

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

NOW, THEREFORE, IT IS HEREBY ORDERED, and Respondent expressly consents and agrees that:

- A. It shall Cease and Desist from engaging in any activities that constitute violations of S. C. Code Ann. § 35-1-301;
- B. It shall observe high standards of commercial honor and just and equitable principles of trade in the conduct of its business governed by the Act and the rules and regulations adopted thereunder; and
- C. Upon the Commissioner's execution of this Order, Respondent shall pay an administrative fine in the amount of five thousand five hundred dollars (\$5,500.00).

Upon execution by the Commissioner, this Consent Order resolves Administrative Proceeding 10052.

IT IS SO ORDERED this 25 day of September, 2013.

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

WE CONSENT:

Securities Division of the Office of the Attorney General

By: Tracy Meyers
Tracy Meyers
Deputy Assistant Attorney General
Securities Division

Date: 9/19/13

Venulum LTD., Respondent

By: [Signature]
(title) CHAIRMAN

Date: 18/09/13