HARD COPY

Blink Technologies

April 12, 2017

The Honorable Brenda P. Murray Chief Administrative Law Judge Securities and Exchange Commission 100 F Street, NE Washington, DC 20549-2557 RECEIVED

APR 13 2017

OFFICE OF THE SECRETARY

RE: Blink Technologies Statement of Position regarding Administrative Proceeding File No. 3-17865.

In the Matter of:

CIRTRAN CORP.
CONOLOG CORP.
BLINK TECHNOLOGIES, INC. (F/K/A EPUNK, INC.), and WORLD SURVEILLANCE GROUP, INC.

Your Honor,

Please accept this response as our official statement of position concerning the above mentioned matter. Thank you.

Historic Business

Blink Technologies, Inc. developed and delivered a next generation technology platform and integrated intelligent hardware solution for niche markets that securely and efficiently provides streaming data, video, voice, and content delivery via mobile devices.

Our strategy was, and still is, to offer value that public investors find attractive and to utilize those funds to complement an organic revenue stream generated by our commercial product and service offerings to establish and nurture our company. It is difficult for small, innovative companies in our industry to attract adequate funding when you are not a derivative of a household name entity like Google, Amazon, Microsoft and the likes, and especially when your team is based in Michigan.

Since early 2015, we bootstrapped our efforts and have continued to engineer, refine, and deliver a compact technology framework that enables devices such as computers, tablets and smartphones to collect data and communicate securely and privately with one another over direct, peer-to-peer connections. This software suite features a web browser-based user interface that runs on Windows, MacOS, Linux, Android and iOS devices. We believe that our solution will let us dominate in select niche markets.

Blink's software platform provides a set of the most popular modern-era cloud services such as texting, email, file sharing, and VOIP, but does not require a cloud service provider like Google, DropBox, or Amazon, in the middle. Eliminating the need for a server in the middle allows our users and their devices to collaborate privately in environments where access to the greater Internet is not available or is intentionally disabled for maximum security. Our platform is ideal for Software as a Service (SaaS) applications that are employed to sample, collect, aggregate, communicate and report on critical data, especially in and from remote locations utilizing our mobile application on both iOS and Android devices.

SEC Compliance

On February 10, 2014, the Issuer entered into a Share Exchange Agreement with Blink Technologies, Inc., a Nevada corporation whereby the Issuer agreed to issue shares of the Issuer's common stock in exchange for all of the issued and outstanding common share capital of Blink Technologies. On February 27, 2014, the prior management was replaced with me, Steve Dowdell (replaced by Thomas Hanna) and Robert Gilbert. Our immediate task was to bring our entity into compliance with SEC requirements and provide full and fair disclosure. Upon review, we determined that our financial statements were not sufficiently reliable, filed a Form 8-K to indicate that fact, and then promptly restated the

financial statements going back to 2012 in order to be in compliance. By the year-end of 2014, we were able to bring our financial statements and disclosures current up to the June 30, 2014 quarterly. Our next filing was due December 29, 2014 (as our year end is September 30) but due to our efforts in bring the prior filings into compliance, we ran out of adequate funding to support the responsibilities of a public company. With our focus, we did not file the requisite individual Form 3 filings (which we realize is a personal responsibility) as all our efforts and funds were focused on the company's regulatory disclosure filings. Please note that we filed a Form 8-K disclosing the merger with Blink Technologies, with such disclosure including all "Super 8-K disclosures" including management and beneficial ownership (the information that would have been filed under Section 16) as well as audited financial and pro forma financials for Blink technologies. In short, significant expenditures were made to both bring the Company into regulatory compliance (current and past) and complete the regulatory requirement mandated from a merger.

On December 29, 2014, we did file for an extension for the annual report for fiscal 2014. We made the decision not to make any further filings until we had the financing needed to engage the appropriate professionals and provide complete and accurate disclosures. Filing for 12b-25 extensions for each subsequent quarter knowing we were not able to prepare, at that time, to make the filings timely would be, in our opinion misleading.

Current stratagem

Upon taking control of the company from the previous management team my primary focus was to complete the merger and get the combined company current in its reporting, which meant going through a complete 2-year audit. The public company had previously been in a totally different business and industry and the difficulties they experienced were theirs and totally unrelated to our operation and direction. In parallel, we were continuing to develop our product offering and trying to procure additional funding.

Following our inability to properly file by January 13, 2015 (the extension deadline) due to limited operating capital, we determined not to file a deficient report and delay filing until we acquired sufficient funding for both the business and the filings. I believe it is important to note that during all this time, we have

not engaged in any promotional or marketing activities, nor have we engaged in investor relations. We shut down our website and focused on product development. With the exception of shares issued to two board members, and several people in the form of settlements for conversions of other securities, the company has not issued any shares of stock since mid-2014, prior to our brief period of compliance. I have attached a current stock transfer journal dated back to the merger.

In February of this year we were able to start the process of getting our company back into compliance. We have employed a new registered agent and completed all steps required to be in good standing with the state of Nevada. We updated our information with OTC Markets online, are working with our auditor, which was acquired since our last reporting, and have engaged a new accountant to get our books validated so we can become compliant as soon as is reasonably practicable.

Response to Securities and Exchange Commission Statement and Request for Ruling in Favor of the Issuer

I find it difficult to understand how we are causing harm to our shareholders by taking this course of action. The shares are currently valued at ~ \$.006 and there is no news nor market for the securities. To my knowledge, apart from trading on a two day period in January this year (of which we have no knowledge what prompted a short limited amount of activity), stock purchase and sales have been effectively dormant. This is not surprising as we have taken no action related to the trading of the stock. We believe if we execute on our plan our shareholders will be pleasantly surprised to know that we didn't just fade away and that there is value that will grow over time. We are acting in the best interests of the shareholders.

We are busy raising capital and have a small, but growing stable of clients using our technology solution. We are in the process of designing our online presence with a new website to help complement and support our current grassroots marketing efforts. We believe being an exciting technology provider with the ability to raise necessary and additional funding to fuel the infrastructure and marketing efforts required to sustain ourselves as a public entity and overachieve in the market place is the model we'd like to continue to pursue and employ

going forward. We filed the Form 15 to clearly indicate our intent to cease reporting requirements under the Securities Exchange Act of 1934, although once we are financially sound, it is our intention to file a registration statement on Form 10 or Form S-1 to provide two year of audited financials (filings that are reviewed by the Securities and Exchange Commission) as well as recommence our requisite quarterly, annual, and current reports. It seems draconian to deregister an issuer that has virtually no stock activity, has no promotional or IR materials disseminated, voluntarily files to exit the filing requirements (but understands that the requirement for reporting prior to the Form 15 filing does not cease but intends to provide current information when reasonably able), and will have a formal ceasing of reporting requirements either upon acceleration of the Form 15 or on June 9, 2017 at the latest. The position of the Securities and Exchange Commission, to deregister an Issuer regardless of the underlying facts, to accept voluntary discussions with the Securities and Exchange Commission initiated by the Issuer without counsel in which the Securities and Exchange Commission provided the indicia of being cooperative, the denying accelerating of the Form 15 without the Issuer having the benefit to present background and intended actions, seems to present a rigid and inflexible position that does not work to the benefit of the shareholders. To this end, we would agree to an acceleration of the acceptance date of the Form 15 that we filed or a dismissal and allow the Form 15 action to take place as intended by the filing.

Thank you for your consideration in this matter. I look forward to your decision.

Respectfully,

Dean Miller

Blink Technologies

Copy to Neil J. Welch and Kevin P. O'Rourke, SEC Counsel for Division of Enforcement.

Empire Stock Transfer EPUNK - ePunk, Inc.

Transaction Journal

All Transactions For All Stock Classes from 07/01/14 through 04/10/17

4/10/17 2:56 pm Page 1 of 3

	1		DISPOSED					ACQUIRED				
Transact Date	Trans#	Holder ID	Name		Certificate No.	Shares	DispDt	Holder ID Name	Certificate No.	Number of How Shares Aqr	Active 04/10/2017 Di	
NEW ISSUE	ES											
08/21/14	971 h	lewissue	@ \$0.47/per share**					228 Michael James Economy	CS3 190	0 128,000 * New	128,000	
08/29/14	973 1	lewissue	@ \$0.10/per share**					119 Amalfi Coast Capital, Inc.	CS3 190	1 1,651,155 * New	1,651,155	
08/29/14	973 1	lewissue	@ \$0.20/per share**					119 Amalfi Coast Capital, Inc.	CS3 190	2 350,000 * New	350,000	
10/15/14	977 N	lewissue	@ \$0.47/per share**					162 Robert Gilbert	CS3 191	7 420,000 * New	420,000	
10/15/14	977 1	lewissue						235 Thomas Hanna	CS3 191	8 500,000 * New	500,000	
10/15/14	977 1	lewissue	•					236 International Technologies Mar	CS3 191	9 375,000 * New	375,000	
10/15/14	977 1	lewissue						237 Rhonda Rae Callow	CS3 192	0 187,500 * New	187,500	
10/15/14	977 1	iewissue	•					238 Tricia Dawn Parsonson	CS3 192	1 187,500 * New	187,500	
	5,,, ,	,	& 40.477pcr chare					Total N	ew Issues:	3,799,155	3,799,155	
TRANSFER	S											
08/04/14	968	119	Amalfi Coast Capital, inc.		CS3 1741	1,000,000	08/04/14	227 Makaiwi & Associates, Inc.	CS3 189	7 1,000,000 Tra	т	
Rcd From:	AMALFI C	OAST	08/04/14 9:39 AM	Routine	Total:	1,000,000 C	ontrol ID	:STTK000000049966 Mailed:08/04/14 1	4:43 Total:	1,000,000	0	
08/14/14	969	136	inawa Corp.		CS2 (CS2-1687)	100,000	08/14/14	95 Alpco	CS3 189	8 100,000 Tra	т	
Rcd From:	ALPINE S	ECURITI	ES 08/08/14 9:45 AM	Non- Routine	Total:	100,000 C	ontrol ID	:STTK000000050074 Mailed:08/14/14 1	3:38 Total:	100,000	0	
08/18/14	970	226	Richard Van Johnson Whi	te, Sr.	CS3 1895	1,200,000	08/18/14	221 NC Investment Holdings Inc.	CS3 189	9 1,200,000 * Tra	Т	
Rcd From:	DEAN MI	LER	08/05/14 9:56 AM	Non- Routine	Total:	1,200,000 C	ontrol ID	:STTK000000049981 Mailed:08/18/14 1	3:11 Total:	1,200,000	0	
08/25/14	972	95	Alpco		CS3 1898	100,000	08/25/14	1 147 FAST - Cede & Co.	вкз	100,000 Tra	100,000	
Red From:	DTC		08/25/14 9:47 AM	Routine	Total:	100,000 C	ontrol ID	:STTK000000050386 Mailed:08/25/141	3:38 Total:	100,000	100,000	
09/25/14	974	218	Lester and Ross, Ltd.		CS3 1885	5,858,138	09/25/14	229 Francis John Donahue	CS3 190	3 96,000 * Tra	96,000	
09/25/14	974							230 Donna L. Donahue	CS3 190	4 96,000 * Tra	96,000	
09/25/14	974							231 Keith Ablow	CS3 190	5 8,000 * Tra	8,000	
09/25/14	974							232 Anthony Antonelli	CS3 190		192,000	
09/25/14	974							193 William Rawald	CS3 190	7 32,000 * Tra	32,000	
09/25/14	974							198 Andrew Secher	CS3 190	8 80,000 * Tra	80,000	
09/25/14	974							187 Peter Doyle	CS3 190	9 160,000 * Tra	160,000	
09/25/14	974							233 John N. Donahue	CS3 191	1 448,000 * Tra	448,000	
09/25/14	974							233 John N. Donahue	CS3 191	2 288,000 * Tra	288,000	

Empire Stock Transfer EPUNK - ePunk, Inc.

Transaction Journal

All Transactions For All Stock Classes from 07/01/14 through 04/10/17

4/10/17 2:56 pm Page 2 of 3

	1	DISPOSED					ACQUIRED				
Transact Date	Trans#	Holder ID Nar	me	Certificate No.	Shares	DispDt	Holder ID Name	Certificate No.	Number of Hov Shares Agr	/ Active 04/10/2017 Dis	
TRANSFER	RS										
09/25/14 09/25/14 09/25/14 09/25/14	974 974 974 974						219 Zoifo Cooper Holdings, LLC 218 Lester and Ross, Ltd. 234 Robert A. Ciampitti Jr. 174 Charles Palmisano	CS3 1914 CS3 1915 CS3 1913 CS3 1910	960,000 * Tra 1,194,138 * Tra 1,920,000 * Tra 384,000 * Tra	960,000 1,194,138 T T	
Rcd From:		LER	09/23/14 9:53 AM Non- Routine	Total:	5,858,138 C	ontrol ID	:STTK000000051004 Mailed: 09/25/14		5,858,138	3,554,138	
10/01/14 Rcd From:	975 WILSON-I	227 Mai DAVIS & CO.	kaiwi & Associates, Inc. . 10/01/14 10:48 AM Routine	CS3 1897 Total:	1,000,000 1,000,000 C		86 WILCO :STTK000000051180 Mailed:10/01/14	CS3 1916 13:01 Total:	1,000,000 Tra 1,000,000	T 0	
10/08/14 Rcd From:	976 DTC	86 WIL	LCO 10/08/14 10:00 AM Routine	CS3 1916 Total:	1,000,000 1,000,000 C		147 FAST - Cede & Co. :STTK000000051299 Mailed:10/08/14	BK3 14:39 Total:	1,000,000 Tra 1,000,000	1,000,000 1,000,000	
10/17/14 Rcd From:	978 DEAN MIL		hard Heartquist 10/17/14 10:10 AM Routine	CS3 1847 Total:	•	10/17/14 ontrol ID	180 Richard Heartquist :STTK000000051468 Mailed:10/17/14	CS3 1922 11:17 Total:	32,000 * Tra 32,000	32,000 32,000	
12/05/14 12/05/14 Rcd From:	979 979 NC INVES HOLDING	221 NC STMENT	Investment Holdings Inc. Investment Holdings Inc. 12/02/14 10:15 AM Routine	CS3 1896 CS3 1899 Total:	2,000,000 1 1,200,000 1 3,200,000 C	12/05/14	· · · · · · · · · · · · · · · · · · ·	BK3 17:54 Total:	3,200,000 Tra	О	
12/08/14 Rcd From:	980 FRED AN		d Angelopolous OS 12/04/14 2:44 PM Non- Routine	CS3 1894 Total:	2,200,000 °C		220 Fred Angelopolous :STTK000000052247 Mailed:12/08/14	BK3 15:06 Total:	2,200,000 Tra 2,200,000	2,200,000 2,200,000	
12/09/14 Rcd From:	981 MARTY M		rtin McComas 12/04/14 2:44 PM Non- Routine	CS3 1826 Total:	213,333 °C		159 Martin McComas :STTK000000052244 Mailed:12/09/14	CS3 1923 14:10 Total:	213,333 Tra 213,333	T 0	
12/12/14	982	169 Doi	nna Ciampitti	CS3 1836 Lost/Stolen	53,333 1	12/12/14	169 Donna Clampitti	CS3 1924 Replaces CS3	53,333 * Tra 3 1836	53,333	
Rcd From:	DEAN MII	LLER	12/10/14 1:47 PM Routine	Total:	53,333 C	ontrol ID	:STTK000000052335 Mailed:12/12/14	15:34 Total:	53,333	53,333	
12/19/14 Rcd From:	983 RICHARD		Investment Holdings Inc. 12/19/14 1:40 PM Routine	BK3 Total:	2,100,000 2,100,000 C		147 FAST - Cede & Co. :STTK000000052503 Mailed:12/19/14	BK3 13:42 Total:	2,100,000 Tra 2,100,000	2,100,000 2,100,000	
12/29/14 Rcd From:	984 DTC	159 Ma	rtin McComas 12/29/14 5:54 PM Routine	CS3 1923 Total:	213,333 213,333 C		147 FAST - Cede & Co. :STTK000000052603 Mailed:12/29/14	BK3 15:22 Total:	213,333 Tra 213,333	213,333 213,333	
12/30/14	985	167 Tro	y Greer	CS3 1834	76,800	12/30/14	167 Troy Greer	CS3 1925	76,800 Tra	76,800	

Empire Stock Transfer EPUNK - ePunk, Inc.

Transaction Journal

All Transactions For All Stock Classes from 07/01/14 through 04/10/17

4/10/17 2:56 pm Page 3 of 3

Transact Date	Trans#	DISPOSED			1 4# 88# 02#40 # 40 m 20 # 60 # 60 # 6 0 # 60 # 60 # 60 # 60 #	***************************************	ACQUIRED	******************************	
		Holde	r O Name	Certificate No.	Shares DispDt	Holder ID Name	Certificate No.	Number of How Shares Aqr	Active 04/10/2017 Dis
TRANSFER	s								
Rcd From:	TROY GR	EER	12/24/14 11:46 AM Non- Routin	Total:	76,800 Control IE	:STTK000000052584 Ma	iled:12/30/14 14:35 Total:	76,800	76,800
01/05/15	986	234	Robert A. Ciampitti Jr.	CS3 1913	1,920,000 * 01/05/1	5 147 FAST - Cede & C	o. BK3	1,920,000 Tra	1,920,000
Rcd From:	ROBERT	CIAMIT	TI 12/29/14 5:54 PM Non- Routin	Total:	1,920,000 Control II	:STTK000000052592 Ma	iled:01/05/15 15:18 Total:	1,920,000	1,920,000
01/08/15	987	161	Keith Riley	CS3 1828	234,667 * 01/08/15	5 161 Keith Riley	CS3 1926	234,667 Tra	234,667
Rcd From:	KEITH RE	ILLY	12/30/14 10:12 AM Non- Routin	Total:	234,667 Control ID	:STTK000000052645 Ma	iled:01/08/15 13:53 Total:	234,667	234,667
01/20/15	988	221	NC Investment Holdings Inc.	вкз	600,000 01/20/1	239 Anthony Jordan R	teilly BK3	600,000 Tra	600,000
Rcd From:	RICHARE	V. WHI	TE 01/15/15 10:27 AM Routin	e Total:	600,000 Control IE	:STTK000000052901 Ma	iled: 01/20/15 15:20 Total:	600,000	600,000
02/11/15	989	174	Charles Palmisano	CS3 1841	320,000 * 02/11/1	5 174 Charles Palmisan	o CS3 1927	704,000 Tra	704,000
02/11/15	989		Charles Palmisano	CS3 1910	384,000 * 02/11/15	5			
Rcd From:	CHARLES PALMISA		12/30/14 10:12 AM Non- Routin	Total:	704,000 Control II	:STTK000000052649 Ma	iled:02/11/15 14:41 Total:	704,000	704,000
06/16/15	990	114	Jesse Richard Gonzales	CS3 1747	75,000 * 06/16/19	5 241 Kurtis William Me	nsing CS3 1928	75,000 * Tra	75,000
Rcd From:	CARRIE	SONZAL	ES 06/16/15 9:22 AM Routin	e Total:	75,000 Control ID	:STTK000000055546 Ma	iled:06/16/15 11:57 Total:	75,000	75,000
			Total Transferred From (exclud	ing Voids):	21,880,604	Total Trans	ferred To (excluding Voids):	21,880,604	12,863,271
					Total shares Issued as	of Beginning of Period:	43,950,602		
					New Share	s Issued during Period:	3,799,155		
						s Retired during Period:	0		
						s Voided during Period:	0		
					Shares C	onverted during Period:	. 0		

Total shares Issued as of End of Period:

47,749,757

(* = Restricted)

^{**} price shown on this report represents the original price entered on this transaction and does not include any adjustments made to cost basis