

**ADMINISTRATIVE PROCEEDING
BEFORE THE
SECURITIES COMMISSIONER OF MARYLAND**

IN THE MATTER OF:	*	
GLOBAL PACIFIC	*	
INVESTMENTS, LLC,	*	
d/b/a Trillionaires Club	*	Securities Docket No. 2009-0162
ROSA ASKEW,	*	
DEBORAH F. FOX,	*	
and	*	
JACQUELINE Q. CUSSAAC	*	
Respondents	*	
* *	*	* *

**FINAL ORDER TO CEASE AND DESIST
AND ORDER OF BAR**

WHEREAS, the Division of Securities of the Office of the Maryland Attorney General (the “Division”), pursuant to the authority granted by the Maryland Securities Act, Corporations and Associations Article, section 11-701, Annotated Code of Maryland (2007 Repl. Vol. and 2008 Supp.) (the “Act”), instituted an investigation into the securities-related activities of Global Pacific Investments, LLC (“Global”), Rosa Askew (“Askew”), Deborah Fox (“Fox”) and Jacqueline Cussaac (“Cussaac”) (collectively “Respondents”); and

WHEREAS, on the basis of that investigation, the Maryland Securities Commissioner (the “Commissioner”) concluded that the Respondents may have engaged in acts or practices constituting violations of the Act and further determined that action against the Respondents is in the public interest; and

WHEREAS, pursuant to section 11-701.1(a) of the Act, on June 2, 2009, the Commissioner issued an Order To Show Cause (the “Order”), incorporated herein by reference, requiring Respondents to show cause why: each Respondent should not be barred permanently from engaging in the securities and investment advisory business in Maryland; why a civil monetary penalty should not be entered against each Respondent; and why a final order should not be entered ordering each of the Respondents to cease and desist from further violations of the Act; and

WHEREAS, the Order gave Respondents notice of the opportunity for a hearing in this matter, provided that Respondents submit an answer within 15 days of service of the Order, including any request for a hearing, and gave notice to Respondents that failure to do so would be deemed a waiver of the right to a hearing and result in the entry of a final order; and

WHEREAS, a copy of the Order was served upon Respondents at their last known addresses in Maryland and upon the Commissioner in accordance with section 11-802 of the Act; and

WHEREAS, the Respondents have not submitted an answer to the Order, nor a written request for a hearing; and

WHEREAS, the Commissioner has determined that it is in the public interest to issue this Final Order,

NOW, THEREFORE, THE COMMISSIONER FINDS AND ORDERS:

I. JURISDICTION

1. The Commissioner has jurisdiction in this proceeding pursuant to Section 11-701.1 of the Act.

II. RESPONDENTS

2. Global is a Nevada corporation that at all times conducted business from Washington DC. Global has never been registered as a broker-dealer or investment adviser in the State of Maryland. Global also does business under the name “Trillionaires Club” (“TC”).

3. Askew resides in Prince George’s County, Maryland. She has never been registered as a broker-dealer, broker-dealer agent, investment adviser or investment adviser representative in the State of Maryland. Askew is a principal, founder, and chief executive officer of Global.

4. Fox resides in Prince George’s County, Maryland. She has never been registered as a broker-dealer, broker-dealer agent, investment adviser or investment adviser representative in the State of Maryland. Fox is an operational director of Global.

5. Cussaac resides in Prince George’s County, Maryland. She has never been registered as a broker-dealer, broker-dealer agent, investment adviser or investment adviser representative in the State of Maryland. Cussaac is a director of the Trillionaires Club.

III. STATEMENT OF FACTS

6. Askew, Fox, and Cussaac offered and sold two investment opportunities through Global.

7. The first was an investment contract that promised investors that their mortgages would be paid back in five years. For example, an investor who paid \$50,000 was promised that her \$323,149 mortgage debt would be paid off within five years. At the end of the five years, according to the contract, the investor and Global would each be 50% owners of the property.

Global made initial mortgage payments but has now defaulted on its obligations under the investment contract. Global provided no explanation for the default.

8. The other investment program was offered through the Trillionaires Club. That investment contract promised investors 100% return on their principal in 35 to 60 days. When investors failed to receive the promised return on their TC investments, they were told that their money was invested with Omar Fitzgerald of Fitzgerald Enterprises, LLC (collectively “Fitzgerald”).

9. Fitzgerald in turn claimed to have invested the money with Piendor Investments Limited (“Piendor”). Piendor appears to be involved in what can be described as an international prime bank scheme. Piendor claims it is due \$5,000,000,000 that would be released after it satisfied certain international banking requirements. Pursuant to the scheme, the “international banking requirements” are never met and more money is requested.

10. Respondents raised over \$600,000 from 44 Maryland investors through their investment schemes.

11. No risk disclosure was given to investors for either investment contract.

12. The investment contracts that Respondents offered and sold are not registered in Maryland. There has been no exemption filing made in Maryland and no claim of preemption.

IV. CONCLUSIONS OF LAW

The Commissioner concludes that:

13. The investments that Respondents sold constitute “securities” pursuant to section 11-101(r) of the Act.

14. Respondents offered and sold unregistered securities in violation of section 11-

501 of the Act.

15. Respondents offered and sold securities in Maryland without being registered as a broker-dealer, issuer agent or broker-dealer agent, in violation of section 11-401 of the Act.

16. Respondent Global employed agents to engage in the offer and sale of securities without those individuals being registered in this State as agents in violation of section 11-402 of the Act.

17. Respondents violated the anti-fraud provisions in section 11-301 of the Act when they failed to disclose to their clients that they were not registered as a broker-dealer or agent for the purposes of selling the securities offer by Global; failed to disclose to their clients that the investments were not registered; and failed to disclose the risk that the investments would not be paid back.

V. SANCTIONS

NOW, THEREFORE, the Commissioner finds it to be in the public interest to issue this Final Order, and IT IS HEREBY ORDERED THAT:

18. Respondents each permanently cease and desist from engaging in the offer and sale of unregistered, non-exempt securities in violation of section 11-501 of the Act.

19. Respondents each permanently cease and desist from acting as an unregistered agent or broker-dealer in Maryland in violation of section 11-401 of the Act.

20. Respondents each permanently cease and desist from employing an unregistered agent for the offer and sale of securities in Maryland in violation of section 11-402 of the Act.

21. Respondents permanently cease and desist from engaging in fraud in violation of section 11-301 of the Act.

22. Respondents are permanently barred from engaging in the securities and investment advisory businesses in Maryland for or on behalf of others, or from acting as a principal or consultant in any entity so engaged, or from acting as a broker-dealer, broker-dealer agent, issuer-agent, investment adviser or investment adviser representative in Maryland.

23. Respondents are jointly and severally assessed a civil monetary penalty, pursuant to section 11-701.1 of the Act, in the amount of \$616,000 (\$3,500 times 4 violations for each of the 44 investors), payable by certified check to the order of the Office of the Attorney General. This fine will be reduced by any amount repaid to investors to the satisfaction of the Commissioner within 30 days of the date of this Order.

VI. JURISDICTION RETAINED

24. Jurisdiction is retained by the Commissioner for the purposes of enabling any party to this Final Order to apply for such further orders and directions as may be necessary or appropriate for the construction or enforcement of this Final Order.

VII. APPEAL RIGHTS

25. Any Respondent may appeal this Final Order to the appropriate Circuit Court of the State of Maryland within 30 days from the date this Final Order is mailed by the Division.

SO ORDERED:

**Commissioner's Signature is
on File with Original Document**

July 13, 2009

MELANIE SENTER LUBIN
Securities Commissioner

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