

IN THE MATTER OF:)	
)	CONSENT ORDER
Lucy Duncan-Scheman)	
a/k/a Lucy Duncan)	
and)	File No. 06007
Carolina Linkages, Inc.)	
d/b/a Carolinks,)	
)	
Respondents.)	

WHEREAS, in connection with its investigation, the Division, on October 12, 2007, issued a Cease and Desist Order (the “Cease and Desist Order”) against Respondents;

Journal of the American Medical Association

Published Weekly, except on Sundays and Holidays

Vol. 10, No. 1, January 1917

Published by the American Medical Association, 535 North Dearborn Street, Chicago, Ill.

Subscription Price, \$5.00 per Annum in Advance

Single Copies, 15 Cents
Entered as Second-Class Matter, October 3, 1911, Post Office at Chicago, Ill., under No. 100,000. Accepted for mailing at special rate of postage provided for in Act of October 3, 1917, authorized on July 16, 1918. Postage paid at Chicago, Ill., and at additional mailing offices. Postmaster: Send address changes in this journal to JOURNAL OF THE AMERICAN MEDICAL ASSOCIATION, 535 North Dearborn Street, Chicago, Ill.

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WHEREAS, the Respondents have disputed and continue to dispute the allegations contained in the Cease and Desist Order and have not admitted any violations of the Act or the Prior Act; and

WHEREAS, Respondents admit the Securities Commissioner of the State of South Carolina (the "Securities Commissioner") has jurisdiction in this matter and desire to bring this matter to conclusion and have agreed, without any admission that there has been any violation of the Act or of the Prior Act, to the investor protections and remedies set forth below;

NOW, THEREFORE, it is ordered, and Respondents agree:

a. Effectively immediately, Respondents and all persons under their direction or control involved in the offer or sale of the Carolinks shares will cease and desist from offering and selling unregistered securities in or from South Carolina and cease and desist from acting as unregistered agents in or from South Carolina;

b. Effective immediately, any exemption available to the Respondents under the Act is revoked;

c. Respondent Duncan-Scheman will not offer or sell any security in or from the State of South Carolina for a five-year period, which commenced May 1, 2007; and

d. Respondents will pay an administrative fine in the amount of ninety thousand (\$90,000) dollars and investigative costs in the amount of ten thousand (\$10,000) dollars, with such fine and costs to be joint and several as to all executing parties.

Upon execution by the Securities Commissioner, this Order resolves Administrative Proceeding 06007 as it relates to the Respondents. 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

challenge. The only way to ensure that the system is not abused is to have a strong, independent body to oversee the process. This body should be made up of representatives from the public, the private sector, and the government. It should have the power to investigate complaints, to recommend changes to the system, and to enforce the rules. The body should also have the power to suspend or revoke the license of any participant who is found to be in violation of the rules. This will ensure that the system is fair and that the public's interests are protected.

The second challenge is to ensure that the system is transparent. The public should be able to see how the system works, how decisions are made, and how the rules are enforced. This will help to build trust in the system and to ensure that the public is aware of its rights and responsibilities. Transparency can be achieved by making the rules and procedures of the system publicly available, by holding regular public consultations, and by providing regular updates on the system's performance.

The third challenge is to ensure that the system is effective. The system should be able to identify and address problems quickly and efficiently. This will require a strong, independent body to oversee the process, as well as a system of regular monitoring and evaluation. The system should also be able to adapt to changing circumstances and to new challenges. This will require a flexible and responsive system of governance.

The fourth challenge is to ensure that the system is sustainable. The system should be able to generate enough revenue to cover its costs and to maintain the infrastructure. This will require a system of fees and charges that is fair and reasonable. The system should also be able to attract private investment and to generate employment opportunities. This will require a system of incentives and disincentives that is designed to encourage investment and innovation.

The fifth challenge is to ensure that the system is inclusive. The system should be able to serve the needs of all members of the public, including the poor and the marginalized. This will require a system of subsidies and social safety nets that is designed to protect the most vulnerable. The system should also be able to provide training and technical assistance to help people improve their skills and their livelihoods.

The sixth challenge is to ensure that the system is secure. The system should be able to protect the public's data and to prevent fraud and corruption. This will require a system of strong security measures and a system of regular audits. The system should also be able to respond quickly to any security threats or incidents.

The seventh challenge is to ensure that the system is resilient. The system should be able to withstand shocks and stresses and to recover quickly from any disruptions. This will require a system of strong risk management and a system of regular disaster preparedness planning. The system should also be able to adapt to changing circumstances and to new challenges.

The eighth challenge is to ensure that the system is innovative. The system should be able to use new technologies and to develop new products and services. This will require a system of strong intellectual property protection and a system of regular innovation funding. The system should also be able to attract and retain top talent and to foster a culture of innovation.

The ninth challenge is to ensure that the system is accountable. The system should be able to hold its participants accountable for their actions and to provide a system of redress for any grievances. This will require a system of strong legal and regulatory frameworks and a system of regular monitoring and evaluation. The system should also be able to provide a system of public participation and consultation.

The tenth challenge is to ensure that the system is fair. The system should be able to provide a level playing field for all participants and to ensure that the rules are applied equally to everyone. This will require a system of strong legal and regulatory frameworks and a system of regular monitoring and evaluation. The system should also be able to provide a system of public participation and consultation.

a result of either of Respondents' participation in the security offerings described in the Cease and Desist Order, or (iii) other causes of action which may result from activities of the Respondents not detailed in the Cease and Desist Order.

So ORDERED this 18th day of February, 2008.

By: Henry McMaster
Henry McMaster
Securities Commissioner

Securities Division of the Office of the Attorney General

By: Tracy A. Meyers
Tracy A. Meyers
Assistant Attorney General
Securities Division

Date: January 30, 2008

WE CONSENT:

Respondent Lucy Duncan-Scheman

By: Lucy Duncan-Scheman
Lucy Duncan-Scheman

Date: January 30, 2008

Respondent Carolina Linkages, Inc. d/b/a Carolinks

By: Lucy Duncan-Scheman
(name/position)
President, CEO

Date: January 30, 2008

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