

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

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-22057**

<p><b>In the Matter of</b></p> <p><b>Commerce Group Corp. /WI/,</b></p> <p><b>Respondent.</b></p>
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**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 Certified Mail.

3. The Office of the Secretary (“OS”) provided me with the Certified Mail tracking numbers for the copy of the Order Instituting Proceedings (“OIP”)<sup>1</sup> that was mailed by the Secretary to the Respondent in these proceedings. I input the tracking numbers into the package tracking system of the U.S. Postal Service (“USPS”) on its Internet website located at [www.usps.com](http://www.usps.com), and printed out the tracking confirmations in order to obtain confirmation of the delivery or attempted delivery of the OIP on the Respondent. A true copy of the tracking confirmations for the Respondent on which Certified Mail service was attempted are attached as Exhibits 1 and 2, hereto.

4. Respondent Commerce Group Corp. /WI/, CIK 109757 (“CGCO”) has two addresses: one address located in Waukesha, Wisconsin that is taken from CGCO’s last filing with the Commission, which was a Form 8-K filed with the Commission on August 30, 2013; and a change of address to Wauwatosa, Wisconsin that was uploaded to the EDGAR system during 2015. The Division requested that the OS send the OIP to both addresses.

5. On September 5, 2024, the OS sent the OIP to CGCO’s Waukesha, Wisconsin address, via Certified Mail, Tracking No. 7017 2400 0000 0838 1629, and also sent the OIP to CGCO’s Wauwatosa, Wisconsin address, via Certified Mail, Tracking No. 7017 2400 0000 0838 1636.

6. The address taken from CGCO’s’s last filing with the Commission is N8 W22577 Johnson Drive, Waukesha, Wisconsin 53186. The USPS tracking system

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<sup>1</sup> Each service package included the OIP and a letter from the Commission’s Secretary.

confirms that delivery of the OIP package was attempted on September 9, 2024, but forwarding had expired. *See* Exhibit 1.

7. The change of address uploaded to EDGAR during 2015 is 2402 North 118th Street, Wauwatosa, WI 53226. Exhibit 2 confirms that as of September 18, 2024, USPS had not attempted to serve CGCO at the Wauwatosa address. Rather, USPS left a notice at the address and made the OIP available for pickup. *See* Exhibit 2.

8. Therefore, on Wednesday, September 18, 2024, I requested that the SEC's Mailroom send the OIP and party letter to CGCO via Priority Mail Express. A true copy of the Priority Mail Express tracking label, Tracking No. EJ127657632, is attached hereto as Exhibit 3.

9. A true copy of the tracking confirmation for the Respondent on which Priority Mail Express service was attempted is attached as Exhibit 4, hereto. Exhibit 4 confirms that the OIP package was delivered on September 19, 2024.

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

Executed on September 30, 2024.

/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 to Assist Secretary with Record of Service, and Exhibit thereto, to be served on the following on September 30, 2024, in the manner indicated below:

Via eFap:

Office of the Secretary

By UPS:

Commerce Group Corp. /WI/  
2402 North 118th Street  
Wauwatosa, WI 53226

N8 W22577 Johnson Drive  
Waukesha, Wisconsin 53186

/s/ Gina Joyce  
Gina Joyce