

UNITED STATES OF AMERICA
before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 89589 / August 17, 2020

Admin. Proc. File No. 3-19864

In the Matter of

TRANS-PACIFIC AEROSPACE COMPANY, INC., AND
VERTICAL COMPUTER SYSTEMS, INC.

Respondents.

ORDER GRANTING LEAVE TO FILE STATEMENT OF VIEWS

On July 9, 2020, the Securities and Exchange Commission issued an Order Instituting Proceedings (“OIP”) pursuant to Section 12(j) of the Securities Exchange Act of 1934 against respondent Vertical Computer Systems, Inc.¹ The OIP instituted administrative proceedings to determine whether Vertical is delinquent in filing timely periodic reports with the Commission and, if so, whether it is necessary and appropriate for the protection of investors to suspend for up to twelve months or revoke the registration of Vertical’s securities.

On July 20, 2020, non-party Steven Infanti, Sr. filed a motion pursuant to Rule of Practice 210(d) and (e) for leave to file an amicus brief or, alternatively, to state views. Infanti contends that, because he is a shareholder of Vertical “seeking to be heard on the appropriate sanctions for delinquent filings,” he is “exactly the kind of party that the Commission envisaged” filing an amicus brief or statement of views. Infanti included a brief with his motion, which he requests be accepted as his amicus brief or statement of views. In his brief, Infanti requests that the Commission issue a six-month suspension of Vertical’s registration in lieu of revocation to permit him and other shareholders sufficient time to implement a plan to remove Vertical’s leadership and make Vertical current on its delinquent Commission filings. The Division of Enforcement has not filed an opposition to Infanti’s motion.

¹ *Trans-Pacific Aerospace Co.*, Exchange Act Release No. 89275, 2020 WL 3892715 (July 9, 2020).

Given the circumstances, we find it appropriate to grant Infanti's request to file the brief included with his motion as a statement of views under Rule 210(e).² Accordingly, it is ORDERED that the brief included with Infanti's motion is accepted.

For the Commission, by the Office of the General Counsel, pursuant to delegated authority.

Vanessa A. Countryman
Secretary

² 17 C.F.R. § 201.210(e) (providing that “[a]ny person may make a motion seeking leave to file a memorandum or make an oral statement of his or her views” and that “[a]ny such communication may be included in the record”); *see also Adopting Release: Rules of Practice*, Exchange Act Release No. 35833, 1995 WL 368865, at *48 (June 9, 1995) (comment to Rule 210(e) stating that “[f]rom time to time persons, particularly individual security holders[,] . . . will seek to make written statements of their views”).