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2 **STATE OF CALIFORNIA**  
3 **BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY**  
4 **DEPARTMENT OF BUSINESS OVERSIGHT**

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7 TO: Fei Mu Havenor  
8 4565 Ruffner Street, Suite 104  
9 San Diego, CA 92111

10 **DESIST AND REFRAIN ORDER**  
11 **(For violation of section 25210 of the California Corporations Code)**

12 The Commissioner of Business Oversight finds that:

13 1. Fei Mu Havenor (“Havenor”) is a California resident. Beginning in at least 2011 and  
14 at all relevant times, Havenor did business at 4565 Ruffner Street, Suite 104, San Diego, California  
15 92111. Havenor is a licensed insurance broker with the California Department of Insurance, License  
16 No. 0F60241.

17 2. Beginning in at least 2011 and at all relevant times, Havenor offered, negotiated and  
18 sold securities to investors in California in the form of investment contracts called Non-Recourse  
19 Secured Promissory Notes (“Notes”).

20 3. Havenor represented to potential investors that they would receive back their principal  
21 funds, in addition to specified rates of interest, through the Notes. Havenor represented to the  
22 investors that the Notes were a secured investment. Several California investors invested in the  
23 Notes and Havenor received compensation from the issuer Worldwide Diamond Ventures, LP as a  
24 result of the offering and sale of the Notes. Havenor thereby acted as a broker-dealer by engaging in  
25 the business of effecting transactions in securities in this state for the account of others or for her own  
26 account.

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1           4. At the time of brokering the Notes, Havenor was not a registered representative with any  
2 licensed broker-dealer. Havenor has also not applied for, or received a certificate from, the  
3 Commissioner to engage in business as a broker-dealer.

4           Based upon the foregoing findings, the California Commissioner of Business Oversight is of  
5 the opinion that Fei Mu Havenor has effected transactions in securities as a broker-dealer without  
6 having first applied for and secured from the Commissioner a certificate, authorizing her to act in that  
7 capacity, in violation of section 25210 of the CSL. Pursuant to Section 25532 of the CSL, Fei Mu  
8 Havenor is hereby ordered to desist and refrain from effecting any transaction in, or inducing or  
9 attempting to induce the purchase or sale of, any security, in this state, unless and until she has  
10 applied for and secured from the Commissioner a certificate, then in effect, authorizing her to act in  
11 that capacity, unless exempted under the provisions of Chapter 1 (commencing with Section 25200)  
12 of this part.

13           This Order is necessary, in the public interest, for the protection of investors and consistent  
14 with the purposes, policies, and provisions of the Corporate Securities Law of 1968.

15 Dated: January 7, 2016  
16 Sacramento, California

JAN LYNN OWEN  
Commissioner of Business Oversight

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18  
19 By \_\_\_\_\_  
20 MARY ANN SMITH  
21 Deputy Commissioner  
22 Enforcement Division  
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