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

	IN THE MATTER OF DETERMINING)	Order No.: S-13-1198-13-SC01
3	Whether there has been a violation of the)	
	Business Opportunity Fraud Act of)	STATEMENT OF CHARGES AND NOTICE OF INTENT
4	Washington by:)	TO ENTER ORDER TO CEASE AND DESIST
)	
5	Leary Darling; Maria Sebastianna Hobbs a/k/a)	
	Anna Hobbs; Vanessa Hobbs; Money Now)	
6	Funding, LLC; US Doc Assist, LLC; and Legal		
	Dox, LLC;		
7			

Respondents.

THE STATE OF WASHINGTON TO:

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Leary Darling; Maria Sebastianna Hobbs a/k/a Anna Hobbs; Vanessa Hobbs; Money Now Funding, LLC; US Doc Assist. LLC: and Legal Dox, LLC

STATEMENT OF CHARGES

Please take notice that the Securities Administrator for the state of Washington has reason to believe that Respondents Leary Darling, Maria Sebastianna Hobbs a/k/a Anna Hobbs, Vanessa Hobbs, Money Now Funding, LLC, US Doc Assist, LLC, and Legal Dox, LLC have violated the Business Opportunity Fraud Act of Washington and that their violations justify the entry of an order of the Securities Administrator under RCW 19.110.150 against each Respondent to cease and desist from such violations. The Securities Administrator finds as follows:

TENTATIVE FINDINGS OF FACT

Respondents

1. Money Now Funding, LLC (Money Now Funding) is an Arizona limited liability company that purports to provide short term financing to businesses. Money Now Funding was formed on July 20, 2012, and conducts business through its website http://moneynowfunding.com. US Doc Assist, LLC acts as the registered agent for Money Now Funding and Luke Rose serves as a member of the limited liability company. The listed address for Money Now Funding is 3507 North Central Avenue, Suite 403, Phoenix, Arizona, 85012.

2. US Doc Assist, LLC (US Doc Assist) is an Arizona limited liability company, incorporated on January 9, 2012, that purports to help each purchaser of the Money Now Funding business opportunity prepare his or her limited liability company registration paperwork. The listed address for US Doc Assist, LLC is 3507 North Central Avenue, Suite 502, Phoenix, Arizona, 85012.

3. Legal Doxs, LLC (Legal Doxs) is an Arizona limited liability company, incorporated on May 01, 2012, that purports to register the limited liability company of each purchaser of the Money Now Funding business opportunity with the Arizona Corporation Commission. The listed address for Legal Dox is 3507 North Central Avenue, Suite 403, Phoenix, Arizona, 85012.

4. Leary Darling is an Arizona resident, and he acts as the principal of Legal Doxs and member of US Doc Assist.

5. Maria Sebastianna Hobbs a/k/a Anna Hobbs is an Arizona resident, and she serves as a member of US Doc Assist.

6. Vanessa Hobbs is an Arizona resident, and she serves as a member of US Doc Assist.

Nature of the Offering

7. In July of 2012, a Washington resident, Purchaser A, received a telephone call from a Money Now Funding representative, who offered Purchaser A the opportunity to start her own business and work from home as an agent of Money Now Funding. Specifically, the representative told Purchaser A that Money Now Funding lends money to small businesses based on the business' average merchant credit sales. The representative stated that Money Now Funding. For a fee, the Money Now Funding representative represented that Money Now Funding would provide Purchaser A with business leads and extensive training. Purchaser A declined the offer, but she continued to receive calls from Money Now Funding representatives, from whom she ultimately purchased a Money Now Funding business opportunity for \$25,000.

8. In July of 2012, Purchaser A received a call from a Money Now Funding representative who went by the name of Nicky Ross. Mr. Ross encouraged Purchaser A to pay to become an agent of Money Now Funding. For Purchaser A to become an agent, Mr. Ross stated that Money Now Funding would form a limited liability company for Purchaser A, and as an agent, Mr. Ross told Purchaser A that she would be responsible for contacting small businesses, through her own limited liability company, and encouraging them to seek loans from Money Now Funding.

9. For a \$20,499 payment to Money Now Funding, Mr. Ross represented to Purchaser A that Money Now Funding would provide Purchaser A with a number of services. Upon payment, Mr. Ross also stated that Money Now Funding would first register Purchaser A's limited liability company with the Arizona Corporation Commission and provide her with a personal account, or log-in page, through the Money Now Funding website. Through this personal account, Money Now Funding would then send Purchaser A 4,000 "leads," or the names of businesses that she could contact and attempt to have them apply for a loan from Money Now Funding. In addition to these business leads, Money Now Funding would provide Purchaser A with extensive training on how to operate her business and conduct

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sales calls. Mr. Ross told Purchaser A that if she purchased the business leads from him, then he would help her contact the listed businesses, and he stated that he would provide her with training as well.

10. Mr. Ross stated that Purchaser A could make money three different ways: Money Now Funding would pay Purchaser A \$25.00 for every business that she contacted that applied for a loan from Money Now Funding; Purchaser A would receive a percentage of the actual loan that Money Now Funding made to a small business that Purchaser A contacted; and Money Now Funding would pay Purchaser A if she recruited other people that she knew to become a Money Now Funding agent.

11. Mr. Ross encouraged Purchaser A to look through the Money Now Funding website, http://moneynowfunding.com. Under the "Opportunity" tab of the website, Money Now Funding made the following representations about working as a Money Now Funding agent: "Be your own boss," "No experience needed," and "Earn thousands monthly." This page also contained an "Income Calculator," which provided the user with his or her "Potential Monthly Income" based on the number that the user entered as the "# of business you want to refer each month."

12. Purchaser A told Mr. Ross that she could not afford to lose any money towards this business, and Mr. Ross assured Purchaser A that she could make \$2,000 a month and recoup her investment within one year.

13. On July 06, 2012, Purchaser A paid Legal Dox \$499 via credit card to establish and register her limited liability company in Arizona and to create her own personal account, or log-in page, through the Money Now Funding website. Then, on August 16, 2012, Purchaser A paid US Doc Assist via credit card a total of \$20,000 for Money Now Funding to provide her with business leads and training.

14. After these transactions, Purchaser A was able to download the list of 20,000 business leads through her account on the Money Now Funding website. Upon reviewing the business leads, Purchaser A noted that the list contained a large amount of duplicative business leads. Additionally, no one from Money Now Funding ever contacted Purchaser A to arrange for her training. Purchaser A attempted, unsuccessfully, to contact a Money Now Funding representative several times to address these issues, and she eventually requested that Money Now Funding refund her payment, but no one from Money Now Funding ever accommodated her request. The phone numbers for Money Now Funding no longer work, and Purchaser A has yet to receive a response to nearly every email that she has sent the company. Money Now Funding recently deleted Purchaser A's account on the Money now Funding website, and US Doc Assist and Legal Dox recently entered into an Assurance of Voluntary Compliance Agreement with the Oregon Department of Justice to resolve alleged violations of Oregon's Unlawful Trade Practices Act. To date, Purchaser A has yet to receive any payment from the Respondents.

Failure to Provide a Disclosure Document

15. In connection with the offer and sale of the Money Now Funding business opportunity, the Respondents all failed to provide the prospective purchaser with a disclosure document as required by RCW 19.110.070.

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Misrepresentations and Omissions

16. The Respondents failed to provide the basis or assumptions for their claim that Purchaser A could make \$2,000 a month and recoup her investment within one year or that purchasers of the Money Now Funding business opportunity could "earn thousands monthly."

17. The Respondents failed to disclose the basis upon which they claimed that they had the ability and resources to provide Purchaser A with training on how to operate Purchaser A's own business and conduct sales calls.

18. The Respondents failed to disclose the basis or assumptions underlying the claim that the business leads that Money Now Funding and US Doc Assist provided to Purchaser A would enable Purchaser A to earn money.

Registration Status

19. Respondents Leary Darling, Maria Sebastianna Hobbs a/k/a Anna Hobbs, Vanessa Hobbs, Money Now Funding, US Doc Assist, and Legal Doxs are not currently registered to sell business opportunities in the state of Washington and have not previously been so registered.

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

CONCLUSIONS OF LAW

1. The offer and sale of the Money Now Funding business opportunity as described above constitutes the offer and sale of a business opportunity as defined in RCW 19.110.020 and RCW 19.110.030.

2. The offer or sale of said business opportunities is in violation of RCW 19.110.050 because no registration for such offer and sale by Respondents Leary Darling, Maria Sebastianna Hobbs a/k/a Anna Hobbs, Vanessa Hobbs, Money Now Funding, US Doc Assist, and Legal Doxs were on file with the Securities Administrator for the time period in which the offer and sale occurred.

3. The offer and sale of this business opportunity was in violation of RCW 19.110.070 because the Respondents failed to provide prospective purchasers with the required disclosure document.

4. The offer or sale of said business opportunities were made in violation of RCW 19.110.120 because, as described above, the Respondents made untrue or misleading statements of material fact and omitted to state material facts in connection with the offer, sale, or lease of a business opportunity in Washington.

NOTICE OF INTENT TO ORDER THE RESPONDENT TO CEASE AND DESIST

Based upon the above Tentative Findings of Fact and Conclusions of Law, the Securities Administrator intends to order that Respondents Leary Darling, Maria Sebastianna Hobbs a/k/a Anna Hobbs, Vanessa Hobbs, Money Now Funding, US Doc Assist, and Legal Doxs, and its agents and employees, shall cease and desist from violations of RCW 19.110.050, RCW 19.110.070, and RCW 19.110.120.

AUTHORITY AND PROCEDURE

This Order is entered pursuant to the provisions of RCW 19.110.150 and is subject to the provisions of Chapter 34.05 RCW. Respondents Leary Darling, Maria Sebastianna Hobbs a/k/a Anna Hobbs, Vanessa Hobbs, Money Now Funding, US Doc Assist, and Legal Doxs may make a written request for a hearing as set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING accompanying this order. If a respondent does not request a hearing within the allowed time, the Securities Administrator intends to adopt the above Tentative Findings of Fact and Conclusions of Law as final and enter an order to cease and desist permanent as to that respondent.

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Signed and Entered this <u>26th</u> day of <u>June</u> 2013___.

Approved by:

Presented by:

William M. Beatty Securities Administrator

ENCORCE

Suzanne Sarason Chief of Enforcement

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Eric Palosaari Enforcement Attorney

Reviewed by:

Jack McClellan Financial Legal Examiner Supervisor

STATEMENT OF CHARGES AND NOTICE OF INTENT TO ENTER ORDER TO CEASE AND DESIST

DEPARTMENT OF FINANCIAL INSTITUTIONS Securities Division PO Box 9033 Olympia WA 98507-9033 360-902-8760

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