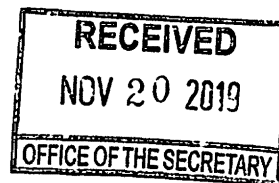


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING
File No. 3-19507

In the Matter of

Seen on Screen TV, Inc., *et al.*

Respondents.

**DIVISION OF ENFORCEMENT'S MOTION FOR
DEFAULT AND BRIEF IN SUPPORT**

The Division of Enforcement ("Division"), by counsel, pursuant to Commission Rules of Practice Rules 154(a) and 155(a)(2) respectfully moves the Securities and Exchange Commission ("Commission") for an order entering a default against Seen on Screen TV, Inc. (CIK No. 879519) ("SONT") and The Pulse Network, Inc. (CIK No. 1521013) ("TPNI"), (collectively "Respondents") in this proceeding and ordering the revocation of the registration of each class of Respondents' securities registered pursuant to Section 12 of the Securities Exchange Act of 1934 ("Exchange Act").

Argument

On September 25, 2019, the Commission issued an Order Instituting Proceedings ("OIP") against Respondents which have securities registered with the Commission under Section 12(g) of the Exchange Act. The OIP alleges the Respondents are delinquent in filing their mandated periodic reports. Because each of the Respondents failed to answer or

otherwise respond to the OIP, the Division now seeks entry of an order finding respondents SONT and TPNI to be in default in this proceeding.

Commission Rule of Practice 220(b) states that where an answer is required to be filed by rule or order, the respondent “shall do so within 20 days after service upon the respondent of the order instituting proceedings” unless a different period is provided by rule or order. Here, the OIP requires “an Answer [to be filed] to the allegations contained in this Order within ten (10) days after service of this Order.” OIP at IV. Commission Rule of Practice 160(a) provides that Saturdays, Sundays and Federal legal holidays are to be counted as part of the 10 day period, and Commission Rule of Practice 160(b) extends that time by three days if service is made by mail.

The Declaration of Gina Joyce to Assist Secretary with Record of Service (attached hereto as Exhibit A) (“Joyce Declaration”) establishes that on September 26, 2019, SONT was served with the OIP, along with a letter from the Commission’s Secretary, and a letter from the Division offering discovery pursuant to Rule of Practice 230 (collectively the “Service Documents”), by Express Mail delivery at the address provided in its last EDGAR filing with the Commission, in accordance with Commission Rule of Practice 141(a)(2)(ii). SONT’s answer to the OIP was due by Wednesday, October 9, 2019. However, SONT has neither filed an answer nor made any other response to the OIP in this proceeding.

The Joyce Declaration also establishes that on September 27, 2019, TPNI was served with the Service Documents by Express Mail delivery at the address provided in its last EDGAR filing with the Commission, in accordance with Commission Rule of Practice 141(a)(2)(ii). TPNI’s answer to the OIP was due by Thursday, October 10, 2019. However, TPNI has neither filed an answer nor made any other response to the OIP in this proceeding.

The Respondents at issue are delinquent in their filings with the Commission and have been delinquent for over two years. In addition, the Respondents' failure to answer supports revocation of the registration of each class of the Respondents' securities. Accordingly, the Division moves for an order, pursuant to Rule 155(a)(2), finding these Respondents to be in default in this proceeding and ordering that the registration of each class of their securities registered pursuant to Exchange Act Section 12 be revoked.

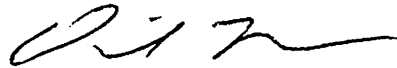
Conclusion

For the reasons set forth above, the Division respectfully requests that the Commission:

- 1) grant the Division's Motion; 2) enter an order of default against SONT and TPNI; and
- 3) revoke the registration of each class of their securities registered pursuant to Section 12 of the Exchange Act.

Dated: November ~~26~~, 2019

Respectfully submitted,

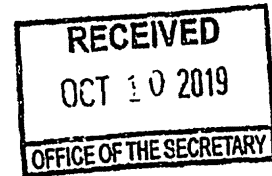


David Misler (202) 551-2210
Gina Joyce (202) 551-4850
Securities and Exchange Commission
100 F Street, N.E., Room 5120
Washington, D.C. 20549-5010

COUNSEL FOR
DIVISION OF ENFORCEMENT

EXHIBIT A

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING
File No. 3-19507

In the Matter of

Seen on Screen TV, Inc., *et al.*,

Respondents.

**DECLARATION OF GINA JOYCE
TO ASSIST SECRETARY WITH RECORD OF SERVICE**

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

2. Among other means, Securities and Exchange Commission (“Commission”) Rule of Practice 141(a)(2)(ii) permits service on a corporation or entity by delivering a copy of an Order Instituting Administrative Proceedings (“OIP”) to an agent authorized by appointment or law to receive such service or, in the case of an issuer with a class of securities registered with the Commission, by sending the OIP via U.S. Postal Service certified, registered, or Express Mail and obtaining a confirmation of attempted delivery on the most recent address shown on the entity’s most recent filing with the Commission.

Further, the OIP in this matter authorizes service of the OIP “by any means permitted by the Commission’s Rules of Practice.” Therefore, the Division asked the Commission’s Secretary to first attempt service on the Respondents via U.S. Priority Mail Express.

3. 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”)¹ that were mailed by the Secretary to the respondents in 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.

4. The Secretary mailed the OIP to respondent Seen on Screen TV, Inc., CIK 879519 (“SONT”), via Priority Mail Express, Tracking No. EJ 140717582 US, to the address shown on its most recent EDGAR filing at 4017 Colby Avenue, Everett, WA 98208. This address is taken from SONT’s last filing with the Commission, which was a Form 12b-25 filed with the Commission on June 13, 2017. The USPS tracking system confirms that the package was delivered on September 26, 2019. See Exhibit 1 at pp. 1 - 2.

5. The Secretary mailed the OIP to respondent The Pulse Network, Inc., CIK 1521013 (“TPNI”), via Priority Mail Express, Tracking No. EJ 140718322 US, to the address shown on its most recent EDGAR filing at 10 Oceana Way, Norwood, Massachusetts 02062. This address is taken from TPNI’s last filing with the

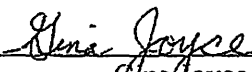
¹Each service package included the OIP, a letter from the Commission’s Secretary, and a letter from the Division offering discovery pursuant to Rule of Practice 230.

Commission, which was a Form 10-Q filed with the Commission on June 24, 2019. The USPS tracking system confirms that the package was delivered on September 27, 2019.

See Exhibit 1 at pp. 3 - 4.

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

Executed on October 10, 2019.


Gina Joyce

USPS Tracking®

[FAQs >](#)

[Track Another Package +](#)

Tracking Number: EJ140717582US

[Remove X](#)

Scheduled Delivery by

FRIDAY

27 SEPTEMBER 2019 ⓘ **by 12:00pm** ⓘ

Feedback

 **Delivered**

September 26, 2019 at 10:48 am
Delivered, In/At Mailbox
EVERETT, WA 98201

[Get Updates](#) ▾

[Text & Email Updates](#) ▾

[Proof of Delivery](#) ▾

[Tracking History](#) ▲

September 26, 2019, 10:48 am
Delivered, In/At Mailbox
EVERETT, WA 98201

Your item was delivered in or at the mailbox at 10:48 am on September 26, 2019 in EVERETT, WA 98201.

10/4/2019

USPS.com® - USPS Tracking® Results

September 26, 2019, 10:34 am
Arrived at Post Office
EVERETT, WA 98201

September 26, 2019, 8:06 am
Arrived at USPS Regional Destination Facility
SEATTLE WA DISTRIBUTION CENTER

September 25, 2019, 8:33 pm
Departed USPS Regional Origin Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

September 25, 2019, 7:45 pm
USPS in possession of item
ROSEDALE, MD 21237

September 25, 2019, 7:37 pm
Arrived at USPS Regional Origin Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

Feedback

Product Information



See Less ^

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

[FAQs](#)

USPS Tracking®

[FAQs >](#)

[Track Another Package +](#)

Tracking Number: EJ140718322US

[Remove X](#)

Scheduled Delivery by

FRIDAY

27 SEPTEMBER 2019 ⓘ by **12:00pm** ⓘ

Feedback

 **Delivered**

September 27, 2019 at 7:02 am
Delivered
NORWOOD, MA 02062

[Get Updates](#) ▾

[Text & Email Updates](#) ▾

[Proof of Delivery](#) ▾

[Tracking History](#) ▲

September 27, 2019, 7:02 am
Delivered
NORWOOD, MA 02062

Your item was delivered at 7:02 am on September 27, 2019 in NORWOOD, MA 02062. Waiver of signature was exercised at time of delivery.

10/4/2019

USPS.com® - USPS Tracking® Results

September 26, 2019, 11:35 am
Addressee Unknown
NORWOOD, MA 02062

September 26, 2019, 9:57 am
Arrived at Post Office
NORWOOD, MA 02062

September 26, 2019, 8:27 am
Arrived at USPS Regional Destination Facility
PROVIDENCE RI DISTRIBUTION CENTER

September 25, 2019, 8:33 pm
Departed USPS Regional Origin Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

September 25, 2019, 7:49 pm
USPS in possession of item
ROSEDALE, MD 21237

September 25, 2019, 7:37 pm
Arrived at USPS Regional Origin Facility
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

Feedback

Product Information



See Less ^

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

[FAQs](#)

CERTIFICATE OF SERVICE

I hereby certify that true copies of the Division of Enforcement's Motion for Default and Brief in Support were served on the following on this 26th day of November, 2019, in the manner indicated below:

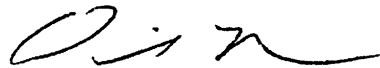
By Hand:
Office of the Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-2557

By UPS:

Seen on Screen TV, Inc.
4017 Colby Avenue
Everett, WA 98208

By UPS:

The Pulse Network, Inc.
10 Oceana Way
Norwood, Massachusetts 02062



David Misler