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

TO: Advescrow.com
Robert Cullen-Jones
18 Madison Court Grattan Street Off Lower Mount
Dublin 2, Ireland

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

The California Corporations Commissioner finds that:

1. Advescrow.com and Robert Cullen-Jones have engaged in the business of an escrow agent by advertising escrow services over the internet at www.advescrow.com from in or about 2004 to the present as follows:

a) Advescrow.com represents on its website that the process works as follows: The buyer and seller agree to the terms of the transaction. The buyer then sends the funds to Advescrow.com. The seller ships the goods to the buyer for inspection and approval. Once the buyer approves the goods, Advescrow.com releases the funds to the seller.

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

c) Advescrow.com and Robert Cullen-Jones have represented themselves to be licensed escrow agents by advertising that the company is Advanced Escrow Corporation, located at 33971 Selva Road, San Monarch Beach, California, 92629, license number 9631938.

1 d) In fact, the Department of Corporations issued escrow agent's license number 963-
2 1938 to Advanced Escrow Corporation, located at 33971 Selva Road, Monarch Beach, California,
3 92629, on April 15, 2002. Advescrow.com is not a website of Advanced Escrow Corporation, and
4 neither Advescrow.com nor Robert Cullen-Jones are affiliated with Advanced Escrow Corporation.

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6 2. Neither Advescrow.com nor Robert Cullen-Jones 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 Advescrow.com nor Robert Cullen-Jones is exempt from the licensing
11 requirements of Section 17200.

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13 4. Neither Advescrow.com nor Robert Cullen-Jones 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.

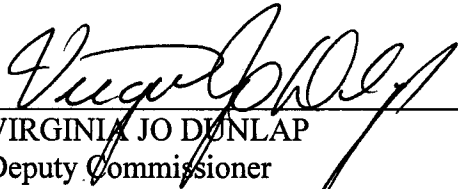
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17 Based upon the foregoing findings, the California Corporations Commissioner is of the opinion that
18 Advescrow.com and Robert Cullen-Jones and their officers directors, partners, agents, employees
19 and/or servants are in violation of California Financial Code sections 17200 and 17403(a). Pursuant
20 to California Financial Code section 17416, Advescrow.com and Robert Cullen-Jones 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), Advescrow.com and Robert Cullen-Jones are further ordered to immediately
24 desist and refrain from issuing, circulating, or publishing any advertisement by means of any
25 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.

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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 Escrow Law. This order shall remain in full force and effect until further order of the California Corporations Commissioner.

Dated: December 7, 2004
Sacramento, California

WILLIAM P. WOOD
California Corporations Commissioner

By: 
VIRGINIA JO DONLAP
Deputy Commissioner
Enforcement and Legal Services