by filing a Form TA-1 and complete the form in accordance with its instructions. *See* Section 17A(c)(2) of the Exchange Act and Rule 17Ac2-1(a) thereunder.

On June 6, 2019, Polinski Trust filed a Form TA-1 to register as a transfer agent. OIP ¶ 4. The registration became effective on June 26, 2019, *id.*; however, Polinski Trust did not complete the form according to the instructions. *Id.* ¶ 5. Among other requirements, Polinski Trust was instructed to provide its principal office address, defined on the form as the address “where transfer agent activities are, or will be, performed.” *Id.* In addition, the instructions specify that a Post Office box is not acceptable as a principal office address. *Id.* However, on its Form TA-1, Polinski Trust listed its principal office address as [REDACTED], [REDACTED] which is the address of a United States Post Office. *Id.* By filing a Form TA-1 that included a misleading address for its principal office, Polinski Trust violated Section 17A(c)(2) of the Exchange Act and Rule 17Ac2-1(a) thereunder. OIP ¶ 10.

**B. Polinski Trust Failed to Amend Form TA-1**

As required under Rule 17Ac2-1(c), if any information reported on Form TA-1 becomes inaccurate, misleading, or incomplete, the transfer agent must correct the information by filing an amendment within 60 days of the date on which the information became inaccurate, misleading, or incomplete. *See* Rule 17Ac2-1(c).

The address for Polinski Trust’s principal office provided on Form TA-1 was misleading when the form was filed on June 6, 2019, meaning that the Polinski Trust was required to file an amendment to the Form TA-1 by June 19, 2020. OIP ¶ 7. Polinski Trust never filed an amendment



to the Form TA-1. *Id.* By failing to correct its principal office address on Form TA-1 by filing an amendment within 60 days following the date on which the information became inaccurate, misleading, or incomplete, Polinski Trust violated Section 17A(c)(2) of the Exchange Act and Rule 17Ac2-1(c) thereunder. OIP ¶ 11.

**C. Polinski Trust Failed to File Required Annual Reports**

Transfer agents registered by December 31 of any given year are required to file an annual report summarizing the securities transactions they facilitated and other information related to their services as a transfer agent and are required to do so on Form TA-2 by March 31 of the following year. *See* 17 C.F.R. § 240.17Ac2-2(a).

Polinski Trust did not file annual reports for 2019, 2020, or 2021 by March 31 of the subsequent years, and indeed has not done so to date. OIP ¶ 8. By failing to file the required annual reports, Polinski Trust violated Section 17A(c)(2) of the Exchange Act and Rule 17Ac2-2(a)(1) thereunder. OIP ¶ 12.

**D. Polinski Trust Contravened the Commission’s Rules and Regulations**

By violating the regulations promulgated by the Commission, Polinski Trust violated Section 17A(d)(1) of the Exchange Act, which prohibits registered transfer agents from engaging in any activity in contravention of rules and regulations prescribed by the Commission in their capacity as transfer agents. OIP ¶ 13.

**E. The Polinski Trust Received Notice of Its Violations**

On September 1, 2022, the Division sent a Wells notice to Polinski Trust via email to the email address listed on Polinski Trust’s Form TA-1, and by hard copy via certified mail, return receipt requested, to the principal address on Polinski Trust’s Form TA-1. OIP ¶ 9. The Wells

notice informed Polinski Trust that the Division staff had made a preliminary determination to recommend to the Commission that it authorize an enforcement action against Polinski Trust for violating federal securities laws. *Id.* Division staff did not receive an error message indicating that the email could not be delivered, and the mailed copy was delivered. *Id.*

#### **IV. THERE CAN BE NO GENUINE FACTUAL DISPUTE THAT RESPONDENT VIOLATED THE RELEVANT PROVISIONS “WILLFULLY”**

Summary disposition should be granted in the Division’s favor if “the undisputed pleaded facts . . . show that there is no genuine issue with regard to any material fact and that the movant is entitled to summary disposition as a matter of law.” Rule 250(b); *In re Legacyxchange, Inc.*, Exchange Act Release No. 34-96401, 2022 WL 17345980, at \*1 (Nov. 29, 2022). As described above in Section III., there is no genuine dispute that Polinski Trust violated the securities laws and regulations alleged in the OIP. In addition, the undisputed pleaded facts in the OIP and Respondent’s Answer show that there is no genuine factual issue as to whether Respondent acted willfully. Polinski Trust’s conclusory denial that it did not act with the intention to violate the law does not mean that it did not act “willfully” in this context—a matter on which there is no genuine factual dispute. Therefore, summary disposition of these proceedings is appropriate.

##### **A. Exchange Act Section 15 Permits a Transfer Agent’s Registration To Be Revoked Only If the Transfer Agent Commits a “Willful” Violation**

The Commission may revoke a transfer agent’s registration if it “finds, on the record after notice and opportunity for hearing, that . . . revocation is in the public interest and that such transfer agent . . . has committed or omitted any act, or is subject to an order or finding, enumerated in subparagraph (A), (D), (E), (H), or (G) of paragraph (4) of section 78o(b) of this title.” Exchange Act Section 17A(c)(3)(A) [15 U.S.C. § 78q-1(c)(3)(A)]. In turn, Exchange Act Section

15(b)(4)(D) specifies a “willful” violation of any provision of the Exchange Act or the rules and regulations thereunder as one basis for such a revocation. 15 U.S.C. § 78o(b)(4)(D).

**B. The Definition of “Willful”**

As Exchange Act Section 15 does not define “willful,” the Commission should look to judicial interpretation of the term. The seminal case on this issue is *Wonsover v. SEC*, 205 F.3d 408 (D.C. Cir. 2000). In that case, the Commission affirmed an administrative law judge’s conclusion that *Wonsover* violated provisions of the Securities Act of 1933 and that the violations were willful under Exchange Act Section 15(b)(4). *Id* at 412. *Wonsover* appealed, unsuccessfully arguing that the Commission’s willfulness standard was incorrect. *Id* at 413. In affirming the Commission’s standard, the D.C. Circuit found that “‘willfully’ simply requires the intentional doing of the wrongful acts—no knowledge of the rule or regulation is required.”<sup>4</sup> *Id* at 414. The appellate court elaborated that “[g]enerally, it means no more than that the person charged with the duty knows what he is doing. It does not mean that, in addition, he must suppose that he is breaking the law.” *Id* at 415.

**C. It Is Undisputed that Polinski Trust Knew What It Was Doing**

There is no genuine factual dispute that Polinski Trust knew what it was doing. Respondent knew enough to register with the Commission as a transfer agent, using Form TA-1. OIP ¶ 4.

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<sup>4</sup> In *Robare Group, Ltd. v. SEC*, 922 F.3d 468, 479 (2019), the D.C. Circuit applied a different interpretation of the “willfully violated” standard in the context of a violation of Section 207 of the Advisers Act [15 U.S.C. § 80b-7]. *Robare* neither purported to, nor did, overrule *Wonsover*, as *Robare* was not decided by the D.C. Circuit seated *en banc*. As a result, in the context of remedial provisions, including Exchange Act Section 15(b)(4)—as contemplated here and in *Wonsover*—it is appropriate to continue to apply the standard established in *Wonsover*: that the term “willfully violated” requires only a showing that a respondent intentionally committed the act that constitutes the violation.

Respondent also knew enough to submit an Answer to the Division’s allegations in the OIP and admit to the violations. *See* Attachment 2 (Feb. 8 email). Although Respondent claims its violations were the result of forgetfulness and preoccupation with activities unrelated to its transfer agent obligations, those claims, even when accepted as true for purposes of this motion, fail to demonstrate that Respondent did not know it was failing to file required Commission forms. Instead Respondent’s claim simply shows that Respondent did not know the law and did not know it was breaking the law—matters that have no bearing on whether Polinski Trust’s conduct was “willful” in this context.

**V. REVOCATION OF THE POLINSKI TRUST’S TRANSFER AGENT REGISTRATION IS WARRANTED.**

Pursuant to Section 17A(c)(3) of the Exchange Act, the Commission shall revoke the registration of a transfer agent if it engaged in certain wrongful acts and if revocation is in the public interest. *See* 15 U.S.C. § 78q-1(c)(3).

**A. Polinski Trust’s Conduct Satisfies the Prerequisite for Remedial Action.**

The wrongful acts upon which revocation may be based include: (1) willfully violating any provision of the Exchange Act and the rules and regulations promulgated thereunder; and (2) willfully making a false or misleading statement of material fact in an application for registration filed with the Commission. *See* Exchange Act Section 17A(c)(3)(A); Exchange Act § 15(b)(4)(A)[15 U.S.C. § 78o(b)(4)(A)]; *see also* Exchange Act § 15(b)(4)(D). As discussed above, there is no genuine dispute that Polinski Trust willfully violated several provisions of the Exchange Act and rules promulgated thereunder. Moreover, by failing to amend the Form TA-1 once the information therein became inaccurate, Polinski Trust made a false and misleading statement of

material fact in an application for registration filed with the Commission. *See In re Fid. Transfer Servs., Inc.*, Exchange Act Release No. 34548, 2022 WL 969898, at \*6 (Mar. 29, 2022) (failing to file an amended Form TA-1 to correct inaccurate address is a false and misleading statement and omission of material information).

## **B. Revocation Is in the Public Interest**

In determining whether remedial action is in the public interest, the Commission considers: “the egregiousness of the respondent’s actions, the isolated or recurrent nature of the infraction, the degree of scienter involved, the sincerity of the respondent’s assurances against future violations, the respondent’s recognition of the wrongful nature of its conduct, and the likelihood that the respondent’s occupation will present opportunities for future violations.” *Steadman v. SEC*, 603 F.2d 1126, 1140 (5th Cir. 1979), *aff’d on other grounds*, 450 U.S. 91 (1981); *see also In re Phlo Corp.*, Exchange Act Release No. 55562, 2007 WL 966943, at \*12 (Mar. 30, 2007) (applying *Steadman* factors in assessing whether to revoke Phlo’s registration as a transfer agent). The Commission’s public interest inquiry is flexible, with no single factor being dispositive. *In re Tzemach David Netzer Korem*, Exchange Act Release No. 70044, 2013 WL 3864511, at \*4 (July 26, 2013). The remedy is intended to protect the trading public from further harm, not to punish the respondent. *McCarthy v. SEC*, 406 F.3d 179, 188 (2d Cir. 2005).

The undisputed facts show that Polinski Trust’s conduct was egregious and recurrent. Polinski Trust repeatedly demonstrated its disregard for its filing requirements by filing an inaccurate Form TA, not amending its registration application, and not filing its required annual reports. Polinski Trust’s repeated failures to comply with its filing obligations meant that Commission staff could not carry out its regulatory oversight functions. Furthermore, Polinski

Trust acted with at least recklessness in failing to amend its registration application. Polinski Trust must have been aware that it did not file its required annual reports, and Polinski Trust knew of its violations at least by September 1, 2022, when the Division sent Polinski Trust a Wells notice via email and mail.

Further, Polinski Trust's demonstrated unwillingness to comply with fundamental filing requirements indicates a likelihood that, but for revocation, Polinski Trust would not only engage in future violations but also engage in conduct that might have the effect of preventing Commission staff from identifying and addressing those violations. Accordingly, it is in the public interest to revoke Polinski Trust's transfer agent registration.

## **VI. CONCLUSION**

For the reasons set forth above, the Division respectfully requests that the Commission grant the Division's summary disposition motion and enter an order revoking Respondent's transfer agent registration.

Executed on April 10, 2023

/s/ Gregory N. Miller  
Gregory N. Miller  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549-3977  
(202) 551-4469  
[millergn@sec.gov](mailto:millergn@sec.gov)  
Counsel for the Division of Enforcement

**CERTIFICATE OF SERVICE**

I hereby certify that on April 10, 2023, I caused the Division's Motion for Summary Disposition and for Remedial Sanctions, and the Division's Index of Attachments, to be served in the manner set forth below:

Via eFap: Office of the Secretary

Via email to: Peter Joseph Polinski Trust  
c/o Peter Joseph Polinski

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

/s/ Gregory N. Miller  
Gregory N. Miller  
Counsel for the Division of Enforcement

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

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-21264**

<p><b>In the Matter of</b></p> <p><b>PETER JOSEPH POLINSKI TRUST,</b></p> <p><b>Respondent.</b></p>
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**THE DIVISION OF ENFORCEMENT'S INDEX OF ATTACHMENTS**

<b><u>Attachment</u></b>	<b><u>Description</u></b>
1	February 6, 2023, email
2	February 8, 2023, email
3	January 30, 2023, Polinski Trust answer



**DIVISION OF ENFORCEMENT ATTACHMENT 1**

**From:** [pi](#)  
**To:** [Miller, Gregory N](#)  
**Subject:** Re: FW: eFAP Notice of Filing – AP File No. 3-21264  
**Date:** Monday, February 06, 2023 4:03:30 PM  
**Attachments:** [image001.png](#)  
[image003.png](#)

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**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

yes thank you im sending out the other 2 copies i missed and will send you an email when im done thank you so much for the heads up and the reminder thank you thank you thank you

Sent with [Proton Mail](#) secure email.

----- Original Message -----

On Monday, February 6th, 2023 at 1:56 PM, Miller, Gregory N <[MillerGN@sec.gov](mailto:MillerGN@sec.gov)> wrote:

Mr. Polinski:

Pursuant to Rule 150(a) of the Commission's Rules of Practice, please find attached a .pdf copy of the "Declaration to Assist with Record Service" filed today on the Commission's Electronic Filings in Administrative Proceedings (eFAP) system.

Cordially,

**Gregory N. Miller**

Assitant Chief Litigation Counsel

Enforcement Division

Trial Unit

**OFFICE** (202) 551-4469

**MOBILE** (202) 297-4157

[millergn@sec.gov](mailto:millergn@sec.gov)

---

**DIVISION OF ENFORCEMENT ATTACHMENT 2**

**From:** [pj](#)  
**To:** [Miller, Gregory N](#)  
**Subject:** Re: FW: eFAP Notice of Filing – AP File No. 3-21264  
**Date:** Wednesday, February 08, 2023 3:08:52 PM  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[pjresponsetosec.pdf](#)  
[pjresponsetosec.pdf](#)

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

eFap will not let me upload the file.....i keep getting this error message.... ADF\_FACES-60097:For more information, please see the server's error log for an entry beginning with: ADF\_FACES-60096:Server Exception during PPR, #8 will try again tomorrow  
this email was written with good faith and honor

Sent with [Proton Mail](#) secure email.

----- Original Message -----

On Monday, February 6th, 2023 at 4:02 PM, pj <[ppolinski05@protonmail.com](mailto:ppolinski05@protonmail.com)> wrote:

yes thank you im sending out the other 2 copies i missed and will send you an email when im done thank you so much for the heads up and the reminder thank you thank you thank you

Sent with [Proton Mail](#) secure email.

----- Original Message -----

On Monday, February 6th, 2023 at 1:56 PM, Miller, Gregory N <[MillerGN@sec.gov](mailto:MillerGN@sec.gov)> wrote:

Mr. Polinski:

Pursuant to Rule 150(a) of the Commission's Rules of Practice, please find attached a .pdf copy of the "Declaration to Assist with Record Service" filed today on the Commission's Electronic Filings in Administrative Proceedings (eFAP) system.

Cordially,

**Gregory N. Miller**

Assitant Chief Litigation Counsel

**DIVISION OF ENFORCEMENT ATTACHMENT 3**

UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934  
Release No. 96585 / December 27, 2022

ADMINISTRATIVE PROCEEDING  
File No. 3-21264

In the Matter of  
  
PETER JOSEPH POLINSKI  
TRUST,  
  
Respondent.

ORDER INSTITUTING ADMINISTRATIVE  
PROCEEDINGS PURSUANT TO SECTION  
17A(c)(3) OF THE SECURITIES EXCHANGE  
ACT OF 1934 AND NOTICE OF HEARING

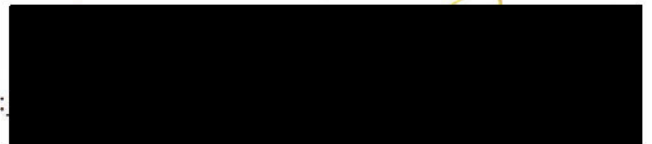
ANSWER TO ALLEGATIONS

Comes now Peter Polinski, who is grantor, settlor, trustor, trustee and beneficiary for PETER JOSEPH POLINSKI TRUST. CIK: 0001776962, TA-1 084-06634, and FINRA approved broker number 007-00201. Violations of not keeping an updated TA-1 with proper address and not updating my TA-2 for the years 2019, 2020, 2021, forgetting to update the phone number within 60 days are in fact not violated on purpose or with any ill intent. I am a Private Attorney General, Financial Consultant, and more importantly a Helio Gnostic Priest. Over the last 3 years I have dedicated my time to discharging millions of dollars of debt. My Grandmothers were both filled with cancer so I have been attending to them and finally have all cancers in remission. I am about my fathers business Luke 2:49. I am self-taught when it comes to the S.E.C. When it comes to these violations let it be known that I have not committed any securities fraud, no estate embezzlement, also no banking fraud. I simply have been so busy with spiritually teaching, taking care of my grandmothers health and their bills, also doing court work all pro bono that I forgot that I have to keep all records up to date in a professional and timely manner within the laws and rules of the Commission. I did contact the S.E.C and a employee named MASON, a female whose phone number is [REDACTED], I had a question on one of the TA-2 forms and no one ever got

back to me. As I said before I am self-taught and was looking to privately trade my corporate stock in accordance to rule 144a regulation d, regulation S, regulations 12g, also see Rule 506(b) of Regulation D is considered a "safe harbor" under Section 4(a)(2). It provides objective standards that a company can rely on to meet the requirements of the Section 4(a)(2) exemption. Companies conducting an offering under Rule 506(b) can raise an unlimited amount of money and can sell securities to an unlimited number of accredited investors. An offering under Rule 506(b), however, is subject to the following requirements: no general solicitation or advertising to market the securities and securities may not be sold to more than 35 non-accredited investors (all non-accredited investors, either alone or with a purchaser representative, must meet the legal standard of having sufficient knowledge and experience in financial and business matters to be capable of evaluating the merits and risks of the prospective investment. My Intentions of being a Transfer Agent is to Usher in Heaven on Earth. I am Truly Sorry for not keeping updated transfer agent forms and a proper address in accordance with the rules of the commission. Please forgive me and I promise I will be the best transfer agent the S.E.C has had the pleasure of approving.

This Letter was written in good faith, clean hands, and sound mind.

By:



TRANSFER AGENT PETER JOSEPH POLINSKI TRUST

Acts 5: 29  
2 corinthians 5: 20

**CERTIFICATE OF SERVICE**

**On January 30, 2023 Peter Joseph Polinski having mailed, emailed, and sent eFap answer to allegations brought by the Securities Exchange Commission**

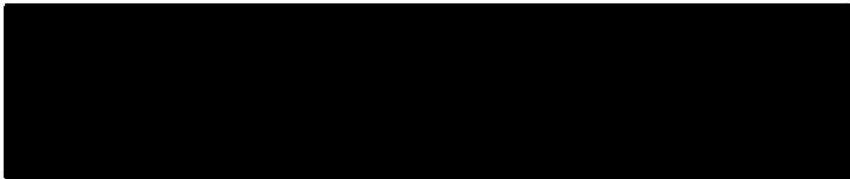
**Located at :**

**Office of the Secretary  
U.S. Securities and Exchange Commission  
100 F Street NE, Mail Stop 1090  
Washington, DC 20549  
Phone: 202-551-5410  
Email: APFilings@sec.gov**

**REPRESENTATION STATEMENT**

I certify that **all participants in said case will get a certified copy including.**

- 1.) Answer to Allegations for Transfer Agent Violation brought by The Enforcement team at The Securities Exchange Commission
- 2.) Mailed to, emailed, and eFap .... Secretary of the Securities Exchange Commission located at address above and  
Gregory N. Miller, Esq.  
Division of Enforcement  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-5977  
202-551-4469  
MillerGN@sec.gov



Peter Joseph Polinski  
Investor/Trust beneficiary

Signature

Acts 5:29

2 Corinthians 5:20

1 Corinthians 15:26

Love and light  
Be with  
you