

STATE OF ILLINOIS  
SECRETARY OF STATE  
SECURITIES DEPARTMENT

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)  
IN THE MATTER OF: CASHEL PROGRAMS, ITS , )  
OFFICERS, DIRECTORS, PARTNERS, AGENTS, )  
EMPLOYEES, AFFILIATES, SUCCESSORS AND ASSIGNS.)  
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FILE NO. 1100228

ORDER OF PROHIBITION

TO RESPONDENTS:           Cashel Programs  
                                  29 West Wooster Street  
                                  Danbury, Connecticut 06810

WHEREAS, a Temporary Order of Prohibition was issued by the Secretary of State on June 28, 2011 which prohibited Cashel Programs("Respondent") from engaging in the business of loan brokering in the State of Illinois until further order of the Secretary of State or his duly authorized representative;

WHEREAS, pursuant to section 15-55(e) Illinois Loan Brokers Act of 1955 [815 ILCS 175/15-1] (the "Act"), the failure to request a hearing within thirty (30) calendar days of the entry of the Temporary Order shall constitute an admission of any acts alleged therein and constitute a sufficient basis to make the Temporary Order final;

WHEREAS, the Respondent has failed to request a hearing on the matters contained in the Temporary Order within thirty (30) calendar days of the entry of said Temporary Order and the Respondent is hereby deemed to have admitted the facts alleged in the Temporary Order;

WHEREAS, the Secretary of State, by and through his duly authorized representative, has adopted the Findings of Fact contained in the Temporary Order as the Secretary of State's Findings of fact as follows:

1. That, Respondent Cashel Programs, a business entity ("Respondent"), has a last known address of 29 Wooster Street, Danbury, Connecticut 06810.
2. That on or about March 24, 2011, Respondent, by and through its Officers, Directors, Partners, Employees, Affiliates, Successors, Agents and Assigns, offered to procure loans via the internet at <http://www.cashelprograms.com> (the "Ad"), that was viewed by at least one (1) Illinois resident (the "Borrower").

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3. That the Borrower responded to the Ad requesting a loan in the amount of Seventy-Five Hundred Dollars (\$7,500.00) and was then informed via email that he was conditionally approved and a representative of Respondent then told Borrower to wire Seven Hundred Ten Dollars (\$710.00) to be used towards first four monthly payments.
4. That on April 1, 2011 Borrower remitted the sum of Seven Hundred Ten Dollars (\$710.00) via a Western Union Money Transfer to Respondents receiver in Thornhill, Ontario, Canada as instructed.
5. That Respondent's Representative after receipt of the Seven Hundred Ten Dollars (\$710.00) called Borrower and told Borrower that due to his credit history it would be necessary for Borrower to purchase an insurance policy in the event of default or Bankruptcy covering a maximum twelve months of payments at a cost of Seven Hundred Ten Dollars (\$710.00) then borrower would receive a personal loan of Seventy-Five Hundred Dollars (\$7,500.00).
6. That on April 2, 2011 Borrower remitted the additional sum of Seven Hundred Ten Dollars (\$710.00), the balance due for the insurance policy via a Western Union Money Transfer to Respondents receiver in Thornhill, Ontario, Canada as instructed.
7. That Borrower never received a loan or the return of the One Thousand Four Hundred Twenty Dollars (\$1,420.00) advanced for the loan.
8. That the above-referenced Respondent is a loan broker as that term is defined pursuant to Section 15-5.15., of the Illinois Loan Brokers Act of 1995 [815 ILCS 175/15-1 et seq.] (the "Act").
9. That Section 15-10 of the Act provides, inter alia, that it shall be unlawful for any person to engage in the business of loan brokering unless registered under the Act.
10. That Section 15-85. of the Act provides, inter alia, that it is prohibited under the Act for a loan broker to either directly or indirectly act as a loan broker without registration under the Act unless exempt under the Act.
11. That at all times relevant hereto, Respondent, its' Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, failed to file an application for registration as a loan broker with the Secretary of State prior to the aforementioned loan offer from the State of Illinois.
12. That by virtue of the foregoing, Respondent, its' Officers, Directors, Partners Employees, Affiliates, Successors, Agents, Assigns, have violated Section 15-10 and/or 15-85(b) of the Act.

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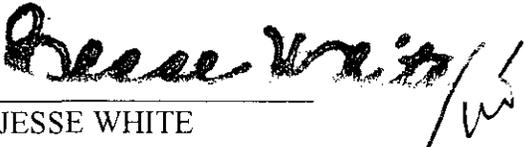
13. That Section 15-55(d) of the Act provides, inter alia, that if the Secretary of State shall find any person is acting or has acted as a loan broker as defined in Section 15-5.15 of this Act, without prior thereto or at the time thereof having complied with the registration requirements of the Act, the Secretary of State may by written order prohibit such person from acting as a loan broker in the State.

NOW THEREFORE IT IS HEREBY ORDERED THAT: pursuant to the authority granted by Section 15-55(c) and Section 15-55(d) of the Act, Cashel Programs, its Officers, Directors, Employees, Affiliates, Successors, Agents Partners and Assigns, are hereby **PROHIBITED** from engaging in the business of loan brokering in the State of Illinois until further order of the Secretary of State.

**NOTICE: Failure to comply with the terms of this Order shall be a violation of Section 15-65 of the ACT. Any person who willfully violates this act commits a class 4 felony.**

**This is a final order subject to administrative review pursuant to the Administrative Review Law [735 ILCS 5/3-101 et seq.] and the Rules and Regulations of the Act (14 Ill. Admin. Code, Ch. 1 Sec. 130.1123). Any action for judicial review must be commenced within thirty-five (35) days from the date a copy of this Order is served upon the party seeking review.**

ENTERED: This 29<sup>th</sup> day of July, 2011.

  
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JESSE WHITE  
Secretary of State  
State of Illinois

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