

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, DC 20549

ADMINISTRATIVE PROCEEDING
File Nos. 3-17984 through 3-17989



In the Matter of the Registration Statements
of

CANSO ENTERPRISES LTD.,
PRIVIOZ,
UNIVERSAL MOVERS CORP.,
LORILAY CORP.,
FORMOUS CORP., and
LION PRINT CORP.

**DIVISION OF ENFORCEMENT'S *MOTION IN LIMINE* TO INTRODUCE SWORN
INVESTIGATIVE TESTIMONY IN LIEU OF LIVE TESTIMONY**

The Division of Enforcement ("Division") moves pursuant to Rule 235 of the Securities and Exchange Commission's ("Commission") Rules of Practice to introduce the sworn investigative testimony of James Burns and Mark Milman at the hearing in the above-referenced matter:

1. Rule 235(b) provides that "[a]n adverse party may use for any purpose . . . investigative testimony . . . of a party or anyone who, when giving the sworn statement . . . was the party's officer, director, or managing agent."

2. Burns was subpoenaed in the Commission's investigation of *In the Matter of Panoply Group Corp.* (HO-12407).

3. Pursuant to that subpoena, Burns gave sworn investigative testimony to officers of the Commission on August 4, 2014.

4. At the time of his sworn investigative testimony, Burns was Canso Enterprises, Ltd.'s ("Canso") President, Secretary, and Treasurer.

5. Milman also was subpoenaed in the Commission's investigation of *In the Matter of Panoply Group Corp.* (HO-12407).

6. Pursuant to that subpoena, Milman gave sworn investigative testimony to officers of the Commission on August 27, 2014.

7. At the time of his sworn investigative testimony, Milman was Privoz's President and Chief Executive Officer.

8. Because Burns and Milman were officers of parties that are adverse to the Division in this proceeding, Burns' and Milman's sworn investigative testimony is admissible under Rule 235(b) and may be used by the Division for any purpose.

9. Alternatively, Burns' and Milman's sworn investigative testimony is admissible pursuant to Rule 235(a)(2).

10. Rule 235(a)(2) provides that a motion to introduce sworn investigative testimony may be granted if the sworn investigative testimony is otherwise admissible in the proceeding and the "witness is out of the United States, unless it appears that the absence of the witness was procured by the party offering the prior sworn statement."

11. Burns is a Canadian citizen whose last known mailing address was a post office box in Toronto, Canada.

12. Milman is believed to be an Israeli citizen whose last known addresses were in Israel and the Ukraine.

13. Therefore, Burns and Milman are both "witness[es] [who are] out of the United States" and their absences from the United States were not procured by the Division.

14. As required by Rule 235(a)(2), Burns' and Milman's sworn investigative testimony is otherwise admissible in this proceeding under Rule 320. As the officers of Canso

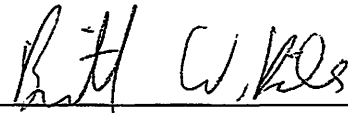
and Privoz who filed the Companies' Registration Statements, Burns' and Milman's sworn investigative testimony is directly relevant to the Division's allegations that Canso's and Privoz's Registration Statements contained false and misleading statements. Indeed, Burns' and Milman's sworn investigative testimony directly contradicted Canso's and Privoz's Registration Statements, and those contradictions are the bases for the Division's claims.

15. In addition to being relevant, Burns' and Milman's sworn investigative testimony is not excludable under Rule 320 because it is not immaterial, unduly repetitious, or unreliable. The sworn investigative testimony is the best evidence of the contradictions between what Burns and Milman were willing to testify to under oath versus what they acceded to including in the Registration Statements they filed with the Commission. The sworn investigative testimony also is unquestionably reliable because Burns and Milman both were provided with Form 1662, advised of their Fifth Amendment rights against self-incrimination, and warned that false statements in the sworn investigative testimony could subject Burns and Milman to criminal prosecution for perjury.

16. Because Burns' and Milman's sworn investigative testimony is otherwise admissible and Burns and Milman are out of the United States, Burns' and Milman's sworn investigative testimony is admissible under Rule 235(a)(2).

17. Accordingly, the Division seeks an order — under either Rule 235(a)(2) or Rule 235(b) — authorizing it to introduce Milman's and Burns's investigative testimony at the hearing in the above-referenced matter.

Dated: May 30, 2017



Britt Whitesell Biles
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CERTIFICATE OF SERVICE

I hereby certify that an original and three copies of the foregoing were filed with the Securities and Exchange Commission, Office of the Secretary, 100 F Street, NE, Washington, D.C. 20549-9303, and that a true and correct copy of the foregoing has been served in the form indicated below, on this 30th day of May 2017, on the following persons entitled to notice:

The Honorable Brenda Murray
Administrative Law Judge
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-2557
Service via Hand Delivery and email: ALJ@sec.gov

Canso Enterprises, Ltd.
c/o State Agent and Transfer Syndicate, Inc.
Registered Agent for Canso Enterprises, Ltd.
112 North Curry Street
Carson City, NV 89703-4934
Service via UPS Next Day Delivery


Privoz
c/o State Agent and Transfer Syndicate, Inc.
Registered Agent for Privoz
112 North Curry Street
Carson City, NV 89703-4934
Service via UPS Next Day Delivery

Universal Movers
c/o Eastbiz.com
Registered Agent for Universal Movers
5348 Vegas Drive
Las Vegas, NV 89108
Service via UPS Next Day Delivery

Lorilay Corp.
c/o Incorp. Services
Registered Agent for Lorilay Corp.
3773 Howard Hughes Pkwy
Ste 500S
Las Vegas, NV 89169-6014
Service via UPS Next Day Delivery

Formous Corp.
c/o Incorp. Services
Registered Agent for Formous Corp.
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Lion Print Corporation
c/o State Agent and Transfer Syndicate, Inc.
Registered Agent for Lion Print
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**DIVISION OF ENFORCEMENT'S *MOTION IN LIMINE* TO INTRODUCE, IN LIEU OF
LIVE TESTIMONY, A DECLARATION MADE PURSUANT TO 28 U.S.C. § 1746**

The Division of Enforcement ("Division") moves pursuant to Rule 235(a)(2) of the Securities and Exchange Commission's ("Commission") Rules of Practice to introduce at the hearing in the above-referenced matter a declaration made pursuant to 28 U.S.C. § 1746:

1. Rule 235(a)(2) provides that a motion to introduce a declaration made pursuant to 28 U.S.C. § 1746 may be granted if the declaration is otherwise admissible in the proceeding and the "witness is out of the United States, unless it appears that the absence of the witness was procured by the party offering the prior sworn statement."

2. The declaration that is the subject of this motion *in limine* was made by Marlee Engel and is attached hereto.

3. Ms. Engel is a Branch Chief in the Commission's Office of International Affairs ("OIA").

4. As a part of her job responsibilities, Ms. Engel assists the Division with investigations and litigation that require foreign assistance, including obtaining information and documents from foreign jurisdictions.

5. At the Division's request, Ms. Engel assisted the Division in its investigation of *In the Matter of Panoply Group Corp. (HO-12407)*. Specifically, Ms. Engel requested, under the International Organization of Securities Commissions ("IOSCO") Multilateral Memorandum of Understanding ("MMOU"), information about Canso Enterprises, Ltd. ("Canso") from the Ontario Securities Commission ("OSC"). The information requested was contact information for a sample of 18 of 39 purported Canso shareholders who were identified in Canso's Registration Statement. Canso claimed that each of the 18 purported shareholders lived in the Toronto area.

6. The information Ms. Engel received from OSC cast significant doubt on the existence of the 18 purported Canso shareholders. OSC was unable to locate any of the 18 purported shareholders. OSC found that the addresses that Canso provided for the 18 purported shareholders were linked to properties that had been owned for long periods of time by the same people — likely senior citizens — who had no known connections to the 18 purported Canso shareholders. OSC reported to Ms. Engel that the 18 purported Canso shareholders likely were fictitious.

7. Ms. Engel made a declaration pursuant to 28 U.S.C. § 1746 that documents the information that she requested and received from the OSC.

8. Pursuant to Rule 235(a)(2), the Division seeks to introduce this declaration in lieu of Ms. Engel's live testimony.

9. Ms. Engel is in Ontario, Canada on work-related travel in support of the Commission's mission. Ms. Engel is attending an international law enforcement conference in her official capacity as a Branch Chief in OIA.

10. Ms. Engel is not scheduled to return from Ontario until after the hearing in this matter. Ms. Engel's travel was booked more than six weeks ago.

11. Accordingly, Ms. Engel is out of the United States and her absence was not procured by the Division.

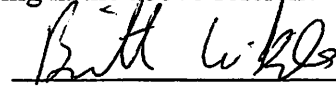
12. As required by Rule 235(a)(2), Ms. Engel's declaration is otherwise admissible in this proceeding under Rule 320. Ms. Engel's declaration is directly relevant to the Division's allegations that Canso's Registration Statement contained false and misleading statements. The information that Ms. Engel obtained from OSC contradicts the Registration Statement's claim that Canso had 39 shareholders who would sell their securities in an initial public offering. Indeed, that is one of the false and misleading statements alleged in the Order Instituting Proceedings against Canso.

13. In addition to being relevant, Ms. Engel's declaration is not excludable under Rule 320 because it is not immaterial, unduly repetitious, or unreliable. Ms. Engel's declaration sets forth actions that she undertook as a part of her official job responsibilities in OIA. The information request to OSC and the response therefrom were made pursuant to a formal international cooperation program between the Commission and the OSC for the purpose of facilitating cross-border securities investigations and enforcement actions. So the declaration is documenting official communications between the Commission and a foreign regulator that were carried out pursuant to an international agreement. Further, Ms. Engel — a lawyer admitted to practice in Maryland and a supervisor in OIA — made the declaration under penalty of perjury.

14. Because Ms. Engel's declaration is otherwise admissible and Ms. Engel is out of the United States, Ms. Engel's declaration is admissible under Rule 235(a)(2).

15. Accordingly, the Division seeks an order authorizing it to introduce Ms. Engel's declaration, made pursuant to 28 U.S.C. § 1746, at the hearing in the above-referenced matter.

Dated: May 30, 2017



Britt Whitesell Biles
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Division of Enforcement
SECURITIES AND EXCHANGE
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CERTIFICATE OF SERVICE

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Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-2557
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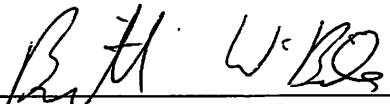
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Registered Agent for Privoz
112 North Curry Street
Carson City, NV 89703-4934
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Universal Movers
c/o Eastbiz.com
Registered Agent for Universal Movers
5348 Vegas Drive
Las Vegas, NV 89108
Service via UPS Next Day Delivery

Lorilay Corp.
c/o Incorp. Services
Registered Agent for Lorilay Corp.
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Las Vegas, NV 89169-6014
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Britt Whitesell Biles, Esq.

I, Marlee M. Engel, declare:

1. I have personal knowledge of the facts set forth in this declaration:

2. I am employed as a Branch Chief in the Office of International Affairs (“OIA”) of the Plaintiff, U.S. Securities and Exchange Commission (“SEC”), in Washington, DC. I work in OIA’s international enforcement cooperation and assistance group. My duties include, among other things, assisting the SEC’s Division of Enforcement with investigations and litigation that require foreign assistance, including supervising OIA staff in connection with the provision of such assistance.

3. I am familiar with efforts to obtain records and information from foreign jurisdictions. For example, the SEC is a signatory to the International Organization of Securities Commissions (“IOSCO”) Multilateral Memorandum of Understanding (“MMOU”). The IOSCO MMOU represents a common understanding amongst its signatories about how they will consult, cooperate, and exchange information with each other for securities investigation and enforcement purposes.

4. When seeking assistance under the IOSCO MMOU, it is OIA’s practice to send a written request for assistance to the securities authority in the foreign jurisdiction where the records or information are located, signed by a supervisor or case manager. In the request, OIA will specify the assistance that the Enforcement Division staff is seeking.

5. If the foreign authority is able to assist, it will use its domestic processes and procedures to obtain the requested records or information, and will provide the responsive records or information to the SEC.

6. Consistent with the paragraph 4, in connection with the investigation entitled *In the Matter of Panoply Group Corp.* (HO-12407), OIA sent a Request for Assistance under the IOSCO MMOU to the Ontario Securities Commission

("OSC"), dated December 16, 2014. I wrote the request, but I was not a supervisor in December 2014, so Matthew B. Greiner, the Branch Chief responsible for Canada at that time, signed the Request. Attached as Exhibit 1 is a true and correct copy of this Request.


7. In response to that Request, and consistent with paragraph 5, on December 18, 2014, the OSC informed me of their conclusion, based on their searches, that the names listed in the SEC's Request were likely fictitious. OSC staff also inquired whether SEC staff had any additional identifying information regarding the persons listed in our Request, but we did not.

8. That same day, the OSC also informed me that OSC staff conducted land registry searches for the addresses provided and the results of those searches revealed that the homes were generally all owned for long periods of time by the same people (possibly senior citizens), and that the owners of these homes did not match any of the names SEC staff provided for those addresses.

9. I work in the SEC's Washington D.C. office, but at time of the signing of this declaration I am in Ontario, Canada on official business that has been planned for several months and will not return until after this hearing. My travel was confirmed as far back as February 23, 2017 and ticketed as of April 12, 2017, well before the filing of this proceeding on May 12, 2017.

10. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 30th day of May, 2017 in Ontario, Canada.



Marlee M. Engel