

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-19868**

<p><b>In the Matter of</b></p> <p><b>EliteSoft Global Inc., <i>et al.</i>,</b></p> <p><b>Respondents.</b></p>
---------------------------------------------------------------------------------------------------------------

**DECLARATION OF GINA JOYCE**  
**CONCERNING SERVICE OF ELITESOFT GLOBAL, INC.**

GINA JOYCE, pursuant to 28 U.S.C. § 1746, declares:

1. I am a Senior Counsel with the Division of Enforcement (“Division”) of the Securities and Exchange Commission, and co-counsel for the Division in the captioned administrative proceeding.

2. On September 29, 2020, I filed the Declaration of Gina Joyce which stated that service of copy of the OIP<sup>1</sup> was attempted on EliteSoft Global, Inc. (“Elitesoft”), but that the package was returned. The package had been sent to Elitesoft at 18582 NW Holly Street, Unit 202, Beaverton, OR 97006 which is “the most recent address shown on the entity’s most recent filing with the Commission” as required by Rule 141(a)(2)(ii) of the Commission’s Rules of Practice. The most recent filing by Elitesoft is a Form 12b-25 dated and filed with the Commission on November 14, 2018. (A true copy of Elitesoft’s 12b-25 dated November 14, 2018 is attached hereto as Exh. 1).

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<sup>1</sup> Each service package included the OIP, a letter from the Commission’s Secretary, and a letter from the Division offering discovery pursuant to Rule of Practice 230.

3. On April 12, 2021, the Commission issued an Order stating that the package should be sent to an address other than “the most recent address shown on the entity’s most recent filing with the Commission” as required by Rule 141(a)(2)(ii) of the Commission’s Rules of Practice, referencing a street renaming project dated one day after the date of Elitesoft’s last filing.

4. On May 6, 2021, staff of the Office of the Secretary forwarded an email message to me that had been sent to the AP filings mailbox from the law firm of Paesano Akkashian Apkarian, PC that, *inter alia*, stated: “I am writing to inquire on an Administrative Proceeding File No. 3-19868, in the Matter of EliteSoft Global Inc. and Capital Access Point 1. Our office is former counsel of **EliteSoft Global Inc.**, who recently reached out to us for more information on this matter.” (Emphasis added). (A true copy of the email message is attached hereto as Exh. 2).

5. I contacted the law firm of Paesano Akkashian Apkarian, PC and emailed the OIP to the law firm on May 6, 2021. Thereafter, I informed staff of the Office of the Secretary that I had done this.

6. Additionally, after the Supplemental Order Regarding Service was issued on August 20, 2021, I emailed the OIP to the Commission’s Mailroom so that the OIP could be sent by U.S. Priority Mail Express to the Respondent. The Mailroom provided me with the U.S. Priority Mail Express tracking number for the copy of the OIP that was mailed to EliteSoft. (A true copy of the mailing label is attached hereto as Exh. 3). I input the tracking number into the U.S. Postal Service’s (“USPS”) package tracking system on its Internet website located at [www.usps.com](http://www.usps.com), and printed out the tracking confirmation in order to obtain confirmation of the delivery or attempted delivery of the

OIP on the Respondent. A true copy of the tracking confirmation for the Respondent for whom express mail service was attempted is attached as Exhibit 4, hereto.

7. The OIP was mailed to Respondent EliteSoft, CIK 1612254, via U.S. Priority Mail Express, Tracking No. EJ 435 624 183 US to 10664 NE Holly Street, Unit 202, Hillsboro, Oregon 97006, as directed by the Commission in its April 12, 2021 Order. The USPS tracking system confirms that the package was delivered on August 25, 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 26, 2021.

/s/ Gina Joyce  
Gina Joyce

**CERTIFICATE OF SERVICE**

I hereby certify that I caused true copies of the Division of Enforcement's Declaration of Gina Joyce Concerning Service of EliteSoft Global Inc., and Exhibits thereto, to be served on the following on August 26, 2021, in the manner indicated below:

By Email:

Office of the Secretary  
Via eFap

By UPS:

EliteSoft Global Inc.  
10664 NE Holly Street, Unit 202  
Hillsboro, Oregon 97006

/s/ Gina Joyce  
Gina Joyce

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549**

**Form 12b-25**

**NOTIFICATION OF LATE FILING**

(Check one):     Form 10-K     Form 20-F     Form 11-K     Form 10-Q  
                    Form 10-D     Form N-SAR     Form N-CSR

For Period Ended: September 30, 2018

Transition Report on Form 10-K  
 Transition Report on Form 20-F  
 Transition Report on Form 11-K  
 Transition Report on Form 10-Q  
 Transition Report on Form N-SAR

For the Transition Period Ended:

*Read Instruction Before Preparing Form. Please Print or Type.*

**Nothing in this form shall be construed to imply that the Commission has verified any information contained herein.**

If the notification relates to a portion of the filing checked above, identify the Item(s) to which the notification relates:

**PART I — REGISTRANT INFORMATION**

**ELITESOFT GLOBAL, INC.**  
(Full Name of Registrant)

**18582 NW Holly Street, Unit 202, Beaverton, Oregon 97006**  
(ADDRESS OF PRINCIPAL EXECUTIVE OFFICES)

**PART II — RULES 12b-25(b) AND (c)**

If the subject report could not be filed without unreasonable effort or expense and the registrant seeks relief pursuant to Rule 12b-25(b), the following should be completed. (Check box if appropriate.)

- (a) The reason described in reasonable detail in Part III of this form could not be eliminated without unreasonable effort or expense
- (b) The subject annual report, semi-annual report, transition report on Form 10-K, Form 20-F, Form 11-K, Form N-SAR or Form N-CSR, or portion thereof, will be filed on or before the fifteenth calendar day following the prescribed due date; or the subject quarterly report or transition report on Form 10-Q or subject distribution report on Form 10-D, or portion thereof, will be filed on or before the fifth calendar day following the prescribed due date; and
- (c) The accountant's statement or other exhibit required by Rule 12b-25(c) has been attached if applicable.

**PART III — NARRATIVE**

State below in reasonable detail why Forms 10-K, 20-F, 11-K, 10-Q, 10-D, N-SAR, N-CSR, or the transition report or portion thereof, could not be filed within the prescribed time period.

EliteSoft Global, Inc. (the "Company") is unable to file, without unreasonable effort or expense, its Quarterly Report on Form 10-Q for the period ended September 30, 2018 (the "Form 10-Q"). Additional time is needed for the Company's auditors and accounts to compile and analyze supporting documentation in order to finalize its unaudited financial statements included in the Form 10-Q. The Company has worked diligently to provide all information necessary to complete the financial statements and will continue to do so. The Company intends to file the Form 10-Q by or before November 19, 2018.

**PART IV — OTHER INFORMATION**

- (1) Name and telephone number of person to contact in regard to this notification

**Cornelius Ee**

**(503)**

**830-2918**

**OS Received 08/26/2021**

**Exhibit 1, p. 1**

- 
- | (Name) | (Area Code) | (Telephone Number) |
|--------|-------------|--------------------|
|--------|-------------|--------------------|
- (2) Have all other periodic reports required under Section 13 or 15(d) of the Securities Exchange Act of 1934 or Section 30 of the Investment Company Act of 1940 during the preceding 12 months or for such shorter period that the registrant was required to file such report(s) been filed? If answer is no, identify report(s).
- Yes  No
- The Company's Annual Report on Form 10-K for the December 31, 2018 Fiscal Year was filed on May 24, 2018. This was the only untimely report.
- (3) Is it anticipated that any significant change in results of operations from the corresponding period for the last fiscal year will be reflected by the earnings statements to be included in the subject report or portion thereof?  Yes  No

If so, attach an explanation of the anticipated change, both narratively and quantitatively, and, if appropriate, state the reasons why a reasonable estimate of the results cannot be made.

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#### SIGNATURES

EliteSoft Global, Inc., has caused this notification to be signed on its behalf by the undersigned hereunto duly authorized.

Date: November 14, 2018

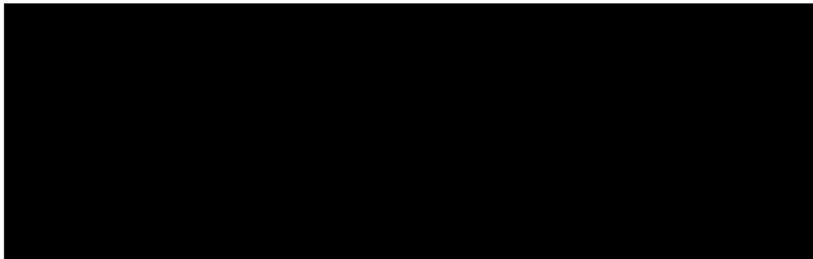
By: /s/ Cornelius Ee Soon Heng  
Cornelius Ee Soon Heng  
Chief Executive Officer

**To:** Joyce, Gina M.[JoyceG@SEC.GOV]; Bruckmann, Christopher[bruckmannc@SEC.GOV]  
**From:** Rodriguez, Elvia  
**Sent:** 2021-05-06T14:51:06-04:00  
**Importance:** Normal  
**Subject:** FW: File No. 3-19868, In the Matter of EliteSoft Global Inc. and Capital Access Point 1, Inc.  
**Received:** 2021-05-06T14:51:07-04:00

Good day,

Please see the message below which was submitted to the AP filings mailbox. OS does not have record of counsel representing either party.

Thanks



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**From:** Leanna Gonino <[lgonino@paalawfirm.com](mailto:lgonino@paalawfirm.com)>  
**Sent:** Thursday, May 06, 2021 1:49 PM  
**To:** apfilings <[apfilings@SEC.GOV](mailto:apfilings@SEC.GOV)>  
**Subject:** File No. 3-19868, In the Matter of EliteSoft Global Inc. and Capital Access Point 1, Inc.

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I am writing to inquire on an Administrative Proceeding File No. 3-19868, in the Matter of EliteSoft Global Inc. and Capital Access Point 1. Our office is former counsel of EliteSoft Global Inc., who recently reached out to us for more information on this matter; however, we are having trouble finding the pleadings for this case.

Thank you,



Leanna Gonino

Legal Assistant | **Paesano Akkashian Apkarian, PC**

A: 7457 Franklin Road, Suite 200, Bloomfield Hills, MI 48301

P: (248) 792-6886 F: (248) 792-6885

E: [lgonino@paalawfirm.com](mailto:lgonino@paalawfirm.com) W: [www.paalawfirm.com](http://www.paalawfirm.com)

Exhibit 2, p. 1

OS Received 08/26/2021

SEC-SOFTS-E-0000001

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PRESS FIRMLY TO SEAL

PRESS FIRMLY TO SEAL



U.S. POSTAGE PITNEY BOWES  
ZIP 02110 \$ 026.35<sup>0</sup>  
02 4W  
0000376210 AUG 24 2021



EJ 435 624 183 US



This envelope is made from post-consumer waste. Please recycle - again.

**PRIORITY MAIL EXPRESS**

**CUSTOMER USE ONLY**

FROM: (PLEASE PRINT) PHONE ( )

**US SECURITIES & EXCHANGE COMMISSION** *M.S.*  
100 F Street NE  
Washington DC 20549 - *5012*

**DELIVERY OPTIONS (Customer Use Only)**

SIGNATURE REQUIRED Note: The mailer must check the "Signature Required" box if the mailer: 1) Requires the addressee's signature; OR 2) Purchases additional insurance; OR 3) Purchases COD service; OR 4) Purchases Return Receipt service. If the box is not checked, the Postal Service will leave the item in the addressee's mail receptacle or other secure location without attempting to obtain the addressee's signature on delivery.

**Delivery Options**

No Saturday Delivery (delivered next business day)  
 Sunday/Holiday Delivery Required (additional fee, where available\*)  
 10:30 AM Delivery Required (additional fee, where available\*)  
 \*Refer to USPS.com® or local Post Office™ for availability.

TO: (PLEASE PRINT)

EliteSoft Global Inc.  
10664 NE Holly Street, Unit 202  
Hillsboro, Oregon 97006

ZIP + 4® (U.S. ADDRESSES ONLY)  
97006-

**PAYMENT BY ACCOUNT (if applicable)**

USPS® Corporate Acct. No. Federal Agency Acct. No. or Postal Service™ Acct. No.

**ORIGIN (POSTAL SERVICE USE ONLY)**

1-Day  2-Day  Military  DPO

PO ZIP Code	Scheduled Delivery Date (MM/DD/YY)	Postage	
		\$	
Date Accepted (MM/DD/YY)	Scheduled Delivery Time <input type="checkbox"/> 10:30 AM <input type="checkbox"/> 3:00 PM <input type="checkbox"/> 12 NOON	Insurance Fee	COD Fee
		\$	\$
Time Accepted <input type="checkbox"/> AM <input type="checkbox"/> PM	10:30 AM Delivery Fee	Return Receipt Fee	Live Animal Transportation Fee
	\$	\$	\$
Special Handling/Fragile	Sunday/Holiday Premium Fee	Total Postage & Fees	
\$	\$	\$	
Weight <input type="checkbox"/> Flat Rate	Acceptance Employee Initials		
lbs. ozs.		\$	

**DELIVERY (POSTAL SERVICE USE ONLY)**

Delivery Attempt (MM/DD/YY)	Time <input type="checkbox"/> AM <input type="checkbox"/> PM	Employee Signature
Delivery Attempt (MM/DD/YY)	Time <input type="checkbox"/> AM <input type="checkbox"/> PM	Employee Signature

To schedule free Package Pickup, scan the QR code.



USPS.COM/PICKUP



PS 10001000006

EP13F Oct 2018  
OD: 12 1/2 x 9 1/2

**PEEL FROM THIS CORNER**

\* Money Back Guarantee to U.S., select APO/FPO/DPO, and select International destinations. See DMM and IMM at pe.usps.com for complete details.  
† Money Back Guarantee for U.S. destinations only. \* For Domestic shipments, the maximum weight is 70 lbs. For International shipments, the maximum weight is 4 lbs.

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[FAQs >](#)

### Track Another Package +

**Tracking Number:** EJ435624183US

[Remove X](#)

Your item was delivered in or at the mailbox at 2:30 pm on August 25, 2021 in BEAVERTON, OR 97006. Waiver of signature was exercised at time of delivery.

## **Delivered, In/At Mailbox**

August 25, 2021 at 2:30 pm  
BEAVERTON, OR 97006

Feedback

**Get Updates** v

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**Text & Email Updates**



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**Proof of Delivery**



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**Tracking History**



August 25, 2021, 2:30 pm  
Delivered, In/At Mailbox  
BEAVERTON, OR 97006

Your item was delivered in or at the mailbox at 2:30 pm on August 25, 2021 in BEAVERTON, OR 97006. Waiver of signature was exercised at time of delivery.

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August 25, 2021, 9:04 am  
Arrived at Post Office  
PORTLAND, OR 97291

Exhibit 4, p. 1

**OS Received 08/26/2021**

August 25, 2021, 7:32 am  
Arrived at USPS Facility  
PORTLAND, OR 97215

August 24, 2021, 8:17 pm  
Arrived at USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

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**Product Information**



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**See Less** ^

## Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

**FAQs**

Feedback