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

TO: International-safe.com
Brian Morris
939 NW 79 Terrace
Saugerties, NY 12477

DESIST AND REFRAIN ORDER
(For violations of sections 17200, 17210.2 and 17403 of the California Financial Code)

The California Corporations Commissioner finds that:

1. International-safe.com and Brian Morris have engaged in the business of an escrow agent by advertising escrow services over the internet at www.international-safe.com from 2002 to the present as follows:

a) International-safe.com represents on its website that the process works as follows: The buyer and seller agree to the terms of a transaction. The buyer then sends payment to International-safe.com, and International-safe.com verifies that the funds are good. International-safe.com authorizes the seller to ship the goods and verifies that the buyer has received the merchandise. The buyer inspects the goods, and accepts or rejects them. International-safe.com then pays the seller the transaction price once the transaction is completed.

b) International-safe.com claims on its website that its process protects both buyers and sellers from fraud with this process.

c) International-safe.com and Brian Morris have represented themselves to be licensed escrow agents by claiming that International-safe.com's online escrow services are provided "by EAFC [Escrow Agents Fidelity Corporation] and BBB one of its operating subsidiaries," and that

1 “EAFC is fully licensed and accredited as an escrow company.”

2 d) In fact, EAFC provides fidelity coverage to escrow agents licensed by the
3 California Department of Corporations, but is not an escrow company and does not provide escrow
4 services for personal property transactions, or any other transactions, over the internet.

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6 2. International-safe.com and Brian Morris have disseminated or caused to be disseminated
7 false, misleading and/or deceptive representations which refer to the supervision of International-
8 safe.com by EAFC by falsely stating that International-safe.com’s online escrow services are
9 provided by EAFC.

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11 3. Neither International-safe.com nor Brian Morris has been issued a license from the
12 Commissioner authorizing them to conduct business as an escrow agent, as required by California
13 Financial Code section 17200.

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15 4. Neither International-safe.com nor Brian Morris are exempt from the licensing
16 requirements of Section 17200.

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18 5. Neither International-safe.com nor Brian Morris has been issued a license from the
19 Commissioner authorizing them to use words indicating that they are in the escrow business, as
20 required by California Financial Code section 17403.

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22 6. International-safe.com and Brian Morris are not members of or supervised by EAFC, nor
23 does EAFC provide online escrow services for either International-safe.com or Brian Morris.

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25 Based upon the foregoing findings, the California Corporations Commissioner is of the opinion that
26 International-safe.com and Brian Morris and their officers directors, partners, agents, employees
27 and/or servants are in violation of California Financial Code sections 17200, 17210.2(a) and
28 17403(a). Pursuant to California Financial Code section 17416, International-safe.com and Brian

1 Morris are hereby ordered to desist and refrain from engaging in the business of receiving escrows
2 for deposit or delivery without first obtaining a license from the Commissioner. Pursuant to
3 California Financial Code section 17403(b), International-safe.com and Brian Morris are further
4 ordered to immediately desist and refrain from issuing, circulating, or publishing any advertisement
5 by means of any communication, including any website, or making use of or circulating any
6 letterheads, billheads, blank notes, blank receipts, blank escrow instructions, certificates, circulars, or
7 any written or printed paper containing any fictitious or corporate name or other words indicating that
8 they are in the escrow business. Pursuant to California Financial Code section 17210.2(c),
9 International-safe.com and Brian Morris are further ordered to immediately desist and refrain from
10 disseminating, or causing or permitting to be disseminated, in any manner whatsoever, any statement
11 or representation which is false, misleading, or deceptive, or which omits to state material
12 information, or which refers to the supervision of that agent by the State of California or any
13 department or official thereof. International-safe.com and Brian Morris are further ordered to
14 immediately desist and refrain from disseminating or causing or permitting to be disseminated, in any
15 manner whatsoever, any statement or representation that International-safe.com is a member of, or is
16 otherwise in any manner associated with or supervised by, EAFC. This Order is necessary, in the
17 public interest, for the protection of investors and consistent with the purposes, policies and
18 provisions of the California Escrow Law. This order shall remain in full force and effect until further
19 order of the California Corporations Commissioner.

20
21 Dated: May 24, 2004
22 Sacramento, California

23 WILLIAM P. WOOD
24 California Corporations Commissioner

25 By: _____
26 VIRGINIA JO DUNLAP
27 Deputy Commissioner
28 Enforcement and Legal Services