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October 3, 2019

Via Email: <u>ALJ@SEC.GOV</u> and Federal Express

Honorable Carol Fox Foelak Administrative Law Judge Securities and Exchange Commission 100 F. Street, NE Washington, DC 20549-2557

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RE: In the Matter of Digital Brand Media & Marketing Group, Inc.

Dear Judge Foelak:

I write to advise the Court that Digital Brand Media & Marketing ("DBMM" or "the Company") has resolved the issues, previously raised by Enforcement, concerning language regarding its internal controls and procedures. As the Court may recall, I had advised the Court in May that DBMM had continued its timely filing of its periodic reports. I also, in July, notified the court that DBMM had filed its Form 10Q for the third quarter of 2019, on July 12, 2019.

Enforcement took the position, by filing dated June 21, 2019, that Corporation Finance had concluded that the Company's amended filings did not correct deficiencies that had previously been raised with the Company.

DBMM has, since that submission by Enforcement, continued its discussions with Corporation Finance and recently received confirmation from them that language that we had proposed was acceptable and remedied the prior deficiencies. The Company then, yesterday, filed those amendments with language.

At this point, therefore, the Company has more than a year of current filings, it has resolved the only remaining issue cited by Enforcement, and it continues to have operations and revenues. The Court will also recall that its delinquency resulted from the unusual circumstance of the SEC taking action against the Company's auditor and requiring the Company to re-audit and refile its reports. As discussed in the Company's prior submissions, there appears to be *no* precedent for revocation under these circumstances; to the contrary, the cases cited by the Company demonstrate that revocation has been denied under circumstances that are similar but, we would argue, less compelling. We again ask that the Court consider, and grant, the Company's motion for disposition and enable the Company to move forward in its growth and development.

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Thank you again for your consideration in this matter.

Respectfully submitted,

Maranda tuz Maranda E. Fritz

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