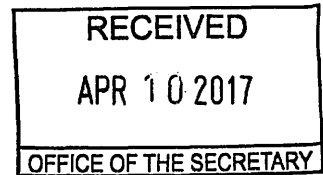


**UNITED STATES OF AMERICA**  
Before the  
**SECURITIES AND EXCHANGE COMMISSION**



**ADMINISTRATIVE PROCEEDING**  
**File No. 3-17865**

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**In the Matter of**

**CirTran Corp., et al.,**

**Respondents.**

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**DIVISION OF ENFORCEMENT'S STATEMENT  
OF POSITION AS TO RESPONDENT BLINK TECHNOLOGIES, INC.**

The Division of Enforcement ("Division"), by counsel, pursuant to the Court's Order of April 4, 2017, hereby states its position as to the Respondent Blink Technologies, Inc.

It is the Division's position that investors are now being harmed, and will continue to be harmed, as long as the stock of Respondent Blink Technologies, Inc. (f/k/a Epunk, Inc.) ("Blink Technologies") continues to trade on the over-the-counter markets with no current periodic reports available to investors. The stock will continue to trade even after the Form 15 filed by Blink Technologies becomes effective on June 7, 2017. Securities traded on the OTC Links (formerly known as the "Pink Sheets") do not require Section 12 registration. Thus, even if the Division of Corporation Finance acted to declare the Form 15 immediately effective, the stock would still trade, and investors would be harmed.<sup>1</sup> Section 12(j) of the Securities Exchange Act of 1934 prohibits

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<sup>1</sup> The Division of Corporation Finance has advised the Division that it will not accelerate the effectiveness of Respondent's Form 15.

members of a national securities exchange, brokers, or dealers from effecting any transaction in any security where its registration has been revoked. Thus absent a Section 12(j) revocation, Blink Technologies' stock would continue to trade.

If the Court does not wish to grant the Division's Motion for Ruling on the Pleadings, then the Division proposes that it file a motion to dismiss Blink Technologies from this case when its Form 15 becomes effective, either with this Court, if appropriate, or with the Commission.

Dated: April 10, 2017

Respectfully submitted,



Kevin P. O'Rourke (202) 551-4442

Neil J. Welch, Jr. (202) 551-4731

Securities and Exchange Commission

100 F Street, N.E.

Washington, D.C. 20549-6010

COUNSEL FOR  
DIVISION OF ENFORCEMENT

CERTIFICATE OF SERVICE

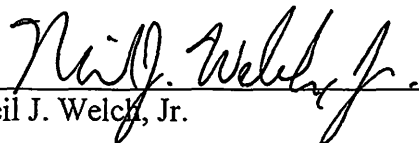
I hereby certify that true copies of the Division of Enforcement's Statement of Position as to Respondent Blink Technologies, Inc. were served on the following on this 10th day of April, 2017, in the manner indicated below:

By Hand:

The Honorable Brenda P. Murray  
Chief Administrative Law Judge  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549-2557

By Priority Mail Express and Email:

Dean Miller, CEO  
Blink Technologies, Inc.  
P.O. Box 1042  
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Neil J. Welch, Jr.