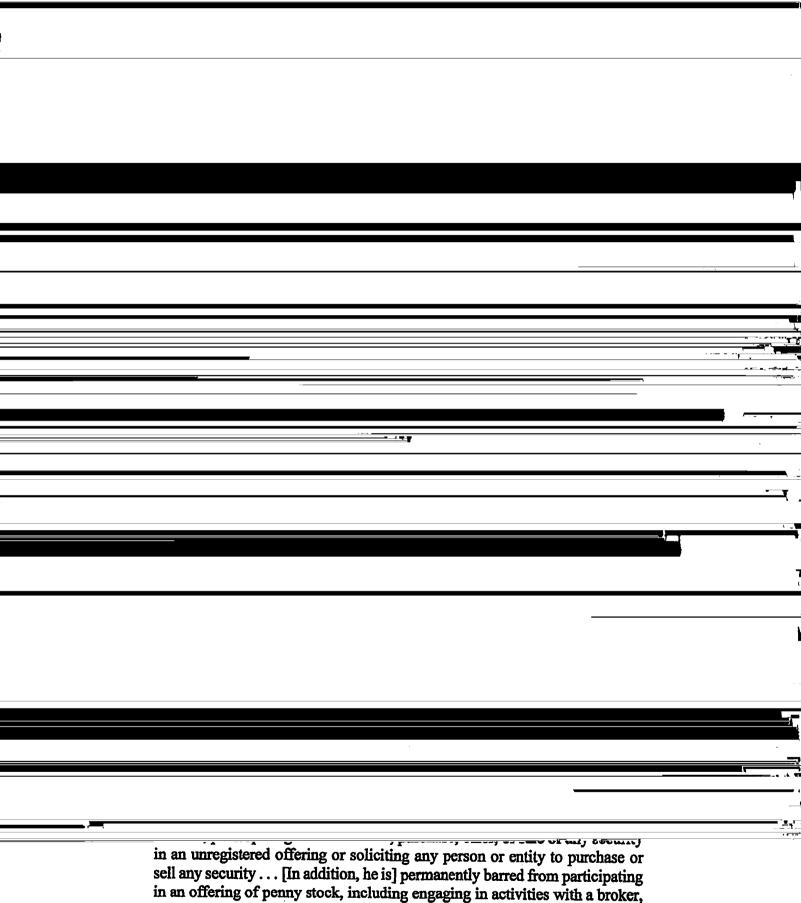
Order to Cease and Desist, except as to the jurisdiction of the Securities Commissioner of South	
which are admitted, the Respondents expressly consent to the entry of this Consent Order, which	
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12 Pence Consulting, LLC, Robert McIntosh, David M. Naylor, Kenneth Edward Shelton, Joel C. Duncan, Daniel	

without admitting or denying the findings of fact and conclusions of law set forth in the

12 Pence Consulting, LLC, Robert McIntosh, David M. Naylor, Kenneth Edward Shelton, Joel C. Duncan, Daniel Thomas Broyles, Sr., William Roth (a/k/a Bill Roth, a/k/a Billy Roth, a/k/a Al Green), and Craig Wiita — Order to Cease and Desist, Matter No. 20163015 (April 22, 2019) (http://2hsvz0174ah31vgcm16peuy12tz.wpengine.netdna-cdn.com/wp-content/uploads/2019/04/01951181.pdf).



and will be satisfied upon payment of \$10,000 toward the disgorgement ordered	-
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(\$10,000), for violations of the Act. Payment of this penalty is held in abeyance



## South Carolina Attorney General's Office Securities Division:

6/30/20 Date: \_