

Freedom Holdings, Inc
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November 30, 2021

John Fieldsend
Sean Harrison
Office of Rulemaking
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

A handwritten signature in black ink, appearing to read "BK", with a long horizontal flourish extending to the right.

Brian Kistler
CEO