

WHEREAS, the Division does not find Respondents' argument compelling, but is willing to resolve the Cease and Desist Order by Consent rather than by a formal hearing before the Commissioner; and

WHEREAS, Respondents attest, by their signature on this document, which is specifically deemed to be a document covered by S.C. Code Ann. § 35-1-505, that they have not sold any investments or securities in South Carolina; and

WHEREAS, Respondents agree to the investor protections and remedies set forth below, without admitting or denying the allegations of the Cease and Desist Order filed by the Division in this matter;

NOW, THEREFORE, IT IS HEREBY ORDERED, and Respondents expressly consent and agree that:

- A. Effective immediately, Respondent Routh will cease and desist from engaging in any offering of unregistered, non-exempt securities in or from the State of South Carolina;
- B. This Order is not to be used as a disqualifier under Regulation D of the Securities Act of 1933; and
- C. Upon the Commissioner's execution of this Order, Respondent Routh shall pay five thousand dollars (\$5,000.00) to the Division. This payment shall be made in four equal monthly installments of \$1,250.00, and shall be due on the 20th day of the each month beginning in May 2013.

Upon execution by the Commissioner, this Consent Order resolves Administrative Proceeding 13021. This Order should not be interpreted to waive any (i) criminal cause of action, (ii) private cause of action that may have accrued to investors as a result of any of the named Respondents' participation in the activities described herein, or (iii) other causes of action


which may result from activities of any of the named Respondents not detailed above or which may hereafter arise.

IT IS SO ORDERED this 17 day of May, 2013.

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

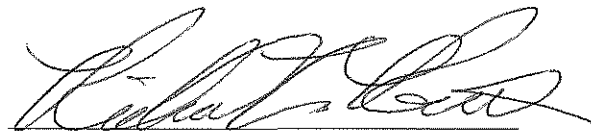
WE CONSENT:

Securities Division of the Office of the Attorney General

By: 
Andrew J. MacLeod
Assistant Attorney General
Securities Division

Date: 5/16/2013

Richard L. Routh, for Respondents

By: 

Date: 5/14/2013