

LAWRENCE G. WASDEN
Attorney General

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**BEFORE THE DIRECTOR OF THE DEPARTMENT OF FINANCE
OF THE STATE OF IDAHO**

STATE OF IDAHO, DEPARTMENT OF
FINANCE, SECURITIES BUREAU,

Complainant,

vs.

ALL NET ESCROW,

Respondent.

Docket No. 2012-7-07

**ORDER TO CEASE AND DESIST AND
NOTICE OF THE OPPORTUNITY FOR A
HEARING**

Gavin M. Gee, Director of the Idaho Department of Finance (Director), being authorized and directed to administer and enforce the Idaho Escrow Act, Idaho Code § 30-901 *et seq.* (the Escrow Act) and the Idaho Financial Fraud Prevention Act, Idaho Code § 67-2750 *et seq.* (the IFFPA), hereby alleges the following facts that constitute a basis for the issuance of an ORDER TO CEASE AND DESIST (Order) pursuant to Idaho Code §§ 26-3106(2) and 67-2755(1), requiring Respondent ALL NET ESCROW to cease and desist from violating the two acts.

The Director finds that there is an immediate threat to the public welfare which requires immediate agency action, as detailed below. Accordingly, this Order takes effect immediately upon issuance.

RESPONDENT AND RELATED PARTIES

1. All Net Escrow (All Net) purports to be a licensed escrow business domiciled in Idaho, with a principal business address of 1205 Iron Eagle Drive, Eagle, Idaho. It also purports to hold Idaho based telephone numbers (208) 473-7203 and (208) 473-2604, the latter number purporting to be a fax number. All Net is not now and never has been licensed in any capacity by the Idaho Department of Finance. All Net documents identify Jeffrey Ross as the General Manager. Potential customers J.M. and S.M. (the Ms) have received mail on behalf of All Net from Amanda Campbell.

2. Castle Wealth Management (Castle) of Oklahoma City, Oklahoma¹, purports to be the world's largest resort timeshare resale company, and purports to use All Net for escrow transactions relating to the purchase and sale of time share properties. Keith Hayes is identified by Castle as both its Director and as its Marketing Director. "Exclusive Resale Contracts" provided by Castle to potential sellers identify Anthony Braddock and Steven Moore as "Agents" for purposes of signing the Exclusive Resale Contracts.

FINDINGS OF FACT

3. On or about June 18, 2012, a local title company inquired about All Net's status and contacted Idaho Department of Finance (Department) employees. Over the next two days, a Department investigator tried to contact All Net by telephone and email (escrow@allnetescrow.com), but was unsuccessful.

4. A Department investigator initiated an investigation into All Net, and as part of that effort, on June 20, 2012, went to the physical address that All Net listed on its website (www.allnetescrow.com). The investigator noted that no signage reflected All Net's presence in

¹ There is no known relationship between Castle Wealth Management of Oklahoma City, Oklahoma and Castle Wealth Management of West Palm Beach, Florida, the latter being a legitimate financial services business.

the building. Upon inquiring of other occupants of the address, the investigator learned that All Net had never been a tenant of the building.

5. All Net listed two Idaho phone numbers (see paragraph 1 above). The Department's investigator was unable to track them to any actual legitimate person or business, but did find that one of them was formerly linked to a now-defunct business.

6. On June 21, 2012 J.M. and S.M. contacted the Department, inquiring about All Net's status. J.M. emailed the Department asking for information, and forwarded an attachment from All Net. All Net had emailed the Ms and had attached a copy of what All Net said was its Idaho license to conduct escrow activities. See Attachment A to this Order for a copy of the attached license.

7. It was apparent to Department employees that the purported license was bogus. A Department employee replied to the Ms, stating "The company referenced on the license you received, All Net Escrow, is not licensed by the Department in any manner. In fact, the copy of the license provided to you does not match any form of license currently issued by the Department."

8. As the investigation unfolded, the All Net website shut down and is no longer available. See Attachment B to this Order for screen prints taken of All Net's website before it disappeared.

9. The Department's investigator found nothing linking All Net to the Eagle, Idaho address, other than All Net's website and the sham license.

10. Further investigation revealed that All Net is associated with Castle. Potential customers, D.R., D.C. and C.C., the Ms, and others, stated that they were cold-called by a person purporting to represent Castle who made reference to a timeshare each customer had purchased

in Mexico. The caller asked whether the customers would be interested in selling that timeshare. When the customer replied "yes," the caller passed them off to another person for more discussion.

11. The second caller also purported to represent Castle, and stated that Castle had purchasers interested in buying timeshare interests such as the one owned by the potential customer. Part of the pitch was that the purchase money would be placed into escrow and released once the customer signed the appropriate documents. The caller told the customers that they would be contacted by someone from All Net.

12. The customers were soon contacted by All Net, and were given a description of how the money transfer was to work. All Net emailed the customers a set of documents related to the transaction, including a Customer Satisfaction Guarantee, a Transfer Process, a Transfer of Ownership Agreement, a letter congratulating the customer on the sale of the property and listing the amount the customer could expect to receive, and Wire Transfer Information. See Attachment C to this Order for a copy of the documents.

13. The Wire Transfer Information was for the customer to wire the transfer or escrow fee to the Banco Mercantil del Norte, S.A., at Blvd. Hilario Medina #2503, Col. Real Prov., Leon, GTO Mexico C.P.37250, account number XXX XXX 7342.

14. The plan was, once the customers wired the transfer fee, All Net would complete the transaction and forward sales proceeds to the customer. In the case of customers J.M. and S.M., the transfer fee was to be \$15,490. In the case of customers D.C. and C.C., the transfer fee was to be \$15,875.

15. The Department issued a press release on June 22, 2012, that announced a public investigation of All Net. See Attachment D to this Order for a copy of the press release. As a

result of this press release, ten potential customers of All Net contacted the Department. While the customers were in various stages of the “sale” of their timeshare interests, all related similar descriptions of the “sale” process and the involvement of All Net and Castle.

16. The most recent caller stated that Jeff Ross with All Net told him that All Net was being purchased by a company named Perfect Title.

17. The Director finds that the public welfare is in immediate danger from the unlicensed activities of All Net, as set forth above.

CONCLUSIONS OF LAW

ESCROW ACT VIOLATIONS

18. Idaho Code § 30-903 provides: “(1) It shall be unlawful for any person to directly or indirectly engage in or carry on, or purport to engage in or carry on, the business of, or act in the capacity of, an escrow agency in or from Idaho without first obtaining a license under this chapter.”

19. By using an Idaho address and telephone numbers, All Net purported to engage in or carry on the business of an escrow agency in or from Idaho.

20. All Net did not obtain a license to engage in or carry on the business of an escrow agency, and therefore violated the Idaho Escrow Act, specifically Idaho Code § 30-903.

FINANCIAL FRAUD PREVENTION ACT VIOLATIONS

21. Idaho Code § 67-2752 provides: “It is unlawful for any person, directly or indirectly: ... (3) To falsely represent that a person is a financial institution or a representative of a financial institution, for the purpose of obtaining money, goods or services from any person.”

22. Idaho Code § 67-2751(4) defines “financial institution” to include an escrow agency.

23. By falsely representing that it was an escrow agency in Idaho, agents of All Net violated the Financial Fraud Prevention Act, specifically, Idaho Code § 67-2752.

ORDER

The Director, having reviewed the foregoing, and good cause being shown therefore,

THE DIRECTOR HEREBY FINDS That All Net has violated the Idaho Escrow Act, Idaho Code § 30-901 *et seq.* and the Idaho Financial Fraud Prevention Act, Idaho Code § 67-2750 *et seq.*

NOW, THEREFORE, IT IS HEREBY ORDERED That All Net shall CEASE AND DESIST from purporting to be an Idaho escrow agency until such time as All Net is licensed in Idaho as an escrow agency.

IT IS FURTHER ORDERED That All Net shall CEASE AND DESIST from falsely representing that it is an escrow agency in Idaho.

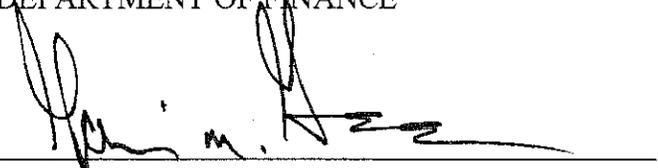
This ORDER TO CEASE AND DESIST is effective immediately.

IT IS SO ORDERED.

DATED this 2ND day of July, 2012.



STATE OF IDAHO
DEPARTMENT OF FINANCE



GAVIN M. GEE, Director

NOTICE

ALL NET IS HEREBY NOTIFIED that the foregoing Order to Cease and Desist will become a final order of the Director on the date it becomes effective, subject to All Net's right to file a motion for reconsideration or request for a hearing. Pursuant to Idaho Code § 67-5246, All Net may file a motion for reconsideration of this Order to Cease and Desist or a request for hearing within fourteen (14) days of the issuance of this Order. Any hearing and subsequent proceedings in this matter will be conducted in accordance with the Idaho Administrative Procedure Act, Idaho Code § 67-5201, *et seq.*

If All Net files a timely request for hearing, the Department will notify All Net of the date, time and place of the hearing, as well as the name of the presiding officer. At the hearing, All Net will be entitled to enter an appearance, introduce evidence, examine and cross-examine witnesses, make arguments, and generally participate in the conduct of the proceedings. All Net may also be represented by legal counsel at Respondents' own expense.

Any motion for reconsideration shall be served upon the Director by serving a copy on the following:

Marilyn Chastain
Securities Bureau Chief
Idaho Department of Finance
800 Park Boulevard, Suite 200
P.O. Box 83720
Boise, ID 83720-0031

A copy of such motion for reconsideration shall also be served upon the Department's counsel, Alan Conilogue, Deputy Attorney General, at the same address.

CERTIFICATE OF SERVICE

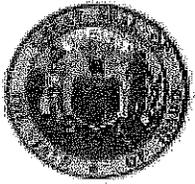
I HEREBY CERTIFY that on this 2 day of July, 2012, I served a true and correct copy of the foregoing CEASE AND DESIST ORDER AND NOTICE OF THE OPPORTUNITY FOR A HEARING upon the following by the designated means:

ALL NET ESCROW
1205 Iron Eagle Drive
Eagle, Idaho 83616

- U.S. mail, postage prepaid
- Certified mail
- Facsimile: (208) 473-2604
- Email: escrow@allnetescrow.com



Paralegal



IDAHO
DEPARTMENT OF FINANCE

This is to Certify That

ALL NET ESCROW

Is hereby authorized and empowered to engage in regulated escrow and title activities for which a license is required pursuant to Idaho code §28-46-402 at

1205 IRON EAGLE DR, EAGLE, ID 83616

And continuing in full force until or unless earlier surrendered, revoked, or suspended.

RECEIVED

SEP 26 2011

Licensing Dept.

Original Issue Date: 6/12/2001

Modification Date: 9/24/2011

Renew on or before: 10/20/2012

This license is published on this

24th of September, 2011.

Gavin M. Gao
Director, Idaho Department of Finance



ATTACHMENT A

Home

Privacy

About Us

Services

Contact Us

ALL NET ESCROW



Welcome, We Are All Net Escrow



A successful escrow company provides attention to detail, security, professionalism, and fast service. Our goal at All Net Escrow is to expedite the sale process while providing both buyers and sellers with rock-solid security.

All Net Escrow was initially formed in order to meet the growing need for a reliable online escrow service. It was evident that many of the existing companies out there could not meet the needs of clients in this day and age. Through the use of cutting edge technologies, proprietary streamlining, and stringent hiring practices we have achieved a system in which customer satisfaction is maintained throughout the sale and closing process.

[Read more »](#)

Account Login

Account #:

Password:

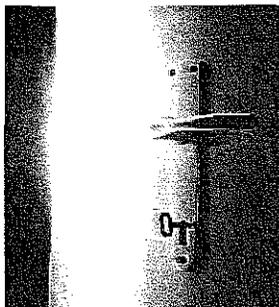
[Forgot Password](#) [Login »](#)

Testimonials

"Assuring smooth escrow closings requires an experienced and knowledgeable escrow officer with excellent problem solving skills. No one is better than All Net Escrow."

- Linda Lee

What We Can Do For You



By bringing together the very best in the industry, a solid partnership was formed. Today, this partnership remains the living, breathing core of All Net Escrow. The effectiveness of our business model is proven time and again by the efficient and thorough manner in which we handle all of our client's needs.

All Net Escrow focuses on cultivating a positive relationship with our customers. We believe that our long-term success depends on our ability to act as an effective intermediary between buyer and seller while maintaining the integrity for both.

"All Net Escrow sets the bar very high with their responsiveness, professionalism, customer service, and follow up/follow through. They are a very competent and capable organization, and do a great job with the services they provide."

- John White

ATTACHMENT B

[Read more »](#)



Our Mission

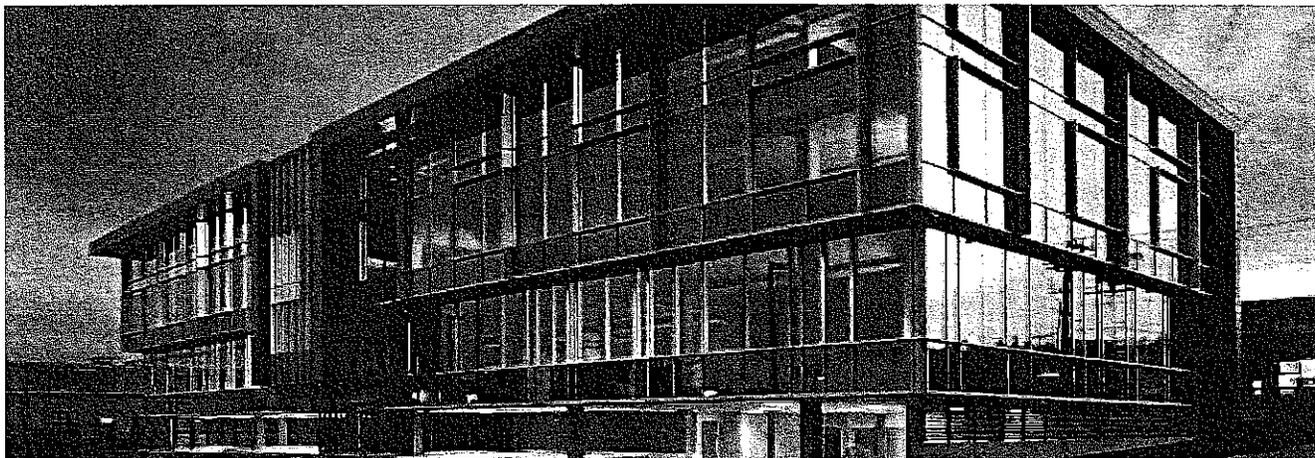
To provide efficient escrow services, competitive and functional, based on a philosophy of service, innovation, a strong code of ethics and technology, as well as the integration of the expertise and experience we have acquired over the years. The human factor, however, remains our most definitive and strongest quality as well as our commitment to maintain the highest standards of professionalism.

Contact Info

All Net Escrow
allnetescrow.com
escrow@allnetescrow.com
1205 Iron Eagle Dr, Eagle
Eagle, Idaho 83616
Toll Free: (877) 589 9869
Direct Line: (208) 209-3272
FAX Line: (208) 485-3774

Copyright 2001 All Net Escrow All Rights Reserved

ALL NET ESCROW



About All Net Escrow

For information regarding existing All Net Escrow accounts or to initiate a new closing, please call Toll Free (877) 589 9869.

A successful escrow company provides attention to detail, security, professionalism, and fast service. Our goal at All Net Escrow is to expedite the sale process while providing both buyers and sellers with rock-solid security.

All Net Escrow was initially formed in order to meet the growing need for a reliable online escrow service. It was evident that many of the existing companies out there could not meet the needs of clients in this day and age. Through the use of cutting edge technologies, proprietary streamlining, and stringent hiring practices we have achieved a system in which customer satisfaction is maintained throughout the sale and closing process.

By bringing together the very best in the industry, a solid partnership was formed. Today, this partnership remains the living, breathing core of All Net Escrow. The effectiveness of our business model is proven time and again by the efficient and thorough manner in which we handle all of our client's needs.

All Net Escrow focuses on cultivating a positive relationship with our customers. We believe that our long-term success depends on our ability to act as an effective intermediary between buyer and seller while maintaining the integrity for both.

Our Mission

To provide efficient escrow services, competitive and functional, based on a philosophy of service, innovation, a strong code of ethics and technology, as well as the integration of the expertise and experience we have acquired over the years. The human factor, however, remains our most definitive and strongest quality as well as our commitment to maintain the highest standards of professionalism.

Our Vision

Account Login

Account #:

Password:

Forgot Password [Login »](#)

Testimonials

License

All Net Escrow 675832-3C
Nafsa Registration
ITN-36-2011

To be the best option in escrow services, we are a leader in the industry, since 2001, we have held customer service, security, integrity and our code of ethics to the highest standard possible.

We are able to complete transactions large and small. This helps with cash flow, use of valuable time and enables you to have certainty knowing you have a trusted 3rd party administering your transaction, leaving you to develop further business interests.

© Copyright 2001 All Net Escrow All Rights Reserved

When you need a neutral third party, look to All Net Escrow and the services we provide for you. With the expertise and resources required to deliver in a market filled with uncertainties, closing agreements are an easily acceptable and versatile tool for assuring the safe, fair and efficient completion of your transaction.



Our Mission

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Toll Free: (877) 589 9869
Direct Line: (208) 209-3272
FAX Line: (208) 485-3774

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ALL NET ESCROW



Privacy Policy

All Net Escrow is committed to protecting your privacy and developing technology that gives you the most powerful and safe online experience. This Statement of Privacy applies to the All Net Escrow Web site and governs data collection and usage. By using the All Net Escrow website, you consent to the data practices described in this statement.

Collection of your Personal Information

All Net Escrow collects personally identifiable information, such as your e-mail address, name, home or work address or telephone number. All Net Escrow also collects anonymous demographic information, which is not unique to you, such as your ZIP code, age, gender, preferences, interests and favorites.

There is also information about your computer hardware and software that is automatically collected by All Net Escrow. This information can include: your IP address, browser type, domain names, access times and referring Web site addresses. This information is used by All Net Escrow for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the All Net Escrow Web site.

Please keep in mind that if you directly disclose personally identifiable information or personally sensitive data through All Net Escrow public message boards, this information may be collected and used by others. Note: All Net Escrow does not read any of your private online communications.

All Net Escrow encourages you to review the privacy statements of Web sites you choose to link to from All Net Escrow so that you can understand how those Web sites collect, use and share your information. All Net Escrow is not responsible for the privacy statements or other content on Web sites outside of the All Net Escrow and All Net Escrow family of Web sites.

Use of your Personal Information

All Net Escrow collects and uses your personal information to operate the All Net Escrow Web site and deliver the services you have requested. All Net Escrow also uses your personally identifiable information to inform you of other products or services available from All Net Escrow and its affiliates. All Net Escrow may also contact you via surveys to conduct research about your opinion of current services or of potential new services that may be offered.

Account Login

Account #:

Password:

[Forgot Password](#) [Login »](#)

All Net Escrow does not sell, rent or lease its customer lists to third parties. All Net Escrow may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your unique personally identifiable information (e-mail, name, address, telephone number) is not transferred to the third party. In addition, All Net Escrow may share data with trusted partners to help us perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information except to provide these services to All Net Escrow, and they are required to maintain the confidentiality of your information.

All Net Escrow does not use or disclose sensitive personal information, such as race, religion, or political affiliations, without your explicit consent.

All Net Escrow keeps track of the Web sites and pages our customers visit within All Net Escrow, in order to determine what All Net Escrow services are the most popular. This data is used to deliver customized content and advertising within All Net Escrow to customers whose behavior indicates that they are interested in a particular subject area.

All Net Escrow Web sites will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on All Net Escrow or the site; (b) protect and defend the rights or property of All Net Escrow; and, (c) act under exigent circumstances to protect the personal safety of users of All Net Escrow, or the public.

Use of Cookies

The All Net Escrow Web site use "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a Web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize All Net Escrow pages, or register with All Net Escrow site or services, a cookie helps All Net Escrow to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same Castle Wealth Management Web site, the information you previously provided can be retrieved, so you can easily use the Castle Wealth Management features that you customized.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the All Net Escrow services or Web sites you visit.

Security of your Personal Information

All Net Escrow secures your personal information from unauthorized access, use or disclosure. All Net Escrow secures the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure.

Changes to this Statement

All Net Escrow will occasionally update this Statement of Privacy to reflect company and customer feedback. All Net Escrow encourages you to periodically review this Statement to be informed of how All Net Escrow is protecting your information.

Contact Information

All Net Escrow welcomes your comments regarding this Statement of Privacy. If you believe that All Net Escrow has not adhered to this Statement, please contact All Net Escrow. We will use commercially reasonable efforts to promptly determine and remedy the problem.

Contact Info

All Net Escrow
allnetescrow.com
escrow@allnetescrow.com
1205 Iron Eagle Dr, Eagle
Eagle, Idaho 83616
Toll Free: (877) 589 9869
Direct Line: (208) 209-3272
FAX Line: (208) 485-3774

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Our Mission

To provide efficient escrow services, competitive and functional, based on a philosophy of service, innovation, a strong code of ethics and technology, as well as the integration of the expertise and experience we have acquired over the years. The human factor, however, remains our most definitive and strongest quality as well as our commitment to maintain the highest standards of professionalism.

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[Services](#)

[Contact Us](#)

ALL NET ESCROW



Contact Us

If you have any questions or concerns, please feel free to contact us.

Account Login

Account #: _____
Password: _____

[Forgot Password](#) [Login »](#)

Drop Us A Line

Name (required) _____

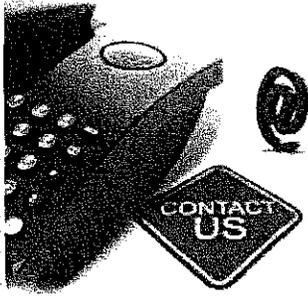
Email Address (required) _____

Phone _____

Your Message _____

submit

Testimonials



Our Mission

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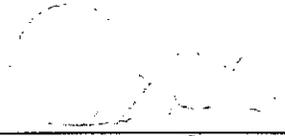
ALL NET ESCROW

CUSTOMER SATISFACTION GUARANTEE

We guarantee a clear and marketable title to every property we escrow. We go to great lengths to provide an accurate description of every property offered for sale. In addition, prior to the sale, we provide a detailed title search to ensure a smooth transaction. As a result, we guarantee that your property will be delivered in a free and clear status to the Buyer.

We further guarantee that you will receive full payment and reimbursement of all associated fees including any and all taxes, maintenance fees, transfer fees, etc. at the time of closing.

If, for any reason, you are not completely satisfied with your transaction, you will be entitled to a full refund of any fees paid.



General Manager
Jeffrey Ross

Owner Signature

Date

Owner Signature

Date

ALL NET ESCROW
1205 Iron Eagle Dr.
Boise, Idaho 83616
Toll Free: 877-589-9569 Phone: 208-473-7203 Fax: 208-473-2604
escrow@allnetescrow.com www.allnetescrow.com

ATTACHMENT C

ALL NET ESCROW

TRANSFER PROCESS

Payment is entirely contingent upon us receiving the following:

For a transfer of any property, we require:

- a) The purchase fund from the buyer.
- b) The Certificate of Ownership or Deed of Trust which allows transfers of the unit(s) and/or week(s).

For vacation club memberships or right-to-use timeshares we require:

- a) The purchase funds from the buyer.
- b) A Contract or Membership Agreement which allows transfer of the membership.

All Net Escrow is a vacation ownership closing company. Our job is to take care of the entire process of closing a timeshare sale and transferring resort property to the new owner; from seller to buyer.

All Net Escrow is a state-of-the-art timeshare closing service company. Working with your Timeshare Resort Company, we will handle each step in the timeshare closing process. For a one-time charge of a percentage upon the transaction, we provide the following:

Working with both the buyer and the seller

We will keep both parties informed of every development throughout the timeshare closing process, from start to finish. Through their best efforts, our team safeguards the relationship between the buyer and seller. We know what it's like to go through the process of buying and/or selling a timeshare, so we have the ability to make it a refined and painless procedure.

Recording fees and other aspects of timeshare recording

We take care of filing all of the necessary documents, and we will include the recording fees and recording fee taxes in our Closing Fee.

All Net Escrow
1205 Iron Eagle Dr.
Boise, Idaho 83616

Toll Free: 877-589-9669 Phone: 208-473-7203 Fax: 208-473-2604
escrow@allnetescrow.com www.allnetescrow.com

ALL NET ESCROW

TRANSFER OF OWNERSHIP AGREEMENT

For value received between

and All Net Escrow

It is mutually agreed that

Members hereby grant All Net Escrow authorization to act as their agent during the transfer process for the resort property listed below under Property Transferred. The exchange property shall be granted, conveyed, or assigned to All Net Escrow and/or its assignees in such manner as to pass legal title free and clear of any encumbrances that would constitute a lien upon the title.

Members further agree to provide All Net Escrow with proof of ownership and payment in full, along with appropriate document(s) showing legal description of said property (e.g. final recorded conveyance deed, lease, original certificate, and contract).

Property Transferred:

Grand Luxxe	3 Bedroom Villa		
Resort	Unit Type		
Nuevo Vallarta	Red Time	\$1	.00
Location	Season	Transfer Fee	
		\$	0
Exchange Company		Member(s) Price	

Transfer includes: the property described above and any weeks banked (but not reserved) with RCI or II

Transfer Fee: Member(s) to pay the above Transaction Expense which includes the preparation fees, recording fees, transfer fees and any taxes pertinent to the resort property. **Affirmation:** _____

Warranty: Member(s) warrant(s) that at this time and for the next sixty (60) days Property is and shall remain free and clear of all encumbrances, including but not limited to maintenance fees, taxes, and assessments. Member(s) further warrant(s) that he/she/they are/is the rightful owner(s) and has/have legal authority to affect transfer. To the best of Member(s) knowledge, the above information accurately describes the property to be exchanged. All agreements are in writing. **Affirmation:** _____

Default: Member(s) further agree(s) that in the event legal action arises in connection with this Agreement, the successful party shall recover from the other reasonable and actual legal costs and attorney fees as governed by the State of Idaho. All Net Escrow is an independent company and is not affiliated with any other corporation. In the event that the buyer rescinds their agreement, the service fee paid to All Net Escrow will not be refunded, however the account will be left open until a new buyer is established. **Affirmation:** _____

Entered this: 14th day of June, 2012

Tracking Number: A-(

X

Member Signature

X

Member Signature

ALL NET ESCROW
1205 Iron Eagle Dr.
Boise, Idaho 83616

Toll Free: 877-589-9869 Phone: 208-473-7203 Fax: 208-473-2604
escrow@allnetescrow.com www.allnetescrow.com

ALL NET ESCROW

TRANSFER OF OWNERSHIP AGREEMENT

<input type="text"/>	<input type="text"/>	<input type="text"/>
First Name	Last Name	M.I.
<input type="text"/>	<input type="text"/>	<input type="text"/>
First Name	Last Name	M.I.
<input type="text"/>	<input type="text"/>	<input type="text"/>
Legal Mailing Address		Apt Number
<input type="text"/>		<input type="text"/>
Address 2		
<input type="text"/>		
City	State	Country
<input type="text"/>	<input type="text"/>	<input type="text"/>
Postal Code	<input type="text"/>	
<input type="text"/>	<input type="text"/>	
Home Phone	Email	
<input type="text"/>	<input type="text"/>	
Work Phone	Fax	
<input type="text"/>	<input type="text"/>	

ALL NET ESCROW

June 14, 2012

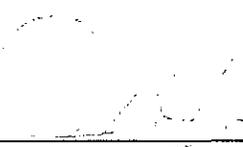
Dear

Congratulations on the sale of your property. Below you will find a breakdown of the costs associated with this transaction. Here is a summary for your records:

Resale Price for Grand Luxxe	\$1._____	<u>0USD</u>
10% transfer fee to be paid by the owner(s)	\$1._____	<u>0USD</u>
Total to be received by the owner(s)	\$1'_____	<u>USD</u>

This amount is guaranteed to be paid to the owner(s) (\$1_____ JSD). All Net Escrow has already received funds from the buyer and will continue to hold all funds until transaction is complete.

Sincerely,



General Manager
Jeffrey Ross

ALL NET ESCROW

WIRE TRANSFER INFORMATION

The following information is needed to process funds via a wire transfer and transaction must be made in US Dollars:

Beneficiary: Agencia de Transferencias Internacionales G12 S.A. de C.V.

Beneficiary Address: Sauz 301-C, Col. Valle de Leon

Leon, Guanajuato, Mexico C.P. 37140

Bank: Banco Mercantil del Norte, S.A.

Bank Address: Blvd. Hilario Medina #2503, Col. Real Prov., Leon, GTO, Mexico C.P. 37250

Account Number: 7342

Clabe Code: 072 26

SWIFT: MENOMXMT

ALL NET ESCROW

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IDAHO

DEPARTMENT OF FINANCE

C.L. "BUTCH" OTTER
Governor

GAVIN M. GEE
Director

Contact:

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Securities Bureau
(208) 332-8080 or
(208) 250-9335

CONSUMER ALERT

FOR IMMEDIATE RELEASE

June 22, 2012

Own a Timeshare in Mexico? Be Wary of Unlicensed Internet Companies All Net Escrow, Castle Wealth Management of Oklahoma City raise concerns

(Boise) – Gavin Gee, director of the Idaho Department of Finance, warned consumers and escrow and real estate industry members today to exercise caution when dealing with All Net Escrow, an on-line escrow company found at www.allnetescrow.com. All Net Escrow claims to be located at an Eagle, Idaho, address that belongs to an unrelated business. That business has no knowledge of All Net Escrow and became concerned after an individual came into its business inquiring about escrow services. All Net Escrow is not licensed by the department as an escrow company nor as any other financial service provider.

All Net Escrow appears to be working with Castle Wealth Management purportedly located in Oklahoma City, Oklahoma. The department has confirmed that no business by that name is located at the Oklahoma City address used by Castle Wealth. (Please note there is a legitimate investment advisory firm located in Florida called Castle Wealth Management that has no relationship to this investigation.)

Gee explained that, "While facts continue to be gathered, it appears that owners of timeshare units in Mexico are contacted by Castle Wealth claiming to have a buyer for their timeshare unit and asking if the owner is interested in selling. All Net Escrow sends account information to the owner, leading owners to believe funds have been received from a purchaser and are being held in escrow. The owner is then required to pay a "transfer fee" by wiring funds equal to between 1% and 5% of the sales price to a bank in Mexico. Owners are told this fee will be refunded at the closing of the transaction."

At least one owner was provided with a phony "license" created to look like an escrow company license issued by the department. The department has no record of ever having issued an escrow company license to All Net Escrow.

The department asks any person who has been contacted by either of these companies to contact the department at 208-332-8080 or Idaho toll free at 1-888-346-3378.

Department of Finance Press Releases and other information can be found on the Internet at <http://finance.idaho.gov> and may be obtained by contacting the department at (208) 332-8000 or Idaho toll-free at 1-888-346-3378.

ATTACHMENT D