

**STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS
SECURITIES DIVISION**

IN THE MATTER OF DETERMINING
Whether there has been a violation of the
Securities Act of Washington by:

Bonanza Global Solutions, LLC;
Francisco Sarabia;
Paz Sanchez-Majano,
Respondents.

Order No. S-23-3634-24-FO01

ENTRY OF FINDINGS OF FACT AND
CONCLUSIONS OF LAW AND FINAL ORDER TO
CEASE AND DESIST, TO IMPOSE FINES, AND TO
CHARGE COSTS AS TO BONANZA GLOBAL
SOLUTIONS LLC, FRANCISCO SARABIA, AND PAZ
SANCHEZ-MAJANO

THE STATE OF WASHINGTON TO:

Bonanza Global Solutions, LLC
Francisco Sarabia
Paz Sanchez-Majano

On January 5, 2024, the Securities Administrator of the state of Washington issued Statement of Charges and Notice of Intent to Enter Order to Cease and Desist, To Impose Fines, and to Charge Costs, Order No. S-23-3634-23-SC01 (“Statement of Charges”). The Statement of Charges, together with a Notice of Opportunity for Hearing (“Notice”) and an Application for Adjudicative Hearing (“Application”), were served on Respondents Bonanza Global Solutions, LLC, Francisco Sarabia, and Paz Sanchez-Majano, on January 10, 2024. The Notice advised Respondents Bonanza Global Solutions, LLC, Francisco Sarabia, and Paz Sanchez-Majano that the Application must be received within twenty days from the date of service. Respondents Bonanza Global Solutions, LLC, Francisco Sarabia, and Paz Sanchez-Majano failed to request an administrative hearing within twenty days of service.

The Securities Administrator therefore adopts as final the following Findings of Fact and Conclusions of Law as set forth in the Statement of Charges and enters a final order against Respondents Bonanza Global Solutions, LLC, Francisco Sarabia, and Paz Sanchez-Majano to cease and desist from violations of the Securities Act, and to impose the fines and costs sought in the Statement of Charges.

1 **FINDINGS OF FACT**

2 **Respondents**

3 1. Bonanza Global Solutions, LLC (“Bonanza”) is a California entity formed on February 24,
4 2022, with its principal place of business in Beverly Hills, California. Bonanza Global Solutions, LLC
5 purports to be “a hedge fund with the mission of providing our partners with attractive profitability and growth
6 opportunities.”

7 2. Francisco Sarabia (“Sarabia”) resided in Paramount, California. Francisco Sarabia was the
8 President, Co-Founder, and CEO of Bonanza at all relevant times.

9 3. Paz Sanchez-Majano (“Sanchez-Majano”) resided in Riverside, California. Paz Sanchez-
10 Majano was the Managing Partner, Co-Founder, and COO of Bonanza at all relevant times.

11 **Nature of the Conduct**

12 **Overview**

13 4. Beginning no later than September 30th, 2022, Bonanza, Sarabia, and Sanchez-Majano offered
14 and sold unregistered securities to Washington state residents in the form of investment contracts.

15 5. Respondents sold a minimum of \$15,000 of these securities to at least two Washington
16 residents. In these offers and sales, for which they were not registered, Bonanza, Sarabia, and Sanchez-Majano
17 made material misrepresentations and omissions.

18 **The Offering**

19 6. Bonanza offered several “Bonanza Packages” and “Bonanza VIP Packages” (collectively, the
20 “Packages”) to investors via Respondents’ website, bonanzaglobalsolutions.net. In its marketing of the
21 Packages, Bonanza touted itself as having “the best traders and diversification strategies” for investors.

22 7. Bonanza’s Packages ranged in purchase price from \$500 for the “Junior Bonanza Package” to
23 \$1 million for the “Legendary Bonanza VIP Package.”

1 8. Bonanza represented that, for each package, investors could choose their withdrawal interval
2 and receive a return on investment (“ROI”) as follows: “Monthly: 10%, Quarterly: 12.5%, Every 6 Months:
3 13.75%, Annually: 15%.”

4 9. Investors purchased these Bonanza Packages by signing a note for repayment with interest. In
5 order for investors to receive a profit, investors were solely required to invest funds into Bonanza and sign an
6 investment note that purported to offer a 10% monthly return.

7 10. Bonanza then, in its sole discretion, pooled and invested investor funds “to earn attractive
8 returns for their investors.”

9 11. In an effort to make investors feel more secure in their investment, Bonanza represented to
10 investors that they “allow[ed] qualified investors to insure their investment for a period of 2 years with a fixed
11 monthly return of 5% thru New York Life Insurance.”

12 12. Bonanza further offered investors a “Money Back Guaranteed” where investors could
13 purportedly receive 80% of the capital they invested within five business days if they made a written request
14 for “immediate access” to their funds.

15 13. Respondents also offered an Affiliate program whereby, after signing up for the Affiliate
16 program, investors could introduce and refer new clients and affiliates to Bonanza. When an affiliate
17 successfully referred a new investor who purchased any of the Bonanza investment packages, the referring
18 affiliate would receive a “bonus equivalent to 7% of the program acquired in the first level and 5% in the
19 second level.”

20 14. As of December of 2023, Respondents appear to have stopped offering their Packages and
21 Affiliate program on their website, bonanzaglobalsolutions.net. Beginning in December 2023, the website
22 bonanzaglobalsolutions.net represents itself as offering crypto market analysis and “comprehensive insights
23 into the world of cryptocurrency, investing, and everything related to the dynamic realm of digital assets.”

1 Investor A

2 15. On or about September 30th, 2022, Investor A purchased a Package from Bonanza for \$5,000.
3 Investor A and Sanchez-Majano then executed a note on October 3rd, 2022, outlining the terms of the purchase
4 agreement.

5 16. Investor A and Sanchez-Majano agreed that the note would mature on September 30th, 2023,
6 and that Investor A would receive a monthly interest payment of 10% from September 2022 through
7 September 2023.

8 17. Under the terms of the note, both parties agreed that the note was “being acquired for
9 investment.” Other than providing the initial capital, the terms of the note did not require Investor A to take
10 any further action to receive the 10% monthly ROI.

11 18. Investor A received an interest payment in October of 2022, but did not receive any further
12 interest payments as promised. Despite Investor A’s requests to continue receiving interest payments or to
13 recover the initial funds, Investor A has not received any refund.

14 Investor B

15 19. On or about September 30th, 2022, Investor B purchased a Package from Bonanza for \$10,000.
16 Investor B and Sanchez-Majano then executed a note on October 3rd, 2022, outlining the terms of the purchase
17 agreement.

18 20. Investor B and Sanchez-Majano agreed that the note would mature on September 30th, 2023,
19 and that Investor B would receive a monthly interest payment of 10% from September of 2022 through
20 September of 2023.

21 21. Under the terms of the note, both parties agreed that the note was “being acquired for
22 investment.” Other than providing the initial capital, the terms of the note did not require Investor B to take
23 any further action to receive the 10% monthly ROI.

1 22. Investor B received an interest payment in October of 2022, but did not receive any further
2 interest payments as promised. Despite Investor B's attempts to continue receiving interest payments or
3 recover the initial funds, Investor B has not received any refund.

4 **Misrepresentations and Omissions**

5 23. Bonanza Global Solutions, LLC, Francisco Sarabia, and Paz Sanchez-Majano failed to disclose
6 to investors that the Bonanza Packages are securities, and that anyone who offers or sells securities in the state
7 of Washington must be registered or exempt from registration.

8 24. Bonanza Global Solutions, LLC, Francisco Sarabia, and Paz Sanchez-Majano failed to provide
9 prospective investors with Private Placement Memorandums ("PPM"), or something similar, to provide
10 investors with material information to make informed decisions about investing with Bonanza.

11 25. Bonanza Global Solutions, LLC, Francisco Sarabia, and Paz Sanchez-Majano failed to furnish
12 investors with information regarding the company's financial condition, business, results of operations, or
13 management.

14 26. While offering and selling Bonanza Packages, Bonanza Global Solutions, LLC, Francisco
15 Sarabia, and Paz Sanchez-Majano failed to provide a reasonable basis for their revenue projections.

16 **Registration Status**

17 27. Bonanza Global Solutions, LLC is not currently registered to sell its securities in the state of
18 Washington and has not previously been so registered, nor has it filed a claim of exemption from registration.

19 28. Francisco Sarabia is not currently registered as a securities salesperson or broker-dealer in the
20 state of Washington and has not previously been so registered.

21 29. Paz Sanchez-Majano is not currently registered as a securities salesperson or broker-dealer in
22 the state of Washington and has not previously been so registered.

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

1 **CONCLUSIONS OF LAW**

2 1. The offer and/or sale of the securities described above constitutes the offer and/or sale of a
3 security as defined in RCW 21.20.005(14) and (17).

4 2. Bonanza Global Solutions, LLC, Francisco Sarabia, and Paz Sanchez-Majano violated RCW
5 21.20.140, the securities registration section of the Securities Act of Washington, by offering and/or selling
6 securities for which no registration is on file with the Securities Administrator.

7 3. Francisco Sarabia and Paz Sanchez-Majano violated RCW 21.20.040, the licensee registration
8 section of the Securities Act of Washington, by offering and/or selling said securities while not being
9 registered as a securities salesperson or broker-dealer in the state of Washington.

10 4. Bonanza Global Solutions, LLC, Francisco Sarabia, and Paz Sanchez-Majano violated RCW
11 21.20.010, the anti-fraud section of the Securities Act of Washington, by making untrue statements of material
12 fact or omitting to state material facts necessary to make the statements made, in light of the circumstances in
13 which they were made, not misleading.

14 Based upon the foregoing and finding it in the public interest:

15 **FINAL ORDER**

16 IT IS HEREBY ORDERED that Respondents Bonanza Global Solutions, LLC, Francisco Sarabia, and
17 Paz Sanchez-Majano, and their agents and employees, shall each cease and desist from offering and/or selling
18 securities in any manner in violation of RCW 21.20.140, the securities registration section of the Securities
19 Act of Washington.

20 IT IS FURTHER ORDERED that Respondents Francisco Sarabia and Paz Sanchez-Majano, and their
21 agents and employees, shall each cease and desist from offering and/or selling securities in any manner in
22 violation of RCW 21.20.040, the registration section of the Securities Act of Washington.

1 IT IS FURTHER ORDERED that Respondents Bonanza Global Solutions, LLC, Francisco Sarabia,
2 and Paz Sanchez-Majano, and their agents and employees, shall each cease and desist from violating RCW
3 21.20.010, the anti-fraud section of the Securities Act of Washington.

4 IT IS FURTHER ORDERED that Respondent Bonanza Global Solutions, LLC shall be liable for and
5 pay a fine in the amount of \$20,000, that Respondent Francisco Sarabia shall be liable for and pay a fine in
6 the amount of \$20,000, and that Respondent Paz Sanchez-Majano shall be liable for and pay a fine in the
7 amount of \$20,000.

8 IT IS FURTHER ORDERED that Respondents Bonanza Global Solutions, LLC, Francisco Sarabia,
9 and Paz Sanchez-Majano, shall be jointly and severally liable for and pay costs in the amount of \$1,375.

10 **AUTHORITY AND PROCEDURE**

11 This FINAL ORDER is entered pursuant to RCW 21.20.390 and is subject to Chapter 34.05 RCW.
12 Respondents have the right to petition the superior court for judicial review of this agency action under Part
13 V of Chapter 34.05 RCW. Pursuant to RCW 21.20.395(4), a certified copy of this Final Order may be filed in
14 superior court. If so filed, the clerk shall treat the Final Order in the same manner as a superior court judgment
15 as to the fine, and the fine may be recorded, enforced, or satisfied in like manner.

16 **WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.**

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18 SIGNED and ENTERED this 12th day of February, 2024.

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/s/

William M. Beatty
Securities Administrator

Approved by:

Presented by:

/s/
Brian J. Guerard
Chief of Enforcement

/s/
Kassidy Smith
Financial Legal Examiner

Reviewed by:

/s/
Holly Mack-Kretzler
Financial Legal Examiner Supervisor