

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

IN THE MATTER OF DETERMINING) Order No.: S-09-216-15-CO01
whether there has been a violation of the)
Securities Act of Washington by:)
) CONSENT ORDER AS TO LITTLE LOAN SHOPPE LTD.;
) LITTLE LOAN SHOPPE AMERICA, LLC; 639504 BC,
Little Loan Shoppe Ltd.; Little Loan Shoppe) LTD.; LITTLE LOAN SHOPPE CANADA, LLC; 0738116
America, LLC; 639504 BC, Ltd.; Little Loan) BC, LTD.; 0738126 BC, LTD.; LLS AMERICA, LLC; LLS-A,
Shoppe Canada, LLC; 0738106 BC, Ltd; 0738116) LLC (WA); PACIFIC LLS, LLC; ATLANTIC LLS, LLC;
BC, Ltd; 0738126 BC, Ltd; LLS America, LLC;) EASTERN LLS, LLC; CENTRAL LLS, LLC; LLS-A, LLC
LLS-A, LLC (WA); Pacific LLS, LLC; Atlantic) (NV); LLS-NW, LLC; LLS-US, LLC; AND DORIS NELSON
LLS, LLC; Eastern LLS, LLC; Central LLS, LLC;)
LLS-A, LLC (NV); LLS-NW, LLC; LLS-US,)
LLC; Doris Nelson; Paul Cooper;)
)
)
Respondents.)

INTRODUCTION

On January 28, 2010, the Securities Administrator of the Securities Division of the Department of Financial Institutions (“Securities Division”) issued a Statement of Charges and Notice of Intent to Enter Order to Cease and Desist, to Impose Fines, and to Charge Costs (“Statement of Charges”), Order Number S-09-216-09-SC01, against Respondents Little Loan Shoppe Ltd.; Little Loan Shoppe America, LLC; 639504 BC, Ltd.; Little Loan Shoppe Canada, LLC; 0738106 BC, Ltd.; 0738116 BC, Ltd.; 0738126 BC, Ltd.; LLS America, LLC; LLS-A, LLC (WA); Pacific LLS, LLC; Atlantic LLS, LLC; Eastern LLS, LLC; Central LLS, LLC; LLS-A, LLC (NV); LLS-NW, LLC; LLS-US, LLC; Doris Nelson and Paul Cooper. Pursuant to the Securities Act of Washington, Chapter 21.20 RCW, the Securities Division and Respondents Little Loan Shoppe Ltd.; Little Loan Shoppe America, LLC; 639504 BC, Ltd; Little Loan Shoppe Canada, LLC; 0738106 BC, Ltd.; 0738116 BC, Ltd.; 0738126 BC, Ltd.; LLS America, LLC; LLS-A, LLC (WA); Pacific LLS, LLC; Atlantic LLS, LLC; Eastern LLS, LLC; Central LLS, LLC; LLS-A, LLC (NV); LLS-NW, LLC; LLS-US, LLC; and Doris Nelson do hereby enter into this CONSENT ORDER in settlement of the matters set forth in the Statement of Charges and as alleged below. Respondents neither admit nor deny the Findings of Fact and Conclusions of Law as stated below.

FINDINGS OF FACT

Respondents

1
2
3 1. Little Loan Shoppe Ltd. is a British Columbia company established on August 27, 1997 with its
4 principal place of business originally located in British Columbia. Little Loan Shoppe Ltd. dissolved on or about
5 January 2, 2006.

6 2. Little Loan Shoppe America, LLC is a Washington limited liability company established on May 18,
7 2001 with its principal place of business believed to be located in Spokane, Washington. Little Loan Shoppe America,
8 LLC dissolved on September 5, 2007.

9 3. 639504 BC, Ltd. is a British Columbia company established on December 24, 2001 with its principal
10 place of business believed to be located in Spokane, Washington. 639504 BC, Ltd. dissolved on or about August 6,
11 2007.

12 4. Little Loan Shoppe Canada, LLC is a Nevada limited liability company established on January 15,
13 2005 with its principal place of business believed to be located in Spokane, Washington.

14 5. 0738106 BC, Ltd. is a British Columbia company established on October 19, 2005 with its principal
15 place of business believed to be located in Spokane, Washington.

16 6. 0738116 BC, Ltd. is a British Columbia company established on October 19, 2005 with its principal
17 place of business believed to be located in Spokane, Washington.

18 7. 0738126 BC, Ltd. is a British Columbia company established on October 19, 2005 with its principal
19 place of business believed to be located in Spokane, Washington.

20 8. LLS America, LLC is a Nevada limited liability company established on November 3, 2005 with its
21 principal place of business believed to be located in Spokane, Washington. LLS America, LLC petitioned for Chapter
22 11 bankruptcy in July 2009.

23 9. LLS-A, LLC is a Washington limited liability company established on February 15, 2007 with its
24 principal place of business believed to be located in Spokane, Washington [“LLS-A, LLC (WA)”]. An involuntary
25 petition for Chapter 11 bankruptcy was filed against LLS-A, LLC (WA) in July 2009.

1 10. Pacific LLS, LLC is a Nevada limited liability company established on May 7, 2008 with its principal
2 place of business believed to be located in Spokane, Washington. Pacific LLS, LLC is currently in default status with
3 the Nevada Secretary of State.

4 11. Atlantic LLS, LLC is a Nevada limited liability company established on May 7, 2008 with its principal
5 place of business believed to be located in Spokane, Washington. Atlantic LLS, LLC is currently in default status with
6 the Nevada Secretary of State.

7 12. Eastern LLS, LLC is a Nevada limited liability company established on May 7, 2008 with its principal
8 place of business believed to be located in Spokane, Washington. Eastern LLS, LLC is currently in default status with
9 the Nevada Secretary of State.

10 13. Central LLS, LLC is a Nevada limited liability company established on May 7, 2008 with its principal
11 place of business believed to be located in Spokane, Washington. Central LLS, LLC is currently in default status with
12 the Nevada Secretary of State.

13 14. LLS-A, LLC is a Nevada limited liability company established on August 15, 2008 with its principal
14 place of business believed to be located in Spokane, Washington [“LLS-A, LLC (NV)”]. LLS-A, LLC (NV) is
15 currently in default status with the Nevada Secretary of State.

16 15. LLS-NW, LLC is a Nevada limited liability company established on August 15, 2008 with its
17 principal place of business believed to be located in Spokane, Washington. LLS-NW, LLC is currently in default
18 status with the Nevada Secretary of State.

19 16. LLS-US, LLC is a Nevada limited liability company established on August 15, 2008 with its principal
20 place of business believed to be located in Spokane, Washington. LLS-US, LLC is currently in default status with the
21 Nevada Secretary of State.

22 17. Doris Nelson (“Nelson”) is believed to reside in Colbert, Washington. Nelson acted as managing
23 member for Little Loan Shoppe Ltd.; Little Loan Shoppe America, LLC; 639504 BC Ltd.; Little Loan Shoppe Canada,
24 LLC; 0738106 BC Ltd.; 0738116 BC Ltd.; 0738126 BC Ltd.; LLS America, LLC; LLS-A, LLC (WA); Pacific LLS,

1 LLC; Atlantic LLS, LLC; Eastern LLS, LLC; Central LLS, LLC; LLS-A, LLC (NV); LLS-NW, LLC; and LLS-US,
2 LLC.

3 18. Paul Cooper (“Cooper”) is believed to reside in Puerto Vallarta, Mexico. Paul Cooper facilitated
4 securities transactions for Little Loan Shoppe.

5 *Nature of the Offerings*

6 *“Little Loan Shoppe” and Little Loan Shoppe Entities*

7 19. Nelson started Little Loan Shoppe Ltd. in British Columbia in 1997. The business purportedly offered
8 short term payday/installment loans through storefront offices in British Columbia. In 2001 Nelson expanded her
9 payday/installment loan operations to Spokane, Washington under the name Little Loan Shoppe America, LLC.

10 20. In approximately 2004, Nelson began offering payday loans over the internet, supposedly only to
11 Canadian customers, through www.littleloanshoppe.com.

12 21. In 2005 and 2006 Nelson established two companies in Nevada called LLS America, LLC and LLS
13 Canada, LLC. Those two companies registered as foreign corporations in the state of Utah and also registered with
14 Utah to become a consumer lender. LLS America, LLC and LLS Canada, LLC have no physical offices in Nevada or
15 Utah. Nelson claimed in bankruptcy proceedings for LLS America, LLC that LLS America, LLC has no employees
16 and instead contracts with another company created and managed by Nelson called Team Spirit America, LLC (“Team
17 Spirit America”) to conduct its operations. Nelson incorporated Team Spirit America in Washington State in May of
18 2006 and operates the company out of a building located in Spokane, Washington.

19 22. During the same time period that Nelson created Team Spirit America; LLS America, LLC; and LLS,
20 Canada, LLC she began shifting her payday/installment loan business toward online operations and away from
21 storefronts. By at least 2006 www.littleloanshoppe.com offered payday/installment loans to U.S. customers as well as
22 Canadian customers. Little Loan Shoppe Ltd. dissolved in January of 2006. Nelson closed the storefront offices of
23 Little Loan Shoppe America, LLC and ceased its registration to provide consumer loans in Washington by the end of
24 that same year. As of the date of this Statement of Charges, the website www.littleloanshoppe.com continues to
25 operate.

Offer and Sale of Securities

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23. Beginning no later than 2000, Little Loan Shoppe Ltd. began issuing promissory notes to individuals who loaned the company money. Nelson told these individuals that Little Loan Shoppe Ltd. was expanding and needed capital. Little Loan Shoppe Ltd. issued 1-2 year term promissory notes to investors which paid interest rates ranging from 33-60%. These notes originated primarily from Little Loan Shoppe's offices in British Columbia.

24. By 2001, Little Loan Shoppe America, LLC began issuing promissory notes to investors similar to those offered by Little Loan Shoppe Ltd. Little Loan Shoppe America, LLC's notes originated out of Washington State. Nelson told those investors that their funds would be used to fund her payday loan business.

25. From 2001 through 2008, Nelson formed and managed the following business entities which issued promissory notes similar to those of Little Loan Shoppe Ltd. and Little Loan Shoppe America, LLC: 639504 BC, Ltd.; Little Loan Shoppe Canada, LLC; 0738106 BC, Ltd.; 0738116 BC, Ltd.; 0738126 BC, Ltd.; LLS Canada, LLC (NV); LLS America, LLC; LLS-A, LLC (WA); Pacific LLS, LLC; Atlantic LLS, LLC; Eastern LLS, LLC; Central LLS, LLC; LLS-A, LLC (NV); LLS-AM, LLC; LLS-CAN, LLC; LLS-CAN-US, LLC; LLS-NW, LLC; LLS-US, LLC; and LLS-US-CAN, LLC. (Hereinafter "LLS affiliated entities").

26. Regardless of which LLS affiliated entity appeared on the promissory note, investors were told their investment would be used to expand the business or fund the operations of a payday loan company operated by Nelson called the Little Loan Shoppe (hereinafter "LLS").

27. Interest rates offered on the notes issued by LLS and the LLS affiliated entities ranged from 33%-60%. The term length of the notes varied. Earlier notes tended to be shorter terms of 1-2 years, while later notes typically lasted 5-10 years. At the end of the term investors had the option of getting their principal returned or rolling the funds over into a new promissory note.

28. Payment frequency on notes with LLS and LLS affiliated entities also varied. Early investors typically received monthly interest payments using 12 post-dated checks issued with the investor's promissory note. Later payments shifted to quarterly, semi-annual, annual, or every 20 months.

1 29. At least 300 investors had over 650 promissory notes with LLS and LLS affiliated entities totaling
2 approximately \$29 million in U.S. dollars and \$26 million in Canadian dollars.

3 30. Investors provided funds for their promissory note by wire transfer, mail, or hand delivery. Investors
4 wired funds to both Canadian and U.S. Bank accounts.

5 31. LLS affiliated entities issued at least 600 promissory notes, including at least one note for each
6 Respondent LLS entity, which contained either Nelson's signature notarized by a Washington notary public or a
7 document heading of Spokane, Washington. Dozens of investors visited the Spokane LLS offices and Nelson's home
8 in Colbert, Washington.

9 32. At least 35 residents of Washington State invested over \$6 million with LLS and LLS affiliated
10 entities. Washington residents entered into notes with one or more of the following LLS affiliated entities: Little Loan
11 Shoppe Ltd.; Little Loan Shoppe America, LLC; 639504 BC, Ltd.; Little Loan Shoppe Canada, LLC; 0738126 BC,
12 Ltd.; LLS America, LLC; LLS-A, LLC (WA); Atlantic LLS, LLC; and LLS-A, LLC (NV). At least two Washington
13 residents entered into notes in which Nelson agreed to pay the note "solely and collectively," along with three LLS
14 affiliated entities.

15 33. In addition to those entities that Washington residents invested with, non-Washington residents sent
16 funds to Spokane, Washington via wire transfer or check and received notes from at least the following LLS affiliated
17 entities: 0738106 BC, Ltd.; 0738116 BC, Ltd.; Pacific LLS, LLC; Eastern LLS, LLC; Central LLS, LLC; LLS-NW,
18 LLC; and LLS-US, LLC.

19 34. Most investors with LLS affiliated entities learned about the investment opportunity from friends or
20 family members that had previously invested. A number of investors were Jehovah's Witnesses that heard about the
21 investment from fellow Jehovah's Witnesses. Interested individuals were typically referred to Cooper or Nelson for
22 details on the investment.

23 35. Nelson consistently told investors that LLS continued to grow and was financially sound. Nelson told
24 some investors that she had a secure bank account for investor funds and told one investor that an investment with her
25

1 company was more secure than a bank. Other investors stated that Nelson claimed she had millions to back investor
2 loans and that she only loaned out approximately 30% of the funds provided by investors.

3 36. Nelson directed potential investors to www.littleloanshoppe.com to review the fees collected on
4 payday loans. Nelson said that the payday loans were capped at \$500 for any one customer and the loan terms lasted
5 only a couple of weeks. Therefore, investor funds could be used to fund multiple short term payday loans. Nelson
6 explained that she made so much interest off of the short term loans that it was easy to pay investors 40 or 60% interest
7 on their funds. Nelson also told investors that she had stringent loan guidelines for her payday loans and had access to
8 debit bank accounts to recover funds.

9 37. Nelson often promised to provide financial statements for LLS to potential investors, but never
10 delivered on those promises. Nelson told some investors that because the business was booming she was too busy to
11 provide financial statements. Some investors requested a prospectus for their investment and Nelson told those
12 individuals that only investors with over one million dollars received a prospectus.

13 38. Nelson told several investors that if they needed their principal back before maturity of their
14 investment, they could get it back immediately or with one or two months notice.

15 39. In 2008 Nelson sent out messages to existing investors that encouraged them to contact her if they or
16 their friends had interest in investing more funds. In those messages Nelson stated that LLS “defied financial gravity”
17 and “experienced substantial growth” in 2007. Nelson claimed that since American economy began slowing LLS had
18 seen an “increase in highly qualified consumers with higher income levels as well as higher payday loan credit scores.”
19 As a result Nelson claimed that LLS had a decrease in payday loan clients that defaulted on payments.

20 40. Nelson also said that she created a commercial lead company to generate payday loan leads for LLS
21 instead of paying other companies as she had done in the past. Nelson claimed that this enabled LLS to save money,
22 “significantly increase” the loans funded each day, and sell off any surplus leads to other companies.

23 41. As late as September 2008 Nelson continued to tell investors that LLS was doing well. Nelson
24 assured one investor that his funds would be safe, explaining that LLS had outstanding demand for short term loans
25 due to the company’s internet expansion.

1 42. In October 2008, LLS and the LLS affiliated entities stopped paying investors according to the terms
2 of their promissory notes. Initially Nelson offered some investors a reduced interest rate payment of 10%. Over time
3 LLS and the LLS affiliated entities failed to make even the 10% payments and all payments ceased by March 2009.

4 43. After a few months without payment some of the investors with LLS affiliated entities filed an
5 involuntary petition for Chapter 11 bankruptcy against LLS-A, LLC (WA) in July 2009. LLS America, LLC also
6 petitioned for its own Chapter 11 bankruptcy in July 2009.

7 44. At an August 27, 2009 creditor's meeting for the bankruptcy of LLS America, LLC, the Chief
8 Executive Officer for LLS America, LLC at that time, Ralph Gamble ("Gamble"), testified that LLS America did not
9 generate its own leads and still purchased leads from other companies. Gamble also testified that LLS had no
10 underwriting guidelines for payday loans when he started with the company in November of 2007. Gamble stated that
11 in 2009 LLS America, LLC wrote off \$27 million dollars in loan losses on non-performing loans that accrued from the
12 years 2007-09.

13 *Paul Cooper*

14 45. Existing investors often referred friends or family that expressed interest in investing with LLS to
15 Cooper. At least 49 investors with LLS affiliated entities gathered information about investing with LLS from Cooper,
16 including at least 3 Washington investors. Cooper told potential investors that he had successfully invested with the
17 LLS for years as one of Nelson's earliest investors. Cooper typically provided a brief history of the company and
18 Nelson. Cooper instructed investors on where to send their funds. Cooper also notified existing members when LLS
19 had open windows for new investment funds and kept a list of interested investors at times when LLS was not
20 currently accepting new investments.

21 46. Cooper provided at least two investors with documents which provided a history of a payday loan
22 company seeking investors. One document claimed that Cooper, through a British Columbia company, 0720789 BC
23 Ltd., had reached an agreement to manage investors for LLS. The other document did not specifically mention LLS,
24 but rather claimed that Cooper had an agreement to manage investors for a "payday loan company." Both documents
25 said that Nelson's default rate for payday loans ran lower than the industry average and that Nelson recovered most

1 defaulted payments through follow up contact with the debtor. One document stated that even if only 31% of the
2 outstanding payday loans got paid off all investors would be covered, while the other document claimed to need only
3 37% to cover investors. One of the documents also stated that Little Loan Shoppe’s risk of bankruptcy was very low
4 as Nelson’s debt to investors was “covered abundantly by her returns.”

5 Misrepresentations and Omissions

6 47. Respondents failed to provide material information regarding investing with LLS and LLS affiliated
7 entities, including but not limited to: financial statements, financial condition of the entities and their ability to repay
8 debts, and the business background and experience of Doris Nelson.

9 48. Respondents failed to disclose the nature of the relationships between Little Loan Shoppe Ltd.; Little
10 Loan Shoppe America, LLC; LLS America, LLC; LLS Canada LLC; and the various other LLS affiliated entities
11 which entered into promissory notes with investors.

12 49. Respondents misrepresented the risk of investment with LLS and LLS affiliated entities by telling
13 investors that LLS continued to grow, that LLS was financially sound, and by assuring investors that their funds were
14 secure and could be withdrawn with little or no notice.

15 50. Respondents failed to disclose that certain individuals received a commission or were paid a higher
16 interest rate on their own investments for referring new investment funds to LLS.

17 51. Respondents failed to disclose material information regarding the number and dollar amount of
18 outstanding notes between LLS/LLS affiliated entities and other investors.

19 Registration Status

20 52. Little Loan Shoppe Ltd. is not currently registered to sell its securities in the state of Washington and
21 has not previously been so registered.

22 53. Little Loan Shoppe America, LLC is not currently registered to sell its securities in the state of
23 Washington and has not previously been so registered.

24 54. 639504 BC, Ltd. is not currently registered to sell its securities in the state of Washington and has not
25 previously been so registered.

1 55. Little Loan Shoppe Canada, LLC is not currently registered to sell its securities in the state of
2 Washington and has not previously been so registered.

3 56. 0738106 BC, Ltd. is not currently registered to sell its securities in the state of Washington and has not
4 previously been so registered.

5 57. 0738116 BC, Ltd. is not currently registered to sell its securities in the state of Washington and has not
6 previously been so registered.

7 58. 0738126 BC, Ltd. is not currently registered to sell its securities in the state of Washington and has not
8 previously been so registered.

9 59. LLS America, LLC is not currently registered to sell its securities in the state of Washington and has
10 not previously been so registered.

11 60. LLS-A, LLC (WA) is not currently registered to sell its securities in the state of Washington and has
12 not previously been so registered.

13 61. Pacific LLS, LLC is not currently registered to sell its securities in the state of Washington and has not
14 previously been so registered.

15 62. Atlantic LLS, LLC is not currently registered to sell its securities in the state of Washington and has
16 not previously been so registered.

17 63. Eastern LLS, LLC is not currently registered to sell its securities in the state of Washington and has
18 not previously been so registered.

19 64. Central LLS, LLC is not currently registered to sell its securities in the state of Washington and has
20 not previously been so registered.

21 65. LLS-A, LLC (NV) is not currently registered to sell its securities in the state of Washington and has
22 not previously been so registered.

23 66. LLS-NW, LLC is not currently registered to sell its securities in the state of Washington and has not
24 previously been so registered.

1 67. LLS-US, LLC is not currently registered to sell its securities in the state of Washington and has not
2 previously been so registered.

3 68. Doris Nelson is not currently registered to sell her securities in the state of Washington and has not
4 previously been so registered.

5 69. Doris Nelson is not currently registered as a securities salesperson in the state of Washington and has
6 not previously been so registered.

7 70. Paul Cooper is not currently registered as a broker-dealer or securities salesperson in the state of
8 Washington and has not previously been so registered.

9
10 Based upon the Findings of Fact, the following Conclusions of Law are made:

11 **CONCLUSIONS OF LAW**

12 1. The offer and/or sale of the promissory notes described above constitute the offer and/or sale of a
13 security as defined in RCW 21.20.005(14) and (17).

14 2. Respondents Little Loan Shoppe Ltd.; Little Loan Shoppe America, LLC; 639504 BC, Ltd; Little
15 Loan Shoppe Canada, LLC; 0738106 BC, Ltd.; 0738116 BC, Ltd.; 0738126 BC, Ltd.; LLS America, LLC; LLS-A,
16 LLC (WA); Pacific LLS, LLC; Atlantic LLS, LLC; Eastern LLS, LLC; Central LLS, LLC; LLS-A, LLC (NV); LLS-
17 NW, LLC; LLS-US, LLC; and Doris Nelson each violated RCW 21.20.140, because, as set forth in the Findings of
18 Fact, Respondents offered and sold securities for which no registration was on file with the Securities Administrator.

19 3. Doris Nelson violated RCW 21.20.040 by offering and selling said securities while not registered as a
20 securities salesperson in the state of Washington.

21 4. Respondents Little Loan Shoppe Ltd.; Little Loan Shoppe America, LLC; 639504 BC, Ltd; Little
22 Loan Shoppe Canada, LLC; 0738106 BC, Ltd.; 0738116 BC, Ltd.; 0738126 BC, Ltd.; LLS America, LLC; LLS-A,
23 LLC (WA); Pacific LLS, LLC; Atlantic LLS, LLC; Eastern LLS, LLC; Central LLS, LLC; LLS-A, LLC (NV); LLS-
24 NW, LLC; LLS-US, LLC; and Doris Nelson each violated RCW 21.20.010, because, as set forth in the Findings of
25

1 Fact, Respondents untrue statements of material fact or omitted to state material facts necessary to make the statements
2 made, in light of circumstances under which they were made, not misleading.

3 **CONSENT ORDER**

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

5 IT IS AGREED AND ORDERED that Respondents, Little Loan Shoppe Ltd.; Little Loan Shoppe America,
6 LLC; 639504 BC, Ltd; Little Loan Shoppe Canada, LLC; 0738106 BC, Ltd.; 0738116 BC, Ltd.; 0738126 BC, Ltd.;
7 LLS America, LLC; LLS-A, LLC (WA); Pacific LLS, LLC; Atlantic LLS, LLC; Eastern LLS, LLC; Central LLS,
8 LLC; LLS-A, LLC (NV); LLS-NW, LLC; LLS-US, LLC; and Doris Nelson, their agents and employees each shall
9 cease and desist from violating RCW 21.20.140, the securities registration section of the Securities Act of
10 Washington.

11 IT IS FURTHER AGREED AND ORDERED that Respondents, Little Loan Shoppe Ltd.; Little Loan Shoppe
12 America, LLC; 639504 BC, Ltd; Little Loan Shoppe Canada, LLC; 0738106 BC, Ltd.; 0738116 BC, Ltd.; 0738126
13 BC, Ltd.; LLS America, LLC; LLS-A, LLC (WA); Pacific LLS, LLC; Atlantic LLS, LLC; Eastern LLS, LLC;
14 Central LLS, LLC; LLS-A, LLC (NV); LLS-NW, LLC; LLS-US, LLC; and Doris Nelson, their agents and employees
15 each shall cease and desist from violating RCW 21.20.040, the securities salesperson and broker-dealer registration
16 section of the Securities Act of Washington.

17 IT IS FURTHER AGREED AND ORDERED that Respondents, Little Loan Shoppe Ltd.; Little Loan Shoppe
18 America, LLC; 639504 BC, Ltd; Little Loan Shoppe Canada, LLC; 0738106 BC, Ltd.; 0738116 BC, Ltd.; 0738126
19 BC, Ltd.; LLS America, LLC; LLS-A, LLC (WA); Pacific LLS, LLC; Atlantic LLS, LLC; Eastern LLS, LLC;
20 Central LLS, LLC; LLS-A, LLC (NV); LLS-NW, LLC; LLS-US, LLC; and Doris Nelson, their agents and employees
21 each shall cease and desist from violating RCW 21.20.010, the anti-fraud section of the Securities Act of Washington.

22 IT IS FURTHER AGREED that the Securities Division has jurisdiction to enter this Consent Order.

23 IT IS FURTHER AGREED that Respondents, Little Loan Shoppe Ltd.; Little Loan Shoppe America, LLC;
24 639504 BC, Ltd; Little Loan Shoppe Canada, LLC; 0738106 BC, Ltd.; 0738116 BC, Ltd.; 0738126 BC, Ltd.; LLS
25 America, LLC; LLS-A, LLC (WA); Pacific LLS, LLC; Atlantic LLS, LLC; Eastern LLS, LLC; Central LLS, LLC;

1 LLS-A, LLC (NV); LLS-NW, LLC; LLS-US, LLC; and Doris Nelson, entered into this Consent Order freely and
2 voluntarily and with a full understanding of its terms and significance.

3 IT IS FURTHER AGREED that in consideration of the foregoing, Respondents, Little Loan Shoppe Ltd.;
4 Little Loan Shoppe America, LLC; 639504 BC, Ltd; Little Loan Shoppe Canada, LLC; 0738106 BC, Ltd.; 0738116
5 BC, Ltd.; 0738126 BC, Ltd.; LLS America, LLC; LLS-A, LLC (WA); Pacific LLS, LLC; Atlantic LLS, LLC; Eastern
6 LLS, LLC; Central LLS, LLC; LLS-A, LLC (NV); LLS-NW, LLC; LLS-US, LLC; and Doris Nelson, each waive
7 their rights to a hearing and judicial review of this matter pursuant to RCW 21.20.440 and Chapter 34.05 RCW.

8 WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.

9 Signed this 24th day of June 2016.

10
11 Signed by:

12
13 /s/
Doris Nelson, Individually

14
15 Signed by:
16 Little Loan Shoppe Ltd.; Little Loan Shoppe America, LLC;
17 639504 BC, Ltd.; Little Loan Shoppe Canada, LLC;
18 0738106 BC, Ltd.; 0738116 BC, Ltd.; 0738126 BC, Ltd.;
19 LLS America, LLC; LLS-A, LLC (WA); Pacific LLS, LLC;
20 Atlantic LLS, LLC; Eastern LLS, LLC; Central LLS, LLC;
21 LLS-A, LLC (NV); LLS-NW, LLC; LLS-US, LLC;

22
23 /s/
Doris Nelson, Managing Member

24 Approved as to form by:

25 /s/
Jeffrey K. Finer, Attorney for Doris Nelson
WSBA #14610

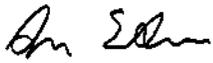
1 SIGNED and ENTERED this 8th day of August 2016.

3 

5 _____
6 William M. Beatty
7 Securities Administrator

8 Approved by:

9 Presented by:

10 

11 

12 _____
13 Suzanne Sarason
14 Chief of Enforcement

15 _____
16 Jack McClellan
17 Financial Legal Examiner