ADMINISTRATIVE PROCEEDING

BEFORE THE

SECURITIES COMMISSIONER OF SOUTH CAROLINA

IN THE MATTER OF:) Infinity Business Group, Inc.,) Wade B. Cordell,) Otis Bradshaw Cordell, John F. Blevins,) Bryon K. Sturgill, and Haines Hargett,)

Respondents.

CONSENT ORDER AS TO RESPONDENT BRYON K. STURGILL

File No. 09089

WHEREAS, the Securities Division of the South Carolina Office of the Attorney General (the "Division"), pursuant to authority granted in the South Carolina Uniform Securities Act of 2005, S.C. Code Ann. § 35-1-10 *et. seq.* (the "Act"), initiated an investigation into the securities-related activities of Infinity Business Group, Inc., Wade B. Cordell, Otis Bradshaw Cordell, John F. Blevins, Haines Hargrett, and Bryon K. Sturgill (collectively, "Respondents") conducted in and from South Carolina; and

WHEREAS, on or about May 26, 2011, the Division issued a Complaint alleging the Respondents, including Bryon Sturgill ("Respondent Sturgill"), engaged in acts, practices, and transactions constituting violations of the Act; and

WHEREAS, the Complaint seeks to have the Respondents permanently barred from engaging in participating in the securities industry in or from the State of South Carolina; and

WHEREAS, the Complaint seeks an administrative fine against Respondent Sturgill in an amount not exceeding ten thousand dollars (\$10,000.00) for each violation of the Act and each violation of any rule or order promulgated by the Securities Commissioner, but no less than one million dollars (\$1,000,000.00); and

WHEREAS, the Complaint seeks reimbursement of the costs of the investigation and any proceeding in this matter, but no less than one hundred thousand dollars (\$100,000.00); and

WHEREAS, Respondent Sturgill, without admitting or denying the factual allegations of the Complaint and without waiving any defenses in any other matter, acknowledges his desire to resolve the Complaint by Consent Order rather than by a formal hearing before the Securities Commissioner (the "Commissioner"); and

WHEREAS, Respondent Sturgill understands he has a right to a hearing on the Complaint and has waived that right; and

WHEREAS, Respondent Sturgill admits the Securities Commissioner has jurisdiction in this matter; and

WHEREAS, the 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 Respondent Sturgill expressly consents and agrees that:

- A. Effective immediately, Respondent Sturgill is permanently barred from participating in any aspect of the securities industry in or from the State of South Carolina; and
- B. Effective immediately, Respondent Sturgill is permanently barred from allowing any person under his direction or control to participate in any aspect of the securities industry in or from the State of South Carolina.

In addition, the Securities Commissioner hereby finds that it is in the public interest not to levy an administrative fine or seek reimbursement of investigative or other costs incurred in this matter so that any and all monies recovered from the Respondents in other actions based on the same or similar facts as those alleged in the present case, including but not limited to actions of the type described below, can directly benefit harmed investors.

Upon execution by the Commissioner, this Order resolves Administrative Proceeding 09089 as it relates to Respondent Sturgill.

The parties to this Order agree the Order does not and should not be interpreted to waive any (i) criminal cause of action, (ii) private cause of action that may have accrued to any investor or investors as a result of Respondent Sturgill's participation in the activities described in the Complaint in Administrative Proceeding 09089, (iii) action of any kind in any type of bankruptcy proceeding(s), or (iv) other causes of action which may result from any activity of Respondent Sturgill not detailed above or which may hereafter arise.

IT IS SO ORDERED this 1st day of October , 2012.

By: alow Wilson

Alan Wilson Securities Commissioner State of South Carolina

I FREELY AND VOLUNTARILY CONSENT TO THE TERMS SET FORTH ABOVE:

By: Bryon K. Sturgill Date: <u>9-20-12</u>

WE CONSENT:

Securities Division of the Office of the Attorney General

By: A Adam L. Whitsett

Assistant Attorney General

Date: 9/27/12