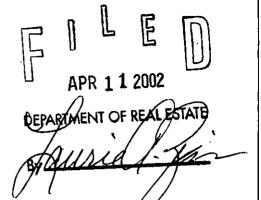
Department of Real Estate P. O. Box 187000 Sacramento, CA 95818-7000 Telephone: (916) 227-0789



BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

TO:

LUCY DOWNING,

No. H-2717 SD

ORDER TO DESIST AND REFRAIN
(B&P Code Section 10086)

The Real Estate Commissioner of the State of California has determined from the findings herein set forth below that you have violated Section 10130 of the California Business and Professions Code (hereinafter "Code") by engaging in the business of a real estate broker within the State of

California without a real estate license.

On or about May 26, 1997, the real estate salesperson license of you, LUCY DOWNING expired and was not renewed.

ΙI

During a period of time from on or after May 26, 1997 and continuing thereafter, you, for or in expectation of a compensation, negotiated with various borrowers and/or lenders

in connection with arranging loans secured directly or 2 collaterally by liens on real property including, but not 3 limited to, the following: 4 **BORROWER** PROPERTY 5 Michael S. Williams & Toya 901 Sonia Place 6 Carter-Williams Escondido, California III 8 The acts described in Paragraph II above, are acts 9 requiring a real estate broker license under the provisions of Section 10131(d) of the Code. 11 IV 12 You violated Section 10130 of the Code by engaging in 13 the activities described above, in Paragraph II above, without 14 first obtaining a real estate broker license from the 15 Department. DATED: Much 38, 2002 16 17 PAULA REDDISH ZINNEMANN Real Estate Commissioner 18 19 20 21 LUCY DOWNING 1735 Caudor Street 22 Encinitas, CA 92024 23 24 25

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