

1 VIRGINIA JO DUNLAP (CA BAR NO. 142221)  
Acting Assistant Commissioner  
2 ALAN S. WEINGER (CA BAR NO. 86717)  
Supervising Counsel  
3 JUDY L. HARTLEY (CA BAR NO. 110628)  
Senior Corporations Counsel  
4 Department of Corporations  
320 West 4<sup>th</sup> Street, Suite 750  
5 Los Angeles, California 90013-2344  
Telephone: (213) 576-7604  
6 Facsimile: (213) 576-7181

7 Attorneys for Defendant

8  
9 IN THE UNITED STATES DISTRICT COURT  
10 FOR THE EASTERN DISTRICT OF CALIFORNIA

11 WELLS FARGO BANK, N.A., and WELLS )  
12 FARGO HOME MORTGAGE, INC., )

13 Plaintiffs, )

14 vs. )

15 DEMETRIOS A. BOUTRIS, in his official )  
16 capacity as Commissioner of the California )  
17 Department of Corporations, )

18 Defendant. )  
19 )  
20 )

Civil Action No. S-03-0157 GEB JFM

) DECLARATION OF LOUISA BROUDY IN  
) SUPPORT OF DEFENDANT'S OPPOSITION  
) TO PLAINTIFFS' MOTION FOR  
) PRELIMINARY INJUNCTION

) Hearing Date: March 10, 2003  
) Time: 9:00 a.m.  
) Location: Courtroom 10

) **Hearing Requested**  
)  
)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

I, LOUISA BROUDY, declare as follows:

1. I make the following statements based on personal knowledge. If called as a witness, I could and would competently testify as follows.

2. I am employed by the State of California as the Assistant Commissioner of the Financial Services Division of the California Department of Corporations. I have held this position since August 1993. I make this declaration in my official capacity as Assistant Commissioner, and not otherwise.

3. On or about February 6, 2003, I received, via UPS Next Day Air Saver, unsolicited advertising from Wells Fargo Home Mortgage, Inc. ("WFHMI") for a special home refinance offer. In this advertising, dated February 5, 2003, WFHMI states that it "is licensed by the Department of Corporations under the California Residential Mortgage Lending Act".

4. True and correct copies of the documents I received from WFHMI (with address redacted) are attached as Exhibit 1 and incorporated by reference.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed at Los Angeles, California this 21st day of February 2003.

\_\_\_\_\_  
LOUISA BROUDY  
Declarant