

UNITED STATES OF AMERICA  
before the  
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934  
Release No. 88649 / April 15, 2020

Admin. Proc. File No. 3-19745

In the Matter of  
NO BORDERS, INC.

ORDER REQUESTING ADDITIONAL WRITTEN SUBMISSIONS

On April 3, 2020, the Commission issued an order pursuant to Section 12(k) of the Securities Exchange Act of 1934 suspending trading in the securities of No Borders, Inc. (“NBDR”) (CIK No. 0001091418) for the period from 9:30 a.m. EDT, on April 6, 2020 through 11:59 p.m. EDT, on April 20, 2020 (the “Trading Suspension Order”).<sup>1</sup> The Trading Suspension Order stated that it appeared to the Commission that a suspension of trading was required “due to questions and concerns regarding the adequacy and accuracy of publicly available information concerning NBDR including, since at least March 11, 2020, . . . statements about NBDR’s products and business activities related to the COVID-19 pandemic, including NBDR’s COVID-19 specimen collection kits, an agreement to bring COVID-19 test kits to the United States, and NBDR’s activities related to the distribution of personal protective equipment.”<sup>2</sup> The Trading Suspension Order further stated that the “concerns relate to statements NBDR made in: (1) social media posts since at least March 11, 2020; (2) press releases since at least March 16, 2020; (3) NBDR’s website since at least March 24, 2020; and (4) submissions to OTC Markets Group, Inc. since at least March 25, 2020.”<sup>3</sup> The Commission was therefore “of the opinion that the public interest and the protection of investors require a suspension of trading.”<sup>4</sup>

On April 13, 2020, NBDR filed a petition to terminate the trading suspension. In accordance with Rule of Practice 550(b), additional written submissions are requested.<sup>5</sup>

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<sup>1</sup> *No Borders, Inc.*, Exchange Act Release No. 88549, 2020 WL 1686496 (April 3, 2020).

<sup>2</sup> *Id.* at \*1.

<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

<sup>5</sup> 17 C.F.R. § 201.550(b).

Accordingly, IT IS ORDERED that the parties file submissions as follows:

- By April 20, 2020, the Division of Enforcement shall file all the information that was before the Commission at the time of the Trading Suspension Order's issuance.<sup>6</sup>
- By May 4, 2020, NBDR shall file an opening brief, which is not to exceed 8,000 words.
- By May 18, 2020, the Division shall file an answering brief, which is not to exceed 8,000 words.
- By June 1, 2020, NBDR may file an optional reply brief, which is not to exceed 3,000 words.

Any evidentiary materials, such as supporting affidavits or declarations, shall be attached to the briefs, which must contain specific citations to the evidence relied upon. Although appropriately the subject of official notice,<sup>7</sup> the Commission also requests that the parties provide a copy of any guidance document, policy statement, or other government record relied upon to establish the requirements of any applicable legal regime. No briefs in addition to those specified in this order may be filed without leave of the Commission.<sup>8</sup>

Pursuant to Rule of Practice 180(c), a party's failure to file a brief or to comply with this order may result in the Commission's determination of the matter at issue against that party, a finding of waiver, dismissal of the proceeding, or such other sanction as the Commission finds appropriate.<sup>9</sup>

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<sup>6</sup> See 15 U.S.C. § 78l(k)(5). The Division need not disclose privileged legal analysis or sensitive information about the staff's investigative methods.

<sup>7</sup> See Rule of Practice 323, 17 C.F.R. § 201.323.

<sup>8</sup> The briefs shall conform to Rule of Practice 450(b)-(d), with respect to content and length limitations, 17 C.F.R. § 201.450(b)-(d), except as modified in this order. Attention is also called to Rules of Practice 150-153, 17 C.F.R. §§ 201.150-153, and the Commission's March 18, 2020 order regarding the filing and service of papers in administrative proceedings. *Pending Administrative Proceedings*, Exchange Act Release No. 88415, 2020 WL 1322001 (Mar. 18, 2020), <https://www.sec.gov/litigation/opinions/2020/33-10767.pdf>. We note that, in its petition, NBDR agreed to waive paper service of all opinions and orders and accept service electronically.

<sup>9</sup> 17 C.F.R. § 201.180(c).

For the Commission, by the Office of the General Counsel, pursuant to delegated authority.

Vanessa A. Countryman  
Secretary