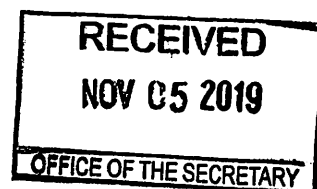


**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**



**ADMINISTRATIVE PROCEEDING**  
**File No. 3-19268**

**In the Matter of**  
  
**Equality Investments, 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 Equality Investments, Inc., (CIK No. 1101911) (“Equality Investments”); Freedom Financial Corporation (CIK No. 1101500) (“Freedom Financial”), and Mustang Resources Inc. (CIK No. 1281842) (“Mustang Resources”) (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 July 24, 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 Equality Investments, Freedom Financial, and Mustang Resources 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 July 26, 2019 and July 27, 2019, service upon Equality Investments of 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”), was attempted 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). Equality Investments’ answer to the OIP was due by Friday, August 9, 2019. However, Equality Investments has not filed an answer or made any other response to the OIP in this proceeding.

The Joyce Declaration also establishes that on September 3, 2019, Freedom Financial 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). Freedom Financial’s answer to the OIP was due by Monday, September 16,

2019. However, Freedom Financial has not filed an answer or made any other response to the OIP in this proceeding.

The Joyce Declaration additionally establishes that on July 27, 2019, Mustang Resources 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). Mustang Resources's answer to the OIP was due by Friday, August 9, 2019. However, Mustang Resources has not filed an answer or 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 Equality Investments,

Freedom Financial, and Mustang Resources; and 3) revoke the registration of each class of their securities registered pursuant to Section 12 of the Exchange Act.

Dated: November 5, 2019

Respectfully submitted,



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James Carlson (202) 551-3711  
Gina Joyce (202) 551-4850  
Securities and Exchange Commission  
100 F Street, N.E., Room 5120  
Washington, D.C. 20549-5010

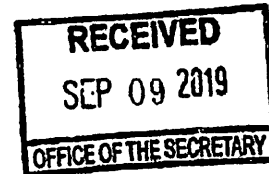
COUNSEL FOR  
DIVISION OF ENFORCEMENT

# **EXHIBIT A**

UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING  
File No. 3-19268

In the Matter of  
  
Equality Investments, 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”)<sup>1</sup> 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](http://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 Mustang Resources Inc., CIK 1281842 (“Mustang Resources”), via Priority Mail Express, Tracking No. EF 200201087 US, to the address shown on its most recent EDGAR filing at 1574 Gulf Rd. #1505, Point Roberts, Washington 98281. This address is taken from Mustang Resources’s last filing with the Commission, which was a Form 10-QSB filed with the Commission on November 14, 2005. The USPS tracking system confirms that the package was delivered on July 27, 2019. *See* Exhibit 1 at pages 1 - 2.

5. The Secretary mailed the OIP to respondent Equality Investments, Inc., CIK 1101911 (“Equality”), via Priority Mail Express, Tracking No. EF 200201135 US, to the address shown on its most recent EDGAR filing at 1109 Miners Alley, Golden, CO 80401. This address is taken from Equality’s last filing with the Commission, which was

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<sup>1</sup>Each 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.

a Form 12b-25 filed with the Commission on November 15, 2005. The USPS tracking system confirms that delivery was attempted on July 26, 2019. The addressee was unknown. The package was returned to the SEC. *See* Exhibit 1 at pages 3 - 5.

6. The Secretary mailed the OIP to respondent Freedom Financial Corporation, CIK 1101500 ("Freedom Financial"), via Priority Mail Express, Tracking No. EF200201095 US, to the address shown on its most recent EDGAR filing at 167 E. Mountain Peak Dr., Draper, Utah 84020. This address is taken from Freedom Financial's last filing with the Commission, which was a Form 10-QSB filed with the Commission on September 9, 2004. The USPS tracking system confirms that delivery was first attempted on July 26, 2019, and eventually delivered on September 3, 2019. *See* Exhibit 1 at pages 6 - 7.

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

Executed on September 9, 2019.

  
\_\_\_\_\_  
Gina Joyce



**Track Another Package** +

**Tracking Number:** EF200201087US

Remove X

Your item was delivered at 10:38 am on July 27, 2019 in POINT ROBERTS, WA 98281 to 1574 TSB SHIPPING. The item was signed for by K DECKER.

 **Delivered**

July 27, 2019 at 10:38 am  
Delivered  
POINT ROBERTS, WA 98281

Feedback

Get Updates 

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**Text & Email Updates** 

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**Proof of Delivery** 

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**Tracking History** 

**July 27, 2019, 10:38 am**

Delivered

POINT ROBERTS, WA 98281

Your item was delivered at 10:38 am on July 27, 2019 in POINT ROBERTS, WA 98281 to 1574 TSB SHIPPING. The item was signed for by K DECKER.

**July 27, 2019, 10:07 am**  
Arrived at Post Office  
POINT ROBERTS, WA 98281

**July 26, 2019, 11:35 pm**  
Arrived at USPS Facility  
EVERETT, WA 98203

**July 26, 2019**  
In Transit to Next Facility

**July 25, 2019, 7:49 pm**  
Departed USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

**July 25, 2019, 7:32 pm**  
Arrived at USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

Feedback

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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 \(https://www.usps.com/faqs/uspstracking-faqs.htm\)](https://www.usps.com/faqs/uspstracking-faqs.htm)

**Track Another Package** +

**Tracking Number:** EF200201135US

Remove X

Your item was delivered at 11:20 am on July 29, 2019 in WASHINGTON, DC 20549 to SEC 20549 R26. The item was signed for by J DAVIS.

 **Delivered**

July 29, 2019 at 11:20 am  
Delivered  
WASHINGTON, DC 20549


Feedback

Get Updates 


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**Text & Email Updates** 

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**Proof of Delivery** 

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**Tracking History** 

**July 29, 2019, 11:20 am**

Delivered  
WASHINGTON, DC 20549

Your item was delivered at 11:20 am on July 29, 2019 in WASHINGTON, DC 20549 to SEC 20549 R26. The item was signed for by J DAVIS.

**July 29, 2019, 11:01 am**  
Out for Delivery  
WASHINGTON, DC 20018

**July 29, 2019, 10:51 am**  
Sorting Complete  
WASHINGTON, DC 20018

**July 29, 2019, 10:40 am**  
Arrived at Post Office  
WASHINGTON, DC 20018

**July 29, 2019, 6:27 am**  
Arrived at USPS Regional Facility  
WASHINGTON DC DISTRIBUTION CENTER

**July 28, 2019**  
In Transit to Next Facility

**July 27, 2019, 5:53 pm**  
Departed USPS Regional Facility  
DENVER CO DISTRIBUTION CENTER

**July 27, 2019, 12:19 pm**  
Addressee Unknown  
GOLDEN, CO 80401

**July 26, 2019, 11:26 am**  
Addressee Unknown  
GOLDEN, CO 80401

**July 26, 2019, 9:04 am**  
Arrived at Post Office  
GOLDEN, CO 80401

Feedback

**July 26, 2019, 6:53 am**  
Arrived at USPS Regional Facility  
DENVER CO DISTRIBUTION CENTER

**July 25, 2019, 7:43 pm**  
Departed USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

**July 25, 2019, 7:32 pm**  
Arrived at USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

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Product Information



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See Less ^

Feedback

## Can't find what you're looking for?

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

**FAQs (<https://www.usps.com/faqs/uspstracking-faqs.htm>)**

**Track Another Package** +

**Tracking Number:** EF200201095US

Remove X

Your item was delivered in or at the mailbox at 1:56 pm on September 3, 2019 in DRAPER, UT 84020.

 **Delivered**

September 3, 2019 at 1:56 pm  
Delivered, In/At Mailbox  
DRAPER, UT 84020

Feedback

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**Proof of Delivery** 

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**Tracking History** 

September 3, 2019, 1:56 pm  
Delivered, In/At Mailbox  
DRAPER, UT 84020

Your item was delivered in or at the mailbox at 1:56 pm on September 3, 2019 in DRAPER, UT 84020.

August 28, 2019  
Redelivery Scheduled  
DRAPER, UT 84020

Reminder to Schedule Redelivery of your item

July 26, 2019, 1:13 pm  
Notice Left (No Authorized Recipient Available)  
DRAPER, UT 84020

July 26, 2019, 10:05 am  
Arrived at Post Office  
DRAPER, UT 84020

July 26, 2019, 7:45 am  
Arrived at USPS Regional Facility  
SALT LAKE CITY UT NETWORK DISTRIBUTION CENTER

July 25, 2019, 7:43 pm  
Departed USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

July 25, 2019, 7:32 pm  
Arrived at USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

Feedback

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Product Information



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See Less ^

## Can't find what you're looking for?

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

FAQs (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

**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 5 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 Certified Mail:


Equality Investments, Inc.  
1109 Miners Alley  
Golden, CO 80401

By Certified Mail:

Freedom Financial Corporation  
167 E. Mountain Peak Dr.  
Draper, Utah 84020

By Certified Mail:

Mustang Resources Inc.  
1574 Gulf Rd. #1505  
Point Roberts, Washington 98281

  
\_\_\_\_\_  
James Carlson