

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-21604

<p>In the Matter of</p> <p>Sungroup Inc.,</p> <p>Respondent.</p>

DECLARATION OF GINA JOYCE
TO ASSIST SECRETARY WITH RECORD OF SERVICE

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. I am submitting this Declaration to assist the Secretary in maintaining a record of service on the Respondent in the captioned proceedings pursuant to Rule 141(a)(3).

2. Among other means, Securities and Exchange Commission (“Commission”) Rule of Practice 141(a)(2)(ii) permits service on a corporation or entity by delivering a copy of an Order Instituting Administrative Proceedings (“OIP”) to an agent authorized by appointment or law to receive such service or, in the case of an issuer with a class of securities registered with the Commission, by sending the OIP via U.S. Postal Service certified, registered, or express mail and obtaining a confirmation of attempted delivery on the most recent address shown on the entity’s most recent filing with the Commission. Further, the OIP in this matter authorizes service of the OIP “by any means permitted by

the Commission's Rules of Practice." Therefore, the Division asked the Commission's Secretary to first attempt service on the Respondent via Priority Mail Express.

3. The Office of the Secretary provided me with the Certified Mail tracking number for the copy of the Order Instituting Proceedings ("OIP")¹ that was mailed by the Secretary to the Respondent in these proceedings. I input the tracking number into the package tracking system of the U.S. Postal Service ("USPS") on its Internet website located at 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 on which Certified Mail service was attempted is attached as Exhibit 1, hereto.

4. The Secretary mailed the OIP to Respondent Sungroup Inc., CIK 67903 ("Sungroup"), via Certified Mail, Tracking No. 7009 0080 0001 0193 9595, to the address shown on its most recent EDGAR filing at [REDACTED]

[REDACTED] This address is taken from Sungroup's last filing with the Commission, which was a Form 10KSB filed with the Commission on March 31, 1999.

5. The USPS tracking system confirms that the OIP was mailed on September 6, 2023 and returned on Monday, September 18, 2023, without any attempt to deliver the package. *See* Exhibit 1.

6. On Wednesday, September 20, 2023, I requested that the Mailroom send the OIP, along with a party letter and AP filing instructions to Sungroup via Priority Mail Express. A true copy of the Priority Mail Express label is attached hereto as Exhibit 2.

¹ Each service package includes the OIP, a letter from the Commission's Secretary, and AP filing instructions.

7. Exhibit 2 shows that the tracking number is EJ 127 657 425 US. The USPS tracking system confirms that the OIP was delivered on September 21, 2023, but on September 23, 2023, it was determined that the addressee was unknown. A true copy of the tracking confirmation for the Respondent on which Priority Mail Express service was attempted is attached as Exhibit 3, hereto.

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

Executed on September 26, 2023.

/s/ Gina Joyce
Gina Joyce