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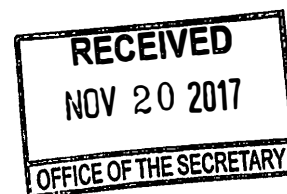


**John M. Yetter**  
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Sent Via Facsimile

September 12, 2017

Brent Fields, Secretary  
United States Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549  
Fax: 202-772-9325



**Re: *In the Matter of the Application of 6D Global Technologies, Inc.,*  
Admin. Proc. File No. 3-17908**

Dear Mr. Fields:

I write in response to yet another letter sent to the Commission on behalf of 6D Global Technologies, Inc. ("6D") in the above-captioned matter. The issue before the Commission is whether to permit 6D to proceed with its untimely application seeking Commission review of a decision by Nasdaq's Listing Council. 6D's latest letter, dated September 8, 2017, is their third submission *after* the briefing on the motion to dismiss their untimely application concluded.

In addition to rehashing the subjects of their prior two supplemental letters, 6D refers to recent developments in a Commission enforcement action against Benjamin Wey—specifically, the Commission's September 1, 2017 notification that it intends voluntarily to dismiss claims against Wey and others, and the subsequent dismissals. The SEC made this decision following a district court's suppression of evidence found during an FBI search of Wey's home. Because the SEC "believes its ability to introduce the seized evidence against certain defendants may also be affected," the SEC decided not to continue proceedings against Wey and certain other defendants. SEC September 1, 2017 Letter at 1-2.

6D still has not explained how any of the subsequent developments in the government's cases against Wey justify the company's failure to file its application for review until three months after the Commission-imposed deadline. *See, e.g.,* Nasdaq's June 26, 2017 Letter; Nasdaq's Aug. 28, 2017 Letter.

6D argues without citation that the allegations concerning Wey "were the central focus of Nasdaq's initial decision to delist 6D and poisoned the entire [delisting] process." Sept. 8, 2017

Letter at 2. As we have repeatedly pointed out, however, the Listing Council's *decision*—the decision at issue—explicitly disclaimed any reliance on “Wey’s influence over the Company.” MTD Ex. A at 13; Nasdaq’s June 26, 2017 Letter at 2; Nasdaq’s Aug. 28, 2017 Letter at 1-2. Nor can 6D square their current allegations with their prior concession—ignored once again in their latest letter—that Nasdaq “denied 6D’s delisting appeal not because of any alleged involvement by Wey.” *Puddu v. 6D Global Techs., Inc.*, No. 15-cv-8061, Dkt. 113 at 7 n.1 (S.D.N.Y. Aug. 19, 2016), cited in Nasdaq’s June 26, 2017 & Aug. 28, 2017 Letters.

After three attempts to save its untimely application, the only extraordinary circumstance here is 6D’s repeated failure to address any of the points raised by Nasdaq. This experience of repeated “supplemental” filings exemplifies, in a concrete way, why the finality served by the Commission’s rules should be respected and 6D’s untimely application should be dismissed.

Respectfully,



John M. Yetter  
Vice President and Deputy General Counsel

cc: Paula D. Schaffner  
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## CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2017, I cause a true and correct copy of the foregoing to be served on the following by facsimile:

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