### UNITED STATES OF AMERICA Before the SECURITIES AND EXCHANGE COMMISSION

### ADMINISTRATIVE PROCEEDING File No. 3-19655

In the Matter of

Mongolia Holdings, Inc., et al.

**Respondents.** 

### DIVISION OF ENFORCEMENT'S MOTION FOR <u>DEFAULT AND BRIEF IN SUPPORT</u>

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 Mongolia Holdings, Inc. ("MNHD") (CIK No. 1392960) and against MyGo Games Holding Co. ("MYGG") (CIK No. 1489256) (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 January 14, 2020, 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 the Respondents failed to answer or otherwise respond to the OIP, the Division now seeks entry of an order finding respondents Mongolia Holdings, Inc. and MyGo Games Holding Co. 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 February 27, 2020, service upon MNHD 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). MNHD's answer to the OIP was due by Monday, March 9, 2020. However, MNHD has neither filed an answer nor made any other response to the OIP in this proceeding.

The Joyce Declaration also establishes that on January 17, 2020, service upon MYGG of 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). MYGG's answer to the OIP was due by Thursday, January 30, 2020. MYGG has neither filed an answer nor made any other response to the OIP in this proceeding.

2

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 Mongolia Holdings, Inc. and MyGo Games Holding Co.; and 3) revoke the registration of each class of their securities registered pursuant to Section 12 of the Exchange Act.

Dated: December 17, 2020

Respectfully submitted,

$\sim$	
1-1110	101100
	Joyce
	1100100

David Misler(202) 551-2210Gina Joyce(202) 551-4850Securities and Exchange Commission100 F Street, N.E., Room 5120Washington, D.C. 20549-5010

COUNSEL FOR DIVISION OF ENFORCEMENT

## **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 17th day of December, 2020, in the manner indicated below:

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

By UPS:

Mongolia Holdings, Inc. 2300 West Sahara Drive Las Vegas, NV 89102

By UPS:

MyGo Games Holding Co. 7400 E. Caley Avenue, Suite 190 Centennial, CO 80111

Gina Joyce

Gina Joyce

Γ	RE	CEI	VED
	MAR	02	2020
OF	FICE OF	THES	ECRETARY

### UNITED STATES OF AMERICA Before the SECURITIES AND EXCHANGE COMMISSION

### ADMINISTRATIVE PROCEEDING File No. 3-19655

In the Matter of

Mongolia Holdings, Inc., et al.,

Respondents.

## DECLARATION OF GINA JOYCE CONCERNING SERVICE UPON RESPONDENTS

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")<sup>1</sup> that were mailed by the Secretary to the respondents in these proceedings. I input each of the tracking numbers into the package tracking system for the U.S. Postal Service ("USPS") on its Internet website located at <u>www.usps.com</u>, 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 Mongolia Holdings, Inc., CIK 1392960 ("MNHD"), via Priority Mail Express, Tracking No. EJ 140718035 US, to the address shown on its most recent EDGAR filing at 2300 West Sahara Drive, Las Vegas, NV 89102. This address is taken from MNHD's last filing with the Commission, which was a Form 8-K filed with the Commission on December 29, 2015. The USPS tracking system confirms that delivery was attempted on January 17, 2020. *See* Exhibit 1 at pp. 1 - 2. The USPS tracking system stated that the package was scheduled for redelivery on January 18, 2020, and thereafter no more information was provided by the USPS concerning the package. The Division attempted to ascertain what happened to the package since it was not returned to the SEC. After making several inquiries to the

<sup>&</sup>lt;sup>1</sup>Each 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.

USPS, on February 26, 2020, the Division sent a new package consisting of a copy of the Order Instituting Proceedings in this matter, a letter from the Secretary, a letter from the Division concerning the availability of discovery, and the suspension release to MNHD's address shown on its most recent EDGAR filing, via Priority Mail Express Tracking No. EI 283507782 US. See Exhibit 2. The USPS tracking system confirms that delivery was attempted on February 27, 2020. The addressee was unknown. See Exhibit 3 at pp. 1-2.

5. The Secretary mailed the OIP to respondent MyGo Games Holding Co., CIK 1489256 ("MYGG"), via Priority Mail Express, Tracking No. EJ 140718027 US, to the address shown on its most recent EDGAR filing at 7400 E Caley Avenue, Suite 190. Centennial, CO 80111. This address is taken from MYGG's last filing with the Commission, which was a Form 10-Q filed with the Commission on July 21, 2015. The USPS tracking system confirms that delivery was attempted on January 17, 2020. The addressee had moved, and left no forwarding address. The package was returned to the SEC.. *See* Exhibit 1 at pp. 3 - 6.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 2, 2020.

Aina Jouro

# **USPS Tracking**<sup>®</sup>

Track Another Package +

## Tracking Number: EJ140718035US

Your item was returned to the Post Office for address verification on January 17, 2020 at 10:04 am in LAS VEGAS, NV 89102 because of an incomplete address. Your item will go out for delivery on the next business day if the address can be verified.

# Alert

January 17, 2020 at 10:04 am Rescheduled to Next Delivery Day LAS VEGAS, NV 89102

Get Updates 🗸

**Text & Email Updates** 

**Proof of Delivery** 

**Tracking History** 

January 17, 2020, 10:04 am

Rescheduled to Next Delivery Day

LAS VEGAS, NV 89102

Your item was returned to the Post Office for address verification on January 17, 2020 at 10:04 am in LAS VEGAS, NV 89102 because of an incomplete address. Your item will go out for delivery on the next business day if the address can be verified.

Remove X

Feedback

~

Λ

 $\checkmark$ 

January 17, 2020, 7:04 am Arrived at USPS Facility LAS VEGAS, NV 89146

January 16, 2020 In Transit to Next Facility

January 15, 2020, 11:12 pm Departed USPS Regional Facility LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

January 15, 2020, 7:48 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

Exhibit 1, p. 2 Exhibit A, p. 5

# -----

Exhibit 1, p. 3 Exhibit A, p. 6

# USPS Tracking<sup>®</sup>

## Track Another Package +

## Tracking Number: EJ140718027US

Your item was delivered at 9:45 am on January 21, 2020 in WASHINGTON, DC 20549 to SEC 20549 R26. The item was signed for by C HARRIS.

# **⊘** Delivered

January 21, 2020 at 9:45 am Delivered WASHINGTON, DC 20549

Get Updates 🗸

**Text & Email Updates** 

**Proof of Delivery** 

**Tracking History** 

January 21, 2020, 9:45 am Delivered WASHINGTON, DC 20549 Your item was delivered at 9:45 am on January 21, 2020 in WASHINGTON, DC 20549 to SEC 20549 R26. The item was signed for by C HARRIS.

Remove X

Feedback

 $\checkmark$ 

 $\checkmark$ 

Λ

January 18, 2020, 1:18 pm Available for Pickup WASHINGTON, DC 20549

January 18, 2020, 11:20 am Arrived at Post Office WASHINGTON, DC 20018

January 18, 2020, 10:56 am Available for Pickup WASHINGTON, DC 20549

January 18, 2020, 8:54 am Arrived at USPS Regional Facility WASHINGTON DC V STREET DISTRIBUTION CENTER

January 17, 2020, 3:39 pm Departed USPS Regional Facility DENVER CO DISTRIBUTION CENTER

January 17, 2020, 12:09 pm Moved, Left no Address ENGLEWOOD, CO 80155

January 17, 2020, 9:58 am Out for Delivery ENGLEWOOD, CO 80112

January 17, 2020, 9:48 am Moved, Left no Address ENGLEWOOD, CO 80112

January 17, 2020, 9:47 am Arrived at Post Office ENGLEWOOD, CO 80112

January 16, 2020, 8:18 pm Forwarded DENVER, CO

January 16, 2020, 8:17 pm Arrived at Post Office DENVER, CO 80266

January 16, 2020, 6:40 pm Arrived at USPS Regional Facility DENVER CO DISTRIBUTION CENTER

January 16, 2020, 5:27 pm Arrived at USPS Facility ENGLEWOOD, CO 80112

January 16, 2020, 11:39 am Insufficient Address ENGLEWOOD, CO 80111

January 16, 2020, 9:35 am Arrived at Post Office ENGLEWOOD, CO 80112

January 16, 2020, 9:27 am Departed USPS Regional Facility DENVER CO DISTRIBUTION CENTER

January 16, 2020, 7:53 am Arrived at USPS Regional Facility DENVER CO DISTRIBUTION CENTER

## January 15, 2020, 11:12 pm

Departed USPS Regional Facility LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

January 15, 2020, 7:48 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

/

Exhibit 1, p. 6 Exhibit A, p. 9

EI 2835	2U 56770			XPRI AIL OSTAL SER		Mailing Lak Label 11-B, March Post Office To Address
Date Accepted     Month       Mo.     Day     Year       Time Accepted     AM     Noor       Military     PM     Flat Rate     or Weight	Delivery     I       Date     2nd       Ied     Date       Day     I       Ied     Time of Delivery       Image: Image     Image       Image: Image     Im	Insurance Fee \$ e & Fees Emp. Initials	DELIVERY (PO Delivery Attempt Mo. Day Delivery Attempt Mo. Day Delivery Date Mo. Day CUSTOMERT PAYMENT BY ACCOL Express Mail Corpor Federal Agency Acct. Postal Service Acct. I NO DELIVE Weekend TO: (PLEASE PRINT Mongoli 2 300 Las	STAL US Time Time Time USE ONL INT toliday Holiday Control Phone RY toliday Control Phone Control Phone Control Control Control Control Control Control Control Control Control Control Control Control Control Control Control Contro	E ONLY) AM AM PM AM PM AM PM AM PM AM PM Addition PM A	Employee Signature Employee Signature Employee Signature OF BRANATURE (Domestic Meil Only) In marchandise insurance is void if an uncohandise insurance is

i |

# **USPS Tracking**<sup>®</sup>

Track Another Package +

## Tracking Number: El283507782US

Your item was returned to the sender on February 27, 2020 at 10:22 am in LAS VEGAS, NV 89102 because the addressee was not known at the delivery address noted on the package.

# Alert

February 27, 2020 at 10:22 am Addressee Unknown LAS VEGAS, NV 89102

Get Updates 🗸

Text & Email Updates

**Proof of Delivery** 

**Tracking History** 

**February 27, 2020, 10:22 am** Addressee Unknown LAS VEGAS, NV 89102 Your item was returned to the sender on February 27, 2020 at 10:22 am in LAS VEGAS, NV 89102 because the addressee was not known at the delivery address noted on the package.

Remove X

Feedback



Λ

 $\checkmark$ 

February 27, 2020, 9:23 am Arrived at Post Office LAS VEGAS, NV 89102

**February 27, 2020, 7:39 am** Departed USPS Regional Facility LAS VEGAS NV DISTRIBUTION CENTER

**February 27, 2020, 7:25 am** Arrived at USPS Regional Facility LAS VEGAS NV DISTRIBUTION CENTER

**February 27, 2020, 5:35 am** Departed USPS Regional Facility LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

**February 26, 2020, 8:06 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

Exhibit, p. 2 Exhibit A, p. 12