

F110000003916

(Requestor's Name)

(Address)

(Address)

(City/State/Zip/Phone #)

☐ PICK-UP

☐ WAIT

☐ MAIL

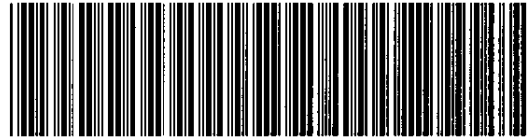
(Business Entity Name)

(Document Number)

Certified Copies _____ Certificates of Status _____

Special Instructions to Filing Officer:

Office Use Only



100212271361

09/19/11--01036--007 **70.00

FILED
SECRETARY OF STATE
DIVISION OF CORPORATIONS
11 SEP 30 PM 1:12

W11-48486
am alzo/11

FILED
SECRETARY OF STATE
DIVISION OF CORPORATIONS
11 SEP 30 PM 1:12

Per our conversation on 9/28/2011, Dalton Strategic is requesting that the State of Florida abate the fees and penalties that you related in Letter 811A00021714. As I related to you, we filed for securities registration 14 years ago with the Division of Securities. Nowhere in the filing requirements did the Division ask that we, or require that we, file with the Division of Corporations. We operate in over 35 states, and as I'm sure you can imagine, it would be impossible for a firm of our size to read through 35 different state statutes, both for securities and corporations, as well as any other state entity that may have jurisdiction. Each of our representatives is an independent contractor, so to the extent that we conduct business in Florida, we do so through an intermediary at arm's length. We do not maintain branches in Florida; each representative has exclusive responsibility for all costs associated with their respective branch, including filing, registration and license fees. *

We explicitly followed the guidance of the Division of Securities when registering in Florida. As such, we were granted registration in 1997. Since then, we have interacted with the State of Florida in a number of different respects and not once was it mentioned that we should register with the Division of Corporations. We filed a form BD, a form U-2, Consent to Service of Process, and it makes no mention of this requirement. The U-2A, which is the Uniform Corporate Resolution, doesn't mention it either. We feel quite strongly that when we register within a state, the securities division from that state has the understood authority to grant us licensure. We rely on that guidance when conducting business and not once in 14 years did we hear a single mention that we were not compliant. I've had discussions with several regulators from Florida over the years and again, not one word was spoken about this requirement. To date, I see NO MENTION of it on the securities website. We feel that we justifiably relied on the Division of Securities to give us proper and complete requirements when they approved us. We were told by a person within the securities division a month ago that in order to open a new branch, we needed to register. We did so immediately, upon learning of the request. We have no objection to maintaining our corporation within state guidelines, and work hard to do so everywhere we are. However, to come back after 14 years, several branches, countless talks with representatives of the state and seek penalize us is both arbitrary and capricious. We respectfully request that the fines be abated.

If you or a member of the staff would like to discuss this further, please call me at 765-445-7000.

Regards,

Steve Dalton
Managing Partner, Dalton Strategic

* EXEMPT under 607.1501(2)(c), F.S.

This message is confidential and intended for the use of the designated recipient(s) named above. If you are not the intended recipient, any review, dissemination, distribution or copying of this message is strictly prohibited. This communication is for information purposes only and should not be regarded as an offer to sell or as a solicitation of an offer to buy any financial products, an official confirmation of any transaction, or as an official statement of Dalton Strategic Investment Services, Inc. and its affiliates. Email transmission cannot be guaranteed to be secure or error-free. Therefore, we do not represent that this information is complete or accurate and it should not be relied upon as such. All information is subject to change without notice.

Member FINRA, MSRB & SIPC

COVER LETTER

TO: New Filing Section
Division of Corporations

SUBJECT: DALTON STRATEGIC INVESTMENT SERVICES INC.
Name of corporation - must include suffix

Dear Sir or Madam:

The enclosed "Application by Foreign Corporation for Authorization to Transact Business in Florida," "Certificate of Existence," or "Certificate of Good Standing" and check are submitted to register the above referenced foreign corporation to transact business in Florida.

Please return all correspondence concerning this matter to the following:

STEVE DALTON

Name of Person

DALTON STRATEGIC INVESTMENT SERVICES INC.

Firm/Company

26 N. WASHINGTON ST.

Address

KNIGHTSTOWN, IN 46148

City/State and Zip code

SDALTON@INVESTMONEY.NET

E-mail address: (to be used for future annual report notification)

For further information concerning this matter, please call:

STEVE DALTON

Name of Person

at (765) 445-7000

Area Code & Daytime Telephone Number

STREET/COURIER ADDRESS:

New Filing Section
Division of Corporations
Clifton Building
2661 Executive Center Circle
Tallahassee, FL 32301

MAILING ADDRESS:

New Filing Section
Division of Corporations
P.O. Box 6327
Tallahassee, FL 32314

Enclosed is a check for the following amount:

☒ \$70.00 Filing Fee ☐ \$78.75 Filing Fee & Certificate of Status ☐ \$78.75 Filing Fee & Certified Copy ☐ \$87.50 Filing Fee, Certificate of Status & Certified Copy



FLORIDA DEPARTMENT OF STATE
Division of Corporations

September 20, 2011

STEVE DALTON
26 N WASHINGTON ST
KNIGHTSTOWN, IN 46148

SUBJECT: DALTON STRATEGIC INVESTMENT SERVICES INC.
Ref. Number: W11000048486

We have received your document for DALTON STRATEGIC INVESTMENT SERVICES INC. and your check(s) totaling \$70.00. However, the enclosed document has not been filed and is being returned for the following correction(s):

According to the application submitted to this office, this entity transacted business in the state of Florida before properly registering with the Florida Department of State, Division of Corporations. Consequently, a \$500 civil penalty and an annual report filing fee for each year the entity failed to properly file a Florida annual report are due this office. Based on the date entered on the application, the civil penalty and annual report filing fees total \$2615.00.

Please return your document, along with a copy of this letter, within 60 days or your filing will be considered abandoned.

If you have any questions concerning the filing of your document, please call (850) 245-6901.

Pamela Smith
Regulatory Specialist II

Letter Number: 811A00021714

**APPLICATION BY FOREIGN CORPORATION FOR AUTHORIZATION TO TRANSACT
BUSINESS IN FLORIDA**

IN COMPLIANCE WITH SECTION 607.1503, FLORIDA STATUTES, THE FOLLOWING IS SUBMITTED TO
REGISTER A FOREIGN CORPORATION TO TRANSACT BUSINESS IN THE STATE OF FLORIDA.

1. DALTON STRATEGIC INVESTMENT SERVICES INC.

(Enter name of corporation; must include "INCORPORATED," "COMPANY," "CORPORATION,"
"Inc.," "Co.," "Corp.," "Inc.," "Co.," or "Corp.")

(If name unavailable in Florida, enter alternate corporate name adopted for the purpose of transacting business in Florida)

2. INDIANA

(State or country under the law of which it is incorporated)

3. 35-1749898

(FEI number, if applicable)

4. 05/1988

(Date of incorporation)

5. PERPETUAL

(Duration: Year corp. will cease to exist or "perpetual")

6. 04/1997 Exempt under 607.1501(2)(e), F.S.

(Date first transacted business in Florida, if prior to registration)
(SEE SECTIONS 607.1501 & 607.1502, F.S., to determine penalty liability)

7. 26 N. WASHINGTON ST. KNIGHTSTOWN, IN 46148

(Principal office address)

26 N. WASHINGTON ST. KNIGHTSTOWN, IN 46148

(Current mailing address)

8. SECURITIES BUSINESS

(Purpose(s) of corporation authorized in home state or country to be carried out in state of Florida)

9. Name and street address of Florida registered agent: (P.O. Box NOT acceptable)

Name: SHIRLEY C. DALTON

Office Address: 9141 Los Lagos Ct., Unit 101

Bonita Springs

(City)

, Florida 34135

(Zip code)

FILED
SECRETARY OF STATE
DIVISION OF CORPORATIONS
11 SEP 30 PM 1:12

10. Registered agent's acceptance:

Having been named as registered agent and to accept service of process for the above stated corporation at the place designated in this application, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relative to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent.

Shirley C. Dalton

(Registered agent's signature)

11. Attached is a certificate of existence duly authenticated, not more than 90 days prior to delivery of this application to the Department of State, by the Secretary of State or other official having custody of corporate records in the jurisdiction under the law of which it is incorporated.

12. Names and business addresses of officers and/or directors:

A. DIRECTORS

Chairman: STEVE DALTON

Address: 26 N. WASHINGTON ST.
KNIGHTSTOWN, IN 46148

Vice Chairman: _____

Address: _____

Director: _____

Address: _____

Director: _____

Address: _____

B. OFFICERS

President: STEVE DALTON

Address: 26 N. WASHINGTON ST.
KNIGHTSTOWN, IN 46148

Vice President: _____

Address: _____

Secretary: _____

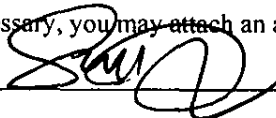
Address: _____

Treasurer: _____

Address: _____

NOTE: If necessary, you may attach an addendum to the application listing additional officers and/or directors.

13. _____

 DIRECTOR
Signature of Director or Officer

The officer or director signing this document (and who is listed in number 12 above) affirms that the facts stated herein are true and that he or she is aware that false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S.

14. STEVE DALTON PRESIDENT

(Typed or printed name and capacity of person signing application)

FILED
SECRETARY OF STATE
DIVISION OF CORPORATIONS
11 SEP 30 PM 1:12

STATE OF INDIANA
OFFICE OF THE SECRETARY OF STATE
CERTIFICATE OF EXISTENCE

FILED
SECRETARY OF STATE
DIVISION OF CORPORATIONS
11 SEP 30 PM 1:12

To Whom These Presents Come, Greetings:

I, Charles P. White, Secretary of State of Indiana, do hereby certify that I am, by virtue of the laws of the State of Indiana, the custodian of the corporate records, and proper official to execute this certificate.

I further certify that records of this office disclose that

DALTON STRATEGIC INVESTMENT SERVICES, INC.

duly filed the requisite documents to commence business activities under the laws of State of Indiana on May 19, 1988, and was in existence or authorized to transact business in the State of Indiana on August 23, 2011.

I further certify this For-Profit Domestic Corporation has filed its most recent report required by Indiana law with the Secretary of State, or is not yet required to file such report, and that no notice of withdrawal, dissolution or expiration has been filed or taken place.



In Witness Whereof, I have hereunto set my hand and affixed the seal of the State of Indiana, at the city of Indianapolis, this Twenty-Third Day of August, 2011.

Charles P. White

Charles P. White, Secretary of State

1988050829 / 2011082325694