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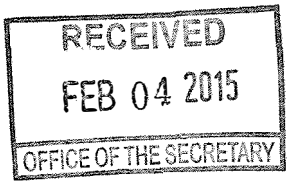
UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



In the Matter of

IMMUNOTECH LABORATORIES, INC.

Administrative Proceeding
File No. 3-16321

DIVISION OF ENFORCEMENT'S OPPOSITION TO PETITIONER IMMUNOTECH LABORATORIES, INC.'S OPENING BRIEF IN SUPPORT OF ITS PETITION FOR TERMINATION OF TRADING SUSPENSION

Respectfully submitted,
DIVISION OF ENFORCEMENT
By its attorneys:

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Dated: February 3, 2015

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INTRODUCTION

The Division of Enforcement ("Division") hereby submits this brief in Opposition to Petitioner Immunotech Laboratories, Inc.'s ("Petitioner" or "Immunotech") Opening Brief in Support of Its Petition for Termination of Trading Suspension ("Pet. Brief").

PROCEDURAL HISTORY

On November 20, 2014, pursuant to Section 12(k) of the Securities Exchange Act of 1934 ("Exchange Act") , the Commission temporarily suspended trading in four companies including Immunotech (ticker sign IMMB) through December 4, 2014 ("Trading Suspension Order"). *See Bravo Enterprises Ltd.*, Securities Exchange Act Release No. 73650, 2014 WL 6480286 (Nov. 20, 2014); *Bravo Enterprises Ltd.*, 2014 WL 6480308 (Nov. 20, 2014). The Commission suspended trading because it "appear[ed] to the Securities and Exchange Commission that there is a lack of current and accurate information concerning the securities of the issuers listed below." *Id.* Specifically as to Immunotech the Commission stated: "Questions have arisen concerning the accuracy and adequacy of publicly disseminated information, including information about the relationship between the company's business prospects and the current Ebola crisis." Further, the "Commission is of the opinion that the public interest and the protection of investors require the suspension of trading." *Bravo Enterprises Ltd.*, 2014 WL 6480308, at *1.

Following the entry of the trading suspension, staff of the Division conveyed to Immunotech's counsel the bases for the trading suspension. (Second Wash Aff. ¶ 5 attached as Exhibit 1.) In response, on December 1, 2014, pursuant to the Commission's Rules of Practice 550, Immunotech petitioned the Commission for termination of the Trading Suspension Order ("Petition"). In accordance with Rule of Practice 550(b) on December 19, 2014, the

Commission issued an Order Requesting Additional Written Submissions ("Briefing Order"). (12/1/2014 Order, AP File 3-16321.)

Pursuant to the Briefing Order, on January 5, 2015, the Division filed all the information that was before the Commission at the time of the Trading Suspension Order except privileged legal analysis or sensitive information about the staff's investigative methods. (Petitioner's Annex to Opening Brief ("Pet. Annex") C.) On January 20, 2015, Immunotech filed its opening brief and appendix.

STATEMENT OF FACTS

A. Issuer Background

Immunotech is a Nevada corporation with its principal place of business in Monrovia, California that is purportedly engaged in the development of certain proteins for use in the treatment of HIV/AIDS. (Pet. Brief at 5.) Prior to its purported involvement in the drug industry, Immunotech claimed to be developing media products for the marketing and entertainment industries under three different corporate names. Immunotech (then known as EarthNetMedia, Inc.) filed a Form SB-2 registration statement that went effective in November 2001 for an offering of shares and warrants. (Earthnetmedia, Inc. SB-2, http://www.sec.gov/Archives/edgar/data/1137117/000109230601000074/0001092306-01-000074-0001.txt.) Following the offering, Immunotech filed reports with the Commission pursuant to Exchange Act Section 15(d) [15 U.S.C. §78o(d)] until January 1, 2002, when its Section 15(d) reporting obligation was automatically suspended by operation of law because there were fewer than 300 record holders of its common stock. (Filing list, http://www.sec.gov/cgi-bin/browse-edgar?action=getcompany&CIK=0001137117&type=&dateb=&owner=exclude&start=80&count=40.) Thereafter, Immunotech reported on a voluntary basis. (Pet. Brief at 5.)

Its last-filed periodic report was a Form 10-K for the fiscal year ended December 31, 2009, filed on January 5, 2011. (Immunotech' s 2009 Form 10-K, http://www.sec.gov/Archives/edgar/data/1137117/000101738611000003/0001017386-11-000003-index.htm.) Immunotech's common stock (ticker "IMMB") is quoted on the OTC Pink marketplace on OTC Link operated by OTC Markets Group, Inc., and it has posted certain corporate information on OTC Link's website. (OTC Link, http://www.otcmarkets.com/stock/IMMB/quote.) As of October 31, 2014, Immunotech's securities had eight market makers and were eligible for the "piggyback" exception of Exchange Act Rule 15c2-11(f)(3).

According to the licensing agreement attached to the Form 10-K filed with the Commission and later attached to Petitioner's Petition and Brief, Immunotech entered into an exclusive licensing agreement effective as of September 1, 2008[1], with a trust for the benefit of the children of its current president, Harry Zhabilov ("Zhabilov Trust") for the licensing of patents related to the use of Irreversible Pepsin Fraction ("IPF") ("licensing agreement").[2] According to Immunotech, its "IPF is a peptide molecule that has a strong affinity to bind with the HIV virus' peptide components." The licensing agreement, which was attached to Immunotech's last Form 10-K (for the fiscal year ended December 31, 2009) filed with the Commission, specifically limits the scope of the licensing rights from the Zhabilov Trust to

[1] In its December 13, 2013 Annual Report filed on OTC Link, Immunotech stated that it had entered into the licensing agreement as of January 2009. (Immunotech 2009 Form 10-K .) However, the signed agreement is effective as of September 2008. (Annex A.)

[2] Zhabilov appears to have patented two proteins specifically for use in the detecting, preventing and treating of HIV. (Annex B at Recitals; Ex. 2 and Ex. 3) However, in 2008, at the time that the licensing agreement became effective, neither of these patents had been approved. (*Id.*). In fact the licensing agreement only references a patent *application*. (Annex A at Recital 2.) The licensing agreement contemplated that it would cover "licensed patents" that would be listed in an "Exhibit D." (Annex A at § 1.1 "licensed patents" & § 2.1.) The Division was unable to discover an Exhibit D included in any version of the Licensing Agreement including both copies filed as exhibits before the Commission. Only in the amendment to the licensing agreement, entered into as of September 22, 2014, are the patents referenced as part of the license (Pet. Annex B at Recitals.). Thus, arguably, Immunotech lacked rights to the patents until the September 22, 2014 amendment.

patents and patent applications "related to IPF **specific to the HIV/AIDS treatment ONLY."** (Emphasis in original.)[3] (Pet. Annex A at 2.3.)

On August 15, 2014, Immunotech posted a document on OTC Link's website entitled Interim Financial Report for Quarter Ended June 30, 2014 ("2014 Interim Financial Report") that included unaudited financial statements reporting that the company had only one full-time employee (its president Zhabilov), had losses, no revenues or cash, and had total liabilities of almost $5 million. (otcmarkets.com/financialReportViewer?symbol=IMMB&id=125161.)

According to the Petitioner's Brief (without support), Immunotech has held four pilot studies in Tijuana Mexico that tested the effectiveness of the IPF compound that showed positive results particularly in with regard to later stage AIDs patients. (Pet. Brief at 7.) However, in interviews in February-March 2013 with Financial Industry Regulatory Authority ("FINRA") staff, Zhabilov explained that Immunotech's treatment was administered to five "salvage patients"; patients who cannot use any treatment available on the market. (Second Wash Aff. ¶ 3.) During the interviews Zhabilov admitted that he had not determined whether those patients were truly "salvage patients." Moreover, he admitted that, although the study was to run for five months, the patients stopped coming for their treatment after the second or third month. This failure to complete trial thereby puts the trial's "success" in question. (*Id.*)

B. Press Releases

In October 2014, Immunotech issued two press releases concerning disease therapies based on its patented IPF proteins that went beyond the scope of HIV/AIDS treatment. On October 9, 2014, Immunotech reported it had entered into negotiations with a Zimbabwean company, Uldic Investment Pvt. Ltd. ("Uldic"), to pursue the development of its treatments in

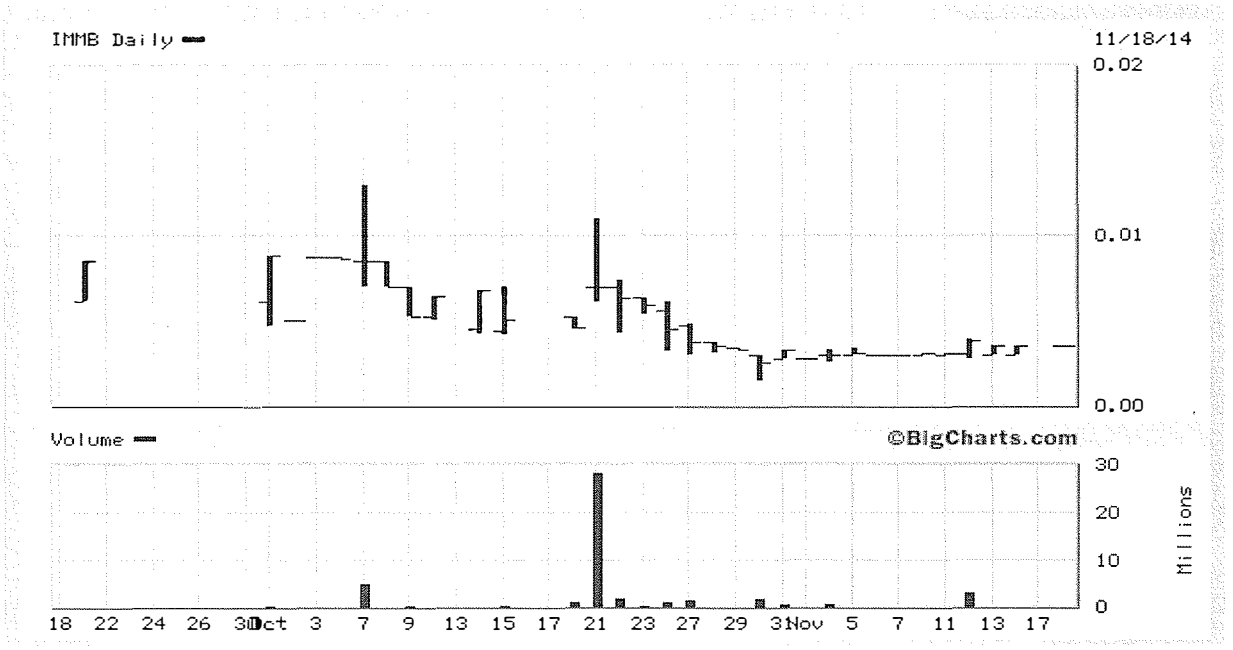
[3] In fact, the parties considered this limitation so important to the agreement that it appears at least six times in the licensing agreement, always in bold. (Annex A at Recitals 2; 1.1 definitions of "know how ", "license", "licensed patents,", and "product"; and 2.3 Negative Covenants.)

Africa. (Attached as Ex. 4.) This press release was followed by one on October 21, 2014, wherein Immunotech announced it had completed negotiations with Uldic to, among other things, pursue the development of market opportunities related to "the deadly Ebola virus" in Sub-Saharan Africa and to conduct human clinical trials in Africa. (Attached as Ex. 5.)[4]

Information provided to the staff by the Zimbabwean Securities and Exchange Commission ("ZSEC") showed that Uldic was incorporated in Zimbabwe in 2005 and is a dormant shell company with no operations. (Second Wash Aff. ¶ 4.) In the October 21 press release, Immunotech described the Ebola virus as a "new potential initiative" for its treatments and conveyed that its patented proteins were developed and could be used to treat diseases beyond HIV-AIDS even though the patent itself references only HIV/AIDS. Immunotech noted that, while the majority of its studies have focused on the potential of ITV-1 as a vaccine, ITV-1 could also be used as a potential immune-therapeutic drug to treat other infectious diseases.

During the period August 1, 2014 through October 21, 2014, Immunotech's last share price fluctuated between a low of $0.0001 per share and a high of $0.025 per share on average daily volume of 506,000 shares. The October 21 press release specifically addressing the Ebola virus resulted in a 52% increase in share price from $0.0046 per share to $0.007 per share. The volume rose sharply from 1.4 million shares to 28.5 million shares, a 1,831% increase. A chart reflecting the price and volume fluctuations for Immunotech during the past two months is included below.

[4] Attached as an exhibit to this brief is the October 21, 2014 press release. In its brief Petitioner refers to an October 24, 2014 press release that was not attached as an exhibit. In its original petition to the Commission Petitioner attached a "October 19, 2014" press release. However, it appears both from the October 19, 2014 press release attached to the petition as well as the discussion in Petitioner's brief that both parties are addressing the identical press release substantively.



(*Id.*)

ARGUMENT

As the Petitioner has recognized, Congress has conferred upon the Commission the right to impose a time-limited trading suspension. *SEC v. Sloan*, 436 U.S. 103, 112 (1978). In adopting Rule of Practice 550, the rule governing summary suspensions pursuant to Section 12(k)(1)(A) of the Exchange Act the Commission stated:

> The usual purpose of a suspension is to alert the investing public that there is insufficient public information about the issuer upon which an informed investment judgment can be made or that the market for the securities may be reacting to manipulative forces or deceptive practices. Consequently, the primary issues normally to be considered by the Commission in determining whether or not a 10-day suspension should be instituted are whether or not there is *sufficient public information upon which to base an informed investment decision or whether the market for the security appears to reflect manipulative or deceptive activities*.

Rules of Practice, 60 FR 32738-01 (emphasis added).

Recently, the Commission's Office of Investor Education and Advocacy issued an investor bulletin regarding trading suspensions detailing the circumstances that might lead it to suspend trading including:

> 1) A lack of current, accurate, or adequate information about the company, for example, when a company is not current in its filings of periodic reports; 2) Questions about the accuracy of publicly available information, including in company press releases and reports, about the company's current operational status, financial condition, or business transactions; and 3) Questions about trading in the stock, including trading by insiders, potential market manipulation, and the ability to clear and settle transactions in the stock.

Investor Bulletin: Trading Suspensions, sec.gov/investor/alerts/tradingsuspensions.pdf (May 2012).

The Commission has previously ordered trading suspensions pursuant to Section 12(k) where it appeared likely that manipulative activity was occurring in a U.S. penny-stock. *See, e.g., In the Matter of Press Ventures, Inc.*, Exchange Act Release No. 34-70771 (Oct. 30, 2013) (suspected manipulative activity in company's security). The Commission has also ordered trading suspensions where investors were at risk because of a lack of accurate information concerning a company's securities and there were questions as to the accuracy of public statements about the company or its stock. *See, e.g., In the Matter of American Pacific Rim Commerce Group et al.*, Exchange Act Release No 34-64612 (June 7, 2011) (suspending trading in 17 microcap stocks because of questions about the adequacy of publicly available information).

Here, the Commission expressed concerns regarding the accuracy and adequacy of publicly disseminated information including information related to the relationship between Immunotech's business prospects and Ebola. Also before the Commission was information regarding trading in Petitioner's securities that raised concerns regarding possible manipulation in the security. (Pet. Annex C, Wash Aff. ¶ 12.) Contrary to Petitioner's arguments, at the time of the suspension Immunotech's stock presented both concerns. Moreover, none of Petitioner's

arguments before the Commission in any way ameliorates those concerns and, in fact, continues to highlight the issues that caused the Commission to order the trading suspension.

Immunotech makes three arguments to terminate the trading suspension: 1) the Petitioner's IPF-based therapies are believed to have applicability to the treatment of Ebola; 2) ULDIC is a real company; and 3) the Commission has no evidence that Immunotech was responsible for any suspicious trading. As detailed below, none of these arguments are availing.

A. Whether Immunotech's IPF-Based Therapies are Believed to Have Applicability to the Treatment of the Ebola Virus is Irrelevant as to Whether Public Lacked Sufficient Information to Make an Informed Investment Decision

1. Investing Public Lacked Information to Determine Whether Immunotech Could Use Patents in Connection with Ebola.

Petitioner argues that a trading suspension was unwarranted because, contrary to the Commission's assertion that the Petitioner's license was limited to use in connection with HIV, *see supra at* 3-4, it, in fact, had been amended on September 22, 2014, to include all infectious diseases. (Pet. Brief at 10 & Pet. Annex B.) However, assuming that the document "Amendment to Exclusive Licensing Agreement between the Zhabilov Trust and Immunotech Laboratories, Inc." ("Amendment") is an authentic legal document amending the original licensing agreement, Petitioner does not contend that the Amendment had been publicly available when the Commission ordered the trading suspension.[5] One of the Commission's stated purposes in ordering a trading suspension is to ensure sufficient information for an investment decision to be made. In this case, at the time of the suspension, interpreting the facts in the best light for Petitioner, the publicly available information was contradictory. On one hand, it had issued press releases indicating that it was exploring the use of licensed technology in the treatment of Ebola. On the other hand, it attached a licensing agreement to its Form 10-K

[5] The Division has also done a diligent search of publicly available materials and was unable to find any information publicly available regarding the amendment. (Wash Aff. ¶ 6.)

that clearly stated that it was prevented from exploring its use outside of HIV/AIDS. The Commission, by ordering the trading suspension, caused Immunotech to publicly disclose the purported amendment through the petition process thereby clarifying for the potential investor, that it was supposedly free to explore the use of technology that it had licensed in not only the treatment of HIV/AIDS but also Ebola.

2. The October 24, 2014 Press Release Represented to the Public that Immunotech Was Exploring "Marketing Opportunities" Related to Ebola – Not Research.

The Petitioner attempts to limit the misleading nature of the October 24, 2014 press release by arguing that "it only indicates the Petitioner's intent to embark upon further research concerning the applicability of its technology to the Ebola virus as well as to further its HIV/AIDS research." Petitioner contends that no reasonable reader could believe that the Petitioner has already tested its technology on Ebola patients. However, the press release instead indicates the company had successfully concluded negotiations with ULDIC "to pursue the development of "market opportunities related to the deadly Ebola virus." (Ex. 5.) Elsewhere in the press release, Immunotech stated that parts of Africa allowed for experimental treatments and that "Immunotech expects that it can *market* its treatment for infection diseases through the Company's new agreement with ULDIC." (Emphasis added.) Thus, the press release suggested to the investor making an investment decision that the company had treatments ready to market in Africa —a fact that Petitioner itself admits is untrue.[6] (Pet. Brief at 9-10.)

B. Regardless of whether ULDIC is a Legitimate Company, Immunotech's Agreement with ULDIC Was Not as Represented in the Press Release.

Petitioner also argues that the trading suspension was unwarranted because, contrary to the Division's representations to the Commission, Petitioner entered into an agreement with ULDIC

[6] Moreover, in an October 22, 2014 FINRA interview, Zhabilov admitted that IPF is not effective against Ebola itself, but rather could only serve as a protein additive to vaccines for general antibody purposes. (Second Wash Aff. 3.)

– a company that as far as it could tell was a viable active company. (Pet. Brief at 10-11.) Petitioner's argument is unavailing. Even assuming *arguendo* that ULDIC is a viable company with an experienced leader – a bald assertion supported by no extrinsic evidence[7] – Petitioner's press release misrepresented the nature of the agreement between ULDIC and Immunotech.

In the October 21, 2014 press release, Immunotech stated that it entered into an agreement with ULDIC to conduct human clinical trials using the Company's HIV/AIDS and Hepatitis C virus treatment as well as to develop market opportunities related to Ebola. (Ex. 5.) The actual agreement between ULDIC and Immunotech, however, failed to mention developing marketing opportunities regarding Ebola treatments – a treatment that Immunotech lacked. Moreover, the agreement between ULDIC is limited to marketing a HIV/AIDS and/or Hepatitis C treatment. In the agreement ULDIC states that it has expertise in developing demand and sales for the treatment and the contract detailed ULDIC's future efforts to create a distribution network for the treatment.[8] (Pet. Annex D Sections 1.04.01.) The agreement fails to mention that ULDIC had any expertise in conducting clinical trials. At best, the agreement reflects that ULDIC allegedly intended to reach out to clinical research centres to generate demand. Thus, the press release was arguably misleading.

C. Incomplete and/or Misleading Press Releases Appear to Have Led to Spikes in Trading.

Finally, the Petitioner argues that the Trading Suspension was in error, because it was not responsible for any suspicious trading or touting of its securities. It contends that it is not

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[7] The Division had received evidence from the Zimbabwe Securities and Exchange Commission that ULDIC is a dormant shell company. (Pet. Annex C Wash Aff. ¶ 11.) Immunotech has provided no evidence that ULDIC is a functioning company other than its statements in its brief that it exists and that supposedly it negotiated a preliminary agreement with Synexa Life Sciences – an agreement evidenced by a one page unauthenticated letter written "to whom it may concern." (Pet. Annex E.)

[8] Although the Division, for the purposes of this filing, gave the Petitioner the benefit of the doubt as to the authenticity of the contract, its terms strain credulity. ULDIC and Immunotech agreed that ULDIC, a company in Zimbabwe, would create a distribution network throughout Africa as well as Australia and New Zealand.

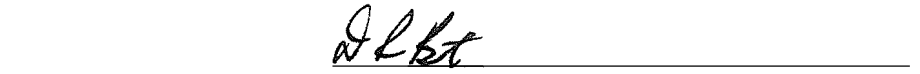
unusual "to see increased volume and share price in the event of favorable news...." (Pet. Brief at 12.) Petitioner contends that it cannot be held accountable for increases in volume when the disclosure is accurate. Petitioner misses the point. First, as explained previously some of its disclosures were not accurate and were, arguably misleading. Second, and more importantly, for the Commission to order a trading suspension, it need not conclude that the issuer caused the potentially suspicious trading or market manipulation. Instead, for purposes of determining the need for a suspension, there only needs to be the appearance of manipulative forces or deceptive practices. Here, after the issuance of an arguably deceptive press release on October 21, 2014, the stock price increased 52% from $ 0.0046 to $0.007 per share. The volume also rose sharply from 1.4 million shares to 28.5 million shares, a 1,831% increase. Accordingly, the price and volume spikes here appear to have resulted from Petitioner's release of misleading information. However, whether the spike was the result of action by the company or by outsiders, huge percentage increases in trading and volume are indicative of possible manipulative activity in the market for Petitioner's security. Such activity is sufficient to warrant a trading suspension.

CONCLUSION

For the reasons stated above, the Division requests that the Commission not "retroactively" terminate the trading suspension that issued on November 20, 2014.[9]

Respectfully submitted,

DIVISION OF ENFORCEMENT,
By its attorneys,



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Dated: February 3, 2015

[9] Petitioner requests that that the Commission retroactively terminate the suspension. However, it provides no authority that the Commission may take such action. In fact, as a practical matter because the suspension ended on December 4, 2014, it would appear that the Petitioner's action is moot.

EXHIBIT 1

TAB

1

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

In the Matter of **IMMUNOTECH LABORTORIES, INC.,**	**Administrative Proceeding** **File No. 3-16321**

AFFIDAVIT OF J. LAUCHLAN WASH

I, J. Lauchlan Wash, hereby swear:

1. Since November 1995, I have been employed as an enforcement attorney with the U.S. Securities and Exchange Commission (the "Commission") in the Boston Regional Office in the Division of Enforcement ("Division"). My duties include conducting investigations related to potential violations of the securities laws. I was the lead investigator for the Division in this matter.

2. On November 18, 2014, the Division provided the following factual information to the Commission in support of the issuance of the Trading Suspension Order temporarily suspending trading in the securities of Immunotech Laboratories, Inc. ("Immunotech"), ticker symbol "IMMB." The Division did not have other communications with the Commission concerning the factual basis in support of the issuance of the Trading Suspension Order.

3. Prior to the Division's confidential communication to the Commission of November 18, 2014, I reviewed confidential referrals to the Division from the Financial Industry Regulatory Authority (FINRA) dated April 23, 2013 and October 31, 2014 concerning Immunotech. These FINRA referrals indicate that in February and March 2013, staff from FINRA's Fraud Surveillance Section engaged in a series of communications with Immunotech's

CEO, Harry Zhabilov. Among the topics discussed were purported studies on humans conducted in Mexico by Immunotech. According to the FINRA referrals, Zhabilov stated that Immunotech had arranged for its treatment to be administered to five purported "salvage" patients (patients who cannot use any treatment available on the market) but which Immunotech had not verified were in fact salvage patients. According to the FINRA referrals, Zhabilov stated that while the purported Mexican salvage patients showed up to one or two appointments to receive treatments as part of a six month program of treatment, they all had failed to continue the treatments after the second or third month. According to the FINRA referral dated October 31, 2014, Zhabilov stated in a FINRA staff interview on October 22, 2014, that ITV-1 is not designed to treat or prevent the spread of Ebola treatment. Instead, Zhabilov claimed that a protein within ITV-1, Inactivated Pepsin Fraction, is a protein that could possibly be added to Ebola vaccines for anti-body purposes.

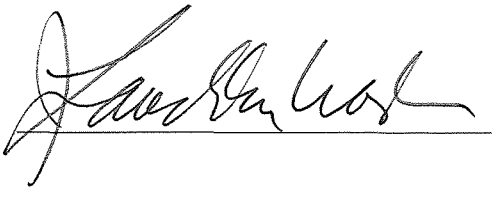
4. Prior to the Division's confidential communication to the Commission of November 18, 2014, I received documentation provided by the Securities and Exchange Commission of Zimbabwe from the Zimbabwean Registrar of Companies indicating that Uldic Investments Ltd. ("Uldic"), was incorporated on January 31, 2005 and whose last filed annual return (as of February 2009) showed no annual returns.

5. On November 20, 2014, following the entry of the Immunotech trading suspension, my supervisor and I spoke with Adam Tracy, counsel for Immunotech. We informed Mr. Tracy that the trading suspension was based on, among other things, the Commission's concerns about the accuracy and adequacy of the information concerning: (1) Immunotech ability to capitalize on an Ebola treatment given the patents and licensing agreement seemed limited to treating HIV/AIDS, (2) how Immunotech would be able to fund

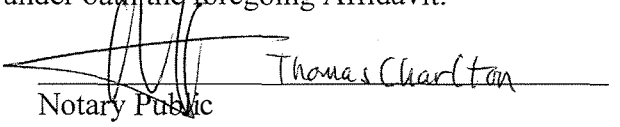
any development of the patents and licensing agreement given its financial condition, and (3) that it appeared that Uldic was a shell company.

6. Prior to the Division's confidential communication to the Commission of November 18, 2014, I also conducted various Internet searches to determine what information was publically available concerning Immunotech and did not notice any reference to a modification to Petitioner's licensing agreement effective as of September 1, 2008. In response to Immunotech introduction of the document entitled "Amendment to Exclusive Licensing Agreement between the Zhabilov Trust and Immunotech Laboratories, Inc. ("Amendment") in this proceeding, I conducted additional general Internet searches, searches in LEXIS/NEXIS's English Language News (most recent two years) file which includes various business wire services, and on OTC Market where Immunotech has posted certain corporate information and I was unable to locate any reference to the purported Amendment.

Dated: 2/3/2015



On February 3, 2015, James Lauchlan Wash, a person known to me, personally appeared before me and swore under oath the foregoing Affidavit.



Notary Public
Commission expires:

Commonwealth of Massachusetts
On this 3 day of February 2015,
personally appeared before me, and proved to me through satisfactory evidence of identification, which were Drivers License to be the person whose name is signed on the preceding or attached document in my presence.

THOMAS G. CHARLTON, Notary Public
My Commission Expires August 20, 2021

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ENFORCEMENT DIVISION

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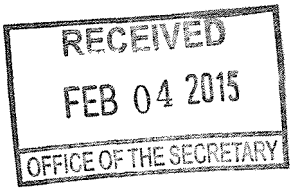
February 3, 2015

By FACSIMILE AND UPS



Brent Fields, Secretary
Office of the Secretary
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: *In the Matter of Immunotech Laboratories, Inc.*
Administrative Proceeding File No. 3-16321

Dear Mr. Fields:

Enclosed for filing in the above-referenced administrative proceeding, please find an original and three copies of the filing entitled "Division of Enforcement's Opposition to Petitioner Immunotech Laboratories, Inc.'s Opening Brief in Support of its Petition for Termination of Trading Suspension"

Thank you for your attention to this matter.

Sincerely,

Deena Bernstein
Senior Trial Counsel

Enclosure
cc: Service List