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**STATE OF CALIFORNIA**  
**BUSINESS, CONSUMER SERVICES, AND HOUSING AGENCY**  
**DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION**

TO: Tongi Tupe LLC  
PATOA  
American Tonga Global Diaspora PTOA  
Ptoa Global Movement for the Poor  
Tilila Siola’a Walker-Sumchai  
6006 North El Dorado Street  
Stockton, California 95209

**DESIST AND REFRAIN ORDER**

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

The Commissioner of Financial Protection and Innovation (Commissioner) finds that:

1. The Commissioner is authorized to pursue administrative actions and remedies against persons who engage in violations of the Corporate Securities Law of 1968 (Corporations Code § 25000 et seq.).

2. At all relevant times, Tilila Siola’a Walker-Sumchai (Walker-Sumchai) was an individual residing in California with a principal place of business at 6006 North El Dorado Street, Stockton, California 95209. Walker-Sumchai is a principal of at least four related entities used to conduct activities subject to the Corporate Securities Law of 1968, acting as Chief Executive Officer of Tongi Tupe LLC, Chief Executive Officer of PATOA, Chief Executive Officer of American Tonga Global Diaspora PTOA, and a principal of Ptoa Global Movement for the Poor (collectively, the Walker-Sumchai Entities).

3. At all relevant times, Tongi Tupe LLC (Tongi Tupe) was a California limited liability company with a principal place of business at 6006 North El Dorado Street, Stockton, California 95209. Per its statement of information filed with the Secretary of State, the corporation’s type of business is an investment club.

4. At all relevant times, PATOA was a California general stock corporation with a principal place of business at 6006 North El Dorado Street, Stockton, California 95209. Per its statement of

1 information filed with the Secretary of State, the corporation purports to be a “Humanitarian org  
2 serving Tonga residents [sic].” PATOA has never been registered as a tax-exempt charity or  
3 nonprofit organization with the California Franchise Tax Board or the Internal Revenue Service.

4 5. At all relevant times, American Tonga Global Diaspora PTOA (American Tonga)  
5 purported to be a charitable entity with a principal place of business at 6006 North El Dorado Street,  
6 Stockton, California 95209. There is no record of any corporate filings for an entity named American  
7 Tonga Global Diaspora PTOA. In investor presentations, Walker-Sumchai described herself as Chief  
8 Executive Officer of this entity.

9 6. At all relevant times, Ptoa Global Movement for the Poor (Global Movement) purported  
10 to be a charitable entity operating in the State of California. There is no record of any corporate  
11 filings for an entity named Ptoa Global Movement for the Poor. Global Movement has no known  
12 principal place of business.

13 7. At all relevant times, Global Movement maintained a public Facebook group named  
14 “PTOA Global Movement for the Poor,” at <https://www.facebook.com/groups/2086855388225304/>.  
15 PTOA is a Tongan-language acronym for the Democratic Movement of the Friendly Islands (“Paati  
16 Temokalati ‘a e ‘Otu Motu ‘Anga‘ofa”), a political party in the country of Tonga. There is no record  
17 indicating that the Global Movement is formally affiliated with the political party. Walker-Sumchai is  
18 an administrator of the Global Movement’s Facebook group and uses it to solicit investments.

19 8. Beginning in at least approximately March 2021, Walker-Sumchai began to solicit  
20 investments in the form of an investment contract that she called a “Tupe” from members of the  
21 Tongan diaspora community residing in California.<sup>1</sup> Walker-Sumchai promoted the Tongi Tupe  
22 investment through streaming video presentations and through “chapters” of American Tonga and  
23 Global Movement organized in multiple locations across California and elsewhere. Walker-Sumchai  
24 recruited the chapters’ leaders and encouraged these leaders to invest in the Tupes.  
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28 <sup>1</sup> In the Tongan language “Tupe” approximately translates as the English word “share.”

1           9. Through these promotional channels, Walker-Sumchai claimed that investor funds would  
2 be used in an enterprise she operated and referred to as “Tongi Tupe” and the “Tilila System.”  
3 Walker-Sumchai described this system to investors as a “geometry algorithm formula” relating to  
4 Native American tribal casinos. Investors were promised weekly payouts at high rates of return on a  
5 fixed schedule. Different schedules and rates of return were promised at different times.

6           10. As part of the scheme, Walker-Sumchai, directly and through her agents or  
7 representatives, offered another “Tupe” investment contract purportedly connected to a housing  
8 development project located in or near Lodi, California. Under this investment offering, investors  
9 were promised both weekly payments at high rates of return and an opportunity to receive a newly  
10 built home. To date, no investor has received a home. There is no record showing that any investor  
11 funds were applied to a real estate development project.

12           11. In a video addressing investors’ complaints about not receiving payouts, Walker-Sumchai  
13 provided the following explanation of her system:

14                   The first week there is one investor. The second week two. Every week  
15                   the investors double from week one to week twelve.

16                   [...]

17                   The structural effort goal [sic] was to reach twenty weeks with each week  
18                   doubling the amount of people investing in Tongi Tupe. If that goal had  
19                   been reached, everyone should have been paid, but people stopped  
20                   investing at week ten so Tongi Tupe had to stop. If everything doubles  
21                   with people continuing to buy in to Tongi Tupe, then the total amount  
22                   would be in the millions.  
23

24 Throughout this presentation, Walker-Sumchai relied on a hand-drawn “V”-shaped sketch as a visual  
25 representation of the scheme.

26           12. The foregoing securities were offered and sold in this state in issuer transactions. The  
27 Department of Financial Protection and Innovation has not issued a permit or other form of  
28 qualification authorizing any person or entity to offer and sell these securities in this state.

1           13. Walker-Sumchai and the Walker-Sumchai Entities offered and sold securities in this state  
2 by means of written and oral communications which included untrue statements of material fact and  
3 omitted to state material facts necessary in order to make the statements made, in light of the  
4 circumstances under which they were made, not misleading. The misrepresentations and omissions of  
5 material fact include, but are not limited to:

- 6           a) Walker-Sumchai had a “license” or a “permit” to offer securities to the public or  
7           make investments on behalf of investors. In fact, no permit or qualification to offer  
8           and sell securities has been issued. Neither Walker-Sumchai nor the Walker-  
9           Sumchai Entities were authorized to act as broker-dealers or investment advisers.
- 10          b) Walker-Sumchai would invest funds received using her formula. In fact, the  
11          scheme only redistributed new investor funds as payments to early investors.
- 12          c) Investors who bought shares in a Tupe would receive high returns on investment  
13          on a weekly schedule for multiple weeks. In fact, most investors received nothing.
- 14          d) Investment proceeds would fund a housing development located in or near Lodi,  
15          California. In fact, there is no record of any funds going towards any such project.
- 16          e) Investors in the Tupe involving a Lodi, California, housing development project  
17          would receive new homes. In fact, no investor received any form of real property.

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19           Based on the foregoing findings, the Commissioner is of the opinion that Tilila Siola’s  
20 Walker-Sumchai, Tongi Tupe LLC, PATOA, American Tonga Global Diaspora PTOA, and Ptoa  
21 Global Movement for the Poor have engaged in the offer and sale of securities in the form of  
22 investment contracts. These securities have not been qualified under the Corporate Securities Law of  
23 1968, in violation of Corporations Code § 25110.

24           Pursuant to Corporations Code § 25532, Tilila Siola’s Walker-Sumchai, Tongi Tupe LLC,  
25 PATOA, American Tonga Global Diaspora PTOA, and Ptoa Global Movement for the Poor are  
26 hereby ordered to desist and refrain from the further offer or sale of securities in the State of  
27 California, including but not limited to investment contracts, unless and until qualification has been  
28 made under said law or unless exempt.

1 In addition, based on the foregoing findings, the Commissioner is of the opinion that Tilila  
2 Siola’a Walker-Sumchai, Tongi Tupe LLC, PATOA, American Tonga Global Diaspora PTOA, and  
3 Ptoa Global Movement for the Poor have offered and sold securities by means of written and oral  
4 communications including untrue statements of material fact and omissions of material fact necessary  
5 to make the statements, in light of the circumstances under which they were made, not misleading, in  
6 violation of Corporations Code § 25401.

7 Pursuant to Corporations Code § 25532, Tilila Siola’a Walker-Sumchai, Tongi Tupe LLC,  
8 PATOA, American Tonga Global Diaspora PTOA, and Ptoa Global Movement for the Poor are  
9 hereby ordered to desist and refrain from offering or selling any security in the State of California by  
10 means of any written or oral communication which includes an untrue statement of a material fact, or  
11 omits to state a material fact necessary in order to make the statements made, in the light of the  
12 circumstances under which they were made, not misleading.

13 This Order is necessary, in the public interest, for the protection of investors and consistent  
14 with the purposes, policies, and provisions of the Corporate Securities Law of 1968.

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16 Dated: September 19, 2023  
17 Los Angeles, California

CLOTHILDE V. HEWLETT  
Commissioner of Financial Protection and Innovation

18  
19 By \_\_\_\_\_  
20 MARY ANN SMITH  
21 Deputy Commissioner  
22 Enforcement Division  
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