



1 (1) Violating California Financial Code § 23035 (c)-(e) by failing to enter into written  
2 agreements with deferred deposit customers; failing to provide written notices to customers as  
3 required under this section; failing to conspicuously post notices in view of the public with letters at  
4 least one-half inch in height; and using agreements that that are not in compliance with the  
5 provisions of this section.

6 (2) Violating California Financial Code § 23027 (b) by posting advertisements that do  
7 not contain the statutorily required disclosures under California Financial Code § 23027 (b).

8 (3) Violating California Code of Regulations, title 10, § 2025 (b) by failing to provide  
9 quarterly balance sheets demonstrating that Instant Cash maintains a minimum net worth under  
10 California Financial Code § 23007.

11 (4) Violating California Code of Regulations, title 10, § 2025 (c)(1) by failing to  
12 maintain evidence of checks for all loan files.

13 (5) Violating California Financial Code § 23037 (f) by engaging in any unfair, unlawful,  
14 or deceptive conduct, or make any statement that is likely to mislead in connection with the business  
15 of deferred deposit transactions, including using a written agreement that requires the customer to  
16 agree to terms and conditions in the agreement that are not disclosed to the customer.

17 (6) Violating any order issued by the Commissioner against defendants or any of them,  
18 including, but not limited to, the Desist and Refrain Order described in this complaint.

19 (7) Destroying, mutilating, concealing, altering, transferring or otherwise disposing of, in  
20 any manner, any books, records, documents, correspondence, brochures, manuals, or other  
21 documents of any kind relating to the deferred deposit business in the possession, custody or control  
22 of any of the defendants until further order of this Court.

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24 Dated: \_\_\_\_\_

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**JUDGE OF THE SUPERIOR COURT**

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