FILED

FEB 22 2012

DEPARTMENT OF REAL ESTATE

By L. Jones

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Notice of Intention to Bar RAYMOND LORENZO JETER, an Individual, and WHITFIELD FINANCIAL SERVICES, INC., Respondents.	DRE No. H-2567 FR OAH No. 2011020195

DECISION AFTER REJECTION

This matter came on for hearing before David L. Benjamin, Administrative Law Judge, Office of Administrative Hearings, in Oakland, California, on June 7 and July 26, 2011.

Kenneth C. Espell, Counsel, represented the Complainant. Respondent, Raymond Lorenzo Jeter (herein "Respondent Jeter"), appeared in person and represented himself.

Evidence was received, the record was closed, and the matter was submitted.

On September 20, 2011, the Administrative Law Judge rendered a Proposed Decision which the Acting Real Estate Commissioner declined to adopt as her Decision herein. Pursuant to Section 11517 of the Government Code of the State of California, Respondent was served with Notice of the Acting Real Estate Commissioner's determination not to adopt the Proposed Decision along with a copy of the Proposed Decision. Respondent was notified that the case would be decided by the Acting Real Estate Commissioner upon the record, the

transcript of proceedings held on July 26, 2011, and upon written argument offered by Respondent Jeter and Complainant.

Written argument was not timely submitted by Respondent Jeter. Written argument has been submitted on behalf of Complainant.

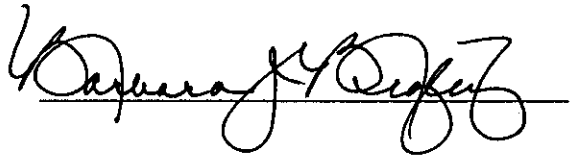
I have given careful consideration to the record in this case, including the transcript of proceedings of July 26, 2011, and written argument offered by Complainant.

The Proposed Decision herein dated September 20, 2011, is hereby adopted as the Decision of the Acting Real Estate Commissioner.

This Decision shall become effective immediately.

IT IS SO ORDERED 3/21, 2012.

BARBARA J. BIGBY
Acting Real Estate Commissioner



FILED

OCT 21 2011

DEPARTMENT OF REAL ESTATE

By R. Jones

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Bar Order Against RAYMOND LORENZO JETER, an individual, and WHITFIELD FINANCIAL SERVICES, INC., Respondents.	No. H-2567 FR OAH No. 2011020195 (As to Raymond Lorenzo Jeter only)

NOTICE

TO: RAYMOND LORENZO JETER, Respondent.

YOU ARE HEREBY NOTIFIED that the Proposed Decision herein dated September 20, 2011, of the Administrative Law Judge is not adopted as the Decision of the Real Estate Commissioner. A copy of the Proposed Decision dated September 20, 2011, is attached for your information.

In accordance with Section 11517(c) of the Government Code of the State of California, the disposition of this case will be determined by me after consideration of the record herein including the transcript of the proceedings held on June 7 and July 26, 2011, and any written argument hereafter submitted on behalf of Respondent and Complainant.

Written argument of Respondent to be considered by me must be submitted within 15 days after receipt of the transcript of the proceedings of June 7 and July 26, 2011, at the Sacramento office of the Department of Real Estate, unless an extension of the time is granted for good cause shown.

Written argument of Complainant to be considered by me must be submitted within 15 days after receipt of the argument of Respondent at the Sacramento office of the Department of Real Estate, unless an extension of the time is granted for good cause shown.

DATED: 10/20/2011

BARBARA J. BIGBY
Acting Real Estate Commissioner

By WAYNE S. BELL
Chief Counsel

BEFORE THE
DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Bar Order Against: RAYMOND LORENZO JETER, an individual, and WHITFIELD FINANCIAL SERVICES, INC., Respondents.	Case No. H-2567 FR OAH No. 2011020195

PROPOSED DECISION

Administrative Law Judge David L. Benjamin, State of California, Office of Administrative Hearings, heard this matter in Oakland, California, on June 7 and July 26, 2011.

Kenneth C. Espell, Real Estate Counsel II, represented Real Estate Commissioner Jeff Davi.

Respondent Raymond Lorenzo Jeter appeared on his own behalf.

There was no appearance by or on behalf of Whitfield Financial Services, Inc.

The matter was submitted on July 26, 2011.

FACTUAL FINDINGS

1. On December 7, 2010, Real Estate Commissioner Jeff Davi issued a "Notice of Intent to Issue Bar Order and Bar Order" (Notice) against Raymond Lorenzo Jeter and Whitfield Financial Services, Inc. (WFSI). The Notice, issued pursuant Business and Professions Code section 10087, states the commissioner's intent to bar Jeter and WFSI from engaging in real estate-related activities for 36 months, effective December 7, 2010. Jeter (respondent) filed a timely request for hearing. No request for hearing was filed by WFSI, and there was no appearance by or on behalf of the corporation. Under Business and Professions Code section 10087, subdivision (b), the corporation's failure to request a hearing constitutes a waiver of its right to a hearing. WFSI is not a respondent in this proceeding.

2. Prior to December 21, 2009, respondent was licensed by the Department of Real Estate as a real estate broker, and WFSI was licensed by the department as a corporate real estate broker. Respondent was the designated officer of WFSI.

3. On December 30, 2008, in Case No. 2328 FR, the commissioner issued to WFSI an Order to Desist and Refrain. The Order alleged that WFSI had been collecting advance fees from homeowners to renegotiate their mortgage loans, without submitting the advance fee contract to the department for its approval.

4. On December 31, 2008, in Case No. 2329 FR, the commissioner issued an accusation against Jeter and WFSI. Among other alleged causes for discipline, the accusation alleged that respondents improperly collected advance fees.

5. On November 16, 2009, respondent and WFSI voluntarily surrendered their licenses. The commissioner accepted the surrender on November 30, 2009, effective December 21, 2009.

6. The Notice issued on December 7, 2010, alleges that by the terms of the surrender of their licenses respondent and WFSI "admitted to the allegations in the underlying accusation." That is not the case. In his declaration tendering the surrendering of his own license and the corporate license, respondent stated that "[t]his Declaration is not an admission by myself and/or WHITFIELD FINANCIAL SERVICES INC. as to the allegations in the Accusation." Respondent agreed only that the commissioner could accept the allegations as true for the purpose of deciding to grant relicensure to either party.

Allegations of post-surrender activities for which a real estate license is required

7. Paragraph 4 of the Notice alleges, in relevant part, as follows:

> Despite surrendering their licenses, WFSI and JETER continued to attempt to collect advanced fees for loan modification services in violation of Sections [*sic*] 10130 (Real estate license required) of the California Business and Professions Code . . . by the employment of fraud and/or misrepresentation. The attempts included, but are not limited to, the employment of a collection agency as the agent for WFSI and JETER, to pressure individuals to pay WFSI and/or JETER illegal advance fees for loan modification services. JETER sent approximately 200 to 300 "client" names to the collection agency for assistance in collecting the illegal advance fees. Despite the surrender of their licenses, WFSI and JETER continued efforts to collect illegal advance fees. Some individuals, including those listed below, were contacted by the collection agency and were threatened with collection lawsuits and/or entries of negative information on their credit reports if they failed to pay.

The individuals identified in Paragraph 4 are Steven C., Tiffany G., Albert W., Randy H. and Emil U.

8. The origin of these allegations is that in early 2010, the department received complaints from consumers that WFSI was improperly collecting advance fees for loan modifications. In letters to the department, and in subsequent conversations with Deputy Real Estate Commissioner Ruben Coronado, Steven C., Albert W. and Randy H. stated that in 2009 they had spoken with respondent or a WFSI representative about obtaining a mortgage loan modification but had never retained their services. Nevertheless, they reported, in early 2010 they had received invoices from a collection company, Southwest Recovery Services, demanding payment of anywhere from $1,800 to $5,900. Commissioner Coronado called Southwest Recovery Services and spoke with Steven Dietz, who stated that his company had received hundreds of electronic files from respondent with the request that Southwest Recovery Services undertake collection efforts on respondent's behalf.

9. It appears from Paragraph 4's reference to Business and Professions Code section 10130 that the gravamen of the charge against respondent is that he conducted licensed activities after the surrender of his license.[1] Merely collecting fees earned prior to license surrender is not a violation of section 10130. Managing Deputy Commissioner Sylvia Yrigollen oversees the department's mortgage loan unit. Yrigollen testified that if a broker surrenders his license while in the process of performing a loan modification, the broker must cease performing licensed activities and cannot perform any further work on the file; the broker, however, is entitled to recover from clients any fees the broker had earned prior to license surrender.

10. No competent evidence was presented at hearing to support the allegation that respondent conducted licensed activities after the surrender of his license. Respondent admits only that, before he surrendered his license, he referred some cases to collection agencies to collect fees he had already earned; he denies performing any loan modifications, or any licensed activities at all, after surrendering his license. None of the individuals identified in Paragraph 4 of the Notice testified at hearing. No one from Southwest Recovery Services testified at hearing. Commissioner Coronado testified to his conversations with Steven C., Albert W., Randy H. and Dietz. Insofar as Coronado's testimony is offered to prove the truth of the statements that were made to him, however, those statements are hearsay. Coronado testified that he is "Prop 115 certified" to testify to hearsay. Whatever his training, however, Government Code 11513, subdivision (d), states that hearsay cannot support a factual finding unless it would be admissible over objection in a civil matter. Respondent objected to the use of hearsay, and no hearsay exception was identified for any

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[1] Under Business and Professions Code section 10130, it is unlawful for any person to act in the capacity of a real estate broker unless that person possesses a real estate license; Business and Professions Code section 10131, subdivision (d), defines a "broker" as a person who negotiates loans for borrowers or lenders in connection with loans secured by real property.

of the out-of-hearing statements of Steven C., Albert W., Randy H. or Dietz. No evidence was presented that would support a factual finding that respondent conducted licensed activities after the surrender of his license.

11. Paragraph 4 refers to the fees respondent sought to collect as "illegal advance fees," and alleges that he used "fraud and/or misrepresentation" to collect them. If Paragraph 4 is also alleging that, after the surrender of his license, respondent engaged in licensed activities by collecting illegal advance fees and by using fraud or misrepresentation to do so, the evidence fails to support those allegations. Again, respondent does not admit that he engaged in licensed activities after he surrendered his license. And, for the same reasons set forth in Finding 10, above, the evidence fails to establish that respondent sought to collect fees from Steven C., Tiffany G., Albert W., Randy H., or Emil U.; that any fees respondent sought to collect from these individuals were "illegal advance fees"; or that respondent used fraud and/or misrepresentation in efforts to collect them.

Allegations of fraudulent billings

12. Paragraph 5 of the Notice alleges, in relevant part, as follows:

> In addition to those individuals who purportedly had a working relationship with WFSI and/or JETER, attempts were made to collect advance fees from individuals who had requested loan modification information through the WFSI website. These individuals did not employ WFSI and/or JETER to perform loan modifications or any services at all. The attempts to collect fees from these non-clients constitutes the employment of fraud and misrepresentation in an attempt to collect fees for services for which WFSI and/or JETER did not have a contract; nor were any services performed.

Paragraph 5 identifies Robert L., Chrystal K. and Kenneth V. as individuals who were invoiced for services "not ordered nor delivered." Like Paragraph 4, the allegations in Paragraph 5 originated with consumer complaints to the department.

13. As was the case with Paragraph 4, the only evidence in support of the allegations in Paragraph 5 is hearsay. Respondent does not admit that he attempted to collect advance fees from non-clients. None of the individuals identified Paragraph 5 testified at hearing. No one from the collection agency testified at hearing. No hearsay exception was identified for any of the out-of-hearing statements of Robert L., Chrystal K. or Kenneth V. No evidence was presented that would support a factual finding regarding the material allegations of Paragraph 5.

Allegation of fraudulent declaration

14. On August 13, 2009, plaintiff Northern California Escrow Services filed a complaint in interpleader in Santa Clara County Superior Court. (Case No. 109CV149748.) The complaint named as defendants WFSI, America's Home Retention Group, Inc. (AHRG), and numerous individuals. The complaint alleged that the individuals had retained either WFSI or AHRG to assist them in modifying their home loans and had deposited into escrow approximately $100,000 as security for fees to be paid to either WFSI or AHRG. Northern California Escrow Services alleged that WFSI and AHRG had asserted conflicting claims to the money held in escrow, and that the escrow company could not safely determine which of the claims was valid. Specifically, plaintiff alleged that, in light of the Desist and Refrain Order that the department had issued to WFSI in December 2008, it was unclear to plaintiff whether WFSI was authorized to collect advance fees.

The complaint in interpleader did not allege that respondent or WFSI had conducted licensed activities after the surrender of their licenses; it could not have done so, as the complaint was filed several months before they surrendered their licenses.

15. Respondent, representing WFSI in the proceeding, filed a declaration on May 25, 2010. In his declaration, respondent asked the court to dismiss the interpleader action and release the interpleaded monies to WFSI. Respondent wrote,

> Whitfield Financial Services Inc[.] surrendered its license on December 21, 2009. As a part of the settlement with the DRE, all clients who were services [*sic*[2]] prior could continue until closure of the files. All parties subject to this pleader [*sic*] were governed under the terms of the pre-exiting [*sic*] contract (ex A).

Respondent signed the declaration under penalty of perjury.

At hearing in this matter, respondent stated that he was referring to a letter he had received from the department, after WFSI surrendered its license, directing WFSI to close its files. Respondent acknowledges that the letter did not authorize him to work on files until the files closed.

16. The Notice alleges that respondent's declaration "constitutes the employment of fraud and/or misrepresentation," in two respects.

17. First, the Notice alleges that respondent failed to disclose to the court that he had surrendered his own broker license, in addition to WFSI's surrender of its corporate broker license. Jeter's failure to inform the court that he had surrendered his personal broker

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[2] At hearing, respondent testified that when he wrote "services" he meant "serviced."

license was not a material omission in the context of the interpleader action. WFSI, not Jeter, was the defendant in that case.

18. Second, the Notice alleges that respondent misrepresented to the court that "the Department permitted WFSI to continue to conduct licensed activities after WFSI and Jeter surrendered their licenses when, in fact, the Department did not entered [*sic*] into an agreement which permitted WFSI to collect illegal advance fees."

The Notice implies that, in his declaration, respondent represented that WFSI had been authorized by the department to collect illegal advance fees. Respondent's declaration contains no such representation.

Nor does the declaration expressly state that WFSI's settlement "permitted WFSI to continue to conduct licensed activities" after the surrender of its license. The declaration states that, under the settlement, "all clients who were [serviced] prior could continue until closure of the files." The document does not explain what is meant by "all clients . . . could continue . . . ." The sentence could be interpreted to mean that the department permitted WFSI to continue to conduct licensed activities, as the Notice alleges. But it could also be interpreted to mean that the department permitted WFSI to collect, from its existing clients, fees that it had earned prior to license surrender. While WFSI was not authorized to perform licensed activities after December 21, 2009, WFSI was not precluded from collecting fees it had earned prior to December 21, fees which would have been governed by its "preexisting contracts" with clients. This interpretation is more consistent with the matters at issue in the interpleader action. The action concerned WFSI's right to fees deposited into escrow before it surrendered its license; the action did not concern WFSI's ability to conduct licensed activities after surrender of its license.

19. Respondent's declaration is sufficiently ambiguous that it cannot support a finding that the declaration was fraudulent or that it constituted a substantial misrepresentation.

LEGAL CONCLUSIONS

1. Under Business and Professions Code section 10087, the commissioner may suspend or bar an unlicensed person from participating in any real estate-related business activity upon a finding that the "suspension or bar is in the public interest and that the person has committed or caused a violation of [division 4 of the Business and Professions Code] or rule or order of the commissioner, which violation was either known or should have been known by the person committing or causing it or has caused material damage to the public." (Bus. & Prof. Code, § 10087, subd. (a)(1).)

2. Section 10087 does not set forth the standard of proof that governs a debarment proceeding. The commissioner argues that, unlike professional licensing proceedings in which the standard of proof is clear and convincing evidence to a reasonable certainty, the weaker standard of preponderance of the evidence applies. The commissioner

does not cite any authority for this argument, which appears to be contrary to the rationale of the court's decision in *Ettinger v. Board of Medical Quality Assurance* (1982) 135 Cal.App.3d 853. It is not necessary, however, to resolve the issue. Even under the weaker standard, the evidence fails to support the material allegations of the Notice.

3. The Notice alleges that respondent "knowingly committed violations of the Real Estate Law." The only statute or rule that respondent is alleged to have violated is Business and Professions Code section 10130 (performing licensed activities without benefit of a license).[3] Since the Notice alleges "fraud and/or misrepresentation," however, it appears to invoke Business and Professions Code section 10176, subdivisions (a) and (i). These provisions state that it is a violation of the Real Estate Law to make "any substantial misrepresentation" (§ 10176, subd. (a)), and to engage in conduct which constitutes fraud or dishonest dealing (§ 10176, subd. (i)).

4. The evidence failed to establish the allegations in Paragraph 4 of the Notice, and therefore failed to establish a violation of Business and Professions Code section 10130, or section 10176, subdivision (a) or (i). (Findings 7 through 11.)

5. The evidence failed to establish the allegations in Paragraph 5 of the Notice, and therefore failed to establish a violation of Business and Professions Code section 10130, or section 10176, subdivision (a) or (i). (Findings 12 & 13.)

6. The evidence failed to establish the allegations in Paragraph 6 of the Notice, and therefore failed to establish a violation of Business and Professions Code section 10130, or section 10176, subdivision (a) or (i). (Findings 14 through 19.)

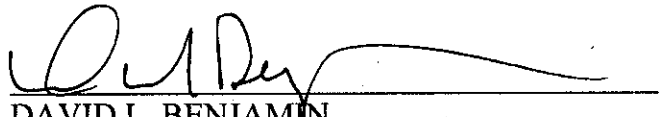
7. Cause to issue a bar order pursuant to Business and Professions Code section 10087 was not established, by reason of Legal Conclusions 4 through 6.

ORDER

Not Adopted

The Notice of Intent to Issue Bar Order and Bar Order against respondent Raymond Alonzo Jeter is dismissed.

DATED: September 20, 2011



DAVID L. BENJAMIN
Administrative Law Judge
Office of Administrative Hearings

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[3] Under Government Code section 11503, a pleading to revoke or suspend a respondent's rights "shall specify the statutes and rules which the respondent is alleged to have violated . . . ."

DEPARTMENT OF REAL ESTATE
P. O. Box 187007
Sacramento, CA 95818-7007

Telephone: (916) 227-0789

FILED

DEC 08 2010

DEPARTMENT OF REAL ESTATE

By R. Henry

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Bar Order Against:	DRE NO. H-2567 FR
RAYMOND LORENZO JETER, an individual, and WHITFIELD FINANCIAL SERVICES, INC.,	NOTICE OF INTENT TO ISSUE BAR ORDER; and BAR ORDER
Respondents	(B&P Code § 10087)

TO: RAYMOND LORENZO JETER (Hereinafter "JETER")
2570 N. First Street, Suite 200
San Jose, CA 95131

WHITFIELD FINANCIAL SERVICES, INC. (Hereinafter "WFSI")
900 E. Hamilton Ave., Suite 100
Campbell, CA 95008

Pursuant to Section 10087(b) of the California Business and Professions Code (hereinafter "the Code"), you are hereby notified of the intention of the California Real Estate Commissioner (hereinafter "Commissioner") to issue a Bar Order pursuant to Section 10087(a) of the California Business and Professions Code.

Pursuant to the authority granted by Section 10087 of the Code, and after review and consideration of the following facts, the Commissioner makes the following:

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FINDINGS OF FACT

1. On or about December 21, 2009, in Department of Real Estate Case Number H-02329 FR, the Commissioner accepted the voluntary surrender of the WFSI corporate real estate broker license and by terms of the surrender WFSI admitted to the allegations contained in the underlying accusation.

2. On or about December 21, 2009, in Department of Real Estate Case Number H-02329 FR, the Commissioner accepted the voluntary surrender of the JETER's personal broker license and his designated officer of WFSI and by terms of the surrender JETER admitted to the allegations contained in the underlying accusation.

3. The accusation in Department of Real Estate Case Number H-02329 FR alleged that WFSI and JETER were, among other allegations, collecting illegal advance fees for loan modification services.

4. Despite surrendering their licenses, WFSI and JETER continued to attempt to collect advanced fees for loan modification services in violation of Sections 10130 (Real estate license required) of the California Business and Professions Code (hereinafter the "Code") by the employment of fraud and/or misrepresentation. The attempts included, but are not limited to, the employment of a collection agency as the agent for WFSI and JETER to pressure individuals to pay WSFI and/or JETER illegal advance fees for loan modification services. JETER sent approximately 200 to 300 "client" names to the collection agency for assistance in collecting the illegal advance fees. Despite the surrender of their licenses, WFSI and JETER continued efforts to collect illegal advance fees. Some individuals, including those individuals listed below, were contacted by the collection agency and were threatened with collection lawsuits and/or entries of negative information on their credit reports if they failed to pay.

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Date of Attempted Collection	Individual	Amount Claimed
January 21, 2010	Steven C.	$5,864.00
January 21, 2010	Tiffany G.	$2,639.00
January 21, 2010	Albert W.	$3,354.00
January 21, 2010	Randy H.	$3,908.00
January 21, 2010	Emil U.	$1,746.00

5. In addition to those individuals who purportedly had a working relationship with WFSI and/or JETER, attempts were made to collect advance fees from individuals who had requested loan modification information through the WFSI website. These individuals did not employ WFSI and/or JETER to perform loan modifications or any services at all. The attempts to collect fees from these non-clients constitutes the employment of fraud and misrepresentations in an attempt to collect fees for services for which WFSI and/or JETER did not have a contract; nor were any services performed. Some of the individuals invoiced for services not ordered nor delivered are listed below.

Date of Attempted Collection	Individual	Amount Claimed
June 10, 2009	Robert L.	$1,350.00
June 10, 2009	Chrystal K.	$1,315.00
January 21, 2010	Kenneth V.	$3,495.00

6. On or about May 25, 2010 in *Northern California Escrow v. Jeter, et al.*, Santa Clara County Superior Court Case Number 109 CV 149748, Jeter, in a declaration under penalty of perjury, acknowledged to the court that WFSI surrendered its real estate license on December 21, 2009, but failed to acknowledge that he also surrendered his personal broker license. In addition, Jeter went on to state "(a)s part of the settlement with the DRE, all clients who were services could continue until closure of the files." (*sic*). Jeter's sworn declaration

constitutes the employment of fraud and/or misrepresentation by representing to the court that the Department permitted WFSI to continue to conduct licensed activities after WFSI and Jeter surrendered their licenses when, in fact, the Department did not entered into an agreement which permitted WFSI to collect illegal advance fees.

CONCLUSIONS OF LAW

Based on the findings set forth above, the Commissioner has determined that:

(A) A Bar Order is in the public interest;

(B) Respondent has knowingly committed violations of the Real Estate Law; and,

(C) Respondent's violations of the Real Estate Law have caused material damage to the public.

ORDER

NOW, THEREFORE, IT IS ORDERED that, pursuant to the authority of Section 10087 of the Code, RAYMOND LORENZO JETER and WHITFIELD FINANCIAL SERVICES, INC., are hereby barred and prohibited for a period of thirty-six (36) months from the effective date of this Bar Order, from engaging in any of the following activities in the State of California:

(A) Holding any position of employment, management, or control in a real estate business;

(B) Participating in any business activity of a real estate salesperson or a real estate broker;

(C) Engaging in any real estate related business activity on the premises where a real estate salesperson or real estate broker is conducting business; and, Participating in any real estate related business activity of a finance lender, residential mortgage lender, bank, credit union, escrow company, title company, or underwritten title company.

NOTICE OF RIGHT AND OPPORTUNITY FOR A HEARING

Pursuant to Section 10087 of the Code, you have the right to request a hearing under the California Administrative Procedure Act (Chapter 4.5 – commencing with Section 11400 of the Government Code). If you desire a hearing, you must submit a written request within fifteen (15) days after the mailing or service of this "*PRELIMINARY BAR ORDER; NOTICE OF INTENT TO ISSUE BAR ORDER; and BAR ORDER*" The request may be in any form provided it is in writing, includes your current return address, and indicates that you want a hearing, is signed by you or on your behalf, and is delivered or mailed to the Department of Real Estate, P. O. Box 187007, Sacramento, California, 95818-7007, Attention Legal Section, or is delivered personally to the offices of the Department of Real Estate, 2201 Broadway, Sacramento, California.

If no hearing is requested within said fifteen (15) day time period, your failure to request a hearing shall constitute a waiver of the right to a hearing.

THIS BAR ORDER IS EFFECTIVE IMMEDIATELY.

It is so ordered on 12/7/2010.

JEFF DAVI
Real Estate Commissioner

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RAYMOND JETER

P.O. Box 2573
Campbell, CA
(650) 989-2975

900 East Hamilton Avenue, Suite 100
Campbell, CA 95008
(408) 899-3531

2570 North First Street, Suite 200
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KCE