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**BEFORE THE ARKANSAS SECURITIES COMMISSIONER  
CASE NO. S-12-0190**

ARKANSAS SECURITIES DEPT.

**IN THE MATTER OF:**

**Order No. S-12-0190-12-OR01**

**SPYDER LYNK, LLC**

**RESPONDENT**

**CONSENT ORDER**

This Consent Order is entered pursuant to the Arkansas Securities Act, codified at Ark. Code Ann. §§ 23-42-101 through 23-42-509 (“Act”), the Rules of the Arkansas Securities Commissioner (“Rules”) promulgated under the Act and the Arkansas Administrative Procedures Act, codified at Ark. Code Ann. §§ 25-15-201 through 25-15-219 in accordance with an agreement by and between the Staff of the Arkansas Securities Department (“Staff”) and Spyder Lynk, LLC (“Spyder Lynk”) in full and final settlement of all claims that could be brought against Spyder Lynk by the Staff on the basis of the facts set forth herein.

Spyder Lynk admits the jurisdiction of the Act and the Arkansas Securities Commissioner (“Commissioner”), waives its right to a formal hearing, consents to the entry of this order, and agrees to abide by its terms. Spyder Lynk also agrees that entry of this order has no impact on its potential civil liability to Arkansas investors under Ark. Code Ann. § 23-42-106 for the violations detailed below.

**FINDINGS OF FACT**

1. On or about November 29, 2011, agents or employees of Spyder Lynk made its first sale of securities in a Spyder Lynk offering to an Arkansas resident.
2. On or about May 7, 2012, Spyder Lynk filed a Notice of Sale of Securities on United States Securities and Exchange Commission (“SEC”) Form D with the Arkansas Securities Department (“Department”).

3. In violation of Ark. Code Ann. § 23-42-509(c)(1) and Rule 509.01(b)(2) of the Rules of the Arkansas Securities Commissioner, Spyder Lynk failed to file the Notice of Sale of Securities on SEC Form D with the Department concerning the sale of securities in Arkansas within the required fifteen days.

**CONCLUSIONS OF LAW**

4. Spyder Lynk's filing of the Notice of Sale of Securities on SEC Form D with the Department approximately five months after the sale of securities in the Spyder Lynk offering to an Arkansas resident as detailed in paragraphs 1-3 is a violation of Ark. Code Ann. § 23-42-509(c)(1) and Rule 509.01(b)(2) of the Rules.

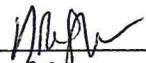
5. Entry of this Order does not affect the potential civil liability of Spyder Lynk under Ark. Code Ann. § 23-42-106 for Arkansas investors in the Spyder Lynk offerings.

**ORDER**

IT IS THEREFORE ORDERED that Spyder Lynk pay a fine in the amount of \$500.00.

  
A. Heath Abshure  
Arkansas Securities Commissioner  
Nov. 14, 2012  
Date

Spyder Lynk, LLC

By:   
Title: CEO  
Date: 8/3/12

  
Kaycee Wolf  
Staff Attorney