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

TO: Rudy Villareal, aka Rodolfo Villareal, Jr.
Raja Tredes Rei LLC
14328 La Harina Court
San Diego, CA 92129

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**DESIST AND REFRAIN ORDER
(For violations of sections 29520, 29535, and 29536 of the Corporations Code)**

The Commissioner of Business Oversight (“Commissioner”) finds that:

1. Raja Tredes Rei LLC (“Raja Tredes”) is a limited liability company formed under the laws of California on April 16, 2008. Its principal place of business is currently 14328 La Harina Court, San Diego, CA 92129. Its principal place of business was formerly 9420 Activity Road, Suite E, San Diego, CA 92126.

2. Rudy Villareal, also known as Rodolfo Villareal, Jr. (“Villareal”), is the founder and control person Raja Tredes. At all times, Villareal has had the same place of business as Raja Tredes.

3. On February 23, 2009, the California Corporations Commissioner (now the Commissioner of Business Oversight) issued a Desist and Refrain Order against Villareal and his companies, Socal First Funding Group, Socal First Funding Group FX Fund I, and Equity Concepts San Diego, for violating Corporations Code section 25110 by offering and selling securities without a permit or qualification.

4. Beginning in 2011 or earlier, Villareal and Raja Tredes offered and sold commodities and acted as a commodity merchant. Specifically, Villareal and Raja Tredes traded foreign currency on behalf of clients. The trading was performed pursuant to a General Fund Participation Agreement

1 that would be signed by the client and Villareal on behalf of Raja Tredes. On the General Fund
2 Participation Agreement, Villareal was listed as “Principle [sic] Trader.”

3 5. The foreign exchange traded by Villareal and Raja Tredes was a commodity within the
4 meaning of Corporations Code section 29504.

5 6. Neither Villareal nor Raja Tredes are registered or licensed with the Commodity
6 Futures Trading Commission as a commodity merchant or otherwise.

7 7. Villareal and Raja Tredes traded foreign exchange on behalf of clients without
8 disclosing to the clients that Villareal had been issued a Desist and Refrain Order by the California
9 Corporations Commissioner for violations of Corporations Code section 25110.

10 Based upon the foregoing, the Commissioner is of the opinion that Rudy Villareal, aka
11 Rodolfo Villareal, Jr., and Raja Tredes Rei LLC have offered and sold commodities and otherwise
12 acted as a commodity merchant in violation of Corporations Code sections 29520 and 29535.
13 Pursuant to Corporations Code section 29542 of the California Commodity Law of 1990, Rudy
14 Villareal, aka Rodolfo Villareal, Jr., and Raja Tredes Rei LLC are hereby ordered to desist and
15 refrain from the further offer and sale of commodities and from otherwise acting as a commodity
16 merchant, unless and until such activity is in compliance with the California Commodity Law of
17 1990.

18 Based upon the foregoing findings, the Commissioner is also of the opinion that, in
19 connection with the offer and sale of commodities or commodity contracts, Rudy Villareal, aka
20 Rodolfo Villareal, Jr., and Raja Tredes Rei LLC willfully made untrue statements of material fact or
21 omitted to state material facts necessary in order to make the statements made, in light of the
22 circumstances under which they were made, not misleading in violation of Corporations Code section
23 29536. Pursuant to Corporations Code section 29542 of the California Commodity Law of 1990,
24 Rudy Villareal, aka Rodolfo Villareal, Jr., and Raja Tredes Rei LLC are hereby ordered to desist and
25 refrain from the further offer and sale commodities by employing any untrue statement of material
26 fact or omitting to state material facts necessary in order to make the statements made, in light of the
27 circumstances under which they were made, not misleading.

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This order is necessary, in the public interest, for the protection of investors and consistent with the purposes, policies, and provisions of the California Commodity Law of 1990.

Dated: November 13, 2013
Sacramento, California

JAN LYNN OWEN
Commissioner of Business Oversight

By _____
MARY ANN SMITH
Deputy Commissioner
Enforcement Division