

CORRECTED

SECURITIES AND EXCHANGE COMMISSION
Washington, D.C.

SECURITIES EXCHANGE ACT OF 1934
Rel. No. 57655 / April 11, 2008

Admin. Proc. File No. 3-12573

In the Matter of the Application of

DENNIS TODD LLOYD GORDON

AND

STERLING SCOTT LEE

c/o Joel A. Gordon

Joel A. Gordon & Associates

6666 Harwin Drive, Suite 220

Houston, Texas 77036

For Review of Disciplinary Action Taken by

NASD

OPINION OF THE COMMISSION

REGISTERED SECURITIES ASSOCIATION -- REVIEW OF DISCIPLINARY
PROCEEDINGS

Violations of Rules of Fair Practice

Permitting Unregistered Individual to Function as Principal

Failing to Maintain Accuracy of Membership Application

Charging Excessive Markups

Failing to Disclose Markups on Customer Confirmations

Individuals who served, respectively, as (a) chairman, chief executive officer, and principal and (b) president, chief compliance officer, and principal of former NASD member firm (1) permitted an unregistered individual to function as a principal of the firm, (2) failed to maintain the accuracy of the firm's membership application, and (3) charged retail customers excessive markups. President was responsible for firm's failure to disclose those markups on customer confirmations. Held, association's findings of violations and sanctions imposed are sustained in part and set aside in part.

UNITED STATES OF AMERICA
before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Rel. No. 57655 / April 11, 2008

Admin. Proc. File No. 3-12573

In the Matter of the Application of

DENNIS TODD LLOYD GORDON

AND

STERLING SCOTT LEE

c/o Joel A. Gordon

Joel A. Gordon & Associates

6666 Harwin Drive, Suite 220

Houston, Texas 77036

For Review of Disciplinary Action Taken by

NASD

ORDER SUSTAINING IN PART AND SETTING ASIDE IN PART DISCIPLINARY
ACTION TAKEN BY REGISTERED SECURITIES ASSOCIATION

On the basis of the Commission's opinion issued this day, it is

ORDERED that NASD's findings that Dennis Todd Lloyd Gordon and Sterling Scott Lee violated NASD Rules 1021 and 2110 and were responsible for violations of Article IV, Section 1(c) and Article V, Section 1 of NASD's By-Laws and the sanctions imposed by NASD for these violations be, and they hereby are, sustained; and it is further

ORDERED that NASD's findings that Gordon and Lee violated NASD Rules 2110 and 2440 and IM-2440 and that Lee violated Exchange Act Section 10(b) and was responsible for violations of Exchange Act Rule 10b-10 be, and they hereby are, sustained; and it is further

ORDERED that NASD's findings that Gordon and Lee violated Exchange Act Rule 10b-5 and NASD Rules 2120 and 2230 and that Gordon violated Exchange Act Section 10(b) and was responsible for violations of Exchange Act Rule 10b-10 be, and they hereby are, set aside; and it is further

