UNITED STATES OF AMERICA
BEFORE THE
SECURITIES AND EXCHANGE COMMISSION
ADMINISTRATIVE PROCEEDING
File No. 3-19745

In the Matter of

NO BORDERS, INC.

Joseph Snyder

Petitioners.

PETITIONER'S REPLY BRIEF IN FURTHER SUPPORT OF PETITION TO TERMINATE TRADING SUSPENSION

Dated: August 10, 2020

San Diego, California

LAW OFFICE OF ANDREW COLDICUTT

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Cases

Petitioners, No Borders, Inc. and Joseph Snyder, in his capacity as CEO and Director of the company (the "Company" or "NBDR"), respectfully submits this Reply Brief in Further Support of Petition to Terminate Trading Suspension in response to the Answering Brief filed by the Los Angeles Division of Enforcement ("LADE") and suspension that was imposed as of April 3, 2020 by Order of the United States Securities and Exchange Commission ("the SEC").

INTRODUCTION

The Answering Brief by the LADE emphatically disappoints as it appears that they did not read the Company's previous submissions and instead mostly just repeats arguments which the Company previously and reasonably explained. The LADE attempts to mislead the trier of fact, and ultimately the public, just as they did in their Information before the Commission, by bringing up red herrings, and feigning to not understand the rational and logical explanations that have been consistently provided. The Company will once again explain that the LADE's assertions are incorrect. The business plans were accurate and not misleading; they did not specifically mention COVID-19 because the virus was still new, immaterially effected the business and the forthcoming impact was unknown. The Company found itself in a unique situation to help during this pandemic and rebranded certain of its medical products and added two new products. NBDR did not mislead the public, the SEC, or anyone else with statements regarding operation centers, agreements to purchase and ship products, Emergency Use Authorization ("EUA") approvals, or share issuances. The Order to suspend was unnecessary to protect the public, and as such, NBDR respectfully requests that the Petition to Terminate Trading Suspension be granted by the Commission and the Order suspending trading be terminated and/or vacated.

ARGUMENT

I. LADE's Eyes Wide Shut to NBDR's Public Statements, Including the Business Plan, Being Accurate and Truthful

Even after many reasonable explanations and responses, the LADE is still bewailing the business plan in the annual report; but the business operations directed towards COVID-19 were either pre-existing or minimal and as such the business plan was not contradictory. The LADE fails to acknowledge several key points. First, COVID-19 had only been recognized just over a couple months at that point, and its extreme future impact on American society was unknown. Second, the Company was already selling the type of equipment that was needed to protect against COVID-19, of which Dental Consumables are a part, and as such the Company was merely rebranding current products. Third, the Company only added two products to its already existing product line, one that has over 4,000 products. As such, the reports were accurate at the time of publishing. Through this lens it is clear that the information about the Company was accurate.

A. COVID-19 was Newly Discovered with Unknown Consequences When Annual Report Filed

The World Health Organization's ("WHO") more notable announcements that detail the timeline of the pandemic are as follows: on January 10, 2020 issued its first guidance on the novel coronavirus. (Exhibit 1) Then on February 11, 2020, the novel coronavirus was actually named

COVID-19. (Exhibit 2) On March 3, 2020, the WHO announced that there was a shortage of personal protective equipment ("PPE") endangering health workers worldwide. (Exhibit 3) On March 11, 2020, CNN stated, there were 1,267 cases in the entire United States of America at that time. (Exhibit 4) Only on March 11, 2020, did the WHO actually characterize COVID-19 as a global pandemic for the first time. (Exhibit 5) Considering the unknown future impact, of COVID-19, there was no need to change the business plan in the Annual Report.

B. NBDR Used Its Fortunate Position in the Medical Field to Rebrand and Help the Public During a Pandemic

With the pandemic expanding, the Company quickly saw that it could assist with providing COVID-19 protection by rebranding its personal protective equipment ("PPE") and adding new products. One of the additional products was FDA registered sample collection kits; NBDR announced it planned on bringing in these collection kits on March 12, 2020, finalized the purchase of the sample collection kits (swab / oral and nasal passage tests) on March 18, 2020, and sold a portion of the tests to a medical center on March 20, 2020 (Exhibit 6). The Company was hoping for the sample collection kits to be a big success, but with less than two weeks from locating the product to purchasing and attempting to sell that product, very little was known about that product's potential success or failure. On March 23, 2020, the Company announced that it was adding another product and executed an agreement to purchase thousands (2,000 individual tests or 100 boxes) of 15-Minute Serological COVID-19 tests (Exhibit 7). There was no need for the Company to change its business plan for two additional products to a lineup of

over 4,000 available products that were just purchased and had an unknown bearing on the Company's business.

C. The Company was Actively Engaged with Politicians to Rapidly Deploy Tests

The Company's statements about working with and being supported by politicians in order to assist with the distribution of COVID-19 products were and are true. The Company announced that it was going to use its resources to actively engage with politicians to rapidly deploy test kits for COVID-19. In that same series of tweets, the Company further clarified that "the tests were currently being built & should be available for personal/gov purchase/deployment ASAP" (Exhibit 8). To "actively engage" is simply to be in a state of action with a person or persons. The Company did this by reaching out to the Congressmen and discussing the Company's plans to supply collection kits for COVID-19 (Exhibits 6, 9). The Company did not state that tests were available, or even on the way, but only that the Company was working on building them to deploy them as soon as possible. The Company had purchased those sample collection kits (Exhibit 6) and was working "rapidly" to deploy them. As Congressman Gosar's positive tweet in favor of the Company confirms, the Company was actively engaged with politicians to immediately bring, and to rapidly deploy collection kits.

D. Public Information Was Current, Plentiful, and Easily Accessible

In addition to the business description within the Annual Report, there was plenty of easily accessible and accurate information available about NBDR and its products. The Regulation A

Offering that was posted on the SEC's website included further details of NBDR's businesses. The Company did not specifically discuss masks, gloves, gauzes and gowns in its business plan, as these are only a small part of the product line (over 4,000 products); also, they are not big ticket items and the profit on them is much smaller as compared to other items offered, such as x-ray machines and operating packages. In addition to the Company filings, Twitter and press releases, the Company websites where products could be actively purchased had all the updated products and information about those products disclosed as well. The Company information available to the public was accurate and plentiful at all times and there were no contradictions. There were no inaccuracies and there was no need to update and insert COVID-19 throughout.

II. NBDR's Statements Substantiated by Facts

NBDR went to great lengths to only make reliable and factual statements, both to the public and privately to the LADE, regarding purchase orders, shipping, the status of contracts to ship, and EUA approval. NBDR, through its subsidiary MediDent, had begun expedited Air Freight shipments of medical equipment and supplies just as it had announced (Exhibit 6, 7). The Company was straightforward in stating that it had entered into some agreements, was working on others and had in fact already received small amounts of product but had yet to finalize a large bulk order. NBDR was truthful when it told the LADE during the interview that it had purchased FDA registered and EUA products, (Exhibits 6, 13) and that Liming Bio was listed on the FDA website as having an EUA. Moreover, as explained in great detail in the Opening Brief, the Company kept up with rapidly evolving regulations.

A. NBDR was Candid About Purchase Orders and Purchase Agreements

As previously asserted, and contrary to the LADE's account, Mr. Snyder did not admit to the LADE that there were no purchase orders or purchase agreements. What Mr. Snyder said was that he was purchasing products based on price and availability and that he was working on a large bulk order agreement which he had not yet finalized. The LADE then muddles two different topics to further confuse the trier of fact when it states that the Company would be awaiting customer sales orders before any deals would be final, as it did not have the funds to purchase the products (Answering Brief pg. 24). The Company had in fact already purchased and received orders for the smaller amounts of products which were shipped to the operations center (Exhibits 6, 7, 10, 11, 12). Had the LADE given the Company more time and guidance, the Company could have produced more documentation. Instead, the LADE ambushed the Company giving it negligible time to prepare for the interview, even less time to send documents, and then without requesting any further documentation or clarification, the Company was suspended.

The LADE also contends that whether the Company has continued to conduct its business activities post-petition has no bearing on the termination of suspension (Answering Brief, page 23); the Company disagrees, as the statements that gave rise for concern to the LADE that the Company made about its business have been proven to be true.

B. PPE was Being Air Freighted to NBDR's Operations Center

"Air Freight" is defined by the Merriam-Websters Dictionary as "freight transport by air in volume." How many items does one receive Air Freighted by Amazon; does the LADE expect shipped items to be on a ship? The Company's purchases were being brought to the operations center via airplanes from Asia, hence Air Freighted. The Company did not state in the March 20, 2020 press release that the current shipment contained ventilators; it stated that it had begun shipments of medical equipment and supplies into its operations center. NBDR did in fact Air Freight surgical masks and isolation gowns (Exhibits 10, 11, 12), as stated in that press release. Lastly, the Company's facilities disclosure in its filings are and were accurate; there were no conditions to corporate ownership as the space was provided free by the CFO without any agreements. The Company has been nothing but forthright in all of these statements.

C. Liming Bio had an EUA

It is both unfortunate and strange that the LADE could not verify the information provided to them about the Liming Bio Strong Step test on the Food and Drug Administration's ("FDA") Website. Liming Bio, the company that made the 15-minute serological tests that the Company purchased, as of the time of the interview and currently, is listed on the FDA website as having an EUA (Exhibit 13) and documents on the Liming Bio website show that they had an FDA EUA as of March 25, 2020 (Exhibit 14). The Company stated as such and provided the LADE the name and website as well as photos of the products at the Companies operations center (Exhibits 13, 15). The LADE attached a search of the FDA website on March 25, 2020 that was updated as of March 23, 2020, (over a week before the interview on April 1, 2020) to attempt to show that Liming Bio was not listed (Answering Brief Exhibit 2). As previously explained, a

company applies for the EUA and has 15 days to sell and distribute the products before an EUA may be granted. This means that while a company may not appear on the FDA website, that does not mean it does not have the ability to sell its products or that it did not in fact have an EUA. Furthermore, Liming Bio appeared on the FDA website as of the date of the interview on April 1, 2020 and would have been discoverable at that point had the LADE cared to redo their search. NBDR never misled the SEC with regards to the FDA and/or an EUA.

III. Even with Minimal Staff, NBDR Complied as Best it Could to the LADE's Requests in the Inadequate Amount of Time Given

The Company responded to the LADE quickly and vigorously, but due to the incredibly short time frame given and the minimal staff of the Company, it was only able to provide partial documentation. The LADE cites a case against Helpeo, Inc., as an attempt to state that a lack of resources does not relieve an issuer from its disclosure obligations. Helpeo, rel. No. 34-82551, 2018 WL 478320. Helpeo is a case about a company that hadn't filed any SEC or other filings in several years and claimed to not have received the suspension notice within the 10 day time frame to file the termination request due to a lack of resources and as such the request was denied. In contrast, NBDR was reached within 4-5 days, was able to produce some documentation and perform a voluntary interview. The Company answered the LADE's second call the very next day and obliged the LADE's onerous requests for the immediate production of documents and to be subjected to an interview on impossibly short notice. In this situation the Company was given only several hours to prepare all the documentation that the LADE had demanded, prepare for an interview, all while operating a business during a pandemic. The

LADE never followed up, provided any guidance, or requested anything further. The Company was working with the LADE as best it could but could only do so much in the impossible time frame that was given. Had the LADE given the Company more time to respond and further guidance the Company would have been able to be better prepared and produce more documentation.

IV. Increase in Trading Volume Does not Suggest Impropriety

The Company unreservedly disagrees that the increase trading volume and share price suggested investors may have been misled. There were no unusual stock deposits or sales, the stock deposits were of typical size, the Company was apparently mentioned on one dreadful website, and the stock price was within historical norms, having had a price of $.11 in March 2018.

A. No Unusual Stock Deposits or Sales

The Company has publicly and directly explained where those additional share deposits were coming from as it disclosed the Regulation A Offering and the share issuances in its OTC Markets filings (Exhibit 16u). The Company was selling Qualified Regulation A shares to investors who were permitted to purchase those shares and permitted to sell those shares. The Company had publicly announced the Regulation A, updated the public as to its status, and included the disclosure of the share issuances in its OTC Markets Filings. Those stock deposits and sales were made through FINRA registered firms, were disclosed and not unusual.

B. Stock Deposits Were of a Regular Size

The stock deposits were of a typical size considering the price of the shares, the size of the offering and the number of shares outstanding. The Company was selling shares at $0.01 per share (to begin with), which equates to 1,000,000 shares for every $10,000. The Company's Regulation A Offering was for the amount of 300,000,000 common shares. The Company was attempting to raise $3,000,000 and the Company had approximately 320,000,000 common shares outstanding at the beginning of March 2020; in that context the share deposits were actually quite small, as per the method used by the LADE Answering Brief, sixteen million shares would equate to just 5% of the Company's issued common shares. When viewed in that light and adding the facts that the Company disclosed the share sales in its OTC Markets Reports and the Transfer Agent consistently updated the outstanding share amounts on the OTC Markets website, these share deposits were neither suspicious, unusual, or out of the ordinary.

C. Company Being Mentioned on One Website Hardly Actively Promoted

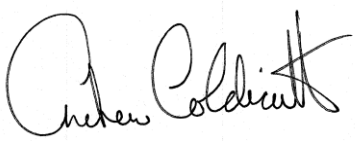
As to being actively promoted, the LADE points out a single website that the Company certainly has never heard of, and by the looks of the website, likely, no one else besides the LADE has either. That website, which features hundreds of stocks, only mentioned the Company three times total – once as just a symbol with 7 other symbols, once in a heading and a paragraph about trading volume and once in a paragraph again about trading volume. This type of minimal inclusion on a website certainly does not rise to the level of being "actively promoted".

CONCLUSION

If the Company had been given a better opportunity and had the LADE worked with the Company instead of assuming the worst, especially during an unprecedented crisis, the LADE would have been able to make an informed decision instead of sprinting to its pre-determined conclusion. In the instant matter, that sprinting led the LADE to err as to the Company selling 15-Minute Serological Tests that have an EUA (Exhibit 13, 14). The LADE erred as to the Company selling PPE and other medical equipment (Exhibits 6, 7, 10, 11, 12, 13). The LADE erred as to the business plan. The LADE erred when it came to the amount of public information available. The LADE erred when it came to the irregularity of the deposit of shares in brokerage accounts. The LADE erred that there was a potential harm to the public. The LADE erred on essentially every portion of what it claimed were the facts before the Commission causing it to institute this suspension. The Company understands that the LADE and other divisions are under a lot of pressure to act; however, acting prematurely and without sufficient evidence hurts the market and hurts the public's trust with the SEC. The SEC should terminate this suspension in order to show the public that the SEC can admit when it has made a mistake.

Dated August 10, 2020

San Diego, California



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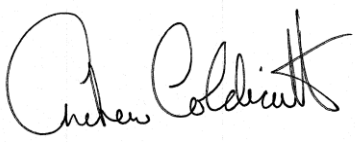
Statement of Filing by E-Mail

I hereby certify that on August 10, 2020, I caused a true and correct copy of the foregoing this Reply Brief in Further Support of Petition To Terminate Trading Suspension to be filed via e-mail, in Administrative Proceeding File No. 3-19745, *In the Matter of No Borders, Inc.*, with the Office of the Secretary of the United States Securities and Exchange Commission. This e-mail filing is pursuant to the SEC's Order of March 8, 2020, *In re Pending Administrative Proceedings.* I sent this filing to the e-mail address APFilings@sec.gov.

Dated: August 10, 2020

San Diego, California



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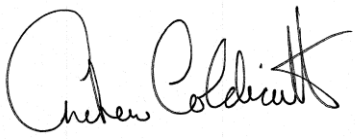
Certificate of Document Length

I hereby certify that on August 10, 2020, I used the "Word Count" function in Microsoft Word to determine the word count in this Reply Brief in Further Support of Petition To Terminate Trading Suspension to confirm compliance with the 3,000 word limitation set forth in the Order Requesting Additional Submissions. Excluding any declarations, affidavits, attachments, exhibits, cover page, Table of Contents, Table of Authorities, Statement of Filing by E-mail, this Certificate of Document Length, the Certificate of Service, and counsel's signature block, the word count is 2,999 words.

Dated: August 10, 2020

San Diego, California



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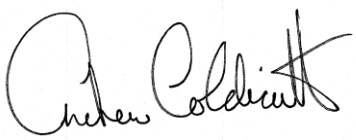
Certificate of Service

On August 10, 2020, I caused a true and correct copy of this foregoing Rely Brief in Further Support of Petition To Terminate Trading Suspension to be delivered to the following parties and other persons entitled to notice in the manner set forth to the right of each served party:

Division of Enforcement (via e-mail)
Los Angeles Regional Office
Securities and Exchange Commission
Attn: Marc Blau, Esq., Assistant Regional Director (to blaum@sec.gov)
Attn: Robert Tercero, Esq. (to terceror@sec.gov)
Attn: Amy Longo, Esq. (to longoa@sec.gov)
Attn: (to ApFilings@sec.gov)

Dated: August 10, 2020,

San Diego, California



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Counsel to No Borders, Inc.

PETITIONER JOSEPH SNYDER'S SWORN STATEMENT

I, Joseph Snyder, individually, and as President and Chief Executive Officer of No Borders, Inc., being duly sworn, state that I have read the foregoing Petitioner's Reply Brief in Further Support of Petition to Terminate Trading Suspension and the previous Petitioner's Opening Brief in Support of Petition to Terminate Trading Suspension in the Securities of No Borders, Inc, filed on July 13, 2020, and have personal knowledge of the facts contained therein and that such facts are true and correct.

Date: August 10, 2020

Joseph Snyder
Individually, and as President
and Chief Executive Officer
No Borders, Inc.

STATE OF California)
) ss.
COUNTY OF Kern)

I HEREBY CERTIFY, that on this day, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Joseph Snyder, to me known to be the person described in and who executed this Sworn Statement, and he acknowledged to and before me that he executed the same. He is personally known to me or has produced a CA DL as identification and did take an oath.

SWORN TO AND SUBSCRIBED before me this 10th day of August 2020

M. Attached

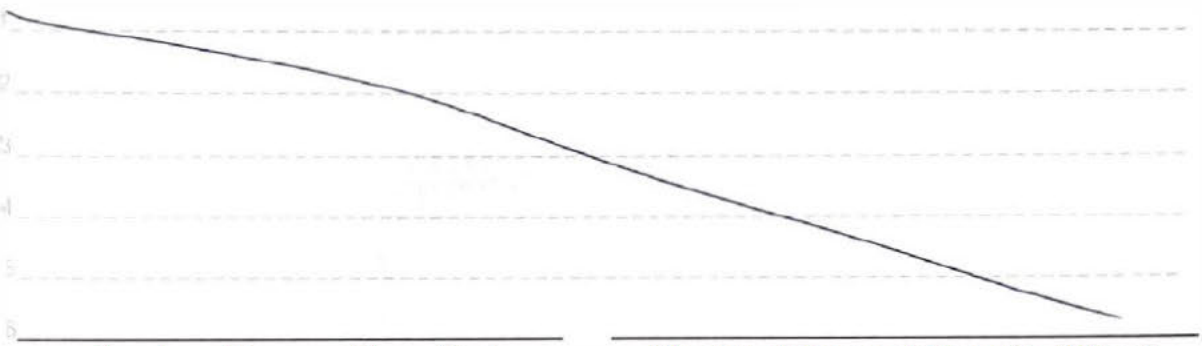
Notary Public

My Commission Expires: 2-15-2021

(Seal)

CALIFORNIA JURAT WITH AFFIANT STATEMENT **GOVERNMENT CODE § 8202**

☒ See Attached Document (Notary to cross out lines 1–6 below)
☐ See Statement Below (Lines 1–6 to be completed only by document signer[s], *not* Notary)



Signature of Document Signer No. 1 *Signature of Document Signer No. 2 (if any)*

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of Kern

Subscribed and sworn to (or affirmed) before me on this 10th day of August, 2020
Date *Month* *Year*
by (1) Joseph Snyder
(and (2) _____),
Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

LAURA COALY
Notary Public – California
Kern County
Commission # 2180209
My Comm. Expires Feb 15, 2021

Signature Laura Coaly
Signature of Notary Public

Seal
Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

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Title or Type of Document: Sworn Statement Document Date: 8-10-2020
Number of Pages: 1 Signer(s) Other Than Named Above: _____

EXHIBIT 1

China makes genome sequencing of novel coronavirus publicly available

11 - 12 January 2020

China shares the genetic sequence of the novel coronavirus, which will be very important for other countries as they develop specific diagnostic kits.

Key materials:

Disease outbreak news item

WHO issues its first guidance on the novel coronavirus

10 January 2020

Developed with reference to other coronaviruses, such as SARS and MERS, WHO issued a tool for countries to check their ability to detect and respond to a novel coronavirus.

This information is to help with identifying main gaps, assessing risks and planning for additional investigations, response and control actions.

Key materials:

National capacities review tool

WHO reports on pneumonia of unknown cause in China

5 January 2020

WHO published its risk assessment and advice and reported on the status of patients and the public health response by national authorities to the cluster of pneumonia cases in Wuhan.

Key materials:

Disease outbreak news item

WHO responding to a cluster of pneumonia cases in Wuhan

4 January 2020

WHO announced it would work across its 3 levels – country office, regional office and HQ – to track the situation and share details as they emerged.

EXHIBIT 2

The Crisis Management Team (CMT) mechanism brings together WHO, OCHA, IMO, UNICEF, ICAO, WFP, FAO, the World Bank and several UN Secretariat departments.

The CMT will be managed by the Executive Director of WHO Health Emergencies Programme, Dr Mike Ryan. It will help WHO focus on the health response while the other agencies will bring their expertise to bear on the wider social, economic and developmental implications of the outbreak.

Key materials:

Situation report - 23

Research and innovation forum sets priorities for COVID-19 research

12 February 2020

More than 400 experts and funders met at WHO's Geneva HQ to accelerate research to stop the COVID-19 outbreak. Featuring updates from the frontlines of the response in China, the meeting addressed issues such as: developing easy-to-apply diagnostics, accelerating existing vaccine candidates and preventing infection.

Key materials:

- WHO news release
- R&D Blueprint webpage

Novel coronavirus disease named COVID-19

11 February 2020

Guidelines mandated that the name of the disease could not refer to a geographical location, an animal, an individual or group of people. It also needed to relate to the disease and be pronounceable. This choice will help guard against the use of other names that might be inaccurate or stigmatizing.

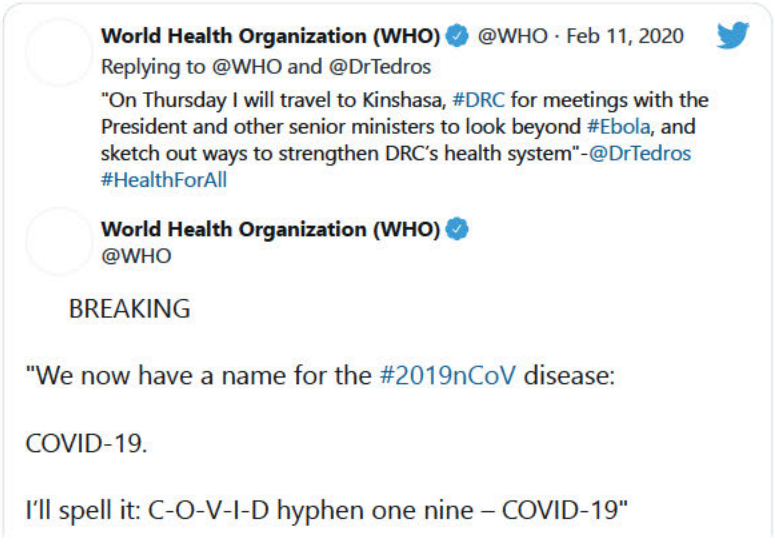


EXHIBIT 3

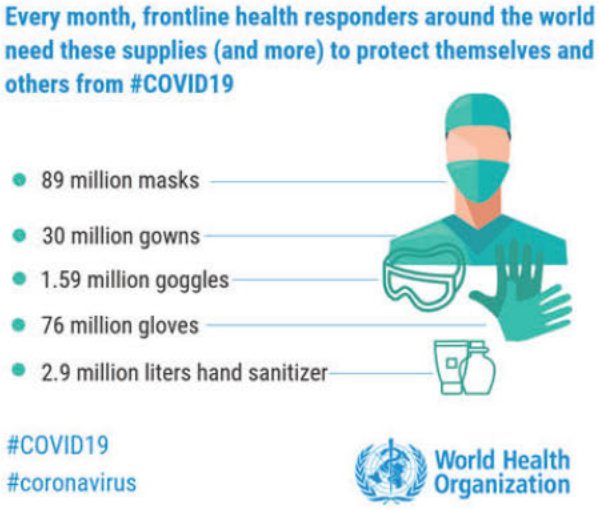
Shortage of personal protective equipment endangering health workers worldwide

3 Mar 2020

WHO has shipped nearly half a million sets of personal protective equipment to 47 countries, but the global supply is rapidly depleting.

Shortages are leaving doctors, nurses and other frontline workers dangerously ill-equipped to care for COVID-19 patients, due to limited access to supplies such as gloves, medical masks, respirators, goggles, face shields, gowns, and aprons.

To meet rising global demand, WHO estimates that industry must increase manufacturing by 40 per cent



Key materials:

- News release
- Interim WHO guidance: Rational use of personal protective equipment for COVID-19
- WHO Director-General's opening remarks at the media briefing on COVID-19 – 3 March 2020
- Periscope recording of the press conference
- Video clips for the broadcasters
- Daily COVID-19 situation report

"There's no choice but to act now"

2 March 2020

Speaking at the COVID-19 media briefing, the Director-General emphasized that the virus is capable of community transmission but can be contained with the right measures.

Tedros Adhanom Ghebreyesus @DrTedros · Mar 2, 2020
Replying to @DrTedros
Containment of #COVID19 is feasible and must remain the top priority for all countries. There is no one-size fits all approach. @WHO is advising countries on actions they can take for each of the scenarios – first case, first cluster, first evidence of community transmission.

EXHIBIT 4

11 55 p.m. ET, March 11, 2020

The US now has 1,267 cases of the coronavirus

There are at least 1,267 cases of the coronavirus in the United States, according to state and local health agencies and the US Centers for Disease Control and Prevention.

70 cases are repatriated from overseas, l ke citizens evacuated from China or the Diamond Princess cruise ship in Japan.

1,197 cases were detected and confirmed on US soil, spread out across 43 states and Washington, DC.

These figures include presumptive positive cases -- meaning the patient tested positive in a public health lab and is pending confirmation from the CDC.

The US death toll is now at 38, after another patient died in Washington state.

EXHIBIT 5

The Government of Azerbaijan is contributing to global efforts to address COVID-19, coordinating with neighbouring countries, and has pledged US$ 5 million to WHO's strategic preparedness and response plan.

Key materials:

News release

WHO characterizes COVID-19 as a pandemic

11 March 2020

Speaking at the COVID-19 media briefing, the WHO Director-General said:

"WHO has been assessing this outbreak around the clock and we are deeply concerned both by the alarming levels of spread and severity, and by the alarming levels of inaction.

We have therefore made the assessment that COVID-19 can be characterized as a pandemic.

Pandemic is not a word to use lightly or carelessly. It is a word that, if misused, can cause unreasonable fear, or unjustified acceptance that the fight is over, leading to unnecessary suffering and death.

Describing the situation as a pandemic does not change WHO's assessment of the threat posed by this virus. It doesn't change what WHO is doing, and it doesn't change what countries should do.

We have never before seen a pandemic sparked by a coronavirus. This is the first pandemic caused by a coronavirus.

And we have never before seen a pandemic that can be controlled, at the same time "

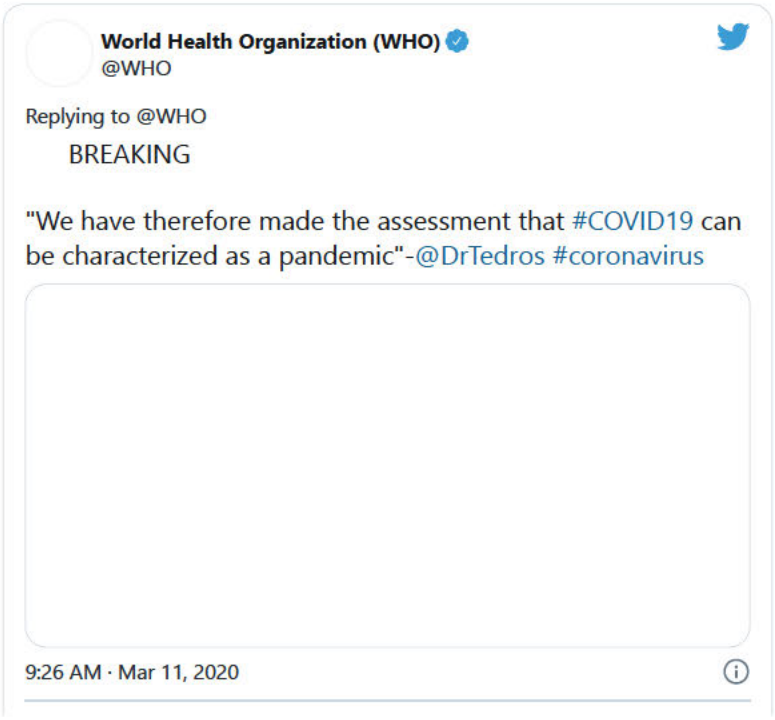


EXHIBIT 6

NB Inc Wire 3-18-2020

ISSUER: **MIRACLEAN TECHNOLOGY CO., LTD.** **FLOOR 3, NO. 18, RONGSHUXIA INDUSTRIAL ZONE, TONGLE COMMUNITY, LONGGANG DISTRICT, SHENZHEN, CHINA, 518116** TEL: +86 755-89616773 FAX: +86-755 89616775	**MIRACLEAN TECHNOLOGY CO., LTD.** ***PROFORMA INVOICE***
ISSUE TO: **Company:No Borders Dental Resources IncSupplies** **Name:Cynthia Tanabe** **Add:18716 E Old Beau Trl., Queen Creek AZ 85142** **Phone:1-602-717-5863**	**INVOICE NO.: MRC-P20200318** **DATE: Mar.18, 2020**
DELIVERY TERMS: **DELIVERY WAY, SHIPMENT VIA COURIER** **DELIVERY TIME, THE SHIPMENT WILL BE BE SENT 5-7 WORKING DAYS. AFTER RECEIVING THE DOWN PAYMENT.**	**PAYMENT TERMS:** **T/T, PAY 100% AS THE DOWN PAYMENT WITHIN 1 WORKING DAYS.**

ITEM	DESCRIPTION	EXW PRICE	QUANTITY	AMOUNT
MBT-010	Virus sampling kits	$1.60	5,000	$8,000.00
Shipping cost	SZ-USA by DHL 4-5 Days	$163.00	1	$163.00

TOTAL AMOUNT IN USD **USD :8163.00**

USD EIGHT THOUSAND ONE HUNDRED AND SIXTY THREE ONLY

NOTE:Client need to be responsible for the customs clearance of the goods and port of destination all charges.

BENEFICIARY COMPANY NAME: MIRACLEAN TECHNOLOGY CO., LTD.
BENEFICIARY COMPANY ADDRESS: FLOOR 3, NO. 18, RONGSHUXIA INDUSTRIAL ZONE, TONGLE COMMUNITY, LONGGANG DISTRICT, SHENZHEN, CHINA, 518116

BENEFICIARY BANK NAME: AGRICULTURAL BANK OF CHINA, SHENZHEN BRANCH, LONGGANG SUB-BRANCH
BENEFICIARY ACCOUNT NO.: 41022 90004 0032869
BENEFICIARY BANK ADDRESS: LONGGANG ABC BLDG, SHENHUI RD., LONGGANG AREA, SHENZHEN, CHINA
SWIFT CODE: ABOCCNBJ410

NB Inc Wire 3-19-2020

ISSUER:
MIRACLEAN TECHNOLOGY CO., LTD.
FLOOR 3, NO. 18, RONGSHUXIA INDUSTRIAL ZONE, TONGLE COMMUNITY, LONGGANG DISTRICT, SHENZHEN, CHINA, 518116
TEL: +86-755-89616773 FAX: +86-755-89616775

ISSUE TO:
Company:No Borders Dental Resources IncSupplies
Name:Cynthia Tanabe
Add:18716 E Old Beau Trl., Queen Creek AZ 85142
Phone:1-602-717-5863

MIRACLEAN TECHNOLOGY CO., LTD.

PROFORMA INVOICE

INVOICE NO.:	MRC-P20200318	DATE:	Mar.18, 2020

DELIVERY TERMS:
DELIVERY WAY, SHIPMENT VIA COURIER DELIVERY TIME, THE SHIPMENT WILL BE BE SENT 5-7 WORKING DAYS. AFTER RECEIVING THE DOWN PAYMENT.

PAYMENT TERMS:
T/T, PAY 100% AS THE DOWN PAYMENT WITHIN 1 WORKING DAYS.

ITEM	DESCRIPTION	EXW PRICE	QUANTITY	AMOUNT
Shipping cost	SZ-USA by DHL 4-5 Days	$1,004.00	1	$1,004.00

TOTAL AMOUNT IN USD **USD :1004.00**

USD ONE THOUSAND AND FOUR ONLY

NOTE:Client need to be responsible for the customs clearance of the goods and port of destination all charges.

BENEFICIARY COMPANY NAME: MIRACLEAN TECHNOLOGY CO., LTD.
BENEFICIARY COMPANY ADDRESS: FLOOR 3, NO. 18, RONGSHUXIA INDUSTRIAL ZONE, TONGLE COMMUNITY, LONGGANG DISTRICT, SHENZHEN, CHINA, 518116

BENEFICIARY BANK NAME: AGRICULTURAL BANK OF CHINA, SHENZHEN BRANCH, LONGGANG SUB-BRANCH
BENEFICIARY ACCOUNT NO.: 41022 90004 0032869
BENEFICIARY BANK ADDRESS: LONGGANG ABC BLDG, SHENHUI RD., LONGGANG AREA, SHENZHEN, CHINA
SWIFT CODE: ABOCCNBJ410

MSC-96000

Product Description

MSC-96000 is a Flocked Sampling Swab used for cell & virus specimen collection, and it has been designed for Nasopharyngeal clinical diagnostics. It utilizes state of the art “spray on technology” that the flocking process by means of an electro-static charge perpendicularly attaches millions of nylon microfibers on the medical grade handle tip. The flocked swab is ideal for collecting large amount of cells and rapid elution of the specimens that instantly releases the cells into the transport medium. It has been well recognized and adopted by the diagnostic test kit manufacturers who produce reagents in molecular genetics, forensics and clinical laboratories sectors. The perpendicular nylon fibers act like a soft brush, allowing the improved collection and release of both cellular and liquid samples.

Product Features

■ **Ergonomic and anatomic design,** perpendicular nylon fiber acts like a soft brush thus improves patient comfort and efficiency in cell specimen collection.

■ **Improved sample collection,** sprayed-on fibers statically charged and attached to the applicator tip in a uniform perpendicular manner and by means of strong capillary action cell specimens are rapidly absorbed.

■ **Superior sample elution,** with an open fiber structure it instantly dislodges the specimen cells into the liquid medium, unlike traditional wound swabs when the specimen is entrapped in the mattress core.

■ **Increased assay sensitivity,** flocked swabs are proven to elute >95% of the original sample rapidly thus easily resulting in improved assay sensitivity.

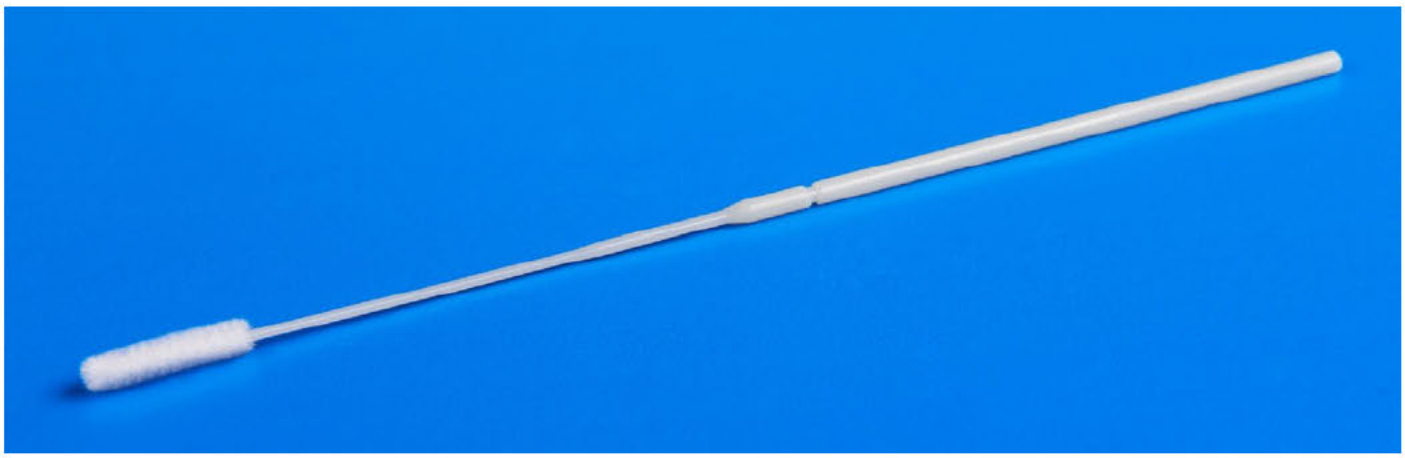
■ **Quantitative volume transfer,** measurable and consistent uptake and transfer from patient to the test tube has no internal mattress core to disperse and entrap the precious sample like traditional fiber wound swabs.

■ **Certified free of inhibitors and interference,** collection swabs are certified DNASE, RNASE-free and human DNA-free. They are also free of any PCR inhibitors, certificate of analysis available for each lot of manufacture.

Product Specifications

Item No.	Dimension of flocked tip			Dimension of Nylon handle			
	Width	Thickness	Length	Diameter 1	Diameter 2	Breakpoint	Total length
MSC-96000	3 mm	3 mm	16 mm	2.5 mm	Taper to 1.1	82 mm	150 mm

Product Pictures



Sterilization Process

We take ETO sterilization for MSC-96000 and take Gama Ray sterilization for Transport Mediums.

FDA U.S. FOOD & DRUG ADMINISTRATION

Establishment Registration & Device Listing

New Search Back To Search Results

Proprietary Name:	Absorbent tipped applicator; Sampling Swab
Classification Name:	APPLICATOR, ABSORBENT TIPPED, STERILE
Product Code:	KXG[6]
Device Class:	1
Regulation Number:	880.6025[7]
Medical Specialty:	General Hospital
Registered Establishment Name:	MIRACLEAN TECHNOLOGY CO., LTD.[8]
Registered Establishment Number:	3008572203
Owner/Operator:	Miraclean Technology Co., Ltd.[9]
Owner/Operator Number:	10054151
Establishment Operations:	Foreign Exporter; Manufacturer

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8. /scripts/cdrh/cfdocs/cfRL/rl.cfm?rid=204929
9. /scripts/cdrh/cfdocs/cfRL/rl.cfm?start_search=1&OwnerOperatorNumber=10054151

Page Last Updated: 08/03/2020

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FDA

U.S. Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993
Ph. 1-888-INFO-FDA (1-888-463-6332)
Contact FDA

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8. /scripts/cdrh/cfdocs/cfRL/rl.cfm?rid=204929
9. /scripts/cdrh/cfdocs/cfRL/rl.cfm?start_search=1&OwnerOperatorNumber=10054151

Purchase Order

Kern Medical
1700 Mount Vernon Avenue
Bakersfield CA 93306
United States

Approved		**Dispatch Via Email**
Purchase Order 10000-10131788	**Date** 03-20-2020	**Revision** 1 -
Payment Terms NET 30	**Freight Terms** FOB:DESTINATION	**Ship Via** BEST WAY
Buyer Kathryn Eacmen	**Phone**	**Currency** USD

Supplier: 1000101503
MEDIDENT SUPPLIES
18716 E OLD BEAU TRL
QUEEN CREEK AZ 85142
United States

Ship To: 1700 Mount Vernon Avenue
Bakersf e d CA 93306
Un ted States

Attention: See Deta Be ow

Bill To: PO Box 3519
Bakersf e d CA 93385
Un ted States

Tax Exempt? N **Tax Exempt ID:** **Replenishment Option:** Standard

Line-Sch	Item/Description	Mfg ID	Quantity	UOM	PO Price	Extended Amt	Due Date
1 - 1	VSSK-O-01 Oropharyngeal Medident EzSwab Collection and Transport System - Sterile Flocked Swabs with Viral Transport Medium × 250		250.00	EA	7.99	1997.50	03/20/2020
					Attent on: Er c Santerre		
					Schedule Total	1997.50	
					Item Total	1997.50	
2 - 1	VSSK-N-01 Nasopharyngeal Medident EzSwab Collection and Transport System - Sterile Flocked Swabs with Viral Transport Medium × 250		250.00	EA	7.99	1997.50	03/20/2020
					Attent on: Er c Santerre		
					Schedule Total	1997.50	
					Item Total	1997.50	

Total PO Amount 3995.00

Unauthorized

EXHIBIT 7

Shenzhen Minxin Industrial Development Co., Ltd.
1199 Heping Road, Luohu District, Shenzhen 803
Phone 86+13422552700

Client ID USA 2115

Invoice Title

Cynthia Tanabe, COO
No Borders
18716 E. Old Beau Trl
Queen Creek, AZ 85142 USA
Phone – 602 717 5863

Invoice	# 2002-0306
Date	03/22/20
Due Date	Upon Receipt

Description	Amount
Covid-19 (SARS CoV2) Antibody Test Kit 100 Units @$260 CIF per unit	$26,000
Total Due	$26,000

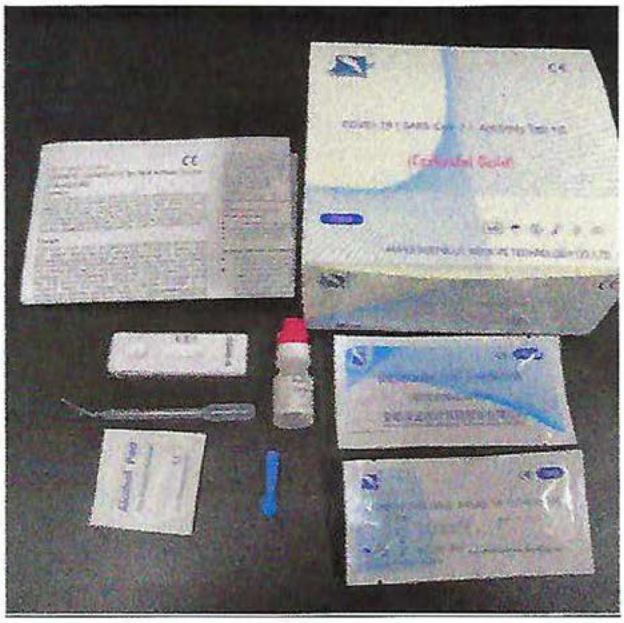

EXHIBIT 8

Thread

MediDent Supplies
@_Medident

Our executive team & operations teams are actively engaged with @GOPLeader @RepGosar @Jim_Jordan offices as well as @CDCgov to assist with deploying #COVID19 test kits. At this time we are working to offer in home test kits for rapid deployment in the US.- (continued)

10:19 PM Mar 11, 2020 Twitter for iPhone

18 Retweets and comments **16** Likes

MediDent Supplies @_Medident Mar 11
Replying to @_Medident
Many great orgs such as @gatesfoundation @amazon are making extraordinary moves to help people get access to testing supplies & our ability to deploy existing US based inventories of supplies nationwide allows us to work quickly to help keep people safe at home instead of(cont)
1 2 3

MediDent Supplies @_Medident Mar 11
Venturing out to a Dr. office while sick to take a test. Amazon is currently offering delivery logistics to test providers and patients, Gates Foundation & others have openly shared data & best practices while @US_FDA has done a stellar job of providing fasttrack approvals (cont)
1 2 1

MediDent Supplies @_Medident Mar 11
For testing kits & lab test centers such as @QuestDX @LABCORP which allows for companies like our to move quickly&safely to help our fellow Americans. MediDent Covid-19 Home Test Kits are currently being built & should be available for personal/gov purchase/deployment ASAP (cont)
1 2 2

MediDent Supplies @_Medident Mar 11
We will continue to keep our $NBDR shareholders & the public updated as this rapidly evolving situation unfolds. Please, wash your hands, stay away from groups & cover your cough. #beprepared #covidtestkits #COVID19US #hometestkits #letsworktogether
4 6

Show more replies

EXHIBIT 9

Gmail

Andrew Coldicutt <andrew@coldicuttlaw.com>

SEC- Congressman Paul Gosar and Supervisor Zack Scrivner

Joseph Snyder <jsnyder@nbdr.co> Wed, Apr 1, 2020 at 11:38 AM
To: Andrew Coldicutt <andrew@coldicuttlaw.com>

From: Zack Scrivner <zscrivner@libertystar.net>
Date: Monday, March 23, 2020 at 3:30 PM
To: "Van Flein, Tom" <Tom.VanFlein@mail.house.gov>
Cc: "Murphy, Braden" <Braden.Murphy@mail.house.gov>, Joseph Snyder <jsnyder@nbdr.co>, Jordan Dixon-Hamilton 'student' [redacted]
Subject: Re: MediDent Supplies COVID19 FDA Assistance

Thanks to all. Be safe and well!

Zack

On Mar 23, 2020, at 2:46 PM, Van Flein, Tom <Tom.VanFlein@mail.house.gov> wrote:

> Joe—sounds good. I am assigning our intern, and law student, Jordan Dixon-Hamilton (copied here) as our POC in pressing this with FDA. Jordan has the band width to make the follow up calls and emails that will be needed to prompt a response. If FDA inboxes are like ours right now, our volume is 5 times normal session week.
>
> Jordan, review Joe's email and ask in the last paragraph and let's set out a frame work to coordinate with Rep. McCarthy's office and FDA and HHS.
>
> Thank you.
>
> Thomas Van Flein, Esq.
> Chief of Staff
> Chief Legal Counsel
> Office of Congressman Paul Gosar (AZ-04)
> General Counsel—Western Caucus
> 2057 Rayburn HOB
> Washington, DC
> Tom.vanflein@mail.house.gov
> 202-595-4942

From: Murphy, Braden <Braden.Murphy@mail.house.gov>
Sent: Monday, March 23, 2020 5:40 PM
To: Joseph Snyder <jsnyder@nbdr.co>
Cc: zscrivner@libertystar.net; Van Flein, Tom <Tom.VanFlein@mail.house.gov>
Subject: RE: MediDent Supplies COVID19 FDA Assistance

Got it—thanks Joe. Will look into this and circle back.

Braden

Braden Murphy

Rep. Kevin McCarthy (CA-23)

(202) 236-3789 (cell)

From: Joseph Snyder <jsnyder@nbdr.co>
Sent: Monday, March 23, 2020 5:26 PM
To: Murphy, Braden <Braden.Murphy@mail.house.gov>
Cc: zscrivner@libertystar.net; Van Flein, Tom <Tom.VanFlein@mail.house.gov>
Subject: MediDent Supplies COVID19 FDA Assistance

To Braden with Congressman McCarthy and Tom with Congressman Gosar, (CC Supervisor Zack Scrivner, Kern County CA)

Thanks so much for your time on the phone/email. The points we discussed are outlined below.

I am the CEO of MediDent Supplies a Phoenix Arizona based medical equipment company. We have been working non-stop to provide testing equipment, PPE and other vital items to healthcare providers, municipalities and citizens around the country.

Last week we submitted our first EUA with the FDA, this EUA was for a 3 part Covid19 Specimen Collection Kit designed to be delivered to a patients home, to collect Nasal, Throat and Saliva samples then returned to a lab for PCR batch testing. We have received no communication back yet even though Tom from Congressman Gosar's office reached out and introduced us to Brandi Thompson at FEMA. (Thank you Tom again for your work so far and please thank the Congressman for his tweet about our work today)

Brandi at FDA/FEMA whose email address is - brandi.richard-thompson@fema.dhs.gov -

During the course of the week our MediDent Supplies team finalized partnership with one of our suppliers based in Hong Kong to import Rapid Result (15 Minutes at home) Serological COVID-19 Tests. Our manufacturer has already been registered with the FDA and has already registered this test with the FDA as a medical device (FDA docs attached) My company has taken the proactive step of not only sourcing large volume manufacturing capabilities of these tests but also **deploying capital to have thousands of initial units shipped to the USA.** Those funds have been deployed and we have thousands of units inbound to America as we speak.

At this moment I have-not yet submitted a new EUA for the serological tests because we felt that getting alignment with Congressman McCarthy (I live in Tehachapi) and Congressman Gosar (we are based in Queen Creek AZ) before we send another set of documentation to the FDA was critical to getting momentum on this.

Now, based on the most recent FDA guidance I believe we are actually within the law to immediately begin distributing these serological rapid result tests but of course our attorneys are vacillating as attorneys do. Here is the quote from the most recent FDA guidance- " March 16th- Under the update published today, the agency does not intend to object to commercial manufacturers distributing and labs using new commercially developed tests prior to the FDA granting an EUA, under certain circumstances. The FDA is aware that numerous commercial manufacturers are developing tests for coronavirus with the intention of submitting an EUA to the FDA. During this public health emergency, the FDA does not intend to object to the distribution and use of these tests for specimen testing for a reasonable period of time after the manufacturer's validation of the test and while the manufacturer is preparing its EUA request where the manufacturer provides instructions for use of the test and posts data about the test's performance characteristics on the manufacturer's website. As noted in the guidance, the FDA believes that 15 business days is a reasonable period of time to prepare an EUA submission for a test whose performance characteristics have already been validated by the manufacturer." LINK TO FULL RELEASE
- https://www.fda.gov/news-events/press-announcements/coronavirus-covid-19-update-fda-provides-more-regulatory-relief-during-outbreak-continues-help

Here is my request,

I would like to know if first off the FDA will confirm that we can immediately deploy the thousands of tests we have already purchased into the market in the USA. If that is NOT confirmable we would request a copy of ANY OTHER EUA filed for a Serological COVID19 Test in the last 30 days in order to expedite the filing of our EUA right away. Lastly with submission of our EUA we would hope to have as rapid as possible if not immediate approval of the EUA so we can begin helping Americans across the country as fast as possible.

My company is prepared to deploy hundreds of thousands if not millions of tests within weeks, I have access to capital, existing infrastructure, logistics in place and a will to impact that is second to none.

Gratefully,

Joe Snyder, CEO

MediDent Supplies

An NBDR Company

EXHIBIT 10

Shenzhen Minxin Industrial Development Co., Ltd.
1199 Heping Road, Luohu District, Shenzhen 803
Phone 86+13422552700

Client ID USA 2115

Invoice – Protective Isolation Gowns

Cynthia Tanabe, COO
No Borders
18716 E. Old Beau Trl
Queen Creek, AZ 85142 USA
Phone – 602 717 5863

Invoice	# 2002-0307
Date	03/22/20
Due Date	Upon Receipt

Description	Amount
Medical Protective Isolation Gowns	
HC 018; 100 Units @$14.10 CIF per unit	$1,410
HC 019; 1,35100 Units @$13.50 CIF per unit	$1,350
Total Due	$2,760

EXHIBIT 11

NB FNC

Shenzhen Minxin Industrial Development Co., Ltd.
1199 Heping Road, Luohu District, Shenzhen 803
Phone 86+13422552700

Client ID USA 2115

Initial Test Project Wire Transfer

Cynthia Tanabe, COO
No Borders
18716 E. Old Beau Trl
Queen Creek, AZ 85142 USA
Phone Number – 602 717 5863

Invoice #	20200320
Date	03/20/20
Due Date	Upon Receipt

Description	Amount
3,000 N95 DTC3X Med Mask per unit @$2.85 CIF	**$8,550**
3,000 N95 DTC3X Large Mask per unit @$2.85 CIF	**$8,550**
Total	**$17,100**

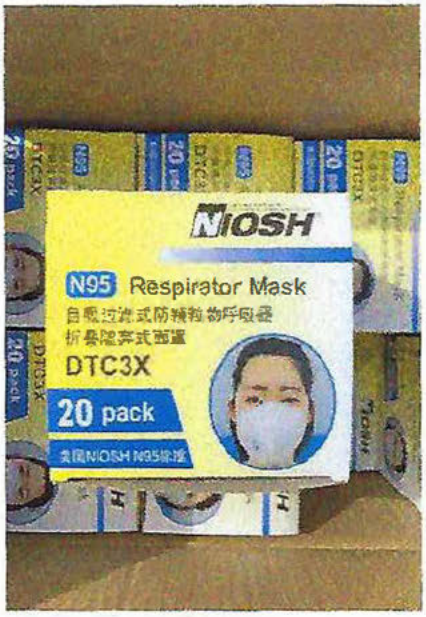

EXHIBIT 12

AITUOIOT

SHENZHEN AITUO IOT TECHNOLOGY CO., LTD

SHENZHEN MAXSHARER IMPORT&EXPORT CO.,LTD

Add No.4 Building,ZhaoFuDa Industry Park,SongGang,BaoAn District,Shenzhen,Guangdong,China

Zip 518105 **TEL** 0086 755 29643710 **FAX** 0086 29081814

Website http //www.automachines.cn http //www.aituolink.com

PROFORMA INVOICE

Company					**P.O**
Address	18716 E Old Beau Trl., Queen Creek Arizona 85142 USA				**Invoice No.**
Attn.	Ms Cynthia Tanabe				**Date**
Tel.					**Trade Term**
Part No.	**Description**		**Quantity**	**Unit**	**Unit Price (EXW) USD**
C06-FS01		* Face shiled Features: * Double anti-fog PET. Thickness:0.04mm * Size: 29*22CM	1200	set	US$0.60
Shipping Cost		DHL Cost	1200	set	US$0.60
Total Amount: ONE THOUSAND HUNDRED ONE HUNDRED AND EIGHTEEN THOUSAND USD ONLY					**Total**

PAYMENT TERMS

100% Full Payment before production

BANK DETAILS

Beneficiary A/C NO: 79969055759

Beneficiary Bank: DBS Bank (Hong Kong) Limited

Swift Code: DHBKHKHH

Beneficiary name: SHENZHEN MAXSHARER MPORT AND EXPORT CO.,LTD

Bank Code: 016

Bank Adress: 11th Floor, The Center, 99 Queen's Road Central, Central, Hong Kong

Branch Code: 478

Note:

All bank charge will be born at customer side

Shipping Date: 3-4 working days after receiving payment.

SO-ATWL2020003220121
3/20/2020
C&F
Amount (USD)
US$720.00
US$398.00
US$1,118.00

EXHIBIT 13

FDA U.S. FOOD & DRUG ADMINISTRATION

Establishment Registration & Device Listing

New Search Back To Search Results

Establishment:
NANJING LIMING BIO-PRODUCTS CO., LTD.
Business Trade Name:
StrongStep

No. 12, Huayuan Road
Nanjing Jiangsu, CN 210042
Registration Number: 3009137327
FEI Number*: 3009137327
Status: Active
Date Of Registration Status: 2020

Owner/Operator:
Nanjing Liming Bio-Products Co , Ltd [6]
No. 12, Huayuan Road
Nanjing, Jiangsu CN 210042
Owner/Operator Number: 10036485[7]

Official Correspondent:
Bright Liu
No. 12, Huayuan Road
Nanjing, Jiangsu CN 210042
Phone: 086-25-85288506

US Agent:
Huiqiang Wang
Nova Clinical Solutions
6792 Solterra Vista Pkwy
San Diego , CA US 92130
Phone: 858 2151688 Ext
Email: Info@Huanuoclinical.Com

* Firm Establishment Identifier (FEI) should be used for identification of entities within the imports message set

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FDA

U.S. Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993
Ph. 1-888-INFO-FDA (1-888-463-6332)
Contact FDA

USA.gov

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6. /scripts/cdrh/cfdocs/cfRL/rl.cfm?start_search=1&establishmentName=®Num=&StateName=&CountryName=&RegistrationNumber=&OwnerOperatorNumber=10036485&OwnerOperato
7. /scripts/cdrh/cfdocs/cfRL/rl.cfm?start_search=1&establishmentName=®Num=&StateName=&CountryName=&RegistrationNumber=&OwnerOperatorNumber=10036485&OwnerOperato

Re: RUSH LA-05142

andrew@coldicuttlaw.com
Apr 01, 2020, 3:02 PM
To: larolitsupport@sec.gov
Cc: enf-cpu@sec.gov, hillan@sec.gov, terceror@sec.gov

Hello Mr. Tercero, and Ms. Hill,

The company that is producing the covid tests that No Borders, Inc. is purchasing is Liming Bio. Here is the link to their website:

http://www.limingbio.com/ & further link to more information:
http://www.limingbio.com/index.php?m=content&c=index&a=show&catid=11&id=114&typeid=58

Yours Truly,

Andrew Coldicutt
Law Office of Andrew Coldicutt
p. 619.228.4970
e. Andrew@ColdicuttLaw.com
w. www.coldicuttlaw.com

On Wed, Apr 01, 2020 at 02:57 PM andrew@coldicuttlaw.com wrote:
Hello Mr. Tercero, and Ms. Hill,

Please find attached supporting documentation for No Borders, Inc.'s efforts to bring in the medical supplies that are currently needed by the medical community. Please also find attached the following items:

- purchase orders and communication with the Department of Health of New Jersey, shipping orders to New Jersey,
- photos of the covid test products that are being shipped out by the Company
- email chains with Congressman Paul Gosar and Kevin McCarthy and their staff
- Purchase Orders to Purchase with Feng Chen Investments, and Stephen Collective, LLC
- Purchase Orders to Sell with Texas Medical Center, Disc-O-Beds, and Aster
- EUA and FDA communications with the Company's EUA / FDA / Import attorney Benjamin England
- Communications with Ocean Transport & Logistical companies for the transporting of the medical supplies
- Emails and Contracts to contract with The WinVale Group, LLC in order to become a partner and use their GSA Schedule 70 Contracts
- Email Discussions with Sansure Biotech to sell their Novel Coronavirus (2019-nCoV) nucleic acid detection kits.

We look forward to speaking with you at 5pm Pacific time today in regards to this matter.

On Wed, Apr 01, 2020 at 01:17 PM larolitsupport@sec.gov wrote:
On Wed, Apr 01, 2020 at 01:17 PM larolitsupport@sec.gov wrote:
Please send RUSH LA-05142 productions to ENF-Centralized Production Unit <ENF-CPU@SEC.GOV>

Roberto A Tercero | Senior Counsel | Enforcement | Securities and Exchange Commission
444 South Flower Street, Suite 900 | Los Angeles, California 90071 | T/323-965-3891 | TerceroR@sec gov <o:p></o:p>

EXHIBIT 14

FACT SHEET FOR HEALTHCARE PROVIDERS

This Fact Sheet informs you of the significant known and potential risks and benefits of the emergency use of the StrongStep® Novel Coronavirus (SARS-CoV-2) Multiplex Real-Time PCR Kit.

The StrongStep® Novel Coronavirus (SARS-CoV-2) Multiplex Real-Time PCR Kit is authorized for use on respiratory specimens collected from individuals suspected of COVID-19 by their healthcare provider.

All patients whose specimens are tested with this assay will receive the Fact Sheet for Patients: StrongStep® Novel Coronavirus (SARS-CoV-2) Multiplex Real-Time PCR Kit.

What are the symptoms of COVID-19?

Many patients with confirmed COVID-19 have developed fever and/or symptoms of acute respiratory illness (e.g., cough, difficulty breathing). However, limited information is currently available to characterize the full spectrum of clinical illness associated with COVID-19. Based on what is known about the virus that causes COVID-19, signs and symptoms may appear any time from 2 to 14 days after exposure to the virus. Based on preliminary data, the median incubation period is approximately 5 days, but may range 2-14 days.

Public health officials have identified cases of COVID-19 infection throughout the world, including the United States, which may pose risks for public health. Please check the CDC webpage for the most up to date information.

What do I need to know about COVID-19 testing?

Current information on COVID-19 for healthcare providers is available at CDC's webpage, *Information for Healthcare Professionals* (see links provided in "Where can I go for updates and more information" section).

- The StrongStep® Novel Coronavirus (SARS-CoV-2) Multiplex Real-Time PCR Kit can be used to test nasopharyngeal swabs, oropharyngeal swabs, Sputum and BALF.

- The StrongStep® Novel Coronavirus (SARS-CoV-2) Multiplex Real-Time PCR Kit should be ordered for the detection of COVID-19 in patients suspected of COVID-19 by their healthcare provider.
- The StrongStep® Novel Coronavirus (SARS-CoV-2) Multiplex Real-Time PCR Kit is only authorized for use in laboratories certified under the Clinical Laboratory Improvement Amendments of 1988 (CLIA), 42 U.S.C. §263a, to perform high complexity tests.

This test is to be performed only using respiratory specimens collected from individuals suspected of COVID-19 by their healthcare provider.

Specimens should be collected with appropriate infection control precautions. Current guidance for COVID-19 infection control precautions are available at the CDC's website (see links provided in "Where can I go for updates and more information" section).

Use appropriate personal protective equipment when collecting and handling specimens from individuals suspected of having COVID-19 as outlined in the CDC *Interim Laboratory Biosafety Guidelines for Handling and Processing Specimens Associated with Coronavirus Disease 2019 (COVID-19)*. For additional information, refer to CDC *Interim Guidelines for Collecting, Handling, and Testing Clinical Specimens from Persons Under Investigation (PUIs) for Coronavirus Disease 2019 (COVID-19) (*see links provided in "Where can I go for updates and more information" section).

What does it mean if the specimen tests positive for the virus that causes COVID-19?

A positive test result for COVID-19 indicates that RNA from SARS-CoV-2 was detected, and the patient is infected with the virus and presumed to be contagious. Laboratory test results should always be considered in the context of clinical observations and epidemiological data in making a final diagnosis and patient management decisions. Patient management should follow current CDC guidelines.

The StrongStep® Novel Coronavirus (SARS-CoV-2) Multiplex Real-Time PCR Kit has been designed to minimize the likelihood of false positive test results. However, in the event of a false positive result, risks to patients could include the following: a recommendation for isolation of the patient, monitoring.of household or other close contacts for symptoms, patient isolation that might limit contact with family or friends and may increase contact with other potentially COVID-19 patients, limits in the ability to work, the delayed diagnosis and treatment for the true infection causing the symptoms, unnecessary prescription of a treatment or therapy, or other unintended adverse effects.

All laboratories using this test must follow the standard testing and reporting guidelines according to their appropriate public health authorities.

What does it mean if the specimen tests negative for the virus that causes COVID-19?

A negative test result for this test means that SARS-CoV-2 RNA was not present in the specimen above the limit of detection. However, a negative result does not rule out COVID-19 and should not be used as the sole basis for treatment or patient management decisions. A negative result does not exclude the possibility of COVID-19.

When diagnostic testing is negative, the possibility of a false negative result should be considered in the context of a patient's recent exposures and the presence of clinical signs and symptoms consistent with COVID-19. The possibility of a false negative result should especially be considered if the patient's recent exposures or clinical presentation indicate that COVID-19 is likely, and diagnostic tests for other causes of illness (e.g., other respiratory illness) are negative. If COVID-19 is still suspected based on exposure history together with other clinical findings, re-testing should be considered by healthcare providers in consultation with public health authorities.

Risks to a patient of a false negative include: delayed or lack of supportive treatment, lack of monitoring of infected individuals and their household or other close contacts for symptoms resulting in increased risk of spread of COVID-19 within the community, or other unintended adverse events.

What is an EUA?

The United States (U.S.) FDA has made this test available under an emergency access mechanism called an Emergency Use Authorization (EUA). The EUA is supported by the Secretary of Health and Human Service's (HHS's) declaration that circumstances exist to justify the emergency use of in vitro diagnostics (IVDs) for the detection and/or diagnosis of the virus that causes COVID-19.

An IVD made available under an EUA has not undergone the same type of review as an FDA-approved or cleared IVD. FDA may issue an EUA when certain criteria are met, which includes that there are no adequate, approved, available alternatives, and based on the totality of scientific evidence available, it is reasonable to believe that this IVD may be effective in the detection of the virus that causes COVID-19.

The EUA for this test is in effect for the duration of the COVID-19 declaration justifying emergency use of IVDs, unless terminated or revoked (after which the test may no longer be used).

EXHIBIT 15


Apr 1, 2020 at 12:28:10 PM
18716 E Old Beau Tra
Queen Creek AZ 8514
United State
ALCOHOL PREP PAD
18716
StrongStep
SARS-CoV-2 IgM/IgG Antibody
Rapid Test

EXHIBIT 16

operating loss carry-forwards in the accompanying financial statements because the Company believes that the realization of the Company's net deferred tax assets of approximately $414,000 was not considered more likely than not and accordingly, the potential tax benefits of the net loss carry-forwards are offset by a full valuation allowance.

Deferred tax assets consist primarily of the tax effect of NOL carry-forwards. The Company has provided a full valuation allowance on the deferred tax assets because of the uncertainty regarding its realization. The valuation allowance increased approximately $24,000 for the year ended December 31, 2019.

Components of deferred tax assets are as follows:

	December 31, 2019
Net deferred tax assets – Non-current:	
Expected income tax benefit from NOL carry-forwards	$ 414,000
Less valuation allowance	(414,000)
Deferred tax assets, net of valuation allowance	$ -

Income Tax Provision in the Consolidated Statements of Operations

A reconciliation of the federal statutory income tax rate and the effective income tax rate as a percentage of income before income taxes is as follows:

	For The Years Ended December 31, 2019 and 2018
Federal statutory income tax rate	(21.0%)
Change in valuation allowance on net operating loss carryforwards	21.0%
Effective income tax rate	0.0%

NOTE 9 – SUBSEQUENT EVENTS

On March 17 , 2020, the Company issued 9,500,000 shares of unrestricted Common Stock to three investors, which are being issued for the purchase price of $95,000 through our Regulation A Offering.

On March 20 , 2020, the Company issued 2,500,000 shares of unrestricted Common Stock to one investor, which are being issued for the purchase price of $25,000 through our Regulation A Offering.

We evaluated subsequent events after the balance sheet date through the date the financial statements were issued. We did not identify any additional material events or transactions occurring during this subsequent event reporting period that required further recognition or disclosure in these financial statements.