

1 DEPARTMENT OF REAL ESTATE  
2 320 W. 4<sup>th</sup> Street, Suite 350  
3 Los Angeles, CA 90013

4 Telephone: (213) 576-6982

**FILED**

MAY 16 2012

5 DEPARTMENT OF REAL ESTATE  
6 BY: 

7  
8 STATE OF CALIFORNIA

9 DEPARTMENT OF REAL ESTATE

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11 To: )  
12 ) NO. H-38141 LA  
13 INSTANT RESULTS 2 MARKETING, LLC; )  
14 INSTANT RESULTS FINANCIAL; ) ORDER TO DESIST AND  
15 CARL HUGHLEY; and MIKE DAVIDSON, ) REFRAIN  
16 Respondents. ) (B&P Code Section 10086)  
17 )  
18 )

19 The Commissioner (Commissioner) of the California  
20 Department of Real Estate (Department) caused an investigation to  
21 be made of the activities of INSTANT RESULTS 2 MARKETING, LLC  
22 ("IRM"), INSTANT RESULTS FINANCIAL ("IRF"), CARL HUGHLEY  
23 ("HUGHLEY"), and MIKE DAVIDSON ("DAVIDSON"). Based on the  
24 investigation, the Commissioner has determined that IRM, IRF,  
25 HUGHLEY and DAVIDSON have engaged in, are engaging in, or are  
26 attempting to engage in, acts or practices constituting  
27 violations of the California Business and Professions Code  
("Code") including the business of, acting in the capacity of,  
and/or advertising or assuming to act as, a real estate broker in

1 the State of California within the meaning of Code Sections  
2 10131(a) (soliciting and obtaining listings, and negotiating the  
3 purchase, sale or exchange of real property) and 10131.2  
4 (charging an advance fee in connection with the purchase, sale,  
5 exchange or listing of real property). Furthermore, based on the  
6 investigation, the Commissioner hereby issues the following  
7 Findings of Fact, Conclusions of Law, and Desist and Refrain  
8 Order under the authority of Section 10086 of the Code.

9 Whenever acts referred to below are attributed to TG or  
10 WEST, those acts are alleged to have been done by IRM, IRF,  
11 HUGHLEY or DAVIDSON, acting by themselves, or by and/or through  
12 one or more agents, associates, affiliates, and/or co-  
13 conspirators.

14  
15 FINDINGS OF FACT

16 1. At no time herein mentioned has IRM, IRF, HUGHLEY or  
17 DAVIDSON been licensed by the Department in any capacity.

18 2. During the period of time set out below, IRM, IRF,  
19 HUGHLEY and/or DAVIDSON solicited real property listings and  
20 collected an advance fee to do one or more of the following  
21 acts for another or others, for or in expectation of  
22 compensation: offer to list for sale, and negotiate the  
23 purchase, sale or exchange of interests in real property, to  
24 wit: timeshares.

25 3. For an unknown period of time prior to December, 2010,  
26 through and including the present time, IRM, IRF, HUGHLEY and  
27 DAVIDSON advertised, and continue to advertise, their services

1 under the business names INSTANT RESULTS 2 MARKETING, LLC and  
2 INSTANT RESULTS FINANCIAL by telephone and on a website located  
3 at <http://www.instantresults2marketing.com>. Those  
4 advertisements solicited, and continue to solicit for sale  
5 listings and offer to arrange purchases, sales or exchanges of  
6 timeshare properties in exchange for the payment of an advance  
7 fee.

8 4. On or about December 16, 2010, IRM, IRF, HUGHLEY and  
9 DAVIDSON entered into a written agreement with Abraham H.  
10 concerning the sale or exchange of his timeshare property  
11 located in Florida, obligating Abraham H. to pay to IRM, IRF,  
12 HUGHLEY and DAVIDSON as their advance fee for services \$2,037  
13 in violation of Code Sections 10130, 10131(a) and 10131.2.

14 5. On or about December 23, 2010, IRM, IRF, HUGHLEY and  
15 DAVIDSON entered into a written agreement with LuAnn G.  
16 concerning the sale or exchange of her timeshare property  
17 located in Las Vegas, Nevada, obligating LuAnn G. to pay to  
18 IRM, IRF, HUGHLEY and DAVIDSON as their advance fee for  
19 services \$1,861 in violation of Code Sections 10130, 10131(a)  
20 and 10131.2.

#### 21 CONCLUSIONS OF LAW

22 6. Based on the findings of fact contained in paragraphs  
23 1 through 5, IRM, IRF, HUGHLEY and DAVIDSON, acting by  
24 themselves, or by and/or through one or more agents,  
25 associates, affiliates, and/or co-conspirators  
26 solicited real property listings and collected an  
27 advance fee to do one or more of the following acts

1 for another or others, for or in expectation of  
2 compensation: offer to list for sale, and/or negotiate  
3 the purchase, sale or exchange of interests in real  
4 property, to wit: timeshares, which requires a real  
5 estate license under Code Sections 10131(a) and  
6 10131.2, during a period of time when neither IRM,  
7 IRF, HUGHLEY nor DAVIDSON were licensed by the  
8 Department in any capacity, in violation of Code  
9 Section 10130.

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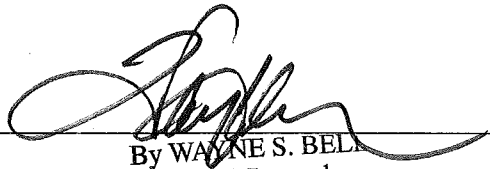
15  
16 DESIST AND REFRAIN ORDER

17 Based on the Findings of Fact and Conclusions of Law  
18 stated herein, INSTANT RESULTS 2 MARKETING, LLC, INSTANT RESULTS  
19 FINANCIAL, CARL HUGHLEY, and MIKE DAVIDSON ARE HEREBY ORDERED to  
20 immediately desist and refrain from performing any acts within  
21 the State of California for which a real estate broker license is  
22 required, and in particular, doing one or more of the following  
23 acts for another or others, for or in expectation of  
24 compensation: offer to list for sale, and/or negotiate the  
25 purchase, sale or exchange of interests in real property, unless  
26 and until INSTANT RESULTS 2 MARKETING, LLC, INSTANT RESULTS  
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1 FINANCIAL, CARL HUGHLEY, and MIKE DAVIDSON obtain a real estate  
2 broker license issued by the Department.

3 DATED: May 7, 2012.

5 Real Estate Commissioner

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9 By WAYNE S. BELL  
10 Chief Counsel

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13 **Notice:** Business and Professions Code Section 10139 provides  
14 that "Any person acting as a real estate broker or real estate  
15 salesperson without a license or who advertises using words  
16 indicating that he or she is a real estate broker without being  
17 so licensed shall be guilty of a public offense punishable by a  
18 fine not exceeding twenty thousand dollars (\$20,000), or by  
imprisonment in the county jail for a term not to exceed six  
months, or by both fine and imprisonment; or if a corporation, be  
punished by a fine not exceeding sixty thousand dollars  
(\$60,000)."

19 cc: INSTANT RESULTS 2 MARKETING, LLC  
20 7200 Lake Ellenor Drive  
Orlando, FL 32809

21 INSTANT RESULTS FINANCIAL  
22 515 S. Flower Street, Floor 36  
Los Angeles, CA 90071

23 CARL HUGHLEY  
24 8615 Commodity Circle, Suite 16  
Orlando, FL 32819

25 MIKE DAVIDSON  
26 515 S. Flower Street, Floor 36  
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