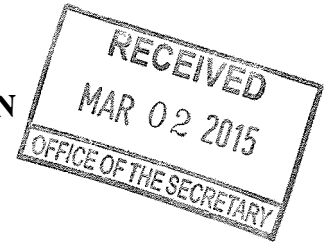


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING
File No. 3-16394

In the Matter of
Innovative Software Technologies, Inc., et al.,
Respondents.

DECLARATION OF DAVID S. FRYE
TO ASSIST SECRETARY WITH RECORD OF SERVICE

DAVID S. FRYE, 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 above-captioned administrative proceeding. I am submitting this Declaration to assist the Secretary in maintaining a record of service on the respondents in the above-captioned proceedings pursuant to Rule 141(a)(3).

2. The Office of the Secretary provided me with the U.S. Priority Mail Express tracking numbers for the copies of the Order Instituting Proceedings (“OIP”) that were mailed by the Secretary to the respondents these proceedings. I input each of the tracking numbers into the U.S. Postal Service’s (“USPS’s”) package tracking system on its Internet website located at www.usps.com, and printed out the tracking confirmations in order to obtain confirmation of the delivery or attempted delivery of the OIP on each respondent. A true copy of the tracking confirmations for all of the respondents for whom express mail service was attempted is attached as Exhibit 1, hereto. Rule

141(a)(2)(ii) provides that service on a corporation or entity may be obtained by confirmation of attempted delivery on the most recent address shown on the entity's most recent filing with the Commission.

3. The Secretary mailed the OIP to respondent Innovative Software Technologies, Inc. CIK 1084047 ("INIV") via Priority Mail Express, Tracking No. [REDACTED] to the address shown on its most recent EDGAR filing at [REDACTED]. This address is taken from INIV's last filing with the Commission, which was a Form 8-K filed with the Commission on October 15, 2014. The USPS tracking system confirms that the package was delivered on February 24, 2015. *See* Exhibit 1 at 1.

4. The Secretary mailed the OIP to respondent National Health Partners, Inc. CIK 1306109 ("NHPR") via Priority Mail Express, Tracking No. [REDACTED] to the address shown on its most recent EDGAR filing at [REDACTED]. This address is taken from NHPR's last filing with the Commission, which was a Form S-8 filed with the Commission on February 19, 2013. The USPS tracking system confirms that the package was delivered on February 24, 2015. *See* Exhibit 1 at 2.

5. The Secretary mailed the OIP to respondent The Laguna Group, Inc. (a/k/a Eco Energy Pumps, Inc.) CIK 1458725 ("EPU") via Priority Mail Express, Tracking No. [REDACTED] to the address shown on its most recent EDGAR filing at [REDACTED]. This address is taken from EPU's last filing with the Commission, which was a Form 8-K filed with the Commission on July 28, 2014. The USPS tracking system confirms that delivery was attempted on February 24, 2015

but the package was undeliverable as addressed and the addressee was unknown. *See* Exhibit 1 at 3.

6. The Secretary mailed the OIP to respondent TYIN Group Holdings Limited CIK 1512693 (“TYIN”) via Priority Mail Express, Tracking No. [REDACTED] to the address shown on its most recent EDGAR filing at G/F, [REDACTED]. This address is taken from TYIN’s last filing with the Commission, which was a Form 8-K filed with the Commission on November 3, 2014. The USPS tracking system confirms that delivery was attempted and notice left on March 2, 2015. *See* Exhibit 1 at 4.

7. In order to determine whether mail service was an acceptable means of service in Hong Kong, which is now a special administrative region of the People’s Republic of China, I checked the website of the Hague Conference on Private International Law, and determined that both Hong Kong and the United States are signatories to the Hague Convention. The People’s Republic of China provides a different set of Hague Convention declarations pertaining to Hong Kong than it does for mainland China. Specifically, the People’s Republic of China does not provide an Article 10(a) declaration pertaining to Hong Kong, thus Hong Kong does not have a 10(a) objection to postal channels. Because Hong Kong does not object to service by postal channels, service of process by mail is authorized in this case. *See Ackermann v. Levine*, 788 F.2d 830, 839 (2d Cir. 1986). *See also*, http://www.hcch.net/index_en.php?act=authorities.details&aid=393.

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

Executed on March 2, 2015.



David S. Frye

3-16394

Innovative Software

English Customer Service USPS Mobile

Register / Sign In



USPS Tracking™



Customer Service >
Have questions? We're here to help.

Tracking Number: XXXXXXXXXX

Updated Delivery Day: **Wednesday, February 25, 2015**
Signed for By: WAIVED // TAMPA, FL 33607 // 11:46 am

Product & Tracking Information

Available Actions

Postal Product:

Features:
PO to Addressee

DATE & TIME	STATUS OF ITEM	LOCATION
February 24, 2015, 11:46 am	Delivered, Left with Individual	TAMPA, FL 33607
Your item was delivered to an individual at the address at 11:46 am on February 24, 2015 in TAMPA, FL 33607.		
February 24, 2015, 9:59 am	Arrived at Post Office	TAMPA, FL 33607
February 24, 2015, 7:14 am	Departed USPS Facility	TAMPA, FL 33630
February 24, 2015, 7:14 am	Arrived at USPS Facility	TAMPA, FL 33630
February 23, 2015, 11:34 pm	Departed USPS Facility	LINTHICUM HEIGHTS, MD 21090
February 23, 2015, 8:29 pm	Arrived at USPS Facility	LINTHICUM HEIGHTS, MD 21090

Proof of Delivery

Text Updates

Email Updates

Track Another Package

Tracking (or receipt) number

Track It

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English

Customer Service

USPS Mobile

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USPS Tracking™



Customer Service >
Have questions? We're here to help.

Tracking Number: [REDACTED]

Updated Delivery Day: **Tuesday, February 24, 2015**
Signed for By: WAIVED // HORSHAM, PA 19044 // 10:47 am

Product & Tracking Information

Available Actions

Postal Product:

Features:
PO to Addressee

Proof of Delivery

DATE & TIME	STATUS OF ITEM	LOCATION
February 24, 2015 , 10:47 am	Delivered, In/At Mailbox	HORSHAM, PA 19044

- Text Updates
- Email Updates

Your item was delivered in or at the mailbox at 10:47 am on February 24, 2015 in HORSHAM, PA 19044.

February 24, 2015 , 8:37 am	Out for Delivery	AMBLER, PA 19002
February 24, 2015 , 8:27 am	Sorting Complete	AMBLER, PA 19002
February 24, 2015 , 6:04 am	Arrived at Post Office	AMBLER, PA 19002
February 24, 2015 , 2:50 am	Arrived at USPS Facility	PHILADELPHIA, PA 19176
February 23, 2015 , 11:34 pm	Departed USPS Facility	LINTHICUM HEIGHTS, MD 21090
February 23, 2015 , 8:29 pm	Arrived at USPS Facility	LINTHICUM HEIGHTS, MD 21090

Track Another Package

Tracking (or receipt) number

Track It

English

Customer Service

USPS Mobile

Register / Sign In



USPS Tracking™



Customer Service ›
Have questions? We're here to help.

Tracking Number: XXXXXXXXXX

Updated Delivery Day: **Friday, February 27, 2015**
Signed for By: D SEIFELT // WASHINGTON, DC 20549 // 11:21 am

Product & Tracking Information

Postal Product:

Features:
PO to Addressee

DATE & TIME	STATUS OF ITEM	LOCATION
February 26, 2015, 11:21 am	Delivered	WASHINGTON, DC 20549
Your item was delivered at 11:21 am on February 26, 2015 in WASHINGTON, DC 20549. The item was signed for by D SEIFELT.		
February 26, 2015, 10:42 am	Arrived at Post Office	WASHINGTON, DC 20018
February 26, 2015, 10:05 am	Departed USPS Facility	WASHINGTON, DC 20074
February 26, 2015, 9:24 am	Arrived at USPS Facility	WASHINGTON, DC 20074
February 24, 2015, 8:06 pm	Available for Pickup	WASHINGTON, DC 20549
February 24, 2015, 4:35 pm	Addressee Unknown	CARSON CITY, NV 89701
February 24, 2015, 11:49 am	Undeliverable as Addressed	CARSON CITY, NV 89703
February 24, 2015, 11:29 am	Arrived at Post Office	CARSON CITY, NV 89701
February 24, 2015, 10:08 am	Arrived at USPS Facility	RENO, NV 89510
February 23, 2015, 11:34 pm	Departed USPS Facility	LINTHICUM HEIGHTS, MD 21090
February 23, 2015, 8:34 pm	Arrived at USPS Facility	LINTHICUM HEIGHTS, MD 21090

Available Actions

Proof of Delivery

Text Updates

Email Updates

Track Another Package

Tracking (or receipt) number

Track It

English

Customer Service

USPS Mobile

Register / Sign In



USPS Tracking™



Customer Service ›
Have questions? We're here to help.

Tracking Number: XXXXXXXXXX

Product & Tracking Information

Postal Product:

Features:
PO to Addressee

DATE & TIME	STATUS OF ITEM	LOCATION
March 2, 2015, 3:22 pm	Addressee not available - Addressee advised to pick up the item	HONG KONG
Your item could not be delivered on March 2, 2015 at 3:22 pm in HONG KONG due to the addressee not available at time of delivery. The addressee has been advised to pick up the item.		
March 2, 2015, 6:49 am	Arrival at Post Office	HONG KONG
March 1, 2015, 1:25 am	Processed through Sort Facility	HONG KONG AIR MAIL CENTRE, HONG KONG
February 28, 2015, 9:34 pm	Processed Through Sort Facility	HONG KONG
February 28, 2015, 9:20 pm	Departed	HONG KONG
February 27, 2015, 4:08 pm	Departed	Newark, UNITED STATES
February 27, 2015, 9:35 am	Arrived	Newark, UNITED STATES
February 26, 2015, 9:56 am	Processed Through Sort Facility	ISC NEW YORK NY(USPS)
February 26, 2015, 9:55 am	Arrived at Sort Facility	ISC NEW YORK NY(USPS)
February 26, 2015, 6:22 am	Arrived at USPS Facility	JAMAICA, NY 11430
February 25, 2015, 10:41 pm	Departed USPS Facility	LINTHICUM HEIGHTS, MD 21090
February 25, 2015, 7:55 pm	Arrived at USPS Facility	LINTHICUM HEIGHTS, MD 21090

Available Actions

Text Updates

Email Updates

Track Another Package

Tracking (or receipt) number

Track It