



December 18, 2007

Federal Communications Commission  
Washington, D.C. 20554

RE: Transfer of Grantee Codes to  
Inilex, Inc. FRN #0014896575  
FCC Grantee Code: VPF

To Whom It May Concern:

On May 29, 2006 Inilex, Inc. purchased the assets of Advantra, International/Punch Telematix. (See attached pages one and twenty-three of the purchase agreement).

On January 16, 2007 Mr. Scott Ferguson, CEO of Inilex, Inc. submitted a written letter requesting a transfer of Grantee Codes to Inilex, Inc. (See attached copy of letter and Grant of Equipment Authorization Certificates).

Inilex, Inc. is filing application Form 731 to transfer FCC Identifiers O33AR100 and O33AR200 from Advantra, International/Punch Telematix, Grantee Code O33, to Inilex, Inc., FCC Grantee Code VPF.

Should you have any questions or require additional information, please don't hesitate to call me directly at 480-889-5676 or email me at [SLFerguson@inilex.com](mailto:SLFerguson@inilex.com).

Sincerely,

A handwritten signature in dark ink, appearing to be "SLF", followed by a long horizontal line extending to the right.

Scott L. Ferguson, CEO

125 West Gemini Drive, Suite E-19-20, Tempe, Arizona 85283  
Phone: (480) 889-5676 Fax: (480) 374-2100

## ASSET PURCHASE AGREEMENT

This Asset Purchase Agreement, dated as of May 29, 2006 (this "Agreement"), is made by and among Inilex, Inc., an Arizona Corporation ("Buyer"), and Punch Telematix nv, a Belgium corporation ("Seller") and subsidiary of Punch International ("Punch"). Seller operates the Business (as defined herein) and owns all of the Purchase Assets (as defined herein). Seller desires to sell, and Buyer desires to purchase, the Purchase Assets for the consideration and on the terms and conditions set forth in this Agreement.

The parties, intending to be legally bound, hereby agree as follows:

**1. DEFINITIONS.** For purposes of this Agreement, the following terms shall have the meanings specified or referred to in this Section 1:

"Accounts Payable" – all obligations of Seller to any other person or entity in connection with the Business.

"Agreement" – as defined in the first paragraph hereof.

"Assembled Inventory" – Non-dated, finished product that is not Damaged Inventory.

"Balance Sheet" – as defined in Section 3.3.

"Best Efforts" – the efforts that a prudent Person desirous of achieving a result would use under similar circumstances to ensure that such result is achieved as expeditiously as possible.

"Bill of Sale" means the Bill of Sale, Assignment and Assumption Agreement between Buyer and Seller in substantially the form attached as Exhibit A.

"Business" – all of the business conducted under the name Advantra, and the engineering, design, manufacture, and distribution of ReFlex wireless products which include Reflex modules, tracking devices, software, firmware, including all Kepler, Karli, Barran and Wirli products and technology, whether in development or already in the marketplace, including all versions, prototypes and underlying research, and any and all products related to Reflex technology, operated by Seller in Brussels, Belgium and through affiliated production or assembly facilities in Slovakia or other countries. Also included is the project GSM Kepler in its current status.

"Buyer" – as defined in the first paragraph of this Agreement.

"Closing" – as defined in Section 2.3

"Closing Date" – as defined in Section 2.3.

"Consent" – any approval, consent, ratification, permission, waiver or other authorization (including any Governmental Authorization).

"Contemplated Transactions" – all of the transactions contemplated by this Agreement.

"Contract" – any agreement, contract, instrument, indenture, guaranty, power of attorney, commitment, promise, assurance, obligation or undertaking.

"Customers" – companies listed on schedule Schedule 2.2(b)


ASSET PURCHASE AGREEMENT

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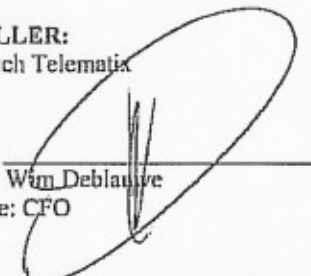
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IN WITNESS WHEREOF, Seller and Buyer have executed this Agreement effective as of the day and year first written above.

**BUYER:**  
Inilex, Inc.

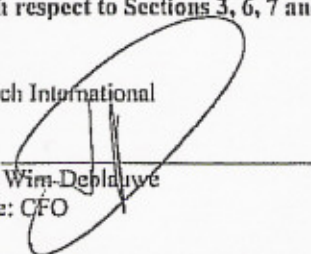
By:   
Mr. Scott Ferguson  
Chief Executive Officer

**SELLER:**  
Punch Telematix

By:   
Mr. Wim Deblauwe  
Title: CFO

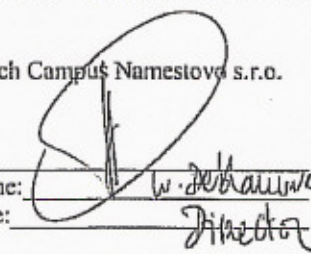
**ACCEPTED AND APPROVED,**  
with respect to Sections 3, 6, 7 and  
8:

Punch International

By:   
Mr. Wim Deblauwe  
Title: CFO

**ACCEPTED AND APPROVED,**  
with respect to Sections 5.11, 7 and  
8:

Punch Campus Namestovo s.r.o.

By:   
Name: W. Deblauwe  
Title: Director





January 16, 2007

Federal Communications Commission  
Washington, D.C. 20554

Attention: Betty:

I Scott L. Ferguson, CEO of Inilex, Inc. FCC Registration Number 0014896575 purchase Advantra International and hereby request a transfer of Grantee Codes to Inilex, Inc.

Grantee Codes From:

Advantra International  
Flanders Language Valley 90  
8900 Leper, -  
Belgium

FCC Identifier: O33AR100 (See attached Copy)  
FCC Identifier: O33AR200 (See attached Copy)

Grantee Codes To:

Inilex, Inc.  
460 South Benson Lane, Suite 7  
Chandler, Arizona 85224

Contact: Scott L. Ferguson, CEO  
Phone: (480) 889-5676  
Fax: (480) 889-5666  
Email: slferguson@inilex.com

Should you have any questions, please don't hesitate to contact me via email or directly at 480-889-5670.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott L. Ferguson", is written over a horizontal line.

Scott L. Ferguson, CEO

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FEDERAL COMMUNICATIONS  
COMMISSION  
WASHINGTON, D.C. 20554

COPY

GRANT OF EQUIPMENT  
AUTHORIZATION  
CertificationAdvantra International  
Flanders Language Valley 90  
8900 Ieper, -  
Belgium

Date of Grant: 11/18/2002

Application Dated: 08/06/2002

Attention: Bernard Vandekerckhove, Chief Executive Officer

## NOT TRANSFERABLE

EQUIPMENT AUTHORIZATION is hereby issued to the named GRANTEE, and is VALID ONLY for the equipment identified hereon for use under the Commission's Rules and Regulations listed below.

FCC IDENTIFIER: 033A1000

Name of Grantee: Advantra International

Equipment Class: PCS Licensed Transmitter

Notes: AR100

Grant Notes	FCC Rule Para	Frequency	Output	Frequency	Emission
		Range (MHz)	Watts	Tolerance	Designator
	90	896.0 - 901.0	1.0	1.0 PM	10K0F1D
	24D	901.0 - 902.0	1.0	1.0 PM	10K0F1D

Modular device.

Output power is conducted. Antenna gain is not to exceed 2.5 dBi for operating duty factor of 50% or less. For mobile exposure conditions, the antenna(s) used for this transmitter must be installed to provide a separation distance of at least 20 cm from all persons. Transmitting device with antenna as shown in this filing is allowed only for OEM integration into host products; consumer or end-user installation is not allowed. This filing includes SAR evaluation data per 2.1091(d)(4); this SAR data is not applicable to demonstrate SAR compliance for any final host products. The highest reported body SAR value for the stand-alone configuration of this filing is 0.07 W/kg at 50% duty factor. OEM integration of this device into a host product operating at closer than 20 cm to any persons requires the submission by Grantee of a Class II permissive change application containing data demonstrating compliance for SAR, spurious emissions, and ERP. Antenna(s) used for this transmitter must not be co-located or operating in conjunction with any other antennas or transmitters. Grantee must inform OEM integrator that a Class II permissive change is required and must be granted prior to marketing of any final host products operating at closer than 20 cm to any persons. Installers and end-users must be provided with antenna installation instructions and transmitter operating conditions for satisfying RF exposure compliance.

Mall To:  
Luc Van Asch, Approvals Engineer  
Advantra  
Flanders Language 90 8900 Ieper  
Ieper, 8900  
Belgium

EA342125

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FEDERAL COMMUNICATIONS  
COMMISSION  
WASHINGTON, D.C. 20554

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GRANT OF EQUIPMENT  
AUTHORIZATION  
CertificationAdvantra International  
Flanders Language Valley 90  
2900 Ieper, -  
BelgiumDate of Grant: 08/30/2002  
Application Dated: 06/13/2002

Attention: Bernard Vandekerckhove, Chief Executive Officer

## NOT TRANSFERABLE

EQUIPMENT AUTHORIZATION is hereby issued to the named GRANTEE, and is VALID ONLY for the equipment identified hereon for use under the Commission's Rules and Regulations noted below.

FCC IDENTIFIER: 013AR200

Name of Grantee: Advantra International

Equipment Class: Licensed Non-Broadcast Station Transmitter

Notes:

Grant Notes	FCC Rule Parts	Frequency	Output	Frequency	Emission
		Range (MHz)	Watts	Tolerance	Designator
	50	886.0 - 901.0	1.92	1.0 PM	12K5F1D
	50	886.0 - 901.0	0.6	1.0 PM	12K5F1D
	24D	901.0 - 902.0	1.92	1.0 PM	12K5F1D

Output power is conducted. Antenna gain is not to exceed 0 dBi. The antenna(s) used for this transmitter must be installed to provide a separation distance of at least 20 cm from all persons and must not be co-located or operating in conjunction with any other antenna or transmitter. Installers and end-users must be provided with antenna installation instructions and transmitter operating conditions for satisfying RF exposure compliance.

## Mail To:

Gary Slater, Approvals Specialist  
KTL  
Saxon Way, Priory Park West  
Hull, HU13 9PB  
United Kingdom

EA374558