



December 23, 2016

Mr. Ty Clevenger
21 Bennet Avenue #62
New York, New York 10033
tyclevenger@yahoo.com

Dear Mr. Clevenger:

This letter responds to your letter of December 13, 2016.

During the period 2011 – November 2015, the Company sold shares via private offerings pursuant to exemptions from SEC registration under Reg D and Section 4(2) of the Securities Act of 1933, as amended. Persons who invested in a particular investment “round” invested on the same terms, regardless of identity.

The shares sold during this period were sold for \$.10 per share, which is now equivalent to \$5.00 per share following a 50 - 1 reverse stock split in November 2015.

The shares sold during this period were subject to two material liquidity limitations, as follows:

- the shares were sold in a “private offering.” This means the shares could not be sold or otherwise transferred for six months following the purchase date.
- the shares traded, when originally issued, on the OTC market, and for practical purposes were generally considered “illiquid.”

Since November 2015, when the shares began trading on the NASDAQ market, the stock’s trading price has ranged from approximately \$2.80 - \$.59 per share. The shares closed at \$.85 per share on December 22, 2016.

In sum, the purchase of an illiquid stock at a price nearly 80% higher than the highest price the stock has traded in the last 13 months conferred no untoward economic benefit.

Please advise if you have any further questions in this regard.

Very truly yours,

Ronald A. Woessner
Chief Executive Officer