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Man		
	Department of Real Estate 320 West 4th Street, Ste. 350 Los Angeles California 90013-1105 DEPARTMENT OF REAL ESTATE	
2	Los Angeles, California 90013-1105	
3	Telephone: (213) 576-6911 (direct) -or- (213) 576-6982 (office)	
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. 8	BEFORE THE DEPARTMENT OF REAL ESTATE	
9	STATE OF CALIFORNIA	
	* * *	
10	) TO: No. H-34010 LA	
. 11	) STONEWOOD CONSULTING INC.; and ) ORDER TO DESIST	
12	HENDRIX MORENO MONTECASTRO, ) individually and as designated ) AND REFRAIN	
13	officer of Stonewood Consulting	
14	Inc.	
. 15	)	
16		
17	The Real Estate Commissioner of the State of California	
1.8	(Commissioner) has caused an investigation to be conducted of	ļ
19	your activities, as described herein, and based upon the findings	
20	of that investigation, is of the opinion that:	
21	YOU, STONEWOOD CONSULTING INC. and YOU, HENDRIX MORENO	
22	MONTECASTRO, individually and as designated officer of Stonewood	
23	Consulting Inc. have violated Sections 10145, 10176(a), 10176(b),	
24	10176(e), 10176(g), 10176(i), 10177(g) and 10241 of the	
25	California Business and Professional Code ("Code") and Sections	
26	2831, 2831.1, 2832, 2832.1, 2834, and 2835 of Title 10, Chapter	
27	6, California Code of Regulations.	
		I

AND THAT YOU, HENDRIX MORENO MONTECASTRO, individually and as designated officer of Stonewood Consulting Inc. have violated Code Section 10159.2.

AND FURTHERMORE THAT YOU, STONEWOOD CONSULTING INC., by operating a fraudulent investment scheme have violated Code Sections 10176(e) and 10176(i) by having commingled and converted trust funds of borrower-investor beneficiaries and engaged in fraud and dishonest dealing.

LICENSE HISTORY

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A. At all times mentioned, STONEWOOD CONSULTING INC.
 ("SCI") and HENDRIX MORENO MONTECASTRO ("MONTECASTRO") were
 licensed or had license rights issued by the Department of Real
 Estate ("Department") as real estate brokers.

15 в. At all times mentioned, SCI was licensed by the 16 Department as a corporate real estate broker by and through 17 MONTECASTRO, as the designated officer and broker responsible, 18 pursuant to Code Section 10159.2 for supervising the activities 19 requiring a real estate license conducted on behalf of SCI by 20 SCI's officers, agents and employees, including MONTECASTRO. SCI 21 was originally licensed on June 16, 2005, by MONTECASTRO.

C. MONTECASTRO was originally licensed as a real estate salesperson on May 3, 1993 and originally licensed as a real estate broker on November 20, 2003.

All further references to "you" include the parties identified in Paragraph 1 above, and also include the officers,

- 2 -

directors, employees, agents and real estate licensees employed by or associated with said parties and who at all times herein mentioned were engaged in the furtherance of the business or operations of said parties and who were acting within the course and scope of their authority and employment.

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LICENSED ACTIVITIES AND BROKERAGE

3.

At all times mentioned, in the City of Murrieta, County 9 of Riverside, you SCI and you MONTECASTRO acted as real estate 10 brokers conducting licensed activities within the meaning of:

A. Code Section 10131(a). You engaged in the business of, acted in the capacity of, advertised or assumed to act as real estate brokers, including the solicitation for listings of and the negotiation of the sale of real property as the agent of others.

Code Section 10131(b). You engaged in the business 16 В. 17 of, acted in the capacity of, advertised or assumed to act as 18 real estate brokers, including the operation and conduct of a 19 property management business with the public wherein, for or in 20 expectation of compensation, for another or others, you leased or 21 rented or offered to lease or rent, or placed for rent, or 22 solicited listings of places for rent, or solicited for 23 prospective tenants, or collected rents from real property, or 24 improvements thereon; and

C. Code Section 10131(d). You engaged in
 activities with the public wherein lenders and borrowers were
 solicited for loans secured directly or collaterally by liens on

- 3 -

real property, wherein such loans were arranged, negotiated, processed and consummated on behalf of others for compensation or in expectation of compensation and for fees collected in advance.

MORTGAGE LOAN AUDIT

4.

On May 22, 2007, the Department completed an audit 6 examination of the books and records of SCI pertaining to the 7 8 mortgage and loan brokerage activities described in Paragraph 3, ં 9 that require a real estate license. The audit examination covered a period of time beginning on December 1, 2004 to 10 January 31, 2007. The audit examination revealed violations of 11 12 the Code and the Regulations as set forth in the following paragraphs, and more fully discussed in Audit Report SD 060038 .13 14 and the exhibits and workpapers attached to said audit report. 15

## TRUST ACCOUNT

# MORTGAGE AND LOAN ACTIVITIES

5.

At all times mentioned, in connection with the 18 19 activities described in Paragraph 3, above, SCI accepted or received funds including funds in trust (hereinafter "trust 20 funds") from or on behalf of actual or prospective parties to 21 22 transactions handled by SCI including borrowers and lenders and 23 thereafter made deposits and or disbursements of such funds. 24 During the audit period SCI did not maintain a trust account for 25 the mortgage loan activities.

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## VIOLATIONS CITED BY THE

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#### MORTGAGE LOAN AUDIT

6.

In the course of activities described in Paragraphs 3
and 5, above, and during the examination period described in
Paragraph 4, you SCI and you MONTECASTRO acted in violation of
the Code and the Regulations in that you:

8 (a) Failed to provide, maintain or retain a true and 9 correct copy of a Department of Real Estate approved Mortgage 10 Loan Disclosure Statement signed by the broker for borrowers 11 DeGuzman (Jameson property), Cabrales (Agean property), Giron 12 (Wrangler property), Lanuzo (Wgasa property) and Lanuzo (Wildwood 13 property), in violation of Code Section 10241. Additionally, no 14 Truth-In-Lending Disclosure Statement was provided in the loan 15 file for borrower Reiss (Falkirk property). The Mortgage Loan 16 Disclosure Statement contained missing signatures and inaccurate 17 information about current liens and anticipated liens.

(b) Failed to disclose loan origination fees and yield
 spread premiums from lenders on the Mortgage Loan Disclosure
 Statement for the aforesaid borrowers, in violation of Code
 Sections 10176(g) and 10241; and

(c) Failed to maintain a record for trust funds handled
by SCI related to mortgage loan activities, in violation of Code
Section 10145 of the Code and Regulation 2832.

RESIDENTIAL RESALES AUDIT

7.

On May 22, 2007, the Department completed an audit

examination of the books and records of SCI pertaining to the 1 2 residential resales activities described in Paragraph 3, that 3 require a real estate license. The audit examination covered a 4 period of time beginning on December 1, 2004 to January 31, 2007. The audit examination revealed violations of the Code and the 5 б Regulations as set forth in the following paragraphs, and more 7 fully discussed in Audit Report SD 060029 and the exhibits and workpapers attached to said audit report. 8 9 8. 10 TRUST ACCOUNT 11 RESIDENTIAL RESALES AUDIT At all times mentioned, in connection with the 12 13 activities described in Paragraph 3, above, SCI accepted or received funds including funds in trust (hereinafter "trust 14 funds") from or on behalf of actual or prospective parties to 15 16 transactions handled by SCI including buyers and sellers and 17 thereafter made deposits and or disbursements of such funds. During the audit period SCI did not maintain a trust account for 18 19 the residential resale activity. 20 VIOLATIONS CITED BY THE 21 RESIDENTIAL SALES AUDIT 22 9. 23 In the course of activities described in Paragraphs 3 24 and 8, above, and during the examination period described in 25 Paragraph 7, you SCI and MONTECASTRO acted in violation of the

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(a) Engaged in a price inflation scheme.

Code and the Regulations in that you:

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(1) SCI and MONTECASTRO used inflated appraisals to 1 2 purchase real properties substantially in excess of the asking price; typically fifteen to twenty percent above it. 3

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(2) In addition to receiving a commission of the sale 5 and purchase of the property, SCI and MONTECASTRO received as 6 additional compensation in the form of a "concession".

7 (3) The concession is defined as the difference 8 between contract sales price based on the inflated property 9 appraisals and the seller net price. The concession is also 10 approximately equal to the difference between the asking and the 11 ultimate sales price.

12 (4) Concessions ranging from \$74,000 to \$115,000 were 13 obtained from buyers DeGuzman, Canett and Reiss, Cabrales and 14 Lanuzo, for a total of ten properties totaling \$969,158, in 15 violation of Code Sections 10176(i) and 10177(g).

16 (b) Misrepresented to sellers that you held earnest 17 money deposits at the time the offer to purchase was made for buyers DeGuzman (Honeysuckle property), Canett (Cherrybranch 18 19 property) and Reiss (Cloverleaf property). These representations 20 were false. No earnest money deposits were held for the sellers, in violation of Code Sections 10176(a) and/or 10177(g). 21

22 (c) Failed to maintain a control record in the form of 23 a columnar record in chronological order of all "Trust Funds 24 Received, Not Placed Broker's Trust Account", in violation of 25 Code Section 10145 and Regulations 2831.

26 (d) Failed to maintain a separate record for each 27 beneficiary or transaction, thereby failing to account for all

1 trust funds received, as required by Code Section 10145 and 2 Regulation 2831.1.

(e) Failed to perform a monthly reconciliation of the
balance of all separate beneficiary or transaction records
maintained pursuant to Regulation 2831.1 with the record of all
trust funds received and disbursed the property management trust
account, as required by Code Section 10145 and Regulation 2831.2;
and

9 (f) Failed to place trust funds, including a \$500 10 appraisal fee to be paid to Advance Real Estate Appraisal on 11 behalf of borrower DeGuzman's (Jameson property), accepted on 12 behalf of another into the hands of the owner of the funds, a neutral depository or into a trust fund account in the name of 13 14 the trustee at a bank or other financial institution not later than three business days following receipt of the funds by the 15 . 16 broker or by the broker's salesperson, as required by Code Section 10145 and Regulation 2832(d). 17

#### PROPERTY MANAGEMENT AUDIT

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#### 10.

20 On May 22, 2007, the Department completed an audit examination of the books and records of SCI pertaining to the 21 22 broker-controlled escrow activities described in Paragraph 3, 23 that require a real estate license. The audit examination covered a period of time beginning on June 1, 2006 to January 31, 24 The audit examination revealed violations of the Code and 25 2007. 26 the Regulations as set forth in the following paragraphs, and 27 more fully discussed in Audit Report SD 060037 and the exhibits

- 8 -

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1	and workpapers attached to said audit report.
. 2	TRUST ACCOUNT
3	PROPERTY MANAGEMENT AUDIT
4	11.
5	At all times mentioned, in connection with the
6	activities described in Paragraph 3, above, SCI accepted or
7	received funds including funds in trust (hereinafter "trust
8	funds") from or on behalf of actual or prospective parties to
. 9	transactions handled by SCI including property owners and
10	tenants. Thereafter SCI made deposits and or disbursements of
11	such funds. SCI maintained the following trust account into
. 12	which it deposited certain of these funds:
. 13	Hendrix Moreno Montecastro Stonewood Consulting Inc.
14	Real Estate Broker Trust Account No. 2141840767"
15	Bank of America Wildomar, California (property management trust account)
16	
. 17	VIOLATIONS CITED BY
. 18	PROPERTY MANAGEMENT AUDIT
19	12.
20	In the course of activities described in Paragraphs 3
21	and 11, above, and during the examination period described in
22	Paragraph 10, you SCI and MONTECASTRO acted in violation of the
23	Code and the Regulations in that you:
24	(a) Permitted, allowed or caused the disbursement of
25	trust funds from the escrow trust account where the disbursement
26	of funds reduced the total of aggregate funds in the property
27	management trust account, to an amount which, on December 31,

- 9 -

2006, was \$5,516.23 less than the existing aggregate trust fund
liability of SCI to every principal who was an owner of said
funds, without first obtaining the prior written consent of the
owners of said funds, as required by Code Section 10145 and
Regulation 2832.1. The shortage has not been restored.

(b) Failed to maintain an adequate control record in
the form of a columnar record in chronological order of trust
funds received for the property management trust account, as
required by Code Section 10145 and Regulation 2831.

(c) Failed to maintain a separate record for each
 beneficiary or transaction, thereby failing to account for all
 trust funds received, as required by Code Section 10145 and
 Regulation 2831.1.

(d) Failed to perform a monthly reconciliation of the
balance of all separate beneficiary or transaction records
maintained pursuant to Regulation 2831.1 with the record of all
trust funds received and disbursed the property management trust
account, as required by Code Section 10145 and Regulation 2831.2.

(e) The property management trust account was not in
the name of the broker as trustee at a bank or other financial
institution, nor designated as a trust account, in violation of
Code Section 10145 of the Code and Regulation 2832(a).

(f) Permitted employees JoEtta Zimmer and Bridgett
 Holbrook, unlicensed and unbonded persons, to be authorized
 signatories on the trust account, in violation of Code Section
 10145 and Regulation 2834.

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(g) Failed to disburse from the property management
 trust account broker's management fees totaling \$20,000 within
 twenty-five days of deposit, in violation of Code Section 10145
 and Regulation 2835.

STONEWOOD CONSULTING INC.

### FRAUDULENT INVESTMENT SCHEME

#### 13.

You, SCI, and you, MONTECASTRO, operated a fraudulent
 investment scheme soliciting investors to purchase multiple real
 properties. Investors were induced by your promise that that
 they would become millionaires in three years. Though variations
 exist, the essential features of the pyramid financing scheme
 involved:

(1) Between November 2004 and continuing to date, you sought
 out potential investors buyers with good credit seeking
 to purchase multiple real properties.

 (2) Your method of investor contact used word of mouth solicitation made by MONTECASTRO's mother and father, Helen and Bayani Delos Montecastro aka Bob Montecastro.
 "Bob" Montecastro is a real estate salesperson.

(3) Bob and Helen solicited investors through her nursing
employment affiliations. Both Helen and Bob solicited
members of their church both in California and Arizona.
(4) Public meetings, conducted by Helen, Bob and MONTECASTRO,
were held to solicit investors.

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- 1 (5)Once solicited by Helen or Bob, or through other family 2 members, MONTECASTRO closed the oral investment 3 arrangement with the investors by promising to make them 4 millionaires in three years. 5 (6) Investors were told by MONTECASTRO that unhesitating adherence to the rules of the investment protocol was 6 7 mandatory. They were advised to sign documents presented 8 to them by MONTECASTRO and Bob without questioning. 9 (7) Investors signed residential loan applications often 10 containing falsified or altered representations including,
- Verification of Employment and Verification of Deposits.
  (8) Fraudulent Verification of Deposit and Verification of Employment were prepared by or on behalf of SCI and MONTECASTRO. The altered Verification of Deposits and Verification of Employment were used to qualify an investor for mortgage loans above his/her true credit score.

 (9) MONTECASTRO selected the real properties for investment.
 (10) MONTECASTRO made offers on behalf of the investors. Although the properties were dormant slow-moving properties, offers made were substantially in excess of the listing price. Once accepted by the sellers, inflationary appraisals were used to justify a purchase money loan on the inflated price.

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(11) In addition to their realtor commission, SCI and MONTECASTRO received as compensation a "concession". A concession is defined as the difference between the

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higher inflationary contract price and the lower net seller price. Typically, the concession would range between from \$75,000 to \$115,000 per property. The concession parameters roughly equal the difference between the inflated sales price and the original sales price.

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(12) The commission and concession paid to SCI and MONTECASTRO were disclosed to all parties.

(13) The purchase of the real property complete, the initial round of the investment scheme was complete.

(14) In the second round of the multi-property investment purchase scheme, SCI and MONTECASTRO informed investors that they would use a portion of their concession to finance additional property purchases on behalf of the original buyers.

(15) To complete the new purchase financing, investors were directed to refinance their newly- purchased property.

(16) After refinancing, investors were directed to turn over the refinance proceeds to SCI and MONTECASTRO

(17) The refinance funds are trusts funds. Yet no accounting was ever rendered. Nor were they deposited into the broker trust account. However, they were mixed and commingled with the concession received by SCI and MONTECASTRO.

(18) To complete the purchase of this secondary and subsequent multiple financing rounds, the investors were directed to ///

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either maximize their credit card cash advances or open up new credit card accounts for this purpose.

(19) The new credit card application were provided unsolicited from Pacific Wealth and JoVanne companies. These corporations are not licensed by the Department. They are owned and/or controlled by MONTECASTRO and/or his family including his Aunt "Connie". Investors were told that obtaining more credit cards increased their credit profile. Connie and MONTECASTRO decided which investor to pay from the investor's own funds that were managed and retained by them.

 (20) Investors were also solicited to dip into their retirement savings accounts and pensions to finance additional rounds of inflated property purchases.
 (21) SCI and MONTECASTRO used the concessions, loan refinance

proceeds, cash advances, retirement savings and pensions to affect the purchase of multiple rounds of priceinflated properties. As each new property purchase was made, SCI and MONTECASTRO received another concession. (22) In this manner, investors were induced to purchases,

several properties, spiraling up their debt load.

(23) Additionally, SCI and MONTECASTRO would rent out the additional properties purchased. The shortfall between the rental income and the mortgage payment was paid by SCI and MONTECASTRO purportedly from the concession.

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(24) SCI, MONTECASTRO and Connie threatened to stop paying the shortfall unless the debt-laden investors continued to take out credit cards with concomitant cash advances and turn them over to them.

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(25) During November 2006 and January 2007, SCI and MONTECASTRO met with the disenchanted investors, some faced or were in foreclosure due to not receiving shortfall payments from SCI and MONTECASTRO. SCI and MONTECASTRO and informed them that the equity growth in the real estate market had ceased; that the bottom had fallen out of the real estate market.

(26) SCI and MONTECASTRO solicited the investors to invest by the same means as outlined for the purpose of MONTECASTRO investing the new influx of capital into Dinars, the Iraqi currency. And in doing so, SCI and MONTECASTRO promised again that the investors would be millionaires within three years.

(27) Being indebted often with several mortgages on multiple properties purchased at an inflated prices, the investors could not service their disproportionate mortgage debt as it fell due. Subsequently, the investors defaulted, faced foreclosure or were foreclosed upon, or had their credit adversely affected.

(28) SCI and MONTECASTRO engaged in a turnkey price-inflated
 multiple property scheme. They, through themselves or by
 members of their family, controlled all investor monies
 and trust funds without accounting. SCI and MONTECASTRO

- 15 -

threatened to stop making shortfall mortgage payments, and sought a never-ending succession of all funding sources available to the investors. Left without traditional financing safety nets, they suffered economic loss and pecuniary harm as to the following non-exclusive list of investors, including loss of their homes.

INVESTOR(S)

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### PROPERTY

10	Carrillo, Edwardo & Soledad	1171 Masterpiece Dr., Oceanside
11		23895 Via Aliso, Murrieta 38266 Shadow Creek, Murrieta
12		42392 Wildwood Ln., Murrieta 23661 William Pl., Murrieta
13	•	35153 El Diamante, Wildomar
14		29104 Bent Tree Dr., Murrieta 1100 Championship Rd.,
15	• .	Oceanside
16		23911 Ridgeview Ln., Murrieta
17	Lanuzo, Janet & Steve	40502 Wgasa Pl., Temecula 27134 Red Maple, Murrieta
18		23506 Karen Pl., Murrieta
19		25410 Chesterfield Ln.,
19	·	Wildomar
20		23732 Lincoln Ave., Murrieta 42272 Wildwood Ln., Murrieta
21		44753 Longfellow Ave.,
		Temecula
22		33265 Manchester, Temecula
23		32011 Calle Caballos, Temecula
24	Weber, Herman & Deborah	977 N. Ironwood Ave., Rialto
25	Reiss, Vicky	23876 Cloverleaf Wy., Murrieta
26	· · ·	42171 East View Wy., Murrieta,
		38537 Clearbrook Dr., Murrieta 29336 Gandolf Ct., Murrieta
27		38703 Falkirk Dr., Murrieta

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•	Giron, Gerry & Cynthia 27218 Red Maple, Murrieta 23532 Ashwood Ct., Murrieta
` 2	24250 Brillante Dr., Wildomar
3	29105 Wrangler, Murrieta 33386 Morning View, Temecula
. 4	35418 Veranda Cir., Wildomar
. 5	28599 Chaparral View Dr, Menifee
6	35139 El Diamante Dr.,
7	Wildomar 2003 Alberte Aug. Opportgide
	903 Alberta Ave., Oceanside 39111 Los Gatos Dr., Temecula
8	
9	Cabrales, Bernardo & Elsa 23692 Morning Glory, Murrieta 29335 Shady Ln., Murrieta
10	41468 Agean Ct., Murrieta
. 11	25482 Chesterfield, Wildomar 24259 Evening Shade Pl.,
. 12	Murrieta
13	29240 Wrangler Dr., Murrieta 27390 Hillcrest, Murrieta
14	
	Capacio, Arnulfo & Evelyn 27194 Red Maple, Murrieta
15	29198 Broken Arrow Wy.,
16	Murrieta 12807 Clallam Rd., Apple Valley
17	29083 Bent Tree Dr., Murrieta
18	33732 Springbrook, Temecula
. 19	14.
20	SCI and MONTECASTRO intentionally engaged in the
21	conduct above set forth. In the alternative, SCI and
22	MONTECASTRO engaged in negligence in transactions for which real
23	estate licenses are required.
24	15.
25	T.
26	Violations of the Real Estate Law
27	A. 10176(a) for misrepresenting to investors and trust
	- 17 -

1 fund beneficiaries that SCI and MONTECASTRO would make them
2 millionaires in three years.

B. 10176(b) for making false promises of a character
likely to influence, persuade or induce their investors and trust
fund owner-beneficiaries into believing that SCI and MONTECASTRO
would make up the difference between the incoming rental income
and the outgoing mortgage payment on the purchased properties.

C. 10176(e) for commingling investor trust funds with
 SCI's general funds by mixing buyer proceeds from investment
 capital, purchase loans, loan refinances, credit card cash
 advances, pensions and retirement funds with SCI and
 MONTECASTRO's commissions and concessions for purchasing
 properties.

D. 10176(i) for fraud and dishonest dealing in connection with an ongoing investment scheme manifested by purchasing inflated properties by means of multiple rounds of investor's capital and refinance financing.

E. 10176(i) for failing to account to investors how their re-invested trust funds were spent. SCI and MONTECASTRO concealed from the investors the true status of their respective investments. SCI and MONTECASTRO induced investors to believe that rental property shortfalls between rental income and mortgage payments would be paid by Respondents.

F. 10176(i) for conversion of investor trust funds. At no time did investor's funds leave the control and/or direction of SCI and MONTECASTRO as a means of perpetuating their ///

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fraudulent investment scheme but instead were continued turned
 over to SCI and MONTECASTRO by the investors.

G. 10176(i) for fraud in either preparing and/or
submitting falsified loan documentation including but not limited
to verifications of deposit and verifications of employment,
income amounts and sources.

7 Η. 10177(g) for negligence by promoting a speculative real estate investment scheme for which a real estate license is 8 required. SCI and MONTECASTRO investment methodology required . 9 the investor to continue to assume an ever spiraling assumption 10 of debt on inflated price sales of property to investors. 11 12 Therefore an ever-increasing new influx of financing from new or ongoing investors was necessary to maintain the scheme. 13 This is 14 Ponzi-style financing and is manifesting fraudulent.

15 NOW, THEREFORE, YOU, STONEWOOD CONSULTING INC., and 16 YOU, HENDRIX MORENO MONTECASTRO, ARE ORDERED TO DESIST AND REFRAIN from performing any and all acts requiring a real estate 17 18 license in California unless and until you are in compliance with Sections 10145, 10176(a), 10176(b), 10176(e), 10176(g), 10176(i), 19 20 10177(g) and 10241 of the California Business and Professional Code and Sections 2831, 2831.1, 2832, 2832.1, 2834, and 2835 of 21 22 Title 10, Chapter 6, California Code of Regulations.

AND, YOU, HENDRIX MORENO MONTECASTRO, individually and
 as designated officer of Stonewood Consulting Inc., ARE ORDERED
 TO DESIST AND REFRAIN from performing any and all acts requiring
 a real estate license in California unless and until you are in
 compliance with Section 10159.2.

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1	AND, THAT YOU, STONEWOOD CONSULTING INC. and YOU,		
2	HENDRIX MORENO MONTECASTRO, ARE ORDERED TO DESIST AND REFRAIN		
3	from accepting or receiving, depositing, disbursing, commingling		
4	or converting trust funds of investor-borrowers to any person or		
5	entity, without the prior written consent of the owners of the		
. 6	trust funds and in compliance with the Real Estate Law.		
7	AND FURTHERMORE, THAT YOU, STONEWOOD CONSULTING INC.		
B	and YOU, HENDRIX MORENO MONTECASTRO, ARE ORDERED TO DESIST AND		
. و	REFRAIN from engaging in an investment scheme or plan involving		
10	the turnkey operation of pyramid debt and equity financing of		
11	multiple real properties from real estate investors and		
12	borrowers.		
13	DATED <u>May 29</u> , 2007.		
14	JEFF DAVI		
15	Real Estate Commissioner		
16	Auton		
17	DE WAVATES DELL		
10	By WAYNE S. BELL Chief Counsel		
19			
20			
21			
22			
23			
24			
25	cc: Stonewood Consulting Inc.		
26	c/o Hendrix Moreno Montecastro D.O. 26273 Horsetail St.		
. 27	Murrieta, CA 92562		
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	L L V - '		