

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

**SECURITIES EXCHANGE ACT OF 1934**  
Release No. 64694 / June 16, 2011

**ADMINISTRATIVE PROCEEDING**  
File No. 3-14256

**In the Matter of**

**GLOBAL SENTRY EQUITY  
TRANSFER, INC.,**

**Respondent.**

**AMENDED ORDER  
INSTITUTING  
ADMINISTRATIVE AND  
CEASE-AND-DESIST  
PROCEEDINGS PURSUANT TO  
SECTIONS 17A(c)(3) AND 21C  
OF THE SECURITIES  
EXCHANGE ACT OF 1934**

**I.**

The Securities and Exchange Commission (“Commission”) deems it appropriate and in the public interest that public administrative and cease-and-desist proceedings be, and hereby are, instituted pursuant to Sections 17A(c)(3) and 21C of the Securities Exchange Act of 1934 (“Exchange Act”) against Global Sentry Equity Transfer, Inc. (“Respondent” or “Global Sentry”).

**II.**

After an investigation, the Division of Enforcement alleges that:

**A. RESPONDENT**

1. **Global Sentry Equity Transfer, Inc. (“Global Sentry”)** is a Nevada corporation with its principal place of business in Ontario, Canada. Global Sentry has been registered with the Commission as a transfer agent since July 30, 2007, pursuant to Section 17A of the Exchange Act. During 2008, Global Sentry was the transfer agent of record for, among other entities, Infinity Medical Group, Inc. (“Infinity”), Cannon Exploration Inc. (“Cannon”), and China Jiangsu Golden Horse Steel Ball Inc. (“China Jiangsu”).

**B. OTHER RELEVANT PERSON AND ENTITIES**

1. Christopher Wheeler, age 43, is a resident of Victor, New York. He is the owner of OTCStockExchange.com, a stock promotion website. Wheeler does not hold any securities licenses, and is not associated with any entity that is registered with the Commission.

2. Infinity was incorporated in Nevada in 1989 as D.V. Holdings, Inc. Between June 1999 and August 2007, the company operated at various times under the names Iceberg Corporation of America, Royal Alliance Entertainment, Inc., and Infinity. Infinity purports to be a specialty healthcare company and initially listed its principal place of business as Ontario, Canada. During the relevant period, Infinity did not have a class of securities registered under the Exchange Act and did not register any offering of securities under the Securities Act of 1933 (“Securities Act”). During the relevant period, Infinity’s shares were quoted on the Pink Sheets operated by Pink OTC Markets Inc. (“Pink Sheets”).

3. Cannon was incorporated in Delaware in 1983 as Citisource, Inc. (“Citisource”). In June 2006, the company changed its name from Citisource to China Shuangji Cement Corporation, but changed it back to Citisource in October 2007. In April 2008, the company changed its name to Cannon. Cannon purports to be a mining and exploration company and listed its principal place of business as Ontario, Canada. During the relevant period, Cannon did not have a class of securities registered under the Exchange Act and did not register any offering of securities under the Securities Act. During the relevant period, Cannon’s shares were quoted on the Pink Sheets.

4. China Jiangsu was incorporated in Nevada in 1999 as Puppettown.com, Inc. The company changed its name to Business Translation Services, Inc. in December 2001, to Muller Media, Inc. in February 2002, and to China Jiangsu in October 2007. Since late 2008, the company has operated as Santana Mining, Inc. During the relevant period, the company’s principal place of business was China, and it purported to be a manufacturer and supplier of ball bearings. During the relevant period, China Jiangsu did not have a class of securities registered under the Exchange Act and did not register any offering of securities under the Securities Act. During the relevant period, China Jiangsu’s shares were quoted on the Pink Sheets.

**C. GLOBAL SENTRY’S FAILURE TO COMPLY WITH EXCHANGE ACT PROVISIONS CONCERNING TRANSFER AGENTS**

1. In at least 2008, Infinity, Cannon, and China Jiangsu issued a total of approximately 3.5 million purportedly unrestricted shares to Wheeler. Global Sentry, acting in its capacity as transfer agent, issued stock certificates in Wheeler’s name, which Wheeler’s brokerage firm credited to Wheeler’s account and from which Wheeler subsequently sold the shares. Specifically, Global Sentry failed to comply with the Exchange Act and related rule provisions as follows:

a. Section 17(a)(1) of the Exchange Act requires, in relevant part, that “[e]very . . . registered transfer agent . . . shall make and keep for prescribed periods such records, furnish such copies thereof, and make and disseminate such reports as the Commission, by rule, prescribes as necessary or appropriate in the public interest, for the protection of investors, or otherwise in furtherance of the purposes of this [Act].” Section 17A(d)(1) of the Exchange Act provides, in relevant part, that “[n]o . . . registered transfer agent shall, directly or indirectly, engage in any activity as . . . [a] transfer agent in contravention of such rules and regulations [] as the Commission may prescribe as necessary or appropriate in the public interest, for the protection of investors, or otherwise in furtherance of the purposes of [the Act]. . . .” Pursuant to this authority, the Commission adopted Rules 17Ad-6, 17Ad-7, 17Ad-10, 17Ad-19 and 17Ac2-2.

b. Exchange Act Sections 17(a)(1) and 17A(d)(1) and Rule 17Ad-6(c) thereunder require that, “every registered transfer agent which, under the terms of its agency, maintains securityholder records for an issue shall, with respect to such issue, retain each cancelled registered bond, debenture, share, warrant or right, other registered evidence of indebtedness, or other certificate of ownership and all accompanying documentation, except legal papers returned to the presentor.” Under these provisions, Global Sentry was required to maintain cancelled stock certificates. Global Sentry admitted that it is “not in possession of any documentation concerning Wheeler . . . .” Global Sentry failed to maintain cancelled stock certificates relating to the sale of Infinity, Cannon, and China Jiangsu shares issued to Wheeler as required under Rule 17Ad-6.

c. Exchange Act Sections 17(a)(1) and 17A(d)(1) and Rule 17Ad-7(d) thereunder require that “the records required under Rule 17Ad-6(c) shall be maintained for a period of not less than six years . . . .” Under this Rule, to the extent that Global Sentry failed to maintain documents as required under 17Ad-6(c) identified in paragraph b. above, Global Sentry was required to maintain cancelled Infinity, Cannon, and China Jiangsu stock certificates that it issued to Wheeler for not less than six years. Global Sentry admitted that it is “not in possession of any documentation concerning Wheeler . . . .” Global Sentry failed to maintain cancelled stock certificates relating to the sale of Infinity, Cannon, and China Jiangsu shares issued to Wheeler as required under Rule 17Ad-7.

d. Exchange Act Sections 17(a)(1) and 17A(d)(1) and Rule 17Ad-10(a)(1) thereunder require that “[e]very recordkeeping transfer agent shall promptly and accurately post to the master securityholder file debits and credits containing minimum and appropriate certificate detail representing every security transferred, purchased, redeemed or issued; *Provided, however,* That if a security transferred or redeemed contains certificate detail different from that currently posted to the master securityholder file, the credit shall be posted to the master securityholder file and the debit and related certificate detail shall be maintained in a subsidiary file until resolved.” Rule 17Ad-10(b) requires that “every recordkeeping transfer agent shall maintain and keep current an accurate master securityholder file. . . .” Global Sentry admitted that it is “not in possession of any documentation concerning Wheeler . . . .” Global Sentry failed to maintain accurate “master securityholder files” as required under Rule 17Ad-10.

e. Exchange Act Sections 17(a)(1) and 17A(d)(1) and Rule 17Ad-19(b) thereunder require registered transfer agents “involved in the handling, processing, or storage of securities certificates [to]establish and implement written procedures for the cancellation, storage, transportation, destruction, or other disposition of securities certificates.” Rule 17Ad-19(d) provides that a transfer agent “shall maintain records that demonstrate compliance with the requirements set forth” under Rule 17Ad-19. Global Sentry admitted that it is “not in possession of any documentation concerning Wheeler . . . .” Global Sentry failed to maintain records as required under Rule 17Ad-19, in particular the stock certificates relating to the transfer of Infinity, Cannon, and China Jiangsu shares issued to Wheeler.

f. Exchange Act Section 17(b)(1) requires that registered transfer agents “are subject at any time, or from time to time, to such reasonable periodic, special, or other examinations by representatives of the Commission and the appropriate regulatory agency for such persons as the Commission and the appropriate regulatory agency for such persons deems necessary or appropriate in the public interest, for the protection of investors, or otherwise in furtherance of the purposes of this title.” Global Sentry violated Section 17(b)(1) of the Exchange Act by refusing to allow an on-site examination of its transfer agent records on February 7, 2011, by the staff of the Commission’s Office of Compliance Inspections and Examinations.

g. Exchange Act Sections 17(a)(1) and 17A(d)(1) and Exchange Act Rule 17Ac2-2(a) require every transfer agent registered on December 31 to file a report covering the reporting period on Form TA-2 by March 31 following the end of the reporting period. Global Sentry has failed to make timely filings for the years ended December 31, 2008, and December 31, 2009, as required.

#### **D. VIOLATIONS**

1. As a result of the conduct described above, Global Sentry willfully violated Sections 17(a)(1), 17(b)(1), and 17A(d)(1) of the Exchange Act and Rules 17Ad-6, 17Ad-7, 17Ad-10, 17Ad-19, and 17Ac2-2 thereunder.

### **III.**

In view of the allegations made by the Division of Enforcement, the Commission deems it necessary and appropriate in the public interest that public administrative and cease-and-desist proceedings be instituted to determine:

A. Whether the allegations set forth in Section II hereof are true and, in connection therewith, to afford Respondent an opportunity to establish any defenses to such allegations;

B. What, if any, remedial action is appropriate in the public interest against Global Sentry pursuant to Section 17A(c)(3) of the Exchange Act including, but not limited to, disgorgement, if any, and civil penalties pursuant to Section 21B of the Exchange Act;

C. Whether, pursuant to Section 21C of the Exchange Act, Respondent should be ordered to cease and desist from committing or causing violations of, and any future violations of, Sections 17(a)(1), 17(b)(1), and 17A(d)(1) of the Exchange Act and Rules 17Ad-6, 17Ad-7, 17Ad-10, 17Ad-19, and 17Ac2-2 thereunder.

#### IV.

IT IS ORDERED that a public hearing for the purpose of taking evidence on the questions set forth in Section III hereof shall be convened not earlier than 30 days and not later than 60 days from service of this Order at a time and place to be fixed, and before an Administrative Law Judge to be designated by further order as provided by Rule 110 of the Commission's Rules of Practice, 17 C.F.R. § 201.110.

IT IS FURTHER ORDERED that Respondent shall file an Answer to the allegations contained in this Order within twenty (20) days after service of this Order, as provided by Rule 220 of the Commission's Rules of Practice, 17 C.F.R. § 201.220.

If Respondent fails to file the directed answer, or fails to appear at a hearing after being duly notified, the Respondent may be deemed in default and the proceedings may be determined against it upon consideration of this Order, the allegations of which may be deemed to be true as provided by Rules 155(a), 220(f), 221(f) and 310 of the Commission's Rules of Practice, 17 C.F.R. §§ 201.155(a), 201.220(f), 201.221(f) and 201.310.

This Order shall be served forthwith upon Respondent personally or by certified mail.

IT IS FURTHER ORDERED that the Administrative Law Judge shall issue an initial decision no later than 300 days from the date of service of this Order, pursuant to Rule 360(a)(2) of the Commission's Rules of Practice.

In the absence of an appropriate waiver, no officer or employee of the Commission engaged in the performance of investigative or prosecuting functions in this or any factually related proceeding will be permitted to participate or advise in the decision of this matter,

except as witness or counsel in proceedings held pursuant to notice. Since this proceeding is not “rule making” within the meaning of Section 551 of the Administrative Procedure Act, it is not deemed subject to the provisions of Section 553 delaying the effective date of any final Commission action.

By the Commission.

Elizabeth M. Murphy  
Secretary