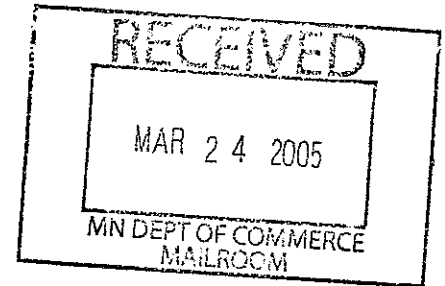


RE2406221/CLC

STATE OF MINNESOTA  
COMMISSIONER OF COMMERCE



CONSENT ORDER

In the Matter of the Real Estate  
License of Douglas R. Brown  
License No. 20368333; and  
Sure Foundation Real Estate, LLC,  
License No. 20368332.

TO: Douglas R. Brown  
1196 3<sup>rd</sup> Ave.  
Anoka, MN 55303

Commissioner of Commerce Glenn Wilson (hereinafter "Commissioner") has determined as follows:

1. The Commissioner has advised Douglas R. Brown (hereinafter "Respondent") that he is prepared to commence formal action pursuant to Minn. Stats. §§ 45.027 and 82.27 (2004), against Respondent's real estate broker license and the corporate real estate license of Sure Foundation Real Estate, LLC based on allegations that Respondent, while acting under the authorities of his real estate and building contractor licenses entered into a transaction with Paul and Marty Stariha and has engaged in acts or practices which demonstrate that he is untrustworthy, financially irresponsible or otherwise incompetent or unqualified to act under the authorities of the licenses granted by the commissioner in violation of Minn. Stat. § 45.027, Subd. 7 (4) (2004).
2. Respondent acknowledges that he has been advised of his rights to a hearing in this matter, to present argument to the Commissioner and to appeal from any adverse determination after a hearing, and Respondent hereby expressly waives those rights. Respondent

further acknowledges that he has been represented by legal counsel throughout these proceedings, or has been advised of his right to be represented by legal counsel, which right he hereby waives.

3. Respondent has agreed to informal disposition of this matter without a hearing as provided under Minn. Stat. § 14.59 (2004) and Minn. R. 1400.5900 (2003).

4. The following Order is in the public interest.

**NOW, THEREFORE, IT IS HEREBY ORDERED**, that the real estate broker license of Douglas R. Brown is **SUSPENDED** from the date of the signing of this order until June 30, 2006.

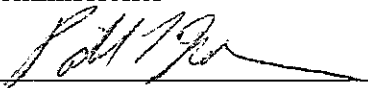
**IT IS FURTHER ORDERED**, that the real estate corporate license of Sure Foundation Real Estate, LLC is **SUSPENDED** from the date of the signing of this order until June 30, 2006.

This Order shall be effective upon signature by or on behalf of the Commissioner.

Dated: 4/1/05.

GLENN WILSON  
Commissioner

By:

  
PATRICK L. NELSON  
Deputy Commissioner  
Market Assurance Division

85 Seventh Place East, Suite 500  
Saint Paul, Minnesota 55101  
Phone: (651)296-2594

## CONSENT TO ENTRY OF ORDER

The undersigned, acting individually and on behalf of Sure Foundation Real Estate, LLC, states that he has read the foregoing Consent Order; that he knows and fully understands its contents and effect; that he is authorized to execute this Consent to Entry of Order on behalf of Sure Foundation Real Estate, LLC; that he has been advised of his right to a hearing; that he has been represented by legal counsel in this matter; or that he has been advised of his right to be represented by legal counsel and that he has waived this right; and that he consents to entry of this Order by the Commissioner of Commerce. It is further expressly understood that this Order constitutes the entire settlement agreement between the parties hereto, there being no other promises or agreements, either express or implied.

**SURE FOUNDATION REAL ESTATE, LLC**

By:

  
Douglas R. Brown

Its: \_\_\_\_\_

STATE OF Minnesota

COUNTY OF Anoka

This instrument was acknowledged before me on 3/14/05 (date) by Douglas Brown  
(name(s) of person(s)) as Officer (type of authority, e.g., officer, trustee, etc.) of  
Sure Foundation Real Estate, LLC (name of party on behalf of whom the instrument was executed).

(stamp)



  
(Signature of notary officer)

Parsonal Banker  
Title (and Rank)

My commission expires: Jan. 31, 2009