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8
9 BEFORE THE DEPARTMENT OF BUSINESS OVERSIGHT
10 OF THE STATE OF CALIFORNIA

11 In the Matter of THE COMMISSIONER OF)
12 BUSINESS OVERSIGHT OF THE STATE OF)
13 CALIFORNIA,)
14 Complainant,)
15 vs.)
16 GLOBAL VICTORY CAPITAL)
17 INVESTMENT GROUP, a.k.a. GLOBAL)
18 VICTORY CAPITAL GROUP; PHASE 7)
19 MEDIA GROUP, INC.; WILLIS VICTORY,)
20 a.k.a. WILLIS GEORGE VICTUM, WILLIS)
VICTIM, WILLIS G. VICTORY, and WILLIS)
GEORGE VICTORY; and ANGELICA GO,)
21 a.k.a. FRAY ANGELICA GO,)
Respondents.)

STATEMENT IN SUPPORT OF ORDER
LEVYING ADMINISTRATIVE PENALTIES
PURSUANT TO CORPORATIONS CODE
SECTION 25252

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24 Jan Lynn Owen, the Commissioner of Business Oversight ("Commissioner"), brings this
25 action in the public interest and alleges and charges as follows:

26 I.
27 STATEMENT OF FACTS
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1 1. At all relevant times, Global Victory Capital Investment Group, a.k.a. Global Victory
2 Capital Group (“Global”) is a business entity of unknown formation, with a primary place of business
3 located at 14123 Via Corsini, San Diego, CA 92128. Global transacts business by way of email at
4 info@globalvictorycapital.com or victory@globalvictorycapital.com, on the internet at
5 www.globalvictorycapital.com, by telephone at (951) 304-3493 or (858) 568-1693, and by facsimile
6 at (866) 528-8807.

7 2. At all relevant times, Phase 7 Media Group, Inc. (“Phase”) is a corporation with a
8 primary place of business located at 13815 Via Rimini, San Diego, CA 92129. Phase transacts
9 business by way of email at victory@phase7media.com.

10 3. At all relevant times, Willis Victory, a.k.a. Willis George Victum, Willis Victim,
11 Willis G. Victory, and Willis George Victory (“Victory”) is the chief executive officer, director, and
12 representative of Global. Victory is also a representative or director of Phase, with a business address
13 of 14123 Via Corsini, San Diego, CA 92128 or 13815 Via Rimini, San Diego, CA 92129. Victory
14 transacts business by way of email at victory@globalvictorycapital.com and
15 victory@phase7media.com, by telephone at (951) 304-3493 or (858) 568-1693, and by facsimile at
16 (866) 528-8807.

17 4. At all relevant times, Angelica Go, a.k.a. Fray Angelica Go (“Go”) is an individual
18 doing business as the corporate secretary and a representative of Global, with a business address
19 located at either 38358 Tranquila Ave., Murrieta, CA 92563 or 13815 Via Rimini, San Diego, CA
20 92129. Go is also a representative of Phase.

21 5. Global, Phase, Victory, and Go are herein collectively referred to as “Respondents.”
22 Whenever reference is made herein to “Respondents” doing any act, the allegation shall mean the act
23 of each respondent acting individually, jointly and severally.

24 6. Beginning on June 14, 2012, Respondents offered and sold investment agreements to
25 at least one (1) investor, Investor M.A. residing in Sacramento, Sacramento County. The terms of the
26 investment are as follows: Investor M.A. pays to Respondents a capital investment amount of twenty
27 thousand dollars (\$20,000) for the purpose of investing in Global and other related business
28 enterprises in exchange for a profit on the capital invested. After the first forty five (45) days of the
investment, investor M.A. is to receive in return from Respondents, the entire principal capital

1 investment of twenty thousand dollars (\$20,000), and an additional forty thousand dollars (\$40,000)
2 as two hundred percent (200%) interest profit on the capital investment for a total of sixty thousand
3 dollars (\$60,000). Respondents refer to this first phase of investment as the “first tranche”. The
4 second phase or “second tranche” of the investment consists of investor M.A. reinvesting the sixty
5 thousand dollars (\$60,000) from the “first tranche” for an additional forty five (45) days, yielding a
6 total of principal and profit of one hundred and fifty thousand dollars (\$150,000). The third and final
7 phase of the investment of “third tranche” is a reinvestment of one hundred and fifty thousand dollars
8 (\$150,000) previously invested for an additional forty five (45) days, yielding a total of principal and
9 profit of an unknown amount. At all times during the investment, Respondents guarantee the return of
investor M.A.’s initial twenty thousand dollar (\$20,000) principal investment.

10 7. In or about August 2012, investor M.A. wired an additional three thousand dollars
11 (\$3,000) to Respondents, by way of Respondents’ associate located out of state. Respondents
12 required that investor M.A. pay this amount to “facilitate the investment process”. Investor M.A. paid
13 to Respondents a total of twenty three thousand dollars (\$23,000) for the purpose of investing.

14 8. Beginning in 2012, Respondents offered and sold the above described securities in
15 California in issuer transactions. The Department of Business Oversight has not issued a permit or
16 other form of qualification authorizing any person to offer and sell these securities in the form of
17 investment agreements in California.

18 9. Beginning in 2012, in connection with the offer and sale of these securities,
19 Respondents made, or caused to be made, misrepresentations of material fact or omitted to state
20 material facts necessary in order to make the statements made, in the light of the circumstances under
21 which they were made, not misleading.

22 10. Specifically, Respondents misrepresented to investor M.A. that investor M.A. would
23 receive a profitable return on investor M.A.’s investment, and would, at the minimum, receive the
24 principal amount invested at the termination of the investment. Investor M.A.’s principal amount
25 invested was twenty three thousand dollars (\$23,000) tendered to Respondents on June 14, 2012 and
26 in August, 2012. To date, investor M.A. has not received investor M.A.’s principal amount, despite
27 repeatedly requesting the amount to be returned.

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1 11. Corporations Code section 25110 prohibits the offering and/or selling securities that
2 are not qualified by the Department or exempt.

3 12. Corporations Code section 25401 prohibits the offer and/or sale of securities in
4 California by means of written or oral communications that include untrue statements of material fact
5 or omits material facts necessary in order to make the statements made, in the light of the
6 circumstances under which they were made, not misleading.

7 **II.**

8 **ORDER LEVYING ADMINISTRATIVE PENALTIES**

9 **(For violations of Corporations Code sections 25110 and 25401)**

10 13. The Commissioner re-alleges and reincorporates by reference paragraphs 1-12 of this
11 Statement in Support as though fully set forth herein.

12 14. Corporations Code section 25252 authorizes the Commissioner to issue an order
13 levying administrative penalties against any person for willful violations of any provision of the
14 Corporate Securities Law of 1968 and any rules promulgated thereunder. Specifically, Corporations
15 Code section 25252 provides, in relevant part:

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17 The commissioner may, after appropriate notice and opportunity for hearing,
18 by orders, levy administrative penalties as follows:

19 (a) Any person subject to this division, other than a broker-dealer or
20 investment adviser, who willfully violates any provision of this division, or
21 who willfully violates any rule or order adopted or issued pursuant to this
22 division, is liable for administrative penalties of not more than one thousand
dollars (\$1,000) for the first violation, and not more than two thousand five
hundred dollars (\$2,500) for each subsequent violation.

23 15. Based on the foregoing findings of fact, as set forth fully above in paragraphs 1-14,
24 Respondents willfully violated Corporations Code section 25110 by offering and/or selling securities
25 that are not qualified by the Department or exempt. Respondents also willfully violated Corporations
26 Code section 25401 by making untrue statements or omissions in association with the offer and sale
27 of investment agreements in California.

1 **WHEREFORE**, good cause showing, and pursuant to Corporations Code section 25252, the
2 Commissioner prays for an order levying administrative penalties against Respondents Global, Phase,
3 Victory, and Go, jointly and severally, as follows:

4 That pursuant to Corporations Code section 25252, the Commissioner levy administrative
5 penalties of one thousand dollars (\$1,000.00) for the first violation of Corporations Code section
6 25401 and two thousand five hundred dollars (\$2,500.00) for each subsequent violation,

7 (a) First violation: \$1,000.00 for one (1) violation of California Corporations
8 Code section 25110 as follows: Beginning in 2012, Respondents offered and sold the above
9 described securities in California in issuer transactions. The Department of Business Oversight has
10 not issued a permit or other form of qualification authorizing any person to offer and sell these
11 securities in the form of investment agreements in California;

12 (b) Second violation: \$2,500.00 for one (1) violation of California Corporations
13 Code section 25401 as follows: Beginning in 2012, Respondents misrepresented to investor M.A.
14 that investor M.A. would receive a profitable return on investor M.A.'s investment. To, date
15 investor M.A. has not received a profitable return on investor M.A.'s investment from
16 Respondents; and

17 (c) Third violation: \$2,500.00 for a second violation of California Corporations
18 Code section 25401, as follows: Beginning in 2012, Respondents misrepresented to investor M.A.
19 that investor M.A. would, at the minimum, receive the principal amount invested at the termination
20 of the investment. Investor M.A.'s principal amount invested was twenty three thousand dollars
21 (\$23,000) tendered to Respondents on June 14, 2012 and in August, 2012. To date, investor M.A.
22 has not received investor M.A.'s principal amount, despite repeatedly requesting that the amount to
23 be returned.

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The total amount of administrative penalties for Respondents' violations of Corporations Code sections 25110 and 25401 is six thousand dollars (\$6,000.00). These administrative penalties are necessary in the public interest for the protection of consumers and are consistent with the purposes, policies, and provisions of the Corporate Securities Law of 1968.

Dated: December 3, 2015
Sacramento, California

JAN LYNN OWEN
Commissioner of Business Oversight

By _____
MARISA I. URTEAGA-WATKINS
Counsel
Enforcement Division