

STATE OF ILLINOIS  
SECRETARY OF STATE  
SECURITIES DEPARTMENT

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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 )

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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

WHEREAS, a Temporary Order of Prohibition was issued by the Secretary of State on March 26, 2007, prohibiting 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. Nenvile, from acting as a loan broker in the State of Illinois until further order of the Secretary of State.

WHEREAS, pursuant to Section 15-55(e) of the Illinois Loan Brokers Act of 1995 [815 ILCS 175/15-1 et seq.] (the "Act"), the failure to request a hearing within thirty days of the entry of the Temporary Order of Prohibition shall constitute a sufficient basis to make the Temporary Order final.

WHEREAS, Benhilton Investments Limited, Lonford Limited, and Law Consortium Limited, by and through their Officers, Directors,

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Employees, Affiliates, Successors, Agents and Assigns, including Shephard James, Alan Frum Ford, and Charles N. Nenville, have failed to request a hearing on the matters contained in the said Temporary Order within thirty days of the entry of said Temporary Order and are hereby deemed to have admitted the facts alleged in the said Temporary Order.

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

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;
2. That Respondent, Lonford Limited, is a purported business entity, with a last known address of 38 Wigmore Street, London W1U2HQ UK;
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;

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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)(1) 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 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

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requests for information sent to them by the Secretary of State;

16. 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;
17. 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;
18. That Section 15-55(e) of the Act provides, inter alia, that the Respondent's failure to request a hearing within 30 days after the date of the entry of the Temporary Order shall constitute an admission of any facts alleged therein and shall constitute sufficient basis to make the Temporary Order final;

WHEREAS, the Secretary of State, by and through his duly authorized representative, has adopted the Conclusions of Law contained in the said Temporary Order as the Secretary of State's final Conclusions of Law as follows:

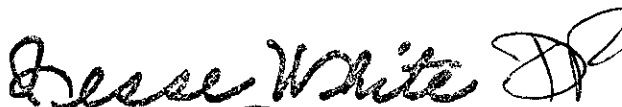
1. That by virtue of the foregoing, the Respondents, Benhilton Investments Limited, Lonford Limited, and Law Consortium Limited, by and through their Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, including Shephard James, Alan Frum Ford, and Charles N. Nenville, have violated Sections 15-10, 15-45(a)(8) and 15-85(b)(1) of the Act;
2. That by virtue of the foregoing, the 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 subject, pursuant to Sections 15-55(c), 15-55(d) and 15-55(e) of the Act, to an Order which permanently prohibits them from acting as a loan broker in the State of Illinois.

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NOW THEREFORE, IT IS HEREBY ORDERED THAT: pursuant to the authority granted by Section 15-55(c), Section 15-55(d), and Section 15-55(e) of the Act, 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 acting as a loan broker in the State of Illinois until further order of the Secretary of State.

ENTERED: This 27<sup>th</sup> day of April, 2007



Jesse White  
Jesse White  
Secretary of State  
State of Illinois

NOTICE: Failure to comply with the terms of this Order shall be a violation of the Section 15-85(b)(2) of the Act. Any person or entity who fails to comply with the terms of this Order of the Secretary of State, having knowledge of the existence of the Order, shall be guilty of 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 Illinois Securities Act, [14 Ill. Admin. Code Ch. I, Section 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.

Attorney for the Secretary of State:  
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Springfield, Illinois 62702  
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