

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

Securities Exchange Act of 1934
Release No. 94060/January 25, 2022

ADMINISTRATIVE PROCEEDING
File no. 3-20716

In the Matter of
Bare Metal Standard, Inc.
(a/k/a AS Capital, Inc.)

Respondent's Answer to
Order Instituting Proceedings

Respondent

Respondent, Bare Metal Standard, Inc. (a/k/a AS Capital, Inc.), by and through its attorney, Daniel H. Luciano, hereby files its Answer to Order Instituting Administrative Proceedings (“Order”), and states and alleges as follows;

1. Admits the information contained in II.A(1) of the Order.
2. Admits the information contained in II.B(2) of the Order.
3. Admits the information contained in II.B(3) of the Order.
4. Admits the information contained in II.B(4) of the Order.

Dated: February 9, 2022

Respectfully submitted,

/s/ Daniel H. Luciano

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Certificate of Service

The undersigned hereby certifies that Respondent's Answer to Order Instituting Administrative Proceedings has been transmitted via email to Sandhya C. Harris, Division of Enforcement, Securities and Exchange Commission at: harris@sec.gov on this date.

February 9, 2022

/s/ Daniel H. Luciano, Esq.

Daniel H. Luciano, Esq.