UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

In the Matter of
CNK Global, Inc. (a/k/a American Life Holding Co., Inc.)

Initial Decision on Default
September 12, 2017

Appearance: David S. Frye for the Division of Enforcement,
Securities and Exchange Commission

Before: Brenda P. Murray, Chief Administrative Law Judge

On July 27, 2017, the Securities and Exchange Commission issued an order instituting proceedings (OIP) pursuant to Section 12(j) of the Securities Exchange Act of 1934, alleging that Respondent has securities registered with the Commission under Section 12(g) of the Exchange Act and is delinquent in its periodic filings. Respondent was served with the OIP, and its answer was due by August 14, 2017. CNK Glob., Inc., Admin. Proc. Rulings Release No. 5007, 2017 SEC LEXIS 2660 (ALJ Aug. 29, 2017). I held a prehearing conference on August 29, 2017, at which counsel for the Division appeared, but no one appeared for Respondent. I ordered Respondent to show cause by September 8, 2017, for its failure to file an answer. Id. To date, Respondent has not filed an answer or responded to the show cause order.

Respondent is in default for failing to file an answer, participate in the prehearing conference, or otherwise defend the proceeding. OIP at 2; 17 C.F.R. §§ 201.155(a)(1)-(2), .220(f), .221(f). Accordingly, I find the allegations in the OIP to be true as to Respondent. 17 C.F.R. § 201.155(a).

Findings of Fact

CNK Global, Central Index Key No. 1187449, is a dissolved Florida corporation located in Seoul, South Korea, with a class of securities registered
with the Commission pursuant to Exchange Act Section 12(g). The company
is delinquent in its periodic filings with the Commission, having not filed any
periodic reports since it filed a Form 10-Q for the period ended June 30, 2014,
which reported a net loss of $31,522 for the prior six months. As of July 25,
2017, the company’s common stock was quoted on OTC Link operated by
OTC Markets Group, Inc., had two market makers, and was eligible for the

In addition to its repeated failures to file timely periodic reports, Respondent failed to heed the delinquency letter sent to it by the Commission’s Division of Corporation Finance requesting compliance with its periodic filing obligations or, through its failure to maintain a valid address on file with the Commission as required by Commission rules, did not receive such letter.

**Conclusions of Law**

Exchange Act Section 13(a) and Rules 13a-1 and 13a-13 require issuers
of securities registered with the Commission pursuant to Exchange Act
Section 12 to file with the Commission current and accurate information in
annual and quarterly reports, even if the registration is voluntary under
Exchange Act Section 12(g). 17 C.F.R. §§ 240.13a-1, 13a-13. Compliance with
these reporting requirements is mandatory. *America's Sports Voice, Inc.,
1239 (June 6, 2007).* Scinter is not required to establish violations of
Exchange Act Section 13(a) and rules thereunder. *SEC v. McNulty, 137 F.3d
732, 740-41 (2d Cir. 1998).* By failing to timely file required annual and
quarterly reports, Respondent violated Exchange Act Section 13(a) and Rules
13a-1 and 13a-13.

**Sanction**

Under Exchange Act Section 12(j), the Commission is authorized, “as it
deems necessary or appropriate for the protection of investors,” to revoke
the registration of a security or suspend the registration for a period not
exceeding twelve months if it finds, after notice and an opportunity for a
hearing, that the issuer of the security has failed to comply with any
provision of the Exchange Act or rules thereunder. 15 U.S.C § 78(j). In
determining what sanctions will adequately protect investors, the
Commission “consider[s], among other things, the seriousness of the issuer’s
violations, the isolated or recurrent nature of the violations, the degree of
culpability involved, the extent of the issuer’s efforts to remedy its past
violations and ensure future compliance, and the credibility of its assurances,


Respondent is culpable because it knew, or should have known, of its obligation to file periodic reports. *China-Biotics, Inc.*, Exchange Act Release No. 70800, 2013 SEC LEXIS 3451, at *37 & n.60 (Nov. 4, 2013) (holding that scienter is not necessary to establish grounds for revocation); *Robert L. Burns*, Investment Advisers Act of 1940 Release No. 3260, 2011 SEC LEXIS 2722, at *41 n.60 (Aug. 5, 2011) (stating that the Commission has “repeatedly held that ignorance of the securities laws is not a defense to liability thereunder”). By not participating in this proceeding, Respondent forfeited an opportunity to show it made efforts to remedy its past violations or to offer any assurance against further violations.

On these facts, it is necessary and appropriate for the protection of investors to revoke the registration of each class of Respondent’s registered securities.

**Order**

I ORDER that, pursuant to Section 12(j) of the Securities Exchange Act of 1934, the registrations of each class of registered securities of CNK Global, Inc. (a/k/a American Life Holding Co., Inc.) are REVOKED.1

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1 This order applies to all classes of Respondent’s securities registered under Section 12 of the Exchange Act, whether or not such securities are specifically identified by ticker symbol or otherwise in this initial decision.
This initial decision shall become effective in accordance with and subject to the provisions of Rule of Practice 360. 17 C.F.R. § 201.360. Pursuant to that Rule, I FURTHER ORDER that a party may file a petition for review of this initial decision within twenty-one days after service of the initial decision. 17 C.F.R. § 201.360(b). A party may also file a motion to correct a manifest error of fact within ten days of the initial decision, pursuant to Rule of Practice 111. 17 C.F.R. § 201.111. If a motion to correct a manifest error of fact is filed by a party, then a party shall have twenty-one days to file a petition for review from the date of the order resolving such motion to correct a manifest error of fact. This initial decision will not become final until the Commission enters an order of finality. The Commission will enter an order of finality unless a party files a petition for review or motion to correct a manifest error of fact or the Commission determines on its own initiative to review the initial decision as to a party. If any of these events occur, the initial decision shall not become final as to that party.

A respondent has the right to file a motion to set aside a default within a reasonable time, stating the reasons for the failure to appear or defend and specifying the nature of the proposed defense. 17 C.F.R. § 201.155(b). The Commission can set aside a default at any time for good cause. Id.

Brenda P. Murray
Chief Administrative Law Judge