

BEFORE THE  
DIVISION OF SECURITIES  
DEPARTMENT OF FINANCIAL INSTITUTIONS  
STATE OF WISCONSIN

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In the Matter of  
QUICK CASH ADVANCE, INC.,  
QUICK CASH ADVANCE OF MIAMI, LLC,  
CASH TODAY USA, KAYCO PROMOTIONS, INC.,  
CURTIS J. BILLUPS, JOHN P. SQUIRES,  
JOHN W. LONG, MARK HARRELL, TOM ELIAS,  
JASON DICKEY, and MICHAEL HOLLINGSWORTH,

PETITION FOR ORDER

Respondents.

File No. S-00231(EX)

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The staff of the Enforcement Unit, Bureau of Registration & Enforcement, of the Division of Securities, Department of Financial Institutions, State of Wisconsin has conducted an investigation in this matter pursuant to sec. 551.56, Wis. Stats. and as a result thereof alleges as follows:

1. Quick Cash Advance, Inc. ("QCA") is a foreign business entity with a last known business address of 2155 E. University Dr., #210, Tempe, AZ 85281
2. Quick Cash Advance of Miami, LLC ("QCA Miami") is a foreign business entity with a last known business address at that of QCA.
3. Cash Today USA, Inc. ("USA") is a foreign business entity with a last known business address of 5701 Margate Blvd., Margate, FL 33073-3613
4. Kayco Promotions, Inc. ("Kayco") is a foreign business entity with a last known business address of 2300 W. Sample Rd., Pompano Beach, FL 33073.
5. Curtis J. Billups ("Billups") is an individual who at all times material hereto has been President of QCA, with a last known business address at that of 2155 E. University Dr., #210, Tempe, AZ 85281 and a last known residence address of 51089 W. Papago Rd., Maricopa, AZ 85239.
6. John P. Squires ("Squires") is an individual who at all times material hereto has been an owner and controlling person of QCA, with a last known business address at that of QCA.
7. John W. Long ("Long") is an individual who at all times material hereto has been President of USA, with a last known business address at that of USA.
8. Mark Harrell ("Harrell") is an individual who at all times material hereto has been a principal and controlling person of Kayco, with a last known business address at that of Kayco.
9. Tom Elias ("Elias") is an individual who at all times material hereto has been an agent of QCA, QCA Miami, Billups, and Squires, with a last known business address at that of QCA.

10. Jason Dickey ("Dickey") is an individual who at all times material hereto has been an agent of QCA, QCA Miami, Billups, and Squires, with a last known business address at that of QCA.
11. Michael Hollingsworth ("Hollingsworth") is an individual who at all times material hereto has been an agent of USA, Kayco, Billups, Long, and Harrell, with a last known business address at that of Kayco.
12. During the period of September and October 2000, Elias and Dickey, on behalf of QCA, Billups, and Squires, offered to at least one person in Wisconsin "units" of QCA Miami.
13. Pursuant to the offering materials received by persons in Wisconsin, QCA will engage in the non-banking services business.
14. Upon information and belief, investors can play a passive role in the company with no duties and responsibilities.
15. Upon information and belief, each investor will not be involved in the day-to-day management of QCA, since there are too many investors for them to each have any meaningful input, and they do not have the expertise or experience necessary to perform its duties.
16. Since the investors will be involved in a common enterprise with the expectation of profits to be derived from the essential managerial efforts of others, the "units" offered by QCA are investment contracts as defined by section DFI-Sec. 1.02(6)(a), Wis. Adm. Code, and are therefore securities as defined by sec. 551.02(13), Wis. Stats.
17. During the period of May 2001, Hollingsworth, on behalf of USA, Kayco, Billups, Long, and Harrell, offered to at least one person in Wisconsin "accounts receivable purchase agreements."
18. Pursuant to the offering materials received by persons in Wisconsin, USA will engage in the business of public retail lending.
19. Upon information and belief, investors can play a passive role in the company with no duties and responsibilities.
20. Upon information and belief, each investor will not be involved in the day-to-day management of USA, since there are too many investors for them to each have any meaningful input, and they do not have the expertise or experience necessary to perform its duties.
21. Since the investors will be involved in a common enterprise with the expectation of profits to be derived from the essential managerial efforts of others, the "agreements" offered by USA are investment contracts as defined by section DFI-Sec. 1.02(6)(a), Wis. Adm. Code, and are therefore securities as defined by sec. 551.02(13), Wis. Stats.
22. The QCA and USA investment contracts have never been registered for offer and sale in Wisconsin pursuant to Ch. 551, Wis. Stats.
23. All Respondents have violated sec. 551.21(1), Wis. Stats., by offering unregistered securities in Wisconsin.

24. In connection with the offers of the securities described above, Kayco transacted business in Wisconsin as a "broker-dealer," as that term is defined by sec. 551.02(3), Wis. Stats.
25. At no time has Kayco been licensed as a securities broker-dealer pursuant to Ch. 551, Wis. Stats.
26. Respondent Kayco has violated sec. 551.31(1), Wis. Stats., by transacting business in Wisconsin as a broker-dealer without a license.
27. In connection with the offers of the securities described above, Elias and Dickey transacted business in Wisconsin as "agents" for QCA, as that term is defined by sec. 551.02(2), Wis. Stats.
28. At no time have Elias and Dickey been licensed as securities agents pursuant to Ch. 551, Wis. Stats.
29. In connection with the offers of the securities described above, Hollingsworth transacted business in Wisconsin as an "agent" for USA, as that term is defined by sec. 551.02(2), Wis. Stats.
30. At no time has Hollingsworth been licensed as a securities agent pursuant to Ch. 551, Wis. Stats.
31. Elias, Dickey, and Hollingsworth have violated sec. 551.31(1), Wis. Stats., by transacting business in Wisconsin as securities agents without a license.
32. QCA, QCA Miami, USA, Kayco Billups, Squires, Long, and Harrell have violated sec. 551.31(2), Wis. Stats., by employing an unlicensed agent to represent them in Wisconsin.
33. On February 26, 2001, the State of Illinois, issued an Administrative Order against QCA and Billups, based on allegations of securities law violations.
34. On August 11, 1999, the State of Pennsylvania, issued an Administrative Order against Billups, based on allegations of securities law violations.
35. On July 21, 1999, the State of South Dakota, issued an Administrative Order against Billups, based on allegations of securities law violations.
36. In connection with the offer of the securities described in Paragraphs 12 and 17, the Respondents omitted to disclose the issuance of the orders referred to in Paragraphs 32 through 34.
37. All Respondents have violated sec. 551.41(2), Wis. Stats., by omitting to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they are made, not misleading, in connection with the offer and sale of securities to persons in Wisconsin.
38. The Private Placement Memorandum of QCA of Miami, dated July 1, 2000, received by a person in Wisconsin states: "Quick Cash Advance of Miami, L.L.C. . . . is a Florida limited liability company of which Quick Cash Advance, Inc., a Nevada corporation, is the managing member . . ."

