

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

TO: Secure-Escrow.com
Secure-Escrow
Hardfort Escrow, Inc.
Autumn Ridge Rd.
Montgomery, AL 36116

Secure-Escrow.com
Secure-Escrow
Hardfort Escrow, Inc.
73-261 Highway 111, Suite 1
Palm Desert, CA 92260

Online Escrow Ltd.
Bainbridge St 377
Jacksonville, TX 75766

DESIST AND REFRAIN ORDER

The California Corporations Commissioner finds that:

1. Classified advertisements have been and currently are placed on Internet websites such as yahoo.com, infospace.com and classifieds2000.com offering for sale products including computers and computer peripherals. When members of the public contact the purported sellers by email and express interest in purchasing the advertised items, the purported sellers suggest that the buyers use the escrow services of a company located at the website secure-escrow.com in connection with the transaction. When the prospective purchasers wire the purchase funds in accordance with the instructions they receive pursuant to email communications with Secure-Escrow, they are unable to trace their money further, and they do not receive the products they are attempting to purchase.

2. The domain name registrant of the website secure-escrow.com is Online Escrow Ltd., purportedly located at Bainbridge St 377 in Jacksonville, Texas 75766. On March 11, 2002 the Internet website secure-escrow.com indicated that the address of Secure-Escrow and Hardfort Escrow, Inc. was Autumn Ridge Rd. in Montgomery, Alabama 36116. Subsequent to that date, the website has been changed, and now reflects the address of Secure-Escrow and Hardfort Escrow, Inc. to be 73-261 Highway 111, Suite 1, Palm Desert, CA 92260.

3. The website represents that Secure-Escrow provides escrow services through Hardfort Escrow, Inc., an operating subsidiary, and claims that Hardfort

Escrow, Inc. "is fully licensed and accredited as an escrow company" and that it possesses license #8237136 issued by the California Department of Corporations.

4. In fact, the Department of Corporations has no outstanding escrow license #8237136. Neither Secure-Escrow.com, Secure-Escrow, Online Escrow Ltd., nor Hardfort Escrow, Inc. is a company licensed as an escrow agent by the California Department of Corporations.

Based upon the foregoing findings, the California Corporations Commissioner is of the opinion that Secure-Escrow.com, Secure Escrow, its operating subsidiary Hardfort Escrow, Inc. and the domain name registrant Online Escrow Ltd. are advertising escrow services without being licensed escrow agents, in violation of Financial Code section 17403(a). The Commissioner is of the further opinion that Secure-Escrow.com, Secure Escrow, its operating subsidiary Hardfort Escrow, Inc. and the domain name registrant Online Escrow Ltd. are engaged, through subterfuge, in the business of receiving escrows for deposit or delivery without a license from the Commissioner, in violation of Financial Code section 17416. Accordingly, it is therefore ordered pursuant to Financial Code sections 17403(b) and 17416 that Secure-Escrow.com, Secure Escrow, its operating subsidiary Hardfort Escrow, Inc. and the domain name registrant Online Escrow Ltd. cease and desist from engaging in that business and place the domain name "secure-escrow.com" in "inactive status."

Dated: March 22, 2002
Sacramento, California

DEMETRIOS A. BOUTRIS
California Corporations Commissioner

By VIRGINIA JO DUNLAP
Acting Supervising Counsel
Enforcement and Legal Services Division