

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-17977

In the Matter of

Ciralight Global, Inc., *et al.*,

Respondents.

DIVISION OF ENFORCEMENT'S BRIEF
IN RESPONSE TO QUESTIONS IN OCTOBER 11, 2018 ORDER

The Division of Enforcement ("Division"), by counsel, hereby files this Brief in response to the questions raised in the Court's October 11, 2018 order.

In the Division's Motion to the Commission to Dismiss Proceedings and Brief in Support, filed concurrently herewith, the Division answers the Court's Questions (1) and (3). That is, as to Question (1), the current statuses of the registrations of Respondents' securities are that they are revoked. As to Question (3), the status of the Form 15-12G filed by IPOWorld, the Form 15-12G was effective in terminating the registration of the securities.

As for Question (2), the effect of revocations on the service of post-remand orders and filings, the Division respectfully requests that the Court postpone the Division's answer to that question until after the Commission rules on its Motion to Dismiss, which may make the question moot.

Conclusion

For the reasons set forth above, the Division respectfully requests that the Court postpone the Division's answer to Question (2) until after the Commission rules on its Motion to Dismiss.

Dated: November 1, 2018

Respectfully submitted,



James M. Carlson (202) 551-3711
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 Brief in Response to Questions in October 11, 2018 Order were served on the following on this 1st day of November, 2018, in the manner indicated below:

By Email:

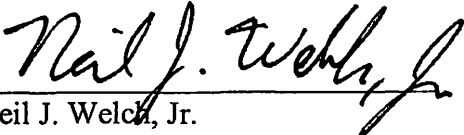
The Honorable James E. Grimes
Administrative Law Judge
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-2557
alj@sec.gov

By First Class Mail:

GS EnviroServices, Inc.
411 Hackensack Ave.
Hackensack, NJ 07601

IPOWorld
18 Los Monteros
Monarch Beach, CA 92629

Parabel, Inc.
1901 S. Harbor City Blvd., Suite 600
Melbourne, FL 32901



Neil J. Welch, Jr.