

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

GLOBAL WHOLEHEALTH
PARTNERS CORP., CHARLES
STRONGO, BRIAN M. VOLMER,
JOSHUA YAFA, JAMIE M. YAFA,
and EMPIRE ASSOCIATES INC.,

Defendants.

Case No. 3:22-cv-00219-WQH-BGS

**FINAL JUDGMENT AGAINST
DEFENDANT CHARLES STRONGO**

1 IT IS HEREBY ORDERED that Final Judgment is entered against Defendant
2 Charles Strongo (“Defendant”) as follows:

3 I.

4 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that Defendant
5 violated and is permanently restrained and enjoined from violating, directly or
6 indirectly, Section 10(b) of the Securities Exchange Act of 1934 (the “Exchange
7 Act”) [15 U.S.C. § 78j(b)] and Exchange Act Rule 10b-5 [17 C.F.R. § 240.10b-5], by
8 using any means or instrumentality of interstate commerce, or of the mails, or of any
9 facility of any national securities exchange, in connection with the purchase or sale of
10 any security:

- 11 (a) to employ any device, scheme, or artifice to defraud;
12 (b) to make any untrue statement of a material fact, or to omit to state a
13 material fact necessary in order to make the statements made, in the light
14 of the circumstances under which they were made, not misleading, or
15 (c) to engage in any act, practice, or course of business which operates or
16 would operate as a fraud or deceit upon any person
17 by, directly or indirectly, (i) creating a false appearance or otherwise deceiving any
18 person about the price or trading market for any security, or (ii) making any false or
19 misleading statement, or disseminating any false or misleading documents, materials,
20 or information, concerning matters relating to a decision by an investor or prospective
21 investor to buy or sell securities of any company.

22 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as
23 provided in Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also
24 binds the following who receive actual notice of this Final Judgment by personal
25 service or otherwise: (a) Defendant’s officers, agents, servants, employees, and
26 attorneys; and (b) other persons in active concert or participation with Defendant or
27 with anyone described in (a).

28 II.

1 IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that
2 Defendant violated and is permanently restrained and enjoined from violating Section
3 17(a) of the Securities Act of 1933 (the “Securities Act”) [15 U.S.C. § 77q(a)] in the
4 offer or sale of any security by the use of any means or instruments of transportation
5 or communication in interstate commerce or by use of the mails, directly or
6 indirectly:

7 (a) to employ any device, scheme, or artifice to defraud;
8 (b) to obtain money or property by means of any untrue statement of a
9 material fact or any omission of a material fact necessary in order to
10 make the statements made, in light of the circumstances under which
11 they were made, not misleading; or
12 (c) to engage in any transaction, practice, or course of business which
13 operates or would operate as a fraud or deceit upon the purchaser
14 by, directly or indirectly, (i) creating a false appearance or otherwise deceiving any
15 person about the price or trading market for any security, or (ii) making any false or
16 misleading statement, or disseminating any false or misleading documents, materials,
17 or information, concerning matters relating to a decision by an investor or prospective
18 investor to buy or sell securities of any company.

19 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as
20 provided in Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also
21 binds the following who receive actual notice of this Final Judgment by personal
22 service or otherwise: (a) Defendant’s officers, agents, servants, employees, and
23 attorneys; and (b) other persons in active concert or participation with Defendant or
24 with anyone described in (a).

1 III.

2 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, pursuant
3 to Section 21(d)(5) of the Exchange Act, 15 U.S.C. § 78u(d)(2), Defendant is
4 prohibited from acting as an officer or director of any issuer that has a class of
5 securities registered pursuant to Section 12 of the Exchange Act, 15 U.S.C. § 78l, or
6 that is required to file reports pursuant to Section 15(d) of the Exchange Act,
7 15 U.S.C. § 78o(d).

8 IV.

9 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, pursuant
10 to Section 20(g)(1) of the Securities Act, 15 U.S.C. § 77t(g)(1), and Section 21(d)(6)
11 of the Exchange Act, 15 U.S.C. § 78u(d)(6), Defendant is permanently barred from
12 participating in an offering of penny stock, including engaging in activities with a
13 broker, dealer, or issuer for purposes of issuing, trading, or inducing or attempting to
14 induce the purchase or sale of any penny stock. A penny stock is any equity security
15 that has a price of less than five dollars, except as provided in Rule 3a51-1 under the
16 Exchange Act, 17 C.F.R. 240.3a51-1.

17 V.

18 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Defendant
19 is liable for disgorgement of \$278,822.92, representing net profits gained as a result
20 of the conduct alleged in the Complaint plus prejudgment interest thereon in the
21 amount of \$12,519.03, and partially offset by the \$121,599.70 restitution ordered in
22 *United States v. Volmer*, No. 21-CR-1310-WQH (S.D. Cal.). The Court finds that
23 sending the disgorged funds to the United States Treasury, as ordered below, is
24 consistent with equitable principles. Defendant shall satisfy this obligation by paying
25 \$169,742.25 to the Securities and Exchange Commission within 30 days after entry
26 of this Final Judgment.

27 Defendant may transmit payment electronically to the Commission, which will
28 provide detailed ACH transfer/Fedwire instructions upon request. Payment may also

1 be made directly from a bank account via Pay.gov through the SEC website at
2 <http://www.sec.gov/about/offices/ofm.htm>. Defendant may also pay by certified
3 check, bank cashier's check, or United States postal money order payable to the
4 Securities and Exchange Commission, which shall be delivered or mailed to

5 Enterprise Services Center

6 Accounts Receivable Branch

7 6500 South MacArthur Boulevard

8 Oklahoma City, OK 73169

9 and shall be accompanied by a letter identifying the case title, civil action number,
10 and name of this Court; Charles Strongo as a defendant in this action; and specifying
11 that payment is made pursuant to this Final Judgment.

12 Defendant shall simultaneously transmit photocopies of evidence of payment
13 and case identifying information to the Commission's counsel in this action. By
14 making this payment, Defendant relinquishes all legal and equitable right, title, and
15 interest in such funds and no part of the funds shall be returned to Defendant. The
16 Commission shall send the funds paid pursuant to this Final Judgment to the United
17 States Treasury.

18 The Commission may enforce the Court's judgment for disgorgement and
19 prejudgment interest by using all collection procedures authorized by law, including,
20 but not limited to, moving for civil contempt at any time after 30 days following entry
21 of this Final Judgment.

22 Defendant shall pay post judgment interest on any amounts due after 30 days
23 of the entry of this Final Judgment pursuant to 28 U.S.C. § 1961.

24 VI.

25 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, solely for
26 purposes of exceptions to discharge set forth in Section 523 of the Bankruptcy Code,
27 11 U.S.C. § 523, the allegations in the complaint are true and admitted by Defendant,
28 and further, any debt for disgorgement, prejudgment interest, civil penalty or other

1 amounts due by Defendant under this Final Judgment or any other judgment, order,
2 consent order, decree or settlement agreement entered in connection with this
3 proceeding, is a debt for the violation by Defendant of the federal securities laws or
4 any regulation or order issued under such laws, as set forth in Section 523(a)(19) of
5 the Bankruptcy Code, 11 U.S.C. § 523(a)(19).

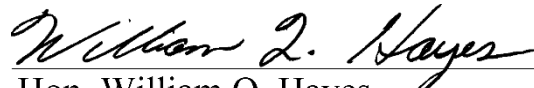
6 VII.

7 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that this Court
8 shall retain jurisdiction of this matter for the purposes of enforcing the terms of this
9 Final Judgment.

10 VIII.

11 There being no just reason for delay, pursuant to Rule 54(b) of the Federal
12 Rules of Civil Procedure, the Clerk of Court is ordered to enter this Final Judgment
13 forthwith and without further notice.

14
15
16 Dated: August 26, 2026


Hon. William Q. Hayes
United States District Court