

STATE OF ILLINOIS  
SECRETARY OF STATE  
SECURITIES DEPARTMENT

---

IN THE MATTER OF: TREND MANAGEMENT GROUP, INC., )  
TREND CAPITAL, LLC, )  
TREND GROUP, INC., ) File No. 0700002  
THEIR OFFICERS, DIRECTORS, )  
EMPLOYEES, AFFILIATES, SUCCESSORS, )  
AGENTS AND ASSIGNS, )  
AND RAYMOND LOREN DENTON )

---

CONSENT ORDER

TO THE RESPONDENT: Raymond Loren Denton (CRD # 2030749)  
C/O Bernard G. Segatto, Esq.  
Barber Segatto Hoffee Wilke and Cate  
P.O. Box 79  
Springfield, Illinois 62705-0079

WHEREAS, Respondent Raymond Loren Denton, (the "Respondent") on October 15, 2008, executed a certain Stipulation To Enter Consent Order (the "Stipulation"), which hereby is incorporated by reference herein.

WHEREAS, by means of the Stipulation, the Respondent has admitted to the jurisdiction of the Secretary of State and service of the Notice of Hearing in this matter and the Respondents have consented to the entry of this Consent Order.

WHEREAS, the Secretary of State, by and through his designated representative, the Securities Director, has determined that the matter related to the aforesaid formal hearing may be dismissed without further proceeding.

WHEREAS, the Respondent has acknowledged, while neither admitting or denying the truth thereof, that the allegations contained in paragraph seven (7) of the Stipulation shall be adopted as the Secretary of State's Findings of Fact as follows:

1. That Respondent, Raymond Loren Denton, is an individual with a last known address of 4306 Grand Ave., Joplin, Missouri 64804;
2. That on or about June 9, 2004, the Respondent, Raymond Loren Denton, offered and sold to EH, an Illinois resident, a membership agreement and "Certificate of Participation" for

Consent Order

-2-

- a total amount of \$100,000; that in return for said investment, EH would receive an investment return of 8.15% annually for 60 months;
3. That on or about August 3, 2004, the Respondent, Raymond Loren Denton, offered and sold to LD, an Illinois resident, a membership agreement and "Certificate of Participation" for a total amount of \$25,000; that in return for said investment, LD would receive an investment return of 8.15% annually for 60 months;
  4. That on or about June 17, 2004, the Respondent, Raymond Loren Denton, offered and sold to EG, an Illinois resident, a membership agreement and "Certificate of Participation" for a total amount of \$17,094; that in return for said investment, EG would receive an investment return of 8.15% per annum for 60 months;
  5. That on or about September 14, 2004, the Respondent, Raymond Loren Denton, offered and sold to JK, an Illinois resident, a membership agreement and "Certificate of Participation" for a total amount of \$30,000; that in return for said investment, JK would receive an investment return of 8.15% annually for 60 months;
  6. That on or about August 23, 2004, the Respondent, Raymond Loren Denton, offered and sold to MC, an Illinois resident, a membership agreement and "Certificate of Participation" for a total amount of \$30,000; that in return for said investment, MC would receive an investment return of 8.15% annually for 60 months;
  7. That on or about August 12, 2004, the Respondent, Raymond Loren Denton, offered and sold to HC, an Illinois resident, a membership agreement and "Certificate of Participation" for a total amount of \$10,000; that in return for said investment, HC would receive an investment return of 8.15% annually for 60 months;
  8. That the Respondent represented that the purchase of the aforementioned membership agreement and "Certificate of Participation" purportedly allowed the investor to participate in the profits of Trend Management Group, Inc., Trend Capital, LLC, and/or Trend Group, Inc., whose business included the purchase of credit card debt for pennies on the dollar and the subsequent collection on said credit card

Consent Order

-3-

debt, the profits from which would fund and/or pay for the aforementioned investment returns;

9. That each of the aforementioned "Certificate of Participation" is an investment contract and therefore is a security as that term is defined pursuant to Section 2.1. of the Illinois Securities Law of 1953 [815 ILCS 5/1 et seq.] (the "Act");
10. That Section 5 of the Act provides, inter alia, that all securities except those exempt under Section 3 of the Act or those offered and sold in transactions exempt under Section 4 of the Act shall be registered with the Secretary of State prior to their offer or sale in the State of Illinois;
11. That Section 12.A of the Act provides, inter alia, that it shall be a violation of the Act for any person to offer or sell securities except in accordance with the provisions of the Act;
12. That Section 12.D of the Act provides, inter alia, that it shall be a violation of the Act for any person to fail to file with the Secretary of State any document or application required to be filed under the provision of the Act;
13. That at all times relevant hereto, the Respondent, Raymond Loren Denton, failed to file an application for registration of the above-referenced securities with the Secretary of State prior to their offer or sale in the State of Illinois;
14. That Section 11.E(2) of the Act provides, inter alia, that if the Secretary of State shall find that any person has violated subsection D of Section 12 of the Act, the Secretary of State may by written order prohibit the person from offering or selling any securities in this State;
15. That Section 11.E(3) of the Act provides, inter alia, that if the Secretary of State shall find that any person is engaging or has engaged in the business of selling or offering for sale securities as a dealer or salesperson without prior thereto and at the time thereof having complied with the registration or notice filing requirements of this Act, the Secretary of State may by written order prohibit the person from offering or selling any securities in this State;

Consent Order

-4-

16. That Section 11.E(4) of the Act provides, inter alia, that if the Secretary of State, after finding that any provision of the Act has been violated, may impose a fine as provided by rule, regulation or order not to exceed \$10,000.00 for each violation of the Act, as well as the costs of investigation and reasonable expenses;
17. That by virtue of the foregoing, the Respondent, Raymond Loren Denton, is subject to a fine of up to \$10,000.00 per violation, costs of investigation, reasonable expenses, an order of censure, and an order which permanently prohibits the Respondent from offering or selling securities in the State of Illinois.

WHEREAS, the Respondent has acknowledged, while neither admitting or denying the truth thereof, that the allegations contained in paragraph eight (8) of the Stipulation shall be adopted as the Secretary of State's Conclusions of Law as follows:

1. That by virtue of the foregoing, the Respondent, Raymond Loren Denton, has violated Sections 12.A and 12.D of the Act;
2. That by virtue of the foregoing, the Respondent, Raymond Loren Denton, is subject to an Order which permanently prohibits him from offering and/or selling securities in the State of Illinois.

WHEREAS, the Respondent shall pay a total of \$12,725.64 to the receiver of Trend, Peter S. Davis (hereinafter, "Receiver"), said sum reflecting the initial total of the 6% commission which Respondent received as a result of the sale of the aforesaid investment contracts to the following Illinois investors: James Keaster in the amount of \$1,800, Merle Cane in the amount of \$1,800, Eddie Howard in the amount of \$6,000, Harry Clark in the amount of \$600, Louise Davis in the amount of \$1,500, and Edith Gerry in the amount of \$1,025.64; said payment is to be made as follows: Respondent shall, within 30 days of the entry of the aforesaid Consent Order, pay an initial payment of \$6,000 to the aforesaid Receiver, and will pay to the Receiver the remaining balance in 9 monthly payments of \$747.29 to be paid by the end of each month following the month that the aforesaid initial payment was made for a period of 9 months, that each payment is to be made by certified cashier's check payable to Peter S. Davis, Receiver of Trend, and sent to Peter S. Davis, Simon Consulting

Consent Order


-5-

LLC, The Great American Tower, 3200 North Central, Suite 850, Phoenix, Arizona 85012, and that a copy of said payment check will be mailed in a timely manner to Illinois Department of Securities, 350 Seright, Suite C, Harrisburg, Illinois 62946;

NOW THEREFORE IT IS HEREBY ORDERED THAT:

1. The foresaid allegations contained in the Stipulation shall be and are hereby adopted as the Secretary of State's Findings of Fact and Conclusions of Law;
2. The Respondent shall be permanently prohibited from offering and/or selling securities in the State of Illinois;
3. The Respondent shall pay a total of \$12,725.64 to the receiver of Trend, Peter S. Davis (hereinafter, "Receiver"), said sum reflecting the initial total of the 6% commission which Respondent received as a result of the sale of the aforesaid investment contracts to the following Illinois investors: James Keaster in the amount of \$1,800, Merle Cane in the amount of \$1,800, Eddie Howard in the amount of \$6,000, Harry Clark in the amount of \$600, Louise Davis in the amount of \$1,500, and Edith Gerry in the amount of \$1,025.64; said payment is to be made as follows: Respondent shall, within 30 days of the entry of the aforesaid Consent Order, pay an initial payment of \$6,000 to the aforesaid Receiver, and will pay to the Receiver the remaining balance in 9 monthly payments of \$747.29 to be paid by the end of each month following the month that the aforesaid initial payment was made for a period of 9 months, that each payment is to be made by certified cashier's check payable to Peter S. Davis, Receiver of Trend, and sent to Peter S. Davis, Simon Consulting LLC, The Great American Tower, 3200 North Central, Suite 850, Phoenix, Arizona 85012, and that a copy of said payment check will be mailed in a timely manner to Illinois Department of Securities, 350 Seright, Suite C, Harrisburg, Illinois 62946;

ENTERED: This 15<sup>th</sup> day of October, 2008.

Jesse White   
JESSE WHITE

Consent Order

-6-

Secretary of State  
State of Illinois

NOTICE: Failure to comply with the terms of this Order shall be a violation of Section 12(D) of the Illinois Securities Law of 1953 [815 ILCS 5] (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 this Order, shall be guilty of a Class 4 felony.

Attorney for the Secretary of State  
Johan Schripsema  
Illinois Securities Department  
350 Seright, Suite C  
Harrisburg, Illinois 62946  
Telephone: (618) 253-2007

Hearing Officer:  
Jon K. Ellis  
Attorney at Law  
1035 South 2<sup>nd</sup> Street  
Springfield, Illinois 62704