

State of Missouri
Office of Secretary of State

Case No. AP-05-45

IN THE MATTER OF:

Senior Resources, L.L.C.
1110 Main Street
Blue Springs, Missouri 64015;

Becky Halphin
28906 SE Moreland School Rd.
Blue Springs, Missouri 64014

Respondents.

CONSENT ORDER

1. The Missouri Securities Division alleges that Senior Resources, L.L.C., ("Senior Resources") and Becky Halphin engaged in unregistered activity and that this constitutes grounds for discipline pursuant to Section 409.4-403 RSMo Cum. Supp. 2004.
2. As referred to in this Consent Order Senior Resources and Becky Halphin shall be defined as "Respondents."
3. Respondents hereby neither admit or deny the allegations and the matters raised by the staff of the Securities Division relating to the alleged violation of Missouri Securities Laws but agree to settle any and all claims and matter raised herein.
4. Respondents and the Securities Division consent to the issuance of the Consent Order.
5. Respondents 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.
6. Respondents waive their right to a hearing with respect to this matter.
7. Respondents stipulate and agree that they waive any rights that they may have to seek judicial review or otherwise challenge or contest the terms and conditions of this Order.
8. Respondents stipulate and agree that, should the facts contained herein prove to be false or incomplete, the Missouri Division of Securities preserves the right to pursue any and all legal or administrative remedies at its disposal.

STIPULATIONS OF FACT

9. Senior Resources is a Missouri Limited Liability Company whose address is 1110 Main Street, Blue Springs, Missouri 64015.
10. Becky Halphin is a Missouri resident whose business address is 28906 SE Moreland School Road, Blue Springs, Missouri 64104.
11. Senior Resources is not registered as an investment advisor firm in Missouri.
12. Becky Haphin is not registered as an investment advisor representative in Missouri.
13. On October 27, 2005, Chief Registration Counsel, Philip Toben, took the sworn statement of Becky Halphin regarding the alleged investment advisory activities of Senior Resources and Becky Halphin.
14. Respondent Senior Resources via Stuart Speer invoiced Ms. Winifred E. House on October 27, 2004 for services related to insurance products. Respondents did not receive any compensation from Ms. Winifred E. House on said invoice.
15. Respondents have given advice to past and current clients regarding information as to different products available to them and information as to where their money should be allocated to meet their specific goals.
16. Respondents have published written materials that provide specific information to past and current clients regarding investments, although the Respondents have not received money for this service.

JURISDICTIONAL BASIS

1. Respondents and the Securities Division stipulate and agree that the Commissioner has jurisdiction over these matters pursuant to the Missouri Securities Act, Chapter 409, et al.

2. Respondents and the Securities Division stipulate and agree that the Commissioner has authority to enter this Consent Order pursuant to §409.6-604(h), RSMo Cumulative Supp. 2004, which provides:

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

ORDER

WHEREAS, the Commissioner, after consideration of the stipulation set forth above and on consent of the Respondent and the Securities Division, finds the following Order to be in the public interest, necessary for the protection of public investors and consistent with the provisions of the Missouri Securities Act.

NOW, THEREFORE, it is hereby Ordered that:

1. Respondents are prohibited from conducting business as an investment adviser and employing investment adviser representatives pursuant to §§409.4-403 and 409.4-404, RSMo Cumulative Supp. 2004 until becoming registered in the State of Missouri.
2. Respondents shall pay one thousand dollars (\$1,000.00) to the Missouri Secretary of State's Investor Education and Protection Fund. Such amount shall be immediately due and payable.
3. Respondents shall pay their own costs and attorneys fees with respect to this matter with the exception of the travel and mileage reimbursement provided by the State to Respondents, which Respondents agree to having received.

SO ORDERED:

WITNESS MY HAND AND OFFICIAL SEAL OF MY OFFICE AT JEFFERSON CITY, MISSOURI THIS 21ST DAY OF DECEMBER, 2005

ROBIN CARNAHAN
SECRETARY OF STATE

(Signed/Sealed)
MATTHEW D. KITZI
ACTING COMMISSIONER
OF SECURITIES

Consented to by:

Philip Toben
Chief Registration Counsel
Missouri Division of Securities