

1 PRESTON DuFAUCHARD
California Corporations Commissioner
2 WAYNE STRUMPFER
Deputy Commissioner
3 ALAN S. WEINGER (CA BAR NO. 86717)
Supervising Attorney
4 JUDY L. HARTLEY (CA BAR NO. 110628)
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5 Department of Corporations
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7 Attorneys for Complainant
8

9 BEFORE THE DEPARTMENT OF CORPORATIONS
10 OF THE STATE OF CALIFORNIA
11

12 In the Matter of the Accusation/Statement of) OAH Case No. L-2006060871
Issues of THE CALIFORNIA)
13 CORPORATIONS COMMISSIONER,) File Nos.: 100-1658; 100-2626; 100-2627; 100-
2628; 603C072; 603C073; & 603C074
14 Complainant,)
15 vs.) AGREEMENT RE: SETTLEMENT
16)
17 DOLLARWORKS, INC. and)
DOLLARWORKS, LLC,)
18 Respondents.)
19

20 The parties hereby acknowledge that they have been unable to agree upon a formal
21 settlement agreement, and pursuant to paragraph 10 of the Memorandum of Understanding entered
22 into between the parties on September 15, 2006 (“Memorandum of Understanding”), a true and
23 correct copy of which is attached hereto as Exhibit A, hereby agree that the Memorandum of
24 Understanding shall be the final settlement agreement between the parties in this matter.

25 Dated: 11/6/06 PRESTON DuFAUCHARD
California Corporations Commissioner

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27 By ALAN S. WEINGER, Supervising Attorney
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Dated: _____

DOLLARWORKS, INC.

By _____
DAVID WALKER, President

Dated: _____

DOLLARWORKS, LLC

By _____
DAVID WALKER, President

APPROVED AS TO FORM AND CONTENT:

MALEK & MALEK

By _____
STEVEN GOURLEY, Attorneys for
DOLLARWORKS, INC. and DOLLARWORKS, LLC

PRESTON DuFAUCHARD
California Corporations Commissioner

By _____
JUDY L. HARTLEY
Senior Corporations Counsel

State of California - Department of Corporations

1 Dated: 10-25-06

DOLLARWORKS, INC.

2 By _____
3 DAVID WALKER, President

4 Dated: 10-25-06

DOLLARWORKS, LLC

6 By _____
7 DAVID WALKER, President

8
9 APPROVED AS TO FORM AND CONTENT:

10 MALEK & MALEK

11
12 By _____
13 STEVEN GOURLEY, Attorneys for
DOLLARWORKS, INC. and DOLLARWORKS, LLC

14
15 PRESTON DuFAUCHARD
California Corporations Commissioner

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17 By _____
18 JUDY L. HARTLEY
19 Senior Corporations Counsel

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Memorandum of Understanding between

The California Commissioner of Corporations
Complainant,

OA H No. L2006060871

And

Dollarworks, Inc. and
Dollarworks, LLC

Respondent

The parties agree as follows:

1. Dollarworks, LLC is added to the captioned case as a Respondent.
2. The California Deferred Deposit Transaction Law license issued to Dollarworks, Inc. is revoked.
3. The California Finance Lender Law license issued to Dollarworks, LLC, was submitted to the Department of Corporations for surrender. In error, the Department accepted the surrender.
4. The Respondents withdraw all pending license applications filed by them with the Department of Corporations
5. The Respondents stipulate that the Complainant could establish a prima facie case to support the allegations set forth in the accusation.
6. The Respondents choose not to present a defense to the charges brought by the Complainant.
7. David Walker agrees that for a period of 10 years commencing on the effective date of the signed stipulation he will not personally apply for either a California Deferred Deposit Transaction Law license or A California Finance Lender Law license nor will he make such an application through any business entity owned and/or controlled by him.
8. After the 10 years have elapsed, should David Walker, whether individually or through any business entity owned and/or controlled by him, apply to the California Department of Corporations for a license, the allegations set forth in the instant accusation shall be deemed to have been admitted.
9. The statements and admissions contained in this agreement are applicable only to the instant case and shall not be used, and the parties do not intend these statements and admissions to be used, as admissions, res judicata, or collateral estoppel in any other action.

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EXHIBIT A

10. The parties intend to draft a formal agreement memorializing this settlement. In the event, the parties are unable to agree upon a formal agreement, this Memorandum of Understanding may be used as the final agreement between the parties.

Signed this 15th day of September 2006 at Los Angeles, California.

Judy L. Hartley
Senior Trial Counsel
Department of Corporations

Steven C. Thompson
Special Administrator

David Walker
President

Steven Gourley
Attorney for Respondents