



SECURITIES AND EXCHANGE COMMISSION OF PAKISTAN

Adjudication Department- II

Adjudication Division

Through Courier

Before

**Hammad Javed, Additional Director / Head of Department
(Adjudication Department – II)**

In The Matter of

1. M/s Alliance In Motion Global (Private) Limited through its Chief Executive;
2. Mr. Eduardo Cabantog, Passport # EC5705668, Chief Executive and Director, M/s Alliance In Motion Global (Private) Limited;
3. Mr. Raymond Asperin, Passport # EC1614479, Director, M/s Alliance In Motion Global (Private) Limited;
4. Mr. Ahmad Muhammad, CNIC # 42501-1541594-9, Director, M/s Alliance In Motion Global (Private) Limited;

Show Cause Notice	No. Adj-II/84/23/IAN-4024/Onsite/2023-720 dated July 25, 2023	
Date on which hearing opportunity provided	Date	Attended by
	March 5, 2024	No one appeared to attend the hearing
	April 23, 2024	No one appeared to attend the hearing
	April 30, 2024	No one appeared to attend the hearing

Order Under Sections 84(2) 500 And 172 For Violation of Sections 84(1) And 26(2) of The Companies Act, 2017

The Securities and Exchange Commission of Pakistan (the ‘*Commission*’) issued show cause notice No. Adj-II/84/23/IAN-4024/Onsite/2023-720 dated July 25, 2023 (the ‘*SCN*’) to **M/s Alliance in Motion Global (Private) Limited** (the ‘*Company*’) having incorporation no. 0098756 and registered address at 61-L Gulberg III, Near Kalma Chowk, Ferozpur Road, Lahore, **Mr. Eduardo Cabantog**, Passport # EC5705668, Chief Executive Officer / Director, **Mr. Raymond Asperin**, Passport # EC1614479, Director and **Mr. Ahmad Muhammad**, CNIC # 42501-1541594-9, Director (collectively referred to as the ‘*Respondents*’) under section 84(2), 500 and section 172 of the Companies Act, 2017 (the ‘*Act*’), for carrying on allegedly unlawful/prohibited business of inviting and accepting unauthorized and illegal deposits from the public, *prima facie*, in violation of sections 84(1) and 26(2) of the Act.

2. The principal line of business of the Company as mentioned in clause 3(i) of the Memorandum of Association (‘*MoA*’) is as under:

To carry on the business of manufacturers, representative, dealers, processors, importers, exporters, purchasers, sellers, brokers, distributors, commission agents, indenters, stores, wholesalers and retailers of all kinds and classes of Home Appliances, Electric and Electronic Equipment, all Types of Food Manufacturing Machines, Dispensers and other electric and electronic equipments and allied products and all kinds of articles in the manufacture of which in form of Home Appliances and also to deal in or manufacture any



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other articles or things of a character similar or analogous to the foregoing or any of them or connected therewith.

3. The paid-up capital of the Company is Rs100,000 divided into 1,000 shares of Rs.100 each. As per Form A October 28, 2019, the particulars of directors of the Company are as under:

Sr	Names	Designation/Status	Shareholding %
1	Eduardo Cabantog	CEO/Director	45%
2	Raymond Asprin	Director	35%
3	Ahmad Muhammad	Director	20%

4. In terms of clause 3 (iii) of MoA, the Company, its Chief Executive and Directors (**'Respondents'**) are restricted from indulging in banking, non-banking finance, stock brokerage business, etc.:

Notwithstanding anything contained in the foregoing sub-clauses of this clause nothing contained herein shall be construed as empowering the Company to undertake or indulge, directly or indirectly in the business of a Banking Company, Non-banking Finance Company (Mutual Fund, Leasing, Investment Company, Investment Advisor, Real Estate Investment Trust management company, Housing Finance Company, Venture Capital Company, Discounting Services, Microfinance or Microcredit business), Insurance Business, Modaraba management company, Stock Brokerage business, forex, real estate business, managing agency, business of providing the services of security guards or any other business restricted under any law for the time being in force or as may be specified by the Commission.

5. The Respondents under clause 3(iv) of MoA of the Company, have undertaken not to engage in the following businesses:

- (a) engage in any of the business mentioned in sub-clause (iii) above or any unlawful operation;
- (b) launch multi-level marketing (MLM), Pyramid and Ponzi Schemes, or other related activities/businesses or any lottery business;
- (c) engage in any of the permissible business unless the requisite approval, permission, consent or licence is obtained from competent authority as may be required under any law for the time being in force.

6. The facts leading to the SCN are that the Commission received a complaint through Prime Minister Performance Delivery Unit, wherein it was alleged that the Company and its directors were accepting advance money from the public on the pretext of selling herbal products to them and induce others to join the Company and earn profit thereon. The complainant further alleged that the Respondents never sent products, rather than delivering the products have asked him to induce other people for investment in the Company and later on blocked his account.

7. In order to ascertain the genuineness of the complaint, the Commission vide order dated March 9, 2022 investigated into affairs of the Company under Section 256 of the Act. The Investigation Team in the Investigation Report dated March 27, 2023 concluded that Company is



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involved in Multilevel Marketing and raising unauthorized deposits on the pretext of selling healthcare products, food supplements and cosmetic products, thus carrying out its business in violation of section 26 and 84 of the Act and clause 41 of Memorandum of Association of the Company.

8. Accordingly, SCN dated July 25, 2023 was issued to the Respondents calling upon them to furnish submissions in writing to explain within ten (10) days of the date of SCN, as to why penalty may not be imposed on:

- (i) **M/s Alliance in Motion Global (Private) Limited** under section 84(2) of the Act, for alleged violation of section 84(1) of the Act.
- (ii) **All the three Directors of the Company**, under section 500 of the Act, for alleged violation of section 26(2) of the Act and disqualification order for a period of up to five years under section 172 of the Act may not be passed against each director of the company.

9. Further, the Respondents were advised to inform if they wanted to avail opportunity of being heard in person or through authorized representative(s).

10. The Respondents neither furnished any written response to the SCN nor submitted any request for availing opportunity of being heard. Follow up reminders for submission of written reply to the SCN were sent to the Respondents at their registered address through courier vide letters dated February 22, 2024, April 15, 2024, April 23, 2024 and via emails dated August 16, 2023, August 24, 2023, March 21, 2024, April 18, 2024, April 24, 2024 which were delivered at aimpakistanpvt.ltd@gmail.com; ed.cabantog.aiminc@gmail.com; bnayve@gmail.com; ahmedmuhammad19921@gmail.com; But the Respondents failed to furnish the required written reply to the SCN to explain their position on the aforesaid alleged violations of sections 84(1) and 26(2) of the Act.

11. The aforementioned letters dated February 22, 2024 and April 15, 2024 were dispatched through courier to the Respondent Directors, **Mr. Eduardo Cabantog**, Passport # EC5705668, Chief Executive Officer / Director and **Mr. Raymond Asperin**, Passport # EC1614479, Director of the Company at the addresses of their country of origin i.e. 759-Josefina, Stsampalco Manila, Philippines and Greehills Garden Square Condominium, Boniserrano Avenue Greenhills, Philippines. But the Couriers vide their email dated April 26, 2024 informed this office that Respondents refused to receive the letters. The said Respondents Directors were also tried to contact over their telephone # (+632) 706 2301 at Manila, Philippines but the call remained unresponded.

12. However, Mr. Ahmad Muhammad, Director of the Company replied this office' email dated August 24, 2023 whereby contact for dispatch of SCN to Mr. Edurado Cabantog, CEO/Director and Mr. Raymond Asperin, Director, was sought from him (since both the Respondent Directors are Philippine National). Contents of email reply dated August 24, 2023 received from Mr. Ahmad Muhammad are reproduced hereunder: -

"This is with reference to your email regarding showcause notice. I just noticed email thus writing the reply. As discussed earlier that I resigned from Alliance In Motion



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Global (Pvt) Ltd Pakistan in 2017 and my reappointment was not in my knowledge which was done by Amin & Co. However; being a good citizen it is my responsibility to respond to your showcase. Please grant me some time so that I can contact the company in Philippine and get back to you.

13. In reply to the reminders for written submissions to the SCN / hearing notices dated April 15, 2024 and April 23, 2024 Mr. Ahmad Muhammad further informed vide email dated May 09, 2024 that:

"This is with reference to your email regarding hearing at SECP. I have already explained several times that I had resigned from Alliance In Motion Global (Pvt) Ltd in 2017, later Amin & Co made me Director of the company without my consent and used fake signs. I cooperated with SECP beyond my limits by conveying your messages to the company in the Philippines. Company stopped its operations due to bribe demands, fake cases and misguidance of Tax consultants i.e. Amin & Co who even denied to be their consultants. I left Pakistan and right now trying to earn bread for my family in Dubai. You are requested to directly contact Alliance In Motion Global. I have nothing to do with any matters."

14. The Investigation Team vide email dated December 6, 2022 asked Mr. Ahmad Muhammad to clarify regarding credit and debit transactions made by him into and from the bank account of the Company during post resignation period as per his claim. The relevant part of the email by the Investigation Team to Mr. Ahmad Muhammad is reproduced here below:

Quote

Dear Mr. Ahmed,

As you have communicated to the Investigation Team during statement recording and below email as well that you have resigned from the Company in 2017 and then never re-joined the Company, then please clarify about following transactions which were made by you:

Amount credited into the Bank Account of the Company by Ahmed Muhammad having CNIC: 4250115415949

CNIC	Name of Depositor	Date	Credit in Company's Bank A
42501-1541594-9	Ahmed	28 November 2017	105,000
42501-1541594-9	Ahmed	03 February 2020	100,000
42501-1541594-9	Ahmed	11 January 2021	40,000

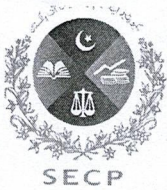
Amount debited from the Bank Account of the Company by Ahmed Muhammad having CNIC: 4250115415949

CNIC	Name of Beneficiary	Date	Debit in Company's Bank A
42501-1541594-9	Ahmed	27 February 2018	300,000
42501-1541594-9	Ahmed	27 February 2018	300,000

Please respond to the above email by tomorrow 3rd December 2022.

Regards,

Unquote



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In response to the above quoted email from the Investigation Team of the SECP, Mr. Ahmad Muhammad vide his email dated December 8, 2022 replied to the Investigation Team, contents of which are reproduced hereunder for ready reference:

Quote

Good Day!!

I recently received an email from you stating that to explain 5 transactions.

I have told SECP team that I resigned Alliance In Motion Global (Pvt) Ltd in 2016, may be implemented in 2017.

I am a freelancer and at the beginning company made me director just for the purpose of getting registration and other legal formality. As soon as all the requirements were done, they asked me to resign as director. I resigned at that time.

I then purchased products from them to sell in the market for which I paid to them time to time.

Because I had already worked with them, they requested me 2-3 times to withdraw money for their use. However; I had not been signatory since I resigned the company in 2017.

As you already know that company is not operational and they are willing to close it. You can just let them know the process of closure to end this matter.

And I am not signatory of this company so I cannot apply closure. But I can communicate to the owners if you send me process of company closure.

Regards

Unquote

Mr. Muhammad's another email dated February 8, 2023 addressed to the Investigation Team with a subject title "Authority Letter" wherein he accepts that he signed the Power of Attorney/Authority Letter being a director of the Company, the relevant contents of the email are reproduced here below:

Quote

Subject: Authority Letter

[EXTERNAL MESSAGE]

This e-mail originated from outside of SECP. Do not click links or open attachments unless you recognize the sender of the e-mail and know the content is safe.

Dear concern,

This is with reference to a request received from my Ex-Employer i.e. Alliance In Motion Global (Pvt) Ltd. They have requested me to sign an authority letter which is going to be issued to Mr. Tahir Nazir (Advocate High Court).

Though I am not the part of the company and I am unaware as to how Amin & Co appointed me Director of this company again yet I am signing the authority letter just to cooperate with the company and cooperate with Govt of Pakistan to close this investigation and windup the company.

This email is to bring it in record that my signatures are just a good gesture for Govt of Pakistan because I am not the part of the company yet signing because in documents I was made director of the company.

Regards
Muhammad Ahmed

Unquote



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15. In view of the above cited email replies received from Mr. Ahmad Muhammad and his claim of resignation from the directorship of the Company, it has been noticed that contrary to his claim of having resigned from the directorship of the Company, Mr. Ahmad Muhammad is still director on the board of the Company as per Form-A (Annual Return having share capital and list of directors on the board of the Company), Form-28 (Return containing consent to act as director) and Form-29 (Return containing particulars of directors/officers of the Company) filed with the relevant Registrar on June 1, 2020, November 12, 2019 and February 15, 2022 respectively. Moreover, Mr. Ahmad Muhammad has also been acting as director of the Company and signing the documents as evident from the above cited emails. Furthermore, neither there is any documentary evidence on record regarding his resignation in writing from the directorship of the Company nor has any change thereon been reported to the Commission till date.

16. However, in reply to the SCN dated July 25, 2023, Mr. Muhammad Taiyab, FCA, of M/s Taiyab Shahid & Co., Chartered Accountants, (“the Authorized Representative”) vide letter dated September 20, 2023 attaching therewith a copy of board resolution of the Company comprising authorization dated September 12, 2023 signed by Mr. Ahmad Muhammad as director of the Company in their favour stated that:

“respondents have appointed me as the authorized representative [Authorizing instrument is annexed]. The learned officer is requested to please allow a time of one month to peruse the records and prepare a detailed reply to the show cause notice. It is further requested to please provide the copies of the documents relating to the case which are on record so far.”

17. In order to conclude the adjudication proceedings initiated through the instant SCN and to provide the Respondents opportunity of making representation and of being heard, a hearing was scheduled for March 5, 2024 before the Head of Department through zoom link with the advice to submit written reply to the SCN without further loss of time before February 29, 2024. On date of hearing i.e. March 5, 2024, the Authorized Representative was reminded over his cell to attend the hearing through zoom link scheduled at 10:30 a.m. He stated that he would send his reply through his email. The Authorized Representative vide email reply dated March 8, 2024 wrote to this office that:

“This is with reference to the notice issued by you bearing C. No. 241 dated 22.02.2024 which was received on 01.03.2024 through courier. In this notice, we were required to attend the hearing relating to the matter on 05.03.2024. However, we could not attend the hearing due to lack of records and documents relating to the case as all the records and documents of the company were seized by the FIA.”

18. The required information/documents were provided to the Authorized Representative vide this office’ email dated March 21, 2024 advising him to furnish the required reply to the SCN in writing by March 27, 2024 to proceed to conclude the matter without further loss of time. The Authorized Representative of the Respondents failed to reply to this email. However, the Respondents were provided two more opportunities for making representation and of being heard and hearings were scheduled for April 23, 2024 and April 30, 2024 advising them to submit written submissions to the SCN. The Respondents were also advised through the hearing notices that they may, if they so desire, visit the 2nd Floor of Securities & Exchange Commission of Pakistan’s Head Office situated at NIC Building, 63 Jinnah Avenue, Blue Area, Islamabad, at the



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scheduled date and time, in case they so intend to appear before the Head of Department Adjudication-II for the scheduled hearing in person. But no one turned up to attend the hearing rather Mr. Muhammad Tayyab of Taiyab Shahid & Co., Chartered Accountants, the Authorized Representative of the Respondent vide email dated April 29, 2024 withdrew the authorization stating that:

“With reference to this hearing notice, this is to inform you that we, Taiyab Shahid & Co., are no longer representing ALLIANCE IN MOTION GLOBAL (PVT) LIMITED in this matter as the management has not provided us the information and documents required for preparation of reply.”

19. It is pertinent to mention here that three hearing opportunities were provided to the Respondents which were scheduled on March 5, 2024, April 23, 2024 and April 30, 2024. The hearing notices were sent at correspondence address of the Company as well as at available residential addresses of directors the Company, which were returned back as undelivered. While, the reminders/hearing notices along with copies of the SCNs were delivered at email at aimpakistanpvt.ltd@gmail.com; ed.cabantog.aiminc@gmail.com; bnayve@gmail.com; ahmedmuhammad19921@gmail.com. The Respondents were informed vide the aforesaid reminders/hearing notices/emails that the matter would be decided on the basis of available record in case they did not submit any written response to the SCN and fail to attend the hearings.

20. Regarding service of SCN and reminders, section 53 of the Act provides “a document or information may be served on the company or any of its officers at the registered office of the company against an acknowledgement or by post or courier service or through electronic means or in any other manner as may be specified.”

21. It is evident from the foregoing that the Respondents were provided various opportunities to explain their position with regard to alleged violation of section 26 and section 84 of the Act. The Respondents opted not to explain/defend their position despite service/delivery of SCN and reminders/hearing notices. Accordingly, the SCN proceedings are being concluded, considering the material available on record.

Issue to be determined:

22. It was alleged in the instant SCN that the Respondents were involved in inviting and accepting unauthorized and illegal deposits/investments from general public, *prima facie*, in violation of sections 84(1), 26(2) of the Act read with MoA of the Company. In order to arrive at decision, I have gone through the facts of the case, record of the Company, documents available with the Commission including findings of the investigation team vide Investigation Report dated March 27, 2023 and relevant provisions of law. Before analyzing the allegations, it seems appropriate to discuss the relevant provisions of law on the subject-matter and reproduce the same hereunder: -

Legal Framework:

In terms of section 84 of the Act, all companies, excluding banking companies and such other companies or class of companies as the Commission may notify in this behalf, are prohibited from inviting, accepting or renewing deposits from the public. Further, the



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term deposit has also been defined in section 84 of the Act as any amount accepted or borrowed by a company other than a loan raised by issue of debentures or a loan obtained from a banking company or financial institution or an advance against sale of goods or provision of services in the ordinary course of business. Section 84 of the Act is reproduced below for ease of reference:

84. Prohibition on acceptance of deposits from public. — (1) *On and after the commencement of this Act, no company shall invite, accept or renew deposits from the public:*

Provided that nothing in this sub-section shall apply to a banking company and such other company or class of companies or such deposits as the Commission may, notify in this behalf.

Explanation. — *For the purposes of this section, “deposit” means any deposit of money with, and includes any amount borrowed by, a company, but shall not include a loan raised by issue of debentures or a loan obtained from a banking company or financial institution or an advance against sale of goods or provision of services in the ordinary course of business.*

In terms of section 26(2) of the Act, a company shall not engage in a business which is (a) prohibited by any law for the time being in force in Pakistan; or (b) restricted by any law, rules or regulations, unless necessary licence, registration, permission or approval has been obtained or compliance with any other condition has been made. Deposit taking by companies is not only prohibited under the Act but also under the Banking Companies Ordinance, 1962. Accordingly, any company engaged in deposit invitation/taking commits violation of section 26(2) of the Act, reproduced below for ease of reference:

26. Business and objects of a company. — (2) *A company shall not engage in a business which is—*

(a) prohibited by any law for the time being in force in Pakistan; or

(b) restricted by any law, rules or regulations, unless necessary licence, registration, permission or approval has been obtained or compliance with any other condition has been made.”

In terms of clause 3 of MoA, the Respondents have undertaken that they shall not engage in any unlawful / prohibited business activities. Inviting and accepting deposits is unlawful/ prohibited in terms of sections 84(1) and 26(2) of the Act.

The issue to be determined in the instant matter is whether the Respondent were part of deposit invitation and acceptance from public, in violation of section 84 and section 26(2) of the Act.



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Analysis of the issue:

23. In order to substantiate the matter, an official of Company Registration office, Lahore made an onsite visit to the registered office of the Company and *inter alia* submitted the following findings:-

*“...During the web search, it was revealed that Alliance in Motion Global, Inc. is the parent company of Alliance in Motion Global (Pvt.) Limited. The web link of above company is (<https://www.allianceinmotion.com/home>). As per website, the Alliance in Motion Global Inc. is engaged in **Multilevel Marketing** and Direct selling with over 5 million distributors across the globe. The board of directors of Alliance in Motion Global Inc. are:*

- a) Dr. Eduardo Cabantog*
- b) Mr. John Asperin*
- c) Francis Miguel*

*The web search regarding business activities of the Alliance in Motion Global (Pvt) Limited is also carried out and found the website having link <https://aimglobalpakistan786.wordpress.com/>. The website clearly mentioning that company is involved in **Multilevel Marketing** activity. Another website <https://prosperousmichelletoday.blogspot.com/2018/12/how-to-join-in-aim-global-pakistan-2019.html> describing how you can become part of Alliance In Motion Global (Pvt) Limited.*

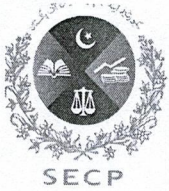
FIA Investigation

It is further informed that FIA through letter dated 16.11.2018 called documents/record of the company. In this regard, the undersigned has also signed seizure memo at FIA. As per discussion with investigation officer of FIA, the investigation is pending for illegal sales of drugs by the company.

24. In order to ascertain the genuineness of the complaints, the Commission vide order dated March 10, 2021 carried out inspection of books of accounts of the Company and the Inspector through inspection report dated August 09, 2021 recommended investigation into the affairs of the Company.

25. Accordingly, the Commission vide order dated March 09, 2022, followed by Supplementary order February 17, 2023, investigated the Company under Section 256 of the Act.

26. The investigation team in the Investigation Report dated March 27, 2023 concluded that the Respondents were engaged in the prohibited and unlawful business of inviting and accepting unauthorized deposits from the public by offering investment packages of different amounts ranging Rs. 7000 to Rs. 147,000/- under MLM business model, *prima facie*, in violation of



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sections 84(1) and 26(2) of the Act, read with clause 3 of the MoA of the Company. The significant findings of the investigation team are as under:

- (i) The Respondents after getting incorporated the Company opened the following bank account in name of the Company and accepted deposit from general public therein:-

Account Title		ALLIANCE IN MOTION GLOBAL (PRIVATE) LIMITED			
Bank Name	Account Opening Date	Account Number	Signatory	Total Amount Debit (Rs)	Total Amount Credit (Rs)
Meezan Bank Limited (Account	23-05-2016	02370102179087	Korskier/ Brian	113,990,013	113,990,013

**Initially Mr. Ahmed Muhammad was the signatory and later on Mr. Korskier Mira Cantoria and Brian Murillo Nayve was authorized by the Board of Directors in their meeting held on November 26, 2016.*

- (ii) Deposits from the public amounting to Rs. **113.990** million were received in the aforementioned bank account. Being the signatories of the bank account, the directors of the Company, *prima facie*, were beneficiary of the funds raised from the general public through illegal deposit taking and they withdrew Rs. **113.990 million** from the bank accounts.
- (iii) The Respondents were offering through website/social media promo package of different amount ranging from Rs. 7,000, to 147,000/-
- (iv) The investigation team reviewed credit transactions of the aforesaid bank account and observed that amounts equivalent to promo packages were credited as under: -

Promo Packages of Company as per Website and social media posts (Rupees)	Amount Credited in Bank Account	# of Transactions with similar amount	Accumulated balance in each category
7,000	7,000	1145	8,015,000
8,000	8,000	619	4,952,000
10,000	10,000	102	1,020,000
21,000	21,000	237	4,977,000
63,000	63,000	12	756,000
147,000	147,000	3	441,000
Total Credits against Promo Package		2118	20,161,000

- (v) The investigation team further noticed that multiple amounts of promo packages for examples Rs. 14,000, 28,000 35,000 etc. were also credited into the said bank account of the Company.



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- (vi) On April 13, 2022, the investigation team visited registered office of the Company but did not find there office of the Company.
- (vii) October 03, 2022, the investigation team visited business office of the Company reportedly located in front of Benazir Bhutto Hospital Rawalpindi, but, the said office was found vacant and locked.
- (viii) On June 17, 2022, Mr. Ahmed Muhammad director of the company appeared before the investigation team for recording of statement, He *inter alia* stated that:

I setup the Company only for the purpose of marketing of the products.

Company products were Coffee; tooth paste; soap; chocolate milk (brand name MyChoco); food supplement and few cosmetics etc.

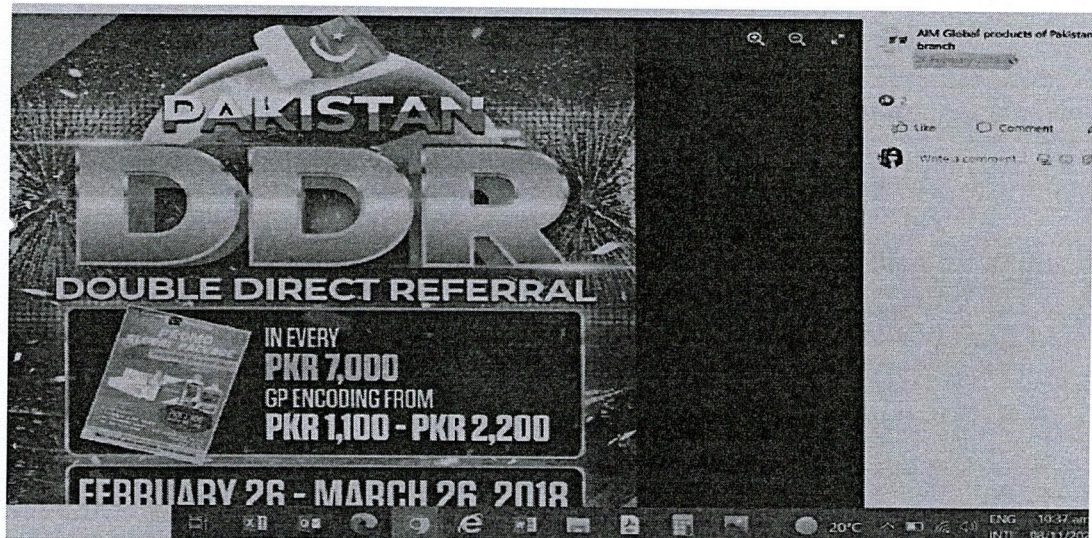
Company used to sell the products both on individual and on Promo package basis.

The Parent Company runs its business worldwide. In few countries, they are operating on MLM model and in other, on franchise basis.

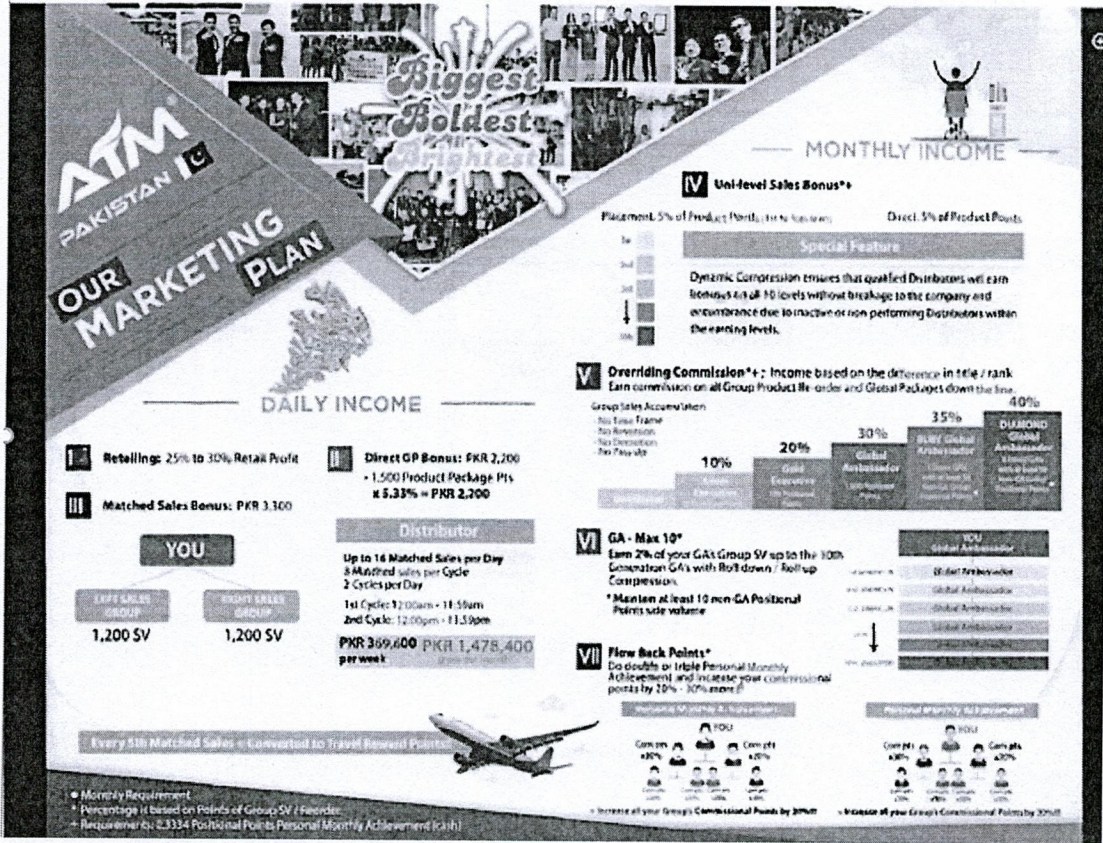
Business model: Binary points-based Commission on one Package Salex. For example, Mr. X is a Sale Agent and sells the product to Mr. A (left side/leg), then Mr. X will get 350 points and Rs. 1,100. And then Mr. X sell the Product to Mr. B (Right side/leg), then Mr. X will get 350 points and Rs. 1,100. Both 350 points and 350 points will match and Mr. X will get 700 points in his name and will receive a pairing bonus of Rs. 825. Similarly if Mr. A sell the product to Mr. A1 and Mr. A2, Mr. A will get same commission as Mr. X. Further, for sales made by Mr. A, Mr. X will get 700 points and consequently his total points will become 1400 i.e. (700 points – on sales to Mr. A + 700 points – on sales to Mr. A1 and Mr. A2 by Mr. A).

There were two ranks with respect to achievement of point sales target i.e. Gold Executive (100 points) and Silver Executive (10 points).

- (ix) Advertisements extracted from the social media page of the Company are pasted below, which *prima facie* reveal that the Respondents were offering promo package of different amounts to the general public ranging from Rs. 7000 to Rs. 147,000:



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ATM PAKISTAN 10
OUR MARKETING PLAN

Biggest Boldest Brightest

MONTHLY INCOME

IV Uni-level Sales Bonus*
 Placement: 5% of Product Points, (10% for 1st year) Direct: 5% of Product Points

Special Feature
 Dynamic Compression ensures that qualified Distributors will earn bonuses in all 10 levels without breakage to the company and encouragement due to inactive or non-performing Distributors within the earning levels.

V Overriding Commission*+ : Income based on the difference in title / rank
 Earn commission on all Group Product Re-orders and Global Packages down the line

Group Sales Accumulation
 No Limit Frame
 No Attention
 No Demotion
 Per Flexible

10% Gold Executive
20% Gold Ambassador
30% Global Ambassador
35% BILLY Global Ambassador
40% DIAMOND Global Ambassador

YOU
 LEFT SELLER GROUP: 1,200 SV
 RIGHT SELLER GROUP: 1,200 SV

Distributor
 Up to 16 Matched Sales per Day
 8 Matched sales per Cycle
 2 Cycles per Day
 1st Cycle: 12:00am - 11:59am
 2nd Cycle: 12:00pm - 11:59pm
 PKR 399,600 PKR 1,478,400 per week

VI GA - Max 10*
 Earn 2% of your GA's Group SV up to the 10th Generation GA's with Roll-down / Roll-up Compression
 *Maintain at least 10 mm GA Positional Points side volume

YOU Global Ambassador
 Global Ambassador
 Global Ambassador
 Global Ambassador
 Global Ambassador

VI Flow Back Points*
 Go double or triple Personal Monthly Achievement and increase your commission points by 20% - 30% more!

Personal Monthly Achievement
 YOU: 100%
 YOU: 100%
 YOU: 100%
 YOU: 100%

Every 5th Matched Sales is converted to Travel Bonus Points

* Monthly Requirement
 + Percentage is based on Points of Group SV / Follower
 + Requirement is: 8,334 Positional Points Personal Monthly Achievement (PAM)

+ Increase all your Group's Commission Points by 20%
 + Increase all your Group's Commission Points by 30%



NEW PAKISTAN GLOBAL PACKAGES

PKR 8,000

F
 GLOBAL PACK
 1 WHITE LIGHT
 2 NC WASHES (FEMINE/MASCULINE)
 2 NC DC BAR SOAP
 1 NC OXYGEN BAR

G
 GLOBAL PACK
 1 PEFRECT WHITE
 3 NC WAHSES (FEMINE/MASCULINE)
 2 NC DC BAR SOAP
 2 NC OXYGEN BAR

H
 GLOBAL PACK
 1 BURN SLIM
 1 NC WASH (FEMINE/MASCULINE)
 1 NC DC BAR SOAP
 1 NC OXYGEN BAR

I
 GLOBAL PACK
 1 C24/7
 1 CARELEAF
 1 NC WASH (FEMINE/MASCULINE)
 1 NC TOOTHPASTE
 2 NC OXYGEN BAR

WORTH PKR 8,300
WORTH PKR 8,600
WORTH PKR 8,600
WORTH PKR 10,950

DIRECT REFERRAL BONUS: PKR 1,100
PAIRING BONUS: PKR 825
BINARY POINTS: 300

ALLTANCE GLOBAL



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Adjudication Department-II
Adjudication Division

www.EconomyDriver.com
ECONOMY DRIVER PLAN 2.0 PACKAGE

PAKISTAN

PKR 10,000
WORTH PKR 11,700

- 6 C247 RPs
- 3 COMPLETE RPs
- 1 CHOLEDUZ RP
- 1 RESTORLYF RP

Direct Ref. Bonus PKR 1500
Pairing Bonus PKR 1600
Stairstep Points PKR 350
Binary Points 350

Earn more with the Newest & Hottest Economy Driver Plan of AIM Global Pakistan 2.0!!!
HURRY! BUY NOW & INFORM YOUR GROUP!
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ALLIANCE IN MOTION PAKISTAN

GLOBAL PACKAGE
PKR 21,000
1200 BINARY POINTS

3 C247 Blister Packs
3 Complete PE Blister Packs
1 Choleduz
1 Liven Coffee
1 Kiddi 24/7 Nutra Gummies

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SECURITIES & EXCHANGE COMMISSION OF PAKISTAN

Adjudication Department-II Adjudication Division

SECP/ADJ/2012/14/27
REGISTRATION AND BUSINESS PROGRAM - KAMAYE HEALTHCARE
This is the potential income in one year... on a monthly DUPLICATION OF 1 or so called "POWER OF 2" Invite 2 people who are the same like you, who have willingness to earn and like to work with you. People who also have dreams that they want to pursue because this is the life that is waiting for you and your family... and teach those 2 people you invited to do what you did to earn in this business... as Simple as That.

MONTH	NO. OF DISTRIBUTOR	NO. OF PAIRS	MONTHLY EARNINGS
JANUARY	2	1	PKR 3,300
FEBRUARY	4	2	PKR 6,600
MARCH	8	4	PKR 13,200
APRIL	16	8	PKR 26,400
MAY	32	16	PKR 52,800
JUNE	64	32	PKR 105,600
JULY	128	64	PKR 211,200
AUGUST	256	128	PKR 422,400
SEPTEMBER	512	256	PKR 844,800
OCTOBER	1,024	512	PKR 1,689,600
NOVEMBER	2,048	1,024	PKR 3,379,200
DECEMBER	4,096	2,048	PKR 6,758,400
			PKR 6,758,400

IMAGINE THIS...
WHAT IF...???

- You only sponsor two (2) Distributors for the 1st Month and...
- Every one else doing same thing in 1 year. If you follow 1 year Program

Your INVESTMENT earn and grow

Now let me share with you exactly how we earn money directly into our bank accounts daily, weekly, and monthly. I must say, there is nothing better than for you to wake up, check your phone, and you notice a deposit in your bank account. We literally get paid in our sleep. Here are the three investment package we offer. We have three levels of ONE time investments:

C. PKR 21,000 investment for "1 account" can earn you up to PKR 67 LAKH or more every year for a life time. And you need to introduce only two people to do the business with you.

B. PKR 63,000 investment for "3 accounts" can earn you up to PKR 2 CRORE or more every year for life and you need to introduce 4 people to do the business with you.

A. PKR 147,000 investment for "7 accounts" can earn you up to PKR 4 CRORE or more every year for life and you need to introduce 8 people to do the business with you.

Your one time investment would get you several of our top of the line health products equivalent to whatever package you choose. You can either choose to use it, give it away, or sell it. It's up to you. NOTE: YOUR INVESTMENT COMES WITH PRODUCTS. YOU INVEST ONLY ONCE AND YOU ARE NOT REQUIRED TO SELL! (Optional) Aim Global don't give you target. No maintenance, No stockpiling, No compulsory buying and selling and they pay every day.

27. Considering the foregoing, it appears that the Respondents were *prime facie* involved in inviting and accepting deposits/investments from general public in violation of sections 26 and 84 of the Act and its MoA.

28. The above-mentioned alleged violations warrant the following actions against the Respondents:

(i) **Action against the Company under sections 84(2) of the Act for violation of section 84(1) of the Act, which provides as under:**

84. Prohibition on acceptance of deposits from public. — (2) Where a company accepts or invites, or allows or causes any other person to accept or invite on its behalf, any deposit, the company shall be punishable-

(a) where such contravention relates to the acceptance of any deposit, with penalty which shall not be less than the amount of the deposit so accepted; and

(b) where such contravention relates to the invitation for any deposit, shall be liable to a penalty of level 3 on the standard scale.

(ii) **Action against the Chief Executive and Directors of the Company under section 172 and 500 of the Act for violation of section 26(2) of the Act.**



SECURITIES & EXCHANGE COMMISSION OF PAKISTAN

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172. Disqualification orders. — (1) In any of the circumstances stated hereunder, the Commission may pass a disqualification order against a person to hold the office of a director of a company for a period up to five years beginning from the date of order-

(d) the business of the company in which he is or has been a director, has conducted to defraud its creditors, members or any other persons or for a fraudulent or unlawful purpose, or in a manner oppressive of any of its members or that the company was formed for any fraudulent or unlawful purpose; or

(h) the person is involved in illegal deposit taking; or

500. Penalty for carrying on ultra vires business.—If any business or part of business carried on or any transaction made, by a company is ultra vires of the company shall be an offence and every person who acted as a director or officer of the company and is responsible for carrying on such business shall be liable to a penalty of level 3 on the standard scale, and shall also be personally liable for the liabilities and obligations arising out of such business or transaction.

Decision: -

29. In view of the foregoing and considering (a) a complaint received against the Respondents through public (b) investigation team's findings, that Company is involved in Multilevel Marketing and raising of unauthorized deposits on the pretext of selling healthcare products, food supplements and cosmetic products, thus carrying out its business in violation of section 26 and 84 of the Act and clause 43 of Memorandum of Association of the Company. (c) advertisement material posted by the Respondents on social media for invitation and acceptance of deposits from the public (c) non-response to the SCN coupled with non-attendance of hearing despite provision of various opportunities of being heard coupled with delaying tactics and evasiveness. It is, therefore, established that the Respondents were carrying on unlawful/prohibited business of inviting and accepting unauthorized deposits from the public in violation of sections 26(2) and 84(1) of the Act read with clauses 40 to 43 of MoA of the Company. The violations of section 26(2) and section 84(1) attract penal provisions of sections 84(2) and 500 of the Act against the Company and its directors, which triggers the violation of section 172 of the Act regarding disqualification of directors of the Company.

30. I, therefore, in exercise of the powers, conferred upon me, under sections 84(2) and 500 of the Act, hereby impose the following penalties on the Company and its directors for carrying on unlawful/prohibited business of inviting and accepting unauthorized deposits from the public in violation of sections 26(2) and 84(1) of the Act:

Imposed on	Penalty		Description
	Amount (Rs.)	Imposed under section	
M/s Alliance in Motion Global (Private) Limited	114 million	84(2)(a) of the Act	For acceptance of deposit of Rs114 million in violation of section 84(1) of the Act.



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M/s Alliance in Motion Global (Private) Limited	100 million	84(2)(b) of the Act	For invitation of deposit in violation of section 84(1) of the Act.
Mr. Eduardo Cabantog, Chief Executive Officer/Director (Passport # EC5705668), M/s Alliance in Motion Global (Private) Limited	100 million	500 of the Act	For carrying on business ultra vires of the Company.
Mr. Raymond Asperin, Director, (Passport# EC1614479), M/s Alliance in Motion Global (Private) Limited	100 million	500 of the Act	For carrying on business ultra vires of the Company.
Mr. Ahmad Muhammad, Director, (CNIC # 42501- 1541594-9), M/s Alliance in Motion Global (Private) Limited	100 million	500 of the Act	For carrying on business ultra vires of the Company and signatory of bank account wherein deposit from general public was accepted.

31. Further I, in exercise of the powers conferred upon me under section 172 of the Act, hereby disqualify **Mr. Eduardo Cabantog, Passport # EC5705668, Mr. Raymond Asperin, Passport# EC1614479, and Mr. Ahmad Muhammad, CNIC # 42501- 1541594-9** from becoming a director/chief executive of any company for a period of 5 years from the date of this Order under section 172(1)(d) and (h) of the Act, for inviting and accepting deposits in violation of sections 84(1) and 26(2) of the Act.

32. **M/s Alliance in Motion Global (Private) Limited, Mr. Eduardo Cabantog, Passport # EC5705668, Mr. Raymond Asperin, Passport# EC1614479 and Mr. Ahmad Muhammad, CNIC # 42501- 1541594-9** are directed to deposit the aforesaid penalty in the account of the Commission being maintained in the designated branches of MCB Bank Limited or United Bank Limited within 30 days of the receipt of this Order and furnish Original Deposit Challan to this office.

33. This order is being issued without prejudice to any other proceedings or action that the Commission, National Accountability Bureau, Federal Investigation Agency or any other authority, bureau, agency or institution may initiate, in accordance with relevant provisions of law, against the Respondents or any other officer in respect of unauthorized/illegal deposit taking activities undertaken by them.

(Hammad Javed)

**Additional Director / Head of Department
Adjudication Department-II**

Announced: June 6, 2024