

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

IN THE MATTER OF:

**Cunningham Energy LLC,
James Lockhart, Kevin Thibeau,
Jan Peter Bolton, Scott Johnson, and
Douglas Hardwick,
Respondents.**

**CONSENT ORDER AS TO
RESPONDENT KEVIN THIBEAU**

Matter No. 20165031

I. PRELIMINARY STATEMENT

This Consent Order is entered into between the Securities Division of the Office of the Attorney General of South Carolina (the "Division") and Kevin Thibeau (the "Respondent"), in order to resolve the Order to Cease and Desist issued under Matter No. 20165031, which alleged that certain conduct of the Respondent violated the provisions of S.C. Code Ann. § 35-1-101, *et seq.*, the South Carolina Uniform Securities Act of 2005 (the "Act").

Without admitting to or denying the findings of fact and conclusions of law set forth in the Order to Cease and Desist, except as to the jurisdiction of the Securities Commissioner of South Carolina (the "Securities Commissioner") over him and the subject matter of this proceeding, which are admitted, the Respondent expressly consents to the entry of this Consent Order which resolves the allegations set forth in the Order to Cease and Desist.

II. ORDER

The Securities Commissioner finds this Consent Order to be in the public interest. Accordingly, it is hereby ORDERED that:

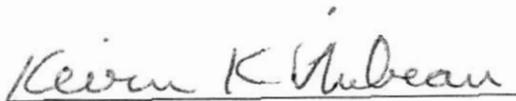
- A. The Respondent will seek appropriate registration with the Division, pursuant to the Act, prior to any offer or sale of securities in South Carolina;
- B. The Respondent will fully cooperate with the Division's ongoing inquiries in the activities of Cunningham Energy, LLC and related entities and individuals; and
- C. The Respondent will pay a fine in the amount of Two Thousand Dollars (\$2,000) contemporaneously with the execution of this Consent Order.

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 the activities detailed in the Order to Cease and Desist, or (iii) other causes of action that may result from activities of the Respondent detailed therein.

IT IS SO ORDERED this 10 day of August, 2018.

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

Respondent:


Kevin Thibeau

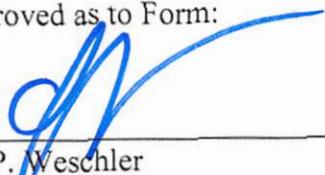
Date: 7/25/18

Reviewed By:


Jeff Diamant, Esq.
Jeff Diamant, P.C.
Counsel for Respondents

Date: 8/7/18

Approved as to Form:


Ian P. Weschler
Assistant Attorney General
Securities Division

Date: 8/7/2018