

**STATE OF ILLINOIS  
SECRETARY OF STATE  
SECURITIES DEPARTMENT**

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**IN THE MATTER OF:** )  
**CLAYTON COLLATERAL ADVISORS, INC.** )  
**and THOMAS HANLEY and ROBERT T. TRUMPY** ) **FILE NO. 1100302**  
**agents, their partners, officers and directors,** )  
**employees, affiliates, successors and assigns** )

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**TEMPORARY ORDER OF PROHIBITION**

**TO RESPONDENTS:** Thomas Hanley  
60 West Magnolia Drive  
Streamwood, Illinois 60107

Robert T Trumpy  
115 Calvin Drive  
Springfield, Illinois 62704

Clayton Collateral Advisors, Inc.  
60 West Magnolia Drive  
Streamwood, Illinois 60107

On information and belief, I, Jesse White, Secretary of State for the State of Illinois, through my designated representative, who has been fully advised in the premises by the staff of the Securities Department, Office of the Secretary of State, herein find :

1. That Respondent Thomas Hanley (hereinafter at times "Hanley" or collectively with Robert T. Trumpy and Clayton Collateral Advisors, Inc. "Respondents"), has a last known address of 60 West Magnolia Drive, Streamwood, Illinois 60107
2. That Respondent Robert T Trumpy (hereinafter at times "Trumpy" or collectively with Hanley and Clayton Collateral Advisors, Inc., "Respondents") has a last known address of 115 Calvin Drive, Springfield, Illinois 62704.
3. That Respondent Clayton Collateral Advisors, Inc. (hereinafter "Clayton, Inc." or collectively with Hanley and Trumpy "Respondents" at all relevant herein, was an Illinois corporation (dissolved 3/11/2011) located at 60 West Magnolia Drive, Streamwood, Illinois 60107.
4. That on or about May 3, 2010 Respondents, acting within the State of Illinois, agreed to locate and procure a loan ("Loan") for at least one client ("Client"), and accepted prepaid fees totaling \$75,000 paid by the client to Respondents.

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5. That Respondents agreed with the Client to broker a transaction that would result in the Loan to the Client in the amount of \$350,000,000.
6. That the activities set forth in paragraphs 3- 5 are those of a "loan broker", as those terms are defined in Section 15-5.15(a) of the Illinois Loan Brokers Act of 1995 [815 ILCS 175/15-1 *et seq.*], (the "Act").
7. That Section 15-10 of the Act provides, *inter alia*, that it shall be unlawful for any person to engage in the business of loan brokering unless registered under the Act
8. That Respondents Thomas Hanley and Robert T. Trumpy and Clayton Collateral Advisors, Inc. were not registered with the Secretary of State as loan brokers as required by the Act prior to engaging in the business of loan brokering in the State of Illinois.
9. That by virtue of the foregoing, Respondents Thomas Hanley, Robert T Trumpy and Clayton Collateral Advisors, Inc. have violated Sections 15-10 of the Act.
10. That Section 15-55 (d) of the Act provides, *inter alia*, that "if the Secretary of State shall find that any person is acting or has acted as a loan broker as defined in Section 15-5.15 of this Act, without prior thereto or at the time thereof having complied with the registration requirements of this Act, the Secretary of State may by written order prohibit such person from acting as a loan broker in this State".

### FRAUD

11. That Respondents failed to procure the Loan for the Client, and failed to return the \$75,000 prepaid fee to the Client.
12. That instead of procuring the Loan for the Client or returning the \$75,000 to the Client, Respondents converted and used the money for their own personal and business purposes
13. That Section 15-85 (a) of the Act provides, *inter alia*, that it is prohibited by the Act for a loan broker, in connection with a contract for the services of a loan broker, to either directly or indirectly employ any device, scheme or article to defraud, made any untrue statements of material fact, or engage in any act, practice or course of business that operates or would operate as a fraud or deceit upon any person.
14. That by virtue of the foregoing, Respondents Thomas Hanley and Robert T. Trumpy and Clayton Collateral Advisors, Inc. have violated Sections 15-85 (a) of the Act.
15. That Section 15-55(c) of the Act provided, *inter alia*, that if the Secretary of State shall find that any person has violated any provision of the Act, the Secretary of

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State may, by written Order, temporarily prohibit or suspend such person from acting as a loan broker

16. That based upon the foregoing, the Secretary of State deems it necessary, in order to prevent imminent and additional violations of the Act, and to prevent losses to investors as a result of the referenced prior violation of the Act, to enter an order pursuant to the authority granted under Section 15-55(c) and Section 15-55(d) of the Act which prohibits Thomas Hanley and Robert T. Trumpy and Clayton Collateral Advisors, Inc. their Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns from acting as a loan broker in the State of Illinois.

17. That based upon the credible evidence available to the Secretary of State, the entry of this Temporary Order is in the public interest and is consistent with the purposes of the Act

NOW THEREFORE, IT IS HEREBY ORDERED THAT: pursuant to the authority granted by Section 15-55 (c) and Section 15-55(d) of the Act, Respondents Thomas Hanley and Robert T Trumpy and Clayton Collateral Advisors, Inc. their Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, are hereby **PROHIBITED** from engaging in the business of loan brokering in the State of Illinois until further order of the Secretary of State.

NOTICE is hereby given that the Respondent may request a hearing on this matter by transmitting such request in writing to Securities Director, Illinois Securities Department, 69 West Washington Street, Suite 1220, Chicago, Illinois 60602 Such request must be made within thirty (30) days of the date of entry of this Temporary Order. Upon receipt of a request for hearing, a hearing will be scheduled. Request for hearing will not stop the effectiveness of this Temporary Order and will extend the effectiveness of this Temporary Order for ninety days from the date the hearing request is received by the Department.

FAILURE BY ANY RESPONDENT TO REQUEST A HEARING WITHIN THIRTY (30) DAYS AFTER ENTRY OF THIS TEMPORARY ORDER SHALL CONSTITUTE AN ADMISSION OF ANY FACTS ALLEGED HEREIN AND CONSTITUTES SUFFICIENT BASIS TO MAKE THE TEMPORARY ORDER FINAL.

Dated. This 30<sup>th</sup> day of April 2013.



JESSE WHITE

Secretary of State  
State of Illinois

Attorney for the Secretary of State:  
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