

STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION

IN THE MATTER OF:)
STARR INTERNATIONAL TRADE VENTURE)
AKA S.I.T.A.)
AKA S.I.T.V.)
PAUL HUEY RICHARDSON)
RESPONDENTS)

ADMINISTRATIVE ORDER
NO. CD-2008- 0008

CEASE AND DESIST ORDER

The Alabama Securities Commission ("Commission"), having the authority 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. **STARR INTERNATIONAL TRADE VENTURE**, aka S.I.T.A., aka S.I.T.V. (**STARR**) is purported to be a Nevada entity with a business address of 2620 South Maryland Parkway, Las Vegas, Nevada 89109 and 1176 County Road 110, LaFayette, Alabama 36862.

2 **PAUL HUEY RICHARDSON (RICHARDSON)**, at all times relevant, was an agent of **STARR INTERNATIONAL TRADE VENTURE**, aka S.I.T.A., aka S.I.T.V. with a home and business address of 1176 County Road 110, LaFayette, Alabama 36862.

STATEMENT OF FACTS

4. Between April 17, 2005 and March 1, 2006, **RICHARDSON** acting as an agent for **STARR** offered and sold shares of **S.I.T.A.** , over the internet to a Hawaii resident.

5. At the direction of **RICHARDSON** the Hawaii resident sent a series of United States Postal Money Orders totaling \$4,300.00 to **STARR'S** Nevada address.

6. The Commission has in its possession copies of eight United States Postal Money Orders totaling \$4,300.00 sent from the Hawaii resident payable to **S.I.T.V.**

7. **STARR'S** business address of 2620 South Maryland Parkway, #866, Las Vegas, Nevada 89109 is a Mailbox, Etc. account opened by **RICHARDSON**.

8. The Commission has in its possession a copy of an "Application for Delivery of Mail Through Agent" for Mail Boxes, Etc. showing that it contracted with **STARR INTERNATIONAL TRADE VENTURE**, aka S.I.T.A though it's agent **PAUL HUEY RICHARDSON** using an Alabama drivers license # 3577664 and an address of 1176 County Road 110, LaFayette, AL. 36862.

9. On March 13, 2008, a review of the Commission's registration files disclosed no record of registration or exemption from registration in the state of Alabama for the securities, to wit: the shares offered and sold by **RESPONDENTS**.

10. On March 13, 2008, a review of the Commission's registration files disclosed no record of registration in the State of Alabama for the agent of **STARR INTERNATIONAL TRADE VENTURE, PAUL HUEY RICHARDSON**.

CONCLUSIONS OF LAW

11. Section 8-6-2 (10), Code of Alabama 1975, defines shares as a security. The shares sold to the Hawaii investor are a security under Alabama law.

12. Under Section 8-6-2(2), Code of Alabama 1975, the definition of "agent" includes any individual who represents a dealer or an issuer in effecting or

attempting to effect sales of securities. **RICHARDSON** acted as an agent of **STARR** under the Act when selling the Investment Contracts.

13. Pursuant to Section 8-6-3(a), Code of Alabama 1975, it is unlawful for any person to transact business in this state as a Dealer or Agent for securities unless he is registered under this article. It is unlawful for any dealer or issuer to employ an agent unless the agent is registered. **RESPONDENTS** are not registered as a Dealer or Agent and have transacted business by effecting securities transactions within the State of Alabama.

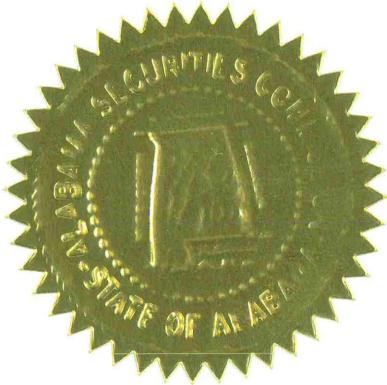
14. Section 8-6-4, Code of Alabama 1975 states: "It is unlawful for any person to offer or sell any security in this state unless it is registered under this article; the security is exempt from registration under Section 8-6-10; or the transaction is exempt under Section 8-6-11." The securities offered and sold by the **RESPONDENTS** were neither registered nor exempt from registration in Alabama at the time of solicitation or sale in violation of this section.

This Order does not prevent the 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.

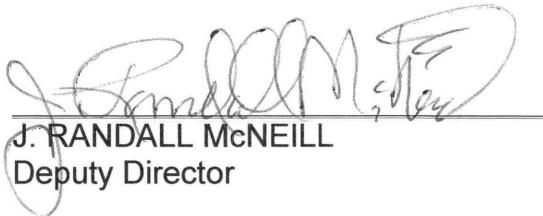
ACCORDINGLY, IT IS HEREBY ORDERED that **STARR INTERNATIONAL TRADE VENTURE**, aka S.I.T.A., aka S.I.T.V. and **PAUL HUEY RICHARDSON** immediately **CEASE AND DESIST** from further offers or sales of any security into, within or from the state of Alabama.

Entered at Montgomery, Alabama, this 17th day of March, 2008



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

BY:



J. RANDALL McNEILL
Deputy Director

**STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION**

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AKA S.I.T.A.)
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)

ADMINISTRATIVE ORDER
NO. CD-2008-0008

TO: PAUL HUEY RICHARDSON
1176 COUNTY ROAD 110
LAFAYETTE, AL 36862

NOTICE OF RIGHT TO A HEARING

THE CEASE AND DESIST ORDER TO WHICH THIS NOTICE IS ATTACHED, MADE A PART THEREOF AND INCORPORATED THEREIN, IS IMPORTANT AND YOU SHOULD READ IT IN ITS ENTIRETY. You may request a public hearing before the Alabama Securities Commission concerning this Order by making a written request directed to the Commission pursuant to Section 8-6-32, Code of Alabama 1975. Please direct your request to the Commission as follows:

Alabama Securities Commission
770 Washington Avenue, Suite 570
Montgomery, Alabama 36130-4700

IF A WRITTEN REQUEST FOR A HEARING BEFORE THE ALABAMA SECURITIES COMMISSION IS NOT SUBMITTED WITHIN 28 DAYS AFTER RECEIPT OF THIS ORDER, THIS ORDER SHALL CONSTITUTE A FINAL ORDER OF THE COMMISSION.

In lieu of a formal hearing, you may request an informal meeting with the Director or the Commission staff to resolve the matter. You will not waive your rights to a formal hearing. The Commission staff requests that you submit a verified statement, setting

forth full details concerning your activities giving rise to this Order, no matter whether you are requesting a formal hearing, an informal meeting, or just desire to provide your side of the matter.

Please identify yourself as a Respondent and refer to the Order number when requesting a hearing, informal meeting, or otherwise corresponding with the Commission staff concerning this matter.

Appeals from any final Order of the Commission shall be made to the Circuit Court of Montgomery County, Alabama.



J. RANDALL McNEILL
Deputy Director