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**STATE OF CALIFORNIA**  
**BUSINESS, TRANSPORTATION AND HOUSING AGENCY**  
**DEPARTMENT OF CORPORATIONS**

TO: Aaron Arredondo a.k.a. Roman De Carlo  
Advanced Capital Solutions International, L.L.C.  
Imagine Omnimedia, L.L.C.  
2001 2nd Avenue, 24th Floor  
San Diego, CA 92101  
and  
1010 2nd Avenue, 24th Floor  
San Diego, CA 92101

**DESIST AND REFRAIN ORDER**  
**(For violations of sections 25110 and 25401 of the Corporations Code)**

The California Corporations Commissioner finds that:

1. At all relevant times, Aaron Arredondo (“Arredondo”), also known as Roman De Carlo, was the control person of Advanced Capital Solutions International, L.L.C., a California limited liability company formed on August 27, 2007. According to records filed with the California Secretary of State, Advanced Capital Solutions, L.L.C. maintained an office at 2001 2nd Avenue, 24th Floor, San Diego, CA 92101 and Arredondo was its registered agent and member. Advanced Capital Solutions International, L.L.C.’s letterhead indicates that the company maintained an office at 1010 2nd Avenue, 24th Floor, San Diego, CA 92101.

2. At all relevant times, Arredondo was also the control person of Imagine Omnimedia, L.L.C., a California limited liability company formed on August 27, 2007. According to records filed with the California Secretary of State, Imagine Omnimedia, L.L.C. maintained an office at 2001 2nd Avenue, 24th Floor, San Diego, CA 92101 and Arredondo was its registered agent and member.

1           3.       Beginning in or about August 2008, Arredondo, using the name Roman De Carlo,  
2 Advanced Capital Solutions, L.L.C. and Imagine Omnimedia, L.L.C. offered and sold securities, in  
3 the form of investment contracts entitled “Participation Agreements.”  
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5           4.       The purported purpose of the securities offering was to raise funds to bring a Jackie  
6 Chan/George Foreman Grill to the Chinese and Indian markets.  
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8           5.       Through general solicitations, in the form of telephone cold-calls, Arredondo,  
9 Advanced Capital Solutions, L.L.C. and Imagine Omnimedia, L.L.C. offered and sold securities to  
10 residents of California and elsewhere.  
11

12           6.       These securities were offered and sold in this state in issuer transactions. The  
13 Department of Corporations has not issued a permit or other form of qualification authorizing any  
14 person to offer or sell these securities in this state.  
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16           7.       In connection with these offers and sales, Arredondo, Advanced Capital Solutions,  
17 L.L.C. and Imagine Omnimedia, L.L.C. represented to investors that:

18           a.       Advanced Capital Solutions, L.L.C. was a “principal” involved with bringing  
19 the Jackie Chan/George Foreman Grill to the Chinese and Indian markets. In fact, Arredondo,  
20 Advanced Capital Solutions, L.L.C. and Imagine Omnimedia, L.L.C. were not “principals” and were  
21 not involved with bringing the Jackie Chan/George Foreman Grill project to the Chinese and Indian  
22 markets; and

23           b.       Investor funds would be secure because the funds would be deposited in a  
24 “Locked Account” with Morgan Stanley Smith Barney. In fact, not all investor funds were deposited  
25 in a “Locked Account” at Morgan Stanley Smith Barney and investor funds are now unaccounted for.  
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27           Based upon the foregoing findings, the California Corporations Commissioner is of the  
28 opinion that the investment contracts, entitled Participation Agreements, are securities subject to

1 qualification under the California Corporate Securities Law of 1968 (California Corporations Code  
2 section 25000 et seq.) and are being or have been offered and sold without being qualified in  
3 violation of Corporations Code section 25110. Pursuant to section 25532 of the Corporate Securities  
4 Law of 1968, Aaron Arredondo, also known as Roman De Carlo, Advanced Capital Solutions  
5 International, L.L.C. and Imagine Omnimedia, L.L.C. are hereby ordered to desist and refrain from  
6 the further offer or sale in the State of California of securities, including but not limited to investment  
7 contracts, unless and until qualification has been made under the law or unless exempt.

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9 Further, the California Corporations Commissioner is of the opinion that the securities were  
10 offered and sold in this state by means of written or oral communications which included an untrue  
11 statement of a material fact or omitted to state a material fact necessary in order to make the  
12 statements made, in the light of the circumstances under which they were made, not misleading, in  
13 violation of section 25401 of the Corporate Securities Law of 1968. Pursuant to section 25532 of the  
14 Corporate Securities Law of 1968, Aaron Arredondo, also known as Roman De Carlo, Advanced  
15 Capital Solutions International, L.L.C. and Imagine Omnimedia, L.L.C. are hereby ordered to desist  
16 and refrain from offering or selling or buying or offering to buy any security in the State of  
17 California, including but not limited to investment contracts, by means of any written or oral  
18 communication which includes an untrue statement of a material fact or omits to state a material fact  
19 necessary in order to make the statements made, in the light of the circumstances under which they  
20 were made, not misleading.

21  
22 This Order is necessary, in the public interest, for the protection of investors and consistent  
23 with the purposes, policies, and provisions of the Corporate Securities Law of 1968.

24 Dated: August 26, 2010  
25 Los Angeles, California

26 PRESTON DuFAUCHARD  
27 California Corporations Commissioner

28 By: \_\_\_\_\_  
ALAN S. WEINGER  
Deputy Commissioner