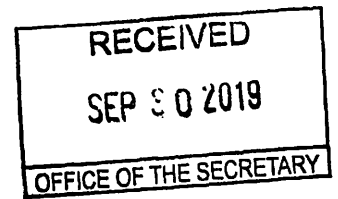


**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**



**ADMINISTRATIVE PROCEEDING**

**File No. 3-19313**

**In the Matter of**

**Alife Corporation, *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) ("Rule"), respectfully moves the Securities and Exchange Commission ("Commission") for an order entering a default against Alife Corporation ("Alife"), Budget Group, Inc. a/k/a BRAC Group, Inc. ("Budget") and Feather Valley Financial Ltd. ("Feather Valley") (collectively "Respondents") in this proceeding and revoking the registration of each class of their securities registered pursuant to Section 12 of the Securities Exchange Act of 1934 ("Exchange Act").

**Argument**

On August 6, 2019, the Commission issued an Order Instituting Proceedings ("OIP") against the 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 seeks entry of an order finding Alife, Budget, and Feather Valley to be in default in this proceeding.<sup>1</sup>

The Declaration of Vinyard Cooke to Assist Secretary with Record of Service establishes that each of the Respondents were served with the OIP by actual or attempted Express Mail delivery in accordance with Rule 141(a)(2)(ii). *See* Exhibit A. In addition to the OIP, the Respondents were also served with a letter offering the Division's investigative file for inspection and copying pursuant to Rule 230. However, none of the Respondents have 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 periods ranging from over two to seventeen 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 Alife Corporation, Budget Group, Inc. a/k/a BRAC Group, Inc. and Feather Valley Financial Ltd. in this proceeding; and 3)

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<sup>1</sup> Alife initially agreed to settle the matter and forwarded an electronic copy of a signed consent by email, but never sent the hard copy version of the executed agreement. When the staff attempted to follow up with the company, all of Alife's email addresses had been suspended and were not delivered and phone calls to the company were not returned.

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 30<sup>th</sup> day of September, 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

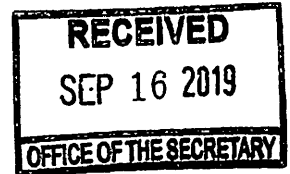
By Certified Mail:  
Alife Corporation  
Inc. Plan (USA)  
Trolley Square, Suite 20C  
Wilmington, DE 19806

Budget Group, Inc. a/k/a BRAC Group, Inc.  
125 Basin St., Suite 210  
Daytona Beach, FL 32114

Feather Valley Financial Ltd.  
One World Trade Center, Suite 800  
Long Beach, CA 90831

  
James Carlson

# EXHIBIT A



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

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-19313**

**In the Matter of**  
  
**Alife Corporation, et al.,**  
  
**Respondents.**

**DECLARATION OF VINYARD COOKE**  
**TO ASSIST SECRETARY WITH RECORD OF SERVICE**

VINYARD V COOKE, 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 Securities and Exchange Commission (“Commission”) Rule of Practice 141(a)(3).

2. Among other means, Rule 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 Alife Corporation, CIK 1681281 ("Alife"), via Priority Mail Express, Tracking No. EZ 195532129 US, to the address shown on its most recent EDGAR filing at 41 Hindhede Walk, Unit 03-02, Singapore 587972. This address is taken from Alife's last filing with the Commission, which was a Form 8-K filed with the Commission on June 22, 2017. The USPS tracking system confirms that the package was delivered on August 13, 2019.

5. The Secretary also mailed the OIP to respondent Alife via Priority Mail Express, Tracking No. EF 200269226 US, to the address of its registered agent, Inc. Plan (USA), Trolley Square, Suite 20C, Wilmington, DE 19806. The USPS tracking system confirms that the package was delivered on August 8, 2019. *See* Exhibit 1 at 1.

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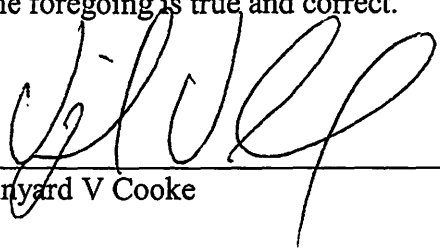
<sup>1</sup>Each service package included the OIP, a letter from the Commission's Secretary, and a letter from the Division offering discovery pursuant to Rule of Practice 230.

6. The Secretary mailed the OIP to respondent Budget Group, Inc. a/k/a BRAC Group, Inc., CIK 922471 (“Budget”), via Priority Mail Express, Tracking No. EF 200269230 US, to the address shown on its most recent EDGAR filing at 125 Basin Street, Suite 210, Daytona Beach, FL 32114. This address is taken from Budget’s last filing with the Commission, which was a Form 8-K filed with the Commission on November 22, 2002. The USPS tracking system confirms that delivery was attempted on August 8, 2019. The package was returned as addressee unknown. *See Exhibit 1 at 4.*

7. The Secretary mailed the OIP to respondent Feather Valley Financial Ltd., CIK 1101361 (“Feather”), via Priority Mail Express, Tracking No. EF 200269243 US, to the address shown on its most recent EDGAR filing at One World Trade Center, #800, Long Beach, CA 90831. This address is taken from Feather’s last filing with the Commission, which was a Form 10-QSB filed with the Commission on September 21, 2004. The USPS tracking system indicated the package was lost and/or not delivered. The staff then resent the same package to the same address via Priority Mail Express, Tracking No. EJ 140718398 US. The USPS tracking system confirms that the package was delivered on September 12, 2019. *See Exhibit 1 at 6.*

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

Executed on September 16, 2019.

  
\_\_\_\_\_  
Vinyard V Cooke

# **EXHIBIT 1**



Track Another Package +

Tracking Number: EF200269226US

Remove X

Scheduled Delivery by

**FRIDAY**

**9** AUGUST 2019 ⓘ by **3:00pm** ⓘ

 **Delivered**

August 8, 2019 at 10:25 am  
Delivered  
WILMINGTON, DE 19806

Get Updates ✓

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Text & Email Updates



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Proof of Delivery



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Tracking History



August 8, 2019, 10:25 am

Delivered

WILMINGTON, DE 19806

Your item was delivered at 10:25 am on August 8, 2019 in WILMINGTON, DE 19806 to SEC 20549 R26. The item was signed for by D FALDSTIN.

Feedback

**August 8, 2019, 5:56 am**  
Departed USPS Regional Facility  
WILMINGTON DE DISTRIBUTION CENTER

**August 8, 2019, 1:46 am**  
Arrived at USPS Regional Destination Facility  
WILMINGTON DE DISTRIBUTION CENTER

**August 7, 2019, 10:30 pm**  
Departed USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

**August 7, 2019, 10:29 pm**  
USPS in possession of item  
LINTHICUM HEIGHTS, MD 21090

**August 7, 2019, 8:26 pm**  
Arrived at USPS Regional Origin 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>)**

Track Another Package +

Tracking Number: EF200269230US

Remove X

Your item was delivered at 7:31 am on August 12, 2019 in WASHINGTON, DC 20549 to SEC 20549 R26. The item was signed for by D HANDEN.

 **Delivered**

August 12, 2019 at 7:31 am  
Delivered  
WASHINGTON, DC 20549

Feedback

Get Updates ✓

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**Text & Email Updates** ✓

---

**Proof of Delivery** ✓

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**Tracking History** ^

August 12, 2019, 7:31 am  
Delivered  
WASHINGTON, DC 20549

Your item was delivered at 7:31 am on August 12, 2019 in WASHINGTON, DC 20549 to SEC 20549 R26. The item was signed for by D HANDEN.

August 11, 2019, 11:40 am  
Available for Pickup  
WASHINGTON, DC 20549

August 11, 2019, 10:36 am  
Arrived at Hub  
WASHINGTON, DC 20018

August 11, 2019, 8:14 am  
Available for Pickup  
WASHINGTON, DC 20549

August 11, 2019, 4:28 am  
Arrived at USPS Regional Facility  
WASHINGTON DC DISTRIBUTION CENTER

August 10, 2019  
In Transit to Next Facility

August 9, 2019, 8:55 pm  
Departed USPS Regional Facility  
ORLANDO FL DISTRIBUTION CENTER

August 9, 2019, 7:39 pm  
Arrived at USPS Regional Facility  
ORLANDO FL DISTRIBUTION CENTER

August 8, 2019, 3:23 pm  
Addressee Unknown  
DAYTONA BEACH, FL 32114

August 8, 2019, 12:09 pm  
Rescheduled to Next Delivery Day  
DAYTONA BEACH, FL 32114

Feedback

August 8, 2019, 10:29 am  
Arrived at Post Office  
DAYTONA BEACH, FL 32114

August 8, 2019, 7:55 am  
Arrived at USPS Regional Facility  
SEMINOLE-ORLANDO FL DISTRIBUTION CENTER

August 7, 2019, 10:21 pm  
Departed USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

August 7, 2019, 8:26 pm  
Arrived at USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

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Product Information

Feedback

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>)**

[Track Another Package +](#)

**Tracking Number:** EJ140718398US

[Remove X](#)

Your item was delivered in or at the mailbox at 11:50 am on September 12, 2019 in LONG BEACH, CA 90831.

 **Delivered**

September 12, 2019 at 11:50 am  
Delivered, In/At Mailbox  
LONG BEACH, CA 90831

[Get Updates](#) 

[Feedback](#)

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**Text & Email Updates**



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**Proof of Delivery**



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**Tracking History**



**September 12, 2019, 11:50 am**

Delivered, In/At Mailbox

LONG BEACH, CA 90831

Your item was delivered in or at the mailbox at 11:50 am on September 12, 2019 in LONG BEACH, CA 90831.

**September 12, 2019, 9:31 am**  
Arrived at Post Office  
LONG BEACH, CA 90802

**September 12, 2019, 7:34 am**  
Arrived at USPS Regional Facility  
LOS ANGELES CA INTERNATIONAL DISTRIBUTION CENTER

**September 11, 2019, 10:46 pm**  
Departed USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

**September 11, 2019, 7:29 pm**  
Arrived at USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

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**Product Information**

Feedback  
✓

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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**

