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8 SUPERIOR COURT OF WASHINGTON FOR CLARK COUNTY

9 In re:

10 AMERICAN EAGLE MORTGAGE 100,
11 LLC; AMERICAN EAGLE MORTGAGE
12 200, LLC; AMERICAN EAGLE
13 MORTGAGE 300, LLC; AMERICAN
14 EAGLE MORTGAGE 400, LLC;
15 AMERICAN EAGLE MORTGAGE 500,
16 LLC; AMERICAN EAGLE MORTGAGE
17 600, LLC; AMERICAN EAGLE
18 MORTGAGE MEXICO 100, LLC;
19 AMERICAN EAGLE MORTGAGE
20 MEXICO 200, LLC; AMERICAN EAGLE
MORTGAGE MEXICO 300, LLC;
AMERICAN EAGLE MORTGAGE
MEXICO 400, LLC; AMERICAN EAGLE
MORTGAGE MEXICO 500, LLC;
AMERICAN EAGLE MORTGAGE
MEXICO 600, LLC; AMERICAN EAGLE
MORTGAGE I, LLC; AMERICAN EAGLE
MORTGAGE II, LLC; and AMERICAN
EAGLE MORTGAGE SHORT TERM, LLC.

Case No. 19-2-01458-06

RECEIVER’S NOTICE OF INTENT TO SELL
REAL PROPERTY (MAR DE PLATA II
SUBDIVISION, LOS CABOS, BAJA
CALIFORNIA SUR, MEXICO)

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Clyde A. Hamstreet & Associates, LLC, the duly appointed general receiver herein (the “Receiver”), gives this notice in accordance with paragraph 2 of the Order Establishing Procedures Regarding Receiver’s Sale of Real Property in the Ordinary Course of Business and Entry of Comfort Orders Approving Such Sales dated August 8, 2019 (the “Sale Order”).

1 The Receiver proposes to sell lots 11, 12, 13, 15, 16, 17, 18, 19, 21, 22, and 23 of the real
2 property and improvements commonly known as Phase II, of the Mar de Plata subdivision,
3 located in the parcel of land known as “Demásias de San Luis,” Santa Catarina Subdelegation, in
4 the San Jose del Cabo Delegation of the Municipality of Los Cabos, Baja California Sur, Mexico
5 (the “Property”), according to the basic terms set forth in the summary attached as Exhibit A
6 hereto.

7 The following information regarding the proposed sale is provided pursuant to the Sale
8 Order:

9 1. The Property consists of various lots, one mile off a paved road, in an off-grid
10 residential subdivision development. The Property is referred to in an area referred to as the
11 “East Cape.” It is situated on Lot 9-A of the property “Demásias de San Luis,” identified by
12 cadastral key 4-01-014-0019, within the Subdelegation of Santa Catarina, Municipality of Los
13 Cabos. The total surface area is approximately 240,313.33 square meters (24.03 hectares).

14 2. The seller and current title owner of the Property is Banca Mifel, S.A., Institucion
15 de Banca Multiple, Solely in its Capacity of Trustee of the “Administration and Development
16 Trust Number F/4663/2021” Referred to as “Mar de Plata” Represented by its Attorney in Fact
17 Benjamin Christopher Rosen. Mexican entity AEMEMMX X de RL de CV is a beneficiary of the
18 Seller and a subsidiary of American Eagle Mortgage 600, LLC. The receivership estate obtained
19 this interest in the Property through the Receiver’s settlement with Valerio Gonzalez Schcolnik
20 and his affiliate Inmobiliario Montanas del Cabo, SA de CV, notice of which was posted on
21 May 7, 2020, and which was approved by the Court by order dated June 3, 2020.

22 3. The buyers’ names corresponding to their respective lots are listed on Exhibit B
23 hereto.

24 4. To the best of the Receiver’s knowledge, the buyers are not related to any of the
25 entities that are the subject of this receivership, to American Equities, Inc., or to Ross Miles,
26 except that James E. (Jim) Hart, one of the buyers of lot 19, is the broker for these sales, and Ben

1 Rosen, the buyer of lot 22, is special Mexican counsel for the Receiver.

2 5. There are no known liens currently encumbering the Property.

3 6. The material terms and conditions of the proposed sale are: (a) the cash price, if
4 paid in cash, and original price, if financed, for each lot is listed on the attachment to Exhibit A;
5 (b) each of the buyers has paid an approximate 35% deposit based on the original price in the
6 amount set forth in the attachment to Exhibit A, which with certain exceptions are nonrefundable
7 to the buyers, and will pay the remaining balance pursuant to a promissory note; (c) closing is
8 estimated to occur in mid-February 2026; (d) the buyers will pay all closing costs, provided the
9 seller will pay its pro-rata share of owners' association assessments and real property taxes
10 through closing; (e) the Property will be conveyed free of liens; and (f) subject to the occurrence
11 of closing, the Receiver will be obligated to pay, and will pay in connection with the closing, a
12 broker's commission to the buyers' broker, James E. Hart, in an amount equal to 10% of the
13 gross purchase price.

14 7. No formal valuations of the Property have been done. The lots were listed for sale
15 based on input from the real estate broker, who helped pre-sell the Property. The Receiver
16 estimates that after paying the real estate commission to the broker and the Receiver's pro-rata
17 share of any preclosing assessments or taxes, the receivership estate will net approximately 70%
18 of the cash price, or about \$678,000.00 in the aggregate, from the sales.

19 YOU ARE NOTIFIED that unless a creditor or another party with standing notifies the
20 Receiver and the Receiver's attorneys, in writing within 14 calendar days after the date of this
21 notice, that such party objects to the proposed sale transaction, the Receiver intends to
22 consummate the sale transactions described above. Objections to the proposed sale transaction
23 must refer to this amended notice and be delivered or sent, so as to be actually received by the
24 Receiver within 14 calendar days after the date of this notice, as follows:

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AEM Receiver
c/o Miller Nash LLP
Attn: John R. Knapp, Jr.
605 5th Ave S, Ste 900
Seattle, Washington 98104
Email: john.knapp@millernash.com
Email: AEMReceiver@Hamstreet.net

DATED this 15th day of December, 2025.

MILLER NASH LLP

/s/ John R. Knapp, Jr.
John R. Knapp, Jr., P.C., WSB No. 29343

Attorneys for Receiver
Clyde A. Hamstreet & Associates, LLC

Exhibit A

AEM Receivership Notice of Proposed Sale Transaction

Mar de Plata Subdivision, Los Cabos, Baja California Sur, Mexico

Description of Property:

Approximately one mile off the paved road, this off-grid residential subdivision development is located in San José del Cabo, Baja California Sur, Mexico. This area is commonly known as the "East Cape." The Mar de Plata II project is situated on Lot 9-A of the property "Demasías de San Luis," identified by cadastral key 4-01-014-0019, within the Subdelegation of Santa Catarina, Municipality of Los Cabos. The total surface area is approximately 240,313.33 square meters (24.03 hectares).

Owner:

American Eagle Mortgage 600, LLC via Mexican entity AEMEMMX S DE RL DE CV

Buyer's relationship to AEM:

See attachment

Purchase Price:

See attachment

Cash Price:

See attachment

Deposits Received:

See attachment

Est. Closing Date:

12/25/2025

Broker:

James E. Hart



Material terms and conditions of sale:

Sale pursuant to executed purchase agreement between Banco Mifel, S.A., Institucion de Banca Multiple, as Trustee, and purchaser.

Receiver's comments:

Mar de Plata contains twenty-three lots and eleven have been pre-sold and are covered by this notice. The Mar de Plata lots were offered for pre-sale until July 2023. Under the pre-sale terms, buyers provided a 35% non-refundable deposit. The remaining 65% balance may be paid in cash at closing or financed over five years at either 7% or 9% interest, depending on the agreed option.

Objections to sale must be made within 14 days of posting. Objections should be emailed to John.Knapp@MillerNash.com and to AEMReceiver@Hamstreet.net.

Exhibit B

MAR DE PLATA II - Purchased Lots

Lot #	Buyer	Affiliation/Relationship (if any)	SQ MT	Cash Price	Original Price	Deposits Received	Balance Due / Prom. Note Balance	Status
L11	Cristina Montoya Sanchez	No	1,436.11	\$79,445.61	\$86,166.60	\$30,158.31	\$56,008.29	Paid
L12	Barry Sean O'Sullivan & Karen Lesley O'Sullivan	No	1,414.61	\$78,256.23	\$84,876.60	\$29,686.66	\$55,189.94	Paid
L13	Juan Manuel Humeniuk Villarreal	No	1,431.24	\$87,129.00	\$94,500.00	\$33,140.00	\$61,360.00	Paid
L15	La Fortunatias, LLC (Andrew Steven Jasco, Legal Representative)	No	1,683.92	\$93,154.45	\$101,035.20	\$35,362.32	\$65,672.88	Paid
L16	Nicolas Pedro Moretti	No	1,913.13	\$105,834.35	\$114,787.80	\$40,175.73	\$74,612.07	Paid
L17	Christopher John Gilsenen	No	1,401.93	\$78,370.00	\$85,000.00	\$29,750.00	\$55,250.00	Paid
L18	Daniel Couttolenc Diaz Barriga	No	1,400.87	\$77,496.13	\$84,052.20	\$29,418.27	\$54,633.93	Paid
L19	James Earle Hart & Mara Fabiola Ordoñez Villanueva.	Yes	1,293.85	\$77,540.43	\$84,100.25	\$29,435.09	\$54,665.16	Paid
L21	Sherry Melissa Jessen Quintanar	No	1,495.39	\$89,618.72	\$97,200.35	\$34,020.12	\$63,180.23	Paid
L22	Ben Rosen	Yes	1,622.56	\$97,240.02	\$105,466.40	\$36,913.24	\$68,553.16	Paid
L23	Hana Rose Beaman	No	1,740.85	\$104,329.14	\$113,155.25	\$39,604.34	\$73,550.91	Paid
			Total	\$968,414.08	\$1,050,340.65	\$367,664.08	\$682,676.57	