

STATE OF ILLINOIS
SECRETARY OF STATE
SECURITIES DEPARTMENT

IN THE MATTER OF: BENHILTON INVESTMENTS LIMITED,)
LONFORD LIMITED,)
LAW CONSORTIUM LIMITED,)
THEIR OFFICERS, DIRECTORS,) File No. 0600634
EMPLOYEES, AFFILIATES, SUCCESSORS,)
AGENTS AND ASSIGNS,)
SHEPHERD JAMES,)
CHARLES N. NENVILE,)
AND ALAN FRUM FORD)
)

TEMPORARY ORDER OF PROHIBITION

TO THE RESPONDENT: Shepherd James
 Benhilton Investments Limited
 83 Kidmore Road
 Caversham Reading
 Berkshire RG4 7NQ UK

 Alan Frum Ford, CEO
 Lonford Limited
 38 Wigmore Street
 London W1U 2HQ UK

 Charles N. Nenvile
 Law Consortium Limited
 #5 Roundstone Street
 Trowbridge, Wiltshire BA14 SDH London UK

On information and belief, I, Jesse White, Secretary of State for the State of Illinois, through my designated representative, having been fully advised in the premises by the staff of the Illinois Securities Department, Office of the Secretary of State, herein find:

1. That Respondent, Benhilton Investments Limited, is a purported business entity, with a last known address of 83 Kidmore Road, Caversham Reading, Berkshire RG4 7NQ UK;

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3. That Respondent, Law Consortium Limited, is a purported business entity, with a last known address of #5 Roundstone Street, Trowbridge, Wiltshire BA14 SDH London UK;
4. That, at all times relevant the Respondent, Shephard James, was an officer, director, agent or employee of Benhilton Investments Limited;
5. That, at all times relevant the Respondent, Alan Frum Ford, was an officer, director, agent or employee of Lonford Limited;
6. That, at all times relevant the Respondent, Charles N. Nenville, was an officer, director, agent or employee of Law Consortium Limited;
7. That on or about August 6, 2006, Respondents Benhilton Investments Limited, Lonford Limited, and Law Consortium Limited, by and through their Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, including Shephard James, Alan Frum Ford, and Charles N. Nenville, offered to procure a \$850,000 loan for TM and DM, Illinois residents, in return for fees in the total amount of \$16134.41;
8. That on or about January 10, 2007, the Secretary of State sent a written request for information to the aforesaid Respondent business entities and individuals;
9. That as of this date, the Secretary of State has not received a response from any of the aforesaid business entities or individuals;
10. That the above-referenced business entities and individuals are loan brokers 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");
11. That Section 15-85(b) 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;
12. That Section 15-10 of the Act provides, inter alia, that it shall be unlawful for any person to engage in

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the business of loan brokering unless registered under the Act;

13. That Section 15-45(a)(8) of the Act provides, inter alia, that the Secretary of State may conduct inquiries which include written requests for information and that the failure to respond to said written request for information may be deemed a violation of this Act and the Secretary of State may issue notices and orders against the violators;
14. That at all times relevant hereto, Respondents Benhilton Investments Limited, Lonford Limited, and Law Consortium Limited, by and through their Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, including Shephard James, Alan Frum Ford, and Charles N. Neville, failed to file an application for registration as a loan broker with the Secretary of State prior to the aforementioned loan offer in the State of Illinois;
15. That at all times relevant hereto, Respondents Benhilton Investments Limited, Lonford Limited, and Law Consortium Limited, by and through their Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, including Shephard James, Alan Frum Ford, and Charles N. Neville, failed to respond to written requests for information sent to them by the Secretary of State;
16. That by virtue of the foregoing, Respondents Benhilton Investments Limited, Lonford Limited, and Law Consortium Limited, by and through their Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, including Shephard James, Alan Frum Ford, and Charles N. Neville, have violated Sections 15-85(b), 15-10 and 15-45(a)(8) of the Act;
17. That Section 15-55(c) of the Act provides, inter alia, that if the Secretary of State shall find that any person has violated any provision of this Act, the Secretary of State may, by written order temporarily prohibit or suspend such person from acting as a loan broker;
18. 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

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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;

19. That based upon the foregoing, the Secretary of State deems it necessary, in order to prevent imminent and additional violations of the Act, and to prevent losses to investors as a result of the referenced prior violation of the Act, to enter an order pursuant to the authority granted under Section 15-55(c) and Section 15-55(d) of the Act which prohibits Respondents Benhilton Investments Limited, Lonford Limited, and Law Consortium Limited, by and through their Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, including Shephard James, Alan Frum Ford, and Charles N. Nenville, from acting as a loan broker in the State of Illinois; and
20. That based upon the credible evidence available to the Secretary of State, the entry of this Temporary Order is in the public interest and is consistent with the purposes of the Act.

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, Respondents Benhilton Investments Limited, Lonford Limited and Law Consortium Limited, by and through their Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, including Shephard James, Alan Frum Ford, and Charles N. Nenville, 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 is hereby given that the Respondents may request a hearing on this matter by transmitting such request in writing to Securities Director, Illinois Securities Department, 300 West Jefferson, Suite 300A, Springfield, Illinois 62702. Such request must be made within thirty (30) days of the date of entry of this Temporary Order. Upon receipt of a request for hearing, a hearing will be scheduled. Request for hearing will not stop the effectiveness of this Temporary Order and will extend the effectiveness of this Temporary Order for ninety days from the date the hearing request is received by the Department.

FAILURE BY ANY RESPONDENT TO REQUEST A HEARING WITHIN THIRTY (30) DAYS AFTER ENTRY OF THIS TEMPORARY ORDER SHALL CONSTITUTE AN

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ADMISSION OF ANY FACTS ALLEGED HEREIN AND CONSTITUTES SUFFICIENT BASIS TO MAKE THE TEMPORARY ORDER FINAL.

ENTERED: This 26^m day of March, 2007



JESSE WHITE
Secretary of State
State of Illinois

Attorney for the Secretary of State:

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