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**STATE OF WASHINGTON  
DEPARTMENT OF FINANCIAL INSTITUTIONS  
SECURITIES DIVISION**

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| IN THE MATTER OF DETERMINING                  | ) | Order No.: S-13-1198-13-FO01                 |
| Whether there has been a violation of the     | ) |                                              |
| Business Opportunity Fraud Act of             | ) |                                              |
| Washington by:                                | ) | ENTRY OF FINDINGS OF FACT AND CONCLUSIONS    |
|                                               | ) | OF LAW AND FINAL ORDER TO CEASE AND DESIST   |
| Leary Darling ; US Doc Assist, LLC; and Legal | ) | AS TO LEARY DARLING, US DOC ASSIST, LLC, AND |
| Dox, LLC,                                     | ) | LEGAL DOX, LLC                               |

Respondents.

On June 26, 2013, the Securities Administrator of the state of Washington issued order number S-13-1198-13-SC01, a Statement of Charges and Notice of Intent to Enter Order to Cease and Desist (Statement of Charges) against Leary Darling, Maria Sebastianna Hobbs a/k/a Anna Hobbs, Vanessa Hobbs, Money Now Funding, LLC, US Doc Assist, LLC, and Legal Dox, LLC.

The Statement of Charges, together with a Notice of Opportunity to Defend and Opportunity for Hearing, (Notice of Opportunity for Hearing) and an Application for Adjudicative Hearing (Application for Hearing) were served on Leary Darling, US Doc Assist, LLC, and Legal Dox, LLC on July 1, 2013.

On July 22, 2013, the Securities Division received an Application for Hearing from Leary Darling. Respondent Leary Darling, individually and on behalf of US Doc Assist, LLC and Legal Dox, LLC, waived the right to a hearing in this matter, and in lieu thereof, submitted a written statement for consideration by the Securities Administrator.

After considering the written statement, the Securities Administrator will adopt as final the following Findings of Fact and Conclusions of Law as set forth in the Statement of Charges and enter a final order against Respondents Leary Darling, US Doc Assist, LLC, and Legal Dox, LLC to cease and desist from violations of the Business Opportunity Fraud Act of the state of Washington:

**FINDINGS OF FACT**

Respondents

1. Money Now Funding, LLC (Money Now Funding) is an Arizona limited liability company that purports to provide short term financing to businesses. Money Now Funding was formed on July 20, 2012, and conducts business through its website <http://moneynowfunding.com>. US Doc Assist, LLC acts as the registered agent for Money Now

1 Funding and Luke Rose serves as a member of the limited liability company. The listed address for Money Now  
2 Funding is 3507 North Central Avenue, Suite 403, Phoenix, Arizona, 85012.

3 2. US Doc Assist, LLC (US Doc Assist) is an Arizona limited liability company, incorporated on January 9,  
4 2012, that purports to help each purchaser of the Money Now Funding business opportunity prepare his or her limited  
5 liability company registration paperwork. The listed address for US Doc Assist, LLC is 3507 North Central Avenue,  
6 Suite 502, Phoenix, Arizona, 85012.

7 3. Legal Doxs, LLC (Legal Doxs) is an Arizona limited liability company, incorporated on May 01, 2012, that  
8 purports to register the limited liability company of each purchaser of the Money Now Funding business opportunity  
9 with the Arizona Corporation Commission. The listed address for Legal Dox is 3507 North Central Avenue, Suite 403,  
10 Phoenix, Arizona, 85012.

11 4. Leary Darling is an Arizona resident, and he acts as the principal of Legal Doxs and member of US Doc  
12 Assist.

13 5. Maria Sebastiana Hobbs a/k/a Anna Hobbs is an Arizona resident, and she serves as a member of US Doc  
14 Assist.

15 6. Vanessa Hobbs is an Arizona resident, and she serves as a member of US Doc Assist.

#### 16 Nature of the Offering

17 7. In July of 2012, a Washington resident, Purchaser A, received a telephone call from a Money Now Funding  
18 representative, who offered Purchaser A the opportunity to start her own business and work from home as an agent of  
19 Money Now Funding. Specifically, the representative told Purchaser A that Money Now Funding lends money to  
20 small businesses based on the business' average merchant credit sales. The representative stated that Money Now  
21 Funding would pay Purchaser A to put small businesses in contact with Money Now Funding. For a fee, the Money  
22 Now Funding representative represented that Money Now Funding would provide Purchaser A with business leads and  
23 extensive training. Purchaser A declined the offer, but she continued to receive calls from Money Now Funding  
24 representatives, from whom she ultimately purchased a Money Now Funding business opportunity for \$25,000.

25 8. In July of 2012, Purchaser A received a call from a Money Now Funding representative who went by the name  
of Nicky Ross. Mr. Ross encouraged Purchaser A to pay to become an agent of Money Now Funding. For Purchaser A  
to become an agent, Mr. Ross stated that Money Now Funding would form a limited liability company for Purchaser  
A, and as an agent, Mr. Ross told Purchaser A that she would be responsible for contacting small businesses, through  
her own limited liability company, and encouraging them to seek loans from Money Now Funding.

9. For a \$20,499 payment to Money Now Funding, Mr. Ross represented to Purchaser A that Money Now  
Funding would provide Purchaser A with a number of services. Upon payment, Mr. Ross also stated that Money Now  
Funding would first register Purchaser A's limited liability company with the Arizona Corporation Commission and  
provide her with a personal account, or log-in page, through the Money Now Funding website. Through this personal

1 account, Money Now Funding would then send Purchaser A 4,000 “leads,” or the names of businesses that she could  
2 contact and attempt to have them apply for a loan from Money Now Funding. In addition to these business leads,  
3 Money Now Funding would provide Purchaser A with extensive training on how to operate her business and conduct  
4 sales calls. Mr. Ross told Purchaser A that if she purchased the business leads from him, then he would help her  
5 contact the listed businesses, and he stated that he would provide her with training as well.

6 10. Mr. Ross stated that Purchaser A could make money three different ways: Money Now Funding would pay  
7 Purchaser A \$25.00 for every business that she contacted that applied for a loan from Money Now Funding; Purchaser  
8 A would receive a percentage of the actual loan that Money Now Funding made to a small business that Purchaser A  
9 contacted; and Money Now Funding would pay Purchaser A if she recruited other people that she knew to become a  
10 Money Now Funding agent.

11 11. Mr. Ross encouraged Purchaser A to look through the Money Now Funding website,  
12 <http://moneynowfunding.com>. Under the “Opportunity” tab of the website, Money Now Funding made the following  
13 representations about working as a Money Now Funding agent: “Be your own boss,” “No experience needed,” and  
14 “Earn thousands monthly.” This page also contained an “Income Calculator,” which provided the user with his or her  
15 “Potential Monthly Income” based on the number that the user entered as the “# of business you want to refer each  
16 month.”

17 12. Purchaser A told Mr. Ross that she could not afford to lose any money towards this business, and Mr. Ross  
18 assured Purchaser A that she could make \$2,000 a month and recoup her investment within one year.

19 13. On July 06, 2012, Purchaser A paid Legal Dox \$499 via credit card to establish and register her limited  
20 liability company in Arizona and to create her own personal account, or log-in page, through the Money Now Funding  
21 website. Then, on August 16, 2012, Purchaser A paid US Doc Assist via credit card a total of \$20,000 for Money Now  
22 Funding to provide her with business leads and training.

23 14. After these transactions, Purchaser A was able to download the list of 20,000 business leads through her  
24 account on the Money Now Funding website. Upon reviewing the business leads, Purchaser A noted that the list  
25 contained a large amount of duplicative business leads. Additionally, no one from Money Now Funding ever contacted  
Purchaser A to arrange for her training. Purchaser A attempted, unsuccessfully, to contact a Money Now Funding  
representative several times to address these issues, and she eventually requested that Money Now Funding refund her  
payment, but no one from Money Now Funding ever accommodated her request. The phone numbers for Money Now  
Funding no longer work, and Purchaser A has yet to receive a response to nearly every email that she has sent the  
company. Money Now Funding recently deleted Purchaser A’s account on the Money now Funding website, and US  
Doc Assist and Legal Dox recently entered into an Assurance of Voluntary Compliance Agreement with the Oregon  
Department of Justice to resolve alleged violations of Oregon’s Unlawful Trade Practices Act. To date, Purchaser A  
has yet to receive any payment from the Respondents.

Failure to Provide a Disclosure Document

15. In connection with the offer and sale of the Money Now Funding business opportunity, the Respondents all failed to provide the prospective purchaser with a disclosure document as required by RCW 19.110.070.

Misrepresentations and Omissions

16. The Respondents failed to provide the basis or assumptions for their claim that Purchaser A could make \$2,000 a month and recoup her investment within one year or that purchasers of the Money Now Funding business opportunity could “earn thousands monthly.”

17. The Respondents failed to disclose the basis upon which they claimed that they had the ability and resources to provide Purchaser A with training on how to operate Purchaser A’s own business and conduct sales calls.

18. The Respondents failed to disclose the basis or assumptions underlying the claim that the business leads that Money Now Funding and US Doc Assist provided to Purchaser A would enable Purchaser A to earn money.

Registration Status

19. Respondents Leary Darling, Maria Sebastiana Hobbs a/k/a Anna Hobbs, Vanessa Hobbs, Money Now Funding, US Doc Assist, and Legal Doxs are not currently registered to sell business opportunities in the state of Washington and have not previously been so registered.

Based upon the above Findings of Fact, the following Conclusions of Law are made:

**CONCLUSIONS OF LAW**

1. The offer and sale of the Money Now Funding business opportunity as described above constitutes the offer and sale of a business opportunity as defined in RCW 19.110.020 and RCW 19.110.030.

2. The offer or sale of said business opportunities is in violation of RCW 19.110.050 because no registration for such offer and sale by Respondents Leary Darling, Maria Sebastiana Hobbs a/k/a Anna Hobbs, Vanessa Hobbs, Money Now Funding, US Doc Assist, and Legal Doxs were on file with the Securities Administrator for the time period in which the offer and sale occurred.

3. The offer and sale of this business opportunity was in violation of RCW 19.110.070 because the Respondents failed to provide prospective purchasers with the required disclosure document.

4. The offer or sale of said business opportunities were made in violation of RCW 19.110.120 because, as described above, the Respondents made untrue or misleading statements of material fact and omitted to state material facts in connection with the offer, sale, or lease of a business opportunity in Washington.

**FINAL ORDER**

Based upon the foregoing:

1 IT IS HEREBY ORDERED that Respondent Leary Darling ; US Doc Assist, LLC; and Legal Dox, LLC,  
2 their agents and employees, each shall cease and desist from offering or selling business opportunities in violation of  
3 RCW 19.110.050, the registration section of the Business Opportunity Fraud Act of the state of Washington.

4 IT IS HEREBY ORDERED that Respondent Leary Darling ; US Doc Assist, LLC; and Legal Dox, LLC,  
5 their agents and employees, each shall cease and desist from violating RCW 19.110.070, the disclosure document  
6 section of the Business Opportunity Fraud Act of the state of Washington.

7 IT IS FURTHER ORDERED that Respondent Leary Darling ; US Doc Assist, LLC; and Legal Dox, LLC,  
8 their agents and employees, each shall cease and desist from violating RCW 19.110.120, the anti-fraud section of the  
9 Business Opportunity Fraud Act of the state of Washington.

10 This Order is entered pursuant to RCW 19.110.150 and is subject to the provisions of Chapter 34.05 RCW.

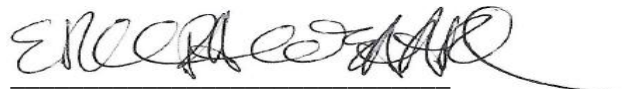
11 WILLFUL VIOLATION  
12 OF THIS ORDER IS A CRIMINAL OFFENSE.

13 SIGNED and ENTERED this 2nd day of August 2013.

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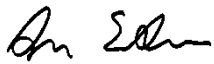
15 \_\_\_\_\_  
16 William M. Beatty  
17 Securities Administrator

18 Presented by:

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20 \_\_\_\_\_  
21 Eric Palosaari  
22 Enforcement Attorney

23 Approved by:

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25 \_\_\_\_\_  
26 Suzanne Sarason  
27 Chief of Enforcement

28 Reviewed by:

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30 \_\_\_\_\_  
31 Jack McClellan  
32 Financial Legal Examiner Supervisor