

1 **STATE OF WASHINGTON**  
2 **DEPARTMENT OF FINANCIAL INSTITUTIONS**  
3 **SECURITIES DIVISION**

4 IN THE MATTER OF DETERMINING  
Whether there has been a violation of the  
Securities Act of Washington by:

Order No. S-20-3041-21-CO01

CONSENT ORDER

5 Lasting Connections, LLC;  
6 Lasting Connections Matchmaking App LLC;  
Sameera Sullivan;

7 Respondents.

8 THE STATE OF WASHINGTON TO:

Lasting Connections, LLC  
Lasting Connections Matchmaking App LLC  
Sameera Sullivan (a/k/a Sameera Abdulaziz)

10 **INTRODUCTION**

11 Pursuant to the Securities Act of Washington, RCW 21.20, the Securities Division of the Department  
12 of Financial Institutions (“Securities Division”) and Respondents Lasting Connections, LLC; Lasting  
13 Connections Matchmaking App LLC; and Sameera Sullivan do hereby enter into this Consent Order in  
14 settlement of the matters alleged herein. Respondents Lasting Connections, LLC; Lasting Connections  
15 Matchmaking App LLC; and Sameera Sullivan neither admit nor deny the Findings of Fact and Conclusions  
16 of Law as stated below.

17 **FINDINGS OF FACT**

18 **Respondent**

19 1. Lasting Connections, LLC (“Lasting Connections”) was an Oregon limited liability company  
20 formed on April 18, 2012. The CEO and manager of Lasting Connections was Sameera Sullivan. Lasting  
21 Connections was in the business of providing “elite matchmaking services” for wealthy individuals and  
22 professionals. Lasting Connections used business addresses in Lake Oswego, Oregon; Houston, Texas; and  
23 New York City, New York. Last Connections was dissolved in 2019.

CONSENT ORDER

DEPARTMENT OF FINANCIAL INSTITUTIONS  
Securities Division  
PO Box 9033  
Olympia, WA 98507-9033  
360-902-8760

2. Lasting Connections Matchmaking App LLC was a Delaware limited liability company formed on or about August 31, 2015. In 2016, Lasting Connections Matchmaking App LLC filed an application to transact business in the state of Oregon. Lasting Connections Matchmaking App LLC’s principal place of business was in Portland, Oregon. On October 12, 2017, the State of Oregon administratively revoked Lasting Connections Matchmaking App LLC’s authority to transact business in Oregon. Lasting Connections Matchmaking App LLC was dissolved in 2017.

3. Sameera Sullivan (a/k/a Sameera Abdulaziz) is the founder and CEO of Lasting Connections and Lasting Connections Matchmaking App LLC. Sullivan previously resided in Portland, Oregon.

### **Overview**

4. In 2015, Sullivan raised a total of \$50,000 from two Washington residents. Sullivan’s business, Lasting Connections, provided private matchmaking services for wealthy individuals and charged between \$25,000 to \$100,000 for a package of services. After launching an app for her business, Sullivan sold two \$25,000 investments in a newly-formed entity named Lasting Connections Matchmaking App, LLC. As described below, each Washington investor received a 1.25% membership interest in Lasting Connections Matchmaking App, LLC and a written guarantee from Lasting Connection. The Washington residents were both passive investors and relied on Sullivan to generate a return on their investments.

### **Nature of the Conduct**

5. In July 2015, Sullivan solicited a resident of Bellingham, Washington and sent him an email with the subject line “Letter of Investment.” Sullivan’s email stated that Lasting Connections had recently launched a free new app that was “revolutionary” and designed to “change the world of online dating forever.” For \$299 per month, an app user could become a “premier” member and work one-on-one with one of Lasting Connection’s matchmakers. The matchmaker would interview potential matches and also conduct background checks and income verification.

1           6. Sullivan stated that the app had just gone “live” and that she was looking for investors.  
2 Sullivan stated that she was looking for an investment of \$100,000 for a 5% stake in the company. In her  
3 email, Sullivan made misleading profit projections. Sullivan represented that an investment of \$100,000  
4 would be paid back within six months and the investor would subsequently receive a “quarterly profit-  
5 sharing payout every quarter going forward after that.” Sullivan provided the investor with a “Projected  
6 Budget” showing the number of paying subscribers increasing exponentially from 150 in August 2015 to  
7 more than 22,000 in October 2016. Similarly, the budget projected that “Gross Revenue For Month” would  
8 increase from \$44,850 in August 2015 to \$6,578,000 in October 2016. Sullivan failed to provide any  
9 financial statements or reasonable basis for these projections.

10           7. Sullivan also provided the Washington investor with a Lasting Connections Business Plan  
11 that was dated July 2015. The business plan stated that investor would share in 2.5% of the profits for every  
12 \$50,000 that was invested. The business plan misleadingly stated that the “company will be turning a  
13 profit” by October 2015 (approximately three months later) and that the company’s first quarterly profit-  
14 sharing distribution would occur in January 2016. The Respondents failed to provide any reasonable basis  
15 for these projections and failed to disclose the assumptions underlying the projections.

16           8. In August 2015, the Washington investor met with Sullivan at an office in Portland, Oregon.  
17 A 22-year-old resident of Washington also attended the meeting and later invested most of his life savings  
18 in the company. The 22-year-old investor was neither accredited nor sophisticated in financial matters or  
19 investments.

20           9. After the meeting, Sullivan provided each of the Washington investors with a limited liability  
21 company purchase agreement and a limited liability company agreement. Sullivan did not provide the  
22 Washington investors with a private placement memorandum (“PPM”) or other disclosure document  
23 containing material information regarding the business, including detailed information regarding its

1 operational history, such as the number of app users and paying subscribers. The Respondents also failed  
2 provide any current or historical financial statements for Lasting Connections, or any written disclosure  
3 regarding the general and specific risks of the investment.

4 10. Sullivan also executed a misleading document that was captioned “Guarantee from Lasting  
5 Connections LLC.” The Guarantee stated that the investor would receive a “return at least equal to its  
6 investment within two years” of the date of the Guarantee. The Respondents failed to disclose the basis for  
7 its ability to guarantee full repayment of the investment within two years. The Respondents failed to  
8 disclose material information regarding the financial condition of the Lasting Connections Matchmaking  
9 App, LLC or Lasting Connections, LLC.

10 11. Sullivan provided the Washington investors with wire instructions for a bank account in the  
11 name of Lasting Connections, and both investors wired \$25,000 to the account. Prior to the deposit of these  
12 funds, the bank account had a prior balance of approximately \$115. In her July 2015 email, Sullivan stated  
13 that investor funds were “specifically earmarked” for payroll expenses, advertising campaigns on Google,  
14 Facebook, and in print publications, for “PR Campaign Strategies” and “Basic Overhead/Operating  
15 Expenses” for three months. The same day as the deposit, Sullivan transferred \$50,000 to another bank  
16 account in the name of Lasting Connections, and a total of \$17,500 was later transferred back into the  
17 account. Sullivan failed to disclose that investor funds would be commingled with other funds and used  
18 for other undisclosed purposes, including a withdrawal in the amount of \$10,720 and a \$3,000 check written  
19 to an individual with the notation “Reimbursement.”

20 12. Following their investments, the Washington investors requested copies of financial  
21 statements, but they were not provided to the investors. In February 2016, one of the Washington investors  
22 requested repayment of his investment, but Sullivan declined the request. In April 2016, the company’s  
23 accountant reported that Lasting Connections Matchmaking App had lost more than \$47,000 in 2015. In

1 October 2016, Sullivan represented to an investor that she would begin making payments to him by  
2 December 2016, but no payment was ever made. In February 2017, Sullivan sent another email to the  
3 investor and represented that she would repay him \$3,000 to \$5,000 by March 10, 2017. On March 9, 2017,  
4 Sullivan sent an email stating that she would be “transferring funds tomorrow.” When no payment was  
5 received, the investor asked for full repayment of his investment. In March 2017, Sullivan sent an email to  
6 investors stating that the app business had “taken a tremendous hit financially” and that Lasting Connections  
7 and Lasting Connections Matchmaking App both had “zero value or assets.” The Washington investors  
8 have not received any returns on their investments.

### 9 **Registration Status**

10 13. Lasting Connections, LLC is not currently registered to sell its securities in the state of  
11 Washington and has not previously been so registered, nor has it filed a claim of exemption from  
12 registration.

13 14. Lasting Connections Matchmaking App, LLC is not currently registered to sell its securities  
14 in the state of Washington and has not previously been so registered, nor has it filed a claim of exemption  
15 from registration.

16 15. Sameera Sullivan is not currently registered as a securities salesperson or broker-dealer in the  
17 state of Washington and has not previously been so registered.

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

### 19 **CONCLUSIONS OF LAW**

20 1. The offer and/or sale of the investments described above constitutes the offer and/or sale of a  
21 security as defined in RCW 21.20.005(14) and (17).  
22  
23

1           2.    Lasting Connections, LLC; Lasting Connections Matchmaking App, LLC; and Sameera  
2 Sullivan have violated RCW 21.20.140, by offering and/or selling securities for which no registration is on  
3 file with the Securities Administrator.

4           3.    Sameera Sullivan violated RCW 21.20.040 by offering and/or selling said securities while not  
5 being registered as a securities salesperson or broker-dealer in the state of Washington.

6           4.    Lasting Connections, LLC; Lasting Connections Matchmaking App, LLC; and Sameera  
7 Sullivan have violated RCW 21.20.010 by making untrue statements of material fact or omitting to state  
8 material facts necessary to make the statements made, in light of the circumstances in which they were  
9 made, not misleading.

10           Based upon the foregoing and finding it in the public interest:

11                                 **CONSENT ORDER**

12           IT IS AGREED AND ORDERED that Respondents Lasting Connections, LLC; Lasting Connections  
13 Matchmaking App LLC; and Sameera Sullivan, and their agents, and employees each shall cease and desist  
14 from violating RCW 21.20.140.

15           IT IS AGREED AND ORDERED that Respondent Sameera Sullivan, and her agents, and employees  
16 each shall cease and desist from violating RCW 21.20.040.

17           IT IS AGREED AND ORDERED that Respondents Lasting Connections, LLC; Lasting Connections  
18 Matchmaking App LLC; and Sameera Sullivan, and their agents, and employees each shall cease and desist  
19 from violating RCW 21.20.010.

20           IT IS FURTHER AGREED AND ORDERED that Respondents Lasting Connections, LLC; Lasting  
21 Connections Matchmaking App LLC; and Sameera Sullivan shall be liable for and shall pay a fine of \$1,500  
22 on or before the entry of this Consent Order.

1 IT IS FURTHER AGREED AND ORDERED that Respondents Lasting Connections, LLC; Lasting  
2 Connections Matchmaking App LLC; and Sameera Sullivan, shall be liable for and shall pay investigative  
3 costs of \$3,500, which shall be due on or before April 1, 2021.

4 IT IS FURTHER AGREED that the Securities Division has jurisdiction to enter this Consent Order.

5 IT IS FURTHER AGREED that Respondents Lasting Connections, LLC; Lasting Connections  
6 Matchmaking App LLC; and Sameera Sullivan entered into this Consent Order freely and voluntarily and  
7 with a full understanding of its terms and significance.

8 IT IS FURTHER AGREED that in consideration of the foregoing, Respondents Lasting Connections,  
9 LLC; Lasting Connections Matchmaking App LLC; and Sameera Sullivan, each waive their right to a hearing  
10 and to judicial review of this matter pursuant to RCW 21.20.440 and Chapter 34.05 RCW.

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

12  
13 Signed this 15th day of March 2021.

14 Signed by:	Signed by:
15 Lasting Connections, LLC	Lasting Connections Matchmaking App LLC
16	
17 <u>/s/</u>	<u>/s/</u>
18 Sameera Sullivan, CEO	Sameera Sullivan, CEO

19 Signed by:  
20 /s/  
21 Sameera Sullivan, Individually

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SIGNED and ENTERED this 17th day of March, 2021.



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William M. Beatty  
Securities Administrator

Approved by:



\_\_\_\_\_  
Suzanne Sarason  
Chief of Enforcement

Presented by:



\_\_\_\_\_  
Robert Kondrat  
Financial Legal Examiner