

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

<b>IN THE MATTER OF:</b>	)	
	)	
<b>Dublin Finance Associates, LLC;</b>	)	<b>CONSENT ORDER</b>
<b>Thomas W. Janes;</b>	)	<b>AS TO RESPONDENTS</b>
<b>Commonwealth Botanicals, LLC; and</b>	)	<b>COMMONWEALTH</b>
<b>Dean Douglas Porter,</b>	)	<b>BOTANICALS, LLC AND</b>
	)	<b>DEAN DOUGLAS PORTER</b>
	)	<b>Matter No. 20194002</b>
<b>Respondents.</b>	)	
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**WHEREAS**, pursuant to the authority granted to the Securities Commissioner of South Carolina (the “Securities Commissioner”) under the South Carolina Uniform Securities Act of 2005, S.C. Code Ann. § 35-1-101, *et seq.*, and the regulations and rules promulgated thereunder (collectively, the “Act”), and delegated to the Securities Division of the Office of the Attorney General of the State of South Carolina (the “Division”) by the Securities Commissioner, the Division conducted an investigation into the securities-related activities of Dublin Finance Associates, LLC (“Dublin”), Thomas W. Janes (“Janes”), Commonwealth Botanicals, LLC (“Commonwealth”), and Dean Douglas Porter (“Porter”) (collectively, the “Respondents”); and

**WHEREAS**, as a result of the investigation, the Division commenced this matter on July 22, 2022, with the entry of an Order to Cease and Desist and Notice of Opportunity for Hearing (the “Cease and Desist Order”)<sup>1</sup> against the Respondents; and

**WHEREAS**, the Cease and Desist Order set forth violations of the Act by the Respondents, specifically violations of the Act’s provisions related to the offering and selling of an unregistered

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<sup>1</sup> In the Matter of Dublin Finance Associates, LLC, *et al.* – Order to Cease and Desist (7/22/2022) (<https://www.scag.gov/media/kx4pscoe/cease-and-desist-order-dublin-finance-associates-llc-et-al-matter-no-20194002-final-03053821xd2c78.pdf>)

security and the making of material misrepresentations or omitting to make material representations in the offering and selling of a security; and

**WHEREAS**, without admitting or denying the Findings of Fact and Conclusions of Law set forth in the Cease and Desist Order, which are incorporated by reference herein, except as to the Securities Commissioner's jurisdiction over Commonwealth, Porter, and the subject matter of these proceedings, which are admitted, Commonwealth and Porter, having been advised of their rights to counsel, expressly consent to the entry of this Consent Order, which resolves the allegations against them set forth in the Cease and Desist Order; and

**WHEREAS**, Commonwealth and Porter elect to waive permanently any right to a hearing and appeal under S.C. Code Ann. § 35-1-609, with respect to this Consent Order; and

**WHEREAS**, Commonwealth and Porter agree to the investor protections and remedies set forth below; and

**WHEREAS**, the Securities Commissioner finds the investor protections and remedies in this Consent Order both appropriate and in the public interest, for the protection of investors and the capital markets of the State of South Carolina; and

**NOW, THEREFORE**, pursuant to S.C. Code Ann. § 35-1-604(a)(1), it is hereby **ORDERED**, and Commonwealth and Porter expressly consent and agree that:

- A. Commonwealth, Porter, and every successor, affiliate, control person, agent, servant, and employee of Commonwealth and Porter, and every entity owned, operated, or indirectly or directly controlled by or on behalf of Commonwealth or Porter, shall **CEASE AND DESIST** from transacting business in this State in violation of the Act;
- B. Porter shall enter into agreements to disgorge all interest in or rights of control over any shares of common stock of LabCanna Biosciences, Inc. ("LabCanna") received pursuant

to the settlement agreement entered between Commonwealth, Porter, and LabCanna, on or about January 29, 2020, for the purpose of settling LabCanna's breach of a Manufacturing Agreement with Commonwealth, or proceeds derived from the disposition of said shares, and shall cooperate with the Securities Division in promptly executing documents effectuating the same;

- C. Commonwealth expressly consents and agrees to be **PERMANENTLY BARRED** in the State of South Carolina from acting as an issuer, as defined in S.C. Code Ann. § 35-1-102(17).
- D. Porter expressly consents and agrees to be **PERMANENTLY BARRED** in the State of South Carolina from acting as an agent, as defined in S.C. Code Ann. § 35-1-102(2);
- E. This Consent Order shall not prohibit Commonwealth and Porter from engaging in conduct required pursuant to the terms of subsection B, herein.
- F. Commonwealth and Porter expressly consent and agree to be **PERMANENTLY BARRED** from offering or selling securities to, from, or within the State of South Carolina until such securities are properly registered with the Division; and
- G. Commonwealth and Porter shall jointly and severally pay a civil penalty in the amount of five thousand dollars (\$5,000.00) to the Division.
- H. In consideration of Porter's obligation pursuant to section B, *supra*, the civil monetary penalty ordered in section (G), *supra*, is hereby **SUSPENDED**.

Upon execution by the Securities Commissioner, this Consent Order resolves Matter Number 20194002 as to Commonwealth and Porter.

As part of this Consent Order, Commonwealth and Porter agree that they: (i) will not take any action or make or permit to be made any public statement denying, directly or indirectly, any


allegation in this Consent Order or creating the impression that this Consent Order is without factual basis; and (ii) will not make or permit to be made any public statement to the effect that Commonwealth and Porter do not admit the allegations, without also stating that Commonwealth and Porter do not deny the allegations.

If Commonwealth or Porter breach any of the terms of this Consent Order, the Securities Commissioner may vacate this Consent Order. Nothing in this paragraph affects Commonwealth's or Porter's: (i) testimonial obligations or (ii) right to take differing legal or factual positions in litigation or other legal proceedings.

This Consent 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 herein, or (iii) other causes of action that may result from activities of a Respondent not detailed in this Consent Order.

**IT IS SO ORDERED.**

ENTERED, this the 22 day of July, 2025.

  
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ALAN WILSON  
Securities Commissioner  
State of South Carolina

*Respondent Commonwealth Botanicals, LLC consents to the terms of the above Consent Order:*

Commonwealth Botanicals, LLC

By: 

Authorized Representative

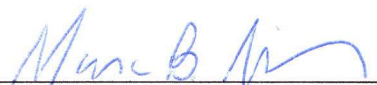
Date: 7-8-25

*Respondent Dean Douglas Porter consents to the terms of the above Consent Order:*

  
Dean Douglas Porter

Date: 7-8-25

*Reviewed by Counsel for Dean Douglas Porter, Individually, and on behalf of Commonwealth Botanicals:*

  
Marc B. Minor  
Thompson Hine LLP  
41 South High Street, Suite 1700  
Columbus, Ohio 43215

Date: 7/15/25

*The Securities Division of the Office of the South Carolina Attorney General consents to the above Consent Order:*

By: 

Jonathan B. Williams  
Assistant Deputy Attorney General

Date: 7/21/25