

UNITED STATES OF AMERICA  
before the  
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934  
Release No. 84744 / December 6, 2018

Admin. Proc. File No. 3-18722

In the Matter of  
  
AMERICAN FIRST FINANCIAL, INC.,  
ASSURANCE GROUP, INC.  
(A/K/A AIR MEDIA NOW!, INC.),  
AVANTAIR, INC., AND  
ELAYAWAY, INC.

Respondents.

ORDER TO SHOW CAUSE

The Securities and Exchange Commission (“Commission”) issued an Order Instituting Proceedings (“OIP”) on September 5, 2018, pursuant to Section 12(j) of the Securities Exchange Act of 1934, against respondents American First Financial, Inc., Assurance Group, Inc. (a/k/a Air Media Now!, Inc.), Avantair, Inc., and eLayaway, Inc.<sup>1</sup>

On September 18, 2018, the Division of Enforcement filed the Declaration of Neil J. Welch, Jr., which stated that, pursuant to Rule 141(a)(2)(ii) of the Commission’s Rules of Practice,<sup>2</sup> service of the OIP was made on American First Financial, Inc. on September 12, 2018, service of the OIP was made on Avantair, Inc. on September 8, 2018, and service of the OIP was made on eLayaway, Inc. on September 8, 2018.<sup>3</sup>

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<sup>1</sup> *American First Financial, Inc.*, Exchange Act Release No. 84041, 2018 WL 4242057 (Sept. 5, 2018).

<sup>2</sup> 17 C.F.R. § 201.141(a)(2)(ii).

<sup>3</sup> The declaration also stated that service of the OIP was made on Assurance Group, Inc. on September 8, 2018. But the declaration stated that service was made at 1150 US Highway 1. The address used in the last filing with the Commission that Assurance Group, Inc. made was 1150 S US Highway 1. The Division of Enforcement is thus directed to ensure that service is made on Assurance Group, Inc. at the correct, complete address, and to file another declaration of service in this proceeding once that has been accomplished.

As stated in the OIP, the answers of respondents American First Financial, Inc., Avantair, Inc., and eLayaway, Inc. were required to be filed within ten days of service of the OIP.<sup>4</sup> As of the date of this order, those respondents have not filed answers. The prehearing conference and the hearing are thus continued indefinitely.

Accordingly, respondents American First Financial, Inc., Avantair, Inc., and eLayaway, Inc. are ORDERED to SHOW CAUSE by December 20, 2018, why the registrations of their securities should not be revoked by default due to their failures to file an answer and to otherwise defend this proceeding. When a party defaults, the allegations in the OIP will be deemed to be true and the Commission may determine the proceeding against that party upon consideration of the record without holding a public hearing.

If respondents American First Financial, Inc., Avantair, Inc., and eLayaway, Inc. fail to respond to this order to show cause, they may be deemed in default, the proceeding may be determined against them, and their securities may be revoked.<sup>5</sup> Upon review of the filings in response to this order, the Commission will either direct further proceedings by subsequent order or issue a final order resolving the matter.

For the Commission, by the Office of the General Counsel, pursuant to delegated authority.

Brent J. Fields  
Secretary

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<sup>4</sup> Rules of Practice 151(a), 160(b), 220(b), 17 C.F.R. §§ 201.151(a), .160(b), .220(b).

<sup>5</sup> Rules of Practice 155, 180, 17 C.F.R. § 201.155, .180; *see American First Financial, Inc.*, 2018 WL 4242057, at \*3 (“If Respondents fail to file the directed Answers, . . . [they] may be deemed in default and the proceedings may be determined against them . . .”).