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JACK D. LADD
MEMBER

SSB Docket No. 02-10

IN THE MATTER OF
STARCASH, INC.;
JEANNE LECLERCQ;
KIP MARSIQUE; BILL HARRISON;
LINDA BULLARD; AND LINK, INC.

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Order No. CDO-1455

TO: Starcash, Inc.
5355 Town Center Road
Suite 102
Boca Raton, Florida 33486
and
c/o Kenneth J. Dunn, Esq.
Registered Agent
11575 Heron Bay Blvd., Suite 309
Coral Springs, Florida 33076

Jeanne Leclercq
5355 Town Center Road
Suite 102
Boca Raton, Florida 33486

Bill Harrison
5355 Town Center Road
Suite 102
Boca Raton, Florida 33486

Kip Marsique
5355 Town Center Road
Suite 102
Boca Raton, Florida 33486

Link, Inc.
315 S. E. 3 Avenue
Hallandale, Florida 33009

Linda Bullard
315 S. E. 3 Avenue
Hallandale, Florida 33009

EMERGENCY CEASE AND DESIST ORDER

This is your OFFICIAL NOTICE of the issuance by the Deputy Securities Commissioner of the State of Texas ("Deputy Securities Commissioner") of an EMERGENCY CEASE AND DESIST ORDER pursuant to Section 23-2 of The Securities Act, TEX. REV. CIV. STAT. ANN. art. 581-1 et seq. (Vernon 1964 & Supp. 2002) ("Texas Securities Act").

The Staff of the Enforcement Division ("the Staff") of the Texas State Securities Board ("the Securities Board") has presented evidence sufficient for the Deputy Securities Commissioner to find that:

FINDINGS OF FACT

1. Starcash, Inc. ("Respondent Starcash") is a Florida corporation whose last known address is 5355 Town Center Road, Suite 102, Boca Raton, Florida 33486. Records of the Florida Department of State, Division of Corporations, reflect a principal and mailing address of 6278 North Federal Highway, Suite 432, Ft. Lauderdale, Florida 33308, and Kenneth J. Dunn, Esq., 11575 Heron Bay Boulevard, Suite 309, Coral Springs, Florida, as its registered agent.
2. Jeanne Leclercq ("Respondent Leclercq") is an individual who at all times material to this Order has been President of Respondent Starcash and whose last known business address is the same as Respondent Starcash.
3. Kip Marsique ("Respondent Marsique") is an individual whose position is currently believed to be Vice President of Sales and Marketing for Respondent Starcash and whose last known business address is the same as Respondent Starcash.
4. Bill Harrison ("Respondent Harrison") is an individual who may be served with this Order at the business address of Respondent Starcash.
5. Linda Bullard ("Respondent Bullard") is an individual whose last known business address is 315 S. E. 3 Avenue, Hallandale, Florida 33009.
6. Link, Inc. ("Respondent Link") is an entity doing business in Florida with a business address of 315 S. E. 3 Avenue, Hallandale, Florida 33009.
7. In or about February, 2002, until April, 2002, Respondents Starcash, Leclercq, and Marsique, through telephone solicitors who identified themselves as "Bill Harrison" and "Linda Bullard" and through e-mails, have offered for sale in Texas investments described as interests in the accounts receivable of Respondent Starcash. The offering materials state that Respondent Starcash is in the business of creating deferred deposits, also known as payday advances, for the general public. The offering materials state that investments made with the company are extremely secure. Investor returns are represented as 30% annually if monthly payments of 2.5% are received by investors or 35% if payments are received annually. The offering materials include an Accounts Receivable Agreement which states that Respondent Leclercq is President of Respondent Starcash. During a solicitation of a Texas resident by Respondent Bullard, Respondent Bullard stated that Respondent Marsique was a principal of Respondent Starcash. Respondent Marsique has previously been named in cease and desist orders, as described below, as the Vice-President of Sales and Marketing for Respondent Starcash. Respondent Bullard is acting as a sales agent of Respondent Link.
8. Respondents failed to disclose, in the above-referenced e-mails and telephone calls, the material fact that a Summary Order to Cease and Desist, Revoking Exemptions, and Notice of Intent to Impose Fines and Order Affirmative Relief was issued against Respondent Starcash, Respondent Leclercq, Frederick Shapiro, Steven

Searson, and Respondent Marsique by the State of Washington, Department of Financial Institutions, Securities Division on January 24, 2002, finding that they offered and/or sold securities while no registration for such offer and/or sale was on file with the Securities Division of the State of Washington; offered and/or sold securities while not registered as securities salespersons or as broker/dealers with the Securities Division of the State of Washington; made representations in connection with the offer and/or sale of securities regarding the guaranteed return, security of the investment, and projection of future sales growth that had no reasonable basis in fact; and omitted material facts in their offerings that made the statements made in those offerings misleading.

9. Respondents failed to disclose, in the above-referenced e-mails and telephone calls, the material fact that a Summary Order to Cease and Desist was issued against Respondent Starcash, Respondent Leclercq, Frederick Shapiro, Steven Searson, and Respondent Marsique by the Pennsylvania Securities Commission on January 25, 2002, alleging that Pennsylvania Respondents offered for sale unregistered securities; the Starcash website did not contain the disclosure set forth in Commission Regulation 203.190, 64 Pa. Code Section 203.190; and engaged in, and were about to engage in, acts and practices which violate the Pennsylvania Securities Act of 1972.
10. For the period April 1, 1997, to the present, the records of the Securities Board fail to reflect that any securities issued by Respondent Starcash have been registered by qualification, notification or coordination and further fail to reflect that a permit has been granted for the sale of such securities in Texas.
11. Respondents Starcash, Leclercq, Marsique, Bullard, and Link are not registered with the Securities Commissioner to sell securities in Texas.

CONCLUSIONS OF LAW

1. The investments offered by Respondents are securities as defined by Section 4.A of the Texas Securities Act.
2. Respondents violated Section 7 of the Texas Securities Act by offering for sale in Texas the above-described securities.
3. Respondents Starcash, Link, Leclercq, Marsique and Bullard violated Section 12 of the Texas Securities Act by dealing in securities without registration with the Securities Commissioner and through the use of agents unregistered to sell securities in the State of Texas.
4. Respondents have made offers of securities in Texas that are materially misleading or otherwise likely to deceive the public through failing to disclose in their offering materials, provided to at least one Texas resident, the information contained in Findings of Fact, paragraphs 8 and 9.

5. Respondents' conduct, acts and practices threaten immediate and irreparable harm to the public.
6. The foregoing violations constitute bases for the issuance of an Emergency Cease and Desist Order pursuant to Section 23-2 of the Texas Securities Act.

ORDER

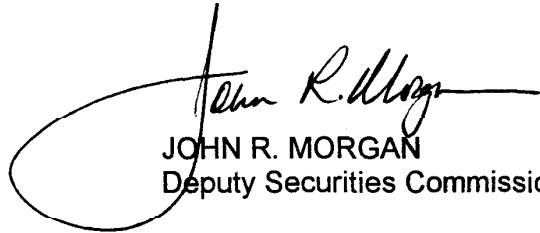
1. It is therefore ORDERED that Respondents immediately CEASE AND DESIST from offering securities to Texas residents until the securities have been registered with the Securities Commissioner or an available exemption is utilized.
2. It is further ORDERED that Respondents, referred to in Findings of Fact, paragraph 11, immediately CEASE AND DESIST from dealing in securities until they are registered with the Securities Commissioner or an available exemption is utilized.
3. It is further ORDERED that Respondents immediately CEASE AND DESIST from offering securities to Texas residents through the use of fraud or through an offer containing a statement that is materially misleading or otherwise likely to deceive the public.

NOTICE

Under Section 23-2 of the Texas Securities Act, you may request a hearing before the 31st day after the date you were served with this Order. The request for a hearing must be in writing, directed to the Securities Commissioner, stating the grounds for the request to set aside or modify the order. Failure to request a hearing will result in the order becoming final and nonappealable.

You are advised under Section 29.D of the Texas Securities Act that any knowing violation of an order issued by the Securities Commissioner under the authority of Section 23-2 of the Act is a criminal offense punishable by a fine of not more than \$5,000, or imprisonment in the penitentiary for not more than two years, or by both fine and imprisonment.

SIGNED AND ENTERED by the Deputy Securities Commissioner this 5th day of April, 2002.


JOHN R. MORGAN
Deputy Securities Commissioner