

1 STATE OF WASHINGTON  
2 DEPARTMENT OF FINANCIAL INSTITUTIONS  
3 SECURITIES DIVISION

4 IN THE MATTER OF DETERMINING ) Order Number S-11-0655-11-SC01  
5 Whether there has been a violation of the )  
6 Securities Act of Washington by: ) STATEMENT OF CHARGES AND  
7 Sansani Manphakdee, ) NOTICE OF INTENT TO ENTER  
8 a/k/a Sansanee Manpakdee, ) ORDER TO CEASE AND DESIST,  
9 d/b/a Global Pacific Traders Group, ) IMPOSE FINES, AND RECOVER COSTS  
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25 )  
Respondent )

THE STATE OF WASHINGTON TO: Sansani Manphakdee,  
a/k/a Sansanee Manpakdee;  
d/b/a Global Pacific Traders Group

11 **STATEMENT OF CHARGES**

12 Please take notice that the Securities Administrator of the State of Washington has reason  
13 to believe that Respondent Sansani Manphakdee (a/k/a Sansanee Manpakdee), doing business as  
14 Global Pacific Traders Group, has violated the Securities Act of Washington and that her  
15 violations justify the entry of an order of the Securities Administrator under RCW 21.20.390 to  
16 cease and desist from such violations, to impose fines, and recover costs. The Securities  
17 Administrator finds as follows:

18 **TENTATIVE FINDINGS OF FACT**

19 **Respondent**

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21 1. Sansani “Deary” Manphakdee (a/k/a Sansanee Manpakdee) is a resident of  
22 California, who did business as “Global Pacific Traders Group” and used the website  
23 gptradersgroup.com.

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25 STATEMENT OF CHARGES AND NOTICE OF  
INTENT TO ENTER ORDER TO CEASE AND DESIST,  
IMPOSE FINES, AND RECOVER COSTS

1 DEPARTMENT OF FINANCIAL INSTITUTIONS  
Securities Division  
PO Box 9033  
Olympia, WA 98507-9033  
360-902-8760

1 Nature of the Offering

2 2. Between approximately August 2006 and February 2008, Manphakdee offered  
3 and sold over \$500,000 of investments to a Washington resident, after meeting him through  
4 family members. In August 2006, Manphakdee began corresponding by e-mail with the  
5 Washington investor and stated that she could assist him with investment planning.  
6 Manphakdee advised that the stock market offered “too much risk for too little returns” and  
7 convinced the Washington investor to sell some of his stocks and mutual funds, and to invest  
8 the proceeds with her company, Global Pacific Traders Group.  
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10 3. Manphakdee told the Washington investor that she had been working as an  
11 investment executive at Global Pacific Traders Group for more than five years. Manphakdee  
12 described Global Pacific Traders Group as an “international investment trading network.”  
13 Manphakdee stated that she worked in “specialized arbitrage” and coordinated the “buy and  
14 sell transactions of trade finance instruments between trading members.” According to  
15 Manphakdee, the trading members were highly specialized investment bankers that were  
16 contracted with the World Bank and other international banks. Manphakdee represented that  
17 “we trade in volumes of Trillions of Dollars on a daily basis” and that she controlled and  
18 coordinated investments that were used as leverage in trading transactions. Manphakdee led  
19 the investor to believe that investments with Global Pacific Trader Group were normally  
20 available only to individuals whose net worth exceeded \$50 million.  
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22 4. Manphakdee told the Washington investor that his investment funds would be  
23 put in a “non-depletion account” and that the funds would “never be taken out of this account”  
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1 unless the investor withdrew the funds or closed the account. Manphakdee represented that she  
2 could guarantee a 50 percent annual return on the investment because she did not trade “when  
3 there’s even a little bit of risk.” The investor was passive and relied completely on  
4 Manphakdee and Global Pacific Traders Group to generate a return on the investment.

5 5. Manphakdee directed the investor to deposit their investment funds into a bank  
6 account in the name of “Reboot.” Between approximately August 2006 and February 2008, the  
7 Washington investor invested a total of more than \$500,000, which represented most of the  
8 Washington investor’s life savings.

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10 6. Manphakdee told the Washington investor that he could access his account  
11 online through the Global Pacific Traders Group website, gptradersgroup.com. Manphakdee  
12 provided the Washington investor with a username and password, and informed him that he  
13 could log into his account and see his “money grow every week.” The investor periodically  
14 logged into the website and monitored his account online. Online account records showed  
15 “Dividend/Interest Income” that was purportedly being deposited into his account on a weekly  
16 basis. Online account records showed the “Net Security Market Value” of his account growing  
17 steadily to more than \$2.7 million.

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19 7. In February 2008, Manphakdee solicited the Washington investor to invest in a  
20 new investment program that would purportedly take advantage of “stimulus measures” offered  
21 by the U.S. government. According to Manphakdee, the investment program would last twelve  
22 weeks, and would include two six-week cycles of “20% compounding interest.” Manphakdee  
23 stressed that the investments funds had to be deposited within two weeks in order to be  
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1 included in the investment program. Approximately one week later, the Washington investor  
2 invested \$50,000 in the purported investment program. Later that year, after the investor  
3 requested a withdrawal of some of his investment funds, Manphakdee arranged for funds to be  
4 deposited into the investor's bank account in Washington.

5 8. Between 2009 and 2010, Manphakdee provided various excuses for why  
6 additional funds could not be withdrawn from the investor's account, including bank errors and  
7 a purported SEC "freeze" on the company's accounts. Manphakdee assured the investor: "your  
8 money is safe and secured . . . you have my personal guarantee that you will never ever lose  
9 your money. .... I assure you that your money is actually safe, nothing has happened to it."

10 9. Manphakdee told the investor that she would set up a "retirement trust fund"  
11 that would allow the investor to withdraw funds more easily. Manphakdee claimed that the  
12 retirement trust fund was "set up directly" with the Federal Reserve and "guaranteed by the US  
13 government." Manphakdee directed the investor to send copies of driver's licenses and social  
14 security numbers for his family. Manphakdee stated that she needed this information to set up  
15 the retirement trust fund. The investor later learned that shortly after sending this information  
16 to Manphakdee, bank accounts were fraudulently opened in the name of the investor and his  
17 wife and that checks written on the account were made out to Manphakdee's boyfriend.  
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#### 19 Misrepresentations and Omissions

20 10. In the offer and sale of the investments described above, Manphakdee made  
21 false and misleading statements regarding the purported returns and the risks associated with  
22 the investments. While claiming to guarantee a 50% return on the investment, Manphakdee  
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1 failed to disclose material information, including but not limited to, the basis and assumptions  
2 underlying the projected returns, the source and terms of the guarantee, and the specific  
3 intended use of investor proceeds. The website used by Manphakdee included logo from the  
4 Federal Deposit Insurance Corporation (“FDIC”), which gave the false and misleading  
5 impression that Global Pacific Traders Group was insured by the FDIC. Manphakdee failed to  
6 disclose that Global Pacific Traders Group was not FDIC insured, was not a state or federally  
7 chartered bank, and was not regulated as a bank or other financial institution.  
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9 Registration Status

10 11. Sansani Manphakdee is not currently registered as a securities salesperson or  
11 broker-dealer in the State of Washington and has not previously been so registered.

12 Based upon the Tentative Findings of Fact, the following Conclusions of Law are made:

13 **CONCLUSIONS OF LAW**

14 1. The offer and sale of the investments described above constitutes the offer or sale  
15 of a security as defined in RCW 21.20.005(10) and (12).

16 2. The offer and sale of said securities were in violation of RCW 21.20.140 because  
17 no registration for such offer and sale is on file with the Securities Administrator.

18 2. Sansani Manphakdee violated RCW 21.20.040 by offering or selling said  
19 securities while not registered as a securities salesperson or broker-dealer in the State of  
20 Washington.  
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22 3. The offer or sale of the stock described above was made in violation of RCW  
23 21.20.010 because, as set forth in the Tentative Findings of Fact, Respondent Sansani  
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1 Manphakdee made misstatements of material facts or omitted to state material facts necessary in  
2 order to make the statements made, in light of circumstances under which they were made, not  
3 misleading.

4 **NOTICE OF INTENT TO ORDER THE RESPONDENT TO CEASE AND DESIST**

5 Pursuant to RCW 21.20.390(1), and based on the above Tentative Findings of Fact and  
6 Conclusions of Law, the Securities Administrator intends to order that Sansani Manphakdee, her  
7 agents and employees, each cease and desist from violations of RCW 21.20.140, RCW  
8 21.20.040, and RCW 21.20.010.

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10 **NOTICE OF INTENT TO IMPOSE FINES**

11 Pursuant to RCW 21.20.395, and based upon the Tentative Findings of Fact and  
12 Conclusions of Law, the Securities Administrator intends to order that Respondent Sansani  
13 Manphakdee shall be liable for and shall pay a fine of \$20,000.

14 **NOTICE OF INTENT TO RECOVER COSTS**

15 Pursuant to RCW 21.20.390(5), and based upon the Tentative Finds of Fact and  
16 Conclusions of Law, the Securities Administrator intends to order that Respondent Sansani  
17 Manphakdee shall pay the Securities Division the costs, fees, and other expenses incurred in the  
18 conduct of the administrative investigation and hearing of this matter of not less than \$5,000.

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21 **AUTHORITY AND PROCEDURE**

1 This Statement of Charges is entered pursuant to the provisions of chapter 21.20 RCW  
2 and is subject to the provisions of RCW 34.05. The Respondent may make a written request for  
3 a hearing as set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY  
4 FOR HEARING accompanying this order.

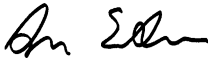
5 If a Respondent does not request a hearing, the Securities Administrator intends to adopt  
6 the above Tentative Findings of Fact and Conclusions of Law as final and enter an order to cease  
7 and desist permanent as to that Respondent, and impose the fines and costs sought.  
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10 Dated and Entered this 19th day of October, 2011.

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13 WILLIAM M. BEATTY  
14 Securities Administrator

15 Approved by:

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17 Suzanne E. Sarason  
18 Chief of Enforcement

15 Presented by:

16 

17 Robert Kondrat  
18 Enforcement Attorney