

STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION

IN THE MATTER OF:)
)
ALDEN LEE COMPANY, INC.) ADMINISTRATIVE ORDER
RICHARD JOSEPH LEE) NO. CD-2005-0016
)
RESPONDENTS)

CEASE AND DESIST ORDER

The Alabama Securities Commission ("Commission"), having the power to administer and provide for the enforcement of all provisions of Title 8, Chapter 6, Code of Alabama 1975, the Alabama Securities Act ("Act"), upon due consideration of the subject matter hereof, and having confirmed information of the offers for sale and/or sale of securities, into, within or from the state of Alabama, has determined as follows:

RESPONDENTS

1. ALDEN LEE COMPANY, INC. ("LEE, INC.") is a California company, with a business address of P.O. Box 3099, Menlo Park, California, 94026.

2. RICHARD JOSEPH LEE ("LEE") is the founder and President of ALDEN LEE COMPANY, Inc. with a personal address of 224 El Camino Road, Scotts Valley, California, 95066, and a business address of P.O. Box 3099, Menlo Park, California, 94026.

STATEMENT OF FACTS

3. Information made available to the Commission indicates that in September 2004, LEE offered an investment contract described as an agreement to purchase royalty rights of LEE, INC. to an investor residing in Alabama.

4. A review of the files of the Alabama Securities Commission Registration Division disclosed no record of registration nor exemption from registration as a Securities Agent or Dealer in the state of Alabama.

5. A review of the files of the Alabama Securities Commission Registration Division disclosed no record of registration nor exemption from registration for the offer and/or sale of securities of LEE, Inc.

CONCLUSIONS OF LAW

6. Neither LEE nor LEE, INC. are registered, or exempt from registration as a Dealer or Agent in the state of Alabama. The sale of securities by an unregistered Dealer or Agent in the state of Alabama is a violation of Section 8-6-3(a), Code of Alabama 1975.

7. The investment agreement of LEE, INC. is neither registered nor exempt from registration in the state of Alabama. The sale of unregistered securities, in the state of Alabama is a violation of Section 8-6-4, Code of Alabama 1975.

This Order does not prevent the Alabama Securities Commission from seeking such other civil or criminal remedies that are available to it under the Act.

This Order is appropriate in the public interest for the protection of investors and is consistent with the purposes of the Act.

ACCORDINGLY, IT IS HEREBY ORDERED that RESPONDENTS immediately **CEASE AND DESIST** from further offers or sales of any security into, within or from the state of Alabama.

Entered at Montgomery, Alabama, this 8th day of April, 2005.



ALABAMA SECURITIES COMMISSION
770 Washington Avenue, Suite 570
Montgomery, AL 36130-4700
(334) 242-2984

BY:

A handwritten signature in black ink, appearing to read "Joseph P. Borg", is written over a horizontal line.

JOSEPH P. BORG
Director