

DENISE VOIGT CRAWFORD
SECURITIES COMMISSIONER



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DEPUTY SECURITIES COMMISSIONER

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Texas State Securities Board

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MEMBER

BETH ANN BLACKWOOD
MEMBER

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MEMBER

IN THE MATTER OF
CORNERSTONE MINISTRIES
INVESTMENTS, INC., WELLBROOK
PROPERTIES, INC., CECIL A.
BROOKS, AND JOHN T. OTTINGER

§
§
§
§

Order No. ENF-05-CDO/FIN-1582

TO: Cornerstone Ministries Investments, Inc.
2450 Atlanta Highway, Suite 904
Cumming, Georgia 30040

Wellbrook Properties, Inc.
2450 Atlanta Highway, Suite 904
Cumming, Georgia 30040

Cecil A. Brooks
2450 Atlanta Highway, Suite 904
Cumming, Georgia 30040

John T. Ottinger
2450 Atlanta Highway, Suite 904
Cumming, Georgia 30040

AGREED CEASE AND DESIST ORDER

Be it remembered that Cornerstone Ministries Investments, Inc. ("Respondent Cornerstone"), Wellbrook Properties, Inc. ("Respondent Wellbrook"), Cecil A. Brooks ("Respondent Brooks"), and John T. Ottinger ("Respondent Ottinger") (collectively "Respondents") appeared before the Securities Commissioner of the State of Texas ("Securities Commissioner") and consented to the entry of this Order and the Findings of Fact and Conclusions of Law contained herein.

FINDINGS OF FACT

1. Respondents have waived (a) Respondents' right to notice and hearing in this matter; (b) Respondents' right to appear and present evidence in this matter; (c) Respondents' right to appeal this Order; and (d) all other procedural rights granted

to Respondents by The Securities Act, TEX. REV. CIV. STAT. ANN. art. 581-1 et seq. (Vernon 1964 & Supp. 2005) ("Texas Securities Act"), and the Administrative Procedure Act, TEX. GOV'T CODE ANN. §2001.001 et seq. (Vernon 2000 & Supp. 2005) ("Administrative Procedure Act").

2. Respondent Cornerstone maintains a last known address at 2450 Atlanta Highway, Suite 904, Cumming, Georgia 30040.
3. Respondent Wellbrook maintains a last known address at 2450 Atlanta Highway, Suite 904, Cumming, Georgia 30040.
4. Respondent Brooks maintains a last known address at 2450 Atlanta Highway, Suite 904, Cumming, Georgia 30040.
5. Respondent Ottinger maintains a last known address at 2450 Atlanta Highway, Suite 904, Cumming, Georgia 30040.
6. Respondents offered for sale to Texas residents shares of common stock and bonds in Respondent Cornerstone and shares of common stock in Respondent Wellbrook.
7. In connection with the offer for sale of the above-described stock and bonds, Respondents have represented in numerous Form SB-2's filed with the U.S. Securities and Exchange Commission ("SEC") that in relation to Respondent Cornerstone "The shares are approved for listing on the Chicago Stock Exchange, under the symbol "IHN".", which is materially misleading or otherwise likely to deceive the public in light of the fact that the Chicago Stock Exchange ("Exchange") has never approved any of Respondent Cornerstone's securities, whether stocks, bonds or otherwise, for listing on the Exchange.
8. In connection with the offer for sale of the above-described stock and bonds, Respondents have represented in Form S-11/A dated January 4, 2005, and filed with the State Securities Board on January 19, 2005, that "We are not aware of any major adverse business developments encountered by Cornerstone Ministries Investments.", which is materially misleading or otherwise likely to deceive the public in light of the fact that in a letter dated December 3, 2004, the Senior Vice President of the Exchange informed Respondents that, inter alia, Respondent Cornerstone had not satisfied the Exchange's minimum listings criteria, its pending application for listing is denied, and it should be assumed that any future applications for listing would be likewise denied.
9. In connection with the offer for sale of the above-described stock and bonds, Respondents have represented in a prospectus dated December 27, 2004, and filed with the State Securities Board on January 19, 2005, that "We are not a party to any pending legal proceeding. We are not aware...that any governmental authority is contemplating any legal proceeding involving us...", which is materially misleading or otherwise likely to deceive the public in light of the fact that the State of Michigan, Department of Labor & Economic Growth, Office of Financial and Insurance

Services, issued to Respondents in Enforcement Case Nos. 04-2978 and 04-2980 a Notice Of Opportunity To Show Compliance which alleges that, inter alia, Respondents have made an untrue statement of material fact, false and misleading statements, and filed an application for registration which contained a statement which was false or misleading with respect to a material fact.

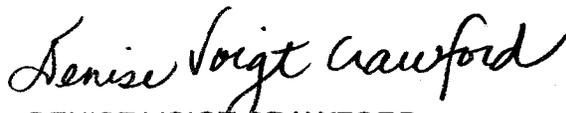
CONCLUSIONS OF LAW

1. The above-described stocks and bonds are "securities" as that term is defined by Section 4.A of the Texas Securities Act.
2. Respondents have engaged in conduct that is materially misleading and likely to deceive the public in connection with the offer for sale of securities.
3. The foregoing violations constitute bases for the issuance of an Agreed Cease and Desist Order pursuant to Section 23.A of the Texas Securities Act.

ORDER

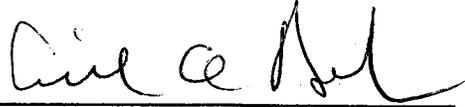
1. It is therefore ORDERED that Respondents immediately CEASE AND DESIST from engaging in conduct that is materially misleading or is otherwise likely to deceive the public in connection with the offer for sale of any security in Texas.
2. It is further ORDERED that Respondents are ASSESSED AN ADMINISTRATIVE FINE in the amount of Twenty Thousand Dollars (\$20,000). Payment shall be made by delivery of a cashier's check to the Securities Commissioner in the amount of Twenty Thousand Dollars (\$20,000), payable to the State of Texas, contemporaneously with the delivery of this Order.

SIGNED AND ENTERED by the Securities Commissioner this 14th day of February, 2005.


DENISE VOIGT CRAWFORD
Securities Commissioner

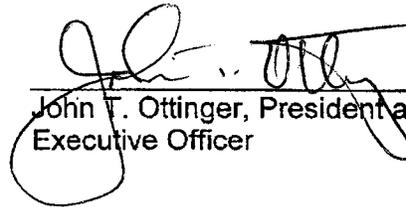
RESPONDENTS:

Cornerstone Ministries Investments, Inc.



Cecil A. Brooks, Director, Chairman of
the Board, President, CEO

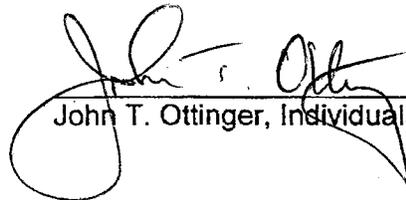
Wellbrook Properties, Inc.



John T. Ottinger, President and Chief
Executive Officer

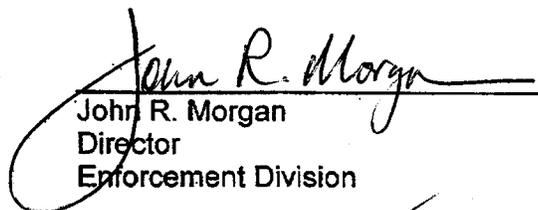


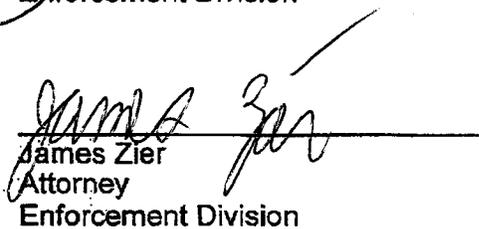
Cecil A. Brooks, Individually

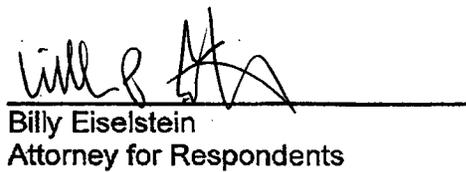


John T. Ottinger, Individually

Approved as to Form:


John R. Morgan
Director
Enforcement Division


James Zier
Attorney
Enforcement Division


Billy Eiselstein
Attorney for Respondents

ACKNOWLEDGMENT

On the 11th day of February, 2005, Cornerstone Ministries Investments, Inc. ("Respondent Cornerstone"), by and through Cecil A. Brooks, its Director, Chairman of the Board, President, and CEO, personally appeared before me, executed the foregoing Order and acknowledged that:

1. Cecil A. Brooks is duly authorized to enter into the foregoing Order on behalf of Respondent Cornerstone;
2. Cecil A. Brooks has read the foregoing Order;
3. Respondent Cornerstone has been fully advised of its rights under the Texas Securities Act and the Administrative Procedure Act;
4. Respondent Cornerstone knowingly and voluntarily consents to the entry of the foregoing Order and the Findings of Fact and Conclusions of Law contained therein; and,
5. Respondent Cornerstone, by consenting to the entry of the foregoing Order, has knowingly and voluntarily waived its rights as set forth therein.

Hildred Montgomery
Notary Public in and for
The State of Georgia

[affix notary seal here]

My commission expires on: 8/21/2006

ACKNOWLEDGMENT

On the 11th day of February, 2005, Wellbrook Properties, Inc. ("Respondent Wellbrook"), by and through John T. Ottinger, its President and Chief Executive Officer, personally appeared before me, executed the foregoing Order and acknowledged that:

1. John T. Ottinger is duly authorized to enter into the foregoing Order on behalf of Respondent Wellbrook;
2. John T. Ottinger has read the foregoing Order;
3. Respondent Wellbrook has been fully advised of its rights under the Texas Securities Act and the Administrative Procedure Act;
4. Respondent Wellbrook knowingly and voluntarily consents to the entry of the foregoing Order and the Findings of Fact and Conclusions of Law contained therein; and,
5. Respondent Wellbrook, by consenting to the entry of the foregoing Order, has knowingly and voluntarily waived its rights as set forth therein.

Nieldred J. Montgomery
Notary Public and for
The State of Georgia

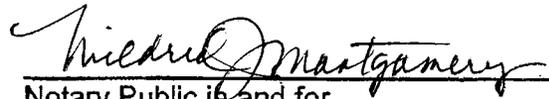
[affix notary seal here]

My commission expires on: 8/21/2006

ACKNOWLEDGMENT

On the 11th day of February, 2005, Cecil A. Brooks ("Respondent") personally appeared before me, executed the foregoing Order and acknowledged that:

1. Respondent read the foregoing Order;
2. Respondent has been fully advised of his rights under the Texas Securities Act and the Administrative Procedure Act;
3. Respondent knowingly and voluntarily consents to the entry of the foregoing Order and the Findings of Fact and Conclusions of Law contained therein; and,
4. Respondent, by consenting to the entry of the foregoing Order, has knowingly and voluntarily waived his rights as set forth therein.


Notary Public in and for
The State of Georgia

[affix notary seal here]

My commission expires on: 8/21/2006

ACKNOWLEDGMENT

On the 16th day of February, 2005, John T. Ottinger ("Respondent") personally appeared before me, executed the foregoing Order and acknowledged that:

1. Respondent read the foregoing Order;
2. Respondent has been fully advised of his rights under the Texas Securities Act and the Administrative Procedure Act;
3. Respondent knowingly and voluntarily consents to the entry of the foregoing Order and the Findings of Fact and Conclusions of Law contained therein; and,
4. Respondent, by consenting to the entry of the foregoing Order, has knowingly and voluntarily waived his rights as set forth therein.

Mildred Montgomery
Notary Public in and for
The State of Georgia

[affix notary seal here]

My commission expires on: 8/21/2006