

**STATE OF ILLINOIS  
SECRETARY OF STATE  
SECURITIES DEPARTMENT**

---

IN THE MATTER OF: WORLDBANC FINANCIAL GROUP )  
GROUP, INC., Its Officers, Directors, Employees, Successors, Agents )  
and Assigns, and Gray Shelton, individually. )

---

File No. 0800054

**ORDER OF PROHIBITION**

TO THE RESPONDENT:

Mr. Gray Shelton  
C/o Baxter, Howard & Shelton, LLP  
d/b/a Worldbanc Financial Group, ULP  
705 East 162<sup>nd</sup> Street, Suite 203  
South Holland, Illinois 60473

Baxter, Howard & Shelton, LLP  
d/b/a Worldbanc Financial Group, ULP  
705 East 162<sup>nd</sup> Street, Suite 203  
South Holland, Illinois 60473

WHEREAS, a Temporary Order of Prohibition was issued by the Secretary of State on July 13, 2009 which prohibited Worldbanc Financial Group, ULP ("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:

## Order of Prohibition

-2-

1. That Respondent Worldbanc Financial Group, ULP ("Worldbanc") is an Ohio LP/LLP, authorized to do business in Illinois, whose last known registered address is C/o Baxter, Howard & Shelton, LLP, d/b/a Worldbanc Financial Group, ULP, 705 East 162<sup>nd</sup> Street, Suite 203, South Holland, Illinois 60473.
2. That Respondent Gray Shelton ("Shelton" together with Worldbanc "the Respondents") is an individual, listed as the managing partner and registered agent whose mailing address is C/o Baxter, Howard & Shelton, LLP, d/b/a Worldbanc Financial Group, ULP, 705 East 162<sup>nd</sup> Street, Suite 203, South Holland, Illinois 60473.
3. That on or about July 18, 2008, Worldbanc, through its representatives, its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, offered to procure a loan for at least one (1) individual (the "Borrower") in return for an advance fee of Three Thousand (\$3,000.00) Dollars, which was prepaid by the Borrower.
4. That the above-referenced business entity, Worldbanc, 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").

### **Failure to Register**

5. 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.
6. 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.
7. That at all times relevant hereto, Worldbanc Commercial Group, Inc., its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, and Gray Shelton, individually have 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.
8. That by virtue of the foregoing, Worldbanc Commercial Group, Inc., its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, and Gray Shelton, individually have violated Section 15-10 and/or 15-85(b) of the Act.

### **Failure to Respond to Request for Information**

9. That on January 21, 2009, and March 24, 2009 the Department issued duplicate letters pursuant to Section 15-45 of the Act (the "15-45(a)(2) and (8) Letter"),

Order of Prohibition

-3-

which informed Respondents that it had come to the Department's attention that Respondents had engaged in the business of Loan Brokering in Illinois. The Department advised the Respondents to file an affidavit setting forth, among other things, in part the following information:

1. Copies of all advertising and promotional literature or other documents related to the brokering of the referenced loan(s) to Illinois residents between 6 years ago and the present date.
2. A signed statement setting forth the following:
  - a. Statement detailing the manner in which prospective borrowers' names are or were obtained.
  - b. A statement detailing the manner in which prospective borrowers are or were initially contacted.
10. That Respondent Shelton acknowledged receipt of the "15-45(a)(2) and (8) Letter by placing his signature on the Postal Service Form 3811 receipt on March 26, 2009, but failed to respond to the query with an affidavit as required.
11. That Section 15-85(b)(2) of the Act provides, inter alia, that it shall be a violation for any person to fail to file with the Secretary of State any application, report or document required to be filed under the provisions of the Act or any rule or regulation made by the Secretary of State pursuant to the Act.
12. That by virtue of the foregoing, Respondents have violated Section 15-85(b)(2) of the Act.
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 authority granted by Section 15-55(c) and Section 15-55(d) of the Act, Worldbanc Financial Group, ULP, its Officers, Directors, Employees, Affiliates, Successors, Agents Partners and Assigns, and Gray Shelton individually are hereby **PROHIBITED** from engaging in the business of loan brokering in the State of Illinois until further order of the Secretary of State.


Order of Prohibition

-4-

**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 14<sup>th</sup> day of August, 2009.

  
JESSE WHITE  
Secretary of State  
State of Illinois

Attorney for the Secretary of State:

Samuel F. Freiman  
Illinois Securities Department  
69 West Washington Street, Suite 1220  
Chicago, Illinois 60602  
Telephone: (312) 793-3988