

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

U.S. COMMODITY FUTURES)
TRADING COMMISSION and)
OKLAHOMA DEPARTMENT OF)
SECURITIES ex rel. IRVING . L)
FAUGHT,)

Plaintiffs,)

v.)

PRESTIGE VENTURES CORP., a)
Panamanian corporation, FEDERATED)
MANAGEMENT GROUP, INC. A Texas)
corporation, KENNETH WAYNE LEE an)
individual, and SIMON YANG (a/k/a)
XIAO YANG a/k/a SIMON CHEN), an)
individual,)

Defendants, and)

SHEILA M. LEE, an individual, DAVID A.)
LEE, an individual, and DARREN A. LEE,)
an individual,)

Relief Defendants,)

Case No. 09-CV-1284 (DLR)

Defendant Kenneth W. Lee's and
Relief Defendants Sheila Lee, David
Lee and Darren Lee Response to
PLAINTIFFS' PROPOSED
FINDINGS OF FACT,
CONCLUSIONS OF LAW, AND
ORDER

ENTRY OF APPEAL
PLEASE ENTER ME, KENNETH W. LEE, AS REPRESENTING MYSELF IN THE
ABOVE CAPTIONED MATTER

I am not an attorney nor do I represent myself to have any skills in such matters. I have over 18 inches of legal documents in front of me that I have no idea what most of it means. I am having to represent myself, as no attorney would take this matter pro-bono. I have no way to retain them with my house and bank accounts frozen in the courts. I am trying to research the proper way to address the respected courts in this matter and am having difficulties understanding what exactly I am reading. I am going to have trouble addressing the plaintiffs arguments where cases are listed because I do not know how to look up those cases which could be detrimental, or beneficial, to my case.

As stated in and response to **PLAINTIFFS' PROPOSED FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER** , dated November 18, 2010.

I. SUMMARY

Kenneth W. Lee denies that he received funds from Prestige Ventures that were not directly his or produced by his efforts in previous business ventures and the results were caused to be invested in Prestige Ventures investments. Relief Defendants Sheila, David and Darren Lee also caused investments of personal funds be invested into Prestige Ventures and were entitled to these funds and could direct them to any action they desired. To claim that Defendant Kenneth Lee and Relief Defendants Sheila, David and Darren Lee invested only the small amounts that are indicated by the Plaintiffs is not correct.

Plaintiffs have continued to ignore any evidence produced by Defendant Kenneth Lee and Relief Defendants Sheila, David and Darren Lee to justify their cause in taking possession of any properties that Defendant and Relief Defendants purchased with their funds.

II. FACTS

1. *Monies Received from investors*

The investments the Plaintiffs claim were invested by investors is greatly inflated. Duplication of investments has been made and Plaintiffs will not admit to not knowing where over \$1,300,000 in cash came from. They admit they can not prove where these funds came from or who deposited them, yet they claim to know exactly how much Defendant Kenneth Lee and Relief Defendants Sheila, David and Darren Lee invested in Prestige Ventures. Plaintiffs can not dispute the fact that Defendant and Relief Defendants deposited some of the \$1,300,000 cash.

2. Defendant Kenneth Lee provided copies of cashiers checks invested into an account for the Lee Family in Panama in the year 2002. Lee also provided copies of email exchanges between Lee and the account managers in Panama and a customer who invested in Federated Management and Prestige Ventures in the year 2003. These documents are not mentioned in Plaintiffs Motion For Order to the Court. Only their self serving information. No mention that Lee did provide these documents to the Plaintiffs, and in a personal letter to the Court.

3. Defendant Lee also disputes the amount indicated by Plaintiffs that the amount returned

to investors was \$3,357,732. Prestige Ventures returned over \$4,300,000 to investors, again these numbers are in the favor of the Plaintiffs and reflect against Defendants and Relief Defendants. If Plaintiffs can not prove the deposits of \$1,300,000 in cash then I do not feel their indicated amount of only \$3,357,732 can be trusted to be accurate. These inaccuracies always benefit the Plaintiffs and never the Defendants. Just as Plaintiffs have never admitted that Defendants did have funds invested in Prestige Ventures.

Exhibit 1: Copies of cashiers checks invested for the Lee Family.

Exhibit 2: Copies of email between Panama Management and Kenneth Lee

Exhibit 3: Copies of Email Between Kenneth Lee and Dingxiang Lin Agreeing To Transfer Funds For Lin and Lee To Exchange Prestige Account Positions

III. ARGUMENT

A. Defendants Lee, Relief Defendants Sheila, David Lee and Darren Lee Should Lose Their Property And Be Required To Pay Fines And Penalties.

1. Request To The Court

Defendant Kenneth W. Lee and Relief Defendants Sheila, David and Darren Lee acknowledges that the respected Court is granted the duty of deciding what it may consider “appropriate”. Plaintiffs have not offered any options in an agreement to settle and allow the Lee Family to remain in their respective homes and offer a payment plan that would accomplish the results that I am sure The Court would desire to see for the benefit of all.

2. Defendant Kenneth Lee and Relief Defendants Sheila, David and Darren Lee Prayerfully ask The Honorable Court to consider the hardships that will be placed on a family that is struggling to live due to the case at hand.
3. Defendant Lee proposed a settlement offer to the Plaintiffs and their response was cruel and without any consideration for a possible settlement that would be more productive to the investors.

IV. CONCLUSION

Defendant Kenneth Lee and Relief Defendants Sheila, David and Darren Lee deny the allegation that the amounts indicated by Plaintiffs were ever invested with Federated Management or Prestige Ventures. The amounts are inflated and in many cases amounts are duplicated to inflate the total amount. Plaintiffs sent what they called evidence to these facts in the form of a CD that no one could open much less review to dispute these alleged amounts. The Plaintiffs admitted to Defendant Kenneth Lee that they could not account for over \$1,300,000 invested into the program, so they just assumed it was from investors and would not admit that perhaps some of this amount could belong to the Lee Family. The Lee Family were also investors in this program and were entitled to their personal investment results just as all others including Mr Simon Yang. For the Plaintiffs to demand The Court take the properties purchased by Defendant Lee and Relief Defendants is wrong and self serving by Plaintiffs. Each time Defendant Lee stated that the Lee Family had monies invested in Prestige Ventures

Plaintiffs brushed it off and would not discuss it and simply ignored this fact.

Defendant Kenneth Lee and Relief Defendants Sheila, David and Darren Lee respectfully request

The Court deny **PLAINTIFFS' PROPOSED FINDINGS OF FACT, CONCLUSIONS**

OF LAW, AND ORDER and allow Defendant Lee to work with The Honorable Court to

arrive at a settlement plan that would allow Defendant and Relief Defendants to retain their

properties as rightfully theirs and allow Defendant Lee to work in a way deemed appropriate by

The Court to settle this matter in a fair and equitable manner.

Dated: November 23rd, 2010

Respectfully Submitted,

Kenneth Wayne Lee
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Mount Pleasant, SC 29466
Telephone - 843-814-3877

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1660 Jorrington Street
Mount Pleasant, SC 29466

David A. Lee
2676 Palmetto Hall Blvd
Mt Pleasant, SC 29466

Darren A. Lee
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CERTIFICATE OF SERVICE

I hereby certify that, on November 23rd, 2010, I caused one copy of **Defendant Kenneth W. Lee's and Relief Defendants Sheila Lee, David Lee and Darren Lee Response to PLAINTIFFS' PROPOSED FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER** to be served by U.S. Mail on the following:

James H. Holl III
1155 21st Street NW
Washington, DC 20581

Terra Shamas Bonnell
Oklahoma Department of Securities
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