ADMINISTRATIVE PROCEEDING

BEFORE THE

SECURITIES COMMISSIONER OF SOUTH CAROLINA

IN THE MATTER OF:)	
)	CONSENT ORDER
Richard L. Routh and Invictus University,)	
)	File No. 13021
Respondents.)	

WHEREAS, the Securities Division of the Office of the Attorney General of the State of South Carolina (the "Division"), after receiving information and pursuant to authority granted in the South Carolina Uniform Securities Act of 2005 (the "Act"), S.C. Code Ann. § 35-1-10 et. seq. (Supp. 2012), initiated an investigation into certain activities of the persons named as Respondents in the case caption above (the "Respondents"); and

WHEREAS, in connection with its investigation, the Division determined that Respondents engaged, were engaging, or were about to engage in certain acts constituting violations of the Act, and the Division issued an Order to Cease and Desist against the Respondents for these alleged violations; and

WHEREAS, Respondent Routh asserts that Respondent Invictus University was not formed as a company and did not have any actual shares of stock available for purchase, but was rather a concept intended to be used in South Carolina primarily as a teaching aid; and

WHEREAS, Respondents wish to resolve the Cease and Desist Order against them by Consent Order rather than by a formal hearing before the Securities Commissioner (the "Commissioner"); and

WHEREAS, the Division does not find Respondents' argument compelling, but is willing to resolve the Cease and Desist Order by Consent rather than by a formal hearing before the Commissioner; and

WHEREAS, Respondents attest, by their signature on this document, which is specifically deemed to be a document covered by S.C. Code Ann. § 35-1-505, that they have not sold any investments or securities in South Carolina; and

WHEREAS, Respondents agree to the investor protections and remedies set forth below, without admitting or denying the allegations of the Cease and Desist Order filed by the Division in this matter;

NOW, THEREFORE, IT IS HEREBY ORDERED, and Respondents expressly consent and agree that:

- A. Effective immediately, Respondent Routh will cease and desist from engaging in any offering of unregistered, non-exempt securities in or from the State of South Carolina;
- B. This Order is not to be used as a disqualifier under Regulation D of the Securities Act of 1933; and
- C. Upon the Commissioner's execution of this Order, Respondent Routh shall pay five thousand dollars (\$5,000.00) to the Division. This payment shall be made in four equal monthly installments of \$1,250.00, and shall be due on the 20th day of the each month beginning in May 2013.

Upon execution by the Commissioner, this Consent Order resolves Administrative Proceeding 13021. 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 any of the named Respondents' participation in the activities described herein, or (iii) other causes of action

which may result from activities of any of the named Respondents not detailed above or which may hereafter arise.

IT IS SO ORDERED this ______, day of _________, 2013.

Alam Wilcon

Securities Commissioner State of South Carolina

WE CONSENT:

eral Date: 5/16/2013
Date: 5/14/2013