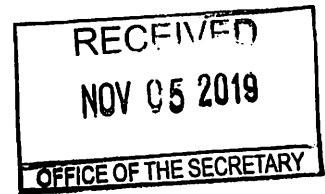


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING
File No. 3-19274

In the Matter of

Capital Trust Holdings, Inc., *et al.*

Respondents.

DIVISION OF ENFORCEMENT'S MOTION FOR
DEFAULT AND BRIEF IN SUPPORT

The Division of Enforcement (“Division”), by counsel, pursuant to Commission Rules of Practice Rules 154(a) and 155(a)(2) respectfully moves the Securities and Exchange Commission (“Commission”) for an order entering a default against Capital Trust Holdings, Inc. (CIK No. 946090) (“Capital Trust”), Florida Gaming Corporation (CIK No. 312065) (“Florida Gaming”), and Go Public, Inc. (CIK No. 1567865) (“Go Public”) (collectively “Respondents”) in this proceeding and ordering the revocation of the registration of each class of Respondents’ securities registered pursuant to Section 12 of the Securities Exchange Act of 1934 (“Exchange Act”).

Argument

On July 24, 2019, the Commission issued an Order Instituting Proceedings (“OIP”) against Respondents which have securities registered with the Commission under Section 12(g) of the Exchange Act. The OIP alleges the Respondents are delinquent in filing their mandated periodic reports. Because each of the Respondents failed to answer or otherwise

respond to the OIP, the Division now seeks entry of an order finding respondents Capital Trust, Florida Gaming, and Go Public. to be in default in this proceeding.

Commission Rule of Practice 220(b) states that where an answer is required to be filed by rule or order, the respondent “shall do so within 20 days after service upon the respondent of the order instituting proceedings” unless a different period is provided by rule or order. Here, the OIP requires “an Answer [to be filed] to the allegations contained in this Order within ten (10) days after service of this Order.” OIP at IV. Commission Rule of Practice 160(a) provides that Saturdays, Sundays and Federal legal holidays are to be counted as part of the 10 day period, and Commission Rule of Practice 160(b) extends that time by three days if service is made by mail.

The Declaration of Gina Joyce to Assist Secretary with Record of Service (attached hereto as Exhibit A) (“Joyce Declaration”) establishes that on July 26, 2019, August 1, 2019 and August 2, 2019, service upon Capital Trust of the OIP, along with a letter from the Commission’s Secretary, and a letter from the Division offering discovery pursuant to Rule of Practice 230 (collectively the “Service Documents”), was attempted by Express Mail delivery at the address provided in its last EDGAR filing with the Commission, in accordance with Commission Rule of Practice 141(a)(2)(ii). Capital Trust’s answer to the OIP was due by Thursday, August 15, 2019. However, Capital Trust has not filed an answer or made any other response to the OIP in this proceeding.

The Joyce Declaration also establishes that on July 26, 2019, Florida Gaming was served with the Service Documents by Express Mail delivery at the address provided in its last EDGAR filing with the Commission, in accordance with Commission Rule of Practice 141(a)(2)(ii). Florida Gaming’s answer to the OIP was due by Thursday, August 8, 2019.

Florida Gaming has not filed an answer or made any other response to the OIP in this proceeding.

The Joyce Declaration additionally establishes that on July 26, 2019, Go Public was served with the Service Documents by Express Mail delivery at the address provided in its last EDGAR filing with the Commission, in accordance with Commission Rule of Practice 141(a)(2)(ii). Go Public's answer to the OIP was due by Thursday, August 8, 2019. Go Public has not filed an answer or made any other response to the OIP in this proceeding

The Respondents at issue are delinquent in their filings with the Commission and have been delinquent for over two years. In addition, the Respondents' failure to answer supports revocation of the registration of each class of the Respondents' securities. Accordingly, the Division moves for an order, pursuant to Rule 155(a)(2), finding these Respondents to be in default in this proceeding and ordering that the registration of each class of their securities registered pursuant to Exchange Act Section 12 be revoked.

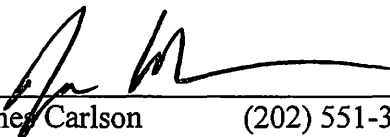
Conclusion

For the reasons set forth above, the Division respectfully requests that the Commission:

1) grant the Division's Motion; 2) enter an order of default against Capital Trust, Florida Gaming, and Go Public; and 3) revoke the registration of each class of their securities registered pursuant to Section 12 of the Exchange Act.

Dated: November 5, 2019

Respectfully submitted,

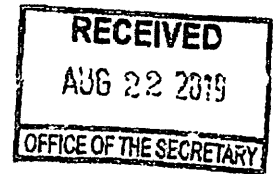


James Carlson (202) 551-3711
Gina Joyce (202) 551-4850
Securities and Exchange Commission
100 F Street, N.E., Room 5120
Washington, D.C. 20549-5010

COUNSEL FOR
DIVISION OF ENFORCEMENT

EXHIBIT A

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING
File No. 3-19274

In the Matter of

Capital Trust Holdings, Inc., *et al.*,

Respondents.

**DECLARATION OF GINA JOYCE
TO ASSIST SECRETARY WITH RECORD OF SERVICE**

GINA JOYCE, pursuant to 28 U.S.C. § 1746, declares:

1. I am a Senior Counsel with the Division of Enforcement (“Division”) of the Securities and Exchange Commission, and co-counsel for the Division in the captioned administrative proceeding. I am submitting this Declaration to assist the Secretary in maintaining a record of service on the respondents in the captioned proceedings pursuant to Rule 141(a)(3).

2. Among other means, Securities and Exchange Commission (“Commission”) Rule of Practice 141(a)(2)(ii) permits service on a corporation or entity by delivering a copy of an Order Instituting Administrative Proceedings (“OIP”) to an agent authorized by appointment or law to receive such service or, in the case of an issuer with a class of securities registered with the Commission, by sending the OIP via U.S. Postal Service certified, registered, or Express Mail and obtaining a confirmation of attempted delivery on the most recent address shown on the entity’s most recent filing with the Commission.

Further, the OIP in this matter authorizes service of the OIP “by any means permitted by the Commission’s Rules of Practice.” Therefore, the Division asked the Commission’s Secretary to first attempt service on the Respondents via U.S. Priority Mail Express.

3. The Office of the Secretary provided me with the U.S. Priority Mail Express tracking numbers for the copies of the Order Instituting Proceedings (“OIP”)¹ that were mailed by the Secretary to the respondents in these proceedings. I input each of the tracking numbers into the U.S. Postal Service’s (“USPS’s”) package tracking system on its Internet website located at www.usps.com, and printed out the tracking confirmations in order to obtain confirmation of the delivery or attempted delivery of the OIP on each respondent. A true copy of the tracking confirmations for all of the respondents for whom express mail service was attempted is attached as Exhibit 1, hereto.

4. The Secretary mailed the OIP to respondent Capital Trust Holdings, Inc., CIK 946090 (“Capital Trust”), via Priority Mail Express, Tracking No. EF 200199030 US, to the address shown on its most recent EDGAR filing at 1501 S. Clinton Street, Baltimore, MD 21224. This address is taken from Capital Trust’s last filing with the Commission, which was a Form 8-K filed with the Commission on June 23, 2014. The USPS tracking system confirms that delivery was attempted on July 26, 2019, August 1, 2019 and August 2, 2019, but it was determined that the address was insufficient. The package was returned to the SEC. *See* Exhibit 1 at p. 2.

5. The Secretary mailed the OIP to respondent Florida Gaming Corporation, CIK 312065 (“Florida Gaming”), via Priority Mail Express, Tracking No. EF 200198992 US, to the address shown on its most recent EDGAR filing at 3500 NW 37th Anenue, Miami,

¹Each service package included the OIP, a letter from the Commission’s Secretary, and a letter from the Division offering discovery pursuant to Rule of Practice 230.

FL 33142. This address is taken from Florida Gaming's last filing with the Commission, which was a Form 8-K filed with the Commission on July 28, 2014. The USPS tracking system confirms that the package was delivered on July 26, 2019. *See* Exhibit 1 at p. 4.

6. The Secretary mailed the OIP to respondent Go Public, Inc., CIK 1567865 ("Go Public"), via Priority Mail Express, Tracking No. EF 200198989 US, to the address shown on its most recent EDGAR filing at 405 Mason Ct. Unit 215, Fort Collins, CO 80524. This address is taken from Go Public's last filing with the Commission, which was a Form 10-Q filed with the Commission on December 16, 2013. The USPS tracking system confirms that the package was delivered on July 26, 2019. *See* Exhibit 1 at p. 6.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 22, 2019.



Gina Joyce

Track Another Package +

Tracking Number: EF200199030US

Remove X

Your item was delivered at 8:26 am on August 5, 2019 in WASHINGTON, DC 20549 to SEC 20549 R26. The item was signed for by T ALVARADO.

 **Delivered**

August 5, 2019 at 8:26 am
Delivered
WASHINGTON, DC 20549

Get Updates ✓

Feedback

Text & Email Updates



Proof of Delivery



Tracking History



August 5, 2019, 8:26 am
Delivered
WASHINGTON, DC 20549

Your item was delivered at 8:26 am on August 5, 2019 in WASHINGTON, DC 20549 to SEC 20549 R26. The item was signed for by T ALVARADO.

August 3, 2019, 11:50 am
Available for Pickup
WASHINGTON, DC 20549

August 3, 2019, 9:03 am
Arrived at Post Office
WASHINGTON, DC 20018

August 3, 2019, 7:11 am
Available for Pickup
WASHINGTON, DC 20549

August 3, 2019, 3:56 am
Arrived at USPS Facility
WASHINGTON, DC 20037

August 2, 2019, 7:45 pm
Departed USPS Regional Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

August 2, 2019, 5:14 pm
Insufficient Address
BALTIMORE, MD 21224

August 1, 2019, 4:54 pm
Insufficient Address
BALTIMORE, MD 21224

July 26, 2019, 12:18 pm
Insufficient Address
BALTIMORE, MD 21224

July 26, 2019, 11:01 am
Return to Sender
BALTIMORE, MD 21224

Feedback

July 26, 2019, 10:07 am
Arrived at Post Office
BALTIMORE, MD 21224

July 25, 2019, 7:32 pm
Arrived at USPS Regional Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

Product Information



See Less ^

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Feedback

Track Another Package +

Tracking Number: EF200198992US

Remove X

Your item was delivered at 11:29 am on July 26, 2019 in MIAMI, FL 33142. The item was signed for by H LEIDYA.

 **Delivered**


July 26, 2019 at 11:29 am
Delivered
MIAMI, FL 33142

Get Updates 

Feedback

Text & Email Updates 

Proof of Delivery 

Tracking History 

July 26, 2019, 11:29 am
Delivered
MIAMI, FL 33142

Your item was delivered at 11:29 am on July 26, 2019 in MIAMI, FL 33142. The item was signed for by H LEIDYA.

July 26, 2019, 9:45 am
Arrived at Post Office
MIAMI, FL 33142

July 26, 2019, 8:08 am
Departed USPS Regional Facility
MIAMI FL DISTRIBUTION CENTER

July 26, 2019, 8:06 am
Arrived at USPS Regional Facility
MIAMI FL DISTRIBUTION CENTER

July 25, 2019, 7:44 pm
Departed USPS Regional Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

July 25, 2019, 7:32 pm
Arrived at USPS Regional Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

Feedback

Product Information



See Less ^

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Track Another Package +

Tracking Number: EF200198989US

Remove X

Your item was delivered in or at the mailbox at 10:45 am on July 26, 2019 in FORT COLLINS, CO 80524.

 **Delivered**

July 26, 2019 at 10:45 am
Delivered, In/At Mailbox
FORT COLLINS, CO 80524

Feedback

Get Updates 

Text & Email Updates 

Proof of Delivery 

Tracking History 

July 26, 2019, 10:45 am
Delivered, In/At Mailbox
FORT COLLINS, CO 80524

Your item was delivered in or at the mailbox at 10:45 am on July 26, 2019 in FORT COLLINS, CO 80524.

July 26, 2019, 9:16 am
Arrived at Post Office
FORT COLLINS, CO 80521

July 26, 2019, 8:57 am
Departed USPS Regional Facility
DENVER CO DISTRIBUTION CENTER

July 26, 2019, 6:52 am
Arrived at USPS Regional Facility
DENVER CO DISTRIBUTION CENTER

July 25, 2019, 7:43 pm
Departed USPS Regional Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

July 25, 2019, 7:32 pm
Arrived at USPS Regional Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

Feedback

Product Information



See Less ^

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Exhibit 1, p. 7

Exh. A, p. 10

CERTIFICATE OF SERVICE

I hereby certify that true copies of the Division of Enforcement's Motion for Default and Brief in Support were served on the following on this 5 day of November, 2019, in the manner indicated below:

By Hand:

Office of the Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-2557

By Certified Mail:

Capital Trust Holdings, Inc.
1501 S. Clinton Street
Baltimore, MD 21224

By Certified Mail:

Florida Gaming Corporation
3500 NW 37th Avenue
Miami, FL 33142

By Certified Mail:

Go Public, Inc.
405 Mason Ct. Unit 215,
Fort Collins, CO 80524


James Carlson