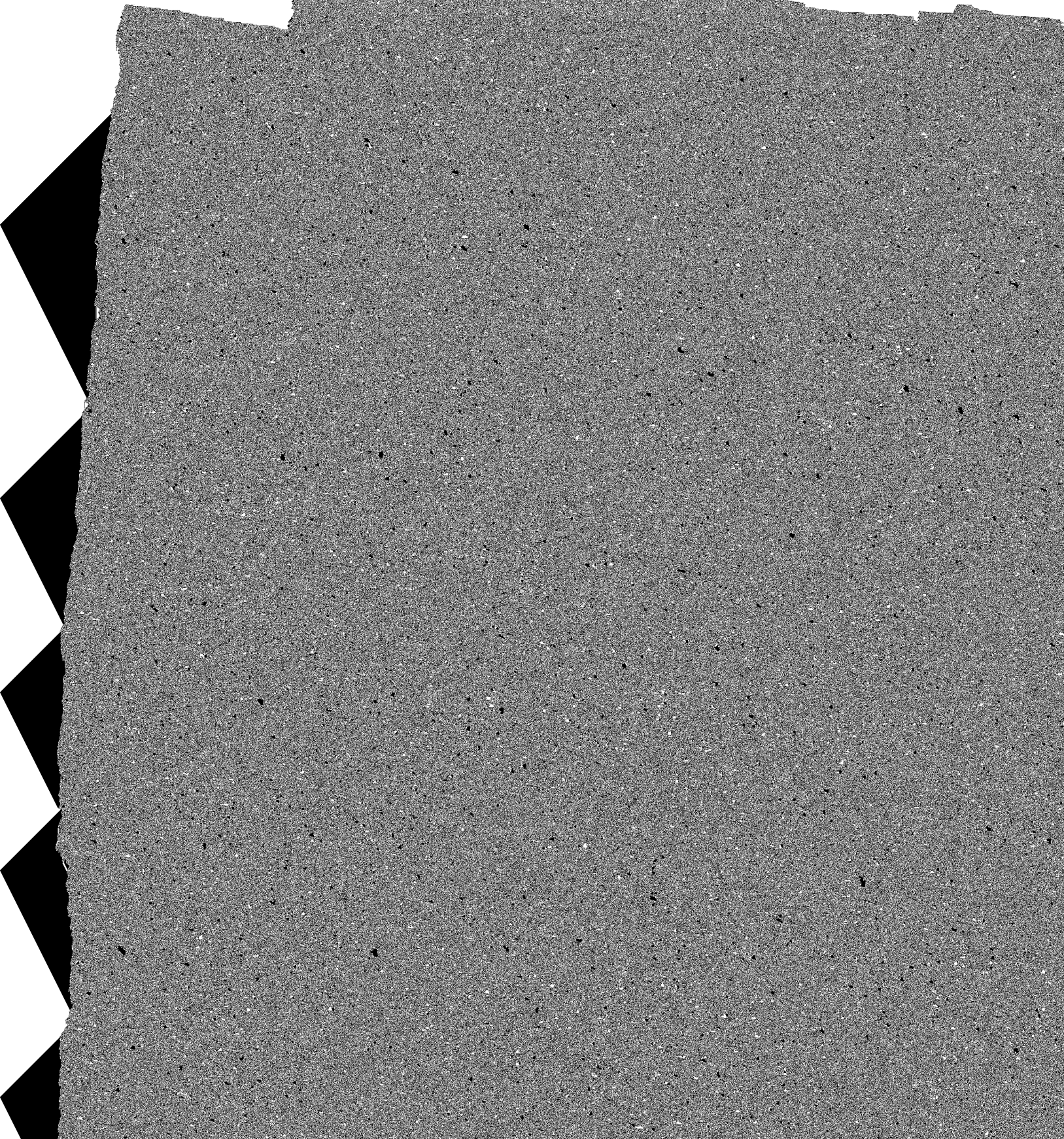


**ADMINISTRATIVE PROCEEDING
BEFORE THE
SECURITIES COMMISSION OF SOUTH CAROLINA**



WHEREAS, the Securities Commission has jurisdiction over the Respondents and the subject matter of these proceedings, find the remedies that the Respondents have requested and approved by this Consent Order, both appropriate and in the public interest;

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

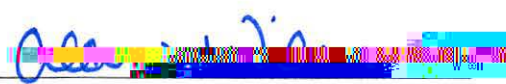
- A. Each Respondent shall comply with the Securities Act, prior to any future offering or sale of a security in South Carolina;
- B. Within ten (10) days of the date of entry of this Consent Order, the Respondents shall and severally pay a civil penalty of five hundred dollars (\$500.00) and costs of five hundred dollars (\$500.00) to the Division to help defray investigation and other costs associated with this matter.

Upon execution by the Securities Commission
Proceeding 20183352

All parties to this Consent Order understand and agree that this Consent Order is not intended to constitute an admission of liability or a finding of fault, and shall not be used as evidence in any subsequent action based on the underlying facts.

IT IS SO ORDERED this 17 day of November, 2018.

By:



Alan Williams
Securities Division
State of South Carolina

