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

12 In the Matter of: )

13 THE COMMISSIONER OF BUSINESS )  
14 OVERSIGHT, )

15 Complainant, )

16 v. )

17 GLOBAL VICTORY CAPITAL )  
18 INVESTMENT GROUP, a.k.a. GLOBAL )  
19 VICTORY CAPITAL GROUP; PHASE 7 )  
20 MEDIA GROUP, INC.; WILLIS VICTORY, )  
21 a.k.a. WILLIS GEORGE VICTUM, WILLIS )  
22 VICTIM, WILLIS G. VICTORY, and WILLIS )  
23 GEORGE VICTORY; and ANGELICA GO, )  
24 a.k.a. FRAY ANGELICA GO, )

23 Respondents. )

STIPULATION TO DESIST AND REFRAIN ORDER

25  
26 Global Victory Capital Investment Group a.k.a. Global Victory Capital Group; Phase 7 Media  
27 Group, Inc.; Willis Victory, a.k.a. Willis George Victum, Willis Victim, Willis G. Victory, and Willis  
28 George Victory (hereinafter collectively, Consenting Respondents) and Complainant, the

1 Commissioner of Business Oversight (Commissioner) (hereafter, the Parties), enter into this  
2 Stipulation based on the following facts:

3 RECITALS

4 A. At all relevant times, Global Victory Capital Investment Group, a.k.a. Global Victory  
5 Capital Group (hereinafter, Global) was a business entity of unknown formation, with a primary  
6 place of business located at 14123 Via Corsini, San Diego, California, 92128. Willis Victory, also  
7 known as Willis George Victum, Willis Victim, Willis G. Victory, and Willis George Victory, was  
8 the chief executive officer, director, and representative of Global.

9 B. At all relevant times, Phase 7 Media Group, Inc. was a California corporation with a  
10 primary place of business located at 13815 Via Rimini, San Diego, California, 92129.

11 C. The Commissioner is authorized to administer and enforce the provisions of the  
12 Corporate Securities Law of 1968 (CSL) (Corp. Code, § 25000 et seq.) and the rules promulgated  
13 thereunder (Cal. Code Regs., tit. 10, § 260.000 et seq.) which include the offer and sale of securities.

14 D. On December 3, 2015, the Commissioner issued a Desist and Refrain Order and Order  
15 for Ancillary Relief (Desist and Refrain Order) and Notice of Intention to Issue Order Levying  
16 Administrative Penalties Pursuant to Corporations Code Section 25252 (Notice of Intention)  
17 (collectively, Actions) against Consenting Respondents and respondent Angelica Go, a.k.a. Fray  
18 Angelica Go (hereinafter, Respondent Go) (hereinafter collectively, Respondents).

19 E. The Actions were issued as a result of the Commissioner finding the Respondents  
20 made material misrepresentations in the offer and sale of unqualified securities in violation of  
21 sections 25110 and 25401 of the CSL.<sup>1</sup> Consenting Respondents requested a hearing to challenge the  
22 Actions. Respondent Go did not request a hearing, and the Actions are final as to Respondent Go by  
23 operation of law.

24 NOW, THEREFORE, for good and valuable consideration, and the terms and conditions set  
25 forth herein, the Parties agree as follows:

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TERMS AND CONDITIONS

1  
2 1. Purpose.

3 The purpose of this Stipulation is to resolve the Actions as to the Consenting Respondents in  
4 a manner that avoids the expense of a hearing and possible further court proceedings on those  
5 issues.

6 2. Jurisdiction.

7 Consenting Respondents stipulate to the jurisdiction of the Commissioner over them and to  
8 her authority under Corporations Code section 25252 to issue the Desist and Refrain Order  
9 previously issued to them on December 3, 2015, which is attached hereto as Exhibit A.

10 3. Amended Desist and Refrain Order.

11 It is hereby stipulated by Consenting Respondents that the Desist and Refrain Order attached  
12 as Exhibit A is deemed a final and enforceable order as to Consenting Respondents, with exception  
13 to section II entitled "Order for Ancillary Relief" which will no longer apply to Consenting  
14 Respondents. Nothing in this Stipulation modifies the terms of the Desist and Refrain Order or  
15 relief sought or ordered in the Actions against Respondent Go.

16 4. Notice of Intention to Levy Penalties.

17 The Commissioner hereby withdraws her Notice of Intention as to Consenting Respondents  
18 for the conduct described in the Actions. The Notice of Intention is final and remains in full force  
19 and effect as to Respondent Go.

20 5. Waiver of Hearing Rights.

21 Consenting Respondents have read this Stipulation and the Desist and Refrain Order,  
22 attached as Exhibit A, are aware of their rights to a hearing and appeal in this matter, and elect to  
23 permanently waive any right to, a hearing and appeal, including those rights under Corporations  
24 Code sections 25232, 25232.1 and 25233, and to judicial review of pursuant to Code of Civil  
25 Procedure section 1094.5 with respect to the issuance of this Stipulation or the Desist and Refrain  
26 Order.

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28 <sup>1</sup> Unless otherwise indicated, all statutes refer to the Corporations Code.

1 4. Future Actions by the Commissioner.

2 This Stipulation shall not serve to exculpate Consenting Respondents or any of its partners,  
3 owners, officers, directors, shareholders, employees, or successors from any administrative, civil or  
4 criminal liability for any past or future violations of the CSL in actions brought by other agencies or  
5 private parties.

6 5. Independent Legal Advice.

7 Each party represents, warrants, and agrees that it has received independent advice from its  
8 attorney(s) and/or representatives with respect to the advisability of executing this Stipulation.

9 6. Counterparts.

10 The parties agree that this Stipulation may be executed in one or more separate counterparts,  
11 each of which when so executed, shall be deemed an original. Such counterparts shall together  
12 constitute and be one and the same instrument.

13 7. Waiver, Modification, and Qualified Integration.

14 The waiver of any provision of this Stipulation shall not operate to waive any other  
15 provision set forth herein. No waiver, amendment, or modification of this Stipulation shall be valid  
16 or binding to any extent unless it is in writing and signed by all of the parties affected by it.

17 8. Headings and Governing Law.

18 The headings to the paragraphs of this Stipulation are inserted for convenience only and will  
19 not be deemed a part hereof or affect the construction or interpretation of the provisions hereof.  
20 This Stipulation shall be construed and enforced in accordance with and governed by California  
21 law.

22 9. Full Integration.

23 Each party represents, warrants, and agrees that in executing this Stipulation it has relied  
24 solely on the statements set forth herein and the advice of its own counsel. Each of the parties  
25 further represents, warrants, and agrees that in executing this Stipulation it has placed no reliance on  
26 any statement, representation, or promise of any other party, or any other person or entity not  
27 expressly set forth herein, or upon the failure of any party or any other person or entity to make any  
28 statement, representation or disclosure of anything whatsoever. The parties have included this

1 clause to preclude any claim that any party was in any way fraudulently induced to execute this  
2 Stipulation, and preclude the introduction of parole evidence to vary, interpret, supplement, or  
3 contradict the terms of this Stipulation.

4 10. Presumption from Drafting.

5 In that the parties have had the opportunity to draft, review and edit the language of this  
6 Stipulation, no presumption for or against any party arising out of drafting all or any part of this  
7 Stipulation will be applied in any action relating to, connected to, or involving this Stipulation.  
8 Accordingly, the parties waive the benefit of Civil Code section 1654 and any successor or  
9 amended statute, providing that in cases of uncertainty, language of a contract should be interpreted  
10 most strongly against the party who caused the uncertainty to exist.

11 11. Voluntary Agreement.

12 Consenting Respondents enter into this Stipulation voluntarily and without coercion and  
13 acknowledge that no promises, threats or assurances have been made by the Commissioner or any  
14 officer, or agent thereof, about this Stipulation.

15 12. Public Record.

16 Consenting Respondents acknowledge that this Stipulation is a public record.

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1 13. Authority to Execute.

2 Each signatory hereto covenants that he or she possesses all necessary capacity and authority  
3 to sign and enter into this Stipulation.

4  
5 Dated: 06/09/17

JAN LYNN OWEN  
Commissioner of Business Oversight

6  
7 By \_\_\_\_\_  
8 MARY ANN SMITH  
9 Deputy Commissioner  
Enforcement Division

10 Dated: 06/09/17

WILLIS VICTORY as an individual  
and on behalf of GLOBAL VICTORY CAPITAL  
INVESTMENT GROUP, a.k.a. GLOBAL VICTORY  
CAPITAL GROUP; and PHASE 7 MEDIA GROUP, INC.

14 By \_\_\_\_\_  
15 WILLIS VICTORY

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EXHIBIT A

1 MARY ANN SMITH  
Deputy Commissioner  
2 DOUGLAS M. GOODING  
Assistant Chief Counsel  
3 MARISA I. URTEAGA-WATKINS (State Bar No. 236398)  
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Attorneys for Complainant

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

11 In the Matter of THE COMMISSIONER OF )  
12 BUSINESS OVERSIGHT OF THE STATE OF ) DESIST AND REFRAIN ORDER AND  
13 CALIFORNIA, ) ORDER FOR ANCILLARY RELIEF  
14 Complainant, ) (Violations of Corporations Code sections  
15 vs. ) 25110 and 25401)  
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 )  
21 GEORGE VICTORY; and ANGELICA GO, )  
a.k.a. FRAY ANGELICA GO, )  
Respondents. )

22  
23 The Commissioner of Business Oversight finds that:

24 I.  
25 STATEMENT OF FACTS  
26

27 1. At all relevant times, Global Victory Capital Investment Group, a.k.a. Global Victory  
28 Capital Group (“Global”) is a business entity of unknown formation, with a primary place of business

1 located at 14123 Via Corsini, San Diego, CA 92128. Global transacts business by way of email at  
2 info@globalvictorycapital.com or victory@globalvictorycapital.com, on the internet at  
3 www.globalvictorycapital.com, by telephone at (951) 304-3493 or (858) 568-1693, and by facsimile  
4 at (866) 528-8807.

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

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

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

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

22 6. Beginning on June 14, 2012, Respondents offered and sold investment agreements to  
23 at least one (1) investor, Investor M.A. residing in Sacramento, Sacramento County. The terms of the  
24 investment are as follows: Investor M.A. pays to Respondents a capital investment amount of twenty  
25 thousand dollars (\$20,000) for the purpose of investing in Global and other related business  
26 enterprises in exchange for a profit on the capital invested. After the first forty five (45) days of the  
27 investment, investor M.A. is to receive in return from Respondents, the entire principal capital  
28 investment of twenty thousand dollars (\$20,000), and an additional forty thousand dollars (\$40,000)  
as two hundred percent (200%) interest profit on the capital investment for a total of sixty thousand

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

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

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

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

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

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



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2 **III.**3 **DESIST AND REFRAIN ORDER**

4 The Commissioner of Business Oversight is of the opinion that the investment agreements  
5 sold by Global Victory Capital Investment Group, a.k.a. Global Victory Capital Group, Phase 7  
6 Media Group, Inc., Willis Victory, a.k.a. Willis George Victum, Willis Victim, Willis G. Victory, and  
7 Willis George Victory, and Angelica Go, a.k.a. Fray Angelica Go are securities subject to  
8 qualification pursuant to the Corporate Securities Law of 1968. These securities were offered and  
9 sold without being qualified or exempt, in violation of Corporations Code section 25110.

10 The Commissioner of Business Oversight is also of the opinion that the securities in the form  
11 of investment agreements, were offered or sold in California by means of a written or oral  
12 communication which included an untrue statement of material fact or omitted to a state material fact  
13 necessary to make the statement made, in the light of the circumstances under which they were made,  
14 not misleading, in violation of Corporations Code section 25401 of the Corporate Securities Law of  
15 1968.

16 **IT IS HEREBY ORDERED EFFECTIVE IMMEDIATELY THAT:**

17 Pursuant to Corporations Code section 25532, Global Victory Capital Investment Group,  
18 a.k.a. Global Victory Capital Group, Phase 7 Media Group, Inc., Willis Victory, a.k.a. Willis  
19 George Victum, Willis Victim, Willis G. Victory, and Willis George Victory, and Angelica Go,  
20 a.k.a. Fray Angelica Go are hereby ordered to desist and refrain from the further offer or sale in  
21 California of securities in the form of investment agreements, unless and until qualification has  
22 been made under said law or unless exempt.

23 **IT IS ALSO HEREBY ORDERED EFFECTIVE IMMEDIATELY THAT:**

24 Pursuant to Corporations Code section 25532 of the Corporate Securities Law of 1968,  
25 Global Victory Capital Investment Group, a.k.a. Global Victory Capital Group, Phase 7 Media  
26 Group, Inc., Willis Victory, a.k.a. Willis George Victum, Willis Victim, Willis G. Victory, and  
27 Willis George Victory, and Angelica Go, a.k.a. Fray Angelica Go are also hereby ordered to  
28 desist and refrain from offering or selling or buying or offering to buy any security in California,

1 including but not limited to investment agreements, by means of any written or oral  
2 communication which includes an untrue statement of material fact or omits to state a material  
3 fact necessary in order to make the statements made, in the light of circumstances under which  
4 they were made, not misleading.

5         This Order is necessary, in the public interest, for the protection of investors and consistent  
6 with the purposes, policies, and provisions of the Corporate Securities Law of 1968. This Order shall  
7 remain in full force and effect until further order of the Commissioner.

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10 Dated: December 3, 2015  
11 Sacramento, California

JAN LYNN OWEN  
Commissioner of Business Oversight

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By \_\_\_\_\_

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MARY ANN SMITH  
Deputy Commissioner  
Enforcement Division

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