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**STATE OF CALIFORNIA**  
**BUSINESS, TRANSPORTATION AND HOUSING AGENCY**  
**DEPARTMENT OF CORPORATIONS**

**TO: Judith P. Puette**  
**88 17<sup>th</sup> Street, Apt. 108**  
**San Mateo, CA 94402**

**DESIST AND REFRAIN ORDER**

**(For violations of sections 25210 of the Corporations Code)**

The California Corporations Commissioner finds that:

1. Judith P. Puette 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. Judith P. Puette offered and sold a security in the form of a viatical issued by The Alpha Capital Group, LLC to a California resident on December 11, 1998.

Based upon the foregoing findings, the California Corporations Commissioner is of the opinion that Judith P. Puette has effected a transaction in a security as a broker-dealer without first having applied for and secured from the Commissioner a certificate, then in effect, authorizing her 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, Judith P. Puette 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 she has applied for and secured from the Commissioner a certificate, then in effect, authorizing her to act in that capacity.

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This Order is necessary, in the public interest, for the protection of investors and consistent with the purposes, policies, and provisions of the Corporate Securities Law of 1968.

Dated: December 24, 2002  
Sacramento, California

DEMETRIOS A. BOUTRIS  
California Corporations Commissioner

By \_\_\_\_\_  
VIRGINIA JO DUNLAP  
Supervising Counsel  
Enforcement and Legal Services