



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

September 9, 2011

Via Facsimile

Harold F. Schultz  
Chief Executive Officer  
Vault America, Inc.  
319 Prominence Heights SW  
Calgary, Alberta T3H 2Z6

**Re: Vault America, Inc. (formally known as Moneyflow Systems International, Inc.)  
Form 10-K/A for the fiscal year ended October 31, 2010  
Filed April 29, 2011  
Form 10-K for the fiscal year ended October 31, 2010  
Filed December 23, 2010  
File No. 333-74928**

Dear Mr. Schultz:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Stephen Krikorian

Stephen Krikorian  
Accounting Branch Chief