

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Miscellaneous Action No. 24-mc- 122-DDD

SECURITIES AND EXCHANGE COMMISSION,

Petitioner,

v.

CAST YOUR NETS MINISTRIES;  
CYNM CONSULTING, LLC;  
PHILLIP TRUJILLO; and  
JEREMY (“JE”) HAMMONDS,

Respondents.

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**APPLICATION FOR ORDER TO SHOW CAUSE AND FOR ORDER COMPELLING  
COMPLIANCE WITH ADMINISTRATIVE SUBPOENAS**

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The Securities and Exchange Commission (“Commission” or “SEC”) is investigating whether Cast Your Nets Ministries; CYNM Consulting, LLC; Phillip Trujillo; and Jeremy (“Je”) Hammonds<sup>1</sup> are conducting a fraudulent and unregistered securities offering. In furtherance of its investigation, the SEC served administrative subpoenas seeking documents from Cast Your Nets Ministries; CYNM Consulting, LLC; and Mr. Trujillo and served administrative subpoenas seeking testimony from Mr. Trujillo and Dr. Hammonds (collectively, the “Respondents”). Other than producing ten documents, Cast Your Nets Ministries; CYNM Consulting, LLC; and Mr.

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<sup>1</sup> We understand Dr. Hammonds’ legal name to be Jeremy Hammonds but that he goes by Je Hammonds. Counsel has referred to him as Dr. Hammonds, and he is described on CYNM’s website as having a Ph.D. Accordingly, we refer to him as Dr. Hammonds as well.

Trujillo have refused to comply with the Commission’s document subpoenas. Further, neither Mr. Trujillo nor Dr. Hammonds appeared for their scheduled testimony.

Counsel for Respondents has informed the SEC staff that Respondents will not comply with the subpoenas, will not produce any additional documents, and will not appear for testimony. Counsel for the Respondents has acknowledged that Respondents “are fully aware that the SEC has reserved its authority to pursue enforcement of the subpoenas in federal court.” Declaration of Abigail L.P. Edwards (“Edwards Decl.”) ¶ 24 & Ex. 12. As a result, the SEC has no other remedy than the judicial enforcement of the subpoenas. In this case, the SEC needs this Court’s assistance to carry out its statutorily authorized mission to protect investors.

The Commission respectfully requests that the Court: (1) issue an Order to Show Cause why Cast Your Nets Ministries; CYNM Consulting, LLC; Mr. Trujillo; and Dr. Hammonds should not be compelled to comply with the SEC’s administrative subpoenas; and (2) following notice and an opportunity to be heard, order Cast Your Nets Ministries; CYNM Consulting, LLC; Mr. Trujillo; and Dr. Hammonds to comply with the Commission’s subpoenas.

## STATEMENT OF FACTS

### I. Respondents

**Cast Your Nets Ministries** is a Washington state non-profit corporation with its principal office located in Windsor, Colorado. Edwards Decl. ¶ 18. Cast Your Nets Ministries’ website lists Mr. Trujillo and Dr. Hammonds as members of its Leadership. Edwards Decl. ¶ 4, n.1. That website offered three investment programs and a crypto asset, all of which are described further below. Edwards Decl. ¶ 4. Cast Your Nets Ministries is also the parent company of CYNM Consulting, LLC. Edwards Decl. ¶ 12 & Ex. 3.

**CYNM Consulting, LLC** is a limited liability corporation registered in the state of Delaware with its principal office located in Windsor, Colorado. Edwards Decl. ¶ 10. We collectively refer to Cast Your Nets Ministries and CYNM Consulting, LLC as “CYNM.”

**Mr. Trujillo** is a board member of Cast Your Nets Ministries. Edwards Decl. ¶ 26. Mr. Trujillo was previously charged by the SEC with conducting a fraudulent offering (*see SEC v. Trujillo*, Civ. No. 09-cv-00403-MSK-KMT (D. Colo.) (February 26, 2009)) and subsequently convicted by criminal authorities and sentenced to 12 years in prison for the same underlying conduct (*see Colorado v. Trujillo*, D035 2010-CR-000749 (State of Colorado, Larimer County, March 7, 2012)). Edwards Decl. ¶ 26.

**Dr. Hammonds** is the Chief Operating Officer (“COO”) of Cast Your Nets Ministries. Edwards Decl. ¶ 36.

## **II. The SEC Formal Order and Investigation**

The SEC is investigating whether the Respondents are conducting a fraudulent and unregistered securities offering. Edwards Decl. ¶ 4. CYNM offered three investment programs and a crypto asset on its website:

- 1) the “CYN Legacy Program,” which was described as “a program partnering with Christian churches and organizations to facilitate fund raising projects”;
- 2) the “CYN Alternative Savings Plan,” which was described as “a short term, high-yield program that pays 2% per month up to 6 months for a total of 12%”;
- 3) the “Alternative Retirement Program,” which CYNM advertised at various times as providing “15% Yearly Returns” or “a 25% return each year for three years”; and
- 4) a crypto asset known as the “CYN Token,” which promises to “[d]ouble Your

Retirement Savings In Just 5 Years.”<sup>2</sup>

Edwards Decl. ¶ 4.

On April 11, 2024, the Commission issued an Order Directing Private Investigation and Designating Officers to Take Testimony in an investigation entitled *In the Matter of CYNM Consulting, LLC*. Edwards Decl. ¶ 5 (the “Formal Order”).<sup>3</sup> A formal order generally describes the nature of an investigation and designates specific staff members to act as officers of the Commission for purposes of the investigation. The Formal Order empowers the designated staff members to administer oaths and affirmations, subpoena witnesses, compel their attendance, take evidence, and require the production of documents and other materials. Edwards Decl. ¶ 5. The Director of Enforcement approved the Formal Order. *Id.* The Formal Order was subsequently corrected on July 10, 2024, to change the name of the investigation to *In the Matter of Cast Your Nets Ministries*. Edwards Decl. ¶¶ 6–7.

### **III. The Administrative Subpoenas**

Following issuance of the Formal Order, a member of the SEC staff designated in the Formal Order issued subpoenas to Respondents. Edwards Decl. ¶¶ 10, 18, 27, 37 & Exs. 2, 6, 13, 19. On May 20 and August 6, 2024, the SEC staff properly served subpoenas seeking documents

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<sup>2</sup> Per the CYN Token website, described further in the Edwards Decl. ¶ 26 n.4, the CYN Token is a “Faith-Driven Utility” Token, that promises “[a]ccess to alternative savings, retirement, and building programs,” “[a]ccess to low interest bridge, car, and home equity loans,” “access to CYN exclusive staking and vesting programs,” and other benefits. Edwards Decl. ¶ 4, n.2.

<sup>3</sup> The SEC staff will provide a copy of the Formal Order or the corrected Formal Order to the Court upon request, but respectfully requests that any such review be conducted *in camera*.

from CYNM Consulting, LLC and Cast Your Nets Ministries<sup>4</sup> related to, among other things, the structure and business of the entities, the products CYNM offers, and the crypto asset advertised on CYNM's website. Edwards Decl. ¶¶ 10, 18 & Exs. 2, 6. CYNM has only produced ten documents in response to these subpoenas. Edwards Decl. ¶¶ 16, 20.

On September 30, 2024, the SEC staff designated in the Formal Order served a subpoena seeking documents and testimony from Mr. Trujillo concerning, among other things, the structure and nature of CYNM's products. Edwards Decl. ¶ 27 & Ex. 13. The subpoena required Mr. Trujillo to appear for testimony at the Commission's Denver Regional Office on October 21, 2024. *Id.* Mr. Trujillo has not produced any documents in response to this subpoena and did not appear for testimony. Edwards Decl. ¶¶ 31, 34.

On September 30, 2024, the SEC staff designated in the Formal Order also served a subpoena for testimony on Dr. Hammonds. Edwards Decl. ¶ 37 & Ex. 19. The subpoena required Dr. Hammonds to appear for testimony at the Commission's Denver Regional Office on October 22, 2024. *Id.* Dr. Hammonds did not appear for testimony as required by the subpoena. *Id.* ¶ 41.

On November 1, 2024, counsel for Respondents sent the SEC staff three letters stating that CYNM Consulting, LLC; Cast Your Nets Ministries; and Mr. Trujillo would not be producing any more documents and that neither Mr. Trujillo nor Dr. Hammonds would be appearing for testimony. Edwards Decl. ¶¶ 24, 33, 43 & Exs. 12, 18, 21.

CYNM has principally argued that the SEC does not have jurisdiction because the

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<sup>4</sup> The May 20, 2024 subpoena was served via UPS on CYNM Consulting, LLC's registered agent as well as its principal office located in Windsor, Colorado. Edwards Decl. ¶ 10 & Ex. 2. After service of this subpoena, counsel appeared and accepted service of the August 6, 2024 subpoena. Edwards Decl. ¶ 18 & Ex. 6.

products CYNM offers and sells are loans, not securities, and are therefore outside of the jurisdiction of the SEC. *See* Edwards Decl. ¶¶ 12, 16, 19, 20, 22, 24, 28, 33, 38, 43 & Exs. 3, 5, 7, 8, 9, 10, 12, 14, 18, 20, 21. CYNM has also stated that any documents or information about the CYN Token must come from a UK entity issuing the token, CASTYOURNETS, LTD. and that counsel could not accept service of a subpoena on behalf of that foreign entity. Edwards Decl. ¶¶ 13, 14 & Ex. 4. The SEC staff has explained (1) that Respondents must comply with the lawfully issued subpoenas, (2) that the staff has authority to investigate whether or not CYNM is offering and selling, or has offered and sold, unregistered securities and whether or not it is making false and misleading statements in the offer and sale of securities, or has made such statements, and (3) the ten documents produced by CYNM to date is insufficient to assess whether CYNM offered and sold securities and made false or misleading statements in connection therewith. Edwards Decl. ¶¶ 13, 17.

Despite the SEC staff’s repeated attempts to secure compliance with the subpoenas, Respondents’ counsel informed the SEC staff that his clients would not comply with the subpoenas. Edwards Decl. ¶ 22 & Ex. 10. Specifically, on November 1, 2024, counsel stated that “CYNM will not be providing any further information to the SEC voluntarily in response to the subpoena issued to CYNM. We are fully aware that the SEC has reserved its authority to pursue enforcement of the subpoenas in federal court.” Edwards Decl. ¶ 24 & Ex. 12. Counsel reiterated this refusal to comply with the SEC subpoenas on behalf of Mr. Trujillo and Dr. Hammonds as well. Edwards Decl. ¶¶ 33, 43 & Exs. 18, 21.

## ARGUMENT

### I. The Court Has Jurisdiction and a Summary Proceeding is Appropriate.

The Securities Exchange Act of 1934 (the “Exchange Act”) provides that the SEC “may, in its discretion, make such investigations as it deems necessary to determine whether any person has violated, is violating, or is about to violate [the Exchange Act].” 15 U.S.C. § 78u(a). As part of such investigations, SEC staff who are designated as officers of the SEC for purposes of the investigation may, among other things, subpoena documents and testimony. 15 U.S.C. § 78u(b). *See also SEC v. O’Brien*, 467 U.S. 735, 741 (1984) (“Congress has vested the SEC with broad authority to conduct investigations into possible violations of the federal securities laws and to demand production of evidence relevant to such investigations.”)

The Court has jurisdiction over this subpoena enforcement action pursuant to Section 21(c) of the Exchange Act. *See* 15 U.S.C. § 78u(c); 15 U.S.C. § 78u(e); Fed. R. Civ. P. 81(a)(5). The SEC’s investigation is being conducted by the Denver Regional Office, Edwards Decl. ¶ 8, and thus jurisdiction and venue are appropriate in this district. *See* 15 U.S.C. § 78u(c) (“[T]he Commission may invoke the aid of any court of the United States within the jurisdiction of which such investigation . . . is carried on.”).

The SEC respectfully requests that its application be considered promptly in a summary proceeding. “Federal securities law authorizes the SEC to seek an order from this Court requiring compliance with a subpoena in a summary proceeding.” *SEC v. Harman Wright Grp., LLC*, No. 18-mc-00190-CMA, 2018 WL 6102758, at \*2 (D. Colo. Nov. 21, 2018) (*aff’d*, 777 F. App’x 276 (10th Cir. 2019); *see also SEC v. Conway*, No. 22-mc-00212-DDD-KAS, 2024 WL 4252821, at \*3 (D. Colo. Sept. 19, 2024) (Report and Recommendation adopted by the District

Court Oct. 11, 2024) (same). “Further, a prompt ruling on the SEC’s application is warranted to avoid further delay in the investigation.” *Harman Wright Grp., LLC*, 2018 WL 6102758, at \*2 (citing *SEC v. First Sec. Bank*, 447 F.2d 166, 168 (10th Cir. 1971); *SEC v. Lavin*, 111 F.3d 921, 926 (D.C. Cir. 1997)).

## **II. The Court Should Enforce the Administrative Subpoenas.**

Under well-established Supreme Court and Tenth Circuit precedent, this Court should enforce the SEC’s administrative subpoenas because: (1) the investigation is being conducted pursuant to a legitimate purpose; (2) the subpoenas seek information that may be relevant to that purpose; (3) the information sought is not already in the SEC’s possession; and (4) all required administrative steps have been followed. *Harman Wright Grp.*, 2018 WL 6102758, at \*2 (citing *United States v. Powell*, 379 U.S. 48, 57–58 (1964); *RNR Enter., Inc. v. SEC*, 122 F.3d 93, 96 (2d Cir. 1997); see also *Application to Enforce Administrative Subpoenas Duces Tecum of SEC v. Knowles*, 87 F.3d 413, 415 (10th Cir. 1996)); *Conway*, 2024 WL 4252821, at \*3 (also quoting *Powell*). The SEC’s burden under this framework is a “‘slight one,’ and ‘[t]he requisite showing is generally made by affidavit of the agent who issued the summons and who is seeking enforcement.’” *Harman Wright Grp.*, 2018 WL 6102758, at \*2 (quoting *United States v. Balanced Fin. Mgmt., Inc.*, 769 F.2d 1440, 1443 (10th Cir. 1985) (internal quotations omitted)); see also *Conway*, 2024 WL 4252821, at \*3. As discussed below, the SEC meets these factors.

*First*, the Commission’s investigation is being conducted pursuant to a legitimate purpose. “Congress has vested the SEC with broad authority to conduct investigations into possible violations of the federal securities laws and to demand production of evidence relevant to such investigations.” *O’Brien*, 467 U.S. at 741. The Formal Order pursuant to which the

subpoenas were issued authorizes such an investigation into possible violations of the federal securities laws. Edwards Decl. ¶ 5. As discussed above, the SEC is investigating whether Respondents are conducting a fraudulent and unregistered securities offering. Edwards Decl. ¶ 4. CYNM publicly advertised on its website, and offered and sold, three investment programs and a crypto asset, each of which may be a security. *Id.* The SEC is investigating whether CYNM violated the federal securities laws in connection with the offer or sale of a security.

*Second*, the subpoenas seek information that may be relevant to the SEC’s legitimate investigation. “Administrative agencies vested with investigatory power have broad discretion to require the disclosure of information concerning matters within their jurisdiction.” *Philips Petroleum Co. v. Lujan*, 951 F.2d 257, 260 (10th Cir. 1991). Relevance is established when the information sought is not “plainly incompetent or irrelevant to any lawful purpose.” *Endicott Johnson Corp. v. Perkins*, 317 U.S. 501, 509 (1943) (cited in *Philips Petroleum*, 951 F.2d at 260). The subpoenas seek documents and testimony concerning the structure and business of CYNM, the products that they offered and sold, information about investors or customers who purchased those products, the crypto asset advertised on the CYNM website, Mr. Trujillo’s involvement with CYNM, relevant agreements between Mr. Trujillo and CYNM, Dr. Hammonds’ involvement with CYNM, and relevant agreements between Dr. Hammonds and CYNM. Edwards Decl. ¶¶ 10, 18, 27, 37 & Exs. 2, 6, 13, 19. That information is relevant to the SEC’s investigation into whether the products CYNM is offering and selling (or has offered and sold) are securities and whether CYNM has violated the federal securities laws in connection with such offers or sales, including by making fraudulent statements and engaging in an unregistered securities offering. While there is evidence suggesting that the products are

securities, proving one of the products is a security is not the burden at this stage. As discussed below, in the federal securities laws, Congress committed the initiation and conduct of investigations to the SEC's "discretion." *See, e.g.*, Securities Act of 1933 ("Securities Act") Section 20, 15 U.S.C. § 77t(a) ("the Commission . . . may, in its discretion . . . investigate" possible violations of the securities laws); Exchange Act Section 21(a), 15 U.S.C. § 78u(a) ("The Commission may, in its discretion, make such investigations as it deems necessary to determine whether" the securities laws have been violated). Put another way, the SEC is entitled to issue subpoenas to determine whether (among other things) the products at issue are securities; it need not (as Respondents assume) prove the products are securities in order to secure compliance with the subpoenas. Here, the SEC is investigating whether any of the CYNM-offered programs violated the federal securities laws, and the subpoenas issued are relevant to that purpose.

*Third*, the subpoenas seek information that is not already in the SEC's possession. CYNM has only produced ten documents. Edwards Decl. ¶¶ 16, 20. The SEC has sought, but has not received, documents concerning the structure and business of CYNM, the products that they offer, the entities' investments, and the crypto asset advertised on the CYNM website. Edwards Decl. ¶¶ 10, 18 & Exs. 2, 6. Mr. Trujillo has not testified under oath nor produced documents concerning, among other topics, his involvement with CYNM, the structure and nature of the products CYNM has offered, relevant agreements between him and the CYNM entities, advertising of the CYNM products, and information related to the CYN Token. Edwards Decl. ¶¶ 27, 31, 34 & Ex. 13. Dr. Hammonds has not testified under oath concerning, among other things, his involvement with CYNM, the structure and nature of the products CYNM has offered, relevant agreements between him and the CYNM entities, advertising of the CYNM

products, and information related to the CYN Token. Edwards Decl. ¶¶ 37, 41 & Ex. 19. This information is in CYNM's, Mr. Trujillo's, and Dr. Hammonds' (and not the SEC's) possession.

*Fourth*, the SEC staff has followed all required administrative steps. The Exchange Act authorizes the SEC to initiate investigations and designate officers to, *inter alia*, subpoena witnesses, take evidence, and require the production of records that the SEC deems relevant to its investigation. 15 U.S.C. § 78u(a)(1), (b). The Commission delegated this authority to the Director of the Division of Enforcement. 17 C.F.R. § 200.30-4(a)(13), (a)(1). The Director of Enforcement approved the Formal Order initiating this investigation and authorizing designated staff members to subpoena witnesses, take evidence, and require the production of records deemed relevant to the investigation. Edwards Decl. ¶ 5. The subpoenas were signed by an SEC staff attorney so designated for purposes of this investigation and were properly served on CYNM, Mr. Trujillo, and Dr. Hammonds. *Id.* ¶¶ 10, 18, 27, 37 & Exs. 2, 6, 13, 19. The SEC has thus met all administrative requirements.

Because the SEC readily satisfies its burden, the Court should enforce the Commission's administrative subpoenas. *See, e.g., Resolution Trust Corp. v. Thornton*, 41 F.3d 1539, 1544 (D.C. Cir. 1994) ("If an agency's subpoena satisfies these requirements, we *must* enforce it.") (emphasis added) (citation omitted); *see also, e.g., SEC v. Blackfoot Bituminous, Inc.*, 622 F.2d 512, 515–16 (10th Cir. 1980) (affirming district court orders enforcing SEC subpoenas); *First Sec. Bank of Utah*, 447 F.2d at 167–69 (same); *SEC v. Conway*, No. 22-mc-00212-DDD-KAS, 2024 WL 4252821, at \*13 (D. Colo. Sept. 19, 2024) (Report and Recommendation adopted by the District Court Oct. 11, 2024); *SEC v. Kimmel*, No. 19-mc-00113-CMA, 2020 WL 2800813,

at \*5 (D. Colo. May 29, 2020) (compelling respondent to comply with SEC administrative subpoenas); *Harman Wright Grp.*, 2018 WL 6102758, at \*3 (same).

### **III. Respondents Do Not Have a Valid Reason for Refusing to Comply with the Subpoenas.**

Having established that the SEC satisfies all the criteria to have its subpoenas judicially enforced, Respondents may only resist compliance with the subpoenas if they can show that the subpoenas are unreasonable, issued in bad faith or for other improper purposes, or that “compliance would be ‘unnecessarily burdensome.’” *RNR Enter., Inc.*, 122 F.3d at 97 (quoting *SEC v. Brigadoon Scotch*, 480 F.2d 1047, 1056 (2d Cir. 1973)). It is the burden of the party who received the subpoena to establish that the subpoena is unreasonable. *See Blackfoot Bituminous*, 622 F.2d at 515; *Brigadoon Scotch*, 480 F.2d at 1056. That burden is “not easily met” where, as here, the SEC’s inquiry is legally authorized, and the information is relevant to the inquiry. *Brigadoon Scotch*, 480 F.2d at 1056.

In refusing to comply with the Commission’s subpoenas, Respondents have raised two arguments: (1) the programs CYNM offered and sold are not securities, and (2) all information about the CYN Token must come from CASTYOURNETS, LTD, a related foreign entity. Neither argument provides a valid reason for non-compliance.

*First*, Respondents assert that the SEC lacks jurisdiction to conduct its investigation because the products CYNM offers and sells (or offered and sold) are loans and not securities. Edwards Decl. ¶¶ 24, 33, 43 & Exs. 12, 18, 21. However, as noted above, while there is evidence suggesting that the products are securities, proving one of the products is a security is not the burden at this stage. In the federal securities laws, Congress committed the initiation and conduct of investigations to the SEC’s “discretion.” *See, e.g.*, Securities Act of 1933 (“Securities Act”)

Section 20 [15 U.S.C. § 77t(a)] (“the Commission . . . may, in its discretion . . . investigate” possible violations of the securities laws); Exchange Act Section 21(a) [15 U.S.C. § 78u(a)] (“The Commission may, in its discretion, make such investigations as it deems necessary to determine whether” the securities laws have been violated); *see also O’Brien*, 467 U.S. at 745 (“Congress intended to vest the SEC with considerable discretion in determining when and how to investigate possible violations of the statutes administered by the Commission”); *Gentile v. SEC*, 974 F.3d 311, 319 (3rd Cir. 2020) (“an agency’s decision on whether to investigate is a matter committed to agency discretion by law”). The SEC ““can investigate merely on suspicion that the law is being violated, or even just because it wants assurance that it is not.”” *SEC v. Arthur Young & Co.*, 584 F.2d 1018, 1030 (D.C. Cir. 1978) (quoting *Morton Salt Co.*, 338 U.S. at 642–43). Put simply, while the SEC must ultimately prove the products at issue are securities in any enforcement action it might bring, at this stage the SEC is entitled to subpoena information to develop that proof and proof of any associated securities law violations.

*Second*, in seeking enforcement of these subpoenas, the SEC is not seeking documents directly from CASTYOURNETS, LTD, the foreign entity. Rather, we have reason to believe that Respondents have documents in their custody and control related to the CYN Token. The CYN Token is advertised on the Cast Your Nets Ministries website under “services.” Edwards Decl. ¶ 26, n.4. Mr. Trujillo is listed as the Co-Founder and CEO of the CYN Token. Edwards Decl. ¶ 26. And Dr. Hammonds is listed as the COO of the CYN Token. Edwards Decl. ¶ 36. We have also seen evidence that Cast Your Nets Ministries has received funds designated for the purchase of “tokens” and has provided at least one individual with information about the CYN Token. Edwards Decl. ¶ 15. Thus, it presumably has relevant information regarding the CYN Token.

The fact that another entity or individual may also have relevant information does not excuse the Respondents' obligation to produce relevant information in their possession, custody, or control.

In sum, the SEC has met its slight burden to show that enforcement of the subpoenas is appropriate, and Respondents cannot show that the subpoenas are unreasonable, issued in bad faith or for other improper purposes, or that ““compliance would be ‘unnecessarily burdensome.’” *RNR Enter., Inc.*, 122 F.3d at 97 (quoting *Brigadoon Scotch*, 480 F.2d at 1056).

### CONCLUSION

For the reasons set forth above, the SEC respectfully requests that the Court: (1) issue an Order to Show Cause why this Court should not order Respondents to comply with the SEC's administrative subpoenas; and (2) following receipt of Respondents' arguments, if any, and a reply thereto by the Commission, enter an Order compelling Respondents to comply with the subpoenas and directing such other relief as may be appropriate.

Respectfully submitted this 12 day of December, 2024.

*s/ Jacqueline M. Moessner*  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on December 12, 2024, I caused the foregoing application and supporting documents to be electronically filed using the CM/ECF system. I further certify that I will cause a copy of the foregoing to be served by email and U.S. Mail on the following once this case is docketed in the Court's CM/ECF system:

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*s/ Jacqueline M. Moessner*  
U.S. Securities and Exchange Commission