



## **STATEMENT OF QUALIFICATIONS** **REAL ESTATE EXPERT WITNESS SERVICES**

**Michael K. Ryan, President**  
**CastleLyons Corporation**  
315 S. Coast Hwy 101, Suite U-3  
Encinitas, CA 92024  
Cell: 619.787.5988  
E-Mail: [m.k.ryan@castlelyons.net](mailto:m.k.ryan@castlelyons.net)  
**Website:** [www.castlelyons.net](http://www.castlelyons.net)

---

### **EDUCATION**

>>University Of Southern California, 1971  
Masters In Business Administration, Real Estate  
>>California State University Of Fullerton, 1970  
Bachelor Of Arts: Major; Marketing

### **LICENSES**

>>California State Broker's License  
License No. 1364253  
>>Hawaii State Broker's License  
License No. 21798  
>>California State Contractor's License (B-1)  
License No. 321645 and No. 728955

### **MILITARY SERVICE**

>>United States Navy  
Tonkin Gulf, Vietnam  
Honorable Discharge  
1965-1967

---

### **SUMMARY OF QUALIFICATIONS**

Forty-five years of experience in the real estate industry. Career-wise have (i) acquired and entitled over 40,000 lots, (ii) developed over 3,500 lots, (iii) built 1,000-plus homes, (iv) constructed over 25 projects as a General Contractor, (v) brokered \$350,000,000 of real estate, comprising 6,000 lots/units from 2003 to present and (vi) ran Divisions for privately and publicly-held land development and homebuilding companies.



As President of CastleLyons Corporation, for the past 25-plus years, have provided brokerage and consulting services to investors, property owners, developers, merchant homebuilders and litigators. In some cases, have acquired, entitled and built-out residential projects. Additionally, provide real estate expert witness services on a variety of areas of expertise to the legal profession.

Previous employment includes Vice President of Forward Planning and Development for a NYSE Company and Vice President of Development for the largest landowner in the City of Temecula, CA. Served for eight years as Vice President for DAON Corporation (at the time, the largest development company in North America) in charge of the San Diego Division managing three significant assets; La Costa, ShadowRidge and Miramar Ranch North. These assets totaled over 7,000 acres and nearly 20,000 potential residential units plus support commercial and industrial land. Lastly, worked for two privately-held Southern California homebuilders preceded by employment, upon graduation from USC, with a nationally recognized real estate consulting firm.

As a real estate expert witness, have performed expert services in Southern and Central California and in the States of Hawaii, Colorado, Utah, Oklahoma and Montana. Some of the areas of testimony have included; (i) partnership and joint venture dispute issues, (ii) profit participation challenges, (iii) asset dissolution and partition action, (iv) due diligence Industry customs and practices, (v) analysis of fraud claims, given Industry standards (vi) entitlement and development issues, (vii) a Takings claim against a municipality, (viii) standards of care and Industry customs and practices as it pertains to entitlement, development, homebuilding and brokerage (iv) non-compliance with Industry standards for fiduciary duties of a broker and sales agent, including dual agency representation, (x) loss of profits due to alleged contractor's delays, (xi) broker and sales agent misconduct, fiduciary responsibilities and compliance with National Association of Realtors Code of Ethics, (xii) access easement dispute, (xiii) loss of profit claim and analysis of damages due to alleged broker misconduct, (xiv) partnership and joint venture fiduciary duties, given Industry standards of care, (xv) developer/builder misconduct and lost profit analysis, (xvi) Industry standards, customs and practices re negotiations of "significant terms and conditions" of a PSA between principals, (xvii) PSA liquidated damages versus specific performance as a remedy for default, (xviii) rebuttal analysis for alleged lost profits and damage claims, (xix) dispute concerning Industry practices re: Off Balance Sheet transactions and related option and construction agreements, (xx) dissolution of corporate real estate assets, (xvii) conversion cause of action, (xxi) retained by the FDIC concerning various real property development and entitlement issues/constraints for delinquent loans, as well as, borrower's duty of independent inquiry as it pertains to due diligence responsibilities and (xxii) testimony relating to extreme departures from Industry standards, customs and practices.