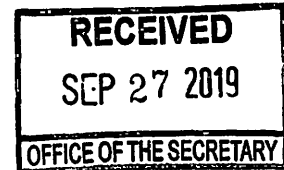


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING

File No. 3-19343

In the Matter of

Healthway Shopping Network,
Monetiva, Inc., and
Unity Global Holdings Ltd.,

Respondents.

REPLY TO MONETIVA, INC.'S
OPPOSITION TO MOTION FOR
RULING ON THE PLEADINGS
AGAINST MONETIVA, INC.

The Division of Enforcement ("Division"), by undersigned counsel, pursuant to Rules 154 and 250 of the Commission's Rules of Practice, respectfully files its reply in support of its Motion for a Ruling on the Pleadings against Monetiva, Inc. ("Monetiva").

I. **Monetiva's Brief in Opposition (the "Opposition") Fails to Offer Any Legal or Factual Reason for Denying the Division's Motion**

Monetiva is more than a year delinquent in its filings. There is no factual dispute on that dispositive issue. Based upon a simple review of the *Gateway* factors, the securities registration of Monetiva should be revoked. The Commission should reject Monetiva's arguments to the contrary.

In its Opposition, Monetiva first argues against the "penalty of delisting," but this argument is flawed and is irrelevant to the *Gateway* analysis regarding revocation. In fact, Monetiva's securities have *never* been listed on *any* exchange. Monetiva does not have a ticker symbol., and its securities have never been publicly quoted or traded.¹

¹ In reality, Monetiva is just one man, Pierre Sawaya, selling stock subscriptions to investors. Mr. Sawaya is the officer, director, and had been the sole shareholder until he

In its Opposition, Monetiva next promises to become current. That promise is not credible, because Monetiva has no revenue. But even if the Commission were to give credibility to this promise, it would still be no different from the Respondent in the case of *Ablest, Inc.*, Initial Decision Rel. No. 453, (Feb. 15, 2012), where the Commission revoked the Respondent's registration despite the fact that it made its delinquent filings during the summary disposition briefing schedule.

Nor should the Commission give any weight to the promise of attempting to meet deadlines that have already passed. The lifecycle of an administrative proceeding is not a race to finish past-due filings, or an extension of the due dates for those filings. In *Nature's Sunshine Products, Inc.*, a case in which the Commission ordered revocation notwithstanding the fact that the respondent made some of its delinquent filings during the pendency of the proceedings, the Commission specifically noted some of the important policy considerations that weigh against giving issuers undue credit for compliance efforts undertaken following institution of an administrative proceeding:

Dismissal [of the administrative proceeding] would reward those issuers, who fail to file required periodic reports when due over an extended period of time, become the subject of Exchange Act Section 12(j) revocation proceedings, and then, on the eve of hearings before the law judge or, in this case, oral argument on appeal, make last-minute filings, in an effort to bring themselves current with their reporting obligations, while prolonging indefinitely the period during which public investors would be without accurate, complete, and timely reports (that comply with the requirements of the Exchange Act and its rules and regulations) to make informed investment decisions.

Id., 95 SEC Docket 13488, Exchange Act Rel. No. 59268 at 14 (Jan. 21, 2009).

began selling his stock to investors. By last year, he had already raised more than \$300,000 through an issuer that reported that it had no revenue in its last SEC filing.

Finally, Monetiva claims that it did not timely file its periodic reports because its accounting firm, KCCW Accountancy Corp. (“KCCW”) dragged its feet. Again, this argument is without merit. Even if Monetiva’s difficulties with KCCW are accurate, and KCCW somehow impeded Monetiva’s ability to file periodic reports, the Commission has repeatedly declined to absolve registered companies of their reporting obligations based upon such excuses, especially where the respondent blames its inability to file on third-party actions. *See, e.g., America’s Sports Voice, Inc.*, Securities Exchange Act of 1934 Rel. No. 55511, 2007 SEC LEXIS 534, at *4-5 (March 22, 2007) (holding that electrical fire, removal of equipment, and change of auditors did not constitute a valid excuse from filing); *Indigenous Global Development Corp.*, Initial Decision Rel. No. 325, 2007 SEC LEXIS 47, at *8 -9 (Jan. 12, 2007) (misconduct by disgruntled employees, including work slowdown and deletion of financial records, did not excuse the issuer from making its filings).

In fact, the Commission has found that a company’s refusal to accept responsibility for its delinquency works against it, and demonstrates a lack of credibility in its assurances of future compliance. *See, e.g., Eagletech Communications, Inc.*, Securities Exchange Act of 1934 Rel. No. 54095, 2006 SEC LEXIS 1534, at *12-13 (July 5, 2006) (“[Respondent] has claimed that criminal conduct by others has caused [respondent’s] failure to file. This further demonstrates that [respondent] does not appreciate the wrongful nature of its conduct. Nor does [respondent] accept responsibility for its failure to meet its filing obligations. The likelihood of future violations is quite high.”); *iBiz Technology Corp.*, Initial Decision Rel. No. 312, 2006 SEC LEXIS 1406, at *9 (June 16, 2006) (“iBiz has not offered credible assurances

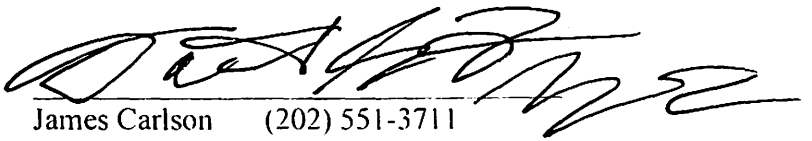
against further violations or accepted responsibility for failing to meet its reporting obligations.”). Accordingly, even if Monetiva’s excuses have a basis in fact, such circumstances do not represent a valid legal reason for preventing revocation.

II. Conclusion

For the reasons set forth above, and in its initial motion, the Division respectfully requests that the Commission grant the Division’s motion for judgment on the pleadings and revoke the registration of each class of Monetiva’s securities registered under Exchange Act Section 12.

Dated: September 27, 2019

Respectfully submitted,

for 

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COUNSEL FOR
DIVISION OF ENFORCEMENT

CERTIFICATE OF SERVICE

I hereby certify that true copies of the Division of Enforcement's Motion for Ruling on the Pleadings Against Monetiva, Inc. and Brief in Support were served on the following on this 27th day of September, 2019, in the manner indicated below:

By Hand:

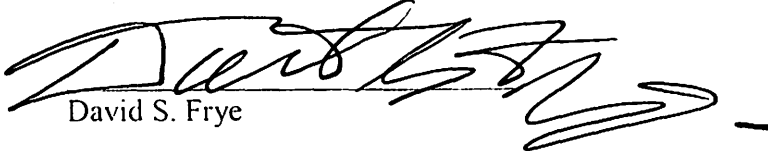
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