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**STATE OF CALIFORNIA**  
**BUSINESS, TRANSPORTATION AND HOUSING AGENCY**  
**DEPARTMENT OF CORPORATIONS**

**TO:** Zarghona Ramish  
37517 Summer Holly Common  
Fremont, CA 94536

Farzana Ghias  
2015 Spirit Way  
San Leandro, CA 94579

Rega Farzana  
5629 Cello Way  
Fremont, CA 94538

Shala Tamiz  
220 Yerba Buena Place  
Fremont, CA 94536

Nadia Abawi  
809 Clifford Drive  
Lathrop, CA 95330

Shakiba Aziz  
4022 Polonius Circle  
Fremont, CA 94555

**DESIST AND REFRAIN ORDER**  
**(For violations of sections 25110 and 25401 of the Corporations Code)**

The California Corporations Commissioner finds that:

1. Zarghona Ramish is an individual who currently resides at 37517 Summer Holly Common, Fremont, California, 94536.

- 1 2. Farzana Ghias is an individual who currently resides at 2015 Spirit Way, San Leandro,  
2 California, 94579.
- 3
- 4 3. Rega Farzana is an individual who currently resides at 5629 Cello Way, Fremont,  
5 California, 94538.
- 6
- 7 4. Shala Tamiz is an individual who currently resides at 220 Yerba Buena Place, Fremont,  
8 California, 94536.
- 9
- 10 5. Nadia Abawi is an individual who currently resides at 809 Clifford Drive, Lathrop,  
11 California, 95330.
- 12
- 13 6. Shakiba Aziz is an individual who currently resides at 4022 Polonius Circle, Fremont,  
14 California, 94555.
- 15
- 16 7. During 2001, 2002, and 2003, Ramish, Ghias, Farzana, Tamiz, Abawi, and Aziz were  
17 active participants in an organization operating under the name of Women Helping  
18 Women (WHW), Women Empowering Women (WEW), Women Helping Women Dinner  
19 Party (DP), or The Women’s Garden Party or Garden Circle (WGP).
- 20
- 21 8. WHW, WEW, DP, and WGP operated as a pyramid scheme.
- 22
- 23 9. Women in these groups operated by inviting women to a “potluck” gathering at  
24 individual’s homes and/or community centers or conference rooms. The gathering was  
25 described as a “support group.” During the gatherings, women would be recruited to  
26 contribute money to the group.
- 27
- 28

- 1 10. New members to the group contributed an amount from \$625 (1/8 a share) to \$5,000 (1  
2 full share) to join at the lowest level, then moved up level by level by bringing in new  
3 contributors until, theoretically, they reached the top of the pyramid and received a payoff,  
4 called a “birthday,” of as much as \$40,000. The DP group used metaphors for the levels  
5 such as “appetizer,” “soup and salad,” and “entrée.” The WGP used metaphors for the  
6 levels such as “bud,” “bloom,” and “bouquet.”  
7
- 8 11. Members moved through the levels by recruiting new members for the lower levels. It  
9 appeared often that the promoters of these groups committed fraud in order to secure  
10 payoffs regularly for themselves instead of the women going through the levels.  
11
- 12 12. New members of these groups were told that the scheme is a charitable activity to help  
13 women in need and that the “gifts” of up to \$5,000 each did not need to be reported to the  
14 Internal Revenue System.  
15
- 16 13. These groups kept charts of the pyramid and who had given what amount and assigned  
17 women to be “monitors” of the charts to keep track of who was in line for a “birthday.”  
18 Women were encouraged, if not directed, not to use their full name, but only their first  
19 name and last initial on the charts. They were often encouraged to make up a name for use  
20 on these charts.  
21
- 22 14. Initially, women who first joined these groups were able to find recruits with promises of  
23 large returns for small amounts invested. New recruits would come to a meeting where a  
24 member would have a “birthday” and receive up to \$40,000 cash. New recruits filled the  
25 charts creating pyramids that allowed many women to be paid “birthday” prizes.  
26  
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- 1 15. Eventually, however, mathematic reality occurred and the newer members ran out of  
2 women to recruit. At this point, the pyramid scheme collapsed and all the women on the  
3 bottom of the pyramid lost their investment in the scheme.  
4
- 5 16. During 2002 and 2003, a large, but unknown number of women fell victim to the pyramid  
6 scheme of WHW, WEW, DP, and WGP and lost anywhere from hundreds to tens of  
7 thousands of dollars each.  
8
- 9 17. Ramish, Ghias, Farzana, Tamiz, Abawi, and Aziz all actively participated in leadership  
10 roles in Alameda County groups entitled WHW, WEW, DP, or WGP. Each of the named  
11 individuals also received “birthday” gifting from the scheme.  
12
- 13 18. Ramish, Ghias, Farzana, Tamiz, Abawi, and Aziz each actively participated in giving  
14 women (new recruits) information at meetings and through e-mail that included the  
15 following facts: the group was not a pyramid scheme; the group was a “charitable  
16 organization;” women joined not expecting to make money; and the amount “gifted” or  
17 given to the group was not an “investment.” At the time of these statements, each of the  
18 individuals named did in fact know that the group was paying women for their “birthday”  
19 with money coming from new recruits, thus the investment scheme did operate as a  
20 pyramid scheme. Each of the individuals named also had joined and were members of the  
21 group in order to make money and brought in new recruits with the advertisement of  
22 making eight times the amount invested.  
23
- 24 19. Pursuant to state law and federal case law, pyramid schemes are securities and are  
25 inherently fraudulent.  
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- 27 20. Neither Ramish, Ghias, Farzana, Tamiz, Abawi, nor Aziz is licensed or authorized to sell  
28 securities in California.

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Based upon the foregoing findings, the California Corporations Commissioner is of the opinion that investments in WHW, WEW, DP, or WGP were securities in the form of investment contracts that were being offered by inter alia, Zarghona Ramish, Farzana Ghias, Rega Farzana, Shala Tamiz, Nadia Abawi, and Shakiba Aziz in issuer transactions in California without the sales having been qualified, in violation of Corporations Code section 25110.

In addition, the Commissioner is of the opinion that the securities were being offered by inter alia, Zarghona Ramish, Farzana Ghias, Rega Farzana, Shala Tamiz, Nadia Abawi, and Shakiba Aziz by means of verbal and written communications that included untrue statements of material fact and omissions of material facts in violation of Corporations Code section 25401.

Therefore, pursuant to Section 25532 of the Corporate Securities Law of 1968, Zarghona Ramish, Farzana Ghias, Rega Farzana, Shala Tamiz, Nadia Abawi, and Shakiba Aziz are hereby ordered to desist and refrain from the further offer or sale in the State of California of securities in the form of an investment contract unless and until qualification has been made under the California Securities Law of 1968. Zarghona Ramish, Farzana Ghias, Rega Farzana, Shala Tamiz, Nadia Abawi, and Shakiba Aziz are also ordered to desist and refrain from offering or selling or buying any security in the State of California by means of any written or oral communication which includes an untrue statement of a material fact or omits to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading.

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1 The Commissioner is of the opinion that This Order is necessary, in the public interest, for the  
2 protection of investors and consistent with the purposes, policies, and provisions of the Corporate  
3 Securities Law of 1968.

4  
5 Dated: December 9, 2004  
6 Sacramento, California

7 WILLIAM P. WOOD  
8 California Corporations Commissioner

9  
10 By \_\_\_\_\_  
11 VIRGINIA JO DUNLAP  
12 Deputy Commissioner  
13 Enforcement and Legal Services  
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