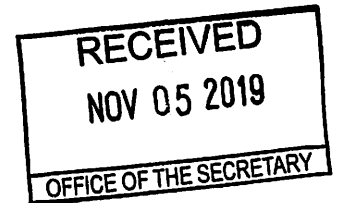


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING
File No. 3-19262

In the Matter of

Gold Lakes Corp., et al.

Respondents.

DIVISION OF ENFORCEMENT'S MOTION FOR
DEFAULT AND BRIEF IN SUPPORT

The Division of Enforcement (“Division”), by counsel, pursuant to Commission Rules of Practice Rules 154(a) and 155(a)(2) respectfully moves the Securities and Exchange Commission (“Commission”) for an order entering a default against Gold Lakes Corp. (CIK No. 1386936) (“GLLK”) and Novagen Ingenium Inc. (CIK No. 1425173) (“NOVZ”) (collectively “Respondents”) in this proceeding and ordering the revocation of the registration of each class of Respondents’ securities registered pursuant to Section 12 of the Securities Exchange Act of 1934 (“Exchange Act”).

Argument

On July 23, 2019, the Commission issued an Order Instituting Proceedings (“OIP”) against Respondents which have securities registered with the Commission under Section 12(g) of the Exchange Act. The OIP alleges the Respondents are delinquent in filing their mandated periodic reports. Because each of the Respondents failed to answer or otherwise

respond to the OIP, the Division now seeks entry of an order finding respondents GLLK and NOVZ to be in default in this proceeding.

Commission Rule of Practice 220(b) states that where an answer is required to be filed by rule or order, the respondent “shall do so within 20 days after service upon the respondent of the order instituting proceedings” unless a different period is provided by rule or order. Here, the OIP requires “an Answer [to be filed] to the allegations contained in this Order within ten (10) days after service of this Order.” OIP at IV. Commission Rule of Practice 160(a) provides that Saturdays, Sundays and Federal legal holidays are to be counted as part of the 10 day period, and Commission Rule of Practice 160(b) extends that time by three days if service is made by mail.

The Declaration of Gina Joyce to Assist Secretary with Record of Service (attached hereto as Exhibit A) (“Joyce Declaration”) establishes that on July 25, 2019, GLLK was served with the OIP, along with a letter from the Commission’s Secretary, and a letter from the Division offering discovery pursuant to Rule of Practice 230 (collectively the “Service Documents”), by Express Mail delivery at the address provided in its last EDGAR filing with the Commission, in accordance with Commission Rule of Practice 141(a)(2)(ii). GLLK’s answer was due by Wednesday, August 7, 2019. However, GLLK has not filed an answer or made any other response to the OIP in this proceeding.

The Joyce Declaration also establishes that on July 25, 2019, service upon NOVZ of the Service Documents was attempted by Express Mail delivery at the address provided in its last EDGAR filing with the Commission, in accordance with Commission Rule of Practice 141(a)(2)(ii). NOVZ’s answer was due by Wednesday, August 7, 2019. However, NOVZ has not filed an answer or made any other response to the OIP in this proceeding.

The Respondents at issue are delinquent in their filings with the Commission and have been delinquent for over two years. In addition, the Respondents' failure to answer supports revocation of the registration of each class of the Respondents' securities. Accordingly, the Division moves for an order, pursuant to Rule 155(a)(2), finding these Respondents to be in default in this proceeding and ordering that the registration of each class of their securities registered pursuant to Exchange Act Section 12 be revoked.

Conclusion

For the reasons set forth above, the Division respectfully requests that the Commission:

- 1) grant the Division's Motion; 2) enter an order of default against GLLK and NOVZ; and
- 3) revoke the registration of each class of their securities registered pursuant to Section 12 of the Exchange Act.

Dated: November 5, 2019

Respectfully submitted,

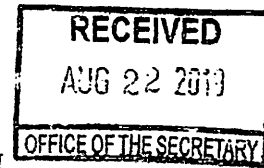


James Carlson (202) 551-3711
Gina Joyce (202) 551-4850
Securities and Exchange Commission
100 F Street, N.E., Room 5120
Washington, D.C. 20549-5010

COUNSEL FOR
DIVISION OF ENFORCEMENT

EXHIBIT A

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING
File No. 3-19262

In the Matter of

Gold Lakes Corp., *et al.*,

Respondents.

**DECLARATION OF GINA JOYCE
TO ASSIST SECRETARY WITH RECORD OF SERVICE**

GINA JOYCE, pursuant to 28 U.S.C. § 1746, declares:

1. I am a Senior Counsel with the Division of Enforcement ("Division") of the Securities and Exchange Commission, and co-counsel for the Division in the captioned administrative proceeding. I am submitting this Declaration to assist the Secretary in maintaining a record of service on the respondents in the captioned proceedings pursuant to Rule 141(a)(3).

2. Among other means, Securities and Exchange Commission ("Commission") Rule of Practice 141(a)(2)(ii) permits service on a corporation or entity by delivering a copy of an Order Instituting Administrative Proceedings ("OIP") to an agent authorized by appointment or law to receive such service or, in the case of an issuer with a class of securities registered with the Commission, by sending the OIP via U.S. Postal Service certified, registered, or Express Mail and obtaining a confirmation of attempted delivery on the most recent address shown on the entity's most recent filing with the Commission.

Further, the OIP in this matter authorizes service of the OIP “by any means permitted by the Commission’s Rules of Practice.” Therefore, the Division asked the Commission’s Secretary to first attempt service on the Respondents via U.S. Priority Mail Express.

3. The Office of the Secretary provided me with the U.S. Priority Mail Express tracking numbers for the copies of the Order Instituting Proceedings (“OIP”)¹ that were mailed by the Secretary to the respondents in these proceedings. I input each of the tracking numbers into the U.S. Postal Service’s (“USPS’s”) package tracking system on its Internet website located at www.usps.com, and printed out the tracking confirmations in order to obtain confirmation of the delivery or attempted delivery of the OIP on each respondent. A true copy of the tracking confirmations for all of the respondents for whom express mail service was attempted is attached as Exhibit 1, hereto.

4. The Secretary mailed the OIP to respondent Gold Lakes Corp., CIK 1386936 (“GLLK”), via Priority Mail Express, Tracking No. EF 200199091 US, to the address shown on its most recent EDGAR filing at 3401 Enterprise Parkway, Suite 340, Beachwood, OH 44122. This address is taken from GLLK’s last filing with the Commission, which was a Form 8-K filed with the Commission on October 19, 2018. The USPS tracking system confirms that the package was delivered on July 25, 2019. See Exhibit 1 at p. 1.

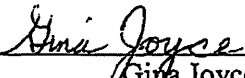
5. The Secretary mailed the OIP to respondent Novagen Ingenium Inc., CIK 1425173 (“NOVZ”), via Priority Mail Express, Tracking No. EF 200199105 US, to the address shown on its most recent EDGAR filing at 3773 Howard Hughes Parkway, Suite 500S, Las Vegas, NV 89169-6014. This address is taken from NOVZ’s last filing with

¹Each service package included the OIP, a letter from the Commission’s Secretary, and a letter from the Division offering discovery pursuant to Rule of Practice 230.

the Commission, which was a Form 8-K filed with the Commission on August 20, 2018. The USPS tracking system confirms that delivery was attempted on July 25, 2019. The addressee was unknown. The package was returned to the SEC. *See* Exhibit 1 at p. 4.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 22, 2019.



Gina Joyce

Track Another Package +

Tracking Number: EF200199091US

Remove X

Your item was delivered at 11:28 am on July 25, 2019 in BEACHWOOD, OH 44122 to SEC 20549 R26. The item was signed for by A PARNTHERS.

 **Delivered**

July 25, 2019 at 11:28 am
Delivered
BEACHWOOD, OH 44122

Get Updates 

Feedback

Text & Email Updates



Proof of Delivery



Tracking History



July 25, 2019, 11:28 am

Delivered

BEACHWOOD, OH 44122

Your item was delivered at 11:28 am on July 25, 2019 in BEACHWOOD, OH 44122 to SEC 20549 R26. The item was signed for by A PARNTHERS.

July 25, 2019, 7:54 am
Arrived at USPS Regional Facility
CLEVELAND OH DISTRIBUTION CENTER

July 25, 2019, 5:19 am
Departed USPS Regional Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

July 24, 2019, 7:23 pm
Arrived at USPS Regional Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

Product Information



See Less ^

Feedback

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Track Another Package +

Tracking Number: EF200199105US

Remove X

Your item was delivered at 10:52 am on August 8, 2019 in WASHINGTON, DC 20549 to SEC 20549 R26. The item was signed for by C HARRIS.

 **Delivered**


August 8, 2019 at 10:52 am
Delivered
WASHINGTON, DC 20549

Get Updates 

Feedback

Text & Email Updates 

Proof of Delivery 

Tracking History 

August 8, 2019, 10:52 am
Delivered
WASHINGTON, DC 20549

Your item was delivered at 10:52 am on August 8, 2019 in WASHINGTON, DC 20549 to SEC 20549 R26. The item was signed for by C HARRIS.

August 8, 2019, 10:39 am
Out for Delivery
WASHINGTON, DC 20018

August 8, 2019, 10:21 am
Arrived at Post Office
WASHINGTON, DC 20018

August 8, 2019, 7:52 am
Arrived at USPS Regional Facility
WASHINGTON DC V STREET DISTRIBUTION CENTER

August 7, 2019, 3:35 pm
Departed USPS Regional Facility
LAS VEGAS NV DISTRIBUTION CENTER

August 7, 2019, 10:21 am
Unclaimed/Being Returned to Sender
LAS VEGAS, NV 89119

July 25, 2019, 1:54 pm
Addressee Unknown
LAS VEGAS, NV 89169

July 25, 2019, 8:38 am
Arrived at Post Office
LAS VEGAS, NV 89119

July 25, 2019, 7:19 am
Arrived at USPS Regional Facility
LAS VEGAS NV DISTRIBUTION CENTER

July 25, 2019, 5:19 am
Departed USPS Regional Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

Feedback

July 24, 2019, 7:49 pm
Arrived at USPS Regional Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

Product Information



See Less ^

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Feedback

The easiest tracking number is the one you don't have to know.

With Informed Delivery®, you never have to type in another tracking number. Sign up to:

Exhibit 1, p. 5

Exh. A, p. 8

CERTIFICATE OF SERVICE

I hereby certify that true copies of the Division of Enforcement's Motion for Default and Brief in Support were served on the following on this 5 day of November, 2019, in the manner indicated below:

By Hand:

Office of the Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-2557

By Certified Mail:

Gold Lakes Corp.
3401 Enterprise Parkway, Suite 340
Beachwood, OH 44122

By Certified Mail:

Novagen Ingenium Inc.
3773 Howard Hughes Parkway, Suite 500S
Las Vegas, NV 89169-6014


James Carlson