

UNITED STATES OF AMERICA
before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Rel. No. 64637 / June 9, 2011

Admin. Proc. File No. 3-14256

In the Matter of

GLOBAL SENTRY EQUITY TRANSFER, INC.

ORDER AMENDING ORDER INSTITUTING PROCEEDINGS

On February 14, 2011, the Commission issued an Order Instituting Proceedings ("OIP") in the matter of Global Sentry Equity Transfer, Inc. ("Global Sentry"), a registered transfer agent. On March 15, 2011, the Division moved to amend the OIP to include additional allegations related to alleged misconduct by Global Sentry that the Division learned of after the OIP had been issued. As discussed below, we have determined to grant the motion.

I.

In the OIP, the Division alleges that Global Sentry failed to keep certain required records required to be maintained by registered transfer agents, including cancelled stock certificates and master securityholder files, and to timely file reports on Form TA-2 for the years ended December 31, 2008 and December 31, 2009. The Division further alleges in the OIP that Global Sentry thereby violated Sections 17(a)(1) and 17A(d)(1) of the Securities Exchange Act of 1934 and Rules 17Ad-6, 17Ad-7, 17Ad-10, 17Ad-19, and 17Ac2-2 thereunder.¹ The OIP orders the institution of proceedings to determine whether these charges are true and if so, what, if any, remedial action is appropriate in the public interest, including but not limited to disgorgement and civil penalties, and whether Global Sentry should be ordered to cease and desist from committing or causing violations or future violations of these provisions.

¹ 15 U.S.C. §§ 78q(a)(1), 78q-1(d)(1) and 17 C.F.R. §§ 240.17Ad-6, .17Ad-7, .17Ad-10, .17Ad-19, .17Ac2-2.

On February 15, a hearing officer was designated and the hearing in this matter was scheduled to begin on March 28. On March 2, Division staff requested an adjournment of the hearing due to the staff's inability to confirm that Global Sentry had been served with the OIP. On March 8, however, the Office of the Secretary sent the Division a signed, certified mail receipt showing that Global Sentry had been served with the OIP on March 3 through its registered corporate agent in Nevada.²

II.

In its motion to amend, the Division makes the following assertions about events occurring on February 7-8, 2001: On February 7, the Office of Compliance Inspections and Examinations commenced a cause examination of Global Sentry, based in part on a complaint posted on the Commission's Tips, Complaints and Referrals System. Also on February 7, OCIE staff visited Global Sentry's offices in Mississauga, Ontario, Canada. A Global Sentry representative told the staff to contact an attorney (the "Global Attorney"). The Global Attorney, when reached by telephone later that day, told the staff that Global Sentry "respectfully decline[d the] request to come and examine" it.³ Later that day, a Global Sentry receptionist told OCIE staff that Global Sentry was no longer taking visitors that afternoon, and asked the staff to leave the premises.

Later on February 7, OCIE staff again contacted the Global Attorney to confirm both that Global Sentry understood the seriousness of refusing an OCIE examination and that Global Sentry's refusal was final and definitive. The Global Attorney affirmed that his client would not permit the examination. On February 8, the Global Attorney sent OCIE a letter that further confirmed that he had advised his client not to cooperate with the OCIE examination.⁴

² The Division states that, on March 10, Division staff sent Global Sentry a letter offering its investigative file for inspection, pursuant to Rule of Practice 230. As of March 15, when the Division filed its motion to amend the OIP, Global Sentry had not contacted the Division to arrange to inspect the file.

³ According to the Division, the Global Attorney stated that the OCIE examination would be "improper" in light of anticipated administrative proceedings against Global Sentry. The Division states that Division staff had informed the Global Attorney of impending proceedings after the Commission had authorized the instant proceedings, but before the OIP had been issued.

⁴ The Division states that the Global Attorney advised his client not to cooperate on the basis that the examination represented an improper attempt by Commission staff to engage in litigation discovery.

The Division states that on February 17, OCIE referred to the Division its finding that Global Sentry had violated Section 17(b)(1) of the Exchange Act⁵ by refusing to submit to the OCIE examination.

III.

Rule of Practice 200(d)(1) provides that the Commission may at any time, upon motion by a party, amend an OIP to include new matters of fact and law.⁶ The allegations that Global Sentry refused to permit OCIE to conduct an examination on February 7, 2011 involve new matters of both fact and law. The Division asserts, however, that the proposed amendment would "permit the Division to seek the same relief for this new violation that it already seeks for the existing claims against Global Sentry: a cease-and-desist order; disgorgement, if any; civil money penalties pursuant to Section 21B of the Exchange Act; and a determination of what, if any, other remedial action is in the public interest." If the OIP is not amended to include these new allegations, the Division may seek to commence a separate administrative proceeding against Global Equity based on the alleged violation of Exchange Act Section 17(b)(1). It appears that considering the new allegations together with the allegations in the OIP in a single proceeding would be more efficient than conducting separate proceedings. Initiating a second proceeding would require additional Division and hearing officer resources, and perhaps Commission resources as well.⁷ Amending the OIP would not appear to prejudice Global Sentry, which has not yet filed an answer and has not filed an opposition to the motion to amend.

Accordingly, IT IS ORDERED that the Order Instituting Proceedings issued in the matter of Global Sentry Equity Transfer, Inc. on February 14, 2011 be, and it hereby is, amended to include allegations of a violation of Section 17(b)(1) of the Securities Exchange Act of 1934, as provided in the form attached hereto.

By the Commission.

Elizabeth M. Murphy
Secretary

⁵ 15 U.S.C. § 78q(b)(1).

⁶ 17 C.F.R. § 201.200(d)(1).

⁷ See Rule of Practice 201.103, 17 C.F.R. § 201.103(a) ("The Rules of Practice shall be construed and administered to secure the just, speedy, and inexpensive determination of every proceeding.").

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934

Release No.

ADMINISTRATIVE PROCEEDING

File No. 3-14256

In the Matter of

**GLOBAL SENTRY EQUITY
TRANSFER, INC.,**

Respondent.

**AMENDED ORDER
INSTITUTING
ADMINISTRATIVE AND
CEASE-AND-DESIST
PROCEEDINGS PURSUANT TO
SECTIONS 17A(c)(3) AND 21C
OF THE SECURITIES
EXCHANGE ACT OF 1934**

I.

The Securities and Exchange Commission (“Commission”) deems it appropriate and in the public interest that public administrative and cease-and-desist proceedings be, and hereby are, instituted pursuant to Sections 17A(c)(3) and 21C of the Securities Exchange Act of 1934 (“Exchange Act”) against Global Sentry Equity Transfer, Inc. (“Respondent” or “Global Sentry”).

II.

After an investigation, the Division of Enforcement alleges that:

A. RESPONDENT

1. **Global Sentry Equity Transfer, Inc. (“Global Sentry”)** is a Nevada corporation with its principal place of business in Ontario, Canada. Global Sentry has been registered with the Commission as a transfer agent since July 30, 2007, pursuant to Section 17A of the Exchange Act. During 2008, Global Sentry was the transfer agent of record for, among other entities, Infinity Medical Group, Inc. (“Infinity”), Cannon Exploration Inc. (“Cannon”), and China Jiangsu Golden Horse Steel Ball Inc. (“China Jiangsu”).

B. OTHER RELEVANT PERSON AND ENTITIES

1. Christopher Wheeler, age 43, is a resident of Victor, New York. He is the owner of OTCStockExchange.com, a stock promotion website. Wheeler does not hold any securities licenses, and is not associated with any entity that is registered with the Commission.

2. Infinity was incorporated in Nevada in 1989 as D.V. Holdings, Inc. Between June 1999 and August 2007, the company operated at various times under the names Iceberg Corporation of America, Royal Alliance Entertainment, Inc., and Infinity. Infinity purports to be a specialty healthcare company and initially listed its principal place of business as Ontario, Canada. During the relevant period, Infinity did not have a class of securities registered under the Exchange Act and did not register any offering of securities under the Securities Act. During the relevant period, Infinity's shares were quoted on the Pink Sheets operated by Pink OTC Markets Inc. ("Pink Sheets").

3. Cannon was incorporated in Delaware in 1983 as Citisource, Inc. ("Citisource"). In June 2006, the company changed its name from Citisource to China Shuangji Cement Corporation, but changed it back to Citisource in October 2007. In April 2008, the company changed its name to Cannon. Cannon purports to be a mining and exploration company and listed its principal place of business as Ontario, Canada. During the relevant period, Cannon did not have a class of securities registered under the Exchange Act and did not register any offering of securities under the Securities Act. During the relevant period, Cannon's shares were quoted on the Pink Sheets.

4. China Jiangsu was incorporated in Nevada in 1999 as Puppettown.com, Inc. The company changed its name to Business Translation Services, Inc. in December 2001, to Muller Media, Inc. in February 2002, and to China Jiangsu in October 2007. Since late 2008, the company has operated as Santana Mining, Inc. During the relevant period, the company's principal place of business was China, and it purported to be a manufacturer and supplier of ball bearings. During the relevant period, China Jiangsu did not have a class of securities registered under the Exchange Act and did not register any offering of securities under the Securities Act. During the relevant period, China Jiangsu's shares were quoted on the Pink Sheets.

C. GLOBAL SENTRY'S FAILURE TO COMPLY WITH EXCHANGE ACT PROVISIONS CONCERNING TRANSFER AGENTS

1. In at least 2008, Infinity, Cannon, and China Jiangsu issued a total of approximately 3.5 million purportedly unrestricted shares to Wheeler. Global Sentry, acting in its capacity as transfer agent, issued stock certificates in Wheeler's name, which Wheeler's brokerage firm credited to Wheeler's account and from which Wheeler subsequently sold the shares. Specifically, Global Sentry failed to comply with the Exchange Act and related rule provisions as follows:

a. Section 17(a)(1) of the Exchange Act requires, in relevant part, that "[e]very . . . registered transfer agent . . . shall make and keep for prescribed periods such

records, furnish such copies thereof, and make and disseminate such reports as the Commission, by rule, prescribes as necessary or appropriate in the public interest, for the protection of investors, or otherwise in furtherance of the purposes of this [Act].” Section 17A(d)(1) of the Exchange Act provides, in relevant part, that “[n]o . . . registered transfer agent shall, directly or indirectly, engage in any activity as . . . [a] transfer agent in contravention of such rules and regulations [] as the Commission may prescribe as necessary or appropriate in the public interest, for the protection of investors, or otherwise in furtherance of the purposes of [the Act]. . . .” Pursuant to this authority, the Commission adopted Rules 17Ad-6, 17Ad-7, 17Ad-10, 17Ad-19 and 17Ac2-2.

b. Exchange Act Sections 17(a)(1) and 17A(d)(1) and Rule 17Ad-6(c) thereunder require that, “every registered transfer agent which, under the terms of its agency, maintains securityholder records for an issue shall, with respect to such issue, retain each cancelled registered bond, debenture, share, warrant or right, other registered evidence of indebtedness, or other certificate of ownership and all accompanying documentation, except legal papers returned to the presenter.” Under these provisions, Global Sentry was required to maintain cancelled stock certificates. Global Sentry admitted that it is “not in possession of any documentation concerning Wheeler” Global Sentry failed to maintain cancelled stock certificates relating to the sale of Infinity, Cannon, and China Jiangsu shares issued to Wheeler as required under Rule 17Ad-6.

c. Exchange Act Sections 17(a)(1) and 17A(d)(1) and Rule 17Ad-7(d) thereunder require that “the records required under Rule 17Ad-6(c) shall be maintained for a period of not less than six years” Under this Rule, to the extent that Global Sentry failed to maintain documents as required under 17Ad-6(c) identified in paragraph b. above, Global Sentry was required to maintain cancelled Infinity, Cannon, and China Jiangsu stock certificates that it issued to Wheeler for not less than six years. Global Sentry admitted that it is “not in possession of any documentation concerning Wheeler” Global Sentry failed to maintain cancelled stock certificates relating to the sale of Infinity, Cannon, and China Jiangsu shares issued to Wheeler as required under Rule 17Ad-7.

d. Exchange Act Sections 17(a)(1) and 17A(d)(1) and Rule 17Ad-10(a)(1) thereunder require that “[e]very recordkeeping transfer agent shall promptly and accurately post to the master securityholder file debits and credits containing minimum and appropriate certificate detail representing every security transferred, purchased, redeemed or issued; *Provided, however,* That if a security transferred or redeemed contains certificate detail different from that currently posted to the master securityholder file, the credit shall be posted to the master securityholder file and the debit and related certificate detail shall be maintained in a subsidiary file until resolved.” Rule 17Ad-10(b) requires that “every recordkeeping transfer agent shall maintain and keep current an accurate master securityholder file. . . .” Global Sentry admitted that it is “not in possession of any documentation concerning Wheeler” Global Sentry failed to maintain accurate “master securityholder files” as required under Rule 17Ad-10.

e. Exchange Act Sections 17(a)(1) and 17A(d)(1) and Rule 17Ad-19(b) thereunder require registered transfer agents “involved in the handling, processing, or storage of securities certificates [to] establish and implement written procedures for the cancellation, storage, transportation, destruction, or other disposition of securities certificates.” Rule 17Ad-19(d) provides that a transfer agent “shall maintain records that demonstrate compliance with the requirements set forth” under Rule 17Ad-19. Global Sentry admitted that it is “not in possession of any documentation concerning Wheeler” Global Sentry failed to maintain records as required under Rule 17Ad-19, in particular the stock certificates relating to the transfer of Infinity, Cannon, and China Jiangsu shares issued to Wheeler.

f. Exchange Act Section 17(b)(1) requires that registered transfer agents “are subject at any time, or from time to time, to such reasonable periodic, special, or other examinations by representatives of the Commission and the appropriate regulatory agency for such persons as the Commission and the appropriate regulatory agency for such persons deems necessary or appropriate in the public interest, for the protection of investors, or otherwise in furtherance of the purposes of this title.” Global Sentry violated Section 17(b)(1) of the Exchange Act by refusing to allow an on-site examination of its transfer agent records on February 7, 2011, by the staff of the Commission’s Office of Compliance Inspections and Examinations.

g. Exchange Act Sections 17(a)(1) and 17A(d)(1) and Exchange Act Rule 17Ac2-2(a) require every transfer agent registered on December 31 to file a report covering the reporting period on Form TA-2 by March 31 following the end of the reporting period. Global Sentry has failed to make timely filings for the years ended December 31, 2008, and December 31, 2009, as required.

D. VIOLATIONS

1. As a result of the conduct described above, Global Sentry willfully violated Sections 17(a)(1), 17(b)(1), and 17A(d)(1) of the Exchange Act and Rules 17Ad-6, 17Ad-7, 17Ad-10, 17Ad-19, and 17Ac2-2 thereunder.

III.

In view of the allegations made by the Division of Enforcement, the Commission deems it necessary and appropriate in the public interest that public administrative and cease-and-desist proceedings be instituted to determine:

A. Whether the allegations set forth in Section II hereof are true and, in connection therewith, to afford Respondent an opportunity to establish any defenses to such allegations;

B. What, if any, remedial action is appropriate in the public interest against Global Sentry pursuant to Section 17A(c)(3) of the Exchange Act including, but not limited to, disgorgement, if any, and civil penalties pursuant to Section 21B of the Exchange Act;

C. Whether, pursuant to Section 21C of the Exchange Act, Respondent should be ordered to cease and desist from committing or causing violations of, and any future violations of, Sections 17(a)(1), 17(b)(1), and 17A(d)(1) of the Exchange Act and Rules 17Ad-6, 17Ad-7, 17Ad-10, 17Ad-19, and 17Ac2-2 thereunder.

IV.

IT IS ORDERED that a public hearing for the purpose of taking evidence on the questions set forth in Section III hereof shall be convened not earlier than 30 days and not later than 60 days from service of this Order at a time and place to be fixed, and before an Administrative Law Judge to be designated by further order as provided by Rule 110 of the Commission's Rules of Practice, 17 C.F.R. § 201.110.

IT IS FURTHER ORDERED that Respondent shall file an Answer to the allegations contained in this Order within twenty (20) days after service of this Order, as provided by Rule 220 of the Commission's Rules of Practice, 17 C.F.R. § 201.220.

If Respondent fails to file the directed answer, or fails to appear at a hearing after being duly notified, the Respondent may be deemed in default and the proceedings may be determined against it upon consideration of this Order, the allegations of which may be deemed to be true as provided by Rules 155(a), 220(f), 221(f) and 310 of the Commission's Rules of Practice, 17 C.F.R. §§ 201.155(a), 201.220(f), 201.221(f) and 201.310.

This Order shall be served forthwith upon Respondent personally or by certified mail.

IT IS FURTHER ORDERED that the Administrative Law Judge shall issue an initial decision no later than 300 days from the date of service of this Order, pursuant to Rule 360(a)(2) of the Commission's Rules of Practice.

In the absence of an appropriate waiver, no officer or employee of the Commission engaged in the performance of investigative or prosecuting functions in this or any factually related proceeding will be permitted to participate or advise in the decision of this matter, except as witness or counsel in proceedings held pursuant to notice. Since this proceeding is not "rule making" within the meaning of Section 551 of the Administrative Procedure Act, it is not deemed subject to the provisions of Section 553 delaying the effective date of any final Commission action.

By the Commission.

Elizabeth M. Murphy
Secretary