

UNITED STATES SECURITIES AND EXCHANGE COMMISSION

San Francisco Regional Office 44 Montgomery Street, Suite 2800 San Francisco, CA 94104

DIVISION OF ENFORCEMENT

December 14, 2018

Via Email (david@davidchaselaw.com)

c/o: David Chase, Esq.

Re: In the Matter of

Dear Mr.

We have concluded the investigation as to Based on the information we have as of this date, we do not intend to recommend an enforcement action by the Commission against you. We are providing this notice under the guidelines set out in the final paragraph of Securities Act Release No. 5310, which states in part that the notice "must in no way be construed as indicating that the party has been exonerated or that no action may ultimately result from the staff's investigation." (The full text of Release No. 5310 can be found at: http://www.sec.gov/divisions/enforce/wells-release.pdf.)

Sincerely,

Assistant Director