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OFFICE OF THE SECRETARY

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 MOTION TO THE COMMISSION TO DISMISS PROCEEDINGS AND BRIEF IN SUPPORT

The Division of Enforcement ("Division"), by counsel, hereby moves the Commission to dismiss this administrative proceeding brought pursuant to Section 12(j) of the Securities Exchange Act of 1934 ("Exchange Act"). The respondents are no longer registered under Exchange Act Section 12, and, under the circumstances discussed below, the Division believes it is appropriate to dismiss the proceeding.

Brief in Support

On June 20, 2017, Administrative Law Judge ("ALJ") Foelak issued an initial decision revoking the registrations of the registered securities of GS EnviroServices, Inc., IPOWorld, and Parabel, Inc. (collectively, "Respondents") based on Respondents' repeated failure to file required periodic reports with the Securities and Exchange Commission.¹ The initial decision noted that each Respondent had been served with the

¹ Initial Decision Making Findings and Revoking Registrations by Default, GS *Enviroservices, Inc., et al.*, No. 3-17977 (June 20, 2017), available at https://www.sec.gov/alj/aljdec/2017/id1146cff.pdf. Ciralight settled with the Commission and was no longer a part of the proceeding at that time. *Ciralight Glob.*,

Order Instituting Proceedings in accordance with the Commission's rules, but none had filed an Answer or submitted a response to the ALJ's subsequent order directing Respondents to show cause why they should not be deemed to be in default. On October 3, 2017, the Commission issued a notice that the June 20, 2017 initial decision had become final.² The revocations were effective on October 4, 2017. The Commission's EDGAR database also indicates that the three companies' "Exchange Act registration[s] ha[ve] been revoked." In addition, even before ALJ Foelak had issued her initial decision, on May 17, 2017, Respondent IPOWorld filed a Form 15-12G terminating the registration of its securities.

On November 30, 2017, despite having already issued a finality order, the

Commission included this proceeding among those that it remanded to an ALJ to issue an order on ratification.³ That ratification process was still underway when, on August 22,

2018, the Commission vacated the June 2017 initial decision and October 2017 finality

order and directed that the case be assigned to a new ALJ for proceedings.⁴ The

proceeding was reassigned to ALJ Grimes on September 12, 2018.⁵

In light of this procedural background, the fact that the registrations of the registered securities for the three remaining Respondents have already been revoked, and

Inc., Exchange Act Release No. 80778 (May 25, 2017), available at https://www.sec.gov/litigation/admin/2017/34-80778.pdf.

² Notice that Initial Decision Has Become Final, *GS Enviroservices, Inc., et al.*, No. 3-17977 (Oct. 3, 2017), available at https://www.sec.gov/litigation/admin/2017/34-81813.pdf.

⁷³ Pending Admin. Proc. & Ex. A, Exchange Act Release No. 82178, 2017 WL 5969234 (Nov. 30, 2017), available at https://www.sec.gov/litigation/opinions/2017/33-10440.pdf.

⁴ Pending Admin. Proc. & Ex. A, Securities Act Rel. No. 10536 (Aug. 22, 2018), available at https://www.sec.gov/litigation/opinions/2018/33-10536.pdf.

⁵ Pending Admin. Proc., Nos. 3-15006 et al. (Sep. 12, 2018), available at https://www.sec.gov/alj/aljorders/2018/ap-5955.pdf.

the fact that these Respondents have failed to appear at any stage in the proceedings to date (and have never contested the revocation of their registrations), the Division believes it is appropriate to terminate the proceedings as to GS EnviroServices, Inc., IPOWorld, and Parabel, Inc.

Conclusion

For the reasons set forth above, the Division respectfully requests that the Commission order the dismissal of the proceedings against Respondents GS EnviroServices, Inc., IPOWorld, and Parabel, Inc.

Dated: November 1, 2018

Respectfully submitted,

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COUNSEL FOR DIVISION OF ENFORCEMENT

CERTIFICATE OF SERVICE

I hereby certify that true copies of the Division of Enforcement's Motion to the Commission to Dismiss Proceedings and Brief in Support were served on the following on this 1st day of November, 2018, in the manner indicated below:

By Email:

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

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