

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

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-21064**

**In the Matter of**

**RULESS PIERRE A/K/A RULES PIERRE,**  
**Respondent.**

**DECLARATION OF TODD D. BRODY**  
**TO ASSIST SECRETARY WITH**  
**RECORD OF SERVICE**

I, TODD D. BRODY, pursuant to 28 U.S.C. § 1746, declare:

1. I am an attorney in the Division of Enforcement (“Division”) of the Securities and Exchange Commission (“Commission”), and counsel for the Division in the above-captioned administrative proceeding. I submit this Declaration to assist the Office of the Secretary (“Secretary”) in maintaining a record of service on the Respondent, Rules Pierre a/k/a Rules Pierre, in the above-captioned proceedings pursuant to Commission Rule of Practice 141(a)(3).

2. Commission Rule of Practice 141(a)(2)(i) permits service on individuals by delivering a copy of the order instituting administrative proceedings to the individual or an agent authorized by appointment or law to receive such notice by, among other things, sending a copy of the order addressed to the individual by U.S. Postal Service certified, registered, or Express Mail, and obtaining a confirmation of receipt; or giving confirmed telegraphic notice.

3. Therefore, the Division asked the Secretary to attempt service on the Respondent in these proceedings via U.S. Postal Service (“USPS”) certified mail and to send the Order Instituting Proceedings (“OIP”) to Respondent in the correctional facility where he resides. A true and correct copy of the service package, which states that the OIP was sent by certified mail

to mail to Mr. Rules Pierre (87408-054), c/o USP [REDACTED]

[REDACTED], is attached hereto as Exhibit 1.

4. At the Division's request, the Secretary provided the Division with the USPS receipts containing the tracking numbers for the service package that the Secretary mailed to the Respondent as well as the stamped return receipt for the service package. These documents demonstrate that the service package was sent to Mr. Pierre on September 13, 2022 and was received at the correctional facility where Mr. Pierre resides on September 20, 2022. The Secretary received the return receipt on October 4, 2022. A true and correct copy of these documents are attached hereto as Exhibit 2.

5. To date, Respondent has not filed an answer or other response to the OIP.

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

Executed on October 5, 2023  
New York, New York

/s/ Todd D. Brody  
Todd D. Brody