



ENFORCEMENT AND INVESTOR PROTECTION DEPARTMENT

MEMORANDUM

FOR : THE COMMISSION *EN BANC*

THRU : CHAIRPERSON EMILIO B. AQUINO

FROM : ENFORCEMENT AND INVESTOR PROTECTION DEPARTMENT

SUBJECT : **SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN**

DATE : **4 September 2023**

Respectfully submitted for the consideration and approval of the Commission En Banc is the request of the EIPD for the posting of an Advisory on the Commission's website concerning the activities of **SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN**.

Based on the reports and information gathered by the Commission, **SPRHY GOLD INVESTMENT** is enticing the public to invest in their business scheme entitled **SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN** for a promise of high monetary rewards or profits.

As posted online, **SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN**, is offering investments to the public for minimum amount of **Php5,000.00 up to Php500,000.00**. Investor can earn **15% up to 30% after 30 days** as shown below.

SPRHY
GOLD INVESTMENT
LOCK IN 3 MONTHS

<i>Pay-in</i>	<i>Profit</i>
5K ♦ 7,250 🇵🇭	
10K ♦ 14,500 🇵🇭	
15K ♦ 21,750 🇵🇭	
20K ♦ 29,000 🇵🇭	
25K ♦ 36,250 🇵🇭	
30K ♦ 43,500 🇵🇭	
35K ♦ 50,750 🇵🇭	
40K ♦ 58,000 🇵🇭	
45K ♦ 65,250 🇵🇭	
50K ♦ 72,500 🇵🇭	

SPRHY GOLD INVESTMENT

🌟 Lock in 30 days 🌟

<i>Pay-in</i>	<i>Profit</i>	<i>Payout</i>
10K ♥ 1,500 🇵🇭 11,500		
20K ♥ 3,000 🇵🇭 23,000		
30K ♥ 4,500 🇵🇭 34,500		
40K ♥ 6,000 🇵🇭 46,000		
50K ♥ 7,500 🇵🇭 57,500		
60K ♥ 9,000 🇵🇭 69,000		
70K ♥ 10,500 🇵🇭 80,500		
80K ♥ 12,000 🇵🇭 92,000		
90K ♥ 13,500 🇵🇭 103,500		
100K ♥ 15,000 🇵🇭 115,000		

SPRHY GOLD INVESTMENT

🦋 Lock in 45 DAYS 🦋

<i>Capital</i>	<i>Profit</i>	<i>Total</i>
10K (M) 2,300 🇵🇭 12,300		
15K (M) 3,450 🇵🇭 18,450		
20K (M) 4,600 🇵🇭 24,600		
25K (M) 5,750 🇵🇭 30,750		
30K (M) 6,900 🇵🇭 36,900		
35K (M) 8,050 🇵🇭 43,050		
40K (M) 9,200 🇵🇭 49,200		
45K (M) 10,350 🇵🇭 55,350		
50K (M) 11,500 🇵🇭 61,500		

<https://www.facebook.com/sprhyallinone/>

SPRHY GOLD INVESTMENT

🌟 Lock in 3 months 🌟

<i>Pay-in</i>	<i>Profit</i>	<i>Payout</i>
10K ♥ 4,500 🇵🇭 14,500		
20K ♥ 9,000 🇵🇭 29,000		
30K ♥ 13,500 🇵🇭 43,500		
40K ♥ 18,000 🇵🇭 58,000		
50K ♥ 22,500 🇵🇭 72,500		
60K ♥ 27,000 🇵🇭 87,000		
70K ♥ 31,500 🇵🇭 101,500		
80K ♥ 36,000 🇵🇭 116,000		
90K ♥ 40,500 🇵🇭 130,500		
100K ♥ 45,000 🇵🇭 145,000		



Sprhy
CASH PALUWAGAN
30,000
6k monthly
5 months
DM us to join!
<https://www.facebook.com/maryrhose.l>



Sprhy
CASH PALUWAGAN
50,000
10k monthly
5 months
DM us to join!
<https://www.facebook.com/maryrhose.l>



Sprhy
CASH PALUWAGAN
200,000
40k monthly
5 months
DM us to join!
<https://www.facebook.com/maryrhose.l>



Sprhy
CASH PALUWAGAN
500,000
100k monthly
5 months
DM us to join!
<https://www.facebook.com/maryrhose.l>

The aforementioned investment scheme of **SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN** clearly involves offering and sale of securities in the form of an “*investment contract*” as defined under Section 3.1 of the Securities Regulation Code. The investor makes an investment of money in the minimum amount of Php5,000.00 in a common enterprise which is **SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN**.

Considering that the scheme of **SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN**, involves the offer and sale of securities, it is required to have a secondary license from the Commission pursuant to Sections 8 and 12 of the SRC.

However, an investigation conducted by this Department shows that **SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN** is not registered with the Commission as a corporation or partnership based on an initial verification from the Commission's Online Document Retrieval System (ODRS), and has no physical office. **SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN** transacts with the public or prospective investors only through social media such as online group chats on Facebook (FB).

SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN is not authorized to solicit investments from the public as this entity did not secure prior registration and/or license to solicit investment from the Commission as prescribed under Sections 8 and 12 of the Securities Regulation Code based on the Online Document Retrieval System (ODRS).

The scheme offered by **SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN** to the public is clearly a "**Ponzi Scheme**" where monies from new investors are used in paying "fake profits" to prior investors and is designed mainly to favor its top recruiters and prior risk takers and is detrimental to subsequent members in case of scarcity of new investors.

The offering and selling of securities in the form of investment contracts using the "**Ponzi Scheme**" which is fraudulent and unsustainable, is **NOT** a registrable security. The Commission will not issue a License to Sell Securities to the Public to persons or entities that are engaged in this business or scheme.

In view of the foregoing and in order to protect the public pending investigation of the activities of **SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN**, the EIPD recommends the posting of an Advisory on the Commission's website.

Attached hereto is the draft advisory for the consideration and approval of the Commission En banc.

Respectfully submitted.


OLIVER O. LEONARDO
Director



ENFORCEMENT AND INVESTOR PROTECTION DEPARTMENT

SEC ADVISORY

This is to inform the public that SPRHY GOLD INVESTMENT is NOT AUTHORIZED TO SOLICIT INVESTMENT FROM THE PUBLIC.

Based on the reports and information gathered by the Commission, **SPRHY GOLD INVESTMENT** is enticing the public to invest in their business scheme entitled **SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN** for a promise of high monetary rewards or profits.

As posted online, **SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN**, is offering investments to the public for minimum amount of **Php5,000.00 up to Php500,000.00**. **Investor can earn 15% up to 30% after 30 days.**

Pay-in	Profit
5K	7,250
10K	14,500
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40K	58,000
45K	65,250
50K	72,500

Sprhy
CASH PALUWAGAN
30,000
6k monthly
5 months
DM us to join!
<https://www.facebook.com/maryrhose.l>

Briefly, an “investment contract” exists when there is an investment or placement of money in a common enterprise with a reasonable expectation of profits to be derived from the efforts of others which is prominent in the scheme of, **SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN**.

As such, the Securities Regulation Code (SRC) requires that said offer and/or sale of securities must be duly registered with the Commission and that the concerned entity and/or its agents should have the appropriate registration and/or license to sell such securities to the public.

Based on the Commission's database, **SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN**, is **NOT REGISTERED** as a corporation or partnership and **OPERATES WITHOUT THE NECESSARY LICENSE AND/OR AUTHORITY to solicit, accept or take investments/placements from the public nor to issue investment contracts and other forms of securities defined under Section 3 of the Securities Regulation Code (SRC).**

Further, the scheme employed by, **SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN** has the characteristics of a "**Ponzi Scheme**" where money from new investors are used in paying "fake profits" to prior investors and is designed mainly to favor its top recruiters and prior risk takers and is detrimental to subsequent members in case of scarcity of new investors.

The offering and selling of securities in the form of investment contracts using the "**Ponzi Scheme**" which is fraudulent and unsustainable, is **NOT** a registrable security. The Commission will not issue a License to Sell Securities to the Public to persons or entities that are engaged in this business or scheme.

In view thereof, the public is hereby advised **NOT TO INVEST** or to **STOP INVESTING** in the investment scheme being offered by, **SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN** as well as to any other entities having the same or similar schemes and to exercise caution in dealing with any individuals or group of persons soliciting investments or recruiting investors for and on behalf of **SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN**.

Those who act as salesmen, brokers, dealers or agents, representatives, promoters, uplines, recruiters, influencers, endorsers and enablers of **SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN**, in selling or convincing people to invest in the investment scheme being offered by the said entity including soliciting investments or recruiting investors through the internet may be held criminally liable under Section 11 of the Financial Products and Services Consumer Protection Act (FCPA) and under Section 28 of the SRC and both penalized separately with a **maximum fine of Five Million Pesos (Php5,000,000.00) or imprisonment of Twenty One (21) years or both pursuant to Section 73 of the SRC** (*SEC vs. Oudine Santos, G.R. No. 195542, 19 March 2014*).

Furthermore, the names of all those involved will be reported to the Bureau of Internal Revenue (BIR) so that the appropriate penalties and/or taxes be correspondingly assessed.

Should you have any information regarding any investment solicitation by any individual or group of individuals on behalf of **SPRHY GOLD INVESTMENT/SPRHY CASH PALUWAGAN**, please send your report through email at epd@sec.gov.ph.

For the information and guidance of the public.

Makati City, 4 September 2023