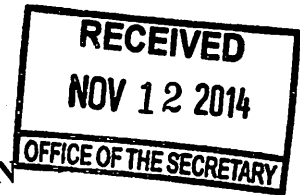


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING
File No. 3-16260

In the Matter of

Brandeis Holdings, Inc., *et al.*,

Respondents.

**DECLARATION OF NEIL J. WELCH, JR.
TO ASSIST SECRETARY WITH RECORD OF SERVICE**

NEIL J. WELCH, JR., pursuant to 28 U.S.C. § 1746, declares:

1. I am a Senior Investigations Counsel with the Division of Enforcement (“Division”) of the Securities and Exchange Commission, and co-counsel for the Division in the above-captioned administrative proceeding. I am submitting this Declaration to assist the Secretary in maintaining a record of service on the respondents in the above-captioned proceedings pursuant to Rule 141(a)(3).

2. The Office of the Secretary provided me with the Priority Mail Express tracking numbers for the copies of the Order Instituting Proceedings (“OIP”) that were mailed by the Secretary to the respondents in this proceeding. I input each of the tracking numbers into the U.S. Postal Service’s package tracking system on its Internet website located at www.usps.com, and printed out the tracking confirmations in order to obtain confirmation of the delivery or attempted delivery of the OIP on each respondent. Rule 141(a)(2)(ii) provides that service on a corporation or entity may be obtained by

confirmation of attempted delivery on the most recent address shown on the entity's most recent filing with the Commission.

2. The Secretary mailed the OIP to respondent Brandeis Holdings, Inc. (CIK No. 1374025) via Priority Mail Express, Label Tracking No. EM675735744US to the address shown on its most recent EDGAR filing of 600 Madison Ave., 14th Floor, New York, NY 10022. The USPS tracking system confirms that delivery was attempted on November 10, 2014. A true copy of the tracking confirmation is attached hereto as Exhibit 1.

3. The Secretary mailed the OIP to respondent Brighton Investment Holding Co. (CIK No. 1261656) via Priority Mail Express, Label Tracking No. EM675735758US, to the address shown on its most recent EDGAR filing of 275 Fifth Ave., New York, NY 10001. The USPS tracking system confirms that delivery was attempted on November 12, 2014. A true copy of the tracking confirmation is attached hereto as Exhibit 2.

4. The Secretary mailed the OIP to respondent Bristol Acquisitions Corp. (CIK No. 1502942) via Priority Mail Express, Label Tracking No. EM675735829US to the address shown on its most recent EDGAR filing of 2005 Merrick Road, Suite 326, Merrick, NY 11566. The USPS tracking system confirms that delivery was made on November 10, 2014. A true copy of the tracking confirmation is attached hereto as Exhibit 3.

5. The Secretary mailed the OIP to respondent The Continental Orinoco Co., Inc. (CIK No. 804889) via Priority Mail Express, Label Tracking No. EM675735713US to

the address shown on its most recent EDGAR filing of 360 West 22nd St., Suite 16B, New York, NY 10011. The USPS tracking system confirms that delivery was made on November 10, 2014. A true copy of the tracking confirmation is attached hereto as Exhibit 4.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 12, 2014.



Neil J. Welch, Jr.

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Features:
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DATE & TIME	STATUS OF ITEM	LOCATION
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November 10, 2014 , 7:55 am	Out for Delivery	NEW YORK, NY 10022
November 10, 2014 , 7:45 am	Sorting Complete	NEW YORK, NY 10022
November 10, 2014 , 7:38 am	Arrived at Post Office	NEW YORK, NY 10022
November 9, 2014 , 6:19 am	Departed USPS Facility	NEW YORK, NY 10199
November 9, 2014 , 12:39 am	Arrived at USPS Facility	NEW YORK, NY 10199
November 8, 2014 , 7:51 pm	Arrived at USPS Facility	LINTHICUM HEIGHTS, MD 21090

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Product & Tracking Information

Available Actions

Postal Product:

Features:
PO to Addressee

Proof of Delivery

Text Updates

Email Updates

DATE & TIME	STATUS OF ITEM	LOCATION
November 12, 2014 , 9:28 am	Undeliverable as Addressed	NEW YORK, NY 10016

Your item was undeliverable as addressed at 9:28 am on November 12, 2014 in NEW YORK, NY 10016. It is being returned if appropriate information is available.

November 10, 2014 , 8:14 am	Forwarded	NEW YORK, NY
November 10, 2014 , 7:01 am	Undeliverable as Addressed	NEW YORK, NY 10001
November 10, 2014 , 6:38 am	Arrived at Post Office	NEW YORK, NY 10001
November 9, 2014 , 6:19 am	Departed USPS Facility	NEW YORK, NY 10199
November 9, 2014 , 12:39 am	Arrived at USPS Facility	NEW YORK, NY 10199
November 8, 2014 , 8:00 pm	Arrived at USPS Facility	LINTHICUM HEIGHTS, MD 21090

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Tracking Number: EM675735829US

Signed for By: E ADAMS // MERRICK, NY 11566 // 11:21 am

Product & Tracking Information

Available Actions

Postal Product: Features:
PO to Addressee

Proof of Delivery

Text Updates

Email Updates

DATE & TIME	STATUS OF ITEM	LOCATION
November 10, 2014 , 11:21 am	Delivered	MERRICK, NY 11566

Your item was delivered at 11:21 am on November 10, 2014 in MERRICK, NY 11566. The item was signed for by E ADAMS.

November 10, 2014 , 10:44 am	Out for Delivery	MERRICK, NY 11566
November 10, 2014 , 10:34 am	Sorting Complete	MERRICK, NY 11566
November 10, 2014 , 10:08 am	Arrived at Post Office	MERRICK, NY 11566
November 9, 2014 , 11:43 am	Departed USPS Facility	GARDEN CITY, NY 11599
November 9, 2014 , 7:41 am	Arrived at USPS Facility	GARDEN CITY, NY 11599
November 8, 2014 , 7:51 pm	Arrived at USPS Facility	LINTHICUM HEIGHTS, MD 21090

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