

**ADMINISTRATIVE PROCEEDING
BEFORE THE
SECURITIES COMMISSIONER OF SOUTH CAROLINA**

IN THE MATTER OF:)	
)	CONSENT ORDER
NJ Holdings, LLC (d/b/a Coast to Coast)	
Business Funding), Nickolas Godfrey,)	
and Jennifer Godfrey,)	File No. 15053
)	
<u>Respondents.</u>)	

WHEREAS, the Securities Division of the Office of the Attorney General of the State of South Carolina (the “Division”), pursuant to authority granted in the South Carolina Uniform Securities Act of 2005 (the “Act”), S.C. Code Ann. § 35-1-101 *et. seq.* (Supp. 2012), initiated an investigation into certain activities by the parties named above (the “Respondents”); and

WHEREAS, in connection with its investigation, the Division determined that the Respondents engaged, were engaging, or were about to engage in certain acts constituting violations of the Act, and the Division issued an Order to Cease and Desist against the Respondents for these alleged violations; and

WHEREAS, the Respondents, without admitting or denying the factual allegations of the Order to Cease and Desist, except as to the Securities Commissioner’s (the “Commissioner”) jurisdiction over them and the subject matter of these proceedings, which are admitted, acknowledge their desire to resolve the Order to Cease and Desist by Consent Order rather than by exercising their rights to a formal hearing before the Commissioner; and

WHEREAS, the Respondents have confessed judgment to investors; and

WHEREAS, the Respondents agree to the investor protections and remedies set forth below; and

WHEREAS, the Commissioner finds the investor protections and remedies in this Consent Order both appropriate and in the public interest for the protection of the investors and

the capital markets of the State of South Carolina;

NOW, THEREFORE, it is **HEREBY ORDERED**, and the Respondents expressly consent and agree that:

- A. Effective immediately, the Respondents, every successor, affiliate, control person, agent, servant, and employee of the Respondents, and every entity owned, operated, or indirectly or directly controlled by or on behalf of the Respondents will continue to **CEASE AND DESIST** from engaging in the acts set forth in the Order to Cease and Desist;
- B. Respondents Nickolas and Jennifer Godfrey, jointly and severally, will pay a civil penalty in the amount of three hundred thousand dollars (\$300,000) to the Division; and
- C. Effective immediately, the Respondents, every successor, affiliate, control person, agent, servant, and employee of the Respondents, and every entity owned, operated, or indirectly or directly controlled by or on behalf of the Respondents are permanently barred from participating in any aspect of the securities industry in or from the State of South Carolina.

Upon execution by the Commissioner, this Order resolves Administrative Proceeding 15053.

The parties to this Consent Order agree that the Consent Order does not and should not be interpreted to waive any (i) criminal cause of action, (ii) private cause of action that may have accrued to any investor(s), (iii) action of any kind in any type of bankruptcy proceeding(s), or (iv) other causes of action which may result from any activity of the Respondents not detailed above or which may hereafter arise.

IT IS SO ORDERED this 12 day of May, 2016.

By: Alan Wilson
Alan Wilson
Securities Commissioner
State of South Carolina

WE CONSENT:

Securities Division of the Office of the Attorney General:

By: Taylor Faw
Taylor Faw
Assistant Attorney General
Securities Division

Date: 5/12/16

Respondents:

NJ HOLDINGS, LLC (D/B/A COAST TO COAST BUSINESS FUNDING)

By: Nickolas Godfrey
Nickolas Godfrey
Co-Manager

Date: 5/5/16

By: Jennifer Godfrey
Jennifer Godfrey
Co-Manager

Date: 5/5/16

NICKOLAS GODFREY

By: Nickolas Godfrey
Nickolas Godfrey

Date: 5/5/16

JENNIFER GODFREY

By: Jennifer Godfrey
Jennifer Godfrey

Date: 5/5/16