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Division of Corporation Finance
U.S. Securities and Exchange Commission
100 F Street NE
Washington, DC 20549

VIA ELECTRONIC MAIL Re: Release Nos. 33-10911; 34-90773; File No. S7-24-20

As the CEO of a small public company that trades on the OTC Markets, I fully support the commissions efforts to recharacterize Rule 144 to stop what is known on the OTC Markets as a “death spiral” funding. The ability for any lender to wait the current 180 period before it can re-sell securities has devastated hundreds of OTC companies as serial sales of stock, after the initial 180- day waiting period, causes severe shareholder dilution. The current “tack back” provision harms small public companies like ours because it creates a scenario where there is no investment intent, but rather simply, a short-term loan that gets repaid with the company’s stock after 180 days.

Most, if not all these toxic funders start selling within a few days after holding for 180 days and many of these funders convert and sell out within a matter of weeks, not caring at all whether they make money on a company’s stock appreciation through the hard work of a company’s management team. Their intent is to solely take advantage of the current statute to make money based on their conversion discount.

Thank You

Ken Tapp
CEO