STATE OF CALIFORNIA

BUSINESS, TRANSPORTATION AND HOUSING AGENCY

DEPARTMENT OF CORPORATIONS

TO: William M. Landers
1015 Phelps Avenue
San Jose, CA 95117

DESIST AND REFRAIN ORDER

(For violations of sections 25210 of the Corporations Code)

The California Corporations Commissioner finds that:

1.   William M. Landers possessing no certificate as a broker-dealer or agent offered and sold to residents of California securities in the form of viaticals issued by The Alpha Capital Group, LLC.

2.   William M. Landers offered and sold securities in the form of viaticals issued by The Alpha Capital Group, LLC to California residents on January 5, 1998, September 25, 1998, October 6, 1998, October 13, 1998, and November 11, 1998.

Based upon the foregoing findings, the California Corporations Commissioner is of the opinion that William M. Landers has effected transactions in securities as a broker-dealer without first having applied for and secured from the Commissioner a certificate, then in effect, authorizing him to act in that capacity, in violation of section 25210 of the Corporate Securities Law of 1968. Pursuant to Section 25532 of the Corporate Securities Law of 1968, William M. Landers is hereby ordered to **DESIST and REFRAIN** from effecting any transaction in, or inducing or attempting to induce the purchase or sale of, any security in this state, unless and until he has applied for and secured from the Commissioner a certificate, then in effect, authorizing him to act in that capacity.

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1   This Order is necessary, in the public interest, for the protection of investors and

2   consistent with the purposes, policies, and provisions of the Corporate Securities Law of

3   1968.

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5   Dated: December 24, 2002

6   Sacramento, California

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8   DEMETRIOS A. BOUTRIS
                          California Corporations Commissioner

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11   By_____

12   VIRGINIA JO DUNLAP
                     Supervising Counsel
                     Enforcement and Legal Services

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DESIST AND REFRAIN ORDER AGAINST WILLIAM M. LANDERS