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

TO: Worldwide-escrow.com
Mary McCullar
1651 Guy Ferrell Road
Franklin, TN 37067

DESIST AND REFRAIN ORDER
(For violations of sections 17200 and 17403 of the California Financial Code)

The California Corporations Commissioner finds that:

1. Worldwide-escrow.com and Mary McCullar have engaged in the business of an escrow agent by advertising escrow services over the internet at www.worldwide-escrow.com from in or about 1999 to the present as follows:

a) Worldwide-escrow.com represents on its website that the process works as follows: Worldwide-escrow.com sends a transaction number to the buyer, and the buyer then sends payment, including the escrow fee, to Worldwide-escrow.com within 24 hours. Worldwide-escrow.com notifies the seller that the buyer's funds have cleared, and then the seller ships the goods to the buyer within 24 hours. Once the buyer receives and accepts the goods, Worldwide-escrow.com sends the funds to the seller.

b) Worldwide-escrow.com claims on its website that it protects both buyers and sellers from fraud with these procedures.

c) Worldwide-escrow.com and Mary McCullar have represented themselves to be licensed escrow agents by advertising that the company is Westside Escrow Corporation, located at 2452 Wilshire Boulevard, Suite 2, Santa Monica, California, 90403, license number 963-1857.

1 d) Although the Department of Corporations issued escrow license number 963-1857
2 to Westside Escrow Corporation, at the above-listed Santa Monica address, neither Mary McCullar
3 nor Worldwide-escrow.com are affiliated with Westside Escrow Corporation. Moreover, Westside
4 Escrow Corporation does not process escrows involving personal property over the Internet.

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6 2. Neither Worldwide-escrow.com nor Mary McCullar has been issued a license from the
7 Commissioner authorizing them to conduct business as an escrow agent, as required by California
8 Financial Code section 17200.

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10 3. Neither Worldwide-escrow.com nor Mary McCullar is exempt from the licensing
11 requirements of Section 17200.

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13 4. Neither Worldwide-escrow.com nor Mary McCullar has been issued a license from the
14 Commissioner authorizing them to use words indicating that they are in the escrow business, as
15 required by California Financial Code section 17403.

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17 Based upon the foregoing findings, the California Corporations Commissioner is of the opinion that
18 Worldwide-escrow.com and Mary McCullar and their officers, directors, partners, agents, employees
19 and/or servants are in violation of California Financial Code sections 17200 and 17403(a). Pursuant
20 to California Financial Code section 17416, Worldwide-escrow.com and Mary McCullar are hereby
21 ordered to desist and refrain from engaging in the business of receiving escrows for deposit or
22 delivery without first obtaining a license from the Commissioner. Pursuant to California Financial
23 Code section 17403(b), Worldwide-escrow.com and Mary McCullar are further ordered to
24 immediately desist and refrain from issuing, circulating, or publishing any advertisement by means of
25 any communication, including any website, or making use of or circulating any letterheads, billheads,
26 blank notes, blank receipts, blank escrow instructions, certificates, circulars, or any written or printed
27 paper containing any fictitious or corporate name or other words indicating that they are in the
28 escrow business. This Order is necessary, in the public interest, for the protection of investors and

1 consistent with the purposes, policies and provisions of the California Escrow Law. This order shall
2 remain in full force and effect until further order of the California Corporations Commissioner.

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Dated: May 24, 2004
Sacramento, California

WILLIAM P. WOOD
California Corporations Commissioner

By: _____
VIRGINIA JO DUNLAP
Deputy Commissioner
Enforcement and Legal Services