

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

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-22288**

<p><b>In the Matter of</b></p> <p><b>Confluence Acquisition Partners I, Inc.,</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 provided me with the Certified Mail tracking number 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 number 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 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. On or about November 7, 2024, the Secretary mailed the OIP to Respondent Confluence Acquisition Partners I, Inc., CIK 1323661 ("Confluence Acquisition"), via Certified Mail, Tracking No. 7013 2630 0002 2655 9889, to the address shown on its most recent EDGAR filing at 12444 Powerscourt Drive, Suite 225, St. Louis, MO 63131. This address is taken from Confluence Acquisition's last filing with the Commission, which was a Form 8-A12G filed with the Commission on January 18, 2006. Exhibit 1 shows that there was no attempt to deliver the OIP package to Respondent in St. Louis, MO.

5. On Wednesday, November 27, 2024, (the day before Thanksgiving), I requested that the SEC's Mailroom send the OIP and party letter to Confluence Acquisition via Priority Mail Express. A true copy of the Priority Mail Express tracking label, Tracking No. EJ 127 656 019 US, is attached hereto as Exhibit 2.

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

6. A true copy of the tracking confirmation for Confluence Acquisition on which Priority Mail Express service was attempted is attached as Exhibit 3, hereto. Exhibit 3 confirms that delivery of the package was attempted on Friday, November 29, 2024.

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

Executed on December 3, 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 December 3, 2024, in the manner indicated below:

Via eFap:

Office of the Secretary

By UPS:

Confluence Acquisition Partners I, Inc.  
12444 Powerscourt Drive  
Suite 225  
St. Louis, MO 63131

/s/ Gina Joyce  
Gina Joyce