ADMINISTRATIVE PROCEEDING

BEFORE THE

SECURITIES COMMISSIONER OF SOUTH CAROLINA

IN THE MATTER OF:)	
)	CONSENT ORDER
Robert Charles Couch; Oil 2 Holdings,)	
Inc.; and Couch Financial Services)	File No. 13107
Incorporated,)	
Respondents.)	
)	

WHEREAS, the Securities Division of the Office of the Attorney General of the State of South Carolina (the "Division"), pursuant to authority granted in the South Carolina Uniform Securities Act, S.C. Code Ann. §§ 35-1-101 to 35-1-703 (Supp. 2012) (the "Act"), initiated an investigation into certain activities of Robert Charles Couch ("Couch"); Oil2 Holdings, Inc.; and Couch Financial Services Incorporated (collectively, "Respondent Entities") involving the sale of securities in South Carolina;

WHEREAS, on or about March 10, 2014, the Division issued an Order to Cease and Desist against Couch and the Respondent Entities, which made a preliminary finding that Couch and Respondent Entities engaged in acts and transactions constituting violations of §§ 35-1-301, 35-1-402, and 35-1-501 of the Act;

WHEREAS, the Respondents, without admitting or denying the factual allegations, findings, or other statements of the Order to Cease and Desist, acknowledge their desire to resolve the allegations and findings in the Order to Cease and Desist and resolve the Order to Cease and Desist by Consent Order rather than by a formal hearing before the Securities Commissioner;

WHEREAS, Couch and Respondent Entities admit the Securities Commissioner has jurisdiction in this matter; 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 the investors and the capital markets of the State of South Carolina.

NOW THEREFORE, IT IS HEREBY ORDERED, and Couch and Respondent Entities consent and agree that:

- A. Couch and Respondent Entities shall immediately cease and desist from transacting business in this State that is in violation of the Act, and in particular, S.C. Code Ann. §§ 35-1-301, 35-1-402, and 35-1-501;
- B. Upon the Commissioner's execution of this Order, Respondent Entities shall pay fifteen thousand dollars (\$15,000) for the cost of the Commissioner's investigation; and
- C. Nothing in this Consent Order is intended (nor should be interpreted) to disqualify Couch or Respondent Entities in any way from reliance on Rule 506 of Regulation D of the Securities Act of 1933, 17 C.F.R. § 230.506(d).

Upon execution by the Securities Commissioner, this Order resolves Administrative Proceeding 12028. 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 Respondents' participation in the activities described in the Order to Cease and Desist, or (iii) other causes of action that may result from activities of Couch and Respondent Entities not detailed therein or which may hereafter arise.

IT IS SO ORDERED this **22** day of September, 2014.

Alan Wilson

Securities Commissioner State of South Carolina

WE CONSENT:

(Title) President

Securities Division of the Office of the Attorney General			
By: Tracy A. Meyers	Date:	9119114	
Assistant Deputy Attorney General/			
Deputy Securities Commissioner			
Robert Charles Couch			
Mil	D. ()	9/12/2014	
	Date:	3/12/2011	
Oil2 Holdings, Inc.			
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Ву:	Date:	9/12/2014	
(Name) Robert Couch			
677.			
(Title) CEO			
Couch Financial Services Incorporated			
By:	Data	9/12/2014	
Dobort Couch	Date:		