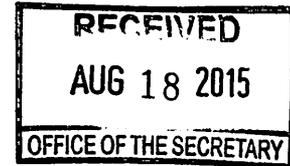


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-16596



In the Matter of)
)
)
Oraco Resources, Inc.,)
SaviCorp)
 (a/k/a SaVi Media Group, Inc.),)
Smoky Market Foods, Inc.)
Soltera Mining Corp.)
Wolverine Holding Corp.)
 (a/k/a/ Mobility Plus Medical Equipment, Inc.))
)
 Respondents.)

RESPONSE AND BRIEF OF SOLTERA MINING CORP. IN OPPOSITION TO THE
DIVISION OF ENFORCEMENT'S MOTION AND BRIEF FOR SUMMARY
DISPOSITION

Table of Contents

Table of Authorities	3
I. Response to Motion for Summary Judgment	4
II. Response to Statement of Facts	4
III. The Law - Brief	8
IV. Conclusion.	10

Table of Authorities

Cases

<i>China Biotics, Inc.</i> 2013 SEC LEXIS 3451 *44.	9
<i>Gateway International Holdings, Inc.</i> , Securities Exchange Act 1934 Rel No. 53907, 2006 SEC LEXIS 838 (April 10, 1997).	8

Statutes

Nev. Rev. Stat. 78.330	7
Nev. Rev. Stat. 78.340	7
Nev. Rev. Stat. 78.345	7
Securities Exchange Act of 1934 Section 12(j)	5, 6, 8
Securities Exchange Act of 1934 Section 13(a)	8
Securities Exchange Act of 1934 Section 14(a)	7
Securities Exchange Act of 1934 Section 14(c)	7

Rules

Federal Rules of Civil Procedure 56	8
Securities Exchange Act of 1934 Rule 13a-1	8
Securities Exchange Act of 1934 Rule 13a-13	8

Other Authorities

Oraco Resources Inc., et al. Exchange Act Release No. 75183 Commission File No. 500-1 (June 17, 2015)	7
Section 2.2 of the Bylaws of Soltera Mining Corp.	7

I. RESPONSE TO MOTION FOR SUMMARY JUDGMENT

Soltera Mining Corp., a Nevada corporation, (“Soltera”) objects to the granting of a order of summary judgment revoking the registration of Soltera’s common stock for the reason that there are genuine issues of fact which prevent this court from granting summary judgment at this time.

II. RESPONSE TO STATEMENT OF FACTS

Soltera is no longer delinquent in its periodic filings with the Commission having filed on August 17, 2015, its delinquent Form 10-K for the period ending October 31, 2014. (See Soltera filings on EDGAR website).

Soltera admits that in the past it failed to meet its obligation to file timely reports. Internal problems at Soltera resulted in the reports being filed timely. Those problems have been corrected.

A new law firm has been retained to assist Soltera with reporting obligations. That law firm is The Law Office of Conrad C. Lysiak, P.S. who brings 43 years of SEC experience with reporting (See Declaration of Fabio Montanari at paragraph 8).

Soltera will continue to retain Rene Daignault, attorney at law to assist with SEC filings. (See Declaration of Fabio Montanari at paragraph 8 and Declaration of Rene Daignault).

Filed herewith is the Declaration of Waseem Javed of Manning Elliott LLP, our auditors. At the time the Mr. Javed’s Declaration was executed, Manning Elliott was auditing the October 31, 2014 financial statements of Soltera. As noted in the Mr. Javed’s Declaration, he states,

“There does not appear to be any impediment to the release of our audit opinion of the year ended October 31, 2014”. The audit opinion was then released. The point is that Manning Elliot LLP has been Soltera’s auditor since inception. With Soltera’s timely delivery of financial information to Manning Elliott LLP there will be no impediment to the timely release of an audit opinion or the review of quarterly financial information. As set forth in the Declaration of Fabio Montanari at paragraph, “... funds are available to assure on going future reporting obligations.”

Reference is made to the Declaration of Fabio Montanari which explains the history of reporting issues with the SEC. It clearly centers around the board of directors not making sufficient funds available to cover the costs of reporting. That problem has been solved and The Law Office of Conrad C. Lysiak, P.S. has implemented a program to assure timely filing for Soltera.

Not revoking Soltera’s registration will be in the best interest of the public as well as existing shareholders of Soltera because Section 12(j) proceedings destroy shareholder value. Once these proceedings are instituted, the SEC staff is unwilling to dismiss them. The result is that shareholders may suddenly find themselves holding shares that they can no longer sell on the open market and effectively imposing the “death penalty” against these public companies.

There are a number of other facts the SEC elected not to consider:

1. All of the officers and directors of Soltera were physically located outside the United States of America. (See any of the last four Form 10-Ks filed by Soltera).
2. No officer or director, with the exception of Kevan Ashworth, spoke English as a first language; Mr. Ashworth having since resigned. (Paragraph no. 8 of Declaration of Fabio Montanari).

3. Soltera, has brought its reporting obligations current with the SEC. (See reports filed on EDGAR and SEC brief at page 5).
4. Section 12(j) proceedings destroy shareholder value. The result is that shareholders suddenly find themselves holding shares that they can no longer sell on the open market and effectively imposing the “death penalty” against these public companies. The ones who will be injured will be innocent investors.
5. Soltera has retained the services of The Law Office of Conrad C. Lysiak, P.S. to assist with the preparation and filing of all future reports with the SEC. Mr. Lysiak has 43 years experience in dealing with securities law matters. (See paragraph no. 8 of Fabio Montanari).
6. The mining industry is cost intensive with the likelihood of success being questionable. Currently the mining industry is depressed on a worldwide basis. The search for new sources of natural resources is an ongoing quest and is necessary to assure our worldwide society receives adequate natural resources to allow it to maintain a sufficient standard of living. Raising capital for mining exploration and production has become significantly challenging. (See paragraph no. 16 of Declaration of Fabio Montanari).
7. There is no basis alleged by the Commission for the revocation of Soltera’s common stock other than the failure to timely file its reports under Section 13 of the Exchange Act. There are no allegations of fraud, improper market activities, dissemination of misleading press releases, or any allegation of any kind that the information contained in any reports filed with the Commission

is inaccurate. In short all of the information filed is accurate and permits investors to make informed decisions. (See Order Instituting Administrative Proceedings - SEC Release 75183).

8. On June 17, 2015, the Commission entered a temporary order of trading suspension which effectively prevents Soltera's stock from trading and thereby eliminates the need for the revocation or suspension of the Soltera's common stock in this proceeding. (See Order of Trading Suspension entered June 17, 2015 - File No. 500-1).
9. The SEC allegations regarding that Soltera failed to comply with Exchange Act Sections 14(a) and/or 14(c) are inaccurate and unsupported by any evidence.
10. Soltera stipulates it has not held an annual meeting of shareholders since March 16, 2005. Under Soltera's bylaws at *Article, Section 2.2 - Annual Meeting* - (Declaration of David Frye, Exhibit 11, Page 5), Soltera can hold its meeting of shareholders on September 22 or "at such other time as may be set by the Board of Directors from time to time," It allows the directors to avoid holding useless annual meetings. Nevada law was designed to help start-up companies, not burden them with costly technical requirements. However, under the Nevada law (NRS 78.345), if at least 18 months have passed since the last election of directors required by NRS 78.330, the district court has jurisdiction in equity, upon application of one or more stockholders holding stock entitling them to exercise at least 15% of the voting power, to order the election of directors in a manner required by NRS 78.330. No such application has ever been filed by any

shareholder(s) of Soltera. Further, failure to hold the election of directors does not dissolve Soltera (NRS 78.340). As pointed out in the Declaration of David S. Frye in Support of the Division of Enforcement's Motion for Summary Disposition, at Exhibit 2, Soltera is in good standing with the State of Nevada, its place of incorporation, and is deemed "Active". (Exhibit 2, Page 1 of the Declaration of David S. Frye in Support of the Division of Enforcement's Motion for Summary Disposition). Further, the bylaws of the Soltera state that

11. Soltera's failure to comply with state corporation law is not a basis for the revocation of its registration under Section 12(j) of the Exchange Act. (See Section 12(j) of the Securities Exchange Act of 1934, as amended).
12. Adequate funds are available to assure continued future compliance with SEC reporting obligations. (See paragraph no. 10 of the Declaration of Fabio Montanari).

III. THE LAW - BRIEF

Summary judgment is proper if there are no issue as to any material fact. (FRCP Rule 56). However in proceedings under the Exchange Act Section 12(j) involving violations of Exchange Act Section 13(a) and Rules 13a-1 and 13a-13, the determination of "...of what sanctions will ensure that investors will be adequately protected ... turns on the effect" of the violations "on the investing public, including both the current and prospective investors, ... on one hand, and the Section 12(j) sanctions, on the other hand." *Gateway Int'l Holdings, Inc.*, Exchange Act Release No. 53907. In determining the appropriate sanction, the Commission

considers a number of factors (Gateway factors), including “the seriousness of the issuer’s violations, the isolated or recurrent nature of the violations, the degree of culpability involved, the extend to the issuer’s efforts to remedy its past violations and ensure future compliance, and the credibility of its assurances, if any, against further violations.” This list of factors “... is non-exclusive and no single factor is dispositive.” *China Biotics, Inc.*, 2013 SEC LEXIS 3451, at *44.

The foregoing factors are fact intensive and as a result, a determination cannot be made by a motion for summary disposition without first analyzing and reviewing the material facts which cannot be in controversy.

The seriousness of the violations is stipulated; the isolated or reoccurrence - there were a lot of delinquent reports; the degree of culpability rested on the problem of lack of funds; remedying the past - a new experienced law firm is involved and money to support the reporting program has been provided by the Soltera board of directors; credibility - the assurance of the new law firm; the continued support of the existing attorney; the current support of the current auditors and the president’s commitment to report on time; plus and finally, the need to allow the existing shareholders to trade their shares of Soltera.

The Declarations of Messrs. Monatanari, Daignault, Jevvard, and Lysiak must be reviewed and considered by the court. After reviewing all of the facts, the court will find that summary disposition is not the appropriate remedy. A trial is. As a result, Soltera, concurrently with the filing of this response, has filed a motion to set case for trial.

As a note, this is a court of equity. Soltera desires to not have its registration revoked. Since this is a court of equity, Soltera proposes that this matter be continued in order for Soltera

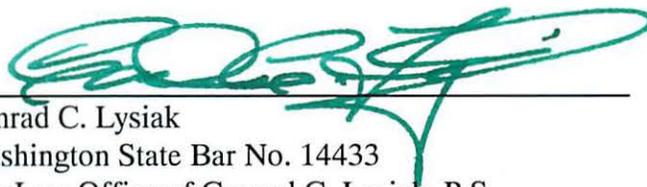
to demonstrate to the Commission that it will report on time. In the event Soltera fails to file any one of its reports on time during the next twelve months, it stipulates its registration can be revoked.

IV. CONCLUSION

Based upon the foregoing, Soltera prays that the Commission's Motion for Summary Disposition be denied and this matter be set for trial.

DATED: August 17, 2015.

The Law Office of Conrad C. Lysiak, P.S.



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CERTIFICATE OF SERVICE

I, Conrad C. Lysiak, served a true and correct copy of the above and foregoing
**RESPONSE AND BRIEF OF SOLTERA MINING CORP. IN OPPOSITION TO THE
DIVISION OF ENFORCEMENT'S MOTION AND BRIEF FOR SUMMARY
DISPOSITION** on Brent J. Fields, Secretary, Securities and Exchange Commission, 100 F
Street N.E., Washington, D.C. 20549 via Federal Express on this 17th day of August 2015; and by
email to the:

The Honorable James Grimes
Administrative Law Judge
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549
alj@sec.gov

and

David S. Frye, Esq.
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