

UNITED STATES OF AMERICA
before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 93482 / October 29, 2021

Admin. Proc. File No. 3-20510

In the Matter of

JADE GLOBAL HOLDINGS, INC. (F/K/A MEDIA
ANALYTICS CORPORATION)

ORDER REGARDING SERVICE

The Securities and Exchange Commission (“Commission”) issued an Order Instituting Proceedings (“OIP”) on August 31, 2021, pursuant to Section 12(j) of the Securities Exchange Act of 1934, against respondent Jade Global Holdings, Inc. (f/k/a Media Analytics Corporation) (“Respondent”).¹

On October 13, 2021, the Division of Enforcement filed a Declaration of Sandhya C. Harris, which asserted that, pursuant to Commission Rule of Practice 141(a)(2)(ii),² service of the OIP was made on Respondent on September 4, 2021. The OIP, Respondent’s last periodic report, a Form 10-K for the period ended December 31, 2019, and Respondent’s last filing with the Commission, a Form NT 10-Q filed on June 29, 2020, each list a mailing address in Miami, Florida, for Respondent. The declaration attaches as an exhibit evidence that the OIP was served on Respondent at this address on September 4, 2021. A separate exhibit contains a print-out of a page from the Florida Division of Corporations stating that Respondent had become an inactive corporation and filed an administrative dissolution on September 24, 2021. Without explanation, the declaration states that service was made on Respondent’s registered agent, Everasia Financial Group, Inc., at the same mailing address as Respondent, even though a photocopy of the envelope is addressed to Respondent and not to the registered agent. The declaration also states that Respondent’s last filing was a Form NT 10-K filed on June 29, 2020, that listed a mailing address in the Republic of Korea. But Respondent made no such filing, and none of Respondent’s recent filings with the Commission list a mailing address in Korea.

In light of the foregoing, we find that there is an absence of information necessary to confirm that service of the OIP on Respondent has been properly made. Accordingly, it is

¹ *Jade Global Holdings, Inc. (f/k/a Media Analytics Corporation)*, Exchange Act Release No. 92832, 2021 WL 3929518 (Aug. 31, 2021).

² 17 C.F.R. § 201.141(a)(2)(ii).

ORDERED that the Division shall file a status report concerning service of the OIP on Respondent by November 12, 2021, and every 28 days thereafter until service is accomplished.

The parties' attention is directed to the most recent amendments to the Commission's Rules of Practice, which took effect on April 12, 2021, and which include new e-filing requirements.³

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

Vanessa A. Countryman
Secretary

³ *Amendments to the Commission's Rules of Practice*, Exchange Act Release No. 90442, 2020 WL 7013370 (Nov. 17, 2020), 85 Fed. Reg. 86,464, 86,474 (Dec. 30, 2020), <https://www.sec.gov/rules/final/2020/34-90442a.pdf>; *Instructions for Electronic Filing and Service of Documents in SEC Administrative Proceedings and Technical Specifications*, <https://www.sec.gov/efapdocs/instructions.pdf>. The amendments impose other obligations such as a new redaction and omission of sensitive personal information requirement. *Amendments to the Commission's Rules of Practice*, 85 Fed. Reg. at 86,465–81.