



STATE OF MISSOURI
OFFICE OF THE SECRETARY OF STATE

IN THE MATTER OF:)	
)	
SENIOR RESOURCES, LLC.; and)	Case No. AP-07-06
BECKY HALPHIN,)	
)	
<i>Respondents.</i>)	
)	
Serve both at:)	
1110 Main Street)	
Blue Springs, MO 64015)	
)	

CONSENT ORDER

SUMMARY OF ALLEGATIONS

1. The Missouri Securities Division (“Division”) alleges that Senior Resources, LLC. (“SRL”) through its owner and manager, Becky Halphin (“Halphin”) held themselves out as an investment adviser in violation of Section 409.4-403, RSMo. (Cum. Supp. 2005).
2. Respondents and the Division desire to settle the allegations and the matters raised by the Securities Division relating to Respondents’ alleged activities.

CONSENT TO JURISDICTION

3. Respondents and the Division stipulate and agree that the Commissioner has jurisdiction over Respondent and these matters pursuant to the Missouri Securities Act, Chapter 409, *et seq.*
4. Respondents and the Division stipulate and agree that the Commissioner has authority to enter this Consent Order pursuant to Section 409.6-604(h), RSMo. (Cum. Supp. 2005), which provides:

The commissioner is authorized to issue administrative consent orders in the settlement of any proceeding in the public interest under this act.

WAIVER AND EXCEPTION

5. Respondents waive their rights to a hearing with respect to this matter.
6. Respondents waive any rights that they may have to seek judicial review or otherwise challenge or contest the terms and conditions of this Order. Respondents specifically forever release and hold harmless the Missouri Office of Secretary of State, Secretary of State, Commissioner of Securities and their respective representatives and agents from any and all liability and claims arising out of, pertaining to, or relating to this matter.
7. Respondents stipulate and agree with the Division that, should the facts contained herein prove to be false or incomplete, the Division reserves the right to pursue any and all legal or administrative remedies at its disposal.

CONSENT TO COMMISSIONER'S ORDER

8. Respondents and the Division stipulate and agree to the issuance of this Consent Order without further proceedings in this matter, agreeing to be fully bound by the terms and conditions specified herein.
9. Respondents neither admit nor deny the allegations made by the Division but consent to the Commissioner's Findings of Fact and Conclusions of Law as set forth below solely for the purposes of this proceeding and any proceeding that may be brought to enforce the terms of this Consent Order.
10. Respondents agree not to take any action or to make or permit to be made any public statement creating the impression that this Order is without a factual basis.
11. Respondents agree that Respondents are not the prevailing party in this action since the parties have reached a good faith settlement.

COMMISSIONER'S FINDINGS OF FACT AND CONCLUSIONS OF LAW

12. SRL is a Missouri limited liability company with an address at 1110 Main Street, Blue Springs, Missouri 64015.
13. Halphin is an insurance agent licensed in Missouri to sell life insurance, variable contracts, accident, health, casualty and property insurance coverage. Her business address is 1110 Main Street, Blue Springs, Missouri 64015. Halphin is an owner and manager of SRL.
14. Records maintained by the Division indicate that SRL has never been registered as a broker-dealer or investment adviser in the State of Missouri.
15. Halphin was registered as a securities agent in the State of Missouri with Princor

Financial Services Corporation from January 3, 2002, through December 30, 2004. Halphin has not been registered as a securities agent in the State of Missouri since that time. In addition, Halphin has never been registered as an investment adviser representative in the State of Missouri.

16. On July 27, 2006, Halphin sent correspondence to a Missouri resident (MR1) on SRL's letterhead. In addition to the firm name, address, and telephone number, the letterhead included the following language:

“Financial Planning Services for Individuals Age 60 +” and a banner across the bottom of the letter that stated as follows: “**MUTUAL FUNDS** [emphasis added] ANNUITIES LONG TERM CARE LIFE HEALTH [sic].”

17. Respondents claim that the letterhead was inadvertently sent from older paper stock.
18. The Commissioner has jurisdiction over these matters pursuant to the Missouri Securities Act of 2003, Chapter 409, *et seq.*
19. The Commissioner has authority to enter this Consent Order pursuant to Section 409.6-604(h), RSMo, Supp. 2005, which provides that the Commissioner is authorized to issue administrative consent orders in the settlement of any proceeding in the public interest under this act.
20. This Order is in the public interest.

ORDER

WHEREAS, the Commissioner, after consideration of the stipulations set forth above and on the consent of Respondents and the Division, finds the following Order to be in the public interest and necessary for the protection of public investors and consistent with the provisions of Chapter 409, RSMo, *et seq.*

NOW, THEREFORE, it is hereby Ordered that:

1. Respondent SRL will review all materials used by its representatives to ensure that these materials are not misleading prior to any dissemination of this information to the public. Respondents will send to the Division, within ten (10) days of the effective date of this order, a copy of the revised SRL letterhead and banner to be used in correspondence with its customers.
2. Respondents shall pay to the Missouri Investor Education and Protection Fund the amount of two thousand five hundred dollars (\$2,500.00); one thousand seven hundred dollars of this payment will be suspended provided that Respondents comply with the terms of this order. The remaining eight hundred dollars (\$800.00) shall

be sent to the Division and shall be made payable to the Missouri Secretary of State's Investor Education and Protection Fund and shall be due and payable within thirty (30) days from the date of this Consent Order. The Division will forward these funds to the Investor Education and Protection Fund.

3. The suspended payment in paragraph 2 above shall become immediately payable, under operation of law, upon Respondents' failure to comply with the terms of this order, and such immediately due payments shall be in addition to all other penalties then available under the law; and
4. Respondents will reimburse the Division for the costs of the investigation in the amount of two hundred dollars (\$200). This amount shall be sent to the Division and shall be made payable to the Missouri Secretary of State's Investor Education and Protection Fund and shall be due and payable within thirty (30) days from the date of this Consent Order. The Division will forward these funds to the Investor Education and Protection Fund.
5. Respondents will be responsible for their own costs and attorney fees.

SO ORDERED:

WITNESS MY HAND AND OFFICIAL SEAL OF MY OFFICE AT JEFFERSON CITY, MISSOURI, THIS 2 DAY OF ^{July MDC} ~~JANUARY~~, 2007.



ROBIN CARNAHAN
SECRETARY OF STATE

Matthew D. Kitzi
MATTHEW D. KITZI
COMMISSIONER OF SECURITIES

Consented to by:

Mary Hosmer
Mary Hosmer
Assistant Commissioner of Securities
Missouri Securities Division

Senior Resources, LLC
Becky Halphin
Becky Halphin individually and on behalf of SRL

Approved as to Form

David Halphin
David Halphin