

UNITED STATES OF AMERICA
before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 85928 / May 23, 2019

Admin. Proc. File No. 3-18746

In the Matter of

ROYAL B.Y. INVESTMENT MANAGEMENT LLC,
TODA INTERNATIONAL HOLDINGS, INC.,
WESTPOINT ENERGY, INC., and
360 GLOBAL INVESTMENTS
(f/k/a 360 GLOBAL WINE CO.),

Respondents.

ORDER TO SHOW CAUSE AS TO ROYAL B.Y. INVESTMENT MANAGEMENT LLC

The Securities and Exchange Commission issued an Order Instituting Proceedings (“OIP”) on September 12, 2018, pursuant to Section 12(j) of the Securities Exchange Act of 1934, against Royal B.Y. Investment Management LLC, Toda International Holdings, Inc., Westpoint Energy, Inc., and 360 Global Investments (f/k/a 360 Global Wine Co.).¹

On March 22, 2019, the Division of Enforcement filed the Declaration of David S. Frye which stated that, pursuant to Commission Rule of Practice 141(a)(2)(ii),² service of the OIP was made on Royal B.Y. Investment Management LLC on March 21, 2019.³

¹ *Royal B.Y. Inv. Mgmt. LLC*, Exchange Act Release No. 84088, 2018 WL 4347769 (Sept. 12, 2018).

² 17 C.F.R. § 201.141(a)(2)(ii).

³ Service of the OIP was made on Westpoint Energy, Inc., and 360 Global Investments (f/k/a Global Wine Co.) in September 2018, and the Commission previously issued an order to show cause as to them. *Royal B.Y. Inv. Mgmt. LLC*, Exchange Act Release No. 85043, 2019 WL 422631 (Feb. 4, 2019). The Declaration does not mention whether service of the OIP was made on Toda International Holdings, Inc. This order does not apply to Toda International Holdings, Inc.

As stated in the OIP, the answer of respondent Royal B.Y. Investment Management LLC was required to be filed within ten days of service of the OIP.⁴ As of the date of this order, Royal B.Y. Investment Management LLC has not filed an answer. The prehearing conference and the hearing are thus continued indefinitely.

Accordingly, respondent Royal B.Y. Investment Management LLC is ORDERED to SHOW CAUSE by June 6, 2019, why the registration of its securities should not be revoked by default due to its failure to file an answer and to otherwise defend this proceeding. When a party defaults, the allegations in the OIP will be deemed to be true and the Commission may determine the proceeding against that party upon consideration of the record without holding a public hearing.

If respondent Royal B.Y. Investment Management LLC fails to respond to this order to show cause, it may be deemed in default, the proceeding may be determined against it, and its securities may be revoked.⁵ Upon review of the filings in response to this order, the Commission will either direct further proceedings by subsequent order or issue a final order resolving the matter.

For the Commission, by the Office of the General Counsel, pursuant to delegated authority.

Vanessa A. Countryman
Acting Secretary

⁴ Rules of Practice 151(a), 160(b), 220(b), 17 C.F.R. §§ 201.151(a), 160(b), .220(b).

⁵ Rules of Practice 155, 180, 17 C.F.R. § 201.155, .180; *see Royal B.Y. Inv. Mgmt. LLC*, 2018 WL 4347769, at *3 (“If Respondents fail to file the directed Answers, . . . [they] may be deemed in default and the proceedings may be determined against them . . .”).